

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Resource Plan of                     )  
KCP&L Greater Missouri Operations                     )       File No. EO-2012-0324  
Company.   )

**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  
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 April 9, 2012 GMO filed its 2012 Integrated Resource Plan, which is required by the Commission's Electric Utility Resource Planning rule, 4 CSR 240-22.

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 GMO's service territory. Dogwood has been an active participant in recent cases involving GMO, including its preceding IRP case, EE-2009-0237. Dogwood takes no position at this time pending further investigation and understanding of GMO's proposed IRP.

5. 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

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

/s/ Carl J. Lumley

Steve Dottheim  
Missouri Public Service Commission  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
[Steve.Dottheim@psc.mo.gov](mailto:Steve.Dottheim@psc.mo.gov)

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](mailto: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](mailto:opcservice@ded.mo.gov)

James M. Fischer  
1010 Madison Street, Suite 400  
Jefferson City, MO 65102  
[jfischerpc@aol.com](mailto:jfischerpc@aol.com)

Roger W. Steiner  
1200 Main Street, 16<sup>th</sup> Floor  
P.O. Box 418679  
Kansas City, MO 64105  
[roger.steiner@kcpl.com](mailto:roger.steiner@kcpl.com)