BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the 2008 Resource Plan of Kansas City Power & Light Company Pursuant to 4 CSR 240-22	)))	Case No. EO-2007-_____

APPLICATION FOR WAIVERS CONCERNING
KANSAS CITY POWER & LIGHT COMPANY'S AUGUST 2008
INTEGRATED RESOURCE PLAN SUBMISSION

Pursuant to 4 C.S.R. 240-2.060 and -22.080(11), Kansas City Power & Light Company ("KCPL") hereby respectfully submits to the Missouri Public Service Commission ("Commission") an application ("Application") for waivers concerning certain of the Commission's Electric Utility Resource Planning ("IRP") reporting requirements, as set forth in Chapter 22 of the Commission's regulations. Good cause exists for such waivers. 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
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4. On July 5, 2006, KCPL submitted its compliance filing with Chapter 22 of the Commission's regulations concerning KCPL's resource planning. The Commission assigned Case No. EO-2007-0008 to that proceeding. KCPL also sought certain waivers and extensions of time concerning certain filing requirements. On November 15, 2006, Staff submitted its report concerning the adequacy of KCPL's July 5 compliance submission and related application. Staff's report alleged certain deficiencies in KCPL's compliance filing.

5. On February 13, 2007, after extensive negotiations, KCPL, Staff, the Office of Public Counsel ("OPC"), and the Missouri Department of Natural Resources ("MDNR") submitted a Stipulation and Agreement that resolved all of the alleged deficiencies in KCPL's July 5 submission. The Commission approved the Stipulation and Agreement by order issued April 12, 2007.

6. KCPL must submit its next IRP submission by August 5, 2008. In the Stipulation and Agreement, KCPL agreed to make a good faith effort to request any waivers relevant to that submission at least 12 months prior to the filing. In fulfillment of that obligation, KCPL hereby requests the waivers requested in Attachment A concerning load analysis and forecasting (4 CSR

240-22.030); Attachment B concerning supply-side resource analysis (4 CSR 240-22.040); and Attachment C concerning demand-side resource analysis (4 CSR 240-22.050). KCPL does not anticipate seeking any waivers related to integrated resource analysis (4 CSR 240-22.060) and risk analysis and strategy selection (4 CSR 240-22.070). KCPL will promptly notify the Commission if that expectation changes.

7. Good cause exists for the waivers requested herein. The information that KCPL will provide in August of 2008, consistent with the granting of the waivers sought herein, will at a minimum meet the objectives contemplated in the rule. Many of the waivers sought will in fact allow KCPL to use improved information and methodologies not available at the time the rule was enacted. Granting these waivers will improve KCPL's planning efforts and ultimately lead to a IRP submission that is more useful to the Commission and other interested parties. Moreover, as part of the collaborative process contemplated in the Stipulation and Agreement, KCPL presented the requested waivers to Staff, OPC and MDNR and undertook best efforts to address any comments or concerns they had. KCPL appreciates their participation and input.

8. For the foregoing reasons, KCPL respectfully requests that the Commission waive certain of its IRP requirements for KCPL's August 2008 submission, as set forth in Attachments A, B and C hereto. Such waivers are 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.

Respectfully submitted,

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COUNSEL FOR
KANSAS CITY POWER & LIGHT COMPANY

Dated: August 3, 2007

AFFIDAVIT

State of Missouri)
) **ss**
County of Jackson)

I, Tim M. Rush, having been duly sworn upon my oath, state that I am the Director, 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.

Tim M. Rush

Subscribed and sworn before me this 3rd day of August 2007.

Notary Public

" NOTARY SEAL "
Nicole A. Wehry, Notary Public
Jackson County, State of Missouri
My Commission Expires 2/4/2011
Commission Number 07391200

IN RE: KANSAS CITY POWER & LIGHT COMPANY'S 2008 UTILITY RESOURCE FILING PURSUANT TO 4 CSR 240, CHAPTER 22

ATTACHMENT A
WAIVER REQUESTS RELATED TO:
LOAD ANALYSIS AND FORECASTING
4 CSR 240-22.030

(1) 4 CSR 240.22.030 (1.D.1)

Current Requirement: The development of actual and weather-normalized monthly class and system energy usage and actual hourly net system loads shall start from January 1982 or for the period of time used as the basis of the utility's forecast, whichever is longer.

