

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

Before Commissioners: Pat Apple, Chairman
Jay Scott Emler
Shari Feist Albrecht

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

MOTION TO DISMISS KCPL's EXTENSION OF TIME

I'm requesting the commissioners dismiss KCPL's current motion for an extension of time because the provided rationale is inadequate and the long duration of the extension is unreasonable. KCPL claims that *"certain portions of Staff's Report will require significant time and personnel resources of KCP&L in order to respond accordingly"* however there was little, if any, new information to address. KCPL has already been allowed extensions of time to address the facts of the case and the recommendations of the staff. Additionally, given recently observed lateral activities and past responses from KCPL, it appears that KCPL may instead require 30-days to perform compliance work that they will use to argue in their next filing. Compliance efforts are inevitable and do not undo the damages that are already incurred and thus should be given little weight in deciding whether or not to allow the extension or rule on the violation.

I do however appreciate that the Commissioners, Staff and GPE (KCPL's holding company) are in the middle of a large and extensive acquisition approval. I do not want to interfere with that proceeding and will accommodate KCC and KCPL staff's availability. If an extension is to be granted to KCPL, please consider March 31, 2017 to be adequate.

Finally, assuming that the lateral compliance work will be performed while the system is energized, I'd simply like to request that the compliance work is sequenced so that circuit protections (fuses) are updated first. There were contractors in the lateral on Saturday March 18th, 2017 and it was not apparent as to whether they were aware of the inherent risk to themselves and to everyone else if the degraded system and structural components were mishandled and failed. No advisory or other warning has been issued.

Respectfully submitted,

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