

In the Matter of the Application of KCP&L)
 Greater Missouri Operations Company for)
 Authority to Transfer Functional Control) Case No. EO-2009-0179
 to Certain Transmission Assets to the Southwest)
 Power Pool, Inc.)

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:

2. All communications and pleadings in this case should be directed to:

3. On November 12, 2008, GMO filed an application with the Missouri Public Service Commission. The applicant has requested that the Commission grant its request to transfer functional control of its transmission system, 60kV and above, to the Southwest Power Pool, Inc. ("SPP").

4. Dogwood seeks to intervene in this proceeding because the Commission's decision could affect Dogwood's interests as a provider of wholesale electric power in the region. Dogwood has been an active participant in recent cases involving GMO, including Case No. E0-2008-0046, which also concerned RTO membership. Dogwood supports the application.

5. 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.

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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 18th day of November, 2008, to the persons shown on the attached list.

/s/ Carl J. Lumley

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