

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

In the Matter of the Application of Kansas City )  
Power & Light Company for Approval to Make ) **File No. ER-2010-0355**  
Certain Changes for Electric Service to Continue ) **Tariff No. JE-2010-0692**  
the Implementation of Its Regulatory Plan )

In the Matter of the Application of KCP&L )  
Greater Missouri Operations Company for ) **File No. ER-2010-0356**  
Approval to Make Certain Changes for Electric ) **Tariff No. JE-2010-0693**  
Service to Continue the Implementation of Its )  
Regulatory Plan )

**STAFF'S REQUEST FOR A SPECIAL MASTER**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff), by and through counsel, and for its request to the Missouri Public Service Commission (Commission) to appoint a Special Master in the above referenced matter, respectfully states as follows:

1. On August 18, 2010, the Commission issued an Order *Approving Nonunanimous Stipulation and Agreement, Setting Procedural Schedule, and Clarifying Order Regarding Construction Audit and Prudence Review*. This Order set forth monthly status conferences to address various issues in these proceedings at which the Staff appeared and participated.

2. Staff requests the Commission appoint a Special Master to conduct in-camera reviews to determine whether documents being withheld or redacted by Kansas City Power & Light Company (KCPL) and/or KCP&L Greater Missouri Operations (GMO) appropriately qualify for immunity from discovery under the attorney-client privilege or the attorney work product doctrine/immunity. In at least one instance each KCPL/GMO has asserted accountant-client privilege, insurer-insured privilege and arbitrator/mediator privilege. The Special Master should also determine which portions of documents being withheld should be released if the attorney-client privilege or attorney work product doctrine does not apply to the entire document.

3. Staff requests that the Special Master also determine if the information KPCL and/or GMO redacted from discovery answers was within the appropriate scope of the attorney-client privilege, work product doctrine, or other privilege or immunity.

4. Staff suggests that the rulings and determinations of the Special Master should be final and binding on the parties.

5. Staff asserts that the most appropriate person to fulfill the role of a Special Master would be one of the Commission's regulatory law judges, but not one of the regulatory law judges assigned to Case Nos. ER-2010-0355 or ER-2010-0356.

6. Staff requests that any data request response for which a party provided an answer containing redacted portions of documents or withheld documents on the basis of attorney-client privilege and/or attorney work product doctrine be provided to the Special Master. The party would provide directly to the Special Master a copy of the documents in their original form and a copy in of the document in the form in which the party answered the data request. The Special Master will determine whether the redactions or complete omissions are appropriate or not protected by either the attorney-client privilege, attorney work product doctrine, or other privilege or immunity and issue an Order reflecting his or her conclusions. As stated above, the Special Master's ruling will be binding on the parties and the parties shall comply with the Special Master's ruling.

7. Staff's request for a special master is limited to the Special Master reviewing only information withheld on the basis of the attorney-client privilege, attorney work product doctrine, or other privilege or immunity. All other discovery disputes, for example relevance, will follow the procedures as governed by Statute, 4 CSR 240-2.090(8), and Commission Orders.

8. Staff requests that a Special Master be appointed so that any information withheld that does not qualify, in particular, under the attorney-client privilege or attorney work product doctrine can be made available to Staff for use in these proceedings. Staff believes that such information can be made available in time for Staff to make efficient and prudent review of the material required for the pending cases.

9. Staff requests that the Special Master review the material relevant to the data requests listed in Attachment A and the material relevant for all additional data requests that KCPL/GMO respond to by objection, claiming attorney-client privilege, work product doctrine, and/or other privilege or immunity.

10. Missouri Supreme Court Rule 57.01(c)(3) states “[i]f a privilege or the work product doctrine is asserted as a reason for withholding information, then without revealing the protected information, the objecting party shall state information that will permit others to assess the applicability of the privilege or work product doctrine.” (Missouri courts have addressed Commission access to attorney-client and proprietary information) *State ex rel. Southwestern Bell Tel. Co. v. Public Serv. Comm’n*, 645 S.W.2d 44, 55-56 (Mo. App. W.D. 1982); *State ex rel. Utility Consumers Council of Mo. v. Public Serv. Comm’n*, 562 S.W.2d 688, 694, 696 (Mo. App. St.L. D. 1978).

