

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

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| In The Matter of the Application of Aquila, |) | |
| Inc., d/b/a Aquila Networks – MPS and |) | |
| Aquila Networks – L&P for Authority to |) | |
| Transfer Operational Control of Certain |) | Case No. EO-2008-0046 |
| Transmission Assets to the Midwest |) | |
| Independent Transmission System |) | |
| Operator, Inc. |) | |

UNION ELECTRIC COMPANY d/b/a AMERENUE’S STATEMENT OF POSITION

COMES NOW Union Electric Company d/b/a AmerenUE (“Company” or “AmerenUE”) and, in compliance with the Commission’s Second Order Modifying Procedural Schedule, hereby files its Statement of Position with respect to the issues identified in the List of Issues, and Order of Opening Statements, Witnesses and Cross-Examination filed by the Staff on March 7, 2008.

1. Is “not detrimental to the public interest” the appropriate standard for the Commission to use in making its determinations in this case?

Yes.

2. Should the Commission determine that Aquila’s application to join MISO is not detrimental to the public interest? What considerations should the Commission take into account in making its determination?

AmerenUE takes no position on this issue at this time, subject to AmerenUE’s further consideration of this issue based upon the development of the record in this proceeding.

3. If the Commission approves Aquila’s application to join MISO, should the Commission make its approval subject to certain conditions? If so, what are the conditions?

AmerenUE takes no position on this issue at this time, subject to AmerenUE’s further consideration of this issue based upon the development of the record in this proceeding.

4. In making its determination whether to grant Aquila's application to join MISO, should the Commission compare Aquila's membership in MISO to other alternatives? If so, what are the alternatives and what do the comparisons of the alternatives show?

AmerenUE takes no position on this issue at this time, subject to AmerenUE's further consideration of this issue based upon the development of the record in this proceeding.

5. To what extent should the Commission take into account the following in its determination of whether or not to approve Aquila's application to join MISO?

- a. The CRA International, Inc. cost-benefit study sponsored by Aquila;
- b. Cost-benefit analyses sponsored by parties other than Aquila
- c. Costs and/or benefits not included in the CRA International cost-benefit study sponsored by Aquila or cost-benefit analyses sponsored by parties other than Aquila;
- d. Aquila's current relationships with MISO and SPP;
- e. Differences in the development of electricity markets between MISO and SPP;
- f. The proposed acquisition of Aquila by Great Plains Energy that is the subject of Case No. EM-2007-0374;
- g. Union Electric Company's continuing membership in MISO;
- h. Aquila's obligation to MISO made in FERC Docket No. ER02-871 to file and support Aquila's application to join MISO;

AmerenUE takes no position on this issue at this time, subject to AmerenUE's further consideration of this issue based upon the development of the record in this proceeding.

6. If the Commission authorizes Aquila to join MISO, should the Commission determine now whether all future FERC-approved administrative fees Aquila is assessed by MISO and all future costs Aquila incurs from MISO in making prudent purchases of capacity and/or energy to serve its bundled retail load should be considered to be prudently incurred expenses for purposes of including them in Aquila's cost of service in Aquila's next general electric rate case before this Commission?

Yes.

WHEREFORE, AmerenUE respectfully submits its Statement of Position.

Respectfully submitted,

SMITH LEWIS, LLP

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Dated: March 18, 2008

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail on counsel for all parties appearing on the Commission's Service List in Docket No. Eo-2008-0046, on this 18th day of March, 2008.

/s/James B. Lowery
James B. Lowery