

**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 OBJECTION TO TARIFFS

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

1. On May 4, 2011, the Commission issued its Report and Order with an effective date of May 14, 2011. The Report and Order ordered KCP&L Greater Missouri Operations Company (GMO) to file tariffs in compliance with the Report and Order no later than May 12.

2. As noted in Public Counsel’s Application for Rehearing filed on May 12, the Report and Order requires GMO to file tariffs that will increase rates for customers in the St. Joseph area (the L&P division) by \$29.3 million, well in excess of the amount requested and well in excess of the amount repeatedly referred to in the notices to customers, the media, governing bodies and elected officials.

3. On May 12, GMO filed tariffs that would increase rates for customers in the L&P division by \$29.3 million.

4. Public Counsel objects to these tariffs because they would impose an unlawful and unreasonable increase on L&P customers.

WHEREFORE Public Counsel respectfully requests that the Commission grant rehearing of its May 4, 2011 Report and Order.

Respectfully submitted,

Office of the Public Counsel

/s/ **Lewis R. Mills, Jr.**

By: _____

Lewis R. Mills, Jr. (#35275)
Public Counsel
P O Box 2230
Jefferson City, MO 65102
(573) 751-1304
(573) 751-5562 FAX
lewis.mills@ded.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the parties of record this 16th day of May 2011.

General Counsel Office
Missouri Public Service
Commission
GenCounsel@psc.mo.gov

Mills Lewis
Office of the Public Counsel
opcservice@ded.mo.gov

Williams Nathan
Missouri Public Service
Commission
Nathan.Williams@psc.mo.gov

Deutsch B James
Missouri Retailers Association
jdeutsch@blitzbardgett.com

Schwarz R Thomas
Missouri Retailers Association
tschwarz@blitzbardgett.com

Sader S Neil
North Kansas City Hospital
nsader@sadergarvin.com

Zakoura P James
North Kansas City Hospital
jim@smizak-law.com

Sader S Neil
Research Belton Hospital
nsader@sadergarvin.com

Zakoura P James
Research Belton Hospital
jim@smizak-law.com

Sader S Neil
Saint Luke's East - Lee's Summit
nsader@sadergarvin.com

Zakoura P James
Saint Luke's East - Lee's Summit
jim@smizak-law.com

Sader S Neil
Saint Luke's Northland Hospital -
Smithville Campus
nsader@sadergarvin.com

Zakoura P James
Saint Luke's Northland Hospital -
Smithville Campus
jim@smizak-law.com

Woodsmall David
Sedalia Industrial Energy Users
Association
dwoodsmall@fcplaw.com

Finnegan D Jeremiah
Sedalia Industrial Energy Users
Association
jfinnegan@fcplaw.com

Conrad Stuart
Sedalia Industrial Energy Users
Association
stucon@fcplaw.com

Sader S Neil
St. Mary's Medical Center
nsader@sadergarvin.com

Zakoura P James
St. Mary's Medical Center
jim@smizak-law.com

Lowery B James
Union Electric Company
lowery@smithlewis.com

Byrne M Thomas
Union Electric Company
AmerenMOService@ameren.com

Tatro Wendy
Union Electric Company
AmerenMOService@ameren.com

Coffman B John
AARP
john@johncoffman.net

Woodsmall David
AG Processing, Inc
dwoodsmall@fcplaw.com

Finnegan D Jeremiah
AG Processing, Inc
jfinnegan@fcplaw.com

Conrad Stuart
AG Processing, Inc
stucon@fcplaw.com

Comley W Mark
City of Kansas City, Missouri
comleym@ncrpc.com

Williams S Teresa
City of Lee's Summit, Missouri
Teresa.Williams@cityofls.net

Steinmeier D William
City of St. Joseph, Missouri
wds@wdspsc.com

Coffman B John
Consumers Council of Missouri
john@johncoffman.net

Lumley J Carl
Dogwood Energy, LLC
clumley@lawfirmemail.com

Carter C Diana
Empire District Electric Company,
The
DCarter@brydonlaw.com

Swearengen C James
Empire District Electric Company,
The
LRackers@brydonlaw.com

Jones E Steven
Federal Executive Agencies

McNeill L Shayla
Federal Executive Agencies
shayla.mcneill@tyndall.af.mil

Amash E Michael
IBEW Local Union 1464
mea@blake-uhlig.com

Waers James Richard
IBEW Local Union 1464
jrw@blake-uhlig.com

Amash E Michael
IBEW Local Union 1613
mea@blake-uhlig.com

Waers James Richard
IBEW Local Union 1613
jrw@blake-uhlig.com

Amash E Michael
IBEW Local Union 412
mea@blake-uhlig.com

Waers James Richard
IBEW Local Union 412
jrw@blake-uhlig.com

Cafer Glenda
KCP&L Greater Missouri
Operations Company
gcafer@sbcglobal.net

Cunningham B Susan
KCP&L Greater Missouri
Operations Company
susan.cunningham@srdenton.com

Gilbreath A Lisa
KCP&L Greater Missouri
Operations Company
lisa.gilbreath@srdenton.com

Fischer M James
KCP&L Greater Missouri
Operations Company
jfischerpc@aol.com

Dority W Larry
KCP&L Greater Missouri
Operations Company
lwdority@sprintmail.com

Gibb C Daniel
KCP&L Greater Missouri
Operations Company
dan.gibb@snrdenton.com

Humphrey A Heather
KCP&L Greater Missouri
Operations Company
Heather.Humphrey@kcpl.com

Zobrist Karl
KCP&L Greater Missouri
Operations Company
karl.zobrist@snrdenton.com

Steiner W Roger
KCP&L Greater Missouri
Operations Company
roger.steiner@kcpl.com

Sader S Neil
Lee's Summit Medical Center
nsader@sadergarvin.com

Zakoura P James
Lee's Summit Medical Center
jim@smizak-law.com

Sader S Neil
Liberty Hospital
nsader@sadergarvin.com

Zakoura P James
Liberty Hospital
jim@smizak-law.com

Mangelsdorf B Sarah
Missouri Department of Natural
Resources
sarah.mangelsdorf@ago.mo.gov

Cooper L Dean
Missouri Gas Energy
dcooper@brydonlaw.com

Jacobs J Todd
Missouri Gas Energy
todd.jacobs@sug.com

Noack R Michael
Missouri Gas Energy
mike.noack@sug.com

/s/ Lewis R. Mills, Jr.
