

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of KCP&L Greater Missouri)
Operations Company’s Request for Authority) File No. ER-2018-0146
To Implement a General Rate Increase for)
Electric Service)

DOGWOOD ENERGY, LLC’S FIRST DATA REQUESTS TO KCPL GMO

COMES NOW Dogwood Energy, LLC (“Dogwood”) and submits the following data request to KCPL GMO pursuant to Commission rules and orders:

1. In her direct testimony at p 23-24, witness Marisol Miller states that the company proposes to eliminate the frozen Real-Time Pricing tariffs “given the administratively burdensome nature to maintain these frozen tariffs.” On schedule MEM-7 to her testimony, she states that there are no customers served by these frozen rates and that the “administrative effort to continue to offer this unused product and maintain the tariff is overly burdensome.”

A. Please confirm that Dogwood Energy is currently served pursuant to the frozen Real-Time Pricing tariffs, or state which tariffs presently govern service to Dogwood and provide copies thereof, and provide copies of all proposed replacement tariffs to govern service to Dogwood.

B. Explain in detail the administrative burdens referenced by Ms. Miller and itemize the annual costs of maintaining the Real-Time Pricing Tariffs incurred by GMO since the tariffs became frozen.

C. Provide copies of any communications sent to Dogwood informing it of the proposal to cancel the Real-Time Pricing Tariff and/or to change the terms of service to the Dogwood generation plant.

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 was emailed, faxed or mailed by U.S. Mail, postage paid, this 14th day of March 2018, pursuant to the Commission's electronic filing system.

_____/s/Carl J. Lumley