

**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.)	

**KCP&L GREATER MISSOURI OPERATIONS COMPANY'S
AMENDED RESPONSE TO ORDER REGARDING DISCOVERY**

In KCP&L Greater Missouri Operations Company's ("GMO's") December 5, 2011 filing the exhibits were erroneously omitted. GMO hereby re-summits its response (with exhibits) to the Missouri Public Service Commission, ("Commission") November 25, 2011 Order to show compliance with Mr. Shepherd's data requests.

1. GMO supplied Mr. Shepherd with the names of all the meter readers assigned to his account via email on September 15, 2011. See attached exhibit A, page 2.
2. GMO supplied Mr. Shepherd with the meter reader supervisor's name via email on October 11, 2011. See attached exhibit B.

WHEREFORE, GMO respectfully requests that the Commission find that GMO has complied with all Mr. Shepherd's discovery requests.

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

Dated: December 7, 2011

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 7th day of December, 2011.

/s/ Roger W. Steiner

Attorney for KCP&L Greater Missouri Operations
Company

Parman Cathy

From: Parman Cathy
Sent: Thursday, September 15, 2011 2:56 PM
To: 'jennifer.hernandez@psc.mo.gov'; 'fistfulofgravel@hotmail.com'
Cc: Steiner Roger
Subject: FW: EC-2011-0373 Data Response
Attachments: GMO Response to DR 9-15-2011.pdf; Shepherd_Bills_2004 to 2011.PDF

The above is in response to Mr. Shepherds Data Request. A hard copy will be mailed to Mr. Shepherd

*Cathy Parman
Paralegal
Kansas City Power & Light
P.O. Box 418679
Kansas City, Mo 64141-9679
Phone: 816-701-0521
email: cathy.parman@kcpl.com
Facsimile: (816) 556-2787*

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**KCP&L GREATER MISSOURI OPERATIONS COMPANY'S RESPONSE TO
COMPLAINANT'S REQUEST FOR DISCOVERY**

1. "work order on replacing transformer"

Response: GMO has searched its records and can find no such work order. The transformer was changed out on 02/14/2007.

2. "account financial history date 6/1/1991-6/1/2011"

Response: The Commission granted GMO's request to limit the records produced to monthly bills for Mr. Shepherd from November 2004 to June 2011. Bills From 10/1/2004 to present are attached.

3. "list of names of all meter readers"

Response: 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. Shelly Davis, Primary Meter Reader, Heather Jarrett, Fill in Meter Reader and Rick Snips, Fill in Meter Reader.

4. "carroll steeby, strasser and the two men came out that night at 8:30-9:30 pm to cut the tree off powerline"

Response: GMO has searched its records in the January and February 2011 time frame (suggested by Mr. Shepherd) and has no record of the Company performing this task.

5. "Supean to testify Missouri Public Service Comm Investigators mary And the technical man talk to me on 4/15/2011"

Response: The Commission granted GMO's request not to produce these individuals as they are not Company employees.

6. "Supean light meter # sa40172754"

Response: GMO will bring meter to any hearing that is scheduled by the Commission.

7. "gayfred"

Response: The Commission granted GMO's request not to produce this individual as she is not a Company employee.

8. "Mary"

Response: The Commission granted GMO's request not to produce this individual as she is not a Company employee.

9. "Lightbill with ((17.000kwh) your average daily usage" **Note:** This request is found on Mr. Shepherd's subpoena and not in the Request for Discovery.

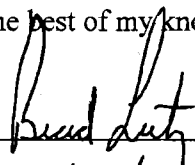
Response: The Commission granted GMO's request to limit the records produced to monthly bills for Mr. Shepherd from November 2004 to June 2011. Bills from 10/1/2004 to present are attached.

VERIFICATION OF RESPONSE

The above response is true and accurate to the best of my knowledge and belief.

Signed: _____

Date: _____


9/15/11

Wehry Nicole

From: Wehry Nicole
Sent: Tuesday, October 11, 2011 4:31 PM
To: 'jennifer.hernandez@psc.mo.gov'; 'fistfullofgravel@hotmail.com'
Cc: Steiner Roger
Subject: Case No. EC-2011-0373
Attachments: 3-11-10 Work Order.PDF

Attached please find the document referenced in KCP&L Greater Missouri Operations Company's Response to Complainant's Motion on Request for Discovery addressed in response to Request #1. Also, the name of the meter reader supervisor as outlined in response to Request #3 of the aforementioned document is Carrie Koelzer.

Nicole A. Wehry

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