

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Construction Audit and)
Prudence Review of Environmental Upgrades)
To Iatan 1 and Iatan Common Plant, Including All)
Additions Necessary for These Facilities to)
Operate.)

Case No. EO-2010-0259

**KANSAS CITY POWER & LIGHT COMPANY'S AND GMO'S (1) RESPONSE TO
ORDER ESTABLISHING INVESTIGATORY DOCKET AND SETTING ON-THE-
RECORD PROCEEDING; AND (2) RESPONSE TO STAFF MOTION TO OPEN
CONSTRUCTION AUDIT AND PRUDENCE REVIEW INVESTIGATION CASE**

COME NOW Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO")(collectively the "Companies"), by and through counsel, and file the following in order to respond to (1) the Commission's Order Establishing Investigatory Docket And Setting On-The-Record Proceeding issued on March 15, 2010 ("March 15 Order"); and (2) Staff Motion To Open Construction Audit And Prudence Review Investigation Case filed on March 12, 2010 ("Staff Motion"), and state as follows:

RESPONSE TO ORDER SETTING ON-THE-RECORD PROCEEDING

1. The Commission's March 15 Order, among other things, scheduled an on-the-record proceeding for Tuesday, April 6, 2010 beginning at 2:00 p.m. The Commission directed that the "parties shall be prepared to provide a complete explanation of every aspect of the on-going construction and prudence audit that was ordered to be completed on December 31, 2009." (March 15 Order, p. 3). In addition, the March 15 Order directed Staff to "make available all Staff members who have participated in the audit," and required that "If any party intends to tender expert witnesses at the on-the-record proceeding scheduled for April 6, 2010, they shall

file a pleading disclosing the identity and biographical background of those experts no later than March 30, 2010.” (Id.)¹

2. The Companies wish to inform the Commission that they welcome the scheduling of the on-the-record proceeding to address the critical issues related to Staff’s construction and prudence audit of the Iatan 1 AQCS and the Common Plant used to operate Iatan 1. The Companies believe it is critically important for the Commission to address the Staff’s failure to comply with the Commission’s directives and Staff’s unilateral attempt to modify the Commission’s order concerning the audit. Rather than comply with the Commission’s June 10 order to complete its audit by December 31, 2009, Staff’s filings appear to attempt to extend the time to complete its construction and prudence audit beyond 2009 – something this Commission expressly ordered it not to do.

3. The Companies are not opposed to Staff’s continued inquiry into allocation issues related to what costs should be allocated between Iatan 1 and Iatan 2. However, it is inappropriate for Staff to be suggest additional prudence disallowances not already identified in the Staff’s December 31, 2009 reports. Similarly, the Companies are not opposed to Staff’s review of invoices related to Iatan 1 and Common Plant that were not available at the end of 2009, but this review should be in the nature of a "true-up" of the numbers rather than an inquiry into additional prudence issues.

4. In order “to address every aspect of the on-going construction and prudence audit that was ordered to be completed on December 31, 2009,” the Companies suggest that at least the following issues should be the subject of the on-the-record proceeding:

- (a) What is the appropriate scope of the construction and prudence audits ordered to be completed by December 31, 2009? Staff has announced that it intends to

¹ Attached as "Attachment 1" is biographical background information concerning the Companies' witnesses.

ignore the December 31, 2009 deadline because it needs to review additional documents in order to complete its audit. Although Staff has not identified exactly what it still needs, the Commission should make the following inquiries:

- 1) whether receipt and review of all invoices is necessary to reach conclusions on the prudence of business decisions and investments;
- 2) what information has already been available to the Staff concerning the prudence of decisions and investments and what has the Staff done to avail itself of that information;
- 3) whether the Companies have already provided Staff with access to all relevant personnel and information necessary to reach conclusions on the prudence of decisions made about Iatan I, Common Plant necessary to Iatan 1, Jeffrey and Sibley;
- 4) after receiving quarterly reports since 2006 and conducting site visits since February 2007 concerning Iatan 1 and Common Plant information, what more does the Staff need in order to decide whether investment decision were prudent;
- 5) what has been the nature and scope of the Staff's construction and prudence review of Iatan 1 and Common Plant;
- 6) whether Staff is applying the correct legal standard concerning a prudence audit when it asserts that each and every invoice is necessary to reach conclusions about prudence;
- 7) whether Staff's current discovery and investigation has focused on prudence or instead on financial issues which may or may not be included in a future rate case [See Attachment 2, a listing of all the data requests received from Staff in Case No. ER-2009-0089 since the Commission's June 10, 2009 order]; and
- 8) whether allocation issues between Iatan 1 and Iatan 2 are prudence issues.

COMPANY WITNESSES: Blanc, Nielson, Rush, and Giles.

STAFF WITNESSES TO BE CROSS EXAMINED: Schallenberg, Hyneman, and Majors.

- (b) What are Staff's reasons for failing to produce an audit during the last rate case and wishing to continue the audit that was due December 31, 2009? The Commission should inquire into the excuses raised by Staff for its failure to complete the audits which should have been done a year before the scheduled hearing. Staff's claims fall into two categories: Discovery and cost tracking. As to discovery, the Commission should take testimony concerning: 1) the number of discovery requests served by Staff and the number of those complied with by the Companies; 2) the reasons Staff failed to bring issues to the Commission concerning discovery compliance if Staff felt the Companies were being dilatory; 3) whether the Companies provided sufficient resources to comply with discovery requests and acted in good faith when objecting to discovery requests; 4) whether the Staff's requests have been unduly burdensome, failed to take into account that requests might be objectionable and not properly focused on prudence issues, or whether those requests drifted far afield from prudence review and into minute details more appropriate for a financial audit; 5) whether discovery conducted by Staff has focused on prudence issues or digressed into financial reviews of items that may or may not be included in a future rate case [*See Attachment 2*]; and 6) what additional discovery is pending and whether that discovery is relevant and not unduly burdensome given that the audit should have been completed some time ago.

As to cost tracking, the Staff has raised the issue of the adequacy of the Companies' cost tracking systems. The Commission should hear testimony about 1) the cost tracking systems in place; 2) whether those systems are consistent with industry standards; 3) whether those systems adequately track costs; 4) how long the Staff has known about the systems and what the Staff has done to understand and utilize the systems; 5) whether the Companies adopted the cost tracking systems for any dilatory reasons or whether they were adopted based on industry standards and in the best interests of the Companies; and 6) what information Staff needs for a prudence audit that is not captured by the cost tracking systems.

COMPANY WITNESSES: Blanc, Nielson, Rush and Giles.

STAFF WITNESSES TO BE CROSS EXAMINED: Schallenberg, Hyneman, and Majors.

- (c) What is Staff's goal with respect to completing the December 31, 2009 audit? In order to rule on Staff's request to continue auditing, the Commission should inquire into Staff's goals regarding the audit. Does Staff intend to produce another audit report in addition to the one filed on December 31, 2009? Does Staff believe this audit report could include recommendations for additional disallowances over and above those agreed to by the Staff in the April 24, 2009 and May 22, 2009 settlement agreements with the Companies capping any potential disallowances related to Iatan 1 at \$30 million for KCP&L and \$15 million for GMO?

COMPANY WITNESSES: Blanc, Nielson, Rush, and Giles.

STAFF WITNESSES TO BE CROSS EXAMINED: Schallenberg, Hyneman, and Majors.

- (d) What is the current status of Staff's audits? The Commission should hear testimony on: 1) what is Staff's proposed new end date for the audit; 2) what resources are required to complete the audit; 3) what information will be required of the Companies; and 4) what caused Staff not to complete its audit.

COMPANY WITNESSES: Blanc, Nielson, Rush, and Giles.

STAFF WITNESSES TO BE CROSS EXAMINED: Schallenberg, Hyneman, and Majors.

- (e) Are the Companies being treated fairly in the auditing process? The Commission should inquire into the way Staff has conducted the audit in terms of demands on the Companies. In addition, the Commission should hear testimony about whether the Staff's missing of deadlines and failure to request relief from the Commission has deprived the Companies of the fair treatment to which they are entitled from the Commission and its Staff. The Commission should also inquire into the impact on the Companies' cost of capital as a result of Staff's failure to complete the audit and thus identify the specific issues to be considered in future proceedings.

COMPANY WITNESSES: Blanc, Rush, Giles, and Cline.

STAFF WITNESSES TO BE CROSS EXAMINED: Schallenberg, Hyneman, and Majors.

5. As indicated above, the Companies do not believe the Commission has scheduled adequate time for a full examination of all aspects of the audits and requests the Commission schedule two days for the on-the-record hearing in this matter in order to accommodate witnesses and cross examination. The Companies also request a procedural order from the Commission

providing guidance on the issues to be addressed, the order of presentations and witnesses and the order of cross-examination.

6. At the conclusion of the Commission's on-the-record review of the audits, the Companies request that the Commission make at least the following findings and conclusions:

(a) Staff's prudence review of Iatan 1 and Common Plant is complete and Staff may not present proposed prudence adjustments on prudence in the upcoming rate case concerning Iatan 1 and Common Plant other than what is contained in the audit report filed on December 31, 2009.

(b) The Companies have not engaged in any dilatory or unreasonable practices in responding to discovery during the prudence audit, thus leaving in tact the prudence disallowance caps established in the April 24, 2009 and May 22, 2009 settlement agreements.

(c) The Companies' cost control system is not in violation of any Commission order and is sufficient to identify and track costs of the Iatan construction projects.

RESPONSE TO STAFF'S MOTION TO OPEN INVESTIGATORY DOCKET

7. In the Staff Motion, the Staff requested that the Commission "(a) formally open a case for a construction audit and prudence review investigation of the costs respecting Iatan 1 AQCS, Iatan Common Plant, and Iatan 2 and to receive in said investigation proceeding the information and materials obtained by Staff in the context of Case No. EM-2007-0374 and Case/File Nos. ER-2009-0089 and ER-2009-0090, and (b) direct KCPL and GMO to follow

Commission Rule 4 CSR 240-2.090, in particular, as it relates to data requests.”² (Staff Motion, p. 10)

8. Perhaps more important than the request to open an investigatory docket, Staff has now candidly admitted that “it has continued its investigation into KCPL’s prudence of Common Plant-Remainder and Iatan 2 and Iatan 1 AQCS and Common Plant Used to operate Iatan 1. The Staff is actively investigating KCPL’s expenditures for reasonableness and prudence.” (Staff Motion, p. 8)(*Emphasis added*)

9. The Staff’s continued investigation of the reasonableness and prudence of Iatan 1 AQCS and Common Plant used to operate Iatan 1 is in direct contravention of the Commission’s Order Regarding Joint Motion To Extend Filing Date issued on June 10, 2009 in Case Nos. ER-2009-0089 and ER-2009-0090 (“June 10 Order”) in which the Commission ordered as follows:

“4. The Staff of the Missouri Public Service Commission shall complete and file the construction audit and prudence review of the environmental upgrades at Iatan 1, including all additions necessary for these facilities to operate, no later than December 31, 2009.

5. The Staff of the Missouri Public Service Commission is directed to provide a specific rationale for each and every disallowance recommended in the construction audits and prudence reviews.” (June 10 Order, p. 2)(*Emphasis added*)

10. The Companies support the Commission’s creation of Case No. EO-2010-0259, *sua sponte*, as a repository for filings related to the construction and prudence audits related to the Iatan 1 and Iatan 2 construction projects. The creation of Case No. EO-2010-0259 by the Commission has rendered moot the request of Staff for the creation on a new investigatory docket. However, the creation of Case No. EO-2010-0259 does not address Staff’s request in the Staff Motion to continue its prudence investigation into the Iatan 1 AQCS and Common Plant

² The Companies are willing to follow Commission Rule 4 CSR 240-2.090, including the use of data requests, in the context of Case No. EO-2010-0259. However, this agreement does not constitute a waiver of any objections to the use of specific forms of discovery in future proceedings.

used to operate Iatan 1 in violation of the June 10 Order. The Companies are adamantly opposed to this Staff request, and intend to fully address this motion at the April 6 on-the-record proceeding. Following the on-the-record proceeding, the Commission should order that Staff discontinue further auditing of the Iatan 1 AQCS and Common Plant related to Iatan 1. Staff should not be permitted to add to the list of prudence disallowances already contained in its *Staff's Report Regarding Construction Audit And Prudence Review Of Environmental Upgrades To Iatan 1 and Iatan Common Plant* filed in Case Nos. ER-2009-0089 and ER-2009-0090 on December 31, 2009. The Companies are not opposed to Staff's continued inquiry into allocation issues related to what costs should be allocated between Iatan 1 and Iatan 2. However, it is inappropriate for Staff to suggest additional prudence disallowances not already identified in the Staff's December 31, 2009 reports. Similarly, the Companies are not opposed to Staff's review of invoices related to Iatan 1 and Common Plant that were not available at the end of 2009, but this review should be in the nature of a "true-up" of the numbers rather than an inquiry into additional prudence issues.

WHEREFORE, the Companies respectfully request that the Commission adopt the recommendations of the Companies contained herein. In particular, the Companies request that the Commission (1) allow the parties to present witnesses to provide a complete explanation of every aspect of the on-going construction and prudence audit that was ordered to be completed on December 31, 2009; (2) allow the parties to engage in cross-examination of witnesses; (3) schedule two days for the on-the-record proceeding; and (4) following the completion of the on-the-record proceeding, the Commission should enter its Order that Staff discontinue further auditing of the Iatan 1 AQCS and Common Plant related to Iatan 1 and be prohibited from adding to the list of prudence disallowances already contained in its *Staff's Report Regarding*

Construction Audit And Prudence Review Of Environmental Upgrades To Iatan 1 and Iatan Common Plant filed in Case Nos. ER-2009-0089 and ER-2009-0090 on December 31, 2009 in this or any future proceeding.

Respectfully submitted,

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ATTORNEYS FOR KCP&L AND GMO

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served either by electronic mail or by first class mail, postage prepaid, on this 22nd day of March 2010 to counsel for all parties of record.

/s/ James M. Fischer

James M. Fischer

ATTACHMENT 1

Curtis Blanc:

Curtis received a Bachelor of Science degree from Washington University in St. Louis with majors in Finance and Economics. He also received a *Juris Doctor* from the George Washington University, National Law Center. Prior to coming to KCP&L, he worked as an attorney in private practice first at Shook, Hardy & Bacon, LLP, then at Vinson & Elkins, LLP, representing energy companies primarily before the Federal Energy Regulatory Commission (the "FERC"). Curtis came to KCP&L in 2005 as in-house regulatory counsel and continued in that role until being promoted to his current position in July 2009.

Tim Rush:

Tim received a Master of Business Administration degree from Northwest Missouri State University in Maryville, Missouri. He did his undergraduate study at both the University of Kansas in Lawrence and the University of Missouri in Columbia. He received a Bachelor of Science degree in Business Administration with a concentration in Accounting from the University of Missouri in Columbia. He was hired by KCP&L in 2001 as the Director, Regulatory Affairs. Prior to his employment with KCP&L, Tim was employed by St. Joseph Light & Power Company ("Light & Power") for over 24 years. At Light & Power, Tim was Manager of Customer Operations from 1996 to 2001, where he had responsibility for the regulatory area, as well as marketing, energy consultant and customer services area. Customer services included the call center and collections areas. Prior to that, Tim held various positions in the Rates and Market Research Department from 1977 until 1996. He was the manager of that department for fifteen years.

Chris Giles:

Chris graduated from the University of Missouri at Kansas City in 1974 with a Bachelor of Arts degree in Economics and in 1981 with a Master of Business Administration degree with concentrations in accounting and quantitative analysis. He was first employed at KCP&L in 1975 as an Economic Research Analyst in the Rates and Regulation Department. He held positions as supervisor and manager of various rate functions until 1988 when he was promoted to Director of Marketing. In January 1993, he returned to the rate area as Director, Regulatory Affairs. In March of 2005, he was promoted to Vice President, Regulatory Affairs. His responsibilities included all aspects of regulatory activities including cost of service, rate design, revenue requirements, and tariff administration. Chris retired from that position in June 2009. He is currently a consultant for KCP&L. His responsibilities include assisting and advising the current Senior Director, Regulatory Affairs. In this capacity, he remains actively involved in KCP&L's regulatory strategy and the oversight of the Iatan Unit 2 Project.

Michael Cline:

Michael graduated from Bradley University in 1983 with a B.S. in Finance, summa cum laude. He earned an MBA from Illinois State University in 1988. From 1984-1991, he was employed

by Caterpillar Inc. in Peoria, Illinois and held a number of finance and treasury positions. From 1992-1993, he was Manager, International Treasury at Sara Lee Corporation in Chicago, Illinois. From 1994-2000, he was employed by Sprint Corporation in Overland Park, Kansas, initially as Manager, Financial Risk Management and then as Director, Capital Markets. During most of 2001, he was Assistant Treasurer, Corporate Finance, at Corning Incorporated in Corning, New York. He joined Great Plains Energy in October 2001 as Director, Corporate Finance. He was promoted to Assistant Treasurer in November 2002. During 2004, he was assigned to lead the Company's Sarbanes-Oxley Act compliance effort on a full-time basis, though he retained the Assistant Treasurer title during that time. He was promoted to Treasurer in April 2005 and added the title of Chief Risk Officer in July 2005. In February 2008, Michael was named to his current position as Vice President-Investor Relations and Treasurer. He is also a candidate for the Chartered Financial Analyst designation from the CFA Institute.

Dr. Kris Nielsen:

Kris is the President and Chairman of Pegasus Global Holdings, Inc. (Pegasus-Global), a management consulting firm that provides services to the utility industry and other industries. He is the Director of this engagement for Pegasus-Global.

Kris earned a doctorate in Infrastructure Systems (Civil) Engineering from Kochi University of Technology in Kochi, Japan in 2005, a Doctorate of Jurisprudence from George Washington University Law School in Washington D.C. in 1970, and a Bachelor of Mechanical Engineering degree from Princeton University in 1967. He has over 40 years of experience, including 27 as a management consultant in utility prudence and management reviews, evaluations and audits. He has authored over 100 papers and publications including the area of prudence and utility management. His power plant experience includes nearly 90 power plants. He has testified 90 times of which over 40 of those testimonies involved power plant projects. He has performed extensive work on behalf of both public and private sector clients, on a wide-range of complex, global engagements involving the construction, engineering, and procurement of large projects with long-lead times. He has an extensive background in engineering, construction and project management, including controls and scheduling.

He has also presented expert witness testimony in legal proceedings around the world including numerous Commission dockets regarding the prudence of multiple power plants. As a senior Pegasus-Global leader or member on risk management or strategic consulting engagements, and he has undertaken and led performance and prudence audits, evaluations and assessments of project-specific and corporate risk.

He has been involved with pre-design, engineering, procurement, construction, and commissioning work for mega and large projects like the development of Iatan Unit 1, which includes significant experience in bidding and bid solicitation for such projects, procurement, constructability reviews, schedule resource loading and activity evaluation, code and permitting processes, due diligence studies, overhead calculations, quality assurance and control, startup and operations, commissioning, testing and maintenance. He has worked on engineering and construction projects in over 60 countries.

He has performed prudence audits, management and performance audits, and technical analyses and provided expert testimony before regulatory bodies, in court and in arbitration hearings in the following areas: Utility Management Prudence; Corporate/Utility Management; Economics of the Construction and

Utility Industries; Project Controls; Engineering/Procurement Management; Project/Construction Management; Nuclear/Fossil Licensing/QA/QC; Cost Engineering/CPM Scheduling; and Construction Law/Disputes Analysis.

Attachment 2:

Staff Data Requests Subsequent to Commission's June 10, 2009 Order

Attached are the more than 400 data requests KCP&L has received from Staff in Case No. ER-2009-0089 since the Commission issued its June 10, 2009 order directing Staff to "complete and file the construction audit and prudence review of the environmental upgrades at Iatan 1, including all additions necessary for these facilities to operate, no later than December 31, 2009." Of those data requests, more than 100 pertain to expense reports of KCP&L employees. More than 50 data requests pertain to how KCP&L employees are reimbursed for mileage. By contrast, only about a dozen data requests pertain to expenditures by Alstom, Kiewit, or Burns & McDonnell, the principal vendors responsible for the construction of Iatan 1, Iatan 2, and the common facilities necessary to operate those units.

Attachment 2

ER-2009-0089

Requestor	Date Received	Item No.	Question
Hyneman Chuck	6/11/09	629	1. Please provide a 1) a list of each and every vendor that has provided or currently provides goods or services to Iatan 1, Iatan 2, Iatan common in which the KCPL has a contract for those goods or services which includes a liquidated damages provision and 2) a description of those goods or services. 2. For each and every vendor listed in number 1 above, please provide either a copy of the contract containing the liquidated damages provision or identify the previous data request responses or subpoenas where this contract was provided to the Staff. 3. Please provide a copy of all documents (including electronic documents) related to KCPL or GMO or Westlar making a claim reserving its right or privilege notice to a vendor regarding potential or actual liquidated damages as it related to the construction projects listed in number 1 above.
Hyneman Chuck	6/11/09	630	1. Please provide a list of each and every vendor that has provided or currently provides goods or services to Iatan 1, Iatan 2, and Iatan common, in which the Company does have a contract with the vendor but has not issued a purchase order for those goods or services. For each vendor, please provide the amount of funds paid to the vendor and charged to the construction project to date and the amount of funds expected to be paid to the vendor at project completion. 2. Please provide a list of each and every vendor that has provided or currently provides goods or services to Iatan 1, Iatan 2, and Iatan common in which the Company does not have a contract with the vendor and has not issued a purchase order for those goods or services. For each vendor, please provide the amount of funds paid to the vendor and charged to the construction project to date and the amount of funds expected to be paid to the vendor at project completion.
Featherstone Cary	6/17/09	0543S	a) Please provide 4 complete sets of all workpapers supporting the March 11, 2009 rebuttal filing with the Missouri Public Service Commission, for the Kansas City Power & Light Company rate case (two sets for Kansas City and two sets for Jefferson City). b) Please include a copy of all computer files (work sheet, etc.) with formulas intact used on diskette. Where not self-explanatory, please provide an explanation of the formulas used. Also, identify the file name and software used to produce these files. c) Please provide all references for supporting analyses, and/or any other internal documentation utilized to support the Company's calculations. (Case No. ER-2006-0314, Data Request 1; ER-2007-0291, Data Request 1; ER-2009-0089, Data Request 1; Aquila Data Request 1)
Hyneman Chuck	6/17/09	631	1. Please provide a copy of the document titled "Iatan Projects - Accounting for Certain Activities." 2. Please provide a copy of the meeting minutes and other documents provided at or discussed in the 12/14/06 Iatan Joint Owners meeting. 3. Please provide copies of computer disks of all invoices given to the Kansas Corporate Commission regarding their investigation into Iatan 1 and Common Facilities.
Hyneman Chuck	6/17/09	632	1. Please provide a copy of each and every contract or agreement between KCPL and Pegasus-Global Holdings Inc. (Pegasus) and/or Pegasus and another entity working on behalf of KCPL. 2. Please provide a copy of each and every purchase order issued by KCPL to Pegasus and/or by another entity working on behalf of KCPL to Pegasus. 3. Please provide a copy of the Request for Proposals and responsive bids submitted for the work awarded to Pegasus-Global Holdings Inc. 4. Please provide a copy of the papers and articles and lectures on prudence that are listed at pages 16 through 19 of Dr. Nielsen's rebuttal testimony in Case No. ER-2009-0089.
Hyneman Chuck	6/17/09	633	Please provide either a hard copy or an electronic copy of each and every Iatan Risk & Opportunity (R&O) sheet.
Hyneman Chuck	6/17/09	634	1. Does KCPL have a contract or agreement with Kansas City area hotels in which it negotiated a discounted rate for vendors and contractors who travel to Kansas City to conduct business with KCPL? If yes, please provide a copy of the agreement. 2. Does KCPL provide to vendors that will charge lodging accommodations to KCPL a preferred list of approved lodging facilities or a limit on the maximum room rate charge that KCPL will reimburse? If so, please provide these documents.
Hyneman Chuck	6/17/09	0633S	Please provide either a hard copy or an electronic copy of each and every Iatan Risk & Opportunity (R&O) sheet. Supplemental R&O items to be attached.
Hyneman Chuck	6/19/09	635	1. A. Please provide a copy of Ernst & Young's (EY) findings and results of its original initial Iatan construction risk assessment. B. Please provide a separate copy of the Company's Team and executives' updates to this original document. C. Please provide any KCPL responses to this original risk assessment. 2. A. Please provide a copy of any additional Iatan construction risk assessments performed by EY. B. Please provide a separate copy of the Company's Team and executives' updates to any subsequent EY risk assessments. C. Please provide any KCPL responses to any subsequent EY Iatan construction risk assessments.
Hyneman Chuck	6/19/09	636	Please provide a list of all payments to Pegasus Global Holdings either directly or indirectly through another vendor from January 2006 through May 2009. For each payment, please list the invoice number, amount paid, date paid, and the specific balance sheet or income statement accounts charged for the payment.
Hyneman Chuck	6/24/09	637	1. Please provide a copy of each and every contract and/or other agreements with the vendor Strategic Talent Solutions related to either the Iatan 1 or Iatan 2 construction projects. 2. Please provide a copy of each and every purchase order with the vendor Strategic Talent Solutions related to either the Iatan 1 or Iatan 2 construction projects. 3. Please provide a copy of each and every invoice received from the vendor Strategic Talent Solutions related to either the Iatan 1 or Iatan 2 construction projects. 4. Please provide a copy of each and every payment voucher for the vendor Strategic Talent Solutions related to either the Iatan 1 or Iatan 2 construction projects. 5. Please provide a copy of all workproducts, reports, analysis, etc. produced by for vendor Strategic Talent Solutions for KCPL related to either the Iatan 1 or Iatan 2 construction projects. 6. Please describe why KCPL sought the services of vendor Strategic Talent Solutions for the performance of work that was charged to either the Iatan 1 or Iatan 2 construction projects.
Hyneman Chuck	6/25/09	638	Please provide a copy of all video(s) of the Iatan 1 and Iatan II work site in possession and/or video(s) in which KCPL has paid for. This includes all video(s), including video for training, motivation, and productivity purposes.
Hyneman Chuck	6/25/09	639	Please provide any contract, purchase order, invoice, or any other communications/correspondence between EARTHCAM INC. and KCPL in 2006 through the current date.
Hyneman Chuck	6/25/09	640	Please provide a copy of all photographs (electronic version) taken of the Iatan worksite including the photographs and videos taken by FAMBROUGH & ASSOCIATES, INC.
Hyneman Chuck	6/25/09	641	Please provide a copy of all invoices received from, contracts with, and purchase orders issued to CEDAR RIDGE CATERING & BANQUET HALL for services charged to the Iatan construction project.
Hyneman Chuck	7/6/09	642	1. Please provide a copy of each and every contract and/or other agreements with the vendor CABELAS MKTG & BRAND MGT INC or CABELA'S related to either the Iatan 1 or Iatan 2 construction projects. 2. Please provide a copy of each and every purchase order with this vendor(s) related to either the Iatan 1 or Iatan 2 construction projects. 3. Please provide a copy of each and every invoice received from this vendor(s) related to either the Iatan 1 or Iatan 2 construction projects. 4. Please provide a copy of each and every payment voucher for this vendor(s) related to either the Iatan 1 or Iatan 2 construction projects. 5. Please provide a list of all individuals who received a gift card or any other product obtained from this vendor (include name, date received and affiliation with KCPL). 6. Who at KCPL authorized the purchase of these goods from this vendor and authorized the cost of the items purchased to be charged to the Iatan construction projects? 7. Please provide documentation stating the business need for the purchases from this vendor(s) as well as documentation showing that these purchases were controlled to prevent projects? 7. Please provide documentation stating the business need for the purchases from this vendor(s) as well as documentation showing that these purchases were controlled to prevent projects?
Hyneman Chuck	7/6/09	0634S	1. Does KCPL have a contract or agreement with Kansas City area hotels in which it negotiated a discounted rate for vendors and contractors who travel to Kansas City to conduct business with KCPL? If yes, please provide a copy of the agreement. 2. Does KCPL provide to vendors that will charge lodging accommodations to KCPL a preferred list of approved lodging facilities or a limit on the maximum room rate charge that KCPL will reimburse? If so, please provide these documents.

