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

)

)

)

In the Matter of the Application of Kansas City Power & Light Company for Approval to Amend the Nuclear Decommissioning Trust Agreement

Case Nos. EO-2004-0590

## **NUCLEAR DECOMMISSIONING TRUST FUND COMPLIANCE FILING**

Pursuant to the Order Directing Filing issued by the Missouri Public Service Commission ("Commission") on August 10, 2006 in the above-captioned proceeding, Kansas City Power & Light Company ("KCPL") respectfully submits its quarterly reports of administrative costs and other incidental expenses ("Administrative Cost Reports") for the Wolf Creek Nuclear Decommissioning Trust Fund for the first and second quarters of 2006 and explains why it did not submit the reports in a more timely manner.<sup>1</sup>

KCPL submits concurrently herewith its quarterly Administrative Cost Reports for the periods ending March 31, 2006 and June 30, 2006, *i.e.*, the first and second quarters of 2006. KCPL typically submits its Administrative Cost Reports within 60 days of the close of the quarter. Although KCPL's submission of its Administrative Cost Report for the second quarter of 2006 is timely, KCPL's submission of its Administrative Cost Report for the first quarter of 2006 is not consistent with KCPL's past practices.

KCPL regrets any inconvenience caused by its untimely submission of its Wolf Creek Decommissioning Trust Fund report for the first quarter of 2006. As explained below, KCPL believes that the untimeliness of this filing is the result of unique circumstances that are unlikely

<sup>&</sup>lt;sup>1</sup> As a matter of administrative convenience KCPL typically submits its Administrative Cost Reports concurrently with its reporting requirements under 4 CSR 240-3.185. KCPL has requested, but net yet received from the trustee, the information it provides in compliance with 4 CSR 240-3.185. KCPL anticipates that it will receive that data within the next couple of days. KCPL will provide that information to the Commission as soon as KCPL receives it.

to reoccur. Moreover, KCPL has taken steps to help ensure that such reports are filed in a timely manner going forward.

KCPL did not submit its Wolf Creek Decommissioning Trust Fund reports for the first quarter of 2006 in a more timely manner because of changes in personnel at the Company. Specifically, the Financial Analyst charged with obtaining the necessary information from the trustee of the fund and initiating the filing process left KCPL suddenly and unexpectedly at the time KCPL would have typically been preparing the reports for the first quarter of 2006. The difficulties associated with the analyst's departure were exacerbated by the transfer to another area of the Company of the person in the financial reporting group who would most logically have assumed the analyst's responsibilities. KCPL made best efforts to ensure that it continued to satisfy all finance-related reporting requirements throughout this transition, but regrettably, the Wolf Creek Decommissioning Trust Fund reports for the first quarter of 2006 were overlooked.

KCPL has hired a new Financial Analyst who is responsible for the Wolf Creek Decommissioning Trust Fund reports. As an additional prophylactic step, the Law Department will be more directly involved with the preparation and submission of such reports. KCPL believes that the situation that led to its untimely submission of the Wolf Creek Decommissioning Trust Fund reports for the first quarter of 2006 is unique, and that it has taken steps to ensure that future reports will be submitted in a more timely manner. Respectfully submitted.

CO. ~?

Curtis D. Blanc – Mo. Bar No. 58052 1201 Walnut, 20<sup>th</sup> Floor Kansas City, MO 64106-2124 Telephone: (816) 556-2483 Facsimile: (816) 556-2787 E-Mail: Curtis.Blanc@kcpl.com

Counsel for Kansas City Power & Light Company

Dated: August 21, 2006

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing comments were served via first class mail,

postage pre-paid, on this 21<sup>st</sup> day of August, 2006 upon each of the following parties of record:

General Counsel Missouri Public Service Commission 200 Madison Street P.O. Box 360 Jefferson City, Missouri 65102

Office of Public Counsel 200 Madison Street P.O. Box 2230 Jefferson City, Missouri 65102

D. R.E

Curtis D. Blanc