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

In the Matter of Eddie Shepherd,	)	
Complainant,	)	
Complainant,	)	
v.	)	Case No. EC-2011-0373
	)	
KCP&L Greater Missouri Operations Company,	)	
	)	
Respondent.	)	

# KCP&L GREATER MISSOURI OPERATIONS COMPANY'S MOTION FOR SUMMARY DISPOSITION

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

- 1. On May 16, 2011, Complainant filed a Complaint with the Commission. The Complainant seeks adjustments to several bills due to Complainant's belief that they do not accurately reflect his electricity usage. According to the complaint, Complainant believes the meter on the Property has been registering more electricity than consumption following a lightning strike in July, 2010 and is requesting relief from high bills allegedly brought on by a faulty meter.
- 2. Adjustments to customer bills are addressed under a GMO tariff approved by the Commission. GMO's tariff (Rule 5.04(C) (Sheet R-33)) provides that no billing adjustment will be made if, after the meter is tested, the meter error is found to be less than 3%. Complainant's meters tested within this 3% standard.

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

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

Respectfully submitted,

#### <u>|s| Roger W. Steiner</u>

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#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing have been mailed, handdelivered, transmitted by facsimile or electronically mailed to all parties of record on this 4th day of November, 2011.

### <u>|s| Roger W. Steiner</u>

Attorney for KCP&L Greater Missouri Operations Company