



October 25, 2010

Via Electronic Filing

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

RE: *KCP&L Greater Missouri Operations Co.*, Docket No. ER11-____-000
Attachment L Compliance Filing

Dear Secretary Bose:

In compliance with Order No. 890¹ and the order issued by the Commission on August 24, 2010 (“August 24 Order”),² KCP&L Greater Missouri Operations Company (“KCP&L-GMO”)³ hereby submits a revised “Attachment L”⁴ for its Open Access Transmission Tariff, FERC Electric Tariff, Seventh Revised Volume No. 24 (“OATT”). The Attachment L submission incorporates revisions to the transmission planning processes of KCP&L-GMO. The August 24 Order accepted KCP&L-GMO’s tariff sheets that were submitted on June 1, 2009, as modified, subject to a further compliance filing. The August 24 Order directed KCP&L-GMO to submit (within 60 days) a revised Attachment L, subject to a handful of specific changes. KCP&L-

¹ *Preventing Undue Discrimination and Preference in Transmission Serv.*, Order No. 890, FERC Stats. & Regs. ¶ 31,241, *order on reh’g and clarification*, Order No. 890-A, FERC Stats. & Regs. ¶ 31,261 (2007), *order on reh’g and clarification*, Order No. 890-B, FERC Stats. & Regs. ¶ 31,241 (2008), *order on reh’g*, Order No. 890-C, 126 FERC ¶ 61,228, *order on clarification*, Order No. 890-D, 129 FERC ¶ 61,126 (2009) (codified at 18 C.F.R. pts. 35 and 37).

² *KCP&L Greater Missouri Operations Co.*, 132 FERC ¶ 61,162 (2010).

³ After the original order in this proceeding was issued by the Commission, the name “Aquila, Inc.” was changed to “KCP&L-GMO” as part of a transaction, authorized by the Commission in Docket Nos. EC07-99-000 and EL07-75-000, wherein Great Plains Energy, Inc., the parent company of Kansas City Power & Light Company acquired Aquila, Inc. and its electric utility operations in Missouri. *See KCP&L-GMO Greater Missouri Operations Co.*, Docket No. ER09-304-000 (unpublished delegated letter order issued Jan. 13, 2009) (accepting Notice of Succession filing).

⁴ KCP&L-GMO labeled its transmission planning process as “Attachment L.” This was permitted by the Commission in Order No. 890. *See Order No. 890*, FERC Stats. & Regs. ¶ 31,241 at P 437 n.246.

GMO requests an effective date of June 12, 2009, as accepted in the August 24 Order in Docket No. OA08-18-001.⁵

By way of background, and as noted in the August 24 Order, subsequent to the June 1, 2009 filing in this docket KCP&L-GMO terminated its L&P OATT and revised its MPS OATT to consolidate the services under the former L&P and MPS OATT under one KCP&L-GMO OATT.⁶ Accordingly, KCP&L-GMO's revisions are for the one KCP&L-GMO OATT.

Attached to this transmittal letter, KCP&L-GMO provides the proposed Attachment L in RTF format with metadata attached, and the clean and marked versions of Attachment L to be published in eLibrary.

KCP&L-GMO has posted a copy of this filing on the company's OASIS site. If you have any questions related to this compliance filing, please contact David Douglass.

Respectfully submitted,

/s/ David Douglass

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All parties in Docket No. OA08-18-000.

⁵ August 24 Order at P 44.

⁶ *Id.* at P 5.

ATTACHMENT L
Transmission Planning Process

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1.0 Introduction

FERC Order 890, among other things, requires an open, transparent and coordinated transmission planning process on both the local and regional level. Transmission providers and owners are to accomplish this by employing nine transmission planning principles that are intended to reduce the possibility of undue discrimination by transmission providers and owners in the transmission planning process. This document is intended to describe how KCP&L Greater Missouri Operations Company (“KCPL-GMO” or “GMO”) as a member of the Southwest Power Pool (“SPP”) participates in the SPP transmission planning process as described in Attachment O to the SPP Open Access Transmission Tariff (as revised in compliance with Order 890).

SPP performs the Reliability Coordinator and the Planning Coordinator functions for GMO. As such, SPP coordinates development of transmission planning models, transmission expansion plans, transmission assessments, generator interconnection studies, and flowgate calculation of Available Transmission Capacity. GMO also is a member of the SPP Reserve Sharing group.

Although GMO provides specific “grandfathered” networks transmission service to a handful of transmission customers, all new requests for access (networks or point-to-point) to the GMO transmission system are made through the SPP Open Access Transmission Tariff (“SPP OATT”).

