



Commissioners

SHEILA LUMPE
Chair

CONNIE MURRAY

KELVIN L. SIMMONS

STEVE GAW

Missouri Public Service Commission

POST OFFICE BOX 360
JEFFERSON CITY, MISSOURI 65102
573-751-3234
573-751-1847 (Fax Number)
<http://www.psc.state.mo.us>

June 28, 2001

WESS A. HENDERSON
Director, Utility Operations

ROBERT SCHALLENBERG
Director, Utility Services

DONNA M. KOLILIS
Director, Administration

DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE
General Counsel

FILED

JUN 28 2001

Missouri Public
Service Commission

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

RE: Case No. EE-2001-663 – In the Matter of the Application of Kansas City Power & Light Company For a Variance from the Commission's Rule Requiring Separate Metering At the David Cole Place Senior Citizens Apartments located at 11301 Grandview Road, Kansas City, 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

Enclosure

cc: Counsel of Record

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

FILED

JUN 28 2001

*Missouri Public
Service Commission*

In the Matter of the Application of Kansas)
City Power & Light Company For a)
Variance From the Commission's Rule)
Requiring Separate Metering At the David)
Cole Place Senior Citizens Apartments)
located at 11301 Grandview Road, Kansas)
City, Missouri.)

Case No. EE-2001-663

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 Kansas City Power & Light Company ("KCPL") a variance from the separate metering requirement of 4 CSR 240-20.050 to allow master metering of the residential living units of the David Cole Place Senior Citizens Apartments, a development project of the NBA Disciples Housing of Greater Kansas City, Inc., located at 11301 Grandview Road, Kansas City, Missouri. The project consists of a new apartment building containing 65 apartments for low-income senior citizen housing.

2. The Committee has determined that with respect to the portion of electric energy used by the residents of each apartment in 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 apartment.

3. Although its initial application failed to comply with the requirements of 4 CSR 240-2.060(1)(A-C, E, G-I and K-M), in response to the Commission's order directing filing issued June 11, 2001, KCPL supplemented its application to bring it into compliance with 4 CSR 240-2.060(1)(A-C, E, G-I and K-M). The supplementation was accomplished by a filing made on June 19, 2001 as amended by page substitution submitted on June 27, 2001.

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 Kansas City Power & Light Company for the David Cole Place Senior Citizens Apartments, a development project of the NBA Disciples Housing of Greater Kansas City, Inc., located at 11301 Grandview Road, Kansas City, Missouri, and that the Commission also order Kansas City Power & Light 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

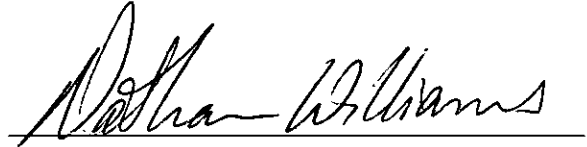


Nathan Williams
Associate General Counsel
Missouri Bar No. 35512

Attorney for the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8702 (Telephone)
(573) 751-9285 (Fax)

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 28th day of June, 2001.




Service List for
Case No. EE-2001-663
Verified: June 28, 2001 (RR)

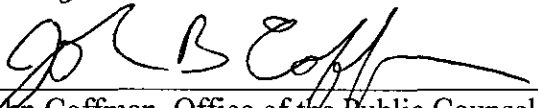
James M. Fischer
Fischer & Dority
101 Madison Street, Suite 400
Jefferson City, MO 65101

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. EE-2001-663, Kansas City Power & Light Company

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 David Cole Place Senior Citizens Apartments

DATE: June 22, 2001

On June 4, 2001, Kansas City Power & Light Company, ("KCPL") filed for a variance from the separate meter requirement of 4 CSR 240-20.050(2) ("Application"). KCPL seeks this variance for a project called the David Cole Place Senior Citizens Apartments ("Project") located at 11301 Grandview Road, Kansas City, Missouri. NBA¹ Disciples Housing of Greater Kansas City Inc. ("NBA") is developing the Project. In response to Commission Order, on June 19, 2001, KCPL supplemented its application to bring it into compliance with 4 CSR 240-2.060.

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.

¹ The National Benevolent Association of the Christian Church (Disciples of Christ)

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. § 2625(d).

The Project consists of sixty-five (65) apartments for low-income senior citizens. NBA has requested that KCPL provide master metering to the Project because master metering will lower the cost of constructing this low-income senior citizen housing. KCPL states in its application that "[t]he installation of a master meter will reduce construction costs by approximately \$18,200, [or \$280 per apartment]." It also states that NBA will be responsible for paying the electric bill for each apartment and the common facilities and, therefore, no purpose will be served by individually metering each apartment with the attendant unnecessary increase in construction costs to individually wire each apartment.

The Electric Meter Variance Committee has considered the potential benefits to consumers of separate 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 these low-income apartments. Furthermore, since the NBA 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 the Commission issue an order granting KCPL a variance from the Commission's Rule 4 CSR 240-20.050 (requiring separate metering) for electric service to the Project. The Electric Meter Variance Committee also recommends that the Commission order KCPL to file a revised Tariff Sheet No. 1.71 (Separate Metering Variances) to add this variance, if granted, to its list of variances from 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 Fischer, Attorney, KCPL
 Office of Public Counsel