

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of)
KCP&L Greater Missouri Operations) File No. ER-2010-0356
Company for Approval to Make Certain)
Changes in its Charges for Electric)
Service.)

DOGWOOD ENERGY, LLC’S POSITION STATEMENT

COMES NOW Dogwood Energy, LLC (“Dogwood”) and for its Position Statement states to the Commission:

1. Dogwood does not take a position on every issue in this case. Further, at this time there is not a final statement of the issues.
2. Additionally no definitive witness schedule as been agreed upon by the parties. Dogwood witnesses Janssen and Rose will need to testify regarding the issues set forth herein.
3. Dogwood’s Position Statement is as follows:

Prudence of MPS Generating Capacity Additions (Staff Issue No. 78)(GMO ISSUE IV.1):

The Commission should not allow GMO to include the Crossroads generation facility in ratebase and operating expenses. In addition to the adjustments identified by Staff, the Commission should consider the real power and asset sales offers made by Dogwood to GMO as it determines the appropriate ratebase and expense amounts for this aspect of the Company’s power generation portfolio. GMO could use the existing Dogwood generating plant which is located in the Company’s Missouri service area. It is more economical and more reliable than the distant Crossroads facility in Mississippi. (See Janssen Rebuttal and Surrebuttal, Rose Surrebuttal).

CURTIS, HEINZ,
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Certificate of Service

A true and correct copy of the foregoing was served upon the parties identified on the attached service list on this 12th day of January, 2011, by either placing same in the U.S. Mail, postage paid, by fax or email transmission.

/s/ Carl J. Lumley

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