



**Law Department**

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January 25, 2012

Mr. Kevin D. Gunn  
Chairman  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

*Re: Major Case Filing Timing*

Dear Chairman Gunn:

Kansas City Power & Light Company, its management and employees place an exceptionally high value on honesty, integrity and transparency. In fact, the higher purpose and standard by which we work to conduct our business is to "improve life in the communities we serve." In your letter of January 17, 2012, you voice concern over the possibility that the Company timed its rate cases to coincide with a rate case filed by Ameren Missouri with the specific intent "to overwhelm the resources of the Commission staff, the Office of Public Counsel and any other intervenor." We are surprised by your letter, take it very seriously and deny that we have coordinated the timing of our proposed Missouri rate cases with Ameren Missouri or any other Missouri investor owned utility to purposefully strain resources.

The decision to file a rate case is one of the most significant management decisions an investor owned utility makes. Consequently, the Company bases rate case filings solely on its financial needs and the potential impact on our customers. The timing of other companies' regulatory filings does not impact the timing of ours.

The rate case process is, by its nature, complex and requires the preparation and presentation of a vast amount of information from a multitude of sources. As a result, case preparation takes a significant amount of time and work long before a notice is ever filed. For example, strategic planning for the Company's upcoming rate cases began in late 2010. Later, the Company determined that rate cases would likely need to be designed and filed to effect rate changes no later than January of 2013.

Mr. Kevin D. Gunn

January 25, 2012

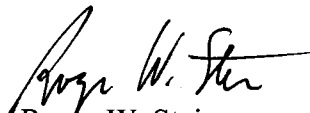
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This internal decision making and resulting preparation work has been reflected by the Company's public messaging about its plans. For nearly a year, this Company has publicly discussed the need to have new rates effective January 2013. In its February 25, 2011 earnings call, we indicated that the Company was considering filing rate cases in late 2011 or early 2012. Subsequently, on August 8, 2011, we gave a presentation to the investment analyst community and articulated our need in both Missouri and Kansas for new rates effective by January 2013. In a September investor presentation and in a November 4, 2011 earnings call, we again reiterated our expectation of filing applications for new rates effective January 2013.

As you know, under the Commission's rules, the Company, like all Missouri utilities, must provide notice 60 days before filing a contested case. This notice requirement, coupled with the authority of the Commission to suspend a tariff increasing rates for up to 11 months, means the Company must schedule its initial filing more than 13 months before the desired effective date of the requested rate increase. In order to have new rates effective in January 2013, the Company must file its rate cases by February 2012 and had to file notice of these rate case filings 60 days in advance. Consequently, in order to implement the financial and strategic plans of the Company and comply with the Commission's rules, the Company had to file its rate case notices by December 1, 2011.

While the Company understands your concerns regarding the workload and resources of the Commission staff and the Office of Public Counsel, any suggestion that the timing of the Company's rate case filings is intended to cause hardship is untrue.

Sincerely,



Roger W. Steiner

cc: Mr. Steven Reed, Secretary/General Counsel (MPSC)  
Mr. Lewis Mills, Public Counsel  
Ms. Cherlyn Voss, Director of Regulatory Review Division (MPSC)