

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

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

**KANSAS CITY POWER & LIGHT COMPANY'S RESPONSE
TO STAFF REPORT AND RECOMMENDATION**

Kansas City Power & Light Company ("KCP&L" or "Company"), by and through its counsel, hereby submits its response ("Response") to the *Notice of Filing of Staff's Report and Recommendation* ("Staff Report") of the Staff of the State Corporation Commission of the State of Kansas ("Staff" and "Commission," respectively), filed on December 15, 2016.

Staff's Report recommends that this docket be converted from a complaint proceeding to a Show Cause proceeding or that a new Show Cause proceeding be opened based on its mistaken allegation that KCP&L has violated the national Electric Safety Code ("NESC"). KCP&L will show that it has not violated the NESC. A Show Cause proceeding is unnecessary and inappropriate.

I. PROCEDURAL BACKGROUND

1. On November 3, 2015, the Commission issued its Order Adopting Legal Memorandum, wherein it directed the complaint filed on October 21, 2015 ("Complaint") by Ms. Jamie Kathleen Littich ("Complainant"), be served on KCP&L.

2. KCP&L and Complainant filed responsive pleadings to one another. The last such pleading was filed by KCP&L on February 3, 2016.

3. On March 29, 2016, the Commission issued its *Order Designating Prehearing Officer; and Protective and Discovery Order*. Beyond the filing of nondisclosure certificates by

Complainants, no other formal filings were made in this proceeding until Staff filed its Report on December 15, 2016.

4. On December 22, 2016, and December 27, 2017, KCP&L and Complainant respectively filed motions for an extension of time, until January 30, 2017, to file a response to Staff's Report.¹

5. On December 28, 2016, the prehearing officer in this matter issued an Order granting the extensions.

II. FACTUAL BACKGROUND

6. Complainant has had service at the property at 5748 Walmer Street, Mission, Kansas since May 2, 2011.

7. KCP&L's system is comprised of networks of electric lines that are divided geographically into what are referred to as "circuits." 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.

8. In accordance with Commission-approved tariffs, KCP&L is responsible for its facilities up to the point of delivery,² and the Customer is responsible for installing and maintaining all wire beyond the point of delivery.³ The point of delivery is defined as "[t]he point at which the Company's conductors and/or equipment (other than the Company's meter installation) make electrical connection with the customer's installation, unless otherwise

¹ On January 27, 2017, Complainant filed a Motion for Expansion and Clarification in response to Staff's Report which appears to be a list of questions for Staff and discovery for KCP&L. KCP&L has not had sufficient time to review Complainant's Motion and does not address it in this Reply.

² General Rules and Regulations §§ 7.04-.05.

³ General Rules and Regulations § 6.01.

specified in the customer's service agreement.”⁴ The tariffs further provide that “[a]ny Customer desiring protection against interruptions, phase failure, phase reversal, voltage variations or other temporary irregularities in electric service shall, at his own expense, furnish on such Customer's installation such protective equipment for such purpose.”⁵

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 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.

10. On May 26, 2015, Complainant contacted KCP&L's customer service division to request a damage claim form, which was subsequently mailed to Complainant. KCP&L informed Complainant that his damage claim form would arrive in a week. During the call, Complainant was asked by KCP&L whether Complainant had a surge protector on his home, to which Complainant responded, “no”.

11. On May 28, 2015, Complainant again contacted KCP&L to inquire as to the status of the damage claim. KCP&L informed Complainant again that within a week of the initial contact, Complainant should receive a letter from KCP&L that includes the damage claim form that needs to be completed and submitted back to KCP&L. During the call, Complainant again confirmed that there was no surge protection on the home.

12. On August 11, 2015, Complainant filed a completed Property Damage Claim Form (“Claim”) in the amount of \$3,074.62 for damages to appliances related to the outage that occurred on May 20, 2015.

⁴ General Rules and Regulations § 1.11.

13. On September 10, 2015, KCP&L provided a written response to Complainant regarding the Claim, offering an explanation as to the events of May 20, 2015, and further explaining that KCP&L 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 KCP&L facilities, except in the case of willful misconduct or gross negligence on the part of KCP&L.

