

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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

**NOTICE OF EDISON’S RESPONSE AND RESERVATION OF RIGHTS TO EME
REORGANIZATION TRUST’S MOTION TO TERMINATE THE EME
REORGANIZATION TRUST AND FOR ENTRY OF A FINAL DECREE CLOSING
CERTAIN CHAPTER 11 CASES**

PLEASE TAKE NOTICE that, on December 1, 2016, the EME Reorganization Trust filed the *Notice of Motion of the EME Reorganization Trust to Terminate the EME Reorganization Trust and for Entry of a Final Decree Closing Certain Chapter 11 Cases* [Docket No. 2667] (the “Motion”).

PLEASE TAKE FURTHER NOTICE that Edison International, Inc. hereby files *Edison’s Response and Reservation of Rights to EME Reorganization Trust’s Motion to Terminate the EME Reorganization Trust and for Entry of a Final Decree Closing Certain Chapter 11 Cases* (“Response”).

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion is scheduled for **December 22, 2016, at 9:30 a.m. (Central Time)** before the Honorable Bankruptcy Judge Jacqueline P. Cox, Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Courtroom 680, Chicago, Illinois, 60604.

PLEASE TAKE FURTHER NOTICE that copies of all publicly available documents filed in these chapter 11 cases are available free of charge by visiting the case website

* 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 Finance Co. (9202); Edison Mission Energy Fuel Services, LLC (4630); 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 service address of the Reorganization Trust is: EME Reorganization Trust, c/o Akin Gump Strauss Hauer & Feld LLP, Attn: James Savin, 1333 New Hampshire Avenue NW, Washington, DC 20036.

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.

Dated: December 15, 2016

/s/ Seth Goldman

Seth Goldman

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Counsel to Edison International, Inc. and Certain Subsidiaries

**UNITED STATES BANKRUPTCY COURT
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In re)	Chapter 11
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EDISON MISSION ENERGY, <u>et al.</u> , [†])	Case No. 12-49219 (JPC)
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**EDISON’S RESPONSE AND RESERVATION OF RIGHTS TO THE MOTIN OF THE
EME REORGANIZATION TRUSTS TO TERMINATE THE EME REORGANIZATION
TRUST AND FOR ENTRY OF A FINAL DECREE CLOSING CERTAIN CHAPTER 11
CASES**

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[†] 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 Finance Co. (9202); Edison Mission Energy Fuel Services, LLC (4630); 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.

I. RESPONSE AND RESERVATION OF RIGHTS

1. Edison International (“EIX”), for itself and for its subsidiaries (collectively, “Edison”), files this Response and Reservation of Rights to the Motion of the EME Reorganization Trust to Terminate the EME Reorganization Trust and for Entry of a Final Decree Closing Certain Chapter 11 Cases (Docket No. 2667) (“Motion”).

2. Edison supports the Motion as filed. In particular, as noted in the Motion, Edison has no objection to the request by the EME Reorganization Trust to destroy the Trust Records (as defined in the Motion). Edison files this reservation of rights in the event that the relief requested in the Motion is changed such that the EME Reorganization Trust will not either continue to store or destroy the Trust Records.

Dated: December 15, 2016

/s/ Seth Goldman

Seth Goldman

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