

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

In the Matter of the Application of Evergy)	
Metro, Inc. d/b/a Evergy Missouri Metro for)	Case No. ET-2021-0151
Approval of a Transportation Electrification)	
Portfolio)	

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

COMES NOW the Midwest Energy Consumer’s Group, pursuant to the Commission’s *Order Directing Notice and Setting Deadlines for Intervention Applications and Staff’s Recommendation*, and for its Application for Intervention in this case, states as follows:

1. Midwest Energy Consumer’s Group (“MECG”) is an incorporated association representing the interests of large commercial and industrial users of electricity.
2. On February 24, 2021, Evergy Metro, Inc. d/b/a Evergy Missouri Metro filed its application requesting the Commission approve a transportation electrification pilot program. As a representative of large commercial and industrial customers of Evergy Missouri Metro, MECG’s interest in this case is different than that of the general public.
4. For purposes of 20 CSR 4240-2.075(2)(F), MECG states that it is opposed to the establishment of rates outside of a rate case or during the rate moratorium established in Section 393.1655.2; and is opposed to the deferral of costs that are not associated with an extraordinary event. Beyond this, MECG is unable to state its position relating to the relief sought by Evergy Missouri Metro. MECG is continuing to review

Evergy Missouri Metro'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

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,



David L. Woodsmall, MBE #40747
308 E. High Street, Suite 204
Jefferson City, Missouri 65101
(573) 797-0005
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.

A handwritten signature in black ink, appearing to read "David L. Woodsmall". The signature is written in a cursive, somewhat stylized font.

David L. Woodsmall

Dated: March 1, 2021