

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of)
Kansas City Power & Light Company)
for Approval to Make Certain Changes) File No. ER-2010-0355
to its Charges for Electric Service to) Tariff No.: JE-2010-0692
Continue the Implementation of its)
Regulatory Plan.)

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 stipulations of other parties. 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 655 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 June 4, 2010, KCP&L filed an application with the Missouri Public Service Commission. The applicant has requested to make changes to its charges for electric service, a substantial portion of which proposed increase is directly related to plant additions, particularly KCP&L's share of Iatan 2, an 850 MW super critical, coal-fired generation

facility and KCP&L's share of its investment in environmental control equipment of Iatan 1 and Iatan Common plant.

4. Dogwood seeks to intervene in this proceeding because the Commission's decision could affect Dogwood's interests. Dogwood is an approved intervenor in the companion rate case filed by GMO, Case No. ER-2010-0356. Pursuant to stipulations of the parties filed in this case and Case No. ER-2010-0356, certain issues that would otherwise also be tried in Case No. ER-2010-0356 will, for efficiency purposes, only be tried in this case. **(See Stipulations, II The Action Plan, A.3.c).** For that reason in such stipulations, other parties have agreed that Dogwood and others, previously only party to Case No. ER-2010-0356, should be allowed to intervene in this case to protect their interests and due process rights. **(Id.)** Dogwood takes no position at this time on any particular issue pending further investigation and understanding of KCPL's proposals. Dogwood's intervention will not cause delay, but rather will contribute to efficient resolution of both cases, including by allowing certain issues to only be heard once as indicated. Dogwood has already stipulated to the proposed case schedule for these cases.

5. Granting Dogwood's Application to Intervene will also be in the public interest because Dogwood will bring to this proceeding its expertise 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

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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 30th day of July, 2010, to the persons shown on the attached list.

/s/ Carl J. Lumley

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