

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

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| Staff of the Missouri Public Service Commission, |) | |
| |) | |
| Complainant, |) | |
| |) | |
| v. |) | Case No. EC-2009-0430 |
| |) | |
| KCP&L Greater Missouri Operations Company and |) | |
| Kansas City Power & Light Company, |) | |
| |) | |
| Respondents. |) | |

**ANSWER AND MOTION FOR DETERMINATION ON THE PLEADINGS OF
KANSAS CITY POWER & LIGHT COMPANY AND
KCP&L GREATER MISSOURI OPERATIONS COMPANY**

Pursuant to 4 CSR 240-2.070(8) and 4 CSR 240-2.117(2) Respondents Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively, the “Companies”), by and through their legal counsel, submit to the Missouri Public Service Commission (“Commission”) the Companies’ answer to the above-captioned complaint (the “Complaint”) submitted by the Staff of the Commission. For the reasons set forth herein, the Commission should deny Staff the relief it seeks and dispose of this matter based on the pleadings.

In support hereof, the Companies offer as follows:

SUMMARY OF COMPLAINT AND ANSWER

1. The gravamen of Staff’s Complaint is that GMO’s use of the “KCP&L” brand is unlawful because “GMO has not sought, and has not obtained, authority from either the Missouri Secretary of State or this Commission to operate under the name ‘KCP&L.’”¹ The Companies respectfully disagree. It is lawful and appropriate for GMO to use the “KCP&L” brand and no

additional authorization is necessary. The Commission's order in the merger proceeding (Case No. EM-2007-0374) and the name change orders authorizing the change from Aquila, Inc. to KCP&L Greater Missouri Operations Company (Case Nos. EN-2009-0015 and EN-2009-0164) provide all the authorization that is required. Staff would have the Companies continue to operate as though they were not under the common ownership and control of Great Plains Energy Incorporated ("Great Plains"), an argument the Commission rejected in the merger proceeding.² Nonetheless, in an attempt to address Staff's concerns, GMO and KCP&L each submitted a Registration of Fictitious Name form with the Missouri Secretary of State, registering "KCP&L" as a fictitious name. Collectively, those registrations indicate that both KCP&L and GMO are doing business under the fictitious name "KCP&L."³

2. Simplified brand names, such as "KCP&L," allow customers and their utility to communicate without the customers having to have intimate knowledge of the cumbersome and often complex corporate structures of the companies serving them.⁴ Significantly, GMO's use of the "KCP&L" brand is consistent with how the Companies explained to their customers they would operate following the close of the merger. Through newspaper ads, billing inserts, and by separate customer mailings, GMO explained to each of its customers that "Aquila is being acquired by Great Plains Energy, *and will operate under the KCP&L brand.*"⁵ Moreover, the Companies clearly explained in the merger proceeding that the operations of the two Companies

¹ Staff Complaint, at ¶ 14.

² Merger Order, at p. 222 ("Although Aquila and KCPL will remain separate legal entities, many of the companies' operational functions will be integrated and centralized after the merger closes."). *See also, id.* at p. 258 ("The Commission believes that the operational integration of KCPL and Aquila will produce substantial benefits for their respective customers.").

³ *See* Attachment 1.

⁴ For example, to effectively communicate with his electric utility a customer living in St. Joseph, Missouri did not need to know that he was served by "Aquila, Inc., dba Aquila Networks – For Territory Served by Aquila Networks – L&P," a division of Aquila, Inc., a Delaware Corporation, as a result of its merger with St. Joseph Light and Power Company, with Aquila, Inc. as the surviving entity. Instead, the customer simply received a bill from "Aquila" and could contact "Aquila" with any questions or concerns regarding his electric service.

would be integrated, with KCP&L acting as the operator.⁶ In fact, the Companies told Staff precisely how they intended to use the “KCP&L” brand.⁷ Simply put, the Companies are operating precisely how they told the Commission and their customers they would operate.

3. With few possible exceptions it would appear that no utility in the state has availed itself of either a formal name change proceeding before the Commission or a fictitious name registration with the Missouri Secretary of State for authorization to use a brand or service mark comprised of a shortened or abbreviated version of the company’s full legal name. To the contrary, as detailed below, it would seem that virtually every utility in the state uses a brand or service mark shortening its full legal name without such authorization or registration.⁸ It is not at all clear why the use of the “KCP&L” brand by Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company is any different.

⁵ See Attachment 2 (emphasis added).

⁶ Merger Order, at p. 226 (“The Application incorporates by reference the prefiled testimony from Great Plains and KCPL’s witnesses that fully outline the specifics of the transaction, including the integration of KCPL and Aquila’s operations.”); Order, at ¶ 571 (“Aquila’s employees will become KCPL employees and services will be provided to Aquila from KCPL, GPES and Great Plains.”); Merger Order, at p. 250 (“KCPL Vice President of Customer Operations William Herdegen explained KCPL’s process and future steps to ensure that customer service and reliability will not deteriorate after the close of the transaction. The strategy is to adopt the KCPL organization design to minimize change as much as possible for combining the two companies’ customer service functions.”); Merger Order, at ¶ 478 (“KCPL will pool the combined operational workforce to more efficiently address customer needs.”); Merger Order, at ¶ 484 (“Currently, both companies serve the Kansas City District from eleven service centers. The combined operation will serve this district from six service centers.”); Merger Order, at ¶ 496 (“The[] five operating areas, although different in customer size and area, will be operated as an integrated organization.”); Merger Order, at ¶ 529 (“A single call center for the new Great Plains customer base will be created. The call center, referred to as the Customer Care Center, will handle all residential and business customer contacts for time-saving, self-service options for any service or account need including service requests, new construction or service upgrades, billing and account information, payment options, and special programs and services.”); Merger Order, at ¶ 250 (“The post-transactional operational model planned by Great Plains will allow the full range of synergies to be accessed.”).

⁷ In a response to a data request from Staff in the merger proceeding asking for presentations made to the Companies’ Integration Planning Leadership Team concerning post-merger operations, the Companies provided material clearly indicating that the “KCP&L” brand “will be used Day 1 on KCPL & Aquila Bills, Notices and Letters.” The pertinent slides for that presentation are attached hereto as Attachment 11.

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See, e.g.,



4. Staff has also failed to demonstrate that any meaningful customer confusion has resulted from GMO's use of the "KCP&L" brand. Staff relies upon "more than 30 public comments" that were submitted to the Commission in KCP&L's and GMO's recent rate cases (Case Nos. ER-2009-0089 and ER-2009-0090, respectively).⁹ However, none of the comments include a complaint about GMO's use of the "KCP&L" brand. Nor does any comment suggest that the customer encountered customer service or other problems as a result of GMO using the "KCP&L" brand. In nearly all cases, the comments contain only an inference of possible confusion. It is important to keep in mind that the comments on which Staff relies represent roughly 0.01% of GMO's 300,000 customers. It is also noteworthy that the Commission has received no complaints concerning GMO's use of the "KCP&L" brand or indicating any customer service issues arising from GMO's use of the brand.¹⁰ The substance and quantity of the public comments do not indicate that there is customer confusion. To the contrary, the lack of any substantive comments concerning the name change demonstrates that no meaningful confusion exists and is more likely a testament to the Companies' efforts to explain their post-merger operations to customers. In fact, data suggests that customer satisfaction among GMO's customers has improved since GMO began operating under the "KCP&L" brand. At the time of the merger, J.D. Power ranked Aquila, Inc. 70th out of 121 utilities. Since the merger, the Companies' consolidated ranking has improved from 37th of 121 utilities to 27th of 121 utilities. The Commission recognized the potential for benefits from consolidating operations under KCP&L.¹¹

⁹ Staff Complaint, at ¶ 28. Staff did not include the public comments on which it relies in its Complaint, but provided a list of them to the Companies in response to a data request. As a result, the comments relied upon by Staff are attached hereto as Attachment 3.

¹⁰ See Attachment 4, Staff's response to Companies Data Request Nos. 005 and 006.

¹¹ Merger Order, at ¶ 476 ("With regard to the effect the merger will have on customers and communities served by KCPL and Aquila in Missouri: (1) KCPL ranks in the top tier of performance in nearly every category typically benchmarked by utilities, including production cost, reliability, distribution cost to serve per customer, and

5. Finally, even assuming some degree of customer confusion does exist, efforts to remedy it would likely lead to additional, longer-lasting confusion, and if successful, would only serve to clarify a distinction that is short lived.¹² As Staff correctly notes, “GPE intends at some future date to seek authorization to merge Respondents GMO and KCPL into KCP&L, Inc., with KCP&L, Inc. surviving.”¹³ As the Companies explained to Staff, KCP&L and GMO plan to seek authorization to merge into a single company, KCP&L, Inc. in the 2011-2012 timeframe.¹⁴ The Companies are exploring the possibility of seeking to merge sooner than that.

6. Practically speaking, to the extent any meaningful customer confusion does exist, efforts to remedy it at this point would likely result in the Companies spending the next two years, or perhaps less, educating customers about the distinction between KCP&L and GMO only to turn around and begin re-educating them about KCP&L, Inc. Given the lack of any adverse impacts attributable to any confusion that might exist, the Companies believe such efforts to distinguish between KCP&L and GMO would cause more harm than good.

7. In sum, GMO’s use of the “KCP&L” brand is lawful, appropriate, and consistent with how the Companies told the Commission and their customers they would operate following the merger. Such use is also consistent with the use of brands or service marks by virtually every utility operating in the state. The Companies concede that GMO is “operating under the ‘KCP&L’ brand,” as the Companies told their customers it would, including use of the brand on customer bills and signage. Such use is the factual basis of Staff’s Complaint, and no material

is nearing top-tier in customer satisfaction; and, (2) it is Great Plains’ and KCPL’s objective to combine management practices and resources to achieve significant reduction in costs and further enhance reliability and customer satisfaction, with rates lower than they would have been had the merger not occurred.”).

¹² Efforts to educate customers would also be expensive. A post card mailer to GMO’s customers, for example, costs in excess of \$100,000.

¹³ Staff Complaint, at ¶ 16.

¹⁴ During the merger proceeding, the Companies explained that there were reasons why they were not seeking to merge KCP&L and Aquila, Inc. at that time, *e.g.*, concerns about exposing KCP&L to potential Aquila liabilities, the fact that KCP&L and Aquila were in different RTOs at the time of the merger. Merger Order, at ¶ 135.

issues of fact exist concerning such use. Consequently, this matter is ripe for resolution by the Commission based on the pleadings.

ANSWER

A. Companies' Response To Count I: GMO's Use Of The "KCP&L" Brand On Customer Bills Is Lawful And Appropriate.¹⁵

8. Staff alleges that GMO's use of the "KCP&L" brand on customer bills is unlawful because such use purportedly violates (i) the Commission's name change order in Case No. EN-2009-0164 and (ii) Section 417.200 concerning the use of fictitious names by companies doing business in Missouri.¹⁶ The Companies respectfully disagree. Although GMO does use the "KCP&L" brand on its bills, it is entirely lawful and appropriate to do so under both the Commission's name change order and Section 417.200. Such use is also consistent with how virtually every utility in the state does business.¹⁷

¹⁵ Except as expressly admitted in this Answer, the Companies deny each and every other allegation contained in the Complaint. The Companies deny the allegations in paragraph 1 of the Complaint. With respect to the allegations contained in paragraph 2 of the Complaint, the Commission rules speak for themselves and no admission or denial is required. The Companies admit the allegations contained in paragraphs 3, 4, 5, 6, 7 and 8 of the Complaint. With respect to the allegations contained in paragraph 9 of the Complaint, Section 386.390.1 speaks for itself and no admission or denial is required. With respect to paragraph 10 of the Complaint, the Companies admit that Staff contacted the Companies but deny all other allegations contained in paragraph 10. With respect to paragraph 11 of the Complaint, the Commission's Order in Case No. EM-2007-0374 speaks for itself and no admission or denial is required. The Companies admit the allegations contained in paragraphs 12 and 13 of the Complaint. The Companies deny the allegations contained in paragraphs 14 and 15 of the Complaint. The Companies admit the allegations contained in paragraph 16 of the Complaint. In response to paragraph 17 of the Complaint, the Companies adopt by reference and re-allege the content of their responses to paragraphs 1 through 16 of the Complaint. In response to paragraph 18 of the Complaint, the Companies admit that bills that included the "KCP&L" brand were issued to GMO's customers. The Companies deny the allegations of paragraphs 19 and 20 of the Complaint. With respect to the allegations of paragraph 21 of the Complaint, Section 417.230 speaks for itself and no admission or denial is required. The Companies deny the allegations contained in the "Wherefore" clause following paragraph 21 of the Complaint.

¹⁶ Staff Complaint, at ¶¶ 19 and 20.

¹⁷ The Companies sought information from Staff concerning Staff's understanding of how other utilities use brands or service marks in Data Request No. 016, which asked "Is Staff aware of any utility operating in Missouri, including, telephone, natural gas, water, or electric utilities, that does not use a brand or service mark to communicate with and bill its customers? If so, please provide the names of those utilities." Staff objected, stating that the data request "seeks a response that is overly broad and burdensome. Staff is aware of many utilities operating in Missouri that do not use a brand name or service mark to communicate with and bill customers. A listing of such utilities is an overly broad and burdensome request. Such information is available on EFIS, which is equally available to respondents, and is available in EFIS as a production of business records."

9. In Case Nos. EN-2009-0015 and EN-2009-0164, the Commission authorized GMO to change the names of both “Aquila, Inc. dba Aquila Networks – L&P” and “Aquila, Inc. dba Aquila Networks – MPS” to “KCP&L Greater Missouri Operations Company.” Consistent with that authorization, GMO is operating under the brand, “KCP&L,” a shortened version of company’s full legal name, KCP&L Greater Missouri Operations Company. Use of such a shortened name is entirely consistent with past practices before the Commission concerning the necessity of formal name change proceedings. Moreover, in the merger proceeding, the Companies explained their intent to have uniform, integrated billing.¹⁸ GMO’s use of the “KCP&L” brand is consistent with the name change authorizations it received in Case Nos. EN-2009-0015 and EN-2009-0164.

10. In addition, no Missouri Court has held that it is necessary under Section 417.200 to register a fictitious name to use a brand or service mark that shortens or abbreviates a company’s full legal name. The purpose of fictitious name registration statutes like Section 417.200 is to ensure fair dealing and prevent fraud or deceit.¹⁹ There is no allegation here of fraud or deceit. Nor has there been a suggestion of a lack of fair dealing between GMO and its customers. To the contrary, the Companies have been completely open about how they intended to operate the Companies and about GMO’s use of the “KCP&L” brand. Through billing inserts and separate mailings, GMO explained to literally each and every one of its customers that “Aquila is being acquired by Great Plains Energy, *and will operate under the KCP&L brand.*”²⁰

¹⁸ Merger Order, at ¶ 530. (“KCPL will evaluate the approaches each company is taking to payment options, to the delivery and printing of bills, and to the information flow from its meter systems *with the intent of creating one approach to the bill process that customers will understand, regardless of geographic location.*” (emphasis added)). In addition, the Commission expressly recognized that “for ratemaking purposes, separate rate bases will be maintained” for KCP&L, GMO (MPS), and GMO (L&P). Merger Order, at ¶ 252. This is how the Companies have operated—one-approach billing under the different rate schedules of KCP&L, GMO (MPS), and GMO (L&P).

¹⁹ *Hanten v. Jacobs*, 684 S.W.2d 433, 437 (Mo. Ct. App. E.D. 1984); 57 Am. Jur. 2d Name § 68.

²⁰ See Attachment 2 (emphasis added).

The Companies also publicized that message in several area newspapers. GMO's use of the "KCP&L" brand is therefore consistent with Section 417.200.

11. A utility's use of a shortened brand or service mark such as "KCP&L" is also consistent with the past practices of GMO's predecessor, Aquila, Inc., as well as the current practices of virtually every other utility operating in Missouri. Prior to the acquisition of Aquila, Inc. by Great Plains, Aquila, Inc. used the "Aquila" brand to serve its electric customers in two distinct service territories under the rate schedules of "Aquila, Inc., dba Aquila Networks – For Territory Served by Aquila Networks – MPS" and "Aquila, Inc., dba Aquila Networks – For Territory Served by Aquila Networks – L&P." Aquila, Inc. had no express authorization from the Commission to do so. Nor had it submitted a fictitious name registration with the Missouri Secretary of State. That practice was in place for several years without incident or complaint. In fact, Staff indicated in response to a data request that "it is not aware of any instances, prior to its acquisition by Great Plains Energy, of Aquila, Inc. operating under an unauthorized or unregistered name."²¹

12. Similarly, as Staff notes in its Complaint, Kansas City Power & Light Company "has not been authorized, by either the Missouri Secretary of State or this Commission, to operate under the fictitious name 'KCP&L,'"²² a practice that has been in place for roughly 100 years without incident or complaint. However, Staff indicated in a response to a data request that "prior to the instances set forth in its Complaint, Staff was not aware that [Kansas City Power & Light Company] operated under an unauthorized or unregistered name."²³ Staff goes on to suggest that it might amend its complaint concerning Kansas City Power & Light Company's use

²¹ Staff Response to Companies Data Request No. 011. *See* Attachment 5.

²² Staff Complaint, at ¶ 15.

²³ Staff Response to Companies Data Request No. 014. *See* Attachment 6.

of the “KCP&L” brand. The Companies would of course contend that KCP&L’s use of the “KCP&L” brand is lawful and appropriate.

13. The use of brands or service marks is not limited to the Companies or their predecessors. The Empire District Electric Company uses the “Empire” brand²⁴ to serve the customers of two distinct but as here affiliated companies, “The Empire District Electric Company” and “The Empire District Gas Company” under separate rate schedules. “Missouri Gas Energy, a Division of Southern Union Company” holds itself out simply as “MGE,” or in some cases “MGE-Missouri Gas Energy.”²⁵ “Laclede Gas Company” uses the brand “Laclede Gas.”²⁶ None of these companies have sought the Commission’s approval of this practice. Nor have they submitted a fictitious name registration with the Missouri Secretary of State.

14. Ameren Corporation uses the “AmerenUE” brand²⁷ to serve customers under the rate schedules of “Union Electric Company Electric Service” and “Union Electric Company Gas Service.” The company did not seek or obtain formal authorization from the Commission to do so. Union Electric Company did, however, file a fictitious name registration with the Secretary of State to do business as “AmerenUE.” That has little bearing on this instant case because Union Electric Company’s submission is consistent with the practice to file such a registration when the fictitious name is wholly unrelated to the legal name, that is, “AmerenUE” is not a shortened or abbreviated version of “Union Electric Company.”

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15. Nearly universally, utilities have used Registration of Fictitious Name submissions following a merger or some other corporate restructuring where the utility did not formally change its legal name.²⁸ In the present case, GMO did formally change its legal name.²⁹ Consequently, a Registration of Fictitious Name was not required. However, as previously noted, in an effort to address Staff's concerns, the Companies have each submitted a Registration of Fictitious Name with the Missouri Secretary of State, indicating each of their intent to do business as "KCP&L."³⁰

16. As detailed in footnote 28, numerous companies whose full legal name includes "AT&T" operate under the "AT&T" brand,³¹ and several companies whose name includes "Verizon" operate under the "Verizon" brand.³² As above, these companies use such simplified

²⁸ For example, Southern Union Company registered the fictitious name "Missouri Gas Energy" following that acquisition. The company has not registered the brand "MGE" as a fictitious name. See Attachment 7. The mergers, acquisitions, and consolidations in the telecommunications area provide numerous additional examples. AT&T Corp. registered the fictitious name "AT&T Advanced Solutions." BellSouth Communication Systems, LLC registered the fictitious name "AT&T Communication Systems Southeast." SBC Internet Services, Inc. registered the fictitious name "AT&T Internet Services." TCG Kansas City, Inc. and TCG St. Louis, Inc. both registered the fictitious name "AT&T Local Network Services." SBC Long Distance, LLC registered the fictitious name "AT&T Long Distance." BellSouth Long Distance, Inc. registered the fictitious name "AT&T Long Distance Service." SNET America, Inc. registered the fictitious name "AT&T Long Distance East." Southwestern Bell Telephone Company registered the fictitious name "AT&T Southwest." Southwestern Bell Telephone registered the fictitious name "AT&T Missouri." New Cingular Wireless PCS, LLC registered the fictitious name "AT&T Mobility." See Attachment 8. All of those companies operate under the "AT&T" brand. MCI metro Access Transmission Services registered the fictitious name "Verizon Access Transmission Services." MCI Communications Services, Inc. registered the fictitious name "Verizon Business Services." Bell Atlantic Communication, Inc. registered the fictitious name "Verizon Long Distance." GTE Midwest Incorporated registered the fictitious name "Verizon Midwest." Verizon Wireless (VAW) LLC, Cellco Partnership, and CyberTel Cellular Telephone Company each registered the fictitious name "Verizon Wireless." See Attachment 9. All of those companies operate under the "Verizon" brand. However, neither AT&T nor Verizon registered its brand or service mark as a fictitious name under Section 417.200. Nor did they seek Commission approval.

²⁹ With its name change filing in Case No. EN-2009-0164 GMO included the formal documents evidencing the name change from Aquila, Inc. to KCP&L Greater Missouri Operations Company, as submitted to the Delaware Secretary of State, as well as its foreign business registration, as submitted to the Missouri Secretary of State. See Attachment 10.

³⁰ See Attachment 1.

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brands or service marks without authorization from the Commission³³ and without registration with the Secretary of State.³⁴

17. In fact, the Companies are unaware of a single instance in which a Missouri utility submitted an application for a name change authorization under the Commission's rules for the purpose of obtaining Commission authorization to use a brand or service mark that shortened or abbreviated the full legal name of the company, as Staff contends GMO should have done here. Staff was unwilling to provide any examples in response to a data request by the Companies.

18. There is nothing nefarious or harmful about utilities using simplified brands or service marks. To the contrary, the use of such a brand makes it easier for a utility to communicate with its customers, thereby reducing confusion, not creating it. An "AmerenUE" customer, for example, is no better served knowing that he or she is served by Ameren Corporation pursuant to the tariffs of Union Electric Company, as filed with the Commission. Brands or service marks help utilities communicate with their customers. It is for this reason that their use appears to be nearly universal among public utilities operating in Missouri.

