

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

Noranda Aluminum, Inc., et al., )  
 Complainants v. Union Electric Company, ) File No. EC-2014-0223  
 d/b/a Ameren Missouri, Respondent. )

**MOTION FOR LEAVE TO INTERVENE OUT OF TIME**

**COMES NOW** the Missouri Retailers Association (MRA), pursuant to 4 CSR 240-2.075(10), and moves the Commission for leave to file its Application to Intervene four days out of time in the above-captioned matter. In support of its Motion, MRA states:

1. By its Order of February 13, 2014, set an intervention deadline of March 7, 2014, and a deadline for response of March 17, 2014.
2. By inadvertence of counsel, MRA's Application to Intervene was drafted but not timely filed. MRA's counsel has been involved with discussions with other parties, and potential intervenors in both this case and in Case No. EC0-2014-0224. MRA had intervened in EC-2014-0224, and counsel overlooked the filing date in this file.
3. No party, Noranda Aluminum, Inc., Ameren Missouri, the Office of Public Counsel, the Commission, or Commission Staff, will be prejudiced by the Commission's granting leave to file MRA's Application to Intervene out of time, nor by the Commission's consideration of that Application.
4. The time for objections to the Application to Intervene has not yet run, and any party that wishes to object to MRA's intervention has the opportunity to do so.
5. All parties have known of MRA's interest in the above-captioned matter by virtue of its, admittedly premature, joint filing in this file made on February 21, 2014.
6. MRA's counsel has received service copies of other applicants' pleadings in the case.

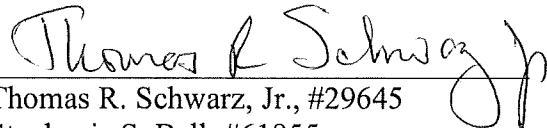
7. MRA's Application to Intervene accompanies this Motion.

8. In the alternative, should the Commission deny MRA's Application to Intervene out of time, MRA respectfully asks the Commission to permit it to participate in the case as amicus curiae pursuant to 4 CSR 240-2.075(11).

**WHEREFORE**, MRA asks the Commission for leave to file its Application to Intervene out of time, or in the alternative, to grant it Amicus Curiae status.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

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**CERTIFICATE OF SERVICE**

I hereby certify that true and accurate copies of the above pleading were served by electronic mail this 12<sup>th</sup> day of March, 2014, on the following:

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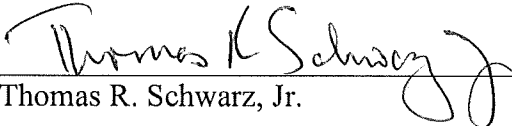
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