



This document describes the procedures of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company, both subsidiaries of Great Plains Energy, to implement the Federal Energy Regulatory Commission’s Standards of Conduct regulations pursuant to Order No. 717 issued October 16, 2008 and effective November 26, 2008.

Regulatory Text	The Company’s Policy or Procedures
<p>PART 358—STANDARDS OF CONDUCT Sec.</p> <p>§ 358.1 <u>Applicability.</u> § 358.2 <u>General principles.</u> § 358.3 <u>Definitions.</u> § 358.4 <u>Non-discrimination requirements.</u> § 358.5 <u>Independent functioning rule.</u> § 358.6 <u>No conduit rule.</u> § 358.7 <u>Transparency rule.</u> § 358.8 <u>Implementation requirements.</u></p> <p>Authority: 15 U.S.C. 717–717w, 3301–3432; 16 U.S.C. 791–825r, 2601–2645; 31 U.S.C. 9701; 42 U.S.C. 7101–7352.</p>	<p>Overview It is the policy of Great Plains Energy Incorporated and its subsidiaries, Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company, (the “Company”) to fully comply with the Standards of Conduct (the “Standards”) established by Order 717 issued by the Federal Energy Regulatory Commission (“FERC”) and effective November 26, 2008, as it may be supplemented or amended. These are the written procedures followed by the Company to comply with the Standards.</p> <p>There are four major principles of the Standards: 1) a nondiscrimination principle, 2) an independent functioning principle, 3) the no conduit rule principle, and 4) an equal access to information principle.</p> <p>The nondiscrimination principle requires that a Transmission Provider must treat all transmission customers, affiliated and non-affiliated, on a nondiscriminatory basis and that it may not operate its transmission system to preferentially benefit an affiliate. The independent functioning principle requires a Transmission Provider to ensure that no internal overlap of employees exists between Transmission Function employees and employees engaged in Marketing functions. The No-Conduit rule requires that non-public transmission information cannot be disclosed, by any means, to a Transmission Provider’s Marketing Function employees. The equal access to information principle requires that information about the Transmission Provider’s transmission system is provided to its customers (affiliated and nonaffiliated) at the same time. Marketing Function employees must not be provided any preference to transmission system information over non-affiliated customers.</p> <p>The Standards and the Company procedures implementing the Standards are set out below. The procedures are designed to carry out the policy of the Company and to comply with the Standards.</p>

<p>§ 358.1 Applicability.</p> <p>(a) This part applies to any interstate natural gas pipeline that transports gas for others pursuant to subparts B or G of part 284 of this chapter and conducts transmission transactions with an affiliate that engages in marketing functions.</p> <p>(b) This part applies to any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce and conducts transmission transactions with an affiliate that engages in marketing functions.</p> <p>(c) This part does not apply to a public utility transmission provider that is a Commission-approved Independent System Operator (ISO) or Regional Transmission Organization (RTO). If a public utility transmission owner participates in a Commission-approved ISO or RTO and does not operate or control its transmission system and has no access to transmission function information, it may request a waiver from this part.</p> <p>(d) A transmission provider may file a request for a waiver from all or some of the requirements of this part for good cause.</p>	<p>The Standards of Conduct are applicable to the Company as Kansas City Power and Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("KCP&L-GMO") are public utilities that own, operate or control facilities used for the transmission of electric energy in interstate commerce and conduct transmission transactions with an affiliate that engages in marketing functions.</p> <p>It is the responsibility of all directors, officers and employees of the Company to comply with the provisions of the Standards and the Company's policy and procedures, both in spirit and to the letter.</p> <p>No policy or procedure can cover every situation that might occur. Direct questions and concerns about interpretation or application of the policy or procedures to David Douglass, Regulatory Compliance Manager, david.douglass@kcpl.com, 816-654-1584, Jennifer Flandermeyer, Sr. Manager-Operations Compliance Programs, jennifer.flandermeyer@kcpl.com, 816-654-1308, or Ellen Fairchild, the Company's Chief Compliance Officer.</p> <p>Questions about the Standards, or for the confidential and anonymous reporting of concerns or complaints, also can be addressed via the Company's ConcernsLine, 1-866-266-7595, toll-free, 24 hours a day, everyday, , or e-mail FERCCompliance@kcpl.com.</p>
<p>§ 358.2 General principles.</p> <p>(a) A transmission provider must treat all transmission customers, affiliated and non-affiliated, on a not unduly discriminatory basis, and must not make or grant any undue preference or advantage to any person or subject any person to any undue prejudice or disadvantage with respect to any transportation of natural gas or transmission of electric energy in interstate commerce, or with respect to the wholesale sale of natural gas or of electric energy in interstate commerce.</p> <p>(b) A transmission provider's transmission function employees must function independently from its marketing function employees, except as permitted in this part or otherwise permitted by Commission order.</p> <p>(c) A transmission provider and its employees, contractors, consultants and agents are prohibited from disclosing, or using a conduit to disclose, non-public transmission function information to the transmission provider's marketing function employees.</p> <p>(d) A transmission provider must provide equal access to non-public transmission function information to all its transmission function customers, affiliated and non-affiliated, except in the case of confidential customer information or Critical Energy Infrastructure Information.</p>	<p>The Company treats all transmission customers, affiliated and non-affiliated, on a not unduly discriminatory basis and does not operate its transmission systems to preferentially benefit, nor disadvantage, its affiliated transmission customer.</p> <p>The Company has structured its organization so that Transmission Function employees engaged in day-to-day operations of the transmission system function independently from the Company's Marketing Function employees. These employees are separated by the Company's internal management reporting relationships and also are physically separated by being located in two different office buildings.</p> <p>The Company's employees are made aware of and trained on the No Conduit rule. The Company's Transmission Function employees and Marketing Function employees are identified and classified based on their job functions. Those employees classified as Transmission Function employees, as well as employees not performing these functions, are trained to identify non-public transmission function information and to not share this non-public transmission function information with the Company's Marketing Function employees.</p> <p>The Company's transmission providers maintain OASIS sites and participate in regional tariff administration as provided by the Southwest Power Pool ("SPP") Regional Transmission Organization. Information is posted to the OASIS site or to the Company's Internet site as required in operating the transmission system.</p>
<p>§ 358.3 Definitions.</p> <p>(a) <u>Affiliate</u> of a specified entity means:</p> <p>(1) Another person that controls, is controlled by or is under common control with, the specified entity. An affiliate includes a division of the specified entity that operates as a functional unit.</p> <p>(2) For any exempt wholesale generator (as defined under § 366.1 of this chapter), affiliate shall have the meaning set forth in § 366.1 of this chapter, or any successor provision.</p>	<p>The Company has conducted a review of the defined terms in the Standards to ensure that the terms are properly incorporated into this policy and procedures document. Questions regarding the definitions should be directed to the Company's Standards of Conduct Chief Compliance Officer or designate. Specific definitions as applicable to the Company are outlined below.</p> <p>"Company" means Great Plains Energy and its subsidiaries, KCP&L and KCP&L-GMO. Both KCP&L and KCP&L-GMO are public utilities.</p>

