

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of )  
The Empire District Electric Company )  
for Approval of its Customer Savings ) Case No. EO-2018-0092  
Plan. )

**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 240-2.075. 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 is the majority owner of the 650 MW 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  
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3. On October 5, 2017, Empire District Electric Company (Empire) filed notice of intent to commence this proceeding regarding the construction of certain electric generation facilities.

4. On October 31, 2017 Empire filed its application in this proceeding.

5. Dogwood Energy, LLC is a stakeholder in matters concerning Empire generation resources by definition per 4 CSR 240.22 based on its interventions in prior Empire

integrated resource planning (IRP) proceedings, see, e.g., Case Nos. EO-2017-0233, EO-2016-0223, EO-2015-0216, EO-2013-0547.

6. 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 Empire's service territory. Dogwood has been an active participant in Empire IRP cases and is an available source of capacity and energy for Empire. Dogwood takes no position at this time pending further investigation and understanding of Empire's "Customer Savings Plan" and the proposed construction and retirement of generation facilities.

7. The Commission established an intervention deadline of November 22, 2017, so this motion is timely filed.

8. 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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Attorneys for Dogwood Energy, LLC

#### **CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing document was served this 21 day of November 2017, to the parties as listed on the Commission's electronic filing system through that system.

/s/ Carl J. Lumley

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