

the Debtors' Powerton and Joliet generating stations and their respective counsel; (j) the lender under Debtor Edison Mission Energy's letter-of-credit facility; (k) the state attorneys general for states in which the Debtors conduct business; (l) United States Attorney for the Northern District of Illinois; (m) the Internal Revenue Service; (n) the Securities and Exchange Commission; (o) the Environmental Protection Agency and similar state environmental agencies for states in which the Debtors conduct business; and (p) those parties who have requested service of papers in this case pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure and the *Order Approving Case Management Procedures* [Docket No. 128].

PLEASE TAKE FURTHER NOTICE that copies of all documents filed in these chapter 11 cases are available free of charge by visiting the case website maintained by GCG, Inc., the Debtors' notice and claims agent for these chapter 11 cases, available at www.edisonmissionrestructuring.com or by calling (866) 241-6491. You may also obtain copies of any pleadings by visiting the Court's website at www.ilnb.uscourts.gov in accordance with the procedures and fees set forth therein.

[Remainder of page intentionally left blank.]

Dated: October 7, 2013

/s/ David R. Seligman, P.C.

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¹ McDonald Hopkins LLC will prosecute the Objection and respond to any responses thereto to the extent that any potential conflict of interest exists with respect to Kirkland & Ellis LLP.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

)		
In re:)	Chapter 11	
)		
EDISON MISSION ENERGY, <u>et al.</u> , ¹)	Case No. 12-49219 (JPC)	
)		
Debtors.)	(Jointly Administered)	
)		

DEBTORS’ FOURTH OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM (AMENDED AND SUPERSEDED CLAIMS, LATE-FILED CLAIMS, AND DUPLICATIVE CLAIM)

THIS OBJECTION SEEKS TO DISALLOW, EXPUNGE, RECLASSIFY, REDUCE, AND/OR MODIFY CERTAIN FILED PROOFS OF CLAIM. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON SCHEDULES 1-3 TO EXHIBIT A ATTACHED TO THIS OBJECTION.

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) respectfully state the following in support of this objection (this “Objection”):

Relief Requested

1. The Debtors seek entry of an order, substantially in the form attached hereto as

Exhibit A (the “Order”):

- expunging and disallowing the claims identified on **Schedule 1** to the Order (collectively, the “Amended and Superseded Claims”) in their entirety because such claims were amended and replaced by the “Surviving Claims” identified on **Schedule 1** to the Order;

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Edison Mission Energy (1807); Camino Energy Company (2601); Chestnut Ridge Energy Company (6590); Edison Mission Energy Fuel Services, LLC (4630); Edison Mission Finance Co. (9202); Edison Mission Fuel Resources, Inc. (3014); Edison Mission Fuel Transportation, Inc. (3012); Edison Mission Holdings Co. (6940); Edison Mission Midwest Holdings Co. (6553); EME Homer City Generation L.P. (6938); Homer City Property Holdings, Inc. (1685); Midwest Finance Corp. (9350); Midwest Generation EME, LLC (1760); Midwest Generation, LLC (8558); Midwest Generation Procurement Services, LLC (2634); Midwest Peaker Holdings, Inc. (5282); Mission Energy Westside, Inc. (0657); San Joaquin Energy Company (1346); Southern Sierra Energy Company (6754); and Western Sierra Energy Company (1447). The location of parent Debtor Edison Mission Energy’s corporate headquarters and the Debtors’ service address is: 3 MacArthur Place, Suite 100, Santa Ana, California 92707.

- expunging and disallowing the claims identified on **Schedule 2** to the Order (collectively, the “Late-Filed Claims”) in their entirety because such claims were not timely filed; and
- expunging and disallowing the claim identified on **Schedule 3** to the Order (the “Duplicative Claim” and, collectively with the Amended and Superseded Claims and Late-Filed Claims, the “Disputed Claims”) in its entirety because it is duplicative of other proofs of claim.

In support of this Objection, the Debtors submit the declaration of Aaron Moss (the “Moss Declaration”), to be filed in connection herewith.

Jurisdiction

2. The United States Bankruptcy Court for the Northern District of Illinois (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The statutory bases for the relief requested herein are sections 502 and 1106(a)(1) of title 11 of the United States Code (the “Bankruptcy Code”), rule 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rule 3007-1 of the Local Rules for the United States Bankruptcy Court for the Northern District of Illinois (the “Local Rules”).

Background

5. Edison Mission Energy, together with its Debtor and non-Debtor affiliates, is a leading independent power producing enterprise specializing in developing, operating, and selling energy and capacity from approximately 40 generating facilities in 12 states and the Republic of Turkey. The Debtors have approximately 800 employees and maintain headquarters in Chicago, Illinois and Santa Ana, California.

