Kansas City Power & Light Company
2010 Annual Missouri Vegetation Management Report
Pursuant to 4 CSR 240-23.030

KCP&L Greater Missouri Operations Company
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TRANSMISSION and DISTRIBUTION RIGHT-OF-WAY VEGETATION MANAGEMENT PROGRAM

April 1, 2011

This program document applies to vegetation maintenance of Kansas City Power & Light Company's ("KCP&L") and KCP&L Greater Missouri Operations Company's ("GMO") transmission and distribution power lines. It meets the requirements of the Missouri Public Service Commission Rule 4 CSR 240-23.030 *Electrical Corporation Vegetation Management Standards and Reporting Requirements*. KCP&L, by operating agreement, provides vegetation management services to GMO.

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Highly Confidential Information and Data

This report contains information that falls under the definitions of Confidential Information, Critical Energy Infrastructure Information, and/or Critical Infrastructure under the *Rules of Procedure of the North American Electric Reliability Corporation,* Section 1500. In light of the requirements to maintain the confidentiality of information and data that falls under Section 1500, portions of this report are marked as Highly Confidential.

1.0 Introduction

Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company's ("GMO") Transmission and Distribution Vegetation Management Program ("Program") report presents the strategy, key processes, and guidelines for orderly, uniform, safe, and efficient management of KCP&L's and GMO's overhead delivery systems. The report reflects vegetation management performed in 2010 and planned for 2011; also, the report describes removal, trimming and spraying methods. The Program is dynamic in nature and, at times, requires adjustment to conform to performance as measured by tree-related service reliability; to take advantage of opportunities to gain efficiency; to incorporate customer feedback; to address changes in regulatory initiatives; and to address other program drivers.

2.0 Safety and Reliability

KCP&L and GMOs' Transmission and Distribution vegetation management program promotes safe and reliable electric service. Beyond compliance and requirements of a robust vegetation maintenance program under 4 CSR 240-23.030 and the National Electric Safety Code Vegetation Management Section 218 (2007), regular vegetation management mitigates service interruptions and reduces potentially dangerous conditions, like downed power lines.

Crews performing vegetation management working on or near KCP&L and GMO facilities, rights-of-way ("ROW"), or easements are required to follow approved safety guidelines and procedures. Contractors performing vegetation management work are contractually required to comply with government safety and health regulations and KCP&L's own safety and health standards.

Contractors must, prior to work commencing and at all times during the course of their work, have processes and procedures in place to maintain awareness of the nature and characteristics of KCP&L's and GMOs' electric facilities. Foundational to safety is the contractors' understanding that KCP&L's and GMOs' electric facilities are energized during the performance of their work unless, prior to the work commencing, arrangements are made with an authorized KCP&L representative to de-energize the facilities.

KCP&L and GMO are pleased to report that in 2010 no incidents occurred resulting in death or life-threatening or serious injury to persons assigned to perform vegetation management activities or to the public.

3.0 Vegetation Manager

KCP&L employs a vegetation manager to oversee KCP&L and GMOs' vegetation management program, ensuring regulatory compliance and implementation of the program described in this report.

4.0 Distribution Vegetation Management Program Strategy

4.1. Program Objectives

The Program's distribution system objectives are: to promote and maintain safe operation of the distribution system; to support system reliability; to ensure optimum use of resources; and to ensure compliance with regulatory requirements. The Program seeks to achieve these objectives, and reduce outage risk, by managing vegetation; trees, and other vegetation, left unmanaged, impact the number of service interruptions and service restoration efficiency. The Program strategy focuses on maintenance activities that reduce outage risks associated with trees growing into distribution lines and risks associated with trees breaking and then falling onto distribution lines.

4.2. Maintenance Scheduling Strategy

The Program's maintenance scheduling strategy considers: time-based maintenance intervals; voltage; historical reliability; potential vegetation interference of energized lines; and a comparison from year-to-year of the impact on safety and service reliability. Maintenance cycles of distribution lines are based on customer density—urban versus rural[1]. Mid-cycle line inspections of primary distribution lines are scheduled to identify conditions requiring maintenance in advance of the regular primary cycle.

Table 1: Missouri Cycle Lengths in Years

Circuit Description	Primary Cycle Length (Years)	Mid-cycle Inspection/selective Tree Maintenance (Years)
Urban Circuits	4	2
Rural Circuits	5 to 6	2 to 3

Primary maintenance cycles result in maintenance of 25-percent of total urban distribution miles on an annual basis and 25-percent of rural distribution miles on an 18-month cycle.

[1] Urban circuits are defined as those with customer density equal to or greater than 35 customers per line mile. Rural circuits are defined as those with customer density less than 35 customers per line mile. 4 CSR 240-23.030(1)(G) and (J).

4.3. Tree Selection Criteria

KCP&L uses a strong prescriptive maintenance approach to tree selection. Professional utility arborists are assigned to create work plans designating specific vegetation for pruning, removal, or treatment by contract crews. Trees are selected based on risk factors, avoiding indiscriminate and wholesale maintenance decisions simply based on a fixed-distance-from-conductors criterion. Trees selected for pruning or removal are characterized as exhibiting observable and predictable threats that pose significant threats to service reliability. Also, trees exhibiting only some of the risk factors may be pruned or removed in anticipation of impacting service reliability.

General selection criteria for tree maintenance include:

- Potential to cause service interruption by growth into or across energized conductors prior to the next scheduled inspection or trim cycle;
- Obvious defects that predispose the tree to failure and damage to electrical facilities; and/or,
- Dead or broken branches hanging over electrical facilities.

Selection factors considered include:

- The natural growth rate of the tree;
- The expected re-growth rate following pruning of the tree;
- The relative wood strength of the tree species and potential for breakage;
- Voltage, construction type, conductor spacing, and conductor covering;
- Legal right to access the area;
- Extent of defects (decay, splits, weak branch attachments, etc.), customers served by the line, and potential for tree limbs or trunks to strike primary conductors in the event they break or fall; and/or,
- Sag of conductors at elevated temperatures and under wind and ice loading and combined displacement of vegetation, supporting structures, and conductors under adverse weather or routine wind conditions.

Trees affecting secondary service lines are the property owner's responsibility and not normally maintained. However, as part of the primary scheduled maintenance cycle, trees growing into service lines may be maintained to avoid deflection of secondary voltage conductors by tree limbs.

4.3.1. Tree Removal (trees larger than 4 inches diameter)

Tree removal, together with stump treatment to prevent resprouting, provides permanent clearance, eliminates the potential for removed trees to break and cause damage, and reduces future maintenance costs. However, neither is it practical, environmentally desirable, or welcomed by property owners to remove all trees that effect power lines. Consequently, designation of trees selected for removal is based on cost effectiveness, failure risk, and signed permission of the property owner.

Trees may be designated for removal if:

- Pruning will result in a significant adverse impact on the health of the tree;
- The tree is a hazard tree that poses an unacceptable risk to overhead lines; and/or,
- It is economically advantageous to remove rather than periodically prune the tree.

4.3.2. Hazard Trees

Structurally unsound trees, on or off the easement or ROW, that can fall into electrical conductors are evaluated for possible removal. Hazard tree conditions can include, but not limited to, the following symptoms:

- Dead or dying
- Severe lean
- Weak branches
- Root failure
- Cankers
- Conks (fungal fruiting bodies)
- Internal decay

4.3.3. Brush and Vines (trees smaller than 4 inches diameter)

Removal and/or treatment of small-size brush with herbicides is a cost effective method of reducing future maintenance costs before the brush grows large enough to affect power lines. Brush growing below conductors is designated for removal and stump treatment, mowing, foliar treatment, or individual stem treatment prior to growing to wire height and when it can be cost effectively treated. Vines observed growing on poles and guy wires are selected for cutting and treatment with approved herbicides. Pruning brush should be avoided.

4.3.4. Integrated Vegetation Management (IVM)

KCP&L utilizes principles of Integrated Vegetation Management ("IVM") to control brush on distribution ROW. IVM is an approach

that considers the use of mechanical mowing, hand cutting, and herbicide applications, together with the benefits of biological control to manage undesirable woody vegetation on a ROW. The responsible, targeted use of herbicides, is an important component of this approach.

Foliar application of herbicides for control of ROW brush on ROW, as well as basal and cut stump methods, will be used when appropriate. Cut stumps should be treated with an effective herbicide mixture to prevent resprouting. Small diameter brush stumps should be treated unless a follow-up foliar application is definitely scheduled.

In rural locations, herbicide application may be scheduled to occur 1 to 2 years in advance of tree maintenance. Brush stems missed during herbicide application can be retreated or cut during the tree maintenance cycle. If brush is too tall to control with herbicides and requires hand cutting or mowing, herbicide application should be scheduled approximately one growing season following cutting.

