

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

Report filed on June 17, 2008. Michael Taylor, Staff Engineering Specialist II, prepared the report attached hereto, which contains more direct and concise response to the questions, including references to the Report where applicable and additional information gathered since the Report was filed.

WHEREFORE, Staff respectfully submits its Response To Commissioner Questions.

Respectfully submitted,

/s/ Jennifer Hernandez

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 5th day of August 2008.

/s/ Jennifer Hernandez

Commissioner Questions

KCP&L

1. Analysis of the age, siting, durability and quality of the utility's infrastructure, including the placement of distribution lines in light of the ice storm outages of 2007.

Neither Staff nor KCP&L have conducted this type of analysis. The recent rulemaking (4 CSR 240-23.020 Electrical Corporation Infrastructure Standards, effective June 30, 2008) will provide information that would provide data and empirical information that will enhance analysis of this type for future events. The first compliance report required by this rule will be filed no later than July 1, 2009. However, it should be noted that under the requirements of this rule, the inspection of all electric utility infrastructure might not be completed for 12 years, due to the specific inspection interval requirements contained in the rule.

2. A comprehensive compliance review of Commission Orders stemming from prior storms and outages applicable to the utility.

Staff is not aware of any specific Commission Orders from prior storms that would be applicable to KCP&L. The most recent KCP&L storm event, which was reviewed and reported on by Staff, occurred in January/February 2002. Staff issued a report that contained six recommendations for KCP&L. Those recommendations were reviewed relative to KCP&L's performance during the December 2007 storm. Staff's review and analysis was documented on pages 70 through 73 of the Staff Report filed in Case No. EO-2008-0219. In summary, Staff determined that compliance was achieved for five recommendations and one recommendation, concerning ongoing liaison with city officials and agencies, had partial compliance. This partial compliance had minimal impact during the December 2007 storm.

3. An analysis of all assistance requested or offered and whether the utility accepted or denied the offers of assistance by other entities.

Prior to and during this storm event, there were limited outside resources available. This storm and earlier storms had affected large portions of the central United States. KCP&L attempted to utilize the Midwest Mutual Assistance Group however all locally available personnel had been requested by and dispatched to assist Oklahoma utilities. KCP&L requested assistance from Ohio and Michigan utilities, but those crews were subsequently diverted to Aquila, based on KCP&L restoration progress. KCP&L utilized internal crews and on-site contractor crews (24 line crews and 40 vegetation crews) for restoration from the December 2007 storm.

4. An analysis of the Call Center operations during the storm and any observations about customer service issues.

KCP&L utilizes numerous methodologies for customers to report outages and obtain information. Customers that call will either report information to a KCP&L customer care representative, Twenty First Century (a vendor system that provides call center support during peak periods), or self-service using an automated system. During significant events such as the December 2007 storm, the number of customer calls can increase by at least an order of magnitude. Customers can also report outages via KCP&L's website. KCP&L utilizes an automated meter reading system that automatically reports customer outages. These inputs are integrated in KCP&L's Outage Management System.

The Company utilized verification calls to customers to acknowledge their reported outage. The Company also performed restoration verification calls to customers. Based on statistical information, it appears that the KCP&L website was used extensively by customers during the December 2007 storms.

The Company also placed special emphasis on communications with registered medical needs customers, Gatekeeper customers, energy solutions customers, industrial customers, assistance agencies, senior centers, and nursing homes.

Media communications began on Friday, December 7 and continued through the storm event and restoration.

Staff provided additional details on this topic in the main body of its report and included recommendations for improvement opportunities in the report.

5. An analysis of the utility's current tree trimming schedule and input on whether there is a need to amend the current program or consider alternative programs suggested through other Commission cases.

KCP&L has stated that their vegetation management program is aligned with the recently adopted 4 CSR 240-23.030 Electrical Corporation Vegetation Management Standards and Reporting Requirements, which became effective June 30, 2008. At the time of the storm, KCP&L's vegetation management program was within 3% of overall scheduled miles.

The new rule will provide information that would provide data and empirical information that will enhance analysis for future events. The first compliance report required by this rule will be filed no later than April 1, 2009. However, it should be noted that under the requirements of this rule, the completion of the first vegetation management cycle will not be completed until four years following the effective date of the rule for urban areas and six years following the effective date of the rule for rural areas, due to the specific vegetation management interval requirements.

4 CSR 240-23.010 Electric Utility System Reliability Monitoring and Reporting Submission Requirements was effective July 30, 2008. This rule will require reporting of worst performing circuits and actions taken (or planned) to improve the performance of these circuits. Additionally, reporting will include reliability improvement programs that are being implemented by the utility.

