

**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	)	Case No. EA-2026-0343
to Construct, Install, Own, Operate, Manage,	)	
Maintain, and Control a Natural Gas	)	
Production Facility and a Battery Energy	)	
Storage System	)	

MOTION FOR RECONSIDERATION

COMES NOW Jayson A. Watkins (“Watkins”), appearing on his own behalf, and, pursuant to 20 CSR 4240-2.160(2), respectfully moves the Commission to reconsider its Order Regarding Intervention Requests issued September 29, 2026 (as corrected) (the “September 29 Order”), insofar as it denied Watkins’ timely Application to Intervene. In support of this Motion, Watkins states as follows:

I. INTRODUCTION

Watkins filed his Application to Intervene on September 15, 2026, two days before the Commission’s September 17, 2026 intervention deadline. His application was timely. Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (collectively, “Evergy”) opposed it, and Watkins responded on September 24, 2026. Because the application was timely, no showing of good cause is required under 20 CSR 4240-2.075(10).

The September 29 Order addressed the resident applicants collectively. It found that their interests did not differ from those of “other area residents” and that the Office of the Public Counsel (“OPC”), public comments, a possible local public hearing, and possible amicus briefing were sufficient. See September 29 Order. The Order did not separately analyze Watkins’ individualized

issues associated with a residence that is located adjacent to the proposed Facility, his status as a customer of the water district that told Evergy it cannot serve the Facility, or the documentary evidence he has already placed in the record. The Order lumping resident applicants collectively failed to address any of the issues all of which satisfy the threshold required by 20 CSR 4240-2.075(3)(A). Exclusion of Watkins properly filed application to intervene that clearly stated an interest different from the general public and was supported with evidence contrary to the Evergy witnesses bears the question, why would the Commission vaguely reject such an application?

Watkins respectfully requests individualized findings on each of the two independent grounds in 20 CSR 4240-2.075(3): (A) whether he has an interest different from that of the general public that may be adversely affected by a final order; and (B) whether granting his intervention would serve the public interest. Either ground alone is sufficient. Watkins submits that he satisfies both. Watkins also expressly claims intervention as of right and, in the alternative, requests intervention limited to particular issues under 20 CSR 4240-2.075(9). This Motion supplements, and does not abandon, Watkins' Application to Intervene and his September 24 Response.

II. PROCEDURAL BACKGROUND

On August 31, 2026, Evergy filed its Application seeking certificates of convenience and necessity ("CCNs") for, among other things, Buchanan Bluffs Energy Center Unit 2 ("Unit 2" or the "Facility"), a proposed approximately 710 MW combined-cycle gas turbine generating facility on an approximately 170-acre site (the "Johnson 1" site) along State Route E SE near Frazier, in Buchanan County, Missouri. Unit 2 would be co-located with Buchanan Bluffs Energy Center Unit 1, proposed for Evergy's Kansas affiliate, Evergy Kansas Central ("Unit 1"). The two units would share a switchyard, a natural gas lateral, "water supply and treatment infrastructure," roads,

and other common facilities. Application ¶ 20; Direct Testimony of J. Kyle Olson (“Olson Direct”), p. 14. Evergy requests an order effective by May 8, 2027.

The Commission set September 17, 2026 as the deadline for applications to intervene. Watkins timely filed his Application to Intervene on September 15, 2026. He attached as Exhibit A email correspondence between Evergy and Public Water Supply District No. 1 of DeKalb County (“PWSD No. 1” or the “District”) showing that his rural water district could not supply the requested water, and as Exhibit B the minutes of the District’s August 18, 2026 meeting addressing the District’s USDA loan obligations.

On September 21, 2026, Evergy filed an opposition to sixteen applications to intervene, including Watkins. Evergy argued that no applicant is an “affected landowner” under the CCN rule, 20 CSR 4240-20.045(6)(K), and the Commission’s May 7 and May 14, 2025 orders in Case No. EA-2024-0302 (the “Ameren Orders”); that the applicants’ concerns are those of the general public represented by OPC, citing the Commission’s order in Case No. SA-2015-0065; and that Watkins identified “no parcel.” Evergy Opposition ¶¶ 5–9. Evergy further argued that intervention would cause delay, *id.* ¶ 24, and that the local public hearing scheduled for November 16 would be sufficient, *id.* ¶ 25.

