

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Resource Plan of                     )  
Kansas City Power & Light Company                     )       File No. EO-2012-0323  
   )

**DOGWOOD ENERGY, LLC'S MOTION TO INTERVENE**

COMES NOW Dogwood Energy, LLC ("Dogwood") and respectfully submits its Motion to Intervene in this proceeding pursuant to 4 CSR 240-2.075. In support of its Motion, 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, 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 April 8, 2012, Kansas City Power & Light Company ("KCPL") filed its 2012 Integrated Resource Plan, which is required by the Commission's Electric Utility Resource Planning rule, 4 CSR 240-22. In that filing, KCP&L indicates it has engaged in combined planning with GMO.

4. On April 12, 2012 the Commission issued its Order Directing Notice and Setting Date for Submission of Intervention Requests. Said order established an intervention date of May 3, 2012.

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 recent cases involving KCPL, including its preceding IRP case, EE-2008-0034. Dogwood takes no position at this time pending further investigation and understanding of KCPL's proposed Integrated Resource Plan.

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 Motion 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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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 19<sup>th</sup> day of April, 2012, to the persons shown on the attached list.

/s/ Carl J. Lumley

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