

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

In the Matter of the Application of Evergy)
Missouri West, Inc. d/b/a Evergy Missouri West)
for Permission and Approval of a Certificate of) File No. EA-2022-0328
Convenience and Necessity Authorizing It to)
Operate, Manage, Maintain and Control an)
Existing Wind Generation Facility in Oklahoma)

RENEW MISSOURI’S STATEMENT OF POSITIONS

COMES NOW Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”) and offers the following *Statement of Positions*:

Issue A: Does the evidence establish that granting an Operating Certificate of Convenience and Necessity (“CCN”) to Evergy Missouri West, Inc. (“EMW”) to own, operate, and maintain the 198.6 MW wind generation facility located in Woodward, Ellis and Dewey Counties in Oklahoma (“Persimmon Creek” or the “Project”) is necessary or convenient for the public service, pursuant to Section 393.170.2-.3, RSMo, and 20 CSR 4240-20.045(2)-(3)?

Renew Missouri Position: Yes.

Sub-issue 1: Is there a need for EMW to operate Persimmon Creek?

Renew Missouri Position: Yes.

Sub-issue 2: Does EMW have the financial ability to operate Persimmon Creek?

Renew Missouri Position: Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

Sub-issue 3: Is EMW qualified to operate Persimmon Creek?

Renew Missouri Position: Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

Sub-issue 4: Is EMW’s proposed operation of Persimmon Creek economically feasible?

Renew Missouri Position: Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

Sub-issue 5: Does EMW's proposed operation of Persimmon Creek promote the public interest?

Renew Missouri Position: Yes. EMW's proposed operation of Persimmon Creek promotes the public interest in several ways consistent with Commission precedent. First, wind energy provides affordable, reliable, safe, and environmentally-friendly energy.¹ In addition, wind generation helps corporations in Missouri perform more competitively, as there is an emergence of corporate customer interest in renewable energy and corporations are seeking increased access to renewable power.² The Commission has further expressed its general support for renewable energy because of the larger benefits renewable generation provides to the public.³ Finally, EMW's proposed acquisition and operation of Persimmon Creek falls directly in line with public policy set at the federal level and enshrined in the massive federal investment in the clean energy sector by the Inflation Reduction Act.

Issue B: If the Commission grants an Operating CCN for the Project, what conditions, if any, should the Commission impose on the CCN?

Renew Missouri Position: Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

Sub-issue 1: Should a production tax credit tracker be established?

Renew Missouri Position: Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

Sub-issue 2: Should the Commission order that EMW track revenues produced by Persimmon Creek for ratemaking purposes?

¹ EFIS File No. EA-2016-0358, Doc. No. 758 *Report and Order on Remand*, p. 47.

² EFIS File No. EA-2019-0010, Doc. No. 168 *Report and Order*, p. 21.

³ EFIS File No. EA-2019-0010, Doc. No. 168 *Report and Order*, p. 32 (citing Sections 393.1025 and 393.1030 [Renewable Energy Standard]; and Section 393.1075 [Missouri Energy Efficiency Investment Act]).

Renew Missouri Position: Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

Issue C: Should the Commission Order EMW to provide resource-specific economic analysis utilizing reasonable assumptions beyond the IRP results, LCOE estimates, and installed capacity costs in support of future CCN applications?

Renew Missouri Position: Renew Missouri did not file testimony specifically on this issue but reserves the right to base a final position on the evidence presented at hearing as Renew Missouri did provide testimony on the larger policy benefits of the IRP process.

Issue D: What, if any, additional project-specific analysis requirements should the Commission Order from EMW for future CCN requests?

Renew Missouri Position: Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

Issue E: Does the evidence establish that authorizing EMW under Section 393.190.1 to complete the asset transfer and merger described in the Application so that it may own and operate Persimmon Creek is not detrimental to the public interest?

Renew Missouri Position: Yes.

WHEREFORE, Renew Missouri submits its *Statement of Positions*.

Respectfully Submitted,

/s/ Alissa Greenwald

Alissa Greenwald, Mo. Bar No. 73727

P.O. Box 413071

Kansas City, MO 64141

T: (913) 302-5567

alissa@renewmo.org

/s/ Andrew Linhares

Andrew Linhares, Mo. Bar No. 63973

3115 S. Grand Blvd, Suite 600

St. Louis, MO 63118

T: (314) 471-9973

andrew@renewmo.org

Attorneys for Renew Missouri

Certificate of Service

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 14th day of February 2023:

/s/ Alissa Greenwald
