

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

In the Matter of the Application of KCP&L)	
Greater Missouri Operations Company for)	<u>Case No. ER-2010-0356</u>
Approval to Make Certain Changes in its)	
Charges for Electric Service)	

PUBLIC COUNSEL’S NOTICE OF OBJECTIONS TO TARIFFS

COMES NOW the Office of the Public Counsel and for its Notice of Objections to Tariffs states as follows:

1. On May 4, 2011, the Commission issued its Report and Order with an effective date of May 14. On May 27, the Commission issued an Order of Clarification and Modification. The latter order required any objections to the new compliance tariffs to be filed no later than June 2 at 9:00 a.m.

2. The Commission is under no legal obligation to rush KCP&L Greater Missouri Operations’ (GMO’s) rate increase into effect at the expense of the parties’ ability to examine and respond to a very unusual tariff filing. The tariff filing was made after 1:00 P.M. on May 31, and the workpapers supporting that filing were not provided to the parties until 4:20 P.M on May 31. After a preliminary examination, which is all that is possible at this point, Public Counsel has noted a number of objections to the new compliance tariffs.

3. The Commission has provided notice that it intends to take up an “Order Regarding Compliance Tariffs” at its public meeting today, June 1 at 10:00 A.M. – less than 24 hours after the tariffs were filed and less than 18 hours after the workpapers were provided. In addition, the Commission is well aware that it has ordered briefs to be filed in Case No. ER-

2011-0028 (a major rate increase case for Ameren Missouri, and a case which involves many of the same parties as the instant case) on June 1.

4. This Notice is being filed to make the Commission aware – before its 10:00 A.M. meeting – that Public Counsel does have objections to the new compliance tariffs, and would certainly object to the Commission issuing on June 1 an order approving them, approving any part of them, or stating the Commission’s intent to allow them to go into effect without Commission action. Public Counsel will endeavor to meet the Commission’s unreasonable deadline of June 2 at 9:00 A.M. to file its objections.

WHEREFORE Public Counsel respectfully submits this Notice of Objections to Tariffs.

Respectfully submitted,

OFFICE OF THE Public Counsel

/s/ Lewis R. Mills, Jr.

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the parties of record this 1st day of June 2011.

/s/ Lewis R. Mills, Jr.
