



Gerald A. Reynolds

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FILED²

DEC 30 1999

Missouri Public
Service Commission

December 29, 1999

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 Motion for Extension of Time. Please time stamp one of the copies and return it to KCPL in the enclosed self-stamped envelope. A copy of the foregoing motion has been hand-delivered or mailed 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

KANSAS CITY POWER & LIGHT COMPANY

1201 WALNUT • P.O. BOX 418679 • KANSAS CITY, MO 64141-9679 • 816-556-2200 • WWW.KCPL.COM

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

DEC 30 1999

Missouri Public
Service Commission

Maurice Banks,)
)
Complainant,)
)
v.)
)
Kansas City Power & Light Company,)
)
Respondent.)

Case No. EC-2000-330

MOTION FOR EXTENTION OF TIME

COMES NOW Respondent, Kansas City Power & Light Company ("KCPL" or the "Company"), by and through its attorney, hereby respectfully requests that the Commission issue an order that extends the time in which KCPL has to respond to the complaint filed in this docket. In support of its motion, KCPL states the following:

1. In October of 1999, Maurice Banks ("Maurice Banks") contacted KCPL, and asked KCPL to provide him with electric service at a commercial establishment located at 6950 Prospect Avenue, Kansas City, MO (the "Premises").

2. Upon information and belief, Ray Cartwright ("Mr. Cartwright") operates a restaurant out of the Premises. KCPL suspects that Maurice Banks is seeking electric service on behalf of Mr. Cartwright. At last count, Mr. Cartwright's unpaid debt owed to KCPL exceeds \$30,000. Accordingly, KCPL has refused to provide electric service at the Premises.

3. Mr. Cartwright's history with KCPL goes back at least ten years. During

3

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 for purposes of this motion that a five-year statute of limitation governs KCPL's causes of action, Mr. Cartwright owes KCPL approximately \$13,538.27.

4. 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 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.

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

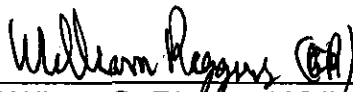
¹ Upon information and belief, Mr. Cartwright has used the following aliases to obtain electric service: Todd Graddine, Robbie Sutton, Ray Wright, Ray Russell, Chuck Freeman, Ray Gay, Roy, Cartwright,

6. Needless to say, unraveling Mr. Cartwright's aliases and business entanglements has proven to be challenging. Prior to responding to Maurice Banks' complaint, legal counsel for KCPL needs additional time to review Mr. Cartwright's file, and consult with those KCPL employee's who have dealt with Mr. Cartwright over the years. Due to the holidays, many of these employees have been unavailable.

WHEREFORE, KCPL respectfully requests that the Commission grant an extension of time up to January 31, 2000, in which to file an answer in this case.

Dated this 29th day of December, 1999.

Respectfully submitted,



William G. Riggins MO# 42501
Gerald A. Reynolds CT# 407871
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Kansas City, MO 64106
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Attorneys for Kansas City Power & Light Company

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

CERTIFICATION OF SERVICE

I hereby certify that on the 29th day of December, 1999, copies of the foregoing were sent via overnight mail, or certified mail, return receipt requested to:

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

and

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



William G. Riggins