On September 24, 2026, Watkins filed his Response, identifying his home at 11100 State Route E, Agency, Missouri 64401¹, which is adjacent to the Johnson 1 site only separated by the state highway.² Watkins Response further laid out why his application should be granted separate from the general public with specific examples of harm that will directly and uniquely affect his residence and property.

¹ His home address was previously identified in the signature block of his application.

² Watkins’ September 24 Response inadvertently referred to the water district as “PWSD No. 1 of Buchanan County.” The correct name is Public Water Supply District No. 1 of DeKalb County, as reflected in Exhibits A and B to Watkins’ Application to Intervene.

On September 29, 2026, the Commission issued the September 29 Order, effective when issued. The Order denied the resident applicants' applications, including Watkins, on the collective grounds described above. See September 29 Order. The Order granted the timely, unopposed application of Renew Missouri Advocates ("Renew Missouri"), finding that Renew Missouri's interests were distinct and that its participation would serve the public interest, although Renew Missouri identified no site-specific property interest. *Id.*

On October 1, 2026, the Commission issued its Order Setting Prehearing Conference, scheduling a prehearing conference for October 7, 2026, at 9:00 a.m., via WebEx. The service list attached to that order includes only Staff, OPC, Evergy, and Renew Missouri.

III. THE SEPTEMBER 29 ORDER DID NOT MAKE INDIVIDUALIZED FINDINGS ON WATKINS' APPLICATION

The Commission may grant intervention if the applicant "has an interest which is different from that of the general public and which may be adversely affected by a final order arising from the case," 20 CSR 4240-2.075(3)(A), or if "[g]ranting the proposed intervention would serve the public interest," 20 CSR 4240-2.075(3)(B). Each ground requires an assessment of the particular applicant's pleaded interests and proposed contribution. *E. Mo. Landowners All. v. Pub. Serv. Comm'n (In re Invenergy Transmission LLC)*, 604 S.W.3d 634 (Mo. App. W.D. 2020), likewise recognizes that the Commission's intervention standard is disjunctive and distinguishes it from Rule 52.12(a), which requires a showing of inadequate representation.

The Commission's finding that Watkins' interests did not differ from those of "other area residents," September 29 Order fails to answer the questions the rule requires to be answered. The rule compares an applicant's interest to that of "the general public," not to that of other nearby residents. That some neighbors share a similar concern does not convert it into a concern of the general public. If it did, no nearby resident could ever intervene in a generating-plant case, because

every such plant has more than one neighbor. The Commission's current Order conflicts with the Commission's past practice and rulings and calls into question the Commission's conduct and Order. *See* Section VI, below.

In a CCN proceeding for a generating facility to be owned by Evergy Missouri Metro and Evergy Missouri West, the "general public" whose interests OPC represents is, at a minimum, the utilities' ratepayers throughout their Missouri service territories, a population numbering in the hundreds of thousands of customers. Watkins, by contrast, lives in one of approximately 20 households within one-half mile of the proposed site, out of up to 50 residences within one mile. A group that small, defined by physical proximity to a 710 MW power plant, is not "the general public" under any ordinary reading of the rule.

The September 29 Order also did not separately address the public-interest ground as to Watkins. It granted Renew Missouri's intervention because Renew Missouri's interests were distinct and its participation would serve the public interest, although Renew Missouri identified no site-specific property interest. September 29 Order. Moreover, Renew Missouri's application does not state if Renew seeks to support Evergy or intends to oppose the CCN. The ruling confirms, that subsection (3)(B) supports intervention based on an applicant's contribution to the record. Watkins offers a concrete contribution, described in Section V, that the Order failed to evaluate.

Treating the availability of OPC, public comment, a local public hearing, or amicus briefing as a categorical substitute for applying Rule 2.075(3) to an individual application would effectively read subsection (3)(A) out of the rule for every nearby resident. *Gamble v. Browning*, 379 S.W.3d 194, 199 (Mo. App. 2012). The general public's reliance on OPC therefore cannot by itself defeat a showing under subsection (3)(A) or (3)(B). The Commission's vague Order that

Watkins' interest in the application to intervene is similar to the general public interest ignores the requirements set forth by Rule 2.075(3) and the statements made in the application.