6. On December 17, 2012 (the “Original Petition Date”), seventeen of the Debtors (collectively, the “Original Debtors”) filed petitions with the Court under chapter 11 of the Bankruptcy Code. On May 2, 2013 (the “Homer City Petition Date”), three additional Debtors

(collectively, the “Homer City Debtors”)² filed petitions with the Court under chapter 11 of the Bankruptcy Code. The Court has approved procedural consolidation and joint administration of these chapter 11 cases pursuant to Bankruptcy Rule 1015(b) [Docket Nos. 115, 154, 780]. No party has requested the appointment of a trustee or examiner in these chapter 11 cases. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On January 7, 2013, the United States Trustee for the Northern District of Illinois appointed an official committee of unsecured creditors (the “Committee”) in these chapter 11 cases [Docket No. 202] (as amended on January 18, 2013 [Docket No. 308]).

The Claims Reconciliation Process

7. On February 14, 2013 and May 16, 2013, the Original Debtors and the Homer City Debtors, respectively, filed their schedules of assets and liabilities and executory contracts and unexpired leases (as amended, collectively, the “Schedules”) and statements of financial affairs, as required pursuant to section 521 of the Bankruptcy Code. On July 2, 2013, certain Debtors filed amendments to their respective Schedules.

8. On April 10, 2013, the Court entered the *Order (A) Setting the Bar Dates for Filing Proofs of Claim, Including Claims Arising Under 11 U.S.C. § 503(b)(9) Proofs of Claim and (B) Approving the Form and Manner of Notice Thereof* [Docket No. 669] (the “Original Bar Date Order”), which, among other things, established June 17, 2013, as: (a) the deadline (the “General Bar Date”) for all persons and entities holding or wishing to assert a “claim” (as defined in section 101(5) of the Bankruptcy Code) against any of the Original Debtors that arose before the Original Petition Date (each, a “Claim”), including any claim arising under

² The Original Debtors and the Homer City Debtors are collectively referred to in this Objection as the “Debtors.”

section 503(b)(9) of the Bankruptcy Code, to file proof of such Claim in writing; and (b) the deadline (the “Governmental Bar Date”) for all governmental units holding or wishing to assert a Claim against any of the Original Debtors that arose before the Original Petition Date to file proof of such Claim in writing.

9. On August 21, 2013, the Court entered the *Order (A) Setting Bar Dates for Filing Proof of Claim, Including Section 503(b)(9) Claims, Against EME Homer City Generation L.P., Edison Mission Finance Co., and Homer City Property Holdings, Inc. and (B) Approving the Form and Manner of Notice Thereof* [Docket No. 1137] (the “Homer City Bar Date Order” and, together with the Original Bar Date Order, the “Bar Date Orders”), which, among other things, established October 29, 2013, as the deadline for governmental and non-governmental entities to file proofs of claim against the Homer City Debtors. Together, the Bar Date Orders apply to all purported Claims against the Debtors arising before the Original Petition Date and the Homer City Petition Date, as applicable. Notice of the Bar Date Orders was provided in accordance with the procedures outlined therein.

10. On July 17, 2013, the Court approved certain omnibus procedures for filing and resolving objections to Claims asserted against the Debtors in these chapter 11 cases [Docket No. 1022] (the “Objection Procedures”).

11. To date, entities have filed approximately 1,900 proofs of claim against the Debtors on an aggregate basis, collectively asserting more than \$11.87 billion in aggregate liabilities. The Debtors and their advisors are in the process of reviewing the proofs of claim, including supporting documentation, if any, filed together with any proof of claim, and reconciling the proofs of claims with the Debtors’ books and records to determine the validity of the proofs of claim. For the reasons set forth in more detail below, and based on their review to

date, the Debtors have determined that the Disputed Claims should be expunged and disallowed as set forth herein.

Objection

I. Amended and Superseded Claims

12. As set forth in the Moss Declaration, the Debtors have determined that the Amended and Superseded Claims identified on **Exhibit 1** to the Order were amended and replaced by the “Surviving Claims” identified on **Exhibit 1** to the Order. To allow both the Amended and Superseded Claims and Surviving Claims to remain on the claims register would be duplicative and would lead to multiple recoveries on a single Claim. Accordingly, the Debtors respectfully request that the Court enter the Order expunging and disallowing the Amended and Superseded Claims identified on **Schedule 1** to the Order. This Objection does not affect the Surviving Claims identified on **Schedule 1** to the Order.

II. Late-Filed Claims

13. The Original Bar Date Order, among other things, established June 17, 2013 as the General Bar Date and approved the form and manner of service of the notice of the General Bar Date and the procedures for filing proofs of claim (the “Bar Date Notice”). Pursuant to the Bar Date Notice, all persons and entities were instructed to file any proofs of claim in writing so that they are “actually received on or before **June 17, 2013 at 4:00 p.m. (Central Standard Time)** . . . , or be barred from doing so.” See Bar Date Notice at 2 (emphasis in original). On or before the General Bar Date, GCG, Inc., the Debtors’ notice and claims agent, served copies of the Bar Date Notice in accordance with the terms of the Original Bar Date Order on the Debtors’ known creditors and other entities, including each of the claimants asserting the Late-Filed Claims [Docket Nos. 684, 855, 856, and 857].

