

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of KCP&L Greater Missouri)
Operations Company’s Submission of Its 2018) File No. EO-2019-0316
Renewable Energy Standard Compliance Report)

**KCP&L GREATER MISSOURI OPERATIONS COMPANY’S
NOTICE and REQUEST FOR VARIANCE**

COMES NOW KCP&L Greater Missouri Operations Company (“GMO” or the “Company”), and for its Notice and Request for Variance, states as follows:

1. On April 15, 2019, the Company submitted its Renewable Energy Standard (“RES”) Compliance Report for 2018 (“RES Report”).

2. GMO wishes to inform the Missouri Public Service Commission (“Commission”) that, for 2017, GMO “over-retired” GMO S-RECs in the North American Renewables Registry (“NARR”) because the Company did not take into account that NARR automatically adds the 0.25 multiplier for Missouri based solar facilities. When NARR applied the 0.25 multiplier an over-retirement resulted. As there is now no means of “unretiring” S-RECs, the Company instructed NARR to transfer the 1,208 excess S-RECs to the 2018 retirement account, bringing the Company into compliance for 2017. However, the RECs transferred by NARR were 2014 vintage and expired at the end of 2017 under the 4 CSR 240-20.100(1)(M). Because the RECs have expired they cannot be used for 2018 compliance.

3. GMO requests the Commission to grant a variance from 4 CSR 240-20.100(3)(J), which is the regulation that requires all RECs shall be retired during the calendar year for which compliance is sought and that an electric utility shall retire RECs in sufficient quantify to meet its RES portfolio requirements. The Company requests a variance from the above rule so that it may

retire 1,208 S-RECs (1,208 S-RECs with a Missouri compliance equivalency of 1,510) in 2019 to be used for 2018 compliance.

4. Undersigned counsel has been authorized to represent that Staff supports the Company's variance requests.

WHEREFORE, GMO respectfully requests the Commission accept this Notice in compliance with its 2018 Renewable Energy Standard obligation and that it grant GMO the variance requested.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorneys for KCP&L Greater Missouri
Operations Company**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand delivered, emailed or mailed, postage prepaid, this 31st day of May 2019, to all parties of record.

/s/ Roger W. Steiner

Roger W. Steiner