

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

In the Matter of Compliance Filings by )  
Kansas City Power & Light Company, )  
Westar Energy, Inc., Kansas Gas and Electric ) Docket No. 19-KCPE-178-CPL  
Company and Evergy, Inc. Regarding Service )  
Quality and Reliability Performance Standards )  
Pursuant to the Commissions Order in )  
Docket No. 18-KCPE-095-MER. )

**COMPLIANCE FILING**

COME NOW Evergy Metro, Inc. d/b/a Evergy Kansas Metro (“Evergy Kansas Metro”), Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. (collectively referred to herein as “Evergy Kansas Central”);” and all three collectively referred to herein as “Companies”)<sup>1</sup>, and submit this compliance filing (“Compliance Filing”), as required by the Order of the State Corporation Commission of the State of Kansas (“Commission”) issued in Docket No. 18-KCPE-095-MER (“18-095 Docket”) on May 24, 2018 (“Merger Order”). In its Merger Order the Commission approved the Non-Unanimous Settlement Agreement submitted on March 7, 2018, by certain parties to the 18-095 Docket (“Settlement Agreement”). Attachment A to the Settlement Agreement contains Merger Conditions, some of which require the Companies to make post-merger filings with the Commission. Certain of these filings will be submitted in this docket established for that purpose.

1. Merger Condition 36 provides as follows:

**Service Quality and Reliability Performance Standards:** KCP&L and Westar will report the particular performance metrics as set forth in Exhibits BA-4 and BA-5 of the direct testimony of Bruce Akin. Exhibits BA-1 through BA-5 are provided in Attachment 4 to the Settlement

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<sup>1</sup> Effective October 8, 2019, Evergy Metro, Inc. d/b/a Evergy Kansas Metro adopted the service territory and tariffs of KCP&L; *Order Approving Name Change*, Docket No. 20-KCPE-122-CCN, dated October 8, 2019. Effective October 8, 2019, Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. d/b/a collectively as Evergy Kansas Central adopted the service territory and tariffs of Westar; *Order Approving Name Change*, Docket No. 20-WSEE-123-CCN, dated October 8, 2019.

Agreement. **KCP&L and Westar will also provide the reports described in Attachment 5 to the Settlement Agreement.** Changes to future reporting can be made, as mutually agreed upon by Applicants, Staff and CURB.

2. In accordance with the **bolded** portion of Merger Condition 36 relating to Attachment 5 to the Settlement Agreement,<sup>2</sup> the Companies hereby submit to the Commission the information required in the attached **Exhibit 1**:

Respectfully submitted,

/s/ Cathryn J. Dinges

Cathryn J. Dinges, (#20848)

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Evergy, Inc.

818 South Kansas Avenue

Topeka, Kansas 66612

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<sup>2</sup> Although the Companies are required to, “[...]provide Staff with the annual normalized year-end SAIDI, SAIFI, and CAIDI results for both Evergy Kansas Metro and Evergy Kansas Central within 90 days of the end of the calendar year[...].” (see *Settlement Agreement*, Attachment 5)—which would have made this Compliance Filing due on March 31, 2020—pursuant to the March 19, 2020 *Emergency Order Staying All Dockets* issued in Docket No. 20-GIMX-393-MIS, the Companies were unable to file until the Commission resumed operations and acceptance of filings today, April 6, 2020.

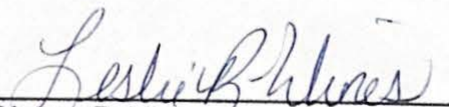
## VERIFICATION

STATE OF KANSAS                    )  
  ) ss:  
COUNTY OF SHAWNEE            )

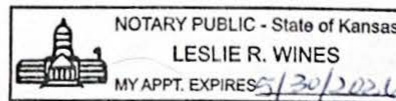
Cathryn J. Dinges, upon oath first duly sworn, states that she is Senior Director and Regulatory Affairs Counsel for Evergy Kansas Central, Inc. and Evergy Kansas South, Inc., and Evergy Kansas Metro, Inc. that she has reviewed the foregoing pleading, that she is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of her knowledge and belief.

