

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

In the Matter of the Application of)	
Kansas City Power & Light Company)	Case No. ER-2010-0355
to Modify its Tariff to Continue the)	Consolidated in: EO-2010-0259
Implementation of its Regulatory Plan)	

APPLICATION FOR INTERVENTION

Carondelet Health
Crittenton Children's Center
HCA Midwest Health System
North Kansas City Hospital
Research Medical Center
Research Psychiatric Center
Saint Luke's Cancer Institute, L.L.C.
Saint Luke's Health System, Inc.
Saint Luke's Northland Hospital - Barry Road Campus
St. Joseph Medical Center,
Saint Luke's Hospital of Kansas City, and
Truman Medical Center¹,

("Hospital Intervenors"), retail customers of Kansas City Power & Light Company ("KCPL") (including retail customers of the former entity, Aquila, Inc.), petition the Public Service Commission of the State of Missouri ("PSC" or "Commission"), for an Order permitting Hospital Intervenors to intervene in this proceeding. In support of its Application for Intervention to the PSC, Hospital Intervenors state and allege the following:

1. Carondelet Health is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 1000 Carondelet Drive, Kansas City, MO 64114-4673. The Company is engaged in providing hospital and related medical services in portions of Missouri as a not-for-profit health care system under the jurisdiction

¹ Request has been made to the office of the Missouri Secretary of State for a certified copy of the Certificate of Good Standing for Truman Medical Center. The Commission will be provided a copy immediately upon receipt.

of the Commission. There is already on file with the Commission a certified copy of the Company's Certificate of Good Standing (*see*, Commission Case No. ER-2009-0089), and said document is incorporated herein by reference and made a part hereof for all purposes.

2. Crittenton Children's Center is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 10918 Elm Avenue, Kansas City, MO 64134-4108. The Company is engaged in providing hospital and related medical services in portions of Missouri under the jurisdiction of the Commission. There is already on file with the Commission a Registration of the Fictitious Name filed with the Secretary of State (*see*, Commission Case No. ER-2009-0089), and said document is incorporated herein by reference and made a part hereof for all purposes.

3. HCA is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 903 E. 104th Street, 5th Floor, Kansas City, MO 64131-4508. The Company is engaged in providing hospital and related medical services in portions of Missouri and is subject to the jurisdiction of the Commission. There is already on file with the Commission a Registration of the Fictitious Name filed with the Secretary of State (*see*, Commission Case No. ER-2009-0089), and said document is incorporated herein by reference and made a part hereof for all purposes.

4. 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 political subdivision district hospital 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 or final unsatisfied judgments or decisions against North Kansas City Hospital 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.

5. Research Medical Center is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 2316 East Meyer Boulevard, Kansas City, MO 64132-1136. The Company is engaged in providing hospital and related medical services in portions of Missouri and is subject to the jurisdiction of the Commission. There is already on file with the Commission a Registration of the Fictitious Name filed with the Secretary of State (*see*, Commission Case No. ER-2009-0089), and said document is incorporated herein by reference and made a part hereof for all purposes.

6. Research Psychiatric Center is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 2323 E. 63rd St., Kansas City, MO 64130. The Company is engaged in providing hospital and related medical services in portions of Missouri and is subject to the jurisdiction of the Commission. There is already on file with the Commission a Registration of the Fictitious Name filed with the Secretary of State (*see*, Commission Case No. ER-2009-0089), and said document is incorporated herein by reference and made a part hereof for all purposes.

7. Saint Luke's Cancer Institute, L.L.C. is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 4401 Wornall Road, Kansas City, MO 64111-3220. The Company is engaged in providing

hospital and related medical services in portions of Missouri and is subject to the jurisdiction of the Commission. There is already on file with the Commission a certified copy of the Company's Certificate of Good Standing (see, Commission Case No. ER-2009-0089), and said document is incorporated herein by reference and made a part hereof for all purposes.

