BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Evergy Missouri Metro, Inc. d/b/a Evergy Missouri Metro's 2023 Integrated Resource Plan Annual Update Filing)	File No. EO-2023-0212
In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's 2023 Integrated Resource Plan Annual Update Filing)	File No. EO-2023-0213

APPLICATION TO INTERVENE OF THE CITY OF KANSAS CITY AND MOTION FOR EXPEDITED TREATMENT

The City of Kansas City, pursuant to 20 CSR 4240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, and for its Application to Intervene respectfully states as follows:

- 1. The City of Kansas City (the "City") is one of Evergy's largest customers. In August 2022, the Kansas City Climate Protection and Resiliency Plan ("CPRP") was passed by City Council. This plan sets out Kansas City's vision for a healthier, more equitable, and resilient future and includes municipal and community-wide greenhouse gas ("GHG") emissions reduction goals.
- 2. On January 4, 2023 Evergy filed a Motion for Variance to Extend Time to File Resources Plans. That motion was granted and the file was closed on March 17, 2023.
 - 3. On June 15, 2023 Evergy filed its 2023 IRP Annual Update.
- 4. The Commission issued its "Order Recognizing Parties" on June 21, 2023, recognizing all entities previously granted intervention in prior Chapter 22 proceedings pursuant to Rule 20 CSR 4240-22.020(56).
- 5. As the City did not have a position on the Motion for Variance, and the file has been closed until just recently, good cause exists for filing this Application after the initial deadline.
- 6. As Evergy's June 15 filing essentially re-opened the docket, as the Commission just recognized parties, and as no deadlines or other activity has occurred yet in this case, the City's motion is timely. Pursuant to 20 CSR 4240-2.075(10), the City accepts the record established in the case, including the requirements of any orders of the Commission as of the date this motion is filed.

- 7. The City previously filed suggestions of special contemporary issues in File No. EO-2023-0100, In the Matter of a Determination of Special Contemporary Resource Planning Issues to be Addressed by Evergy Missouri, Inc. d/b/a Evergy Missouri Metro in its Next Triennial Compliance Filing or Next Annual Update Report and File No. EO-2023-0101, In the Matter of a Determination of Special Contemporary Resource Planning Issues to be Addressed by Evergy Missouri West, Inc. d/b/a Every Missouri West in its Next Triennial Compliance Filing or Next Annual Report.
 - 8. The City does not yet have a position on the June 15, 2023 filing by Evergy.
- 9. The City seeks to intervene because the Commission's actions herein could affect the City's interests.
- 10. As one of Evergy's largest customers, the City has an interest in this proceeding different from that of the general public.
- 11. The City's intervention will serve the public interest by assisting the record for the Commission's decision in this case.
- 12. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

Stephanie S. Bell Ellinger Bell LLC 308 East High Street, Suite 300 Jefferson City, MO 65101 (573) 750-4100 sbell@ellingerlaw.com

Andrew Bonkowski Assistant City Attorney 414 E 12th Street, 28th Floor Kansas City, MO 64106 (816) 513-3107 Andrew.Bonkowski@kcmo.org

MOTION FOR EXPEDITED TREATMENT

A workshop is currently scheduled in this case for July 6, 2023. The City requests that the Commission expeditiously grant this Motion no later than July 5, 2023, to allow the City's participation in the workshop. By doing so, the Commission will avoid the harm that would be excluding an interested party from a case workshop. There will be no negative effects from the

granting of this Motion. This Motion was filed as soon as it could have been under the circumstances.

WHEREFORE, the City respectfully requests that the Commission expeditiously issue its order granting its Application for Intervention and that it be made a party hereto with all rights to participate in this matter.

Respectfully submitted,

ELLINGER BELL LLC

By: /s/ Stephanie S. Bell

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon all of the parties of record or their counsel, pursuant to the Service List maintained by the Data Center of the Missouri Public Service Commission on June 30, 2023.

/s/ Stephanie S. Bell

Stephanie S. Bell