

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

1440 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-2111

TEL: (202) 371-7000
FAX: (202) 393-5760
www.skadden.com

DIRECT DIAL
(202) 371-7009
DIRECT FAX
(202) 393-5760
EMAIL ADDRESS
JPFEFFER@SKADDEN.COM

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June 1, 2009

By Electronic Filing

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

RE: *Aquila, Inc.*, Docket No. OA08-18-
Attachment L Compliance Filing

Dear Secretary Bose:

In compliance with Order No. 890 and the order issued by the Commission on February 17, 2009 ("February 17 Order")¹, KCP&L Greater Missouri Operations Company ("KCP&L-GMO" or "the Company")² hereby submits a revised "Attachment L" for each of its two filed Open Access Transmission Tariffs ("OATTs"). The Attachment L submissions incorporate revisions to the transmission planning processes

¹ *Aquila Inc.*, 126 FERC ¶ 61,128 (2009).

² The name of Aquila, Inc. was changed subsequent to the original filing in this docket to KCP&L-GMO as part of a transaction whereby Aquila, Inc. and its electric utility operations in Missouri were acquired by Great Plains Energy, the parent company of Kansas City Power & Light Company ("KCP&L"). The Commission approved a Notice of Succession reflecting this name change in a delegated letter order issued on January 13, 2009 in *KCP&L Greater Missouri Operations Co.*, Docket No. ER09-304-000.

of KCP&L-GMO's two Missouri operating divisions (MPS and L&P). The February 17 Order conditionally accepted the revised OATTs for these two divisions but directed KCP&L-GMO to submit (within 90 days) a revised "Attachment L" for inclusion in each of the tariffs.³ On May 12, 2009, the Commission granted KCP&L-GMO's request for an extension of the filing deadline until June, 1, 2009.

The proposed Attachment L revisions are included in this filing and are designated as KCP&L Greater Missouri Operations Company (MPS), Sixth Revised Volume No. 24 (labeled as Aquila Networks-MPS in the original filing), and KCP&L Greater Missouri Operations Company (L&P), Third Revised Volume No. 30 (labeled Aquila Networks-L&P in the original filing). Copies of the revised Attachment L also are posted on the Company's OASIS. The revised tariff language is presented in clean and redlined format as follows:

Attachment 1: Clean and revised sheets for Volume 24

Attachment 2: Redlined version of Volume 24

Attachment 3: Clean and revised sheets for Volume 30

Attachment 4: Redlined version of Volume 30

As KCP&L-GMO informed the Commission in its request for extension of the Compliance filing deadline, there have been several recent developments that are relevant to the Commission's consideration of the proposed revisions to its transmission planning procedures. First, as a result of KCP&L-GMO's recent acquisition by Great Plains Energy,⁴ the Company's transmission planning group has been consolidated with the transmission planning group of KCP&L, the other public utility subsidiary of Great Plains.

³ The February 17 Order also addressed the OATT filed in relation to Aquila's WPC division in Colorado, which is no longer affiliated with KCP&L-GMO and thus is not included in this compliance filing.

⁴ To reflect the acquisition by Great Plains, the Company filed extensive revisions to all of its filed tariffs (including the MPS and L&P OATTs) pursuant its Notice of Succession reflecting the name change from Aquila, Inc. to KCP&L-GMO. *See Designation of Electric Rate Schedule Sheets*, Order No. 614, FERC Stats. & Regs. ¶ 31,096 (2000). Revised and restated tariff sheets for each OATT were filed on April 13, 2009 in Docket No. ER09-304-001.

Second, KCP&L-GMO has now completed the full integration of its transmission facilities into the Southwest Power Pool ("SPP") and has terminated its relationships with the Midwest Independent Transmission System Operator, Inc. ("MISO") pursuant to a Commission order issued on May 1, 2009.⁵ As a result of this transition, the transmission facilities of MPS and L&P are now fully integrated with, and operated under the functional control of the SPP and have no relationship with MISO.

Third, on April 15, 2009, as amended on April 22, 2009, the SPP filed a Network Integration Service Agreement under the SPP OATT providing for Network Services with KCP&L-GMO as the Network Customer. That filing is pending Commission action in Docket Nos. ER09-1004-000 and ER09-1004-001.

Based on the foregoing developments, there have been significant changes in the circumstances governing the Company's transmission planning process. These changes are fully reflected in the revised Attachment L language. KCP&L-GMO submits that the revised language fully conforms with the requirements of Order No. 890 and applicable SPP guidelines and should be accepted as being in full compliance with the February 17 Order.

If you have any questions related to this request, please contact me at 202-371-7009.

Respectfully submitted,

/s/ Jerry L. Pfeffer

Jerry L. Pfeffer,

Energy Industries Advisor

Skadden, Arps, Slate, Meagher & Flom, LLP

1440 New York Ave., N.W.

Washington, DC 20005

Phone: (202) 371-7000

Curtis D. Blanc

Corporate Counsel

KCP&L Greater Missouri Operations Company

1201 Walnut – 20th Floor

Kansas City, MO 64106

Phone: (816) 556-2483

⁵ *Aquila, Inc.*, 127 FERC ¶ 61,102 (2009).

