BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Patricia A. Noonan,)
Complainant,)
V.) Case No. EC-2008-0335
Kansas City Power & Light Company,)
Respondent.)

MOTION OF KANSAS CITY POWER & LIGHT COMPANY FOR EXTENSION OF TIME TO ANSWER TO ALLOW FOR SETTLEMENT DISCUSSIONS

Pursuant to 4 CSR 240-2.080, Kansas City Power & Light Company ("KCPL") hereby submits to the Missouri Public Service Commission ("Commission") KCPL's Motion for Extension of Time to Answer to Allow for Settlement Discussions.

- 1. On April 16, 2008, the Commission issued a Notice of Complaint in the above-captioned case. Pursuant to that notice KCPL's answer to the complaint is due May 16, 2008.
- 2. KCPL has been in contact with Ms. Noonan concerning her complaint and believes it is possible for the parties to negotiate a mutually beneficial settlement that would resolve all matters at issue in this proceeding. To that end, KCPL respectfully requests that the Commission postpone the due date for KCPL's answer to the Complaint to give KCPL and Ms. Noonan an opportunity to settle the matter.
- 3. Specifically, KCPL requests that the Commission extend the deadline to answer the complaint until the earlier of (i) June 13, 2008 or (ii) 15 days from the date on which KCPL or Ms. Noonan notifies the Commission in writing that settlement is not possible.

4. Although KCPL appreciates the Commission's proposal to subject the matters at

issue here to voluntary mediation, KCPL is hopeful that the issues may be resolved to the mutual

benefit of KCPL and Ms. Noonan without further taxing the Commission's resources.

Granting KCPL's Motion serves the public interest because it will give KCPL and

Ms. Noonan an opportunity to negotiate a mutually beneficial settlement without the expense and

inconvenience to both parties of litigation. Moreover, Ms. Noonan will not be prejudiced by the

extension. KCPL will waive any late payment or other related fees potentially due until Ms.

Noonan's complaint is either settled or resolved by the Commission.

For the foregoing reasons, KCPL respectfully requests that the Commission extend the

deadline to answer Ms. Noonan's complaint until the earlier of (i) June 13, 2008 or (ii) 15 days

from the date on which KCPL or Ms. Noonan notifies the Commission in writing that settlement

is not possible.

5.

Respectfully submitted,

|s| Curtis D. Blanc

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Counsel for Kansas City Power & Light Company

Dated: May 13, 2008

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing response was served via e-mail or first class mail, postage pre-paid, on this 13th day of May 2008, upon:

Kevin Thompson Missouri Public Service Commission P.O. Box 360 200 Madison St., Suite 800 Jefferson City, Missouri 65102

Colleen M. Dale Secretary and Chief Regulatory Law Judge Missouri Public Service Commission 200 Madison Street, Suite 100 P.O. Box 360 Jefferson City, Missouri 65102 Lewis Mills Office of Public Counsel P.O. Box 7800 200 Madison St., Suite 640 Jefferson City, Missouri 65102

Patricia Noonan 4120 N.W. 79th Street - #16 Kansas City, Missouri 64151

|s| Curtis D. Blanc