

In the Matter of the Resource Plan of)
KCP&L Greater Missouri Operations Company) Case No. EO-2013-0538

COMES NOW Dogwood Energy, LLC (“Dogwood”) and respectfully submits its Reply Comments and Continued Request for Hearing in this proceeding pursuant to 4 CSR 240-22.080, as follows:

1. On August 20, 2013, Dogwood submitted its Comments and Request for Hearing. Therein Dogwood indicated that GMO did not comply with the prior Joint Filing and related Commission order in File No. EO-2012-0324, concerning its IRP submittals, because it did not analyze the supply side options of acquiring a minority interest in the Dogwood facility and/or retiring the Crossroads plant in a manner that used the same methods, assumptions and net capacity additions as the other alternative resource plans that it studied. Dogwood further indicated that GMO continues to fail to use minimization of NPVRR as the primary criterion for selecting a preferred alternative resource plan and continues to fail to fully evaluate supply-side resource options as required by the Commission's IRP rules.

2. In its September 13, 2013 Response, GMO essentially acknowledges its commitments, but incorrectly asserts that Dogwood only takes issue with the results of its analysis. Again, Dogwood takes issue with GMO's non-compliant methods, which then of course by design lead to skewed results.

3. GMO also mischaracterizes Dogwood as its “competitor”, when in fact Dogwood is a customer and a supplier that is subject to harm from monopoly abuses. GMO also inexplicably omits Dogwood from various lists of stakeholders provided in its Response, although indisputably Dogwood has been a participating stakeholder in GMO’s resource planning proceedings for many years.

4. GMO contends that no hearing is necessary in these proceedings, yet it seeks a substantive ruling from the Commission that it has complied with its commitments to Dogwood and other stakeholders. But the Commission cannot make such a ruling without holding a hearing and developing a record.

5. GMO suggests that the Commission should defer consideration of the issues raised by Dogwood and other stakeholders to yet another IRP filing down the road. But as the recent Empire IRP proceedings make plain, such delays ultimately result in the utility making end runs around stakeholder concerns by entering into resource commitments in between filings (i.e. Empire’s planned \$125,000,000+ Riverton 12 generating plant conversion) without seeking the requisite preapproval from the Commission under Section 393.170 RSMo.¹

6. Dogwood continues to assert that the Commission should schedule a hearing pursuant to Rule 22.080 regarding the still-unresolved deficiencies of GMO’s IRP submittals and its related violation of the Commission’s Order approving the Joint Filing. After conducting such hearing, the Commission should order GMO to conduct new analyses in compliance with the IRP rules and remedy deficiencies in its resource planning.

¹ See File Nos. EO-2012-0294 and EO-2014-0547.

WHEREFORE, Dogwood respectfully requests that the Commission set a prehearing conference, direct the parties to submit a proposed procedural schedule, and set this matter for hearing to address deficiencies in GMO's attempts to comply with the Commission's IRP rules, 4 CSR 240-22, and grant such other relief as the Commission determines to be just and reasonable.

Respectfully submitted,

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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing document was either mailed, faxed, or emailed this 19th day of September 2013, to the persons listed on the below service list.

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