## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the Matter of the Application of Kansas City	)	
Power & Light Company to Transfer Certain	)	Case No. EM-2002-1044
Assets to Great Plains Energy Services	)	
Incorporated	)	

## KANSAS CITY POWER & LIGHT COMPANY'S MOTION TO CHANGE DATE FOR THE FILING OF STAFF RECOMMENDATION

COMES NOW Kansas City Power & Light Company ("KCPL"), pursuant to 4 CSR 240-2.080, by and through its attorneys, hereby requests that the date for the filing of the Staff Recommendation in this matter be extended from October 28, 2002, until December 31, 2002. In support of this motion, KCPL states the following:

- 1. On April 24, 2002, KCPL filed an application requesting authority to transfer certain assets to Great Plains Energy Services Incorporated ("GPES"). KCPL proposes to transfer personnel to GPES, and requests authority to transfer a small amount of personal property and general office equipment, and certain enterprise-wide capitalized software costs.
- 2. On August 29, 2002, the Commission issued its Order Directing Filing Of Staff Recommendation, and directed Staff to file its recommendation concerning the application of KCPL, no later than September 27, 2002.
- 3. The Staff was prepared to file its request by September 27, 2002, but at the request of KCPL, which was not opposed by the Staff, the Commission, on September 27, 2002, extended the deadline for the filing of the Staff Recommendation until October 28, 2002.
- 4. As described in KCPL's application, the Securities and Exchange Commission ("SEC") authorized KCPL and the nonutility subsidiaries of Great Plains

Energy Incorporated to provide goods and services to each other during an interim period which expires on November 6, 2002. The SEC has been requested to extend this interim period to March 31, 2003, and it is KCPL's expectation that the SEC will grant this request. As a result, KCPL believes it will have more time to resolve issues related to the creation of GPES, both at the state and federal levels. Due to the press of other regulatory matters, KCPL has not had the opportunity to meet with Staff and Public Counsel to discuss resolution of the issues raised in Staff's draft recommendation in this proceeding. Although Staff is prepared to file its Staff Recommendation on October 28, 2002, as directed by the Commission, KCPL needs additional time to provide Staff and Public Counsel with its suggestions and comments regarding the draft Staff Recommendation which was previously provided by Staff to KCPL and Public Counsel. In order to afford KCPL with the needed time to accomplish this review, KCPL requests that the date for the filing of the Staff Recommendation be extended from October 28, 2002, until December 31, 2002.

5. Staff and Public Counsel have indicated that they are not opposed to KCPL's request. No other parties have intervened in this proceeding. Therefore, no party, including KCPL, will be prejudiced by this request.

**WHEREFORE**, for the reasons stated herein, Kansas City Power & Light Company respectfully requests that the Commission change the date for the filing of the Staff Recommendation from October 28, 2002, until December 31, 2002.

## Respectfully submitted,

/s/ James M. Fischer

James M. Fischer, MBN 27543 Fischer & Dority, P.C. 101 Madison, Suite 400

Jefferson City, Missouri 65101 Telephone: (573) 636-6758 Facsimile: (573) 636-0383 E-mail: jfischerpc@aol.com

ATTORNEYS FOR KANSAS CITY POWER & LIGHT COMPANY

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was mailed, via U. S. Mail, postage prepaid, emailed or hand-delivered to the following counsel of record on this 25th day of October, 2001:

Dana Joyce General Counsel Steve Dottheim Chief Deputy General Counsel Missouri Public Service Commission P. O. Box 360 Jefferson City, Missouri 65102

John Coffman
Deputy Public Counsel
Office of the Public Counsel
P. O. Box 7800
Jefferson City, Missouri 65102-0250

/s/ James M. Fischer
James M. Fischer