

October 17, 2001

FILED

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VIA FEDERAL EXPRESS



Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street, Suite 100
Jefferson City, MO 65101

Missouri Public
Service Commission

Re: In the matter of the Application of Union Electric Company
(d/b/a AmerenUE) for an Order Authorizing It to Withdraw
from the Midwest ISO to Participate in the Alliance RTO
Case No. EO-2001-684

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are an original and eight (8) copies of AmerenUE's Motion to Reopen the Record and To Make Late Filing of Exhibit.

Please kindly acknowledge receipt of this filing by stamping as filed a copy of this letter and returning it to the undersigned in the enclosed, self-addressed, stamped envelope.

Sincerely,

A handwritten signature in cursive script, appearing to read "David B. Hennen".

David B. Hennen
Associate General Counsel

DBH:rd

Enclosures

cc: Parties of Record

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the matter of the Application of Union)	
Electric Company (d/b/a AmerenUE) for an)	
Order Authorizing It to withdraw from the)	Case No. EO-2001-684
Midwest ISO to Participate in the Alliance RTO)	

**MOTION TO REOPEN THE RECORD
AND TO MAKE LATE FILING OF EXHIBIT**

COMES NOW Union Electric Company d/b/a AmerenUE ("Company" or "UE") and pursuant to 4 CSR 240-2.110(8) and 4 CSR 240-2.130(17), respectfully requests the Missouri Public Service Commission ("Commission") to reopen the record to allow the Company to make a late filing of an exhibit in this case, and in support thereof states the following:

1. On October 10, 2001, in accordance with the Commission's Order Adopting Procedural Schedule, issued August 15, 2001, a hearing was conducted in this case before the presiding officer and the Commission.
2. Because the exhibit UE is requesting to file through this motion was not available until it was filed with the Federal Energy Regulatory Commission on October 12, 2001, UE was unable to submit the exhibit into evidence at the hearing.
3. The attached exhibit is an Offer of Settlement that represents the culmination of discussions held on August 14, August 21, September 11, and September 25, 2001 between the Alliance Companies and various other parties concerning the immediate formation of the Stakeholder Advisory Committee for the Alliance RTO. The negotiations concluded during a telephone conference held on October 10, 2001 in which the Federal Energy Regulatory Commission's Dispute Resolution Service (hereinafter "DRS") representatives participated. Based

on the DRS discussions, the Alliance Companies expect that the State Commissions and most other parties that participated will support the offer.


4. Since the formation and input of a Stakeholder Advisory Committee has been identified by a number of parties in this case as an important aspect of Regional Transmission Organization formation, the offer contained in this Offer of Settlement to immediately form a Stakeholder Advisory Committee should be instrumental to the Commission in deciding this case.

5. Moreover, because the discussions by the parties in the DRS process were confidential, UE was precluded from providing any information regarding the progress being made during these DRS proceedings until the filing UE is seeking to admit into evidence in this proceeding was actually made.

WHEREFORE, for the foregoing reasons, Union Electric Company d/b/a AmerenUE hereby requests that the Commission reopen the record and accept the late filing of its exhibit in this case.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

By: 

David Hennen, MBE #46776
Associate General Counsel
Ameren Services Company
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Dated: October 17, 2001

Vinson & Elkins

ATTORNEYS AT LAW

ORIGINAL COPY

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October 12, 2001

VIA MESSENGER

The Honorable David P. Boergers
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: **Docket No. RT01-88-000**
Alliance Companies' Offer of Settlement

Dear Mr. Boergers:

Pursuant to Rule 602 of the Commission's Rules of Practice and Procedure, please accept this original and fourteen copies of the Alliance Companies' Offer of Settlement in the above-referenced proceeding. The Offer of Settlement which addresses principles for the formation of the Alliance Advisory Committee reflects what the Alliance Companies believe is a consensus with stakeholders participating in discussions under the guidance of the Commission's Dispute Resolution Services. Comments on the Offer of Settlement are due within 20 days of this filing, or November 1, 2001. Copies of this Offer are being served on the Commission's official service list in Docket No. RT01-88-000. A notice of filing on diskette and is enclosed.

