

**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 ) **File No. EO-2021-0035**  
Filing Pursuant to 20 CSR 4240-22 )

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

**MISSOURI DIVISION OF ENERGY**  
**APPLICATION TO INTERVENE**

COMES NOW the Missouri Department of Natural Resources – Division of Energy (“DE”) and, pursuant to Missouri Public Service Commission (“Commission”) Rule 20 CSR 4240-2.075, respectfully requests that the Commission grant intervention to DE in the above-styled matters. For its Motion to Intervene, DE states as follows:

1. On August 11, 2020, Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc., d/b/a Evergy Missouri West (“The Companies”) filed a motion to open new dockets. The Companies will file the 2021 Triennial Integrated Resource Plans on April 1, 2021, but asked that the respective dockets be opened in advance in order to facilitate sharing of confidential information among parties and intervenors.

2. DE is a state agency vested with the powers and duties set forth in § 620.035 RSMo. DE’s interests are different than those of the general public, as illustrated by its statutory authority to: (1) plan for future energy needs and energy resource development; (2) monitor and analyze all federal, state, local and voluntarily disclosed private sector energy research projects and voluntarily disclosed private sector energy related data and information concerning supply and consumption; (3) develop, promote, administer and monitor energy conservation programs; (4)

consult and cooperate with all state and federal governmental agencies, departments, boards and commissions and all other interested agencies and institutions, governmental and nongovernmental, public and private, on matters of energy research and development, management, conservation and distribution; and (5) analyze the potential for increased use of diverse energy sources, energy efficient technologies, and other energy alternatives and make recommendations for the expanded use of such alternate energy sources and technologies.

3. DE may develop positions on specific issues as this case proceeds.

4. Communications, correspondence, orders and decision in this matter should be addressed to the undersigned.

WHEREFORE, the Division of Energy respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

/s/ Jacob Westen

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**Attorney for Missouri Division of Energy**

### **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been emailed to the certified service list this 30<sup>th</sup> day of September, 2020.

/s/ Jacob Westen