

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

)	
In the Matter of Union Electric)	
Company, d/b/a Ameren Missouri's)	
Tariff to Increase Its Annual Revenues)	Case No. ER-2011-0028
for Electric Service)	
)	

**MEUA's First Set of Data Requests to
MIEC and Noranda Aluminum**

Item No.	Description
1.	What is Noranda's position regarding the appropriate class cost of service for the Large Transmission class?
2.	Please provide all CRU data providing costs for electricity for all US smelters.
3.	Please provide all CRU data providing costs for alumina for all US smelters.
4.	Please provide all CRU data providing labor costs for all US smelters.
5.	What is Noranda's cost of electricity (in \$ / Mwh) for the New Madrid smelter?
6.	What is Noranda's definition of "cost-competitive power?"
7.	Has Noranda quantified what "cost-competitive power" would be for service from AmerenUE to the New Madrid Smelter? If yes, please provide Noranda's quantification. Also, please provide all analyses supporting such quantification.
8.	In his direct testimony, Mr. Smith indicates that "electricity is the single largest operational cost of the New Madrid Smelter, constituting about one-third of its overall cost of producing primary aluminum." What is the second largest operational cost for the New Madrid Smelter? What percentage of overall cost of producing primary aluminum is represented by the second largest operational cost?
9.	What is the New Madrid Smelter's third largest operational cost? What percentage of overall cost of producing primary aluminum is represented by the third largest operational cost?
10.	What is the New Madrid Smelter's fourth largest operational cost? What percentage of overall cost of producing primary aluminum is represented by the fourth largest operational cost?

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11.	What is the New Madrid Smelter's fifth largest operational cost? What percentage of overall cost of producing primary aluminum is represented by the fifth largest operational cost?
12.	Does Noranda believe that it has any cost advantages over other domestic US smelters? If yes, please list all cost advantages.
13.	What date did Noranda Aluminum become publicly traded?
14.	What was the price per share of Noranda Aluminum's initial public offering?
15.	Please provide the closing price of Noranda Aluminum's stock on each day since its initial public offering.
16.	Please provide all analysis undertaken by Noranda which considers the option of self-generating electricity for the New Madrid smelter.
17.	Please provide the LME price of aluminum for each business day that aluminum was traded on the London Exchange in the past 12 months.
18.	At page 8 of his direct testimony, Mr. Smith indicates that Noranda has invested \$38 million "to expand capacity." What steps has Noranda taken to "expand capacity." How will this capacity expansion affect Noranda's electric usage?
19.	At page 5 of his testimony, Mr. Fayne refers to other smelters "cost of production." For the smelters listed on HWF-1, please provide Mr. Fayne's understanding of these smelters' relative "cost of production."

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20.	What is Mr. Fayne's understanding for the cost of electricity for the recently reopened Massena East smelter?
21.	Please list <u>all</u> smelters which Mr. Fayne believes has a cost of electricity tied "to the price of aluminum on the London Metal Exchange.
22.	Please provide a copy of the West Virginia legislation referred to by Mr. Fayne at page 6 of his testimony.
23.	Please provide Mr. Fayne's understanding of the current operational status of the Ravenswood smelter..
24.	Please provide Mr. Fayne's understanding of any plans to restart operations at the Ravenswood smelter.
25.	For each smelter on Schedule HWF-1, please provide Mr. Fayne's understanding of the state in which the smelter is located and the electric provider for each smelter.
26.	For each smelter listed in HWF-1, please provide a copy of any contract or tariff supporting the associated electric rate
27.	Please provide citations to all SEC filings in which Noranda warns that the Commission's decision in this case will have a significant impact on long-term sustainability.
28.	Please identify the individual at Noranda that is most knowledgeable on Noranda's position on class cost of service / rate design.

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29.	At page 29 of his direct testimony, Mr. Brubaker indicates that he has utilized a "different treatment of income taxes." Is Mr. Brubaker's treatment of income taxes in this case identical to the methodology used by Mr. Brubaker in Case No. ER-2010-0036? If no, please describe how Mr. Brubaker's methodology differs from that utilizes in Case No. ER-2010-0036.																		
30.	Is Mr. Brubaker's treatment of income taxes in this case identical to the methodology used by Mr. Brubaker in Case No. ER-2010-0355? If no, please describe how Mr. Brubaker's methodology differs from that utilizes in Case No. ER-2010-0355.																		
31.	Is Mr. Brubaker's treatment of income taxes in this case identical to the methodology used by Mr. Brubaker in Case No. ER-2010-0356? If no, please describe how Mr. Brubaker's methodology differs from that utilizes in Case No. ER-2010-0356.																		
32.	Other than his treatment of income taxes, please describe any other ways in which his allocation methodology in this case is different than that utilized in Case No. ER-2010-0036.																		
33.	Please confirm that the final revenue neutral results of MIEC's Class Cost of Service Study in Case No. ER-2007-0002 were as follows: <table border="0" style="width: 100%;"><tr><td style="width: 20%;"><u>Residential:</u></td><td style="width: 20%;">+14.1%</td><td style="width: 60%;">\$119,916,000</td></tr><tr><td><u>SGS:</u></td><td>-3.0%</td><td>(\$6,721,000)</td></tr><tr><td><u>LGS:</u></td><td>-11.6%</td><td>(\$48,701,000)</td></tr><tr><td><u>SP:</u></td><td>-12.8%</td><td>(\$23,288,000)</td></tr><tr><td><u>LPS:</u></td><td>-3.1%</td><td>(\$4,766,000)</td></tr><tr><td><u>LTS:</u></td><td>-26.6%</td><td>(\$36,440,000)</td></tr></table>	<u>Residential:</u>	+14.1%	\$119,916,000	<u>SGS:</u>	-3.0%	(\$6,721,000)	<u>LGS:</u>	-11.6%	(\$48,701,000)	<u>SP:</u>	-12.8%	(\$23,288,000)	<u>LPS:</u>	-3.1%	(\$4,766,000)	<u>LTS:</u>	-26.6%	(\$36,440,000)
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*By final results, MEUA means the results after any changes, corrections or modifications that may have taken place through the processing of the case.

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34. Please confirm that the final revenue neutral results of MIEC's Class Cost of Service Study in Case No. ER-2008-0318 were as follows:

<u>Residential:</u>	+16.2%	\$144,475,000
<u>SGS:</u>	-3.9%	(\$9,464,000)
<u>LGS / SP:</u>	-13.3%	(\$83,041,000)
<u>LPS:</u>	-9.9%	(\$15,889,000)
<u>LTS:</u>	-28.1%	(\$36,081,000)

*By final results, MEUA means the results after any changes, corrections or modifications that may have taken place through the processing of the case.

35. Please confirm that the final revenue neutral results of MIEC's Class Cost of Service Study in Case No. ER-2010-0036 were as follows:

<u>Residential:</u>	+13.3%	\$129,625,000
<u>SGS:</u>	-4.3%	(\$10,721,000)
<u>LGS / SP:</u>	-12.7%	(\$84,603,000)
<u>LPS:</u>	-7.4%	(\$12,700,000)
<u>LTS:</u>	-15.5%	(\$21,600,000)

*By final results, MEUA means the results after any changes, corrections or modifications that may have taken place through the processing of the case.