

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 for Certificates of Convenience and Necessity.

Case No. EA-2026-0343

APPLICATION FOR INTERVENTION - Case No. EA-2026-0343

Joseph Leslie, the Applicant, an individual property owner, pursuant to the Commission's Rules of Practice and Procedure at 4 CSR 240-2.075, respectfully submits this Application for Intervention in Case No. EA-2026-0343. In support of this application, the Applicant states as follows:

1. Applicant Identity and Contact Information: Applicant is an individual residing and owning real property at 6930 SE Ajax Rd, Saint Joseph, MO 64507. All electronic notices, pleadings, and correspondence regarding this proceeding should be directed to the Applicant at this address and the email associated with the filing user account.
2. Direct and Unique Interest: Applicant's property sits in close geographic proximity to the proposed 170-acre site for the approximately 710-megawatt Buchanan Bluffs Energy Center near Frazier, Missouri. Because of this immediate proximity, the Applicant possesses a direct, distinct, and substantial interest in the outcome of this proceeding that is different from that of the general public.

The proposed facility is a large-scale, continuously operating combined-cycle natural gas generating facility. Evergy's filing also states that Unit 2 will be co-located with and developed jointly with the essentially identical Buchanan Bluffs Energy Center Unit 1, with the two facilities sharing significant infrastructure. The potential impacts to neighboring properties should therefore be considered based on the operation of the overall Buchanan Bluffs generating site.

3. Stance on Development and Scope of Interest: Applicant explicitly notes that this intervention is not intended to arbitrarily obstruct necessary infrastructure development, regional energy reliability efforts, or economic progress in Buchanan County. Rather, Applicant's intervention is specifically focused on ensuring that such progress does not needlessly degrade the surrounding rural environment, agricultural land quality, quality of life, or local property values.

The Applicant recognizes that the Commission must consider the need for reliable electric generation and that Evergy has identified Buchanan Bluffs Energy Center as an important component of its future generation plans. The Applicant does not seek to prevent development simply because it is industrial in nature. The Applicant seeks reasonable, measurable, and enforceable protections for the property owners who will live with the facility every day.

4. Specific Concerns and Requested Mitigations: A massive, continuously operating industrial facility of this scale introduces immediate concerns for the rural character of the area through continuous industrial noise, including potential low-frequency noise, intensive artificial night lighting, visual impacts, and other effects associated with a large generating facility.

Evergy's public filing indicates that certain detailed operating and maintenance plans will not be finalized until closer to the facility's commercial operation date. The Applicant therefore requests that the Commission establish appropriate environmental and property-owner protections as conditions of any Certificate of Convenience and Necessity before the project proceeds to construction.

To preserve the surrounding rural area and protect affected land values from these disruptions, the Applicant seeks to participate as a party to ensure that Evergy is required to implement comprehensive, state-of-the-art mitigation measures, including but not limited to:

- **Acoustic Shielding and Monitoring:** The enforcement of specific property-line sound limits, industrial-grade exhaust silencers, acoustic enclosures around major noise-producing equipment, and other measures appropriate to the equipment and necessary to achieve the required property-line sound limits.
- **Specific Noise Limits:** As a condition of any Certificate of Convenience and Necessity, sound levels measured at affected property lines should not exceed 50 dBA during daytime hours (7:00 a.m. to 8:00 p.m.) or 45 dBA during nighttime hours (8:00 p.m. to 7:00 a.m.). These limits should apply to the combined operational noise of the Buchanan Bluffs generating facilities and associated equipment where the facilities operate together.
- **Low-Frequency and Tonal Noise:** Compliance should not be determined solely by an overall dBA measurement. Testing should also evaluate low-frequency and tonal noise to ensure that compliance with an overall sound limit does not permit an intrusive, continuous low-frequency industrial hum or other prominent tonal noise.

