

December 6, 2024

RE: OX-2025-0104, 0105, and 0106

Exhibits for Public Service Commission rule docket regarding data privacy

<https://efis.psc.mo.gov/Case/Display/90442>

Commission's Proposed Rule 20 CSR 4240-10.175 Relating to Customer Information of Electrical Corporations, Gas Corporations, Heating Companies, Certain Water Corporations and Certain Sewer Corporations.

Submitted by Dana Gray, Community Outreach Coordinator, Tower Grove Community Development Corp

Tower Grove Community Development Corporation (TG CDC) is a 501(c) 3 that has existed for 42 years. Tower Grove CDC promotes and improves quality of life by attracting public and private investment and providing real estate and other community services. TG CDC focuses on affordable housing development and community improvements in south St. Louis neighborhoods, serving a population of 36,824 residents in nearly 20,000 households.

Tower Grove Community Development Corp has been collecting electric & gas data to track the energy use before and after improvements. Energy data has been compiled 2018- 2024.

Below are images of several of buildings in TGCDC's rental portfolio.

Tower Grove CDC has been benchmarking so the efficacy of building improvements can be determined. Tower Grove CDC is also benchmarking the organization's office building.

St. Louis City and Kansas City have a benchmarking ordinance for buildings 50,000 Sq Ft+.



Energy Disclosure is available for home buyers. Below is an example of the MARIS platform, where realtors can list the utility average.

Even if a Realtor does not list the utility average on the MARIS platform, home buyers can request & readily receive the information.

MARIS is an abbreviation for Mid America Regional Information Systems. This company hosts the Multi Listing Service or MLS, where for-sale homes are listed by Realtors.

The screenshot shows the MARIS platform interface for listing utility information. The page is titled "Utilities, Assumptions & Financial Info" and includes several sections for selecting utility types and heating sources. A red arrow points to the "Utility Average" input field at the bottom left.

**Agent Information** | **General** | **Rooms & Baths** | **Description** | **Additional Info** | **Utilities, Assumptions & Financial Info** | **Lockbox Info** | **Remarks**

Central-Gas  
 Dual System  
 Ductless  
 Geothermal  
 Heat Pump  
 None  
 Power Roof Vents  
 Roof Turbines  
 14 SEER+  
 Zoned  
 Other

Public  
 Septic  
 Shared  
 Terre Du Lac

Geothermal  
 Ductless  
 Gravity Air  
 Heat Pump  
 HRV/ERV  
 Humidifier  
 Hot Water/Steam  
 Radiant Floor  
 Radiator(s)  
 Space Heaters  
 Zoned  
 Other

**Cable Available**  
Yes ⇅ ?

**Water (5)** ?  
 Cistern  
 Community  
 Lo-Flow Fixtures  
 Not Connected  
 Public  
 Shared  
 Well  
 Other/None

**Heat Source (3)** ?  
 Electric  
 Gas  
 Oil  
 Other  
 Propane  
 Solar  
 Steam  
 Wood  
 Wood Insert

**Water Heat (2)** ?  
 Additional  
 Electric  
 Gas  
 High Efficiency  
 Propane  
 Solar  
 Tankless HWH  
 Other

**Utility Average** ?

**Assumption Information**

Validate | Cancel Input | Submit Listing | Assumable Balance | Assumable Mortgage Payment | Assumable Payment

St. Louis City Alderpeople have been discussing a Renters Energy Disclosure policy. This would enable renters to obtain estimated costs of natural gas and electric utilities, prior to lease signing. If renters were provided estimated utility costs, they would know if a property was within their budget.

I have obtained the electric and natural gas costs, averaged for the past 12 months, from Spire and Ameren, so the estimated energy cost could be included in apartments advertisements. For 5 – 6 years, I have been including the estimated energy costs in apartment ads.

The next slide includes the language used to describe the estimated energy cost in my apartment ad.



# Energy Disclosure Example

Owner pays sewer, water, trash, recycling. Tenant pays gas, electric, phone, internet, & cable. For the past 12 months, the average gas bill was \$75 and the average electric bill was \$107. Occupant behavior & weather will greatly impact the gas & electric usage & cost. There is no guarantee the utility costs will remain the same. In addition to occupant behavior impacting the costs, the utility could have a rate increase.