The Commission is required to make findings that explain the basis for its ruling. Section 536.090, RSMo, requires findings of fact and conclusions of law in a contested case. The Commission's findings in the September 29 Order are conclusory and wholly insufficient per Missouri law. *State ex rel. Nixon v. Pub. Serv. Comm'n*, 274 S.W.3d 569 (Mo. App.); Watkins and other individuals who properly filed an application to intervene are entitled to decisions on the individual issues they raise. *State ex rel. Midwest Gas Users' Ass'n v. Pub. Serv. Comm'n*, 996 S.W.2d 608 (Mo. App.). The September 29 Order should therefore address Watkins' particular grounds and evidence rather than resolve his application by collective conclusions.

IV. WATKINS HAS AN INTEREST DIFFERENT FROM THAT OF THE GENERAL PUBLIC THAT MAY BE ADVERSELY AFFECTED

A. Proximity to the Site and Shared Access Road

Watkins owns and resides at 11100 State Route E, Agency, Missouri 64401, directly across State Route E, the road by which the site is accessed, from the Facility. Response; Application to Intervene ¶ 8(b). Evergy acknowledges the close proximity by using the house located on the front of Watkins' property as a guide marker for the Commission. Application to Intervene, Ex. A (July 24, 2026 email). Evergy's objection that Watkins identified "no parcel," Evergy Opposition ¶¶ 5–9, is without substance. Watkins application identified his property in the signature block and again in the Response by street address, distance, and road.

B. Customer of the Water District That Refused the Facility's Demand

Watkins is a customer of PWSD No. 1, the rural water district Evergy approached to supply the site. The correspondence attached as Exhibit A to Watkins' Application shows the following:

- (a) On July 24, 2026, Evergy (Mike Joseph) asked the District about water-supply capacity for property “across the street from 10950 SE State Rte. E Agency, MO 64401.”
- (b) On July 28, 2026, Evergy stated a minimum need of 100 gallons per minute (“GPM”), construction demand of approximately 150 GPM (216,000 gallons per day maximum), and peak operational demand for both units of up to 500 GPM. The District responded that its maximum residential meter delivers 10–15 GPM.
- (c) On July 30, 2026, the District advised that its capacity was “significantly below the volume required” and that the requested flow “could place an unacceptable and potentially catastrophic strain on the water distribution system.”
- (d) On August 5, 2026, the District’s Board determined that the volume requested was “well beyond the scope and capacity of the District’s rural water system” and that “the District is unable to supply the quantity of water requested.”
- (e) On August 20, 2026, Evergy (Ethan Henry) responded: “we’ll need to pivot and explore alternative sources for water supply.”

The District has warned that the Facility’s water demand could impose a “potentially catastrophic strain” on the same distribution system that serves Watkins’ home. Whether Evergy ultimately seeks service from the District, draws from groundwater near the District’s system (which will affect Watkins residential pond and agricultural grounds), or builds alternative infrastructure, the Facility’s water supply bears directly on the reliability, pressure, and cost of Watkins’ water service. Exhibit B, the minutes of the District’s August 18, 2026 meeting, reflects the District’s USDA loan obligations which further complicates the water feasibility of the Facility. Any infrastructure, rate, or debt-service consequence of serving or accommodating an industrial user of this scale would fall on the District’s customers, including Watkins, not on Evergy’s ratepayers generally. That interest is not shared by the general public.

C. Property Value, Emissions, Noise, and Safety

As pleaded in his Application, Watkins’ interests include the effects of constructing and operating a 710 MW gas-fired facility across the state highway from his home: effects on property value; exposure to air emissions, noise, and light; construction and operational traffic on State Route E; safety risks associated with a natural gas lateral and generating facility; and the use and

enjoyment of his home. Application to Intervene ¶ 8(a)–(c). A final order granting the CCN would authorize construction and operation at this site. Watkins need not prove ultimate injury at the intervention stage; subsection (3)(A) asks whether his interest “may be adversely affected by a final order.”

