

**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 ) **File No. EO-2020-0329**  
2019 Renewable Energy Standard Compliance )  
Report )

**STAFF REPORT ON EMM'S  
2019 RENEWABLE ENERGY STANDARD COMPLIANCE REPORT**

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff") and for its *Staff Report on EMM's 2019 Renewable Energy Standard Compliance Report* respectfully states:

1. On April 15, 2020, Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("EMM" or "Company") filed its Renewable Energy Standard ("RES") Compliance Report for calendar year 2019 as required by Commission Rule 20 CSR 4240-20.100(8). The Company also requested a limited waiver from the requirements of Commission Rule 20 CSR 4240-20.100(8)(A)1.I.(V) to substitute invoices or another reasonable substitute when meter readings are not available.

2. Following discussions with Staff, the Company filed a Revised Compliance Report ("Revised Report") on May 26, 2020, correcting several inadvertent errors. The Commission then granted Staff's request for additional time to analyze the Revised Report, moved the due date of Staff's Report from June 1, 2020, to June 12, 2020.

3. Staff has conducted its review of EMM's Revised Report and has determined that the Company has not achieved compliance with the RES requirements for the 2019 compliance year due to retirement of RECs outside of the time period allowed by Commission Rule 20 CSR 4240-20.100(3)(J). The Company requested a variance from this rule on April 24, 2020, due to an administrative error

resulting in RECs being retired in January 2020, rather than by December 31, 2019. As described further in Staff's Memorandum, attached hereto as Appendix A, Staff recommends the Commission grant the Company a waiver from the requirements of Commission Rule 20 CSR 4240-20.100(3)(J), and expand the waiver to cover 20 CSR 4240-20.100(3)(B) as well for compliance year 2019.

4. Staff does not recommend the Commission grant the Company a limited waiver from the requirements of Commission Rule 20 CSR 4240-20.100(8)(A)1.I.(V) at this time. However, as described further in Attachment A, Staff will provide an additional recommendation after the Company provides invoices and information requested in Staff Data Request 0002.

**WHEREFORE**, Staff submits its Report for the Commission's information and consideration.

Respectfully Submitted,

**/s/ Travis J. Pringle**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 12th day of June, 2020.

**/s/ Travis J. Pringle**