

4. Finally, in its May 14, 2010 Prospectus (Appendix 4) filed with the SEC, Noranda provided at least 58 separate references to specific CRU cost data. (See, pages 4, 7, 9, 10, 11, 12, 13, 29, 33, 61, 100, 101, 102, 103, 104, 105 and 115).

5. In each of these cases, the CRU data released by Noranda went well beyond the cost of electricity data that it claims it is allowed to disclose in this case. Clearly, Noranda routinely relies upon and releases CRU data when it suits their position. By the underlying Motion to Compel, MEUA asks that the Commission order Noranda to disclose two other portions of that same study which will likely undermine Noranda's position in this case. It has been demonstrated that the information sought (cost of alumina and cost of labor) are two portions of the same overall CRU analysis. It is improper to allow Noranda to rely upon portions of an analysis and subsequently shield other portions of that same analysis from discovery. In light of the fact that Noranda routinely discloses other aspects of this same analysis in public filings, the Commission should require Noranda to produce this information immediately.

WHEREFORE, MEUA respectfully requests that the Commission deny MIEC / Noranda's Motion for Reconsideration and order Noranda to immediately provide its response to Data Request Nos. 2, 3 and 12.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.



David L. Woodsmall

Dated: April 25, 2011