

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

NATIONAL RURAL ELECTRIC
COOPERATIVE ASSOCIATION, et al.

Petitioners,

No. 15-1376

v.

UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY,

Respondent

**MOTION FOR PEDERNALES ELECTRIC COOPERATIVE, INC. FOR
LEAVE TO FILE AMICUS CURIAE BRIEF IN SUPPORT OF PETITIONERS**

Pursuant to Fed. R. App. P. 29(b) and D.C. Circuit Rule 29(b), Pedernales Electric Cooperative, Inc. (“PEC”) by and through its undersigned counsel, respectfully moves that it be permitted to file the amicus curiae brief in support of Petitioners National Rural Electric Cooperative Association, *et al.* in this case.

PEC is an electric cooperative located in the State of Texas. As an electric cooperative, PEC is directly affected by the rules, regulations and decisions created and enforced by the Environmental Protection Agency (“EPA”).

This motion is timely under Federal Rule of Appellate Procedure 29(e) and Circuit Rule 29(b)-(c) as it is being filed as soon as practicable as PEC’s board of directors convened and voted in favor of participating as amicus curiae on December 17, 2015.

If permitted to file an amicus curiae brief, PEC would file its brief in accordance with the briefing schedule and any formatting requirements established by the Court, including work count limitations.

Dated: January 4, 2016.

Respectfully submitted,

/s/ David Cosson

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Attorneys for Pedernales Electric Cooperative, Inc.

RULE 26.1 DISCLOSURE STATEMENT

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure and Circuit Rule 26.1, Pedernales Electric Cooperative, Inc. ("PEC") declares as follows: PEC is an electric cooperative located in the State of Texas. PEC does not have a parent corporation, and no publicly held corporation owns 10% or more of its stock.

By: /s/ David Cosson
David Cosson

CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2016, I filed the forgoing Motion for Pedernales Electric Cooperative, Inc. for Leave to File Amicus Curiae Brief in Support of Petitioners and Rule 26.1 Disclosure Statement through the Court's CM/ECF system, which will send a notice of filing to all registered CM/ECF users.

By: /s/ David Cosson
David Cosson

UNITED STATES COURT OF APPEALS
DISTRICT OF COLUMBIA CIRCUIT

333 Constitution Avenue, NW
Washington, DC 20001-2866
Phone: 202-216-7000 | Facsimile: 202-219-8530

Case Caption: National Rural Electric Coop. et al.

v.
Environmental Protection Agency

Case No: 15-1376

ENTRY OF APPEARANCE

Party Information

The Clerk shall enter my appearance as counsel for the following parties:
(List each party represented individually. Use an additional blank sheet as necessary)

- Appellant(s)/Petitioner(s) Appellee(s)/Respondent(s) Intervenor(s) Amicus Curiae

Pedernales Electric Cooperative, Inc.

Names of Parties

Names of Parties

Counsel Information

Lead Counsel: David Cosson (** See Page 2 for Additional Counsel)

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Notes: This form must be submitted by a member of the Bar of the U.S. Court of Appeals for the D.C. Circuit.

Names of non-member attorneys listed above will not be entered on the court's docket.

Applications for admission are available on the court's web site at <http://www.cadc.uscourts.gov/>

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Counsel Information

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