

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

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

NOTICE OF FILING OF STAFF'S SECOND REPORT AND RECOMMENDATION

The Staff of the Kansas Corporation Commission (Staff) hereby submits a Report and Recommendation (R&R) dated March 7, 2017. This R&R is responsive to both Kansas City Power and Light Company's (KCP&L's) response to Staff's first R&R, and the Complainant's responses to both Staff's first R&R and KCP&L's response to Staff's first R&R. Staff continues to support the recommendations contained in its first R&R filed December 15, 2016.

WHEREFORE, Staff submits its R&R dated March 7, 2017, attached hereto, for Commission consideration.

Respectfully Submitted,



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STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

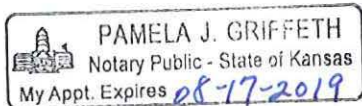
VERIFICATION

Michael Neeley, being duly sworn upon his oath deposes and states that he is Litigation Counsel for the State Corporation Commission of the State of Kansas, that he has read and is familiar with the foregoing *Notice of Filing of Staff's Second Report and Recommendation* and that the statements contained therein are true and correct to the best of his knowledge, information and belief.



Michael Neeley # 25027
Kansas Corporation Commission of the
State of Kansas

Subscribed and sworn to before me this 8th day of March, 2017.


Notary Public

My Appointment Expires: August 17, 2019

**REPORT AND RECOMMENDATION
UTILITIES DIVISION**

TO: Chairman Pat Apple
Commissioner Shari Feist Albrecht
Commissioner Jay Scott Emler

FROM: Leo Haynos, Chief Engineer
Jeff McClanahan, Director of Utilities

DATE: March 7, 2017

SUBJECT: Docket Number: 16-KCPE-195-COM
In the Matter of the Complaint Against Kansas City Power & Light by Jamie Littich.

EXECUTIVE SUMMARY:

On December 14, 2016, Staff filed a Report and Recommendation (R&R) in the subject Docket listing our conclusions as to the cause and consequences of a secondary electric line failure in Shawnee, Kansas. Staff's investigation resulted in a recommendation to the Commission that Kansas City Power & Light (KCPL) be ordered to show cause as to why it should not be required to perform eight tasks related to ensuring the safety and quality of service to its residential customers.

On January 27, 2017, the Complainant filed a "Motion for Expansion and Clarification" of Staff's R&R in which the Complainant offered its opinions on various excerpts from Staff's Report and requested further investigation on some topics as well. In general, the Complainant agreed with Staff's analysis.

On January 30, 2017, KCPL filed its Response to Staff's R&R. In its Response, KCPL objects to Staff's recommendations and states the basis for Staff's recommendations is founded on a misapplication of the National Electric Safety Code (NESC) and unfounded conclusions. KCPL's Response then addresses each of the eight tasks Staff recommended be included in the Show Cause proceeding.

After reviewing the Responses from KCPL and the Complainant, Staff believes its original R&R provides an accurate analysis of the ground fault event, and we believe our recommendation warrants consideration from the Commission. In the following paragraphs, Staff provides commentary on KCPL's Response to Staff's original R&R and further defense of our position.

BACKGROUND:

As a prelude to discussing Staff's recommendations, KCPL provides a summary of its correspondence with the Complainant and also provides excerpts from its tariff. From Section 7.12 of its tariff, KCPL notes the company is not liable for claims for loss, expense or damage resulting from fluctuations, interruptions in or curtailment of electric service, or for any delivery delay, breakdown, or failure of or damage to KCPL facilities, except in the case of willful misconduct or gross negligence on the part of KCPL. In this case, electric service is defined as, "the availability of electric power and energy supplied by the Company at a point of delivery within the Company's service territory on or near the Customer's premises, at approximately the standard voltage and frequency for a class of service made available by the Company in that area."¹

Although the costs from damages related to the ground fault are referenced in the original Complaint, Staff's investigation and R&R did not address the responsibility of any party for the damages incurred. Should the Complainant or other affected parties wish to recover costs related to damages caused by this event, Staff believes their recourse for such action would be under the jurisdiction of district court if the Commission finds KCPL in violation of any provisions of the law.² In its R&R, Staff has recommended the Commission order KCPL to show cause as to why it should not be found in violation of the Commission's regulations adopted from the NESC.

