



Gerald A. Reynolds

(816) 556-2138
(816) 556-2787 (Facsimile)

● **FILED**

JAN 31 2000

**Missouri Public
Service Commission**

January 28, 2000

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

RE: Case No. EC-2000-330

Dear Mr. Roberts:

Enclosed for filing with the Commission in the above-referenced matter are the original and 15 copies of Kansas City Power & Light Company's Answer. Please time stamp one of the copies and return it to KCPL in the enclosed self-stamped envelope. A copy of the foregoing Answer has been mailed via overnight mail this date to parties of record.

Please bring this filing to the attention of the Commission.

Thank you for your attention to this matter.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Gerald A. Reynolds", written in a cursive style.

Gerald A. Reynolds

Enclosures

cc: Parties of Record
Office of the Public Counsel

FILED

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

JAN 31 2000

Maurice Banks,

Complainant,

v.

Kansas City Power & Light Company,

Respondent.

**Missouri Public
Service Commission**

Case No. EC-2000-330

ANSWER

COMES NOW Respondent Kansas City Power & Light Company ("KCPL"), by and through its attorneys, and makes the following response to the complaint filed in this matter:

1. KCPL lacks knowledge or sufficient information regarding Maurice Banks' residence and therefore leaves Maurice Banks to his proof.
2. KCPL admits that it is a public utility under the jurisdiction of the Public Service Commission of the State of Missouri.
3. With respect to paragraph two, KCPL admits that KCPL denied Maurice Banks' request for electric service at a commercial property. KCPL admits that Maurice Banks provided KCPL with identification, and a copy of a lease. KCPL also admits that KCPL and Maurice Banks have had several discussions regarding his request for electric service. KCPL denies the remaining allegations contained in paragraph two.
4. KCPL admits the allegations contained in paragraph three.

For its other and further Answer and defense, KCPL states and alleges the following:

5. On or about October 27, 1999, Maurice Banks contacted KCPL, and requested electric service at a commercial establishment located at 6950 Prospect Avenue, Kansas City, MO (the "Premises"). During this discussion, Maurice Banks was informed that since Ray Cartwright ("Mr. Cartwright") operates a business out of the Premises, Mr. Cartwright's past debts would have to be paid before KCPL would provide electric service to the Premises. At last count, Mr. Cartwright's unpaid debt owed to KCPL exceeds \$30,000.

6. Mr. Cartwright's history with KCPL goes back at least ten years. During this period, Mr. Cartwright has used numerous aliases¹, strawmen and business entities to receive electric service from KCPL. During this period, Mr. Cartwright, through the use of subterfuge, has obtained electric service from KCPL at various locations in the Kansas City area, including the Premises. In many cases, Mr. Cartwright failed to pay his electric bills. As of October 27, 1999, and assuming that a five-year statute of limitation governs KCPL's causes of action, Mr. Cartwright owes KCPL approximately \$13,538.27.

7. Upon information and belief, certain members of Maurice Banks' family have been involved in some Mr. Cartwright's business ventures. Vernon Banks ("Mr. Banks") has claimed that he is the owner of record of the Premises. Upon information and belief, and in his purported capacity as owner of the Premises, Mr. Banks leased the Premises to Mr. Cartwright in the past. In addition, on October 22, 1998, Mr. Banks informed KCPL that he owned a 25% interest in the business located at the Premises. At the time this discussion took place, Mr. Banks was attempting to secure electric

¹ Upon information and belief, Mr. Cartwright has used the following aliases to obtain electric service: Todd Graddine, Robbie Sutton, Ray Wright, Ray Russell, Chuck Freeman, Ray Gay, Roy Cartwright,

service at the Premises for a gentleman named Chuck Freeman. Mr. Banks claimed that Mr. Cartwright was not the owner of the business being operated at the Premises, and that Mr. Cartwright was merely helping Mr. Freeman learn the business. KCPL suspects that Chuck Freeman is one of Mr. Cartwright's aliases.