(3) "Control" as used in this definition means the direct or indirect authority, whether acting alone or in conjunction with others, to direct or cause to direct the management policies of an entity. A voting interest of 10 percent or more creates a rebuttable presumption of control.

(b) Internet website refers to the Internet location where an interstate natural gas pipeline or a public utility posts the information, by electronic means, required under this part 358.

(c) Marketing functions means:

(1) in the case of public utilities and their affiliates, the sale for resale in interstate commerce, or the submission of offers to sell in interstate commerce, of electric energy or capacity, demand response, virtual transactions, or financial or physical transmission rights, all as subject to an exclusion for bundled retail sales, including sales of electric energy made by providers of last resort (POLRs) acting in their POLR capacity; and

(2) in the case of interstate pipelines and their affiliates, the sale for resale in interstate commerce, or the submission of offers to sell in interstate commerce, natural gas, subject to the following exclusions:

(i) Bundled retail sales,

(ii) Incidental purchases or sales of natural gas to operate interstate natural gas pipeline transmission facilities,

(iii) Sales of natural gas solely from a seller's own production,

(iv) Sales of natural gas solely from a seller's own gathering or processing facilities, and

v) Sales by an intrastate natural gas pipeline, by a Hinshaw interstate pipeline exempt from the Natural Gas Act, or by a local distribution company making an on-system sale.

(d) Marketing function employee means an employee, contractor, consultant or agent of a transmission provider or of an affiliate of a transmission provider who actively and personally engages on a day-to-day basis in marketing functions.

(e) Open Access Same Time Information System or OASIS refers to the Internet location where a public utility posts the information required by part 37 of this chapter, and where it may also post the information required to be posted on its Internet website by this part 358.

(f) Transmission means electric transmission, network or point-to-point service, ancillary services or other methods of electric transmission, or the interconnection with jurisdictional transmission facilities, under part 35 of this chapter; and natural gas transportation, storage, exchange, backhaul, or displacement service provided pursuant to subparts B or G of part 284 of this chapter.

(g) Transmission customer means any eligible customer, shipper or designated agent that can or does execute a transmission service agreement or can or does receive transmission service, including all

"Employee" means an employee, contractor, consultant or agent.

KCP&L and KCP&L-GMO are "Affiliates" of each other because they are under the common control of Great Plains Energy. Specific employees in the Company's Power Supply & Services group perform marketing functions on behalf of KCP&L and KCP&L-GMO.

"Internet website" refers to www.kcpl.com. The direct link to the Company's Standards of Conduct postings is <http://www.kcpl.com/about/FERCCCompliance.html>.

