

**Missouri Public Service Commission
Case No. HR-2011-0241
Data Request No. MGE-1.1 to
Veolia Energy Kansas City, Inc.
Date Received: June 10, 2011
Objection Due: June 17, 2011
Response Due: June 27, 2011**

MGE DATA REQUEST 1.1:

Please provide MGE with a copy of Veolia's responses to Commission Staff data requests 67.0 and 84.0.

Send objections and responses to:

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ATTORNEYS FOR SOUTHERN UNION COMPANY, D/B/A MISSOURI GAS ENERGY

OBJECTION:

Veolia objects to the extent that this data request seeks information about its parent company and any other affiliated companies/divisions for the reasons set forth in Veolia's General Objections. The information sought would have no bearing on the subject matter of this case, which is Veolia's application for a general rate increase for steam service.

In addition to its General Objections, Veolia objects to this request to the extent that the information requested is privileged pursuant to the attorney work-product and the attorney-client privilege. Importantly, Veolia's responses to Staff's data request nos. 67 and 84 are designated

as “Highly Confidential” pursuant to 4 CSR 240-2.135 (1)(B) and/or “Proprietary” pursuant to 4 CSR 240-2.135(1)(A). Per 4 CSR 240-2.135(4), “Highly Confidential” information may only be disclosed to the attorneys of record or to outside experts that have been retained for the purpose of the case. Per 4 CSR 240-2.135(3), “Proprietary” information may be disclosed only to the attorneys of record for a party and to employees of a party who are working as subject-matter experts for those attorneys or who intend to file testimony in that case, or to persons designated by a party as an outside expert in that case.

Veolia further objects to the extent that Missouri Gas Energy has equal access to some of the documents requested by Staff in data request no. 84. Veolia further objects to the extent that the request is overbroad, burdensome, cost-prohibitive, and impractical, and would place an undue burden upon Veolia. Veolia further objects to the extent that the request seeks information that is neither relevant, material nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to these objections, a response will be provided to MGE-1.1.

**Missouri Public Service Commission
Case No. HR-2011-0241
Data Request No. MGE-1.2 to
Veolia Energy Kansas City, Inc.
Date Received: June 10, 2011
Objection Due: June 17, 2011
Response Due: June 27, 2011**

MGE DATA REQUEST 1.2:

Referring to pages 401a, 401b and 402 of Trigen/Veolia's annual reports to the Commission, please provide:

- a) Copies of pages 401a, 401b and 402 of Trigen/Veolia's annual reports to the Commission for 2009 (amended annual report) and 2010; and,
- b) A reconciliation of fuel burned to generate steam to the actual amount of steam generation for 2008, 2009 and 2010 (refer to page 402 of the annual reports) (e.g. 1 mlb of steam = X mmbtu).

OBJECTION:

In addition to its General Objections, Veolia objects to the extent that the request seeks information that is neither relevant, material nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to these objections, a response will be provided to MGE-1.2.