In July 2008 GMO was acquired by Great Plains Energy (also the parent of Kansas City Power & Light Company (“KCP&L”). Since that time, GMO’s transmission planning group has been combined with KCP&L’s. GMO and KCP&L (“the Companies”) have established and maintain a “*Bulk Electric System Planning Criteria*” document (“Criteria Document”) that describes how the Companies comply with North American Reliability Corporation (“NERC”), FERC and SPP transmission planning criteria. The Criteria Document presents the characteristics of a well-planned bulk power electric system, describes the basis for model testing, and lists the reliability and adequacy tests the Companies utilize to evaluate the performance of its bulk electric system. The Criteria Document also defines the Companies’ more stringent transmission planning requirements for its local area. The Criteria Document is clearly posted on the public side of both the GMO and the KCP&L OASIS sites. The Criteria Document is reviewed periodically and also is submitted to FERC as part of FERC’s Form 715 (*Annual Transmission Planning and Evaluation*) report.

2.0 RTO Membership and Functional Control

KCPL-GMO is a member of the Southwest Power Pool which is a FERC-approved regional transmission organization (“RTO”). KCPL-GMO as a transmission owning member has placed its transmission system under the functional control of SPP. Through its annual SPP Transmission Expansion Plan (“STEP”) and other integrated regional planning processes, SPP performs coordinated and transparent regional planning for all transmission facilities in its multi-state SPP footprint. The SPP STEP process develops a 10-year plan for transmission expansion needed for reliability or economic purposes. The processes are described in Attachment O of the SPP OATT. As a Transmission Provider, KCPL-GMO fully participates in the SPP transmission planning process as outlined in Attachment O to the SPP OATT (as revised in compliance with

Order 890). It is through the SPP regional planning processes that most of the KCPL-GMO transmission planning for its transmission system complies with FERC's Order 890 planning principles.

KCPL-GMO conducts transmission planning to identify improvements necessary to ensure the adequacy and reliability of its system, and to provide transmission capacity for existing and new loads, and existing and new electric supply resources. KCPL-GMO also conducts local transmission planning to ensure the adequacy and reliability of its system for the benefit of interconnected entities and transmission customers that utilize the KCPL-GMO transmission system facilities to receive transmission service. GMO's transmission planning focus is local and sub-regional planning at lower voltage network planning, while the SPP STEP process focus is on inter-regional and intra-regional transmission planning.

3.0 Nine Planning Principals

3.1 Coordination

KCPL-GMO satisfies the coordination principle through its direct and active participation in the SPP coordinated planning process. KCPL-GMO participates in the SPP coordinated planning process by participation in SPP working groups such as the Transmission Working Group (TWG) and the Model Development Working Group (MDWG) which are responsible for development of a regionwide transmission plan. All details for such coordinated planning process, including relevant meeting and communication notice, schedule, and participation information, are set out in detail in Attachment O to the SPP OATT (as revised in compliance with Order 890).

KCPL-GMO transmission planning for reliability standards compliance is performed for all planning horizons: operational (real time to 1 year in future), near term (1 to 5 years in the future), and long term (5 to 10 years in the future). That planning generally involves the analysis of the transmission system under various operating conditions, the identification of any reliability standard violations, and the development plans or actions to mitigate each violation.

KCPL-GMO actively participates in and utilizes the SPP sub-regional planning meetings for its transmission planning cycle for any lower-voltage or local transmission planning. KCPL-GMO's specific planning timelines and schedules, and the planning cycle are associated with the SPP sub-regional planning meetings. Specifics are stated in SPP's "Integrated Transmission Planning Model" document, which is posted by SPP on its Internet site. At minimum it specifies that local planning meetings shall take place at least once per year. Through the SPP sub-regional planning process KCPL-GMO customers and other stakeholders are able to provide timely and meaningful input regarding the development of transmission plans and to participate in the development of transmission planning.

There are occasions when due to load growth or a new large load that the KCPL-GMO transmission planners may determine a need for a transmission addition or modification that has not been identified in the SPP planning process. In such cases any such proposed

addition or modification is submitted to the SPP for inclusion in the SPP STEP. Any such proposed addition or modification would also be included in subsequent planning models through the SPP model development process.

KCPL-GMO's transmission planning for capacity expansion to serve loads and new supply resources are performed for both the near term and the long term planning horizons. The Companies' transmission planning group interfaces with the planning performed by the Distribution Provider and Resources Planner functions of the NERC Reliability Functional Model. The Distribution Provider provides input on the size and location of loads to the transmission planning process. The Resource Planner provides the size and locations of future resources through the SPP process. Long term transmission planning is performed to develop an overall plan for expansion of the transmission system. This includes approximate capacity and location of transmission assets required for future operations. Near term transmission planning is performed to refine portions of the long-term transmission plan on localized areas and to provide more definition of required transmission assets.

A retail native-load transmission customer or wholesale transmission customer of KCPL-GMO can request a meeting (or meetings) in order to address transmission planning with regard to additional load requirements or new loads. To schedule a meeting they are to contact the manager of transmission planning, Harold Wyble, via e-mail at harold.wyble@kcpl.com or via telephone at 816-654-1213. KCPL-GMO does not maintain a formal standing committee for the local transmission planning process. However, KCPL-GMO may create and dissolve *ad hoc* committees to address specific issues, as GMO deems necessary at its sole discretion.

