

FILED ELECTRONICALLY

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ATTORNEY FOR SIERRA CLUB

**KANSAS CITY, KANSAS BOARD OF PUBLIC UTILITIES  
RATE HEARING**

**SIERRA CLUB'S PETITION TO INTERVENE**

Sierra Club hereby notices its intention to intervene in the 2023 Kansas City, Kansas Board of Public Utilities rate increase hearing. Sierra Club respectfully requests the right to participate fully in this proceeding as a party.

Sierra Club represents its own interests as an environmental organization and that of its Kansas members who are utility customers of the Kansas City, Kansas Board of Public Utilities. One such member is Ty Gorman.

Sierra Club has not yet determined its position(s) on the proposed rate increase. Sierra Club intends to review BPU Staff's pre-filed written testimony when it is available, engage in discovery, and develop its position upon receipt of BPU Staff's responses. Sierra Club therefore respectfully requests leave to develop its position(s) as this rate hearing proceeding develops. In the alternative, Sierra Club states that the development of its position(s) will involve studying revenue requirement issues related to electric generation and offering recommendations to the Board of Public Utilities to cost-effectively improve its electric service in an environmentally sustainable fashion.

In addition to signatory counsel, please address communications and correspondence to Sierra Club, including service of all documents in this proceeding, to:

Sunil Bector  
Sierra Club  
2101 Webster, Suite 1300  
Oakland, CA 94312-3011  
415.977.5759 (phone)  
[sunil.bector@sierraclub.org](mailto:sunil.bector@sierraclub.org)

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(415) 977-5589  
[tony.mendoza@sierraclub.org](mailto:tony.mendoza@sierraclub.org)

WHEREFORE, Sierra Club respectfully requests that the Commission grant its Petition to Intervene in this proceeding.

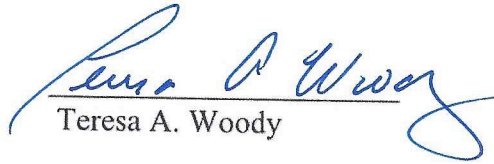
/s/ Teresa A. Woody

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VERIFICATION

STATE OF MISSOURI            )  
  ) ss  
COUNTY OF JACKSON        )

I, Teresa A. Woody, of lawful age and being duly sworn, state and affirm the following: that I am counsel for Sierra Club; I have read and reviewed the above and foregoing Petition; and the contents thereof are true and correct to the best of my information, knowledge, and belief.

  
Teresa A. Woody

SUBSCRIBED AND SWORN before me this 24<sup>th</sup> day of March, 2023.

DOMINICK VALLEJO  
NOTARY PUBLIC - NOTARY SEAL  
STATE OF MISSOURI  
MY COMMISSION EXPIRES NOVEMBER 20, 2026  
JACKSON COUNTY  
COMMISSION #22692400

\_\_\_\_\_  
Notary Public

My commission expires: 11/20/26

## CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on this 24<sup>th</sup> day of March, 2023, a true and correct copy of the above and foregoing **Sierra Club's Petition to Intervene** was electronically delivered to Randy Otting at [ratehearing@bpu.com](mailto:ratehearing@bpu.com).

/s/ Teresa A. Woody

Teresa A. Woody