

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

In the matter of KCP&L Greater Missouri Operations	)	
Company for Authority to File Tariffs Changing the	)	File No. HT-2011-0343
Steam QCA for Service Provided to Customers in its	)	Tariff YH-2012-0159
Service Territory	)	

**RESPONSE OF KCP&L GREATER MISSOURI OPERATIONS COMPANY  
TO STATEMENT BY AG PROCESSING INC.**

KCP&L Greater Missouri Operations Company (“GMO” or “Company”) states the following in response to the Statement by Ag Processing Inc. filed on November 9, 2011 regarding filings made by GMO pertaining to the Quarterly Cost Adjustment Rider applicable to the Company’s steam service in St. Joseph:

1. Contrary to the suggestion of Ag Processing Inc. (“AGP”) in its Statement, the Company did serve upon AGP’s counsel, as well as his consultant Donald E. Johnstone, copies of each of the Quarterly Cost Adjustment (“QCA”) filings submitted to the Commission in April, July and October 2011. The notifications that were emailed to those individuals, as well as members of Staff and the Office of the Public Counsel are attached as Exhibit 1.

2. Any subsequent filings made by the Company simply utilized the Commission’s official service list. The Company therefore believes that it was the responsibility of AGP or any other interested party to take the normal steps required to be included on the service list. GMO will include counsel for AGP on the service list for any future filings in this proceeding.

3. The Company has no objection to AGP’s request for a period of time for its counsel and his consultant to review the filings in this matter before an order is issued by the Commission. GMO agrees that due process requires careful consideration of the Company’s proposed tariff, Staff’s recommendations, and the Company’s Response to Staff’s Informational Pleading and Suggestion filed on November 3.

4. Such consideration is particularly appropriate given that Staff's Recommendation to Reject Tariff Sheet and Direct Filing, submitted to the Commission on November 8, 2011, failed to address any of the timing and fairness issues related to the QCA process that were discussed at length by the Company in its Response of November 3, 2011.

WHEREFORE, KCP&L Greater Missouri Operations Co. requests that the Commission permit the 10<sup>th</sup> Revised Tariff Sheet No. 6.10 to go into effect and that it convene a conference to determine how any refunds resulting from the Commission's Report and Order in Ag Processing, Inc. v. KCP&L Greater Missouri Operations Co., No. HC-2010-0235, be implemented when and if such refunds become the subject of a final decision or judgment.

Respectfully submitted,

/s/ Karl Zobrist

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Attorneys for KCP&L Greater Missouri Operations  
Company

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, transmitted by facsimile or electronically emailed to all counsel of record, including counsel for Ag Processing Inc., this 10th day of November, 2011.

/s/ Lisa Gilbreath  
Attorneys for KCP&L Greater Missouri Operations  
Company