

Discovery Request from Judge Harold Stearley in November 2009
 Source: Regulatory Affairs Department
 Updated to March 24, 2010

Exhibit

ER-2009-0089 KCPL-MO ER-2009-0090 GMO-Elec HR-2009-0092 GMO-Steam 09-KCPE-246-RTS KCP&L-KS All Cases

Approximate number of Documents/Invoices Provided in Response to Data Requests

Number of Data Requests	1,913 (a)	985	117	526	3,541
Number of Attachments					
Electronic in CaseWorks	27,165	9,999	1,548	4,382	
CD's, DVD's, jump drives	33,522	13,553	0	7,757	
Hard copy	189	44	0	0	
Provided to Engineering	145	0	0	0	
Hard copy from Legal Dept	9,566	0	0	0	
Total Attachments	70,587	23,596	1,548	12,139	107,870
Data file size (Megabytes)					
Electronic in CaseWorks	234.1	136.9	50	96	
CD's, DVD's, jump drives	60,671	11,084	0	8,612	
Provided to Engineering	4,520	0	0	0	
Total Electronic Files-Mb	65,424	11,221	50	8,708	85,403

Approximate Total Page Count of These Documents

Electronic files (b)	3,271,212	561,064	2,494	435,379	
Hard copy attachments (c)					
To Audit Staff	17,800	3,400		93,154	
Audit from KCPL Legal	55,894				
To Engineering Staff	16,060				
Total Approx Pages	3,360,966	564,464	2,494	528,533	4,456,456

Number of Meetings to Discuss Information and Resolve Issues

Main Case	49 (d)	13	1	4	
Construction Audit					
Audit Staff	41	1	0	0	
Engineering Staff	32	0	0	0	
Total	122	14	1	4	141

NOTES

(a) MPSC Staff - 1,554; Other Parties - 359. The data request quantity at 3-24-2010 includes 345 KCPL DR's for subsequent, informal and recurring DR's not previously reflected in the count. Includes 439 data requests received subsequent to Commission's June 10, 2010 Order.

(b) Conversion rates from megabyte to pages differ depending on file type. Microsoft Word = 63 pages per Mb; Excel = 161 pages/Mb, Images = 15 pages/Mb. A approximate average conversion of 50 pages per Mb was used.

(c) New ream of paper - 2 inches = 500 sheets. Use conversion of 2-1/2 inches = 500 sheets

	Inches	No. of Pages
KCPL-MO		
To Audit Staff	89	17,800
Subpoena/from Legal	279	55,894
To Engineering Staff	80	16,060
KCPL-MO	449	89,754
GMO-Elec	17	3,400
GMO-Steam	0	0
KCPL-KS	0	0
	466	93,154

(d) Includes 27 joint KCPL/GMO meetings

FILED

MAY 6 2010

Missouri Public Service Commission

KCPL-MO Exhibit No. 3
 Date 4-22-10 Reporter KF
 File No. EO-2010-0259