Exhibit No.:	
Issues:	Storm Information FAC
Witness:	Lena M. Mantle
Sponsoring Party:	MO PSC Staff
Type of Exhibit:	Rebuttal Testimony
File No.:	EU-2012-0027
Date Testimony Prepared:	March 14, 2012

MISSOURI PUBLIC SERVICE COMMISSION

REGULATORY REVIEW DIVISION

REBUTTAL TESTIMONY

OF

LENA M. MANTLE

UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

FILE NO. EU-2012-0027

Jefferson City, Missouri
March 2012

** **Denotes Highly Confidential Information** **

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BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for the Issuance of an Accounting Authority Order Relating to its Electrical Operations.	)))))	Case No. EU-2012-0027

AFFIDAVIT OF LENA M. MANTLE

STATE OF MISSOURI)
) **ss**
COUNTY OF COLE)

Lena M. Mantle, of lawful age, on her oath states: that she has participated in the preparation of the following Rebuttal Testimony in question and answer form, consisting of 14 pages of Rebuttal Testimony to be presented in the above case, that the answers in the following Rebuttal Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true to the best of her knowledge and belief.

Lena M Mantle
Lena M. Mantle

Subscribed and sworn to before me this 14th day of March, 2012.

SUSAN L. SUNDERMEYER
Notary Public - Notary Seal
State of Missouri
Commissioned for Callaway County
My Commission Expires: October 03, 2014
Commission Number: 10942086

Susan L Sundermeyer
Notary Public

REBUTTAL TESTIMONY

OF

LENA M. MANTLE

UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

CASE NO. EU-2012-0027

Q. Please state your name and business address.

A. My name is Lena M. Mantle and my business address is Missouri Public Service Commission, P.O. Box 360, Jefferson City, Missouri 65102.

Q. What is your current position with the Missouri Public Service Commission ("Commission")?

A. I am the manager of the Energy Unit of the Tariff, Safety, Economic, and Engineering Analysis Department of the Regulatory Review Division.

Q. Please state your educational background and experience.

A. These are contained in Schedule LMM-1. In addition to the experience detailed in Schedule LMM-1, one of my responsibilities as manager of the Energy Unit is to receive reports from electric and gas utilities when there are large outages for any reason. I am a State Emergency Management Agency ("SEMA") contact for the Commission and I serve as a Commission representative at the Missouri State Emergency Operations Center ("EOC") when it is activated.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my testimony is to respond to Ameren Missouri witness Lynn M. Barnes statements regarding the following:

1. The January 28, 2009 ice storm;

2. The load of Noranda immediately following the ice storm; and

3. Her description of the Commission's Report and Order in Case No. EO-2010-0255.

Q. Was the EOC activated as a result of the January 2009 ice storm?

A. Yes, it was. I rotated, representing the Commission, with other Commission Staff ("Staff") at the State EOC January 28, 2009 through February 3, 2009, for activities related to this storm.

Q. What is the Commission's representative's role at the State EOC?

A. The Commission's representative is the point of contact for other state or federal agency or county EOCs for responding to questions of or about the restoration of electrical, natural gas, and telecommunications services. In addition to providing information on the number of customers without service and expected restoration times, the representative is the liaison between the utilities and the EOC for relaying information about vital services such as when power will be restored to water and sewage pumping stations. If there are reports of lines down across roads, the representative works with others at the EOC to determine what utility owns the line and contacts the utility, whether it be an investor-owned utility, rural electric cooperative or municipal utility.

Q. Ms. Barnes states on page 3 of her direct testimony, "On January 27, 2009[1], an extraordinary, unanticipated and unusually devastating ice storm struck Southeast Missouri." Do you agree with that characterization of that ice storm?

A. Mierriam-Webster.com defines extraordinary as going beyond what is usual, regular, or customary; unanticipated as unexpected, unforeseen; unusual as uncommon, rare; and devastate as either 1) to bring to ruin or desolation by violent action, or 2) to reduce to

[1] I assume that the ice storm that Ms. Barnes is referring to is the one that struck Southeast Missouri on January 28, 2009.

chaos, disorder or helplessness. For the purpose of this testimony, Staff defines a storm[2] as a disturbed state of the atmosphere, affecting the Earth's surface, with destructive weather that results in a large number of customer outages. It is impossible to say what a usual, regular or customary storm is. From working through several storm responses at the State EOC, I know that every storm is unique and recovery from each storm is unique. The January 28, 2009 ice storm was somewhat unanticipated. Weather reports had predicted the possibility of an ice storm in Southern Missouri but not specifically the Missouri bootheel. The magnitude of ice accumulation was definitely unusual and it was devastating for the people and businesses in Southeast Missouri who actually experienced it.

Q. Ms. Barnes states on page 4 of her testimony that the impact of ice storms on customers is typically much less severe than the impact on Noranda. Ms. Barnes further states that "[d]amage is typically limited to lost refrigerated food or in a worst case, frozen water pipes." Do you agree with these statements?

A. No. A typical electric customer impacted by an ice storm completely loses power for some extended period of time. For this storm the majority of impacted customers were completely without power for days.[3] If a typical residential electric customer could have continued to receive some level of service throughout the storm, as Noranda did, they would have been able to avoid losing refrigerated food and having their pipes freeze. In addition, the

[2] The National Oceanic and Atmospheric Administration (NOAA) National Weather Service defines storm as "Any disturbed state of the atmosphere, especially affecting the Earth's surface, and strongly implying destructive and otherwise unpleasant weather. Storms range in scale from tornadoes and thunderstorms to tropical cyclones to synoptic-scale extratropical cyclones."

