

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

AUG 16 2013

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

by
State Corporation Commission
of Kansas

**REQUEST OF KANSAS CITY POWER & LIGHT COMPANY TO DISCONTINUE
REPORTING REQUIREMENT**

COMES NOW Kansas City Power & Light Company ("KCP&L" or "Company") and requests the State Corporation Commission of the State of Kansas ("Commission") to issue an order approving discontinuance of KCP&L's Quality of Service ("QoS") reporting requirements under Docket No. 07-KCPE-1064-ACQ ("1064 Docket") for the reasons submitted herein.

I. BACKGROUND

1. On April 4, 2007, KCP&L et al filed for Commission approval to acquire the Missouri electric utility assets of Aquila, Inc. ("Aquila").¹ On the same date, Black Hills Corporation et al filed for Commission approval to acquire the Kansas natural gas assets of Aquila.² The dockets were consolidated for purposes of considering the proposed related acquisitions.

2. Settlement agreements were reached with Commission Staff ("Staff"), the Citizens' Utility Ratepayer Board ("CURB") and other parties to each docket which, in part,

¹ See *Joint Application*, 1064 Docket, 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, filed Apr. 4, 2007.

² See *Joint Application*, Docket No. 07-BHCG-1063-ACQ ("1063 Docket"), In the Matter of the Joint Application of Aquila, Inc., d/b/a/ Aquila Networks – KGO, Black Hills Corporation and Black Hills/Kansas Gas Utility Company, LLC ("BH Kansas Gas"), Joint Applicants, for an Order Approving the Transfer to BH Kansas Gas of Aquila's Certificates of Convenience and Necessity and Franchises with Respect to all of Aquila's Kansas Natural Gas Business, Including its Transmission and Distribution Facilities Located in the State of Kansas, and for Other Related Relief, filed Apr. 4, 2007.

recommended approval of the acquisitions (“1064 Settlement Agreement” and “1063 Settlement Agreement,” collectively “Settlement Agreements”).³ The Commission approved the Settlement Agreements on May 15, 2008.⁴ As part of the Settlement Agreements, KCP&L and Black Hills each agreed to comply with performance standards for their Kansas operations for an unspecified period of time after the completion of the acquisitions. Black Hills’ standards addressed performance of its call center, meter reading, service and work orders and natural gas standards while KCP&L’s standards addressed performance of its Customer Call Center, Meter Reading, Service Orders / Work Orders and Reliability. Both companies were required to report quarterly to the Commission on their actual performance in these areas of service.⁵ Adoption of the QoS standards for KCP&L provided assurance to the Staff, the Commission and Kansas customers that the level of service provided its Kansas customers prior to the Aquila acquisition would continue after the acquisition.⁶ Similarly, in the case of Black Hills, adoption of the standards allowed the Commission to ensure that the newly acquired customers of Black Hills would receive adequate service after the acquisition.

3. Both Settlement Agreements included penalty provisions in the event that KCP&L or Black Hills missed certain stated threshold performance levels measured on a calendar year basis.⁷ In each case, the Settlement Agreement provided for elimination of the

³ See *Joint Motion and Settlement Agreement*, 1064 Docket, filed Feb. 27, 2008, and *Joint Motion and Settlement Agreement*, 1063 Docket, filed Jan. 31, 2008.

⁴ See *Order Granting Joint Motions to Adopt Stipulation and Agreement and Approving Agreements*, issued May 15, 2008 in both the 1063 and 1064 Dockets.

⁵ See *1064 Settlement Agreement*, 1064 Docket, Attachment 2, Reporting Provisions, p.1. See *1063 Settlement Agreement*, 1063 Docket, Article IV, ¶ 2(g) and Attachments 1-5.

⁶ See Direct Testimony of Mark F. Doljac, 1064 Docket, p. 3, lns. 1-8, p. 7, lns. 13-23, filed Jan. 3, 2008.

