BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the 2011 Resource	)	
Plan of Kansas City Power &	)	**Case No. EE-2011-0032**
Light Company	)	

PUBLIC COUNSEL'S RESPONSE TO ORDER DIRECTING NOTICE AND ESTABLISHING TIME TO RESPOND TO APPLICATION FOR WAIVER

COMES NOW the Office of the Public Counsel for its Response to Order Directing Notice and Establishing Time to Respond to Application for Waiver states as follows:

1. On February 17, 2007, several of the parties (including Kansas City Power & Light Company or "KCPL") to Case No. EO-2007-0008 filed a stipulation and agreement, which included the following: "KCPL's next three year IRP filing will be filed on November 5, 2011 (the "2011 Filing"), assuming there are no changes to the Electric Utility Resource Planning Rules, 4 CSR 240-22 (Chapter 22), that preempt this filing schedule." The Commission approved the agreement in an order issued on April 12, 2007. In that order, after noting that it was the result of "extensive negotiations," the Commission ordered that: "The Stipulation and Agreement filed on February 13, 2007, is approved and the signatory parties are ordered to comply with its terms."

2. On April 9, 2009, several of the parties to Case No. EE-2008-0034 filed a stipulation and agreement. On April 22, 2009, the Commission issued an order approving that agreement and treating it as unanimous pursuant to 4 CSR 240-2.115(2)(C). In that order, the Commission ordered the parties to comply with the terms of the agreement, and accepted Kansas City Power & Light Company's 2008 integrated resource plan in compliance with Commission Rule 4 CSR 240 – Chapter 22. The agreement in Case No. EE-2008-0034 did not alter or

modify the agreement in EE-2007-0008 with respect to the November 5, 2011 filing date for the next IRP filing.

3. On February 5, 2010, KCPL filed a "Letter Regarding Notice of Preferred Resource Plan Change" in Case No. EE-2008-0034. That letter informed the Commission and parties that the Preferred Resource Plan identified in that case was "no longer appropriate," and that KCPL was scaling back its demand side management programs and moved the 2009 planned addition of wind resources to a later period (see Letter Regarding Notice of Preferred Resource Plan Change filed on February 5, 2010, in Case No. EE-2008-0034, attached hereto as Attachment 1).

4. On May 28, 2010, in Case No. EO-2010-0353, KCPL requested Commission approval to sell a number of wind turbines and associated property rights. KCPL ultimately decided not to make the sale, but not before Staff and Public Counsel raised a number of questions – not just about the sale itself, but about how that decision fit within the broader scope of KCPL's resource planning process (see Public Counsel Response to Order Regarding Application and Recommendation and Motion to Modify Procedural Schedule, filed on July 3, 2010 in Case Number EO-2010-0353, attached hereto as Attachment 2).

5. On July 22, 2010 Tim Rush of KCPL emailed OPC and other parties for feedback on a wind RFP that it had already distributed to potential vendors/contractors. By sending this RFP to Public Counsel and others after the RFP was already finalized and sent to potential respondents, KCPL violated the provision of the Stipulation and Agreement in Case No EE-2008-0034 which stated:

> KCPL agrees to provide advanced copies of Requests for Proposals (RFPs) to Staff, OPC and Parties to that case [Case No. EO-2005-0329), provided the RFP

is issued with the intent of adding resources beyond the resources included in the Regulatory Plan, Case No. EO-2005-0329.

6. On July 27, 2010, Ryan Kind of Public Counsel emailed a response (See Attachment 3) to Mr. Rush's email where he pointed out OPC's high level of interest in KCPL's resource planning process and decisions related to wind generation resources and asked the following questions to which KCPL has still not responded:

- Why does KCPL believe that providing the RFP to OPC after the RFP has already been sent out is consistent with the terms of the regulatory plan in Case No. EO-2005-0329?
- Is KCPL able to provide OPC with some documentation of the analysis it performed on the range of options (i.e. the "big picture" perspective) that were reviewed prior to focusing the Company's efforts on the course of action in the RFP?
- If KCPL has not yet performed such an analysis, does it intend to perform this type of "big picture" analysis once it has received responses to this RFP that will permit the Company to better compare the RFP "course of action" to its other potential options?

