

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

Application of Kansas City Power & Light)	
Company for A Variance From the Provisions)	Case No.
Of 4 CSR 240-3.160 related to the Submission)	
Of A New Depreciation Study.)	

APPLICATION AND MOTION FOR EXPEDITED TREATMENT

Pursuant to 4 CSR. 240-2.060, 4 CSR 240-3.015, and 4 CSR 240-2.080(16), Kansas City Power & Light Company ("KCPL" or "Applicant") hereby respectfully submits to the Missouri Public Service Commission ("Commission") an application ("Application") for a variance from the provisions of 4 CSR 240-3.160 to allow it to delay the filing of a depreciation study, database, and property unit catalog until the filing of its 2009 Rate Case associated with the completion of Iatan 2. In support of its Application, KCPL states as follows:

I. APPLICANT

1. KCPL is a Missouri corporation with its principal office and place of business at 1201 Walnut, Kansas City, Missouri 64106-2124. KCPL is primarily engaged in the business of generating, transmitting, distributing, and selling electric energy in portions of eastern Kansas and western Missouri. KCPL is an electrical corporation and public utility as defined in Mo. Rev. Stat. § 386.020 (2000). KCPL provided its Certificate of Good Standing in Case No. EF-2002-315. It is incorporated herein by reference.

2. KCPL 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. KCPL has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court that involves customer service or rates, which has occurred

within three years of the date of this Application except as provided in Attachment No. 1. 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:

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II. EXTENSION TO SUBMIT DEPRECIATION STUDY

4. 4 CSR 240-3.160 related to the filing requirements for electric utility rate increase requests contains a provision that requires the filing of a depreciation study, database and property unit catalog by the electric utility with the case. 4 CSR 240-3.160(A) also states:

However, an electric utility need not submit a depreciation study, database or property unit catalog to the extent that the commission's staff received these items from the utility during the three (3) years prior to the utility filing for a general rate increase or before five (5) years have elapsed since the last time the commission's staff received a depreciation study, database and property unit catalog from the utility.

5. KCPL submitted its last depreciation study, database and property unit catalog to the Commission Staff on March 31, 2005. Pursuant to 4 CSR 240-3.160(A), KCPL believes

that it would be required to file a new depreciation study in any rate case filed after March 31, 2008, absent a variance from this rule.

6. At present, KCPL is anticipating filing a 2008 Rate Case in June or July 2008 to coincide with the expected in-service date of the installation of the environmental equipment at Iatan 1. However, KCPL does not believe that there would be recommended changes to its proposed depreciation rates as a part of the 2008 Rate Case. KCPL is also anticipating filing a 2009 Rate Case in the second half of 2009 to reflect the expected in-service date of coal-fired plant, Iatan 2, which is currently being constructed. Material changes to depreciation rates are more likely to be proposed in the 2009 Rate Case to reflect changes in plant accounts and investments associated with Iatan 2.

7. Given the changes in the plant accounts, investments and depreciation rates associated with Iatan 2, KCPL believes it would be reasonable and prudent to delay the filing of a new depreciation study, database and property unit catalog until the 2009 Rate Case. KCPL respectfully requests that it be allowed to delay the filing of its depreciation study, database and property unit catalog until its 2009 Rate Case that would include the major investments associated with the completion of Iatan 2.

MOTION FOR EXPEDITED TREATMENT

8. Pursuant to 4 CSR 240-2.080(16), KCPL is requesting expedited treatment of this application.

9. KCPL requests approval of this application as soon as possible, but no later than March 15, 2008 to avoid the need to prepare and submit a depreciation study in conjunction with the 2008 Rate Case which is anticipated to be filed by June or July, 2008. Given the substantial amount of time and resources needed to prepare a depreciation study, it would be necessary to

necessary to begin the preparation of a new depreciation study immediately, if this application is not granted. This substantial effort will be avoided if the variance is granted. There will be no negative effect on KCPL's customers or the general public if the Commission acts by the date requested herein.

10. Staff counsel has indicated to the undersigned that Staff has no objection to this Application and motion.

WHEREFORE, for the foregoing reasons, KCPL respectfully requests that the Commission grant it a variance or waiver from 4 CSR 240-3.160 to permit the Company to delay filing a new depreciation study, database and property unit catalog until its 2009 Rate Case which is currently planned to be filed in the second half of 2009.

Respectfully submitted,

/s/ James M. Fischer

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**ATTORNEY FOR
KANSAS CITY POWER & LIGHT COMPANY**

Attachment No. 1

Zimmerman, Adam v. Kansas City Power & Light Company, Case No. EC-2008-0195.

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 8th day of February, 2008, to all counsel of record.

/s/ James M. Fischer

James M. Fischer

AFFIDAVIT

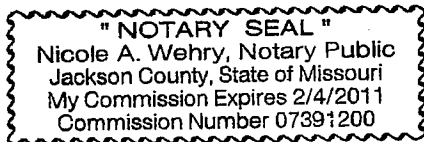
State of Missouri)
) ss
County of Jackson)

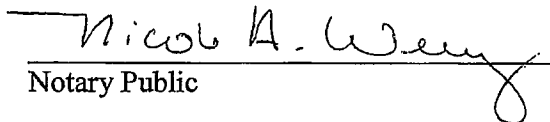
I, Tim M. Rush, having been duly sworn upon my oath, state that I am the Director, Regulatory Affairs of Kansas City Power & Light Company ("KCPL"), that I am duly authorized to make this affidavit on behalf of KCPL, and that the matters and things stated in the foregoing application and appendices thereto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



Tim M. Rush

Subscribed and sworn before me this 7th day of February, 2008.





Notary Public