BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of Evergy Missouri West, Inc. d/b/a Evergy Missouri West and Evergy Metro, Inc. d/b/a Evergy Missouri Metro for Permission and Approval of a Certificate of Public Convenience and Necessity for Natural Gas Electrical Production Facilities

File No. EA-2025-0075

SIERRA CLUB'S APPLICATION TO INTERVENE

COMES NOW Sierra Club, pursuant to the Commission's November 19, 2024 Order Directing Notice, Setting an Intervention Deadline, and Directing Staff to File a Pleading, 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 606,728 members nationwide and more than 8,300 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 fossil fuel-burning electric generating sources that contribute to 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 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 Kansas City Power and Light matters brought before the Public Service Commission, including Triennial Integrated Resource Planning ("IRP") dockets, IRP updates, Missouri Energy Efficiency Investment Act dockets, and rate cases.

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. Sierra Club's participation in this proceeding will also aid the public interest and the Commission's decision in this matter through development of a robust factual record.

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

2

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

<u>CERTIFICATE OF SERVICE</u>

I hereby certify that on this 19th day of December, 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