

**FIRST SET OF DATA REQUESTS OF MEUA  
TO NORANDA**

MEUA-1.1: Please identify all consultants (including Don Johnstone) retained by Noranda, either individually or through MIEC, for purposes of this case. Include all consultants whether they filed testimony or not in this case.

MEUA-1.2: For all consultants identified in Data Request 1.1, please identify the subject matter for which they were retained.

MEUA-1.3: Please provide a copy of all documents, notes, studies, analyses, or emails generated by the consultants identified in Data Request 1.1.

MEUA-1.4: Please provide a copy of all class cost of service analyses prepared for Noranda whether generated internally or by a consultant identified in Data Request 1.1.

MEUA-1.5: Please provide all class cost of service analyses which support the \$27 / MWH rate discussed on page 6 of Mr. Smith's Direct Testimony.

MEUA-1.6: Please quantify the amount of rate decrease / increase necessary to move Noranda to a \$27 / MWH rate.

MEUA-1.7: Please identify the number of jobs, over and above the 900 employees identified in Mr. Smith's testimony, that will be created if Noranda receives a rate of \$27 / MWH.

MEUA-1.8: Please identify the incremental amount of payroll or property taxes that will be generated if Noranda receives a rate of \$27 / MWH.

MEUA-1.9: Please provide all analyses which support Noranda's claim that it needs a rate "in the range of \$27 / MWH to compete with other aluminum smelters."

MEUA-1.10: Please define the magnitude of the range referred to in Mr. Smith's testimony when he claims that "Noranda needs a rate in the range of \$27 / MWH."

MEUA-1.11: Please identify the return on equity assumed in the analyses supporting a rate of \$27 / MWH.

MEUA-1.12: What revenues would be generated by the LTS class in the event that Noranda is given a rate of \$27 / MWH.

MEUA-1.13: Identify the amount of annual salary and other compensation paid to Mr. Smith and Mr. Skoda in the analyses supporting a rate of \$27 /MWH.

MEUA-1.14: At his residence, does Mr. Earnheart receive electric service from AmerenUE?

MEUA-1.15: In Exhibit HWF-1 of Mr. Fayne's Direct Testimony, he identifies 12 aluminum smelters in the United States. Please identify the state where each smelter is located and the electric service provider for each smelter.

MEUA-1.16: Please provide a copy of each tariff or contract supporting the rate contained in Exhibit HWF-1.

MEUA-1.17: Please identify each smelter in Exhibit HWF-1 that is charged an electric rate that is indexed to the LME.

MEUA-1.18: For each rate on Exhibit HWF-1 that is indexed to the LME, please identify the LME rate that underlies the cost of electricity rate provided in HWF-1. Also please provide on which the LME rate was taken.

MEUA-1.19: For each smelter in Exhibit HWF-1 that has an electric rate tied to the LME index, please identify whether the electric rate is tied to the rate for: (1) aluminum or (2) aluminum alloy.

MEUA-1.20: During the January 14 prehearing conference, Mr. Smith indicated that 5 aluminum smelters had closed in the last 2 years. Please identify each of the 5 smelters that were closed, as well as the state in which the smelter was located and the electric service provider for the smelter.

MEUA-1.21: For each of the smelters identified in MEUA 1.20, please identify the cost of electricity for that smelter.

MEUA-1.22: Please provide an update on the status of Noranda's initial public offering.

MEUA-1.23: Please identify the number of shares in Noranda held by Mr. Smith as well as the tax basis for those shares.

MEUA-1.24: Please identify the number of shares in Noranda held by Mr. Skoda as well as the tax basis for those shares.

MEUA-1.25: Please identify the extent of any options held by Mr. Smith to purchased shares of Noranda. Please identify the strike price of all options held by Mr. Smith.

MEUA-1.26: Please identify the extent of any options held by Mr. Skoda to purchased shares of Noranda. Please identify the strike price of all options held by Mr. Skoda.

MEUA-1.27: In the Form S-1 filed by Noranda on January 14, 2010, Noranda claims that "our bauxite mining operation in Jamaica . . . provides a secure source of bauxite to our wholly owned alumina refinery. . . Our alumina refinery provides a strategic supply of alumina to our New Madrid smelter at costs below recent spot market prices for

alumina.” Similar to the electric rate comparison contained in Exhibit HWF-1, please provide a comparison between Noranda and its competition for bauxite.

MEUA-1.28: Please provide a historical comparison for the past 3 years between the spot market price for alumina and the cost of alumina provided to the New Madrid smelter.

MEUA-1.29: In the Form S-1 filed by Noranda on January 14, 2010, Noranda claims “we have a long-term secure power contract at New Madrid that extends through 2020. This contract gives Noranda an advantage over aluminum smelters facing frequent power shortages or disruptions.” Please identify, on a per-smelter basis, the number of instances in which each competing smelter has experienced a power shortage or disruption.

MEUA-1.30: Please provide a historical comparison for the past 3 years between the cost of transportation of bauxite for Noranda to the cost for competing refinery / smelters.

