

August 7, 2001

**FILED<sup>3</sup>**

**AUG 07 2001**

**VIA HAND DELIVERY**



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 the **Proposed Procedural Schedule**.

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,

*James J. Cook / sh*

James J. Cook  
Managing Associate General Counsel

JJC/mlh  
Enclosures

FILED<sup>3</sup>

AUG 07 2001

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

Missouri Public  
Service Commission

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 )

**PROPOSED PROCEDURAL SCHEDULE**

COMES NOW Union Electric Company, d/b/a AmerenUE ("AmerenUE" or "Company"), and pursuant to 4 CSR 240-2.080 hereby respectfully submits a proposed procedural schedule for Case No. EO-2001-684. In support thereof the Company states the following:

1. On June 8, 2001, the Company filed its Application with the Commission for an Order Authorizing it to Withdraw from the Midwest Independent System Operator, Inc. (Midwest ISO") in order to participate in the Alliance Regional Transmission Organization ("ARTO"). This filing was made shortly after the Federal Energy Regulatory Commission ("FERC") issued its Order accepting the Settlement Agreement in ER01-123. That Settlement Agreement, as approved by the FERC, provided for the elimination of pancaking of rates between the Alliance and the Midwest ISO, provided the basis for a seamless market through the two organizations, established a process for stakeholder involvement in the Alliance RTO, provided FERC approval for Ameren to withdraw from the Midwest ISO and constituted a complete and final resolution of all issues raised in the Union Electric Company withdrawal case pending at the FERC in Docket No. ER01-966-000. Once the FERC had approved that Settlement Agreement,

the Company was able to make the instant filing with the assurance that the record in this case would not be disrupted by later FERC orders.

2. On July 18, 2001, the Staff of the Commission ("Staff") filed a request for a prehearing conference to discuss, define and possibly resolve issues presented in this case, and to discuss a procedural schedule.

3. On July 31, 2001 the prehearing conference was held. At the time of the prehearing, it did not appear that the Staff, Office of Public Counsel and the Company would be able to agree on a proposed procedural schedule. However, as of the date of this filing, it appears that the Staff's proposed schedule is, in fact, acceptable to the Company. The Company's understanding of that proposal is as follows:

<b>Date</b>	<b>Event</b>
8/17/01	Company Direct Testimony Filed
9/12/01	Staff, Office of Public Counsel and Intervenors File Rebuttal Testimony
9/24/01	Company Files Surrebuttal Testimony
10/10 – 12 /01	Evidentiary Hearings
10/26/01	Briefs Filed
11/7/01	Reply Briefs Filed
12/5/01	Commission Order Issued

4. It is recognized that this schedule provides less time than would normally be preferred for various steps in this process. As indicated in the Company's Application, the FERC approved date for the Alliance RTO to become operational is

December 15, 2001. Failure to approve AmerenUE's withdrawal from the Midwest ISO by the date requested would significantly undermine, and effectively destroy, the FERC Settlement Agreement, and would send the formation of the ARTO and Midwest ISO into a tailspin. At the very least, it would significantly delay the implementation date well beyond the December 15, 2001 date ordered by the FERC, and perhaps send all of the parties to that Settlement Agreement back to the drawing board.

### CONCLUSION

The procedural schedule proposed above provides adequate time to protect the procedural rights of all concerned. The Company respectfully requests that the Commission approve that schedule.

Dated August 7, 2001

Respectfully submitted,

UNION ELECTRIC COMPANY  
d/b/a AmerenUE

By: James J. Cook / sh

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served on the following parties of record via U.S. First-Class Mail on this 7<sup>th</sup> day of August, 2001:

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