BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

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

COMPLIANCE FILING

COME NOW Kansas City Power & Light Company ("KCP&L"), Westar Energy, Inc. and Kansas Gas and Electric Company ("KG&E") (collectively referred to herein as "Westar;" and all collectively referred to herein as "Companies"), and submit this compliance filing, as required by the Order of the State Corporation Commission of the State of Kansas ("Commission") issued in Docket No. 18-KCPE-095-MER ("18-095 Docket") on May 24, 2018 ("Merger Order"). In its Merger Order the Commission approved the Non-Unanimous Settlement Agreement submitted on March 7, 2018, by certain parties to the 18-095 Docket ("Settlement Agreement"). Attachment A to the Settlement Agreement contains Merger Conditions, some of which require the Companies to make post-merger filings with the Commission. Certain of these filings will be submitted in this docket established for that purpose.

1. Merger Condition 36 provides as follows:

> Service Quality and Reliability Performance Standards: KCP&L and Westar will report the particular performance metrics as set forth in Exhibits BA-4 and BA-5 of the direct testimony of Bruce Akin. Exhibits BA-1 through BA-5 are provided in Attachment 4 to the Settlement Agreement. **KCP&L and Westar will also provide the reports described in Attachment 5 to the Settlement Agreement.** Changes to future reporting can be made, as mutually agreed upon by Applicants, Staff and CURB.

2. In accordance with Merger Condition 36, specifically those in reference to "Attachment 5 to the Settlement Agreement," the Companies hereby submit to the Commission the following attachments:

Attachment A: Additional Quality of Service Commitments Reporting

Respectfully submitted,

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COUNSEL FOR KANSAS CITY POWER & LIGHT COMPANY, WESTAR ENERGY, INC., AND KANSAS GAS AND ELECTRIC COMPANY

VERIFICATION

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

The undersigned, Darrin R. Ives, upon oath first duly sworn, states that he is the Vice President of Regulatory Affairs of KCP&L and Westar, that he has reviewed the foregoing pleading, that he is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of his knowledge and belief.

Darrin R. Ives
Vice President, Regulatory Affairs

Subscribed and sworn to before me this 29th day of March 2019.

Notary Public

My appointment expires: 4/26/2021

ANTHONY R WESTENKIRCHNER
Notary Public, Notary Seal
State of Missouri
Platte County
Commission # 17279952
My Commission Expires April 26, 2021

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above was electronically served, hand-delivered or mailed, postage prepaid, this 29th day of March 2019 to:

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/s/ Robert J. Hack
Robert J. Hack

Kansas Corporation Commission
Docket 19-KCPE-178-CPL
Kansas City Power & Light and Westar Energy
Commitment 36 – Attachment 5 – Additional Reporting
Annual Report

Background

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

Commitment No. 36:

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

Attachment 5: Applicants Additional Quality of Service Commitments

A. Applicants will provide Staff with the annual normalized year-end SAIDI, SAIFI, and CAIDI results for both KCP&L and Westar within 90 days of the end of the calendar year and will compare those results to the 5-year annual normalized average (2012-2016) for each individual metric. If the actual results of any individual metric vary substantially from the 5-year average, then Applicants will provide a high-level summary of the reasons why such degradation occurred.

B. Present IT system consolidation updates to Staff annually during the moratorium period related to:
   - Outage Management System (OMS)
   - Energy Management System (EMS)
   - Geographic Information System (GIS)
   - Enterprise Asset Management (EAM)

C. Reliability Reporting Criteria:(Additional reporting during the moratorium period)
   C1) Provide vegetation management reporting including
   a. Miles/acres cleared
   b. Cycles and off cycle clearing
   c. Outages related to vegetation
   d. Actual dollars spent versus budgeted dollars
   e. Dollars per mile/acre cleared

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

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

C3) Provide summary results of transmission system patrols

2018 Quality of Service Reliability Statistics

Kansas City Power & Light Company
Reliability Data
2018

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Year to Date
IEEE 1366 Normalized SAIDI	3.17	5.94	3.94	2.33	5.24	5.16	8.73	7.24	3.65	4.58	2.11	6.07	58.16
IEEE 1366 Normalized SAIFI	0.039	0.089	0.064	0.023	0.040	0.054	0.083	0.090	0.038	0.048	0.024	0.083	0.675
IEEE 1366 Normalized CAIDI	81.28	66.74	61.56	101.30	131.00	95.56	105.18	80.44	96.05	95.42	87.92	73.13	86.16

