BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of Kansas City Power & Light Company for Approval to Make Certain Changes in its Charges for Electric Service to Begin the Implementation of Its Regulatory Plan.

Case No.

APPLICATION

Kansas City Power & Light Company ("KCPL" or "Company") files this Application with the Missouri Public Service Commission ("Commission") for the purpose of making changes to KCPL's charges for electric service, pursuant to 4 CSR 240-2.060(1), 4 CSR 240-3.030 and 4 CSR 240-3.160.¹ KCPL respectfully requests that the proposed rate changes become effective in accordance with the statute and regulation, and in support of such request, KCPL states the following:

1. KCPL is a Missouri corporation, in good standing in all respects, with its principal office and place of business at 1201 Walnut Street, Kansas City, Missouri 64106-2124. KCPL is engaged in the generation, transmission, distribution and sale of electricity in western Missouri and eastern Kansas, operating primarily in the Kansas City metropolitan area. KCPL is an "electrical corporation" and "public utility" as those terms are defined in Section 386.020 and, as such, is subject to the jurisdiction of the Commission as provided by law. KCPL's Certificate of Good Standing was filed in Case No. EM-2000-753 and is incorporated herein by reference.

¹ Pursuant to 4 CSR 240-3.160(1)(A), the Company is not required to submit the information included in this section with this filing because the Commission Staff has received a depreciation study, database and property unit catalog from the Company within the three years prior to the Company filing for this general increase. The depreciation and amortization rates used in the preparation of this filing are found in Appendix G-1 through G-3 of the Regulatory Plan Stipulation and Agreement in Case No. EO-2005-0329.

2. KCP&L sells electricity at retail to approximately 267,000 customers in Missouri

and 224,000 in Kansas. It owns 1,754 miles of high-voltage power lines and 4,041 megawatts of

base, intermediate and peak load generating capacity

3. All correspondence, pleadings, orders, decisions, and communications regarding

this proceeding should be sent to:

William G. Riggins Vice President and General Counsel Kansas City Power & Light Company 1201 Walnut Kansas City, MO 64106-2124 Telephone: (816) 556-2785 Facsimile: (816) 556-2787 E-mail: bill.riggins@kcpl.com

Chris B. Giles Vice President, Regulatory Affairs Kansas City Power & Light Company 1201 Walnut Kansas City, MO 64106-2124 Telephone: (816) 556-2912 Facsimile: (816) 556-2924 E-mail: chris.giles@kcpl.com

James M. Fischer Fischer & Dority, P.C. 101 Madison Street, Suite 400 Jefferson City, MO 65101 Telephone: (573) 636-6758 Facsimile: (573) 636-0383 E-mail: jfischerpc@aol.com

Karl Zobrist Sonnenschein Nath & Rosenthal, LLP 4520 Main Street, Suite 1100 Kansas City, Missouri 64111 Telephone: (816) 460-2545 Facsimile: (816) 531-7545 E-mail: kzobrist@sonnenschein.com 4. KCPL has no 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 the Application.

 KCPL has no annual reports or regulatory assessment fees that are overdue in Missouri.

6. With this Application, KCPL hopes to continue the collaborative process and take constructive steps toward fulfillment of the obligations and commitments that were made by KCPL in Case No. EO-2005-0329 (the "0329 Case"), which recently culminated in the approval of a Stipulation and Agreement (the "Stipulation") by the Commission.

7. In the 0329 Case, the Commission, KCPL and various other interested parties conducted an extensive investigation into the supply, delivery and pricing of electric service to be provided by KCPL into the future. The 0329 Case resulted in a commitment by KCPL to make substantial investments in its electric infrastructure over the next five years, which will cost over \$1.3 billion, and which will enable KCPL to meet the projected future energy demands of KCPL's customers in an environmentally responsible manner, including the addition of wind-powered generation, the installation of pollution control equipment at existing power plants, the institution of programs designed to help conserve energy consumption (demand response and energy efficiency) and the construction of a new coal-fired power plant, all as contemplated in the resource plan (the "Resource Plan")² as contained in the Stipulation which was approved by the Commission in the 0329 Case.³

² The Resource Plan is defined in the Stipulation as "the capital investments and customer programs contained in this Agreement, as more fully described in Paragraph III.B.4 "Timely Infrastructure Investments" and Paragraph III.B.5 "Demand Response, Efficiency, and Affordability Programs.""

³ The 0329 Case was preceded by Case Nos. EO-2004-0577 and EW-2004-0596 which involved workshops, discovery, studies, modeling and discussions concerning historical peak loads, forecasted growth, various supply options, reliability issues, costs and financing, and other related topics. The process was complex and involved

8. In accordance with the Stipulation that was approved in the 0329 Case, KCPL committed to file this rate Application on February 1, 2006. This rate Application is the first in a series of rate applications that are contemplated in the Rate Plan (Section III.B.3 of the Stipulation), in conjunction with KCPL's implementation of the Resource Plan.⁴ Under the Rate Plan, KCPL will file as many as three, and at least one, additional rate Applications over the next four years, as described in Section III.B.3 of the Stipulation.

9. Because the Resource Plan involves major capital expenditures by KCPL during an intensive period of construction over the next five years, the Rate Plan was structured to incrementally address the rate treatment for such additions and improvements. This initial rate Application pursuant to the Rate Plan will also reflect KCPL's investment in plant and equipment since the last time KCPL's rate base was adjusted.

