BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of KCP&L Greater Missouri)	
Operations Company's Renewable Energy Standard)	File No.
Compliance Plan.)	

APPLICATION FOR VARIANCE

COMES NOW KCP&L Greater Missouri Operations Company ("GMO" or "Company"), pursuant to 4 CSR 240-20.100(10) and 4 CSR 240-2.060(4), and hereby requests a variance of 4 CSR 240-20.100(7) which requires that the RES Compliance Plan be filed by April 15, and requests that the Company be granted a six (6) week extension until May 28, 2013 to file its RES Compliance Plan. In support of this application, the Company states as follows:

- 1. Missouri Public Service Commission ("Commission") rule 4 CSR 240-20.100(7) requires the filing of an Annual RES Compliance Report and a RES Compliance Plan by April 15 of each year. The RES Compliance Plan is to include a "detailed explanation of the RES retail impact limit calculated in accordance with section (5)" of the rule. 4 CSR 240-20.100(7)(B)1F.
- 2. The Company is currently in the process of preparing its 2013 Annual RES Compliance Report, and intends to file it by April 15, 2013. However, additional time is necessary to ensure that the RES Compliance Plan complies with Section 393.1030 RSMo Supp. 2009, the Commission's RES rules, and *State ex rel. Missouri Energy Development Association v. Public Service Commission*, 386 S.W.3d 165 (Mo. App. 2012).

OTHER INFORMATION

- 3. Pursuant to 4 CSR 240-2.060(1), the Company provides the following additional information. 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. A Certificate of Authority for a foreign corporation to do business in the State of Missouri, evidencing the Company's authority under 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.
- 4. GMO holds Certificates of Convenience and Necessity from the Commission to transact business as an electric public utility in certain areas of the State of Missouri and is principally engaged in the generation, transmission, distribution and sale of electric power and energy. GMO has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court that involve 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; *Earth Island Institute d/b/a Renew Missouri, et al. v. KCP&L Greater Missouri Operations Company*, Case No. EC-2013-0380. In addition, no annual report or assessment fees are overdue.

5. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

Tim Rush Director—Regulatory Affairs Kansas City Power & Light Company 1200 Main Street 19th Floor

Kansas City, Missouri 64105

Phone: (816) 556-2344 (816) 556-2110 Fax:

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WHEREFORE, GMO respectfully requests the Commission grant it a variance from the April 15th filing requirement for its RES Compliance Plan and instead allow the Company to make the filing by May 28, 2013.

Respectfully submitted,

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

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission, facsimile or email to all counsel of record on this 11th day of April 2013, to the following:

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/s/ James M. Fischer
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