

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

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

**UNITED FOR MISSOURI'S  
PETITION FOR LEAVE TO FILE BRIEF AS *AMICUS CURIAE***

COMES NOW United For Missouri, Inc. (“UFM”), by and through its counsel, pursuant to Commission Rule 4 CSR 240-2.075 (11), and respectfully petitions the Missouri Public Service Commission (“Commission”) for leave to appear and file a brief as an *amicus curiae*. In support of its Petition, UFM states as follows:

1. UFM is a nonprofit mutual benefit corporation organized under the laws of the state of Missouri. Formed in July 2010, UFM has over 76,000 members and is committed to serving its members and the public by educating the public about and supporting economic policies in the state that will achieve growth, opportunity and prosperity. Part of that economic policy are energy policies that support the development of utility services that are reliable and abundant at just, reasonable and non-discriminatory rates. UFM seeks to help state legislators, state-wide elected officials, state agencies, the media and individual citizens understand why policies that promote the American free enterprise system are the best method to ensuring

prosperity for all Missourians. UFM has many members that are served by Ameren Missouri, as residential, commercial and/or industrial customers.

2. On February 12, 2014, Noranda Aluminum, Inc. (“Noranda”) and 37 other individual customers of Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri”) filed a complaint with the Commission against Ameren Missouri. The Complaint alleged that Ameren Missouri has excess earnings, such earnings exceeding its authorized rate of return. In its Complaint, Noranda requested the Commission to “revise Ameren Missouri’s electric rates to just and reasonable electric rates consistent with its cost of service and revenues.”

3. UFM’s interest in this matter relates to how the electric rates for Ameren Missouri’s industrial, commercial and residential customers are set and the effect thereof on achieving a strong economic environment in the state of Missouri. During the course of the hearing in this case, it became apparent that a significant issue in resolving Noranda’s Complaint is the sufficiency of evidence necessary in order to justify a Commission order setting new rates for Ameren Missouri. More particularly, the issue is whether a comprehensive cost of service study is necessary for the Commission to set new rates for Ameren Missouri. This issue is one of basic justice and how justice will be executed in setting electric rates. It is an issue in which UFM is critically interested. UFM’s perspective would provide the Commission with a greater understanding of this issue.

4. Correspondence, communications, orders and the decisions in this matter should be addressed to:

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5. The Commission liberally grants petitions to file *amicus curiae* briefs. In *Staff v. Cass County Tel. Co.*, File No. TC-2005-0357, the Office of Attorney General (“State”) requested intervention after Staff and Cass County Telephone Company had filed a stipulation and agreement resolving all contested issues relating to a Staff complaint. While the Commission denied the intervention request, it suggested the State petition and file as an *amicus curiae*. UFM’s petition herein is of a similar nature.

6. UFM requests Commission’s leave and permission to file its *amicus curiae* brief no later than the date established for the filing of initial briefs in this matter.

WHEREFORE, for the foregoing reasons, United for Missouri respectfully requests the Commission grant its Petition to File a Brief as an *amicus curiae*.

Respectfully submitted,

By: /s/ David C. Linton

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**ATTORNEY FOR UNITED FOR  
MISSOURI, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Application to Intervene was sent to all parties of record in File No. EC-2014-0223 via electronic transmission this 29th day of July, 2014.

/s/ David C. Linton