

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Tariff Filings of Evergy Metro,)	File No. ET-2025-0286
Inc. d/b/a Evergy Missouri Metro)	Tracking No. JE-2025-0134

**APPLICATION TO INTERVENE OF RENEW MISSOURI ADVOCATES AND
RESPONSE TO EVERGY METRO’S TARIFF FILING**

COMES NOW, Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”), and pursuant to 20 CSR 4240-2.075, applies to intervene in the above-captioned case, and for its *Application to Intervene of Renew Missouri Advocates and Response to Evergy Metro’s Tariff Filing* Renew Missouri states:

1. Renew Missouri is a non-profit corporation organized under the laws of Missouri with its principal place of business at 501 Fay Street, Suite 206, Columbia, MO 65201. Renew Missouri is a registered fictitious name of Renew Missouri Advocates under § 417.200, RSMo. Renew Missouri is a non-profit policy group whose mission is to transform Missouri into a leading state in renewable energy and energy efficiency.

2. As advocates for renewable energy and energy efficiency policy in Missouri, Renew Missouri’s interests are different than those of the general public and may be adversely affected by a final order arising from this case. In particular, Renew Missouri has advocated for the ability of all customers, including net-metered and distributed generation utilizing customers, to access time-of-use (TOU) rates, in the past Evergy Missouri West (EMW) and Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) rate cases.

3. Granting Renew Missouri intervention will serve the public interest by assisting the Commission’s record for decision in this case, and no party will be adversely affected by such intervention.

4. Pleadings, notices, and other correspondence in this case should be directed to undersigned counsel.

5. For its response to Evergy Missouri Metro's (EMM) tariff sheets, Renew Missouri states that the tariff sheets include revisions to modify EMM's TOU and net-metered tariff options, to allow for customers to participate in all TOU rate schedules. The statutory language of § 386.890.3 RSMo, states: "A retail electric supplier shall: ... (2) Offer to the customer-generator a tariff or contract that is identical in electrical energy rates, rate structure, and monthly charges to the contract or tariff that the customer would be assigned if the customer were not an eligible customer-generator ..." Therefore, offering methods for all customers, including net-metered customers, the ability to participate in TOU rates is required by statute.

6. Furthermore, there are amply public policy reasons to support net-metered customers having access to TOU rates. This would encourage the installation of DG technologies on the grid, including rooftop PV solar, battery storage, and electric vehicle (EV) adoption and charger installation, among others. These technologies – when paired with AMI meter deployment – can be used to reduce peak demand across the grid, shift usage to lower demand times, and offer customers greater ability to reduce their electric bills. These are some of the same goals TOU rates seek to accomplish. If EMM offers all TOU rates to its distributed generation resource customers, it will allow the full toolbox of distributed resources to be used for lowering peak demand and providing grid resilience. More importantly, developing distributed generation resources is indispensable for meeting the Missouri renewable energy standard ("RES") and achieving the EMM's goal of renewable energy transformation, considering the current technical challenges that centralized renewable resources face.

7. Finally, the tariff changes mirror those in the *Unanimous Stipulation and Agreement*, approved by the Commission on December 4th, 2024, as part of EMW’s general rate case, parties, except for the Staff of the Missouri Public Service Commission (“Staff”), agreed to the same method for netting and billing distributed energy resource customers who participated in Evergy West’s net-metered tariffs. Additionally, parties to the Ameren Missouri rate case have submitted a *Stipulation and Agreement* that includes an agreement for Ameren Missouri to implement the same method in its jurisdiction.

8. EMM provided the tariff sheets to Renew Missouri at time of its initial JE filing and Renew Missouri’s review found it comports with the agreement in the EMW rate case.

WHEREFORE, Renew Missouri respectfully requests that the Commission accept this *Application to Intervene of Renew Missouri Advocates and Response to Evergy Metro’s Tariff Filing*, and approve the eight (8) tariff sheets, along with any further relief the Commission deems proper.

Respectfully,

/s/ Nicole Mers

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GENERAL COUNSEL FOR RENEW
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Certificate of Service

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 18th day of April 2025.

/s/ Nicole Mers