14. The Debtors object to the Late-Filed Claims identified on **Schedule 2** to the Order. As set forth in the Moss Declaration, each Late-Filed Claim (a) arose before the Original Petition Date, (b) was subject to the General Bar Date, and (c) was filed after the General Bar Date. Moreover, the Debtors have determined that each claimant asserting a Late-Filed Claim was timely served with the Bar Date Notice and, therefore, had adequate notice of the General Bar Date. Accordingly, the Debtors respectfully request that the Court expunge and disallow the Late-Filed Claims identified on **Schedule 2** to the Order in their entirety.

III. Duplicative Claim

15. As set forth in the Moss Declaration, the Debtors have reviewed the Duplicative Claim and determined that the Duplicative Claim duplicates other proofs of claim (the "Surviving Claim") identified on **Schedule 3** to the Order. Failure to disallow and expunge the Duplicative Claim could result in the applicable claimant receiving multiple recoveries against the Debtors, to the detriment of other similarly-situated creditors. Moreover, elimination of such Duplicative Claim will enable the Debtors to maintain a more accurate claims register. Accordingly, the Debtors request that the Court enter the Order expunging and disallowing those Duplicative Claim identified on **Schedule 3** to the Order. This Objection does not affect the Surviving Claim identified on **Schedule 3** to the Order.

Basis for Relief

16. Section 502(a) of the Bankruptcy Code provides that "[a] claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest . . . objects." 11 U.S.C. § 502(a). A debtor in possession has the duty to object to the allowance of any claim that is improper. See 11 U.S.C. § 1106(a)(1).

17. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim under

section 502(a) of the Bankruptcy Code. See In re Salem, 465 F.3d 767, 779 (7th Cir. 2006). To receive the benefit of *prima facie* validity, however, the proof of claim must “set forth facts necessary to support the claim.” In re Stoecker, 143 B.R. 879, 883 (N.D. Ill. 1992), aff’d in part, vacated in part by 5 F.3d 1022 (7th Cir. 1993). Additionally, a claimant’s proof of claim is entitled to the presumption of *prima facie* validity under Bankruptcy Rule 3001(f) only until an objecting party refutes at least one of the allegations that is essential to the claim’s legal sufficiency. See In re Relford, 323 B.R. 669, 672–73 (Bankr. S.D. Ind. 2004). Once such an allegation is refuted, the burden reverts to the claimant to prove the validity of the claim by a preponderance of the evidence. Id. In other words, once the *prima facie* validity of a claim is rebutted, “it is for the claimant to prove his claim, not for the objector to disprove it.” In re Kahn, 114 B.R. 40, 44 (Bankr. S.D.N.Y. 1990) (citations omitted).

18. As set forth herein and in the Moss Declaration, the Court should expunge and disallow the Disputed Claims. If the Duplicative Claims are not formally disallowed and expunged as requested herein, the potential exists for the applicable claimants to receive recoveries to which they are not entitled, to the detriment of the Debtors’ other stakeholders. Thus, this relief is necessary to prevent any inappropriate distribution of estate funds and to facilitate the administration of the claims allowance process.

Compliance with Bankruptcy Rule 3007(e)

19. The Debtors respectfully submit that this Objection complies with the requirements for omnibus objections set forth by Bankruptcy Rule 3007(e). Namely, the Debtors and GCG, Inc., their notice and claims agent, have created a personalized form of notice that shall be served upon each claimant affected by this Objection. Each such notice prominently identifies the claimant’s: (a) name; (b) address; (c) applicable claim number; (d) proposed

treatment pursuant to the Objection; and (e) does not include any other claimant's information on the notice.

20. As a result, each claimant can readily identify its Claim and proposed treatment and respond accordingly. The proposed form of Order further identifies each claimant by category of claims subject to objection. This Objection conspicuously identifies the Debtors as the objecting parties, identifies this Objection as the Debtors' fourth omnibus claims objection, and contains objections to fewer than 100 Claims. Accordingly, the Debtors respectfully submit that this Objection complies with Bankruptcy Rule 3007(e).

Separate Contested Matter

21. Each of the above objections to the proofs of claim constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. The Debtors request that any order entered by the Court with respect to an objection asserted herein shall be deemed a separate order with respect to each Claim.

Reservation of Rights

22. The Debtors expressly reserve the right to amend, modify, or supplement this Objection and to file additional substantive or non-substantive objections to the Claims objected to herein, or any other Claims, filed or not, which may be asserted against the Debtors. Should one or more of the grounds of objection stated in this Objection be overruled, the Debtors reserve the right to object on any other applicable grounds. In addition, the Debtors reserve the right to seek to reduce any Claim for any reason, including to the extent such Claim has been paid. The Debtors reserve the right to raise further objections, including objections under section 502(d) of the Bankruptcy Code. Nothing in this Objection or the relief requested herein shall limit the right of the Debtors, the Committee, or the ad hoc committee of certain holders of the Debtors'

senior unsecured notes (the “Noteholder Group”) to bring future and/or additional objections to any of the Disputed Claims on any basis.

