

**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 RESPONSE TO THE REQUEST OF THE SPECIAL MASTER

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through counsel, and for its response to the Special Master, appointed by the Missouri Public Service Commission (Commission) in the above captioned matters, to file a timeline providing specific dates Staff issued data requests were issued and responded to. The attached chart provides the timeline requested by the Special Master. The Staff and Kansas City Power & Light Company (KCPL) could not agree on the level of detail to provide to the Special Master regarding KCPL's provision or non-provision of privilege logs in response to Staff data requests. As a consequence, the Staff and KCPL are making separate rather than a joint filing in response to the Special Master.

Respectfully submitted;

/s/ Jaime N. Ott

Jaime N. Ott
Assistant General Counsel
Missouri Bar No. 60949

Steven Dottheim
Chief Deputy Staff Counsel
Missouri Bar No. 29149

Attorneys for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

jaime.ott@psc.mo.gov
(573) 751-8700 (Telephone)
(573) 751-9285 (Fax)

steve.dottheim@psc.mo.gov
573-751-7489 (Telephone)
573-751-9285 (Fax)

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 4th day of January 2011.

/s/ Jaime N. Ott _____

DATA REQUESTS TIMELINE FOR SPECIAL MASTER

DR #	Originated Case #	Issued Date	Request	Response Date	Date KCP&L Objected and/or Asserted Attorney/Client Privilege and/or Work Product Privileges	Privilege Log
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 Iatan 1 environmental upgrades and construction of Iatan 2. Please include documentation received by all vendors considered to provide design and engineering services for the Iatan 1 environmental upgrades and construction of Iatan 2.	04/15/2009 02/02/2009	01/27/2009	Data Request is no longer an issue as Staff received sufficient documentation
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 Iatan 1 environmental upgrades and construction of Iatan 2, including draft contracts and proposed contract provisions.	04/15/2009 03/30/2009 02/02/2009	02/02/2009	Privilege Log dated 11/05/2009
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 Iatan 1 environmental upgrades and construction of Iatan 2.	04/15/2009 02/03/2009	02/03/2009	Privilege Log dated 11/05/2009
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 Iatan 1 & 2 air quality control system and Iatan 2 boiler.		01/27/2009	Data Request is no longer an issue as Staff received

DR #	Originated Case #	Issued Date	Request	Response Date	Date KCP&L Objected and/or Asserted Attorney/Client Privilege and/or Work Product Privileges	Privilege Log
						sufficient documentation
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.	04/15/2009 04/07/2009 02/02/2009	02/02/2009	Privilege Log dated 11/05/2009
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 boiler.	04/15/2009 02/03/2009	02/03/2009	Privilege log dated 11/16/2009
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 latan.	04/15/2009 02/03/2009	01/27/2009	Privilege log dated 11/05/2009
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 latan.	04/15/2009 03/30/2009 02/02/2009	02/02/2009	Privilege log dated 11/05/2009
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 latan.	04/15/2009	Relied on 02/02/2009 Objection	Privilege Log dated 11/05/2009
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 latan.	04/15/2009 02/03/2009	02/03/2009	Privilege Log dated 11/05/2009
368	ER-2009-0089	01/14/2009	Copies of all documents related to the selection of Kissick to provide	04/15/2009 02/02/2009	01/27/2009	No Log

DR #	Originated Case #	Issued Date	Request	Response Date	Date KCP&L Objected and/or Asserted Attorney/Client Privilege and/or Work Product Privileges	Privilege Log
			foundation work for latan 1 & 2.			
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 latan.	02/02/2009	02/02/2009	Privilege Log dated 11/05/2009
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 latan.	04/15/2009	01/27/2009	Privilege log dated 11/16/2009
394 (53)	ER-2009-0090 (EO-2010-0259)	01/14/2009	1. Please describe the reasons why KCPL hired Polsinelli Shughart PC to perform work on the latan construction projects. 2. Please provide a complete copy of each and every invoice submitted by Polsinelli Shughart PC related to the latan construction projects. Please ensure that a full description of the services provided are included. 3. Please provide a copy of all communications related to the latan projects between KCPL and/or GPE and Polsinelli Shughart PC. 4. Please provide a copy of any purchase order and/or contract between Polsinelli Shughart PC and the Company related to the latan construction projects.	06/09/2009	06/09/2009	No Log
397 (56)	ER-2009-0090 (EO-2010-0259)	01/14/2009	Please provide a copy of each and every document produced by Pegasus Global Holdings	06/16/2009	06/16/2009	No Log

