

KANSAS CITY POWER & LIGHT COMPANY

1330 BALTIMORE AVENUE

KANSAS CITY, MISSOURI 64105

LAW DEPARTMENT
(816) 256-2783

September 10, 1986

2/2/87
Mr. Harvey G. Hubbs
Missouri Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65102

RE: Request For Approval of Filing
Case No. HO-86-139

Dear Mr. Hubbs:

Please find enclosed for filing the original and fourteen copies of Kansas City Power & Light Company's Request For Approval of Filing. Please cause this document to be filed.

All parties of record have been served with a copy of the Request For Approval of Filing.

Thank you very much for your consideration in this matter.

Very truly yours,

Mark G. English
Mark G. English

MGE:cb

Enc.

cc w/enc.: All Parties of Record

FILED
SEP 11 1986
PUBLIC SERVICE COMMISSION

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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Investigation)
of Steam Service Rendered by)
Kansas City Power & Light Company) Case No. HO-86-139

REQUEST FOR APPROVAL OF FILING

Comes now KCPL and requests the Commission's approval of the form of filing KCPL proposes to make in compliance with the Commission's order that KCPL file minimum filing requirements in this matter. In support thereof, KCPL states:

1. That by Paragraph ORDERED: 3. of its Order dated August 25, 1986, the Commission required KCPL to file its prepared direct testimony and schedules and "minimum filing requirements" on or before October 3, 1986. The Order did not specify the content of these "minimum filing requirements."

2. Chapter 80 of the Commission's regulations (4 CSR 240-80) pertains to steam service rate schedules and the uniform system of accounts for heating companies, but it does not contain any provision for minimum filing requirements in steam rate cases. Chapter 20 of the Commission's regulations (4 CSR 240-20) provides certain minimum filing requirements for electric utility tariff changes; however, there is no regulatory provision making these requirements applicable to steam rate cases. KCPL is thus of the opinion that there is no provision in the Commission's regulations which defines the content of "minimum filing requirements" for steam rate cases.

3. KCPL was also ordered to file "minimum filing requirements" in its last steam rate case, Case No. HR-83-245. KCPL consulted with the Commission Staff at that time concerning the information Staff wished to see in KCPL's filing, and pursuant to such consultation filed testimony and exhibits in support of its proposed steam rate increase. A copy of KCPL's May 31, 1983 filing letter in Case No. HR-83-245 is attached hereto as Appendix A.

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SEP 11 1986

MISSOURI PUBLIC SERVICE COMMISSION

4. KCPL and Staff have held discussions regarding the kinds of information the Staff wished to see in KCPL's initial filing on October 3, in the absence of regulations or Commission directive concerning the contents of the ordered "minimum filing requirements". It is KCPL's understanding that Staff wishes KCPL to provide the same kinds of information that KCPL included in its initial testimony and exhibit filing in Case No. HR-83-245, and KCPL has no objection thereto.

5. KCPL thus proposes to file on or before October 3 direct testimony and exhibits which include, among other things, the kinds of information KCPL furnished in its initial filing in Case No. HR-83-245. For the information of the Commission and parties, Exhibit B contains a listing of the accounting schedules KCPL proposes to include in its October 3 filing. KCPL believes that this filing will be in compliance with the procedural filing requirements in the Commission's August 25, 1986 Order, and requests that the Commission approve this proposed form of filing as being in compliance with said Order.

6. KCPL has previously orally informed Office of Public Counsel of this proposed form of filing. KCPL is not aware of any applications for intervention being filed in this case; however, it wishes to request on the record Commission approval of this proposed filing.

WHEREFORE, KCPL requests that the Commission approve KCPL's proposed form of filing of direct testimony and exhibits as complying with the procedural requirement of filing its "prepared direct testimony and schedules and minimum filing requirements."

Respectfully submitted,



Mark G. Eggleston
1230 Baltimore Avenue
Kansas City, Missouri 64105

ATTORNEY FOR
KANSAS CITY POWER & LIGHT COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document was mailed, postage prepaid, this 12 day of September, 1986, to:

Mr. Steve Dottheim
Missouri Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65102

Mr. Rick French
Office of the Public Counsel
P. O. Box 7800
Jefferson City, Missouri 65102



Mark G. English