

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the 2009 Resource)	
Plan of KCP&L Greater Missouri)	Case No. EE-2009-0237
Operations Company)	
Pursuant to 4 CSR 240-22)	

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. 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 625 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 4 2008, GMO filed its Application for Waivers Concerning the 2009 Integrated Resource Plan it plans to file in August, 2009.

4. 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 GMO, including Case Nos. EM-2007-0374, E0-2008-0046 and EO-2007-0298. Dogwood takes no position at this time pending further investigation and understanding of GMO's Application.

5. 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 10th day of December, 2008, to the persons shown on the attached list.

/s/ Carl J. Lumley

General Counsel's Office
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O.Box 360
Jefferson City, Mo 65102
gencounsel@psc.mo.gov

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

Curtis Blanc
Kansas City Power and Light
1201 Walnut, 20th Floor
Kansas City, MO 64106
curtis.blanc@kcpl.com