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 Service to Implement its Regulatory Plan.))))	<u>File No. ER-2010-0355</u> Tariff No JE-2010-0692
In the Matter of the Application of KCP&L Greater Missouri Operations Company for Approval to Make Certain Changes in its Charges for Electric Service.))	<u>File No. ER-2010-0356</u> Tariff No. JE-2010-0693

RESPONSE TO ORDER DIRECTING FILING

On January 12, 2011, the Commission directed Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO") (collectively the "Company") to identify under which issues it suggests certain topics (issues 43-52, 68, 82-83) identified by Staff appear. In response to that Order, the Company states the following:

1. In the Order of Witnesses, the Iatan 1, Iatan 2 and Iatan Common Plant issues begin on January 18 after the overview and policy witnesses. Each witness appears once and takes questions regarding all of the Iatan 1, Iatan 2 and Common rate base additions, including Staff's Issues Nos. 43 through 52. The following is a list of the order of Company witnesses in the Iatan 1, Iatan 2 and Common rate base additions portion of the hearing:

Blanc

Davis

Bell

Jones

Giles

Downey

Roberts

Nielsen

Archibald

Meyer

Henderson (adverse witness called by the Company)

Weisensee

Drabinski

Elliott

Majors

Hyneman

Schallenberg

Bassham (adverse witness subpoenaed by Staff)¹

Schumaker (adverse witness subpoenaed by Staff)

McDonald (adverse witness subpoenaed by Staff)

- 2. Issue 68 from the Staff's List of Issues deals with property tax expense. The Company believes that this is not an issue in the case as it has accepted Staff's position.
- 3. Staff Issues 82 should be heard during the depreciation portion of the hearing which is currently scheduled for February 4. The Company notes that the date is subject to change due to witness Spanos availability. Staff Issue 83, should be tried on January 28 under advertising expense.
- 4. For the Crossroads issue (Staff Issue 78 listed on February 15), there is one additional GMO witness, Rollison. Staff witness Schallenberg and Majors should be removed from this issue. For the Fuel Adjustment Clause issue (Staff Issues 90, 91, 92, 93, 94, 95, 96, and 97), on February 16, 2011, there is one additional GMO witness, Rygh. For the depreciation issue there is one additional GMO witness, Klote (KCP&L Issue 8d).

¹ The Company intends to file a Motion to Quash the Bassham, Schumaker and McDonald subpoenas issued by Staff.

- 5. Regarding the depreciation issue (8) on the Company's List of Issues, Issue "g" is a separate non-depreciation issue (Staff Issue 72) and is scheduled for February 1.
- 6. The bad debt issue on January 26 should be listed as "Bad Debt/Forfeited Discounts." Also, on January 26 Maloney should be added to the list of Staff witnesses under Fuel & Purchased Power Expense.
- 7. The O&M Tracker issue listed on January 28 should be listed as, "Iatan 2 and Common Tracker".
- 8. Staff witness Rogers should be added to the witnesses for the KCP&L Rate Design/Class Cost of Service issue listed on January 31.
- 9. KCP&L/GMO witness Blanc should be added to the Rate Case Expense issue listed on February 2.
- 10. KCP&L witness Weisensee should be added to the Production Maintenance issue listed on February 2.
- 11. Staff witness Kang should be added to the Wagner Issues listed on February 3.
- 12. GMO witness Crawford should be added to the Iatan Allocation to L&P and MPS issue. Staff witness Rice should be removed from this issue listed on February 14.
- 13. In preparing Company's January 11, 2011 List of Issues and Hearing Schedule, the Company consulted the known witness conflict dates contained in Staff's January 11 Order of Issues. The Company has been discussing schedule issues with other parties and anticipates there will be changes to the order of issues following the Iatan 1, Iatan 2 and Iatan Common Plant issue based on all parties' witness availability. The Company anticipates filing a revised schedule to reflect these discussions.

Respectfully submitted,

|s| Roger W. Steiner

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CERTIFICATE OF SERVICE

A copy of the foregoing pleading has been served this 17th day of January 2011 upon counsel of record in these proceedings.

|s| Roger W. Steiner

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