

**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)	Case No. ER-2007-0291
Service to Implement its Regulatory Plan)	

STAFF’S DIRECT CCOS AND RATE DESIGN CASE

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and prefiles the class cost-of-service and rate design portion of its direct case in this proceeding. With this filing the Staff continues the Staff’s new approach of presenting its direct case in a report format that the Staff began when it filed its initial cost of service revenue requirement review and analysis of Kansas City Power & Light Company in this case on July 24, 2007. In its pleading titled, “Staff’s Direct Case” the Staff filed on July 24, 2007, the Staff provided its explanation for why the Staff has begun using a report format. That document applies to this filing also.

WHEREFORE, the Staff submits for pre-filing as part of its direct case, the Staff’s Class Cost-of-Service and Rate Design Report and the testimony, in written question and answer format, of Staff witness James C. Watkins.

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, transmitted by facsimile or electronically mailed to all counsel of record this 7th day of August 2007.

/s/ Nathan Williams
