

**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	)	Case No. EO-2011-0128
Functional Control of Its Transmission	)	
System to the Midwest Independent	)	
Transmission System Operator, Inc.	)	

**RESPONSE OF SOUTHWEST POWER POOL, INC. TO ORDER DIRECTING  
PARTIES TO ANSWER CERTAIN QUESTIONS**

COMES NOW Southwest Power Pool, Inc. (“SPP”), by and through its counsel, and for its response to the Missouri Public Service Commission’s (“Commission”) June 1, 2011 Order Directing the Parties to Answer Certain Questions, states as follows:

1. On November 1, 2010, Union Electric Company (“UE”) filed a verified application to extend permission and authority for participation in the Midwest ISO (“MISO”) as a regional transmission organization.
2. On November 21, 2010, SPP filed an application to intervene in the case, which intervention was granted by an order of the Commission dated December 4, 2010.
3. On June 1, 2011 the Commission issued an order directing the parties to answer certain questions. The order recognized that questions have arisen regarding the MISO’s Resource Adequacy Enhancements Proposal (“RAEF”) and determined that the propounded questions are relevant to the case as UE has applied to the Commission to extend its authority to continue to transfer functional control of its electric transmission system to MISO.
4. The propounded questions are separated primarily into two groups: questions 1 through 9 being directed to all parties and questions 10 through 15 being directed to UE and MISO.

Question 16 requests suggestions on any other questions that should be asked. Questions 1 through 9 relate primarily to the impact of the MISO's RAEP upon the Missouri's Electric Utility Resource Planning Process rule, 4 CSR 240.010 through 20.080; the impact of the MISO's RAEP on UE's operations; the propriety of certain potential actions contemplated by the order in response to the RAEP; to MISO's selection process for building new transmission projects; and to the authority of Ameren Transmission Company to exercise the right of eminent domain. Questions 10 through 15 relate to various issues, including MISO's interpretation of its Joint Operating Agreement with SPP, MISO's proposal to construct new facilities to connect Entergy into the MISO system, the cost of MISO's Multi-Value Projects to Missouri customers, how the Missouri Joint Municipal Electric Utility Commission's situation with the Prairie State coal plant compares and relates to MISO's dealing with Wisconsin Public Power, Inc.'s payment for transmission upgrades, assurances MISO will make to Citizen's Electric Cooperative for its current contract with Wabash Valley Power Association, and whether MISO employees will receive bonuses for successful implementation of the proposed capacity market.

5. With regard to questions 1 through 9, inasmuch as these questions relate to the plans, processes, interpretations and proposals of MISO or UE, to the propriety of the Commission taking certain actions impacting the relationship between MISO and UE, and to the willingness of MISO and UE to guarantee certain outcomes, SPP is not the appropriate party to answer such questions as put forth by the Commission in its order and respectfully declines to do so at this time. These are questions SPP will leave to MISO and UE to preliminarily answer at this time.

6. With regard to questions 10 through 15, such questions were directed to MISO and UE and primarily relate to MISO and UE as described in paragraph 5 above. Therefore, SPP is not

the appropriate party to answer such questions as put forth by the Commission in its order and respectfully declines to do so at this time.

7. As a party to this case, SPP reserves the right to ask questions and raise issues as they become relevant to the Commission's determination regarding the public interest of UE's continued participation in MISO as its regional transmission organization.

WHEREFORE, for the foregoing reasons, SPP respectfully requests the Commission accept SPP's responses to the questions propounded in the Commission's order.

Dated: June 16, 2011

Respectfully Submitted

/s/ David C. Linton

David C. Linton, # 32198  
David C. Linton, L.L.C.  
424 Summer Top Lane  
Fenton, Missouri 63026  
Telephone: (636) 349-9028  
Email: [djlinton@charter.net](mailto:djlinton@charter.net)

and

Erin E. Cullum, AR BIN 2004070  
Tessie Kentner, AR BIN 2007240  
415 N. McKinley, Suite 140  
Little Rock, AR 72205  
Telephone: (501) 688-2503  
Email: [ecullum@spp.org](mailto:ecullum@spp.org)

Attorneys for  
Southwest Power Pool, Inc.

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on June 16, 2011, to all counsel of record for parties in this case.

/s/ David C. Linton