

**BEFORE THE PUBLIC SERVICE COMMISSION
FOR THE STATE OF MISSOURI**

In the Matter of the Joint Application of GridLiance)
High Plains LLC, GridLiance GP, LLC, and)
GridLiance Holdco, LP ("GridLiance"), NextEra) Docket No. EM-2021-0114
Energy Transmission Investments, LLC, and NextEra)
Energy Transmission, LLC ("NextEra Entities") for)
Approval of the Acquisition of GridLiance by the)
NextEra Entities)

**PETITION TO INTERVENE OF
EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST**

COMES NOW, 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 referred to herein as “Evergy”) and, pursuant to Rule 20 CSR 4240-2.075, respectfully requests that the Commission grant intervention to Evergy in the above-styled matter. In support of its petition, Evergy states as follows:

1. On October 20, 2020, NextEra Energy Transmission Investments, LLC (“NETI”), and NextEra Energy Transmission, LLC (“NEET”) (collectively, the “NextEra Entities”), as well as GridLiance High Plains LLC (“GridLiance HP”), GridLiance GP, LLC, and GridLiance Holdco, LP (“GridLiance Holdco”) (collectively, the “GridLiance Entities”), together, the “Joint Applicants”) filed an application pursuant to Section 393.190 RSMo, and other applicable statutes, requesting an order disclaiming jurisdiction by the Commission or, in the alternative an order approving the acquisition of GridLiance HP by the NextEra Entities by means of an upstream change of ownership.

2. 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.

3. 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).

4. 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.

5. 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).

6. Evergy Missouri Metro and Evergy Missouri West are wholly-owned subsidiaries of Evergy, Inc. They have no annual reports or regulatory assessment fees that are overdue.

7. Evergy is a transmission-owning member of the Southwest Power Pool, Inc. (“SPP”) Regional Transmission Organization (“RTO”) and owns and operates generation located in the State of Missouri. GridLiance currently is a member of SPP and owns assets under the SPP Tariff. Furthermore, GridLiance’s business model is based in large part on acquiring assets to own, operate, upgrade, and potentially bring under the SPP Tariff for cost recovery purposes including the potential for such projects to be acquired and/or constructed in Evergy’s SPP pricing Zone. As a fellow Member of SPP, Evergy has an interest in current and future costs driven by

GridLiance's operations and any effect the proposed transaction may have on such operations and associated costs.

8. Thus, Evergy has a substantial interest in the outcome of this proceeding that is different than that of the general public and that could be adversely affected by the outcome of this proceeding and, therefore, cannot be represented by any other entity. GridLiance's application has been on file with the Commission for just over one week, and no procedural schedule has yet been ordered by the Commission. As such, the interests of justice and the orderly and prompt conduct of these proceedings will not be impaired by allowing Evergy's intervention. Evergy requests that the Commission grant its petition for intervention and make Evergy a party to this docket with the right to participate fully throughout the proceeding.

9. Evergy is presently unsure what position it will take with respect to the proposed transaction.

10. In addition to signatory counsel, all correspondence, pleadings, notices, orders and other communications regarding this proceeding should also be sent to:

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WHEREFORE, Evergy respectfully requests that the Commission issue an order allowing it to intervene and participate in this docket, and for such further and other relief as may be appropriate.

Respectfully submitted,

/s/ Robert J. Hack

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**Attorneys for Evergy Missouri Metro and
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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, postage prepaid, to counsel for all parties this 28th day of October 2020.

/s/ Robert J. Hack

**Attorney for Evergy Missouri Metro and Evergy
Missouri West**