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August 14, 2006

**VIA EMAIL AND FACSIMILE**

Mr. Jeffrey A. Keevil  
Stewart & Keevil, L.L.C  
4603 John Garry Drive—Suite 11  
Columbia, MO 65203

RE: KCPL Objections to Trigen's 4<sup>th</sup> Set of Data Requests to KCPL;  
Case No. ER-2006-0314.

Dear Jeff:

Pursuant to 4 CSR 240-2.090, Kansas City Power & Light Company hereby objects to the following Data Requests issued to KCPL by Trigen in its 4<sup>th</sup> Set of Data Requests served on August 4, 2006 in the above-referenced matter.

KCPL Objection—Trigen DR No. 26

KCPL respectfully objects to providing the information requested in DR No. 26 on the ground that this data request is seeking information that is irrelevant and immaterial to the issues in this rate case, and is intended to obtain employee-specific information that would be of significant benefit to Trigen as a competitor of KCPL, but of no relevance to the ratemaking process.

KCPL Objection—Trigen DR No. 27 b and 27 c

KCPL respectfully objects to providing the information requested in DR No. 27 b and 27 c on the ground that this data request is seeking information that is irrelevant and immaterial to the issues in this rate case, and is intended to obtain information that would be of significant benefit to Trigen as a competitor of KCPL, but of no relevance to the ratemaking process. In addition, this DR requests historical information that is outside the scope of the test year in this proceeding.

KCPL Objection—Trigen DR No. 28

KCPL respectfully objects to providing the information requested in DR No. 28 on the ground that this data request is seeking information that is irrelevant and immaterial to the issues in this rate case, and is intended to obtain information that would be of significant benefit to Trigen as a competitor of KCPL, but of no relevance to the ratemaking process. DR No. 28 d-h further assumes unsupported facts regarding KCPL's marketing efforts, and DR No. 28 h seeks highly

sensitive, customer-specific and market-specific information that is of no relevance to the ratemaking process, but merely intended to provide Trigen with customer-specific information that would be beneficial to Trigen as a competitor of KCPL. Such discovery is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding; such discovery is vague, ambiguous, imprecise, and utilizes terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the request, the request is overly broad, unduly burdensome, expensive, oppressive and requires excessively time-consuming responses; the request is not limited to any stated period of time and, as such is overly broad and unduly burdensome; the requests seeks information not with KCPL's possession, custody, or control, nor does KCPL maintain such information in the ordinary course of business.

#### KCPL Objection—Trigen DR No. 29

KCPL respectfully objects to providing the information requested in DR No. 29 on the ground that this data request is seeking information that is irrelevant and immaterial to the issues in this rate case, and is intended to obtain information that would be of significant benefit to Trigen as a competitor of KCPL, but of no relevance to the ratemaking process. In addition, KCPL respectfully objects to providing the information requested in Question No. 29 on the ground that this data request contains argumentative statements of philosophy rather than requests for factual information. DR No. 29 a-h further assumes unsupported facts regarding KCPL's marketing efforts, and seeks highly sensitive, customer-specific and market-specific information that is of no relevance to the ratemaking process, but merely intended to provide Trigen with customer-specific information that would be beneficial to Trigen as a competitor of KCPL. Such discovery is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding; such discovery is vague, ambiguous, imprecise, and utilizes terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the request, the request is overly broad, unduly burdensome, expensive, oppressive and requires excessively time-consuming responses; the request is not limited to any stated period of time and, as such is overly broad and unduly burdensome; the requests seeks information not with KCPL's possession, custody, or control, nor does KCPL maintain such information in the ordinary course of business.

#### KCPL Objection—Trigen DR No. 30

KCPL respectfully objects to providing the information requested in DR No. 30 on the ground that this data request is seeking information that is irrelevant and immaterial to the issues in this rate case, and is intended to obtain information that would be of significant benefit to Trigen as a competitor of KCPL, but of no relevance to the ratemaking process. In addition, KCPL respectfully objects to providing the information requested in Question No. 30 on the ground that this data request contains argumentative statements of philosophy rather than requests for factual information. DR No. 30 further assumes unsupported facts regarding KCPL's marketing efforts, and seeks highly sensitive, customer-specific and market-specific information that is of no relevance to the ratemaking process, but merely is intended to provide Trigen with customer-

specific information that would be beneficial to Trigen as a competitor of KCPL.

KCPL Objection—Trigen DR No. 31

KCPL respectfully objects to providing the information requested in DR No. 31 on the ground that this data request is seeking information that is irrelevant and immaterial to the issues in this rate case, and is intended to obtain information that would be of significant benefit to Trigen as a competitor of KCPL, but of no relevance to the ratemaking process. In addition, KCPL respectfully objects to providing the information requested in Question No. 31 on the ground that this data request contains argumentative statements of philosophy rather than requests for factual information. DR No. 31 further assumes unsupported facts regarding KCPL's marketing efforts, and seeks highly sensitive, customer-specific and market-specific information that is of no relevance to the ratemaking process, but merely intended to provide Trigen with customer-specific information that would be beneficial to Trigen as a competitor of KCPL. In addition, DR No. 31 requests historical information that is outside the scope of the test year in this proceeding, and of no relevance to the ratemaking process. Such discovery is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding; such discovery is vague, ambiguous, imprecise, and utilizes terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the request, the request is overly broad, unduly burdensome, expensive, oppressive and requires excessively time-consuming responses; the request is not limited to any stated period of time and, as such is overly broad and unduly burdensome; the requests seeks information not with KCPL's possession, custody, or control, nor does KCPL maintain such information in the ordinary course of business.

