

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

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

STAFF'S SUPPLEMENTAL REPORT

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and submits this Supplemental Report evaluating Aquila Inc.'s (Aquila 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:

1. On January 2, 2008, the Commission issued an order directing Staff to investigate Aquila'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.
2. Staff's June 17, 2008 Final Report contained eighteen (18) recommendations on how Aquila could improve its response in future storms. Aquila filed a response to Staff's recommendations on August 15, 2008.
3. On September 9, 2008, the Commission issued an order directing "Aquila 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 Dan Beck, Utility Regulatory Engineering Supervisor, and Lisa Kremer, Utility Management Manager.

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

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

Respectfully submitted,

/s/ Jennifer Hernandez

Jennifer Hernandez

Legal Counsel

Missouri Bar No. 59814

Attorney for Staff of the
Missouri Public Service Commission
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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-2008-0220, Investigation of Aquila, Inc.'s Storm Preparation and Restoration Efforts

FROM: Dan Beck, Energy Department – Engineering Analysis
Lisa Kremer, Utility Regulatory Manager

/s/ Lisa Kremer 1/9/09
Engineering and Management
Services 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 Aquila, Inc.'s Status Update to Staff Recommendations Regarding Storm Preparation and Restoration Efforts. The status update was submitted to the Staff on November 10, 2008 to comply with a Commission Order issued September 9, 2008. The Order also required a Supplemental Report from the Staff.

Aquila, Inc. was acquired by Great Plains Energy Company, the parent company of Kansas City Power & Light Company (KCP&L), on July 14, 2008, and is authorized to be doing business as KCP&L Greater Missouri Operations Company (GMO). The Commission approved the change of name Aquila, Inc., d/b/a/ Kansas City Power & Light Company to KCP&L Greater Missouri Operations Company in its November 20, 2008 Report And Order in Case No. EN-2009-0164. Staff has been made aware of instances where GMO is doing business as KCP&L and Staff is evaluating the matter as to what action, if any, should be taken by Staff.

The Final Report of Staff's Investigation filed in Case No. EO-2008-0220 included eighteen (18) recommendations for improvement. Based on the Staff's evaluation of GMO's compliance with the recommendations contained in the Final Report, the following Staff determinations resulted:

1. GMO has agreed with the substance of all the recommendations and has initiated or completed action to implement appropriate changes to its procedures, processes, and policies.
2. GMO indicates that actions are completed on approximately 80% of the Staff's recommendations. Three additional items are scheduled for completion by January 31, 2009, and include enhancements to GMO's PowerWatch map accessible through its website. GMO has indicated that its Emergency Service Restoration Plan (ESRP) is on target to be completed by March 31, 2009.

3. One remaining action is scheduled for completion in the first half of 2009 or will be completed at a time to be determined (this item includes GMO's participation in a storm restoration workshop). GMO's Superintendent of Emergency Response held a meeting in Kansas City with AmerenUE and Westar in September 2008 to address storm restoration topics, followed by a meeting in October 2008 held in St. Louis, Missouri.
4. The scheduled completion dates for all pending items appear reasonable.

Staff has determined that GMO has achieved compliance with Staff's recommendations or is taking appropriate action to do so.

Staff will continue to monitor the progress of completion of GMO's actions. The recent acquisition of Aquila, Inc. by Great Plains Energy is likely to include integration of KCP&L's corrective actions with GMO's corrective actions, where appropriate. The completion and effectiveness of that integration of KCP&L's and GMO's emergency response plans will be monitored by Staff.

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Case No. EO-2008-0220

AFFIDAVIT OF DANIEL I. BECK

STATE OF MISSOURI

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COUNTY OF COLE

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Daniel I. Beck, 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.

Daniel I. Beck

Daniel I. Beck

Subscribed and sworn to before me this 8th day of January, 2009.

Susan L. Sundermeyer
Notary Public



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

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In the Matter of an Investigation of Aquila,
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Case No. EO-2008-0220

AFFIDAVIT OF LISA A. KREMER

STATE OF MISSOURI

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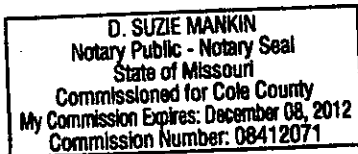
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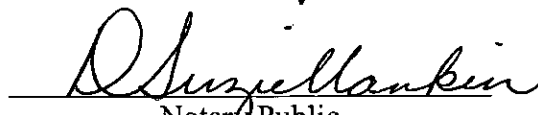
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Lisa A. Kremer, of lawful age, on her oath states: that she has participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was developed 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.


Lisa A. Kremer

Subscribed and sworn to before me this 8th day of January, 2009.




Notary Public