

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of an Investigation of Missouri)
Jurisdictional Generator Self-Commitments) Case No. EW-2019-0370
Into SPP and MISO Day-Ahead Markets.)

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 Commission Order 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 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:

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3. On June 5, 2019, the Commission opened this working docket and directed Staff to investigate the self-commit and self-schedule practices of Missouri IOUs in their respective RTO energy markets. The IOUs and others have filed information. Some of the information has been submitted into EFIS on a confidential basis. On July 15, 2019 the Commission issued notice that stakeholders would be allowed to intervene in order to become able to review all submitted information.

4. Dogwood seeks to intervene in this proceeding because IOU self-committing and self-scheduling decisions affect Dogwood's unique interests as the operator of the only independent generation station in the state. Dogwood takes no position at this time, but desires to be able to fully participate subject to Commission rules regarding confidential filings.

5. 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.

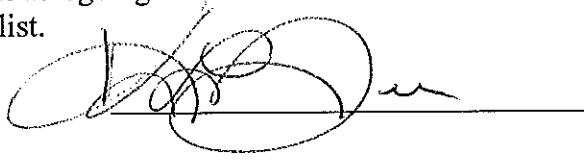
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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing document was emailed this 17th day of July 2019, to the persons listed below service list.



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