

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In The Matter Of A Repository File)	
Concerning Staff's Review Of The)	File No. EW-2011-0139
Commission's Fuel Adjustment Clause)	
Rules)	

**DOGWOOD ENERGY, LLC'S REPLY COMMENTS ON PROPOSED RULE
AMENDMENTS**

COMES NOW Dogwood Energy, LLC ("Dogwood") and supplementing its prior Comments filed in October 2015, submits its reply to Ameren's recent comments regarding Staff's September, 2015 draft Proposed Rule Amendments:

1. For consistency, it would appear that Ameren's proposed clarifications of the definition of "net base energy costs" (kWh **measured** at the regional transmission organization's **applicable** price node) would be equally pertinent to the definition of "base factor".

2. For consistency, it would appear that the added reference in subsection (3)(A)1 to a proposed notice "to be approved by the commission" would be equally pertinent to the sample notice required under subsection 2(A)1.

3. The proposed deletion of the phrase "by the commission" in subsection 5(D) seems inconsistent with other sections where such wording is retained (i.e. 2(A)10).

4. Subsection 8(K) refers to FAFs, which appears to be a typo.

WHEREFORE, Dogwood Energy asks the Staff to take these comments and Dogwood Energy's prior comments into account in developing their final proposed rule changes.

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 was emailed, faxed or mailed by U.S. Mail, postage paid, this 1st day of March, 2016, to the persons on Staff's email distribution of September 29, 2015.

/s/ Carl J. Lumley