

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

In the Matter of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West’s Submission of Its 2019) File No. EO-2020-0330
Renewable Energy Standard Compliance Report)

**EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST APPLICATION FOR
VARIANCE FROM COMMISSION RULE 20 CSR 4240-20.100(3)(J)**

COME NOW Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) (collectively the “Companies”), and for their *Application for Variance From 20 CSR 4240 20.100(3)(J)* (“Application”), states as follows:

1. On April 15, 2020, the Companies filed their respective 2019 Renewable Energy Standard (“RES”) Compliance Reports (“2019 RES Reports”) in the above-captioned dockets.

2. As noted in the 2019 RES Reports, certain Renewable Energy Credits (“RECs”) were due to be retired by the end of 2019. However, because of an oversight, 90% of the 2019 RECs were not retired until January 2020. These 2020 retired RECs were labeled as 2019 compliance in the RES Reports.

3. 20 CSR 4240 20.100(3)(J), states in part:

For compliance purposes, electric utilities shall retire RECs in sufficient quantities to meet the RES portfolio requirements of this rule. The RECs shall be retired during the calendar year for which compliance is sought. Electric utilities may retire RECs from January 1 through April 15 of the following year, following the calendar year for which compliance is being sought and designate those retired RECs as counting towards the requirements of that previous calendar year. Any RECs retired in this manner shall be specifically annotated in the registry designated in accordance with subsection (F) of this section and the annual compliance report filed

in accordance with section (7) of this rule. RECs retired from January 1 through April 15 of the following year, to be counted towards compliance for the previous calendar year in accordance with this subsection shall not exceed ten percent (10%) of the total RECs necessary to be retired for compliance for that calendar year.

4. As such, in addition to the waivers requested in the Companies' respective 2019 RES Reports, the Companies also request that the Commission grant a limited variance of the requirement cited in Paragraph 3 above which provides that RECs retired in the January to April time period for a previous year's RES compliance shall not exceed 10 percent of the total RECs needed for compliance. Due to an administrative error, 90 percent of the total RECs needed for 2019 compliance were retired in January 2020.

5. Good cause exists for the granting of this variance. The Company would have retired the RECs in 2019 but for its oversight. With this variance the Company will be in compliance with the Commission's REC rules.

WHEREFORE, the Companies request the Commission grant this Application and issue an order waiving the requirements of 20 CSR 4240 20.100(3)(J).

Respectfully submitted,

/s/ Roger W. Steiner

Robert J. Hack, MBN 36496

Phone: (816) 556-2791

E-mail: rob.hack@evergy.com

Roger W. Steiner, MBN 39586

Phone: (816) 556-2314

E-mail: roger.steiner@evergy.com

Evergy, Inc.

1200 Main – 16th Floor

Kansas City, Missouri 64105

Fax: (816) 556-2787

**Attorney for Evergy Missouri Metro and Evergy
Missouri West**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand delivered, emailed or mailed, postage prepaid, this 24th day of April 2020, to all parties of record.

/s/ Roger W. Steiner

Roger W. Steiner