

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ENABLE MISSISSIPPI RIVER)	
TRANSMISSION, LLC f/k/a)	
CENTERPOINT ENERGY – MISSISSIPPI)	
RIVER TRANSMISSION, LLC,)	PCB 12-14
)	
Petitioner,)	(Permit Appeal – CAAPP)
)	
v.)	
)	
ILLINOIS ENVIRONMENTAL PROTECTION)	
AGENCY,)	
)	
Respondent.)	

NOTICE OF FILING


TO: See Attached Service List

PLEASE TAKE NOTICE that today I have filed with the Office of the Clerk of the Illinois Pollution Control Board the Respondent's **Motion for Leave to File Substitute Record**, on behalf of the Illinois Environmental Protection Agency, a copy of which is attached and hereby served upon you.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

LISA MADIGAN
Attorney General
State of Illinois

BY: 
 REBECCA A. BURLINGHAM
 Assistant Attorney General
 Environmental Bureau
 69 W. Washington St., 18th Floor
 Chicago, Illinois 60602
 (312) 814-3776
 rburlingham@atg.state.il.us

DATE: September 18, 2014

THIS FILING IS SUBMITTED ON RECYCLED PAPER

SERVICE LIST

John Therriault
Clerk
Illinois Pollution Control Board
100 West Randolph Street
Suite 11-500
Chicago, IL 60601
john.therriault@illinois.gov

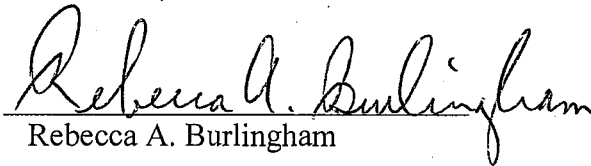
Garry L. Keele II
Hall Estill
320 South Boston Avenue, Suite 200
Tulsa, OK 74103
gkeele@hallestill.com

Carol Webb
Hearing Officer
Illinois Pollution Control Board
1021 North Grand Avenue East
P.O. Box 19274
Springfield, IL 62794-9274
carol.webb@illinois.gov

Robb Layman
Assistant Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
robb.layman@illinois.gov

CERTIFICATE OF SERVICE

I, Rebecca A. Burlingham, an Assistant Attorney General, certify that on the 18th day of September, 2014, I caused to be served by first class mail the foregoing Notice of Filing and Respondent's Motion for Leave to File Substitute Record upon on the parties on the attached service list, by depositing same in postage prepaid envelopes with the United States Postal Service located at 69 West Washington Street, Chicago, Illinois 60602, and by sending copies via electronic mail.


Rebecca A. Burlingham

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ENABLE MISSISSIPPI RIVER)	
TRANSMISSION, LLC f/k/a)	
CENTERPOINT ENERGY – MISSISSIPPI)	
RIVER TRANSMISSION, LLC,)	PCB 12-14
)	
Petitioner,)	(Permit Appeal – CAAPP)
)	
v.)	
)	
ILLINOIS ENVIRONMENTAL PROTECTION)	
AGENCY,)	
)	
Respondent.)	

MOTION FOR LEAVE TO FILE SUBSTITUTE RECORD

NOW COMES Respondent, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, by and through its attorney, LISA MADIGAN, Attorney General of the State of Illinois, and hereby moves to substitute the record before the Illinois Pollution Control Board (“Board”), the pages of which are not numbered, with an identical record containing page numbers. In support of its Motion, Respondent states as follows:

1. On October 31, 2011, Respondent filed five copies of the Agency Record (“Record”) with the Board. The pages in the five copies of the Record were not numbered.
2. Counsel for Respondent has conferred with counsel for Petitioner and advised him that Respondent wishes to substitute the Record on file with the Board with an identical agency record with numbered pages. The substitution would be made only in order to include page numbering rather than adding to or changing in any way the original record.
3. Counsel for Petitioner has advised counsel for Petitioner that he has no objection to substituting the Record with an identical agency record with numbered pages.

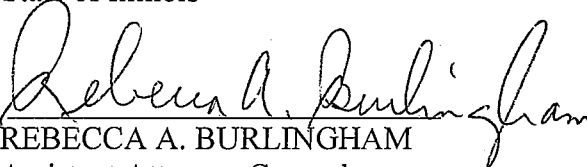
WHEREFORE, Respondent, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, respectfully requests that the Hearing Officer enter an order granting this Motion for Leave to Substitute Record, and granting Respondent 14 days from the date of entry of the order to file the substitute record.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

LISA MADIGAN
Attorney General
State of Illinois

BY:


REBECCA A. BURLINGHAM

Assistant Attorney General
Environmental Bureau
69 W. Washington St., 18th Floor
Chicago, Illinois 60602
(312) 814-3776
rburlingham@atg.state.il.us

DATE: September 18, 2014