

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 a Natural Gas Production Facility and a Battery Energy Storage System

Case No. EA-2026-0343

RESPONSE OF THALIA ALICIA INSCO TO EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST'S OPPOSITION TO MOTION TO INTERVENE

COMES NOW Thalia Alicia Insko ("Ms. Insko"), appearing pro se, and respectfully submits this Response to the Opposition of Evergy Missouri Metro and Evergy Missouri West ("Evergy") to Ms. Insko's timely Motion to Intervene. Ms. Insko respectfully requests that the Missouri Public Service Commission deny Evergy's request to deny her intervention and grant her Motion to Intervene. In support thereof, Ms. Insko states as follows:

1. Ms. Insko Timely Filed Her Motion to Intervene

Ms. Insko filed her Motion to Intervene within the intervention period established by the Commission. Evergy's Opposition acknowledges that Ms. Insko is among the individuals who timely sought intervention. Accordingly, this Response does not involve the timeliness issues Evergy has raised regarding separately filed, late applications to intervene.

2. Ms. Insko Personally Owns and Resides on Specifically Identified Property Near the Proposed Facility

Ms. Insko personally owns and resides at the property located at **11210 State Route H SE, Buchanan County, Missouri**, identified by Buchanan County GIS as **Parcel No. 18-1.0-01-000-000-002.001**. Ms. Insko provides the GIS parcel number to specifically identify the real property she personally owns and upon which she bases her individual interest in this proceeding.

Evergy's Opposition states that Ms. Insko's property is approximately **3.2 miles from the proposed Buchanan Bluffs Energy Center site**. Ms. Insko respectfully clarifies that the approximately 3.2-mile figure represents the **driving distance by public roads** between her residence and the proposed site. Measured by **straight-line distance ("as the crow flies")**, Ms. Insko's residence is approximately **2.0 miles from the proposed build site**.

These measurements are not contradictory. They reflect two different methods of measuring the geographic proximity of Ms. Insko's property to the proposed facility. Ms. Insko provides this clarification so that the Commission has an accurate understanding of the actual geographic relationship between her residence and the proposed Buchanan Bluffs Energy Center site.

3. Ms. Insko's Interest Is Personal, Direct, and Geographically Specific

Evergy argues that Ms. Insko does not have an interest different from the general public because Evergy does not propose to obtain an easement over her property and no project facility is presently proposed to physically

cross her land. Ms. Insko respectfully submits that this does not fully address the nature of her interest.

Ms. Insko is not a member of the general Missouri public who merely has an opinion regarding a generating facility located elsewhere in the State. She personally owns and resides on specifically identified real property approximately 2.0 miles from the proposed site by straight-line distance. Her interest involves her own property, residence, family, and daily use and enjoyment of that property.

The issues raised by Ms. Insko concerning potential noise, air emissions, water resources and availability, traffic, safety, environmental impacts, property impacts, and the rural residential character surrounding her home are matters she believes may directly affect her and her property because of its geographic proximity to the proposed facility.

Ms. Insko does not contend that every concern she has is unique to her alone. Rather, she respectfully submits that the fact that other nearby property owners may face similar potential impacts should not, by itself, transform the interests of those individual nearby property owners into interests indistinguishable from those of the general public throughout Missouri.

4. Ms. Insko's Children Attend School Approximately 1.8 Miles From the Proposed Site

Ms. Insko's interest is further particularized by the fact that her children attend **The Joy of Learning Farm School LLC**, located approximately **1.8 miles from the proposed Buchanan Bluffs site**.

Ms. Insko is not attempting to represent the school, the school's owner, its students collectively, or other parents. She identifies this fact solely as part of **her own individual interest as a parent whose children regularly attend school in close geographic proximity to the proposed generating facility**.

Ms. Insko therefore has personal concerns regarding potential effects associated with the proposed facility that could affect both the location where she resides and the location where her children spend substantial portions of their school days.

5. Physical Crossing of Ms. Insko's Property Should Not Be the Sole Measure of Her Interest

Evergy emphasizes that no proposed project facility would be located upon or cross Ms. Insko's property and that Evergy does not propose to acquire an easement or other property interest in her land. Ms. Insko does not dispute that distinction.

