

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the 2022 Triennial Compliance)
Filing Pursuant to 20 CSR 4240-22 by The) Case No. EO-2021-0331
Empire District Electric Company dba Liberty)

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 20 CSR 4240-22 and 20 CSR 4240-2.075.

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 an interest in and manages 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
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3. On April 1, 2021, The Empire District Electric Company dba Liberty (Liberty) submitted requests for variances in anticipation of filing its next Triennial Integrated Resource Plan pursuant to the Commission's Electric Utility Resource Planning (Chapter 22) reporting requirements.

4. On April 5, 2021, the Commission issued its order setting an intervention deadline of April 26, 2021.

5. Dogwood has participated as intervenor and stakeholder regarding Empire's prior triennial IRP submittals and annual updates. Dogwood is a source of generation available to Empire.

6. Dogwood seeks to intervene in this proceeding because the Commission's decision could affect Dogwood's unique interests as the operator of an independent generation station in the state. Dogwood takes no position at this time pending further investigation.

7. 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 either mailed, faxed, or emailed this 19th day of April 2021, to the persons listed on the below service list.

/s/ Carl J. Lumley

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