

**STATE OF MISSOURI  
PUBLIC SERVICE COMMISSION**

At a session of the Public Service  
Commission held at its office in  
Jefferson City on the 4<sup>th</sup> day of  
September, 2019.

In the Matter of KCP&L Greater Missouri Operations )  
Company's Submission of its 2018 Renewable )  
Energy Standard Compliance Report )

**File No. EO-2019-0316**

**ORDER REGARDING 2018 RES  
COMPLIANCE REPORT AND GRANTING WAIVER**

Issue Date: September 4, 2019

Effective Date: October 4, 2019

On April 15, 2019, KCP&L Greater Missouri Operations Company ("GMO") filed its Renewable Energy Standard Compliance Report for 2018 ("Report"), as it was required to do by Commission Rule 4 CSR 240-20.100(8). The Commission's rule requires the Staff of the Commission to review the utility's report and to file a report about its review within 45 days.<sup>1</sup>

Staff filed a pleading on the Report on May 30, 2019. Staff determined that the Company has not achieved compliance with the solar RES requirements for the 2018 compliance year due to retirement of RECs which were expired for the 2018 compliance year. Staff recommends the Company retire an additional 1,510 S-RECs for 2018 compliance and seek a variance from the Commission to make this retirement outside the timeframe allowed under Commission Rule 4 CSR 240-20.100(3)(J).

---

<sup>1</sup> 4 CSR 240-20.100(8)(D).

On May 31, 2019, GMO responded. GMO requests a waiver of Commission Rule 4 CSR 240-20.100(3)(J) to retire 1,208 S-RECs in 2019 to be used for 2018 compliance. GMO represented that Staff supports GMO's request.

The Commission's rule also allows Public Counsel and other interested persons or entities to file comments regarding GMO's Report.<sup>2</sup> The Office of the Public Counsel ("OPC") claims that GMO is out of compliance with Commission Rule 4 CSR 240-20.100(8)(A)1.P, which requires the calculation of the actual renewable energy standard calendar year rate impact. OPC states that the Commission should require GMO to re-file its Report in a manner that accurately includes the costs resulting from the purchased power contracts for wind energy in the retail rate impact calculation.

On June 24, 2019, the Commission directed GMO and Staff to file additional information. Those parties complied on June 28, 2019. GMO filed further information on July 12, 2019.

The Commission's regulation does not specify what, if any, action the Commission is to take regarding GMO's Report and any alleged deficiencies in that Report, except to allow the Commission to direct the utility to provide additional information or to address any concerns or deficiencies identified in the comments.<sup>3</sup> After considering the submitted comments, the Commission concludes that no further order from the Commission is appropriate at this time regarding the RES Report.

The Commission, however, will grant GMO the limited waiver of Commission Rule 4 CSR 240-20.100(8)(A)1.I.(V) it requested because meter reading information is not provided by the vendors from which GMO purchases Renewable Energy Credits. Staff

---

<sup>2</sup> 4 CSR 240-20.100(8)(E).

<sup>3</sup> 4 CSR 240-20.100(8)(F).

recommends the Commission grant this waiver. The Commission will further grant the waiver of Commission Rule 4 CSR 240-20.100(3)(J), as requested by GMO and Staff.

**THE COMMISSION ORDERS THAT:**

1. KCP&L Greater Missouri Operations Company will not be required to provide additional information or to address any concerns or deficiencies.
2. KCP&L Greater Missouri Operations Company is granted a limited waiver from Commission Rule 4 CSR 240-20.100(8)(A)1.I.(V) as recommended by Staff.
3. KCP&L Greater Missouri Operations Company is granted a waiver of Commission Rule 4 CSR 240-20.100(3)(J) as recommended by Staff.
4. This order shall be effective on October 4, 2019.
5. This file shall be closed on October 5, 2019.



**BY THE COMMISSION**

A handwritten signature in dark ink, reading "Morris L. Woodruff". The signature is fluid and cursive.

Morris L. Woodruff  
Secretary

Silvey, Chm., Kenney, Hall, Rupp, and  
Coleman, CC., concur.

Pridgin, Regulatory Law Judge