**Zillow** Save Share Hide Mor

**\$875**/mo 1 bd | 1 ba | 800 sqft  
4230 Humphrey St #2, Saint Louis, MO 63116

● Apartment for rent

Request a tour Request to apply

Overview Facts and features Price history Nearby school >

<b>Date available</b>	Available Now	<b>Pets</b>	Cats
<b>Type</b>	Apartment	<b>Parking</b>	Contact manager
<b>Cooling</b>	Central Air	<b>Laundry</b>	Hookups
<b>Heating</b>	Forced Air	<b>Deposit &amp; fees</b>	\$875

Ameren’s Property Manager website provides access to the AVERAGE electric use. After registering for the site, data was accessible from the registration date forward. This is helpful for determining the average utility cost 12 months after establishing the account. This site is not useful for Benchmarking.

This averaged data is also useful to identify potential maintenance needs.

Sample from  
Ameren’s  
Property Manager  
portal

Address	Bdrs	Service Type	Kwh/Therm	Total Cost	Avg. Cost	Avg. Fac. C	Taxes	Days
3169 ALFRED UNIT 1	1	Electric	4237	668.02	60.47	8.96	26.72	336
3169 ALFRED UNIT 2F	1	Electric	4181	657.31	59.5	8.96	26.29	336
3171 ALFRED	1	Electric	265	196.19	17.76	11.91	24.9	336
3171 ALFRED UNIT 1F	1	Electric	2363	409.06	37.03	8.96	16.36	336
3171 ALFRED UNIT 2F	1	Electric	5108	817.76	74.03	8.96	32.72	336
3600 BAMBERGER UNIT 1	1	Electric	1961	356.47	32.27	8.96	14.26	336
3600 BAMBERGER UNIT 2	1	Electric	4556	693.29	62.76	8.96	27.73	336
3602 BAMBERGER UNIT 1	1	Electric	8780	1259.3	114	8.96	50.37	336
3602 BAMBERGER UNIT 2	1	Electric	4110	632.34	62.86	8.92	25.3	306
3606 BAMBERGER AVE UNIT 1F	1	Electric	2690	440.57	63.21	9.04	17.63	212
3606 BAMBERGER AVE UNIT 2F	1	Electric	4635	712.43	101.26	9	28.5	214
3608 BAMBERGER AVE UNIT 2	1	Electric	2559	420.71	59.8	8.95	16.83	214
3608 BAMBERGER UNIT 1F	1	Electric	1967	338.47	48.11	8.95	13.56	214
3610 BAMBERGER UNIT 1	1	Electric	2141	368.1	33.32	8.96	14.71	336
3610 BAMBERGER UNIT 2	1	Electric	5403	813.2	73.62	8.96	32.52	336
3612 BAMBERGER UNIT 1F	1	Electric	2942	478.6	43.33	8.96	19.14	336
3612 BAMBERGER UNIT 2F	1	Electric	4615	725.16	65.65	8.96	29.04	336
3644 BAMBERGER AVE	1	Electric	132	9.03	0.82	0	1.15	336
3644 BAMBERGER AVE UNIT 1F	1	Electric	2789	442.89	41.71	9.07	17.72	323
3644 BAMBERGER AVE UNIT 2F	1	Electric	13110	1680.65	158.27	9.07	67.22	323

Natural Gas data obtained by Tower Grove CDC via Spire; CustomerCare@spireenergy.com on April 12, 2024

For **Benchmarking** purposes, precise data is needed.

This is an example of the natural gas data provided by Spire for a Tower Grove CDC apartment in St. Louis, MO.

Tower Grove CDC obtained the tenants' permission to access the data, from the date of move-in to move-out.

