

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

In the Matter of the Application of Aquila, Inc.,	)	
d/b/a KCP&L Greater Missouri Operations	)	<b><u>Case No. ER-2009-0090</u></b>
Company, for Approval to Make Certain	)	<b><u>Tariff No. JE-2009-0193</u></b>
Changes in its Charges for Electric Service	)	

**UNIONS' STATEMENT OF POSITION AND REQUEST TO LATE-FILE**

COME NOW the International Brotherhood of Electrical Workers, Local Unions No. 412, 1464, and 1613, ("Locals 412, 1464, and 1613" or the "Unions") by and through their counsel, Blake & Uhlig, P.A., and respectfully file their Statement of Position in the above-captioned matter, and request leave to file the same day out-of-time. In support of this Application, the Petitioners state as follows:

1. The Commission's November 20, 2008 Order Setting Procedural Schedules directed the filing of statements of position in this case, with the statements due on April 15, 2009.

2. The Unions have not filed testimony in this case, but are participating in this case because they have a direct interest in this proceeding in that they represent employees who may be affected by Orders entered by the Commission in this proceeding, and, accordingly, the Unions are interested parties in this proceeding.

3. Given the Unions' somewhat limited involvement in this case to date, the Unions take no current position on the issues set forth in the issue lists (filed by Staff and KCPL, respectively) herein. However, to the extent that said Application may impact on the wages, benefits, and terms and conditions of employment of the employees that the Unions represent, the Unions reserve the right to participate in the proceedings to the

extent necessary to protect the interests of their members and to assert their 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..

4. The Unions request leave to file this Statement one day out-of-time insofar as the undersigned counsel has been out of town and was unable to prepare and file this Statement until today. The undersigned counsel apologizes for any inconvenience.

Dated: April 16, 2009

Respectfully submitted,

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By: /s/Jane L. Williams  
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ATTORNEYS FOR IBEW LOCALS 412,  
1464, AND 1613

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was served via electronic mail (e-mail) or via regular mail on this 16th day of April, 2009, on counsel for all parties to this case:

/s/Jane L. Williams  
Jane L. Williams