14. On October 21, 2015, Complainant filed a formal complaint with the Commission requesting that the Commission review the May 20, 2015 event, require KCP&L to upgrade its service as necessary to avoid similar events, and provide “an official report for the affected parties so that it may aid in the timely subrogation of damages through their home insurance via KCPL’s general commercial insurance or similar.”

15. KCP&L has worked with Staff for the past year answering data requests and holding several conference calls/meetings with Staff to educate them on our system and system requirements. Through discovery, KCP&L has learned that Ms. Littich has been a primary source of data and information on electrical systems and associated requirements for Staff.⁶ KCP&L is unaware of Ms. Littich’s credentials regarding electrical systems, specifically KCP&L’s electrical distribution system and the requirements associated with our system.

III. REPLY TO STAFF REPORT

16. In its Report, Staff recommends that Commission “either convert this matter to a Show Cause proceeding, or open a new Show Cause docket[,]” and further offers eight (8) items that it recommends the Commission direct KCP&L to address.⁷ KCP&L does not believe that

⁵ General Rules and Regulations § 6.02.

⁶ KCC responses to KCP&L data requests Nos. 2 and 3.

⁷ Notice of Filing of Staff’s Report and Recommendation, p. 1.

either converting this matter to a Show Cause proceeding or opening a separate Show Cause docket is appropriate. As KCP&L will explain in this Response, the basis for Staff's recommendations is founded on a misapplication of the National Electric Safety Code ("NESC"), and unfounded conclusions. In addition, Staff has created analyses based on speculation and assumptions that cannot be proved, and has used conclusions drawn from those analyses to make recommendations solely on the basis of a single isolated incident. Staff has presented no evidence or argument to suggest that there are any problems across the KCP&L system that would presume the need for broad system-wide actions such as those recommended. KCP&L will now respond to each item identified by Staff and explain why Staff's recommendations are either unnecessary or unsupported.

A. *KCP&L is not in violation of the National Electric Safety Code for failure to properly trim vegetation and provide appropriate fusing to protect its secondary distribution system.*

17. Staff alleges that, as it pertains to this matter, KCP&L is in violation of Part 1 of the NESC, because the NESC scope of Part 1 "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" and as such "Part 1 clearly applies to KCPL in this instance." 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.

18. More specifically, Staff alleges that KCP&L is in violation of NESC Part 1, Sections 121A, 153, and 161A. NESC Part 1, Section 121A requires defective equipment or wiring to be put in good order or permanently disconnected. Staff contends that the existence of splices and crimping along the Secondary wiring and the fact that vegetation appears to be the cause for such wire condition evidences a violation of Section 121A. As noted above, this provision applies to generating station, switching station, and substation maintenance, not maintenance of overhead lines, and therefore no violation exists. Part 2 of the NESC, which *does* pertain to overhead lines, states that “Lines and equipment shall be inspected at such intervals as experience has shown to be necessary” and “conditions and defects shall be designated for correction”. KCP&L performs inspections as well as maintenance on its distribution facilities as required by this section of the NESC. Part 2 of the NESC also states “[v]egetation management should be performed around supply conductors and communication lines as experience has shown to be necessary” and “[i]t is not practical to prevent all tree-conductor contacts on overhead lines”. KCP&L has a vegetation management program that is committed to delivering safe, reliable electricity while protecting tree growth, and in fact, KCP&L has received the Arbor Day Foundation’s Tree Line USA award every year since 2003 because of this commitment. KCP&L has also received numerous reliability awards over the years.⁸

⁸ In addition to its regularly scheduled trimming cycle, KCP&L requested that its tree trimming contractors over-trim the secondaries behind complainant’s home in order to better prevent any additional vegetation issues. That work was completed in January of 2016.

19. Staff also states that “failure to provide appropriate fusing to detect and react to a secondary fault...violates”⁹ NESC Part 1, Section 153, Short Circuit Protection of Power Transformers. As this provision is in Part 1 of the NESC, as noted before, it applies to generating stations, switching stations, and substations, not Distribution Transformers or overhead lines, and therefore no violation exists. Power transformers by definition are only located in generating stations and substations; thus, there is no corresponding rule in Part 2 of the NESC.