⁷ See *1064 Settlement Agreement*, 1064 Docket, Article III, ¶ 1, Attachment 1, and Attachment 2, p. 3, and *1063 Settlement Agreement*, 1063 Docket, Article IV, ¶ 2(g), Attachments 1 and 2, and Attachment 3, p. 3.

penalty provisions in the event the Company met or exceeded its performance standards for the various metrics for three consecutive years.⁸

4. Staff completed its Report & Recommendation regarding KCP&L's compliance for years 2009 through 2011 on March 27, 2013 ("Staff's R&R") and it was submitted to the Commission on April 4, 2013.⁹ In accordance with the 1064 Settlement Agreement, KCP&L met all performance standards for each of the service metrics since the acquisition, and Staff's R&R concluded that the penalty provisions should be terminated.¹⁰ Staff also recommended that KCP&L should continue reporting on all performance metrics.¹¹ On April 10, 2013, the Commission issued its *Order Adopting Staff Report and Recommendation* ("April 10th Order") which accepted Staff's recommendations.¹²

5. Pursuant to the Commission's *Order Ending Consolidation of Dockets (07-BHCG-1063-ACQ and 07-KCPE-1064-ACQ), Providing for Compliance Filings, and Closing Dockets*, issued September 17, 2008, the obligation for both companies to file quarterly reports was to continue until the Commission ordered otherwise.¹³ On June 13, 2013, the Commission relieved Black Hills of its obligation to continue filing quarterly reports under the

⁸ See *1064 Settlement Agreement*, 1064 Docket, Attachment 2, p. 5, and *1063 Settlement Agreement*, 1063 Docket, Attachment 3, p. 3.

⁹ A copy of Staff's R&R was not filed separately in the compliance docket, Docket No. 12-KCPE-791-CPL ("791 Docket"), in the Matter of Kansas City Power & Light Company's Compliance Filings as Required by Commission Order Dated September 17, 2008 in Docket No. 07-KCPE-1064-ACQ, but was later attached to the Commission's April 10th Order in that docket.

¹⁰ See Staff's R&R attached to the April 10th Order, 791 Docket, pp. 3-4, end of first paragraph under ANALYSIS. Also see, Staff's R&R, p. 5.

¹¹ *Id.*, p. 6.

¹² See *Order Adopting Staff Report and Recommendation*, 791 Docket, issued Apr. 10, 2013.

¹³ See *Order Ending Consolidation of Dockets (07-BHCG-1063-ACQ and 07-KCPE-1064-ACQ), Providing for Compliance Filings, and Closing Dockets*, 1064 Docket, Ordering ¶¶ D and E, pp. 7-8, issued Sep. 17, 2008.

1063 Settlement Agreement.¹⁴ KCP&L is hereby requesting to be similarly relieved of the reporting requirement obligations under the 1064 Settlement Agreement.

II. REASONS WHY THE COMMISSION SHOULD ELIMINATE THE QUALITY OF SERVICE REPORTING REQUIREMENTS FOR KCP&L

A. KCP&L has demonstrated its commitment to service reliability and customer service.

6. KCP&L has been submitting quarterly QoS reports since reporting out fourth quarter 2008 actual performance in early 2009. It has always met or surpassed the annual performance thresholds for all service metrics under the provisions of the 1064 Settlement Agreement. KCP&L has never been assessed penalties under the Agreement. In fact, KCP&L met the requirement to end the penalty provisions at the earliest possible time – within the first three consecutive calendar years under the 1064 Settlement Agreement. Attached are the results for each of the calendar years 2009-2012 (**Exhibit 1**). As demonstrated in **Exhibit 1**, the Company has performed better than the standards that were put in place to ensure continued service levels to its Kansas customers.

7. Prior to the Aquila acquisition KCP&L had an established record of providing high quality service to its customers. The reporting requirements were put in place to ensure that high level of performance continued in the wake of the acquisition. Since the time KCP&L acquired the Aquila assets in July 2008, the Company has effectively demonstrated its commitment to reliability and customer service. As a result, reporting is no longer necessary.

