

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	AS 2021-006
PETITION OF SOUTHERN ILLINOIS)	
POWER COOPERATIVE FOR AN)	(Adjusted Standard)
ADJUSTED STANDARD FROM 35 ILL.)	
ADM. CODE 845 OR IN THE)	
ALTERNATIVE A FINDING OF)	
INAPPLICABILITY)	

To: See attached service list.

NOTICE OF ELECTRONIC FILING

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board the Illinois Environmental Protection Agency's Motion for Extension of Time, a copy of which is herewith served upon you.

Respectfully submitted,

Dated: September 18, 2025

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Rebecca Strauss
Division of Legal Counsel
2520 W. Iles Ave.
P.O. Box 19276
Springfield, IL 62794-9276
(217) 782-5544

BY: /s/Rebecca Strauss
Rebecca Strauss

THIS FILING IS SUBMITTED ELECTRONICALLY

SERVICE LIST

ARENTFOX SCHIFF LLP*

Joshua R. Moore – Joshua.More@afslaw.com

Amy Antonioli – Amy.Antonioli@afslaw.com

Bina Joshi – Bina.Joshi@afslaw.com

Sarah L. Lode – Sara.Lode@afslaw.com

ILLINOIS POLLUTION CONTROL BOARD

Don Brown, Clerk – don.brown@illinois.gov

Carol Webb, Hearing Officer – carol.webb@illinois.gov

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	
PETITION OF SOUTHERN ILLINOIS)	AS 2021-006
POWER COOPERATIVE FOR AN)	Adjusted Standard - Land
ADJUSTED STANDARD FROM)	
35 ILL. ADM. CODE 845 OR IN THE)	
ALTERNATIVE A FINDING OF)	
INAPPLICABILITY)	

MOTION FOR EXTENSION OF TIME

The Illinois Environmental Protection Agency (“Illinois EPA” or “Agency”), by and through its attorney, hereby submits its Motion for Extension of Time and requests an extension of time, up to and including October 10, 2025, to file its post-hearing brief concerning the Petition of South Illinois Power Cooperative for an Adjusted Standard from 35 Ill. Adm. Code 845 or in the Alternative a Finding of Inapplicability, stating as follows:

1. Simultaneous post-hearing briefs in the present matter are due on or before September 19, 2025.
2. The Agency has been working diligently to evaluate and complete its post-hearing brief concerning Petitioner’s requests as contained in the Petition.
3. The Agency’s post-hearing brief has required collaboration among a number of Agency personnel, some of whom have had intervening obligations. Additionally, on September 3, 2025, USEPA issued a formal statement that it could not readily approve adjusted standards granted by the Pollution Control Board as being consistent with federal requirements, which has necessitated further review of the present matter by Agency personnel.
4. The Agency is asking for a final 21-day extension to file its post-hearing brief until October 10, 2025. In the interest of fairness to both parties, the Agency asks that the extension be applied to both parties such that the simultaneous post-hearing briefs are due October 10, 2025.

5. The Agency is additionally asking for a final 21-day extension to file its response brief until December 1, 2025 (as November 28, 2025, is over the Thanksgiving holiday), so that the parties have the same amount of time to review and prepare their response briefs. In the interest of fairness to both parties, the Agency asks that the extension be applied to both parties such that the simultaneous response briefs are due December 1, 2025.

6. The Agency has reached out to opposing counsel and the parties were unable to agree on a 30-day extension.

WHEREFORE, Illinois EPA requests the Illinois Pollution Control Board grant its Motion for Extension of Time and grant the Agency up to and including October 10, 2025, to file its post-hearing brief with the Board, and to grant the Agency up to and including December 1, 2025, to file its response brief, both extensions of which should be applied to both parties.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Respondent,

/s/ Rebecca Strauss
Rebecca Strauss
Division of Legal Counsel
Illinois Environmental Protection Agency
2520 W. Iles Ave.
P.O. Box 19276
Springfield, IL 62794-9276
(217) 782-5544

THIS FILING IS SUBMITTED ELECTRONICALLY

CERTIFICATE OF SERVICE

I, the undersigned, on affirmation certify the following:

That I have served the attached **MOTION FOR EXTENSION OF TIME** by e-mail upon the following:

Joshua R. Moore – Joshua.More@afslaw.com

Amy Antonioli – Amy.Antonioli@afslaw.com

Bina Joshi – Bina.Joshi@afslaw.com

Sarah L. Lode – Sara.Lode@afslaw.com

Don Brown, Clerk – don.brown@illinois.gov

Carol Webb, Hearing Officer – carol.webb@illinois.gov

That I have served the attached **MOTION FOR EXTENSION OF TIME** upon the persons listed on the Service List, by electronic mail on September 18, 2025.

That my e-mail address is Rebecca.Strauss@illinois.gov.

That the e-mail transmission took place before 4:30 p.m. on the date of September 18, 2025.

/s/Rebecca Strauss

Rebecca Strauss