20. Staff also claims KCP&L is in violation of Part 1, Section 161A, Overcurrent Protection, alleging KCP&L’s secondary conductors were not protected from excessive heating with a failure to provide appropriate fusing as the reason for the excessive heating. Once again, this provision is in Part 1 of the NESC, which again, applies to generating stations, switching stations, and substations, *not* overhead lines, and therefore no violation exists. The NESC Handbook Premier Edition¹⁰ states the following, “Rule 161 applies in electric supply stations; there is no corresponding rule specifying overcurrent protection for electric supply lines outside of electric supply stations.”

B. Staff’s recommendation to develop a fuse coordination study is unwarranted.

21. Staff’s recommendation that KCP&L be directed to “[d]evelop a fuse coordination study that demonstrates how KCPL protects against overload of its secondary system” is misguided considering there is no NESC requirement to provide overcurrent protection for electric supply lines outside of electric supply stations (See NESC Handbook Premier Edition, Part 1, Section 161). However, KCP&L does routinely perform fuse coordination studies for new installations, major system reconstructions, or reconfigurations

⁹ Staff Report, p. 9.

where multiple protective devices are expected to be deployed in series. KCP&L does not typically perform wholesale fuse studies across its entire distribution system, which, to its knowledge, is consistent with practices at other utilities. Staff has not presented any evidence to validate that it has knowledge of public utilities regulated by the Commission that have been required to perform such studies. Staff has presented no evidence that a widespread problem exists with KCP&L's fuse coordination. As such, a system-wide study as recommended by Staff is a disproportionate response to a single incident.

C. KCP&L is already in the process of adopting the use of 10 amp fuses to protect 50 kVA transformers.

22. The Commission need not require KCP&L to adopt the use of 10 amp fuses to protect 50 kVA distribution transformers. KCP&L, as part of its ongoing Standards Engineering activities, began reviewing distribution fusing standards in 2013 with the goal of standardizing fusing tables across our entire system. The first standards to be reviewed were capacitor and transformer fuses because it was not necessary to coordinate them with any downstream protective devices. The objective of this review was to develop consistent equipment fusing tables across all KCP&L jurisdictions. Prior to this review there were two capacitor fusing tables (KCP&L Legacy and GMO) and three transformer fusing tables (KCP&L Legacy Metro, KCP&L Legacy Districts, and GMO) in the construction standards. The fusing in all these tables provided the necessary system protection; however, in order to consolidate operational practices across all the jurisdictions the decision was made to move to one table for capacitors and one table for distribution transformers. The capacitor fusing table was completed first and this change has been fully implemented. The transformer fusing table is more complicated and has recently been completed. KCP&L is currently in the process of stocking appropriate levels of

¹⁰ 2017 NESC Handbook Premier Edition – © 2016 IEEE

various size fuses to accommodate the new transformer fusing table which does include the use of 10 amp fuses to protect 50 kVA distribution transformers. As previously mentioned these changes are being implemented to consolidate operational practices across all KCP&L jurisdictions, and not due to any known or perceived deficiency with the previous fusing standards. For that reason, the new fusing standards will be utilized for new installations and replacement due to normal operations.

D. KCP&L has verified that its current Fuse Coordination Table is compatible with current industry standards.

23. Staff's representation of KCP&L's distribution transformer fusing table and its current status is misleading. Table N-902, the KCP&L distribution transformer fusing table from 40 years ago, was provided as a representation of the coordination standard in place at the time the facilities in the area in question were installed. In response to KCC Staff Data Request No. 50, KCP&L provided that 1972 was the earliest version of the table that could be found on record. While it is true that the specific transformer/fuse combination referenced in this case did not change until recently (see item C above), updates have been made to the distribution transformer fuse standards in the intervening years. The newly consolidated distribution transformer fusing table, as well as all previous distribution transformer fusing tables, is/are compatible with industry standards.

