

**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

**SECOND STATUS REPORT**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) in response to its statement in its Status Report filed on August 28, 2006 that it would file another Status Report by September 15, 2006 and the Missouri Public Service Commission's (Commission) September 13, 2006 Order Directing Status Report ordering the Staff to file a Status Report no later than September 15, 2006. For its Second Status Report, the Staff states as follows:

1. The Staff in its prior Status Report indicated that at the August 21, 2006 early prehearing conference the Staff and the Office of the Public Counsel (Public Counsel) requested certain information from Kansas City Power & Light Company (KCPL). Even though KCPL indicated that it would not take long to address the requests of the Staff and Public Counsel because purportedly much of the information requested is actually in KCPL's July 5, 2006 filing, KCPL did not provide the Staff and Public Counsel with any additional information until after 5:00 p.m. on Thursday, September 14, 2006.

2. The volume of material provided by KCPL on September 14, 2006 was small. Nonetheless, generally the members of the Staff involved in the instant case were also involved in The Empire District Electric Company rate increase case, Case No. ER-2006-0315, which concluded approximately two weeks of evidentiary hearings on Thursday, September 14, 2006. As a consequence, the Staff has not had an opportunity to focus on the information provided by KCPL on September 14, 2006.

3. The Staff notes that at the same time the Commission has directed the Staff to respond to KCPL's Application for Extensions of Time and Waivers Concerning Certain of the Commission's Integrated Resource Plan Reporting Requirements, the Office of the Public Counsel (Public Counsel), the Missouri Department of Natural Resources (MDNR) and Praxair, Inc. (Praxair) are also parties to the instant docket. The Staff suspects it is an indication of the overwhelming level of activity at the Commission that these parties have not indicated to the Commission that they believe that the Commission should be interested in receiving responses from them regarding KCPL's Application for Extensions of Time and Waivers Concerning Certain of the Commission's Integrated Resource Plan Reporting Requirements. The Staff has not reached any definitive conclusions yet, but anticipates that its response may not necessarily be the same response that these other parties might offer to the Commission regarding the requests of KCPL.

4. 4 CSR 240-22.080 (5) requires the Staff to review KCPL's compliance filing and file a report not later than one hundred twenty (120) days after KCPL's July 5, 2006 filing date, i.e., by November 2, 2006, that identifies any deficiencies in KCPL's compliance with the provisions of Chapter 22, any major deficiencies in the methodologies or analyses required to be performed pursuant to Chapter 22 and any other deficiencies which in its limited review the Staff determines would cause KCPL's resource acquisition strategy to fail to meet the requirements in 4 CSR 240-22.010(2)(A)-(C). 4 CSR 240-22.080 (6) allows Public Counsel and any intervenor not later than one hundred twenty (120) days after KCPL's July 5, 2006 filing date, i.e., by November 2, 2006, to file a report or comments based on a limited review that identifies any deficiencies in KCPL's compliance with the provisions of Chapter 22, any deficiencies in the methodologies or analyses required to be performed by Chapter 22 and any other deficiencies

which in the party's limited review it believes would cause KCPL's resource acquisition strategy to fail to meet the requirements in 4 CSR 240-22.010(2)(A)-(C).

5. The Staff previously noted that various of the parties in the Union Electric Company, d/b/a AmerenUE, Chapter 22 compliance filing case, Case No. EO-2006-0240, requested additional time to make the filings pursuant to 4 CSR 240-22.080(5) and (6) and that proceeding in a similar manner may be necessary in this case. The Staff believes that it is very likely that at least some of the non-KCPL parties will ultimately be forced by circumstances to request additional time from the impending November 2, 2006 filing date for the reasons set out above and previously noted.

Wherefore the Staff submits this pleading as its Second Status Report due no later than September 15, 2006.

Respectfully submitted,

/s/ Steven Dottheim

Steven Dottheim  
Chief Deputy General Counsel  
Missouri Bar No. 29149

Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-7489 (Telephone)  
(573) 751-9285 (Fax)  
e-mail: [steve.dottheim@psc.mo.gov](mailto:steve.dottheim@psc.mo.gov)

### **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 15th day of September 2006.

/s/ Steven Dottheim