4.4. Contracting Strategy

KCP&L contracts with several utility tree maintenance contractors as opposed to performing vegetation maintenance exclusively with its own personnel. Contracts are written to combine time and equipment with performance-based components.

4.5. Customer Relations

4.5.1. Customer Inquiries

Customer inquiries generated through KCP&L's Customer Care Center, or other channels, are responded to by the appropriate vegetation management individual by personal meeting, telephone, or letter. Requests for tree trimming, removal assistance, or other requests are evaluated by inspection prior to assignment of work to a maintenance crew. Service provided to customers who request assistance with tree removal for the customer's convenience, normally includes removal of overhanging branches and all limbs within ten feet of energized conductors. Any debris is left at the worksite.

4.5.2. Property Owner Notification

KCP&L notifies affected property owners or occupants of pending tree maintenance. Notification is by a combination of personal contact, door hangers, or mailings at least seven, but not more than, ninety days prior to performing scheduled maintenance.

4.5.3. County and Municipal Notification

KCP&L notifies appropriate county and municipal officials in writing at least two months in advance of planned vegetation management work in their respective jurisdictions. The notice includes planned dates and locations of scheduled vegetation maintenance and other information relevant to the particular municipality or county. The primary contact for each municipality or county is selected by mutual agreement between KCP&L and the highest elected official in the jurisdiction or highest appointed official if there is no elected official.

4.5.4. Public Outreach

KCP&L provides information to the public through its Website, publications, and community events, regarding its vegetation management program and appropriate trees to plant near overhead lines. Also, KCP&L annually mails information to KCP&L and GMO customers regarding vegetation management.

4.6. Vegetation Management Practices

4.6.1. Industry Standards

Vegetation management contractors are required to comply with federal, state and local laws and regulations, including those of the U.S. Occupational Safety and Health Administration. Also, vegetation management contractors are required to follow industry safety standards such as, the *American National Standards Institute (ANSI) Z133.1 – 2006, Pruning, Trimming, Repairing, Maintaining, and Removing Trees and Cutting Brush – Safety Requirements, 2006*. *ANSI A-300 (Part 1) - 2001 Tree, Shrub and Other Woody Plant Maintenance – Standard Practice*s—a requirement as it applies to utility tree pruning. Furthermore, contractors are required to implement the pruning concepts presented in the booklet, *Pruning Trees Near Electric Utility Lines*, by Dr. Alex L. Shigo.

4.6.2. KCP&L Vegetation Management Guidelines and Clearance Standards

KCP&L Vegetation Management Guidelines, Appendix A, provide guidance to the performance of work by the vegetation management contractors. Included as part of the guidelines are standards for clearance at the time vegetation is maintained. For conductors energized at 600 to 50,000 volts, the minimum required clearance is ten-feet or clearance to the edge of the ROW, whichever is less. Mature trees, whose trunks or limbs have sufficient strength and rigidity to prevent the trunk or limbs from damaging the conductor under reasonably foreseeable wind and weather conditions, may be retained within ten-feet of conductors.

4.6.3. Post-Work Inspection and Acceptance

KCP&L, as part of its contract management process, inspects work following completion by vegetation maintenance contractors and prior to final acceptance. This inspection/audit process ensures the work performed is of acceptable quality, completeness, and consistent with work plans and specifications.

4.7. Reports and Record Keeping

4.7.1. Operational Reporting

Complete records and reporting are important to effective management of vegetation management programs. Records are maintained to identify key aspects of the vegetation management program, to document program performance, and provide information necessary for ongoing program management, including:

- Completed work data (substation and circuit designation, date worked, crew size, supervisor and type of work performed);
- Cost metrics (cost per mile, cost per circuit, scheduled work, reactive work, etc.);
- Contractor performance (man-hours per unit, miles completed, schedule attainment, etc.);
- Schedule of future work by substation and circuit; and,
- Safety hazards encountered by contractors and OSHA reportable events or accidents.

4.7.2. Regulatory Reporting

KCP&L and GMO submit quarterly and annual reports to the Missouri Public Service Commission ("MPSC"). The quarterly report is submitted approximately six weeks after the quarter ends. It is required under the terms of KCP&L's and GMO's *Non-Unanimous Stipulation and Agreement* (Case Nos. ER-2008-0089, ER-2009-0090, respectively.), and provides data regarding Program expenditure, miles planned, and miles completed on the distribution and transmission systems.

The annual report—the instant report—is filed with the MPSC on or before April 1st of each year pursuant to 4 CSR 240-23.030. It summarizes the vegetation management program success for the previous year, a plan for the current year, and an affidavit, verified by an officer with knowledge of the matters stated therein. Similarly to the quarterly reports, the annual report includes:

- vegetation management expenditures for the preceding year;
- vegetation management budget for the current year;
- circuits, completion dates, and miles trimmed in the preceding year;

- circuits, completion dates, and miles scheduled for the current year; and,
- total distribution miles for the system and corresponding classification between rural and urban.

The Companies understand material changes contemplated in vegetation management scope, guidelines, or standards are to be filed with the MPSC not later than thirty (30) days prior to implementing the change, and verified by affidavit of an officer with knowledge of the matters stated therein. Additionally, the Companies will report to the MPSC a failure to meet requirements under the *Electrical Corporation Vegetation Management Standards and Reporting Requirements* (4 CSR 240-23.030) within 30 days of discovery and include a mitigation plan for the irregular operation.

AFFIDAVIT OF WILLIAM P. HERDEGEN, III

STATE OF MISSOURI)
) **ss**
COUNTY OF JACKSON)

William P. Herdegen, III, being first duly sworn on his oath, states:

1. My name is William P. Herdegen, III. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Vice President, Transmission and Distribution Operations.

2. I have knowledge of the matters set forth in *KCP&L Greater Missouri Operations Company 2010 Annual Missouri Vegetation Management Report Pursuant to 4 CSR 240-23.030.*

3. I hereby swear and affirm that the report is true and accurate to the best of my knowledge, information and belief.

WILLIAM P. HERDEGEN, III

Subscribed and sworn before me this 31st day of March 2011.

Notary Public

My commission expires: Oct 6, 2013

ANNETTE G. CARTER
Notary Public - Notary Seal
Comm. Number 09779753
STATE OF MISSOURI
Jackson County
My Commission Expires: Oct. 6, 2013

5.0 APPENDICES

APPENDIX A – KCP&L's and GMO's DISTRIBUTION LINE CLEARANCE GUIDELINES

About This Guideline

KCP&L's and GMO's Distribution Line Clearance Guidelines ("Guidelines") are intended as a contractor's guide to implement KCP&L and GMOs' Distribution Vegetation Management Program. The Guidelines' underlying principle is that each tree, and tree species, has its own unique growth pattern, condition, proximity to conductors, structures and other obstacles, and will require the exercise of professional judgment in implementing the guidelines.

The Guidelines apply to vegetation management of KCP&L's and GMOs' distribution system, including voltages from 600 to 35,000 Volts.

Note: *The Guidelines are not intended as personal safety guidelines*[1].

(1) Introduction

A copy of the Guidelines and the book, *Pruning Trees Near Electric Utility Lines*, by Dr. Alex L. Shigo shall be kept on each crew truck and available at every work location.

The Distribution Vegetation Management Program (hereinafter called the "Program") objective is to help maintain safe, reliable, and least cost electric service, while complying with all regulatory requirements. The Program helps achieve this overall objective by efficiently managing vegetation to reduce outage risk. Left unmanaged, trees and other vegetation can become a leading source of power interruptions during non-storm events and can delay outage restoration associated with major and regular weather events. The Program's strategy focuses on maintenance activities that help reduce tree-caused outage risks associated with trees that grow into lines and risks associated with trees breaking and falling onto lines.

The objectives of the Program are to be achieved within the framework of positive customer relations and using sound environmental practices. The Program also provides incentives to the Contractor to exceed specific production and quality criteria. On the other hand, the Program penalizes Contractors for failing to maintain specific production and quality criteria. KCP&L, and/or its designated representative, is exclusively responsible for program oversight.

(2) Line Clearance Guidelines

(A) Pruning and Removal Guidelines

[1] While the Guidelines may comment on safety issues, Contractors and their crews performing vegetation management work on or near KCP&L and GMO facilities, rights-of-way, or easements are contractually required to follow government safety and health regulations and KCP&L's own safety and health provisions.

All tree pruning shall be governed by approved principles of modern arboriculture and shall adhere to industry standards, including, ANSI A-300 and Z-133 standards and the natural pruning method. KCP&L representatives, in certain cases, can grant exceptions to these pruning standards where mechanical trimming equipment is used. Pruning shall be done in a manner that protects current tree health and with regard for future growth and development.

