

**BEFORE THE PUBLIC SERVICE COMMISSION
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) Case No. ER-2006-0314
the Implementation of its Regulatory Plan.)

**STAFF’S MOTION FOR LEAVE TO FILE SUPPLEMENTAL
SURREBUTTAL TESTIMONY OF STAFF WITNESS JAMES A. BUSCH**

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

1. On Friday, October 6, 2006, the Staff prefiled surrebuttal testimony of its witnesses, including the surrebuttal testimony of Staff witnesses James A. Busch and Janice Pyatte.

2. In his prefiled direct testimony, Staff witness James A. Busch included as Schedule JAB-2, a table that showed the results of applying the Staff’s recommendation on overall company revenue neutral shifts in revenue responsibilities among classes to the results of the Staff’s class cost of service study prefiled with the direct testimony of Staff witness Janice Pyatte.

3. In surrebuttal testimony prefiled Friday, October 6, 2006, Staff witness Janice Pyatte explained changes to cost of service study the Staff prefiled with her direct testimony and presented new class cost of service study results.

4. No staff witness presented the results of applying the Staff’s recommendation on overall company revenue neutral shifts in revenue responsibilities among classes to the results of

the Staff's class cost of service study prefiled with the surrebuttal testimony of Staff witness Janice Pyatte.

5. The sole purpose of the supplemental surrebuttal testimony of James A. Busch submitted herewith is to present revised Schedule JAB-2 which shows the results of applying the Staff's recommendation on overall company revenue neutral shifts in revenue responsibilities among classes to the results of the Staff's class cost of service study prefiled with the surrebuttal testimony of Staff witness Janice Pyatte.

6. No party will be prejudiced by grant of this motion.

WHEREFORE, the Staff respectfully requests that the Commission issue an Order accepting the supplemental surrebuttal testimony of Staff witness James A. Busch filed October 12, 2006.

Respectfully submitted,

/s/ Nathan Williams

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronically mailed to all counsel of record this 12th day of October 2006.

/s/ Nathan Williams