Attachment 2

ER-2009-0089

Requestor	Date Received	Item No.	Question
Majors Keith	7/9/09	643	1. Does KCPL provide car mileage reimbursement for employees who commute to the latan work site (drive from their personal residence to latan roundtrip instead of driving to their normal work location)? If so, is the mileage reimbursement based on the number of miles from the normal work site (e.g. 1201 Walnut in KCMO) to latan or from their residence to latan? 2. From June 2005 through the current date, please provide the following information for each and every KCPL employees who charged mileage to any of the latan construction projects: Employee name, date of trip to latan, number of miles charged, and purpose of the trip.
Majors Keith	7/9/09	644	Please provide a listing and a detailed explanation of all codes used on the latan construction workorders, including resource codes and all other cost codes. How does KCPL identify specific internal charges to the workorder, such as mileage, meals and travel? Please describe how these costs can be identified on the latan construction workorders.
Majors Keith	7/9/09	645	Reference pages 32 and 37 of KCPL's 2008 annual report/proxy statement, please provide the following for all KCPL employees who received a car allowance in 2006 through 2009: name of employee, amount of car allowance received by year, account charged, business purpose of the car allowance. Does KCPL pay these employees for mileage reimbursement requests? If yes, please explain why the employee receives a car allowance and mileage reimbursement.
Hyneman Chuck	7/14/09	634.1	Reference the following: DR 634S response "vendor travel expenses must be reasonable and not excessive, which is considered as part of the Company's invoice-approval process." 1. How does KCPL determine if the travel expenses are reasonable and not excessive? 2. Does KCPL provide any guidance or materials to individuals who approve invoices for payment containing vendor travel expenses? 3. Is there any employee(s) or consultants who assist vendors in preparing travel accommodations charged to latan construction? If so, please provide the names of these employees/consultants. 4. In the invoice approval process, what guidelines are used to determine if a) a food charge is excessive, or b) a lodging charge is excessive, and c) a transportation charge is excessive? Please provide a copy of these guidelines.
Hyneman Chuck	7/14/09	650	Please provide the Staff with access to the latan Joint Owners Sharepoint website.
Hyneman Chuck	7/14/09	651	1. Please provide a copy of each and every invoice submitted by, and payment voucher prepared for MarksADR, LLC., for costs charged to the latan construction projects. 2. Please also provide a copy of the workproduct(s) produced by MarksADR for KCPL, in support of all payments made by KCPL to this vendor. 3. Please provide a copy of all contracts between KCPL and MarksADR, including all change orders and purchase orders issued under the contract. If no contract was entered into, please provide a copy of each and every purchase order issued. 4. Please provide a copy of all correspondence with MarksADR and all documents included in KCPL's "correspondence file" associated with the Marks ADR contract (if no contract, that communications in regards to work performed). 5. Please provide a description of the due diligence actions taken prior to contracting with this vendor, including the names of KCPL employees who recommended this vendor and the reasons why this vendor was selected. 6. Please also provide a description of how the MarksADR, LLC fees charged were determined to be reasonable and competitive in the Old Question: Reference pages 32 and 37 of KCPL's 2008 annual report/proxy statement, please provide the following for all KCPL employees who received a car allowance in 2006 through 2009: name of employee, amount of car allowance received by year, account charged, business purpose of the car allowance. Does KCPL pay these employees for mileage reimbursement requests? If yes, please explain why the employee receives a car allowance and mileage reimbursement. New Question: The list of 25 employees who receive a car allowance are not all NEOs. I understand KCPL has special perks for NEOs, but what about for the non NEOs to whom KCPL provides a car allowance? Also, why do these employees receive a car allowance and mileage reimbursement, which presumably is a reimbursement for expenses that are already paid for through the car allowance? Could you please issue a supplemental DR addressing these points?
Hyneman Chuck	7/15/09	630.1	Reference KCPL response to DR 630.1 as follows" consistent with the Company's Policies and Procedures, the Company uses purchase orders and other mechanisms for tracking expenditures." For the following vendors (listed on item 2 of DR 630 -no contract, no purchase order) Environmental Resources Mgt, Focus Legal KC, Pappas Stainless & Alloy, Sonnenschein Nath & Rosenthal, Spencer Fane, Strategic Talent Solutions, please 1) describe the specific reasons why no contract was negotiated or awarded, 2) provide a copy of KCPL's policy on using contracts and purchase orders and state if not entering into a contract with these vendors is a) in accordance with KCPL policies and b) in accordance with good cost control for construction project management. 3) Without a contract for these vendors, please explain how KCPL controls the costs of the goods and services provided, including hourly rates charged, reasonableness of expenses charged, and quality of work.
Hyneman Chuck	7/16/09	646	Reference: the contract between KCPL and Pullman Power LLC for EPC services for Pollution Control Stack, KCPL Project #41180. 1. Please provide a copy of each and every weekly update progress reports submitted under Article 8.6, Progress Reporting from July 28, 2006 through the most current date. 2. Please provide a copy of each and every report submitted by this contractor under Article 3, paragraph 3.8.1, 3.8.2, 3.8.3, 3.8.4 from July 28, 2006 through the current date.
Majors Keith	7/21/09	642.1	Please provide all additional information requested in DR 642 for vendor BEST BUY and all other gift card vendors related to the projects at latan.Q0642 is 1.Please provide a copy of each and every contract and/or other agreements with the vendor CABELAS MKTG & BRAND MGT INC or CABELA'S related to either the latan 1 or latan 2 construction projects. 2. Please provide a copy of each and every purchase order with this vendor(s) related to either the latan 1 or latan 2 construction projects. 3. Please provide a copy of each and every invoice received from this vendor(s) related to either the latan 1 or latan 2 construction projects 4. Please provide a copy of each and every payment voucher for this vendor(s) related to either the latan 1 or latan 2 construction projects. 5. Please provide a list of all individuals who received a gift card or any other product obtained from this vendor, (include name, date received and affiliation with KCPL). 6. Who at KCPL authorized the purchase of these goods from this vendor and authorized the cost of the items purchased to be charged to the latan construction projects? 7. Please provide
Hyneman Chuck	7/22/09	647	Please provide a copy of each and every invoice submitted by and payment voucher prepared for Focus Legal Kansas City, LLC for costs charged to the latan construction projects. Please also provide a copy of the workproduct(s) produced by this vendor for KCPL in support of all payments made by KCPL to this vendor.
Hyneman Chuck	7/22/09	648	1. Please describe KCPL's Owner Controlled Insurance Program (OCIP) for latan construction work and provide a copy of these policies. 2. What specific types of insurance is provided under this policy? 3. Please provide the name of the contractors and subcontractors who were/are covered by KCPL's policy. 4. Please provide any evidence of contract bid reductions or other cost savings as a result of providing this type of insurance. 5. Did KCPL require each contractor to reduce their bid price by eliminating contractor-obtained insurance in exchange for KCPL provided insurance? 6. Please provide a copy of KCPL's OCIP manual which describes the bid deduct process, claims management and safety requirements. 7. Who is KCPL's OCIP Administrator? 8. Please provide a list, description and amount for all contractor or subcontractor claims submitted to under KCPL's OCIP policies. 9. Does KCPL believe that any cost savings to the project that were realized due to OCIP insurance provided a greater benefit than the incurrence of increased administrative costs and/or increased exposure to risk? 10. Does KCPL's OCIP insurance cover
Hyneman Chuck	7/22/09	649	1. Please provide a list of all contracts for latan construction work that includes or included a dispute resolution/arbitration clause and provide a copy of that clause. 2. Please provide a list of and description of all disputes/arbitrations between KCPL and any contractor or subcontractor who performed work at the latan construction site that were mediated by a third party vendor (mediator). 3. Please provide a description of the dispute, the name of the mediator selected, and the cost of the mediation. 4. For each mediation/arbitration, did KCPL select the mediator or was it mutually agreed to by the parties to the dispute? 5. Please provide a copy of all invoices paid by KCPL for dispute mediation/arbitration services related to the latan construction projects. 6. Please provide a description of all cost controls employed by KCPL in its selection of dispute mediation/arbitration firms. 7. Please provide the name of the KCPL employee who selected each dispute mediation firm, the basis for that selection, and a list of competitive bids that were obtained for these services.

Attachment 2

ER-2009-0089

Requestor	Date Received	Item No.	Question
Hyneman Chuck	7/29/09	666	1. Please provide the explanation justifying Mr Easley being reimbursed twice (expense reports signed 7/9/07 and 8/21/07) for mileage charged to 52-00123 for travel to Iatan 2's groundbreaking ceremony on 6/25/07.2. Please provide the explanation justifying the difference in mileage charged by Mr. Easley (78 miles on expense reports signed 7/9/07 & 8/21/07) and Mr. Downey (84 miles expense reports signed 9/10/07) for a 6/25/07 roundtrip to Iatan for a ground breaking ceremony. Please provide reason Mr Downey and Mr. Easley could not travel together to attend this ceremony.3. Please provide the explanation justifying Mr Easley being reimbursed twice (expense reports signed 8/21/07 and 11/8/07) for mileage charged to 52-00123 and MRG-PLINTOP for travel for Meeting @ Sibley on 8/21/07.4. Referring to Mr. Easley's Expense Report signed 8/21/07, please provide the rationale for charging all mileage expense to project 52-00123 for trips to LaCygne, Wolf Creek, Pinosaks, Montrose, Hawthorn, and Aquila Sibley location.5. Referring to Mr. Easley's Expense Report signed 11/8/07, please provide the rationale for charging for trips to LaCygne, Wolf Creek, Pinosaks, Montrose, Hawthorn, and Aquila Sibley location.5. Referring to Mr. Easley's meeting with Rod Robertson (B&McD) @ Westports First Watch on 10/25/07. If no documents exist related to the business elements of this meeting, please provide a description of the business details addressed at this meeting.2. Referring to Mr. Easley's Expense Report signed 1/9/08, please provide the rationale for charging mileage expense to project 52-00123 for trips to Lake Road, Wolf Creek, LaCygne, and Overland Park Convention Center.3. Referring to Mr. Easley's Expense Report signed 5/20/08, please provide the rationale for charging mileage expense to project 52-00123 for trips to Wolf Creek; The National Golf Club; Big Cedar Lodge, Ridgedale, Missouri; and Jefferson City, Missouri.4. Please provide the explanation justifying Mr Easley's mileage reimbursements (expense report signed 7/10/08 for trip on 5/23/08 being charged entirely to Iatan II instead of Iatan I and other CEP projects.5. Referring to Mr. Easley's Expense Report signed 7/10/08, please provide the rationale for charging mileage expense to Iatan II.
Hyneman Chuck	7/29/09	667	1. Please provide the explanation justifying Mr Downey being reimbursed twice (expense reports signed 9/10/07 and 9/10/07) for mileage charged to 52-00123 for travel to Iatan 2's groundbreaking ceremony on 6/25/07.2. Please provide the explanation justifying Mr Downey being reimbursed twice (expense reports signed 3/9/08 and 4/24/08) for mileage charged to 52-00123 and CORPDKCPL for travel to Iatan on 2/22/08.3. Please provide the explanation justifying Mr Downey being reimbursed twice (expense reports signed 3/9/08 and 4/24/08) for mileage charged to 52-00123 and CORPDKCPL for travel to Iatan on 3/4/08.4. Please provide the explanation justifying Mr Downey being reimbursed (expense report signed 8/18/08) \$68.00 for parking at MCI for the period 5/8/08 through 5/11/08 for the Marks ADR meeting occurring on May 8-9, 2008.5. Please provide the explanation justifying Mr Downey being reimbursed twice (expense reports signed 6/26/08 and 8/18/08) for mileage charged to 52-00123 for travel to Iatan on 5/23/08.6. Please provide the explanation justifying Mr Downey's mileage reimbursements (expense reports signed 8/27/08; 9/1/08; 9/2/08; 9/11/08; 9/12/08; 9/17/08; 9/18/08; 9/30/08; 10/2/08; 10/16/08; 10/22/08; 10/29/08; 10/31/08; 11/05/08; 11/14/08; 11/19/08; 12/3/08; 12/10/08; 1/21/09; 1/28/09; 2/4/09; 2/18/09; 2/25/09; 3/4/09; 3/11/09; 3/18/09; 4/15/09; 4/22/09; 4/29/09; 5/6/09; and 5/20/09)
Hyneman Chuck	7/29/09	668	1. Please provide the explanation justifying Mr Downey being reimbursed twice (expense reports signed 9/10/07 and 9/10/07) for mileage charged to 52-00123 for travel to Iatan 2's groundbreaking ceremony on 6/25/07.2. Please provide the explanation justifying Mr Downey being reimbursed twice (expense reports signed 3/9/08 and 4/24/08) for mileage charged to 52-00123 and CORPDKCPL for travel to Iatan on 2/22/08.3. Please provide the explanation justifying Mr Downey being reimbursed twice (expense reports signed 3/9/08 and 4/24/08) for mileage charged to 52-00123 and CORPDKCPL for travel to Iatan on 3/4/08.4. Please provide the explanation justifying Mr Downey being reimbursed (expense report signed 8/18/08) \$68.00 for parking at MCI for the period 5/8/08 through 5/11/08 for the Marks ADR meeting occurring on May 8-9, 2008.5. Please provide the explanation justifying Mr Downey being reimbursed twice (expense reports signed 6/26/08 and 8/18/08) for mileage charged to 52-00123 for travel to Iatan on 5/23/08.6. Please provide the explanation justifying Mr Downey's mileage reimbursements (expense reports signed 8/27/08; 9/1/08; 9/2/08; 9/11/08; 9/12/08; 9/17/08; 9/18/08; 9/30/08; 10/2/08; 10/16/08; 10/22/08; 10/29/08; 10/31/08; 11/05/08; 11/14/08; 11/19/08; 12/3/08; 12/10/08; 1/21/09; 1/28/09; 2/4/09; 2/18/09; 2/25/09; 3/4/09; 3/11/09; 3/18/09; 4/15/09; 4/22/09; 4/29/09; 5/6/09; and 5/20/09)
Hyneman Chuck	7/29/09	0659S 0660S 0657SA	Please provide a copy of the Alstom correspondence file related to Alstom Iatan 1 environmental and Iatan 2 contracts. Please provide a copy of the Kiewit correspondence file related to Kiewit Iatan 1 environmental and Iatan 2 contracts. Please provide a listing of the KCPL employees who entered the Iatan site on the following days with the time each individual arrived and left the site: 11/3/08; 11/8/08; 11/14/08; 11/17/08; 2/12/08; 2/12/07; 3/8/07; 3/15/07; 3/23/07; 3/28/07; 4/12/07; 4/20/07; 5/18/07; 5/22/07; 5/25/07; 5/18/07; 5/22/07; 6/25/07; 6/21/07; 6/25/07; 7/31/07; 8/3/07; 8/16/07; 8/16/08; 2/12/08; 2/19/08; 2/20/08; 2/21/08; 3/4/08; 3/11/08; 3/14/08; 3/19/08; 3/25/08; 4/3/08; 4/4/08; 4/8/08; 4/11/08; 4/22/08; 4/24/08; 4/25/08; 5/1/08; 5/2/08; 5/5/08; 5/7/08; 5/9/08; 5/13/08; 5/23/08; 5/27/08; 6/18/08; 6/27/08; 7/30/08; 8/18/08; 8/27/08; 9/1/08; 9/2/08; 9/11/08; 9/12/08; 9/17/08; 9/18/08; 9/30/08; 10/2/08; 10/16/08; 10/22/08; 10/29/08; 10/31/08; 11/05/08; 11/14/08; 11/19/08; 12/3/08; 12/10/08; 1/21/09; 1/28/09; 2/4/09; 2/18/09; 2/25/09; 3/4/09; 3/11/09; 3/18/09; 4/15/09; 4/22/09; 4/29/09; 5/6/09; and 5/20/09
Hyneman Chuck	7/29/09	0659S 0660S 0657SA	Please provide a copy of the Alstom correspondence file related to Alstom Iatan 1 environmental and Iatan 2 contracts. Please provide a copy of the Kiewit correspondence file related to Kiewit Iatan 1 environmental and Iatan 2 contracts. Please provide a listing of the KCPL employees who entered the Iatan site on the following days with the time each individual arrived and left the site: 11/3/08; 11/8/08; 11/14/08; 11/17/08; 2/12/08; 2/12/07; 3/8/07; 3/15/07; 3/23/07; 3/28/07; 4/12/07; 4/20/07; 5/18/07; 5/22/07; 5/25/07; 6/25/07; 6/21/07; 6/25/07; 7/31/07; 8/3/07; 8/16/07; 8/16/08; 2/12/08; 2/19/08; 2/20/08; 2/21/08; 3/4/08; 3/11/08; 3/14/08; 3/19/08; 3/25/08; 4/3/08; 4/4/08; 4/8/08; 4/11/08; 4/22/08; 4/24/08; 4/25/08; 5/1/08; 5/2/08; 5/5/08; 5/7/08; 5/9/08; 5/13/08; 5/23/08; 5/27/08; 6/18/08; 6/27/08; 7/30/08; 8/18/08; 8/27/08; 9/1/08; 9/2/08; 9/11/08; 9/12/08; 9/17/08; 9/18/08; 9/30/08; 10/2/08; 10/16/08; 10/22/08; 10/29/08; 10/31/08; 11/05/08; 11/14/08; 11/19/08; 12/3/08; 12/10/08; 1/21/09; 1/28/09; 2/4/09; 2/18/09; 2/25/09; 3/4/09; 3/11/09; 3/18/09; 4/15/09; 4/22/09; 4/29/09; 5/6/09; and 5/20/09
Hyneman Chuck	7/30/09	0676A	Information on the 8/11/08 Medinah Country Club meeting to discuss the Iatan Project and justification for Iatan 1 & 2 charges.Regarding Mr. Downey's 8/11/08 Medinah Country Club meeting to discuss the Iatan Project on Mr. Downey's 9/26/08 Expense Report, please provide the specific issues/agenda of matters to be addressed at this meeting; the names and title of each KCPL employee or KCPL consultant that attended this meeting; the name, title, and entity represented for each non-KCPL employee/consultant that attended this meeting; A listing of the matters discussed, decisions made, agreements reached, issues resolved, action items developed at this meeting; Copies of all documents related to the matters discussed, decisions made, agreements reached, issues resolved, action items developed at this meeting; and Justification for charging costs from this meeting to Iatan I & II 0676A-The Staff has requested that we modify our original response to DR 0676 to include more of the information requested, even though we indicated that this charge was miscoded to Iatan construction. Regarding Mr. Easley's cancelled trip - Alstom Headquarters Orlando -, Florida trip charge (\$283.10) to Iatan II on his 12/29/06 Expense Report please provide: the intended business purpose for this trip; the amount of time in Orlando expected to be needed to conduct business purpose of this trip; the names of each KCPL employee intended to travel on this trip; the names of non-KCPL individuals intended to be involved in the business aspects of this trip; the names of each KCPL employee intended to travel on this trip; the names of each individual that approved travel for this trip; the conditions for cancellation and refund related to the \$282.10 at the time the costs were incurred; the names of each individual that decided to cancel travel for this trip; the reason(s) trip was canceled; date and time of day decision was made to cancel trip; copies of all documentation related to decisions to initiate and approve the trip; copies of all documentation related to the decision to cancel the trip; and justification for charging the cancelled charges to Iatan
Hyneman Chuck	7/31/09	682	1. Are KCPL employees allowed to recover costs for parking in the most expensive lots at MCI? 2. Does KCPL have a policy, procedure, or practice regarding the amount KCPL will reimburse its employees for parking at MCI for business trips? If yes, please provide a copy of any document related to any such policy, procedure, or practice. Please provide the justification for charging Mr. Easley's 11/8/06 mileage for the Iatan 1 Joint Owners Meeting (Expense Report signed 12/29/06) to project 52-00123 Regarding the 7/16/07 Alstom Power & KCP&L Executive Dinner Meeting held at Starker's Restaurant, KCMO, please provide: 1) the business purpose of the meeting; 2) the number of people attending this meeting; 3) the mode of transportation used by KCP&L and Alstom employees to arrive at and leave from the Starker's Restaurant; 4) the cost of transportation charged to KCPL for this meeting and the account charged 5) the agenda for this meeting; 6) the minutes related to this meeting; 7) all documents provided to the meeting participants prior to the meeting; 8) the meeting attendance sheet; 9) the names and titles of all KCPL employees that attended this meeting; 10) the names and titles of all non-KCPL employees that attended this meeting; 11) Copies of all documents related to the matters discussed, decisions made, agreements reached, issues resolved, action items developed at this meeting; 12) The time the meeting started; and 13) The location in the restaurant where the meeting was held.
Hyneman Chuck	7/31/09	683	1. Are KCPL employees allowed to recover costs for parking in the most expensive lots at MCI? 2. Does KCPL have a policy, procedure, or practice regarding the amount KCPL will reimburse its employees for parking at MCI for business trips? If yes, please provide a copy of any document related to any such policy, procedure, or practice. Please provide the justification for charging Mr. Easley's 11/8/06 mileage for the Iatan 1 Joint Owners Meeting (Expense Report signed 12/29/06) to project 52-00123 Regarding the 7/16/07 Alstom Power & KCP&L Executive Dinner Meeting held at Starker's Restaurant, KCMO, please provide: 1) the business purpose of the meeting; 2) the number of people attending this meeting; 3) the mode of transportation used by KCP&L and Alstom employees to arrive at and leave from the Starker's Restaurant; 4) the cost of transportation charged to KCPL for this meeting and the account charged 5) the agenda for this meeting; 6) the minutes related to this meeting; 7) all documents provided to the meeting participants prior to the meeting; 8) the meeting attendance sheet; 9) the names and titles of all KCPL employees that attended this meeting; 10) the names and titles of all non-KCPL employees that attended this meeting; 11) Copies of all documents related to the matters discussed, decisions made, agreements reached, issues resolved, action items developed at this meeting; 12) The time the meeting started; and 13) The location in the restaurant where the meeting was held.
Hyneman Chuck	7/31/09	684	1. Are KCPL employees allowed to recover costs for parking in the most expensive lots at MCI? 2. Does KCPL have a policy, procedure, or practice regarding the amount KCPL will reimburse its employees for parking at MCI for business trips? If yes, please provide a copy of any document related to any such policy, procedure, or practice. Please provide the justification for charging Mr. Easley's 11/8/06 mileage for the Iatan 1 Joint Owners Meeting (Expense Report signed 12/29/06) to project 52-00123 Regarding the 7/16/07 Alstom Power & KCP&L Executive Dinner Meeting held at Starker's Restaurant, KCMO, please provide: 1) the business purpose of the meeting; 2) the number of people attending this meeting; 3) the mode of transportation used by KCP&L and Alstom employees to arrive at and leave from the Starker's Restaurant; 4) the cost of transportation charged to KCPL for this meeting and the account charged 5) the agenda for this meeting; 6) the minutes related to this meeting; 7) all documents provided to the meeting participants prior to the meeting; 8) the meeting attendance sheet; 9) the names and titles of all KCPL employees that attended this meeting; 10) the names and titles of all non-KCPL employees that attended this meeting; 11) Copies of all documents related to the matters discussed, decisions made, agreements reached, issues resolved, action items developed at this meeting; 12) The time the meeting started; and 13) The location in the restaurant where the meeting was held.
Hyneman Chuck	7/31/09	686	1. Are KCPL employees allowed to recover costs for parking in the most expensive lots at MCI? 2. Does KCPL have a policy, procedure, or practice regarding the amount KCPL will reimburse its employees for parking at MCI for business trips? If yes, please provide a copy of any document related to any such policy, procedure, or practice. Please provide the justification for charging Mr. Easley's 11/8/06 mileage for the Iatan 1 Joint Owners Meeting (Expense Report signed 12/29/06) to project 52-00123 Regarding the 7/16/07 Alstom Power & KCP&L Executive Dinner Meeting held at Starker's Restaurant, KCMO, please provide: 1) the business purpose of the meeting; 2) the number of people attending this meeting; 3) the mode of transportation used by KCP&L and Alstom employees to arrive at and leave from the Starker's Restaurant; 4) the cost of transportation charged to KCPL for this meeting and the account charged 5) the agenda for this meeting; 6) the minutes related to this meeting; 7) all documents provided to the meeting participants prior to the meeting; 8) the meeting attendance sheet; 9) the names and titles of all KCPL employees that attended this meeting; 10) the names and titles of all non-KCPL employees that attended this meeting; 11) Copies of all documents related to the matters discussed, decisions made, agreements reached, issues resolved, action items developed at this meeting; 12) The time the meeting started; and 13) The location in the restaurant where the meeting was held.
Hyneman Chuck	7/31/09	687	Regarding the \$2,117.73 reimbursement for the 7/16/07 Alstom Power & KCP&L Executive Dinner Meeting on Mr. Easley's 8/21/07 Expense Report, please provide the rationale for this cost not being charged to the Iatan project. Did this expenditure represent a returning of hospitality Alstom provided KCPL executives during the 2/19-20/07 Alstom Power Executive trip to Knoxville, Tennessee.

