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May 25, 2000

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Mr. Dale Hardy Roberts  
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Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

FILED<sup>3</sup>

MAY 25 2000 *mw*

Missouri Public  
Service Commission

**RE: Case No. EM-2000-753**

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of the **STAFF RESPONSE**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

*Dennis L. Frey*

Dennis L. Frey  
Assistant General Counsel  
(573) 751-8700  
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DLF/lb  
Enclosure  
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

**FILED**<sup>3</sup>  
MAY 25 2000  
Missouri Public  
Service Commission

In the Matter of the Application of Kansas )  
City Power & Light Company for an )  
Order Authorizing the Transfer of Certain )  
Electric Generating Assets Used to )  
Provide Electric Service to Customers in )  
Missouri and Other Relief Associated with )  
Kansas City Power & Light Company's )  
Plan to Restructure Itself into a Holding )  
Company, Competitive Generation )  
Company, Regulated Utility Company, )  
and Unregulated Subsidiary. )

Case No. EM-2000-753

**STAFF RESPONSE**

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission and respectfully states as follows:

1. On May 15, 2000, Kansas City Power & Light Company ("KCPL" or "Company") filed with the Commission its Application requesting authorization to restructure itself into a holding company, a competitive generation company, a regulated utility company, and an unregulated subsidiary. On that same day KCPL filed a Motion requesting that the Commission issue its standard protective order in this case, and schedule an early prehearing conference as soon as possible following the expiration of the intervention deadline.

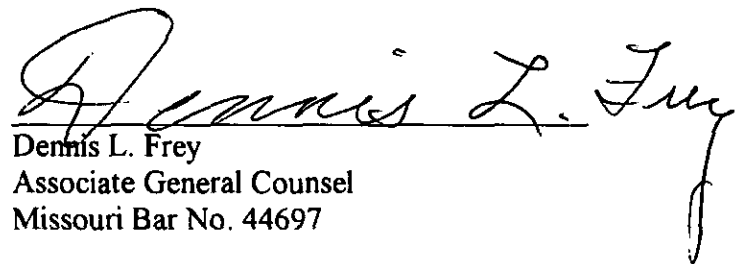
2. On May 16, 2000, the Commission issued an Order granting KCPL's request for a protective order in this case. The Commission has not yet ruled on the Company's request for an early prehearing conference. Also on May 16, the Commission issued its Order and Notice, which, *inter alia*, set June 15, 2000 as the deadline for applications to intervene in this case.

3. The Staff would note that the filing of the aforementioned Application may set in motion a process of considerable intensity and complexity. The Staff is of the opinion that the Commission should take no substantive or procedural action regarding KCPL's Application, other than the scheduling of an early prehearing conference, until after the intervention period expires and all parties have had an opportunity to respond the Company's Application.

WHEREFORE, the Staff respectfully requests that the Commission set an early prehearing conference for a time following the intervention period and require the parties to file their responses to the Company's Application within fourteen days following the early prehearing conference.

Respectfully submitted,

DANA K. JOYCE  
General Counsel



Dennis L. Frey  
Associate General Counsel  
Missouri Bar No. 44697

Attorney for the Staff of the  
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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 25th day of May 2000.

Dennis L. Frey

**Service List for**  
**Case No. EM-2000-506**  
**May 18, 2000**

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