As utility compliance reports are filed in accordance with these new rules, Staff will be able to evaluate if the current programs are effective or if rule amendments/alternative programs should be recommended.

6. An evaluation of the communication, cooperation and assistance between the affected utilities, citizens and city, county and state officials.

Communications with individual customers is addressed in the response to Question 4 (above).

Responses to Questions 3 and 9 (in this document) provide information relative to interaction with other utilities.

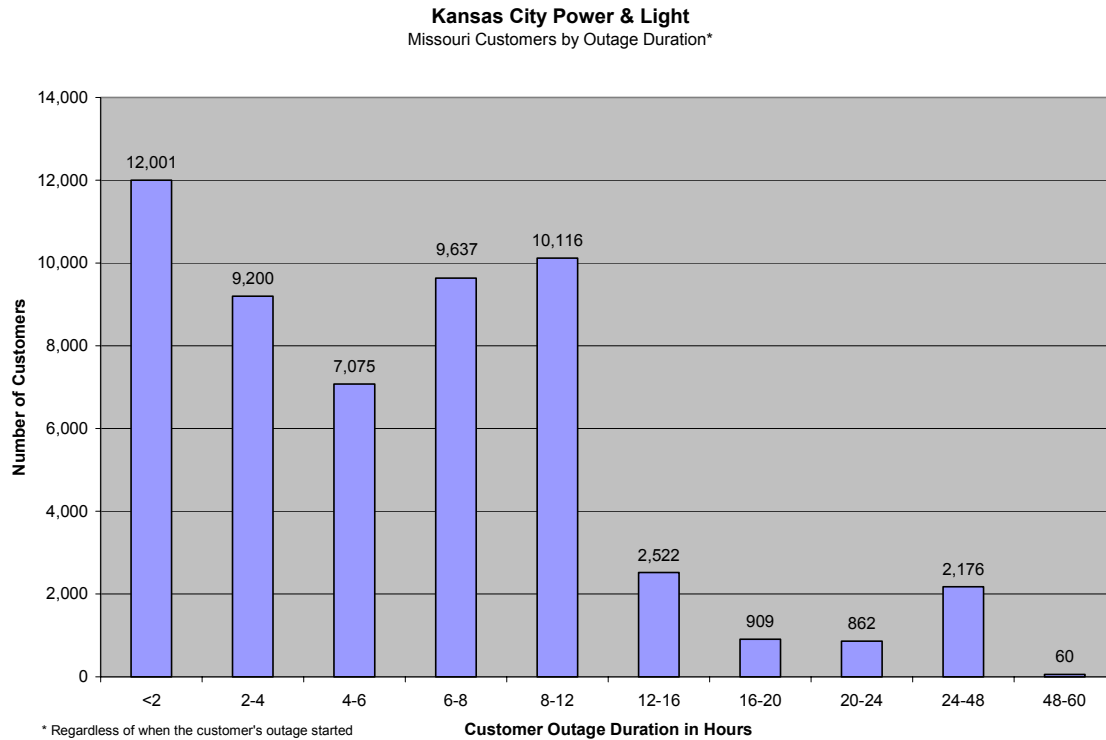
The response to this question will focus on the communication, cooperation, and assistance between KCP&L and local (city and county) and state officials. The State Emergency Management Agency (SEMA) activated their Emergency Operations Center on December 9. SEMA returned to normal operational status on December 18. KCP&L did not directly participate in periodic SEMA teleconferences. Staff has made a recommendation that KCP&L could coordinate their communications with state government agencies (and some local agencies) through participation in the SEMA teleconferences.

Following the January/February 2002 ice storm, Staff prepared a report for the three affected utilities. The report contained recommendations for the utilities. One of the recommendations for KCP&L was: "Contact city officials and agencies impacted by extended electric outages twice a year to update telephone and personnel changes." In reviewing KCP&L's performance during the December 2007 storm relative to this 2002 recommendation, Staff determined that KCP&L could enhance their communication with city officials and agencies. While Staff believes this is a valid recommendation, there were not significant impacts relative to this issue during the December 2007 storm. Due to the nature of this storm event in the Kansas City area, the Kansas City emergency operations center was only open for a short period of time due to limited impact on the city infrastructure.

The four counties in KCP&L's service area that were impacted by the December 2007 storm included: Cass, Clay, Jackson, and Platte. Some of these counties participated in the SEMA teleconferences between December 10 and December 14. Based on the Situation Reports issued by SEMA following each of the teleconferences, none of the four affected counties expressed any significant concerns relative to KCP&L restoration activity. Shelters were available in Clay and Jackson counties. SEMA reported that one person utilized a shelter in Clay County for one day; otherwise the shelters were not utilized.

