BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

n the Matter of the 2011 Resource Plan))	
of Kansas City Power & Light Company)	Case No. EE-2011-0032	

MISSOURI DEPARTMENT OF NATURAL RESOURCES' RESPONSE TO APPLICATION FOR WAIVER

COMES NOW the Missouri Department of Natural Resources (MDNR) and submits the following Response to the Application for Waiver Concerning Kansas City Power & Light Company's Filing Date for Its Next Integrated Resource Plan Submission by Kansas City Power & Light Company ("KCP&L").

On August 5, 2010, KCP&L filed the above noted application seeking to delay the filing date of its next Integrated Resource Pan ("IRP"), and on August 25, 2010, KCP&L filed a Motion to Amend the above noted application. KCP&L states that based on the Commission's current IRP rules, in particular 4 CSR 240-22.080(3), KCP&L is scheduled to file its next IRP November 5, 2011. KCP&L notes that the Commission is in the process of revising the IRP rules, including 4 CSR 240-22.080(3). The proposed revision to 4 CSR 240-22.080(3) would require KCP&L to file an IRP on April 1, 2012.

MDNR agrees that KCP&L appears to be facing an undesirable predicament that could require it to file two IRPs just five (5) months apart. However, the proposed revisions to the IRP rule have not yet been approved by the Commission, and there is no absolute certainty that the IRP rule revisions will become effective and possibly impose the April 1, 2012, deadline on KCP&L.

Due to this uncertainty, and MDNR's concerns with the ramifications of a delay in KCP&L's next IRP filing, MDNR recommends that the Commission delay ruling on

KCP&L's applications and order the parties to convene a conference to determine appropriate contingencies and conditions for KCP&L's next IRP filing. In this proposed conference, the parties will be able to examine and discuss the status of KCP&L's current and future integrated resource plans, implications of delaying the filing, and appropriate conditions and contingencies that should accompany any adjustment to the filing date for KCP&L's next IRP filing.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that the Commission: 1) delay ruling on the Application for Waiver Concerning Kansas City Power & Light Company's Filing Date for Its Next Integrated Resource Plan Submission by KCP&L; 2) direct the parties to this case to propose a schedule for a conference to discuss the items noted above and any others the parties deem pertinent to the scheduling of KCP&L's next IRP; and, 3) direct the parties to report on the outcome of the conference in a timely manner.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 7th day of September, 2010.

/s/ Sarah Mangelsdorf Sarah Mangelsdorf