

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

Noranda Aluminum, Inc., et al.,)	
)	
Complainants,)	
v.)	
)	Case No. EC-2014-0224
Union Electric Company,)	
d/b/a Ameren Missouri,)	
)	
Respondent.)	

MOTION TO INTERVENE

COMES NOW Continental Cement Company, L.L.C. (hereinafter sometimes “Continental Cement”), pursuant to 4 CSR 240-2.075 of the Rules of Practice and Procedure, and for its Motion to Intervene respectfully states:

1. Continental Cement Company, L.L.C. is an active Delaware limited liability company, registered to do business in Missouri.
2. Correspondence, communications, orders and the decision in this matter should be addressed to:

Scott Conroy
Vice President, Engineering & Projects
Continental Cement Company, L.L.C.
16100 Swingley Ridge Road, Suite 230
Chesterfield, MO 63017
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sconroy@continentalcement.com

Mark W. Comley
NEWMAN, COMLEY & RUTH P.C.
P.O. Box 537
Jefferson City, MO 65102-0537
Telephone: 573-634-2266
Facsimile: 573-636-3306

3. This case arose when Noranda Aluminum, Inc. and 37 other individual customers of Ameren Missouri filed a complaint with the Missouri Public Service Commission against Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri"), asking that Ameren Missouri redesign its rate structure to reduce rates for Noranda Aluminum, Inc.. On February 13, 2014 the Commission issued a Notice of Complaint, Order Establishing Time to Respond and Order Establishing Time to Apply to Intervene, directing that interested parties wishing to intervene must do so on or before March 7, 2014. This application is therefore timely.

4. Continental Cement is itself a major consumer of energy supplied by Ameren Missouri. Continental Cement has an interest in this proceeding that is different from that of the general public which may be adversely affected by a final order arising from the outcome of this case.

5. Continental Cement asserts that its participation in this case will assist the Commission in its understanding and disposition of the issues and its intervention will serve the public interest.

6. Continental Cement has not yet adopted a position on the relief requested by Complainants in this case.

WHEREFORE, for the foregoing reasons, Continental Cement Company, L.L.C. respectfully requests that the Commission grant its Application to Intervene in this matter, and thereby entitle Continental Cement to have notice and to appear at the taking of testimony, to produce and cross-examine witnesses and to be heard on the arguments, and in all other respects fully participate in this proceeding.

Respectfully submitted,

/s/ Mark W. Comley

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Attorneys for Continental Cement Company, L.L.C.

Certificate of Service

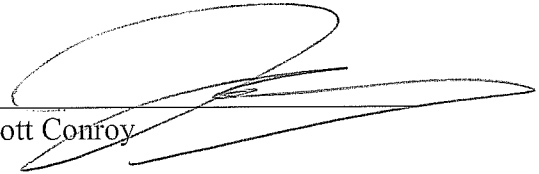
I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 7th day of March, 2014, to General Counsel's Office at staffcounservice@psc.mo.gov; and Office of Public Counsel at opcservice@ded.mo.gov.

/s/ Mark W. Comley

VERIFICATION

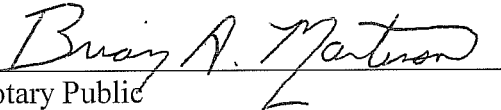
STATE OF MISSOURI)
) ss.
COUNTY OF Ralls)

I, Scott Conroy, being first duly sworn upon oath, do hereby depose and state that I am Vice-President, Engineering & Projects for Continental Cement Company, L.L.C. and am authorized to execute this verification; that I have read the above and foregoing application to intervene and know the contents thereof; that the contents are true and correct to the best of my knowledge, information and belief.



Scott Conroy

Subscribed and sworn to before me, a Notary Public, this 7th day of March, 2014.



Notary Public

Brian A. Martinson
Notary Public - Notary Seal
State of Missouri
County of Ralls
Commission #12332966
My Commission Expires April 26, 2016

