

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the 2013 Annual Update of)
KCP&L Greater Missouri Operations Company) File No. EE-2013-0389
Pursuant to 4 CSR 240-22.)

DOGWOOD ENERGY, LLC'S RESPONSE

COMES NOW Dogwood Energy, LLC (“Dogwood”) and pursuant to Commission Order issued February 7, 2013 respectfully submits its Response to KCP&L Greater Missouri Operations Company’s (GMO) Application for Variances as follows:

1. In its Application for Variances, GMO requests an extension of three months in which to file its 2013 Annual IRP Update.

2. As indicated in GMO's Application for Variances, Dogwood was a signatory to the Joint Filing submitted on November 19, 2012 in File No. EO-2012-0324 that included remedies to deficiencies and concerns previously identified by Dogwood and others regarding GMO's integrated resource planning submissions. Additionally, as indicated by GMO, Dogwood was a supporter of the planned three-month extension request at that time.

3. In January 2013, GMO issued a request for proposals regarding capacity and related energy with the stated intent of selecting a bidder by February 1, 2013. Dogwood timely responded to the RFP. GMO subsequently informed Dogwood that no bidder would be selected pursuant to the RFP. However, GMO has nonetheless requested transmission services that would seem to indicate that it does have plans to add a new source of generation capacity and energy in the near term.

4. While Dogwood still generally supports the extension request included in the Application for Variances, it has a specific concern that GMO not enter into binding

commitments with third parties or affiliates pursuant to the RFP (or otherwise) that would conflict with the remedies that it agreed in the Joint Filing to implement in its 2013 Annual Update, particularly given the requested postponement of the filing of the Update. For example, GMO agreed to conduct various new studies about its supply-side alternatives which could dictate a different course of action than is described in the RFP.

5. Dogwood requests that, as a condition of granting the requested variances, the Commission require GMO to confirm that it has not and will not enter into commitments that could be contrary to or preclude the implementation of the results of the studies that it has agreed to perform in connection with the development of its 2013 Annual Update. Dogwood submits that such condition is consistent with GMO's Application, which represents that the variances "will result in the submission of data that is more useful to the Commission and other interested parties."

WHEREFORE, Dogwood respectfully requests that the Commission place conditions on its approval of the Application for Variances as requested herein and grant any further relief that it deems just and proper.

Respectfully submitted,

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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 21st day of February 2013, to the persons shown on the attached list.

/s/ Carl J. Lumley

File/Case No. EE-2013-0389

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