BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light Company's Submission of Its 2018 Renewable Energy Standard Compliance Report)))	File No. EO-2019
In the Matter of KCP&L Greater Missouri Operations Company's Submission of Its 2018 Renewable Energy Standard Compliance Report)))	File No. EO-2019

RENEWABLE ENERGY STANDARD COMPLIANCE REPORT AND REQUEST FOR WAIVER

COME NOW Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO") (collectively the "Company"), and provides its Renewable Energy Standard ("RES") Compliance Report. The Company also requests a waiver of a portion of the Missouri Public Service Commission's ("Commission") RES Rules, found at 4 CSR 240-20.100(8)(A)1.I.(V), and states as follows:

1. As part of its efforts to comply with Missouri's RES law, the Company is purchasing Renewable Energy Credits ("RECs") from various vendors.

For RECs purchased from a renewable energy resource not owned by the Company,
4 CSR 240-20.100(8)(A)1.I.(V) requires all meter readings used for calculation of the payments
from the electric utility to the owner of the facility.

3. The Company requests that the Commission grant it a limited waiver of this requirement because the meter reading information is not provided by the vendors that the Company purchases RECs from. As it did last year, the Company is providing the invoice information requested by Staff.

4. Good cause exists for the granting of this waiver, as the meter readings are not available.

5. The Company applied for a similar waiver in 2017 (File Nos. EO-2018-0288 and EO-2018-0289) which was granted by the Commission in its separate *Order*[s] *Regarding 2017 RES Compliance Report and Granting Waiver* issued in separately both dockets on June 20, 2018.

WHEREFORE, the Company requests the Missouri Public Service Commission grant it a waiver of the meter readings requirement 4 CSR 240-20.100(8)(A)1.I.(V).

Respectfully submitted,

[s] Roger W. Steiner

Robert J. Hack, MBN 36496 Phone: (816) 556-2791 E-mail: rob.hack@kcpl.com Roger W. Steiner, MBN 39586 Phone: (816) 556-2314 E-mail: roger.steiner@kcpl.com Kansas City Power & Light Company 1200 Main – 16th Floor Kansas City, Missouri 64105 Fax: (816) 556-2787

Attorney for Kansas City Power & Light Company and 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 15th day of April 2019, to all parties of record.

[s] Roger W. Steiner

Roger W. Steiner