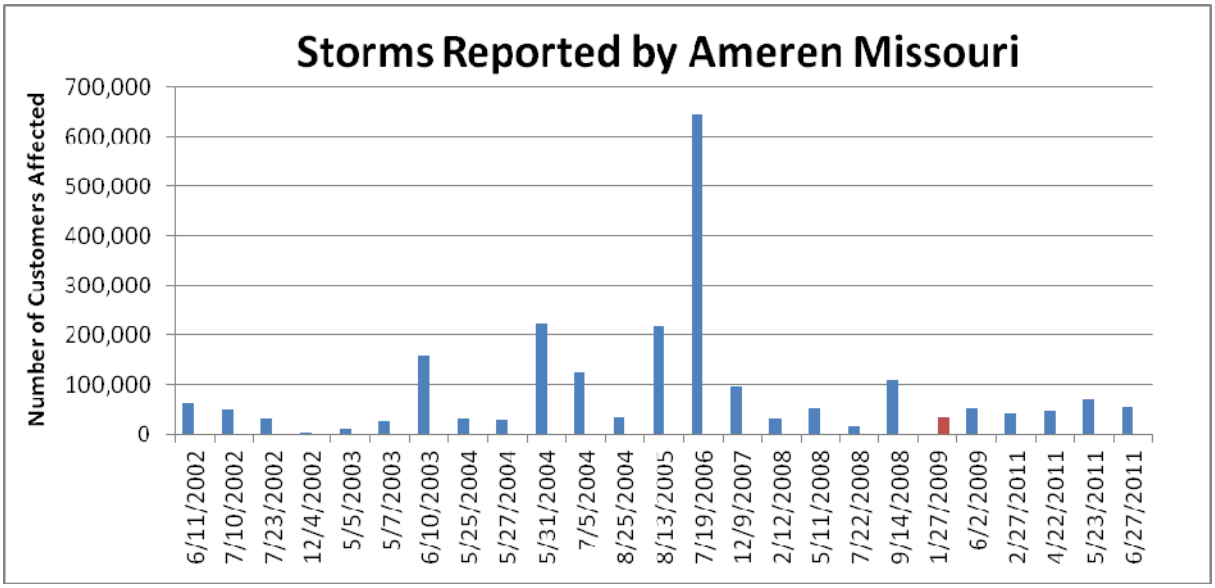
[3] Ameren Missouri customers were all restored within a week. Some rural electric cooperative customers and customers of municipal utilities in the area were without service for three weeks or more.

worst case for some customers was not frozen water pipes but instead was severe physical damage to their home or business, often caused by trees or limbs falling due to ice build-up. Weatherheads[4] were also damaged which required the customer to hire an electrician to make repairs before electric service could be restored. Recognizing the significance of the weatherhead issue caused by this storm, the Commission released a media advisory on February 3, 2009, to address the issue. While Ameren Missouri customers, who were without power for days due to damaged weatherheads and other damage, do not individually generate the same level of revenues that Noranda does, from the public comments the Commission received, the damage for many customers was not "much less severe." Many customers, both residential and non-residential, other than Noranda, were coping with the impact of the ice storm long after the power was restored and the ice melted.

Q. Was the ice storm extraordinary from Ameren Missouri's perspective?

A. As I stated before, every storm is unique. Ameren Missouri has experienced a number of storms since June 2002. As a measure of what a "usual, regular or customary" storm would be, Staff considered the number of customers affected, i.e., experienced an outage, for the storms Ameren Missouri reported to Staff since June 2002. These are shown in the graph below. The number of customers impacted by the January 2009 ice storm is shown in red.

[4] Customers are responsible for their weatherheads that keep rain and other material out of the pipe riser. The pipe riser serves as a guide and protection for the lines entering the meter box.



Without minimizing the impact of the January 2009 storm on affected customers, compared to the number of customers affected by some of these other storms, the January 2009 storm was not extraordinary. While the damage from most of the other storms was due to wind, almost 97,000 Ameren Missouri customers were impacted by the ice storm in Central Missouri in December 2007 and 31,000 customers were impacted by an ice storm in the Cape Girardeau area just three months later in February 2008.

The average number of customers per outage from June 2002 through June 2011 was 90,600 customers. Removal of the 645,000 customers affected by the July 2006 storms, reduces the average number of customers affected by outages to 67,000. The 35,000 customers affected by the January 2009 ice storm is not significant when compared to the number of Ameren Missouri customers affected by other storms since 2002. From the perspective of the impact on Ameren Missouri, other than the Noranda aluminum plant, Ameren Missouri's largest load customer, significantly reducing its electricity usage for months afterward, it was not an extraordinary storm.

Q. Was the ice storm unanticipated by Ameren Missouri?

A. No, it was not as shown by the January 26, 2009 Ameren Missouri press release attached as Schedule LMM-2. This press release tells how Ameren Missouri had begun to mobilize materials and crews to the area and began making the logisitic arrangements necessary to accommodate the crews. A mobile command center and two storm trailers were dispatched to Southeast Missouri in addition to the storm trailer that was permanently based in Cape Girardeau.

Q. Was Ameren Missouri prepared for this storm?

A. Ameren Missouri was well prepared for this ice storm because of lessons that it learned from the extraordinary and unanticipated outages of more than 100,000 customers in June 2003, May 2004, August 2005, July 2006 and September 2008.

Q. What makes this storm different from the other storms Ameren Missouri has experienced since 2002?

A. The impact that this ice storm had on Noranda – Ameren Missouri's largest customer and in turn, the impact that the reduced usage of Noranda had on Ameren Missouri.

