



Kansas City Power & Light®

Law Department

Michael A. Rump
Senior Attorney
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FILED

FEB 11 2003

February 7, 2003

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

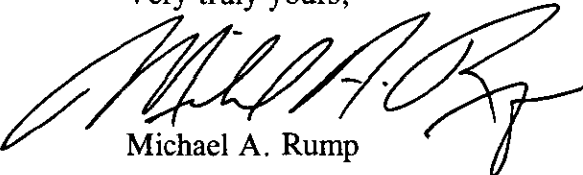
Re: In the Matter of the Application of Kansas City Power & Light Company for a
Variance from the Commission's Rule Requiring Separate Metering for the
Bishop Spencer Place

Dear Mr. Roberts:

Enclosed for filing you will find the original and eight (8) copies of KCPL's Application in the
above-captioned matter.

Please bring this filing to the attention of the appropriate Commission personnel.

Very truly yours,



Michael A. Rump

c: Dana K. Joyce, General Counsel
Office of the Public Counsel
Alan Bax
Doug Nickelson
Dave Wagner

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

FEB 11 2003

Missouri Public
Service Commission

In the Matter of the Application of)
Kansas City Power & Light Company)
For a Variance from the Commission's) Case No.
Rule Requiring Separate Metering for)
the Bishop Spencer Place.)

APPLICATION FOR VARIANCE

COMES NOW Kansas City Power & Light Company ("KCPL") and for its Application for a variance from 4 CSR 240-20.050, alleges and states:

1. KCPL is a corporation organized and existing under and by virtue of the laws of the State of Missouri, with its principal office at 1201 Walnut, Kansas City, Missouri 64106-2124. KCPL's Certificate of Good Standing was provided in Case No. EF-2002-315 and is incorporated herein by reference.

2. KCPL holds Certificates of Convenience and Necessity from the Commission to transact business as an electric public utility in certain areas of the State of Missouri and is principally engaged in the generation, transmission, distribution and sale of electric power and energy.

3. Communications in this matter should be addressed to:

Michael A. Rump
Senior Attorney
Kansas City Power & Light Company
1201 Walnut
P.O. Box 418679
Kansas City, Missouri 64141-9679
Telephone: (816) 556-2483
Telecopy: (816) 556-2787
Email: mike.rump@kcpl.com

4. KCPL has heretofore filed with this Commission a certified copy of the Articles of Consolidation under which it was organized and of all amendments thereto.

5. KCPL has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court, which involve customer service or rates, which has occurred within three (3) years of the date of the Application, except as identified on Exhibit 1 hereto. No annual report or assessment fees are overdue.

6. KCPL requests a variance from the separate metering requirement of 4 CSR 240-20.050(2) for the Bishop Spencer Place located at 4301 Madison Avenue, Kansas City, Missouri 64111. The owner of the Bishop Spencer Place has requested master metering for this project which will require a variance from 4 CSR 240-20.050.

7. The Bishop Spencer Place has an existing apartment building, with 155 residents over the age of sixty, in independent living apartments, assisted living suites or nursing home facilities. The existing building has individually metered rooms. Bishop Spencer Place pays all utilities except for individual resident telephone service.

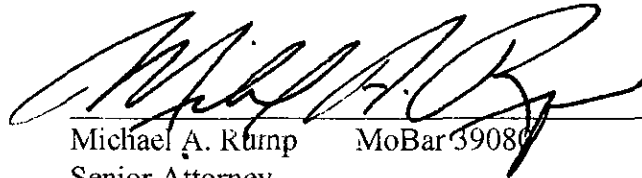
8. The Bishop Spencer Place plans on expanding its facility with a new eight story, 126-unit apartment building. There will be a large common area on the first and second floors consisting of an auditorium, arts and crafts room, grill bistro, computer room, exercise room, beauty shop and activity areas.

9. The owner of this project has requested that one meter be installed to serve the new building. The owner will be responsible for the payment of the bills for each apartment and the common facilities. Separate metering will increase initial construction costs and obstruct the intentions of the owner.

10. The owner has estimated that separate metering each apartment as opposed to master metering the building would result in additional expenditures of approximately \$87,000 or \$701.61 per apartment. A copy of the owner's estimate is attached hereto as Exhibit 2. In Case No. EO-2000-251, concerning a variance from the separate metering requirement for the Bickford House, KCPL estimated its costs to be \$49.40 per apartment for separate metering, which would be an additional cost of \$6,125.60 in the present case. KCPL supports the owner's request for the metering of the project because of the overall cost-benefits.