10. The incremental series of rate cases will also ameliorate the inherent strain that is typically placed on bond ratings of utilities that undertake major capital outlays, such as those required by the Resource Plan. By taking appropriate steps to protect and maintain the investment grade rating of such bonds, which KCPL has worked diligently to establish, the Rate Plan attempts to preserve a lower cost of debt, which will thereby decrease the overall cost of service and result in lower customer rates than would otherwise occur over the useful life of the newly constructed improvements.

numerous interactions between KCPL and many organizations in Missouri and Kansas responsible for protecting utility ratepayers, the environment and the public interest. These organizations include the Missouri Public Service Commission Staff ("Staff"), Office of the Public Counsel ("Public Counsel"), the Missouri Department of Natural Resources ("MDNR"), the City of Kansas City, Missouri ("KCMO"), United States Department of Energy ("DOE"), Concerned Citizens of Platte County ("CCPC"), Sierra Club, PraxAir, Inc., Ford Motor Company, Missouri Industrial Energy Consumers ("MIEC") and several public utilities, among others.

⁴ The stipulation refers collectively to "An Experimental Regulatory Plan" that is comprised of a Rate Plan, set forth in Section III.B.3, the Demand Response, Efficiency and Affordability Programs set forth in Section III.B.5, and the Resource Plan as defined above. References to the "Regulatory Plan" within this Application shall have the same meaning.

11. KCPL and its customers have benefited greatly from prudent management practices that have avoided many of the difficulties experienced by other regulated energy companies during the last decade. Such practices have enabled KCPL to maintain its debt at investment grade level since its last rate adjustment, and even prior to that time, which has significantly benefited customers whose cost of service has included a lower cost of financing KCPL's operations.

12. This accomplishment, however, will become increasingly challenging to maintain as KCPL implements the Regulatory Plan, while at the same time facing the ongoing challenges of volatile energy markets for off-system sales and purchases, higher fuel prices, rising costs of debt, increased coordination of regional transmission facilities, escalating labor and pension costs, as well as many other challenges. This is particularly true in light of the fact that customer rates have not been increased since 1988 and have actually decreased during that same time period.

13. Fortunately, in the 0329 Case, the Commission had the foresight to address many of the emerging issues and challenges affecting the supply, delivery and pricing of KCPL's electric service into the future. During this proceeding, KCPL hopes and intends to continue the collaborative, cooperative process that was promoted by the Commission in the 0329 Case. KCPL is confident that the Commission and other parties to this case will conclude that the best way for KCPL to meet the challenges of providing sufficient and efficient electric service in the future is to have rates that are fair and that recognize that KCPL is undertaking responsible steps to implement the Regulatory Plan that was approved in the 0329 Case.

14. This Application and the attached schedules and testimony filed on behalf of KCPL in this proceeding reflect not only historical data and analyses concerning KCPL's

operations, based on a 2005 calendar test year,⁵ they also lay the foundation for implementing the Regulatory Plan and providing power into the future, in accordance with the 0329 Case, which requires responsible and complex forward planning.

15. Among the forward-looking features of the proposed tariffs that are being submitted by KCPL simultaneously with this Application, is new investment in plant that is anticipated to be in service by December 31, 2006, as contemplated by the Stipulation that was approved by the Commission in the 0329 Case. These new investments in plant are in addition to various investments in generation capacity that have been made by KCPL in recent years, as described in the direct testimony of KCPL witnesses Dana Crawford, Chris Giles and John Grimwade.

16. KCPL's rates were last adjusted in Case No. ER-99-313 by an Order of the Commission that was issued on April 13, 1999, which resulted in a decrease of \$15 million in KCPL's retail jurisdictional rates in Missouri. Since that time, KCPL has undertaken substantial additional investment in rate base. KCPL's costs of operation, maintenance and fuel have also increased. In particular, fuel, transportation and pension costs have increased. These additional investments in plant and expenses have resulted in a revenue deficiency.

17. In 2006, pursuant to the Resources Plan, KCPL is adding 100 MW of wind-powered generation as well as adding a number of customer programs including Demand Response, Efficiency and Affordability Programs as set forth in Section III.B.5 of the Stipulation and additional investment in distribution and transmission facilities for automation and asset management.

⁵ Pursuant to the Stipulation, KCPL has initially filed test year data with nine (9) month actual and three (3) month budget data updated to reflect known and measurable changes through September 30, 2006. The test year data will be updated with actual data in the update and true-up process of this case.

18. The schedules filed with this Application establish a gross revenue deficiency of \$57 million, based upon normalized operating results for the 12 months ending December 31, 2005, adjusted for known and measurable changes in revenues, operating and maintenance expenses, cost of capital and taxes, and the other adjustments referred to herein. This represents a rate increase of approximately 11.5% based on test year revenue of approximately \$487 million. Tariffs reflecting the proposed rate increases are being filed simultaneously with this Application.

19. KCPL is requesting a minimum return on equity ("ROE") of 11.5% based upon a capital structure of 53.81% equity in this rate Application. The proposed ROE is described in the direct testimony of KCPL witnesses Terry Bassham, Sam Hadaway and Chris Giles.

20. As more fully discussed in the testimony of Mr. Bassham, KCPL requests Commission approval of the following accounting as part of this rate proceeding:

A. <u>Wolf Creek Decommissioning Trust Fund Accrual</u>. It is not evident how the Internal Revenue Service will implement revised Section 468A of the Internal Revenue Code regarding favorable tax treatment of tax-qualified nuclear decommissioning trust funds. As a result, the Company requests that the Commission use the same language in the order in this rate proceeding approving the decommissioning funding level that was required prior to the changes to Section 468A. The required language prior to the changes to Section 468A included a statement in an order of the state commission (1) approving the schedule of decommissioning cost accruals; (2) finding that the decommissioning cost accruals were included in cost of service and were included in rates for ratemaking purposes; and (3) finding that the

earnings rate assumed for the trust takes into consideration the tax rate change and the removal of the investment restrictions resulting from the Energy Policy Act of 1992.

