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PROFESSIONAL CORPORATION

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July 19, 2000

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65101

**FILED<sup>2</sup>**  
JUL 19 2000  
Missouri Public  
Service Commission

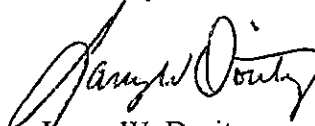
Re: *Case No. EM-2000-753*

Dear Mr. Roberts:

Please find enclosed for filing in the above-referenced matter an original and eight (8) copies of "Joint Motion to Establish Procedural Schedule." This pleading is filed on behalf of Kansas City Power & Light Company, the Staff of the Missouri Public Service Commission and the Office of the Public Counsel.

A copy of the foregoing Joint Motion has been hand-delivered or mailed this date to parties of record. Thank you for your attention to this matter.

Sincerely,

  
Larry W. DORITY

Enclosures:

cc: Dana K. Joyce, General Counsel  
Office of the Public Counsel  
Parties of record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

**FILED<sup>2</sup>**

JUL 19 2000

Missouri Public  
Service Commission

In the Matter of the Application of Kansas City )  
Power & Light Company for an Order Authorizing )  
The Transfer of Certain Electric Generation Assets )  
Used to Provide Electric Service to Customers )  
in Missouri and Other Relief Associated with )  
Kansas City Power & Light Company's Plan to )  
Restructure Itself into a Holding Company, )  
Competitive Generation Company, Regulated )  
Utility Company, and Unregulated Subsidiary. )

Case No. EM-2000-753

**JOINT MOTION TO ESTABLISH PROCEDURAL SCHEDULE**

COME NOW Kansas City Power & Light Company ("KCPL"), the Staff of the Missouri Public Service Commission ("Staff") and the Office of the Public Counsel ("Public Counsel") (collectively "Joint Movants"), by and through their counsel, and pursuant to 4 CSR 240-2.080 and the "Notice Regarding Submission of Procedural Schedule" entered in this matter on June 28, 2000, respectfully submit their Joint Motion To Establish Procedural Schedule ("Motion"). In support of their Motion, Joint Movants state as follows:

1. In its "Order Denying Motion to Reject Application as Deficient and Scheduling Early Prehearing Conference" issued in this matter on June 8, 2000, the Missouri Public Service Commission ("Commission") ordered, *inter alia*, that an Early Prehearing Conference ("Prehearing") be held on June 28, 2000, and that the parties should file a proposed procedural schedule no later than July 7, 2000, including dates for the filing of testimony and for a hearing.
2. The Joint Movants and certain intervenors participated in the Prehearing, and the Commission took up a motion by KCPL to extend the date for filing a proposed procedural schedule until July 19, 2000. No objection to that motion was raised and the motion was granted.
3. As noted in previous pleadings and one of the Commission's orders entered in this matter, KCPL is proposing a unique "cooperative, collaborative and phased approach" for this

proceeding. The Joint Movants and certain intervenors have discussed the proposed procedures and schedule for addressing the complex and inter-related issues that may be raised by KCPL's Application, including the filing of KCPL's testimony in phases, complemented by the utilization of workshops and technical conferences (informal meetings) to be conducted during each phase. The informal meetings will be held in Kansas City, likely with the Kansas Corporation Commission Staff, the Kansas Citizens Utility Ratepayers Board (CURB) and intervenors in KCPL's almost identical proposal before the Kansas Corporation Commission.

4. The Joint Movants respectfully submit the following procedural schedule for the Commission's consideration and approval:

<u>Event</u>	<u>Date</u>
KCPL Files Organizational Testimony	September 14, 2000
Informal Meeting Dates	October 6, 27, & November 17, 2000
KCPL Files Accounting Testimony	December 14, 2000
Informal Meeting Dates	January 12, February 2, 23, March 9, 2001
KCPL Files Financial Testimony	March 15, 2001
Informal Meeting Dates	April 6, 27, May 18, June 8, 22, 2001
KCPL Files Retail Testimony	July 3, 2001
Informal Meeting Dates	July 20, August 10, 31, September 14, 2001
KCPL Files Supplemental Direct Testimony	September 20, 2001
Other Parties File Rebuttal Testimony	January 31, 2002
Pre-hearing Conference	February 11, 2002
All Cross/Surrebuttal Testimony	March 28, 2002
Final Issues List	April 18, 2002
Statement of Positions	April 25, 2002
Hearing	May 20-24, 28-30, 2002

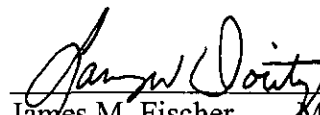
5. As signatories to the Stipulation and Agreement that was approved by the Commission in Case No. ER-99-313, In the Matter of the Stipulation and Agreement Reducing the Annual Missouri Retail Electric Revenues of Kansas City Power & Light Company (April 13, 1999), the Joint Movants are cognizant of the prohibitions or "moratorium" on filings (or encouragement or assistance in filings) that would request a general increase or decrease in KCPL's Missouri retail electric rates, or rate credits or rate refunds respecting KCPL's Missouri retail electric rates, as fully set forth in the Stipulation and Agreement in that case. By agreeing to, and proposing, the Procedural Schedule as set forth above, Joint Movants are not waiving any argument regarding the applicability of the provisions of the moratorium to the procedural events contemplated.

6. The Joint Movants recognize that it may be necessary for parties to propose revisions to the Procedural Schedule recommended herein, due to the complexity of, and uncertainty regarding, the issues, the filings ultimately made by KCPL and unforeseen events and developments that may occur during the extended length of the schedule of proceedings.

7. During discussions held following the Early Prehearing Conference, no party has expressed opposition to the Procedural Schedule as proposed herein.

WHEREFORE, Joint Movants request that the Commission adopt the above-proposed procedural schedule.

Respectfully submitted,



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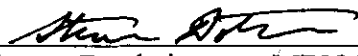
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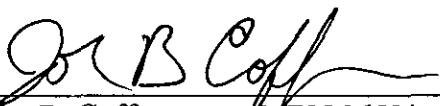
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## CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed by U.S. Mail, First Class postage prepaid, this 19<sup>th</sup> day of July 2000, to:

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