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January 12, 2000

FILED
JAN 1 1 2000

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 3660
Jefferson City, Missouri 65102

Missouri Public Service Commission

RE:

GST Steel Company v. Kansas City Power & Light Company

Case No. EC-99-553

Dear Mr. Roberts:

Enclosed are the original and fourteen (14) copies of Affidavit of William G. Riggins for filing in the above-referenced matter. A facsimile version of the Affidavit was filed yesterday with Respondent Kansas City Power & Light Company's Motion To Excuse William G. Riggins From The Show Cause Hearing. A copy of the foregoing Affidavit has been hand-delivered or mailed this date to Parties of Record.

Thank you for your attention to this matter.

Sincerely,

James M. Fischer

/jr Enclosures

cc: Parties of Record.

FILED

JAN 1 1 2000

Missouri Public Service Commission

## AFFIDAVIT OF WILLIAM G. RIGGINS

Assistant Chief Legal Officer Kansas City Power & Light Company

Case No. EC-99-553

STATE OF MISSOURI	)	
	)	SS
COUNTY OF JACKSON	)	

- 1. My name is William G. Riggins. I am Assistant Chief Legal Officer for Kansas City Power & Light Company (KCPL). In that role, I have management responsibility for the Company's legal, regulatory and governmental functions. I also, on occasion, represent KCPL as counsel in regulatory and judicial proceedings, or in other matters.
- 2. My involvement in this case as counsel for KCPL has been limited to a single instance -- specifically, I assisted in the preparation of a pleading filed by KCPL on December 13, 1999. I assisted in the preparation of that pleading only because Gerald A. Reynolds, KCPL's in-house counsel of record, was unavailable.
- 3. Because of my limited involvement as counsel in this case, I had not planned to attend the prehearing conference on January 18, 2000. Accordingly, I previously made arrangements to meet with several members of a Washington, D.C. law firm retained by KCPL to assist it with certain time-sensitive corporate and regulatory matters. The meeting was and is scheduled for January 17-19 in Washington. Given the matters under discussion, my presence at the meeting is required. After receiving the Commission's January 6 Order to Show Cause in this case, I attempted to reschedule the

meeting. However, because of the previous commitments of the other individuals involved, it is not possible to reschedule the meeting and still deal with the issues that need to be considered in a timely fashion.

FURTHER AFFIANT SAITH NOT.

WILLIAM G. RIGGINS

On this //th day of January, 2000, William G. Riggins, of lawful age, to me personally known, personally appeared before me and having been first duly sworn upon oath, stated that he had read the above and foregoing affidavit and that the facts set forth therein were true to the best of his knowledge and belief, whereupon he subscribed his name thereto in my presence.

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Notary Public in and for said

County and State

My Commission expires:

CAROL SIVILS

otgay Public - Notary Sec

-... State of Missouri

Clay County

OTARY PURCE

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