

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

APR 30 2012

In the Matter of Kansas City Power & Light)
Company's Compliance Filings as Required)
by Commission Order Dated September 17,)
2008 in Docket No. 07-KCPE-1064-ACQ.)
)

by
State Corporation Commission
of Kansas
Docket No. 12-KCPE-791-CPL

**KANSAS CITY POWER & LIGHT COMPANY'S
REPORT OF QUALITY ASSURANCE PERFORMANCE METRICS
FOR THE FIRST QUARTER OF 2012**

COMES NOW Kansas City Power & Light Company ("KCP&L" or the "Company") and files its *Report of Quality Assurance Performance Metrics for the First Quarter of 2012* ("Report") in compliance with (1) the February 28, 2008 Joint Motion and Settlement Agreement ("Stipulation") filed by KCP&L *et al*, (2) the Kansas Corporation Commission's ("KCC" or "Commission") May 15, 2008 Order Granting Joint Motions to Approve Stipulation and Agreement and Approving Agreements ("May 15 Order"), and (3) the September 17, 2008 Commission Order Ending the Consolidation of Dockets, Providing for Compliance Filings, and Closing Dockets ("September 17 Order") all under Docket No. 07-KCPE-1064-ACQ ("1064 Docket") titled *In the Matter of the Joint Application of Great Plains Energy Incorporated, Kansas City Power & Light Company and Aquila, Inc. for approval of the Acquisition of Aquila, Inc. by Great Plains Energy Incorporated.*¹

¹ The September 17 Order directed the opening of a sub-docket 04-KCPE-1064-ACQ-CPL-1 under which these compliance filings were to be made. Due to system changes at the Commission, sub-dockets cannot be opened. All quarterly report filings prior to this Report were made under the original Docket No. 07-KCPE-1064-ACQ with a heading showing the CPL-1 sub-docket. Beginning with this first quarter 2012 report, KCP&L is initiating the opening of a separate compliance ("CPL") docket. All quality assurance performance metrics reports for 2012 and beyond will be filed under the new CPL docket with the same heading as currently used to tie back to the 1064 Docket. Notice was filed in both the 1064 Docket and the new compliance docket simultaneous with this Report filing reflecting the change.

Attachments 1 and 2 of the Stipulation provide for reporting on three separate areas of service quality: Continuity of Service (or Reliability) metrics, Customer Call Center metrics, and Meter Reading metrics. Attached hereto as **Exhibit 1** and **Exhibit 2**, respectively, are KCP&L's *Service Quality Report* and *Service Quality Report Summary* for first quarter 2012 and the rolling 12-month period of April 1, 2011 through March 30, 2012 consistent with the requirements of the Stipulation.

KCP&L Kansas Reliability Metrics

KCP&L tracks three Reliability metrics on a Kansas-only basis for purposes of this report. The System Average Interruption Duration Index ("SAIDI") is the average outage duration per customer served. The Stipulation sets a threshold for the Company's SAIDI metric for the calendar year for its Kansas customers – not to exceed an average outage duration of 130.0 minutes per customer served. The System Average Interruption Frequency Index ("SAIFI") is the average number of interruptions that a customer would experience. The Stipulation sets a threshold for the Company's SAIFI metric for the calendar year for its Kansas customers – not to exceed an average of 0.92 interruptions per customer. The Customer Average Interruption Duration Index ("CAIDI") gives the average outage duration that any given customer would experience. CAIDI can also be viewed as the average restoration time. The Stipulation requires KCP&L to provide CAIDI metrics for information only.

Storm Impacts on KCP&L First Quarter 2012 Reliability Metrics

The Stipulation requires the reporting of normalized reliability metrics as defined by the Commission's *Electric Reliability Requirements*, pursuant to the Commission's

Order in KCC Docket No. 02-GIME-365-GIE (“365 Docket Order” and “365 Docket”).² (See Stipulation, Attachment 2, p. 3.) In order to normalize under the 365 Docket, a Major Event must, in part, have “sustained interruptions to more than 10% of a utility’s customers within a 24-hour period.”³ Of note, the 365 Docket Order also provides that a utility must “notify the commission of any event that qualifies as a major event, as defined in subsection 3(n), or results in sustained interruptions to more than 10,000 customers.”⁴

The normalization requirement under the 365 Docket does not fully recognize the effect of severe storms that impacted KCP&L’s service territory. KCP&L has experienced multiple severe storms in the past three years. None of these met the threshold set within the 365 Docket to qualify as a Major Event and therefore none of these storms result in a normalization adjustment to KCP&L’s Reliability metrics.