Posting Date	Description	Billing Start Date	Billing End Date	Billing Days	Usage	Amount
02/26/2024	February Bill	01/23	02/22	30	35	64.35
02/12/2024	Payment					112.99
01/25/2024	January Bill	12/27	01/23	27	74	111.99
01/07/2024	Payment					56.81
12/28/2023	December Bill	11/29	12/27	28	28	55.81
11/29/2023	November Bill	10/25	11/29	35	25	51.99
10/26/2023	October Bill	09/26	10/25	29	1	22.45
09/26/2023	September Bill	08/25	09/26	32	1	22.40
08/28/2023	August Bill	07/25	08/25	31	1	22.39
07/26/2023	July Bill	06/26	07/25	29	1	22.39
06/27/2023	June Bill	05/25	06/26	32	1	22.39
05/25/2023	May Bill	04/21	05/25	34	1	22.23
04/25/2023	April Bill	03/23	04/21	29	1	22.04
03/27/2023	March Bill	02/22	03/23	29	33	60.61
02/23/2023	February Bill	01/24	02/22	29	80	117.27
01/26/2023	January Bill	12/27	01/24	28	49	77.21
12/28/2022	December Bill	11/22	12/27	35	57	82.24
11/23/2022	November Bill	10/24	11/22	29	19	41.31
10/26/2022	October Bill	09/28	10/24	26	2	25.17
09/28/2022	September Bill	08/29	09/28	30	0	23.29
08/30/2022	August Bill	07/25	08/29	35	0	23.29
07/26/2022	July Bill	06/24	07/25	31	0	23.29
06/29/2022	June Bill	06/17	06/24	7	0	5.43



This is an example of the electric data provided by Ameren for a Tower Grove CDC apartment in St. Louis, MO, for **Benchmarking** purposes.

Tower Grove CDC obtained the tenants' permission to access the data, from the date of move-in to move-out.

From	To	Usage	Product
10/1/2023	10/31/2023	935.5266	kWh
11/1/2023	11/30/2023	749.4498	kWh
12/1/2023	12/31/2023	810.5844	kWh
1/1/2024	1/31/2024	1036.5564	kWh
2/1/2024	2/29/2024	712.836	kWh
3/1/2024	3/31/2024	637.2438	kWh
4/1/2024	4/30/2024	798.063	kWh
5/1/2024	5/31/2024	1286.04	kWh
6/1/2024	6/30/2024	2854.3428	kWh
7/1/2024	7/31/2024	2766.7794	kWh
8/1/2024	8/31/2024	2797.8978	kWh
9/1/2024	9/30/2024	1746.6654	kWh
10/1/2024	10/31/2024	771.1822	kWh



MO has ~77,000, 2-4 unit multifamily buildings,  
 ~ 21,000, 5+ unit multifamily buildings 1-3 stories  
 That's ~ 98,000 multifamily buildings which would be affected by a requirement for aggregating 5 – 15 meters.

(Not counting 4+ story buildings with over 5 units)

<https://public.tableau.com/app/profile/nrel.buildingstock/viz/USBuildingTypologyResidential/Segments>

Source: NREL Residential Building Stock Analysis  
 Highly granular modeling of residential building stocks at national, regional, and local scales using OpenStudio/EnergyPlus physics simulations of a statistically representative sample of buildings, from National Renewable Energy Laboratory, Golden, CO.

Multi-Family with 2 - 4 Units	Wood Frame	<1940	8K		
		1940-79	30K		
		>1980	29K		
Multi-Family with 5+ Units (1-3 stories)	Masonry or Steel Frame	<1940	10K		
		1940-79	0K		
		>1980	11K		
Multi-Family with 5+ Units (4+ stories)	Wood Frame	<1940	0K		
		1940-79	7K		
		>1980	11K		
Multi-Family with 5+ Units (4+ stories)	Masonry or Steel Frame	<1940	1K		
		1940-79	1K		
		>1980	1K		
			0K	500K	1000K
			Number of buildings		
			<ul style="list-style-type: none"> <li><span style="color: blue;">■</span> electricity_cooling</li> <li><span style="color: orange;">■</span> electricity_water_heating</li> <li><span style="color: red;">■</span> onsite fuel water heating</li> </ul>		



Examples of Missouri's multifamily buildings:  
~1,000 bldgs in Jefferson County // ~12,000 in Jackson County (KC) // ~34,000 in St Louis County & City



Tower Grove CDC suggests:

Allow for multifamily property owners to access individual meter data for benchmarking, with account holder consent, from move-in to move-out of the account holder.

Allow utilities to provide the 12 month average cost for individual meters so renters are aware of approximate costs prior to lease signing.

Spire, Ameren, & Evergy already provide this data. Please do not begin charging for this access.