19. In GMO's case, the Companies are also able to reduce their operating expenses by billing customers identically under the "KCP&L" brand. Common billing stock bearing the "KCP&L" brand is presently used for the Companies' approximately 800,000 customers. Requiring GMO to use separate billing stock for its roughly 300,000 customers would result in additional and in the Companies' opinion unnecessary cost. The Companies believe that given

³³ In Case Nos. CN-2007-0449, IN-2006-0232, XN-2006-0268, XN-2006-0308, XN-2007-0426, the Commission authorized several utilities to change their names to various company names that contain "AT&T," *e.g.*, "BellSouth Long Distance, Inc., d/b/a AT&T Long Distance Service," "Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri," "SBC Long Distance, LLC d/b/a AT&T Long Distance," and "SBC Advanced Solutions, Inc. d/b/a AT&T Advanced Solutions." In Case Nos. LN-2006-0276, XN-2006-0275, XN-2009-0328, XN-2009-0329, the Commission authorized several different utilities to change their names to various company names that contain "Verizon," *e.g.*, "MCI metro Access Transmission Services, LLC d/b/a Verizon Access Transmission Services," "MCI Communications Services, Inc. d/b/a Verizon Business Services," "Verizon Enterprise Solutions LLC," and "Verizon Long Distance LLC."

the choice of lower rates or having this allegedly confusing situation remedied customers would chose lower rates. In addition, it is not as though the Companies' bills are indistinguishable, or that they do not tie back to the Companies' respective Commission-approved rate schedules. To the contrary, KCP&L and GMO maintain different rate schedule codes in their Commission-approved tariffs. KCP&L's codes are referenced on the bills it sends its customers. GMO's codes are referenced on the bills it sends its customers. Consequently, distinguishing between a KCP&L bill and a GMO bill is a simple matter.

20. In sum, Staff's position is that GMO's use of the "KCP&L" brand is unlawful because GMO did not (i) get specific authority from the Commission under 4 CSR 240-2.060(5) to use the "KCP&L" brand or (ii) file "KCP&L" as a fictitious name with the Missouri Secretary of State, which both Companies have recently done. As described above, such steps are not a prerequisite for GMO to use the "KCP&L" brand. Neither the Commission's name change orders, nor Section 417.200 require it. In fact, nearly universally, utilities operating in Missouri use a brand or service mark that shortens or abbreviates the company's full legal name without such authorization or registration. Consequently, if Staff's allegations against the Companies have merit, it would appear that nearly every utility in the state is operating illegally. The level of granularity Staff suggests is not only unnecessary in that it would provide no benefit to customers but it would likely only serve to create confusion and increase costs. For all of these reasons, GMO's use of the "KCP&L" brand on customer bills is lawful and appropriate, and the Commission should dismiss Count I of Staff's Complaint based on the pleadings.

³⁴ See *infra*, note 28 concerning the Fictitious Name Registrations of the various AT&T and Verizon entities.

B. Companies' Response To Count II: GMO's Use Of The "KCP&L" Brand On Signage Is Lawful And Appropriate.³⁵

21. Using the same rationale as applies to Count I, Staff alleges that GMO's use of the "KCP&L" brand on signage at GMO-owned facilities is unlawful because such use again purportedly violates (i) the Commission's name change order in Case No. EN-2009-0164 and (ii) Section 417.200 concerning the use of fictitious names by companies doing business in Missouri.³⁶ Again, the Companies respectfully disagree. Although GMO does use the "KCP&L" brand on signage, it is entirely lawful and appropriate for the Company to do so under both the Commission's name change order and Section 417.200. As explained above, such use is also consistent with how virtually every Missouri utility does business.

22. The Companies explain above why it is lawful and appropriate under both the name change order in Case No. EN-2009-0164 and Section 417.200 for GMO to operate under the "KCP&L" brand. The Companies will not repeat those arguments here but will incorporate them by reference.

23. As discussed above, Missouri utilities universally operate using a brand or service mark that contains only an abbreviated or shortened version of the company's full legal name. Such simplified communication is particularly important on signage, where it would be particularly impractical and would almost always adversely impact the intent of posting signage if a company were required only to use its full legal name. More significantly and as previously explained, GMO expressly notified its customers that "Aquila is being acquired by Great Plains

³⁵ In response to paragraph 22 of the Complaint, the Companies adopt by reference and re-allege the content of their responses to paragraphs 1 through 21 of the Complaint. In response to paragraph 23 of the Complaint, the Companies admit that signs at locations owned by GMO include the "KCP&L" brand. The Companies deny the allegations of paragraphs 24 and 25 of the Complaint. With respect to the allegations of paragraph 26 of the Complaint, Section 417.230 speaks for itself and no admission or denial is required. The Companies deny the allegations contained in the "Wherefore" clause following paragraph 26 of the Complaint.

³⁶ Staff Complaint, at ¶¶ 24 and 25.

Energy, and *will operate under the KCP&L brand*.³⁷ Signage bearing the “KCP&L” brand on GMO-owned facilities is entirely consistent with that statement.

24. GMO’s use of the “KCP&L” brand on signage is also consistent with the authorization granted by the Commission in the merger proceeding for the two Companies to consolidate operations.³⁸ Staff opposed in the merger proceeding the Companies’ proposal to consolidate operations. Staff would have had the Companies operate as though they were not under the common ownership and control of Great Plains. The Commission ruled against Staff, finding “that the operational integration of KCPL and Aquila will produce substantial benefits for their respective customers.”³⁹ The Complaint continues Staff’s argument against the

³⁷ See Attachment 3 (emphasis added).

³⁸ Merger Order, at p. 226 (“The Application incorporates by reference the prefiled testimony from Great Plains and KCPL’s witnesses that fully outline the specifics of the transaction, including the integration of KCPL and Aquila’s operations.”); Merger Order, at p. 222 (“Although Aquila and KCPL will remain separate legal entities, many of the companies’ operational functions will be integrated and centralized after the merger closes.”); Merger Order, at ¶ 568 (“Although Aquila and KCPL will remain separate legal entities, many of the companies’ operational functions will be integrated after the merger closes.”); Merger Order, at ¶ 571 (“Aquila’s employees will become KCPL employees and services will be provided to Aquila from KCPL, GPES and Great Plains.”); Merger Order, at ¶ 476 (“With regard to the effect the merger will have on customers and communities served by KCPL and Aquila in Missouri: (1) KCPL ranks in the top tier of performance in nearly every category typically benchmarked by utilities, including production cost, reliability, distribution cost to serve per customer, and is nearing top-tier in customer satisfaction; and, (2) it is Great Plains’ and KCPL’s objective to combine management practices and resources to achieve significant reduction in costs and further enhance reliability and customer satisfaction, with rates lower than they would have been had the merger not occurred.”); Merger Order, at p. 250 (“KCPL Vice President of Customer Operations William Herdegen explained KCPL’s process and future steps to ensure that customer service and reliability will not deteriorate after the close of the transaction. The strategy is to adopt the KCPL organization design to minimize change as much as possible for combining the two companies’ customer service functions.”); Merger Order, at ¶ 478 (“KCPL will pool the combined operational workforce to more efficiently address customer needs.”); Merger Order, at ¶ 482 (“The combined service territory will be divided into geographic areas known as districts. Within each district employees will operate from multiple service centers.”); Merger Order, at ¶ 484 (“Currently, both companies serve the Kansas City District from eleven service centers. The combined operation will serve this district from six service centers.”); Merger Order, at ¶ 496 (“The[] five operating areas, although different in customer size and area, will be operated as an integrated organization.”); Merger Order, at ¶ 529 (“A single call center for the new Great Plains customer base will be created. The call center, referred to as the Customer Care Center, will handle all residential and business customer contacts for time-saving, self-service options for any service or account need including service requests, new construction or service upgrades, billing and account information, payment options, and special programs and services.”).

³⁹ Merger Report and Order, p. 258. See also, Merger Order, at ¶ 250 (“The post-transactional operational model planned by Great Plains will allow the full range of synergies to be accessed.”); Merger Order, at p. 234 (“Based upon the Commission’s findings of fact, the total operational synergies projected to result from the proposed transaction are \$305 million over the first 5-year period. The total synergies created through the first ten years are \$755 million. On a Missouri jurisdictional basis, the total synergies are equal to \$549 million for 10 years,

consolidated operation of KCP&L and GMO. As the Commission rejected that argument in the merger proceeding, it should reject it again here.

25. GMO's operation under the "KCP&L" brand is consistent with how it told its customers it would operate, how the Commission authorized it to operate in the merger proceeding and name change orders. Such use is also consistent with the requirements of Section 417.200. For these reasons, GMO's use of the "KCP&L" brand on signage is lawful and appropriate, and the Commission should dismiss Count II of Staff's Complaint based on the pleadings.

C. Companies' Response To Count III: GMO's Use Of The KCP&L Brand Is Not an "Unjust" or "Unreasonable" Act Under Section 393.130(5).⁴⁰

26. Staff alleges that GMO's use of the "KCP&L" brand is "unjust and unreasonable" in violation of Section 393.130(5) because such use allegedly causes customer confusion.⁴¹ Staff requests the Commission to "order that Respondent GMO operate henceforward as 'KCP&L Greater Missouri Operations Company,' and that Respondent KCPL henceforward operate GMO as 'KC&L Greater Missouri Operations Company,' unless lawful authority is duly sought and obtained to operate under some other name."⁴²

27. As a preliminary matter, the Companies would note that both KCP&L and GMO now have on file with the Missouri Secretary of State Fictitious Name Registrations indicating that both intend to operate under the fictitious name, "KCP&L."⁴³ Such registration constitutes

with \$222 million expected during the first 5 years."); Merger Order, at p. 238 ("the resulting synergies from the operational integration of KCPL and Aquila will afford substantial benefits to the companies' customers.").

⁴⁰ In response to paragraph 27 of the Complaint, the Companies adopt by reference and re-allege the content of their responses to paragraphs 1 through 26 of the Complaint. The Companies deny the allegations contained in paragraphs 28, 29, and 30 of the Complaint. The Companies deny the allegations contained in the "Wherefore" clause following paragraph 30.

⁴¹ Staff Complaint, at ¶¶ 28-30.

⁴² Staff Complaint, at p. 9.

⁴³ See Attachment 1.

the “lawful authority” Staff asserts the Companies require and therefore renders moot Staff’s request for relief in Count III of its Complaint.

28. More important, however, is the fact that Staff provides no evidence of the type of customer confusion that would render GMO’s use of the “KCP&L” brand “unjust and unreasonable.” Missouri courts have not opined on the types of acts that would be unjust or unreasonable under Section 393.130(5). Historically, however, the requirements of Section 393.130 have been enforced to address more tangible issues, such as a utility charging rates other than those authorized by the Commission or to address a utility’s undue discrimination among similarly situated customers.⁴⁴ In no case, has a Missouri court interpreted Section 393.130(5) to prohibit a utility from using a brand or service mark. Nor has the Commission. Without prior guidance from the courts or the Commission, one must consider the language of the statute, its intended purpose, and common sense. Presumably, an act is only “unjust” or “unreasonable” under Section 393.130(5) if it has a material or adverse impact on customers. Neither is the case here. There is no evidence of meaningful confusion among GMO’s customers and there is no evidence of any harm to GMO’s customers.

29. Staff’s sole basis for the alleged confusion is “more than 30 public comments” submitted in KCP&L’s and GMO’s recent rate cases, Case Nos. ER-2009-0089 and ER-2009-0090, respectively, in which a GMO customer referenced “KCP&L.”⁴⁵ What the comments say is interesting, but what they do not say is perhaps more noteworthy. The comments do not include complaints about GMO’s use of the “KCP&L” brand being confusing. They do not include complaints about customer service issues arising from GMO’s use of the “KCP&L”

⁴⁴ *City of Joplin v. Missouri Pub. Serv. Comm.*, 186 S.W.3d 290 (Mo. Ct. App. WD 2005); *GS Technologies Operating Co., Inc. v. Missouri Pub. Serv. Comm.*, 116 S.W.3d 680 (Mo. Ct. App. WD 2003); *Marco Sales, Inc. v. Missouri Pub. Serv. Comm.*, 685 S.W.2d 216 (Mo. Ct. App. WD 1984); *Ashcroft v. Missouri Pub. Serv. Comm.*, 674 S.W.2d 660 (Mo. Ct. App. WD 1984).

brand. In fact, they do not contain any complaints about GMO's use of the "KCP&L" brand whatsoever. In nearly all cases, Staff's allegation of confusion is based simply on a GMO customer's reference to "KCP&L." Such references to "KCP&L" do not demonstrate confusion, but rather demonstrate that the Companies' message has gotten through that GMO is being operated under the "KCP&L" brand. It is also worth repeating that the public comments represent about 0.01% of GMO's customers, hardly evidence of the type of confusion that would render GMO's actions "unjust and unreasonable."

30. KCP&L and GMO now have on file with the Missouri Secretary of State Fictitious Name Registrations indicating that both intend to operate under the fictitious name, "KCP&L," which satisfies Staff's request that GMO seek and obtain lawful authority to operate under the "KCP&L" brand. Moreover, there is no evidence of customer confusion that would warrant such use being treated as an unjust or unreasonable act. For these reasons, the Commission should dismiss Count III of Staff's Complaint based on the pleadings.

D. Companies' Response To Count IV: GMO's Use Of The "KCP&L" Brand Is Not Contrary To Its Rate Schedules On File With The Commission.⁴⁶

31. Staff alleges that GMO's use of the "KCP&L" brand is inconsistent with its filed tariffs. Specifically, Staff asserts that GMO's use of the "KCP&L" brand is unlawful because "the schedule of rates of Respondent GMO is not maintained under the name 'KCP&L'; nor are any rates maintained under that name."⁴⁷ The Companies respectfully disagree. The statute and

⁴⁵ Those comments in their entirety are attached hereto as Attachment 3.

⁴⁶ In response to paragraph 31 of the Complaint, the Companies adopt by reference and re-allege the content of their responses to paragraphs 1 through 30 of the Complaint. With respect to the allegations in paragraphs 32 and 33 of the Complaint, Section 393.140(11) and 4 CSR 240-3.145 speak for themselves and no admission or denial is required. The Companies admit that GMO's schedule of rates are filed with the Commission under the name "KCP&L Greater Missouri Operations Company." The Companies deny all other allegations contained in paragraph 34 of the Complaint. The Companies admit the allegation contained in paragraph 35. The Companies deny the allegation contained in paragraphs 36 and 37 of the Complaint. The Companies deny the allegations contained in the "Wherefore" clause following paragraph 37 of the Complaint.

⁴⁷ Staff Complaint, at ¶ 35.

Commission regulation cited by Staff, Section 393.140(11) and 4 CSR 240-3.145, require a utility to have its tariffs on file with the Commission. GMO has done so. Significantly, neither Section 393.140(11) nor 4 CSR 240-3.145 prohibit GMO from using the “KCP&L” brand to communicate with its customers.

32. The Companies are not aware of a public utility operating in Missouri that only communicates with its customers using the formal name provided on the utility’s tariffs. Prior to the merger, for example, Aquila, Inc. used the “Aquila” brand to communicate with its customers despite the fact its tariffs bore the names “Aquila, Inc. dba Aquila Networks – L&P” and “Aquila, Inc. dba Aquila Networks – MPS.” In addition, Ameren Corporation presently uses the “AmerenUE” brand to communicate with its customers despite the fact its tariffs bear the names “Union Electric Company Electric Service Missouri Service Area” and “Union Electric Company Gas Service Missouri Service Area.” The Empire District Electric Company uses the “Empire” brand despite the fact its tariffs bear the name “The Empire District Electric Company.” The Empire District Gas Company also uses the “Empire” brand despite the fact its tariffs bear the name “The Empire District Gas Company.” Southern Union Company uses the “MGE” brand, or in some cases “MGE-Missouri Gas Energy,” despite the fact its tariffs bear the name “Missouri Gas Energy, a Division of Southern Union Company.” Laclede Gas Company uses the brand “Laclede Gas” despite the fact its tariffs bear the names “Laclede Gas Company.” It is not at all clear how GMO’s use of the “KCP&L” brand is any different when its tariffs bear the name “KCP&L Greater Missouri Operations Company” (emphasis added).

33. There is no requirement that utilities only communicate with their customers using the formal name provided on the utilities’ tariffs. In fact, it would appear that no utility in

the state does so. The Commission should therefore dismiss Count IV of Staff's Complaint based on the pleadings.

D. Companies' Response to Count V: Even if the Commission Ultimately Concludes That GMO's Use of the "KCP&L" Brand Is Somehow Unlawful, Penalties Are Not Called For.⁴⁸

34. Even if the Commission ultimately concludes that GMO's use of the "KCP&L" brand somehow violates Missouri law, use of the brand does not constitute the type of malfeasance that warrants a penalty. The Companies acted in good faith based upon how they believed the Commission authorized them to operate in the name change orders and merger proceeding. Moreover, there is no allegation here of fraud or deceit. Nor has there been a suggestion of a lack of fair dealing between GMO and its customers. In fact, the Companies have operated precisely how they told their customers they would operate, with GMO operating under the "KCP&L" brand. As detailed above, GMO's use of the "KCP&L" brand is also consistent with how other Missouri utilities communicate with their customers.

35. Perhaps most importantly, there is no evidence of customers being harmed in any way by GMO's use of the "KCP&L" brand. There is no evidence of customer service issues that have resulted from GMO's use of the brand. In fact, there is no evidence of any meaningful confusion. Staff's allegation of confusion is premised solely upon "more than 30 public comments" in which a GMO customer makes reference to "KCP&L." Such references do not demonstrate confusion, but rather demonstrate that GMO is being operated under the "KCP&L" brand, which in fact it is.

⁴⁸ In response to paragraph 38 of the Complaint, the Companies adopt by reference and re-allege the content of their responses to paragraphs 1 through 37 of the Complaint. With respect to the allegation of paragraphs 39 and 40 of the Complaint, Sections 386.570 and 386.600 speak for themselves and no admission or denial is required. The Companies deny the allegations contained in the "Wherefore" clause following paragraph 40 of the Complaint.

36. Neither the intent behind nor the impact of GMO's use of the "KCP&L" brand warrant the imposition of penalties. The Companies acted in good faith and there is no harm to customers. Simply put, there is none of the bad acts or effects that penalties are designed to address. For these reasons, the Commission should reject Staff's request to authorize its General Counsel to proceed in Circuit Court to seek penalties.

AFFIRMATIVE DEFENSES

37. Pursuant to Commission Rule 4 CSR 240-2.070(8), the Companies provide the following additional grounds of defense, both of law and fact, in further answer and response to the Complaint.

- a. The Complaint fails to set forth facts showing that the Complainant is entitled to the relief prayed for and fails to state a claim upon which relief can be granted against the Companies;
- b. The matters alleged in the Complaint address activities exclusively reserved to the informed management of the Board of Directors and officers of the Companies. The Commission's authority to regulate the Companies' operations does not include the authority to manage its day to day affairs;
- c. The Complaint is barred by the equitable principles of estoppel and laches because the Companies explained to the Commission in the merger proceeding (EM-2007-0374) that the operations of the two Companies would be integrated, with KCP&L acting as the operator;

MOTION FOR DETERMINATION ON THE PLEADINGS

38. There are no material issues of fact concerning GMO's use of the "KCP&L" brand. Precisely as it explained to its customers, GMO is operating under the "KCP&L" brand.

Therefore, the question before the Commission is a legal one, not a factual one, *i.e.*, is GMO's use of the "KCP&L" brand lawful? As explained above, GMO's use of the "KCP&L" brand is not only lawful, but is consistent with how virtually every utility in the state operates. This matter is ripe for Commission determination on the pleadings, as provided for in 4 CSR 240-2.117(2), and the Companies respectfully request that the Commission find that GMO's use of the "KCP&L" brand is lawful and deny Staff the relief it seeks.

Respectfully submitted,

/s/ Curtis D. Blanc

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Chief Legal Officer and General Counsel
Curtis D. Blanc, MBN 58052
Corporate Counsel - Regulatory
Kansas City Power & Light Company
1201 Walnut
Kansas City, MO 64106
Telephone: (816) 556-2785
email: Bill.Riggins@kcpl.com
email: Curtis.Blanc@kcpl.com

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101 Madison Street, Suite 400
Jefferson City, MO 65101
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Facsimile: (573) 636-0383
email: jfischerpc@aol.com

Karl Zobrist, MBN 28325
Roger Steiner
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4520 Main Street, Suite 1100
Kansas City, MO 64111
Telephone: (816) 460-2545
Facsimile: (816) 531-7545
email: kzobrist@sonnenschein.com
email: rsteiner@sonnenschein.com

**Counsel for Kansas City Power & Light Company and
KCP&L Greater Missouri Operations Company**

Dated June 26, 2009

TABLE OF ATTACHMENTS

1. Registrations of Fictitious Name of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company to use the name “KCP&L”
2. Postcard Mailed to GMO Customers, Indicating that “Aquila is Being Acquired by Great Plains Energy, and will operate under the KCP&L brand”
3. Response of Staff to Companies Data Request No. 004, Indicating the Public Comments on Which Staff’s Allegation of Customer Confusion Is Premised and Copies of Those Public Comments
4. Response of Staff to Companies Data Request Nos. 005 and 006, Indicating the Commission Has Not Received Any Complaints Concerning GMO’s Use of the “KCP&L” Brand
5. Response of Staff to Companies Data Request No. 011
6. Response of Staff to Companies Data Request No. 014
7. Registration of Fictitious Name of Southern Union Company to use the name “MISSOURI GAS ENERGY”
8. Registrations of Fictitious Name for “AT&T” Entities
9. Registrations of Fictitious Name for “Verizon” Entities
10. Delaware Secretary of State Registration of Name Change from Aquila, Inc. to KCP&L Greater Missouri Operations Company and Missouri Secretary of State Foreign Corporation Authorization of KCP&L Greater Missouri Operations Company
11. Pertinent Slides from the Integration Planning Leadership Team Presentation Provided to Staff Concerning the Companies’ Intended Use of the “KCP&L” Brand.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing response was served via e-mail or first class mail, postage pre-paid, on this 26th day of June 2009, upon:

Kevin Thompson
Missouri Public Service Commission
P.O. Box 360
200 Madison St., Suite 800
Jefferson City, Missouri 65102

Lewis Mills
Office of Public Counsel
P.O. Box 7800
200 Madison St., Suite 640
Jefferson City, Missouri 65102

Secretary and Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Missouri 65102

/s/ *Curtis D. Blanc*
Curtis D. Blanc

ATTACHMENT 1



State of Missouri
Robin Carnahan, Secretary of State

File Number: 200915290703

X00972130

Date Filed: 06/01/2009

Expiration Date: 06/01/2014

Robin Carnahan

Secretary of State

Registration of Fictitious Name

This fictitious name filing shall expire 5 years from the date filed unless a renewal filing is submitted within 6 months prior to the expiration date.

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. (Chapter 417, RSMo)

The undersigned is doing business under the following name, and at the following address:

Business name to be registered: **KCP&L**
Business address: **1201 Walnut**
City, State and Zip Code: **Kansas City MO 64106**

If all parties are jointly and severally liable, percentage of ownership need not be listed.

| Name of Owners, Individual or Business Entity | Street and Number | City and State | Zip Code | If listed, Percentage of ownership must equal 100% |
|--|---------------------------|-----------------------|-----------------|---|
| KANSAS CITY POWER & LIGHT COMPANY | 1201 Walnut Street | Kansas City MO | 64106 | 100% |

In Affirmation thereof, the facts stated above are true:

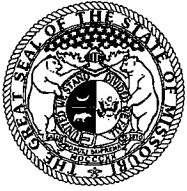
(The undersigned understands that false statements made in this filing are subject to the penalties of a false declaration under Section 575.060, RSMo)

Mark English

(Authorized Signature)

Assistant Secretary

(Authorized Party Relationship)



State of Missouri
Robin Carnahan, Secretary of State

File Number: 200915290683

X00972125

Date Filed: 06/01/2009

Expiration Date: 06/01/2014

Robin Carnahan

Secretary of State

Registration of Fictitious Name

This fictitious name filing shall expire 5 years from the date filed unless a renewal filing is submitted within 6 months prior to the expiration date.

