

**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) Case No. EO-2021-0035
Compliance Filing Pursuant to 20 CSR 4240-22.)

**APPLICATION TO INTERVENE OF
THE MIDWEST ENERGY CONSUMERS GROUP**

COMES NOW the Midwest Energy Consumers Group (“Applicants” or “MECG”), pursuant to 20 CSR 4240-2.075 of the Missouri Public Service Commission’s Rules of Practice and, and for its Application to Intervene respectfully states as follows:

1. The Midwest Energy Consumers Group (“MECG”) is an incorporated entity representing the interests of large commercial and industrial users of electricity in the service areas of Missouri public utilities including Evergy Missouri Metro.

2. On August 11, 2020, Evergy filed a motion to open this docket in anticipation of its future submission of information pursuant to the Commission’s Electric Utility Resource Planning (Chapter 22) reporting requirements. On September 8, 2020, the Commission opened this docket as requested by Evergy.

3. The matters to be considered in this case and the Commission’s determinations thereon, could have a direct and significant impact on the future rates charged to Evergy customers including those represented by MECG. Therefore, granting this proposed intervention would serve the public interest and would assist the Commission in development of a more complete record.

3. As a representative of large user customers of Evergy, MECG has a direct and immediate interest in these proceedings that is different from that of the general public. To this point, MECG has been granted intervention in Evergy’s last several rate

proceedings. While MECG does not at this time have sufficient information to assert a position on this investigation, they reserve the right to assert positions after they have had an adequate opportunity to examine the record, and any documentation of other parties filed herein.

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

David L. Woodsmall
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308 East High Street, Suite 204
Jefferson City, MO 65101

WHEREFORE, having stated the grounds for intervention and the position and interest of the Applicants in these proceedings, Applicants ask that the Commission grant this Application for Intervention.

Respectfully submitted,

/s/ David Woodsmall
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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: October 13, 2020