

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

In the Matter of Brent Fallon,)	
)	
Complainant,)	
)	
v.)	Case No. EC-2012-0007
)	
KCP&L Greater Missouri Operations Company,)	
)	
Respondent.)	

**KCP&L GREATER MISSOURI OPERATIONS COMPANY’S
MOTION FOR SUMMARY DISPOSITION AND REQUEST FOR LEAVE TO FILE**

Pursuant to 4 CSR 240-2.117, KCP&L Greater Missouri Operations Company (“GMO” or “Company”) respectfully moves the Missouri Public Service Commission (“Commission”) to grant summary disposition in favor of GMO with respect to the Complaint filed by Complainant. In support thereof, GMO states as follows:

1. On July 5, 2011, Complainant filed a Complaint with the Commission. The Complainant seeks adjustments to several bills due to Complainant’s belief that they do not accurately reflect his electricity usage.

2. Adjustments to customer bills are addressed under a GMO tariff approved by the Commission. GMO’s tariff (Rule 5.04(C) (Sheet R-33)) provides that no billing adjustment will be made if, after the meter is tested, the meter error is found to be less than 3%. Complainant’s meter tests within this 3% standard.

3. Under 4 CSR 240-2.117(1)(A), a motion for summary determination shall not be filed less than sixty days prior to hearing except by leave of the Commission. On September 15, 2011, the Commission set this matter for hearing on October 14, 2011. GMO requests leave to file its Motion for Summary Determination and Memorandum in Support in less than sixty days

prior to the October 14 hearing because the case can be decided without the need of a hearing. The issue in the case is the accuracy of Mr. Fallon's meter. The meter test, as well as the testing methods, can be established by means of an affidavit. Since there is no genuine issue as to any material fact, the time and cost to hold a hearing would be a waste of resources.

4. In further support of this motion, GMO files herewith and incorporates herein by reference its Memorandum in Support of its Motion for Summary Disposition.

WHEREFORE, GMO respectfully requests that the Commission enter an Order granting summary disposition in its favor with respect to Complainant's Complaint.

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner, MO #39586
Kansas City Power & Light Company
1200 Main Street, 16th Floor
Kansas City, MO 64105
Telephone: (816) 556-2314
Facsimile: (816) 556-2787
Email: Roger.Steiner@kcpl.com

Attorney for KCP&L Greater Missouri Operations
Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all parties of record on this 29th day of September, 2011.

/s/ Roger W. Steiner

Attorney for KCP&L Greater Missouri Operations
Company