

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

<b>SIERRA CLUB,</b>	)	
	)	
<b>Complainant,</b>	)	
<b>v.</b>	)	
	)	
<b>ILLINOIS POWER GENERATING</b>	)	<b>PCB No-2019-078</b>
<b>COMPANY, ILLINOIS POWER</b>	)	<b>(Enforcement – Water)</b>
<b>RESOURCES GENERATING, LLC,</b>	)	
<b>ELECTRIC ENERGY, INC., and VISTRA</b>	)	
<b>ENERGY CORPORATION,</b>	)	
	)	
<b>Respondents.</b>	)	

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**NOTICE OF FILING:**

To:

Don Brown, Clerk of the Board  
Illinois Pollution Control Board  
100 W. Randolph St., Suite 11-500  
Chicago, IL 60601  
(312) 814-3620  
[don.brown@illinois.gov](mailto:don.brown@illinois.gov)

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PLEASE TAKE NOTICE that I have filed the following Appearance and Verified Statement pursuant to Illinois Supreme Court Rule 707 of Megan Wachspres before the Illinois Pollution Control Board in the above-captioned case today, copies of which are hereby served upon you.

Respectfully submitted,

/s/ Faith Bugel  
1004 Mohawk  
Wilmette, IL 60091  
(312) 282-9119  
[fbugel@gmail.com](mailto:fbugel@gmail.com)

*Attorney for Sierra Club*

Dated: February 11, 2020

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

SIERRA CLUB, )  
 )  
 Complainant, )  
 v. )  
 )  
 ILLINOIS POWER GENERATING )  
 COMPANY, ILLINOIS POWER )  
 RESOURCES GENERATING, LLC, )  
 ELECTRIC ENERGY, INC., and VISTRA )  
 ENERGY CORPORATION, )  
 )  
 Respondents. )

**PCB No-2019-078  
(Enforcement – Water)**

**APPEARANCE OF MEGAN WACHSPRESS  
AND CONSENT TO EMAIL SERVICE**

I hereby enter my appearance on behalf of Complainant Sierra Club. I authorize the service of documents on me by electronic mail in lieu of receiving paper documents in the above-captioned proceeding. My email address to receive service of documents is as follows:

[megan.wachspress@sierraclub.org](mailto:megan.wachspress@sierraclub.org).

/s/ Megan Wachspress  
Megan Wachspress

Dated: February 11, 2020

Megan Wachspress  
Associate Attorney  
Sierra Club Environmental Law Program  
2101 Webster St., Suite 1300  
Oakland, CA 94612  
(415) 977-5635  
[megan.wachspress@sierraclub.org](mailto:megan.wachspress@sierraclub.org)

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

<b>SIERRA CLUB,</b>	)	
	)	
<b>Complainant,</b>	)	
<b>v.</b>	)	
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<b>ILLINOIS POWER GENERATING</b>	)	<b>PCB No-2019-078</b>
<b>COMPANY, ILLINOIS POWER</b>	)	<b>(Enforcement – Water)</b>
<b>RESOURCES GENERATING, LLC,</b>	)	
<b>ELECTRIC ENERGY, INC., and VISTRA</b>	)	
<b>ENERGY CORPORATION,</b>	)	
	)	
<b>Respondents.</b>	)	

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**VERIFIED STATEMENT OF MEGAN WACHSPRESS**  
**PURSUANT TO ILLINOIS SUPREME COURT RULE 707**

I, Megan Wachspress, submit this Verified Statement pursuant to Illinois Supreme Court Rule 707.

1. My full name is Megan Claire Wachspress. The address of offices from which I practice law and related email address and telephone numbers are as follows:

2101 Webster St., Suite 1300  
Oakland, CA 94612  
(415) 977-5635  
megan.wachspress@sierraclub.org
2. I represent Sierra Club in: Case No. PCB 2019-078 before the Illinois Pollution Control Board.
- 3(a). I have not filed any other appearance pursuant to this rule during this calendar year.
- 3(b). I have not received a registration number from the ARDC. I will be appearing in association with **Faith Bugel**, who is licensed and registered to practice before the Illinois State Bar Association (ARDC No. 6255685), and has submitted an Entry of Appearance before the Illinois Pollution Control Board on 12/17/2018 in PCB 2019-078.
- 4(a). I list each jurisdiction of admission, including any state, territory, or commonwealth of the United States, the District of Columbia, or in a

foreign country, and my full admission name and license number.

The State Bar of California, Megan Claire Wachspress, #310558

- 4(b). I have attached a letter or certificate of good standing for the jurisdictions listed in paragraph 4(a) above, current as of February 08, 2019. Please let me know if you require a more recent certificate.
5. I have no office or other presence in Illinois for the practice of law.
6. I submit to the disciplinary authority of the Supreme Court of Illinois.
7. I have undertaken to become familiar with and to comply, as if admitted to practice in Illinois, with the rules of the Supreme Court of Illinois, including the Illinois Rules of Professional Conduct and the Supreme Court Rules on Admission and Discipline of Attorneys, and other Illinois law and practices that pertain to the proceeding.
8. I certify that I have served this Statement upon the Illinois Pollution Control Board Hearing Officer, Attorney Registration and Disciplinary Commission of the Supreme Court of Illinois, and counsel for Respondents, and that these parties are all entitled to service under this rule.

I verify the accuracy and completeness of each of the above statements.

Dated: February 11, 2020

/s/ Megan Wachspress

Associate Attorney

Sierra Club Environmental Law Program

2101 Webster St., Suite 1300

Oakland, CA 94612

(415) 977-5635

[megan.wachspress@sierraclub.org](mailto:megan.wachspress@sierraclub.org)

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on February 11, 2020, I served electronically the attached Notice of Filing, Appearance and Verified Statement of Megan Wachspress, upon the following persons before 5:00pm CDT:

Don Brown, Clerk of the Board  
Illinois Pollution Control Board  
100 W. Randolph St., Suite 11-500  
Chicago, IL 60601  
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2100 McKinney Avenue, Suite 1100  
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Respectfully submitted,

/s/ Faith Bugel  
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Wilmette, IL 60091  
(312) 282-9119  
[fbugel@gmail.com](mailto:fbugel@gmail.com)

*Attorney for Sierra Club*