Attachment 2

ER-2009-00889

Requestor	Date Received	Item No.	Question
Hyneman Chuck	7/31/09	688	Regarding the \$2,117,73 reimbursement for the Alstom Power & KCP&L Executive Dinner Meeting on Mr. Easley's 8/21/07 Expense Report, please provide all documentation showing the specific details of the costs that KCP&L was being requested to and did reimburse regarding this expenditure
Hyneman Chuck	8/3/09	630.2	1. Reference KCP&L Policy E100, Procurement, page 3, Competitive Bidding. Please provide all documents in the Purchasing Department Manual related to costs charged by Strategic Talent Solutions (STS) to KCP&L that were capitalized for the latan construction projects. 2. Please also provide a copy of all documented joint decisions made on whether or not to perform a competitive bid for the Services STS performed for the latan construction projects. 3. Please list the specific exception that was used to waive the competitive bid requirements for work performed by STS and a description of why a deviation for the competitive bid procedures was necessary. 4. Please provide a copy of each and every document provided to STS from KCP&L or KCP&L from STS for work related to the latan construction projects. This includes all documents relied upon by STS in the formulation of its Report to KCP&L, including interview notes, completed questionnaires, individual feedback sessions provided to members of the construction project by STS and KCP&L, STS individual team reports, and notes of meetings in which STS 1. Please provide a copy of policy KCP&L- E200 and E201, and the ProCard procedures manual. 2. Please provide a copy of the current Related Party List maintained by the Corporate Secretary's Office, and all changes that were made since May 2005 to the list, with the date of each change reflected. 3. With respect to the latan 1 and latan 2 construction projects, were any transactions entered into with vendors that were on the Related Party List? If yes, please provide a listing of all transactions and a copy of all approvals given for each this transaction.
Hyneman Chuck	8/3/09	630.3	1. Please provide a list of all detailed invoices and voucher payments packages for costs charged to the latan 1 or latan 2 construction projects for Sommenschein Nath & Rosenthal, LLP. 2. Please also provide a detailed description of the work performed by this firm for KCP&L that was charged to the latan construction projects.
Hyneman Chuck	8/3/09	624.2	Reference KCP&L's response to Staff DR 624 1. Please provide the name of the individual(s) who were involved in the decision to purchase these GPP assets and capitalize them to the latan projects. 2. Please identify the individual or individuals who exercised final authority on this decision to purchase these assets. 3. Please explain the reasons why these costs were capitalized to the latan projects, including and explanation as to why the incurrence of these costs were necessary to construct the latan 1 AQCS system and the latan 2 generating unit. 4. Please identify the individuals who were involved in making the decision to capitalize these costs in the manner described, and who exercised final authority on that decision. 5. Please provide copies of all documentation related to KCP&L's decision to purchase the GPP assets. 6. Please provide copies of any documentation related to the evaluation of the market value of the GPP assets at the time of this transaction.
Hyneman Chuck	8/3/09	0689A	1. Please provide a copy of policy KCP&L- E200 and E201, and the ProCard procedures manual. 2. Please provide a copy of the current Related Party List maintained by the Corporate Secretary's Office, and all changes that were made since May 2005 to the list, with the date of each change reflected. 3. With respect to the latan 1 and latan 2 construction projects, were any transactions entered into with vendors that were on the Related Party List? If yes, please provide a listing of all transactions and a copy of all approvals given for each this transaction. 0689A: Please provide actual related party listing; the original response provided a redacted list.
Hyneman Chuck	8/10/09	690	Please provide a copy of each and every document and/or correspondence between KCP&L and the Kansas Corporation Commission and/or the Citizens' Utility Rate Board (CURB) related to any discovery disputes, data request objections or similar matters relating to the latan 1, latan 2 and common plant construction audits performed by these entities.
Hyneman Chuck	8/12/09	691	1. Please provide a copy of each and every formal and informal policy on the sufficiency of documentation supporting meals and other charges on employee expense reports from June 2005 - the present day. 2. Please describe KCP&L's policy on the specific type of information that is required to be included in receipts obtained from restaurants in support of meal and other charges. 3. Please identify whether GPE's Code of Conduct regarding Substance Abuse applies to business meal activity where the employee seeks reimbursement for the cost of the meal. 4. Please provide any GPE/KCP&L policy or practice related to the amount of alcohol, if any, that KCP&L employees can consume and remain eligible for reimbursement for local business meals costs. 5. Please provide copies of any documentation or reference material provided to KCP&L employees that approved local meals on employee expense reports to determine whether the amount is reasonable.
Hyneman Chuck	8/12/09	692	1. Please provide a copy of the economic justification and other related studies and the specific data relied upon by KCP&L's in its lease versus buy decision as it relates to the unit trains for the latan 2 construction project. Please describe all reasons which formed the basis of KCP&L's decision. 2. Please provide a copy of all data and/or analyses relied upon by KCP&L in any decision to change its cost estimates for the latan 2 coal supply.
Majors Keith	8/12/09	693	Please provide a copy of the original contract (s) and/or agreement (s) and each and every change thereto between KCP&L and all partners to the latan environmental upgrade projects.
Majors Keith	8/13/09	623.1	Please provide electronic files, with formulas intact, of the monthly KCP&L AFUDC calculations (Report 73) for the period July 2005 through present as used for both latan 1 and for latan 2.
Hyneman Chuck	8/14/09	474.1	1. Please provide a copy of the construction workorders for latan 1, latan 2, and common plant as of May 31, 2009. Please update this request with workorders on a monthly basis. In the workorders please include the amounts transferred to account 101, plant in service. 2. Please provide the journal entry and description of each journal entries made to KCP&L's financial records to reflect costs charged to or removed from the latan 1, latan 2 and Common Plant workorders. Please update these journal entries on a monthly basis.
Hyneman Chuck	8/14/09	694	Please arrange a meeting with the appropriate KCP&L representatives to discuss the methodology used by KCP&L, and other potential methodologies, to allocate indirect costs of the latan 1 and 2 projects to the latan Common Plant workorder.
Hyneman Chuck	8/14/09	622.1	Please provide for latan 2, the same data that was provided to the Staff for latan 1 on or about August 11, 2009. The data for latan 2 should be cost data at the end of May 31, 2009
Hyneman Chuck	8/17/09	695	Is Mr. Chesser an officer of KCP&L or GMO? If yes, when did Mr. Chesser initially become an officer of KCP&L or GMO? Please provide copies of all documentation identifying the need for Mr. Chesser to become a KCP&L or GMO officer, delineating the difference in job duties and responsibilities from those of Mr. Downey, announcing Mr. Chesser's new position(s); and supporting/approving the decision to make Mr. Chesser an Officer of KCP&L or GMO.
Hyneman Chuck	8/17/09	696	Please provide copies of each and every document that describes Mr. Downey's job duties, responsibilities, and level of authority for the period of June 30, 2005 through July 31, 2009
Hyneman Chuck	8/17/09	697	Please provide copies of each and every document that specifies the level of authority for KCP&L regarding expenditures that require Board approval versus the amounts that can be approved by each KCP&L officer for the period of June 30, 2005 through July 31, 2009
Hyneman Chuck	8/17/09	698	Please provide a copy of David Price's resignation letter.
Hyneman Chuck	8/17/09	699	Please provide a copy of the Alstom Management Plan referenced on page 6 of latan's 7/18/07 Assessment of Key Projects presentation by D. Price.
Hyneman Chuck	8/17/09	700	Please provide a copy of Risk Mitigation Analysis to support Single Entity BOP Contracting Approach Lora Cheatum Ex 3, p 9.
Hyneman Chuck	8/17/09	701	Was a Change Order Board formed for review and approval of latan 1 AQCS and latan 2 change orders? If yes, please provide copies of each and every document regarding the function and goals of the Change Order Board and its members.

Attachment 2

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Requestor	Date Received	Item No.	Question
Hyneman Chuck	8/17/09	702	Did a latan third party vendor(s) offer tickets to KCPL employees to attend the "Bodies Revealed" exhibit at Union Station? If yes, were these tickets offered to all KCPL employees? If the tickets were not offered to all KCPL employees, please provide the names and titles of the KCPL employees who were offered "Bodies Revealed" tickets.
Hyneman Chuck	8/17/09	703	Please identify the April 30, 2009 in service status for each of the assets shown on the five (5) page Asset Valuation Summary contained in Mr. Jones' March 6, 2009 Common Systems Asset Valuation binder.
Hyneman Chuck	8/17/09	704	Please provide a copy of the KCPL and GMD Property Accounting Manual that applies to the assets related to the latan 1 AQCS addition and latan 2. If not contained in this material, please provide the documentation that defines the unit of property classification for each of the assets shown on the five (5) page Asset Valuation Summary contained in Mr. Jones' March 6, 2009 Common Systems Asset Valuation binder.
Hyneman Chuck	8/17/09	705	1. Please identify the B&MCD individuals who worked on the development of the initial Definitive Estimate/Control Budget Estimate. For each individual, please provide each and every document that KCPL reviewed to determine their experience with the development of a DE/CBE. 2. Please arrange a meeting to discuss the specific approval process related to B&MCD invoices charged to the latan 1 and 2 projects for the period June 2005 through July 2009 including the identification of the hours charged by employee to the actual work actually performed by the employee on the latan 1 and 2 projects.
Hyneman Chuck	8/17/09	706	Please provide copies of the Constructability Review Meeting Minutes for the latan project. (See 10/6/06 latan 2 weekly Status Report)
Hyneman Chuck	8/17/09	707	Please provide copies of each and every receipt and/or documentation supporting the 3/22/07 charge of \$737.15 for travel expenses (except meals) and the 3/22/07 charge of \$226.63 for meals on pages 37 and 38 respectively on voucher 837902.
Hyneman Chuck	8/17/09	708	Please provide copies of Mr. Giles' and Mr. Riggins' expense reports for the period June 2005 through July 2009. Please provide copies of all receipts in KCPL's possession supporting each and every reimbursement for expenditures charged or related to latan 1 and latan 2 construction projects during this time frame.
Hyneman Chuck	8/17/09	709	Did GMD maintain the same level of audit presence and oversight of the construction of the latan 1 AQCS and latan 2 after GPE acquired Aquila? If no, please provide copies of each and every document related to the decision to change the level of GMD audit presence and oversight of latan 1 AQCS and latan 2 construction.
Hyneman Chuck	8/17/09	710	Please provide copies of each and every Schiff-Hardin Report provided to KCPL since December 18, 2007.
Hyneman Chuck	8/17/09	711	Please provide copies of all KCPL Board of Directors' meeting minutes and documentation provided to Board members related to the latan 1 AQCS and latan 2 construction projects for the period of June 2007 through July 2009.
Hyneman Chuck	8/17/09	712	Please identify the eligibility requirements to receive and be authorized to use a KCPL T&E Card. Please provide copies of each and every document related to defining the responsibilities and obligations of the individual and KCPL relative to an outstanding T&E card. Does KCPL ever pay the charges on a KCPL T&E card before the employee has submitted and processed an expense report related to these charges?
Hyneman Chuck	8/17/09	713	1. Please provide a copy of 4/3-4/08 MCI Parking receipt supporting the \$36.00 cost claimed on Mr. Downey's 6-26-08 Expense Report2. Please provide the justification for Mr. Downey being reimbursed a greater amount for airfare (\$677.20 on 6-4-07 Expense Report) to Knoxville, Tennessee for Alstrom Power Executive Trip on 2-19-20/07 than Mr. Easley \$274.60 (on 3/13/07 Expense Report) airfare fee for the same trip.3. Regarding Mr. Downey's 2/4/08 \$51.10 charge to latan II due to a reschedule of his 2/8/08 departure to a later time than 3:50PM as reflected on his 4-24-08 Expense Report, please provide a copy of 1) the information of the flight being rescheduled, 2) the receipt for payment of initial flight and the rescheduling fee, and 3) the business purpose of the initial flight being rescheduled.4. Please provide the justification for 8/17/08 WHD Medinah meeting related transportation charge to latan on Mr. Downey's 9/26/08 Expense Report while showing no time work on latan for the pay period ending 8/15/08 (DR 388 & 324).
Hyneman Chuck	8/17/09	714	Please provide pictures of the current construction status of the \$1.48M Railroad Bridge listed as a component of the Rail Road common facility. Please describe the status of this construction, the total cost incurred as of 5/31/09 and the total estimated cost of this construction.
Hyneman Chuck	8/17/09	715	Please arrange for a meeting to discuss the current status of the May 2008 crane incident and the JLG incident. Please be prepared to discuss the current legal status of the incidents, current and future plans for claims and/or litigation, and KCPL intention as to amounts charged to the construction projects.
Hyneman Chuck	8/17/09	0646S	1. DR 646 page 3 says the monthly report number 16 for January 2008 is not available. Did KCPL lose this report or why is it not available? If KCPL lost it, could KCPL contact Pullman and ask them for their copy of the report? 2. On this DR did Pullman not submit monthly progress reports after March 2008? I read the March report and work was still continuing, why would they not be required to submit additional and a final report?
Hyneman Chuck	8/17/09	0710S	Please provide copies of each and every Schiff-Hardin Report provided to KCPL since December 18, 2007.
Hyneman Chuck	8/17/09	0705I	A meeting to discuss the Burns & McDonnell invoice review process will be held on September 23, 2009. All documents to be provided in this data request.
Hyneman Chuck	8/19/09	716	1. For all charges from KCPL to latan 1 AQCS since its inception through May 31, 2009, please run PeopleSoft queries and provide reports showing the following information: A. The total dollar amount charged to the projects by KCPL resource code and description. B. All costs charged to the project by resource code and by department number and department name. C. All costs charged to the projects by resource code and by department number by month. D. All employee bonuses charged to the projects by month. E. All incentive compensation charged to the projects by month. Note: For all resource codes that do not have a description of the types of costs charged, please provide a separate description of the types of costs included in the resource code charges. 2. Please provide a current list of all KCPL department numbers, department name and description, and names of current employees assigned. 3. Please provide the dollar amount of AFUDC charged to the latan 1 AQCS projects by project by month through the current month for KCPL.
Hyneman Chuck	8/19/09	717	Reference the FERC USOA 18CFR Chapter 1 part 101 Electric Plant Instructions, 4. Overhead Construction Costs. Paragraph C "For Major utilities, the records supporting the entries for overhead construction costs shall be so kept as to show the total amount of each overhead for each year, the nature and amount of each overhead expenditure charged to each construction work order and to each electric plant account, and the bases of distribution of such costs." Please provide these records for the latan 1 work order, latan Common Plant work order, and the latan 2 work order since the creation of the work orders until the work orders were closed to plant in service.
Hyneman Chuck	8/19/09	718	1. Please provide a copy of each and every invoice submitted by, and payment voucher prepared for Cushman & Associates for costs charged to the latan 1 and Common Plant construction projects and include documents that show the specific project numbers where the invoiced costs were booked 2. Please also provide a copy of the workproduct(s) produced by Cushman & Associates for KCPL, in support of all payments made by KCPL to this vendor. 3. Please provide a copy of all contracts between KCPL and Cushman & Associates including all change orders and purchase orders issued under the contract. If no contract was entered into, please provide a copy of each and every purchase order issued. 4. Please provide a copy of all correspondence with Cushman & Associates and all documents included in KCPL's "correspondence file" associated with the Cushman & Associates contract (if no contract, that communications in regards to work performed). 5. Please provide a description of the vendor selection due diligence actions taken prior to contracting with this vendor, including the names of KCPL employees who

Attachment 2

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Requestor	Date Received	Item No.	Question
Hyneman Chuck	8/20/09	0630.2A	1. Reference KCPL Policy E100, Procurement, page 3, Competitive Bidding. Please provide all documents in the Purchasing Department Manual related to costs charged by Strategic Talent Solutions (STS) to KCPL that were capitalized to the latan construction projects. 2. Please also provide a copy of all documented joint decisions made on whether or not to perform a competitive bid for the Services STS performed for the latan construction projects. 3. Please list the specific exception that was used to waive the competitive bid requirements for work performed by STS and a description of why a deviation for the competitive bid procedures was necessary. 4. Please provide a copy of each and every document provided to STS from KCPL or to KCPL from STS for work related to the latan construction projects. This includes all documents relied upon by STS in the formulation of its Report to KCPL, including interview notes, completed questionnaires, individual feedback sessions provided to members of the construction project by STS and KCPL, STS individual team reports, and notes of meetings in which STS 1. Provide all support for the use of 12.50% as the common equity cost rate used in calculating AFUDC prior to 1/1/07.
Majors Keith	8/20/09	719	Reference GPE 10-Q, August 05, 2009, page 62, Advanced Coal Credit arbitration/litigation. 1. Please identify where all costs of this arbitration/litigation have been charged, including accounts, resource codes, and amounts. 2. Please provide a copy of each and every invoice for work related to this issue. 3. Please identify each and every KCPL employee who have worked/are working on this issue. 4. Please identify each and every vendor hired by KCPL to work on this issue.
Hyneman Chuck	8/20/09	720	Please provide for the common plant workorder, the same data that was provided to the Staff for latan 1 under this data request on or about August 11, 2009. The data for the common plant work order should be cost data at the end of May 31, 2009
Hyneman Chuck	8/21/09	622.2	With respect to the latan 1 high level turbine vibrations during startup incident, please provide the following: 1. Current updated description of the cause of the incident. 2. Description of each and every claim by KCPL to an outside vendor/insurance company or claims by any outside vendor or other entity to KCPL. 3. Total costs of the incident and where the costs were booked. 4. Number and name of the projects where the costs were charged. 5. Number of days the incident delayed latan 1 AQCS project completion. 6. Date and time incident occurred and date and time the unit was brought back on line from a successful startup.
Hyneman Chuck	8/24/09	721	1. Please provide in Microsoft Excel the raw data necessary for the creation of pivot tables that show all costs charged to the latan 1 work order (prior to allocation to common plant) in total. 2. Please provide in Microsoft Excel the raw data necessary for the creation of pivot tables that show all costs charged to the latan 1 work order (prior to allocation to common plant) by month by CEP Activity ID. 3. Please provide in Microsoft Excel the raw data necessary for the creation of pivot tables that show all costs charged to the latan 2 work order (prior to allocation to common plant) at May 31, 2009 by CEP Activity ID in total. 4. Please provide in Microsoft Excel the raw data necessary for the creation of pivot tables that show all costs charged to the latan 2 work order (prior to allocation to common plant) by month by CEP Activity ID. 5. Please provide in Microsoft Excel the raw data necessary for the creation of pivot tables that show all costs charged to the latan Common Plant work order at May 31, 2009 by CEP Activity ID in total. 6. Please provide in Microsoft Excel the raw data necessary for the creation of pivot tables that show all costs charged to the latan Common Plant work order at May 31, 2009 by CEP Activity ID in total. 7. Please provide in Microsoft Excel the raw data necessary for the creation of pivot tables that show all costs charged to the latan Common Plant work order at May 31, 2009 by CEP Activity ID in total. 8. Please provide in Microsoft Excel the raw data necessary for the creation of pivot tables that show all costs charged to the latan Common Plant work order at May 31, 2009 by CEP Activity ID in total. 9. 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Please provide in Microsoft Excel the raw data necessary for the creation of pivot tables that show all costs charged to the latan Common Plant work order at May 31, 2009 by CEP Activity ID in total. 94. Please provide in Microsoft Excel the raw data necessary for the creation of pivot tables that show all costs charged to the latan Common Plant work order at May 31, 2009 by CEP Activity ID in total. 95. Please provide in Microsoft Excel the raw data necessary for the creation of pivot tables that show all costs charged to the latan Common Plant work order at May 31, 2009 by CEP Activity ID in total. 96. Please provide in Microsoft Excel the raw data necessary for the creation of pivot tables that show all costs charged to the latan Common Plant work order at May 31, 2009 by CEP Activity ID in total. 97. Please provide in Microsoft Excel the raw data necessary for the creation of pivot tables that show all costs charged to the latan Common Plant work order at May 31, 2009 by CEP Activity ID in total. 98. Please provide in Microsoft Excel the raw data necessary for the creation of pivot tables that show all costs charged to the latan Common Plant work order at May 31, 2009 by CEP Activity ID in total. 99. Please provide in Microsoft Excel the raw data necessary for the creation of pivot tables that show all costs charged to the latan Common Plant work order at May 31, 2009 by CEP Activity ID in total. 100. Please provide in Microsoft Excel the raw data necessary for the creation of pivot tables that show all costs charged to the latan Common Plant work order at May 31, 2009 by CEP Activity ID in total.
Hyneman Chuck	8/25/09	722	Reference KCPL's response to DR 622. 1. Please describe what is meant by the term "Chinese sourced valves" and types of costs associated with this item. Please provide a report for all costs charged to projects 05-00053 and 05-00054 by month, by CEP Activity ID, related to this item. If the costs related to "Chinese sourced valves" were charged to other projects, please provide a report for all costs charged to these other projects by month and by CEP Activity ID. 2. Please provide a report showing all charges to Project ID 51-06531 Activity ID CEP00X021 by month, by vendor, including KCPL indirect charges as a vendor. 3. Please describe what is meant by the term "Turbine Storage issue" and types of costs associated with this item. Please provide a report for all costs charged to projects 52-00123 by CEP Activity ID CEP00X031 by month. If the costs related to "Turbine Storage issue" were charged to other projects, please provide a report for all costs charged to these other projects by month, by CEP Activity ID. 4. Reference Archibald email sent April 6, 2007 3:28 PM to Denise Shumaker. Please identify all charges that were originally made to the account of the Brent Davis (Unit 1 Project Director), Terry Foster (Project Controls Manager), Mike Ballard (Construction Manager), Denise Schumaker (Risk/Compliance Manager) Hugh Miller (Commissioning/Start-Up Manager), Steve Jones (Supply Chain Manager), and Mike Hermesen (Safety Manager) expense reports for the period June, 2005 through June 2009 with copies of all receipts showing the details for any reimbursement charged to latan 1 and latan 2 or related to latan activities.
Hyneman Chuck	8/26/09	0656S	Please provide copies of all of the Brent Davis (Unit 1 Project Director), Terry Foster (Project Controls Manager), Mike Ballard (Construction Manager), Denise Schumaker (Risk/Compliance Manager) Hugh Miller (Commissioning/Start-Up Manager), Steve Jones (Supply Chain Manager), and Mike Hermesen (Safety Manager) expense reports for the period June, 2005 through June 2009 with copies of all receipts showing the details for any reimbursement charged to latan 1 and latan 2 or related to latan activities.
Hyneman Chuck	8/26/09	0656S2	Please provide copies of all of the Brent Davis (Unit 1 Project Director), Terry Foster (Project Controls Manager), Mike Ballard (Construction Manager), Denise Schumaker (Risk/Compliance Manager) Hugh Miller (Commissioning/Start-Up Manager), Steve Jones (Supply Chain Manager), and Mike Hermesen (Safety Manager) expense reports for the period June, 2005 through June 2009 with copies of all receipts showing the details for any reimbursement charged to latan 1 and latan 2 or related to latan activities.
Hyneman Chuck	8/26/09	0656S3	Please provide copies of all of the Brent Davis (Unit 1 Project Director), Terry Foster (Project Controls Manager), Mike Ballard (Construction Manager), Denise Schumaker (Risk/Compliance Manager) Hugh Miller (Commissioning/Start-Up Manager), Steve Jones (Supply Chain Manager), and Mike Hermesen (Safety Manager) expense reports for the period June, 2005 through June 2009 with copies of all receipts showing the details for any reimbursement charged to latan 1 and latan 2 or related to latan activities.
Hyneman Chuck	8/28/09	622.3	A file titled "Committed POs 05-31-09 Locked to JO.xls" was included on the DVD provided as the response to DR 622S, the update for DR 622 for latan 1. The data on lines 588 and 589 of the submitted file showed \$18.6M under the heading Misc Actuals and \$1.036M to Misc Project Development. If the amounts on these two lines are vendor related, allocate these 2 amounts to vendors so that there can be a project cost amount by vendor with KCPL being a vendor for its indirect charges. If not vendor-related, explain what the costs represent in as much detail as possible.
Hyneman Chuck	8/30/09	669	Regarding the September 7 - September 9, 2007, Alstrom Power Industrial Seminar; please provide: 1) A listing of all KCPL employees invited to this seminar; 2) A listing of all prior Alstrom Power Industrial Seminar invitations received by KCPL employees; 3) A listing of all KCPL employees that attended this seminar; 4) A listing of all spouses or guests that attended this seminar with the KCPL employees identified in item 3; 5) A copy of all documentation inviting KCPL and its employees to the September 7 - September 9, 2007, Alstrom Power Industrial Seminar; 6) A copy of all documentation related to or describing the nature, content, schedule, and agenda of activities related to this seminar; 7) A copy of all documentation describing or verifying the business purpose of this seminar relative to KCPL's business interests; 8) A listing of all expenditures paid or amenities provided (e.g. lodging, meals, entertainment) by Alstrom for the benefit of each KCPL employee and their spouse/guests that attended this seminar; and 9) Justification for his expenditure not being charged to the latan project.
Hyneman Chuck	8/30/09	670	Please arrange a meeting to discuss the relationship of "ALL ABOUT Travel" and KCP&L regarding employees, transactions, business relationship, co-location, and accounting for transactions between the Companies..
Hyneman Chuck	8/30/09	671	Does GPE's Code of Ethical Business Conduct re: Cooperation with Investigations apply with the MPSC's Staff construction audits of latan 1 & 2, Sibley 3, and Jeffrey 1-3? If no, please identify the corporate policy that does apply to these audits. If yes, please identify the individual(s) responsible for KCP&L's compliance with its Code of Conduct relative to cooperation with investigations for the MPSC audit of latan 1 & 2.
Hyneman Chuck	8/30/09	672	1. Please identify the individual(s) who made the decision to engage Mr. Tom Maiman as a consultant to the latan project. 2. Please provide copies of all documents that KCPL reviewed regarding Tom Maiman's prior experience relative to the latan construction projects. 3. Please specify the specific experience possessed by Mr. Maiman that KCPL determined it needed for the latan construction projects. 4. Had Mr. Maiman worked on Schiff Hardin projects prior to the KCPL CEP engagement? If yes, please identify the projects that Mr. Maiman had provided prior consulting assistance to Schiff Hardin.
Hyneman Chuck	8/30/09	673	Please provide for review all David Price e-mails either received or sent while in the employ of KCPL.
Hyneman Chuck	8/30/09	674	Please provide a copy of the Tom Chiles "Lessons Learned" document noted in the 11/16/06 Plan of the Day meeting minutes.

