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October 1, 2001

PLEASE ADDRESS ALL
CORRESPONDENCE
TO FREDERICKTOWN

VIA UPS OVERNIGHT

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

FILED³

OCT 02 2001

**Missouri Public
Service Commission**

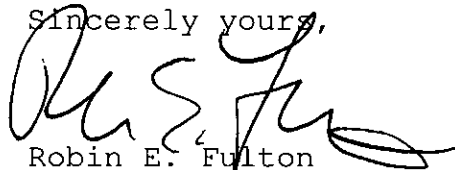
RE: Case No. EO-2001-684
Application of Union Electric Company
to Withdraw from Midwest ISO and
Participate in Alliance RTO

Dear Mr. Roberts:

On behalf of The Doe Run Resources Corporation, I enclose herewith
an original and eight (8) copies of its Position Statement.

Copies of same are this date being mailed to all parties of record
as shown on the Certificate of Service.

Sincerely yours,



Robin E. Fulton

REF:plw
Enclosures

cc: Parties of Record
w/encl.

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED³

OCT 02 2001

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

Missouri Public
Service Commission

POSITION STATEMENT OF
THE DOE RUN RESOURCES CORPORATION

Comes now The Doe Run Resources Corporation (hereinafter "Doe Run"), 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?

Doe Run 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?

Doe Run Position: Before any transfer is approved, FERC should determine that the ARTO has met all of FERC's requirement 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 No. 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 No. 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?

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

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?

Doe Run 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?

Doe Run 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?

Doe Run Position: Doe Run takes no position on this issue.

7. Doe Run reserves the right to cross-examine any witness in this case.

Respectfully submitted,

SCHNAPP, FULTON, FALL,
SILVEY & REID, L.L.C.

By: 

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Attorney for The Doe Run
Resources Corporation

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 1st day of October, 2001, caused a copy of the foregoing to be served by first class mail on all persons on the office service list in Case No. EO-2001-684:

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