

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

SIERRA CLUB, NATURAL	)	
RESOURCES DEFENSE COUNCIL,	)	
PRAIRIE RIVERS NETWORK, and	)	
ENVIRONMENTAL LAW & POLICY	)	
CENTER	)	
Petitioners,	)	
v.	)	PCB 2015-189
ILLINOIS ENVIRONMENTAL	)	(Third Party NPDES Appeal)
PROTECTION AGENCY and	)	
MIDWEST GENERATION, LLC	)	
	)	
Respondents.	)	

**NOTICE OF ELECTRONIC FILING**

To:

Robert W. Petti Angad Nagra Illinois Environmental Protection Agency 69 W. Washington Street, Suite 1800 Chicago, IL 60602 rpetti@atg.state.il.us	Jessica Dexter Staff Attorney Environmental Law & Policy Center 35 E. Wacker Drive, Suite 1600 Chicago, IL 60601 (312) 795-3747 jdexter@elpc.org
Greg Wannier, Associate Attorney Sierra Club Environmental Law Program 85 Second Street, 2 <sup>nd</sup> Floor San Francisco, CA 94105 greg.wannier@sierraclub.org	Bradley P. Halloran Hearing Officer Illinois Pollution Control Board James R. Thompson Center, Suite 11-500 100 W. Randolph Street Chicago, IL 60601 Brad.Halloran@illinois.gov

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board Respondent, Midwest Generation, LLC's Answers to Petitioners' Interrogatories, a copy of which is herewith served upon you.

Dated: August 26, 2016

MIDWEST GENERATION, LLC

By: /s/ Susan M. Franzetti

Susan M. Franzetti  
Vincent R. Angermeier  
NIJMAN FRANZETTI LLP  
10 South LaSalle Street Suite 3600  
Chicago, IL 60603  
(312) 251-5590

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that I have served the attached Respondent, Midwest Generation, LLC's Answers to Petitioners' Interrogatories, by U.S. Postal Service by First Class Mail, postage prepaid, upon the following persons:

Robert W. Petti  
Angad Nagra  
Illinois Environmental Protection Agency  
69 W. Washington Street, Suite 1800  
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Bradley P. Halloran  
Hearing Officer  
Illinois Pollution Control Board  
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Chicago, IL 60601

Dated: August 26, 2016

/s/ Susan M. Franzetti

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SIERRA CLUB, NATURAL  
RESOURCES DEFENSE COUNCIL,  
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ENVIRONMENTAL LAW & POLICY  
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Petitioners,

v.

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY and  
MIDWEST GENERATION, LLC

Respondents.

PCB 2015-189  
(Third-Party NPDES Appeal)

**RESPONDENT, MIDWEST GENERATION, LLC'S,  
ANSWERS TO PETITIONERS' INTERROGATORIES**

Respondent, Midwest Generation, LLC ("MWGen"), pursuant to Illinois Pollution Control Board Rule 35 Ill. Admin. Code 101.616 hereby files its Answers to Petitioners' Amended Interrogatories dated August 9, 2016.

1. *Identify all persons that you might call as a witness at the IPCB hearing.*

**RESPONSE:**

MWGen presently does not plan to call any witnesses at the IPCB hearing.

2. *Identify all documents that you might use as exhibits at the IPCB hearing.*

**RESPONSE:**

MWGen has not yet identified the documents it will use as exhibits at the IPCB Hearing. MWGen might use documents from the administrative record as exhibits during the hearing, including but not limited to:

- MWGen's NPDES permit application (or excerpts therefrom) and comment letters to the Illinois EPA submitted during the NPDES permit renewal process;
- The PIC Study;
- The MWGen data on heat rejection and flow rates submitted to the Illinois EPA;

- The email from the Illinois Department of Natural Resources responding to the Agency's request for information about the causes of aquatic declines in Lake Michigan.

MWGen reserves the right to use other exhibits from the administrative record as appropriate.

Dated: August 26, 2016

Respectfully submitted,

MIDWEST GENERATION, LLC

/s/ Susan M. Franzetti  
Susan M. Franzetti

Susan M. Franzetti  
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