William P. Herdegen
Vice President, T & D Operations

April 1, 2009

Ms. Colleen M. Dale
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Re: Vegetation Management Annual Report
KCP&L Greater Missouri Operations Company
Case No. EO-2009-0019
(4 CSR 240-23.030)

Dear Ms. Dale:

Pursuant to 4 CSR 240-23.030(4)(C), attached is a copy of KCP&L Greater Missouri Operations Company's Annual Vegetation Management Report.

Please contact me should you have any questions or need any additional information at (816) 556-2407.

Sincerely,

William P. Herdegen III

Kansas City Power & Light Company
2008 Annual Missouri Vegetation Management Report
Pursuant to 4 CSR 240-23.030

KCP&L Greater Missouri Operations Company
2008 Annual Missouri Vegetation Management Report
Pursuant to 4 CSR 240-23.030

TRANSMISSION and DISTRIBUTION RIGHT-OF-WAY VEGETATION MANAGEMENT PROGRAM

April 1 2009

This program document applies to maintenance of vegetation on all overhead Kansas City Power & Light Company's ("KCP&L") and KCP&L Greater Missouri Operations Company's ("GMO") transmission and distribution power lines and meets the requirements of the Missouri Public Service Commission Rule 4 CSR 240-23.030 Electrical Corporation Vegetation Management Standards and Reporting Requirements. KCP&L, by operating agreement, provides vegetation management services to GMO.

April 1 2009

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1.0 Introduction

The purpose of this KCP&L/GMO Transmission and Distribution Vegetation Management Program document is to describe the strategy, key processes, and guidelines necessary to accomplish the orderly, uniform, safe and efficient accomplishment of KCP&L/GMO's objectives relative to the maintenance of vegetation affecting the overhead delivery system. The Program may be modified from time-to-time based on performance as measured by tree-related service reliability, changes in program efficiency, evaluations of customer satisfaction, changes in regulatory requirements, or other program drivers.

2.0 Safety and Reliability

The purpose of KCP&L/GMO's Transmission and Distribution vegetation management programs is to help maintain safe and reliable electric service. Without proper maintenance, trees can become a major cause of service interruptions and can contribute to dangerous conditions such as downed power lines. Vegetation maintenance is also the primary means of complying with the National Electric Safety Code Vegetation Management Section 218 (2007).

All crews performing vegetation management work on or near KCP&L/GMO facilities, rights-of-way (ROW) or easements shall follow approved safety guidelines and procedures. All contractors performing work for KCP&L/GMO shall comply with all applicable governmental safety and health regulations and the safety and health provisions of their respective contract.

All contractors must, at all times, be aware of the nature and characteristics of KCP&L/GMO electric facilities before work begins. Contractors need to understand that electric facilities must remain energized during the performance of work unless special arrangements are made with an authorized KCP&L representative.

3.0 Vegetation Manager

KCP&L employs a vegetation manager to oversee the vegetation management program, to ensure compliance with regulatory requirements including the implementation of the program described in this document.

4.0 Distribution Vegetation Management Program Strategy

4.1. PROGRAM OBJECTIVES

The Distribution Vegetation Management Program objective is to help maintain safe, reliable and least cost electric service, while complying with all regulatory requirements. The Program helps achieve this overall objective by efficiently managing vegetation to reduce outage risk. Left unmanaged, trees and other vegetation can become a leading source of power interruptions during non-storm events and can delay outage restoration associated with major and minor weather events. The Distribution Vegetation Management Program strategy focuses on those maintenance activities that help reduce tree-caused outage risks associated with trees that grow into lines, and affect risks associated with trees that break and fall onto lines.

4.2. MAINTENANCE SCHEDULING STRATEGY

The Distribution Vegetation Management Program maintenance scheduling strategy utilizes time-based maintenance intervals that also consider voltage, historical reliability, the potential for

vegetation to interfere with energized lines, and the relative importance of the line to maintaining safe and reliable service. Different lines are designated with different primary maintenance cycles based on customer density (urban or rural[1]). Mid-cycle line inspections of all primary distribution lines are scheduled to help identify conditions that may require maintenance in advance of the primary cycle. Table 1 lists the applicable cycles for urban and rural circuits in Missouri.

TABLE 1. Missouri Cycle Lengths in Years

Circuit Description	Primary Cycle Length (Years)	Mid-cycle Inspection/selective Tree Maintenance (Years)
Urban Circuits	4	2
Rural Circuits	5 to 6	2 to 3

The primary maintenance cycle will result in 25 percent of total urban distribution miles being maintained annually, and 25 percent of rural distribution miles being maintained at least every 18 months.

4.2.1. Tree Selection Criteria

KCP&L/GMO utilizes a highly prescriptive approach to selection of trees to maintain. Professional utility arborists are assigned to create a work plan designating specific vegetation to be pruned, removed or treated by contract crews. Trees are selected for maintenance based on risk factors and not on fixed distances from conductors. Not every tree exhibiting some risk factors will be selected for pruning or removal, but those trees that are observable, predictable and significant threats to service reliability. General criteria for selection of trees to be maintained includes:

- Potential to cause an interruption through growth into or across energized conductors before the next inspection or the next scheduled trim cycle
- Obvious defects that predispose the tree to failure and damage to electrical facilities
- Existing dead or broken branches hanging over electrical facilities

Factors to be considered include:

- The natural growth rate of the tree
- The expected re-growth rate following pruning of the tree
- The relative wood strength of the tree species and potential for breakage
- Voltage, construction type, conductor spacing and conductor covering
- Legal rights to access the area
- Extent of the defects (decay, splits, weak branch attachments, etc.), customers affected by the line, and potential for tree limbs or trunks to strike primary conductors if they were to break or fall.

[1] Urban circuits are defined as those with customer density equal to or greater than 35 customers per line mile. Rural circuits are defined as those with customer density less than 35 customers per line mile.

- Sag of conductors at elevated temperatures and under wind and ice loading and combined displacement of vegetation, supporting structures, and conductors under adverse weather or routine wind conditions.

Trees affecting secondary service lines are not normally maintained but are the property owner's responsibility. However, trees growing into service lines may be maintained to avoid deflection of these secondary voltage conductors by tree limbs as part of the primary scheduled maintenance cycle.

4.2.2. Tree Removal (trees larger than 4 inches diameter)

Tree removal, together with stump treatment to prevent resprouting, provides permanent clearance, eliminates the potential for removed trees to break and cause damage and reduces future maintenance costs. However, it is neither practical, environmentally desirable, nor welcome by property owners to remove all trees that could affect power lines. Consequently, designation of trees selected for removal is based on cost effectiveness, failure risk and signed permission of the property owner. Trees may be designated for removal if:

- Pruning will result in a significant adverse impact on the health of the tree.
- The tree is a hazard tree that poses an unacceptable risk to overhead lines.
- It is economically advantageous to remove rather than periodically prune the tree.

4.2.3. Hazard Trees

Structurally unsound trees (on or off the easement or ROW) that could fall into electrical conductors should be evaluated for possible removal. Hazard tree conditions could include but are not limited to the following symptoms:

- Dead or dying
- Severe lean
- Weak branches
- Root failure
- Cankers
- Conks (fungal fruiting bodies)
- Internal decay

4.2.4. Brush and Vines (trees smaller than 4 inches diameter)

Removal and/or treatment of brush with herbicides when it is still small can be a cost effective means of reducing future workload and associated maintenance costs before it grows large enough to affect power lines. Brush growing below conductors is designated for removal and stump treatment, mowing and foliar treatment, or individual stem treatment prior to growing to wire height and when it can be cost effectively treated. Vines are selected for cutting and treatment with approved herbicides as they are observed growing on poles and guy wires. Pruning brush should be avoided.

4.2.5. Integrated Vegetation Management (IVM)

KCP&L/GMO utilizes principles of Integrated Vegetation Management (IVM) to control brush on distribution ROW. IVM is an approach that considers the use of mechanical mowing, hand cutting, and herbicide applications, together with the benefits of biological control to manage undesirable woody vegetation on a ROW. The responsible, targeted use of herbicides is an important component of this approach.

Foliar application of herbicides for control of ROW brush on rights-of-ways as well as basal and cut stump methods will be used when most appropriate. Cut stumps should be treated with an

appropriate herbicide mixture to prevent resprouting. Even small diameter brush stumps should be treated unless a follow-up foliar application is definitely scheduled.

In rural locations herbicide application may be scheduled to occur 1 to 2 years in advance of tree maintenance. Any brush stems missed in the herbicide application can be retreated or cut during the tree maintenance cycle. If brush is too tall to control with herbicides and requires hand cutting or mowing, herbicide application should be scheduled approximately one growing season following cutting.

