

FILED³

JAN 31 2000

January 28, 2000

VIA FEDERAL EXPRESS MAIL

Missouri Public
Service Commission

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



EE - 2000 - 465

Re: Application of Union Electric Company d/b/a AmerenUE
for a Variance for NBA Hylton Point II Case No. _____

Dear Mr. Roberts:

Enclosed for filing are an original and fourteen (14) copies of an Application of Union Electric Company d/b/a AmerenUE for a Variance for NBA Hylton Point II.

Kindly acknowledge receipt of this filing by stamping as filed a copy of this letter and returning it to the undersigned in the envelope provided.

Sincerely,

A handwritten signature in black ink, appearing to read "WJN".

William J. Niehoff
Attorney-at-Law

WJN:rd
enclosures
cc w/encl: Office of Public Counsel

FILED³

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

JAN 31 2000

Missouri Public
Service Commission

Application of Union Electric Company
for a Variance for NBA Hylton Point II

)
) Case No. EE-2000-465

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, gas and steam heating 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:

William J. Niehoff
Attorney
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 the NBA¹ Hylton Point II project located at 933 Belt in St. Louis, Missouri. The NBA 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 constructing a new apartment building to consist of 60 one-bedroom units for subsidized elderly housing.

5. The NBA has requested that one meter be installed to serve the new building. The NBA will be responsible for the payment of the bills for each apartment; therefore, individual metering will only increase initial construction costs and obstruct the intentions of the NBA. In addition, the Department of Housing and Urban Development will subsidize the rent to be paid. This new building 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 \$280 per apartment. The NBA estimates savings of approximately \$16,800 if the variance is approved. AmerenUE supports the NBA's request for the metering of this project because of the overall cost-benefits. It also believes this request to be supported by the Commission Staff.

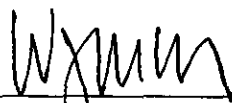
7. The granting of this variance should not affect any other public utility.

¹ The National Benevolent Association of the Christian Church (Disciples of Christ)

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 the NBA Hylton Point II new apartment building in St. Louis, Missouri.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

By 
One of Its Attorneys

William J. Niehoff, MBE #36448
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)

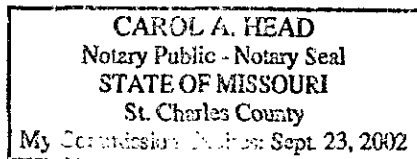
VERIFICATION

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

I, William J. Niehoff, 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.

WJN

Subscribed and sworn to before me this 28 day of January, 2000.



Carol A. Head
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 28 day of January, 2000.

WJN
William J. Niehoff