As a public utility, "Marketing functions" mean the sale for resale in interstate commerce, or the submission of offers to sell in interstate commerce, of electric energy or capacity, demand response, virtual transactions, or financial or physical transmission rights, all as subject to an exclusion for bundled retail sales, including sales of electric energy made by providers of last resort (POLRs) acting in their POLR capacity

The Company reviewed functions performed by employees and identified a specific group of employees as "Marketing Function employees" as defined by the Standards. These employees are in the Power Sales and Services group and also includes the Sr. Manager of Supply Resources in the Product Administration group. When applicable, it also includes any contractors, consultants or agents of the Company who actively and personally engages on a day-to-day basis in marketing functions. These employees noted above are the specific employees performing the marketing functions as defined by the Standards for a public utility on behalf of KCP&L and KCP&L-GMO. A list of Marketing Function employees is provided to the Company's Transmission Function employees and is available electronically on the Intranet. It also can be obtained by contacting David Douglass, Regulatory Compliance Manager, at david.douglass@kcpl.com.

The Southwest Power Pool's "OASIS" site can be accessed at http://www.oatiaoasis.com/spp_default.html. The Company's "OASIS" sites are located via links from that site.

"Transmission" means electric transmission, network or point-to-point service, ancillary services or other methods of electric transmission, or the interconnection with jurisdictional transmission facilities, under part 35 of this chapter; and natural gas transportation, storage, exchange, backhaul, or displacement service provided pursuant to subparts B or G of part 284 of this chapter.

"Transmission customer" means any eligible customer, shipper or designated agent that can or does execute a transmission service agreement with KCP&L or KCP&L-GMO or can or does receive transmission service, including all persons who have pending requests for transmission service or for information regarding transmission.

<p>persons who have pending requests for transmission service or for information regarding transmission.</p> <p>(h) <u>Transmission functions</u> means the planning, directing, organizing or carrying out of day-to-day transmission operations, including the granting and denying of transmission service requests.</p> <p>(i) <u>Transmission function employee</u> means an employee, contractor, consultant or agent of a transmission provider who actively and personally engages on a day-to-day basis in transmission functions.</p> <p>(j) <u>Transmission function information</u> means information relating to transmission functions.</p> <p>(k) <u>Transmission provider</u> means:</p> <p>(1) Any public utility that owns, operates or controls facilities used for the transmission of electric energy in interstate commerce; or</p> <p>(2) Any interstate natural gas pipeline that transports gas for others pursuant to subparts B or G of part 284 of this chapter.</p> <p>(3) A transmission provider does not include a natural gas storage provider authorized to charge market-based rates.</p> <p>(l) <u>Transmission service</u> means the provision of any transmission as defined in § 358.3(f).</p> <p>(m) <u>Waiver</u> means the determination by a transmission provider, if authorized by its tariff, to waive any provisions of its tariff for a given entity.</p>	<p>“Transmission functions” means the planning, directing, organizing or carrying out of day-to-day transmission operations, including the granting and denying of transmission service requests.</p> <p>The Company reviewed functions performed by employees and identified two specific groups of employees as “Transmission function employees” as defined by the Standards. These employees are (1) transmission system operators in the Transmission Operations group, and (2) engineers in the Transmission Planning group. When applicable, it also includes any contractors, consultants or agents of the Company who actively and personally engages on a day-to-day basis in transmission functions. These employees noted in this paragraph are the specific employees performing the transmission functions as defined by the Standards on behalf of KCP&L and KCP&L-GMO. A list of Transmission Function employees is provided to the Company’s Marketing Function employees and is available electronically on the Intranet. It also can be obtained by contacting David Douglass, Regulatory Compliance Manager, at david.douglass@kcpl.com.</p> <p>“Transmission function information” means information relating to transmission functions. It includes inquiries about potential transmission services, facilities or expansion; requests for new or expanded transmission services; transmission flows; transmission equipment status; transmission system modeling; available transfer capability; transmission service pricing; transmission maintenance activity; scheduled transmission outages; curtailment of transmission service; ancillary services; pricing; storage; and balancing. Transmission customer information is a subset of transmission information, namely information that is submitted in connection with a request for transmission service.</p> <p>KCP&L and KCP&L-GMO are “Transmission Providers.” They are public utilities that own, operate or control facilities used for the transmission of electric energy in interstate commerce.</p> <p>“Transmission service” means the provision of any transmission as defined in “Transmission” earlier in this section.</p> <p>“Waiver” means the determination by a transmission provider, if authorized by its tariff, to waive any provisions of its tariff for a given entity.</p>
<p>§ 358.4 Non-discrimination requirements.</p> <p>(a) A transmission provider must strictly enforce all tariff provisions relating to the sale or purchase of open access transmission service, if the tariff provisions do not permit the use of discretion.</p> <p>(b) A transmission provider must apply all tariff provisions relating to the sale or purchase of open access transmission service in a fair and impartial manner that treats all transmission customers in a not unduly discriminatory manner, if the tariff provisions permit the use of discretion.</p> <p>(c) A transmission provider may not, through its tariffs or otherwise, give undue preference to any person in matters relating to the sale or purchase of transmission service (including, but not limited to, issues of price, curtailments, scheduling, priority, ancillary services, or balancing).</p> <p>(d) A transmission provider must process all similar requests for transmission in the same manner and within the same period of time.</p>	<p>The Company’s Transmission Providers treat all transmission customers, affiliated or non-affiliated, on a non-discriminatory basis, and does not operate its transmission systems to preferentially benefit, nor disadvantage, its affiliated transmission customer. The Company strictly complies with the Southwest Power Pool Open Access Transmission Tariff and enforces all applicable provisions under its Open Access Transmission Tariffs on a non-discriminatory basis to all eligible customers without preference to any particular customer, affiliated or non-affiliated.</p> <p>If one of the Company’s Transmission Providers offers a rate discount on ancillary services to its affiliated transmission customer, or attributes a discounted ancillary service rate to its own transactions, the Company shall, at the same time, post on the OASIS an offer to provide the same discount to all eligible customers.</p> <p>The Company does not favor the interests of its affiliated transmission customer over any other transmission customer. The Company’s Marketing Function employees rely on OASIS sites to obtain information concerning the Company’s transmission systems. Requests to obtain information can only be processed through OASIS sites.</p>

