

**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 Permission and Approval of Certificates of Convenience and Necessity Authorizing Them to Construct, Install, Own, Operate, Manage, Maintain, and Control Electric Production Facilities
Case No. EA-2026-0343

APPLICATION TO INTERVENE OF JOY BUDINE

COMES NOW Joy Budine, appearing pro se, and respectfully submits this Application to Intervene. In support, she states as follows:

INTRODUCTION

1. Joy Budine ("Intervenor"), appearing pro se, respectfully applies to intervene in this proceeding pursuant to 20 CSR 4240-2.075.
2. This proceeding concerns the application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (collectively, "Evergy") for Certificates of Convenience and Necessity, including authority to construct, own, operate, manage, maintain, and control the proposed Buchanan Bluffs Energy Center Unit 2 in Buchanan County, Missouri.
3. The Missouri Public Service Commission has described Buchanan Bluffs Energy Center Unit 2 as an approximately 710-megawatt combined-cycle natural-gas-fired electric generating facility. The Commission established September 17, 2026 as the deadline for applications to intervene in Case No. EA-2026-0343.

INTERVENOR AND PARTICULARIZED INTEREST

4. Joy Budine resides at 10790 Walkup Road SE, Agency, Missouri 64401. Her telephone number is (816) 351-1091 and her email address is thejoyoflearningcenter@gmail.com.
5. Mrs. Budine owns and teaches at The Joy of Learning Farm School, located on her property. More than 30 students are present on the property each school day.
6. The Joy of Learning Farm School property is approximately 1.8 miles from the proposed Buchanan Bluffs facility, based on information provided by Mrs. Budine.
7. Because Mrs. Budine owns and operates a school in close proximity to the proposed facility and has more than 30 students present on the property each school day, her interests are direct, substantial, and different from those of the general public.
8. Construction and operation of a large generating facility in this area could affect Mrs. Budine's use and enjoyment of her property, operation of the school, students and staff on the property, traffic conditions, noise, air quality, water resources, safety, and the rural character of the surrounding area.

THE JOY OF LEARNING FARM SCHOOL AND STUDENT CONCERNS

9. The Joy of Learning Farm School is not merely a residence near the proposed site. It is an operating school where more than 30 students are present each school day.

10. Mrs. Budine therefore has a particular interest in whether construction and operation of Unit 2 could create increased heavy-vehicle traffic, construction traffic, operational traffic, noise, lighting, or other conditions that could affect the school's daily activities and the safety and well-being of students, teachers, staff, and families using the property.

11. Mrs. Budine respectfully requests that the Commission consider the proximity of the school and the number of children regularly present when evaluating the proposed location, construction impacts, operational impacts, mitigation measures, and whether the requested certificate is in the public interest.

WATER SUPPLY AND WATER RESOURCES

12. Mrs. Budine is concerned about the proposed facility's water requirements and the potential effects of those requirements on water resources serving the surrounding rural community.

13. Reliable water availability is particularly important to the daily operation of a school, including drinking water, sanitation, cleaning, and other ordinary school needs.

14. Mrs. Budine respectfully requests that the Commission fully evaluate the amount of water Unit 2 would require; the proposed source or sources of that water; the reliability and capacity of the necessary water infrastructure; and whether the project's construction or operation could adversely affect water availability, reliability, or other water resources in the surrounding area.

15. Mrs. Budine further requests that any approval include appropriate safeguards and enforceable conditions necessary to protect surrounding residents, farms, businesses, and the school from unreasonable water-related impacts.

AIR QUALITY AND HEALTH-RELATED CONCERNS

16. Mrs. Budine is concerned about air emissions associated with a natural-gas-fired combustion turbine facility located approximately 1.8 miles from a property where more than 30 students are present each school day.

17. The United States Environmental Protection Agency identifies stationary combustion turbines as sources of hazardous air pollutants such as formaldehyde, toluene, benzene, and acetaldehyde. EPA also recognizes children as a population at increased risk from ozone exposure.

