

**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 REQUEST FOR DISCOVERY**

KCP&L Greater Missouri Operations Company (“GMO”) submits to the Missouri Public Service Commission (“Commission”) its response to the December 7, 2011 email filing by Complainant.

1. Mr. Shepherd’s requests have been previously answered by GMO. In this response, GMO is supplying the same information that has already been submitted to Mr. Shepherd.

2. **REQUEST:** “Supervisor name is either Cheryl or Sharon”

**RESPONSE:** The Company provided this name to Mr. Shepherd via email on October 11, 2011, as well as its December 7, 2011 Amended Response to Order Regarding Discovery, Exhibit B.

3. **REQUEST:** “Meter reader name is the one who misread my meter at 17,000 kwh.”

**RESPONSE:** GMO has previously provided Mr. Shepherd with the names of the meter readers assigned to his account via email on September 15, 2011 as well as its December 7, 2011 Amended Response to Order Regarding Discovery, Exhibit A, Question 3.

4. **REQUEST:** “Lady’s name who came out and seen that she couldn’t read the meter from the road.”

**RESPONSE:** In its September 2, 2011 Order, the Commission granted GMO’s request not to produce this individual as she is not known.

5. **REQUEST:** “The man came out with Bill Warener to cut the tree off the line that night and need his name.”

**RESPONSE:** On November 14, 2011, GMO filed a response that stated Company records indicated that Bill Werner alone was dispatched to Mr. Shepherd’s residence on January 4, 2011.

WHEREFORE, for the foregoing reasons, GMO respectfully requests that the Commission find that GMO has responded to all of Mr. Shepherd’s discovery requests.

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner, MO #39586  
Kansas City Power & Light Company  
1200 Main Street, 16<sup>th</sup> Floor  
Kansas City, MO 64105  
Telephone: (816) 556-2314  
Facsimile: (816) 556-2787  
Email: [Roger.Steiner@kcpl.com](mailto: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 19<sup>th</sup> day of December 2011.

*/s/ Roger W. Steiner*

Attorney for KCP&L Greater Missouri Operations  
Company