- **Baseline Noise Testing:** Independent third-party acoustic measurements should be conducted before construction begins to establish existing ambient conditions at representative locations on and near affected neighboring properties. This baseline should be preserved for comparison with future operational measurements.
- **Light Pollution Prevention:** The mandate of comprehensive Dark-Sky-compliant lighting practices, low-Kelvin LED fixtures where appropriate, fully shielded and downward-directed security fixtures, and smart motion-sensor zones to minimize unnecessary artificial skyglow and light trespass.
- **Specific Light-Trespass Limit:** As a condition of operation, nighttime light trespass measured at neighboring property lines should not exceed 0.1 foot-candles, except where a greater level is demonstrated to be necessary for an identified safety requirement and specifically approved as part of the facility's lighting plan.
- **Protection of Neighboring Properties:** Exterior lighting should be designed and installed to prevent direct illumination of neighboring homes, yards, agricultural areas, and other properties to the greatest extent practicable.
- **Pre-Construction Lighting Analysis:** Evergy should be required to provide photometric modeling of proposed exterior lighting before construction so that potential light trespass onto neighboring properties can be identified and mitigated before the facility becomes operational.
- **Post-Construction Verification:** Independent field measurements should be conducted after construction and during normal operation to demonstrate compliance with the established light-trespass limits.
- **Visual and Environmental Buffers:** The requirement of substantial earthen sound berms and dense, mature evergreen buffers along the facility perimeter to shield neighboring properties from visual and auditory impacts.
- **Cumulative Site Impacts:** Because Evergy's filing indicates that Buchanan Bluffs Energy Center Unit 1 and Unit 2 will be co-located and will share significant infrastructure, mitigation and compliance testing should account for the combined effects of both facilities and associated equipment rather than evaluating Unit 2 independently.
- **Additional Mitigation:** Additional applicable mitigation measures should be adopted as necessary, and the measures identified above should not be considered an exhaustive final list.

5. Mandatory Testing and Public Transparency Requirements: To ensure these mitigation measures remain functional and effective over the operational lifespan of the facility, Applicant requests that any granted Certificate of Convenience and Necessity be explicitly conditioned upon a strict testing and transparency framework. Specifically, Evergy must be required to:

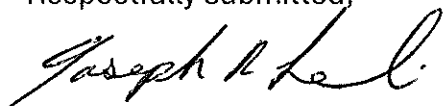
- **Regular Compliance Testing:** Conduct independent, third-party acoustic and light-trespass testing at the facility's property lines on a regular, recurring interval, no less than quarterly during the first two years of operation and bi-annually thereafter. Testing should capture data during peak operational output and under varying seasonal and atmospheric conditions.
- **Noise Testing:** Acoustic testing should measure overall sound levels in dBA and include appropriate evaluation of low-frequency and tonal noise. Testing locations should include property-line locations most likely to experience noise impacts from the facility.
- **Full Operational Conditions:** Testing should include periods when the generating facilities are operating at or near maximum practical output and should not be limited to periods of reduced operation or favorable conditions.
- **Lighting Testing:** Light-trespass testing should measure nighttime illumination at affected property lines using appropriate photometric equipment and methodology to determine compliance with the requested 0.1 foot-candle maximum.
- **Public Reporting:** All raw data, testing methodologies, and final compliance reports from these regular testing intervals should be promptly uploaded and publicly posted to a transparent, easily accessible public database or dedicated online portal. This will provide accountability to the Commission and the neighboring community of Buchanan County whenever operational noise or light thresholds are exceeded.
- **Corrective Action:** If testing demonstrates that established noise or light limits have been exceeded, Evergy should be required to identify the cause, implement corrective measures, and conduct follow-up testing to demonstrate compliance, within 60 days of complaints or discovery, whichever occurs first.
- **Continuing Compliance:** Compliance with the established noise and light limits should be an ongoing condition of operation and not merely a requirement to be demonstrated once after construction.

6. Public Interest: Applicant's participation will serve the public interest by providing a localized, first-hand perspective on the real-world environmental, structural, quality-of-life, and transparency impacts facing the immediate community, adjacent residents, and local stakeholders near the proposed site, a perspective not fully represented by the general public or existing utility parties.

The Applicant respectfully requests that the Commission enter an order granting this Application for Intervention, awarding the Applicant full party status, and allowing the Applicant to actively monitor and participate in all subsequent proceedings, negotiations, and eventual stipulations in this matter.

Dated: September 15, 2026

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joseph R Leslie". The signature is fluid and cursive, with the first name "Joseph" and last name "Leslie" clearly distinguishable.

Joseph R Leslie

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