

BEFORE THE
THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

NOV 30 2001

In the Matter of the Investigation by the)
Commission of the Adequacy of Quality of)
Retail Service Provided by Kansas Electric)
Public Utilities and the Prudence of)
Developing Electric Service Quality)
Standards)

Docket No. 02-GIME-365-GIE

Jeffrey S. Wessman Docket Room

STAFF'S RESPONSE TO ORDER OPENING DOCKET

Comes Now, the Staff of the State Corporation Commission of the State of Kansas ("Staff" and "Commission" respectively) and provides its initial position on the quality of service issues identified in the Commission's Order Opening Docket issued November 16, 2001. Staff appreciates opportunity to address retail service standards and recommends as follows:

A. Substantive Quality of Service Issues.

1. Continuity of electric service. The Commission should consider whether the following are in the public interest: (1) measuring the reliability of retail service of its jurisdictional electric utilities, (2) using recognized industry standards to measure reliability, (3) reporting performance results, and (4) setting performance standards. Industry standards include indices to gauge the reliability of electric distribution service by measuring the frequency and duration of sustained and momentary electric service interruptions.

2. Customer call center performance. The Commission should consider whether the following are in the public interest: (1) measuring the performance of retail customer call center service of its jurisdictional electric utilities that operate central call centers, (2) using recognized industry call center performance standards to measure performance, including service levels,

abandoned call rates, average speed of answer, and connection transfer times among others, (3) reporting performance results, and (4) setting performance standards. Furthermore, to the extent that customer call centers rely on automated greeting systems and call distribution systems, the Commission should consider whether minimum requirements for greeting content, and prudent limits for responsiveness of systems to emergency calls are in the public interest.

3. Meter reading performance. The Commission should consider whether the following are in the public interest: (1) measuring the performance of reading retail customer meters, (2) reporting performance results, and (3) setting performance standards.

4. Compliance with rules and regulations. The Commission should consider whether the following are in the public interest: (1) measuring the performance of its jurisdictional electric utilities in complying with rules and regulations, (2) reporting performance results, and (3) setting performance standards. For instance, the Commission public affairs/consumer protection office tracks the number of violations discovered from customer complaints – a statistic that may be used for performance measurement.

5. Other performance standards. The Commission should also consider other standards, where prudent. For example, electric utilities commonly offer public company websites, yet do not fully use this medium to share public information that would benefit their retail customers. The Commission should consider whether it is in the public interest for electric public utilities to offer public links to vital customer information, such as all retail service tariffs. Staff also recommends that other parties be provided an opportunity to suggest additional quality of service issues to be considered in this docket.

6. For all issues, the Commission should consider the practicality and prudence of developing standards of acceptable performance and requiring performance measurement and

reporting. Staff believes the Commission should consider industry standards that comport to aspects of performance or reliability in the public interest, and how these standards should be evaluated and reported (*e.g.*, actual performance, normalized performance, etc.).

B. Procedural Issues

7. The Commission’s Order Opening Docket also requested Staff to propose a procedure to be followed in this docket. In that regard Staff proposes that all jurisdictional electric utilities be made parties to this docket and appropriately assessed according to K.S.A. 66-1501 *et. seq.*

8. Staff proposes that each substantive category of service should be investigated and addressed separately, until resolved by Commission. The investigation of each issue should commence with Staff’s research and discovery, followed by a Staff summary of investigation and substantive position on the issues (“Staff’s Summary”). Staffs’ Summary may discuss performance measures used generally in the industry and by each company’s management, an analysis of costs and benefits of their use, Staff’s discussion of the appropriate course of action for developing standards, and any other information that Staff believes is appropriate. Staff recommends that no deadline be imposed on each Staff’s summary, because it may hinder Staff’s investigation and limit the quality of the Staff’s Summary.