In an important and related matter, the Alliance Companies urge the Commission to act expeditiously to approve the Alliance Business Plan filed in this proceeding on August 27, 2001, as well as National Grid's Petition for Declaratory Order filed in Docket No. EL01-80-000 on August 27, 2001. The Alliance Companies cannot finalize the corporate documents necessary for National Grid to become the managing member of Alliance Transmission Company, LLC ("Alliance Transco") until the Commission acts in these proceedings. Commission action on these filings is also necessary to having an independent decision-maker in place for the remainder of the Alliance RTO start-up phase. In compliance with the Commission's July 12, 2001 Order, *Alliance Companies, et al.*, 96 FERC ¶ 61,052 (2001), the Alliance Companies: (i) have not made decisions or undertaken activities related to market design or other matters not previously approved by the Commission for the Alliance RTO, and (ii) have presented a proposal in the Business Plan to establish independence during the interim period before Alliance Transco is formed, and, continuously, thereafter.

With National Grid as its managing member, Alliance Transco will be an important contributor to the Commission's policy initiatives for achieving a nation-wide seamless market. Alliance Transco will provide transmission service and perform the functions required of RTOs

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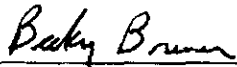
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WASHINGTON, D.C. AUSTIN BEIRING DALLAS HOUSTON LONDON MOSCOW NEW YORK SINGAPORE

The Honorable David P. Boergers
Page 2
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under Order No. 2000 for a geographic area that begins with the outer banks of North Carolina and stretches beyond the Gateway Arch in St. Louis, taking in such major centers of electric load as Chicago, Cleveland, Columbus, Dayton, Northern Indiana, St. Louis and Northern, Central and Tidewater Virginia. If the Commission approves the pending filings expeditiously as requested, Alliance Transco will be able to operate very soon across a large region that is comparable in size and scope to any of the potential RTOs being discussed today. Moreover, with Alliance Transco and the Midwest ISO poised for operation, transmission customers throughout the vast Alliance-Midwest ISO Super-Region will receive the benefits of a seamless market, including single (non-pancaked) transmission access charges, very soon. The earlier the Alliance RTO becomes operational, the sooner these benefits to the market will be realized. Broader inter-RTO cooperation is not only possible but very likely if Alliance Transco and other RTOs become operational. Accordingly, the Alliance Companies urge the Commission to approve the pending Business Plan and National Grid filings by October 24, 2001.

Respectfully submitted,



Becky M. Bruner
Vinson & Elkins, L.L.P.
1455 Pennsylvania Ave., N.W.
Washington, D.C. 20004-1008
(202) 639-6557

Attorney for the Alliance Companies

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Alliance Companies)	
Ameren Corporation on behalf of:)	Docket No. RT01-88-000
Union Electric Company)	
Central Illinois Public Service Company)	
American Electric Power Service Corporation)	
on behalf of:)	
Appalachian Power Company)	
Columbus Southern Power Company)	
Indiana Michigan Power Company)	
Kentucky Power Company)	
Kingsport Power Company)	
Ohio Power Company)	
Wheeling Power Company)	
Consumers Energy)	
and Michigan Electric Transmission Company)	
Exelon Corporation on behalf of:)	
Commonwealth Edison Company)	
Commonwealth Edison Company of Indiana, Inc.)	
FirstEnergy Corp. on behalf of:)	
American Transmission Systems, Inc.)	
The Cleveland Electric Illuminating Company)	
Ohio Edison Company)	
Pennsylvania Power Company)	
The Toledo Edison Company)	
Illinois Power Company)	
Northern Indiana Public Service Company)	
Virginia Electric and Power Company)	

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ALLIANCE COMPANIES' OFFER OF SETTLEMENT

Pursuant to Rule 602 of the Commission's Rules of Practice and Procedure, 18 C.F.R. §§ 385.602 (2001), the Alliance Companies¹ submit this Offer of Settlement ("Offer") in the above-referenced proceedings. The Offer represents the culmination of discussions held on August 14, August 21, September 11, and September 25, 2001, between the Alliance Companies and various other parties concerning formation of the Stakeholder Advisory Committee ("Advisory Committee") for the Alliance RTO². These discussions have taken place under the auspices of Richard L. Miles, Director of the Commission's Office of Dispute Resolution Services ("DRS").