Notice

23. The Debtors have provided notice of this Objection to: (a) the Office of the United States Trustee for the Northern District of Illinois; (b) holders of Disputed Claims identified on **Schedules 1–3** to the Order; (c) counsel to the Committee; (d) the indenture trustee for the Debtors’ senior unsecured notes; (e) counsel to the Noteholder Group; (f) the indenture trustee for the lessor notes related to the Debtors’ Powerton generating station in Pekin, Illinois, and units 7 and 8 of the Debtors’ Joliet, Illinois, generating station and the pass-through trustee for the related pass-through certificates; (g) counsel to the ad hoc committee of certain holders of pass-through certificates related to the Debtors’ Powerton and Joliet generating stations; (h) the owner trusts and the equity investors for the Debtors’ Powerton and Joliet generating stations and their respective counsel; (i) the lender under Debtor Edison Mission Energy’s letter-of-credit facility; (j) the state attorneys general for states in which the Debtors conduct business; (k) United States Attorney for the Northern District of Illinois; (l) the Internal Revenue Service; (m) the Securities and Exchange Commission; and (n) the Environmental Protection Agency and similar state environmental agencies for states in which the Debtors conduct business. In light of the nature of the relief requested herein, the Debtors respectfully submit that no further notice is necessary.

[Remainder of page intentionally left blank.]

WHEREFORE, the Debtors respectfully request that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, granting the related relief requested herein and such other and further relief as the Court deems appropriate.

Dated: October 7, 2013

/s/ David R. Seligman, P.C.

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and Debtors in Possession*

Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
Eastern Division

In Re:)	BK No.: 12-49219
EDISON MISSION ENERGY, et al.,)	(Jointly Administered)
)	Chapter: 11
)	Honorable Jacqueline Cox
)	
Debtor(s))	

Re: Docket No. ____

**ORDER GRANTING DEBTORS' OMNIBUS OBJECTION TO
CERTAIN PROOFS OF CLAIM (AMENDED AND SUPERSEDED
CLAIMS, LATE-FILED CLAIMS, AND DUPLICATIVE CLAIM)**

Upon the objection (the "Objection") of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order (this "Order") disallowing and expunging the Disputed Claims identified on Schedules 1–3 attached hereto, pursuant to sections 502 and 1106(a)(1) of the Bankruptcy Code, Bankruptcy Rule 3007, Local Rule 3007-1, and the Objection Procedures, all as more fully set forth in the Objection; and the Court having found that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Objection is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and the Court having found that the Debtors provided appropriate notice of the Objection and the opportunity for a hearing on the Objection under the circumstances; and the Court having reviewed the Objection and the Moss Declaration and having heard the statements in support of the relief requested therein at a hearing before the Court (the "Hearing"); and the Court having determined that the legal and factual bases set forth in the Objection and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

1. The Objection is granted as set forth herein. Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Objection.
2. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on its merits.
3. The Amended and Superseded Claims identified on Schedule 1 attached hereto are expunged and disallowed in their entirety; provided, however, this Order shall not affect the "Surviving Claims" identified on Schedule 1 attached hereto.
4. The Late-Filed Claims identified on Schedule 2 attached hereto are expunged and disallowed in their entirety; provided, however, the expungement and disallowance of the Late-Filed Claims identified on Schedule 2 shall have no effect on the applicable claimant's scheduled Claim to the extent such claim is not designated as contingent, unliquidated, or disputed on the applicable Debtor's Schedules.

5. The Duplicative Claim identified on Schedule 3 attached hereto is disallowed and expunged in its entirety; provided, however, this Order shall not affect the “Surviving Claim” identified on Schedule 3 attached hereto.

6. GCG, Inc., the Debtor’s notice and claims agent, is directed to update the claims register to reflect the relief granted in this Order.

7. Except as provided in this Order, nothing in this Order shall be deemed: (a) an admission or finding as to the validity of any claim against a Debtor entity; (b) a waiver of the right of the Debtors, the Committee, or the Noteholder Group to dispute any claim against any Debtor on any grounds whatsoever, at a later date; (c) a promise by or requirement on any Debtor to pay any claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; or (e) a waiver of the rights of the Debtors, the Committee, or the Noteholder Group under the Bankruptcy Code or any other applicable law.

8. Each Claim and the objections by the Debtors to such Claim, as addressed in the Objection and set forth on Schedules 1–3 hereto, constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such Claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters identified in the Objection or this Order.

