## BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Evergy West, Inc. d/b/a Evergy	)	
Missouri West's Submission of Its 2021 Renewable	)	File No. EO-2022-0286
Energy Standard Compliance Report	)	

## DIVISION OF ENERGY APPLICATION TO INTERVENE

COMES NOW the Missouri Department of Natural Resources – Division of Energy (DE) and, pursuant to Commission Rule 20 CSR 4240-2.075, respectfully requests that the Commission issue its order granting DE's Application to Intervene. For its Application, DE states as follows:

- 1. On April 15, 2022, Evergy West, Inc. d/b/a Evergy Missouri West filed its 2021 Renewable Energy Standard Compliance Report as required by Commission Rule 20 CSR 4240-20.100(8).
- 2. DE is a division of the state agency the Department of Natural Resources, vested with the powers and duties set forth in § 620.035 RSMo. DE's interests are different than those of the general public, as illustrated by its statutory authority to: (1) plan for future energy needs and energy resource development; (2) monitor and analyze all federal, state, local and voluntarily disclosed private sector energy research projects and voluntarily disclosed private sector energy related data and information concerning supply and consumption; (3) develop, promote, administer and monitor energy conservation programs; (4) consult and cooperate with all state and federal governmental agencies, departments, boards and commissions and all other interested agencies and institutions, governmental and nongovernmental, public and private, on matters of energy research and development, management, conservation and distribution; and (5) analyze the potential for increased use of diverse energy sources, energy efficient technologies, and other energy alternatives and make recommendations for the expanded use of such alternate energy

sources and technologies. In addition, § 393.1030.4 RSMo tasks DE with certifying renewable energy resources for purposes of compliance with Missouri's Renewable Energy Standard.

- 3. DE's interest in this matter is due to its statutory role pursuant to § 393.1030 RSMo in certifying renewable energy resources. The Compliance Report filed in this case will assist DE with its review of certified renewable energy resources, consistent with 10 CSR 140-8.010(4)(B). This statutory interest is different from that of the general public.
- 4. DE takes no position on the issues presented, and seeks intervention to serve the above interests.
- 5. Communications, correspondence, orders and decisions in this matter should be addressed to the undersigned.

WHEREFORE, the Division of Energy respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

/s/ Jacob Westen

Jacob Westen, Bar No. 65265

General Counsel

Missouri Department of Natural Resources

P.O. Box 176

Jefferson City, MO 65102

573-751-5464

Jacob.Westen@dnr.mo.gov

**Attorney for the Division of Energy** 

## **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been emailed to the certified service list this 13<sup>th</sup> day of May 2022.

/s/ Jacob Westen