DR #	Originated Case #	Issued Date	Request	Response Date	Date KCP&L Objected and/or Asserted Attorney/Client Privilege and/or Work Product Privileges	Privilege Log
			(Pegasus) for KCPL related to the latan construction projects. Additionally, include each and every review and comments by Pegasus related to the Ernst & Young materials and reports, and Ernst & Young evaluations of various projects.			
398 (57)	ER-2009-0090 (EO-2010-0259)	01/14/2009	1. Did KCPL hire Duane Morris LLP to provide work related to the latan construction projects? If yes, please describe the rationale behind this KCPL's decision and respond to the questions below. 2. Please provide a complete copy of each and every invoice submitted by Duane Morris LLP related to the latan construction projects. Please ensure that complete descriptions of the services provided are included. 3. Please provide a copy of all communications related to the latan projects between KCPL and/or GPE and Duane Morris LLP . 4. Please provide a copy of each and every purchase order and/or contract between Duane Morris LLP and KCPL.	06/16/2009	06/16/2009	No Log
398S ¹ (57)	ER-2009-0089 (EO-2010-0259)	01/14/2009	1. Did KCPL hire Duane Morris LLP to provide work related to the latan construction projects? If yes, please describe the rationale behind this KCPL's decision and	09/08/2009	09/08/2009	No log

¹ "S" means supplemental data request.

DR #	Originated Case #	Issued Date	Request	Response Date	Date KCP&L Objected and/or Asserted Attorney/Client Privilege and/or Work Product Privileges	Privilege Log
			respond to the questions below. 2. Please provide a complete copy of each and every invoice submitted by Duane Morris LLP related to the latan construction projects. Please ensure that complete descriptions of the services provided are included. 3. Please provide a copy of all communications related to the latan projects between KCPL and/or GPE and Duane Morris LLP . 4. Please provide a copy of each and every purchase order and/or contract between Duane Morris LLP and KCPL.			
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 latan 1 & 2.	04/15/2009 02/03/2009	02/03/2009	Privilege Log dated 11/05/2009
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 latan 1 & 2.	04/15/2009 02/03/2009	02/03/2009	Privilege Log dated 11/05/2009
415I ²	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 latan 1 or 2.		11/09/2009	Privilege Log dated 11/05/2009
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		12/2/2009	Privilege Log dated 12/01/2009

² "I" means informal data request.

DR #	Originated Case #	Issued Date	Request	Response Date	Date KCP&L Objected and/or Asserted Attorney/Client Privilege and/or Work Product Privileges	Privilege Log
			the latan 1 or 2.			
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 latan 1 or 2.		KCP&L Provided a Supplement on 08/20/2009	Privilege Log dated 08/21/2009
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.	12/06/2010 11/12/2010 11/02/2010 10/29/2010 07/30/2010 03/31/2010	03/26/2010	Privilege Log dated 03/26/2010
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 latan 1 and 2 construction projects.	10/29/2010 08/03/2010 04/15/2009 02/03/2009	01/27/2009	Privilege Log dated 10/26/2010
418R ³	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 latan 1 and 2 construction projects.	Recurring	08/03/2010	Privilege Log dated 10/26/2010
422	ER-2009-0089	01/14/2009	Copies of all documents related to the selection of Ernst & Young to	02/02/2009 04/15/2009	01/27/2009	Data Request is no longer an

³ "R" means recurring data request.

