

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

In the Matter of Noranda Aluminum, Inc.’s)	
Request for Revisions to Union Electric)	
Company d/b/a Ameren Missouri’s Large)	Case No. EC-2014-0224
Transmission Service Tariff to Decrease its)	
Rate for Electric Service)	

**COMPLAINANTS’ RESPONSE TO
MOTION TO RECLASSIFY**

COME NOW Complainants, and for their response to Union Electric Company’s d/b/a Ameren Missouri (“Ameren Missouri”) Motion to Reclassify, state as follows:

1. In their Complaint and supporting testimonies, Complainants designated “HC” certain information they deem to be highly confidential within the definitions set in 4 CSR 240-2.135(1)(B).

2. Ameren Missouri seeks to share such information (and additional information Complainants may later designate as “HC” or Proprietary) with those of its and its affiliates employees who its attorneys determine need access to the information in order for its attorneys to handle the Complaint. They can share such information if it is classified as “proprietary;” they cannot if it is classified as “highly confidential.” See 4 CSR 240-2.135(4) and (5). Accordingly, Ameren Missouri filed the subject Motion seeking reclassification of the confidential information thus far submitted by Complainants in this case from “highly confidential” to “proprietary” or, alternatively, that the Commission waive its rule so that Ameren Missouri be subject to no sanctions in the event it treats such information as proprietary.

3. Complainants’ counsel has conferred with Ameren Missouri’s counsel and agreed, without waiving its claim of “HC” status as to any as yet undetermined parties in this case, that Ameren Missouri’s counsel may share any information designated by Complainants in

this case as “HC” with such employees without challenge or objection by Complainants and otherwise use the information as would be allowed if it had been designated “proprietary.” Accordingly, Ameren Missouri has agreed to withdraw its Motion with the understanding that Ameren Missouri is not waiving its right to challenge whether additional information Complainants may designate as confidential actually qualifies for confidential treatment under the Commission’s rules.

4. Complainants agree that the Commission should waive the requirements of 4 CSR 240-2.135 as to Ameren Missouri relative to any information Complainants designate as “HC” in this matter, so long as Ameren Missouri treats such information as proprietary.

5. The undersigned has contacted counsel for the Staff, OPC, and Tim Schwartz, whose client has moved to intervene and none of those parties objects to this resolution of the Motion.

WHEREFORE, Complainants move the Commission to promptly grant Ameren Missouri its requested waiver, whereupon Ameren Missouri will otherwise withdraw its Motion.

Respectfully submitted,

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Attorneys for Noranda Aluminum, Inc.
and Individual Complainants

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 28th day of February, 2014, to all counsel of record and Tim Schwartz.

/s/ Edward F. Downey