

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

In the Matter of the 2009 Resource Plan of)
KCP&L Greater Missouri Operations Company)
Pursuant to 4 CSR 240-22.)

Case No. EE-2009-0237

Staff's Reply Brief

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Reply Brief*, states that it is Staff's position that KCP&L Greater Missouri Operations Company ("GMO") has complied with the Commission's integrated resource planning rules at Chapter 22, 4 CSR 240, albeit tardily.

Staff also has concerns which were addressed by Staff witness Lena Mantle in her hearing testimony, particularly with respect to GMO's lack of generation resources sufficient to serve its native load over the next twenty years.

Staff notes that Dogwood Energy has pointed out in its brief, correctly, that GMO must make a new Chapter 22 Compliance filing by April 2012. Furthermore, that filing will be under the newly adopted IRP rules. Staff would prefer GMO put its efforts toward that filing instead of making further changes to its 2009 IRP or its 2011 substitute IRP at this point. Therefore, Staff suggests that the Commission direct GMO to address Staff's concerns in its April 2012 Chapter 22 Electric Resource Planning compliance filing.

WHEREFORE, Staff prays that the Commission will accept its *Reply Brief*, find that GMO's second revised IRP satisfies GMO's obligations under the applicable Chapter 22 rules, take note of Staff's stated concerns with that IRP and direct GMO to

address those concerns in its next Chapter 22 compliance filing; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

s/ Kevin A. Thompson
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Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this **22nd day of September, 2011**, on the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

s/ Kevin A. Thompson