(B) Voltages

1. Vegetation management for voltages of (35,000) volts and higher are considered to be Transmission voltages and are deferred to the Transmission Program.
2. Vegetation management for distribution lines energized at 35 kV and below are maintained by the Program. Primary voltages range from 600 to 34,500 Volts, and are further defined as follows: Backbone consists of (3) energized conductors, and Lateral consists of (1) or (2) energized conductors. Conductors with voltages of less than 600 Volts are considered Secondary voltage. The neutral wire has the potential to carry primary voltage, which CONTRACTOR shall take into consideration when clearing primary lines.

(C) Clearance for Primary voltages

1. For primary conductors, radial clearance to be achieved at the time of maintenance is 10 feet.
2. Sub-transmission lines and Backbone lines shall be trimmed vertically to remove overhanging limbs to the widths prescribed in paragraphs (2)(C)1.
3. Any tree affecting or potentially affecting a primary distribution line shall be trimmed to help maintain reliable service. The following factors are considered during the clearance process: The natural growth rate per species; The re-growth rate of the tree species (how fast the branches grow back after pruning), see Section 9 “Tree Re-growth Rates”; The wood strength of the tree species (what is the chance of the branch breaking under the load of strong wind, snow, ice); the voltage conducted by the line (the risk presented by the branch contacting the line; the higher the voltage, the greater the risk); branches rubbing insulated wires and broken or hanging tree branches.
4. The radial clearances in subsection (2)(C) are minimum clearances that should be established between the vegetation and the energized conductors and associated live parts where practicable. Vegetation management practices may make it advantageous to obtain greater clearances than those listed. In the event that the specific trimming conflicts with any other materials within this section, the strictest rules shall apply.
5. Notwithstanding any provision to the contrary in this section (2), mature trees whose trunks or limbs have sufficient strength and rigidity to prevent the trunk or limbs from damaging the conductor under reasonably foreseeable wind and weather conditions are exempt from the minimum clearance requirements in this section (2).
6. Minimum clearances may be subject to limitations of right-of-way width or legal access.
7. All dead wood shall be removed when it is a risk to conductors or when the KCP&L directs the CONTRACTOR to do so.

(D) Clearance considerations for Secondary Conductors, (600) volts or less

1. Open Wire secondary shall be cleared to the same standards as lateral primary conductors.
2. Triplex, street light and service lines shall be cleared only to remove **hard contact**, or deflection of the line's intended path.
3. All dead wood shall be removed when it is a risk to conductors or when the KCP&L directs the CONTRACTOR to do so.

(E) Clearance considerations for other electrical equipment

1. The neutral wire has the potential to carry primary voltage, which CONTRACTOR shall take into consideration when clearing primary lines.
2. Guy Wires and poles shall be cleared on a case by case basis as determined necessary during field inspection, to free them from weight, strain, or displacement caused by contact with trees.
3. All dead wood shall be removed when it is a risk to conductors or when the KCP&L directs the CONTRACTOR to do so.

(F) Removal Considerations for trees greater than 4" DBH

1. If the amount of tree crown to be removed in order to obtain adequate clearance will have an adverse impact on the overall long term health of the tree, the tree will be considered for removal.
2. Tall-growing trees within the width of the right-of-way shall be considered for removal.
3. Hazard trees that pose a risk to the utilities overhead facilities shall be considered for removal. Hazard tree conditions could include, but are not limited to the following symptoms: Dead or dying, severe lean, weak branches, root failures, cankers, conks or internal decay.
4. All removed trees should be cut as close to the ground as practical and chemically treated to prevent resprouting.
5. Trees where the cost of removing is equal to or less than the cost of trimming shall be considered for removal.

(G) Brush considerations

1. Brush is defined as any tall growing tree that is less than 4" DBH. Brush also includes vines growing on or around KCP&L and GMOs' overhead facilities.
2. Brush that has been planned to be removed shall be basal treated or cut as close to ground level as practical and chemically treated to prevent resprouting.
3. Vines shall be cut off approximately one foot above ground level. All vines shall be treated with herbicides below the cut.
4. Brush (as defined in (2)(G)1) that has been selected for removal and is located within the width of the right-of-way shall be removed and treated.
5. Second growth from stumps cut on previous pruning cycles shall be removed if it has been planned.

(H) Debris disposal

1. Unless specified otherwise, CONTRACTOR shall dispose of all debris resulting from scheduled maintenance work. Wood too large to be chipped shall be cut

into fireplace lengths (approximately 18” lengths) and stacked on-site unless the homeowner requests the wood to be removed.
2. CONTRACTOR shall remove all debris produced from scheduled maintenance within 5 business days, unless property owner gives consent to leave debris.
3. Disposal of chips, wood and brush is the responsibility of the contractor.
4. Any debris resulting from outages and/or storms will be left on site.

(I) Herbicide treatment

1. The CONTRACTOR shall provide all necessary herbicide products and comply with applicable Laws regarding the application, storage and handling.
2. The CONTRACTOR shall use the most effective herbicide available for any given situation to prevent regeneration of vegetation and subject to approval by KCP&L. The applicable MSDS shall be submitted as part of the approval process. Herbicides shall be applied according to manufacturer instructions. Consideration must be given to the surrounding vegetation and soil conditions to prevent damage to other growth or surface water or ground water.
3. CONTRACTOR shall warranty herbicide treatment for one (1) year after application and remedy any new growth identified.

(3) Maintenance Cycle

(A) Missouri Maintenance Cycle

1. Urban circuits are defined as circuits with a customer density equal to or greater than 35 customers per line mile.
2. Rural circuits are defined as circuits with customer density less than 35 customers per line mile.
3. Urban circuits, both backbone and lateral, shall be maintained on a four (4) year cycle.
4. Rural circuits, both backbone and lateral, shall be maintained on a five (5) or six (6) year cycle.
5. Urban circuits shall be inspected every two (2) years. Where needed, vegetation maintenance will occur in a timely manner.
6. Rural circuits shall be inspected at least every three (3) years. Where needed, vegetation maintenance will occur in a timely manner.

(4) Outage/Storm Response

(A) On-Call/Call Out

1. In the event of an emergency and when specifically requested by KCP&L, contractors shall provide crews to perform work after hours and on week-ends and holidays, as necessitated by the emergency. Work that is unrelated to the restoration of reliable electric service shall not be performed. On such emergencies, only essential work (i.e. no chipping of brush) shall be done per tree as required to restore electric service rapidly.
2. If necessary a Vegetation Management Supervisor will report to dispatch headquarters to aid in the dispatching of tree crews.

3. Improper pruning during outage/storm response work may occur due to unsafe conditions.
4. Fallen trees, broken limbs and all trimmings and cut vegetation associated with service restoration are left on site. Crews shall not inform customers that KCP&L will return at a later day to clean up the trimmings and cut vegetation.

(5) Customer Request Process

(A) Customer requests

1. Customer requests generated from KCP&L's call center or other designated source are managed by the vegetation management staff. Customer requests can include but are not limited to: Trim for Line Clearance; Customer Assisted Removal; Check for Drop Service; Pick Up Brush.
2. Customer requests will be inspected and the customer will be notified with the specific action that will be taken.
3. Under some circumstances, a customer request may be answered by a standard letter.
4. Response time to customer requests will vary depending on the number of requests in the system and the type of work required.
5. When necessary and with customer consent, brush will be left on-site.
6. For customer requested assistance for tree removal, any tree(s) to be removed by customer will have all overhang removed and ten feet (10') of clearance from all energized conductors will be provided.

(6) Notification Process

(A) Landowner Notification

1. For regularly schedule maintenance, customers will be notified in person or by door card with appropriate contact number, by a KCP&L representative. Questions regarding the scheduled work will be answered at this time. Notice to affected property owners or occupants will occur at least seven (7) days, but not more than ninety (90) days, prior to performing planned vegetation maintenance. Alternative notification methods may include direct mail, postcard or bill insert. KCP&L shall maintain a record of the dates, content, and addresses to which all notices provided were given until the subsequent scheduled vegetation management cycle has occurred for each affected property owner or occupant.
2. KCP&L and or its representative must secure signed permission to remove any tree equal to or greater than 4" DBH.
3. If vegetation management is necessary and the landowner refuses permission, the concern will be addressed by KCP&L and or its representative.
4. The vegetation manager's name and contact information is posted on KCP&L's website and is included on all notifications in the state of Missouri.

(B) Public notification

1. KCP&L shall provide written notice of any pending vegetation management activities to a primary contact for each county and municipality affected. The primary contact shall be selected by mutual agreement between KCP&L and the highest elected official, or if no elected official, then the highest appointed official, of the county and municipality.
2. Notice shall be made in writing to the primary contact designated under subsection above (6)(B)1, at least two (2) months in advance of the planned vegetation management. This notice shall include the planned dates and locations of the vegetation management.

