

June 5, 2002

VIA FEDERAL EXPRESS

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, MO 65101



Re: Application of Union Electric Company d/b/a AmerenUE for a Variance
from 4 CSR 240-20.050 for Coronado LP's Coronado Project and
Motion for Expedited Treatment - Case No. _____

Dear Mr. Roberts:

Enclosed for filing on behalf of Union Electric Company, d/b/a AmerenUE, in the
above matter, please find an original and eight (8) copies of its **Application of
Union Electric Company d/b/a AmerenUE for a Variance for Coronado LP
and Motion for Expedited Treatment.**

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.

Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read "James J. Cook", is written over the typed name and title.

James J. Cook
Managing Associate General Counsel

JJC/vww

Enclosures

cc w/encl: Office of Public Counsel

16049

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

Application of)	
Union Electric Company)	
for a Variance from 4 CSR 240-20.050 for)	Case No. _____
Coronado LP's Coronado Project)	

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, 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. EA-87-105), 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:

James J. Cook
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 herein, the Company seeks a variance from the individual metering requirement of 4 CSR 240-20.050(2) for Coronado LP's Coronado Place project located at 3701 Lindell Boulevard in St. Louis, Missouri. Coronado LP has requested that AmerenUE seek to provide master metering for this project, which will require a variance from 4 CSR 240-20.050.

4. The project consists of the redevelopment of a vacant hotel, being converted into 165 student apartments above the first floor. Commercial and retail space will be on the first floor of the building.

5. Coronado LP has requested that one meter be installed for the residential portions of the building. Coronado LP will be responsible for the payment of the bills for each apartment. This service will be billed on the Company's 3(M) rate. The commercial and retail facilities will be separately metered and billed.

6. Coronado LP estimates that individually metering each unit versus master metering would result in additional expenditures of approximately \$1,250,000.

7. The Commission's rules allows for an exception to the requirement of individual metering for multiple occupancy buildings, and states that "separate metering will not be required...for transient multiple-occupancy buildings and mobile home parks – for example, hotels, motels, dormitories, rooming houses...." 4 CSR 240-20.050. The Coronado Place project is intended as, and is marketed as student housing similar to dormitories. It is located adjacent to St.

Louis University, and a copy of a waiting list of students who have requested to move into the facility is attached hereto as Attachment 1.

8. If the facility were clearly a dormitory, a variance would not be required. The Company believes that this project is a dormitory-like project that exhibits many of the indicia of a dormitory – particularly in that it is being developed specifically as a “transient multiple-occupancy building,” as opposed to a traditional apartment, where the owner would normally prefer non-transient occupants. However, because of the apartment like layout of the facility, the Company was concerned that the “dormitory” designation might not be fully accurate.

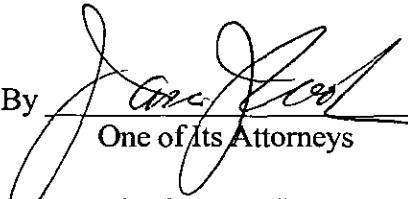
9. However, because of the overall intent of the developer to market to students, the location of the project directly adjacent to and a part of the St. Louis University community, and the importance of this project to the St. Louis community in general, the Company has agreed to file for and support this request for a variance from the individual metering requirements reflected in the Commission’s metering rule. The building, which has been vacant for 17 years, is located at the edge of Grand Center, an area that St. Louis has struggled to redevelop. State and local officials have expressed enthusiastic support for the project. Letters of support are attached as Attachment 2.

10. 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 to allow master metering for Coronado LP’s Coronado Place project in St. Louis, Missouri.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

By 
One of its Attorneys

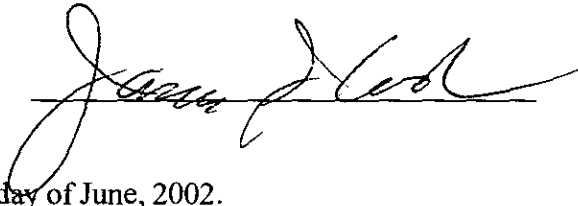
James J. Cook, MBE #22697
Ameren Services Company
1901 Chouteau Avenue
P.O. Box 66149 (M/C 1310)
St. Louis, Missouri 63166-6149
(314) 554-2514
(314) 554-4014 (fax)

Dated: June 5, 2002

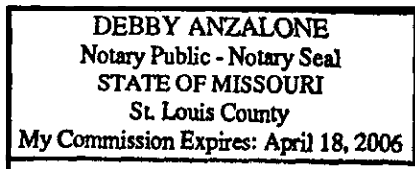
VERIFICATION

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

I, James J. Cook, 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.

