

JAMES M. FISCHER, P.C.

ATTORNEY AT LAW
REGULATORY CONSULTANT

101 WEST McCARTY, SUITE 215
JEFFERSON CITY, MO 65101

TELEPHONE (573) 636-6758
FAX (573) 636-0383

January 11, 2000

FILED

JAN 11 2000

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 3660
Jefferson City, Missouri 65102

Missouri Public
Service Commission

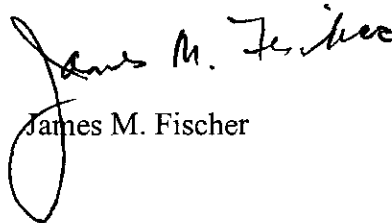
RE: *GST Steel Company v. Kansas City Power & Light Company*
Case No. EC-99-553

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are a faxed original and fourteen (14) copies of Respondent Kansas City Power & Light Company's Motion to Excuse William G. Riggins from the Show Cause Hearing. A copy of the foregoing Motion has been hand-delivered or mailed this date to parties of record.

Thank you for your attention to this matter.

Sincerely,



James M. Fischer

/jr
Enclosures

cc: Parties of Record

FILED

JAN 11 2000

Missouri Public
Service Commission

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

GST STEEL COMPANY,)
)
 Complainant,)
 v.)
)
 KANSAS CITY POWER & LIGHT)
 COMPANY,)
)
 Respondent.)

Case No. EC-99-553

**RESPONDENT KANSAS CITY POWER & LIGHT COMPANY'S
MOTION TO EXCUSE WILLIAM G. RIGGINS FROM THE SHOW CAUSE HEARING**

Kansas City Power & Light Company ("KCPL") respectfully requests that the Commission excuse Mr. William G. Riggins, KCPL's Assistant Chief Legal Officer, from appearing at the Show Cause Hearing currently scheduled for January 18, 2000.

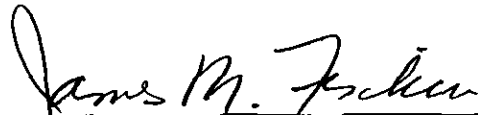
In support of its Motion, KCPL states the following:

1. As the attached Affidavit of Mr. Riggins indicates, he had scheduled prior to the Commission's Show Cause Order of January 6, 2000 meetings with KCPL's regulatory and corporate counsel in Washington, D.C. These meetings had been scheduled for January 17-19 when the Commission's Show Cause Order set a hearing for Tuesday, January 18 at 1:30 p.m.
2. Mr. Riggins attempted to reschedule the meetings after receiving the Commission's Order, but because of the previous commitments made by other attendants, was unable to do so. The significance of the legal and regulatory matters to be addressed at these meetings in Washington, D.C. is such that the meetings cannot be postponed.

3. While Mr. Riggins does appear as counsel of record in this case, the matter has principally been handled by Mr. Gerald A. Reynolds, in-house counsel at KCPL. Mr. Reynolds will be attendance, as will Mr. William H. Koegel. Mr. Koegel, also in-house counsel to KCPL, withdrew as counsel of record in this case on September 9, 1999. All of KCPL's outside counsel will be in attendance.

WHEREFORE, Kansas City Power and Light Company asks that Mr. William G. Riggins be excused from attending the Show Cause Hearing set for January 18, 2000.

Respectfully submitted,



James M. Fischer MO Bar #27543
FISCHER & DORITY, P.C.
101 West McCarty, Suite 215
Jefferson City, Missouri 65101
Telephone: (573) 636-6758
Facsimile: (573) 636-0383

Gerald A. Reynolds Ct. Bar #407871
Law Department
Kansas City Power & Light Company
P.O. Box 418679
Kansas City, Missouri 64141-9679
Telephone: (816) 556-2785
Facsimile: (816) 556-2787

Karl Zobrist MO Bar #28325
Timothy G. Swensen MO Bar # 48594
Blackwell Sanders Peper Martin LLP
2300 Main Street, Suite 1100
Kansas City, Missouri 64108
Telephone: (816) 983-8000
Facsimile: (816) 983-8080

Attorneys for Kansas City Power & Light
Company

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, First Class mail, postage prepaid, this 12th day of January, 2000, to:

Paul S. DeFord
Lathrop & Gage, L.C.
2345 Grand Avenue, Suite 2500
Kansas City, Missouri 64108

James W. Brew
Christopher C. O'Hara
Brickfield Burchette & Ritts, P.C.
8th Floor, West Tower
1025 Thomas Jefferson Street, N.W.
Washington, DC 20007

Dana K. Joyce
Steven Dottheim
Lera L. Shemwell
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

John B. Coffman
Office of the Public Counsel
P.O. Box 7800
Jefferson City, Missouri 65102


James M. Fischer

**AFFIDAVIT
OF
WILLIAM G. RIGGINS**
Assistant Chief Legal Officer
Kansas City Power & Light Company

Case No. EC-99-553

STATE OF MISSOURI)
)
COUNTY OF JACKSON) ss.

1. My name is William G. Riggins. I am Assistant Chief Legal Officer for Kansas City Power & Light Company (KCPL). In that role, I have management responsibility for the Company's legal, regulatory and governmental functions. I also, on occasion, represent KCPL as counsel in regulatory and judicial proceedings, or in other matters.

2. My involvement in this case as counsel for KCPL has been limited to a single instance -- specifically, I assisted in the preparation of a pleading filed by KCPL on December 13, 1999. I assisted in the preparation of that pleading only because Gerald A. Reynolds, KCPL's in-house counsel of record, was unavailable.

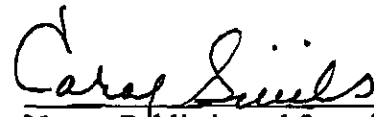
3. Because of my limited involvement as counsel in this case, I had not planned to attend the prehearing conference on January 18, 2000. Accordingly, I previously made arrangements to meet with several members of a Washington, D.C. law firm retained by KCPL to assist it with certain time-sensitive corporate and regulatory matters. The meeting was and is scheduled for January 17-19 in Washington. Given the matters under discussion, my presence at the meeting is required. After receiving the Commission's January 6 Order to Show Cause in this case, I attempted to reschedule the

meeting. However, because of the previous commitments of the other individuals involved, it is not possible to reschedule the meeting and still deal with the issues that need to be considered in a timely fashion.

FURTHER AFFIANT SAITH NOT.


WILLIAM G. RIGGINS

On this 11th day of January, 2000, William G. Riggins, of lawful age, to me personally known, personally appeared before me and having been first duly sworn upon oath, stated that he had read the above and foregoing affidavit and that the facts set forth therein were true to the best of his knowledge and belief, whereupon he subscribed his name thereto in my presence.


Notary Public in and for said
County and State

My Commission expires:

