

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

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for Approval) **Case No. ER-2009-0090**
to Make Certain Changes in its Charges for Electric)
Service)

**HOSPITAL INTERVENORS
SUPPLEMENTAL STATEMENT OF POSITION**

COMES NOW:

Bothwell Regional Health Center
Community Hospital Association, Inc.
Lee's Summit Medical Center
Liberty Hospital
Research Belton Hospital
Royal Oaks Hospital
St. Francis Hospital and Health Services
Saint Luke's East - Lee's Summit, and
St. Mary's Medical Center,

(collectively referred to as "Hospital Intervenors"), by and through the undersigned counsel, and submits this Supplemental Statement of Position¹ on the issues set forth below pursuant to the procedural schedule established herein. This Supplemental Statement of Position will use the description of the issues as set forth in the list of Issues filed herein by Staff on April 13, 2009. Although this Supplemental Statement of Position addresses only a limited number of the issues set forth in Staff's List of Issues, the Hospital Intervenors reserve the right to cross-examine witnesses, present argument and submit post-hearing brief(s) as to any issues it deems necessary if the need arises at a later date.

¹

The initial Hospital Intervenors Statement of Position was filed on April 16, 2009.

RATE BASE

1. Iatan 1 Selective Catalytic Reduction ("SCR") facility, Flue Gas Desulphurization ("FGD") unit and Baghouse (collectively "Iatan 1 AQCS-Air Quality Control Systems-Rate Base Additions"):

- a. What criteria should the Commission use to determine when the Iatan 1 AQCS Rate Base Additions are "fully operational and used for service?"

Position: In establishing in-service criteria for any generation asset, the Commission should consider the criteria to be used for commercial acceptance. By aligning acceptance for regulatory and commercial purposes, the Commission can avoid the situation where ratepayers are forced to pay a return on and of investment for a unit that does not operate as contractually designed.

- b. Are the Iatan 1 AQCS Rate Base Additions fully operational and used for service?

Position: No.

- c. Should the costs of the Iatan 1 AQCS Rate Base Additions that exceed KCPL's "definitive estimate" of \$376.8 million before allocation be allocated and included in L&P's rate base on an interim subject to refund basis?

Position: No. No amounts in excess of the "Definite Estimate" of the costs, as presented in 2005, should be included in Rate Case, until following a Commission investigation as to why the "Definite Estimate" was exceeded in a material amount.

- d. Should a regulatory asset be established to defer carrying cost and depreciation expense associated with the Iatan 1 AQCS Rate Base Additions appropriately recorded to Electric Plant in Service that are not included in L&P's rate base in the current rate case.

Position: No. The Hospital Intervenors oppose any special accounting treatment for capital assets that are not included in rate base in the immediate case.

2. Iatan Common Costs (L&P only):


- a. What portion of the Common Costs of the Iatan 1 and Iatan 2 construction projects should be included in L&P's rate base in this proceeding?

Position: Hospital Intervenors restate their Statement of 1.c. above.

- b. Should a regulatory asset be established to defer carrying cost and depreciation expense associated with the portion of the Common Costs of the latan 1 and latan 2 construction projects appropriately recorded to Electric Plant in Service that are not included in L&P's rate base in the current rate case, or should these costs be considered latan 2 project costs?

Position: The Hospital Intervenors take no position on the remaining issues but the Hospital Intervenors reserve the right to cross-examine witnesses, present argument and submit post-hearing brief(s) as to any issues it deems necessary if the need arises at a later date.

Respectfully submitted,



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ATTORNEYS FOR HOSPITAL INTERVENORS

BOTHWELL REGIONAL HEALTH CENTER

COMMUNITY HOSPITAL ASSOCIATION, INC.

LEE'S SUMMIT MEDICAL CENTER

LIBERTY HOSPITAL

RESEARCH BELTON HOSPITAL

ROYAL OAKS HOSPITAL

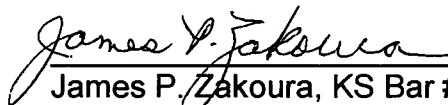
ST. FRANCIS HOSPITAL AND HEALTH SERVICES

SAINT LUKE'S EAST - LEE'S SUMMIT, AND

ST. MARY'S MEDICAL CENTER

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via email on this 22nd day of April, 2009, to all parties of record.



James P. Zakoura, KS Bar #7644

Constance L. Shidler, KS Bar #18402

ATTORNEYS FOR HOSPITAL INTERVENORS