Kansas City Power & Light Company 2013 Annual Infrastructure Compliance Report Pursuant to 4 CSR 240-23.020

KCP&L Greater Missouri Operations Company 2013 Annual Infrastructure Compliance Report Pursuant to 4 CSR 240-23.020

Infrastructure Inspection and Maintenance Program

July 1, 2014

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Introduction

Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO") (collectively, "Companies"), submit their 2013 Annual Infrastructure Compliance Reports as required under the State of Missouri's *Electrical Corporation Infrastructure Standards*, 4 CSR 240-23.020 ("MoIR"). This report covers the period January 1, 2013, through December 31, 2013, incorporating by reference KCP&L and GMO's infrastructure compliance plans filed July 1, 2008.

The real-time monitoring reporting described in the 2013 edition of this report has not yet been implemented, as KCP&L and GMO work on sustainable and consistent method to leverage this approach. Development of that process remains ongoing and is a possibility in future years.

Distribution System Summary

KCP&L and GMO are aligned with the Overhead and Underground schedule set forth in the MoIR. Corrective action is taken immediately when conditions discovered during the course of inspections are identified as critical to safety or service reliability. Corrective work on conditions not rising to that critical threshold are bundled with future work—focusing on the urgency of improving performance of poorly performing feeders and laterals. No corrective action is taken when inspection reports are for information purposes only. Corrective work is also completed within the normal course of construction work.

In 2013, all KCP&L and GMO streetlights (including wood poles) were inspected concurrently with the Overhead Inspection Program and corrective action completed as required. This work satisfied the Patrol and Detailed Street Light Inspection requirements. Additionally in 2013, Intrusive Wood Pole Inspections were not scheduled in the KCP&L MO and GMO areas because the inspection cycle was moved ahead of schedule in 2012. All of the poles identified as "reinforceable rejects" were reinforced in 2013. Work started on replacement of non-reinforceable rejects and is planned to be completed on a pace to keep up with the continuing inspections.

KCP&L Area Inspections

All Overhead Patrol and Overhead Detailed Equipment inspections in the KCP&L service area were completed ahead of the required cycle prior to 2013. KCP&L began the second 4-year patrol cycle in 2013 as set forth in the MoIR. In 2012, KCP&L completed the first 4-year patrol cycle and 8-year detailed cycle of the Below Grade Manholes and Vault Inspections. Future inspections are aligned with the MoIR schedule. There were no Intrusive Wood Pole inspections scheduled for KCP&L's service areas in 2013. The inspection schedule in 2009 and 2011 allowed KCP&L to get ahead of the pace needed to achieve the 12-year cycle set forth in the MoIR.

Table 1: KCP&L Inspection Corrective Action Inspections							
	KCP&I	MO Distribution		Со	mpleted Throu	gh December 20	13
System Class	Inspection Type	Facility Type	Units	Inspections Scheduled (Annual Plan)	Inspections Completed	Inspections Completed Prior to 2013 (Ahead of Cycle Plan)	Inspections Pending Outside of Plan
		Overhead Circuits Structures & Equipment ¹	Structures	57,380	33,166 ²	179,560	0
	Patrol	Pad-mounted Equipment	Equipment Locations	0	0	15,555	0
		Underground Structures and Equipment	Structure Locations	0	0	3,603	0
Distribution		Overhead Circuits Structures & Equipment	Structures	0	33,395	184,898	0
	Detail	Pad-mounted Equipment	Equipment Locations	0	0	15,555	0
		Underground Structures and Equipment	Structure Locations	0	15	3,603	0
	Intrusive	Wood Poles	Poles	0	0	107,505	0

¹ Inclusive of conductors, transformers, reclosers, regulators, capacitors, switching/protective devices as required under the MoIR.

² Work not completed due to scheduling issues

GMO Area Inspections

All Overhead Patrol and Overhead Detailed Equipment inspections in the GMO service area were completed ahead of the required cycle prior to 2013. In 2013, GMO started the 2nd 4-year patrol cycle. The 8-year detailed cycle for the Below Grade Manholes and Vault Inspections were not completed. A schedule change was put in place to complete by the end of 2015. Future inspections will be aligned with the MoIR schedule. There were no intrusive wood pole inspections scheduled for GMO service areas in 2013. The inspection schedule in 2012 allowed GMO to get ahead of the rate needed to achieve the 12-year cycle set forth in the MoIR.