E. KCP&L already has good processes in place to identify and address areas of concern on its system

24. KCP&L has a long-standing history of serving its Kansas customers safely and reliably, and has won multiple awards over the years for its efforts. While a study of the open wire secondary facilities has not been undertaken recently, past studies have not shown that major changes to the system were necessary. Open wire secondary systems are a reality of legacy distribution systems, and are known to be present on distribution systems all over the

United States, with no indication of inherent safety risk outside that normally associated with live electrical facilities. KCP&L reports annually on its Worst Performing Circuits pursuant to Docket No. 02-GIME-365-GIE, and through that effort actively seeks out and mitigates poor system performance. Additionally, KCP&L has an active internal Asset Management program that evaluates opportunities to invest in programs that improve system performance and service to customers, while capturing the best value for ratepayers. Staff is, in fact, aware of KCP&L's Lateral Improvement Program – a non-mandated effort conceived by KCP&L for the express purpose of identifying lateral facilities that have a history of outages, investigating causes, and initiating work to address issues found. KCP&L assesses its system through these programs, as well as during the course of normal operations to determine which distribution facilities are in most need of attention and/or study.¹¹ KCP&L has over five million feet (close to 1000 miles) of open wire secondary facilities. Staff's recommendation for a study of all of those facilities is again a disproportionate reaction to a single incident.

F. Requiring linemen or other field personnel to perform a “failure analysis” for all outages will cause unnecessary delay in restoring power to customers.

25. KCP&L first responders have the primary objective to restore power to customers safely and quickly. As such, the failure analysis procedure recommended by Staff is not only outside the scope of such personnel, who are not forensic investigators by training, but also has the potential to result in a degradation of customer service by causing unnecessary delays in restoration of service after outages. In an outage response with a downed conductor, KCP&L's

¹¹ While footnote 8 of Staff's report states that the “insulation” of KCP&L's secondary conductors was “shredded,” KCP&L notes that *insulation* is not a term that is used among industry professionals for this specific kind of covering. The tree wire described by Staff is neither treated nor classified as “insulated” wire. And the natural deterioration of the covering is not in itself an indication of the integrity of the conductor, or its remaining life or operability. Therefore, the lack of a coating on the wire is not evidence of poor maintenance as Staff's Report would suggest.

goal is to address unsafe conditions due to the downed conductor, and to safely restore power as quickly as possible. Requiring first responders to “perform and document a failure analysis for each outage occurrence” means that customers will have to wait longer before having their power restored, as first responders are forced to combine trying to restore power with gathering evidence for the analysis and investigation. Also, investigation efforts could cause unnecessary delay to the responder’s response to the next trouble call. In the case of storm incidents, depending on the severity and scope of the storm, requiring analysis of each outage situation could cause significant and unnecessary delays. This requirement would be an additional unnecessary burden on restoration activities, as responders again are forced to divide their efforts between restoration and investigation. Although linemen do not engage in a formal investigation, they often do report their findings to dispatch. They did so in this case. Dispatch recordings show that lineman Wade Murphy informed dispatch that “wire down due to limb came down on secondaries.” To require lineman to do additional investigation is unnecessary and would only prolong restoration efforts. In its Answer to the initial Complaint, KCP&L did its best to summarize what most likely occurred based on the evidence available at the time. And based on the words of KCP&L’s lineman, who attended the scene and restored power, a tree limb was to blame.

G. 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.

26. KCP&L Schedule 1.55 - Kansas Rules and Regulations, Section 7, Utility’s

Service Obligations states:

7.05 Company Responsibility:

The obligation of the Company to supply electric service to the Customer shall be completed by the supplying of such electric service at the Customer’s point of

delivery for the operation of all electrical equipment on the premises of the Customer. The Company shall not be obligated to supply electric service to a Customer for a portion of the electrical requirements on the premises of the Customer, except pursuant to an applicable rate schedule therefore. The responsibility of the Company for the quality of service and the operation of its facilities ends at the point of delivery. The Company shall be required only to furnish, install and maintain one connection from its distribution facilities, service conductors from such connection to the Customer's point of delivery and one meter installation to measure such electric service to the Customer.

KCP&L Schedules 1.48 and 1.50 - Kansas Rules and Regulations, Section 6, Customer's Service

Obligations state:

6.01 Customer's Installation:

Any and all wiring, appliances, or equipment required to transform, control, regulate, or utilize beyond the point of delivery the electric service supplied by the Company shall be furnished, installed and maintained by, and shall be the sole responsibility of the Customer.

