

**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)	Case No. ER-2006-0314
for Electric Service to Begin the)	
Implementation of its Regulatory Plan)	

**MISSOURI DEPARTMENT OF NATURAL RESOURCES' REPLY POST-
HEARING BRIEF**

COMES NOW the Missouri Department of Natural Resources and submits its reply post-hearing brief. The MDNR is only replying to the Prehearing (sic) Brief filed by Intervenor W. Bill Dias.

Customer Programs:

Weatherization Program:

Initially, the MDNR notes that Mr. Dias includes Issues that were not on the List of Issues agreed to by the Parties and filed with the Commission in the above-styled case. That having been said, most of these additional "issues" raised by Mr. Dias appear to involve a contract dispute between Mr. Dias and Kansas City Power & Light, which, as noted in MDNR's Post-Hearing Brief, is not a matter for this Commission to resolve.

Should KCPL participate in an "Energy Conservation Program" that will provide consultation, weatherization materials and installation? If so, should the cost of the program to be underwritten by KCPL and charged to the customer?

The MDNR objected to the inclusion of this issue and has asserted (and continues to assert) that it is not properly before the Commission in this case.

Having said that, MDNR states that Mr. Dias' summary of the record on this issue is not supported by the evidence adduced during the hearing. (Tr. Vol. 14, pp. 1445-1446, 1544-1545, 1548-1549, 1550-1551.) The MDNR would further cite the Commission to the Post-Hearing Briefs filed on behalf of the City of Kansas City and KCPL.

Finally, MDNR must advise the Commission that, despite what is stated in Mr. Dias' certificate of service, he has not provided MDNR with a copy of his Prehearing (sic) Brief, either electronically or by mail.

WHEREFORE, the MDNR submits its reply post-hearing brief.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was mailed, postage pre-paid via US Mail, or sent electronically, on this 27th day of November, 2006, to:

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