

KCP&L  
Case Name: 2014 KCPL Rate Case  
Case Number: ER-2014-0370

Response to Williams Nathan Interrogatories - MPSC\_20150302  
Date of Response: 03/20/2015

Filed  
July 14, 2015  
Data Center  
Missouri Public  
Service Commission

Question:0459

1. Please describe specifically the activities and estimated costs by calendar year that are expected in the next four years for KCPL to comply with NERC CIP; i.e. engineering, construction, outside consulting, quality assurance, software, custom software development and programming, software verification and validation testing, reporting, auditing, equipment, etc. Please designate specifically those activities that will be under the control of KCPL and also those activities that are considered to be beyond the control of KCPL. DR requested by Randy Gross ([Randy.Gross@psc.mo.gov](mailto:Randy.Gross@psc.mo.gov)).

Response:

Included in the supporting excel file is a tab called 459 Support which shows the current KCP&L forecast for CIP and Cyber spending through 2017 (KCP&L only). This data is divided between CIP and Cyber spending; by company division; by FERC Account (with a brief description of the costs in the FERC account); and into totals for Labor O&M, Non-Labor O&M, and Capital.

The CIP forecast is based on NERC CIP standards which are already subject to enforcement and NERC CIP standards approved and subject to future enforcement. Projected costs are based on project planning for CIP version 5 which is still in process. The Cyber costs are based on current regulatory requirements, but are made with the understanding that Cyber Security is under constant and increasing scrutiny with regulatory rule making advancing from many different sources.

All activities, regardless of whether they are executed by KCP&L employees, contractors working for KCP&L, or 3<sup>rd</sup> part consulting firms working for the company, will be under the control of KCP&L. KCP&L is responsible for meeting NERC CIP Standards and cannot delegate that responsibility to any other party in the eyes of NERC.

**Information Provided By:** Josh Roper

**Attachment:**

Q0459\_CIP Tracker Data Requests March.xlsx  
Q0459\_Verification.pdf

Staff Exhibit No. 245  
Date 6/30/15 Reporter Jenni  
File No. ER-2014-0370