

Case No. EC-2013-0024; *Earth Island Institute d/b/a Renew Missouri, et al. v. Kansas City Power & Light Company*, Case No. EC-2013-0379. 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:

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REQUEST FOR VARIANCES OR WAIVERS

4. On April 9, 2012, KCP&L submitted its compliance filing with Chapter 22 of the Commission's regulations concerning KCP&L's resource planning. The Commission assigned Case No. EO-2012-0323 to that proceeding.

5. On September 6, 2012, the Staff of the Commission, Office of Public Counsel, the Missouri Department of Natural Resources, the Natural Resources Defense Council and Sierra Club, submitted reports concerning the adequacy of KCP&L's resource planning submissions.

6. On November 19, 2012, those parties and KCP&L submitted a Joint Filing that included remedies to the alleged deficiencies and concerns, as well as, a list of unresolved alleged deficiencies. In that Joint Filing, KCP&L also included information regarding its intention to file a three month extension request for the 2013 Annual Update Report and Workshop. Many of the resolutions included in the Joint Filing are contingent upon a three month extension. All Signatories to the Joint Filing supported KCP&L's planned extension request at that time.

7. KCP&L hereby requests, pursuant to Commission Rule 4 CSR 240-22.080(13) and (15), for a variance from Rule 4 CSR 240-22.080(3) to extend the date for the 2013 Annual Update Report and the 2013 Annual Update Workshop by three months, such that KCP&L will submit the 2013 Annual Update Report no less than 20 days prior to the 2013 Annual Update Workshop, which is requested to be held on or about July 1, 2013. Additionally KCP&L also requests a variance from Rule 4 CSR 240-22.045(3)(B)2 and Rule 4 CSR 240-22.045(3)(B)3 requiring RTO expansion plan analysis specific to its Missouri customers.

8. Good cause exists for the variances requested herein. KCP&L has engaged Navigant Consulting to conduct a Demand-Side Management (DSM) Market Potential Study which is scheduled for completion in early February 2013. The Potential Study will assess the energy efficiency and demand response potential in the residential, commercial, and industrial sectors of KCP&L's service area. Given the potential impact of this study on the IRP and its components, and that the specific resolutions included in the Joint Filing call for inclusion of the results of the Market Potential Study in the 2013 Annual Update, KCP&L requires three additional months to have adequate time to include the results in its 2013 Annual Update. The second 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. At the time of the Joint Filing, the Staff agreed that to address these issues, KCP&L should request a waiver from these rules.

9. The variances requested herein are consistent with the policy objectives of the Commission's IRP regulations and will result in the submission of data that is more useful to the Commission and other interested parties. This variance request is only intended to apply to

KCP&L's 2013 Annual IRP Update and its corresponding Stakeholder Workshop. If the Company determines that waivers are necessary for subsequent IRP-related submissions, it will seek separate authorization for such waivers at that time.

WHEREFORE, KCP&L respectfully requests that the Commission grant its Application for Variances Concerning the 2013 Integrated Resource Plan Annual Update.

Respectfully submitted,

/s/ Roger W. Steiner

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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 7th day of February, 2013.

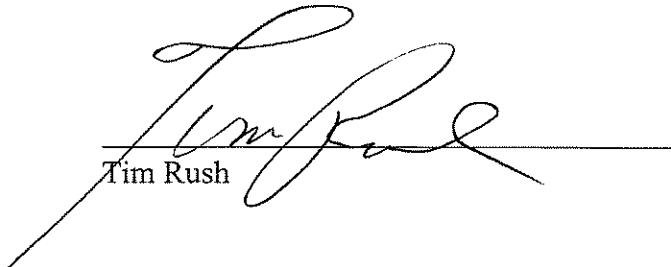
/s/ Roger W. Steiner

Roger W. Steiner

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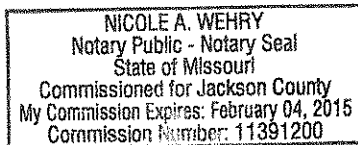
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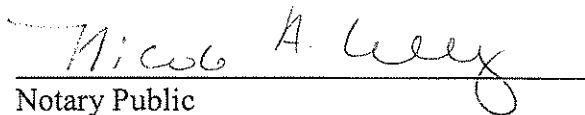
I, Tim Rush, having been duly sworn upon my oath, state that I am the Director of Regulatory Affairs of Kansas City Power & Light Company ("KCP&L"), that I am duly authorized to make this affidavit on behalf of the Applicant, and that the matters and things stated in the foregoing pleading are true and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


Tim Rush

Subscribed and sworn before me this 7th day of February, 2013.

My Commission Expires:




Notary Public