

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

OCT 31 2012

In the Matter of Kansas City Power & Light)
Company's Compliance Filings as Required)
by Commission Order Dated September 17,) Docket No. 12-KCPE-791-CPL
2008 in Docket No. 07-KCPE-1064-ACQ)
by
State Corporation Commission
of Kansas

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

COMES NOW Kansas City Power & Light Company ("KCP&L" or "Company") and files its *Report of Quality Assurance Performance Metrics for the Third 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

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

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 ending with fourth quarter 2011 have been made under the original Docket No. 07-KCPE-1064-ACQ with a heading showing the CPL-1 sub-docket. Beginning with the first quarter 2012 report, KCP&L initiated 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 placed in both the 1064 Docket and the new compliance docket reflecting the change.

Center metrics, and Meter Reading metrics. Consistent with the requirements of the Stipulation, attached hereto as **Exhibit 1** and **Exhibit 2**, respectively, are KCP&L's *Service Quality Report* and KCP&L's *Quarterly Service Quality Report Summary Report* for third quarter 2012 and the rolling 12-month period of October 1, 2011 through September 30, 2012.

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 0.920 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.

Normalization Impacts on KCP&L Third Quarter 2012 Reliability Metrics

BACKGROUND

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 For KCP&L, 10% of its Kansas customers would be approximately 24,100 customers.⁴ 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.”⁵ The latter events (those affecting greater than 10,000 KCP&L Kansas customers but less than 24,100 KCP&L Kansas customers) are not normalized under the 365 Docket requirements. Therefore, the normalization requirement under the 365 Docket does not fully recognize the effect of severe storms that impact KCP&L’s service territory. As a result, the Stipulation also provides for the Company to present evidence of Extraordinary Events as defined within the Stipulation and to normalize such events within the quality of service metrics for purposes of compliance with the Stipulation.⁶ 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 1, KCP&L

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

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

⁴ See Section 2 Summary, column (iii), line 10, Minimum Filing Requirements, Docket No. 12-KCPE-764-RTS, filed Apr. 20, 2012.

⁵ *Id.*, Attachment A, item 6(a), page 7 of 10.

⁶ Joint Motion and Settlement Agreement dated February 28, 2008 filed in Docket No. 07-KCPE-1064-ACQ, Attachment 2, page 4.

will have the opportunity to present evidence of an extraordinary event as part of the applicable quarterly report, attaching supporting documentation as previously described.⁷

The Stipulation allows for consideration of the impact of Extraordinary Events should KCP&L's service performance become inferior to the service metrics of any of the specified performance indicators.

THIRD QUARTER 2012 RESULTS

Normalization and Reporting Events per 365 Docket

No storm events during third 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 under the provisions of the 365 Docket. For the 2012 reporting period included in the 12-month rolling average (January 1, 2012 through September 30, 2012), no KCP&L storm events met the criteria for a 365 Docket normalization or reporting event.

Extraordinary Events per Stipulation

KCP&L had a Class III storm event on August 8, 2012;⁸ however, no events, storm or otherwise, during third quarter 2012 are being claimed by KCP&L as Extraordinary Events affecting SAIDI, SAIFI or CAIDI metrics. For the 2012 reporting period included in the 12-month rolling average (January 1, 2012 through September 30, 2012), KCP&L is not claiming any Extraordinary Events under the Stipulation.⁹

⁷ *Id.*

⁸ Class III storms are defined as storms affecting between 15,000 and 49,999 KCP&L customers systemwide. The August 8, 2012 storm affected 6,520 KCP&L Kansas customers and 27,235 KCP&L Missouri customers.

⁹ Pursuant to the Stipulation, KCP&L documents 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**.

Reliability Metric Results

As can be seen in **Table 1** below, the third quarter 2012 and the 12-month rolling average ending September 30, 2012 SAIDI, SAIFI and CAIDI results do not include any claims for Extraordinary Events. **Table 1** highlights the impact of the lack of severe storms in the third quarter of 2012 and the 12-month rolling average Kansas reliability metrics all of which are below the thresholds set in the Stipulation.

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
3rd Qtr 2012	24.59	24.59	0.230	0.230	106.95	106.95
12-Month Rolling Performance through September 2012	66.00	66.00	0.614	0.614	107.42	107.42
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.

^b SAIDI, SAIFI and CAIDI calculated excluding certain Extraordinary Events as allowed under the Stipulation.

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

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.

