

In the Matter of the 2008 Resource)
Plan of Kansas City Power & Light) Case No. EE-2008-0034
Pursuant to 4 CSR 240-22.)

COMES NOW Dogwood Energy, LLC (“Dogwood”) and respectfully submits its Application to Intervene in this proceeding pursuant to 4 CSR 240-2.075. In support of its Application, Dogwood states as follows:

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4. The Commission has not yet issued notice as required by 4 CSR 240-22.080.

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. Dogwood has been an active participant in recent cases involving KCPL, including Case Nos. EM-2007-0374 and E0-2008-0046. Dogwood takes no position at this time pending further investigation and understanding of KCPL's Integrated Resource Plan. Dogwood previously filed an entry of appearance, but files their intervention to assure its right to participate.

6. Granting Dogwood's Application 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 Application 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 21st day of October, 2008, to the persons shown on the attached list.

/s/ Carl J. Lumley

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