

Ameren Services
(314) 554-3533
(314) 554-4014 (fax)
efitzhenry@ameren.com

One Ameren Plaza
1901 Chouteau Avenue
PO Box 66149
St. Louis, MO 63166-6149
314.621.3222

July 28, 2003

VIA FEDERAL EXPRESS

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED⁴

JUL 29 2003

**Missouri Public
Service Commission**




Re: Variance for West Pine Apartments

Dear Mr. Roberts:

Enclosed for filing on behalf of Union Electric Company, d/b/a AmerenUE, please find an original and eight (8) copies of its: **Application for Variance** and **Motion to Admit Pro Hac Vice**.

Kindly acknowledge receipt of this filing by stamping a copy of the enclosed letter and returning it to me in the enclosed self-addressed envelope.

Very truly yours,


Edward C. Fitzhenry
Associate General Counsel

ECF/acs
Enclosures

cc: Missouri Public Service Commission
Office of the Public Counsel

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

Application of Union Electric Company)	
for a Variance)	Case No. _____
for West Pine 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. Non-Standard Service 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:

Edward C. Fitzhenry
Associate General Counsel
Ameren Services Company
1901 Chouteau Avenue
P.O. Box 66149
St. Louis, MO 63166-6149
314-554-3533 (phone)
314-554-4014 (fax)
efitzhenry@ameren.com

Joseph H. Raybuck
Managing Assistant General Counsel
Ameren Services Company
1901 Chouteau Avenue
P.O. Box 66149
St. Louis, MO 63166-6149
314-554-2976 (phone)
314-554-4014 (fax)
jraybuck@ameren.com

3. At the request of the customer herein, the Company seeks a variance from the individual metering requirement of 4 CSR 240-20.050(2) and Section II.K. Non-Standard Service of the Company's Schedule 5 – Schedule of Rates for Electric Service for the West Pine Apartment project located at 4490 Forest Park, St. Louis, Missouri. The customer has requested that AmerenUE seek to provide master metering for this project, which will require a variance from the individual metering requirements of 4 CSR 240-20.050 and Section II.K. Non-Standard Service of the Company's Schedule 5 – Schedule of Rates for Electric Service. The customer is the St. Louis Housing Authority.

4. The project consists of rehabilitating a ten floor high-rise apartment building, originally constructed in 1971, to consist of 99 one and two-bedroom units for qualifying low to moderate income persons, both elderly and younger disabled (physically or mentally challenged) tenants. The building was originally constructed as conventional low income housing specifically for elderly residents. This building currently continues to operate in that capacity with the exception of additionally allowing residency to disabled populations as mandated by federal regulation. This rehabilitation will include a complete gutting of floors two through ten, the removal of most of the existing interior walls and finishes and, also, the removal of the existing mechanical, plumbing and electrical systems. All living units will include new kitchens, cabinets, appliances, bathroom and fixtures, closets and doors. All floor, wall and ceiling finishes within the

units will be new. Each living unit will include new electrical systems. Heating, ventilation, and air conditioning (HVAC) for the all the apartments will be provided by two gas fired boilers and an electric drive centrifugal chiller/cooling tower with pumps which circulate hot water/chilled water through thermostatically controlled fan coil units in each apartment. New fire sprinkler and alarm systems will protect all living units and common areas. Each unit will be connected to an emergency call system.

5. The customer has requested that one meter be installed to serve the building and, as a result, would 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 all other use would be required. As the majority of the use of electricity (HVAC) at this facility is somewhat central or common in nature and would be on the house meter, individual metering of each apartment would be of little benefit from an energy conservation perspective. Such metering would only increase initial construction costs and obstruct the intentions of the customer to provide “worry free”, affordable housing for the subject residents. In addition, the United States Department of Housing and Urban Development will subsidize the utility costs to be paid. If this variance is approved, this facility will be billed on the Company's 3(M) rate.

6. AmerenUE estimates that individually metering each unit versus master metering would result in additional expenditures of approximately \$750 per apartment. The customer estimates savings of approximately \$295,500 if the variance is approved. AmerenUE supports the customer's request for the metering of this project because of the overall cost-benefits.

7. The granting of this variance should not affect any other public utility.

WHEREFORE, for the foregoing reasons, Union Electric Company, on behalf of the customer, respectfully requests a variance from the individual metering requirement of 4 CSR 240-20.050 and Section II.K. Non-Standard Service of the Company's Schedule 5 – Schedule of Rates for Electric Service to allow master metering for the West Pine apartment building in St. Louis, Missouri.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

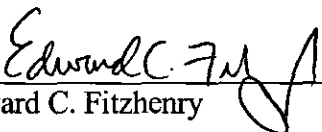
By Edward C. Fitzhenry
One of Its Attorneys

Edward C. Fitzhenry
Associate General Counsel
Joseph H. Raybuck
Managing Assistant General Counsel
Ameren Services Company
1901 Chouteau Avenue
P.O. Box 66149 (M/C 1310)
St. Louis, Missouri 63166-6149
(314) 554-3533 (ecf)
(314) 554-2976 (jhr)
(314) 554-4014 (fax)

VERIFICATION

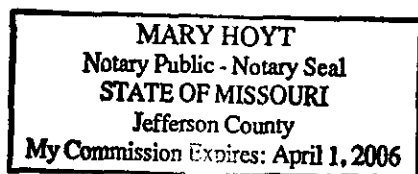
STATE OF MISSOURI)
) SS.
CITY OF ST. LOUIS)

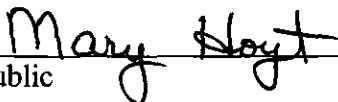
I, Edward C. Fitzhenry, an attorney for Union Electric Company, being duly sworn upon my oath, do hereby state that I have read the foregoing document and that the facts stated therein are true and correct to the best of my knowledge, information and belief, and that I am authorized to file such document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



Edward C. Fitzhenry

Subscribed and sworn to before me this 28th day of July, 2003.

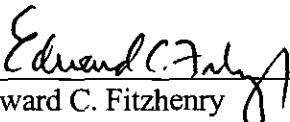




Notary Public

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the Staff of the Missouri Public Service Commission and Office of Public Counsel, by first class mail, postage prepaid, on this 28th day of July, 2003.



Edward C. Fitzhenry