I. Background

In an Order issued on July 12, 2001, the Commission noted the Alliance Companies had made significant progress as evidenced by information on its website, but the Commission still expressed concerns over the formation of a stakeholder Advisory Committee. The Commission invited the parties to use the services of the DRS to resolve issues related to formation of the Advisory Committee and directed the Alliance Companies to incorporate changes consistent with such resolution into its proposal for the Alliance RTO.³ On July 20, 2001, the Alliance Companies announced a self-designation procedure by which all interested persons could

¹ The Alliance Companies are Ameren Services Company (on behalf of Union Electric Company and Central Illinois Public Service Company), American Electric Power Service Corporation (on behalf of Appalachian Power Company, Columbus Southern Power Company, Indiana Michigan Power Company, Kentucky Power Company, Kingsport Power Company, Ohio Power Company, and Wheeling Power Company), Consumers Energy Company and Michigan Electric Transmission Company, The Dayton Power and Light Company, Exelon Corporation (on behalf of Commonwealth Edison Company and Commonwealth Edison Company of Indiana, Inc.), FirstEnergy Corp. (on behalf of American Transmission Systems, Inc., The Cleveland Electric Illuminating Company, Ohio Edison Company, Pennsylvania Power Company, and The Toledo Edison Company), Illinois Power Company, Northern Indiana Public Service Company, and Virginia Electric and Power Company.

² The Alliance Companies made the logistical arrangements and paid the expenses for these meetings. The DRS compiled a list of persons attending the meetings. A number of State Commissions were represented, as well as a broadly representative group of Stakeholders. Each of the meetings was attended by approximately 50 persons and there were others participating by telephone.

³ *Alliance Companies, et al.*, 96 FERC ¶ 61,052, at 61,146 (2001).

participate to establish the Alliance Advisory Committee. Ninety (90) persons submitted forms to participate in the formation of the Alliance Advisory Committee. Participants in the procedure were to have identified their chosen representatives and alternate representatives by August 23, 2001 so that the Alliance Advisory Committee could be formed. However, as stated in a notice posted on the Alliance RTO website, the Alliance Companies, at the request of certain stakeholders, agreed to postpone the date for naming advisory group representatives to the Alliance Advisory Committee.

II. Explanatory Statement

By agreement of the parties, the discussions with the DRS are confidential; however, the Alliance Companies' Offer is intended to represent the substantive culmination of those discussions. The terms of the Offer are contained in Attachment A which is entitled Principles For Agreement For The Formation Of The Stakeholder Advisory Committee ("Principles"). The Principles were negotiated with State Commissions and other stakeholders. The negotiations concluded during a telephone conference held on October 10, 2001 in which the DRS participated. Based on the DRS discussions, the Alliance Companies expect that the State Commissions and most other parties that participated will support the Offer.

The Principles relate to formation of the Advisory Committee and the scope of its activities. The Advisory Committee is to be formed immediately and it will provide advice to, and receive information from, the Commission-approved governing body of the Alliance RTO/Alliance Transco⁴ on Alliance RTO matters of interest to the stakeholders, including any

⁴ The Commission-approved governing body of the Alliance RTO/Alliance Transco refers to the Alliance Transmission Company LLC proposed as the Alliance RTO in Docket No. RT01-88-000, or a preceding interim independent authority authorized by the Commission, hereinafter referred to as "Alliance RTO." As noted in the Principles, the use of this terminology does not imply that any party to the Principles has waived any right to object to the manner by which the Alliance Companies have proposed to form the Alliance RTO, nor does it imply that the Alliance Companies have agreed to any change in that proposal.

preceding interim independent governing authority authorized by the Commission. The Alliance Companies have proposed to form the Alliance RTO as Alliance Transmission Company LLC ("Alliance Transco") which will be governed by an independent managing member. The Alliance Companies have proposed that National Grid become the managing member of Alliance Transco, subject to a Commission finding that it is a non-market participant with respect to the Alliance region. The Alliance Companies also have proposed that National Grid assume the role of independent decision-maker for the remainder of the start-up phase of Alliance Transco once National Grid's independence is established.⁵

For purposes of the Alliance Transco LLC Agreement, the Principles will govern the formation, structure and composition of the Advisory Committee originally contemplated in Section 6.6(a) of the *pro forma* Alliance Transco LLC Agreement filed in these proceedings on September 15, 2001. Other advisory committees contemplated under the *pro forma* Alliance Transco LLC Agreement, e.g., the Non-divesting Transmission Owners' Advisory Committee, are outside the intended scope of the Principles. The final Alliance Transco LLC Agreement filed with the Commission will include provisions for the Advisory Committee based on the Principles included in the Offer.