8. Customer service is essential to KCP&L. It strives to be a 1st Tier company. There are a number of ways the Company currently measures customer satisfaction including the speed in which calls to the call center are answered, customer comment cards, post contact live

¹⁴ See Order Granting Black Hills' Motion for Permission to Discontinue Filing Quarterly Quality of Service Reports, Docket No. 12-BHCG-793-CPL ("793 Docket"), In the Matter of Black Hills/Kansas Gas Utility Company, LLC, d/b/a Black Hills Energy's Compliance Filings as Required by Commission Order Dated May 15, 2008 in Docket No. 07-BHCG-1063-ACQ, issued Jun. 13, 2013.

surveys, and JD Power surveys. Such feedback enables the Company to continually improve its service. In addition to recognition for reliability noted below in paragraph 14, KCP&L has received recognition for its high level of customer service. In its 2010 Electric Utility Business Customer Satisfaction Study™, J.D. Power and Associates' recognized KCP&L as the highest ranked large electric utility in the Midwest segment for business satisfaction. In 2007, KCP&L was voted the winner of the EEI Outstanding Customer Service Award for medium-sized utilities and was recognized by J.D. Power and Associates for its Tier 1 performance for Midwest utilities. KCP&L ranked No. 1 on Communications; No. 2 on Power Quality and Reliability, and Billing and Payment; and No. 3 in Overall Satisfaction. KCP&L continually strives to satisfy its customers.

B. No other electric or gas utility in Kansas has quality of service reporting requirements with the Commission.

9. KCP&L has demonstrated over the last nearly five years that its Kansas customers have continued to receive the high standard of service to which they were accustomed prior to the acquisition. KCP&L is the only electric or gas utility in Kansas we are aware of that has QoS reporting requirements with the Commission. It must be remembered that these reporting requirements were put in place to prevent a problem from occurring, not to address an actual QoS issue being experienced by KCP&L's customers. When ONEOK acquired Kansas Gas Service ("KGS") in 1997, performance standards were adopted as a condition of approving the acquisition. KGS subsequently sought to eliminate the reporting and was allowed to do so. As stated above, Black Hills recently sought and was granted discontinuance of the quality of service reporting requirement put in place as the result of its acquisition of Aquila's Kansas gas utility assets at the same time KCP&L acquired Aquila's Missouri electric utility assets. Staff's R&R confirmed KCP&L has continued its high level of quality of service. The reporting

requirement was an effective mechanism to allow Staff and the Commission to gain a comfort level with KCP&L's commitment following the acquisition; however, KCP&L has fulfilled the intent of the QoS reporting and requests the end to the reporting requirement. There is no rational basis to require KCP&L to continue to file QoS reports when no other electric or gas utility in Kansas is required to make such filings.

C. The customer service center, meter reading and service / work order reporting requirements are no longer necessary.

10. KCP&L has met or surpassed all of the customer service and meter reading annual performance thresholds.¹⁵ KCP&L has demonstrated its commitment to customer service. In its April 10, 2013 Report & Recommendation attached to the Commission's Order ("Staff's R&R"), Staff states,

Staff has completed its review of the 2011 QOS Report submitted by KCP&L and the Company has met or exceeded the reporting parameter metrics for Call Blockage Rate, Agent Abandoned Call Rate, Service Level, Average Speed of Answer, and Estimated Bills Per 1000 Customers. As such, KCP&L has performed at a level that was agreed to be acceptable under the 07-1064 Settlement Agreement. KCP&L has performed at this level for a three year period; therefore, the burden of a penalty also agreed to in the 07-1064 Settlement Agreement is no longer applicable.

Staff's R&R failed to note that KCP&L also met or exceeded the performance metrics for the Customer Call Center and Meter Reading for calendar year 2012. Therefore, KCP&L has been in compliance with – has met or surpassed – the performance metrics for the Customer Call Center for all four calendar years since the QoS metrics were implemented. **Exhibit 1** provides the results for each of the calendar years 2009 through 2012. KCP&L is not aware of any other Kansas utility being required to report such service metrics. The reporting has served its intended purpose and the reporting requirement should now be terminated.

¹⁵ Customer Call Center metrics include Call Blockage Rate (CBR), Agent Abandoned Call Rate (ACR), Service Level (SL), and Average Speed of Answer (ASA). Meter Reading metrics include Estimated Bill Rate per 1,000 customers (EBR).

11. The history for the Meter Reading metrics mirrors that for the Customer Call Center metrics. KCP&L has met or exceeded the annual Meter Reading metrics for each year since reporting began. **Exhibit 1** provides the results for each of the calendar years 2009 through 2012. As with the Customer Call Center reporting, the Meter Reading reporting requirement has served its intended purpose and should now be terminated.