Attachment 2

ER-2009-0089

Requestor	Date Received	Item No.	Question
Hyneman Chuck	8/30/09	675	Please identify the KCPL employees and KCPL consultants who had personal experience with Alstom prior to the awarding Alstom the laten EPC contracts. Information on the 8/11/08 Medinah Country Club meeting to discuss the laten Project and justification for laten 1 & 2 charges. Regarding Mr. Downey's 8/11/08 Medinah Country Club meeting to discuss the laten Project on Mr. Downey's 9/26/08 Expense Report, please provide: the specific issues/agenda of matters to be addressed at this meeting; the names and title of each KCPL employee or KCPL consultant that attended this meeting; the name, title, and entity represented for each non-KCPL employee/consultant that attended this meeting; a listing of the matters discussed, decisions made, agreements reached, issues resolved, action items developed at this meeting; Copies of all documents related to the matters discussed, decisions made, agreements reached, issues resolved, action items developed at this meeting; and justification for charging costs from this meeting to laten I & II
Hyneman Chuck	8/30/09	676	Information re: 4/3-4/08 Chicago meeting w/ Charles Whitney (Duane Morris, LLP) re: laten II construction issues Regarding Mr. Downey's 4/3/08/4/08 Chicago meeting w/ Charles Whitney (Duane Morris, LLP) re: laten II construction issues on his 6-26-08 Expense Report; please provide: the specific issues/agenda of matters to be addressed at this meeting; the names of each KCPL employee or KCPL consultant that attended this meeting; the names of non-KCPL individuals that attended this meeting; the relationship, if any, between this meeting and the material provided in response to Data Request Number 398; the explanation why no invoices for work related to this meeting was provided in Data Request Number 398, item 2; names of each individual that approved travel for this trip; Copies of all documents related to the matters discussed, decisions made, agreements reached, issues resolved, action items developed at this meeting; and justification for the charging of costs related to this meeting to laten II
Hyneman Chuck	8/30/09	677	Regarding Mr. Downey's 6/5/08 cancelled Hotel @ Bethesda MD charge of (\$743.54) to laten II on his 9/11/08 Expense Report please provide: 1) the specific need or problem @ laten to be address during this trip; date the decision was made by KCPL to attend this meeting on June 5-6, 2008; date the commitment was made to the hotel for use of its facilities; the cancellation conditions related to the commitment made to the hotel; the names of each individual that decided to cancel travel for this trip; the reason(s) trip was canceled; date and time of day decision was made to cancel trip; justification for charging the cancelled charges to laten II
Hyneman Chuck	8/30/09	679	Please identify any gifts, meals, services, or entertainment provided to each KCPL employee or consultant that attended the 2/19-20/07 Alstom Power Executive meeting in Knoxville, Tennessee. Please provide the value of each such gift, meal, service, or entertainment provided.
Hyneman Chuck	8/30/09	680	10/2/07 Sargent & Lundy Mgt. Visit/Presentation documents and relationship to laten II please provide a copy of all documents related to the 10/2/07 Sargent and Lundy visit/presentation at the KC Club. Please identify the justification for the \$210.38 charge related to this visit/presentation on Mr. Downey's 1-31-08 Expense Report to laten II.
Hyneman Chuck	8/30/09	681	Difference in trans costs Alstom Power Exec trip and MCI Parking and justification for more than \$36 parking @ MCI for two day business trip 1. Please provide the explanation justifying Mr. Downey being reimbursed (expense report signed 6/4/07) \$90.00 for parking at MCI for the period 2/19/07 through 2/20/07 for the Alstom Executive trip to Knoxville, Tennessee. 2. Please provide the explanation justifying Mr. Downey (Expense Report signed 6-4-07) and Mr. Easley (Expense Report signed 3-13-07) not sharing local transportation while attending the 2/19/07-20/07 Alstom Power Executive trip to Knoxville, Tennessee. Please provide the justification for Mr. Easley's car rental for local transportation of \$113.37 (Expense Report signed 3-13-07) while attending the 2/19/07-20/07 Alstom Power Executive trip to Knoxville, Tennessee when local transportation by Mr. Downey could be obtained for \$48.00 (Expense Report signed 6-4-07)
Hyneman Chuck	8/30/09	0671A	Does GPE's Code of Ethical Business Conduct re: Cooperation with Investigations apply with the MPSC's Staff construction audits of laten 1 & 2, Sibley 3, and Jeffrey 1-3? If no, please identify the corporate policy that does apply to these audits. If yes, please identify the individual(s) responsible for KCP&L's compliance with its Code of Conduct relative to cooperation with investigations for the MPSC audit of laten 1 & 2.
Hyneman Chuck	8/31/09	692.1	1. Please provide a copy of the analysis supplied in response to this DR in Microsoft Excel format with formulas intact. 2. Please provide the source (original source document) and basis or rationale for each input variable used in the analysis such as interest rates, assumptions, tax rates, depreciation rates, etc. 3. Please provide a copy of the request for proposal (RFP) created by KCP&L for the lease of these rail cars and all responses to this RFP. 4. Please provide a copy of the RFP created by KCP&L for the purchase of these rail cars and all responses to this RFP. 5. Please provide the names of all individuals who were involved in deciding to lease versus buy these rail cars.
Hyneman Chuck	9/2/09	723	1. Please provide a copy of each and every invoice submitted by, and payment voucher prepared for Jefferson Wells for costs charged to the laten construction projects. 2. Please also provide a copy of the workproduct(s) produced by Jefferson Wells for KCP&L, in support of all payments made by KCP&L to this vendor. 3. Please provide a copy of all contracts between KCP&L and Jefferson Wells, including all change orders and purchase orders issued under the contract. If no contract was entered into, please provide a copy of the engagement letter and each and every purchase order issued. 4. Please provide a copy of all correspondence with Jefferson Wells and all documents included in KCP&L's "correspondence file" associated with the Jefferson Wells contract (if no contract, that communications in regards to work performed). 5. Please provide a description of the due diligence actions taken prior to contracting with this vendor, including the names of KCPL employees who recommended this vendor and the reasons why this vendor was selected. 6. Please also provide a description of how the Jefferson Wells fees charged were Please provide a listing of the KCPL employees who entered the laten site on the following days with the time each individual arrived and left the site: 11/3/06; 11/8/06; 11/14/06; 11/17/07; 2/8/07; 2/12/07; 3/8/07; 3/15/07; 3/23/07; 3/28/07; 4/12/07; 4/20/07; 5/18/07; 5/22/07; 5/25/07; 6/21/07; 6/25/07; 7/31/07; 8/3/07; 8/16/07; 8/16/08; 2/12/08; 2/15/08; 2/19/08; 2/20/08; 2/22/08; 3/4/08; 3/11/08; 3/14/08; 3/18/08; 3/19/08; 3/25/08; 4/3/08; 4/4/08; 4/8/08; 4/11/08; 4/22/08; 4/24/08; 4/25/08; 5/1/08; 5/2/08; 5/5/08; 5/7/08; 5/9/08; 5/13/08; 5/23/08; 6/18/08; 6/27/08; 7/30/08; 8/18/08; 8/27/08; 9/1/08; 9/2/08; 9/11/08; 9/12/08; 9/17/08; 9/18/08; 9/30/08; 10/2/08; 10/16/08; 10/22/08; 10/29/08; 10/31/08; 11/05/08; 11/14/08; 11/19/08; 12/3/08; 12/10/08; 1/21/09; 1/28/09; 2/4/09; 2/8/09; 2/18/09; 2/25/09; 3/4/09; 3/11/09; 3/18/09; 4/22/09; 4/29/09; 5/6/09; and 5/20/09
Hyneman Chuck	9/2/09	0657S2	Please provide a listing of the KCPL employees who entered the laten site on the following days with the time each individual arrived and left the site: 11/3/06; 11/8/06; 11/14/06; 11/17/07; 2/8/07; 2/12/07; 3/8/07; 3/15/07; 3/23/07; 3/28/07; 4/12/07; 4/20/07; 5/18/07; 5/22/07; 5/25/07; 6/21/07; 6/25/07; 7/31/07; 8/3/07; 8/16/07; 8/16/08; 2/12/08; 2/15/08; 2/19/08; 2/20/08; 2/22/08; 3/4/08; 3/11/08; 3/14/08; 3/18/08; 3/19/08; 3/25/08; 4/3/08; 4/4/08; 4/8/08; 4/11/08; 4/22/08; 4/24/08; 4/25/08; 5/1/08; 5/2/08; 5/5/08; 5/7/08; 5/9/08; 5/13/08; 5/23/08; 6/18/08; 6/27/08; 7/30/08; 8/18/08; 8/27/08; 9/1/08; 9/2/08; 9/11/08; 9/12/08; 9/17/08; 9/18/08; 9/30/08; 10/2/08; 10/16/08; 10/22/08; 10/29/08; 10/31/08; 11/05/08; 11/14/08; 11/19/08; 12/3/08; 12/10/08; 1/21/09; 1/28/09; 2/4/09; 2/8/09; 2/18/09; 2/25/09; 3/4/09; 3/11/09; 3/18/09; 4/22/09; 4/29/09; 5/6/09; and 5/20/09
Hyneman Chuck	9/2/09	704.1	Please arrange for a meeting to discuss the unit of property classification for each of the assets shown on the five (5) page Asset Valuation Summary contained in Mr. Jones' March 6, 2009 Common Systems Asset Valuation binder
Hyneman Chuck	9/3/09	655.1	Please provide a copy of each and every expense report (with receipt attachments), a copy of each and every T&E statement, and each and every time sheet for Mr. Churchman for the period June 1, 2009 through September 2, 2009.
Hyneman Chuck	9/3/09	630.4	Please provide a copy of each and every invoice submitted by Sonnenschein Nath & Rosenthal, LLP and charged to the laten 1 workorder, laten 2 work order or laten common plant work order. Please also include the payment voucher showing where the invoiced costs were charged.
Hyneman Chuck	9/10/09	637.1	Please provide a copy of each and every communication between GPE/KCPL and STS related to the laten construction projects, including but not limited to emails, letters, notes of phone conversations, etc.

Attachment 2

ER-2009-00889

Requestor	Date Received	Item No.	Question
Majors Keith	9/10/09	06231	1. Please explain why the AFUDC debt and equity dollars shown on the original response to DR 0623 are not equal to the amounts that would be calculated by multiplying the Total AFUDC Base by the debt and equity rates for the month. If the difference is due to adjustments, please explain the nature of the adjustment. 2. For substantially all months, the AFUDC debt and equity rates shown on the original response for project 51-00029 are different from the debt and equity rates for the other latan 1 projects. Please explain why a different rate was used for this project.
Hyneman Chuck	9/11/09	0622.31	Question 0622.3 requested additional information so that certain "miscellaneous" lines in the attachment to DR 0622 and 0622.1 could be broken down by vendor. While the new worksheets included in the attachment provide some additional vendor information, a complete breakdown was not provided. Of specific interest is the \$18 million for latan 1 reflected on the line titled "Misc Actuals". Please provide additional information so that this amount can be sorted by vendor.
Hyneman Chuck	9/14/09	725	1. Reference the Strategic Talent Solutions invoice dated 3/30/06. Please provide a complete copy of the leader assessment report in which the costs were charged to account 107. 2. Reference the Strategic Talent Solutions invoice dated 5/14/06. Please provide a complete copy of the leader assessment report in which the costs were charged to account 107. 3. Please provide a copy of any and all additional leader assessments or development assessments or related documents in which the costs were charged to latan 1 or latan 2 or latan common. 4. Please show all account distributions where costs were charged and show the allocation of the costs between projects.
Hyneman Chuck	9/14/09	724	Please provide a current copy of the following reports, listings: 1. KCP&L Listing of Expense Projects, and 2. Any document that lists all the project numbers and descriptions of each project that has costs charged to latan 1 and/or latan 2 and/or latan common construction work orders.
Majors Keith	9/17/09	623.2	Provide an update to the original response to DR 623 for all latan 1 environmental costs through the most recent available month with any additional corrections from the original response to DR 623.
Schallenberg Bob	9/17/09	07111	Certain Board presentations or documentation related to latan construction projects were mentioned in the Board of Director meeting minutes but were not included in the Board presentation material provided for Staff's 9-16-09 review. The following three items are possible omissions from the material provided. Please check these presentations to determine if additional latan-related presentations to the Board should be submitted to Staff for review. 1) Mr. Churchman 12/2/08 presentation to Board of Directors 2) Messrs Churchman, Ellis, Ms Jenks 5/4/09 presentation to Audit Committee 3) Messrs Downey & Churchman 5/4/09 latan items discussed with Board of Directors
Hyneman Chuck	9/17/09	472.1	1. Please update this data request response for all audits (internal and external) of latan 1 which have been completed to date. 2. Please list all audits that are currently in existence. 3. Please list all audits that are planned for the future.
Hyneman Chuck	9/17/09	473.1	1. Please update this data request response for all audits (internal and external) of latan 2 which have been completed to date. 2. Please list all audits that are currently in existence. 3. Please list all audits that are planned for the future.
Hyneman Chuck	9/17/09	637.2	1. What is the first date in which Strategic Talent Solutions (STS) first began to provide consulting services to KCPL? 2. Please describe how STS was selected to provide this initial work for KCPL. 3. Was STS selected as a sole source vendor to do this work? 4. If it was a sole source award, who recommended awarding the work to STS and who recommended using the sole source procurement methodology? 5. If it was not a sole source, please provide a copy of the request for proposal or other scope of work request letters sent to potential vendors.
Hyneman Chuck	9/17/09	726	Please provide a copy of Mr. Carl Churchman's employment contract with KCPL as well as all KCPL communications with Mr. Churchman concerning his pay, benefits, and work responsibilities.
Hyneman Chuck	9/17/09	727	1. Please provide the names and job descriptions of employees in GPES' Audit Services Department. 2. Do any current members of GPES' Audit Services Dept have construction audit experience and/or construction audit or project management education excluding the latan construction projects? If yes, please provide a copy of individual resumes which reflect this experience and/or education.
Majors Keith	9/18/09	729	Refer to page 2 of the minutes of the Great Plains Energy Incorporated Board of Directors Audit Committee dated May 4, 2009 discussing the downgrade of GPE commercial paper from A-2 to A-3 where the following appears: "The Committee directed management to prepare and present at the next Committee meeting an analysis of a one-notch downgrade at Great Plains Energy, KCP&L, and GMO, as well as contingency plans to address the potential impacts of such a downgrade." 1) Provide the analysis and all supporting documentation presented to the Audit Committee of the Board of Directors or the Board of Directors concerning this topic. 2) Provide the commercial paper rating for GPE commercial paper for all dates from January 2006 to August 2009 from the primary agency (Moody's, S&P, or Fitch) used to value GPE commercial paper. 3) Provide the correspondence from S&P to GPE informing management of the most recent commercial paper downgrade.
Hyneman Chuck	9/18/09	728	Please provide a copy of each and every invoice submitted by, and payment voucher prepared for Marano Consulting LLC for costs charged to the latan construction projects. 2. Please also provide a copy of the workproduct(s) produced by Marano for KCPL, in support of all payments made by KCPL to this vendor. 3. Please provide a copy of all contracts between KCPL and Marano including all change orders and purchase orders issued under the contract. If no contract was entered into, please provide a copy of each and every purchase order issued. 4. Please provide a copy of all correspondence with Marano and all documents included in KCPL's "correspondence file" associated with the Marano contract (if no contract, that communications in regards to work performed). 5. Please provide a description of the due diligence actions taken prior to contracting with this vendor, including the names of KCPL employees who recommended this vendor and the reasons why this vendor was selected. 6. Please also provide a description of how the Marano fees charged were determined to be reasonable and competitive in the market.
Test	9/18/09	Test	Test
Schallenberg Bob	9/21/09	06371	When was the organizational change made whereby David Price began reporting directly to Bill Downey?
Hyneman Chuck	9/22/09	04151	Please provide an unredacted copy of all invoices from Schiff Hardin for work charged to the costs of the latan 1 or 2. 04151: Please update DR 415 for a complete copy of all Schiff-Hardin invoices and payment vouchers through the current date.
Hyneman Chuck	9/22/09	637.3	1. Reference the Strategic Talent Solutions invoices provided in response to DR 637, for each of the following expense charges listed, please provide responses to the following four questions. Also, some individual items listed have additional documentation requests. *Who at KCPL approved the invoiced amount? *What was the basis for the determination that the charge was reasonable when the invoiced amount was approved for payment (e.g. what specific actions were taken)? *Whether or not KCPL considers the charge to be within its policies for expense reimbursement; *Whether or not KCPL believes the charges were consistent with STS' pledge in its March 9, 2007 memo to "make every effort to find reasonable airfare and hotel rates"; Invoice # 334, 5/10/2007 a. The Westin Crown Center Invoice Nbr 173473 dinner at Benton's for \$95.10 - please provide additional receipts. Was this dinner just for Mr. Philbin? b. The Westin Crown Center Invoice Nbr 173473 room rate (excluding taxes, internet) of \$229. c. American Airlines receipt for John Philbin dated 3/20/07 for \$649.80. Please provide a complete copy of all receipts. Chris, can you check with Forest and find out when he is going to be in the HQ building? I would like to come over and meet with him in the workroom on the 15th floor about how to manipulate some of the data in the spread sheets and talk with him about the best way I can create and verify costs for latan 1 and latan 2 by vendor. I don't expect the meeting to take any longer than 1/2 hour. I will primarily focus on the response to Question No. . . 0622.31
Hyneman Chuck	9/23/09	0622.312	Chris, can you check with Forest and find out when he is going to be in the HQ building? I would like to come over and meet with him in the workroom on the 15th floor about how to manipulate some of the data in the spread sheets and talk with him about the best way I can create and verify costs for latan 1 and latan 2 by vendor. I don't expect the meeting to take any longer than 1/2 hour. I will primarily focus on the response to Question No. . . 0622.31

Attachment 2

ER-2009-00889

Requestor	Date Received	Item No.	Question
Schallenberg Bob	9/24/09	0624.11	In the 9-23-09 follow-up meeting to DR 0624.1 regarding the sale of Great Plains Power (GPP) assets to KCPL, a schedule provided in DR 0624.1 titled "KCP&L Only charges As of 3-31-09" was discussed. This schedule showed that \$31,055.49 of the purchase price from GPP was charged to an latan 1 project. Please provide the following information:1. What is the nature of the work to which these charges apply?2. Why was a portion of such costs determined to pertain to latan 1?3. How was the portion applicable to latan 1 determined? 4. How specifically are these assets related to the environmental upgrades at latan 1?5. Update the schedule titled "KCP&L Only charges As of 3-31-09" to May 31, 2009.
Majors Keith	9/24/09	0624.12	In the 9-23-09 follow-up meeting to DR 0624.1 regarding the sale of Great Plains Power (GPP) assets to KCPL, John Grimwade provided certain documents as examples where work product created for GPP relating to its Weston Bend power plant was directly used in work product completed for KCPL's latan 2 power plant. Please provide copies of these documents including: a) March 3, 2004 letter from Burns & McDonald to John Grimwade regarding latan 2 Phase 1 Development - Preliminary Engineering Report - Proposal for Engineering Services, b) October 2004 Environmental Report prepared by URS for GPP regarding its Weston Bend Power Plant, and c) May 2005 Draft Environmental Report prepared by Burns & McDonald for the US Army Corps of Engineers on behalf of KCP&L for its latan 2 power plant. According to EXHIBIT A to the Bill of Sale provided in the response to DR 624.1, the assets sold by GPP to KCP&L included internal labor previously incurred by various KCPL departments for and billed to GPP. Please provide the service agreement between Great Plains Power and KCP&L. Provide documentation of the labor previously incurred by various KCPL departments and all filings, briefs or other related documents filed or prepared by or on behalf of KCPL in any litigation related to the May 2008 crane incident. Please provide a copy of the case numbers and all filings, briefs or other related documents filed or prepared by or on behalf of KCPL in any litigation related to the May 2008 crane incident.
Hyneman Chuck	9/24/09	715.1	
Hyneman Chuck	9/25/09	673.1	1. Identify any David Price sent e-mails that have removed or edited from the emails collected in response to DR 673. 2. Provide the purpose of the reviews that was performed on the e-mails collected in response to DR 673. 3. Please identify the person(s) who conducted the review of these emails.
Hyneman Chuck	9/29/09	730	Reference the latan 1 Cost Portfolio budget item - X016 Construction Trailer Relocation - also known as Campus Relocation. 1. Please provide a description of this cost item including how the costs originated, who determined that the costs were necessary, how far the trailers were moved, and when the relocation took place. 2. Are these costs included in a contract change order? If not, please explain why they are not included. 3. Who approved the above referenced costs? 4. What are the reasons why the trailers were moved? 5. What is the dollar amount of costs charged for this work by month, by project, by work order (Unit 1, Common and Unit 2) 6. Please provide a copy of each and every correspondence between KCPL, its consultants, and its contractors, relating to costs incurred for trailer relocation. 7. Please identify all EOC meetings where this cost was discussed.
Hyneman Chuck	9/29/09	731	Please provide a list and description of each and every latan cost report prepared by KCPL employees or contractors for latan 1, latan 2 and latan Common. Please indicate if these reports are recurring or were produced for a limited period.
Hyneman Chuck	9/29/09	06221	In a meeting on September 25, 2009, Forrest Archibald mentioned KCC DR's 54 and 54S. Please provide the responses to KCC DRs 54 and 54S recently submitted on KS docket 04-KCPE-1025-GIE. Because the questions in DR 54 and 55 only request information for certain months, identify the period and information being provided.
Hyneman Chuck	9/30/09	06481	Please set up a meeting to discuss the response to DR 0648, Owner Controlled Insurance.
Hyneman Chuck	9/30/09	06521	Please set up a meeting to discuss the response to DR 0709, GPM Audit, presence.
Hyneman Chuck	9/30/09	07091	Please set up a meeting to discuss the response to DR 0709, GPM Audit, presence.
Schallenberg Bob	9/30/09	06661	Question 5 of this DR refers to Mr. Easley's Expense Report signed 11/8/07, please provide the rationale for charging mileage expense to project 52-00123 for the Joyce McCool Meeting (10/5/07) and Claire Jones Meeting (10/10/07). KCP&L's response was that KCPL correctly charged the mileage associated with the meetings with Ms. McCool and Ms. Jones. In this DR response KCPL stated that on May 23, 2008, an incident at the latan site resulted in two fatalities. Mr. Easley met with the wives of the decedents. KCPL's response indicates that Mr. Easley charged costs in 2007 for an accident that did not occur until May 2008. In addition, there was only one reported fatality from the 5/23/08 crane accident. There were two fatalities from a steam pipe rupture occurring at latan 1.
Hyneman Chuck	9/30/09	07081	DR 0708 asked for copies of Mr. Giles' and Mr. Riggins' expense reports for the period June 2005 through July 2009. Secondly it asked for copies of all receipts in KCPL's possession supporting each and every reimbursement for expenditures charged or related to latan 1 and latan 2 construction projects during this time frame. KCPL did not provide Mr. Giles' expense reports for this period as requested in the DR, indicating that "Mr. Giles expense reports are not included because there were no charges to the latan 1 or latan 2 construction projects." Mr. Giles' expense reports are required to be provided and this DR is still considered open.
Hyneman Chuck	9/30/09	07091	KCPL is aware that Aquila as a non-related party did construction audits independent of KCPL prior to being acquired by KCPL. After the acquisition the Staff understands that Aquila/GMO is no longer allowed to continue these independent audits and KCPL (GPE) is not auditing itself, a non-independent audit, in lieu of GMO auditing KCPL. Therefore the same level of audit presence and oversight is not being done. Therefore, the documents requested in the body of this DR are required to be provided. Please provide these documents as soon as possible.
Hyneman Chuck	9/30/09	07231	In its response to DR 0723, is KCPL saying that it requested documentation of incurred expenses by Jefferson Wells and Jefferson Wells did not provide them? Did KCPL pay Jefferson Wells when Jefferson Wells failed to provide the requested documentation? What exactly did Ms Schumaker review to determine the expenses were reasonable? In my review of the invoices I did not see anything that listed the types and amounts of expenses.
Hyneman Chuck	10/5/09	732	Reference KCPL Audit Services latan Construction Project third Quarter 2008 Cost Tracking and Accounting Audit, April 2009 page 10 Action Plan items 1 through 4. Please provide a copy of the reassessment mentioned in action plan item 1, a copy of all the purchase orders referenced in action plan item 2, copy of the new policy, including approval signatures and dates referenced in action plan item 3, and a list and description of controls referenced in action plan 4. Please also provide a copy of the market data analysis and the related Construction Management documentation to substantiate the referenced business decisions.
Hyneman Chuck	10/5/09	733	For all invoices over \$50,000 related to latan construction projects, please provide a copy of all completed and signed Invoice Review Process Checklists since its implementation by Contract Administration through August 31, 2009 for all latan construction projects.
Hyneman Chuck	10/5/09	734	Please provide copies of all invoices for claims asserting late payment of invoices by KCPL. Were any charges for late payment of invoices included the Unit 1, Unit 2 or Common work orders? If yes, please provide a copy of the change order supporting the payment and identify the dollar amount paid, date paid, vendor, CEP activity code and project number.
Majors Keith	10/6/09	735	Please provide a listing of the KCPL employees who entered the latan site on the following days with the time each individual arrived and left the site: 2/6/08, 3/5/08, 3/28/08, 5/21/08, 5/29/08, 8/25/08, 8/29/08, 9/10/08, 11/26/08
Majors Keith	10/6/09	736	Please provide the entry date and time that correspond with Mr. Downey's 8/27/08 exit date and time at the latan site.
Majors Keith	10/6/09	737	Please provide copies of the Burns & McDonnell Status Reports related to their work on latan 1 and 2 since June 1, 2005.

