

**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 JANET MOREY AND BROOKE TABER

COMES NOW Janet Morey and Brooke Taber, appearing pro se, and respectfully submits this Application to Intervene. In support, they state as follows:

INTRODUCTION

1. Janet Morey and Brooke Taber ("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. Janet Morey owns the family farm located at 11411 SE MT Moriah RD, GOWER, MO 64454 which borders the Southern boundary of the proposed Buchanan Bluffs facility in Buchanan County, Missouri. Her telephone number is (660) 483-0569, her mailing address is 2777 State Route P, King City, MO 64463 and her email address is timjanmorey@outlook.com.
5. Brooke Taber also has interest in this case as she is the daughter and sole beneficiary of the property at 11411 SE MT Moriah RD, GOWER, MO 64454.
6. Because Ms. Morey owns property which borders the proposed facility, her interests are direct, substantial, and different from those of the general public and may require individual representation in these proceedings.

7. Construction and operation of a large generating facility in this area could affect Ms. Morey and her family's use and enjoyment of her property, traffic conditions, noise, air quality, water resources, safety, and the rural character of the surrounding area.

9. Ms. Morey 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 safety and well-being of her family using their property.

10. Six generations of Ms. Morey's family have resided in the Frazier community, a community she cares deeply about, and she respects the value of this rural agricultural community. Ms. Morey respectfully requests that the Commission consider the proximity of her family farm and all of the other family farms, residences and businesses in the area 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

11. Ms. Morey is concerned about the proposed facility's water requirements and the potential effects of those requirements on water resources serving the surrounding rural community.

12. Reliable water availability is particularly important to the neighboring farms ability to grow crops, raise livestock, for wildlife and clean and safe drinking water for the people living around this area.

13. Ms. Morey 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.

14. Ms. Morey further requests that any approval include appropriate safeguards and enforceable conditions necessary to protect surrounding residents, farms, and businesses from unreasonable water-related impacts.

AIR QUALITY AND HEALTH-RELATED CONCERNS

15. Ms. Morey is concerned about air emissions associated with a natural-gas-fired combustion turbine facility bordering her property.

16. The United States Environmental Protection Agency identifies stationary combustion turbines as sources of hazardous air pollutants such as formaldehyde, toluene, benzene, and acetaldehyde. There is an Early Learning School within close proximity to this proposed facility, and the EPA recognizes that children as a population are at increased risk from ozone exposure

17. Ms. Morey does not contend that any particular adverse health effect will necessarily occur, but with her farm bordering the proposed facility it gives her a direct and substantial interest in

the Commission's consideration of expected emissions, applicable emission controls, monitoring, compliance requirements, and appropriate mitigation.

18. Ms. Morey would like to see evidence and any information of the defined maximum permitted NOx emissions from Unit 1 and 2 tons per year and pounds per hour. As well as an ozone model of the plume radius.

19. Ms. Morey respectfully requests that the Commission consider whether the proposed project's air quality protections, monitoring, and mitigation are adequate.

NOISE, TRAFFIC, SAFETY, AND QUALITY OF LIFE

20. Ms. Morey is concerned about construction and operational noise and whether it could interfere with the quiet rural setting with her farm bordering the proposed facility.

21. Ms. Morey is also concerned about increased construction and operational traffic on nearby rural roads. Because her farm is adjacent, she has a direct interest in traffic volume, heavy-truck movements, road safety, construction routing, and appropriate traffic mitigation.

22. Ms. Morey is concerned about increased traffic hazards on State Route E during construction and daily operational phases. Route E is a narrow, hilly roadway with multiple blind spots, intersecting roads, and private driveways, making it ill-suited for heavy traffic or multi-shift employee commutes.

23. Ms. Morey 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.

24. Ms. Morey is seriously concerned regarding potential long-term health risks resulting from plant emissions, environmental hazards, as well as its effects on wildlife, livestock, farming, crops, and significant potential depreciation of property values affecting her family farm.

SITE SUITABILITY AND PUBLIC INTEREST

25. The proposed facilities location's proximity to Ms. Morey's family farm is relevant to the Commission's evaluation of site suitability and the public interest.

26. Ms. Morey respectfully requests that the Commission fully consider residential, commercial and farms 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.

27. Intervention will permit Ms. Morey to present information and concerns arising from her particular circumstances as an adjoining property owner and will assist the Commission in developing a complete record.

POSITION ON THE RELIEF REQUESTED

28. Ms. Morey opposes the relief requested insofar as it would authorize Buchanan Bluffs Energy Center Unit 2 at the proposed location.

29. Ms. Morey reserves the right to refine or supplement her position as additional evidence, testimony, studies, and information become available in this proceeding.

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

31. Ms. Morey currently Opposes the authorized construction and operation of the Buchanan County Bluffs Energy Center Unit 2. Wherefore, Janet Morey and Brooke Taber request that the Commission grant this Motion to Intervene, make her a party to Case No. EA-2026-0343.

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 whose interests may be directly affected by the requested certificate.

WHEREFORE, Janet Morey and Brooke Taber respectfully request 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 her family farm 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 Evergy 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/ Janet Morey

/s/ Brooke Taber

Janet Morey, Pro Se

Brooke Taber, Pro Se

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CERTIFICATE OF SERVICE

I hereby certify that on September 17, 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/ Janet Morey /s/ Brooke Taber

Janet Morey Brooke Taber

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.