

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

In the Matter of the Application of Kansas City)
Power & Light Company for Approval to)
Make Certain Changes in its Charges for)
Electric Service to Implement its Regulatory)
Plan.)

File No. ER-2010-0355
Tariff No JE-2010-0692

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for)
Approval to Make Certain Changes in its)
Charges for Electric Service.)

File No. ER-2010-0356
Tariff No. JE-2010-0693

**ORDER OF ISSUES, WITNESSES AND CROSS-EXAMINATION AND
MOTION FOR PREHEARING CONFERENCE**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and states:

After soliciting input from the other parties and receiving some, based on the list of issues it filed Friday, January 7, 2011,¹ Staff has attempted to prepare a hearing schedule with an order of issues, witnesses (by party) and cross-examination. This pleading has not been fully vetted with the parties in these cases, but is Staff’s best effort to identify the witnesses to the list of issues Staff filed Friday, January 7, 2011, and provide the most efficient order in which to try them, while keeping the issues with the greatest dollar revenue requirement impact early in the schedule. Another primary consideration in this schedule is that Staff witnesses in these cases are performing the true-up. Therefore, some of their issues are scheduled early to allow them to perform the true-up. Despite Staff’s best interests to balance the competing interests in developing this schedule, Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company have advised Staff that they want the Iatan issues to be heard first. The

¹ DOE has advised that it should be added to the list of entities witness Gorman is testifying on behalf of regarding cost of capital—issues nos. 57-59 and 81.

Iatan issues are only one area of these cases—comprising thirty-four (34) of the ninety-seven (97) issues listed (excluding subparts)—which leaves sixty-three (63) other issues for the Commission to hear. Staff believes that a schedule where the Commission begins hearing the Iatan issues the first full week of the hearings, leaving the first four-day week and last full week for hearing the remaining sixty-three (63) issues, is the most efficient way to hear all of the Kansas City Power & Light Company specific and the common issues. Given the disagreement of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company to this hearing schedule, Staff suggests the Commission immediately call a prehearing conference to resolve the order in which issues will be heard starting next Tuesday, January 18, 2011.

In this hearing schedule Staff is not certain it has correctly identified all of the witnesses to each of the issues, but has attempted to do so. While it received some input from other parties as to witness availabilities, Staff does not know how practical the order of witnesses presented below is, and certainly does not represent it is complete. Due to limitations on the availabilities of Company witness Hadaway and Industrials witness Gorman, Staff has listed the cost of capital issues to be tried starting on January 20, 2011, and has listed that the Iatan issues be tried starting the second week of the evidentiary hearings, both to start those days regardless of the progress through the other scheduled issues. Staff anticipates this hearing schedule will be updated when or before hearings start on January 18, 2011. The listing of witnesses for each party provided is not intended to indicate the order in which that party may call its witnesses on the issue, but the order in which each party is to present its witnesses is intended.

Parties in these proceedings are identified in this pleading as follows:

- KCPL—Kansas City Power & Light Company
- GMO—KCP&L Greater Missouri Operations Company

- Staff—Staff of the Public Service Commission
- Public Counsel—Office of the Public Counsel
- Empire—The Empire District Electric Company
- MDNR—Missouri Department of Natural Resources
- DOE/NNSA—United States Department of Energy/National Nuclear Security Administration
- Jackson County—Jackson County, Missouri
- KCPL Industrials— Ford Motor Company, Midwest Energy Users’ Association, Missouri Industrial Energy Consumers, and Praxair, Inc.
- GMO Industrials—Federal Executive Agencies, Sedalia Industrial Energy Users’ Association, and Ag Processing, Inc.
- MRA—Missouri Retailers Association
- Kansas City—City of Kansas City
- MGE—Southern Union Company d/b/a Missouri Gas Energy
- Robert Wagner
- AARP/CCM—AARP and Consumers Council of Missouri
- MJMEUC—Missouri Joint Municipal Electric Utility Commission
- Hospitals—Carondelet Health, Crittenton Children’s Center, HCA Midwest Health System, North Kansas City Hospital, Research Medical Center, Research Psychiatric Center, Saint Luke’s Cancer Institute, L.L.C., Saint Luke’s Health System, Inc., Saint Luke’s Hospital of Kansas City, Saint Luke’s Northland Hospital—Barry Road Campus, Truman Medical Center, St. Joseph Medical Center, Lee's Summit Medical Center; Liberty Hospital; Research

