

November 27, 2024

Re: PSC case OX-2025-0106 FILED
December 6, 2024
Missouri Public
Service Commission

To whom it may concern,

Ameren, Spire, and Evergy have already been providing energy data for free, since Kansas City & St. Louis passed Benchmarking ordinances. These utilities have already developed systems to provide the data and it has been working for several years. Why does the PSC want to suggest utilities now charge for this information? I oppose a charge for the data.

The approach requiring account holder consent will make it impossible for renters to obtain approximate energy costs prior to leasing a home or apartment. When a prospective tenant is screened to determine if they can afford a rental property, the screening service uses a formula as defined by HUD. The HUD Archives states Affordable housing is generally defined as housing on which the occupant is paying no more than 30 percent of gross income for housing costs, including utilities.

If estimated utility costs are not made available for prospective tenants, it is impossible to determine if a unit is affordable. Affordability is impossible to know for the tenant, the landlord, and even the tenant screening service. If energy data was available, I believe it could help reduce evictions, because affordability could be known prior to leasing. Please allow for the average utility cost for the past year, be easily available for renters, landlords, and property managers.

I do not agree with the notion that data must be aggregated to include 5 - 15 meters. Building owners cannot measure the efficacy of improvements if we cannot measure energy use before and after the improvements. It is a rare occasion that an entire multifamily building will receive a complete renovation. Our standard practice is to improve rental units as needed, one unit at a time. We want to be able to access data from individual meters. Tower Grove CDC and many of the community development corporations in STL have 2 & 4 unit buildings in our rental holdings. A 15+ unit building is rare. I personally have a single family rental home which I have benchmarked. If the PSC is going to require account holders' consent to access the utility data, then why must it be aggregated? Further, once permission is granted, it should remain available for the duration of the lease. The proposed PSC rule does not include a definition for aggregated data and I suggest it should not be defined by an arbitrary number of meters. This approach is counter to our ability to benchmark energy use in our buildings.

The PSC should support utility data access. Please do not make it more difficult, costly, or impossible to obtain data.

Kind regards,



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