

LAW OFFICE OF ROBERT C. JOHNSON

720 OLIVE STREET SUITE 2400 ST. LOUIS, MO 63101

FAX: (314) 588-0638

Robert C. Johnson
DIRECT: (314) 345-6436
E-MAIL: rjohnson@bspmlaw.com

Lisa C. Langeneckert
DIRECT: (314) 345-6441
E-MAIL: llangeneckert@bspmlaw.com

October 26, 2001

FILED²
OCT 29 2001
Missouri Public
Service Commission

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street
Jefferson City, MO 65102-0360

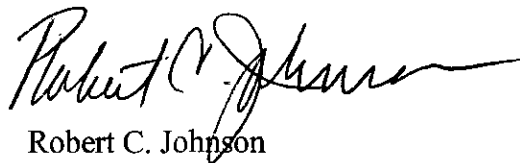
Re: MoPSC Case No.: EO-2001-684

Dear Mr. Roberts:

Enclosed for filing on behalf of the Missouri Energy Group ("MEG"), please find an original and eight (8) copies of MEG's Position Statement, which is being filed in lieu of a brief. We will appreciate your bringing this filing to the attention of the Commission.

Please acknowledge receipt of this filing by file-stamping the enclosed copy of this letter and returning it to me in the enclosed self-addressed envelope.

Yours very truly,



Robert C. Johnson

RCJ/gmw
Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

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

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Service Commission

POSITION STATEMENT OF THE MISSOURI ENERGY GROUP

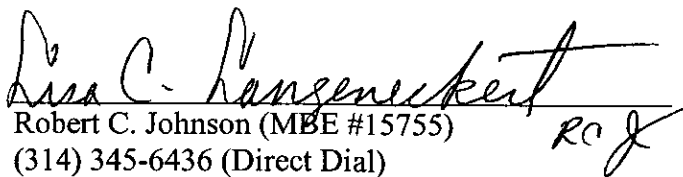
COMES NOW, the Missouri Energy Group ("MEG") and in lieu of a Brief files this
Position Statement as follows:

The MEG supports the position of the Staff of the Missouri Public Service Commission on the issues in this case. If the Public Service Commission ("Commission") determines that allowing Union Electric Company ("UE") to withdraw from the Midwest ISO ("MISO") and join the Alliance RTO ("ARTO") is in the public interest, it is the position of the MEG that such withdrawal should be conditioned without limitation on the following:

1. The Federal Energy Regulatory Commission ("FERC") shall determine that the ARTO has met all of FERC's requirements that are applicable on the startup date of the ARTO;
2. UE shall return to the MISO if the ARTO does not meet FERC startup requirements by December 31, 2002 or any later date approved by the Commission;
3. No transfer shall 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;

4. The MISO and ARTO shall function as a seamless, single RTO and there shall be no pancaking of rates; and
5. UE shall not be permitted 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.

Respectfully Submitted,


Robert C. Johnson (MBE #15755)
(314) 345-6436 (Direct Dial)
rjohnson@bspmlaw.com

Lisa C. Langeneckert (MBE #49781)
(314) 345-6441 (Direct Dial)
llangeneckert@bspmlaw.com
720 Olive Street, 24th Floor
St. Louis, MO 63101-2338
(314) 588-0638 (FAX)

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 26th day of October, 2001:

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

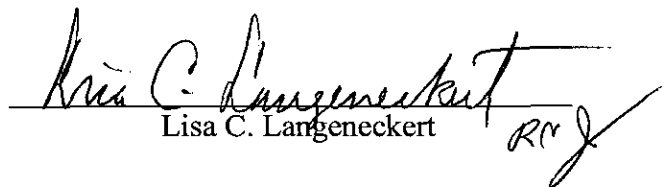
Mr. Dennis L. Frey
Associate General Counsel
Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

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

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

Mr. Duncan E. Kincheloe
Missouri Public Utility Alliance
2407 West Ash Street
Columbia, MO 65203

Ms. Diana Vuylsteke
Bryan Cave L.L.P.
One Metropolitan Square
211 North Broadway, Suite 3600
St. Louis, MO 63102-2750


Lisa C. Langeneckert