



Edward F. Downey  
Direct: (573) 556-6622  
efdowney@bryancave.com



FILED<sup>4</sup>

AUG 28 2006

August 28, 2006

Mr. Thomas F. Simon, Clerk  
Missouri Supreme Court  
207 West High Street  
P.O. Box 150  
Jefferson City, MO 65102

Missouri Public  
Service Commission

Re: In the Matter of the Application of Kansas City Power & Light Company,  
Missouri Public Service Commission Case No. ER-2006-0314, Tariff No.  
YE-2006-0594

Dear Mr. Simon:

Enclosed are the *Petition for Leave to Appear Pro Hac Vice of Gregory K. Lawrence* and *Petition for Leave to Appear Pro Hac Vice of Grace C. Wung* in the above matter, along with the \$100.00 fee required for each attorney to appear before the stated commission. Please issue a receipt for the same. Thank you.

Very Truly Yours,

*Edward F. Downey*  
Edward F. Downey *by lea*

EFD: lea  
CC: All parties

**Bryan Cave LLP**  
Riverview Office Center  
221 Bolivar Street  
Jefferson City, MO 65101-1574  
Tel (573) 556-6620  
Fax (573) 556-6630  
www.bryancave.com

Hong Kong  
Irvine  
Jefferson City  
Kansas City  
Kuwait  
Los Angeles  
New York  
Overland Park  
Phoenix  
Riyadh  
Shanghai  
St. Louis  
United Arab Emirates  
Abu Dhabi  
Dubai  
Washington, DC

*in Association With  
Bryan Cave (Illinois)*

Chicago

*and Bryan Cave,  
A Multinational  
Partnership*

London

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>4</sup>

AUG 28 2006

Before Commissioners:

Jeff Davis, Chairman  
Connie Murray, Commissioner  
Steve Gaw, Commissioner  
Robert M. Clayton III, Commissioner  
Linward Appling, Commissioner

Missouri Public  
Service Commission

In the Matter of the Application )  
Of Kansas City Power & Light Company )  
For Approval to Make Certain Changes ) Case No. ER-2006-0314  
In Its Charges for Electric Service ) Tariff No. YE-2006-0594  
To Begin the Implementation of )  
Its Regulatory Plan )

**PETITION FOR LEAVE TO APPEAR PRO HAC VICE**  
**OF GRACE C. WUNG**

COMES NOW, Grace C. Wung, and pursuant to 4 CSR 240-2.030 submits this  
Petition for Leave to Appear Pro Hac Vice (the "Petition") to the Public Service  
Commission of the State of Missouri (the "Commission"). In support of the Petition,  
Grace C. Wung states as follows:

1. I am a member in good standing of the Court of Appeals for the District of  
Columbia, the Maryland Court of Appeals, and the Supreme Judicial Court for the State  
of Massachusetts, and hereby certify that I am not, nor is any member of McDermott Will  
and Emery LLP, disqualified from appearing in either of these courts.

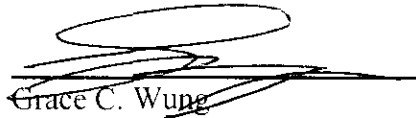
2. I hereby designate Edward F. Downey, a member in good standing of the  
Missouri Bar, as local representation.

3. Edward F. Downey hereby enters an appearance as an attorney of record.

WHEREFORE, I certify that these statements are true and correct and hereby request leave to appear *pro hac vice* in this proceeding.

Respectfully submitted,

Dated: August 28, 2006

  
Grace C. Wung

McDermott Will & Emery LLP  
28 State Street  
Boston, MA 02109-1775  
Telephone: (617) 535-4069  
Facsimile: (617) 535-3800  
Email: [gwung@mwe.com](mailto:gwung@mwe.com)

Verification

State of Missouri )  
County of Cole ) ss

Comes now the undersigned and upon oath first duly sworn states that he has read the foregoing pleading, he is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of his knowledge and belief.

Edward F. Downey  
Edward F. Downey

Subscribed and sworn to before me this 28th day of August, 2006

Linda E. Armstrong  
Notary Public

My Commission Expires:



LINDA E. ARMSTRONG  
My Commission Expires  
January 1, 2009  
Callaway County  
Commission #04452811

### Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing Petition for Leave to Appear Pro Hac Vice of Grace C. Wung was deposited in the United States Mail, first class postage prepaid, this 28th day of August, 2006, to the following:

General Counsel's Office  
P.O. Box 360  
200 Madison Street, Suite 800  
Jefferson City, MO 65102

Lewis R. Mills, Jr.  
P.O. Box 2230  
200 Madison Street, Suite 650  
Jefferson City, MO 65102

US Department of Energy NNSA  
Kansas City Plant  
Stephanie Bogart  
P.O. Box 410202  
Kansas City, MO 64111

AARP  
John Coffman  
871 Tuxedo Blvd  
St. Louis, MO 63119

Aquila, Inc.  
Diana Carter  
312 E. Capital Avenue  
P.O. Box 456  
Jefferson City, MO 65102

City of Kansas City, Missouri  
Mark Comley  
601 Monroe Street, Suite 301  
P.O. Box 537  
Jefferson City, MO 65102-0537

County of Jackson, Missouri  
Jeremiah Finnegan  
1209 Penntower Office Center  
3100 Broadway  
Kansas City, KS 66101

Empire District Electric Company  
Dean Cooper  
312 East Capital  
P.O. Box 456  
Jefferson City, MO 65102

Ford Motor Company  
Diana Vuylstek  
211 N. Broadway  
St. Louis, MO 63102

Missouri Department of Natural  
Resources  
Shelley Woods  
P.O. Box 899  
Jefferson City, MO 65102-0899

Kansas City Power & Light  
Company  
William Riggins  
1201 Walnut  
Kansas City, MO 64141

Kansas City Power & Light  
Company  
James Fischer  
101 Madison - Suite 400  
Jefferson City, MO 65101

Praxair, Inc.  
David Woodsmall  
3100 Broadway, Suite 1209  
Kansas City, MO 64111

Missouri Gas Energy  
Diana Carter  
312 E. Capital Avenue  
P.O. Box 456  
Jefferson City, MO 65102


Missouri Industrial Energy  
Consumers  
Diana Vuylsteke  
211 N. Broadway  
St. Louis, MO 63102

Trigen-Kansas City Energy  
Corporation  
Jeffrey Keevil  
4603 John Garry Drive, Suite 11  
Columbia, MO 65203

Praxair, Inc.  
Stu Conrad  
3100 Broadway  
Suite 1209  
Kansas City, MO 64111

Trigen-Kansas City Energy  
Corporation  
Charles Stewart  
4603 John Garry Drive, Suite 11  
Columbia, MO 65203

US Department of Energy NNSA  
Kansas City Plant  
Paul Phillips  
1000 Independence Ave S.W.  
Washington, DC 20585

  
Grace C. Wung



THOMAS F. SIMON  
CLERK

**CLERK OF THE SUPREME COURT**  
**STATE OF MISSOURI**  
**POST OFFICE BOX 150**  
**JEFFERSON CITY, MISSOURI**  
**65102**

TELEPHONE  
(573) 751-4144

August 28, 2006

*This will hereby acknowledge receipt of \$200 as required by Rule 6.01(m) for Gregory K. Lawrence and Grace C. Wung, appearing in the Matter of the Application of Kansas City Power & Light Company, Cause No. ER-2006-0314, before the Public Service Commission, State of Missouri.*

A handwritten signature in black ink, appearing to read "Thomas F. Simon", written over a horizontal line.

Thomas F. Simon, Clerk