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March 10, 1992

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Director, Administration

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General Counsel

FILED

MAR 10 1992

Mr. Brent Stewart
Executive Secretary
Missouri Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65102

PUBLIC SERVICE COMMISSION

RE: Case No. GO-91-277 - In the matter of the review and approval of cast iron main and unprotected steel main programs for the Kansas Power and Light Company.

Dear Mr. Stewart:

Enclosed for filing in the above-captioned case is an original and fourteen (14) conformed copies of Staff's MOTION.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

William M. Shansey

William M. Shansey
Assistant General Counsel
314-751-8702

WMS:jkn

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
MAR 10 1992
PUBLIC SERVICE COMMISSION

In the matter of the review and)
approval of cast iron main and) Case No. GO-91-277
unprotected steel main programs)
for the Kansas Power and Light)
Company.)

MOTION

Comes now the Staff of the Public Service Commission of the state of Missouri ("the Staff") and for its motion states as follows:

1. Commission Rule 4 CSR 240-40.030 (15) (D), adopted by order of this Commission effective December 15, 1989, requires the operators of natural gas transportation systems in the state of Missouri having facilities which contain cast iron transmission lines, feeder lines or mains to establish and submit a replacement program to this Commission by May 1, 1990, for review and approval.

2. Commission Rule 4 CSR 240-40.030 (15) (E), adopted by order of this Commission effective December 15, 1989, requires the operators of natural gas systems in the state of Missouri having facilities which contain unprotected steel transmission lines, feeder lines and mains to establish and submit replacement/cathodic protection programs to this Commission by May 1, 1990, for review and approval.

3. In order to comply with these rules, The Kansas Power & Light Company ("KPL") submitted its programs to this Commission for review and approval.

4. On February 8, 1991, the Staff moved this Commission to establish a docket to receive KPL's cast iron main and

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unprotected steel main programs, Staff's ultimate recommendation and the Commission's review and subsequent order concerning approval.

5. On February 14, 1991, the Commission established this docket for the receipt of subsequent filings concerning the Kansas Power and Light Company's cast iron main and unprotected steel main programs.

6. On this date, March 10, 1992, the Staff has filed a detailed memorandum and recommendation concerning KPL's cast iron main and unprotected steel main programs, chronicling recent developments and changes to these programs and Staff's subsequent analysis, response and recommendation.

7. As part of its recommendation, the Staff has stated its belief that a period of thirty days should give KPL ample opportunity to respond to its recommendation and present additional information to this docket.

WHEREFORE, the Staff of the Public Service Commission moves this commission to issue its order directing KPL to respond to Staff's memorandum dated within thirty days of this memorandum's receipt by KPL.

Respectfully submitted,

William M. Shansey

William M. Shansey
Assistant General Counsel

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65102
314-751-8702

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to Mike Pendergast, William Johnson, and Hans Mertens, at Kansas Power & Light Company, 818 Kansas Avenue, Topeka, Kansas 66612; James Fischer, Akre, Wendt & Fischer, 102 East High Street, Suite 200, Jefferson City, MO 65101, on behalf of KPL; and the Office of Public Counsel, P. O. Box 7800, Jefferson City, MO 65102 this 10th day of March, 1992.

William M. Shaney