Electronic Filing - Received, Clerk's Office: 03/18/2015

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

AMEREN MISSOURI and GOOSE CREEK ENERGY CENTER,))
Petitioner,)))
v.) PCB 15-089) (CAAPP Permit Appeal - Air)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,))
Respondent.))

NOTICE OF FILING

To:

Mr. John T. Therriault, Clerk Illinois Pollution Control Board James R. Thompson Center 100 West Randolph, Suite 11-500 Chicago, Illinois 60601 john.therriault@illinois.gov

Ms. Carol Webb, Hearing Officer Illinois Pollution Control Board James R. Thompson Center 100 West Randolph Street, Suite 11-500 Chicago, Illinois 60601 carol.webb@illinois.gov

Mr. Christopher J. Grant Assistant Attorney General Office of the Attorney General 69 West Washington Street, Suite 1800 Chicago, Illinois 60602 cgrant@atg.state.il.us

PLEASE TAKE NOTICE that we have today filed with the Office of the Clerk of the Pollution Control Board MOTION TO AMEND PETITIONER'S MEMORANDUM IN SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT, a copy of which is herewith served upon you.

Dated: March 18th, 2015

Electronic Filing - Received, Clerk's Office : 03/18/2015

Joshua R. More Raghav Murali Schiff Hardin LLP 233 South Wacker Drive Suite 6600 Chicago, IL 60606 312-258-5500 Fax: 312-258-5600

Fax: 312-258-5600 jmore@schiffhardin.com rmurali@schiffhardin.com

Electronic Filing - Received, Clerk's Office: 03/18/2015

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

AMEREN MISSOURI and GOOSE CREEK ENERGY CENTER,)
Petitioner,)
v.) PCB 15-089) (CAAPP Permit Appeal - Air)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,) (CAAFF Fermit Appear - Air)
Respondent.))

MOTION TO AMEND PETITIONER'S MEMORANDUM IN SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT

NOW COMES Petitioner, AMEREN MISSOURI and GOOSE CREEK ENERGY CENTER, by and through its attorneys, Schiff Hardin LLP, and requests to strike the phrase "and did not include the change in its Statement of Basis for the permit" in Section II ("UNDISPUTED MATERIAL FACTS") of PETITIONER'S MEMORANDUM IN SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT.

Respectfully submitted,

AMEREN MISSOURI and GOOSE CREEK ENERGY CENTER

by:

Dated: March 18, 2015

Electronic Filing - Received, Clerk's Office : 03/18/2015

Joshua R. More Raghav Murali Schiff Hardin LLP 233 South Wacker Drive Suite 6600 Chicago, IL 60606 312-258-5500 Fax: 312-258-5600

jmore@schiffhardin.com rmurali@schiffhardin.com Electronic Filing - Received, Clerk's Office: 03/18/2015

CERTIFICATE OF SERVICE

I, the undersigned, certify that on this 18th day of March, 2015, I have served electronically the attached **MOTION TO AMEND PETITIONER'S MEMORANDUM IN SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT** upon the following persons:

Mr. John T. Therriault, Clerk Illinois Pollution Control Board James R. Thompson Center 100 West Randolph, Suite 11-500 Chicago, Illinois 60601 john.therriault@illinois.gov Mr. Cristopher J. Grant Assistant Attorney General Office of the Attorney General 69 West Washington Street, Suite 1800 Chicago, Illinois 60602 cgrant@atg.state.il.us

and their having waived paper service, electronically upon the following person:

Ms. Carol Webb, Hearing Officer Illinois Pollution Control Board James R. Thompson Center 100 West Randolph Street, Suite 11-500 Chicago, Illinois 60601 carol.webb@illinois.gov

Raghav/Murali

Joshua R. More Raghav Murali Schiff Hardin LLP 233 South Wacker Drive Suite 6600 Chicago, IL 60606 312-258-5500 Fax: 312-258-5600

jmore@schiffhardin.com rmurali@schiffhardin.com