

ILLINOIS POLLUTION CONTROL BOARD

RECEIVED  
CLERK'S OFFICE

APR 25 2006

STATE OF ILLINOIS  
Pollution Control Board

In The Matter of:	)	
	)	
Proposed New 35 Ill. Adm. Code 225	)	No. R06-25
Control of Emissions from	)	(Rulemaking – Air)
Large Combustion Sources	)	

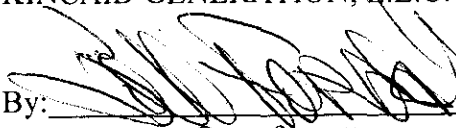
NOTICE OF FILING

TO: See attached Service List

PLEASE TAKE NOTICE that on April 25, 2006, I filed with the Office of the Clerk of the Pollution Control Board, MOTION FOR *PRO HAC VICE* ADMISSION OF KATHERINE M. RAHILL and APPEARANCE OF KATHERINE M. RAHILL, copies of which is herewith served upon you.

Respectfully submitted,

KINCAID GENERATION, L.L.C.

By:   
 \_\_\_\_\_  
 One of its attorneys

Bill S. Forcade  
JENNER & BLOCK LLP  
One IBM Plaza  
Chicago, IL 60611  
(312) 222-9350

ILLINOIS POLLUTION CONTROL BOARD

RECEIVED  
CLERK'S OFFICE

APR 25 2006

STATE OF ILLINOIS  
Pollution Control Board

In The Matter of:	)	
	)	
Proposed New 35 Ill. Adm. Code 225	)	No. R06-25
Control of Emissions from	)	(Rulemaking – Air)
Large Combustion Sources	)	

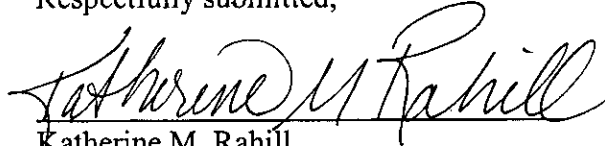
**MOTION FOR PRO HAC VICE ADMISSION OF KATHERINE M. RAHILL**

Pursuant to 35 Ill. Adm. Code § 101.400(a)(3), I, Katherine M. Rahill, hereby request that the Illinois Pollution Control Board permit my appearance *pro hac vice* in this matter on behalf of Kincaid Generation, L.L.C. In support of this motion, I state as follows:

1. I am a licensed attorney in the State of Colorado, where I was admitted to the practice of law in 2002. My attorney registration number in that State is 34109.
2. I am a member in good standing of the Bar of the State of Colorado and have been admitted to practice in the following federal bars:
  - a. U.S. District Court for the District of Colorado – June 26, 2003
3. No disciplinary proceedings are pending or have ever been brought against me, and I have never been disbarred or subject to disbarment proceedings.
4. I wrote and passed the February 2006 Illinois Bar Exam and will be sworn in on May 4, 2006.
5. Kincaid Generation, L.L.C. is represented by Jenner & Block, LLP, at which I am an associate.
6. I am familiar with the provisions of the Illinois Code of Civil Procedure, the Illinois Supreme Court Rules, and the Rules of the Illinois Pollution Control Board and I

understand and agree to be bound by them in all proceedings before the Illinois Pollution Control Board.

Respectfully submitted,



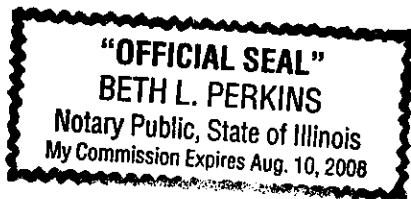
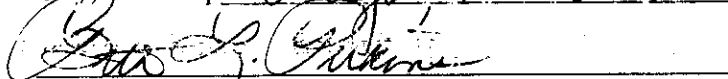
Katherine M. Rahill  
Jenner & Block LLP  
One IBM Plaza  
Chicago, IL 60611-7603  
312-840-8618

Dated: April 25, 2006

Subscribed and Sworn to before me this 25<sup>th</sup> day

April, 20 06.

