

In the Matter of the 2015 Triennial Integrated Resource Plan on Kansas City Power & Light Company Pursuant to 4 CSR 240-22 )  
 ) Case No. EE-2014-\_\_\_\_  
 )

Pursuant to 4 C.S.R. 240-2.060 and -22.080(13), Kansas City Power & Light Company (“KCP&L” or the “Company”), hereby respectfully submits to the Missouri Public Service Commission (“Commission”) an application (“Application”) for a variance concerning certain of the Commission’s Triennial Integrated Resource Plan (“IRP”) reporting requirements, as set forth in Chapter 22 of the Commission’s regulations.

## THE APPLICANT

1. KCP&L is a Missouri corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. KCP&L is primarily engaged in the generation, transmission, distribution, and sale of electricity in western Missouri and eastern Kansas, operating primarily in the Kansas City metropolitan area. KCP&L is an “electrical corporation” and “public utility” as those terms are defined in Mo. Rev. Stat. § 386.020 (2000) and, as such, is subject to the jurisdiction of the Commission as provided by law. KCP&L provided its Certificate of Good Standing in Case No. EF-2002-315, which is incorporated herein by reference.

2. KCP&L has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court that involves customer service or rates, which has occurred within three years of the date of this Application other than the following pending actions: *David L. Biersmith, Sr. v. Kansas City Power & Light Company*, Case No. EC-2014-

0249 and *Missouri Solar Energy Industries Association v. Kansas City Power & Light Company*, Case No. EC-2014-0278. 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 Rush  
Director, Regulatory Affairs  
Kansas City Power & Light Company  
1200 Main Street  
Kansas City, Missouri 64105  
Telephone: (816) 556-2344  
Facsimile: (816) 556-2110  
E-mail: [Tim.Rush@kcpl.com](mailto:Tim.Rush@kcpl.com)

#### **REQUEST FOR VARIANCE**

4. KCP&L hereby requests, pursuant to Commission Rule 4 CSR 240-22.080(13), a variance from Rule 4 CSR 240-22.045(3)(B)2 and Rule 4 CSR 240-22.045(3)(B)3 requiring Regional Transmission Organizations (RTO) expansion plan analysis specific to its Missouri customers.

5. Good cause exists for the variance request is necessary because the data required by KCP&L to perform the Missouri specific analysis is not available. Regional transmission plans are evaluated on utility/transmission owner costs and benefits. Results are not broken down by or identified on a state-by-state level. In Case No. EE-2013-0388, KCP&L requested a similar variance. In that case the Staff did not object to and the Commission approved the variance.

WHEREFORE, KCP&L respectfully requests that the Commission grant its Application for Variance Concerning the 2015 Triennial Integrated Resource Plan.

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner, MBN 39586

Corporate Counsel

Kansas City Power & Light Company

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Attorney for Kansas City Power & Light Company

#### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, postage prepaid, to all counsel of record in this case this 30<sup>th</sup> day of April, 2014.

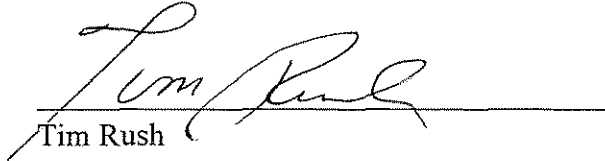
/s/ Roger W. Steiner

Roger W. Steiner

**A F F I D A V I T**

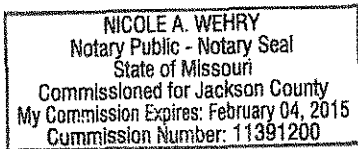
State of Missouri     )  
                                  ) ss  
County of Jackson    )

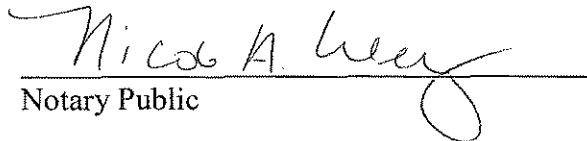
I, Tim Rush, having been duly sworn upon my oath, state that I am the Director of Regulatory Affairs of Kansas City Power & Light Company ("KCP&L"), that I am duly authorized to make this affidavit on behalf of the Applicant, and that the matters and things stated in the foregoing pleading are true and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

  
\_\_\_\_\_  
Tim Rush

Subscribed and sworn before me this 30<sup>th</sup> day of April, 2014.

My Commission Expires:



  
\_\_\_\_\_  
Notary Public