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March 20, 1992

FILED

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Mr. C. Brent Stewart
Executive Secretary
Missouri Public Service Commission
Post Office Box 360
Jefferson City, Missouri 65102

PUBLIC SERVICE COMMISSION

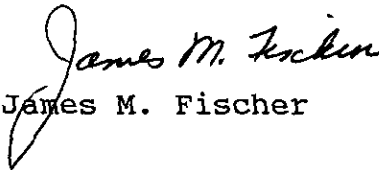
RE: Kansas Power and Light Company
Case No. GO-91-277

Dear Mr. Stewart:

Enclosed for filing in the above-referenced case is an original and fourteen (14) copies of Kansas Power and Light Company's Response to Motion and Request for Additional Time.

A copy of the foregoing document has been sent to all parties of record.

Sincerely,


James M. Fischer

JMF/jr
Enclosures

cc: Office of Public Counsel

FILED

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

MAR 20 1992

PUBLIC SERVICE COMMISSION

In the matter of the review and)
approval of cast iron main and)
unprotected steel main programs)
for The Kansas Power and Light)
Company.)

Case No. GO-91-277

RESPONSE TO MOTION AND
REQUEST FOR ADDITIONAL TIME

COMES NOW The Kansas Power and Light Company (KPL) and for its Response to Motion and Request for Additional Time in the above-entitled case, states as follows:

1. On or about March 10, 1992, the Staff of the Public Service Commission of the State of Missouri (Staff) filed its memorandum and recommendations in the above-entitled case concerning KPL's cast iron main and unprotected steel main programs. With its submission, the Staff also filed a Motion requesting that the Commission direct KPL to respond to Staff's memorandum within thirty days of its receipt by KPL.

2. Although KPL intends to respond fully to Staff's memorandum, it requests that the Commission grant an additional thirty days beyond the time period recommended by Staff for purposes of preparing and submitting that response. The additional time requested herein will enable KPL to evaluate and, where appropriate, incorporate in its response the results of the Stone and Webster safety audit as it pertains to the treatment of cast iron and bare steel mains. As the Commission knows, the Company and the Commission Staff have devoted a significant amount of time and resources over the past several years to the Stone and Webster

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audit. Since a primary purpose of that audit was to obtain a comprehensive and expert evaluation of all facets of the Company's safety program, including those aspects relating to the replacement or protection of cast iron and bare steel mains, it is important that the results of that evaluation be incorporated in KPL's response so that they may be considered by the Commission as it makes a final determination on these matters. KPL accordingly believes that it would be more productive to briefly extend the response time recommended by Staff so that the study results can be reflected in the Company's Response.

3. The additional time requested herein will not prejudice any party to this proceeding, but instead will provide the Commission with a better record upon which to make its determination in this case.

WHEREFORE, for the foregoing reasons, The Kansas Power and Light Company respectfully requests that the Commission issue an Order directing KPL to file its Response to Staff's memorandum within sixty days of its receipt by KPL.

Respectfully Submitted,

THE KANSAS POWER AND LIGHT COMPANY

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Response** was deposited in the United States mail, first class postage prepaid, this 20th day of March, 1992, to all parties of record.

James M. Fischer
James M. Fischer