12. Additionally, KCP&L has reported out information on Service Order / Work Order completion as part of its QoS reporting. Service Order / Work Order performance was never subject to penalty provisions under the Settlement Agreement and a performance threshold was not set for this metric; however, KCP&L performed at high levels throughout the reporting period. KCP&L has never been questioned by Staff or any other party regarding Service Order / Work Order completion and no concerns regarding this metric have ever been raised. The reporting requirements for Service Order / Work Order completion should also be terminated.

D. The reliability reporting requirements of the QoS Reports are duplicative and no longer necessary.

13. Under the Service Reliability section of the QoS Reports, KCP&L is required to report quarterly and rolling 12-month reliability statistics including SAIDI, SAIFI and CAIDI.¹⁶ KCP&L is required to report similar statistics under two other Kansas dockets. Docket No. 97-GIME-483-GIE (“483 Docket”) requires annual reporting of vegetation management statistics including reliability statistics SAIDI, SAIFI and CAIDI on a total Company and Kansas jurisdictional basis. Docket No. 02-GIME-365-GIE (“365 Docket”) requires annual reliability statistic reporting, again including SAIDI, SAIFI and CAIDI, on a KCP&L Kansas jurisdictional basis. The 365 Docket also requires reporting within four weeks for storms or other events that significantly impact an electric utility’s service and meet the reporting criteria. Requiring a

¹⁶ SAIDI stands for System Average Interruption Duration Index. SAIFI stands for System Average Interruption Frequency Index. CAIDI stands for Customer Average Interruption Duration Index.

utility to report reliability statistics in three separate dockets is duplicative and unnecessary. The 483 Docket and the 365 Docket apply to all Kansas electric utilities subject to the Commission's jurisdiction. The QoS requirements apply only to KCP&L. The additional reporting has served its purpose in showing that KCP&L's service to its Kansas customers has not deteriorated as a result of the Aquila acquisition and should now be terminated. The Commission will continue to be able to monitor KCP&L's reliability performance through the 483 Docket and 365 Docket reporting.

E. KCP&L has been nationally recognized repeatedly for its high level of reliability and customer service during the reporting period.

14. During the period of reporting to date under the Settlement Agreement, KCP&L has repeatedly been recognized for its high level of reliability by national organizations comparing utilities across the country. For example, KCP&L received the 2011 ReliabilityOne™ Plains Region Reliability Excellence Award presented by PA Consulting Group in recognition for being the most reliable electric utility in the region. (See **Exhibit 2**.) This was the fifth year in a row KCP&L was honored with the award. As for customer service, KCP&L was recognized by J.D. Power and Associates in its 2010 Electric Utility Business Customer Satisfaction Study™ as the highest ranked large electric utility in the Midwest segment for business satisfaction.

15. Such repeated recognition for reliability further supports that KCP&L takes reliability seriously and continued its attention to reliability for all of its customers before and after its Aquila acquisition.

III. CONCLUSION

16. In conclusion, KCP&L has demonstrated its continuing commitment to customer service and reliability, that the reporting required under the 1064 Settlement Agreement is no

longer necessary and, in some cases, such reporting is duplicative. KCP&L therefore respectfully requests termination of the QoS reporting requirements under the 1064 Docket. The Commission's Order granting Black Hills' request for termination of reporting requirements under the 1063 Settlement Agreement states,

The Commission agrees with Black Hills' assertion that the requirement to file quarterly QOS reports should be terminated. As stated in Staffs R&R, Black Hills demonstrated in its 2011 and 2012 QOS reports that it has: "[M]et or exceeded the reporting parameter metrics for Call Blockage Rate, Agent Abandoned Call Rate, Service Level, Average Speed of Answer, Estimated Bills Per 1000 Customers, and Service Orders Completed on Time. As such, Black Hills has performed above the level that was agreed to be acceptable under the 07-1063 Settlement Agreement.

As Black Hills asserts, the Commission finds the company has met or exceeded performance metrics since it began submitting quarterly QOS reports in 2008, and has never been assessed penalties. Further, the Commission finds the reason stated in Staffs R&R as to the point of QOS regulation, "to prevent utilities from failing to fulfill their charge to serve customers in a safe and efficient manner," has been met in this case, and there is no persuasive argument as to why Black Hills needs to continue to be monitored on a quarterly basis to assure it provides safe and efficient customer service.

