

**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 Natural Gas and Solar Electrical Production Facilities
and a Battery Energy Storage System

Case No. EA-2026-0343

APPLICATION TO INTERVENE

COMES NOW Jason Lee Lewis and Erin Danielle Lewis (“intervenor”), residents and property owners located at 11150 State Route E SE Agency, Missouri 64401, and pursuant to Missouri Public Service Committee Rule 20 CSR 4240-2.075, respectfully submit this Application to Intervene in the above-captioned proceeding. In support thereof, Intervenor state as follows:

In support of this Application to Intervene, Jason Lewis and Erin Lewis state as follows:

IDENTIFICATION OF THE PROCEEDING

1. Evergy Metro, Inc., d/b/a Evergy Missouri Metro, and Evergy Missouri West, Inc., d/b/a Evergy Missouri West (collectively, “Evergy” or “Applicants”), have filed an application with the Missouri Public Service Commission seeking Certificates of Convenience and Necessity (“CCNs”), including authorization relating to the proposed Buchanan Bluffs Evergy Center Unit 2 in Buchanan County, Missouri.
2. Buchana Bluffs Energy Center Unit 2 is proposed as an approximately 710-megawatt combined-cycle-natural-gas electric generating facility in Buchanan County, Missouri

INTERVENORS’ INTEREST AND BASIS FOR INTERVENTION

3. Intervenor Jason Lee Lewis and Erin Danielle Lewis reside at 11150 Sate Route E SE, Agency, MO 64401. Their telephone number is 816-694-1816 and their email address is edlewis328@gmail.com
4. Intervenor’s home and property are located approximately 0.5 miles, or approximately one-half miles, from the proposed Buchanan Bluffs Energy Center Unit 2 site.

5. Because of this immediate proximity, Intervenor's have a substantial and direct interest in the Commission's determination concerning this proposed facility. Intervenor's interest in this proceeding is materially different from that of a member of the general public because of the direct and site-specific effects the proposed facility may have on their home, property, family, neighborhood, and daily life.
6. The proposed facility is not a distant or abstract infrastructure project and would fundamentally change the environment, character, safety, and quality of life of the area in which they live.
7. Intervenor's particular concerns include potential impacts associated with construction and operational noise, increased traffic, air quality and emissions, nighttime lighting, safety, environmental impacts, property values, water supply, and the overall character and quality of life of the surrounding rural residential community.

WATER SUPPLY AND INFRASTRUCTURE CONCERNS

8. Intervenor's are deeply concerned about whether the existing local public water infrastructure has the capacity to reliably provide the substantial water needs associated with a 710-megawatt natural-gas generating facility.
9. Concerns have been raised regarding whether the existing water system has adequate capacity to serve the proposed facility while continuing to reliably serve the existing residents and customers of the district.
10. Due to proximity of Intervenor's home and property to proposed facility they have a direct interest in ensuring that the Commission fully evaluates the amount of water required for construction and operation of the proposed facility, the source and reliability of that water supply, the infrastructure necessary to provide it, and whether the project's water demands could adversely affect existing residents or local water resources. A project of this magnitude should not be approved without demonstrating that its water requirements can be met without jeopardizing the reliability, affordability, or availability of essential water service to the residents and businesses already served by the local water district.

RESIDENTIAL PROXIMITY AND QUALITY OF LIFE

11. Intervenor's residence is approximately 0.50 miles from the proposed facility. Accordingly, concerns regarding noise, lighting, traffic, emissions, construction activity, visual impacts, safety, and other operational impacts are not merely generalized concerns. They involve potential impacts occurring in the immediate vicinity of Intervenor's home and property.

12. Intervenors are concerned about the potential continuous or recurring operational noise associated with a large generating facility, as well as construction noise and activity during the development of the project.
13. Intervenors are also concerned about increased construction and operational traffic on roads serving the surrounding community and the potential effects of that traffic on residents living near the proposed facility.
14. Intervenors have a direct interest in the Commission's consideration of potential air-quality and environmental impacts associated with the proposed facility and the adequacy of measures proposed to mitigate impacts upon nearby residents.
15. Intervenors are further concerned about potential effects upon the value, use, enjoyment, and rural residential character of their property resulting from the construction and operation of a large industrial generating facility approximately one-half mile away.

HEALTH AND AIR-QUALITY CONCERNS

16. Intervenors are concerned about potential health and air-quality impacts associated with living approximately 0.50 miles, or one-half mile, from the proposed approximately 710-megawatt natural-gas generating facility.
17. The United States Environmental Protection Agency ("EPA") regulates stationary combustion turbines under the Clean Air Act. EPA has identified stationary combustion turbines as major sources of hazardous air pollutants, including formaldehyde, toluene, benzene, and acetaldehyde.
18. EPA recognizes health concerns associated with exposure to particulate matter and ground-level ozone. EPA states that particulate pollution can affect the lungs and cardiovascular system and has been associated with aggravated asthma, decreased lung function, respiratory symptoms, irregular heartbeat, nonfatal heart attacks, and premature death in people with heart or lung disease. EPA further recognizes that ground-level ozone can inflame and damage airways, cause coughing and shortness of breath, and aggravate respiratory diseases such as asthma.

