

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF: )  
 )  
PETITION OF AMEREN ENERGY ) PCB AS 2021-008  
 ) (Adjusted Standard – Land)  
MEDIAN VALLEY COGEN LLC (OLD )  
 )  
MEREDOSIA) FOR AN ADJUSTED )  
 )  
STANDARD FROM 35 ADMIN. CODE )  
 )  
PART 845 )

**NOTICE OF FILING**

To: See attached Service List

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Pollution Control Board Agreed Motion to Extend Discovery, a copy of which is herewith served upon you.

Dated: October 18, 2024

AMEREN ENERGY MEDINA VALLEY  
COGEN, LLC

By:     /s/Kristen L. Gale    

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**SERVICE LIST**

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that a true copy of the foregoing Notice of Filing and Agreed Motion to Extend Discovery was electronically filed on October 18, 2024 with the following:

Don Brown, Clerk of the Board  
Illinois Pollution Control Board  
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Chicago, IL 60605  
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and that copies were sent via e-mail on October 18, 2024 to the parties on the service list.

Dated: October 18, 2024

/s/Kristen L. Gale

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**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF: )  
 )  
PETITION OF AMEREN EMERGY MEDIAN ) PCB AS 2021-008  
VALLEY COGEN LLC (OLD MEREDOSIA) ) (Adjusted Standard – Land)  
FOR AN ADJUSTED STANDARD FROM 35 )  
ADMIN. CODE PART 845 )

**AGREED MOTION TO EXTEND DISCOVERY**

Ameren Energy Medina Valley Cogen, LLC (“Ameren”) submits this Agreed Motion to Extend Discovery pursuant to 35 Ill. Adm. Code 101.522. In support thereof, Ameren states as follows:

1. On August 14, 2024, Ameren’s Motion to Extend Discovery Period was filed, and on August 26, 2024, the Hearing Officer granted the unopposed motion, extending the discovery period to October 20, 2024.

2. There is good cause for the extension. After Ameren served the Illinois Environmental Protection Agency (“Illinois EPA”) with interrogatories and requests for production, the Illinois EPA sought a 10-day extension of time to answer the interrogatories and respond to the requests, to which Ameren agreed. Illinois EPA answered Ameren’s interrogatories on September 6, 2024, but sought a two-week extension to September 20, 2024, to respond to its requests for production, to which Ameren agreed. The Agency later requested one additional extension, to October 4, 2024, to provide its requests to produce responses, to which Ameren also agreed. On October 2, 2024, Illinois EPA provided its responses to Ameren’s requests to produce.

3. To allow time to review the Illinois EPA’s discovery answers and document production, and to arrange for depositions, if necessary, Ameren requests that the Hearing Officer extend the discovery deadline by 90 days, to January 18, 2025.

4. Illinois EPA has agreed to the 90-day extension.

WHEREFORE, Ameren Energy Medina Valley Cogen, LLC requests that the Hearing Officer grant its Motion to Extend Discovery by 90 days, to January 18, 2025

Respectfully submitted,

AMEREN ENERGY MEDINA VALLEY  
COGEN, LLC

Petitioner,

By: /s/ Kristen L. Gale  
One of its Attorneys

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