The Commission finds no reason has been shown as to why the quarterly QOS reporting should continue, and Black Hills' arguments as to why the reporting requirement should end are persuasive. Therefore, the Commission concludes the requirement for Black Hills to file quarterly QOS reports should be eliminated.¹⁷

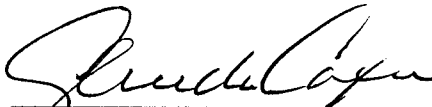
The same logic used by the Commission in its decision regarding discontinuance of the QoS reporting requirements for Black Hills applies equally to KCP&L.

WHEREFORE, for the reasons set forth herein, KCP&L asks the Commission to grant its request and issue an order terminating the QoS reporting requirements under the 1064 Settlement Agreement.

¹⁷ *Order Granting Black Hills' Motion for Permission to Discontinue Filing Quarterly Quality of Service Reports*, 793 Docket, ¶¶ 6 and 7, pp. 3 and 4, issued Jun. 13, 2013.

Respectfully submitted,

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**COUNSEL FOR KANSAS CITY POWER &
LIGHT COMPANY**

KANSAS CITY POWER & LIGHT COMPANY**Performance Metrics for 2009 – 2012**

Table 1: KCP&L's Call Center Metrics (Total Company)				
	Blocked Call Rate (CBR)	Service Level (SL)	Average Speed of Answer (ASA)	Abandoned Call Rate (ACR)
2009	0.61%	72%	43 Sec.	4.07%
2010	0.68%	71%	44 Sec.	4.23%
2011	0.82%	76%	37 Sec.	3.91%
2012	0.96%	69%	46 Sec.	4.62%
1st Tier Threshold	<1.00%	>67%	<47.5 Sec.	<5.00%

Table 2: KCP&L's Kansas Reliability Metrics			
	SAIDI	SAIFI	CAIDI
2009^a	123.70	0.785	157.51
2010	99.90	0.758	131.77
2011	93.18	0.726	128.27
2012	63.56	0.587	108.25
1st Tier Threshold	<130.0	<0.920	N/A

^a KCP&L originally filed its 2009 annual metrics report on January 29, 2010. On March 2, 2013, KCP&L filed *Kansas City Power & Light Company's Amended Report of Quality Assurance Performance Metrics for the Fourth Quarter of 2009 and 2009 Annual Report* which corrected an error in application of the 365 Docket rules. The corrected values are shown in this Table 2.

KANSAS CITY POWER & LIGHT COMPANY**Performance Metrics for 2009 – 2012**

Table 3: KCP&L's Meter Reading and Service/Work Order Metrics			
	Meter Reading Estimated Bill Rate (EBR)	Service Orders % w/in 5 Days	Work Orders % Complete w/in Specified Time
2009	20.0	92%	89%
2010	91.7	98%	89%
2011	47.8	98%	92%
2012	49.5	100%	96%
1st Tier Threshold	<100	N/A	N/A

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PA Consulting Group Recognizes North American Utilities for Excellence in Reliability and Customer Service at the 2012 ReliabilityOne™ and ServiceOne Awards

Award recipients honored for implementing and executing industry-leading practices, strategies and processes that breed success

New York, NY, November 28, 2012 - PA Consulting Group announced the recipients of its annual ReliabilityOne™ and ServiceOne Awards - widely recognized as one of the electric utility industry's most prestigious honors - at a reception at 7 World Trade Center in New York, before an audience that included senior management at leading utilities, industry regulators and energy industry experts. PA Consulting Group's ReliabilityOne awards recognize electric utilities for providing their customers with the highest levels of reliability in the industry, while the ServiceOne awards recognize companies for providing exceptional service to their customers as determined by a set of 25 objective measures of excellence in customer care, identified by a panel of industry experts.

"The electric utility industry as a whole met the significant weather challenges of 2011, which included hurricanes and tornadoes, and maintained reliable electric service to their customers through effective use of current and new technologies, as well as improvements in field practices that support the restoration of electric service to customers during outage events," said Jeff Lewis, Director of ReliabilityOne™ Program and head of the Global Energy Consulting practice at PA Consulting Group. As Director of the ReliabilityOne™ program, Mr. Lewis has completed more than 100 certifications of systems and processes that include emergency response plans for major events.