  
Cathryn J. Dinges

Subscribed and sworn to before me this 1<sup>st</sup> day of April, 2024.

  
Notary Public

My Appointment Expires: May 30, 2026



## CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed, this 1<sup>st</sup> day of April 2024, to all parties of record as listed below:

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*/s/ Cathy J Dinges*

Cathy J. Dinges

Kansas Corporation Commission  
Docket 19-KCPE-178-CPL  
Eversource Kansas Metro and Eversource Kansas Central  
Commitment 36 – Attachment 5 – Additional Reporting Annual Report

**Background**

In Docket No. 18-KCPE-095-MER, In the Matter of the Application of Great Plains Energy Incorporated, Kansas City Power & Light Company and Westar Energy, Inc. for Approval of the Merger of Eversource Kansas Central, Inc. and Great Plains Energy Incorporated, the Kansas Corporation Commission (“Commission”) issued its Order Approving Merger Application (“Order”) on May 24, 2018. The Order approved the Non-Unanimous Settlement Agreement (“Agreement”) filed on March 7, 2018. The Agreement included a commitment made by Eversource Kansas Metro and Eversource Kansas Central (“Company”) to file additional reporting regarding Reliability and Vegetation Management, specifically Commitment 36, Service Quality and Reliability Performance Standards.

**Commitment No. 36:**

Service Quality and Reliability Performance Standards: If Eversource Kansas Metro or Eversource Kansas Central fail to meet a particular performance metric threshold set forth in Exhibits BA-1, BA-2, BA-3 of the direct testimony of Bruce Akin, then penalties would be used to pay for system upgrades to improve reliability and will not be recovered in cost of service. If Eversource Kansas Metro or Eversource Kansas Central perform without penalties on any metric for three consecutive calendar years, then the reporting and penalty provisions for that metric for that utility will terminate. Eversource Kansas Metro and Eversource Kansas Central will report the performance metrics as set forth in Exhibits BA-4 and BA-5 of the direct testimony of Bruce Akin. Exhibits BA-1 through BA-5 are provided in Attachment 4 to the Settlement Agreement. Eversource Kansas Metro and Eversource Kansas Central will also provide the reports described in Attachment 5 to the Settlement Agreement. Changes to future reporting can be made, as mutually agreed upon by Applicants, Staff and CURB.

**Attachment 5: Applicants Additional Quality of Service Commitments**

- A. Applicants will provide Staff with the annual normalized year-end SAIDI, SAIFI, and CAIDI results for both Eversource Kansas Metro and Eversource Kansas Central within 90 days of the end of the calendar year and will compare those results to the 5-year annual normalized average (2012-2016) for each individual metric. If the actual results of any individual metric vary substantially from the 5-year average, then Applicants will provide a high-level summary of the reasons why such degradation occurred.
- B. Present IT system consolidation updates to Staff annually during the moratorium period related to:
- Outage Management System (OMS)
  - Energy Management System (EMS)
  - Geographic Information System (GIS)
  - Enterprise Asset Management (EAM)

C. Reliability Reporting Criteria:(Additional reporting during the moratorium period)

C1) Provide vegetation management reporting including:

- |                                  |   |
|----------------------------------|---|
| a. Miles/acres cleared           | d. Actual dollars spent versus budgeted |
| b. Cycles and off cycle clearing | e. Dollars per mile/acre cleared        |
| c. Outages related to vegetation |   |

C2) Provide post storm review of significant outages causes on each Major Event Day:

- Using "Major Event Day" as defined within IEEE1366
- Develop lessons learned

C3) Provide summary results of transmission system patrols

2023 Quality of Service Reliability Statistics

Evergy Kansas Metro  
Reliability Data  
2023

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year to Date
IEEE 1366 Normalized SAIDI	3.48	9.77	3.85	6.11	4.89	6.54	15.17	9.44	4.58	5.28	4.31	4.66	78.08
IEEE 1366 Normalized SAIFI	0.038	0.111	0.049	0.081	0.044	0.090	0.089	0.110	0.054	0.077	0.058	0.057	0.859
IEEE 1366 Normalized CAIDI	92.59	88.12	78.05	75.43	110.61	72.52	170.09	86.19	84.05	68.52	73.71	81.50	86.59

Evergy Kansas Central  
Reliability Data  
2023

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year to Date
IEEE 1366 Normalized SAIDI	5.61	4.41	3.65	9.41	10.37	11.77	12.18	10.82	7.53	6.18	4.47	4.59	90.99
IEEE 1366 Normalized SAIFI	0.060	0.049	0.044	0.100	0.122	0.110	0.092	0.104	0.082	0.084	0.057	0.065	0.968
IEEE 1366 Normalized CAIDI	93.17	89.85	83.59	93.87	85.28	107.24	132.43	104.33	92.14	73.51	78.50	70.37	89.31

NOTES:

1. Metrics are normalized using IEEE 1366 including partial power outages.
2. Metrics represent transmission and distribution reliability for Kansas customers only.
3. SAIDI and SAIFI metrics were calculated by using the customer count for each month and then summing the individual months metrics for the annual metric.

2012-2016 Quality of Service Reliability Statistics

Evergy Kansas Metro

	2012	2013	2014	2015	2016	Average
IEEE 1366 Normalized SAIDI	61.6	65.2	74.3	108.9	84.2	78.8
IEEE 1366 Normalized SAIFI	0.60	0.65	0.78	0.95	0.85	0.77
IEEE 1366 Normalized CAIDI	102.7	100.3	95.3	114.6	99.1	102.4

Evergy Kansas Central

	2012	2013	2014	2015	2016	Average
IEEE 1366 Normalized SAIDI	111.3	118.4	118.3	124.2	133.7	121.2
IEEE 1366 Normalized SAIFI	1.24	1.27	1.34	1.37	1.28	1.30
IEEE 1366 Normalized CAIDI	90.0	93.5	88.2	90.4	104.1	93.2

NOTES:

1. Metrics were normalized using IEEE 1366 excluding partial power outages.
2. Metrics represent transmission and distribution reliability for Kansas customers only.
3. SAIDI and SAIFI metrics were calculated by using a single customer count effective December of each year.

**B. IT System Consolidation**

The Company will work with Staff to schedule a meeting to fulfill this commitment.

**C1) Vegetation Management Reporting****a) Annual Tree Trimming Expenditures**

Distribution System:

<b>Vegetation Management Budget vs Actual Distribution System - KS</b>				
<b>Year</b>	<b>Budget</b>		<b>Actual</b>	
	<b>KS Central</b>	<b>KS Metro</b>	<b>KS Central</b>	<b>KS Metro</b>
2023	\$21,281,445	\$6,502,664	\$18,868,176	\$5,662,904

Costs include contracted program management, scheduled and non-scheduled line clearance work in the company's KS service territory.

Transmission System:

<b>Vegetation Management Budget vs Actual Transmission System - KS</b>				
<b>Year</b>	<b>Budget</b>		<b>Actual</b>	
	<b>KS Central</b>	<b>KS Metro</b>	<b>KS Central</b>	<b>KS Metro</b>
2023	\$2,029,393	\$714,361	\$2,045,326	\$1,510,219

Costs include contracted program management, scheduled and non-scheduled line clearance work in the company's KS service territory.