7. At the most recent meeting of the KCPL Customer Program Advisory Group (CPAG) on August 23, 2010, Carol Sivils stated that KCPL may not be able to continue its existing DSM programs at current budget levels unless the throughput incentive is addressed. Downward adjustments could be made in the near future to KCPL's DSM expenditure levels as it reaches the total level of DSM expenditures committed to under the KCPL regulatory plan, according to Ms. Sivils. During that meeting, Ryan Kind of OPC expressed an interest in having further discussions with KCPL in order to attempt to find a way for KCPL to avoid interrupting or scaling back its DSM programs but no further discussions have taken place. The August 23, 2010 CPAG meeting was not the first time that KCPL has indicated in meetings that it may need to reassess future funding levels of its DSM programs. As noted above in this pleading, KCPL's

letter to the Commission on February 3, 2010 also stated that it was scaling back its demand side management programs.

8. KCPL's February 3, 2010 letter in which it states that the Preferred Resource Plan filed in Case No. EE-2008-034 is no longer appropriate does not specifically address changes to its Supply-Side environmental compliance plan, which raises the following questions:

- Is KCPL still proceeding to implement the environmental upgrades on its generating units that were laid out in the environmental compliance portion of its Supply-Side implementation plan?
- How is KCPL responding to the changing regulations in the area of environmental compliance planning?
- What is KCPL's timeline for making key decisions about future plans to retrofit or retire some of its coal generation units and what kind of analysis is KCPL performing to help it make informed decisions?

Public Counsel believes that the answers to these questions can have significant impacts on ratepayers and the public in Missouri and delaying the next IRP filing is moving in the wrong direction.

9. The letter filed in Case No. EO-2008-0034, the scramble to figure out what to do with the wind turbines stored near Spearville, Kansas,[1] KCPL's lack of commitment to acquiring all cost effective Demand-Side resources, and the uncertain status of KCPL's environmental compliance analysis and plans all raise red flags about the current state of KCPL's resource plan and the state of KCPL's resource planning.

10. On August 5, 2010, KCPL filed an application asking the Commission to waive a provision of its Electric Utility Resource Planning (IRP) regulation to allow KCPL to delay filing

[1] This is merely the latest chapter in the serial about the 100MW of wind resources that were originally planned for 2008, and may only partially be installed by the end of 2010.

its next IRP submission from August 5, 2011,[2] until April 1, 2012. KCPL bases its request on two grounds: 1) that a preliminary draft of revisions to Chapter 22 of the Commission's rules would require an additional KCPL IRP filing on April 1, 2012 and two filings in such a short time would be inefficient; and 2) a delay in the filing date for KCP&L's next IRP would allow KCPL and KCPL-GMO time to consider filing a single or streamlined IRP on April 1, 2012. With respect to the first ground, Public Counsel agrees that two complete IRP filings within a five-month period would be inefficient, but not necessarily that the appropriate remedy is to delay the agreed-to, approved, and currently-scheduled November 2010 filing. Other possible remedies would be to waive (or move) the April 2012 filing, or to modify the filing date in the new Chapter 22 rules before they are promulgated. With respect to the second ground, KCPL does not explain, and Public Counsel can see no reason, why such consideration cannot take place in the near future without the necessity of a total waiver of the agreed-to, approved, and currently-scheduled November 2011 filing.

11. Public Counsel agrees that the possibility that KCPL may be placed in a situation with two complete IRP filings in a five-month period needs to be addressed, but a total waiver of the 2011 IRP filing is not the right remedy. Rather than having the Commission grant a total waiver, Public Counsel suggests that the stakeholders in KCPL's IRP process meet in an attempt to agree upon a more appropriate remedy.

WHEREFORE, Public Counsel respectfully requests that the Commission deny KCPL's request for a waiver, or in the alternative, defer ruling and schedule a conference for the stakeholders to discuss possible remedies.

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[2] In a request to amend the application, KCPL notes that its next filing is actually due on November 1, 2011. The fact that KCPL has such uncertainty about when the next filing is due raises another red flag.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

/s/ Lewis R. Mills, Jr.

By:______________________________

Lewis R. Mills, Jr. (#35275)
Public Counsel
P O Box 2230
Jefferson City, MO 65102
(573) 751-1304
(573) 751-5562 FAX
lewis.mills@ded.mo.gov

I hereby certify that a copy of the foregoing has been emailed to the following parties of record this 7th day of September 2010:

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Missouri Public Service Commission
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/s/ Lewis R. Mills, Jr.

