

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

In the Matter of Union Electric Company, d/b/a)
AmerenUE's Tariffs to Increase Its Annual)
Revenues for Electric Service.) **File No. ER-2010-0036**

**KANSAS CITY POWER & LIGHT COMPANY'S STATEMENT
OF POSITION ON ISSUES TO BE HEARD AT THE DECEMBER 7, 2009
EVIDENTIARY HEARING ON INTERIM RATES**

COMES NOW Kansas City Power & Light Company ("KCP&L"), and hereby files its Statement of Position on the issues to be heard at the December 7, 2009 evidentiary hearing. KCP&L respectfully requests that the Commission accepts its position statement one day out of time. KCP&L apologizes for any inconvenience that this late filing may have caused.

I. Do the circumstances presently encountered by AmerenUE warrant the Commission authorizing AmerenUE interim rate relief as generally proposed by AmerenUE?

KCP&L takes no position on this issue at this time.

a. Should there be criteria for the Commission to use to decide whether interim rate relief is warranted? If so, what should that criteria be?

The Commission already has the discretion to authorize interim rates. This discretion should be exercised on a case by case basis.

II. If the circumstances presently encountered by AmerenUE warrant the Commission authorizing AmerenUE interim rate relief as generally proposed by AmerenUE, has AmerenUE provided adequate justification for the proposed level of interim rate relief?

KCP&L takes no position on this issue at this time.

- b. **Should there be criteria for the Commission to use to determine the appropriate level of interim rate relief? If so, what should that criteria be?**

See response to I.a. above.

- III. If the Commission finds that the circumstances presently encountered by AmerenUE warrant the Commission authorizing AmerenUE interim rate relief as proposed by AmerenUE, may and should the Commission adopt criteria for interim rate relief with greater applicability than the instance case?**

See response to I.a. above.

- IV. Is any interim rate relief criteria other than the emergency/near emergency criteria lawful?**

See response to I.a. above.

WHEREFORE, KCP&L hereby submits the foregoing Statement of Position on Issues with respect to the above-referenced case.

/s/ Roger W. Steiner

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Certificate of Service

I hereby certify that a true and correct copy of the foregoing was e-mailed on this 4th day of December, 2009, to the persons on the Commission's service list in this case.

/s/ Roger W. Steiner
Attorney for Kansas City Power & Light Company