(7) Contractor Guidelines

(A) Appearance and Conduct

All contract line clearance workers shall maintain professional appearance and conduct and shall adhere to the following guidelines. The following guidelines are neither intended to be nor should they be considered to be inclusive. The contractor:

1. shall be courteous to customers at all times;
2. shall not engage in "horseplay" while on the job;
3. shall not use language that is profane, boisterous, derogatory, racial, or of an ethnic nature;
4. shall not display sexually suggestive objects or pictures, such as t-shirts, magazines, calendars or posters;
5. shall not use customers' property (i.e. patios, picnic tables, etc.) for breaks;
6. shall not leave refuse from lunches, etc. on private or public property;
7. shall not enter the customer’s house;
8. shall refrain from climbing over or standing on any fence, garage, tool shed, etc. unless absolutely necessary to access work and only when it can be done safely and without damaging customers' property;
9. shall not solicit private work, including tree work, while performing work pursuant to this Contract;
10. shall not obligate KCP&L to make any payments to another party, nor make any promises or representations of any nature to another party for or on behalf of KCP&L/GMO;
11. shall maintain neat appearance at all times and;
12. shall wear clothing and hard hat displaying CONTRACTOR’s color and/or emblem.

(B) Supervision

1. The CONTRACTOR shall ensure that it has adequate supervisory personnel on the property to ensure that all of the CONTRACTOR's crews on the property are properly supervised. CONTRACTOR’s personnel shall provide the interaction and communication with KCP&L as required by this Contract. Such supervisory personnel shall be called "General Foremen" in these guidelines.
2. All contract supervisors and General Foreman will be Certified Arborists through the International Society of Arboriculture (ISA). Employees currently in these positions will have six months to obtain the certification; newly assigned

supervisors and general foreman shall obtain their certification within twelve months.

(C) Identification

All General Foreman and Crew Forman shall possess identification stating employee name, employer, as well as documentation stating the contractor is providing vegetation management services for KCP&L.

(D) Employment expectations

1. CONTRACTOR shall conduct pre-employment and random drug and alcohol screening to detect the presence of amphetamines, cocaine, marijuana, opiates, and phencyclidine, at no additional cost to KCP&L.
2. CONTRACTOR shall conduct pre-employment background check for felony criminal convictions and motor vehicle violations for all states of residency within the past five (5) years, at no additional cost to KCP&L.

(E) Vehicles

1. All vehicles and equipment shall be in good working condition, kept clean and organized at all times, maintaining a professional appearance. All trucks shall clearly display CONTRACTOR markings and vehicle numbers. Truck numbering should be visible from both side and the back. Also, the numbering should be large enough to be legible from a distance commonly encountered in traffic, i.e., several car lengths or across a four-lane intersection.
2. Each General Foreman and Crew shall be equipped with a two-way communication device at no additional cost to KCP&L. If radios are supplied by KCP&L, the contractor will replace all lost or stolen radios.
3. Cones will be placed at a highly visible area (street intersections, driveways, alleys, etc.) when a crew's work location is not readily detectable.

(F) Time Fulfillment

1. All work shall be performed Monday through Friday, except under special circumstances as agreed by KCP&L. The CONTRACTOR and KCP&L shall mutually agree to the working hours in accordance to IBEW local 53. Any approved overtime shall be paid at the rates set forth in contract, depending on the circumstances, by KCP&L for any work performed in excess of 40 hours per week.
2. While on **stand-by**, crew(s) shall be dumping chips, fueling trucks, maintaining chainsaws, and engaging in other productive duties. *Crews sitting for the **2-hour show up time** shall not charge time towards their perspective equipment*.
3. Holidays - CONTRACTOR may, upon receipt of permission from KCP&L, work at straight time on any KCP&L-observed holiday.

(G) Certification and permits

The CONTRACTOR shall acquire all certifications and permits required by local, county, municipality, state, tribal and federal agencies in which the CONTRACTOR's crews will be performing work pursuant to this Contract.

(H) Refusal/Access

1. In the event that the CONTRACTOR encounters conditions prohibiting performance of Work, the crew foreman will make, and document on Work Log, all reasonable efforts to secure access. CONTRACTOR shall notify KCP&L after all reasonable efforts to secure access have failed. A locked gate shall not, in and of itself, constitute “No Access”. CONTRACTOR shall not be entitled to additional compensation for No Access.
2. In the event that a property owner refuses access to the work scheduled, the crew foreman will notify KCP&L and move on to the next job site. Work will not be performed until KCP&L has notified the CONTRACTOR that access has been granted.

(I) Reporting

The CONTRACTOR shall collect and report key aspects of the vegetation management program to document program performance and provide information necessary for ongoing program management including:

1. CONTRACTOR Weekly Work Log
2. Weekly TRES timesheets
3. Daily Crew Locations
4. A record of any safety hazards encountered
5. Any unexpected occurrence or accident resulting in death, life-threatening or serious injury to a person assigned to perform vegetation management activities or the public.
6. Additional documentation as requested by KCP&L

(J) Contact information

KCP&L and the CONTRACTOR shall provide each other as needed, a list of all Vegetation Management personnel, and the phone numbers where each can be contacted, including pagers/beepers/cell phones.

(K) Communication

During the progress of the work, CONTRACTOR shall provide crew locations to KCP&L staff as requested. In the event the CONTRACTOR plans to deviate from the normal work schedule, e.g. leaving the job site or starting location due to inclement weather or other cause, the foreman shall notify the appropriate personnel immediately.

(L) System Awareness

1. The CONTRACTOR shall at all times be aware of the nature and characteristics of the electric facilities, including circuit voltage. It is understood that all circuits shall remain energized during the performance of work. Any exceptions must be authorized and scheduled by KCP&L. If in the judgment of the Contractor’s general foreman/supervisor, it is hazardous to prune or remove trees with the circuits energized, the Contractor must contact an authorized KCP&L representative. If appropriate KCP&L will provide the necessary protective materials or de-energize circuits to ensure the safe pruning or removal of the tree(s).

2. Should the Contractor knock down or come into contact with conductors (power lines), the Contractor shall immediately notify KCP&L and take the necessary protective measures. All Contractor-caused electric service interruptions are subject to repair at the Contractor's expense. This includes any damage to customers' property, including any electrical damage.
3. In the event a Contractor becomes aware of any broken, damaged, loose or faulty line facilities in the normal course of its line clearance performance, the Contractor shall promptly notify KCP&L as to the exact location(s) and nature of the condition found.
4. The CONTRACTOR's Representative (i.e. Regional Manager or designated representative) and General Foreman shall attend meetings as scheduled by KCP&L to discuss work practices and issues.

(M) Expectations

1. CONTRACTOR shall insure that crew's are being productive at all times.
2. CONTRACTOR shall perform Work as identified by KCP&L. The CONTRACTOR shall only accept work assignments from KCP&L's designated representative. The CONTRACTOR shall make an attempt to contact the homeowner at each property they have planned work.

(8) Definitions

basal treatment - Herbicide application covering the entire stem to approximately 18 inches above the soil

brush - a woody plant that is less than 4 inches DBH, that is not part of an existing tree, and that may reach the conductor at maturity.

brush work – trimming, clearing brush and applying a herbicide to the cut stems, or only applying herbicide to brush.

clearance - the distance between vegetation and the conductors.

coniferous - any of the cone-bearing trees or shrubs, mostly evergreens.

DBH - "diameter at breast height" – the diameter of individual tree trunks or individual stems of brush measured at a point 4.5 feet above the ground.

deciduous - any perennial plant that sheds its leaves annually at the end of a growing season.

demand tree trimming - trimming or removing trees on a customer requested or emergency basis. Also may include tree work associated with line construction projects. This is typically required when trees have grown into the conductors, or are close to the conductors, and have created a potentially dangerous situation. This may also include special trimming or chipping work when requested by the Utility. Customer requested only Utility authorized representatives may assign demand tree work.

directional pruning - a form of natural pruning used to encourage tree regrowth away from the conductor. It is accomplished by removing limbs growing toward the conductors entirely at the branch collar near the trunk of the tree, or by pruning to lateral

branches that are at least one-third the diameter of the limb being cut and are growing away from the conductor.

drop-crotching - is a crown reduction technique in which a tree trimmer makes proper pruning cuts at crotches, removing the larger limb and favoring the smaller. For electric line clearance, the trimmer would remove limbs growing toward the conductors and favor those growing away from the conductors. This usually results in a "V" shaped appearance of the tree crown and is frequently referred to as "V-trimming". See definition of "natural pruning" for further description.

evergreen - any plant that retains its leaves/needles year-round.

foliar herbicide application - the application of a herbicide to the leaves or needles of a target plant.