**b) Annual Expenditures: Scheduled and Non-Scheduled**

Distribution System:

<b>Vegetation Management Scheduled vs Non-Scheduled Expenditures Distribution System - KS</b>				
<b>Year</b>	<b>Scheduled</b>		<b>Non-Scheduled</b>	
	<b>KS Central</b>	<b>KS Metro</b>	<b>KS Central</b>	<b>KS Metro</b>
2023	\$17,185,568	\$3,307,633	\$1,682,608	\$2,355,271

Costs include contracted program management, labor and equipment.



Transmission System:

Vegetation Management Scheduled vs Non-Scheduled Expenditures Transmission System - KS				
Year	Scheduled		Non-Scheduled	
	KS Central	KS Metro	KS Central	KS Metro
2023	\$1,636,261	\$1,057,153	\$409,065	\$453,066

Costs include contracted program management, labor and equipment.

c) Annual Miles Trimmed and/or Cleared

Annual Mileage Trimmed/Cleared Transmission and Distribution Systems - KS				
Year	Transmission		Distribution	
	KS Central	KS Metro	KS Central	KS Metro
2023	1,263	231	2,397	523

d) Annual Cost per Mile

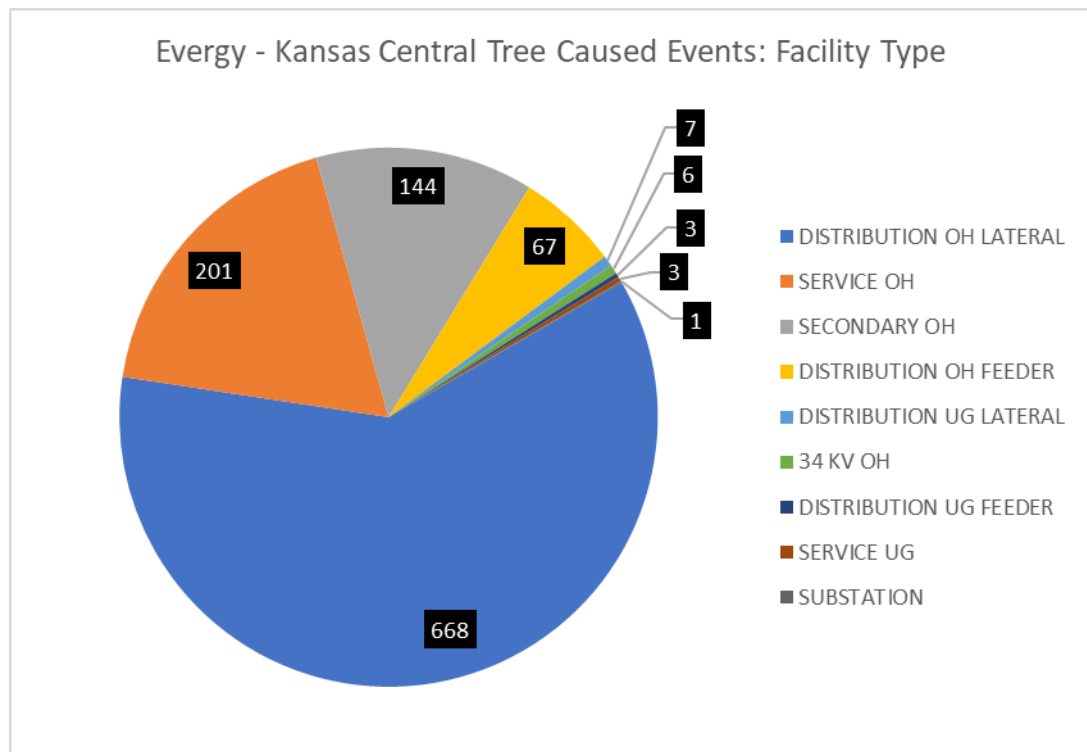
Annual Dollars per Mile Expenditures Transmission and Distribution Systems - KS				
Year	Transmission		Distribution	
	KS Central	KS Metro	KS Central	KS Metro
2023	\$1,296	\$4,576	\$7,170	\$6,324