B. <u>Pensions</u>. KCPL requests that the Commission reaffirm its approval of the regulatory asset or liability which the Company records for the annual difference in Statement of Financial Accounting Standards No. 87 ("FAS 87") pension expense recorded for financial reporting purposes and the amount of FAS 87 pension expense calculated for ratemaking purposes, as addressed in Section III.B.1.e.1 of the Stipulation. The Stipulation provided no rate base recognition for this regulatory asset or liability. As indicated in the Stipulation, any difference between the two methods is merely a timing difference that will eventually be recovered, or refunded, through rates under the method used in setting rates over the life of the pension plans.

KCPL requests that the Commission reaffirm its approval of the regulatory asset or liability the Company records for the annual difference in FAS 87 pension expense calculated for ratemaking purposes and the level of pension expense built into rates for that period, as addressed in Section III.B.1.e.6 of the Stipulation which provided rate base recognition for this regulatory asset or liability.

Unlike FAS 87, which allows for the delayed recognition in net periodic pension cost of certain gains and losses, FAS 88 requires immediate recognition of certain gains and losses arising from settlements and curtailments of defined benefit plans. KCPL requests Commission approval to set up a regulatory asset or liability to track the difference in FAS 88 pension expense recorded for financial reporting purposes. The regulatory asset or liability would be applied as of the first day of the calendar year in

which the rate and order are issued in this case and would be included in rate base and amortized over five (5) years at the next rate case.

21. The proposed revenues in this Application are just and reasonable, and necessary to assure continuing, adequate, efficient and reliable utility service, and to maintain the financial integrity of KCPL during the upcoming period of major construction to implement the Regulatory Plan, as approved by the Commission in the 0329 Case.

22. KCPL has also filed a class cost of service study and proposed rate design to be determined in this proceeding.

23. The testimony of 21 witnesses and schedules are filed in support of this Application. The names of the witnesses and the subject of each witness' testimony are as follows:

Witness	Subject Matter
William H. Downey	Overview and Policy
Chris B. Giles	Overview and Summary of KCPL's Regulatory Plans and Rate Request
Terry Bassham	Financial
John R. Marshall	Delivery Business Plan Asset Management Plan
F. Dana Crawford	Generation Business Plan In-Service Criteria for Certain Existing Plant Maintenance Normalization
John R. Grimwade	Resource Plan Update on Wind Project, Environmental Upgrades, and Iatan Unit 2 In-Service Criteria for Wind Project, Environmental Upgrades, and Iatan Unit 2

Tim M. Rush	Class Cost of Service Study Tariffs Rules and Regulations
Don A. Frerking	Revenue Requirement Schedules Wolf Creek Decommissioning
Lori A. Wright	Accounting Adjustments Pensions
Philip M. Burright	Taxes
Wm. Edward Blunk	Fuel Costs Fuel Inventory SO ₂ Emission Allowance Plan
Susan K. Nathan	Affordability, Energy Efficiency and Demand Response Programs Critical Peak Pricing Credit Card and Debit Card Payments
Burton L. Crawford	Prudence of Capital Investments in Plant Fuel Expense Purchased Power
Michael M. Schnitzer	Risk from Off-System Sales
Samuel C. Hadaway	Return on Equity/Capital Structure
Robert J. Camfield	KCPL Performance and Productivity
Michael W. Cline	Financial Modeling Accounts Receivables
George M. McCollister	Weather Normalization and Customer Annualization
Lois J. Liechti	Class Cost of Service Study Retail Revenues
Christine M. Davidson	Cash Working Capital
Laura Becker	Load Research

24. Pursuant to 4 CSR 240-3.030, the following "Minimum Filing Requirements" information is attached: (a) the amount of dollars of the aggregate annual increase and the percentage of increase over current revenues which the tariffs propose; (b) names of counties and communities affected; (c) the number of customers to be affected in each general category of service and in all rate classifications within each general category of service; (d) the average change requested in dollars and percentage change from current rates for each general category of service and for all rate classifications within each general category of service; (e) the proposed annual aggregate change by general categories of service and by rate classification within each general category of service; for each general category of service including dollar amounts and percentage of change in revenues from current rates; (f) copies of any press releases relative to the filing issued by the company at the time of filing; and (g) a summary of the reasons for the proposed changes in the rates and tariffs.

25. KCPL has attempted to keep the amount of confidential material in this filing to a minimum. However, some proprietary and highly confidential information is included in the testimony being filed with this Application. The proprietary and highly confidential information, which has been redacted from the public version of the testimony, falls into four broad categories: (a) information concerning KCPL's activities in wholesale power markets; (b) information concerning KCPL's activities in SO₂ emission allowance markets; (c) highly sensitive financial information; and (d) highly sensitive, forward-looking information concerning KCPL's strategic plans. The public disclosure of such information would adversely impact the financial interests of KCPL. Pursuant to 4 CSR 240-2.085, KCPL is filing a Motion For Protective Order simultaneously with the filing of this Application.

WHEREFORE, KCPL respectfully requests that the Commission approve the proposed rate schedules and tariffs for electric service, order that they become effective as proposed, approve the accounting requested herein, and grant such other and further relief as it deems just and reasonable.