Westar Energy, Inc
Reliability Data
2018

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Year to Date
IEEE 1366 Normalized SAIDI	3.78	5.53	6.12	7.51	12.64	13.63	8.95	15.18	4.49	9.58	5.19	3.83	96.43
IEEE 1366 Normalized SAIFI	0.047	0.064	0.059	0.086	0.118	0.108	0.098	0.128	0.054	0.111	0.059	0.044	0.976
IEEE 1366 Normalized CAIDI	80.47	86.44	104.21	87.78	107.45	126.31	91.24	118.30	82.86	86.13	87.80	87.17	98.82 *

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

2012-2016 Quality of Service Reliability Statistics

Kansas City Power & Light Company

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

Westar Engergy, Inc.

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

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

**Westar CAIDI is higher in 2018 than the 2012-2016 period due to a larger improvement in SAIFI than was experienced in SAIDI. The SAIFI improvement was (1.311 - 0.976)/1.311 = 25.6% whereas the SAIDI improvement was (122.02 - 96.43)/122.02 = 21.0%.*

B. IT System Consolidation

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

C(1). Vegetation Management Reporting

a) Annual Tree Trimming Expenditures

Distribution System:

Vegetation Management Budget vs Actual Distribution System - KS				
Year	**Budget**		**Actual**	
	Westar	**KCP&L-KS**	**Westar**	**KCP&L-KS**
2018	$25,000,000	$6,209,580	$23,096,163	$5,925,279

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

Transmission System:

Vegetation Management Budget vs Actual Transmission System - KS				
Year	**Budget**		**Actual**	
	Westar	**KCP&L-KS**	**Westar**	**KCP&L-KS**
2018	$2,000,000	$986,668	$2,001,367	$912,759

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

b) Annual Expenditures: Scheduled and Non-Scheduled

Distribution System:

Vegetation Management Scheduled vs Non-Scheduled Expenditures Distribution System - KS				
Year	**Scheduled**		**Non-Scheduled**	
	Westar	**KCP&L-KS**	**Westar**	**KCP&L-KS**
2018	$19,631,566	$4,166,558	$3,464,597	$1,758,721

Costs include contracted program management, labor and equipment.

Transmission System:

Vegetation Management Scheduled vs Non-Scheduled Expenditures Transmission System - KS				
Year	Scheduled		Non-Scheduled	
	Westar	KCP&L-KS	Westar	KCP&L-KS
2018	$1,843,819	$328,593	$157,548	$584,166

Costs include contracted program management, labor and equipment.

c) Annual Miles Trimmed and/or Cleared

Annual Mileage Trimmed/Cleared Transmission and Distribution Systems - KS				
Year	Transmission		Distribution	
	Westar	KCP&L-KS	Westar	KCP&L-KS
2018	1,218	145	3,366	1,164

d) Annual Cost per Mile

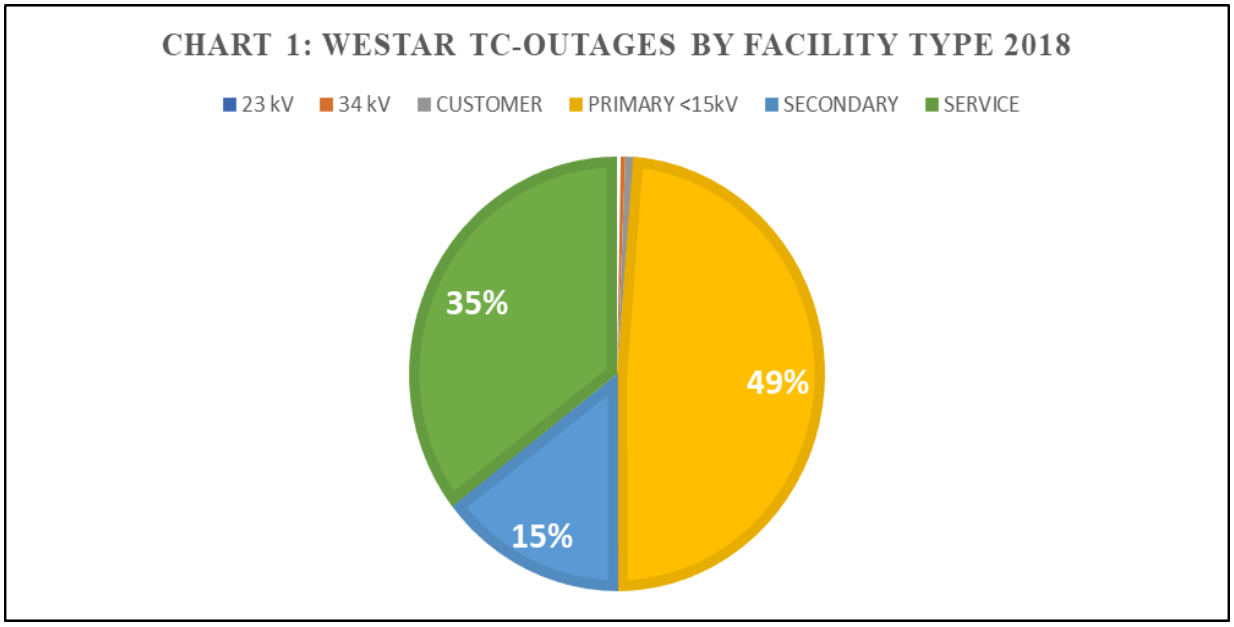
Annual Dollars per Mile Expenditures Transmission and Distribution Systems - KS				
Year	Transmission		Distribution	
	Westar	KCP&L-KS	Westar	KCP&L-KS
2018	$1,514	$2,266	$5,831	$3,577

