

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 )

**APPLICATION TO INTERVENE OF NATURAL RESOURCES DEFENSE  
COUNCIL**

Comes now the Natural Resources Defense Council (NRDC) and, pursuant to 20 CSR 4240-2.075, applies to intervene herein and become a party for all purposes.

1. NRDC is a nonprofit corporation organized under the laws of New York with a Midwest office at 20 North Wacker Drive, Suite 1600, Chicago, IL 60606; contact Ashok Gupta at that address or at 212-243-4351. It has over 4,800 members in Missouri, many of whom are Evergy Missouri Metro or West ratepayers. NRDC and its members are interested in promoting energy efficiency, peak demand reduction and renewable energy resources to meet Missouri’s energy needs and to do so more cost-effectively than conventional fossil-fuel and nuclear generation.

2. NRDC has a longstanding interest in DSM, the effectiveness of Evergy’s DSM programs so far, the customer benefits and utility costs resulting from demand-side management and distributed energy resources, and demand-side rates. NRDC also expects to see progress made in the transition away from coal and in the direction of renewable resources, energy storage, beneficial electrification, power purchases,

satisfaction of corporate and municipal clean energy goals, and distribution planning. At this point NRDC does not know what position it will take on the issues in this case once Evergy releases its plan.

3. NRDC will bring significant expertise to this proceeding. NRDC has intervened and/or provided testimony on these issues in public utility commission proceedings in many states, including Missouri, Illinois, Ohio, Wisconsin, New York, Oregon, Iowa, New Jersey and California. NRDC has regularly presented testimony before the US Congress and various state legislatures related to the electric utility industry's use of energy efficiency resources, rate design, utility planning and other topics relevant to this proceeding.

4. Correspondence, communications, orders and decisions may be sent to the undersigned legal counsel.

5. NRDC has interests different from those of the general public or average ratepayer, which could be adversely affected by the decision in this case.

6. It will serve the public interest for NRDC to be allowed to intervene.

WHEREFORE, NRDC respectfully requests the Public Service Commission to grant this application to intervene.

/s/ Henry B. Robertson  
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Attorney for NRDC

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 30th day of September, 2020, to all counsel of record.

/s/Henry B. Robertson  
Henry B. Robertson