

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

AG PROCESSING INC A COOPERATIVE,)	
Complainant,)	
)	
vs.)	HC-2010-0235
)	
KCP&L GREATER MISSOURI OPERATIONS)	
COMPANY,)	
Respondent.)	

SUBPOENA DUCES TECUM

TO: GARY CLEMENS
KCP&L GREATER MISSOURI OPERATIONS COMPANY

You are hereby commanded, to be an appear personally at a deposition before The Public Service Commission of the State of Missouri or any Commissioner thereof at the instance of Ag Processing Inc for the purpose of giving sworn deposition testimony at the offices of Finnegan, Conrad & Peterson, LC, 3100 Broadway, Suite 1209, Kansas City, Missouri, on ~~October~~ ^{NOVEMBER} 3, 2010 at 10:00 a.m., in the above entitled and numbered cause, and to bring for use in the above numbered an styled cause, all books, papers, documents, electronic materials, items, things and other written or electronic compilations set forth in the schedule identified as Exhibit A which is attached and incorporated by reference, and to remain there in attendance from day to day until discharged by counsel for Ag Processing Inc or by order of the Commission.

Given under my hand, this 27th day of October, 2010.

Morris F. Woodruff Chief Judge
Commissioner or Secretary

Exhibit A

Definition Used:

"Document" or "documents," as used herein shall mean any kind of written, recorded or graphic matter, however produced or reproduced, of any kind or description, whether sent or received or neither, including originals, non-identical copies (whether different from the original because of marginal notes, or other material inserted therein or attached thereto, or otherwise) and drafts and both sides thereof, including, but not limited to: papers; books; letters; correspondence; telegrams; cables; telex messages; e-mail messages; reports and recordings of telephone or other conversations or other interviews or conferences of other meetings; affidavits; pleadings; summaries; opinions; reports; stays; analyses; evaluations; contracts; agreements; ledgers; journals; statistical records; desk calendars; appointment books; diaries; lists; tabulations; sound recordings; computer print-outs; data processing records; microfilm; photographs; maps; charts; accounts; financial statements or reports thereof; promissory notes; loan agreements; loan files and all notes contained within loan files; revolving credit agreements; deeds of trust; guaranty agreements or other indemnification agreements; real estate contracts for sale or lease; appraisals; all records kept by electronics, photographic or mechanical means; pleadings and all other things similar to any of the foregoing, however denominated. For purposes of these subpoenaed items, the term "your company" or "company" refers either to Aquila or to KCP&L GMO as the context may require.

1. All documents in your possession, custody or control that you believe contain information regarding the effective date of any Quarterly Cost Adjustment.

2. All documents in your possession, custody or control that you believe contain information regarding whether or not costs collected by your company with respect to any Quarterly Cost Adjustment Period for 2006 or 2007 of the Aquila Steam Hedging Program are or are not presently subject to the jurisdiction of the Missouri Public Service Commission.

3. All documents in your possession, custody or control that you believe contain information regarding whether or not costs collected by your company with respect to any Quarterly Cost Adjustment Period for 2006 or 2007 are or are not subject to the jurisdiction of the Missouri Public Service Commission to order any refund including the periods covered by Case Nos. HR-2007-0028 and HR-2007-0399

4. All documents in your possession, custody or control that you believe contain information regarding whether or not costs resulting from the Aquila Steam Hedging Program and col-

lected by your company are properly before the Missouri Public Service Commission for review as part of Case Nos. HR-2007-0028 or HR-2007-0399.

5. All documents in your possession, custody or control that you believe contain information regarding the manner in which the QCA mechanism under review in Case Nos. HR-2007-0028 and HR-2007-0399 came into being, the respective time periods covered by each, and each periodic rate filing made pursuant to such authorization.

6. All documents in your possession, custody or control that you believe contain information regarding any authorization to conduct the Aquila Steam Hedging Program and/or approval of such program.

7. All documents in your possession, custody or control that you believe contain information regarding the date or dates on which the Aquila Steam Hedging Program was implemented by Aquila, Inc. and the authorization thereof by a management person or persons and the identity of such person or persons.

8. All documents in your possession, custody or control that you believe contain information regarding requests for consent from steam customers or Missouri Public Service Commission Staff from Aquila, Inc or KCP&L GMO and all documents in your possession, custody or control that you believe contain information regarding such consent.

9. All documents in your possession, custody or control that you believe contain information regarding any advice sought by Aquila, Inc or KCP&L GMO from steam customers or from Missouri Public Service Commission Staff and any advice that was provided by any entity.

