

**Majors, Keith**

**From:** Rush Tim [Tim.Rush@kcpl.com]  
**Sent:** Friday, November 20, 2009 11:52 AM  
**To:** Majors, Keith  
**Cc:** Schallenberg, Bob; Hyneman, Chuck; Davidson Christine  
**Subject:** FW: Data Request Objection List  
**Attachments:** 2008\_MO\_Rate\_Case\_DR Objection List (Majors).xls

**FILED**

MAY 6 2010

Missouri Public  
Service Commission

Keith,

Attached is the response to your request to review certain Data Requests for potential errors. We have added a column that describes our interpretation of the data request. Many of the data requests where an objection was made were subsequently responded to. Additionally, some of the data requests that asked for a review in our offices were also subsequently responded.

I would be happy to go over any these for clarification or any other reason.

I hope you have a good weekend and a very happy Thanksgiving Holiday.

Tim Rush  
 816 556-2344

**From:** Davidson Christine  
**Sent:** Friday, November 20, 2009 9:42 AM  
**To:** Rush Tim  
**Subject:** FW: Data Request Objection List

Here is a listing with my comments. Note that the file has two tabs, one for KCPL and one for GMO. I have tried to indicate on each line as appropriate when a "S" response completed the provision of data requested in the original DR.

Chris Davidson  
 Regulatory Affairs  
 816-654-1666

**From:** Majors, Keith [mailto:keith.majors@psc.mo.gov]  
**Sent:** Tuesday, November 03, 2009 10:58 AM  
**To:** Davidson Christine  
**Cc:** Schallenberg, Bob; Hyneman, Chuck  
**Subject:** Data Request Objection List

Chris,  
 I have been instructed to send you a list of data requests that KCPL has objected to or that Staff considers non-responsive, updated as of today. There are two files, one for the 89 case and the other for the 90 case. If there are any obvious errors, please contact me.

Thank you

Keith A. Majors  
 Utility Regulatory Auditor  
 Missouri Public Service Commission  
 Fletcher Daniels State Office Building  
 Room G8  
 615 East 13th Street  
 Kansas City, MO 64106

4/28/2010

Staff Exhibit No. 10  
Date 4-29-10 Reporter KF  
File No. EO-2010-0259

Phone: 816-889-3509

Email: [keith.majors@psc.mo.gov](mailto:keith.majors@psc.mo.gov)

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4/28/2010

Received from Keith Majors 11-3-09

"List of data requests that KCPL has objected to or that Staff considers non-responsive"