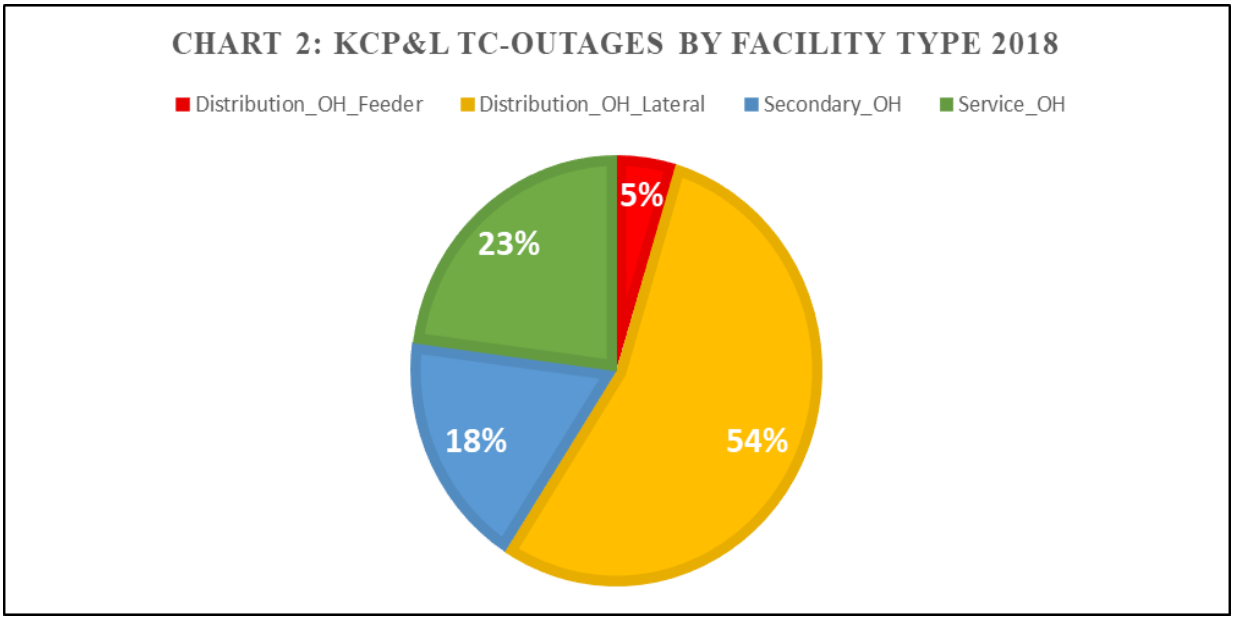
e) Outages Related to Vegetation: 2018 Un-Normalized

Tree Caused Outages by Service Center Totals Distribution System – KS			
2018 Westar: Tree-Caused Outages by Service Center		2018 KCP&L: Tree-Caused Outages by Service Center	
Service Center	Outages	Service Center	Outages
Abilene	41	Johnson County	609
Arkansas City	56	Ottawa/Paola	129
Atchison	72	Southland	34
El Dorado	22		
Emporia	140		
Ft. Scott	53		
Humboldt	21		

2018 Westar: Tree-Caused Outages by Service Center		2018 Westar: Tree-Caused Outages by Service Center	
Service Center	**Outages**	**Service Center**	**Outages**
Hutchinson	180		
Independence	60		
Junction City	26		
Lawrence	204		
Leavenworth	140		
Manhattan	111		
Marysville	27		
Newton	48		
Parsons	61		
Pittsburg	62		
Salina	83		
Shawnee	105		
Topeka	647		
Wichita	343		
Grand Total	**2502**	**Grand Total**	**772**

Chart 1 and Chart 2 provide tree caused outage totals by company and by facility type impacted in the Westar and KCP&L service territories.