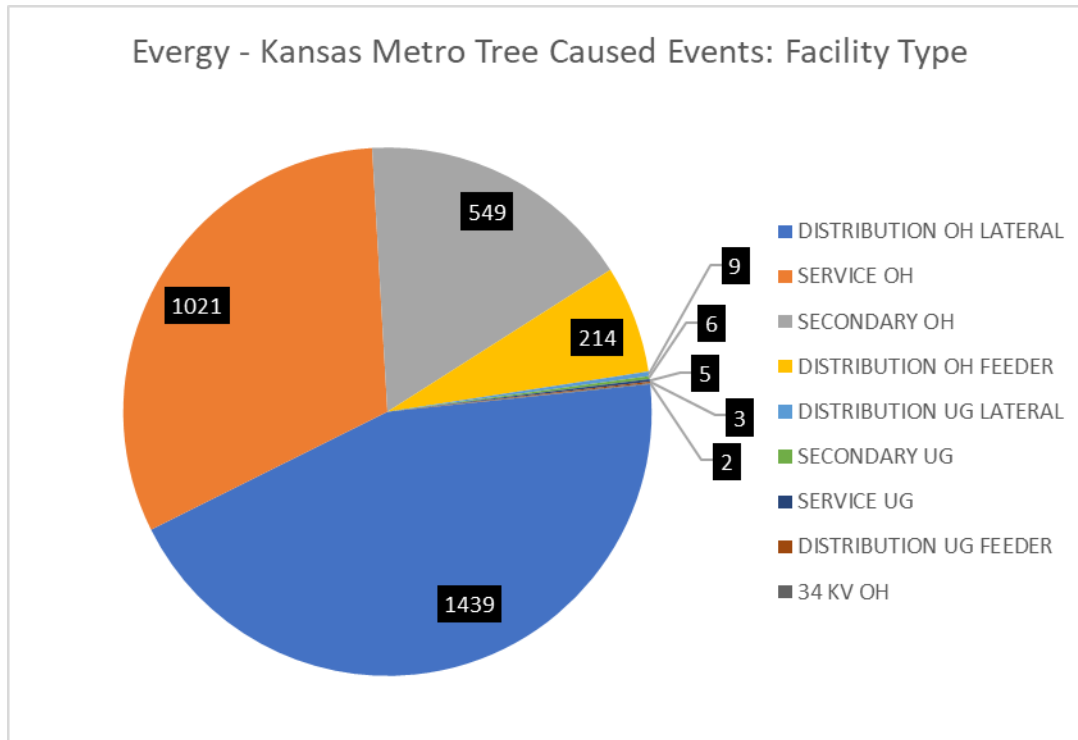
e) Outages Related to Vegetation: 2023 Un-Normalized

Tree Caused Outages by Service Center Totals Distribution System – KS			
2023 Kansas Central: Tree-Caused Outages by Service Center		2023 Kansas Metro: Tree-Caused Outages by Service Center	
Service Center	Outages	Service Center	Outages
Abilene	44	Johnson County	871
Arkansas City	60	Ottawa/Paola	193
Atchison	209	Southland	36
El Dorado	41		
Emporia	107		
Ft. Scott	45		
Humboldt	66		

2023 Kansas Central: Tree-Caused Outages by Service Center		2023 Kansas Metro: Tree-Caused Outages by Service Center	
Service Center	Outages	Service Center	Outages
Hutchinson	170		
Independence	68		
Junction City	48		
Lawrence	257		
Leavenworth	263		
Manhattan	109		
Marysville	38		
Newton	70		
Parsons	61		
Pittsburg	123		
Salina	77		
Shawnee	239		
Topeka	688		
Wichita	465		
<b>Grand Total</b>	<b>3,248</b>	<b>Grand Total</b>	<b>1,100</b>

Chart 1 and Chart 2 provide tree caused outage totals by company and by facility type impacted in the Kansas Central and Kansas Metro service territories.





f) Annual Tree Trimming Expenditures

Distribution System:

Vegetation Management Budget vs Actual Distribution System - KS				
Year	Budget		Actual	
	KS Central	KS Metro	KS Central	KS Metro
2022	\$18,021,882	\$5,853,244	\$16,416,021	\$6,938,682

Costs include contracted program management, scheduled and non-scheduled line clearance work in the company's KS service territory.