D. Proximity Distinguishes Watkins Even from More Distant Residents, and OPC May Face a Conflict

Watkins’ interests differ not only from those of Evergy’s ratepayers generally but from those of more distant area residents. The burdens of noise, emissions, traffic, water-system strain, and property-value loss fall most heavily on the roughly 20 households within one-half mile. OPC’s statutory mandate is to represent the public and ratepayers. Ratepayers’ interest may favor the lowest-cost site, which is the site Evergy has chosen, while the interests of immediate neighbors may favor an alternate site, protective conditions, or denial at this location. Those interests may diverge. Section 386.710, RSMo, gives OPC discretion over which positions it takes and permits it to choose among conflicting public interests; it does not limit other persons’ right to intervene. The Missouri Court of Appeals confirmed this explicitly highlighting that the standard for intervention before the Commission “does not provide that the party requesting intervention must have an interest... inadequately represented by other parties.” *In re Invenenergy Transmission LLC*, 604 S.W.3d 634. Instead, the rule strictly looks at whether the interest is different from the general public. Because Watkins, as an adjacent landowner, has an interest that is fundamentally distinct, the fact that the OPC is already a party to the case is completely and legally irrelevant to Watkins right to intervene. Watkins does not make this argument to criticize OPC; instead, Watkins seeks to illustrate that the Commission’s Order ignores a conflict of interest between the mission of the OPC and Watkins as an adjacent land owner. OPC cannot be expected to advocate the interests of

a handful of immediate neighbors where doing so may conflict with the best interest of the general public it represents. *See* Response, pp. 1–2.

V. GRANTING WATKINS’ INTERVENTION WOULD SERVE THE PUBLIC INTEREST

Independently, Watkins’ participation would serve the public interest under 20 CSR 4240-2.075(3)(B). Watkins has already placed in the record unique documentary evidence, Exhibits A and B to his Application, that no other party has presented. That evidence shows that the local rural water district told Evergy, in writing, that it cannot supply the Facility’s water demand and that the requested flow could cause “catastrophic strain” on its system, and that Evergy acknowledged it would “need to pivot and explore alternative sources for water supply.”

No Evergy witness addresses this deficiency. To the contrary, Evergy witness Olson testified that the site was selected in part for “water access,” and that Evergy’s siting study scored candidate sites on criteria including “water availability,” “nearest receptor,” and “community conflict.” Watkins evidence directly contradicts Evergy’s witnesses. The District’s correspondence bears directly on the validity of those scores and on whether the record supports the selection of the Johnson 1 site. Denying Watkins’ application ignores that he has already presented evidence that is essential to the hearing that OPC nor any other applicant has been able to produce. The Facility’s water supply is not a collateral matter. Evergy’s Application identifies “water supply and treatment infrastructure” as a facility shared by Unit 1 and Unit 2. Application ¶ 20. The source, cost, and feasibility of that supply bear directly on the *Tartan* factors the Commission applies in CCN cases, including whether the project is economically feasible and whether it promotes the public interest. *In re Tartan Energy Co.*, Case No. GA-94-127, 3 Mo. P.S.C. 3d 173 (1994). An unidentified water source and the cost of developing one are matters on

which a complete evidentiary record is plainly in the public interest and the interest of the surrounding land owners.

Watkins is an attorney licensed in Missouri (MO Bar No. 61434), familiar with administrative tribunal practice and procedure. He will comply with the Commission's rules, orders, and procedural schedule, understand the discovery process, will not seek to delay this proceeding, and will focus his participation on the issues identified in this Motion. Evergy's concern about delay, Evergy Opposition ¶ 24, is therefore unfounded as to Watkins, whose application was timely, is supported by evidence that directly contradicts Evergy's application, who seeks to proceed under the schedule the Commission adopts.

VI. COMMISSION PRECEDENT SUPPORTS GRANTING INTERVENTION

In Case No. EA-2006-0309, involving Aquila's South Harper generating plant CCN in Cass County, the Commission applied its intervention rule, then 4 CSR 240-2.075, under which intervention could be granted to an applicant with an interest different from the general public that may be adversely affected, *or* where intervention would serve the public interest. The Commission granted the interventions of individual nearby residents Frank Dillon, Kimberly Miller, and James E. Doll, together with StopAquila.org, Cass County, the City of Peculiar, SIEUA, and SPP. Order Granting Interventions, EA-2006-0309 (Mar. 2, 2006). The residents' application identified each resident's location near the plant and the effects on property value, noise, pollution, and use of their homes. The order shows that the Commission has found that individual nearby residents of a generating plant satisfy the intervention rule based on site-specific interests of the kind Watkins pleads.