Respectfully submitted,

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Karl Zobrist, MBN 28325 Sonnenschein Nath & Rosenthal LLP 4520 Main Street, Suite 1100 Kansas City, MO 64111 Telephone: (816) 460-2545 Facsimile: (816) 531-7545 email: <u>kzobrist@sonnenschein.com</u>

Attorneys for Kansas City Power & Light Company

VERIFICATION

State of Missouri)	
)	ss:
County of Jackson)	

William H. Downey, being duly sworn upon his oath deposes and says that he is Chief Executive Officer and President, of Kansas City Power & Light Company; that he is familiar with the foregoing Application; and that the statements therein are true and correct to the best of his knowledge and belief.

William H. Downey Chief Executive Officer and President Kansas City Power & Light Company

SUBSCRIBED AND SWORN to before me this $\underline{30}^{\circ}$ day of January 2006.

Nicolo A- Wery Notary Public

My Appointment Expires

NICOLE A. WEHRY Notary Public - Notary Seal STATE OF MISSOURI Jackson County My Commission Expires: Feb. 4, 2007

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing Application has been hand delivered, emailed or mailed, First Class mail, postage prepaid, this 1st day of February, 2006, to the signatories to the Stipulation and Agreement in Case No. EO-2005-0329, pursuant to the terms of that agreement.

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Curtis D. Blanc

Kansas City Power & Light Company <u>PSC Mo. No. 7, Electric Rates</u> <u>Effective January 1, 2007</u>

6th Revision Sheet No. TOC-1 3rd Revision Sheet No. 5A 3rd Revision Sheet No. 5B 3rd Revision Sheet No. 8 2nd Revision Sheet No. 8A 2nd Revision Sheet No. 9 3rd Revision Sheet No. 9A 3rd Revision Sheet No. 9B 2nd Revision Sheet No. 9C 2nd Revision Sheet No. 9D Sheet No. 9E 1st Revision Sheet No. 10 2nd Revision 3rd Revision Sheet No. 10A 3rd Revision Sheet No. 10B 3rd Revision Sheet No. 10C 2nd Revision Sheet No. 10D Sheet No. 10E 1st Revision 2nd Revision Sheet No. 11 3rd Revision Sheet No. 11A 3rd Revision Sheet No. 11B 3rd Revision Sheet No. 11C 2nd Revision Sheet No. 11D 1st Revision Sheet No. 11E 3rd Revision Sheet No. 14A 3rd Revision Sheet No. 14B Sheet No. 14C 3rd Revision 1st Revision Sheet No. 14E 2nd Revision Sheet No. 17 3rd Revision Sheet No. 17A 2nd Revision Sheet No. 17B 2nd Revision Sheet No. 17C 1st Revision Sheet No. 17D Sheet No. 18 2nd Revision 3rd Revision Sheet No. 18A 3rd Revision Sheet No. 18B 3rd Revision Sheet No. 18C 2nd Revision Sheet No. 18D 1st Revision Sheet No. 18E 2nd Revision Sheet No. 19 3rd Revision Sheet No. 19A 3rd Revision Sheet No. 19B

Sheet No. 19C	3 rd Revision
Sheet No. 19D	1 st Revision
Sheet No. 20C	3 rd Revision
Sheet No. 28B	2 nd Revision
Sheet No. 30	3 rd Revision
Sheet No. 33	3 rd Revision
Sheet No. 33A	1 st Revision
Sheet No. 33B	1 st Revision
Sheet No. 35	3 rd Revision
Sheet No. 35A	3 rd Revision
Sheet No. 35B	3 rd Revision
Sheet No. 35C	3 rd Revision
Sheet No. 35D	3 rd Revision
Sheet No. 36	3 rd Revision
Sheet No. 36A	3 rd Revision
Sheet No. 36B	3 rd Revision
Sheet No. 37	3 rd Revision
Sheet No. 37A	3 rd Revision
Sheet No. 37B	3 rd Revision
Sheet No. 37C	3 rd Revision
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Sheet No. 37E	3 rd Revision
Sheet No. 37F	3 rd Revision
Sheet No. 37G	3 rd Revision
Sheet No. 45	3 rd Revision
Sheet No. 45A	3 rd Revision

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Kansas City Power & Light Company PSC Mo. No. 2, Rules and Regulations Effective January 1, 2007

Sheet No. 1.01 Sheet No. 1.02	1 st Revision 3 rd Revision
Sheet No. 1.04	11 th Revision
Sheet No. 1.07	3 rd Revision
Sheet No. 1.07A	Original
Sheet No. 1.08	3 rd Revision
Sheet No. 1.09A	2 nd Revision
Sheet No. 1.11	4 th Revision
Sheet No. 1.14	6 th Revision
Sheet No. 1.26	8 th Revision
Sheet No. 1.28	2 nd Revision
Sheet No. 1.31	4 th Revision
Sheet No. 1.32	3 rd Revision

er & Light Company	Summary - Missouri
Kansas City Power 8	Retail Revenue S

4 CSR 240-3.030 (3) (B) 1 4 CSR 240-3.030 (3) (B) 3 4 CSR 240-3.030 (3) (B) 4 4 CSR 240-3.030 (3) (B) 4 4 CSR 240-3.030 (3) (B) 5

