

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**      **APR 30 2013**

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 )  
)

by  
State Corporation Commission  
of Kansas

Docket No. 12-KCPE-791-CPL

**KANSAS CITY POWER & LIGHT COMPANY'S REPORT OF  
QUALITY ASSURANCE PERFORMANCE METRICS  
FOR THE FIRST QUARTER OF 2013**

COMES NOW Kansas City Power & Light Company ("KCP&L" or "Company") and files its *Report of Quality Assurance Performance Metrics for the First Quarter of 2013* ("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 Adopt 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.*<sup>1</sup>

Further, on April 10, 2013, the Commission issued its *Order Adopting Staff Report and Recommendation* in this 791 Docket ("April 10 Order") which ordered in part "The Commission finds that KCP&L shall continue to submit quarterly reports of its

<sup>1</sup> All quarterly report filings through fourth quarter 2011 were made under the original Docket No. 07-KCPE-1064-ACQ with a heading showing CPL-1. Beginning with the first quarter 2012 report, all quality assurance performance metrics reports have been filed under compliance Docket No. 12-KCPE-791-CPL.

Quality Assurance Performance Metrics into this compliance docket, but that penalties are no longer applicable, effective as of the date of this Order.”

Attachments 1 and 2 of the Stipulation provide for reporting on three separate areas of service quality: Continuity of Service (or Reliability) metrics, and Customer Call Center metrics and Meter Reading metrics. Consistent with the requirements of the Stipulation, attached hereto as **Exhibit 1** and **Exhibit 2**, respectively, are KCP&L’s *Service Quality Report* and KCP&L’s *Service Quality Report Summary* for the first quarter 2013 and the rolling 12-month period of April 1, 2012 through March 31, 2013.

### **KCP&L KANSAS RELIABILITY METRICS**

#### **BACKGROUND**

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 information only.

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").<sup>2</sup> (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."<sup>3</sup> For KCP&L, 10% of its Kansas customers would be approximately 24,100 customers.<sup>4</sup> 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."<sup>5</sup> 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 events within the quality of service metrics for purposes of compliance with the Stipulation.<sup>6</sup> 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

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<sup>2</sup> Docket No. 02-GIME-365-GIE Order dated October 4, 2004.

<sup>3</sup> *Id.*, Attachment A, item 3(n), page 2 of 10.

<sup>4</sup> See Section 2 Summary, column (iii), line 10, Minimum Filing Requirements, Docket No. 12-KCPE-764-RTS, filed April 20, 2012.

<sup>5</sup> Docket No. 02-GIME-365-GIE Order dated October 4, 2004, Attachment A, item 6(a), page 7 of 10.

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

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 (*sic*), 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.<sup>7</sup>

#### NORMALIZATION FOR FIRST QUARTER 2013 AND 12-MONTH AVERAGE

One storm event during first quarter 2013, occurring on February 26, 2013, met the criteria for a 365 Docket Major Event normalization. One additional storm event during the fourth quarter of 2012 was severe enough to affect greater than 10,000 Kansas customers. Both storms were reported to the Commission under the provisions of the 365 Docket.<sup>8</sup> The latter 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...lighting...storms..." (Stipulation Attachment 2, Extraordinary Events.)

Pursuant to the Stipulation, KCP&L is documenting the Major Event and claimed Extraordinary Event and their impact on KCP&L's performance as part of this Report. KCP&L has outlined these storms and referenced reports in **Exhibit 3**. 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 Event normalized data against the data reported without consideration of the Extraordinary Event.

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<sup>7</sup> *Id.*

<sup>8</sup> Docket No. 02-GIME-365-GIE, Kansas City Power & Light Company's December 20, 2012 Storm Event Report and February 26, 2013 Storm Event Report filed January 17, 2013 and March 20, 2013, respectively.

## FIRST QUARTER 2013 RESULTS

**Table 1** highlights the results for the first quarter of 2013 and the 12-month rolling average ended March 31, 2013 for KCP&L's Kansas reliability metrics both with the 365 Docket Major Event normalization exclusion only and with the normalization exclusion of the additional Extraordinary Event. KCP&L's reliability metrics were better than the metrics in all categories both with and without consideration of the Extraordinary Event. **Exhibit 3** provides the supporting documentation of the impact of the identified Events on KCP&L's reliability performance for the first quarter 2013 and the 12-month rolling average period.

