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.

Case No. EO-2011-0128

STATEMENT OF POSITION OF SOUTHWEST POWER POOL, INC.

Comes Now Southwest Power Pool, Inc. ("SPP"), by and through its attorneys, and for its Statement of Position states as follows:

1. On November 1, 2010, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri"), applied to the Missouri Public Service Commission ("Commission") for authority to continue the transfer of functional control of its electric transmission system to the Midwest Independent Transmission System Operator.

2. On November 14, 2011, Ameren Missouri filed, pursuant to the Commission's procedural order, the "Joint Issues and Witness List, Order of Opening Statements and Order of Cross-Examination" on behalf of all parties. The pleading identified seven issues to be addressed in the Statements of Position of each of the parties.

3. SPP asserts for its Statement of Position that, at this time, it has no position on any of the seven identified issues identified in the pleading. As a result, SPP will not be making an opening statement but reserves the right to file briefs, depending on the outcome of the hearing. SPP appreciates the opportunity to be a party to this docket and offers to provide any information that can help the Commission with its deliberations. Wherefore, SPP respectfully requests that the Commission accept this as SPP's Statement of Position.

Respectfully Submitted

/s/ David C. Linton

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Attorneys for Southwest Power Pool, Inc.

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was e-mailed on this 17th day of November, 2011, to the persons on the Commission's service list in this case.

<u>/s/ David C. Linton</u> Attorney for Southwest Power Pool, Inc.