

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

Joint Application of Kansas City Power & Light)	
Company and KCP&L Greater Missouri)	
Operations Company for a Variance from the)	
Provisions of 4 CSR 240-20.100(4)(H)(2) Related)	<u>File No. EE-2011-0119</u>
to Tariff Submission Dates.)	

STAFF RESPONSE TO VARIANCE REQUEST

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through its attorney, and submits to the Missouri Public Service Commission (“Commission”) its *Response* as follows:

1. On October 29, 2010, Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company (collectively, “Joint Applicants”) filed a Joint Application asking the Commission for a variance from a provision of the Commission’s renewable energy standards rule to allow the Joint Applicants to delay filing a discretionary standard offer contract for the purchase of solar renewable energy credits beyond the November 1 submission date specified in Commission Rule 4 CSR 240-20.100(4)(H)(2).

2. On October 29, 2010 the Commission ordered that any party wishing to respond to the Joint Application should do so no later than November 18, 2010.

3. The Staff has only one objection to the Joint Applicant’s request for a variance from the provisions of 4 CSR 240-20.100(4)(H)—that the Joint Applicants have provided no date by which they plan to file a standard offer contract with the Commission, or at the very least an expiration date of the variance. The Staff objects to the Joint Applicant’s request on the ground that a completely open-ended variance combined with a lack of any additional

information from the requesting party is not appropriate. The Staff recommends that the Commission order the Joint Applicants to provide more information, in particular as to a variance ending date, on an expedited basis.

WHEREFORE the Staff states it objects to the completely open-ended nature of the variance request without the provision of further information, and respectfully requests the Commission order the Joint Applicants to provide more information on an expedited basis.

Respectfully submitted,

/s/ Meghan E. McClowry

Meghan E. McClowry

Legal Counsel

Missouri Bar No. 63070

Attorney for the Staff of the
Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 751-6651 (Telephone)

(573) 751-9285 (Fax)

meghan.mcclowry@psc.mo.gov

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed, sent by facsimile or hand-delivered to all counsel of record this 18th day of November, 2010.

/s/ Meghan E. McClowry