

In the Matter of an Investigation of)
Aquila Inc.'s Storm Preparation and) Case No. EO-2008-0220
Restoration Efforts)

practices, procedures and recommendations determined to be applicable and beneficial to future utility operations.

A review and evaluation of Ameren, Empire and KCP&L's storm reports was completed by September 1, 2008. Central to the themes' of the reports is the importance of communication with stakeholders. Consequently, KCP&L-GMO reevaluated its communications plan and is pursuing two initiatives to improve communications: 1) Developing and presenting a consistent, accurate message on storm restoration through the use of a standardized storm restoration report, and 2) Improve KCP&L-GMO's collaboration with the State Emergency Management Agency ("SEMA") and their Emergency Operations Center ("EOC.")

To improve communication to stakeholders, Ameren's consultant, KEMA, recommends affected companies' EOCs prepare a short and consistently formatted dashboard-style report containing: customer outage statistics; the allocation of in-house, contract, and mutual aid restoration resources; and, known estimated restoration times by geographic area (See page 10-4, Attachment C "Emergency Restoration – Execution", KEMA report dated November 2007).

The Superintendent of Emergency Response has been tasked with developing the format of the dashboard report, collecting information during an event, and making the report available to stakeholders. A sample draft of the report and a description of its distribution channels will be available by January 31, 2009.

In an effort to improve collaboration with SEMA and the state's EOC, and local EOCs, the Company initiated contact with local EOCs in the communities it serves. The Superintendent of Emergency Response attends monthly meetings with numerous groups representing local EOCs. The Superintendent of Emergency Response also contacted SEMA in April 2008 to request to be included in teleconferences, meetings and relevant SEMA activities. Company representatives are now contacted when SEMA activates their EOC.

Recommendation 3: Participate in a Missouri Public Service Commission (“Commission”) sponsored storm restoration workshop to discuss this report and concurrent reports for other utilities. Incorporate an agenda item for the workshop to include consistent methodology for future utility storm reporting.

The Superintendent of Emergency Response contacted Ameren and Westar concerning storm restoration practices. A meeting was held in Kansas City with Ameren and Westar in September 2008. The meeting included discussion on how companies can help each other during an emergency. The focus of the meeting was storm restoration. In October 2008, Ameren hosted a second meeting in St. Louis, Missouri. Westar will be hosting a future meeting in Wichita, Kansas.

Recommendation 4: Review the maximum call allowed value (“MCA”) on all toll-free numbers at the on-set of future outages and periodically throughout outages to minimize the occurrence of blocked calls. Adjust MCA values to appropriate levels to allow the maximum level of calls to the Call Center that can effectively be handled.

This practice was discontinued on July 14, 2008 with the integration of KCP&L and KCP&L-GMO's call center operations.

Recommendation 5: Incorporate MCA reviews and adjustment steps in the Company's ESRP as an actionable item to review during outages.

This practice was discontinued on July 14, 2008 with the integration of KCP&L and KCP&L-GMO's call center operations.

Recommendation 6: Review opportunities to improve the callback system during system outages by utilizing customer secondary phone numbers. If determined operationally feasible and cost-effective to use secondary phone numbers in the callback process, verify that the Company consistently obtains secondary customer phone numbers during its contacts with customers, such as through the Call Center at the time of service application or other contact opportunities.

A project is currently underway in which IT is assisting the Customer Services' department in mapping across multiple customer phone numbers already in place with CIS+. This will allow the IVR and automated outage reporting tools better ability to authenticate the caller thereby allowing additional self-serve options. This will provide a faster, more accurate customer interaction and response. This project is expected to be complete by November 30, 2008.

Recommendation 7: Review Call Center outage scripts to determine if opportunities for improvement may exist in providing customers specific instructions after service has been restored, such as turning their porch light on, or other beneficial information they may receive in a return call from the utility.

KCP&L-GMO's online reference tool, Compass, is updated daily during emergency/outage situations or as business needs dictate.

Recommendation 8: Enable Call Center Associates to have access to the call-back system data to determine which customers have been identified as having had their service restored.

KCP&L-GMO's outbound calling vendor is 21st Century Communications ("TFCC"). TFCC provides an outbound calling capacity that well exceeds the potential demand by KCP&L-GMO. Therefore, the outbound calling response to outages has capacity to expand. KCP&L-GMO continues to evaluate what information to convey to customers in this situation. The current process calls for the CCC inputting data into the Operations Management System ("OMS") and then TFCC processes the input. This process is being reviewed with a goal of streamlining the entire process.

Recommendation 9: Review and evaluate the Company's Website for improvements including improved correspondence of city and town populations to outage data to allow that portion of the Website to be operational and available to customers during system outages.

Changes to KCP&L-GMO's Website were completed in May 2008 to provide additional outage information. On July 14, 2008, KCP&L-GMO's customer outage information was added to KCP&L's data on the PowerWatch map. All customer outages of KCP&L and KCP&L-GMO appear on the PowerWatch map. This system is maintained by the Outage Management Group in Information Technology.