Proposed Alternative: The development of actual and weather-normalized monthly class and system energy usage shall start from January 1990. Actual hourly net system loads shall start from January 1982.

Rationale: Historic monthly and class system energy usage prior to 1990 is not available, and therefore KCPL cannot provide that data. For the purposes of this requirement, we believe that the current usage data, spanning 17 years, is appropriate for forecasting. This data provides more than 200 monthly observations, which is sufficient to obtain statistically significant calibration coefficients in our models.

(2) 4 CSR 240.22.030 (1.D.2)

Current Requirement: Estimated actual and weather-normalized class and system monthly demands at the time of the system peak and weather normalized hourly system loads shall start from January 1990 or for the period of time used as the basis of the utility's forecast of these loads, whichever is longer.

Proposed Alternative: Estimated actual and weather-normalized class and system monthly demands at the time of the system peak and weather normalized hourly system loads shall start from January 2005.

Rationale: Historical monthly class coincident demands (weather normalized) back to 1990 are not available. KCPL, with the involvement of Missouri Staff, designed and implemented an improved load research sample beginning in April of 2004 that utilized a structure that matches our tariff rate classes. As a result, data prior to April 2004 cannot be readily combined with the new sample data. KCPL believes that the current load research sample provides data appropriate for the proper forecasting of loads.

(3) 4 CSR 240.22.030 (3)

Current Requirement: Analysis of Use per Unit. For each major class, the utility shall analyze historical use per unit by end-use.

Proposed Alternative: For each major class, KCPL will analyze historical use per unit for heating, cooling and other end uses. For the residential class, other end uses will be appliance specific.

Rationale: The three end uses and the residential appliance data specified above are the only data available. This data is used in the SAE model to evaluate end use. KCPL conducts an appliance saturation survey for its residential customers, which allows analysis of use per unit for that class. For commercial and industrial classes, KCPL relies on regional end-use data collected by the US Department of Energy (DOE), which does not include an accurate means of disaggregation by end-use. KCPL believes that the DOE provides the best available end-use data for forecasting its loads because it maintains the best available models for incorporating appliance efficiency standards and trends in building design efficiencies, updates its models annually, and performs extensive research on energy utilization. In the future KCPL will consider performing additional market studies to help calibrate the regional data.

(4) 4 CSR 240.22.030 (3.B.1)

Current Requirement: Measures of the stock of energy-using capital goods. For each major class and end-use, the utility shall implement a procedure to develop and maintain survey data on the energy-related characteristics of the building, appliance, and equipment stock including saturation levels, efficiency levels, and sizes where applicable. The utility shall update these surveys before each scheduled filing pursuant to 4 CSR 240-22.080.

Proposed Alternative: With the exception of residential appliance saturations, KCPL requests a waiver from this requirement.

Rationale: KCPL believes that the DOE provides the best available end-use data for forecasting its loads because it maintains the best available models for incorporating appliance efficiency standards and trends in building design efficiencies, updates its models annually, and performs extensive research on energy utilization. DOE data is provided on a regional basis. The West North Central region includes Missouri, Kansas, Iowa, Nebraska, Minnesota, South Dakota, and North Dakota. Surveys conducted by DOE are completed in three parts, the Manufacturing Energy Consumption Survey (MECS) collects data on energy consumption and expenditures, onsite generation of electricity, and byproduct energy use, the Residential Energy Consumption Survey (RECS) which measures the physical characteristics of housing units, the number of appliances, the types of space conditioning equipment used, and demographic characteristics, and the Commercial Buildings Energy Consumption Survey (CBECS) which collects data on energy related building characteristics, and equipment stocks. The sample sizes in each survey are sufficient to provide estimates at the regional level. KCPL believes the use of this data for its Missouri and Kansas service areas is reasonable, useful, and appropriate for load analysis and forecasting. The level of detail provided by DOE is adequate and effective for use in the SAE model, which KCPL utilizes to evaluate the data. Given that alternate sources like EPRI's REEPS,

COMMEND and INFORM are no longer maintained and do not incorporate recent appliance efficiency standards, individual studies are cost prohibitive to produce, and our belief that the DOE survey results are comparable to those we might obtain through our own efforts, the DOE provides our most reasonable source for end use data.

