

FINNEGAN, CONRAD & PETERSON L.C.
ATTORNEYS AND COUNSELORS AT LAW
1209 PENNTOWER OFFICE CENTER
3100 BROADWAY
KANSAS CITY, MISSOURI 64111

(816)753-1122
FACSIMILE: (816)756-0373

JEREMIAH D. FINNEGAN
STUART W. CONRAD
C. EDWARD PETERSON

Internet: jfinnegan@fpclaw.com

April 4, 2005

FILED

APR 04 2005

**Missouri Public
Service Commission**

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

**RE: In the Matter of a Proposed Regulatory Plan of Kansas City Power
and Light Company Case No. EO-2005-0329**

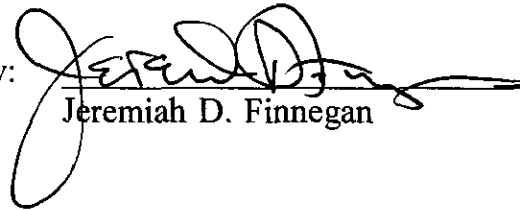
Dear Mr. Roberts:

Enclosed find the Objection of Jackson County, Missouri to Stipulation and Agreement filed in this case on March 28, 2005. Please file and call to the attention of the Commission.

Very truly yours,

FINNEGAN, CONRAD & PETERSON, L.C.

By:


Jeremiah D. Finnegan

JDF:ach

Enclosures

cc: All Parties of Record
Ed Rucker

FILED

APR 04 2005

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

**Missouri Public
Service Commission**

**In the Matter of a Proposed Regulatory)
Plan of Kansas City Power & Light Company)**

Case No. EO-2005-0329

**OBJECTION OF JACKSON COUNTY, MISSOURI
TO STIPULATION AND AGREEMENT**

COMES NOW Jackson County, Missouri ("Jackson County" or "County") and pursuant to Rule 4 CSR 240-2.115 of the Commission's Rules of Practice and Procedure respectfully objects to the nonunanimous Stipulation and Agreement filed by some of the participants to numerous informal meetings between Kansas City Power & Light Company ("KCPL") and some of the possible interested parties for the following reasons:

1. Jackson County is a first class county and political subdivision of the State of Missouri. The County participated in some of the informal meetings and was listed as one of the Signatory Parties and listed on the signature blocks despite the fact that the County had not signed the Stipulation and Agreement as is clearly shown on the Signature pages.

2. Communications, orders and decisions in this Matter should be addressed to:

Edward B. Rucker
County Counselor
Jackson County Courthouse
415 E. 12th Street
Kansas City, Missouri 64106
(816)881-3355 Fax (816)881-3398
erucker@jacksongov.org

Jeremiah D. Finnegan
Finnegan, Conrad & Peterson, LC

1209 Penntower Building
3100 Broadway
Kansas City, Missouri 64111
(816)753-1122 Fax (816)756-0373
jfinnegan@fcplaw.com

3. Pursuant to Rule 4 CSR 240-2.115(2)(A), a Stipulation and Agreement not entered into by all parties is a "nonunanimous stipulation and agreement".

4. Pursuant to Rule 4 CSR 240-2.115(2)(B), each party shall have seven (7) days from the date of filing of a nonunanimous stipulation and agreement to file an objection thereto and failure to file a timely objection shall constitute a full waiver of that parties right to a hearing.

5. Pursuant to Rule 4 CSR 240-2.115(2)(C), if no party timely objects to a nonunanimous stipulation and agreement, the Commission may treat the nonunanimous stipulation and agreement as a unanimous stipulation and agreement.

6. Pursuant to Rule 4 CSR 240-2.115(2)(C), a nonunanimous stipulation and agreement to which a timely objection has been filed shall be considered to be merely a position of the signatory parties to the stipulated position except that no party shall be bound by it and all issues shall remain for determination after hearing.

7. Because Jackson County is listed as a Signatory Party, the County is concerned that if it fails to object, the stipulation and agreement will be considered unanimous and the County will have waived any right to a hearing.


WHEREFORE, pursuant to Rule 4 CSR 240-2.115 of the Commission's Rules of Practice and Procedure, Jackson County:

1. Respectfully objects to the Stipulation and Agreement;
2. Requests that the Commission consider the Nonunanimous Stipulation and Agreement to be merely the position of the Signatory Parties, who actually signed it;
3. Such further and other relief as the Commission may deem just and equitable.

Respectfully submitted,

EDWARD B. RUCKER
COUNTY COUNSELOR
Jackson County Courthouse
415 E. 12th Street
Kansas City, Missouri 64106
(816)881-3355 Fax (816)881-3398

FINNEGAN, CONRAD & PETERSON, LC

By: 
JEREMIAH D. FINNEGAN, #18416
3100 Broadway, Suite 1209
Kansas City, Missouri 64111
(816)753-1122 Fax (816)756-0373
jfinnegan@fcplaw.com

ATTORNEYS FOR COMPLAINANT

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Complaint has been served on all parties of record this 4th day of April, 2005.


Jeremiah D. Finnegan