

In the Matter of the 2013 Annual Update of)
KCP&L Greater Missouri Operations Company) Case No. EE-2013-____
Pursuant to 4 CSR 240-22)

Pursuant to 4 C.S.R. 240-2.060 and -22.080(13) and (15), KCP&L Greater Missouri Operations Company (“GMO” or the “Company”), hereby respectfully submits to the Missouri Public Service Commission (“Commission”) an application (“Application”) for variances concerning certain of the Commission’s 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 those terms are defined in Mo. Rev. Stat. § 386.020 (2000) and, as such, is subject to the jurisdiction of the Commission as provided by law. A Certificate of Authority for a foreign corporation to do business in the State of Missouri, evidencing GMO’s authority under the law to conduct business in the State of Missouri, was filed with the Commission in Case No. EN-2009-0164 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 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 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. 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. 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
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REQUEST FOR VARIANCES OR WAIVERS

4. On April 9, 2012, GMO submitted its compliance filing with Chapter 22 of the Commission's regulations concerning GMO's resource planning. The Commission assigned Case No. EO-2012-0324 to that proceeding.

5. On September 6, 2012, the Staff of the Commission, Office of Public Counsel, the Missouri Department of Natural Resources, and Dogwood Energy, LLC submitted reports concerning the adequacy of GMO's resource planning submissions.

6. On November 19, 2012, those parties and GMO submitted a Joint Filing that included remedies to the alleged deficiencies and concerns, as well as, a list of unresolved alleged deficiencies. In that Joint Filing, GMO also included information regarding its intention to file a three month extension request for the 2013 Annual Update Report and Workshop. Many of the resolutions included in the Joint Filing are contingent upon a three month extension. All Signatories to the Joint Filing supported GMO's planned extension request at that time.

7. GMO hereby requests, pursuant to Commission Rule 4 CSR 240-22.080(13) and (15), for a variance from Rule 4 CSR 240-22.080(3) to extend the date for the 2013 Annual Update Report and the 2013 Annual Update Workshop by three months, such that GMO will submit the 2013 Annual Update Report no less than 20 days prior to the 2013 Annual Update Workshop, which is requested to be held on or about July 1, 2013.

8. Good cause exists for the variances requested herein. GMO has engaged Navigant Consulting to conduct a Demand-Side Management (DSM) Market Potential Study which is scheduled for completion in early February 2013. The Potential Study will assess the energy efficiency and demand response potential in the residential, commercial, and industrial sectors of GMO's service area. Given the potential impact of this study on the IRP and its components, and that the specific resolutions included in the Joint Filing call for inclusion of the results of the Market Potential Study in the 2013 Annual Update, GMO requires three additional months to have adequate time to include the results in its 2013 Annual Update.

9. The variance requested herein is consistent with the policy objectives of the Commission's IRP regulations and will result in the submission of data that is more useful to the Commission and other interested parties. This variance request is only intended to apply to GMO's 2013 Annual IRP Update and its corresponding Stakeholder Workshop. If the Company

determines that waivers are necessary for subsequent IRP-related submissions, it will seek separate authorization for such waivers at that time.

WHEREFORE, GMO respectfully requests that the Commission grant its Application for Variances Concerning the 2013 Integrated Resource Plan Annual Update.

Respectfully submitted,

/s/ Roger W. Steiner

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Attorney for KCP&L Greater Missouri Operations
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 7th day of February, 2013.

/s/ Roger W. Steiner

Roger W. Steiner

AFFIDAVIT

State of Missouri)
) ss
County of Jackson)

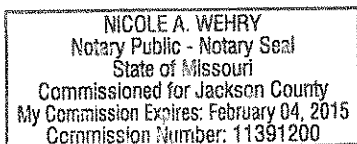
I, Tim Rush, having been duly sworn upon my oath, state that I am the Director of Regulatory Affairs of Kansas City Power & Light Company ("KCP&L"), that I am duly authorized to make this affidavit on behalf of the Applicant, and that the matters and things stated in the foregoing pleading are true and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

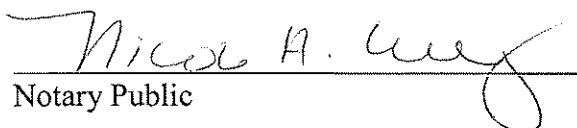


Tim Rush

Subscribed and sworn before me this 7th day of February, 2013.

My Commission Expires:





Notary Public