

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

Application of Kansas City Power & Light)	
Company for an Extension of Time To Comply)	
with the Provision of its Regulatory Plan)	Case No. EO-2006-0281
Stipulation and Agreement Concerning Wind)	
Measuring Equipment in Missouri)	

**RESPONSE OF KANSAS CITY POWER & LIGHT COMPANY
TO COMMISSION ORDER DIRECTING FILING
AND REQUEST FOR FURTHER EXTENSION OF TIME**

Pursuant to the order issued by the Missouri Public Service Commission ("Commission") on February 22, 2006, Kansas City Power & Light Company ("KCPL") hereby respectfully submits its explanation of the timing of its December 29, 2005 application (the "Application") for an extension of time to comply with the provision in KCPL's Regulatory Plan Stipulation and Agreement in Case No. EO-2005-0329 ("Stipulation and Agreement") concerning the installation of certain wind measuring equipment in the State of Missouri. KCPL also respectfully requests herein a further extension of time until no later than September 30, 2006, to comply with that provision. In support of its compliance filing and request for further extension of time, KCPL offers as follows:

1. Section B.4 of the Stipulation and Agreement provides as follows:

KCPL will obtain access to two (2) Missouri wind assessment locations and will contract to install wind measuring equipment and evaluate data collected at levels between 50 meters up to and including 100 meters above ground level for the ultimate purpose of producing site-specific measurements that can be used to quantify the wind resources in Missouri. The two (2) Missouri tall tower installations will be in place and operating by December 31, 2005. The initial report analyzing the first 12 months of tall tower data will be completed by March 31, 2007. The final report analyzing the first 18 to 21 months of data will be completed by December 31, 2007.

2. In the Application, KCPL requested that the Commission extend the deadline to install wind measuring equipment until March 31, 2006 so that KCPL could continue to work with the Missouri Department of Natural Resources ("MDNR") and the University of Missouri ("MU") to finalize and implement a more comprehensive Missouri wind study plan, *i.e.*, the "Tall Tower Research Project of Western Missouri Wind Patterns" (the "Tall Tower Project").

3. On February 22, 2006, the Commission issued an order directing KCPL "to file a statement setting forth the reason(s) for filing its request no sooner than two days prior to the relevant deadline."

I. COMPLIANCE WITH ORDER DIRECTING FILING

4. KCPL filed its request for an extension of time on December 29, 2005, because (i) it has taken longer than anticipated to memorialize the terms of KCPL's participation in the Tall Tower Project and (ii) it has been significantly more difficult and time consuming than anticipated to secure a location for wind measuring equipment on existing towers as contemplated in the Tall Tower Project.

5. KCPL hoped to finalize the terms of its participation in the Tall Tower Project and have wind measurement equipment in place on towers in two locations in Missouri by December 31, 2005 in compliance with the Stipulation and Agreement. It did not become apparent that this goal was unreachable until mid-late December of 2005. It was at that time that KCPL submitted the Application to extend that deadline.

6. None of the parties, *i.e.*, KCPL, MDNR and MU, has previously undertaken a project like the Tall Tower Project. Although each of the parties continues to support the project and are working together to finalize an agreement, it has taken longer than anticipated to design the project and to memorialize each of the party's respective roles therein.

7. One of the benefits of the Tall Tower Project is its use of preexisting towers on which to locate wind measurement equipment instead of constructing new towers for that purpose. Such an approach will not only be less expensive, but will have a significantly less adverse impact on the environment. However, gaining permission to locate wind measurement equipment on existing towers has proven to be far more difficult than the participants in the Tall Tower Project anticipated.

8. KCPL initially believed that a telecommunications service provider would permit KCPL to locate wind measurement equipment on two of its towers by the December 31, 2005 deadline established in the Stipulation and Agreement. However, engineering concerns and the terms of such a location agreement have been difficult to resolve. Although KCPL continues to attempt to resolve these issues with that tower owner, it is also discussing alternatives with other tower owners.

