

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

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

In the Matter of Evergy Missouri West, Inc, d/b/a )  
Evergy Missouri West’s Application for Approval ) File No. ET-2021-0269  
Of a Transportation Electrification Portfolio )

**APPLICATION TO INTERVENE OF NATURAL RESOURCES DEFENSE  
COUNCIL**

Comes now the Natural Resources Defense Council (NRDC) and, pursuant to 20 CSR 4240-2.075, applies to intervene herein and become a party for all purposes.

1. NRDC is a nonprofit corporation organized under the laws of New York with a Midwest office at 20 North Wacker Drive, Suite 1600, Chicago, IL 60606; contact Ashok Gupta at that address or at 212-243-4351. It has over 4,800 members in Missouri, many of whom are Evergy Missouri Metro or West ratepayers. NRDC and its members are interested in promoting alternatives to fossil-fuel use in transportation.

2. NRDC seeks to intervene in this proceeding because of its interest in the environmental and consumer benefits of electric vehicles (EVs). EVs eliminate the tailpipe pollution that emanates from gasoline-powered cars and reduce greenhouse gas emissions compared to gasoline cars, especially when they can charge with electricity that contains a higher proportion of renewable generation.

3. NRDC has provided expert testimony on transportation electrification in KCP&L case ER-2016-0285 and Ameren Missouri case ET-2016-0246. While generally

supportive, at this point NRDC does not know what position it will take on the issues in this case.

4. Correspondence, communications, orders and decisions may be sent to the undersigned legal counsel.

5. NRDC has interests different from those of the general public, which could be adversely affected by the decision in this case.

6. It will serve the public interest for NRDC to be allowed to intervene.

WHEREFORE, NRDC respectfully requests the Public Service Commission to grant this application to intervene.

/s/ Henry B. Robertson  
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Attorney for NRDC

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 11th day of March, 2021, to all counsel of record.

/s/Henry B. Robertson  
Henry B. Robertson