

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

Eddie Shepherd,)	
)	
Complainant,)	
)	
v.)	File No. EC-2011-0373
)	
KCP&L Greater Missouri Operations)	
Company,)	
)	
Respondent.)	

**RESPONSE OF KCP&L GREATER MISSOURI OPERATIONS COMPANY TO
COMPLAINANT’S MOTION ON REQUEST FOR DISCOVERY**

KCP&L Greater Missouri Operations Company (“GMO”), by and through its legal counsel, submits to the Missouri Public Service Commission (“Commission”) response to the September 29, 2011 filing submitted, entitled “Motion On Request for Discovery” by the Complainant.

General Objection: Since Mr. Shepherd did not become a GMO customer until 2007 and his complaint concerns 2010-2011 billing issues, Mr. Shepherd’s discovery requests are overly broad, unduly burdensome and not reasonably calculated to lead to the production of admissible evidence.

REQUEST #1: “I need the work order on replacing transformer”

RESPONSE: In his August 9, 2011 subpoena, Mr. Shepherd requested the “work order replacing transformer hit by lightning.” The Commission in its September 2, 2011 Order, indicated that the lightning strike occurred in November 2004. GMO has searched its records and can find no such work order. The transformer was last replaced February 14, 2007 when

Aquila served Mr. Shepherd. GMO does not have a work order for the February 14, 2007 replacement. GMO will produce to Mr. Shepherd a work order for the March 11, 2010 replacement of an arrestor, which is located near the transformer.

REQUEST #2: “I need the Rest of Light Bill from 6/1/1991”

RESPONSE: In its September 2, 2011 Order, the Commission granted GMO’s request to limit the records produced to monthly bills for Mr. Shepherd from November 2004 to June 2011, therefore the monthly bills prior to November 2004 were not produced.

REQUEST #3: “I need name of the Supervise meter readers”

RESPONSE: In its September 2, 2011 Order, the Commission granted GMO’s request to limit the list produced to those meter readers assigned to Mr. Shepherd’s account from July 2010 to present. The names of these meter readers were provided to Mr. Shepherd. The Company will provide the name of the meter reader supervisor to Mr. Shepherd.

REQUEST #4: “I need work order to cut tree off power line form 8:30-9:30 PM”

RESPONSE: GMO has searched its records in the January – February 2011 timeframe (suggested by Mr. Shepherd (see p. 17, ll. 15-16 of September 8, 2011 prehearing conference transcript)) and has no record of the Company performing this task therefore no work order can be produced.

REQUEST #5: I need the names of the two men came out cut tree off power line form 8:30-9:30 that night.

RESPONSE: GMO has searched its records in the January – February 2011 timeframe (suggested by Mr. Shepherd (see p. 17, ll. 15-16 of September 8, 2011 prehearing conference transcript)) and has no record of the Company performing this task; therefore there are no names to produce.

REQUEST #6: “I need month Light Bill with ((17.000kwh) I paid off.”

RESPONSE: In its September 2, 2011 Order, the Commission granted GMO’s request to limit the records produced to monthly bills for Mr. Shepherd from November 2004 to June 2011. GMO provided these monthly bills to Mr. Shepherd.

REQUEST #7: “This information I request that I did not receive form KCP&L”.

RESPONSE: As shown above, GMO has responded to all of Mr. Shepherd’s discovery requests.

REQUEST #8: “The Plaintiff wins default”

RESPONSE: Mr. Shepherd is not entitled to a default judgment as GMO has fully responded to his discovery requests as modified by the Commission.

WHEREFORE, for the foregoing reasons, GMO respectfully requests that the Commission deny Mr. Shepherd’s Motion on Request for Discovery.

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner, MO #39586
Kansas City Power & Light Company
1200 Main Street, 16th Floor
Kansas City, MO 64105
Telephone: (816) 556-2314
Facsimile: (816) 556-2787
Email: Roger.Steiner@kcpl.com

Attorney for KCP&L Greater Missouri Operations Company

Certificate of Service

I hereby certify that a true and correct copy of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all parties of record on this 11th day of October, 2011.

/s/ Roger W. Steiner

Attorney for KCP&L Greater Missouri Operations Company