

**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)	Case No. ER-2007-0291
Certain Changes in its Charges for Electric)	Tariff No. YE-2007-0541
Service to Implement Its Regulatory Plan)	

**RESPONSE TO ORDER DIRECTING FILING
OF KANSAS CITY POWER & LIGHT COMPANY**

Pursuant to the Order Directing Filing issued by the Missouri Public Service Commission (“Commission”) in the above-captioned proceeding on October 25, 2007 and 4 CSR 240-2.080, Kansas City Power & Light Company (“KCPL” or “Company”) submits its explanation as to why it has not yet submitted a reconciliation. In addition, KCPL respectfully requests that the Commission excuse KCPL from submitting the true-up reconciliation in this case because Staff will submit it as part of its true-up direct testimony, which is due to be submitted by November 2, 2007.

1. On October 25, 2007, the Commission issued an order directing KCPL “to file a reconciliation or, in the alternative, a pleading explaining why such a reconciliation should not be required.” KCPL believes that a reconciliation should be required in this case, but believes October 21, 2007 is premature. That date arose from the Stipulation and Agreement concerning KCPL’s Regulatory Plan, which the Commission approved in Case No. EO-2005-0329. October 21 was presumably chosen to coincide with the true-up proceedings in this rate case. However, the current rate case appears to be on a slightly later track than contemplated in the Regulatory Plan Stipulation and Agreement.

2. The reconciliation, by definition, compares Staff’s and Company’s cases as of a certain date, in this case, September 30, 2007. To date, KCPL and Staff have not sufficiently evaluated and compared the impact that their different positions in the case will have on their

respective suggested revenue requirements using September 30, 2007 data and other known and measurable adjustments. Such information, which is summarized in the reconciliation, is necessary for the true-up proceedings contemplated by the Commission in its procedural order in this case.

3. KCPL and Staff are in the process of completing the reconciliation. It is KCPL's understanding that Staff witness Steve Traxler will attach the reconciliation to his true-up direct testimony, which is due to be filed in this case no later than November 2, 2007. This is consistent with typical Commission procedure in that Staff is typically the party that submits the reconciliation.

4. KCPL therefore requests that the Commission postpone the due date for the reconciliation, as set forth in the Regulatory Plan Stipulation and Agreement, until November 2, 2007. KCPL also requests leave not to submit the reconciliation because Staff will submit it as part of its true-up direct testimony. No party will be prejudiced by the timing of the submission of the reconciliation. In last year's rate case, Case No. ER-2006-0314, the true-up reconciliation was not submitted until December 1, 2006, two weeks after the true-up evidentiary hearing ended. No party suggested in that case that such timing prejudiced them.

Respectfully submitted,

/s/ Curtis D. Blanc

Curtis D. Blanc, MBN 58052
Kansas City Power & Light Company
Telephone: (816) 556-2483
Facsimile: (816) 556-2787
email: Curtis.Blanc@kcpl.com

Counsel 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 30th day of October 2007, to all counsel of record.

/s/ *Curtis D. Blanc*

Curtis D. Blanc