9. The Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.

10. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Enter:

Dated:

United States Bankruptcy Judge

Prepared by:

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Schedule 1

Amended and Superseded Claims

Schedule 1 - Amended & Superseded Claims

Fourth Omnibus Objection to Claims

Edison Mission Energy, et al.
12-049219 (JPC)

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			SURVIVING CLAIM(S)			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	NAME	CLAIM NO.	CLAIM AMOUNT	
1	ATLANTIC PLANT SERVICES, LLC. 2210 OAK LEAF STREET JOLIET, IL 60436 Date Filed: 05/15/13 Debtor: Midwest Generation, LLC	656	Unsecured: \$30,522.04	ATLANTIC PLANT SERVICES LLC 2210 OAK LEAF ST JOLIET, IL 60436 Date Filed: 10/02/13 Debtor: Midwest Generation, LLC	1922	Unsecured: \$9,704.52	Pg 5
2	BENETECH INC 2245 SEQUOIA DR STE 300 AURORA, IL 60506 Date Filed: 06/17/13 Debtor: Midwest Generation, LLC	1600	503(b)(9): \$2,398.34 Unsecured: \$25,656.62	BENETECH INC 2245 SEQUOIA DR STE 300 AURORA, IL 60506 Date Filed: 09/03/13 Debtor: Midwest Generation, LLC	1863	Unsecured: \$25,656.62	Pg 5
3	BIODIVERSITY PROJECT 4507 N RAVENSWOOD AVE STE 106 CHICAGO, IL 60640 Date Filed: 06/07/13 Debtor: Midwest Generation, LLC	1066	503(b)(9): \$2,004.95	BIODIVERSITY PROJECT 4507 N RAVENSWOOD AVE STE 106 CHICAGO, IL 60640 Date Filed: 09/26/13 Debtor: Midwest Generation, LLC	1912	Unsecured: \$2,004.95	Pg 5
4	BRIESER CONSTRUCTION COMPANY ATTN BRENT SOUTHALL 24101 S. MUNICIPAL DRIVE CHANNAHON, IL 60410 Date Filed: 06/17/13 Debtor: Midwest Generation, LLC	1618	Admin: \$41,173.10 Unsecured: \$11,661.50	BRIESER CONSTRUCTION COMPANY ATTN BRENT SOUTHALL 24101 S MUNICIPAL DR CHANNAHON, IL 60410 Date Filed: 09/30/13 Debtor: Midwest Generation, LLC	1918	Unsecured: \$44,283.05	Pg 5
5	COMMONWEALTH OF VIRGINIA DEPT OF TAXATION PO BOX 2156 RICHMOND, VA 23218 Date Filed: 02/26/13 Debtor: Edison Mission Energy	63	Priority: \$52.88 Unsecured: \$372.60	COMMONWEALTH OF VIRGINIA DEPARTMENT OF TAXATION PO BOX 2156 RICHMOND, VA 23218 Date Filed: 09/10/13 Debtor: Edison Mission Energy	1899	Priority: \$0.00 Unsecured: \$0.00	Pg 5
6	COZEN O'CONNOR C/O SANDRA BLOCH, ESQ 1900 MARKET ST PHILADELPHIA, PA 19103 Date Filed: 05/20/13 Debtor: Edison Mission Energy	739	Unsecured: \$5,488.50	COZEN O'CONNOR C/O SANDRA BLOCH, ESQ 1900 MARKET ST PHILADELPHIA, PA 19103 Date Filed: 09/19/13 Debtor: Edison Mission Energy	1904	Unsecured: \$5,218.50	Pg 5

Schedule 1 - Amended & Superseded Claims

Fourth Omnibus Objection to Claims

Edison Mission Energy, et al.
12-049219 (JPC)

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			SURVIVING CLAIM(S)			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	NAME	CLAIM NO.	CLAIM AMOUNT	
7	DELL MARKETING LP ONE DELL WAY RR1, MS52 ROUND ROCK, TX 78682 Date Filed: 01/28/13 Debtor: Edison Mission Energy	3	Unsecured: \$12,101.06	DELL MARKETING LP ONE DELL WAY RR1 MS 52 ROUND ROCK, TX 78682 Date Filed: 09/17/13 Debtor: Midwest Generation EME, LLC	1902	Unsecured: \$1,120.94	Pg 5
				DELL MARKETING LP ONE DELL WAY RR1 MS 52 ROUND ROCK, TX 78682 Date Filed: 09/17/13 Debtor: Midwest Generation, LLC			
8	EM SMITH & CO C/O JOHNSON BUNCE & NOBLE PC 7800 N SOMMER ST STE 425 PEORIA, IL 61615 Date Filed: 02/07/13 Debtor: Edison Mission Energy	43	Unsecured: \$10,424.00	EM SMITH & CO C/O JOHNSON BUNCE & NOBLE PC 7800 N SOMMER ST STE 425 PEORIA, IL 61615 Date Filed: 09/16/13 Debtor: Midwest Generation, LLC	1901	Unsecured: \$9,274.00	Pg 5
9	EMC CORPORATION C/O RECEIVABLE MANAGEMENT SERVICES PO BOX 5126 TIMONIUM, MD 21094 Date Filed: 01/31/13 Debtor: Edison Mission Energy	7	Admin: \$19,203.17 Unsecured: \$176,495.07	EMC CORPORATION C/O RECEIVABLE MANAGEMENT SERVICES (RMS) PO BOX 5126 TIMONIUM, MD 21094 Date Filed: 09/30/13 Debtor: Edison Mission Energy	1921	Unsecured: \$185,383.39	Pg 5
10	EXPRO SPECIALIZED SERVICES 703 EDC DR GREENUP, KY 41144 Date Filed: 05/01/13 Debtor: Midwest Generation, LLC	252	503(b)(9): \$30,512.00	EXPRO SPECIALIZED SERVICES PO BOX 417 WORTHINGTON, KY 41183 Date Filed: 09/20/13 Debtor: Midwest Generation, LLC	1906	Unsecured: \$30,512.00	Pg 5
11	INFILCO DEGREMONT INC 8007 DISCOVERY DRIVE RICHMOND, VA 23229 Date Filed: 06/14/13 Debtor: Midwest Generation, LLC	1462	503(b)(9): \$24,997.12 Secured: Unliquidated	INFILCO DEGREMONT INC 8007 DISCOVERY DR RICHMOND, VA 23229 Date Filed: 09/27/13 Debtor: Midwest Generation, LLC	1914	503(b)(9): \$21,078.62 Unsecured: \$3,918.50	Pg 5

