

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

Noranda Aluminum, Inc., et al.,)	
)	
Complainants,)	
)	
vs.)	File No. EC-2014-0224
)	
Union Electric Company d/b/a)	
Ameren Missouri,)	
)	
Respondent.)	

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

Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “the Company”) hereby responds to *Complainants’ Suggestions in Partial Opposition to Staff’s Motion for Extension of Time to File Opening and Reply Briefs*, filed on July 1, 2014. For the reasons stated below, Ameren Missouri opposes Complainants’ suggestion that if the Commission grants Staff’s motion to extend the filing date for initial briefs, the Commission should retain the currently scheduled date for filing reply briefs.

1. Prior to the filing of Staff’s motion, Ameren Missouri informed Staff that the Company could accept, and would not oppose, Staff’s proposal to extend to July 8, 2014, the date for filing initial briefs, but only if the date for filing reply briefs was similarly extended until July 17, 2014.

2. The reason for Ameren Missouri’s position is simple: Unless both dates are extended, reply briefs would be due less than a week after Staff’s proposed date for filing initial briefs. Such a short interval between initial and reply briefs in a case such as this would be both unacceptable and untenable.

3. At paragraph 4 of its motion, Staff notes that “the issues presented are numerous and complex – not to say novel, and the record is extensive.” What Staff’s motion fails to mention is there are ten parties to this case, including Staff and the Office of the Public Counsel. Assuming each of those parties files an initial brief, to prepare and file its reply brief each party will be required to read, analyze, and digest the briefs of nine other parties. That task is burdensome enough under the current expedited

schedule, which provides a ten-day interval between initial and reply briefs. But the burden would increase significantly if the interval were shortened to seven days, as would be the case under the alternative schedule suggested by Complainants.

4. Although Ameren Missouri would like to accommodate Staff's request for additional time for filing initial briefs, the Company cannot agree to the proposed extension unless the date for reply briefs also is extended as proposed in Staff's motion. To extend one date without a corresponding extension of the other would be fundamentally unfair, and would deprive the parties a realistic opportunity to fully address in their respective reply briefs all the arguments made in each of the other parties' initial briefs.

WHEREFORE, for the reasons stated in this response, Ameren Missouri prays the Commission to grant Staff's request to extend the date for filing initial briefs only if it also grants Staff's request for a corresponding extension of the date for filing reply briefs. Otherwise, the Commission should deny Staff's motion, and the parties should be required to file their respective initial and reply briefs according to the currently prescribed schedule.

Respectfully submitted,

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**ATTORNEYS FOR UNION ELECTRIC COMPANY
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing pleading was served on each party by electronic mail this 2nd day of July, 2014.

/s/ L. Russell Mitten