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

In the Matter of the Application of Kansas City	)	
Power and Light Company for Approval to Make	)	
Certain Changes in its Charges for Electric Service	)	Case No. ER-2009-0089
to Continue the Implementation of its Regulatory	)	Tariff No. JE-2009-0192
Plan	)	

# 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 **Larry W. Loos**, Director of Black & Veatch Corporation's Enterprise Management Solutions Division, 11401 Lamar, Overland Park, KS 66211, on the 18<sup>th</sup> day of March 2009, at the offices of the Public Service Commission of Missouri located at 200 Madison Street in Jefferson City, Missouri, commencing at 1:00 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

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### **Certificate of Service**

I	hereby	certify	that	copies	of	the	foregoing	have	been	mailed,	hand-	delivered,
transmitte	ed by fac	esimile o	or elec	etronical	lly r	naile	d to all co	unsel o	f recor	d this 13	s <sup>th</sup> day	of March,
2009.												

<u>/s/ Nathan Williams</u>

#### **EXHIBIT A**

- 1. A copy of Larry Loos' testimony prefiled in this case—direct and rebuttal.
- 2. Each and every workpaper supporting the development of Larry Loos' jurisdictional allocators and jurisdictional allocation methodologies in this case.
- 3. Each and every prior testimony of Larry Loos filed in any case that supports the jurisdictional allocators and jurisdictional allocation methodologies he relied on in preparing his testimony in this case.
- 4. Each and every Kansas Corporation Commission order and Missouri Public Service Commission order Larry Loos relied on to develop the jurisdictional allocators he proposes and jurisdictional allocation methodologies he uses in this case.
- 5. Each and every FERC order, state order, and testimony Larry Loos relied on for the jurisdictional allocators and jurisdictional allocation methodologies he proposes in this case.
- 6. Each and every publication, article and text on jurisdictional allocations that Larry Loos relied on for the jurisdictional allocators and jurisdictional allocation methodologies he proposes in this case.
- 7. Each and every memorandum, letter, note and e-mail where Great Plains Energy or any of its affiliates, including Kansas City Power & Light Company provided guidance or direction to Larry Loos, his employer, or associates regarding jurisdictional allocators or jurisdictional allocation methodologies in this case.