

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

In the Matter of the Application of Kansas City)
Power & Light Company for Approval to Make)
Certain Changes in its Charges for Electric) Case No. ER-2010-0355
Service to Continue the Implementation)
of its Regulatory Plan.)

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for) Case No. ER-2010-0356
Approval to Make Certain Changes in its)
Charges for Electric Service.)

EMPIRE’S STATEMENT OF POSITIONS

COMES NOW The Empire District Electric Company (“Empire”), by and through counsel, and respectfully states as follows to the Missouri Public Service Commission (the “Commission”):

1. On March 15, 2010, Kansas City Power & Light Company (“KCPL”) submitted to the Commission proposed tariff sheets intended to implement a general rate increase for electrical service provided by KCPL in its Missouri service area.

2. Also on March 15, 2010, KCP&L Greater Missouri Operations Company (“GMO”) submitted to the Commission proposed tariff sheets intended to implement a general rate increase for electrical service provided by GMO in its Missouri service area.

3. In each case, the Commission issued an Order Approving Nonunanimous Stipulation and Agreement, Setting Procedural Schedule, and Clarifying Order Regarding Construction and Prudence Audit, dated August 18, 2010, directing the parties, in part, to file a Statement of Positions in each case on January 12, 2011.

4. Empire has not filed testimony in either case. Empire was a party to prior Commission cases involving KCPL and its regulatory plan, and Empire is participating in these

proceedings due to its involvement with the Iatan plants. Empire has a 12 percent ownership interest in Iatan 1 and Iatan 2 (as well as a 12 percent ownership interest in Iatan Common). KCPL is responsible for the operations at said plants, and KCPL managed the construction of Iatan 2.

5. Due to the unique nature of Empire's interest in these cases and Empire's level of involvement in these cases, at this time, Empire takes no position on the issues set forth in the issue list filed herein. Empire reserves its right, as a party to these proceedings, to assert its positions on various issues when evidence is presented to the Commission, to file post-hearing briefs, to file true-up testimony, and to otherwise fully participate in the evidentiary hearings to be held herein.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND P.C.

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered, mailed by U.S. mail, or electronically transmitted on this 12th day of January, 2011, to all parties of record.

/s/ Diana C. Carter