Further, a transmission customer or stakeholder may request additional meetings during the year to discuss various issues that are developed by KCPL-GMO, stakeholders, or SPP. However, KCPL-GMO shall not be obligated to conduct additional meetings if, in its sole discretion, GMO believes such topics may be adequately addressed through SPP-sponsored sub-regional planning meetings or through direct input to the SPP STEP process. Presentations about the Companies' transmission planning are provided by KCPL-GMO at SPP-sponsored sub-regional planning meetings. Stakeholders in GMO's local planning process are encouraged to participate directly in the SPP sub-regional planning process.

Any meetings organized by KCPL-GMO at the request of others will be based on prepared agendas. Topics for the meeting agenda may be suggested by notifying the Companies' manager of transmission planning, or designee, at least 30 days prior to the meeting date. KCPL-GMO will circulate the meeting agenda and other pertinent information to stakeholders via e-mail no fewer than 10 calendar days prior to the date of its meetings. Agendas for meetings also will be posted on the GMO OASIS site.

KCPL-GMO will coordinate any such planning meetings, preside over such meetings, and keep minutes of the meetings. Meetings will be conducted in a way to solicit and encourage input on the agenda items. Information developed in the meetings will be

incorporated into GMO presentations at SPP-sponsored sub-regional transmission planning meetings and/or forwarded to SPP for consideration in the SPP STEP.

3.2 Openness

KCPL-GMO complies with the openness principle by providing data and participation in the various SPP planning working groups such as the Regional Transmission Working Group (“RTWG”) and MDWG. Rules and procedures regarding openness issues, including access, participation and confidentiality, are all set out in detail in Attachment O to the SPP OATT (as revised in compliance with Order 890).

With respect to local planning projects such as those described in Section 3.1 above, KCPL-GMO shall actively and directly communicate with any affected transmission owner, its transmission agent or the requesting transmission customer, as needed. KCPL-GMO describes in prior sections of the document its processes for transmission customers and stakeholders to request meetings or to submit information with regard to additional load requirements, new loads or other interconnections. Requirements and the types of information studied are detailed in the Criteria Document posted on the GMO OASIS site. Any stakeholder that wants to be notified or included in those meetings can submit their request to the KCPL-GMO manager of transmission planning. Through these meetings customers and other stakeholders have the opportunity to provide input, review data and see KCPL-GMO local transmission planning studies prior to a study becoming final or submitted to SPP for inclusion in its sub-regional planning process.

KCPL-GMO will post the results of planning studies completed for such projects on KCPL-GMO’s OASIS to further allow all stakeholders an opportunity to review the studies. Any commercially sensitive data or critical information will be kept confidential. Stakeholders or other customers can obtain that confidential data by contacting the KCPL-GMO manager of transmission planning in order to execute the appropriate nondisclosure and confidentiality agreement to obtain such data. More details are provided in Section 3.3 – Transparency.

As noted above, these projects will also be included in KCPL-GMO’s presentations at the SPP-sponsored sub-regional transmission planning meetings and/or submitted to SPP for inclusion in the SPP STEP and thus will be subject to the SPP openness procedures.

3.3 Transparency

KCPL-GMO complies with the transparency principle through adherence to the SPP transmission study methodology, criteria and process and its direct and active participation in the SPP coordinated planning process. Rules and procedures regarding transparency issues, including planning cycle, milestones, methodology, protocols, communications procedures, and information sharing procedures, are all set out in detail in Attachment O to the SPP OATT (as revised in compliance with Order 890).

For local planning issues, KCPL-GMO has posted on its OASIS its “*Bulk Electric System Planning Criteria*” document that describes how GMO complies with North American Reliability Corporation (“NERC”), FERC and SPP transmission planning criteria. The

Criteria Document presents the characteristics of a well-planned bulk power electric system, describes the basis for model testing, and lists the reliability and adequacy tests to be used to evaluate the performance of the GMO bulk electric system. The Criteria Document also further defines GMO's more stringent transmission planning requirements for its local area. The Criteria Document is clearly posted on the public side of both the GMO and the KCP&L OASIS sites. This document is reviewed periodically and also is submitted to FERC as part of FERC's Form 715 (*Annual Transmission Planning and Evaluation*) report. Beyond the information included in Form 715, KCPL-GMO generally does not post any CEII information on the public or certificate-required sides of its OASIS. Instead this information is included in the SPP Transmission Planning process.

Stakeholders seeking the FERC Form 715 and any other information labeled "Critical Energy Infrastructure Information" ("CEII") may request access to the information through several options. Stakeholders and other customers can submit a written request to the FERC CEII Coordinator. The written request must include the required information specified by FERC. Additionally, SPP makes available on its website at the following link: <http://www.spp.org/section.asp?pageID=108>, information regarding requests for CEII information or other confidential or non-confidential related study materials. Stakeholders also can contact the KCPL-GMO manager of transmission planning to request KCPL-GMO specific CEII-labeled information. Requestors will be required to execute appropriate nondisclosure and confidentiality agreement to obtain such information.