Belton Hospital; Saint Luke's East - Lee's Summit; Saint Luke's Northland Hospital - Smithville Campus and St. Mary's Medical Center

- AmMO—Union Electric Company d/b/a Ameren Missouri
- Dogwood—Dogwood Energy, LLC
- Unions—IBEW Local Unions 1464, 1613 and 412
- Lee's Summit—City of Lee's Summit, Missouri
- St. Joseph—City of St. Joseph, Missouri

In its *Order* in which it set the procedural schedule in this case, as requested by the parties, the Commission scheduled evidentiary hearings in this case for January 18 to February 4, 2011, for hearing issues exclusive to KCPL and issues common to KPCL and GMO, and February 14-18, 2011 for hearing issues exclusive to GMO. Following is an order of issues, witnesses (by party) and cross-examination for those hearings which includes starting with the Cost of Capital issues (Issue Nos. 57-59 and 81) on Thursday, January 20, 2011, and then the Iatan Project issues (Issue Nos. 21-54) starting on Monday, January 24, 2011. Staff has inserted those issues in the sequence of issues where it anticipates they are likely to fall, but that placement is not controlling, the aforesaid dates are.

ORDER OF ISSUES, WITNESSES (BY PARTY) AND CROSS-EXAMINATION

Following are known witness conflict dates:

MGE witness John Reed is available January 31, February 1, 3 or 4 and February 14th or 15th.

Industrials witness Mr. Gorman is not be available the first day of the hearing (January 18).

KCPL/GMO witness Hadaway is not available on January 18th or 19th.

Tuesday, January 18 to Friday, February 4, 2011 hearings, starting at 8:30 a.m.

KCPL, and KCPL and GMO common issues

**Make Entries of Appearance Take Up Outstanding Matters
General Opening Statements, with issue-specific openings at the start of each listed issue**

KCPL & GMO
Staff
Public Counsel
KCPL Industrials
GMO Industrials
DOE/NNSA
Hospitals
MDNR
AARP/CCM
MRA
Dogwood
Kansas City
Jackson County
Robert Wagner
MJMEUC
Empire
MGE
AmMO
Unions
Lee's Summit
St. Joseph

Overview and Policy

Blanc (KCPL/GMO)
Featherstone (Staff)

Cash Working Capital Issues

(Gross Receipts Taxes—Issue No. 4, and Injuries & Damages—Issue No. 5)
Hardesty (KCPL)
Weisensee (KCPL)
Lyons (Staff)
Meyer (KCPL Industrials)

Income Tax Issues

**(Advanced Coal Income Tax Credit—Issue No. 65, Excess Deferred Income Taxes
associated with Depreciation—Issue No. 66, Kansas City Earnings Tax—Issue No. 67,
and Impact of Regulatory Additional Amortizations—Issue No. 20)**
Hardesty (KCPL/GMO)
Weisensee (KCPL)
Harrison (Staff)

Bad Debt

(Issue No. 56)
Weisensee (KCPL/GMO)

McMellen (Staff)

Purchased Power Prices

(Spot Market Prices—Issue No. 60.g.)

Crawford (KCPL/GMO)

Maloney (Staff)

Cost of Capital Starting Thursday January 20, 2011

(Return on Common Equity, Capital Structure, Equity Units and Cost of Debt, Issue Nos. 57, 58, 59 and 81)

Blanc (KCPL/GMO)

Cline (KCPL/GMO)

Hadaway (KCPL/GMO) (Unavailable January 18 and 19)

Gorman (KCPL Industrials, GMO Industrials, DOE) (Unavailable January 18)

Murray (Staff)

Brossier (Staff)

Kremer (Staff)

Off-System Sales Margins Issues

(Components, levels and tracker—Issues Nos. 60.a-f.)

Crawford (KCPL/GMO)

Harris (Staff)

Meyer (Industrials)

Jurisdictional Allocation of OSS Margins

(Allocation of Off-System Sales Margins—Issue No. 11)

Loos (KCPL)

Featherstone (Staff)

Bax (Staff)

Property Taxes

(Property tax—Issue No. 68.a. & 68.b.)

