



E104-023

**TRK Development, Inc.**

Telephone (763) 545-3080

Fax (763) 545-3077

May 21, 2004

RECEIVED

MAY 28 2004

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Pam Borrud, Executive Director  
SD Public Utilities Commission  
Capitol Building  
500 East Capitol Avenue  
Pierre, SD 57501

RE: Prairie Village Senior Apartments  
4901 East 41<sup>st</sup> Street  
Sioux Falls, SD

Dear Ms. Borrud:

*Michelle said this was not  
doctored when it came  
in because they determined  
they met the natural gas req,  
but upon further  
review they decided they  
did not meet the  
electrical part.*

My contractor, Developers & Associates, Inc., received a letter from MidAmerican Energy which stated that "any person constructing a multi-occupancy building with central heating or cooling systems, central ventilating systems, or central water heating systems is required to file a request for variance with the SD Public Utilities Commission. This requirement is contained in the SDPUC rules Section 20:10:26:04 item (6). Exceptions to the requirement are also contained in Section 20:10:26:04 items (1)-(5)."

This statement is somewhat confusing as 20:10:26:04 (1)-(6) are all exceptions to individual metering as it states "individual metering – when not required. Individual meters are not required and no variance need be requested under the following circumstances: (6) For multi-occupancy building which have central heating or cooling systems, central ventilation systems or central water heating systems. However, the applicant shall notify the commission so it may determine whether the applicant's system falls within this exception or whether the applicant is required to file an application for a variance with the Commission consistent with this chapter."

I'm therefore notifying the Commission that Prairie Village Senior Apartments has a gas fired central heating system and hot water heating system for the 49 apartment units, and that the systems are being used for cost-effectiveness, energy efficiency and energy conservation effects.

Sincerely,

*1 gas-meter*



Tom Kleve  
President

**TRK Development, Inc.**

Telephone (763) 545-3080

Fax (763) 545-3077

**RECEIVED**  
JUN 21 2004  
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

June 17, 2004

Pam Borrud, Executive Director  
SD Public Utilities Commission  
Capitol Building  
500 East Capitol Avenue  
Pierre, SD 57501

RE: Prairie Village Senior Apartments  
4907 East 41<sup>st</sup> Street  
Sioux Falls, SD

Dear Ms. Borrud:

I have been in discussions with Michele from your office about our project and the fact that we designed the building to have the owner pay for electric service so each unit is not metered separately. My understanding is that we may have to file for a variance. Please accept this letter as my request for a variance of the requirements contained in the SDPUC rules Section 20:10:26:04.

The building was designed this way because it is an affordable housing development funded under the South Dakota Housing Development Authority's tax credit program. This program requires us to keep rents affordable and in order to do this the owner is paying the electricity for the residents. We are also keeping our rents low enough so that our residents qualify under the Sioux Falls Housing Authority voucher program. Due to the tight budget constraints on a development like this, it would be a hardship to the project to add individual meters since it would cost more to install each meter than to have one meter for the whole building. Even if we did install individual meters, the rent restrictions would not allow us to pass the cost on to the residents anyway so I am not sure what the advantage would be to having separate meters.

Please call me at 763-545-3080 with any questions. Thanks for your consideration of this matter.

Sincerely,



Tom Kleve  
President

**South Dakota Public Utilities Commission**  
**WEEKLY FILINGS**  
**For the Period of June 17, 2004 through June 23, 2004**

If you need a complete copy of a filing faxed, overnight expressed, or mailed to you, please contact  
Delaine Kolbo within five business days of this report. Phone: 605-773-3201

**ELECTRIC**

**EL04-023**      **In the Matter of the Filing by TRK Development, Inc. for an Electric Master Metering Variance.**

On June 21, 2004, TRK Development, Inc. filed a request for a variance of the individual metering requirement contained in ARSD 20:10:26. TRK Development is designing a building for affordable housing funded under the South Dakota Housing Development Authority's tax credit program. The building is designed to have the owner pay the electric service for each unit and therefore TRK is requesting to master meter the electric for the building.