<p>§ 358.5 Independent functioning rule.</p> <p>(a) <u>General rule.</u> Except as permitted in this part or otherwise permitted by Commission order, a transmission provider's transmission function employees must function independently of its marketing function employees.</p> <p>(b) <u>Separation of functions.</u></p> <p>(1) A transmission provider is prohibited from permitting its marketing function employees to:</p> <p>(i) Conduct transmission functions; or</p> <p>(ii) Have access to the system control center or similar facilities used for transmission operations that differs in any way from the access available to other transmission customers.</p> <p>(2) A transmission provider is prohibited from permitting its transmission function employees to conduct marketing functions.</p>	<p>Except in emergency circumstances affecting transmission system reliability, the company's Transmission Function employees function independently from the Company's Marketing Function employees. Reporting relationships in respect of these different business groups or departments are separated to the senior officer level to further maintain an appropriate separation of functions.</p> <p>The Company physically separates Transmission Function employees from Marketing Function employees by providing office facilities that reduce contact.</p> <p>Access to the Company's primary and backup transmission operations control centers are controlled by electronic access card. The facilities access cards issued to Marketing Function employees are programmed such as to prohibit access to the transmission operations control centers. All office areas occupied by the Company's Transmission Function employees are secured to prevent unauthorized access by the Company's Marketing Function employees. Issuance of access authority to the Company's primary and backup transmission operations control centers is controlled by James Useldinger, Manager Transmission System Operations, or designee.</p> <p>In the event that the Company's Marketing Function employees seek to enter the office areas occupied by the Transmission Function employees or to enter the transmission operations control centers, prior approval must be obtained from the Standards of Conduct Chief Compliance Officer, the Regulatory Compliance Manager or the Manager Transmission System Operations. Such approval will not be given if the access sought is not available to other transmission customers. Transmission Function employees must record the access by documenting the visit in a log maintained by the Manager Transmission System Operations. A Marketing Function employee allowed access must be escorted at all times.</p> <p>The Company's Transmission Function employees do not engage in the sale for resale in interstate commerce, or the submission of offers to sell in interstate commerce, of electric energy or capacity, demand response, virtual transaction, or financial or physical transmission rights.</p> <p>The Company's Marketing Function employees do not engage in the planning, directing, organizing or carrying out of the Company's day-to-day transmission operations, including the granting and denying of transmission service requests. Marketing Function employees do not operate or control facilities used for the transmission of electricity in interstate commerce.</p> <p>The Company's Energy Management System ("EMS") runs on a computer network that is separated from other company networks by a firewall. Unique user logins are maintained for access to the EMS. User logins are issued only upon authorization of the Manager, Real Time Systems, or designee. Each user login is assigned specific access rights to various portions of the EMS. Only Transmission Function employees are assigned access rights to the transmission system-related portions of the EMS. The Manager, Real Time Systems, or designee, is notified immediately when a Transmission Function employee ceases being a Transmission Function employee and as a result terminates the employee's access to transmission function information on the EMS.</p> <p>Other Company employees may be authorized to have access rights to non-transmission system-related portions of the EMS as job functions require. Such employees do not have access and are instructed to not attempt to access</p>
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	<p>any transmission system-related portions of the EMS. Marketing Function employees generally have access to EMS information to provide for economic operation of generating resources, Automatic Generation Control information to provide for load regulation to meet the Company's customer load demand, monitoring generating unit conditions, and the tracking of marketing energy transactions.</p> <p>In addition to EMS logins, access to the EMS is controlled by a combination of hardware and software resident on PCs or other EMS terminals.</p> <p>Access to the Company's corporate computer networks (other than the EMS network) is controlled by the Company's Information Technology group, pursuant to corporate policies and procedures. Access to non-EMS transmission information system applications or transmission information stored on servers, will not be granted without the authorization of the manager, supervisor or subject matter expert of the internal Company Business Unit that owns the data/information. IT is notified immediately of any changes of the identified Transmission Function employees or Marketing Function employees. IT removes the employee's access to non-EMS transmission system applications and transmission information on non-EMS networks.</p>
<p>§ 358.6 No conduit rule. (a) A transmission provider is prohibited from using anyone as a conduit for the disclosure of non-public transmission function information to its marketing function employees. (b) An employee, contractor, consultant or agent of a transmission provider, and an employee, contractor, consultant or agent of an affiliate of a transmission provider that is engaged in marketing functions, is prohibited from disclosing non-public transmission function information to any of the transmission provider's marketing function employees.</p>	<p>The Standards prohibit a Transmission Provider and its employees from disclosing any of its Transmission Function information to an employee who performs marketing functions—or using someone else as a conduit to do so.</p> <p>The "No Conduit Rule" prohibits employees from acting as an improper conduit of transmission function information from the Transmission Provider to the Company's Marketing Function employees. All of the Company's employees, inclusive of any contractors, consultants or agents of the Company, (not just the identified Transmission Function employees) are not allowed to disclose any non-public transmission function information (including transmission customer information) to any of the Company's Marketing Function employees or use anyone to funnel such information to those marketing function employees.</p> <p>Through training courses, meeting reminders and other internal communications, the Regulatory Compliance Manager educates the Company's employees on the No Conduit Rule and reminds employees that they are prevented to act as a conduit between the Company's Transmission Function Employees and Marketing Function employees.</p>
<p>§ 358.7 Transparency rule. (a) <u>Contemporaneous disclosure.</u> (1) If a transmission provider discloses non-public transmission function information, other than information identified in paragraph (a)(2) of this section, in a manner contrary to the requirements of § 358.6, the transmission provider must immediately post the information that was disclosed on its Internet website. (2) If a transmission provider discloses, in a manner contrary to the requirements of § 358.6, non-public transmission customer information, critical energy infrastructure information (CEII) as defined in § 388.113(c)(1) of this chapter or any successor provision, or any other information that the Commission by law has determined is to be subject to limited dissemination, the transmission provider must immediately post notice on its website that the information was disclosed.</p>	<p><u>Contemporaneous disclosure:</u> If the Company's Transmission Function employees, or any other non-Marketing Function employee, disclose the Transmission Provider's non-public transmission function information, the employee must immediately notify their supervisor and David Douglass, Regulatory Compliance Manager. The Regulatory Compliance Manager will immediately ensure the posting of such information on the OASIS and will notify the Standards of Conduct Chief Compliance Officer. This excludes information identified in paragraph (a)(2) of this section or information that relates solely to a specific request for transmission service by the affiliated transmission customer.</p> <p>The supervisor of the employee disclosing such information will prepare a written report documenting the nature of the disclosure and will provide the report to the Standards of Conduct Chief Compliance Officer and Regulatory Compliance Manager.</p> <p>The Standards of Conduct Chief Compliance Officer and the Regulatory Compliance Manager shall conduct, or cause the conduct of, an investigation regarding the disclosure and will make all necessary recommendations to the Company's senior management of appropriate actions in response to the disclosure, including disciplinary action up</p>

