BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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| In the Matter of Veolia Energy | |
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| Kansas City, Inc. for Authority | |
| to File Tariffs to Increase Rates | |

Case No. HR-2014-0066

VEOLIA'S MOTION TO DELAY CONSIDERATION OF TRUMAN MEDICAL CENTER'S LATE-FILED PETITION TO INTERVENE

COMES NOW, Veolia Energy Kansas City, Inc. ("Veolia") and in response to the Petition to Intervene Out of Time filed by Truman Medical Center ("TMC"), states as follows:

1. On December 3, 2013, the Commission issued its Order Suspending Tariff, Scheduling Pre-Hearing Conference, Directing Notice, and Setting Deadline for Intervenors. This order established a deadline of December 24, 2013 for motions to intervene.

2. On February 3, 2014, TMC filed a petition to intervene out of time.

3. TMC's petition alleges in paragraph 3 that "[n]otice 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 the PSC."

4. Contrary to TMC's allegation, Veolia informed TMC of the rate case on August 29, 2013, several months before the rate case was filed. Veolia's Vice President and General Manager Charles Melcher met personally with Steve DeGarmo, TMC's Director of Facilities and management and conveyed key aspects of Veolia's rate proposal to him, including the amount and expected timing of Veolia's planned rate filing. In that meeting, Mr. Melcher informed TMC that the rate application was expected to increase the district steam rates by about 20%. As shown by Schedule CMP-2 appended to Mr. Melcher's direct testimony in this proceeding, Veolia's proposed overall rate increase and the proposed increase to the customer class under which TMC receives steam service is 14.4% -- or only 72% of the estimated increase originally communicated to TMC.

5. Veolia has reason to believe that TMC may possibly have been provided confidential Veolia documents by a former Veolia employee and that the former employee may have acted improperly in disclosing those documents to TMC. Additionally, Veolia is in the process of evaluating concerns regarding a possible conflict of interest regarding counsel. A brief extension of time would allow Veolia an opportunity to address those concerns, which are material to its position regarding TMC's intervention.

6. Veolia intends to continue informal discussions with TMC and its counsel regarding this matter.

7. Veolia respectfully requests that the Commission refrain from ruling on TMC's motion to intervene out of time so that it can evaluate facts crucial to its position and will continue to engage in discussions with TMC and its counsel.

8. TMC's motion to intervene stated that the granting of its "request for intervention will neither prejudice any other party nor disrupt the established schedule." Veolia similarly states that its request for the Commission to refrain from ruling on TMC's motion to intervene out of time will not prejudice any party nor disrupt the procedural schedule.

WHEREFORE, based on the foregoing, Veolia respectfully requests that the Commission refrain until February 24, 2014, from ruling on TMC's petition to intervene out of time.

Respectfully submitted,

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Attorney for Veolia Energy Kansas City, Inc.

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 13th day of February, 2014, to all parties on the Commission's service list in this case.

/s/ Diana Vuylsteke