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

In the Matter of the Application of Kansas City	)	
Power and Light Company for Approval to Make	)	Case No. ER-2009-0089
Certain Changes in its Charges for Electric	)	Tariff No. JE-2009-0192
Service to Continue the Implementation of its	)	
Regulatory Plan	Ś	

## 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 in this case on April 13, 1009 by Kansas City Power & Light company ("KCPL"):

## Rate Base Additions.

ISSUE 1.f.: Should the cost of latan 1 Rate Base Additions that exceed KCPL's "definite estimate" be included in the rate base on an interim subject to refund basis?

James R. Dittmer filed Testimony on behalf of the Hospital Intervenors that sets forth the "definite estimate" of KCPL, provided by KCPL at the time the Comprehensive Energy Plan ("CEP") was approved by this Commission for KCPL. Mr. Dittmer's Testimony sets forth the material amount that the costs of KCPL have exceeded the "definite estimate." The Commission must make a legal determination as to whether the Commission under applicable law is required to include costs in rate base of KCPL that materially exceed this "definite estimate".

The 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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RESEARCH MEDICAL CENTER

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SAINT LUKE'S HEALTH SYSTEM, INC.

ST. JOSEPH MEDICAL CENTER

SAINT LUKE'S HOSPITAL OF KANSAS CITY

## **Certificate of Service**

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 15th day of April, 2009, to all parties of record.

Constance L. Shidler, KS Bar #38402

ATTORNEYS FOR HOSPITAL INTERVENERS