

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of Evergy Missouri West, Inc.	)	
d/b/a Evergy Missouri West's Request for	)	File No. ER-2022-0130
Authority to Implement a General Rate	)	Tracking Nos. YE-2022-0202
Increase for Electric Service	)	

**MOTION TO INTERVENE OF SIERRA CLUB**

COMES NOW Sierra Club, pursuant to the Commission's January 12, 2022 Order Giving Notice, Setting a Deadline to Intervene, Setting a Deadline to Respond to the Test Year, and Directing a Proposed Procedural Schedule, and 20 CSR 4240-2.075, and for its Motion to Intervene, states as follows:

1. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has more than 800,000 members nationally and over 11,000 members in Missouri, many of whom reside in Evergy's service territory and are Evergy ratepayers. The Missouri Chapter of Sierra Club has an office at 2818 Sutton Blvd, St. Louis, MO 63143; email [Missouri.chapter@sierraclub.org](mailto:Missouri.chapter@sierraclub.org); telephone 314-644-1011.

2. Sierra Club exists for the purpose of preserving and protecting environmental values. Consistent with this mission, Sierra Club has long advocated for transitioning Missouri's electricity sector from coal-fired generation to cleaner and lower cost forms of energy, such as energy efficiency and renewable energy sources. Sierra Club is concerned with emissions of greenhouse gases that cause climate change, and with pollution from non-renewable sources that cause a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, respiratory problems, and other problems. Sierra Club's interest in protecting and enhancing the quality of ambient air and water throughout the state will be favorably affected if

Evergy aggressively pursues renewable energy, energy efficiency, and demand response programs that displace fossil fuel generation, and acts to support widespread transportation electrification through programs and rate designs that lower barriers to electric vehicle adoption.

3. Sierra Club has substantial knowledge and experience in the revenue requirement and rate design issues that are inherent in these dockets. Sierra Club has been a party to many KCP&L, KCP&L-GMO, and Evergy dockets over the last decade, spanning from integrated resource plans to rate cases to transportation electrification cases.

4. Sierra Club's interests focus on environmental protection and hence are different from those of the general public and could be adversely affected by an order approving rate designs or a revenue requirement that disincentivize energy efficiency or conservation, or continued utilization of excess coal-based generating capacity where more prudent and cost-effective alternatives exist, or an order discouraging renewable energy resources or appropriate time-varying rates.

5. Sierra Club is interested in rate design and cost recovery issues and in community solar and other renewable energy investments.

6. Sierra Club is not yet certain of the positions it will take in this case.

7. Correspondence, communications, orders and decisions may be sent to:

Sarah Rubenstein (MO Bar #48874)  
Bruce Morrison (MO Bar #38359)  
Great Rivers Environmental Law Center  
319 N. Fourth Street, Suite 800  
St. Louis, Missouri 63102  
(314) 231-4181  
[srubenstein@greatriverslaw.org](mailto:srubenstein@greatriverslaw.org)  
[bamorrison@greatriverslaw.org](mailto:bamorrison@greatriverslaw.org)

8. It will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, Sierra Club respectfully requests the Public Service Commission grant this Motion to Intervene.

Respectfully Submitted,

/s/ Sarah Rubenstein

Sarah Rubenstein (MO Bar #48874)  
Great Rivers Environmental Law Center  
319 N. Fourth Street, Suite 800  
St. Louis, Missouri 63102  
(314) 231-4181  
[srubenstein@greatriverslaw.org](mailto:srubenstein@greatriverslaw.org)

/s/ Bruce Morrison

Bruce Morrison (Mo. Bar No. 38359)  
Great Rivers Environmental Law Center  
319 N. 4<sup>th</sup> St., Suite 800  
St. Louis, Missouri 63102  
(314) 231-4181  
[bamorrison@greatriverslaw.org](mailto:bamorrison@greatriverslaw.org)

*Counsel for Sierra Club*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 24<sup>th</sup> day of January, 2022, a true and correct copy of the foregoing pleading was filed on EFIS and sent by email to all counsel.

/s/ Sarah Rubenstein

Sarah Rubenstein