DR #	Objection Type (b)	Official Objection?	Date (a)	Status (a) per Staff	KCPL Comments
ER-2009-0089					
336	latan 2 Information	Y	1/23/2009	Response on 2/3/2009	2-3-09 response was for latan 1 information
337	latan 2, Attourney Client	Y	1/23/2009	Response on 2/2/2009	2-3-09 response was for latan 1 information
339	Attourney Client	Y	1/23/2009	Response on 3/30/2009, DR 339 S	latan 2 information subsequently provided in response to supplemental DR 339S. This completed provision of all data requested in the original DR.
341	latan 2	Y	1/23/2009	Response on 4/3/2009, DR 341 S	Response on 2-2-09 for latan 1; 4-3 response was for latan 2. This completed provision of all data requested in the original DR.
342	Attourney Client	Y	1/23/2009	Response on 2/3/2009, unprivileged documents made available	
343	latan 2	Y	1/23/2009	Response on 2/2/2009	2-2-09 response was for latan 1 information
348	Attourney Client	Y	1/23/2009	Response on 2/3/2009	2-3-09 response was for unprivileged information
350	Attourney Client	Y	1/23/2009	Response on 4/6/2009, DR 350 S	DR 350S refers to response for DR 348
353	Attourney Client	Y	1/23/2009	Response on 2/3/2009, unprivileged documents made available	
358	Attourney Client	Y	1/23/2009	Response on 2/3/2009	2-3-09 response was for unprivileged information
360	Attourney Client	Y	1/23/2009	Response on 3/30/2009, DR 360 S	DR 350S refers to response for DR 358
362	latan 2	Y	1/23/2009	Response on 4/3/2009, DR 362 S	Response on 2-2-09 for latan 1; 4-3 response was for latan 2. This completed provision of all data requested in the original DR.
363	Attourney Client	Y	1/23/2009	Response on 2/3/2009, unprivileged documents made available	
368	Attourney Client	Y	1/23/2009	Response on 2/2/2009	2-2-09 response was for unprivileged information
370	Attourney Client	Y	1/23/2009	Response on 3/30/2009, DR 370 S	DR 350S refers to response for DR 368
373	Attourney Client	Y	1/23/2009	Non-Responsive	Objected - No response provided
378	latan 2	Y	1/23/2009	Response on 4/3/2009, DR 378 S	latan 2 information subsequently provided in response to supplemental DR 378S. This completed provision of all data requested in the original DR.
382	latan 2	Y	1/23/2009	Response on 4/3/2009, DR 382 S	latan 2 information subsequently provided in response to supplemental DR 382S. This completed provision of all data requested in the original DR.
384	latan 2	Y	1/23/2009	Response on 3/26/2009, DR 384 S	latan 2 information subsequently provided in response to supplemental DR 384S. This completed provision of all data requested in the original DR.
387	latan 2	Y	1/23/2009	Response on 4/3/2009, DR 387 S	latan 2 information subsequently provided in response to supplemental DR 387S. This completed provision of all data requested in the original DR.
389	latan 2	Y	1/23/2009	Response on 4/3/2009, DR 389 S	latan 2 information subsequently provided in response to supplemental DR 389S. This completed provision of all data requested in the original DR.
392	latan 2	Y	1/23/2009	Response on 4/3/2009, DR 392 S	latan 2 information subsequently provided in response to supplemental DR 378S. This completed provision of all data requested in the original DR.
394	latan 2	Y	1/23/2009	Response on 4/3/2009, DR 394 S	latan 2 information subsequently provided in response to supplemental DR 394S. This completed provision of all data requested in the original DR.
395	latan 2	Y	1/23/2009	Responded in DR 472/473	Response on 2-2-09 for latan 1, referring to DR 472 for latan 1 (2-2-09) and 473 (2-3-09) for latan 2 (Objected. latan 2 subsequently provided on 4/7/09, completing the provision of all data requested in the original DR. See 0473S below)
397	latan 2	Y	1/23/2009	Responded on 4/3/2009, DR 397 S	Objected due to Attorney Client/Work Product. latan 2 information subsequently provided in response to supplemental DR 397S. This completed provision of all data requested in the original DR.
408	latan 2	Y	1/23/2009	Response on 3/30/2009, DR 408 S	latan 2 information subsequently provided in response to supplemental DR 408S. This completed provision of all data requested in the original DR.
411	Attourney Client	Y	1/23/2009	Response on 2/3/2009, unprivileged documents made available	
413	Attourney Client	Y	1/23/2009	Response on 2/3/2009, unprivileged documents made available	
415	Attourney Client	Y	1/23/2009	Response on 2/3/2009, unprivileged documents made available	
418	Attourney Client	Y	1/23/2009	Response on 2/3/2009, unprivileged documents made available	
422	Attourney Client	Y	1/23/2009	Response on 2/2/2009	2-2-09 response was for unprivileged information

