

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI
DRAFT 8/28**

In the Matter of the Application of Union)
Electric Company for Authority to Continue)
The Transfer of Functional Control of Its) **File No. EO-2011-0128**
Transmission System to the Midwest)
Independent Transmission System Operator, Inc.)

STAFF’S MOTION FOR CLARIFICATION

COMES NOW, the Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and files *Staff’s Motion for Clarification* with the Missouri Public Service Commission (“Commission”) respectfully stating the following:

1. On August 23, 2011, the Commission filed its *Order Directing the Commission's Staff to Respond to Questions from the Commission in its Prefiled Testimony*.
2. As part of the *Order* the Commission requested in question number 5:
 5. *If MISO and Ameren Missouri state that there are no construction costs associated with integrating Entergy into MISO, what is the likelihood that they will be able to operate a single “consolidated system” as appears to be contemplated in the economic modeling? What is the Commission Staff’s opinion as to whether operating a “hypothetical” integrated system or two “stand alone” systems will produce the same benefits as the consolidated system that has been used in the economic models? If possible, please identify and quantify any differences.*
3. The Commission Staff is uncertain whether the single “consolidated system” and hypothetical “integrated system” referenced in the question refers to (1) solely a consolidated balancing authority; (2) a consolidated balancing authority and other elements; or (3) elements other than a consolidated balancing authority. Staff is currently interpreting the question as referring to (1) above, solely a consolidated balancing authority, but if the Commission can be specific as to which of the three above choices is correct, that would be helpful.

4. Also, as part of the *Order* the Commission requested in question number 6:

6. It has been estimated that it may cost as much as \$100 million to integrate Entergy into the MISO system, whose ratepayers will pay those costs? Will those costs be paid by Entergy's customers, all of MISO's customers or some combination?

5. The Staff is uncertain of an identified source for the \$100 million estimate provided in the question and assumes the \$100 million estimate provided in the question, includes all costs, such as administrative, construction, etc. The Staff is presently making inquiry regarding these costs, but if the Commission can be specific as to any source of an estimate of the \$100 million estimate of cost of integration of Entergy that would be helpful.

6. Also, as part of that *Order* the Commission requested in question number 13 that the Staff:

13. Contact the Wisconsin Public Service Commission and WPPI, Inc. and provide an opinion as to the veracity, truthfulness, and completeness of MISO's answer to question 12(b) on page 8 of their response dated June 16, 2011.

7. Question 12(b) was a question regarding MVP costs:

(b) Assuming the MVP costs can be passed through to ratepayers under a FERC tariff through Ameren's FAC tariff, as Construction Work in Progress (CWIP) or through some other mechanism, how much will the MVP projects cost Ameren Missouri's customers on an annualized basis and in total?

MISO's response to this question did not reference WPPI, Inc., nor the Wisconsin Public Service Commission.

8. In contrast, question 13 reads:

13. (a) Wisconsin Public Power, Inc. (WPPI) paid for transmission upgrades from a new coal plant and thought they would be receiving a corresponding amount of financial transmission rights to transmit baseload generation to their customers. Please describe what happened, whether WPPI received any financial transmission rights and what MISO did to fairly compensate WPPI? (b) How is MISO remedying these problems going forward in similar situations?

9. The references to WPPI in question 13, and the lack thereof in question 12 or MISO's response to question 12 indicates to Staff that perhaps the Commission's question number 13 should read as follows, "Contact the Wisconsin Public Service Commission and WPPI, Inc. and provide an opinion as to the veracity, truthfulness, and completeness of MISO's answer to question 13(b) on page 9 of their response dated June 16, 2011."

10. Staff assumes the Commission intended Staff to provide an opinion as to the veracity, truthfulness, and completeness of MISO's response to question 13(b) instead of question 12(b), but rather than make an incorrect assumption Staff wanted to be certain and, therefore, is requesting clarification.

WHEREFORE, the Commission Staff respectfully requests the Commission clarify questions 5, 6 and 13 as detailed above.

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 September 2, 2011.

/s/ Meghan E. McClowry