

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	AS 2021-003
Petition of Midwest Generation LLC for an)	
Adjusted Standard From 35 Ill. Adm. Code)	(Adjusted Standard)
845.740(a) and Finding of Inapplicability of)	
35 Ill. Adm. Code 845)	
(Waukegan Station))	

To: See attached service list.

NOTICE OF ELECTRONIC FILING

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board the Illinois Environmental Protection Agency’s Motion for Extension of Time, a copy of which is herewith served upon you.

Respectfully submitted,

Dated: July 25, 2022

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Stefanie N. Diers
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276
(217) 782-5544

Respondent,

BY: /s/Stefanie N. Diers
Stefanie N. Diers

THIS FILING IS SUBMITTED ELECTRONICALLY

SERVICE LIST

MIDWEST GENERATION, LLC

NIJMAN FRANZETTI LLP

Susan M. Franzetti

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ILLINOIS POLLUTION CONTROL BOARD

Brad Halloran, Hearing Officer

Don Brown, Clerk

James R. Thompson Center

100 W. Randolph, Suite 11-500

Chicago, IL 60601

Brad.Halloran@illinois.gov

Don.Brown@illinois.gov

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MOTION FOR EXTENSION OF TIME

The Illinois Environmental Protection Agency (“Illinois EPA” or “Agency”), by and through its attorney, hereby submits its Motion for Extension of Time and requests an extension of time, up to and including October 31, 2022, to file its recommendation concerning the Petition of Midwest Generation LLC for an Adjusted Standard from Section 845.740(a) and Finding of Inapplicability of 35 Ill. Admin. Code 845 (“Part 845”) at its Waukegan Station, stating as follows:

1. On May 11, 2021, Petitioner filed its Petition for Adjusted Standards from Part 845 (“Petition”).
2. The Agency’s recommendation is now due on or before August 1, 2022.
3. The Agency has been working diligently to evaluate and complete recommendations concerning Petitioner’s requests as contained in the Petition.
4. Lead Counsel, Christine Zeivel, is currently out on medical leave. The Agency has recently assigned this matter to a new attorney and therefore the Agency needs more time to file the Recommendation. The Agency is asking for an extension to file its Recommendation until October 31, 2022.
5. The Agency has reached out to opposing counsel and there is no objection to this extension.

WHEREFORE, Illinois EPA requests the Illinois Pollution Control Board grant its Motion for Extension of Time and grant the Agency up to and including October 31, 2022, to file its recommendation with the Board.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Respondent,

/s/ Stefanie N. Diers
Stefanie N. Diers
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276
(217) 782-5544

THIS FILING IS SUBMITTED ELECTRONICALLY

CERTIFICATE OF SERVICE

I, the undersigned, on affirmation certify the following:

That I have served the attached **MOTION FOR EXTENSION OF TIME** by e-mail upon the following:

Susan M. Franzetti	sf@nijmanfranzetti.com
Kristen Laughridge Gale	kg@nijmanfranzetti.com
Brad Halloran	Brad.Halloran@illinois.gov
Don Brown	Don.Brown@illinois.gov

That I have served the attached **MOTION FOR EXTENSION OF TIME** upon the persons listed on the Service List, by electronic mail on July 25, 2022.

That my e-mail address is Stefanie.diers@illinois.gov

That the e-mail transmission took place before 4:30 p.m. on the date of July 25, 2022.

/s/Stefanie N. Diers
July 25, 2022