

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of a Proposed Amendment)
to the Commission's Fuel Adjustment Clause Rules) File No. EX-2016-0294
)
)

COMMENTS OF DOGWOOD ENERGY LLC

Comes Now Dogwood Energy LLC and submits the following suggested changes to the proposed revision of 4 CSR 240-20.090.

Subsection (1)

Item (T) “Net base energy costs” – suggest inserting the word “applicable” before “price node” – compare to item (D)

Item (W) “Rebase energy costs” – suggest rewording to read “means the base energy cost as reset in each general rate proceeding in which the FAC is continued or modified”

Subsection (2)

Sub-item A18 – suggest rewording to make clear that heat rate/efficiency testing is mandatory by changing “that were conducted” to “conducted within the past 24 months”

Subsection (3)

In text prior to item A, delete comma after “rates”

Subsection (5)

Item (D) – first sentence, insert “by the Commission” after “ordered”

Subsection (6) –

Item A – sub-item 1 – first sentence, insert “by the Commission” after “specified”

Subsection (7) - the Commission has revised its confidentiality rule, so the reference to “highly” confidential should be deleted

Subsection (8)

Item (K) - delete scope-limiting phrase “pursuant to 4 CSR 240-2.135” and after “required to submit” (line 3) insert “by this rule”

Subsection (9)

Item D – there is duplicated text in this section, including reference to rescinded 3.161.

Item G - delete scope-limiting phrase “pursuant to 4 CSR 240-2.135” and after “required to submit” (line 3) insert “by this rule”

Item G.2, line 2 – suggest “will” rather than “shall”

Subsection (11)

In line 2, replace “costs” with “fuel and purchased power costs and fuel-related revenue”

Subsection (13)

In line 8, insert “must be” after “system loss study”

Subsection (17)

Item (A) – in line 6, after “provided” insert “access to”

WHEREFORE, Dogwood Energy LLC asks the Commission to consider these suggested changes in making its final rulemaking decision.

Respectfully submitted,

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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 6th day of August 2018, pursuant to the Commission's electronic filing system

/s/Carl J. Lumley