

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

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|---------------------------------|---|-----------------------|
| Noranda Aluminum, Inc., et al., |) | |
| |) | |
| Complainants, |) | |
| |) | |
| v. |) | Case No. EC-2014-0223 |
| |) | |
| Union Electric Company d/b/a |) | |
| Ameren Missouri, |) | |
| |) | |
| Respondent. |) | |

**COMPLAINANTS’ REPLY TO STAFF’S RESPONSE TO
COMPLAINANTS’ MOTION TO SET TEST YEAR AND TRUE-UP**

COME NOW Complainants, and for their Reply to Staff’s Response to Complainants’ Motion to Set Test Year and True-Up, state as follows:

1. On May 1, 2014, Complainants filed their Motion to Set Test Year and True-Up (“Motion”), requesting that the Commission (1) establish the twelve months ended September 30, 2013 as the test year for this case and (2) establish a true-up of March 31, 2014.

2. On May 2, 2014, the Commission Staff filed its Response to Complainants’ Motion (“Response”) stating that the rate analysis in this case should be based on a full year of data, and that data for the twelve months ended December 31, 2013 will be of greatest use to the Commission in determining this case. Staff further states that it does not object to Complainants’ proposal for a true up period ending March 31, 2014, but notes that all parties should have the right to address significant changes past March 31, 2014 if applicable.

3. Complainants do not oppose the Staff's desired test year consisting of the twelve months ended December 31, 2013. A test year is necessary for all parties to have the same starting point for their analysis, and is essential for the Commission and the parties to identify and quantify the issues presented in this case. Without an established test year, the ability of parties to reconcile their cases for the Commission will be virtually impossible.

4. Complainants also agree with Staff that a true up period of March 31, 2014 is appropriate. Complainants also recognize that parties have the right to propose isolated adjustments beyond the March 31, 2014 known and measurable period if applicable.

WHEREFORE, Complainants request that the Commission (1) establish a test year consisting of the twelve months ended December 31, 2013 as suggested in Staff's Response; and (2) establish a true up date for known and measurable changes for the period ending March 31, 2014.

Respectfully submitted,

BRYAN CAVE LLP

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Attorneys for Complainants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by electronic mail this 9th day of May, 2014, to the parties on the Commission's service list in this case.

/s/ Diana M. Vuylsteke