



Kansas City Power & Light®

WRITER'S DIRECT DIAL:

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December 10, 2002

FILED³

DEC 11 2002

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street
Jefferson City, Missouri 65102

**Missouri Public
Service Commission**

Re: In the Matter of the Application of Kansas City
Power & Light Company for a Variance from the
Separate Meter Requirement

Dear Mr. Roberts:

I have enclosed for filing the original and eight copies of Kansas City Power & Light Company's Application for a Variance from the Separate Meter Requirement.

Please bring this filing to the attention of the appropriate Commission personnel.

Sincerely,

CAROL SIVILS
Legal Assistant

Enclosures

cc: Dana K. Joyce, General Counsel
Office of the Public Counsel

FILED³

DEC 11 2002

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

**Missouri Public
Service Commission**

In the Matter of the Application of Kansas City)
Power & Light Company for a Variance From) Case No.
The Separate Meter Requirement)

**KANSAS CITY POWER & LIGHT COMPANY'S APPLICATION
FOR A VARIANCE FROM THE SEPARATE METER REQUIREMENT**

COMES NOW Kansas City Power & Light Company ("KCPL"), and pursuant to 4 CSR 240-20.050(5), and 4 CSR 240-2.060 (1) and (14), respectfully requests an order granting a variance from the separate meter requirement. In support of its request for a variance from the separate meter requirement promulgated by the Missouri Public Service Commission ("Commission"), KCPL states the following:

1. Owner David Postlewait was in the process of renovating a building. The project is located at 212 W. 39th Street, Kansas City, MO.
2. Recently, KCPL's Regulatory Services learned, subsequent to re-establishing permanent service to the building through one (1) meter, that the building's electric service plan called for a reduction in the number of meters serving the building. Originally the building was served by one (1) public service meter and eight (8) individual residential meters. Though inadvertent, the situation remains that KCPL believes that the Commission should be made aware of the situation and be given the opportunity to review the matter through this pleading.
3. KCPL comes to the Commission asking that in the interest of the customer, that KCPL be granted a variance from the separate metering requirement. Owner David Postlewait will be responsible for paying the electric bill for each unit and the common facilities, as the building is now master metered.

4. KCPL believes the customer's interest is best served by not requiring that any further re-construction activity take place disrupting his tenants' operations. KCPL is aware that it might be ordered by the Commission that such re-construction take place at KCPL's expense. However, there would be great cost to the customer and tenants as all internal wiring would need to be re-cabled to separate panels served by separate meters.

5. KCPL asks this fully understanding it's own tariffs and the State Regulation requiring separate metering. KCPL assures the Commission that sufficient training has been completed to advise all KCPL representatives having direct involvement in the construction planning area of State Regulation concerning separate metering with the expressed intent of avoiding the need for such similar requests in the future. KCPL understands its obligation to advise the customer on matters of resale and redistribution, such that individual tenants are not harmed by this matter on current and future lease agreements.

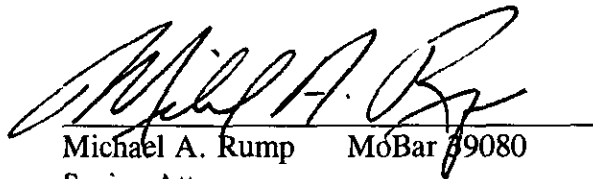
6. KCPL is a Missouri corporation in good standing in all respects, with its principal office and place of business located at 1201 Walnut, Kansas City, Missouri 64106. KCPL is engaged in the generation, transmission, distribution, and sale of electric energy and power in those areas in Missouri certified to it by the Commission, including the City of Kansas City, Missouri, as well as areas of eastern Kansas. KCPL is an "electrical corporation" and "public utility" as those terms are defined in Section 386.020 (15) and (42), RSMo Supp. 1999, and, as such, is subject to the jurisdiction of the Commission as provided by law. KCPL's Certificate of Good Standing was provided in Case No. EF-2002-315 and is incorporated herein by reference.

7. KCPL has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court, which involve customer service or rates, which has

occurred within three (3) years of the date of the Application, except as identified on Exhibit 1 hereto. No annual report or assessment fees are overdue.

WHEREFORE, KCPL respectfully requests that the Commission issue an order granting KCPL a variance from the separate metering requirement.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael A. Rump", is written over a horizontal line.

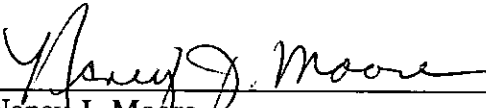
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ATTORNEY FOR KANSAS CITY
POWER & LIGHT COMPANY

VERIFICATION

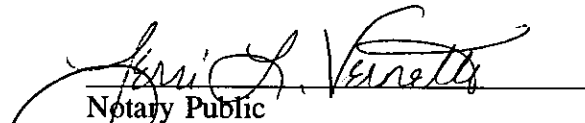
STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

Nancy J. Moore, having been duly sworn upon her oath, states that she is Vice President for Customer Service at Kansas City Power & Light Company and that the Application for a Variance From the Separate Meter Requirement is true and correct to the best of her information, knowledge and belief.



Nancy J. Moore

Subscribed and sworn to before me this 9th day of December 2002.



Notary Public

JERRI L. VERNETTI
Notary Public - Notary Seal
STATE OF MISSOURI
CLINTON COUNTY
MY COMMISSION EXP. DEC. 7, 2005

My Commission Expires:
12/7/05

EXHIBIT 1

The following is a list of Applicant's pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this application:

1. GST Appeal of Missouri Public Service Commission Decision; Case No. EC-99-553 in the Circuit Court of Cole County, Missouri; Docket No. 00CV324891; further appealed to the Court of Appeals of the Western District of Missouri by GST.
2. Hawthorn Station Incident Investigation before the Missouri Public Service Commission; Case No. ES-99-581.