

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of an Investigation)
of Union Electric Company d/b/a) EO-2006-0430
AmerenUE)

APPLICATION FOR ORDER ALLOWING INTERVENTION
OF NORANDA ALUMINUM, INC.

Comes now NORANDA ALUMINUM, INC. ("Noranda") and pursuant to 4 C.S.R. 240-2.075 applies to intervene herein and become a party in the above matter. In support thereof, Noranda respectfully states:

1. Noranda is a manufacturing corporation duly authorized to transact business in Missouri, operating an aluminum smelter and associated manufacturing and processing facilities at 391 St. Jude Industrial Park, New Madrid, MO 63869.

2. At its New Madrid smelter, Noranda employs roughly 1,100 employees and consumes electricity in the process of producing aluminum base metal and related products in substantial quantities and at an exceptionally high load factor. Noranda maintains a payroll of roughly \$57 million annually and its business activities provide significant and critically important economic support and stability to a 10-county region in Southeast Missouri. In addition to the payroll and electricity purchases, Noranda purchases some \$22 million of a variety of goods and services largely from regional suppliers.

3. Noranda and its employees also pay substantial local and state taxes that support various operations in the region, including schools, local and regional governments, and public safety operations. Noranda utilizes many Missouri suppliers and purchases substantial goods and services from Missouri businesses. With respect to Missouri, Noranda is an export business, shipping large amounts of product out of state and importing into Missouri substantial revenues from out-of-state customers.

4. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

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with a courtesy copy to:

George Swogger
Manager--Energy Procurement
Noranda Aluminum, Inc.
391 St. Jude Industrial Park
New Madrid, MO 63869

5. Since June 1, 2005, Noranda is supplied with electricity at retail by AmerenUE. That supply is pursuant to tariffs and a contract approved by this Commission in Case No. EA-2005-0180. It is believed that Noranda is the largest retail customer on the AmerenUE system in Missouri.

6. Electricity is the largest cost incurred by Noranda to operate its plant. A safe, reliable, cost-based and adequate long term supply of electric power and energy is critical to Noranda's energy-intensive operations, including its ability to continue competitive and cost-effective operation of its plant. The operational characteristics of an aluminum smelting facility require highly reliable supplies of firm electrical power. Continued operations of that smelter demand electricity at cost-based rates that are not unreasonably expensive because of incorrect allocations of cost and expense through external dispatch agreements or because of. Accordingly appropriate planning of those resources is of critical concern to Noranda.

7. This case was established to investigate certain aspects of AmerenUE's operations that may have impact upon the level of its rates, both in the aggregate and those directly applicable to Noranda. Noranda may be directly affected by the outcome of this case and has a unique, direct and immediate interest in this proceeding that differs from the interest of any other party and from the general public. Therefore, it will aid the Commission and protect the public interest that Noranda be permitted to intervene in this proceeding so as to protect this unique interest.

8. At this early stage Noranda is unable to state its position on issues that may arise in this case. Indeed, one of the stated purposes of this case is to permit other proper

parties to have access to materials that may permit evaluation of the financial status of the utility.

WHEREFORE, Noranda prays: (a) that Noranda be permitted to intervene herein and be made a party hereto with all rights to have notice of and participate in hearings to present evidence, cross-examine witnesses, file briefs and participate in argument, should any be had; and (b) for all other needful and proper relief not inconsistent with the foregoing.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



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ATTORNEYS FOR NORANDA ALUMINUM,
INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by electronic means or by U.S. mail, postage prepaid, addressed to all parties by their attorneys of record as disclosed by the pleadings and orders herein.



Stuart W. Conrad

Dated: May 11, 2006