Schedule 1 - Amended & Superseded Claims

Fourth Omnibus Objection to Claims

Edison Mission Energy, et al.
12-049219 (JPC)

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			SURVIVING CLAIM(S)			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	NAME	CLAIM NO.	CLAIM AMOUNT	
12	J. L. MEECE ENGINEERING, INC. C/O ASM CAPITAL LP 7600 JERICHO TURNPIKE SUITE 302 WOODBURY, NY 11797 TRANSFEROR: J. L. MEECE ENGINEERING, INC. 760 S BROADWAY ST COAL CITY, IL 60416 Date Filed: 05/07/13 Debtor: Edison Mission Energy	433	503(b)(9): \$3,000.00	ASM CAPITAL 7600 JERICHO TURNPIKE STE 302 WOODBURY, NY 11797 Date Filed: 09/28/13 Debtor: Midwest Generation, LLC	1916	Unsecured: \$3,000.00	Pg 5
13	JJ KOU INC DBA KOURI'S PUB ATTN JIM KOURI 2929 COURT ST PEKIN, IL 61554 Date Filed: 05/07/13 Debtor: Midwest Generation, LLC	437	503(b)(9): \$5,355.65	JJ KOU INC DBA KOURI'S PUB ATTN JIM KOURI 2929 COURT ST PEKIN, IL 61554 Date Filed: 09/23/13 Debtor: Midwest Generation, LLC	1908	503(b)(9): \$2,132.28 Unsecured: \$2,960.00	Pg 5
14	LATISYS-IRVINE, LLC ATTN DAVE STEVENS 393 INVERNESS PARKWAY ENGLEWOOD, CO 80112 Date Filed: 06/10/13 Debtor: Edison Mission Energy	1092	Unsecured: \$32,150.07	LATISYS-IRVINE LLC ATTN DAVE STEVENS 393 INVERNESS PKWY ENGLEWOOD, CO 80112 Date Filed: 09/24/13 Debtor: Edison Mission Energy	1910	Unsecured: \$31,045.07	Pg 5
15	LATISYS-IRVINE, LLC ATTN DAVE STEVENS 393 INVERNESS PARKWAY ENGLEWOOD, CO 80112 Date Filed: 06/10/13 Debtor: Midwest Generation EME, LLC	1093	Unsecured: \$19,387.47	LATISYS-IRVINE LLC ATTN DAVE STEVENS 393 INVERNESS PKWY ENGLEWOOD, CO 80112 Date Filed: 09/24/13 Debtor: Midwest Generation EME, LLC	1909	Unsecured: \$20,492.47	Pg 5
16	NATURAL RESOURCE TECHNOLOGY, INC. 23713 W. PAUL ROAD SUITE D PEWAUKEE, WI 53072 Date Filed: 05/29/13 Debtor: Midwest Generation EME, LLC	839	503(b)(9): \$5,062.98	NATURAL RESOURCE TECHNOLOGY INC 234 W FLORIDA ST FIFTH FL MILWAUKEE, WI 53204 Date Filed: 09/13/13 Debtor: Midwest Generation, LLC	1897	Unsecured: \$5,062.98	Pg 5

