

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

In the Matter of the Application of Kansas City)
Power & Light Company for Approval to Make)
Certain Changes in its Charges for Electric) **File No. ER-2010-0355**
Service to Continue the Implementation of Its)
Regulatory Plan)

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for) **File No. ER-2010-0356**
Approval to Make Certain Changes in its Charges)
for Electric Service)

**STAFF RESPONSE TO KCPL’S AND GMO’S SUGGESTIONS IN SUPPORT OF KCPL’S
AND GMO’S MOTION OF FOR PROTECTIVE ORDER TO QUASH
HEARING AND DEPOSITION SUBPOENAS**

Comes now the Staff of the Missouri Public Service Commission (Staff) through the Staff Counsel’s Office in response to the Suggestions In Support of the Motion For Protective Order Of Kansas City Power & Light Company (KCPL) And KCP&L Greater Missouri Operations Company (GMO) To Quash Hearing And Deposition Subpoenas. Although the Commission has not issued an Order directing the Staff to respond, it occurs to the Staff that the statements made by KCPL/GMO regarding the Staff’s request for the production of documents respecting the deposition of Mr. David McDonald might be clarified by a further Staff response. Therefore, in limited response, the Staff states, as follows:

1. KCPL/GMO indicate that they do not understand whether the Staff meant in paragraph 4 of Attachment A of the Staff’s Subpoena For Deposition for Mr. David McDonald, e-mails to or from Mr. McDonald’s supervisors or all Company supervisors, and whether “project managers” only means Iatan Construction Project “project managers.” The Staff believes that it has indicated in its most recent filing earlier today that it is amenable to limiting

its discovery request to documents from Mr. McDonald to his supervisors and that the term “project managers” means Iatan Construction Project “project managers.”

Wherefore the Staff files its limited response to KCPL’s AND GMO’s Suggestions In Support Of Motion For Protective Order Of Kansas City Power & Light Company (KCPL) And KCP&L Greater Missouri Operations Company (GMO) To Quash Hearing And Deposition Subpoenas.

Respectfully submitted,

/s/ Steven Dottheim
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or emailed to all counsel of record this 21th day of January, 2011.

/s/ Steven Dottheim