

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Consideration of )  
Adoption of the PUROA Section 111(d)(17) )  
Rate Design Modifications to Promote ) Case No. EO-2009-0248  
Energy Efficiency Investments Standard as )  
Required by Section 532 of the Energy )  
Independence and Security Act of 2007. )

**DOGWOOD ENERGY, LLC'S APPLICATION TO INTERVENE**

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

1. Dogwood is a limited liability company organized and existing under the laws of the State of Delaware and authorized to conduct business in the State of Missouri. Dogwood owns the 625 MW combined cycle generating facility located in Pleasant Hill, Missouri.

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

Carl J. Lumley  
Curtis, Heinz, Garrett & O'Keefe, P.C.  
130 S. Bemiston, Suite 200  
Clayton, Missouri 63105  
(314) 725-8788  
(314) 725-8789 (Fax)  
clumley@lawfirmemail.com

3. On December 15, 2008, Staff of the Missouri Public Service Commission filed a Motion to Establish a Case, Provide Notice and Schedule a Prehearing Conference for the purpose of establishing a record of its consideration and determination of whether or not it is appropriate to implement the "Rate Design Modifications to Promote Energy Efficiency

Investments" Standard established by Section 532 ("Energy Efficiency Programs") of the Energy Independence and Security Act of 2007.

4. On December 17, 2008 the Commission issued its Order Establishing Cases, Directing Notice, Establishing a Deadline for Submission of Intervention Requests, Setting a Prehearing Conference and Setting Date for Filing Procedural Schedules. An intervention deadline date of January 16, 2009 was established.

5. Dogwood seeks to intervene in this proceeding because the Commission's decision could affect Dogwood's interests. Dogwood takes no position at this time pending further investigation.

6. Granting Dogwood's Application 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 Application 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

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Carl J. Lumley, #32869  
130 S. Bemiston, Suite 200  
Clayton, Missouri 63105  
(314) 725-8788  
(314) 725-8789 (Fax)  
clumley@lawfirmemail.com

Attorneys for Dogwood Energy, LLC

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing was emailed, faxed or mailed by U.S. Mail, postage paid, this 19th day of December, 2008, to the persons shown on the attached list.

/s/ Carl J. Lumley

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General Counsel's Office  
Missouri Public Service Commission  
200 Madison Street, Suite 800  
P.O.Box 360  
Jefferson City, Mo 65102  
gencounsel@psc.mo.gov

Lewis Mills  
Office of the Public Counsel  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, MO 65102  
opcservice@ded.mo.gov

Nathan Williams  
Missouri Public Service Commission  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
Nathan.Williams@psc.mo.gov