The Stipulation does provide for the Company to present evidence of Extraordinary Events as defined within the Stipulation.⁵ The Stipulation states in part:

The parties recognize that there may be certain extraordinary events affecting the Company’s Kansas and/or Missouri electric operations that occur from time to time, which: (1) are beyond the control of the utility, such as an act of nature, and (2) may affect the utility’s ability to meet the service metrics agreed to in this agreement. Upon the occurrence of an extraordinary event as that term is further defined below, KCP&L shall document the event and its impact on the utility’s customer operation or distribution operation performance, as applicable. Should KCP&L’s service performance become inferior to the service metrics of any of the performance indicators specified in the Table in Attachment, KCP&L will have the opportunity to present evidence of an extraordinary event as part

² Docket No. 02-GIME-365-GIE Order dated October 4, 2004.

³ *Id.*, Attachment A, item 3(n), page 2 of 10.

⁴ *Id.*, Attachment A, item 6(a), page 7 of 10.

⁵ Joint Motion and Settlement Agreement dated February 28, 2008 filed in Docket No. 07-KCPE-1064-ACQ, Attachment 2, page 4.

of the applicable quarterly report, attaching supporting documentation as previously described.⁶

No storm events during first quarter 2012 met the criteria for a 365 Docket normalization event and no storm events during this quarter were severe enough to report the event to the Commission. For the 2011 reporting period included in the 12-month rolling average (April 1, 2011 through December 31, 2011), no KCP&L storm events met the criteria for a 365 Docket normalization event; however, three events were severe enough to require the Company to report such events to the Commission.⁷ These storm events clearly fall within the definition of an Extraordinary Event under the Stipulation, "...an event beyond the control of the utility, which shall include acts of God...lightning...storms..." (Stipulation, Attachment 2, "Extraordinary Events.")

Pursuant to the Stipulation, KCP&L is documenting Extraordinary Events and their impact on KCP&L's performance as part of this Report. To more clearly represent the impact on reliability, additional rows, Rows 16.1 through 20.1, have been incorporated into **Exhibit 1** and an additional column titled *Rolling 12-Month Totals Reflecting Impact of Extraordinary Events* has been included in **Exhibit 2**. The inserted rows and columns allow an easy evaluation of the Extraordinary Events normalized data against the data reported without consideration of the Extraordinary Events.⁸

The Stipulation allows for consideration of the impact of Extraordinary Events should KCP&L's service performance become inferior to the service metric threshold of any of the specified performance indicators. Calendar year 2011 included an unusual

⁶ *Id.*

⁷ Docket No. 02-GIME-365-GIE, *Kansas City Power & Light Company June 18 – 21 Storm Events Report* filed July 27, 2011, *Kansas City Power & Light Company July 12 – 14 Storm Events Report* filed August 11, 2011, and *Kansas City Power & Light Company Storm Event Report – August 18-20, 2011* filed September 19, 2011.

⁸ Note that information reported for second, third and fourth quarter 2011 will be replaced with the appropriate 2012 quarter data. The 2011 data will not be considered at year-end for 2012 metric levels.

number of severe storms and a high frequency of storms generally. The first quarter 2012 and the cumulative impact of the storms occurring during the second and third quarters of 2011 on the 12-month rolling average ending March 30, 2012 on the SAIDI, SAIFI and CAIDI are summarized in **Table 1** below.⁹

Table 1: KCP&L's Kansas Reliability Metrics						
	SAIDI ^a	SAIDI Excluding Extraordinary Events ^b	SAIFI ^a	SAIFI Excluding Extraordinary Events ^b	CAIDI ^a	CAIDI Excluding Extraordinary Events ^b
1st Qtr 2012	9.13	9.13	0.102	0.102	89.33	89.33
12-Month Rolling Performance through March 2012	232.62	88.02	0.936	0.680	248.43	129.43
1 st Tier Threshold ^c	<130.0	<130.0	<0.920	<0.920	N/A	N/A

^a SAIDI, SAIFI and CAIDI calculated pursuant to the definitions under the Stipulation in Docket No. 07-KCPE-1064-ACQ which refer to the calculation parameters under the 365 Docket. No storm events during 2011 met the 365 Docket Electric Reliability Requirements item 3(n) Major Event normalization definition. The second and third quarter 2011 reports incorrectly identified storm events on June 18-19, July 12 and August 18-20, 2011 as meeting the 365 Docket normalization definition. These events met the 365 Docket threshold for reporting storms to the Commission – a separate threshold from the normalization definition.

^b SAIDI, SAIFI and CAIDI calculated excluding certain Extraordinary Events as allowed under the Stipulation. For purposes of this Report, the following storm-related Extraordinary Event dates were excluded: June 18-19, July 12, and August 18-20.

