

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of Veolia Energy Kansas City, Inc.     )  
For Authority to File Tariffs to Increase Rates.     )     Case No. HR-2014-0066

**TRUMAN MEDICAL CENTER PETITION TO INTERVENE**

COMES NOW, Truman Medical Center (“TMC”) pursuant to 4 CSR 240-2.075(10), and for its application to intervene in the above-captioned proceeding, respectfully states as follows to the Missouri Public Service Commission (“MPSC” or “Commission”).

1. TMC is duly incorporated under the laws of the State of Missouri with its principal office at 2301 Holmes Street, Kansas City, MO 64108.

2. On November 27, 2013, Veolia Energy Kansas City, Inc. (“Veolia”) filed with the Commission proposed revised tariff sheets intended to implement a general rate increase.

3. In its December 3, 2013 *Order Suspending Tariff, Scheduling Pre-Hearing Conference, Directing Notice, and Setting Deadline for Intervenors*, the Commission directed interested parties to file motions for intervention by December 24, 2013. TMC hereby respectfully requests that it be permitted to intervene out of time pursuant to 4 CSR 240-2.075(10).

4. TMC is a two-hospital, not-for-profit health system located in and serving Kansas City, Missouri. TMC’s downtown location, TMC Hospital Hill, is the largest provider of outpatient specialty care in Kansas City, operates the busiest adult emergency department in the city, and has one of the top Level 1 trauma centers in the Kansas City metropolitan area. TMC’s suburban hospital, TMC Lakewood, is located near Lee’s Summit Missouri, and provides a range of specialty and outpatient services. TMC is the largest provider of uncompensated care in the

State of Missouri, with more than \$130 million in such care provided in the last fiscal year. Over 108,000 patients are cared for at TMC each year, making up more than 20,000 admissions, 330,000 outpatient visits and 100,000 emergency department visits.

5. TMC is a current customer of Veolia under the Large Commercial Service (“LCS”) tariff. TMC’s average monthly steam consumption for its hospitals and for the care and comfort of the patients it serves is approximately \$150,000. TMC is still in the process of reviewing Veolia’s request for a rate increase in detail and, as such, cannot yet state precisely what its position will be in this matter. However, in light of the over 14% rate increase requested by Veolia, it appears that TMC will be directly impacted by any rate changes that may be ordered in this case. Notice of this proceeding was provided to TMC via a general letter that contained no details of the potential rate impacts to Veolia customers in general or specifically to TMC.

6. At this time, it appears that the City of Kansas City, Missouri, and Missouri Gas Energy have petitioned for intervention in this proceeding. TMC submits that it should be permitted to intervene in this proceeding because it has an interest that is different from that of the general public that may be adversely affected by a final order in this case and because granting intervention to TMC would serve the public interest. Neither the general public, nor any other intervenor in this docket, can adequately protect TMC’s interests in this proceeding.

7. TMC asserts that, consistent with 4 CSR 240-2.075(10), good cause exists for allowing it to intervene subsequent to the December 24, 2013 deadline for interventions imposed by the Commission. TMC submits that its intervention will provide a valuable perspective for the Commission and the parties on the issues raised in this docket. TMC further asserts that because the Commission’s Order Setting Procedural Schedule was recently issued on January 16,

2014, TMC's request for intervention will neither prejudice any other party nor disrupt the established schedule.

8. If this Petition is granted, pursuant to 4 CSR 240-2.075(10), TMC agrees to accept the record as it currently stands in this proceeding, including the requirements of any orders of the Commission, as of the date this Petition has been filed.

WHEREFORE, TMC respectfully petitions the Commission for intervention in the above-captioned matter, and requests that all pleadings, correspondence, discovery, and other documents be served on the following individuals:

William H. Colby  
Truman Medical Centers  
2301 Holmes Street  
Kansas City, MO 64108  
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Respectfully submitted,



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(816) 572-4754

ATTORNEYS FOR TRUMAN MEDICAL  
CENTER

**VERIFICATION**

STATE OF MISSOURI            )  
  ) SS  
COUNTY OF JACKSON        )

I, Anne E. Callenbach, being first duly sworn, do hereby certify, depose and state that I am the attorney for Truman Medical Center, which seeks intervention in the above captioned proceeding before the Missouri Public Service Commission; that I have read the above and foregoing Application to Intervene and the allegations therein contained are true and correct to the best of my knowledge, information and belief; and I further state that I am authorized to verify the foregoing Application by the above said applicant to intervene.

  
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Anne E. Callenbach

Subscribed and sworn to before me, a Notary Public this 3<sup>rd</sup> day of February, 2014.

  
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Notary Public



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent via email on this 3rd day of February, 2014, to all parties.