As part of meetings hosted by KCPL-GMO that may be requested by stakeholders, through direct communication with stakeholders, or through SPP-sponsored sub-regional transmission planning meetings, KCPL-GMO will request and consider assumptions that should be included in the local planning process. In-house study results will be made available on KCPL-GMO's OASIS along with any required data including load flow models such that any stakeholder will be able to replicate the results.

GMO's transmission expansion plans primarily relate to load serving, lower-voltage expansion not overseen by SPP, and generation interconnection studies on radial transmission or distribution facilities. Criteria, assumptions and other underlying data normally will be provided in the study report for that plan or study when it is released. However, requests for transmission service or for a new load interconnection generally are confidential. The information related to the project cannot be shared with other entities until the project is publicly announced.

3.4 Information Exchange

KCPL-GMO satisfies the information exchange principle through its direct and active participation in the SPP coordinated planning process. KCPL-GMO submits all load data, generation data and system data to SPP as part of its participation in the SPP model development process. This information is provided on an annual basis pursuant to the SPP model development process. Rules and procedures regarding information exchange

issues, including data and information submission procedures, are all set out in detail in Attachment O to the SPP OATT (as revised in compliance with Order 890).

Throughout the transmission planning process KCPL-GMO welcomes participation by sponsors of transmission solutions, generation solutions, or other solutions utilizing demand resources. Participation is encouraged through steps outlined in Section 3.1 – Coordination and through the SPP sub-regional transmission planning process. Specific types of information required by KCPL-GMO and when that information must be submitted to KCPL-GMO are detailed in its “KCPL Facility Connection Standards” posted on its OASIS site.

3.5 Comparability

KCPL-GMO satisfies the comparability principle through its direct and active participation in the SPP coordinated planning process. Through KCPL-GMO’s participation in the SPP STEP, SPP-sponsored sub-regional transmission planning meetings, and the SPP Aggregate Study Process comparability between all customers on the KCPL-GMO transmission system is ensured. KCPL-GMO adheres to procedures regarding comparability issues as set out in detail in Attachment O to the SPP OATT (as revised in compliance with Order 890). KCPL-GMO plans for load and generation throughout the KCPL-GMO transmission system in a manner comparable to planning for its native loads. Any studies performed by GMO are based on the most recent SPP STEP Study. GMO’s wholesale customers submit a transmission service request through the SPP OASIS.

Impacts on neighboring transmission systems are included in KCPL-GMO network transmission service studies. SPP and the affected owner or owners of a neighboring transmission system will be consulted to resolve any potential impacts identified.

SPP planning procedures recognize that SPP and its members need to address transmission system requirements to meet state renewable portfolio standards, state resource adequacy and demand response requirements, and other similar regulatory programs that could include treatment of customer demand response resources. All stakeholders, including sponsors of transmission, generation and demand resources, can participate in local planning discussion through planning meetings held by KCPL-GMO or through SPP-sponsored sub-regional transmission planning meetings. KCPL-GMO will consider verified demand response, if available, when evaluating transmission project alternatives in the local study planning process.

Sponsors of transmission, generation and demand resources can propose alternative transmission solutions, potential generation solutions or potential demand resource solutions to any needs identified by KCPL-GMO in its transmission planning process. These sponsors may submit a request to the KCPL-GMO manager of transmission planning for a meeting to discuss proposed alternative solutions. These solutions will be evaluated against each other based on a comparison of their relative economics and effectiveness of performance. In evaluating alternatives, including demand responses and transmission alternatives, KCPL-GMO will evaluate alternatives on the basis of the following:

- (1) ability to mitigate any criteria or NERC Planning Standard issues;
- (2) ability to mitigate those issues over the time frames of the study;
- (3) comparison of the capital costs of the demand response, as compared to other transmission alternatives;
- (4) the technical, financial and operational feasibility of any proposed alternatives; and
- (5) comparison of any operational benefits or issues between demand responses or transmission alternatives. From this comparison, the most appropriate project alternative can be selected.

3.6 Dispute Resolution

KCPL-GMO transmission service customers taking service under the SPP OATT or that are disputing the results of an SPP STEP planning process shall utilize the dispute resolution processes set forth in the SPP OATT in Section 12. Additionally, KCPL-GMO has a dispute resolution process that is defined in Section 12 of its Tariff. Disputes arising under the Transmission Planning Process in this Attachment L shall be subject to the Dispute Resolution Procedures in Section 12 of the KCPL-GMO OATT. The resolution procedures may include informal negotiation, facilitated mediation, or arbitration. All mediations and/or arbitrations arising from disputes under this Attachment L shall be held in Kansas City, Missouri, unless otherwise agreed to by the parties.

