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Director, Utility Operations

STEVEN C. REED
Secretary/General Counsel

KEVIN A. THOMPSON
Chief Staff Counsel

December 23, 2009

Mr. Steve Reed, Secretary
Missouri Public Service Commission
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102

RE: ER-2009-0089 Request for Subpoena Duces Tecum

Dear Mr. Reed:

The Staff of the Missouri Public Service Commission (Staff) requests that you issue a subpoena duces tecum to William H. Downey, President and Chief Operating Officer of Kansas City Power & Light Company, Inc., requiring that he produce the severance agreement with Terry Murphy requested in Data Request 0837 in Commission Case No. ER-2009-0089. Obtaining this document will lead to evidence regarding the reasonableness of the severance cost charged to the construction project.

Kansas City Power & Light has withheld the severance agreement of Terry Murphy within the scope of Staff Data Request 0837 in Case No. ER-2009-0089.

Thank you for your assistance.

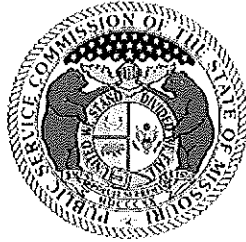
Sincerely,

A handwritten signature in cursive script that reads "Jaime N. Ott".

Jaime N. Ott
Legal Counsel
(573) 751-8700 (Telephone)
(573) 751-9285 (Fax)

SUBPOENA DUCES TECUM

Order to Produce Documents



THE STATE OF MISSOURI

SERVE: William Downey
President and Chief Operating Officer
Kansas City Power & Light Company, Inc.
1200 Main
Kansas City, MO 64141

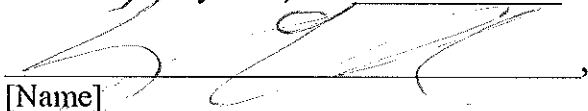
To: Kansas City Power & Light Company, Inc. William Downey, President and Chief Operating Officer, 1200 Main, Kansas City, MO 64141.

You are hereby commanded to produce the severance agreement between Kansas City Power & Light Company, Inc. and Terry Murphy pursuant to Staff Data Request 0837 to the Staff's Counsel Office of the Public Service Commission by the 4th day of January in the year 2010 at 200 Madison Street, Jefferson City, Missouri 65102.

In accord with Sections 386.040, 386.250(1) and (7), 386.320.3, 386.390.4, 386.440(1) and (2), 393.140.8, 393.140.9 RSMo (2000), and 4 CSR 240-2.100, Staff request copies of the severance agreement between Kansas City Power & Light Company, Inc and Terry Murphy as requested in Staff Data Request 0837 in Commission Case No. ER-2009-0089.

Hereof fail not at your peril. The person or officer serving this writ is commanded to have the same at the time and place aforesaid, certifying thereon its return.

Given under my hand, this 23rd day of DECEMBER,

 _____, SECRETARY
[Name] [Title]

RETURN

I HEREBY CERTIFY that I have served the within writ by reading the same in the presence and hearing of the within named _____ on the _____ day of _____, _____, in _____ County, in the State of Missouri.

_____, _____
[Name] [Title]