Exhibit No.: 600 Issue: Noranda Operations Witness: George Swogger Type of Exhibit: Direct Testimony Sponsoring Party: Noranda Case Number: ER-2007-0002 Date Testimony Prepared: Dec. 29, 2006

AmerenUE

Case No. ER-2007-0002

Prepared Direct Testimony of

George Swogger

On behalf of

Noranda Aluminum, Inc.



December 2006

Vorance Exhibit No. 600 Date 3-15-07 Case No. F.R-2007-0002 Reporter X5

#### BEFORE THE

### PUBLIC SERVICE COMMISSION

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In the Matter of Union Electric Company d/b/a AmerenUE for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Company's Missouri Service Area.

Case No. ER-2007-0002

#### Affidavit of George Swogger

State of Missouri ) County of <u>New Madi</u>

George Swogger, of lawful age, on his oath states: that he has reviewed the attached written testimony in question and answer form, all to be presented in the above case, that the interest in the attached written testimony were given by him; that he has knowledge of the matters set forth in such answers; that such matters are true to the best of his knowledge, information and belief.

<u>Linn</u> <u>Moja</u> George Swogger

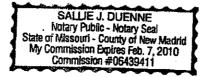
Subscribed and sworn before me this 5 th day of December, 2006

Notary Public

[SEAL]

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My Commission expires: <u>2/1/201</u>0



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#### Before the

Missouri Public Service Commission

AmerenUE

Case No. ER-2007-0002

#### Prepared Direct Testimony of George Swogger

- 1 INTRODUCTION
- 2 Q PLEASE STATE YOUR NAME AND ADDRESS.
- 3 A George Swogger. My address is 110 Holmes Drive, Sikeston, Missouri 63801.

#### 4 Q BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

- 5 A I am employed by Noranda Aluminum, Inc. as Manager Energy Procurement
- 6 for the aluminum Smelter located in the St. Jude Industrial Park near the City
- 7 of New Madrid, Missouri. I will refer to this facility as the "Smelter."
- 8 Q PLEASE SUMMARIZE YOUR EDUCATION AND EXPERIENCE.
- 9 A In 1974 I received a Bachelor of Science degree in industrial engineering from
- 10 West Virginia University. I worked as an industrial engineer for other aluminum
- 11 companies from 1974 through 1980. In 1980 I began my employment with

1 Noranda as the Chief Industrial Engineer. In 1984 I was promoted to the 2 position of Administrative Manager. My responsibilities included cost 3 accounting, payroll, and management of the St. Jude Industrial Park. I also 4 assisted corporate staff in the administration of Noranda's power contracts. In 5 1990 my title remained the same, but my responsibilities changed. My previous 6 responsibilities were replaced with responsibilities including all purchasing, 7 warehousing, and traffic. I also assumed responsibility for administration of 8 Noranda's power contracts. From 1980 thru 2002 I was also responsible for 9 industrial engineering for the plant. In 2002 my responsibilities changed to 10 Manager of the Rod Mill and Manager of Energy Procurement. From late 2003 11 through the present my entire responsibility has been energy procurement. In 12 that role my title is Manager -- Energy Procurement.

#### 13 Q WHAT ARE THE PURPOSES OF YOUR TESTIMONY?

A There are two. First, I want to explain the service requirements of the
Smelter. These include the need for a cost based rate. Second, while I am not
an attorney and do not intend to offer a legal opinion, I want to explain from
my own perspective why a cost based rate for Noranda is in the public interest.
With these purposes in mind I hope to obtain approval of a cost-based rate for
Noranda under the Large Transmission Service ("LTS") rate schedule.

1	Q	WILL OTHER WITNESSES ALSO APPEAR IN SUPPORT OF NORANDA?
2	A	Yes. Mr. Donald Johnstone, President of Competitive Energy Dynamics, L. L. C.
3		supports a cost-based rate for Noranda. Mr. Steve McPheeters will also provide
4		testimony. His position with Noranda is Superintendent of Communication,
5		Training - Development, and Continuous Improvement. Mr. McPheeters is also
6		Chairman of the Southeast Missouri Economic Development Alliance (SMEDA).
7		Mr. McPheeters will describe the importance of the Smelter as a member of the
8		community, including the economic importance of the Smelter to the State of
9		Missouri generally and to the southeastern region of Missouri. Additional
10		witnesses include: New Madrid County Commissioner Mark Baker and Mr.
11		Harvey Cooper, Executive Director of the Community Sheltered Workshop.
12		These witnesses will offer testimony related to some of the broad public
13		interests in the continuing viability of the Smelter.
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#### 15 SMELTER PRODUCTS AND ELECTRICITY REQUIREMENTS

16 Q PLEASE DESCRIBE THE PRODUCT PRODUCED AT THE NORANDA SMELTER AND 17 THE MARKET INTO WHICH THE PRODUCT IS SOLD.

A The plant produces four products: billet, rod, foundry products and primary
ingots. The products are sold into a market that in most respects is a world
market. Of course, the Smelter tries to exploit both its abilities to serve niches
and its mid-continent location to sell to regional customers within the market.

