

**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) Docket No. 19-KCPE-178-CPL
Company and Evergy, Inc. Regarding Service)
Quality and Reliability Performance Standards)
Pursuant to the Commissions Order in)
Docket No. 18-KCPE-095-MER.)

COMPLIANCE FILING

COME NOW Evergy Metro, Inc. d/b/a Evergy Kansas Metro [f/k/a Kansas City Power & Light Company] (“Evergy Kansas Metro”), Evergy Kansas Central, Inc. [f/k/a Westar Energy, Inc.] and Evergy Kansas South, Inc. [f/k/a Kansas Gas and Electric Company] (collectively referred to herein as “Evergy Kansas Central”);” and all three collectively referred to herein as “Companies”¹, and submit this compliance filing (“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

¹ Effective October 8, 2019, Evergy Metro, Inc. d/b/a Evergy Kansas Metro adopted the service territory and tariffs of KCP&L; *Order Approving Name Change*, Docket No. 20-KCPE-122-CCN, dated October 8, 2019. Effective October 8, 2019, Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. d/b/a collectively as Evergy Kansas Central adopted the service territory and tariffs of Westar; *Order Approving Name Change*, Docket No. 20-WSEE-123-CCN, dated October 8, 2019.

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. The Companies filed prior compliance filings for 2019 on April 24, 2019 (Q1); August 1, 2019 (Q2); and October 31, 2019 (Q3), pursuant to Merger Condition 36 (“Compliance Filings”), that included Customer Service Reliability (“CSR”) data. When calculating the CSR data reported pursuant to Merger Condition 36, the Companies are permitted to exclude the data from certain days that qualify for exclusion under the Institute of Electrical and Electronics Engineers (“IEEE”) standards. However, when calculating the CSR data provided in the aforementioned Compliance Filings, the Companies mistakenly used only the permitted IEEE Kansas exclusions and failed to include the permitted Missouri exclusions. It is appropriate for both Kansas and Missouri exclusions to be included in the calculations because the Missouri exclusions affect the CSR data for the Raytown, Missouri call center. As such, the Companies have updated their CSR data calculations for all of 2019 and the data for the first three quarters of 2019 previously reported in prior Compliance Filings is being updated to include the appropriate IEEE exclusions. This updated CSR data is included in Attachment C. Additionally, the CSR data being reported for the fourth quarter of 2019 was also calculated using the appropriate exclusions and is reflected in Attachment C.

3. In accordance with Merger Condition 36 and, subject to paragraph 2 above, the Companies hereby submit to the Commission the following attachments:

- Attachment A: Quality of Service – Reliability Statistics**
- Attachment B: Quality of Service -Customer Contact -Customer Contact Center Statistics (unadjusted)**
- Attachment C: Quality of Service – Customer Contact Center Statistics (adjusted for exclusions due to weather)**

Respectfully submitted,

/s/ Robert J. Hack

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**COUNSEL FOR EVERGY KANSAS METRO and EVERGY KANSAS CENTRAL
F/K/A KANSAS CITY POWER & LIGHT COMPANY, WESTAR ENERGY,
INC., AND KANSAS GAS & ELECTRIC COMPANY**

VERIFICATION

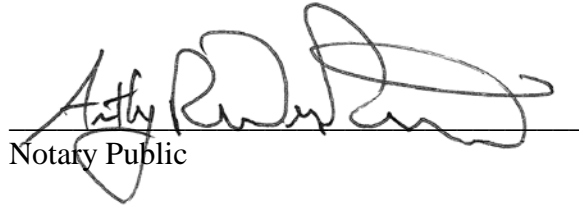
STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

The undersigned, Darrin R. Ives, upon oath first duly sworn, states that he is the Vice President of Regulatory Affairs of Evergy, Inc., 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.

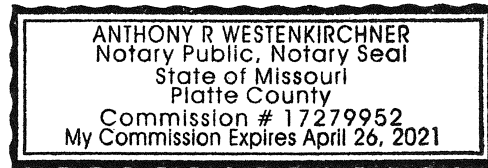


Darrin R. Ives
Vice President, Regulatory Affairs

Subscribed and sworn to before me this 31st day of January 2020.