The Advisory Committee initially will consist of Stakeholder Groups, with proportional voting as follows: (i) transmission owners (14.3%), (ii) municipal and cooperative electric utilities and transmission-dependent utilities (14.3%), (iii) independent power producers, wholesale generators and other generation-owning transmission-dependent utilities (14.3%), (iv) power marketers and brokers (14.3%), (v) eligible end-use customers (14.3%), (vi) state regulatory authorities (14.3%), (vii) public consumer groups, and (viii) environmental groups

⁵ See Alliance Business Plan filed in Docket No. RT01-88-000 on August 27, 2001.

(7.1%). The Alliance RTO will have the right to add other Stakeholder Groups as industry conditions change, subject to approval of the Advisory Committee.

Any interested party may select one Stakeholder Group in which it will participate as a voting member; however, nothing precludes an interested party or its affiliates from participating, on a non-voting basis, in more than one Stakeholder Group, provided the party or its affiliate meets the membership/participation requirements. Each Stakeholder Group will define its own eligibility requirements on a non-discriminatory basis and will publicize procedures for establishing membership and/or participation in its group. The full Advisory Committee may review appeals brought by a party that been rejected for membership or participation. A member that qualifies for more than one Stakeholder Group may change the group in which it votes once annually.

The Advisory Committee will establish a reasonable dues structure except that no dues will be assessed against residential consumer advocates, environmental groups, or state regulatory authorities. The Alliance RTO will provide reasonable support to enable the Advisory Committee to function efficiently consistent with the support provided by other RTOs to their Advisory Committees. Advisory Committee dues may offset a portion of related expenses.

The Advisory Committee will determine its own rules for selecting officers and conducting work. The Chairperson of the Advisory Committee, or his or her designee, will communicate the advice and concerns of the Advisory Committee to the Alliance RTO.

The Advisory Committee will interact with the Alliance RTO through its senior management and board of directors ("board"), as well as staff, when appropriate. The Alliance RTO will aspire to achieve free and open exchange of information with the Advisory Committee. The Alliance RTO will meet with the Advisory Committee on a monthly basis, or as otherwise

agreed. Advance notice of such meetings will be provided. In addition, the Advisory Committee and its members will be given an opportunity to appear at Alliance RTO board meetings, and the Advisory Committee may comment on board decisions and present its advice, including minority opinions, to the board. All members of the Advisory Committee will receive advance notice of board meetings and agendas.


Notice and agendas for all regularly-scheduled Advisory Committee meetings will be provided to all members at least one week in advance. The Advisory Committee will have the ability to schedule ad hoc meetings/telephone conferences and may conduct joint meetings with external RTO advisory committees. A senior representative (officer, trustee or director) of the Alliance RTO will participate in all regularly-scheduled meetings and, to the extent possible, all ad hoc meetings, or conference calls, at the invitation of the Advisory Committee.

III. Conclusion

The Alliance Companies are grateful to the Commission for its guidance and to the Director of DRS for his assistance in the development of the Principles included in this Offer. The Alliance Companies believe that the Offer reflects the consensus of the parties participating in those DRS discussions concerning formation of the Alliance Advisory Committee. If accepted, the Offer will resolve the issues surrounding formation, structure and composition of the Advisory Committee, and it will provide an important forum for stakeholder input and advice prior to formation of the Alliance RTO and thereafter. The Alliance Companies will incorporate

the Principles into the final Alliance Transco LLC Agreement. The Offer is reasonable and in the public interest, and the Alliance Companies urge the Commission to approve it.

