

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	
JOHNS MANVILLE, a Delaware Corporation,)	
Complainant,)	PCB No. 14-3
)	
v.)	
)	
ILLINOIS DEPARTMENT OF TRANSPORTATION,)	
)	
Respondent.)	

NOTICE OF FILING

To: See Attached Service List

PLEASE TAKE NOTICE that on November 25, 2020, I caused to be filed with the Clerk of the Pollution Control Board of the State of Illinois, Johns Manville’s Motion to Correct October 29, 2020 Hearing Transcript, a copy of which is attached hereto and herewith served upon you via e-mail.

JOHNS MANVILLE

By: /s/ Kristen L. Gale

Dated: November 25, 2020

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that a true copy of the foregoing Johns Manville's Motion to Correct October 29, 2020 Hearing Transcript was filed on November 25, 2020 with the following:

Don Brown, Clerk
Illinois Pollution Control Board
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and that true copies were emailed on November 25, 2020 to the parties listed on the foregoing Service List.

/s/ Kristen L. Gale

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

JOHNS MANVILLE, a Delaware corporation)	
)	
Complainant,)	
)	
v.)	PCB No. 14-3
)	(Citizen Suit)
)	
ILLINOIS DEPARTMENT OF)	
TRANSPORTATION,)	
)	
Respondent.)	

**JOHNS MANVILLE’S MOTION TO CORRECT
OCTOBER 29, 2020 HEARING TRANSCRIPT**

Pursuant to 35 Ill. Adm. Code 101.604, Respondent Midwest Generation, LLC (“MWG”), by its undersigned counsel, submits to the Hearing Officer this motion to correct the transcript for the October 29, 2020 hearing date and states as follows:

Page No.	Line No.	Now Reads	Requested Correction
4	6	We’re in the middle 45 cross-examination	We’re in the middle of cross-examination
5	1	and south side 45 site	and south side of site
5	8	45 site 6 halfway between	of site 6 halfway between
5	14-15	And you applied these Site 6 test pit borings using scaling off 45 a pdf,	And you applied these Site 6 test pit borings using hand scaling off of a pdf
5	21	45 that page, that might help you	of that page, that might help you
6	1-2	So, did you use this C-0022JM004753, which was hearing 6699,	So, did you use this C- 0022J, M004753 , which was hearing 66-99
6	8	This says this was AE Con’s	This says this was AECOM’s
6	13-14	670-1 is the final removal of as per plan, correct?	67-1 is the Final Removal Action Work plan, correct?
6	16	And if you could turn to 675-36	And if you could turn to 67-536.
7	3	Can you tell me when you get to 57-536	Can you tell me when you get to 67-536
7	6	fine plan, and you	final plan, and you
7	18	Instead 45 using this document	Instead of using this document
7	20	distances off a paper pdf off from an earlier	distances off a paper pdf from an earlier
8	4	line on site 3, a claim corridor was	line on site 3, a clean corridor was

