

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

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| 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

- A. Lee's Summit Medical Center
- B. New Liberty Hospital District
- C. Research Belton Hospital
- D. Saint Luke's East - Lee's Summit,
- E. St. Mary's Medical Center,¹ and
- F. Saint Luke's Northland Hospital - Smithville Campus²

("Hospital Intervenors"), retail customers of KCP&L Greater Missouri Operations Company ("GMO" or "Company") (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:

A. Lee's Summit Medical Center is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 2100 SE Blue Parkway, Lee's Summit, MO 64063-1007. 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

¹ The Applicants listed in A through E, are referred to, collectively, as "Hospital Intervenors".

² In the Application for Intervention filed on January 8, 2009, Saint Luke's Northland Hospital - Smithville Campus was listed as an entity that sought intervention. Saint Luke's Northland Hospital - Smithville made a Registration of Fictitious Name" on November 8, 1993. However, on April 13, 2005, a Cancellation of Registration of Fictitious Name" was filed by Saint Luke's Northland Hospital of Smithville. Counsel will submit the required information when it becomes available.

Name filed with the Secretary of State (*see*, Commission Case No. ER-2009-0090), and said document is incorporated herein by reference and made a part hereof for all purposes.

B. New Liberty Hospital District is a political subdivision of the state of Missouri with its principal office and place of business located at P.O. Box 1002, 2525 Glenn Hendren Drive, Liberty, MO 64069-1002. New Liberty Hospital District is a public 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 Missouri Public Service 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 New Liberty Hospital District from any state or federal agency or court which involve customer service or 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.

C. Research Belton Hospital is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 17065 South U.S. Highway 71, Belton, MO 64012-4631. 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-2009-0090), and said document is incorporated herein by reference and made a part hereof for all purposes.

D. St. Luke's East - Lee's Summit is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 100 N.E. Saint

Luke's Boulevard, Lee's Summit, MO 64086-6000. 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-2009-0090), and said document is incorporated herein by reference and made a part hereof for all purposes.

E. St. Mary's Medical Center, is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 201 Northwest R D Mize Road, Blue Springs, MO 64014-2513. 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-2009-0090), and said document is incorporated herein by reference and made a part hereof for all purposes.

1. Hospital Intervenors, retail customers of GMO (including retail customers of the former entity, Aquila, Inc.) petition the Public Service Commission of the State of Missouri, for an Order permitting the Hospital Intervenors to intervene in the above-captioned proceeding. In support of its Application for Intervention to the PSC, 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 latan II coal fired generation facility, and the Company's share of environmental control equipment associated with latan 1 and latan Common plant. GMO further cites increased non-fuel operating costs in support of its proposed rate increase.

3. 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 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 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.

8. Hospital Intervenors' intervention 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. 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.

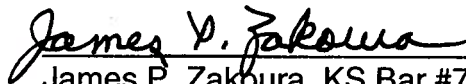
10. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

James P. Zakoura, KS Bar #7644
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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,



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ATTORNEYS FOR HOSPITAL INTERVENORS
LEE'S SUMMIT MEDICAL CENTER
NEW LIBERTY HOSPITAL DISTRICT
RESEARCH BELTON HOSPITAL
SAINT LUKE'S EAST - LEE'S SUMMIT
ST. MARY'S MEDICAL CENTER
ST. LUKE'S NORTHLAND HOSPITAL - SMITHVILLE CAMPUS

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:

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| <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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