C(2). <u>Post Storm Review of Significant Outages Caused of Each Major Event Day</u>

Below are specific details related to each major storm date recorded by either the KCP&L or Westar service areas. In addition to those specific issues, some general lessons learned for the two organizations during our partial first year of operations are:

1. The use of Communicating Fault Indicators (CFI). Westar installed a number of CFI as part of the EDGR project. These devices can identify a specific section of the circuit that has a problem. Most of these devices interface with an internal software tool called Vision. When combined, these tools can identify the location of the fault within a few pole spans, greatly reducing the troubleshooting time for our restoration efforts. The KCP&L team is looking to deploy similar technology in 2019.

2. The deployment of Automatic Meter Infrastructure (AMI) continues to provide value. These devices help us predict what upstream device may have cleared because of an issue on the system, which also helps with reducing restoration times. The AMI is also very helpful in reducing truck rolls towards the end of an outage. Operators can ping these meters to validate their status instead of rolling a truck to the location, eliminating unnecessary truck rolls.

3. Tree trimming continues to be credited with reducing outage numbers and restoration times. It is difficult to point to any specific metric in the reliability numbers to support this observation. Instead, this observation relies on the years of experience of our field personnel.

4. The November 25th storm was our first major storm with significant icing since our 2007 ice storm. The newly updated transmission and distribution systems held up very well compared to the prior ice storm. The company plans to continue targeting older infrastructure and will repair or replace it where prudent.

5. The deployment of personnel and contractors from the non-impacted areas of the company is much quicker than it was historically. This efficient deployment of resources results in reduced restoration times.

6. Both organizations help reduce the safety risk to the public by maintaining lists of critical customers, such as hospitals, schools, nursing homes, business, and critical care customers who are given special consideration during restoration efforts.

7. The distribution system operators (DSO) maintain the system operating authority during storm conditions. Crews coordinate their desired switching with the DSO who can verify there are no other crews working on the line about to be energized. This centralized control keeps our crews and contractors safe.

Major Event Day Summary

A summary for the various Major Event Days from June 2, 2018 to the end of the year. All CAIDI information listed below are non-adjusted:

On June 2nd, a strong thunderstorm impacted the service territories for both companies. This storm occurred prior to the close of the merger and both companies followed their normal storm restoration procedures. There was nothing unusual or notable about this storm.

	Customers	CMI	CAIDI
KCP&L	103,816	50,161,107	483
Westar	34,901	5,241,012	150

On June 12th, a strong thunderstorm impacted the eastern part of our Kansas service territory and most of the Missouri territory, resulting in a major storm for the KCP&L territory. This was our first storm as a combined company. This was also the first time that line personnel worked across company lines. This provided some learning opportunities about the benefits of being able to deploy personnel across the territory during storm conditions and how this helps with improved restoration times.

	Customers	CMI	CAIDI
KCP&L	21,069	5,712,205	271

On June 26th, a strong thunderstorm impacted the service territories for both companies. Most of the territory experienced damage that is normally associated with a thunderstorm. With these storms, as they progressed across our territory, we were able to better assess the potential damage to other "yet to be impacted areas" and start securing personnel early based on real-time damage assessments.

This storm also produced an EF-3 tornado in the Eureka area causing extensive damage. We mobilized Westar crews and contractors to the Eureka location, set up a remote command post, and deployed the Westar In Motion community trailer to help with customer comforts such as charging stations and water. Lessons learned during this storm included the need to name early on a liaison that could coordinate communications between Westar and the various local, state, and federal agencies present who are also busy coordinating restoration efforts. We also benefited from using Engineers, Managers, and other employees who do not commonly perform damage assessments to help with these tasks. Having access to key, local people, is helpful to secure knowledge for logistic issues such as generators, ice, crew comfort, and other various miscellaneous items. We also secured a food truck for this remote location that helped with minimizing crew travel time for meals. Communications equipment such as cell phones, can be an issue with damage related to the tornado. We will need to work with cell phone providers to help with this issue in the future.

