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

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In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of New Modified Tariffs for Service to Large Load Customers

Docket No. ET-2025-0184

### EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST <u>APPLICATION FOR INTERVENTION</u>

**COMES NOW**, Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("EMM") and Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("EMW") (collectively "Evergy" or the "Company") and, pursuant to 20 CSR 4240-2.075(10), seek to intervene in the above-captioned docket. In support of their Application, EMM and EMW state as follows:

### **APPLICATION TO INTERVENE**

1. EMM is a corporation duly organized and existing under the laws of the State of Missouri, with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. The Company is primarily engaged in the business of generating, transmitting, distributing, and selling electric energy in portions of eastern Kansas and western Missouri. The Company is an electric corporation and public utility as defined in Section 386.020 Mo. Rev. Stat. (2000), as amended. A Certificate of Good Standing was filed with the Commission in Case No. EN-2020-0063 and is incorporated herein by reference in accordance with 20 CSR 4240-2.060(1)(G). Applicant is an electric corporation and public utility as defined in Section 386.020, Mo. Rev. Stat. (2010), as amended.<sup>1</sup>

2. EMW is a Delaware corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. It is engaged in the generation, transmission,

<sup>&</sup>lt;sup>1</sup> All statutory references are to the Missouri Revised Statutes (2010), as amended to date.

distribution, and sale of electricity in western Missouri, including the suburban Kansas City metropolitan area, St. Joseph, Warrensburg, Sedalia, and surrounding counties. Evergy Missouri West is an "electrical corporation" and a "public utility" subject to the jurisdiction, supervision, and control of the Commission under Chapters 386 and 393. A certificate of authority for EMW to do business in Missouri as a foreign corporation was filed with the Commission in No. EN-2020-0064 and is incorporated by reference pursuant to 20 CSR 4240-2.060(1)(G).

3. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

Anthony R. Westenkirchner Senior Paralegal – Regulatory Affairs Evergy, Inc. 1200 Main Street, 17<sup>th</sup> Floor Kansas City, Missouri 64105 Telephone: (816) 556-2668 E-mail: Anthony.Westenkirchner@evergy.com

4. On May 19, 2025, the Missouri Public Service Commission ("Commission") issued its *Order Directing Notice, Setting an Intervention Deadline, and Directing Staff to File a Pleading* ("Order") in this docket.

5. The Company's interests are different than those of the general public, as illustrated by the fact that EMM and EMW are Missouri investor-owned electric utilities also seeking Commission approval for new tariffs needed to serve the same type of large load customers that Ameren is seeking to serve. Evergy filed an application, tariffs and testimony seeking approval of new and modified tariffs for service to large load customers (LLPS customers) in File No. EO-2025-0154 and the Commission has ordered a procedural schedule that includes testimony, hearings, and briefing. 6. The Company's approach to serving LLPS customers is different than Ameren's approach in several ways. For example, EMM and EMW suggest the inclusion of a proposed System Support Rider and the requirement of collateral to receive service, neither of which are being sought by Ameren's filing. The System Support Rider is designed to ensure the appropriate recovery of costs to serve LLPS customers and the collateral requirement helps to ensure the creditworthiness of new large load customers and ensure payment of their bills for electric service. A consistent approach throughout the state will maximize economic development opportunities and allow for consistent regulation. Consistency also benefits customers who risk differing rate treatment and cost sharing simply by virtue of geography. Given that the Ameren and Evergy Applications are intended to serve the same types of customers, it is important that the resulting tariffs and programs do not conflict. Evergy's request to intervene will help provide full transparency to large load customer tariff implications and permit the Commission and all parties to this docket to fully evaluate both approaches to large load customer demand and, ultimately, issue tariffs that are in the best interest of the state and all customers.

**WHEREFORE**, the Company respectfully requests that the Commission issue an order authorizing them to intervene in the above-captioned docket.

Respectfully submitted,

# <u>|s| Roger W. Steiner</u>

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### ATTORNEYS FOR EVERGY MISSOURI METRO AND EVERGY MISSOURI METRO

## **CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first class United States Mail, postage pre-paid, to counsel for all parties of record this 12<sup>th</sup> day of June 2025.

<u>|s| Roger W. Steiner</u>

Roger W. Steiner