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Kansas Corporation Commission
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**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

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)

**KANSAS CITY POWER & LIGHT COMPANY'S REPORT OF
QUALITY ASSURANCE PERFORMANCE METRICS
FOR THE FOURTH QUARTER OF 2012 AND 2012 ANNUAL REPORT
AS REQUIRED BY COMMISSION ORDER IN
DOCKET NO. 07-KCPE-1064-ACQ**

COMES NOW Kansas City Power & Light Company ("KCP&L" or "Company") and files its *Report of Quality Assurance Performance Metrics for the Fourth Quarter of 2012* and its *2012 Annual Report* ("Reports") 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 Adopt Stipulation and Agreement and Approving Agreements ("May 15 Order"), and (3) the September 17, 2008 Commission Order Ending 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 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, Docket No. 12-KCPE-791-CPL. 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.

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 *Fourth Quarter 2012 and Annual 2012 Service Quality Report* and *KCP&L's Fourth Quarter 2012 / Annual 2012 Service Quality Report Summary Report*. **Exhibit 3**, *Supportive Data of Extraordinary Events Identified in KCP&L's Fourth Quarter 2012 / Annual 2012 Service Quality Report and Fourth Quarter 2012 / 2012 Annual Service Quality Report Summary*, is also attached.

Across all areas of service quality, including Reliability, Customer Call Center, and Meter Reading metrics, KCP&L fully met all established thresholds per the Stipulation for the year 2012, with and without adjustment for Extraordinary Events.

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 informational purposes only.

Normalization Impacts on KCP&L 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 impacted 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

² See Docket No. 02-GIME-365-GIE Order dated Oct. 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.

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 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 service performance become inferior to the service metrics of any of the specified performance indicators.

FOURTH QUARTER 2012 and ANNUAL 2012 RESULTS

Normalization and Reporting Events per 365 Docket

No storm events during fourth quarter 2012 or during the calendar year 2012 met the criteria for a 365 Docket normalization event; however, one storm event occurring on December 20, 2012 was severe enough to report the event to the Commission under the provisions of the 365 Docket.⁸ This storm event clearly falls within the definition of an Extraordinary Event under the stipulation "...an event beyond the control for the utility, which shall include acts of God...lightning...storms..." (Stipulation, Attachment 2, Extraordinary Events.)

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

⁷ *Id.*

⁸ Docket No. 02-GIME-365-GIE, Kansas City Power & Light Company December 20, 2012 Storm Event Report filed Jan. 17, 2013.

Pursuant to the Stipulation, KCP&L is documenting this Extraordinary Event and its impact on KCP&L's performance as part of this Report. KCP&L has attached the referenced storm report as documentation. To more clearly represent the impact of this Extraordinary Event on reliability, additional rows, rows 16.1 through 20.1, have been incorporated into **Exhibit 1** and an additional column titled *2012 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.

Reliability Metric Results

Table 1 highlights the impact of the December 20th storm on fourth quarter 2012 and 2012 annual Kansas Reliability metrics SAIDI, SAIFI and CAIDI.⁹ As can be seen from the table, KCP&L's reliability performance was well within established thresholds with and without adjustment for the Extraordinary Event. Overall, KCP&L met the SAIDI and SAIFI Reliability Metrics thresholds for 2012.¹⁰

	SAIDI ^a	SAIDI Excluding Extraordinary Events ^b	SAIFI ^a	SAIFI Excluding Extraordinary Events ^b	CAIDI ^a	CAIDI Excluding Extraordinary Events ^b
4th Qtr 2012	18.39	9.22	0.146	0.094	125.84	98.43
12-Month Rolling Performance through December 2012	72.78	63.56	0.640	0.587	113.73	108.25
1 st Tier Threshold ^c	<130.0	<130.0	<0.920	<0.920	N/A	N/A

⁹ **Exhibit 3** provides the supporting documentation of the impact of the claimed Extraordinary Event.

¹⁰ CAIDI metrics are included in compliance with the Stipulation for informational purposes only.

