

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

In the Matter of Noranda Aluminum, Inc.’s	)	
Request for Revisions to Union Electric	)	
Company d/b/a Ameren Missouri’s Large	)	Case No. EC-2014-0224
Transmission Service Tariff to Decrease its	)	
Rate for Electric Service	)	

**COMPLAINANTS’ SUGGESTIONS IN PARTIAL OPPOSITION TO STAFF’S  
MOTION FOR EXTENSION OF TIME TO FILE OPENING AND REPLY BRIEFS**

COME NOW NORANDA ALUMINUM, INC. (“Noranda”) and the individual electric service customers of Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) (“Individual Complainants”), and for their Suggestions in Partial Opposition to Staff’s request for extension to file the Opening and Reply Briefs, state as follows:

1. It has been no secret in this case that Noranda is suffering a liquidity crisis and needs immediate rate relief. Noranda suffers a significant liquidity crisis that if not properly and promptly addressed, threatens imminent closure of the smelter at New Madrid, Missouri. Electricity accounts for approximately one-third of the smelter’s expenses. \*\*

\*\*\* (HC Tr. June 16, 2014, p. 411).

2. In its Complaint, Motion for Expedited Treatment and in its CEO’s testimony and affidavit, Noranda sought relief by August 1. Even adhering to the current schedule, Noranda will be unable to obtain relief by that date. Adding three more days of delay in obtaining that relief only increases the risk that Noranda may have to take actions to reduce its workforce to weather the delay.

3. Complainants appreciate that all counsel, including Staff counsel, the witnesses, the ALJ, and the Commission, all sacrificed in order to provide expedited review and relief in this case. But for the exigent circumstances, Complainants would not oppose Staff's Motion. However, that Motion seeks a five day delay in filing the opening briefs, but more significantly, a three day delay in filing the reply briefs. That delay will undoubtedly delay the issuance of a decision in this case, leading to the prejudice of Noranda mentioned above.

4. If the Commission is inclined to grant an extension of time to file the opening briefs, Complainants urge the Commission to retain the July 14 deadline for filing Reply briefs and deny Staff's Motion in that regard.

WHEREFORE, Complainants pray that the Commission retain the current deadline of July 14 for filing Reply briefs, whether or not it grants Staff's Motion for extension of time to file the Opening briefs.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 1st day of July, to all counsel of record.