

In the Matter of an Investigation of)
 Kansas City Power & Light Company's) Case No. EO-2008-0219
 Storm Preparation and Restoration Efforts)

COMES NOW Kansas City Power and Light Company (“KCPL” or the “Company”)

KCPL appreciates the opportunity to review, consider and respond to Staff's June 17, 2008 report. Most importantly, it is KCPL's desire to continue to improve its storm and catastrophic event response and welcomes the opportunity to work with Staff to make those improvements. As part of that cooperative effort, we offer the following update and response to Staff's recommendations:

Recommendation 1: KCPL should review recent storm reports and evaluations completed for other Missouri utilities (including the reports filed concurrent with this report). Any items noted in those reports that would be applicable to KCPL should be considered for implementation.

A review of Ameren, Empire and Aquila's storm reports and evaluations in the referenced matter is currently underway and will be completed by September 1, 2008. KCPL will evaluate and implement items identified as best practices and applicable to KCPL's storm response procedures and systems.

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data. It is understood that some circuits cross state boundaries and this may be difficult to accomplish 100% of the time. Additionally, KCPL should verify consistency of PowerWatch Website statistics with other internal company databases.

KCPL is currently working on developing a feature to provide a “state view” of outages. The PowerWatch Web site statistics are extracted from the databases used by the Outage Reporting System (“ORS”), which is connected to the Outage Management System (“OMS”). The ORS databases contain the best available data for populating the PowerWatch statistics.

Recommendation 3: KCPL should evaluate their communications with state government agencies during significant customer interruption events. Those agencies would include: the Missouri Public Service Commission (“Commission”); the State Emergency Management Agency (“SEMA”); the Department of Health and Senior Services; the Department of Social Services; and Department of Transportation. This communication could be coordinated through State Emergency Management Agency teleconferences when the State Emergency Operations Center is activated.

KCPL continues to evaluate and seeks feedback as to how it can best communicate with the Commission’s Staff, emergency management agencies and its governmental stakeholders during a storm event. KCPL has arranged with SEMA to participate on SEMA teleconferences when the operations center is activated and the event affects KCPL service territories.

Recommendation 4: KCPL, the other investor-owned Missouri electric utilities, and Staff should plan and schedule a storm restoration workshop to discuss this report and the

concurrent reports for the other utilities. One agenda item for that workshop should be discussion of a consistent methodology for development of future storm reports.

KCPL supports this recommendation and is willing to host the first workshop.

We believe there would be great benefit in holding annual meetings regarding storm response with Staff and the other investor-owned Missouri electric utilities.

Recommendation 5: Continue or begin working on self-identified improvement opportunities such as:

- Direct Wire procedure improvements;
- Public Official communication enhancements;
- SERP Initial Evaluator/Scout training;
- PowerWatch Map enhancements;
- Business Continuity Plan testing;
- Pandemic Plan development; and
- Computer system hardware/software upgrades.

The SERP training, Business Continuity Plan testing, Pandemic Plan development and PowerWatch Map enhancements items are currently being expanded to include KCPL Greater Missouri Operations Company (“GMO”) personnel and facilities. The Direct Wire procedure process is being reviewed and training will be conducted when the process review and approval are completed.

KCPL’s Government Affairs Department has developed a process to improve KCPL’s communication with community leaders during a major storm event. Additional communities have requested, and been granted, access to the Obvient system. KCPL’s IT Department is currently working with these requestors on acquiring equipment, software

and setting access privileges. Meetings with community leaders in GMO's territory are being scheduled. KCPL continues to update its databases containing governmental and emergency contact information. KCPL's Government Affairs Department has developed a process to improve KCPL's communication with community leaders.

Computer system hardware and software upgrades are currently underway or scheduled. The Energy Management System ("EMS") is scheduled for a hardware/software upgrade in 2009. An upgrade to the Outage Management System ("OMS") will be evaluated after GMO and KCPL's systems are incorporated in 2009. The Outage Reporting System ("ORS") or Obvient system's hardware and software are currently being upgraded. The ORS is one of the communication tools used by communities wanting direct access to KCPL for outage information.

