BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Evergy Metro,)Inc. d/b/a Evergy Missouri Metro and Evergy)Missouri West, Inc. d/b/a Evergy Missouri West)for an Accounting Authority Order Allowing)the Companies to Record and Preserve Costs)Related to COVID-19 Expenses)

APPLICATION TO INTERVENE OF SIERRA CLUB

Comes now Sierra Club, and pursuant to 20 CSR 4240-2.075 and the Commission's "Order Directing Notice" of May 11, applies to intervene herein. In support of its motion to intervene, Sierra Club states the following.

1. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has more than 750,000 members nationally and approximately 12,000 members in Missouri, many of whom reside in Evergy's Missouri service territories and are Evergy ratepayers. The Missouri Chapter of Sierra Club has an office at 2818 Sutton Blvd, St. Louis, MO 63143; email john.hickey@sierraclub.org; telephone 314-644-1011. Sierra Club exists for the purpose of preserving and protecting environmental values. Consistent with this mission, Sierra Club for many years has advocated for transitioning Missouri's electricity sector from coal-fired generation to cleaner and lower cost forms of energy, such as energy efficiency and renewable energy sources. Sierra Club is concerned with emissions of greenhouse gases that lead to global warming, and with pollution from non-renewable sources that

cause a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, respiratory problems, and other problems.

2. Sierra Club has an interest in how the proposed COVID-19 Accounting Authority Order will affect Evergy's progress on renewable energy and reduced reliance on coal. Sierra Club also regards the protection and advancement of low-income customers and communities of color as an integral part of its mission and is therefore interested in how Evergy treats "lost revenue" and late payment or non-payment of bills.

3. Sierra Club's interests could be adversely affected by an AAO resulting from this case. Sierra Club is not yet certain of the position it will take in this case.

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

5. It will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, Sierra Club respectfully requests the Public Service Commission to grant the application to intervene.

<u>/s/ Henry B. Robertson</u> Henry B. Robertson (Mo. Bar No. 29502) Great Rivers Environmental Law Center 319 N. Fourth Street, Suite 800 St. Louis, Missouri 63102 Tel. (314) 231-4181 Fax (314) 231-4184 hrobertson@greatriverslaw.org

Attorney for Sierra Club

2

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 1st day of June, 2020, to all counsel of record.

<u>/s/ Henry B. Robertson</u> Henry B. Robertson