4.3. CONTRACTING STRATEGY

KCP&L/GMO contracts with utility tree maintenance contractors rather than performing vegetation maintenance with its own employees. Multiple contractors are utilized to perform the work through contracts that combine time and equipment with performance-based components.

4.4. CUSTOMER RELATIONS

4.4.1. Customer Inquiries

An appropriate vegetation management individual through personal contact, telephone or letter, responds to customer requests generated through the KCP&L Call Center or other designated source. Requests for tree trimming, removal assistance, or other requests are normally inspected prior to assignment of work to a maintenance crew. Service provided to customers who request assistance with tree removal for the customer's convenience, normally include removal of overhanging branches and all limbs within 10 feet of energized conductors and debris is left at the site of the work.

4.4.2. Property Owner Notification

KCP&L provides notification of pending tree maintenance to affected property owners or occupants. Notification is accomplished through a combination of personal contact, door hangers or mailings at least seven and not more than 90 days prior to performing scheduled maintenance.

4.4.3. County and Municipal Notification

Appropriate municipal and county officials that may be affected by vegetation management activities are notified in writing at least two months in advance of the planned work. This notice includes planned dates and locations of scheduled vegetation maintenance and other information relevant to the particular municipality or county. The primary contact for each municipality or county is the individual selected by mutual agreement between KCP&L/GMO and the highest elected official in the jurisdiction or highest appointed official if there is no elected official.

4.4.4. Public Outreach

KCP&L provides information to the public regarding the vegetation management program and appropriate trees to plant near overhead lines through the website, publications, and community events. At least annually, KCP&L mails information regarding vegetation management to customers throughout the service territory.

4.5. VEGETATION MANAGEMENT PRACTICES

4.5.1. Industry Standards

Vegetation management contractors are required to comply with all federal, state and local laws and regulations, including those of the U.S. Occupational Safety and Health Administration. Vegetation management contractors are also required to follow industry safety standards such as

the American National Standards Institute (ANSI) Z133.1 - 2006 Pruning, Trimming, Repairing, Maintaining, and Removing Trees and Cutting Brush – Safety Requirements, 2006. ANSI A-300 (Part 1) - 2001 Tree, Shrub and Other Woody Plant Maintenance – Standard Practices is a requirement as it applies to utility tree pruning. Contractors are also required to implement the pruning concepts presented in the booklet "Pruning Trees Near Electric Utility Lines" by Dr. Alex L. Shigo.

4.5.2. KCP&L/GMO Vegetation Management Guidelines and Clearance Standards

KCP&L/GMO Vegetation Management Guidelines (Appendix A) are designed to provide guidance to the performance of work by the vegetation management contractors. Included in these guidelines are standards for clearance at the time vegetation is maintained. For conductors energized at 600 to 50,000 volts, the minimum required clearance is 10 feet or clearance to the edge of the ROW, whichever is less. Mature trees whose trunks or limbs have sufficient strength and rigidity to prevent the trunk or limbs from damaging the conductor under reasonably foreseeable wind and weather conditions may be retained within 10 feet of conductors.

4.5.3. Post-Work Inspection and Acceptance

KCP&L implements, as part of a contract management process, inspection of work following completion by vegetation maintenance contractors and prior to final acceptance. This inspection/audit process helps assure acceptable quality and completeness of work performed in accordance with work plans and specifications.

4.6. REPORTS AND RECORD KEEPING

4.6.1. Operational Reporting

Adequate records and reporting are important to effective management of any program. Records shall be maintained of key aspects of the vegetation management program to document program performance and provide information necessary for ongoing program management including:

- Completed work metrics (substation and circuit designation, date worked, crew size, supervisor and type of work performed)
- Cost metrics (cost per mile, cost per circuit, scheduled work, reactive work, etc.)
- Contractor performance (man-hours per unit, miles completed, schedule attainment, etc.)
- Schedule of future work by substation and circuit
- Safety hazards encountered by contractors and OSHA reportable events or accidents

4.6.2. Regulatory Reporting

KCP&L shall prepare an annual report for the Missouri Public Service Commission (MPSC) summarizing the vegetation management program results for the previous year and include a plan for the current year by April 1 of each year, and verified by affidavit of an officer who has knowledge of the matters stated therein. Any changes to be made in the vegetation management standards, guidelines, or standards will be filed at the commission not later than thirty (30) days prior to implementing the change and verified by affidavit of an officer who has knowledge of the matters stated therein. The report shall also include:

- expenditures for vegetation management for the preceding year;
- vegetation management budget for the current year;

- circuits, completion dates and miles trimmed in the preceding year;
- circuits, completion dates and miles scheduled for the current year; and
- total distribution miles for the system and corresponding classification between rural and urban.

KCP&L shall report to the MPSC its own violations of the Electrical Corporation Vegetation Management Standards and Reporting Requirements (4 CSR 240-23.030) within 30 days of discovery and include a plan for correcting the violation.

5.0 Appendices

5.1. APPENDIX A – KCP&L/GMO DISTRIBUTION LINE CLEARANCE GUIDELINES

About This Guideline

The following information is intended as a contractor's guide to the effective implementation of the KCP&L/GMO Distribution Vegetation Management Program. Each tree and tree species has its own unique growth pattern, condition, proximity to conductors, structures and other obstacles, requiring the exercise of professional judgment in implementing the guidelines.

These guidelines apply to vegetation management of the KCP&L/GMO distribution system including voltages from 600 to 35,000 Volts. They are not intended as personal safety guidelines.

(1) Introduction

A copy of these Guidelines and the book "Pruning Trees Near Electric Utility Lines" by Dr. Alex L. Shigo shall be kept on each crew truck/work location.

The Distribution Vegetation Management Program (hereinafter called the "Program") objective is to help maintain safe, reliable and least cost electric service, while complying with all regulatory requirements. The Program helps achieve this overall objective by efficiently managing vegetation to reduce outage risk. Left unmanaged, trees and other vegetation can become a leading source of power interruptions during non-storm events and can delay outage restoration associated with major and minor weather events. The Distribution Vegetation Management Program strategy focuses on those maintenance activities that help reduce tree-caused outage risks associated with trees that grow into lines, and affect risks associated with trees that break and fall onto lines.

The objectives of the Program are to be achieved while maintaining positive customer relations and utilizing sound environmental practices. The Program provides an incentive to the Contractor for exceeding certain production and quality criteria and assesses penalties for failing to maintain certain production and quality criteria. KCP&L, and or its designated representative is responsible for program oversight.

(2) Line Clearance Guidelines

(A) Pruning and Removal Guidelines

All tree pruning shall be governed by approved principles of modern arboriculture and shall adhere to industry standards, including, ANSI A-300 and Z-133 standards and the natural pruning method. KCP&L representatives, in cases, can grant exceptions to these pruning standards where mechanical trimming equipment is used. Pruning shall be done in a manner that protects current tree health and with regard for future growth and development.

(B) Voltages

1. Vegetation management for voltages of (35,000) volts and higher are considered to be Transmission voltages and are deferred to the Transmission Program.
2. Vegetation management for distribution lines energized at 35 kV and below are maintained by the Program. Primary voltages range from 600 to 34,500 Volts, and are further defined as follows: Backbone consists of (3) energized conductors, and Lateral consists of (1) or (2) energized conductors. Conductors with voltages of less than 600 Volts are considered Secondary voltage. The neutral wire has the potential to carry primary voltage, which CONTRACTOR shall take into consideration when clearing primary lines.

(C) Clearance for Primary voltages

1. For primary conductors, radial clearance to be achieved at the time of maintenance is 10 feet.
2. Sub-transmission lines and Backbone lines shall be trimmed vertically to remove overhanging limbs to the widths prescribed in paragraphs (2)(C)1.
3. Any tree affecting or potentially affecting a primary distribution line shall be trimmed to help maintain reliable service. The following factors are considered during the clearance process: The natural growth rate per species; The re-growth rate of the tree species (how fast the branches grow back after pruning), see Section 9 “Tree Re-growth Rates”; The wood strength of the tree species (what is the chance of the branch breaking under the load of strong wind, snow, ice); the voltage conducted by the line (the risk presented by the branch contacting the line; the higher the voltage, the greater the risk); branches rubbing insulated wires and broken or hanging tree branches.
4. The radial clearances in subsection (2)(C) are minimum clearances that should be established between the vegetation and the energized conductors and associated live parts where practicable. Vegetation management practices may make it advantageous to obtain greater clearances than those listed. In the event that the specific trimming conflicts with any other materials within this section, the strictest rules shall apply.
5. Notwithstanding any provision to the contrary in this section (2), mature trees whose trunks or limbs have sufficient strength and rigidity to prevent the trunk or limbs from damaging the conductor under reasonably foreseeable wind and weather conditions are exempt from the minimum clearance requirements in this section (2).
6. Minimum clearances may be subject to limitations of right-of-way width or legal access.
7. All dead wood shall be removed when it is a risk to conductors or when the KCP&L directs the CONTRACTOR to do so.

