

## Missouri Public Service Commission

Data Request

**Data Request No.** 0651  
**Company Name** Kansas City Power & Light Company-Investor(Electric)  
**Case/Tracking No.** ER-2010-0355  
**Date Requested** 1/14/2011  
**Issue** Rate Base - Other Rate Base Issues  
**Requested From** Lois J Liechti  
**Requested By** Chuck Hyneman  
**Brief Description** Documents from Schiff re April 2010 Invoice

**Description** Reference Schiff Hardin invoice number 1517033 for work performed in April 2010: 1. Please provide a copy of the Unit 2 Risk Assessment including all attachments 2. Please provide a copy of all Risk Matrix white papers 3. Please provide a copy of all white papers regarding engineering, procurement and start-up cost packages for the 2010 cost reforecast 4. Please provide a copy of the white paper on T-23 5. Please provide a copy of all white papers to support the cost reforecast 6. Please provide a copy of all white papers ever created, reviewed, or approved by Schiff Hardin (including all subcontractors) for Iatan 1, Iatan 2, or KCPL, other than the white papers requested above. 7. Re Gould 4/13/10. Please provide a copy of the brief prepared for mediation 8. Re Glover 4/5/10. Please provide the ball in court report and KCPL correspondence related to this issue 9. Please provide a copy of each and every settlement agreement in which Schiff Hardin created and/or reviewed on the Iatan construction project (except the agreements previously provided) 10. What was the purpose of the expenditure of \$1,408 on color copies between 4/23/10 and 4/29/10. Please provide an electronic copy of these documents. 11. Re Okizaki 4/22/10. Please provide a copy of the Facilitation Memorandum 12. Re Glover 4/20/10. Please provide a copy of the contractor summaries chart 13. Re Gould 4/13/10. Please provide a copy of the Project Status Report 14. Re Schermer 4/8/10. Please provide a copy of each and every "Project Daily Blast" 15. Re Okizaki 4/7/10. Please provide a copy of the FTI Report  
**Due Date** 1/24/2011

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. ER-2010-0355 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.

**Security** Public  
**Rationale** NA

KCPL Exhibit No. 96  
 Date 1-27-11 Reporter TW  
 File No. ER-2010-0355