11. While KCPL/GMO provided privilege logs for some data requests responses in which they asserted attorney-client privilege, attorney work product doctrine or another privilege, they have not provided a privilege log for all data requests in which a privilege or immunity is asserted by them. Staff requests that any and all data requests in which a party claims either the attorney-client privilege and/or work product doctrine or any other privilege or

immunity, a privilege log be provided identifying what privilege or doctrine/immunity is being asserted and for what section of the document.

**WHEREFORE**, Staff respectfully requests the Commission appoint a Special Master in the above referenced cases to handle all discovery requests in which any privilege or immunity, but in particular either attorney-client privilege or the attorney work product doctrine, is being asserted.

Respectfully submitted;

**/s/ Jaime N. Ott**

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## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 1st day of November, 2010.

/s/ Jaime N. Ott

**DATA REQUESTS FOR SPECIAL MASTER TO REVIEW**

1. Staff requests that the Special Master review the following data requests in which KCPL and GMO have asserted attorney-client privilege and/or attorney work product privilege:

DR #	Originated Case #	Date	Request	Privilege Log <sup>1</sup> Status
337	ER-2009-0089	01/14/2009	Please provide copies of all documents related to the selection of Burns & McDonnell as the design and engineering contractor for the latan 1 environmental upgrades and construction of latan 2. Please include documentation received by all vendors considered to provide design and engineering services for the latan 1 environmental upgrades and construction of latan 2.	KCPL/GMO will provide a privilege log.
339	ER-2009-0089	01/14/2009	Please provide copies of all documents related to the negotiation of the contract with Burns and McDonnell for design and engineering services for the latan 1 environmental upgrades and construction of latan 2, including draft contracts and proposed contract provisions.	KCPL/GMO provided a privilege log.
342	ER-2009-0089	01/14/2009	Please provide copies of any documentation regarding the Schiff Hardin evaluation of the Burns & McDonnell Contract for design and engineering services for the latan 1 environmental upgrades and construction of latan 2.	KCPL/GMO provided a privilege log.
348	ER-2009-0089	01/14/2009	Copies of all documents related to the selection of Alstrom as prime contractor for the construction of the latan 1 & 2 air quality control system and latan 2 boiler.	KCPL/GMO will provide a privilege log.
350	ER-2009-0089	01/14/2009	Please provide copies of all documents related to the negotiation of the contract with Alstrom for construction of the latan 1 & 2 air quality control system and latan 2 boiler.	KCPL/GMO provided a privilege log.
353	ER-2009-0089	01/14/2009	Copies of any documentation regarding the Schiff Hardin evaluation of the Alstrom Contract related to the construction of the latan 1 & 2 AQCS and latan 2	KCPL/GMO provided a privilege log.

<sup>1</sup> Missouri Supreme Court Rule 57.01(c)(3) states “[i]f a privilege or the work product doctrine is asserted as a reason for withholding information, then without revealing the protected information, the objecting party shall state information that will permit others to assess the applicability of the privilege or work product doctrine.”

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			boiler.	
358	ER-2009-0089	01/14/2009	Copies of all documents related to the selection of Alstrom as prime contractor for the Balance of Plant work at Iatan.	KCPL/GMO provided a privilege log.
360	ER-2009-0089	01/14/2009	Please provide copies of all documents related to the negotiation of the contract with Kiewit for the Balance of Plant work at Iatan.	KCPL/GMO provided a privilege log.
360S	ER-2009-0089	01/14/2009	Please provide copies of all documents related to the negotiation of the contract with Kiewit for the Balance of Plant work at Iatan.	KCPL/GMO will NOT provide a privilege log claiming the underlying documents are too voluminous.
363	ER-2009-0089	01/14/2009	Copies of any documentation regarding the Schiff Hardin evaluation of the Kiewit Contract related to the Balance of Plant work at Iatan.	KCPL/GMO provided a privilege log.
368	ER-2009-0089	01/14/2009	Copies of all documents related to the selection of Kissick to provide foundation work for Iatan 1 & 2.	KCPL/GMO will provide a privilege log.
370	ER-2009-0089	01/14/2009	Please provide copies of all documents related to the negotiation of the contract with Kissick for foundation work for Iatan.	KCPL/GMO provided a privilege log.
373	ER-2009-0089	01/14/2009	Copies of any documentation regarding the Schiff Hardin evaluation of the Kissick Contract related to the foundation work at Iatan.	KCPL/GMO provided a privilege log.
394 (53)	ER-2009-0090 (EO-2010-0259)	01/14/2009	Please identify by Control Budget Estimate (CBE) line item the amount included for the work to be performed on Iatan 2 under the Burns & McDonnell contract.	KCPL/GMO will only provide privilege log for invoices.
397 (56)	ER-2009-0090 (EO-2010-0259)	01/14/2009	Please provide a copy of the Iatan 2 Project Definition Report.	KCPL/GMO will NOT provide a privilege log claiming the underlying documents are too voluminous.
398 (57)	ER-2009-0090 (EO-2010-0259)	01/14/2009	Please provide a copy of the KCP&L Policies and Procedures Manual mentioned in section 5.1.1 of the Iatan Construction Project Execution Plan.	KCPL/GMO will only provide a privilege log for invoices.
398S <sup>2</sup>	ER-2009-0089	01/14/2009	Please provide a copy of the KCP&L Policies and Procedures Manual mentioned in section 5.1.1	KCPL/GMO will NOT provide a privilege log