<b>Table 1: KCP&amp;L's Kansas Reliability Metrics</b>						
	SAIDI <sup>a</sup>	SAIDI Excluding Extraordinary Events <sup>b</sup>	SAIFI <sup>a</sup>	SAIFI Excluding Extraordinary Events <sup>b</sup>	CAIDI <sup>a</sup>	CAIDI Excluding Extraordinary Events <sup>b</sup>
1st Qtr 2013	10.24	10.24	0.108	0.108	94.92	94.92
12-Month Rolling Performance through March 2013	73.82	64.62	0.645	0.593	114.42	109.06
1 <sup>st</sup> Tier Threshold <sup>c</sup>	<130.0	<130.0	<0.920	<0.920	N/A	N/A

<sup>a</sup> 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. One storm event during first quarter 2013 met the 365 Docket Electric Reliability Requirements item 3(n) Major Event normalization definition. No storm events during 2012 met the Major Event definition.

<sup>b</sup> SAIDI, SAIFI and CAIDI calculated excluding certain Extraordinary Events as allowed under the Stipulation.

<sup>c</sup> 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:<sup>9</sup> 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 April 1, 2012 through March 31, 2013; however, the Company has experienced a problem with a payment provider that is affecting the CBR. This vendor makes payments for customers by calling in credit card payments. The manner in which these calls are made floods the Company’s Interactive Voice Response (“IVR”) system, and the capacity to handle calls, with automated calls over a very short period during the middle of the night. Such a practice makes it impossible for the Company to respond to

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<sup>9</sup> 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.

all of the calls during this period in a timely fashion. The Company continues to work on this problem with our system provider, and recently implemented a solution, the results of which are being closely monitored. As can be seen in **Table 2** below, the first quarter 2013 and the 12-month rolling average ending March 31, 2013 CBR, ACR, SL and ASA results do not include any claims for Extraordinary Events, and all are within the thresholds set by the Stipulation.

<b>Table 2: KCP&amp;L's Call Center Metrics (Total Company)</b>								
	Blocked Call Rate (CBR) <sup>a</sup>	Blocked Call Rate Excluding Extraordinary Events <sup>b</sup>	Service Level (SL) <sup>a</sup>	Service Level Excluding Extraordinary Events <sup>b</sup>	Average Speed of Answer ASA <sup>a</sup>	ASA Excluding Extraordinary Events <sup>b</sup>	Abandoned Call Rate (ACR) <sup>a</sup>	Abandoned Call Rate Excluding Extraordinary Events <sup>b</sup>
1Q 2013	0.3%	---	76%	---	32 Sec.	---	3.1%	---
12-Month Rolling Performance through 3/30/2013	0.80%	---	70%	---	44 Sec.	---	4.49%	---
1 <sup>st</sup> Tier Threshold	<1.00%	<1.00%	>67.0% <sup>c</sup>	>67.0% <sup>c</sup>	<47.5 Sec.	<47.5 Sec.	<5.00%	<5.00%

<sup>a</sup> Call Center metrics calculated pursuant to Commission approved Stipulation in Docket No. 07-KCPE-1064-ACQ without any adjustment for storm impacts or Extraordinary Events.

<sup>b</sup> 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 2012; however, KCP&L met the metrics without need to claim any of these Events.

<sup>c</sup> 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.

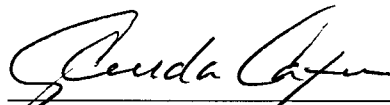
## KCP&L METER READING METRICS

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.