9. After each Staff’s Summary is provided, Staff recommends that other parties be given an opportunity to file comments and/or a response to Staff’s Summary. Thereafter, Staff proposes the Commission convene an informal, Commission moderated round table discussion of the parties to facilitate information gathering and discussion of the technical issues. Staff recommends the participating parties provide an appropriate technical expert for the topic considered at each round table discussion. Further proceedings would be dictated by the

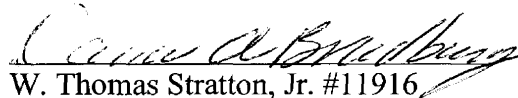
Commission at the end of the the round table discussion. At the completion of the proceedings on one issue, the process would repeat itself until all quality of service issues are addressed.

10. Staff believes it is appropriate to address the issues separately because it would afford all parties an ability to focus on the issue at hand and to invite only appropriate experts for the current topic, without needlessly holding other experts idle while issues outside their field of expertise are addressed.

11. The Commission's Order Opening Docket also determined that initial positions of other parties are to be received within 15 days after receipt of Staff's Response. Staff has been contacted by certain parties who have indicated they anticipate needing more time to file their initial comments. If any party requests such an extension from the Commission, Staff has no objection to allowing a reasonable extension of 30 days, for a total of 45 days, following the filing of Staff's Response.

WHEREUPON, Staff respectfully requests that following the submission of initial comments by other participating parties, the Commission enter its order scheduling further proceedings and allowing Staff to immediately commence its research and investigation of the matters as set forth above, to address whether implementation of quality of service standards for Kansas electric public utilities is in the public interest.

Respectfully submitted,

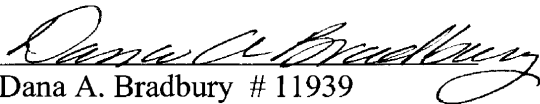


W. Thomas Stratton, Jr. #11916
Dana A. Bradbury # 11939
Assistant General Counsel
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, Kansas 66604-4027
(785) 271-3181

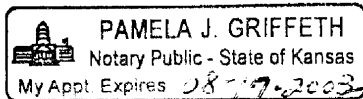
STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

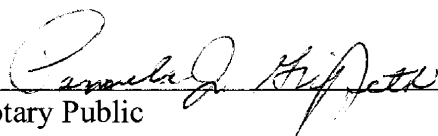
VERIFICATION

Dana A. Bradbury, being duly sworn upon her oath deposes and states that she is an attorney for the Staff of the State Corporation Commission of the State of Kansas, that she has read and is familiar with the foregoing *Staff's Response To Order Opening Docket*, and that the statements contained therein are true and correct to the best of her knowledge, information and belief.


Dana A. Bradbury # 11939
Attorney for Commission Staff
Kansas Corporation Commission of the
State of Kansas

Subscribed and sworn to before me this 30th day of November, 2001.




Notary Public

My Appointment Expires:

CERTIFICATE OF SERVICE

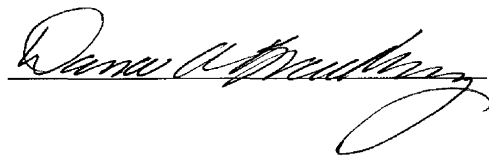
(02-GIME-365-GIE)

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing was placed in the United States mail, postage prepaid, this 30th day of November, 2001, addressed to the following, along with the attached list.

Walker Hendrix
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, Kansas 66604
*****Hand Delivered*****

Mark English
Kansas City Power and Light Company
1201 Walnut
Kansas City, Missouri 64106

Glenda Cafer
Cafer Law Office, L.L.C.
2401 SW Crest Drive
Topeka, Kansas 66614



ELECTRIC COMPANIES
Updated 8-8-00

• - Deregulated

•Kenneth J. Maginley, Manager
BLUESTEM ELEC. COOP., INC.
(Dist Office)
524 Dexter P.O. Box 513
Clay Center, KS 67432

•Ernest J. Barker, Manager
Butler Rural Electric Cooperative Assn., Inc.
216 S. Vine St.
Box 1242
El Dorado, KS 67042