Schedule 1 - Amended & Superseded Claims

Fourth Omnibus Objection to Claims

**Edison Mission Energy, et al.
 12-049219 (JPC)**

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			SURVIVING CLAIM(S)			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	NAME	CLAIM NO.	CLAIM AMOUNT	
17	NOVA MACHINE PRODUCTS, INC. 18001 SHELDON RD MIDDLEBURG HEIGHTS, OH 44130 Date Filed: 05/14/13 Debtor: Edison Mission Energy	624	503(b)(9): \$7,655.71	NOVA MACHINE PRODUCTS INC 18001 SHELDON RD MIDDLEBURG HEIGHTS, OH 44130 Date Filed: 09/27/13 Debtor: Midwest Generation, LLC	1913	503(b)(9): \$2,149.32 Unsecured: \$5,506.39	Pg 5
18	ONSITE COMMUNICATIONS USA, INC 9512 179TH ST TINLEY PARK, IL 60487 Date Filed: 05/08/13 Debtor: Midwest Generation, LLC	481	Unsecured: \$16,996.84	ONSITE COMMUNICATIONS USA INC 17347 OLEANDER AVE TINLEY PARK, IL 60477 Date Filed: 09/14/13 Debtor: Midwest Generation, LLC	1900	Unsecured: \$16,966.84	Pg 5
19	OUTBACK IMAGING UK LIMITED 96A PHILBEACH GARDENS EARLS COURT SW5 9 ET UNITED KINGDOM Date Filed: 02/25/13 Debtor: Edison Mission Energy	1757	Unsecured: \$26,160.00	OUTBACK IMAGING UK LIMITED 96A PHILBEACH GARDENS EARLS COURT SW5 9ET UNITED KINGDOM Date Filed: 09/13/13 Debtor: Edison Mission Energy	1898	Unsecured: \$2,006.79	Pg 5
20	PENNSYLVANIA ELECTRIC COMPANY C/O FIRSTENERGY CORP ATTN DAVID S WINSTON, MANAGING COUNSEL 76 S MAIN ST AKRON, OH 44308 Date Filed: 06/17/13 Debtor: EME Homer City Generation L.P.	1686	Unsecured: Unliquidated	PENNSYLVANIA ELECTRIC COMPANY C/O FIRSTENERGY CORP ATTN DAVID S WINSTON, MANAGING COUNSEL 76 S MAIN ST AKRON, OH 44308 Date Filed: 09/13/13 Debtor: EME Homer City Generation L.P.	1896	Unsecured: Unliquidated	Pg 5
21	PENNSYLVANIA ELECTRIC COMPANY C/O FIRSTENERGY CORP ATTN DAVID S WINSTON, MANAGING COUNSEL 76 SOUTH MAIN STREET AKRON, OH 44308 Date Filed: 06/17/13 Debtor: Edison Mission Energy	1688	Unsecured: Unliquidated	PENNSYLVANIA ELECTRIC COMPANY C/O FIRSTENERGY CORP ATTN DAVID S WINSTON, MANAGING COUNSEL 76 S MAIN ST AKRON, OH 44308 Date Filed: 09/13/13 Debtor: Edison Mission Energy	1894	Unsecured: Unliquidated	Pg 5
22	PENNSYLVANIA ELECTRIC COMPANY C/O FIRSTENERGY CORP ATTN DAVID S WINSTON 76 S. MAIN STREET AKRON, OH 44308 Date Filed: 06/17/13 Debtor: Mission Energy Westside, Inc.	1687	Unsecured: Unliquidated	PENNSYLVANIA ELECTRIC COMPANY C/O FIRSTENERGY CORP ATTN DAVID S WINSTON, MANAGING COUNSEL 76 S MAIN ST AKRON, OH 44308 Date Filed: 09/13/13 Debtor: Mission Energy Westside, Inc.	1895	Unsecured: Unliquidated	Pg 5

Schedule 1 - Amended & Superseded Claims

Fourth Omnibus Objection to Claims

**Edison Mission Energy, et al.
12-049219 (JPC)**

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			SURVIVING CLAIM(S)			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	NAME	CLAIM NO.	CLAIM AMOUNT	
23	ROSEMOUNT ANALYTICAL INC C/O EMERSON PROCESS MANAGEMENT LLLP ATTN TYLER CHESTNUT 8000 NORMAN CTR DR STE 1200 BLOOMINGTON, MN 55347 Date Filed: 01/30/13 Debtor: Midwest Generation, LLC	4	Admin: \$1,420.00	ROSEMOUNT ANALYTICAL INC C/O EMERSON PROCESS MANAGMENT LLLP ATTN TYLER CHESTNUT 8000 NORMAN CTR DR STE 1200 BLOOMINGTON, MN 55347 Date Filed: 09/30/13 Debtor: Midwest Generation, LLC	1920	Unsecured: \$1,420.00	Pg 5
24	ROSEMOUNT ANALYTICAL INC POWER AND WATER SOLUTIONS C/O EMERSON PROCESS MANAGEMENT LLLP ATTN TYLER CHESTNUT 8000 NORMAN CENTER DR STE 1200 BLOOMINGTON, MN 55347 Date Filed: 01/30/13 Debtor: Midwest Generation, LLC	5	Admin: \$9,682.64 Unsecured: \$18,222.75	EPM POWER AND WATER SOLUTIONS C/O EMERSON PROCESS MANAGEMENT LLLP ATTN TYLER CHESTNUT 8000 NORMAN CTR DR STE 1200 BLOOMINGTON, MN 55347 Date Filed: 09/30/13 Debtor: Midwest Generation, LLC	1919	Unsecured: \$27,905.39	Pg 5
25	ROTATING EQUIPMENT SERVICES, INC. 28 N WEST RD LOMBARD, IL 60148 Date Filed: 05/01/13 Debtor: Midwest Generation, LLC	249	Priority: \$31,892.51	ROTATING EQUIPMENT SERVICES INC 28 N WEST RD LOMBARD, IL 60148 Date Filed: 09/27/13 Debtor: Midwest Generation, LLC	1915	Unsecured: \$31,892.51	Pg 5
26	SAIC ENERGY, ENVIRONMENT & INFRASTRUCTURE, LLC 9400 BROADWAY EXT STE 300 OKLAHOMA CITY, OK 73114 Date Filed: 05/14/13 Debtor: Midwest Generation EME, LLC	628	Unsecured: \$3,888.31	SAIC ENERGY ENVIRONMENT & INFRASTRUCTURE LLC 9400 BROADWAY EXT STE 300 OKLAHOMA CITY, OK 73114 Date Filed: 08/31/13 Debtor: Midwest Generation, LLC	1861	Unsecured: \$2,775.98	Pg 5
27	SIEMENS ENERGY INC ATTN RONALD J MCNUTT 4400 ALAFAYA TRAIL MC Q2-196 ORLANDO, FL 32826 Date Filed: 02/05/13 Debtor: Edison Mission Energy	52	Unsecured: \$24,489.56	SIEMENS ENERGY INC 4400 ALAFAYA TRL MC Q2-196 ORLANDO, FL 32826 Date Filed: 08/28/13 Debtor: Midwest Generation, LLC	1855	Unsecured: \$24,158.06	Pg 5
28	THERMAL ENGINEERING INTERNATIONAL USA INC 10375 SLUSHER DR SANTA FE SPRINGS, CA 90670 Date Filed: 06/14/13 Debtor: Midwest Generation, LLC	1454	503(b)(9): \$37,937.50	THERMAL ENGINEERING INTERNATIONAL USA INC 10375 SLUSHER DR SANTA FE SPRINGS, CA 90670 Date Filed: 09/30/13 Debtor: Midwest Generation, LLC	1917	503(b)(9): \$6,937.50 Unsecured: \$31,000.00	Pg 5

