

Exhibit No.:  
Issue: 2002 Annual Report Submission  
Witness: Helen V. Thompson  
Sponsoring Party: Heartland Health Systems, Inc.  
Type of Exhibit: Rebuttal Testimony  
Case No.: TC-2004-0390  
Date Testimony Prepared: April 22, 2004

**MISSOURI PUBLIC SERVICE COMMISSION**

**UTILITY SERVICES DIVISION**

**REBUTTAL TESTIMONY**

**OF**

**HELEN V. THOMPSON**

**HEARTLAND HEALTH SYSTEMS, INC.**

**CASE NO. TC-2004-0390**

**FILED<sup>3</sup>**

**APR 26 2004**

**Missouri Public  
Service Commission**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

The Staff of the Missouri  
Public Service Commission,

Petitioner,

v.

Heartland Health System, Inc.,

Respondent.

Case No. TC-2004-0390


**AFFIDAVIT OF HELEN THOMPSON**

STATE OF MISSOURI

COUNTY OF BUCHANAN


ss.

Helen Thompson, being of lawful age, on her oath states: that she has participated in the preparation of the following Rebuttal Testimony in question and answer form, consisting of 2 pages to be presented in the above case; that the answers in the following Rebuttal Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of her knowledge and belief.

  
Helen Thompson

SUBSCRIBED AND SWORN to before me this 20th day of April, 2004.



  
Notary Public

My Commission Expires:  
1/7/06

**REBUTTAL TESTIMONY**  
**OF**  
**HELEN V. THOMPSON**  
**HEARTLAND HEALTH SYSTEMS, INC.**  
**CASE NO. TC-2004-0390**

Q. Please state your name and business address.

A. Helen V. Thompson, 5325 Faraon Street, St. Joseph, Missouri 64506.

Q. By whom are you employed and in what capacity?

A. I am the Chief Information Officer (CIO) with Heartland Health.

Q. Have you previously filed testimony before this Commission?

A. No.

Q. What is the purpose of your testimony in this case?

A. The purpose of my testimony is to document the compliance of Heartland Health Systems, Inc. (Heartland) with the Commission Rule 4 CSR 240-3.540(1) that requires all telecommunications companies to file an annual report on or before April 15 of each year. Heartland was required to submit its 2002 annual report on or before April 15, 2003 and did submit its 2002 annual report to the Commission by mail in April, 2003.

Q. So it is your testimony that Heartland did timely file its 2002 annual report?

A. Yes. Heartland timely filed its 2002 annual report by mail in April 2003.

Q. Did Heartland ever receive any notice from the Commission that its 2002 annual report was not received?

A. No. Heartland did not receive any notification that its 2002 annual report was not received by the Commission until February 2004 when it received a Notice of Complaint filed in this action.

1 Q. So the first and only notice Heartland received that the Commission was not in  
2 receipt of Heartland's 2002 annual report was the Complaint in this action?

3 A. Yes. That is correct.

4 Q. If you had received notice from the Commission that they had not received  
5 Heartland's 2002 annual report, what would you have done?

6 A. We would have immediately re-filed our 2002 annual report.

7 Q. Did Heartland subsequently re-file its 2002 annual report?

8 A. Yes. Upon receipt of the Notice of Complaint in this action, Heartland re-filed its  
9 2002 annual report on March 4, 2004.

10 Q. Do you disagree with the Commission's claim it never received Heartland's 2002  
11 annual report?

12 A. I don't know whether the Commission received Heartland's 2002 annual report or  
13 not. All I know is that Heartland timely mailed its 2002 annual report before the deadline for  
14 filing in April 2003. The annual report should have been timely filed by the Commission.

15 Q. Does this conclude your rebuttal testimony?

16 A. Yes.

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The Staff of the Missouri Public Service  
Commission,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I caused an original and eight copies of Rebuttal Testimony of Helen V. Thompson to be mailed by first-class mail, postage prepaid this 21<sup>st</sup> day of April, 2004, to: Public Service Commission of the State of Missouri, 200 Madison, Jefferson City, MO 65101; and a true and correct copy of the same to be served by first-class mail, postage prepaid this 21<sup>st</sup> day of April, 2004, to: Bruce H. Bates, Attorney for the Staff of the Missouri Public Service Commission, P.O. Box 360, Jefferson City, MO 65102, Attorney for Complainant.

SHUGHART THOMSON & KILROY  
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By 

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