

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

**In the Matter of Evergy Metro, Inc. d/b/a**            )  
**Evergy Missouri Metro’s Request for**            ) **File No. ER-2022-0129**  
**Authority to Implement a General Rate**        ) **Tracking Nos. YE-2022-0200;**  
**Increase for Electric Service**                ) **YE-2022-0201**

**APPLICATION FOR INTERVENTION OF  
MIDWEST ENERGY CONSUMER’S GROUP**

COMES NOW the Midwest Energy Consumer’s Group, 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 for its Application for Intervention in this case, states as follows:

1. Midwest Energy Consumer’s Group (“MECG”) is an incorporated entity representing the interests of large commercial and industrial users of electricity.
2. On January 7, 2022, Evergy Missouri Metro filed proposed tariffs with the Commission intending to increase its rates for electric service. As a corporation representing the interests of large commercial and industrial customers, MECG’s interest in this case is different than that of the general public.
4. For purposes of 40 CSR 4240-2.075(2), MECG states that it is opposed to discriminatory pricing of electricity and related utility services, is opposed to increases that are not reasonable and are not related to prudent costs that are incurred by the utility in providing utility service, and is opposed to a utility being permitted to earn what may be an unreasonably high rate of return. MECG is unable to state its position relating to the relief sought by Evergy. MECG is continuing to review Evergy’s filing and reserves the right to take positions on specific issues as this case proceeds.

5. MECG's intervention will serve the public interest by assisting the record for the Commission's decision in this case.

6. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

David L. Woodsmall, Esq.  
WOODSMALL LAW OFFICE  
308 E. High Street, Suite 204  
Jefferson City, Missouri 65101  
(573) 797-0005  
E-mail: [david.woodsmall@woodsmalllaw.com](mailto:david.woodsmall@woodsmalllaw.com)

WHEREFORE, MECG respectfully requests that the Commission 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,

/s/ David Woodsmall  
David L. Woodsmall, MBE #40747  
308 E. High Street, Suite 204  
Jefferson City, Missouri 65101  
(573) 797-0005  
Internet: [david.woodsmall@woodsmalllaw.com](mailto:david.woodsmall@woodsmalllaw.com)

ATTORNEY FOR THE MIDWEST ENERGY  
CONSUMERS' GROUP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.

/s/ David Woodsmall  
David L. Woodsmall

Dated: January 14, 2022