BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light)	
Company's Renewable Energy Standard)	File No.
Compliance Plan)	

APPLICATION FOR VARIANCE

COMES NOW Kansas City Power & Light Company ("KCP&L" or "Company"), pursuant to 4 CSR 240-20.100(10) and 4 CSR 240-2.060(4), and hereby requests a variance of 4 CSR 240-20.100(7) which requires that the RES Compliance Plan be filed by April 15, and requests that the Company be granted a six (6) week extension until May 28, 2013 to file its RES Compliance Plan. In support of this application, the Company states as follows:

- 1. Missouri Public Service Commission (Commission) rule 4 CSR 240-20.100(7) requires the filing of an Annual RES Compliance Report and a RES Compliance Plan by April 15 of each year. The RES Compliance Plan is to include a "detailed explanation of the RES retail impact limit calculated in accordance with section (5)" of the rule. 4 CSR 240-20.100(7)(B)1F.
- 2. The Company is currently in the process of preparing its Annual RES Compliance Report, and intends to file the Annual RES Compliance Report on April 15, 2013. However, additional time is necessary to ensure that the RES Compliance Plan complies with Section 393.1030 RSMo Supp. 2009, the Commission's RES rules, and *State ex rel. Missouri Energy Development Association v. Public Service Commission*, 386 S.W.3d 165 (Mo. App. 2012).

OTHER INFORMATION

- 3. Pursuant to 4 CSR 240-2.060(1), the Company provides the following additional information. KCP&L is a Missouri corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. KCP&L is primarily engaged in the business of generating, transmitting, distributing, and selling electric energy in portions of eastern Kansas and western Missouri. KCP&L is an electrical corporation and public utility as defined in Section 386.020, Mo. Rev. Stat. (2000), as amended. KCP&L provided its Certificate of Good Standing in Case No. EF-2002-315 which is incorporated herein by reference.
- 4. KCP&L 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. KCP&L has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court that involves customer service or rates, which has occurred within three years of the date of this Application other than the following pending actions: *Emma J. McFarlin and Rebecca Shepherd v. Kansas City Power & Light Company*, Case No. EC-2013-0024; *Earth Island Institute d/b/a Renew Missouri, et al. v. Kansas City Power & Light Company*, Case No. EC-2013-0379. No annual report or assessment fees are overdue.
- 5. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

Tim Rush
Director—Regulatory Affairs

Kansas City Power & Light Company 1200 Main Street 19th Floor Kansas City, Missouri 64105

Phone: (816) 556-2344

Fax: (816) 556-2110

Email: Tim.Rush@kcpl.com

WHEREFORE, KCP&L respectfully requests the Commission grant it a variance from the April 15th filing requirement for its RES Compliance Plan and instead allow the Company to make the filing by May 28, 2013.

Respectfully submitted,

|s| James M. Fischer

James M. Fischer, MBN 27543 Fischer & Dority, P.C. 101 Madison—Suite 400 Jefferson City, MO 65101 Phone: (573) 636-6758 ext. 1

Email: jfischerpc@aol.com

Roger W. Steiner, MBN 39586 Kansas City Power & Light Company 1200 Main—16th Floor Kansas City, Missouri 64105 Phone: (816) 556-2314

Phone: (816) 556-2314 Fax: (816) 556-2787

Email: roger.steiner@kcpl.com

Attorneys for Kansas City Power & Light Company

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission, facsimile or email to all counsel of record on this 11th day of April 2013, to the following:

General Counsel Office Missouri Public Service Commission 200 Madison Street, Suite 800 P.O. Box 360 Jefferson City, MO 65102 GenCounsel@psc.mo.gov Lewis Mills
Office Of Public Counsel
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opcservice@ded.mo.gov

/s/ James M. Fischer
James M. Fischer