



Diana M. Vuylsteke
Direct: 314-259-2543
Fax: 314-259-2020
dmvuylsteke@bryancave.com

June 17, 2011

VIA E-MAIL

Dean L. Cooper
Brydon, Swearingen & England P.C.
312 E. Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102

Todd J. Jacobs
Senior Attorney
Missouri Gas Energy
3420 Broadway
Kansas City, MO 64111

Re: Veolia Energy Kansas City, Inc. ("Veolia"), Case No. HR-2011-0241
Veolia's Objections to MGE-1.1 and MGE-1.2

Dear Dean and Todd:

This letter and attached document are to provide Veolia's Objections to Missouri Gas Energy's ("MGE") data requests 1.1 and 1.2 dated June 10, 2011. Veolia's General Objections are set forth in this letter and Veolia's Specific Objections are attached to this letter and incorporated herein by reference.

Veolia provides its objections and responses to MGE with the understanding that MGE will keep all of Veolia's information secure and will not use or disclose the information for any purpose other than preparing for the proceeding in Case No. HR-2011-0241. *See* 4 CSR 240-2.135(16).

GENERAL OBJECTIONS

1. Veolia objects to the Data Request to the extent that the response sought is overly broad, unduly burdensome, oppressive, and compliance with the request would be cost-prohibitive, impracticable and/or impossible.

2. Veolia objects to the Data Request to the extent that the request seeks information that is neither relevant, material, nor reasonably calculated to lead to the discovery of admissible evidence in Case No. HR-2011-0241.

Bryan Cave LLP
One Metropolitan Square
211 North Broadway
Suite 3600
St. Louis, MO 63102-2750
Tel (314) 259-2000
Fax (314) 259-2020
www.bryancave.com

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3. Veolia objects to the Data Request to the extent that the request seeks information and documents protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other privilege or doctrine. Nothing contained in these Objections is intended as a waiver of any applicable privilege or doctrine.

4. Veolia objects to the Data Request to the extent the request seeks information that is a trade secret, commercially sensitive, or confidential financial information, the release of which may be injurious to Veolia.

5. Veolia objects to the Data Request to the extent the request is overbroad, vague, ambiguous, confusing, or fails to describe the information sought with sufficient clarity or specificity to enable Veolia to provide responsive answers.

6. Veolia objects to the Data Request to the extent that the request calls for information or documents already in the Staff's possession or which is readily obtainable from another source that is equally available to Staff.

7. Veolia objects to the Data Request to the extent that it seeks information regarding its parent company or affiliates.

In MGE-1.1, MGE asks Veolia to provide copies of Veolia's responses to Commission Staff data requests 67 and 84. Staff's data request 84 (and numerous other data requests from Staff) specifically seek detailed operational, revenue, expense, cost, investment and customer information about affiliate Veolia Energy Missouri, Thermal North America, Inc., and/or other parent company or related affiliates.

Veolia Energy Missouri provides chilling service and does not provide steam service regulated by the Commission. Veolia's application does not seek approval or authority to adjust Veolia Energy Missouri's unregulated rates and charges or recover from its customers any expense or investment attributable to Veolia Energy Missouri's unregulated business.

Veolia objects to providing of detailed operational, revenue, expense, cost, investment and customer information about Veolia Energy Missouri to the extent such information is sought or intended to be applied in any manner other than assessing the allocation of joint and common costs between the regulated steam operations of Veolia and the unregulated chilling service of Veolia Energy Missouri – both wholly owned subsidiaries of Thermal North America, Inc.

8. These General Objections are applicable to, and incorporated in, each of the Objections below as if specifically set forth therein. The failure to repeat, renew or reassert any of the

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General Objections or the assertion of other objections in no way implies a failure to assert each and every General Objection in any way.

Veolia reserves the right to revise, correct, supplement or clarify any of the Objections set forth above.

Sincerely,

/s/ Diana M. Vuylsteke

Diana M. Vuylsteke

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