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

In the Matter of the Applications of KCP&L	)	
Greater Missouri Operations Company for	)	Case No. EO-2010-0211
Authority to Sell its Liberty Service Center	)	

# RESPONSE OF KCP&L GREATER MISSOURI OPERATIONS COMPANY TO STAFF'S RECOMMENDATION

**COMES NOW** KCP&L Greater Missouri Operations Company ("GMO" or "Company"), by and through its attorneys, and hereby files this Response to the Staff's recommendation memorandum filed on February 16, 2010.

- 1. GMO has discussed the February 16 recommendation with Staff and has clarified Staff's intent with regard to the proposed conditions. Company and Staff agree that the Staff's conditions should read as follows:
  - a. Conditions 1, 3 and 4 do not change.
  - b. Condition 2 should now read:

KCPL-GMO and KCPL will notify the Commission's Engineering and Management Services Department Manager prior to the discontinuance of the 24 hour, seven day a week continual customer service coverage relative to the portion of its service territory historically covered by the Liberty Service Center.

#### c. Condition 5 should now read:

In accordance with Commission Orders in Case Nos. ER-2004-0034 and EO-2005-0329, KCPL-GMO and KCPL will continue to submit monthly service quality reporting data to the Staff, including System Average Interruption Duration Index (SAIDI), System Average Interruption Frequency Index (SAIFI) and Customer Average Interruption Duration Index (CAIDI) metrics. KCPL-GMO will provide monthly service quality reports (SAIDI,

SAIFI, CAIDI metrics and specific customer complaint information) consistent with the Commission Order in Case No. EO-2009-0148.

d. Condition 6 should now read:

KCPL-GMO and KCPL agree to seek Commission approval for future service center sales.

e. New Condition 7 should read:

KCPL-GMO and KCPL agree to inform the Staff of the discontinuance of the operations of any service center prior to the discontinuance of operations.

**WHEREFORE,** GMO requests that the Commission issue an order approving the sale of the Liberty Service Center by March 15, 2010.

Respectfully submitted,

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#### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing Response was served via e-mail or first class mail, postage pre-paid, on this 26<sup>th</sup> day of February, 2010 upon:

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