

STATE OF ILLINOIS  
ILLINOIS POLLUTION CONTROL BOARD

SIERRA CLUB, ENVIRONMENTAL LAW )  
AND POLICY CENTER, PRAIRIE RIVERS )  
NETWORK, and CITIZENS AGAINST )  
RUINING THE ENVIRONMENT )

Complainant, )

v. )

MIDWEST GENERATION, )

Respondents. )

PCB No-2013-015  
(Enforcement – Water)

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**NOTICE OF FILING**

**Illinois Pollution Control Board\***

Don Brown - Clerk of the Board  
don.brown@illinois.gov  
Brad Halloran - Hearing Officer  
Brad.Halloran@illinois.gov  
100 W. Randolph St.  
Suite 11-500  
Chicago, IL 60601  
312/814-3620  
312/814-3669

PLEASE TAKE NOTICE that I have filed the following Appearance and Verified Statement pursuant to Illinois Supreme Court Rule 707 of Peter Morgan before the Illinois Pollution Control Board in the above-captioned case today, copies of which are hereby served upon you.

Respectfully submitted,

/s/ Faith Bugel

Faith E. Bugel

1004 Mohawk

Wilmette, IL 60091

(312) 282-9119

[fbugel@gmail.com](mailto:fbugel@gmail.com)

*Attorney for Sierra Club*

Dated: March 14, 2022

STATE OF ILLINOIS  
ILLINOIS POLLUTION CONTROL BOARD

SIERRA CLUB, ENVIRONMENTAL LAW )	
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Respondents. )	

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**APPEARANCE OF PETER MORGAN AND**  
**CONSENT TO EMAIL SERVICE**

I hereby enter my appearance on behalf of Complainant Sierra Club. I authorize the service of documents on me by electronic mail in lieu of receiving paper documents in the above-captioned proceeding. My email address to receive service of documents is as follows:  
[peter.morgan@sierraclub.org](mailto:peter.morgan@sierraclub.org).

*/s/ Peter Morgan*  
Peter Morgan

Dated: March 14, 2022

STATE OF ILLINOIS  
ILLINOIS POLLUTION CONTROL BOARD

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Respondents. )	

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**VERIFIED STATEMENT OF PETER MORGAN**  
**PURSUANT TO ILLINOIS SUPREME COURT RULE 707**

I, Peter M. Morgan, submit this Verified Statement pursuant to Illinois Supreme Court Rule 707.

1. My full name is Peter M. Morgan, my date of birth is June 21, 1979. The address of offices from which I practice law and related email address and telephone numbers are as follows:

Sierra Club  
1536 Wynkoop St., Ste. 200  
Denver, CO 80202  
[peter.morgan@sierraclub.org](mailto:peter.morgan@sierraclub.org)  
303-454-3367

2. I represent Sierra Club in Case No. PCB 2013-015 before the Illinois Pollution Control Board.

3(a). I have not filed any other appearance pursuant to this rule during this calendar year.

3(b). I have not received a registration number from the ARDC. I will be appearing in association with Faith Bugel who is licensed and registered to practice before the Illinois State Bar Association (ARDC No. 6255685), and has submitted an Entry of Appearance before the Illinois Pollution Control Board on 07/16/2015 in PCB 2013-015.

4(a). I list each jurisdiction of admission, including any state, territory, or commonwealth of the United States, the District of Columbia, or in a foreign country, and my full admission name and license number.

Colorado State Bar, Peter M. Morgan, 44315  
California State Bar, Peter M. Morgan, 255210

4(b). I attach a letter or certificate of good standing for each of the jurisdictions listed in paragraph 4(a) above.