DR #	Originated Case #	Issued Date	Request	Response Date	Date KCP&L Objected and/or Asserted Attorney/Client Privilege and/or Work Product Privileges	Privilege Log
			provide audit services for latan 1 environmental upgrade or latan 2 construction projects.			issue as Staff received sufficient documentation
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 latan 1 environmental upgrade or latan 2 construction projects.	02/03/2009	01/27/2009	Data Request is no longer an issue as Staff received sufficient documentation
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 latan.	02/03/2009	01/27/2009	Data Request is no longer an issue as Staff received sufficient documentation
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 latan 1 and 2 before design was substantially completed.	12/10/2010 04/15/2009 02/03/2009	01/27/2009	Privilege Log dated 11/05/2009
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.	02/03/2009	01/27/2009	No log
433R	ER-2009-0089	01/14/2009	Please provide copies of all reports and presentations Schiff Hardin provided to KCPL's senior	Recurring	08/03/2010	No Log

DR #	Originated Case #	Issued Date	Request	Response Date	Date KCP&L Objected and/or Asserted Attorney/Client Privilege and/or Work Product Privileges	Privilege Log
			management, Executive Oversight Committee (EOC), and project personnel.			
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.	07/06/2010 04/15/2009 04/03/2009 02/03/2009	01/27/2009	No 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.	Recurring	07/06/2010	No 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.	Recurring	07/09/2010	Objection
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 process relative to issues regarding the current Iatan 1 and 2 construction projects.	04/15/2009 02/03/2009	01/27/2009	No Log
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,	Recurring	08/03/2010	No Log

DR #	Originated Case #	Issued Date	Request	Response Date	Date KCP&L Objected and/or Asserted Attorney/Client Privilege and/or Work Product Privileges	Privilege Log
			or employee internal complaint process relative to issues regarding the current latan 1 and 2 construction projects.			
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.	02/03/2009	11/05/2009	Privilege log dated 11/17/2009
622.5R	EO-2010-0259	06/04/2010	Please update John Park and Forrest Archibald cost data monthly pursuant to prior agreement.	12/22/2010 12/14/2010 12/02/2010 11/19/2010 10/28/2010 10/20/2010 09/29/2010	07/15/2010	Privilege Log dated 7/9/2010 Updated 09/24/2010
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.	09/02/2009	09/02/2009	Data Request is no longer an issue as Staff received sufficient documentation
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	10/06/2009	10/06/2009	Privilege Log dated 10/26/2010

DR #	Originated Case #	Issued Date	Request	Response Date	Date KCP&L Objected and/or Asserted Attorney/Client Privilege and/or Work Product Privileges	Privilege Log
			latan common plant work order. Please also include the payment voucher showing where the invoiced costs were charged.			
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.	08/07/2009	08/07/2009	Privilege Log dated 11/12/2009
637.1	ER-2009-0089	09/10/2009	Please provide a copy of each and 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.	10/29/2009	09/25/2009	No Log
650	ER-2009-0089	07/24/2009	Please provide the Staff with access to the latan Joint Owners Sharepoint website.	08/07/2009	08/07/2009	Data Request is no longer an issue as Staff received sufficient documentation
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.	11/06/2009	11/06/2009	Privilege Log dated 11/05/2009
673.1	ER-2009-0089	09/25/2009	1. Identify any David Price sent e-	10/29/2009	10/28/2009	No log

DR #	Originated Case #	Issued Date	Request	Response Date	Date KCP&L Objected and/or Asserted Attorney/Client Privilege and/or Work Product Privileges	Privilege Log
			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.			
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	09/08/2009	08/10/2009	Privilege Log dated 11/15/2010
710	ER-2009-0089	08/17/2009	Please provide copies of each and every Schiff-Hardin Report provided to KCPL since December 18, 2007.	12/24/2009 09/16/2009 09/08/2009	09/08/2009	Privilege Log dated 11/05/2009
710S	ER-2009-0089	08/17/2009	Please provide copies of each and every Schiff-Hardin Report provided to KCPL since December 18, 2007.	09/16/2009	09/16/2009	Privilege Log dated 11/05/2009
710S1	ER-2009-0089	08/17/2009	Please provide copies of each and every Schiff-Hardin Report provided to KCPL since December 18, 2007.	12/24/2009	12/24/2009	Privilege log dated 1/25/2010
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.	05/11/2010	05/11/2010	Privilege Log dated 05/10/2010
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.	11/04/2009	09/25/2009	Privilege Log dated 10/27/2010