Staff Analyst: Michele Farris  
Staff Attorney: Karen Cremer  
Date Filed: 06/21/04  
Intervention Deadline: 07/09/04

**TELECOMMUNICATIONS**

**TC04-104**      **In the Matter of the Establishment of Switched Access Revenue Requirement for Cheyenne River Sioux Tribe Telephone Authority.**

On June 22, 2004, Cheyenne River Sioux Tribe Telephone Authority, Eagle Butte, South Dakota, filed a switched access cost study developing a revenue requirement and minutes of use that are included in the revenue requirement and minutes of use used to determine the switched access rates for the Local Exchange Carriers Association.

Staff Analyst: Harlan Best  
Staff Attorney: Karen Cremer  
Date Docketed: 06/22/04  
Intervention Deadline: 07/09/04

**TC04-105**      **In the Matter of the Application of Telecom Management, Inc. d/b/a Pioneer Telephone for a Certificate of Authority to Provide Interexchange Telecommunications Services in South Dakota.**

On June 23, 2004, Telecom Management, Inc. d/b/a Pioneer Telephone filed an application for a Certificate of Authority to provide telecommunication services in South Dakota. The applicant intends to provide resold interexchange long distance services to residential and business customers throughout South Dakota.

Staff Analyst: Michele Farris  
Staff Attorney: Karen Cremer  
Date Filed: 06/23/04  
Intervention Deadline: 07/09/04

**TC04-106**      **In the Matter of the Establishment of Switched Access Revenue Requirement for**

**Alliance Communications Cooperative, Inc.**

On June 23, 2004, Alliance Communications Cooperative, Inc., Garretson, South Dakota, filed a switched access cost study developing a revenue requirement and minutes of use that are included in the revenue requirement and minutes of use used to determine the switched access rates for the Local Exchange Carriers Association.

Staff Analyst: Keith Senger  
Staff Attorney: Karen Cremer  
Date Docketed: 06/23/04  
Intervention Deadline: 07/09/04

**TC04-107 In the Matter of the Establishment of Switched Access Revenue Requirement for Splitrock Properties, Inc.**

On June 23, 2004, Splitrock Properties, Inc., Garretson, South Dakota, filed a switched access cost study developing a revenue requirement and minutes of use that are included in the revenue requirement and minutes of use used to determine the switched access rates for the Local Exchange Carriers Association.

Staff Analyst: Keith Senger  
Staff Attorney: Karen Cremer  
Date Docketed: 06/23/04  
Intervention Deadline: 07/09/04

**TC04-108 In the Matter of the Establishment of Switched Access Revenue Requirement for Valley Telecommunications Cooperative Association, Inc.**

On June 23, 2004, Valley Telecommunications Cooperative Association, Inc., Herried, South Dakota, filed a switched access cost study developing a revenue requirement and minutes of use that are included in the revenue requirement and minutes of use used to determine the switched access rates for the Local Exchange Carriers Association.

Staff Analyst: Harlan Best  
Staff Attorney: Karen Cremer  
Date Docketed: 6/23/04  
Intervention Deadline: 7/09/04

**TC04-109 In the Matter of the Section 272 Biennial Report for Qwest Communications International, Inc.**

On June 14, 2003, the Commission received from Ernst & Young a Report of Independent Accountants on Applying Agreed-Upon Procedures regarding the section 272 biennial report for Qwest Communications International, Inc. Pursuant to section 272 (d) of the Communications Act of 1934, as amended, the Commission is accepting comments on this report. Any person may submit comments and the comments should include any proposal for how the Commission should proceed with this docket.

Staff Analyst: Harlan Best  
Staff Attorney: Karen E. Cremer  
Comments Due: 07/23/04

You may receive this listing and other PUC publications via our website or via internet e-mail.  
You may subscribe or unsubscribe to the PUC mailing lists at <http://www.state.sd.us/puc>

ELO4-023

**TRK Development, Inc.**

Telephone (763) 545-3080

Fax (763) 545-3077

June 30, 2004

**RECEIVED**

**JUL 06 2004**

**SOUTH DAKOTA PUBLIC  
UTILITIES COMMISSION**

Pam Borrud, Executive Director  
SD Public Utilities Commission  
Capitol Building  
500 East Capitol Avenue  
Pierre, SD 57501

**FAX Received JUN 30 2004**

RE: Prairie Village Senior Apartments  
4907 East 41<sup>st</sup> Street  
Sioux Falls, SD

Dear Ms. Borrud:

I have been in further discussions with staff from your office and as a follow-up to my letter of June 17 requesting a variance of the requirements contained in the SDPUC rules Section 20:10:26:04, I am not requesting a formal hearing.

