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 Compliance) Filing Pursuant to 20 CSR 4240-22) In the Matter of Evergy Missouri West, Inc. d/b/a) Evergy Missouri West's 2021 Triennial) Compliance Filing Pursuant to 20 CSR 4240-22)

File No. EO-2021-0035

File No. EO-2021-0036

APPLICATION TO INTERVENE OF IBEW LOCAL 412

COMES NOW International Brotherhood of Electrical Workers, Local 412 ("Local 412" or "Union"), by and through undersigned counsel, and hereby petitions the Missouri Public Service Commission ("Commission") to grant this Application to Intervene in the abovereferenced proceedings, pursuant to 4 CSR 240-2.075. In support of this Application, the Union states:

1. International Brotherhood of Electrical Workers, Local 412, is an unincorporated association and labor organization representing approximately 430 employees of Evergy working in the States of Kansas and Missouri. Local 412 represents certain Evergy employees for the purposes of engaging in collective bargaining. Local 412's Business Manager is Shawn Edwards, and the Union's business address is 1760 Universal Avenue, Kansas City, Missouri 64120. The Local's email address is <u>business.manager@ibew412.org</u>, and the phone number is (816) 231-4530.

2. As noted herein, Local 412 represents approximately 430 employees at Evergy, working in the States of Kansas and Missouri. The work performed by these employees is directly related to the processes of electrical generation for customers in Kansas and Missouri, and capital expenditures related to electrical generation and production will have a direct impact on the employees represented by Local 412, and a direct impact on the Union itself. 3. The public interest would be served by granting this Application, as the Union and its members have a clear and significant interest in the outcome of this proceeding, as the Union and its members may be adversely affected by the Commission's actions and orders. Moreover, there is no other party to this proceeding that will adequately represent the interests of the Union and its members. Finally, this proceeding will not be impaired should the Union's Application be sustained.

4. All correspondence, orders and pleadings filed in this matter should be addressed to:

Scott L. Brown Blake & Uhlig, P.A. 475 New Brotherhood Building 753 State Avenue Kansas City, KS 66101 (913) 321-8884 – Phone (913) 321-2396 – Fax slb@blake-uhlig.com

5. IBEW Local 412 does not have a position at this time to the proposed Integrated Resource Plan, and respectfully reserves the right to take positions on specific issues as this matter proceeds.

WHEREFORE, International Brotherhood of Electrical Workers, Local 412, respectfully requests that the Commission sustain this Application to Intervene and that it be granted all rights of a party to this matter.

Respectfully submitted,

BLAKE & UHLIG, P.A.

<u>/s/ Scott L. Brown</u> Scott L. Brown, MO Bar #53154 475 New Brotherhood Building 753 State Avenue Kansas City, KS 66101 (913) 321-8884 (913) 321-2396 – Fax <u>slb@blake-uhlig.com</u>

Attorneys for IBEW Local 412

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed via EFIS on the 6th day of January, 2021, and emailed to all counsel of record in this matter.

/s/ Scott L. Brown Scott L. Brown