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. (Chapter 417, RSMo)

The undersigned is doing business under the following name, and at the following address:

Business name to be registered: **KCP&L**
Business address: **1201 Walnut**
City, State and Zip Code: **Kansas City MO 64106**

If all parties are jointly and severally liable, percentage of ownership need not be listed.

| Name of Owners, Individual or Business Entity | Street and Number | City and State | Zip Code | If listed, Percentage of ownership must equal 100% |
|---|--------------------|----------------|----------|---|
| KCP&L GREATER MISSOURI OPERATIONS COMPANY | 1201 Walnut Street | KANSAS CITY MO | 64106 | 100% |

In Affirmation thereof, the facts stated above are true:

(The undersigned understands that false statements made in this filing are subject to the penalties of a false declaration under Section 575.060, RSMo)

Mark English

(Authorized Signature)

Assistant Secretary

(Authorized Party Relationship)

ATTACHMENT 2

Welcome to the KCP&L family.

Aquila is being acquired by Great Plains Energy, and will operate under the KCP&L brand

How to reach us, effective mid-July

To report emergencies or outages —

1-888-4LIGHT-KC (644-4632)

For service-related needs or billing questions —

Metropolitan Kansas City: (816) 471-KCP&L (5275)

Toll-free: 1-888-471-KCP&L (5275)

Complete account- and service-related assistance, outage reporting and bill payment information is available online at: www.kcp&l.com



Front

Focused on the future

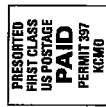
We're delighted to announce that all approvals have been received for our acquisition of Aquila. Starting in mid-July, KCP&L will be your new electric utility company. We have provided innovative, reliable and competitively priced electric service for more than 125 years and we are looking forward to serving you.

Additional information about KCP&L will be mailed to you in the next few weeks. To make it easy for you to contact us at that time, we have included our phone numbers on the front of this postcard.

Important Note: If you are an Aquila customer, you will continue to receive your electric bill with an Aquila logo for a short period of time — *do not discard it and please remit your payment from that invoice*. Over the next few weeks, you'll begin to notice a transition from Aquila to the KCP&L brand.



5-01-00001-00000



Back

Postcard mailed to
Legacy Aquila
Customers

ATTACHMENT 3

The Staff of the Missouri Public Service Commission vs. KCP&L Greater Missouri Operations Company and Kansas City Power and Light Company

Case No. EC-2009-0430

Data Request No. 004:

Please provide copies of the "more than 30 public comments" referenced in paragraph 28 of Staff's Complaint. Please indicate which of those public comments if any included complaints about KCP&L Greater Missouri Operations Company using the "KCP&L" brand.

Answer:

Public Comments are accessible in EFIS.

P200900443
P200900449
P200900657
P200900666
P200900671
P200900674
P200900676
P200900693
P200900703
P200900704
P200900709
P200900710
P200900731
P200900743
P200900749
P200900750
P200900754
P200900780
P200900797
P200900798
P200900808
P200900810
P200900814
P200900823
P200900832
P200900836
P200900838
P200900839
P200900843
P200900846
P200900850
P200900853
P200900860
P200900861

**The Staff of the Missouri Public Service Commission vs. KCP&L Greater
Missouri Operations Company and Kansas City Power and Light Company**

Case No. EC-2009-0430

P200900862
P200900863
P200900865
P200900866
P200900867
P200900870
P200900871
P200900884
P200900894
P200900896
P200900903
P200901107
P200901120
P200901121
P200901139
P200901165

The comments speak for themselves.

Signature:


Lena Mantle

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900443 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company-Investor (Electric) |
| First Name | Neal |
| Middle Initial | N/A |
| Last Name | Summers |
| Street Address | 18805 E 192nd Terrace |
| Mailing Address | N/A |
| City | Pleasant Hill |
| State | MO |
| County | N/A |
| Phone No. | 816-540-3742 Ext - |
| Email | nsummerssmbc@aol.com |
| Case No. | ER-2009-0090 |
| Public Comments Description | (cld) see attached- |
| Date Filed | 1/2/2009 11:28:06 AM |

From: Mantle, Lena
Sent: Friday, January 16, 2009 4:49 PM
To: 'nsummerssmbc@aol.com'
Subject: KCPL Rate Case
Mr. Summers,

I received your comments regarding the rate increase request of KCP&L-GMO (formerly known as Aquila.) I understand that you believe that the rate increase request is due to KCP&L's merger with Aquila. However, KCP&L did not merge with Aquila. Aquila was acquired by Great Plains Energy, the parent company of KCP&L. KCP&L-GMO is a separate company from KCP&L.

The primary drivers for the rate increase for the rate increase are plant additions necessary to meet loads and emissions equipment required by federal law for the Sibley coal unit. Aquila would have filed for rate increase if it had not be acquired by Great Plains Energy due to these large investments.

The Commission Staff is in the process of auditing KCP&L-GMO's books, records and planning processes. We, along with the Office of the Public Counsel and other intervenors in the case will present to the Commission the amount that we believe KCP&L-GMO's rates should be increased. Typically, but not always, it is less than what the utility asks for. It can not be more than the utility requests.

Hearings have been set for the Commission will take the evidence and then they will take the evidence that is presented to them and determine how much KCP&L-GMO's rates need to be increased to allow KCP&L-GMO an opportunity to earn a return on its investments. In addition, public hearings will be held where ratepayers, such as you, can testify before the Commission. KCP&L-GMO should soon provide an announcement with your bill regarding these public hearings.

I hope this helps you understand the process. Feel free to contact me if you have any questions.

Lena Mantle
Energy Department Manager
Missouri Public Service Commission
573-751-7520

Dunham, Courtney

From: nsummerssmbc [nsummerssmbc@aol.com]
Sent: Friday, January 02, 2009 10:09 AM
To: PSC Info (Public Info Email Address) - PSC
Subject: KCPL rate increase proposal

Public Service Commission,

I am a resident in Cass Co. Missouri. We are part of the Aquila customer base that was switched over to KCPL this last year. As an Aquila customer, we had seen increases the last 2 years straight of approximately 12% per billable KWH. Now we are being burdened with another 16% increase. KCPL states that their customer base has not seen increases for several years and this increase is needed to continue their operations. I, as I'm sure many of the former Aquila customers, don't feel like this is a fare increase for us. To be saddled with another double digit percentage increase. This increase would equate to a 45% increase over the last 3 years. That far exceeds all reasonable rate changes do to current energy costs. I am upset that the former Aquila customers should be forced into another rate increase. When KCPL offered to purchase them there should have been a hold on increases do to the past couple of years and protect us the Missouri customer from being over burdened. If this Commission truly has the best interest of the public then it will not allow this increase to effect the newly aquired areas that have already paid increases. I am not aware that KCPL changed our rate after the take over to coincide with their energy rates that had not been increased over several years. To include us in their request, it would have on been fare if we had been afforded the rates that current KCPL customers have.

Please let me know if I am wrong in my assumptions. I appreciate your service to listen to the customers that will be effected the most. I am a rural customer who's entire house is electric so the effect this has on my pocketbook is far above that of the normal customer. KCPL's own estimator shows me to have peak month increases of over \$30 per bill. I am faced with several hundreds of dollars per year again after seeing increases the last two years. I have only lived in this rural area for 3 years now and have seen increases every year.

Thank you,
Neal Summers
18805 E 192nd Terrace
Pleasant Hill, MO 64080
816-540-3742

Missouri Public Service Commission
Public Comments Report

Date : 6/22/2009

Case No. : P200900449

| Company | Name | City | State |
|-----------------------------|-------------|-------------|--------------|
| Osage Water Company-(Sewer) | Mark Tade | Camdenton | MO |

Comments: My letter is postmarked December 23, 2008?? A 100% rate increase is fraud We should not pay for the mistakes of a bunch of crooks 75-80% of the owners are not full time, but still pay for monthly water & Sewer.

Total Public Comment(s): 1

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900657 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | LLoyd |
| Middle Initial | N/A |
| Last Name | Schnakenberg |
| Street Address | 204 South Oak Street |
| Mailing Address | N/A |
| City | Cole Camp |
| State | MO |
| County | N/A |
| Phone No. | N/A |
| Email | N/A |
| Case No. | ER-2009-0090 |
| Public Comments Description | (cld) August of 2008 we got a letter from KCPL that there will be no increase in this transaction. This will create savings that will be passed on to the customer. Then we just got a notice saying there may be an increase in our rates. I think that they should cut out buying sports tickets and pass that on to the customers. |
| Date Filed | 2/9/2009 11:34:02 AM |

Missouri Public Service Commission**Public Comments**Public Comment No. **P200900666**Utility Type **Electric**Utility Company **Kansas City Power &
Light Company-
Investor(Electric)**First Name **Geneva**Middle Initial **C**Last Name **Stevens**Street Address **413 East Elm**Mailing Address **N/A**City **Hardin**State **MO**County **N/A**Phone No. **N/A**Email **N/A**Case No. **ER-2009-0090**

Public Comments Description **(cld) I will soon be turning 79, I live on SS disability. I like the deal that they gave me on the budget plan. It's hard to put food on the table. It is just me and my son. Sometimes I run out by the end of the month. There are a lot of people using KCPL they should need more money.**

Date Filed **2/10/2009 4:37:24 PM**

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900671 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | David |
| Middle Initial | N/A |
| Last Name | Moriconi |
| Street Address | 1616 NW Weatherstone Drive |
| Mailing Address | N/A |
| City | Blue Springs |
| State | MO |
| County | |
| Phone No. | 816-665-5346 Ext - |
| Email | N/A |
| Case No. | ER-2009-0090 |
| Public Comments Description | (cld) see attached |
| Date Filed | 2/11/2009 8:19:26 AM |

Dunham, Courtney

From: David Moriconi [dlmor@sbcglobal.net]
Sent: Tuesday, February 10, 2009 5:14 PM
To: Dunham, Courtney
Subject: RE: KCPL proposed rate increase

David Moriconi
1616 NW Weatherstone drive
Blue Springs, Mo 64015

Jackson County, Mo

Yes I was an Aquilia customer

816.665.5346

David Moriconi
M3 Real Estate Inspection, LLC
816.665.5346
www.m3inspect.com
ASHI Certified Member
iNACHI Certified Residential Inspector
NRSB Certified Radon Measurement Specialist Certified Mold Inspector

-----Original Message-----

From: Dunham, Courtney [mailto:courtney.dunham@psc.mo.gov]
Sent: Tuesday, February 10, 2009 4:54 PM
To: 'David Moriconi'
Cc: Poole-King, Contessa; Warren, Derl
Subject: RE: KCPL proposed rate increase

Dear Mr. Moriconi,

Thank you for contacting our office. I understand your concerns and would be happy to file your comments in the official case file of the Missouri Public Service Commission. As a part of the official case file, the Commission will be able to view all public comments for consideration. In order to do this I will need a little more information from you. Could you please provide your address, city & county, and a contact phone number. To get your complaint into the correct case I will also need to know if you were a former Aquila customer.

If you have any questions please feel free to contact our office at (800) 392-4211.

Sincerely,

Consumer Services Specialist
Missouri Public Service Commission

-----Original Message-----

From: David Moriconi [mailto:dlmor@sbcglobal.net]
Sent: Tuesday, February 10, 2009 4:32 PM
To: PSC Info (Public Info Email Address) - PSC
Subject: KCPL proposed rate increase

I am writing to oppose any rate increase by KCPL. Yes isn't nice that KCPL wants to keep its profits the same in this depressed economy. I wish I could keep doing the same volume of business each year with a captive cliental, a customer base that can go nowhere else to get the service.

I hope you deny this rate increase for a company that produces much of its electric energy by burning foreign oil. What is KCPL doing to reduce its dependency on foreign oil?

My business and income has decreased 60% in the last 12 months do to all the economy issues, I for one do not have the extra money to pay KCPL more. They need to tighten their belts, become more efficient like the rest of the common people.

Has 1 KCPL executive given up salary raises or have they reduced their salaries? I bet not.

Please reject their request and tell them to squeeze more power from less oil

Thank you

David Moriconi
M3 Real Estate Inspection, LLC
816.665.5346
www.m3inspect.com
ASHI Certified Member
iNACHI Certified Residential Inspector
NRSB Certified Radon Measurement Specialist Certified Mold Inspector

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900674 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | Diana |
| Middle Initial | N/A |
| Last Name | Richardson |
| Street Address | 821 SW Lake Pines Drive |
| Mailing Address | N/A |
| City | Lees Summit |
| State | MO |
| County | |
| Phone No. | 816-537-4488 Ext - |
| Email | N/A |
| Case No. | ER-2009-0090 |
| Public Comments Description | (cld) see attached- |
| Date Filed | 2/11/2009 10:47:27 AM |

Dunham, Courtney

From: eric richardson [el_rich@sbcglobal.net]
Sent: Wednesday, February 11, 2009 9:49 AM
To: Dunham, Courtney
Subject: Re: Rate Increase

Below is the information you requested:

Diana Richardson
821 S.W. Lake Pines Dr.
Lee's Summit, MO 64082

County - Cass

Phone - 816-537-4488

Yes, I was an Aquila customer.

Thank you for your attention to this matter.

From: "Dunham, Courtney" <courtney.dunham@psc.mo.gov>
To: eric richardson <el_rich@sbcglobal.net>
Cc: "Poole-King, Contessa" <contessa.king@psc.mo.gov>; "Warren, Derl" <derl.warren@psc.mo.gov>
Sent: Wednesday, February 11, 2009 9:43:34 AM
Subject: RE: Rate Increase

Dear Ms. Richardson,

Thank you for contacting our office. I understand your concerns and would be happy to file your comments in the official case file of the Missouri Public Service Commission. As a part of the official case file, the Commission will be able to view all public comments for consideration. In order to do this I will need a little more information from you. Could you please provide your address, city & county, and a contact phone number. To get your complaint into the correct case I will also need to know if you were a former Aquila customer.

2/11/2009

If you have any questions please feel free to contact our office at (800) 392-4211.

Sincerely,

Consumer Services Specialist

Missouri Public Service Commission

From: eric richardson [mailto:el_rich@sbcglobal.net]
Sent: Wednesday, February 11, 2009 9:36 AM
To: PSC Info (Public Info Email Address) - PSC
Subject: Rate Increase

To whom it may concern:

We just received notice from KCP&L regarding an increase in our electric bill.

I have never complained outwardly before, however, I simply will not sit quietly on this one. I cannot believe, with times being such as they are, that KCP&L would even try this. This is absolutely outrageous. The audacity of these people. It's probaly just going into some top executives pocket anyway! I have two final words --

NOT NOW!

Sincerely,

Diana Richardson

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900676 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | Thomas |
| Middle Initial | N/A |
| Last Name | Allen |
| Street Address | 1420 S. Barrett |
| Mailing Address | N/A |
| City | Sedalia |
| State | MO |
| County | |
| Phone No. | N/A |
| Email | N/A |
| Case No. | ER-2009-0089 |
| Public Comments Description | see attached |
| Date Filed | 2/11/2009 11:01:52 AM |

7 Feb., 2009

Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102

RECEIVED²

FEB 11 2009

*Records
Public Service Commission*

To whom it may concern;

KCP&L is asking for a rate increase, I say emphatically HELL NO! If anything in these economic times, they should be lowering their rates.

You people are supposed to be representing we Missourians, not some utility monopoly, especially a company that wants to raise our rates so that they can pay out \$4.3 million in bonuses to senior executives and most outrageous, to use our money to buy tickets to Worlds Of Fun and to pay for golfing fees and tickets to Kansas City Chiefs games. This is utterly outrageous! In addition, they claim they want to keep the company "competitive". They are a MONOPOLY in KC, Sedalia, and other places. They are not competing against anyone.

On another subject, you folks need to get onto the Natural Gas industry re their outrageous high prices. My heating bill this month is over \$434 dollars for a medium-sized house. There are too many middlemen sucking up profits for themselves and driving up our costs while doing practically nothing to actually produce or deliver the gas to our homes.

I urge you to **DENY** the KCP&L request for a rate increase and instead, to pressure them and the gas companies to lower their rates.

Very truly yours,



Thomas Allen
1420 S. Barrett
Sedalia, MO 65301

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900693 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | Lisa |
| Middle Initial | N/A |
| Last Name | Sheahon |
| Street Address | 1151 SW Kimstin Court |
| Mailing Address | N/A |
| City | Blue Springs |
| State | MO |
| County | |
| Phone No. | 816-229-1768 Ext - |
| Email | N/A |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)Customer opposed - former Aquila customer - customer feels that increase is outrageous in this economy // see attached |
| Date Filed | 2/13/2009 1:11:10 PM |

Warren, Derl

From: Lisa K Sheahon [lsheah1@hallmark.com]
Sent: Friday, February 13, 2009 11:18 AM
To: Warren, Derl
Subject: RE: KCP&L proposed increase

I appreciate your reply. My address is 1151 SW Kimstin Court, Blue Springs, Jackson County, 816-229-1768. I am a former Aquila customer.

Thanks you.
Lisa

"Warren, Derl"
<derl.warren@psc.
mo.gov>

02/13/2009 10:05
AM

"Lisa K Sheahon"
<lsheah1@hallmark.com>

To

cc

"Dunham, Courtney"
<courtney.dunham@psc.mo.gov>,
"Poole-King, Contessa"
<contessa.king@psc.mo.gov>

Subject

RE: KCP&L proposed increase

Dear Ms. Sheahon:

Thank you for contacting our office. I understand your concerns and would be happy to file your comments in the official case file of the Missouri Public Service Commission. As a part of the official case file, the Commission will be able to view all public comments for consideration. In order to do this I will need a little more information from you. Could you please provide your address, city & county, and a contact phone number. To get your complaint into the correct case I will also need to know if you were a former Aquila customer.

If you have any questions please feel free to contact our office at (800) 392-4211.

Sincerely,

Consumer Services Specialist

PSC Consumer Services
Phone: 1-800-392-4211

-----Original Message-----

From: Lisa K Sheahon [mailto:lsheah1@hallmark.com]

Sent: Thursday, February 12, 2009 12:25 PM

To: opcservice@ded.mo.gov; PSC Info (Public Info Email Address) - PSC

Subject: KCP&L proposed increase

I received the notification from KCP&L RE: their requested increase which would cost residential consumers an additional \$100 to \$150 annually.

This is absolutely outrageous! Millions of people have lost their jobs and that number continues to grow. Many of those fortunate enough to remain employed are doing so at reduced wages in an effort to keep their companies open. Families are cutting back on spending to make ends meet and stay in our homes so for KCP&L to have the gall to request an increase of this magnitude at this time of economic disaster is beyond belief. They must do as families across the nation are doing and that means looking for cost savings within themselves rather than taking the easy solution of passing the increases on to their consumers that is not an option for us.

Lisa Sheahon

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Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900703 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | Brian |
| Middle Initial | N/A |
| Last Name | Edwards |
| Street Address | Not Provided |
| Mailing Address | N/A |
| City | Carrollton |
| State | MO |
| County | |
| Phone No. | 999-999-9999 Ext - |
| Email | N/A |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)See attached - former Aquila customer - customer opposes rate increase in a weakened economy and wants KCPL to consider the efficiency of its own workforce/ |
| Date Filed | 2/17/2009 11:05:16 AM |

Warren, Derl

From: Brian Edwards [brian.edwards@plantpioneer.com]
Sent: Saturday, February 14, 2009 9:06 PM
To: PSC Info (Public Info Email Address) - PSC
Subject: KCP&L Rate Increase

To whom it may concern:

I believe that the rate increase of 17.5% for KCP&L customers is unnecessary. As a small business owner we have felt the effects of a weakened economy and we are fearful of increasingly tough times ahead. This is not the time for our utility provider to be passing along the costs of their recent acquisition to their customers. Many working class families are having enough of a hard time trying to keep ahead of increasing costs and are already making sacrifices and cuts to their family spending and saving plans for the future. I realize that utilities are important, especially in the rural area that I live in, but I do believe that cost saving measures could be found from within and healthy competition in the industry might ultimately provide better service and value to the customers which they serve. I think that consumers are tired of the rate increases without seeing any return for their investment, except for the new trucks and equipment that KCP&L keeps buying. Management might consider the efficiency and effectiveness of their workforce, benefit packages and how they could implement asset utilization plans to better control their cost structure instead of continually passing the buck to their customer who has no choice of who provides their power.

Thank you,

Brian Edwards
Carrollton, MO 64633

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Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900704 |
| Utility Type | Electric |
| Utility Company | KCP&L Greater Missouri Operations Company-Investor (Electric) |
| First Name | Phyllis |
| Middle Initial | N/A |
| Last Name | Brewer |
| Street Address | 5333 Ralston |
| Mailing Address | N/A |
| City | Raytown |
| State | MO |
| County | N/A |
| Phone No. | N/A |
| Email | N/A |
| Case No. | ER-2009-0090 |
| Public Comments Description | (cld) see attached |
| Date Filed | 2/17/2009 11:16:20 AM |

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FEB 17 2009

2-12-09

Public Service

Records
Public Service Commission

I am a 78 year old Widow
I use about the same Electric
year round except for air
conditioner & furnace
I have KCP&L for Electric
and they have ask for a raise
well they have already raised
my lights usually run \$31 +
to \$33 a month month

this one I paid was \$41⁰⁰
and the month before that is
\$52⁰⁰, I live alone & have the
same appliances & T.V. as always
so there should not be that much
change.

and besides you just gave
agula a raise just before
KCP&L took over.

I don't think they should get
the raise, times are getting

Hard for everyone, so why
can't they make do like
the rest of us.

its very easy for you to
sit in your office and push
your pen to a yes or no. for
them, the way its going
they just charge what ever
they want to.

they said if they had to
make a extra trip to read
the meter it would cost me
\$12.50, so I would be paying
them to do their job.

every one I know is complaining
about their light bills so
something has to be wrong
somewhere.