5. I have no office or other presence in Illinois for the practice of law.

6. I submit to the disciplinary authority of the Supreme Court of Illinois;

7. I have undertaken to become familiar with and to comply, as if admitted to practice in Illinois, with the rules of the Supreme Court of Illinois, including the Illinois Rules of Professional Conduct and the Supreme Court Rules on Admission and Discipline of Attorneys, and other Illinois law and practices that pertain to the proceeding;

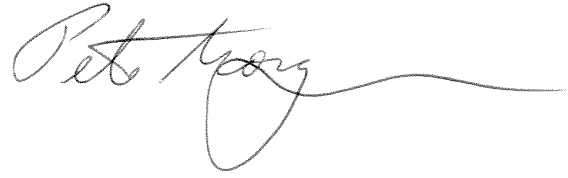
(8) The full name, business address and ARDC number of the Illinois attorney with whom I have associated in the matter is:

Faith E. Bugel (#6255685)  
10004 Mohawk Rd.  
Wilmette, IL 60091  
(312) 282-9119

9. I certify that I have served this Statement upon the Administrator of the Attorney Registration and Disciplinary Commission, the Illinois counsel with whom I am associated in the proceeding, my client, and that these parties are all entitled to service under this rule.

Verification

I verify the accuracy and completeness of each of the above statements.

A handwritten signature in black ink, appearing to read "Peter Morgan", with a long horizontal flourish extending to the right.

Peter Morgan  
Senior Attorney, Sierra Club  
1536 Wynkoop St. Ste. 200  
Denver, CO 80202  
303-454-3367  
[peter.morgan@sierraclub.org](mailto:peter.morgan@sierraclub.org)

Date: March 14, 2022

**CERTIFICATE OF SERVICE**

The undersigned, Faith E. Bugel, an attorney, certifies that a true copy of the following **NOTICE OF FILING** was filed electronically on March 14, 2022 with the following:

**Illinois Pollution Control Board\***

Don Brown - Clerk of the Board  
don.brown@illinois.gov  
Brad Halloran - Hearing Officer  
Brad.Halloran@illinois.gov  
100 W. Randolph St.  
Suite 11-500  
Chicago, IL 60601  
312/814-3620  
312/814-3669

**Nijman Franzetti LLP**

Jennifer T. Nijman  
jn@nijmanfranzetti.com  
Susan M. Franzetti  
sf@nijmanfranzetti.com  
Kristen Laughridge Gale  
kg@nijmanfranzetti.com  
Kelly Emerson  
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10 South LaSalle Street  
Suite 3600  
Chicago, IL 60603  
312/251-5250  
312/251-4610

**Environmental Integrity Project**

Abel Russ - Attorney  
aruss@environmentalintegrity.org  
1000 Vermont Avenue NW  
Suite 1100  
Washington, DC 20005  
202-263-4453

**Environmental Law and Policy Center**

Kiana Courtney  
KCourtney@elpc.org  
Cantrell Jones  
CJones@elpc.org  
35 E. Wacker Drive  
Suite 1600  
Chicago, IL 60601  
312-673-6500

**Sorling, Northrup, Hanna, Cullen & Cochran, Ltd.**

James M. Morphew  
jmmorphew@sorlinglaw.com  
1 North Old State Capitol Plaza, Suite 200  
P.O. Box 5131  
Springfield, IL 62705  
217/544-1144  
217/522-3173

**HeplerBroom LLC\***

Jennifer M. Martin  
Jennifer.Martin@heplerbroom.com  
Melissa S. Brown  
Melissa.brown@heplerbroom.com  
4340 Acer Grove Drive  
Springfield, IL 62711  
217-523-4900  
217-523-4948

**Greater Chicago Legal Clinic, Inc.**

Keith I. Harley  
kharley@kentlaw.edu  
211 West Wacker Drive  
Suite 750  
Chicago, IL 60606  
312-726-2938  
312-726-5206

And that true copies of the **NOTICE OF FILING** and **APPEARANCE OF PETER MORGAN AND CONSENT TO EMAIL SERVICE** were served via electronic mail to the parties on the foregoing service list before 5 p.m. Central Time on March 14, 2022 to the email address of the parties' counsel. The package is 7 pages.