hazard trees - trees that are located off the right of way, have a high probability for failure and are of sufficient height to contact the conductors and/or structures and guy wires if they were to fall in that direction, and should be cleared. Conditions could include but are not limited to the following: Dead, dying or diseased, leaning trees, weak branches, shallow root system, root failure, internal decay, canker or canker root.

herbicide - a chemical pesticide used to control, suppress, or kill plants.

natural pruning - a method by which branches are cut to the branch collar at a suitable parent limb, the trunk of the tree, or an appropriately sized lateral branch. This method of pruning is sometimes called "drop-crotching", “proper pruning”, the “Shigo method” or "lateral trimming."

preventative maintenance - trimming or removing vegetation on a systematic basis typically by, but not limited to, circuit or grid, and in a manner intended to achieve system reliability.

pruning - the removal of dead, dying, diseased, interfering, objectionable, and/or weak branches of trees or shrubs using proper arboricultural techniques.

removal - completely removing an entire tree as close as practical to ground level and applying herbicide to the cut stump when appropriate.

right-of-way - a transmission or distribution right-of-way, an easement, a utility easement, or any other corridor of land paralleling, on both sides, an overhead transmission or distribution line, and in respect of which the Utility has certain rights.

rounding over - the making of many small cuts so that a tree underneath the conductors is rounded over in a uniform curve. This creates an unhealthy tree condition and results in rapid regrowth directly back toward the electrical conductors. This is not an acceptable practice.

safety zone work – removing all overhang and cutting back limbs to a minimum clearance of 10 feet from the energized conductor.

selective herbicide - a herbicide that, when applied to a mixed population of plants, will control specific species without injury to others.

shearing - the making of many small cuts so that a tree adjacent to the conductors is sheared in a uniform line. This is not a generally acceptable practice.

show-up site – site where CONTRACTOR crews receive work assignments.

side pruning - using natural pruning methods to cut back or removing side branches that are threatening the conductors; required where trees are growing adjacent to conductors.

stump treatment - applying an approved herbicide to the outer ring (cambium) portion of the stump to reduce or eliminate re-growth.

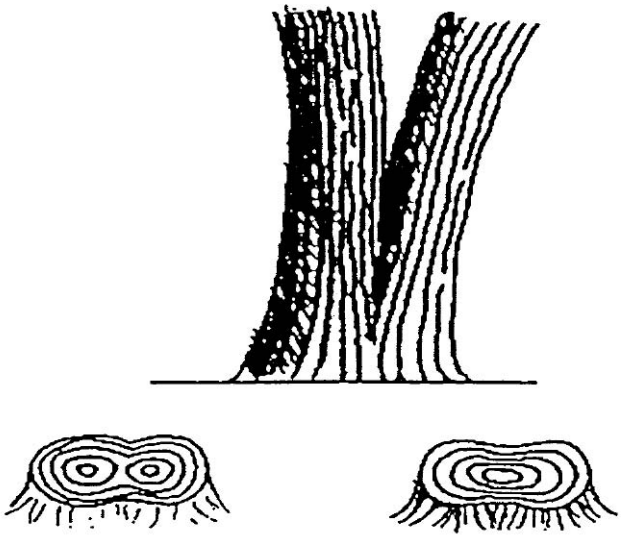
sucker growth - the re-growth within the tree that originates near the cuts made during the previous trimming.

the property - any work site associated with this contract.

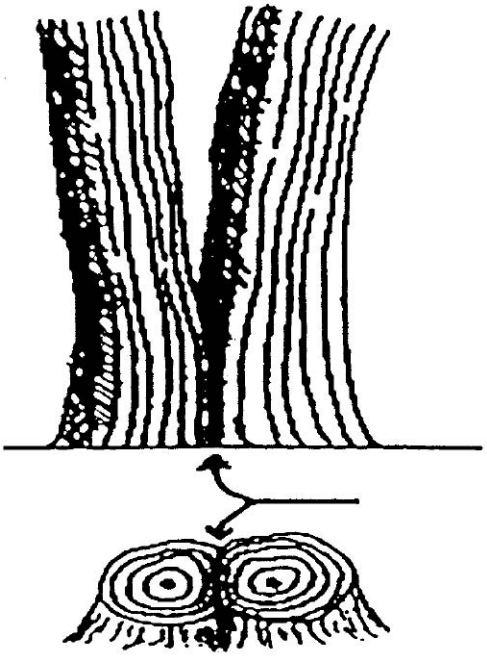
topping - cutting back the upper crown of a tree to a uniform horizontal line, leaving multiple stubs. This is an improper and unacceptable trimming technique.

tree - a perennial plant with a woody trunk measuring at least four (4) inches DBH, and having one set of annual rings at ground level or more than one set of annual rings not separated by included bark. Trees that grow adjacent to one another and share an apparent common base completely separated by "included bark" are considered to be distinct trees. "Included bark" is bark that is included within the wood of a tree, or between the woody stems of separate trees, creating a physical separation between the trees.

single tree- a tree that splits above the ground line and has no visible included bark seam down to the ground line.



multiple trees- Any tree that splits at the ground line or any tree that splits above the ground line but has a visible included bark seam down to the ground line.



tree size classifications - tree diameter as measured at breast height (DBH): 4” to 8”, 8” to 12”, 12” to 24”, 24” and greater

tree crown - the upper portion of the tree; the branches or leaf area.

trimming - cutting back tree branches or shrubs to shape or reduce the size of the tree or shrub.

V-trim - using natural pruning methods to cut back large portions of the upper crown of a tree. This is required when trees are located directly beneath a conductor. Also known as crown reduction pruning or drop crotching.

vegetation - all the plant (flora) life in a particular region. A plant community, assemblage, or aggregation with distinguishable characteristics

(9) Tree Re-growth Rates

Average Annual Re-growth Rates For Individual Species on the KCP&L and GMO Distribution Systems.

Species	Pruning Type	Inches of Re-growth by Age of Sprout					
		1 Yr.	2 Yr.	3 Yr.	4 Yr.	5 Yr.	6 Yr.
Silver Maple	Side	55	67	84	101	118	135
	Top	71	92	113	134	155	176
Hackberry	Side	36	56	78	87	100	104
	Top	53	81	104	120	140	161
Ash	Side	33	63	84	98	115	132
	Top	26	61	88	118	134	161
Honeylocust	Side	36	68	91	115	135	162
	Top	48	81	115	128	147	173
Black Walnut	Side	43	71	87	103	119	130
	Top	69	103	144	166	183	212
Eastern Redcedar	Side	7	11	17	22	27	34
	Top	17	29	41	53	65	79
Osage-Orange	Side	67	89	111	133	155	177
	Top	81	105	129	153	177	201
Mulberry	Side	28	50	75	86	126	141
	Top	52	96	129	163	202	241
Scotch Pine	Side	12	22	29	37	46	54
	Top	13	25	35	44	53	59
Sycamore	Side	71	112	137	158	176	194
	Top	26	96	132	176	225	275
Eastern Cottonwood	Side	48	80	101	128	160	192
	Top	67	105	147	176	196	209
Shingle Oak	Side	43	57	71	87	94	103
	Top	17	36	54	66	77	88

Species	Pruning Type	Inches of Re-growth by Age of Sprout					
		1 Yr.	2 Yr.	3 Yr.	4 Yr.	5 Yr.	6 Yr.
Pin Oak	Side	27	45	57	68	82	91
	Top	30	59	80	94	106	126
Elm	Side	50	83	111	133	152	203
	Top	53	93	124	158	193	226

APPENDIX B – 2010 Distribution Vegetation Management EXPENSE AND PERFORMANCE

Summary

KCP&L manages vegetation for itself and GMO through an Integrated Vegetation Management ("IVM") program. The IVM includes, but is not limited to: manual techniques, mechanical techniques, biological, chemical, and cultural control. Standard crew sizes are three workers on a manual crew and two workers on a bucket crew. Safety hazards may be encountered daily thereby requiring the contractor's certified line clearance trimmer to assess and take proactive measure(s) to safely clear limbs from power lines.

Expenditures – 2010

2010 distribution vegetation management expenditures for Missouri service areas:

KCP&L	$7,412,451
GMO	$6,861,484
Total	$14,274,299

Vegetation Management Activities – 2010

Table 2 summarizes vegetation management activities completed in 2010 on distribution circuits in KCP&L and GMO Missouri service territories.