Page No.	Line No.	Now Reads	Requested Correction
8	8	This is part 45 your expert report	This is part of your expert report
8	18	D3-15 and D3C	B3-15 and B3-16
8	19	Were those built in line with the hearing?	Were those both identified in the hearing?
9	3	drawing and some of the borings	decision and some of the borings
9	5	45.	of.
9	7	calculated as your denomination,	calculated as your denominator
9	22	is accurate, then your numerator	is inaccurate , then your numerator
10	2	the division 45 a numerator	the division of a numerator
11	1	the bottom 45 that page, and I'm	the bottom of that page, and I'm
11	3	length along the south side 45 Site 6	length along the south side of Site 6
11	16	about the North Shore gas was line.	about the North Shore gas line.
12	1	south side 45 Site 645 that measurement,	south side of Site 6 of that measurement,
12	11	45 it, correct, the 72 feet?	of it, correct, the 72 feet?
12	16	that was measured off 45 this base map,	that was measured off of this base map
12	18	North Shore gas?	North Shore gas line?
13	7-8	North Shore gas and site 6 for North Shore gas.	North Shore gas line and site for North Shore gas line.
14	15	You measured it in, but it whether	You measured it in, but whether
16	5	45 a deposition transcript.	of a deposition transcript.
17	8	This northeast excavation is comprised 45	This northeast excavation is comprised of
17	12	is based opinion measurements you made off 45 this map	is based upon measurements you made off of this map
17	16	it's also measured off 45 this map	it's also measured off of this map
17	21	boring B350 in your IDOT area 45 liability	boring B3-50 in your IDOT area of liability
19	1	45, page 28, line 11	of , page 28, line 11
19	21	excavation 45 an entire grid	excavation of an entire grid
20	1	grid 45 B350 or B345 in your IDOT	grid of B3-50 or B3-45 in your IDOT
20	13	Was B346 a	Was B3-46 a
20	17	I'll represent that B346 was a	I'll represent that B3-46
21	9	45 this, but	of this, but
21	17	I have a copy 45 it here.	I have a copy of it here.
21	21	LSR and Dr. Dr. Ebihara	LSR, and Dr. Ebihara
21	23-24	And on 123, USEPA says, quote, "To determine the extent 45 ACM,	And on 120-3 , USEPA says, quote, "To determine the extent of ACM,
22	9	the boundary 45	the boundary of
22	18	But you didn't county report 346	But you didn't count this in your report, B3-46
22	21	346 is in the	B3-46 is in the
22	23	45 site soil excavation	of site soil excavation

Page No.	Line No.	Now Reads	Requested Correction
23	5	You see B346 up	You see B3-46 up
23	18	If it's plotted too far to the	If it's plotted too far to the
23	20	east, and less 45 it falls	east, and less of it falls
24	7	Then it's less 45 it is	Then it's less of it is
24	14-15	And like Mr. Dorgan, you agreed the report gas references drove that need to dewater	And like Mr. Dorgan, you agreed that there were four task buckets that drove the need to dewater
25	17	4521.7 percent?	of 21.7 percent?
25	20	four categories 45 dewatering	four categories of dewatering
26	1	so all four 45 these categories	so all four of these categories
26	3	I think if you look the 207-7, it	I think if you look at 207-7
26	10	I didn't treat any 45 those four	I didn't treat any of those four
26	20	destruction services came into utility work and comprised	construction services payment to utility work that comprised,
26	23	Footnote 1945	Footnote 19 of
27	8	were charged with linear	returned to linear
27	12	create a clean bore corridor	Create a clean corridor
27	14	838 linear feet off 45 your map;	838 linear feet off of your map;
27	24	which you measured off 45 your	which you measured off of your
28	6	your attributions divided as	your attributions you divided this
28	9	cost total 45160,587	cost total of 160,587
28	16	on the site green, six	on the site 3 , six
28	19-20	Site 3 work, along for dewatering in Site 6	Site 3 work alone for dewatering, and Site 6
29	13	an allocation 45 zero for the ramp 7 because you thought it was too far west on parcel 039	an allocation of zero for the ramp because you thought it was too far west on parcel 0393
30	18	ACM was found 45 --	ACM was found of --
30	23-24	for B350 or B345	for B3-50 or B3-45
31	6	just a portion 45 that;	just a portion of that;
31	13-14	entire length 45 the north side and south side 45 Site 6	entire length of the north side and south side of Site 6
32	2	and south side 45 Site 6?	and south side of Site 6?
32	4	And your metric denominator	And your measured denominator
32	10	And that's measured off 45 your	And that's measured off of your
32	14	volume 45 filling in any way, shape 45 form,	volume of filling in any way, shape, or form,
32	21	alone and Site 60	alone and Site 6
33	11	identify which gas buckets	identify which task buckets
33	21	IDOT sent it to you ahead 45 time.	IDOT sent it to you ahead of time.
34	7	are 54 --	are --
35	18	45204-32, and here	of 204-32, and here
36	5	work categories of gas	work categories of task
36	15	45207-8?	of 207-8?

