

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

APPLICATION TO INTERVENE
OF THE MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION

COMES NOW the Missouri Joint Municipal Electric Utility Commission (“MJMEUC”), by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully files its Application to Intervene in this matter. In support of this Application, MJMEUC states as follows:

1. On August 11, 2020, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“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.

2. MJMEUC is a body corporate and politic of the State of Missouri, organized as a joint municipal utility commission pursuant to section 393.700 *et seq.* RSMo., with authority to exercise public powers of a political subdivision of the state for the benefit of the inhabitants of municipalities jointly contracting to establish the MJMEUC. Sixty-eight Missouri municipalities are current parties to the joint contract establishing the MJMEUC.

3. Correspondence, communications, orders and the decision in this matter should be addressed to:

Douglas L. Healy
Terry M. Jarrett
Healy Law Offices, LLC
514 E. High St., Suite 22

Jefferson City, MO 65101
Telephone: (573) 415-8379
Facsimile: (573) 415-8379
Email: doug@healylawoffices.com
terry@healylawoffices.com

4. MJMEUC serves one municipality that currently has a wholesale power contract with Evergy and five municipalities directly imbedded in Evergy's transmission system that take transmission through the Southwest Power Pool (SPP).

5. MJMEUC is one of five owners, along with Evergy, of the Iatan 2 Generating Plant ("Iatan 2") located at the Iatan Generating Station in Platte County, Missouri.

6. MJMEUC has an interest that is different from that of the general public, in that it represents the interest of municipal electrical systems throughout the state, as well as municipal electric systems directly imbedded in Evergy's transmission system that take transmission through SPP and a municipal electrical system that has a wholesale power contract with Evergy. MJMEUC also has interests in the Iatan-2 generating plan co-owned with Evergy. MJMEUC and its members have direct and immediate interests in this proceeding that are not currently represented in this matter.

7. Granting intervention to MJMEUC would serve the public interest by allowing MJMEUC's experience and insight to be a part of the Integrated Resource Planning process.

8. MJMEUC does not have a position at this time in this case to the proposed Integrated Resource Plan but reserves the right to take positions on specific issues as this case proceeds.

WHEREFORE, MJMEUC respectfully requests that the Commission grant its Application to Intervene on its behalf and on behalf of its members, entitling it to fully participate in this proceeding.

Respectfully submitted,

HEALY LAW OFFICES, LLC



Douglas L. Healy MO Bar 51630
Terry M. Jarrett MO Bar 45663
514 E. High St., Suite 22
Jefferson City, MO 65101
Telephone: (573) 415-8379
Facsimile: (573) 415-8379
Email: doug@healylawoffices.com
terry@healylawoffices.com

Dated: October 13, 2020

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 13th day of October, 2020.



Terry M. Jarrett