However, Ms. Insko respectfully submits that the absence of a transmission line, pipeline, easement, or generating facility physically crossing her parcel does not necessarily resolve whether her individual interest may be adversely affected by a final order in this proceeding.

Potential effects involving noise, air emissions, water resources, traffic, safety, and use and enjoyment of nearby property do not necessarily stop at the boundary of the project site. For that reason, Ms. Insko respectfully asks the Commission to consider the actual geographic relationship between her specifically identified property and the proposed facility, together with the nature of the interests she has identified, rather than determining her interest solely on whether Evergy proposes to physically occupy a portion of her land.

6. Representation by the Office of the Public Counsel Does Not Eliminate Ms. Insko's Individual Perspective

Evergy also argues that the Office of the Public Counsel ("OPC") represents concerns regarding noise, water, emissions, traffic, property values, and other matters raised by nearby residents. Ms. Insko recognizes and respects OPC's statutory role.

However, OPC's representation of the interests of the public does not change the facts concerning Ms. Insko's individual property, her residence's proximity to the proposed facility, or her children's attendance at a school approximately 1.8 miles from the proposed site.

Ms. Insko can provide firsthand information concerning her property, her family's circumstances, the surrounding area, and the potential impacts that concern her as a nearby property owner. Her request for intervention is therefore not an attempt to duplicate OPC's statewide responsibility. It is a request to participate concerning her own specifically identified interests as a nearby property owner and resident.

7. Granting Ms. Insko's Intervention Would Serve the Public Interest

Under 20 CSR 4240-2.075(3), the Commission may grant intervention where a proposed intervenor has an interest different from that of the general public that may be adversely affected by a final order, or where granting the intervention would serve the public interest.

Ms. Insko respectfully submits that her circumstances warrant consideration under both portions of that standard. The proposed Buchanan Bluffs Energy Center Unit 2 is an approximately 710-megawatt combined-cycle natural gas generating facility proposed for Buchanan County.

The Commission's consideration of such a significant project can benefit from accurate, firsthand information from individuals who own and reside on property in close proximity to the proposed site. Ms. Insko timely sought intervention, has identified the specific property she personally owns, has clarified both the driving and straight-line distances between her residence and the proposed site, and seeks to participate in good faith concerning matters that could affect her property, her family, and the surrounding area.

Ms. Insko respectfully submits that allowing such participation can assist the Commission in developing a complete record concerning the proposed facility and its potential effects on nearby residents and properties.

8. Ms. Insko Respectfully Requests That the Commission Preserve Her Intervention

Ms. Insko understands Evergy's concern that the proceeding should be conducted efficiently and without unnecessary duplication. She does not seek to unnecessarily delay these proceedings or impose duplicative burdens upon the Commission or the parties.

She seeks a meaningful opportunity to protect her individual interests and provide the Commission with relevant information regarding a project proposed approximately 2.0 miles by straight-line distance from the home and property she personally owns, approximately 3.2 miles by public-road driving distance, and approximately 1.8 miles from the school her children attend.

Ms. Insko respectfully asks the Commission to consider those specific circumstances when determining whether her interest differs from that of the general public and whether permitting her intervention would serve the public interest.

WHEREFORE

For the foregoing reasons, Thalia Alicia Insko respectfully requests that the Missouri Public Service Commission:

- 1. Deny Evergy's request to deny Ms. Insko's Motion to Intervene;**
- 2. Grant Ms. Insko's timely Motion to Intervene in Case No. EA-2026-0343;**

3. Recognize and consider Ms. Insko's clarification identifying her property as **Buchanan County GIS Parcel No. 18-1.0-01-000-000-002.001**, approximately **3.2 miles by public-road driving distance** and approximately **2.0 miles by straight-line distance** from the proposed Buchanan Bluffs Energy Center site; and
4. Grant such other and further relief as the Commission determines to be just and reasonable.

Respectfully submitted,

/s/ Thalia Alicia Insko

Thalia Alicia Insko

11210 State Route H SE

Buchanan County, Missouri

Pro Se Proposed Intervenor

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed through the Missouri Public Service Commission's Electronic Filing and Information System (EFIS) and served upon the parties of record in accordance with applicable Commission procedures on this **23rd day of September 2026**.

/s/ Thalia Alicia Insko

Thalia Alicia Insko