

In the Matter of The Empire District  
Electric Company's 2013 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 July 1, 2013, The Empire District Electric Company's (Empire) submitted information pursuant to the Commission's Electric Utility Resource Planning (Chapter 22) reporting requirements.

4. Empire's filing includes information developed in conjunction with the advisory group created by agreement made between it and stakeholders including Dogwood regarding its prior triennial IRP submittal (File No. EO-2011-0066). 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 interests. 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

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## CERTIFICATE OF SERVICE

A true and correct copy of the foregoing document was either mailed, faxed, or emailed this 5<sup>th</sup> day of July 2013, to the persons listed on the below service list.

/s/ Carl J. Lumley

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