DR #	Originated Case #	Issued Date	Request	Response Date	Date KCP&L Objected and/or Asserted Attorney/Client Privilege and/or Work Product Privileges	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 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.	09/09/2009	09/9/2009	Privilege Log dated 10/29/2010
817	ER-2009-0089	11/13/2009	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.	12/21/2009	11/24/2009	Privilege Log dated 12/16/2009 Update 10/29/2010
843	ER-2009-0089	11/30/2009	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	12/04/2009	12/04/2009	Data Request is no longer an issue as Staff received sufficient

DR #	Originated Case #	Issued Date	Request	Response Date	Date KCP&L Objected and/or Asserted Attorney/Client Privilege and/or Work Product Privileges	Privilege Log
			<p>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 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</p>			documentation

DR #	Originated Case #	Issued Date	Request	Response Date	Date KCP&L Objected and/or Asserted Attorney/Client Privilege and/or Work Product Privileges	Privilege Log
			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)	12/24/2009	12/24/2009	No Log
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.	01/12/2010 12/28/2009	12/24/2009	No Log
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.	10/29/2010 08/02/2010 02/01/2010	02/01/2010	Privilege Log dated 1/29/2010 updated 3/18/2010 & 11/01/2010
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	Recurring	08/02/2010	Privilege Log dated 11/01/2010

DR #	Originated Case #	Issued Date	Request	Response Date	Date KCP&L Objected and/or Asserted Attorney/Client Privilege and/or Work Product Privileges	Privilege Log
			Coal Project Investment Tax Credits Under IRC Section 48A.			
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.	01/26/2010	01/26/2009	Privilege Log dated 2/26/210 updated 10/29/2010
872	ER-2009-0089	01/14/2010	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 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.	02/09/2010	02/09/2010	No Log
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	02/18/2010	02/18/2010	No Log

DR #	Originated Case #	Issued Date	Request	Response Date	Date KCP&L Objected and/or Asserted Attorney/Client Privilege and/or Work Product Privileges	Privilege Log
			<p>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</p>			

DR #	Originated Case #	Issued Date	Request	Response Date	Date KCP&L Objected and/or Asserted Attorney/Client Privilege and/or Work Product Privileges	Privilege Log
			these functions participate in the Schiff Hardin invoice approval process?			
888	ER-2009-0089	01/282010	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)	02/24/2010	02/24/2010	Privilege Log dated 2/24/2010 updated 10/29/2010

DR #	Originated Case #	Issued Date	Request	Response Date	Date KCP&L Objected and/or Asserted Attorney/Client Privilege and/or Work Product Privileges	Privilege Log
			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.			
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.		Action Item, No Response Required	
900.1	EO-2010-0259	03/31/2010	Reference DR 900. Please comply with Missouri Rules of Civil Procedure, specifically 57.01(3).	04/22/2010	04/09/2010	Privilege Log dated 10/29/2010
902.1	EO-2010-0259	03/31/2010	Reference DR 902. Please comply with Missouri Rules of Civil Procedure, specifically 57.01(3).	04/20/2010	04/09/2010	Privilege Log dated 10/29/2010
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.	06/29/2010	06/18/2010	Data Request is no longer an issue as Staff received sufficient documentation
964	EO-2010-0259	06/08/2010	1. Please provide a list of and a copy of all sole source	07/29/2010	06/18/2010	Data Request is no longer an

DR #	Originated Case #	Issued Date	Request	Response Date	Date KCP&L Objected and/or Asserted Attorney/Client Privilege and/or Work Product Privileges	Privilege Log
			<p>recommendation letters related to work on the Iatan 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 Iatan construction projects from the inception of the project through May 2010.</p>			<p>issue as Staff received sufficient documentation</p>