KCP&L Customer Call Center Metrics

KCP&L tracks four Customer Call Center metrics on a KCP&L system-wide basis for purposes of this report:¹⁰ Call Blockage Rate (“CBR”), Agent Abandoned Call Rate (“ACR”), Service Level (“SL”), which is the percent of agent-answered calls answered within 20 seconds, and Average Speed of Answer of Agent Calls (“ASA”). The Stipulation sets a threshold for the Company’s CBR metric for the calendar year for its Total Company customers - not to exceed 1.00 percent. The Stipulation sets a threshold for the Company’s ACR metric for the calendar year for its Total Company customers - not to exceed 5.00 percent. The Stipulation sets a threshold for the Company’s SL metric for the calendar year for its Total Company customers - not less than 67.0 percent. The Stipulation sets a threshold for the Company’s ASA metric for the calendar year for its Total Company customers - not to exceed an average of 47.5 seconds.

The Stipulation’s provisions regarding normalization of Extraordinary Events also apply to the Company’s Customer Call Center metrics. The Company is not claiming any specific Extraordinary Events affecting its Customer Call Center metrics for the period January 1, 2012 through September 30, 2012; however, the Company is experiencing a problem with a payment provider that is affecting the CBR. This vendor makes payments for customers by calling in credit card payments. The manner in which these calls are made floods the Company’s Interactive Voice Response (“IVR”) system, and the capacity to handle calls, with automated calls over a very short period during the middle of the night. Such a practice makes it impossible for the Company to respond to

¹⁰ KCP&L does not track Customer Call Center metrics on a Kansas-only basis. To do so would be difficult and time-consuming. The Stipulation threshold measures are based upon Total Company Customer Call Center metrics.

all of the calls during this period in a timely fashion. The Company continues to work on this problem with the vendor and our system; however, the Company has no direct business relationship with the vendor, and an adequate solution has not yet been found. As can be seen in **Table 2** below, the third quarter 2012 and the 12-month rolling average ending September 30, 2012 CBR, ACR, SL and ASA results do not include any claims for Extraordinary Events, and all except the third quarter 2012 ASA and ACR are within the thresholds set by the Stipulation.¹¹ The ASA and ACR on a 12-month rolling average are within the threshold set by the Stipulation.¹²

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
3Q 2012	0.93%	---	61%	---	61 Sec.	---	6.07%	---
12-Month Rolling Performance through 9/30/2012	0.93%	---	70%	---	45 Sec.	---	4.60%	---
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.

^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.

¹¹ As with the reliability metrics, additional rows, Rows 1.1, 1.2, 2.1, 7.1, 8.1 and 10.1 through 14.1, 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** to allow easy evaluation and comparison of the data with and without consideration the Extraordinary Events.

¹² The Stipulation thresholds for compliance purposes are measured against the annual (calendar year) values for the various metrics. The quarterly and 12-month rolling average metrics are provided throughout the year as information only.

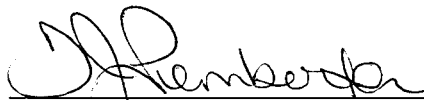
KCP&L Meter Reading Metrics

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.

The Stipulation's provisions regarding normalization of Extraordinary Events also apply to the Company's Meter Reading metrics. The Company is not claiming any Extraordinary Events affecting its Meter Reading metrics for the period January 1, 2012 through September 30, 2012. As shown on **Exhibit 1** and **Exhibit 2**, at 51 estimated bills per 1,000 Kansas customers, KCP&L's Meter Reading metric for the 12-month rolling average ended September 30, 2012 was better than the threshold in the Stipulation.

Respectfully submitted by,

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ATTORNEYS FOR KANSAS CITY
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KCP&L
Docket No. 12-KCPE-791-CPL
Service Quality Report
Third Quarter 2012