1		With respect to the State of Missouri, the Smelter is an export industry. This
2		means that revenue from products sold mostly outside of Missouri flows into
3		the State. Again, Mr. McPheeters will address this topic.
4	Q	PLEASE DESCRIBE THE PROCESS USED TO SMELT ALUMINUM.
5	A	The plant receives alumina via barge over the Mississippi river. The alumina is
6		offloaded from the barges and moved to the Smelter by conveyer. There it is
7		processed in one of the three production lines (pot lines) where electricity is
8		used to break the bond between aluminum and oxygen in the alumina.
9		Generally the finished products are shipped via truck and some by rail.
10	Q	OVER THE PERIOD OF A YEAR WHAT WILL BE THE APPROXIMATE QUANTITIES
11		OF ALUMINUM PRODUCED AND ELECTRICITY CONSUMED?
12	Α	On an annual basis the plant will produce 253,000 metric tons of aluminum and
13		consume about 4 million MWh (475 MW at 98% load factor). At the $$32.50$ per
14		MWh price under the present LTS tariff the annual amount paid to AmerenUE is
15		over \$130 million. Over the current 15 year term of the contract this amounts
16		to \$2 billion at the current price under the LTS rate.
17	Q	PLEASE DESCRIBE SOME OF THE IMPORTANT CHARACTERISTICS OF THE
18		ELECTRICITY REQUIREMENTS OF THE SMELTER.
19	А	First and foremost the supply must be reliable. The smelting process is

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20 continuous and cannot be cycled on and off. Any unmanaged interruption of

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the supply beyond an hour is very serious and would be likely to cause
extensive damage to the process and create a major capital expense to repair
and rebuild. I cannot predict with any certainty the future economic and
operational impact should a major interruption occur in spite of our efforts to
secure a reliable supply of power, but I know the consequences could be so
severe as to result in a permanent closure of the plant. Consequently,
AmerenUE's ability to provide reliable service is extremely important.

8 Equally important is the impact of the cost of electricity on the 9 economic viability of the plant. Electricity costs are important because 10 electricity represents approximately 1/3 of the Smelter's operating cost and is 11 historically the single largest operating cost. The Smelter's ability to remain 12 viable depends on maintaining our ability to deliver a competitively priced 13 product. Electricity has a large part to play in that. Of course, the prevailing 14 market prices we receive for the products we produce and other costs are all 15 also important considerations. Although the Smelter is large, we are not a market maker so we must accept the market prices. Therefore, it is critical 16 that all costs, and electricity in particular as our largest cost, remain 17 18 economical and under control to the extent possible.

# 19 QARE THERE ANY LOAD MANAGEMENT POSSIBILITIES WITH THE NORANDA20LOAD?

A First and foremost the power supply must be firm power. With that
understanding | can identify approximately a 10% load management potential

1	for a limited number of hours per event, a limited number of events per year,
2	and with the provision of adequate recovery time between events. Of course,
3	Noranda would cooperate in any way possible in the development of any load
4	management/rate product that would be consistent with the operational and
5	reliability parameters of the Smelter. To date we have not developed any
6	arrangements along these lines.

7 PUBLIC INTEREST CONSIDERATIONS

## 8 Q WHAT ARE THE PUBLIC INTEREST CONSIDERATIONS RELATED TO ELECTRIC 9 UTILITY SERVICE FOR NORANDA?

- A First, the Smelter resides in Missouri and is a part of the public in the State. I
   believe there is a positive public interest in reliable and economical cost-based
   service for the Smelter simply because of this fact. I believe the interest in
   reliable and economical service is shared by all customers.
- 14 On another level, the Smelter makes many contributions to the public 15 interest in both economic and social terms. Those contributions include jobs, 16 payroll, purchases from local suppliers, taxes, and leadership contributions to the communities surrounding the Smelter. Also, to state the obvious, the 17 18 Smelter is making a very large purchase from another Missouri company, AmerenUE. Noranda witnesses Commissioner Mark Baker, Mr. Harvey Cooper, 19 and Mr. Steve McPheeters also address the importance of the Smelter to 20 21 Missouri in their testimonies.

#### 1 NORANDA RECOMMENDATION

2 Q IN YOUR TESTIMONY BEFORE THIS COMMISSION IN DOCKET EA-2005-0180 3 YOU EXPRESSED CONCERNS WITH REGULATED SERVICE. DO YOU CONTINUE **TO HAVE CONCERNS?** 4 5 Yes. In my direct testimony at page 7 | stated: Α A downside concern is the possibility of a future rate decision that 6 7 would increase the cost to the Smelter in a manner that was not 8 related to the cost of providing the service. While this is troublesome, the Smelter is depending on decisions by the 9 Commission that will not discriminate against Noranda. 10 11 I continue to have those concerns and Noranda continues to rely on the 12 Commission for a nondiscriminatory decision. Unfortunately, in this case 13 AmerenUE has proposed a blatant discriminatory shift of costs attributable to the residential class under its class cost-of-service study to the Smelter and 14 15 other customers. My concerns are only amplified by the size of the increase proposed by AmerenUE. 16 However, in contrast to AmerenUE's request for \$361 million, the Staff 17 of the Commission has identified the need for a rate decrease estimated at 18 \$157 million. The AG has identified the need for a decrease of \$53 million. 19 20 Other parties have addressed specific issues with the apparent intent to avoid any unnecessary increase. At this time Noranda is not asserting any position on 21 22 the appropriate amount of any increase or decrease, but may assert a position later in the case. In consideration of the range of possibilities, Mr. Johnstone 23 at this time will support the principle of a cost based rate for Noranda and we 24

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<ul> <li>the class cost-of-service studies and rate recommendations of the part</li> <li>i expect the record to fully support a cost-based rate for the Si</li> <li>and Noranda will vigorously pursue that objective. I would ask the Cor</li> <li>to consider carefully the testimony and evidence on these subjects and</li> <li>rate for Noranda that is equal to the cost of the service provided - no r</li> <li>no less.</li> </ul>	propriate in
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6 rate for Noranda that is equal to the cost of the service provided - no r	Commission
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- 8 Q DOES THIS COMPLETE YOUR TESTIMONY?
- 9 A Yes it does.

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