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Secretary/Chief Regulatory Law Judge

DANA K. JOYCE  
General Counsel

June 21, 2001

FILED<sup>3</sup>

JUN 21 2001

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

Missouri Public  
Service Commission

**RE: Case No. EE-2001-514 – In the Matter of the Application of Union Electric Company d/b/a/ AmerenUE For a Variance from the Commission's Rule Requiring Separate Metering for The Volunteers of America St. Louis Affordable Housing Corporation project located at 14<sup>th</sup> Street and Chouteau Avenue in St. Louis, Missouri.**

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of an **ELECTRIC METER VARIANCE COMMITTEE RECOMMENDATION**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Nathan Williams  
Associate General Counsel  
(573) 751-7489  
(573) 751-9285 (Fax)  
[nwilliams@mail.state.mo.us](mailto:nwilliams@mail.state.mo.us)

Enclosure  
cc: Counsel of Record

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

**FILED<sup>3</sup>**

JUN 21 2001

Missouri Public  
Service Commission

In the Matter of the Application of Union )  
Electric Company d/b/a AmerenUE For a )  
Variance from the Commission's Rule )  
Requiring Separate Metering for The )  
Volunteers of America St. Louis )  
Affordable Housing Corporation project )  
located at 14<sup>th</sup> Street and Chouteau )  
Avenue in St. Louis, Missouri. )

Case No. EE-2001-514

**ELECTRIC METER VARIANCE COMMITTEE RECOMMENDATION**

COMES NOW the Electric Meter Variance Committee of the Missouri Public Service Commission (Committee) and for its recommendation states:

1. In the attached Memorandum, which is labeled Appendix A, the Electric Meter Variance Committee recommends that the Missouri Public Service Commission issue an Order granting Union Electric Company d/b/a AmerenUE a variance from the separate metering requirement of 4 CSR 240-20.050 to allow master metering of the residential living units of The Volunteers of America St. Louis Affordable Housing Corporation project located at 14<sup>th</sup> Street and Chouteau Avenue in St. Louis, Missouri. The project consists of three new buildings for subsidized elderly housing. Two of the buildings will include apartments; the third will include offices, resident recreation and meeting space, a library, a

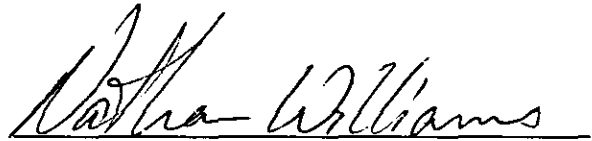
computer lab and mailboxes. The third building will also provide a secure entry point for the residents.

2. The Committee has determined that with respect to the portion of electric energy used by the residents of each unit of the project, the long-run benefits to the electric consumers of separate metering do not exceed the costs of purchasing and installing separate meters for each unit.
3. Although its initial application failed to comply with the requirements of 4 CSR 240-2.060(1)(K) and 4 CSR 240-2.060(L), in response to the Commission's order directing filing issued April 2, 2001, Union Electric Company, on April 6, 2001, supplemented its application to bring it into compliance with 4 CSR 240-2.060(1)(K) and 4 CSR 240-2.060(L).
4. Listing variances from 4 CSR 240-20.050 granted by the Commission to an electric utility in the tariff of that utility on file with the Commission would provide readily accessible public notice of these variances.

WHEREFORE the Electric Meter Variance Committee of the Missouri Public Service Commission recommends that the Commission grant the Application for Variance made by Union Electric Company d/b/a AmerenUE for The Volunteers of America St. Louis Affordable Housing Corporation project located at 14<sup>th</sup> Street and Chouteau Avenue in St. Louis, Missouri, and that the Commission also order Union Electric Company to file tariff sheet(s) to list the variances from 4 CSR 240-20.050 that the Commission has granted to it.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

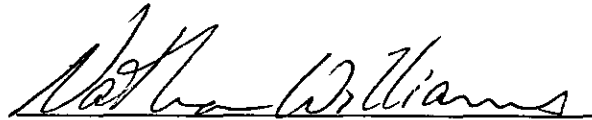
A handwritten signature in cursive script, reading "Nathan Williams", written over a horizontal line.

Nathan Williams  
Assistant General Counsel  
Missouri Bar No. 35512

Attorney for the  
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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 21<sup>st</sup> day of June, 2001.

A handwritten signature in cursive script, reading "Nathan Williams", written over a horizontal line.

