

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

In the Matter of the Complaint Against ) Docket No. 15-WSEE-211-COM  
Westar Energy by Jami Riehm )

In the Matter of the Complaint Against ) Docket No. 15-KCPE-265-COM  
KCP&L by Denen Roberts )

**STAFF'S MOTION TO CONSOLIDATE**

The Staff of the State Corporation Commission of the State of Kansas ("Staff," and "Commission," respectively), files this Motion to Consolidate Docket No. 15-WSEE-211-COM ("211 Docket") and Docket No. 15-KCPE-265-COM ("265 Docket"). In support of the aforementioned request, Staff states as follows:

1. On November 19, 2014, Jaime Riehm filed a Complaint against Westar Energy, Inc. ("Westar"). Staff initially rejected the Complaint for not complying with procedural requirements outlined in K.A.R. 82-1-220, and provided Jamie Riehm an opportunity to amend her Complaint. Ms. Riehm timely amended her Complaint on December 12, 2014.
2. In Ms. Riehm's Amended Complaint against Westar, Ms. Riehm argues that Westar's use of smart meters are: (1) causing health problems and noise pollution in violation of Westar's tariffs, and (2) willfully and wantonly causing health problems from radiation emitting from said meters.
3. On December 18, 2014, Denen Roberts filed a Complaint against Kansas City Power and Light Company ("KCP&L"). Staff initially rejected the Complaint for not complying with procedural requirements outlined in K.A.R. 82-1-220, and provided

Denen Roberts an opportunity to amend her Complaint. Ms. Roberts timely amended her Complaint on January 23, 2015.

4. In Ms. Roberts' Amended Complaint against KCP&L, Ms. Roberts argues that KCP&L's smart meters are emitting radiation that is harmful to her, and the public's health.

5. On December 22, 2014, Westar moved to dismiss Ms. Riehm's Complaint.

6. On February 9, 2015, KCP&L moved to dismiss Ms. Roberts' Complaint.

7. Because the issues presented in the 211 Docket and the 265 Docket are rooted in substantially similar subject matter, and in an effort to maximize the efficient use of Commission resources, Staff requests consolidating the dockets and inviting other utilities that use smart meter technology to intervene. For this reason, Staff requests that Commission Docket No. 15-ONEP-297-TAR and Docket No. 15-ONEP-329-COC be consolidated.

WHEREFORE, Staff requests the Commission grant Staff's Motion to Consolidate Docket No. 15-WSEE-211-COM and Docket No. 15-KCPE-265-COM, and for any such other relief as the Commission deems just and proper.

Respectfully submitted,

  
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REV/tc

STATE OF KANSAS        )  
                              ) ss.  
COUNTY OF SHAWNEE    )

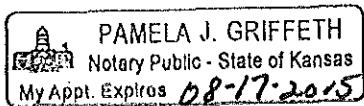
**VERIFICATION**

Robert E. Vincent, 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 *Staff's Motion to Consolidate* and that the statements contained therein are true and correct to the best of his knowledge, information and belief.



Robert E. Vincent, Litigation Counsel # 26028  
Kansas Corporation Commission of the  
State of Kansas

Subscribed and sworn to before me this 17 day of February, 2015.



Pamela J. Griffeth  
Notary Public

My Appointment Expires: August 17, 2015

## CERTIFICATE OF SERVICE

15-WSEE-211-COM ↴ 15-KCPE-265-COM

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing Staff's Motion to Consolidate was served by electronic service on this 17th day of February, 2015, to the following:

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