WHEREFORE, for the above and foregoing reasons, Kansas City Power & Light Company respectfully requests a variance from the separate metering requirement of 4 CSR 240-20.050 to allow master metering for the new apartment building to be constructed by the Bishop Spencer Place.

Respectfully submitted,



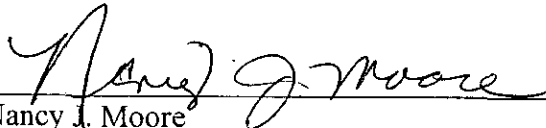
Michael A. Rumpf MoBar 39080
Senior Attorney
1201 Walnut
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Kansas City, Missouri 64141-9679
Telephone: (816) 556-2483
Telecopy: (816) 556-2787

Attorney for
Kansas City Power & Light Company

VERIFICATION

State of Missouri)
)
County of Jackson) Ss:

Nancy J. Moore, being first duly sworn upon her oath, deposes and states that she is Vice President – Customer Services for Kansas City Power & Light Company, that she has read and is familiar with the foregoing application and that the statements therein are true and correct to the best of her knowledge, information and belief.



Nancy J. Moore

Subscribed and sworn to before me this 6th day of February 2003.



Notary Public

My Commission Expires:
6-22-06

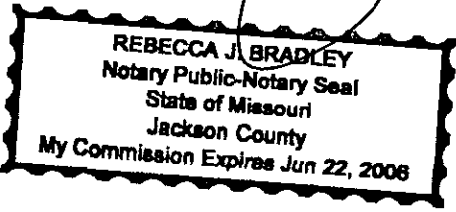


EXHIBIT 1

The following is a list of Applicant's pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this application:

1. GST Appeal of Missouri Public Service Commission Decision; Case No. EC-99-553 in the Circuit Court of Cole County, Missouri; Docket No. 00CV324891; further appealed to the Court of Appeals of the Western District of Missouri by GST.
2. Hawthorn Station Incident Investigation before the Missouri Public Service Commission; Case No. ES-99-581.



4901 Main Street
Kansas City, Missouri 64112
(816) 531-7000 FAX 531-7001

January 8, 2003

Mr. Ralph Long
Senior Electrical Designer
Henderson Engineers Incorporated
8325 Lenexa Drive, Suite 400
Lenexa, Kansas 66214

Re: Multiple vs. Single Electrical Metering
Bishop Spencer Place Expansion

Dear Ralph:

In accordance with your December 16th request, I am furnishing the following information which I understand you will forward to Mr. Mike Rump, Senior Attorney at KCPL. The purpose of this information is to validate Jean Bacon's request of September 17, 2002 to Mr. Rump that the expansion be permitted to have one master meter rather than individual meters for each of the 124 living units in the eight-story building.

We have asked J. E. Dunn, the project's general contractor, to furnish us an estimate of the cost savings for one master meter vs. 124 individual meters plus one for the common areas. A copy of Jim Miller's letter dated January 3rd together with J. E. Dunn's cost estimate is enclosed. It estimates a cost savings to the project for one meter vs. multiple meters of approximately \$49,000 in cost savings. Additionally, they estimate an additional \$38,000 for added space for individual meters for a total variance of \$87,000.

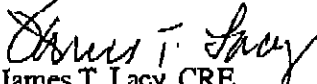
The 124 units are being marketed with the understanding that BSP would be paying all utilities and therefore the living units were designed without provisions for multiple metering, that space being incorporated into the units which are large by comparative standards. If multiple electrical meters were required, it would cause unnecessary expense and require that several units on each floor be reduced in size to accommodate a room for meters. While individual meters are very appropriate for other types of living units, they clearly are not required or appropriate for BSP's expansion.

Exhibit 2

January 8, 2003

If there is anything further you may need in this regard for KCP&L, please let me know. I would be available to discuss any questions Mr. Rump may have. I assume the information contained herein will provide KCP&L and the Missouri Public Service Commission adequate data to approve BSP's request for single metering for this project.

Sincerely yours,


James T. Lacy, CRE
Owner's Representative

JTL:llh

Enclosure - 1/3/03 letter from J. E. Dunn with
attached breakdown of electrical equipment

cc: Jean Bacon, Bishop Spencer Place
Neal Palmer, J. E. Dunn
Jeff Ganthner, SFCS
Shane Lutz, Henderson Engineers
Amy Bochringer, Henderson Engineers



January 3, 2003

Mr. Jim Lacy
Lacy & Company
4940 Main
Kansas City, MO 64112

Re: *Bishop Spencer Place*

Dear Jim:

As requested, we have prepared, as summarized below, an estimate, which compares centralized electrical metering vs. individual electrical metering. In our opinion, the Owner will save approximately \$87,000 by providing one meter located in the main electrical room, as opposed to individual meters located in electrical closets on each floor.

