

In the Matter of the Resource Plan of)
 Kansas City Power & Light Company) File No. EO-2015-0254
)

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:

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4. On April 3, 2015 the Commission issued its Order Directing Notice and Setting Date for Submission of Intervention Requests. Said order established an intervention date of April 20, 2015.

5. 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 that includes KCP&L's service territory. Dogwood has been an active participant in recent cases involving KCPL, including its preceding IRP cases. Dogwood takes no position at this time pending further investigation and understanding of KCPL's proposed Integrated Resource Plan.

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 was emailed, faxed or mailed by U.S. Mail, postage paid, this _____ day of April, 2015, to the persons shown on the attached list.

/s/ Carl J. Lumley_____

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