7. If any of the utility's service area lost electrical service for a prolonged amount of time, provide an analysis of what caused the prolonged outage.

KCP&L customers were affected from the evening of Monday, December 10 until the evening of Thursday, December 13. A total of 54,558 Missouri customers were affected. This number of customers is 20.1% of the approximately 271,000 Missouri customers. The graph shown below illustrates the number of customers and their associated outage duration.



Utilizing this graph, Staff calculated a normalized customer outage duration of 7.2 hours. While some outages were significantly longer than this normalized duration, it is evident that a large percentage (88%) of the customers was restored in 12 hours or less. Based on this data and the relative lack of input from the KCP&L customers into the Missouri Public Service Commission's consumer complaint and public comment databases, Staff determined that the outages were not prolonged sufficiently to necessitate an analysis.

8. An assessment of the coordination of efforts to ensure that critical operations facilities such as hospitals, residential care facilities, police and fire department buildings had temporary electric needs satisfied until service from the grid could be restored.

Most critical care facilities such as hospitals are required by state and federal regulation to have standby emergency generation for certain circuits and functions. For example, the Department of Health and Senior Services, Division of Regulation and Licensure, has regulations for hospitals in 19 CSR 30-20 that require standby emergency generation for certain circuits and functions with sufficient fuel on site to ensure continuous operation for twenty-four (24) hours. However, many residential care facilities do not have similar requirements and do not have standby emergency generation.

KCP&L's Storm Evaluation & Restoration Plan establishes priorities for service restoration. The highest priority is situations that are an immediate threat to public safety. The second highest priority includes hospitals, city halls, county court houses, fire alarm system headquarters, water pumping stations, sewer lift stations, fire stations, police stations, air traffic control center, etc. (residential care facilities are not specifically on KCP&L's list of priorities).

The Public Service Commission Staff participated in the emergency management efforts of the State Emergency Management Agency (SEMA) during KCP&L's storm restoration of the December 2007 Ice Storms. This included having a Commission Staff member onsite at SEMA's Emergency Operations Center (EOC) for an average of 10 hours on a typical day. The Staff also participated in twice-daily conference calls that included many state agencies, county EOCs, municipal EOCs or officials, federal agencies, and non-government/volunteer organizations. One of topics that is frequently dealt with at SEMA's EOC and during the conference calls is the need for emergency generation or fuel for emergency generation. Requests for emergency generation needs are typically raised during the conference calls or are directly requested from the county or municipal agency where the need occurs. During the first 48 to 72 hours of a major storm event, such as the December 2007 Ice Storm, significant resources of the state emergency management function are devoted to the need for and the transportation of electrical generators. Typically, the need for fuel for generators occurs after the first 24 hours. State agencies that are involved in the electrical generator work include SEMA, National Guard, Office of Administration, Department of Natural Resources and the PSC. In addition, the Staff coordinates requests for restoration of critical facilities throughout the storm restoration process.

9. An assessment of the interdependence among all PSC certificated utilities as well as with utilities not certificated by the PSC in the affected area.

Due to the scenario for the December 2007 ice storms, the interdependence of the utilities (certificated and non-certificated) was limited. Since all certificated utilities and most non-certificated utilities were affected, their ability to provide local mutual assistance was limited. The rural electric cooperatives were able to provide some mutual assistance within their member organizations since some of their service areas did not experience icing conditions. Mutual assistance from adjacent states was limited due to either utilities being directly affected by the same winter storms or utilities committed to provide assistance to locations that were affected earlier by the storms. Some examples of adjacent states being affected include: Oklahoma Gas & Electric, 300,000 customers interrupted (762,000 total customers) over a period from December 9 through December 20 and Westar Energy, 360,000 customers interrupted (674,000 total customers) over a period from December 10 through December 20.

When KCP&L completed their own restoration, crews were dispatched to Aquila and Westar Energy to assist in their restoration.

10. An analysis that includes a comparison of utility performance with other utilities that had significant outages during the same time period.

All four Missouri investor owned electric utilities, many municipal electric utilities, and many rural electric cooperatives were affected by the December 2007 ice storms. Over 300,000 electrical customers were interrupted statewide. The State Emergency Operations Center was activated from December 9 to December 18.

The following table provides data (some numbers rounded) for the four utilities.

