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

In the Matter of the Application of KCP&L	)	
Greater Missouri Operations Company for Approval	)	Case No. ER-2009-0090
to Make Certain Changes in its Charges for Electric	)	
Service	)	

## HOSPITAL INTERVENORS STATEMENT OF POSITION

COMES NOW Hospital Intervenors, by and through counsel, and submits this statement of position on the list of issues filed by the parties in this case on April 14, 2009:

Rate Base 1.c.

ISSUE 1.c.: Should the costs of the latan 1 AQCS Rate Base Additions that exceed KCPL's "definitive estimate" before allocation be allocated and included in L&P's rate base on an interim subject to refund basis?

Hospital Intervenors position: No. The KCPL Regulatory Plan provides in paragraph III.B.1.q.: "KCPL must develop and have a cost control system in place that identifies and explains any cost overruns above the definitive estimate during the construction period of the latan 2 project, the wind generation projects and the environmental investments." A definitive estimate is a bottom-up estimate, and the most accurate of estimate types.

Hospital Intervenors take no position on the other issues set out by the parties, without impairment of its right to brief and argue those issues to the Commission as the evidence may unfold at hearing.

## Respectfully submitted,

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ST. MARY'S MEDICAL CENTER

## **Certificate of Service**

I hereby certify that a true and correct copy of the above and foregoing document was sent via email on this 16<sup>th</sup> day of April, 2009, to all parties of record.

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