In Case No. EA-2005-0248, involving an Aquila combustion-turbine station in Cass County, the Commission granted intervention to StopAquila.org and Cass County *over Aquila's*

opposition. The Commission observed that the intervention rules were more liberal than the civil rules and found that both applicants met *both* intervention tests. See Order Granting Interventions, EA-2005-0248 (Feb. 10, 2005), 2005 Mo. PSC LEXIS 197. That ruling confirms that local, site-specific opposition to a generating facility can establish both an interest different from the general public and a public-interest contribution, even when the utility objects.

The Ameren Orders on which Evergy relies are a red herring. Those orders did not concern intervention standards, but instead concerned notice standards regarding a transmission-line route and the landowners whose property the route would cross. The “affected landowner” provision of the CCN rule, 20 CSR 4240-20.045(6)(K), is a notice provision that identifies whom an applicant must notify; it is not an intervention standard. The Commission rules concerning intervention and notice under 20 CSR 4240 do not have the same requirements. The intervention rule, 20 CSR 4240-2.075(3), contains no requirement that intervenors must be an “affected landowner”. Instead, the standard set by 20 CSR 4240-2.075(3), requires an intervenor “has an interest which is different from that of the general public and which may be adversely affected by a final order “. As an adjacent property owner whose health, property value and quiet enjoyment of his residence will be directly affected, Watkins meets the standard set by 20 CSR 4240-2.075(3). This Commission’s original order mistakenly relied upon Evergy’s red herring argument that applied an incorrect standard. Plaintiff requests that the Commission acknowledge the error and overturn the Order.

VII. PUBLIC COMMENT, A LOCAL PUBLIC HEARING, AND AMICUS BRIEFING ARE NOT SUBSTITUTES FOR PARTY STATUS

The September 29 Order relied on OPC, public comments, a possible local public hearing, and possible amicus briefing. September 29 Order. Watkins welcomes those opportunities, but none provides what party status provides: the ability to conduct discovery; to cross-examine Evergy’s witnesses regarding the water-supply deficiency, the siting study, and alternatives; to file

testimony and exhibits; to brief the issues on the evidentiary record; to participate in settlement discussions; and to seek rehearing and judicial review under § 386.500 and § 386.510, RSMo. The water-supply evidence Watkins has produced is precisely the kind of dispute that requires discovery and cross-examination to test. A comment at a local public hearing on November 16, or an amicus brief that cannot add evidence to the record, cannot accomplish that.

VIII. WATKINS CLAIMS INTERVENTION AS OF RIGHT

Watkins expressly claims intervention as of right, in addition to permissive intervention under Rule 2.075(3). In *Missouri-American Water Co. v. Hall*, 470 S.W.3d 761, 765–67 (Mo. App. W.D. 2015), the court assumed, without deciding, that intervention as of right may exist in Commission proceedings. It dismissed the appeal because the applicant had not pleaded the required elements: (1) a direct interest in the subject of the proceeding; (2) inadequate representation by existing parties; and (3) practical impairment of the applicant’s ability to protect that interest. *Id.* *Hall* also makes clear that denial of permissive intervention is not a final, appealable order. Watkins acknowledges that limitation candidly. It is why individualized findings and Watkins’ claim of intervention as of right matter: if the Commission treats his application only as permissive, the denial may not be immediately reviewable, while an as-of-right claim requires the Commission to address the pleaded elements.

Watkins has pled each element. *Direct interest*: the CCN would authorize construction and operation of a 710 MW generating facility one-quarter mile from his home, on his road, with water demand that his own water district has said it cannot meet without risking “catastrophic strain” on its system. Application to Intervene ¶¶ 7–8; Response, pp. 2–3. *Inadequate representation*: Evergy’s interests are adverse; OPC represents the broader public and ratepayers, whose interest in a lower-cost site may diverge from that of immediate neighbors; and Renew Missouri advances

renewable-energy policy interests and the application does not state Renew is directly opposed to the Evergy Facility. Application to Intervene ¶ 8. *Practical impairment*: if the CCN issues at this site without examination of the water-supply and proximity issues, Watkins will have lost his opportunity in this proceeding to seek denial at this location, an alternate site, or protective conditions.

