

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Case No. EA-2026-0343

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

APPLICATION TO INTERVENE OF JASON ANTHONY INSCO

COMES NOW Jason Anthony Insko, appearing pro se, and pursuant to Commission Rule 20 CSR 4240-2.075 respectfully submits this Application to Intervene in Case No. EA-2026-0343.

1. Applicant Information

Jason Anthony Insko
10600 SE 95th Rd
Agency, Missouri 64401
Telephone: 816-383-0441
Email: Jason.insco@gmail.com

2. Interest in the Proceeding

Jason Anthony Insko owns an approximately **80-acre parcel of property located at 10600 SE 95th Rd, Agency, Missouri 64401, approximately 1.7 miles from the proposed Buchanan Bluffs Energy Center site.**

Because Mr. Insko owns substantial property in close proximity to the proposed facility, his interests are different from those of the general public and may be adversely affected by a final order in this case.

Mr. Insko's concerns include potential impacts to his property and its use and enjoyment, human health, air quality, groundwater and surface water, private wells and nearby water resources, noise, increased traffic, safety, surrounding agricultural operations, and the overall rural environment and quality of life.

3. Property, Agricultural, and Cattle Concerns

Mr. Insko is particularly concerned about the potential effects that construction and long-term operation of a large natural-gas-fired generating facility could have on his approximately 80-acre property and the surrounding rural and agricultural community.

Although Mr. Insko does not personally own cattle, **his property is surrounded by agricultural properties where cattle are raised.** Cattle and livestock production are an important part of the immediate surrounding area.

Because of the proposed facility's proximity to these properties, Mr. Insko believes potential effects on neighboring livestock and agricultural land warrant careful examination.

His concerns include potential changes in air quality, water availability and water quality, groundwater conditions, pasture and forage conditions, noise, lighting, traffic, stormwater runoff, and other environmental changes associated with construction and long-term operation of the proposed facility.

Mr. Insko respectfully requests that the Commission consider available scientific evidence concerning whether emissions or other environmental effects associated with the proposed facility could affect nearby cattle, livestock, pasture, forage, soil, or agricultural water sources.

He further requests consideration of appropriate baseline testing and ongoing monitoring of air and water conditions so that any future changes affecting surrounding properties, agricultural land, or livestock can be identified and evaluated.

4. Water Resources

Water availability and water quality are of particular concern to Mr. Insko because his property is approximately **1.7 miles from the proposed facility** and is situated within a rural agricultural area.

Mr. Insko respectfully requests that the Commission carefully examine the proposed facility's anticipated water consumption and source of water; potential effects on groundwater and private wells; potential effects on ponds, streams, and other nearby water resources; water demand during drought or other periods of limited water availability; wastewater management and disposal; stormwater runoff; and measures intended to prevent contamination or degradation of surrounding water resources.

Mr. Insko also requests consideration of baseline water testing and appropriate continuing monitoring so that existing water conditions can be documented before operation of the proposed facility.

5. Human Health and Air Quality Concerns

Mr. Insko is concerned about the potential effects of the proposed facility on the health and well-being of his family and other residents of the surrounding rural community. His approximately 80-acre property is located only **1.7 miles from the proposed Buchanan Bluffs Energy Center site**.

The U.S. Environmental Protection Agency recognizes that fossil-fuel-fired power plants are sources of air pollutants, including nitrogen oxides (NO_x) and particulate matter, and that NO_x emissions contribute to the formation of ground-level ozone and fine-particle pollution. EPA has identified respiratory and cardiovascular health effects associated with exposure to these forms of air pollution, including aggravation of asthma.

EPA also recognizes that power-plant air pollution is not necessarily limited to properties immediately adjacent to a generating facility and may affect communities near a plant as well as communities farther downwind.

Mr. Insko does not contend that EPA has established a specific distance from a natural-gas power plant at which health effects will occur. Rather, because his property is approximately **1.7 miles from the proposed facility**, he believes the potential exposure of nearby residents warrants careful, site-specific evaluation.

Mr. Insko respectfully requests that the Commission evaluate the proposed project's potential effects on air quality and human health, including anticipated emissions from the proposed generating facility; air-dispersion modeling; prevailing wind direction and local meteorological conditions; predicted pollutant concentrations at nearby residences and properties; cumulative emissions associated with the proposed generating units and related infrastructure; and appropriate baseline and continuing air-quality monitoring.

Such monitoring would provide objective information concerning existing air quality and allow future conditions to be compared with conditions documented before operation of the proposed facility.

6. Joy of Learning Farm School and Children

Mr. Insko is additionally concerned about the close proximity of the **Joy of Learning Farm School**, located approximately **1.8 miles from the proposed facility**.

The school serves **more than 30 children** and provides education in a farm environment that includes outdoor and agricultural activities.

The proximity of children participating in outdoor activities raises additional concerns regarding air quality, water quality, noise, increased traffic, safety, and other potential environmental impacts.

EPA identifies children and individuals with asthma among populations that can face increased risks from certain air pollutants, including nitrogen dioxide.

Mr. Insko respectfully requests that the Commission specifically consider the proximity and nature of the Joy of Learning Farm School when evaluating the potential effects of the proposed project on the surrounding community.

7. Cumulative Community Impact

Mr. Insko respectfully requests that the Commission consider the cumulative effects of the proposed generating facilities and associated infrastructure rather than evaluating each potential impact solely in isolation.

For residents and property owners living within only a few miles of the proposed project, changes involving air emissions, water consumption, noise, lighting, traffic, construction activity, transmission infrastructure, emergency response needs, and increased industrial activity may collectively affect the character, environment, and quality of life of the surrounding rural community.

8. Position Regarding Evergy's Requested Relief

Mr. Insko opposes Evergy's requested authorization for the proposed Buchanan Bluffs Energy Center.

His opposition is based upon his proximity to the proposed facility and his concerns regarding potential effects on his property, human health, air quality, water resources, surrounding agricultural land and cattle operations, nearby children, safety, property use and enjoyment, and the surrounding rural community.

9. Request for Intervention

Mr. Insko's ownership of approximately 80 acres of property approximately 1.7 miles from the proposed facility gives him a direct interest in this proceeding that differs from that of the general public and that may be adversely affected by the Commission's final order.

WHEREFORE, Jason Anthony Insko respectfully requests that the Missouri Public Service Commission:

1. Grant this Application to Intervene in Case No. EA-2026-0343;
2. Permit Mr. Insko to participate in this proceeding as allowed by Commission rules;
3. Fully evaluate potential effects of the proposed facility upon nearby residents, human health, air quality, groundwater, private wells and other water resources, neighboring agricultural properties and cattle operations, noise levels, traffic, safety, property use and enjoyment, and quality of life;
4. Consider the proximity of the Joy of Learning Farm School and potential effects upon children and its outdoor and agricultural educational environment;
5. Consider appropriate baseline testing, continuing monitoring, safeguards, mitigation measures, and disclosures relating to air quality, water resources, environmental conditions, and other impacts upon nearby properties; and
6. Grant such other and further relief as the Commission determines appropriate.

Respectfully submitted,

/s/ Jason Anthony Insko

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Pro Se Intervenor

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