

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

In the Matter of Union Electric Company     )  
d/b/a Ameren Missouri's Tariffs to Increase     )     Case No. ER-2014-0258  
its Annual Revenues for Electric Service.     )

**POSITION STATEMENT OF MISSOURI RETAILERS ASSOCIATION**

COMES NOW Missouri Retailers Association (MRA) and for its Position Statement in this case states:

The MRA takes a position only on the issues designated below.

19.C. *How should any rate increase be collected from the several customer classes?*

**MRA's Position: The Commission should reduce the proportion of Ameren Missouri's revenue requirement allocated to the small general service, large general service and small primary service customer classes.**

31.A. *Is Noranda experiencing a liquidity crisis such that it is likely to cease operations at its New Madrid smelter if it cannot obtain relief of the sort sought here?*

**MRA's Position: Yes.**

31.A.1. *If so, would the closure of the New Madrid smelter represent a significant detriment to the economy of Southeast Missouri, to local tax revenues, and to state tax revenues?*

**MRA's Position: Yes.**

31.A.2. *If so, can the Commission lawfully grant the requested relief?*

**MRA's Position: Yes.**

31.A.3. *If so, should the Commission grant the requested relief?*

**MRA's Position: Yes.**

31.B. *Would rates for Ameren Missouri's ratepayers other than Noranda be lower if Noranda remains on Ameren Missouri's system at the reduced rate?*

**MRA's Position: All other things being equal, yes.**

31.C. *Would it be more beneficial to Ameren Missouri's ratepayers other than Noranda for Noranda to remain on Ameren Missouri's system at the requested reduced rate than for Noranda to leave Ameren Missouri's system entirely?*

**MRA's Position: Yes.**

31.D. *Is it appropriate to redesign Ameren Missouri's tariffs and rates on the basis of Noranda's proposal, as described in its Direct Testimony and updated in its Surrebuttal Testimony?*

**MRA's Position: Generally, yes.**

31.D.1. *If so, should Noranda be exempted from the FAC?*

**MRA's Position: Yes.**

31.D.2. *If so, should Noranda's rate increases be capped in any manner?*

**MRA's Position: Yes.**

31.D.3. *If so, can the Commission change the terms of Noranda's service obligation to Ameren Missouri and of Ameren Missouri's service obligation to Noranda?*

**MRA's Position: Yes.**

31.D.4. *If so, should the resulting revenue deficiency be made up by other rate payers in whole or in part?*

**MRA's Position: The other rate payers should pick up any revenue deficiency to which Ameren Missouri may be legally entitled.**

31.D.5. *If so, how should the amount of the resulting revenue deficiency be calculated?*

**MRA's Position: As provided by Mr. Brubaker.**

31.D.6. *If so, can the resulting revenue deficiency lawfully be allocated between ratepayers and Ameren Missouri's shareholders?*

**MRA's Position: Yes.**

31.D.6.i. *How should the revenue deficiency allocated to other ratepayers be allocated on an interclass basis?*

**MRA's Position: As provided by Mr. Brubaker.**

31.D.7. *If so, what, if any, conditions or commitments should the Commission require of Noranda?*

**MRA's Position: The Commission may impose reasonable conditions on Noranda, consistent with and in conjunction with granting the requested relief.**

31.G. *Is it appropriate to remove Noranda as a retail customer as proposed by Ameren Missouri in its Rebuttal Testimony?*

**MRA's Position: No.**

The MRA does not take a position on any other issue at this time, but reserves the right to do so as additional evidence is presented to the Commission.

**WHEREFORE**, having apprised the Commission of its position on the issues in this case, the MRA asks the Commission to order accordingly in its Report and Order in this case.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

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### **CERTIFICATE OF SERVICE**

I hereby certify that true and accurate copies of the above were sent via electronic mail, this 19<sup>th</sup> day of February, 2015, to the following parties of record:

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