## 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 Approval	)	Case No. ET-2021-0151
of a Transportation Electrification Portfolio	)	
In the Matter of the Application of Evergy Missouri	)	
West, Inc. d/b/a Evergy Missouri West for	)	Case No. ET-2021-0269
Approval of a Transportation Electrification Portfolio	)	

## MOTION TO INTERVENE

COMES NOW The Empire District Electric Company ("Liberty") and, pursuant to Missouri Public Service Commission ("Commission") Rule 20 CSR 4240-2.075, respectfully submits this Motion to Intervene in the transportation electrification portfolio dockets of Evergy Metro, Inc. d/b/a Evergy Missouri West, Inc. d/b/a Evergy Missouri West (collectively, "Evergy").

- 1. Liberty is a Kansas corporation with its principal office and place of business at 602 S. Joplin Ave., Joplin, Missouri, 64801. Liberty is qualified to conduct business and is conducting business in Missouri, as well as in the states of Arkansas, Kansas, and Oklahoma. Liberty is a "public utility" and, therefore, is subject to the general regulatory jurisdiction of the Commission as provided by law and is engaged, generally, in the business of generating, purchasing, transmitting, distributing, and selling electricity in portions of the referenced four states.
- 2. Liberty's documents of incorporation from Kansas and certificate of authority from Missouri were previously filed with the Commission in Case No. EF-94-39. These documents are incorporated by reference. Liberty has no overdue Commission annual reports or assessment fees. There is no pending action or final unsatisfied judgment or decision against Liberty from any state or federal agency or court which involves

customer service or rates, which action, judgment or decision has occurred within three

years of the date of this Motion.

3. Pleadings, notices, orders, and other correspondence concerning this matter should be

addressed to the undersigned counsel.

4. Liberty's interests in these cases arise from its status as an electrical corporation

operating in the state of Missouri and, on November 29, 2020, Liberty applied for

approval of a portfolio of transportation electrification pilot programs and accounting

treatment (ET-2020-0390). Decisions in these proceedings could prove precedential to

Liberty's own electrification programs.

5. As such, Liberty's interests are different from the general public and each other party in

the cases, and these interests cannot be adequately represented by any other party. In

addition, granting Liberty's proposed intervention would serve the public interest by

providing the Commission with information and insights based on Liberty's expertise

and unique perspective.

6. At this time, Liberty is reviewing Evergy's initial filings and is unsure of the positions it

will take in these cases.

WHEREFORE, Liberty respectfully requests that the Commission grant its timely Motion

to Intervene and that it be made a party hereto with all rights to participate in these matters.

Respectfully submitted,

/s/ Diana C. Carter

Diana C. Carter MBE #50527

The Empire District Electric Company d/b/a Liberty

428 E. Capitol Ave., Suite 303

Jefferson City, Missouri 65101

Joplin Office Phone: (417) 626-5976

Cell Phone: (573) 289-1961

E-Mail: Diana.Carter@LibertyUtilities.com

## **Certificate of Service**

I hereby certify that the above document was filed in EFIS on this 11<sup>th</sup> day of March, 2021, with a copy sent to all counsel of record.

/s/ Diana C. Carter