## BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Complaint Against	)	
Kansas City Power & Light Company by	)	Docket No. 17-KCPE-433-COM
Arthur J. Chartrand.	)	

# RESPONSE OF KANSAS CITY POWER & LIGHT COMPANY TO STAFF'S REPORT AND RECOMMENDATION

Kansas City Power & Light Company ("KCP&L" or "Company"), by and through its counsel, hereby submits its response ("Response") to the Staff for the Kansas Corporation Commission's ("Staff") *Notice of Filing of Staff Report and Recommendation* ("Report and Recommendation") filed in this docket on February 13, 2018. For its response to Staff's Report and Recommendation, KCP&L states as follows:

- 1. KCP&L does not agree that its tariff does not clearly define "point of delivery." However, KCP&L will work with Staff in its next rate case to reach a mutually agreeable revision to the tariff.
- 2. Regarding Staff's request that KCP&L should inspect the safety of the Complainant's damaged service riser, KCP&L submits it visually inspected the Complainant's service riser for obvious deficiencies when restoring power to the Complainant in 2017. At that time, Mr. Chartrand was informed the restoration was temporary and he would need to have the service mast repaired as the service riser is owned by the Complainant. KCP&L cannot take responsibility for the safety of a Customer's facilities. However, in order to attempt to comply with Staff's recommendation, KCP&L will again visually inspect the service riser for any obvious safety concerns, and will again notify Complainant that his service mast must be

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<sup>&</sup>lt;sup>1</sup> "Point of Delivery" is defined in KCP&L's tariff, in the General Rules and Regulations, page 1.07, Section 1.11.

repaired. KCP&L will also attempt to have a City of Lenexa code inspector present to determine if the service riser meets Lenexa building codes.

3. Staff's Report and Recommendation does not support the Complainant's claim

that KCP&L was required to replace his service riser under its tariffs. Therefore, since Staff

determined that there was no tariff violation and KCP&L has no obligation to replace

Complainant's service riser, KCP&L requests that the Complaint be dismissed with prejudice.

WHEREFORE, KCP&L respectfully submits for Commission consideration this

Response to the Report and Recommendation.

Respectfully submitted,

#### s Roger W. Steiner

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ATTORNEYS FOR KANSAS CITY POWER & LIGHT COMPANY

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### **VERIFICATION**

STATE OF MISSOURI	
COUNTY OF JACKSON	) ss. )
Kansas City Power & Light Power & Light to Staff's Rep	ng duly sworn, on oath state that I am Director – Regulatory Affairs of Company, that I have read the foregoing <i>Response of Kansas City port and Recommendation</i> and know the contents thereof, and that the and correct to the best of my knowledge and belief.
	KANSAS CITY POWER & LIGHT COMPANY
	By: Soin of Suchti
	Lois J. Liechti
The foregoing was su	bscribed and sworn to before me this 23 <sup>rd</sup> day of February 2018.
	Notary Public
	Notary Public
My Commission Expires:	ANTHONY R WESTENKIRCHNER Notary Public, Notary Seal State of Missouri Platte County
4/26/202	Commission # 17279952 My Commission Expires April 26, 2021

#### **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and correct copy of the above was electronically served, hand-delivered or mailed, postage prepaid, this  $23^{rd}$  day of February, 2018 to all parties and counsel of record.

|s| Roger W. Steiner

Roger W. Steiner