8. Upon information and belief, Maurice Banks is Mr. Banks' son.

9. There is substantial evidence that demonstrates that Mr. Cartwright would benefit from electric service if KCPL were to provide service at the Premises:

- a) The publication "It The Talk Of The Town" contains an advertisement for a restaurant operated by Mr. Cartwright out of the Premises ("Advertisement"). A copy of the Advertisement is attached hereto as Exhibit A.
- b) The Advertisement states that the name of the restaurant is "Raychef B.B.Q. and Soul Food Diner."
- c) The Advertisement lists the restaurant's address as "6950 Prospect."
- d) On or about July, 1998, telephone service for Ray's Chef Diner ((816) 822-4080) was established under the name of "Chuck Freeman." As previously noted, KCPL believes that "Chuck Freeman" is one of the aliases used by Mr. Cartwright. On or about December 22, 1999, the telephone service at the Premises was taken out of "Chuck Freeman's" name and placed in Maurice Banks' name. Please note that the telephone number listed above recently has been disconnected.
- e) KCPL employees have spoken to Mr. Cartwright via telephone at the Premises.
- f) As of November 2, 1999, Mr. Cartwright was receiving mail at the Premises.
- g) Mr. Cartwright has distributed advertisements that promote Ray Chef's Diner and list the diner's address as 6950 Prospect Street, Kansas City, MO. A copy of said advertisement is attached hereto as Exhibit B.

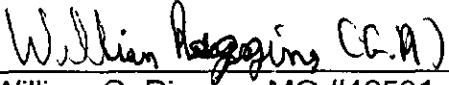
Raymond Russell, and Arthur Taylor. Please note that this list is not exhaustive.

10. The information listed above is merely a portion of the evidence that demonstrates that Mr. Cartwright would benefit from electric service if KCPL were to provide electric service to the Premises. Until Mr. Cartwright's prior debts are paid, he is not entitled to electric service at the Premises or any other location within KCPL service territory.

WHEREFORE, KCPL prays that the Commission:

- a) deny each and every claim for relief presented by the complainant and dismiss his complaint; and
- b) provide such other and further relief as the Commission may deem just.

Respectfully submitted,



William G. Riggins, MO #42501
Gerald A. Reynolds, CT #407871
1201 Walnut Street
Kansas City, MO 64106
(816) 556-2785
(816) 556-2787 (Facsimile)

Attorneys for Kansas City Power & Light Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing response was served via overnight mail on this 28th day of January, 2000, upon:

Office of the Public Counsel
P. O. Box 7800
Jefferson City, MO 65102

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

Maurice Banks
4801 East 40th Place
Kansas City, MO 64130

William G. Riggins (G.R.)
William G. Riggins

IT'S THE TALK OF THE TOWN

WHY ARE WE BOMBING KOSOVO? WHY SEND GROUND TROOPS? VETERAN'S INSIGHT FOR THE ANSWERS



80 year old, Len Bowlin, is a World War II Veteran of a Irish Decedent. He says war is an ugly matter, but ethnic cleansing is even uglier. The killing of innocent people cannot be tolerated, but there may be a greater threat that is addressed in the Kosovo Conflict as he touch on NATO's primary purpose.

Page 4

LEN BOWLIN

And other Veterans of World War II, Korea & Vietnam express their concern about the Kosovo Conflict

KANSAS CITY MULTI-NEIGHBORHOOD NEWSPAPER

Sports

with Tim McGruder

NFL DRAFT Royals Early Analysis

Students & Host
Families Sought For
Student Exchange
Program

WHY I WANT A WIFE

The Silent Killer

INSOMINA

RAYCHEF BBQ & SOUL FOOD



Pastor Williams of Star Light
Spiritual Church Talks about

Awesome Love

When You Find It, Keep
It, Don't Never Loose It...
with his wife, Kay Williams



TO PLACE AN AD CALL
(816) 822-2499

EXHIBIT A

RAYCHEF

B.B.Q & SOUL FOOD DINER



ready to serve and dine
You at Raychef BBQ &
Soul Food Diner

By Glen Scott

Nestled in the heart of the inner city is a restaurant owned by a gentleman who specializes in down-home cooking. Originating from Macon, Tennessee the gentleman stands over six feet tall, he's slender and he speaks in a relax manner where his actions are louder than his words. Though his walk is disrupted by time, he still manages to serve a platter

with poise and grace. Folks, I introduce to you the world's finest chef, **Ray Cartwright** who is formally know across the metropolitan area as **Raychef**.

Raychef has been the talk of the town for quite some time. People rave about his southern cooking of hickory smoked ribs, beef turkey, pork and goat. That's right goat. But don't forget his slammimg pigsnoots and ears with the side orders of greens, mash potatoes with corn bread. If you have a taste for B.B.Q. fish and seafood, "it's all good" says regular customers in the neighborhood. Other customers say, "Those finger lickin' Chicken wings; makes me wanta shout, "Grandma's in the house." Others are saying that Raychef's soul food is so good, "it puts their mamma's cooking to shame!" And mothers are saying, "Why cook when we can order family-size dinners and hungry jack burgers at Raychef's." Also for the deserts, Raychef provides lemon, pecan, German chocolate and other pies and cakes. You just gotta go and know it for yourself.....

