

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

In the Matter of the Application of Kansas City)
Power & Light Company for Approval to Make)
Certain Changes in its Charges for Electric) **File No. ER-2010-0355**
Service to Continue the Implementation of Its)
Regulatory Plan)

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for) **File No. ER-2010-0356**
Approval to Make Certain Changes in its)
Charges for Electric Service)

**KANSAS CITY POWER & LIGHT COMPANY’S AND KCP&L GREATER MISSOURI
OPERATIONS COMPANY’S MOTION FOR RECONSIDERATION, OR IN THE
ALTERNATIVE REQUEST FOR EXTENSION OF TIME TO DELIVER DOCUMENTS
TO THE SPECIAL MASTER**

COMES NOW, Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively known as the “Company”), and for its Motion For Reconsideration, Or In the Alternative, Motion For Extension Of Time To Deliver Documents to the Special Master, states as follows:

1. On November 1, 2010, Staff requested the Missouri Public Service Commission (“Commission”) to appoint a Special Master to conduct *in camera* reviews of certain documents produced by the Company. Attachment A to the Staff’s Motion contained a listing of 67 data requests that the Company has responded to with a substantial number of documents that included redactions related to the Company’s assertions of attorney-client privileges, attorney-work product privileges, or the accountant-client privilege.

2. On November 12, 2010, the Company filed its Response to Staff’s Motion for Special Master. Among other things, the Company argued that several of the Staff data requests (631, 339, 342, 350, 358, 360, 363, 370, 411, 413, 415, 430, 490, and 710) had already been

addressed by Regulatory Law Judge Harold Stearley in an earlier proceeding and were overly broad, and that the Staff should be required to narrow its data requests.

3. On November 23, 2010, the Commission issued its *Order Appointing Special Master and Clarifying July 7, 2010 Order*, which appointed Regulatory Law Judge Stearley as a Special Master in this proceeding to review the documents contained in Attachment A. In addition, KCP&L was directed to deliver a copy of the unredacted documents listed in Attachment A of Staff's Request for a Special Master, under seal, no later than Tuesday, November 30, 2010.

4. As pointed out in the Company's Response To Staff Motion For Special Master filed on November 12, 2010, the number of documents identified in Attachment A is substantial, and it will take time to reproduce unredacted versions of these documents for review by the Special Master. The process of providing these documents is made more difficult by the fact that the majority of the data requests are from 2009.

5. The Company is in the process of accumulating many of these documents, and making copies for delivery to the Special Master, as directed by the Commission. The Company believes that it will be in a position to deliver documents related to Data Requests 339, 342, 350, 353, 358, 360, 363, 370, 373, 394, 411, 413, 430, 471, 471R, 490, 630.4, 677, and 715.1 to the Special Master by November 30. However, it is not physically possible to locate the documents, make copies and deliver the remaining data requests by Tuesday, November 30. Therefore, the Company must respectfully request that the Commission reconsider its Order, or in the alternative, grant the Company an extension of time until December 15, 2010 to deliver the unredacted documents associated with Data Requests 397, 415.1, 415I, 415I2, 415S, 622.5, 631, 673, 673.1, 710, 710.1S, 710S, 710S1, 720, 817, 865, 865R, and 888 to the Special Master.

6. The Company objected to several of the data requests (637.1, 863, 900.1, and 902.1) as being unduly broad and burdensome in addition to attorney-client privilege. The Company believes that Staff must file a Motion to Compel so that the Commission can rule on this objection and determine if the Company must expend its resources to produce those documents. For example, data request 637.1 asks for all copies of e-mails between KCP&L and STS related to the Iatan Construction projects. The Company indicated to Staff in its September 25, 2009 objection that it would have to review over 70,000 e-mails to respond to this request.

7. For several other data requests (360S, 368, 398, 398S, 418, 418R, 422, 424, 433, 433R, 436, 436R, 853, 871, 872, and 873), the Company will need to review its records in order to produce unredacted copies to the Special Master. The Company requests that it be allowed to evaluate these data requests further and file a status report with the Special Master on December 15, 2010.

8. For the following data requests (337, 348, 427, 439.2, 630.3, 650, 843, 899, 963, and 964), the Company believes that it has fully responded to the data requests and that there are no privileged documents to produce.

WHEREFORE, for the above reasons, the respectfully requests that the Commission reconsider its Order issued on November 23, 2010.

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner, MBN 39586
Kansas City Power & Light Company
1200 Main Street
Kansas City, MO 64105
Telephone: (816) 556-2314
Facsimile: (816) 556-2787
email: roger.steiner@kcpl.com

James M. Fischer, MBN 27543
email: jfischerpc@aol.com
Fischer & Dority, P.C.
101 Madison Street, Suite 400
Jefferson City, MO 65101
Telephone: (573) 636-6758
Facsimile: (573) 636-0383

**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 29th day of November, 2010, to all counsel of record.

/s/ Roger W. Steiner

Roger W. Steiner