____

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Telephone: (573) 636-6758
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February 3, 2010

Mr. Steven Reed
Secretary/General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65101

Re: Kansas City Power & Light Company, Case No. EE-2008-0034

Dear Mr. Reed:

This letter is to inform the Missouri Public Service Commission that Kansas City Power & Light Company (KCP&L) has determined that the Preferred Resource Plan, which was filed in the Integrated Resource Plan, Case No. EE-2008-0034 filed in August 2008, is no longer appropriate.

This notice is provided in compliance with 4 CSR 240-22.080(10). Specifically, in reference to the demand-side component of its Preferred Resource Plan, KCP&L has now determined that it is appropriate to scale back it demand-side resource programs in the earlier years of the plan. The scale back of the demand-side resources is caused by a reduction in the load forecast, primarily attributable to the unprecedented economic recession that has affected both customer and energy growth in our service territory. This does not impact the current energy efficiency and demand-side response programs established in the Experimental Regulatory Plan, Case No. EO-2005-0329 (Comprehensive Energy Program).

Additionally, due to a number of conditions, KCP&L has moved the 2009 planned addition of wind to a later period. The Company has addressed the addition of wind in several status reports filed in Case No. EO-2008-0224. KCP&L continues to aggressively pursue alternatives to allow the addition of wind into its supply portfolio. KCP&L issued a Request for Proposal (RFP) in December 2009 for 100 MW of wind in 2010 and 200 MW of wind in 2011.

KCP&L has also included solar generation to its resource portfolio in response to the requirement established in Proposition C, beginning in 2011. In May 2009, KCP&L and KCP&L Greater Missouri Operations Company issued a RFP to meet the anticipated solar capacity needs.

The change to the Preferred Resource Plan as set out in the Integrated Resource Plan does not cause a change to KCP&L's Resource Plan as set out in the Experimental Regulatory Plan, Case No. EO-2005-0329.

Sincerely,

James M. Fischer

James M. Fischer
Counsel for Kansas City Power & Light Company

Cc: Parties of record in Case No. EE-2008-0034

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Kansas	)	
City Power & Light Company Regarding	)	**Case No. EO-2010-0353**
The Sale of Assets and Property Rights	)	
Located Near Spearville, Kansas	)	

RESPONSE TO ORDER REGARDING APPLICATION, RECOMMENDATION, AND MOTION TO MODIFY PROCEDURAL SCHEDULE

COME NOW the Office of the Public Counsel and for its Response to Order Regarding Application and Recommendation and Motion to Modify Procedural Schedule respectfully state as follows:

1. In its Order Regarding Application issued on June 16, 2010, the Commission ordered its Staff and Public Counsel to file, no later than July 13, recommendations concerning KCPL's Application. This response and recommendation is filed in compliance with that order.

2. Public Counsel expected KCPL to do its best to explain and justify its decision in its Application in this case. Public Counsel had hoped that KCPL had done analysis to support its decision, and Public Counsel would simply have to examine that analysis to see whether the decision made sense. Unfortunately, that does not appear to be the case. It appears that the decision was made in a very off-the-cuff manner, and much of the analysis was created after the decision was made – and even the after-the-fact analysis is cursory and unconvincing. Thus the lack of support in the Application is not because KCPL is holding back, but because KCPL just does not have much support for its decision.

3. At this time, Public Counsel is unable to determine whether the sale would be detrimental. Public Counsel has submitted and continues to submit data requests, some of which have required follow-up DRs.[1] KCPL has provided a significant volume of material, but little in the way of compelling analysis. It appears from the information received to date that the decision to sell the wind turbines was based on a gut reaction to avoid additional capital expenditures while Iatan 2's estimated completion date kept being extended and the project's capital expenditures were ballooning uncontrollably. It may be that KCPL's gut reaction was the right reaction, but until proper analysis is done, it is impossible to say. KCPL has failed to explain in a straightforward way what analysis led it to choose this path. Apart from some vaguely identified fears about its credit metrics, KCPL has failed to offer any reasons why ratepayers will not be detrimentally affected by the proposed transactions.