Notary Public

My appointment expires: 4/26/2021



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 31st day of January 2020 to:

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/s/ Robert J. Hack

Robert J. Hack

2019 Quality of Service Reliability Statistics**Evergy Kansas Metro**

Reliability Data

2019

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Year to Date
IEEE 1366 Normalized SAIDI	5.25	1.98	5.45	5.71	10.80	5.47	4.34	11.31	5.16	3.00	2.45	2.08	63.00
IEEE 1366 Normalized SAIFI	0.050	0.025	0.075	0.064	0.081	0.054	0.054	0.098	0.061	0.052	0.033	0.029	0.676
IEEE 1366 Normalized CAIDI	106.05	79.47	72.45	89.24	132.78	101.09	80.89	115.48	84.58	57.38	73.19	71.69	93.52

Evergy Kansas Central

Reliability Data

2019

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Year to Date
IEEE 1366 Normalized SAIDI	6.60	4.78	7.20	7.45	17.52	8.43	10.86	19.06	6.03	9.20	7.90	5.67	110.70
IEEE 1366 Normalized SAIFI	0.057	0.052	0.072	0.082	0.139	0.098	0.103	0.148	0.065	0.090	0.084	0.074	1.064
IEEE 1366 Normalized CAIDI	115.64	91.14	100.03	91.06	125.96	86.33	105.43	128.61	92.59	102.34	94.08	76.91	104.03

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**Evergy Kansas Metro**

	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

Evergy Kansas Central

	2012	2013	2014	2015	2016	Average
IEEE 1366 Normalized SAIDI	111.3	118.4	118.3	124.2	133.7	121.2
IEEE 1366 Normalized SAIFI	1.24	1.27	1.34	1.37	1.28	1.30
IEEE 1366 Normalized CAIDI	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.

Evergy Reliability Statistics*
Evergy Kansas Metro Monthly Regulatory Reporting [2019]

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Year to Date
Abandoned Call Rate	10.6%	4.0%	5.1%	5.7%	5.8%	3.0%	4.4%	3.8%	4.1%	3.9%	2.7%	2.1%	4.8%
Service Level-Total Agent	61%	70%	64%	60%	66%	77%	73%	66%	69%	74%	80%	88%	70%

Westar Reliability Statistics

Evergy Kansas Central Monthly Regulatory Reporting [2019]

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Year to Date
Abandoned Call Rate	2.8%	2.0%	1.9%	1.6%	3.2%	2.6%	2.0%	3.1%	2.2%	2.6%	2.8%	1.6%	2.4%
Service Level-Total Agent	83%	82%	81%	86%	77%	85%	86%	77%	77%	75%	82%	92%	82%

Abandoned Call Rate	Total Center Agent Abandoned (ACR)
Service Level-Cust Service	Total Center Agent Service Level (ASL)

***Methodology for Year-to-Date Numbers**

Retrieved for the reported periods from CMS, not an average

Retrieved for the reported periods from CMS, not an average

Evergy Reliability Statistics*
Evergy Kansas Metro Monthly Regulatory Reporting [2019]

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Year to Date
Abandoned Call Rate	4.9%	4.0%	5.1%	5.7%	5.5%	2.7%	3.8%	3.5%	3.9%	3.9%	2.7%	2.1%	4.0%
Service Level-Total Agent	69%	70%	64%	60%	66%	80%	75%	68%	70%	74%	80%	88%	72%

Excluded dates KCP&L

1st Quarter Exclusions

2nd Quarter Exclusions - Revised

3 Quarter Exclusions

4 Quarter Exclusions

January 12th-15th - Winter Storm Exclusion

Informed on 10/11 Legacy KCPL had a storm exclusion on 6/21/2019. Informed on 12/26/19 of additional IEEE exclusions - May 20th, May 24th and June 22nd

July 21st. Informed on 12/26/19 of additional IEEE exclusions - June 22, July 10th, August 16, August 17th and September 27th

No exclusions

Evergy Kansas Central Monthly Regulatory Reporting [2019]

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Year to Date
Abandoned Call Rate	2.7%	2.0%	1.9%	1.6%	2.7%	2.3%	1.8%	2.4%	2.2%	2.6%	2.8%	1.6%	2.2%
Service Level-Total Agent	83%	82%	81%	86%	78%	87%	87%	79%	77%	75%	82%	92%	82%

Excluded dates Westar

1st Quarter Exclusions

2nd Quarter Exclusions

3rd Quarter Exclusions

4th Quarter Exclusions

January 19th - Winter Storm Exclusion

May 20th, May 27th, June 21st, 23rd Storm Exclusion dates. Informed on 12/26/19 of additional IEEE exclusions - May 28th, June 15th & June 22nd

July 10th, August 17th and August 30th storm exclusions dates

No exclusions

*Methodology for Year-to-Date Numbers