3.7 Regional Participation

KCPL-GMO complies with the regional participation principle through its participation in SPP which includes all neighboring transmission providers such as AECI or SPA. SPP also coordinates planning with neighboring regions such as MISO and ERCOT. Rules and procedures regarding regional participation issues are all set out in detail in Attachment O to the SPP OATT (as revised in compliance with Order 890).

3.8 Economic Planning Studies

KCPL-GMO satisfies the economic planning principle by utilizing the SPP regional economic planning process. KCPL-GMO supplies economic data for the KCPL-GMO transmission system for use in these economic evaluations. As a part of this process, KCPL-GMO planning engineers assess the various alternatives that potentially could reduce transmission project costs, which in turn result in energy savings for the customer. Rules and procedures regarding economic planning studies issues, including the scope, process and mechanism for cost recovery for such studies, are all set out in detail in Attachment O to the SPP OATT (as revised in compliance with Order 890).

The focus of KCPL-GMO's transmission planning is to identify improvements necessary to ensure the adequacy and reliability of its system, and to provide transmission capacity for existing and new loads, and existing and new electric supply resources. KCPL-GMO also conducts local transmission planning to ensure the adequacy and reliability of its system for the benefit of interconnected entities and transmission customers that utilize the KCPL-GMO transmission system facilities to receive transmission service. GMO's transmission planning focuses on local and sub-regional planning at lower voltage

network planning. If a stakeholder submits a request for an economic planning study, KCPL-GMO shall forward such request to SPP for inclusion by SPP in its economic planning studies. KCPL-GMO shall not perform any economic planning studies unless directed to do so by SPP in accordance with Attachment O to the SPP OATT. The costs for such studies shall be allocated pursuant to Attachment O of the SPP OATT.

3.9 Cost Allocation for New Projects

KCPL-GMO satisfies the cost allocation for new projects principle through its direct and active participation in the SPP coordinated planning process. SPP has a process presently in place for dealing with cost allocation for transmission projects. In addition, there is also an SPP working group that deals with cost allocation. Rules and procedures regarding cost allocation for new project issues, including cost allocation methodology and the roles and responsibilities of the SPP and stakeholders, are all set out in detail in Attachment O to the SPP OATT (as revised in compliance with Order 890).

KCPL-GMO's local planning projects that are justified for construction through local planning studies and authorized by KCPL-GMO's internal budget process are submitted to SPP for inclusion in the SPP Expansion Plan. Those projects are subject to the same cost allocation process as projects in the Expansion Plan that are generated by the SPP regional transmission planning process.

4.0 Recovery of Planning Costs

SPP recovers the cost of transmission planning through appropriate schedules in the SPP OATT. The costs for any economic planning studies performed by KCPL-GMO at the direction of SPP shall be recovered pursuant to Attachment O of the SPP OATT. For the costs of studies associated with specific wholesale delivery points by customers taking service under the SPP OATT, the requesting customer shall be responsible for the actual costs of such studies.

KCPL-GMO's costs for studies on its own behalf as part of the local transmission plan are not directly assigned. Labor costs are accounted through standard FERC account codes.

Costs incurred by KCPL-GMO while completing a planning study or a special study as described below at the request of a stakeholder as part of the KCPL-GMO local transmission processes will be borne by the specific stakeholder(s). As detailed in various sections of KCPL-GMO's OATTs, an agreement to complete a transmission planning study will clearly specify an estimate of the actual cost and time for completion of the study. The customer is billed after the study is complete, with the final charge not exceeding the actual cost of the study. To the extent reasonably practicable, existing transmission planning studies shall be relied upon. The customer will not be assessed a charge for such existing studies. However, the stakeholder(s) will be responsible for charges associated with any modifications to existing planning studies that are reasonably necessary to evaluate the impact of the customer's request for service. Time worked and any other costs are tracked and assigned to the appropriate stakeholder or customer record.

The costs for any special study requested by a stakeholder that is not an economic upgrade shall be borne by the specific stakeholder(s). The same recovery of planning costs procedures

previously mentioned for a study as part of the local transmission planning processes will be followed. KCPL-GMO defines “special study” as a study requested by a stakeholder that is required to be completed outside of the set SPP planning study process cycle. Additionally, a “special study” could be required when working with facilities of a lower voltage potentially not covered in SPP’s “Integrated Transmission Planning Model” document, which is posted by SPP on its Internet site.

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3.0 Nine Planning Principals

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KCPL-GMO's transmission planning for capacity expansion to serve loads and new supply resources are performed for both the near term and the long term planning horizons. The Companies' transmission planning group interfaces with the planning ~~performed~~ performed by the Distribution Provider and Resources Planner functions of the NERC Reliability Functional Model. The Distribution Provider provides input on the size and location of loads to the transmission planning process. The Resource Planner provides the size and locations of future resources through the SPP process. Long term transmission planning is performed to develop an overall plan for expansion of the transmission system. This includes approximate capacity and location of transmission assets required for future operations. Near term transmission planning is performed to refine portions of the long-term transmission plan on localized areas and to provide more definition of required transmission assets.

