

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

AMEREN MISSOURI and RACCOON CREEK)	
ENERGY CENTER,)	
)	
Petitioner,)	
)	
v.)	PCB 15-088
)	(CAAPP Permit Appeal - Air)
ILLINOIS ENVIRONMENTAL PROTECTION)	
AGENCY,)	
)	
Respondent.)	

NOTICE OF FILING

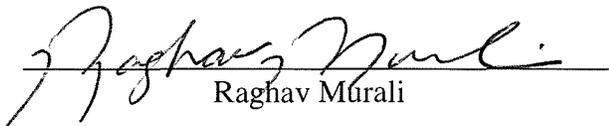
To:

Mr. John T. Therriault, Clerk
 Illinois Pollution Control Board
 James R. Thompson Center
 100 West Randolph, Suite 11-500
 Chicago, Illinois 60601
 john.therriault@illinois.gov

Ms. Carol Webb, Hearing Officer
 Illinois Pollution Control Board
 James R. Thompson Center
 100 West Randolph Street, Suite 11-500
 Chicago, Illinois 60601
 carol.webb@illinois.gov

Mr. Christopher J. Grant
 Assistant Attorney General
 Office of the Attorney General
 69 West Washington Street, Suite 1800
 Chicago, Illinois 60602
 cgrant@atg.state.il.us

PLEASE TAKE NOTICE that we have today filed with the Office of the Clerk of the Pollution Control Board **UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT**, a copy of which is herewith served upon you.


 Raghav Murali

Dated: April 28, 2015

SCHIFF HARDIN LLP

Attorneys for Ameren Missouri and Raccoon Creek Energy Center

Joshua R. More

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UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT

NOW COMES the Petitioner, Ameren Missouri and Raccoon Creek Energy Center (“Ameren” or “Petitioner”), by and through its attorneys, and pursuant to Section 101.500 of the Illinois Pollution Control Board (“Board”) regulations, 35 Ill. Adm. Code Sections 101.500, requests that the Board extend the date for filing Petitioner’s response to Respondent’s Motion for Summary Judgment until May 29, 2015. In support, the Petitioner states as follows:

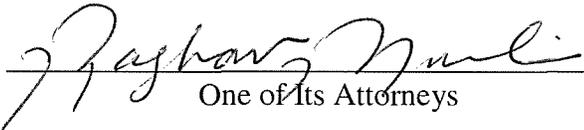
1. On April 24, 2015, the Respondent filed its Motion for Summary Judgment in this matter, and in two similar permit appeals (PCB 15-089 and PCB 15-134). The three Motions were electronically served on the undersigned on April 24, 2015.
2. In accordance with the Board Procedural Rules, unless an extension is granted, responses to all three Motions will be within 14 days of service, or by May 8, 2015.
3. The record in the three permit appeals is several thousand pages, and meeting the current response deadline will pose an unreasonable hardship.
4. The undersigned has contacted counsel for the Respondent, who does not object to an extension of the Response-filing deadline until May 29, 2015.

WHEREFORE, Petitioner, Ameren Missouri and Raccoon Creek Energy Center, respectfully requests that the Board grant its request and extend the deadline for filing a Response to Petitioner's Motion for Summary Judgment until May 29, 2015.

Respectfully submitted,

AMEREN MISSOURI and RACCOON CREEK
ENERGY CENTER

by:


One of Its Attorneys

Dated: April 28, 2015

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CERTIFICATE OF SERVICE

I, the undersigned, certify that on this 28th day of April, 2015, I have served electronically the attached **UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT** upon the following persons:

Mr. John T. Therriault, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601
john.therriault@illinois.gov

Mr. Christopher Grant
Assistant Attorney General
Office of the Attorney General
69 West Washington Street, Suite 1800
Chicago, Illinois 60602
cgrant@atg.state.il.us

and their having waived paper service, electronically upon the following person:

Ms. Carol Webb, Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
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