

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

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

**MISSOURI RETAILERS ASSOCIATION’S COMMENTS ON
UNITED FOR MISSOURI’S REPLY TO OBJECTION TO MOTION TO INTERVENE**

COMES NOW Missouri Retailers Association (MRA), by and through counsel, and provides the following comments on United for Missouri’s Reply to Objection to Motion to Intervene as follows:

1. United for Missouri (UFM) asserts its “interest is not similar but comparable to that of the Missouri Retailers Association” (UFM Reply, p. 8). That assertion, with which the MRA does not agree, prompted these comments.

2. Section 386.610, RSMo 2000, provides: “The provisions of this chapter shall be liberally construed with a view to the public welfare, efficient facilities and substantial justice between patrons and public utilities.”

3. The purpose of this case is focused on a concrete objective: establish rates that provide substantial justice between patrons and Ameren Missouri. The evidence, focusing on that narrow question, will be voluminous.

4. This case does not address the “freedom of private business to organize and operate a profit in a competitive system without interference by government beyond regulation necessary to protect public interest and keep the national economy in balance.” Nor does any

issue involve “removing and preventing unnecessary barriers to entrepreneurship and opportunity by sparking citizen involvement in the regulatory process early on in order to reduce red tape.” Indeed, those issues are addressed in rulemakings, which address matters of general policy and do not involve the determination of private rights after a hearing. Compare, Section 536.010(4) – Defining Contested Case with Section 536.010(6) – Defining Rule.

5. The issues for Commission decision in this case do not implicate the interests that UFM seeks to promote.

WHEREFORE, the MRA asks the Commission to deny UFM’s Motion to Intervene Out of Time.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that true and accurate copies of the above pleading have been e-mailed this 7th day of May, 2014, to the following parties of record:

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