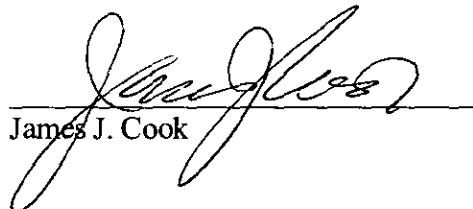


Subscribed and sworn to before me this 5th day of June, 2002.


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 June, 2002.


James J. Cook

CORONADO PLACE

WAITING LIST			
2BD			WENTE-DITCH
2/2BD			KRON-DANIELS-BAKER
3BD/LOFT			LINTZENICH-HENGELMAN-WEBER
PENT			MARTINEZ-RATEL-THOMAS-WORICK
2/1BD			CABLE-COVERSTONE-PETERS
2/1BD			REED-PICKETT
2/1BD			SMITH-SCHULTZ-STEICHEN
3/2BD			DUST-FOPPE-MINITER
3/2BD			CLEVER-PURCELL-VATTEROTT
3/2BD			ELMORE-HATLEY-KAZI-MCKENNA
2/1BD			LECOMPTE-PICKETT-REED
2/1BD	UNIT A		ROSELMAN-HURT-BONNELL
2/1BD			MCMANUS-GENTILCORE-FELDMAN
3/2BD		highest	PUNO-PETERSON-FANDERSclose to Melenbrink/Reckert
2/1BD			CLEMENT-DARABESEK
2/1BD			HARTER-OSMAN
3/2BD	UNIT B	12th	SANDERS-MASTRAPASQUA-BETTON
2/1BD	UNIT A	12th	KENNOY-WELSH/COLE-KELAHAN-GREEN
3/2BD	ADA	2nd	MAGILL-MOORE-WILLON
2/1BD			TOENNIS-LABERMEIER-VANOSCH
2/1BD			REARDON-MCALEAVEY
2/1BD		highest	RECKERT-MELENBRINK (BENTON-MUELLER)
2/1BD			SCHLOTTE-BROPHY(schlotte canceled transfer)
2/1BD	UNIT A	11-13th	MCCONKEY-NOTTKE
2/1BD			BALICK-STEPHENS-TIERNEY
2/1BD			FRY-UEBE same floor as Kelly/Daniels
3/2BD	UNIT B		STOERZBACH-ROYKHMNA-ZERRUSEN
2/1BD	UNIT C	highest	DANIELS-I Same floor as Uebeihor
2/1BD			KING-NUNAN
2/1BD			BALL-KOZAK
3/2BD			FISCHER-SAUER-GIBBAR-GANTHER
2/1BD			ALVAREZ-BARRIO-trans from 307E
2/1BD			MURRAY-LEBLANC-CONTRERA
LOFT			WALSH-GLASS-GANGEL-DILISIO
1-Feb			MCCLEAN-HEAD-WATT
3/2BD			GESSERT-WOFFORD-BICKEL (LIN/VAN)
2/1BD	UNIT C		JOKERST-FRANK
3/2BD			CRANE-FOLEY-DUCHEK
3/2BD			BLAKEMORE-MCKENNA-MCKINNEY-TRAYNOR
3/2BD			HERRAN-BARNES-TRENDA-SMITH
3/2BD			GRATTPM-THORMAN-KOMOROSKI
2/1BD			EHRJARDT-NOYES
1-Feb			CONROY-COVERT
2/1			BURR-HOFMEISTER
2BD			EHRHARDT-NOYES 9-Apr
3BD			GRATTON-THORMAN-KOMOROSKI 9-Apr