Please call me at 763-545-3080 with any questions. Thanks for your consideration of this matter.

Sincerely,



Tom Kleve  
President

**TRK Development, Inc.**

Telephone (763) 545-3080

Fax (763) 545-3077

June 30, 2004

Pam Borrud, Executive Director  
SD Public Utilities Commission  
Capitol Building  
500 East Capitol Avenue  
Pierre, SD 57501

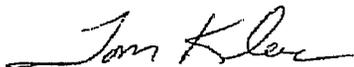
RE: Prairie Village Senior Apartments  
4907 East 41<sup>st</sup> Street  
Sioux Falls, SD

Dear Ms. Borrud:

I have been in further discussions with staff from your office and as a follow-up to my letter of June 17 requesting a variance of the requirements contained in the SDPUC rules Section 20:10:26:04, I am not requesting a formal hearing.

Please call me at 763-545-3080 with any questions. Thanks for your consideration of this matter.

Sincerely,



Tom Kleve  
President



Bob Sahr, Chair  
Gary Hanson, Vice-Chair  
Jim Burg, Commissioner

## SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

500 East Capitol Avenue  
Pierre, South Dakota 57501-5070  
[www.state.sd.us/puc](http://www.state.sd.us/puc)

Capitol Office  
(605) 773-3201  
(605) 773-3809 fax

Transportation/Warehouse  
(605) 773-5280  
(605) 773-3225 fax

Consumer Hotline  
1-800-332-1782

July 2, 2004

VIA FAX: 605-331-2371

Ms. Jen Sprenkle  
The Argus Leader  
Display Advertising Department  
P. O. Box 5034  
Sioux Falls, SD 57117-5034

Re: In the Matter of the Filing by TRK Development, Inc.  
for an Electric Master Metering Variance  
Docket EL.04-023

Dear Ms. Sprenkie:

Enclosed you will find Notice of Request for an Electric Master Metering Variance by TRK Development, Inc. for the Prairie Village Senior Apartments in Sioux Falls with reference to the above captioned matter. Please publish the enclosed Notice in your paper as a display advertisement for one issue on July 7, 2004.

Please send us your Affidavit of Publication and invoice as soon as possible. Thank you.

Very truly yours,

John Smith  
Commission Counsel

JS:dk  
Enc.

## SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

### NOTICE OF REQUEST FOR AN ELECTRIC MASTER METERING VARIANCE BY TRK DEVELOPMENT, INC. FOR THE PRAIRIE VILLAGE SENIOR APARTMENTS IN SIOUX FALLS.

PUC DOCKET NO. EL04-023

On June 21, 2004, the South Dakota Public Utilities Commission (Commission) received a request from TRK Development, Inc. (TRK) for a variance of the individual metering requirement contained in ARSD 20:10:26 regarding the designing of Prairie Village Senior Apartments, a development for affordable housing funded under the South Dakota Housing Development Authority's tax credit program. The variance request states that the building is designed to have the owner pay the electric service for all units and therefore TRK wishes to master meter the electric for the building.

TRK has not requested a formal hearing on the above entitled matter. However, any interested party may request a hearing by providing notice to the Commission within 10 days of publication of this notice. If a party does request a hearing, any other interested party may petition for intervention by following the procedure set forth in ARSD 20:10:01:15.02, which is available on the Commission's web site at [www.state.sd.us/puc](http://www.state.sd.us/puc) or may be obtained by calling or writing the Commission. If no party requests a hearing and there are no contested issues, the Commission may render a final decision on the application at a regular or special meeting. The Commission is intending to schedule this matter for decision at its July 20, 2004, meeting. The public is invited to provide written or spoken comments to the Commission. If sufficient public interest is demonstrated or if requested by a party, the Commission may schedule a public input hearing regarding the variance request.

The public may offer comments or obtain copies of the request for variance and other non-confidential filings in the case by contacting the South Dakota Public Utilities Commission, 500 E. Capitol Avenue, Pierre, SD 57501; ph. (800) 332-1782 or (605) 773-3201; fax (605) 773-3809; e-mail: [pam.bonrud@state.sd.us](mailto:pam.bonrud@state.sd.us).