8. St. Luke's Health System, Inc. is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 4323 Wornall Road, Peet Center, 1st Floor, Kansas City, MO 64111-3214. The Company is engaged in providing hospital and related medical services in portions of Missouri and is subject to the jurisdiction of the Commission. There is already on file with the Commission a certified copy of the Company's Certificate of Good Standing (see, Commission Case No. ER-2009-0089), and said document is incorporated herein by reference and made a part hereof for all purposes.

9. Saint Luke's Northland Hospital - Barry Road Campus is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 5830 Northwest Barry Road, Kansas City MO 64154-2778. The Company is engaged in providing hospital and related medical services in portions of Missouri and is subject to the jurisdiction of the Commission. There is already on file with the Commission a certified copy of the Company's Certificate of Good Standing (see, Commission Case No. ER-2009-0089), and said document is incorporated herein by reference and made a part hereof for all purposes.

10. St. Joseph Medical Center is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 1000 Carondelet Dr.,

Kansas City, MO 64114-4673. The Company is engaged in providing hospital and related medical services in portions of Missouri and is subject to the jurisdiction of the Commission. There is already on file with the Commission a certified copy of the Company's Certificate of Good Standing (*see*, Commission Case No. ER-2009-0089), and said document is incorporated herein by reference and made a part hereof for all purposes.

11. Saint Luke's Hospital of Kansas City is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at P.O. Box 11900, 4401 Wornall Road, Kansas City, MO 64171-9000. The Company is engaged in providing hospital and related medical services in portions of Missouri and is subject to the jurisdiction of the Commission. There is already on file with the Commission a certified copy of the Company's Certificate of Good Standing (*see*, Commission Case No. ER-2009-0089), and said document is incorporated herein by reference and made a part hereof for all purposes.

12. Truman Medical Center is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 2301 Holmes St., Kansas City MO 64108. The Company is engaged in providing hospital and related medical services in portions of Missouri and is subject to the jurisdiction of the Commission. A certified copy of the Company's Certificate of Good Standing has been requested from the Missouri Secretary of State and will be provided to the Commission immediately upon receipt.

13. Hospital Intervenors, retail customers of KCPL, petition the PSC for an Order permitting Hospital Intervenors to intervene in this proceeding. In support of its Application for Intervention to the PSC, Hospital Intervenors state and allege the following:

14. By its Application dated June 4, 2010 in this Docket, KCPL requested approval of the Commission to make changes to its charges for retail electric service by increasing those charges by approximately 13.78 percent, and also to amend the terms and conditions pursuant to which such retail electric service is offered to its customers. The claimed reasons for the filing include additions to rate base and increased costs of operations, especially fuel and purchased power costs.

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

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

17. 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 KCPL. Hospital Intervenors are continuing to review KCPL's filing and reserve the right to take positions on specific issues as this case proceeds.

18. Hospital Intervenors are directly affected by the described Application of KCPL 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 KCPL.

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

20. Hospital Intervenors' intervention will serve the public interest by assisting the record for the Commission's decision in this case.

21. 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 KCPL 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. 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.

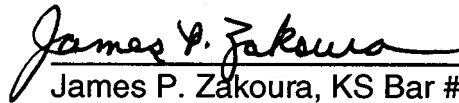
22. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

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
Fax: (913) 661-9863
Email: jim@smizak-law.com

Neil S. Sader, MO Bar #34375
4739 Belleview Avenue, Suite 300
Kansas City, MO 64112
Phone: (816) 561-1818
Email: nsader@saderlawfirm.com

WHEREFORE, Hospital Intervenors respectfully request the Commission issue its order granting their Application for Intervention and that it be made a party with all rights to participate in this matter.

