

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

In the Matter of the Application of Kansas City )  
Power & Light Company for an Order )      Case No. EU-2014-0255  
Authorizing Construction Accounting. )

**STAFF'S REQUEST FOR RULING ON OBJECTION**

**COMES NOW** the Staff of the Missouri Public Service Commission and requests that the Commission rule on Kansas City Power & Light Company's objection (attached) to Staff data request no. 25 (also attached) by which Staff requested the following information:

For each and every data request response, please provide the identity of all Great Plains Energy and Kansas City Power & Light personnel that are responsible for the actual data request response for those data requests that have already been responded to and all those that will be responded in this Case No. EU-2014-0255.

The basis of Kansas City Power & Light Company's objection is that Commission Rule 4 CSR 240-2.090(2) "does not require this information be provided when responding to data requests."

The objection has no merit, and, although Kansas City Power & Light Company raises neither relevance nor that Staff's request is not reasonably calculated to lead to the discovery of admissible information, identifying who has provided the substance of Kansas City Power & Light Company's responses to Staff's data requests will allow Staff to identify who to depose if it decides to explore in discovery the scope of the knowledge of that person or those persons.

**WHEREFORE**, the Staff of the Missouri Public Service Commission requests that this Commission overrule Kansas City Power & Light Company's objection and

order Kansas City Power & Light Company to provide the identity of all Great Plains Energy and Kansas City Power & Light Company personnel that are responsible for the actual data request response for those data requests that have already been responded to and all those that will be responded in this Case No. EU-2014-0255 as Staff has requested.

Respectfully submitted,

**/s/ Nathan Williams**  
Nathan Williams  
Deputy Staff Counsel  
Missouri Bar No. 35512  
Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
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(573) 751-8702 (Telephone)  
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[nathan.williams@psc.mo.gov](mailto:nathan.williams@psc.mo.gov) (e-mail)

**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 30<sup>th</sup> day of July, 2014.

**/s/ Nathan Williams**

**Missouri Public Service Commission**  
**Data Request**

<b>Data Request No.</b>	0025
<b>Company Name</b>	Kansas City Power & Light Company-Investor(Electric)
<b>Case/Tracking No.</b>	EU-2014-0255
<b>Date Requested</b>	7/17/2014
<b>Issue</b>	General Information and Miscellaneous - Other General Info & Misc.
<b>Requested From</b>	Lois J Liechti
<b>Requested By</b>	Nathan Williams
<b>Brief Description</b>	Data Request Signatures
<b>Description</b>	For each and every data request response, please provide the identity of all Great Plains Energy and Kansas City Power & Light personnel that are responsible for the actual data request response for those data requests that have already been responded to and all those that will be responded in this Case No. EU-2014-0255. Data Request submitted by Cary Featherstone (cary.featherstone@psc.mo.gov).
<b>Due Date</b>	8/6/2014

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EU-2014-0255 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Kansas City Power & Light Company-Investor(Electric) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Kansas City Power & Light Company-Investor(Electric) and its employees, contractors, agents or others employed by or acting in its behalf.

<b>Security</b>	Public
<b>Rationale</b>	NA



**Law Department**

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July 24, 2014

**VIA EMAIL:** [Nathan.Williams@psc.mo.gov](mailto:Nathan.Williams@psc.mo.gov)

Mr. Nathan Williams  
Deputy Staff Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102-0360

**Re:** *File No. EU-2014-0255*  
*Data Request 0025*

Dear Nathan:

This letter is in response to the above data request which Kansas City Power & Light Company ("Company") received on July 17, 2014. This letter should be considered an objection on behalf of the Company to the data request, in accordance with Missouri Public Service Commission ("Commission") Rule 4 CSR 240-2.090(2). The Company objects in that the same aforementioned Commission rule does not require this information be provided when responding to data requests. Answers to data requests need not be under oath or be in any particular format but shall be signed by a person who is able to attest to the truthfulness and correctness of the answers.

As has been customary, however, if the Commission Staff has questions about the meaning of a particular data request response by the Company, or otherwise believes a discussion of the response with Company personnel would be helpful, we would be willing to arrange a meeting with the appropriate personnel for that purpose. We believe this approach has worked well in the past. With regard to questions pertaining to the Accounting Authority Order, please contact Tim Rush (816-556-2344) or Linda Nunn (816-701-0512).

Please advise if you would like to discuss.

Sincerely,

*lsl Roger W. Steiner*

Roger W. Steiner

RWS/naw