BEFORE THE PUBLIC SERVICE COMMISSION OF STATE OF MISSOURI

In the Matter of the Joint Application of AIP)
Project Franklin Bidco., Inc., Veolia Energy North) Case No. HM-2020-0039
America Holdings, Inc., Thermal North America,)
Inc., Veolia Energy Missouri, Inc., and Veolia)
Energy Kansas City, Inc. for Approval of Indirect)
Merger by Stock Acquisition and Related)
Encumbrance.	

APPLICATION TO INTERVENE OF TRUMAN MEDICAL CENTERS

Truman Medical Center, Inc. d/b/a Truman Medical Centers ("TMC"), pursuant to 4 CSR 240-2.075 and the Commission's procedural order of August 16, 2019, applies to intervene and become a party to this proceeding. In support of its Application, TMC states:

- 1. TMC is a Missouri non-profit corporation with its principal place of business located at 2301 Holmes, Kansas City, Missouri 64108.
- 2. TMC is the largest not-for-profit healthcare system and safety-net healthcare provider in Jackson County and Kansas City, Missouri. For fiscal year 2018, TMC employed 3,086 people and served 69,386 individual patients. TMC also educates more than 1,000 students each year by serving as the primary teaching hospital for the University of Missouri-Kansas City Schools of Medicine, Nursing, Dentistry, and Pharmacy.
- 3. TMC is a major district steam service customer of Veolia Energy Kansas City, Inc. ("VEKC") in Kansas City. TMC and VEKC, formerly known as Trigen-Kansas City Energy Corporation, are also parties to a Customer Advance in Aid of Pipeline Construction and Interconnection Agreement that relates to the steam service that VEKC provides and TMC takes under tariffs approved by this Commission.

4. Given TMC's unique position in the Kansas City community and its interest in evaluating whether the transaction proposed in the Joint Application to sell VEKC and all of its North American affiliates to a European investor who will not do business in the United States is not detrimental to the public interest, TMC must be able to represent its own interests regarding the Joint Application and the issues in this proceeding that affect it. Because TMC's interest in this proceeding is different than the general public and cannot be adequately represented by any other party, it will aid the Commission and serve the public interest if TMC is permitted to intervene to protect its interests.

5. Correspondence or communications regarding this application, including service of all notices and orders of the Commission, should be addressed to:

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6. TMC is still reviewing the Joint Application and does not yet have a position on the issues in this case.

WHEREFORE, TMC requests that the Commission grant its Application to Intervene in this proceeding.

/s/ Karl Zobrist

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Certificate of Service

I hereby certify that a true and correct copy of the foregoing was e-mailed on this 27th day of August 2019, to the persons on the Commission's service list in this case.

/s/ Jacqueline Whipple
Attorney for Truman Medical Center, Inc.
d/b/a Truman Medical Centers