

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

<b>In the Matter of the Joint Application of</b>	)	
<b>Great Plains Energy Incorporated, Kansas City Power</b>	)	
<b>&amp; Light Company, and Aquila, Inc. for Approval of</b>	)	<b>Case No. EM-2007-0374</b>
<b>the Merger of Aquila, Inc. with a Subsidiary of Great</b>	)	
<b>Plains Energy Incorporated and for Other Related</b>	)	
<b>Relief.</b>	)	

**GREAT PLAINS ENERGY INCORPORATED AND  
KANSAS CITY POWER & LIGHT COMPANY'S  
RESPONSE TO MOTION FOR RECONSIDERATION**

COMES NOW Great Plains Energy Incorporated (Great Plains Energy) and Kansas City Power & Light Co. (KCPL) and for its response to the Office of the Public Counsel's (OPC) Motion for Reconsideration filed on December 14, 2007, states as follows:

1. OPC asked the Commission to reconsider its removal of a deadline for responses to the December 5, 2007 Motion for Partial Summary Determination filed by Ag Processing, Inc., Sedalia Industrial Energy Users Association, and Praxair, Inc. (the Industrials). That motion argued that Missouri law prevents the Commission from affording Aquila, Inc. the opportunity to use a regulatory amortization mechanism.

2. OPC's Motion for Reconsideration does not take a position on the Industrials' motion but requests that the Commission order responses to the motion so that the Commission can rule on the motion. OPC believes a ruling on the Industrials' motion would assist in the settlement negotiations in this docket. See Motion for Reconsideration at 2.

3. The Industrials' also support the OPC Motion and request that the Commission issue a substantive decision on the amortizations mechanism. See Industrials' Response to Motion for Reconsideration (filed Dec. 26, 2007).

4. Great Plains Energy and KCPL oppose the Industrials' motion, but believe that the Commission does not need to make a decision on the motion at this time. Such a decision is best made after the record in the case is fully developed and the post-hearing briefing is final. Even though the motion states that it is a purely legal issue, the facts to which any legal analysis and decision must be applied are unclear at this point. The applicants are in the process of reviewing the structure of the merger's regulatory plan, which currently includes the proposed use of additional amortizations by Aquila in future rate cases. Applicants expect to present a revised regulatory merger plan to the parties in early January 2008, which will be the basis for a possible settlement of the case. Therefore, it is not known at this time whether regulatory amortizations will be a part of the merger plan and, if they will be, what the specific nature of the amortizations will be, when they will be available, and what the other factual details will surround the mechanism.

5. Therefore, Great Plains Energy and KCPL disagree that an early Commission decision on the Industrials' motion would assist efforts to settle the case or otherwise clarify the relevant legal issues. Any decision by the Commission relating to additional amortizations would, in any event, still be subject to review by the courts. Thus, a decision by the Commission on the Industrials' Motion for Partial Summary Determination at this stage of the proceedings will provide limited guidance and assistance to the parties.

WHEREFORE, Great Plains Energy Incorporated and Kansas City Power & Light Co. request that the Commission deny OPC's Motion for Reconsideration.

Respectfully submitted,

/s/ Karl Zobrist

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**Attorneys for Great Plains Energy Inc. and Kansas City Power & Light Co.**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document have been mailed, hand delivered, transmitted by facsimile or emailed this 26<sup>th</sup> day of December, 2007, to all counsel of record.

/s/ Karl Zobrist

Karl Zobrist