

**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

RITELine Illinois, LLC)	Docket No. EL11-4069-000
RITELine Indiana, LLC)	Docket No. EL11-4070-000

**MOTION TO INTERVNE AND COMMENTS OF
CLEAN LINE ENERGY PARTNERS LLC**

This Motion to Intervene and Comments are filed pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. §§ 385.212 and .214 (2010), and the Notice issued on July 19, 2011.

I.

Correspondence or communications with respect to this pleading should be addressed to the following:

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II.

Clean Line Energy Partners LLC (“Clean Line”) is an independent developer of high voltage, long-haul transmission lines. Clean Line focuses exclusively on connecting the best renewable energy resources in North America with robust electricity demand centers through the use of high voltage, direct current (HVDC) transmission. Clean Line provides transmission solutions to generators and load-serving utilities to efficiently interconnect clean energy with

consumers and has projects under development that will be located in PJM Interconnection, L.L.C. (“PJM”).

As the United States moves to achieve its ambitious renewable energy goals, a dramatic expansion of the transmission grid is by far the most efficient way to incorporate renewable resources. Clean Line will play an instrumental role in accelerating the delivery of renewable energy from remote resource areas to distant load centers and in achieving United States energy and environmental policy goals. The need for lines like those that Clean Line is developing will continue to grow as electricity demand increases in the United States and as the demand for clean power sources accelerates. Technology improvements in wind and transmission make the efficient transportation of wind energy more feasible now than ever before.

Clean Line is backed by leading investors who share the vision that independent transmission developers can and should contribute to the development of our electric grid. Clean Line’s backers include the Houston-based Zilkha family and ZAM Ventures, L.P., the principal investment vehicle for ZBI Ventures, L.L.C (“ZBIV”). ZBIV, which focuses on long-term investments in the energy sector, is a subsidiary of Ziff Brothers Investments, L.L.C. The Zilkha family was the original owner of Horizon Wind, now the third largest wind generation company in the United States. Both of these investors, as well as the Clean Line management team, have a track record of successfully developing major energy projects. Clean Line has both the funding and the expertise to move forward with the financing and development of a major electric transmission project.

Clean Line is developing several high voltage, direct current transmission lines that will export wind and solar energy from some of America’s best resources to load centers and customers in regions without abundant indigenous renewable energy resources. In the upper Midwest, Clean

Line is actively developing the Rock Island Clean Line, a high-voltage, direct current transmission line that will connect 3,500 MW of wind power from Iowa, South Dakota, Minnesota and Nebraska with load centers in Illinois and states farther east and . Although wind energy in Iowa, Minnesota and the Dakotas has grown impressively in recent years, the construction of new projects in such premier wind resources locations will slow dramatically if additional transmission lines are not built soon. The Rock Island Clean Line will help to alleviate this transmission deficiency by bridging the gap between wind-abundant and wind-constrained areas.

Clean Line is developing the Grain Belt Express Clean Line, a new overhead high voltage direct current (“HVDC”) transmission line that will be capable of moving up to 3,500 MW of renewable power from new generation projects in western Kansas to the service area of the Midwest Independent Transmission System Operator (“MISO”) and the eastern United States. Currently, this line is proposed to connect with Ameren at its Francois substation in St. Francois County, Missouri.

Clean Line is also developing the Plains & Eastern Clean Line to deliver wind generated electricity to be produced in southwestern Kansas, northwestern Oklahoma and the Texas panhandle to the Tennessee Valley Authority and other areas of the southeastern United States. The Plains & Eastern Clean Line will consist of two ± 600 kilovolt direct current overhead transmission lines and is scheduled to deliver up to 7,000 MW of associated power to the TVA network and surrounding areas beginning in late 2016.

In the West, Clean Line is developing the Centennial West Clean Line, a high voltage direct current transmission line that will gather energy from renewable energy generation projects in eastern New Mexico and surrounding areas and will transmit it to load centers such as southern

Nevada, Southern California, Arizona, and other areas in the Southwest. The Project will deliver up to 3,500 megawatts (MW) of associated power to these load centers.

III.

On July 18, 2011, RITELine Illinois, LLC (“RITELine Illinois”) and RITELine Indiana, LLC (“RITELine Indiana”) (collectively, “RITELine Companies”) filed Applications for acceptance of a formula rate and approval of rate incentives for the “Reliability Interregional Transmission Extension” Project (“Project”), a major new transmission project within the footprint of PJM. It will consist of approximately 420 miles of 765 kV transmission lines and related facilities in Illinois and Indiana.

IV. Comments

While Clean Line does not take a position on the formula rate and rate incentives sought by the RITELine Companies, Clean Line supports the RITELine Companies’ proposal to build new transmission. Clean Line believes more electric transmission, such as the RITELine Companies’ proposal, is needed in PJM to cost-effectively integrate more renewable energy into the system, to improve reliability, to alleviate congestion and reduce costs.

V.

As a developer of transmission in PJM, Clean Line has a direct and material, economic, and legal interest in this proceeding that cannot be adequately represented by another party. Accordingly, Clean Line’s intervention is in the public interest.

VI. Conclusion

Transmission is required to ensure long-term energy security and is the most cost effective way to incorporate renewable resources into the grid. Projects such as those proposed by Clean

Line will complement the reliability projects like those proposed by the RiteLine Companies and help achieve a secure energy future. For this reason, Clean Line supports the RITELine Companies' proposal to build new transmission.

WHEREFORE, for the reasons set forth above, Clean Line respectfully requests that the Commission permit it to intervene in the proceeding and be made a party for all purposes.

Respectfully submitted,

/s/ Kathryn L. Patton

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