

**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.)

Case No. ER-2009-0089

MISSOURI DEPARTMENT OF NATURAL RESOURCES' MOTION TO LATE
FILE THE LIST OF ISSUES AND ITS STATEMENT OF POSITION

COMES NOW the Missouri Department of Natural Resources (MDNR) and states as follows:

1. On April 14, 2009, MDNR filed a List of Issues, Order of Witnesses and Order of Cross-Examination in an attempt to address certain omissions in the List of Issues, Order of Witnesses and Order of Cross-Examination filed on April 13, 2009, by KCPL.
2. Unfortunately, due to the press of business and the difficulties that arose developing the List of Issues, Order of Witnesses and Order of Cross-Examination, the MDNR inadvertently failed to include one of the issues it has raised regarding one of KCPL's proposed programs, the Economic Relief Pilot Program.
3. That issue is included in the List of Issues, Order of Witnesses and Order of Cross-Examination filed in this case's companion case, ER-2009-0090.

WHEREFORE, MDNR respectfully moves the Commission to allow it to late file ifs Amended List of Issues, Order of Witnesses and Order of Cross-Examination and its Amended Statement of Positions.

Respectfully submitted,

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or emailed to all counsel of record this 16 th day of April, 2009.

/s/ Shelley A. Woods