ReliabilityOne™ Awards

PA Consulting Group recognized five Regional ReliabilityOne™ winners from investor owned utilities across the US. The selections were based on overall system wide performance in both outage duration and frequency. PA Consulting awarded its annual National ReliabilityOne™ Excellence Award to one of its regional winners that demonstrated sustained leadership, innovation and achievement in the area of electric reliability. PA Consulting also selected from its group of regional winners one utility that had overall outstanding system wide reliability performance.

This year's National ReliabilityOne™ Excellence Award was presented to: Public Service Electric & Gas Company. Public Service Electric and Gas Company (PSE&G) is New Jersey's oldest and largest regulated gas and electric delivery utility, serving nearly three-quarters of the state's population. PSE&G is a subsidiary of Public Service Enterprise Group Incorporated (PSEG) (NYSE:PEG), a diversified energy company.

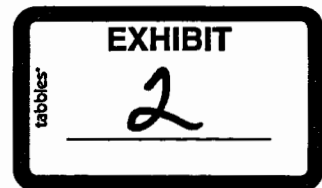
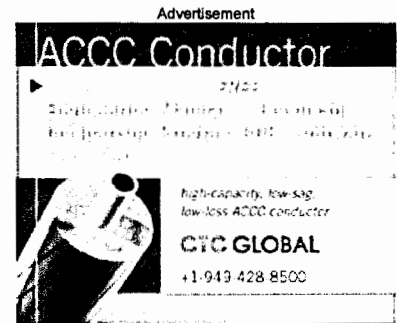
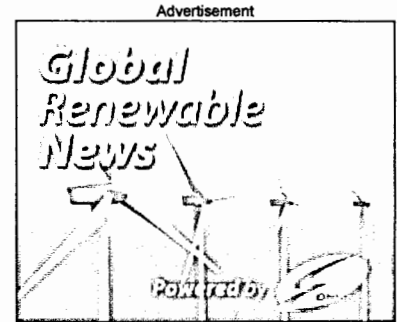
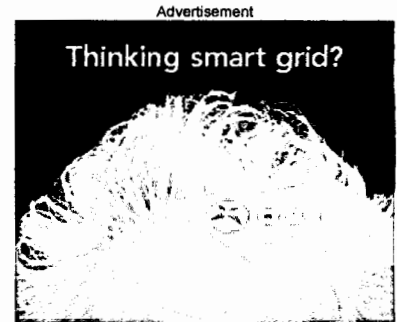
This year's five Regional ReliabilityOne™ awards recipients are:

- Northeast - Consolidated Edison Company of New York
- Mid-Atlantic - Public Service Electric & Gas Company
- Midwest - We Energies
- Plains - Kansas City Power & Light Company
- West - San Diego Gas & Electric

This year's Overall Outstanding System Wide Reliability Performance Winner: Consolidated Edison Company of New York. Con Edison is recognized for achieving the shortest average outage duration for investor owned utilities in the country. The average customer served by Con Edison experienced an overall outage duration of just over 20 minutes in 2011 - this is 85% better than the industry average.

This year also brought two winners for Outstanding Response to a Major Outage Event: San Diego Gas & Electric (SDG&E) for their response to the Pacific Southwest Blackout. The outage left 1.4 million San Diego Gas and Electric customers without power. SDG&E implemented their system restoration and black start plan and cautioned its customers of a potential prolonged outage. However, within 12 hours, power had been restored to nearly all of SDG&E's 1.4 million customers. Public Service Electric & Gas Company (PSE&G) was won for their efforts during the October snowstorm, after the October snowstorm, which was an even greater challenge to Hurricane Irene because of the unexpected nature of the event and the massive damage caused from falling trees, 570,000 electric customers were restored within seven days.

According to PA Consulting Group's 2012 ReliabilityOne™ study which covers the calendar year 2011, the average US customer experienced power outage durations of approximately two hours and 23 minutes in 2011 - nearly the same outage time as 2010, despite the extreme 2011 weather.



ReliabilityOne™ winners delivered superior reliability to their customers with an average outage duration of 56 minutes, more than 60% better than the industry average. ReliabilityOne™ winners also beat the industry top quartile performance threshold of 94 minutes by 40%.

