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March 29, 2000

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Mr. James W. Brew
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1025 Thomas Jefferson Street, NW
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Washington, DC 20007

FILED²
APR 04 2000
**Missouri Public
Service Commission**

RE: Case No. EC-99-553

Dear Mr. Brew:

To ensure that GST has had access to non-privileged documents that are responsive to its data requests relating to the Hawthorn Incident, I convened a series of meetings with members of the Cause Team, and reviewed documents that are under the control of the members of the team, as opposed to being stored in the master file room. Most of these documents are duplicates of documents that are stored in the master file room. However, some of the documents are not stored in the master file room. These documents are listed on the enclosed privilege log.

On March 6, 2000, I represented to Judge Thompson and you that KCPL did not retain the Cause & Effect chart. This statement is inaccurate. During one of the subsequent meetings with the Cause Team, I learned that one of the members of the team had created an incomplete version of the Cause & Effect chart in electronic form, and saved a hard copy of the chart. He no longer has the electronic version of the Cause & Effect chart. However, he retained a hard copy of the chart. The chart is listed on the enclosed privilege log.

Below I have provided a response to each of the highlighted sections contained in certain weekly reports and minutes prepared by the Cause Team. Many of the referenced documents are stored in the master file room. In fact, GST already has copies of some of these documents.

Minutes – March 11, 1999

First Highlighted Item Mr. Johnson provided a verbal report.

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Second Highlighted Item **Still Under Investigation**

Third Highlighted Item The PMAX data points are stored in the master file room.

Fourth Highlighted Item The Cause Team decided not to create a hard copy of its plan to test hardware.

Fifth Highlighted Item Members of the Cause Team do not believe the chronology was ever created.

Minutes – March 25, 1999

First Highlighted Item This report is stored in the master file.

Second Highlighted Item Ms. Kaifes never updated the timeline. The original Cause & Effect chart was discarded. KCPL experimented with creating the original chart in electronic form. KCPL retained a hard copy of this chart. This document is listed on the enclosed privilege log.

Cause Team Report (Gas Team)

The team cannot locate a copy of the request sent to Maxon.

Minutes – April 1, 1999

The Cause Team never received an Operational write-up on gas system from Parsons and Holland, the team received a gas table which is stored in the master file room.

Progress Report – April 1, 1999

First Highlighted Item The "flip chart" was used by the Cause Team during the data gather portion of the investigation to record the documents that were needed for the investigation. After the documents were collected, the flip chart was discarded. If the "letter" to J. Krumm still exists, it is in the master file room.

Second Highlighted Item The original Cause & Effect chart was discarded. KCPL experimented with creating the original chart in electronic



form. KCPL retained a hard copy of this chart. This document is listed on the enclosed privilege log.

Third Highlighted Item KCPL did not save the problem definition statement.

Fourth Highlighted Item The referenced photographs were taken by Crawford Investigations. KCPL does not have copies of these photographs. The PMAX print-out is stored in the master file room.

Progress Report – April 8, 1999

First Highlighted Item The original Cause & Effect chart was discarded. KCPL experimented with creating the original chart in electronic form. KCPL retained a hard copy of this chart. This document is listed on the enclosed privilege log.

Second Highlighted Item The gas and air flows are stored in the master file room.

Progress Report – April 8, 1999

Highlighted Item The original Cause & Effect chart was discarded. KCPL experimented with creating the original chart in electronic form. KCPL retained a hard copy of this chart. This document is listed on the enclosed privilege log.

Progress Report – April 22, 1999

First Highlighted Item These documents are stored in the master file room.

Second Highlighted Item This document is stored in the master file room.

Progress Report – April 22, 1999

Highlighted Item The Cause & Effect chart is listed on the enclosed privilege log. All holds relating to Hawthorn are stored in the master file room.

Progress Report – April 29, 1999

If this e-mail exists, it is stored in the master file room.



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Progress Report – April 29, 1999

All documents relating to the gas valves are located in the master file room.

Contact me if you have any questions or concerns.

Sincerely yours,

Gerald A. Reynolds

cc: Judge Kevin A. Thompson
Lera L. Shemwell
James M. Fischer
Karl Zobrist
Timothy G. Swensen