4. In addition to the drivers caused by the lengthy delays and massive cost overruns at Iatan 2,[2] it appears that the other driver that KCPL believes is forcing it into selling the turbines and land rights is the commitment to the Sierra Club to install another

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[1] The response to one of these follow-up DRs, DR Number 2018, states that it contains a number of files "that were inadvertently omitted from the response to OPC DR No. 2005." Another, received mid-afternoon on the date of this filing, contained information that should have been provided in response to an earlier DR (DR Number 2003). Yet another, also received mid-afternoon on the date of this filing, refused to provide the requested information but stated that it would "be made available for review at the Company's offices."

[2] The impact of these delays on KCPL's credit metrics is magnified by the fact that the delays have caused KCPL to wait much longer than planned to file its currently pending rate case.

100MW of wind by the end of 2010.[3] Ratepayers appear to be bearing the harm because of KCPL's agreement with the Sierra Club and because of KCPL's inability to complete Iatan 2 on time and on budget. The whole wind turbine transaction and the drivers behind it are far more complicated than a simple sale of some turbines not yet producing electricity. The Commission was right to require KCPL to seek approval of the transaction, and the Commission should grant approval if and only if KCPL is able to demonstrate that there will be no detriment from the transaction as a whole.

5. KCPL **only** analyzed options that would result in 100 MW of wind capacity by the end of 2010, but there is no explicit acknowledgment of that criteria or justification for it. KCPL has not done (or has not provided) any analysis that compares its chosen course of action to: 1) continuing to hold the 32 turbines in storage; 2) putting the 32 turbines into service itself in 2010 or 2011 at the Spearville property (without additional turbines); 3) selling the turbines (without entering into a PPA); 4) selling the turbines and property rights (without entering into a PPA); 5) selling the turbines and entering into a PPA for only the 48 MW of wind from those turbines; or 6) any number of other possibilities.

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[3] In its March 19, 2007 Collaboration Agreement with the Sierra Club and Concerned Citizens of Platte County, KCPL committed "to add 100 additional megawatts (MW) capacity of wind-generated electric power by December 31, 2010…." (Collaboration Agreement, Section III. a). This commitment is separate and apart from the Regulatory Plan approved by the Commission in Case No. EO-2005-0329. The Collaboration Agreement provides that: "The parties agree that the commitments contained in this Agreement are not intended to change or modify the terms of the Experimental Regulatory Plan originally approved by the MPSC in Case No. EO-2005-0329…." (Collaboration Agreement, Section V).

6. Public Counsel recommends that the Commission order KCPL, in response to this filing and the Staff filing, to file testimony that describes: 1) the timeline of events relevant to the sale in question; 2) all analyses done to arrive at the decision (including when they were done); 3) what options were analyzed; 4) why those options were chosen (including why only 2010 100 MW wind options were chosen); 5) what the various analyses showed; and 6) how the options and the results of the analyses were presented to decision-makers at GPE and KCPL and 7) identification of the decision-makers at GPE and KCPL who made decisions at each point in the timeline when important decisions were made. Public Counsel also recommends that the Commission order KCPL to perform the analyses listed in paragraph 5 of this pleading, any other analyses suggested by the Staff, and any additional analyses the Commission believes will be helpful. Only after the parties and the Commission can see the big picture can the parties and the Commission determine whether the transaction is detrimental to the public interest.

7. Once KCPL files its response and explains the entire transaction, its drivers, and its ramifications, the Commission should allow Staff and Public Counsel a final filing in which they recommend either approval of the transaction or proceeding to an evidentiary hearing.

WHEREFORE, Public Counsel respectfully submits this response and recommendation, and requests modification of the schedule to allow the additional filings discussed in paragraphs 6 and 7.

Respectfully submitted,

/s/ Lewis R. Mills, Jr.

Lewis R. Mills, Jr. (#35275)
Public Counsel
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(573) 751-5562 FAX
lewis.mills@ded.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 13th day of July 2010:

Missouri Public Service Commission
General Counsel Office
P.O. Box 360
200 Madison Street, Suite 800
Jefferson City MO 65102

Kansas City Power & Light Company
James M. Fischer
101 Madison Street, Suite 400
Jefferson City MO 65101

/s/ Lewis R. Mills, Jr.