Phyllis Brewer

Phyllis M. Brewer
5333 Ralston
Raytown, MO 64133-2835



Public Service Commission
P.O. Box 340

65102+0360

Jefferson City Mo-
65102

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|---|
| Public Comment No. | P200900709 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | Michael |
| Middle Initial | N/A |
| Last Name | Graham |
| Street Address | 1018 South Dunn |
| Mailing Address | N/A |
| City | Maryville |
| State | MO |
| County | |
| Phone No. | 999-999-9999 Ext - |
| Email | N/A |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)Former Aquila customer opposed to rate increase and unable to attend LPH - see attached |
| Date Filed | 2/17/2009 12:15:30 PM |

Warren, Derl

From: Michael Graham [mgraham1944@gmail.com]
Sent: Friday, February 13, 2009 5:21 PM
To: opcservice@ded.mo.gov; PSC Info (Public Info Email Address) - PSC
Subject: electric rates

I will be unable to attend the hearing on March 4 at St. Joseph. However, I would like to comment that the proposed increase is untimely, to say the very least. When I read in the newspapers that KCP&L is spending money on frivolous items such as Worlds of Fun, I become outraged. In these economic times, why would a public entity even consider a rate increase? While a \$10 increase for 1,000 kilowatt hours of electricity seems small to you, it results in a much larger increase each month for those of us who are being billed for 3,666 kilowatt hours per month. To me, this is unacceptable.

Michael Graham
1018 South Dunn
Maryville MO 64468

2/17/2009

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|---|
| Public Comment No. | P200900710 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | Terri |
| Middle Initial | N/A |
| Last Name | Baumgardner |
| Street Address | Not Provided |
| Mailing Address | N/A |
| City | Blue Springs |
| State | MO |
| County | |
| Phone No. | 816-224-4154 Ext - |
| Email | pakutakc@msn.com |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)Customer opposed to rate increase in this economy and wants KCPL to pursue alternative energy projects/ see attached/ called customer and found out she was a former Aquila customer/ |
| Date Filed | 2/17/2009 2:23:26 PM |

Warren, Derl

From: Terri Baumgardner [pakutakc@msn.com]
Sent: Tuesday, February 17, 2009 1:37 PM
To: PSC Info (Public Info Email Address) - PSC
Subject: KCPL Hearing

I just rec'd KCP&L's notice for a rate increase along with this email address to comment. I do not want my monthly bill to increase - at all - much less the proposed \$12.50 per month.

With the economy like it is, and the cost of everything on the rise, I would like it if you would keep KCPL's rates as is. I also would like to see KCPL do more with alternative energy to reduce their environmental impact and the cost to an individual for energy.

Thanks you,

Terri Baumgardner
p. 816.224.4154
c. 816.651.5754
e. pakutakc@msn.com

2/17/2009

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|---|
| Public Comment No. | P200900731 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | Lewis |
| Middle Initial | N/A |
| Last Name | Wing |
| Street Address | Not Provided |
| Mailing Address | N/A |
| City | Ridgeway |
| State | MO |
| County | |
| Phone No. | 999-999-9999 Ext - |
| Email | lwing@grm.net |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)Customer upset over potential KCPL GMO rate increase - elderly on fixed income - see attached |
| Date Filed | 2/19/2009 12:38:06 PM |

Warren, Derl

From: lewiswing [lwing@grm.net]
Sent: Thursday, February 19, 2009 12:27 PM
To: PSC Info (Public Info Email Address) - PSC
Subject: POWER INCREASE

KCPL asking for a power increase in the area they just aquired from OQUILA INC.
I was not aware that Oquila was needing a increase, now KCP&L has furnaced power in our area for only a few months and needs a 14% increase

I live in Ridgeway on a fixed income where or school cost almost \$90,000 dollars a year per student, our power cost over a \$100 a month, our heat in the winter runs almost \$ 200 amonth, my medication copay averages \$ 56 a month plus Taxes that run over \$ 1000 a year suplementry health is \$ 209 month, Insurance for pickup & house is over \$60 a month plus the cot of food going up every day. Tell me how I can stand a 14% increase in power on a \$ 1300 a month income.

Please consider that most of the people in Ridgeway are on a fixed income that is below the poverty class.

Lewis Wing

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900743 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | KarenAnn |
| Middle Initial | N/A |
| Last Name | Denson |
| Street Address | 702 Lexington Road |
| Mailing Address | N/A |
| City | Pleasant Hill |
| State | MO |
| County | |
| Phone No. | 816-874-4600 Ext - 262 |
| Email | tracking@schult.com |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)Former Aquila customer opposed to rate increase/ says it is criminal for KCPL to ask in this economy/ see attached |
| Date Filed | 2/20/2009 1:49:35 PM |

Warren, Derl

From: Tracking [tracking@schult.com]
Sent: Friday, February 20, 2009 1:42 PM
To: Warren, Derl
Cc: Dunham, Courtney; Poole-King, Contessa
Subject: RE: RATE HIKES

My address is 702 Lexington Road Pleasant Hill MO 64080-1106, work phone 816.874.4600 x 262, cell phone 816.588.2757 and I was indeed an Aquila customer. Thank you.

KarenAnn Denson

Schult Industries, LLC
Toll Free: 800.783.8998
Fax: 816.874.4607
www.schult.com

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From: Warren, Derl [mailto:derl.warren@psc.mo.gov]
Sent: Friday, February 20, 2009 12:33 PM
To: Tracking
Cc: Dunham, Courtney; Poole-King, Contessa
Subject: RE: RATE HIKES

Dear KarenAnn Denson:

Thank you for contacting our office. I understand your concerns and would be happy to file your comments in the official case file of the Missouri Public Service Commission. As a part of the official case file, the Commission will be able to view all public comments for consideration. In order to do this I will need a little more information from you. Could you please provide your address, city & county, and a contact phone number? To get your complaint into the correct case I will also need to know if you were a former Aquila customer.

If you have any questions please feel free to contact our office at (800) 392-4211.

Sincerely,

Consumer Services Specialist

Missouri Public Service Commission

2/20/2009

From: Tracking [mailto:tracking@schult.com]
Sent: Friday, February 20, 2009 12:29 PM
To: OPCSERVICE@DED.MO.GOV
Cc: PSC Info (Public Info Email Address) - PSC
Subject: RATE HIKES

I think in these times of economic hardship it is criminal for KCP&L to ask for a rate hike. People can barely afford to keep their bills paid and a roof over their heads and now they want to more money for themselves. I say "Shame on them". I'm sure some corporate big wig is getting a nice bonus or a well deserved vacation home thanks to his great idea to further rape the middle class! I totally oppose this action.

KarenAnn Denson

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|---|
| Public Comment No. | P200900749 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | Richard |
| Middle Initial | N/A |
| Last Name | Myers |
| Street Address | 1013 Hawethorne Drive |
| Mailing Address | N/A |
| City | Liberty |
| State | MO |
| County | |
| Phone No. | 816-415-4918 Ext - |
| Email | rm4kc@yahoo.com |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)Former Aquila Customer - see attached - customer says KCPL asking for increase in this economy is greedy/ customer has accounts in MO and Kansas/ see attached. |
| Date Filed | 2/23/2009 9:05:47 AM |

Warren, Derl

From: Rich M [rm4kc@yahoo.com]
Sent: Sunday, February 22, 2009 12:02 PM
To: Warren, Derl
Subject: Re: [Released] Proposed 14% rate increase for KCP&L

I am a former Aquila customer.
My address is 1013 Hawthorne Drive, Liberty, MO 64068 Clay county
phone # 816-415-4918.

I also own an investment property in Kansas at 7830 W 61st Terrace in OPKS.

Richard Myers

From: "Warren, Derl" <derl.warren@psc.mo.gov>
To: Rich M <rm4kc@yahoo.com>
Cc: "Dunham, Courtney" <courtney.dunham@psc.mo.gov>; "Poole-King, Contessa" <contessa.king@psc.mo.gov>
Sent: Friday, February 20, 2009 8:08:51 AM
Subject: RE: [Released] Proposed 14% rate increase for KCP&L

Dear Richard Myers:

Thank you for contacting our office. I understand your concerns and would be happy to file your comments in the official case file of the Missouri Public Service Commission. As a part of the official case file, the Commission will be able to view all public comments for consideration. In order to do this I will need a little more information from you. Could you please provide your address, city & county, and a contact phone number. To get your complaint into the correct case I will also need to know if you were a former Aquila customer.

If you have any questions please feel free to contact our office at (800) 392-4211.

Sincerely,

Consumer Services Specialist

Missouri Public Service Commission

From: Rich M [mailto:rm4kc@yahoo.com]
Sent: Thursday, February 19, 2009 1:26 PM
To: opcservice@ded.mo.gov; PSC Info (Public Info Email Address) - PSC
Subject: [Released] Proposed 14% rate increase for KCP&L

As a KCP&L customer in both Kansas and Missouri, I strongly believe that the Missouri Public Service Commission should deny KCP&L's request to increase their rate by 14%. The sole purpose of this proposed increase is to inflate KCP&L's profits by \$83 million. With current rates, KCP&L already posts high profits-this is not a case of a needed increase to meet higher expenses-it's simple greed. With the current economic chaos, this is not the right time to increase customer's utility

2/23/2009

rates. If KCP&L needs higher profits, it needs to cut it's internal costs to reduce expenses. Please deny this increase and tell KCP&L to tighten its belt like all its customers are having to do during this economic upheaval.

Richard Myers

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900750 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | Ron |
| Middle Initial | N/A |
| Last Name | Keyes |
| Street Address | Not Provided |
| Mailing Address | N/A |
| City | Platte City |
| State | MO |
| County | |
| Phone No. | 999-999-9999 Ext - |
| Email | keyesfamily@att.net |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)Former Aquila - see attached - customer feels that increase is not needed in this time of lowering energy prices and wants to know if Aquila merger affected this request. |
| Date Filed | 2/23/2009 9:23:48 AM |

Warren, Derl

From: Ron Keyes [keyesfamily@att.net]
Sent: Sunday, February 22, 2009 10:14 AM
To: PSC Info (Public Info Email Address) - PSC
Subject: KCP&L Rate Increase Request

My comments:

Would this rate increase have been necessary had KCP&L **not** taken over Aquila? Why should former Aquila customers be required to bail out KCP&L?

The rate increase KCP&L indicates would be ~14% does not jive with my calculations. Based on my previous usage, this rate increase is more like ~21%.

How can, in this time of falling prices for energy, a rate increase be justified?
Is KCP&L losing money in non-utility related business ventures that consumers/users should not be liable for?
What measures has KCP&L taken to keep their costs down?

As a customer of the former MoPub and Aquila, I don't see an improvement in service. That wouldn't be possible either unless a long term (3 years or more) of statistical evidence is collected.

We citizens rely upon you, the Missouri Public Service Commission, to also represent us in dealing with the monopolies and their whims; we as individuals wouldn't be heard otherwise.

Thanks!
Ron Keyes
Platte City, MO

2/23/2009

Missouri Public Service Commission**Public Comments**Public Comment No. **P200900754**Utility Type **Electric**Utility Company **Kansas City Power & Light
Company-Investor(Electric)**First Name **Melody**Middle Initial **N/A**Last Name **Damour**Street Address **10825 East 57th Street**Mailing Address **N/A**City **Raytown**State **MO**

County

Phone No. **816-737-5192 Ext -**Email **melody.damour@twcable.com**Case No. **ER-2009-0090**Public Comments
Description **(ddw)see attached - cusotmer opposed to rate increase - customer
beleives rate increase is too much to ask for and has problems with
Commissioner Davis.**Date Filed **2/23/2009 10:15:10 AM**

Warren, Derl

From: Damour, Melody [melody.damour@twcable.com]
Sent: Monday, February 23, 2009 10:05 AM
To: Warren, Derl
Cc: Dunham, Courtney; Poole-King, Contessa
Subject: RE: KCPL Rate Increase

I am a former Aquila customer ~

My home address is:

Melody DaMour
10825 E 57th St
Raytown, MO 64133-2901
Jackson County
816-737-5192

From: Warren, Derl [mailto:derl.warren@psc.mo.gov]
Sent: Monday, February 23, 2009 10:02 AM
To: Damour, Melody
Cc: Dunham, Courtney; Poole-King, Contessa
Subject: RE: KCPL Rate Increase

Dear Melody Damour:

Thank you for contacting our office. I understand your concerns and would be happy to file your comments in the official case file of the Missouri Public Service Commission. As a part of the official case file, the Commission will be able to view all public comments for consideration. In order to do this I will need a little more information from you. Could you please provide your address, city & county, and a contact phone number? To get your complaint into the correct case I will also need to know if you were a former Aquila customer.

If you have any questions please feel free to contact our office at (800) 392-4211.

Sincerely,

Consumer Services Specialist

Missouri Public Service Commission

2/23/2009

From: Damour, Melody [mailto:melody.damour@twcable.com]
Sent: Monday, February 23, 2009 9:58 AM
To: PSC Info (Public Info Email Address) - PSC
Subject: FW: KCPL Rate Increase

MPSC,

Why should I have to pay for KCP&L's extravagances? In the most financially trying times we have had in a several decades, let's screw the little guy/average consumer even more and make us pay for buying Aquila, tickets for the Chiefs, Worlds of Fun and the damages from getting a guy killed at their new Weston plant. Oh, I forgot the wind turbines lying on the ground in Kansas. That will be quite a bill for us to 'eat'.

Jeff Davis should recuse himself from anything to do with KCPL or MPSC. In my opinion, his actions were not in the best interest of the public and what he does from here on is tainted. It's true, it's better to be on somebody's payroll, than not.

Please, please leave the rates alone or cut the 14% down to 4% or 5% something we can live with.

Melody DaMour
10825 E 57th St
Raytown, MO
melody.damour@twcable.com

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2/23/2009

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Missouri Public Service Commission

Public Comments

| | |
|--------------------------------|---|
| Public Comment No. | P200900780 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | Michael |
| Middle Initial | N/A |
| Last Name | Thornton |
| Street Address | Not Provided |
| Mailing Address | N/A |
| City | Lees Summit |
| State | MO |
| County | |
| Phone No. | 999-999-9999 Ext - |
| Email | N/A |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)Former Aquila customer - opposed to rate increase - feels his bill would increase by 20 to 35 rather than the advertised \$10/ see attached |
| Date Filed | 2/25/2009 9:34:00 AM |

Missouri Public Service Commission**Public Comments**Public Comment No. **P200900797**Utility Type **Electric**Utility Company **KCP&L Greater
Missouri Operations
Company-Investor
(Electric)**First Name **Nick**Middle Initial **N/A**Last Name **Moore**Street Address **311 S. Mclane**Mailing Address **N/A**City **Clinton**State **MO**County **N/A**Phone No. **N/A**Email **N/A**Case No. **ER-2009-0090**Public Comments
Description **(cld) Since the economic hard times are upon us and families are
having a hard time making ends meet. I fill that an increase will put
people out of there homes. I feel that KCPL could do some cut backs
just like other businesses and families are doing.**Date Filed **3/2/2009 8:42:06 AM**

Missouri Public Service Commission

Public Comments

Public Comment No. P200900798

Utility Type Electric

Utility Company KCP&L Greater
Missouri Operations
Company-Investor
(Electric)

First Name Gladys

Middle Initial N/A

Last Name Bratton

Street Address 1416 NE Blackwell
Road

Mailing Address N/A

City Lees Summit

State MO

County N/A

Phone No. N/A

Email N/A

Case No. ER-2009-0090

Public Comments Description (cld) In all the information that was sent to the customers before the buy out they said that rates would not be raised. I think they are using terminology so they can get around it. I don't think that in this time that rates need to be raised. Many people are on a fixed income and that's not going up. It is just ridicules. I think the rates are high enough and they need to back off. Once they get the rates raised the taxes will also go up which means double the amount that we will be paying.

Date Filed 3/2/2009 9:04:51 AM

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900808 |
| Utility Type | Electric |
| Utility Company | KCP&L Greater Missouri Operations Company- Investor(Electric) |
| First Name | Arlene |
| Middle Initial | N/A |
| Last Name | Richmond |
| Street Address | n/a |
| Mailing Address | N/A |
| City | Lees Summit |
| State | MO |
| County | N/A |
| Phone No. | N/A |
| Email | richmonda@earthlink.net |
| Case No. | ER-2009-0090 |
| Public Comments Description | (cld) see attached- |
| Date Filed | 3/3/2009 9:48:31 AM |

Dunham, Courtney

From: richmonda@earthlink.net
Sent: Tuesday, March 03, 2009 12:02 AM
To: opcservice; PSC Info (Public Info Email Address) - PSC
Subject: Case #ER-2009-0090

I was at the public hearing that was held in Lee's Summit tonight (March 2nd) regarding the possible rate hike by KCP&L of Kansas City.

There were quite a few people who got up to testify & the majority of those that spoke were against such a big rate hike.

I agree with them all in view of our economy. We are in hard times now & it is not going to get any better. This is the worst time for the electric company to raise rates (especially as high as they are wanting to raise them). There were interesting comments by those that spoke. Many suggested that if they have to raise the rates, start out at a lower rate & then over the years, spread out the rate increases, but, don't hit Missouri with such a huge rate hike all at one time. KCP&L is supposed to represent the best interests of their customers. They are there to serve. This will not be helpful.

Since KCP&L took over Aquila, they have no competition now. They have a larger base of customer's (such as myself). In view of that, that should have brought a lot more money for KCP&L. It seems like, perhaps, that since there is no competition, KCP&L can do as they please since there is nowhere for any of us to turn for electric service. They have us over a 'barrel' & perhaps, they know this. It is not good.

I trust you will go by the 'will of the people' on this matter. The majority of the public do not want this rate hike; nor can we afford it.

Thank you for your time,

Arlene Richmond

richmonda@earthlink.net
EarthLink Revolves Around You.

3/3/2009

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900810 |
| Utility Type | Electric |
| Utility Company | KCP&L Greater Missouri Operations Company-Investor (Electric) |
| First Name | Mike |
| Middle Initial | N/A |
| Last Name | Clay |
| Street Address | 6119 Harvard |
| Mailing Address | N/A |
| City | Raytown |
| State | MO |
| County | |
| Phone No. | N/A |
| Email | mrc250@sbcglobal.net |
| Case No. | ER-2009-0090 |
| Public Comments Description | (cld) see attached |
| Date Filed | 3/3/2009 9:55:29 AM |

Dunham, Courtney

From: Mike & Joyce Clay [mrc250@sbcglobal.net]
Sent: Monday, March 02, 2009 9:36 PM
To: opcservice@ded.mo.gov; PSC Info (Public Info Email Address) - PSC
Subject: KCPL Rate Increase

We would like to express our concern regarding the proposed KCPL rate increase. In the current economic times when everyone is being asked to do more with less we feel it would be very inappropriate to grant a rate increase to a public utility. People all over our city are losing their jobs, and sometimes even their homes. Companies are being told that they must reduce costs if they are to continue to maintain their current business accounts. Employees are being asked to take pay cuts, benefit cuts, or both in order to maintain their jobs. In the midst of these economic conditions we don't see how you can, in good conscience, allow any rate increase and especially one of this magnitude.

Thank you for your consideration of our comments.

Sincerely,
Mike and Joyce Clay
6119 Harvard
Raytown, MO 64133

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900814 |
| Utility Type | Electric |
| Utility Company | KCP&L Greater Missouri Operations Company-Investor (Electric) |
| First Name | Rob |
| Middle Initial | N/A |
| Last Name | Stitt |
| Street Address | 1629 NE Tawny Drive |
| Mailing Address | N/A |
| City | Lees Summit |
| State | MO |
| County | N/A |
| Phone No. | N/A |
| Email | N/A |
| Case No. | ER-2009-0090 |
| Public Comments Description | (cld) see attached |
| Date Filed | 3/3/2009 11:00:05 AM |

Dunham, Courtney

From: Rob Stitt [rob@robstitt.com]
Sent: Monday, March 02, 2009 5:19 PM
To: 'Brian Yates'
Cc: PSC Info (Public Info Email Address) - PSC
Subject: KCP&L Rate Case Info Session Tonight
Signed By: rob@robstitt.com

Rep.Yates:

I am quite troubled by this rate request. I thought there were some assurances that KCPL wasn't going to raise rates like this when some issues came up a few years ago. This type of massive rate increase greatly exceeds the rate of inflation--and greatly exceeds the increase of my pay over the past several years.

I'm deeply concerned that KCPL is taking the "easy way out" by raising rates rather than looking at ways to reduce their costs. Given the PSC's past attitude towards utilities, it isn't surprising. It seems that utilities almost always get what they ask for--they seem to have quite the cozy relationship with the PSC (while the PSC has a cold and distant relationship to the citizens they are supposed to be serving).

Unfortunately, I cannot make the rate request hearing tonight. Do you know of any other avenue for me to express my concerns?

Sincerely,

...Rob Stitt
1629 NE Tawny Dr
Lees Summit MO 64086-5948

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|---|
| Public Comment No. | P200900823 |
| Utility Type | Electric |
| Utility Company | KCP&L Greater Missouri Operations Company-Investor (Electric) |
| First Name | Carolyn |
| Middle Initial | N/A |
| Last Name | Jones |
| Street Address | 1807 N 13th Street |
| Mailing Address | N/A |
| City | St. Joseph |
| State | MO |
| County | N/A |
| Phone No. | 816-233-4546 Ext - |
| Email | N/A |
| Case No. | ER-2009-0090 |
| Public Comments Description | Opposed to rate increase. With the current economic crisis, it is unthinkable that KCPL would ask for a rate increase. They are on a fixed income and money is already tight. They can't afford a rate increase. |
| Date Filed | 3/3/2009 1:21:45 PM |

Missouri Public Service Commission**Public Comments**Public Comment No. **P200900832**Utility Type **Electric**Utility Company **KCP&L Greater
Missouri Operations
Company-Investor
(Electric)**First Name **Ronald**Middle Initial **N/A**Last Name **Dowty**Street Address **n/a**Mailing Address **N/A**City **Warsaw**State **MO**County **N/A**Phone No. **N/A**Email **N/A**Case No. **ER-2009-0090**

Public Comments
Description **(cld)There are people on SSI and we did not get a raise. But yet KCPL and other companies want to raise, raise, raise their prices. I see KCPL employees eating donuts and drinking coffee at 8:00 in the morning. Breaktime is at 10:00 not first thing in the morning. The people are paying for this laziness. People are getting to where they can not afford to buy food.**

Date Filed **3/4/2009 8:23:42 AM**

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900836 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company-Investor (Electric) |
| First Name | Linda |
| Middle Initial | N/A |
| Last Name | Davis |
| Street Address | 1000 East 13th Street |
| Mailing Address | N/A |
| City | Sedalia |
| State | MO |
| County | |
| Phone No. | 660-826-6867 Ext - |
| Email | davis.linda79@yahoo.com |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)See attached - former Aquila - customer on fixed income and feels increase would be a hardship and recommends that the utility tighten its belt instead/ |
| Date Filed | 3/4/2009 10:31:28 AM |

Warren, Derl

From: Linda Davis [davis.linda79@yahoo.com]
Sent: Wednesday, March 04, 2009 10:25 AM
To: PSC Info (Public Info Email Address) - PSC
Subject: KCP&L rate increase

I just read in The Sedalia Democrat about KCP&L wanting to raise electric rates. I am on Social Security and I oppose the rate raise. I did receive heating assistance this winter but that was for my primary heat which is gas. I do have to keep a small electric heater barely on in my laundry room to keep pipes from freezing. I also only heat my kitchen, bathroom and bedroom, I rent my home and it is not well insulated at all. In the summer I do not use my window air conditioners unless I am having company.