(D) Clearance considerations for Secondary Conductors, (600) volts or less

1. Open Wire secondary shall be cleared to the same standards as lateral primary conductors.
2. Triplex, street light and service lines shall be cleared only to remove **hard contact**, or deflection of the line’s intended path.
3. All dead wood shall be removed when it is a risk to conductors or when the KCP&L directs the CONTRACTOR to do so.

(E) Clearance considerations for other electrical equipment

1. The neutral wire has the potential to carry primary voltage, which CONTRACTOR shall take into consideration when clearing primary lines.
2. Guy Wires and poles shall be cleared on a case by case basis as determined necessary during field inspection, to free them from weight, strain, or displacement caused by contact with trees.
3. All dead wood shall be removed when it is a risk to conductors or when the KCP&L directs the CONTRACTOR to do so.

(F) Removal Considerations for trees greater than 4” DBH

1. If the amount of tree crown to be removed in order to obtain adequate clearance will have an adverse impact on the overall long term health of the tree, the tree will be considered for removal.
2. Tall-growing trees within the width of the right-of-way shall be considered for removal.
3. Hazard trees that pose a risk to the utilities overhead facilities shall be considered for removal. Hazard tree conditions could include, but are not limited to the following symptoms: Dead or dying, severe lean, weak branches, root failures, cankers, conks or internal decay.
4. All removed trees should be cut as close to the ground as practical and chemically treated to prevent resprouting.
5. Trees where the cost of removing is equal to or less than the cost of trimming shall be considered for removal.

(G) Brush considerations

1. Brush is defined as any tall growing tree that is less than 4” DBH. Brush also includes vines growing on or around KCP&L/GMO’s overhead facilities.
2. Brush that has been planned to be removed shall be basal treated or cut as close to ground level as practical and chemically treated to prevent resprouting.

3. Vines shall be cut off approximately one foot above ground level. All vines shall be treated with herbicides below the cut.
4. Brush (as defined in (2)(G)1) that has been selected for removal and is located within the width of the right-of-way shall be removed and treated.
5. Second growth from stumps cut on previous pruning cycles shall be removed if it has been planned.

(H) Debris disposal

1. Unless specified otherwise, CONTRACTOR shall dispose of all debris resulting from scheduled maintenance work. Wood too large to be chipped shall be cut into fireplace lengths (approximately 18" lengths) and stacked on-site unless the homeowner requests the wood to be removed.
2. CONTRACTOR shall remove all debris produced from scheduled maintenance within 5 business days, unless property owner gives consent to leave debris.
3. Disposal of chips, wood and brush is the responsibility of the contractor.
4. Any debris resulting from outages and/or storms will be left on site.

(I) Herbicide treatment

1. The CONTRACTOR shall provide all necessary herbicide products and comply with applicable Laws regarding the application, storage and handling.
2. The CONTRACTOR shall use the most effective herbicide available for any given situation to prevent regeneration of vegetation and subject to approval by KCP&L. The applicable MSDS shall be submitted as part of the approval process. Herbicides shall be applied according to manufacturer instructions. Consideration must be given to the surrounding vegetation and soil conditions to prevent damage to other growth or surface water or ground water.
3. CONTRACTOR shall warranty herbicide treatment for one (1) year after application and remedy any new growth identified.

(3) Maintenance Cycle

(A) Missouri Maintenance Cycle

1. Urban circuits are defined as circuits with a customer density equal to or greater than 35 customers per line mile.
2. Rural circuits are defined as circuits with customer density less than 35 customers per line mile.
3. Urban circuits, both backbone and lateral, shall be maintained on a four (4) year cycle.
4. Rural circuits, both backbone and lateral, shall be maintained on a five (5) or six (6) year cycle.
5. Urban circuits shall be inspected every two (2) years. Where needed, vegetation maintenance will occur in a timely manner.
6. Rural circuits shall be inspected at least every three (3) years. Where needed, vegetation maintenance will occur in a timely manner.

(4) Outage/Storm Response

(A) On-Call/Call Out

1. In the event of an emergency and when specifically requested by KCP&L, contractors shall provide crews to perform work after hours and on week-ends and holidays, as necessitated by the emergency. Work that is unrelated to the restoration of reliable electric service shall not be performed. On such emergencies, only essential work (i.e. no chipping of brush) shall be done per tree as required to restore electric service rapidly.
2. If necessary a Vegetation Management Supervisor will report to dispatch headquarters to aid in the dispatching of tree crews.
3. Improper pruning during outage/storm response work may occur due to unsafe conditions.
4. Fallen trees, broken limbs and all trimmings and cut vegetation associated with service restoration are left on site. Crews shall not inform customers that KCP&L will return at a later day to clean up the trimmings and cut vegetation.

(5) Customer Request Process

(A) Customer requests

1. Customer requests generated from KCP&L's call center or other designated source are managed by the vegetation management staff. Customer requests can include but are not limited to: Trim for Line Clearance; Customer Assisted Removal; Check for Drop Service; Pick Up Brush.
2. Customer requests will be inspected and the customer will be notified with the specific action that will be taken.
3. Under some circumstances, a customer request may be answered by a standard letter.
4. Response time to customer requests will vary depending on the number of requests in the system and the type of work required.
5. When necessary and with customer consent, brush will be left on-site.
6. For customer requested assistance for tree removal, any tree(s) to be removed by customer will have all overhang removed and ten feet (10') of clearance from all energized conductors will be provided.

(6) Notification Process

(A) Landowner Notification

1. For regularly schedule maintenance, customers will be notified in person or by door card with appropriate contact number, by a KCP&L representative. Questions regarding the scheduled work will be answered at this time. Notice to affected property owners or occupants will occur at least seven (7) days, but not more than ninety (90) days, prior to performing planned vegetation maintenance. Alternative notification methods may include direct mail, postcard or bill insert. KCP&L shall maintain a record of the dates, content, and addresses to which all notices provided were given until the subsequent scheduled vegetation management cycle has occurred for each affected property owner or occupant.
2. KCP&L and or its representative must secure signed permission to remove any tree equal to or greater than 4" DBH.
3. If vegetation management is necessary and the landowner refuses permission, the concern will be addressed by KCP&L and or its representative.
4. The vegetation manager's name and contact information is posted on KCP&L's website and is included on all notifications in the state of Missouri.

(B) Public notification

1. KCP&L shall provide written notice of any pending vegetation management activities to a primary contact for each county and municipality affected. The primary contact shall be selected by mutual agreement between KCP&L and the highest elected official, or if no elected official, then the highest appointed official, of the county and municipality.
2. Notice shall be made in writing to the primary contact designated under subsection above (6)(B)1, at least two (2) months in advance of the planned vegetation management. This notice shall include the planned dates and locations of the vegetation management.

(7) Contractor Guidelines

(A) Appearance and Conduct

All contract line clearance workers shall maintain professional appearance and conduct and shall adhere to the following guidelines. The following guidelines are neither intended to be nor should they be considered to be inclusive. The contractor:

1. shall be courteous to customers at all times;
2. shall not engage in "horseplay" while on the job;
3. shall not use language that is profane, boisterous, derogatory, racial, or of an ethnic nature;

4. shall not display sexually suggestive objects or pictures, such as t-shirts, magazines, calendars or posters;
5. shall not use customers' property (i.e. patios, picnic tables, etc.) for breaks;
6. shall not leave refuse from lunches, etc. on private or public property;
7. shall not enter the customer's house;
8. shall refrain from climbing over or standing on any fence, garage, tool shed, etc. unless absolutely necessary to access work and only when it can be done safely and without damaging customers' property;
9. shall not solicit private work, including tree work, while performing work pursuant to this Contract;
10. shall not obligate KCP&L/GMO to make any payments to another party, nor make any promises or representations of any nature to another party for or on behalf of KCP&L/GMO;
11. shall maintain neat appearance at all times and;
12. shall wear clothing and hard hat displaying CONTRACTOR's color and/or emblem.

(B) Supervision

1. The CONTRACTOR shall ensure that it has adequate supervisory personnel on the property to ensure that all of the CONTRACTOR's crews on the property are properly supervised. CONTRACTOR's personnel shall provide the interaction and communication with KCP&L as required by this Contract. Such supervisory personnel shall be called "General Foremen" in these guidelines.
2. All contract supervisors and General Foreman will be Certified Arborists through the International Society of Arboriculture (ISA). Employees currently in these positions will have six months to obtain the certification; newly assigned supervisors and general foreman shall obtain their certification within twelve months.