Recommendation 6: Consider revising their SERP section on storm reports (page E14-1 of the SERP) to include a determination of lessons learned, improvement opportunities, corrective actions, or other items developed, based on the experience obtained in the storm recovery effort that is the basis of the report.

KCPL will add the recommended sections to its SERP storm report.

Recommendation 7: Evaluate the use of at-home Customer Care Center ("CCC") representatives. The Company should determine the strengths, weaknesses and any cost benefits of this program.

The Company regularly considers the work-from-home call center representative option as part of its disaster recovery and epidemic contingency planning. At this time, the analysis does not support the work-from-home scenario. KCPL will continue to

evaluate as systems are modified, new systems are established and as technology advances.

Recommendation 8: Evaluate the Company's ability to segregate by state the outage calls received in the CCC. If feasible and cost-effective, implement this procedure.

The Company continues to evaluate an effective way to gain outage reporting by state from the IVR and automated outage reporting line. Discussions as to feasibility and to cost-effectively implement this reporting will be held with call center management, IT and impacted vendors.

Recommendation 9: Evaluate the information provided to the CCC representatives during the storms that transfers to the customers. Determine what information is necessary for the customers and what information the Company is able to provide. Provide the customer with a sufficient amount of information that enables them to make crucial decisions.

There are two issues regarding information available to Customer Service Representatives: the relevance and timeliness of the information. Clearly, it is important for "relevant" information be available to call center representatives for customer's to make decisions during a storm or catastrophic event. The struggle for utilities, emergency responders, community agencies and others, is to know what "relevant" information is since what is important during a storm event to any given customer on any given day is unique. In light of that fact, KCPL regularly evaluates the information and tools available to its Customer Service Representatives to provide to the customer information that allows the customer to make decisions during an outage event.

Also, KCPL recognizes the challenge of providing timely information to Customer Service Representative during a very dynamic event, like an ice storm. Although our

Customer Service Representatives have benefited from KCPL's investment in infrastructure and software to allow them access to customer and outage information, as well as periodic updates on restoration efforts provided by management, we continue to use feedback from our reps and customers to evaluate the systems and look for ways to improve the timeliness of this information.

Recommendation 10: Evaluate opportunities to implement the usage of alternative telephone numbers of customers without service to improve the Company's confirmation of customers' outage calls. If feasible and cost-effective, ensure that secondary telephone numbers are obtained and used during restoration periods.

Currently, efforts are underway to evaluate and redefine the CIS tools to ensure the best and most accurate information is used in attempts to reach a customer. In callback situations, the Customer Service Representative would have access to all customer phone numbers on record. The Company will continue to evaluate ways to obtain and use customers' secondary telephone numbers during a storm event.

Recommendation 11: Evaluate the Company's outbound calling potential during future major outages.

Although KCPL successfully utilized outbound calling to customers in confirmation of receipt of the outage report as well as follow-up callbacks to customers reporting an outage after the circuit should have been restored, the Company will continue to evaluate and seek to improve its outbound calling processes and procedures during major outages.

Recommendation 12: Evaluate the CCC's practices and procedures and determine if, during future major outages, the Company can implement more efficient and effective processes.

The Company should address staffing issues, communication issues with customers, and others issues it deems appropriate.

It is KCPL's culture to evaluate internal and business processes in an effort to innovate and continual improve its service. For example, the Company evaluates staffing and communication with customers during its post-storm, Lessons Learned, review.

Recommendation 13: Evaluate the Company's allocation of employees during future major outages.

KCPL always seeks to optimize its call center staffing levels and works to expand available staff during outages by on-going cross training of other departments.

Evaluation of employee allocation is performed regularly and adjusted accordingly to maximize these resources.

Recommendation 14: Ensure that the CCC maintains an adequate number of CCC representatives at all times. Develop contingency plans to address demands associated with major outages.

Call center staffing levels are evaluated frequently and projections of future call volume and staffing requirements are made. The Company maintains a staffing plan to ensure adequate staffing in the call center for routine business as well as emergency situations.