^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 2012 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.

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:¹¹ 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 December 31, 2012. However, as discussed in the

¹¹ KCP&L does not track Customer Call Center metrics on a Kansas-only basis. The Stipulation threshold measures are based upon Total Company Customer Call Center metrics.

Company's Third Quarter 2012 Report, CBR was impacted by a problem with a vendor flooding the Company's Interactive Voice Response ("IVR") system with customer credit card payments in the middle of the night. The manner in which the calls are made makes it impossible for the Company to respond to all of the calls 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 fourth quarter 2012 and the 12-month rolling average ending December 31, 2012 CBR, ACR, SL and ASA results do not include any claims for Extraordinary Events, and are within the thresholds set by the Stipulation.

Table 2: KCP&L's Call Center Metrics (Total Company)								
	Blocked Call Rate ^a (CBR)	Blocked Call Rate Excluding Extraordinary Events ^b	Service Level ^a (SL)	Service Level Excluding Extraordinary Events ^b	ASA ^a	ASA Excluding Extraordinary Events ^b	Abandoned Call Rate ^a (ACR)	Abandoned Call Rate Excluding Extraordinary Events ^b
4Q 2012	0.96%	---	72%	---	47 Sec.	---	4.34%	---
12-Month Rolling Performance through 12/31/2012	0.96%	---	69%	---	46 Sec.	---	4.62%	---
1 st Tier Threshold	<1.00%	<1.00%	>67% ^c	>67% ^c	<47.5 Sec.	<47.5 Sec.	<5.00%	<5.00%

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

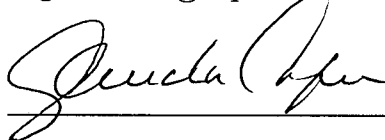
KCP&L Meter Reading Metrics

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.

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 thru December 31, 2012. As shown on **Exhibit 1** and **Exhibit 2**, at 49.5 estimated bills per 1,000 Kansas customers, KCP&L's Meter Reading metric for the 12-month rolling average ended December 31, 2012 was better than the threshold in the Stipulation.

