

**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 Motion to Shorten Time to Respond to Discovery**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through the Chief Staff Counsel, and for its *Motion to Shorten the Time to Respond to Discovery*, 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>

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

3. On April 16, 2014, the Commission issued its *Order Establishing Procedural Schedule* in each of these complaint cases, adopting a shortened schedule as advocated by Complainants.

4. In its Orders of April 16, the Commission also directed the Staff to undertake certain investigations and analyses and specifically directed Staff to do so in accordance with the shortened procedural schedules referred to above.

5. In order to comply with the Commission's directions, Staff will need to obtain data from other parties, in particular, from Ameren Missouri, very quickly. For this reason, Staff moves that the Data Request response and objection intervals be reduced to five (5) business days for response and three (3) business days for objection, effective immediately.

6. Staff has consulted with counsel for each of the other parties to both of these cases and they have indicated that they have no objection to this motion.

**WHEREFORE**, Staff prays that the Commission will grant Staff's motion that the Data Request response and objection intervals be reduced to five (5) business days for response and three (3) business days for objection, effective immediately; 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  
P.O. Box 360  
Jefferson City, MO 65102

573-751-6514 (Voice)  
573-526-6969 (Fax)  
kevin.thompson@psc.mo.gov

Attorney for the Staff of the  
Missouri Public Service Commission

**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 **17<sup>th</sup> day of April, 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**