

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

In the Matter of the Application of)
reStart Housing Services, Inc. for a)
Variance from 4 CSR 240-20.050)
Regarding Individual Electric Meters.)

Case No. EE-2015-0177

ELECTRIC VARIANCE COMMITTEE RECOMMENDATION TO GRANT VARIANCE

COMES NOW the Staff of the Missouri Public Service Commission and files the Electric Variance Committee’s memorandum, attached as Appendix A, in which the committee, for the reasons set forth in its memorandum, recommends that the Commission (1) find that with respect to the portion of electric energy used by the occupants of each of the 15 residential units of the 14-unit plus full time, live-in residential manager, apartment building at 7540 Washington, Kansas City, Missouri, the long-run benefits to the electric consumers of separate metering do not exceed the costs of purchasing and installing separate meters for each residential unit, (2) grant a variance from 4 CSR 240-20.050 that allows Kansas City Power & Light Company to provide master-metered electric service to reStart Housing Services, Inc.’s 14-unit apartment building at 7540 Washington, Kansas City, Missouri, and (3) order Kansas City Power & Light Company to add this variance to the list of variances on P.S.C.MO. No. 2, Sheet No. 1.71 in its tariff.

Respectfully submitted,

/s/ Nathan Williams

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or by electronic mail to all counsel of record on this 17th day of February, 2015.

/s/ Nathan Williams

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. EE-2015-0177, Kansas City Power & Light Company

FROM: Electric Meter Variance Committee

/s/ Dustin Allison
Dustin Allison, Acting Public Counsel

/s/ Nathan Williams
Nathan Williams, Deputy Staff Counsel

/s/ Dan Beck
Daniel I. Beck, Manager of Engineering Analysis in the Tariff, Safety,
Economic and Engineering Analysis Department in the Regulatory
Review Division of the Missouri Public Service Commission

/s/ Robin Kliethermes
Robin Kliethermes, Regulatory Economist in the Economic Analysis
Section of the Regulatory Review Division of the Missouri Public Service
Commission

SUBJECT: Recommendation for approval of a variance from the individual electric
metering requirement for service to a new multiple-occupancy apartment
building being built at 7540 Washington, Kansas City, Missouri.

DATE: February 17, 2015

On or about January 29, 2015, reStart Housing Services, Inc. an application for a variance from the individual metering requirement of 4 CSR 240-20.050(2) for a new 14-unit, plus live-in manager, apartment building to be built at 7540 Washington, Kansas City, Missouri.

On February 10, 2015, Staff responded to reStart Housing's application and recommended that the Commission:

(1) find that with respect to the portion of electric energy used by the tenants of each residential unit of the 14-unit apartment building at 7540 Washington, Kansas City, Missouri, the long-run benefits to the electric consumers of separate metering do not exceed the costs of purchasing and installing separate meters for each residential unit, (2) grant a variance from 4 CSR 240-20.050 that allows Kansas City Power & Light Company to provide master-metered electric service to reStart Housing Services, Inc.'s 14-unit apartment building at 7540

Washington, Kansas City, Missouri, and (3) order Kansas City Power & Light Company to add this variance to the list of variances on P.S.C.MO. No. 2, Sheet No. 1.71 in its tariff.

Also on February 10, 2015, Kansas City Power & Light Company responded to reStart Housing's application and recommended the Commission "rely on section (4)(A) of 4 CSR 240-20.050 and indicate to reStart that it can build its facility without the need for individual meters."

The Electric Meter Variance Committee met on February 17, 2015, and unanimously determined that, except that there will be 15 residential living units in the new building, not 14, the Electric Meter Variance Committee concurs with the facts and analysis in Staff's February 10, 2015, pleading and in its recommendations, and incorporates the same herein by this reference.

As to the nature of the housing at the apartment building to be built at 7540 Washington, Kansas City, Missouri, reStart Housing has confirmed that, although the housing is permanent in nature and any HUD-qualified resident may live there, the apartment is being built as part of a program that is targeted to housing 18-24 year-old single young adults with disabilities who have aged out of foster care programs and who would likely otherwise become homeless; therefore, none of the exceptions of 4 CSR 240-20.050(4) apply. Those exceptions follow:

(4) For the purposes of carrying out the provisions of sections (2) and (3), the following exceptions apply and separate metering will not be required:

(A) For transient multiple-occupancy buildings and transient mobile home parks—for example, hotels, motels, dormitories, rooming houses, hospitals, nursing homes, fraternities, sororities, campgrounds and mobile home parks which set aside, on a permanent basis, at least eighty percent (80%) of their mobile home pads or comparable space for use by travel trailers;

(B) Where commercial unit space is subject to alteration with change in tenants as evidenced by temporary versus permanent type of wall construction separating the commercial unit space—for example, space at a trade fair;

(C) For commercial adjacent buildings;

(D) For that portion of electricity used in central space heating, central hot water heating, central ventilating and central air-conditioning systems;

(E) For buildings or mobile home parks where alternative renewable energy resources are utilized in connection with central space heating, central hot water heating, central ventilating and central air-conditioning systems; or

(F) For all portions of electricity in commercial units in buildings with central space heating, ventilating and air-conditioning systems.