

2. Sierra Club participated in the Commission's investigation of utility self-commitment into the RTO day-ahead energy markets, File No. EW-2019-0370 and, specific to Evergy Missouri West, EW-2020-0034. In its "Order Accepting Staff's Report" filed in those dockets on September 18, 2019, the Commission stated at page 2 that "the continued analysis of issues regarding the practice of self-commitments will most appropriately take place within the Fuel Adjustment Clause (FAC) prudence review proceedings, or within a rate case." Sierra Club therefore intends to further analyze and evaluate West's "must run" and other commitment and dispatch practices with regard to its coal-fired plants with an eye to whether ratepayers and the environment may be harmed by these practices and whether the public interest would be better served by the retirement of uneconomical plants.

3. Sierra Club's interest in promoting cleaner and lower cost forms of energy is different from those of the general public and could be adversely affected by an order approving prolonged reliance on aging coal plants. Moreover, Sierra Club's staff and consultants have unique and extensive experience in analyzing the feasibility and cost-effectiveness of coal and its alternatives, including extensive experience evaluating utilities' energy market commitment and dispatch decisions. Sierra Club's intervention would serve the public interest in prudent resource planning, public health, and the curtailment of greenhouse gas emissions.

4. Sierra Club is not yet certain of the position it will take in this case.

5. It will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, Sierra Club respectfully requests the Public Service Commission to grant the application to intervene.

/s/ Henry B. Robertson
Henry B. Robertson (Mo. Bar No. 29502)
Great Rivers Environmental Law Center
319 N. Fourth Street, Suite 800
St. Louis, Missouri 63102
Tel. (314) 231-4181
Fax (314) 231-4184
hrobertson@greatriverslaw.org

Attorney for Sierra Club

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 17th day of March, 2020, to all counsel of record.

/s/ Henry B. Robertson
Henry B. Robertson