We all have to cut back and be more responsible, that means big business, Government, and Utility Companies, as well.

Thank You,

Linda Davis
1000 East 13th St.
Sedalia, Mo. 65301
phone: 660-826-6867

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|---|
| Public Comment No. | P200900838 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | Martin |
| Middle Initial | N/A |
| Last Name | Phillips |
| Street Address | 414 S Holden Street |
| Mailing Address | N/A |
| City | Warrensburg |
| State | MO |
| County | Johnson |
| Phone No. | 999-999-9999 Ext - |
| Email | N/A |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)Customer opposed - retired stock broker in my 80`s and remembers the Great Depression/ feels KCPL should be cutting back and not planning on growth since folk will soon not be able to pay bills/ keep utilities down, cut out entertainment, and stop thinking of themselves, think of consumers/ things will soon get worse/ |
| Date Filed | 3/4/2009 11:00:34 AM |

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900839 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | Fred |
| Middle Initial | N/A |
| Last Name | Armstrong |
| Street Address | Not Provided |
| Mailing Address | N/A |
| City | Lamonte |
| State | MO |
| County | Warren |
| Phone No. | 999-999-9999 Ext - |
| Email | N/A |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)See attached - customer opposed to increase - customer is elderly on a fixed income and feels that increase request is unjust/ customer also angry over increased bill this year in spite of high efficiency heat pump installation/ |
| Date Filed | 3/4/2009 11:06:56 AM |

From: FRED ARMSTRNG [mailto:doubleaa0@sbcglobal.net]
Sent: Wednesday, March 04, 2009 10:54 AM
To: PSC Info (Public Info Email Address) - PSC
Subject: KCP&L Rate Hike

As a senior citizen living on Social Security I believe that a rate hike is unjust.

I just had a hiefficiency heat pump installed this past summer to help lower my heating and cooling bills. I called KCP&L and ask if I qualified for a reduction in my electricity and they told me that I did and they would change my rate, but my elictricity is running about \$25.00 higher than last year. I would have been better off not contacting KCP&L at all.

And now KCP&L wants another rate hike. When do we say enough is enough.

May be the commission should look into the pay and bonus's KCP&L are handing out every year before considering a rate hike.

Times are tough and I for one do not believe KCP&L is trying to cut back on there spending like ordinary people are.

Fred Armstrong
La Monte MO.

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900843 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | Jean and Pat |
| Middle Initial | N/A |
| Last Name | Allen |
| Street Address | 21897 Swope Road |
| Mailing Address | N/A |
| City | Sedalia |
| State | MO |
| County | |
| Phone No. | 999-999-9999 Ext - |
| Email | allens2@wildblue.net |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)See attached - former Aquila - opposed to rate increase request/ feels company should cut their current expenses rather than get increase/ |
| Date Filed | 3/4/2009 11:56:28 AM |

Warren, Derl

From: PAT ALLEN [allens2@wildblue.net]
Sent: Wednesday, March 04, 2009 11:45 AM
To: PSC Info (Public Info Email Address) - PSC
Subject: Proposed rate increase for KCP&L

Hello !

We are a customer of KCP&L and are astounded by their request for a rate increase of 15% or more. We do not have many of the details they are using to justify this grossly excessive rate increase, but one that particularly disturbs us is a recent indication in the newspaper that this increase is completely based on expenditures that have already been made. If they proceeded on the basis that they would get such an increase, we strongly suggest that it be denied and force them to cut their current expenses, like most of the rest of the country is having to do, sufficiently to cover what they already have spent. We understand that many expenses are rising, but such a large rate increase is ridiculous if not immoral.

WE STRONGLY URGE YOU TO DENY OR SUBSTANTIALLY REDUCE THEIR REQUESTED RATE INCREASE.

Jean & Pat Allen
21897 Swope Rd.
Sedalia, Mo. 65301

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|---|
| Public Comment No. | P200900846 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | Norman |
| Middle Initial | N/A |
| Last Name | Greer |
| Street Address | 1517 NE Amanda Lane |
| Mailing Address | N/A |
| City | Lees Summit |
| State | MO |
| County | Jackson |
| Phone No. | 816-525-1780 Ext - |
| Email | N/A |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)Former Aquila - customer opposed - customer feels that KCPL will make people suffer in this economy and feels KCPL is not cutting where they can to keep costs low/ says it inhibits people who try to go efficient will pay because if usage goes down, price will go up/ don't want to pay for price overruns at lotan plant/ why should bad KCPL investment be on back of rate payers? |
| Date Filed | 3/4/2009 2:20:23 PM |

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900850 |
| Utility Type | Electric |
| Utility Company | KCP&L Greater Missouri Operations Company-Investor (Electric) |
| First Name | Colleen |
| Middle Initial | N/A |
| Last Name | Mazzella |
| Street Address | n/a |
| Mailing Address | N/A |
| City | Sedalia |
| State | MO |
| County | N/A |
| Phone No. | 660-826-4209 Ext - |
| Email | jecomazz@yahoo.com |
| Case No. | ER-2009-0090 |
| Public Comments Description | (cld) see attached |
| Date Filed | 3/5/2009 9:50:59 AM |

Dunham, Courtney

From: Jeff and Colleen Mazzella [jecomazz@yahoo.com]

Sent: Wednesday, March 04, 2009 7:18 PM

To: PSC Info (Public Info Email Address) - PSC

Subject: KCP&L Rate Hike

As I was unable to attend the hearing in Sedalia regarding the rate hike requested by KCP&L I wanted to be sure and be heard also. Although Sedalia is fairly new to KCP&L they are no different than any of the utility companies we have had. In these economic times especially a rate hike would be very trying on many customers, and it isn't like we have a choice of who we use for our utilities. The amount may sound meager, but when you add it to everything else that seems to be going up in price, average people just can't get by. Let alone get ahead.

Something I have noticed is a huge trend in the past several years - when summer is approaching the electric companies want a rate hike. After all, that is when we use the most electricity (for air conditioning, fans, etc.). Then when winter is approaching, the gas companies want a rate hike as that is when many of us use more gas for heating. Seems a bit convenient for them doesn't it?

Thank you,
Colleen Mazzella
Sedalia, MO
660-826-4209

3/5/2009

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900853 |
| Utility Type | Electric |
| Utility Company | KCP&L Greater Missouri Operations Company-Investor (Electric) |
| First Name | Russell |
| Middle Initial | L |
| Last Name | Terhune |
| Street Address | 201 Manor Dr |
| Mailing Address | N/A |
| City | Belton |
| State | MO |
| County | N/A |
| Phone No. | N/A |
| Email | N/A |
| Case No. | ER-2009-0090 |
| Public Comments Description | see attached |
| Date Filed | 3/5/2009 10:34:10 AM |

RECEIVED²

MISSOURI PUBLIC SERVICE COMMISSION
PO BOX 360
JEFFERSON CITY MO 65102

MAR 05 2009
*Records
Public Service Commission*

201 MANOR DR
BELTON MO 64012
MAR 1 2009

RE; RATE INCREASE KCP&L FORMERLY AQUILA INC

KCP&L ACQUIRED OUR FORMER ELECTRIC SUPPLIER NOW THEY ARE REQUESTING A RATE INCREASE OF 14% FOR US. I DO NOT THINK IT IS A JUSTIFIED INCREASE. LETS GO BACK TO AQUILA INC.

MISSOURI PUBLIC SERVICE OUR GAS SERVICE CO, JUST GAVE US A RATE DECREASE BECAUSE OF LOWER GAS PRICES.

KCP&L MUST NOT BE A VERY EFFICIENT PRODUCER OF ELECTRICITY. WHILE THEY ARE USING COAL, SOME WIND, NUCLEAR AND PROBABLY SOME GAS, I THINK THEY ARE NEEDING MONEY FOR THEIR NEW PLANTS. EXPANSION NOT ENERGY COSTS. THEY ACQUIRED AQUILA AND THEIR SOURCE OF ELECTRICITY. IF AQUILA COULD OPERATE AS A COMPANY AT SERVICE AND MAKE A LIVING, THEN WHY CAN'T KCP&L DO AS WELL.

PEOPLE MUST PAY FOR ELECTRICITY FOR HEAT, LIGHTS AND OTHER BASIC NEEDS. THE ONLY WAY YOU CAN SAVE ON ITS COSTS ARE BY KEEPING YOUR HOME TO COLD FOR COMFORT. LIKE FOOD IT'S A BASIC NEED, AND NOT SOMETHING FOR THEM TO MAKE A 14% PROFIT ON.

SOMEPLACE, SOMETIME, SOMEONE MUST SAY "NO" YOU ARE OUR ELECTED PEOPLE TO DO THAT FOR US.

DON'T MAKE US CUTOUT ANOTHER NEED OR DESIRE TO CONTINUE THERE INEFFICIENCY, MAKE THEN CUT CORNERS LIKE WE MUST DO.

ON A FIXED INCOME

Russell L. Terhune
RUSSELL L TERHUNE

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900860 |
| Utility Type | Electric |
| Utility Company | KCP&L Greater Missouri Operations Company-Investor (Electric) |
| First Name | Mary Ann |
| Middle Initial | N/A |
| Last Name | Holdeman |
| Street Address | n/a |
| Mailing Address | N/A |
| City | n/a |
| State | MO |
| County | N/A |
| Phone No. | N/A |
| Email | holde@hughes.net |
| Case No. | ER-2009-0090 |
| Public Comments Description | (cld) see attached |
| Date Filed | 3/6/2009 2:22:25 PM |

Dunham, Courtney

From: Mary Ann [holde@hughes.net]
Sent: Thursday, March 05, 2009 6:08 PM
To: Dunham, Courtney
Subject: Re: RE: KCPL rate increase

Yes, we were former Aquilla customers.

On Mar 5, 2009, courtney.dunham@psc.mo.gov wrote:

Dear Ms. Holdeman,

Thank you for contacting our office. This e-mail is to acknowledge receipt of your public comments. Your comments will be filed into the official case file of the Missouri Public Service Commission. As a part of the official case file, the Commission will be able to view all public comments for consideration. In order to get your comments into the correct case I need to know if you were a former Aquilla customer.

Thank you for taking the time to submit your comments for the record. If at any time you have questions or concerns regarding a regulated utility company, please feel free to contact our office at 1-800-392-4211.

Sincerely,

Consumer Services Department
Missouri Public Service Commission

From: Mary Ann [mailto:holde@hughes.net]
Sent: Wednesday, March 04, 2009 8:43 PM
To: PSC Info (Public Info Email Address) - PSC
Subject: Fwd: KCPL rate increase

Dear Commissioners,

We are finding that the rate increase requested by KCPL is ludicrous. People are having enough difficulty paying bills. We are certainly not getting an increase in our pensions as is no one else that we know. We are asked to conserve energy and when we do conserve we get rewarded with rate increase. Makes a lot of sense doesn't it? Maybe KCPL needs to look at it's

organization, waste. unnecessary expenses,
etc. before they ask for rate increase.

Thanks for listening,
Mary Ann Holdeman

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|---|
| Public Comment No. | P200900861 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company-Investor (Electric) |
| First Name | Ed |
| Middle Initial | N/A |
| Last Name | Sellers |
| Street Address | Not provided |
| Mailing Address | N/A |
| City | Not Provided |
| State | MO |
| County | |
| Phone No. | 999-999-9999 Ext - |
| Email | ed.sellers@worldnet.att.net |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)See attached - former Aquila - customer elderly on fixed income and opposes rate increase request for a variety of reasons. |
| Date Filed | 3/9/2009 8:44:55 AM |

Warren, Derl

From: Ed Sellers [ed.sellers@worldnet.att.net]
Sent: Sunday, March 08, 2009 1:39 PM
To: opcservice@ded.mo.gov; PSC Info (Public Info Email Address) - PSC
Subject: 17.5 % increased asked for KCP&L

March 8, 2009,

To Whom It May Concern:

We are especially disturbed by KCP&L Electric asking for a 17.5 per cent increase in their rates. This rate increase is exorbitant, especially in light of the hard economic times that exist. Do not the governments of Missouri, Cass and other counties, Kansas City, Belton and other communities, and all families in the affected areas have to live within their budgets??? Not only does this rate increase raise our usage bill, but it raises the taxes that are part of that bill which makes the total bill even higher.

It is bad enough that are current tax dollars are going to help bail out other corporations that have mismanaged their money, and CEO's who take big bonuses for doing failing work. We read in the papers where KCP&L was going to use part of the increase to buy Chief's and Royal's tickets and pay for trips to the Excelsior Springs Spa for meetings. Why should the folks who have to have this utility to survive be saddled with this ridiculous increase???

I am 70 and my wife is 65, and I'll tell you for sure that our pension will not increase by 17.5 per cent.

Utilities are a monopoly that must be controlled by your agencies. If you do not step up and control this ridicules increase request, you are not serving the people of Missouri that depend on you.

Please reject this increase request. No doubt, KCP&L needs more money to operate, don't we all. However, their increase should fall within the **COLAs** that exist for the rest of us in Missouri.

Hoping that you will abide by sane judgment and reject this request.

Thank you,

Georgie and Ed Sellers
Belton, Missouri

3/9/2009

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900862 |
| Utility Type | Electric |
| Utility Company | KCP&L Greater Missouri Operations Company-Investor (Electric) |
| First Name | Ronald |
| Middle Initial | N/A |
| Last Name | Doyon |
| Street Address | 1313 NE Timbercreek Way |
| Mailing Address | N/A |
| City | Lees Summit |
| State | MO |
| County | N/A |
| Phone No. | 816-246-8220 Ext - |
| Email | N/A |
| Case No. | ER-2009-0090 |
| Public Comments Description | (cld) see attached |
| Date Filed | 3/9/2009 9:12:02 AM |

Dunham, Courtney

From: Ronald Doyon [ronalddoyon@att.net]
Sent: Friday, March 06, 2009 5:21 PM
To: Dunham, Courtney
Subject: Re: rate increase

Mr Ronald P Doyon
1313 N E Timbercreek Way
Lee's Summit, Missouri 64086
Phone 816-246-8220

Ronald P Doyon 

From: "Dunham, Courtney" <courtney.dunham@psc.mo.gov>
To: Ronald Doyon <ronalddoyon@att.net>
Cc: "Poole-King, Contessa" <contessa.king@psc.mo.gov>; "Warren, Derl" <derl.warren@psc.mo.gov>
Sent: Friday, March 6, 2009 8:10:05 AM
Subject: RE: rate increase

Dear Mr. Doyon,

Thank you for contacting our office. I understand your concerns and would be happy to file your comments in the official case file of the Missouri Public Service Commission. As a part of the official case file, the Commission will be able to view all public comments for consideration. In order to do this I will need a little more information from you. Could you please provide your address, city & county, contact phone number, and also the name of the utility company you comments are in reference to.

If you have any questions please feel free to contact our office at (800) 392-4211.

Sincerely,

Consumer Services Specialist
Missouri Public Service Commission

From: Ronald Doyon [mailto:ronalddoyon@att.net]
Sent: Thursday, March 05, 2009 5:16 PM
To: PSC Info (Public Info Email Address) - PSC
Subject: rate increase

Please don't allow this type of rate increase. It is hard enough to make ends meet when you are retired. Buying food and medication is something we have to put out on the side

3/9/2009

burner. Well I believe government needs to step in and help the elderly. Please don't allow this to happen.

Ronald P Doyon 

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900863 |
| Utility Type | Electric |
| Utility Company | KCP&L Greater Missouri Operations Company-Investor (Electric) |
| First Name | Lorna |
| Middle Initial | N/A |
| Last Name | Poston |
| Street Address | 108 E Second Street |
| Mailing Address | N/A |
| City | Urich |
| State | MO |
| County | N/A |
| Phone No. | 913-829-0600 Ext - |
| Email | lgp92kc@yahoo.com |
| Case No. | ER-2009-0089 |
| Public Comments Description | (cld) see attached Public Comments forwarded by the Governor's Office. |
| Date Filed | 3/9/2009 9:46:29 AM |

Dunham, Courtney

From: Brown, Zoe [Zoe.Brown@mo.gov]
Sent: Monday, March 09, 2009 9:12 AM
To: Dunham, Courtney
Subject: Lorna Poston

Capitol Correspond
Incoming Email Message

Constituent ID: 5025

Lorna Poston
108 E. Second Street
Urich, MO 64788

Email: lgp92kc@yahoo.com

Phone(s): (H) (913)829-0600

Activity Created: 3/4/2009
File Location: 5565
Interest Code(s): UTILITY

Incoming Message:

RSP: Yes.

Date Received: 3/4/2009 2:31:35 PM
Topic/Subject Desc: Utilities
Dear Mr. Governor,

Last week, my electric company, KCP&L wanted a 17.5% tax increase to pay for employee tickets to World's of Fun, Kansas City Chiefs and KC Royals. When caught by a Consumer Watchdog group, they backed down.

Now they are wanting the same 17.5% increase or they "will be in financial ruin".

If they were so bad off financially, why did they acquire Aquila?

This is fraud...or it should be. I'm tired of bailouts to rich folks while the rest of us struggle to put food on the table.

And when I tried to switch electric companies, I was informed it is illegal to do so.

Please do not approve this measure. We are in a recession. The average person simply cannot afford any more.

Thank you

3/9/2009

Zoe Brown
Constituent Services
Office of the Governor
573.751.1353

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900865 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | Raphel |
| Middle Initial | N/A |
| Last Name | Lemons |
| Street Address | 800 Shadow Hill Road |
| Mailing Address | N/A |
| City | Clinton |
| State | MO |
| County | N/A |
| Phone No. | N/A |
| Email | N/A |
| Case No. | ER-2009-0089 |
| Public Comments Description | See Attached |
| Date Filed | 3/9/2009 12:52:11 PM |

March 5, 2009

RECEIVED³

MAR 9 2009

Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Records
Public Service Commission

Re: KCP&L Greater Missouri Operations Co.

This letter is to voice our dissent against KCP&L's request for a proposed increase to customers of approximately 14%.

~~I think this is unconscionable,~~ considering the drastic downturn in our economy. I'm pleading with you to intervene with a strong, NO.

We are elderly, our primary income is derived from Social Security. We certainly did not get this kind of a cost of living increase, plus our S.S. healthcare costs increased, as did our Medicare D by insurance companies. I, the wife, found it necessary to look for a new provider for Medicare D. as this insurance was going to almost double.

The grocery prices and all household commodities increased with the fuel pump gas prices, and have not reduced, since prices came down.

Many people do not jobs, as they've been laid off. For those, who do work and can are being asked to help the unemployed. This can really be a stretch with rising prices being asked by utility companies.

You could say it is tough on these companies who's CEO's and board member's make bad choices of take overs, such as Aquila who chose to build a plant in Cass Co., which later became inoperable do to disregard of regulations. Did KCPL executives think we can come back and request additional customer fees after the transition to cover these expenses?

I'm asking you to be reasonable with the consumers.

Sincerely,

Raphel A. Lemons

Mrs. Raphel A. Lemons

Mr. & Mrs. Raphel A. Lemons
800 Shadow Hill Road
Clinton, MO 64735



Raphael A. Lenons
800 Shadow Hill Dr.
Clinton, MO 64735-9165

KANSAS CITY 6

05 MAR 2009

Public Service
P.O. Box 360
Jefferson City

ES10240360

11/10/10/11/10

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900866 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | Mary |
| Middle Initial | J |
| Last Name | Proffitt |
| Street Address | 21357 E. Nobo Hill Rd. |
| Mailing Address | N/A |
| City | Nevada |
| State | MO |
| County | N/A |
| Phone No. | N/A |
| Email | N/A |
| Case No. | ER-2009-0089 |
| Public Comments Description | See Attached |
| Date Filed | 3/9/2009 12:55:00 PM |

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MAR 9 2009

Records
Public Service Commission

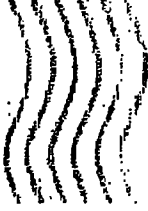
21357 E. Webb Hill Rd.
Nevada, Mo. 64772
March 4, 2009
Mo. Public Service Comm.

Kansas City Power & Light
request is way too much!!
They should never have
bought Aquila if they could
not provide reasonable
service without holding
us up!

Our Social Security only goes
up 2% or 3% — K.C. P+L
is way out of line requesting
12% increase for Nevada
area, and 17% for Kansas
City just to build up
reserves & make more
profit. If there was a moratorium
on any raises anywhere we'd
all manage very well!

Sincerely
Mrs. Mary J. Proffitt

Mary J. Drappin
213 S. E. 1st St. E.
Merida, Mo. 64772



KANSAS CITY 641-661

04 MAR 2009 PM 1 T

Mrs. Public Service Comm.
P.O. Box 360
Jefferson City, Mo. 65102

65102+0360



Missouri Public Service Commission**Public Comments**

Public Comment No. **P200900867**

Utility Type **Electric**

Utility Company **Kansas City Power &
Light Company-
Investor(Electric)**

First Name **Michael**

Middle Initial **N/A**

Last Name **Cormican**

Street Address **1401 E 15th St.**

Mailing Address **N/A**

City **Sedalia**

State **MO**

County **N/A**

Phone No. **N/A**

Email **N/A**

Case No. **ER-2009-0089**

Public Comments
Description **See Attached**

Date Filed **3/9/2009 12:59:51 PM**

To whom it may concern:

I want to make a comment about KCP&L raising the rates. They need to take responsibility for their problems of spending money they didn't have yet. They should not cause hardship on others because of their mistakes.

All large companies and organizations should learn to cut expenses and be willing to give up some things, like the rest of us have to do.

They should not raise the rates. They should encourage people to find ways of lowering their usage. People should be rewarded for being thrifty, not greedy.

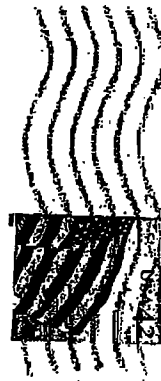
Thank you.

