

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
)
PETITION OF AMEREN ENERGY) PCB AS 2021-008
) (Adjusted Standard – Land)
MEDIAN VALLEY COGEN LLC (OLD)
)
MEREDOSIA) FOR AN ADJUSTED)
)
STANDARD FROM 35 ADMIN. CODE)
)
PART 845)

NOTICE OF FILING

To: See attached Service List

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Pollution Control Board Ameren Energy Median Valley Cogen LLC's Response to Illinois EPA's Motion for Extension of time and Agreed Motion to Extend Discovery Deadline, a copy of which is herewith served upon you.

Dated: January 8, 2025

AMEREN ENERGY MEDINA VALLEY
COGEN, LLC

By: /s/Kristen L. Gale

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that a true copy of the foregoing Notice of Filing and Ameren Energy Median Valley Cogen LLC's Response to Illinois EPA's Motion for Extension of Time and Agreed Motion to Extend Discovery Deadline was electronically filed on January 8, 2025 with the following:

Don Brown, Clerk of the Board
Illinois Pollution Control Board
60 E. Van Buren Street, Suite 630
Chicago, IL 60605
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and that copies were sent via e-mail on January 8, 2025 to the parties on the service list.

Dated: January 8, 2025

/s/Kristen L. Gale

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
)
PETITION OF AMEREN EMERGY MEDIAN) PCB AS 2021-008
VALLEY COGEN LLC (OLD MEREDOSIA)) (Adjusted Standard – Land)
FOR AN ADJUSTED STANDARD FROM 35)
ADMIN. CODE PART 845)

**AMEREN ENERGY MEDIAN VALLEY COGEN LLC’S RESPONSE TO ILLINOIS
EPA’S MOTION FOR EXTENSION OF TIME AND AGREED MOTION TO EXTEND
DISCOVERY DEADLINE**

Ameren Energy Medina Valley Cogen, LLC (“Ameren”), pursuant to 35 Ill. Adm. Code 101.500 and 101.522, responds to Illinois EPA’s Motion for Extension of Time and also requests that the Hearing Officer enter an order extending the discovery deadline to 30 days, to February 17, 2025. In support thereof, Ameren states as follows:

1. On October 18, 2024, Ameren filed an agreed motion to extend the discovery period for 90 days, January 18, 2024, which the Hearing Officer granted on October 21, 2024.
2. On Thursday, December 19, 2024, Ameren filed a motion to stay the proceeding for 180 days to conduct an evaluation of an alternative to a Part 845 closure. Concurrent with its motion to stay, Ameren also filed a motion to extend the discovery deadline in consideration of the motion to stay.
3. On December 31, 2024, Illinois EPA filed a motion for extension of time to January 17, 2024 to respond to both motions.
4. Ameren does not object to Illinois EPA’s motion for extension of time.
5. Because the discovery deadline is January 18, 2025, pursuant to Section 101.522 of the Board rules, Ameren requests that the Hearing Officer extend the discovery deadline by 30 days, to February 17, 2025.

6. Illinois EPA has agreed to the 30-day extension

WHEREFORE, Ameren Energy Medina Valley Cogen, LLC requests that the Hearing Officer grant its Motion to Extend Discovery by 30 days, to February 17, 2025.

Respectfully submitted,

AMEREN ENERGY MEDINA VALLEY
COGEN, LLC

Petitioner,

By: /s/ Kristen L. Gale
One of its Attorneys

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