Respectfully submitted,


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(202) 639-6557

Patrick J. McCormick III
Balch & Bingham LLP
1275 Pennsylvania Ave., N.W.
Washington, D.C. 20004-2404

Attorneys for the Alliance Companies

October 12, 2001

ATTACHMENT A

**PRINCIPLES OF AGREEMENT
FOR THE
FORMATION OF THE STAKEHOLDER ADVISORY COMMITTEE**

- A. The Stakeholder Advisory Committee ("Advisory Committee") shall be formed and shall operate in accordance with principles described herein.
- B. The Advisory Committee shall be formed immediately.
- C. (1) The scope of activities of the Advisory Committee will be to provide advice to, and receive information from the FERC-approved governing body of the Alliance RTO/Alliance Transco¹ on Alliance RTO-related matters of interest to the stakeholders. The Advisory Committee will interact with the Alliance RTO through its senior management and board of directors, as well as with staff, when appropriate. A stated goal of the Alliance RTO, with respect to the Advisory Committee, shall be to achieve free and open exchange of information with interested parties.
- (1.a) Notice and agendas for all regularly-scheduled Advisory Committee meetings shall be provided to all Advisory Committee members at least one week prior to the meeting. Notice and agendas for all ad hoc Advisory Committee meetings shall be provided to all Advisory Committee members at least one day prior to the ad hoc meeting.
- (2) The Advisory Committee, in its sole discretion, reserves the right to convene joint meetings with external RTO Advisory Committees or stakeholders and take such other actions as may be useful or necessary for the purpose of achieving a single market with common procedures, protocols, and communications in furtherance of the seamless market objectives described in the settlement agreement approved by the FERC in Docket No. ER01-123-000, *et al* or for other proper RTO objectives.
- D. (1) A senior representative, who shall be an officer, trustee, or director of the Alliance RTO shall attend regularly-scheduled meetings of the Advisory Committee.

¹ The FERC-approved governing body of the Alliance RTO/Alliance Transco refers to the Alliance Transmission Company LLC proposed as the Alliance RTO in Docket No. RT01-88-000, or a preceding interim independent governing authority authorized by FERC, hereinafter, for purposes of this document, referred to as "Alliance RTO." The use of this terminology does not imply that any party to these Principles has waived any right to object to the manner by which the Alliance Companies have proposed to form the Alliance RTO, nor does it imply that the Alliance Companies have agreed to any change in that proposal.

(2) In addition, in its sole discretion, the Advisory Committee shall have the ability to schedule ad hoc meetings/calls, if necessary, to deal with unanticipated problems. The Alliance RTO shall respond favorably to an invitation from the Advisory Committee to participate in any such ad hoc meetings/calls. To the extent possible, a senior representative shall be made available. The minutes of the Advisory Committee meetings, subject to amendment by the Advisory Committee, shall be available to all stakeholders.

- E. In order for the Advisory Committee to fulfill its advisory function, the Alliance RTO will meet on a monthly basis, or as otherwise agreed, with the Advisory Committee. Notice will be provided in advance of each meeting, and other communications will be circulated to Advisory Committee Members as deemed appropriate by the Advisory Committee or the Alliance RTO consistent with the spirit of open and regular communication. The Chairperson of the Advisory Committee, or his or her designee, shall communicate to the Alliance RTO the advice and concerns of the Advisory Committee. At each Board meeting of the Alliance RTO there shall also be time reserved as an opportunity for any member of the Advisory Committee to appear and for the Advisory Committee to comment on decisions and present its advice, including minority opinions, if any. The agenda for each Board meeting of the Alliance RTO shall be distributed ahead of time to all Advisory Committee members so as to allow sufficient time for an Advisory Committee Meeting to be called to formulate Advisory Committee positions on Board agenda items.
- F. (1) The Advisory Committee initially shall consist of the following Stakeholder Groups ("Stakeholder Groups") and their respective percentage of the total votes within the Advisory Committee: (i) transmission owners (14.3%); (ii) municipal and cooperative electric utilities and transmission-dependent utilities (14.3%); (iii) independent power producers, wholesale generators, and other generation-owning transmission-dependent utilities (14.3%); (iv) power marketers and brokers (14.3%); (v) eligible end-use customers (14.3%); (vi) state regulatory authorities (14.3%); (vii) public consumer groups (7.1%); and (viii) environmental groups (7.1%). The Alliance RTO, shall have the right to add other Stakeholder Groups as industry conditions change, subject to the approval of the Advisory Committee.
- (2) An interested party shall select one Stakeholder Group in which it will participate as a voting member. Each Stakeholder Group will define eligibility for membership within its group on a non-

discriminatory basis and publicize the procedures for establishing membership in its Stakeholder Group. An interested party that has been rejected for participation in a Stakeholder Group may appeal that decision to the full Advisory Committee.