Page No.	Line No.	Now Reads	Requested Correction
36	19	for example, the Waukegan water	for example, if the Waukegan water
37	2	that all 45 these tasks	that all of these tasks
37	3	Site 3 and 6 prep, compensate in Site 3	Site 3 and 6 prep, Site 3
37	6	various task methods that we just went through?	various task buckets that we just went through?
37	23	I'm just trying to cut through the chase	I'm just trying to cut to the chase
39	13	is doing her redirect 45	is doing her redirect of
40	7	subsurface characterizations 45 Site 3	subsurface characterizations of Site 3
40	15	photograph that begins at 5550 grid?	paragraph that begins at 50x50 grid?
40	18	"The 5550 grid	"The 55x50 grid
41	4	could read the top 45 this	could read the top of this
41	8	this map in preparation 45	this map in preparation of
41	15	go to 57-2087.	go to 57-287
41	19	location D315	location B3-15
42	16	I don't recall off the top 45 my head.	I don't recall off the top of my head.
43	6	transite a and the remaining as concrete salt paper,	transite pipe and the remaining as concrete felt paper,
43	13	bore samples drilled	core samples drilled
43	14	Board Order didn't site	Board Order cited
43	20	206, which is	6 , which is
43	23	If you could turn to 0625	If you could turn to 6-25 .
44	3	Can you go to the bottom 45 this	Can you go to the bottom of this
44	19	Exhibit 0625 --	Exhibit 6-25--
44	24	the first stage 45 this matter?	the first stage of this matter?
45	2	, which is 0625	, which is 6-25
45	9	Objection, lack 45 foundation	Objection, lack of foundation
46	6	construction 45 Detour Road A.	construction of Detour Road A.
46	24	It's letting out	It's setting out
47	11	cross-section in the GASK bulletin --	cross-section in the as-built --
47	23	your first round 45 hearing	your first round of hearing
48	8	to 7 plus general general	to 7 plus general
48	11	457?	of 7?
49	8	and future grade 45 Greenwood	and future grade of Greenwood
49	22	future grade 45 both	future grade of both
50	6	the beginning 45 excavation.	the beginning of excavation
50	16	190 square yards 45	190 square yards of
50	23	east 457 plus 60?	east of 7 plus 60?
51	1	to the east 457 plus 60.	to the east of 7 plus 60.
51	8	45 station --	of station --
51	12	slightly west 455S.	slightly west of 4S.
51	18	to USEPA regarding ECB cleanups.	to USEPA regarding PCB cleanups.
51	24	the report wit comments,	the report with comments,

Page No.	Line No.	Now Reads	Requested Correction
52	16	Exhibit 2452	Exhibit 24-52
52	19	creating a bass	creating a
53	6	there is a lot 45 information on this,	there is a lot of information on this,
53	17	the viewing 45 figures	the viewing of figures
54	5	second round 45 hearings	second round of hearings
54	16	the same layout 45 this	the same layout of this
54	18	I'm lock being at	I'm looking at
56	8	to this round 45 hearing,	to this round of hearing,
57	12	, did AE Con that	, did AECOM that did
57	20	concept 45 the next clay boring	concept of the next clean boring
58	5	, in terms 45 boring	, in terms of boring
58	9	in some 45 your	in some of your
58	19	this sort 45 staggered	this sort of staggered
58	20	, in this process 45 going	, in this process of going
59	15	February 6 th , 2019	February 6, 2010 .
60:24	61:1	you have to mediate until you find a playing forum?	you have to remediate until you find a clean boring ?
61	5	the next planned	the next clean
61	17	reliable, not	liable , not
61	18	Irrespective 45 whether	Irrespective of whether
61	24	you spent a lot 45	you spent a lot of
62	1-2	, a lot 45 witnesses, a lot 45 effort	, a lot of witnesses, a lot of effort
62	14	It shows the layout 45 the	It shows the layout of the
63	3-4	economic impact 45 these different site boundaries for purposes 45	economic impact of these different site boundaries for purposes of
63	17	And in terms 45 figuring out	And in terms of figuring out
63	24	What kind 45	What kind of
64	17	the Board found any other attorney liable,	the Board found any other party liable,
64	20	Board consider culpability 45 any	Board consider culpability of any
65	5	esbestos-containing	asbestos -containing
65	7	outside of the scope 45 this	outside of the scope of this
65	8	THE WITNESS:	MS. O'LAUGHLIN:
65	16	Did the Board the source	Did the Board consider the source
66	3	Okay, 16 Ms. Brice,	Okay, Ms. Brice,
66	11	Ms. Brice, you pay proceed.	Ms. Brice, you may proceed.
67	19	at least two sort 45 construction	at least two sorts of construction
69	6	here east 457.60,	here east of 7.60,
69	7	east 457.60 around	east of 7.60 around
69	8	on this video.	on this drawing .
69	12	these were Atwell's	these were as-builts
69	13	These figures are based 45	These figures are based of
69	22	goes beyond the parameters 45 this second round 45	goes beyond the parameters of this second round of

