

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

Emma McFarlin and Rebecca Shepherd)	
)	
Complainants,)	
)	
v.)	File No. EC-2013-0024
)	
Kansas City Power & Light Company,)	
)	
Respondent.)	

ANSWER OF KANSAS CITY POWER & LIGHT COMPANY

Pursuant to the November 2, 2012 *Order Directing Filing*, Kansas City Power & Light Company (“KCP&L” or “Company”), hereby submits its answer to the Missouri Public Service Commission (“Commission”) in response to Emma McFarlin’s and Rebecca Shepherd’s complaint in this proceeding.

In support, KCP&L states as follows:

I. BACKGROUND

1. KCP&L provides electric service to Emma J. McFarlin and Rebecca J. Shepherd at 3637 Agnes Avenue, Kansas City, Missouri.
2. On July 20, 2012, Ms. McFarlin and Ms. Shepherd submitted a formal complaint to the Commission concerning disconnection of electric service.
3. Complainants request that KCP&L (i) reduce their balance; (ii) provide documentation of tampering; (iii) restore complete service to 3637 Agnes Ave. with reasonable payment plan; (iv) provide letter of apology from KCP&L and Commission.

4. On July 25, 2012, Staff filed its *Preliminary Report* recommending the complaint be dismissed as the Complainants documentation failed to support that they were disconnected for any reason other than non-payment.

5. Since submitting their formal complaint, the Complainants and KCP&L have agreed to a payment plan arrangement whereby Ms. McFarlin and Ms. Shepherd will over time pay the entire unpaid account balance to KCP&L.

II. ANSWER

6. Although KCP&L was able to work out a payment plan with the Complainants, KCP&L understands that Ms. McFarlin and Ms. Shepherd refuse to withdraw their complaint. Because the complaint is still pending, KCP&L submits its answer below.

7. KCP&L admits that it is a public utility under the jurisdiction of the Public Service Commission of the State of Missouri.

8. ** [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].**

9. ** [REDACTED]
[REDACTED]**

10. ** [REDACTED]
[REDACTED]
[REDACTED]**

11. On September 26, 2012 at Complainants request KCP&L delivered and installed an IHD (In Home Display) to monitor electric usage.

12. Except as expressly admitted in this Answer, KCP&L denies each and every other allegation contained in the complaint. Additionally, KCP&L reserves the right to supplement this pleading to add additional defenses and claims in connection with this complaint.

13. KCP&L has acted in accordance with its tariffs and the Missouri code of state regulations.

14. Complainant fails to state a claim upon which relief can be granted.

III. CONCLUSION

For the foregoing reasons, KCP&L respectfully requests that the Commission deny Complainants' request for relief. KCP&L has already restored service to Complainants and established a payment plan. Therefore, Respondent KCP&L requests that the Commission dismiss the complaint.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorney for Kansas City Power & Light
Company**

Dated November 15, 2012

Certificate of Service

I hereby certify that a true and correct copy of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record on this 15th day of November, 2012.

/s/ Roger W. Steiner

Attorney for Kansas City Power & Light
Company