

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Resource Plan of)
KCP&L Greater Missouri Operations) File No. EO-2015-0252
Company.)

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 is the majority owner of the 650 MW combined cycle generating facility located in Pleasant Hill, Missouri, which is within the MPS 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 April 1, 2015 GMO filed its 2015 Integrated Resource Plan, which is required by the Commission's Electric Utility Resource Planning rule, 4 CSR 240-22.

4. On April 3, 2015 the Commission issued its Order Directing Notice and Setting Date for Submission of Intervention Requests. Said order established an intervention date of April 20, 2015.

5. Dogwood seeks to intervene in this proceeding because the Commission's decision could affect Dogwood's interests. Dogwood must ensure robust access to both transmission and power supplies in the region that includes GMO's service territory. Dogwood has been an active participant in recent cases involving GMO, including its preceding IRP cases. Dogwood takes no position at this time pending further investigation and understanding of GMO's proposed IRP.

5. Granting Dogwood's Motion to Intervene will also be in the public interest because Dogwood will bring to this proceeding its expertise in the areas being investigated 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 _____ day of April, 2015, to the persons shown on the attached list.

/s/ Carl J. Lumley

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