BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of a Proposed Experimental Regulatory Plan of Kansas City Power and Light Company

Case No. EO-2005-0329

CONCERNED CITIZENS OF PLATTE COUNTY AND SIERRA CLUB'S REQUEST FOR <u>A FULL EVIDENTIARY HEARING</u>

Come now Concerned Citizens of Platte County ("CCPC") and Sierra Club ("SC") and pursuant to RSMo 386.420 request a full evidentiary hearing on the matters contained in the stipulation filed by Kansas City Power and Light on March 28 or 29, 2005. In support of their request, CCPC and SC state the following.

1. The statutes and regulations relating to the Public Service Commission contemplate that a contested case will be heard before a stipulation is adopted which sets in motion future rate increases and the construction of a new coal-fired power plant.

2. The evidence produced by Kansas City Power and Light during the workshops in 2004 has never been subjected to cross-examination.

3. Other energy experts have different opinions and the Public Service Commission cannot consider all alternatives without first hearing those opinions.

WHEREFORE, Concerned Citizens of Platte County and Sierra Club respectfully request the Public Service Commission to hold a full evidentiary hearing on the stipulation.

> /s/ Kathleen G. Henry Kathleen G. Henry (Mo. Bar No. 39504) Bruce A. Morrison (Mo. Bar No. 38359) Great Rivers Environmental Law Center 705 Olive Street, Suite 614 St. Louis, Missouri 63101 (314) 231-4181 (314) 231-4184 khenry@greatriverslaw.org

CERTIFICATE OF SERVICE

I hereby certify that a true and correct pdf version of the foregoing was sent by email on this 19th day of April, 2005, to the following:

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> /s/Kathleen G. Henry Kathleen G. Henry