2BD			PETERS-NOELKE	5-Apr
3BD			JERRAM-BARNES-TREDA-SMITH	10-Apr
2BD			GRIMSLEY-STEWART-KIESOW	8-Apr
2BD			BRIAN-KOPECK-CROWLEY	15-Apr
2BD			MCCLEAN-WATT-HEAD	9-Apr
3BD			S80IE-CLARK-VILLA-GORDON	5-Apr
3BD			BRESLIN-CRRAN-CRONIN	15-Apr
2BD			DAWSON-SULLIVAN	17-Apr
3BD			LUETKEMEYER-CABAN-NICOLOFF	4-Apr
2bd			CHLYSTA-SPERMAYER	17-Apr
3BD			GREEN-PARSONS-WORICK	17-Apr
			PENTHOUSE - LOFT	
1			WALSH-GLASS-GANGEL-DELISIO	
2			GESSERT-WOFFORD-BICKEL-TYCAST	
			3 BEDROOM	
1			MARTINEZ-PATEL-THOMAS	
2			LINTZENICK-HENGELMAN-WEBER	
3			SANDERS-MASTRAPASQUA-BETTON	
4			FOPPE-DUST-MINITER	
5			CLEVER-PURCELL-VATTEROTT	
6			ELMORE-HATLEY-KAZI-MCKENNA	
7			MAGILL-WILLEN-MOORE	
8			PETERSON-PUNO-FANDERS-	
9			BLACKMORE-MCKENNA-MCKINNEY-TRAYNOR	
10			STOERBACH-ROYKHMANN-ZERUSEN	
11			GIBBAR-SAUER-GATNER-FISCHER	
12			SCHAEFER-CRANE-FOLEY-DUCHEK	
13			GRATTON-THORMAN-KOMOROSKI	
14			HERRAN-BARNES-TREDA-SMITH	
15			SILKE-CLARK-VILLA-GORDON	
16			BRESLIN-CURRAN-CRONIN	
17			GREEN-PARSONS-WORICK	
			2 BEDROOM	
1			WENTE-DITCH	
2			DANIELS-KRON-BAKER	
3			SMITH-SCHUTZ-SMITH	
4			CABLE-KOSTECKA-PETERS	
5			PICKETT-REED-LECOMPT	
6			ROSELMAN-BONNELL-HURT	
7			CLEMENT-DARABESEK	
8			GENTILCORE-MCMANUS-FELDMAN	
9			HARTER-OSMAN	
10			ALTHUKAIR-ALAMRO	
11			KENNOY-WELSH/COLE-KELAHAN-GREEN	
12			TOENNIS-VANOSCH-LABERMEIER	
13			REARDON-MCALEAVEY-BLANCO	



CAPITOL OFFICE
State Capitol • Room 425
201 West Capitol Avenue
Jefferson City, MO 65101
Tele: 573-751-3599
FAX: 573-751-0266

PATRICK DOUGHERTY
STATE SENATOR
DISTRICT 4

COMMITTEES:
AGING, FAMILIES AND MENTAL HEALTH
COMMERCE AND ENVIRONMENT
INTERSTATE COOPERATION
LABOR AND INDUSTRIAL RELATIONS
PENSIONS AND GENERAL LAWS

4031 Parker Avenue
St. Louis, MO 63116
314-772-1948
pat_dougherty@senate.moc.mo.us

November 1, 2001

Joe Driscoll, Director
Department of Economic Development
Harry S Truman Building
Jefferson City, MO 65101

Dear Joe:

I would like to join Congressman Richard Gephardt, Congressman Lacy Clay, Mayor Francis Slay, former mayor Vince Schoemehl and Treasurer Nancy Farmer in supporting a major development project in St. Louis known as Coronado Place. This project is ready to move but for final notification of approval of brownfield credits from Department of Economic Development. This will be a significant investment in downtown St. Louis with a total capital investment of \$30 million, not to speak of the many jobs that would be created. Considering the today's economy, individuals willing to invest substantial amounts of money and willing to invest in our region -- the biggest economic engine in the state -- need to be supported.

I urge you to sign off on the approval of these tax credits.

