

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

<b>AMEREN MISSOURI and RACCOON CREEK</b>	)	
<b>ENERGY CENTER,</b>	)	
	)	
<b>Petitioner,</b>	)	
	)	
<b>v.</b>	)	<b>PCB 15-088</b>
	)	<b>(CAAPP Permit Appeal - Air)</b>
<b>ILLINOIS ENVIRONMENTAL PROTECTION</b>	)	
<b>AGENCY,</b>	)	
	)	
<b>Respondent.</b>	)	

**NOTICE OF FILING**

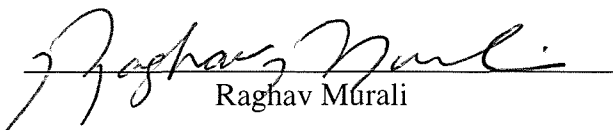
To:

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 **UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT**, a copy of which is herewith served upon you.

  
Raghav Murali

Dated: April 28, 2015

SCHIFF HARDIN LLP

Attorneys for Ameren Missouri and Raccoon Creek Energy Center

Joshua R. More

Raghav Murali

233 South Wacker Drive

Suite 6600

Chicago, IL 60606

312-258-5500

Fax: 312-258-5600

jmore@schiffhardin.com

rmurali@schiffhardin.com

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<b>ENERGY CENTER,</b>	)	
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<b>Petitioner,</b>	)	
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<b>v.</b>	)	<b>PCB 15-088</b>
	)	<b>(CAAPP Permit Appeal – Air)</b>
<b>ILLINOIS ENVIRONMENTAL PROTECTION</b>	)	
<b>AGENCY,</b>	)	
	)	
<b>Respondent.</b>	)	

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

NOW COMES the Petitioner, Ameren Missouri and Raccoon Creek Energy Center (“Ameren” or “Petitioner”), 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 Petitioner’s response to Respondent’s Motion for Summary Judgment until May 29, 2015. In support, the Petitioner states as follows:

1. On April 24, 2015, the Respondent 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 electronically served on the undersigned on April 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 May 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 Respondent, who does not object to an extension of the Response-filing deadline until May 29, 2015.

WHEREFORE, Petitioner, Ameren Missouri and Raccoon Creek Energy Center, respectfully requests that the Board grant its request and extend the deadline for filing a Response to Petitioner's Motion for Summary Judgment until May 29, 2015.

Respectfully submitted,

AMEREN MISSOURI and RACCOON CREEK  
ENERGY CENTER

by:

  
One of Its Attorneys

Dated: April 28, 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

**CERTIFICATE OF SERVICE**

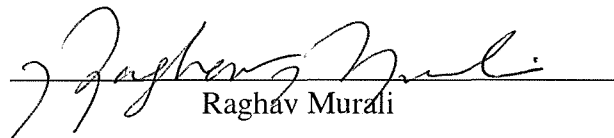
I, the undersigned, certify that on this 28<sup>th</sup> day of April, 2015, I have served electronically the attached **UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT** upon the following persons:

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. Christopher 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  
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