BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of KCP&L)		
Greater Missouri Operations Company for)	Case No.	
Authority to Sell its Liberty Service)		
Center)		

APPLICATION

COMES NOW KCP&L Greater Missouri Operations Company ("KCP&L-GMO" or "Applicant"), pursuant to 4 CSR 240-2.060 and 4 CSR 240-3.110 hereby respectfully submits to the Missouri Public Service Commission ("Commission") its Application for Authority to Sell its Liberty Service Center. In support of its request, Applicant states as follows:

I. APPLICANT

1. Applicant is a Delaware corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. Applicant is primarily engaged in providing electric and steam utility service in Missouri to the public in its certificated areas. Applicant is an "electrical corporation" and a "public utility" subject to the jurisdiction, supervision and control of the Commission under Chapters 386 and 393. A Certificate of Authority for a foreign corporation to do business in the State of Missouri, evidencing the Company's authority under the law to conduct business in the State of Missouri, was filed with the Commission in Case No. EU-2002-1053 and is incorporated herein by reference in accordance with 4 CSR 240-2.060(1)(G). KCP&L-GMO's fictitious name registration was filed in Case No. EN-2009-0015 and is incorporated herein by reference.

¹ Applicant is the surviving corporation that resulted from the recent merger of Aquila, Inc., a Delaware corporation, and Gregory Acquisition Corp., a Delaware corporation, which was a direct, wholly-owned subsidiary of Great Plains Energy Incorporated, a Missouri corporation. This merger was approved by the Commission in its Report and Order issued on July 1, 2008 in Case No. EM-2007-0374.

2. Applicant has one pending action (Rahm v. KCP&L Greater Missouri Operations Company, File No. EC-2010-0173) against it from any state or federal agency or court that involves customer service or rates, which has occurred within three years of the date of this

Application. No annual report or assessment fees are overdue.

3. Pleadings, notices, orders and other correspondence and communications

concerning this Application should be addressed to the undersigned counsel and:

Tony Carreno Director, Regulatory Affairs Kansas City Power & Light Company 1200 Main Street Kansas City, Missouri 64105 Phone: (816) 654-1763

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II. SUMMARY

This Application seeks a determination by the Commission regarding the pending

sale of property at Applicant's Liberty Service Center located in Liberty, Missouri to Tuf-Flight Industries, Inc. The sale of the Liberty Service Center is occasioned by the integration of KCP&L-GMO and Kansas City Power & Light Company ("KCP&L") operations as a result of the transaction that was approved by the Commission in Case No. EM-2007-0374. As the Joint Applicants in Case No. EM-2007-0374 explained to the Commission, the Liberty Service Center has been closed as part of the consolidation of service centers owned by KCP&L and KCP&L-

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GMO. (Ex. No. 17, Herdegen Supp. Direct at 11, Ex. No. 31, Zabors Supp. Direct at p. 11, Ex.

No. 21, Marshall Supp. Direct at 12-13, Case No. EM-2007-0374).

5. Applicant is requesting the Commission to approve the sale of the Liberty Service

Center.

4.

- 6. Pursuant to 4 CSR 240-3.110, a brief description of the property involved is contained in Attachment No. 1 which is attached hereto and incorporated herein by reference. A signed copy of the Commercial Real Estate Sales Contract ("the Agreement") is contained in Attachment No. 2 (HC) which is attached hereto and incorporated by reference. The Liberty Service Center has already been vacated and operations are currently being handled out of the existing Northland Service Center.
- 7. The proposed sale of the Liberty Service Center is not detrimental to the public interest since the sale will result in more efficient operations for KCP&L-GMO and KCP&L. Synergy savings from this proposed sale will be passed along to customers in future rate cases involving KCP&L-GMO and KCP&L, as explained in the Joint Applicants' testimony filed in Case No. EM-2007-0374.
- 8. The Greater Kansas City Metropolitan Area is managed as a single district, including both the service areas of KCP&L-GMO and KCP&L. To more efficiently serve the metropolitan area, KCP&L-GMO and KCP&L planned two service center consolidations. The first was a merger of the existing Liberty and former Platte City Service Centers into KCP&L's Northland facility. The Commission approved the sale of the Platte City Service Center in Case No. EO-2009-0148. The second consolidation will combine existing service center operations in Lee's Summit, Blue Springs, and Dodson into a new facility to be built in or near Lee's Summit along the I-470 corridor. In addition to improved efficiencies, these consolidations will also help foster a unified culture. The consolidation efforts will also deliver labor efficiencies from economies of scale. These changes will continue to improve customer satisfaction, reliability, safety and cost related to the distribution of electricity in the Greater Kansas City Metropolitan Area.

- 9. Because of the geographical proximity of the existing service centers, the two consolidations discussed above will allow KCP&L-GMO and KCP&L to operate more efficiently, leveraging manpower and equipment. The combination of these service centers will allow the companies to more efficiently man crews and to be able to respond to customer requests in a timely manner. The outage response will be enhanced in the north eastern metropolitan area by inclusion of the primary population centers into KCP&L's 24/7 coverage. Operations crews assigned to the Northland Service Center are staffed in accordance with the policy of continual coverage.
- 10. The proposed sale of the Liberty Service Center should have no impact upon the tax revenues of the political subdivision in which the structures, facilities or equipment is located.

WHEREFORE, for the foregoing reasons, Applicant respectfully requests that the Commission issue an order approving the sale of the Liberty Service Center by March 15, 2010, as proposed herein, and for such other relief as may be granted herein.

Respectfully submitted,

/s/ Roger W. Steiner

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Attorneys for KCP&L Greater Missouri Operations Company

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 14th day of January, 2010, to the Office of the General Counsel and the Office of the Public Counsel.

/s/ Roger W. Steiner
Attorney for KCP&L Greater Missouri Operations
Company

AFFIDAVIT

State of Missouri)
County of Jackson) ss)
Director, Regulatory authorized to make t	. Carreno, having been duly sworn upon my oath, state that I am the Affairs of Kansas City Power & Light Company ("KCPL"), that I am duly his affidavit on behalf of the Applicant, and that the matters and things ag pleading are true and correct to the best of my information, knowledge
	Anthony P. Carreno Anthony P. Carreno
Subscribed an	d sworn before me this <u>/</u> 4 day of January, 2010
	Micol A. Wey Notary Public
Nicole A. We Jackson Coul My Commissi	ARY SEAL " ehry, Notary Public onty, State of Missouri on Expires 2/4/2011 on Number 07391200

Attachment No. 1

Description of the Property to Be Sold

Liberty Service Center

2250 North SR A Liberty, Missouri

Located off of Highway 291 and Interstate I-35

8.4 acres5 acres paved10,000 SF office and warehouse

Attachment No. 2

Contract of Sale

FILED AS HC