IX. ALTERNATIVE REQUEST FOR LIMITED INTERVENTION

If the Commission considers full intervention too broad, 20 CSR 4240-2.075(9) permits intervention limited to particular issues. In the alternative, Watkins requests intervention limited to the following issues:

- (a) the adequacy and source of water supply for Unit 2, and the shared Unit 1/Unit 2 water supply and treatment infrastructure insofar as it bears on Unit 2;
- (b) the suitability of the Johnson 1 site and the validity of Evergy's siting study, including its "water availability," "nearest receptor," and "community conflict" criteria;
- (c) impacts on nearby residences and appropriate protective conditions, including the "Good Neighbor Agreement" and community-engagement commitments described in Olson Direct, pp. 23–24; and
- (d) the availability of alternate sites.

Watkins will accept the record as it exists on the date intervention is granted and the procedural schedule the Commission adopts, and he will not seek to delay this proceeding. Because the Commission has set a prehearing conference for October 7, 2026, at 9:00 a.m., Watkins also requests permission to attend and participate in that conference pending the Commission's ruling on this Motion, so that the procedural schedule may be developed with his participation and without need for later adjustment.

X. REQUEST FOR A PROSPECTIVE EFFECTIVE DATE

The September 29 Order was effective when issued. September 29 Order. Section 386.500, RSMo, provides for an application for rehearing that must be filed before the effective date of the order as a prerequisite to judicial review. An order effective upon issuance leaves no practical interval in which to seek rehearing. In *State ex rel. Office of the Public Counsel v. Public Service Commission*, 236 S.W.3d 632, 636–37 (Mo. banc 2007), the Supreme Court held that the Commission could not render the statutory opportunity for rehearing ineffective by allowing only a minimal interval between issuance and effectiveness. That decision relied on *State ex rel. Alton R.R. Co. v. Pub. Serv. Comm’n*, 155 S.W.2d 149 (Mo. 1941), which treated filing before the effective date as essential. In *State ex rel. Office of Pub. Counsel v. Pub. Serv. Comm’n*, 409 S.W.3d 522 (Mo. App. W.D. 2013), the court likewise recognized the Commission’s duty to allow a reasonable time for rehearing before an order takes effect. Although these authorities did not concern an intervention ruling, their reasoning is persuasive here, particularly because Watkins claims intervention as of right.

Watkins therefore requests that any order on this Motion that does not grant full intervention bear a prospective effective date of not less than ten (10), and preferably thirty (30), days after issuance, to preserve a meaningful opportunity to apply for rehearing under § 386.500, RSMo. Watkins does not contend that a new effective date would retroactively cure the September 29 Order.

PRAYER FOR RELIEF

WHEREFORE, Jayson A. Watkins respectfully requests that the Commission:

- (1) Reconsider the September 29 Order as to Watkins’ individual Application to Intervene and make express, individualized findings under 20 CSR 4240-2.075(3)(A) and (3)(B);

- (2) Grant Watkins full intervention in this proceeding;
- (3) Alternatively, find that Watkins' pleaded direct interest, inadequate representation, and practical impairment entitle him to intervention as of right;
- (4) Alternatively, grant Watkins intervention limited to the issues identified in Section IX under 20 CSR 4240-2.075(9);
- (5) Permit Watkins to attend and participate in the October 7, 2026 prehearing conference pending a ruling on this Motion;
- (6) Provide that any order on this Motion that does not grant full intervention bears a prospective effective date of not less than ten (10) to thirty (30) days after issuance, to preserve the opportunity for rehearing under § 386.500, RSMo;
- (7) Rule on this Motion expeditiously; and
- (8) Grant such other and further relief as the Commission deems just and proper.

Respectfully submitted,

/s/ Jayson A. Watkins

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**Applicant for Intervention, appearing on his
own behalf**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed through the Commission's Electronic Filing and Information System (EFIS) and served by electronic mail upon all counsel of record on the official service list in this case on this 2 day of October, 2026.

/s/ Jayson A. Watkins

Jayson A. Watkins