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September 27, 2001

FILED²
SEP 28 2001
Missouri Public
Service Commission

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Re: Application of Union Electric Company to Withdraw from
Midwest ISO and Participate in Alliance RTO
Case No. EO-2001-684

Dear Mr. Roberts:

On behalf of the Missouri Energy Group, I enclose herewith for filing in the above matter, an original and eight (8) copies of its Position Statement. An additional copy of this document is enclosed, which I would appreciate your file stamping and returning in the enclosed, pre-addressed envelope.

Yours very truly,



Lisa C. Langeneckert

Enclosures (11)
cc/enc: All parties of record
VIA OVERNIGHT MAIL

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

FILED²
SEP 28 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

POSITION STATEMENT
OF MISSOURI ENERGY GROUP

COMES NOW, the Missouri Energy Group ("MEG") and for its Position Statement on the Issues states as follows:

1. Issue: Should UE's application for permission to withdraw from the Midwest ISO ("MISO") to join the Alliance RTO ("ARTO") be approved?

MEG Position: The application should not be approved at this time.

2. Issue: If the Commission decides to approve the Company's request to withdraw from the MISO and join the ARTO, which (if any) conditions should be required?

MEG Position: Before any transfer is approved, FERC should determine that the ARTO has met all of FERC's requirements that are applicable on the startup date of the ARTO. UE should agree to abide by the terms and conditions of the Commission-approved stipulation agreement in Case EO-98-413 as if the ARTO was the MISO. UE should return to the MISO if the ARTO does not meet FERC startup requirements by December 31, 2002. Additionally, no transfer should be allowed unless UE agrees to abide by the terms and conditions of the Stipulation and Agreement in Case No. EO-98-413, as if the ARTO was the MISO. Furthermore, the Commission should not permit UE to recover any portion of the payment it made to the MISO under the FERC-approved settlement in Case ER01-123-001 unless UE demonstrates comparable savings for its retail customers in Missouri was provided by switching from the MISO to the ARTO.

3. Issue: What is the appropriate standard for the Commission to use in deciding this case?

MEG Position: The appropriate standard is whether the transfer is in the public interest.

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4. Independent of the Stipulation and Agreement in Case No. EO-98-413, is the Commission's authorization necessary for UE to withdraw from the MISO and join the ARTO?

MEG Position: The Commission's authorization is required and necessary for UE to withdraw from the MISO.

5. Has the Commission conceded that UE's withdrawal from MISO is in the public interest by failing to object to such finding already made by FERC?

MEG Position: The Commission has not conceded that UE's withdrawal from MISO is in the public interest by failing to object to such finding already made by FERC.

6. Did UE violate the Stipulation and Agreement in EO-98-413 by failing to file with the Commission a notice of withdrawal at the same time the notice was filed at FERC on January 16, 2001?

MEG Position: The MEG takes no position on this issue.

7. The MEG reserves the right to cross examine any witness to this case.

Respectfully Submitted,



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Attorneys for Missouri Energy Group

CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Case No. EO-2001-684.

Dated at St. Louis, Missouri this 27th day of September, 2001:

Mr. John B. Coffman
Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102-7800

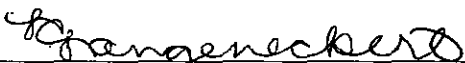
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