

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

In the Matter of the Resource Plan of	)	
Kansas City Power & Light Company	)	Case No. EO-2007-0008
Pursuant to 4 CSR 240-22	)	

APPLICATION FOR EXTENSION OF TIME

Pursuant to 4 CSR 240-2.080 and 4 CSR 240-22.080(8), Kansas City Power & Light Company ("KCPL") hereby submits to the Public Service Commission of the State of Missouri ("Commission") a Motion for Extension of Time to Provide A Joint Agreement to Remedy Deficiencies.

1. On July 5, 2006, KCPL submitted to the Commission KCPL's compliance filing with Chapter 22 of the Commission's regulations concerning KCPL's resource planning. Concurrently with that submission, KCPL also submitted an application for extensions of time and waivers concerning certain resource planning filing requirements.

2. On November 15, 2006, the Missouri Department of Natural Resources ("Department") and the Office of the Public Counsel ("Public Counsel") filed the "Missouri Department of Natural Resources and Missouri Office of the Public Counsel Notice of Reaching an Agreement in Principle with Kansas City Power & Light Company and Request for Suspension of Filing Deadline" ("Notice of Agreement in Principle").

3. Pursuant to 4 CSR 240-22.080(5), on November 15, 2006, the Staff of the Commission ("Staff") submitted its Report concerning the adequacy of KCPL's July 5 compliance submission and related application. Staff's Report alleges certain deficiencies in KCPL's compliance filing.

4. The Commission's resource planning regulations provide that "If the staff, public counsel or any intervenor finds deficiencies, it shall work with the electric utility and the other parties to reach, within forty-five (45) days of the date that the report or comments were submitted, a joint agreement on a plan to remedy the identified deficiencies." 4 CSR 240-22.080(8). Because Staff submitted its report on November 15, 2006, the joint agreement contemplated in 4 CSR 240-22.080(8) is due to be submitted to the Commission by December 30, 2006.

5. The parties to this proceeding have been working diligently to reach a joint agreement that reflects the "agreement in principle" between KCPL, the Department, and Public Counsel referenced in the November 15, 2006 Notice of Agreement in Principle and includes a plan to remedy the deficiencies identified by Staff in its November 15 Report. As a result of several productive conference calls and the exchange of draft documents, all of the active parties have reached an agreement in principle that expands on the "agreement in principle" between KCPL, the Department, and Public Counsel in that it also addresses the deficiencies identified by Staff in its November 15 Report.

6. However, with the existing and continuing heavy case loads, the parties will not be able to provide to the Commission a finalized, executed joint agreement by the December 30, 2006 deadline or immediately thereafter. Consequently, KCPL on behalf of itself and the other parties to this proceeding respectfully requests an additional forty-five days—until February 13, 2007—to draft, finalize and execute a joint agreement on a plan to remedy the deficiencies Staff identified in its November 15 Report.¹

¹ Staff, the Department and Public Counsel have expressly authorized KCPL to submit this motion on their behalf. KCPL was unable to obtain such authorization from Praxair, but KCPL does not have any reason to believe that Praxair would object to this request.

7. Good cause exists to grant the requested extension of time because it will enable the parties to memorialize their agreement concerning how to remedy all of the deficiencies Staff identified in its Report. If at any time it becomes apparent that the agreement will not address all of the identified deficiencies, KCPL will notify the Commission so that the Commission can take appropriate action to restart the schedule for a contested proceeding.

For the foregoing reasons, KCPL respectfully requests that the Commission extend until February 13, 2007 the deadline to submit a joint agreement on a plan to remedy the deficiencies Staff identified in its November 15 Report.

Respectfully submitted,



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Dated: December 27, 2006

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing response was served via e-mail or first class mail, postage pre-paid, on this 27th day of December 2006, upon:


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