Table 2: 2010 MO Distribution System Vegetation Management Activities

Company	Circuit	Classification	Miles	Completion Date
KCP&L	479	Urban	2.72	2/13/2010
KCP&L	568	Urban	4.77	3/6/2010
KCP&L	578	Urban	3.13	4/10/2010
KCP&L	579	Urban	3.08	3/6/2010
KCP&L	650	Urban	2.70	3/6/2010
KCP&L	710	Urban	2.30	9/18/2010
KCP&L	711	Urban	0.07	7/17/2010
KCP&L	901	Rural	0.32	4/3/2010
KCP&L	1011	Rural	4.49	1/1/2011
KCP&L	1112	Urban	2.90	3/6/2010
KCP&L	1113	Urban	8.25	4/24/2010
KCP&L	1114	Urban	1.00	2/20/2010
KCP&L	1143	Urban	3.93	3/6/2010
KCP&L	1562	Urban	3.52	2/6/2010
KCP&L	1565	Urban	3.42	1/16/2010

Company	Circuit	Classification	Miles	Completion Date
KCP&L	1576	Urban	2.32	1/9/2010
KCP&L	2341	Urban	5.68	3/20/2010
KCP&L	2343	Urban	12.85	8/21/2010
KCP&L	2352	Urban	8.37	6/19/2010
KCP&L	2354	Urban	9.25	1/1/2011
KCP&L	2372	Urban	6.64	4/3/2010
KCP&L	2391	Urban	0.65	12/4/2010
KCP&L	2412	Urban	4.45	8/21/2010
KCP&L	2413	Urban	3.27	2/27/2010
KCP&L	2414	Urban	2.06	1/1/2011
KCP&L	2422	Urban	2.27	12/25/2010
KCP&L	2433	Urban	0.84	2/13/2010
KCP&L	2441	Urban	2.45	4/24/2010
KCP&L	2454	Urban	0.96	8/14/2010
KCP&L	2521	Rural	75.85	5/29/2010
KCP&L	2605	Urban	5.70	5/29/2010
KCP&L	2712	Urban	3.98	11/20/2010
KCP&L	2743	Urban	0.19	5/8/2010
KCP&L	2807	Urban	11.00	7/10/2010
KCP&L	2811	Rural	17.04	1/1/2011
KCP&L	2812	Rural	20.91	11/6/2010
KCP&L	2821	Rural	19.15	12/11/2010
KCP&L	3011	Urban	3.96	2/13/2010
KCP&L	3012	Urban	8.41	1/1/2011
KCP&L	3209	Urban	1.00	8/28/2010
KCP&L	3212	Rural	18.46	8/28/2010
KCP&L	3299	Urban	9.00	5/29/2010
KCP&L	3512	Urban	6.46	9/18/2010
KCP&L	3514	Rural	1.08	1/16/2010
KCP&L	3531	Urban	5.17	3/27/2010
KCP&L	3543	Urban	7.78	3/27/2010
KCP&L	3551	Urban	5.78	9/18/2010
KCP&L	3711	Urban	2.10	1/1/2011
KCP&L	3714	Urban	2.00	12/11/2010
KCP&L	3732	Urban	1.31	8/7/2010
KCP&L	3931	Urban	8.41	8/7/2010
KCP&L	3932	Urban	0.63	3/6/2010
KCP&L	4313	Rural	16.79	9/18/2010
KCP&L	4413	Urban	2.00	8/28/2010
KCP&L	4811	Urban	8.74	3/27/2010

Company	Circuit	Classification	Miles	Completion Date
KCP&L	4813	Urban	8.34	4/24/2010
KCP&L	4822	Urban	1.82	2/27/2010
KCP&L	4823	Urban	7.72	6/19/2010
KCP&L	4842	Urban	1.03	2/13/2010
KCP&L	4851	Urban	3.88	4/10/2010
KCP&L	4852	Urban	2.76	4/10/2010
KCP&L	4951	Urban	9.29	3/6/2010
KCP&L	4953	Urban	0.06	6/19/2010
KCP&L	5262	Urban	8.69	8/14/2010
KCP&L	5332	Urban	16.74	7/10/2010
KCP&L	5333	Urban	2.59	7/10/2010
KCP&L	5374	Urban	2.62	1/1/2011
KCP&L	5382	Urban	12.57	4/17/2010
KCP&L	5621	Urban	11.16	6/19/2010
KCP&L	5641	Urban	12.07	7/10/2010
KCP&L	5642	Urban	14.75	1/1/2011
KCP&L	5661	Urban	10.52	12/18/2010
KCP&L	5712	Urban	12.42	10/23/2010
KCP&L	5713	Rural	1.60	1/16/2010
KCP&L	5903	Urban	9.00	5/1/2010
KCP&L	5904	Urban	3.00	9/4/2010
KCP&L	5911	Rural	4.00	9/4/2010
KCP&L	5912	Rural	43.51	5/29/2010
KCP&L	6121	Rural	0.41	7/17/2010
KCP&L	6141	Urban	1.72	1/1/2011
KCP&L	6143	Urban	0.02	7/17/2010
KCP&L	6154	Urban	0.37	7/17/2010
KCP&L	6162	Urban	11.23	12/4/2010
KCP&L	6312	Urban	7.63	3/20/2010
KCP&L	6332	Urban	9.45	4/3/2010
KCP&L	6341	Urban	12.45	3/13/2010
KCP&L	6621	Urban	7.61	7/31/2010
KCP&L	6622	Urban	5.34	9/25/2010
KCP&L	6624	Urban	1.89	7/17/2010
KCP&L	6632	Urban	3.79	4/10/2010
KCP&L	6634	Urban	5.82	10/23/2010
KCP&L	7402	Urban	4.85	8/21/2010
KCP&L	7404	Urban	3.90	8/21/2010
KCP&L	7407	Urban	0.39	4/24/2010
KCP&L	7411	Urban	3.06	4/24/2010

Company	Circuit	Classification	Miles	Completion Date
KCP&L	7412	Urban	5.14	12/11/2010
KCP&L	7413	Urban	0.15	7/17/2010
KCP&L	7423	Urban	5.46	7/3/2010
KCP&L	7424	Urban	0.02	7/17/2010
KCP&L	7446	Rural	0.41	6/5/2010
KCP&L	7452	Urban	2.59	6/5/2010
KCP&L	7453	Urban	1.60	1/9/2010
KCP&L	7473	Urban	4.83	1/23/2010
KCP&L	7493	Urban	3.68	12/11/2010
KCP&L	7494	Urban	1.09	7/17/2010
KCP&L	7522	Urban	2.23	7/31/2010
KCP&L	7532	Urban	1.22	8/14/2010
KCP&L	7533	Urban	0.92	12/11/2010
KCP&L	7541	Urban	0.63	7/31/2010
KCP&L	7542	Urban	0.04	2/13/2010
KCP&L	7552	Urban	0.06	9/4/2010
KCP&L	7563	Urban	3.19	12/4/2010
KCP&L	7572	Urban	6.03	12/25/2010
KCP&L	7573	Urban	8.04	12/25/2010
KCP&L	7581	Urban	0.12	10/30/2010
KCP&L	7822	Urban	8.00	6/12/2010
KCP&L	7824	Urban	9.63	10/2/2010
KCP&L	7834	Urban	4.16	6/19/2010
KCP&L	7843	Urban	3.60	6/12/2010
KCP&L	7844	Urban	9.72	6/19/2010
KCP&L	7851	Urban	1.60	1/23/2010
KCP&L	7861	Urban	2.02	6/12/2010
KCP&L	7862	Urban	2.57	4/17/2010
KCP&L	7863	Urban	6.00	2/6/2010
KCP&L	7911	Urban	1.17	1/23/2010
KCP&L	7932	Urban	0.04	7/17/2010
KCP&L	8412	Rural	1.38	9/25/2010
KCP&L	9412	Urban	4.78	6/19/2010
KCP&L	9443	Rural	4.06	8/14/2010
KCP&L	9444	Rural	0.87	7/17/2010
KCP&L	9502	Urban	6.30	5/15/2010
KCP&L	9503	Urban	4.70	5/8/2010
KCP&L	9611	Rural	0.72	9/25/2010
KCP&L	9614	Urban	3.67	10/16/2010
KCP&L	9621	Urban	6.76	10/30/2010