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Changes to	
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Year	
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			September 30, 2006	30, 2006									•
Line No.	le Classification	Average Number of Customers	Base MWH	Base Revenue	Average Price le per kWh		Proposed Revenue	Proposed Price per KWh	Proposed Revenue Increase	Proposed / Percent Increase	Proposed Average Monthly Increase per Customer	Proposed Increase per kWh	Average Monthly kWh Usage per Customer
*	Residential	235,206	2,530,518 \$	172,526	,021 \$ 0.06818	ŝ	192,439,211	\$ 0.07605 \$	19,913,191	11.54%	\$ 7.06	\$ 0.00787	897
0	Small General Service	25,935	461,331	\$ 36,740,5	508 \$ 0.07964	\$	40,955,670	\$ 0.08878 \$	4,215,161	11.47%	\$ 13.54	\$ 0.00914	1,482
r)	Medium General Service	4,675	992,685	\$ 62,681,149	49 \$ 0.06314	\$	69,863,486	\$ 0.07038 \$	7,182,338	11.46%	\$ 128.03	\$ 0.00724	17,696
4	Large General Service	1,110	2,170,114 \$	110,118	,750 \$ 0.05074	÷	122,758,600	\$ 0.05657 \$	12,639,850	11.48%	\$ 949.17	\$ 0.00582	162,961
ŝ	Large Power Service	93	2,328,366	\$ 98,655,8	,828 \$ 0.04237	\$	109,791,823	\$ 0.04715 \$	11,135,994	11.29%	\$ 10,007.09	\$ 0.00478	2,092,330
9	Other (Lighting and Traffic Signals)	3,596	86,651	\$ 6,246,7	,770 \$ 0.07209	÷	6,962,498	\$ 0.08035 \$	715,728	11.46%	\$ 16.59	\$ 0.00826	2,008
7	EDR Credits			\$ (466,3	386)	÷	(519,834)	\$	(53,448)				
8	Subtotal Retail (Billed)	270,614	8,569,665	\$ 486,502,6	,640 \$ 0.05677	\$	542,251,454	\$ 0.06328 \$	55,748,814	11.46%	\$ 17.17 \$	\$ 0.00651	2,639
6	Unbilled and Adjustments	(3,540) (1)		\$ 511,7	209	ŝ	562,895	\$	51,186				
4	10 Total Retail (Accrued) ==	267,074	8,569,665 \$	487,014	349	\$	542,814,349	\$	55,800,000				

(1) Area Lights not included in total customer count.