<p>(b) <u>Exclusion for specific transaction information.</u> A transmission provider's transmission function employee may discuss with its marketing function employee a specific request for transmission service submitted by the marketing function employee. The transmission provider is not required to contemporaneously disclose information otherwise covered by § 358.6 if the information relates solely to a marketing function employee's specific request for transmission service.</p> <p>(c) <u>Voluntary consent provision.</u> A transmission customer may voluntarily consent, in writing, to allow the transmission provider to disclose the transmission customer's non-public information to the transmission provider's marketing function employees. If the transmission customer authorizes the transmission provider to disclose its information to marketing function employees, the transmission provider must post notice on its Internet website of that consent along with a statement that it did not provide any preferences, either operational or rate-related, in exchange for that voluntary consent.</p> <p>(d) <u>Posting written procedures on the public Internet.</u> A transmission provider must post on its Internet website current written procedures implementing the standards of conduct.</p> <p>(e) <u>Identification of affiliate information on the public Internet.</u> (1) A transmission provider must post on its Internet website the names and addresses of all its affiliates that employ or retain marketing function employees.</p>	<p>to and including termination. Meetings involving both Transmission Function employees and Marketing Function employees will be kept to a minimum. At any meeting involving both, Marketing Function employees will be required to leave the meeting before any non-public transmission information is discussed. Notes regarding any such meeting, including who was in attendance and the topics of discussion, will be taken and provided to the Regulatory Compliance Manager promptly upon completion of the meeting. It is the obligation of both groups of employees, and any other Company employees attending the meeting, to comply with this procedure.</p> <p><u>Exclusion for specific transaction information:</u> The Company's Transmission Function employees may discuss with its Marketing Function employees information regarding a specific request for transmission service submitted by a Company Marketing Function employee. Disclosure of this information is not required if the information relates solely to a Marketing Function employee's specific request for transmission service.</p> <p><u>Voluntary consent provision:</u> A transmission customer can submit a written statement to allow the Transmission Provider to disclose the transmission customer's non-public transmission information with the Company's Marketing Function employees.</p> <p>A request for consent must be submitted by the transmission customer to the Company's Regulatory Compliance Manager, who in turn will coordinate access to the information with the Company's Marketing Function employees. The request must specifically describe the information to be shared, the purpose for which the shared information will be used, and the effective period for such consent. No preferences, either operational or rate-related, can be offered in exchange for that voluntary consent. Further, a transmission customer who declines consent to the sharing of information will continue being offered or provided transmission service in a fair, impartial and non-discriminatory manner.</p> <p>The Regulatory Compliance Manager will post on the Company's Internet site with a link from its OASIS site when a transmission customer authorizes the Transmission Provider to disclose its information to the Company's Marketing Function employees. Any such posting will include the statement that no preferences, either operational or rate-related, can be offered in exchange for that voluntary consent.</p> <p><u>Posting written procedures on the public Internet:</u> The Company posts on its Internet site, with a link from its OASIS sites, its written policy and procedures for the Standards of Conduct. The procedures also are distributed internally to employees via a link on the Intranet site, a link in the training module, and periodic internal communications. During new employee orientation sessions, employees are advised of the existence of company policies on the Intranet. Company contractors are provided the Internet address of this policy and procedures document. Compliance by contractors is a specific condition of all contracts entered into after the effective date of this policy and procedures.</p> <p><u>Identification of affiliate information on the public Internet:</u> KCP&L and KCP&L-GMO are Transmission Providers and are affiliates because they are under the common control of Great Plains Energy. The Company's Transmission Function and the Company's Wholesale Merchant Function are "functional units" within the Company. The Company does not have any market-regulated power marketing affiliates. The Marketing Function employees performing marketing functions on behalf of KCP&L and KCP&L-GMO are in the Power Sales and Services group and also includes the Sr. Manager of Supply Resources in the Product Administration group. When applicable, it</p>
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(2) A transmission provider must post on its Internet website a complete list of the employee-staffed facilities shared by any of the transmission provider's transmission function employees and marketing function employees. The list must include the types of facilities shared and the addresses of the facilities.

