

**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 an Operating )  
Certificate of Convenience and Necessity related to the ) Case No. EA-2023-0291  
Dogwood Natural Gas Combined-Cycle Electric )  
Generating Facility in Cass, County, Missouri )

**APPLICATION TO INTERVENE**  
**OF THE MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION d/b/a**  
**MISSOURI ELECTRIC COMMISSION**

COMES NOW the Missouri Joint Municipal Electric Utility Commission d/b/a Missouri Electric Commission (“MEC”), by and through its undersigned counsel, pursuant to Commission Rule 4 CSR 4240-2.075, and respectfully files its Application to Intervene in this matter. In support of this Application, MEC states as follows:

1. On November 8, 2023, Evergy Missouri West, Inc. d/b/a Evergy Missouri West filed with the Public Service Commission its Application for an Operating Certificate of Convenience and Necessity (“CCN”) related to its agreement to purchase a 22.2% interest in the Dogwood Natural Gas Combined-Cycle Electric Generating Facility from Dogwood Energy, LLC. The Commission subsequently ordered that applications to intervene are to be filed no later than November 29, 2023. MEC wishes to intervene.

2. MEC is a body corporate and politic of the State of Missouri, organized as a joint municipal utility commission pursuant to section 393.700 *et seq.* RSMo., with authority to exercise public powers of a political subdivision of the state for the benefit of the inhabitants of municipalities jointly contracting to establish the MEC. Seventy-two (72) municipalities are current parties to the joint contract establishing the MEC.

3. Correspondence, communications, orders, and the decision in this matter should be addressed to:

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4. MEC currently owns an undivided 16.4% ownership interest in all the assets, properties, and rights of the Dogwood Natural Gas Combined-Cycle Electric Generating Facility.

5. MEC has an interest that is different from that of the general public in that it is a partial owner of the Dogwood Natural Gas Combined-Cycle Electric Generating Facility. MEC and its members, as partial owners of the facility, have a direct interest in who other potential owners may be, and have immediate interests in this proceeding that are not currently represented in this matter.

6. Granting intervention to MEC would serve the public interest by allowing MEC's experience, interests, and insight to be a part of the CCN process.

7. MEC does not have a position at this time in this case to the proposed CCN but reserves the right to take positions on specific issues as this case proceeds.

8. No party will be prejudiced by MEC's intervention.

WHEREFORE, MEC respectfully requests that the Commission grant its Application to Intervene on its behalf and on behalf of its members, entitling it to fully participate in this proceeding.

Respectfully submitted,

HEALY LAW OFFICES, LLC

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Dated: November 22, 2023

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 22nd day of November, 2023.

/s/ Terry M. Jarrett

Terry M. Jarrett