

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

In the Matter of Evergy Metro, Inc. d/b/a Evergy)	
Missouri Metro’s 2021 Triennial Compliance)	File No. EO-2021-0035
Filing Pursuant to 20 CSR 4240-22)	
)	
AND)	
)	
In the Matter of Evergy Missouri West, Inc. d/b/a)	File No. EO-2021-0036
Evergy Missouri West’s 2021 Triennial)	
Compliance Filing Pursuant to 20 CSR 4240-22)	
)	

APPLICATION TO INTERVENE

COMES NOW, the International Brotherhood of Electrical Workers, Local Union No. 304 (“IBEW Local 304” or “Union”) and petitions the Missouri Public Service Commission (“Commission”) to grant this Application to Intervene in the above-referenced proceedings, pursuant to 4 CSR 240-2.075. In support of its petition, IBEW 304 alleges and states as follows:

1. IBEW 304 is an unincorporated association and voluntary labor organization doing business and representing employees of Evergy working in the States of Kansas, who are often called to duty in the State of Missouri. The Union is also a labor organization as defined in the National Labor Relations Act, as amended, 29 U.S.C. § 152, *et seq.* The Union exclusively represents and bargains for over approximately 1000 Evergy employees, who will be affected by the instant proceedings.

2. The work performed by these employees is directly related to the processes of electrical generation for Evergy customers, and capital expenditures related to the electrical generation and production will have a direct impact on the employees represented by Local 304, and a direct impact on the Union itself.

3. The public interest would be served by granting this Application, as the Union and its members have a clear and significant interest in the outcome of this proceeding, and as the Union and

its members may be adversely affected by the Commission's actions and orders. Moreover, there is no other party to this proceeding that will adequately represent the interests of the Union and its members. Finally, this proceeding will not be impaired should the Union's Application be granted.

4. All correspondence, orders and pleadings filed in the matter should be addressed to:

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5. The Petitioner requests that service be made to the Petitioner and its legal counsel.
6. IBEW Local 304 does not have a position at this time to the proposed Integrated Resource Plan, and respectfully reserves the right to take positions on specific issues as this matter proceeds.

WHEREFORE, International Brotherhood of Electrical Workers, Local Union No. 304 respectfully requests that the Commission sustain this Application to Intervene and that it be granted all rights of a party to this matter.

Respectfully Submitted,

/s/ Brian Noland

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed via EFIS on the 16th day of February, 2021, and emailed to all counsel of record in this matter by EFIS.

/s/ Brian Noland
Attorney for Union-Intervenor