Joyce Cormican



Mr. Michael Cormican
1401 E 15th St.
Sedalia, MO 65301

MISSOURI POST
DEC 6554 1 T
05 MAR 2009 PM



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MAR 9 2009

Records
Public Service Commission

Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

6510210360



Missouri Public Service Commission**Public Comments**Public Comment No. **P200900870**Utility Type **Electric**Utility Company **Kansas City Power &
Light Company-
Investor(Electric)**First Name **Tom**Middle Initial **N/A**Last Name **Martin**Street Address **1409 Cedar Drive**Mailing Address **N/A**City **Sedalia**State **MO**County **Pettis**Phone No. **660-281-7094 Ext -**Email **tomrmartin@charter.net**Case No. **N/A**

Public Comments
Description **I think that the attempt by KCP&L to garner a huge rate increase at a time when the economy's so bad, is morally and ethically wrong. A modest increase of 2 to 3% would be understandable, but over 17% is ludicrous. The utility cos. have been making tremendous profits based on the misguided attempt of our Govt. to deregulate this industry. It's not like we, as consumers have a choice of service providers. Marketplace competition on the wholesale side translates into price gouging at my expense.**

Date Filed **3/9/2009 2:06:07 PM**

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900871 |
| Utility Type | Electric |
| Utility Company | KCP&L Greater Missouri Operations Company- Investor(Electric) |
| First Name | Lawrence |
| Middle Initial | A |
| Last Name | Bradshaw |
| Street Address | 13013 SE Howard Road |
| Mailing Address | N/A |
| City | Greenwood |
| State | MO |
| County | |
| Phone No. | N/A |
| Email | litho.man@sbcglobal.net |
| Case No. | ER-2009-0090 |
| Public Comments Description | (cld) see attached |
| Date Filed | 3/9/2009 2:46:09 PM |

Dunham, Courtney

From: Larry Bradshaw [litho.man@sbcglobal.net]
Sent: Monday, March 09, 2009 11:17 AM
To: PSC Info (Public Info Email Address) - PSC
Subject: KCP&L Rate Increase

March 8, 2009

Dear members of the Missouri Public Service Commission,

The request by KCP&L to raise rates for its customers seems to me to be in-twined with politics and deception. The increase amounts to double increases in a shot period because Aquila, the company they bought recently also had a rate increase just a short time ago.

The recent article in the Kansas City Star seems to indicate they are using the current economic crises as an reason for the increases, when only weeks prior KCP&L told us their increase had nothing to do with the economy. Of course, that was when they were told the increase would be difficult for many households caught in the crisis. Now, they want to say that they are the victims of the crisis and the rate increase does have something to do with the economy. Which is really greater, the crisis for the customer or the crisis company?

In addition to the "economy" issue, it seems on the surface that KCP&L wants Missouri to make up for what Kansas called impudent cost they do not wish to fund. Are you also finding impudent cost and responding to them?

Please research in depth and keep the KCP&L customers in the forefront. My wife and I are living on our retirement income and like many who live in unincorporated areas of Jackson County, have homes that are all electric and have seen our rates increase more rapidly than our income.

Thank you for your consideration.

Sincerely,

Lawrence A. Bradshaw
13013 SE Howard Road
Greenwood, MO 64034

litho.man@sbcglobal.net <<mailto:litho.man@sbcglobal.net>>

3/9/2009

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900884 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | Robert |
| Middle Initial | N/A |
| Last Name | McCoy |
| Street Address | 1613 N Washington |
| Mailing Address | N/A |
| City | Nevada |
| State | MO |
| County | Vernon |
| Phone No. | N/A |
| Email | N/A |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)Customer opposed - including wife of caller - customer feels that the Aquila merger raise in rates should stay with no increase/ feels that escalating costs are out of control and people must make a stand/ feels KCPL should set a precedent and drop the rate increase as an example to all utilities/ all costs are connected and all expenses affect everyone in increased cost for health care, food, etc/ hurts folk on fixed income/ feels PSC should ban the electrical unions and give cuts to KCPL |
| Date Filed | 3/13/2009 10:39:35 AM |

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900894 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | Laura |
| Middle Initial | N/A |
| Last Name | Poston |
| Street Address | Not Provided |
| Mailing Address | N/A |
| City | Not Provided |
| State | MO |
| County | |
| Phone No. | 913-829-0600 Ext - |
| Email | lgp92kc@hotmail.com |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)See attached - customer is opposed to rate increase - |
| Date Filed | 3/17/2009 11:35:53 AM |



ATTORNEY GENERAL OF MISSOURI
JEFFERSON CITY
65102

CHRIS KOSTER
ATTORNEY GENERAL

RECEIVED

MAR 18 2009

*Records
Public Service Commission*

P.O. Box 899
(573) 751-3321

March 16, 2009

Ms. Lorna G Poston
108 E. Second St.
Urish, MO 64788

RE: Complaint No. CF-2009-06334 KCP&L

Dear Ms. Poston:

Thank you for contacting The Missouri Attorney General's Consumer Complaint Unit. I reviewed your complaint carefully and determined that it does not generally fall within the scope of matters handled by the Complaint Unit.

I have forwarded your complaint to the Public Service Commission, 200 Madison, P.O. Box 360, Jefferson City, Missouri 65102.

Should you require assistance in the future, please contact the Consumer Protection Hotline at 1-800-392-8222 or visit our web site at www.ago.mo.gov.

Sincerely,

CHRIS KOSTER
Attorney General

Karen E. Wilson

Karen E. Wilson
Investigator
Consumer Protection Division

Consumer Complaint Form



RETURN TO: Attorney General's Office
Consumer Protection Unit, PO Box 899
Jefferson City, MO 65102

Missouri Attorney General
Chris Koster

Phone: 800-392-8222
Web: www.ago.mo.gov

| CONSUMER INFORMATION | | COMPANY INFORMATION | |
|----------------------|-------------------------------------|---------------------|----------------------|
| NAME | Ms. Lorna G Poston | NAME | KCP&L |
| ADDRESS | 108 E. Second St. Urich MO 64788 | CONTACT ADDRESS | |
| COUNTY | Henry | COUNTY | Kansas City MO 64141 |
| HOME PHONE | 816-419-6336 | PHONE | 816-556-2200 |
| WORK PHONE | 913-829-0600 | WEBSITE | |
| E-MAIL | lgp92kc@yahoo.com | E-MAIL | |

| TRANSACTION INFORMATION | | |
|---|--------------------|----------------------|
| DATE OF TRANSACTION/PURCHASE | AMOUNT PAID \$0.00 | PAYMENT METHOD Check |
| HOW AND WHERE DID YOU LEARN ABOUT PRODUCT OR SERVICE? subscriber | | |
| DID YOU SIGN A CONTRACT, WARRANTY AGREEMENT OR SIMILAR PAPERS? No | | |
| BRIEFLY EXPLAIN YOUR COMPLAINT KCP&L (an electric service provider) increased electric rates by 17.5%. A consumer watchdog group in Kansas found that many parts of the proposal included expenses for employee tickets to Worlds of Fun, Kansas City Chiefs and Royals games. KCP&L claimed these were legitimate expenses. Why is this not illegal? Customers should not have to pay these extra expenses. I want my money back. I want action taken against this company. | | |
| WHAT ACTION HAVE YOU TAKEN TO RESOLVE THIS COMPLAINT? contacting the attorney general of MO | | |
| HOW DO YOU WANT THIS COMPLAINT RESOLVED? Refund - | | |
| HAVE YOU BEEN SUED OR FILED A LAWSUIT ABOUT THIS COMPLAINT? No | | |
| NAME OF ANY AGENCY CONTACTED | | |

Ms. Lorna G Poston

CF-2009-06334

Warren, Derl

From: Lorna Poston [lgp92kc@hotmail.com]
Sent: Tuesday, March 17, 2009 10:05 AM
To: Warren, Derl
Subject: RE: KCP&L

Derl, Thank you for contacting me.

I live in Henry county, MO.

I would rather not give my address via email. but would be happy to provide that over the phone should someone call me.

Work phone is 913-829-0600 (best number to reach me)

I am a former Aquila customer. Before Aquila I was with a nice company called Missouri Public Service. I wish that was still the case.

Lorna =^..^=

For every 1 cat or dog in a loving home, 7 others are not so lucky. Pet over-population is not the end of the world unless you are a dog or a cat. Please spay/neuter....it really is a matter of life and death.

In the U.S.A., every minute of every day 10 pets are killed. Why? Because they are homeless.

From: derl.warren@psc.mo.gov
To: lgp92kc@hotmail.com
CC: courtney.dunham@psc.mo.gov; contessa.king@psc.mo.gov
Date: Tue, 17 Mar 2009 09:52:23 -0500
Subject: RE: KCP&L

Dear Ms. Poston:

Thank you for contacting our office. I understand your concerns and would be happy to file your comments in the official case file of the Missouri Public Service Commission. As a part of the official case file, the Commission will be able to view all public comments for consideration. In order to do this I will need a little more information from you. Could you please provide your address, city & county, and a contact phone number? To get your complaint into the correct case I will also need to know if you were a former Aquila customer.

If you have any questions please feel free to contact our office at (800) 392-4211.

Sincerely,

Consumer Services Specialist

3/17/2009

From: Lorna Poston [mailto:lgp92kc@hotmail.com]
Sent: Tuesday, March 17, 2009 9:40 AM
To: PSC Info (Public Info Email Address) - PSC
Subject: KCP&L

Hello. There was an article on KMBC dated 10-19-07 pleading with Missouri Public Service to reject the sale of Aquila to KCP&L stating concerns over rate increases.

Well, the sale went through and here comes a 17.5% rate increase.

Do you have any idea how much that kind of an increase will hurt the average American family that is already struggling to put food on the table and pay the mortgage?

KCP&L spent our money to send employees to World's of Fun, the Chiefs and Royals games and now they claim financial trouble and want customers to bail them out. Why should they be allowed a bail out? They were as careless with the money they received as AIG was. Big, fancy, rich people need to learn how to manage their money better and stop expecting the struggling working class to get them out of a financial jam.

Who is going to bail us out when we are taxed so much and rates increase so much that we can no longer afford basic necessities?

Shame, shame on KCP&L and shame on Missouri Public Service Commission if you allow the rate increase to take place.

Lorna =^..^=

For every 1 cat or dog in a loving home, 7 others are not so lucky. Pet over-population is not the end of the world unless you are a dog or a cat. Please spay/neuter....it really is a matter of life and death.

In the U.S.A., every minute of every day 10 pets are killed. Why? Because they are homeless.

Windows Live™ Groups: Create an online spot for your favorite groups to meet. [Check it out.](#)

Express your personality in color! Preview and select themes for Hotmail®. [See how.](#)

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900896 |
| Utility Type | Electric |
| Utility Company | Kansas City Power & Light Company- Investor(Electric) |
| First Name | Tom |
| Middle Initial | N/A |
| Last Name | Cunningham |
| Street Address | 2507 Greenwood Lane |
| Mailing Address | N/A |
| City | Sedalia |
| State | MO |
| County | |
| Phone No. | 660-827-3782 Ext - |
| Email | tctennis@sbcglobal.net |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)See attached - customer is all - electric former Aquila customer opposed to rate increase. |
| Date Filed | 3/18/2009 12:06:13 PM |

Warren, Derl

From: Cunningham(Tom,Dyana & Megan) [tctennis@sbcglobal.net]
Sent: Wednesday, March 18, 2009 11:57 AM
To: Warren, Derl
Subject: Re: Increase in Electric Bill

KCP&L, 2507 Greenwood Lane, Sedalia, MO. 65301, Pettus, 660 827-3782. This my second response with this information, should i call the 800#

From: "Warren, Derl" <derl.warren@psc.mo.gov>
To: "Cunningham(Tom,Dyana & Megan)" <tctennis@sbcglobal.net>
Sent: Tuesday, March 17, 2009 9:04:23 AM
Subject: RE: Increase in Electric Bill

Dear Sir or Madam:

This is the second request for additional information concerning which Gas or Electric, or both, utility you would like to comment or complain on. Please respond with the name of the utility(s), your address, county of residence, and phone number. If a response is not recieved by Wednesday March 18, 2009, we will assume that any issues you may have had with your Gas or Electric utilities has been resolved.

Thank you.

Sincerely,

PSC Consumer Services
Phone: 1-800-392-4211
Email: derl.warren@psc.mo.gov

From: Cunningham(Tom,Dyana & Megan) [mailto:tctennis@sbcglobal.net]
Sent: Saturday, March 07, 2009 4:24 PM
To: opcservice@ded.mo.gov; PSC Info (Public Info Email Address) - PSC
Subject: Increase in Electric Bill

We don't have Gas for a reason. We shouldn't be punished for making the right decisions. Raise Gas prices to make up for the higher cost of gas and electricity for higher electrical cost. Whats the point in paying other countries for what we can use here. If government would work in our interest instead of their pockett we'd all be ahead.

3/18/2009

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200900903 |
| Utility Type | Electric |
| Utility Company | KCP&L Greater Missouri Operations Company- Investor(Electric) |
| First Name | David |
| Middle Initial | E |
| Last Name | Wewers |
| Street Address | 5118 SW Sandpiper Dr. |
| Mailing Address | N/A |
| City | Lees Summit |
| State | MO |
| County | N/A |
| Phone No. | N/A |
| Email | davidwewers@comcast.net |
| Case No. | ER-2009-0090 |
| Public Comments Description | (cld) see attached |
| Date Filed | 3/23/2009 9:54:09 AM |

Dunham, Courtney

From: David Wewers [davidwewers@comcast.net]
Sent: Saturday, March 21, 2009 9:34 AM
To: PSC Info (Public Info Email Address) - PSC
Subject: KCPL rate increase request

I am writing you today to let you know my opposition to KCPL's proposed rate increase. I don't feel there is justification for that type of increase, let alone in this difficult economic time.

I also don't like the fact that KCPL uses money collected from customer rates to fund sponsorship for the Power and Light District.

An increase is inappropriate at this time.

David E. Wewers
5118 SW Sandpiper Dr.
Lee's Summit, MO 64082

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200901107 |
| Utility Type | Electric |
| Utility Company | KCP&L Greater Missouri Operations Company*-(Electric) |
| First Name | Wayne |
| Middle Initial | R |
| Last Name | Organ |
| Street Address | 1966 NW 415 Road |
| Mailing Address | N/A |
| City | Kingsville |
| State | MO |
| County | Johnson |
| Phone No. | 816-697-3397 Ext - |
| Email | woko@wildblue.net |
| Case No. | N/A |
| Public Comments Description | I do protest the rate increase proposed by KCP&L. If the rates were are so low as to require an increase in these depressed times West Star should not have been allowed to acquire the assets of Aquila. The citizens of this area DO NOT need nor CAN NOT stand a 16% rate hike in the middle of a deep rescission. We should not be expected to absorb management's ineptitude of acquiring more than they can manage and then counting on some one else to pay the tab. |
| Date Filed | 4/23/2009 8:57:25 AM |

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200901120 |
| Utility Type | Electric |
| Utility Company | KCP&L Greater Missouri Operations Company- Investor(Electric) |
| First Name | Joyce |
| Middle Initial | N/A |
| Last Name | Broughman |
| Street Address | 1412 SW Antiquity Drive |
| Mailing Address | N/A |
| City | Lees Summit |
| State | MO |
| County | |
| Phone No. | 816-600-6210 Ext - |
| Email | jbroughman999@msn.com |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)Former Aquila customer comment against KCPL rate increase/ says she does her part to be efficient and save money and KCPL should be required to do the same. |
| Date Filed | 5/1/2009 8:07:33 AM |

Warren, Derl

From: Carafeno, Dawn
Sent: Thursday, April 30, 2009 4:56 PM
To: Consumer Services
Subject: FW: KCP&L rate increase

This email was received by GCO; I believe it was meant for you.

Dawn M. Carafeno
Office of General Counsel
Missouri Public Service Commission
200 Madison Street
Jefferson City, Missouri 65101
573-751-7499

From: Joyce Broughman [mailto:jbroughman999@msn.com]
Sent: Thursday, April 30, 2009 4:36 PM
To: mopco@ded.mo.gov; GCO Internet Service
Subject: KCP&L rate increase

I am concerned about the size of the increase requested by KCP&L. I am a retired senior citizen, living on a fixed income. In 2003, I purchased a poured concrete house that had an energy star rating because I was interested in keeping my living costs as low as possible.

All of my appliances are energy star rated. I only burn lights in the room I am in. Sometimes during the winter when the evenings are long, if I am not reading, I burn a candle.

I keep my heat at 68 duriing the day and 64 when I go to bed night. I run my air conditioner at 78-80 and higher than that if the outside temperature is above 95.

I wash most of my clothes in cold water. I keep the water heater temperature at 120 degrees and it is in energy smart mode. I only run the dishwasher when it is full and then I never use heated drying.

My energy expense is as follows:

2006 - \$757
2007 - \$799
2008 - \$919

I have to watch my spending very carefully. I believe that KCP&L should look for ways to economize as well. I read about the amount of increase in executive benefits. Their requested increase is way above any increases in retirees' incomes.

Thank you for consideration of this and any assistance you may be able to provide.

Joyce Broughman
1412 SW Antiquity Drive
Lees Summit, MO 64081
816-600-6210

5/1/2009

Rediscover Hotmail®: Now available on your iPhone or BlackBerry [Check it out.](#)

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200901121 |
| Utility Type | Electric |
| Utility Company | KCP&L Greater Missouri Operations Company-Investor (Electric) |
| First Name | Joyce |
| Middle Initial | N/A |
| Last Name | Cook |
| Street Address | 1404 SW Antiquity Drive |
| Mailing Address | N/A |
| City | Lees Summit |
| State | MO |
| County | |
| Phone No. | 816-999-9999 Ext - |
| Email | scook34@kc.rr.com |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)See attached - customer opposed to rate increase in this economy and says KCPL is corrupt. |
| Date Filed | 5/1/2009 8:31:57 AM |

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200901139 |
| Utility Type | Electric |
| Utility Company | KCP&L Greater Missouri Operations Company-Investor (Electric) |
| First Name | Perry |
| Middle Initial | N/A |
| Last Name | Rice |
| Street Address | 887 Hargrove Road |
| Mailing Address | N/A |
| City | Peculiar |
| State | MO |
| County | |
| Phone No. | 816-590-2674 Ext - |
| Email | N/A |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)See attached - customer not in favor of increase/ feels it is corporate greed. |
| Date Filed | 5/13/2009 7:57:26 AM |

Warren, Derl

From: efis.messenger@psc.mo.gov
Sent: Tuesday, May 12, 2009 10:18 PM
To: Consumer Services
Subject: Public Service Commission - Complaint Form

****** Please do not reply to EFIS Messenger. Replies to this computer generated e-mail are routed to an unmonitored mailbox. ******

Date Received: 5/12/2009 10:17:31 PM
First Name: perry
Last Name: rice
Business Name:
Address: 887 harrgrove rd
City: peculiar
State: mo
Zip Code: 64078
County: cass county
Telephone Number Where You Can Be Reached During the Day:
Business (Work) Area Code () Number
Home Area Code (816) Number 590-2674
Other Area Code () Number
Email Address:
The Name of the Utility Company involved with your complaint: Kansas city power and light
Account Number:
Description: I am apposing the rate increase for KCP&L too many people are losing jobs and having a hard enough time supporting their family's There is too much corporate greed going on in America these days. When kcpl merged with Aquila the promised low electric prices they are not keeping their promises.

5/13/2009

Missouri Public Service Commission**Public Comments**

| | |
|--------------------------------|--|
| Public Comment No. | P200901165 |
| Utility Type | Electric |
| Utility Company | KCP&L Greater Missouri Operations Company- Investor(Electric) |
| First Name | Phillip |
| Middle Initial | N/A |
| Last Name | Trotter |
| Street Address | 609 W Stonecrest Circle |
| Mailing Address | N/A |
| City | St. Joseph |
| State | MO |
| County | Buchanan |
| Phone No. | 816-244-8534 Ext - |
| Email | lyzyrd@ponyexpress.net |
| Case No. | ER-2009-0090 |
| Public Comments Description | (ddw)See attached - customer comment attached contains comments on both MGE and KCPL/ |
| Date Filed | 6/3/2009 11:19:58 AM |

ATTACHMENT 4

The Staff of the Missouri Public Service Commission vs. KCP&L Greater Missouri Operations Company and Kansas City Power and Light Company

Case No. EC-2009-0430

Data Request No. 005:

Has the Commission received any informal complaints, as provided for in 4 CSR 240-2.070(2), alleging that KCP&L Greater Missouri Operations Company has inappropriately used the "KCP&L" brand? If so, please provide a copy of the complaint.

Answer:

No.

Signature:


Gay Fred

The Staff of the Missouri Public Service Commission vs. KCP&L Greater Missouri Operations Company and Kansas City Power and Light Company

Case No. EC-2009-0430

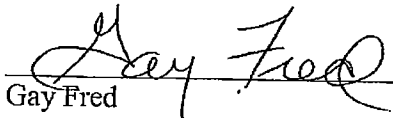
Data Request No. 006:

Has the Commission received any formal complaints, as provided for in 4 CSR 240-2.070(3), alleging that KCP&L Greater Missouri Operations Company has inappropriately used the "KCP&L" brand? If so, please provide a copy of the complaint.

Answer:

No.

Signature:


Gay Fred

ATTACHMENT 5

The Staff of the Missouri Public Service Commission vs. KCP&L Greater Missouri Operations Company and Kansas City Power and Light Company

Case No. EC-2009-0430

Data Request No. 011:

Did Staff file a complaint against Aquila, Inc. for its common use of the "Aquila" brand to communicate with and bill customers taking service under the rate schedules of "Aquila, Inc., dba Aquila Networks – For Territory Served by Aquila Networks – MPS" and "Aquila, Inc., dba Aquila Networks – For Territory Served by Aquila Networks – L&P"? If yes, please provide a copy of the complaint. If no, please explain why.

Answer:

Notwithstanding Staff's objection; No. While Staff does not know what Respondents mean by the term "Aquila brand", Staff states that it is not aware of any instances, prior to its acquisition by GPE, of Aquila, Inc. operating under an unauthorized or unregistered name.

Signature: Kevin A. Thompson By SD
Kevin A. Thompson

ATTACHMENT 6

The Staff of the Missouri Public Service Commission vs. KCP&L Greater Missouri Operations Company and Kansas City Power and Light Company

Case No. EC-2009-0430

Data Request No. 014:

Prior to this case, has Staff filed a complaint against Kansas City Power & Light Company for its use of the "KCP&L" brand to communicate with and bill customers taking service under the rate schedules of "Kansas City Power & Light Company" without prior Commission authorization to do so and without registering "KCP&L" as a fictitious name with the Missouri Secretary of State? If yes, please provide a copy of the complaint. If no, please explain why.

Answer:

Notwithstanding Staff's objection; No. Staff states that prior to the instances set forth in its Complaint, Staff was not aware that Respondent operated under an unauthorized or unregistered name. If this Data Request constitutes an admission of such behavior, Staff will amend its Complaint to so reflect.

Signature: Kevin A. Thompson By SD
Kevin A. Thompson

ATTACHMENT 7



State of Missouri

Judith K. Moriarty, Secretary of State

No. X 258652

Corporation Division

Registration of Fictitious Name

This information is for the use of the public and gives no protection to the name. There is no provision in this Chapter to keep another company or corporation from adopting and using the same name. (RSMo 417)

We, the undersigned, are doing business under the following name, and at the following address:

Name to be registered: MISSOURI GAS ENERGY

Missouri Business Address (if not, other): 504 Lavaca, Suite 900

City, State and Zip Code: Austin, Texas 78701

FILED

AUG 05 1993

Judith K. Moriarty
SECRETARY OF STATE

The parties having an interest in the business, and the percentage they own are (if a corporation is owner, indicate corporation name and percentage owned). If all parties are jointly and severally liable, percentage of ownership need not be listed:

| Name of Owners, Individual or Corporate | Street and Number | City | State | If listed, Percentage of ownership must equal 100% |
|---|------------------------------|---------------|--------------|--|
| <u>SOUTHERN UNION COMPANY</u> | <u>504 Lavaca, Suite 900</u> | <u>Austin</u> | <u>Texas</u> | <u>100 %</u> |
| _____ | _____ | _____ | _____ | _____% |
| _____ | _____ | _____ | _____ | _____% |
| _____ | _____ | _____ | _____ | _____% |
| _____ | _____ | _____ | _____ | _____% |
| _____ | _____ | _____ | _____ | _____% |

Make check for \$2.00 payable to the State Director of Revenue.