Hardesty (KCPL/GMO)

Harrison (Staff)

Lyons (Staff)

Non-labor production maintenance expense

(Issue No. 9)

Hedrick (KCPL)

Lyons (Staff)

IATAN 1, IATAN 2 AND IATAN COMMON ISSUES (Issue Nos. 21 to 54) Starting Monday January 24, 2011

Downey (KCPL/GMO)

Bell (KCPL/GMO)

Davis (KCPL/GMO)

Meyer (KCPL/GMO)
Roberts (KCPL/GMO)
Archibald (KCPL/GMO)
Giles (KCPL/GMO)
Jones (KCPL/GMO)
Nielsen (KCPL/GMO)
Blanc (KCPL/GMO)
Schallenberg (Staff)
Hyneman (Staff)
Majors (Staff)
Terry Bassham (Staff)
Denise Schumaker (Staff)
Dave McDonald (Staff)
Drabinsky (MRA)

Issue from Issue List Staff filed:

53. Tracker for Iatan 2 and Iatan Common Operations and Maintenance Expenses:
(KCPL—Weisensee, Staff—Lyons, Public Counsel—Robertson)

Should the Commission authorize the use of a tracker for Iatan 2 and Iatan Common operations and maintenance expenses?

21. Should the Iatan 1 and 2 plant additions be included in rate base in this proceeding?
(Issue No. 21)

22. Has doubt regarding the prudence or reasonableness of the Iatan 1 and 2 plant additions been raised by any party in this proceeding?

23. What should be the appropriate prudence standard regarding the costs of Iatan 1 and 2 plant additions?

24. Did KCP&L prudently manage the Iatan 1 and 2 projects?

25. Is the December 2006 Control Budget Estimate the “Definitive Estimate”?

26. Should the costs of the Iatan 1 and 2 projects be measured against the Control Budget Estimate?

27. What amount of Iatan 1, 2, and Common regulatory assets and annualized amortization expense should be included in rate base in this case?

28. Has KCPL carried its burden of proving the common costs of its Iatan 1 and Iatan 2 construction projects?

29. What portion of the Common Costs of the Iatan 1 and Iatan 2 construction projects should be included in rate base in this proceeding?

List of Iatan Project Issues:

30. UNIDENTIFIED, UNEXPLAINED COST OVERRUNS: (Staff - Hyneman)

- a. Has KCPL identified and explained cost overruns above the definitive estimate, as required by The Experimental Alternative Regulatory Plan Stipulation and Agreement, page 28, Case No. EO-2005-0329, sufficiently to show the cost overruns were prudently incurred?
- b. Should these unidentified, unexplained cost overruns in the Iatan project costs be included in rate base?

31. IATAN 1 AQCS INDIRECT COSTS RELATED TO COMMON PLANT: (Staff—Schallenberg)

Should KCPL include the Iatan Unit 1 indirect costs fully in the cost of Iatan Unit 1 or allocate a portion of those costs to Iatan Common?

32. INAPPROPRIATE CHARGES: (Staff—Hyneman)

Has KCPL included inappropriate charges in the Iatan Unit 1 and Iatan Unit 2 plant costs?

33. MAY 23, 2008 CRANE ACCIDENT IATAN 1: (Staff—Hyneman)

Should costs related to the May 23, 2008 Crane Accident be included as costs of Iatan Unit 1?

34. PROJECT DEVELOPMENT COSTS: (Staff—Hyneman)

Should Project Development Costs related to Iatan Unit 2 be included as costs of Iatan Unit 1 or Iatan Unit 2?

35. SEVERANCE ADJUSTMENT: (Staff—Hyneman)

Should employee severance costs be included in the costs of Iatan Unit 1 and Iatan Unit 2?

36. CAMPUS RELOCATION FOR UNIT 2 TURBINE BUILDING: (Staff—Hyneman)

Should the costs related to the campus relocation be included in the costs of Iatan Unit 1 and Iatan Unit 2?

37. AUGUST 25, 2007 JLG ACCIDENT: (Staff—Hyneman)

Should costs related to the August 25, 2007 JLG accident be included in the costs of Iatan Unit 1 and Iatan Unit 2?

38. CONSTRUCTION RESURFACING PROJECT: (Staff—Hyneman)

Should KCPL include costs related to the construction resurfacing project in the costs of Iatan Unit 1 and Iatan Unit 2?

39. EMPLOYEE MILEAGE CHARGES: (Staff—Hyneman)

Has KCPL included inappropriate employee mileage charges in the costs of Iatan Unit 1?

