



Martha S. Hogerty
Public Counsel

State of Missouri

Bob Holden
Governor

Office of the Public Counsel
Governor Office Building
Suite - 650, Box 7800
Jefferson City, Missouri 65102

Telephone: 573-751-4857
Facsimile: 573-751-5562
Relay Missouri
1-800-735-2966 TDD
1-800-735-2466 Voice

August 9, 2001

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED²
AUG 9 2001
Missouri Public
Service Commission

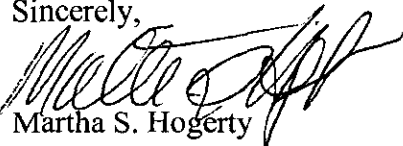
**RE: Union Electric Company d/b/a AmerenUE,
Case No. EO-2001-684**

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case are the original and 8 copies of **Office of the Public Counsel's Response to Staff Proposed Procedural Schedule**. Please "file" stamp the extra enclosed copy and return it to this office for our files. I have also on this date mailed, faxed, and/or hand-delivered copies to all counsel of record.

Thank you for your attention to this matter.

Sincerely,


Martha S. Hogerty
Public Counsel

MSH:kh

cc: Counsel of Record

Enclosure

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

FILED²

AUG 9 2001

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 Midwest ISO to participate in the)
Alliance RTO.)

Case No. EO-2001-684

**OFFICE OF THE PUBLIC COUNSEL'S
RESPONSE TO STAFF'S PROPOSED PROCEDURAL SCHEDULE**

COMES NOW the Office of the Public Counsel (Public Counsel) and for its Response to Staff's Proposed Procedural Schedule states as follows:

1. A very aggressive implementation schedule is necessary to allow the Alliance RTO to become operational by December 15, 2001. In addition, a considerable list of items exists where the FERC has either rejected or deferred a finding that the Alliance is in compliance with FERC's RTO policies and procedures.


2. Public Counsel has no objection to Staff's procedural schedule because it accommodates the proposed December 15th operational date. However Public Counsel believes the December operational date is optimistic.

3. Because of the uncertainties referenced above, Public Counsel may later request the Commission to suspend or modify the procedural schedule or request that the Commission only grant temporary or conditional authority prior to December 15, 2001.

WHEREFORE Public Counsel requests the Commission to adopt Staff's proposed procedural schedule being mindful of the uncertainties associated with this application.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

BY: 
Martha S. Hogerty (Bar No. 30052)
Public Counsel
200 Madison, Suite 650
P. O. Box 7800
Jefferson City, MO 65102-7800
Telephone: (573) 751-4857
Facsimile: (573) 751-5562

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been faxed, mailed, or hand-delivered to the following counsel of record on this 9th day of August, 2001:

Steven Dottheim
Chief Deputy General Counsel
Missouri Public Service Commission
P. O. Box 360
Jefferson City MO 65102

David B. Hennen
Ameren Services Company
1901 Chouteau Avenue
P. O. Box 66149 (MC 1310)
St. Louis MO 63166-6149

Diana M. Vuylsteke
Bryan Cave LLP
One Metropolitan Square
211 North Broadway, Suite 3600
St. Louis MO 63102

Duncan E. Kincheloe
2407 West Ash Street
Columbia MO 65203

Lisa C. Langeneckert
720 Olive Street, 24th Floor
St. Louis MO 63101

Robin E. Fulton
Schnapp, Fulton, Fall, McNamara & Silvey
135 E. Main Street, P. O. Box 151
Fredericktown MO 63645-0151