•Donald Hellwig, Manager
D.S.&O. Rural Electric Coop. Assn., Inc.
P.O. Box 286
Solomon, KS 67480

•Robert E. Reece, Manager
Flint Hills Rural Electric Coop. Assn., Inc.
P.O. Box B
Council Grove, KS 66846

Bob Williams
Kansas City Power & Light Company
1201 Walnut
P.O. Box 418679
Kansas City, MO 64106

Jerry Courington
Kansas Gas & Electric Company
120 E. 1st
Wichita, KS 67202

•Jack Clinkscale, Manager
Lane-Scott Electric Cooperative, Inc.
P.O. Box 758
Dighton, KS 67839

•Max Ott, Manager
Alfalfa Electric Cooperative
P.O. Box 39, 121 E. Main
Cherokee, OK 73728

•Kenneth J. Maginley, Manager
BLUESTEM ELECTRIC COOP., INC.
East Highway 24 Box 5
Wamego, KS 66547

•Bonnie Campbell, Acting Manager
Caney Valley Electric Cooperative Assn., Inc.
401 Lawrence
P.O. Box 308
Cedar Vale, KS 67024

•Jerry Jarrett, Manager
Doniphan Electric Cooperative Assn., Inc.
P.O. Box 699
Troy, KS 66087-0699

•Dale Coomes, Manager
Heartland Rural Electric Cooperative, Inc.
120 N. Ozark
P.o. Box 40
Girard, KS 66743

John Welch, Dir. of Technical Services
Kansas Electric Cooperatives, Inc.
7332 SW 21st
P.O. Box 4267
Topeka, KS 66604

James R. Widener, General Manager
Kansas Municipal Energy Agency
6330 Lamar Ave #110
Overland Park, KS 66202-4247

•Shane L. Larson, Manager
Leavenworth-Jefferson Electric Coop., Inc.
P.O. Box 70
McLouth, KS 66054

•Bob Hall, General Manager
Ark Valley Electric Cooperative Assn., Inc.
P.O. Box 1246
South Hutchinson, KS 67504-1246

•Rodney V. Gerdes, Mgr.
Brown-Atchison Electric Coop. Assn., Inc.
1712 Central
P.O. Box 230
Horton, KS 66439

•Kirk Thompson, Manager
CMS Electric Cooperative, Inc.
509 East Carthage
P.O. Box 740
Meade, KS 67864

Myron W. McKinney, Pres./CEO
Empire District Electric Company
602 Joplin Street
P.O. Box 127
Joplin, MO 64802

•James Gouldie, Manager
Jewell-Mitchell Cooperative Electric Co., Inc.
P.O. Box 307
Mankato, KS 666956

Stephen E. Parr, Exec. Vice President
Kansas Electric Power Cooperative, Inc.
600 S.W. Corporate View
P.O. Box 4877
Topeka, KS 66604-0877

Daniel O'Brien, Gen. Manager
Kaw Valley Electric Cooperative Co., Inc.
1100 SW Auburn Rd.
Topeka, KS 66615
P.O. Box 750640
Topeka, KS 66675-0640

•Larry Scott, Manager
Lyon-Coffey Electric Cooperative, Inc.
P.O. Box 229
Burlington, KS 66839

Gene Argo, President & Gen. Manager
Midwest Energy, Inc.
1330 Canterbury Road
P.O. Box 898
Hays, KS 67601-0898

•Douglas J. Jackson, Manager
N.C.K. Electric Cooperative, Inc.
P.O. Box 309
Belleville, KS 66935

•Fenton G. Norwood, Manager
Nemaha-Marshall Electric Coop. Assn., Inc.
P.O. Box O
Axtell, KS 66403

•Walker Parris, General Manager
Ninnescah Rural Electric Coop. Assn., Inc.
P.O. Box 967
Pratt, KS 67124

David L. Jesse, CEO
Pioneer Electric Cooperative Assn., Inc.
P.O. Box 368
Ulysses, KS 67880

