

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

In the Matter of the Application )  
of Evergy Kansas Metro, Inc., Evergy )  
Kansas South, Inc. and Evergy Kansas )  
Central, Inc. for Approval of Large Load ) Docket No.: 25-EKME-315-TAR  
Power Service Rate Plan and Associated )  
Tariffs. )

**PETITION FOR INTERVENTION OF NATURAL RESOURCES DEFENSE COUNCIL**

The Natural Resources Defense Council hereby petitions to intervene in the above-captioned docket pursuant to K.S.A. 77-521 and K.A.R. 82-1-225. In support of this petition the following is stated:

1. NRDC is a nonprofit organization with a Midwest office at 20 North Wacker Drive, Suite 1600, Chicago, IL 60606, and over 2,600 members in Kansas—many of whom are Evergy customers. These customers include NRDC Senior Staff Member Ashok Gupta, who resides in Merriam, Kansas, and is a long-time Evergy customer.

2. On February 11, 2025, Evergy Kansas Metro, Inc. d/b/a Evergy Kansas Metro, Evergy Kansas South, Inc., and Evergy Kansas Central, Inc. (together as “Evergy Kansas Central”) (collectively referred to herein as “Evergy”) filed with the Kansas Corporation Commission (hereinafter “Commission”) an Application requesting approval of its Large Load Power Service (“LLPS”) Rate Plan and associated tariffs.

3. NRDC seeks to intervene in this proceeding in order that its members and others may benefit from properly designed policies as part of Evergy’s proposal , such as energy efficiency solutions and rate design for families with high energy cost burden in Kansas.

4. More generally, NRDC is interested in ensuring that Evergy's Joint Application in 25-EKME-315-TAR, envisioned by Evergy in its filing are done in a manner that advance clean energy, lower emissions, and provides proper incentives for utilities to invest in cleaner resources and protects consumers at the same time.

5. NRDC will bring significant expertise to this proceeding. The Staff of NRDC has extensive history with resource planning, integrated distribution planning, rate design and alternatives to traditional regulation.

6. NRDC has intervened and/or provided testimony in public utility commission proceedings in many states, including Kansas, Missouri, Illinois, Michigan, Ohio, Wisconsin, Colorado, New Mexico, Nevada, New York, Oregon, Iowa, New Jersey, and California. NRDC has regularly presented testimony before the US Congress and various state legislatures, including the Kansas legislature, related to the electric utility industry's use of energy efficiency resources, utility planning, and other topics relevant to this proceeding.

7. 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.

8. NRDC has not yet determined the positions it will take in this matter because it is still reviewing the proposed tariff structures, and discovery may also be necessary to help form such positions. Accordingly, NRDC expects to review the application more thoroughly, and possibly conduct and analyze discovery, after which it will decide whether to submit testimony that will articulate its position(s) on discrete issues.

9. NRDC's expertise is different from other parties in this docket. NRDC's national experience as a public interest advocate and partner with regulators and businesses in energy efficiency, distribution investments, and rate design will be an important source of information for the Commission in considering the issues herein.

10. NRDC is primarily interested in developing a regulatory regime that yields broad economic, environmental, and health benefits. These interests will be impacted by how Evergy's Joint Application in 25-EKME-315-TAR moves forward.

11. Unless NRDC is allowed full intervention in this docket it is unlikely any other party will have comparable expertise related to policies such as energy efficiency, demand-side management, rate design and integrated distribution planning adopted by other utilities and regulatory bodies and how such policies can be implemented in Evergy's service territory.

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

Respectfully submitted,

/s/Robert R. Titus

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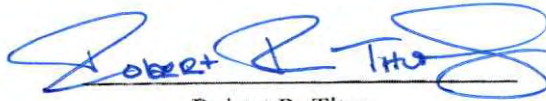
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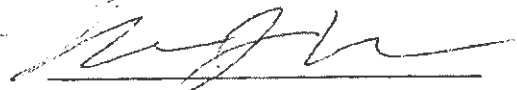
VERIFICATION

STATE OF KANSAS )  
 ) ss:  
COUNTY OF JOHNSON )

Robert R. Titus, of lawful age, being first duly sworn upon oath, deposes and states: That he is an attorney for Titus Law Firm, LLC, that he has read the above and foregoing and that the statements therein contained are true and correct according to his knowledge, information and belief. Thomas J. Connors, of lawful age, being first duly sworn upon oath, deposes and states: That he is an attorney for Connors Law Firm, I.L.C, that he has read the above and foregoing and that the statements therein contained are true and correct according to his knowledge, information and belief.



Robert R. Titus



Thomas J. Connors

Subscribed and sworn to before me this 28<sup>TH</sup> day of MARCH, 2025.

My appointment expires: \_\_\_\_\_



Notary Public

Robert Ray Titus  
Notary Public State of Kansas  
My Appt Expires 9-26-27

**CERTIFICATE OF SERVICE**

Undersigned hereby certifies that on March 28, 2025, the above and foregoing Petition to Intervene of Natural Resources Defense Council was emailed to the following:

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