Respectfully submitted,

*/s/ Faith Bugel*

Faith E. Bugel

1004 Mohawk

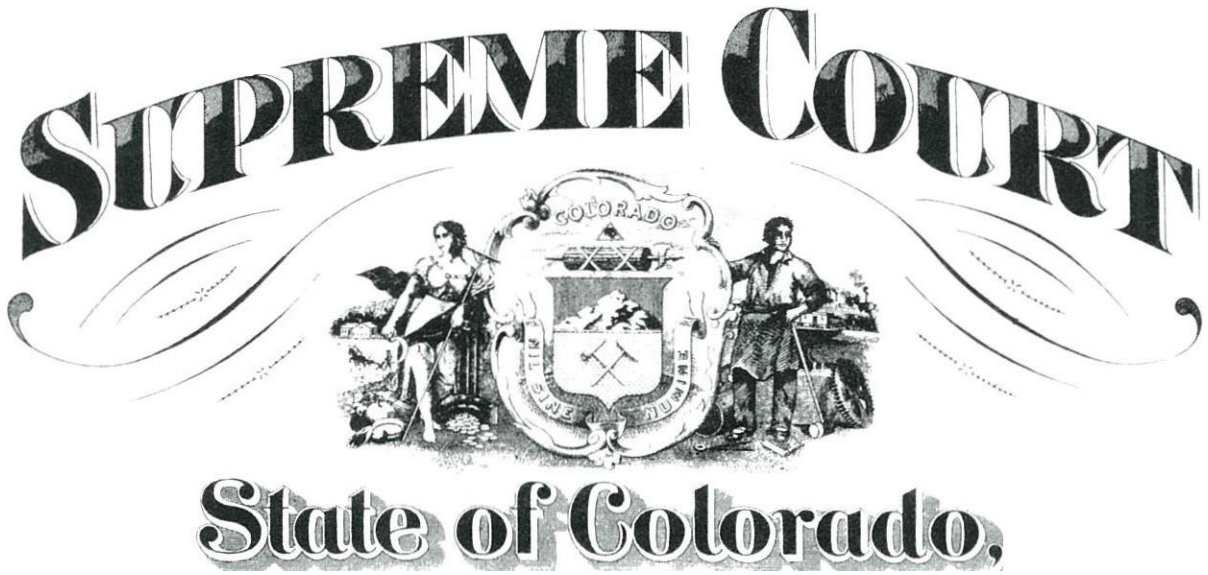
Wilmette, IL 60091

(312) 282-9119

[fbugel@gmail.com](mailto:fbugel@gmail.com)

*Attorney for Sierra Club*





STATE OF COLORADO, ss:

I, Cheryl Stevens, Clerk of the Supreme Court of the State of Colorado, do hereby certify that

Peter M. Morgan

has been duly licensed and admitted to practice as an

*ATTORNEY AND COUNSELOR AT LAW*

within this State; and that his/her name appears upon the Roll of Attorneys

and Counselors at Law in my office of date the 27<sup>th</sup>

day of January A.D. 2012 and that at the date hereof

the said Peter M. Morgan is in good standing at this Bar.



IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the Seal of said Supreme Court, at Denver, in said State, this

1<sup>st</sup> day of March A.D. 2022

Cheryl Stevens

Clerk

By

Marya Sanchez

Deputy Clerk



Electronic Filing: Received, Clerk's Office 3/14/2022

The State Bar  
of California

OFFICE OF ATTORNEY REGULATION &  
CONSUMER RESOURCES

180 Howard Street, San Francisco, CA 94105

AttorneyRegulation@calbar.ca.gov  
888-800-3400

## CERTIFICATE OF STANDING

February 28, 2022

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, PETER M. MORGAN, #255210 was admitted to the practice of law in this state by the Supreme Court of California on February 17, 2008 and has been since that date, and is at date hereof, an ACTIVE licensee of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in blue ink, appearing to read "Alex C".

Alex Calderon  
Custodian of Records