Page No.	Line No.	Now Reads	Requested Correction
70	1	the first round 45 hearing,	the first round of hearing,
70	3	to this second round 45 hearings.	to this second round of hearings.
70	8	When you are dealing with at	When you are dealing with an
70	16	And take a look here at 21A 26A-1,	And take a look here at 21A-26A ,
70	23-24	there appears to be no exchanges to the more-information	there appears to be no changes to the for-information
73	8	Looking at 0441A, 7S, and	Looking at 204-41A , 7S, and
73	13	Yes, they were based upon borings and relationship.	Yes, they were based upon boring logs .
73	17-18	Yes, they give you an idea of what to when you expected the encounter, yes.	Yes, they give you an idea of what you would expect to encounter, yes.
73	21-22	It varies, because a lot 45 times – a lot 45 work	It varies, because a lot of times – a lot of work
74	2	Atwell drawings	as-built drawings
74	16	that give salt borings	that give some borings
75	1	Would with those found in 21A-26.	Where would those be found in 21A-26?
75	3	plans because they were part 45 it.	plans because they were part of it.
75	16	Were brace used for other miscellaneous	Were asbestos used for other miscellaneous
76	3	engineering utilization 45 that	engineering utilization of that
76	20	45 maps with the EPA,	of maps with the EPA,
77	5	providing comments on the eca.	providing comments on the ECA .
78	20	part 45 JMs theory	part of JMs theory
78	21	theory in the first round 45 hearings	theory in the first round of hearings
79	16	the discussion 45 detour	the discussion of detour
80	1	the cross-section 45	the cross-section of
82	1	45 you?	of you?
82	6	expert rebuttal report 45	expert rebuttal report of
83	8	264, please	206-4 , please
83	12-13	for attributing being costs.”	for attributing costs.”
83	14	respect to both 45 his	respect to both of his
83	18	He just used different forms 45	He just used different forms of
83	19	measurement for different gas buckets	measurement for different task buckets
84	5	Not necessary.	Not necessarily .
84	6	You say on the bottom 45206-4	You say on the bottom of 206-4
85	4-5	An example would be the North Shore GASK line in the main corridor	An example would be the North Shore Gas line and the clean corridor
85	8	the North Shore GASK line	the North Shore Gas line
85	21	liability to the immediately around	liability to the area immediately around

