

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

In the Matter of the Application of KCP&L)	
Greater Missouri Operations Company for)	Case No. ER-2010-0356
Approval to Make Certain Changes in its)	Consolidated in: EO-2010-0259
Charges for Electric Service.)	

**APPLICATION FOR INTERVENTION
OF NORTH KANSAS CITY HOSPITAL**

North Kansas City Hospital (“NKC” or “Hospital”), retail customer of KCP&L Greater Missouri Operations Company (“GMO” or “Company”) (including retail customers of the former entity, Aquila, Inc.) petitions the Public Service Commission of the State of Missouri (“PSC” or “Commission”) for an order permitting NKC to intervene in this proceeding. If permitted to intervene, NKC’s intervention will be as part of the Hospital Intervenors and it respectfully requests the right of Intervention and full participation permitted under applicable law. In support of its Application to the PSC for Intervention as a member of the Hospital Intervenors, NKC states and alleges the following:

1. The Hospital Intervenors currently consists of the following hospitals:

Lee’s Summit Medical Center
Liberty Hospital
Research Belton Hospital
Saint Luke’s East - Lee’s Summit
St. Mary’s Medical Center
Saint Luke’s Northland Hospital - Smithville Campus

2. North Kansas City Hospital is a Missouri corporation, in good standing in all respects with its principal office and place of business located at 2800 Clay Edwards Drive, North Kansas City, MO 64116-3220. The Company is a public non-profit hospital, created for the benefit of a political subdivision under Chapter 206 of the Revised Statutes of

Missouri. The character of business is to provide hospital and related medical services. Communication and orders of the Commission are to be sent to applicant's legal counsel listed in this Application. There is no pending action, final unsatisfied judgments or decisions against NKC from any state or federal agency or court which involve customer service rates, which action, judgment or decision has occurred within three (3) years of the date of the Application. No annual report or assessment fees are overdue. This Application is verified by counsel for the applicants and counsel verifies that he is so authorized.

3. North Kansas City Hospital, retail customer of GMO, petitions the Public Service Commission of the State of Missouri, for an Order permitting NKC to intervene as a member of the Hospital Intervenors in the above-captioned proceeding. In support of its Application for Intervention to the PSC, NKC and Hospital Intervenors state and allege the following:

2. By its Application dated June 4, 2010 in this Docket, GMO requested approval of the Commission to make changes to its retail electric service charges. The Company proposes increases of these charges of approximately 14.43 percent. The Company further proposes to amend the terms and conditions under which retail electric service is offered to GMO customers. The claimed reasons for the filing include additions to GMO generating capacity, specifically the Iatan II coal fired generation facility, and the Company's share of environmental control equipment associated with Iatan 1 and Iatan Common plant. GMO further cites increased non-fuel operating costs in support of its proposed rate increase.

3. North Kansas City Hospital and Hospital Intervenors are ratepayers in the State of Missouri, and are retail customers of GMO. The provision of reliable supplies of electric energy at reasonable prices, is critical to the business operations of Hospital Intervenors.

4. The Application of GMO, if granted by the PSC, would substantially increase the rates for retail electric energy as charged by GMO to all Hospital Intervenors, and would also change the terms and conditions of service pursuant to which GMO offers retail electric service to Hospital Intervenors.

5. For purposes of 4 CSR 240-2.075(2), Hospital Intervenors state that they are opposed to discriminatory pricing of electricity and related utility services, are opposed to increases that are not reasonable and are not related to prudent costs that are incurred by the utility in providing utility service, and are opposed to a utility being permitted to earn what may be an unreasonably high rate of return. Hospital Intervenors are presently unable to state their position relating to the relief sought by GMO. Hospital Intervenors are continuing to review GMO's filing and reserve the right to take positions on specific issues as this case proceeds.

6. Hospital Intervenors are directly affected by the described Application of GMO and their operations in the State of Missouri may be substantially impacted based on any decision by the Commission with regard to the Application of GMO.

