

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

The Office of the Public Counsel and	)	
The Midwest Energy Consumers Group,	)	
	)	
Complaints,	)	
	)	
v.	)	<b><u>File No. EC-2019-0200</u></b>
	)	
KCP&L Greater Missouri Operations	)	
Company,	)	
	)	
Respondent	)	

**STAFF’S RESPONSE TO PUBLIC COUNSEL’S MOTION TO COMPEL**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through undersigned counsel, and submits its Response to Public Counsel’s Motion to Compel.

1. On June 18, 2019, the Office of the Public Counsel (“OPC”) filed its *Motion for Order to Compel Staff to Produce Documents* related to OPC Data Requests (“DRs”) 30 and 32.

2. Also on June 18, 2019, the Commission issued its *Order Establishing Time to Respond to Motion to Compel* ordering Staff to respond to OPC’s Motion by June 20, 2019.

3. On June 19, 2019, KCP&L Greater Missouri Operations Company (“GMO”) filed its *Response to Public Counsel’s Motion to Compel*, stating that “GMO does not object to Staff producing the documents requested by DRs 30 and 32 to OPC.”

4. Because GMO does not object to the production of GMO's document to OPC, Staff will produce the documents requested by DRs 30 and 32 to OPC.

**WHEREFORE**, Staff hereby tenders its *Response to Public Counsel's Motion to Compel* for the Commission's information and consideration.

Respectfully Submitted,

**/s/ Casi Aslin**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to all counsel of record this 20<sup>th</sup> day of June, 2019.

**/s/ Casi Aslin**