

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of KCP&L Greater Missouri)
Operations Company's Request for Authority to) File No. ER-2016-0156
Implement A General Rate Increase for)
Electric Service) Tracking No. YE-2016-0223

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 owns 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:

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3. On February 23, 2016 the KCP&L Greater Missouri Operations Company ("GMO" or "Company") filed Tariffs for the purpose of making changes to its charges for electric service.

4. On March 3, 2016 the Commission suspended the tariffs until December 22, 2016, initiating a contested case. The Commission set an intervention deadline of March 17, 2016.

5. Dogwood seeks to intervene in this proceeding because the Commission's decision could adversely affect Dogwood's interests as a GMO customer under the specialty "Real Time" tariff (which GMO propose to freeze) and supplier of wholesale power to GMO, which are different than the interests of the general public. Dogwood takes no position at this time on GMO's tariffs pending further investigation.

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 issues being considered 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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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was emailed, faxed or mailed by U.S. Mail, postage paid, this 15th day of March 2016, to the persons shown on the attached list.

/s/ Carl J. Lumley

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