

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

In the Matter of the Application of KCP&L Greater)
Missouri Operations Company for Authority) Case No.
to Sell Its Platte City and Liberty Service Centers.)

APPLICATION AND MOTION FOR EXPEDITED TREATMENT

COMES NOW KCP&L Greater Missouri Operations Company (“KCP&L-GMO” or “Applicant”), pursuant to 4 CSR 240-2.060, 4 CSR 240-3.110, and 4 CSR 240-2.080(16) hereby respectfully submits to the Missouri Public Service Commission (“Commission”) its Application And Motion For Expedited Treatment. In support of its request, Applicant states as follows:

I. APPLICANT

1. Applicant is a Delaware corporation with its principal office and place of business at 1201 Walnut, Kansas City, Missouri 64106-2124.¹ Applicant is primarily engaged in providing electric and steam utility service in Missouri to the public in its certificated areas. Applicant is an “electrical corporation” and a “public utility” subject to the jurisdiction, supervision and control of the Commission under Chapters 386 and 393. A Certificate of Authority for a foreign corporation to do business in the State of Missouri, evidencing the Company’s authority under the law to conduct business in the State of Missouri, was filed with the Commission in Case No. EU-2002-1053 and is incorporated herein by reference in accordance with 4 CSR 240-2.060(1)(G). KCP&L-GMO’s fictitious name registration was filed in Case No. EN-2009-0015 and is incorporated herein by reference.

¹ Applicant is the surviving corporation that resulted from the recent merger of Aquila, Inc., a Delaware corporation, and Gregory Acquisition Corp., a Delaware corporation, which was a direct, wholly-owned subsidiary of Great Plains Energy Incorporated, a Missouri corporation. This merger was approved by the Commission in its Report And Order issued on July 1, 2008 in Case No. EM-2007-0374.

2. Applicant has no pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court that involves customer service or rates, which has occurred within three years of the date of this Application. No annual report or assessment fees are overdue.

3. Pleadings, notices, orders and other correspondence and communications concerning this Application should be addressed to the undersigned counsel and:

Tim M. Rush
Director Regulatory Affairs
Kansas City Power & Light Company
1201 Walnut – 13th Floor
Kansas City, Missouri 64106
Phone: (816) 556-2344
Fax: (816) 556-2110
E-mail: Tim.Rush@kcpl.com

II. SUMMARY

4. This Application seeks a determination by the Commission regarding the pending sale of property at Applicant's Platte City Service Center ("the Platte City Service Center") located in Platte City, Missouri to the entity specified in Attachment No. 2 (HC) and the proposed sale of the Liberty Service Center ("the Liberty Service Center") to a yet-to-be determined purchaser. These sales of the Platte City Service Center and the Liberty Service Center (collectively referred to as "the Service Centers") are occasioned by the integration of KCP&L-GMO and Kansas City Power & Light Company ("KCP&L") operations as a result of the transaction that was approved by the Commission in Case No. EM-2007-0374. As the Joint Applicants in Case No. EM-2007-0374 explained to the Commission, the Service Centers are being closed as part of the consolidation of service centers owned by KCP&L and KCP&L-GMO. (Ex. No. 17, Herdegen Supp. Direct at 11, Ex. No. 31, Zabors Supp. Direct at p. 11, Ex. No. 21, Marshall Supp. Direct at 12-13, Case No. EM-2007-0374). The Applicant is requesting

the Commission to (1) determine whether the Commission's approval of the proposed sales are necessary, and if so, (2) to approve the sale of the Platte City Service Center; and (3) to approve the sale of the Liberty Service Center.

5. It is not clear to Applicant whether the sales of the Service Centers must be approved by the Commission as a transfer of "part of [the Applicant's] franchise, works or system, necessary or useful in the performance of its duties to the public. . . ." Section 393.190(1) RSMo. 2000. However, the Commission has requested in prior proceedings that utilities seek authorization prior to engaging in such transactions. Consequently, without conceding for purposes of future transactions that the Commission has jurisdiction, the Applicant respectfully requests the proposed sales of the Service Centers be approved, as requested herein.

6. Pursuant to 4 CSR 240-3.110, brief descriptions of the properties involved are contained in Attachment No. 1 which is attached hereto and incorporated herein by reference. A copy of the Real Estate Purchase & Sale Agreement dated October 3, 2008 ("the Agreement") is contained in Attachment No. 2 (**HC**) which is attached hereto and incorporated herein by reference. The Platte City Service Center has already been vacated and operations are currently being handled out of the Northland facility.

7. The proposed sales of the Service Centers are not detrimental to the public interest since the sales will result in more efficient operations for KCP&L-GMO and KCP&L. Synergy savings from this proposed sale will be passed along to customers in future rate cases involving KCP&L-GMO and KCP&L, as explained in the Joint Applicants' testimony filed in Case No. EM-2007-0374.

