

Exhibit A

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

Application of Union Electric Company,)
d/b/a AmerenUE, for a Metering Variance)
to serve Crestview Senior Living.)

Case No. EE-2006-0524

AMERENUE'S FIRST AMENDED APPLICATION FOR VARIANCE

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

1. AmerenUE 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).

2. There is already on file with the Commission a certified copy of the Company's Restated Articles of Incorporation (Case No. EO-96-431), a Certificate of Corporate Good Standing (Case No. EF-2003-0514), and a copy of Company's Fictitious Name Registration as filed with the Missouri Secretary of State's Office (Case No. GO-98-486). These documents are incorporated herein by reference and made a part hereof for all purposes.

3. Other than cases docketed at the Commission, AmerenUE has no pending actions or final unsatisfied judgments or decisions against it from any state or federal court or agency within the past three years which involve customer service or rates.

4. AmerenUE has no annual report or assessment fees that are overdue.
5. 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

Project Details

6. The Crestview Senior Living (Crestview) project is to be located at 8800 Watson Road, Crestwood, Missouri. Ground has not yet been broken for this project. A detailed description of this project is Attachment A to this Amended Application. Generally, the facility is a specialized facility designed for the care of its elderly, infirm or disabled residents.

7. The average age of the residents at the Crestview facility will be approximately 83 years of age.

8. Incidental Activities of Daily Living will be provided at the Crestview facility, evidenced by the multiple programs and services provided. These include providing all meals, staffed activity programs, exercise programs, a bus for transportation, facility and unit maintenance, weekly housekeeping, laundry, and the payment of trash, water, gas and electricity bills. Additionally, home health services will be available as needed.

9. The Crestview facility has been specifically designed to accommodate the elderly, infirm or disabled. These accommodations include a 24 hour emergency call system in each unit, 24 hour staffing, multiple elevators to living floors, automated entry doors and full accessibility both inside and outside of the facility.

10. Communal dining is provided for all residents. There will be a commercial kitchen and single dining room designed to accommodate all residents simultaneously. All meals are provided as part of the monthly rental rate.

11. This facility will have significant communal living areas as evidenced by the 32% of the gross building area which is common space. These common spaces include the communal dining room, private dining room, living room, library, theater, physical therapy, game room, meeting rooms, coffee shop, computer area, and country store.

12. The Crestview facility will consist of 132 total units. These units are relatively small, with sizes ranging from 400 square feet studios to 975 square feet two-bedroom units.

Cost Savings

13. Crestview has requested that a single master meter be installed to serve the building. Although each unit will be served by an individually controlled HVAC unit, Crestview will be responsible for the payment of the utility bills regardless of whether the project is master metered or individually metered. Accordingly, individual metering will only increase initial construction costs.

14. Service taken at this new facility will be billed on AmerenUE's Large General Services tariff. Billing on this rate results in a ten percent energy savings to the Crestview facility. This savings will not be available if individual metering is required because in that circumstance AmerenUE's tariffs would require billing at higher rates under AmerenUE's Residential Service tariff.

15. AmerenUE estimates that individually metering each unit versus master metering would result in additional AmerenUE expenditures of approximately \$90 per apartment, or

\$12,000 in total. The customer estimates a savings of approximately \$355,000 in construction and design costs if the project is master metered.

16. Finally, AmerenUE would note that because Crestview will pay the utility bills regardless of whether the facility is master metered or individually metered, the residents would not see the results of any conservation efforts.

Variance Considerations

17. The Commission has previously granted the variance requests of Brookview Group Communities (Case No. EE-2004-0267) and River's Edge Properties, LLC (Case No. EE-2004-0268). Both cases were consolidated on May 12, 2004, with Case No. EE-2004-0267 named as the leading case. These properties are factually very similar to the Crestview facility.