Attachment 2

ER-2009-0889

Requestor	Date Received	Item No.	Question
Majors Keith	10/6/09	738	Does KCPL have any documentation regarding the proper recording of interview expenses? If yes, please provide a copy of such documentation. Please provide an explanation and copies of any supporting the explanation related to the expensing of Mr. Churchman's interview expenses on his 5/28/08 Expense Report and the charging the Interview Dinner costs to latan 1 & 2 on his 10-22-08 Expense Report.
Majors Keith	10/6/09	739	Please provide the entry time related to Mr. Downey's 5-13-08 exit shown on the latan Site log provided in DR 657.
Majors Keith	10/6/09	740	Please provide the explanation for the Downey response on DR 688 item 6 that Mr. Downey made two trips on 5-23-08 and the latan site log showing only one entry & exit.
Majors Keith	10/6/09	741	Please provide the exit time related to Mr. Churchman's entry at the latan site on 5-27-08
Majors Keith	10/6/09	742	Please provide the exit time related to Mr. Churchman's entry at the latan site on 5-23-08
Majors Keith	10/6/09	743	Referring to Mr. Churchman's 10-22-08 and 11-24-08 mileage charges for September 08 reimbursement for 16 days (1,216 miles divided by 16), please provide an explanation for the difference between the 16 days reimbursed and the 14 specific September dates listed on his 10-22-08 Expense Report.
Majors Keith	10/6/09	744	Please provide an explanation of the difference between Mr. Churchman's 9/30/08 mileage charge to latan 2 on his 10-22-08 & 11-24-08 Expense Reports and the site access report (DR 657s) not showing Mr. Churchman's entry or exit on that day.
Majors Keith	10/6/09	745	Please provide all documentation used by Mr. Downey to determine that Mr. Churchman's 8/6/08 \$329.60 charge on his 10-22-08 Expense Report for a Dinner interview of a potential project director candidate with his wife was reasonable. Were all candidates for this position interviewed in a dinner setting? Does KCPL have a hiring policy, procedure, or other documentation addressing the need and cost for dinners for candidates and their wives to conduct its hiring process? If yes, please provide a copy of all such documentation.
Majors Keith	10/6/09	746	Please provide all documentation used by Mr. Downey to determine that Mr. Churchman's 8/12/08 Business Dinner charge of \$535.04 for four individuals regarding Regulatory Meeting Preparations on his 10-22-08 Expense Report was reasonable. If no documentation exists, please provide an explanation of how this expenditure was determined reasonable without the detail receipt showing menu items and alcoholic beverages, if any, purchased for the \$535.04 charge. Please provide explanation for the entire amount being charged to latan.
Majors Keith	10/6/09	747	Please provide the explanation for charging the cost of Mr. Churchman's 8/17/08 dinner meeting to discuss pending Rate Case Filing Date on his 10-22-08 Expense Report to latan 1 and 2. Are the EOC rate case filing issues the same as the matters reflected in the 7/31/08 CEP Oversight Committee meeting minutes under the "Rate Case Plan" section? If yes, please provide the reason that the matters could not have been discussed at a meeting scheduled during regular business hours without the cost of the meal.
Majors Keith	10/6/09	748	Please provide the explanation for charging the cost of Mr. Churchman's 8/29/08 lunch meeting to discuss EOC rate case filing issues on his 10-22-08 Expense Report to latan 1 and 2. Are the EOC rate case filing issues the same as the matters reflected in the 7/31/08 CEP Oversight Committee meeting minutes under the "Rate Case Plan" section? If yes, please provide the reason that the matters could not have been discussed at a meeting scheduled during regular business hours without the cost of the meal.
Majors Keith	10/6/09	749	Please provide copies of all documentation related to the 8/29/08 EOC meeting.
Majors Keith	10/6/09	750	Please provide the latan business purpose/topic related to Mr. Churchman's 8/25/08 dinner meeting charge on his 10-22-08 Expense Report. Please provide copies of all documentation latan business purpose/topic discuss at this meeting.
Majors Keith	10/6/09	751	Please provide an explanation of the difference between Mr. Churchman's 5/7/08 mileage charge to latan 1 & 2 on his 9/18/08 Expense Report and the site access report (DR 657s) not showing Mr. Churchman's entry or exit on that day
Majors Keith	10/6/09	752	Please provide an explanation of the difference between Mr. Easley's 4/25/08 mileage charge to latan 2 on his 5-20-08 Expense Report and the site access report (DR 657s) not showing Mr. Easley entry or exit on that day
Majors Keith	10/6/09	753	Please provide an explanation of the difference between Mr. Easley's 5/2/08 mileage charge to latan 2 on his 5-20-08 Expense Report and the site access report (DR 657s) not showing Mr. Easley entry or exit on that day
Majors Keith	10/6/09	754	Please provide an explanation of the difference between Mr. Easley's 7/31/07 mileage charge to latan 2 on his 8-21-07 Expense Report and the site access report (DR 657s) not showing Mr. Easley entry or exit on that day
Majors Keith	10/6/09	755	Please provide an explanation of the difference between Mr. Downey's 8/3/07 mileage charge to latan 2 on his 12-20-07 Expense Report and the site access report (DR 657s) not showing Mr. Downey's entry or exit on that day
Majors Keith	10/6/09	756	Please provide an explanation of the difference between Mr. Easley's 8/16/07 mileage charge to latan 2 on his 8-21-07 Expense Report and the site access report (DR 657s) not showing Mr. Easley's entry or exit on that day
Majors Keith	10/6/09	757	Please provide the date and time for Mr. Downey and Easley's entry to the latan site related to their exit entries shown on 4/8/08
Majors Keith	10/6/09	758	Please provide the date and time for Mr. Downey entry to the latan site related to the exit entry shown on 10/29/08.
Majors Keith	10/6/09	759	Please provide an explanation of the difference between Mr. Easley's 4/3/08 mileage charge to latan 2 on his 5-20-08 Expense Report and the site access report (DR 657s) not showing Mr. Easley's entry or exit on that day
Majors Keith	10/6/09	760	Please provide an explanation of the difference between Mr. Easley's 3/25/08 mileage charge to latan 2 on his 5-20-08 Expense Report and the site access report (DR 657s) not showing Mr. Easley's entry or exit on that day
Majors Keith	10/6/09	761	Please provide the date and time for Mr. Downey's entry to the latan site related to the exit entry shown on 3/14/08
Majors Keith	10/6/09	762	Please identify the third party latan vendor that invited some KCPL employees to "Bodies Revealed" affair as noted in the response to Data Request Number 702
Majors Keith	10/6/09	763	Please provide an explanation of the difference between Mr. Downey's 2/25/09 mileage charge to latan 2 on his 4-7-09 Expense Report and the site access report (DR 657) not showing Mr. Downey's entry or exit on that day
Majors Keith	10/6/09	764	Please provide an explanation of the difference between Mr. Downey's 2/4/09 mileage charge to latan 2 on his 4-7-09 Expense Report and the site access report (DR657) not showing Mr. Downey's entry or exit on that day
Majors Keith	10/6/09	765	Please provide an explanation of the difference between Mr. Downey's 11/14/08 mileage charge to latan 2 on his 12-10-08 Expense Report and the site access report (DR657) not showing Mr. Downey's entry or exit on that day
Majors Keith	10/6/09	766	Please provide an explanation of the difference between Mr. Downey's 11/5/08 mileage charge to latan 2 on his 12-10-08 Expense Report and the site access report (DR657) not showing Mr. Downey's entry or exit on that day
Majors Keith	10/6/09	767	Please provide an explanation of the difference between Mr. Downey's 9/17/08 mileage charge to latan 2 on his 9-26-08 Expense Report and the site access report (DR657) not showing Mr. Downey's entry or exit on that day
Majors Keith	10/6/09	768	Please provide the specific business purpose for Mr. Downey's 10/31/08 site visit to the latan site.

Attachment 2

ER-2009-0089

Requestor	Date Received	Item No.	Question
Majors Keith	10/6/09	769	Please provide an explanation of the difference between Mr. Downey's 9/1/08 mileage charge to latan 2 on his 9-26-08 Expense Report and the site access report (DR657) not showing Mr. Downey's entry or exit on that day.
Majors Keith	10/6/09	770	Please provide an explanation of the difference between Mr. Easley's 8/18/08 mileage charge to latan 2 on his 9-10-08 Expense Report and the site access report (DR657) not showing Mr. Easley's entry or exit on that day.
Majors Keith	10/6/09	771	Please provide copies of any modifications or updates that have been made to the June 2007 latan Construction Project Execution Plan.
Majors Keith	10/6/09	772	Who is Laciada Kramer and the relationship with KCPL? What was the business purpose of the luncheon on 2/21/07 charged to latan 2 on Mr. Grimwade's 5/25/07 Expense Report? What were Mr. Grimwade's responsibilities regarding latan 2 at the time of this luncheon? Please identify the employee that approved this charge
Majors Keith	10/6/09	773	Please provide the justification for charging 25% of the costs to latan 1 of the 11/26/07 Mr. Price business meal with M. Wohlschlegel to discuss steam turbine generator technical issues with Toshiba on Mr. Price's Expense Report signed 12-13-07
Majors Keith	10/6/09	774	Please provide copies of all documentation discussed or generated as a result of the 10/29/07 Mr. Price business meal meeting w D. Schumaker, M. Ballard & Steve Jones on Procurement Process & Compliance Issues. Please provide copies of all documentation identifying the specific Procurement Process & Compliance Issues discussed at this meeting.
Majors Keith	10/6/09	775	Please provide the rationale for charging all Mr. Price's 10/3/07 mileage to the CEP mtg @ LaCygne to latan on his 10/25/07 Expense Report.
Majors Keith	10/6/09	776	Please provide the rationale for charging all the mileage to latan 1 & 2 from Mr. Price's 9/12/07 trip to Jefferson City as charged on his 10/25/07 Expense Report
Majors Keith	10/6/09	777	Was the Project Director position noted on Mr. Price's 10/25/07 Expense Report for latan 1 or 2? If yes, please explain why the cost of these meals was not charged to latan.
Majors Keith	10/6/09	778	Please provide the rationale for charging all the mileage to latan 1 & 2 from Mr. Price's 10/3/07 trip to LaCygne for CEP Steering Committee Mtg as charged on his 10/25/07 Expense Report
Majors Keith	10/6/09	779	Did Mr. Churchman ever charge KCPL for airfare for his 5/8-9/08 to Beihesda, Maryland for the Marks ADR Meeting? If yes, please provide a copy of the related Expense Report with supporting receipts. If no, please provide an explanation regarding the reason Mr. Churchman was not reimbursed
Majors Keith	10/6/09	780	Please provide the rationale for charging latan 2 for a portion of Mr. Churchman's 5/29/08 business mileage to Chillicothe, Mo on his 9/18/08 Expense Report to attend funeral of crane incident victim. Was Mr. Churchman attending the funeral as a representative of KCPL or on his own initiative?
Majors Keith	10/6/09	781	Please provide the rationale for Mr. Churchman charging latan on his 9/18/08 Expense Report for the 8/3/08 cost of airfare to return to KC for Board preparation. When was Mr. Churchman scheduled to return to KC? Did he receive any credit for his unused flight? If yes, was this credit reflected in the determination of the amount Mr. Churchman was reimbursed?
Majors Keith	10/7/09	782	For each Burns & McDonnell employee that charged mileage to KCPL for its latan 1 environmental upgrades or latan 2 construction, please provide copies of all documentation used by the approving KCPL employee that the amount of mileage being reimbursed was consistent with KCPL's policy. Please provide home and business address for each KCPL employee at the time they requested mileage for travel to latan.
Majors Keith	10/7/09	783	Regarding the cost of change fees on Mr. Churchman's 5/28/08 Expense Report, please provide a copy of the actual credit card statement requesting payment of the airfare for the planned trip as well as the replacement trip. Was the planned trip business or personal? If business, please provide the business purpose for the initial trip. If personal, please provide the name of the KCPL employee that required Mr. Churchman to forego this trip and incur this cost. Please describe the work activities that required Mr. Churchman's personal attention and could not be addressed by phone as needed.
Majors Keith	10/7/09	784	Please provide copies of all comments KCPL submitted to in response to the matters raised in the audit reports provided in DR 472 and Question No. 25 in EM-2007-0374.
Majors Keith	10/7/09	785	Please provide the explanation for Mr. Easley's 5-23-08 mileage charges to latan and the latan Site log showing no entrance or exit.
Majors Keith	10/7/09	786	Please provide a description of the nature of Mr. Easley's business conducted in 18 minutes at the latan site related to his 8/3/07 mileage charge to latan 2 on his 8/21/07 Expense Report.
Majors Keith	10/7/09	787	Please provide an explanation of how Mr. Easley shows attending a Commitment to Safety meeting at latan with Mr. Downey when the site log shows no entry or exit for Mr. Downey on this date.
Majors Keith	10/7/09	787	For each KCPL employee that charged mileage to latan 1 environmental upgrades or latan 2, please provide copies of all documentation used by the approving employee that the amount of mileage being reimbursed was consistent with KCPL's policy. Please provide home and business address for each KCPL employee at the time they requested mileage for travel to latan.
Herrington Karen	10/9/09	167	1. Please provide the journal entries (both debits and credits) and a description of the journal entries made to accounts 182.450 through account 182.453 from January 1, 2007 through the current date. 2. For each amount charged to accounts 182.450 through 182.453 from January 1, 2007 through the current date, please provide the following information: Date charged general ledger, amount charged, vendor name, detailed description of the service performed. 3. For all costs budgeted to be charged to accounts 182.450 through 182.453 from January 1, 2007 through December 31, 2007, please provide the following information: Estimated date charged general ledger, estimated amount charged, vendor name, detailed description of the service projected to be performed. 4. For all costs charged to accounts 182.450 through 182.453 from January 1, 2007 through the current date, please provide the invoice submitted by the vendor and a copy of the complete work product provided to KCPL and/or GPE. (ER-2007-0291) (DR 0130) 2. Please provide the journal entries (both debits and credits) and a description of the journal entries made to Please provide copies of the request for proposals, vendor proposals, evaluation and selection of vendor, and signed contracts for the turbine work performed during the outage preceding the latan 1 AQCS in-service in April, 2009. Please provide copies of the journal entries recording the cost of this turbine work. Please arrange a meeting to discuss after the information is provided.
Majors Keith	10/9/09	789	Please identify the number of individuals/firms besides Mr. Jones that were interviewed or reviewed to perform the job duties ultimately performed by Mr. Jones. To the extent Mr. Jones was the only individual interviewed for these functions, please identify any KCPL employee that suggested Mr. Jones be utilized or was used as a reference for his selection. Please provide copies of documentation supporting the decision to hire Mr. Jones over other candidates or firms.
Majors Keith	10/9/09	790	Please provide a copy of the contract between Mr. Jones and KCPL for his services during the period February 1, 2006 through September 30, 2009.
Majors Keith	10/9/09	791	Does KCPL disagree with Mr. Jones' description of his work for KCPL listed on page 12 lines 11 through 25 of his 4/1/08 deposition in Case EM-2007-0374? If no, please provide the explanation supporting the charging all of his time on Mr. Jones' 4/1/06 Check Request for reimbursement to latan 2 to the exclusion of the other CEP projects. If yes, please provide KCPL's description of the nature of Mr. Jones duties and responsibilities relative to the period he performed services for KCPL.
Majors Keith	10/9/09	792	Concerning Mr. Jones 4/1/2006 Check Request for reimbursement of expenses for cab fare of \$38 from KCI Airport to 1201 Walnut and \$15 parking at Town Pavilion Parking, please provide the explanation for reimbursing Mr. Jones' parking charge after traveling to work by cab.
Majors Keith	10/9/09	793	Please provide the approved copy of the economic analysis (EVA) for latan 1 SCR. See 6/19/06 e-mail from Gaichylee Smith to Jeffrey Fleener.

Attachment 2

ER-2009-0089

Requestor	Date Received	Item No.	Question
Majors Keith	10/9/09	794	Please provide the attachment for Mr. Easley's 6/6/06 e-mail to Barbara Curry, William Downey, Dana Crawford, John R. Marshall, Michael Chesser, and Terry Bassham.
Majors Keith	10/9/09	795	Please provide the attachment for Mr. Easley's 6/9/06 e-mail to Brad Beecher and Max Sherman
Majors Keith	10/9/09	796	Do the latan AQCS and latan 2 construction projects use Engineering Change Notices? If yes, please provide a listing of each such notice related to both projects.
Majors Keith	10/9/09	797	What do the acronyms PEP, R&Rs & ECN stand for in the Plan of the Day meeting minutes on 2/1/07 & 1/31/07?
Majors Keith	10/9/09	798	Did Burns & McDonald have to re-issue drawings for the Alstrom lay-down area @ latan? If yes, what was the reason these drawings needed to be re-issued and who paid for the cost of the re-issue. Please identify the Burns & McDonald invoices that reflect the cost for the initial drawings and re-issue drawings.
Majors Keith	10/9/09	799	Please provide copies of the Lockton Open Item Monthly meeting minutes for the period June 1, 2005 through June 30, 2009. [1/26/07 POD]
Majors Keith	10/9/09	800	Please provide copies of the Mack Hargis or successor weekly meeting minutes for the period June 1, 2005 through June 30, 2009. [1/26/07 POD]
Majors Keith	10/9/09	801	Please provide the justification for Mr. Easley's mileage for a 7/31/07 Board meeting at latan being charged to latan 2. Please provide copies of the minutes from this Board meeting.
Majors Keith	10/9/09	802	Please provide copies of all documentation describing the role of KCPL's, GPE's, or GMO's Internal Audit Function during the period June, 1 2005 through September 30, 2009
Majors Keith	10/9/09	803	Was the latan campus moved or relocated after it was originally constructed to support the construction the latan 1 AQCS and latan 2? If yes, please provide copies of the documentation explaining the situation causing the move or relocation and the reasons these issues were not addressed when the latan campus was initially built.
Hyneman Chuck	10/13/09	723.1	Regarding the Classification of Jefferson Wells expenses: 1. Given the purpose of the services provided and their relationship to financial reporting, please explain the decision and provide the rationale why KCPL charged Jefferson Wells accounting services costs to the latan construction projects as opposed to expensing these charges in the period incurred. 2. Please provide a copy of all documentation requesting the services provided by Jefferson Wells and all documents approving the expenditure.
Majors Keith	10/13/09	07261	Set up a time to review the materials referenced in the response to DR 0726.
Majors Keith	10/13/09	071112	Provide copies or set up a time for on-site review of listed Audit-related documents: 2. 12/1/08 Audit Committee meeting - Copies of GPE Audit Services Charter before revision and after revision in January 2009.3. All documents made by Ms Jenks in her presentation to the 12/1/08 audit committee.4. GPE board meeting 2/9/09 and 2/10/09 - copy of Audit Services Proposed 2009 Audit Plan and any revisions to this proposed plan.5. Audit Committee meeting - Audit Services hours expended by category over the past 4 years.6. Any documents supporting Ms Jenks' plan or proposal to the audit committee to shift of latan audit effort from Ernst & Young to KCPL Audit Services.7. GPE Audit Committee meeting 2/9/09. Any documents or presentations related to the discussion of the CEP construction audit program, findings on Alstrom Power Construction Audit and associated action plan, findings on Procurement Audit and associated action plan. Copy of UI Planner budget system post implementation review and the actions taken and planned to be taken to address the findings in the audit.10. Audit Committee Set up a time for on-site review of listed Board-related documents:8. KCPL board meeting 2/10/09 - Mr. Churchman presentation and discussion on latan construction projects, including problems and plan of action for Unit 1 turbine.9. Copy of 8/5/08 board presentation on latan Construction Project.
Majors Keith	10/13/09	071113	The response to DR 0726 indicates that "Mr. Churchman does not have an employment contract with KCP&L." However, the Board of Directory minutes indicate that a bonus was paid to him to comply with his employment contract. If Mr. Churchman does not have an "employment contract", what contract required him to be paid a bonus?
Hyneman Chuck	10/16/09	072612	Provide the correspondence from Standard & Poor's to GPE informing management of the commercial paper ratings on the following dates: 10/20/00, 02/07/07, and 07/14/08.
Majors Keith	10/19/09	729.1	The response to DR 06231 indicates that: October 2007 AFUDC monthly rates should have been as follows: Equity = .001800Debt = .003967Please provide the corrected AFUDC electronic worksheet (Report 73) for October 2007 that supports the calculation of the rates above.
Majors Keith	10/22/09	062312	1. If KCPL did not award the Balance of Plant contract and accomplished this work as originally planned, would the campus relocation work still be required to be accomplished? 2. a. Were the original plant specifications that determined the original trailer locations deficient in any way and b. did they provide for adequate access to the turbine generator building? If not, please explain why not, given that the plans had to be changed. 3. Please provide the name of the Vice President of Construction who determined that the costs associated with this item were reasonable and necessary. 4. Please provide a copy of all presentations made on this relocation work at all CEP Oversight Committee or similar meetings. 5. If costs were incurred for laydown space needed for access to the turbine generator building and providing a new path for relocating the turbine generator into the turbine bay, why were costs charged to latan 1? 6. Please describe the basis for charging campus relocation costs to latan 1 and common plant.
Hyneman Chuck	10/22/09	730.1	Please provide a list containing the following: date of request and summary description of each and every data request or request for information related to the costs incurred for the latan construction projects that was provided to KCPL by Empire District Electric Company and Aquilar/GMO.
Hyneman Chuck	10/22/09	804	Reference DR65653, voucher 778425 Steve Jones Time and Expense Report 5/27/06 - 6/24/06. 1. What is the reason for the \$1,500 Town Pavilion room rental charge on 6/14/06, 6/15/06, and 6/16/06? 2. Why was it necessary for Mr. Jones to incur a \$344.39 meal charge at Grandma's Office Catering on May 31, 2006? How many meals were included in this charge? Why couldn't the other meal participants pay for the cost of their meal? Please provide the names of the individuals who participated in the meals and relationship to the latan projects.3. Why was it necessary for Mr. Jones to incur a \$359.13 meal charge at Cascone's on June 1, 2006? How many meals are included in this charge? Why couldn't the other meal participants pay for the cost of their meal? Please provide the names of the individuals who participated in the meals and relationship to the latan projects.4. Why was it necessary for Mr. Jones to incur a \$341.47 meal charge at Cascone's on June 15, 2006? How many meals are included in this charge? Why couldn't the other meal participants pay for the cost of their meal? Please provide the names of the individuals who participated in the meals and relationship to the latan projects.5. How much of the charges 1. Did Mr. Ken Roberts of Schiff Hardin charge time and/or expenses to KCPL for providing services on Thursday June 25 through Sunday June 28 2009? 2. If yes, how much of the charges and/or expenses were charged to a) latan 1, latan 2, and latan Common? 3. If any charges were made to latan 1, latan 2, or Common on these dates, please provide a detailed list and description of the nature of the work performed and services provided, number of hours and hourly rate charged and a description and amount of all expenses charged. 4. Please also provide the specific hours in the day (for example 8 am through 2 pm) during each of these days that Mr. Roberts charged time and/or expenses to KCPL.
Hyneman Chuck	10/26/09	805	1. Did Mr. Carl Churchman charge time and/or expenses to KCPL for providing services on Thursday June 25 through Sunday June 28 2009? 2. If yes, how much of the charges and/or expenses were charged to a) latan 1, latan 2, and latan Common? 3. If any charges were made to latan 1, latan 2, or Common on these dates, please provide a detailed list and description of the nature of the work performed, number of hours and labor costs charged, and a description and amount of all expenses charged, either through his expense reports or the expense reports of other employees or consultants. 4. Please also provide the specific hours in the day (for example 8 am through 2 pm) during each of these days that Mr. Churchman charged time and/or expenses to KCPL.
Hyneman Chuck	10/26/09	806	For all property taxes charged to latan 1, latan 2, and latan Common, please identify the amounts charged and provide all work papers supporting the amounts charged to each of the work orders as of May 31, 2009.
Hyneman Chuck	10/26/09	807	Reference KCPL's response to DR 673, Price emails, email numbered KCPL P0033527. 1. Please describe what the term latan 2 premium payments means. 2. Please provide a copy of the worksheet referenced in the email labeled latan 2 Project Supplement worksheet.xls. 3. Please provide a copy of the explanatory letter referenced in Mr. David Evans' email.
Hyneman Chuck	10/26/09	808	
Hyneman Chuck	10/30/09	809	