City, State Zip Chicago IL 60611



ILLINOIS POLLUTION CONTROL BOARD

RECEIVED  
CLERK'S OFFICE

APR 25 2006

STATE OF ILLINOIS  
Pollution Control Board

In The Matter of: )

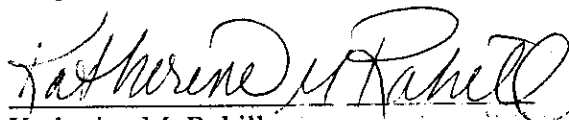
Proposed New 35 Ill. Adm. Code 225 )  
Control of Emissions from )  
Large Combustion Sources )

No. R06-25 )  
(Rulemaking – Air) )

APPEARANCE

I hereby file my appearance in this proceeding, on behalf of Kincaid Generation, L.L.C.

Respectfully submitted,



Katherine M. Rahill  
Jenner & Block LLP  
One IBM Plaza  
Chicago, IL 60611-7603  
312-840-8618

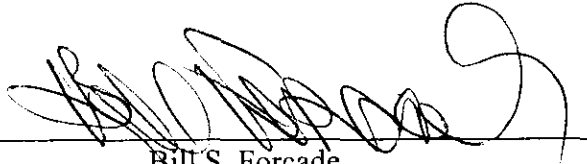
Dated: April 25, 2006

THIS FILING IS SUBMITTED ON RECYCLED PAPER

**CERTIFICATE OF SERVICE**

I, Bill S. Forcade, an attorney, hereby certify that I served a copy of the foregoing document, via first-class mail, postage fully prepaid, upon the parties on the attached Service List this 25th day of April, 2006:

By: \_\_\_\_\_

A handwritten signature in black ink, appearing to read "Bill S. Forcade", written over a horizontal line.

Bill S. Forcade

## SERVICE LIST

Gina Roccaforte, Assistant Counsel  
Charles Matoesian, Assistant Counsel  
John J. Kim, Managing Attorney  
Air Regulatory Unit  
Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

Dorothy Gunn, Clerk  
Illinois Pollution Control Board  
James R. Thompson Center  
100 W. Randolph St., Suite 11-500  
Chicago, IL 60601-3218

Bruce Nilles  
Sierra Club  
214 N. Henry Street, Suite 203  
Madison, WI 53703

Matthew Dunn, Chief  
Division of Environmental Enforcement  
Office of the Attorney General  
188 West Randolph St., 20th Floor  
Chicago, IL 60601

William A. Murray  
Special Assistant Corporation Counsel  
Office of Public Utilities  
800 East Monroe  
Springfield, Illinois 62757

Christopher W. Newcomb  
Karaganis, White & Mage., Ltd.  
414 North Orleans Street, Suite 810  
Chicago, Illinois 60610

David Rieser  
James T. Harrington  
McGuire Woods LLP  
77 West Wacker, Suite 4100  
Chicago, Illinois 60601

Faith E. Bugel  
Howard A. Learner  
Meleah Geertsma  
Environmental Law and Policy Center  
35 East Wacker Drive, Suite 1300  
Chicago, Illinois 60601

N. LaDonna Driver  
Katherine D. Hodge  
Hodge Dwyer Zeman  
3150 Roland Avenue, P.O. Box 5776  
Springfield, Illinois 62705-5776

Keith I. Harley  
Chicago Legal Clinic  
205 West Monroe Street, 4th Floor  
Chicago, Illinois 60606

S. David Farris  
Manager, Environmental, Health and Safety  
Office of Public Utilities, City of Springfield  
201 East Lake Shore Drive  
Springfield, Illinois 62757

Marie Tipsord  
Hearing Officer  
Illinois Pollution Control Board  
James R. Thompson Center  
100 W. Randolph  
Suite 11-500  
Chicago, Illinois 60601

Kathleen C. Bassi  
Sheldon A. Zabel  
Stephen J. Bonebrake  
Joshua R. More  
Glenna L. Gilbert  
SCHIFF HARDIN LLP  
6600 Sears Tower  
233 South Wacker Drive  
Chicago, Illinois 60606