

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

In the Matter of Filing Requirement Rules) Case No. EX-2008-0232
For Electric Utilities 4 CSR 240-23.030)

**COMMENTS OF KANSAS CITY POWER & LIGHT COMPANY
TO PROPOSED VEGETATION MANAGEMENT RULES**

Kansas City Power & Light Company (“KCPL”) hereby submits its comments in response to the Proposed Rules published in the *Missouri Register* on January 2, 2008. The Missouri Public Service Commission (“Commission”) proposes 4 CSR 240-23.030, Electrical Corporation Vegetation Management Standards and Reporting Requirements (“Vegetation Management Rule”). KCPL respectfully requests that the Commission consider these comments prior to taking further steps to finalize the rules.

In support hereof, KCPL offers as follows:

1. As a result of the power outages associated with a series of severe wind and ice storms and general concerns regarding day-to-day service reliability in parts of Missouri, the Commission held public hearings, conducted investigations, initiated a rulemaking proceeding, published proposed rules, held hearings, and sought to promulgate 4 CSR 240-23.030, Electrical Corporation Vegetation Management Standards and Reporting Requirements, in Case No. EX-2007-0214.

2. Due to procedural issues with the Secretary of State, the Commission’s Vegetation Management Rule is now the subject of a subsequent *Missouri Register* publication, comment period, and hearings. KCPL does not propose any changes to the Vegetation Management Rule previously adopted by the Commission, as published in the *Missouri Register* on January 2, 2008.

3. Case No. EX-2007-0214 yielded a carefully balanced and reasonable regulatory outcome. The rule developed in that case includes extensive provisions that will over time yield improvements in vegetation management practices, which when combined with improvements in infrastructure inspection and maintenance, will result in greater service reliability.

4. KCPL filed comments and supplemental comments, as well as provided sworn testimony, in Case No. EX-2007-0214 regarding the originally proposed Vegetation Management Rule. KCPL incorporates those comments and testimony herein by reference.

5. The proposed rule was developed through a collaborative process that resulted in a rule that meets the goals of the Commission and the operational needs of the utilities. Although, there are still concerns on the part of KCPL that some of the proposed requirements will result in costs that produce diminishing returns to the customers, KCPL recognizes the Commission's commitment to implementing this set of rules. KCPL submits no further comments on the final set of rules as proposed. However, making additional changes to this rule at this time may result in additional expenses and administrative inefficiencies. It is important to note that these changes in procedures are in addition to what KCPL had already implemented to improve their vegetation management practices prior to the Commission's adoption of the rule currently being considered in this rulemaking proceeding.

6. In Case No. EX-2007-0214, KCPL submitted cost estimates for vegetation management. If there are material changes to the previously adopted rule, KCPL's estimate would need to be changed to reflect those changes.

7. KCPL appreciates this opportunity to provide comments in this rulemaking proceeding and hopes that these comments are helpful in formulating reasonable policy in this

important area. KCPL respectfully requests that the Commission consider the foregoing comments when finalizing the proposed Vegetation Management Rule.

Respectfully submitted,

By: /s/ Curtis D. Blanc

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Dated: February 4, 2008

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing comments were served either electronically or via first class mail, postage pre-paid, on this 4th day of February, 2008 upon each party to this proceeding.

By: /s/ Curtis D. Blanc
Curtis D. Blanc