## BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of The Empire District	)	
Electric Company's 2016 Triennial	)	Case No. EO-2016-0223
Compliance Filing Pursuant to 4 CSR 240-22.	)	

## DOGWOOD ENERGY LLC'S COMMENTS

Comes Now Dogwood Energy LLC (Dogwood), pursuant to 4 CSR 240-22.080(8), and for its intervenor comments regarding The Empire District Electric Company's (Empire) 2016 Triennial Compliance Filing Pursuant to 4 CSR 240-22 (IRP Triennial Report), states to the Commission:

- 1. Empire filed its 2016 IRP Triennial Report on or about April 1, 2016.
- 2. The Commission approved Dogwood's intervention on July 11, 2016.
- 3. Empire appears to have taken a fairly limited approach to planning for implementation of the Clean Power Plan, citing the attendant uncertainties. (Executive Summary, p. 42). Empire's IRP seems to focus solely on potential levels of carbon costs in this respect. (Executive Summary, p. 36-37, Vol. 7, p 20-23, 31-32, 35-36).
- 4. Numerous approaches regarding CPP compliance were presented for the Commission at its February 4, 2016 workshop in File No. EW-2012-0065, including by Dogwood. [See File EFIS items 159-180].
- 5. The Commission should encourage Empire to examine the potential impacts of compliance with the CPP utilizing a reasonably broad range of assumptions.

WHEREFORE, Dogwood respectfully requests that the Commission consider these comments.

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@chgolaw.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 August 2016, to the persons listed on the below service list.

75/ Carr J. Dunnicy	/s/	Carl	J.	Lumley	
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Missouri Public Service Commission General Counsel Office P.O. Box 360 200 Madison Street, Suite 800 Jefferson City, MO 65102 Staffcounselservice@psc.mo.gov

Office of the Public Counsel P.O. Box 2230 200 Madison Street, Suite 650 Jefferson City, MO 65102 opcservice@ded.mo.gov

Empire District Electric Company, The Dean L. Cooper P.O. Box 456
312 East Capitol
Jefferson City, MO 65102
dcooper@brydonlaw.com

Andrew J. Linhares Staff Attorney, Renew Missouri 910 E. Broadway, Ste. 205 Columbia, MO 65201 Andrew@renewmo.org Alexander Antal Associate General Counsel Department of Economic Development P.O. Box 1157 Jefferson City, MO 65102 alexander.antal@ded.mo.gov

Douglas L. Healy Healy Law Offices, LLC 3010 E. Battlefield, Suite A Springfield, Missouri 65804 doug@healylawoffices.com

Henry B. Robertson Great Rivers Environmental Law Center 319 N. 4th St., Suite 800 St. Louis, Missouri 63102 hrobertson@greatriverslaw.org