

**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	)	Case No. EA-2026-0343
For Permission and Approval of Certificates of	)	
Convenience and Necessity Authorizing them to	)	
Construct, Install, Own, Operate, Manage,	)	
Maintain, and Control Natural Gas and Solar	)	
Electrical Production Facilities and a Battery	)	
Energy Storage System	)	

In support of this Application, Applicant states as follows:

1. Applicant.

Applicant Kathleen Watkins, a Missouri resident and homeowner/property owner at 10950 State Route E, Agency MO 64401.

2. Direct proximity to proposed facility.

Applicant's residence is located approximately 200 yards from the proposed Evergy natural-gas-fired electric generating facility that is the subject of this proceeding. The proposed facility would therefore be located immediately across from, and in close proximity to, Applicant's home and property.

3. Distinct and substantial interest.

Applicant has a direct, substantial, and individualized interest in this proceeding that is different from that of members of the general public because Applicant's home and property are located approximately 200 yards from the proposed facility.

4. Potential adverse effects.

Because of the extraordinary proximity of Applicant's residence to the proposed facility, Applicant may be directly affected by matters associated with the construction and operation of the proposed facility, including, without limitation, noise, construction activity, traffic, lighting, visual impacts, air emissions, safety concerns, emergency response considerations, property impacts, and other environmental or operational effects that may result from the project.

5. Property and residential impacts.

Applicant is particularly concerned about the potential effects of placing a large natural-gas-fired electric generating facility approximately 200 yards from Applicant's residence,

including the potential impact on the use, enjoyment, character, and value of Applicant's property.

6. Need for participation in the proceeding.

Applicant seeks intervention so that Applicant may receive notice of filings, participate in discovery and hearings as permitted by the Commission, present evidence concerning the direct impacts of the proposed facility on Applicant and Applicant's property, cross-examine witnesses as permitted, and otherwise participate fully in the proceeding.

7. Position regarding Evergy's application.

Applicant opposes the requested authorization to construct and operate the proposed facility at the proposed location because of the facility's extremely close proximity to Applicant's residence and the potential direct impacts described above.

8. Issues Applicant intends to investigate.

Without limiting the issues that may arise during this proceeding, Applicant intends to investigate and present evidence concerning:

- a. the suitability of the proposed site and its proximity to existing residences;
- b. potential noise levels and compliance with applicable requirements;
- c. air emissions and potential effects on surrounding residents;
- d. safety risks associated with a large natural-gas-fired generating facility located approximately 200 yards from a residence;
- e. fire, explosion, emergency-response, and evacuation considerations;
- f. construction-related noise, dust, traffic, and other impacts;
- g. nighttime lighting and visual impacts;
- h. impacts on surrounding residential property and property values;
- i. whether reasonable alternative sites or configurations were considered;
- j. whether adequate setbacks, buffers, mitigation measures, and safeguards are proposed; and
- k. whether the proposed facility and location satisfy the applicable requirements for a Certificate of Convenience and Necessity.

9. Grounds for intervention.

Section 20 CSR 4240-2.075, grants the Commission the power to grant intervention when a proposed intervenor has an interest different from that of the general public that may be adversely affected by a final order. Applicant's residence and property are approximately 200 yards from the proposed facility, giving Applicant a direct and individualized interest in this proceeding.

10. Timeliness.

Applicant is filing this Application within the intervention period established by the Commission.

11. Participation.

Applicant requests the same rights and protections afforded to other parties in this proceeding, subject to the Commission's rules and orders.

12. Other Requested Relief

Deny the CCN for the Buchanan Bluffs Energy Center at the proposed site and grant such other and further relief as the Commission deems just and reasonable.

Respectfully submitted,

/s/ Kathleen Watkins
10950 State Route E
Agency, Missouri 64401
816-262-2859
kkathywatkins@yahoo.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that true and correct copies of the foregoing Application to Intervene have been served by electronic mail to all parties on the service list of record in Case No. EA-2026-0343, this 16 day of September, 2026.

/s/ Kathleen Watkins
Kathleen Watkins