TO BE FILED IN DUPLICATE (Must be typed or printed)

Return to: Secretary of State
Corporation Division
P.O. Box 778
Jefferson City, Mo. 65102

The undersigned, being all the parties owning interest in the above company, being duly sworn, upon their oaths each did say that the statements and matters set forth herein are true.

Individual
Owners
Sign Here

| | | | | |
|---|---|-------|---|-------|
| { | X | _____ | X | _____ |
| | X | _____ | X | _____ |
| | X | _____ | X | _____ |

The undersigned corporation has caused this application to be executed in its name by its President or Vice-President and its Secretary or Assistant Secretary, this 4th

day of August, 19 93

X 258652

If
Corporation
is
Owner
Corporate
Officers
Execute
Here



SOUTHERN UNION COMPANY, a Delaware corporation

(Exact Corporate Title)

By Eugene A. Dubay
Its President or Vice-President

By Kerry Walker
Its Secretary or Assistant Secretary

(Corporate Seal)
If no seal, state "none".

The Secretary of State's Office makes every effort to provide program accessibility to all citizens without regard to disability. If you desire this publication in alternate form because of a disability, please contact the Director of Publications, P.O. Box 778, Jefferson City, Mo. 65102; phone (314) 751-1814. Hearing-impaired citizens may contact the Director by phone through Missouri Relay (800-735-2966). The Corporations Division also maintains a Telecommunications Device for the Deaf (TDD) at (314) 526-5599.

State of TEXAS

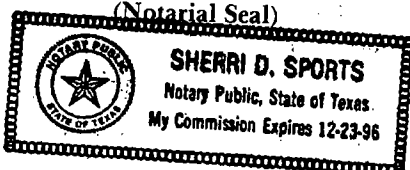
County of TRAVIS

SS

I, Sherri D. Sports, A Notary Public, do hereby certify that on the 4th
day of August, 19 93, personally appeared before me Eugene A. Dubay,
and being first duly sworn by me, acknowledged that _____ he signed as his own free act and deed the foregoing
document in the capacity therein set forth and declared that the statements therein contained are true.

IN WITNESS WHEREOF, I have hereunto set my hand and seal the day and year before written.

(Notarial Seal)



Sherri D. Sports
Notary Public

My commission expires

12-23-96

ATTACHMENT 8



State of Missouri

Robin Carnahan, Secretary of State

Corporations Division
P.O. Box 778 / 600 W. Main Street, Rm 322
Jefferson City, MO 65102

File Number:

X00930752

Date Filed: 11/13/2008

Expiration Date: 11/13/2013

Robin Carnahan

Secretary of State

Registration of Fictitious Name

(Submit with filing fee of \$7)
(Must be typed or printed)

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. The fictitious name registration expires 5 years from the filing date. (Chapter 417, RSMo)

The undersigned is doing business under the following name, and at the following address:

Business name to be registered: AT&T Advanced Solutions

Business Address: One AT&T Way

(P.O. Box may only be used in addition to a physical street address)

City, State and Zip Code: Bedminster, NJ 07921

The parties having an interest in the business, and the percentage they own are (If a business entity is owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed.):

Name of Owners,
Individual or
Business Entity

Street and Number
One AT&T Way

City and State
Bedminster, NJ

Zip Code
07921

If listed,
Percentage of
ownership
must equal
100%
100%

In Affirmation thereof, the facts stated above are true and correct:

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.060 RSMo)

[Signature]
Authorized Signature

Ryan N. Kenigsberg

October 27, 2008

Attorney-in-Fact

Wayne A. Wirtz, Secretary

October 27, 2008

[Signature]
Authorized Signature

Printed Name

Date

Authorized Signature

Printed Name

Date

Name and address to return filed document:

Name: _____

Address: _____

City, State, and Zip Code: _____

State of Missouri
Fictitious Creation 2 Page(s)



T0831816706

POWER OF ATTORNEY

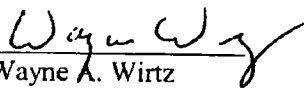
NOTICE IS HEREBY GIVEN THAT AT&T Corp. ("Corporation"), a corporation incorporated under the laws of New York does hereby appoint Ryan Kenigsberg as attorney-in-fact, and also Tim Light as attorney-in-fact for the Corporation to act for the Corporation and in the Corporation's name for the limited purposes authorized herein.

The Corporation, having taken all necessary steps to authorize the changes, hereby grants its attorney-in-fact the power to execute the documents necessary to file or to cancel assumed names, trade names and documents of similar import, in any state, county, circuit court or local jurisdiction.

This Power of Attorney expires when revoked by the Corporation.

IN WITNESS WHEREOF the undersigned has executed this Power of Attorney on this 1st day of October, 2008.

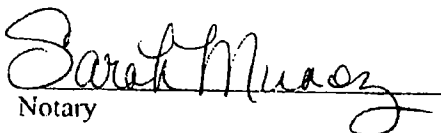
AT&T Corp.

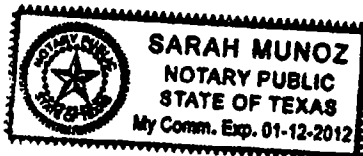

Wayne A. Wirtz
Secretary

State of TEXAS
County of BEXAR

On October 1, 2008, before me, the undersigned, a Notary Public in and for said State, personally appeared Wayne A. Wirtz, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me he executed the same in his authorized capacity, and that by his signature on the instrument the entity upon behalf of which the person acted, executed this instrument.

Witness my hand and official seal.


Notary





State of Missouri

Robin Carnahan, Secretary of State

Corporations Division
P.O. Box 778 / 600 W. Main Street, Rm 322
Jefferson City, MO 65102

File Number: 200701111606

X00788437

Date Filed: 01/09/2007

Expiration Date: 01/09/2012

Robin Carnahan
Secretary of State

Registration of Fictitious Name

(Submit with filing fee of \$7)
(Must be typed or printed)

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. The fictitious name registration expires 5 years from the filing date. (Chapter 417, RSMo)

The undersigned is doing business under the following name, and at the following address:

Business name to be registered: AT&T Communication Systems Southeast

Business Address: 1936 Blue Hills Drive, NE

(P.O. Box may only be used in addition to a physical street address)

City, State and Zip Code: Roanoke VA 24012

The parties having an interest in the business, and the percentage they own are (If a business entity is owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed.):

| Name of Owners, Individual or Business Entity | Street and Number | City and State | Zip Code | If listed, Percentage of ownership must equal |
|---|---------------------------|----------------|----------|--|
| BellSouth Communication Systems, LLC | 1936 Blue Hills Drive, NE | Roanoke VA | 24012 | 100% |
| | | | | 100% |
| | | | | |
| | | | | |

In Affirmation thereof, the facts stated above are true and correct :

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.060 RSMo)

Rebecca Brooks

Authorized Signature

Rebecca Brooks

Printed Name

10/9/06

Date

Authorized Signature

Printed Name

Date

Authorized Signature

Printed Name

Date

Name and address to return filed document:

Name: _____

Address: _____

City, State, and Zip Code: _____

State of Missouri
Fictitious Creation 1 Page(s)



T0700906602



State of Missouri
Robin Carnahan, Secretary of State

Corporations Division
P.O. Box 778 / 600 W. Main Street, Rm 322
Jefferson City, MO 65102

File Number: 200532522412
X00698921
Date Filed: 11/21/2005
Expiration Date: 11/21/2010
Robin Carnahan
Secretary of State

Registration of Fictitious Name

(Submit with filing fee of \$7)
(Must be typed or printed)

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. The fictitious name registration expires 5 years from the filing date. (Chapter 417, RSMo)

The undersigned is doing business under the following name, and at the following address:

Business name to be registered: AT&T Internet Services

Business Address: 2623 Camino Ramon

(P.O. Box may only be used in addition to a physical street address)

City, State and Zip Code: San Ramon, CA 94583-9130

The parties having an interest in the business, and the percentage they own are (If a business entity is owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed.):

Name of Owners,
Individual or
Business Entity

Street and Number
SBC Internet Services, Inc. 2623 Camino Ramon

City and State Zip Code
San Ramon, CA 94583-9130

If listed,
Percentage of
ownership
must equal
100%
100%

In Affirmation thereof, the facts stated above are true and correct :

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.060 RSMo)

Nathan Barth

11-18-2005

Authorized Signature

Printed Name

Date

Authorized Signature

Printed Name

Date

Authorized Signature

Printed Name

Date

Name and address to return filed document:

Name: _____
Address: _____
City, State, and Zip Code: _____

State of Missouri
Fictitious Creation 1 Page(s)



T0532516705



State of Missouri
Matt Blunt, Secretary of State

No. X **405483**

Corporations Division

Registration of Fictitious Name

(Submit in duplicate with filing fee of \$7)

(Must be typed or printed)

10793736
7-9

This information is for the use of the public and gives no protection to the name. There is no provision in this Chapter to keep another person or business from adopting and using the same name. (Chapter 417, RSMo.)

We, the undersigned, are doing business under the following name, and at the following address:

Business name to be registered: AT&T Local Network Services

Business Address: One Teleport Dr.

(P.O. Box alone not acceptable)

City, State and Zip Code: Staten Island, NY 10311

The parties having an interest in the business, and the percentage they own are (if a business entity is owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed):

| Name of Owners, Individual or Business Entity | Street and Number | City | State and Zip Code | If listed, Percentage of ownership must equal 100% |
|---|-------------------|---------------|--------------------------|--|
| TCG Kansas City, Inc. | One Teleport Dr. | Staten Island | NY 10311 | |
| TCG St. Louis, Inc. | One Teleport Dr. | Staten Island | NY 10311 | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

Return to: Secretary of State
Corporations Division
P.O. Box 778
Jefferson City, Mo. 65102

(Over)

FILED

MAR 06 2002

Matt Blunt
SECRETARY OF STATE

The undersigned, being all the parties owning interest in the above company, being duly sworn, upon their oaths each did say that the statements and matters set forth herein are true.

Individual
Owners
Sign Here

}

X _____ X _____
X _____ X _____
X _____ X _____

405483

If
Business Entity
Is
Owner,
Authorized
Person
Execute
Here

}

TCG Kansas City, Inc., TCG St. Louis, Inc.

Business Name

Antoinette A. Duah

Authorized Signature

ANTOINETTE A. DUAH, ASST. SECRETARY

Printed Name

Title

State of ~~Missouri~~

New Jersey

County of

Morris

ss

I, Patricia J. Fales, A Notary Public, do hereby certify that on Feb. 25, 2002
month/day/year

personally appeared before me ANTOINETTE A. DUAH, and being duly sworn by me, acknowledged that
he/she signed as his/her own free act and deed the foregoing document in the capacity therein set forth and declared that the statements
therein contained are true.

IN WITNESS WHEREOF, I have hereunto set my hand and seal the day and year before written.

(Notarial Seal or Stamp)

Patricia J. Fales
Notary Public

My commission expires 03-07-2006

My County of Commission Morris

Corp. #56 (11/00)



State of Missouri

Robin Carnahan, Secretary of State

Corporations Division
P.O. Box 778 / 600 W. Main Street, Rm 322
Jefferson City, MO 65102

File Number:

X00817634

Date Filed: 05/15/2007

Expiration Date: 05/15/2012

Robin Carnahan

Secretary of State

Registration of Fictitious Name

(Submit with filing fee of \$7)

(Must be typed or printed)

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. The fictitious name registration expires 5 years from the filing date. (Chapter 417, RSMo)

The undersigned is doing business under the following name, and at the following address:

Business name to be registered: AT&T Long Distance

Business Address: 5130 Hacienda Blvd.

(P.O. Box may only be used in addition to a physical street address)

City, State and Zip Code: Dublin, CA 94568

The parties having an interest in the business, and the percentage they own are (If a business entity is owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed.):

Name of Owners,
Individual or

Business Entity

Street and Number

City and State

Zip Code

If listed,
Percentage of
ownership
must equal
100%
100%

SBC Long Distance, LLC

5130 Hacienda Blvd.

Dublin, CA 94568

In Affirmation thereof, the facts stated above are true and correct :

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.060 RSMo)

Rebecca Brooks

Rebecca Brooks

5/14/07

Authorized Signature

Printed Name

Date

Authorized Signature

Printed Name

Date

Authorized Signature

Printed Name

Date

Name and address to return filed document:

Name: _____

Address: _____

City, State, and Zip Code: _____

State of Missouri
Fictitious Creation 1 Page(s)



T0713662009



State of Missouri
Robin Carnahan, Secretary of State

Corporations Division
P.O. Box 778 / 600 W. Main Street, Rm 322
Jefferson City, MO 65102

File Number: 200700319009
X00786546
Date Filed: 01/02/2007
Expiration Date: 01/02/2012
Robin Carnahan
Secretary of State

Registration of Fictitious Name

(Submit with filing fee of \$7)
(Must be typed or printed)

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. The fictitious name registration expires 5 years from the filing date. (Chapter 417, RSMo)

The undersigned is doing business under the following name, and at the following address:

Business name to be registered: AT&T Long Distance Service

Business Address: 400 Perimeter Center Terrace NE Suite 400
(P.O. Box may only be used in addition to a physical street address)

City, State and Zip Code: Atlanta GA 30346

The parties having an interest in the business, and the percentage they own are (If a business entity is owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed.):

Name of Owners,
Individual or

Business Entity

Street and Number

City and State

Zip Code

If listed,
Percentage of
ownership
must equal
100%
100%

BellSouth Long Distance, Inc.

400 Perimeter Center Terrace NE Suite, 400 Atlanta GA 30346

In Affirmation thereof, the facts stated above are true and correct :

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.060 RSMo)

Rebecca Brooks

12/5/2006

Authorized Signature

Printed Name

Date

Authorized Signature

Printed Name

Date

Authorized Signature

Printed Name

Date

Name and address to return filed document:

Name: _____

Address: _____

City, State, and Zip Code: _____

State of Missouri
Fictitious Creation 1 Page(s)



T0700201113



State of Missouri

Robin Carnahan, Secretary of State

Corporations Division
P.O. Box 778 / 600 W. Main Street, Rm 322
Jefferson City, MO 65102

File Number: 200611122439
X00733405
Date Filed: 04/21/2006
Expiration Date: 04/21/2011
Robin Carnahan
Secretary of State

Registration of Fictitious Name

(Submit with filing fee of \$7)
(Must be typed or printed)

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. The fictitious name registration expires 5 years from the filing date. (Chapter 417, RSMo)

The undersigned is doing business under the following name, and at the following address:

Business name to be registered: AT&T Long Distance East
Business Address: 310 Orange Street
(P.O. Box may only be used in addition to a physical street address)
City, State and Zip Code: New Haven, CT 06510

The parties having an interest in the business, and the percentage they own are (If a business entity is owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed.):

| Name of Owners, Individual or Business Entity | Street and Number | City and State | Zip Code | If listed, Percentage of ownership must equal |
|---|-------------------|----------------|----------|--|
| SNET America, Inc. | 310 Orange Street | New Haven, CT | 06510 | 100% |
| | | | | 100% |

In Affirmation thereof, the facts stated above are true and correct :

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.060 RSMo)

Rebecca Brooks
Authorized Signature

Rebecca Brooks

Printed Name

4/20/06

Date

Authorized Signature

Printed Name

Date

Authorized Signature

Printed Name

Date

Name and address to return filed document:

Name: _____
Address: _____
City, State, and Zip Code: _____

State of Missouri
Fictitious Creation 1 Page(s)



T0611103604



State of Missouri

Robin Carnahan, Secretary of State

Corporations Division
P.O. Box 778 / 600 W. Main Street, Rm 322
Jefferson City, MO 65102

File Number:

X00827629

Date Filed: 07/02/2007

Expiration Date: 07/02/2012

Robin Carnahan

Secretary of State

Registration of Fictitious Name

(Submit with filing fee of \$7)

(Must be typed or printed)

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. The fictitious name registration expires 5 years from the filing date. (Chapter 417, RSMo)

The undersigned is doing business under the following name, and at the following address:

Business name to be registered: AT&T Southwest

Business Address: 208 S. Akard St.

(P.O. Box may only be used in addition to a physical street address)

City, State and Zip Code: Dallas, TX 75202

The parties having an interest in the business, and the percentage they own are (If a business entity is owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed.):

Name of Owners,

Individual or

Business Entity

Street and Number

City and State

Zip Code

If listed,
Percentage of
ownership
must equal
100%

Southwestern Bell Telephone

208 S. Akard St.

Dallas, TX

75202

100

Company

In Affirmation thereof, the facts stated above are true and correct :

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.060 RSMo)

Rebecca Barth

Authorized Signature

Rebecca Barth.

Printed Name

06/29/07

Date

Authorized Signature

Printed Name

Date

Authorized Signature

Printed Name

Date

Name and address to return filed document:

Name:

Address:

City, State, and Zip Code:

State of Missouri
Fictitious Creation 1 Page(s)





State of Missouri
Robin Carnahan, Secretary of State

Corporations Division
P.O. Box 778 / 600 W. Main Street, Rm 322
Jefferson City, MO 65102

File Number:

X00827627

Date Filed: 07/02/2007

Expiration Date: 07/02/2012

Robin Carnahan

Secretary of State

Registration of Fictitious Name

(Submit with filing fee of \$7)
(Must be typed or printed)

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. The fictitious name registration expires 5 years from the filing date. (Chapter 417, RSMo)

The undersigned is doing business under the following name, and at the following address:

Business name to be registered: AT&T Missouri

Business Address:

208 S. Akard St.

(P.O. Box may only be used in addition to a physical street address)

City, State and Zip Code:

Dallas, TX 75202

The parties having an interest in the business, and the percentage they own are (If a business entity is owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed.):

Name of Owners,

Individual or

Business Entity

Street and Number

City and State

Zip Code

If listed,
Percentage of
ownership
must equal
100%

Southwestern Bell Telephone

208 S. Akard St.

Dallas, TX

75202

100

Company

In Affirmation thereof, the facts stated above are true and correct :

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.060 RSMo)

Rebecca Barth

Authorized Signature

Rebecca Barth

Printed Name

06/29/07

Date

Authorized Signature

Printed Name

Date

Authorized Signature

Printed Name

Date

Name and address to return filed document:

Name: _____

Address: _____

City, State, and Zip Code: _____

State of Missouri
Fictitious Creation 1 Page(s)



T0718306699



State of Missouri
Robin Carnahan, Secretary of State

Corporations Division
P.O. Box 778 / 600 W. Main Street, Rm 322
Jefferson City, MO 65102

File Number: 200703819011
X00794625
Date Filed: 02/02/2007
Expiration Date: 02/02/2012
Robin Carnahan
Secretary of State

Registration of Fictitious Name

(Submit with filing fee of \$7)
(Must be typed or printed)

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. The fictitious name registration expires 5 years from the filing date. (Chapter 417, RSMo)

The undersigned is doing business under the following name, and at the following address:

Business name to be registered: AT&T Mobility

Business Address: 5565 Glenridge Connector,
(P.O. Box may only be used in addition to a physical street address)

City, State and Zip Code: Atlanta, GA 30342

The parties having an interest in the business, and the percentage they own are (If a business entity is owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed.):

| Name of Owners, Individual or Business Entity | Street and Number | City and State | Zip Code | If listed, Percentage of ownership must equal 100% |
|---|---------------------------|----------------|----------|--|
| New Cingular Wireless PCS, LLC | 5565 Glenridge Connector, | Atlanta, GA | 30342 | 100% |
| | | | | |
| | | | | |

In Affirmation thereof, the facts stated above are true and correct :

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.060 RSMo)

Rebecca Brooks
Authorized Signature

Rebecca Brooks
Printed Name

2/1/07
Date

Authorized Signature

Printed Name

Date

Authorized Signature

Printed Name

Date

Name and address to return filed document:

Name: _____
Address: _____
City, State, and Zip Code: _____

State of Missouri
Fictitious Creation 1 Page(s)



ATTACHMENT 9



State of Missouri
Robin Carnahan, Secretary of State

Corporations Division
P.O. Box 778 / 600 W. Main Street, Rm 322
Jefferson City, MO 65102

File Number: 200534822402
X00702933
Date Filed: 12/13/2005
Expiration Date: 12/13/2010
Robin Carnahan
Secretary of State

Registration of Fictitious Name

(Submit with filing fee of \$7)
(Must be typed or printed)

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. The fictitious name registration expires 5 years from the filing date. (Chapter 417, RSMo)

The undersigned is doing business under the following name, and at the following address:

Business name to be registered: Verizon Access Transmission Services

Business Address: 22001 Loudoun County Parkway
(P.O. Box may only be used in addition to a physical street address)

City, State and Zip Code: Asburn VA 20147

The parties having an interest in the business, and the percentage they own are (If a business entity is owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed.):

Name of Owners,

Individual or

Business Entity

Street and Number

City and State

Zip Code

If listed,
Percentage of
ownership
must equal
100%

MCImetro Access Transmission 22001 Loudoun County Parkway Asburn VA 20147

Services LLC (D/B/A MCIMetro LLC)

In Affirmation thereof, the facts stated above are true and correct :

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.060 RSMo)

Jennifer C. McGarey
Authorized Signature

Jennifer C. McGarey
Printed Name

12/08/05
Date

Authorized Signature

Printed Name

Date

Authorized Signature

Printed Name

Date

Name and address to return filed document:

Name: _____
Address: _____
City, State, and Zip Code: _____

State of Missouri
Fictitious Creation 1 Page(s)



T0534716698



State of Missouri
Robin Carnahan, Secretary of State

Corporations Division
P.O. Box 778 / 600 W. Main Street, Rm 322
Jefferson City, MO 65102

File Number: 200534822401
X00702922
Date Filed: 12/13/2005
Expiration Date: 12/13/2010
Robin Carnahan
Secretary of State

Registration of Fictitious Name

(Submit with filing fee of \$7)
(Must be typed or printed)

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. The fictitious name registration expires 5 years from the filing date. (Chapter 417, RSMo)

The undersigned is doing business under the following name, and at the following address:

Business name to be registered: Verizon Business Services

Business Address: 22001 Loudoun County Parkway
(P.O. Box may only be used in addition to a physical street address)

City, State and Zip Code: Ashburn, VA 20147

The parties having an interest in the business, and the percentage they own are (If a business entity is owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed.):

Name of Owners,
Individual or

Business Entity

Street and Number

City and State

Zip Code

If listed,
Percentage of
ownership
must equal
100 %

MCI Communications

22001 Loudoun County Parkw Ashburn, VA

20147

Services Inc.