What inspired Ray to be a magnificent cook was a dream. He mentioned trying to avoid the dream when he was younger, but the dream stayed with him for years no matter what he did as an occupation. Ray recalls dreaming about cooking fish. Maybe being in the kitchen so many times watching his mother had something to do with the dream being so strong. He remembers people traveling over 20 miles just to get some

skins off Barbecue she roast Sparked by his brother asking him to visit Kansas City in 1958, Young Ray took his offer. After some odd jobs, Ray findly gave into his dream. It was like De'ja'vu, his first experience in a restaurant was cooking fish on November 13, 1957. After developing his God given gift in 1987, he opened his own resatrant known to us as, Raychef B.B.Q and Soul Food Diner 25 years ago.

Ray's first restaurant was on 75th street. People as far as Olathe came to dine. Someone in Olathe gave him an offer he couldn't refuse. So he moved Raychef's operation in Olathe, Kansas. There he received 5 star Ratings from local newspapers in the city of Olathe. However, after having three years of success in Olathe, a truck accident caused Ray to stop traveling long hours to work. Now he has returned to the neighborhood where he began. People still followed him from Olathe and other parts of Kansas for a meal that is hard to duplicate.

Now reaching 60 years old, Raychef's future goal is to find a person who is willing to learn and uphold the reputation that he has built over 30 years. "In next two years, I hope to go into a semi-retirement", Ray replies. Recently, two months ago, he placed a help wanted ad in this publication. As a result, Denise Williams responded and was hired. Denise has sixteen years in the restaurant market. Ray believes she has all the traits to uphold the reputation of Raychef's. Time will tell, but right now we're a good team, rejoices Ray. She improves customer service in many ways. "We're able to service the customers quicker while maintaining quality service and product with her experience," delights Ray.

In closing, Ray likes everyone to know, "We're open seven days a week from Monday through Thursday at 10:30 AM to 11:00 PM, Friday and Saturdays we are open 10:30 AM to 2:00 AM and Sunday at 11:00 AM to 10:00 PM. Also, keep in mind, we will soon being serving Breakfast. For faster service, call in your order at 822-4080. Most of all, Raychef B.B.Q. and Soul Food Diner means **Quality Meals** that satisfies your entire family because it's been the talk of the town for years.....

"Success has a thousand fathers, but failure is an orphan."

Cutt'N Up

Barber Shop

361-1005

8109 Troost Ave.
KC, MO

Booths Available

- We provide towels
- Easy access
- Reasonable rates
- Professional setting

Designer's Port

7317 Troost • KC, MO

444-8553

Ask for "T"



Fresh Look Cleaners

Tues. & Wed. 2 pc. \$4.00
Mens & Ladies suits

3 pairs of
Starched Jeans \$8.50

Lorenzo

Stylist/Barber

6809 Prospect—KC, MO • Pager: 860-9389 • Phone: 333-7430

Back On The Block
Hair Cuts \$10
Shampoo & set \$25

Crosstown Cab Co.

When you need a cab, we're just a phone call away.
Our services are Dependable & our drivers are courteous.



Pickup in Missouri Only

[816] 241-3344



Need Extra Cash?

We Pay Cash for Antiques & Collectibles
Oriental Rugs • Dining Room Sets •
Bedroom Sets • Lamps • Toys •
Paintings • Dishes • Pottery •
Quilts & More

DARLENE'S

Antiques & Collectibles

Call 361-9901

J20170899G



SPECIALIZING IN DOWN-HOME COOKING

RAYCHEF B.B.Q.
AND
SOUL FOOD DINER

6950 PROSPECT
(816) 822-4080

HICKORY SMOKED RIBS • BEEF
TURKEY • PORK • GOAT
FRIED CHICKEN WINGS
BAR-B-QUE
FRESH FISH AND SEAFOOD

FAMILY STYLE DINNERS
BURGERS • FRIES
SANDWICHES & SALADS

DINE IN OR CARRY-OUT COUNTRY BREAKFAST

Combo Specials
Double Cheese Burger
With fries & Drink
\$5.50

10 Piece Chicken
Wings with Fries
\$5.99



OPEN 7 DAYS

