BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Application of Union Electric Company)		
d/b/a AmerenUE, for a Metering Tariff)	Case No	
Variance to Serve Kingsbury Terrace)		

APPLICATION FOR VARIANCE OF UNION ELECTRIC COMPANY

COMES NOW Union Electric Company d/b/a AmerenUE ("AmerenUE" or "Company") and for its Application for a Variance from 4 CSR 240-20.050 and Section II.K. of the Company's Schedule 5 – Schedule of Rates for Electric Service and associated billing provisions, states as follows:

- 1. Company is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 1901 Chouteau Avenue, St. Louis, Missouri 63103. The Company is engaged in providing electric and gas utility services in portions of Missouri as a public utility under the jurisdiction of the Missouri Public Service Commission ("Commission"). The Company is also engaged in providing electric and gas service in portions of Illinois. There is already on file with the Commission a certified copy of the Company's Restated Articles of Incorporation (*see*, Commission Case No. EO-96-431), a Certificate of Corporate Good Standing (*see*, Commission Case No. EF-2003-0514), and a copy of Company's Fictitious Name Registration as filed with the Missouri Secretary of State's Office (*see*, Commission Case No. GO-98-486), and said documents are incorporated herein by reference and made a part hereof for all purposes.
- 2. Pleadings, notices, orders and other correspondence concerning this Application should be addressed to:

Thomas M. Byrne
Managing Associate General Counsel
Ameren Services Company
1901 Chouteau Ave.
P.O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149

- 3. At the request of the customer, St. Louis Housing Authority, the Company seeks a variance from the individual metering requirement of 4 CSR 240-20.050(2) and Section II.K. of the Company's Schedule 5 Schedule of Rates for Electric Service for the Kingsbury Terrace renovation project to be located at 5655 Kingsbury Ave, St. Louis, Missouri ("Kingsbury Terrace Project"). Attached to this request, as Attachment A, is a letter from the St. Louis Housing Authority, which discusses the variance request and provides detail about the renovation project.
- 4. The renovation project will result in 120 total units 110 –one bedroom and 10 two bedrooms and will offer low income housing for elderly residents with the exception of also offering residency to disabled individuals. The building will be financed with grant funds provided by the U. S. Department of Housing and Urban Development ("HUD") to the St. Louis Housing Authority ("SLHA"). These funds will then be loaned to the building owner for the purposes of constructing the project. Each apartment will be heated and cooled by its own packaged electric unit. A central domestic hot water heater will provide hot water throughout the building including the individual apartments.
- 5. The customer has requested that one electric meter be installed to serve the building and as a result, if this variance request is approved, the customer will be responsible for the payment of the bills for electric service. Absent approval of this variance request, individual metering for each apartment along with a "house" meter for electricity provided for common use would be required. Such metering would only increase initial construction costs and creates credit and payment concerns with the very low-income occupants of the facility.

6. This facility will house a common dining, laundry, and seating room (lounge) as well as the above mentioned housing units.

7. Requiring individual metering will unnecessarily increase the Company's investment and increase costs for the customer. AmerenUE estimates that individually metering each unit versus master metering would result in additional expenditures of approximately \$10,000. The customer estimates savings of approximately \$30,000 if the variance is approved.

WHEREFORE, for the foregoing reasons, AmerenUE respectfully requests a variance from the individual metering requirement of 4 CSR 240-20.050 and Section II.K of the Company's Schedule 5 – Schedule of Rates for Electric Service along with any associated billing provisions, to allow master metering for the Kingsbury Terrace Project as set forth herein.

Respectfully submitted,

UNION ELECTRIC COMPANY d/b/a AmerenUE

By: Thomas M. B

Thomas M. Byrne, MBE No. 33340

Attorney for

Ameren Services Company

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Dated: September 21, 2005

VERIFICATION

STATE OF MISSOURI)
) SS
CITY OF ST. LOUIS)

On this 21st day of September, 2005, I, Thomas M. Byrne, a licensed attorney in good standing employed by Ameren Services Company, being first duly sworn upon my oath, state that I have read the foregoing *APPLICATION FOR VARIANCE OF UNION ELECTRIC COMPANY*, that the facts stated therein are true and correct to the best of my knowledge, information and belief and that the above attorney is authorized to file such document on behalf of Union Electric Company d/b/a AmerenUE

Thomas M. Byrne

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal on the date first written above.

My Commission Expires: ____

CAROLYN J. WOODSTOCK

Notary Public - Notary Seal STATE OF MISSOURI Franklin County

My Commission Expires: May 19, 2008

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and copy of the foregoing Notice of Dismissal was served on all parties of record via United States first-class mail, postage pre-paid, or by electronic mail (e-mail) on this 21st day of September, 2005.

Missouri Public Service Commission P.O. Box 360 Jefferson City, Missouri 65102 gencounsel@psc.state.mo.us

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St. Louis Housing Authority 410 Lindell Boulevard St. Louis, Missouri 63108

Thomas M. Byrne