

DATA REQUEST- Set MPSC_20090114
Case: ER-2009-0089
Date of Response: 02/02/2009
Information Provided By: Gerry Reynolds
Requested by: Schallenberg Bob

FILED

MAY 6 2010

Missouri Public
Service Commission

Question No. : 0339

Please provide copies of all documents related to the negotiation of the contract with Burns and McDonnell for design and engineering services for the Iatan 1 environmental upgrades and construction of Iatan 2, including draft contracts and proposed contract provisions.

Response:

KCPL objects to this data request to the extent it calls for the production of attorney-client privilege and/or attorney work product doctrine.

Response provided by Iatan Construction Project Procurement.

~~Staff~~ Exhibit No. 12
Date 4-29-10 Reporter KF
File No. EO-2010-0259

DATA REQUEST- Set MPSC_20090114

Case: ER-2009-0089

Date of Response: 02/03/2009

Information Provided By: Bill Riggins

Requested by: Schallenberg Bob

Question No. : 0342

Please provide copies of any documentation regarding the Schiff Hardin evaluation of the Burns & McDonnell Contract for design and engineering services for the Iatan 1 environmental upgrades and construction of Iatan 2.

Response:

KCP&L objects to this Data Request to the extent that it requests documents that are protected by the attorney-client privilege. To the extent that KCP&L has copies of unprivileged documents responsive to this Data Request, they will be made available for review in the data room located at KCP&L headquarters located at 1201 Walnut Street 64106.

DATA REQUEST- Set MPSC_20090114
Case: ER-2009-0089
Date of Response: 02/02/2009
Information Provided By: Gerry Reynolds
Requested by: Schallenberg Bob

Question No. : 0350

Please provide copies of all documents related to the negotiation of the contract with Alstrom for construction of the Iatan 1 & 2 air quality control system and Iatan 2 boiler.

Response:

KCPL objects to this data request to the extent it calls for production of information protected by the attorney-client privilege and/or attorney work.

Response prepared by Iatan Construction Project Procurement.

DATA REQUEST- Set MPSC_20090114
Case: ER-2009-0089
Date of Response: 02/02/2009
Information Provided By: Carl Churchman
Requested by: Schallenberg Bob

Question No. : 0370

Please provide copies of all documents related to the negotiation of the contract with Kissick for foundation work for Iatan.

Response:

KCPL objects to this data request to the extent it calls for the production of information protected by the attorney client privilege and/or attorney work product doctrine.

DATA REQUEST- Set MPSC_20090114
Case: ER-2009-0089
Date of Response: 02/03/2009
Information Provided By: Barbara Curry
Requested by: Schallenberg Bob

Question No. : 0403

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.

Response:

This response is Highly Confidential as it contains sensitive employee information.

The following individuals were identified for the response to the request for information.

David Price – Vice President
Carl Churchman – Vice President
Steve Easley – Vice President
Brent Davis – Iatan Unit 1 Director
John Grimwade – Director
Terry Murphy – Director
Jeff Fleener – Asst. Director
Terry Foster – Project Controls Manager
Mike Ballard – Construction Manager
Marc Hargis – Construction Manager
Russ Finkle – Construction Manager
Paul Waddell – Construction Manager
Steve Jones – Procurement Mgr
Scott Nichols – Procurement Mgr

Due to their confidential nature, the most recent written performance appraisals for each of the following individuals are available by contacting Tim Rush 816-556-2344 or Lois Liechti 816-556-2612 to make arrangements to view these documents.

Brent Davis – Iatan Unit 1 Director
John Grimwade – Director
Jeff Fleener – Asst. Director
Terry Foster – Project Controls Manager
Russ Finkle – Construction Manager
Paul Waddell – Construction Manager

Terry Murphy and Mike Ballard are no longer employed with the company and were in their positions for less than a year. Consequently, written performance evaluations were not conducted.

A written performance evaluation for Scott Nichols, Procurement Manager, was not located.

Marc Hargis and Steve Jones are contract employees and, as such, are not subject to the company's performance evaluation process for employees.

Response provided by Rusty McCarty, HR Manager

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Case: ER-2009-0089

Date of Response: 02/03/2009

Information Provided By: Bill Riggins

Requested by: Schallenberg Bob

Question No.: 0411

Copies of all documents related to the selection of Schiff Hardin to provide independent oversight and Project Controls advice for Iatan 1 & 2.

Response:

To the extent that KCP&L has been able to locate copies of unprivileged documents responsive to this Data Request, they will be made available for review in the data room located at KCP&L headquarters located at 1201 Walnut Street 64106.

DATA REQUEST- Set MPSC_20090114
Case: ER-2009-0089
Date of Response: 02/03/2009
Information Provided By: Bill Riggins
Requested by: Schallenberg Bob

Question No. : 0413

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.

Response:

KCP&L objects to this Data Request to the extent that it requests documents that are protected by the attorney-client privilege. To the extent that KCP&L has been able to locate copies of unprivileged documents responsive to this Data Request, they will be made available for review in the data room located at KCP&L headquarters located at 1201 Walnut Street 64106.

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Case: ER-2009-0089
Date of Response: 02/03/2009
Information Provided By: Carl Churchman
Requested by: Schallenberg Bob

Question No. : 0443

Please provide a copy of the Iatan “Project Risk Assessment and Mitigation Plan” with all copies of all subsequent modifications. (See Steve Jones Deposition Page 57}.

Response:

Due to their confidential nature, all documents are available by contacting Tim Rush 816-556-2344 or Lois Liehti 816-556-2612 to make arrangements to view these documents.

Response provided by Iatan Construction Project Compliance.

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Case: ER-2009-0089
Date of Response: 02/03/2009
Information Provided By: Gerry Reynolds
Requested by: Schallenberg Bob

Question No. : 0490

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 Iatan 1.

Response:

The current Control Budget Estimate for Iatan 1 is \$484 million.

Due to their confidential nature, all of the documentation supporting the development, review, analysis and approval of the contingency and executive contingency included in the current control budget estimate for environmental upgrades at Iatan 1 are available by contacting Tim Rush 816-556-2344 or Lois Liechti 816-556-2612 to make arrangements to view these documents.

Response provided by Iatan Construction Project, Project Controls.

This information was provided for onsite viewing to the Commission Staff in early 2008 as part of its investigation in Case No. EM-2007-0374.