^c SAIDI and SAIFI metric thresholds represent maximums or not to exceed levels; *i.e.*, a lower value is better.

⁹ The supporting documentation of the impact of the 2011 claimed Extraordinary Events was provided with the Company's February 7, 2012 Report of Quality Assurance Performance Metrics for 2011.

KCP&L Call Center Metrics

KCP&L tracks four Call Center metrics for purposes of this report. Each is tracked on a total Company basis as the Call Center services all KCP&L customers and cannot reasonably be segmented by state. The Blocked Call Rate (also referred to as the Call Blockage Rate) is defined as the percentage of total incoming calls attempted to the Company's Call Center that are blocked. Blocked calls are those that receive a busy signal or a courtesy response when all circuits are busy at the time the customer attempts to call.¹⁰ The Stipulation sets a threshold for the Company's Blocked Call Rate metric for the calendar year – not to exceed 1.00% of calls. Agent Service Level is defined as the percentage of total calls entering the agent queue that are answered within twenty (20) seconds.¹¹ The Stipulation sets a threshold for the Company's Agent Service Level metric – less than 67% of such calls. Average Speed of Answer ("ASA") is the average time, measured in seconds, required to answer all agent calls.¹² The Stipulation sets a threshold for the Company's ASA metric – not greater than 47.5 seconds. Abandoned Call Rate is defined as the percentage of total agent calls received by the Company's Call Center that are abandoned.¹³ The Stipulation sets a threshold for the Company's Abandoned Call Rate – not to exceed 5.00%.

As shown in **Table 2** below, KCP&L's Call Center metrics for 2011 are better than each of the thresholds set in the Stipulation.

¹⁰ See more detailed definition on Attachment 2 of the Stipulation, page 2.

¹¹ *Id.*

¹² *Id.*

¹³ *Id.*, page 1.

Table 2: KCP&L's Call Center Metrics (Total Company)

	Blocked Call Rate ^a	Blocked Call Rate Excluding Extraordinary Events ^b	Service Level ^a	Service Level Excluding Extraordinary Events ^b	ASA ^a	ASA Excluding Extraordinary Events ^b	Abandoned Call Rate ^a	Abandoned Call Rate Excluding Extraordinary Events ^b
1Q 2012	1.0%	---	73%	---	37 Sec.	---	3.73%	---
12-Month Rolling Performance through 3/30/2012	0.93%	---	73%	---	41 Sec.	---	4.35%	---
1 st Tier Threshold	<1.00%	<1.00%	>67% ^c	>67% ^c	<47.5 Sec.	<47.5 Sec.	<5.00%	<5.00%

^a Call Center metrics calculated pursuant to Commission approved Stipulation in Docket No. 07-KCPE-1064-ACQ without any adjustment for storm impacts / Extraordinary Events.

^b Call Center metrics calculated pursuant to Commission approved Stipulation in Docket No. 07-KCPE-1064-ACQ which allows for exclusion of Extraordinary Events as defined in Attachment 2 to the Stipulation. KCP&L incurred multiple storms qualifying as Extraordinary Events during 2011; however, KCP&L met the metrics without need to claim any of these Events.

^c The Service Level threshold is a minimum; that is, a higher percentage is better. This is in contrast to the other Call Center metric thresholds which represent maximums or not to exceed levels; *i.e.*, a lower value is better.

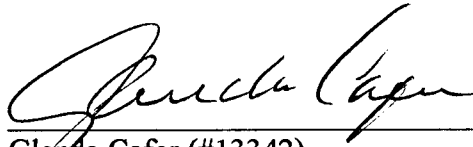
KCP&L Meter Reading Metrics

KCP&L tracks one Meter Reading metric on a Kansas-only basis for purposes of this report. The Meter Reading metric tracks the number of Kansas bills the Company must estimate (as opposed to basing the bill on a specific meter reading) per thousand Kansas customers. The Stipulation sets a threshold for the Company's Meter Reading metric – not to exceed 100 estimated bills per thousand Kansas customers.

As shown on **Exhibit 1** and **Exhibit 2**, KCP&L's Meter Reading metric for first quarter 2012 was better than the threshold in the Stipulation.

