

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the Consideration     )  
of Adoption of the PURPA Section     )  
111(d)(16) Consideration of Smart     )  
Grid Investments Standard as Re-     )  
quired by Section 523 of the Energy     )  
Independence and Security Act of     )  
2007     )                                     EO-2009-0249

**APPLICATION FOR ORDER ALLOWING INTERVENTION  
OF NORANDA ALUMINUM, INC.**

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COMES NOW NORANDA ALUMINUM, INC. ("Noranda") pursuant to 4 C.S.R. 240-2.075 and applies to intervene herein. In support, Noranda respectfully states:

1. Noranda is a manufacturing corporation duly authorized to transact business in Missouri, operating an aluminum smelter and associated manufacturing and processing facilities at 391 St. Jude Industrial Park, New Madrid, MO 63869.

2. At its New Madrid smelter, Noranda employs roughly 1,100 employees and consumes electricity in the process of producing aluminum base metal and related products in substantial quantities and at an exceptionally high load factor. Noranda maintains a payroll of roughly \$57 million annually and its business activities provide significant and critically important economic support and stability to a 10-county region in Southeast Missouri. In addition to the payroll and electricity purchases, Noranda purchases some \$22 million of a variety of goods and services largely from regional suppliers.

3. On December 15, 2008, the Staff of the Commission Filed a Motion to Establish a Case, Provide Notice and Schedule a Prehearing Conference. By an Order on December 17, 2008, the Commission granted that Motion and established this case in a single order including Case Nos. EO-2009-0247, EO-2009-0248, EO-2009-0249 and EO-2009-0250.

4. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

Stuart W. Conrad, Esq.  
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with a courtesy copy to:

Donald E. Johnstone  
Competitive Energy Dynamics, LLC  
384 Blackhawk Drive  
Lake Ozark, MO 65049

and to:

Steve McPheeters  
Manager--St. Jude Industrial Park  
Noranda Aluminum, Inc.  
391 St. Jude Industrial Park  
New Madrid, MO 63869

5. Noranda seeks intervention because it believes that it will or may be impacted by the outcome of this proceeding. Noranda's interest in the terms and conditions of service is different from that of the general public, and will not or cannot adequately be represented by any other party. Therefore,

it will aid the Commission and protect and advance the public interest that Noranda be permitted to intervene in this proceeding to protect its interest which no other party is in a position properly to protect and adequately represent.

WHEREFORE, Noranda prays: (a) that it be permitted to intervene herein and be made a party hereto with all rights to have notice of and participate in hearings to present evidence, cross-examine witnesses, file briefs and participate in argument, should any be had; and (b) for all other needful and proper relief appropriate in the premises.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



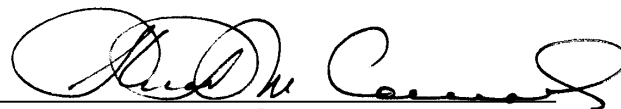
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ATTORNEYS FOR NORANDA ALUMINUM,  
INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by electronic means, by United States Mail, First Class postage prepaid, or by hand delivery to all known parties in interest upon their respective representatives or attorneys of record as reflected in the records maintained by the Secretary of the Commission through the EFIS system.

A handwritten signature in black ink, appearing to read "Stuart W. Conrad", written over a horizontal line.

Stuart W. Conrad

Dated: January 16, 2009