BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Kansas City)	
Power & Light Company for Authority to Issue)	Case No. EF-2005-0498
Debt Securities)	

STAFF MOTION FOR EXTENSION OF TIME TO FILE RECOMMENDION

Comes now the Staff of the Missouri Public Service Commission (Staff) and requests an extension of time from August 23, 2005 to August 31, 2005 to file the Staff recommendation regarding Kansas City Power & Light Company's (KCPL's) proposed Financing Plan for the 2005-2009 period relating to the KCPL Experimental Regulatory Plan filed and approved in Case No. EO-2005-0329. In support thereof, the Staff states as follows:

- 1. In response to an Order Directing Filing, directing the Staff to file a status report in which it indicates the date upon which the Staff anticipates filing its recommendation and memorandum, the Staff filed a Status Report in which it stated that it would file its recommendation and memorandum no later than August 23, 2005.
- 2. In its filing on June 22, 2005, commencing the instant case, KCPL stated that the information in its Exhibit 3, pro forma financial statements as of March 31, 2005 giving effect to the transactions and accounting adjustments covered by its filing, would be filed as soon as practicable after the Commission issued a Protective Order. The Commission issued a Protective Order on June 27, 2005. KCPL filed the indicated pro forma financial information on August 9, 2005 and even on that date the pro forma financial information filed by KCPL was as of

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¹ The actions and procedures that are being proposed by KCPL are designed in part to enable KCPL to undertake the expenditures covered by the KCPL Experimental Regulatory Plan and maintain an investment grade rating for its debt.

December 31, 2004 and not March 31, 2005. In its filing on June 22, 2005, KCPL also stated that it would late file Exhibit 2, a certified copy of the resolutions of the KCPL Board of Directors authorizing, among other things, the debt securities to be issued under the authorization sought from the Commission. KCPL filed Exhibit 2, the resolutions of the KCPL Board of Directors, on August 9, 2005.

- 3. In its filing on August 9, 2005, KCPL stated that it anticipated that it would make a filing of its Registration Statement with the U.S. Securities and Exchange Commission (SEC) on August 12, 2005 and that it would make a concurrent filing of that document (late-filed Exhibit 1) with this Commission.
- 4. On August 18, 2005, KCPL filed with the Commission the pro forma financial information, as of March 31, 2005, comprising late-filed Exhibit 3. KCPL also advised that it had not yet made a filing of a Registration Statement with the SEC, and the timing and form of that Registration Statement were still uncertain. KCPL stated in its filing that it was providing that date "a statement of how the securities are to be sold," pursuant to 4 CSR 240-3.120(1)(C)(3).
- 5. The Staff's submission of data requests to KCPL, respecting the transactions for which authorization is being sought by KCPL, has been dependent, in part, on the filings that were made by KCPL on August 9 and 18, 2005. The Staff received responses to the last of its data requests on August 19, 2005.
- 6. The Staff contacted KCPL about the Staff's intention to request an extension of time to August 31, 2005 for the filing of its recommendation, and KCPL indicated that it has no objection to the Staff's request for an extension to August 31, 2005. The only parties to the instant case are KCPL, the Office of the Public Counsel (Public Counsel) and the Staff. None of

the other parties to KCPL's Experimental Regulatory Plan docket, Case No. EO-2005-0329, filed for intervention.

7. The Staff does not believe that any party will be harmed by the granting of its request for an extension of time to file its recommendation. The Staff does not make its request so as to unduly delay these proceedings.

Wherefore the Staff requests that the Commission grant it an extension of time from August 23, 2005 to August 31, 2005 for the filing of the Staff's recommendation in the instant case.

Respectfully submitted, DANA K. JOYCE General Counsel

/s/Steven Dottheim

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 22nd day of August 2005.

/s/ Steven Dottheim