\*\*\*\*\*  
 \*\*\* ACTIVITY REPORT \*\*\*  
 \*\*\*\*\*

ST. TIME	CONNECTION TEL	CONNECTION ID	NO.	MODE	PGS.	RESULT
*06/24 17:44	9p14077400613		4590	TRANSMIT ECM	10	OK 02'27
*06/25 11:00	9pp17037141330	The Helein Law G	4591	TRANSMIT ECM	1	OK 00'33
*06/25 11:01	9pp14058409002	EHAC CORP	4592	TRANSMIT ECM	1	OK 02'16
*06/25 11:20	9pp12189983165		4593	TRANSMIT ECM	21	OK 08'07
*06/25 11:47	915098357566		4594	TRANSMIT ECM	1	OK 00'27
*06/25 12:04	9p12104995314		4595	TRANSMIT	0	NG 00'00
					0	#018
*06/25 13:42	99450806		4596	TRANSMIT G3	2	OK 01'22
*06/25 16:17	99455295	MEDICAL ASSOCIAT	4597	TRANSMIT ECM	2	OK 00'47
*06/28 08:47	918322130292		4598	TRANSMIT ECM	5	OK 02'31
*06/28 13:38	9p16052252497		4599	TRANSMIT	0	NG 00'00
					0	STOP
*06/28 13:40	9p16052252497		4600	TRANSMIT ECM	1	OK 00'23
*06/28 13:41	9p2246289		4601	TRANSMIT ECM	1	OK 00'24
*06/28 13:42	9p2241637		4602	TRANSMIT ECM	1	OK 00'24
*06/28 13:44	9p16056924611		4603	TRANSMIT G3	1	OK 00'42
*06/28 13:46	9p16057964227		4604	TRANSMIT G3	1	OK 00'41
*06/28 13:48	9p2247102		4605	TRANSMIT ECM	1	OK 00'23
*06/28 13:50	9p16053429503	GUNDERSON PALMER	4606	TRANSMIT ECM	1	OK 00'25
*06/28 13:57	5129		4607	TRANSMIT ECM	1	OK 00'21
*06/28 14:09	92246301		4608	TRANSMIT ECM	6	OK 03'51
*06/28 17:04	919185473175		4609	TRANSMIT ECM	3	OK 01'23
*06/29 15:32	9p16059789375		4610	TRANSMIT ECM	1	OK 02'08
*06/29 16:45			6776	AUTO FAX RX ECM	2	OK 00'37
*06/30 09:40	916056429449		4611	TRANSMIT ECM	4	OK 01'23
*06/30 13:51	9p16057212550	BHC LEGAL DEPT.	4612	TRANSMIT ECM	5	OK 01'42
*06/30 15:59	92247102		4613	TRANSMIT ECM	22	OK 05'09
*06/30 16:14	9p17136508141		4614	TRANSMIT ECM	21	OK 05'44
*06/30 16:41	9p12025085599		4615	TRANSMIT G3	1	OK 00'31
*06/30 16:53	9p13522439746		4616	TRANSMIT	0	NG 00'00
					0	#018
*06/30 16:54	9p16194353032		4617	TRANSMIT ECM	1	OK 00'36
*06/30 16:58	9p16508552223		4619	TRANSMIT ECM	1	OK 03'34
*06/30 17:05	9p13522439746		4618	TRANSMIT	0	NG 00'00
					0	#018
*06/30 17:10	9pp13522439746		4620	TRANSMIT	0	NG 00'00
					0	#018
07/01 08:41	914255868118	WESTERN WIRELESS	4621	TRANSMIT ECM	3	OK 01'16
07/01 10:54	9p14342930408		4622	TRANSMIT ECM	4	OK 01'25
07/01 11:05	9p16057212577	BHP MKT	4623	TRANSMIT ECM	2	OK 00'39
07/01 11:16	9p14077400613		4624	TRANSMIT ECM	2	OK 00'40
07/01 11:56	9pp13522439746		4625	TRANSMIT	0	NG 00'00
					0	#018
07/01 13:50	9p12025085038		4626	TRANSMIT ECM	2	OK 00'48
07/02 10:36	9p16053321333		4627	TRANSMIT ECM	3	OK 01'03
07/02 11:05	9p16053312371		4628	TRANSMIT ECM	2	OK 00'47