Schedule 1 - Amended & Superseded Claims

Fourth Omnibus Objection to Claims

Edison Mission Energy, et al.
12-049219 (JPC)

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			SURVIVING CLAIM(S)			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	NAME	CLAIM NO.	CLAIM AMOUNT	
29	WW GRAINGER INC 7300 N MELVINA MES17840146864 NILES, IL 60714 Date Filed: 02/20/13 Debtor: Midwest Generation, LLC	19	503(b)(9): \$19,348.89 Unsecured: \$11,806.30*	WW GRAINGER INC 7300 N MELVINA MES17840146864 NILES, IL 60714 Date Filed: 09/24/13 Debtor: Midwest Generation, LLC	1911	503(b)(9): \$9,472.80 Unsecured: \$7,693.75	Pg 5

Total: \$667,520.13

* Denotes an unliquidated component.

Schedule 2

Late-Filed Claims

Schedule 2 - Late Filed Claims

Fourth Omnibus Objection to Claims

Edison Mission Energy, et al.
12-049219 (JPC)

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM(S) TO BE DISALLOWED & EXPUNGED			OBJECTION PAGE NO.
	NAME	CLAIM NO.	CLAIM AMOUNT	REFERENCE
1	RAILWORKS TRACK SERVICES, INC. 512 TWIN RAIL DRIVE SUITE 400 MINOOKA, IL 60447 Date Filed: 08/15/13 Debtor: Midwest Generation, LLC	1848	503(b)(9): \$21,635.00 Unsecured: \$27,910.46	Pgs 5 - 6
2	PSI 850 POPLAR ST PITTSBURGH, PA 15220 Date Filed: 07/06/13 Debtor: Midwest Generation, LLC	1794	Unsecured: \$716.00	Pgs 5 - 6
3	RICOH USA 3920 ARKWRIGHT RD STE 400 MACON, GA 31210 Date Filed: 06/25/13 Debtor: Edison Mission Energy	1790	Unsecured: \$55,675.36	Pgs 5 - 6

Total: \$105,936.82

Schedule 3

Duplicative Claim

Schedule 3 - Duplicative Claim

Fourth Omnibus Objection to Claims

Edison Mission Energy, et al.
 12-049219 (JPC)

Note: Claimants are listed alphabetically.

SEQ NO.	CLAIM TO BE DISALLOWED & EXPUNGED			SURVIVING CLAIM			OBJECTION PAGE NO. REFERENCE
	NAME	CLAIM NO.	CLAIM AMOUNT	NAME	CLAIM NO.	CLAIM AMOUNT	
1	AMERICAN INFOSOURCE LP AS AGENT FOR T-MOBILE/T-MOBILE USA INC PO BOX 248848 OKLAHOMA CITY, OK 73124 Date Filed: 03/01/13 Debtor: Midwest Generation EME, LLC	25	Unsecured: \$223.94	AMERICAN INFOSOURCE LP AS AGENT FOR T MOBILE/T-MOBILE USA INC PO BOX 248848 OKLAHOMA CITY, OK 73124 Date Filed: 02/15/13 Debtor: Midwest Generation EME, LLC	13	Unsecured: \$223.94	Pg 6

Total: \$223.94