

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.)

COMES NOW Dogwood Energy, LLC (“Dogwood”) and pursuant to Commission Order issued March 4, 2013 respectfully submits its Reply to KCP&L Greater Missouri Operations Company’s (GMO) Response to Order Directing Filing in this matter concerning GMO’s Application for Variances as follows:

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5. To clarify, what Dogwood has requested is simply that GMO not enter into commitments that would arguably give third parties, including affiliates, contractual rights that conflict with, and thereby potentially preclude GMO from meeting, the commitments it has made to the stakeholders in these proceedings. Stating it yet another way, Dogwood is trying to prevent a situation wherein GMO reports back that the studies it has committed to undertake in connection with preparation and submittal of its 2013 Annual Update have been rendered moot by the passage of time prior to fulfillment of those commitments including as a result of its extension/variance request.

6. From Dogwood's perspective, the stakeholders and GMO have worked cooperatively together to improve GMO's resource planning practices. Such cooperation should not be rendered moot by premature actions that are contrary to agreed-upon planning improvement methods and the final results to be derived therefrom.

7. The proposed condition would expire on its own as GMO's commitments are fulfilled and final plans produced. An arbitrary time limit that does not take into account the rights of stakeholders to participate in a workshop and comment on an update filing (4 CSR 240-22.080(3)), would not seem appropriate.

8. Dogwood would hope that with these clarifications, GMO would have no objection.

WHEREFORE, Dogwood respectfully requests that the Commission place conditions on its approval of the Application for Variances as proposed and grant any further relief that it 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 7th day of March 2013, to the persons shown on the attached list.

/s/ Carl J. Lumley

File/Case No. EE-2013-0389

**Missouri Public Service
Commission**

Steve Dottheim
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
Steve.Dottheim@psc.mo.gov

**Missouri Public Service
Commission**

Office General Counsel
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

Office of the Public Counsel

Lewis Mills
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opc@opc.mo.gov

City of Kansas City, Missouri

Mark W Comley
601 Monroe Street, Suite 301
Jefferson City, MO 65102-0537
comley@ncrkc.com

**KCP&L Greater Missouri
Operations Company**

James M Fischer
101 Madison Street, Suite 400
Jefferson City, MO 65101
jmfischer@aol.com

**KCP&L Greater Missouri
Operations Company**

Roger W Steiner
1200 Main Street, 16th Floor
P.O. Box 418679
Kansas City, MO 64105-9679
roger.steiner@kcpl.com

Midwest Energy Consumers Group

David Woodsmall
807 Winston Court
Jefferson City, MO 65101
david.woodsmall@woodsmalllaw.com

Midwest Energy Users' Association

Stuart Conrad
3100 Broadway, Suite 1209
Kansas City, MO 64111
stucon@fcplaw.com

**Missouri Department of Natural
Resources**

Jessica L Blome
221 W. High Street
P.O. Box 899

Jefferson City, MO 65102
Jessica.Blome@ago.mo.gov

Missouri Gas Energy

Dean L Cooper
312 East Capitol
P.O. Box 456
Jefferson City, MO 65102
dcooper@brydonlaw.com

Missouri Gas Energy

Todd J Jacobs
3420 Broadway
Kansas City, MO 64111
todd.jacobs@sug.com

Missouri Gas Energy

Michael R Noack
3420 Broadway
Kansas City, MO 64111
mike.noack@sug.com

**Missouri Joint Municipal Electric
Utility Commission**

Douglas Healy
939 Boonville Suite A
Springfield, MO 65802
doug@healylawoffices.com