Bob Sahr, Chair  
Gary Hanson, Vice-Chair  
Jim Burg, Commissioner

# SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

500 East Capitol Avenue  
Pierre, South Dakota 57501-5070  
[www.state.sd.us/puc](http://www.state.sd.us/puc)

Capitol Office  
(605) 773-3201  
(605) 773-3809 fax

Transportation/Warehouse  
(605) 773-5280  
(605) 773-3225 fax

Consumer Hotline  
1-800-332-1782

July 2, 2004

Mr. Jim Wilcox  
Manager  
Government & Regulatory Services  
Xcel Energy  
P. O. Box 988  
Sioux Falls, SD 57101-0988

Re: In the Matter of the Filing by TRK Development, Inc.  
for an Electric Master Metering Variance  
Docket EL04-023

Dear Jim:

Enclosed for your information you will find a copy of Docket EL04-023.

Very truly yours,

Karen E. Cremer  
Staff Attorney

KEC:dk  
Enc.

CUSTOMER NUMBER:	044377	<b>Argus Leader</b>	
INVOICE NUMBER:	421180	P.O. Box 5034, Sioux Falls, S.D. 57117-5034	
RUN DATES:	7/9, 2004	Amount	\$368.00

**RECEIVED**

JUL 12 2004

SD PUBLIC UTILITIES COMMISSION  
 ATTN: JOHN SMITH  
 500 EAST CAPITOL AVE  
 PIERRE, SD. 57501-5034

SOUTH DAKOTA PUBLIC  
 UTILITIES COMMISSION

DETACH THIS STUB AND RETURN WITH PAYMENT

PAYMENT DUE UPON RECEIPT

AFFIDAVIT OF PUBLICATION-  
 Customer Number: 044377  
 Invoice Number: 421180

**Argus Leader**  
**AFFIDAVIT OF PUBLICATIO**

STATE OF SOUTH DAKOTA  
 COUNTY OF MINNEHAHA } ss

Vicki Kiel being duly sworn, says: That The Argus Leader and during all the times hereinafter mentioned was, a daily legal newspaper as defined by SDCL 17-2-21, as amended published at Sioux Falls, Minnehaha County, South Dakota that affiant is and during all of said times, was an employ the publisher of such newspaper and has personal knowledge of the facts stated in this affidavit; that the notice, order or advertisement, a printed copy of which is hereto attached published in said newspaper upon

**SOUTH DAKOTA PUBLIC UTILITIES COMMISSION**  
**NOTICE OF REQUEST FOR AN ELECTRIC MASTER METER**  
**VARIANCE BY TRK DEVELOPMENT, INC. FOR THE PRAIRIE**  
**VILLAGE SENIOR APARTMENTS IN SIOUX FALLS.**

PUC DOCKET NO. EL04-023

On June 21, 2004, the South Dakota Public Utilities Commission (Commission) received a request from TRK Development, Inc. (TRK) for a variance of individual metering requirement contained in ARSD 20:10:01:15.02, for the design of Prairie Village Senior Apartments, a development for affordable housing funded under the South Dakota Housing Development program. The variance request states that the building is designed to have the electric service for all units and therefore TRK wishes to master meter electric for the building.

TRK has not requested a formal hearing on the above entitled matter. However, interested party may request a hearing by providing notice to the Commission within 10 days of publication of this notice. If a party does request a hearing, any interested party may petition for intervention by following the procedure set forth in ARSD 20:10:01:15.02, which is available on the Commission's web site at [www.state.sd.us/puc](http://www.state.sd.us/puc) or may be obtained by calling or writing the Commission. If a party requests a hearing and there are no contested issues, the Commission will render a final decision on the application at a regular or special meeting. The Commission is intending to schedule this matter or spoken comments to the Commission. If sufficient public interest is demonstrated or if requested by a party, the Commission may schedule a public input hearing regarding the variance request.

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Friday, the 9 day of July, 2004,  
 \_\_\_\_\_, the \_\_\_\_\_ day of \_\_\_\_\_, 2004,

and that \$368.00 was charged for publishing the same for display advertising.