(5) 4 CSR 240.22.030 (3.B.2)

Current Requirement: Estimates of end-use energy and demand. For each end-use, the utility shall estimate end-use monthly energies and demands at time of the monthly system peaks and shall calibrate these energies and demands to equal the weather-normalized monthly energies and demands at the time of monthly peaks for each major class for the most recently available data.

Proposed Alternative: For each major end-use, defined as heating, cooling and other, KCPL will estimate end-use monthly energies and demands at time of the monthly system peaks and shall calibrate these energies and demands to equal the weather-normalized monthly energies and demands at the time of monthly peaks for each major class for the most recently available data.

Rationale: KCPL's forecasting models buildup an end-use forecast for heating, cooling and other end uses, which are then calibrated to monthly sales data using a statistically adjusted end-use (SAE) approach.

In the residential sector, the end-use forecast is constructed from projections of appliance stocks, unit energy consumptions, appliance standards and building characteristics. The other end use is the sum of end-use projections for electric water heaters, clothes dryers, clothes washers, dishwashers, ovens, cooktops, refrigerators, freezers and lighting. KCPL uses its own measures of appliance ownership from its residential appliance saturation survey. These end-use projections capture expected trends in appliance ownership and efficiency.

In the commercial and industrial sectors, the end-use projections for heating, cooling and other end uses are constructed from DOE's estimates of end-use floor space shares, end-use energy use per square foot and efficiency trends for appliances and buildings. The other end use is the sum of energy use for lighting, office equipment, refrigeration equipment, cooking equipment, electric water heating and miscellaneous equipment. KCPL measures electric space heating saturations as the percentage of customers on an electric space heating rate and projects penetrations and conversions based on energy price forecasts.

The SAE model calibrates the three end uses, heating, cooling and other, to KCPL's monthly kwh sales data.

(6) 4 CSR 240.22.030 (4.A)

Current Requirement: Load profiles for each day type shall be developed for each end-use, for each major class and for the net system load.

Proposed Alternative: Load profiles for each day type shall be developed for each major end use, for each major class and for the net system load, where major end use is defined as heating, cooling and other.

Rationale: KCPL's forecasting models buildup an end-use forecast for heating, cooling and other end uses, which are then calibrated to monthly sales data using a statistically adjusted end-use (SAE) approach. Please see item #5 for details concerning the buildup process. Load profiles are then required for these major calibrated end uses to forecast hourly loads and peaks.

(7) 4 CSR 240.22.030 (4.B)

Current Requirement: For each day type, the estimated end-use load profiles shall be calibrated to sum to the estimated major class load profiles and the estimated major class load profiles shall be calibrated to sum to the net system load profiles.

Proposed Alternative: The estimated major class load profiles shall be calibrated to sum to the net system load profiles.

Rationale: KCPL's forecasting models buildup an end-use forecast for heating, cooling and other end uses, which are then calibrated to monthly sales data using a statistically adjusted end-use (SAE) approach. Please see item #5 for details concerning the buildup process. Load profiles are required for these major end uses to forecast hourly loads and peaks.

(8) 4 CSR 240.22.030 (5.B.2.B)

Current Requirement: End-use detail. For each major class and for each end-use, the utility shall forecast both monthly energy use and demands at time of the summer and winter system peaks.

Proposed Alternative: End-use detail. For each major class and for each major end use, the utility shall forecast both monthly energy use and demands at time of the summer and winter system peaks. Major end uses are defined as heating, cooling and other.

Rationale: KCPL's forecasting models buildup an end-use forecast for heating, cooling and other end uses, which are then calibrated to monthly sales data using a statistically adjusted end-use (SAE) approach. Please see item #5 for details concerning the buildup process. These forecasts by major end-use then feed our forecasts of hourly loads and peak demands.

