

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

In the Matter of Evergy Metro, Inc.)
d/b/a Evergy Missouri Metro’s)
Submission of Its 2022 Renewable)
Energy Standard Compliance Report.)
AND)
In the Matter of Evergy Missouri West,)
Inc. d/b/a Evergy Missouri West’s)
Submission of Its 2022 Renewable)
Energy Standard Compliance Report)

Case No. EO-2023-0361
EO-2023-0362

**Office of the Public Counsel’s Comments on the 2022 Revised
Renewable Energy Standard Compliance Reports**

COMES NOW the Office of the Public Counsel (“OPC” or “Office”) and for its Comments on the Revised Renewable Energy Standard (“RES”) Compliance Reports (“Reports”)¹ of Evergy Missouri Metro and Evergy Missouri West,² states:

The OPC submits these comments to note that Evergys’ revisions to their RES Reports do not adequately address the concerns that this Office raised on June 30, 2023.³ In those filings, the OPC noted several ways that Evergy’s Reports failed to follow Missouri law, the Public Service Commission’s (“Commission”) regulation, and the purpose behind the RES reporting requirement. In response, Evergy amended and refiled new RES Reports for each company on July 27, 2023.⁴

¹ Addressed jointly as “Filings” when also relating to the relevant RES Compliance Plans.

² Addressed jointly as “Evergy” or “Companies”

³ See *Generally, Office of the Public Counsel Comments (Public and Confidential)*, EO-2023-0361, EFIS Item No. 11; *Office of the Public Counsel Comments (Public and Confidential)*, EO-2023-0362, EFIS Item No. 11.

⁴ *Notice of Filing Revised 2022 Renewable Energy Standard Compliance Reports (Public and Confidential)*, EO-2023-0361, EFIS Item No. 12; *Notice of Filing Revised 2022 Renewable Energy Standard Compliance Reports*, EO-2023-0362, EFIS Item No. 12.

The OPC went through the revised reports to ensure that the Companies revisions addressed the concerns of this Office. Evergy's revised Reports do not address the fact that the Companies used expired RECs for compliance. The Reports do not address the fact that the rate impact of RES compliance, when calculated correctly, is much higher than the RES impact, 1%, that is legally permitted.

The only changes Evergy did make were to the amounts of acquired RECs and SRECs listed in each Report and Evergy now has two (2) tables under each "**RULE(8)(A)1P**" in their Reports titled "Calculation of retail rate impact" and "2022 [Metro/West]-MO Res Compliance Cost." However, these tables still do not show a mathematical calculation and do not contain several costs noted by Ms. Lena Mantle in the attached memo to the previous filing.

Finally, both reports remain vague and confusing for the public as well as to those of us who are tasked with regulating these companies. Evergy chose not to explain why the numerical changes were necessary. In keeping with the concerns around Evergy's vague wording in their Reports, the additional information granted little insight into the Companies' ability to follow Missouri's rules and regulations, both in fact and in spirit.

WHEREFORE, the OPC renews its request that the Commission find Evergy Missouri Metro and Evergy Missouri West in non-compliance with RES due to the content and nature of all current Filings.

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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this seventh of August, 2023.

/s/ Anna Martin