

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the Application of Evergy)
Kansas Central, Inc. and Evergy Kansas)
South, Inc. for Approval to Make Certain) Docket No. 25-EKCE-294-RTS
Changes in their Charges for Electric)
Service)

PETITION TO INTERVENE

COMES NOW, International Brotherhood of Electrical Workers, Local Union No. 304 (hereinafter “IBEW Local 304” or the “Union”) by and through their counsel, Grissom Miller Law Firm, LLC, and respectfully submits this Application to Intervene pursuant to K.S.A. 77-521(a) and K.A.R. 82-1-225 permitting it to intervene in the above-captioned proceedings. In support of this Application, the Union states as follows:

1. IBEW Local 304 is a voluntary labor organization doing business and representing employees in the State of Kansas. The Union is also a labor organization as defined in the National Labor Relations Act, as amended, 29 U.S.C. § 152, *et seq.* The Union has a collective bargaining agreement with Evergy, Inc. (“Evergy”) and represents roughly 800 employees as their exclusive bargaining representative, all of whom will be affected by the instant proceedings.

2. The names, addresses and telephone numbers of the Petitioners seeking leave to intervene are:

Chris Ubel, Business Manager
IBEW Local Union No. 304
3906 NW 16th Street
Topeka, KS 66615
Phone: 785-235-2301
Fax: 785-235-3345

Counsel: Jake Miller
Grissom Miller Law Firm, LLC

1600 Genessee Street, Suite 460
Kansas City, MO 64102
Phone: (816) 336-1213
Fax: (816) 384-1623
jake@grissommiller.com

3. The Union requests that service be made to the above counsel.
4. The Union represents employees of Evergy, who may be affected by Orders entered by the Commission in this proceeding, and, accordingly, the Union and the employees they represent are interested parties in this proceeding. The Union and the employees they represent have a direct interest in this proceeding different from that of the general public, and which cannot be adequately represented by any other party.
5. The Union has no current position regarding the Application herein. However, to the extent that said Application may impact, directly or indirectly, the wages, benefits, and terms and conditions of employment of the employees that the Union represents, the Union reserves the right to participate in the proceedings to the extent necessary to protect the interests of their members.
6. The Union seeks permission to intervene in this matter pursuant to K.S.A. 77-521(a) and K.A.R. 82-1-225.
7. No party to this matter will be adversely impacted or prejudiced by granting this Application to Intervene.

WHEREFORE, having stated the grounds for intervention, their position and interest in this proceeding, the International Brotherhood of Electrical Workers, Local Union No. 304 hereby requests that the Commission:

- A. Grant them leave to intervene in these proceedings on their behalf and on behalf of their members and to be heard at such time as the Commission may fix; and

B. In all respects be a party to this proceeding.

Dated, this 27th day of June, 2025.

Respectfully submitted,

Grissom Miller Law Firm, LLC

/s/ Jacob D. Miller

Jacob D. Miller, #28337

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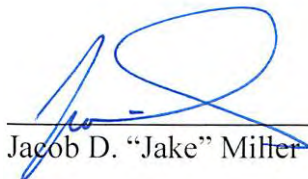
jake@grissommiller.com

ATTORNEY FOR IBEW LOCAL 304

VERIFICATION

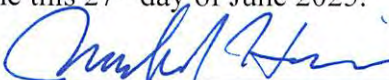
STATE OF MISSOURI)
) ss:
COUNTY OF JACKSON)

Jacob D. "Jake" Miller, being duly sworn upon this oath, deposes and states that he is the Attorney for IBEW Local Union No. 304, that he has read and is familiar with the foregoing *Application for Intervention*, and that the statements therein are true to the best of his knowledge, information, and belief.



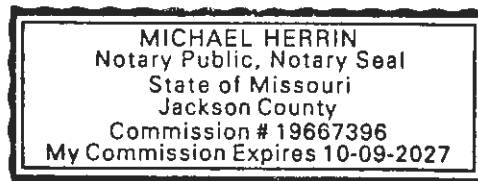
Jacob D. "Jake" Miller

SUBSCRIBED AND SWORN to before me this 27th day of June 2025.



Notary Public

My Appointment Expires: 10/9/2027



CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of June, 2025, the foregoing was electronically filed with the Kansas Corporation Commission and that one copy was delivered electronically to all parties on the service list as follows:

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/s/ Jacob D. Miller

Jacob D. Miller #