Sincerely,

Pat Dougherty
State Senator
District 4

PD:cb

RICHARD A. GEPHARDT
THIRD DISTRICT, MISSOURI
DEMOCRATIC LEADER

Congress of the United States
House of Representatives
Washington, DC 20515-2503

October 30, 2001

WASHINGTON OFFICE:
1235 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-2503
PHONE: (202) 225-2871
email: gephardt@mail.house.gov
harpdrt@gephardt.house.gov

DISTRICT OFFICE:
11140 SOUTH TOWNE SQUARE
ROOM 201
ST. LOUIS, MO 63123
PHONE: (314) 894-3400

954 E. GANNON DR.
PO BOX 332
FESTUS, MO 63028
PHONE: (816) 217-8222

Mr. Joseph L. Driskill
Department of Economic Development
Truman State Office Building
P. O. Box 1157
Jefferson City, MO 65102

Dear Mr. Driskill:

Coronado Place, a major redevelopment project in St. Louis, is being held up pending receipt of a final notification of approval of Brownfield credits from the Missouri Department of Economic Development. I am writing to you in the hope that this final notification of approval might be expedited by you so that work can begin.

Coronado Place, L.P. has completed the process necessary to obtain approval of the Brownfield credits, and has also received letters of support from St. Louis Mayor Francis Slay, State Treasurer Nancy Farmer, and Vincent Schoemehl, President of Grand Center. It is agreed among all parties that the application had been processed prior to Governor Holden's comments at a press conference about reducing the Tax Credit budget, which is apparently the only grounds upon which the notification of approval is being withheld.

The Brownfield credits are crucial to the Coronado Place project, and I urge you to release the final notification of approval so that work might begin.

Sincerely,



Richard A. Gephardt
House Democratic Leader

cc: Governor Bob Holden



OFFICE OF THE MISSOURI STATE TREASURER
NANCY FARMER, TREASURER

September 5, 2001

Mr. Amrit Gill
Coronado Place, L.P.
3701 Lindell
St. Louis, MO 63108

Dear Amrit:

As always, it was a pleasure visiting with you in late August. Barb and I both enjoyed touring your most recent project and learning more about your various endeavors.

As we discussed, B.K. in my Jefferson City office and Barb in the St. Louis office are doing what they can to learn more about the status of your Brownfield tax credit application. By now, Barb should have also looked further into the SB 20 Neighborhood Preservation Tax Credit program as it relates to your anticipated project at the Carleton Apartments.

I believe the restoration and development of the Coronado Building is a much-needed project and will greatly enhance the area surrounding St. Louis University. I support your efforts and will be sure to tout its importance to others here in Jefferson City.

Again, it was nice seeing you. Please let me or Barb know if there is anything else we can do for you.

Sincerely,

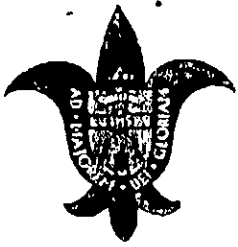
Nancy Farmer
Missouri State Treasurer

KANSAS CITY BRANCH OFFICE
KANSAS CITY STATE OFFICE BLDG., ROOM 112
615 EAST 13TH STREET
KANSAS CITY, MO 64106
(816) 889-3172
FAX (816) 889-3174

STATE CAPITOL - JEFFERSON CITY
P.O. Box 210
JEFFERSON CITY, MO 65102
(573) 751-2411
FAX (573) 751-9443
RELAY MO/DEAF TTY (800) 735-2966

ST. LOUIS BRANCH OFFICE
WAINWRIGHT STATE OFFICE BLDG., ROOM 270
111 NORTH 7TH STREET
ST. LOUIS, MO 63101
(314) 340-7858
FAX (314) 340-7858

Attachment 2



221 North Grand Blvd.

St. Louis, MO 63103

Phone: 314-977-8173

Fax: 314-977-3715

SAINT LOUIS
UNIVERSITY

Office of the Vice President
for Facilities Management
and Civic Affairs

November 1, 2001

Mr. Joseph L. Driskill
Missouri Department of Economic Development
Truman State Office Building
P. O. Box 1157
Jefferson City, Missouri 65102

Dear Mr. Driskill:

On behalf of Saint Louis University, I wish to express our support on the renovation of Coronado Place. As a neighboring institution, I am excited that there are such plans. It has been vacant for too long.

I have met with Coronado developers and understand that they are awaiting approval of Brownfields credits from the Missouri Department of Economic Development. I urge you to give approval so that the renovation work may proceed without any delay.

I encourage developers to reinvest in old buildings, especially those that are a part of St. Louis history. It would further help revitalize the midtown area and the city overall, while preserving St. Louis history. I only hope other investors would follow.

