

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
)
PETITION OF AMEREN ENERGY MEDINA) AS 21-008
VALLEY COGEN, LLC (OLD MEREDOSIA)) (Adjusted Standard - Land)
FOR ADJUSTED STANDARDS)
FROM 35 ILL. ADMIN. CODE PART 845)

AMEREN'S MOTION TO EXTEND DISCOVERY PERIOD

NOW COMES Petitioner, AMERENENERGY MEDINA VALLEY COGEN, LLC ("Ameren"), by and through its attorney, Scott B. Sievers of the law firm of Brown, Hay + Stephens, LLP, and, pursuant to 35 Ill. Adm. Code 101.522, hereby moves the honorable Hearing Officer to extend the discovery period in this matter by sixty (60) days. In support, Petitioner states the following:

1. On May 23, 2024, the parties agreed to a 90-day discovery period. (Hearing Officer Order of May 23, 2024).
2. On July 30, 2024, Ameren's Interrogatories to Illinois EPA and Ameren's Request for Production to Illinois EPA were served.
3. Good cause exists to extend the discovery period by sixty (60) days. Such an extension will provide time to review Illinois EPA's interrogatory answers and production responses once received and to attempt to resolve any issues that might exist with those discovery responses while also allowing sufficient time to secure witnesses by subpoena or otherwise and to schedule and to take their depositions. Consequently, Petitioner moves to extend the discovery period by an additional sixty (60) days, to October 20, 2024.
4. The undersigned has conferred with counsel for Respondent Illinois EPA, and Respondent has no objection to this sixty (60) day extension of the discovery period.

5. This motion is made in good faith and not for the purpose of undue delay.

WHEREFORE Petitioner AMERENENERGY MEDINA VALLEY COGEN, LLC
moves the honorable Hearing Officer to extend the discovery period in this matter by
sixty (60) days, to October 20, 2024.

Respectfully submitted,

Scott B. Sievers
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AMERENENERGY MEDINA
VALLEY COGEN, LLC,

Petitioner.

BY: s/Scott B. Sievers
Scott B. Sievers
Attorney for Petitioner

*In the Matter of Petition of
Ameren Energy Medina Valley Cogen, LLC (Old Meredosia)
for Adjusted Standards from 35 Ill. Adm. Code Part 845
Pollution Control Board No. AS 2021-008*

CERTIFICATE OF SERVICE

Scott B. Sievers of the law firm of Brown, Hay + Stephens, LLP herein certifies that on August 14, 2024, from Springfield, Illinois, he electronically submitted for filing the foregoing **AMEREN'S MOTION TO EXTEND DISCOVERY PERIOD** with the Illinois Pollution Control Board by using the Clerk's Office On-line (COOL) eFile system. Scott B. Sievers further certifies that, on August 14, 2024, he served the other parties in this case with a copy of the foregoing document by transmitting the document by e-mail to the parties' representatives, who are identified below, at their designated e-mail addresses of record:

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VERIFICATION BY CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters herein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

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BY: s/Scott B. Sievers
Scott B. Sievers
Attorney for Petitioner