

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

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| In the Matter of the Third Prudence |) | |
| Review of Costs Subject to the |) | File No. EO-2011-0390 |
| Commission-Approved Fuel Adjustment |) | |
| Clause of KCP&L Greater Missouri |) | |
| Operations Company. |) | |

DOGWOOD ENERGY, LLC'S APPLICATION TO INTERVENE

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

Carl J. Lumley
Curtis, Heinz, Garrett & O'Keefe, P.C.
130 S. Bemiston, Suite 200
Clayton, Missouri 63105
(314) 725-8788
(314) 725-8789 (Fax)
clumley@lawfirmemail.com

3. On June 9, 2011, Staff of the Missouri Public Service Commission filed its Notice of Start of Third Prudence Audit indicating that it plans to conduct a prudence review of the costs and revenues associated with GMO's FAC for the period June 1, 2009 to November 30, 2010.

4. On June 13, 2011, the Commission issued its Order Directing Notice, Establishing an Intervention Date and Setting a Deadline for Request a Hearing. Said order established an intervention date of June 30, 2011.

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 general public. Dogwood is an active participant in Case ER-2010-0356. Dogwood takes no position at this time pending further investigation.

6. Granting Dogwood's Application 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 Application 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

Carl J. Lumley, #32869
130 S. Bemiston, Suite 200
Clayton, Missouri 63105
(314) 725-8788
(314) 725-8789 (Fax)
clumley@lawfirmemail.com

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 29th day of June, 2011, to the persons shown on the attached list.

/s/ Carl J. Lumley

General Counsel's Office
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O.Box 360
Jefferson City, Mo 65102
gencounsel@psc.mo.gov

Lewis Mills
Office of the Public Counsel
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opcservice@ded.mo.gov

Nathan Williams
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
Nathan.Williams@psc.mo.gov

Legal Department
KCP&L Greater Missouri Operations Company
One Kansas City Place,
1200 Main Street
P.O. Box 418679
Kansas City, MO 64105