(3) The transmission provider must post information concerning potential merger partners as affiliates that may employ or retain marketing function employees, within seven days after the potential merger is announced.

(f) Identification of employee information on the public Internet.

(1) A transmission provider must post on its Internet website the job titles and job descriptions of its transmission function employees.

(2) A transmission provider must post a notice on its Internet website of any transfer of a transmission function employee to a position as a marketing function employee, or any transfer of a marketing function employee to a position as a transmission function employee. The information posted under this section must remain on its Internet website for 90 days. No such job transfer may be used as a means to circumvent any provision of this part. The information to be posted must include:

- (i) The name of the transferring employee,
- (ii) The respective titles held while performing each function (i.e., as a transmission function employee and as a marketing function employee), and
- (iii) The effective date of the transfer.

(g) Timing and general requirements of postings on the public Internet.

(1) A transmission provider must update on its Internet website the information required by this part 358 within seven business days of any change, and post the date on which the information was updated. A public utility may also post the information required to be posted under part 358 on its OASIS, but is not required to do so.

(2) In the event an emergency, such as an earthquake, flood, fire or hurricane, severely disrupts a transmission provider's normal business operations, the posting requirements in this part may be suspended by the transmission provider. If the disruption lasts longer than one month, the

also includes any contractors, consultants or agents of the Company who actively and personally engage on a day-to-day basis in marketing functions. This group reports to the Company's Senior Vice President-Supply. The employees are located at 1200 Main, 29th Floor, Kansas City, Missouri, 64106. This information is posted on the Company's Internet site with a link from its OASIS sites.

Transmission Function employees of the Company's Transmission Providers do not regularly share for any day-to-day functions any employee-staffed facilities with any of the Company's Marketing Function employees. This information is posted on the Company's Internet site with a link from its OASIS sites.

After the public announcement of any potential merger partner(s) as affiliates that may employ or retain Marketing Function employees, the Company's Corporate Secretary's Office shall provide to the Regulatory Compliance Manager information about the potential merger partner(s) for posting on the Company's Internet site with a link from its OASIS sites. The Regulatory Compliance Manager works with the Corporate Communications department to have information posted on the Internet site, with a link from its OASIS sites, within seven days of the public announcement.

Identification of employee information on the public Internet: The Company posts on its Internet site, with a link from its OASIS sites, the job titles and job descriptions of its Transmission Function employees. The Company's practice also is to post the job titles and job descriptions of its Marketing Function employees. The Regulatory Compliance Manager has been assigned the responsibility of maintaining the accuracy of this information including information about any employee transfers. This information and all other postings pursuant to the Standards can be accessed at <http://www.kcpl.com/about/FERCCCompliance.html>.