Recommendation 15: Evaluate the Company's ability to provide access to city and county officials to its Web site with information specific to their needs that would benefit these individuals in their decision-making process. Meet with the Company's constituents to determine the desired information and, if feasible and cost-effective, ensure that this agreed upon information is available to these individuals.

Working with Kansas City, Missouri; Overland Park, Kansas and the Johnson County Emergency Management office, KCPL has granted access to the company's Outage Reporting System ("ORS"). The ORS site is secure, requiring a VPN router, software and a company token to generate a security code. KCPL provides the software, token and IT support to gain access and trains the end users. The City of Kansas City, Missouri, was used to test the system.

The Company continues to evaluate and seek feedback from these governmental entities as to relevance and value of the information available and what other information would be useful to these entities during a storm event.

Recommendation 16: Review the Company's public comments following situations when customers might file public comments in the Commission's EFIS to determine areas of customer concerns, customer service quality improvements and areas of success. Address the comment issues and provide necessary follow-up with such customers, when appropriate.

KCPL will review customer comments in the Commission's EFIS following a storm and other catastrophic outage events. All comments will be reviewed and any needed follow-up will be made with the customer.

Recommendation 17: Include the Consumer Services Department in all communications with the Commission during major outages.

KCPL will work to develop a communication plan for the Consumer Services Department during major outages and events.

Recommendation 18: Contact city officials, county officials and agencies twice a year to update telephone and personnel information. Coordinate meetings periodically with these individuals to communicate pertinent Company information.

KCPL meets regularly with city officials, county officials and agencies throughout its service territory. A formal process of gathering the pertinent data will be developed to regularly update contact information.

Recommendation 19: Delegate employee(s) to participate in the SEMA meetings.

KCPL agrees with the recommendation. KCPL's Superintendent of Emergency Response is designated as the SEMA contact. He has arranged with SEMA to get on their distribution list for conference calls, meetings, etc.

Recommendation 20: Designate a Company employee and a back-up employee that Staff working with SEMA will have access to 24/7 during an emergency situation involving KCPL. These employees should be able to respond to Staff's request at the time the Staff calls them.

KCPL has designated Bill Menge as the primary Commission contact. A secondary contact will be identified and all relevant contact information will be communicated to Staff.

Recommendation 21: Develop a database of necessary information to enhance the Company's relationship with the Red Cross and other agencies.

KCPL's Customer Relations currently maintains a database of assistance agencies, churches, seniors' organizations and other organizations, such as the Red Cross. The data maintained includes: business name, address, phone number, key contact people, fax number, and emergency phone number (where applicable). In addition, the database houses information on the organization, such as business hours, services provided, funding information, KCPL information requested/needed, and a summary of outreach contacts by Customer Relations.

Customer Relations developed the database which maintains information about area organizations that serve low-income and elderly customers. The data is updated as organizations' personnel or services change. Customer Relations' goal is to make the database as comprehensive as possible, and continues to update information as the company is made aware of new organizations or the closure of existing organizations.

Recommendation 22: Evaluate creative and enhanced methods of providing information to the Company's customers during major outages.

KCPL offers updated outage information through its Website. Customers have access to this information and may receive similar information from Customer Service Representatives during a call to the company. The processes, procedures, relevance of information and technology will continue to be evaluated with an eye to improving the company's storm response.

In addition, radio and television will continue to be used to communicate with the public at large anything that would impact their service.

Recommendation 23: 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.

KCPL filed its Vegetation Management Compliance Plan with the Commission on July 1, 2008, and is waiting for the Commission's review and approval of the plan. KCPL's plan addresses and incorporates the changes required under the vegetation management rule.

Recommendation 24: Revise operation standards to incorporate the Commission's Electrical Corporation Infrastructure Standards, 4 CSR 240-23.020, which became effective on June 30, 2008.

KCPL filed its Infrastructure Standards Compliance Plan with the Commission on July 1, 2008, and is waiting for the Commission's review and approval of the plan.

KCPL's plan addresses and incorporates the changes required under the infrastructure standards rule.

Respectfully submitted,

By: /s/ Curtis D. Blanc

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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 15th day of August, 2008, to:

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