(C) Identification

All General Foreman and Crew Forman shall possess identification stating employee name, employer, as well as documentation stating the contractor is providing vegetation management services for KCP&L.

(D) Employment expectations

1. CONTRACTOR shall conduct pre-employment and random drug and alcohol screening to detect the presence of amphetamines, cocaine, marijuana, opiates, and phencyclidine, at no additional cost to KCP&L/GMO.
2. CONTRACTOR shall conduct pre-employment background check for felony criminal convictions and motor vehicle violations for all states of residency within the past five (5) years, at no additional cost to KCP&L/GMO.

(E) Vehicles

1. All vehicles and equipment shall be in good working condition, kept clean and organized at all times, maintaining a professional appearance. All trucks shall clearly display CONTRACTOR markings and vehicle numbers. Truck numbering should be visible from both side and the back. Also, the numbering should be large enough to be legible from a distance commonly encountered in traffic, i.e., several car lengths or across a four-lane intersection.
2. Each General Foreman and Crew shall be equipped with a two-way communication device at no additional cost to KCP&L/GMO. If radios are supplied by KCP&L, the contractor will replace all lost or stolen radios.
3. Cones will be placed at a highly visible area (street intersections, driveways, alleys, etc.) when a crew's work location is not readily detectable.

(F) Time Fulfillment

1. All work shall be performed Monday through Friday, except under special circumstances as agreed by KCP&L. The CONTRACTOR and KCP&L shall mutually agree to the working hours in accordance to IBEW local 53. Any approved overtime shall be paid at the rates set forth in contract, depending on the circumstances, by KCP&L for any work performed in excess of 40 hours per week.
2. While on **stand-by**, crew(s) shall be dumping chips, fueling trucks, maintaining chainsaws, and engaging in other productive duties. *Crews sitting for the **2-hour show up time** shall not charge time towards their perspective equipment*.

3. Holidays - CONTRACTOR may, upon receipt of permission from KCP&L, work at straight time on any KCP&L-observed holiday.

(G) Certification and permits

The CONTRACTOR shall acquire all certifications and permits required by local, county, municipality, state, tribal and federal agencies in which the CONTRACTOR's crews will be performing work pursuant to this Contract.

(H) Refusal/Access

1. In the event that the CONTRACTOR encounters conditions prohibiting performance of Work, the crew foreman will make, and document on Work Log, all reasonable efforts to secure access. CONTRACTOR shall notify KCP&L after all reasonable efforts to secure access have failed. A locked gate shall not, in and of itself, constitute “No Access”. CONTRACTOR shall not be entitled to additional compensation for No Access.
2. In the event that a property owner refuses access to the work scheduled, the crew foreman will notify KCP&L and move on to the next job site. Work will not be performed until KCP&L has notified the CONTRACTOR that access has been granted.

(I) Reporting

The CONTRACTOR shall collect and report key aspects of the vegetation management program to document program performance and provide information necessary for ongoing program management including:

1. CONTRACTOR Weekly Work Log
2. Weekly TRES timesheets
3. Daily Crew Locations
4. A record of any safety hazards encountered
5. Any unexpected occurrence or accident resulting in death, life-threatening or serious injury to a person assigned to perform vegetation management activities or the public.
6. Additional documentation as requested by KCP&L

(J) Contact information

KCP&L and the CONTRACTOR shall provide each other as needed, a list of all Vegetation Management personnel, and the phone numbers where each can be contacted, including pagers/beepers/cell phones.

(K) Communication

During the progress of the work, CONTRACTOR shall provide crew locations to KCP&L staff as requested. In the event the CONTRACTOR plans to deviate from the normal work schedule, e.g. leaving the job site or starting location due to inclement weather or other cause, the foreman shall notify the appropriate personnel immediately.

(L) System Awareness

1. The CONTRACTOR shall at all times be aware of the nature and characteristics of the electric facilities, including circuit voltage. It is understood that all circuits shall remain energized during the performance of work. Any exceptions must be authorized and scheduled by KCP&L. If in the judgment of the Contractor’s general foreman/supervisor, it is hazardous to prune or remove trees with the circuits energized, the Contractor must contact an authorized KCP&L representative. If appropriate KCP&L will provide the necessary protective materials or de-energize circuits to ensure the safe pruning or removal of the tree(s).
2. Should the Contractor knock down or come into contact with conductors (power lines), the Contractor shall immediately notify KCP&L and take the necessary protective measures. All Contractor-caused electric service interruptions are subject to repair at the Contractor’s expense. This includes any damage to customers’ property, including any electrical damage.

3. In the event a Contractor becomes aware of any broken, damaged, loose or faulty line facilities in the normal course of its line clearance performance, the Contractor shall promptly notify KCP&L as to the exact location(s) and nature of the condition found.
4. The CONTRACTOR's Representative (i.e. Regional Manager or designated representative) and General Foreman shall attend meetings as scheduled by KCP&L to discuss work practices and issues.

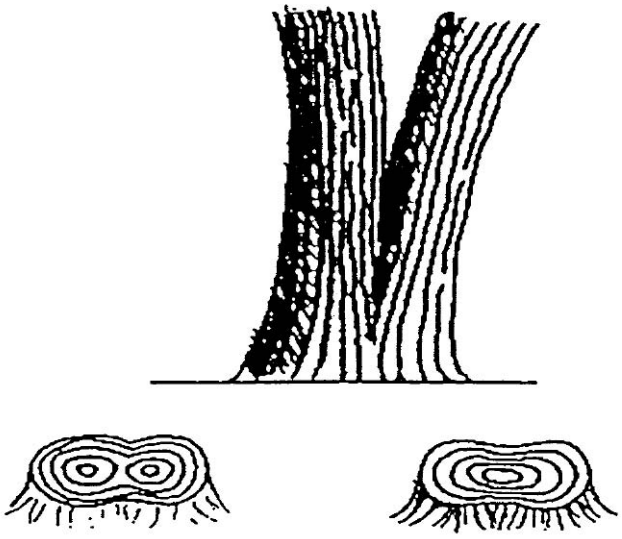
(M) Expectations

1. CONTRACTOR shall insure that crew's are being productive at all times.
2. CONTRACTOR shall perform Work as identified by KCP&L. The CONTRACTOR shall only accept work assignments from KCP&L's designated representative. The CONTRACTOR shall make an attempt to contact the homeowner at each property they have planned work.