Company	Circuit	Classification	Miles	Completion Date
KCP&L	9623	Urban	1.11	10/30/2010
KCP&L	9841	Urban	16.22	3/13/2010
KCP&L	10012	Rural	9.52	1/23/2010
KCP&L	10431	Rural	68.46	6/19/2010
KCP&L	12212	Rural	7.49	9/18/2010
KCP&L	12702	Urban	3.10	5/29/2010
KCP&L	12703	Urban	5.10	5/29/2010
KCP&L	28521	Rural	9.44	12/4/2010
KCP&L	33323	Urban	6.80	11/6/2010
MPS	560	Urban	3.85	9/4/2010
MPS	610	Urban	15.02	4/3/2010
MPS	910	Urban	44.66	12/4/2010
MPS	1011	Rural	2.69	1/1/2011
MPS	11824	Urban	6.39	9/4/2010
MPS	11832	Urban	26.45	10/30/2010
MPS	21111	Rural	14.82	4/17/2010
MPS	21112	Rural	20.01	4/17/2010
MPS	21321	Urban	12.29	7/17/2010
MPS	21422	Urban	1.58	3/6/2010
MPS	21431	Urban	15.23	5/8/2010
MPS	21432	Urban	1.04	2/20/2010
MPS	21433	Urban	3.24	2/27/2010
MPS	21511	Urban	4.97	5/8/2010
MPS	21512	Urban	4.42	5/8/2010
MPS	21514	Urban	7.72	5/15/2010
MPS	22111	Urban	8.38	7/24/2010
MPS	22112	Urban	25.07	8/28/2010
MPS	22113	Urban	17.02	7/24/2010
MPS	22311	Rural	53.84	10/9/2010
MPS	22312	Urban	16.63	8/21/2010
MPS	22313	Urban	14.12	8/28/2010
MPS	22601	Urban	14.10	12/18/2010
MPS	22711	Urban	3.15	4/3/2010
MPS	22712	Urban	3.36	4/3/2010
MPS	22713	Urban	1.47	2/13/2010
MPS	22811	Rural	23.44	2/27/2010
MPS	22812	Rural	9.71	2/27/2010
MPS	24011	Urban	26.84	1/1/2011
MPS	24012	Urban	29.16	1/1/2011
MPS	24021	Urban	14.12	1/1/2011

Company	Circuit	Classification	Miles	Completion Date
MPS	24814	Urban	3.62	1/23/2010
MPS	25212	Rural	22.68	9/4/2010
MPS	25911	Rural	4.04	2/13/2010
MPS	25912	Rural	1.94	1/30/2010
MPS	25913	Rural	3.33	1/30/2010
MPS	26611	Rural	2.89	5/8/2010
MPS	26711	Rural	13.70	5/1/2010
MPS	26712	Rural	72.06	5/1/2010
MPS	27012	Urban	0.51	12/11/2010
MPS	27711	Urban	13.49	4/3/2010
MPS	27721	Urban	23.72	8/7/2010
MPS	27821	Rural	4.06	6/26/2010
MPS	28232	Urban	0.38	10/9/2010
MPS	28521	Rural	50.95	12/4/2010
MPS	29012	Urban	9.17	1/1/2011
MPS	29032	Urban	40.74	11/27/2010
MPS	29112	Urban	16.80	11/13/2010
MPS	29113	Urban	21.19	9/25/2010
MPS	29122	Urban	6.99	8/28/2010
MPS	29123	Urban	17.64	12/4/2010
MPS	30312	Rural	4.09	4/3/2010
MPS	30313	Rural	20.29	4/10/2010
MPS	31112	Urban	20.95	10/30/2010
MPS	31113	Rural	2.69	7/3/2010
MPS	31312	Rural	28.65	7/24/2010
MPS	31911	Rural	55.01	8/14/2010
MPS	32513	Urban	9.92	11/27/2010
MPS	32611	Urban	4.99	7/31/2010
MPS	32653	Urban	22.21	9/4/2010
MPS	33111	Urban	3.80	10/23/2010
MPS	33211	Rural	5.73	6/5/2010
MPS	33212	Rural	0.29	5/8/2010
MPS	33323	Urban	17.40	11/6/2010
MPS	33811	Rural	2.65	4/17/2010
MPS	33812	Urban	2.00	5/1/2010
MPS	34712	Urban	6.70	12/25/2010
MPS	34713	Urban	15.30	1/1/2011
MPS	36611	Urban	4.50	1/23/2010
MPS	37221	Urban	4.60	10/16/2010
MPS	37231	Urban	28.12	12/4/2010

Company	Circuit	Classification	Miles	Completion Date
MPS	37232	Urban	8.10	12/4/2010
MPS	37323	Urban	7.26	2/6/2010
MPS	37612	Urban	3.86	1/1/2011
MPS	38313	Urban	17.02	10/30/2010
MPS	38823	Urban	1.20	12/18/2010
MPS	38911	Rural	1.20	1/1/2011
MPS	40781	Rural	3.81	10/23/2010
MPS	40782	Rural	3.70	11/6/2010
MPS	41311	Rural	15.27	10/30/2010
MPS	42411	Rural	21.11	10/16/2010
MPS	42731	Rural	1.80	1/1/2011
MPS	43031	Urban	3.50	10/23/2010
MPS	43312	Urban	2.60	1/1/2011
MPS	399207	Urban	0.40	1/1/2011
MPS	590/640	Urban	27.40	4/17/2010
SJLP	38211	Rural	2.30	1/9/2010
SJLP	38221	Urban	6.28	1/23/2010
SJLP	38231	Urban	17.97	1/23/2010
SJLP	38241	Urban	5.81	1/23/2010
SJLP	38311	Rural	46.73	6/26/2010
SJLP	38516	Urban	4.01	9/25/2010
SJLP	38821	Urban	18.60	6/19/2010
SJLP	38822	Urban	23.00	8/21/2010
SJLP	38823	Urban	10.90	12/18/2010
SJLP	38833	Urban	9.15	2/13/2010
SJLP	38911	Rural	4.30	1/1/2011
SJLP	39043	Urban	4.67	2/20/2010
SJLP	39412	Urban	21.35	8/28/2010
SJLP	39431	Urban	9.09	9/18/2010
SJLP	39441	Urban	8.31	8/21/2010
SJLP	39611	Rural	16.68	5/8/2010
SJLP	40211	Urban	7.75	9/4/2010
SJLP	40212	Urban	5.06	9/18/2010
SJLP	40756	Urban	16.47	2/20/2010
SJLP	40781	Rural	12.66	10/23/2010
SJLP	40782	Rural	8.61	11/6/2010
SJLP	41311	Rural	36.21	10/30/2010
SJLP	41321	Rural	28.59	5/15/2010
SJLP	41511	Urban	10.24	12/11/2010
SJLP	41631	Urban	11.60	3/27/2010

Company	Circuit	Classification	Miles	Completion Date
SJLP	41641	Urban	10.31	6/26/2010
SJLP	42411	Rural	3.60	10/16/2010
SJLP	42731	Rural	13.69	1/1/2011
SJLP	43031	Urban	4.57	10/23/2010
SJLP	399207	Urban	1.00	1/1/2011
SJLP	399208	Urban	12.24	11/20/2010
Total 2010 Miles			**2,452.63**	

Table 3: 2010 Missouri Completion Summary

Territory	Urban Miles	Rural Miles	Total 12 kV (Urban + Rural)	34 kV	Total 12 kV + 34 kV
KCP&L-Missouri	521.91	325.96	851.79	60.20	911.99
GMO	786.07	639.82	1,421.97	118.67	1540.64
Total	1,307.98	965.78	2,273.76	178.87	2,452.63

Note: Minor differences in distribution system miles occur between annual and quarterly reports. The minor differences reflect regular monitoring of the distribution system that identifies retired or new facilities.

APPENDIX C – 2011 DISTRIBUTION VEGETATION MANAGEMENT BUDGET AND SCHEDULED PERFORMANCE

The listed vegetation management work is planned for completion in 2011. The Program is dynamic in nature and, at times, requires adjustment to conform to performance as measured by tree-related service reliability; to take advantage of opportunities to gain efficiency; to incorporate customer feedback; to address changes in regulatory initiatives; and to address other program drivers. In light of the many variables affecting vegetation management activities, including weather, specific completion dates were excluded from this appendix.

Budget – 2011

2011 distribution vegetation management budget for Missouri service areas:

KCP&L	$11,684,316
GMO	$10,157,909
	$21,842,226

Table 4: 2011 MO Distribution System Vegetation Management Circuits Scheduled for Maintenance

Company	Circuit	Classification	Miles
KCP&L	18	Rural	0.28
KCP&L	116	Rural	0.50
KCP&L	120	Rural	0.36
KCP&L	647	Urban	0.70
KCP&L	1011	Rural	9.68
KCP&L	1012	Rural	14.39
KCP&L	1013	Rural	0.71
KCP&L	1113	Urban	6.28
KCP&L	1144	Urban	1.90
KCP&L	1521	Urban	0.16
KCP&L	1811	Rural	44.74
KCP&L	1812	Rural	65.18
KCP&L	1813	Rural	43.75
KCP&L	2301	Urban	8.76
KCP&L	2303	Urban	5.56
KCP&L	2332	Urban	7.74
KCP&L	2391	Urban	13.23
KCP&L	2393	Urban	8.10
KCP&L	2444	Urban	3.94
KCP&L	2461	Urban	1.99
KCP&L	2481	Urban	0.58

