

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
)	
Complainant,)	
)	
vs.)	PCB No. 13-41
)	(Enforcement - Land)
AMEREN ENERGY RESOURCES,)	
GENERATING COMPANY, INC.,)	
)	
Respondent.)	

NOTICE OF ELECTRONIC FILING

PLEASE TAKE NOTICE that on May 1, 2014, I electronically filed with the Clerk of the Pollution Control Board of the State of Illinois, c/o John T. Therriault, Assistant Clerk, James R. Thompson Center, 100 W. Randolph St., Ste. 11-500, Chicago, IL 60601, a MOTION FOR EXTENTSION OF TIME TO RESPOND TO MOTION FOR SUBSTITUTION, copies of which are attached hereto and herewith served upon you.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

LISA MADIGAN,
Attorney General of the
State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/Asbestos
Litigation Division

BY: s/Raymond J. Callery
Raymond J. Callery
Assistant Attorney General
Environmental Bureau

500 South Second Street
Springfield, Illinois 62706
217/782-9031
Dated: May 1, 2014

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)	(Enforcement - Land)
AMEREN ENERGY RESOURCES,)	
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MOTION FOR EXTENSION OF TIME TO RESPOND
TO MOTION FOR SUBSTITUTION

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of Illinois, pursuant to Section 101.522 of the Board's Procedural Rules, 35 Ill. Adm. Code 101.522, hereby moves for an extension of time to respond to the Motion for Substitution filed by Respondent, Ameren Energy Resource Generating Company's ("AERG") and AmerenEnergy Medina Valley Cogen, L.L.C. ("Medina Valley"), and in support states as follows:

1. AERG and Medina Valley filed their Motion for Substitution on April 17, 2014 and a copy of the motion was received by the Attorney General's Office on April 21, 2014.
2. According to the supporting Affidavit of Craig W. Stensland, Medina Valley is the proper Respondent in this matter as a result of the Assignment and Assumption Agreement dated November 26, 2013 between AERG and Medina Valley.
3. AERG and Medina Valley did not attach a copy of the Assignment and Assumption Agreement to the Motion for Substitution and have provided no further information regarding this agreement.
4. Complainant has requested that counsel for AERG provide additional information and a copy of the Assignment and Assumption Agreement.

5. The Motion for Substitution should not be granted until such time as AERG and Medina Valley provide the requested additional information including a copy of the Assignment and Assumption Agreement and the Attorney General's Office has an opportunity for review.

WHEREFORE, for the reasons set forth above, the PEOPLE OF THE STATE OF ILLINOIS, request an extension of time of twenty-eight (28) days to respond to the Motion for Substitution.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,

LISA MADIGAN
Attorney General of the
State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/Asbestos
Litigation Division

BY: s/Raymond J. Callery
Raymond J. Callery
Environmental Bureau
Assistant Attorney General

500 South Second Street
Springfield, Illinois 62706
(217) 782-9031

Dated: May 1, 2014.

CERTIFICATE OF SERVICE

I hereby certify that I did on May 1, 2014, cause to be served by First Class Mail, with postage thereon fully prepaid, by depositing in a United States Post Office Box in Springfield, Illinois, a true and correct copy of the following instruments entitled NOTICE OF ELECTRONIC FILING and MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION FOR SUBSTITUTION upon the persons listed below.

To: Renee Cipriano
Francis X. Lyons
Deborah Bone
SCHIFF HARDIN LLP
233 s. Wacker Drive, Suite 6600
Chicago, IL 60606

s/ Raymond J. Callery
Raymond J. Callery
Assistant Attorney General