BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Fourth Prudence)	
Review of Costs Subject to the)	File No. EO-2013-0325
Commission-Approved Fuel Adjustment)	
Clause of KCP&L Greater Missouri)	
Operations Company.)	

DOGWOOD ENERGY, LLC'S APPLICATION TO INTERVENE

COMES NOW Dogwood Energy, LLC ("Dogwood") and respectfully submits its Application to Intervene in this proceeding pursuant to 4 CSR 240-2.075 and 3.161(10). In support of its Application, 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:

Carl J. Lumley
Curtis, Heinz, Garrett & O'Keefe, P.C.
130 S. Bemiston, Suite 200
Clayton, Missouri 63105
(314) 725-8788
(314) 725-8789 (Fax)
clumley@lawfirmemail.com

3. On December 6, 2012, Staff of the Missouri Public Service Commission filed its Notice of Start of Fourth Prudence Audit indicating that it plans to conduct a prudence review of the costs and revenues associated with GMO's FAC for the period June 1, 2011 to November 30, 2012.

4. On December 10, 2012, the Commission issued its Order Directing Notice, Establishing an Intervention Date and Setting a Deadline for Requesting a Hearing, establishing an intervention date of December 31, 2012.

5. Dogwood seeks to intervene in this proceeding because the Commission's decision could adversely affect Dogwood's interests as a GMO customer and supplier, which are different than the general public. Dogwood has been an active participant in GMO's recent rate cases in which its FAC has been approved, and is a party to the pending case, File ER-2012-0175. Accordingly, Dogwood is a proper party pursuant to 4 CSR 240-3.161(10). Dogwood takes no position at this time pending further investigation.

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

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 14th day of December, 2012, to the persons shown on the attached list.

/s/ Carl J. Lumley

File/Case No. EO-2013-0325 and ER-2012-0175

Office of the Public Counsel

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

Missouri Public Service Commission

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

Missouri Public Service Commission

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

Missouri Public Service Commission

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

Natural Resources Defense Council

Shannon Fisk 1617 John F. Kennedy Blvd, Suite 1675 Philadelphia, PA 19103 sfisk@earthjustice.org

Natural Resources Defense Council

Henry B Robertson 705 Olive Street, Suite 614 St. Louis, MO 63101 hrobertson@greatriverslaw.org

Renew Missouri

Shannon Fisk 1617 John F. Kennedy Blvd, Suite 1675 Philadelphia, PA 19103

sfisk@earthjustice.org

Renew Missouri

Henry B Robertson 705 Olive Street, Suite 614 St. Louis, MO 63101 hrobertson@greatriverslaw.org

Sierra Club

Shannon Fisk 1617 John F. Kennedy Blvd, Suite 1675 Philadelphia, PA 19103 sfisk@earthjustice.org

Sierra Club

Henry B Robertson 705 Olive Street, Suite 614 St. Louis, MO 63101 hrobertson@greatriverslaw.org

Union Electric Company

James B Lowery 111 South Ninth St., Suite 200 P.O. Box 918 Columbia, MO 65205-0918 lowery@smithlewis.com

Union Electric Company

Thomas M Byrne 1901 Chouteau Avenue P.O. Box 66149 (MC 1310) St. Louis, MO 63166-6149 AmerenMOService@ameren.com

United States Air Force-Whiteman AFB

Steven E Jones 1104 SE Talonia Drive Lees Summit, MO 64081 sejcaj@kc.rr.com

United States Department of Energy

Therese LeBlanc 2000 E. 95th St. P.O. Box 419159 Kansas City, MO 64141 tleblanc@kcp.com

AARP

John B Coffman 871 Tuxedo Blvd. St. Louis, MO 63119-2044

john@johncoffman.net

AG Processing, Inc

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

City of Kansas City, Missouri

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

Consumers Council of Missouri

John B Coffman 871 Tuxedo Blvd. St. Louis, MO 63119-2044 john@johncoffman.net

Federal Executive Agencies

Steven E Jones 1104 SE Talonia Drive Lees Summit, MO 64081 sejcaj@kc.rr.com

KCP&L Greater Missouri Operations Company

Legal Department One Kansas City Place, 1200 Main Street P.O. Box 418679 Kansas City, MO 64105

KCP&L Greater Missouri Operations Company

Lisa A Gilbreath 4520 Main, Suite 1100 Kansas City, MO 64111 lisa.gilbreath@snrdenton.com

KCP&L Greater Missouri Operations Company

James M Fischer 101 Madison Street, Suite 400 Jefferson City, MO 35101 jfischerpc@aol.com

KCP&L Greater Missouri Operations Company

Heather A Humphrey 1200 Main PO Box 418679 Kansas City, MO 64141-9679 Heather.Humphrey@kcpl.com

KCP&L Greater Missouri Operations Company

Karl Zobrist 4520 Main Street, Suite 1100 Kansas City, MO 64111 karl.zobrist@snrdenton.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

KCP&L Greater Missouri Operations Company

Charles W Hatfield 230 W. McCarty Street Jefferson City, MO 65101-1553 chatfield@stinson.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 Industrial Energy Consumers (MIEC) Diana M Vuylsteke 211 N. Broadway, Suite 3600 St. Louis, MO 63102 dmvuylsteke@bryancave.com