

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

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) Case No. EO-2008-0134
Midwest Independent Transmission System Operator,)
Inc.)

**STAFF RESPONSE TO MOTION TO
RESCHEDULE ON-THE-RECORD PRESENTATION**

Comes now the Staff of the Missouri Public Service Commission (Staff), by and through the Office of General Counsel of the Missouri Public Service Commission (Commission), and files the instant Staff Response to the AmerenUE Motion To Reschedule On-The-Record Presentation. In response the Staff states as follows:

1. On July 15, 2008, the Commission issued an Order Scheduling On-The-Record Presentation for July 29, 2008. On July 16, 2008 AmerenUE filed a Motion To Reschedule On-The-Record Presentation to August 5, 6, or 7, 2008. The Staff's subject matter expert, Michael S. Proctor, is not available on any of these substitute days suggested by AmerenUE. Undersigned counsel has so advised Counsel for AmerenUE. In fact, undersigned counsel and Counsel for AmerenUE have encountered difficulty finding a mutually convenient date in the near term for the parties for the On-The-Record Presentation.

2. The best and earliest feasible substitute date that has been identified within the next month is August 18, 2008. No other day prior to that week or during that week is possible and the signatory parties are not suggesting a date in a subsequent week. On August 18, 2008 Counsel and subject matter experts for signatories AmerenUE, Midwest Independent Transmission System Operator, Inc. (MISO), the Office of the Public Counsel (Public Counsel) and the Staff are available. Counsel for signatory Missouri Industrial Energy Consumers, Inc.

(MIEC) is available on August 18, 2008, but it is not certain whether the subject matter expert for MIEC, James R. Dauphinais, will be available. MIEC's Counsel has indicated that even if Mr. Dauphinais is not available, MIEC supports the August 18, 2008 On-The-Record Presentation date. Undersigned counsel notes that although the proposed date is not convenient for the Southwest Power Pool (SPP), SPP considers the On-The-Record Presentation to be very important and is making arrangements to be present. The Staff appreciates the accommodations being made by SPP.

2. Although the Stipulation And Agreement as filed was nonunanimous, the Commission may treat said Stipulation And Agreement as unanimous, pursuant to 4 CSR 240-2.115(2)(C), since no party has timely objected to it. In fact, SPP, Kansas City Power & Light Company (KCPL), Aquila, Inc. (Aquila) and The Empire District Electric Company (Empire) filed statements of non-objection / no opposition to the Stipulation and Agreement.

WHEREFORE, the Staff files the instant Staff Response to the AmerenUE Motion To Reschedule On-The-Record Presentation and requests that the Commission reschedule the On-The-Record Presentation to August 18, 2008.

Respectfully submitted,

/s/ Steven Dottheim

Steven Dottheim
Chief Deputy General Counsel
Missouri Bar No. 29149

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-7489 (Telephone)
(573) 751-9285 (Fax)
steve.dottheim@psc.mo.gov (e-mail)

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 22nd day of July 2008.

/s/ Steven Dottheim