

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of KCP&L Greater Missouri)
Operations Company's Request for Authority to) File No. ER-2012-0175
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 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 February 27, 2012 the KCP&L Greater Missouri Operations Company ("GMO" or "Company") filed its Application for the purpose of making changes to GMO's charges for electric service.

4. On February 28, 2012 the Commission issued its Order Providing Notice and Establishing an Intervention Deadline. The order established an intervention date of March 19, 2012.

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, which are different than the interests of the general public. Dogwood is unsure and takes no position at this time on GMO's request 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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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was emailed, faxed or mailed by U.S. Mail, postage paid, this 6th day of March 2012, to the persons shown on the attached list.

/s/ Carl J. Lumley

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