424	Attorney Client	Y	1/23/2009	Non-Responsive		Objected - No response provided
427	Attorney Client	Y	1/23/2009	Response on 2/2/2009		2-2-09 response was for latan 1 information
430	latan 2	Y	1/23/2009	Partial Response on 2/3/2009		2-3-09 response was for latan 1 information
433	Attorney Client	Y	1/23/2009	Response on 2/3/2009, unprivileged documents made available		
436	Attorney Client	Y	1/23/2009	Response on 5/27/2009		2-3-09 response provided for unprivileged information. Iatan 2 information was provided on DR 436S on 4-3-09. This completed provision of all data requested in the original DR.
437	latan 2	Y	1/23/2009	Response on 4/3/2009, DR 437 S		Response on 2-2-09 for latan 1; 4-3 response was for latan 2. This completed provision of all data requested in the original DR.
438	latan 2	Y	1/23/2009	Response on 2/3/2009		2-3-09 response was for latan 1 information
452	Attorney Client	Y	1/23/2009	Response on 2/3/2009		2-3-09 response was for unprivileged information
463	latan 2	Y	1/23/2009	Response on 4/3/2009, DR 463 S		Iatan 2 information subsequently provided in response to supplemental DR 463S. This completed provision of all data requested in the original DR.
467	latan 2	Y	1/23/2009	Response on 3/30/2009, DR 467 S		Iatan 2 information subsequently provided in response to supplemental DR 467S. This completed provision of all data requested in the original DR.
470	latan 2	Y	1/23/2009	Response on 3/30/2009, DR 470 S		Iatan 2 information subsequently provided in response to supplemental DR 470S. This completed provision of all data requested in the original DR.
471	Attorney Client	Y	1/23/2009	Response on 2/3/2009		2-3-09 response was for unprivileged information
473	latan 2	Y	1/23/2009	Response on 3/31/2009, DR 473 S		Iatan 2 information subsequently provided in response to supplemental DR 473S. This completed provision of all data requested in the original DR.
474	latan 2	Y	1/23/2009	Response on 4/3/2009		Objected 1-27-09 but subsequently provided response on 4-3-09
491	latan 2	Y	1/23/2009	Response on 4/17/2009, DR 491 S		Iatan 2 information subsequently provided in response to supplemental DR 491S. This completed provision of all data requested in the original DR.
630.2A	Unduly Burdensome	N	10/27/2009	Partial Response		Objected to #4, refers to materials not in Company's possession or control
630.3	Attorney Client	N	9/2/2009	Response Subject to Objection		General, but not specific, response to #2. Objected due to Attorney Client/Work Product
630.4	Attorney Client	N	10/6/2009	Response Subject to Objection, Redacted		Redacted invoice information
637.1	Unduly Burdensome	Y	9/25/2009	Pending, filed 10/29/09		Objection filed 9-25-09; unduly burdensome and overly broad
642	Sensitive Employee Information	N	7/22/2009	Unredacted in Supplemental response		Last names of contractor safety program winners originally withheld for privacy purposes. Supplemental response including last names provided 7-29-09.
650	Attorney Client	Y	8/7/2009	Index of Sharepoint Documents provided		Request was for complete access to Sharepoint system. Objected due to Attorney Client/Work Product and that DR was overly broad and vague.
651	Mediation Communications	N	8/7/2009	Non-Responsive		#4 - Can not produce under MO law. Other questions answered by reference to earlier DRs.
677	Attorney Client	N	9/8/2009	Privilege Logged		Formal Objection. 9-8-09 response for non privileged information
710	Attorney Client Redactions	N	9/8/2009	Pending		Redacted Schiff Hardin report for 11-24-08 submitted 9-8-09.
720	Attorney Client Redactions	N	9/9/2009	Pending		9-9-09 response for non-privileged information
735	Refusal To Provide Confirmation	N	10/15/2009	Information would be "unduly burdensome" to provide		Response provided explanation of why electronic gate information is not reliable
782	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide		Burns & McDonald employee home addresses at time of each milage reimbursment not provided
770	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide		Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
769	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide		Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
767	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide		Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
766	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide		Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
765	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide		Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
764	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide		Response referred to DR 635 which provided explanation of why electronic gate information is not reliable

763	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide	Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
761	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide	Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
760	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide	Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
752	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide	Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
736	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide	Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
759	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide	Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
758	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide	Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
757	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide	Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
756	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide	Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
741	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide	Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
785	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide	Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
755	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide	Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
754	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide	Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
753	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide	Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
751	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide	Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
744	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide	Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
742	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide	Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
740	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide	Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
739	Refusal To Provide Information	N	10/27/2009	Information would be "unduly burdensome" to provide	Response referred to DR 635 which provided explanation of why electronic gate information is not reliable
(a) 11-4-09 clarification from Keith Majors					
For those that were officially objected to, such as the first group on the list, the date refers to the date of the objection that is listed on EFIS.					
For the latter requests that were not officially objected to, the date refers to the date of the initial response.					
Also, the Status column, for official objections, refers to the initial response to that Data Request.					
(b) Objection type "Attorney Client" includes objections to the extent that the data request calls for the production of information protected by the attorney/client privilege and/or attorney work product doctrine.					
(c) Where objection type shows "latan 2" the formal objection was that information on latan 2 was irrelevant to the latan 1 construction audit.					