Attachment 2

ER-2009-00889

Requestor	Date Received	Item No.	Question
Hyneman Chuck	11/12/09	07341	Please clarify the response to DR 0734. The question asked for late payment charges to "work orders". Since the DR question was not answered, I do not consider this DR to be complete. Please provide a corrected response as soon as possible and provide the documentation requested if appropriate. The original question and response has been duplicated below: Question No. : 0734 Please provide copies of all invoices for claims asserting late payment of invoices by KCPL. Were any charges for late payment of invoices included the Unit 1, Unit 2 or Common work orders? If yes, please provide a copy of the change order supporting the payment and identify the dollar amount paid, date paid, vendor, CEP activity code and project number. Response: KCP&L does not track claims for late payments. There were no charges for late payment of invoices included in any Unit 1, Unit 2 or common change orders.
Hyneman Chuck	11/12/09	07351	Regarding the response to DR 0735, is KCPL objecting to providing the information requested in this DR (a listing of the KCPL employees who entered the latan site on the following days with the time each individual arrived and left the site: 2/16/08, 3/5/08, 3/28/08, 5/21/08, 5/29/08, 8/25/08, 9/10/08, 11/26/08)? If so, is the reason for the objection that this data is unduly burdensome and also KCPL does not believe that this information requested by the Staff, if provided by KCPL, will result in material or relevant information to the Staff in its latan construction audit?
Hyneman Chuck	11/12/09	07831	Regarding DR 0783, provide the name of the KCPL employee as requested in this DR or state that no KCPL employee required Mr. Churchman to postpone his trip.
Hyneman Chuck	11/12/09	07861	Regarding the response to DR 0786, is KCPL saying that Mr. Easley was at the site longer than the 18 minutes on 8/3/07 or did he meet with Price and attend and speak at the meeting all in 18 minutes?
Hyneman Chuck	11/12/09	730.2	Please arrange for a meeting to discuss the reasons for and the costs associated with the latan campus relocation.
Hyneman Chuck	11/12/09	0622.313	I believe there is "The Quarterly Report Review Meeting" in Jefferson City on the 17th. Would it be possible for someone to meet with Bob and I after the CEP meeting to go over the latan cost report to show how we can trace the Alstom settlements to specific invoices?
Hyneman Chuck	11/12/09	656.2	1. Please provide copies of all Joyce Zimmerman expense reports for the period June, 2006 through September 2009. 2. Please provide copies of all receipts showing the details for any costs charged to latan 1 and latan 2 or related to latan activities. Note: 7/7/08 expense report has been received in a previous DR response.
Hyneman Chuck	11/13/09	779.1	1. Reference DR 779 Zimmerman expense report. Please provide the names of the recipients of the \$1,098.72 meal. Is this amount included in the total amount of the crane incident costs reflected in the Crane Incident tab in the U1 Cost Portfolio as of May 2009? If no, please explain why. If yes, please identify the month and line item where these costs are reflected. Please provide the names of the individual who requested the meals and the names of the individual who approved these charges to the project. 2. The receipt for the \$1098.72 meal was from the Better Wash Detail Car Wash in Gladstone, MO, but the reason for the charge states that it was food for workers, visitors on site due to crane incident. Please explain this apparent discrepancy.
Hyneman Chuck	11/13/09	817	1. Were any legal costs charged for any of the environmental construction work done at Sibley, Jeffrey or LaCygne? If yes, please provide the name of the firm, the amount of legal expense charged to the project by month and year, project number, and provide a copy of the invoice. 2. For all legal costs charged to latan 1 and latan 2 and Common, please identify the name of the firm, amount charged by month and year, and project number.
Hyneman Chuck	11/13/09	816	1. For all costs charged to latan 1 incurred by KCPL employees, please provide the amount charged by month and year, resource code, resource description, and project charged.. Please provide this data in an Excel worksheet. 2. For all costs charged to latan 1 incurred by non-KCPL employees, please provide the amount charged by month and year, by resource code, resource description and project charged. Please provide this data in an Excel worksheet.
Hyneman Chuck	11/13/09	819	1. With reference to the categories in KCPL's latan cost reports, please provide the following with regard to the four section headings of Procurement, Construction, Indirects, and Contingency: a. Please provide the definition of each section heading that KCPL developed or adopted. b. What criteria does KCPL use to classify a cost into one of these categories. c. Please provide a copy of the original source documents which describe these four categories and the documents which provide guidance on how to classify costs into these categories.
Hyneman Chuck	11/13/09	820	Please provide all costs for meals reflected on Mr. Churchman's expense reports since his first day of employment at KCPL to the current date that KCPL believes are reasonable, prudent and necessary for the construction of latan 1 and latan 2 construction projects. Please include amounts, date cost incurred, project number charged, date charged to the project, and how meal charge was necessary to completion of the project.
Hyneman Chuck	11/16/09	821	1. Please describe any business or personal relationship that existed between Carl Marano and Associates and Carl Churchman prior to Mr. Churchman's employment start date with KCPL. 2. Has Mr. Churchman worked with or for Mr. Marano on any other construction project? If so, please describe.
Hyneman Chuck	11/16/09	822	1. Please provide all criteria used by KCPL management in deciding the primary work location for each employee. 2. How does KCPL management use these criteria in determining an employee's primary work location? 3. What discretion does KCPL management have in changing the primary work location for each employee? 4. Do the criteria, determination and discretion described above apply to all employees? If not, please provide the names of the employees who these criteria, determinations and discretion do not apply to.
Hyneman Chuck	11/16/09	823	1. What is the distance in miles from the homes of each employee assigned to the latan projects and the latan construction site. Please include all personnel who regularly work at the latan site on the construction projects. 2. What is the distance in miles from the homes of each employee assigned to the latan projects and KCPL's HQ building. Please include all personnel who regularly work at the latan site on the construction projects.
Hyneman Chuck	11/16/09	824	1. Please provide a detailed description of all employee benefits in the nature of an automobile allowance, company car, company-paid limo service, or other travel related benefits for all KCPL employees who have charged any mileage to latan 1 or latan 2 (please provide a description of the benefits by employee name). 2. Please provide a copy of all company documentation of these benefits. 3. Please provide the dollar amount of a) the cost to KCPL for providing these benefits by employee name by month since September 2006, and b) the dollar amount of employee compensation these benefits reflected for each employee by name by month since September 2006. 3. Please provide a copy of all employee agreements that include a travel benefit or auto allowance as described above for all employees who have charged mileage to latan 1 or latan 2 construction projects.
Hyneman Chuck	11/16/09	070912	Please set up a meeting with Maria Jenks to follow up on discussions initiated at the 10-2-09 on-site meeting regarding data requests 0709 and 0728. Topics to address include the latan construction audits and payments to Mr. Marano (DR 728 series).
Majors Keith	11/19/09	825	Please identify the date that the latan 1 Control Budget Estimate (CBE) was presented to: 1) KCPL's Board of Directors; 2) MoPSC Staff; 3) KCC Staff; 4) The EOC; and 5) KCPL's Senior Management (if different than item 4). Please provide copies of the CBE material presented above.
Majors Keith	11/19/09	826	Please provide copies of all supporting documentation regarding the development of the amounts shown in Column B "Corporate Budget Change" for the latan 1 and latan 2 Cost Reports.
Majors Keith	11/19/09	827	Please arrange a meeting to discuss information after material has been produced.
Majors Keith	11/19/09	827	Please provide copies of the Alstom Monthly Progress Report from June 2005 to September 2009
Majors Keith	11/19/09	828	Please provide the meaning of "false projections on EAC" used on the change order contained in DR 673 pg 316.

Attachment 2

ER-2009-0089

Requestor	Date Received	Item No.	Question
Majors Keith	11/19/09	829	Please Provide copies of all documentation re: critical item # ID 73 Cost Management System - Review Stipulation & Agreement for MO & KS and establish Cost Management System in compliance with requirements as shown on page 31 of 33 of the 9/15/06 Weekly Status Update for Iatan Station.
Majors Keith	11/19/09	830	Please provide copies of all documentation re: critical item # ID 74 Prudence reporting system- develop documentation process for documenting critical decisions for the projects and establishing prudence for decisions as they occur as shown on page 31 of 33 of the 9/15/06 Weekly Status Update for Iatan Station.
Majors Keith	11/23/09	831	Please provide copies of each and every KCPL policy regarding the giving of office gifts to employees and the KCPL policy regarding its payment of such gifts during the period of June 2005 through November 2009
Majors Keith	11/23/09	832	Please provide copies of the Wednesday's Regulatory Meeting minutes from the period June 2005 through November 2009
Majors Keith	11/23/09	833	Please provide the rationale for paying Mr. Jones based on start and finish times versus the actual time working on KCPL work activities
Majors Keith	11/23/09	834	Please provide a copy of the Iatan Staffing Plan mentioned in DR 673 pg 372
Majors Keith	11/23/09	835	Please provide a copy for review of David Price's resume.
Hyneman Chuck	11/23/09	072412	DR 0724 requested the following: "Please provide a current copy of the following reports, listings: 1. KCP&L Listing of Expense Projects, and 2. Any document that lists all the project numbers and descriptions of each project that has costs charged to Iatan 1 and/or Iatan 2 and/or Iatan common construction work orders." The response provided two attachments for the appropriate listings. The file Q0724_Part 1_Expense Project Listing 2009-09.xls included a listing of all expense projects as of September 30, 2009. The file Q0724_Part 2_Iatan Projects.xls included a listing of any Iatan construction project including Iatan 1, Iatan 2, and Iatan common that incurred charges during FY2008 and YTD 2009. However, I was expecting more than the very abbreviated description provided. In past rate cases I have seen a document that actually has a description of the project and what costs should be booked to that project with the project start and completion date if applicable. The document is "Kansas City Power & Light Co Listing of Expense Projects as of December 31, 2007". The document was printed on July 14, 2008 and the 1. Did Dave Price charge KCPL for mileage to and from the Iatan construction site on a daily basis? 2. Was Mr. Price authorized to be reimbursed for mileage to and from the Iatan work site on a daily basis? If not, please explain why not. 3. If Mr. Price as VP of Construction did not charge KCPL for mileage to and from the Iatan work site on a daily basis, why is Mr. Churchman, as VP of Construction, charging KCPL for mileage to and from the Iatan construction site and the distance from his primary home address and KCPL HQ?
Hyneman Chuck	11/24/09	836	1. Please provide a copy of all severance agreements in which a part or whole of the cost was charged to any of the Iatan construction projects. 2. Please provide the rationale why this cost was charged to the construction projects as opposed to an operating expense. 3. Why did the employee(s) who received the severance payment leave KCPL?
Hyneman Chuck	11/24/09	837	Please provide a final approved sole source justification letter/memo for all vendors who worked on the Iatan construction projects since conception but whose work was not competitively bid.
Hyneman Chuck	11/24/09	838	Please describe and provide a copy of all reviews/audits of mileage reimbursement charged by KCPL employees to the Iatan construction projects. Please provide a list of all employees whose mileage charges were adjusted by KCPL. Please provide the mileage actually charged by the employee and the corrected mileage allowed. Did KCPL make any adjustments to the project costs to reflect the corrected mileage charges? If yes, please provide a copy of the journal entries. If not, please explain why not. What is the basis for the cost per mile reimbursement rate allowed by KCPL? Please describe how this rate is calculated. In any of its adjustments to mileage charges of KCPL, did KCPL attempt to determine the reason why the incorrect rate was charged? Did KCPL suspect that any of the excess mileage reimbursement sought was fraudulent?
Hyneman Chuck	11/24/09	840	Please provide a copy of each and every organizational chart for the Iatan construction projects (showing positions and names) from June 2006 through the current month.
Hyneman Chuck	11/24/09	841	Reference Brent Davis' 2/21/07 expense report. Please provide a legible copy of the corporate credit card statement for these costs.
Hyneman Chuck	11/24/09	842	Kansas City, please explain. Please also provide a legible copy of the corporate credit card statement for these costs. 1. Who is Luevano Hart? 2. Did they perform any work for Iatan construction projects? If yes, please describe the work. 3. Please provide a copy of any contract, agreement, or purchase order with this firm. 4. Please provide a copy of all invoices submitted by this firm to KCPL that was charged to the Iatan construction projects. 5. Please list all cost related to this firm that was charged to a) Iatan 1, and b) Iatan 2, including date charged, resource, project number, and amount. Please provide a detailed description of these costs and include costs incurred by KCPL employees and charged to KCPL associated with this firm.
Hyneman Chuck	11/30/09	843	Reference Article 4 Invoicing and Payment, paragraph 4.2 Travel Expenses to the Burns and McDonnell contract: 1. Paragraph 4.2 requires that all reasonable business travel related to the performance of any Services that is specifically provided for herein shall be billed at cost. A. Please provide all controls and procedures used by KCPL to ensure that Burns and McDonnell / Engineering Company employees are not paid mileage charges over and above what the incremental cost is to that employee, or to Burns and McDonnell in traveling to the Iatan construction site. B. Is KCPL aware of any Burns and McDonnell policies and procedures in place to prevent itself or any of its employees from charging mileage costs to the Iatan construction site over and above the actual cost incurred, as required by this contract? If so, please describe. 2. Paragraph 4.2 Travel Expenses also states that Burns and McDonnell and ask if any such policies or procedures have been implemented and provide the information obtained from Burns and McDonnell. 2. Paragraph 4.2 Travel Expenses also states that Burns and McDonnell will not be entitled to be reimbursed for mileage to and from the Iatan construction site. Please provide a copy of all reports to the MPSC, including affiliate transaction reports or regulatory filings that show the sale of GPP assets to KCPL. Please provide a list of all assets sold to KCPL and the assigned market value and cost to KCPL assigned to each asset by KCPL and the basis for the determination the transaction was made at the lower of cost or market value.
Hyneman Chuck	11/30/09	845	1. Please schedule a meeting on Skire costs and other computer hardware or software costs charged to project and how the amounts to charge the projects (Iatan 1, Iatan 2, and common) were determined. 2. What was the total cost of the Skire software? 3. What date was Skire put online and used for Iatan 1?
Hyneman Chuck	11/30/09	0724.11R	The DR response for 0724, which requested project descriptions, shows a project titled "Unit 1 Building Modification" for project 51-06531, but the costs in the project appear to be costs associated with the May 08 Crane Incident. Can you tell me why crane incident costs are charged to a project with this description and verify that costs in this project are crane incident costs? DR 0628, which requested life to date Iatan costs by project, identified this project as "Iatan Unit 1 Crane Damage."
Hyneman Chuck	12/1/09	0810.11R	1. Because of the following statement in response to DR 810, I will assume that no bonus payments or incentive payments were made by KCPL to any contractor or vendor employees: Since KCPL does not initiate or process payroll for contractors, the information provided relates only to KCP&L employees.2. Also, does the following statement mean that for the incentive/bonus payments made to Iatan 2, none of these charges were allocated to common plant? Could you verify this? There were no payments charged to Iatan Common Plant. 2a. If any of the charges reflected in this DR response were charged to the common plant worker, please provide a similar spreadsheet as the one provided that shows the appropriate amounts charged to Iatan 2 and common.3. Finally, in response to the bonus paid to Carl Churchman, the DR states: In February of 2009, the Board minutes reflect a Board approved payment of \$xxx (which included the \$,xxx requirement) "in recognition of his performance on KCP&L's construction projects and consistent with his employment agreement." (dollars removed). The DR asked for specific

Attachment 2

ER-2009-0089

Requestor	Date Received	Item No.	Question
Majors Keith	12/1/09	44.1	Please Update Data Request 44 for months April 2009 through October 2009 inclusive or the most recently available month. DR 44 states: For the Company's Missouri electric operations, please provide a listing and reason for each generating unit outage occurring in the period January 1, 2007 through the most current month. For each generating unit including Wolf Creek Nuclear Generating Station, please provide the following: 1) Scheduled planned outages. 2) Forced outages. 3) Partial or equivalent forced outages. 4) Budgeted scheduled/planned outages for 2007 through 2011 and identify the anticipated date and duration of these outages. For each outage, please provide the dates of the outage, duration, reason for the outage, whether the outage was total or partial, if partial provide the "de-rated" capacity generated. Please continue to provide on a monthly basis as information becomes known. (Case No. ER-2006-0314, Data Request 56; ER-2007-0291, Data Request 43)
Hyneman Chuck	12/2/09	846	Please provide a copy of all Iatan 1 contingency reports from June 2005 to the most current available.
Hyneman Chuck	12/2/09	848	1. What was the purpose of KCPL's request for Carl Marano to review the MO PSC Staff's Preliminary Report of the Staff Respecting Its Construction Audit /Prudence Review of Environmental Upgrades to Iatan 1 and Iatan Common Plant as Directed in the Missouri Public Service Commission's April 15, 2009 Orders Regarding Construction Audits And Prudence Reviews and Modified in the June 10, 2009 Orders Regarding Joint Motion to Extend Filing Dates in Case Nos. ER-2009-0089, ER-2009-0090 and HR-2009-0092? 2. Please provide a copy of Mr. Marano's findings of his review of the above document. 3. Does KCPL agree with Mr. Marano's comments? If not, please explain.
Hyneman Chuck	12/2/09	847	Please provide a copy of all workpapers, interview notes and meeting notes created by KCPL's Internal Audit department, including consultants (E&Y and Marano) that are related to the Iatan construction audits.
Majors Keith	12/3/09	06231	The response to DR 0623 shows an April 2009 adjustment of \$1,186,673.96 increasing cumulative Iatan 1 AFDC. The adjustment is labeled "Adjustments for costs transferred from Common to Iatan 1." Please provide the support for this number.
Hyneman Chuck	12/4/09	0473.1S	1. Please update this data request response for all audits (internal and external) of Iatan 2 which have been completed to date. 2. Please list all audits that are currently in existence. 3. Please list all audits that are planned for the future.
Hyneman Chuck	12/4/09	0814S	Please clarify the answer to 0814. Question: Reference KCPL's response to DRs 806 and 807. Also reference the attached tee time sheets for the 2009 Medinah Classic golf tournament (Thursday 6/25/09 Round 1 and Saturday 6/27/09, Round 3). 1. Did Messrs. Churchman and Roberts play golf in this golf tournament? If yes, please explain in detail the apparent discrepancy between the hours charged to the Iatan projects and the hours spent playing golf during this period. 2. Did Mr. Churchman schedule this trip to Chicago to play in the golf tournament? If not, why was the trip scheduled on the same days as the golf tournament? 3. Mr. Churchman's expenses report for this period shows only one meal charged to KCPL. Who paid for Mr. Churchman's other meals during this trip? 4. Why would Mr. Churchman go to Chicago to discuss a Iatan cost forecast when all the data is located in Kansas City? 5. Please provide a copy of all Iatan-related notes, reports, emails, or other documents that were created by Messrs. Churchman and Roberts during this time period. 6. Who paid for the golf tournament entry fee? If it was Mr. Churchman's, please provide a copy of all Iatan-related notes, reports, emails, or other documents that were created by Messrs. Churchman and Roberts during this time period. 7. Who paid for the golf tournament entry fee? If it was Mr. Churchman's, please provide a copy of all Iatan-related notes, reports, emails, or other documents that were created by Messrs. Churchman and Roberts during this time period. 8. Who paid for the golf tournament entry fee? If it was Mr. Churchman's, please provide a copy of all Iatan-related notes, reports, emails, or other documents that were created by Messrs. Churchman and Roberts during this time period. 9. Who paid for the golf tournament entry fee? 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Majors Keith	12/4/09	0787S	Supplemental response for 0787. Question: For each KCPL employee that charged mileage to Iatan 1 environmental upgrades or Iatan 2, please provide copies of all documentation used by the approving employee that the amount of mileage being reimbursed was consistent with KCPL's policy. Please provide home and business address for each KCPL employee at the time they requested mileage for travel to Iatan. Response: An approving employee checks to make sure a KCP&L employee had business at the site and that the mileage appears reasonable given KCP&L policy. No other documentation exists. It is unduly burdensome and will not result in material information to provide home and business address for each KCP&L employee at the time they requested mileage for travel to Iatan. Tim Rush would like to discuss this request with Staff.
Hyneman Chuck	12/7/09	0722I	Reference the attached pivot table from KCPL's response to DR 722 which shows a summary of dollars for Iatan 1 AQCS construction by cost type. For each of the cost type categories listed below, please provide a detailed description of all the types of costs included and how the amounts were calculated. For example, describe what the site allocation transfer cost category and all the types of costs included in the category. For Transfer between 1 and 2, describe what costs were transferred and how they were determined. Finally, provide a complete breakdown and description of all costs included in the \$6.1 million Misc Adj.
Hyneman Chuck	12/8/09	0842I	1. DR 0842 requested, in question 1, a description of the work performed for the Iatan project by Luevano Hart. Although the response said that "Luevano Hart Construction's web page states they are a mechanical contracting company specializing in commercial/industrial plumbing and pipe fitting services", a description of the specific work performed by Luevano Hart Construction on the Iatan project was not provided. Is KCPL unable to describe the work done on the Iatan projects by this firm? 2. DR 0842 asked, in question #5, for very specific information about the costs that were charged to the Iatan projects associated with Luevano Hart Construction. KCPL responded that "since Luevano Hart Construction is a subcontractor for Kiewit, there is no invoice detail related to Iatan Construction Project." However, Staff noted that Mr. Churchman had at least two charges on his expense reports on 2/6/09 and 5/21/09. The 5/21/09 was a semi-annual face-to-face meeting charged to Iatan. Staff needs a detailed description of these costs and any other costs that were incurred but not included in this DR response. In a meeting with Staff on 12-3-09, Maria Jenks referenced a sole source justification letter in 2008 for Marano's Iatan contract. Please provide a copy of this justification letter.
Hyneman Chuck	12/8/09	0828I	In a meeting with Staff on 12-3-09, Maria Jenks referenced a sole source justification letter in 2008 for Marano's Iatan contract. Please provide a copy of this justification letter.
Hyneman Chuck	12/8/09	0622I2	Question: In the meeting held 12-3-09, Staff asked why there was a \$5 million charge to Iatan 1 for Toshiba. Forrest Archibald agreed to check on it. Please provide a response.
Majors Keith	12/9/09	849	Please provide copies of any documentation approving Schiff Hardin to perform work that would result in charges to the Iatan 1 AQCS project in excess of levels contained in the Iatan 1 AQCS Control Budget. If no documentation exists, please identify whether Schiff Hardin received prior approval to perform work that would result in charges to the Iatan 1 AQCS project in excess of control budget amounts. If Schiff Hardin received approval to perform work that would result in charges to the Iatan 1 AQCS project in excess of control budget amounts, please identify the individual(s) with the authority to approve Schiff Hardin to perform work that would result in charges to the Iatan 1 AQCS project in excess of amounts contained in the control budget.
Majors Keith	12/9/09	850	Please provide a copy of the KCPL policy and procedure related to the acquisition of services from a sole source that could be charged to the Iatan 1 AQCS project during the period June 1, 2005 through July 31, 2006.
Majors Keith	12/9/09	851	For all Schiff Hardin LLP employees who are identified on Schiff Hardin invoices charging time to the Iatan projects, please provide a copy of his/her resume including educational degrees earned and dates awarded, and a description of specific work experience and time periods of the work experience.
Majors Keith	12/9/09	852	1. Please provide all documentation from Schiff Hardin LLP and KCPL concerning or related to increases in hourly rates charged by Schiff Hardin employees and subcontractor employees to the Iatan construction projects. 2. Please include all supporting documentation and approval documentation from KCPL's General Counsel's office. 3. If the approval documentation does not explain why the increases are justified and are fair and reasonable, please provide such a review and documentation of the review.
Hyneman Chuck	12/9/09	0829I	Question: Please provide copies of all documentation re: critical item # ID 73 Cost Management System-Review Stipulation & for Mo & Ks and establish Cost Management System in compliance with requirements as shown on page 31 of 33 of the 9/15/06 Weekly Status Update for Iatan Station. 1) When was this critical item discussed with Staff? 2) Please identify the specific document "The Iatan Cost Control Guidelines" was this the document attached to Mr. Jones' testimony in the rate case? 3) The DR asked for all documentation; please confirm all documentation was provided in response to this DR.

