

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

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

**RESPONSE OF GREAT PLAINS ENERGY INC. AND
KANSAS CITY POWER & LIGHT CO. TO APPLICATION
FOR RECONSIDERATION BY INDICATED INDUSTRIALS**

Great Plains Energy Incorporated (“Great Plains Energy”) and Kansas City Power & Light Co. (“KCPL”) state the following in opposition to the Application for Reconsideration by the Indicated Industrials (“Industrials”):

1. The Industrials complain that the Commission’s March 11 Second Order Adopting Procedural Schedule improperly ignored their request that the Additional Supplemental Direct Testimony of three witnesses filed by the Joint Applicants on February 25 should be labeled Supplemental Surrebuttal. The Industrials also assert that the Commission improperly ruled on a motion in limine by refusing to adopt the Industrials’ naming request. The Commission’s pragmatic view of this request had nothing to do with the Industrials’ Second Motion in Limine, which was not filed until March 13. In light of the fact that the Supplemental Direct Testimony outlines the scope of this case as it now stands, the Commission was correct in determining that the title of the testimony was not as important as the parties’ ability to cross-examine these witnesses on any aspect of their testimony at the hearing.

2. Moreover, there was no pre-judgment by the Commission in the Second Order Adopting Procedural Schedule on the admissibility of the testimony. Nothing in that order precludes any party from objecting to testimony that is offered by any other party.

3. Additionally, for the reasons stated in the Opposition of Great Plains Energy and KCPL to the Industrials' Second Motion in Limine, filed contemporaneously with this pleading, the Commission should remain faithful to its ruling of December 3, 2007 which denied the Industrials' First Motion in Limine. See Transcript at 99-100. The Industrials have presented no new arguments and have instead rehashed their old argument that portions of the Supplemental Direct Testimony should be struck because they relate to synergies stemming from the integration of KCPL and Aquila, rather than a hypothetical merger of the two utilities.

4. For these reasons, the Commission should deny the Application for Reconsideration.

Respectfully submitted,

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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 has been hand delivered, emailed or mailed, postage prepaid, this 18th day of March, 2008, to all counsel of record.

/s/ Karl Zobrist

Karl Zobrist