

**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 SECOND COMMISSION ORDER DIRECTING FILING**

Pursuant to the order issued by the Missouri Public Service Commission ("Commission") on April 20, 2006, Kansas City Power & Light Company ("KCPL") hereby respectfully submits its response to the Commission's inquiries concerning the installation of certain wind measuring equipment in the State of Missouri. In support of its compliance filing, KCPL offers as follows:

1. Section B.4 of KCPL's Regulatory Plan Stipulation and Agreement in Case No. EO-2005-0329 ("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 its submission in this proceeding dated March 30, 2006, KCPL requested that the Commission extend the deadline to install wind measuring equipment until no later than September 30, 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”). KCPL further requested that the Commission similarly extend the deadlines for the 12- and 18-month reports until 14 and 20 months, respectively, after the installation of the equipment.

3. In an order issued April 20, 2006, the Commission directed KCPL (i) to confirm whether it will be able to install 100 MW of new wind-generation facilities in 2008 if the Commission grants the extensions of time requested by KCPL in its March 30, 2006 submission and (ii) to explain to what extent, if any, granting the relief requested by KCPL in its March 30, 2006 submission would delay implementation of any other part of the Experimental Regulatory Plan.

4. As a point of clarification, KCPL notes that it did not commit in the Stipulation and Agreement to construct a second wind generation facility, nor did it commit to constructing such a facility in the state of Missouri. The Stipulation and Agreement provides that

An additional 100 MW of new wind generation facilities will be installed in 2008 if a detailed evaluation (made with input from interested Signatory Parties) supports such an action to proceed with its construction. KCPL’s detailed evaluation shall include information obtained from a tall tower wind assessment performed for KCPL at two sites in Missouri. The detailed evaluation will utilize the KCPL tall tower wind assessment information (and other Missouri-specific information, if available) to analyze the cost effectiveness of wind generation in Missouri before installing the second 100 MW of wind generation in any state other than Missouri.

KCPL will fully comply with these obligations. The extensions of time KCPL requested in its March 30, 2006 submission should not affect its ability to do so.

5. KCPL views the possibility of a May 31, 2008 deadline for the 18-month wind data report as a worst-case scenario. According to KCPL’s extension request, the 18-month report would be due 20 months after the wind measurement facilities are in place. The May 31, 2008 report deadline therefore presumes that the wind measurement equipment is not in place

until September 30, 2006. KCPL anticipates having that equipment in place well in advance of that date.

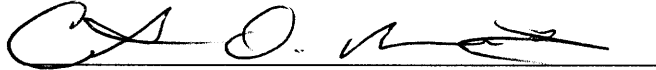
6. KCPL requested authorization to install the wind measurement equipment by “no later than” September 30, 2006 because that is the latest the facilities could be in place without adversely affecting KCPL’s decision to construct a second wind generation facility in 2008. So long as the wind measurement equipment is in place prior to September 30, 2006, KCPL believes that if it decides to construct a second wind generation facility, it could do so by December 31, 2008, barring the impact of external factors beyond KCPL’s control such as the availability of wind turbines at that time.

7. It is important to note that the 18-month wind data report will not be the first or only wind data that KCPL will consider when deciding whether to construct a second wind generation facility, and if so, where to site such a facility. Nor will wind data be the sole determinant. Even if the wind measurement equipment is not in place until September 30, 2006, KCPL will submit the 12-month wind data report by November 30, 2007. KCPL will also have subsequent data leading to the submission of the 18-month report well in advance of the May 2008 worst-case deadline for the report. KCPL believes that it will have sufficient wind data to determine whether to construct a wind generation facility in Missouri in time to potentially do so by December 31, 2008.

8. In sum, if KCPL determines that it will construct a second 100 MW wind facility, KCPL believes that it could do so by December 31, 2008 even if the Commission grants KCPL the extensions of time it requested in its March 30, 2006 submission, barring any adverse impacts of external factors. In addition, KCPL believes that the relief it requested in its March

30, 2006 submission would not delay implementation of any other part of the Experimental Regulatory Plan.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'C. D. Blanc', written over a horizontal line.

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**Attorney For Kansas City Power & Light Company**

Dated: April 24, 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 24<sup>th</sup> day of April 2006 upon each of the following parties of record:

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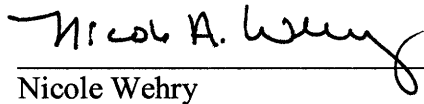
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