

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

Application of Union Electric Com-)
pany for a Certificate of Public)
Convenience and Necessity authoriz-)
ing it to construct, install, own,)
operate, control, manage and main-)
tain electric plant, as defined in)
§ 386.020(14), RSMo. to provide)
electric service in a portion of)
New Madrid, County, Missouri, as an)
extension of its existing certifi-)
cated area)

Case No. EA-2005-0180

**RESPONSE BY NORANDA ALUMINUM, INC. IN SUPPORT
OF MOTION FOR ADOPTION OF EXPEDITED PROCEDURAL SCHEDULE AND
MOTION FOR EXPEDITED TREATMENT**

Comes now NORANDA ALUMINUM INC. ("Noranda"), Applicant for Intervention, and SUPPORTS the December 20, 2004 Motion of Union Electric Company d/b/a AmerenUE ("AmerenUE") and in addition respectfully offers the following comments for the consideration of the Commission:

1. On December 20, 2004 AmerenUE filed its Application to modify its certificated service territory establishing this case. On December 21, 2004, Noranda filed its Application for Order Allowing Intervention in that matter. On the same date, Noranda moved that the time to respond to its Application for Order Allowing Intervention be shorted from 10 to 5 days.

2. Also on December 20, 2004, AmerenUE filed its Motion for Adoption of Procedural Schedule and Motion for Expedited Treatment ("Motion"). Noranda respectfully confirms

AmerenUE's statement that time is of particular concern to Noranda because its present electrical supply arrangements will expire on May 31, 2005.

3. Noranda would also confirm AmerenUE's statement that it will take, at the least, several weeks for Noranda to arrange alternative supplies to those referenced in the December 20, 2004 AmerenUE Application and that interruption in supply would cause serious and possibly permanent damage to Noranda and its operations in New Madrid. Accordingly, it is most important that this matter is expeditiously processed so that Noranda may know not later than late March of 2005 whether it may confidently expect to move forward with the transaction that has been arranged between Noranda and AmerenUE or whether Noranda must begin to make alternative arrangements to provide service to Noranda beginning June 1, 2005.

4. Noranda also wishes to clarify that the date that the present supply arrangement expires was established long before this matter was filed and is a date over which Noranda has no control. We want to assure the Commission that, while this matter must now be expeditiously handled, it has been in process for over one year.

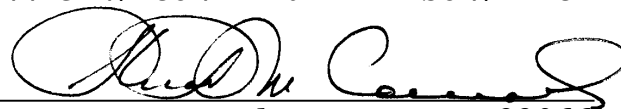
5. While supporting the schedule proposed by AmerenUE, we appreciate that schedule may be described as compressed. Noranda is submitting these comments so that the Commission may be assured that there is a reason behind the proposed schedule.

6. We regret the timing of submission of this critical matter has commingled the rather straightforward issues in this matter with another matter (Case No. EO-2004-0108) that apparently is in the final stages of resolution by the Commission. We were advised that such matter was expected to be concluded several months before it was even anticipated that this application would need to be submitted. We respectfully request the expedited processing by the Commission of this matter that is of great importance for Noranda, the public interests of Southeastern Missouri, and, indeed, the entire State.

WHEREFORE Noranda Aluminum, Inc. respectfully requests that these comments in support of AmerenUE's Motion for Expedited Procedural Schedule be considered by the Commission.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

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

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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 U.S. mail, postage prepaid addressed to all parties by their attorneys of record as disclosed by the pleadings and orders herein.



Stuart W. Conrad

Dated: December 22, 2004