

# JONES DAY

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May 27, 2004

Ms. Magalie Roman Salas  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

**Re: Ameren Services Company,  
Revisions to Open Access Transmission Tariff:  
Docket No. ER04- -000**

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Dear Ms. Salas:

Pursuant to Section 35.13 of the Commission's regulations, 18 CFR § 35.13 (2003), Ameren Services Company, on behalf of Union Electric Company dba AmerenUE and Central Illinois Public Service Company dba AmerenCIPS (collectively, "Ameren"), submits for filing proposed revisions to the Open Access Transmission Tariff of the Ameren Operating Companies ("Ameren OATT"). The filing consists of six copies each of the following:

1. this transmittal letter;
2. the revised Ameren OATT;
3. a redline copy of the Ameren OATT highlighting the proposed changes; and
4. a Notice of Filing suitable for publication in the **Federal Register**.

Ameren also encloses a diskette containing the Notice of Filing.

## Reasons for the Filing

On May 1, 2004, Ameren transferred functional control of the transmission facilities of AmerenUE and AmerenCIPS to GridAmerica LLC ("GridAmerica"), an independent transmission company ("ITC") operating within the Midwest Independent Transmission System Operator, Inc. ("Midwest ISO"). Pursuant to an Appendix I ITC Agreement ("ITC Agreement") between GridAmerica and the Midwest ISO, GridAmerica cedes certain functions related to the provision of transmission service over GridAmerica facilities to the Midwest ISO.<sup>1</sup> As a result

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<sup>1</sup> See *Ameren Services Co.*, 101 FERC ¶ 61320 (2002) (Order Conditionally Accepting Agreements for Filing, Suspending Agreements, Subject to Refund, and Ordering Compliance Filing); *Midwest Independent Transmission System Operator, Inc.*, 103 FERC ¶ 61,190 (2003) (Order Accepting and Suspending Proposed Tariff Revisions, Initiating Investigation, Establishing Hearing and Settlement Judge Procedures, and Refund Effective Date and Consolidating Docket); *Ameren Services Co.*, 103 FERC ¶ 61,178 (2003) (Order Denying Rehearing, Conditionally Accepting Compliance Filing, Granting Clarification and Establishing Hearing and Settlement Judge Procedures); *Ameren Services Co.*, 104 FERC ¶ 61,097 (2003) (Order Granting Clarification, Denying Rehearing and Conditionally Accepting Compliance Filing); *Letter Order*, 104 FERC ¶ 61,178 (2003) (Order Approving Stipulation and Agreement between GridAmerica LLC, the GridAmerica Companies, the Midwest Independent

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of such transfer to GridAmerica, Ameren no longer provides transmission service under its own OATT and GridAmerica and the Midwest ISO now provide open access transmission service over Ameren's transmission facilities under the Midwest ISO OATT. Consequently, many provisions and certain schedules and attachments of Ameren's present OATT are now irrelevant or duplicative of the Midwest ISO OATT and Ameren files here to terminate such provisions, schedules and attachments, effective May 1, 2004.

Ancillary services related to open access service over Ameren facilities will be provided under the Midwest ISO OATT. However, as a Control Area Operator, Ameren will continue to provide certain ancillary services and those Ameren OATT schedules remain viable. The generation-related ancillary services that Ameren will continue to provide for the Midwest ISO in Ameren's service territory are as follows: Reactive Supply and Voltage Control from Generation Sources, Regulation and Frequency Response, Energy Imbalance, Operating Reserve-Spinning Reserve, and Operating Reserve-Supplemental Reserve. Accordingly, Ameren proposes that those portions of Ameren's OATT and the OATT schedules relating to these ancillary services remain in effect.

The other two GridAmerica companies, American Transmission Systems, Incorporated, a FirstEnergy Corp. subsidiary ("ATSI") and Northern Indiana Public Service Company ("NIPSCO") transferred functional control of their respective transmission facilities to GridAmerica and the Midwest ISO on October 1, 2003. The Commission has already approved similar filings by ATSI and NIPSCO to modify their respective OATTs. See *FirstEnergy Serv. Co.*, 105 FERC ¶ 61,113 (2003) and *Northern Indiana Public Service Company*, unpublished letter order of January 5, 2004 in Docket No. ER04-162-000.

Ameren will also retain, as part of its OATT, Schedule 4A, Illinois Retail Energy Imbalances Service, a tailored alternative to Schedule 4, Energy Imbalance Service. Schedule 4A fosters retail competition in Illinois by providing imbalance service to transmission customers arranging unbundled transmission of electric power and energy to Illinois retail customers. Such retail providers have service obligations with respect to imbalances under Illinois law which they may meet either by taking service under Schedule 4A or making other arrangements. The Commission accepted Schedule 4A for filing in *Ameren Services Company*, Docket No. ER00-612-000, 92 FERC ¶ 61,233 (2000).

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(continued...)

Transmission System Operator, Inc., and the Midwest ISO Transmission Owners); *Ameren Services Co.*, 104 FERC ¶ 61,179 (2003) (Order Accepting Agreement for Filing); *Ameren Services Co.*, Letter Order Accepting Amendments to ITC Agreement and Master Agreement, Docket Nos. ER02-2233-007, -008 (issued Sept. 12, 2003).

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### **Requested Effective Date**

Ameren requests that the Commission accept this filing to be effective May 1, 2004. Ameren hereby requests any waivers of the Commission's notice regulations necessary to permit the requested effective date. Good cause exists for such waiver as this is essentially an administrative filing to modify and tailor a tariff already approved and on file to reflect new circumstances. There will be no gap in service to affected customers.

### **Other Filing Requirements**

Communications and correspondence concerning this filing should be directed to the following:

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Ameren has served a copy of this filing on the Illinois Commerce Commission and the Missouri Public Service Commission. Ameren has served a copy of this transmittal letter on all affected customers. Such customers may contact Ameren to request a hard copy of the revised OATT or they may download the revised OATT from the Midwest ISO website at the following address: <http://oasis.midwestiso.org/OASIS/AMRN>. A copy of the filing is also available for public inspection in Ameren's offices in St. Louis, Missouri.

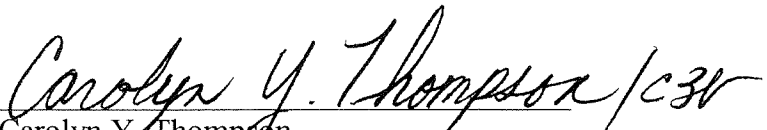
Ameren believes the materials submitted herewith comply with the Commission's filing requirements and will permit the Commission to review the revised OATT and determine it to be just and reasonable. To the extent Ameren may have misinterpreted or failed to comply with

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such filing regulations, Ameren respectfully requests waiver and that the Commission proceed to review and accept the revised OATT for filing without suspension or condition.

Respectfully submitted,

**Ameren Services Company**

By  /c3v  
Carolyn Y. Thompson  
One of its Attorneys