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 April 1, 2012 through March 31, 2013. As shown on **Exhibit 1** and **Exhibit 2**, at 48.6 estimated bills per 1,000 Kansas customers, KCP&L's Meter Reading metric for the 12-month rolling average ended March 31, 2013 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  
First Quarter 2013

Row No	Performance Data or Indicator	Formula (Bracketed Numbers) Refer Row Numbers	2013												Rolling 12-Month Performance	1st Tier Threshold	1st Qtr 2013	2nd Qtr 2012	3rd Qtr 2012	4th Qtr 2012	
			Jan-2013	Feb-2013	Mar-2013	Apr-2012	May-2012	Jun-2012	Jul-2012	Aug-2012	Sep-2012	Oct-2012	Nov-2012	Dec-2012							
<b>Customer Call Center Performance Data</b>																					
<i>Combined Operations for All Call Centers Serving Kansas Retail Customers</i>																					
0	Call Center Staffing Level		112	112	111	116	116	115	115	116	115	113	113	112	112						
1	Attempted Calls	[2]+[4]+[5]+[6]+[7]+[8]	254,344	309,606	274,804	268,255	296,918	299,409	336,203	401,445	344,519	347,271	283,188	256,914	3,672,876						
2	Blocked Calls, including courtesy response calls		651	1,449	672	2,683	3,136	1,166	1,844	2,261	5,987	3,985	4,792	699	29,325						
3	Received Calls	[1]-[2] = [4]+[5]+[6]+[7]+[8]	253,693	308,157	274,132	265,572	293,782	298,243	334,359	399,184	338,532	343,286	278,396	256,215	3,643,551						
4	Net HVCA Answered Calls (self-serve)		11,801	78,649	24,180	21,207	29,610	26,704	37,841	45,806	27,761	21,835	17,843	32,173	375,410						
5	IVR Answered Calls (self-serve)		89,108	82,707	91,375	87,624	92,470	94,064	102,357	116,407	104,400	106,554	90,299	80,325	1,137,690						
6	IVR Abandoned Calls		25,604	26,633	27,652	26,984	28,990	28,859	31,574	38,660	32,553	34,330	28,594	24,782	355,215						
7	Agent Answered Calls		124,634	116,033	125,918	125,281	137,367	142,154	156,243	184,402	161,592	169,078	135,478	117,434	1,695,614						
8	Agent Abandoned Calls		2,546	4,135	5,007	4,476	5,345	6,462	6,344	13,909	12,226	11,489	6,182	1,501	79,622						
9	Total Answered Calls	[4]+[5]+[7]	225,543	277,389	241,473	234,112	259,447	262,922	296,441	346,615	293,753	297,467	243,620	229,932	3,208,714						
10	Agent Answered Calls Answered Within 20 Seconds	[13] x ([7]+[8])	101,744	88,924	95,575	99,913	105,607	107,004	121,940	107,088	97,338	102,923	104,828	109,420	1,242,305						
11	CBR - Call Blockage Rate	([2]/[1]) x 100%	0.26%	0.47%	0.24%	1.00%	1.06%	0.39%	0.55%	0.56%	1.74%	1.15%	1.69%	0.27%	0.80%	<1.00%	0.3				
12	ACR - Agent Abandoned Call Rate	([8]/([7] + [8])) x 100%	2.0%	3.4%	3.8%	3.4%	3.7%	4.3%	3.9%	7.0%	7.0%	6.4%	4.4%	1.3%	4.49%	<5.00%	3.1				
13	SL - Service Level (% agent-answered calls answered within 20 seconds)	Recorded by CMS	80%	74%	73%	77%	74%	72%	75%	54%	56%	57%	74%	92%	70.0%	>67.0%	76				
14	ASA - Average Speed of Answer of Agent Calls (seconds)	Recorded by CMS	21	36	41	32	34	42	32	73	74	73	47	9	44.0	<47.5 Sec	32				
<b>Electric Service Performance Data</b>																					
<i>Service Reliability</i>																					
15	Kansas Customers Served		250,110	250,321	250,511	248,208	248,208	248,050	248,092	248,177	248,047	249,322	249,405	249,925	249,031						
16	Customer Interruptions, normalized		4,668	4,935	17,407	5,736	20,391	14,008	18,970	19,814	18,261	14,955	5,327	16,195	160,667						
17	Customer Interruption Minutes, normalized		340,708	391,303	1,832,020	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	18,383,550						
18	SAIDI - System Average Interruption Duration Index - Normalized (minutes per customer)	[17]/[15]	1.36	1.56	7.31	2.50	11.20	6.96	7.73	10.09	6.78	6.51	1.68	10.20	73.82	<130.0	10.24	20.67	24.59	18.39	
