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July 3, 2002

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

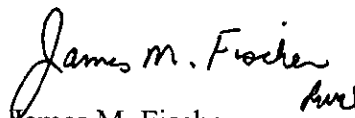
RE: *Staff v. Union Electric Company*
Case No. EC-2002-1

Dear Mr. Roberts:

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

A copy of the enclosed pleading has been served upon each counsel of record.

Sincerely,


James M. Fischer

Enclosures

cc: Counsel of Record

Staff of the Missouri Public
Service Commission,

Complainant,

vs.

Union Electric Company,
d/b/a AmerenUE,

Respondent.

Union Electric Company,)
d/b/a AmerenUE,)
)
Respondent.)

COMES NOW Kansas City Power & Light Company (hereinafter "KCPL"), pursuant to the Commission's *Order Regarding Position Statements and Marking of Exhibits* issued on July 1, 2002, and respectfully submits its Statement of Positions on the issues set forth in the List of Issues filed in this matter on June 27, 2002.

1. As stated in its Response to the Complaint and AmerenUE's Answer ("Response") filed in this matter on December 13, 2001, KCPL is a Missouri-jurisdictional electric utility, and may be adversely affected by ratemaking policies established in this proceeding. KCPL further noted in its Response that, while it intended to monitor all issues in this proceeding, it would not take an active role on many specific issues. Accordingly, KCPL has not sponsored the testimony of any witness in this proceeding and, as reflected herein, takes no position on most of the issues at this time. KCPL does support the utilization of an appropriately structured alternative regulation plan that provides benefits to all stakeholders.

KCPL concurs with the statement contained in the Proposed List of Issues, Order of Witnesses and Order of Cross-Examination, that “this ‘non-binding’ listing of issues is not to be construed as impairing any party’s ability to argue about any of these issues or related matters, or to restrict the scope of its response to arguments made by other parties.” Indeed, KCPL reserves its right to argue, brief, and fully participate with regard to any matter or issue arising in this proceeding.

Statement of Positions

KCPL takes no position at this time on the issues contained in the List of Issues submitted on June 27, 2002, except for the following:

47. UE VERSION:

Policy: In addition to “cost of service,” what policy considerations should guide the Commission in deciding this case?

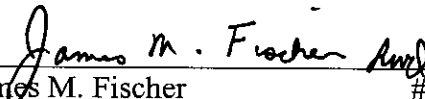
- A. Benefits of rate stability and reasonableness of UE’s current rates compared to other utilities.
- B. Financial impact on UE of Staff’s rate proposal.
- C. Implications of UE’s infrastructure investment requirements.
- D. The adequacy of the traditional regulatory model in light of changing industry and economic conditions, and its ability to provide the flexibility and incentives to facilitate increases in operational efficiency.
- E. The reasonableness of Staff’s rate of return and depreciation proposal compared to that which regulators have allowed in other jurisdictions.

47. STAFF VERSION:

UE’s Alternative Regulation Plan: Should the Commission adopt UE’s alternative regulation plan in lieu of establishing rates by traditional ratemaking principles and regulating UE on a traditional cost-of-service basis, as proposed by the Staff and Public Counsel?

KCPL Position: KCPL believes that it is critical to look beyond the traditional regulatory model, and KCPL supports appropriately structured alternative regulation plans that provide benefits to all stakeholders

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 3rd day of July, 2002, to:

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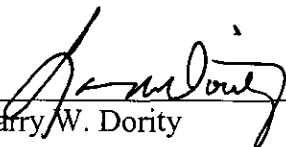
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