

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of Kansas City Power & Light)
Company's Request for Authority to) File No. ER-2018-0145
Implement a General Rate Increase for)
Electric Service)
)
In the Matter of KCP&L Greater Missouri) File No. ER-2018-0146
Operations Company's Request for Authority)
To Implement a General Rate Increase for)
Electric Service)

DOGWOOD ENERGY LLC'S STATEMENT OF POSITION

Comes Now Dogwood Energy, LLC and for its Statement of Position states to the Commission:

IV. Tariffs

C. Real Time Pricing – Should the Commission eliminate or unfreeze each utility's Real Time Pricing tariffs, as proposed by KCPL and GMO?

The Commission should reject GMO's proposal to cancel its Real Time Pricing ("RTP") tariff, which sets forth the terms of service to Dogwood and others. Dogwood is both a retail power customer of GMO and wholesale power supplier to, and competitor of GMO.

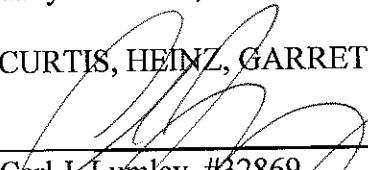
Due to the nature of Dogwood's operations, which is the production of electricity, its use of energy from GMO for station power service is not coincident with the peak loads of GMO's system. As a result, Dogwood's operations are consistent with the intended purposes of the RFP tariff, and do not contribute significantly to GMO's costs of service. Non-utility generating facilities similar to Dogwood have access to real time pricing for station power use in other parts of the country. GMO's suggested replacement tariff rate would more than double Dogwood's costs for electricity from GMO. An unjustified increase in Dogwood's costs for station power service from GMO would unreasonably subject the Dogwood facility to a competitive disadvantage and would result in unjust and unreasonable rate increases to the customers of the

municipal utility co-owners of the Dogwood facility in Missouri and Kansas. Further, cancellation of the RTP tariff would be inconsistent with the trend towards time of use rates.

At the very least, GMO's proposal to cancel the RTP tariff should be deferred so that the parties can work on alternative solutions. (Janssen Rebuttal, G. Meyer rebuttal).

Respectfully submitted,

CURTIS, HEINZ, GARRETT & O'KEEFE, P.C.



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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was emailed this 19 day of September 2018, pursuant to the Commission's electronic filing system.

/s/Carl J. Lumley