

James M. Fischer Larry W. Dority

## Attorneys at Law Regulatory & Governmental Consultants

101 Madison, Suite 400 Jefferson City, MO 65101 Telephone: (573) 636-6758 Fax: (573) 636-0383

March 28, 2001

Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission 200 Madison Street, Suite 100 P.O. Box 360 Jefferson City, Missouri 65102

RE:

Kansas City Power & Light Company

Hawthorn Station Incident, Case No. ES-99-581

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are the original and eight (8) copies of the Response of Kansas City Power & Light Company to the Public Service Commission's Order Directing Response. A copy of the foregoing Response has been hand-delivered or mailed this date to each party of record.

Thank you for your attention to this matter.

es M. Fischer
By: Judy Carpolds James M. Fischer

/jr

cc:

Enclosure(s)

Martha Hogerty, Office of the Public Counsel

Dana Joyce, General Counsel

## DEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

F		E	<b>/</b> )2
MAR	28	200	
//			•

In the Matter of Kansas City Power & Light Company Regarding an	)	Service Commission	
Incident at the Hawthorn Station, Kansas City, Missouri, on February 17,	) }	Case No. ES-99-581	-oww.legion
1999	)		

## **RESPONSE OF KANSAS CITY POWER & LIGHT COMPANY**

COMES NOW Kansas City Power & Light Company ("KCPL") in response to the Order Directing Response issued by the Public Service Commission of the State of Missouri ("Commission") dated February 1, 2001. In support of its response, KCPL states the following:

- 1. On February 26, 2001, the Commission's staff ("Staff") filed its Evaluation of Kansas City Power & Light Company's System Performance and Employee Safety and Training Programs ("Report"). In its Report, Staff sought to measure the performance of KCPL's generation, transmission and distribution systems. In addition, Staff examined KCPL's safety and training programs.
  - 2. In its Report, Staff made the following conclusions:
    - KCPL's total base-load generation performed acceptably;
    - B. Staff's investigation of KCPL's transmission system did not uncover any evidence that indicates the performance of KCPL's transmission system is not acceptable;
    - C. Excluding distribution outages caused by severe weather, Staff's investigation of KCPL's transmission system did not uncover any evidence that indicates the performance of KCPL's distribution system is not acceptable; and
    - D. After an extensive review of training materials prepared by KCPL and KCPL's safety policies and procedures, Staff did not find any deficiencies in KCPL's training procedures.



3. KCPL concurs with the overall findings contained in the Report.

WHEREFORE, for the foregoing reasons, KCPL respectfully requests that the Commission accept KCPL's response to Staff's Evaluation of Kansas City Power & Light Company's System Performance and Employee Safety and Training Programs.

Respectfully submitted,

lames M. Fischer, Esq.

MBN 27543

FISCHER & DORITY, P.C.

1/01 Madison Street, Suite 400

Jefferson City, MO 65101

Telephone: (573) 636-6758 (573) 636-0383 Facsimile:

E-mail:

jfischerpc@aol.com

and

Gerald A. Reynolds

KBN 00007

Senior Regulatory Counsel

KANSAS CITY POWER & LIGHT COMPANY

1201 Walnut

Kansas City, MO 64106

Telephone: (816) 556-2785

Facsimile:

(816) 556-2787

E-mail

gerald.reynolds@kcpl.com

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

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing Response has been hand delivered or mailed via U.S. Mail, postage prepaid, this 28<sup>th</sup> day of March 2001, to:

Dana Joyce, General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, Missouri 65102

Martha Hogerty, Public Counsel Office of the Public Counsel P.O. Box 7800 Jefferson City, Missouri 65102

James M. Fische