

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

In the Matter of the Application of Trigen-)	
Kansas City Energy Corporation for a)	
Certificate of Public Convenience and)	
Necessity Authorizing It to Construct, Install,)	
Own, Operate, Control, Manage and Maintain)	Case No. HA-2006-0294
a Steam Heat Distribution System to Provide)	
Steam Heat Service in Kansas City, Missouri)	
as an Expansion of Its Existing Certified Area.)	

**RESPONSE IN OPPOSITION TO
MGE’S REQUEST FOR EXTENSION
OF FILING DEADLINES**

COMES NOW Truman Medical Center, Incorporated, (TMC) by and through its undersigned counsel and for its Response in Opposition to MGE’s Request for Extension of Filing Deadlines, states:

1. TMC hereby adopts and incorporates by reference the response of Trigen-Kansas City Energy Corporation’s Response in Opposition to MGE’s Request for Extension of Filing Deadlines previously filed.
2. Additionally, TMC reinforces the fact that time is critically important to the approval of Trigen’s application for TMC.
3. Trigen’s steam service offers TMC a significant utility cost savings that is forever lost each day Trigen’s application goes unapproved.
4. Such utility cost savings go directly to TMC’s effort to deliver state of the art healthcare to the citizens of Kansas City, Missouri and Jackson County, Missouri regardless of ability to pay.

5. Any delay or extensions of this proceeding that undercut the approval of this application has a direct impact on TMC's ability to financially deliver care to those in TMC's catchment area who are the least able to access such care.

6. To TMC, the cost savings opportunity the Trigen application presents goes far beyond steam energy and utilities to the very heart of TMC's mission to its patient population.

WHEREFORE, Truman Medical Center, Incorporated respectfully opposes MGE's Request for Extension of Filing Deadlines as set forth here and requests that the Commission deny MGE's request and strike any and all testimony filed after the already ordered rebuttal testimony deadline.

Respectfully submitted,

TRUMAN MEDICAL CENTER, INCORPORATED

/s/ G. David Porter

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ATTORNEY FOR TRUMAN MEDICAL CENTER

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was sent to counsel for all parties of record in Case No. HA-2006-0294 by depositing same in the U.S. Mail, first class postage prepaid, by hand-delivery, or by electronic transmission this 12th day of April, 2006.

/s/ G. David Porter

G. David Porter