<sup>2</sup> "S" means supplemental data request.

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			of the Iatan Construction Project Execution Plan.	claiming the underlying documents are too voluminous.
411	ER-2009-0089	01/14/2009	Copies of all documents related to the selection of Schiff Hardin to provide independent oversight and Project Controls advice for Iatan 1 & 2.	KCPL/GMO provided a privilege log.
413	ER-2009-0089	01/14/2009	Please provide copies of all documents related to the negotiation of the contract with Schiff Hardin for independent oversight and Project Controls advice for Iatan 1 & 2.	KCPL/GMO provided a privilege log.
415I <sup>3</sup>	ER-2009-0089	01/14/2009	Please provide an unedited copy of all invoices from Schiff Hardin for work charged to the costs of the Iatan 1 or 2.	KCPL/GMO provided a privilege log.
415I2	ER-2009-0089	01/14/2009	Please provide an unedited copy of all invoices from Schiff Hardin for work charged to the costs of the Iatan 1 or 2.	KCPL/GMO provided a privilege log.
415S	ER-2009-0089	01/14/2009	Please provide an unedited copy of all invoices from Schiff Hardin for work charged to the costs of the Iatan 1 or 2.	KCPL/GMO provided a privilege log.
415.1	ER-2009-0089	03/10/2010	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.	KCPL/GMO provided a privilege log.
418	ER-2009-0089	01/14/2009	Please provide copies of all recommendations, evaluations, assessments, audits, and advice provided to KCPL from Schiff Hardin regarding Schiff Hardin's independent review and reporting of the project controls for the Iatan 1 and 2 construction projects.	KCPL/GMO will NOT provide a privilege log claiming the underlying documents are too voluminous.
418R <sup>4</sup>	ER-2009-0089	01/14/2009	Please provide copies of all recommendations, evaluations, assessments, audits, and advice provided to KCPL from Schiff Hardin regarding Schiff Hardin's independent review and reporting of the project controls for the Iatan 1 and 2 construction projects.	KCPL/GMO provided a privilege log.
422	ER-2009-0089	01/14/2009	Copies of all documents related to the selection of Ernst & Young to	KCPL/GMO will provide a privilege

<sup>3</sup> "I" means informal data request.

<sup>4</sup> "R" means recurring data request.



