

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of an Investigation of	)	
Aquila Inc.'s Storm Preparation and	)	Case No. EO-2008-0220
Restoration Efforts	)	

**AQUILA INC.'S RESPONSE TO  
THE STAFF INVESTIGATION OF AQUILA INC.'S STORM PREPARATION AND  
RESTORATION EFFORTS**

**COMES NOW** Aquila, Inc. dba KCP&L Greater Missouri Operations Company ("GMOC" or the "Company") and makes its response to the June 17, 2008, Final Report of Staff concerning its investigation of GMOC's Storm Preparation and Restoration.

GMOC appreciates the opportunity to review, consider and respond to Staff's June 17, 2008 report. Most importantly, it is GMOC's desire to continue to improve its storm and catastrophic event response and welcomes the opportunity to work with Staff to make those improvements. As part of that cooperative effort, we offer the following update and response to Staff's recommendations:

**General Response:** Following the acquisition of Aquila, Inc. by Great Plains Energy Incorporated, Kansas City Power & Light Company's ("KCPL") and GMOC became actively engaged in incorporating the two companies' storm response procedures and technology to assure a high level of customer service during outage events. The following responses reflect, where applicable, that effort.

**Recommendation 1:** Revise the Emergency Service Restoration Plan ("ESRP") to incorporate the "Lessons Learned."

*The GMOC ESRP is currently being evaluated for incorporation into KCPL's Storm Evaluation and Restoration Plan ("SERP") KCPL will add the recommended section into its SERP plan.*

**Recommendation 2:** Review and evaluate all other December 2007 Storm Investigation Staff reports, including all findings and recommendations. Consider for implementation all practices, procedures and recommendations determined to be applicable and beneficial to future utility operations.

*A review of Ameren, Empire and KCPL's storm reports and evaluations in the referenced matter is currently underway and will be completed by September 1, 2008. GMOC will evaluate and implement items identified as best practices. Then those best practices applicable to GMOC will be incorporated into KCPL's storm response procedures and systems.*

**Recommendation 3:** Participate in a Missouri Public Service Commission ("Commission") sponsored storm restoration workshop to discuss this report and concurrent reports for other utilities. Incorporate an agenda item for the workshop to include consistent methodology for future utility storm reporting.

*GMOC supports this recommendation and will join with KCPL in its offer to sponsor the first workshop. We believe there would be great benefit in holding annual meetings regarding storm response with Staff and the other Missouri investor-owned electric utilities.*

**Recommendation 4:** Review the maximum call allowed value ("MCA") on all toll-free numbers at the on-set of future outages and periodically throughout outages to minimize the occurrence of blocked calls. Adjust MCA values to appropriate levels to allow the maximum level of calls to the Call Center that can effectively be handled.

*GMOC's process now includes all toll-free numbers. During peak call volumes or emergency situations, all toll-free numbers are reviewed and the MCA is adjusted accordingly.*

**Recommendation 5:** Incorporate MCA reviews and adjustment steps in the Company's ESRP as an actionable item to review during outages.

*Adding MCA reviews and adjustment steps into the Company's ESRP was completed during the first quarter of 2008.*

**Recommendation 6:** Review opportunities to improve the callback system during system outages by utilizing customer secondary phone numbers. If determined operationally feasible and cost-effective to use secondary phone numbers in the callback process, verify that the Company consistently obtains secondary customer phone numbers during its contacts with customers, such as through the Call Center at the time of service application or other contact opportunities.

*Secondary customer phone numbers, if available, are captured in CIS+ but do not show in ServiceOn. GMOC's vendor, Twenty First Century, handles the callback process and can access the primary contact number from ServiceOn but not access secondary numbers stored in CIS+. Equipment/software limitations, at this time, inhibit the ability for GMOC to alter ServiceOn or Twenty First Century processes.*

*GMOC will continue to evaluate processes, procedures and technological options to cost-effectively obtain and use alternative telephone contact numbers.*

**Recommendation 7:** Review Call Center outage scripts to determine if opportunities for improvement may exist in providing customers specific instructions after

service has been restored, such as turning their porch light on, or other beneficial information they may receive in a return call from the utility.

*GMOC's online reference tool, Compass, provides business process and other useful information that the call center can access, including scripted announcements. Information stored in Compass is updated daily during emergency/outage situations or as business needs dictate.*

*As outage conditions dictate, GMOC will evaluate the nature and type of information provided to customers through the Compass system.*

**Recommendation 8:** Enable Call Center Associates to have access to the call-back system data to determine which customers have been identified as having had their service restored.