Q. Was the storm unusually devastating for Ameren Missouri?

A. Although the storm was devastating to Ameren Missouri's system in its southeast region with 95% of its customers out and 3,000 poles needing replaced, it was not devestating to Ameren Missouri's total system. Ameren Missouri managed to restore all of its customers within a week when the rural electric cooperatives and the municipal utilties that were impacted took as much as three weeks to restore their customers.

Q. Ms. Barnes states on page 3 of her testimony that Noranda lost power. Is that correct?

A. Staff reviewed load research data provided by Ameren Missouri that shows the hourly loads of Noranda for the time period of January 1, 2009 through August 31, 2010. The minimum load for Noranda during that time period was 22.8 MW which occurred two days after the ice storm began. The load research data did not show that the Noranda load ever went down to zero and it was only below 100 MW for 16 hours.

Q. How does this 22.8 MW compare to Noranda's typical average hourly demand?

A. The load research data showed that Noranda's average hourly demand January 1, 2009 through January 26, 2009 to be 472 MW. For the last month of Noranda hourly load research data, August 2010, the average load was 473 MW. So even though Noranda did not completely lose power, its usage did drop 95%, resulting in the damage at the plant described by Ms. Barnes on page 3 of her direct testimony.

Q. Is load research data the only source that you have that indicates that Noranda's aluminum plant did not go "completely out of service immediately following the ice storm" as Ms. Barnes portrays in her direct testimony on page 3?

A. No. Attached to this testimony as Schedule LMM-3 is a Friday, January 30, 2009 email from Steve Kidwell, who was Vice President of Regulatory Affairs for AmerenUE at the time of the January 2009 ice storm, which was forwarded to Staff by Gaye Suggett of AmerenUE Regulatory Affairs. In this email, Mr. Kidwell states, "While Noranda has not lost all power, it is my understanding that its present power supply is only approximately one-fourth of its normal power needs."

Q. Did this loss of load have an impact on Ameren Missouri?

A. Yes, it did. When Noranda's aluminum plant lost production capacity, it reduced the amount of electricity Noranda purchased from Ameren Missouri. The loss of sales to Noranda impacted Ameren Missouri sales because Noranda normally buys a very large amount of electricity. Before the damage resulting from the ice storm, Noranda hourly consumed more than 460 megawatts of electricity at a very high load factor, meaning it used nearly the same amount of electric power every hour of every day throughout the year.

Because of the damage to Noranda's production capacity, Ameren Missouri stood to lose approximately four percent of Ameren Missouri's base-rate revenue requirement from which Ameren Missouri's rates were developed.

Q. Was the impact of a sudden reduction in Noranda's load unforeseen by Staff?

A. No, Staff was aware of the potential and raised it when Ameren Missouri and Noranda sought for Noranda to become a customer of Ameren Missouri. In Case No. EA-2005-0180[5], the case in which the Commission approved a certificate of public convenience and necessity for Ameren Missouri so that it could provide service to Noranda, Staff stated on page 7 of *Staff Suggestions In Support Of Unanimous Stipulation And Agreement*:

> In addition, if Noranda, for example, closed down, without the intervention of the five-year notice provision, the risk of other Missouri retail electricity customers paying more is mitigated by AmerenUE's opportunity to sell the energy represented by the Noranda load into the off-system market for electricity.

Q. Isn't that exactly what Ameren Missouri did after the ice storm severely reduced Noranda's load?

[5] Case No. EA-2005-0180 *Application of Union Electric Company for a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Control, Manage and Maintain 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 Certificated Area*

A. Yes it is. Since Ameren Missouri would not be selling as much electric power to Noranda, it had more electric power available to sell in the off-system market.

However, there was a change in circumstances from when the Commission approved the *Unanimous Stipulation and Agreement* in Case No. EA-2005-0180 effective on March 20, 2005. At the time of Case No. EA-2005-0180 and until the tariff sheets resulting from the Report and Order to Case No. ER-2008-0318 went into effect there was no fuel adjustment clause ("FAC") for Ameren Missouri. Rate design for the FAC was settled by the parties pursuant to a *Stipulation and Agreement as to All FAC Tariff Rate Design Issues*. Under the FAC that the Commission approved in Case No. ER-2008-0318 the day before the ice storm, changes in Ameren Missouri's revenue from off-system sales offset changes in Ameren Missouri's fuel purchase costs, subject to a 95/5 sharing mechanism. Ameren Missouri had to pass 95 percent of any net changes in fuel/purchased power costs and off-system sales revenues through to its customers outside of a general rate case. The other 5 percent was absorbed by or benefitted Ameren Missouri's shareholders.

Ameren Missouri's fuel adjustment clause benefitted Ameren Missouri because it allowed Ameren Missouri to pass through to customers 95 percent of changes to its fuel costs without the delay of filing a rate case. When fuel costs are rising, which generally has been the case over the recent past, the benefit of the FAC to Ameren Missouri is not only certainty in recovering increased costs, but not incurring additional costs of a new rate case to recover those increased fuel costs.

However, that 95/5 sharing mechanism also applied to changes in Ameren Missouri's off-system sales. That meant 95 percent of any increase in off-system sales benefitted ratepayers by offsetting the fuel costs under the agreed to FAC rate. Without the FAC, 100

percent of the off-system sales revenues above what was included in rates would have benefited Ameren Missouri's shareholders. Given the FAC rate design in Case No. ER-2008-0318, if Ameren Missouri made more off-system sales it would be unable to retain 95 percent of that revenue. The 5 percent retained by the Ameren Missouri would comprise a revenue shortfall for Ameren Missouri's shareholders in comparison to the revenue that they would have received from Noranda if the ice storm had not occurred.