7. No other party to this proceeding adequately represents the interests of North Kansas City Hospital and Hospital Intervenors in this Docket, and granting of the requested intervention to NKC will advance the interests of justice and will in no way impair the prompt consideration and resolution of this Application by the Commission.

8. North Kansas City Hospital's intervention through the Hospital Intervenors will serve the public interest by assisting the record for the Commission's decision in this case.

9. Because of the voluminous nature and complexity of the Application in this Case as well as the need to appropriately consider the effect of the Application on the operation of the numerous hospitals, the present Application for Intervention has been delayed to this time. Counsel for Hospital Intervenors has contacted counsel for the Applicants and represented to the Commission that GMO has no objection to the Intervention of Hospital Intervenors so long as Hospital Intervenors agree to accept the current state of the record and orders issued in this Case prior to this requested Application for Intervention. NKC and Hospital Intervenors state that they accept the state of the record and all orders issued in this case prior to this requested Application for Intervention.

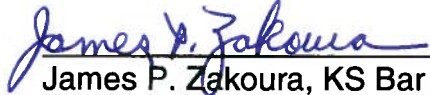
10. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

James P. Zakoura, KS Bar #7644
SMITHYMAN & ZAKOURA, CHARTERED
750 Commerce Plaza II
7400 West 110th Street
Overland Park, KS 66210-2362
Phone: (913) 661-9800
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Neil S. Sader, MO Bar #34375
4739 Belleview Avenue, Suite 300
Kansas City, MO 64112
Phone: (816) 561-1818
Email: nasader@saderlawfirm.com

WHEREFORE, North Kansas City Hospital respectfully requests Intervention, as a member of the Hospital Intervenors, with full rights of participation under applicable Missouri law, in this Proceeding.

Respectfully submitted,



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/s/ Neil S. Sader

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ATTORNEYS FOR HOSPITAL INTERVENORS

VERIFICATION

STATE OF KANSAS)
) SS.
COUNTY OF JOHNSON)

I, James P. Zakoura, being first duly sworn, state that the above and foregoing Application for Intervention is true and accurate to the best of my knowledge, information and belief.


James P. Zakoura

SUBSCRIBED AND SWORN to before me this 30th day of June, 2010.


Notary Public

My Appointment Expires:

08-31-2010

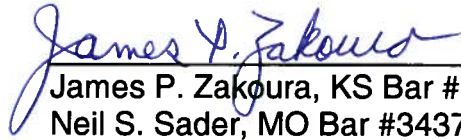


CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 30th day of June, 2010, to:

<p>Nathan Williams Missouri Public Service Commission General Counsel Office PO Box 360 200 Madison Street, Suite 800 Jefferson City, MO 65102 Nathan.Williams@psc.mo.gov GenCounsel@psc.mo.gov</p>	<p>Lewis Mills Office of the Public Counsel PO Box 2230 200 Madison Street, Suite 650 Jefferson City, MO 65102 opcservice@ded.mo.gov</p>
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<p>James M. Fischer Larry W. Dority Kansas City Power & Light Company 101 Madison Street, Suite 400 Jefferson City, MO 65101 jfischerpc@aol.com lwdority@sprintmail.com</p>	<p>William G. Riggins Kansas City Power & Light Company PO Box 418679 Kansas City, MO 64141-9679 bill.riggins@kcpl.com</p>
<p>Karl Zobrist Roger W. Steiner Kansas City Power & Light Company 4520 Main Street, Suite 1100 Kansas City, MO 64111 kzobrist@sonnenschein.com rsteiner@sonnenschein.com</p>	<p>David Woodsmall Sedalia Industrial Energy Users Association 428 E. Capitol Ave., Suite 300 Jefferson City, MO 64101 dwoodsmall@fcplaw.com</p>
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Thomas M. Byrne Union Electric company PO Box 66149 (MC 1310) 1901 Chouteau Avenue St. Louis, MO 63166-6149 AmerenUEService@ameren.com	
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