Attachment 2

ER-2009-0089

Requestor	Date Received	Item No.	Question
Majors Keith	12/10/09	853	Please provide a copy of all request for proposals regarding audit services, both draft and final, created and issued in 2009 that was related to any of the latan construction projects (re Schiff invoice 1400445, 7/31/09, page 16, Amanda Schermer)
Majors Keith	12/10/09	854	Please provide a copy of all data request responses provided to the Department of Energy as it relates to the latan construction projects.
Majors Keith	12/10/09	855	Please provide a copy of the latest change order log for latan 1 as maintained in SKPRE.
Majors Keith	12/10/09	856	1. Given the size of the contract and the millions of dollars paid to Schiff Hardin, please explain why KCPL Audit Services did not do an audit or review of the Schiff Hardin contract. 2. Did KCPL Audit Services propose to do an audit of the Schiff Hardin contract to KCPL management or its Board of Directors? If it did, what are the reasons why an audit was not performed? 3. Did Ernst & Young or Carl Marano or any other KCPL consultant recommend or suggest that KCPL perform an audit of the Schiff Hardin contract? If yes, what are the reasons why an audit was not performed?
Majors Keith	12/10/09	857	1. Please provide all documentation used by KCPL to verify the accuracy of the number of hours Schiff Hardin employees bill KCPL for work on the latan construction projects. 2. What is KCPL's policy and procedures for verifying the accuracy of Schiff Hardin billed hours? 3. If no documentation exists, please provide the name of the KCPL employee(s) who verify the accuracy of the number of work hours billed by Schiff on its invoices and what actions are taken to satisfy her/him that the hours charged to KCPL are accurate. 4. Did KCPL ever question or disallow any invoiced amount from Schiff Hardin? If yes, please describe the circumstances and the result of KCPL's concern.
Majors Keith	12/10/09	410.1	Reference KCPL's response to DR 410. 1. Did KCPL generate any documents in its search to show that Schiff is the only company that can provide these services? 2. What was the specific process used in its search to show that Schiff is the only company that can provide these services and what is the basis of its conclusion? 3. What RFPs did Schiff develop? 4. What contracts did Schiff form? 5. What contracts did Schiff administer? 6. What mediation did Schiff perform? 7. Why did KCPL limit its search criteria to the Midwest? 8. Was cost an issue in vendor selection? 9. How did KCPL determine that the bid legal rates and paralegal rates used by Schiff were reasonable?
Majors Keith	12/11/09	815.1	Reference the statement in DR 815 "Construction Management has developed a set of large project processes that are applicable to large construction projects." 1. Was the large project processes in effect during the construction of the latan 1 AQCS? If yes, what date was the processes a) final and b) in effect? 2. Please identify all cost of producing the large project processes by vendor (including internal KCPL costs), by date and by amount and how KCPL calculated this amount. 3. Were any of the costs of producing these processes charged to latan 1 AQCS? If yes, please provide the monthly amounts charged to the latan 1 workorder. 4. Were any of the costs of producing these processes charged to latan 2 construction? If yes, please provide the monthly amounts charged to the latan 2 workorder. 5. If the costs of producing these processes were charged to either the latan 1 or latan 2 workorders, is the ownership of these processes shared among the joint owners of the respective plants? If not, please explain. 6. Were the costs of creating these processes charged to a specific project? If not, why not. If yes, what is the shared amount?
Majors Keith	12/11/09	858	Please update DR 352 in Case No. ER-2008-0314 for Project MSC0140 costs only. Please combine in one spreadsheet all costs charged to this project in the format provided in DR 352 in the 2006 case and identify by line item each of the costs charged to MSC0140 that were transferred to and included in latan 2 workorder or not transferred to or included in latan 2 workorder. For those costs not transferred to or included in the latan 2 workorder, please describe how the costs were treated (charged to expense, charged to a deferred expense, or capitalized to another construction work order). For those costs included in latan 2 workorder, please identify on the latan 2 cost portfolio where the costs were charged. Please also indicate which costs were charged to the latan common plant work order and the basis for the allocation.
Majors Keith	12/11/09	859	1. Please provide copies of the non-change order information that identifies and explains the difference between the latan 1 AQCS CBE of \$376,803,380 and \$424,943,974 total costs incurred for the project thru May 31, 2009.
Majors Keith	12/11/09	860	1. Please identify the vendor invoices or journal entries with related amounts that create the difference between the latan 1 AQCS CBE of \$376,803,380 and \$424,943,974 total costs incurred for the project thru May 31, 2009.
Hyneman Chuck	12/15/09	0710S1	Please provide copies of each and every Schiff-Hardin Report provided to KCPL since December 18, 2007.
Hyneman Chuck	12/15/09	0622I3	Please refer to the response for 0622 I2 provided below. There are three entries for the Toshiba charge/accrual-----a debit in Jan 07, a credit in Feb 07, but another debit in Feb 07. I have a \$5.5 net charge in Unit 1 workorder. The question asked was "why" was there a charge for Toshiba. Why would the system generate an accrual for Unit 1? I have not seen an answer to this question and would like to know why Unit 1 was charged with a cost or an accrual from Toshiba. Also, since the workorder at May 09 has a debit balance for Toshiba, was there another credit made later on to net it to \$0?
Hyneman Chuck	12/16/09	861	Was KCPL offered any low interest rate financing for latan 1 or latan 2 construction? If yes, please provide the name of the lender, the amount of the financing offered, the offered interest rate, the offered financing terms and conditions, and a copy of the offer. 2. Did KCPL obtain any tax credits for latan 1 or latan 2, other than the advanced coal credit? If yes, please identify the tax credit, provide the amount of the credit, and state how the credit is, or will be, entered in KCPL's books and records.
Hyneman Chuck	12/16/09	862	Please provide the names together with the education and work experience of each and every Ernst & Young employee who has time charged to the latan 1 or latan 2 construction projects.
Hyneman Chuck	12/16/09	863	1. Please provide a copy of all correspondence between KCPL and Ernst & Young related to the latan construction audits that has not already been provided to the Staff in this case. 2. Please provide a copy of all emails between KCPL and Ernst & Young related to the latan construction audits.
Hyneman Chuck	12/17/09	0426I	Do the amounts shown on the invoices attached to the response to DR 0426 that are labeled "Direct Expenses" relate to travel-related costs? If so, the attached invoices do not include any expense receipts. Were expense receipts submitted by E&Y with the invoice? Please provide.
Hyneman Chuck	12/17/09	0420S	Please provide a copy of the contract between KCPL and Ernst & Young for audit services related the current construction activities at latan 1 and the building of latan 2 from January 7, 2009 thru current.
Hyneman Chuck	12/17/09	0428S	Please provide a copy of all invoices from Ernst & Young for work charged to the costs of the latan 1 environmental upgrade or latan 2 construction projects from October 2008 thru current.
Hyneman Chuck	12/17/09	0630.3I	Re: Responses to DR's 630.3 and 630.4 regarding payments to Sommenschein, Nath & Rosenthal, LLP. 1. The pdf voucher files attached to DR 630.4 do not appear to match the listing of vouchers provided in the response to DR 0630.3. Please explain the inconsistency. 2. No vouchers were listed or provided on either DR 630.3 or DR 0630.4 for 2008 or 2009. If there were additional vouchers charged to latan 1 AQCS, latan 2 or latan Common construction projects, please provide. If not, please explain. 3. Voucher 861111 on the list of vouchers in 630.3 says the date is 7/30/08 when the invoice is dated Sept 2007. 4. Voucher 858860 on the list of vouchers says the date is 7/30/08 when the invoice is dated Aug 2007
Hyneman Chuck	12/17/09	0732.2I	At the Campus Relocation meeting on December 7, 2009, Eric Gould, Schiff Project Controls Analyst advised that he was going to look for documentation of cost savings on the Balance of Plant contract as a result of the \$1.7 million campus relocation. Can you check if he has found anything?

Attachment 2

ER-2009-0089

Requestor	Date Received	Item No.	Question
Hyneman Chuck	12/18/09	042612	1. The cost portfolios for Units 1 and 2 show the first EY charges in May 07. I have invoices for EY work charged to Unit 1 and 2 in September 2006. Can you get an explanation for this? 2. Also the invoices prior to March 2007 do not show any categorization of the work performed as it does in later invoices. It looks like the early invoices I received were just summary sheets. Can you check and provide the detail invoices?
Hyneman Chuck	12/18/09	062251	Please arrange a meeting with Forrest Archibald for Monday, 12-21-09, to discuss the contingency log and the most current month Cost Portfolio. Please provide CD copies of the most current month cost portfolio.
Hyneman Chuck	12/18/09	06601	When reviewing the Kiewit correspondence files, letter 1082 dated May 15, 2009, mentioned a payment to Kiewit to bus its employees to a remote parking lot at Iatan, requiring them to buy or lease buses. Please arrange a short meeting the week of 12-21-09 to discuss this circumstance.
Majors Keith	12/18/09	864	Please confirm the following dates: 1) The date of the Iatan 1 turbine trip: 2/4/2009 2) The date of the Iatan 1 return to turning gear: 3/9/2009 3) The date of the Iatan 1 return to availability for in-service testing: 3/9/2009
Hyneman Chuck	12/23/09	041513	1) The response to DR 041512 provided invoices from Schiff Hardin through the invoice date of 10-31-09. If any invoices have been received subsequent to that date, please provide. 2) Please verify that KCPL did not require Schiff to provide receipts for expenses and no receipts for expenses were provided. On some invoices there is a listing of Schiff employee and the notation that a certain expense was for meals, etc. Was this the only expense documentation provided by Schiff and required by KCPL?
Majors Keith	12/28/09	062313	Referencing the original response to DR 623 for Iatan 1 AQCS AFUDC, I requested support for the "Adjustments for costs transferred from Common to Iatan 1" on the April 2009 schedule through the informal DR process. Support was provided in the response to DR 0623.1. Please schedule a meeting to discuss the mechanics of the adjustment, the origin and mechanics of the worksheets included in the response to informal data request 0623.1, and the method of calculating the AFUDC on the plant transfers.
Hyneman Chuck	12/28/09	062214	I can't find the POs for the AP00761X16072100761 (Resurfacing) and AP00834X16072100834 (JLG) change orders in the Cost Portfolio. Can you have Forrest tell me where I can find these changes in the Cost Portfolio for Unit 1?
Majors Keith	12/30/09	062313.1	In the meeting on 12-29-09 as requested in DR 0623.13, John Park referenced in May 2009 journal to transfer base costs and AFUDC from Iatan 1 and Iatan 2 construction projects to "new" Iatan Common projects. This was a follow up entry to an April 2009 entry identified in DR 06231 where costs were transferred from "old" common projects back to Iatan 1 and Iatan 2, including \$1,019,193.93 of AFUDC to Iatan 1, so as to allow for a revised transfer. Although this journal is incorporated with other activity in the May 2009 cost report provided earlier by Accounting, this transfer can't be isolated from the other monthly activity. Please provide the actual May 2009 journal entry and supporting paperwork identifying the base costs and associated AFUDC transferred from Iatan 1 construction projects to the Common projects.
Majors Keith	12/30/09	08565	Please update DR 352 in Case No. ER-2006-0314 for Project MSC0140 costs only. Please combine in one spreadsheet all costs charged to this project in the format provided in DR 352 in the 2006 case and identify by line item each of the costs charged to MSC0140 that were transferred to and included in Iatan 2 workorder or not transferred to or included in Iatan 2 workorder. For those costs not transferred to or included in the Iatan 2 workorder, please describe how the costs were treated (charged to expense, charged to a deferred expense, or capitalized to another construction work order). For those costs included in Iatan 2 workorder, please identify on the Iatan 2 cost portfolio where the costs were charged. Please also indicate which costs were charged to the Iatan common plant work order and the basis for the allocation.
Hyneman Chuck	1/5/10	865	Please provide a copy of all communications (including email communications) between Schiff Hardin LLP and/or any other consultant or law firm and KCPL that references, either directly or indirectly, the Qualifying Advanced Coal Project Investment Tax Credits Under IRC Section 48A.
Hyneman Chuck	1/5/10	866	Please provide a copy of all communications (including email communications) and agreements between KCPL and the Internal Revenue Service that references either directly or indirectly the Qualifying Advanced Coal Project Investment Tax Credits Under IRC Section 48A.
Hyneman Chuck	1/5/10	867	Please provide a copy of the original version of the Iatan Unit 2 and Common Facilities Accounting Manual with copies of all subsequent revisions.
Hyneman Chuck	1/13/10	0810.1IR 2	Previous Question: 1. Because of the following statement in response to DR 810, I will assume that no bonus payments or incentive payments were made by KCPL to any contractor or vendor employees: "Since KCPL does not initiate or process payroll for contractors, the information provided relates only to KCP&L employees." Per Hyneman: I am having difficulty understanding KCPL's response to DR 0810.1IR, part 1. Please answer the re-phrased question below with a "yes", including data, "no" or "don't know". Did KCPL make any bonus or incentive payments to contractor or vendor employees? If the answer is yes, please provide this data.
Hyneman Chuck	1/13/10	622.4	Please update DR 622 will all reports (including cost portfolios) and invoices as of December 31, 2009 for Iatan 1, Iatan 2 and common. Please update this DR on a monthly basis
Hyneman Chuck	1/13/10	639.1	Reference DR 639 and the installed video camera at the Iatan site from Earthcam, Inc. Please provide a list of all logs that reflect each and every individual or computer access to this construction site video camera. Please also include all data available for each individual access
Hyneman Chuck	1/13/10	868	Please describe each of the following charged to the Iatan 1 work order and provide the associated documents for these amounts, if available and for the Iatan 2 amounts. (see attached sheet) and why they are labeled as Unclassified. Please also provide any supporting documents for these amounts, if available and for the Iatan 2 amounts. (see attached sheet)
Hyneman Chuck	1/13/10	869	Reference KCP&L Iatan Construction Project Audit GPE Audit Services July 2007. The audit was performed primarily in March 2007. At page 4 it states that an outside contractor has been engaged to assist the Project Team in developing the project execution plan (PEP) that was adopted in June 2007. Please provide the name of this outside contractor and any other contractor/subcontractor who helped KCPL develop the PEP. Please also provide a copy of each and every invoice related to PEP work submitted by each and every contractor who assisted KCPL on the PEP.
Hyneman Chuck	1/14/10	870	1. Please provide the message related to the T&E Card Holders - Top Ten List e-mail shown on page 1961 of Data Request 673. 2. Please provide a copy of the November 2005 presentation mentioned by Maria Jenks on page 1988 of Data Request 673.
Hyneman Chuck	1/14/10	871	Please provide a copy of all notes, minutes, presentations, reports that were prepared for the meeting or presented in the weekly regulatory meetings (May 2006 through December 2009), similar to the meeting held on September 9, 2009. Please provide updates as they become available.
Hyneman Chuck	1/14/10	872	1. Please provide a copy of all notes, minutes, presentations, reports that were prepared for the meeting or presented in the weekly internal Schiff Hardin Iatan project status meetings (May 2006 through December 2009), similar to the internal Schiff weekly meeting held on September 14, 2009. Please provide updates as they become available. 2. Please provide a list of all meeting dates and length of each meeting.
Hyneman Chuck	1/14/10	840.1	Please provide each and every Iatan Project organization chart prior to the first chart provided in DR 840. Please also provide each and every organizational chart in effect after the last chart provided in DR 840. Please update this DR on a monthly basis

Attachment 2

ER-2009-0089

Requestor	Date Received	Item No.	Question
Hyneman Chuck	1/14/10	403.1	DR 403 states "Please provide the performance evaluations for each person who served in the Project Manager, Project Director, Assistant Project Director, Project Controls Manager, Construction Manager, Assurance Manager, and Procurement Manager role for the Iatan CEP construction activities." Please explain why John Forristal was not included in the employee list provided by KCPL in response to this DR and please make Mr. Forristal's evaluations available as soon as possible.
Hyneman Chuck	1/14/10	656.3	1. Please update for data for DR 656, 656.1 and 656.2 through December 31, 2009 and update on a monthly basis through the conclusion of the Iatan 2 construction audit. 2. Please include the same data for Gerald Reynolds for same period as requested in DR 656 and update through December 31, 2009 and update on a monthly basis.
Hyneman Chuck	1/14/10	856.1	1. In response to question 1 of DR 856, KCPL stated "Management and administration of the Schiff Hardin contract was reviewed in some aspects in some of our other audits previously provided in this case." Please identify each and every audit report where the management and administration of the Schiff Hardin contract was reviewed. Please also provide any comments, conclusions, or other documentation that was related to the review but was not included in the audit report. 2. Did Ernst & Young and/or Mr. Marano ever suggest to KCPL that it review the management and administration of the Schiff Hardin contract?
Hyneman Chuck	1/14/10	873	1. On January 12, 2010 the Staff received an update to DR 415 Schiff Hardin invoices for work done in September 2009. What date did KCPL receive these invoices from Schiff Hardin? 2. According to KCPL's response to DR 857, KCPL has no documentation to verify the accuracy of the number of hours Schiff Hardin employees bill KCPL for work on the Iatan construction projects. If KCPL received the Schiff invoices in December 2009 or January 2010, does KCPL rely solely on the 3-month old memory of its in-house attorneys responsible for approving Schiff invoices as to the reasonableness of the legal hours charged? If not, please explain. 3. Schiff Hardin's invoices for September 2009 show it charged KCPL over 47 work hours for each work day in September 2009 averaging over \$18,000 per day. How did KCPL verify that all of the work charged to KCPL by Schiff was authorized by KCPL and directed by KCPL to be performed? 4. Please provide a copy of all communications with Schiff Hardin LLP which include authorization and direction to Schiff Hardin to perform work for the Iatan projects. 5. Please provide a copy of Please update the data in DR 655.1 through December 31, 2009 and then on a monthly basis.
Hyneman Chuck	1/14/10	655.2	Please provide a copy of Gerald Reynolds' timesheets from June 2005 through December 31, 2009.
Hyneman Chuck	1/14/10	874	Please provide access to all data request responses posted on KCPL's CaseWorksEX website related to the current Kansas rate case, Case No. 10-KCPE-415-RTS.
Hyneman Chuck	1/18/10	IR0001	Who held the title of assistant Project Director at Iatan on 7/20/07? What was their role and responsibilities relative to the project director position?
Majors Keith	1/20/10	875	Please provide copies of Iatan daily meeting minutes after 7/20/07.
Majors Keith	1/20/10	876	Please provide a listing of the Iatan Project contracts by contract number and vendor.
Majors Keith	1/20/10	877	Please provide copies of the Iatan Project's negative float reports.
Majors Keith	1/20/10	878	Please identify the vendor that KCPL hired to monitor Alstom full time regarding QA matters.
Majors Keith	1/20/10	879	Please provide a copy of the Joint Owner Presentation Package (as noted in the JO 12/31/07 meeting minutes) and all other handouts and/or presentations discussed at all Joint Owner meetings on Iatan 1 and Iatan 2. Please update the response to this DR for current data and update on a monthly basis.
Majors Keith	1/20/10	437.1	1. Please provide a copy of the Joint Owner Presentation Package (as noted in the JO 12/31/07 meeting minutes) and all other handouts and/or presentations discussed at all Joint Owner meetings on Iatan 1 and Iatan 2. Please update the response to this DR for current data and update on a monthly basis.
Hyneman Chuck	1/21/10	880	A. Reference Michael W. Ballard's 11/30/07 expense report. 1. Why was it necessary for KCPL to incur the \$289 meal at Shaw's Crab House and the \$119.20 meal at University Club. 2. Who were the attendees at these meals and why was it necessary for KCPL to buy their meals? 3. Why was there a separate \$29 charge for the Crab House and what did KCPL purchase with these funds? 4. Why was it necessary for the construction of Iatan 2 for KCPL to incur the \$166 charge at Em Chamas on 11/20/07? 5. Did KCPL verify that Mr. Ballard actually incurred 78 incremental miles (above normal commute) when he reported to work at Iatan? 6. How did KCPL verify the accuracy of Mr. Ballard's 156 miles charged to KCPL on 11/14/07? B. Reference Michael W. Ballard's 11/10/07 expense report. 1. Why was it necessary for the construction of Iatan 2 for KCPL to incur the \$139 charge at Em Chamas on 10/30/07? 1a. Does KCPL consider the 40% tip it paid Em Chamas to be reasonable? 2. Please provide a list of and description of all \$1,223.80 in expenses in which Mr. Ballard was mistakenly reimbursed. In addition, please Please update all files for data through December 31, 2009 and then on a quarterly basis for Units 1, 2 and common in the same format.
Hyneman Chuck	1/22/10	722.1	1. Reference Schiff Hardin Invoice No. 1366223 dated 3/31/09. Please provide a copy of all receipts received by KCPL in support for Schiff's request for payment of \$72,784.43 in travel, meals and other expenses excluding the \$21,674.35 charge for professional services. Please provide the date the receipts were received. If no receipts were received to support these expenses please explain how KCPL determined the expenses were reasonable and prudent. 2. Reference Schiff Hardin Invoice No. 1357268 page 70 dated 2/28/09. Please provide a copy of all receipts received by KCPL in support for Schiff's request for payment of travel, meals and other expenses. Please provide the date the receipts were received. If no receipts were received to support these expenses please explain how KCPL determined the expenses were reasonable and prudent.
Hyneman Chuck	1/26/10	881	1. Reference Schiff Hardin Invoice No. 1366223 dated 3/31/09. Please provide a copy of all receipts received by KCPL in support for Schiff's request for payment of \$72,784.43 in travel, meals and other expenses excluding the \$21,674.35 charge for professional services. Please provide the date the receipts were received. If no receipts were received to support these expenses please explain how KCPL determined the expenses were reasonable and prudent.
Hyneman Chuck	1/26/10	882	Reference the letter from Stephen T. Easley to Contract File dated March 23, 2007 and November 15, 2007 Re: Recommendation to Award for Owner's Engineer on the Iatan Projects. 1. Please provide a copy of the KCPL and Veatch partnership agreement to develop Iatan 2 as a Merchant Power Plant in the early 1990s. 2. Please provide a copy of the document assigning development rights and partnership for Iatan 2 from KCPL to KLT Power. Please provide a copy of the accounting entry to record the sale of these rights to KLT Power and a description of how the value of the assets sold was determined. 3. Please provide a copy of the 1999 sales agreement between KCPL and KLT Inc. where KLT sold the Iatan 2 partnership interest to KCPL. Please provide a copy of the accounting entry to record the purchase of this partnership interest from KLT Power and a description of how the value of the assets purchased was determined. 4. Please provide a copy of the document assigning development rights for coal expansion at the Iatan site from KCPL to Great Plains Power (GPP) in 2001. Please provide a For each and every KCPL employee who charged labor to Iatan 2 at any time from the inception of the project through December 31, 2009, please provide the following information by employee by month: direct labor hours charged, direct labor dollars, overtime labor hours charged, overtime labor dollars charged, overhead labor dollars charged, meals charged, travel charged, FAS 87 pension benefit load, OPEB benefit load, mileage charged, bonus payments charged, additional compensation charged, Results Program dollars charged, merit pay dollars charged, Iatan 2 incentive compensation plan accrued or paid, SERP benefits accrued. Please indicate if the labor charges were Executive, Management or Non-Management. For each month, please note the KCPL department number assigned to each employee listed.
Hyneman Chuck	1/26/10	883	Reference the letter from Stephen T. Easley to Contract File dated March 23, 2007 and November 15, 2007 Re: Recommendation to Award for Owner's Engineer on the Iatan Projects. 1. Please provide a copy of the KCPL and Veatch partnership agreement to develop Iatan 2 as a Merchant Power Plant in the early 1990s. 2. Please provide a copy of the document assigning development rights and partnership for Iatan 2 from KCPL to KLT Power. Please provide a copy of the accounting entry to record the sale of these rights to KLT Power and a description of how the value of the assets sold was determined. 3. Please provide a copy of the 1999 sales agreement between KCPL and KLT Inc. where KLT sold the Iatan 2 partnership interest to KCPL. Please provide a copy of the accounting entry to record the purchase of this partnership interest from KLT Power and a description of how the value of the assets purchased was determined. 4. Please provide a copy of the document assigning development rights for coal expansion at the Iatan site from KCPL to Great Plains Power (GPP) in 2001. Please provide a For each and every KCPL employee who charged labor to Iatan 2 at any time from the inception of the project through December 31, 2009, please provide the following information by employee by month: direct labor hours charged, direct labor dollars, overtime labor hours charged, overtime labor dollars charged, overhead labor dollars charged, meals charged, travel charged, FAS 87 pension benefit load, OPEB benefit load, mileage charged, bonus payments charged, additional compensation charged, Results Program dollars charged, merit pay dollars charged, Iatan 2 incentive compensation plan accrued or paid, SERP benefits accrued. Please indicate if the labor charges were Executive, Management or Non-Management. For each month, please note the KCPL department number assigned to each employee listed.
Hyneman Chuck	1/26/10	884	Please provide the Leadership Profile, form KCHR130 for all KCPL officers and executives. Please also provide this form for all employees assigned to the Iatan construction projects.
Hyneman Chuck	1/26/10	885	1. For all accounting reclassifications made to the Iatan 2 and common workorders, please provide a very detailed description of the reclassification including why it was done, the dollar amount involved, types and descriptions of the costs reclassified and the project number affected. 2. For all "Misc Adj" entries to the Iatan work orders (for example, 600IATAB, 600IATSEPO, 600ACTTRN), please provide a very detailed description of the miscellaneous adjustment.
Hyneman Chuck	1/26/10	886	Please provide a copy of the Joint Owner Presentation Package (as noted in the JO 12/31/07 meeting minutes) and all other handouts and/or presentations discussed at all Joint Owner meetings on Iatan 1 and Iatan 2 not previously provided.
Hyneman Chuck	1/26/10	810.1	Please arrange for a meeting to discuss KCPL's response to DR 810, and all compensation payments made, compensation plans created, and benefit payments made for work related to the Iatan construction projects.
Hyneman Chuck	1/28/10	0622.4S	Please update DR 622.4 (as stated in the response) with all reports (including cost portfolios) and invoices as of December 31, 2009 for Iatan 1, Iatan 2 and common.

