

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Evergy Missouri)
West, Inc. d/b/a Evergy Missouri West for Approval) Case No. EO-2022-0061
of a Wholesale Energy Market Rate for a Data Center)
Facility in Kansas City, Missouri)

MOTION TO INTERVENE OF GOOGLE LLC AND MOTION FOR EXPEDITED TREATMENT

COMES NOW Google LLC, pursuant to Commission Rules 20 CSR 4240-2.075 and 20 CSR 4240-2.080(14), and files this Motion to Intervene and Request for Expedited Treatment, and in support thereof respectfully states as follows:

INTERVENTION

1. On November 2, 2021, Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy West”) filed an Application for authority to implement a Special High Load Factor Market rate.
2. Google LLC is a limited liability corporation duly incorporated under the laws of the State of Delaware. The Company’s principal office is located at 1600 Amphitheatre Parkway, Mountain View, CA 94043. The contact information for Google LLC’s attorney is set forth below.
3. Evergy West is seeking the Commission’s approval to implement tariffs that authorize and enable a high load factor market rate specifically tailored to provide service to data centers. Google LLC has an interest in potentially developing Data Center Facilities that would take service under a similar tariff that is likely to be filed for the Evergy Missouri Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Metro”) territory. The process by which the Evergy West tariff is approved or not approved, and the final form of the approved tariff, is very likely to have a significant impact on the Evergy Metro tariff, and so Google LLC has an interest in this proceeding different from that of the general public. In addition, Google LLC has experience in acquiring power at market based rates in jurisdictions around the country. By allowing Google LLC’s intervention, the Commission can use that knowledge and experience to decide

the case in a manner that best serves the public interest.

4. Google LLC is generally supportive of the concept of a market based rate tailored to data centers, and may develop positions on specific issues as this case proceeds.

5. Communications, correspondence, orders and decisions in this matter should be addressed to the undersigned.

EXPEDITED TREATMENT

6. In its Application, Evergy West suggests a procedural schedule that includes a Technical Conference on November 10, 2021. Pursuant to 20 CSR 4240-2.080(14), Google LLC requests that the Commission expeditiously grant its Motion to Intervene before the commencement of the first technical or procedural conference. By doing so, the Commission will avoid the harm that would be caused by Google LLC's inability to fully participate in such conference as a party to the case. There will be no negative effects from the granting of this Motion. This Motion was filed as soon as it could have been under the circumstances.

WHEREFORE, Google LLC respectfully requests that the Commission expeditiously issue its order granting intervention and permit Google LLC to intervene and participate as a party in all respects in this proceeding.

Respectfully submitted,

BY: /s/ Lewis Mills
Lewis Mills, MO Bar No. 35275
BRYAN CAVE LEIGHTON PAISNER LLP
221 Bolivar Street, Suite 101
Jefferson City, MO 65101
573-556-6627 – Telephone
573-556-7447 – Facsimile
lewis.mills@bryancave.com

ATTORNEY FOR GOOGLE LLC