Respectfully submitted,



James P. Zakoura, KS Bar #7644
SMITHYMAN & ZAKOURA, CHARTERED
750 Commerce Plaza II
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Phone:(913) 661-9800 / Fax: (913) 661-9863
E-Mail: jim@smizak-law.com

/s/ Neil S. Sader

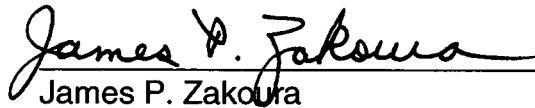
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ATTORNEYS FOR HOSPITAL INTERVENORS
CARONDELET HEALTH
CRITTENTON CHILDREN'S CENTER
HCA MIDWEST HEALTH SYSTEM
NORTH KANSAS CITY HOSPITAL
RESEARCH MEDICAL CENTER
RESEARCH PSYCHIATRIC CENTER
SAINT LUKE'S CANCER INSTITUTE, L.L.C.
SAINT LUKE'S HEALTH SYSTEM, INC.
ST. JOSEPH MEDICAL CENTER
SAINT LUKE'S HOSPITAL OF KANSAS CITY
TRUMAN MEDICAL CENTER

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

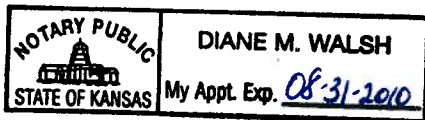
SUBSCRIBED AND SWORN to before me this 29th day of JUNE, 2010.



Notary Public

My Appointment Expires:

08-31-2010

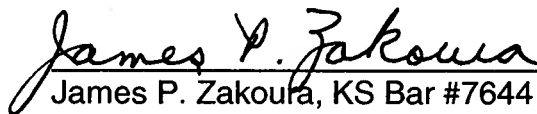


CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 29th 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>
<p>Mark W. Comley City of Kansas City, Missouri PO Box 537 601 Monroe Street, Suite 301 Jefferson City, MO 65102-0537 comleym@ncrpc.com</p>	<p>Jeremiah D. Finnegan County of Jackson, Missouri 3100 Broadway, Suite 1209 Kansas City, MO 64111 jfinnegan@fcplaw.com</p>
<p>Dean L. Cooper Diana C. Carter James C. Swearngen Russell L. Mitten The Empire District Electric Company PO Box 456 312 East Capitol Jefferson City, MO 64102 dcooper@brydonlaw.com DCarter@brydonlaw.com Lrackers@brydonlaw.com rmitten@brydonlaw.com</p>	<p>Diana M. Vuylsteke Ford Motor Company 211 N. Broadway, Suite 3600 St. Louis, MO 63102 dmvuylsteke@bryancave.com</p>
<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>Shelley A. Woods Sarah B. Mangelsdorf Missouri Dept. of Natural Resources PO Box 899 Jefferson City, MO 65102-0899 shelley.woods@ago.mo.gov sarah.mangelsdorf@ago.mo.gov</p>

<p>Mary Ann Young Missouri Dept. of Natural Resources PO Box 176 1101 Riverside Drive, 4th Floor East, Rm. 456 Jefferson City, MO 65102-0176 maryann.young@dnr.mo.gov</p>	<p>Edward F. Downey Diana M. Vuylsteke Missouri Industrial Energy Consumers 221 Bolivar Street, Suite 101 Jefferson City, MO 65101 efdowney@bryancave.com dmvuylsteke@bryancave.com</p>
<p>Douglas Healy Missouri Joint Municipal Electric Utility Commission 939 Boonville, Suite A Springfield, MO 65802 doug@healylawoffices.com</p>	<p>Duncan E. Kincheloe Missouri Joint Municipal Electric Utility Commission 1808 I-70 Dr. SW Columbia, MO 65203 dkincheloe@mpua.org</p>
<p>David Woodsmall Praxair, Inc. 428 E. Capitol Ave., Suite 300 Jefferson City, MO 65101 dwoodsmall@fcplaw.com</p>	<p>Stuart Conrad Praxair, Inc. 3100 Broadway, Suite 1209 Kansas City, MO 64111 stucon@fcplaw.com</p>


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