

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

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

**DOGWOOD ENERGY LLC's POSITION STATEMENT**

Comes now Dogwood Energy, LLC and states its position on the issues identified on the parties' Joint List of Issues:

1. Does the Commission have authority to grant Empire's requests?

No position.

2. Which of Empire's requests, if any, should the Commission grant?

For the reasons set forth in the testimony of Public Counsel and Staff witnesses, the Commission should not grant the requests.

3. What requirements should be applied to the Asbury regulatory asset?

No position.

4. Should Empire be required to make any additional filings in relation to the CSP? If so, what filings?

No position.

5. Should the Commission impose any requirements in regard to tax equity financing? If so, what requirements?

No position.

6. What conditions, if any, should be applied to the Asbury Employees?

No. position.

7. Should the Commission require conditions related to any impacts on local property taxes?

If so, what conditions?

No position.

8. Should there be any requirements associated with the Tax Cuts and Jobs Act of 2017? If

so, what requirements?

No position.

9. Should there be any requirements associated with potential impacts of the Wind Projects on wildlife? If so, what requirements?

No position.

10. Should the Commission grant waivers of its affiliate transaction rules for the affiliate agreements associated with the CSP?

No position.

Respectfully submitted,

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

/s/ Carl J. Lumley

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**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing document was served this 4th day of April 2018, to the parties as listed on the Commission's electronic filing system through that system.

/s/ Carl J. Lumley

Carl J. Lumley