

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

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

**MOTION TO INTERVENE OF  
WAL-MART STORES EAST, LP, AND SAM'S EAST, INC.**

Pursuant to 4 CSR 240-2.075(1), Wal-Mart Stores East, LP, and Sam's East, Inc., (collectively "Walmart") submit this Motion To Intervene ("Motion") to the Public Service Commission of the State of Missouri (the "Commission"). In support of this Motion Walmart states as follows:

1. Wal-Mart Stores East, LP, is a Delaware limited partnership authorized to do business in the State of Missouri. Sam's East, Inc., is an Arkansas corporation also authorized to do business in the State of Missouri. The business address of both entities is: Sam M. Walton Development Complex, 2001 SE 10th Street, Bentonville, AR 72716-0550.

2. Walmart is a large retail customer of the Union Electric Company d/b/a Ameren Missouri ("Ameren"), owning and operating over 73 retail stores and related facilities in Ameren's Missouri service territory. Collectively, these facilities consume over 190 million kWh of electricity on an annual basis.

3. On February 12, 2014, Noranda Aluminum, Inc. ("Noranda") and 37 individual customers of Ameren filed their Complaint and request for expedited review and relief with the Commission. The Complaint alleges that Ameren is

currently overearning and requests that Ameren's current electric rates be revised to just and reasonable levels, consistent with its current costs of service and revenues.

4. The relief being requested in this proceeding, if adopted, could result in significant changes to Walmart's cost of electricity, directly and substantially affecting its business and operations in the State of Missouri. Accordingly, Walmart has a direct interest in these proceedings.

5. Further, as a large commercial customer, Walmart's interests differ from those of other customer groups represented in this proceeding. Given the unique configuration of its facilities, Walmart's interests cannot be adequately represented by any existing or future participant in this proceeding.

6. Allowing Walmart to intervene in this proceeding will serve the public interest by ensuring that the Commission is apprised of the interests of a large commercial electric customer. Further, because Walmart operates in many different states, it has substantial and unique insights gained in various states and markets regarding issues in rate setting proceedings.

7. The following persons should be included on the service list in this proceeding, and all communications concerning this matter should be addressed to:

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8. Walmart continues to review the Complaint. For purposes of 4 CSR 240-2.075(2)(F), Walmart is currently developing the position it will take in this matter.

WHEREFORE, Wal-Mart Stores East, LP, and Sam's East, Inc., respectfully request that the Commission grant them intervenor status as full parties of record and allow them to fully participate in this proceeding including, without limitation, filing and presenting comments and/or testimony, cross-examination of witnesses, participation in all formal and informal conferences and hearings, and filings of briefs and any other pleadings, to the extent they deem necessary for their full participation herein.

Dated this 7<sup>th</sup> day of March, 2014.

Respectfully submitted,

By 

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- and -

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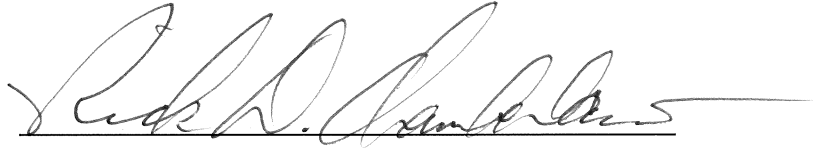
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ATTORNEYS FOR WAL-MART STORES  
EAST, LP, AND SAM'S EAST, INC.

**CERTIFICATE OF SERVICE**

The undersigned certifies that on March 7, 2014, a true and correct copy of the foregoing Motion to Intervene was served by U.S. mail, postage prepaid, or by electronic mail addressed to all parties by their attorneys of record as provided by the Secretary of the Commission.



A handwritten signature in cursive script, appearing to read 'Marcos A. Barbosa', is written over a horizontal line.