40. AFFILIATE TRANSACTION - GREAT PLAINS POWER: (Staff—Hyneman)

Should costs originally incurred by a non-regulated affiliated entity be included in the costs of Iatan Unit 2?

41. KCPL'S JULY 18, 2008 ALSTOM SETTLEMENT IATAN 1: (Staff—Hyneman)

Should the cost of the July 18, 2008 settlement and foregone liquidated damages be included in the costs of Iatan Unit 1?

42. KCPL'S IATAN 2 ALSTOM SETTLEMENT: (Staff—Hyneman)

Should the cost of the January 13, 2010 settlement be included in the costs of Iatan Unit 2?

43. SCHIFF HARDIN, LLP: (Staff—Hyneman)

SCHIFF ADJUSTMENTS

Should the following adjustments be made before the costs of services provided by Schiff Hardin for the Iatan Project be included in the costs of Iatan Unit 1 and Iatan Unit 2?

- i. Travel and other expenses adjustment
- ii. Hourly rate adjustment for Project Management duties
- iii. Schiff Hourly rate adjustment for legal services

44. ALLOWANCE FOR FUNDS USED DURING CONSTRUCTION (AFUDC) :
(Staff—Majors)

Should the following adjustments be made to the cost of AFUDC accrued on Iatan Unit 1 and Iatan Unit 2 construction costs?

- i. Adjust additional AFUDC due to Iatan 1 Turbine Start-Up Failure
- ii. Adjust additional AFUDC Caused By GPE Acquisition of Aquila

- iii. Adjust the Equity Rate Used in Calculating AFUDC
- iv. Adjust additional AFUDC due Transfer of Iatan 1 Common Plant
- v. Adjust SECTION 48A ADVANCED COAL PROJECT TAX CREDIT AFUDC
- vi. Adjust AFUDC Accrued on Staff's Prudency Adjustments

45. EXCESS PROPERTY TAXES TRANSFERRED FROM IATAN 1 TO IATAN COMMON : (Staff—Majors)

Should excess property taxes paid on Iatan Unit 1 that was transferred to Iatan Common be included in the costs of Iatan Unit 1?

46. CUSHMAN & ASSOCIATES: (Staff—Hyneman)

Should the full amount of the Cushman & Associates charges be included in the costs of Iatan Unit 1 and Iatan Unit 2?

47. PERMANENT AUXILIARY ELECTRIC BOILERS : (Staff—Schallenberg)

Is the cost of the permanent auxiliary electric boilers an Iatan Unit 1 cost or an Iatan Common Cost?

48. IATAN CHIMNEY PULLMAN ADJUSTMENT: (Staff—Hyneman)

Should KCPL include the full amount of costs paid to Pullman for the Iatan Chimney?

49. ADJUSTMENTS FROM KCC STAFF IATAN 1 AUDIT: (Staff—Hyneman)

Should the cost of Iatan Unit 1 and Iatan Unit 2 be reduced by the adjustments proposed by the KCC Staff?

50. ALSTOM WELDING SERVICES INCORPORATED (WSI) CHANGE ORDER ADJUSTMENT : (Staff—Hyneman)

Should the cost of Iatan Unit 2 be reduced by costs paid to Welding Services Incorporated?

51. TEMPORARY AUXILLARY BOILER: (Staff—Hyneman)

Should the cost of Iatan Unit 2 be reduced by the cost of the temporary auxiliary boilers?

52. Iatan Common Costs: (Staff—Schallenberg)

- a. Has KCPL carried its burden of proving the common costs of its Iatan 1 and Iatan 2 construction projects?

- b. What portion of the Common Costs of the Iatan 1 and Iatan 2 construction projects should be included in KCPL's rate base in this proceeding?

