

JUL 31 2012

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

by
State Corporation Commission
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 SECOND 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 Second 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 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 filed 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 *Quarterly 2012 Service Quality Report* and *KCP&L's Quarterly Service Quality Report Summary* for second quarter 2012 and the rolling 12-month period of July 1, 2011 through June 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 Second 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 during the reporting period. 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 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.⁶

No storm events during second 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

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.

⁶ *Id.*

rolling average (July 1, 2011 thru December 31, 2011), no KCP&L storm events met the criteria for a 365 Docket normalization event; however, two 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.

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. The second quarter 2012 and the cumulative impact of the storms occurring during the third quarter 2011 on the 12-month rolling average ending June 30, 2012 on the SAIDI, SAIFI and CAIDI⁸ are summarized in **Table 1** below.

Table 1 highlights the impact of the lack of storms in the second quarter of 2012 and the 12-month rolling average Kansas reliability metrics both with 365 Docket only

⁷ Docket No. 02-GIME-365-GIE, *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 **Exhibit 3** provides the supporting documentation of the impact of the claimed Extraordinary Events.

normalization exclusions and with the normalization exclusions of additional Extraordinary Events during the period. **Exhibit 3** provides the supporting documentation of the impact of the identified Events on KCP&L's reliability performance for the 12-month rolling average period.

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
2nd Qtr 2012	20.11	20.11	0.156	0.156	128.96	128.96
12-Month Rolling Performance through June 2012	178.28	71.26	.792	.621	225.18	114.82
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 third quarter 2011 report incorrectly identified storm events on 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: 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.

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. 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. 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. 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. 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 the first half of 2012 are better than each of the thresholds set in the Stipulation.

	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
2Q 2012	0.9%	---	74%	---	37 Sec.	---	3.73%	---
12-Month Rolling Performance through 6/30/2012	0.92%	---	71%	---	44 Sec.	---	4.56%	---
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 normalize 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.

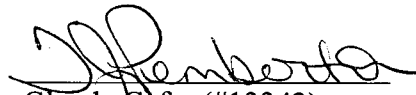
KCP&L Meter Reading Metrics

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 second quarter 2012 was better than the threshold in the Stipulation.

Respectfully submitted by,

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

Row No	Performance Data or Indicator	Formula <i>[Bracketed Numbers] Reflect Row Numbers</i>	2012						2011						Rolling 12-Month Performance	1st Tier Penalty Threshold
			Jan-2012	Feb-2012	Mar-2012	Apr-2012	May-2012	Jun-2012	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	116	116	115	117	114	114	113	111	109	115	
1	Attempted Calls	[2]+[4]+[5]+[6]+[7]+[8]	286201	273187	276562	268255	296918	299409	364295	558298	367849	342825	308073	281530	3,923,402	
2	Blocked calls, including courtesy response calls		3819	2582	2182	2683	3136	1166	1631	6035	3747	4392	2377	2290	36,040	
3	Received calls	[1]-[2]= [4]+[5]+[6]+[7]+[8]	282382	270605	274380	265572	293782	298243	362664	552263	364102	338433	305696	279240	3,887,362	
4	Net HVCA answered calls (self-serve)		13426	14981	14828	21207	29610	26704	58004	157777	24331	17368	21024	15311	414,571	
5	IVR answered calls (self-serve)		106444	98443	92842	87624	92470	94064	103914	127191	123271	117062	104068	104350	1,251,743	
6	IVR abandoned calls		31396	29911	32681	26984	28990	28859	35698	50166	41620	39649	38373	31089	415,416	
7	Agent answered calls		125840	121766	130156	125281	137367	142154	156586	200269	167416	158608	135510	122416	1,723,369	
8	Agent abandoned calls		5276	5504	3873	4476	5345	6462	8462	16860	7464	5746	6721	6074	82,263	
9	Total Answered Calls	[4]+[5]+[7]	245710	235190	237826	234112	259447	262922	318504	485237	315018	293038	260602	242077	3,389,683	
10	Agent answered calls answered within 20-seconds	[13] x ([7]+[8])	91781	90362	104543	99913	105607	107004	117184	121592	125914	129840	100984	89943	1,284,665	
11	Call blockage rate, CBR%	([2]/[1]) x 100%	1.33%	0.95%	0.79%	1.00%	1.06%	0.39%	0.45%	1.08%	1.02%	1.28%	0.77%	0.81%	0.92%	
12	Agent abandoned call rate, ACR%	([8]/([7] + [8]) x 100%	4.0%	4.3%	2.9%	3.4%	3.7%	4.3%	5.1%	7.8%	4.3%	3.5%	4.7%	4.7%	4.56%	
13	Service level, SL (% agent answered calls answered within 20 seconds)	Recorded by CMS	70%	71%	78%	77%	74%	72%	71%	56%	72%	79%	71%	70%	71.00%	
14	Average speed of answer of agent calls (seconds)	Recorded by CMS	42	43	26	32	34	42	48	77	42	34	45	49	44.0	
Electric Service Performance Data																
<i>Service Reliability</i>																
15	Kansas Customers Served		248199	248275	248,227	248,208	248,208	248,050	248,034	248,002	248,080	248,052	248,218	248,225	248,148	
16	Customer interruptions, normalized		4998	9843	10,534	5,736	20,391	14,008	41,703	51,174	8,161	8,393	9938	11587	196,466	
17	Customer interruption minutes, normalized		537988	978454	750,285	621,405	2,779,974	1,726,768	12,444,281	20,659,926	858,855	704,681	1107945	1070279	44,240,841	
18	SAIDI - Normalized (minutes per customer)	[17]/[15]	2.17	3.94	3.02	2.50	11.20	6.96	50.17	83.31	3.46	2.84	4.46	4.31	178.28	
19	SAIFI - Normalized (interruptions per customer)	[16]/[15]	0.020	0.040	0.042	0.023	0.082	0.056	0.168	0.206	0.033	0.034	0.040	0.047	0.792	
20	CAIDI - Normalized (minutes per interruption)	[17]/[16] = [18]/[19]	107.64	99.41	71.23	108.33	136.33	123.27	298.40	403.72	105.24	83.96	111.49	92.37	225.18	
<i>Service Reliability Impacted by Extraordinary Events</i>																
16.1	Customer interruptions, normalized by Extraordinary Events		4998	9843	10534	5,736	20,391	14,008	28,504	21,922	8,161	8,393	9938	11587	154,015	
17.1	Customer interruption minutes, normalized by Extraordinary Events		537988	978454	750285	621,405	2,779,974	1,726,768	3,425,933	3,120,797	858,855	704,681	1107945	1070279	17,683,364	
18.1	SAIDI - Normalized by Extraordinary Events	[17.1]/[15]	2.17	3.94	3.02	2.50	11.20	6.96	13.81	12.58	3.46	2.84	4.46	4.31	71.26	
19.1	SAIFI - Normalized by Extraordinary Events	[16.1]/[15]	0.020	0.040	0.042	0.023	0.082	0.056	0.115	0.088	0.033	0.034	0.040	0.047	0.621	
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	120.19	142.36	105.24	83.96	111.49	92.37	114.82	