MEUA-1.31: In its Form S-1 filed by Noranda on January 14, 2010, Noranda claims to have “an advantageous geographic location” for its downstream businesses. Moreover, Noranda claims that the proximity of Gramercy to St. Ann and New Madrid to Gramercy provide us with an attractive freight cost advantage.” Please provide a historical comparison for the past 3 years between the freight costs of Noranda and the competing smelters identified in HWF-1.

MEUA-1.32: Please provide a comparison of the cost of electricity in the event the LME price for aluminum was to increase by **25%** over the LME price contained in HWF-1.

MEUA-1.32: Please provide a comparison of the cost of electricity in the event the LME price for aluminum was to increase by **50%** over the LME price contained in HWF-1.

MEUA-1.32: Please provide a comparison of the cost of electricity in the event the LME price for aluminum was to increase by **75%** over the LME price contained in HWF-1.

MEUA-1.32: Please provide a comparison of the cost of electricity in the event the LME price for aluminum was to increase by **100%** over the LME price contained in HWF-1.

MEUA-1.33: Assuming all other factors remained equal, please identify how the initial public offering purchase price would be affected by a reduction in Noranda’s cost of electricity from current rates to \$27 / MWH.

MEUA-1.34: Please provide citations to all SEC filings in which Noranda warns that an increase in electric rates threaten the “long-term viability” of Noranda or the New Madrid smelter.

MEUA-1.35: For the past three years, please identify all competing smelters which has received a reduction in electric rates that was not a result of indexing to LME.

MEUA-1.36: In its Form S-1 filed by Noranda on January 14, 2010, Noranda states that it believes the “medium and long-term supply and demand outlook for aluminum supports sustainable, higher LME prices.” Please define the time period envisioned by: (1) medium and (2) long term.

MEUA-1.37: Please provide any forecasts, done by Noranda or other entities, as to projected LME prices for: (1) the medium term defined in MEUA 1.36 and (2) the long term defined in MEUA-1.36.

MEUA-1.38: In its Form S-1 filed by Noranda on January 14, 2010, Noranda forecasts a “long-term world-wide increase in the cost of power.” Again, please define the time period envisioned by the phrase “long-term” as well as the projected cost of power at the end of that “long-term” period.

MEUA-1.39: Please identify the number of shareholders of Noranda or any of its parent holding companies that are residents of Missouri.

MEUA-1.40: Does Noranda believe that electric rates should be based on cost?

MEUA-1.41: Under what circumstances would Noranda agree that a below-cost rate is appropriate for a particular class or customer?

MEUA-1.42: Please identify the individual at Noranda that is most knowledgeable to testify on Noranda’s position on class cost of service / rate design.

MEUA-1.43: Please identify all cases (jurisdiction and case number) in which Noranda has advocated for a below cost rate for a particular class or customer.

MEUA-1.44: Provide provide all documents, email or notes within Noranda’s control or possession which discuss the arrangement reached between MIEC, its individual members and Noranda regarding Noranda’s inclusion in MIEC.

MEUA-1.45: On a revenue neutral basis, hat is Noranda’s position regarding the appropriate amount of revenues to be collected from the LTS rate schedule?

MEUA-1.46: Please identify the individual at Noranda that is most knowledgeable regarding any arrangements made between MIEC, its individual members and Noranda regarding the inclusion of Noranda in MIEC.

MEUA-1.47: Please identify all jurisdictions in which Noranda receives electric service. Please identify the service provider in each jurisdiction from which Noranda takes service.

MEUA-1.48: Please provide all documents, emails or notes within Noranda’s control or possession which discuss the positions to be taken in this case by MIEC or Noranda.

MEUA-1.49: Please identify, on a county by county basis, the number of Noranda employees in each of the Missouri counties.

MEUA-1.50: Please identify, on a county by county basis, the amount of property taxes paid in each of the Missouri counties.

MEUA-1.51: Please provide a copy of all CRU documents relied upon by Mr. Fayne in creating Exhibit HWF-1.

MEUA-1.52: Please provide a discussion of Mr. Fayne's past experience relative to the rates charged to an aluminum smelter.

MEUA-1.53: Please identify the budgeted amount of compensation for Mr. Fayne's appearance in this case.

MEUA-1.54: Please identify the amount of compensation paid to Mr. Fayne through January 6, 2010 (the date of filing of direct testimony).

MEUA-1.55: Please identify the budgeted amount of compensation for Mr. Coomes' appearance in this case.

MEUA-1.56: Please identify the amount of compensation paid to Mr. Coomes through January 6, 2010 (the date of filing of direct testimony).

MEUA-1.57: Please identify the budgeted amount of compensation for Mr. Yatchew's appearance in this case.

MEUA-1.58: Please identify the amount of compensation paid to Mr. Yatchew through January 6, 2010 (the date of filing of direct testimony).

MEUA-1.59: Please identify the budgeted amount of compensation for Mr. Haslag's appearance in this case.

MEUA-1.60: Please identify the amount of compensation paid to Mr. Haslag through January 6, 2010 (the date of filing of direct testimony).

MEUA-1.61: Please identify the amount of additional compensation paid to Mr. Gregston associated with his participation in this case.

MEUA-1.62: Please identify the amount of additional compensation paid to Mr. Earnheart associated with his participation in this case.

MEUA-1.63: Please identify the amount of any bonus compensation due to either Mr. Smith or Mr. Skoda associated with the outcome of this case.