

**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 Permission and Approval of)	
Certificates of Convenience and Necessity)	File No. EA-2024-0292
Authorizing It to Construct, Install, Own,)	
Operate, Manage, Maintain and Control)	
Two Solar Generation Facilities)	

APPLICATION TO INTERVENE OF SIERRA CLUB

COMES NOW Sierra Club, pursuant to the Commission's October 30, 2024 Order Directing Notice, Setting Intervention Deadline, and Directing Staff Recommendation, and 20 CSR 4240-2.075, and submits this Application to Intervene in the above-captioned case. 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 over 610,000 members nationwide and more than 9,000 members in Missouri, many of whom reside in Evergy's service territory 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 and gas-burning generation to cleaner and lower cost forms of energy, such as energy efficiency, renewable energy sources, and energy storage. 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 projects that will 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 unreasonable resource planning decisions that prolong reliance on aging coal-burning plants and discourage a transition to renewable generation. Sierra Club's intervention in this docket would serve the public interest in promoting prudent resource planning, public health, and the reduction of greenhouse gas emissions.

5. Sierra Club has not yet determined the positions it will take in this case because discovery is necessary to help form such positions. Accordingly, Sierra Club expects to conduct and analyze discovery, after which it will decide whether to submit testimony that will articulate its position(s) on discrete issues.

6. 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

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

Respectfully Submitted,

/s/ Sarah Rubenstein

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

Counsel for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of November, 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

Sarah Rubenstein