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-2011	Aug-2011	Sep-2011	Oct-2011	Nov-2011	Dec-2011		
Meter Reading & Billing																
21	Kansas meters to be read		253,622	253,984	254,071	254,078	254,302	252,642	253,093	253,027	253,399	253,670	253,523	253,890	3,043,301	
22	Meters read		252,788	253,239	253,559	252,385	253,307	251,814	252,258	252,088	252,173	253,049	252,476	252,617	3,031,753	
23	Estimated Bills	[21]-[22]	834	745	512	1693	995	828	835	939	1226	621	1047	1273	11,548	
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	253,003	253,014	253,047	253,096	253,118	253,170	253,608	
25	Estimated Bills per 1,000 customers, EBR	([23] x 1,000) / [24]	3.3	2.9	2.0	6.7	3.9	3.3	3.3	3.7	4.8	2.5	4.1	5.0	45.5	< 100 Est. bills/1,000
<i>Meter Reading & Billing Impacted by Extraordinary Events</i>																
22.1	Estimated Bills because of Extraordinary Events															
23.1	Est. Bills, normalized by Extraordinary Events (Total Est. Bills less Extraordinary Event Impacted Est. Bills)	[23]-[22.1]	834	745	512	1693	995	828	835	939	1226	621	1047	1273	11,548	
25.1	Estimated Bills per 1,000 customers, EBR, normalized by Extraordinary Events	([23.1] x 1,000) / [24]	3.3	2.9	2.0	6.7	3.9	3.3	3.3	3.7	4.8	2.5	4.1	5.0	45.5	< 100 Est. bills/1,000
Notes:																
b Where no material level of estimated bills because of Extraordinary Events occurred in a give month, Row 22.1 cells are left blank.																
Service Order Response																
All Kansas service orders																
26	Service Orders		115	97	366	190	173	165	139	98	107	135	99	107	1,791	
27	Service Orders completed within 5-days		115	97	366	190	173	164	135	93	105	133	98	104	1,773	
28	Percentage of Service Orders with 5-days	[27]/[26]	100%	100%	100%	100%	100%	99%	97%	95%	98%	99%	99%	97%	99%	
Work Order Response																
All Kansas work requests																
29	Work Requests completed		45	36	42	58	64	55	51	38	71	71	59	47	637	
30	Work Requests completed within specified time		44	35	39	54	64	54	47	33	64	63	55	46	598	
31	Percentage of Work Requests completed within specified time	[30]/[29]	98%	97%	93%	93%	100%	98%	92%	87%	90%	89%	93%	98%	94%	

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

Performance Area	Rolling 12-Month Totals	Rolling 12-Month Totals Reflecting Impact of Extraordinary Events	1st Tier Penalty Threshold
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Call Center Operations

Call blockage rate, CBR%	0.92%		< 1.00%
Agent abandoned call rate, ACR%	4.56%		< 5.00%
Service level, SL (% agent answered calls answered within 20 seconds)	71.00%		> 67.00%
Average speed of answer of agent calls (seconds)	44.0		< 47.5 Sec.

Electric Service Operations

SAIDI - Normalized (minutes per customer)	178.3	71.3	< 130.0 min/customer
SAIFI - Normalized (interruptions per customer)	0.792	0.621	< 0.92
CAIDI - Normalized (minutes per interruption)	225.2	114.8	None
Estimated Bills per 1,000 customers, EBR	45.5	45.5	< 100 Est. bills/1,000
Percentage of Service Orders within 5-days	99%		None
Percentage of Work Requests completed within specified time	94%		None