

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 (“KCP&L” or the “Company”) and makes its response pursuant to the September 9, 2008, *Order Directing Further Response to Staff’s Final Report* concerning its investigation of KCP&L’s Storm Preparation and Restoration.

Recommendation 1: KCP&L 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 KCP&L should be considered for implementation.

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2) Improve KCP&L'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).

KCP&L's 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, KCP&L initiated contact with local EOCs in the communities it serves. KCP&L's Superintendent of Emergency Response attends monthly meetings with numerous groups representing local EOCs. Also, KCP&L's Superintendent of Emergency Response contacted SEMA in April 2008 to request KCP&L representatives be included in teleconferences, meetings and relevant SEMA activities. KCP&L representatives are now contacted when SEMA activates their EOC.

Recommendation 2: KCP&L should consider separating the data displayed on their PowerWatch Website and other sources to show Missouri and Kansas service areas as discrete data. It is understood that some circuits cross state boundaries and this may be difficult to accomplish 100% of the time. Additionally, KCP&L should verify consistency of PowerWatch Website statistics with other internal company databases.

Obvient is the system that feeds information to the PowerWatch map.

KCP&L purchased an upgrade to the Static Content Generator for the Obvient system. Contemporaneous with the upgrade, the map software was improved from Microsoft's MapPoint to Microsoft's Virtual Earth.

Outage and restoration statistics provided on the PowerWatch map are pulled from the same databases used by the Outage Reporting System ("ORS"), which is connected to the Outage Management System ("OMS"). These databases contain the best available data for populating the PowerWatch map statistics.

Upgrading the map software and changing the PowerWatch map to show customer outages by state is scheduled for completion by December 31, 2008.

Recommendation 3: KCP&L 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 SEMA teleconferences when the State Emergency Operations Center is activated.

A request was submitted in April 2008 to SEMA to include KCP&L's Superintendent of Emergency Response on their distribution and telephone lists for notification meetings, conference calls, and relevant activities. KCP&L representatives are now included as part of SEMA's call-list when SEMA activates its EOC.

KCP&L's Manager of Safety and Medical works with the Department of Transportation.

KCP&L's Customer Relations' group contacts major agencies during significant customer interruption events to communicate KCP&L's status of operations and gather information on the agencies' operations.

KCP&L's Manager of Customer Relations is initiating contact with the Department of Health and Senior Services and the Department of Social Services by November 30, 2008, to start a dialogue with both agencies regarding significant customer interruption events and other customer issues.

KCP&L has identified two principal contacts for communicating with the Commission and staff 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 and Staff 24/7 during the pendency of the event. The contacts will have access to key "command and control" personnel and KCP&L's EOC operation. Contact information was provided to the Commission.

Recommendation 4: KCP&L, 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.

KCP&L's Superintendent of Emergency Response contacted Ameren and Westar concerning storm restoration practices. KCP&L hosted a meeting 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.

KCP&L is happy to host a storm response round-table with Staff at a mutually convenient time and invite other Missouri electric utilities. At such time, it is expected a consistent methodology for future storm reports will be discussed.

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 Direct Wire procedure improvements, SERP training, PowerWatch Map enhancements, Business Continuity and Pandemic Plan development and

testing are being coordinated by KCP&L's Superintendent of Emergency Response. These items continue to be evaluated and updated to include the KCP&L Greater Missouri Operations Company's ("KCP&L-GMO") territory.

The Direct Wire procedure is under review by the engineer assigned the duty during a major event. In addition to KCP&L operations, each KCP&L-GMO service center is being evaluated for inclusion in the procedure. This review and training is scheduled for completion by January 31, 2009.

SERP training is a continuous process. As new people are assigned SERP roles, training is conducted using on-line and classroom resources. Annual tabletop and/or simulated exercises are also conducted. This training includes some of our customers from time-to-time. On October 29, 2008, KCP&L hosted a tabletop exercise that included Overland Park, Olathe, Johnson County Emergency Management and WaterOne. A similar tabletop was conducted with Kansas City, Missouri in November 2006. KCP&L's Superintendent of Emergency Response is responsible for staffing and training on SERP.

Please refer to the Update to Recommendation No. 2 regarding the status of the PowerWatch Map enhancements.

Business Continuity and Pandemic plans were developed by KCP&L's Delivery Home Cost Centers ("HCC"). The inclusion of KCP&L-GMO sites into the plans is currently underway. The Distribution System Operations and Transmission System Operations departments were identified as key departments. KCP&L's Superintendent of Emergency Response is responsible for drafting their plans on an expedited schedule with completion expected by December 31, 2008.

All other plans in the Delivery Division will be updated or completed and tested by KCP&L's Superintendent of Emergency Response by March 31, 2009.

KCP&L's Government Affairs Department developed a process to improve the Company's communication with community leaders during a major storm event. A list of key contacts was created. When a major event happens, an e-mail is created and distributed to the key contact list. The e-mail will be sent three or four times a day on a four hour interval, until the event is over. Additionally, Governmental Affairs' liaisons will call their assigned stakeholder and provide updates based, in part, on how frequently they indicated they wanted to be contacted.

Energy Solution Consultants will contact KCP&L's Tier One customers, high-use industrial and commercial customers, and give them the option of receiving pages notifying them of extended outages and updates. Tier One customers have expressed wanting this notification and are appreciative of this process.

Computer system hardware and software upgrades are currently underway or scheduled to be completed. The Energy Management System ("EMS") is scheduled for a hardware/software upgrade in June 2009. An upgrade to the Outage Management System ("OMS") will be evaluated, along with ServiceOn, KCP&L-GMO's system. The Outage Reporting System ("ORS") hardware and software are currently being upgraded and will be completed by year-end 2008. All of the computer system hardware and software upgrades are managed through their respective departments in Information Technology ("IT").