A retail native-load transmission customer or wholesale transmission customer of KCPL-GMO can request a meeting (or meetings) in order to address transmission planning with regard to additional load requirements or new loads. To schedule a meeting they are to contact the manager of transmission planning, Harold Wyble, via e-mail at harold.wyble@kcpl.com or via telephone at 816-654-1213. KCPL-GMO does not maintain a formal standing committee for the local transmission planning process. However, KCPL-GMO may create and dissolve *ad hoc* committees to address specific issues, as GMO deems necessary at its sole discretion.

Further, a transmission customer or stakeholder may request additional meetings during the year to discuss various issues that are developed by KCPL-GMO, stakeholders, or SPP. However, KCPL-GMO shall not be obligated to conduct additional meetings if, in its sole discretion, GMO believes such topics may be adequately addressed through SPP-sponsored sub-regional planning meetings or through direct input to the SPP STEP process. Presentations about the Companies' transmission planning are provided by KCPL-GMO at SPP-sponsored sub-regional planning meetings. Stakeholders in GMO's local planning process are encouraged to participate directly in the SPP sub-regional planning process.

Any meetings organized by KCPL-GMO at the request of others will be based on prepared agendas. Topics for the meeting agenda may be suggested by notifying the Companies' manager of transmission planning, or designee, at least 30 days prior to the meeting date. KCPL-GMO will circulate the meeting agenda and other pertinent information to stakeholders via e-mail no fewer than 10 calendar days prior to the date of its meetings. Agendas for meetings also will be posted on the GMO OASIS site.

KCPL-GMO will coordinate any such planning meetings, preside over such meetings, and keep minutes of the meetings. Meetings will be conducted in a way to solicit and encourage input on the agenda items. Information developed in the meetings will be incorporated into GMO presentations at SPP-sponsored sub-regional transmission planning meetings and/or forwarded to SPP for consideration in the SPP STEP.

3.2 Openness

KCPL-GMO complies with the openness principle by providing data and participation in the various SPP planning working groups such as the Regional Transmission Working Group ("RTWG") and MDWG. Rules and procedures regarding openness issues, including access, participation and confidentiality, are all set out in detail in Attachment O to the SPP OATT (as revised in compliance with Order 890).

With respect to local planning projects such as those described in Section 3.1 above, KCPL-GMO shall actively and directly communicate with any affected transmission owner, its transmission agent or the requesting transmission customer, as needed. KCPL-GMO describes in prior sections of the document its processes for transmission customers and stakeholders to request meetings or to submit information with regard to additional load requirements, new loads or other interconnections. Requirements and the types of information studied are detailed in the Criteria Document posted on the GMO OASIS site. Any stakeholder that wants to be notified or included in those meetings can submit their request to the KCPL-GMO manager of transmission planning. Through these meetings customers and other stakeholders have the opportunity to provide input, review data and see KCPL-GMO local transmission planning studies prior to a study becoming final or submitted to SPP for inclusion in its sub-regional planning process.

KCPL-GMO will post the results of planning studies completed for such projects on KCPL-GMO's OASIS ~~so that~~ to further allow all stakeholders ~~have an~~ opportunity to review the studies. Any commercially sensitive data or critical information will be kept confidential. Stakeholders or other customers can obtain that confidential data by contacting the KCPL-GMO manager of transmission planning in order to execute the appropriate nondisclosure and confidentiality agreement to obtain such data. More details are provided in Section 3.3 – Transparency.

As noted above, these projects will also be included in KCPL-GMO's presentations at the SPP-sponsored sub-regional transmission planning meetings and/or submitted to SPP for inclusion in the SPP STEP and thus will be subject to the SPP openness procedures.

3.3 Transparency

KCPL-GMO complies with the transparency principle through adherence to the SPP transmission study methodology, criteria and process and its direct and active participation in the SPP coordinated planning process. Rules and procedures regarding transparency issues, including planning cycle, milestones, methodology, protocols, communications procedures, and information sharing procedures, are all set out in detail in Attachment O to the SPP OATT (as revised in compliance with Order 890).

For local planning issues, KCPL-GMO has posted on its OASIS its "*Bulk Electric System Planning Criteria*" document that describes how GMO complies with North American Reliability Corporation ("NERC"), FERC and SPP transmission planning criteria. The Criteria Document presents the characteristics of a well-planned bulk power electric system, describes the basis for model testing, and lists the reliability and adequacy tests to be used to evaluate the performance of the GMO bulk electric system. The Criteria Document also further defines GMO's more stringent transmission planning requirements for its local area. The Criteria Document is clearly posted on the public side of both the GMO and the KCP&L OASIS sites. This document is reviewed periodically and ~~and~~ also is submitted to FERC as part of FERC's Form 715 (*Annual Transmission Planning and Evaluation*) report. Beyond the information included in Form 715, KCPL-GMO generally does not post any CEII information on the public or certificate-required sides of its OASIS. Instead this information is included in the SPP Transmission Planning process.

