

6. Electricity is the largest cost incurred by Noranda to operate its plant. A safe, reliable, cost-based and adequate long term supply of electric power and energy is critical to Noranda's energy-intensive operations, including its ability to continue competitive and cost-effective operation of its plant. The operational characteristics of an aluminum smelting facility require highly reliable supplies of firm electrical power. Continued operations of that smelter demand electricity at cost-based rates that are not unreasonably expensive because of incorrect allocations of cost and expense through external dispatch agreements. Accordingly appropriate planning and costing of those resources is of critical concern to Noranda.

7. This case was established to investigate certain aspects of AmerenUE's operations that may have impact upon the level of its rates, both in the aggregate and those directly applicable to Noranda. Noranda may be directly affected by the outcome of this case and has a unique, direct and immediate interest in this proceeding that differs from the interest of any other party and from the general public. Therefore, it will aid the Commission and protect the public interest that Noranda be permitted to intervene in this proceeding so as to protect this unique interest.

8. At this early stage Noranda is unable to state its position on issues that may arise in this case. Indeed, one of the stated purposes of this case is to permit other proper