

**BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**

In the Matter of the Application of Aquila, )  
Inc. d/b/a KCP&L Greater Missouri )  
Operations Company for Approval ) Case No. ER-2009-0090  
to Make Certain Changes to its Charges )  
for Electric Service. )

**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 Aquila, Inc. d/b/a KCP&L Greater Missouri Operations Company ("GMO").

2. All communications and pleadings in this case should be directed to:

Carl J. Lumley  
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3. On September 5, 2008, GMO filed an application with the Missouri Public Service Commission. The applicant has requested to make changes to its charges for electric service, at least in part in relation to projects involving Crossroads peaking capacity, Sibley selective catalytic reduction, and Iatan air quality control.

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 and E0-2008-0046. Dogwood takes no position at this time pending further investigation and understanding of GMO's proposals.

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

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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 September, 2008, to the persons shown on the attached list.

/s/ Carl J. Lumley

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