

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

In the Matter of the 2015 Triennial Integrated)
Resource Plan on KCP&L Greater Missouri) Case No. EE-2014-____
Operations Company Pursuant to 4 CSR 240-22)

**APPLICATION FOR VARIANCE CONCERNING
THE 2015 TRIENNIAL INTEGRATED RESOURCE PLAN SUBMISSION OF
KCP&L GREATER MISSOURI OPERATIONS COMPANY**

Pursuant to 4 C.S.R. 240-2.060 and -22.080(13), KCP&L Greater Missouri Operations Company (“GMO” or the “Company”), hereby respectfully submits to the Missouri Public Service Commission (“Commission”) an application (“Application”) for a variance concerning certain of the Commission’s Triennial Integrated Resource Plan (“IRP”) reporting requirements, as set forth in Chapter 22 of the Commission’s regulations.

THE APPLICANT

1. GMO is a Delaware corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. GMO is primarily engaged in the business of providing electric and steam utility service in Missouri to the public in its certificated areas. GMO is an electrical corporation and public utility as defined in Section 386.020 (2000), as amended. *Id.* A Certificate of Authority for a foreign corporation to do business in the State of Missouri, evidencing the Company’s authority under the law to conduct business in the State of Missouri, was filed with the Commission in Case No. EU-2002-1053 and is incorporated herein by reference in accordance with 4 CSR 240-2.060(1)(G). GMO’s fictitious name registration was filed in Case No. EN-2009-0015 and is incorporated herein by reference.

2. GMO has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court that involves customer service or rates, which has occurred within three years of the date of this Application other than the following pending

actions: *Ag Processing, Inc. a Cooperative v. KCP&L Greater Missouri Operations Company*, Case No. HC-2012-0259. In addition, no annual report or assessment fees are overdue.

3. Pleadings, notices, orders and other correspondence and communications concerning this Application should be addressed to the undersigned counsel and:

Tim Rush
Director, Regulatory Affairs
Kansas City Power & Light Company
1200 Main Street
Kansas City, Missouri 64105
Telephone: (816) 556-2344
Facsimile: (816) 556-2110
E-mail: Tim.Rush@kcpl.com

REQUEST FOR VARIANCE

4. GMO hereby requests, pursuant to Commission Rule 4 CSR 240-22.080(13), a variance from Rule 4 CSR 240-22.045(3)(B)2 and Rule 4 CSR 240-22.045(3)(B)3 requiring Regional Transmission Organizations (RTO) expansion plan analysis specific to its Missouri customers.

5. Good cause exists for the variance request is necessary because the data required by GMO to perform the Missouri specific analysis is not available. Regional transmission plans are evaluated on utility/transmission owner costs and benefits. Results are not broken down by or identified on a state-by-state level. In Case No. EE-2013-0389, GMO requested a similar variance. In that case the Staff did not object to and the Commission approved the variance.

WHEREFORE, GMO respectfully requests that the Commission grant its Application for Variance Concerning the 2015 Triennial Integrated Resource Plan.

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner, MBN 39586
Corporate Counsel
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Attorney 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, emailed or mailed, postage prepaid, to all counsel of record in this case this 30th day of April, 2014.

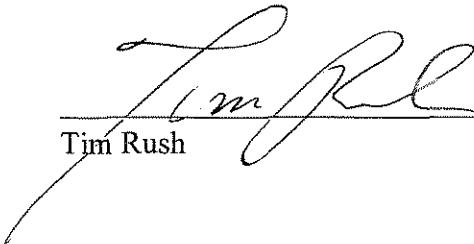
/s/ Roger W. Steiner

Roger W. Steiner

AFFIDAVIT

State of Missouri)
) ss
County of Jackson)

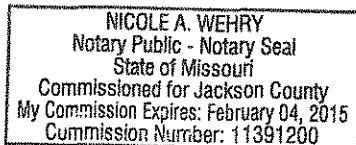
I, Tim Rush, having been duly sworn upon my oath, state that I am the Director of Regulatory Affairs of Kansas City Power & Light Company ("KCP&L"), that I am duly authorized to make this affidavit on behalf of the Applicant, and that the matters and things stated in the foregoing pleading are true and correct to the best of my information, knowledge and belief.

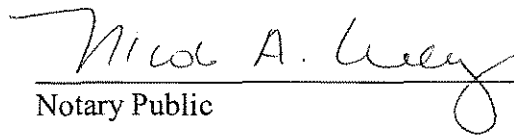


Tim Rush

Subscribed and sworn before me this 30th day of April, 2014.

My Commission Expires:





Notary Public