Stakeholders seeking the FERC Form 715 and any other information labeled "Critical Energy Infrastructure Information" ("CEII") may request access to the information through several options. Stakeholders and other customers can by submitting a written request to the ~~the~~ FERC CEII Coordinator. The written request must include the required information specified by FERC. Additionally, SPP makes available on its website at the following link: <http://www.spp.org/section.asp?pageID=108>, information regarding requests for CEII information or other confidential or non-confidential related study materials. Stakeholders also can contact the KCPL-GMO manager of transmission planning to request KCPL-GMO specific CEII-labeled information. Requestors will be required to execute appropriate nondisclosure and confidentiality agreement to obtain such information.

As part of meetings hosted by KCPL-GMO that may be requested by stakeholders, through direct communication with stakeholders, or through SPP-sponsored sub-regional transmission planning meetings, KCPL-GMO will request and consider assumptions that should be included in the local planning process. In-house study results will be made available on KCPL-GMO's OASIS along with any required data including load flow models such that any stakeholder will be able to replicate the results.

GMO's transmission expansion plans primarily relate to load serving, lower-voltage expansion not overseen by SPP, and generation interconnection studies on radial transmission or distribution facilities. Criteria, assumptions and other underlying data normally will be provided in the study report for that plan or study when it is released. However, requests for transmission service or for a new load interconnection generally are confidential. The information related to the project cannot be shared with other entities until the project is publicly announced.

3.4 Information Exchange

KCPL-GMO satisfies the information exchange principle through its direct and active participation in the SPP coordinated planning process. KCPL-GMO submits all load data, generation data and system data to SPP as part of its participation in the SPP model development process. This information is provided on an annual basis pursuant to the SPP model development process. Rules and procedures regarding information exchange issues, including data and information submission procedures, are all set out in detail in Attachment O to the SPP OATT (as revised in compliance with Order 890).

Throughout the transmission planning process KCPL-GMO welcomes participation by sponsors of transmission solutions, generation solutions, or other solutions utilizing demand resources. Participation is encouraged through steps outlined in Section 3.1 – Coordination and through the SPP sub-regional transmission planning process. Specific types of information required by KCPL-GMO and when that information must be submitted to KCPL-GMO are detailed in its “KCPL Facility Connection Standards” posted on its OASIS site.

3.5 Comparability

KCPL-GMO satisfies the comparability principle through its direct and active participation in the SPP coordinated planning process. Through KCPL-GMO's participation in the SPP STEP, SPP-sponsored sub-regional transmission planning meetings, and the SPP Aggregate Study Process comparability between all customers on the KCPL-GMO transmission system is ensured. KCPL-GMO adheres to procedures regarding comparability issues as set out in detail in Attachment O to the SPP OATT (as revised in compliance with Order 890). KCPL-GMO plans for load and generation throughout the KCPL-GMO

transmission system in a manner comparable to planning for its native loads. Any studies performed by GMO are based on the most recent SPP STEP Study. GMO's wholesale customers submit a transmission service request through the SPP OASIS.

Impacts on neighboring transmission systems are included in KCPL-GMO network transmission service studies. SPP and the affected owner or owners of a neighboring transmission system will be consulted to resolve any potential impacts identified.

SPP planning procedures recognize that SPP and its members need to address ~~transmission~~transmission system requirements to meet state renewable portfolio standards, state resource adequacy and demand response requirements, and other similar regulatory programs that could include treatment of customer demand response resources. All stakeholders, including sponsors of transmission, generation and demand resources, can participate in local planning discussion through planning meetings held by KCPL-GMO or through SPP-sponsored sub-regional transmission planning meetings. KCPL-GMO will consider verified demand response, if available, when evaluating transmission project alternatives in the local study planning process.

Sponsors of transmission, generation and demand resources can propose alternative transmission solutions, potential generation solutions or potential demand resource solutions to any needs ~~identified~~identified by KCPL-GMO in its transmission planning process. These sponsors ~~and~~ may submit a request to the KCPL-GMO manager of transmission planning for a meeting to discuss proposed alternative ~~transmission~~ solutions. These ~~transmission~~ solutions will be evaluated against each other based on a comparison of their relative economics and effectiveness of performance. ~~Standards to compare potential transmission solutions will be determined by KCPL-GMO and discussed directly with specific stakeholders.~~In evaluating alternatives, including demand responses and transmission alternatives, KCPL-GMO will evaluate alternatives on the basis of the following:

- (1) ability to mitigate any criteria or NERC Planning Standard issues;
- (2) ability to mitigate those issues over the time frames of the study;
- (3) comparison of the capital costs of the demand response, as compared to other transmission alternatives;
- (4) the technical, financial and operational feasibility of any proposed alternatives; and
- (5) comparison of any operational benefits or issues between demand responses or transmission alternatives. From this comparison, the most appropriate project alternative can be selected.

