

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of
Eversource Missouri West, Inc. for a
Certificate of Convenience and Necessity
Regarding Buchanan Bluffs Energy Center Unit 2

File No. EA-2026-0343

**MOTION FOR CLARIFICATION REGARDING
BUCHANAN BLUFFS ENERGY CENTER UNIT 1**

COMES NOW Runae Rhoad (“Intervenor”), appearing pro se, and respectfully moves the Missouri Public Service Commission (“Commission”) for clarification regarding the regulatory treatment of Buchanan Bluffs Energy Center Unit 1 (“Unit 1”). In support of this Motion, Intervenor states as follows:

BACKGROUND AND BASIS FOR REQUEST

1. Intervenor understands that Buchanan Bluffs Energy Center Unit 1 is proposed to be owned 100% by Eversource Kansas Central, Inc. ("EKC"), is intended to support EKC's Kansas system, and is the subject of a proceeding before the Kansas Corporation Commission under K.S.A. 66-1239 concerning ratemaking principles and treatment.
2. Intervenor further understands that Buchanan Bluffs Energy Center Unit 2, proposed to be owned by Eversource's Missouri affiliates, is the generating facility for which Applicants seek a Certificate of Convenience and Necessity in File No. EA-2026-0343. Intervenor does not seek clarification of that ownership or ratemaking distinction.
3. Unit 1 is nevertheless proposed as an approximately 710 MW combined-cycle natural-gas electric generating facility physically located in Buchanan County, Missouri. Eversource's own regulatory filings identify Unit 1 as 100% owned by EKC.
4. Eversource's testimony also describes Units 1 and 2 as co-located sister facilities being developed in a coordinated manner, with common technology, contractors, procurement, and certain shared infrastructure. Eversource's Unit 1 project schedule separately identifies "State Utility Regulatory Approvals" as a milestone expected by mid-2027, with construction beginning in 2027.
5. The Kansas Corporation Commission's September 22, 2026 procedural order in Docket No. 27-EKCE-0149-PRE describes the Kansas proceeding as determining the ratemaking principles and treatment applicable to recovery in rates of project costs, including the combined-cycle facility to be located in Buchanan County, Missouri.
6. Missouri Revised Statutes § 386.020 contains definitions relevant to electric plants and electrical corporations. Section 386.250 addresses Commission jurisdiction over electric plants and persons or corporations owning, leasing, operating, or controlling them. Section 393.170 addresses Commission permission and approval before an electrical corporation begins construction of an electric plant exceeding one megawatt.

7. Intervenor does not assert that EKC, Evergy, or the Commission has violated Missouri law. Intervenor is an affected Missouri resident appearing pro se who seeks to understand how these Missouri provisions apply - or why they do not apply - to Unit 1.

RELIEF REQUESTED

Intervenor respectfully seeks clarification of a narrow question: whether Unit 1's ownership by EKC, its intended service to the Kansas system, and its Kansas ratemaking treatment are the legal basis for concluding that Missouri Public Service Commission permission and approval are not required for construction of Unit 1.

If those facts make §§ 386.020, 386.250, and 393.170 inapplicable to Unit 1, Intervenor respectfully requests that the Commission identify the controlling Missouri statute, Commission precedent, judicial decision, or other legal authority establishing that result. If some other legal basis controls, Intervenor respectfully requests identification of that authority.

Intervenor further requests clarification of what "State Utility Regulatory Approvals" are contemplated for Unit 1 and whether any approval of this Commission is included or required.

WHEREFORE, Intervenor respectfully requests that the Commission clarify whether Buchanan Bluffs Energy Center Unit 1 is subject to Commission permission and approval under § 393.170 in light of §§ 386.020 and 386.250 and, if the Commission concludes that such approval is not required or that the Commission lacks jurisdiction over Unit 1, identify the controlling statutory, judicial, Commission, or other legal authority supporting that conclusion.

Respectfully submitted,

/s/ Runae Rhoad

Runae Rhoad

Intervenor, pro se

Buchanan County, Missouri

Dated: September 29 2026

CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2026, the foregoing document was submitted through the Missouri Public Service Commission's Electronic Filing and Information System (EFIS) for filing in File No. EA-2026-0343 and service upon the parties of record in accordance with the Commission's applicable rules and procedures.

/s/ Runae Rhoad

Runae Rhoad