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January 23, 2002

**FILED<sup>3</sup>**

**JAN 23 2002**

**Missouri Public  
Service Commission**

The Honorable Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102-0360

Re: Case No. ER-2001-672

Dear Judge Roberts:

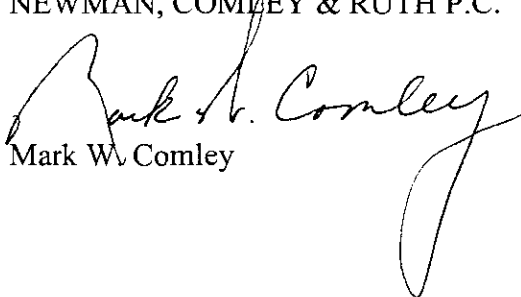
Please find enclosed for filing in the referenced matter the original and eight copies of the City of Kansas City's Statement of Position on List of Issues.

Please contact me if you have any questions regarding this filing. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:

  
Mark W. Comley

MWC:ab

Enclosure

cc: Office of Public Counsel  
General Counsel's Office  
William D. Geary  
All parties of record

**FILED<sup>3</sup>**

**JAN 23 2002**

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

**Missouri Public  
Service Commission**

In the Matter of the Tariff Filing of Missouri Public  
Service (MPS), a Division of UtiliCorp United, Inc.,  
to Implement a General Rate Increase for Retail  
Electric Service Provided to Customers in the  
Missouri Service Area of MPS.

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Case No. ER-2001-672  
Tariff No. 200101173

**CITY OF KANSAS CITY'S  
STATEMENT OF POSITION ON  
LIST OF ISSUES**

Comes now the City of Kansas City (Kansas City), by and through counsel, and supplies this statement of position on the issues submitted by the parties in this case on January 18, 2002:

**Issue 1**

- 1. Revenue requirement: What is the proper scope of the revenue requirement to be determined in this case?**

The revenue requirement in this case should take into account any savings achieved by UtiliCorp in its recent merger with St. Joseph Light & Power Company. If rates are adjusted as part of the Commission's decision, those rates should reflect a fair distribution of any merger savings that MPS' parent has achieved.

**Issues 2 - 23**

With respect to issues 2 through 23 and the subparagraphs thereof, Kansas City takes no separate position, without impairment of its right to brief and argue these issues to the Commission as the evidence unfolds at hearing.

Respectfully submitted,



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Attorneys for City of Kansas City, Missouri

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, on this 23<sup>rd</sup> day of January, 2002, to:

Stuart W. Conrad  
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1209 Penntower Office Center  
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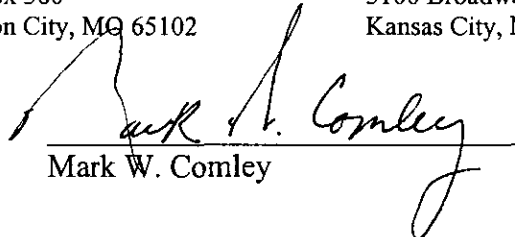
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