Q. Did Ameren Missouri understand this result would occur?

A. Yes, it did. Ameren Missouri first attempted to avoid realizing a revenue shortfall due to the lost production capacity at Noranda's aluminum plant by asking the Commission to grant a rehearing regarding its Case No. ER-2008-0318 *Report and Order* to modify the FAC Ameren had requested and the Commission had granted in that *Report and Order* to exclude revenue from off-system sales contracts to be used as offsets to the "lost sales" to Noranda.[6] The Commission denied Ameren Missouri's application for rehearing in an order issued on February 19, 2009.[7]

In that Order, the Commission found that it could not modify the FAC tariff in the manner Ameren Missouri requested without setting aside the approved *Order Approving Stipulation and Agreement As To All FAC Tariff Rate Design Issues* it had approved, reopening the record to take evidence on the appropriateness of the proposed change, and making a decision before the March 1, 2009 operation-of-law date for the rate case. The

[6] *In the Matter of Union Electric Company d/b/a AmerenUE's Tariffs To Increase its Annual Revenues for Electric Service,* File No. ER-2008-0318, Application for Rehearing and Motion for Expedited Treatment (February 5, 2009).

[7] *In the Matter of Union Electric Company d/b/a AmerenUE's Tariffs To Increase its Annual Revenues for Electric Service,* File No. ER-2008-0318, Order Denying AmerenUE's Application for Rehearing (February 19, 2009).

Commission concluded that such action was "obviously impossible" and on that basis denied Ameren Missouri's Application for Rehearing. The Commission's Order did not make any decision or ruling on the merits of Ameren Missouri's proposal, nor did the Commission take any evidence on the merits of that proposal.

On the same day it denied Ameren Missouri's Application for Rehearing, the Commission approved Ameren Missouri's rate case compliance tariff sheets, including the FAC tariff sheets, to go into effect on March 1, 2009.

Q. Did Ameren Missouri have another alternative way at that point to keep the revenues from the AEP and Wabash contracts?

A. Yes, it did. Rather than letting the FAC tariff sheets go into effect – restricting the revenue it would keep from the AEP and Wabash contracts to just 5 percent – Ameren Missouri could have withdraw its FAC tariff sheets which would have resulted in Ameren Missouri keeping 100 percent of the off-system sales contracts revenues.

Q. Did Ameren Missouri withdraw its FAC tariff sheets?

A. No, it did not.

Q. How much revenue did Ameren Missouri get through its FAC by not withdrawing the tariff sheets in Case No. ER-2008-0318?

A. Ameren Missouri was able to bill its customers over $122 million through its FAC for accumulation periods from March 2009 through May 2010.

Q. Was Ameren Missouri's rehearing request its only attempt to avoid a reduction in its revenue because of the reduction in electricity usage at the Noranda aluminum plant?

A. No, it was not. With its FAC in effect, Ameren Missouri began looking for a means to sell the power available due to the lost Noranda load. In replacing that load,

Ameren Missouri sought to enter into sales contracts that would closely resemble the service it had provided to the Noranda aluminum plant by rebalancing its revenue stream with regard to the type of customer it would serve and its credit exposure. Ameren Missouri also sought to enter into contracts where its revenue from those contracts would be excluded from being treated as revenues in its FAC.

Q. Did Ameren Missouri enter into contracts to sell the power now available for sale due to the reduction in Noranda's load?

A. Yes, it did. Ameren Missouri entered into two contracts. The first was with American Electric Power Service Corporation ("AEP") for 100 megawatts for 15 months. The second was with Wabash Valley Power Association, Inc. ("Wabash"), to serve Citizens Electric Corporation load in Missouri. That purchased power contract was for 150 megawatts for 18 months.

Q. Did Ameren Missouri flow the revenues from these contracts back to its customers through its FAC?

A. No, not until the Commission ordered it to begin doing so. In File No. EO-2010-0255, the first prudence review under Ameren Missouri's FAC, the Commission explicitly "determine[d] that [Ameren Missouri] acted imprudently, improperly and unlawfully when it excluded revenues derived from power sales agreements with AEP and Wabash from off-system sales revenue when calculating the rates charged under its fuel adjustment clause"[8] and ordered that 95% of the margins from those contracts during the period March 1, 2009, to September 30, 2009 be flowed through to customers—the aggregate

[8] *In the Matter of the First Prudence Review of Costs Subject to the Commission-Approved Fuel Adjustment Clause of Union Electric Company d/b/a Ameren Missouri*, File No. EO-2010-0255, *Report and Order*, Summary, p. 2. (2011)

sum of $17,169,838 plus interest at Ameren Missouri's short-term borrowing rate after September 30, 2009, until Ameren Missouri refunds the money to its ratepayers.

Q. Ms. Barnes states that "the Commission determined that all of the costs and revenues associated with these contracts will have to be flowed through to customers via the FAC." Is that correct?

A. No, it is not correct. The first prudence review only included part of the terms of these contracts. The same issue for the remainder of the terms of these contracts is presently being litigated before the Commission in the second prudence review under Ameren Missouri's fuel adjustment clause in File No. EO-2012-0074. In this second prudence review, Staff is asserting Ameren Missouri was imprudent for not including all costs and revenues associated with the Wabash and AEP contracts during the period of October 1, 2009 to June 20, 2010, in determining the associated FAC charges it billed to its customers, just as Staff earlier asserted, and the Commission found, in File No. EO-2010-0255 that Ameren Missouri was imprudent for how it treated all costs and revenues associated with the Wabash and AEP contracts for the period March 1 through September 30, 2009. Staff is asserting in the second prudence review case that, due to that imprudence, Ameren Missouri should refund to its customers, in aggregate, ** _____ ** plus interest accrued at Ameren Missouri's short-term interest rate until refunded.