Recommendation 10: Review the public comments filed by its customers in the Commission's Electronic Filing and Information System ("EFIS") continuously to determine areas of customer concern, service quality improvements and areas of success.

KCP&L's Superintendent of Emergency Response will oversee the review of public comments in the Commission's EFIS during a major event. All comments will be investigated and a Company representative will follow-up with the customer.

Recommendation 11: Determine proactive methods to maintain current information on nursing homes and residential care facilities that may be opening and closing in its service territories.

KCP&L-GMO maintains a database of assistance agencies, churches, seniors' organizations, Red Cross, and other agencies in the KCP&L-GMO service territory. The data is updated as organizations' personnel or services change. Customer Relations' continues to update information as the Company is made aware of new organizations or the closure of existing organizations.

Recommendation 12: Review its procedures for commitments and communication to assist local governments, including commitments to start generators for critical services such as sewage treatment. Coordinate responses and commitments effectively at the Company so that commitments are fulfilled. If commitments cannot be fulfilled, provide restoration status reports to governmental bodies on a timely basis.

KCP&L-GMO is committed to working with communities, providing relevant and timely updates, and when possible, any assistance they may require. While KCP&L-GMO does not maintain a supply of generators, the Company is working on identifying sources, such as the National Guard. This effort is targeted for completion by January 31, 2009. The Company is also working on

identifying generator tie points on the system to be used in the event of a major outage.

Recommendation 13: Provide city and county officials with current secondary phone numbers and key storm-related personnel changes as a means to access appropriate utility personnel during system outages or during other critical events. Review such phone numbers and personnel changes periodically, such as every six months, with governmental officials to make sure they are current, especially after periods of personnel changes.

KCP&L-GMO city and county officials received a letter in August 2008 that contained Distribution Systems Operation direct contact numbers for Fire and Police personnel. Additionally, the Superintendent of Emergency Response has met with numerous city and county officials in the KCP&L-GMO service territory. Government Affairs' personnel works closely with the Superintendent of Emergency Response, keeping contact information up to date and notification of any meetings each other may want to participate in. This is an on-going effort.

Recommendation 14: Evaluate future opportunities to use on-site KCP&L-GMO personnel at Emergency Operation Centers in communities where outages are most severe. Review such opportunities with county and city governmental personnel.

The Superintendent of Emergency Response meets periodically with city and county officials. In a few of the meetings, availability of a Company representative in on-site EOCs has been discussed. For the larger EOCs, Government Affairs' personnel have been identified. The Superintendent of Emergency Response will meet with Government Affairs to discuss available

personnel and assignments. The target date for completion is December 31, 2008.

Recommendation 15: Include the Commission Manager of Consumer Services regularly on service outage update communication and restoration progress.

The Company has identified two principal contacts for communicating with the Commission's Manager of Consumer Services during a major event. At least one of them will be in contact with the Commission as often as required and available to the Commission during the pendency of the event. The contacts will have access to key "command and control" personnel and the EOC operation. Contact information was provided to the Commission.

Recommendation 16: Review its February 29, 2008 report and address the areas of improvement identified in a timely manner but no later than the next winter period.

There are twenty-five items listed on pages 45 and 46 in the February 29, 2008 report filed with the Commission. All reports and reviews from the December 2007 storm were reviewed by November 15, 2008. The items include system enhancements, communication issues, process flows, system functionality and information flow. KCP&L-GMO has made numerous changes after the acquisition by Great Plains Energy that address most of these issues. KCP&L-GMO's use of KCP&L's Outage Management System, Outage Reporting System, CIS+ and SERP corrected these deficiencies.

One item remains unresolved—working with critical load customers, such as water/sewer treatment plants, on the benefits of installing backup generation and providing a list of accessible generators for the cities.

The Company is working on contacting vendors and the Missouri National Guard to determine the availability of backup generators in the event of an outage event. The initial list of available equipment will be completed by January 31, 2008.

The Company is also identifying the points on KCP&L-GMO's system that can tie into a backup generator in the event system damage interrupts delivery of electricity.

Recommendation 17: Revise vegetation management procedures to incorporate the Commission's Electrical Corporation Vegetation Management Standards and Reporting Requirements, 4 CSR 240-23.030, which became effective on June 30, 2008.

KCP&L-GMO filed its Vegetation Management Compliance Plan with the Commission on July 5, 2008. KCP&L-GMO's plan addresses and incorporates the changes required under the vegetation management rule. KCP&L-GMO has been following this plan since it was filed in July.

Recommendation 18: Revise operation standards to incorporate the Commission's Electrical Corporation Infrastructure Standards, 4 CSR 240-23.020, which became effective on June 30, 2008.

KCP&L-GMO filed its Infrastructure Standards Compliance Plan with the Commission on July 5, 2008. KCP&L-GMO's plan addresses and incorporates the changes required under the infrastructure standards rule.

Respectfully submitted,

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Company**

Dated: November 10, 2008

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand delivered, emailed or mailed, postage prepaid, this 10th day of November, 2008, to all counsel of record.

/s/ *Curtis D. Blanc*

Curtis D. Blanc