**Service List for**  
**Case No. EE-2001-514**  
**Verified: June 21, 2001 (RR)**

**James J. Cook**  
Ameren Services Company  
One Ameren Plaza  
PO Box 66149 (MC 1310)  
St. Louis, MO 63166-6149

**Electric Meeting Variance Committee Members:**

**James Watkins, Utility Division**  
Missouri Public Service Commission  
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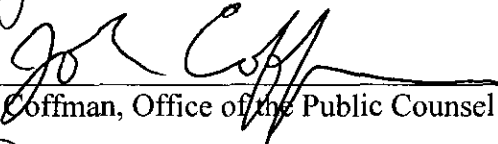
**Jim Ketter, Utility Division**  
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MEMORANDUM

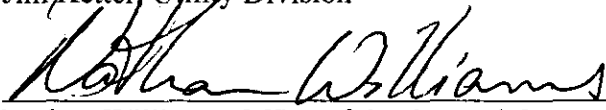
TO: Missouri Public Service Commission Official Case File  
Case No. EE-2001-514, Union Electric Company d/b/a AmerenUE

FROM: Electric Meter Variance Committee

  
James Watkins, Utility Division

  
John Coffman, Office of the Public Counsel

  
Jim Ketter, Utility Division

  
Nathan Williams, Office of the General Counsel

SUBJECT: Recommendation for Approval of a Variance from Individual Electric Metering requirement for service to The Volunteers of America St. Louis Affordable Housing Corporation project located at 14<sup>th</sup> Street and Chouteau Avenue, St. Louis, Missouri

DATE: June 21, 2001

On March 28, 2001, Union Electric Company, d/b/a AmerenUE, ("UE" or "Company") of St. Louis, Missouri, filed an APPLICATION FOR VARIANCE OF UNION ELECTRIC COMPANY ("Application"). This Application seeks a variance from the Missouri Public Service Commission's ("Commission") individual metering requirements contained in 4 CSR 240-20.050(2) for electric service to The Volunteers of America St. Louis Affordable Housing Corporation ("VOA St. Louis") project located at 14<sup>th</sup> and Chouteau Avenue, St. Louis, Missouri. On April 6, 2001, UE supplemented its application to bring it into compliance with 4 CSR 240-2.060(1)(K) and 4 CSR 240-2.060(L).

4 CSR 240-20.050(2) states:

Each residential and commercial unit in a multiple-occupancy building construction of which has begun after June 1, 1981 shall have installed a separate electric meter for each residential or commercial unit.

The Commission's rule is aimed at compliance with certain sections of the Public Utility Regulatory Policies Act of 1978. That Act, in part, provides:

Master metering

Separate metering shall be determined appropriate for any new building for purposes of section 2623(b)(1) of this title if –

- (1) there is more than one unit in such building,
- (2) the occupant of each such unit has control over a portion of the electric energy used in such unit, and
- (3) with respect to such portion of electric energy used in such unit, the long-run benefits to the electric consumers in such building exceed the costs of purchasing and installing separate meters in such building.

16 U.S.C. section 2625(d).

The Electric Meter Variance Committee has met and reviewed the application and information it has received regarding the VOA St. Louis project located at 14<sup>th</sup> Street and Chouteau Avenue, St. Louis, Missouri. The VOA St. Louis desires that UE provide master metering to each of the three buildings of this project. The project consists of three new buildings for subsidized elderly housing. One building will contain thirty (30) one-bedroom apartments and ten (10) two-bedroom apartments. A second building will contain sixty-one (61) one-bedroom apartments and one (1) two-bedroom apartment. The third building will contain offices, resident recreation and meeting space, a library, a computer lab and mailboxes. This third building will also be a secure entry point for the residents. Subsidies from the Department of Housing and Urban Development will be used to reduce the monthly cost to the residents of these apartments.

Because the long-run benefits to the electric consumers of separate metering are not expected to exceed the costs of purchasing and installing separate meters, UE filed the instant application. UE states in its application that it "estimates that individually metering each unit versus master metering would result in additional expenditures of approximately \$280 per apartment." Since the project includes 102 apartments this estimate totals \$28,560 (\$280 per meter x 102 apartments = \$28,560). The VOA St. Louis will be responsible for the payment of the electric bills for all the apartments; therefore, individual metering will cause an unnecessary increase in its construction costs to individually wire each apartment. The VOA St. Louis estimates its savings in construction costs to be \$76,500 if a single meter is allowed for each building.

The Electric Meter Variance Committee has considered the potential benefits to consumers of individual metering, i.e., the ability to directly receive the financial benefits of individual conservation and efficiency efforts and the potential for individual choice in selecting an electricity provider at some time in the future. The Committee finds that these potential benefits are likely to be of little value to consumers living in this subsidized housing project. Furthermore, since the VOA St. Louis will be responsible for paying the electric bill(s),

individual consumers would not directly receive the financial benefits of individual conservation and efficiency efforts in any event; and receiving, processing and paying separate bills for electric service would be unnecessary and costly.

The Electric Meter Variance Committee, for good cause shown, recommends that the Commission issue an order granting a variance from the Commission's Rule 4 CSR 240-20.050 (requiring separate metering) for electric service to the VOA St. Louis project located at 14<sup>th</sup> Street and Chouteau Avenue, St. Louis, Missouri. The Electric Meter Variance Committee also recommends that the Commission order Union Electric Company to file tariff sheets to list the variances from the Commission's Rule 4 CSR 240-20.050 that the Commission has granted to it.

Copies:      Director – Utility Operations Division  
                 Director – Utility Services Division  
                 General Counsel  
                 Manager – Financial Analysis Department  
                 Manager – Accounting Department  
                 Manager – Energy Department  
                 James Cook, Attorney, Ameren Services Company  
                 Office of Public Counsel