

**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) File No. EO-2019-0315
Energy Standard Compliance Report)

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

**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.
2. 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

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**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