Recommendation 6: Consider revising the 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.

The SERP manual is in the process of being revised by KCP&L's Superintendent of Emergency Response. The Company anticipates that it will be re-issued during the 1st quarter of 2009. Revisions to the report for a Class IV storm paragraph will incorporate the recommended points.

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. It was again considered as part of the integration of KCP&L's and KCP&L-GMO's call center operations. At that time, the analysis continues to not support the work-from-home scenario. KCP&L 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.

KCP&L's Manager of Customer Services was tasked to discuss with 21st Century Communications ("TFCC") the feasibility and cost of segregating the outage calls received in the CCC. It is expected those discussions will be completed by December 31, 2008.

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.

Continuing evaluations and discussions are held cross-functionally within Customer Services as well as Operations, including Dispatch and Outage Management, seeking the most effective method and vehicle for communication during a storm event.

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.

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. KCP&L's Manager of Customer Services is managing this project and it is expected to be complete by November 30, 2008.

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

The outbound calling vendor used by KCP&L is 21st Century Communications ("TFCC"). TFCC provides an outbound calling capacity that

exceeds the potential demand by KCP&L. Therefore, the outbound calling response to outages has capacity to expand. KCP&L continues to evaluate what information to convey to customers in this situation. The current process calls for the CCC inputting data into the OMS and then TFCC processes the input. This process is being reviewed by KCP&L's Manager of Customer Services and TFCC with a goal of streamlining the entire process. The Manager of Customer Services has targeted completion of the project by December 31, 2008.

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 other issues it deems appropriate.

The post-storm lessons learned process continues following storm events and after each significant outage or systems event, i.e. IT upgrades, IVR outages, CIS maintenance. Improving operations and, in turn, improving service is the primary focus with KCP&L's Customer Service group. The goal for completing this evaluation is having the lessons learned discussion within ten days of the outage or systems' event. KCP&L's Manager of Customer Services is tasked with completing this review and evaluation.

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

A contingency plan to move non-call center employees to assist in the call center during significant storm or outage events is being developed. A portion of the project to compile employee names, contact information and training is

complete. The Company is working with union leadership to finalize the plan.

KCP&L's Manager of Customer Services is tasked with this project, which is scheduled for completion by December 31, 2008.

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.

A project to compile employee names, contact information and training has already been completed. This was done in preparation for the possible need to move non-call center employees to assist in the call center during significant storm events. Completion of this process requires internal discussion with the union leadership. This project is targeted for completion by December 31, 2008.

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.

About two years ago, KCP&L began to grant access to information that supplements PowerWatch. Working initially with the Emergency Operations group from Kansas City, Missouri, KCP&L's Superintendent of Emergency Response and IT department continue to work with Overland Park, Olathe, and Johnson County Emergency Management on access to the system. The access is also available to all city and county officials in KCP&L's service territory. KCP&L's Superintendent of Emergency Response meets regularly with these

stakeholders to discuss the availability of the system and the process to connect into the system.

Recommendation 16: Review the Company's public comments following situation 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.

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

KCP&L has identified two principal contacts for communicating with the Commission and staff 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 and Staff 24/7 during the pendency of the event. The contacts will have access to key "command and control" personnel and direct communication with KCP&L's EOC operation. Contact information has been provided to the Commission.

SEMA conducts conference calls at 9 AM and 3 PM daily. Information on KCP&L's situation will be given to the Commission prior to each call. In addition, KCP&L's Superintendent of Emergency Response or appointed backup will also participate in the conference calls.

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.

KCP&L's Superintendent of Emergency Response maintains a list of city and county officials. Twice a year, contact information is updated on the list. In conjunction with Government Affairs, KCP&L's Superintendent of Emergency Response meets periodically with city and county officials. Customer Contact maintains a list of agencies and also updates their list twice a year. These lists were last updated in September 2008.

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

KCP&L's Superintendent of Emergency Response, has arranged with SEMA for KCP&L to be placed on their distribution list for conference calls, meetings, relevant activities.

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 KCP&L. These employees should be able to respond to Staff's request at the time the Staff calls them.

KCP&L has identified two principal contacts for communicating with the Commission and staff 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 and Staff 24/7 during the pendency of the event. The contacts will have direct access with key "command and control" personnel and direct access with KCP&L's EOC operation. Contact information has been provided to SEMA.

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

KCP&L's Customer Relations group maintains a database of assistance agencies, churches, seniors' organizations, Red Cross, and other agencies. 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 22: Evaluate creative and enhanced methods of providing information to the Company's customers during major outages.

The processes, procedures, relevance of information and available technology will continue to be evaluated with an eye to improving the Company's storm response communication ability. KCP&L has established process improvement teams, IDEAL Partners, that regularly investigate and consider ideas to improve methods, policies, and procedures in operating the Company and enhancing customer 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.

KCP&L filed its Vegetation Management Compliance Plan with the Commission on July 1, 2008. KCP&L's plan addresses and incorporates the changes required under the vegetation management rule. KCP&L started implementing the plan changes in January 2008. By July 1, 2008 the plan was fully implemented.

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.

KCP&L filed its Infrastructure Standards Compliance Plan with the Commission on July 1, 2008. KCP&L's plan addresses and incorporates the changes required under the infrastructure standards rule. KCP&L's Manager of T&D Engineering and Asset Management and his team are developing the portfolio of maintenance programs to be implemented in 2009.

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 10th day of November, 2008, to all counsel of record.

/s/ *Curtis D. Blanc*

Curtis D. Blanc