18. Initially, the Commission's Electric Meter Variance Committee recommended denial of both the Brookview Group and River's Edge Properties Applications. However, after consultation with all parties, it later determined that it was possible to distinguish independent living facilities from other multiple occupancy residential buildings. Staff's Suggestions in Support of Unanimous Stipulation and Agreement, filed on October 13, 2004, set forth six distinguishing characteristics which formed the basis for Staff to ultimately reach a Unanimous Stipulation and Agreement in both cases. Staff indicated that, if the Commission approved the Stipulation and Agreement, the Variance Committee would use this list in making appropriate and consistent recommendations concerning future variance applications.

19. The six characteristics include:

- (1) The average age of the residents is well over 65 years, or the residents are physically or mentally impaired or disabled;
- (2) The facility makes available assistance with Incidental Activities of Daily Living;
- (3) The facilities have special design features to accommodate the elderly, infirm or disabled;

- (4) Communal dining is provided to residents;
 - (5) Communal living areas make up a major portion of the facility; and
 - (6) The individual units are relatively small.
- Staff Suggestions in Support of Unanimous Stipulation and Agreement, October 13, 2004, pp. 3-4.

20. AmerenUE believes that the Crestview facility meets each characteristic and should properly be considered an independent living facility as distinguished from other multiple occupancy residential buildings. This is evidenced by the facts recited in paragraphs 7 through 12 above. It is clear that the Crestview facility is a specialized facility designed for the care of its elderly, infirm or disabled residents.

21. AmerenUE believes there is no social policy or financial benefit from requiring individual metering of this facility. Indeed, to do so would only increase the costs of construction and the monthly cost of electricity to the customer.

WHEREFORE, for the above stated reasons, AmerenUE, 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 Crestview Senior Living building in Crestwood, Missouri.

Dated: July 27, 2006

Respectfully submitted,

SMITH LEWIS, LLP

/s/ James B. Lowery

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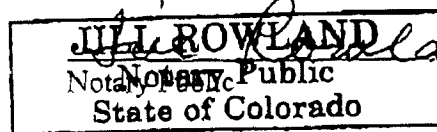
VERIFICATION

STATE OF Colorado)
) SS.
CITY OF Denver)

I, John A. Brewer, Senior Vice President of Development and Acquisitions, Spectrum Acquisitions Partners, the developer of the Crestview facility which is the subject of the foregoing First Amended Application for Variance, being duly sworn upon my oath, do hereby state that I have read the foregoing document and that the facts stated therein and those contained within Attachment A are true and correct to the best of my knowledge, information and belief.


John A. Brewer

Subscribed and sworn to before me this 27th day of July, 2006.



VERIFICATION

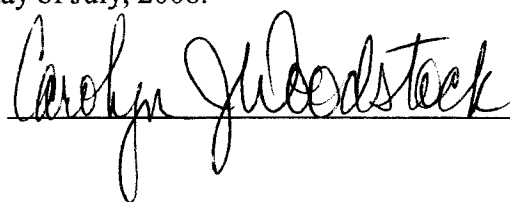
STATE OF MISSOURI)
) SS.
CITY OF ST. LOUIS)

I, Richard J. Mark, Senior Vice President of Union Electric Company d/b/a AmerenUE,
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

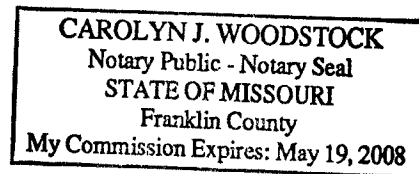


Richard J. Mark

Subscribed and sworn to before me this 27th day of July, 2006.



My Commission Expires: May 19, 2008



CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing AmerenUE's Application for Intervention was served via electronic mail (e-mail) or via regular mail on this 28th day of July, 2006, on:

Office of the General Counsel
Missouri Public Service Commission
Governor Office Building
PO Box 360
Jefferson City, MO 65102
gencounsel@psc.mo.gov

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/s/ James B. Lowery
James B. Lowery