

**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 November 4, 2011 Email filing by the Complainant.

1.     **REQUEST:** “The work order for changing the transformer on the pole”

**RESPONSE:** 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. On October 10, 2011 GMO emailed to Mr. Shepherd a work order for the March 11, 2010 replacement of an arrestor, which is located near the transformer.

2.     **REQUEST:** “The meter reader supervisors name”

**RESPONSE:** The Company provided the name of the meter reader’s supervisor to Mr. Shepherd via email on October 11, 2011.

3.     **REQUEST:** “The original meter reader that did not get out of the truck to read the meter”

**RESPONSE:** This request varies from Mr. Shepherd’s original request for a list of all meter readers. The meter readers assigned to Mr. Shepherd’s account were provided via email on September 15, 2011. GMO objects to this new request as being vague, ambiguous and not reasonably calculated to lead to the production of

admissible evidence. The list of issues filed in this case does not raise an issue related to meter readers.

4. **REQUEST:** “The worker that came out with Bill Warner to cut the limb off the line”

**RESPONSE:** A review of Company records on October 21, 2011 indicates that Bill Werner alone was dispatched to Mr. Shepherd’s residence on January 4, 2011.

5. **REQUEST:** “The lady who was sent out to see if the meter could be read 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. The meter readers assigned to Mr. Shepherd’s account were provided to Mr. Shepherd on September 15, 2011.

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

Respectfully submitted,

/s/ Roger W. Steiner

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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 14th day of November 2011.

***/s/ Roger W. Steiner*** \_\_\_\_\_

Attorney for KCP&L Greater Missouri Operations  
Company