Respectfully submitted by,

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ATTORNEY FOR
KANSAS CITY POWER & LIGHT COMPANY

KCP&L
Docket No. 12-KCPE-791-CPL
Service Quality Report
First Quarter 2012

Row No.	Performance Data or Indicator	Formula (Bracketed Numbers/ Reflect Row Numbers)	2012					2011					Rolling 12-Month Performance	1st Tier Threshold		
			Jan-2012	Feb-2012	Mar-2012	Apr-2011	May-2011	Jun-2011	Jul-2011	Aug-2011	Sep-2011	Oct-2011			Nov-2011	Dec-2011
Call Center Performance Data																
Combined Operations for All Call Centers Serving Kansas Retail Customers																
0	Call Center Staffing Level		119	119	119	123	123	118	117	114	114	113	111	109	119	
1	Attempted Calls	[2]+[4]+[5]+[6]+[7]+[8]	286,201	273,187	276,562	256,573	273,722	413,180	364,295	538,298	367,849	342,825	308,073	281,530	4,004,297	
2	Blocked calls, including courtesy response calls		3819	2582	2182	703	869	6473	1631	6033	3747	4392	2377	2290	37,102	
3	Received calls	[1]-[2]-[4]+[5]+[6]+[7]+[8]	282,382	270,605	274,380	255,872	274,853	406,705	362,664	532,263	364,102	338,433	305,696	279,240	3,967,195	
4	Net HVCA answered calls (self-serve)		13,426	14,981	14,828	24,226	23,848	104,270	58,004	157,777	24,331	17,368	21,024	15,311	491,394	
5	IVR answered calls (self-serve)		106,444	98,443	92,842	75,243	81,540	94,434	103,914	127,191	123,271	117,062	104,068	104,330	1,228,802	
6	IVR abandoned calls		31,396	29,911	32,681	26,860	28,192	37,812	35,698	50,166	41,620	39,649	38,373	31,089	423,447	
7	Agent answered calls		125,840	121,766	130,156	127,304	136,495	161,599	156,586	200,269	167,416	158,608	135,510	122,416	1,744,165	
8	Agent abandoned calls		5,276	5,504	3,873	2,039	2,778	8,590	8,462	16,860	7,464	5,746	6,721	6,074	79,387	
9	Total Answered Calls	[4]+[5]+[7]	245,710	235,190	237,826	226,973	243,883	360,303	318,504	483,237	315,018	293,038	260,602	242,077	3,464,361	
10	Agent answered calls answered within 20-seconds	[13] x ([7]+[8])	91,781	90,362	104,543	113,998	116,989	134,449	117,184	121,592	125,914	129,840	100,984	89,943	1,337,579	
11	Call blockage rate, CBR%	([2]/[1]) x 100%	1.33%	0.95%	0.79%	0.27%	0.32%	1.57%	0.45%	1.08%	1.02%	1.28%	0.77%	0.81%	0.93%	<1.00%
12	Agent abandoned call rate, ACR%	([8]/([7] + [8])) x 100%	4.0%	4.3%	2.9%	1.6%	2.0%	5.0%	5.1%	7.8%	4.3%	3.5%	4.7%	4.7%	4.3%	<5.00%
13	Service level, SL (% agent answered calls answered within 20 seconds)	Recorded by CMS	70%	71%	78%	88%	84%	79%	71%	56%	72%	79%	71%	70%	73%	>67%
14	Average speed of answer of agent calls (seconds)	Recorded by CMS	42	43	26	14	18	36	48	77	42	34	45	49	41.0	<47.5 Sec.
Electric Service Performance Data																
Service Reliability																
15	Kansas Customers Served		248,199	248,275	248,227	247,568	247,551	247,379	248,034	248,002	248,080	248,052	248,218	248,223	247,984	
16	Customer interruptions, normalized per 365 Docket		4,998	9,843	10,534	14,163	11,263	50,453	41,703	31,174	8,161	8,393	9,938	11,587	232,210	
17	Customer interruption minutes, normalized per 365 Docket		537,988	978,454	750,285	1,778,663	1,344,473	15,451,346	12,444,281	20,659,926	858,855	704,681	1,107,945	1,070,279	37,687,177	
18	SAIDI - Normalized per 365 Docket (minutes per customer)	[17]/[15]	2.17	3.94	3.02	7.18	5.43	62.46	50.17	83.31	3.46	2.84	4.46	4.31	232.62	<130.0 min/customer
19	SAIFI - Normalized per 365 Docket (interruptions per customer)	[16]/[15]	0.020	0.040	0.042	0.057	0.045	0.204	0.168	0.206	0.033	0.034	0.040	0.047	0.936	<0.92
20	CAIDI - Normalized per 365 Docket (minutes per interruption)	[17]/[16] - [18]/[19]	107.64	99.41	71.23	125.59	119.37	306.25	298.40	403.72	105.24	83.96	111.49	92.37	248.43	
Service Reliability Impacted by Extraordinary Events																
16.1	Customer interruptions, normalized by Extraordinary Events		4,998	9,843	10,534	14,163	11,263	29,339	28,504	21,922	8,161	8,393	9,938	11,587	168,645	
17.1	Customer interruption minutes, normalized by Extraordinary Events		537,988	978,454	750,285	1,778,663	1,344,473	6,149,732	3,425,933	3,120,797	858,855	704,681	1,107,945	1,070,279	21,828,085	
18.1	SAIDI - Normalized by Extraordinary Events	[17.1]/[16.1]	2.17	3.94	3.02	7.18	5.43	24.86	13.81	12.58	3.46	2.84	4.46	4.31	88.02	<130.0 min/customer
19.1	SAIFI - Normalized by Extraordinary Events	[16.1]/[16.1]	0.020	0.040	0.042	0.057	0.045	0.119	0.115	0.088	0.033	0.034	0.040	0.047	0.680	<0.92
20.1	CAIDI - Normalized by Extraordinary Events	[17.1]/[16.1] - [18.1]/[19.1]	107.64	99.41	71.23	125.59	119.37	209.61	120.19	142.36	105.24	83.96	111.49	92.37	129.43	
Meter Reading & Billing																
21	Kansas meters to be read		253,622	253,984	254,071	253,129	253,264	252,818	253,093	253,027	253,399	253,670	253,523	253,890	3,041,490	
22	Meters read		252,788	253,239	253,559	252,387	252,193	252,002	252,258	252,088	252,173	253,049	252,476	252,617	3,030,829	
23	Estimated Bills	[21]-[22]	834	745	512	742	1071	816	835	939	1226	621	1047	1273	10,661	
24	Average number of customers	Month: [21]; For 12 Months: Sum([21])/12	253,265	253,406	253,458	252,887	252,953	252,971	253,003	253,014	253,047	253,096	253,118	253,170	253,458	
25	Estimated Bills per 1,000 customers, EBR	([23] x 1,000) / [24]	3.3	2.9	2.0	2.9	4.2	3.2	3.3	3.7	4.8	2.5	4.1	5.0	42.1	<100 Est. bills/1,000
Service Order Response																
All Kansas service orders																
26	Service Orders		113	97	96	104	113	128	139	98	107	133	99	107	1,608	
27	Service Orders completed within 5-days		113	97	96	104	106	126	133	93	105	133	98	104	1,582	
28	Percentage of Service Orders with 5-Days	[27]/[26]	100%	100%	100%	100%	94%	98%	97%	95%	98%	99%	99%	97%	98%	
Work Order Response																
All Kansas work requests																
29	Work Requests completed		43	36	42	38	44	36	51	38	71	71	59	47	578	
30	Work Requests completed within specified time		44	35	39	36	40	30	47	33	64	63	55	46	532	
31	Percentage of Work Requests completed within specified time	[30]/[29]	98%	97%	93%	95%	91%	83%	92%	87%	90%	89%	93%	98%	92%	