*[Signature]*  
 Subscribed and sworn to before me 7/9/2004

JACQUELINE ZIMMERMAN  
 NOTARY PUBLIC  
 SOUTH DAKOTA

*[Signature]*  
 Notary Public South Dakota

My Commission expires December 22, 2009

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

IN THE MATTER OF THE FILING BY TRK ) ORDER DENYING REQUEST  
DEVELOPMENT, INC. FOR AN ELECTRIC ) FOR VARIANCE AND  
MASTER METERING VARIANCE ) CLOSING DOCKET  
) EL04-023

On June 21, 2004, TRK Development, Inc. (TRK) filed a request for a variance of the individual metering requirement contained in ARSD 20:10:26. TRK Development is designing a building for affordable housing funded under the South Dakota Housing Development Authority's tax credit program. The building is designed to have the owner pay the electric service for each unit and therefore TRK is requesting to master meter the electric for the building.

On July 20, 2004, at its regularly scheduled meeting, the Commission considered this matter. The Commission has jurisdiction over this matter pursuant to SDCL 49-34A and ARSD 20:10:26.

The Commission finds that TRK's application does not fall within an exception in ARSD Chapter 20:10:26 which would allow a variance from master metering. As the Commission's final decision in this matter, Commissioner Sahr dissenting, it is therefore

ORDERED, that TRK's request for a master metering variance is denied and this docket is closed.

PLEASE TAKE NOTICE that this Final Decision and Order was duly entered on this 27<sup>th</sup> day of September, 2004. Pursuant to SDCL 1-26-32, this Final Decision and Order will take effect 10 days after the date of receipt or failure to accept delivery of the decision by the parties. Pursuant to ARSD 20:10:01:30.01, an application for a rehearing or reconsideration may be made by filing a written petition therefor and ten copies with the Commission within 30 days from the date of issuance of this Final Decision and Order.

Dated at Pierre, South Dakota, this 27<sup>th</sup> day of September, 2004.

<b>CERTIFICATE OF SERVICE</b>
The undersigned hereby certifies that this document has been served today upon all parties of record in this docket, as listed on the docket service list, by facsimile or by first class mail, in properly addressed envelopes, with charges prepaid thereon.
By: <u>Delaine Kelbo</u>
Date: <u>9/27/04</u>
(OFFICIAL SEAL)

BY ORDER OF THE COMMISSION:

ROBERT K. SAHR, Chairman, dissenting

Gary Hanson  
GARY HANSON, Commissioner

James A. Burg  
JAMES A. BURG, Commissioner

## DISSENT OF CHAIRMAN SAHR

At our July 20, 2004, Commission meeting the above-named docket was on the agenda. The action considered by this Commission was whether good cause existed to grant a master metering variance to petitioner TRK Development, Inc. pursuant to ARSD 20:10:26:03(3). The majority voted to not allow the variance. I disagree.

While I fully understand the laudable intent of the rules requiring individual metering, there is also a laudable purpose for the rule allowing variances from individual metering. In short, variances can be granted when installation of individual metering is impractical, uneconomical, or infeasible, or in other words, when master metering just makes good sense.

The petitioner is constructing this building to house low income, elderly tenants. The master metering plans for the building's heating and cooling reflected the petitioner's desire to optimize efficiency and to keep combined capital and operating costs as low as possible. Energy efficient central heating and cooling would do this. It was also reasonably anticipated that apartment-by-apartment usage would vary little with or without individual metering given the ages and lifestyles of the residents. The petitioner stated that the initial cost of compliance was \$8,000, and that ongoing billings would add to that total - all without any recognizable conservation benefits.

The petitioner must also comply with a monthly rent cap which combines rent and utilities, a further erosion to any individual metering benefit as the responsibility that normally goes with individual metering disappears with the rent cap. Consequently, the majority is ordering the imposition of individual metering in a situation where there will be little or no benefit.

Finally, the petitioner noted that a significant number of similar apartments in the community have master metered utility service. This harms both his ability to fairly compete, and to offer his tenants as low a price as possible. It also raises the question about whether other buildings are out of compliance.

These were the facts presented to us at the July 20, 2004, commission meeting. The support for individual metering was based on the rigid language of the rule, and some notion of increased energy efficiency. As stated above, it is clear to me the evidence shows more efficiency with master metering. I therefore respectfully dissent from the majority opinion.