

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application)
of KCP&L Greater Missouri Operations for)
Authority to Extend the Transfer of) File No. EO-2012-0136
Functional Control of Certain)
Transmission Assets to the Southwest)
Power Pool.)

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 November 1, 2011, the Commission filed its Notice Opening File to consider Kansas City Power & Light Company's (KCPL) and GMO's joint request for approval of continued participation in the Southwest Power Pool (SPP) regional transmission organization beyond October 1, 2012.

4. On November 2, 2011, the Commission issued its Order Providing Notice and Establishing an Intervention Deadline. The order established an intervention date of November 22, 2011.

5. Dogwood seeks to intervene in this proceeding because the Commission's decision could adversely affect Dogwood's interests as an SPP member and as a GMO customer and supplier, which are different than the interests of the general public. The terms and conditions of GMO's and KCPL's continued participation in SPP could have a direct impact on Dogwood's plant in GMO's service area. Dogwood was an active participant in Case EO-2009-0179 in which participation in SPP was previously considered. Dogwood takes no position at this time on GMO's and KCPL's request 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 November 2011, to the persons shown on the attached list.

/s/ Carl J. Lumley

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