

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the 2017 Integrated Resource)
Plan Annual Update for Kansas City Power &) File No. EO-2017-0229
Light Company)

DOGWOOD ENERGY, LLC'S MOTION 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 and 4 CSR 240-22-080 (3). 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 is the majority owner of the 650 MW combined cycle generating facility located in Pleasant Hill, Missouri.

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

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3. On June 1, 2017, Kansas City Power & Light Company ("KCPL") filed its 2017 Integrated Resource Plan Update, which is required by the Commission's Electric Utility Resource Planning rule, 4 CSR 240-22.

4. Dogwood Energy, LLC is a stakeholder by definition per 4 CSR 240.22.020 (56) based on its intervention in prior KCP&L IRP proceedings, see, eg, Case No. EO-2015-0254.

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 that includes KCP&L's service territory. Dogwood has been an active participant in KCPL IRP cases. Dogwood takes no position at this time pending further investigation and understanding of KCPL's Integrated Resource Plan Update.

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 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

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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing document was either mailed, faxed, or emailed this 15 day of June 2017, to the persons listed below service list.

/s/ Carl J. Lumley

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