One Ameren Plaza 1901 Chouteau Avenue PO Box 66149 St 1.0954 MQ 63166-6149 314623.3224014 (fax) JJCOKEAMEREN. COM

March 27, 2001

FILED

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### **VIA FEDERAL EXPRESS MAIL**

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



EE-2001-514

Re: Application of Union Electric Company d/b/a AmerenUE for a

Variance for Volunteers of America St. Louis Affordable Housing Corp.

Dear Mr. Roberts:

Enclosed for filing are an original and eight (8) copies of an Application of Union Electric Company d/b/a AmerenUE for a Variance for Volunteers of America St. Louis Affordable Housing Corp.

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.

Very truly yours,

James J. Cook

Managing Associate General Counsel

JJC/mlh Enclosures

cc w/encl:

Office of Public Counsel

# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI



Application of Union Electric Company	Missouri Public Servina Commissic	'n
d/b/a AmerenUE for a Variance for The Volunteers of America St. Louis	) Case No. <u>EE-2001-514</u>	
Affordable Housing Corporation	)	

### 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 One Ameren Plaza, 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:

James J. Cook
Managing Associate General Counsel
Ameren Services Company
One Ameren Plaza
1901 Chouteau Avenue
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 Volunteers of America St. Louis Affordable Housing Corporation ("VOA St. Louis") project located at 14<sup>th</sup> Street and Chouteau Avenue in St. Louis, Missouri. The VOA St. Louis 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 three new buildings for subsidized elderly housing.

  One building ("St. Louis VOA Elderly Housing) to consist of 30 one-bedroom apartments and 10 two-bedroom apartments. The second building ("VOA St. Louis Hope VI Limited Partnership) to consist of 61 one-bedroom apartments and 1 two-bedroom apartment. The third building ("VOA St. Louis Hope VI Community Center, Inc.) to consist of offices, resident recreation and meeting spaces, a library, a computer lab and mail boxes. This third building will also be a secure entry point for the residents.
- 5. The VOA St. Louis has requested that one meter be installed on each building. The VOA St. Louis 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 VOA St. Louis. In addition, the Department of Housing and Urban Development will subsidize the rent to be paid. The

two new apartment buildings will be billed on the Company's 3(M) rate, and the community center will be billed on the Company's 2(M) rate.

- 6. AmerenUE estimates that individually metering each unit versus master metering would result in additional expenditures of approximately \$280 per apartment. The VOA St. Louis estimates savings of approximately \$76,500 if the variance is approved. AmerenUE supports the VOA St. Louis' 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.

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 VOA St. Louis' new apartment buildings and community center in St. Louis, Missouri.

Dated March 27, 2001

Respectfully submitted,

UNION ELECTRIC COMPANY d/b/a AmerenUE

\_/

James J. Cook, MBE #22697

Managing Associate General Counsel

Ameren Services Company

One Ameren Plaza

1901 Chouteau Avenue

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

St. Louis, Missouri 63166-6149

(314) 554-2237

(314) 554-4014 (fax)

ijcook@ameren.com

#### **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 d/day of \_

 $\bigcirc$ 

DEBBY ANZALONE
Notary Public - Notary Seal
STATE OF MISSOURI
St. Louis County
My Commission Expires: April 18, 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 27<sup>th</sup> day of march, 2001.

James J. Cook