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Missouri Public
Service Commission

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Missouri Public Service Commission
200 Madison Street
Jefferson City, Missouri 65102

RE: Docket EW-2009-0412 – Comments of Dogwood Energy, LLC

Dear Commissioners:

In conjunction with our presentation today, we confirm that Dogwood supports the following two specific changes to the pending draft new Chapter 22 IRP rules.

1. Dogwood suggests adding a new section 22.040(4)(D) to ensure consideration of the additional costs that will be incurred to assure reliable integration of intermittent or uncontrollable supply sources, as follows:

"(D) The utility shall include the costs of ancillary and/or back-up sources of supply required to achieve necessary reliability levels in connection with intermittent and/or uncontrollable sources of generation, in the cost of supply-side candidate resource options advanced for purposes of developing the alternative resource plans required by 4 CSR 240-22.060(3)."

2. Dogwood suggests revising the wording of 22.070(6)(E) to require a utility's implementation plan to include adequate competitive bidding policies, rather than simply a description if it happens to have any such policies, as follows:

"(E) A description of adequate competitive procurement policies to be used in acquisition and development of supply side resources."

We will rely on our presentation in support of these two changes. Thank you for your continuing efforts in this rulemaking process.

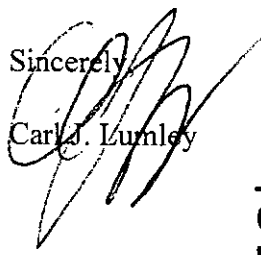
Sincerely,

Carl J. Lumley

Exhibit No. 1
Case No(s) EW-2009-0412
Date 1-25-2010 Rptr KF