Page 1 of 2

Kar Ret	isas City F ail Revenu	Kansas City Power & Light Company Retail Revenue - Missouri										4 4 4	4 CSR-240-3.030 (3) (B) 3 4 CSR-240-3.030 (3) (B) 4 4 CSR-240-3.030 (3) (B) 5	90 (3) (B) 3 90 (3) (B) 4 90 (3) (B) 5
			2005 Test Yea	2005 Test Year Including Known & Measurable Changes to September 30, 2006	uding Known & Measu September 30, 2006	rable Chang	jes to							
N. N.	n Class / Tariff	Tariff Description	Average Number of Customers	Base MWH	Base Revenue		Average Price per kWh P	Proposed Revenue	Proposed Price per kWh	Proposed Revenue Increase	Proposed Percent Increase	Average Monthly Increase per Customer	Proposed Increase per kWh	Average Monthly kWh Usage per Customer
- 01 00 4 10	Residentia RESA RESB RESC RESC RTOD	al Residential General Use Residential Space Heat - Orne Meter Residential Space Heat - Two Meter Residential Time Of Day	199,240 24,918 10,998 50	2,012,474 350,021 167,262 761	<pre>\$ 142,806,933 \$ 20,427,918 \$ 9,242,624 \$ 48,546</pre>	06,933 \$ 27,918 \$ 42,624 \$	0.07096 0.05836 0.05526 0.06380	\$ 158,679,977 \$ 23,066,174 \$ 10,636,171 \$ 56,889	 \$ 0.07885 \$ 0.06590 \$ 0.06359 \$ 0.07477 	\$ 15,873,044 \$ 2,638,256 \$ 1,393,547 \$ 8,343	11.12% 11.12% 15.08% 17.19%	\$ 6.64 \$ 8.82 \$ 10.56 \$ 14.03	\$ 0.00789 \$ 0.00754 \$ 0.00833 \$ 0.01097	842 1,171 1,267
9 ~ 8 6 9	Small Gen SGSSA SGSSA SGSSA SGSSA SGSSU	Small General Service SGSS Small General Secondary SGSSA Small General Secondary All Electric SGSSH Small General Secondary Separate Heat Meter SGSSU Small General Secondary Unmetered	23,709 575 366 1,254	421,850 19,003 9,650 9,672	\$ 33,975,491 \$ 1,278,348 \$ 735,345 \$ 646,428	491 \$ 348 \$ 345 \$ 428 \$	08054 06727 07620 06684	\$ 37,845,313 \$ 1,457,156 \$ 816,619 \$ 720,834	~ ~ ~ ~ ~ ~ ~	\$ 3,869,823 \$ 178,808 \$ 81,273 \$ 74,406		\$ 13.60 \$ 25.90 \$ 4.94 \$ 94	\$ 0.00917 \$ 0.00917 \$ 0.00842 \$ 0.00769	1,483 2,153 2,197 642
E 62 62 2	SGSPA SGSPA SGSPU SGSPU	Small General Primary Small General Primary All Electric Small General Primary Separate Heat Mater Small General Primary Unmetered	8	1,156 - 	\$ 104,896 \$ 104,896 \$				\$ 0.10016 \$ \$ \$	\$ \$ 10,852 * * * *	0.00% 0.00% 0.00%	\$ \$ 30.48	*	3,240
21 20 41 41 41 41 41 41 41 41 41 41 41 41 41	Medium G MGSS MGSSA MGSSH MGSPA MGSPA MGSPA	Medium General Service MGSS Medium General Secondary MGSSA Medium General Secondary All Electric MGSSA Medium General Secondary Separate Heat Meter MGSP Medium General Primary MGSPH Medium General Primary All Electric MGSPH Medium General Primary Separate Heat Meter	4,081 440 128 23 - 2	820,896 134,529 28,041 7,596 1,624	\$ 53,312,163 \$ 7,103,293 \$ 1,709,747 \$ 465,512 \$ 90,433 \$ -	12,163 \$ 103,293 \$ 109,747 \$ 165,512 \$ 90,433 \$	0.06494 0.05280 0.06097 0.06129 0.05568	\$ 59,299,403 \$ 69,299,403 \$ 8,045,725 \$ 1,901,861 \$ 516,848 \$ 99,648 \$ -	\$ 0.07224 \$ 0.05981 \$ 0.06783 \$ 0.06805 \$ 0.06805 \$ 0.06135	\$ 5,987,240 \$ 942,432 \$ 192,115 \$ 51,336 \$ 9,215 \$ -	0 11.23% 13.27% 11.24% 11.03% 10.19% 0.00%	\$ 122.25 \$ 178.44 \$ 125.06 \$ 183.22 \$ 380.92 \$ -	\$ 0.00729 \$ 0.00701 \$ 0.00685 \$ 0.00686 \$ 0.00676 \$ 0.00567	16,761 25,472 18,254 27,108 67,141
838888	Large Gen LGSS LGSSA LGSSA LGSSA LGSSA LGSPA LGSPA LGSPA	Large General Service LGSS Large General Secondary LGSS Large General Secondary All Electric LGSSH Large General Secondary Separate Heat Meter LGSP Large General Primary LGSP Large General Primary All Electric LGSPH Large General Primary Separate Heat Meter	763 218 48 72 8	1,113,198 714,355 76,704 189,633 76,224	\$ 60,768,793 \$ 32,287,089 \$ 4,024,695 \$ 9,955,838 \$ 3,082,336 \$ -	- - - - - - - - - - - - - - - - - - -	0.05459 0.04520 0.05247 0.05247 0.05250 0.04044 0.04044	 67,180,425 63,637,852 4,455,566 10,990,840 3,493,917 3,493,917 	 \$ 0.06035 \$ 0.05129 \$ 0.05809 \$ 0.05796 \$ 0.04584 \$ 0.04584 	\$ 6,411,633 \$ 4,350,763 \$ 4,350,763 \$ 430,871 \$ 1,035,002 \$ 411,582 \$ -	10.55% 13.48% 10.71% 13.35% 13.35% 0.00%	\$ 700.28 \$ 1,661.18 \$ 741.91 \$ 1,200.05 \$ 4,170.81	\$ 0.00576 \$ 0.00609 \$ 0.00609 \$ 0.00562 \$ 0.00544 \$ 0.00540 \$ -	121,584 272,751 132,075 219,873 772,420
8 4 8 8 3 9 8	Large Power LPGSS L LPGSSO L LPGSSS L LPGSSS L LPGSP L LPGSP L	ver Service Large Power General Secondary Large Power General Secondary Off Peak Large Power General Substation Large Power General Primary Large Power General Primary Large Power General Primary Off Peak	33 47 10 10	310,531 566,779 82,729 992,367 375,960	\$ 14,920,722 \$ 22,232,673 \$ 3,596,222 \$ 42,864,114 \$ 15,042,097	722 \$ 673 \$ 114 \$ 097 \$	0.04805 - 0.03923 0.04347 0.04319 0.04001	\$ 16,635,773 \$ 16,635,773 \$ 24,645,619 \$ 3,998,263 \$ 47,777,082 \$ 16,735,086	 \$ 0.05357 \$ 0.05357 \$ 0.04348 \$ 0.04833 \$ 0.04814 \$ 0.04451 	\$ 1,715,051 \$ 1,715,051 \$ 2,412,946 \$ 4,912,968 \$ 1,692,989	11.49% 0.00% 11.18% 11.18% 11.46%	\$ 4,609.89 \$ - \$ 49,779.46 \$ 33,970.17 \$ 8,744.08 \$ 14,274.42	 \$ 0.00552 \$ 0.00552 \$ 0.00426 \$ 0.00496 \$ 0.00450 	834,676 - 6,992,745 6,990,153 1,766,211 3,169,904
37 37 39 39 40 41	Other (Lig) ALC ALR CON MLC, MLI, MLM, MLS TSL	Other (Lighting and Traffic Signals) ALC Commercial Area Lights ALR Residential Area Lights CON Comercial Secondary Special Contract CML, Street Lighting Public (Municipal Lighting Customer MLM, MLS Owned, Incan, Mercury, Sodium) TSL MO Traffic Signal	2,394 1,146 53 2	13,182 1,068 4,985 67,333	 \$ 1,596,066 \$ 227,740 \$ 199,418 \$ 4,188,105 \$ 35,441 	306,066 \$ 227,740 \$ 199,418 \$ 188,105 \$ 35,441 \$	0.12108 0.21330 0.04000 0.06220 0.43083	 \$ 1,778,936 \$ 253,833 \$ 222,266 \$ 4,667,960 \$ 39,502 	 \$ 0.13495 \$ 0.23774 \$ 0.04458 \$ 0.06933 \$ 0.48019 	\$ 182,870 \$ 26,093 \$ 22,848 \$ 479,855 \$ 4,061	11.46% 11.46% 11.46% 11.46% 11.46%	\$ 6.37 \$ 1.90 \$ 1,904.04 \$ 754.49 \$ 169.19	 \$ 0.01387 \$ 0.01387 \$ 0.02444 \$ 0.00458 \$ 0.00713 \$ 0.04936 	459 78 415,455 105,870 3,428
4 4 4 4	EDR Credits Subtotal Ret Unbilled and	EDR Credits Subtotal Retail (Billed) Unbilied and Adlustments	270,614 (3.540) (1)	8,569,665	\$ (466,386) \$ 486,502,640 \$ 511,709	386) 640 \$ 709	0.05677	\$ (519,834) \$ 542,251,454 \$ 562,895	\$ 0.06328	\$ (53,448) \$ 55,748,814 \$ 51,186	3) 4 11.46%	\$ 17.17	\$ 0.00651	2,639
45	Total Reta	Total Retail (Accrued)		8,569,665	\$ 487,014,349	349		542,		55,8				

