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)	File No. EO-2024-015		
Filing Pursuant to 20 CSR 4240 – Chapter 22)			
)			
)			
In the Matter of Evergy Missouri West Inc., d/b/a)			
Evergy Missouri West's 2024 Triennial Compliance)	File No. EO-2024-0154		
Filing Pursuant to 20 CSR 4240 – Chapter 22)			

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 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 3, 2023, 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 "Evergy") filed a Motion to Open New Dockets for Triennial Compliance Filings with the Commission providing they would make their respective triennial Integrated Resource Plan ("IRP") filings as required by the Commission's Electric Utility Resource Planning (4 CSR 4240-22) reporting requirements. The Commission issued an order opening these dockets on November 30, 2023. No order specifying an intervention deadline has yet been issued, however, MEC wishes to intervene and participate in the proceedings.
- 2. MEC is a body corporate and politic of the State of Missouri, organized as a joint municipal utility commission pursuant to the Joint Municipal Utility Commission Act, section

393.700 *et seq.* RSMo., to obtain sufficient, economical electrical power supply, energy management, and transmission services for the benefit of member municipal utilities. MEC provides full power purchase requirements to member utilities and arranges purchases for members in need of supplemental power. Each member is represented on the Board of Directors by city-appointed director and alternate director with voting privileges. MEC membership includes 72 municipal utilities in Missouri, and 4 advisory members in Arkansas.

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

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- 4. MEC is a member, transmission owner, market participant, and transmission customer in the Southwest Power Pool and has both load and resources that are located in the Evergy transmission pricing zones in Missouri.
- 5. MEC has an interest that is different from that of the general public, in that it represents the interests of its member municipal electrical systems throughout the state, including municipal electric systems directly imbedded in Evergy's transmission system that take

transmission through SPP. MEC and its members have direct and 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 and insight to be a part of the IRP process.

7. MEC does not have a position on the proposed IRP at this time but reserves the

right to take positions on specific issues as this case progresses.

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: January 19, 2024

3

CERTIFICATE OF SERVICE

	I hereby	certify that	copies o	of the fo	regoing	have been	mailed,	emailed,	or hand-	delivered
to all pa	arties on	the official	service 1	ist for t	his case	on this 19 ^t	^h day of	January,	2024.	

/s/ Terry M. Jarrett
Terry M. Jarrett