

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

In the Matter of Kansas City Power & Light)
Company's Request for Authority to Implement) **Case No. ER-2012-0174**
A General Rate Increase for Electric Service.) Tracking No. YE-2012-0404

and

In the Matter of KCP&L Greater Missouri)
Operations Company's Request for Authority) **Case No. ER-2012-0175**
To Implement a General Rate Increase for) Tracking No. YE-2012-0405
Electric Service.)

**OBJECTIONS TO NOTICE OF RECORDS DEPOSITION OF MELISSA K.
HARDESTY AND TO SUBPOENA *DUCES TECUM* TO MELISSA K. HARDESTY,
KANSAS CITY POWER & LIGHT COMPANY**

COME NOW Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operation Company ("GMO") and object to the Staff's Notice of Records Deposition of Melissa K. Hardesty (the "Notice") and object to the Staff's Subpoena *Duces Tecum* issued to Ms. Hardesty, KCP&L (the Subpoena"), as follows:

Staff identifies two sets of documents in the Notice and the Subpoena:

(1) Documents specified in Exhibit A attached to the subpoena.

OBJECTION: KCP&L and GMO object to the extent this request seeks attorney-client privileged information, attorney work product information, and/or accountant-client privileged information. Exhibit A is itself privilege logs previously prepared by KCP&L and previously provided by KCP&L to Staff. KCP&L and GMO adopt the logs that are Exhibit A to the Subpoena and Notice as privilege logs responsive to the Subpoena and Notice.

KCP&L and GMO further object that the Notice and Subpoena are unduly burdensome and oppressive in that the documents sought were previously requested via Data Requests from

Staff in these proceedings and KCP&L already responded to those Data Requests and timely objected as to the documents in Exhibit A.

(2) All documents and materials authored by, given to, or received by Ms. Hardesty regarding the Iatan 2 Advanced Coal Credits since beginning her employment with Kansas City Power & Light Company in December 2006 if not included among the items specified in Exhibit A attached to the subpoena.

OBJECTION: KCP&L and GMO object that the Notice and Subpoena are unduly burdensome and oppressive in that the documents sought were previously requested via Data Request from Staff in these proceedings and KCP&L already provided these documents to Staff. Without waiving their objections and subject to these objections, KCP&L and GMO state that documents responsive to this request were previously provided to Staff in responses to: Data Request Nos. 0292R, 0299R, 0184, 0200.2, 0216.2, 0275, 0276, 0277, 0278, 0279, 0280, 0281, 0282, 0283, 0284, 0285, 0286, 0287, 0288, 0289, 0290, 0291, 0292, 0293, 0294, 0295, 0296, 0297, 0298, 0299, 0300, 0301, 0302, 0303, 0304, 0305, 0306, 0307, 0308, 0309, 0310, 0311, 0312, 0313, 0314, 0315, 0316, 0317, 0318, 0319, 0320, 0321, 0322, 0323, 0324, 0325, 0326, 0327, 0328, 0329, 0330, 0331, 0332, 0333, 0334, 0335, 0336, 0337, 0338, 0339, 0340, 0341, 0342, 0343, 0344, 0345, 0346, 0347, 0448, 0449, 0453, 0468, 0470, 0515, 0516, 0517, 0518, and 0314.1 in Case No. ER-2012-0174; Data Request Nos. 123, 124, 124.1, 124.2, 124.3, 124.5, 135, 386, 539 and 566 in Case No. ER-2010-0355; Data Request Nos. 120 and 121 in Case No. ER-2010-0356; and Data Request Nos. 966 and 865R in Case No. EO-2010-0259.

Respectfully submitted,

/s/ Charles W. Hatfield

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this 27th day of September, 2012, on the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ Charles W. Hatfield

Attorney