

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

In the Matter of the Joint Application of Great Plains)	
Energy Incorporated, Kansas City Power & Light)	
Company and Aquila, Inc. for Approval of the)	Case No. EM-2007-0374
Merger of Aquila, Inc. with a Subsidiary of Great)	
Plains Energy Incorporated and for other related)	
relief)	

**MOTION FOR LEAVE TO FILE ADDITIONAL
SUPPLEMENTAL DIRECT TESTIMONY AND
NOTICE OF WITHDRAWAL OF CERTAIN REGULATORY PLAN REQUESTS**

Joint Applicants Great Plains Energy Incorporated (“Great Plains Energy”), Kansas City Power & Light Company (“KCPL”), and Aquila, Inc. (“Aquila”) (collectively, “Joint Applicants”) respectfully request that the Commission permit them to file additional supplemental direct testimony by three witnesses for the purpose of withdrawing certain requests in the proposed Regulatory Plan that was previously submitted to the Commission with regard to the proposed merger of Aquila into a subsidiary of Great Plains Energy.

The Joint Applicants also provide notice to the Commission of the requests that are being withdrawn in regard to the Regulatory Plan. In this regard, the Joint Applicants state:

1. As set forth in the Joint Applicants’ Detailed Status Report filed on February 20, 2008, the Joint Applicants are filing contemporaneously herewith additional supplemental direct testimony to withdraw certain of the prior requests that were part of the proposed Regulatory Plan and that were contained in either the Joint Application or in the previously filed supplemental direct testimony of August 8, 2007. The witnesses filing this testimony are: Terry Bassham, Executive Vice President and Chief Financial Officer of Great Plains Energy and Chief Financial Officer of KCPL; Michael W. Cline, Vice President, Treasury and Investor Relations of Great Plains Energy and Treasurer of KCPL; and Chris B. Giles, Vice President, Regulatory Affairs of KCPL.

2. Because 4 CSR 240-2.130(8) does not allow a party to supplement prefiled testimony unless authorized by the Commission, the Joint Applicants hereby request leave of the Commission for good cause pursuant to 4 CSR 240-2.015 to submit this additional supplemental direct testimony. Good cause exists because the testimony that the Joint Applicants propose to file will simplify the proceedings by removing certain issues that are currently in controversy. These issues will no longer need to be litigated by the parties and will not need to be decided by the Commission.

3. The major points that will be addressed in this additional testimony are:

a. The Joint Applicants will not seek to recover in any future general ratemaking proceeding in Missouri any interest expense in excess of equivalent investment-grade debt that is currently held by Aquila.

b. The Joint Applicants will not request a specific merger savings sharing mechanism, such as contained in Paragraph 44 of the Joint Application. Rather, the Joint Applicants will rely upon the traditional regulatory ratemaking process set forth in Chapters 386 and 393 of the Missouri Revised Statutes, so that any merger synergy savings will be passed through to Aquila and KCPL customers in future rate cases.

c. The Joint Applicants will not request in this proceeding that the Commission authorize and permit Aquila to utilize the mechanism of Additional Amortizations to Maintain Financial Ratios to preserve and maintain investment-grade financial metrics in Aquila's next general rate case.

4. None of the testimony will propose changes to the structure of the merger or to the post-closing operational structure of the Joint Applicants.

WHEREFORE, the Joint Applicants request leave of the Commission to file additional supplemental direct testimony in this case.

Respectfully submitted,

/s/ Karl Zobrist

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing has hand-delivered, emailed or mailed postage prepaid, first class, this 25th day of February, 2008, to all counsel of record.

/s/ Curtis Blanc _____