	Table 2: GMO Inspection Corrective Action Inspections							
		GMO Distribution	Complet	ed Through Decem	ber 2013			
System Class	Inspection Type	Facility Type	Units	Inspections Scheduled (Annual Plan)	Inspections Completed	Inspections Completed Prior to 2013 (Ahead of Cycle Plan)	Inspections Pending Outside of Plan	
		Overhead Circuits, Structures, Equipment and Street Lights	Structures	57,380	42,082 ³	291,959	0	
	Patrol Distribution Detailed	Pad Mounted Equipment	Pads	0	6,618	78,248	0	
Distribution		Underground Structures and Equipment	Structures	0	0	589	0	
Distribution		Overhead Structures, Circuits, Equipment and Street Lights	Structures	0	0	291,959	0	
		Padmount Equipment	Pads	0	0	78,248	0	
		Underground Structures and Equipment	Structures	0	115	589	0	
	Intrusive	Wood Poles	Poles	0	0	54,680	0	

³ Work not completed due to scheduling issues

	Table 3: Combined Distribution Equipment Rating Summary							
System Class	Inspection Type	Facility Type	Units	Immediate Repair or Next Day	Bundled for Future Work	Corrective Action not Required		
		Overhead Circuits Structures & Equipment ^a	Structures	0 (0.00%)	45,010 (37.68%)	119,453 (62.32%)		
Distribution	Detail	Pad-mounted Equipment	Equipment Locations	0 (0.00%)	14,087 (77.93%)	3,989 (22.07%)		
Distribution		Underground Structures and Equipment	Structure Locations	0 (0.00)%	126 (93.33%)	9 (6.67%)		
	Intrusive	Wood Poles	Poles	0 (0.00%)	366 (89.27%)	44 (10.73%)		

^a Inclusive of conductors, transformers, reclosers, regulators, capacitors, switching/protective devices as required under the MoIR.

	Table 4: Combined Distribution Corrective Action Summary						
System Class	Inspection Type	Facility Type	Component	CA Scheduled in 2013	CA Completed in 2013	CA Planned in 2014	CA Planned after 2014 ⁴
	Patrol and Detailed	Overhead Circuits Structures & Equipment, Street Lights	Structures	4,350	5,468	6,000	7,000
Distribution		Pad-mounted Equipment	Pads	522	702	350	400
Distribution	Patrol	Underground Structures and Equipment	Structures	80	80	80	191
	Intrusive	Wood Poles	Poles	950	934 ⁵	900	950

Corrective Actions Completed: The number of corrective actions completed on Worst Performing Circuits and is inclusive of corrective efforts such as: infrared inspections of splices, ground wire repairs, riser conduit repairs, arrester replacements, and, additionally, critical pole and cross arm replacements.

⁴ CA Planned after 2014 reflects the number of Corrective Actions planned on an annual basis through 2020.

⁵ Work not completed due to scheduling issues expected to be completed by the second quarter of 2014

Transmission System Summary

All KCP&L and GMO transmission lines are inspected annually by Aerial and Ground Patrol, as was the case in spring 2013. This schedule is more vigorous than that required under the MoIR. As shown in Tables 9 & 10, there were 221 combined corrective actions, based on patrols, completed in 2013. There are 81 combined corrective actions scheduled for 2014 completion.

A limited number of Detailed and Intrusive inspections were completed on transmission lines in the KCP&L service area. As shown in Table 5, in 2013, 23 poles were inspected, with 2 found as requiring corrective action. No detailed and intrusive inspections were performed in the GMO service area. As shown in Tables 9 & 10, there were 73 corrective actions, for the combined KCP&L GMO service areas scheduled for 2013 and 59 of those were completed in 2013. There are 24 corrective actions scheduled for 2014.

	Table 5: KCP&L Transmission Corrective Action and Equipment Conditions							
	KCP&L T	ransmission		Co	mpleted Thro	ugh December	2013	
						Inspections		
						Completed		
					Inspections	Prior to	Inspections	
				Inspections	Completed	2013	Pending in	
	Inspection			Planned for	During	(Ahead of	2013 Outside	
System Class	Type	Facility Type	Units	2013	2013	Plan)	of Plan	
		Overhead						
		Circuits						
	Aerial and	Structures &						
	Ground	Equipment	Structures	7,316	7,316	0	0	
	Patrol ^a	Underground						
		Structures and						
		Equipment	Structures	34	34	0	0	
	Detail and	Wood/Steel						
Transmission	Intrusive	Poles	Poles	0	23	0	0	

^aAerial patrols of the transmission system are completed annually.