Other Iatan Issues:

54. Iatan 2 Generating Unit In-Service: (MRA—Drabinsky, Staff—Schallenberg, Hyneman, Majors)

- a. What criteria should the Commission use to determine when the Iatan 2 Generating Unit Rate Base Additions are “fully operational and used for service?”
- b. Is the Iatan 2 Generating Unit Rate Base Additions fully operational and used for service?
- c. How should Iatan 2 test energy and emission credits during the testing of Iatan 2 be

Non-Iatan Issues

Rate Case Expense

(Issue No. 70)

Weisensee (KCPL/GMO)

Blanc (KCPL/GMO)

Majors (Staff)

Depreciation/Regulatory Plan Additional Amortizations

(Issue Nos. 6, 19, 77.b. and 82)

Spanos (KCPL/GMO)

Weisensee (KCPL/GMO)

Rice (Staff)

Featherstone (Staff)

Robertson (Public Counsel)

Meyer (Industrials)

Demand-Side Management Issues

(Issue Nos. 1, 10, 79 and 83)

Rush (KCPL/GMO)

Weisensee (KCPL/GMO)

Blanc (KCPL)

Bickford (MDNR)

Hyneman (Staff)

Rogers (Staff)

Prenger (Staff)

Class Cost of Service and Rate Design Issues

(Issues Nos. 12, 13, 14, 15, 16, 17, 18, 55, 73, 74, 75, and 76)

Rush (KCPL/GMO)

Normand (KCPL/GMO)
Goble (KCPL/GMO)
Herdegen (KCPL/GMO)
Brubaker (KCPL Industrials, GMO Industrials)
Meisenheimer (Public Counsel)
Goins (DOE)
Reed (MGE) (Available January 31 and February 1, 3, 4, 14 & 15)
Noack (MGE)
Robert Wagner
Scheperle (Staff)
Kang (Staff)
Rogers (Staff)

Hawthorn 5 Issues

(SCR Warranty—Issue No. 7, and Transformer Settlement—Issue No. 8)

Blanc (KCPL)
Lyons (Staff)
Featherstone (Staff)

Acquisition Transition Costs

(Issue No. 69)

Ives (KCPL/GMO)
Majors (Staff)
Robertson (Public Counsel)

SERP, Talent Assessment and Non-Talent Assessment Severance Costs

(Issue Nos. 62, 63 and 64)

Fairchild (KCPL/GMO)
Alberts (KCPL/GMO)
Hyneman (Staff)

Low Income Program (Economic Relief Pilot Program)

(Issue No. 2)

Rush (KCPL)
Weisensee (KCPL)
Fred (Staff)
Prenger (Staff)

Low-Income Weatherization Program

(Issue No. 72)

Rush (KCPL/GMO)
Warren (Staff)
Bickford (MDNR)

Transmission Expense and Revenue Tracker

(Issue No. 71)

Rush (KCPL/GMO)

Beck (Staff)
Robertson (Public Counsel)

SO₂ Emission Allowance Regulatory Liability

(Issue No. 3)

Weisensee (KCPL)
Robertson (Public Counsel)

Proposition C issues

(Issue No. 61)

?(KCPL/GMO)
Taylor (Staff)

Monday, February 14 to Friday, February 18, 2011 hearings, starting at 8:30 a.m.

GMO only issues

Allocation of Iatan 2 and Iatan Common Plant Costs to MPS and L&P

(Issue No. 77.a.)

Rush (GMO)
Staff (Mantle)

Jeffrey Energy Center Issues

(Issue No. 84)

Hedrick (GMO)
Majors (Staff)

Fuel Adjustment Clause Issues

(Issue Nos. 90, 91, 92, 93, 94, 95, 96 and 97)

Rush (GMO)
Rogers (Staff)

Accounts Receivables Sales Program

(Issue No. 80)

Cline (GMO)
Prenger (Staff)

Prudence of MPS Generating Capacity Additions

(Issue No. 78.)

Crawford (GMO)
Blunk (GMO)
Rollison (GMO)
Mantle (Staff)
Hyneman (Staff)
Featherstone (Staff)

**Class Cost of Service and Rate Design Issues
(Issues Nos. 85, 86, 87, 88 and 89)**

**Rush (GMO)
Normand (GMO)
Brubaker (GMO Industrials)
Meisenheimer (Public Counsel)
Noack (MGE)
Park (Lee's Summit)
Scheperle (Staff)**

ORDER OF CROSS-EXAMINATION

While for specific issues a different order of cross-examination may be more appropriate, generally, the order of cross-examination, based on adversity, is the following:

KCPL witnesses

GMO, AmMO, MGE, Empire, Hospitals, Unions, MJMEUC, Robert Wagner, Jackson County, Kansas City, Dogwood, MDNR, MRA, AARP/CCM, DOE/NNSA, GMO Industrials, KCPL Industrials, Public Counsel, Staff