(2.a) "Advisory Committee Member" shall be defined as any full-voting rights member of a Stakeholder Group that is in good standing with all requirements for membership established by the relevant Stakeholder Group and the Advisory Committee.

(3) An Advisory Committee Member and its Affiliates may vote in only one Stakeholder Group, provided that, nothing herein prevents such Advisory Committee Member, or any of its Affiliates from participating, with no voting rights, in any other Stakeholder Group for which it qualifies. Qualification for such non-voting participation shall be determined on a non-discriminatory basis by each Stakeholder Group with rights of appeal to the entire Advisory Committee.

- G. The rules for voting within each Stakeholder Group and how such votes shall be reported to the Advisory Committee shall be decided within each Stakeholder Group.
- H. An Advisory Committee member may change the Stakeholder Group in which it votes once annually if it qualified for more than one Stakeholder Group. If, due to a material change in business operations, an Advisory Committee member no longer qualifies for the Stakeholder Group to which it belongs, it may change its membership to a Stakeholder Group for which it qualifies, at any time.
- I. The Advisory Committee will establish a reasonable dues structure except that no dues will be assessed against residential consumer advocates, environmental groups, or state regulatory authorities.
- J. The Alliance RTO will provide reasonable support to enable the Advisory Committee to function efficiently consistent with the support provided by other RTOs to their Advisory Committees. Dues for membership in the Advisory Committee may be used to offset a portion of related expenses
- K. The process for selecting Advisory Committee officers and the establishing the procedures for conducting the work of the Advisory Committee shall be decided by the Advisory Committee members.

ATTACHMENT B

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Alliance Companies)	
Ameren Corporation on behalf of:)	Docket No. RT01-88-000
Union Electric Company)	
Central Illinois Public Service Company)	
American Electric Power Service Corporation)	
on behalf of:)	
Appalachian Power Company)	
Columbus Southern Power Company)	
Indiana Michigan Power Company)	
Kentucky Power Company)	
Kingsport Power Company)	
Ohio Power Company)	
Wheeling Power Company)	
Consumers Energy)	
and Michigan Electric Transmission Company)	
Exelon Corporation on behalf of:)	
Commonwealth Edison Company)	
Commonwealth Edison Company of Indiana, Inc.)	
FirstEnergy Corp. on behalf of:)	
American Transmission Systems, Inc.)	
The Cleveland Electric Illuminating Company)	
Ohio Edison Company)	
Pennsylvania Power Company)	
The Toledo Edison Company)	
Illinois Power Company)	
Northern Indiana Public Service Company)	
Virginia Electric and Power Company)	

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NOTICE OF FILING

Take notice that on October 12, 2001, the Alliance Companies, et al. tendered for filing with the Federal Energy Regulatory Commission (Commission) an Offer of Settlement in the above-captioned proceedings pursuant to Rule 602, 18 CFR § 385.602 (2001), of the Commission's Rules of Practice and Procedure. The Offer of Settlement addresses principles for the formation of the Alliance Advisory Committee reflecting what the Alliance Companies believe is a consensus with stakeholders participating in discussions under the guidance of the Commission's Dispute Resolution Services.

Pursuant to Rule 602(f) of the Commission's Rules of Practice and Procedure, comments on the Offer of Settlement are due within twenty days of the filing, or November 1, 2001 and reply comments may be filed within thirty days of the filing or November 12, 2000. Copies of this filing are on file with the Commission and are available for public inspection. This filing may also be viewed on the web at <http://www.ferc.gov> using the "RIMS" link, select "Docket#" and follow the instructions (call 202-208-2222 for assistance). Comments, protests and interventions may be filed electronically via the Internet in lieu of paper. See, 18 CFR § 385.2001(a)(1)(iii) and the instructions on the Commission's web site under the "e-Filing" link.

David P. Boergers
Secretary

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was sent by overnight mail via Federal Express to the following parties of record on this 17th day of October, 2001:

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

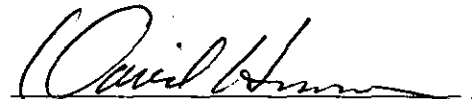
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