Staff's investigation into this matter focused solely on determining the cause of the ground fault, the safety of the electric distribution system, and KCPL's emergency response practices. To complete this investigation, Staff relied upon numerous data requests from KCPL, meetings with KCPL, meetings with KCPL customers affected by the event, a meeting with the responding fire department, and correspondence with the Complainant.

The Complainant's property is served by a lateral line in Circuit No. 6824, which is comprised of one primary line, a shared primary/secondary neutral line, and two secondary lines operating at 120 volts each. During the ground fault event that occurred on May 20, 2015, Staff's investigation indicates the secondary system downstream of the affected distribution transformer experienced a bolted ground fault that caused an average of 300 amps of current flow across the fault for 58 minutes with a maximum of 950 amps. The normal peak current load for this secondary system is calculated to be 217 amps. The fault was de-energized by KCPL personnel manually opening the fuse connection above the transformer. As a result of this prolonged ground fault, the three homes whose neutral conductors were connected directly below the transformer suffered extensive structural damage to their homes with four additional customers (including the Complainant) suffering minor damage to electrical appliances.

ANALYSIS:

In the following paragraphs, Staff provides its Reply to KCPL's Response. The following paragraphs are numbered to correspond with the paragraphs in KCPL's Response:

Para. 9: "On May 20, 2015, KCP&L responded to a house fire at 5800 Walmer Street, Mission, Kansas, and a report of a wire down in the rear of the property, which is also

¹ Section 1.06, KCPL Tariff, Definition of Electric Service.

² K.S.A 66-176:

located on Circuit No. 6824. KCP&L removed the meter at 5800 Walmer Street, put the wire back in place, and re-energized the transformer for that location. KCP&L determined the likely cause of the downed wire to be a fallen tree limb due to a storm event that had recently occurred in the area.”

Staff Reply: In its description of the event that precipitated this Complaint, KCPL leaves out one critical step. That is, when KCPL arrived and found the wire down, the wire was still energized. KCPL had to manually de-energize the transformer by opening the fuse connection in order to pull the meter and put the wire back in place. The fact that the fuse was not activated by a bolted ground fault on the KCPL secondary system is the crux of Staff’s concern regarding this event.

Para. 17: “...Staff’s assertion that Part 1 of the NESC applies in this matter is incorrect. Part 1 of the NESC is titled “Safety Rules for the Installation and Maintenance of Electric Supply Stations and Equipment” which covers electric supply equipment, conductors, and structural arrangements in indoor and outdoor generating stations, switching stations, and substations. This section of the Code is not related to the type of facilities involved in this case as there are no generating stations, switching stations, or substations at issue in this matter. The section of the NESC applicable to the type of overhead facilities in question in this docket is an entirely different part of the code – Part 2, “Safety Rules for the Installation and Maintenance of Overhead Electric Supply and Communications Lines”. KCP&L is in compliance with both Part 1 and Part 2 of the properly applicable NESC requirements.”

Staff Reply: KCPL correctly quotes the title of Part 1 of the NESC. However, KCPL does not address the Scope of Part 1. In its R&R, Staff provided a paraphrase of the Part 1 scope. The scope of Part 1 in its entirety (with Staff emphasis added) is as follows:

Part 1. Rules for the Installation and Maintenance of Electric Supply Stations and Equipment.

Section 10: Purpose and Scope of Rules

100. Purpose: The purpose of Part 1 of this code is the practical safeguarding of persons during the installation, operation, or maintenance of electric supply stations and their associated equipment.

101. Scope: Part 1 of this code covers the electric supply conductors and equipment, along with the associated structural arrangements in electric supply stations, that are accessible only to qualified personnel. *It also covers* the conductors and equipment employed primarily for the utilization of electric power when such conductors and equipment are used by the utility in the exercise of its function as a utility.