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(1) Area Lights not included in total customer count.

Kansas City Power & Light Company General Information

Missouri Counties

Carroll
 Cass
 Chariton
 Clay
 Howard
 Jackson
 Johnson
 Lafayette
 Livingston
 Pettis
 Platte
 Randolph
 Saline

Missouri Communities

1 Alma 2 Armstrong **3 Arrow Rock** 4 Aullville 5 Avondale 6 Belton 7 Birmingham 8 Blackburn 9 Blue Springs **10 Blue Summit** 11 Bogard 12 Bosworth 13 Brunswick 14 Buckner 15 Carrollton 16 Claycomo 17 Cleveland 18 Clifton Hill 19 Concordia 20 Corder 21 Dalton 22 Dawn 23 DeWitt 24 Drexel 25 Emma 26 Gilliam 27 Gladstone 28 Glasgow 29 Grain Vallev 30 Grand Pass 31 Grandview 32 Higginsville 33 Houston Lake 34 Houstonia 35 Independence 36 Kansas City 37 Keytesville 38 Lake Waukomis

39 LaMonte 40 Liberty 41 Malta Bend 42 Marceline 43 Marshall 44 Martin City 45 Mayview 46 Mendon 47 Miami 48 Mount Leonard 49 Napton 50 Norborne 51 North Kansas City 52 Northmoor 53 Oaks 54 Oakview 55 Oakwood 56 Oakwood Park 57 Parkville 58 Peculiar 59 Platte Woods 60 Pleasant Valley 61 Randolph 62 Raytown 63 Riverside 64 Salisbury 65 Sibley 66 Slater 67 Sugar Creek 68 Sumner **69 Sweet Springs** 70 Tina 71 Triplett 72 Wakenda 73 Waldron 74 Waverly 75 Weatherby Lake 76 West Line

Kansas City Power & Light Company Summary of Reasons For Filing the Application

Kansas City Power & Light Company ("KCPL"), a subsidiary of Great Plains Energy, Inc., files this Application with the Missouri Public Service Commission ("Commission"), and requests approval to increase rates for electric service for the first time in 20 years. This rate Application is the first in a series of rate applications contemplated in the Regulatory Plan set forth in the Stipulation and Agreement ("Stipulation") that the Commission approved in Case No. EO-2005-0329.

KCPL's rates were last adjusted in Case No. ER-99-313 by an order of the Commission that was issued on April 13, 1999, which resulted in a decrease of \$15.0 million in KCPL's retail jurisdictional rates in Missouri. Since that time, KCPL has undertaken substantial additional investment in rate base. In 2006, as part of KCPL's Comprehensive Energy Plan to provide clean, affordable energy for generations to come, KCPL is (1) adding 100 MW of renewable wind generation, (2) investing in a number of customer programs, including Demand Response, Energy Efficiency and Affordability Programs, and (3) investing in distribution and transmission facilities for improved reliability. These new investments in plant are in addition to various investments in generation capacity that KCPL has made in recent years.

KCPL's operating costs have also increased. In particular, fuel and fuel transportation costs and pension costs, as well as other operating expenses, have increased. Improved operating efficiencies and revenues from wholesale sales can no longer offset these rising operating costs for fuel and materials.

These additional investments in plant and increasing operating costs have resulted in a revenue deficiency.

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FOR IMMEDIATE RELEASE

KANSAS CITY POWER & LIGHT FILES RATE REQUESTS SUPPORTING COMPREHENSIVE ENERGY PLAN

Rates would increase for the first time in 20 years

Kansas City, MO (Feb. 1, 2006) – Kansas City Power & Light (KCP&L), a subsidiary of Great Plains Energy (NYSE: GXP), today filed requests with the Missouri Public Service Commission (MPSC) and the Kansas Corporation Commission (KCC) to increase rates for electric service for the first time in 20 years. The requested increases would add approximately \$7 to a typical Missouri residential customer's average monthly bill and about \$8 to a typical Kansas residential customer's monthly bill.

The timing of these requests was established in the Stipulations and Agreements regarding KCP&L's Comprehensive Energy Plan that were approved by the KCC and MPSC last year.

"This is the next step in the implementation of KCP&L's Comprehensive Energy Plan, which is designed to provide affordable, reliable and clean energy to meet growing demand in the Kansas City area," said Michael Chesser, Great Plains Energy Chairman and CEO. "The Plan is the result of an 18-month, highly collaborative process involving customers, regulators, communities and environmentalists. A key component of our plan includes working intimately with customers in implementing programs and deploying technology that increase efficiency and help customers manage their energy costs."

