

**THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

Before Commissioners: Shari Feist Albrecht, Chairman  
Jay Scott Emler  
Dwight D. Keen

In the Matter of the Complaint Against Kansas )  
City Power & Light by Jamie Littich ) Docket No. 16-KCPE-195-COM

**OUT OF TIME JUSTIFICATION**

1. This filing is intentionally brief and focused on KCPL's objection to the out of time response by myself and my spouse as we find justifying the timing of our filing pertinent.
2. As noted by KCPL, KCC staff did provide some advanced notice of the intended filing; however, the drafted language appeared to be incomplete thus full attention could not be granted until an actual filing was provided.
3. The advanced notice by KCC, again referenced by KCPL, came at a time in which I, Joseph Littich, have extensive work obligations that have been scheduled years in advance to accommodate future planned outages. This work has taken weeks of scrutiny and diligence and I am not able to adjust the schedule.
4. In addition to work obligations, personal interferences arose including taking on a flu the week of the filing. That flu took me out of commission for several days and complicated an already compacted schedule.
5. The history of this case has accommodated KCPL staff for personnel being out of office, personnel personal issues and work-related issues. The out of time justification provided in this filing is consistent with what's been granted to KCPL in previous filings.
6. In response to KCPL objecting to my filing: we believe it's beneficial to this docket and to the commissioners to acknowledge the complainant party includes qualifications and to include the truthful nature of my involvement. My response does not in anyway inhibit KCPL from responding to the corrections provided on NESC discussion and the physics of electrical systems, the misapplication of circuit protection, and the inaccurate available fault current calculation.
7. I stand by my word and objective assessment of available facts and data. Everything asked for is more than reasonable and justified. We are again asking the commission to enforce existing rules to address the KCPL circuit

protection issue and investigate other regulatory approved metrics and mechanisms that are believed to be contributing factors in KCC's oversight. Conversely, KCPL is asking the Kansas commissioners to ignore filed information, lower requirements below already minimal standards and forever sanction utility electrical fires caused by the misapplication of circuit protection and lack of maintenance. No other utility to my knowledge has asked for or needs this egregious allowance.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Joe Littich", with a stylized flourish at the end.

Joseph Littich, P.E.\*

\*Licensed in KS, MO.

A handwritten signature in blue ink, appearing to read "Jamie Littich", with a stylized flourish at the end.

Jamie Kathleen Littich