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

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust ts Revenues for Electric Service	) ) )	<b>File No. ER-2021-0240</b> Tracking No. YE-2021-0175
In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust	)	File No. GR-2021-0241
ts Revenues for Natural Gas Service	)	Tracking No. YG-2021-0176

# APPLICATION OF EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST FOR LEAVE TO INTERVENE OUT-OF-TIME

Pursuant to 20 CSR 4240-2.075(10), Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("Evergy Missouri Metro") and Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West") (collectively, "Evergy") seek to intervene out-of-time in the above-captioned dockets. In support of this Application, the Company states:

- 1. Evergy Missouri Metro is a Missouri corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. It is engaged in the generation, transmission, distribution and sale of electricity in western Missouri and eastern Kansas, operating primarily in the Kansas City metropolitan area. Evergy Missouri Metro is an "electrical corporation" and a "public utility" subject to the jurisdiction, supervision, and control of the Commission under Chapters 386 and 393. Evergy Missouri Metro's certificate of good standing was filed in Case No. EN-2020-0063 and is incorporated by reference pursuant to 20 CSR 4240-2.060(1)(G).
- 2. Evergy Missouri West is a Delaware corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. It is engaged in the generation, transmission, distribution and sale of electricity in western Missouri, including the

suburban Kansas City metropolitan area, St. Joseph, and surrounding counties. Evergy Missouri West is an "electrical corporation" and a "public utility" subject to the jurisdiction, supervision and control of the Commission under Chapters 386 and 393. A certificate of authority for a foreign corporation to do business Missouri was filed with the Commission in Case No. EN-2020-0064 and is incorporated by reference pursuant to 20 CSR 4240-2.060(1)(G).

3. In addition to serving counsel named below, all correspondence, pleadings, notices, orders and other communications regarding this proceeding should also be sent to:

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- 4. Evergy seeks party status so that it can participate in Union Electric Company d/b/a Ameren Missouri's ("Ameren") rate cases to increase the electric rates to customers served in its Missouri service area ("Rate Cases").
- 5. Evergy expects to support or not oppose the overall relief requested by Ameren in the Rate Case. If granted intervention, Evergy accepts the procedural schedule that has been established.

6. Although the deadline for interventions in the Rate Cases was April 30, 2021<sup>1</sup>, good cause exists to grant the Evergy's late intervention. Like Ameren, both Evergy Missouri Metro and Evergy Missouri West are engaged in the generation, transmission, distribution and sale of electricity in the State of Missouri and, therefore, Evergy's interest in this proceeding is different from that of the general public. Evergy has recently become aware of issues in the Ameren Rate Cases which have the potential to establish regulatory policies that may directly affect Evergy in the future. In addition, allowing Evergy to participate will assist in creating the record for a Commission decision in this case.

7. Ameren does not object to Evergy Missouri Metro nor Evergy Missouri West being granted intervention in this docket. Evergy's late intervention in this case will not prejudice any other party.

**WHEREFORE**, Evergy respectfully request that the Commission issue an order authorizing it to intervene in the above-captioned matter.

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<sup>&</sup>lt;sup>1</sup> <u>See</u>, Order[s] Giving Notice, Setting A Deadline to Intervene, Setting A Deadline to Respond to the Test Year, and Directing a Proposed Schedule, dated April 2, 2021.

## Respectfully submitted,

## |s| Roger W. Steiner

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### ATTORNEY FOR EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST

#### **CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first class United States Mail, postage pre-paid, to counsel for all parties of record this 14<sup>th</sup> day of June 2021.

|s| Roger W. Steiner

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