

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

Joint Application of Kansas City Power &)	
Light Company and KCP&L Greater Missouri)	
Operations Company for A Variance from the)	Case No. _____
Provisions of 4 CSR 240-20.100(4)(H)(2))	
Related to Tariff Submission Date.)	

JOINT APPLICATION

Pursuant to 4 CSR 240-2.060, 4 CSR 240-3.015, 4 CSR 240-20.100(10) and 4 CSR 240-2.080(16), Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively “Applicants”) hereby respectfully submit to the Missouri Public Service Commission (“Commission”) a joint application (“Application”) for a variance from the provisions of 4 CSR 240-20.100(4)(H)(2), to allow Applicants to delay the filing of tariff sheets detailing the provision of a standard offer contract for the purchase of solar renewable energy credits (“S-RECs”) beyond the prescribed November 1 submission date. In support of their Application, Applicants state as follows:

I. APPLICANTS

1. KCP&L is a Missouri corporation with its principal office and place of business at One Kansas City Place, 1200 Main, 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 Mo. Rev. Stat. § 386.020 (2000). KCP&L provided its Certificate of Good Standing in Case No. EF-2002-315, which is incorporated herein by reference.

2. GMO is a Delaware corporation with its principal office and place of business at One Kansas City Place, 1200 Main, Kansas City, Missouri 64105. GMO is primarily engaged in

the business of providing electric and steam utility service in Missouri to the public in its certificate areas. GMO is an electrical corporation and public utility as defined in Mo. Rev. Stat. § 386.020 (2000). A Certificate of Authority for a foreign corporation to do business in the State of Missouri, evidencing GMO's authority under the law to conduct business in the State of Missouri, was filed with the Commission in Case No. EU-2002-1053 and is incorporated herein by reference in accordance with 4 CSR 240-2.060(1)(G). GMO's fictitious name registration was filed in Case No. EN-2009-0015 and is incorporated herein by reference.

3. Applicants have no pending action or final unsatisfied judgments or decisions against them 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 except as provided in Attachment No. 1. No annual report or assessment fees are overdue.

4. 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
1200 Main - 19th Floor
Kansas City, Missouri 64105
Phone: (816) 556-2344
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E-mail: Tim.Rush@kcpl.com

II. EXTENSION TO SUBMIT TARIFF SHEETS

5. Commission Rule 4 CSR 240-20.100, Electric Utility Renewable Energy Standard Requirements, sets the definitions, structure, operation and procedures relevant to compliance with the Renewable Energy Standard. 4 CSR 240-20.100(4)(H)(2), relating to Standard Offer Contracts, provides:

2. If the electric utility chooses to offer a standard offer contract, the electric utility shall file tariff sheets detailing the provision of the contract no later than November 1 each year for the following compliance year. Workpapers documenting the purchase prices shall be submitted with the tariff filing.

6. In EE-2011-0119, the Commission granted the Applicants a variance from the requirements of 4 CSR 240-20.100(4)(H)(2) to permit them to delay the filing of tariff sheets detailing the provisions of a standard offer contract until November 1, 2011.

7. The Applicants are not prepared at this time to offer a standard offer contract until the accounting treatment of costs associated with the standard offer is addressed. In order to bring certainty to the issue, the Applicants anticipate filing an Accounting Authority Order (“AAO”) application in the near future regarding accounting treatment of these costs. It is possible that Applicants will be filing tariff sheets detailing the provisions of a standard contract before November 1, 2012. However, to ensure that the Applicants are not in violation of the rule, Applicants request a waiver of the standard offer tariff requirement at least until November 1, 2012.

III. WAIVER OF 4 CSR 240-4.020

8. The Company hereby requests a waiver for good cause of 4 CSR 240-4.020 (Ex Parte and Extra Records Communications Rule). Section 2 of the rule requires a notice to be filed with the Commission 60 days prior to filing a contested case. The Company is uncertain if this rule applies to the instant waiver application. In the event the rule does apply, the Company requests a waiver of the 60-day notice requirement as this waiver request should be considered at the time of the Company’s AAO application.

WHEREFORE, for the foregoing reasons, KCP&L and GMO respectfully request that the Commission grant them a variance from 4 CSR 240-20.100(4)(H)(2) to permit them to delay the filing of tariff sheets detailing the provision of a standard offer contract for the purchase of solar renewable energy credits ("S-RECs") until November 1, 2012.

Respectfully submitted,

/s/ Roger W. Steiner

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**ATTORNEYS FOR KANSAS CITY POWER &
LIGHT COMPANY AND KCP&L GREATER
MISSOURI OPERATIONS COMPANY**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand delivered, emailed or mailed, postage prepaid, this 31st day of October, 2011, to:

General Counsel
Missouri Public Service Commission
200 Madison Street, P.O. Box 360
Jefferson City, MO 65102

Office of the Public Counsel
200 Madison Street, Suite 650
Jefferson City, MO 65102

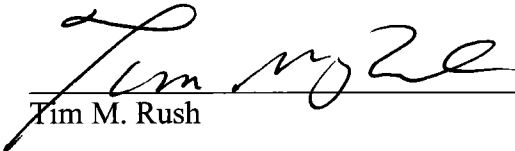
/s/ Roger W. Steiner

Roger W. Steiner

AFFIDAVIT

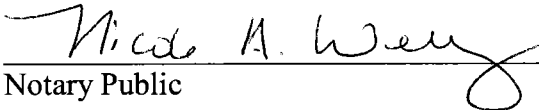
State of Missouri)
) ss
County of Jackson)

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 ("KCP&L"), that I am duly authorized to make this affidavit on behalf of KCP&L and GMO, and that the matters and things stated in the foregoing joint application and appendices thereto are true and correct to the best of my information, knowledge and belief.

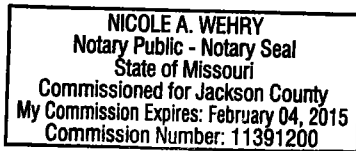


Tim M. Rush

Subscribed and sworn before me this ^{October} 31st day of ~~November~~, 2011.



Notary Public



Attachment No. 1

Kansas City Power & Light Company-Customer Complaints in Missouri

Briarcliff Development Company v. Kansas City Power & Light Company, Case No. EC-2011-0383.

Kansas City Power & Light Company-Customer Complaints in Kansas

NONE.

KCP&L Greater Missouri Operations Company-Customer Complaints in Missouri.

Ag Processing, Inc. a Cooperative v. KCP&L Greater Missouri Operations Company, Case No. HC-2010-0235; *Eddie Shepherd v. KCP&L Greater Missouri Operations Company*, Case No. EC-2011-0373; and, *Brent Fallon v. KCP&L Greater Missouri Operations Company*, Case No. EC-2012-0007.