

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

In the Matter of the Application of Union)	
Electric Company d/b/a Ameren Missouri)	Docket No. ET-2025-0184
for Approval of New Modified Tariffs)	
for Service to Large Load Customers)	

**EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST
REPLY TO AMEREN OPPOSITION TO APPLICATION TO INTERVENE**

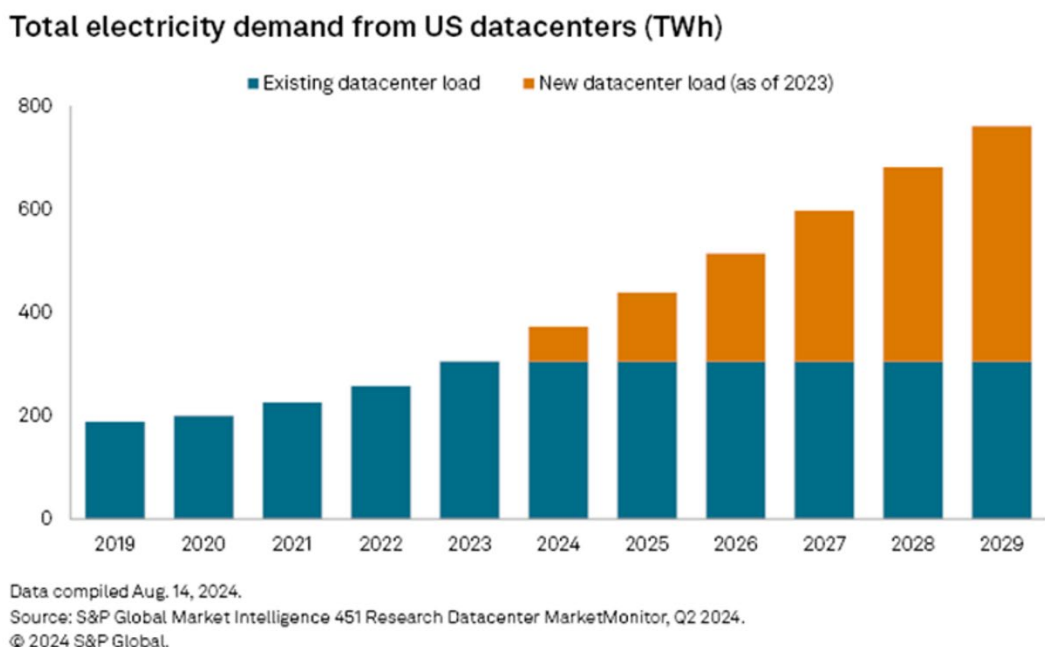
COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“EMM”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“EMW”) (collectively “Evergy” or the “Company”) and, for their *Reply* (“Reply”) to Union Electric Company d/b/a Ameren Missouri’s (“Ameren Missouri”) *Response in Opposition to Application for Intervention* (“Response”) state as follows:

1. The Company filed its *Application for Intervention* (“Intervention”) on June 12, 2025. Ameren filed its Response in Opposition on June 23, 2025.

2. Ameren argues that the Company did not meet the requirements under 20 CSR 4240-2.075 to intervene. As shown below, the Missouri Public Service Commission (“Commission”) should permit intervention by Evergy as its specific interest in this case may be materially impacted by a final order in this case and Evergy’s intervention would serve the public interest by providing a more complete record for the Commission to consider.

3. As the Commission is aware, a technological renaissance is underway due to the growth of load due to the construction of data centers. Artificial Intelligence technology, combined with the widescale electrification of various industries, and policy and security desires to onshore many of the data centers and manufacturing plants needed to support these advancements, is

driving significant electric load growth across the country. The chart below illustrates the current and expected data center load growth.



4. According to the North American Electric Reliability Corporation 2023 Long-Term Reliability Assessment, 10-year peak demand growth rates “are higher than at any point in the past decade” and “are increasing more rapidly than at any point in the past three decades.”¹ Not only is the scale of new large customer load drastically increasing, but many large customers have ambitious clean energy and emission reduction targets.

5. This unprecedented demand challenge requires the Commission balance the interest of all stakeholders. Evergy and Ameren have different approaches to achieving this balance. Evergy’s participation in this docket will ensure that the Commission has the information it needs to strike this balance of interests.

¹ North American Electric Reliability Corporation 2023 [Report](#) at 33 (December 2023).

6. Only Evergy as a Missouri utility, who has provided service to a nationally known data center customer and is continuing to negotiate with large load customers is able to offer a relevant perspective to Ameren's filing. Staff and OPC, while representing the interests of other stakeholders, have not negotiated with large load customers. The other intervenors are large load customers themselves and are unable to provide the same utility-based information that Evergy can provide. The Commission will benefit from Evergy's experience and expertise.

