

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

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

THE CONSUMERS COUNCIL OF MISSOURI’S STATEMENT OF POSITIONS

COMES NOW the Consumers Council of Missouri (“Consumers Council” or “CCM”) and for its Statement of Positions, submits the following positions on the issues identified by the parties in the List of Issues filed on June 4, 2014:

1. 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?

The Consumers Council takes no position at this time, but reserves the right to take a position in the future as additional evidence is presented to the Commission.

a. 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?

Yes, closure of the smelter would represents a significant detriment to the economy of Southeast Missouri. Consumers Council has not calculated the impact on local tax revenues and state tax revenues, and so, takes no position on that part of the question, but reserves

the right to take a position as additional evidence is presented to the Commission.

b. If so, can the Commission lawfully grant the requested relief?

Yes.

c. If so, should the Commission grant the requested relief?

The Consumers Council takes no position at this time, but reserves the right to take a position in the future as additional evidence is presented to the Commission.

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

The Consumers Council takes no position at this time, but reserves the right to take a position in the future as additional evidence is presented to the Commission.

3. 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?

The Consumers Council takes no position at this time, but reserves the right to take a position in the future as additional evidence is presented to the Commission.

4. 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?

The Consumers Council takes no position at this time, but reserves the right to take a position in the future as additional evidence is presented to the Commission.

a. If so, should Noranda be exempted from the FAC?

No.

b. If so, should Noranda's rate increases be capped in any manner?

No.

c. 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?

Yes.

d. If so, should the resulting revenue deficiency be made up by other ratepayers in whole or in part?

No.

e. If so, how should the amount of the resulting revenue deficiency be calculated?

The Consumers Council takes no position at this time, but reserves the right to take a position in the future as additional evidence is presented to the Commission.

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

Yes.

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

Consumers Council supports the position of OPC on this issue, as explained on pages 10-11 of the Surrebuttal Testimony of OPC witness Lena Mantle. If, despite objections and recommendations to the contrary notwithstanding, the Commission seeks to order any revenue requirement shift to other ratepayers, such revenue requirement shift should be equally applied to all classes, including the lighting class.

ii. How should the revenue deficiency allocated to other ratepayers be allocated on an intra-class basis?

Consumers Council supports the position of OPC on this issue, as explained on pages 9-10 of the Surrebuttal Testimony of OPC witness Lena Mantle. If, despite objections and recommendations to the contrary notwithstanding, the Commission grants such relief, for the Residential and SGS classes, the shift should only apply to the volumetric (\$/kWh) charges on each rate. For the LGS, SPS and LPS customers, the allocation should apply equally to the demand charge and the energy charge because changing the relationship between these two rates could impact the cost effectiveness of energy-efficiency changes that customers currently participating in the program are making.

g. If so, what, if any, conditions or commitments should the Commission require of Noranda?

Consumers Council supports the conditions recommended by OPC on this issue.

5. What is Ameren Missouri's variable cost of service to Noranda?

The Consumers Council takes no position at this time, but reserves the right to take a position in the future as additional evidence is presented to the Commission.

a. Should this quantification of variable cost be offset by an allowance for Off-System Sales Margin Revenue?

The Consumers Council takes no position at this time, but reserves the right to take a position in the future as additional evidence is presented to the Commission.

b. What revenue benefit or detriment does the Ameren Missouri system receive from provision of service to Noranda at a rate of \$30/MWh?

The Consumers Council takes no position at this time, but reserves the right to take a position in the future as additional evidence is presented to the Commission.

6. Should Noranda be served at a rate materially different than Ameren Missouri's fully distributed cost to serve them? If so, at what rate?

The Consumers Council takes no position at this time, but reserves the right to take a position in the future as additional evidence is presented to the Commission.

Respectfully submitted,

/s/ John B. Coffman

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Dated: June 6, 2014

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties currently listed on the official service list of the above-styled case on this 6th day of June, 2014.

/s/ John B. Coffman