In Affirmation thereof, the facts stated above are true and correct :

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.060 RSMo)

Jennifer C. McGarey
Authorized Signature

Jennifer C. McGarey
Printed Name

12/08/05
Date

Authorized Signature

Printed Name

Date

Authorized Signature

Printed Name

Date

Name and address to return filed document:

Name: _____
Address: _____
City, State, and Zip Code: _____

State of Missouri
Fictitious Creation 1 Page(s)



T0534716634

Corp. 50 (01/05)



State of Missouri
Rebecca McDowell Cook, Secretary of State
Corporations Division
No. X **375356**
#134054978 \$7.00
BN

Registration of Fictitious Name

(Submit in duplicate with filing fee of \$7)

(Must be typed or printed)

This information is for the use of the public and gives no protection to the name. There is no provision in this Chapter to keep another person or business from adopting and using the same name. (Chapter 417, RSMo.)

We, the undersigned, are doing business under the following name, and at the following address:

Name to be registered: Verizon Long Distance
Missouri Business Address: 1320 North Court House Rd., 9th Floor
(P.O. Boxes not accepted)
City, State and Zip Code: Arlington, VA 22201

The parties having an interest in the business, and the percentage they own are (if a business entity is owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed):

| Name of Owners, Individual or Business Entity | Street and Number | City | State and Zip Code | If listed, Percentage of ownership must equal 100% |
|---|------------------------------------|---------------|--------------------------|--|
| Bell Atlantic Communications, Inc. | 1320 N. Court House Rd., 9th Floor | Arlington, Va | 22201 | 100% |
| F419078AG | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

Return to: Secretary of State
Corporations Division
P.O. Box 778
Jefferson City, Mo. 65102

FILED

JUN 26 2000

(Over)

Rebecca McDowell Cook
SECRETARY OF STATE

The undersigned, being all the parties owning interest in the above company, being duly sworn, upon their oaths each did say that the statements and matters set forth herein are true.

375356

Individual
Owners
Sign Here

X _____ X _____
X _____ X _____
X _____ X _____

The undersigned business entity has caused this application to be executed in its name by its

President

Title of Authorized Person

on this

6/21/00
month/day/year

If
Business Entity
Is
Owner,
Authorized
Person
Execute
Here

Maura C. Breen
Authorized Signature (If corporation, President or Vice President)

Maura C. Breen, President

Printed Name Title

Gilbert A. Smith
If corporation, Signature of Secretary or Asst. Secretary

Gilbert A. Smith, Secretary

Printed Name Title

(Corporate Seal)
If no seal, state "none".

State of

New York

County of

Westchester

SS

I, Dina Cozzubbo, A Notary Public, do hereby certify that on 06/21/00
month/day/year

personally appeared before me Maura C. Breen, and being duly sworn by me, acknowledged that he/she signed as his/her own free act and deed the foregoing document in the capacity therein set forth and declared that the statements therein contained are true.

IN WITNESS WHEREOF, I have hereunto set my hand and seal the day and year before written.

(Notarial Seal or Stamp)

Dina Cozzubbo
Notary Public

City/County of ARLINGTON
Commonwealth of Virginia

Sworn to and subscribed before me this 19th
day of June, 19 2000
Witness my hand and official seal.

Cheryl C. Pomeroy Notary Public

My Comm. Exps. 1/30, 2000

My commission expires

3/14/2002

by Gilbert A. Smith
My County of Commission

Westchester, NY

Corp: #56 (S/99)



State of Missouri

No. X **376044**

Rebecca McDowell Cook, Secretary of State

#112043880 \$7.00

Corporations Division

BN

Registration of Fictitious Name

(Submit in duplicate with filing fee of \$7)

(Must be typed or printed)

This information is for the use of the public and gives no protection to the name. There is no provision in this Chapter to keep another person or business from adopting and using the same name. (Chapter 417, RSMo.)

We, the undersigned, are doing business under the following name, and at the following address:

Name to be registered: Verizon Midwest
Missouri Business Address: 1000 GTE Drive
(P.O. Boxes not accepted)
City, State and Zip Code: Wentzville, MO 63385

The parties having an interest in the business, and the percentage they own are (if a business entity is owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed):

| Name of Owners, Individual or Business Entity | Street and Number | City | State and Zip Code | If listed, Percentage of ownership must equal 100% |
|---|-------------------|------------|--------------------------|--|
| GTE Midwest Incorporated | 1000 GTE Drive | Wentzville | MO 6338 | |
| F369029AG | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

Return to: Secretary of State
Corporations Division
P.O. Box 778
Jefferson City, Mo. 65102

FILED

JUL 12 2000

Rebecca McDowell Cook
SECRETARY OF STATE

(Over)

376044

The undersigned, being all the parties owning interest in the above company, being duly sworn, upon their oaths each did say that the statements and matters set forth herein are true.

Individual
Owners
Sign Here

{

X _____ X _____
X _____ X _____
X _____ X _____

The undersigned business entity has caused this application to be executed in its name by its

Vice President-General Counsel, on this 30th day of June, 2000
Title of Authorized Person month/day/year

If
Business Entity
Is
Owner,
Authorized
Person
Execute
Here

| | | |
|--|---|-------|
| <u>William G. Mundy</u> | <u>William G. Mundy, Vice President-General Counsel</u> | |
| Authorized Signature (If corporation, President or Vice President) | Printed Name | Title |
| <u>Rosalynn Christian</u> | <u>Rosalynn Christian, Assistant Secretary</u> | |
| If corporation, Signature of Secretary or Asst. Secretary | Printed Name | Title |

(Corporate Seal)
If no seal, state "none".

State of ~~Missouri~~ TEXAS

County of DALLAS

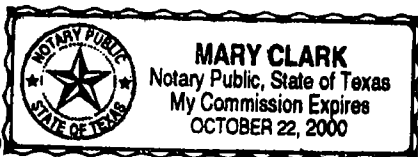
} ss

I, Mary Clark, A Notary Public, do hereby certify that on June 30, 2000
month/day/year

personally appeared before me William G. Mundy and Rosalynn Christian, and being duly sworn by me, acknowledged that he/she signed as his/her own free act and deed the foregoing document in the capacity therein set forth and declared that the statements therein contained are true.

IN WITNESS WHEREOF, I have hereunto set my hand and seal the day and year before written.

(Notarial Seal or Stamp)



Mary Clark
Notary Public

My commission expires _____

My County of Commission _____

Corp. #56 (5/99)



Corporations Division
P.O. Box 778, Jefferson City, MO 65102

James C. K
600 W. Ma

File Number: 200331809011

Charter # X00552199

Date Filed: 11/13/2003 10:15 AM

Matt Blunt

Secretary of State

Matt Blunt

Secretary of State

Registration of Fictitious Name

(Submit in duplicate with filing fee of \$7)

(Must be typed or printed)

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. (Chapter 417, RSMo)

The undersigned is doing business under the following name, and at the following address:

Business name to be registered: Verizon Wireless
Business Address: 180 Washington Valley Rd.
(P.O. Box alone not acceptable)
City, State and Zip Code: Bedminster, NJ 07921

The parties having an interest in the business, and the percentage they own are (if a business entity is owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed):

| Name of Owners, Individual or Business Entity | Street and Number | City and State | Zip Code | If listed, Percentage of ownership must equal 100% |
|---|-----------------------|----------------|----------|--|
| Verizon Wireless (VAW) LLC | 180 Washington Valley | Bedminster, NJ | 07921 | |

In Affirmation thereof, the facts stated above are true:

(The undersigned understands that false statements made in this filing are subject to the penalties of a false declaration under Section 575.060 RSMo 1986.)

Alice Brennan Alice Brennan, Manager 11/11/03
(Authorized Signature) (Printed Name) (Date)

(Authorized Signature) (Printed Name) (Date)

(Authorized Signature) (Printed Name) (Date)

FOR OFFICIAL USE ONLY

Check # _____
Amount: _____
Filer's Initials: _____

Corp. 56 (8/02)

State of Missouri
Fictitious Creation 1 Page(s)



T0331707022



State of Missouri

Robin Carnahan, Secretary of State

Corporations Division
P.O. Box 778 / 600 W. Main Street, Rm 322
Jefferson City, MO 65102

File Number: 200517308014
X00667785
Date Filed: 06/21/2005
Expiration Date: 06/21/2010
Robin Carnahan
Secretary of State

Registration of Fictitious Name

(Submit with filing fee of \$7)
(Must be typed or printed)

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. The fictitious name registration expires 5 years from the filing date. (Chapter 417, RSMo)

The undersigned is doing business under the following name, and at the following address:

Business name to be registered: Verizon Wireless

Business Address: 180 Washington Valley Road

(P.O. Box may only be used in addition to a physical street address)

City, State and Zip Code: Bedminster, New Jersey 07921

The parties having an interest in the business, and the percentage they own are (If a business entity is owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed.):

Name of Owners,

Individual or

Business Entity

Cellco Partnership

Street and Number

180 Washington Valley Rd

City and State

Bedminster, NJ

Zip Code

07921

If listed,
Percentage of
ownership
must equal
100%

CyberTel Cellular Telephone 180 Washington Valley Rd Bedminster, NJ 07921

Company

In Affirmation thereof, the facts stated above are true and correct :

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.060 RSMo)

Cellco Partnership d/b/a Verizon Wireless

Karen M. Shipman, Assistant Secretary

6/16/2005

Authorized Signature

Printed Name

Date

Authorized Signature

Printed Name

Date

Authorized Signature

Printed Name

Date

Name and address to return filed document:

Name: Sindy N. Kelsick c/o Verizon Wireless

Address: 180 Washington Valley Road

City, State, and Zip Code: Bedminster, NJ 07921

State of Missouri
Fictitious Creation 1 Page(s)

T0517216648

Corp. 56 (01/05)



State of Missouri
Robin Carnahan, Secretary of State

Corporations Division
P.O. Box 778 / 600 W. Main Street, Rm 322
Jefferson City, MO 65102

File Number:

X00849972

Date Filed: 10/19/2007

Expiration Date: 10/19/2012

Robin Carnahan

Secretary of State

Registration of Fictitious Name

(Submit with filing fee of \$7)
(Must be typed or printed)

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. The fictitious name registration expires 5 years from the filing date. (Chapter 417, RSMo)

The undersigned is doing business under the following name, and at the following address:

Business name to be registered:

Verizon Wireless

Business Address:

One Verizon Way

(P.O. Box may only be used in addition to a physical street address)

City, State and Zip Code:

Basking Ridge, NJ 07920

The parties having an interest in the business, and the percentage they own are (If a business entity is owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed.):

Name of Owners,
Individual or
Business Entity

Street and Number

City and State

Zip Code

If listed,
Percentage of
ownership
must equal
100%

Celco Partnership, One Verizon Way, Basking Ridge, NJ 07920

99%

Verizon Wireless (VAW) LLC, One Verizon Way, Basking Ridge, NJ 07920

1%

In Affirmation thereof, the facts stated above are true and correct:

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.060 RSMo)

CyberTel Cellular Telephone Company
by: Celco Partnership, Its General Partner and Verizon Wireless (VAW) LLC

Authorized Signature

Karen M. Shipman

Printed Name
Karen M. Shipman
Assistant Secretary

Printed Name

Date

10/18/07

Date

Authorized Signature

Printed Name

Date

Name and address to return filed document:

Name: _____

Address: _____

City, State, and Zip Code: _____

State of Missouri
Fictitious Creation 1 Page(s)



T0729206634

ATTACHMENT 10

Delaware

PAGE 1

The First State

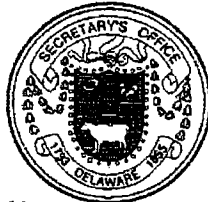
I, HARRIET SMITH WINDSOR, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF AMENDMENT OF "AQUILA, INC.", CHANGING ITS NAME FROM "AQUILA, INC." TO "KCP&L GREATER MISSOURI OPERATIONS COMPANY", FILED IN THIS OFFICE ON THE SEVENTEENTH DAY OF OCTOBER, A.D. 2008, AT 9:14 O'CLOCK A.M.

A FILED COPY OF THIS CERTIFICATE HAS BEEN FORWARDED TO THE NEW CASTLE COUNTY RECORDER OF DEEDS.

2101053 8100

081045472

You may verify this certificate online
at corp.delaware.gov/authver.shtml



Harriet Smith Windsor

Harriet Smith Windsor, Secretary of State

AUTHENTICATION: 6916501

DATE: 10-17-08

State of Delaware
Secretary of State
Division of Corporations
Delivered 09:14 AM 10/17/2008
FILED 09:14 AM 10/17/2008
SRV 081045472 - 2101053 FILE

**CERTIFICATE OF AMENDMENT
OF
AQUILA, INC.**

Aquila, Inc., a corporation organized and existing under and by virtue of the General Corporation Law of the State of Delaware,

DOES HEREBY CERTIFY:

FIRST: That the Board of Directors of said corporation, by the unanimous written consent of its members, filed with the minutes of the Board, adopted a resolution proposing and declaring advisable that the name of said corporation be changed to "KCP&L Greater Missouri Operations Company"

SECOND: That, pursuant to the aforementioned resolution adopted by the Board of Directors of said corporation, the Certificate of Incorporation of Aquila, Inc. be amended by changing Article One thereof so that, as amended, said Article shall be and read as follows:

The name of the Corporation is KCP&L Greater Missouri Operations Company (the "Corporation").

THIRD: That in lieu of a meeting and vote the Sole Shareholder, the Sole Shareholder has given unanimous written consent to said amendment in accordance with the provisions of Section 228 of the General Corporation Law of the State of Delaware.

FOURTH: That the aforesaid amendment was duly adopted in accordance with the applicable provisions of Sections 242 and 228 of the General Corporation Law of the State of Delaware.

IN WITNESS WHEREOF, Mark G. English, Assistant Secretary of Aquila, Inc. has caused this certificate to be signed this 17 day of October, 2008.

AQUILA, INC.

By: Mark G. English
Assistant Secretary



F00300558

CERTIFICATE OF CORPORATE RECORDS

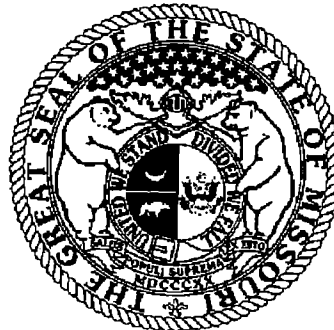
KCP&L GREATER MISSOURI OPERATIONS COMPANY

I, ROBIN CARNAHAN, Secretary of the State of the State of Missouri and Keeper of the Great Seal thereof, do hereby certify that the annexed pages contain a full, true and complete copy of the original documents on file and of record in this office for which certification has been requested.

IN TESTIMONY WHEREOF, I have set my hand and imprinted the GREAT SEAL of the State of Missouri, on this, the 28th day of October, 2008

Robin Carnahan

Secretary of State





State of Missouri
Robin Carnahan, Secretary of State

Corporations Division
P.O. Box 778 / 600 W. Main Street, Rm 322
Jefferson City, MO 65102

File Number:
F00300558
Date Filed: 10/22/2008
Robin Carnahan
Secretary of State

**Application for an Amended Certificate of
Authority for a Foreign Corporation**

Submit with filing fee of \$25.00

The below corporation, relating to amending its certificate of authority of Foreign Corporation, does hereby state:

- (1) Its name is: Aquila Foreign Qualifications Corporation
and is incorporated in the State of: Delaware; and it
was qualified in the State of Missouri on March 27, 1987
month/day/year
- (2) By appropriate corporate action on: October 17, 2008, the corporation:
month/day/year
- (1) Changed its corporate name to: KCP&L Greater Missouri Operations Company
Name it will use in Missouri if new name not available: _____
- (2) Changed its period of duration to: _____
- (3) Changed the state or country of its incorporation to: _____
- (3) There is attached hereto a Certificate of the Secretary of State of the State of Delaware
relating to the amendment(s), set forth in item 2 above and showing that the Corporation is in existence and in good
standing in said State.
- (4) The effective date of this document is the date it is filed by the Secretary of State of Missouri, unless you indicate
a future date, as follows: _____
(Date may not be more than 90 days after the filing date in this office)

In Affirmation thereof, the facts stated above are true and correct:

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.040,
RSMo)


Authorized Signature

Mark G. English

Printed Name

Assistant Secretary

Title

month/day/year

Attached is an original current certificate attesting to the change, duly authenticated by the secretary of state or other official hav-
ing custody of corporate records in the state or country of incorporation.

Name and address to return filed document:

Name: Jessica Rutland
Address: 120 W 12 Street, Ste 1700
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State of Missouri
Amend/Restate - Gen Bus 8 Page(s)



T0829616650

ATTACHMENT 11



IPLT #51

May 8, 2008

(Less than eight weeks until July 1st)

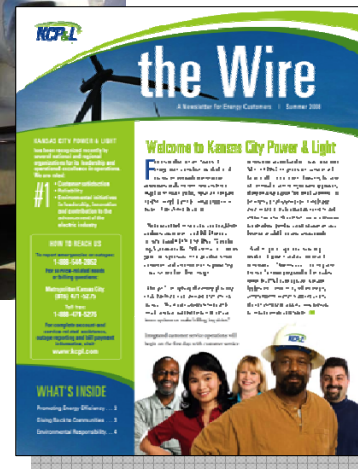
Teams identified activities for consideration - primarily in IT and Customer Service

| Team | Pre-Close Activity | When | Rationale/ Benefits |
|-------------------------|---|--|--|
| IT | <ul style="list-style-type: none"> • Data and systems cutover • Set up user access/ security • Conversion of Sales Logix | <ul style="list-style-type: none"> • Weekend before close | <ul style="list-style-type: none"> • Necessary for Day 1 operation • Day 1 availability crucial to most teams, particularly F&A and CS • Weekend cutover provides least business disruption |
| Customer Service | <ul style="list-style-type: none"> • Black Hills takes live Aquila calls | <ul style="list-style-type: none"> • Upon completion of CIS cutover (Sun. or Mon. prior to close) | <ul style="list-style-type: none"> • Inevitable once cutover occurs • Training in place and CSRs ready for live calls |
| Accounting | <ul style="list-style-type: none"> • Begin final ILA close process | <ul style="list-style-type: none"> • Weekend before close | <ul style="list-style-type: none"> • Allows for Accounting of new entities to begin Day 1 and with least interruption to business |
| Facilities | <ul style="list-style-type: none"> • People moves from 20 W 9th to 1201 Walnut | <ul style="list-style-type: none"> • Weekend before close | <ul style="list-style-type: none"> • Work in new position on Day 1 • Provides more orderly process for transfer employees |
| Fuel | <ul style="list-style-type: none"> • Input fuel contracts into FuelWorx system | <ul style="list-style-type: none"> • Prior to close | <ul style="list-style-type: none"> • Not having contracts in by Day 1 adversely impacts Accounting |
| Branding | <ul style="list-style-type: none"> • Rebranding of certain facilities, field assets, etc. | <ul style="list-style-type: none"> • 1-2 days prior to close | <ul style="list-style-type: none"> • Ability to have a common brand in place on Day 1 |

KCP&L has developed a new and dynamic brand identity that will be launched in a two-phase process

- The Public Affairs team will support the overall brand process and timeline, however each team is responsible for ordering/implementing its own materials
 - **Phase 1** (next week): For external facing groups, begin ordering in advance of Day 1 roll-out; for internal teams, begin ordering/using based on need and as current stocks/supplies allow
 - **Phase 2** (July 1): Incoming employees and assets will receive the new KCP&L brand on Day 1.
- Current KCP&L employees and assets will continue to use the existing brand inventory until stock runs down. A “sundown” date (eg. 12/31/08) will be set for re-branding all materials.
- A formal “Brand Launch” celebration is to follow soon after Day 1.
- Guidelines and design templates will be issued to all teams, after review with the Senior Strategy team and at the Leadership Forum next week

The logo and brand identity will be rolled out to all areas of the company



Bill Print – Current Project Status

Day 1 Scope:

- KCPL will continue to manage bills in-house & Aquila will continue to outsource to Regulus
- New Logo & common phone numbers will be used Day 1 on KCPL & Aquila Bills, Notices and Letters
- All Aquila branding will be removed and replaced with KCP&L on the Aquila Missouri customer's bill
- Consistent billing Inserts/messages will be leveraged for both Aquila and KCP&L as applicable

High Level Progress:

- Code changes are complete, tested, reviewed and approved for both the KCP&L and Aquila bills, notices and letters
- A final business sign-off of the Aquila changes occurred on Friday May 2nd
- Bill Message gaps were discussed and documented with a plan to address
- Minor issues are being worked, but project is on-track for Day 1

Current Project Risks / Issues:

- Regulus requires two weeks for final User Acceptance Testing before the go-live implementation.
 - Mitigation – Regression testing will commence on June 16 if the Day 1 announcement has not yet been made

Bill Print – Day 1 Highlights

Key Bill Changes

- Aquila Phone number/ logo/ branding will be removed
- The new KCP&L Logo and Phone number will be implemented
- See hand-out prototypes

Operational Highlights

- Message boards for KCP&L and Aquila will be managed by KCP&L after Day 1
 - Lorie Owen (CIS+) & Mary Curts (Doc 1)
 - Sharon Tilley will be coordinating to ensure consistency
- Aquila customers will receive all new stock on Day 1
- KCP&L will leverage current stock (old logo) for the KCP&L customers until the supply runs out

Bill Print – Customer Communication and Roll-out Schedule

Two Weeks Prior
to Day One

Mailing to ILA Customers

- Bill Downey letter (prepared by Margie)
- Q&As (prepared by Margie)
- Magnet insert* (prepared by Sharon)
- Special issue of The Wire (prepared by Sharon)

Mailing: Strahm Automation
17th & Broadway

* Potential Risk - Aquila customers would start calling KCPL number if they receive magnets early

Day 1 Month #1 (July '08)
Beginning with Cycle 1

Billings to ILA Customers

- Special 6/panel insert that reiterates key phone numbers, info, etc. (prepared by Sharon)
- Mailing: Regulus

Billings to KCPL Customers

- Special issue of The Wire
 - Magnet insert
- Regulatory EER insert for Kansas
- Mailing: KCP&L insertion

Mailing KCPL Paperless Customers

- Special issue of The Wire
 - Magnet insert
- Mailing: Strahm Automation

Month #2 (August '08)
Beginning with Cycle 1

KCPL/ILA Billings

Combined or segmented inserts,
as appropriate

- Mailing: KCP&L insertion
Regulus

If Month #2 is August, a segmented issue of The Wire is scheduled. The desire is to make at least one spread of the newsletter mutual, so only one spread needs to be customized.