## **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

## <u>APPLICATION TO INTERVENE OF</u> MIDWEST ENERGY CONSUMERS GROUP

COMES NOW, the Midwest Energy Consumers Group, ("MECG") and pursuant to 20 CSR 4240-2.075, applies to intervene in the above case. For its Application, MECG states:

1. Midwest Energy Consumers Group ("MECG") is an incorporated entity representing the interests of large commercial and industrial users of electricity.

2. On November 15, 2024, Evergy Missouri Metro and Evergy Missouri West filed an application with the Commission requesting a Certificate of Convenience and Necessity ("CCN") related to owning, operating, and constructing multiple natural gas generation plants located in Missouri and Kansas. In addition, Evergy seeks certain special accounting treatment related to the projects within this application. The matters to be considered in this case and the Commission's determinations thereon will have a direct and significant impact on the cost of service of Evergy Missouri's large commercial and industrial customers.

3. As a representative of large user customers of Evergy Missouri West and Evergy Missouri Metro, the MECG has a direct and immediate interest in these proceedings that is different from that of the general public. While MECG does not at this time have sufficient information to assert a position on this petition, including whether or not the project satisfies the Commission's "tartan" factors, it reserves the right to assert positions after they have had an adequate opportunity to examine the record, and any documentation of other parties filed herein. At this time, MECG states that it opposes the special accounting treatment sought by the company to the extent it unreasonably distorts the balance between the utilities and their customers. MECG anticipates being able to assert positions on other issues identified throughout this case in its position statements that may be required in a procedural schedule.

4. MECG's intervention will serve the public interest by assisting the record for the Commission's decision in this case.

5. Pleadings, notices and other correspondence in this case should be directed to undersigned counsel.

WHEREFORE, MECG respectfully requests that the Commission issue its order granting its Application to Intervene and that it be made a party hereto with all rights to participate in this matter.

Respectfully,

<u>/s/ Tim Opitz</u> Tim Opitz, Mo. Bar No. 65082 Opitz Law Firm, LLC 308 E. High Street, Suite B101 Jefferson City, MO 65101 T: (573) 825-1796 tim.opitz@opitzlawfirm.com

ATTORNEY FOR MIDWEST ENERGY CONSUMERS GROUP

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 19<sup>th</sup> day of December 2024:

/s/ Tim Opitz