

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of KCP&L Greater)	
Missouri Operations Company's)	Case No. EO-2018-0269
2018 Triennial Compliance)	
Filing Pursuant to 4 CSR 240-22.)	

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 240-22 and 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 an interest in and manages the Dogwood Energy Facility, a 650 MW jointly-owned combined cycle generating facility located in Pleasant Hill, Missouri.

2. All communications and pleadings in this case should be directed to:

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3. On April 2, 2018, KCP&L Greater Missouri Operations Company's ("GMO") submitted information pursuant to the Commission's Electric Utility Resource Planning (Chapter 22) reporting requirements.

4. GMO's filing includes information developed in conjunction with the stakeholders including Dogwood. Dogwood is a source of generation available to GMO.

5. Dogwood seeks to intervene in this proceeding because the Commission's decision could affect Dogwood's interests. Dogwood takes no position at this time 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 areas being investigated 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 document was either mailed, faxed, or emailed this 25 day of April 2018, to the persons listed on the below service list.

/s/ Carl J. Lumley

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