PA Consulting Group's 2012 ReliabilityOne™ Study is based on standard industry reliability statistics that measure the frequency and duration of electric power outages. PA tracks nearly 200 public and investor owned utilities across the US and has been analyzing electric utility performance since 1987.

Polaris ServiceOne Awards

PA Consulting Group also recognized those utilities that excel in the area of customer service and care with the presentation of the ServiceOne Awards.

This year's top honor for the ServiceOne Award were shared by Florida Power & Light and San Diego Gas & Electric.

Florida Power & Light (FPL) - a nine-time award winner - is the largest electric utility in Florida and one of the largest rate-regulated utilities in the United States. FPL serves approximately 4.5 million customer accounts in Florida and is a leading employer in the state with more than 10,000 employees. FPL's high level of performance across functional areas reflects their mastery of the fundamentals of working together across the organization, leveraging data to enhance decision making, and holding individuals accountable at all levels. This along with a desire to constantly improve operations through new services or solutions for their customers is what enables them to be a top-performer year-after-year.

San Diego Gas & Electric is a regulated public utility that provides safe and reliable energy service to 3.4 million consumers through 1.4 million electric meters and more than 850,000 natural gas meters in San Diego and southern Orange counties. The utility's area spans 4,100 square miles. In 2011, SDG&E provided a high level of service in its billing and credit and collections operations. It was a leader in promoting self-service options for its customers, particularly online automatic web transactions.

ServiceOne Awards recognize companies for providing exceptional service to their customers as determined by a set of 25 objective measures of excellence in customer care, identified by a panel of industry experts. Utilities that participate in PA Consulting's Polaris ServiceOne program must achieve placement in the top quartile of the ServiceOne scorecard to be considered for the ServiceOne award. All data for provisional recipients is then validated through a certification process.

"Excellent customer service can only be achieved if it is a core value for a company. This is particularly the case in the utility sector, where increasing demands placed on customer service organizations have challenged traditional delivery strategies, business processes and modes of customer interaction," said Jerry Sullivan, PA's ServiceOne Program Director. Utilities are capitalizing on mobile channels, newer technologies, meter data, and improvements in customer experiences. "San Diego Gas & Electric and Florida Power & Light have successfully managed to create outstanding benefits for the customer through a combination of hard work, effective leadership, and an unwavering commitment to service."

Additional information on PA Consulting's ReliabilityOne™ and ServiceOne program can be found here.

About PA Consulting Group

PA Consulting Group is a firm of more than 2,000 people, specializing in management and IT consulting, technology and innovation. Independent and employee-owned, we operate globally from offices across Europe and the Nordics, the United States, the Gulf and Asia Pacific. We work with businesses and governments to anticipate, understand and meet the challenges they face. We have outstanding technology-development capability and a unique breadth of skills, from strategy to performance improvement, from HR to IT. Our expertise covers energy, financial services, life sciences and healthcare, government and public services, defense and security, transport and logistics, telecommunications, consumer goods and automotive. PA Consulting Group has partnered with energy clients for over 25 years to help them understand the challenges they face and define and implement an effective strategic response.

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VERIFICATION

STATE OF MISSOURI)
)
COUNTY OF JACKSON)

I, Mary Britt Turner, being duly sworn, on oath state that I am Director, Regulatory Affairs of Kansas City Power & Light Company, that I have read the foregoing Request and know the contents thereof, and that the facts set forth therein are true and correct to the best of my knowledge and belief.

KANSAS CITY POWER & LIGHT COMPANY

By: Mary Britt Turner
Mary Britt Turner

The foregoing Verification was subscribed and sworn to before me this 15th day of August, 2013.

Carla Lomax
Notary Public

CARLA LOMAX Notary Public - Notary Seal State of Missouri Commissioned for Clay County My Commission Expires: April 08, 2015 Commission Number: 11169285

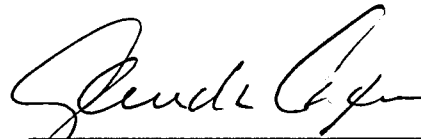
My Commission Expires:

April 8, 2015

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above Request of KCP&L to Discontinue Reporting Requirement was electronically served, hand-delivered or mailed, postage prepaid, this 16th day of August, 2013 to:

Dana Bradbury, General Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604



Glenda Cafer
Counsel for KCP&L