CERTIFICATE OF SERVICE

I hereby certify that I have on this day caused to be served a copy of the foregoing supplemental informational filing upon all parties designated on the official service list in these proceedings. Dated at Washington, D.C., this 1st day of June, 2009.

/s/ Jerry L. Pfeffer

Jerry L. Pfeffer

Skadden, Arps, Slate, Meagher & Flom LLP

1440 New York Ave., N.W.

Washington, DC 20005

(202) 371-7009

jpfeffer@skadden.com

Attachment 1

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 Principles

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.

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.

KCPL-GMO will post the results of planning studies completed for such projects on KCPL-GMO’s OASIS so that all stakeholders have an opportunity to review the studies. 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. Stakeholders seeking the FERC Form 715 and any other information labeled "Critical Energy Infrastructure Information" ("CEII") may request access to the information 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.

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).

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 to any needs identified by KCPL-GMO in its transmission planning process and may submit a request to the KCPL-GMO manager of transmission planning for a meeting to discuss proposed alternative transmission solutions. 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.

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 policy are not directly assigned. Labor costs are accounted through standard FERC account codes.

Costs incurred by KCPL-GMO while completing a planning study 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. 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.

Attachment 2

ATTACHMENT L

Transmission Planning Process

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Issued by: Chris Giles
Vice President, Regulatory Affairs
Issued on: ~~June 1, 2009~~ April 13, 2009

Effective: June 12, 2009

Filed to comply with order of the Federal Energy Regulatory Commission, Docket No. OA08-18-000, issued February 17, 2009, 126 FERC ¶ 61,128.

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 (“KCP&L-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).

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2.0 RTO Membership and Functional Control

KCP&L-GMO is a member of the Southwest Power Pool (SPP) which is a FERC-approved regional transmission organization (“RTO”). KCP&L-GMO as a transmission owning member has placed its transmission system under the functional control of SPP. Through

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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 OATTpen Access Transmission Tariff (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 OATTpen Access Transmission Tariff (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.

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 ~~Expansion Plan~~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.

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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~~Open Access Transmission Tariff (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.

KCPL-GMO will post the results of planning studies completed for such projects on KCPL-GMO’s OASIS so that all stakeholders have an opportunity to review the studies. 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 ~~expansion planning process~~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~~Open Access Transmission Tariff (as revised in compliance with Order 890).

~~For local planning issues as described in Section 3.1 above, KCPL-GMO applies all of these same SPP criteria, methodology, and processes for conducting local planning studies. KCPL-GMO uses the SPP load flow models for all in-house studies. 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. Stakeholders seeking the FERC Form 715 and any other information labeled "Critical Energy Infrastructure Information" ("CEII") may request access to the information 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.

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~~Open Access Transmission Tariff (as revised in compliance with Order 890).

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 Expansion Planning Process 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. Rules and KCPL-GMO adheres to procedures regarding comparability issues as set out in detail in Attachment O to the SPP OATT Open Access Transmission Tariff (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 to any needs identified by KCPL-GMO in its transmission planning process and may submit a request to the KCPL-GMO manager of transmission planning for a meeting to discuss proposed alternative transmission solutions. 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.

3.6 Dispute Resolution

KCPL-GMO transmission service customers taking service under the SPP OATT

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~~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, satisfies the dispute resolution principle through its direct and active participation in the SPP coordinated planning process. SPP has a dispute resolution process defined in Section 12 of its Tariff. Also~~ Additionally, KCPL-GMO has a dispute resolution process that is defined in Section 12 of its Tariff ~~as appropriate~~. Disputes arising under the Transmission Planning Process in this Attachment L shall be subject to the Dispute Resolution Procedures in Section 12 of tThe KCPL-GMO OATT. The resolution procedures may include informal negotiation, facilitated mediation, or arbitration. All mediations and/or arbitrations arising from disputes uner this Attachment L shall be held in Kansas City, Missouri, unless otherwise agreed to by the parties. ~~dispute resolution process would be used if a local planning dispute were to arise prior to submission of the local plan to the SPP.~~

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 OATTpen Access Transmission Tariff (as revised in compliance with Order 890).

3.8 Economic Planning Studies

~~KCPL-GMO satisfies the economic planning principle through its direct and active participation in the SPP coordinated planning process. Economics is a consideration that SPP includes in its transmission planning studies. KCPL-GMO~~ KCPL-GMO satisfies the economic planning principle by utilizing the SPP regional economic planning process. studies principle through its direct and active participation in the SPP coordinated planning process. Economics is a consideration that SPP includes in its transmission planning studies. 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 lower ratesenergy 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 OATTpen Access Transmission Tariff (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.

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~~For in-house studies that are for local transmission issues such as load growth or addition of a specific large load, KCPL-GMO planning engineers always consider economic impacts of the various alternatives and use engineering economics to determine the least-cost alternative when considering capital costs as well as annual expenses such as O&M, KW losses and KVAR losses for each alternative.~~

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~~ Open Access Transmission Tariff (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.

