

# STEWART LAW FIRM, L.C.

SHAWN E. STEWART  
ATTORNEY AT LAW

September 20, 2005

FILED<sup>2</sup>

SEP 21 2005

Missouri Public  
Service Commission

Missouri Public Service Commission  
Colleen M. Dale, Secretary  
Attention: Data Center  
200 Madison Street, Suite 100  
P.O. Box 360  
Jefferson City, MO 65102

Re: WST, INC.

Dear Ms. Dale:

Enclosed please find one (1) original and eight (8) copies of an Application for Variance, and one (1) original and eight (8) copies of a Motion for Expedited Treatment, for filing for WST, Inc.. I am enclosing a copy to be file-stamped and returned to me at 4505 Madison Avenue, Kansas City, Missouri, 64111.

If you have any questions, please call me at (816) 751-0517.

Very truly yours,

STEWART LAW FIRM, L.C.



Shawn E. Stewart

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

**FILED<sup>2</sup>**

SEP 21 2005

Missouri Public  
Service Commission

In the Matter of the Application of )  
WST, Inc., a Missouri corporation )  
For a Variance from Kansas City )  
Power & Light Company's )  
General Rules and Regulations )  
Requiring Individual Metering )

Case No. \_\_\_\_\_

**MOTION FOR EXPEDITED TREATMENT**

Comes now WST, Inc. ("WST"), through its legal counsel, and requests this Commission to establish an expedited schedule for the consideration and entry of an order in the accompanying Application for a Variance from Kansas City Power & Light Company's General Rules and Regulations Requiring Individual Metering, and in support thereof states as follows:

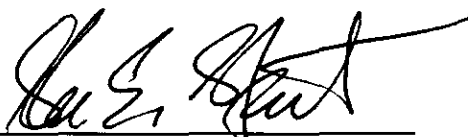
1. WST respectfully requests that the Commission act upon the accompanying Application for Variance by October 19, 2005.
2. The project for which a variance is being sought is in its final stages of construction, in anticipation of having units ready for closings on October 19, 2005. If the variance is not granted by then, WST and the buyers will incur irreparable harm and damage as a result of the failed closing dates.
3. The variance request was filed as soon as possible, after it was determined that it was needed. It was not until August 16, 2005 that Kansas City Power & Light Company ("KCPL") sent written notification to WST that KCPL would be requiring individual metering to each condominium unit. WST, through its legal counsel, responded to KCPL on August 30,

2005. KCPL replied to that letter on September 15, 2005, advising WST that a variance to KCPL's tariffs would be required.

WHEREFORE, WST, INC. respectfully requests this Commission to make and enter its Order as stated in the accompanying Application for Variance by October 19, 2005, or as soon as the Commission is able.

Respectfully submitted,

STEWART LAW FIRM, L.C.

By: 

SHAWN E. STEWART #49202  
4505 Madison Avenue  
Kansas City, Missouri 64111  
Telephone: (816) 751-0517  
Facsimile: (816) 751-0518  
Email: [stewartlaw@birch.net](mailto:stewartlaw@birch.net)

ATTORNEYS FOR APPLICANT