Q. Is $17,169,838 plus ** _____ ** all of Ameren Missouri's revenues from the AEP and Wabash contracts?

A. No, it is not. In Ameren Missouri's rate Case No. ER-2010-0036, filed on July 24, 2009, about four months after its rates from Case No. ER-2008-0318 took effect, the parties, including Ameren Missouri, stipulated, and the Commission approved, that the

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definition of off-system sales in the FAC tariff provisions would be changed to specifically exclude long-term full and partial requirements sales to Missouri municipalities. As a result, under Ameren Missouri's revised tariff that became effective June 21, 2010, Ameren Missouri has treated its revenues from the Wabash and the AEP contracts as off-system sales and flowed the costs and revenues from them through its FAC since that date – June 21, 2010.

Q. If, for some reason, the load at the Noranda aluminum plant drops significantly again, would Ameren Missouri be facing the same situation that it did after the January 2009 ice storm?

A. No, it would not. In Case No. ER-2010-0036, by a Commission-approved *First Nonunanimous Stipulation and Agreement* of the parties, a factor—the "N" factor—was added to Ameren Missouri's FAC tariff sheets. This factor allows for an adjustment triggered by a reduction in service classification 12(M) billing determinants. This adjustment only occurs if Noranda's monthly load falls by 40,000,000 kWh or more below the monthly billing determinants set in the last rate case. That adjustment is still in Ameren Missouri's fuel adjustment clause tariff sheets but has never been triggered.

Q. Does this conclude your rebuttal testimony?

A. Yes, it does.

Education and Work Experience Background for
Lena M. Mantle, P.E.
Energy Department Manager
Utility Operations Division

I received a Bachelor of Science Degree in Industrial Engineering from the University of Missouri, at Columbia, in May 1983. I joined the Research and Planning Department of the Missouri Public Service Commission in August 1983. I became the Supervisor of the Engineering Analysis Section of the Energy Department in August, 2001. In July 2005, I was named the Manager of the Energy Department. I am a registered Professional Engineer in the State of Missouri.

In my work at the Commission from May 1983 through August 2001 I worked in many areas of electric utility regulation. Initially I worked on electric utility class cost-of- service analysis. As a member of the Research and Planning Department, I participated in the development of a leading edge methodology for weather normalizing hourly class energy for rate design cases. I applied this methodology to weather normalize energy in numerous rate increase cases. I was actively involved in the writing of the Commission's Chapter 22, Electric Resource Planning rules in the early 1990's and am actively involved in updating the rules.

My responsibilities as the Supervisor of the Engineering Analysis section considerably broadened my work scope. This section of the Commission Staff is responsible for a wide variety of engineering analysis including electric utility fuel and purchased power expense estimation for rate cases, generation plant construction audits, review of territorial agreements and resolution of customer complaints. As the Manager of the Energy Department, I oversee the activities of the Engineering Analysis section, the electric and natural gas utility tariff filings, the Commission's natural gas safety staff, fuel adjustment clause filings, resource planning compliance review and the class cost-of-service and rate design for natural gas and electric utilities.

In my work at the Commission I have participated in the development or revision of the following Commission rules:

4 CSR 240-3.130	Filing Requirements and Schedule of Fees for Applications for Approval of Electric Service Territorial Agreements and Petitions for Designation of Electric Service Areas
4 CSR 240-3.135	Filing Requirements and Schedule of Fees Applicable to Applications for Post-Annexation Assignment of Exclusive Service Territories and Determination of Compensation
4 CSR 240-3.161	Electric Utility Fuel and Purchased Power Cost Recovery Mechanisms Filing and Submission Requirements
4 CSR 240-3.162	Electric Utility Environmental Cost Recovery Mechanisms Filing and Submission Requirements
4 CSR 240-3.190	Reporting Requirements for Electric Utilities and Rural Electric Cooperatives
4 CSR 240-14	Utility Promotional Practices
4 CSR 240-18	Safety Standards
4 CSR 240-20.015	Affiliate Transactions
4 CSR 240-20.090	Electric Utility Fuel and Purchased Power Cost Recovery Mechanisms
4 CSR 240-20.091	Electric Utility Environmental Cost Recovery Mechanisms
4 CSR 240-22	Electric Utility Resource Planning

I have testified before the Commission in the following cases:

CASE NUMBER	**TYPE OF FILING**	**ISSUE**
ER-84-105	Direct	Demand-Side Update
ER-85-128, et. al	Direct	Demand-Side Update
EO-90-101	Direct, Rebuttal & Surrebuttal	Weather Normalization of Sales; Normalization of Net System
ER-90-138	Direct	Normalization of Net System
EO-90-251	Rebuttal	Promotional Practice Variance