Row No	Performance Data or Indicator	Formula (Bracketed Numbers) Reflect Row Numbers	2012										2011			Rolling 12-Month Performance	1st Tier Penalty Threshold
			Jan-2012	Feb-2012	Mar-2012	Apr-2012	May-2012	Jun-2012	Jul-2012	Aug-2012	Sep-2012	Oct-2011	Nov-2011	Dec-2011			
Call Center Performance Data																	
<i>Combined Operations for All Call Centers Serving Kansas Retail Customers</i>																	
0	Call Center Staffing Level		119	119	119	116	116	115	115	116	115	113	111	109	115		
1	Attempted Calls	[2]+[4]+[5]+[6]+[7]+[8]	286,201	273,187	276,562	268,255	296,918	299,409	336,203	401,445	344,519	342,825	308,073	281,550	3,715,127		
2	Blocked Calls, including courtesy response calls		3,819	2,582	2,182	2,683	3,136	1,166	1,844	2,261	5,987	4,392	2,377	2,290	34,719		
3	Received Calls	[1]-[2]= [4]+[5]+[6]+[7]+[8]	282,382	270,605	274,380	265,572	293,782	298,243	334,359	399,184	338,532	338,433	305,696	279,240	3,680,408		
4	Net HVCA Answered Calls (self-serve)		13,426	14,981	14,828	21,207	29,610	26,704	37,841	45,806	27,761	17,368	21,024	15,311	285,867		
5	IVR Answered Calls (self-serve)		106,444	98,443	92,842	87,624	92,470	94,064	102,357	116,407	104,400	117,062	104,068	104,350	1,220,531		
6	IVR Abandoned Calls		31,396	29,911	32,681	26,984	28,990	28,859	31,574	38,660	32,553	39,649	38,373	31,089	390,719		
7	Agent Answered Calls		125,840	121,766	130,156	125,281	137,367	142,154	156,243	184,402	161,592	158,608	135,510	122,416	1,701,335		
8	Agent Abandoned Calls		5,276	5,504	3,873	4,476	5,345	6,462	6,344	13,909	12,226	5,746	6,721	6,074	81,956		
9	Total Answered Calls	[4]+[5]+[7]	245,710	235,190	237,826	234,112	259,447	262,922	296,441	346,615	293,753	293,038	260,602	242,077	3,207,733		
10	Agent Answered Calls Answered Within 20 Seconds	[13] x ([7]+[8])	91,781	90,362	104,543	99,913	105,607	107,004	121,940	107,088	97,338	129,840	100,984	89,943	1,246,342		
11	CBR - Call Blockage Rate	([2]/[1]) x 100%	1.33%	0.95%	0.79%	1.00%	1.06%	0.39%	0.55%	0.56%	1.74%	1.28%	0.77%	0.81%	0.93%		
12	ACR - Agent Abandoned Call Rate	([8]/([7] + [8])) x 100%	4.0%	4.3%	2.9%	3.4%	3.7%	4.3%	3.9%	7.0%	3.5%	4.2%	4.7%	4.7%	4.60%		
13	SL - Service Level (% agent-answered calls answered within 20 seconds)	Recorded by CMS	70%	71%	78%	77%	74%	72%	75%	54%	56%	79%	71%	70%	70%		
14	ASA - Average Speed of Answer of Agent Calls (seconds)	Recorded by CMS	42	43	26	32	34	42	32	73	74	34	45	49	45		
Electric Service Performance Data																	
<i>Service Reliability</i>																	
15	Kansas Customers Served		248,199	248,275	248,227	248,208	248,208	248,050	248,092	248,177	248,047	248,052	248,218	248,225	248,165		
16	Customer Interruptions, normalized		4,998	9,843	10,534	5,736	20,391	14,008	18,970	19,814	18,261	8,393	9,938	11,587	152,473		
17	Customer Interruption Minutes, normalized		537,988	978,454	750,285	621,405	2,779,974	1,726,768	1,916,664	2,503,827	1,680,717	704,681	1,107,945	1,070,279	16,378,986		
18	SAIDI - System Average Interruption Duration Index - Normalized (minutes per customer)	[17]/[15]	2.17	3.94	3.02	2.50	11.20	6.96	7.73	10.09	6.78	2.84	4.46	4.31	66.00		
19	SAIFI - System Average Interruption Frequency Index - Normalized (interruptions per customer)	[16]/[15]	0.020	0.040	0.042	0.023	0.082	0.056	0.076	0.080	0.074	0.034	0.040	0.047	0.614		
20	CAIDI - Normalized (minutes per interruption)	[17]/[16] = [18.1]/[19.1]	107.64	99.41	71.23	108.33	136.33	123.27	101.04	126.37	92.04	83.96	111.49	92.37	107.42		
<i>Service Reliability Impacted by Extraordinary Events</i>																	
16.1	Customer Interruptions, normalized by Extraordinary Events		4,998	9,843	10,534	5,736	20,391	14,008	18,970	19,814	18,261	8,393	9,938	11,587	152,473		
17.1	Customer Interruption Minutes, normalized by Extraordinary Events		537,988	978,454	750,285	621,405	2,779,974	1,726,768	1,916,664	2,503,827	1,680,717	704,681	1,107,945	1,070,279	16,378,986		
