

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the Evergy Metro, Inc. d/b/a  
Evergy Missouri Metro and Evergy Missouri West,  
Inc. d/b/a Evergy Missouri West for Permission and  
Approval of Certificates of Convenience and Necessity  
Authorizing them to Construct, Install, Own, Operate,  
Manage, Maintain, and Control a Natural Gas Production  
Facility and a Battery Energy Storage System

Case No. EA-2026-0343

**MOTION TO INTERVENE OF THALIA ALICIA INSCO**

1. COMES NOW Thalia Alicia Insko ("Insko"), appearing pro se, and pursuant to 20 CSR 4240-2.075 respectfully moves the Missouri Public Service Commission ("Commission") for an order granting her intervention in Case No. EA-2026-0343.

2. Insko is a natural person and a resident and property owner in Buchanan County, Missouri. Her street and mailing address is 11210 State Route H SE, Agency, Missouri 64401. Her email address is sewenchantingequine@gmail.com and her telephone number is (816) 262-9036.

3. Insko personally owns the property at that address. Sew Enchanting Equine Quilt Shop operates on the property. The property is used both as her residence and in connection with her small business.

4. In this case, Evergy seeks authority, among other relief, to construct the Buchanan Bluffs Energy Center Unit 2, a proposed 710-megawatt combined-cycle natural-gas-fired electric generating plant in Buchanan County, Missouri.

5. Insko understands that a separate Buchanan Bluffs generating unit, referred to as Unit 1, is also proposed in the same immediate area. Insko does not contend in this Motion that Unit 1 is the generating facility for which a certificate is sought in this case. Rather, the existence of another proposed generating unit in the same area is relevant to her concern about the potential cumulative impacts of large natural-gas generating facilities near her home, property, business, and surrounding rural community.

6. Based on Insko's measurement of the location, the proposed Buchanan Bluffs facilities are approximately 3.2 miles from her residence and property. Because of that close proximity, Insko has a direct and substantial interest in the Commission's decision that is different from the interest of the general public.

7. Insko is concerned that construction and operation of Buchanan Bluffs Unit 2 may adversely affect her residence, property, business, and use and enjoyment of her property. Her concerns include potential effects involving noise, construction and operational traffic, water resources, property value, the rural character of the surrounding area, and the future use and development of her property.

8. Insko is also concerned about potential air-quality and public-health impacts on her family, customers, employees, and surrounding community. Fossil-fuel-fired electric generation can emit nitrogen oxides and particulate pollution, and nitrogen oxides can contribute to formation of ground-level ozone and fine particulate matter. Exposure to elevated levels of ozone and fine particles has been associated with adverse respiratory and cardiovascular effects. Insko requests that the Commission carefully consider the potential air-quality and public-health impacts of the proposed Unit 2 facility, as well as any relevant cumulative impacts associated with other large generating facilities proposed in the immediate area.

9. Insko seeks intervention so that she may receive case information, participate in the proceeding, present relevant information concerning potential localized impacts, and protect her individual interests as the case proceeds. Her interests may be adversely affected by a final order because her home, personally owned real property, and business are located in close proximity to the proposed generating facility.

10. Granting intervention will serve the public interest by allowing the Commission to receive information from a nearby property owner and small-business owner concerning potential localized impacts of the proposed project.

11. Insko presently **opposes the relief sought to the extent it would authorize construction and operation of the Buchanan Bluffs Energy Center Unit 2**. She reserves the ability to refine her position as additional evidence and information are developed in this proceeding.

12. This Motion is timely because the Commission established September 17, 2026, as the deadline for applications to intervene in this case.

**WHEREFORE**, Thalia Alicia Insko respectfully requests that the Commission grant this Motion to Intervene, make her a party to Case No. EA-2026-0343, add her to the appropriate service list, and grant such other and further relief as the Commission deems just and proper.

Respectfully submitted,

/s/ Thalia Alicia Insko

**Thalia Alicia Insko, Pro Se**

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### **CERTIFICATE OF SERVICE**

I certify that on September 15, 2026, a true and correct copy of the foregoing Motion to Intervene was served upon all parties of record in Case No. EA-2026-0343 by electronic service through the Commission's Electronic Filing and Information System (EFIS) and/or by electronic mail, as applicable.

/s/ Thalia Alicia Insko

Thalia Alicia Insko