

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

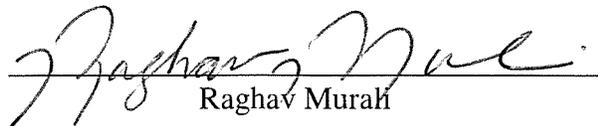
To:

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 LEAVE TO FILE A REPLY**, a copy of which is herewith served upon you.


 Raghav Murah

Dated: April 30, 2015

SCHIFF HARDIN LLP

Attorneys for Ameren Missouri and Raccoon Creek Energy Center

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UNOPPOSED MOTION FOR LEAVE TO FILE A REPLY

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 leave to file a reply to Respondent’s Response to Petitioner’s Motion for Summary Judgment. In support, the Petitioner states as follows:

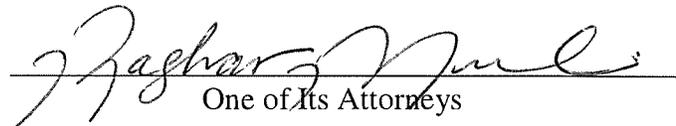
1. On March 17, 2015, Petitioner filed its Motion for Summary Judgment in this matter, and in two similar permit appeals (PCB 15-089 and PCB 15-134).
2. On April 24, 2015, Respondent filed its Response to Petitioner’s Motion for Summary Judgment.
3. Respondent has alleged facts and legal conclusions in its response that merit a response from Petitioner.
4. The undersigned has contacted counsel for the Respondent, who does not object to Petitioner filing a reply.
5. Consequently, pursuant to Illinois Admin. Code 101.500(e), Petitioner seeks to file a proposed Reply in Further Support of Petitioner’s Motion for Summary Judgment to aid this Board in evaluating the merits of Respondents’ motion.

6. Pursuant to Illinois Admin. Code 101.500(e), the Board and Hearing Officer have the discretion to allow reply briefs “to prevent material prejudice.”
7. Allowing Petitioner to file a reply will enable them to fully respond to issues of fact and law raised by Respondent in its responsive briefing.
8. For these reasons, Petitioner respectfully requests that this Board grant their Motion for Leave to File a Reply.

Respectfully submitted,

AMEREN MISSOURI and RACCOON CREEK
ENERGY CENTER

by:


One of Its Attorneys

Dated: April 30, 2015

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CERTIFICATE OF SERVICE

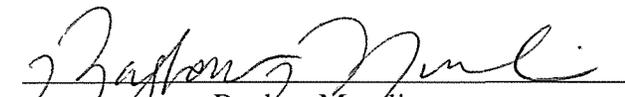
I, the undersigned, certify that on this 30th day of April, 2015, I have served electronically the attached **UNOPPOSED MOTION FOR LEAVE TO FILE A REPLY** upon the following persons:

Mr. John T. Therriault, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
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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
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