BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Evergy)	
West, Inc. d/b/a Missouri West for an)	File No. EA-2023-0291
Operating Certificate of Convenience and)	
Necessity related to the Dogwood Natural)	
Gas Combined-Cycle Electric Generating)	
Facility in Cass County, Missouri)	

APPLICATION TO INTERVENE OF THE CITY OF KANSAS CITY

The City of Kansas City (the "City"), pursuant to 20 CSR 4240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, and for its Application to Intervene respectfully states as follows:

- 1. The City is a municipal corporation duly organized, created and existing under and by virtue of the Constitution and Laws of the State of Missouri.
- 2. The City is one of Evergy's largest customers. The City Council of Kansas City adopted the Kansas City Climate Protection and Resiliency Plan on August 25, 2022. The plan sets out the City's vision for a healthier, more equitable, and resilient future and establishes municipal and community-wide greenhouse gas emissions reduction goals.
- 3. Evergy Missouri West, Inc. d/b/a/ Evergy Missouri West ("Evergy") filed an Application for an Operating Certificate and Necessity to authorize Evergy to own, operate, maintain, and otherwise control and manage an existing and operational natural gas-fired, combined-cycle electric generation facility located in Pleasant Hill, Cass County, known as the Dogwood Energy Facility, on November 8, 2023.
- 4. The Commission subsequently issued an order on November 9, 2023 directing that all applications to intervene in this case shall be filed no later than November 29, 2023. The City wishes to intervene in this case.

- 5. As one of Evergy's largest customers, the City has an interest in this case that is different from that of the general public and that interest may be adversely affected by a final order arising from this case.
- 6. The City seeks to intervene in this case because the Commission's actions in this case may affect the City's interests.
- 7. Granting the City's intervention will serve the public interest by assisting the development of the record for the Commission's decision in this case.
- 8. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

Stephanie S. Bell Ellinger Bell LLC 308 East High Street, Suite 300 Jefferson City, MO 65101 (573) 750-4100 sbell@ellingerlaw.com

Andrew Bonkowski Assistant City Attorney 414 E 12th Street, 28th Floor Kansas City, MO 64106 Andrew.Bonkowski@kcmo.org

WHEREFORE, the City respectfully requests that the Commission issues an order granting its Application for Intervention and that it be made a party hereto with all rights to participate in this case.

Respectfully submitted,

ELLINGER BELL LLC

By: /s/ Stephanie S. Bell

Stephanie S. Bell #61855 308 East High Street, Suite 300 Jefferson City, MO 65101

Telephone: 573-750-4100 Facsimile: 314-334-0450 Email: sbell@ellingerlaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon all of	the
parties of record or their counsel, pursuant to the Service List maintained by the Data Center	of
the Missouri Public Service Commission on November 29, 2023.	

/s/ Stephanie S. Bell
Stephanie S. Bell