

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
File No. EE-2021-0238, Evergy Missouri West, Inc.

FROM: Claire M. Eubanks, PE - Engineering Analysis

/s/ Claire M. Eubanks, PE 2/16/2021 /s/ Jamie S. Myers 2/16/21
Engineering Analysis Manager/ Date Staff Counsel's Office / Date

SUBJECT: Staff Recommendation to Evergy Missouri West's Revised Cogeneration Tariff
Sheets

DATE: February 16, 2021

On January 26, 2021, Evergy Missouri West, Inc. ("EMW") filed a request for waiver of 20 CSR 4240-3.155(3) as well as one (1) rate tariff sheet proposed to become effective on February 25, 2021. On February 10, 2021 the Commission granted the requested waiver.

This filing reflects a change in the rate at which EMW will pay its customers under its rate schedule titled "Cogeneration Purchase Schedule." The Commission's Net Metering Rule, 20 CSR4240-20.065, implements Section 386.890, RSMo., the "Net Metering and Easy Connect Act." The Act makes it easier to obtain net metering service from electric utility service providers in Missouri, including EMW. As a part of its Net Metering Rule, the Commission requires regulated utilities net metering rate to be the same as its cogeneration rate. Specifically, the Commission's Net Metering Rule, 20 CSR 4240-420.065(1)(B) states "avoided fuel cost means the incremental costs to the electric utility of electric energy, but for the purchase from the customer generator, the utility would generate itself or purchase from another source. Avoided fuel cost is used to calculate the electric utility's standard rate for purchase from systems less than one hundred (100) kilowatts pursuant to 20 CSR 4240-20.060." Typically, EMW proposes the same rate change both for its Electric Power Purchases from Qualifying Facilities and for its Net Metering customers, however, Evergy has not yet filed the net metering tariff sheet.

The proposed cogeneration rate decreases the current rate as shown below:

2021-2022	2019-2020	2017-2018
\$0.022/kWh	\$0.0240/kWh	\$0.0250/kWh

The Missouri Public Service Commission Engineering Analysis Staff (Staff) has reviewed this filing

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and the avoided cost data EMW provided. **

_____ ** For this filing, Staff would describe the resulting cost as the avoided fuel and purchased power cost. Based on the information and descriptions provided, it is Staff's opinion that the proposed rates seem to be reasonable estimates of avoided energy costs.¹ EMW's filing indicates **

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EMW did not provide the levels of purchases in blocks as required by 20 CSR 4240-3.155(4)(A). **

_____ ** Based on the information provided and the limited review time, it is not clear to Staff how differently sized blocks would affect the ** _____ ** which would then be subject to adjustments for the factors described in 20 CSR 4240-20.060(4)(E).

Staff recommends that the Commission approve the following tariff sheet, as filed on January 26, 2021, to go into effect for service on and after February 25, 2021, the requested effective date:

P.S.C. Mo. No. 1
2nd Revised Sheet No. 102.1 Canceling 1st Revised Sheet No. 102.1

Staff has verified that EMW has filed its most recent annual report.

1 Staff notes that it did not have time to perform a thorough and in depth review of all of the underlying data utilized to produce these rates or the assumptions used to produce that data given the time available between the filing date and tariff effective dates.

2 Email response from Evergy dated February 11, 2021.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West 2020 Biennial)
Parallel Generation Tariff) **Case No. EE-2021-0238**

AFFIDAVIT OF CLAIRE M. EUBANKS, PE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW Claire M. Eubanks, PE, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation to Approve Tariff Sheet*; and that the same is true and correct according to her best knowledge and belief, under penalty of perjury.

Further the Affiant sayeth not.

/s/ Claire M. Eubanks, PE
Claire M. Eubanks, PE