

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

In the Matter of the Application of Evergy Metro,)
Inc. d/b/a Evergy Missouri Metro and Evergy)
Missouri West, Inc. d/b/a Evergy Missouri West) File No. EE-2025-0084
Request for a Waiver of Various Chapter 13)
Regulations)

Renew Missouri’s Application to Intervene Out of Time

COMES NOW Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”), and pursuant to 20 CSR 4240-2.075, applies to intervene out of time, for good cause shown, in the above-captioned case. For its *Application to Intervene Out of Time* Renew Missouri states:

1. Renew Missouri is a non-profit corporation organized under the laws of Missouri with its principal place of business at 915 East Ash St, Columbia, MO 65201. Renew Missouri is a registered fictitious name of Renew Missouri Advocates under § 417.200, RSMo. Renew Missouri is a non-profit policy group whose mission is to transform Missouri into a leading state in renewable energy and energy efficiency. Renew Missouri’s policy goals including supporting the transition to more reliance on renewable energy, as well as energy efficiency efforts that encourage energy savings, decreased reliance on fossil fuel generation, and increased affordability. As advocates for renewable energy and energy efficiency efforts in Missouri, Renew Missouri’s interests are different than those of the general public and may be adversely affected by a final order arising from this case if policies hindering those efforts are adopted.

2. Furthermore, Renew Missouri can assist the Commission by providing information on energy burden and utility rate affordability, which directly ties into disconnection rates. For instance, Renew Missouri has launched an *Energy Burden Explorer*, for the St. Louis area. The *Energy Burden Explorer* is an interactive map that displays energy burden data by census tract, utilizing real utility data from Ameren Missouri alongside modeled data. For this analysis, energy

burden is defined as the percentage of a household's income spent on utility bills annually. Renew Missouri is undertaking similar efforts in the Kansas City area. This work can help inform the Commission in determining best practices in disconnection procedures and balancing the utility's interest in cost saving measures with customers' rights to proper notice in situations involving discontinuation of essential services.

3. Renew Missouri has good cause to intervene out of time. Although a party to the last rate case, Evergy mailed direct notice of the application to parties representing residential customers, and Renew Missouri, not being a consumer advocate group, did not receive this notice. Renew Missouri was alerted to this proceeding by interested parties in the energy burden and utility rate affordability sector, who themselves are not typically formal participants in utility cases before the Commission but had concerns that such voices would not be able to participate in the proceeding. Upon learning this information, and expeditiously could be accomplished under the circumstances, Renew Missouri files this intervention request.

4. Renew Missouri's request is not intended to delay or prejudice the parties to this proceeding. Renew Missouri states it will take the case as is, including all proceedings that have occurred, including the establishment of the deadline for a recommendation.

WHEREFORE, Renew Missouri respectfully requests that the Commission finds that good cause exists to grant Renew Missouri's *Application to Intervene Out of Time*, so Renew Missouri may be able to participate in the proceedings.

Respectfully,

/s/ Nicole Mers

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GENERAL COUNSEL FOR RENEW
MISSOURI ADVOCATES

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 4th day of March 2025.

/s/ Nicole Mers