

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the 2011 Resource Plan)
Of Kansas City Power & Light Company) File No. EE-2011-0032

**FOURTH REPORT OF
KANSAS CITY POWER & LIGHT COMPANY**

COMES NOW Kansas City Power & Light Company (“KCP&L”), pursuant to the Commission’s *Order Directing Kansas City Power & Light Company To File A Fourth Report* issued in this matter on November 8, 2010 (“November 8 Order”), and respectfully submits its Fourth Report as follows:

1. On August 5, 2010, KCP&L filed its application asking the Commission to waive a provision of its Electric Utility Resource Planning (IRP) regulation to allow KCP&L to delay filing its next IRP submission from August 5, 2011, until April 1, 2012. Subsequently, on August 25, 2010, KCP&L filed a motion seeking leave to amend its application for waiver to reflect the fact that its next IRP submission is currently due on November 5, 2011, not August 5, 2011.¹ KCP&L’s motion to amend its application was unopposed and the Commission granted the motion.

2. KCP&L’s application recites that the Commission is considering a substantial revision to the Chapter 22 rules in File No. EX-2010-0254, and that Section 4 CSR 240-22.080(3) of the revised rule under consideration by the Commission would require KCP&L and KCP&L Greater Missouri Operations Company (“GMO”) to file their next IRP submission on April 1, 2012. Furthermore, KCP&L has alleged that good

¹ The Commission’s current rule regarding IRP filings would require KCP&L to file its next IRP on August 5, 2011, but that time was modified by a stipulation and agreement approved by the Commission in Case No. EO-2007-0008. Accordingly, in its amended application KCP&L also requested waiver of the specific terms of the stipulation and agreement regarding said date, as approved by the Commission’s Order Approving Stipulation and Agreement and Accepting 2006 Integrated Resource Plan issued April 12, 2007, in Case No. EO-2007-0008.

cause exists for the waiver requested herein, as it would be inefficient and unreasonable to file an IRP submission on November 5, 2011, and then be required to file again on April 1, 2012, under the proposed Chapter 22 rule. KCP&L also states that a delay in the filing date for KCP&L's next IRP will allow KCP&L and GMO time to consider (with input from interested parties) the possibility of filing a single, or streamlined IRP on April 1, 2012.

3. The Commission provided notice of KCP&L's application to each party in KCP&L's 2008 IRP case, and directed interested parties to respond to the company's application by September 7, 2010. The Commission granted Dogwood Energy's request to intervene on August 24, and on August 26, Dogwood Energy filed its consent to KCP&L's request for an extension of time to file its next IRP. On September 7, OPC, Staff and MDNR responded separately to KCP&L's request.

4. Based upon requests to defer ruling on KCP&L's application pending the scheduling of a conference among stakeholders to discuss the requested relief, on September 8, 2010, the Commission issued its Order Directing Kansas City Power & Light Company To Meet With Stakeholders And To Report The Results Of That Meeting. In accordance with the Commission's Order (and subsequent orders issued herein), the Parties met on September 27, October 4, 7, 15, 27, and November 3, 2010.

5. In its Third Report filed on November 5, 2010, KCP&L reported that positions have changed and it no longer appears that a consensus proposal for the Commission's consideration in this matter will be achieved. KCP&L requested that it be allowed time to reassess its position regarding this matter, and the Commission's November 8 Order granted KCP&L's request.

6. KCP&L continues to believe that it would be inefficient and unreasonable to file an IRP submission on November 5, 2011, and then be required to file again on April 1, 2012, under the proposed Chapter 22 rule, and that good cause exists for the waiver requested herein. In addition, KCP&L maintains that a delay in the filing date for KCP&L's next IRP will allow KCP&L and GMO time to consider the possibility of filing a single, or streamlined IRP on April 1, 2012. KCP&L notes that the proposed rule, 22.080 Filing Schedule, Filing Requirements and Stakeholder Process, (1) reflects the following statement: "...Companies submitting their triennial compliance filings on the same schedule may file them jointly."

7. KCP&L believes there is good reason to prepare a joint IRP that considers the resource needs of both KCP&L and GMO simultaneously. While many aspects of the joint filing, like the load forecasts, will be utility specific, the resource acquisition strategy will consider the relative positions of each utility, and ultimately select a strategy that addresses the needs of both. In practice, this methodology more closely aligns with the methodology employed in constructing the business plans of the Companies (KCP&L and GMO), and will give the Commission and other parties a clearer indication of what lies ahead. Filing an IRP for KCP&L and an IRP for GMO separately will result in both utilities complying with the letter of the rule, but it will not be the most efficient use of either the Companies' resources or the stakeholders' resources.

8. While KCP&L has been diligent in its efforts to reach a consensus position with the stakeholders during the last two months of meetings, precious time was expended and now time is of the essence for reaching a resolution of the relief requested herein. Should the November 5, 2011 deadline for its IRP submission remain, KCP&L

must immediately begin the complex analyses and activities related to said filing, including, but not limited to: load forecasting, supply-side alternatives screening, demand-side program screening and analysis, analysis of market and company risks, and full integrated analysis of long-term system costs. Accordingly, KCP&L respectfully requests the Commission to grant its requested relief in an expeditious manner.

WHEREFORE, Kansas City Power & Light Company respectfully submits its Fourth Report in this matter, and prays that the Commission grant its request to resolve this proceeding in an expeditious manner.

Respectfully submitted,

/s/ James M. Fischer

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**ATTORNEYS FOR KANSAS CITY
POWER & LIGHT COMPANY**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand delivered, emailed or mailed, postage prepaid, this 19th day of November, 2010, to all counsel of record.

/s/ James M. Fischer _____
James M. Fischer