Company	Circuit	Classification	Miles
KCP&L	2713	Urban	1.86
KCP&L	2722	Urban	11.59
KCP&L	2733	Urban	8.43
KCP&L	2734	Urban	3.26
KCP&L	2742	Urban	2.83
KCP&L	2751	Rural	3.39
KCP&L	2753	Rural	4.29
KCP&L	2762	Urban	3.40
KCP&L	2811	Rural	55.06
KCP&L	2822	Urban	1.22
KCP&L	3111	Urban	4.60
KCP&L	3114	Urban	9.50
KCP&L	3131	Urban	4.02
KCP&L	3134	Urban	12.39
KCP&L	3143	Urban	7.93
KCP&L	3411	Rural	3.98
KCP&L	3412	Rural	35.91
KCP&L	3612	Rural	56.84
KCP&L	3721	Urban	3.49
KCP&L	3722	Urban	4.66
KCP&L	3723	Urban	2.08
KCP&L	3733	Urban	2.80
KCP&L	3734	Urban	0.04
KCP&L	3911	Rural	2.28
KCP&L	3913	Urban	2.39
KCP&L	3941	Urban	4.25
KCP&L	4222	Rural	4.11
KCP&L	4412	Urban	1.48
KCP&L	4414	Urban	4.27
KCP&L	4812	Urban	2.25
KCP&L	4853	Urban	5.75
KCP&L	4913	Urban	9.52
KCP&L	4941	Urban	5.15
KCP&L	4942	Urban	7.76
KCP&L	5251	Urban	12.25
KCP&L	5252	Urban	8.36
KCP&L	5338	Urban	4.57
KCP&L	5372	Urban	7.63
KCP&L	5374	Urban	14.43
KCP&L	5381	Urban	7.88
KCP&L	5382	Urban	4.26

Company	Circuit	Classification	Miles
KCP&L	5384	Rural	13.09
KCP&L	5624	Urban	7.57
KCP&L	5644	Urban	14.93
KCP&L	5663	Urban	17.88
KCP&L	5911	Rural	60.43
KCP&L	6131	Urban	16.58
KCP&L	6312	Urban	3.98
KCP&L	6331	Urban	18.63
KCP&L	6333	Urban	3.68
KCP&L	6342	Urban	9.44
KCP&L	6614	Urban	5.09
KCP&L	6623	Urban	27.81
KCP&L	6631	Urban	2.15
KCP&L	7041	Urban	5.40
KCP&L	7111	Rural	2.51
KCP&L	7142	Urban	2.74
KCP&L	7411	Urban	3.49
KCP&L	7482	Urban	2.84
KCP&L	7512	Urban	0.09
KCP&L	7514	Urban	3.55
KCP&L	7534	Urban	15.16
KCP&L	7543	Urban	1.22
KCP&L	7553	Urban	3.53
KCP&L	7562	Urban	1.56
KCP&L	7574	Urban	2.65
KCP&L	7823	Urban	14.89
KCP&L	7853	Urban	4.55
KCP&L	7862	Urban	3.46
KCP&L	7911	Urban	7.02
KCP&L	8311	Urban	14.25
KCP&L	8313	Urban	6.94
KCP&L	8324	Urban	0.76
KCP&L	9413	Rural	1.06
KCP&L	9421	Urban	1.98
KCP&L	9422	Urban	3.05
KCP&L	9423	Rural	1.13
KCP&L	9612	Urban	2.64
KCP&L	9813	Urban	15.10
KCP&L	9842	Rural	4.37
KCP&L	10011	Rural	1.85
KCP&L	11011	Rural	0.16

Company	Circuit	Classification	Miles
KCP&L	11611	Rural	154.95
KCP&L	11612	Rural	32.54
KCP&L	12013	Rural	13.80
KCP&L	12211	Urban	14.67
MPS	11822	Urban	4.08
MPS	11823	Urban	7.27
MPS	11831	Urban	3.26
MPS	20407	Urban	18.87
MPS	21211	Urban	1.01
MPS	21212	Urban	0.31
MPS	21412	Urban	3.51
MPS	21421	Urban	7.63
MPS	21711	Rural	15.75
MPS	22511	Urban	7.42
MPS	22512	Urban	11.35
MPS	23211	Rural	8.78
MPS	23212	Urban	6.56
MPS	24013	Urban	16.38
MPS	24023	Urban	18.50
MPS	24513	Urban	8.23
MPS	24611	Urban	22.89
MPS	24613	Urban	9.77
MPS	24712	Urban	13.03
MPS	24713	Rural	14.25
MPS	24721	Rural	2.53
MPS	24722	Urban	6.33
MPS	24811	Urban	3.12
MPS	24812	Urban	4.21
MPS	24813	Urban	5.27
MPS	24815	Urban	4.74
MPS	25322	Rural	1.45
MPS	25323	Urban	19.26
MPS	27011	Rural	0.59
MPS	27023	Rural	0.26
MPS	27611	Rural	0.06
MPS	27612	Rural	0.72
MPS	28522	Rural	47.00
MPS	29211	Urban	7.92
MPS	29312	Urban	10.81
MPS	30612	Urban	22.50
MPS	30721	Urban	1.13

Company	Circuit	Classification	Miles
MPS	30722	Urban	12.02
MPS	31111	Urban	33.58
MPS	31121	Urban	2.50
MPS	31611	Urban	27.01
MPS	32111	Rural	26.93
MPS	32131	Urban	7.86
MPS	32132	Urban	41.21
MPS	32522	Urban	8.93
MPS	32523	Urban	49.33
MPS	32612	Rural	127.82
MPS	32722	Urban	21.75
MPS	32812	Urban	10.52
MPS	33113	Rural	5.28
MPS	33115	Rural	2.80
MPS	33411	Urban	3.14
MPS	34011	Rural	11.48
MPS	34211	Urban	6.33
MPS	34212	Urban	32.02
MPS	34213	Urban	0.47
MPS	34311	Urban	0.99
MPS	34312	Urban	0.92
MPS	34411	Rural	0.29
MPS	34511	Urban	2.35
MPS	34512	Urban	0.01
MPS	34711	Urban	0.01
MPS	34713	Urban	25.04
MPS	34811	Urban	4.64
MPS	34812	Urban	2.52
MPS	35811	Rural	11.67
MPS	35912	Urban	22.93
MPS	37211	Urban	1.03
MPS	37213	Urban	1.50
MPS	37222	Urban	6.92
MPS	37311	Urban	15.01
MPS	37612	Urban	6.03
MPS	37613	Urban	11.73
MPS	37622	Urban	12.46
MPS	37631	Urban	15.39
MPS	37632	Urban	7.29
MPS	37643	Urban	10.49
MPS	38111	Urban	23.28

Company	Circuit	Classification	Miles
SJLP	38312	Urban	12.52
SJLP	38314	Urban	16.22
SJLP	38315	Rural	28.15
SJLP	38511	Urban	1.96
SJLP	38611	Rural	42.55
SJLP	38911	Rural	8.28
SJLP	39172	Urban	4.77
SJLP	39173	Urban	15.65
SJLP	39411	Urban	8.13
SJLP	39815	Rural	1.20
SJLP	39816	Rural	2.55
SJLP	40121	Rural	60.15
SJLP	40122	Rural	23.39
SJLP	41521	Rural	29.01
SJLP	42511	Rural	2.89
SJLP	42521	Rural	1.86
SJLP	42612	Rural	45.56
SJLP	42721	Urban	19.04
SJLP	43022	Rural	4.41
SJLP	43311	Urban	3.42
SJLP	386207	Urban	9.73
SJLP	386208	Urban	8.41
SJLP	390105	Urban	35.74
SJLP	390107	Urban	8.51
SJLP	390208	Urban	3.26
SJLP	390210	Urban	8.87
SJLP	391104	Urban	0.63
SJLP	399109	Urban	7.56
SJLP	401111	Urban	19.59
SJLP	404111	Urban	0.01
SJLP	404112	Urban	5.26
SJLP	404117	Urban	24.99
SJLP	404131	Urban	0.01
SJLP	404201	Urban	3.70
Total 2011 Miles			**2,554.07**

Table 5: 2011 Summary MO Distribution System Vegetation Management Circuits Scheduled for Maintenance

Territory	Urban Miles	Rural Miles	Total 12 kV (Urban + Rural)	34 kV	12 kV + 34 kV
KCP&L-Missouri	482.57	631.34	1113.91	21.95	1,135.86
GMO	735.40	527.67	1,263.07	155.14	1,418.21
Total	1,217.97	1,159.01	2,376.98	177.09	2,554.07

Table 6: Missouri Distribution System Miles

Territory	Urban Miles	Rural Miles	Total 12 kV (Urban + Rural)	34 kV	12 kV + 34 kV
KCP&L-Missouri	1,989.75	1,860.63	3,850.38	158.75	4,009.13
GMO	2,593.82	5,102.95	7,696.77	453.20	8,149.97
Total	4,583.57	6,963.58	11,547.15	611.95	12,159.10

APPENDICES D THROUGH H

HIGHLY CONFIDENTIAL

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