

**BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Evergy Missouri West, Inc.)	
d/b/a Evergy Missouri West’s Request for)	File No. ER-2024-0189
Authority to Implement a General Rate)	
Increase for Electric Service)	

**CLARKSDALE PUBLIC UTILITIES COMMISSION’S
RESPONSE TO STAFF’S AND EVERGY’S OPPOSITION TO
APPLICATION TO INTERVENE REGARDING A
PARTICULAR ISSUE**

The Clarksdale Public Utilities Commission (“CPUC”), hereby responds to Staff’s and Evergy’s December 30, 2024 opposition to CPUC’s 20 CSR 4240-2.075 *Application to Intervene* in the above referenced case regarding Issue No. 5 “Crossroads” as identified in the “Unanimous Stipulation and Agreement” filed herein on October 2, 2024, and incorporated by reference at Pages 5 and 11 of this Commission’s Report and Order issued December 4, 2024, effective December 14, 2024.

Neither Staff nor Evergy dispute these three key facts:

(1) CPUC – *not Evergy* – owns the properties forming the Crossroads Project, which consists of the Crossroads Project Generation, title to which is in the City of Clarksdale, Mississippi, and the Crossroads Project Transmission, title to which is in the Mississippi Delta Energy Agency (“MDEA”), with CPUC in its individual capacity acting as agent for MDEA;

(2) CPUC had no timely legal notice of either this general rate case or the possibility that this “general rate case” would purport to conclude with a Report and Order that authorizes a “Demobilization Study...which will evaluate the cost, procedures and schedule of relocating Crossroads....”¹; and

(3) The Report and Order establishes an 11-month open docket and open record of evidence regarding this “Crossroads Issue” that continues through November 7, 2025.

¹ Opposition of Evergy Missouri West to Clarksdale Public Utilities Commission’s Application to Intervene, Par. 1.

Given these three undisputed facts, Staff's and Evergy's purely procedural opposition to CPUC's intervention begs many questions, some of which may not be within this Commission's jurisdiction. For example, what harm will be done by involving the actual owner of the assets at issue in the process and study of "the cost, procedures and schedule" of relocating those assets? What harm might be done to CPUC if it learns, after Evergy deigns to share the "completed" study², that CPUC's assets have been de-valued by the study? Why did Staff and Evergy permit this Commission to issue its Report and Order under the mistaken belief that Evergy owns the assets at issue? Will the costs of a "demobilization study" ever reasonably be borne by ratepayers when that study was done over the objection and/or without the support of the owner of the assets? Have CPUC and Evergy already contractually agreed that the assets at issue will remain in Mississippi? Does Mississippi law, rather than Missouri law, govern this "Crossroads Issue"?

Permitting CPUC – as a person entitled to be heard given the above undisputed facts – to now intervene in this case regarding this "Crossroads Issue" will best protect the time and resources of this Commission and all interested parties.

WHEREFORE, the Clarksdale Public Utilities Commission requests that it be granted intervention as requested herein.

Respectfully submitted,

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² Opposition of Evergy Missouri West to Clarksdale Public Utilities Commission's Application to Intervene, Par. 16.

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Dated: December 31, 2024

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 31st day of December, 2024.

/s/ Peggy A. Whipple

Peggy A. Whipple