•Allan Miller, Manager
Prairie Land Electric Cooperative, Inc.
309 Main Street
P.O. Box 360
Norton, KS 67654

•Allan Miller, Manager
Prairie Land Electric Cooperative, Inc.
(DISTRICT OFFICE)
P.O. Box 168
Bird City, KS 67731

•Leah Tindle, Adm. Manager
Dennis Duff, Operations Mgr.
Radiant Electric Cooperative, Inc.
P.O. Box 390
100 North 15th Street
Fredonia, KS 66736

•Alan L. Henning, Manager
Sedgwick County Electric Coop. Assn., Inc.
P.O. Box 220
Cheney, KS 67025

•Donald R. Minard, Manager
Smoky Hill Electric Cooperative Assn., Inc.
208 West 1st Street
P.O. Box 125
Ellsworth, KS 67439-0125

David Hudson, Dir. of Reg. Adm.
Southwestern Public Service Company
Box 1261
Amarillo, TX 79170

•Kendall Beck, Manager
Summer-Cowley Electric Cooperative, Inc.
2223 North A Street
P.O. Box 220
Wellington, KS 67152

L. Christian Hauck, President/CEO
Sunflower Electric Power Corporation
301 West 13th
P.O. Box 980
Hays, KS 67601

•Debbie Foster, Accountant
Tom Hayward, Line Supt.
Twin Valley Electric Cooperative, Inc.
P.O. Box 385
Altamont, KS 67330

•Terry Janson, Gen. Mgr.
Victory Electric Cooperative Assn., Inc.
North 14th Street, P.O. Box 1335
Dodge City, KS 67801

•David L. Schneider, Manager
Western Cooperative Electric Assn., Inc.
P.O. Box 278
WaKeeney, KS 67672

Marty Bregman/Kelly B. Harrison
Western Resources, Inc.
818 Kansas Avenue
P.O. Box 889
Topeka, KS 66612

W. Scott Keith, Manager, Elec. Serv.
UtiliCorp United Inc.
dba WestPlains Energy
10700 E. 350 Highway
P.O. Box 11739
Kansas City, MO 64138

Neil K. Norman, Manager
Wheatland Electric Cooperative, Inc.
101 Main Street, P.O. Box 130
Scott City, KS 67871

MUNICIPAL ELECTRIC SYSTEMS
Updated 4-5-01

Supt. of Utilities
CITY OF ANTHONY
P.O. Box 504
Anthony, KS 67003

City Clerk
CITY OF ASHLAND
City Hall-P.O. Box 547
Ashland, KS 67831-0547

City Clerk
CITY OF BURLINGAME
City Hall-130 W. Santa Fe
Burlingame, KS 66413

D. D. Dierking
CITY OF CLAY CENTER
City Hall-427 Court
P.O. Box 117
Clay Center, KS 67432

CITY OF COFFEYVILLE
P.O. Box 1629 - 7th & Walnut
Coffeyville, KS 67337

CITY OF LARNED
P.O. Box 70 - 419 Broadway
Larned, KS 67550

CITY OF MCPHERSON
Board of Public Utilities
400 East Kansas Ave., P.O. Box 1008
McPherson, KS 67460

CITY CLERK
CITY OF POMONA
P.O. Box 67
Pomona, KS 66076

Supt. of Electric Utilities
PRATT MUNICIPAL ELEC.
321 West 10th
Pratt, KS 67124

Electric Utility Director
CITY OF RUSSELL
P.O. Box 112
Russell, KS 67665

CITY OF SABETHA
P.O. Box 187-805 Main
Sabetha, KS 66534

City Manager
STERLING MUNICIPAL LIGHT &
POWER
P.O. Box 287
Sterling, KS 67579

City Clerk
CITY OF WELLINGTON
317 South Washington
Wellington, KS 67152

Director of Utilities
CITY OF WINFIELD
P.O. Box 646
Winfield, KS 67156