

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of)	
Kansas City Power & Light Company)	Case No.
For a Variance from Certain Regulations)	
Pertaining to Net Metering)	

**APPLICATION OF KANSAS CITY POWER & LIGHT COMPANY
FOR A WAIVER OR VARIANCE CONCERNING NET METERING REGULATIONS**

Pursuant to 4 C.S.R. 240-20.065 and 240-2.060, Kansas City Power & Light Company ("KCPL") hereby respectfully submits to the Missouri Public Service Commission ("Commission") an application ("Application") for a waiver or variance from the Commission's currently existing net metering regulations, *i.e.*, 4 CSR 240-20.065. Good cause exists for such a waiver or variance to hasten KCPL's implementation of the Net Metering and Easy Connection Act. In support of its Application, KCPL offers as follows:

1. KCPL is a Missouri corporation with its principal office and place of business at 1201 Walnut, Kansas City, Missouri 64106-2124. KCPL is primarily engaged in the business of generating, transmitting, distributing, and selling electric energy in portions of eastern Kansas and western Missouri. KCPL is an electrical corporation and public utility as defined in Mo. Rev. Stat. § 386.020 (2000). KCPL provided its Certificate of Good Standing in Case No. EF-2002-315. It is incorporated herein by reference.

2. KCPL 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. KCPL 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 those listed in Exhibit A. 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 M. Rush
Director Regulatory Affairs
Kansas City Power & Light Company
1201 Walnut – 13th Floor
Kansas City, Missouri 64106
Phone: (816) 556-2344
Fax: (816) 556-2110
E-mail: Tim.Rush@kcpl.com

4. The Net Metering and Easy Connection Act became effective January 1, 2008. KCPL currently has a net metering tariff on file with the Commission. However, the tariff was established under the Commission's currently existing regulations and does not comply with the new law.

5. Concurrent with this filing, KCPL is filing tariff sheets to amend its electric tariff sheets, specifically PSC. Mo. No. 7, Sheet Nos. 34, 34A, 34B, 34C, 34D, 34E, 34F, 40, 40A, 40B, and TOC-1. The purpose of these tariff changes is to hasten KCPL's implementation of the Net Metering and Easy Connection Act. The Commission's regulations have not yet been updated to reflect the requirements of the Net Metering and Easy Connection Act. KCPL respectfully requests a waiver or variance from the currently effective version of 4 CSR 240-20.065. KCPL understands that the Commission will revise 4 CSR 240-20.065 to conform to the Net Metering and Easy Connection Act. To the extent KCPL's net metering tariffs do not comply with the regulations ultimately promulgated by the Commission, KCPL will either seek to amend its tariffs to comply with the regulations or apply for a separate waiver or variance.

6. Good cause exists for a waiver or variance from the currently effective version of 4 CSR 240-20.065 because such action will hasten KCPL's implementation of the Net Metering and Easy Connection Act. Pursuant to 4 C.S.R. 240-2.060(4)(C), KCPL states that no other regulated public utility other than KCPL will be affected by the variance or waiver requested herein.

As set forth herein, KCPL respectfully requests a waiver or variance from any provision of 4 CSR 240-20.065 that the Commission deems necessary to accept the net metering tariff sheets KCPL is submitting contemporaneously with this application.

Respectfully submitted,



Curtis D. Blanc (Mo. Bar No. 58052)
Kansas City Power & Light Company
1201 Walnut – 20th Floor
Kansas City, Missouri 64106
Telephone: (816) 556-2483
Facsimile: (819) 556-2787
Email: Curtis.Blanc@kcpl.com

**COUNSEL FOR
KANSAS CITY POWER & LIGHT COMPANY**

Dated: February 11, 2008

EXHIBIT A

The following is a listing of KCPL's pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this application:

Zimmerman, Adam v. Kansas City Power & Light Co., MPSC Case No. EC-2008-0195.

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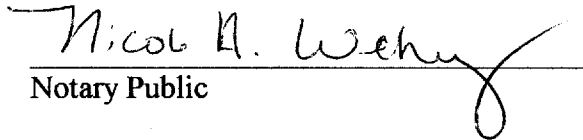
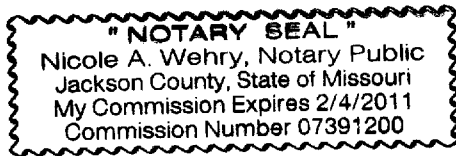
State of Missouri)
) ss
County of Jackson)

I, Chris B. Giles, having been duly sworn upon my oath, state that I am the Vice President, Regulatory Affairs of Kansas City Power & Light Company ("KCPL"), that I am duly authorized to make this affidavit on behalf of KCPL, and that the matters and things stated in the foregoing application and appendices thereto are true and correct to the best of my information, knowledge and belief.



Chris B. Giles

Subscribed and sworn before me this 7th day of February 2008.


Notary Public

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application was served either by electronic mail or by first class mail, postage prepaid, on this 11th day of February 2008, upon:

Kevin Thompson
Missouri Public Service Commission
P.O. Box 360
200 Madison St., Suite 800
Jefferson City, MO 65102

Lewis Mills
Office of the Public Counsel
P.O. Box 2230
200 Madison St., Suite 650
Jefferson City, MO 65102

A handwritten signature in black ink, appearing to read "C.D. Blanc", written over a horizontal line.

Curtis D. Blanc