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March 27, 1992

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FILED

MAR 27 1992

PUBLIC SERVICE COMMISSION

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

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 Reply to Request for Additional Time.**

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

Enclosures

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

MAR 27 1992

PUBLIC SERVICE COMMISSION

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

STAFF'S REPLY TO REQUEST FOR ADDITIONAL TIME

COMES now the Staff of the Public Service Commission of the State of Missouri (the Staff) and for its reply to the Request for Additional Time filed by The Kansas Power and Light Company (KPL) filed in the above-styled cause, states as follows:

1. On March 10, 1992, the Staff filed a detailed memorandum and recommendation concerning KPL's cast iron main and unprotected steel main programs. As part of its recommendation, the Staff stated its belief that a period of thirty days would give KPL ample opportunity to respond to the recommendation. The Staff filed a motion in conjunction with this recommendation requesting that the Commission issue an order directing KPL to respond to Staff's memorandum and recommendation within thirty days of its receipt by KPL.

2. On March 20, 1992, KPL filed its Response to Motion and Request for Additional Time. It requested the Commission to issue its order directing KPL to file its response to Staff's memorandum within sixty days of its receipt by KPL. This would allow KPL to incorporate into its response the results of the Stone and Webster safety audit as it pertains to the treatment of cast iron and bare steel mains.

1.

X

3. On May 1, 1990, nearly two years ago, KPL submitted its replacement programs required by Section (15) of Commission Rule 4 CSR 240-40.030. In that submission, KPL indicated that the submission of its plan should be deferred until the Stone and Webster report was accepted.

4. In the Staff's response to this submission on October 23, 1990, the Staff stated that it disagreed with the proposal of waiting until the Stone and Webster report was completed, stating that even without this report KPL should be able to identify numerous high priority pipelines that would be required to be replaced by this rule. At that time, the Stone and Webster report was scheduled for completion sometime in mid to late 1991.

5. As stated in its March 10, 1992 memorandum, the Staff has noted that accelerated replacements of cast iron mains did not occur in 1991.

6. As shown by the above, KPL has successfully delayed the submission of its plan beyond what even it suggested in May of 1990. The Staff, therefore, is not inclined to support any further delay in the complete filing of the company's programs, and requests this Commission to order KPL to respond within the thirty days originally requested.

7. As an alternative to the above, the Staff suggests that the Commission may consider ordering KPL to respond to the Staff's memorandum within thirty days of the issuance of the Commission's order provided that such order be issued immediately.

WHEREFORE, the Staff of the Public Service Commission of the state of Missouri respectfully requests this Commission to issue its order requiring KPL to respond to Staff's memorandum and recommendations of March 10, 1992, within thirty days of KPL's receipt of said memorandum and recommendations, or, in the alternative, that the Commission direct KPL to respond to Staff's memorandum within thirty days of the issuance of the order.

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 all counsel of record as shown on the attached service list this 27th day of March, 1992.

William M. Shansey

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CASE NO. GO-91-277

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