

No. 3301

**KCP&L GREATER MISSOURI OPERATIONS COMPANY (GMO)
DATA REQUEST
TO
MISSOURI DEPARTMENT OF NATURAL RESOURCES
CASE NO. EE-2009-0237**

MDNR RESPONSE

Requested From: Missouri Department of Natural Resources
Requested By: James M. Fischer
Date Requested: July 7, 2011

Information Requested: Please provide the following information:

1) List of expected MDNR witnesses in hearing on August 1-2, 2011;
RESPONSE: Adam Bickford, Ph.D.

2) Educational and work experience of MDNR witnesses;
RESPONSE: See the Attached file "Adam Bickford 2011 MDNR.pdf"

- 3) Opinions that are likely to be expressed by each MDNR witness at the hearing on August 1-2, 2011;
4) List of any remaining deficiencies in GMO's IRP Plan that MDNR asserts exists as a result of the filing of the GMO IRP Plan on July 1, 2011.
5) Does MDNR believe that GMO has violated the terms and conditions of the Nonunanimous Stipulation and Agreement in File No. EE-2009-0237. If so, please explain in detail how GMO has violated the terms and conditions of the Nonunanimous Stipulation and Agreement in File No. EE-2009-0237.

RESPONSE to 3), 4) and 5): Although MDNR's review of GMO's July 1, 2011 filing is not complete; MDNR will likely raise three issues regarding GMO's January 18, 2011 filing, its July 1, 2011 filing and its actions in the stakeholder process for File No. EE-2009-0237. These issues, as enumerated below, incorporate MDNR's opinions concerning the deficiencies and terms and conditions of the Nonunanimous Stipulation in File No. EE-2009-0237. MDNR will assert at hearing that GMO has violated this agreement on at least the following points:

1. *GMO's selection of candidate alternative resource plans to submit to integrated analysis in its July 1, 2011 filing violates agreements that GMO reached with parties during the stakeholder process that was established in the April 12, 2010 Stipulation and Agreement.*
2. *GMO did not select a preferred plan in its January 18, 2011 filing did not fully honor the April 12, 2010 Stipulation and Agreement and agreements that GMO reached during the stakeholder process.*

GMO Exhibit No. 2
Date 8/1/11 Reporter JL
File No. EE-2009-0237

3. *GMO's July 1, 2011 filing does not discuss or fully account for the changed circumstances to which GMO attributed its inability to select a preferred resource plan in its January 18, 2011 filing.*

MDNR asserts two additional deficiencies in GMO's various filings:

1. *GMO has not demonstrated the cost-effectiveness of their DSM portfolio as required in 4 CSR 240-22.050(7).*
2. *GMO has changed the programs in their "enhanced" DSM portfolio presented in its July 1, 2011 filing, but has not provided the documentation of the programs as required in 4 CSR 240-22.050(6)(C) and 4 CSR 240-22.050(11)(G).*

- 6) Identify any other opinions that are expected to be contained in the testimony of MDNR witnesses or their consultants during the evidentiary hearings to be held on August 1-2, 2011.

RESPONSE: None have been identified at this time.

Response Provided:

The information provided to the GMO in response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the GMO if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Received: _____ Received By: _____

Prepared By: _____

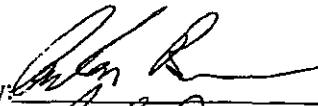
Verification of Response

Missouri Department of Natural Resources, Division of Energy

CASE NO. EE-2009-0237

The response to data requests GMO No. 3301.1 to 3301.6 is true and accurate to the best of my knowledge and belief.

Date Received: July 7, 2011

Received By: 

Prepared By: 

Date: July 27, 2011