

In the Matter of The Empire District  
Electric Company's 2019 Triennial  
Compliance Filing Pursuant to 4 CSR 240-22.

COMES NOW Dogwood Energy, LLC (“Dogwood”) and respectfully submits its Motion to Intervene in this proceeding pursuant to 4 CSR 240-22 and 4 CSR 240-2.075. In support of its Motion, Dogwood states as follows:

2. All communications and pleadings in this case should be directed to:

3. On June 28, 2019, The Empire District Electric Company's (Empire) submitted information pursuant to the Commission's Electric Utility Resource Planning (Chapter 22) reporting requirements.

4. 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.

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

6. 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

---

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 document was either mailed, faxed, or emailed this 12<sup>th</sup> day of July 2019, to the persons listed on the below service list.

/s/ Carl J. Lumley

---

Missouri Public Service Commission  
General Counsel Office  
P.O. Box 360  
200 Madison Street, Suite 800  
Jefferson City, MO 65102  
[Staffcounsel@psc.mo.gov](mailto:Staffcounsel@psc.mo.gov)

Office of the Public Counsel  
P.O. Box 2230  
200 Madison Street, Suite 650  
Jefferson City, MO 65102  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)

Empire District Electric Company, The  
Diana Carter  
428 E. Capital Drive, Suite 303  
Jefferson City, MO 65101  
[Diana.carter@libertyutilities.com](mailto:Diana.carter@libertyutilities.com)

City of Joplin, Missouri Legal Department  
602 S. Main  
Joplin, MO 64801

Midwest Energy Consumers Group Legal  
Department  
807 Winston Court  
Jefferson City, MO 65101

Midwest Energy Users' Association Legal  
Department  
215 West Main St.  
P.O. Box 186

Cleveland, MO 64734

Missouri Division of Energy  
Rochelle Reeves  
301 W. High St.  
P.O. Box 1157  
Jefferson City, MO 65102-1157  
[reeves.deenergycases@ded.mo.gov](mailto:reeves.deenergycases@ded.mo.gov)

Missouri Joint Municipal Electric Utility  
Commission Legal Department  
1808 Interstate 70 Dr. SW  
Columbia, MO 65203

Renew Missouri  
Tim Opitz  
409 Vandiver Dr  
Building 5, Ste. 205  
Columbia, MO 65202  
[tim@renewmo.org](mailto:tim@renewmo.org)