

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

In the Matter of Proposed Rules)	
4 CSR 240-3.162 and)	Case No. EX-2008-0105
4 CSR 240-20.091, Environmental)	
Cost Recovery Mechanisms)	

**KANSAS CITY POWER & LIGHT COMPANY
CONCURRENCE WITH
MISSOURI ENERGY DEVELOPMENT ASSOCIATION COMMENTS**

COMES NOW Kansas City Power & Light Company ("KCPL" or "Company") and files these comments on the proposed rule dated December 3, 2007 and published in the above-captioned docket.

1. KCPL is a corporation organized and existing under and by virtue of the laws of the State of Missouri, with its principal office at 1201 Walnut, Kansas City, Missouri 64106-2124. KCPL's Certificate of Good Standing was provided in Case No. EF-2002-315 and 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.

3. Communications in this matter should be addressed to:

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4. KCPL has reviewed the proposed rules associated with the Electric Utility Environmental Cost Recovery Mechanism (“ECRM”) and concurs with the comments offered by the Missouri Energy Development Association (“MEDA”) on this topic, namely:

- a. The timing of these rules is appropriate given their purpose and the investment needs of the electric utilities in Missouri.
- b. The electric utilities in Missouri are at the beginning of a major infrastructure building period to meet growing demand and to comply with new stricter environmental requirements.
- c. The magnitude and timing of these environmental expenditures highlight the need for a reasonable mechanism to allow for recovery of increasing environmental expenditures between rate cases subject to thorough tracking of cost and assessments of prudence.
- d. A number of changes to these rules are needed to deal with the proposed division of electric utility rate base in calculating ECRM adjustments, particularly the segmentation of rate base into “environmental” and “non-environmental” categories.

5. KCPL further concurs with the Recommended Rule Language Changes offered by MEDA and believes those changes will address the Company’s concerns with the proposed rules and result in a more appropriate rulemaking.

WHEREFORE, KCPL requests that consideration be given to the comments submitted herein.

Respectfully Submitted,

By: /s/ Curtis D. Blanc
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been hand delivered, e-mailed, or mailed, postage prepaid, this 2nd day of January 2008 to counsel of record.

/s/ *Curtis D. Blanc*

Curtis D. Blanc