Respectfully submitted by,

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COUNSEL FOR KANSAS CITY
POWER & LIGHT COMPANY

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

Row No.	Performance Data or Indicator	Formula <i>(Bracketed Numbers) Reflect Row Numbers</i>	2012												Rolling 12-Month Performance	1st Tier Threshold	1st Qtr.	2nd Qtr.	3rd Qtr.	4th Qtr.
			Jan-2012	Feb-2012	Mar-2012	Apr-2012	May-2012	Jun-2012	Jul-2012	Aug-2012	Sep-2012	Oct-2012	Nov-2012	Dec-2012						
Customer 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	113	112	113					
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	347,271	283,188	256,914	3,670,072					
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	3,985	4,792	699	35,136					
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	343,286	278,396	256,215	3,634,936					
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	21,835	17,843	32,173	304,015					
5	IVR Answered Calls (self-serve)		106,444	98,443	92,842	87,624	92,470	94,064	102,357	116,407	104,400	92,454	90,299	80,325	1,172,229					
6	IVR Abandoned Calls		31,396	29,911	32,681	26,984	28,990	28,859	31,574	38,660	32,553	34,330	28,594	24,782	369,314					
7	Agent Answered Calls		125,840	121,766	130,156	125,281	137,367	142,154	156,243	184,402	161,592	169,078	135,478	117,434	1,706,791					
8	Agent Abandoned Calls		5,276	5,504	3,873	4,476	5,345	6,462	6,344	13,909	12,226	11,489	6,182	1,501	82,587					
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	297,467	243,620	229,932	3,183,035					
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	102,923	104,828	109,420	1,242,747					
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%	1.15%	1.69%	0.27%	0.96%	<1.00%	1.03	0.92	0.93	0.96
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%	7.0%	6.4%	4.4%	1.3%	4.62%	<5.00%	3.7	3.8	6.07	4.34
13	SL - Service Level (% agent-answered calls answered within 20 seconds)	Recorded by CMS	70%	71%	78%	77%	74%	72%	75%	54%	56%	57%	74%	92%	69%	>67.00%	73	74	61	72
14	ASA - Average Speed of Answer of Agent Calls (seconds)	Recorded by CMS	42	43	26	32	34	42	32	73	74	73	47	9	46	<47.5 Sec	37	36	61	47
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	249,322	249,405	249,925	248,511					
16	Customer Interruptions, normalized		4,998	9,843	10,534	5,736	20,391	14,008	18,970	19,814	18,261	14,955	5,327	16,195	159,032					
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	1,622,332	419,327	2,548,506	18,086,246					
18	SAIDI - System Average Interruption Duration Index - Normalized (minutes per SAIFI)	[17]/[15]	2.17	3.94	3.02	2.50	11.20	6.96	7.73	10.09	6.78	6.51	1.68	10.20	72.78	<130.0	9.13	20.67	24.59	18.39
19	SAIFI - System Average Interruption Frequency Index - Normalized	[16]/[15]	0.020	0.040	0.042	0.023	0.082	0.056	0.076	0.080	0.074	0.060	0.021	0.065	0.640	<0.920	0.102	0.162	0.230	0.146
20	CAIDI - Normalized (minutes per interruption)	[17]/[16] = [18]/[19]	107.64	99.41	71.23	108.33	136.33	123.27	101.04	126.37	92.04	108.48	78.72	157.36	113.73		89.33	127.77	106.95	125.81
<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	14,955	5,327	3,084	145,921					
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	1,622,332	419,327	258,137	15,795,877					
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	6.51	1.68	1.03	63.56	<130.0	9.13	20.67	24.59	9.22
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	0.060	0.021	0.012	0.587	<0.920	0.102	0.162	0.230	0.094
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	108.48	78.72	83.70	108.25		89.33	127.77	106.95	98.43
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	254,866	254,837	255,057	3,049,893					
22	Meters Read		252,788	253,239	253,559	252,385	253,307	251,814	252,400	252,103	253,497	254,004	253,778	254,450	3,037,324					
23	Estimated Bills	[21]-[22]	834	745	512	1,693	995	828	2,047	1,114	1,273	862	1,059	607	12,569					
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	253,951	253,118	253,170	254,158					
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	3.4	4.2	2.4	49.5	<100				
Service Order Response																				
<i>All Kansas service orders</i>																				
26	Service Orders		115	97	366	190	173	165	124	232	158	154	158	158	2,090					
27	Service Orders completed within 5 days		115	97	366	190	173	164	124	232	158	154	158	158	2,089					
28	Percentage of Service Orders Within 5 Days	[27]/[26]	100%	100%	100%	100%	100%	99%	100%	100%	100%	100%	100%	100%	100%					
Work Order Response																				
<i>All Kansas work requests</i>																				
29	Work Requests completed		45	36	42	58	64	55	40	52	47	57	46	51	593					
30	Work Requests completed within specified time		44	35	39	54	64	54	37	51	45	55	44	49	571					
31	Percentage of Work Requests Completed Within Specified Time	[30]/[29]	98%	97%	93%	93%	100%	98%	93%	98%	96%	96%	96%	96%	96%					

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

Performance Area	Rolling 12-Month Totals Jan 2012 through Dec 2012	Rolling 12- Month Totals Reflecting Impact of Extraordinary Events	1st Tier Threshold
Customer Call Center Operations			
CBR - Call Blockage Rate	0.96%		<1.00%
ACR - Agent Abandoned Call Rate	4.62%		<5.00%
SL - Service Level (% agent-answered calls answered within 20 seconds)	69%		>67.00%
ASA - Average Speed of Answer of Agent Calls (seconds)	46		<47.5 Sec.
Electric Service Operations			
SAIDI - System Average Interruption Duration Index - Normalized (minutes per customer)	72.8	63.56	<130.0
SAIFI - System Average Interruption Frequency Index - Normalized (interruptions per customer)	0.640	0.587	<0.920
CAIDI - Customer Average Interruption Duration Index - Normalized (minutes per interruption)	113.7	108.25	None
Other			
EBR - Estimated Bill Rate (estimated bills per 1,000 customers)	49.5		<100
Percentage of Service Orders Within 5 Days	100%		None
Percentage of Work Requests Completed Within Specified Time	96%		None



