BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Resource Plan of)	
Kansas City Power & Light Company	.)	Case No. EO-2007-0008
Pursuant to 4 CSR 240-22)	

MOTION FOR CONTINUANCE OF THE ON-THE-RECORD PRESENTATION OF THE NON-UNANIMOUS STIPULATION AND AGREEMENT AND MOTION FOR EXPEDITED TREATMENT

COMES NOW Kansas City Power & Light Company ("KCPL") and pursuant to 4 CSR 240-2.080(16), hereby requests a continuance of the hearing scheduled for March 14, 2007, until April 26, 2007, for the purpose of the presentation of the stipulation and agreement filed in this case, and for expedited treatment of this motion. In support of this motion, KCPL respectfully states as follows:

- 1. On February 13, 2007, KCPL, the Staff of the Missouri Public Service Commission ("Staff"), the Office of the Public Counsel ("Public Counsel"), and the Missouri Department of Natural Resources ("MDNR") filed a non-unanimous stipulation and agreement that purports to resolve all alleged deficiencies in KCPL's 2006 integrated resource plan ("IRP") filing.
- 2. On March 2, 2007, the Commission issued its Order Setting Time For A Stipulation Hearing which directed that the parties appear on March 14, 2007, beginning at 1:00 P.M. for the purpose of the presentation of the stipulation and agreement filed in this case.
- 3. On March 8, 2007, Deputy Chief Regulatory Law Judge Nancy Dippell issued a Notice Of Commissioners Steve Gaw And Robert M. Clayton III Of Hearing Topics which identified the following list of topics, among others, to be discussed at the March 14 hearing:

- 1. The status of environmental compliance of all generation facilities, especially Iatan I, including the status of any pending criminal and civil actions affecting its operation;
- 2. The effect of pending litigation in *State ex rel. Sierra Club v. PSC*, Case No. WD66893, on the stipulation, the development of Iatan II, the rehabilitation of Iatan I, and all rate cases decided or pending;
- 3. How the increasing prospect of the regulation of carbon emissions impacts the economics of Iatan II;
- 4. An update on cost projections of environmental upgrades to Iatan I and construction of Iatan II;
- 5. Given the increase in costs of Iatan II and the potential environmental regulatory changes, a comparison of electricity generation resources other than coal, including coal gasification, renewable generation, and nuclear energy;
- 6. An evaluation of the additional costs to construction and operation of Iatan II for potential new environmental requirements especially carbon emissions, information on models that are available to estimate the additional costs to comply with such requirements, and the probabilities used in estimating the likelihood that such requirements will be adopted; and
- 7. The effect of potential rulemaking dockets and legislation on energy efficiency, renewable portfolio standards, and demand response.
- 4. In order to more fully prepare to address the substantive topics referenced above, KCPL respectfully requests that the Commission grant it a continuance until April 26, 2007 for the Stipulation Hearing.
- 5. In addition, KCPL is aware that the Commission's calendar over the next five weeks is consumed by evidentiary hearings in two major electric cases involving AmerenUE and Aquila, Inc.
- 6. The undersigned counsel is authorized to state that counsel for the Staff, Public Counsel, Praxair, and MDNR have no objection to the requested continuance in this matter.

Pursuant to 4 CSR 240-2.080(16), KCPL states that there will be no negative 7. effect on KCPL's customers or the general public if the Commission acts on this motion on an expedited basis, and that this pleading was filed as soon as possible.

WHEREFORE, Kansas City Power & Light Company requests a continuance of the Stipulation Hearing scheduled for March 14, 2007, until April 26, 2007, and for expedited treatment of this motion.

Respectfully submitted,

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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 9th day of March 2007, upon all parties of record in this case as follows:

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