

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

Earth Island Institute d/b/a)	
Renew Missouri, et al.,)	
)	
Complainants,)	
)	
v.)	Case No. EC-2013-0380
)	
KCP&L Greater Missouri Operations)	
Company,)	
)	
Respondent.)	

**ANSWER OF
KCP&L GREATER MISSOURI OPERATIONS COMPANY**

KCP&L Greater Missouri Operations Company (“GMO or “Respondent”) hereby submits its Answer to the Missouri Public Service Commission (“Commission”) in response to Earth Island Institute d/b/a Renew Missouri, et al. (“Complainant”) Complaint in this proceeding.

In support, GMO states as follows:

ANSWER

1. References hereafter to numbered paragraphs refer to the numbered paragraphs of the Complaint filed in Case No. EC-2013-0380.
2. Respondent is without knowledge of the allegations stated in Paragraph 1 and therefore denies same.
3. Respondent is without knowledge of the allegations stated in Paragraph 2 and therefore denies same.
4. Respondent is without knowledge of the allegations stated in Paragraph 3, including Subparagraphs a through c, and therefore denies same.

5. Respondent is without knowledge of the allegations stated in Paragraph 4, including Subparagraphs a through c, and therefore denies same.

6. Respondent is without knowledge of the allegations stated in Paragraph 5 and therefore denies same.

7. Respondent admits the allegations stated in Paragraph 6.

8. Respondent is without knowledge of the allegations stated in Paragraph 7 and therefore denies same.

9. Respondent denies the allegations stated in Paragraph 8.

10. Respondent is without knowledge of the allegations in Paragraph 9, and therefore denies same.

11. Respondent is without knowledge of the allegations stated in Paragraph 10 and therefore denies same.

12. Respondent neither admits nor denies the allegations contained in Paragraph 11, as Missouri statutes speak for themselves.

13. Respondent neither admits nor denies the allegations contained in Paragraph 12, as Missouri statutes speak for themselves.

14. Respondent neither admits nor denies the allegations contained in Paragraph 13, as Missouri statutes speak for themselves.

15. Respondent neither admits nor denies the allegations contained in Paragraph 14, as Commission rules speak for themselves.

16. Respondent neither admits nor denies the allegations contained in Paragraph 15, as Commission rules speak for themselves.

17. Respondent neither admits nor denies the allegations contained in Paragraph 16, as Commission rules speak for themselves.

18. Respondent neither admits nor denies the allegations contained in Paragraph 17, as court decisions speak for themselves.

19. Respondent admits that it submitted its 2011 Renewable Energy Standard (“RES”) Compliance Report and 2012-2014 Compliance Plan. Respondent denies all other remaining allegations in Paragraph 18.

20. Regarding paragraph 19, Respondent incorporates its answers to paragraphs 1-18 of the Complaint.

21. Respondent denies the allegations stated in Paragraph 20.

22. Respondent neither admits nor denies the allegations contained in Paragraph 21, as Commission rules speak for themselves.

23. Respondent denies the allegations stated in Paragraph 22.

24. Respondent admits that the Complaint has accurately quoted a section of GMO’s RES Compliance Plan. Respondent denies all other allegations contained in Paragraph 23.

25. Respondent admits in its Report on Respondent’s RES Compliance Plan the Commission Staff recommended that the Commission grant a waiver from the requirement of 4 CSR 240-250.100(7)(B)1.F. Respondent admits that the Commission has not granted such a waiver. Respondent denies each and all of the remaining allegations in Paragraph 24.

26. Respondent neither admits nor denies the allegations contained in Paragraph 25, as Commission rules speak for themselves. Respondent is without knowledge of the allegation that the Commission has not granted a waiver of the requirement of 4 CSR 240-20.100(7)(B)1.F., and therefore denies same.

27. Respondent denies the allegations stated in Paragraph 26.

RELIEF REQUESTED

28. Respondent denies that Complainants are entitled to any of the relief requested in Paragraphs 1-3 of its prayer for relief.

AFFIRMATIVE DEFENSES

29. Except as expressly admitted in this Answer, Respondent denies each and every other allegation contained in the Complaint. Additionally, Respondent reserves the right to supplement this pleading to add additional defenses and claims in connection with this Complaint.

30. Complainants fail to state a claim upon which relief can be granted.

31. Complainants are barred by the doctrines of laches and estoppel.

32. The Commission has the authority to grant a variance or waiver of any of its rules.

CONCLUSION

WHEREFORE, having fully answered and set forth its affirmative defenses, Respondent prays the Commission deny Complainant's request for relief and dismiss the Complaint with prejudice.

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner, MBN 39586

Corporate Counsel

Kansas City Power & Light Company

1200 Main – 16th Floor

Kansas City, Missouri 64105

Telephone: (816) 556-2314

Facsimile: (816) 556-2787

E-mail: Roger.Steiner@kcpl.com

Attorney for

KCP&L Greater Missouri Operations Company

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 4th day of March, 2013.

/s/ Roger W. Steiner

Roger W. Steiner