

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

In the Matter of the Resource Plan of Kansas)	
City Power & Light Company Pursuant to)	
4 CSR 240-22.)	Case No. EO-2007-0008

**MOTION TO LATE-FILE STAFF’S RESPONSE
AND STAFF'S RESPONSE TO COMMISSION ORDER**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and requests leave to late-file its response to the Commission’s July 18, 2006 Order Directing Notice, Setting Date For Submission Of Intervention Requests, And Scheduling A Prehearing Conference which directed the Staff to “file its response to the request [by Kansas City Power & Light Company (KCPL)] for extension of time and request for waivers no later than August 17, 2006.” In its Application filed July 5, 2006, that initiated this case, KCPL requested extensions of time and one-time waivers of certain provisions of the Commission’s electric utility resource planning requirements set out in Chapter 22 of Division 240 of Title 4 of the Code of State Regulations. In response, the Staff states as follows:

1. At the present time, the Staff’s response to KCPL’s requests for extensions of time and one-time waivers is that the Staff has yet to determine whether it opposes or supports the various requests of KCPL. The Staff has insufficient information at this time to make these determinations.

2. The Commission in its July 18, 2006 Order, in ordered paragraph 5, set a prehearing conference for 10:00 a.m., on August 21, 2006, in Room 305 of the Commission’s offices at the Governor Office Building, 200 Madison Street, Jefferson City, Missouri.

3. The Staff hopes that during or within a short time frame after the prehearing conference scheduled for August 21, 2006, the Staff will obtain more information from KCPL so

the Staff may be able to offer a more complete response to the Commission, although not necessarily a definitive response, regarding KCPL's requests for extensions of time and one-time waivers. In offering the instant response, the Staff notes the provisions of 4 CSR 240-22.080, which state in part as follows:

(5) The staff shall review each compliance filing required by this rule and shall file a report not later than one hundred twenty (120) days after each utility's scheduled filing date that identifies any deficiencies in the electric utility's compliance with the provisions of this chapter, any major deficiencies in the methodologies or analyses required to be performed by this chapter and any other deficiencies which, in its limited review, the staff determines would cause the electric utility's resource acquisition strategy to fail to meet the requirements identified in 4 CSR 240-22.010(2)(A)-(C). . . .

4. The Staff suggests that the Commission direct the Staff to submit a Status Report no later than August 28, 2006.

5. Undersigned counsel apologizes for any inconvenience this late filing has caused.

WHEREFORE, the Staff of the Missouri Public Service Commission requests leave to late-file its response to the Commission's July 18, 2006 Order, and states that at this time it has yet to determine whether it opposes or supports Kansas City Power & Light Company's requests for extensions of time and one-time waivers of certain provisions of the Commission's Electric Utility Resource Planning requirements set out in Chapter 22 of Division 240 of Title 4 of the Code of State Regulations, but that the Staff proposes to provide a Status Report to the Commission by August 28, 2006.

Respectfully submitted,

/s/ Steven Dottheim

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed first-class postage prepaid, hand-delivered, transmitted by facsimile or emailed to all counsel of record this 18th day of August 2006.

/s/ Steven Dottheim