

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the Application of)
Kansas City Power & Light Company) Docket No.: 15-KCPE-116 -RTS
to Make Certain Changes in)
Its Charges for Electric Service)

PETITION INITIATING DOCKET

Kansas City Power & Light Company (“KCP&L”) hereby files this petition with the State Corporation Commission of the State of Kansas (“Commission”) to open a docket and obtain a docket number assignment in advance for its rate application (“Application”) expected to be filed with the Commission on January 2, 2015.

1. KCP&L is a corporation duly organized under the laws of the State of Missouri, with its principal place of business at One Kansas City Place, 1200 Main Street, Kansas City, Missouri, 64141. KCP&L is authorized to do business and is conducting business in the State of Kansas. KCP&L is an electric public utility in Kansas and holds a certificate of convenience and necessity issued by the Kansas Commission.

2. KCP&L will be filing a full general rate case Application with the Commission on January 2, 2015. Such filing will be made pursuant to K.S.A. 66-117 and will meet the filing requirements of K.A.R. 82-1-231.

3. KCP&L hereby seeks to open a docket in advance of filing its Application so as to obtain a docket number and allow the Commission Staff and the Citizens’ Utility Ratepayers Board (“CURB”) to begin a pre-audit of the La Cygne Environmental Project prior to the filing of KCP&L’s Application.

4. This petition is being filed as KCP&L represented it would be in the *Joint Application of Kansas City Power & Light Company, Westar Energy, Inc., Kansas Gas and Electric Company, Commission Staff and CURB Regarding Timing and Process for Inclusion of La Cygne Environmental Project Into Rate Base* (“Joint Application”), filed in Docket No. 15-GIME-025-GIE on July 21, 2014. In that Joint Application, KCP&L, Westar, Staff and CURB proposed to the Commission procedural schedules for KCP&L’s and Westar’s 2015 rate applications intended to avoid both companies filing their applications at the same time. To further alleviate some of the resource problems inherent in Staff and CURB auditing both companies during the same time period, the parties to the Joint Application agreed that Staff and CURB could begin their audits of the La Cygne Environmental Project prior to KCP&L and Westar filing their 2015 rate applications. The Commission approved the Joint Application by Order issued September 9, 2014. This petition is filed now so as to allow Staff and CURB a docket within which to issue discovery on the La Cygne Environmental Project costs and charge their time for conducting these advance audit activities.

5. In addition to opening the docket, KCP&L requests the Commission issue a Discovery Order and a Protective Order so that the process contemplated herein can commence. The Discovery Order should be limited to only matters related to the audit of the La Cygne Environmental Project until such time as KCP&L files its Application in this docket at which point full discovery would be permitted.

6. ***KCP&L understands and expressly acknowledges that the running of the 240-day statutory timeline in K.S.A. 66-117 will not start until the filing of the Application and supporting testimony and schedules as required by K.A.R. 82-1-231. Pursuant to K.S.A. 66-117(c), KCP&L hereby agrees to an extension of the 240-day statutory timeline to September 10, 2015, if such extension is necessary based upon the filing date of the Application in this docket.***

7. In addition to undersigned counsel, all correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

Darrin R. Ives
Vice President, Regulatory Affairs
Mary Britt Turner
Director, Regulatory Affairs
Kansas City Power & Light Company
One Kansas City Place
1200 Main, 19th Floor
Kansas City, MO 64105
Telephone: (816) 556-2522 (Ives)
Telephone: (816) 556-2874 (Turner)
Facsimile: (816) 556-2110
E-mail: darrin.ives@kpl.com
E-mail: mary.turner@kcpl.com

WHEREFORE, KCP&L respectfully requests that the Commission (1) issue an order approving the opening of this docket for the purposes set forth above, (2) issue a Protective Order and a Discovery Order limited initially to information related to the La Cygne Environmental Project as soon as possible to allow Staff and CURB to begin their pre-audit, and (3) for such other and further relief as the Commission deems just and reasonable.

Respectfully submitted,

/s/ Rob Hack

Rob Hack (#12826)
Lead Regulatory Counsel
Roger W. Steiner (#26159)
Corporate Counsel
Kansas City Power & Light Company
One Kansas City Place
1200 Main, 16th Floor
Kansas City, MO 64105
Telephone: (816) 556-2785
Facsimile: (816) 556-2787
E-mail: rob.hack@kcpl.com
E-mail: roger.steiner@kcpl.com

1e/ Glenda Cafer

Glenda Cafer (#13342)

Telephone: (785) 271-9991

Terri Pemberton (#23297)

Telephone: (785) 232-2123

CAFER PEMBERTON LLC

3321 SW 6th Avenue

Topeka, Kansas 66606

Facsimile: (785) 233-3040

E-mail: glenda@caferlaw.com

E-mail: terri@caferlaw.com

**ATTORNEYS FOR
KANSAS CITY POWER & LIGHT COMPANY**