BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Application of Union Electric Company,)	
d/b/a AmerenUE, for a Metering Variance)	Case No.
to Serve Crestview Senior Living.)	

AMERENUE'S APPLICATION FOR VARIANCE

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. 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"). 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:

Thomas M. Byrne 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 one of its customers, Crestview Senior Living, 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 Crestview Senior Living project located at 8800 Watson Road, Crestwood, Missouri. Ground has not yet been broken for this project.
- 4. The retirement project will consist of 132 total units with sizes ranging from 400 square feet studios to 975 square feet two-bedroom units. The average age of the residents will be approximately 83 years. Each unit will be served by an individually controlled HVAC unit and a common, gas fired hot water system.
- 5. The customer has requested that a single master meter be installed to serve the building. The customer will be responsible for the payment of the bills for each apartment; therefore, individual metering would only increase initial construction costs. This new building will be billed on the Company's large general services rate.
- 6. This facility is specially designed to accommodate the elderly, infirm or disabled, as evidenced by 24-hour emergency call system in each unit, 24-hour staffing, multiple elevators to living floors, automated entry doors, and full accessibility of the facilities. This facility has 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.
- 7. 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 savings of approximately \$355,000 in construction and

design costs if the project is master metered. A ten percent (10%) energy savings will be achieved as a result of the structure of the applicable service rate (Large General Service versus Residential Service Rate) if the variance is approved. AmerenUE supports the customer's request for the master metering of this project because of the overall cost-benefits.

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

WHEREFORE, for the foregoing 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.

Respectfully submitted,

UNION ELECTRIC COMPANY d/b/a AmerenUE

One of Its Attorneys

Thomas M. Byrne, #33340

Managing Assoc. General Counsel

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 $\underline{tbyrne@ameren.com}$

Dated: June 27, 2006

VERIFICATION

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

I, Steven R. Sullivan, Senior Vice President, General Counsel and Secretary for 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, and that I am authorized to file such document on behalf of AmerenUE.

Steven R. Sullivan

Subscribed and sworn to before me this 26th day of June, 2006.

CAROLYN J. WOODSTOCK
Notary Public - Notary Seal
STATE OF MISSOURI
Franklin County

My Commission Expires: May 19, 2008

Moley Jude de Tock 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 $\partial \mathcal{T}$ day of June, 2006.

Thomas M. Byrne