

# Craig S. Johnson Andrew J. Sporleder Attorneys at Law

May 4, 2012

Nickie Hertzog 17609 191<sup>st</sup> Pleasant Hill, MO 64080

Re: Your request to the Missouri Public Service Commission to change electric suppliers from Osage Valley Electric to Kansas City Power and Light, file no. EO-2012-0343.

Ms. Hertzog:

I am Osage Valley's regulatory attorney assigned to this case. In order to respond to your request to change power suppliers, Osage Valley would like you to answer the enclosed discovery requests. I also enclose your undated "To Whom It May Concern" letter that these discover requests are targeted to.

Please put your answers in the blanks after each question, or feel free to put your answers in a separate document. Either way, please sign and return them to me. Osage Valley is scheduled to file a response to your application with the Commission May 16. If possible please get your responses back to me by noon, May 15.

Thanks,

Crafg S. Johnson

cc, via email:

Missouri Public Service Commission

Roger Steiner, KCPL Office Public Counsel

Daryl Veatch, Osage Valley Electric

#### **Public Service Commission**

To Whom It May Concern,

I am requesting that my service be changed from Osage Valley to KCP&L due to:

- 1. My area/road is serviced primarily by KCP&L. My property is one of the oldest on the road and for some reason was intially serviced by Osage Valley but has subsequently changed.
- 2. I have commercial property with substantial electric bills. KCP&L has an incentive for Solar Energy that Osage Valley does not have therefore reducing my electric bills, useage and alleviating my current financial burden of the property since selling my main company in an expensive divorce.
- 3. KCP&L already services the area and is probably more easily onsite.
- 4. If solar is utilized this will be more environmentally friendly.

Nickie Hertzog

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

In the Matter of the application of	)	
Nickie Hertzog for a Change of Electric	)	File No. EO-2012-0343
Supplier.	)	

### Osage Valley Electric Cooperative Association Discovery Requests to Nickie Hertzog

Osage Valley Electric Cooperative directs the following discovery requests to Applicant Nickie Hertzog in order for Osage Valley to have sufficient information to file a response to Ms. Hertzog's request for a change of power supplier, and requests that Ms. Hertzog provide answers to these requests as soon as practicable:

- 1. With respect to item 1 on your undated "To Whom it May Concern" letter attached with respect to paragraph 5 of her application, you state ".... your property was initially serviced by Osage Valley but has subsequently changed", please answer or explain the following:
  - a. is this referring to your residential property or a commercial property?

b. if you have more than one commercial property, please describe which commercial property you are referring to.

	c.	who provides electric service to this property now?
	d.	who provided electric service to this property prior to the change?
	e.	are you requesting that the Commission approve a change in electric
		suppliers for this property?
2.	With re	espect to item 2 on your undated "To Whom it May Concern" letter
attache	ed with 1	respect to paragraph 5 of your application, you state you "have commercial
proper	ty with	substantial electric bills. KCP&L has an incentive for Solar Energy that

Osage Valley does not have therefore reducing my electric bills, useage and alleviating my current financial burden of the property since selling my main company in an expensive divorce". Please answer or explain the following:

a. Please describe the commercial properties you are referring to.

b. Please specify which property was sold in or pursuant to a divorce.

c. Please specify by name and address to whom the property sold in or pursuant to a divorce was sold to.

d. For each property state who is the present electric power supplier.

e.	For each property state if you are requesting a change of supplier to KCP&L.
f.	Please describe the solar energy incentive provided by KCP&L, and attach copies of any documents you have describing this incentive.
g.	Please describe your solar energy generation plans.
h.	Please describe your solar energy purchase plans.

i.	Please explain your current financial burden of the property, and how changing power suppliers would affect that burden.			
j.	Please provide your analysis, and provide copies of it if in writing, as to			
	how utilizing the solar energy incentive would reduce your electric bills.			
3.	With respect to item 4 on your undated "To Whom it May Concern" letter			
attached with	respect to paragraph 5 of your application, you state "If solar is utilized			
this will be more environmentally friendly", please answer or explain the following:				
a.	Who would be generating the solar energy you refer to?			
b.	Who would be consuming the solar energy you refer to?			

c. Who would be purchasing the solar energy you refer to?

d. Please explain what energy you are comparing to solar energy when you say the solar energy "will be more environmentally friendly".

/s/Craig S. Johnson Craig S. Johnson Mo Bar # 28179 Johnson & Sporleder, LLP 304 E. High St., Suite 200 P.O. Box 1670 Jefferson City, MO 65102 (573) 659-8734 (573) 761-3587 FAX cj@cjaslaw.com

## Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was electronically mailed this 4<sup>th</sup> day of May, 2012 to PSC Staff, the Office of the Public Counsel, and Roger Steiner; and that a true and correct copy was mailed to Applicant Nickie Hertzog by US Mail, first class, postage prepaid, to her address as listed on the Commission's service list, 17609 191<sup>st</sup>, Pleasant Hill, MO 64080.

/s/Craig S. Johnson Craig S. Johnson