A notice will be posted to the Company's Internet site, with a link from its OASIS sites, any transfer of a transmission function employee to a position as a marketing function employee, or any transfer of a marketing function employee to a position as a transmission function employee. In an effort to provide greater transparency, it is the Company's practice to include any transfer of an employee into or out of a transmission function role, or into or out of a marketing function role regardless of the employee's original or destination role. The transfer notice will be posted within seven days of the effective date of the transfer. The information posted will include the employee's name, respective titles, and effective date of transfer. It will remain posted for a minimum of 90 days. The Regulatory Compliance Manager is responsible for gathering and maintaining this information, with assistance from the Company's Human Resources group. The Regulatory Compliance Manager works with the Corporate Communications department to have information posted on the Internet site, with a link from its OASIS sites, within seven days of the public announcement.

Timing and general requirements of postings on the public Internet: Information required by this part of 358 will be posted on the Company's Internet site with a link from its OASIS sites within seven days. A link to the information on the Company's Internet site will be prominent and readily accessible.

In the event an emergency, such as an earthquake, flood, fire or hurricane, severely disrupts the Company's normal business operations, the posting requirements in this part may be suspended. If the disruption lasts longer than one month, the Company will notify FERC and can seek an extension for further exemption from the posting requirements.

<p>transmission provider must so notify the Commission and may seek a further exemption from the posting requirements.</p> <p>(3) All Internet website postings required by this part must be sufficiently prominent as to be readily accessible.</p> <p>(h) <u>Exclusion for and recordation of certain information exchanges.</u></p> <p>(1) Notwithstanding the requirements of §§ 358.5(a) and 358.6, a transmission provider's transmission function employees and marketing function employees may exchange certain non-public transmission function information, as delineated in § 358.7(h)(2), in which case the transmission provider must make and retain a contemporaneous record of all such exchanges except in emergency circumstances, in which case a record must be made of the exchange as soon as practicable after the fact. The transmission provider shall make the record available to the Commission upon request. The record may consist of hand-written or typed notes, electronic records such as e-mails and text messages, recorded telephone exchanges, and the like, and must be retained for a period of five years.</p> <p>(2) The non-public information subject to the exclusion in § 358.7(h)(1) is as follows:</p> <p>(i) Information pertaining to compliance with Reliability Standards approved by the Commission, and</p> <p>(ii) Information necessary to maintain or restore operation of the transmission system or generating units, or that may affect the dispatch of generating units.</p> <p>(i) <u>Posting of waivers.</u> A transmission provider must post on its Internet website notice of each waiver of a tariff provision that it grants in favor of an affiliate, unless such waiver has been approved by the Commission. The posting must be made within one business day of the act of a waiver. The transmission provider must also maintain a log of the acts of waiver, and must make it available to the Commission upon request. The records must be kept for a period of five years from the date of each act of waiver.</p>	<p><u>Exclusion for and recordation of certain information exchanges:</u> The Company's power system operators are tasked with handling generation dispatch functions. The Company's real-time traders, interchange marketers and other designated job titles within the Power Sales & Services group handle all marketing functions. Because of workplace proximity and interaction, all of these employees have been indentified by the Company as Marketing Function employees.</p> <p>Phone conversations of the Company's transmission system operators (Transmission Function employees) are recorded electronically. Phone conversations of the Company's power system operators (Marketing Function employees) are recorded electronically.</p> <p>The Company's Transmission Function employees and/or the Marketing Function employees are required to notify the Regulatory Compliance Manager or Manager Transmission System Operations and are required to provide information about phone calls, discussions or meetings that may occur between the Company's Transmission Function employees and Marketing Function employees pertaining to compliance with Reliability Standards approved by the Commission, or information that is shared in order to maintain or restore operation of the transmission system or generating units, or that may affect the dispatch of generating units.</p> <p>The Regulatory Compliance Manager ensures that a record is made of the exchange and that the related information (such as hand-written or typed notes, e-mails, and text messages) is retained for a period of five years.</p> <p><u>Posting of waivers:</u> The Company's Transmission Providers participate in the SPP regional Open Access Transmission Tariff and for specific circumstances its own Open Access Transmission Tariffs. SPP posts on its OASIS site any waivers or information relating to tariff-related matters.</p> <p>If there is a waiver of a transmission provision granted in favor of an affiliate, KCP&L or KCP&L-GMO will post within one day notice of the waiver on its Internet site with a link to it from its OASIS. It is the responsibility of the Regulatory Compliance Manager to post such notice. A log of any acts of waiver will be maintained by the Regulatory Compliance Manager and available for FERC staff upon request.</p>
<p>§ 358.8 Implementation requirements.</p> <p>(a) <u>Effective date.</u></p> <p>A transmission provider must be in full compliance with the standards of conduct on the date it commences transmission transactions with an affiliate that engages in marketing functions.</p> <p>(b) <u>Compliance measures and written procedures.</u></p> <p>(1) A transmission provider must implement measures to ensure</p>	<p><u>Effective date:</u> The Company believes it is in full compliance with the Standards as of the November 26, 2008 effective date. Failure to fully comply with the Standards and this written policy and procedures by any of the Company's employees may result in disciplinary action up to and including termination of employment, or other remedies, all pursuant to the Company's Code of Ethical Business Conduct.</p> <p><u>Compliance measures and written procedures:</u> Information about the Standards and this written policy and procedures are provided to all of the Company's Transmission Function employees, Marketing Function employees,</p>

