

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of Kansas City Power & Light Company's 2018 Triennial Compliance Filing Pursuant to 4 CSR 240-22. ) Case No. EO-2018-0268

**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:

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 April 2, 2018, Kansas City Power & Light Company's (KCP&L) submitted information pursuant to the Commission's Electric Utility Resource Planning (Chapter 22) reporting requirements.

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

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

---

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 document was either mailed, faxed, or emailed this 26 day of April 2018, to the persons listed on the below service list.

/s/ Carl J. Lumley

---

Missouri Public Service Commission  
General Counsel Office  
P.O. Box 360  
200 Madison Street, Suite 800  
Jefferson City, MO 65102  
[Staffcounselservice@psc.mo.gov](mailto:Staffcounselservice@psc.mo.gov)

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

KCP&L  
Roger W. Steiner  
PO Box 418679  
1200 Main Street, 19<sup>th</sup> Floor  
Kansas City MO 64105-9679  
[Roger.steiner@kcpl.com](mailto:Roger.steiner@kcpl.com)