

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

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|---|---|-----------------------|
| In The Matter of the Application of Aquila, |) | |
| Inc., d/b/a Aquila Networks – MPS and |) | |
| Aquila Networks – L&P for Authority to |) | |
| Transfer Operational Control of Certain |) | Case No. EO-2008-0046 |
| Transmission Assets to the Midwest |) | |
| Independent Transmission System |) | |
| Operator, Inc. |) | |

STATEMENT OF POSITION OF KANSAS CITY POWER & LIGHT COMPANY

Pursuant to the Second Order Modifying Procedural Schedule issued by the Missouri Public Service Commission (“Commission”) in the above-captioned proceeding, Kansas City Power & Light Company (“KCPL”) hereby provides its Statement of Position with respect to the issues identified in the List of Issues, and Order of Opening Statements, Witnesses and Cross-Examination filed by the Staff on March 7, 2008.

1. Is “not detrimental to the public interest” the appropriate standard for the Commission to use in making its determinations in this case?

Yes, the “not detrimental to the public interest” standard is the appropriate standard for the Commission to use in making its determinations in this case.

2. Should the Commission determine that Aquila’s application to join MISO is not detrimental to the public interest? What considerations should the Commission take into account in making its determination?

KCPL takes no position on this issue at this time.

3. If the Commission approves Aquila’s application to join MISO, should the Commission make its approval subject to certain conditions? If so, what are the conditions?

KCPL takes no position on this issue at this time.

4. In making its determination whether to grant Aquila's application to join MISO, should the Commission compare Aquila's membership in MISO to other alternatives? If so, what are the alternatives and what do the comparisons of the alternatives show?

KCPL takes no position on this issue at this time.

5. To what extent should the Commission take into account the following in its determination of whether or not to approve Aquila's application to join MISO?

- a. The CRA International, Inc. cost-benefit study sponsored by Aquila;
- b. Cost-benefit analyses sponsored by parties other than Aquila
- c. Costs and/or benefits not included in the CRA International cost-benefit study sponsored by Aquila or cost-benefit analyses sponsored by parties other than Aquila;
- d. Aquila's current relationships with MISO and SPP;
- e. Differences in the development of electricity markets between MISO and SPP;
- f. The proposed acquisition of Aquila by Great Plains Energy that is the subject of Case No. EM-2007-0374;
- g. Union Electric Company's continuing membership in MISO;
- h. Aquila's obligation to MISO made in FERC Docket No. ER02-871 to file and support Aquila's application to join MISO;

KCPL takes no position on this issue at this time.

6. If the Commission authorizes Aquila to join MISO, should the Commission determine now whether all future FERC-approved administrative fees Aquila is assessed by MISO and all future costs Aquila incurs from MISO in making prudent purchases of capacity

and/or energy to serve its bundled retail load should be considered to be prudently incurred expenses for purposes of including them in Aquila's cost of service in Aquila's next general electric rate case before this Commission?

Yes, the Commission should make such a determination.

Respectfully submitted,

/s/ **Curtis D. Blanc**

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Counsel for Kansas City Power & Light Company

Dated: March 18, 2008

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, postage prepaid, this 18th day of March 2008 to all counsel of record.

/s/ ***Curtis D. Blanc***

Curtis D. Blanc