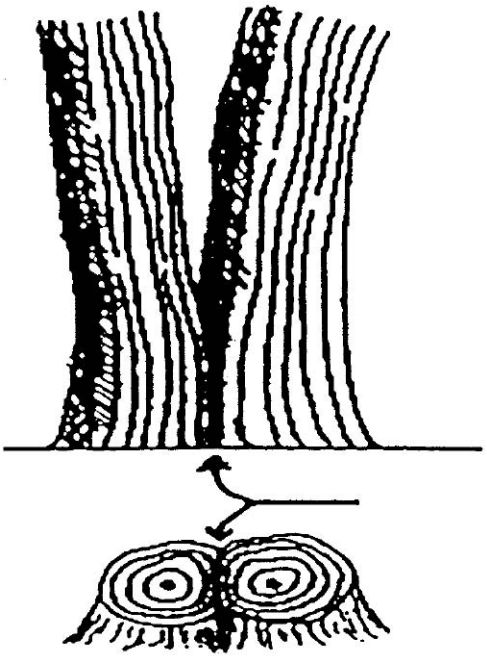
(8) Definitions

basal treatment - Herbicide application covering the entire stem to approximately 18 inches above the soil
brush - a woody plant that is less than 4 inches DBH, that is not part of an existing tree, and that may reach the conductor at maturity.
brush work – trimming, clearing brush and applying a herbicide to the cut stems, or only applying herbicide to brush.
clearance - the distance between vegetation and the conductors.
coniferous - any of the cone-bearing trees or shrubs, mostly evergreens.
DBH - "diameter at breast height" – the diameter of individual tree trunks or individual stems of brush measured at a point 4.5 feet above the ground.
deciduous - any perennial plant that sheds its leaves annually at the end of a growing season.
demand tree trimming - trimming or removing trees on a customer requested or emergency basis. Also may include tree work associated with line construction projects. This is typically required when trees have grown into the conductors, or are close to the conductors, and have created a potentially dangerous situation. This may also include special trimming or chipping work when requested by the Utility. Customer requested only Utility authorized representatives may assign demand tree work.
directional pruning - a form of natural pruning used to encourage tree regrowth away from the conductor. It is accomplished by removing limbs growing toward the conductors entirely at the branch collar near the trunk of the tree, or by pruning to lateral branches that are at least one-third the diameter of the limb being cut and are growing away from the conductor.
drop-crotching - is a crown reduction technique in which a tree trimmer makes proper pruning cuts at crotches, removing the larger limb and favoring the smaller. For electric line clearance, the trimmer would remove limbs growing toward the conductors and favor those growing away from the conductors. This usually results in a "V" shaped appearance of the tree crown and is frequently referred to as "V-trimming". See definition of "natural pruning" for further description.
evergreen - any plant that retains its leaves/needles year-round.
foliar herbicide application - the application of a herbicide to the leaves or needles of a target plant.
hazard trees - trees that are located off the right of way, have a high probability for failure and are of sufficient height to contact the conductors and/or structures and guy wires if they were to fall in that direction, and should be cleared. Conditions could include but are not limited to the following: Dead, dying or diseased, leaning trees, weak branches, shallow root system, root failure, internal decay, canker or canker root.
herbicide - a chemical pesticide used to control, suppress, or kill plants.
natural pruning - a method by which branches are cut to the branch collar at a suitable parent limb, the trunk of the tree, or an appropriately sized lateral branch. This method of pruning is sometimes called "drop-crotching", "proper pruning", the "Shigo method" or "lateral trimming."
preventative maintenance - trimming or removing vegetation on a systematic basis typically by, but not limited to, circuit or grid, and in a manner intended to achieve system reliability.
pruning - the removal of dead, dying, diseased, interfering, objectionable, and/or weak branches of trees or shrubs using proper arboricultural techniques.
removal - completely removing an entire tree as close as practical to ground level and applying herbicide to the cut stump when appropriate.

right-of-way - a transmission or distribution right-of-way, an easement, a utility easement, or any other corridor of land paralleling, on both sides, an overhead transmission or distribution line, and in respect of which the Utility has certain rights.
rounding over - the making of many small cuts so that a tree underneath the conductors is rounded over in a uniform curve. This creates an unhealthy tree condition and results in rapid regrowth directly back toward the electrical conductors. This is not an acceptable practice.
safety zone work – removing all overhang and cutting back limbs to a minimum clearance of 10 feet from the energized conductor.
selective herbicide - a herbicide that, when applied to a mixed population of plants, will control specific species without injury to others.
shearing - the making of many small cuts so that a tree adjacent to the conductors is sheared in a uniform line. This is not a generally acceptable practice.
show-up site – site where CONTRACTOR crews receive work assignments.
side pruning - using natural pruning methods to cut back or removing side branches that are threatening the conductors; required where trees are growing adjacent to conductors.
stump treatment - applying an approved herbicide to the outer ring (cambium) portion of the stump to reduce or eliminate re-growth.
sucker growth - the re-growth within the tree that originates near the cuts made during the previous trimming.
the property - any work site associated with this contract.
topping - cutting back the upper crown of a tree to a uniform horizontal line, leaving multiple stubs. This is an improper and unacceptable trimming technique.
tree - a perennial plant with a woody trunk measuring at least four (4) inches DBH, and having one set of annual rings at ground level or more than one set of annual rings not separated by included bark. Trees that grow adjacent to one another and share an apparent common base completely separated by "included bark" are considered to be distinct trees. "Included bark" is bark that is included within the wood of a tree, or between the woody stems of separate trees, creating a physical separation between the trees.
single tree- a tree that splits above the ground line and has no visible included bark seam down to the ground line.



multiple trees- Any tree that splits at the ground line or any tree that splits above the ground line but has a visible included bark seam down to the ground line.



tree size classifications - tree diameter as measured at breast height (DBH):
4” to 8”, 8” to 12”, 12” to 24”, 24” and greater
tree crown - the upper portion of the tree; the branches or leaf area.
trimming - cutting back tree branches or shrubs to shape or reduce the size of the tree or shrub.
V-trim - using natural pruning methods to cut back large portions of the upper crown of a tree. This is required when trees are located directly beneath a conductor. Also known as crown reduction pruning or drop crotching.
vegetation - all the plant (flora) life in a particular region. A plant community, assemblage, or aggregation with distinguishable characteristics

(9) Tree Re-growth Rates

Average Annual Re-growth Rates For Individual Species on the KCP&L/GMO Distribution System.

Species	Pruning Type	Inches of Re-growth by Age of Sprout					
		1 Yr.	2 Yr.	3 Yr.	4 Yr.	5 Yr.	6 Yr.
Silver Maple	Side	55	67	84	101	118	135
	Top	71	92	113	134	155	176
Hackberry	Side	36	56	78	87	100	104
	Top	53	81	104	120	140	161
Ash	Side	33	63	84	98	115	132
	Top	26	61	88	118	134	161
Honeylocust	Side	36	68	91	115	135	162
	Top	48	81	115	128	147	173
Black Walnut	Side	43	71	87	103	119	130
	Top	69	103	144	166	183	212
Eastern Redcedar	Side	7	11	17	22	27	34
	Top	17	29	41	53	65	79
Osage-Orange	Side	67	89	111	133	155	177
	Top	81	105	129	153	177	201
Mulberry	Side	28	50	75	86	126	141
	Top	52	96	129	163	202	241
Scotch Pine	Side	12	22	29	37	46	54
	Top	13	25	35	44	53	59
Sycamore	Side	71	112	137	158	176	194
	Top	26	96	132	176	225	275
Eastern Cottonwood	Side	48	80	101	128	160	192
	Top	67	105	147	176	196	209
Shingle Oak	Side	43	57	71	87	94	103
	Top	17	36	54	66	77	88
Pin Oak	Side	27	45	57	68	82	91
	Top	30	59	80	94	106	126
Elm	Side	50	83	111	133	152	203
	Top	53	93	124	158	193	226

5.2. APPENDIX B – 2008 DISTRIBUTION VEGETATION MANAGEMENT BUDGET AND SCHEDULE PERFORMANCE

Summary
KCP&L manages vegetation through an Integrated Vegetation Management (IVM) program. IVM includes, but is not limited to: manual, mechanical techniques, biological, chemical and cultural control. Standard crew sizes are 3 workers on a manual crew and 2 workers on a bucket crew. Safety hazards may be encountered daily thereby requiring our contractor's certified line clearance trimmer to assess and take proactive measure(s) to safely clear limbs from power lines.

Additional details and data to support the practices and activities performed in 2008 are available upon request.

Expenditures - 2008
2008 distribution vegetation management expenditures for KCP&L-MO were $6,758,911; for GMO were $8,430,000; and for KCP&L/GMO were $15,188,911.

Vegetation Mileage - 2008
The following table summarizes the Missouri distribution vegetation management activities performed in 2008 for KCP&L/GMO.

Company	Circuit	Classification	Miles	Completion Date
KCP&L	1142	Urban	2.00	11/1/2008
KCP&L	1521	Urban	0.28	3/29/2008
KCP&L	2301	Urban	4.15	5/17/2008
KCP&L	2303	Urban	2.25	8/30/2008
KCP&L	2333	Urban	10.77	8/2/2008
KCP&L	2334	Urban	4.25	11/22/2008
KCP&L	2335	Urban	1.57	3/29/2008
KCP&L	2342	Urban	7.09	9/13/2008
KCP&L	2344	Urban	1.25	7/12/2008
KCP&L	2373	Urban	6.38	11/22/2008
KCP&L	2374	Urban	2.60	10/18/2008
KCP&L	2392	Urban	1.80	3/15/2008
KCP&L	2393	Urban	0.05	11/22/2008
KCP&L	2394	Urban	7.33	4/12/2008
KCP&L	2422	Urban	3.10	6/28/2008
KCP&L	2511	Rural	54.51	6/28/2008
KCP&L	2724	Urban	3.89	7/5/2008
KCP&L	2732	Urban	11.38	9/13/2008
KCP&L	2734	Urban	1.75	11/15/2008
KCP&L	2743	Urban	3.00	9/13/2008
KCP&L	2752	Urban	4.48	2/2/2008
KCP&L	2761	Rural	1.52	8/16/2008
KCP&L	2762	Urban	4.76	10/11/2008
KCP&L	3122	Urban	1.74	11/1/2008

