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February 12, 2010

David L. Woodsmall
Finnegan, Conrad & Peterson L.C.
1209 Penntower Office Center
3100 Broadway
Kansas City, MO 64111

Re: Additional Responses to MEUA's First Data Requests

Dear David:

This document provides Noranda's Additional Responses to the Midwest Energy Users' Association's ("MEUA") First Data Requests dated January 28, 2010.

GENERAL OBJECTIONS

1. Noranda objects to each data request to the extent that the response sought is overly broad, unduly burdensome, oppressive, and compliance with the request would be cost-prohibitive, impracticable, and/or impossible.

2. Noranda objects to each data request to the extent that the request seeks information that is neither relevant, material nor reasonably calculated to lead to the discovery of admissible evidence in case number ER-2010-0036.

3. Noranda objects to each data request to the extent that the request seeks information and documents protected from discovery by the attorney-client privilege, the attorney work-product doctrine, the common interest privilege, or any other privilege or doctrine. Nothing contained in these Objections is intended as a waiver of any applicable privilege or doctrine.

4. Noranda objects to each data request to the extent the request seeks information that is a trade secret, commercially-sensitive, or confidential financial information, the release of which may be injurious to Noranda.

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5. Noranda objects to each request to the extent the request is vague, ambiguous, confusing, or fails to describe the information sought with sufficient clarity or specificity to enable Noranda to provide responsive answers.

6. Noranda objects to each request to the extent that the request calls for information or documents already in the MEUA's possession or which is readily obtainable from another source that is equally available to MEUA.

7. Noranda objects to each request to the extent that the numerous requests are not truly designed for legitimate discovery but are rather intended for an improper, ulterior purpose. Accordingly, Noranda objects to each data request to the extent that the request causes Noranda undue harassment.

8. Noranda objects to each request that seeks information relating to the \$27 / MWH rate discussed on page 6 of Mr. Smith's Direct Testimony. Such requests seek information that is neither relevant, material nor reasonably calculated to lead to the discovery of admissible evidence in light of Mr. Smith's Supplemental Direct Testimony of February 11, 2010.

8. These General Objections are applicable to, and incorporated in, each of Noranda's Objections and Responses below as if specifically set forth therein. The failure to repeat, renew or reassert any of the General Objections or the assertion of other objections in no way implies a failure to assert each and every General Objection in any way.

SPECIFIC OBJECTIONS AND RESPONSES

MEUA Data Request-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.

Objection and Response:

Without waiving its objections, Noranda states that it has adjusted its request to ask for a rate consistent with Maurice Brubaker's cost of service study filed on behalf of the Missouri Industrial Energy Consumers. As such, this request seeks information that is neither relevant, material, nor reasonably calculated to lead to the discovery of admissible evidence in this action.

MEUA Data Request-1.6:

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

Objection and Response:

Without waiving its objections, Noranda states that it has adjusted its request to ask for a rate consistent with Maurice Brubaker's cost of service study filed on behalf of the Missouri Industrial Energy Consumers. As such, this request seeks information that is neither relevant, material, nor reasonably calculated to lead to the discovery of admissible evidence in this action.

MEUA Data Request-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.

Objection and Response:

Without waiving its objections, Noranda states that it has adjusted its request to ask for a rate consistent with Maurice Brubaker's cost of service study filed on behalf of the Missouri Industrial Energy Consumers. As such, this request seeks information that is neither relevant, material, nor reasonably calculated to lead to the discovery of admissible evidence in this action.

MEUA Data Request-1.8:

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

Objection and Response:

Without waiving its objections, Noranda states that it has adjusted its request to ask for a rate consistent with Maurice Brubaker's cost of service study filed on behalf of the Missouri Industrial Energy Consumers. As such, this request seeks information that is neither relevant, material, nor reasonably calculated to lead to the discovery of admissible evidence in this action.

MEUA Data Request-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."

Objection and Response:

Without waiving its objections, Noranda states that it has adjusted its request to ask for a rate consistent with Maurice Brubaker's cost of service study filed on behalf of the Missouri Industrial Energy Consumers. As such, this request seeks information that is neither relevant, material, nor reasonably calculated to lead to the discovery of admissible evidence in this action.

MEUA Data Request-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."

Objection and Response:

Without waiving its objections, Noranda states that it has adjusted its request to ask for a rate consistent with Maurice Brubaker's cost of service study filed on behalf of the Missouri Industrial Energy Consumers. As such, this request seeks information that is neither relevant, material, nor reasonably calculated to lead to the discovery of admissible evidence in this action.

MEUA Data Request-1.11:

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

Objection and Response:

Without waiving its objections, Noranda states that it has adjusted its request to ask for a rate consistent with Maurice Brubaker's cost of service study filed on behalf of the Missouri Industrial Energy Consumers. As such, this request seeks information that is neither relevant, material, nor reasonably calculated to lead to the discovery of admissible evidence in this action.

MEUA Data Request-1.12:

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

Objection and Response:

Without waiving its objections, Noranda states that it has adjusted its request to ask for a rate consistent with Maurice Brubaker's cost of service study filed on behalf of the Missouri Industrial Energy Consumers. As such, this request seeks information that is neither relevant, material, nor reasonably calculated to lead to the discovery of admissible evidence in this action.

MEUA Data Request-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.

Objection and Response:

In addition to the General Objections, Noranda objects to the extent that the term “envisioned” is overly broad and not adequately tailored to produce useful information. Without waiving its objections, Noranda states that “medium term” means 2-5 years and “long term” means 5-30 years.

MEUA Data Request-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 Data Request 1.36 and (2) the long term defined in MEUA Data Request-1.36.

Objection and Response:

In addition to the General Objections, Noranda objects that the request is speculative. It also objects that the term “other entities” is vague, ambiguous and overly broad. Without waiving any objections, Noranda states that it does not forecast aluminum prices. Noranda also states that to its knowledge, experts in the aluminum field typically forecast aluminum prices 2-5 years in the future. Noranda bases its belief that prices may rise in the future, particularly compared to the 2009 average, by reviewing expert forecasts and the LME Forward Curve. Noranda reviews forecasted LME prices from CRU, and LME Forward Curve data from Bloomberg.

MEUA Data Request-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.

Objection and Response:

In addition to the General Objections, Noranda objects to the extent that the term “envisioned” is overly broad and not adequately tailored to produce useful information. Without waiving any objections, Noranda states that it does not “forecast” power prices. Noranda bases its belief that the cost of power will increase world-wide on the opinions of experts in the field.

MEUA Data Request-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.

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Objection and Response:

Without waiving its objections, Noranda states that none of its employees constitute experts on the issue of class cost of service/rate design.

Noranda reserves the right to revise, correct, add to, or clarify any of the Objections and Responses set forth above.

Sincerely,

A handwritten signature in black ink that reads "Diana Vuylsteke" followed by a stylized flourish and the letters "BER".

Diana Vuylsteke
Attorney for Noranda