As stated above, the fundamental issue in Staff’s R&R is the fact that the fuse above the transformer serving the Complainant did not function when the secondary distribution system experienced a bolted ground fault. In Staff’s opinion, the title and scope of Part 1 of the NESC clearly include equipment that is not necessarily within the confines of an Electric Supply Station. The NESC defines “equipment” as “a general term including fittings, devices, appliances, fixtures, apparatus, and similar terms used as part of or in connection with an electric supply or communications system.”³ The last sentence in the Scope of Part 1 also clearly states

³ Definition of equipment, page 6, section 2, Definitions of Special Terms, National Electric Safety Code, C2-1997.

that equipment employed for the utilization of electric power by a utility is covered by the scope of Part 1.

Para. 18: In paragraph 18 of its Response, KCPL again raises the issue of the applicability of Part 1 of the NESC. KCPL continues that Part 2 of the NESC is applicable to its facilities involved in this Complaint and notes that Part 2 recommends making repairs and managing vegetation as necessary.

Staff Reply: As discussed earlier, Staff disagrees with KCPL's interpretation of the scope of Part 1 of the NESC. Regarding maintenance of electric equipment, however, Section 121A of Part 1 and Section 214 of Part 2 of the NESC require inspection and repair of facilities when considered necessary. In its response, KCPL does not address the specific condition of its distribution system at issue or Staff's contention that additional tree trimming is necessary for this circuit. Staff's R&R contends that 15 splices and at least one "re-sag" across 6 spans of open wire secondary points to a need for maintenance. KCPL notes in footnote 8 of its Response that the trees behind the Complainant's home were over-trimmed in January 2016 to prevent additional vegetation issues. Staff notes, however, the distribution circuit serving the 5800 block of Walmer had several instances of tree branches in contact with electric conductors when Staff conducted a field tour in the summer of 2016. Staff's R&R recommends the Commission order KCPL to show cause as to why the facilities discussed in the R&R are not in need of repair and/or in need of additional tree trimming.

Paras. 19-20: In these paragraphs, KCPL states that Part 1 of the NESC does not apply to this section of distribution system as discussed previously. KCPL also distinguishes between distribution transformers that serve residential homes and power transformers that are located in substations. KCPL quotes an interpretation from a 2017 edition of a NESC handbook that supports its position that there is no rule specifying overcurrent protection for electric supply lines outside electric supply stations.

Staff Reply: For its evaluation, Staff relied on the 1997 edition of the NESC which is incorporated by reference into K.A.R. 82-12-2. That edition of the code does not state that Rule 161 applies only inside electric supply stations, nor does it distinguish between distribution transformers and power transformers. Staff continues to support its interpretation that the 1997 edition of the NESC demonstrates KCPL is in violation of Part 1, Section 161A.

In its R&R, Staff presented evidence that the secondary system serving the Complainant and nine additional residential homes experienced abnormally high electrical current and an electrified grounding system for up to 58 minutes until KCPL personnel manually opened the fuse above the transformer. Staff contended the abnormal condition could have been avoided if overcurrent protection had been appropriately sized to minimize bolted ground faults of the secondary system. KCPL does not refute or even address Staff's presented evidence. Rather, it states the NESC does not address such an issue and KCPL should not be considered in violation of K.A.R. 82-12-2. Regardless of a code violation, Staff believes the above described abnormal operating condition is fully within KCPL's power to correct. Under the provisions of K.S.A. 66-101b and 66-101h⁴, the Commission is obliged to

⁴ K.S.A. 66-101b: Every electric public utility governed by this act shall be required to furnish reasonably efficient and sufficient service and facilities; 66-101h: ...From time to time, the commission shall carefully examine and

determine if this scenario should be addressed. Therefore, Staff recommends the Commission require KCPL to show cause as to why it should not configure the overcurrent protective devices on its distribution transformers to address the above described abnormal operating condition.