(9) 4 CSR 240.22.030 (8.B.2)

Current Requirement: The plots for the forecast period shall show each end-use component of major class coincident demands per unit and total class coincident demands for the base-case forecast.

Proposed Alternative: The plots for the forecast period shall show each major end-use component of major class coincident demands per unit and total class coincident demands for the base-case forecast. Major end-use is defined as heating, cooling and other.

Rationale: KCPL's forecasting models buildup an end-use forecast for heating, cooling and other end uses, which are then calibrated to monthly sales data using a statistically adjusted end-use (SAE) approach. Please see item #5 for details concerning the buildup process.

(10) 4 CSR 240.22.030 (8.E.1)

Current Requirement: The plots shall show each end-use component of the hourly load profile.

Proposed Alternative: The plots shall show each major end-use component of the hourly load profile. Major end use is defined as heating, cooling and other.

Rationale: KCPL's forecasting models buildup an end-use forecast for heating, cooling and other end uses, which are then calibrated to monthly sales data using a statistically adjusted end-use (SAE) approach. Please see item #5 for details concerning the buildup process.

ATTACHMENT B
WAIVER REQUESTS RELATED TO
SUPPLY SIDE RESOURCE ANALYSIS
4 CSR 240-22.040

(11) 4 CSR 240. 22.040 (8.A) and (8.D.2)

Current Requirement: Fuel price forecasts shall be obtained from a consulting firm with specific expertise in detailed fuel supply and price analysis and each forecast shall consider several specific factors. The utility shall consider the accuracy of previous forecasts as an important criterion in selecting providers of fuel price forecasts. The provider of each forecast shall be required to identify critical factors that drive the commodity price forecast, a range of forecasts and an associated subjective probability distribution that reflects that uncertainty.

Proposed Alternative: KCPL will develop consensus price forecasts for fuel and emission allowance commodities. The various commodity price forecasts used in the consensus price forecasts shall be obtained from independent consulting firms and/or government agencies that have expert knowledge and experience with the commodity under consideration. KCPL will use the set of commodity price forecasts to develop probability distributions for each.

Rationale: In evaluating the accuracy of forecasts to comply with the requirement summarized above, KCPL has determined that of the various forecasts it has reviewed, no one forecast provider always outperforms all others. On the other hand, the combination or consensus of those various forecasts consistently is more accurate than most of the forecasts that it represents. In any one year, some forecasting services will do better than the consensus in terms of predicting the correct outcome, these 'top performers' will vary from year to year and are very difficult to identify in advance. This is consistent with academic research showing that forecast combinations have been found in empirical studies to produce better forecasts on average than methods based on the ex-ante best individual forecasting model[1]. Moreover, research such as that conducted by Huiyu Huang and Tae-Hwy Lee of University of California, Riverside's Department of Economics and reported in a January 2007 paper, "To Combine Forecasts or to Combine Information?" that combining forecasts is better than schemes that combine information[2].

Using a combined or consensus forecast makes it difficult if not impossible to identify the critical factors that drive a consensus forecast. KCPL will however, identify those fundamental factors it believes are critical to the forecast.

[1] See Allan Timmermann of University of California, San Diego's paper, "Forecast Combinations" at http://rady.ucsd.edu/faculty/directory/timmermann/docs/forecast-combinations.pdf
[2] See http://www.economics.ucr.edu/papers/papers07/07-02.pdf

ATTACHMENT C
WAIVER REQUESTS RELATED TO
DEMAND-SIDE RESOURCE ANALYSIS
4 CSR 240-22.050

BACKGROUND

In its entirety, 22.050 (2) discusses the calculation of avoided cost associated with Demand Side Resources (DSR). KCPL has addressed this resource through a portfolio of Demand Side Management (DSM) programs. 22.050 (3) utilizes the results of 22.050 (2) for the purpose of screening and ranking alternative DSM programs. The purpose for ranking programs is to ensure that the utility includes those programs that pass the various screening tests in subsequent Integrated Analysis evaluations.

KCPL intends to carry a portfolio of DSM programs into Integrated Analysis. Preliminary tests from a third party consultant, Summit Blue, indicate that all proposed programs pass the required screening tests. Therefore, KCPL does not expect the efforts required by 22.050 (2) and 22.050 (3) to exclude any of the proposed programs, and therefore the results of sections (2) and (3) will provide little benefit other than to demonstrate a ranking of programs.

