

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

Application of Union Electric Company)
d/b/a AmerenUE for a Metering Variance) Case No. _____
to Serve Vaughn Elderly Apartments)

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 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
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3. At the request of one of its customers, McCormack Baron Salazar, Inc. (“Customer”), 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 Vaughn Elderly Apartments project to be located at 1919 O’Fallon Street, St. Louis, Missouri.

4. The project will consist of 111 apartment units (108 1-bedroom units and 3 2-bedroom units) and will generally house low income, elderly citizens. The building will be financed with grant funds provided by the U. S. Department of Housing and Urban Development to the St. Louis Housing Authority. 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 will be required. Such metering would only increase initial construction costs and may create credit and payment concerns with the very low income occupants of the facility.

6. This facility will house a common multipurpose room on the ground floor where resident dining will take place with an adjacent warming kitchen where pre-prepared meals (like meals on wheels) will be served to residents. Also adjacent to the multipurpose room will be a billiards room, a fitness room, common mail delivery area, restrooms, and a conference room that is available to the residents. The ground floor will also contain an on-site building management office, an office for the resident Tenant Affairs Board office, common vending machines, two common resident laundry rooms, trash rooms, and a common resident sun room. Centralized electric fan coil units will provide the heating and air conditioning to these common areas. The second floor will contain a common lounge space, common resident laundry rooms, restrooms, trash rooms, and a doctor’s examining room. The third floor will contain a common lounge space, common resident laundry rooms, restrooms, trash rooms, and a beauty salon. The residents’ apartments occupy approximately 65% of the total floor space of the facility.

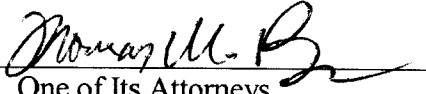
7. Requiring individual metering for this apartment complex will unnecessarily increase the Company’s investment and increase costs for the Customer. AmerenUE estimates that individually metering each unit versus master metering would result in additional expenditures of approximately \$55 per apartment, or \$6,100 in total. The customer estimates savings of approximately \$750 per apartment or \$83,250 in total if the variance is approved. The Customer and its low income tenants will benefit if this variance is granted, and neither AmerenUE nor any of its other customers will be adversely affected.

8. Other than cases pending before this Commission, AmerenUE has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this application. AmerenUE has no annual report or assessment fees which are overdue.

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 to allow master metering for the Vaughn Elderly Apartments building as set forth herein.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

By 
One of Its Attorneys

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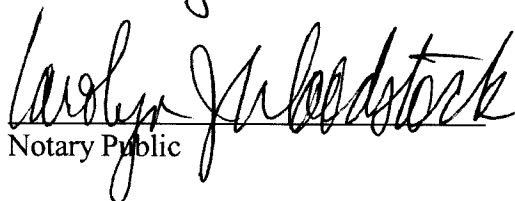
VERIFICATION

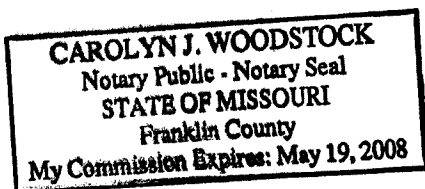
STATE OF MISSOURI)
) SS.
CITY OF ST. LOUIS)

I, Ronald C. Zdellar, a Vice President of Union Electric Company, being duly sworn upon my oath, do hereby state that I have read the foregoing document and that the facts stated therein are true and correct to the best of my knowledge, information and belief, and that I am authorized to file such document on behalf of Union Electric Company.



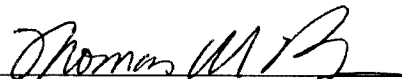
Subscribed and sworn to before me this 5th day of May, 2005.


Notary Public



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the Office of Public Counsel, by first class mail, postage prepaid, on this 5th day of May, 2005.



Thomas M. Byrne