Page No.	Line No.	Now Reads	Requested Correction
86	18-19	representative of a after larger area.”	representative of a larger area.”
87	1	representative sample 45 a geographical	representative sample of a geographical
87	5	Whereas, Mr. Gobelman arced out the area	Whereas, Mr. Gobelman marked out the area
87	8	And here on 2069,	And here on 206-9
87	15	were they were	where they were
88	5	I'll respect to you	I'll represent to you
88	8	If you would like it take a	If you would like to take a
88	15	that started with face map	that started with Base map
88	19	USEPA approved AE Con	USEPA approved AECOM
89	2	boards here 45208-9 and	boards here of 208-9 and
89	8	the northeast section 45208-9?	the northeast section of 208-9?
89	12	ledge that AE Con Consultan Group	Edge that AECOM Consultant Group
89	20	Ms. Dutton your cad person?	Ms. Dutton your CAD person?
90	5	AE Com's drawings.	AECOM's drawings.
90	11	You have state claim coordinates	You have state plane coordinates
90	15	You have a couple 45 --	You have a couple of --
90	16-17	excavation teste samples, 1S to 8S, per AE Con, document 7536	excavation test samples, 1S to 8S, per AECOM document 67-536.
91	2	-- from one 45 your	-- from one of your
91	9	was just brought up last month.	was just brought up this morning.
91	16	locations 45 the test	locations of the test
91	19	“ACM boring location 1999.”	“ ELM boring location 1999.”
91	23	performed by ACM.	positive for ACM.
92	4	the AE Com drawing	the AECOM drawing
92	7-8	between Northern AE Con's locations	between northern AECOM's locations
92	11	location 45 Mr. Gobelman's	location of Mr. Gobelman's
92	16	boundary 45 site	boundary of site
93	4	His increasing are placed	His borings are placed
93	8	to yours in AE Con's?	to yours in AECOM's?
94	22	the northern boundary 45 site 3.	the northern boundary of site 3.
95	7	It's like	It's site
95	10	And what does found irone pipe	And what does found iron pipe
95	13	to designate some sort 45 boundary.	to designate some sort of boundary.
95	22	he did scaling off 45	he did scaling off of
96	18	He shifted it from the disperse one,	He shifted it from the first one,
97	2	that location 45	that location of
98	14	sample locations 45 representative	sample locations are representative
98	20	entire 5550	entire 55x50
98	23	all 450393 was	All of 0393 was
99	4	was in control 45 all 45 parcel 0393.	was in control of all of parcel 0393.

Page No.	Line No.	Now Reads	Requested Correction
99	16	include 0393 as part 45 IDOT's	include 0393 as part of IDOT's
99	18	It limited it for certain gas buckets.	It limited it for certain task buckets.
99	20	failed to rebut your points concerning IDOT area 45	failure to rebut your points concerning IDOT area of
100	10	at the intersection 45 D4 road A	at the intersection of detour road A
101	7	right-45-way.	right- of -way.
102	11	look at 21A and 26,	look at 21A-26
102	15-16	a bit and 21A-26 and	a bit at 21A-26 and
103	6-7	the point 45 this document 21A, 26B	the point of this document 21A-26
103	13	that are reflected in gas 7S where	that are reflected in 7S where
104	2	between as-builtd plans	between as-built plans
106	5	figure that has a peat marked	figure that has peat marked
106	20	State 7S?	sample 7S?
109	2	-- you've at boring logs	-- you've looked at borings logs
109	4	Is there any mention 45 black	Is there any mention of black
109	24	debris found them?	debris found in them?
110	3	And I would say 100 percent	And I would not say 100 percent
110	6	most important aspect 45 Mr.	most important aspect of Mr.
111	2	And we've gone though before	And we've gone through before
111	5	If you could to 207-18 please	If you could turn to 207-18 please
111	8	Mr. Gobelman do you used this	Mr. Gobelman used this
111	16-17	at lease onto only part of the northeast excavation that's is had parcel 0393.	to only part of the northeast excavation that's a part of parcel 0393.
112	3-4	Yes, it references undergraduate electric lines runs along 1S	Yes, it references underground electric lines that run along 1S
112	9	, does a comment fiber	, does a ComEd fiber
113	2	Do you believe Mr. Gorgan has placed the NRP's observations in the correct place?	Do you believe Mr. Gobelman has placed the Northeast excavation in the correct place?
113	6	easted, how does	east , how does
113	16-17	you believe the Washington water line is in the big pond location	you believe the Waukegan water line is in the wrong location
114	6	long the Waukegan water line	the Waukegan water line
115	23	Site 6 in our ground when on poles for the rest 45	Site 6 in the ground went on poles for the rest of
116	17	length 45 the lines	length of the lines
116	21	enumerator here on	numerator here on
117	7	where the line came out 45 Site	where the line came out of Site
117	18	That clean borders were created	That clean corridors were created
118	6	he used to calculated the	he used to calculate the
118	18	-- the actual location 454S.	-- the actual location of 4S.
118	23	the North Shore line on	the North Shore gas line