KCPL will pursue the avoided costs, prescreening and ranking efforts required by these two rules; however, will seek waivers from various specific requirements of the two rules.

(12) 4 CSR 240.22.050 (2) (C) 2.

Current Requirement: The utility shall calculate and document the avoided capacity costs per kW-year for each year of the planning horizon. The calculation shall include the cost of any new generation, transmission and distribution facilities that are delayed [by at least one (1) year] or avoided because of the specified load decrement.

Proposed Alternative: KCPL will utilize the levelized annual cost of a peaking unit as the avoided "capacity" value of DSM programs.

Rationale: As written, the rule appears to contain conflicting instructions for assigning avoided "capacity" values as shown below (emphasis added):

(2)(C)2.B: "...(the utility)...shall allocate a nonzero portion of the annualized avoided capacity cost to each of the (avoided cost) periods in which capacity was utilized".

(2)(D)1: "Demand period avoided demand costs...shall include the smaller of avoided generation capacity costs or avoided capacity cost of peaking capacity".

(2)(D)3: "The avoided demand cost for Non-demand periods shall be zero".

An example of the conflict is shown below:

> Residential Compact Fluorescent Lights primarily reduce off-peak energy. Following the IRP rules, the avoided capacity value could be:

1. $0/KW-Yr [per rule (2) (D) 3],
2. $270/kW-Yr, the levelized capacity cost of base load generation at use during the specified time period [per rule (2) (C) 2 B], or
3. $70/kW-Yr, the smaller value of the avoided resource or peaking generation [per rule 2 (D)].

Due to the potential conflicts within the rule, KCPL will utilize the levelized value (in $/kW-Yr) for a peak generating resource. KCPL believes this may be a conservative estimate of the avoided "capcacity" cost; however, preliminary results show that using this value does not exclude any of the programs currently under consideration. The purpose of the avoided cost evaluations and subsequent screening are to ensure that programs passing the screening test are included in Integrated Analysis (4 CSR 22.060). Use of this value shows that all programs under consideration will be included in Integrated Analysis. Therefore, no programs are eliminated by applying the proposed value.

(13) 4 CSR 240-22.050 (3)

Current Requirement: Section 22.050 (3) specifies in its entirety the methodology for the cost-effectiveness screening of end-use measures using the probable environmental benefit test.

Proposed Alternative: KCPL will use the software package, DSMore, which was developed by Integral Analytics specifically for the evaluation of end-use energy efficiency measures.

DSMore provides all the standard energy efficiency cost effectiveness tests including the participant test, the utility test, the ratepayer impact test, the total resource test, societal test, plus a long run option value test. We propose to use the Societal Benefits Test for initial end-use measure screening.

Rationale: DSMore provides KCPL with a number of features that comply with these rules and improve the quality of the data. KCPL will model each measure using DSMore and will utilize the following inputs to model the program portfolio:

Utility input data

1. KCP&L's utility discount rate.
2. The levelized avoided demand (capacity) cost.
3. The avoided energy costs will be defined as a log-logistic statistical distribution of historical hourly wholesale market prices.
4. KCP&L generation cost escalation factor.
5. KCP&L levelized avoided T&D cost.

6. KCP&L T&D line loss as a percent of delivered energy.
7. KCP&L's annual incentive payments
8. KCP&L's annual program administration expense which will include annual operation and maintenance, if applicable.
9. KCP&L avoided ancillary services cost (e.g., spinning reserve requirements, et al.)

End-use measure data

1. The energy savings for each hour of the year in kWh (or end-use load shape)
2. The total annual energy savings, kWh
3. The total annual demand savings, kW
4. The month and hour of the co-incident demand of the end-use measure.

Participant's input data

1. Participant's tax rate.
2. Participant's implementation cost
3. Participant's annual operation and maintenance cost
4. The annual number of program participants
5. The annual number of program "free riders".
6. The participant's annual electric rate escalation factor.
7. The participant's electric rate structure which will include the fixed customer charge and the block energy and demand charges for both summer and winter.