KCP&L	3123	Urban	1.25	5/3/2008
KCP&L	3151	Urban	7.37	9/20/2008
KCP&L	3511	Urban	4.62	7/19/2008
KCP&L	3513	Urban	3.74	8/2/2008
KCP&L	3532	Urban	1.25	11/22/2008
KCP&L	3542	Urban	0.50	11/8/2008
KCP&L	3544	Urban	12.06	8/2/2008
KCP&L	3913	Urban	0.78	1/19/2008
KCP&L	4311	Rural	31.18	11/15/2008
KCP&L	4943	Urban	25.64	11/1/2008
KCP&L	4952	Urban	6.65	5/17/2008
KCP&L	4961	Urban	1.86	5/31/2008
KCP&L	4962	Urban	5.01	11/1/2008
KCP&L	5261	Urban	5.00	3/15/2008
KCP&L	5263	Urban	3.00	5/3/2008
KCP&L	5338	Urban	2.95	11/1/2008
KCP&L	5371	Urban	8.75	9/6/2008
KCP&L	5373	Rural	2.79	6/28/2008
KCP&L	5381	Urban	3.44	7/26/2008
KCP&L	5382	Rural	4.00	8/30/2008
KCP&L	5383	Urban	8.50	9/13/2008
KCP&L	5384	Rural	0.10	1/5/2008
KCP&L	5712	Urban	8.87	9/6/2008
KCP&L	6011	Rural	93.42	3/29/2008
KCP&L	6111	Urban	1.85	11/22/2008
KCP&L	6122	Urban	11.54	6/7/2008
KCP&L	6131	Urban	7.68	4/5/2008
KCP&L	6144	Urban	1.80	2/9/2008
KCP&L	6151	Urban	2.89	5/10/2008
KCP&L	6153	Urban	9.07	4/5/2008
KCP&L	6163	Urban	0.50	2/9/2008
KCP&L	6164	Urban	10.81	11/22/2008
KCP&L	6331	Urban	9.13	5/3/2008
KCP&L	7143	Rural	0.56	4/26/2008
KCP&L	7411	Urban	3.26	8/30/2008
KCP&L	7413	Urban	0.69	1/12/2008
KCP&L	7421	Rural	3.96	5/31/2008
KCP&L	7492	Urban	7.01	11/1/2008
KCP&L	7511	Urban	2.25	6/21/2008
KCP&L	7544	Urban	0.64	4/5/2008
KCP&L	7811	Urban	8.39	10/25/2008
KCP&L	7813	Urban	4.14	11/1/2008
KCP&L	7821	Urban	0.58	9/13/2008
KCP&L	7831	Urban	0.56	11/22/2008
KCP&L	7832	Urban	2.74	8/16/2008
KCP&L	7861	Urban	5.12	5/17/2008
KCP&L	9842	Urban	2.07	9/13/2008
KCP&L	11801	Urban	4.65	3/29/2008

MPS	014-507	Urban	39.58	11/1/2008
MPS	014-524	Rural	126.48	11/1/2008
MPS	038-502	Urban	0.36	8/9/2008
MPS	202-501	Rural	34.76	3/14/2008
MPS	202-503	Rural	13.19	3/14/2008
MPS	252-501	Urban	7.86	3/21/2008
MPS	252-502	Urban	11.35	3/21/2008
MPS	267-507	Urban	14.11	2/28/2008
MPS	267-508	Urban	13.30	5/1/2008
MPS	282-501	Rural	26.48	9/27/2008
MPS	291-504	Rural	37.07	10/11/2008
MPS	291-505	Rural	11.04	10/4/2008
MPS	371-502	Urban	2.60	8/2/2008
MPS	371-504	Urban	6.83	10/4/2008
MPS	371-509	Urban	5.60	11/1/2008
MPS	378-501	Urban	17.80	11/22/2008
MPS	378-502	Rural	20.82	11/8/2008
MPS	38-502	Urban	12.78	8/8/2008
MPS	38-5511	Urban	18.71	6/29/2008
MPS	38-5522	Rural	9.00	7/8/2008
MPS	38-5533	Urban	3.25	4/15/2008
MPS	38-5544	Urban	7.22	6/1/2008
MPS	38-5555	Urban	8.88	4/15/2008
MPS	406-501	Urban	11.55	10/4/2008
MPS	418-501	Urban	7.13	5/1/2008
MPS	418-502	Urban	14.32	7/1/2008
MPS	418-507	Urban	5.82	7/1/2008
MPS	418-508	Urban	7.63	7/1/2008
MPS	422-513	Rural	31.65	11/22/2008
MPS	426-502	Urban	6.54	11/8/2008
MPS	426-503	Urban	8.56	10/11/2008
MPS	480-503	Urban	12.46	10/18/2008
MPS	512-34k	Urban	40.50	11/15/2008
MPS	550-501	Rural	59.31	11/15/2008
MPS	550-502	Rural	22.54	9/6/2008
MPS	550-503	Rural	10.71	8/9/2008
MPS	550-504	Rural	9.30	11/22/2008
MPS	553-503	Rural	1.13	9/13/2008
MPS	553-504	Rural	6.28	11/22/2008
MPS	553-505	Rural	75.03	11/22/2008
MPS	553-506	Rural	12.40	10/4/2008
MPS	563-65	Rural	51.01	11/8/2008
MPS	563-66	Rural	21.41	11/1/2008
MPS	582-501	Urban	11.67	11/1/2008
MPS	582-502	Rural	11.31	8/16/2008
MPS	595-502	Rural	18.62	11/22/2008
MPS	658-503	Rural	22.85	9/27/2008
MPS	683-508	Urban	6.07	9/13/2008

MPS	702-502	Urban	12.75	7/19/2008
MPS	702-503	Urban	16.59	5/1/2008
MPS	702-504	Urban	15.48	3/28/2008
MPS	702-506	Urban	16.68	9/27/2008
MPS	702-507	Urban	13.13	9/13/2008
MPS	702-508	Urban	18.12	9/13/2008
MPS	729-504	Rural	49.97	11/22/2008
MPS	729-509	Rural	115.10	7/8/2008
MPS	764-502	Rural	26.80	8/23/2008
MPS	764-503	Urban	16.22	8/9/2008
MPS	764-506	Urban	10.80	8/23/2008
MPS	764-521	Urban	12.27	8/9/2008
MPS	764-554	Urban	26.76	8/23/2008
MPS	820-501	Urban	16.05	9/20/2008
MPS	820-502	Rural	48.70	11/1/2008
MPS	823-502	Rural	1.50	9/6/2008
MPS	830-507	Urban	3.90	9/27/2008
MPS	830-508	Urban	8.81	8/30/2008
MPS	838-502	Urban	13.19	3/8/2008
MPS	838-503	Urban	2.58	3/8/2008
MPS	859-501	Rural	14.41	4/11/2008
MPS	859-502	Rural	23.00	8/2/2008
MPS	859-503	Rural	21.67	11/15/2008
MPS	859-507	Rural	0.41	11/22/2008
MPS	862-503	Urban	13.96	11/1/2008
SJLP	34.5 kV	Urban	95.55	11/22/2008
SJLP	501-14	Urban	3.89	5/5/2008
SJLP	501-15	Urban	4.77	6/14/2008
SJLP	552-50	Rural	3.46	4/28/2008
SJLP	552-56	Rural	2.28	4/16/2008
SJLP	553-CK113	Urban	8.33	9/20/2008
SJLP	553-CK19	Urban	21.40	7/19/2008
SJLP	565-46	Urban	8.33	3/1/2008
SJLP	565-47	Urban	10.03	2/21/2008
SJLP	565-48	Urban	8.25	2/1/2008
SJLP	565-49	Urban	10.49	1/3/2008
SJLP	570-61	Urban	1.96	5/6/2008
SJLP	570-64	Urban	1.72	5/1/2008
SJLP	601-GC135	Rural	15.01	10/11/2008
SJLP	601-GC136	Rural	11.21	9/13/2008
SJLP	608-140	Rural	9.64	11/15/2008
SJLP	608-PK140	Rural	13.41	11/1/2008
SJLP	632-FX160	Rural	84.41	7/26/2008
SJLP	828-501	Rural	1.36	9/13/2008
Total 2008 Miles			2,255.74	

2008 Mileage Completion Summary

	Urban	Rural	Total 12 kV	34 kV
KCP&L-MO	294.48	192.04	486.52	0
GMO	598.94	1,074.73	1,673.67	95.55
Total	893.42	1,266.77	2,160.19	95.55

Missouri Distribution Miles

	Urban	Rural	Total 12 kV	34 kV
KCP&L-MO	1,989.75	1,860.63	3,850.38	158.75
GMO	2,593.82	5,102.95	7,696.77	453.2
Total	4,583.57	6,963.58	11,547.15	611.95

5.3. APPENDIX C – 2009 DISTRIBUTION VEGETATION MANAGEMENT BUDGET AND SCHEDULE

Budget – 2009
The 2009 Missouri distribution vegetation management budget for KCP&L is $8,904,998; for GMO is $9,630,678; and for KCP&L/GMO is $18,535,676.

Workplan - 2009
The following table summarizes the scheduled 2009 Missouri distribution vegetation management activities.

