

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

The Office of the Public Counsel and	)	
Midwest Energy Consumers Group,	)	
	)	
Complainants,	)	Case No. EC-2019-0200
	)	
v.	)	
	)	
KCP&L Greater Missouri Operations	)	
Company,	)	
	)	
Respondent.	)	

**KCP&L GREATER MISSOURI OPERATIONS COMPANY’S  
RESPONSE TO PUBLIC COUNSEL’S MOTION TO COMPEL**

COMES NOW KCP&L Greater Missouri Operations Company (“GMO” or “Company”) and, for its response to the Office of the Public Counsel’s (“OPC”) *Motion to Compel* (“Motion”), states as follows:

1. On June 6, 2019 OPC submitted data requests 30 and 32 (“DRs 30 and 32”) to Staff (“Staff”) for the Missouri Public Service Commission (“Commission”).
2. Staff objected to the DR’s on June 14, 2019.
3. On June 18, 2019, OPC filed its Motion seeking to compel the production of the documents specified and requested by DRs 30 and 32.
4. GMO does not object to Staff producing the documents requested by DRs 30 and 32 to OPC.

WHEREFORE, KCP&L Greater Missouri Operations Company respectfully submits this response to OPC’s Motion.

Respectfully submitted,

/s/ Robert J. Hack

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**Attorneys for KCP&L Greater Missouri  
Operations Company**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, postage prepaid, to all parties of record this 19<sup>th</sup> day of June 2019.

*/s/ Robert J. Hack*

Attorney for KCP&L Greater Missouri Operations  
Company