To: Kansas Corporation Commission (Commission” or “KCC”) Staff

RE: **Exhibit 3** – Supportive Data for Extraordinary Events Identified in KCP&L’s Fourth Quarter 2012 / Annual 2012 Service Quality Report and Fourth Quarter 2012 / Annual 2012 Service Quality Report Summary

KCC Docket No. 12-KCPE-791-CPL

KCP&L’s *Report of Quality Assurance Performance Metrics for the Fourth Quarter of 2012 and 2012 Annual Report* (“Reports”) submitted to the Commission on January 31, 2013 in compliance with the Commission’s Order in Docket No. 07-KCPE-1064-ACQ (“1064 Docket”) consistent with the requirements of the Stipulation¹ highlights the impact of storm events on KCP&L’s Kansas Reliability metrics, Company Customer Call Center metrics and the KCP&L Kansas Meter Reading metric.

As required by the Stipulation and Agreement in the 1064 Docket (“1064 S&A”), KCP&L is providing supporting information for one Extraordinary Event occurring in 2012 and noted in the Report in regard to its Reliability metrics. The Extraordinary Event in question was reported to the Commission as required under the Commission’s October 4, 2004 Order in Docket No. 02-GIME-365-GIE. The report filed with the Commission for this event is attached hereto as KCP&L’s supporting documentation.

- Kansas City Power & Light Company December 20, 2012 Storm Event Report filed January 17, 2013.
<http://estar.kcc.ks.gov/estar/ViewFile.aspx?Id=9dee3bc5-0943-4642-a0fb-cf13df1a4d5c>

Definition of Extraordinary Event

Under the 1064 S&A, the term “Extraordinary Event” is defined as follows:

[A]n event beyond the control of the utility, which shall include acts of God,...lightning,...storms, floods, washouts,...acts, orders, laws or regulations of government authority, breakage or accident to machinery or lines of pipe or electric supply lines, major events causing electric service interruptions of the magnitude defined by the Commission’s Electric Reliability Requirements Rule 3(n), other than those caused by the utility’s negligence, the necessity for making repairs or alterations to machinery, equipment or lines of pipe, freezing lines of pipe or electric supply lines, which could not have been prevented by the utility’s use of standard and

¹ The Stipulation requires each fourth quarter report to be filed by January 31st of the following year.



customary industry practice, ...or otherwise beyond the control of the utility. If, using standard and customary industry practice, the utility could have avoided the extraordinary event, then the impact of such event will be considered in the measurement of the performance of the utility.

The Commission's Electric Reliability Requirements ("ERR") Rule 3(n) included under KCC Docket No. 02-GIME-365-GIE ("365 Docket") defines a "Major Event" as:

"...a catastrophic event caused by forces exceeding the design limits required by codes and regulations, and characterized by extensive damage to the electric power system and sustained interruptions to more than 10% of a utility's customers within a 24-hour period." (ERR, p. 2, para. (n).)

Applying the Major Event definition criteria to the Kansas service area, a Major Event would require 24 hours of sustained interruption to approximately 24,100 Kansas customers —10 percent of 241,000 Kansas customers.

Notably, a Major Event, as defined under the 365 Docket is included as a single item in the list of items which can be considered extraordinary events under the 1064 S&A. Therefore, under the 1064 S&A, all Major Events would be classified as Extraordinary Events but not all Extraordinary Events will meet the definition of a Major Event.

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 January, 2013.

Carla Lomax

Notary public

CARLA LOMAX
Notary Public - Notary Seal
State of Missouri
Commissioned for Clay County
My Commission Expires: April 06, 2015
Commission Number: 11169285

My commission expires:

April 6, 2015