Transmission System:

Vegetation Management Budget vs Actual Transmission System - KS				
Year	Budget		Actual	
	KS Central	KS Metro	KS Central	KS Metro
2022	\$1,516,996	\$814,434	\$1,344,859	\$1,143,056

Costs include contracted program management, scheduled and non-scheduled line clearance work in the company's KS service territory.

## **C(2) Major Event Day Summary**

A summary for the various major Event Days from January 1, 2023, through December 31, 2023.

### **March 31, 2023**

Thunderstorms impacted portions of our service territory.

LEGACY AREA	CUSTOMERS IMPACTED	CMI
KS CENTRAL	23,572	3,110,842

\*CMI = Customer Minutes Interrupted

### **June 30, 2023**

Thunderstorms impacted portions of our service territory.

LEGACY AREA	CUSTOMERS IMPACTED	CMI
KS CENTRAL	15,962	3,605,193

### **June 30, 2023**

Thunderstorms impacted portions of our service territory.

LEGACY AREA	CUSTOMERS IMPACTED	CMI
KS METRO	1,842	151,791

### **July 5, 2023**

Thunderstorms impacted portions of our service territory.

LEGACY AREA	CUSTOMERS IMPACTED	CMI
KS METRO	3,125	870,983

### **July 14, 2023**

Thunderstorms impacted portions of our service territory.

LEGACY AREA	CUSTOMERS IMPACTED	CMI
KS CENTRAL	67,277	33,248,196

### **July 14, 2023**

Thunderstorms impacted portions of our service territory.

LEGACY AREA	CUSTOMERS IMPACTED	CMI
KS METRO	88,668	102,399,335

### **July 15, 2023**

Thunderstorms impacted portions of our service territory.

LEGACY AREA	CUSTOMERS IMPACTED	CMI
KS CENTRAL	11,910	2,998,406

**July 15, 2023**

Thunderstorms impacted portions of our service territory.

LEGACY AREA	CUSTOMERS IMPACTED	CMI
KS METRO	8,692	12,169,557

**July 30, 2023**

Thunderstorms impacted portions of our service territory.

LEGACY AREA	CUSTOMERS IMPACTED	CMI
KS CENTRAL	12,798	2,666,354

**July 30, 2023**

Thunderstorms impacted portions of our service territory.

LEGACY AREA	CUSTOMERS IMPACTED	CMI
KS METRO	30,493	12,161,588

**July 31, 2023**

Thunderstorms impacted portions of our service territory.

LEGACY AREA	CUSTOMERS IMPACTED	CMI
KS METRO	9,798	2,548,901

**August 5, 2023**

Thunderstorms impacted portions of our service territory.

LEGACY AREA	CUSTOMERS IMPACTED	CMI
KS CENTRAL	15,870	3,367,219

**September 23, 2023**

Thunderstorms impacted portions of our service territory.

LEGACY AREA	CUSTOMERS IMPACTED	CMI
KS METRO	2,941	344,546

**Lessons Learned**

In our operations, we prioritize proactive measures for storm restoration. When meteorological data indicates potential impacts within or near our jurisdiction, we implement a preparedness plan to ensure the availability of necessary resources.

Our damage assessment and wire down teams have consistently demonstrated their value during storm scenarios, prompting their ongoing deployment during such events. These teams assess

damages and secure unsafe wires, requiring crew intervention to ensure safety.

Furthermore, our mutually beneficial partnerships with utilities in the Midwest Mutual Assistance Group prove invaluable when additional resources are required to support our restoration endeavors.