Ta	ble 6: GMC	O Transmissio	on Correcti	ve Action an	d Equipmer	nt Condition	S
	GMO Tra	nsmission		Con	npleted Throug	gh December 2	2013
				Inspections	Inspections Completed	Inspections Completed Prior to 2013	Inspections Pending in 2013
	Inspection	Facility		Planned	During	(Ahead of	Outside of
System Class	Type	Type	Units	for 2013	2013	Plan)	Plan
	Aerial and	Overhead Circuits Structures & Equipment	Structures	14,773	14,773	0	0
Transmission	Ground Patrol ^a	Underground Structures and Equipment	Structures	14,773	1	0	0
	Detail and	Wood/Steel					

Intrusive Poles Poles 0 0 0

aAerial and ground patrols of the transmission system are completed annually

Tabl	Table 7: KCP&L Transmission Equipment Condition Rating Summary							
System Class	Inspection	Facility	Component	Repairs	Schedule	Corrective		
	Type	Type		Completed	for Repair	Action		
				Within	Within	Not		
				12-Months	12 to 36	Required		
					Months			
Transmission		Overhead	Poles,	7	116	7,193		
			Switches.	(0.10%)	(1.59%)	(98.32%)		
	(Aerial and	Underground				34		
	Ground Patrol	Structures	Manholes.	-	-	(100%)		
Transmission		Poles and	Poles					
	Detail and	Structures -		2	0	21		
	Intrusive	Wood/Steel		(8.70%)	(0.00%)	(91.30%)		

Table 8: GMO Transmission Equipment Condition Rating Summary System Class Inspection Facility Component Repairs Schedule Corrective Type Completed for Repair Type Action Not Within Within Required 12-Months 12 to 36 Months 5 Transmission Overhead Poles, 74 14,694 (Aerial and Switches. (0.03%)(0.50%)(99.47%) Ground Underground Patrol Structures Manholes. 0 0 100% Transmission Poles and Poles Structures -0 0 Detail and 0 (0.00%)(0.00%)Intrusive Wood/Steel (0.00%)

r	Гable 9: К(CP&L Transn	nission Corre	ective Action	on (CA) Sur	mmary	
System Class	Inspection Type	Facility Type	Component	CA Planned in 2013	CA Completed in 2013	CA Planned in 2014	CA Planned after 2014
Transmission	(Aerial and Ground Patrol)	Overhead Structures & Equipment	Poles, Switches	7	113	41	41
Transmission	(Aerial and Ground Patrol)	Underground Structures and Equipment	Manhole	0	0	0	0
Transmission	Detail and Intrusive	Poles and Structures - Wood/Steel	Poles	59	45	14	30

	Table 10: (GMO Transm	ission Corre	ctive Actio	on (CA) Sum	nmary	
System Class	Inspection Type	Facility Type	Component	CA Planned in 2013	CA Completed in 2013	CA Planned in 2014	CA Planned after 2014
Transmission	(Aerial and Ground Patrol)	Overhead Structures & Equipment	Poles, Switches	5	108	40	0
Transmission	(Aerial and Ground Patrol)	Underground Structures and Equipment	Manhole	0	0	0	0
Transmission	Detail and Intrusive	Poles and Structures - Wood/Steel	Poles (treated or replaced)	14	14	10	11

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

<u>VERI</u>	IFICATION
State of Missouri)) ss
County of Jackson)
that I am authorized to make this affid Company and KCP&L Greater Misso	r affirmed according to law, depose and hereby state lavit on behalf of Kansas City Power & Light uri Operations Company, as Executive Vice r, and that the facts above set forth are true and information and belief.
	Scott Heidtbrink Kansas City Power & Light Co.
Subscribed and affirmed befor	re me this 30 th day of June, 2014.
	Notary Public
My Commission Expires:	
FUb. 4, 2015	NICOLE A. WEHRY Notary Public - Notary Seal State of Missourl Commissioned for Jackson County My Commission Expires: February 04, 2015 Commission Number: 11391200