7. Past Commissions have recognized the value of another utility providing information in cases where issues that could potentially impact all Missouri utilities are being decided. In fact, Ameren has requested and been granted such intervention in numerous cases². For example, Missouri- American Water Company ("MAWC") filed a rate case (WR-2017-0285) with a forward- test year and other novel regulatory mechanisms. Ameren sought intervention in the case and indicated that the Commission's consideration of such issues could, as a practical matter, have an impact on similar issues that arise in Ameren cases or other proceedings at the Commission which in turn could have an impact on Ameren's business, making Ameren's interests different than the interests of the general public and Ameren's intervention may aid the Commission in addressing the policy implications of such issues. While the Office of the Public Counsel objected to Ameren's intervention, the Commission granted Ameren's intervention

² Order Regarding Ameren Missouri's App. To Intervene, In re KCP&L Co. Request for Authority to Implement General Rate Increase, No. ER-2014-0370 (Dec. 3, 2014); Order Granting Apps. To Intervene at 1-2, In re App. Ameren Transmission Co. IL CCN Transmission Line, No. EA-2017-0345 (Oct. 5, 2017); Order Granting Apps. To Intervene at 1-2, In re App. Grain Belt Express LLC CCN, No. EA-2023-0017 (Oct. 26, 2022); Order Regarding Apps. To Intervene at 2, 11, In re KCP&L Co. Approval of Demand-side Programs, No. EO-2014-0095 (Jan. 29, 2014); Order Granting Apps. To Intervene at 1-2, In re KCP&L Co. Approval of Demand-Side Programs, No. EO-2015-0240 (Sep. 22, 2015); Order Granting Apps. To Intervene at 1-2, In re KCP&L Greater Mo. Co. Approval of Demand-Side Programs, No. EO-2015-0241 (Sep. 22, 2015); Order Granting Apps. To Intervene at 1-2, In re App. Empire District Electric Co. Approval Cost Savings Plan, No. EO-2018-0092 (Nov. 28, 2017); Order Granting Intervention at 1, In re KCP&L Greater Mo. Operations Co. Rate Case, ER-2016-0156 (Mar. 29, 2016); Order Granting Apps. To Intervene at 1-2, In re EMM Approval Transportation Electrification Portfolio, No. ET-2021-0151 (Mar. 15, 2021); Order Granting Apps. To Intervene at 1-3, In re Missouri-American Water Co. Rate Case, WR-2017-0285 (Aug. 9, 2017).

finding that Ameren “as a public utility wrestling with regulatory, policy and business issues similar to MAWC, it can provide information, perspectives and experience for the Commission’s consideration, which will serve the public interest” because those considerations “differ from those of the general public and those interests may be adversely effected by a final order in this case.”³

8. Moreover, Ameren requested and was granted intervention based on its ability to provide its unique Missouri utility perspective in other dockets where issues that affect Missouri utilities were being decided by the Commission.⁴ Evergy is in the same position in this docket, and requests the Commission recognize the benefits of hearing Evergy’s expertise in the provision of service to large load power users.

9. Contrary to Ameren’s argument in paragraph 15, Evergy cannot raise its issues concerning the service of LLPS customers under Ameren’s proposed tariffs in File No. EO-2025-0154. That docket does not address Ameren’s tariffs, only Evergy’s. Evergy offered Ameren the option of requesting late intervention in its case.

10. Finally, Evergy is not asking the Commission to decide this case using a one-size fits-all formula as Ameren hints in paragraph 10. Evergy is requesting the Commission permit it to give its perspective on how the Commission can best balance the interests of all stakeholders in the current “land rush” of data centers seeking electric service in Missouri. As a past Commission recognized when it permitted Ameren to intervene in a KCP&L rate case:

‘[N]o direct pecuniary or property rights, or infringement of civil rights of a person, must be involved before [an applicant] could be a party to a proceeding before the Commission.’⁵). It has been the Commission’s practice to liberally grant intervention to organizations that promote various

³ Order Granting Apps. To Intervene at 2, No. WR-2017-0285.

⁴ Order Granting Apps. To Intervene at 1-2, In re EMM Approval Transportation Electrification Portfolio, No. ET-2021-0151 (Mar. 15, 2021) (transportation electrification pilot program); Order Granting Apps. To Intervene at 1-2, In re App. Empire District Elec. Co. Approval Cost Savings Plan, No. EO-2018-0092 (Nov. 28, 2017) (wind generation tax incentives).

⁵ State ex rel. Consumers Pub. Serv. Co. v. PSC, 352 Mo. 905, 919, 180 S.W.2d 40, 45 (1944).

public policy positions in order to consider a full range of views before reaching a decision. Ameren Missouri's arguments are persuasive that Ameren Missouri has an interest different than that of the general public, that it may be adversely affected by a final order in this case, and that its participation as a party would serve the public interest.

Order Regarding Ameren Missouri's App. To Intervene at 2-3, No. ER-2014-0370.

WHEREFORE, the Company submits this Reply and respectfully requests that the Commission issue an order authorizing it to intervene in the above-captioned docket.

Respectfully submitted,

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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 27th day of June 2025.

/s/ Roger W. Steiner

Roger W. Steiner