### **C(3). Transmission System Summary - KCC**

All Evergy Kansas Central and Evergy Kansas Metro transmission lines are patrolled annually by aerial and/or ground patrol. Evergy Kansas Central has 47,842 structures and Evergy Kansas Metro has 3,709 structures. There were 103 combined corrective actions, based on aerial and ground patrols, completed in 2023. There are 67 combined corrective actions scheduled for 2024 completion.

Detailed and intrusive inspections were completed on transmission lines in both Evergy Kansas Central and Evergy Kansas Metro service areas in 2023. Evergy Kansas Central had 6,300 poles and Evergy Kansas Metro had 706 poles for a total of 7,006 poles that were inspected in the combined service areas of which, 2 were found in need of corrective action. There were 69 combined corrective actions, based on detailed and intrusive inspections, completed in 2023. There are 76 poles scheduled for completion in 2024.

Patrol means a simple visual inspection, of applicable electrical corporation equipment and structures, which is designed to identify obvious structural problems and hazards. Patrols may be carried out in the course of another electrical corporation business.

Visual inspection of circuits and circuit sections are completed using a checklist and/or documented procedure to perform a condition assessment of the structure, and structural supporting components, insulators, attached conductors and equipment. The condition assessment checklist and/or procedure shall target hazards that will affect public or employee safety and system reliability.

Detailed inspection means an inspection where individual pieces of equipment and structures are carefully examined, visually and through use of routine diagnostic testing, as appropriate, and (if practicable and if useful information can be so gathered) opened, and the condition of each rated and recorded; Intrusive inspection means an inspection involving movement of soil, taking samples for analysis, and/or using more sophisticated diagnostic tools beyond visual inspections or instrument reading.

KS Central Transmission				Completed Through December 2023			
System Class	Inspection Type	Facility Type	Units	Inspections Planned for 2023	Inspections Completed During 2023	Inspections Completed Prior to 2023 (Ahead of Plan)	Inspections Pending in 2023 Outside of Plan
Transmission	Aerial and Ground Patrol	Overhead Circuits Structures & Equipment	Structures	47,842	47,842	0	0
		Underground Structures and Equipment	Structures	6	6	0	0
	Detail and Intrusive	Wood/Steel Poles	Poles	6,783	6,300	0	0
KS Metro Transmission				Completed Through December 2023			
System Class	Inspection Type	Facility Type	Units	Inspections Planned for 2023	Inspections Completed During 2023	Inspections Completed Prior to 2023 (Ahead of Plan)	Inspections Pending in 2023 Outside of Plan
Transmission	Aerial and Ground Patrol	Overhead Circuits Structures & Equipment	Structures	3,709	3,709	0	0
		Underground Structures and Equipment	Structures	0	0	0	0
	Detail and Intrusive	Wood/Steel Poles	Poles	574	706	0	0



KS Central Transmission Corrective Action (CA) Summary							
System Class	Inspection Type	Facility Type	Component	CA Planned in 2022	CA Completed in 2023	CA Planned in 2024	CA Planned after 2024
Transmission	Aerial and Ground Patrol	Overhead Structures & Equipment	Poles, Switches	63	92	64	37
	Aerial and Ground Patrol	Underground Structures and Equipment	Manhole	0	0	0	0
	Detail and Intrusive	Poles and Structures - Wood/Steel	Poles	62	66	70	82
KS Metro Transmission Corrective Action (CA) Summary							
System Class	Inspection Type	Facility Type	Component	CA Planned in 2023	CA Completed in 2023	CA Planned in 2024	CA Planned after 2024
Transmission	Aerial and Ground Patrol	Overhead Structures & Equipment	Poles, Switches	9	11	3	0
	Aerial and Ground Patrol	Underground Structures and Equipment	Manhole	0	0	0	0
	Detail and Intrusive	Poles and Structures - Wood/Steel	Poles	3	3	6	0