EO-91-74, et. al.	Direct	Weather Normalization of Class Sales; Normalization of Net System
ER-93-37	Direct	Weather Normalization of Class Sales; Normalization of Net System
ER-94-163	Direct	Normalization of Net System
ER-94-174	Direct	Weather Normalization of Class Sales; Normalization of Net System
EO-94-199	Direct	Normalization of Net System
ET-95-209	Rebuttal & Surrebuttal	New Construction Pilot Program
ER-95-279	Direct	Normalization of Net System
ER-97-81	Direct	Weather Normalization of Class Sales; Normalization of Net System; TES Tariff
EO-97-144	Direct	Weather Normalization of Class Sales; Normalization of Net System;
ER-97-394, et. al.	Direct, Rebuttal & Surrebuttal	Weather Normalization of Class Sales; Normalization of Net System; Energy Audit Tariff
EM-97-575	Direct	Normalization of Net System
EM-2000-292	Direct	Normalization of Net System; Load Research;
ER-2001-299	Direct	Weather Normalization of Class Sales; Normalization of Net System;
EM-2000-369	Direct	Load Research
ER-2001-672	Direct & Rebuttal	Weather Normalization of Class Sales; Normalization of Net System;
ER-2002-1	Direct & Rebuttal	Weather Normalization of Class Sales; Normalization of Net System;
ER-2002-424	Direct	Derivation of Normal Weather
EF-2003-465	Rebuttal	Resource Planning
ER-2004-0570	Direct	Reliability Indices
ER-2004-0570	Rebuttal & Surrebuttal	Energy Efficiency Programs and Wind Research Program

EO-2005-0263	Spontaneous	DSM Programs; Integrated Resource Planning
EO-2005-0329	Spontaneous	DSM Programs; Integrated Resource Planning
ER-2005-0436	Direct	Resource Planning
ER-2005-0436	Rebuttal	Low-Income Weatherization; Energy Efficiency Programs
ER-2005-0436	Surrebuttal	Low-Income Weatherization; Energy Efficiency Programs; Resource Planning
EA-2006-0309	Rebuttal, Surrebuttal	Resource Planning
EA-2006-0314	Rebuttal	Jurisdictional Allocation Factor
ER-2006-0315	Supplemental Direct	Energy Forecast
ER-2006-0315	Rebuttal	DSM; Low-Income Programs
ER-2007-0002	Direct	DSM Cost Recovery
GR-2007-0003	Direct	DSM Cost Recovery
ER-2007-0004	Direct	Resource Planning
ER-2008-0093	Rebuttal	Fuel Adjustment Clause, Low-Income Program
ER-2008-0318	Surrebuttal	Fuel Adjustment Clause
ER-2009-0090	Surrebuttal	Capacity Requirements
ER-2010-0036	Supplemental Direct, Surrebuttal	Fuel Adjustment Clause
EO-2010-0255	Direct/Rebuttal	Fuel Adjustment Clause Prudence
ER-2010-0356	Rebuttal, Surrebuttal	Resource Planning Issues
ER-2011-0028	Rebuttal, Surrebuttal	Fuel Adjustment Clause

<u>Contributed to Staff Direct Testimony Report</u>

ER-2007-0291	DSM Cost recovery
ER-2008-0093	Fuel Adjustment Clause, Experimental Low-Income Program
ER-2008-0318	Fuel Adjustment Clause

ER-2009-0090	Fuel Adjustment Clause, Capacity Requirements
HR-2009-0092	Fuel Adjustment Rider
ER-2010-0036	Environmental Cost Recovery Mechanism
ER-2010-0356	Resource Planning Issues
ER-2011-0028	Fuel Adjustment Clause

Sundermeyer, Susan

From: Beck, Dan
Sent: Wednesday, March 14, 2012 9:03 AM
To: Mantle, Lena
Subject: FW: Ice Storm
Attachments: Noranda_Power_Outage_Press_Release.pdf; Noranda 8K.pdf

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From: Mantle, Lena
Sent: Saturday, January 31, 2009 10:21 AM
To: Williams, Nathan; Dottheim, Steve; Beck, Dan; Henderson, Wess
Subject: FW: Ice Storm

From: Suggett, Gaye L [GSuggett@ameren.com]
Sent: Friday, January 30, 2009 4:16 PM
To: Mantle, Lena; Dietrich, Natelle*; Schallenberg, Bob
Subject: FW: Ice Storm

fyi

From: Kidwell, Steve M
Sent: Friday, January 30, 2009 4:11 PM
To: 'robert.clayton@psc.mo.gov'; 'jeff.davis@psc.mo.gov'; 'kevin.gunn@psc.mo.gov'; 'terry.jarrett@psc.mo.gov'; 'connie.murray@psc.mo.gov'
Cc: Voss, Tom R; Mark, Richard J; Zdellar, Ron C; Byrne, Thomas M; 'Jim Lowery'; Tatro, Wendy K; 'gencounsel@psc.mo.gov'; 'opcservice@ded.mo.gov'; 'kevin.thompson@psc.mo.gov'; 'john@johncoffman.net'; 'saschroder@hstly.com'; 'mevans@hstly.com'; 'mpendergast@lacledegas.com'; 'rzucker@lacledegas.com'; 'khenry@greatriverslaw.org'; 'bamorrison@greatriverslaw.org'; 'hrobertson@greatriverslaw.org'; 'shelley.woods@ago.mo.gov'; 'llangeneckert@spvg.com'; 'dmvuylsteke@bryancave.com'; 'stucon@fcplaw.com'; 'todd.iveson@ago.mo.gov'; 'carew@bscr-law.com'; 'rdc_law@swbell.net'; Laurent, Dan G; Cooper, Wil L; Suggett, Gaye L
Subject: Ice Storm

As you know, a devastating ice storm hit southeast Missouri on Tuesday of this week. Substantial numbers of both AmerenUE and Cooperative customers have lost service. At present, approximately 29,000 AmerenUE customers remain without power. The Cooperatives have an even greater number of customers out of service at this time.

