

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Joint Application of Great Plains Energy Incorporated, Kansas City Power & Light Company, and Aquila, Inc., for Approval of the Merger of Aquila, Inc., with a Subsidiary of Great Plains Energy Incorporated and for Other Related Relief.)
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Case No. EM-2007-0374

**NOTICE OF DEPOSITION AND
REQUEST FOR PRODUCTION OF DOCUMENTS**

To: Parties of Record

Take notice that counsel for the Staff of the Missouri Public Service Commission will take the deposition of **William H. Downey**, President, Chief Operating Officer, and a member of the Board of Directors of Great Plains Energy, Inc. and President and Chief Executive Officer of Kansas City Power & Light Company, 1201 Walnut, Kansas City, MO 64106, on the 28th day of November 2007 at the 1201 Walnut headquarters building of Kansas City Power & Light Company, in Kansas City, Missouri, commencing at 3:30 p.m. The deposition will continue until completed or as otherwise agreed to by the parties.

Please take further notice that pursuant to the Missouri Rules of Civil Procedure, the deponent is hereby directed to bring to the deposition all documents described on Exhibit A attached hereto and incorporated herein by reference.

Respectfully submitted,

/s/ Nathan Williams

Nathan Williams
Deputy General Counsel
Missouri Bar No. 35512

Attorney for the Staff of the
Missouri Public Service Commission
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 19th day of November 2007.

/s/ Nathan Williams_____

EXHIBIT A

1. A job description of each employment position currently held by Mr. William H. Downey.
2. Copies of each and every severance, separation, or waiver and general release agreement, and job requirement for each and every employment position Mr. William H. Downey held during all, or any part, of the period 1990 through 2000.
3. Copies of each and every minute of the Board of Directors of Great Plains Energy related to the discussion or decision to merge Aquila with a Great Plains Energy affiliate. Staff data requests 256 and 257.
4. Copies of each and every minute of the Board of Directors of Kansas City Power & Light Company related to the discussion or decision to merge Aquila with a Great Plains Energy affiliate. Staff data requests 256 and 257.
5. Copies of each and every document (including, but not limited to, handwritten notes, drafts, writings, drawings, graphs, charts, photographs, electronic media presentations, electronic records or any other retrievable matter or data of any kind, however produced or reproduced) anyone provided to Great Plains Energy's Board of Directors relative to the discussion or decision to merge Aquila with a Great Plains Energy affiliate. Staff data requests 256 and 257.
6. Copies of each and every document (including, but not limited to, handwritten notes, drafts, writings, drawings, graphs, charts, photographs, electronic media presentations, electronic records or any other retrievable matter or data of any kind, however produced or reproduced) anyone provided to Kansas City Power & Light Company's Board of Directors relative to the discussion or decision to merge Aquila with a Great Plains Energy affiliate. Staff data requests 256 and 257.
7. Copies of each and every document (including, but not limited to, handwritten notes, drafts, writings, drawings, graphs, charts, photographs, electronic media presentations, electronic records or any other retrievable matter or data of any kind, however produced or reproduced) anyone received from Great Plains Energy's Board of Directors relative to the discussion or decision to merge Aquila with a Great Plains Energy affiliate. Staff data requests 256 and 257.
8. Copies of each and every document (including, but not limited to, handwritten notes, drafts, writings, drawings, graphs, charts, photographs, electronic media presentations, electronic records or any other retrievable matter or data of any kind, however produced or reproduced) anyone received from Kansas City Power & Light Company's Board of Directors relative to the discussion or decision to merge Aquila with a Great Plains Energy affiliate. Staff data requests 256, 257 and 286.
9. Copies of each and every document (including, but not limited to, handwritten notes, drafts, writings, drawings, graphs, charts, photographs, electronic media presentations, electronic records or any other retrievable matter or data of any kind, however produced or reproduced) related to any discussion by Great Plains Energy management, or their representative(s), with

state or federal regulators related to a merger of Aquila with a Great Plains Energy affiliate. Staff data requests 318, 319, 357 and 358.

10. Copies of each and every document (including, but not limited to, handwritten notes, drafts, writings, drawings, graphs, charts, photographs, electronic media presentations, electronic records or any other retrievable matter or data of any kind, however produced or reproduced) related to any discussion by Kansas City Power & Light Company management, or their representative(s), with state or federal regulators related to a merger of Aquila with a Great Plains Energy affiliate. Staff data requests 318, 319, 357 and 358.

11. Copies of each and every document (including, but not limited to, handwritten notes, drafts, writings, drawings, graphs, charts, photographs, electronic media presentations, electronic records or any other retrievable matter or data of any kind, however produced or reproduced) related to any discussion by Aquila management, or their representative(s), with state or federal regulators related to a merger of Aquila with a Great Plains Energy affiliate. Staff data requests 318, 319, 357 and 358.

12. Copies of documents that show, by employee title, the different levels of authority that different employees of Kansas City Power & Light Company have to make expenditures on behalf of Kansas City Power & Light Company.

13. Copies of each and every document (including, but not limited to, handwritten notes, drafts, writings, drawings, graphs, charts, photographs, electronic media presentations, electronic records or any other retrievable matter or data of any kind, however produced or reproduced) of the policies and procedures used for processing requests for approval to make expenditures on behalf of Kansas City Power & Light Company. Staff data requests 253, 254, 258, 259, 270 and 278.

14. Copies of Kansas City Power & Light Company's policies and procedures regarding Kansas City Power & Light Company employee acceptance of gifts from third parties. Information received from KCPL dated July 3, 2007 and October 25, 2007.

15. Copies of all agreements between Kansas City Power & Light Company and Great Plains Energy that are currently in effect. Staff data requests 287, 288, 291 and 361.

16. Copies of all testimony pre-filed in this case by or on behalf of the deponent.

17. Legible, printed copies of all workpapers prepared in the course of developing the deponent's testimony in this case.

18. Copies of all electronic or other communications or correspondence, documents, reports, prior Commission rulings or cases, data request responses, periodic monthly reports, letters, calculations, plans, drawings and other information upon which the deponent relied in forming deponent's opinions set out in his testimony in this case.

19. Copies of all agreements between Kansas City Power & Light Company and Aquila that are currently in effect. Staff data request 285.

20. Copies of Kansas City Power & Light Company operational review presentations made to the Kansas City Power & Light and Great Plains Energy Boards of Directors related to Kansas City Power & Light Company financial results in 2006 and 2007. Staff data requests 256 and 257, but not updated.

21. Copies of the current business plans of Great Plains Energy and Kansas City Power & Light Company. Staff data request 356.