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

In the Matter of the Application of	)	
reStart Housing Services, Inc. for a	)	Case No. EE-2015-0177
Variance from 4 CSR 240-20.050	)	
Regarding Individual Electric Meters	)	

# KANSAS CITY POWER & LIGHT COMPANY'S RESPONSE TO THE APPLICATION OF RESTART HOUSING SERVICES, INC. FOR A VARIANCE FROM THE INDIVIDUAL ELECTRIC METER REQUIREMENT AND MOTION FOR EXPEDITED TREATMENT

COMES NOW Kansas City Power & Light Company ("KCP&L") and hereby respectfully submits its response to the *Application of reStart Housing Services, Inc. for a Variance from the Individual Electric Meter Requirement and Motion for Expedited Treatment* ("Application").

- 1. On January 29, 2015, reStart Housing Services, Inc. ("reStart") filed an Application.
- 2. On January 30, 2015, Missouri Public Service Commission ("Commission") filed an *Order Making KCP&L a Party and Directing KCP&L and Staff to Respond to reStart Housing Services, Inc.'s Application for Variance*.
- 3. KCP&L supports reStart's efforts to build a facility to serve single young adults with disabilities. KCP&L believes that the variance requested in reStart's Application is unnecessary under the Commission's rules. Under 4 CSR 240-20.050(4)(A) the Commission's single meter requirement does not apply to transient multiple-occupancy buildings such as dormitories and rooming houses. The housing facilities described in reStart's Application fit this exception as the 14 unit building is being established exclusively for charitable and/or educational purposes. The facility will be operated as a not-for-profit program to serve young

adults who have aged out of foster care programs. The program will pay the utility bills on behalf of tenants and none of the tenants would receive individual bills from reStart. This type of living arrangement is also seen in dormitories which also are typically operated for charitable and/or educational purposes.

4. The Commission should rely on section (4)(A) of 4 CSR 240-20.050 and indicate to reStart that it can build its facility without the need for individual meters.

WHEREFORE, KCP&L respectfully submits this response to reStart Housing Services, Inc.'s Application.

Respectfully submitted,

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#### **Certificate of Service**

I hereby certify that a true and correct copy of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all parties of record on this  $10^{th}$  day of February, 2015.

### s Roger W. Steiner

Attorney for Kansas City Power & Light Company