One of the customers impacted by the devastating effects of this storm is Noranda, which as you know receives physical delivery of the power it purchases from AmerenUE via a separate transmission arrangement with Associated Electric Cooperative, Inc. (AECI). While Noranda has not lost all power, it is my understanding that its present power supply is only approximately one-fourth of its normal power needs. While AmerenUE has been in regular contact with Noranda, we do not currently have complete information from Noranda about how this reduction in supply to the facility will affect Noranda's operations on a going-forward basis. Noranda has issued a press release and made an 8-K filing with the United States Securities and Exchange Commission (both of which are attached) indicating that approximately 75% of its production has currently been eliminated, and that based "on preliminary information and management's initial assessment, restoring full capacity may take up to 12 months, with partial capacity phased in during the 12 month period."

AmerenUE is doing everything it can to assist Associated in restoring service to Noranda, including working through the night last night to create a new supply from our Sikeston substation to support electricity deliveries to the customer. I assure you that our crews will continue to do everything they can to restore service safely, and as quickly as possible, to all affected customers, including Noranda.

Respectfully,

Steve Kidwell
VP Regulatory Affairs
AmerenUE
314-554-2943
skidwell@ameren.com

Noranda Aluminum Holding Corporation Announces Outage

Franklin, Tennessee – January 29, 2009 - As a result of the major winter storm in Southeastern Missouri on January 28, 2009, Noranda's New Madrid, Missouri smelter facility experienced a power outage. The interruption was managed safely with no on-site incidents recorded. The outage affects approximately 75% of New Madrid's plant capacity. Based on preliminary information and management's initial assessment, restoring full capacity may take up to 12 months, with partial capacity phased in during the 12 month period. At this time, the cost of the outage is unknown. Over the next several weeks, we will be assessing the impact on our operations. We will be contacting customers as further information becomes available.

Forward-looking Statements

This press release contains "forward-looking statements" which involve risks and uncertainties. You can identify forward-looking statements because they contain words such as "believes," "expects," "may," "should," "seeks," "approximately," "intends," "plans," "estimates," or "anticipates" or similar expressions that relate to our strategy, plans or intentions. All statements we make relating to our estimated and projected earnings, margins, costs, expenditures, cash flows, growth rates and financial results or to our expectations regarding future industry trends are forward-looking statements. Readers are cautioned not to place undue reliance on forward-looking statements, which speak only as of the date on which they are made and which reflect management's current estimates, projections, expectations or beliefs and which are subject to risks and uncertainties that may cause actual results to differ materially. We undertake no obligation to publicly update or revise any forward-looking statement as a result of new information, future events or otherwise, except as otherwise required by law.

Noranda's actual results or performance may differ materially from those suggested, expressed or implied by forward-looking statements due to a wide range of factors including, but not limited to, the general business environment and fluctuating commodity prices. For a discussion of additional risks and uncertainties that may affect the future results of Noranda, please see "Cautionary Statement Concerning Forward-Looking Statements," "Risk Factors" and "Management's Discussion and Analysis of Financial Condition and Results of Operations" in Noranda's Registration Statement on Form S-1, as amended, filed on July 17, 2008, and "Management's Discussion and Analysis of Financial Condition and Results of Operations" in Noranda's Quarterly Reports on Form 10-Q and other items throughout the Forms 10-Q and Noranda's 2008 Current Reports on Form 8-K.

About the Company

Noranda Aluminum Holding Corporation is a leading North American integrated producer of value-added primary aluminum products, as well as high quality rolled aluminum coils. The company has two businesses. The primary metals business, or upstream, produced approximately 261,000 metric tons of primary aluminum in 2008. The Rolled Products facilities, or downstream business, represent one of the largest foil producers in North America and a major producer of light gauge sheet products. Noranda Aluminum Holding Corporation is a private company owned by affiliates of Apollo Management, L.P.

Contact:
Kyle Lorentzen
Chief Financial Officer
(615) 771-5748

Kyle.Lorentzen@noralinc.com

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, DC 20549

FORM 8-K

CURRENT REPORT
Pursuant to Section 13 or 15(d) of the
Securities Exchange Act of 1934

Date of Report (Date of earliest reported event): January 29, 2009

NORANDA ALUMINUM HOLDING CORPORATION

(Exact Name of Registrant as Specified in Its Charter)

Delaware	**333-148977**	**20-8908550**
(State or Other Jurisdiction of Incorporation)	(Commission File Number)	(IRS Employer Identification Number)

801 Crescent Centre Drive, Suite 600, Franklin, Tennessee 37067
(Address of Principal Executive Offices) (Zip Code)

Registrant's telephone number, including area code: (615) 771-5700

Check the appropriate box below if the Form 8-K filing is intended to simultaneously satisfy the filing obligation of the registrant under any of the following provisions:

- ❑ Written communications pursuant to Rule 425 under the Securities Act (17 CFR 230.425)
- ❑ Soliciting material pursuant to Rule 14a-12 under the Exchange Act (17 CFR 240.14a-12)
- ❑ Pre-commencement communications pursuant to Rule 14d-2(b) under the Exchange Act (17 CFR 240.14d-2(b))
- ❑ Pre-commencement communications pursuant to Rule 13e-4(c) under the Exchange Act (17 CFR 240.13e-4(c))

Item 8.01 Other Events.

On January 29, 2009, Noranda Aluminum Holding Corporation ("Noranda") issued a press release announcing that the major winter storm in Southeastern Missouri on January 28, 2009 caused a power outage at Noranda's New Madrid, Missouri smelter facility.

