

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the 2011 Resource Plan)	
of Kansas City Power & Light Company.)	File No. EE-2011-0032
)	

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 655 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
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3. On August 4, 2010, KCP&L filed an application with the Missouri Public Service Commission. The applicant has requested that the Commission waive a provision of its Electric Utility Resource Planning (IRP) regulation to allow KCP&L to delay filing its next IRP submission from August 5, 2011 until April 1, 2012.

4. Dogwood seeks to intervene in this proceeding because the Commission's decision could affect Dogwood's interests. Dogwood was an intervenor in KCP&L's prior IRP proceeding, Case No. EE-2008-0034.

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. Dogwood has been an active participant in recent cases involving KCPL. Dogwood takes no position at this time pending further investigation and understanding of KCPL's waiver request.

6. Granting Dogwood's Application to Intervene will also be in the public interest because Dogwood will bring to this proceeding its expertise 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

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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 10th day of August, 2010, to the persons shown on the attached list.

/s/ Carl J. Lumley

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