

**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 FOR RECONSIDERATION

COMES NOW AG Processing, Inc. (“AGP”), Sedalia Industrial Energy Users’ Association (“SIEUA”) and Praxair, Inc. (collectively referred to as the “Industrial Intervenors”), and in response to the Motion for Reconsideration filed herein by the Office of the Public Counsel respectfully state:

1. On December 5, 2007, the Industrial Intervenors filed a Motion for Partial Summary Determination. The legal issue squarely raised in that Motion is whether an amortization mechanism, such as that requested by the Applicants in this case, would violate the anti-CWIP provisions of Section 393.135. By this Motion, the Industrial Intervenors have attempted to narrow the scope of the issues in this proceeding.

2. On December 10, 2007, without the request of any party, the Regulatory Law Judge, by delegation, postponed the deadline by which parties were required to respond to the Motion. On December 14, 2007, the Office of the Public Counsel (“OPC”) filed its Motion for Reconsideration of the RLJ’s decision.

3. The Industrial Intervenors support OPC’s Motion for Reconsideration. Despite the current break in the proceedings, the amortization mechanism remains part of the still-pending application. Applicants have taken no action to remove the amortization mechanism from their current application. Nor have they given the parties any indication

that they intend to remove this requested provision from any subsequent modification to that application. As such, the Motion for Partial Summary Determination remains timely and is ripe for consideration by the Commission.

4. Commission action on the pending motion will provide guidance to the parties on the Commission's perception of the regulatory amortization mechanism and whether such a mechanism can be implemented absent the consent of all the parties and will thereby increase administrative efficiency. Moreover, ruling on the Motion for Partial Summary Determination will better equip the parties to gauge the proper scope of any future modifications to the application as well as the parties' respective roles when discussing the scope of the amortization mechanism in any future settlement discussions.

WHEREFORE, the Industrial Intervenors respectfully request that the Commission: (1) reconsider its decision to postpone responses to the pending Motion for Partial Summary Determination; (2) set a deadline for responses to the Motion for Partial Summary Determination as requested by Public Counsel; and (3) issue its Order finding that the proposed regulatory amortization mechanism, to the extent not agreed to by the parties to this proceeding, violates Section 393.135 and is therefore unjust, unreasonable and prohibited by law.

Respectfully submitted,

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ATTORNEYS FOR AG PROCESSING,
INC., SEDALIA INDUSTRIAL ENERGY
USERS' ASSOCIATION AND PRAXAIR,
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.

A handwritten signature in black ink, appearing to read "Stu Conrad", enclosed within a rectangular box with a red vertical line on the right side.

Dated: December 26, 2007