The Plan takes a balanced approach to meet the energy needs of the community through the construction of a new coal-fired generating plant, a new wind-powered generating facility, environmental upgrades to existing plants, transmission/infrastructure improvements, and energy efficiency and affordability programs. The rate requests also are designed to recover our current level of costs, including pension plans, fuel and transportation. "KCP&L has not increased rates for electric service in 20 years and has, in fact, decreased rates several times in that period, resulting in current residential prices that are below what consumers paid in 1988," said William Downey, president and chief executive officer of KCP&L. "Even after the proposed increases, residential rates paid by KCP&L customers will still be 17 percent below the current national average for electricity.

"KCP&L has been able to keep rates low over the last 20 years in part by achieving total generation costs in the top 25 percent of utilities nationwide, aggressively managing fuel and transportation costs, and improving efficiencies in our distribution operations, as we became one of the top-ranking utilities in key operational areas," Downey added. "The Kansas City area has experienced solid economic growth and increased demand for electricity during that time. In fact the average residential customer use has increased 43 percent during the past 20 years."

In Missouri, KCP&L is seeking a \$55.8 million or 11.5 percent increase in electric revenues, and in Kansas the company is requesting a \$42.3 million or 10.5 percent increase. KCP&L expects that any rate changes approved by the MPSC and KCC will take effect January 1, 2007. KCP&L intends to continue its collaborative approach during the rate process, which will include public hearings and other opportunities for stakeholder input.

According to forecasts developed by the U.S. Department of Energy and KCP&L, the demand for electricity in the Kansas City area is expected to grow two percent annually over the next 10 years, resulting in a need for more generation capacity. KCP&L's Comprehensive Energy Plan will add about 15 percent to the company's current generation capacity. It also includes KCP&L's first venture into renewable wind energy.

The new coal-fired plant will be located at the Iatan Station site. KCP&L is partnering with other regional utilities in the ownership of this plant, which will be a regional asset designed to provide low-cost energy for the Kansas City region.

"The availability of an economic mix of reliable, affordable, and clean energy is a key factor in economic development and our Comprehensive Energy Plan is expected to make Kansas City an even more attractive place to live and do business," Chesser added. "Several components of the Plan are under way and on schedule. The wind project developer has been selected and

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preliminary site preparation is being done near Spearville, Kansas. The 100 megawatts of wind generation is expected to be in service later this year. Environmental upgrades at the La Cygne Generating Station, which will help the Kansas City area to continue to meet ozone air quality standards, have begun and are targeted to be operational before the 2007 ozone season. Plus, we continue to be a leader in implementing energy conservation and affordability programs, partnering with our customers to manage their energy usage and control costs."

KCP&L's efforts in developing and winning support for its Comprehensive Energy Plan recently were recognized by the Edison Electric Institute, which awarded the company its highest honor for community involvement. The Plan also was endorsed by local labor unions, the Kansas City Area Development Council, as well as numerous local economic development agencies and chambers of commerce. Further information about the Plan and the rate request is available at www.kcpl.com.

Headquartered in Kansas City, Mo., KCP&L (<u>www.kcpl.com</u>) is a leading regulated provider of electricity in the Midwest. KCP&L is a wholly owned subsidiary of Great Plains Energy Incorporated (NYSE: GXP), the holding company for KCP&L and Strategic Energy L.L.C., a competitive electricity supplier.

CERTAIN FORWARD-LOOKING INFORMATION -- Statements made in this release that are not based on historical facts are forward-looking, may involve risks and uncertainties, and are intended to be as of the date when made. In connection with the safe harbor provisions of the Private Securities Litigation Reform Act of 1995, the Company is providing a number of important factors that could cause actual results to differ materially from the provided forward-looking information. These important factors include: future economic conditions in the regional, national and international markets, including but not limited to regional and national wholesale electricity markets; market perception of the energy industry and the Company; changes in business strategy, operations or development plans; effects of current or proposed state and federal legislative and regulatory actions or developments, including, but not limited to, deregulation, re-regulation and restructuring of the electric utility industry and constraints placed on the Company's actions by the Public Utility Holding Company Act of 1935; adverse changes in applicable laws, regulations, rules, principles or practices governing tax, accounting and environmental matters including, but not limited to, air quality: financial market conditions and performance including, but not limited to, changes in interest rates and in availability and cost of capital and the effects on the Company's pension plan assets and costs; credit ratings: inflation rates: effectiveness of risk management policies and procedures and the ability of counterparties to satisfy their contractual commitments; impact of terrorist acts; increased competition including, but not limited to, retail choice in the electric utility industry and the entry of new competitors; ability to carry out marketing and sales plans; weather conditions including weather-related damage; cost, availability, quality and deliverability of fuel; ability to achieve generation planning goals and the occurrence and duration of unplanned generation outages; delays in the anticipated in-service dates of additional generating capacity; nuclear operations; ability to enter new markets successfully and capitalize on growth opportunities in non-regulated businesses; performance of projects undertaken by the Company's nonregulated businesses and the success of efforts to invest in and develop new opportunities; and other risks and uncertainties. Other risk factors are detailed from time to time in the Company's most recent quarterly report on Form 10-Q or annual report on Form 10-K filed with the Securities and Exchange Commission. This list of factors is not all-inclusive because it is not possible to predict all factors.