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			provide audit services for Iatan 1 environmental upgrade or Iatan 2 construction projects.	log.
424	ER-2009-0089	01/14/2009	Please provide copies of all documents related to the negotiation of the contract with Ernst & Young for audit services for Iatan 1 environmental upgrade or Iatan 2 construction projects.	KCPL/GMO will provide a privilege log.
427	ER-2009-0089	01/14/2009	Copies of any documentation regarding the Schiff Hardin evaluation of the Ernst & Young Contract related to audit services at Iatan.	KCPL/GMO will provide a privilege log.
430	ER-2009-0089	01/14/2009	Please provide copies of all documentation evaluating the decision to initiate construction and enter into significant procurement contracts for Iatan 1 and 2 before design was substantially completed.	KCPL/GMO provided a privilege log.
433	ER-2009-0089	01/14/2009	Please provide copies of all reports and presentations Schiff Hardin provided to KCPL's senior management, Executive Oversight Committee (EOC), and project personnel.	KCPL/GMO will provide a privilege log.
433R	ER-2009-0089	01/14/2009	Please provide copies of all reports and presentations Schiff Hardin provided to KCPL's senior management, Executive Oversight Committee (EOC), and project personnel.	KCPL/GMO will provide a privilege log.
436	ER-2009-0089	01/14/2009	Please provide copies of all documentation provided to the Executive Oversight Committee (EOC) since the group's inception.	KCPL/GMO will provide a privilege log.
436R	ER-2009-0089	01/14/2009	Please provide copies of all documentation provided to the Executive Oversight Committee (EOC) since the group's inception.	KCPL/GMO will provide a privilege log.
439.2	EO-2010-0259	07/01/2010	Please provide a list of all entities that have access to Sharepoint. Please arrange a meeting with Staff for a demonstration of the Sharepoint. During this demonstration, the Staff would like to examine all sole source contracts on Sharepoint. Please provide a copy of the operating manual for Sharepoint.	KCPL/GMO will NOT provide a privilege log claiming the underlying documents are too voluminous.
471	ER-2009-0089	01/14/2009	Please provide copies of any and all documentation created relative to concerns or other statements brought to KCPL's attention through its hotline, whistleblower, or employee internal complaint	KCPL/GMO will provide a privilege log.

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			process relative to issues regarding the current latan 1 and 2 construction projects.	
471R	ER-2009-0089	01/14/2009	Please provide copies of any and all documentation created relative to concerns or other statements brought to KCPL's attention through its hotline, whistleblower, or employee internal complaint process relative to issues regarding the current latan 1 and 2 construction projects.	KCPL/GMO will provide a privilege log.
490	ER-2009-0089	01/14/2009	Please provide copies of all the documentation supporting the development, review, analysis and approval of the contingency and executive contingency included in the control budget estimate for environmental upgrades at latan 1.	KCPL/GMO provided a privilege log.
622.5 R	EO-2010-0259	06/04/2010	Please update John Park and Forrest Archibald cost data monthly pursuant to prior agreement.	KCPL/GMO provided a privilege log.
630.3	ER-2009-0089	07/31/2009	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 Sonnenschein Nath & Rosenthal, LLP. 2. Please also provide a detailed description of the work performed by this firm for KCPL that was charged to the latan construction projects.	KCPL/GMO will NOT provide a privilege log claiming the underlying documents are too voluminous.
630.4	ER-2009-0089	09/03/2009	Please provide a copy of each and every invoice submitted by Sonnenschein Nath & Rosenthal, LLP and charged to the latan 1 workorder, latan 2 work order or latan common plant work order. Please also include the payment voucher showing where the invoiced costs were charged.	KCPL/GMO provided a privilege log.
631	ER-2009-0089	06/17/2009	1. Please provide a copy of the document titled "latan 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 latan Joint Owners meeting. 3. Please provide copies of computer disks of all invoices given to the Kansas Corporate Commission regarding their investigation into latan 1 and Common Facilities.	KCPL/GMO provided a privilege log.
637.1	ER-2009-0089	09/10/2009	Please provide a copy of each and	KCPL/GMO

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			every communication between GPE/KCPL and STS related to the latan construction projects, including but not limited to emails, letters, notes of phone conversations, etc.	provided a privilege log.
650	ER-2009-0089	07/24/2009	Please provide the Staff with access to the latan Joint Owners Sharepoint website.	KCPL/GMO will NOT provide a privilege log claiming the underlying documents are too voluminous.
673	ER-2009-0089	07/30/2009	Please provide for review all David Price e-mails either received or sent while in the employ of KCPL.	KCPL/GMO provided a privilege log..
673.1	ER-2009-0089	09/25/2009	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.	KCPL/GMO provided a privilege log.
677	ER-2009-0089	07/30/2009	Information re: 4/3-4/08 Chicago meeting w/ Charles Whitney (Duane Morris, LLP) re: latan II construction issues see attached	KCPL/GMO will provide a privilege log.
710	ER-2009-0089	08/17/2009	Please provide copies of each and every Schiff-Hardin Report provided to KCPL since December 18, 2007.	KCPL/GMO provided a privilege log.
710S	ER-2009-0089	08/17/2009	Please provide copies of each and every Schiff-Hardin Report provided to KCPL since December 18, 2007.	KCPL/GMO provided a privilege log.
710S1	ER-2009-0089	08/17/2009	Please provide copies of each and every Schiff-Hardin Report provided to KCPL since December 18, 2007.	KCPL/GMO provided a privilege log.
710.1S	ER-2009-0089	08/17/2009	Please provide copies of each and every Schiff-Hardin Report provided to KCPL since December 18, 2007.	KCPL/GMO provided a privilege log.
715.1	ER-2009-0089	09/24/2009	Please provide a copy 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.	KCPL/GMO provided privilege log.
720	ER-2009-0089	08/20/2009	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	KCPL/GMO provided a privilege log.