Kind, Ryan

From: Kind, Ryan
Sent: Tuesday, July 27, 2010 2:14 PM
To: 'Rush Tim'; Dottheim, Steve; Williams, Nathan; Henderson, Wess; Mills, Lewis; Young, Mary Ann; 'stucon@fcplaw.com'; Mantle, Lena; Beck, Dan; Schallenberg, Bob; Wilbers, Brenda; Noller, John; Elliott, David; 'clumley@lawfirmemail.com'
Cc: Blanc Curtis; Grimwade John; 'jfischerpc@aol.com'; Steiner Roger
Subject: RE: KCP&L 32 WTG Spearville 2 Project - Request for Proposal EPC Contractor Services

Tim,

I learned today that the RFP that you are seeking feedback on had already been sent to potential respondents before you sent your email requesting OPC's feedback. Given the timing of your request for feedback, it's unclear how any feedback could be incorporated into KCPL's process for acquiring additional wind generation resources. Also, if KCPL is genuinely interested in receiving substantive feedback on an RFP, it cannot reasonably expect OPC to be able to provide such feedback within three business days as requested.

KCPL appears to be trying to satisfy the terms of the regulatory plan in Case No. EO-2005-0329 which included the following requirement:

"In order to provide more assurance that future generation or power supply, including Demand Side Management resources, are acquired at the most reasonable cost and to establish a benchmark of reasonable costs, KCPL agrees that its process for considering or acquiring future resources in addition to those contemplated by this Resource Plan shall include the issuance of a Request for Proposal (RFP) for the supply of such resource by competitive bid. **KCPL agrees to consult with the Staff and Public Counsel in the design and content of the RFP before it is issued."** [Emphasis added]

OPC would like to know why KCPL believes that providing the RFP to our office after the RFP has already been sent out is consistent with the terms of the regulatory plan in Case No. EO-2005-0329?

Public Counsel has most recently demonstrated our interest in reviewing how additional wind resources may fit into KCPL's resource plans through our filings and discovery requests in Case No. EO-2010-0353. OPC noted in paragraph 6 of its 7/13/10 RESPONSE TO ORDER REGARDING APPLICATION, RECOMMENDATIONS AND MOTION TO MODIFY PROCEDURE SCHEDULE (OPC's Response), that with respect to the transaction proposed in that case, "only after the parties and the Commission can see the big picture can parties and the Commission determine whether the transaction is detrimental to the public interest." OPC has similar "big picture" concerns with respect to the issuance of this RFP and any transactions and resource additions that may result from this RFP. Pubic Counsel noted in paragraph 5 of OPC's Response in Case No. EO-2005-0329 that "KCPL has not done (or has not provided) any analysis that compares its chosen course of action to: 1) continuing to hold the 32 turbines in storage; 2) putting the 32 turbines into service itself in 2010 or 2011 at the Spearville property (without additional turbines); 3) selling the turbines (without entering into a PPA); 4) selling the turbines and property rights (without entering into a PPA); 5) selling the turbines and entering into a PPA for only the 48 MW of wind from those turbines; or 6) any number of other possibilities." The "chosen course of action" referenced in OPC's Response was the transaction proposed by KCPL in Case No. EO-2010-0353. However, the above quote from OPC's Response is equally relevant to the "chosen course of action" that is implied by the already issued RFP which KCPL is seeking feedback on. Is KCPL able to provide OPC with some documentation of the analysis it performed on the range of options (i.e. the "big picture" perspective) that were reviewed prior to focusing the Company's efforts on the course of action in the RFP? If KCPL has not yet performed such an analysis, does it intend to perform this type of "big picture"

Attachment 3

analysis once it has received responses to this RFP that will permit the Company to better compare the RFP "course of action" to its other potential options?

Ryan Kind
573.751.5563

From: Rush Tim [mailto:Tim.Rush@kcpl.com]
Sent: Thursday, July 22, 2010 4:18 PM
To: Dottheim, Steve; Williams, Nathan; Henderson, Wess; Mills, Lewis; Young, Mary Ann; 'stucon@fcplaw.com'; Mantle, Lena; Beck, Dan; Schallenberg, Bob; Kind, Ryan; Wilbers, Brenda; Noller, John; Elliott, David; 'clumley@lawfirmemail.com'
Cc: Blanc Curtis; Grimwade John; 'jfischerpc@aol.com'; Steiner Roger
Subject: KCP&L 32 WTG Spearville 2 Project - Request for Proposal EPC Contractor Services

Many of you are aware that we have recently been planning to send an RFP to build the 32 wind turbines. Attached is the RFP for an EPC contract for the 32 wind turbines. Please let me know if you have any questions, concerns or corrections for the RFP. Note that the RFP has a very quick turnaround – next Tuesday.

