

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

In the Matter of the Application of Evergy)
Metro, Inc. Evergy Kansas Central, Inc.,)
and Evergy Kansas South, Inc. for) Docket No. 21-EKME-320-ACT
Approval of Transportation Electrification)
Portfolio)

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. Natural Resources Defense Council (“NRDC”) is a nonprofit corporation organized under the laws of New York with a Midwest office at 20 North Wacker Drive, Suite 1600, Chicago, IL 60606. NRDC has over 2,600 members in Kansas many of whom are Evergy customers – including one of its senior staff members, Ashok Gupta, of twenty-nine years who resides in Merriam, Kansas and is a customer of Evergy.

2. On February 24, 2021, Evergy Kansas Metro, Inc. and Evergy Kansas Central, Inc. (hereinafter, collectively referred to as “Evergy”) filed an application with the Kansas Corporation Commission (“Commission”) seeking approval of its Transportation Electrification Portfolio (“Portfolio”). More specifically, Evergy seeks an order from the Commission to implement its Portfolio which includes rebate programs, rates for charging services, and associated program administration budget. Evergy also seeks authorization to use a deferral accounting mechanism to track program costs associated with the Portfolio and seeks to recover those costs in future rates cases. Finally, Evergy requests a Commission finding related to the company’s Clean Charge Network expansion plans.

3. NRDC and its members are interested in a range of issues raised by Evergy's Portfolio, including the design and implementation of the proposed EV tariff, allocation of costs associated with Evergy's Portfolio and its impact on customer bills, and environmental impacts associated with Evergy's Portfolio. More broadly, NRDC has an interest in how Evergy's Portfolio will help allocate costs in a way that lowers all Evergy customer bills (including NRDC members) while improving the environment and health of all Kansans.

4. NRDC seeks to intervene in this proceeding in order that its members and others benefit from well-designed EV tariffs, which should help allocate costs in a way that lowers customer bills for everyone (including NRDC members), while also improving air quality given the increased use of EV's which in turn should reduce pollution.

5. NRDC will bring significant expertise to this proceeding. The Staff of NRDC has nearly a decade worth of staff experience on EV issues – having been a part of almost a dozen different state proceedings. NRDC has extensive experience on how to best shape state regulatory policy to align the interests of all utility customers, utility shareholders, and the general public.

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.

7. 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, as stated above, will be an important source of information for the Commission in considering the issues herein.

8. NRDC is primarily interested in developing a regulatory programs that yields broad economic and health benefits. These interests will be impacted by Evergy's Portfolio.

9. Unless NRDC is allowed full intervention in this docket it is unlikely any other party will have comparable expertise related to the issues contained herein.

WHEREFORE, NRDC 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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VERIFICATION

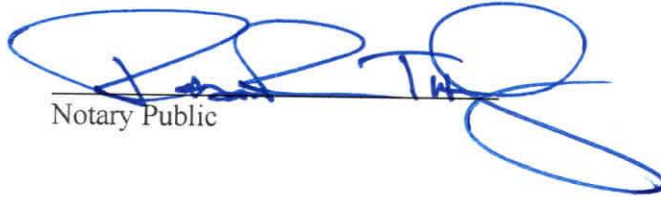
STATE OF KANSAS)
)
) ss:
COUNTY OF JOHNSON)

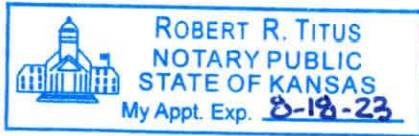
Thomas J. Connors, of lawful age, being first duly sworn upon oath, deposes and states: That he is an attorney for Titus Connors, LLC, that he has read the above and foregoing and that the statements therein contained are true and correct according to his knowledge, information and belief.


Thomas J. Connors

Subscribed and sworn to before me this 15 day of March, 2021.

My appointment expires: _____


Notary Public



CERTIFICATE OF SERVICE

Undersigned hereby certifies that on March 15, 2021, the above and foregoing Petition to Intervene of Natural Resources Defense Council was emailed to the following:

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