BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Adam P. Zimmerman,)	
Complainant,)	
1 ,	,)	
V.) Case No. EC-2008-019) 5
)	
Kansas City Power & Light Company,)	
)	
Respondent.)	

MOTION OF KANSAS CITY POWER & LIGHT COMPANY FOR EXTENSION OF TIME TO ANSWER TO ALLOW ADDITIONAL TIME FOR SETTLEMENT DISCUSSIONS

Pursuant to 4 CSR 240-2.080, Kansas City Power & Light Company ("KCPL") hereby submits to the Missouri Public Service Commission ("Commission") KCPL's Motion for Extension of Time to Answer to Allow Additional Time for Settlement Discussions.

- 1. On December 20, 2007, the Commission issued a Notice of Complaint in the above-captioned case. Pursuant to that notice KCPL's answer to the complaint is due January 21, 2008.
- 2. KCPL believes it is possible for it and Mr. Zimmerman to negotiate a mutually beneficial settlement that would resolve all matters at issue in this proceeding. To that end, KCPL respectfully requests that the Commission postpone the due date for KCPL's answer to the Complaint to give KCPL and Mr. Zimmerman an opportunity to settle the matter.
- 3. Specifically, KCPL requests that the Commission extend the deadline to answer the complaint until the earlier of (i) February 29, 2008 or (ii) 15 days from the date on which KCPL or Mr. Zimmerman notifies the Commission in writing that settlement is not possible.

4. Although KCPL appreciates the Commission's proposal to subject the matters at

issue here to voluntary mediation, KCPL is hopeful that the issues may be resolved to the mutual

benefit of KCPL and Mr. Zimmerman without further taxing the Commission's resources.

Granting KCPL's Motion serves the public interest because it will give KCPL and

Mr. Zimmerman an opportunity to negotiate a mutually beneficial settlement without the

expense and inconvenience to both parties of litigation. Moreover, Mr. Zimmerman will not be

prejudiced by the extension. KCPL will waive any late payment or other related fees potentially

due until Mr. Zimmerman's complaint is either settled or resolved by the Commission.

For the foregoing reasons, KCPL respectfully requests that the Commission extend the

deadline to answer Mr. Zimmerman's complaint until the earlier of (i) February 29, 2008 or

(ii) 15 days from the date on which KCPL or Mr. Zimmerman notifies the Commission in

writing that settlement is not possible.

5.

Respectfully submitted,

|s| Curtis D. Blanc

Curtis D. Blanc (Mo. Bar No. 58052)

1201 Walnut, 20th Floor

Kansas City, MO 64106-2124

Telephone: (816) 556-2483 Facsimile: (816) 556-2787

E-Mail: Curtis.Blanc@kcpl.com

Counsel for Kansas City Power & Light Company

Dated: January 17, 2008

- 2 -

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing response was served via e-mail or first class mail, postage pre-paid, on this 17th day of January 2008, upon:

Kevin Thompson Missouri Public Service Commission P.O. Box 360 200 Madison St., Suite 800 Jefferson City, Missouri 65102

Colleen M. Dale Secretary and Chief Regulatory Law Judge Missouri Public Service Commission 200 Madison Street, Suite 100 P.O. Box 360 Jefferson City, Missouri 65102 Lewis Mills Office of Public Counsel P.O. Box 7800 200 Madison St., Suite 640 Jefferson City, Missouri 65102

Adam P. Zimmerman 8133 Holmes, Apt. # 303 Kansas City, Missouri 64131

|s| Curtis D. Blanc