

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

Noranda Aluminum, Inc., et al.,	)	
	)	
Complainants,	)	
	)	
vs.	)	<b><u>Case No. EC-2014-0223</u></b>
	)	
Union Electric Company doing business	)	
As Ameren Missouri,	)	
	)	
Respondent.	)	
Noranda Aluminum, Inc., et al.,	)	
	)	
Complainants,	)	
	)	
vs.	)	<b><u>Case No. EC-2014-0224</u></b>
	)	
Union Electric Company doing business	)	
As Ameren Missouri,	)	
	)	
Respondent.	)	

**Staff’s Reply to Ameren Missouri’s Response  
To Complainants’ Motion for Expedited Treatment**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through the Chief Staff Counsel, and for its *Reply to Ameren Missouri’s Response to Complainants’ Motion for Expedited Treatment*, states as follows:

1. Noranda Aluminum Company and thirty-seven other electric customers (“Complainants”) of Ameren Missouri (“Ameren”) filed their *Complaints* on February 12, 2014, commencing Case Nos. EC-2014-0223 and EC-2014-0224.

2. Included in the *Complaints* is a request for expedited treatment and relief.<sup>1</sup>

3. On March 3, 2014, in Case No. EC-2014-0224 and on March 17, 2014, in Case No. EC-2014-0223, Ameren responded in opposition to Complainants' requests for expedited treatment and relief.

4. In reply to Ameren's responses, Staff states that it supports Complainants' request for expedited treatment and relief. Just as emergency rate relief is available to utilities upon proper application and in proper circumstances,<sup>2</sup> so emergency rate relief should be available to ratepayers as a matter of fairness and balance.<sup>3</sup>

5. The Complainants bear the burden of proving their cases and, if they believe they can do so on an expedited basis, Staff will not oppose them.

**WHEREFORE**, Staff prays that the Commission will grant the Complainants' request for expedited treatment and relief; and such other and further relief as is just in the circumstances.

Respectfully submitted,

/s/ Kevin A. Thompson  
**KEVIN A. THOMPSON**  
Missouri Bar Number 36288  
Chief Staff Counsel

Missouri Public Service Commission

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<sup>1</sup> EC-2014-0223 *Complaint*, ¶ 19; EC-2014-0224 *Complaint*, ¶ 22.

<sup>2</sup> ***State ex rel. Utility Consumers' Council of Missouri, Inc. v. Public Service Commission***, 585 S.W.2d 41, 48 (Mo. banc 1979): "An interim rate increase may be requested where an emergency need exists[.]"

<sup>3</sup> ***State ex rel. Union Elec. Co. v. Pub. Serv. Comm'n***, 765 S.W.2d 618, 622 (Mo. App., W.D. 1988): "Ratemaking is a balancing process."; ***State ex rel. Valley Sewage Co. v. Public Service Commission***, 515 S.W.2d 845, 50 (Mo. App., W.D. 1974): "It is axiomatic that a just and reasonable utility rate is a bilateral proposition. Like a coin, it has two sides. On the one side it must be just and reasonable from the standpoint of the utility. On the other side it must be just and reasonable from the standpoint of the utility's customers."

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this **25<sup>th</sup> day of March, 2014**, on the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

**/s/ Kevin A. Thompson**