

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of an Incident on	)	
February 4, 2009 at the Iatan	)	Case No. ES-2010-0009
Generating Plant Operated by Kansas	)	
City Power & Light Company.	)	

**RESPONSE OF KANSAS CITY POWER & LIGHT COMPANY**

Pursuant to the Order Directing Kansas City Power & Light to Respond To Staff's Final Report ("Order Directing Response") issued on February 2, 2010 by the Missouri Public Service Commission ("Commission") in the above-captioned proceeding, Kansas City Power & Light Company ("KCP&L") respectfully submits the following response.

1. Staff filed its Final Report on January 29, 2010. In its Final Report, Staff recommended that KCP&L "file a response to this incident report". As such, the Commission directed KCP&L to respond to Staff's Final Report no later than March 5, 2010.

2. Staff's Final Report included the following recommendations:

- KCP&L include a review of high differential expansion and its consequences in the training of its operators of the Iatan units.
- KCP&L include the high differential expansion instrumentation in its annual maintenance plan of the Iatan units.
- KCP&L should investigate the possibility of a similar occurrence at the other coal plants owned by KCP&L. If there is a possibility of a similar occurrence, KCP&L should implement the actions that it took in response to this incident with regard to these other plants.



- The Commission order KCP&L to file a response to this incident report which contains the results of its investigation at coal plants owned by KCP&L and any subsequent actions taken at those plants within thirty (30) days of a Commission order adopting the Staff's recommendations.

3. KCP&L accepts these recommendations and appreciates the efforts of Staff to understand this uncommon event and to thoroughly understand the root cause and the Company's subsequent response.

4. Additionally, KC&PL has already completed, or is in the process of completing, a number of actions consistent with Staff's recommendations:

- As noted in the Staff report, KCP&L immediately revised the Iatan Unit 1 startup operation procedures to avoid high differential expansion problems, revised the Iatan Unit 1 operator's control screens to include a graphic of the differential expansion values, and added a high differential expansion trip which would shutdown the unit at a preset level of differential expansion.
- KCP&L has prepared new training materials and updated the Iatan operator guides to emphasize differential expansion.
- The Company has increased its awareness of differential expansion risk by having the Plant Management of all KCP&L and KCP&L Greater Missouri Operations Company (GMO) coal units review their start-up procedures and alarm/trip settings for differential expansion exposure.



- KCP&L Engineering is in the process of evaluating the feasibility of creating standard procedures concerning differential expansion.

5. KCP&L will adopt the Staff's recommendations. Each recommendation is separately addressed in the following.

- "KCP&L include a review of high differential expansion and its consequences in the training of its operators of the Iatan units."

KCP&L agrees with this recommendation and as previously noted, has completed steps to include differential expansion details in the Iatan operator training materials. The Company will continue to expand and refine the differential expansion topics included in the Iatan training curriculum. The materials will complement the new control screen graphics and start-up procedures revised following the incident.

- "KCP&L include the high differential expansion instrumentation in its annual maintenance plan of the Iatan units."

KCP&L agrees with this recommendation and will immediately add high differential expansion instrumentation to the regular maintenance plan and the major planned outage maintenance plan for Iatan Unit 1. The Iatan Unit 1 is currently maintained on an eighteen-month outage cycle.

Iatan Unit 2 maintenance plans are under development but KCP&L commits to adding high differential expansion instrumentation to the plans.

- "KCP&L should investigate the possibility of a similar occurrence at the other coal plants owned by KCP&L. If there is a possibility of a similar occurrence,



KCP&L should implement the actions that it took in response to this incident with regard to these other plants.”

KCP&L agrees with this recommendation. KCP&L Engineering is currently investigating the possibility of differential expansion occurring at other KCP&L and GMO coal units and will implement similar corrective actions if warranted. A wide variety of steam turbines are deployed within the Company’s combined fleet and each unit displays unique operating characteristics. KCP&L will assess the risk of occurrence for each unit and direct corrective actions at those that display a reasonable probability of occurrence. This assessment is scheduled to be completed by the end of June 2010 with corrective actions to follow as soon as unit operation will allow.

- “The Commission order KCP&L to file a response to this incident report which contains the results of its investigation at coal plants owned by KCP&L and any subsequent actions taken at those plants within thirty (30) days of a Commission order adopting the Staff’s recommendations.”

KCP&L agrees with this recommendation and is willing to file a summary of the actions taken. However, as mentioned previously, KCP&L expects the assessment to be completed by the end of June 2010. KCP&L would like to request that the report be due by July 30, 2010 to allow the complete results to be communicated to the Commission.

6. KCP&L respectfully requests that the Commission accept this response to Staff’s Final Report.



Respectfully submitted,

/s/ Roger W. Steiner

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**Attorneys for Kansas City Power & Light  
Company**

Dated: March 5, 2010



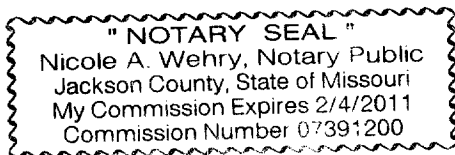
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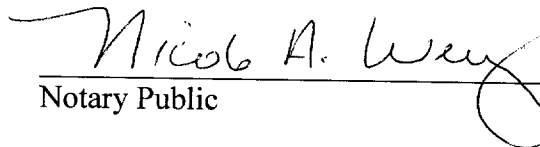
State of Missouri     )  
                                  ) ss  
County of Jackson    )

I, Tim Rush, having been duly sworn upon my oath, state that I am Director, Regulatory Affairs of Kansas City Power & Light Company, that I am duly authorized to make this affidavit on behalf of KCP&L Greater Missouri Operations Company, and that the matters and things stated in the foregoing response are true and correct to the best of my information, knowledge and belief.

  
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Tim Rush

Subscribed and sworn before me this 5<sup>th</sup> day of March, 2010.



  
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Notary Public



**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing response was served on all counsel of record either by electronic mail or by first class mail, postage prepaid, on this 5th day of March, 2010.

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/s/ Roger W. Steiner

Roger W. Steiner