19. EPA identifies certain populations as being at increased risk from some forms of air pollution, including children, older adults, individuals with asthma, and individuals who are active outdoors.
20. Intervenors do not contend in this Application that any particular adverse health effect will necessarily occur at their residence as a result of the proposed facility. Rather, because their home and property are located approximately 0.50 miles from the proposed facility, Intervenors have a direct and particularized interest in ensuring that the Commission considers anticipated emissions and air-quality impacts, applicable pollution-control technologies, monitoring requirements, and measures intended to protect residents living in close proximity to the proposed facility.
21. Intervenors respectfully request that the Commission consider whether the proposed pollution-control, monitoring, and mitigation measures are adequate to protect nearby residents and whether additional safeguards or conditions would be appropriate if a Certificate of Convenience and Necessity is granted for Buchanan Bluffs Energy Center Unit 2.

SITE SUITABILITY

22. Given the proximity of Intervenors' home and other residences to the proposed facility, Intervenors have a direct interest in whether the proposed site is appropriate for a generating facility of this size and nature.
23. Intervenors respectfully request that the Commission fully consider the suitability of the proposed location, including residential proximity, availability, and reliability of water resources and necessary infrastructure, traffic and road impacts, environmental and air-quality considerations, and reasonable alternatives evaluated during the site-selection process.
24. Intervenors further request that the Commission consider whether adequate measures have been proposed to protect nearby landowners from potential construction and operational impacts if the proposed facility is approved.

INTERVENORS' INTEREST IS DIFFERENT FROM THAT OF THE GENERAL PUBLIC

25. Missouri Public Service Commission Rule 20 CSR 4240-2.075 provides that the Commission may 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 arising from the case, or when granting intervention would serve the public interest.
26. Intervenors satisfy this standard because their residence and property are located approximately 0.50 miles from the proposed facility. Their interests as immediately neighboring residents and property holders are therefore particularized and materially different from those of members of the general public who do not live or own property near the proposed facility.
27. The Commission's ultimate determination regarding whether to authorize construction and operation of the proposed facility at this location may directly affect Intervenors' property, their use and enjoyment of their home, and the conditions of the immediate area in which they reside.

POSITION OF INTERVENORS

28. Intervenors oppose the relief sought by Applicants insofar as it would authorize construction and operation of Buchanan Bluffs Energy Center Unit 2 at the proposed location.
29. Intervenors seek the opportunity to participate fully in this proceeding, receive notice of filings and proceedings, review information relevant to the proposed project, present evidence or information as permitted by the Commission, respond to matters affecting their interests, and otherwise exercise the rights afforded to parties in this proceeding.

INTERVENTION WILL NOT UNDULY DELAY OR PREJUDICE THE PROCEEDINGS

30. Intervenors' participation will not unduly broaden the issues, cause unnecessary delay, or prejudice any party. The matters identified by Intervenors – including residential proximity, water resources, noise, traffic, air quality, potential health and environmental impacts, site suitability, property impacts, and appropriate mitigation – relate directly to their particularized interests in the proposed facility.
31. This Application to Intervene is timely filed within the interventional deadline established by the Commission for Case No. EA-2026-0343.

PRAYER FOR RELIEF

WHEREFORE, Jason Lee Lewis and Erin Danielle Lewis respectfully request that the Missouri Public Service Commission:

- A. Grant this Application to Intervene and permit Jason Lee Lewis and Erin Danielle Lewis to participate as parties in Case No. EA-2026-0343;
- B. Consider Intervenors' particularized interests as residents and property holders located approximately 0.50 miles from the proposed Buchanan Bluffs Energy Center Unit 2 facility;
- C. Fully consider issues concerning residential proximity, water-supply adequacy and reliability, noise, traffic, air quality and emissions, potential health and environmental impacts, safety, property impacts, site suitability, and the use and enjoyment of nearby residential property when determining whether to grant the requested CCN;
- D. Deny the requested CCN for Buchanan Bluffs Energy Center Unit 2 at the proposed location or, alternatively, if the Commission approves the facility, impose such reasonable conditions, safeguards, monitoring requirements, and protections as the Commission determines appropriate to address impacts upon Intervenors and other nearby residents; and
- E. Grant such other and further relief as the Commission deems just and reasonable.

Respectfully submitted,

/s/ Jason Lee Lewis

Jason Lee Lewis, Pro Se

/s/ Erin Danielle Lewis

Erin Danielle Lewis, Pro Se

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Application to Intervene was served electronically through the Missouri Public Service Commission's Electronic Filing and Information System and/or upon the parties on the service list for Case No. EA-2026-0343 on this 17th day of September, 2026.

/s/ Jason Lee Lewis
Jason Lee Lewis

/s/ Erin Danielle Lewis
Erin Danielle Lewis