

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

In the Matter of the Construction Audit and )  
Prudence Review of Environmental Upgrades )  
To Iatan 1 and Iatan Common Plant, Including All )  
Additions Necessary for These Facilities to )  
Operate. )

**Case No. EO-2010-0259**

**KANSAS CITY POWER & LIGHT COMPANY'S AND GMO'S MOTION TO  
RESCHEDULE THE ON-THE-RECORD PROCEEDING**

COMES NOW Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”)(collectively the “Companies”), by and through counsel, and files their motion to reschedule the on-the-record proceeding from April 6, 2010 to the following week of April 12 for a full two-day hearing. In support of this motion, the Companies respectfully state as follows:

1. The Commission’s March 15 Order, among other things, scheduled an on-the-record proceeding for Tuesday, April 6, 2010 beginning at 2:00 p.m. The Commission directed that the “parties shall be prepared to provide a complete explanation of every aspect of the on-going construction and prudence audit that was ordered to be completed on December 31, 2009.” (March 15 Order, p. 3). In addition, the March 15 Order directed Staff to “make available all Staff members who have participated in the audit,” and required that “If any party intends to tender expert witnesses at the on-the-record proceeding scheduled for April 6, 2010, they shall file a pleading disclosing the identity and biographical background of those experts no later than March 30, 2010.” (Id.)

2. As the Companies explained in Kansas City Power & Light Company’s and GMO’s (1) Response To Order Establishing Investigatory Docket; and (2) Response To Staff Motion To Open Construction Audit And Prudence Review Investigation Case filed on March

22, 2010, the Companies do not believe the Commission has scheduled adequate time for a full examination of all aspects of the audits and requests the Commission schedule two full days for the on the record hearing in this matter in order to accommodate witnesses and cross examination. The Companies also requested a procedural order from the Commission providing guidance on the issues to be addressed, the order of presentations and witnesses and the order of cross examination.

3. The Companies request that the Commission reschedule the on-the-record proceeding for two full days during the week of April 12, 2010. A key witness for the Companies, Dr. Kris R. Nielson of Pegasus Global Holdings, Inc., is not available on April 6 or any other day during that week. Dr. Nielson will be presented by the Companies to discuss the industry standards for cost tracking mechanisms, the legal standard of prudence used in prudence reviews, and the nature and scope of traditional prudence audits of power plant construction projects. His availability for this proceeding is considered critical by the Companies, and therefore the Companies request that the Commission delay the proceeding by a few days to accommodate his participation.

**WHEREFORE**, the Companies respectfully request that the Commission reschedule the on-the-record proceeding for two full days during the week of April 12, 2010.

Respectfully submitted,

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**ATTORNEYS FOR KCP&L AND GMO**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served either by electronic mail or by first class mail, postage prepaid, on this 22<sup>nd</sup> day of March 2010 to counsel for all parties of record.

/s/ James M. Fischer  
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