

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

In the Matter of KCP&L Greater Missouri Operations)
Company's Submission of Its 2018 Renewable) **File No. EO-2019-0316**
Energy Standard Compliance Report)

**STAFF REPORT ON GMO'S
2018 RENEWABLE ENERGY STANDARD COMPLIANCE REPORT**

COMES NOW the Staff of the Missouri Public Service Commission and submits its *Staff Report on GMO's 2018 Annual Renewable Energy Standard Compliance Report* as ordered by the Commission. In support thereof, Staff states as follows:

1. On April 15, 2019, KCP&L Greater Missouri Operations Company ("GMO" or "Company") filed its Renewable Energy Standard ("RES") Compliance Report ("2018 Compliance Report") for calendar year 2018 as required by rule. The Company also requested a limited waiver from the requirements of Rule 4 CSR 240-20.100(8)(A)1.I.(V) to substitute invoices or another reasonable substitute when meter readings are not available.¹

2. Commission rule 4 CSR 240-20.100(8) states:

...Each electric utility shall file an RES compliance report no later than April 15 to report on the status of both its compliance with the RES [renewable energy standard] and its compliance plan as described in this section for the most recently completed calendar year...

3. Rule 4 CSR 240-20.100(8)(A) specifies what information the utility must provide in its annual RES Compliance Report.

4. Rule 4 CSR 240-20.100(8)(D) provides that:

The staff of the commission shall examine each electric utility's annual RES compliance report and RES compliance plan and file a report of its review with the commission within forty-five (45) days of the filing of the annual

¹ Staff does not oppose the limited waiver request, as discussed in the attached Memorandum.

RES compliance report and RES compliance plan with the commission. The staff's report shall identify any deficiencies in the electric utility's compliance with the RES.

5. On April 17, 2019, the Commission issued its *Order Directing Notice And Filing*, directing the Staff to file a report of its review of the Company's 2018 Compliance Report no later than May 30, 2019.

6. Staff has conducted its review of GMO's 2018 RES Compliance Report and has 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 4 CSR 240-20.100(3)(J). This is addressed in further detail in Staff's report which is contained in its *Memorandum*, attached hereto and incorporated herein by reference.

WHEREFORE, Staff submits its report for the Commission's information and consideration regarding GMO's 2018 RES Compliance Report.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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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 30th day of May, 2019.

/s/ Jeffrey A. Keevil