Page No.	Line No.	Now Reads	Requested Correction
118	24	Can you just explain the nature 45 your	Can you just explain the nature of your
119	11	, there was no ACM east of 458S.	, there was no ACM east of 8S.
119	22	So, it was the presence 45 ACM	So, it was the presence of ACM
120	10	That did you say?	What did you say?
120	12	entire length 45 the	Entire length of the
120	23	says the North Shore GASK lines run	says the North Shore Gas line runs
121	18	just west 454S.	just west of 4S.
122	12	sides 45 Site 6 to calculate his total area 45 work.	sides of Site 6 to calculate his total area of work.
123	19-20	south side 45 Site 6, the 419 linear fight feet.	south side of Site 6, the 419 linear feet.
123	23	IDOT's area 45	IDOT's area of
124	3	western edge 45 Site 6	western edge of Site 6
124	13	and south side 45	and south side of
125	23	Your method looked at the gas buckets	Your method looked at the task buckets
126	16-17	what the driver was out of the Bush National Marine.	what the driver for the remedy was.
127	10	and south 45 Site 6.	and of Site 6.
127	17	relay on measuring	rely on measuring
128	2	down to the rest 45	down to the rest of
128	7	support services tas bucket	support services task bucket
128	11	same metrology we've	same methodology we've
128	14-15	IDOT's share 45 construction-related costs, all 45 his calculations	IDOT's share of construction-related costs, all of his calculations
129	2	Mr. Dorgan	Mr. Gobelman
129	12	, with respect to all 45 these	, with respect to all of these
129	17	A couple 45 last questions	A couple of last questions
130	16-17	you had relied on AEM to provide you a cad file in the production 45 your	you had relied on AECOM to provide you a CAD file in the production of your
130	23	on my depositions.	in my deposition.
131	16-17	We had produced it bridget format, and we showed we produced some 45 those	We had produced it in pdf format, and we showed we produced some of those
132	7	that's created in side the	that's created inside the
132	11	this second round 45 hearings?	this second round of hearings?
133	18	And all those dates tells occur	And all those dates occur
134	4	between the AE Con	between the AECOM
134	15	, and AE Con's	, and AECOM's
135	1	Is that an accurate description 45 this	Is that an accurate description of this
135	4	And when some 45 these match	And when some of these match
135	6	On this Figure B345	On this Figure B3-45

Page No.	Line No.	Now Reads	Requested Correction
135	11	included 345	included B3-45
135	13	through the exercise 45	through the exercise of
135	15	that he had used AE Con's facts	that he had used AECOM's facts
135	24	Do you include	Did you include
136	11	45 – it begins	of -- it begins
136	23	was referred AE Con.	was prepared by AECOM.
136	24	But you do not agree with that?	But you do not have a cite with that?
137	14	that would have prepared by me.	that would have been reviewed by me.
137	21	45 this entire case,	of this entire case,
138	8	embankment that the present on	embankment that is present
138	15	discussed in the AE Con	discussed in the AECOM
139	20	I kind 45 lost it.	I kind of lost it.
140	18	driven by all 45 Site 3	driven by all of Site 3
141	7	And the clear corridors	And the clean corridors
141	12-13	I'll hand you what was disseminated as 21A-30	I'll hand you what was described as 21B-30
142	2	Road 8.	Road A.
142	3	the bottom part 45	the bottom part of
146	2	If you could foundation please	If you could please
147	12	With respect attributions clean	With respect to attributions of clean
149	2	, but at the bottom part 45 Figure	, but at the bottom part of Figure
149	9	221A and 226,	21A-26A,
149	15	221A and 226 was form the	21A-26A was from the
149	18	MS. O'LAUGHLIN:	MS. BRICE:
149	20	BY MS. BRICE:	BY MS. O'LAUGHLIN:
149	21	221A and 226;	21A-26A;
150	3	221A and 226 that	21A-26A that
150	9	2845646 was	21A was
150	12	is A21-26	is 21A-26
150	22	, and they know what bore	, and they know what for
152	4	MS. BRICE:	MS. GALE:

Respectfully submitted,
Midwest Generation, LLC

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

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