

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Establishment of a Working )  
Case for the Writing of a New Rule on the Treatment ) Case No. AW-2018-0393  
of Customer Information by Commission Regulated )  
Electric, Gas, Steam, Heating, Water, and Sewer )  
Utilities and Their Affiliates and Non-Affiliates )

**KANSAS CITY POWER & LIGHT COMPANY’S AND  
KCP&L GREATER MISSOURI OPERATIONS COMPANY’S  
COMMENTS ON PROPOSED NEW RULES  
REGARDING TREATMENT OF CUSTOMER INFORMATION**

Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively, the “Company”) hereby responds to the Missouri Public Service Commission’s (“Commission”) *Order Opening A Working Case To Consider A New Rule Regarding the Treatment of Customer Information* issued in this docket on July 11, 2018, and states as follows:

1. The Company appreciates the opportunity to comment in this working case. The Company does not have major concerns with the draft language. As written, the draft rule allows the Company to continue to utilize third-parties to provide utility services. The Company supports the language proposed in section 2.A.1, which states that “customer information remains the sole property of the covered utility” which is the Company’s understanding and practice.

2. The Company’s suggests one change regarding customer consent:

a. Section 3(a) permits customer information to be provided to an affiliate or non-affiliate with “written” or “recorded” customer consent. The Company recommends that the word “electronic” be added to this section as this is how consent is obtained from customers who are accessing their accounts on -line.

3. On August 9, 2018 the Commission issued an *Order Extending Comment Period and Expanding Scope of this Working Case*. Interested stakeholders were asked to provide written comments related to expanded protections for utility customers related to the use by utilities of Advanced Meter Infrastructure (AMI) or smart meters. The Company agrees with Staff that a workshop to address these issues is appropriate. The Company will be better positioned to provide specific comments when and if a modified proposed rule is available for review.

WHEREFORE, the Company respectfully requests the Commission consider its comments.

Respectfully submitted,

*/s/ Roger W. Steiner*

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Robert J. Hack, MBN 36496

Lead Regulatory Counsel

Phone: (816) 556-2791

E-mail: [rob.hack@kcpl.com](mailto:rob.hack@kcpl.com)

Roger W. Steiner, MBN 39586

Corporate Counsel

Phone: (816) 556-2314

E-mail: [roger.steiner@kcpl.com](mailto:roger.steiner@kcpl.com)

Kansas City Power & Light Company

1200 Main – 16<sup>th</sup> Floor

Kansas City, Missouri 64105

Fax: (816) 556-2787

**Attorneys for Kansas City Power & Light  
Company and KCP&L Greater Missouri  
Operations Company**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 24<sup>th</sup> day of August, 2018.

*/s/ Roger W. Steiner*

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Roger W. Steiner