

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

<b>AMEREN ENERGY RESOURCES,</b>	)	
<b>GENERATING COMPANY, INC.,</b>	)	
	)	
<b>Petitioner,</b>	)	
	)	
<b>vs.</b>	)	<b>PCB No. 14-41</b>
	)	<b>(Enforcement - Land)</b>
<b>ILLINOIS ENVIRONMENTAL</b>	)	
<b>PROTECTION AGENCY,</b>	)	
	)	
<b>Respondent.</b>	)	

**NOTICE OF ELECTRONIC FILING**

PLEASE TAKE NOTICE that on May 13, 2014, I electronically filed with the Clerk of the Pollution Control Board of the State of Illinois, c/o John T. Therriault, Assistant Clerk, James R. Thompson Center, 100 W. Randolph St., Ste. 11-500, Chicago, IL 60601, a MOTION FOR EXTENTSION OF TIME TO RESPOND TO MOTION FOR SUBSTITUTION, copies of which are attached hereto and herewith served upon you.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

LISA MADIGAN,  
Attorney General of the  
State of Illinois

MATTHEW J. DUNN, Chief  
Environmental Enforcement/Asbestos  
Litigation Division

BY: s/Raymond J. Callery  
Raymond J. Callery  
Assistant Attorney General  
Environmental Bureau

500 South Second Street  
Springfield, Illinois 62706  
217/782-9031  
Dated: May 13, 2014

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<b>GENERATING COMPANY, INC.,</b>	)	
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	)	<b>(Enforcement - Land)</b>
<b>ILLINOIS ENVIRONMENTAL</b>	)	
<b>PROTECTION AGENCY,</b>	)	
	)	
<b>Respondent.</b>	)	

**MOTION FOR EXTENSION OF TIME TO RESPOND  
TO MOTION FOR SUBSTITUTION**

Respondent, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, by LISA MADIGAN, Attorney General of Illinois, pursuant to Section 101.522 of the Board's Procedural Rules, 35 Ill. Adm. Code 101.522, hereby moves for an extension of time to respond to the Motion for Substitution filed by Petitioner, Ameren Energy Resource Generating Company's ("AERG") and AmerenEnergy Medina Valley Cogen, L.L.C. ("MedinaValley"), and in support states as follows:

1. AERG and Medina Valley filed their Motion for Substitution on April 17, 2014 and a copy of the motion was received by the Attorney General's Office on April 21, 2014.
2. According to the supporting Affidavit of Craig W. Stensland, Medina Valley is the proper Petitioner in this matter as a result of the Assignment and Assumption Agreement dated November 26, 2013 between AERG and Medina Valley.
3. AERG and Medina Valley did not attach a copy of the Assignment and Assumption Agreement to the Motion for Substitution and have provided no further

information regarding this agreement.

4. Respondent has requested that counsel for AERG provide additional information and a copy of the Assignment and Assumption Agreement.

5. The Motion for Substitution should not be granted until such time as AERG and Medina Valley provide the requested additional information including a copy of the Assignment and Assumption Agreement and the Attorney General's Office has an opportunity for review.

WHEREFORE, for the reasons set forth above, the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, requests an extension of time of twenty-eight (28) days to respond to the Motion for Substitution.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,

LISA MADIGAN  
Attorney General of the  
State of Illinois

MATTHEW J. DUNN, Chief  
Environmental Enforcement/Asbestos  
Litigation Division

BY: s/Raymond J. Callery  
Raymond J. Callery  
Environmental Bureau  
Assistant Attorney General

500 South Second Street  
Springfield, Illinois 62706  
(217) 782-9031  
Dated: May 13, 2014.

**CERTIFICATE OF SERVICE**

I hear by certify that I did on May 13, 2014, cause to be served by First Class Mail, with postage thereon fully prepaid, by depositing in a United States Post Office Box in Springfield, Illinois, a true and correct copy of the following instruments entitled NOTICE OF ELECTRONIC FILING and MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION FOR SUBSTITUTION upon the persons listed below.

To: Renee Cipriano  
Francis X. Lyons  
Deborah Bone  
SCHIFF HARDIN LLP  
233 S. Wacker Drive, Suite 6600  
Chicago, IL 60606

s/Raymond J. Callery  
Raymond J. Callery  
Environmental Bureau  
Assistant Attorney General