Company	Circuit	Classification	Name	Miles
KCPL	627	Urban		0.59
KCPL	628	Urban		0.82
KCPL	1111	Urban		3.74
KCPL	1114	Urban		5.76
KCPL	1142	Urban		3.53
KCPL	1576	Urban		0.12
KCPL	2334	Urban		7.52
KCPL	2343	Urban		8.00
KCPL	2354	Urban		6.45
KCPL	2355	Urban		5.64
KCPL	2372	Urban		15.26
KCPL	2373	Urban		1.65
KCPL	2374	Urban		5.68
KCPL	2442	Urban		3.41
KCPL	2713	Urban		0.09
KCPL	2721	Urban		7.37
KCPL	2732	Urban		5.38
KCPL	2734	Urban		0.33
KCPL	2741	Urban		17.55
KCPL	2743	Urban		0.50
KCPL	3011	Urban		12.28
KCPL	3021	Urban		11.51
KCPL	3122	Urban		9.32
KCPL	3132	Urban		18.75
KCPL	3142	Urban		0.99
KCPL	3144	Urban		7.76
KCPL	3152	Urban		11.45
KCPL	3153	Urban		6.72
KCPL	3212	Rural		0.90
KCPL	3213	Rural		18.61
KCPL	3513	Urban		11.36
KCPL	3532	Urban		10.98
KCPL	3542	Urban		15.23
KCPL	3543	Urban		1.47

KCPL	3552	Urban		16.56
KCPL	3553	Urban		0.37
KCPL	3711	Urban		5.03
KCPL	4221	Rural		140.90
KCPL	4222	Rural		0.20
KCPL	4311	Rural		2.18
KCPL	4852	Urban		1.11
KCPL	4854	Urban		2.98
KCPL	4912	Urban		19.77
KCPL	4953	Urban		8.46
KCPL	4962	Urban		19.34
KCPL	5261	Urban		9.68
KCPL	5263	Urban		13.36
KCPL	5337	Urban		9.80
KCPL	5338	Urban		1.37
KCPL	5371	Urban		9.94
KCPL	5382	Rural		8.28
KCPL	5383	Urban		2.75
KCPL	5612	Urban		9.58
KCPL	5614	Urban		7.50
KCPL	6111	Urban		15.07
KCPL	6112	Urban		16.91
KCPL	6113	Urban		19.01
KCPL	6123	Urban		15.84
KCPL	6132	Urban		7.74
KCPL	6151	Urban		2.16
KCPL	6152	Urban		14.25
KCPL	6163	Urban		8.89
KCPL	6311	Urban		5.11
KCPL	6341	Urban		15.95
KCPL	7402	Urban		1.74
KCPL	7404	Urban		4.13
KCPL	7414	Urban		7.09
KCPL	7453	Urban		8.50
KCPL	7491	Urban		9.32
KCPL	7494	Urban		6.40
KCPL	7514	Urban		0.78
KCPL	7522	Urban		0.85
KCPL	7542	Urban		6.41
KCPL	7561	Urban		6.52
KCPL	7573	Urban		5.74
KCPL	7582	Urban		7.56
KCPL	7584	Urban		0.99
KCPL	7811	Urban		1.00
KCPL	7812	Urban		8.81
KCPL	7831	Urban		13.63

KCPL	7832	Urban		7.28
KCPL	7834	Urban		1.99
KCPL	7841	Urban		11.36
KCPL	7843	Urban		1.45
KCPL	7851	Urban		9.66
KCPL	7852	Urban		9.53
KCPL	7863	Urban		11.69
KCPL	8613	Urban		15.67
KCPL	9412	Urban		0.33
KCPL	9841	Urban		16.52
KCPL	10431	Rural		75.07
KCPL	12212	Rural		0.96
MPS	014-507	Urban	Adrian Fdr. #507	2.08
MPS	014-524	Rural	Adrian Fdr. #524	22.32
MPS	018-501	Rural	Appleton City Fdr. # 503	28.61
MPS	018-503	Rural	Appleton City Fdr. # 502	18.41
MPS	036-503	Urban	Belton City Fdr. #503	1.36
MPS	062-502	Urban	Blue Springs West Fdr. #502	7.76
MPS	062-503	Urban	Blue Springs West Fdr. #503	13.04
MPS	062-507	Urban	Blue Springs West Fdr. #507	8.01
MPS	062-508	Urban	Blue Springs West Fdr. #508	10.42
MPS	064-502	Urban	Blue Springs East Fdr. #502	15.23
MPS	064-503	Urban	Blue Springs East Fdr. #503	3.83
MPS	064-504	Urban	Blue Springs East Fdr. #504	3.14
MPS	064-5553	Urban	Blue Springs East Fdr. #5553	13.66
MPS	064-5577	Urban	Blue Springs East Fdr. #5577	3.42
MPS	064-5578	Urban	Blue Springs East Fdr. #5578	3.66
MPS	065-502	Urban	Blue Springs South Fdr. #502	4.97
MPS	176-501	Urban	Concordia 4 Kv Fdr. # 501	3.15
MPS	176-502	Urban	Concordia 4 Kv Fdr. # 502	3.36
MPS	176-503	Urban	Concordia 4 Kv Fdr. # 503	1.47
MPS	213-501	Rural	Elm Fdr. #501	52.78
MPS	213-502	Rural	Elm Fdr. #502	14.36
MPS	216-501	Rural	Ferrelview 161/24.9 kV Fdr. #501	8.82
MPS	216-502	Rural	Ferrelview 161/24.9 kV Fdr. #502	16.16
MPS	216-503	Urban	Ferrelview 161/24.9 kV Fdr. #503	11.42
MPS	216-504	Rural	Ferrelview 161/24.9 kV Fdr. #504	0.88
MPS	234-501	Rural	Freeman Fdr. #501	11.76
MPS	234-502	Urban	Freeman Fdr. #502	5.53
MPS	264-502	Urban	Grain Valley Fdr. # 502	4.69
MPS	264-503	Urban	Grain Valley Fdr. # 503	43.89
MPS	302-501	Rural	Harrisonville West Fdr. #501	7.72
MPS	302-502	Rural	Harrisonville West Fdr. #502	40.92
MPS	308-502	Rural	Harrisonville Lake North Fdr. 502	4.38
MPS	308-503	Rural	Harrisonville Lake North Fdr. 503	33.35
MPS	336-501	Urban	Holden Fdr. #501	10.89

MPS	336-502	Urban	Holden Fdr. #502	8.29
MPS	336-503	Urban	Holden Fdr. #503	13.25
MPS	337-502	Urban	Hook Road Fdr. #502	4.99
MPS	337-503	Rural	Hook Road Fdr. #503	3.12
MPS	337-507	Urban	Hook Road Fdr. #507	15.00
MPS	337-509	Urban	Hook Road Fdr. #509	24.09
MPS	371-502	Urban	Kansas City South Fdr. #502	0.65
MPS	415-501	Rural	Laredo Fdr. #501	63.64
MPS	422-502	Urban	Lee's Summit East Fdr. #502	11.16
MPS	422-503	Urban	Lee's Summit East Fdr. #503	5.32
MPS	422-505	Urban	Leeis Summit East Fdr. #505	2.45
MPS	422-507	Urban	Lee's Summit East Fdr. #507	6.75
MPS	422-510	Urban	Lee's Summit East Fdr. #510	7.23
MPS	422-513	Rural	Lee's Summit East Fdr. #513	3.96
MPS	426-504	Urban	Longview Fdr. #504	8.57
MPS	426-5505	Urban	Longview Fdr. #5505	9.56
MPS	426-5510	Urban	Longview Fdr. #5510	10.76
MPS	456-501	Rural	Liberal Fdr. #501	26.01
MPS	456-502	Rural	Liberal Fdr. #502	4.58
MPS	474-502	Urban	Moss Street Fdr. #502	1.07
MPS	474-553	Urban	Moss Street Fdr. #553	4.74
MPS	474-584	Urban	Moss Street Fdr. #584	7.75
MPS	474-592	Urban	Moss Street Fdr. #592	12.12
MPS	480-503	Urban	Liberty South Fdr. #503	4.15
MPS	504-501	Rural	Lowry City Fdr. #501	5.79
MPS	504-502	Rural	Lowry City Fdr. #502	7.01
MPS	534-501	Rural	Montrose Fdr. #501	11.56
MPS	550-504	Urban	Nevada Plant Fdr. #504	1.03
MPS	553-504	Urban	Nevada 3M Fdr. #504	8.00
MPS	595-502	Rural	Orrick Fdr. #502	12.41
MPS	658-503	Urban	Platte City Fdr. #503	34.27
MPS	678-7702	Urban	Power Coal Fdr. #7702	0.01
MPS	689-502	Urban	Raymore Fdr. #502	12.70
MPS	689-503	Urban	Raymore Fdr. #503	21.06
MPS	729-503	Rural	Richmond Fdr. #503	5.09
MPS	729-504	Rural	Richmond Fdr. #504	62.48
MPS	819-501	Rural	Sheldon Fdr. #501	52.02
MPS	819-502	Rural	Sheldon Fdr. #502	12.22
MPS	820-502	Rural	Sibley Fdr. #502	31.28
MPS	830-503	Urban	Staley Road Fdr. #503	3.90
MPS	830-507	Urban	Staley Road Fdr. #507	0.60
MPS	830-508	Urban	Staley Road Fdr. #508	3.90
MPS	859-503	Rural	Trenton (NW) Fdr. #503	2.41
MPS	859-507	Rural	Trenton (NW) Fdr. #507	7.88
MPS	862-503	Urban	Turner Road Fdr. #503	6.04
MPS	888-506	Urban	Warrensburg Plant Fdr. #506	28.11

