



Law Department

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June 20, 2013

Mr. Joshua Harden
Secretary/General Counsel
Missouri Public Service Commission
200 Madison Street
Jefferson City MO 65101

Re: *In the Matter of the Resource Plan of
KCP&L Greater Missouri Operations Company
Pursuant to 4 CSR 240-22*

Dear Mr. Harden:

Pursuant to Chapter 22 of the regulations of the Missouri Public Service Commission (“Commission”), KCP&L Greater Missouri Operations Company (“GMO”) respectfully submits with this letter information in compliance with the Commission’s Electric Utility Resource Planning (sometimes referred to as the “integrated resource plan” or “IRP”) reporting requirements.

Attached to this letter is a corporate approval and statement of commitment of the new preferred plan.

GMO respectfully requests Commission acknowledgement, under 4 CSR 22.080(17). As defined in 4 CSR 240-22.020 (1):

... Acknowledgement means that the commission finds the preferred resource plan, resource acquisition strategy, or the *specified element* of the resource acquisition strategy to be reasonable at a specific date, typically the date of the filing the utility’s Chapter 22 compliance filing or the date the acknowledgment is given.... (emphasis added)

In conducting the analysis ultimately leading to the selection of GMO’s preferred plan and KCP&L’s preferred plan, an analysis of GMO as an independent company was conducted, and an analysis of KCP&L as an independent company was conducted. Additionally, combined company (GMO and KCP&L) resource plans were developed to determine if either of the stand-alone (GMO or KCP&L) preferred plans should be adjusted under a joint company view. In this instance, neither the GMO nor the KCP&L preferred resource plan required adjusting as a result of this analysis. However, GMO and KCP&L believe this element of planning—planning that

Mr. Joshua Harden

June 20, 2013

Page 2

includes a joint company view—is an important element of resource planning for both companies. At the time of this filing, KCP&L and GMO share the unique status of being MO investor owned utilities held by one holding company, Great Plains Energy. The Chapter 22 rules governing resource planning in MO are silent as to how planning should be conducted given this unique relationship.

Consequently, GMO and KCP&L are requesting that the specified element—planning that includes a joint company view—consistent with GMO’s and KCP&L’s business planning processes, is reasonable.

The IRP contains information that has been designated “Highly Confidential” or “Proprietary” and should be treated according pursuant to 4 CSR 240-2.135.

In addition to undersigned counsel, please direct communications regarding this docket to:

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This Letter of Transmittal and the entire IRP have been provided to the Commission’s General Counsel’s office and the Office of Public Counsel.

If you have any questions or concerns, please do not hesitate to contact me.

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner

RWS/naw/IRP attachment

cc: Office of Public Counsel (w/IRP attachment)

SECTION 7: RESOURCE ACQUISITION STRATEGY

7.1 CORPORATE APPROVAL AND STATEMENT OF COMMITMENT

**KCP&L GREATER MISSOURI OPERATIONS COMPANY
INTEGRATED RESOURCE PLAN-2013 ANNUAL UPDATE
CORPORATE APPROVAL & STATEMENT OF COMMITMENT FOR
RESOURCE ACQUISITION STRATEGY**

In accordance with Missouri Public Service Commission rules found in 4 CSR 240-22 and 4 CSR 240-22-080 (3), KCP&L Greater Missouri Operations Company ("GMO") now officially adopts for implementation the resource acquisition strategy contained in this Annual Update filing.

With the objective of providing the public with energy services that are safe, reliable, and efficient at just and reasonable rates, GMO is committed to the full implementation of the Resource Acquisition Strategy contained herein.



Kevin Noblet

Vice President - Generation



Terry D. Bassham

President and Chief Operating Officer