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Filed Date: 03/03/2025
State Corporation Commission
of Kansas

BEFORE THE KANSAS CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Petition of Evergy Kansas Central, Inc., Evergy Kansas South, Inc., and Evergy Metro, Inc. for Determination of the Ratemaking Principles and Treatment that Will Apply to the Recovery in Rates of the Cost to be Incurred for Certain Electric Generation Facilities under K.S.A. 66-1239.	)	Docket No. 25-EKCE-207-PRE

PETITION FOR INTERVENTION OF SUSTAINABILITY ACTION NETWORK, INC.

Sustainability Action Network, Inc. (hereinafter "Sustainability Action Network") hereby petitions for leave to intervene in the above-captioned docket. This Petition to Intervene is filed pursuant to K.S.A. § 77-521 and K.A.R. § 82-1-225. In support of this petition, S-A-N states as follows:

1. Sustainability Action Network is a nonprofit corporation organized under the laws of Kansas with a local address of P.O. Box 1064, Lawrence, KS 66044. Sustainability Action Network has over 50 members in Kansas, most of whom are located in Northeast Kansas in both urban and rural areas, and most of whom are Evergy customers, including our Coordinator, Michael Almon, and our Assistant Coordinator, William Steele, both of whom reside in Lawrence, Kansas.

2. On November 6, 2024, Evergy Kansas Central, Inc. (EKC) , Evergy Kansas South, Inc. (EKS), Evergy Metro (EM), and Evergy Kansas Metro (EKM) (collectively, "Evergy") filed a Petition for Predetermination of Ratemaking Principles and Treatment for what Evergy has denominated as (a) the "Viola Plant" - a 710 MW natural gas generation plant; (b) the "McNew

Plant" - a 710 MW natural gas generation plant; and (c) the "Kansas Sky" - a 200 MW solar generation facility.

3. Sustainability Action Network and its members are concerned about a range of issues raised by Evergy's Joint Application, including, but not limited to, how Evergy will meet the electricity needs of Kansans, the implication for Evergy ratepayers, the workings of any utility incentives package, the state's economic stability, the impact on ecological integrity, the costs of decommissioning and environmental restoration, and the health of all Kansans.

4. Sustainability Action Network seeks to intervene in this proceeding in order that its members and others may benefit from properly crafted and promulgated policies that govern the location, construction, and operation of Evergy's assets, including, but not limited to, energy conservation, reduction of greenhouse gases, distributed electricity generation, renewable electricity, a range of electricity storage technologies, V2G interface capability, hazardous materials management, supporting and preserving the state's agricultural economy, public safety, and designing a fair rate structure.

5. Sustainability Action Network holds a unique position among Kansas environmental organizations in our independence from any national advocacy groups. While we collaborate on occasion with other regional or state organizations and businesses, we set our own agenda for our program activities, centered in and concerned with Kansas issues. We will offer a perspective to the Commission's docket that reflects the interests of our membership and other interested Kansans.

6. Under K.S.A. 77-521(b) the Commission may grant intervention upon determining that such is in the interests of justice and will not interfere with the orderly and prompt disposition of the matter.

WHEREFORE, Sustainability Action Network respectfully requests that it be permitted to intervene and be made a party to this docket for all purposes.

Respectfully submitted,

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STATE OF KANSAS) ss.
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VERIFICATION (K.S.A. 53-601)

I, Hudson H. Luce, verify under penalty of perjury that I have caused the foregoing Petition to Intervene to be prepared on behalf of Sustainability Action Network, Inc.; that I have read and reviewed the Petition to Intervene; and that the contents thereof are true and correct to the best of my information, knowledge, and belief.

/s/ Hudson H. Luce
Hudson H. Luce

Executed on this 1st day of March, 2025.

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of March, 2025, a copy of the above Petition to Intervene was sent via electronic mail to:

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