Paras. 21-22: KCPL states a fuse coordination study to address the abnormal operating condition is unwarranted, and it does not typically perform wholesale fuse studies across its entire distribution system. KCPL contends that Staff has presented no evidence that a widespread problem exists with fuse coordination and a request for a system-wide study is a disproportionate response to a single incident. KCPL then explains it has been reviewing distribution fusing standards since 2013 and is in the process of stocking 10 amp fuses to protect 50 kVA distribution transformers as part of an effort to consolidate operational practices across its operating jurisdictions. In its Response, KCPL does not provide a timeline as to when this standardization process will be applied to legacy facilities such as the ones serving the Complainant that are at risk of bolted ground faults on the secondary with no overcurrent protection.

Staff Reply: In its investigation into this Complaint, Staff focused on obtaining evidence that supported its analysis and recommendations. KCPL's records of the event are conflicting and do not provide a clear description of the actions taken by personnel to clear the fault that precipitated this Complaint. KCPL has no analysis of its electrical system's role in causing the fire or the broken neutral wire. As part of this investigation, Staff interviewed personnel from Consolidated Fire District No. 2 (CFD2) that responded to the house fire associated with this investigation. The CFD2 report referenced in Staff's R&R supported Staff's findings as to what occurred with respect to KCPL's distribution system.⁵ Although Staff was unable to determine if other fires responded to by CFD2 had similar causes, it is Staff's distinct impression from interviewing CFD2 personnel that the KCPL customer's energized grounding system initiating a fire was *not* an unusual occurrence they had experienced in responding to fires caused by electricity. Neither KCPL nor CFD2 had any knowledge of the structural damage that occurred to the other two homes connected directly to the transformer. That information was derived from Staff interviewing KCPL's customers.

Staff is not requesting KCPL conduct a system-wide fuse coordination study. Rather, Staff is recommending the Commission order KCPL to show cause as to why it should not be required to provide a fuse coordination study that demonstrates how KCPL protects against overload of its secondary system. Staff also recommended the study explain why 10 amp fuses should not be used in conjunction with 50 kVA transformers particularly in view of the fact that the 20 amp fuse in service offered no protection in this instance to the customers.

Staff has not had the opportunity to review the 2013 fusing table standardization effort because its mention in KCPL's Response is the first time its existence has been brought to Staff's attention. However, Staff believes an implementation commitment is just as important as the development of a standard that addresses this issue. Therefore, Staff is recommending the Commission require KCPL to show cause as to why it should not be

inspect the condition of each electric public utility, its equipment, the manner of its conduct and its management with reference to the public safety and convenience.

⁵ CFD2 narrative of event that occurred on May 20, 2015: "...This fire is accidental in nature due to the electrical current back feeding into the house after the electrical lines failed outside."

required to develop new practices that provide overcurrent protection to its secondary distribution system.

Para. 24: Regarding a study of the 364 Kansas circuits that contain open wire secondary, KCPL notes these types of systems are legacy systems known to be in operation throughout the United States. KCPL also notes it has an Asset Management program and a Lateral Improvement program that determine which distribution facilities are most in need of attention. KCPL asserts Staff's recommendation for a study of its nearly 1000 miles of open wire secondary is a disproportionate reaction to a single incident.

Staff Reply: Staff believes an Asset management plan and lateral improvement program are important initiatives and fully supports that effort. However, we point out that both approaches are reactive by design. That is, a failure has to occur before its impact can be assessed to improve system performance. As noted in Staff's R&R, the six spans of secondary on the 5800 block of Walmer had at least 16 repairs.⁶ It is Staff's understanding that KCPL's 2016 lateral improvement program has scheduled maintenance that will replace 33% of the open wire secondary, as well as some poles and primary conductor for this portion of lateral.⁷ The scheduled work has not been completed to-date. Given the imminent safety threat associated with overcurrent protection of open wire secondary discussed in this Complaint, Staff believes a more detailed study that develops a proactive methodology to evaluating and repairing/replacing open wire secondary is warranted.

In its response to Staff Data Request 52, KCPL notes it operates only 314 miles of open wire secondary jurisdictional to this Commission. They also note in the DR52 response that a study of the open wire secondary was conducted at least in part 13 years ago. However, KCPL was unsuccessful in locating that detailed study in response to the DR and felt it would have limited usefulness at this time. Given that KCPL is not building any more open wire secondary, Staff believes it should be relatively simple to locate the 13-year old study and update it to include current information as to the continued aging of the system.

