

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

In the Matter of the Application of Kansas)
City Power & Light Company and KCP&L)
Greater Missouri Operations Company for) Case No.: EU-2012_____
the Issuance of an Depreciation Authority)
Order Relating to their Electrical)
Operations

**APPLICATION OF KANSAS CITY POWER & LIGHT COMPANY AND
KCP&L GREATER MISSOURI OPERATIONS COMPANY FOR A
DEPRECIATION AUTHORITY ORDER**

Pursuant to Mo. Rev. Stat. 386.250 and 393.140¹ and 4 CSR 240-2.060, Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”), collectively referred to as “Companies” and “Applicants,” hereby request that the Missouri Public Service Commission (“Commission”) issue an Depreciation Authority Order (“DAO”) authorizing each Applicant to depreciate certain accounts with a specific depreciation rate.

1. KCP&L and GMO are corporations duly organized and existing under the laws of the State of Missouri and the State of Delaware, respectively. Applicants are duly authorized to conduct business in Missouri. Their principal office and place of business is located at 1200 Main Street, Kansas City, Missouri 64105. Under operating authority granted by the Commission, the Applicants provide service in Missouri as electric utilities and also as a heating company (GMO only). GMO provides service under the MPS rate jurisdiction (“MPS”) and the L&P rate jurisdiction (“L&P”). Certified copies of KCP&L’s Certificate of Good Standing were filed in Case No. EM-2000-753 and GMO’s Certificate of Authority to do business as a foreign corporation was filed in Case No. EU-2002-1053, and those documents are incorporated herein by reference, as allowed by 4 CSR 240-2.060(1)(G).

¹ Unless otherwise noted, all citations are to the Revised Statutes of Missouri (2010), as amended.

2. Applicants are each an “electrical corporation,” a “heating company” (GMO only), and a “public utility” as those terms are defined in section 386.020, RSMo. 2000; therefore, Applicants are subject to the jurisdiction and regulatory supervision of the Commission, as provided by law.

3. Applicants have no final, unsatisfied judgments or decisions against them from state or federal regulatory agencies or courts that involve customer service and that have occurred within the three years immediately preceding the filing of this application, except as stated in Appendix 1. Applicants also have no overdue Commission annual reports or assessment fees.

4. Pleadings, notices, orders, and other correspondence and communications related to this application should be sent to the undersigned counsel and also to:

Tim M. Rush
Director, Regulatory Affairs
Kansas City Power & Light Company
1200 Main Street
Kansas City, MO 64105
Tel.: (816) 556-2344
E-mail: tim.rush@kcpl.com

5. Due to the recent construction of Iatan 2, as well as other construction projects, assets have been recorded in accounts where there is no Commission established depreciation rate.

6. KCP&L and GMO Account 30310 is entitled “Misc. Intangible – Iatan Hwy & Bridge”. KCP&L and GMO request that an Account 30310 depreciation rate be authorized based on a rate equal to the composite remaining life of Iatan 2 of 47.7 years or 2.10% which was incorporated into the Iatan 2 depreciation rates authorized by the Commission in File Nos. ER-2010-0355 and 0356.

7. KCP&L Account 34600 is entitled “Other Production – Miscellaneous Power Plant Equip.” Equipment in this account includes miscellaneous equipment in and about the power generating plants devoted to general station use and not properly includible in any other accounts. Such equipment includes testing equipment, compressors and pumps. The costs recorded in Account 346 are similar to those recorded in Account 316 (Stm Prod - Misc. Power Plant Equipment); therefore, KCP&L requests that the depreciation rate for Account 346 be authorized at 2.27%, the same depreciation rate authorized for this account in File No. ER-2010-0355.

8. Applicants presume that the Companies’ Account 30310 depreciation rates and KCP&L’s Account 34600 depreciation rate established in this case would be revised when the Applicants submit their next depreciation study and the associated depreciation rates are authorized by the Commission.

9. Granting the DAO requested herein will not impact customer rates. Although a DAO puts Applicants in a position where they can, in future rate proceedings, request depreciation expense recovery in rates, a Commission order authorizing a DAO carries with it no guarantee that such rate recovery will be allowed. Applicants will seek recovery of these costs in general rate case proceedings.

10. Applicants do not believe that a request for a DAO should be considered a contested case subject to the notice requirement of 4 CSR 240-4.020(2). Applicants filed this application as soon as practicable so that the Commission can establish depreciation rates for the new assets. Should the Commission conclude that the filing of this Application is likely to be contested case and subject to the notice of filing requirement of 4 CSR 240-4.020(2), Applicants request a waiver for good cause shown pursuant to 4 CSR 240-4.020 (2)(B).

11. WHEREFORE, for the reasons stated above, Applicants request that the Commission grant Applicants' application and:

a) issue a DAO to each Applicant authorizing each Applicant to utilize a 2.10% depreciation rate for the assets recorded in Account 30310

(b) issue a DAO to KCP&L authorizing it to utilize a 2.27% depreciation rate for the assets recorded in Account 34600.

b) provide the Applicants such other relief that the Commission believes is necessary and appropriate and that is not inconsistent with the DAOs requested in this application.

Respectfully submitted,

/s/ Roger W. Steiner

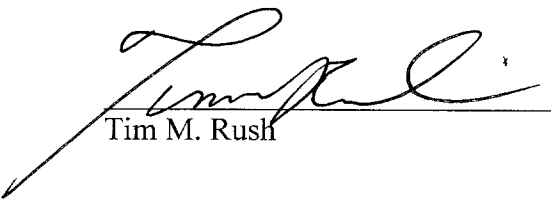
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ATTORNEY FOR KANSAS CITY POWER &
LIGHT COMPANY AND KCP&L GREATER
MISSOURI OPERATIONS COMPANY

VERIFICATION

STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

Tim M. Rush, being first duly sworn, on his oath and in his capacity as Director, Regulatory Affairs, states that he is authorized to execute this Application on behalf of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company, and has knowledge of the matters stated in this Application, and that said matters are true and correct to the best of his knowledge, information and belief.



Tim M. Rush

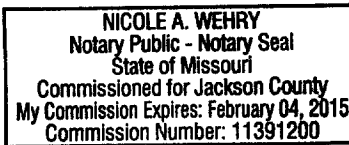
Subscribed and sworn to before me this 12th day of April , 2012



Notary Public

My commission expires:

Feb 4, 2015



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application was served either by electronic mail or by first class mail, postage prepaid, on this 13th April, 2012, upon:

General Counsel
Missouri Public Service Commission
P.O. Box 360
200 Madison St., Suite 800
Jefferson City, MO 65102

Lewis Mills
Office of the Public Counsel
P.O. Box 2230
200 Madison St., Suite 650
Jefferson City, MO 65102

/s/ Roger W. Steiner

Roger W. Steiner

Appendix 1

Pending Actions or Final Unsatisfied Judgments or Decisions

The following is a listing of Applicants' pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three years of the date of this application:

KCP&L Greater Missouri Operations Company-Customer Complaints in Missouri.

Patricia Mincks v. Kansas City Power & Light Company Case No. EC-2012-0325.

Ag Processing, Inc., a Cooperative, v. KCP&L Greater Missouri Operations Company, Case No. HR-2012-0259.