Utility	Total Missouri Customers	December 2007 Storm Customer Interruptions	Percent of Total Customers Interrupted	Start of Interruptions	End of Interruptions (Note 1)
AmerenUE	1,180,000	97,000	8.2%	12/09/07	12/13/07
Aquila	308,000	84,000	27.3%	12/09/07	12/18/07
Empire	144,000	65,000	45.1%	12/09/07	12/19/07
KCP&L	271,000	54,558	20.1%	12/10/07	12/13/07
Total	1,903,000	300,558	15.8%	12/09/07	12/19/07

Note 1: Some customer interruptions may have lasted longer due to customer restoration responsibility.

11. If damage was caused by vegetation, a detailed overview of the type and extent of damage caused by various scenarios including whether the vegetation was located in the easement or right of way, whether the vegetation fell from outside the right of way, whether the vegetation was diseased or particularly weak, whether the vegetation fell vertically from above the electrical conductors and whether the vegetation had been appropriately addressed prior to the storm in accordance with the utility's vegetation management plan. Further, what percentage of the damage would have been prevented by the utility strictly adhering to its vegetation plan? What percentage of the damage would have been prevented by the utility if strictly adhering to the vegetation management plan proposal attached to this Opinion?

Detailed information is not available to support an analysis of this type. 4 CSR 240-23.030 Electrical Corporation Vegetation Management Standards and Reporting Requirements became effective June 30, 2008.

This rule will provide information that would provide data and empirical information which will enhance analysis of this type for future events. The first compliance report required by this rule will be filed no later than April 1, 2009. However, it should be noted that under the requirements of this rule, the completion of the first vegetation management cycle will not be completed until four years following the effective date of the rule for urban areas and six years following the effective date of the rule for rural areas, due to the specific vegetation management interval requirements.

Additionally, Staff intends to facilitate a workshop to discuss the storm reports filed for all four electric utilities. An expected topic of that workshop will be enhanced acquisition of forensic data during storm recovery efforts. This forensic data, in conjunction with the data obtained via the Electrical Corporation Infrastructure Standards and Electrical Corporation Vegetation Management Standards and Reporting Requirements rules, will enable the electric utilities and Staff to perform a more rigorous analysis of the damage incurred due to storms of varying magnitudes.

12. If the damage was caused by infrastructure failure aside from vegetation contact, identify more detailed reasons how and why the infrastructure failed, i.e., age, design, etc., and what can be done to strengthen the infrastructure.

Detailed information is not available to support an analysis of this type. 4 CSR 240-23.020 Electrical Corporation Infrastructure Standards became effective June 30, 2008.

This rule will provide information that would provide data and empirical information which will enhance analysis of this type for future events. The first compliance report required by this rule will be filed no later than July 1, 2009. However, it should be noted that under the requirements of this rule, the inspection of all electric utility infrastructure may not be completed for 12 years, due to the specific inspection interval requirements.

Additionally, Staff intends to facilitate a workshop to discuss the storm reports filed for all four electric utilities. An expected topic of that workshop will be enhanced acquisition of forensic data during storm recovery efforts. This forensic data, in conjunction with the data obtained via the Electrical Corporation Infrastructure Standards and Electrical Corporation Vegetation Management Standards and Reporting Requirements rules, will enable the electric utilities and Staff to perform a more rigorous analysis of the damage incurred due to storms of varying magnitudes.

13. An analysis of the economic impact on customers who experienced a disruption of power during the ice storms.

Staff did not perform a specific analysis of the economic impact on KCP&L customers. However, based on review of contemporaneous information, it appears that KCP&L customers did not experience significant economic impact or in the alternative did not make that impact known through the Missouri Public Service Commission consumer complaint or public comment data bases. KCP&L had approximately 271,000 retail customers at the time of the December 2007 storm. 54,558 of these customers experienced outages. 48,029 of the customers (88%) who experienced outages were restored in 12 hours or less. No complaints were received from KCP&L customers based on the December 2007 storm outages. Seven public comments were received based on the December 2007 storm. None of these public comments specifically mentioned economic impact.

A Federal Emergency Management Agency (FEMA) Disaster Declaration was issued for the December ice storms. The four affected counties in KCP&L service territory (Cass, Clay, Jackson, and Platte) were not included in this declaration.

A March 10, 2008 press release from FEMA indicated that as of that date, \$6,941,209 had been committed to the State of Missouri to reimburse local governments and various nonprofit entities for their December 2007 ice storm related expense. Estimated statewide ice storm damage for public facilities was approximately \$35,000,000. Cass, Clay, Jackson, and Platte counties were not included on the list of counties that received more than \$100,000.

14. Any and all recommendations to improve utility response to weather related and day to day electric outages in the future.

Staff included twenty four (24) specific recommendations for KCP&L in the Staff Report filed in Case No. EO-2008-0219. These recommendations are listed on pages 77 through 80 of that report.