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September 24, 2001

FILED<sup>2</sup>
SEP 2 5 2001

## VIA HAND DELIVERY

Missouri Public Service Commission



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

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 Surrebuttal Testimony of David A. Whiteley on behalf of AmerenUE.

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,

David B. Hennen /sh

David B. Hennen Associate General Counsel

DBH:rd Enclosures

cc: Parties of Record

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served on the following parties of record via Federal Express on this 24<sup>th</sup> day of September, 2001:

General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102

Diana M. Vuylsteke Bryan Cave LLP Riverview Office Center 221 Bolivar Street, Suite 101 Jefferson City, MO 65101-1574

Duncan E. Kincheloe Missouri Public Utility Alliance 2407 W. Ash Columbia, MO 65203-0045

Lisa C. Langeneckert Law Office of Robert C. Johnson 720 Olive Street, Suite 2400 St. Louis, MO 63101

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

David B. Hennen

## BEFORE THE PUBLIC SERVICE COMMISSION OF THE 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	)	Case No. EO-2001-684
Midwest ISO to Participate in the Alliance RTO	)	

## AFFIDAVIT OF DAVID A. WHITELEY

STATE OF MISSOURI	)	
	)	SS
CITY OF ST. LOUIS	)	

David A. Whiteley, being first duly sworn on his oath, states:

- 1. My name is David A. Whiteley. I work in the City of St. Louis, Missouri and I am employed by Ameren Services Company as Senior Vice President.
- 2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of Union Electric Company d/b/a AmerenUE consisting of <u>20</u> pages, all of which have been prepared in written form for introduction into evidence in the above-referenced docket.

3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct.

David A. Whiteley

Subscribed and sworn to before me this <u>24</u> th day of September, 2001.

Notary Public

My Commission expires: 9-23-2002

CAROL A. HEAD
Notary Public - Notary Seal
STATE OF MISSOURI
St. Charles County

My Commission Expires: Sept. 23, 2002