

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

In the Matter of An Application for a)	
Variance from 4 CSR 240-13.035(1))	Case No. EO-2014-____
Regarding Denial of Service Notice)	

**APPLICATION FOR A VARIANCE CONCERNING THE DENIAL OF SERVICE
NOTICE REQUIREMENT OF KANSAS CITY POWER & LIGHT COMPANY AND
KCP&L GREATER MISSOURI OPERATIONS COMPANY**

Pursuant to 4 C.S.R. 240-2.060, -2.015 and -13.035(5), Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively the “Company”) hereby respectfully submit to the Missouri Public Service Commission (“Commission”) an application (“Application”) for variance concerning the notice requirement of the Commission’s denial of service rule as set forth in 4 CSR 240-13.035(1). Good cause exists for this variance. In support of its Application, the Company offers as follows:

1. KCP&L is a Missouri corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. KCP&L is primarily engaged in the business of generating, transmitting, distributing, and selling electric energy in portions of eastern Kansas and western Missouri. KCP&L is an electrical corporation and public utility as defined in Section 386.020, Mo. Rev. Stat. (2000), as amended.¹ KCP&L provided its Certificate of Good Standing in Case No. EF-2002-315 which is incorporated herein by reference.

2. GMO is a Delaware corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. GMO is primarily engaged in the business of generating, transmitting, distributing, and selling electric energy in portions of northwestern

Missouri. GMO is an electrical corporation and public utility as defined in Mo. Rev. Stat. § 386.020 (2000). GMO provided its certificate authorizing it to do business in Missouri as a foreign corporation in Case No. EN-2009-0164. That certificate is incorporated herein by reference pursuant to 4 CSR 240-2.060(G).

3. KCP&L 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. KCP&L has one pending action² against it from any state or federal agency or court that involve customer service or rates, which has occurred within three years of the date of this Application. In addition, no annual report or assessment fees are overdue.

4. GMO 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. GMO has one pending action³ against it from any state or federal agency or court that involve customer service or rates, which has occurred within three years of the date of this Application. In addition, no annual report or assessment fees are overdue.

5. In addition to undersigned counsel, pleadings, notices, orders and other correspondence and communications concerning this Application should be addressed to:

¹ All statutory references are to the Missouri Revised Statutes (2000), as amended to date.

² *David L. Biersmith, Sr., v. Kansas City Power & Light Company* Mo. P.S.C. File No. EC-2014-0249.

³ *Ag Processing, Inc. a Cooperative v. KCP&L Greater Missouri Operations Company*, Mo. P.S.C. File No. HC-2012-0259.

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6. On March 30, 2014, amendments to the Commission's denial of service rule will go into effect. The new rule imposes a written notice requirement upon the utility when it denies service to an applicant. The Company has been working to implement an automated process to provide written notice for such denials. However, the Company will not meet the March 30, 2014 effective date of the rule.

7. Good cause exists for the variance requested herein. Due to the press of other business, the Company has not completed the computer programming necessary to begin written denial notices by March 30, 2014.

8. The Company hereby requests a 60-day variance until May 29, 2014 to begin sending written denial notices to customers. Customers do not receive written notice today and therefore will not be harmed in the delay of written notice.

9. The Company does not anticipate that this matter will be a contested case. Accordingly, the Company is not required to file a 60-day Notice of Filing pursuant to 4 CSR 240-4.020(2). However, to the extent that a 60-day Notice of Filing could otherwise be required under 4 CSR 240-4.020(2), the Company respectfully requests that such notice requirement be waived for good cause since a 60-day Notice of Filing would mean that the filing of a variance from the written denial notice requirement could not be made until after the rule is in effect.

10. For the foregoing reasons, the Company respectfully requests that the Commission grant a variance from 4 CSR 240-13.035(1) so that the deadline for implementing written denial notices is May 29, 2014.

Respectfully submitted,

/s/ Roger W. Steiner

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**Counsel for Kansas City Power & Light
Company and KCP&L Greater Missouri
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AFFIDAVIT

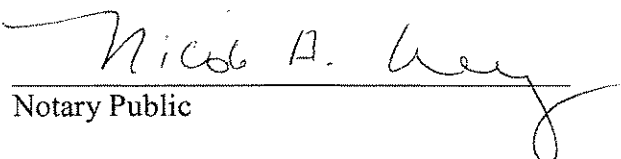
State of Missouri)
) ss
County of Jackson)

I, Tim Rush, having been duly sworn upon my oath, state that I am the Director, Regulatory Affairs of Kansas City Power & Light Company ("KCP&L"), that I am duly authorized to make this affidavit on behalf of KCP&L and KCP&L Greater Missouri Operations Company, and that the matters and things stated in the foregoing application are true and correct to the best of my information, knowledge and belief.

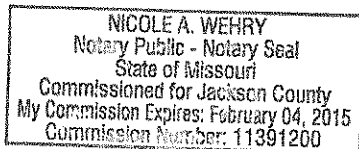


Tim Rush

Subscribed and sworn before me this 14th day of March, 2014.



Notary Public



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application was served on all counsel of record either by electronic mail or by first class mail, postage prepaid, on this 14th day of March, 2014.

/s/ Roger W. Steiner

Roger W. Steiner