	Customers	**CMI**	**CAIDI**
KCP&L	22,756	4,601,825	202
Westar	13,062	5,671,202	434

On July 19th, a microburst went through the Westar central region, causing significant damage to the Topeka and Lawrence areas. We deployed a number of employees who do not commonly perform damage assessments to help with this work, which helped management coordinate restoration efforts, resulting in a more efficient use of line personnel.

	Customers	**CMI**	**CAIDI**
Westar	35,512	7,076,616	199

On August 28th, a strong thunderstorm grew over the top of the KC metro area and moved eastward. There was nothing notable regarding lessons learned about this storm.

	Customers	**CMI**	**CAIDI**
KCP&L	29,479	7,679,727	260

On November 25th, a wintery mix of snow and ice hit the combined service territories, with the KC metro and eastern part of the Westar territory experiencing

the most damage. This storm shut down major roadways, including Interstate 70 in Kansas, delaying the movement of resources from less impacted areas to locations with heavier damage. Restoration efforts went very well; especially when factoring in the bad road conditions.

	Customers	CMI	CAIDI
KCP&L	43,505	9,689,475	222
Westar	25,872	6,690,209	259

C(3). <u>Transmission System Patrols Summary</u>

All Westar Energy and KCP&L-KS transmission lines are patrolled annually by aerial and/or ground patrol. Westar Energy has 49,382 structures and KCP&L-KS has 4,141 structures. There were 76 combined corrective actions, based on aerial and ground patrols, completed in 2018. There are 46 combined corrective actions scheduled for 2019 completion.

Detailed and intrusive inspections were completed on transmission lines in both Westar Energy and KCP&L-KS service areas in 2018. Westar Energy had 3011 poles and KCP&L-KS had 719 poles for a total of 3730 poles that were inspected in the combined service areas of which, 3 were found in need of corrective action. There were 12 combined corrective actions, based on detailed and intrusive inspections, completed in 2018. There are 7 poles scheduled for completion in 2019.

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

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

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

Westar Energy Transmission				Completed Through December 2018			
System Class	**Inspection Type**	**Facility Type**	**Units**	**Inspections Planned for 2018**	**Inspections Completed During 2018**	**Inspections Completed Prior to 2018 (Ahead of Plan)**	**Inspections Pending in 2018 Outside of Plan**
Transmission	Aerial and Ground Patrol	Overhead Circuits Structures & Equipment	Structures	49,382	49,382	0	0
		Underground Structures and Equipment	Structures	0	0	0	0
	Detail and Intrusive	Wood/Steel Poles	Poles	3011	3011	0	0

KCP&L-KS Transmission				Completed Through December 2018			
System Class	**Inspection Type**	**Facility Type**	**Units**	**Inspections Planned for 2018**	**Inspections Completed During 2018**	**Inspections Completed Prior to 2018 (Ahead of Plan)**	**Inspections Pending in 2018 Outside of Plan**
Transmission	Aerial and Ground Patrol	Overhead Circuits Structures & Equipment	Structures	4,141	4,141	0	0
		Underground Structures and Equipment	Structures	n/a	n/a	n/a	n/a
	Detail and Intrusive	Wood/Steel Poles	Poles	719	719	0	0

Westar Energy Transmission Corrective Action (CA) Summary							
System Class	**Inspection Type**	**Facility Type**	**Component**	**CA Planned in 2018**	**CA Completed in 2018**	**CA Planned in 2019**	**CA Planned after 2019**
Transmission	Aerial and Ground Patrol	Overhead Structures & Equipment	Poles, Switches	27	46	40	40
	Aerial and Ground Patrol	Underground Structures and Equipment	Manhole	0	0	0	0
	Detail and Intrusive	Poles and Structures - Wood/Steel	Poles	3	11	6	10

KCP&L-KS Transmission Corrective Action (CA) Summary							
System Class	**Inspection Type**	**Facility Type**	**Component**	**CA Planned in 2018**	**CA Completed in 2018**	**CA Planned in 2019**	**CA Planned after 2019**
Transmission	Aerial and Ground Patrol	Overhead Structures & Equipment	Poles, Switches	21	30	6	6
	Aerial and Ground Patrol	Underground Structures and Equipment	Manhole	n/a	n/a	n/a	n/a
	Detail and Intrusive	Poles and Structures - Wood/Steel	Poles	1	1	1	1