Thank you for your time.

Sincerely,

Kathleen Brady
Vic President

cc: Philip Estep, Coronado Place
Amrit Gill, Coronado Place

WM. LACY CLAY
111 DISTRICT, MISSOURI

COMMITTEES
FINANCIAL SERVICES
GOVERNMENT REFORM
Ranking Member,
SUBCOMMITTEE ON CENSUS
Web Site: www.house.gov/clay/
E-Mail: www.house.gov/wrlcwp/

Congress of the United States
House of Representatives
Washington, DC 20515-2501

612 Cannon House Office Building
Washington, D.C. 20515
(202) 225-2406
(202) 225-1725 Fax

625 N. Euclid, Ste. 200
St. Louis, Missouri 63108
(314) 367-1970
(314) 337-1341 Fax

3525 Page Boulevard
St. Louis, Missouri 63114
(314) 809-0349
(314) 427-6210 Fax

October 30, 2001

Mr. Joseph Driskill, Director
Missouri Department of Economic Development
P.O. Box 1157
Jefferson City, MO 65102

Dear Mr. Driskill:

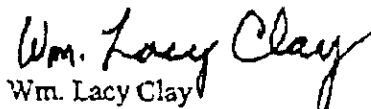
This is to register my wholehearted support for the Coronado Apartments, L.P. proposal to renovate the Coronado Hotel site in the City of St. Louis. The Coronado L.P. has proposed an excellent rehabilitation project that will restore a significant architectural structure while creating much needed new housing, business and job opportunities in St. Louis.

The Coronado Hotel site has been abandoned for many years. Past redevelopment efforts have been stymied by the site's hazardous waste conditions. Fortunately, with the help of Brownfields tax credits, a cost effective remediation of this structure can be achieved. The Coronado Place project has been approved for State Historic Preservation Credits and the L.P. has obtained a loan commitment of \$25 million for this redevelopment in anticipation of the Brownfields tax credit approval.

I urge you to issue a letter of approval for Brownfields tax credits to the Coronado Place, L.P. without further delay. This historic rehabilitation project promises to be of tremendous value to the St. Louis community and I strongly believe it warrants the support of the State of Missouri.

Thank you for your consideration of my interests. Please do not hesitate to let me know if we might discuss this subject in further detail.

Sincerely,


Wm. Lacy Clay
Member of Congress

WLC/mlb

PRINTED ON RECYCLED PAPER

ROBERT HILGEMANN
State Representative
District 64

HOME ADDRESS
4131 Blaine Ave.
St. Louis, MO 63110
Tel: (314) 777-4718



CAPITOL OFFICE
State Capitol
201 West Capitol Avenue
Jefferson City, MO 65101-6806
Tel: (573) 751-1400
FAX: (573) 522-5852
E-mail:
rhilgema@services.state.mo.us

**MISSOURI
HOUSE OF REPRESENTATIVES**

November 26, 2001

Mr. Joseph Driskill, Director
Missouri Department of Economic Development
P.O. Box 1157
Jefferson City, MO 65102

Dear Mr. Driskill:

This letter is an endorsement of the planned renovation of the Coronado Hotel by Coronado Apartments, L.L.C.

The Coronado Hotel site has been abandoned for many years. Past redevelopment efforts have been stymied by the site's hazardous waste conditions. Fortunately, with the help of Brownfields tax credits, a cost-effective remediation of this structure can be achieved. The Coronado Place project has been approved for State Historic Preservation Credits and the L.P. has obtained a loan commitment of \$25 million for this redevelopment in anticipation of the Brownfields tax credit approval.

I urge you to continue working to establish a plan so that you can issue a letter of approval for Brownfields tax credits to the Coronado Place, L.P. This historic rehabilitation project promises to be of tremendous value to the St. Louis community and I strongly believe it warrants the support of the State of Missouri.

Thank you for your consideration of my interests. Please do not hesitate to let me know if we might discuss this subject in further detail.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Hilgemann", is written over a horizontal line.

Robert Hilgemann
District 64

RH/wd

COMMITTEES
Vice Chair - Motor Vehicle & Traffic Regulations
Appropriations - Social Services & Corrections - Children, Families and Health - Utilities Regulation