

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

AMEREN MISSOURI AND RACCOON)	
CREEK ENERGY CENTER,)	
)	
Petitioner,)	
)	
v.)	PCB No. 15-88
)	(Permit Appeal-CAAPP)
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY)	
)	
Respondent.)	

MOTION FOR EXTENSION OF
TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT

NOW COMES the Respondent, the Illinois Environmental Protection Agency (“Illinois EPA”), by and through its attorneys, and pursuant to Section 101.500 of the Illinois Pollution Control Board (“Board”) Regulations, 35 Ill. Adm. Code Sections 101.500, requests that the Board extend the date for filing Illinois EPA’s response to Petitioner’s Motion for Summary Judgment until April 22, 2015. In support, the Respondent states as follows:

1. On March 17, 2015, the Petitioner filed its Motion for Summary Judgment in this matter, and in two similar permit appeals (PCB 15-089 and PCB 15-134). The three Motions were served on the undersigned on March 24, 2015.
2. In accordance with the Board Procedural Rules, unless an extension is granted, responses to all three Motions will be within 14 days of service, or by April 8, 2015.
3. The record in the three permit appeals is several thousand pages, and meeting the current response deadline will pose an unreasonable hardship.
4. The undersigned has contacted counsel for the Petitioner, who does not object to an

extension of the Response-filing deadline until April 22, 2015. Counsel for Petitioner also advised that the Petitioner may wish to file a Reply to Respondent's Responses, to which Respondent will not object¹.

WHEREFORE, Respondent, the Illinois Environmental Protection Agency, respectfully requests that the Board grant its request and extend the deadline for filing a Response to Petitioner's Motion for Summary Judgment until April 22, 2015.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: 

Christopher Grant
Assistant Attorney General
Environmental Bureau
69 West Washington Street
Suite 1800
Chicago, Illinois 60602
(312) 814-5388

¹ The Parties recognize that acceptance of a Reply is solely within the Board's discretion.

CERTIFICATE OF SERVICE

I, CHRISTOPHER GRANT, an attorney, do certify that I caused Respondent's Motion for Extension of Time to Respond to Motion for Summary Judgment and Notice of Electronic Filing, to be served upon the persons listed below on March 30, 2015, by electronic mail and by placing same in an envelope bearing sufficient postage with the United States Postal Service located at 100 W. Randolph, Chicago, Illinois.



CHRISTOPHER GRANT

Mr. John Therriault
Assistant Clerk
Illinois Pollution Control Board
100 W. Randolph
Chicago, Illinois 60601
(by electronic filing)

Ms. Carol Webb
Hearing Officer
Illinois Pollution Control Board
(by electronic mail)

Mr. Joshua R. More
Mr. Raghavf Murali
Schiff Hardin, LLP
6600 Willis Tower
233 S. Wacker Drive
Chicago, IL 60606-6473
jmore@schiffhardin.com
rmurali@schiffhardin.com
(by electronic mail and first class mail)