

## Metropolitan St. Louis Sewer District

2350 Market Street St. Louis, MO 63103-2555 (314) 768-6200

June 3, 2014

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Robert S. Kenney, Chairman Stephen M. Stoll, Commissioner William P. Kenney, Commissioner Daniel Y. Hall, Commissioner

Missouri Public Service Commission 200 Madison Street Jefferson City, MO 65102-0360

Re: Noranda Aluminum, Inc. et al. Complainants v. Union Electric Company d/b/a Ameren Missouri, Respondent

Case No. EC-2014-0223

Dear Honorable Chairman and Commissioners:

I am writing to notify you of the Metropolitan St. Louis Sewer District's (MSD) opposition to a February 12, 2014 rate case filing made with the Missouri Public Service Commission (PSC) by Noranda Aluminum, a Tennessee-based company with a smelter in New Madrid, MO. The rate case will adversely impact MSD customers.

MSD as established by the Missouri Constitution is a municipal corporation and political subdivision of the State of Missouri serving over 1.3 million customers in St. Louis and St. Louis County. Currently, the District is under a Consent Decree with the EPA that requires the District to spend an estimated 4.7 billion dollars in infrastructure improvements over 23 years. This massive program requires large rate increases and an intense focus on efficiency and cost control. Outside of personnel expenses, electricity is the District's largest single operating expense.

While the District understands Noranda's desire to reduce expenses, Noranda already has the lowest rates of any Ameren customer in Missouri. The claim filed by Noranda seeks to further reduce their rate by another 25 percent. This reduction would shift costs to the other consumers to subsidize this rate. If this rate shift is approved, it will cost MSD customers an additional \$2.5 million over the next 10 year rate shift request. We are strongly opposed to this additional cost to MSD customers.

Thank you for your attention to this urgent matter.

Sincerely,

Jonathon C. Sprague Director of Operations