

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

Bethann Hill,	)	
	)	
Complainant,	)	
v.	)	File No. EC-2026-0350
	)	
Evergy Metro, Inc. d/b/a Evergy Missouri Metro) And	)	
Evergy Missouri West, Inc. d/b/a Evergy) Missouri	)	
West,	)	
	)	
Respondent.	)	

MOTION TO CONSOLIDATE

COMES NOW Bethann Hill, in consideration for this *Motion to Consolidate* (“Motion”), states as follows:

PROCEDURAL HISTORY

1. On July 26, 2026, Denise Allegri filed an informal complaint with the Missouri Public Service Commission (“Commission”) requesting Case No. EC-2024-0015 be re-opened pursuant to Commission *Order Dismissing Complaints* ([EFIS Docket #139](#)).

2. On August 14, 2026, a *Motion to Reopen Case* was filed by Denise Allegri in Case No. EC-2024-0015 ([EFIS Docket Item #151](#)).

3. Case No. EC-2024-0015, filed on July 25, 2023, is directly related to the informal complaint filed on July 26, 2026 and also my complaint in Case No. EC-2026-0350, as well as my original complaint Case No. EC-2024-0073.

4. On September 11, 2023, the following complainants filed complaints against Evergy Missouri West with the Commission:

EC-2024-0062	Betty Beyers
EC-2024-0063	David A. Handley
EC-2024-0064	Denise Allegri
EC-2024-0065	Charles E. Bracken

EC-2024-0066	Jesse L. Green, Jr.
EC-2024-0067	Kendra B. Butner
EC-2024-0068	Letha Sue Boland
EC-2024-0069	Susan G. Bracken
EC-2024-0070	Victor Butner
EC-2024-0071	Marjorie J. Dyer

5. On September 12, 2023, the following complainants filed complaints against Evergy Missouri West with the Commission:

EC-2024-0072	Barbara A. Rasa
EC-2024-0073	Bethann C. Hill
EC-2024-0074	Candace K. Robertson
EC-2024-0075	Donald W. Rasa
EC-2024-0076	Dwayne Marsh
EC-2024-0077	Norman Howard
EC-2024-0078	Rebekah L. Marsh
EC-2024-0079	Scott Rasa
EC-2024-0080	Stephen L. Robertson
EC-2024-0081	Teresa Howard
EC-2024-0082	Bart D. Wyatt
EC-2024-0083	Carl J. Wouden
EC-2024-0084	Cheryl K. Wouden
EC-2024-0085	Dorothy J. Bell
EC-2024-0086	Steven J. Bell
EC-2024-0087	Amy Wolfe
EC-2024-0088	Glen Wolfe
EC-2024-0089	Mark A. Hill
EC-2024-0090	Steven A. Dyer
EC-2024-0091	Walter L. Dyer

6. On September 18, 2023, the following complainants filed complaints against Evergy Missouri West with the Commission:

EC-2024-0093	Aaron Collett
EC-2024-0094	Collette Collett
EC-2024-0095	Chad Krummel
EC-2024-0096	Jessica Krummel
EC-2024-0097	Cheryl Hedden

7. On September 21, 2023, Evergy filed a *Motion to Consolidate* ([EFIS Docket #25](#)) the individual referenced complaints into the original complaint filed by Timothy Allegri

and JJ Green (Case No. EC-2024-0015).

8. On October 3, 2023 the Commission filed an *Order* ([EFIS Docket #28](#)) consolidating the cases, citing Evergy's *Motion to Consolidate* ([EFIS Docket #25](#)), which states:

"Evergy Missouri West submits that there are common questions of law and fact in these complaints and their consolidation would be administratively expedient and simplify filings."

9. All landowner complaints allege the same violations by Evergy and are directly related to Case No. EC-2024-0015. In order to avoid the numerous individual complaints being re-filed containing common questions of law and fact, I agree with Evergy that consolidation of all the complaints related to the Fayetteville project be consolidated into Case No. EC-2024-0015.

MOTION TO CONSOLIDATE CASES

1. In each instance, all complainants identified in the above paragraphs filed nearly identical complaints (collectively, the "Complaints"), and in many instances, separate (but nearly identical) complaints appear to have been filed by spouses and/or relatives with the same last name and address.

2. Accordingly, as Evergy agreed in its September 21, 2023 *Motion to Consolidate*, there are common questions of law and fact in the above-referenced cases and the consolidation of all related Complaint Cases would be administratively expedient in that it would simplify the filings to be made by all parties to these matters.

3. Commission Rule 20 CSR 4240-2.110(3) allows the Commission to consolidate pending actions involving related questions of law or fact.

WHEREFORE, Complainant requests that the Commission issue an order reopening Case No. EC-2024-0015 and consolidating any existing, future or related complaint cases filed

with regard to Evergy's Fayetteville Transmission line project, including this Case No. EC-2026-0350, with Case No. EC-2024-0015 being the lead case.

Respectfully submitted,

/s/ Bethann Hill

Bethann Hill, Complainant

Email: [REDACTED]

CERTIFICATE OF SERVICE

A copy of the foregoing has been filed on EFIS this 14th day of August 2026 to all named parties of record.

/s/ Bethann Hill

Bethann Hill