6.06 Inspections and Recommendations:

The responsibility of the Customer regarding his use of the electric service supplied by the Company is not set aside, and the Company shall in no way be liable, on account of any inspections or recommendations by the Company which are made as a courtesy to the Customer or as a protection to the electric service supplied by the Company to its other Customers. The Company reserves the right, but assumes no duty, to inspect the Customer's installation.

27. KCP&L field personnel are trained to, and experienced in, assessing the condition of utility-owned facilities and visible interconnection to customer-owned facilities, to decide whether it is safe to restore service to the system. In fact, Staff acknowledges that KCP&L did perform such an assessment in not restoring power to the premises known to have fire damage. Requiring KCP&L to evaluate each customer's facilities suggests that KCP&L field personnel should perform evaluation of equipment or otherwise assess systems inside the customer's home – a function that extends beyond the obligations specified by tariff, and furthermore is not a function utility field personnel are trained to perform. Additionally, it is impractical to suggest that KCP&L verify the condition of facilities beyond the meter, not only

because it is contrary to the tariff, but because it is potentially an unnecessary and excessive intrusion on customer's private property, and would compel KCP&L to leave the service off until the customer can be contacted, in the event that customer is away for an extended period. This further creates the possibility that KCP&L would not restore service until affirmative confirmation can be made as to the condition of customers' facilities, which could result in the loss of refrigerated goods and other losses that might occur due to a prolonged interruption that might be wholly unnecessary. In this sense, Staff is recommending protocol based not only on the exception rather than the rule, to the effect of potential adverse impact to customers, but also that is contrary to the obligations set forth in the tariff. Adoption of such a recommendation would be unprecedented because it would greatly expand the role of the public utilities, and such a recommendation also implicates other public utilities in the State. Moreover, Staff acknowledges that it has no written information or documentation from electric public utilities regulated by the Commission requiring that said utilities perform any such additional evaluation or customer communication as articulated in Staff's recommendation¹².

H. Modifications to KCP&L's customer service practices are unwarranted.

28. KCP&L's Customer Service Representatives ("CSRs") receive 360 hours of training, 138 hours of which are spent on actual calls before they may take calls without supervision. Thus, CSRs are highly trained professionals who must respond appropriately to a wide variety of customer issues on a daily basis. Beginning in November 2015, all KCP&L CSRs received additional training regarding the increased level of specificity required on dispatch/trouble communications. During a call, if there is information needed that the CSR does not have, the CSR may reach out to dispatch to obtain the information needed. However,

¹² Staff response to KCP&L Data Request No. 1.

most of the information required by the CSR for the majority of customer calls is available with the current software. KCP&L CSRs have access into the Network Management System (NMS) system which will show outages, the number of affected customers, and the outage cause, if known. CSR supervisors have access into dispatch's Oracle Business Intelligence for Utilities (OBIU) system, allowing access to additional information on outages including all addresses affected by a particular outage. Finally, CSRs have the ability to mark calls involving a hazard to the forefront so that dispatch will give such calls priority status. This is routinely done. KCP&L is confident that it has some of the most competent and highly trained CSRs of any utility and is constantly looking for opportunities to improve its service.

29. Nevertheless, despite all their training and expertise, due to the same Rule cited in the section above, KCP&L's CSRs are trained never to advise or comment on the condition of the customer's wiring. In fact, it would be unsafe for a CSR to do so. Rather, CSRs will deploy a KCP&L troubleman to inspect KCP&L's side of service if a customer doubts the integrity of the service at their residence or business. Alternatively, the CSR may have a planner call the customer for more detailed review of the customer's electrical issues. If the customer still reports electrical problems, the CSR will inform the customer to contact a licensed electrician. This is the safest route whenever customers have questions regarding the safety of the service at their home or business.