that the requirements of §§ 358.5 and 358.6 are observed by its employees and by the employees of its affiliates.

(2) A transmission provider must distribute the written procedures referred to in § 358.7(d) to all its transmission function employees, marketing function employees, officers, directors, supervisory employees, and any other employees likely to become privy to transmission function information.

(c) Training and compliance personnel.

(1) A transmission provider must provide annual training on the standards of conduct to all the employees listed in paragraph (b)(2) of this section. The transmission provider must provide training on the standards of conduct to new employees in the categories listed in paragraph (b)(2) of this section, within the first 30 days of their employment. The transmission provider must require each employee who has taken the training to certify electronically or in writing that s/he has completed the training.

(2) A transmission provider must designate a chief compliance officer who will be responsible for standards of conduct compliance. The transmission provider must post the name of the chief compliance officer and provide his or her contact information on its Internet website.

(d) Books and records. A transmission provider must maintain its books of account and records (as prescribed under parts 101, 125, 201 and 225 of this chapter) separately from those of its affiliates that employ or retain marketing function employees, and these must be available for Commission inspections.

officers, directors, supervisory employees, employees identified as potentially receiving transmission information, and any other employees likely to become privy to transmission function information. Distribution could include, but is not limited to, posting on the Company's Intranet site, sent as an e-mail attachment, or the sharing of hard copies at meetings.

The Regulatory Compliance Manager ensures that any updated or revised versions of these written procedures are distributed to the Company's Transmission Function employees, Marketing Function employees and all other company employees.

The procedures also are available internally, including all revisions, to employees via a link on the Intranet site, a link in the training module, and periodic internal news articles. During new employee orientation sessions, employees are advised of the existence of company policies on the Intranet. Company contractors are provided the Internet address of this policy and procedures document. Compliance by contractors is a specific condition of all contracts entered into after the effective date of this policy and procedures.

Training and compliance personnel: During the third or fourth calendar quarter annually, employees will complete online training and will certify electronically or in writing completion of the training. New employees hired after December 26, 2008 are required to complete the Company's online training within their first 30 days of employment and to certify electronically or in writing completion of the training.

Ellen Fairchild is the Company's Chief Compliance Officer. In this role she serves as the FERC Chief Compliance Officer and the Chief Compliance Officer for the FERC Standards of Conduct. She can be reached at ellen.fairchild@kcpl.com or at 816-556-2083. Questions about the Standards can be directed to Ellen Fairchild, David Douglass, Regulatory Compliance Manager, david.douglass@kcpl.com, 816-654-1584, or Jennifer Flandermeyer, Sr. Manager-Operations Compliance Programs, jennifer.flandermeyer@kcpl.com, 816-654-1308.

Questions about the Standards, or for the confidential and anonymous reporting of concerns or complaints, also can be addressed via the Company's ConcernsLine, 1-866-266-7595, toll-free, 24 hours a day, everyday, , or e-mail FERCCompliance@kcpl.com.

This information is posted on the Company's Internet site, with a link to the information from the OASIS site.

Books and records. The Company maintains its books of account and records as prescribed under Parts 101, 125, 201 and 225 of the FERC regulations. Those records are managed by the Company's Controller and are maintained separately from the Company's affiliates that employ or retain marketing function employees. Those books and records will be made available for inspection by FERC in accordance with legal requirements. FERC should direct inspection requests for the Company Controller and the Standards of Conduct Chief Compliance Officer for response. The Standards of Conduct Chief Compliance Officer and the Regulatory Compliance Manager will coordinate inspection activities between the Company and FERC staff.

Revised October 29, 2010

Revision History	
January 29, 2009	Issued
March 12, 2009	Revised compliance contact information
July 1, 2009	Revised compliance contact information, OASIS links
September 18, 2009	Simple grammatical changes throughout, clarification or title changes in definitions for 358.3, clarification, title and office address changes for 358.7(e)
February 22, 2010	Revised procedure related to 358.7(f) to clarify or to insert additional information regarding the Company's process and practice for posting Transmission Function employee information or Marketing Function employee information on the public internet and about posting any transfers of employees. Revised the last paragraph of the procedure related to 385.5(b), inserting information about the Company's Internal Business Unit owners.
October 29, 2010	Revised affiliate explanation in response to 358.7(e); revised compliance contact information