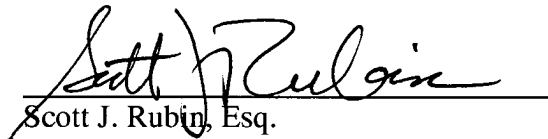




5. Permitting IBEW to reply to Applicants' Answer would be fully consistent with the policy embodied in the Commission's rules that a proposed intervenor should be given a reasonable opportunity to be heard. Permitting IBEW to reply also would enable the Administrative Law Judge to rule based on a full presentation of the issue, rather than the factual assertions and legal argument of only one party.

6. IBEW's proposed reply is attached hereto as Attachment A.

WHEREFORE, International Brotherhood of Electrical Workers, Local 89, respectfully requests permission to reply to Applicants' Answer in opposition to IBEW's intervention.



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Dated: July 2, 2009