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			<p>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.</p>	
817	ER-2009-0089	11/13/2009	<p>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.</p>	<p>KCPL/GMO provided a privilege log.</p>
843	ER-2009-0089	11/30/2009	<p>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 latan 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 latan construction site over and above the actual cost incurred, as required by this contract? If so, please describe. If not, please contact 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</p>	<p>KCPL/GMO will NOT provide a privilege log claiming the underlying documents are too voluminous.</p>

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			Burns and McDonnell will not be entitled to be reimbursed for mileage expenses associated with travel to the Site for its personnel that receive the per diem discussed in Article 4.3. Please describe all controls and procedures used by KCPL to ensure compliance with this contract requirement.	
853	ER-2009-0089	12/10/2009	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)	KCPL/GMO will NOT provide a privilege log claiming the underlying documents are too voluminous.
863	ER-2009-0089	12/16/2009	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.	KCPL/GMO will NOT provide a privilege log claiming the underlying documents are too voluminous.
865	ER-2009-0089	01/05/2010	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.	KCPL/GMO provided a privilege log.
865R	ER-2009-0089	01/05/2009	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.	KCPL/GMO provided a privilege log.
871	ER-2009-0089	01/14/2010	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.	KCPL/GMO provided a privilege log.
872	ER-2009-0089	01/14/2010	1. Please provide a copy of all notes, minutes, presentations, reports that were prepared for the	KCPL/GMO will provide a privilege log.

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			meeting or presented in the weekly internal Schiff Hardin latan 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.	
873	ER-2009-0089	01/15/2010	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 latan 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 latan projects. 5. Please provide a copy of the current budget and copies of all previous budgets created by KCPL or Schiff Hardin for Schiff Hardin work on the latan construction projects. 6. Does Mr. Reynolds monitor and approve Schiff Hardin's project controls and other non-legal work as well as Schiff Hardin's legal work for KCPL? If not, who at KCPL provides these functions? Does the individual(s) who perform these	KCPL/GMO will provide a privilege log.

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			functions participate in the Schiff Hardin invoice approval process?	
888	ER-2009-0089	01/28/2010	For each of the following vendors (Bridge Strategy Group, Fleischman-Hilliard, Fisher & Dority, Sonnenschein Nath & Rosenthal, Polsinelli Shalton Welte 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 invoice over \$5,000 and other supporting 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 KCPL employees to discuss the types of services performed by these vendors and charged to latan 2.	KCPL/GMO provided a privilege log.
899	ER-2009-0089	03/04/2010	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.	KCPL/GMO will NOT provide a privilege log claiming the underlying documents are too voluminous.
900.1	EO-2010-0259	03/31/2010	Reference DR 900. Please comply with Missouri Rules of Civil Procedure, specifically 57.01(3).	KCPL/GMO provided a privilege log.
902.1	EO-2010-0259	03/31/2010	Reference DR 902. Please comply	KCPL/GMO

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			with Missouri Rules of Civil Procedure, specifically 57.01(3).	provided a privilege log.
963	EO-2010-0259	06/08/2010	1. What is KCPL's policy or procedures for conduction exit interviews? 2. Please provide a list of all exit interviews over from February 2007 through May 2010.	KCPL/GMO will provide a privilege log.
964	EO-2010-0259	06/08/2010	1. Please provide a list of and a copy of all sole source recommendation letters related to work on the latan construction projects from the inception of the project through May 2010 2. Please provide a list of and a copy of all sole source justification letters related to work on the latan construction projects from the inception of the project through May 2010.	KCPL/GMO will provide a privilege log.