8. The Greater Kansas City Metropolitan Area will be managed as a single district, including both the service areas of the KCP&L-GMO and Kansas City Power & Light Company (“KCP&L”). To more efficiently serve the metropolitan area, there will be two service center consolidation efforts. In addition to improved efficiencies, these consolidations will also help foster a unified culture by including staff from both KCP&L and KCP&L-GMO. The first consolidation of service centers which is the subject of this Application will merge the existing Liberty and Platte City Service Centers into KCP&L’s Northland facility.² The Liberty and Platte City Service Centers will be sold. The consolidation effort will deliver labor efficiencies from economies of scale. These changes will continue to improve customer satisfaction, reliability, safety and cost related to the distribution of electricity in the Greater Kansas City Metropolitan Area.

9. Because of the geographical proximity of the 3 existing service centers, the combination will allow KCP&L-GMO and KCP&L to operate more efficiently, leveraging manpower and equipment. For example, Northland Service Center has a stringing rig and Liberty has a boring machine that will be deployed throughout the whole territory. The outage response will be enhanced in the northern metropolitan area by inclusion of the primary population centers into KCP&L's 24/7 coverage. Operations crews assigned to the Northland Service Center will be staffed in accordance with the policy of continual coverage. The less populated, more rural areas north of Platte City, including Weston, will be served by two resident local representatives. These employees will have trucks assigned and be dispatched from their homes for after-hours response. This will provide timely response in these areas by reducing the travel time from a central metropolitan location.

² The second consolidation will combine existing service center operations in Lee’s Summit, Blue Springs, and Dodson into a new facility to be built in or near Lee’s Summit along the I-470 corridor. The second phase of the

10. The proposed sale of the Service Centers will have no impact upon the tax revenues of the political subdivision in which the structures, facilities or equipment is located since the Service Centers are expected to be utilized as service centers, and will pay applicable taxes upon the property following the closing of the proposed transactions.

MOTION FOR EXPEDITED TREATMENT

11. Pursuant to 4 CSR 240-2.080(16), Applicant is requesting expedited treatment of this application.

12. Applicant requests approval of this request by October 31, 2008, or as soon as convenient for the Commission, to be effective but no later than November 3, 2009. There will be no negative effect on Applicant's customers or the general public if the Commission acts by the date requested herein. This pleading was filed as soon as possible following the consummation of the merger approved in Case No. EM-2007-0374, and the execution of the Agreement.

WHEREFORE, for the foregoing reasons, Applicant respectfully requests that the Commission determine whether Commission approval of the sale of the Platte City and Liberty Service Centers are necessary, and if so, approve the sale of the Platte City Service Center and

consolidation is expected to occur within the next few years.

the sale of the Liberty Service Center, as proposed herein, and that such relief be granted on an expedited basis as set forth herein.

Respectfully submitted,

/s/ Victoria Schatz

Victoria Schatz, MBN 44208
Curtis D. Blanc, MBN 58052
Kansas City Power & Light Company
1201 Walnut, 20th Floor
Kansas City, MO 64106
Telephone: (816) 556-2785
Facsimile: (816) 556-2787
email: victoria.schatz@kcpl.com
email: curtis.blanc@kcpl.com

**Attorney for
KCP&L Greater Missouri Operations 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 21st day of October, 2008, to all counsel of record.

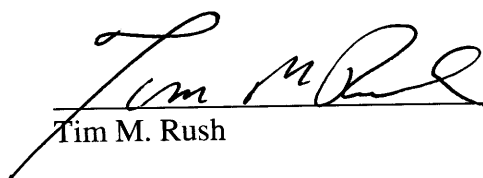
/s/ Victoria Schatz

Victoria Schatz

AFFIDAVIT

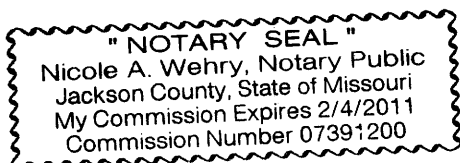
State of Missouri)
) ss
County of Jackson)

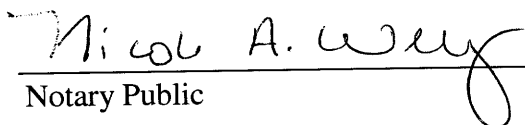
I, Tim M. Rush, having been duly sworn upon my oath, state that I am the Director, Regulatory Affairs of Kansas City Power & Light Company ("KCPL"), that I am duly authorized to make this affidavit on behalf of the Applicant, and that the matters and things stated in the foregoing pleading are true and correct to the best of my information, knowledge and belief.



Tim M. Rush

Subscribed and sworn before me this 21st day of October, 2008.





Notary Public

Attachment No. 1

Descriptions of the Properties to Be Sold

Platte City Service Center

15055 Bethel Road
Platte City, Missouri

2.5 miles from Interstate I-29
5 acres
5,000 SF office building
14,000 SF warehouse

Liberty Service Center

2250 North SR A
Liberty, Missouri

Located off of Highway 291 and Interstate I-35

8.4 acres
5 acres paved
10,000 SF office and warehouse

Attachment No. 2

Real Estate Purchase & Sale Agreement
Dated October 3, 2009