BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of an Investigation of)Kansas City Power & Light Company's)Storm Preparation and Restoration Efforts)

Case No. EO-2008-0219

STAFF'S SUPPLEMENTAL REPORT

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and submits this Supplemental Report evaluating Kansas City Power & Light Company's (KCP&L or Company) November 10, 2008 Status Update to Staff Recommendations Regarding Storm Preparation and Restoration Efforts. For its Supplemental Report, the Staff respectfully states to the Missouri Public Service Commission (Commission) as follows:

- On January 2, 2008, the Commission issued an order directing Staff to investigate KCP&L's response to the December 2007 ice storm experienced in its service territory. On April 3, 2008, Staff filed an initial report of its investigation with the Commission, followed by a final report submitted on June 17, 2008.
- Staff's June 17, 2008 Final Report contained twenty-four (24) recommendations on how KCP&L could improve its response in future storms. KCP&L filed a response to Staff's recommendations on August 15, 2008.
- 3. On September 9, 2008, the Commission issued an order directing "KCPL to provide Staff with additional information regarding its progress in complying with Staff's recommendations." The Commission further ordered Staff to file a brief supplemental report evaluating the Company's compliance with Staff's recommendations.
- 4. Attached hereto is Staff's Memorandum, completed by Michael Taylor, Utility Engineering Specialist, and Kay Niemeier, Utility Management Analyst.

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- Staff's Memorandum contains specific discussion on certain recommendations, along with the overall conclusion that KCP&L has achieved compliance with Staff's June 17, 2008 recommendations, or is taking appropriate action to do so.
- 6. Staff will continue to monitor KCP&L's actions toward completion of Staff's recommendations.

WHEREFORE, the Staff submits its Supplemental Report to the Missouri Public Service Commission.

Respectfully submitted,

<u>/s/ Jennifer Hernandez</u>

Jennifer Hernandez Legal Counsel Missouri Bar No. 59814

Attorney for Staff of the Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102 (573) 751-8706 (Telephone) (573)-751-9285 (Fax) jennifer.hernandez@psc.mo.gov

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing was served via U.S. Mail,

electronic mail, or facsimile upon all counsel of record this 9th day of January, 2009.

/s/ Jennifer Hernandez

Memorandum

TO:	Missouri Public Service Commission Official Case File Case No. EO-2008-0219 Investigation of Kansas City Power and Light Company's Storm Preparation and Restoration Efforts			
FROM:	Michael E. Taylor, Energy Department – Engineering Analysis Kay Niemeier, Engineering and Management Services			
	<u>/s/ Lena Mantle 1/9/09</u> Energy Department / Date	/s/ Jennifer Hernandez 1/9/09 General Counsel's Office / Date		
Subject:	Staff Supplemental Report			
Date:	January 9, 2009			

The Staff of the Missouri Public Service Commission (Staff) has evaluated Kansas City Power and Light Company's (KCP&L's) Status Update to Staff Recommendations Regarding Storm Preparation and Restoration Efforts. The status update was submitted on November 10, 2008 to comply with a Commission Order issued September 9, 2008. The Order also required a Supplemental Report from Staff.

The Final Report of Staff's Investigation included twenty-four (24) recommendations, some recommendations contained multiple parts. Based on Staff's evaluation of KCP&L's compliance with the recommendations contained in the report, the following determinations resulted.

- 1. KCP&L has agreed with the substance of all the recommendations and has initiated or completed action to implement appropriate changes to their procedures, processes, and policies.
- 2. Based on KCP&L's status update submitted on November 10, 2008 and additional Staff discussions with KCP&L personnel, approximately 80% of the actions are completed or scheduled for completion by January 31, 2009.
- 3. The remaining actions are scheduled for completion in the first half of 2009 or will be completed at a time to be determined (these items include such actions as participation in a storm restoration workshop).
- 4. The scheduled completion dates for all pending items appear reasonable.

Staff determined that, from an overall perspective, KCP&L has achieved compliance with Staff's recommendations or is taking appropriate action to do so.

Staff will continue to monitor progress of completion of the KCP&L actions. The recent transition of Aquila, Inc. to KCP&L Greater Missouri Operations Company (GMOC) will

MO PSC Official Case File Case No. EO-2008-0219 Page 2 of 2 require integration of KCP&L's corrective actions with GMOC, where appropriate. The completion and effectiveness of that integration will also be monitored by Staff.

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OF THE STATE OF MISSOURI

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In the Matter of an Investigation of Kansas City Power & Light Company's Storm Preparation and Restoration Efforts

Case No. EO-2008-0219

AFFIDAVIT OF MICHAEL E. TAYLOR

STATE OF MISSOURI)	
)	SS.
COUNTY OF COLE)	

Michael E. Taylor, of lawful age, on his oath states: that he has participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was developed by him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true and correct to the best of his knowledge and belief.

Michael E. Taylor

Subscribed and sworn to before me this $\frac{g^{4}}{2}$ day of $\frac{1}{2}$, 2009.

SUSAN L. SUNDERMEYER My Commission Expires September 21, 2010 Callaway County Commission #06942086

Lusar Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

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In the Matter of an Investigation of Kansas City Power & Light Company's Storm Preparation and Restoration Efforts

Case No. EO-2008-0219

AFFIDAVIT OF J. KAY NIEMEIER

STATE OF MISSOURI)	
)	SS.
COUNTY OF COLE)	

J. Kay Niemeier, of lawful age, on her oath states: that she has participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was developed by her; that she has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true and correct to the best of her knowledge and belief.

Kay Memeier J (Kay Niemeier

Subscribed and sworn to before me this	8-th	day of	<u>uary</u> , 2009.
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D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: December 08, 2012 Commission Number: 08412071

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