

**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.)	

**UNITED FOR MISSOURI'S
PETITION FOR LEAVE TO APPEAR AND 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. Noranda Aluminum, Inc. (“Noranda”) and 37 other individual customers of Ameren Missouri filed a complaint against Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri”) on February 12, 2014, regarding the rate Ameren Missouri charged Noranda. On February 13, 2014, the Commission issued a Notice of Complaint, Order Establishing Time to Respond and Order Establishing Time to Apply to Intervene in each case (“Notices”). The Notices established a deadline for motions to intervene of March 7, 2014. During such time, UFM was unaware of the complaint or how it could participate.

3. UFM’s interest in this matter relates to the electric rates for Ameren Missouri’s industrial, commercial and residential customers and the effect thereof on achieving a strong economic environment in the state of Missouri. As is apparent from the public comments in this case, there is a strong public opinion in line with UFM’s interest. UFM brings a broad legal and policy perspective that will assist the Commission in its deliberations.

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

Carl Bearden
Executive Director
United for Missouri
P.O. Box 11466
Springfield, Missouri 65808
carl@unitedformissouri.org
Phone: 888-332-3811

David C. Linton
314 Romaine Spring View
Fenton, MO 63026
jdlinton@reagan.com
Phone: 314-341-5769

5. The Commission liberally grants petitions to appear and 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*.

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 Appear and File a Brief as an *Amicus Curiae*.

Respectfully submitted,

By: /s/ David C. Linton

David C. Linton, #32198
314 Romaine Spring View
Fenton, MO 63026
Telephone: 314-341-5769
Email: jdinton@reagan.com

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-2014-0224 via electronic transmission this 2nd day of June, 2014.

/s/ David C. Linton