

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

Application of Kansas City Power & Light)	
Company for the Opening of a Proceeding to)	Case No. EO-2008-0224
File Status Report on Wind Investment)	

STAFF STATUS REPORT

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), through the Office of General Counsel, and submits the instant Staff status report. In support thereof, the Staff respectfully states as follows:

1. On May 28, 2008, the Staff filed a status report in this case in which it recommended that based on what it and other parties had been told by Kansas City Power & Light Company (KCPL) at a May 22, 2008 quarterly infrastructure construction / investment status update, provided for in the KCPL Regulatory Plan (Case No. EO-2005-0329), the Commission keep this case open and expect a substantive filing by KCPL by July 1, 2008. The Staff and other parties in attendance at the quarterly status update meeting held on May 22, 2008 were told by KCPL that it would be making a substantive filing within approximately a month regarding its plan for additional wind facilities for 2009.

2. In its June 13, 2008 Order Granting Leave To Late-File Status Report And Order Directing Filing, the Commission directed in the event KCPL did not file the anticipated pleading, that the Staff file a further status report no later than July 15, 2008.

3. KCPL has not filed the anticipated pleading, but on July 14, 2008 filed a Status Update Of Kansas City Power & Light Company Concerning Second 100 MW Wind Generation Facility. In said filing, KCPL stated “KCPL will provide a subsequent update concerning its

ultimate decision in the near future, and invites any additional input concerning the potential installation of such a facility.”

4. In response the Staff would suggest that the Commission direct KCPL to file a more complete explanation than what KCPL submitted on July 14, 2008.

5. The Staff would note that, as part of the KCPL Regulatory Plan Stipulation And Agreement in Case No. EO-2005-0329, the second 100 MW of wind for KCPL is shown only for 2008 and KCPL’s 2008 Rate Case. The second 100 MW of wind is not shown for a subsequent year and rate case. The following language appears at pages 39-40 of the KCPL Regulatory Plan Stipulation And Agreement after the sentence that states that the 2008 Rate Case will include prudent expenditures for the installation of 100 MW of wind generation:

. . . The Signatory Parties agree that they will not take the position that these investments should be excluded from KCPL’s rate base on the ground that the projects were not necessary or timely, or that alternative technologies should have been used by KCPL, so long as KCPL proceeds to implement the Resource Plan described herein (or a modified version of the Resource Plan where the modified plan has been approved by the Commission) and KCPL is in compliance with Paragraph III.B.1(o) “Resource Plan Monitoring.” Nothing in this Agreement shall be construed to limit any of the Signatory Parties’ ability to inquire regarding the prudence of KCPL’s expenditures, or to assert that the appropriate amount to include in KCPL’s rate base or its cost of service for these investments is a different amount (e.g., due to imprudent project management) than that proposed by KCPL.¹

Wherefore the Staff files the instant status report recommending that the Commission direct KCPL to file a more complete explanation than it submitted on July 14, 2008.

Respectfully submitted,

/s/ Steven Dottheim
Steven Dottheim
Chief Deputy General Counsel

¹ This same language respecting the Flue Gas Desulphurization (FGD) unit and Baghouse environmental enhancements to be installed at La Cygne 1, but relating to KCPL’s 2009 Rate Case, appears at pages 42-43 of the KCPL Regulatory Plan Stipulation And Agreement. The FGD unit and Baghouse at La Cygne 1 now will not be completed until sometime after the KCPL Regulatory Plan which will be after the 2009 Rate Case.

Missouri Bar No. 29149

Dennis L. Frey
Senior Counsel
Missouri Bar No. 44697

Attorneys for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-7489 (Voice)
(573) 751-9285 (Fax)
steve.dottheim@psc.mo.gov (e-mail)
(573) 751-8700 (Voice)
(573) 751-9285 (Fax)
denny.frey@psc.mo.gov (e-mail)

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 15th day of July 2008.

/s/ Steven Dottheim