18. Mrs. Budine does not contend that any particular adverse health effect will necessarily occur at The Joy of Learning Farm School. Rather, the close proximity of a school with children present every school day gives her a direct and substantial interest in the Commission's consideration of expected emissions, applicable emission controls, monitoring, compliance requirements, and appropriate mitigation.

19. Mrs. Budine respectfully requests that the Commission consider whether the proposed project's air quality protections, monitoring, and mitigation are adequate in light of the school's proximity and the regular presence of children.

NOISE, TRAFFIC, SAFETY, AND QUALITY OF LIFE

20. Mrs. Budine is concerned about construction and operational noise and whether it could interfere with the quiet rural setting in which the school operates and students learn.

21. Mrs. Budine is also concerned about increased construction and operational traffic on nearby rural roads. Because students, parents, teachers, staff, visitors, and local residents use roads in the area, she has a direct interest in traffic volume, heavy-truck movements, road safety, construction routing, and appropriate traffic mitigation.

22. Mrs. Budine is further concerned about lighting, emergency response, environmental impacts, property use and value, and changes to the rural character of the area resulting from the proposed facility.

SITE SUITABILITY AND PUBLIC INTEREST

23. The proposed location's proximity to The Joy of Learning Farm School is relevant to the Commission's evaluation of site suitability and the public interest.

24. Mrs. Budine respectfully requests that the Commission fully consider residential and school proximity, water availability, air emissions, noise, traffic and road safety, environmental impacts, emergency and safety considerations, reasonable alternatives, and appropriate protective conditions before authorizing Unit 2 at the proposed location.

25. Intervention will permit Mrs. Budine to present information and concerns arising from her particular circumstances as a nearby property owner, school owner, and teacher, and will assist the Commission in developing a complete record.

POSITION ON THE RELIEF REQUESTED

26. Mrs. Budine opposes the relief requested insofar as it would authorize Buchanan Bluffs Energy Center Unit 2 at the proposed location.

27. Mrs. Budine reserves the right to refine or supplement her position as additional evidence, testimony, studies, and information become available in this proceeding.

28. Mrs. Budine seeks to participate fully in this case as permitted by the Commission's rules, including receiving filings and notices and presenting appropriate evidence, argument, or comment concerning issues affecting her interests.

NO UNDUE DELAY OR PREJUDICE

29. This application is timely under the Commission's September 17, 2026 intervention deadline.

30. Granting intervention will not unduly delay or prejudice the proceeding and will permit the Commission to hear from a nearby property owner and school operator whose interests may be directly affected by the requested certificate.

WHEREFORE, Joy Budine respectfully requests that the Missouri Public Service

Commission: A. Grant her Application to Intervene in Case No. EA-2026-0343;

B. Permit her to participate as a party in this proceeding and receive all filings, notices, orders, and other service required by the Commission's rules;

C. Fully evaluate the effects of the proposed Buchanan Bluffs Energy Center Unit 2 on The Joy of Learning Farm School and the surrounding community, including water resources, air quality, noise, traffic and safety, environmental impacts, property use, and site suitability;

D. Deny authorization for Unit 2 at the proposed location unless Everyg satisfies the Commission that the requested certificate meets applicable legal requirements and is in the public interest, or alternatively impose reasonable conditions, safeguards, monitoring, and mitigation necessary to protect affected persons and properties; and

E. Grant such other and further relief as the Commission deems just and proper.

Respectfully submitted,

/s/ Joy Budine

Joy Budine, Pro Se

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CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2026, the foregoing Application to Intervene was filed electronically through the Missouri Public Service Commission's Electronic Filing and Information System (EFIS), which provides notice and service to parties and representatives of record in this case as provided by the Commission's procedures.

/s/ Joy Budine

Joy Budine

REFERENCES

Missouri Public Service Commission, Case No. EA-2026-0343 docket and September 17, 2026 intervention deadline.

U.S. Environmental Protection Agency, Stationary Combustion Turbines: National Emission Standards for Hazardous Air Pollutants (NESHAP).

U.S. Environmental Protection Agency, Health Effects of Ozone Pollution.