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

Costs incurred by KCPL-GMO while completing ~~does~~ a planning study 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. ~~resulting from a customer request, the customer is provided with an estimate of the cost. When the study is complete the customer is billed for the actual cost of doing the study. A description of this procedure can be found in the KCPL-GMO OATT. 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.~~

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Attachment 3

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 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. 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.

KCPL-GMO will post the results of planning studies completed for such projects on KCPL-GMO’s OASIS so that all stakeholders have an opportunity to review the studies. 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. Stakeholders seeking the FERC Form

715 and any other information labeled “Critical Energy Infrastructure Information” (“CEII”) may request access to the information 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.

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).

All customers with loads on the GMO system and taking transmission under the SPP OATT are requested by GMO to provide updates to planning model data according to GMO and SPP specifications. GMO will notify customers of the specific data required within two weeks of when SPP notifies GMO of the requirements. The data shall be incorporated into the SPP model development process for use by GMO and SPP in planning processes. GMO has posted on its OASIS its “*Bulk Electric System Planning Criteria*” document. It includes information regarding GMO’s specific study requirements.

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 to any needs indentified by KCPL-GMO in its transmission planning process and may submit a request to the KCPL-GMO manager of transmission planning for a meeting to discuss proposed alternative transmission solutions. 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.

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 policy are not directly assigned. Labor costs are accounted through standard FERC account codes.

Costs incurred by KCPL-GMO while completing a planning study 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. 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.

Attachment 4

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 Authority 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 (SPP) 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

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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 Open Access Transmission Tariff (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~~Open Access Transmission Tariff (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.

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 ~~Expansion Plan~~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.

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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 Group (RTG) 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~~Open Access Transmission Tariff (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.

KCPL-GMO will post the results of planning studies completed for such projects on KCPL-GMO's OASIS so that all stakeholders have an opportunity to review the studies. 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 expansion planning process~~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~~~~pen Access Transmission Tariff~~ (as revised in compliance with Order 890).

~~For local planning issues as described in Section 3.1 above, KCPL-GMO applies all of these same SPP criteria, methodology, and processes for conducting local planning studies. KCPL-GMO uses the SPP load flow models for all in-house studies.~~ 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. Stakeholders seeking the FERC Form 715 and any other information labeled “Critical Energy Infrastructure Information” (“CEII”) may request access to the information 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.

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~~~~Open Access Transmission Tariff~~ (as revised in compliance with Order 890).

All customers with loads on the GMO system and taking transmission under the SPP OATT are requested by GMO to provide updates to planning model data according to GMO and SPP specifications. GMO will notify customers of the specific data required within two weeks of when SPP notifies GMO of the requirements. The data shall be incorporated into the SPP model development process for use by GMO and SPP in planning processes. GMO has posted on its OASIS its "Bulk Electric System Planning Criteria" document. It includes information regarding GMO's specific study requirements.

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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 ~~Expansion Planning Process~~ 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. ~~Rules and~~ KCPL-GMO adheres to procedures regarding comparability issues ~~are all~~ set out in detail in Attachment O to the SPP ~~Open Access Transmission Tariff~~ 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 Aggregate Transmission Service 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 transmision 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 solutions to any needs indentified by KCPL-GMO in its transmission planning process and may submit a request to the KCPL-GMO manager of transmission planning for a meeting to discuss proposed alternative solutions. Solutions will be evaluated against each other based on a comparison of their relative economics and effectiveness of performance. Standards to compare potential resources will be determined by KCPL-GMO and discussed directly with specific stakeholders.

3.6 Dispute Resolution

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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. satisfies the dispute resolution principle through its direct and active participation in the SPP coordinated planning process. SPP has a dispute resolution process defined in Section 12 of its Tariff. Also, Additionally, KCPL-GMO has a dispute resolution process that is defined in Section 12 of its Tariff as appropriate. Disputes arising under the Transmission Planning Process in this Attachment L shall be subject to the Dispute Resolution Procedures in Section 12 of the 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. dispute resolution process would be used if a local planning dispute were to arise prior to submission of the local plan to the SPP.

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 ~~pen Access Transmission Tariff~~ (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. studies principle through its direct and active participation in the SPP coordinated planning process. Economics is a consideration that SPP includes in its transmission planning studies. 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 lower rates 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 ~~pen Access Transmission Tariff~~ (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.

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~~For in-house studies that are for local transmission issues such as load growth or addition of a specific large load, KCPL-GMO planning engineers always consider economic impacts of the various alternatives and use engineering economics to determine the least-cost alternative when considering capital costs as well as annual expenses such as O&M, KW losses and KVAR losses for each alternative.~~

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~~Open Access Transmission Tariff (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

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Costs incurred by KCPL-GMO while completing ~~does~~ a planning study 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. ~~resulting from a customer request, the customer is provided with an estimate of the cost. When the study is complete the customer is billed for the actual cost of doing the study. A description of this procedure can be found in the KCPL GMO OATT. 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.~~

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