

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

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

Case No. ER-2006-0314

**STAFF’S MOTION FOR LEAVE TO LATE-FILE NONUNANIMOUS
STIPULATION AND AGREEMENT REGARDING CAPITALIZATION OF
CERTAIN COSTS, DECOMMISSIONING EXPENSE ACCRUAL, AND
CORPORATE PROJECTS AND STRATEGIC INITIATIVES**

Comes now the Staff of the Missouri Public Service Commission (“Staff”) and for its motion for leave to late-file the attached Nonunanimous Stipulation And Agreement Regarding Capitalization Of Certain Costs, Decommissioning Expense Accrual, And Corporate Projects And Strategic Initiatives between the Staff and Kansas City Power & Light Company (“KCPL”) states:

1. Over an extended period of time during this case, KCPL and Staff personnel have been discussing appropriate language to bring before the Commission regarding several items for which KCPL would like the Commission to issue specific language in its Report And Order in this case—(a) language regarding capitalization of certain costs associated with the development and implementation of the capital investments associated with KCPL’s Regulatory Plan, as approved by the Commission in Case No. EO-2005-0329, including costs associated with the construction of the Iatan 2 project; (b) language relating to the decrease in accrual and recovery in rates of decommissioning costs of the Wolf Creek nuclear generating station due to KCPL seeking to extend the life of Wolf Creek from 40 years to 60 years, as part of the agreement

comprising the KCPL Regulatory Plan, and (c) language concerning the deferral and amortization of certain costs relating to KCPL's Corporate Projects and Strategic Initiatives.

2. These matters are explained in more detail in the Nonunanimous Stipulation And Agreement Regarding Capitalization Of Certain Costs, Decommissioning Expense Accrual, And Corporate Projects And Strategic Initiatives being filed along with this pleading.

3. On November 29, 2006, the Commission entered its Order Directing Filing in which it ordered the Staff to file by noon of December 4, 2006, certain announced agreements and stipulations on "all other settled issues," or a status report of when they would be filed.

4. Despite the thunder snowstorm the night of November 30, 2006, and the emergency conditions in Missouri December 1, 2006, the Staff and KCPL diligently worked to finalize language to present to the Commission regarding the foregoing matters and to afford the other parties an opportunity to see KCPL's and the Staff's agreement *before* submitting it to the Commission. KCPL and the Staff were able to finalize language in a stipulation and agreement on Monday afternoon, December 4, 2006, and only then was the stipulation and agreement circulated to the other parties. Undersigned counsel apologizes to the Commission and the parties for the delay in said filing occurring on Tuesday, October 5, 2006.

WHEREFORE, the Staff moves the Commission for leave to late-file in this case the Nonunanimous Stipulation And Agreement Regarding Capitalization Of Certain Costs, Decommissioning Expense Accrual, And Corporate Projects And Strategic Initiatives.

Respectfully submitted,

/s/ Steven Dottheim

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ATTORNEY FOR
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 5th day of December 2006.

/s/ Steven Dottheim