

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

In the Matter of Evergy Metro, Inc. d/b/a	)	
Evergy Missouri Metro’s 2024 Triennial	)	File No. EO-2024-0153
Compliance Filing Pursuant to 20 CSR	)	
4240-22	)	

In the Matter of Evergy Missouri West,	)	
Inc., d/b/a Evergy Missouri West’s 2024	)	File No. EO-2024-0154
Triennial Compliance Filing Pursuant to	)	
20 CSR 4240-22	)	

**APPLICATION TO INTERVENE OF SIERRA CLUB**

COMES NOW Sierra Club, pursuant to 20 CSR 4240-2.075, and submits this Application to Intervene in the above-captioned cases. For its Application, Sierra Club states as follows:

1. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has roughly 700,000 members nationwide and more than 10,000 members in Missouri, many of whom reside in Evergy Missouri Metro or West service territories and are Evergy ratepayers.

2. Sierra Club exists for the purpose of preserving and protecting environmental values. Sierra Club is concerned with emissions of greenhouse gases that cause climate change, and with pollution from non-renewable sources that cause a host of health issues including asthma, mercury poisoning, sudden infant death syndrome, and respiratory problems, among others. Consistent with this mission, Sierra Club has long advocated for transitioning the electricity sector from coal-fired generation to cleaner and lower cost forms of energy, such as energy efficiency and renewable energy sources. Sierra Club’s interest in protecting and enhancing the quality of ambient air and water throughout the state will be favorably affected if

Evergy aggressively pursues renewable energy, energy efficiency, and demand response programs that displace fossil fuel generation.

3. Sierra Club has been a party to many previous Evergy and KCPL triennial IRP, IRP update, MEEIA, and rate proceedings.

4. Sierra Club's interest in promoting cleaner and lower cost forms of energy is different from that of the general public and could be adversely affected by an order approving prolonged reliance on aging coal plants, inadequate levels of DSM programs, and continued discouragement of renewable generation. Moreover, Sierra Club's staff and consultants have unique and extensive experience in analyzing the feasibility and cost-effectiveness of coal and its alternatives. Sierra Club's intervention would serve the public interest in prudent resource planning, public health, and the curtailment of greenhouse gas emissions.

5. Sierra Club has not yet determined the positions it will take in this case.

6. It will serve the public interest for the Commission to grant this motion to intervene.

7. Correspondence, communications, orders and decisions may be sent to:

Sarah Rubenstein (MO Bar #48874)  
Great Rivers Environmental Law Center  
319 N. Fourth Street, Suite 800  
St. Louis, Missouri 63102  
(314) 231-4181  
[srubenstein@greatriverslaw.org](mailto:srubenstein@greatriverslaw.org)

WHEREFORE, Sierra Club respectfully requests the Public Service Commission grant this Application to Intervene.

Respectfully Submitted,

*/s/ Sarah Rubenstein*

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*Counsel for Sierra Club*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12<sup>th</sup> day of January, 2024, a true and correct copy of the foregoing pleading was filed on EFIS and sent by email to all parties of record.

*/s/ Sarah Rubenstein*

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Sarah Rubenstein