Societal benefits, environmental and other

1. The cost of emissions in dollars per kWh for NOx, SOx, particulate matter, CO, CO2, and HG, if applicable.
2. Any other identifiable societal benefits will be modeled as needed, and if applicable.

DSMore will produce the following elements as the output of processing and facilitate the prescreening evaluation of DSM programs:

- Energy and demand reductions on an hourly basis over the lifetime of the measure on a weather normalized basis meeting requirements of 4 CSR 240-22.050 (3) (A)
- The cost and benefits per installation of each end-use measure on an hourly basis over the lifetime of the measure using both a levelized avoided cost of demand and energy incorporating the utility discount rate and meets the requirements of 4 CSR 240-22.050 (3) (B)
- The incremental costs and benefits of implementing the measure for both utility and participant.
- All program costs including the initial cost and ongoing operation and maintenance costs to the participant.

- All costs to the utility including incentives, administration and ongoing operation and maintenance cost.
- The annualized cost and benefit over the lifetime of the measure and uses the utility discount rate.
- Financial tables of the annual costs and benefits.
- Uncertainty using a Monte Carlo simulation and incorporate both cost based and market price based outcomes.
- Valuations of end-use measures including consideration of weather effects, and covariance of prices and loads, hourly by weather station.
- Multiple test results under different price assumptions to assess program risk
- Results will include probability distributions as required by 4 CSR 240-22.050 (3) (C) 1. & 2.
- The environmental impact mitigation costs that are due to the measure that are borne by either the customer or the utility and meets the requirements of 4 CSR 240-22.050 (3) (C) 3.

(14) 4 CSR 240-22.050 (3) (F)

Current Requirement: End-use measures that pass the probable environmental benefits test must be included in at least one (1) potential demand side program.

Proposed Alternative: If KCPL does not include each end-use measure that passes the probable environmental benefits test in at least one potential demand-side program, it shall provide an explanation as to why that measure was not appropriate for inclusion.

Rationale: This section addresses the cost-effectiveness screening of end use measures. Typically many measures are screened to determine which measures should be included in the energy efficiency programs that will be assessed in subsequent stages of the analysis. The objective of this step is to combine measures in such a way that the program represents a compelling program offering to a particular market segment. The initial list of measures can include those that, while passing a simple cost-effectiveness test, are not easily or logically bundled with other measures as part of a program, and the design of a program solely to incorporate these measures may be inefficient and inconsistent with best practice program design. In addition there may be measures that pass which do not need specific incentives or attention for the market to respond. These measures may be far along the adoption curve with suspected or proven high free-ridership if the utility includes them within a program. Often these measures will be promoted through general energy efficiency education but not within a specific program. The intent of this waiver is to create the flexibility to exclude measures passing the cost-effectiveness screen if the projected impacts are extremely small, or if those measures cannot logically be bundled into programs or offered as a cost-effective stand-alone program. KCPL would be required to present the results of the full measure screening and a justification as to why any cost effective measures would be excluded from further analysis. Absent this waiver, there is a greater premium placed on a qualitative screening process that can eliminate measures expected to have little impact in the market due to applicability, market potential or feasibility.

(15) 4 CSR 240-22.050 (7)

Current Requirement: Section 22.050 (7) specifies in its entirety the methodology for the cost-effectiveness screening of demand side programs.

Proposed Alternative: KCPL intends to use the software package, DSMore, which was developed by Integral Analytics specifically for the evaluation of end-use energy efficiency programs.

Rationale: DSMore calculates all the standard energy efficiency cost effectiveness tests including the participant test, the utility test, the ratepayer impact test, the total resource test, societal test, plus a long run option value test. The DSMore societal test includes the environmental costs (benefits) associated with displaced energy and is considered equivalent to the required "probable environmental" cost included in the IRP rules.

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:

1. *Wilbur Strawn v. Kansas City Power & Light Co.*, MPSC Case No. EC-2007-0479.

2. *Richard Tolbert v. Kansas City Power & Light Co.*, MPSC Case No. EC-2007-0407.

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 3rd day of August 2007, upon:

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