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Missouri Public Service Commission

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January 7, 2002

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Director, Utility Operations
ROBERT SCHALLENBERG
Director, Utility Services
DONNA M. PRENGER
Director, Administration
DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge
DANA K. JOYCE
General Counsel

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED³
JAN 07 2002

RE: Case No. EO-2001-684

Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of **STAFF'S RESPONSE TO COMPANY'S MOTION TO SUSPEND**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Dennis L. Frey
Associate General Counsel
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DLF:ccl
Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

JAN 07 2002

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

STAFF'S RESPONSE TO COMPANY'S MOTION TO SUSPEND

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and respectfully states:

1. On December 19, 2001, the Federal Energy Regulatory Commission ("FERC") met and announced major decisions affecting the future of Regional Transmission Organizations ("RTOs") in the Midwest. Most notably, the FERC approved the Midwest ISO to operate as the sole RTO in the Midwest. In so doing, the FERC denied the Alliance Companies' proposal to operate as a second RTO in the region and instead encouraged the Alliance Companies to develop proposals as to how they might operate as a for-profit transmission business under the MISO umbrella. In that connection, the FERC ordered the Alliance Companies to file, within sixty days, a status report regarding their efforts to join the MISO. Accordingly, Union Electric Company, d/b/a AmerenUE ("AmerenUE" or "Company"), as one of the Alliance Companies, is required to make its intentions known within sixty days.

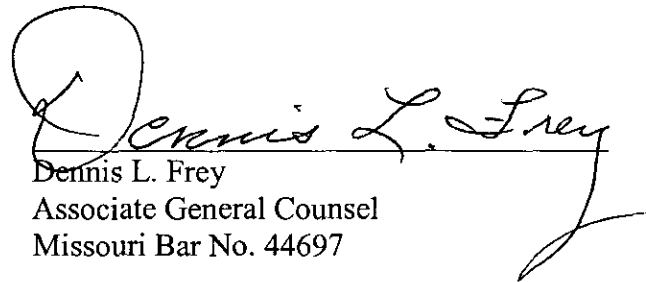
2. On December 28, 2001, AmerenUE filed with this Commission a Motion To Suspend, stating, among other things, that the Company's application in the instant case "may

become moot depending on the manner in which Ameren complies with the FERC order,” and requesting that the Commission suspend all further action in the instant case until March 1, 2002.

3. The Staff hereby informs the Commission that it has no objection to the Company’s Motion To Suspend.

Respectfully submitted,

DANA K. JOYCE
General Counsel

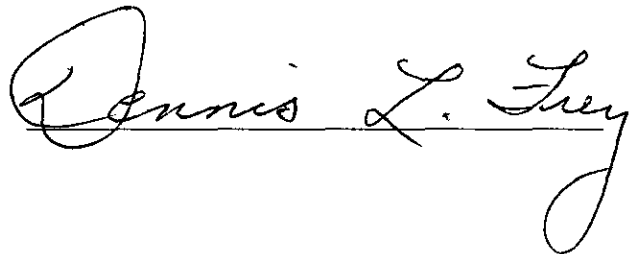


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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 7th day of January 2002.



Dennis L. Frey

**Service List for
Case No. EO-2001-684
Verified: January 7, 2002 (ccl)**

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