

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 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 a majority 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:

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 1, 2016, The Empire District Electric Company's (Empire) submitted information pursuant to the Commission's Electric Utility Resource Planning (Chapter 22) reporting requirements.

4. Dogwood has participated as intervenor and stakeholder regarding Empire's prior triennial IRP submittal (File No. EO-2013-0547) and subsequent annual updates, as well as earlier IRP proceedings. Dogwood is a source of generation available to Empire.

5. Dogwood seeks to intervene in this proceeding because the Commission's decision could affect Dogwood's unique interests as the operator of the only independent generation station in the state. 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@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 29 day of June 2016, 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
Staffcounsel@psc.mo.gov

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