

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of KCP&L Greater Missouri)
Operations Company's Request for Authority) File No. ER-2018-0146
To Implement a General Rate Increase for)
Electric Service)

DOGWOOD ENERGY, LLC'S MOTION TO INTERVENE

COMES NOW Dogwood Energy, LLC ("Dogwood") and respectfully submits its Motion to Intervene in this proceeding pursuant to 4 CSR 240-2.075. In support of its Motion, Dogwood states as follows:

1. Dogwood is a limited liability company organized and existing under the laws of the State of Delaware and authorized to conduct business in the State of Missouri. Dogwood owns the 650 MW combined cycle generating facility located in Pleasant Hill, Missouri, which is within the service territory of KCP&L Greater Missouri Operations Company ("GMO").

2. All communications and pleadings in this case should be directed to:

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3. On January 30, 2018, GMO filed tariffs for the purpose of making changes to its charges for electric service.

4. On February 8, 2018, the Commission sent Notice of Hearing, Order Directing Notice, Setting Conference Date, establishing Intervention Date, and Directing Filings. The Commission set an intervention deadline of February 20, 2018.

5. Dogwood seeks to intervene in this proceeding because the Commission's decision could adversely affect Dogwood's interests as a GMO customer and supplier of wholesale power, which are different than the interests of the general public. Dogwood takes no position at this time on GMO's tariffs pending further investigation.

6. Granting Dogwood's Motion to Intervene will also be in the public interest because Dogwood will bring to this proceeding its expertise in the issues being considered and its experience as a wholesale electric power provider.

WHEREFORE, Dogwood respectfully requests that the Commission grant this Motion to Intervene together with any further and/or additional relief the Commission deems just and proper.

Respectfully submitted,

CURTIS, HEINZ,
GARRETT & O'KEEFE, P.C.

/s/Carl J. Lumley

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Attorneys for Dogwood Energy, LLC

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was emailed, faxed or mailed by U.S. Mail, postage paid, this 12th day of February 2018, to the persons shown on the attached list.

/s/Carl J. Lumley

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