GMO witnesses

AmMO, MGE, Empire, Hospitals, Unions, MJMEUC, Robert Wagner, Jackson County, Kansas City, Public Counsel, Dogwood, MDNR, MRA, AARP/CCM, DOE/NNSA, Lee's Summit, St. Joseph, GMO Industrials, KCPL Industrials, KCPL

Staff witnesses

AmMO, MGE, Empire, Hospitals, Unions, MJMEUC, Robert Wagner, Jackson County, Kansas City, Public Counsel, Dogwood, MDNR, MRA, AARP/CCM, DOE/NNSA, Lee's Summit, St. Joseph, GMO Industrials, KCPL Industrials, GMO, KCPL

Public Counsel witnesses

AmMO, MGE, Empire, Hospitals, Unions, MJMEUC, Robert Wagner, Jackson County, Kansas City, Staff, Dogwood, MDNR, MRA, AARP/CCM, DOE/NNSA, Lee's Summit, St. Joseph, GMO Industrials, KCPL Industrials, GMO, KCPL

MDNR witness

AmMO, MGE, KCPL, GMO, Empire, Hospitals, Unions, MJMEUC, Robert Wagner, Jackson County, Kansas City, Dogwood, MRA, AARP/CCM, DOE/NNSA, Lee's Summit, St. Joseph, Public Counsel GMO Industrials, KCPL Industrials, Staff

DOE/NNSA witnesses

AmMO, MGE, Empire, Hospitals, Unions, MJMEUC, Jackson County, Kansas City, GMO Industrials, KCPL Industrials, GMO, KCPL, Robert Wagner, Dogwood, MDNR, MRA, AARP/CCM, Lee's Summit, St. Joseph, Staff, Public Counsel

KCPL Industrials & GMO Industrials witnesses

AmMO, MGE, Empire, Hospitals, Unions, MJMEUC, Jackson County, Kansas City, DOE/NNSA, GMO, KCPL, Robert Wagner, Dogwood, MDNR, MRA, AARP/CCM, Lee's Summit, St. Joseph, Staff, Public Counsel

MRA witnesses

AmMO, MGE, Empire, Hospitals, Unions, MJMEUC, Robert Wagner, Jackson County, Kansas City, Public Counsel, Dogwood, MDNR, Staff, AARP/CCM, DOE/NNSA, Lee's Summit, St. Joseph, GMO Industrials, KCPL Industrials, GMO, KCPL

Dogwood witness

AmMO, MGE, Empire, Hospitals, Unions, MJMEUC, Lee's Summit, St. Joseph, Jackson County, Kansas City, DOE/NNSA, GMO, KCPL, Robert Wagner, MDNR, MRA, AARP/CCM, GMO Industrials, KCPL Industrials, Staff, Public Counsel

Lee's Summit witness

AmMO, MGE, Empire, Hospitals, Unions, MJMEUC, Dogwood, St. Joseph, Jackson County, Kansas City, DOE/NNSA, GMO, KCPL, Robert Wagner, MDNR, MRA, AARP/CCM, GMO Industrials, KCPL Industrials, Staff, Public Counsel

MGE witnesses

AmMO, Empire, Hospitals, Unions, MJMEUC, Jackson County, Kansas City, DOE/NNSA, GMO, KCPL, Robert Wagner, Dogwood, MDNR, MRA, GMO Industrials, KCPL Industrials, AARP/CCM, Lee's Summit, St. Joseph, Staff, Public Counsel

Robert Wagner witness

AmMO, Empire, Hospitals, Unions, MJMEUC, Jackson County, Kansas City, DOE/NNSA, GMO, KCPL, MGE, Dogwood, MDNR, MRA, GMO Industrials, KCPL Industrials, AARP/CCM, Lee's Summit, St. Joseph, Staff, Public Counsel

WHEREFORE, the Staff submits the foregoing hearing schedule order of issues, witnesses (by party) and cross-examination order of witnesses and order of cross-examination, and, given the disagreement of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company to this hearing schedule, requests the Commission to call a prehearing conference immediately to resolve the order in which issues will be heard starting next Tuesday, January 18, 2011.

Respectfully submitted,

/s/ Nathan Williams

Nathan Williams
Deputy General Counsel
Missouri Bar No. 35512

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or emailed to all counsel of record this 11th day of January 2011.

/s/ Nathan Williams