

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

Patricia Mincks)	
)	
Complainant,)	
)	
v.)	File No. EC-2012-0325
)	
Kansas City Power & Light Company,)	
)	
Respondent.)	

**ANSWER AND MOTION TO DISMISS OF
KCP&L GREATER MISSOURI OPERATIONS COMPANY**

Pursuant to 4 CSR 240-2.070 (6) and (8), KCP&L Greater Missouri Operations Company (“GMO” or “Company”)¹, hereby submits its answer to the Missouri Public Service Commission (“Commission”) in response to Patricia Mincks’ complaint in this proceeding.

In support, GMO states as follows:

BACKGROUND

1. GMO provides electric service to Patricia Mincks at 352 Jenna Avenue, Belton, Missouri.
2. On January 27, 2012 Complainant, Patricia Mincks was set up on the Cold Weather Rule (CWR) level payment plan.
3. On March 27, 2012 Patricia Mincks filed a formal complaint with the Commission initiating the above captioned proceeding and alleging she was coerced into an unsatisfactory budget pay arrangement.

¹ While the complaint filed in this matter designates Kansas City Power & Light as the Respondent, the complainant is, in fact, a customer of KCP&L Greater Missouri Operations Company.

4. The Commission issued its notice of complaint on April 2, 2012. Pursuant to that notice, GMO's answer is due May 2, 2012.

ANSWER

5. GMO admits that Patricia Mincks was offered the CWR level payment plan. GMO denies all other allegations contained in the Complaint.

6. On April 4, 2012 a GMO customer representative spoke with Patricia Mincks offering to set her up on the regular budget billing pay plan at a reduced amount for one year. The customer representative indicated to Ms. Mincks that her budget amount may change after one year depending on usage.

7. GMO believes that the Complainant accepted this reduced budget billing amount and that Complainant understands that the reduced budget amount could change after one year. The Company believes that Patricia Mincks is in the process of dismissing her complaint.

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

9. GMO has acted in accordance with its tariffs and the Missouri code of state regulations.

10. Complainant fails to state a claim upon which relief can be granted.

WHEREFORE, having fully answered and set forth its affirmative defenses, Respondent GMO requests that the Commission dismiss the complaint.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorney for KCP&L Greater Missouri
Operations Company**

Dated May 2, 2012

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 2nd day of May, 2012.

/s/ Roger W. Steiner

**Attorney for KCP&L Greater Missouri
Operations Company**