BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of Union Electric Company for Authority To Continue the Transfer of Functional Control of Its Transmission System to the Midwest Independent Transmission System Operator, Inc.

File No. EO-2011-0128

FIRST PROGRESS REPORT

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or the "Company"), on behalf of itself and the others parties to this docket, and hereby submits this First Progress Report as contemplated by the Ordered Paragraph 3 of the Commission's December 22, 2014 Order Modifying 2012 Report and Order ("Modification Order"), as follows:

1. The Modification Order adopted the provisions of a joint motion filed by Ameren Missouri, the Commission's Staff, the Office of the Public Counsel and the Missouri Industrial Energy Consumers ("Joint Movants"), by which the Joint Movants had recommended, *inter alia*, that a new Ameren Missouri case respecting continued regional transmission organization participation or operation of its transmission system as an independent coordinator of transmission ("ICT") be delayed for a period of two years, to November 15, 2017. The Joint Motion was filed so that a more accurate comparison could be made of various options given changes taking place in the industry that were expected to become more clear between 2014 and 2017. Among those were material changes in the Southwest Power Pool's ("SPP") footprint, the

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start-up of SPP's energy markets, the integration of the Entergy Companies in MISO¹ and the finalization of the federal Clean Power Plan.

2. The Modification Order required that Ameren Missouri convene a stakeholder meeting to discuss any developments that may be pertinent to its continued MISO participation versus participation in another RTO^2 or as an ICT. Ameren Missouri convened that meeting on September 29, 2015, where any such developments were discussed. The consensus of the meeting was that the primary drivers of moving the filing of the next case to November 15, 2017 had not materially changed as compared to the parties' expectation about those drivers at the time the joint motion was filed.

3. Ameren Missouri reiterated that it plans to engage a third-party consultant to conduct a robust cost-benefit study and to develop the same using the process reflected in the Commission's April 19, 2012 *Report and Order* and December 22, 2014 Modification Order in this docket, including following the parameters (e.g., length of study period) specified in that *Report and Order* and Modification Order. The parties currently believe the modeling, with the appropriate updating of inputs to account for changes in the factors and data relevant to such an analysis, remains the appropriate modeling to determine whether Ameren Missouri's continued MISO participation after May 31, 2018 is in the public interest, and is similar to, and will be more detailed and robust than, the modeling used in File No. EO-2011-0128 in 2011-2012.³

¹ Midcontinent Independent System Operator, Inc.

² Regional Transmission Organization.

³ The modeling used at that time was an update performed by Ameren Missouri in 2011, of an initial, third-party modeling project performed by Charles Rivers Associates for use in File No. EO-2008-0134, which was resolved in 2008. As noted in the Commission's April 19, 2012 *Report and Order* and December 22, 2014 Modification Order in this docket, Ameren Missouri intends to commission an entirely new, third-party modeling study for use in its 2017 filing.

WHEREFORE, Ameren Missouri, on behalf of the parties, submits this First Progress

Report.

Dated: October 30, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail on counsel for the parties of record to this case, on this 30th day of October, 2015.

/s/James B. Lowery James B. Lowery