3.6 Dispute Resolution

KCPL-GMO transmission service customers taking service under the SPP OATT or that are disputing the results of an SPP STEP planning process shall utilize the

dispute resolution processes set forth in the SPP OATT in Section 12. Additionally, KCPL-GMO has a dispute resolution process that is defined in Section 12 of its Tariff. Disputes arising under the Transmission Planning Process in this Attachment L shall be subject to the Dispute Resolution Procedures in Section 12 of the KCPL-GMO OATT. The resolution procedures may include informal negotiation, facilitated mediation, or arbitration. All mediations and/or arbitrations arising from disputes ~~under~~under this Attachment L shall be held in Kansas City, Missouri, unless otherwise agreed to by the parties.

3.7 Regional Participation

KCPL-GMO complies with the regional participation principle through its participation in SPP which includes all neighboring transmission providers such as AECI or SPA. SPP also coordinates planning with neighboring regions such as MISO and ERCOT. Rules and procedures regarding regional participation issues are all set out in detail in Attachment O to the SPP OATT (as revised in compliance with Order 890).

3.8 Economic Planning Studies

KCPL-GMO satisfies the economic planning principle by utilizing the SPP regional economic planning process. KCPL-GMO supplies economic data for the KCPL-GMO transmission system for use in these economic evaluations. As a part of this process, KCPL-GMO planning engineers assess the various alternatives that potentially could reduce transmission project costs, which in turn result in energy savings for the customer. Rules and procedures regarding economic planning studies issues, including the scope, process and mechanism for cost recovery for such studies, are all set out in detail in Attachment O to the SPP OATT (as revised in compliance with Order 890).

The focus of KCPL-GMO's transmission planning is to identify improvements necessary to ensure the adequacy and reliability of its system, and to provide transmission capacity for existing and new loads, and existing and new electric supply resources. KCPL-GMO also conducts local transmission planning to ensure the adequacy and reliability of its system for the benefit of interconnected entities and transmission customers that utilize the KCPL-GMO transmission system facilities to receive transmission service. GMO's transmission planning focuses on local and sub-regional planning at lower voltage network planning. If a stakeholder submits a request for an economic planning study, KCPL-GMO shall forward such request to SPP for inclusion by SPP in its economic planning studies. KCPL-GMO shall not perform any economic planning studies unless directed to do so by SPP in accordance with Attachment O to the SPP OATT. The costs for such studies shall be allocated pursuant to Attachment O of the SPP OATT.

3.9 Cost Allocation for New Projects

KCPL-GMO satisfies the cost allocation for new projects principle through its direct and active participation in the SPP coordinated planning process. SPP has a process presently in place for dealing with cost allocation for transmission projects. In addition, there is also an SPP working group that deals with cost allocation. Rules and procedures regarding cost allocation for new project issues, including cost allocation methodology and the roles and responsibilities of the SPP and stakeholders, are all set out in detail in Attachment O to the SPP OATT (as revised in compliance with Order 890).

KCPL-GMO's local planning projects that are justified for construction through local planning studies and authorized by KCPL-GMO's internal budget process are submitted to SPP for inclusion in the SPP Expansion Plan. Those projects are subject to the same cost allocation process as projects in the Expansion Plan that are generated by the SPP regional transmission planning process.

4.0 Recovery of Planning Costs

SPP recovers the cost of transmission planning through appropriate schedules in the SPP OATT. The costs for any economic planning studies performed by KCPL-GMO at the direction of SPP shall be recovered pursuant to Attachment O of the SPP OATT. For the costs of studies associated with specific wholesale delivery points by customers taking service under the SPP OATT, the requesting customer shall be responsible for the actual costs of such studies.

KCPL-GMO's costs for studies on its own behalf as part of the local transmission plan policy are not directly assigned. Labor costs are accounted through standard FERC account codes.

Costs incurred by KCPL-GMO while completing a planning study or a special study as described below at the request of a stakeholder as part of the KCPL-GMO local transmission processes will be borne by the specific stakeholder(s). As detailed in various sections of KCPL-GMO's OATTs, an agreement to complete a transmission planning study will clearly specify an estimate of the actual cost and time for completion of the study. The customer is billed after the study is complete, with the final charge not exceeding the actual cost of the study. To the extent reasonably practicable, existing transmission planning studies shall be relied upon. The customer will not be assessed a charge for such existing studies. However, the stakeholder(s) will be responsible for charges associated with any modifications to existing planning studies that are reasonably necessary to evaluate the impact of the customer's request for service. Time worked and any other costs are tracked and assigned to the appropriate stakeholder or customer record.

The costs for any special study requested by a stakeholder that is not an economic upgrade shall be borne by the specific stakeholder(s). The same recovery of planning costs procedures previously mentioned for a study as part of the local transmission planning processes will be followed. KCPL-GMO defines "special study" as a study requested by a stakeholder that is required to be completed outside of the set SPP

planning study process cycle. Additionally, a “special study” could be required when working with facilities of a lower voltage potentially not covered in SPP’s “Integrated Transmission Planning Model” document, which is posted by SPP on its Internet site.