

**FISCHER & DORITY**  
PROFESSIONAL CORPORATION

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June 19, 2001

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

**FILED<sup>2</sup>**  
JUN 19 2001  
Missouri Public  
Service Commission

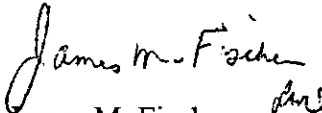
RE: Case No. EE-2001-663

Dear Mr. Roberts:

Please find enclosed for filing in the above referenced matter the original and eight (8) copies of Supplemental Pleading. Copies of this pleading have been served this date on all parties of record.

Thank you for your assistance in this matter.

Sincerely,

  
James M. Fischer

/jr

Enc:

cc: Parties of Record

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

**FILED<sup>2</sup>**

**JUN 19 2001**

**Missouri Public  
Service Commission**

In the Matter of the Application of Kansas City     )  
Power & Light Company for a Variance             )  
From the Separate Meter Requirement             )

Case No. EE-2001-663

**SUPPLEMENTAL PLEADING**

COMES NOW Kansas City Power & Light Company ("KCPL"), and, pursuant to the Order Directing Filing dated June 11, 2001 and 4 CSR 240-2.060(1) and (14), respectfully requests that the Missouri Public Service Commission ("Commission") issue an order that permits this pleading to supplement the Application filed in this case on June 4, 2001. In support of its Supplemental Pleading, KCPL states the following:

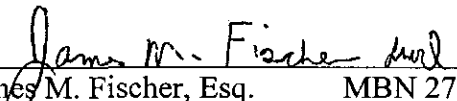
1. KCPL is a Missouri corporation in good standing in all respects, with its principal office and place of business located at 1201 Walnut, Kansas City, Missouri 64106. KCPL is engaged in the generation, transmission, distribution, and sale of electric energy and power in those areas in Missouri certificated to it by the Commission, including the City of Kansas City, Missouri, as well as areas of eastern Kansas. KCPL is an "electrical corporation" and "public utility" as those terms are defined in Section 386.020 (15) and (42), RSMo Supp. 1999, and, as such, is subject to the jurisdiction of the Commission as provided by law. KCPL's Certificate of Good Standing is attached hereto as Exhibit A.

2. KCPL has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates which has occurred within three (3) years of the date of the Application, except as identified on Exhibit B, attached hereto and incorporated herein.

**WHEREFORE**, Kansas City Power & Light Company respectfully requests that Commission issue an order that permits the instant pleading to supplement the Application that was filed in this case on June 4, 2001.

Dated this 19<sup>th</sup> day on June, 2001.

Respectfully submitted,

  
James M. Fischer, Esq. MBN 27543  
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Jefferson City, MO 65101  
Telephone: (573) 636-6758  
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and

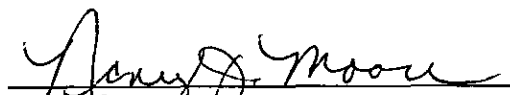
Gerald A. Reynolds KBN 00007  
Senior Regulatory Counsel  
KANSAS CITY POWER & LIGHT COMPANY  
1201 Walnut  
Kansas City, MO 64106  
Telephone: (816) 556-2785  
Facsimile: (816) 556-2787  
E-mail [gerald.reynolds@kcpl.com](mailto:gerald.reynolds@kcpl.com)

ATTORNEYS FOR KANSAS CITY  
POWER & LIGHT COMPANY

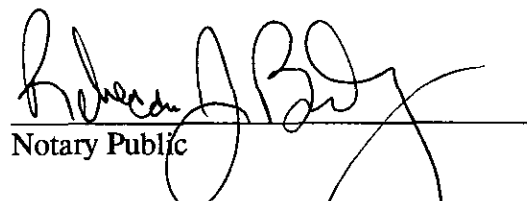
**VERIFICATION**

STATE OF MISSOURI     )  
                                  ) ss.  
COUNTY OF JACKSON    )

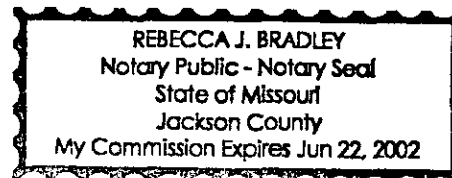
Nancy J. Moore, having been duly sworn upon her oath, states that she is Vice President for Customer Service at Kansas City Power & Light Company, and that the Application and Supplemental Pleading are true and correct to the best of his information, knowledge and belief.

  
\_\_\_\_\_  
Nancy J. Moore

Subscribed and sworn to before me this 18<sup>th</sup> day of June, 2001.

  
\_\_\_\_\_  
Notary Public

My Commission Expires: 6-22-02

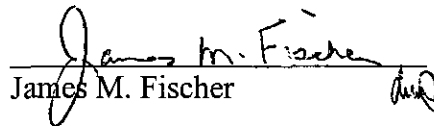


**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing Supplemental Pleading has been hand-delivered or mailed, First Class, U.S. Mail, postage prepaid this 19<sup>th</sup> day of June 2001, to:

Dana Joyce, General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

Martha Hogerty, Public Counsel  
Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, Missouri 65102

  
James M. Fischer

No. 00040080

# STATE OF MISSOURI



Matt Blunt  
Secretary of State

## CORPORATION DIVISION

### CERTIFICATE OF CORPORATE GOOD STANDING

I, MATT BLUNT, Secretary of State of the State of Missouri,  
do hereby certify that the records in my office and in my  
care and custody reveal that

KANSAS CITY POWER & LIGHT COMPANY

was incorporated under the laws of this State on the 29th  
day of JULY, 1922, and is in good standing, having fully  
complied with all requirements of this office.

IN TESTIMONY WHEREOF, I have set my  
hand and imprinted the GREAT SEAL of  
the State of Missouri, on this, the  
13th day of FEBRUARY, 2001.

*Matt Blunt*

Secretary of State



## Exhibit B

Following is a listing of KCPL's pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer services or rates, which action, judgment or decision has occurred within three (3) years of the date of this application:

1. GST Appeal of Missouri Public Service Commission Case No. ER-99-553 in the Circuit Court of Cole County, Missouri  
Docket No. 00CV325891
2. Hawthorn Station Incident Investigation before the Missouri Public Service Commission  
Case No. ES-99-581