BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Approval of a Transportation Electrification Portfolio

Case No. ET-2021-0269

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 Missouri West, Inc. d/b/a Evergy Missouri West filed its application requesting the Commission approve a transportation electrification pilot program. As a representative of large commercial and industrial customers of Evergy Missouri West, 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 West. MECG is continuing to review Evergy Missouri West'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: <u>david.woodsmall@woodsmalllaw.com</u>

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,

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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.

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David L. Woodsmall

Dated: March 1, 2021