

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

**In the Matter of the 2011 Resource Plan    )  
Of Kansas City Power & Light Company    )      File No. EE-2011-**

**APPLICATION FOR WAIVER CONCERNING  
KANSAS CITY POWER & LIGHT COMPANY'S FILING DATE  
FOR ITS NEXT INTEGRATED RESOURCE PLAN SUBMISSION**

Pursuant to 4 CSR 240-2.060 and 4 CSR 240-22.080(11) & (12), Kansas City Power & Light Company ("KCP&L") hereby respectfully submits to the Missouri Public Service Commission ("Commission") an application ("Application") for waiver concerning certain of the Commission's Electric Utility Resource Planning ("IRP") reporting requirements, as set forth in Chapter 22 of the Commission's regulations. In particular, KCP&L requests a waiver from the provisions of 4 CSR 240-22.080(3), and requests that it be permitted to delay its next Chapter 22 IRP submission from August 5, 2011 (the next scheduled filing date under the existing Chapter 22 Rule) until April 1, 2012 (the filing date for KCP&L contained in the pending Chapter 22 Rule being considered in File No. EX-2010-0254). Good cause exists for this waiver and extension of time to file the next KCP&L IRP submission. In support of its Application, KCP&L offers as follows:

1.      KCP&L is a Missouri corporation with its principal office and place of business at 1200 Walnut, Kansas City, Missouri 64106-2124. KCP&L is primarily engaged in the business of generating, transmitting, distributing, and selling electric energy in portions of eastern Kansas and western Missouri. KCP&L is an electrical corporation and public utility as defined in Mo. Rev. Stat. § 386.020 (2000). KCP&L provided its Certificate of Good Standing in Case No. EF-2002-315. It is incorporated herein by reference.

2.      KCP&L holds Certificates of Convenience and Necessity from the Commission to transact business as an electric public utility in certain areas of the State of Missouri and is principally engaged in the generation, transmission, distribution and sale of electric power and energy. KCP&L has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court that involve customer service or rates, which has

occurred within three years of the date of this Application, other than those listed in Exhibit A. No annual report or assessment fees are overdue.

3. Pleadings, notices, orders and other correspondence and communications concerning this Application should be addressed to the undersigned counsel and:

Tim M. Rush  
Director Regulatory Affairs  
Kansas City Power & Light Company  
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4. KCP&L must submit its next IRP submission by August 5, 2011 under the Commission's existing Chapter 22 Rule. See 4 CSR 240-22.080(3). However, the Commission is considering a substantial revision to the Chapter 22 rules in File No. EX-2010-0254. 4 CSR 240-22.080(3) of the revised rule under consideration by the Commission in File No. EX-2010-0254 would require KCP&L and KCP&L Greater Missouri Operations Company ("GMO") file their next IRP submission on April 1, 2012. 4 CSR 240-22.080(1) of the proposed rule states in part:

"... The electric utilities shall submit their triennial compliance filings on the following schedule:

(A) Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company, or their successors, on April 1, 2012 and every third year thereafter; . . ."

5. Good cause exists for the waiver requested herein. Substantial time, effort and costs (both for in-house personnel as well as outside consultants) are required for KCP&L to file a Chapter 22 IRP submission. KCP&L believes it would be inefficient and unreasonable to file an IRP submission on August 5, 2011, and then be required to file again on April 1, 2012, under the proposed Chapter 22 rule. In addition, a delay in the filing date for KCP&L's next IRP will allow KCP&L and GMO time to consider (with input from interested parties) the possibility of

filing a single, or streamlined IRP on April 1, 2012.

6. KCP&L has discussed this matter with the Commission Staff, and Staff has expressed support of this requested waiver and extension of time to file KCP&L's next IRP filing, as requested.

7. KCP&L is also not certain if this matter would be considered a "contested case" under the recently enacted 4 CSR 240-4.020 (Ex Parte and Extra Records Communications Rule). However, to the extent that a 60-day Notice of Filing would otherwise be required under 4 CSR 240-4.020(2), KCP&L respectfully requests that the notice requirement contained in 4 CSR 240-4.020(2) be waived since it was not known that it would be filing this Application sixty (60) days prior to the date that this Application is being filed.

**WHEREFORE**, for the foregoing reasons, KCP&L respectfully requests that the Commission waive the existing requirements of 4 CSR 240-2.080(3) for KCP&L's August 2011 submission, and grant KCP&L an extension of time to file its next IRP submission until April 1, 2012.

Respectfully submitted,

/s/ James M. Fischer

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**ATTORNEYS FOR KCP&L GREATER  
MISSOURI OPERATIONS COMPANY**

**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 5th day of August, 2010, to all counsel of record.

/s/ James M. Fischer  
James M. Fischer

**AFFIDAVIT**

**State of Missouri**                    )  
  ) ss  
**County of Jackson**                )

I, Tim M. Rush, having been duly sworn upon my oath, state that I am the Director, Regulatory Affairs of Kansas City Power & Light Company ("KCP&L"), that I am duly authorized to make this affidavit on behalf of KCP&L, and that the matters and things stated in the foregoing application and appendices thereto are true and correct to the best of my information, knowledge and belief.

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Tim M. Rush

Subscribed and sworn before me this \_\_\_\_ day of August 2010.

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Notary Public