

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Third Prudence Review)	
Of Costs Subject to the Commission-Approved)	File No.EO-2020-0263
Fuel Adjustment Clause of Evergy Metro, Inc.,)	
d/b/a Evergy Missouri Metro)	

APPLICATION TO INTERVENE OF SIERRA CLUB

Comes now Sierra Club, and pursuant to 20 CSR 4240-2.075 and the Commission’s “Order Directing Notice” of March 3, applies to intervene herein. In support of its motion to intervene, Sierra Club states the following.

1. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has more than 750,000 members nationally and approximately 12,000 members in Missouri, many of whom reside in Evergy Metro’s service territory and are Metro ratepayers. The Missouri Chapter of Sierra Club has an office at 2818 Sutton Blvd, St. Louis, MO 63143; email john.hickey@sierraclub.org; telephone 314-644-1011. Sierra Club exists for the purpose of preserving and protecting environmental values. Consistent with this mission, Sierra Club for many years has advocated for transitioning Missouri’s electricity sector from coal-fired generation to cleaner and lower cost forms of energy, such as energy efficiency and renewable energy sources. Sierra Club is concerned with emissions of greenhouse gases that lead to global warming, and with pollution from non-renewable sources that cause a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, respiratory problems, and other problems.

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 Metro, EW-2020-0033. 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 Metro’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
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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
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