Staff recommended in its R&R that the Commission require KCPL to show cause as to why it should not provide a report of its legacy open wire secondary system that describes the condition of the system with a focus on preventing bolted ground faults such as the one that precipitated this Complaint.

Para. 25: KCPL states its first responders have the primary objective to restore power to customers safely and quickly, and they are not trained to conduct failure analyses for each response. Furthermore, KCPL contends a requirement to have KCPL first responders perform a failure analysis may result in slowing their response to other service restoration needs. KCPL notes their lineman did report a wire was down due to a limb coming down on secondaries.

Staff Reply: Firstly, KCPL's concern about failure investigation begs the question as to the accuracy of their Asset Management program. In Staff's opinion, if an operator is not tracking the reason for equipment failure such as conductor melting or fuses not opening during overcurrent events, it will be difficult to reach accurate asset management decisions. In its Response, KCPL presupposes the first responder linemen would necessarily complete

⁶ Response to Data Request 51.

⁷ Response to Staff Data Request 1-13.

the failure analysis. While the linemen's observations are a critical piece of the failure investigation, a follow up by properly trained investigators may be appropriate particularly in cases where the collateral damage from the electric system failure appears to be extensive. At the very least, a review of the responding fire department's report seems to be in order. In this case, the lineman notes the somewhat cryptic message of "wire down due to limb came down on secondaries". From the pictures taken by the responding fire department, there is no evidence of a tree limb contacting the secondary near where the neutral was broken. Staff believes a follow-up investigation by properly trained personnel, a review of the linemen's report by a supervisor and/or training linemen to record more accurate descriptions of what failed would provide KCPL with valuable information as to the integrity of its system.

In its R&R, Staff recommended the Commission order KCPL to show cause as to why it should not be required to improve emergency response procedures requiring KCPL first responders to perform and document a failure analysis for each outage occurrence. Staff would amend this recommendation to include the possibility of additional personnel be required to perform adequate failure analyses of KCPL equipment suspected of causing extensive collateral damage to property adjacent to the electric distribution system easement.

Para. 26: KCPL contends "requiring linemen or other field personnel to verify that service can be safely restored to each customer affected by an outage will cause unnecessary delays in restoring power to customers, and also unduly extends KCP&L's obligations beyond the maintenance and operation of its system to that of the customer's." In support of this position, KCPL points out its tariff only obliges the Company to supply electric service to the Customer's point of delivery which is, in general, the meter. KCPL argues a requirement to verify that electrical service can be safely restored to each customer affected by that outage before re-energizing the system would greatly expand the role of public utilities beyond the scope outlined in their tariff.

Staff Reply: Regarding this matter, Staff is recommending the Commission require KCPL to show cause as to why it should not be required to verify that electrical service can be safely restored to each customer affected by an outage that was caused by an overvoltage emergency in which KCPL is required to manually de-energize a portion of the secondary distribution system to control the abnormal condition. That is to say, no protective device such as a fuse operates to de-energize the secondary. As noted earlier, KCPL does not maintain records of abnormal operating events to this level of detail, but Staff assumes this type of failure would be a small percentage of the outages KCPL experiences.

K.S.A 66-101h obliges the Commission to examine the manner of conduct of an electric utility with reference to public safety. In the case of the three customers directly connected to the transformer in question, one had a house fire (the reason for the emergency call) and the other two sustained damage and fire related to the bolted ground fault. Neither of the two customers not involved in the original emergency call was home at the time of the event. The extent of the two minor fires were not known to the fire department or KCPL field personnel because they had not expanded to the point of involving a major part of the structures. After disconnecting the house with the obvious fire damage, KCPL re-energized the two homes with minor fire damage and damaged electrical systems. In Staff's view, such an action is potentially dangerous for the unsuspecting customer returning home after the event. Therefore, Staff believes some sort of

notification of the affected customer or system check is warranted. Staff notes a safety check of customers' utility systems after an abnormal operating event is a best management practice for gas utilities and not considered an excessive intrusion into customer's private property. With the widespread deployment of AMI meters throughout the KCPL system, Staff postulates it may be possible to use the post event meter reading to determine if any significant damage has occurred and take appropriate action. If no damage is indicated from the meter, a door hanger for the customer alerting them to the event that had occurred would be appropriate.

