

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

In the Matter of the Application of Kansas City)
Power & Light Company for Approval to)
Make Certain Changes in its Charges for)
Electric Service to Implement its Regulatory)
Plan.)

File No. ER-2010-0355
Tariff No JE-2010-0692

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for)
Approval to Make Certain Changes in its)
Charges for Electric Service.)

File No. ER-2010-0356
Tariff No. JE-2010-0693

CITY OF LEE’S SUMMIT’S STATEMENT OF POSITION

Comes now the City of Lee’s Summit, Missouri, (the “City” or “Lee’s Summit”) by and through counsel, and submits this statement of position on the list of issues filed by the parties in this case on January 7, 2011:

88. Municipal Street Lighting

Should GMO’s proposed increase in rates for its Municipal Street Lighting Service be applied to all elements involved in the leased street light system?

No. GMO proposes to raise the rate for the street lighting system across all cost components of that rate, some of which have not increased. Absent a clear study on any increases GMO claims to be experiencing in non-energy related costs--which includes material, installation and maintenance costs—for supplying the street lighting service, the Commission should approve an increase in **only GMO’s energy costs** for the service, if any increase is to be approved at all.

89. **Street Lighting Purchase:**

Should the effect on current negotiations between Lee's Summit and GMO for purchase of the leased street light system be considered in setting increased rates for Municipal Street Lighting Service?

Yes. After completing an evaluation and benefit/cost study of the leased street light system, the City commenced negotiations with GMO for purchase of the system approximately 12 to 13 months ago. An increase in the rates for the street lighting service will translate into a higher lease cost and as the lease cost increases, the cost to purchase the system from GMO will also likely increase because the system will have a higher valuation by GMO. To avoid unfair impacts on 1) the cost of the leased system and 2) on the City's ongoing negotiations toward purchase, the Commission should not approve a rate increase for the service that presumes GMO has experienced increases in the non-energy related costs which have remained static or have decreased. As mentioned previously, there is no proof that non energy related costs in supplying the street lighting service have increased.

Lee's Summit takes no position on the other issues set out by the parties, without impairment of its right to brief and argue those issues to the Commission as the evidence may unfold at hearing.

Respectfully submitted,

/s/ Mark W. Comley

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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via email on this 12th day of January, 2011, to all parties of record.

/s/ Mark W. Comley

Mark W. Comley