

**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)	Case No. EM-2007-0374
Of the Merger of Aquila, Inc. with a subsidiary of)	
Great Plains Energy Incorporated and for Other)	
Related Relief.)	

RESPONSE TO MOTION TO LIMIT SCOPE OF THE PROCEEDING

COMES NOW Ag Processing Inc, Sedalia Industrial Energy Users' Association and Praxair, Inc., (collectively referred to as "Industrial Intervenors") and for their Response to Motion to Limit Scope of the Proceeding filed by KCPL / GPE respectfully state as follows:

1. In its Motion, KCPL / GPE attempt to limit the scope of this proceeding. Specifically, KCPL / GPE seek to preclude Staff and other parties from offering evidence related to X (Additional Amortization / Credit Worthiness) and XI (Anonymous Public Allegations / Comments Related to Proposed Acquisition). Of particular interest to the Industrial Intervenors is the attempt to preclude the Commission from considering any evidence related to Credit Worthiness and KCPL / GPE's schedule and budget for the Comprehensive Energy Plan infrastructure commitments.

2. The relevance of the schedule and budget of these infrastructure commitments is reflected in the Joint Applicants' supplemental direct testimony. Specifically, the title of Michael Cline's supplemental direct testimony identifies the issue of Credit Quality. Among the information contained in that testimony are presentations to S&P and Moody's which form the basis for the opinion that **"_____

_____”** (Cline Supplemental Direct at page 4).

3. Among the assumptions contained in the presentation provided to S&P and Moody’s is the **“_____.”** (Schedule MWC-18 and MWC-19 at page 6). Specific to KCPL’s ability to meet its schedule for the completion of the infrastructure commitments, an assumption is made that the Iatan 2 power plant would be completed prior to **_____** (Schedule MWC-18 and MWC-19 at page 9). Similarly, assumptions are made related to KCPL’s ability to meet the budget for the Iatan 2 power plant. (Schedule MWC-18 and MWC-19 at page 25). These assumptions form the very foundation of the Joint Applicants’ assertion that GPE and its subsidiaries **_____

_____** Given that these assumptions form the foundation of the Joint Applicants’ opinion, the presentation of witnesses related to these assumptions is necessarily relevant to this proceeding.

4. Industrial Intervenors support Staff’s response related to Issue XI. As Staff details the Joint Applicants’ proposal to extend GPE / KCPL policies to Aquila will not necessarily result in the transfer of best practices; but, at least in regards to the operational areas addressed in this issue, may result in the transfer of worst practices and either a decrease in service or an increase in rates.

5. Given the relevance of these issues and the fact that this proceeding is easily on schedule and, thus far, poses no risk to going beyond that schedule, the Industrial Intervenors ask that the Motion to Limit the Proceedings be denied.

WHEREFORE, Industrial Intervenors respectfully request that the Commission reject KCPL / GPE's Motion to Limit Scope of the Proceeding.

Respectfully submitted,



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ATTORNEYS FOR AG PROCESSING
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INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.



Dated: April 24, 2008