19	SAIFI - System Average Interruption Frequency Index - Normalized	[16]/[15]	0.019	0.020	0.069	0.023	0.082	0.056	0.076	0.080	0.074	0.060	0.021	0.065	0.645	<0.920	0.108	0.162	0.230	0.146	
20	CAIDI - Normalized (minutes per interruption)	[17]/[16] = [18]/[19]	72.99	79.29	105.25	108.33	136.33	123.27	101.04	126.37	92.04	108.48	78.72	157.36	114.42		94.92	127.77	106.95	125.81	
<i>Service Reliability Impacted by Extraordinary Events</i>																					
16.1	Customer Interruptions, normalized by Extraordinary Events		4,668	4,935	17,407	5,736	20,391	14,008	18,970	19,814	18,261	14,955	5,327	3,084	147,556						
17.1	Customer Interruption Minutes, normalized by Extraordinary Events		340,708	391,303	1,832,020	621,405	2,779,974	1,726,768	1,916,664	2,503,827	1,680,717	1,622,332	419,327	258,137	16,093,181						
18.1	SAIDI - Normalized by Extraordinary Events	[17.1]/[15]	1.36	1.56	7.31	2.50	11.20	6.96	7.73	10.09	6.78	6.51	1.68	1.03	64.62	<130.0	10.24	20.67	24.59	9.22	
19.1	SAIFI - Normalized by Extraordinary Events	[16.1]/[15]	0.019	0.020	0.069	0.023	0.082	0.056	0.076	0.080	0.074	0.060	0.021	0.012	0.593	<0.920	0.108	0.162	0.230	0.094	
20.1	CAIDI - Normalized by Extraordinary Events	[17.1]/[16.1] = [18.1]/[19.1]	72.99	79.29	105.25	108.33	136.33	123.27	101.04	126.37	92.04	108.48	78.72	83.70	109.06		94.92	127.77	106.95	98.43	
<b>Meter Reading &amp; Billing</b>																					
21	Kansas Meters to be Read		254,935	253,984	254,071	254,078	254,302	252,642	254,447	253,217	254,770	254,866	254,837	255,057	3,051,206						
22	Meters Read		254,308	253,239	253,559	252,385	253,307	251,814	252,400	252,103	253,497	254,004	253,778	254,450	3,038,844						
23	Estimated Bills	[21]-[22]	627	745	512	1,693	995	828	2,047	1,114	1,273	862	1,059	607	12,362						
24	Average Number of Customers	Month: [21]; For 12 Months: Sum([21])/12	254,267	253,406	253,458	253,537	253,623	253,608	253,721	253,737	253,851	253,951	253,118	253,170	254,267						
25	EBR - Estimated Bill Rate (estimated bills per 1,000 customers)	([23] x 1,000) / [24]	2.5	2.9	2.0	6.7	3.9	3.3	8.1	4.4	5.0	3.4	4.2	2.4	48.6	<100					
<i>Meter Reading &amp; Billing Impacted by Extraordinary Events</i>																					
22.1	Estimated Bills because of Extraordinary Events (1)																				
23.1	Estimated Bills, normalized by Extraordinary Events (Total Est. Bills less Extraordinary Event Impacted Est. Bills)	[23]-[22.1]	627	745	512	1,693	995	828	2,047	1,114	1,273	862	1,059	607	12,362						
25.1	EBR - Estimated Bill Rate - Normalized by Extraordinary Events	([23.1] x 1,000) / [24]	2.5	2.9	2.0	6.7	3.9	3.3	8.1	4.4	5.0	3.4	4.2	2.4	48.6	<100					
Notes:																					
(1) Where no material level of estimated bills because of Extraordinary Events occurred in a given month, Row 22.1 cells are left blank.																					
<b>Service Order Response</b>																					
<i>All Kansas service orders</i>																					
26	Service Orders		147	111	121	190	173	165	124	232	158	154	158	158	1,891						
27	Service Orders completed within 5 days		147	110	121	190	173	164	124	232	158	154	158	158	1,889						
28	Percentage of Service Orders Within 5 Days	[27]/[26]	100%	99%	100%	100%	100%	99%	100%	100%	100%	100%	100%	100%	100%						
<b>Work Order Response</b>																					
<i>All Kansas work requests</i>																					
29	Work Requests completed		45	35	41	58	64	55	40	52	47	57	46	51	591						
30	Work Requests completed within specified time		44	27	33	54	64	54	37	51	45	55	44	49	557						
31	Percentage of Work Requests Completed Within Specified Time	[30]/[29]	98%	77%	80%	93%	100%	98%	93%	98%	96%	96%	96%	96%	94%						

