

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

In the Matter of the 2009 Resource Plan of)
KCP&L Greater Missouri Operations)
Company Pursuant to 4 CSR 240-22.)

File No. EE-2009-0237

**KCP&L GREATER MISSOURI OPERATIONS COMPANY'S
SUBMISSION OF ITS REVISED INTEGRATED RESOURCE ANALYSIS**

Pursuant to the Missouri Public Service Commission's ("Commission") Order Granting Extension of Time issued in this matter on December 28, 2010 ("December 28 Order"), KCP&L Greater Missouri Operations Company ("GMO" or "Company") hereby respectfully submits its revised Integrated Resource Analysis ("Revised IRP Submission") in accordance with the Non-Unanimous Stipulation & Agreement approved by the Commission on June 2, 2010. In support of its Revised IRP Submission, GMO respectfully states as follows:

1. On August 5, 2009, GMO filed its 2009 IRP which is required by the Commission's 4 CSR 240-22 Rules.
2. On April 12, 2010, the Commission Staff, the Office of the Public Counsel, Dogwood Energy, L.L.C., the Missouri Department of Natural Resources and GMO filed a Non-Unanimous Stipulation & Agreement ("Stipulation and Agreement") that contained a schedule of meetings and filings which addressed concerns and alleged deficiencies with GMO's IRP August 5, 2009 filing.
3. On June 2, 2010 the Commission issued its "Order Approving Nonunanimous Stipulation and Agreement and Accepting Integrated Resource Plan," wherein the Commission approved the Stipulation and Agreement and directed GMO to file a revised Integrated Analysis no later than December 17, 2010.

OPC
~~FILED~~ Exhibit No. GMO 405
Date 2/17/11 Reporter mls
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4. In response to GMO's unopposed motion for extension of time filed on December 17, 2010, the Commission issued the above-referenced December 28 Order extending the deadline for GMO to submit its filing until January 18, 2011.

5. GMO's Revised IRP Submission consists of the following attached documents:

- a. Volume 6 Revised Integrated Analysis
- b. Appendix A Integrated Analysis Report (HC and NP versions)
- c. Volume 8 Nontraditional Accounting
- d. EXHIBIT 1 (HC and NP versions)

As noted above, Appendix A and Exhibit 1 contain information that has been designated "Highly Confidential" and such information should be treated accordingly pursuant to 4 CSR 240-2.135.

6. As a result of this additional analysis completed per the Stipulation and Agreement in Case No. EE-2009-0237, GMO has determined that the preferred resource plan filed in August, 2009 is no longer appropriate. Significant changes have occurred in projections of both natural gas costs and CO2 emission costs along with recently proposed U.S. Environmental Protection Agency regulations, (Transport Rule) that dictates the need to fully evaluate additional alternative resource plans prior to determining a revised preferred plan. GMO will be conducting this additional analysis and expects to have results available in the summer of 2011

7. Demand-side management investment recovery remains a concern for GMO. The Company, in its current rate case, ER-2010-0356, addresses this issue and proposes a methodology to bridge the gap between the current recovery mechanism, and one the Company believes addresses all of the aspects needed for equitable recovery. In this instant

filing, GMO has included an example prepared within the frame-work of Volume 8, Section

2 of the IRP rule that it believes addresses this recovery issue. It is labeled "Volume 8: Nontraditional Accounting". Additionally, EX-2010-0368, the Commission's case regarding the implementation of the Missouri Energy Efficiency Investment Act is nearing completion. GMO needs to evaluate the result of these efforts in determining a revised preferred plan.

WHEREFORE, KCP&L Greater Missouri Operations Company respectfully submits its revised Integrated Resource Analysis.

Dated: January 18, 2011

Respectfully submitted,

/s/ Larry W. Dority

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**Attorneys for KCP&L Greater Missouri
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail, electronic mail or hand delivery, on this 18th day of January, 2011 to the parties of record.

/s/ Larry W. Dority
Larry W. Dority