Cost Variance Summary:

Added Space for Individual Meters	\$38,000
Electrical Premium	<u>49,000</u>
Approximate Variance	\$87,000

For your information, we have attached the breakdown for the electrical equipment. We have not included costs related to the utility company.

Please call with questions.

Sincerely,

J.E. DUNN CONSTRUCTION COMPANY

JRM
J. R. Miller

JRM:km
Encl.

LACY & COMPANY

JAN 06 2003

File

- ATLANTA
- AUSTIN
- CHARLOTTE, NC
- COLORADO SPRINGS
- DALLAS
- DENVER
- DES MOINES
- HOUSTON
- KANSAS CITY
- MINNEAPOLIS
- NASHVILLE
- ORLANDO
- PORTLAND
- SEATTLE
- TOPEKA

JE Dunn Construction Company, Inc.
Bishop Spencer Place

Revision: 01/06/03

Description	Quantity	Material Unit	Total Material	Labor Unit	Total Labor	Labor Rate	Sub-Total Labor Dollars	Expendables / Supplies / Consumables	Expendables	Total Labor Dollars	Sub-Total Material & Labor	Overhead & Profit	Total Overhead & Profit	Grand Total
6-Meter 125A 120/208V 1 Phase Meter Stack With 6 125A Circuit Breakers	-21	\$1,108.0000	(\$23,100.00)	6.0000	(126.00)	\$43.44	(\$5,473.44)	3.00%	(\$164.20)	(\$5,637.64)	(\$28,737.64)	10.00%	(\$2,873.76)	(\$31,611.41)
800A NEMA 1 Meter Center Main Disconnect	-10	\$2,750.0000	(\$27,500.00)	23.0000	(230.00)	\$43.44	(\$9,991.20)	3.00%	(\$299.74)	(\$10,290.94)	(\$37,790.94)	10.00%	(\$3,779.09)	(\$41,570.03)
4000A Switchboard Utility Compartment (Note CT's & Meter Provided By Utility)	0	\$3,503.0000	\$0.00	20.0000	0.00	\$43.44	\$0.00	3.00%	\$0.00	\$0.00	\$0.00	10.00%	\$0.00	\$0.00
3 Phase Meter Can	0	\$400.0000	\$0.00	5.0000	0.00	\$43.44	\$0.00	3.00%	\$0.00	\$0.00	\$0.00	10.00%	\$0.00	\$0.00
120/208V 800A Distribution Panel	5	\$3,665.0000	\$18,325.00	15.0000	75.00	\$43.44	\$3,258.00	3.00%	\$97.74	\$3,355.74	\$21,680.74	10.00%	\$2,168.07	\$23,848.81
			\$0.00		0.00	\$43.44	\$0.00	3.00%	\$0.00	\$0.00	\$0.00	10.00%	\$0.00	\$0.00
			\$0.00		0.00	\$43.44	\$0.00	3.00%	\$0.00	\$0.00	\$0.00	10.00%	\$0.00	\$0.00
			\$0.00		0.00	\$43.44	\$0.00	3.00%	\$0.00	\$0.00	\$0.00	10.00%	\$0.00	\$0.00
			\$0.00		0.00	\$43.44	\$0.00	3.00%	\$0.00	\$0.00	\$0.00	10.00%	\$0.00	\$0.00
Totals			(\$32,275.00)		(281.00)		(\$12,208.64)	3.00%	(\$366.20)	(\$12,572.84)	(\$44,847.84)			(\$49,332.62)

Notes:

- 1.) Please Note That Going To (1) Central Meter In Lieu Of Individual Meter Stacks Will Also Provide Additional Space In Each Of The Electrical Rooms.
- 2.) I Have Assumed That We Would Go To One Main Electrical Room With (5) 800A Distribution Panels To Feed The (124) Individual Units
- 3.) The 4000A Switchboard Utility Compartment Will Already Be Included In The Work Regardless Of Which Scenario Is Chosen.
- 4.) The 3 Phase Meter Can Will Already Be Included In The Work Regardless Of Which Scenario Is Chosen.
- 5.) I Have Included (5) 120/208V 800A Distribution Panels Due To Ralph Long's Recommendation
- 6.)

LACY & COMPANY

JAN 07 2003

JAN-10-2003 16:54
 JAN-10-2003 FRI 04:58 PM LACY AND COMPANY
 Henderson Engineers, Inc.
 FAX NO. 8185317001
 913 307 5400
 P. 05/05

TOTAL P.05