

BEFORE THE PUBLIC SERVICE COMMISSION
FOR THE STATE OF MISSOURI

In the Matter of KCP&L Greater Missouri Operations)	
Company for Authority to Implement Rate Adjustments)	
Required by 4 CSR 240-20.090(4) and the Company's)	Case No. EO-2008-0216
Approved Fuel and Purchased Power Cost Recovery)	
Mechanism.)	

MOTION FOR LEAVE TO FILE PROPOSED FINDINGS OF FACT

KCP&L Greater Missouri Operations Company ('GMO' or 'Company'), pursuant to 4 CSR 240-2.080, moves for leave to file proposed findings of fact in this proceeding.

In support of this Motion, GMO states as follows:

1. The procedural schedule, proposed by the parties and adopted by the Commission on January 24, 2011, provided that the parties would file Initial Post-hearing Briefs on June 3, 2011 and Final Briefs on June 17, 2011. The procedural schedule did not call for the filing of proposed findings of fact.

2. On June 17, 2011, the Industrial Intervenors filed Proposed Findings of Fact.

3. On June 20, 2011, GMO filed a Motion to Strike Or, In The Alternative, To File Proposed Findings of Fact. In that Motion to Strike, GMO requested that the Commission strike the Industrial Intervenors' Proposed Findings of Fact because the procedural schedule did not call for the filing of proposed findings of fact and because no other party has had the opportunity to file proposed findings of fact.

4. If the Commission does not sustain GMO's June 20 Motion to Strike, GMO here requests that the Commission grant GMO and the other parties leave to file proposed findings of fact. Attached hereto as **Exhibit 1** and incorporated by reference is GMO's Proposed Findings of Fact.

WHEREFORE, the Company requests that the Commission grant the parties to this proceeding leave to file proposed findings of fact.

Respectfully submitted,

/s/ Lisa A. Gilbreath

Karl Zobrist, MBN 28325
Lisa A. Gilbreath, MBN 62271
SNR Denton US LLP
4520 Main Street, Suite 1100
Kansas City, MO 64111
Telephone: (816) 460-2400
Fax: (816) 531-7545
karl.zobrist@snrdenton.com
lisa.gilbreath@snrdenton.com

James M. Fischer, MBN 27543
Fischer & Dority, PC
101 Madison, Suite 400
Jefferson City, MO 65101
Telephone: (573) 636-6758
Fax: (573) 636-0383
jfisherpc@aol.com

Roger W. Steiner, MBN 39586
Corporate Counsel
Kansas City Power & Light Company
1200 Main Street
Kansas City, MO 64105
Telephone: (816) 556-2314
roger.steiner@kcpl.com

ATTORNEYS FOR KCP&L GREATER
MISSOURI OPERATIONS COMPANY

Certificate of Service

I hereby certify that on this 11th day of July, 2011 copies of the foregoing have been mailed, transmitted by facsimile, or emailed to all counsel of record.

/s/ Lisa A. Gilbreath

Attorney for KCP&L Greater Missouri Operations
Company