30. To address the specific call outlined in Staff's Report, and in Exhibit 10, Staff notes that 5800 Walmer called KCP&L on May 21, 2015 at 11:21 a.m. As noted in the Exhibit 10 summary, that customer sought to have power restored but the "CSR [was] unaware of previous day's event". Staff's summary, however, goes on to state that "record[s] shows house on fire and meter pulled." The CSR, therefore, had determined that the customer's meter was

pulled due to fire. What the CSR could not determine was the condition of the customer's wiring following the fire. This is something that only a qualified electrician could determine and this is what did eventually occur before power could be restored to the home. The CSR, therefore, correctly determined that work would need to be completed on the customer's side of service before power could safely be restored. Five days later, the customer called KCP&L again on a billing inquiry and confirmed that her home would need internal restoration work before power could be restored.

31. Staff's Report appears to suggest that KCP&L take responsibility to know, inspect, and repair the customer's side of service. This is a clear departure from KCP&L's Rules and Regulations that govern where KCP&L's responsibility begins and ends. KCP&L does not employ electricians for work on customers' service. Such internal electrical work requires knowledge of the National Electric Code (NEC), not the NESC - the code to which KCP&L adheres.

IV. CONCLUSION

32. In conclusion, the analysis in Staff's Report is based on a misguided application of the NESC. KCP&L is not in violation of the NESC, as set forth above. Further, Staff's recommendations that the Commission require KCP&L to perform certain actions are either unnecessary or unwarranted. Staff's recommendations in some instances would be contrary to KCP&L's approved tariffs, expand the role of public utilities, and result in expensive and unnecessary changes for all electric utilities across the state of Kansas.

WHEREFORE, for the reasons set forth above, KCP&L respectfully requests the Commission reject Staff's recommendations and instead dismiss the Complaint, with prejudice, and for other relief as the Commission deems just and reasonable.

Respectfully submitted,

/s/ Robert J. Hack

Robert J. Hack (KS #12826)
Telephone: (816) 556-2791
E-mail: rob.hack@kcpl.com
Roger W. Steiner (KS #26159)
Telephone: (816) 556-2314
E-mail: roger.steiner@kcpl.com
Kansas City Power & Light Company
One Kansas City Place
1200 Main Street – 19th Floor
Kansas City, Missouri 64105
Facsimile: (816) 556-2787

/s/ Terri Pemberton

Glenda Cafer (KS #13342)
Telephone: (785) 271-9991
Terri Pemberton (KS #23297)
Telephone: (785) 232-2123
CAFER PEMBERTON LLC
3321 SW 6th Avenue
Topeka, Kansas 66606
Facsimile: (785) 233-3040
E-mail: glenda@caferlaw.com
E-mail: terri@caferlaw.com

**COUNSEL FOR KANSAS CITY POWER &
LIGHT COMPANY**

VERIFICATION

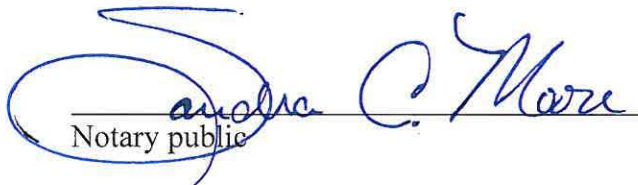
STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

The undersigned, Craig Parmeley, upon oath first duly sworn, states that he is the Manager, Standards for Kansas City Power & Light Company, that he has reviewed the foregoing Response, that he is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of his knowledge and belief.



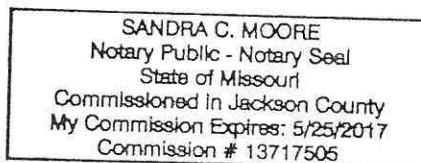
Craig Parmeley
Manager, Standards
Kansas City Power & Light Company

Subscribed and sworn to before me this 30th day of January 2017.


Notary public

My commission expires:

May 25, 2017



CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above was electronically served, hand-delivered or mailed, postage prepaid, this 30th day of January, 2017 to:

Brian G. Fedotin, Deputy General Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027
b.fedotin@kcc.ks.gov

Michael Neeley, Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027
m.neeley@kcc.ks.gov

Jamie Kathleen Littich
5748 Walmer Street
Mission, KS 66202
jamiekw73@gmail.com

Mary Britt Turner
Kansas City Power & Light Company
1200 Main Street, 19th Floor
Kansas City, MO 64105
mary.turner@kcpl.com

/s/ Terri Pemberton

Terri Pemberton