*Limitations of the ServiceOn programming does not allow call center associates access to the callback system data. GMOC is investigating how to cost effectively address the limitations of the ServiceOn programming to grant new user types, like call center associates, access to determine the service status of customers.*

**Recommendation 9:** Review and evaluate the Company's Web site for improvements including improved correspondence of city and town populations to outage data to allow that portion of the Web site to be operational and available to customers during system outages.

*Changes to GMOC's Web site were completed in May 2008 to provide additional outage information. GMOC continues to evaluate and identify ways to provide relevant and timely information to its customers through its Web site.*

**Recommendation 10:** Review the public comments filed by its customers in the Commission’s Electronic Filing and Information System (“EFIS”) continuously to determine areas of customer concern, service quality improvements and areas of success.

*GMOC will review customer comments in Commission’s EFIS following a storm and other catastrophic outage events. All comments will be reviewed and any needed follow-up will be made with the customer.*

**Recommendation 11:** Determine proactive methods to maintain current information on nursing homes and residential care facilities that may be opening and closing in its service territories.

*GMOC agrees efforts need to be made to identify critical-needs customers. GMO will continue to develop procedures to identify and capture information regarding nursing homes, residential care facilities and facilities offering similar services.*

**Recommendation 12:** Review its procedures for commitments and communication to assist local governments, including commitments to start generators for critical services such as sewage treatment. Coordinate responses and commitments effectively at the Company so that commitments are fulfilled. If commitments cannot be fulfilled, provide restoration status reports to governmental bodies on a timely basis.

*GMOC works with all communities in its territory during blue sky conditions and emergency situations. GMOC does not have generators available, but has tried to assist critical service customers by contacting the National Guard, for example, to see what help they might be able to offer.*

*During an outage event, even the best information may not adequately illustrate all that is happening in a dynamic, ever-changing situation. GMOC is committed to*

*working with communities, providing relevant and timely updates and, when possible, assistance they may require.*

**Recommendation 13:** Provide city and county officials with current secondary phone numbers and key storm-related personnel changes as a means to access appropriate utility personnel during system outages or during other critical events. Review such phone numbers and personnel changes periodically, such as every six months, with governmental officials to make sure they are current, especially after periods of personnel changes.

*Please refer to GMOC's response to Recommendation 14.*

**Recommendation 14:** Evaluate future opportunities to use on-site GMOC personnel at Emergency Operations Centers in communities where outages are most severe. Review such opportunities with county and city governmental personnel.

*GMOC agrees contact with the EOCs activated during an emergency is important. GMOC will be contacting emergency managers during August and September 2008 to gain a better understanding of each community's needs. Also, GMOC will provide contact information to the community EOC managers and stakeholders. Also, a formal process of gathering pertinent data will be developed to regularly update EOC and governmental stakeholders contact information.*

*The allocation of personnel and emergency response resources will be made on storm or catastrophic event priorities based on ESRP and, eventually, the SERP.*

**Recommendation 15:** Include the Commission Manager of Consumer Services regularly on service outage update communication and restoration progress.

*GMOC will work to develop a communication plan for the Consumer Services Department during major outages and events.*

**Recommendation 16:** Review its February 29, 2008 report and address the areas of improvement identified in a timely manner but no later than the next winter period.

*In conjunction with Item 2, all reports and reviews from the December 2007 storm will be reviewed by November 15, 2008. GMOC will evaluate and implement items identified as best practices and applicable to GMOC's storm response procedures and systems.*

**Recommendation 17:** Revise the Vegetation Management Standard to incorporate the Commission's Electrical Corporation Vegetation Management Standards and Reporting Requirements, 4 CSR 240-23.030, which became effective on June 30, 2008.

*GMOC filed its Vegetation Management Compliance Plan with the Commission on July 5, 2008, and is waiting for Commission review of the plan. The plan addresses and incorporates the changes required under the vegetation management standards rule. KCPL is also reviewing GMOC's plan.*

**Recommendation 18:** Revise the Company's Operation Standards to incorporate the Commission's Electrical Corporation Infrastructure Standards, 4 CSR 240-23.020, which became effective on June 30, 2008.

*GMOC filed its Infrastructure Standards Compliance Plan with the Commission on July 5, 2008, and is waiting for Commission review of the plan. The plan addresses and incorporates the changes required under the infrastructure standards rule. KCPL is also reviewing the GMOC plan.*

Respectfully submitted,

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Dated: August 15<sup>th</sup>, 2008

### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, postage prepaid, this 15<sup>th</sup> day of August, 2008, to:

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