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James M. Fischer
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December 13, 2001

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

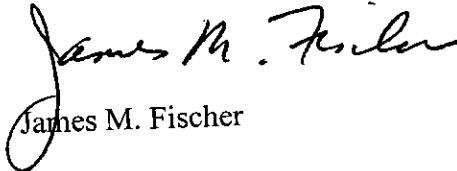
RE: *Staff v. Union Electric Company*
Case No. EC-2002-1

Dear Mr. Roberts:

Please find enclosed for filing with the Commission in the above referenced matter, an original and eight (8) copies of the Kansas City Power & Light Company's Response to the Complaint and AmerenUE's Answer.

A copy of the enclosed pleadings have been served upon each counsel of record.

Sincerely,


James M. Fischer

Enclosures

cc: Counsel of Record

FILED²
DEC 13 2001
Missouri Public
Service Commission

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

FILED²
DEC 13 2001
**Missouri Public
Service Commission**

Staff of the Missouri Public
Service Commission,

Complainant,

vs

Union Electric Company,
d/b/a AmerenUE,

Respondent.

Case No. EC-2002-1

**KANSAS CITY POWER & LIGHT COMPANY'S
RESPONSE TO THE COMPLAINT AND AMERENUE'S ANSWER**

COMES NOW Kansas City Power & Light Company (hereinafter "KCPL"), pursuant to 4 CSR 240-2.080, and to the Commission's Order Granting Intervention issued on November 19, 2001, states as follows:

1. On November 19, 2001, the Commission issued its Order Granting Intervention which granted KCPL the right to participate in this proceeding. In addition, the Order directed that KCPL and other interveners file a responsive pleading to Staff's Complaint within 30 days of the effective date of the order, admitting or denying each factual assertion or legal conclusion set out therein, and that in the event that Respondent Union Electric, doing business as AmerenUE, files a responsive pleading asserting some new matter of fact or law, the intervenors shall within 30 days file a second responsive pleading, admitting or denying each factual assertion or legal conclusion set out in Union Electric's responsive pleading. This pleading is intended to comply with the Commission's November 19, 2001 Order.

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2. In this proceeding, the Commission Staff has filed a Complaint alleging that the rates of Union Electric Company ("UE") are excessive and should be reduced. KCPL is a Missouri-jurisdictional electric utility, and may be adversely affected by ratemaking policies established in this proceeding. While KCPL intends to monitor all issues in this proceeding, it will not take an active role on many specific issues. However, since there is insufficient information currently available to identify all issues that may arise which will affect KCPL's interests, KCPL reserves its right to state its position and participate with regard to any matter or issue arising in this proceeding.

Response to Complaint

3. KCPL admits the allegations contained in the following paragraphs of the Staff's Complaint: Paragraphs 1-3, inclusive.

4. KCPL admits that the Staff has quoted portions of statutes in support of its Answer in the following paragraphs of the Staff's Complaint: Paragraphs 4-10, inclusive. KCPL takes no position regarding the applicability of these statutes to the facts of this case.

5. KCPL has insufficient information at this time to admit or deny allegations contained in the remaining paragraphs of the Staff's Complaint, including specifically the allegations contained in Paragraphs 11-21, inclusive.

Response to Answer

6. KCPL has insufficient information at this time to admit or deny the allegations contained in the twenty-eight (28) defenses of Ameren UE.

7. KCPL, however, reserves its right to state its position and fully participate with regard to any matter or issue arising in this proceeding.

WHEREFORE, having responded to the Staff's Complaint and AmerenUE's Answer, Kansas City Power & Light Company respectfully requests that the Commission takes its position into consideration as it resolves in the issues in the above-captioned matter.

Respectfully submitted,


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ATTORNEYS FOR
KANSAS CITY POWER & LIGHT COMPANY

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, postage prepaid, this 13th day of December, 2001, to:

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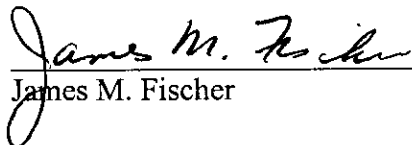
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