KCPL Objection—Trigen DR No. 32

KCPL respectfully objects to providing the information requested in DR No. 32 on the ground that this data request is seeking information that is irrelevant and immaterial to the issues in this rate case, and is intended to obtain information that would be of significant benefit to Trigen as a competitor of KCPL, but of no relevance to the ratemaking process. In addition, KCPL respectfully objects to providing the information requested in DR No. 32 on the ground that this data request contains argumentative statements of philosophy rather than requests for factual information. DR No. 32 further assumes unsupported facts regarding KCPL's marketing efforts, and seeks highly sensitive, customer-specific and market-specific information that is of no relevance to the ratemaking process, but merely intended to provide Trigen with customer-specific information that would be beneficial to Trigen as a competitor of KCPL. In addition, DR No. 32 requests historical information that is outside the scope of the test year in this proceeding, and of no relevance to the ratemaking process. Such discovery is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding; such discovery is vague, ambiguous, imprecise, and utilizes terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the request, the request is overly broad, unduly burdensome, expensive, oppressive and requires

excessively time-consuming responses; the request is not limited to any stated period of time and, as such is overly broad and unduly burdensome; the requests seeks information not with KCPL's possession, custody, or control, nor does KCPL maintain such information in the ordinary course of business.

KCPL Objection—Trigen DR No. 34

KCPL respectfully objects to providing the information requested in DR No. 34 on the ground that this data request is seeking information that is irrelevant and immaterial to the issues in this rate case, and is intended to obtain information that would be of significant benefit to Trigen as a competitor of KCPL, but of no relevance to the ratemaking process. DR No. 34 seeks information regarding KCPL's cost of production that is of no relevance to the ratemaking process, but intended to give Trigen highly sensitive, competitive information regarding KCPL's costs of production of electricity and KCPL's strategic plans. In addition, DR No. 34 requests historical information that is outside the scope of the test year in this proceeding, and of no relevance to the ratemaking process. Such discovery is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding; such discovery is vague, ambiguous, imprecise, and utilizes terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the request, the request is overly broad, unduly burdensome, expensive, oppressive and requires excessively time-consuming responses; the request is not limited to any stated period of time and, as such is overly broad and unduly burdensome; the requests seeks information not with KCPL's possession, custody, or control, nor does KCPL maintain such information in the ordinary course of business.

KCPL Objection—Trigen DR No. 35

KCPL respectfully objects to providing the information requested in DR No. 35 on the ground that this data request is seeking information that is irrelevant and immaterial to the issues in this rate case, and is intended to obtain information that would be of significant benefit to Trigen as a competitor of KCPL, but of no relevance to the ratemaking process. In addition, DR No. 35 requests historical information that is outside the scope of the test year in this proceeding, and of no relevance to the ratemaking process. Such discovery is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding; such discovery is vague, ambiguous, imprecise, and utilizes terms that are subject to multiple interpretations but are not properly defined or explained for the purposes of the request, the request is overly broad, unduly burdensome, expensive, oppressive and requires excessively time-consuming responses; the request is not limited to any stated period of time and, as such is overly broad and unduly burdensome.

KCPL Objection—Trigen DR No. 37

KCPL respectfully objects to providing the information requested in DR No. 37 on the ground that this data request is seeking information that is irrelevant and immaterial to the issues in this

rate case, and is intended to obtain employee-specific information that would be of significant benefit to Trigen as a competitor of KCPL, but of no relevance to the ratemaking process.

KCPL Objection—Trigen DR No. 38

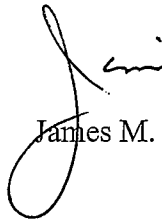
KCPL respectfully objects to providing the information requested in DR No. 38 on the ground that this data request is seeking information that is irrelevant and immaterial to the issues in this rate case, and is intended to obtain information that would be of significant benefit to Trigen as a competitor of KCPL, but of no relevance to the ratemaking process. DR No. 38 seeks information related to issues in Case No. HA-2006-0294 which was closed by the Commission on July 11, 2006. (Notice Closing Case, Case No. HA-2006-0294, July 11, 2006).

KCPL Objection—Trigen DR No. 39

KCPL respectfully objects to providing the information requested in DR No. 39 on the ground that this data request is seeking information that is irrelevant and immaterial to the issues in this rate case, and is intended to obtain customer-specific information that would be of significant benefit to Trigen as a competitor of KCPL, but of no relevance to the ratemaking process.

If you want to discuss this matter, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Fischer', written over the printed name.

James M. Fischer

cc: Tim Rush  
Curtis Blanc