

**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 Compliance Filing     )  
Pursuant to 20 CSR 4240-22            )

Case No. EO-2024-0153

In the Matter of Evergy Missouri        )  
West, Inc., d/b/a Evergy Missouri       )  
West’s 2024 Triennial Compliance       )  
Filing Pursuant to 20 CSR 4240-22      )

Case No. EO-2024-0154

**APPLICATION TO INTERVENE OF THE CITY OF KANSAS CITY**

The City of Kansas 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 follow:

1. The City of Kansas City (the “City”) is one of Evergy’s largest customers. In August 2022, the Kansas City Climate Protection and Resiliency Plan (“CPRP”) was passed by City Council. This plan sets out Kansas City’s vision for a healthier, more equitable, and resilient future and includes municipal and community-wide greenhouse gas (“GHG”) emissions reduction goals.

2. On November 3, 2013, Evergy filed a Motion to Open New Dockets for Triennial Compliance Filings. That motion was granted and the file was opened on November 30, 2023.

3. Commission Rule 20 CSR 4240-22.020(56) defines “Stakeholder Group” as including any entity granted intervention in a prior Chapter 22 proceeding of the electric utility. That regulation also provides that such entities are to be parties to any subsequent related Chapter 22 proceeding of

the electric utility without the necessity of applying to intervene in the subsequent case.<sup>1</sup>

4. The City was a party to the 2023 Annual Updates of Evergy Metro, Inc. and Evergy Missouri West, Inc. (collectively, “Evergy”) in Case Nos. EO-2023-0212 and EO-2023-0213, respectively. Accordingly, the City should be recognized as a party to the above-captioned cases without an application to intervene.

5. The City seeks to intervene because the Commission’s actions herein could affect the City’s interests.

6. As one of Evergy’s largest customers, the City has an interest in this proceeding different from that of the general public.

7. 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

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<sup>1</sup> See also, Order Recognizing Parties, Case No. EO-2023-0212 (June 21, 2023).

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

Marc H. Ellinger, #40828

Stephanie S. Bell, #61855

308 East High Street, Suite 300

Jefferson City, MO 65101

Telephone: 573-750-4100

Facsimile: 314-334-0450

Email: mellinger@ellingerlaw.com

Email: sbell@ellingerlaw.com

*Attorneys for The City of Kansas City*

**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 this January 16, 2024.

/s/ Stephanie S. Bell

Stephanie S. Bell