## 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	)	Case No. EM-2007-0374
the Merger of Aquila, Inc., with a Subsidiary of	)	
Great Plains Energy Incorporated and for Other	)	
Related Relief	)	

# 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 **Richard C. Green,** Chairman, President and Chief Executive Officer of Aquila, Inc., 20 West Ninth, Kansas City, Missouri, on the 27<sup>th</sup> day of November 2007 at the 20 West Ninth headquarters building of Aquila, Inc., in Kansas City, Missouri, commencing at 1:00 p.m., or as otherwise agreed to by the parties. 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, transmitted by facsimile or electronically mailed to all counsel of record this 19<sup>th</sup> day of November 2007.

/s/ Nathan	Williams	

#### **EXHIBIT A**

- 1. Copies of each and every Aquila Board of Director meeting minute related to discussion of or the decision to merge Aquila with a Great Plains Energy affiliate. Staff data requests 281, 282, 285 and 292.
- 2. 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 Aquila's Board of Directors relative to the discussion or decision to merge Aquila with a Great Plains Energy affiliate. Staff data requests 281, 282, 285 and 292.
- 3. 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 Aquila's Board of Directors relative to the discussion or decision to merge Aquila with a Great Plains Energy affiliate. Staff data requests 281, 282, 285 and 292.
- 4. 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.
- 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) 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.
- 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) of any commitment by Aquila management or its Board of Directors not to charge Aquila's Missouri utility customers for costs related to Aquila's non-regulated operations.