

**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)
Stipulation and Agreement Concerning Wind)
Measuring Equipment in Missouri)

Case No. _____

**APPLICATION FOR EXTENSION OF TIME TO COMPLY WITH
PROVISION OF STIPULATION AND AGREEMENT CONCERNING
INSTALLATION OF WIND MEASURING EQUIPMENT**

Pursuant to 4 C.S.R. 240-2.060, Kansas City Power & Light Company ("KCPL" or "Applicant") hereby respectfully submits to the Missouri Public Service Commission ("Commission") an application ("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. In support of its Application, KCPL offers as follows:

I. APPLICANT

1. KCPL is a Missouri corporation with its principal office and place of business at 1201 Walnut, Kansas City, Missouri 64106-2124. KCPL is primarily engaged in the business of generating, transmitting, distributing, and selling electric energy in portions of eastern Kansas and western Missouri. KCPL is an electrical corporation and public utility as defined in Mo. Rev. Stat. § 386.020 (2000). KCPL provided its Certificate of Good Standing in Case No. EF-2002-315. It is incorporated herein by reference.

2. KCPL holds Certificates of Convenience and Necessity from the Commission to transact business as an electric public utility in certain areas of the State of Missouri and is principally engaged in the generation, transmission, distribution and sale of electric power and energy. KCPL has no pending action or final unsatisfied judgments or decisions against it from

any state or federal agency or court that involve customer service or rates, which has occurred within three years of the date of this Application. No annual report or assessment fees are overdue.

3. Pleadings, notices, orders and other correspondence and communications concerning this Application should be addressed to the undersigned counsel and:

Tim M. Rush
Director Regulatory Affairs
Kansas City Power & Light Company
1201 Walnut – 13th Floor
Kansas City, Missouri 64106
Phone: (816) 556-2344
Fax: (816) 556-2110
E-mail: Tim.Rush@kcpl.com

II. BACKGROUND

4. KCPL, the Staff of the Commission, the Missouri Department of Natural Resources (“MDNR”), the Office of Public Counsel (“OPC”), and several other interested parties submitted the Stipulation and Agreement for the Commission’s approval on March 28, 2005. The Commission approved the Stipulation and Agreement by order issued July 28, 2005.

5. 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.

III. APPLICATION

6. After careful consideration, KCPL began working with MDNR and the University of Missouri ("MU") on a collaborative Missouri wind study that will result in better data than the KCPL-initiated wind study contemplated in the Stipulation and Agreement. However, the collaborative study will not have wind measuring equipment in place by December 31, 2005, as set forth in the Stipulation and Agreement. KCPL therefore respectfully requests that the Commission extend the deadline to install wind measuring equipment until March 31, 2006 so that KCPL can work with MDNR and MU to finalize and implement a more comprehensive Missouri wind study plan.

7. KCPL considered three alternatives to satisfy its obligation under the Stipulation and Agreement to install certain wind measuring equipment in Missouri. Specifically, KCPL considered (i) constructing two 100 meter towers and installing wind measuring equipment on the towers; (ii) contracting with a third party to construct the towers and install wind measuring equipment; or (iii) participating in the "Tall Tower Research Project of Western Missouri Wind Patterns" (the "Tall Tower Project")—a more comprehensive Missouri wind study undertaken in conjunction with MDNR and MU. After weighing the costs and benefits of the three alternatives, KCPL elected to participate in the Tall Tower Project.

8. The Tall Tower Project will utilize existing communications and other towers across western Missouri to locate wind-measuring equipment. Such equipment will be located at various heights on the towers. Data collected by the equipment will be transmitted electronically to MU where it will be evaluated by representatives of MU, MDNR and KCPL. KCPL's participation in the Tall Tower Project is consistent with KCPL's obligation under the Stipulation and Agreement to evaluate wind resources in Missouri.

9. KCPL's participation in the Tall Tower Project is superior to the KCPL-initiated two-tower project contemplated in the Stipulation and Agreement in several respects. Specifically, the Tall Tower Project will measure wind at numerous sites in Western Missouri, which will provide much more comprehensive Missouri wind data than the two towers contemplated in the Stipulation and Agreement. Data from numerous sites is more consistent with the goal of the Stipulation and Agreement for KCPL to obtain "site-specific measurements that can be used to quantify the wind resources in Missouri." KCPL will have a fuller picture on which to base its decision where to site the potential second 100 MW of wind generation contemplated in the Stipulation and Agreement. Also, the Tall Tower Project will utilize existing communications and other towers as opposed to constructing new towers. Using existing towers is more environmentally benign, avoids potential siting issues, and will cost less.

10. In short, the Tall Tower Project is superior to the two-tower project contemplated in the Stipulation and Agreement. The Tall Tower Research Project will result in more comprehensive data covering more sites in Missouri. It is more environmentally benign. It avoids potential siting issues, and it will cost less. The only downside is that the wind measuring equipment will not be in place by the December 31, 2005 date provided in the Stipulation and Agreement.

11. Extending the deadline for the installation of wind measuring equipment until March 31, 2006 should not substantially interfere with the timeline for KCPL's analysis of Missouri wind data. As set forth in the Stipulation and Agreement, KCPL anticipates that it will complete the initial report analyzing the first 12 months of tall tower data by March 31, 2007, and that it will complete the final report analyzing the first 18 to 21 months of data by December

31, 2007. In any event, KCPL will have completed its report prior to siting the second 100 MW of wind generation contemplated in the Stipulation and Agreement.

For the foregoing reasons, KCPL respectfully requests that the Commission extend until March 31, 2006 the deadline provided in the Stipulation and Agreement for installing certain wind measuring equipment in Missouri. Such an extension will permit KCPL to participate in the Tall Tower Project, which will provide better data at a lower cost than the KCPL-initiated two-tower project contemplated in the Stipulation and Agreement.

Respectfully submitted,



Curtis D. Blanc (Mo. Bar No. 58052)
Kansas City Power & Light Company
1201 Walnut – 20th Floor
Kansas City, Missouri 64106
Phone: (816) 556-2483
Fax: (819) 556-2787
Email: Curtis.Blanc@kcpl.com

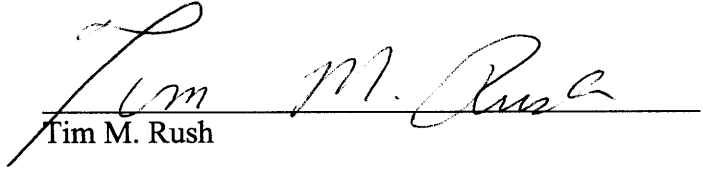
**ATTORNEY FOR
KANSAS CITY POWER & LIGHT COMPANY**

Dated: December 29, 2005

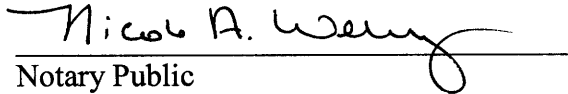
AFFIDAVIT

State of Missouri)
) ss
County of Jackson)

I, Tim M. Rush, having been duly sworn upon my oath, state that I am the Director, Regulatory Affairs of Kansas City Power & Light Company ("KCPL"), that I am duly authorized to make this affidavit on behalf of KCPL, and that the matters and things stated in the foregoing application and appendices thereto are true and correct to the best of my information, knowledge and belief.


Tim M. Rush

Subscribed and sworn before me this 29th day of December 2005.


Notary Public