9. KCPL has two 100-meter towers in its Eastern District. KCPL could comply with the terms of the Stipulation and Agreement in a very short period of time by placing wind measuring equipment on those two towers. Doing so, however, would result in wind measurement data of somewhat limited use, especially when compared to the more comprehensive data contemplated in the Tall Tower Project.

10. The wind data generated by the Tall Tower Project will have a greater application than evaluating potential sites for KCPL's possible second 100 MW wind generation facility in 2008. KCPL believes that a more comprehensive wind study, as contemplated in the Tall Tower Project, will create an incentive for national and international wind generation developers to study potential sites in Missouri.

11. KCPL regrets any inconvenience caused by the timing of its submission of the Application. KCPL had hoped to finalize the terms of the Tall Tower Project and have wind measurement equipment in place on two telecommunication towers by December 31, 2005. When it became apparent that this goal could not be met, KCPL sought an extension of time.

II. REQUEST FOR FURTHER EXTENSION OF TIME

12. Although KCPL and the other participants in the Tall Tower Project continue to experience the difficulties described above, the participants are confident that they are working toward a positive resolution. However, it now appears that the Tall Tower Project's wind measurement facilities will not be in place by the March 31, 2006 extended deadline that KCPL requested in the Application. KCPL and the other Tall Tower Project participants will continue to work diligently to install wind measurement equipment on two towers in Missouri as soon as possible. It is possible that such equipment could be in place in the next couple of months, but it could take as many as six months. Consequently, KCPL and MDNR respectfully request that the Commission further extend the deadline for compliance until no later than September 30, 2006.

13. The Stipulation and Agreement provides that KCPL will complete an initial report analyzing the first 12 months of tall tower data by March 31, 2007 and a final report analyzing the first 18 to 21 months of data by December 31, 2007.

14. Extending the deadline for the installation of wind measurement equipment beyond March 31, 2006 will necessitate adjusting either the duration of the period analyzed in these reports or the timing of KCPL's submission of the reports. Specifically, KCPL could either meet the deadline set forth in the Stipulation and Agreement, but analyze data for a shorter period of time, or KCPL could analyze data for the full 12- and 18-month periods, but submit the reports after the deadlines set forth in the Stipulation and Agreement. KCPL and MDNR believe

that the latter approach will result in a more useful wind data assessment and respectfully request that the Commission extend the deadlines for the reports until 14 and 20 months, respectively, after the installation of the wind measurement equipment.

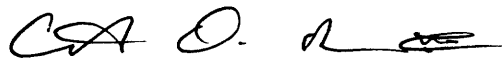
15. KCPL and MDNR remain committed to the Tall Tower Project and believe that the resulting wind measurement data will be superior to the data that would result from KCPL unilaterally placing wind measurement equipment on two of its towers. Regrettably, figuring out how best to design and implement the Tall Tower Project is taking more time than KCPL or MDNR anticipated. The project participants have not previously undertaken such a project, and they are attempting to ensure that the project results in the most useful wind measurement data possible. KCPL and MDNR believe that any problems associated with the requested extension of time are more than offset by the benefits of taking the time to confirm that the Tall Tower Project is designed and implemented properly.

16. KCPL anticipates executing a Tall Tower Project participation agreement with MDNR and MU in the near future. KCPL will submit that agreement in this proceeding once it is executed. That agreement will set forth the obligations of the respective parties as well as a timeline for completion of the project.

III. CONCLUSION

17. For the foregoing reasons, KCPL respectfully requests that the Commission (i) accept this compliance filing explaining why KCPL submitted the Application on December 29, 2005 and (ii) extend the deadlines for wind measurement data set forth in the Stipulation and Agreement, so that the wind measurement equipment will be in place by no later than September 30, 2006, and the 12- and 18-month reports will be submitted within 14 and 20 months, respectively, after the installation of the equipment.

Respectfully submitted,



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Dated: March 30, 2006

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing comments were served via first class mail, postage pre-paid, on this 30th day of March, 2006 upon each of the following parties of record:

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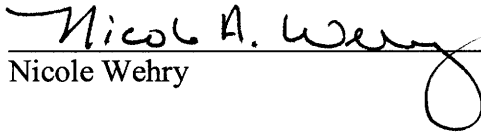
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