Para 28: KCPL asserts its Customer Service Representatives (CSRs) are professional and highly trained, and they have the ability to prioritize calls that involve a hazard. KCPL notes the CSRs are specifically trained to *not* offer advice or comment on the condition of a customer's wiring. If a customer doubts the integrity of its service, the CSRs have the option of sending a KCPL troubleman, requesting a KCPL planner to call the customer, or advising the customer to contact a professional electrician. KCPL contends Staff's R&R suggests KCPL take responsibility to know, inspect, and repair the customer's side of the service which is beyond the scope of KCPL's responsibility.

Staff Reply: Although Staff did not review the syllabus for the training provided to the CSRs, the audio recording of the conversation between the CSRs and customers involved in the incident indicates to Staff the CSRs are professional, trained, and dedicated to serving the KCPL customers to the best of their ability. However, in listening to the calls, it is Staff's opinion the tools available to the CSRs limit their ability to evaluate whether a troubleman, a planner, or a professional electrician is the appropriate course of action in response to the customer. In response to customer inquiries after the bolted ground fault was repaired, all three options were given to customers. Based on the calls, it appears to Staff the CSRs were unable to access information readily available through various parts of the KCPL system in order to evaluate how rapid a response was necessary for each customer that called. In the case of the house that initiated the emergency call and had the meter pulled, the CSR had sufficient information to advise the customer that it was the customer responsibility to hire an electrician. However, in the cases involving the two homes directly behind the fire location, the CSR had no knowledge of any event that could have impacted those customers. When one of the customers reported a safety concern, the CSR stated a KCPL planner would call him. In Staff's view, this approach may have prolonged a safety threat to the customer. In the other case, five days after the event, an electrician hired by the homeowner states the homeowner system presents a safety hazard and the CSR advised the caller that personnel will be dispatched as soon as they are available. In this case, it appears the service was disconnected within 24 hours of that call; however, in subsequent calls for the same address, the CSR still shows the meter to be connected. In Staff's opinion, the confusion demonstrated by the CSRs in trying to understand what had happened in the field in conjunction with the need get a timely evaluation by KCPL personnel can be easily resolved by providing the CSR with a greater ability to evaluate events on KCPL's system that may have affected a given customer.

Staff is not recommending KCPL take responsibility of the customer's side of the point of delivery. In its R&R, Staff is recommending the Commission order KCPL to show cause as to why it should not be required to create greater information sharing between field operations and customer service such that CSR's are better informed as to the need for rapid response from KCPL based on the customer's call. As in earlier discussions in this Reply, Staff's recommendation regarding CSRs only pertains to those events where an abnormal operating

condition requires KCPL to manually de-energize a portion of the secondary distribution system to control the abnormal condition.

CONCLUSION:

Staff believes its recommendations in its first R&R are appropriate, and we continue to recommend the Commission rule on Staff's recommendations. Staff notes it is not recommending the Commission order KCPL to perform the various tasks outlined in the R&R. Rather, Staff is recommending the Commission order KCPL to show cause as to why it should *not* be required to take the actions outlined in the Report. Staff acknowledges that KCPL may have reasons for not accepting Staff's recommendations, or it may suggest alternatives to Staff's recommendations. We further note KCPL does not refute Staff's description of the event that led to the Complaint or the gravity of the safety threat associated with the event. Because of the inherent safety risks outlined in Staff's original R&R and further expounded upon in this Reply, Staff believes sufficient evidence has been compiled and questions raised that require a more comprehensive review.

CERTIFICATE OF SERVICE

16-KCPE-195-COM

I, the undersigned, certify that a true and correct copy of the above and foregoing Notice of Filing of Staff's Second Report and Recommendation was served by electronic service on this 8th day of March, 2017, to the following:

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