

GENERAL RESPONSE TO STAFF'S REQUEST FOR COMMENT – File No. EW-2010-0187

MPSC Staff has asked for comments following the April 11, 2011 workshop. Ameren Missouri submits these brief comments to outline its thoughts on a Staff draft of a possible rule relating to ARCs. Ameren Missouri will continue to stay involved in these workshops and any rulemaking that may at some point follow and will, as appropriate, provide additional comments at that time.

As Ameren Missouri conveyed during the workshop, there is too much uncertainty at the current time surrounding the subject matter of Staff's draft of a possible rule and further discussion or movement on these issues should wait until an expected July, 2011 filing by the MISO is made at the FERC. The uncertainty is also combined with not having a legal opinion from Staff on whether ARC's may operate in Missouri. Consequently, the Company believes it would be more productive to wait until after the MISO filing on July 22 to have further discussions. One approach that Ameren Missouri feels would be productive would be for the utilities and the ARC's to engage in discussion about possible alternative programs. The Company believes this would make future ARC/MISO (or other RTO) discussions with Staff and the workshop participants more productive.