KCP&L			
Docket No. 12-KCPE-791-CPL			
Service Quality Report Summary			
First Quarter 2012			
Performance Area	Rolling 12-Month Totals	Rolling 12-Month Totals Reflecting Impact of Extraordinary Events	1st Tier Threshold
Call Center Operations			
Call Blockage Rate, CBR (%)	0.93%		<1.00%
Agent Abandoned Call Rate, ACR (%)	4.35%		<5.00%
Service Level, SL (% agent answered calls answered within 20 seconds)	73%		>67%
Average Speed of Answer of Agent Calls, ASA (seconds)	41.0		<47.5 Sec.
Electric Service Operations			
SAIDI - Normalized (minutes per customer)	232.6	88.0	<130.0 min/customer
SAIFI - Normalized (interruptions per customer)	0.936	0.680	<0.92
CAIDI - Normalized (minutes per interruption)	248.4	129.4	None
Meter Reading & Billing			
Estimated Bills per 1,000 customers, EBR	42.1		<100 Est. bills/1,000 customers
Other			
Percentage of Service Orders with 5-days	98%		None
Percentage of Work Requests completed within specified time	92%		None

VERIFICATION

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

The undersigned, Mary Britt Turner, upon oath first duly sworn, states that she is the Director, Regulatory Affairs of Kansas City Power & Light Company, that she has reviewed the foregoing Report, 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.

Mary Britt Turner

Mary Britt Turner
Director, Regulatory Affairs
Kansas City Power & Light Company

Subscribed and sworn to before me this 30th day of April, 2012.

Carla Lomax

Notary public

My commission expires:

April 6, 2015

