

**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 Request for a Waiver of Various)	Case No. EE-2025-0084
Chapter 13 Regulations)	

**EVERGY MISSOURI METRO’S AND EVERGY MISSOURI WEST’S OPPOSITION
TO RENEW MISSOURI’S APPLICATION TO INTERVENE OUT OF TIME**

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“EMM”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“EMW”) (collectively the “Evergy” or the “Company”) and, for its *Opposition to the Renew Missouri’s Application to Intervene Out of Time* (“Opposition”), states as follows:

1. On January 17, 2025, the Company filed its *Application for Variances* (“Application”) and direct testimony in support. In addition to filing the Application and supporting testimony with the Missouri Public Service Commission (“Commission”) the Company complied with the requirements of 20 CSR 4240-13.065(2).¹

2. On February 6, 2025, the Commission issued its *Order Directing Notice and Establishing Time for Responses* (“Order”), which set a deadline of February 20, 2025, for any applications to intervene.

3. On March 5, 2025, Renew Missouri (“Renew Missouri”) filed its *Application to Intervene Out of Time* (“Intervention”), nearly two weeks after the deadline set by the Commission’s Order.

¹ “8. As provided for in 20 CSR 4240-13.065(2), Evergy has mailed, contemporaneously with the filing of this Application, a copy of this Application by first class mail to the newspaper with the largest circulation in each county within the utility’s service area affected by the variance, the public counsel, and each party in the utility’s most recent rate cases (File No. ER-2024-0189 and ER-2022-0129), who represented residential customers.” *Application*, p. 3.

4. For the reasons stated herein, Renew Missouri’s Intervention should be denied.

5. First, Renew Missouri has not stated “good cause” as required by 20 CSR 4240-2.075(10) for failure to file a timely application to intervene. Evergy’s Application has been on file with the Commission since January 17, 2025, and available for review by Renew Missouri for approximately 47 days. As a sophisticated party that regularly practices before the Commission, Renew Missouri should have been aware that the Commission’s regulations for variance cases do not require that specific notice be given to non-residential participants in Evergy’s last rate case.² Nonetheless, the Application has been available in EFIS for review since its filing. The fact that Renew Missouri did not receive specific notice of the Application is no excuse for its failure to comply with the Commission's order that “Any person or entity wishing to intervene shall file an application to intervene no later than February 20, 2025.”³

6. Second, Renew Missouri has not expressed an interest in this variance case that “is different from that of the general public and which may be adversely affected by a final order arising from the case” as required by 20 CSR 4240-2.075(3)(a). Renew Missouri has failed to demonstrate or otherwise explain how this variance case has any adverse impact upon the “advocacy for renewable energy and energy efficiency efforts in Missouri.” (Intervention, p. 1, para. 1). This case has nothing to do with renewable energy or energy efficiency programs.

7. Renew Missouri asserts that it “can assist the Commission by providing information on energy burden and utility rate affordability” (Intervention, p. 2 para. 2), but this case does not in any way address “energy burden” or “utility rate affordability” issues. As a result,

² 20 CSR 4240-13.065(2) states: “A utility filing an application for a variance with the commission shall mail, contemporaneously with the filing, copies of the application by first class mail to the newspaper with the largest circulation in each county within the utility’s service area affected by the variance, the public counsel and each party in the utility’s most recent rate case who represented residential customers.”

³ *Order Directing Notice and Establishing Time for Responses*, File No. EE025-0084 (issued February 6, 2025).

the information that Renew Missouri suggests that it will present to the Commission is not relevant to the issues raised by Evergy's Application.

8. As explained in Evergy's Application, this case involves the following:

13. Consequently, the Company requests variances that will allow Evergy to utilize the remote disconnect/reconnect capabilities of the AMI-SD meters already deployed by the Company in parts of its Missouri service territory. This will reduce costs for all Missouri customers through lower operating costs and lower service fees because it eliminates the cost associated with going to the customer residence to disconnect service when technology does not require it. As Company witness Dragoo testifies, the benefits of remote disconnect and reconnect are significant and include better employee safety, less customer fraud, increased scam prevention, reduced theft risk, more cost savings, faster response times, improved communication, and increased operational efficiency.⁴

9. Renew Missouri apparently intends to use this case to develop "an interactive map that displays energy burden data by census tract" in the Kansas City area. (Intervention, p. 1, para. 2). While such an effort may be of use in other contexts, it is unlikely to be helpful to the Commission in evaluating Evergy's Application in this case. In fact, the time necessary to develop such an interactive map is more likely to substantially delay the Commission's ability to process this case in a timely manner. Such a delay would be contrary to the public interest and should not be countenanced by the Commission.

WHEREFORE, Evergy Missouri Metro and Evergy Missouri West respectfully request that the Commission deny Renew Missouri's Application to Intervene Out of Time.

⁴ Application, p. 4, para. 13.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorneys for Evergy Missouri Metro and Evergy
Missouri West**

CERTIFICATE OF SERVICE

A copy of the foregoing has been served this 11th day of March 2025 upon counsel for all parties of record in this proceeding via electronic service or U.S. mail postage prepaid.

/s/ Roger Steiner

Roger W. Steiner