Attachment 2

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Requestor	Date Received	Item No.	Question
Hyneman Chuck	1/28/10	887	1. Please provide all amendments, modifications, additions and any other changes to the January 2007 Schiff Hardin-KCPL Contract. 2. Please provide a copy of any contract or agreement between Schiff Hardin and KCPL other than the contract referenced in question 1 above. 3. Has Schiff Hardin complied with Paragraph 3 of the January 2007 contract as far as the provision of receipts for out of pocket expenses? If yes, please explain how Schiff has complied with the contract requirement. If not, please provide a copy of KCPL documentation noting this non-compliance and how Schiff has corrected this non compliance. 4. Reference the hourly rates reflected in Paragraph 2 of the KCPL-Schiff Hardin contract. Please provide a copy of all Schiff's proposed annual adjustments, and the KCPL's General Counsel's approval of these adjustments prior to them taking effect. 5. Please provide a copy of all requests by Schiff Hardin to use Steve Jones as a contractor for the latan projects and a copy of all documentation by KCPL approving this request.
Hyneman Chuck	1/28/10	888	For each of the following vendors (Bridge Strategy Group, Fleischman-Hilliard, Fisher & Dority, Sonnenschein Nath & Rosenthal, Poinsett Shalton Weite Suelthaus PC, Patrick J. Hurley, Cafer Law Office, Kansas Corporation Commission), please provide 1) a comprehensive and detailed description of the specific services provided by KCPL in which the related costs were charged to the latan 2 workorder, 2) the dollar amount that is currently included in the latan 2 work order by vendor, invoice and voucher, 3) a copy of any contract or agreement with any of these vendors, documentation used by KCPL to verify completion of the service for these vendors that was charged to the latan 2 workorder, 3) a copy of any contract or agreement with any of these vendors, 4) for any vendor with a charge greater than \$100,000 please provide a copy of the Request For Proposal (RFP) or Invitation for Bid (IFB) that was issued by KCPL and all responses to these documents, 5) if no RFP or IFB was issued, please provide KCPL's sole source justification, 6) after the provision of the documents requested, please arrange for a meeting with the appropriate 1. Please provide a copy of any signed agreement and/or contract between Mr. Chris Giles and KCPL and a copy of all amendments or modification made thereto. 2. What are Mr. Giles' duties and responsibilities as it relates to KCPL as a whole and his duties and responsibilities as they related to the latan construction projects in particular. 3. Please provide the name of Mr. Giles' supervisor and the names of all individuals who Mr. Giles supervises. 4. Please provide a copy of each and every invoice or request for payment submitted by Mr. Giles to KCPL since he left the employment of KCPL, provide a complete and detailed list of all accounts where these invoiced costs were charged and provide the name(s) of each KCPL employee who approved each request for payment. 5. If not included in no. 4 above, please provide a copy of each and every expense report with all receipts submitted by Mr. Giles since he left the employment of KCPL. 6. Please provide a copy of all requests for proposals or other documents issued by KCPL for the work performed by Mr. Giles. If no RFP was issued, please explain why, provide a complete and 1. Please provide a complete and signed copy of KCPL's National Maintenance Agreement (NMA). 2. Please provide a copy of all documentation supporting the reasons why KCPL signed this Agreement 3. Please provide all studies and analysis which KCPL performed or had performed by a vendor (third party) which showed the potential costs and benefits of signing this NMA. 4. Please provide a list of all benefits KCPL expects as a result of entering into this NMA 5. Please provide a list of all costs KCPL has incurred and will incur on the latan construction projects as a result of this NMA 6. Please provide a list of all previous projects in which KCPL entered into a NMA. 7. Please provide a copy of all KCPL documentation supporting the signing of this NMA or opposing the signing of this NMA 8. Please provide a list of all KCPL employees or consultants who supported KCPL's entering into this NMA. 9. Please provide a list of all KCPL employees or consultants who opposed KCPL's entering into this NMA. 10. Please provide the name of the KCPL employee(s) who made the decision to enter into this NMA. 11. Please provide a copy of all
Hyneman Chuck	1/29/10	889	Concerning the Change Orders recently provided(a) Change Order BV-02885 (Black & Veatch PO 231047) for \$239,070.00 states walk down and commodity review for Unit #1. However the summary sheet has all costs assigned to Unit 2. Is CO for Unit 2 or Unit 1? Change Order BV-02768 (Black & Veatch PO 231047) for \$80,620.00 states to support construction reforecast. There is no support document with this CO. The summary sheet shows its for Unit 2. But it has the same PO number as the CO above.c) Change order BV03189X00023104703189 (Black & Veatch) for \$574,676 states it is for work on Unit 1 and Unit 2. The summary sheet states Unit 2 work. Please verify. Also there is no supporting documentation for this one.
Hyneman Chuck	1/29/10	890	Reference Dave Price email KCPLP0031949 and KCPLP0031950 DR 873. 1. Was Alstom back charged for a delay in providing the required corridor? In not, why was it not backcharged? If it was, please provide a copy of the latan work order journal entry that recorded this back charge. 2. Did Burns and McDonnell or any other contractor or KCPL incur increased costs as a result of any delay? If yes, please provide all correspondence reflecting a discussion of these costs, a description of how KCPL recorded these increased costs to the latan projects including project numbers and cost category or WBS codes.
Hyneman Chuck	2/3/10	891	HIGHLY CONFIDENTIALDCCI Ironworker Walk-out, work stoppage at latan on 1/11/08. On January 11, 2008, 47 Alstom workers left the job site and ceased employment on site. Alstom asked that these employees be allowed to return to the site as if employment had not been terminated until January 14, 2008 and KCPL, counter to its policy, allowed these workers to return to the site. 1. If any, please provide a copy of each and every KCPL policy that was violated as a result of KCPL's acquiescence to Alstom's request. 2. Please provide a copy of each and every agreement or contract between KCPL and any other party in which KCPL believes was violated as a result of this walkout. Please note the specific clause violated. 3. Did KCPL assess a penalty or fine or other assessment of liability to the union or any other entity for this unauthorized walkout? If yes, please provide the amount collected and the disposition of these funds. How did KCPL account for these funds (please describe and provide journal entries)? If these funds were not credited to the project, please explain why. If no monies was collected, please explain
Hyneman Chuck	2/8/10	893	Reference Steve Jones invoice# 2009-Schiff-004 received in response to DR 415. 1. Where was Mr. Jones physically located when he performed these services (e.g., home, his office, Schiff Hardin offices, latan site, KCPL offices, etc.) 2. What methods and procedures has KCPL developed and use to verify the number of hours that Mr. Jones charged to KCPL were actually spent on productive work for the latan construction project or other CEP projects? 3. Does KCPL consider Mr. Jones' description of work performed "Data Requests, Change Mgmt, Notice and Notification, White Papers, (which is exactly the same total description provided on all except 2 out of the 23 work days in this invoice) to be sufficient and meet KCPL's standards for invoice description of services provided? If not, did KCPL request supplemental description of the work performed? If not, why not. 4. Please provide a list of all data request numbers worked on by Mr. Jones during this period (as referenced in his invoices). 5. Please provide a copy of all white papers Mr. Jones worked on for KCPL during this period. 6. Has the level of detail of the description for each of the months from May 2005 through December 2009. Note - please provide in same format as the Project Safety Statistics report provided at page 7 of the December 2009 latan 2 Status Report. 2. Please provide a copy of the latan Construction Workforce Headcount for latan 1 and latan 2 construction projects (in the same format as shown on page 25 and 26 of the Dec 2009 latan 2 Status Report) for each month from May 2005 through December 2009. Please provide in Excel format.
Hyneman Chuck	2/8/10	894	1. a) Reference DR 880: In each and every subsection of DR 880 where the Staff asked why it was necessary for KCPL to incur a specific cost, please describe in very specific detail how the "business purposes of KCPL&L was advanced" from the payment of this specific cost. b) If the business purpose of KCPL was advanced, please describe in specific terms how the latan construction project benefitted from paying these meals and party charges. 2. a) Does KCPL have a general policy in how much is a reasonable dollar amount charge per person per meal when it reimburses employee meals? b) Does the reasonableness of an employee business meal charge depend on the rank of the KCPL employee (e.g. union member, administrative assistant, mid-management, officer)? If so, what are the ranges of reasonableness of these different employee classes? 3. a) Why does or did KCPL have two different employee mileage reimbursement policies, one for the Power Division and one for all other employees? b) Why were the latan construction employees allowed to use the Power Division mileage reimbursement policy during 1) Provide the change orders for the costs incurred for transportation as referenced in the meeting on January 29, 2010. 2) Provide all other pertinent documentation concerning these costs other than the documents already provided in the correspondence file. (NF240, NF1082, NF1190B, NF348)
Hyneman Chuck	2/9/10	880.1	
Majors Keith	2/10/10	895	

Attachment 2

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Requestor	Date Received	Item No.	Question
Hyneman Chuck	2/19/10	896	1. Is Carl Churchman a current employee or officer of KCPL? If yes, is KCPL aware of any future employment or association end date for Mr. Churchman, or future change of Mr. Churchman's employment status with KCPL? If Mr. Churchman is not a current employee or officer of KCPL, or has an impending change in employment status with KCPL, please provide a copy of any resignation letter, severance agreement and/or communications between Mr. Churchman and KCPL related to Mr. Churchman's employment with or separation from KCPL. 2. If Carl Churchman's employment with KCPL is terminated or soon to be terminated, is he or will he be working for or on behalf of KCPL in any capacity—Independent consultant, KCPL contractor employee, etc.? Please refer to data request 576, Case ER-2009-0089. Please update maintenance data. Please break down the data by power plant, labor and non labor and operations, maintenance, and transmission.
Herrington Karen	2/25/10	576.1	
Hyneman Chuck	3/1/10	897	Please provide a copy of each and every Iatan 2 personnel evaluations performed by or with Strategic Talent Solutions, including the evaluations discussed by Mr. Churchman and Mr. Philbin at their 9/15/09 dinner meeting at 801 Chop House in Kansas City, Missouri.
Hyneman Chuck	3/1/10	898	Who is charged with the specific responsibility of ensuring that Staff data requests related to the Iatan construction projects are answered timely and the responses address the specific questions asked in the data request in a full and complete manner? If anyone, please provide the name(s) of those individuals.
Hyneman Chuck	3/2/10	0887A	This is to add the 2008 rates for the original question below. Question No. :0887 1. Please provide all amendments, modifications, additions and any other changes to the January 2007 Schiff Hardin-KCPL Contract. 2. Please provide a copy of any contract or agreement between Schiff Hardin and KCPL other than the contract referenced in question 1 above. 3. Has Schiff Hardin complied with Paragraph 3 of the January 2007 contract as far as the provision of receipts for out of pocket expenses? If yes, please explain how Schiff has complied with the contract requirement. If not, please provide a copy of KCPL documentation noting this non-compliance and how Schiff has corrected this non-compliance. 4. Reference the hourly rates reflected in Paragraph 2 of the KCPL-Schiff Hardin contract. Please provide a copy of all Schiff's proposed annual adjustments, and the KCPL's General Counsel's approval of these adjustments prior to them taking effect. 5. Please provide a copy of all requests by Schiff Hardin to use Steve Jones as a contractor for the Iatan projects and a copy of all documentation by KCPL approving this request. 6. Please provide a copy of all amendments or modification made thereto. 7. What are Mr. Giles' duties and responsibilities as it relates to KCPL as a whole and his duties and responsibilities as they related to the Iatan construction projects in particular? 8. Please provide the name of Mr. Giles' supervisor and the names of all individuals who Mr. Giles supervises. 9. Please provide a copy of each and every invoice or request for payment submitted by Mr. Giles to KCPL since he left the employment of KCPL, provide a complete and detailed list of all accounts where these invoiced costs were charged and provide the name(s) of each KCPL employee who approved each request for payment. 10. If not included in no. 4 above, please provide a copy of each and every expense report with all receipts submitted by Mr. Giles since he left the employment of KCPL. 11. Please provide a copy of all requests for proposals or other documents supporting the informal question - In reference to the most recent response to DR 655.2 dated 2/12/2010, are there any other supporting documents, such as itemized receipts, etc. that were used to determine the validity and subsequent approval of meal expenses? --- Question 0655.2: In reference to the most recent response to DR 655.2 dated 2/12/2010, are there any other supporting documents, such as itemized receipts, etc. that were used to determine the validity and subsequent approval of meal expenses? On any document KCPL is asserting a privilege please provide a privilege log identifying the document(s) which are being redacted/privileged claimed, who the document was drafted by, who the document was received by, date of the document, how many pages, whether the document contains any nonprivileged information, and a description on the contents therein.
Majors Keith	3/3/10	0655.21	
Majors Keith	3/4/10	899	
Hyneman Chuck	3/4/10	0622.5R	Please update 2010 data for January and February with all accounting reports (including cost summaries and invoices) for Iatan 1, Iatan 2 and common. Please update this DR on a monthly basis.
Hyneman Chuck	3/4/10	0622.5R2	Please update 2010 data for January with all Project Control Reports (including Cost Portfolio, Change Order Log, and Project Control Cost Summaries) for Iatan 1, Iatan 2 and common. Please update this DR on a monthly basis.
Majors Keith	3/4/10	900	Please provide a full and complete copy of each and every invoice from SPENCER FANE BRITT & BROWNE LLP charged to the Iatan 2 construction projects. Please ensure the expense distribution is included. Please provide a copy of all the documents produced by this firm that was charged to the construction projects. Please provide a copy of any contract, purchase order or engagement letter between KCPL and this firm. Please explain why KCPL engaged the services of this firm. Please state who at KCPL supervised the performance of this contractor and also the names of the individuals who approved the invoices. Please ensure all expense charges with full documentation are included. Please ensure that all invoices clearly show the number of hours charged the rate per hour charged, and a complete description of the work provided.
Majors Keith	3/4/10	901	Please provide a full and complete copy of each and every invoice from Polinelli Shalton Flanigan Suelthaus PC charged to the Iatan construction projects. Please ensure the expense distribution is included. Please provide a copy of all the documents produced by this firm that was charged to the construction projects. Please provide a copy of any contract, purchase order or engagement letter between KCPL and this firm. Please explain why KCPL engaged the services of this firm. Please state who at KCPL supervised the performance of this contractor and also the names of the individuals who approved the invoices. Please ensure all expense charges with full documentation are included.
Majors Keith	3/4/10	902	Please provide a full and complete copy of each and every invoice from Morgan, Lewis & Bockius LLP charged to the Iatan construction projects. Please ensure the expense distribution is included. Please provide a copy of all the documents produced by this firm that was charged to the construction projects. Please provide a copy of any contract, purchase order or engagement letter between KCPL and this firm. Please explain why KCPL engaged the services of this firm. Please state who at KCPL supervised the performance of this contractor and also the names of the individuals who approved the invoices. Please ensure all expense charges with full documentation are included.
Majors Keith	3/4/10	903	Please provide a copy of each and every invoice from Midwest Litigation Services charged to the Iatan 2 or common plant project. Please include the expense distribution. Please provide a copy of all the documents by this firm relating to Iatan2 or common plant. Please provide a copy of each and every deposition taken by this firm in which the cost of the depositions were previously charged to Iatan 2 or common plant. Please provide a copy of any contract, purchase order or engagement letter between KCPL and this firm. Please explain why KCPL engaged the services of this firm. Please state who at KCPL supervised the performance of this contractor and also the names of the individuals who approved the invoices. Please ensure all expense charges with full documentation are included.
Majors Keith	3/4/10	904	Please provide a copy of each and every invoice from Gore, Perry, Gateway & Lipa charged to the Iatan 2 project. Please include the expense distribution. Please provide a copy of all the documents produced by this firm relating to Iatan 2 or common plant. Please provide a copy of each and every deposition taken by this firm in which the cost of the deposition was charged to Iatan 2 or common plant. Please provide a copy of any contract, purchase order or engagement letter between KCPL and this firm. Please explain why KCPL engaged the services of this firm. Please state who at KCPL supervised the performance of this contractor and also the names of the individuals who approved the invoices. Please ensure all expense charges with full documentation are included.

Attachment 2

ER-2009-0089

Requestor	Date Received	Item No.	Question
Majors Keith	3/8/10	905	For all the nextSource charges to the latan construction projects, please provide the following information by month from the inception of the projects through December 31, 2009. Name of the individual who worked on the project, project number, number of hours charged to the projects by project number and amount charged.
Majors Keith	3/8/10	906	1. Please describe in detail the process used by KCPL to process a Missouri Public Service Commission Staff data request related to the latan construction audits. Please include a list of all KCPL employees and job titles and contractor/consultants names and job titles involved in the process; a description of the specific stages of the process, the internal timelines established by KCPL for each stage and the required approval signatures. Please also include any flowchart that KCPL has that will aid in the understanding of this process. 2. Please describe in detail the process used by KCPL to process a Kansas Corporation Commission Staff data request related to the latan construction audits. Please include a list of all KCPL employees and job titles and contractor/consultants names and job titles involved in the process; a description of the specific stages of the process, the internal timelines established by KCPL for each stage and the required approval signatures. Please also include any flowchart that KCPL has that will aid in the understanding of this process.
Majors Keith	3/10/10	415.1	1) Please provide an updated response to DR 415 on a monthly recurring basis for additional invoices. Please provide all non-privileged documents. Please provide a privilege log for all privilege documents. Please provide partial privileged documents with a privilege log.
Majors Keith	3/10/10	885.1	Please arrange a meeting with KCPL employee John Park to discuss certain accounting entries made to the latan 2 workorder in general and KCPL's response to DR 885 in particular. The purpose of the meeting will be for the Staff to get an understanding of the descriptions provided in response to this data request as well as an understanding of the background of the events and circumstances that caused KCPL to believe a reclassification or miscellaneous journal entry was required. Please be prepared to discuss all the data in DR 885 and all Miscellaneous Adjustment entries to the latan 2 workorders.
Hyneman Chuck	3/10/10	655.2	Please update the data in DR 655.1 through December 31, 2009 and then on a monthly basis.
Hyneman Chuck	3/10/10	656.3	1. Please update for data for DR 656, 656.1 and 656.2 through December 31, 2009 and update on a monthly basis through the conclusion of the latan 2 construction audit. 2. Please include the same data for Gerald Reynolds for same period as requested in DR 656 and update through December 31, 2009 and update on a monthly basis.
Hyneman Chuck	3/10/10	840.1	Please provide each and every latan Project organization chart prior to the first chart provided in DR 840. Please also provide each and every organizational chart in effect after the last chart provided in DR 840. Please update this DR on a monthly basis.
Majors Keith	3/10/10	423	1) Please confirm that the original budget for the Sibley 3 SCR as presented to the Aquila Board of Directors of \$101 million did not include AFUDC or internal loadings. 2) Please provide the "white paper" presented to the Aquila Board of directors detailing the costs of the Sibley 3 SCR. 3) Please describe the \$101 million estimate presented to the Board of Directors. (Control Budget, definitive estimate, etc.) 4) On page 1 of the "Action Plan" in the GPES Audit Services review of the Sibley 3 Environmental Upgrades Construction, the following appears: "The Project team will develop a final cost report comparing budget to final cost." Please provide this report. 5) Please confirm that the Board approved \$101 million for the Sibley Environmental upgrades project included \$5.2 million for work on Sibley Units 1 and 2.
Majors Keith	3/10/10	907	Please provide separate pivot tables for Resource Category 862 for all balance sheet and income statement accounts from 1/1/08 through 12/31/06, 1/1/07 through 12/31/07, 1/1/08 through 12/31/08, 1/1/09 through 12/31/09. Please include the following columnar data: name, date, voucher, line description, account, project, total.
Majors Keith	3/10/10	883.1	1. Reference file Q883_Loading Rates 2006-2009.xls. Please provide a description of how each loading rate was calculated. Please also provide all data used in the calculation of the 2007 through 2009 loading rates. 2. For each and every distinct Earnings Code included in the attachments to DR 883, please provide a full and complete and very detailed description of each code. 3. For each and every distinct summary description included in the Description column of the attachments to DR 883, please provide a full, complete and very detailed description of each summary description. 4. For each and every distinct summary description included in the Class column of the attachments to DR 883, please provide a full, complete and very detailed description of each summary description. 5. Please describe the process and provide an example of how the loading rates provided DR 883 were used to calculate the loads and benefits charged to latan 2. Please select an example of an individual who charged labor to latan 2.
Majors Keith	3/10/10	893.1	1. Reference the contractor agreement between Schiff Hardin and Steve Jones provided in response to data request No. 893 received by the Staff on March 10, 2010. Please provide a copy of all requests for reimbursement of expenses and all prior authorizations of the incurrence of expenses as required by paragraph 2.4 Expenses of the agreement. Please provide these documents since inception of the agreement through the date of this data request and update on a monthly recurring basis as the expense requests and expense authorizations become available. 2. Reference the following Staff question and KCPL response to DR 893: Question 4 Please provide a list of all data request numbers worked on by Mr. Jones during this period (as referenced in his invoices). Answer: KCP&L did not create a list of data requests that Mr. Jones prepared or provided assistance. Mr. Jones, however, prepared or contributed to the response for many data requests related to the change management process. Since KCPL did not create a list of all DRs for which Mr. Jones billed KCPL and KCPL is not able to provide a list, please provide a list for each contractor/vendor/consultant/independent contractor or any individual who worked on any of the latan construction projects from January 1, 2004 through the current date of this data request and/or who provided periodic status reports or any similar reports to KCPL or to any other KCPL contractor/vendor/consultant/independent contractor. In addition to the list of entities, please provide the date of each and every report submitted from January 1, 2004 through the date of this data request and the date of each and every report scheduled to be submitted through the remainder of the projects. Please also indicate if the report covers work on latan 1, latan 2, or both
Majors Keith	3/11/10	909	1. Is Lora Cheatum currently being compensated by KCPL? If yes, please describe the services provided by Ms Cheatum. 2. If Ms Cheatum is currently providing services for KCPL or is currently being compensated by KCPL, please arrange a meeting with Staff and Ms Cheatum to discuss Procurement activities at latan and related costs charged to the latan construction projects.
Majors Keith	3/11/10	910	Has KCPL's or GPE's corporate newsletter "The Source" or any other corporate newsletter contained articles related to the latan construction projects? If yes, please provide a complete and unedited copy of each and every newsletter from January 2006 through the most recent edition. Please update as new editions become available.
Majors Keith	3/12/10	410.2	1. Reference the following statement by KCPL in response to Staff data request No. 410.1 "there are special issues that arise on regulated utility projects where specific experience and industry knowledge (even if its institutional) is required to adequately protect KCP&L's interests." Please provide a list and description of all such special issues that formed the basis of this statement. 2. What are the specific interests of KCPL does KCPL believe Schiff could protect over and above what other similar firms could protect or what KCPL employee(s) could protect? 3. Reference the following statement by KCPL in response to Staff data request No. 410.1 "KCP&L also sought out construction law groups that had significant and specialized experience in project controls in the context of building base load generation". Please describe the process described by KCPL as "sought out". Did KCPL contact any firms? Did KCPL select bids from firms? If yes, who are the firms and please provide correspondence with these firms. 4. Question 2 in DR 410.1 asked KCPL for the "specific process used in its search to show that Schiff is the only company

Attachment 2

ER-2009-0089

Requestor	Date Received	Item No.	Question
Majors Keith	3/12/10	851.1	Reference KCPL's response to DR 851, Schiff Hardin resumes. 1. Please provide a list of all educational degrees, date earned, and educational institution attended for Ned Markey that was not included in the copy of Ned Markey's resume that was provided. 2. Please provide a list of all professional certifications earned by Ned Markey. 3. Please provide a list of all legal and or paralegal education and legal or paralegal training completed by Ned Markey. Please list the date completed and the institution that provided the training. Is Ned Markey an employee of Schiff Hardin? If yes, when did he begin employment with the firm? If not, please name the employer.
Majors Keith	3/12/10	911	Please provide a copy of all invoices from all contractors/vendors/independent contractors/outside consultants and former employees who 1) performed paralegal services for KCPL or for any of its outside consultants (except Schiff Hardin) and 2) the invoiced charges were for work related to any of KCPL's CEP projects during the period 2005 through the current date of this data request.
Majors Keith	3/12/10	887.1	1. DR 887 asked for all amendments, modifications, additions and any other changes to the January 2007 Schiff Hardin contract. KCPL responded that "no substantive provision of the Contract for Legal Services has been altered." Since the Staff did not ask for only what KCPL defines as "substantive" amendments, modifications, and additions, please provide all inclusive of substantive and non substantive amendments, modification, additions and any other changes. If no changes have been made since Jan. 2007, please make notation of that. 2. Please provide a copy of all correspondence (including emails and documents) between KCPL and Steve Jones and Steve Jones and KCPL, KCPL and Schiff Hardin and Schiff Hardin and KCPL related to Mr. Jones' employment as a KCPL employee, Mr. Jones' contract and employment as an independent contractor for KCPL, and Mr. Jones' employment with Schiff Hardin as an employee or independent contractor. 3. What date did KCPL first learn that Mr. Jones was going to work for Schiff Hardin instead of KCPL? What date did Mr. Jones cease being a KCPL
Majors Keith	3/12/10	851.2	Reference KCPL's response to DR 851, Schiff Hardin resumes. 1. Please provide a list of all educational degrees, date earned, and educational institution attended for Ms Van Winkle that was not included in the copy of Ms Van Winkle's resume that was provided. 2. Please provide a list of all professional certifications earned by Ms Van Winkle. 3. Please provide a list of all legal education and legal training completed by Ms Van Winkle. 4. What date did Ms Van Winkle start employment with Schiff Hardin? 5. Is Ms Van Winkle a current employee of Schiff Hardin? If not, when did Ms Van Winkle cease being an employee of Schiff Hardin.
Majors Keith	3/12/10	851.3	Reference KCPL's response to DR 851, Schiff Hardin resumes. 1. Please provide a list of all educational degrees, date earned, and educational institution attended for Mr. Gould that was not included in the copy of Mr. Gould's resume that was provided. 2. Please provide a list of all professional certifications earned by Mr. Gould. 3. Please provide a list of all legal education and legal training completed by Mr. Gould. 4. Please provide a list of all Project Controls education and training completed by Mr. Gould. 5. Please provide a list of all Project Management education and training completed by Mr. Gould. 6. Please provide a copy of all articles, books, or any professional publications authored by Mr. Gould. 7. What date did Mr. Gould start employment with Schiff Hardin? 8. What are the names of the previous firms in the construction, construction-related or legal industry in which Mr. Gould held employment? 9. What are the dates of his employment with these firms?
Majors Keith	3/12/10	881.1	Reference KCPL response to DR 881. Is KCPL aware of any other vendor or consultant who incurred airline travel expenses, lodging expenses and meal expenses and charged these expenses to KCPL and KCPL paid these expenses without requiring the vendor or consultant to provide receipts for these expenses? If yes, please provide the name(s) of these vendors or consultants and explain why no expense documentation was required. If no, please provide all the reasons why KCPL is treating Schiff Hardin differently from all its other vendors and or consultants.
Majors Keith	3/12/10	942	1. Please provide a copy of all memos or other correspondence between KCPL and Schiff Hardin in which KCPL former employee Mike Ballard was the subject of the communications. (RE Schiff Invoice for Dec 2007, Eric Gould work on 12/7/07)2. Please provide a copy of all Executive Oversight Committee Reports that were drafted by Schiff Hardin. If these reports have previously been provided, please indicate which reports were drafted by Schiff Hardin. (Eric Gould work Dec 14 - 17 2007)3. Please explain the reasons for Schiff Hardin's involvement with issues related to the actions of former KCPL employee Mike Ballard. Reference Schiff Hardin December 2007 invoice dated 3/19/08.
Majors Keith	3/12/10	710.1	1) The following Schiff-Hardin Status Reports have been given to Staff: Report Dated November 24, 2008, Report Dated March 27, 2009, Report Dated August 28, 2009. Please confirm that no other status reports on the Iatan Construction project exist that were produced or contributed to by any Schiff-Hardin employee or subcontractor. 2) If such reports do exist, please provide them pursuant to Staff's original data request. 3) Please update this data request for any subsequent status reports produced or contributed to by any Schiff-Hardin employee or subcontractor.
Hymeman Chuck	3/16/10	0622.4I	Please provide the Iatan 1, Iatan 2 and Common voucher detail for the months of July through September 2009 similar to that provided in the response to DR 0622S. Note that this will complete the provision of Iatan-related voucher detail through December 2009. Voucher detail/invoices were provided by CEP Accounting through June 2009 on 0622 and 0622S and for October through December 2009 on 622.4. Voucher detail, and cost summaries for months beginning January 2010 will be provided in responses to recurring DR 0622.5R.