A copy of the press release is being filed as Exhibit 99.1 hereto and is incorporated by reference in its entirety.

Item 9.01. Financial Statements and Exhibits

Exhibit Number	Description
99.1	Press release dated January 29, 2009

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the undersigned hereunto duly authorized.

NORANDA ALUMINUM HOLDING CORPORATION

Date: January 29, 2009

By: /s/Kyle D. Lorentzen
Kyle D. Lorentzen
Chief Financial Officer

EXHIBIT INDEX

Exhibit Number	Description
99.1	Press release dated January 29, 2009

Media Releases

AmerenUE Is Prepared for Severe Winter Weather, Offers Tips to Help Customers when Storms Occur

Jan 26, 2009

AmerenUE is prepared for severe winter conditions forecast for tonight particularly in areas of south and southwestern Missouri.

The area weather forecast includes the possibility of freezing rain, snow and sleet south and southwest of Metropolitan St. Louis. For UE's 112,408 Southeast Missouri customers, that may mean an accumulation of ice.

UE has moved materials and crews into the area and is making logistical arrangements to accommodate those crews. In addition, one of the company's six storm trailers is permanently based in Cape Girardeau and two additional trailers and a mobile command center have been dispatched to the area. The 55-foot storm trailers are stocked with about $100,000 worth of materials commonly needed to repair equipment damaged by storms. When a severe storm strikes, these trailers are dispatched to a central location close to the damage so crews can quickly obtain essential materials.

UE urges customers to ready themselves for the possibility of storm-related power outages throughout the winter.

Senior Vice President for UE Energy Delivery Richard Mark reminds everyone to stay away from downed power lines and always call UE at 1-800-552-7583 if downed lines are spotted. He warns that during icy weather conditions, going outside in the dark means that a person could come into contact with a downed power line that could still be energized and dangerous but not visible. In addition, he urges everyone to stay away from brush, shrubs and downed trees that may hide downed lines.

When severe storms cause power outages, UE's first priority is to correct potentially life-threatening situations, such as downed power lines or hospitals without power. The company then implements power restoration plans focused on restoring power for the greatest number of customers in the shortest length of time.

When there is a threat of severe weather, UE's key steps include:

- Constantly monitoring weather conditions, watching for any changes that may affect service.
- Placing key UE staff on alert.
- Determining if and where to stage field personnel in preparation for storm restoration work. Decisions on staging are based on evolving weather conditions.
- Dispatching storm trailers and activating UE's Emergency Operations Center.

Customer Safety Tips

The measures customers should take to prepare for a power outage or loss of natural gas service are similar to those needed to prepare for any emergency situation.

- Because most major outages are caused by severe weather, begin by developing shelter plans for

severe storm conditions.

• If any member of your family has a medical condition, plan and make arrangements to have that person's special needs met in the event electricity is not available for an extended period of time during a storm.

• Assemble a "storm kit" and store it in a secure, centrally located part of your house. Make sure all family members know where to find that kit. It should contain:

• Emergency telephone numbers; flashlights and fresh batteries (avoid using candles, lanterns or oil lamps due to the fire risk); extra garage and house keys; a battery-powered radio; a battery-powered or wind-up alarm clock; a supply of bottled water (one gallon per person per day); non-perishable foods that don't require heating; blankets, bedding or sleeping bags; a first-aid kit and medications; a hand-operated can opener; special items for infants or family members with special needs; hand tools, such as a screwdriver, scissors and duct tape; household items like plastic utensils, paper plates, waterproof matches and household bleach; identification and copies of important family documents.

• If your electric service is interrupted, be sure to unplug or protect sensitive computer and electronic equipment with a high-quality surge protector.

• When severe weather is predicted, make certain your cell phone is fully charged. Also, remember that cordless land line telephones will not function in the event of a power outage.

• If your power goes out, contact a neighbor to see if you are the only one without power. If you are the only one without service, check your panel box for a tripped circuit breaker or blown fuse. If any breakers are in the "off" position or if a fuse is blown, you should investigate the problem. If you are still without power, or if others in your neighborhood are experiencing a power outage, call your UE at any time, 24 hours a day, seven days a week -- and always call as soon as possible to report a downed line or natural gas odor!

Customers can access information about electricity service outages on the Ameren Web site (www.ameren.com).

• Go to the "Storm Center" in the left-hand menu and select "Outage Information." Then select "Missouri Outage Information." By selecting the "Outage Map," you can immediately see the areas that are affected by outages and the number of customers without power in the affected areas. Outages are listed by zip code.

• Select "County Outages" to view the number of outages in each county.

• Select "My Electric Outage" to learn more about the outage affecting you. You can plug in your phone number and if it is on file, you will find out your outage status. With this service, you often can determine the outage cause and estimated restoration time.

• "Power Out? Call Us" provides complete contact information in the event of an outage. Review and print out this information before a storm occurs. "Storms and Emergencies" provides valuable customer information in dealing with severe storms. "Outage Restoration Trend" shows a graph to help customers understand the progress being made to restore power. "Emergency Preparedness" provides a link to Ready America. Here customers will learn how to assemble a storm emergency kit, how to create an emergency plan and how to stay informed.

With residential electric retail rates that are more than 40 percent below the national average, UE provides electricity and natural gas to 1.2 million customers in Missouri. UE's parent, Ameren Corporation, through its affiliates, serves 2.4 million electric and nearly 1 million natural gas customers across 64,000 square miles of Missouri and Illinois.

# # #

CONTACT: Media Hotline, 314.554.2182