MPS	902-501	Urban	Warsaw 69 kV Fdr. #501	23.80
MPS	902-503	Urban	Warsaw 69 kV Fdr. #503	19.35
MPS	902-505	Rural	Warsaw 69 kV Fdr. #505	17.03
SJLP	503-ES111	Urban	East Side Fdr. #111	7.26
SJLP	503-ES113	Urban	East Side Fdr. #113	9.73
SJLP	503-ES114	Urban	East Side Fdr. #114	7.51
SJLP	503-ES115	Urban	East Side Fdr. #115	17.08
SJLP	503-ES31	Rural	East Side Fdr. #31	36.96
SJLP	553-CK113	Urban	Cook Fdr. #113	8.33
SJLP	553-CK114	Rural	Cook Fdr. #114	65.96
SJLP	556-22	Urban	Oak Street Fdr. #22	6.63
SJLP	556-23	Rural	Oak Street Fdr. #23	1.72
SJLP	570-62	Urban	Belt Junction Fdr. #62	16.16
SJLP	570-63	Urban	Belt Junction Fdr. #63	10.71
SJLP	571-54	Rural	Rushville Fdr. #54	32.17
SJLP	605-HW181	Rural	Highway 48 Fdr. #181	14.97
SJLP	606-WH130	Rural	Worth Fdr. #130	20.01
SJLP	607-PL125	Rural	Parnell Fdr. #125	30.18
SJLP	608-PK140	Rural	Pickering Fdr. #140	32.14
SJLP	639-ML175	Rural	Maitland Fdr. #175	41.91
34 kV				
KCPL	01804	Urban	LETA-ARCO PIPE #4	7.10
KCPL	01806	Urban	LETA-PLATTE #6	8.80
KCPL	10007	Urban	WABASH-BOWDRY #7	5.70
KCPL	10099	Urban	BOWDRY-GRAIN JCT.	3.10
KCPL	10305	Urban	ARCO PIPE-E. CARROLLTON #5	0.75
KCPL	10306	Urban	E. CARROLLTON-AMOCO PIPE #6	1.00
KCPL	10307	Urban	E. CARROLLTON-SANTA FE #7	2.70
KCPL	10401	Urban	CARROLLTON-TWEEDIE JCT. #1	0.62
KCPL	10906	Urban	WABASH-MOSS CREEK #6	1.00
KCPL	10999	Urban	MOSS CREEK-AQUILA BOUNDRY	6.60
KCPL	11603	Urban	TWEEDIE JCT.-BOGARD #3	5.50
KCPL	AMC04	Urban	AMOCO PIPE-CITY OF CARROLLTON #4	0.90
KCPL	AMC99	Urban	AMOCO-PIPE JCT #2	0.20
KCPL	ARC99	Urban	ARCO PIPELINE JCT.-ARCO PIPE	0.40
KCPL	ECJ02	Urban	TWEEDIE JCT.-E. CARROLLTON #2	1.68
KCPL	ECJ99	Urban	N/A	0.10
KCPL	SAJ04	Urban	SANTA FE-WABASH #4	1.00
KCPL	SAJ05	Urban	SANTA FE-CITY OF CARROLLTON #5	1.00
MPS	635	Urban	Appleton City to Rockville	11.80
MPS	635	Urban	Appleton City to (Montrose) Deepwater	20.98
MPS	740	Urban	Lamar to (Iantha) Liberal	13.10
MPS	820	Urban	Norborne to KCPL Moss Creek	7.50
MPS	830	Urban	Post Oak 69 to (Leeton,Calhoun) Greenridge	19.80
MPS	850	Urban	Garden City 69 to Blairstown	16.00
MPS	850	Urban	Post Oak 69 to Blairstown	11.60

MPS	850	Urban	Garden City 69 to East Lynn	6.50
MPS	850	Urban	Ralph Green Plant to Strasburg / East Lynn	18.20
Total 2009 Miles				2,515.43

2009 Schedule Summary

	Urban	Rural	Total 12 kV	34 kV
KCP&L-MO	650.69	247.10	897.79	48.15
GMO	579.03	864.98	1,444.01	125.48
Total	1,229.72	1,112.08	2,341.8	173.63

Missouri Distribution Miles

	Urban	Rural	Total 12 kV	34 kV
KCP&L-MO	1,989.75	1,860.63	3,850.38	158.75
GMO	2,593.82	5,102.95	7,696.77	453.2
Total	4,583.57	6,963.58	11,547.15	611.95

APPENDICES D, E, F, AND G
CONTAIN
HIGHLY CONFIDENTIAL
SENSITIVE OPERATIONAL AND SYSTEM INFORMATION
NOT AVAILABLE TO THE PUBLIC

5.8 APPENDIX H –FERC Reporting

Attached are separate 2008 quarter 3 and 4 reports to Southwest Power Pool (SPP), NERC's Reliability Entity (RE) for this region covering both KCP&L and GMO.

KANSAS CITY POWER & LIGHT COMPANY

Vegetation Contact Outages on Critical Transmission Lines Report

for quarter **Three** **of year** **2008**

Critical transmission line outages due to vegetation contact **None**

Line Name	Category 1, 2, or 3	Outage Date/time	Outage Duration	Cause Description	Corrective Actions

reported by: **Gary M. O'Neil**

report date: **9-Oct-08**

outage category:

1. Vegetation inside right-of-way growing into transmission line
2. Vegetation inside right-of-way falling into transmission line
3. Vegetation outside right-of-way falling into transmission line

reporting guidelines:

1. do **not** report outages caused by natural disasters; tornados, ice storms, etc.
2. do **not** report outages caused by humans or animals; cars, beaver felling tree, etc.
3. multiple sustained outages on an individual line, if caused by the same vegetation, shall be reported as one outage regardless of the actual number of outages within a 24-hour period.

KANSAS CITY POWER & LIGHT COMPANY

Reporting for the former Aquila territory- now consolidated into KCP&L

Vegetation Contact Outages on Critical Transmission Lines Report

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KANSAS CITY POWER & LIGHT COMPANY

Vegetation Contact Outages on Critical Transmission Lines Report

for quarter **Four** **of year 2008**

Critical transmission line outages due to vegetation contact **None**

Line Name	Category 1, 2, or 3	Outage Date/time	Outage Duration	Cause Description	Corrective Actions

reported by: **Gary M. O'Neil**

report date: **29-Jan-09**

outage category:

1. Vegetation inside right-of-way growing into transmission line
2. Vegetation inside right-of-way falling into transmission line
3. Vegetation outside right-of-way falling into transmission line

reporting guidelines:

1. do **not** report outages caused by natural disasters; tornados, ice storms, etc.
2. do **not** report outages caused by humans or animals; cars, beaver felling tree, etc.
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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

4 CSR 240-23.030	)	
Electrical Corporation Vegetation	)	**Case No. EO-2009-0019**
Management Standards and Reporting	)	
Requirements	)	

William P. Herdegen, III, being first duly sworn on his oath, states:

1. My name is William P. Herdegen, III. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Vice President, Transmission and Distribution Operations.

2. I have knowledge of the matters set forth in *KCP&L Greater Missouri Operations Company's 2008 Annual Missouri Vegetation Management Report Pursuant to 4 CSR 240-23.030.*

3. I hereby swear and affirm that the report is true and correct to the best of my knowledge, information and belief.

William P Herdegen III

WILLIAM P. HERDEGEN, III

Subscribed and sworn before me this 1st day of April 2009.

Nicole A. Wehry

Notary Public

My commission expires: Feb 4, 2011

" NOTARY SEAL "
Nicole A. Wehry, Notary Public
Jackson County, State of Missouri
My Commission Expires 2/4/2011
Commission Number 07391200