

December 27, 2001

**VIA FEDERAL EXPRESS**

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
Governor Office Building  
200 Madison Street, Suite 100  
Jefferson City, MO 65101

FILED<sup>3</sup>

DEC 28 2001

Missouri Public  
Service Commission



Re: In the matter of the Application of Union Electric Company  
(d/b/a AmerenUE) for an Order Authorizing It to Withdraw  
from the Midwest ISO to Participate in the Alliance RTO  
Case No. EO-2001-684

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are an original and eight (8)  
copies of Union Electric Company's **Motion To Suspend**.

Please kindly acknowledge receipt of this filing by stamping as filed a copy of this  
letter and returning it to the undersigned in the enclosed, self-addressed, stamped  
envelope.

Sincerely,

A handwritten signature in cursive script, appearing to read "David B. Hennen".

David B. Hennen  
Associate General Counsel

DBH:rd  
enclosures

cc: Parties of Record

FILED<sup>3</sup>

DEC 28 2001

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

Missouri Public  
Service Commission

In the matter of the Application of Union )  
Electric Company (d/b/a AmerenUE) for an )  
Order Authorizing It to withdraw from the )  
Midwest ISO to Participate in the Alliance RTO )

Case No. EO-2001-684

**MOTION TO SUSPEND**

COMES NOW Union Electric Company d/b/a AmerenUE ("Company" or "UE") and pursuant to 4 CSR 240-2.080 hereby requests that the Missouri Public Service Commission ("Commission") suspend all further action in Case No. EO-2001-684 until March 1, 2002, and in support thereof the Company states the following:

On December 19, 2001, the Federal Energy Regulatory Commission ("FERC") met and announced, at its regularly scheduled meeting, major decisions affecting the future of regional transmission organizations ("RTOs") in the Midwest.

On December 20, 2001, FERC issued five interrelated orders codifying the announcements made at its December 19<sup>th</sup> meeting. The orders issued, as described by FERC, are "intended to move the process forward in establishing an optimally sized [RTO] in the Midwest and to support the establishment of viable, for-profit transmission companies that operate under an RTO umbrella and may, depending on their level of independence from market participants, perform certain of the RTO functions contained in [FERC's] Order No. 2000."

More specifically, in the order issued by FERC in Docket Nos. RT01-88-000 et al., FERC denied the Alliance Companies request to be a stand-alone RTO citing that the Alliance lacks sufficient size and scope to be a stand-alone RTO. FERC also directed the Alliance

Companies, which includes AmerenUE, to explore how their business plan (including the proposal for National Grid to become the managing member of the Alliance) can be accommodated within the Midwest ISO.

Recognizing that the Alliance Companies would need some time to react to this order, FERC directed the Alliance Companies "to file a statement of their plans to join an RTO, including the timeframe, within 60 days of the date of [the December 20] order."

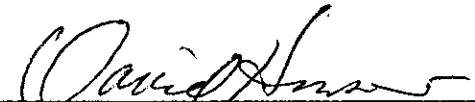
As a result, the request made in this application to withdraw from the Midwest ISO to participate in the Alliance RTO may become moot depending on the manner in which Ameren complies with the FERC order.

As such, the Company respectfully requests that the Commission suspend all further action in Case No. EO-2001-684 until March 1, 2002.

Respectfully submitted,

UNION ELECTRIC COMPANY  
d/b/a AmerenUE

By: \_\_\_\_\_



David Hennen, MBE #46776  
Associate General Counsel  
Ameren Services Company  
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dhennen@ameren.com

Dated: December 27, 2001

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was sent by U.S. Mail to the following parties of record on this 27<sup>th</sup> day of December, 2001:

General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

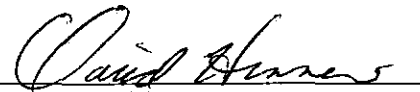
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