BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Increase Its Revenues for Electric Service

Case No. ER-2012-0166

MISSOURI INDUSTRIAL ENERGY CONSUMERS' RESPONSE TO AMEREN MOTION TO COMPEL COMPLIANCE WITH ORDER RESOLVING ISSUES PRESENTED AT DISCOVERY CONFERENCE

Comes now the Missouri Industrial Energy Consumers (MIEC) and for its Response to Ameren Missouri's Motion to Compel Compliance with Order Resolving Issues Presented at Discovery Conference states as follows.

1. On September 28, 2012, MIEC provided Ameren Missouri's counsel with Noranda Aluminum, Inc.'s 2012 budget and financial projections for the New Madrid Smelter for the years 2012 through 2015. This document is designated as Highly Confidential.

2. Noranda has prepared no budgets for the New Madrid Smelter for any years other than 2012 and has no financial projections for the New Madrid Smelter other than the financial projections provided to Ameren Missouri's counsel on September 28, 2012.

3. The Affidavit of Stacy Dean, Financial Planning & Analysis Manager of Noranda Aluminum, Inc., is attached in support of the facts stated in this response.

Respectfully submitted,

BRYAN CAVE, LLP

By: <u>/s/ Diana Vuylsteke</u>

Diana M. Vuylsteke, # 42419 211 N. Broadway, Suite 3600 St. Louis, Missouri 63102 Telephone: (314) 259-2543 Facsimile: (314) 259-2020 E-mail: <u>dmvuylsteke@bryancave.com</u>

Attorney for The Missouri Industrial Energy Consumers

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 1st day of October, 2012, to all parties on the Commission's service list in this case.

/s/ Diana Vuylsteke

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Tariff Filings of Union Electric Company, d/b/a Ameren Missouri, to Increase Its Revenues for Retail Electric Service

Case No. ER-2012-0166

STATE OF TENNESSEE

COUNTY OF WILLIAMSON

SS

Affidavit of Stacy Dean

Stacy Dean, being first duly sworn, on his oath states:

1. My name is Stacy Dean. I am the Financial Planning & Analysis Manager for Noranda, Inc., having its principal place of business at 801 Crescent Centre Drive, Suite 600, Franklin, Tennessee, 37067.

2. On September 28, Noranda produced to Ameren Missouri (a) its 2012 LME-adjusted budget (b) all of its financial projections for 2012 through 2015. No budget for any additional year has been prepared and no additional financial projections exist.

3. I hereby swear and affirm that information provided is true and correct.

Stacy Dean

Subscribed and sworn to before me this 1st day of October, 2012.



Notary Public y commission expires 11/7/12