Tim Rush
Kansas City Power & Light Company

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Kansas City Power & Light (KCP&L) is currently soliciting proposals for the Engineering, Procurement and Construction (EPC) of a 48 MW facility (Project) at KCP&L's Spearville 2 wind site, located adjacent to KCP&L's existing Spearville Wind Generating Facility in Ford County, Kansas.

KCP&L will supply Wind Turbine Generators, preliminary engineering drawings, existing studies, and other pertinent information. The successful bidder will be responsible for all engineering associated with the Project, all Balance of Plant Equipment (BOP) and BOP engineering, all construction activities pertaining to the erection of the 32 WTG's and BOP equipment and commissioning of said equipment.

This Project will require commitment to a Commercial Operation Date of December 15, 2010.

Please refer to the attached documents:

- EPC Request for Proposal
- Lump Sum Bid Form
- Contractor Safety Requirements

Package Notes:

1. With regard to the Non-Disclosure Agreement, KCP&L requests all bidders enter into the NDA prior to receiving access to an FTP site where preliminary engineering drawings, existing studies, and other pertinent information can be accessed. Please respond to this e-mail confirming your receipt along with a signed copy of the NDA, which is found as Exhibit 7 of the EPC Request for Proposal.

   Upon counter-signature, KCP&L will provide a copy of the fully executed agreement and instruction on how to access the FTP site.

2. RFP Response Due Date is **Tuesday, July 27th, 2010 by 5:00 PM (CDT).**

3. Bid pricing to be furnished as lump sum, fixed price only, which shall include all labor, applicable taxes, insurance, licenses, permits, tools, equipment, materials, services, supervision and incidentals necessary or required for the construction of the project.

4. KCP&L Terms and Conditions will be furnished under separate cover. Please note your bid will be classified as **non-compliant** if the KCP&L Terms and Conditions are not addressed with bid proposal and comments in tracked changes format for review.

5. During the Bid Period, all questions/clarifications shall route through the KCP&L Procurement contact listed below. Commercial and Technical issues will be logged, formally vetted through the appropriate KCP&L groups and then addressed and shared with **all bidders**. Formal Addenda will be issued to all bidders via e-mail and a signed acknowledgement of each will be returned as part of proposal.

6. KCP&L is a strong supporter of the development of diverse businesses and sets utilization goals to optimize the use of certified diverse businesses ("M/WBEs"). Bidder shall submit a detailed plan addressing how diverse supplier participation will be achieved in this Request for Proposal. It is KCP&L's expectation that the Bidder accomplish at least ten percent (10%) M/WBE (Minority and Women Owned Business Enterprises) participation on the total dollars spent in connection with the Work covered by this Request for Proposal. M/WBE participation will be used as a part of the overall evaluation of this Bid.

7. Please find attached, KCP&L's Contractor Safety Requirements (CSR) for review. Please read carefully prior to mobilization to fully understand our safety requirements. This is an "Evergreen" document and subject to change at any time due to regulatory changes or risk exposures. In turn, KCP&L will need to review your firm's safety program, prior to mobilization.

8. Please submit the following safety-related information with your Bid Proposal:

    - Safety Manager and up-to-date contact information.
    - Resume(s) of Safety Manager and health professionals assigned to project.
    - A copy of your written Safety and Health Program.
    - Safety statistics – (3) years of OSHA statistics from your 300 Log and EMR Rating from your insurance company.
    - A copy of written safety training documentation.
    - If adopted, a copy of your firm's Accident/Incident Investigation Program.

9. All correspondence up to formal contract award shall be directed to KCP&L Procurement:

Scott E. Nichols, Construction Procurement Manager
20256 Hwy 45 North
Weston, MO 64098
Scott.Nichols@KCPL.com

and

Robert Nicholas, KCP&L Construction Procurement
20256 Hwy 45 North
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Scott E. Nichols
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