BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Application of Union Electric Company)		
for a Variance)	Case No	
for Parkview 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 Parkview Apartment project located at 4451 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 constructing a refurbished apartment building originally constructed in 1972, to consist of 288 one-bedroom units and 7 bedroom efficiency 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. The original mechanical system consisted of a gas fired hot water, hi-rise loop system with gas fired boiler domestic water system. The remodeling changes this configuration to individual electric thru wall packaged thermal heating / ac units in each apartment and a high efficiency split system forced air hot water boiler system to accommodate all ground

floor non-dwelling spaces. Fire safety systems including sprinkler systems and fire alarm systems are replaced to meet current code requirements. All interior floor finishes, bathroom fixtures, cabinets, lighting fixtures are replaced. The original electrical system was master metered and due to interior space constraints as well as significant cost is intended to remain master metered, however, all building electrical distribution systems are to be replaced including building switchgear.

- 5. The customer has requested that one meter be installed to serve the building. The customer will be responsible for the payment of the bills for electric service for each apartment. Absent approval of the variance request, individual metering and a "house" meter will be required which will only increase initial construction costs and obstruct the intentions of the customer to provide 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. This new building will be billed on the Company's 3(M) rate, assuming the variance is approved.
- 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 Parkview apartment building in St. Louis, Missouri.

Respectfully submitted,

UNION ELECTRIC COMPANY d/b/a AmerenUE

Edward C. Fitzhenry

Licensed: State of Illinois

ARDC #6180218

Associate General Counsel

Ameren Services Company

1901 Chouteau Avenue

P.O. Box 66149 (M/C 1310)

St. Louis, Missouri 63166-6149

(314) 554-3533

(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 swom 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 Aday of August, 2003.

DEBBY ANZALONE Notary Public - Notary Seal STATE OF MISSOURI St. Louis County

My Commission Expires: April 18, 2006

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 / day of August, 2003.