

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

In the Matter of the Application of Union Electric)
Company for Authority to Continue the)
Transfer of Functional Control of Its Transmission) Case No. EO-2011-0128
System to the Midwest Independent Transmission)
System Operator, Inc.)

**APPLICATION OF
MIDWEST INDEPENDENT TRANSMISSION
SYSTEM OPERATOR, INC. TO INTERVENE**

The Midwest Independent Transmission System Operator, Inc. (“Midwest ISO”), by and through its counsel and pursuant to 4 CSR 240-2.075, applies to intervene in the above-referenced case. In support of this Application, Midwest ISO states:

1. Midwest ISO is a not-for-profit corporation organized and existing under and by virtue of the laws of Delaware, with its principal place of business at 720 City Center Drive, Carmel, Indiana, 46032.

2. Midwest ISO is a regional transmission organization (RTO) that monitors and controls the bulk electric system, for its transmission owner members and system users, and provides all customers with open access transmission service. The Federal Energy Regulatory Commission approved the Midwest ISO as the nation’s first RTO on December 20, 2001. On February 1, 2002, the Midwest ISO began providing regional transmission service for the movement of bulk power over the transmission facilities within its footprint. Midwest ISO has operated real-time and day-ahead energy markets since April 1, 2005, and an ancillary services market since January 6, 2009.

3. Communications in this matter should be addressed to:

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4. As a functioning RTO, Midwest ISO is the sole provider of transmission service for those entities such as Union Electric Company, d/b/a/ Ameren Missouri that have transferred functional control of their transmission assets to Midwest ISO. As the transmission provider, Midwest ISO has a responsibility for the planning and operation of the regional transmission grid. The manner in which electricity is delivered to customers is a complex system. The construction and operation of generation facilities, and the management of demand response and energy efficiency mechanisms influence both the design and operation of the transmission system. Likewise, the operation of generation and demand response resources affect the functioning of the Midwest ISO's energy markets. Thus, Midwest ISO has an interest in how these interrelated issues affect its Missouri members and Missouri stakeholders, which may, in turn, affect the Midwest ISO's planning and operation of the regional transmission system and its energy markets. As a result, Midwest ISO is vitally interested in Ameren Missouri's November 1, 2010 Verified Application to extend its authority to continue the transfer of functional control

of its electric transmission system to Midwest ISO through December 31, 2013. These interests are, therefore, different from those of the general public.

5. Midwest ISO, as a signatory to the 2008 Stipulation in Case No. EO-2008-0134, was part of the stakeholder group that had discussions leading up to Ameren Missouri's filing of its Verified Application to extend its participation in Midwest ISO. The Verified Application reviews and notes the improved benefits that the updated Ameren Missouri analysis showed, which is presented as a basis for the extension. Although the Midwest ISO fully supports the requested extension, and concurs in the increased benefits realized by Ameren through continued participation, the Midwest ISO takes no position on the Application's noted factors and reasons for the need to re-examine Ameren Missouri's continued participation in Midwest ISO beyond 2013.

6. In addition, Midwest ISO submits that its Application to Intervene in this case meets the requirements of the good cause standard because Midwest ISO will be able to provide the Commission its perspective on day-to-day operations of the regional transmission grid under its control.

WHEREFORE, Midwest ISO respectfully requests permission to intervene in the above referenced case.

Respectfully submitted,

/s/ Karl Zobrist
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Certificate of Service

I hereby certify that a true and correct copy of the foregoing was e-mailed on this 9th day of November, 2010, to the persons on the Commission's service list in this case.

/s/ Karl Zobrist _____
Attorney for Midwest Independent Transmission
System Operator, Inc.