BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Resource Plan of Kansas City Power & Light Company Pursuant to 4 CSR 240-22))	File No. EO-2016-023	
In the Matter of the Resource Plan of KCP&L Greater Missouri Operations Company Pursuant to 4 CSR 240-22)))	File No. EO-2016-0233	

DOGWOOD ENERGY LLC'S STAKEHOLDER COMMENTS

Comes Now Dogwood Energy LLC (Dogwood), pursuant to 4 CSR 240-22.080(3)(D), and for its stakeholder comments states to the Commission:

- 1. KCP&L and GMO filed their 2016 IRP Annual Update Reports on or about March 15, 2016.
- 2. After conducting the required stakeholder workshop on April 26, 2016, KCP&L and GMO filed their Notice pursuant to 4 CSR 240-22.080(3)(C) indicating that they were not making any changes to their Annual Update Reports as a result of the workshop.
- 3. KCP&L and GMO confirmed during the workshop that in generating their Annual Update Reports, for purposes of evaluating the potential impacts of compliance with the Clean Power Plan, they utilized assumptions consistent with their preferred approach as articulated to the Commission at the February 4, 2016 workshop in File No. EW-2012-0065. [Compare page 106 et seq of KCP&L Annual Update and p. 111 et seq of GMO Annual Update, with the companies' Feb 4, 2016 presentation].
- 4. Numerous other approaches regarding CPP compliance were presented for the Commission at the February 4, 2016 workshop, including by Dogwood. [See File No. EW-2012-0065, EFIS items 159-180].
- 5. For purposes of the 2017 Annual Update Reports to be filed by KCP&L and GMO, Dogwood encourages them, and asks the Commission to encourage them as well, to examine the potential impacts of compliance with the CPP utilizing a reasonably broad range of assumptions rather than exclusively assumptions that are consistent with their preferred approach.

WHEREFORE, Dogwood respectfully requests that the Commission consider these comments.

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 mai	iled by U.S.	Mail,
postage paid, this	day of Ma	y 2016, to the	persons show	n on the atta	ched list.	

/s/ Carl J. Lumley

Missouri Public Service Commission Office General Counsel 200 Madison Street, Suite 800 P.O. Box 360 Jefferson City, MO 65102 Phone: 573-751-2690

Fax: 573-751-9285

GenCounsel@psc.mo.gov

Office of the Public Counsel 200 Madison Street, Suite 650 P.O. Box 2230 Jefferson City, MO 65102 Phone: 573-751-1304

Fax: 573-751-5562 opcservice@ded.mo.gov

KCP&L and KCP&L GMO Roger W Steiner 1200 Main Street, 16th Floor Kansas City, MO 64105 Phone: 816-556-2314

Fax: 816-556-2787 roger.steiner@kcpl.com