Exhibit 2

	A	B	C	D
1	<b>Kansas City Power &amp; Light Company</b>			
2	<b>Docket No. 12-KCPE-791-CPL</b>			
3	<b>Service Quality Report Summary</b>			
4	<b>First Quarter 2013</b>			
5				
6	<b>Performance Area</b>	<b>Rolling 12-Month Totals April 2012 through March 2013</b>	<b>Rolling 12- Month Totals Reflecting Impact of Extraordinary Events</b>	<b>1st Tier Threshold</b>
7				
8	<b>Customer Call Center Operations</b>			
9	CBR - Call Blockage Rate	0.80%		<1.00%
10	ACR - Agent Abandoned Call Rate	4.49%		<5.00%
11	SL - Service Level (% agent-answered calls answered within 20 seconds)	70.0%		>67.0%
12	ASA - Average Speed of Answer of Agent Calls (seconds)	44.0		<47.5 Sec.
13				
14	<b>Electric Service Operations</b>			
15	SAIDI - System Average Interruption Duration Index - Normalized (minutes per customer)	73.82	64.62	<130.0
16	SAIFI - System Average Interruption Frequency Index - Normalized (interruptions per customer)	0.645	0.593	<0.920
17	CAIDI - Customer Average Interruption Duration Index - Normalized (minutes per interruption)	114.42	109.06	None
18				
19	<b>Other</b>			
20	EBR - Estimated Bill Rate (estimated bills per 1,000 customers)	48.6		<100
21	Percentage of Service Orders Within 5 Days	100%		None
22	Percentage of Work Requests Completed Within Specified Time	94%		None
23				
24				
25				



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

RE: **Exhibit 3** - Supportive Data for Extraordinary Events Identified in KCP&L’s First Quarter 2013 Service Quality Report and First Quarter 2013 Service Quality Report Summary

KCC Docket No. 12-KCPE-791-CPL

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KCP&L’s *Report of Quality Assurance Metrics for the First Quarter of 2013* (“1Q 2013 Report”) submitted to the Commission on April 30, 2013 in compliance with the Commission’s Order in Docket No. 07-KCPE-1064-ACQ (“1064 Docket”) highlights the impact of storm events on KCP&L’s Kansas Reliability metrics, Customer Call Center metrics and the KCP&L Kansas Meter Reading metric consistent with the requirements of the Stipulation.

The December 20, 2012 storm event impacting the rolling 12-month reliability performance was reported to the Commission on January 17, 2013 and supporting documentation for this Extraordinary Event was provided to the Commission with the Company’s fourth quarter 2012 Quality of Service reports.

Although not required by the Stipulation and Agreement in the 1064 Docket (“1064 S&A”), KCP&L is providing supporting information for the one Major Event occurring in first quarter 2013 and noted in the Report in regard to its Reliability metrics – a storm occurring on February 26, 2013 which qualified as a Major Event under the 365 Docket normalization definition. The Major Event in question was reported to the Commission on March 20, 2013 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 can be found on the Commission’s website at the following address:

<http://estar.kcc.ks.gov/estar/ViewFile.aspx/20130320164449.pdf?Id=4978abf8-6d12-497b-b62f-e01941861484>

#### 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 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 interruption to approximately 24,100 Kansas customers – 10 percent of 241,000 Kansas customers – within a 24-hour period.

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.