

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Evergy Metro Inc., d/b/a)
Evergy Missouri Metro’s 2021 Triennial) Case No. EO-2021-0035
Compliance Filing Pursuant to 20 CSR)
4240-22)

In the Matter of Evergy Missouri West,)
Inc., d/b/a Evergy Missouri West’s 2021) Case No. EO-2021-0036
Triennial Compliance Filing Pursuant to)
20 CSR 4240-22)

APPLICATION TO INTERVENE
OF THE COUNCIL FOR THE NEW ENERGY ECONOMICS

COMES NOW, The Council for New Energy Economics (“NEE”) and respectfully files this Application to Intervene with the Missouri Public Service Commission (“Commission”) in the above-referenced cases pursuant to 20 CSR 4240-2.075. In support of its Application, NEE states as follows:

1. NEE is a non-profit organization committed to helping utilities and energy decision-makers navigate rapidly evolving utility industry economics using neutral data and analysis. NEE seeks intervention in this docket in order to provide analysis and engage in collaborative dialog regarding the Integrated Resource Plan (“IRP”) filings to be submitted by Evergy Metro Inc., d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc., d/b/a Evergy Missouri West (together, “Evergy”).

2. The above-referenced cases were opened upon a Motion by Evergy “in order to facilitate the sharing of confidential information among known parties and

intervenors.”¹ Evergy has not yet made a substantive filing and no “notice of the case” has been issued by the Commission. Accordingly, there is no established deadline for applications to intervene and this Application is timely.

3. NEE’s mission is to present policy, utility and stakeholder energy decision-makers with complex utility system modeling analysis to help determine the most cost-effective path forward for the deployment of energy resources. NEE is a non-profit with deep regulatory experience and expertise from its Board of Directors, staff, and modeling consultants.² NEE has engaged and is actively working with the Energy Futures Group, an expert energy resources modeling firm to provide Kansas- and Missouri-specific, complex analysis results. NEE has already been granted intervention in Evergy Missouri Metro’s, Evergy Kansas Central, Inc.’s and Evergy Kansas South, Inc.’s IRP proceeding before the Kansas Corporation Commission (“KCC”).³

4. The Commission may grant an application to intervene if “(A) The proposed intervenor or new member(s) 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; *or* (B) Granting the proposed intervention would serve the public interest.”⁴

5. NEE’s interest in presenting complex utility system modeling analysis is different than that of the general public and could be adversely affected by a Commission

¹ Evergy Missouri Metro’s and Evergy Missouri Wests’ Motion to Open New Dockets for Triennial Compliance Filings, EFIS Item No. 1 (Aug. 11, 2020).

² Additional information about NEE’s Board of Directors, staff and modeling consultants can be found on NEE’s website: <https://newenergyeconomics.org/about-us>.

³ KCC Docket No. 19-KCPE-096-CPL, Order Granting Intervention to The Council for the New Energy Economics (Nov. 3, 2020).

⁴ 20 CSR 4240-2.075(3) (emphasis added).

order in this case. Additionally, NEE's participation in this docket will further the interests of justice by adding a unique, neutral voice with a particular expertise in the economics of generation resource selection, at a time when Evergy's generation portfolio is at a crossroads. NEE adopts a long-term stakeholder present value perspective, encouraging utilities and energy decision-makers to review comprehensive data in order to select the most economic resources to lower rates and costs, in ways that benefit all stakeholders, while maintaining grid reliability. NEE's presentation of data and analysis will be supplemental to the information presented by other stakeholders, and will aid the Commission in evaluating Evergy's IRP filings and its capital investment plans. It will serve the interests of justice and the public if NEE is allowed to participate in the process for Evergy's triennial filings, especially at this time of significant change.

6. NEE's participation in these cases will not impair the orderly and prompt conduct of the proceedings. NEE is committed to a collaborative approach and seeks to make analysis and information available to benefit IRP stakeholders. NEE offers its perspective to the Commission and Missouri stakeholders because it understands the vital importance of making the right long-term energy investments and the significant challenges of doing so.

7. In addition to the undersigned, NEE requests service of all pleadings, orders, and other documents in the above referenced cases on the following listed individual:

David Richardson
Sr. Financial Advisor
The Council for the New Energy Economics
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8. NEE had not yet determined the specific positions it will take in this case.

WHEREFORE, NEE respectfully requests that the Commission grant its Petition for Intervention. NEE also requests all other relief to which it is entitled.

Respectfully submitted,

By: /s/Andrew O. Schulte

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ATTORNEY FOR THE COUNCIL FOR
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing pleading has been emailed this March 26th, 2021, to all counsel of record:

/s/Andrew O. Schulte

Andrew O. Schulte