10. All documents in your possession, custody or control that you believe contain information regarding the calculation of the book costs of the Aquila Steam Hedging Program that were charged and collected under the Quarterly Adjustment in Case No. HR-2007-0028 and in Case No. HR-2007-0399 or either of them.

11. All documents in your possession, custody or control that you believe contain information regarding the manner in which the Aquila Steam Hedging Program affected the physical gas supply arrangements made by Aquila, Inc. in any manner whatsoever, and the reliability thereof, including without limitation, effects upon the physical adequacy and reliability of steam service that was provided to steam customers by Aquila, Inc.

12. All documents in your possession, custody or control that you believe contain information regarding the intended, designed and implemented goals of the Aquila Steam Hedging

Program including without limitation all documents in your possession, custody or control that you believe contain information regarding the evaluation and measurement of the Aquila Steam Hedging Program and any index of measurement that was employed.

13. All documents in your possession, custody or control that you believe contain information regarding any interrelationship between the Aquila Steam Hedging Program and any other natural gas hedging program used or employed by Aquila, Inc. or by any of its affiliates or divisions that were acquired by KCP&L GMO.

14. All documents in your possession, custody or control that you believe contain information regarding the termination of the Aquila Steam Hedging Program, the dates on which it was terminated (if it was) and the reasons for terminating the program.

15. All documents in your possession, custody or control that you believe contain information regarding the accounting treatment that was accorded the costs of the Aquila Steam Hedging Program subsequent to its termination.

16. All documents in your possession, custody or control that you believe contain information regarding any data on which Aquila based its decision to enter into the Aquila Steam Hedging Program, and the date on which such decision was made including how such data was obtained.

17. All documents in your possession, custody or control that you believe contain information regarding any unplanned delay in commencing operations by a large steam customer or customers in St. Joseph, Missouri and any assessment or reaction thereto by Aquila, Inc.

18. All documents in your possession, custody or control that you believe contain information regarding any consultations that have occurred between you, your employees, representatives or assigns and other persons concerning the subject matter of this complaint.

19. All documents in your possession, custody or control that you believe contain information regarding any inquiry or investigation by Great Plains management regarding the Aquila Steam Hedging Program including any internal documents that concern or touch on such inquiry and the results of such inquiry.

20. All documents in your possession, custody or control that you believe contain information regarding discussions leading to the presentation of the QCA Stipulation in Case No. HR-2005-0450 to the Commission.

21. All documents in your possession, custody or control that you believe contain information regarding requests by any steam customer to implement a gas hedging program and the contents and particulars of the operations of such program requested.

22. All documents in your possession, custody or control that you believe contain information regarding the discussion or discussions you reference at page 5, lines 3-4 in your prepared testimony submitted herein on October 22, 2010.

23. All documents in your possession, custody or control that you believe contain information regarding the discussion or discussions referenced at page 5, lines 16-18 in your prepared testimony submitted herein on October 22, 2010.

24. All documents in your possession, custody or control that you believe contain information regarding the discussion or discussions referenced at page 6, lines 3-14 in your prepared testimony submitted herein on October 22, 2010.

25. All documents in your possession, custody or control that you believe contain information regarding the discussion or discussions referenced at page 7, lines 7-9 in your prepared testimony submitted herein on October 22, 2010.

26. All documents in your possession, custody or control that you believe contain information regarding the discussion or discussions referenced at page 7 lines 17-20 in your prepared testimony submitted herein on October 22, 2010.

27. All documents in your possession, custody or control that you believe contain information regarding the discussion or discussions referenced at page 8 lines 19-21 in your prepared testimony submitted herein on October 22, 2010 and in particular any request by AGP therein referenced.

28. All documents in your possession, custody or control that you believe contain information regarding the discussion or discussions referenced at page 9 lines 5-19 in your prepared testimony submitted herein on October 22, 2010.

Stu Conrad

From: Zobrist, Karl [karl.zobrist@snrdenton.com]
Sent: Wednesday, October 27, 2010 4:31 PM
To: stucon@fcplaw.com
Cc: 'Thompson, Kevin'; Ritchie, Samuel; Gilbreath, Lisa A.; Steiner Roger
Subject: AgP v. KCP&L GMO: Subpoena for Dennis R. Williams
Follow Up Flag: Follow up
Flag Status: Green

[REDACTED]

We will accept the subpoena on behalf of Gary Clemens, although I need to contact him to see if he can appear Nov. 3. I would prefer an early afternoon starting time because of prior commitments.

Karl Zobrist
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