

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

In the Matter of Kansas City Power & Light)
Company's Request for Authority to Implement) Case No. ER-2012-0174
a General Rate Increase for Electric Service)

EMPIRE'S STATEMENT OF POSITION

COMES NOW The Empire District Electric Company ("Empire"), by counsel, and respectfully files its Statement of Position in the above-captioned case. In this regard, Empire states as follows:

1. The Commission's scheduling order in this case directed the filing of statements of position in this case, with the statements due on October 12, 2012.
2. Empire has not filed testimony in this case, but is participating in this case because of the limited purpose of the issue of the ratemaking treatment of the leases and agreements regarding the common facilities at Iatan.
3. Given Empire's somewhat limited involvement in this case, Empire at this time takes no position on the issues set forth in the issue list filed herein. Empire reserves its right to assert its positions on various issues when evidence is presented during the evidentiary hearings in this case, to file post-hearing briefs, to file true-up testimony, or to otherwise participate fully in further proceedings in this case.

Respectfully submitted,

/s/ Diana C. Carter
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ATTORNEYS FOR THE EMPIRE
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission to all counsel of record on this 12th day of October, 2012.

/s/ Diana C. Carter