

Commissioners

JEFF DAVIS Chairman

CONNIE MURRAY
ROBERT M. CLAYTON III
LINWARD "LIN" APPLING
TERRY JARRETT

Missouri Public Service Commission

POST OFFICE BOX 360 JEFFERSON CITY MISSOURI 65102 573-751-3234 573-751-1847 (Fax Number) http://www.psc.mo.gov

WESS A. HENDERSON Executive Director

DANA K. JOYCE Director, Administration and Regulatory Policy

ROBERT SCHALLENBERG Director, Utility Services

NATELLE DIETRICH Director, Utility Operations

COLLEEN M. DALE Secretary/Chief Regulatory Law Judge

> KEVIN A. THOMPSON General Counsel

March 11, 2008

Ms. Colleen M. Dale, Secretary Missouri Public Service Commission 200 Madison Street P.O. Box 360 Jefferson City, MO 65102

RE: EM-2007-0374 Subpoenas Duces Tecum

Dear Ms Dale:

The Staff of the Missouri Public Service Commission (Staff) hereby requests that you in your capacity as the Secretary of the Missouri Public service Commission (Commission) and pursuant to Sections 386.040, 386.250(1) and (7), 386.320.3, 386.390.4, 386.420.2, 386.440(1) and (2), 393.140.8, 393.140.9, 393.140.10 and 4 CSR 240-2.100 issue subpoenas duces tecum to Michael Cline, Michael Chesser, William Downey, Stephen Easley, John Grimwade, Brent Davis, Terry Foster, Lori Cheatum, Steve Jones, Chris Giles and Terry Bassham in an effort to obtain information relevant to whether it is detrimental to the public interest for Great Plains Energy to acquire Aquila.

The documents sought and purpose of questioning these individuals is to gain information about (1) the state of the financial health of Great Plains Energy; (2) whether, under current circumstances, there will be negative financial consequences to Great Plains Energy, Kansas City Power & Light Company and/or Aquila if Great Plains Energy acquires Aquila; (3) the consequences of the payment of the cash value of Aquila's non-Missouri utility assets to Aquila's shareholders instead of using those funds to finance Aquila's current Missouri utility construction needs; (4) Great Plains Energy's new position regarding the likelihood that Great Plains Energy can produce enough synergies while avoiding service deterioration and past experience in achieving savings; (5) how well Kansas City Power & Light Company actual results compare to prior commitments it has made to this Commission, including financial estimates made in those commitments; (6) how Great Plains Energy and Kansas City Power & Light Company actually conduct business in comparison to their codes of conduct, ethics, integrity, transparency and how that compares to how Aquila conducts business, in particular respecting third party vendors; and (7) how construction at Iatan is affecting the financial health

of Great Plains Energy and Kansas City Power & Light Company as well as their ability to execute all the merger/consolidation commitments they claim they will perform without detrimental results.

Thank you for your assistance.

Very truly yours,

/s/ Steven Dottheim

Steven Dottheim Chief Deputy General Counsel Missouri Bar No. 29149

Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360
Jefferson City, MO 65102
(573) 751-7489 (Telephone)
(573) 751-9285 (Fax)
steve.dottheim@psc.mo.gov (e-mail)