

**/BEFORE THE STATE CORPORATION COMMISSION SEP - 4 2015
OF THE STATE OF KANSAS**

Office of General Counsel

In the Matter of the Complaint Against)
Kansas City Power & Light Company by) Docket No. 15-KCPE-474-COM
Keith S. Carpenter and Barbara D. Carpenter)

**Answer to KCP&L's Answer and Motion to Dismiss
Complaint of Keith S. and Barbara D. Carpenter**

KCP&L argues that the AMI meter they want to place on our home and the AMR meter that is on our home now have "similar radio frequency ("RF") and have similar capabilities with regard to customer usage data transmission to KCP&L." Later on in their answer, KCP&L maintains that both meters operate on the same frequency. The AMR is only capable of sending pulses, not receiving them from KCP&L nor from other meters.

When our AMR meter was installed about 20 years ago, we were not informed by KCP&L that it was not a regular analog meter as it appeared to be. We had no idea that it was any different than the meter it replaced. Not until recently did we learn that it too, was a smart meter in that it sends wireless messages to KCP&L. KCP&L also calls the AMR meter a smart meter, "At the time of the 07-116 Docket, KCP&L had already implemented 'smart meter' technology through its AMR meter program deployed during the mid-1990s."

We stated in our requests for action by the Commission, "KCP&L will install only conventional non communicating analog meters for customers who choose to opt out." We do not want a smart meter of any kind, AMI or AMR. KCP&L states that our current meter communicates usage data to KCP&L via RF in the same manner as the new AMI meter. That is no reason why we should be willing to have a more sophisticated smart meter installed in its place.

KCP&L maintains that "The new AMI meter meets all applicable FCC regulations and American National Standards Institute ("ANSI") standards." There are many scientific and medical researchers that have come to a different conclusion. Some of these findings are documented in our amended complaint.

We noticed that the Grant of Equipment Authorization Certification issued under the authority of the Federal Communications Commission was dated 02/04/2015. That was nearly three months after KCP&L's first attempt to install an AMI meter on our house.

KCP&L made the following comment about the documentation with our amended complaint: "Regarding the documentation provided in the Amended Complaint, KCP&L is without sufficient knowledge to admit or deny the statement contained therein and denies same." It appears that they are denying information about which they have little or no knowledge.

KCP&L argues that our "request for the commission to impose opt-out provisions would reduce the benefits of the AMI meter program and introduce additional costs for manual meter reading and data entry." We are willing to save the cost of a meter reader by reading the meter ourselves and sending or e-mailing the readings to KCP&L.

KCP&L argues that our amended complaint be dismissed on the basis that it fails to state a claim upon which relief can be granted. Since one of the items in the missions statement of Kansas Corporation Commission is to protect the public interest by regulating the safety of public utilities we believe that the Commission is within its jurisdiction to do just that.

We request that the Kansas Corporation Commission deny KCP&L's motion for an order dismissing the Amended Complaint (Docket No. 15-KCPE-474-Com).

Sincerely yours,

Keith S. Carpenter
Barbara D. Carpenter
Keith S. and Barbara D. Carpenter

September 1, 2015