18.1	SAIDI - Normalized by Extraordinary Events	[17.1]/[15]	2.17	3.94	3.02	2.50	11.20	6.96	7.73	10.09	6.78	2.84	4.46	4.31	66.00		
19.1	SAIFI - Normalized by Extraordinary Events	[16.1]/[15]	0.020	0.040	0.042	0.023	0.082	0.056	0.076	0.080	0.074	0.034	0.040	0.047	0.614		
20.1	CAIDI - Normalized by Extraordinary Events	[17.1]/[16.1] = [18.1]/[19.1]	107.64	99.41	71.23	108.33	136.33	123.27	101.04	126.37	92.04	83.96	111.49	92.37	107.42		
Meter Reading & Billing																	
21	Kansas Meters to be Read		253,622	253,984	254,071	254,078	254,302	252,642	254,447	253,217	254,770	253,670	253,523	253,890	3,046,216		
22	Meters Read		252,788	253,239	253,559	252,385	253,307	251,814	252,400	252,103	253,497	253,049	252,476	252,617	3,033,234		
23	Estimated Bills	[21]-[22]	834	745	512	1,693	995	828	2,047	1,114	1,273	621	1,047	1,273	12,982		
24	Average Number of Customers	Month: [21]; For 12 Months: Sum([21])/12	253,265	253,406	253,458	253,537	253,623	253,608	253,721	253,737	253,851	253,096	253,118	253,170	253,851		
25	EBR - Estimated Bill Rate (estimated bills per 1,000 customers)	([23] x 1,000) / [24]	3.3	2.9	2.0	6.7	3.9	3.3	8.1	4.4	5.0	2.5	4.1	5.0	51.1		
<i>Meter Reading & Billing Impacted by Extraordinary Events</i>																	
22.1	Estimated Bills because of Extraordinary Events																
23.1	Estimated Bills, normalized by Extraordinary Events																
23.1	(Total Est. Bills less Extraordinary Event Impacted Est. Bills)	[23]-[22.1]	834	745	512	1,693	995	828	2,047	1,114	1,273	621	1,047	1,273	12,982		
25.1	EBR - Estimated Bill Rate - Normalized by Extraordinary Events	([23.1] x 1,000) / [24]	3.3	2.9	2.0	6.7	3.9	3.3	8.1	4.4	5.0	2.5	4.1	5.0	51.1		
Notes:																	
(1) Where no material level of estimated bills because of Extraordinary Events occurred in a given month, Row 22.1 cells are left blank.																	
Service Order Response																	
<i>All Kansas service orders</i>																	
26	Service Orders		115	97	366	190	173	165	124	232	158	135	99	107	1,961		
27	Service Orders completed within 5 days		115	97	366	190	173	164	124	232	158	133	98	104	1,954		
28	Percentage of Service Orders Within 5 Days	[27]/[26]	100%	100%	100%	100%	100%	99%	100%	100%	100%	99%	99%	97%	100%		
<i>Work Order Response</i>																	
<i>All Kansas work requests</i>																	
29	Work Requests completed		45	36	42	58	64	55	40	52	47	71	59	47	616		
30	Work Requests completed within specified time		44	35	39	54	64	54	37	51	45	63	55	46	587		
31	Percentage of Work Requests Completed Within Specified Time	[30]/[29]	98%	97%	93%	93%	100%	98%	93%	98%	96%	89%	93%	98%	95%		

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

Performance Area	Rolling 12-Month Totals Oct 2011 through Sep 2012	Rolling 12- Month Totals Reflecting Impact of Extraordinary Events	1st Tier Penalty Threshold
Call Center Operations			
CBR - Call Blockage Rate	0.93%		<1.00%
ACR - Agent Abandoned Call Rate	4.60%		<5.00%
SL - Service Level (% agent-answered calls answered within 20 seconds)	70.00%		>67%
ASA - Average Speed of Answer of Agent Calls (seconds)	45.0		<47.5 Sec.
Electric Service Operations			
SAIDI - System Average Interruption Duration Index - Normalized (minutes per customer)	66.0		<130.0
SAIFI - System Average Interruption Frequency Index - Normalized (interruptions per customer)	0.614		<0.92
CAIDI - Customer Average Interruption Duration Index - Normalized (minutes per interruption)	107.4		None
Other			
EBR - Estimated Bill Rate (estimated bills per 1,000 customers)	51.1		<100
Percentage of Service Orders Within 5 Days	100%		None
Percentage of Work Requests Completed Within Specified Time	95%		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 Quarterly 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 31st day of October, 2012.

Nicole A. Wehry
Notary public

My commission expires:

Feb. 4, 2015

