

**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 2021) File No. EO-2022-0285
Renewable Energy Standard Compliance Report)

In the Matter of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West’s Submission of Its 2021) File No. EO-2022-_____
Renewable Energy Standard Compliance Report)

**RENEWABLE ENERGY STANDARD COMPLIANCE REPORT
AND REQUEST FOR VARIANCE**

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 “Company”), and provides its Renewable Energy Standard (“RES”) Compliance Report. The Company also requests a limited variance for a portion of the Missouri Public Service Commission’s (“Commission”) RES Rules, found at 20 CSR 4240-20.100(8)(A)1.I.(V), and states as follows:

1. As part of its efforts to comply with Missouri’s RES law, the Company is purchasing Renewable Energy Credits (“RECs”) from various vendors.
2. For RECs purchased from a renewable energy resource not owned by the Company, 20 CSR 4240-20.100(8)(A)1.I.(V) requires all meter readings used for calculation of the payments from the electric utility to the owner of the facility.
3. The Company requests that the Commission grant it a limited variance of this requirement because the meter reading information is not provided by the vendors that the Company purchases RECs from. As it did last year, the Company is providing the invoice information requested by Staff.
4. Good cause exists for the granting of this limited variance, as the meter readings are not available.

5. The Company applied for a similar limited variance in 2018 (File Nos. EO-2019-0315 and EO-2019-0316)¹ which was granted by the Commission in its separate *Order[s] Regarding 2018 RES Compliance Report and Granting Waiver* issued in separately both dockets on September 4, 2019.

6. The Company also applied for a similar limited variance in 2020 (File Nos. EO-2020-0329 and EO-2020-0330) which was supported by Staff (“Staff”) for the Commission in its *Supplemental Report EMM and EMV Request for a Limited Waiver from Commission Rule 20 CSR 4240-20.100(8)(A)1.I.(V)*, filed in both of these dockets on October 8, 2020.²

7. The Company also applied for a similar limited variance in 2021 (File Nos. EO-2020-0345 and EO-2020-0346) which was supported by Staff (“Staff”) for the Commission in its *Staff Report on 2020 Annual Renewable Energy Standard Compliance Report*, filed in each of these respective dockets on June 22, 2021.³

WHEREFORE, the Company requests the Commission grant it a limited waiver of the meter readings requirement 20 CSR 4240-20.100(8)(A)1.I.(V).

¹ Both of these prior dockets related to Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”), respectively, however, effective October 7, 2019, Evergy Metro Inc. d/b/a Evergy Missouri Metro adopted the service territory and tariffs of KCP&L and Evergy Missouri West, Inc. d/b/a Evergy Missouri West adopted the service territory and tariffs of GMO.

² As of the filing of this document, the Commission has not issued an official order in these dockets.

³ As of the filing of this document, the Commission has not issued an official order in these dockets.

Respectfully submitted,

/s/ Roger W. Steiner

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**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 15th day of April 2022, to all parties of record.

/s/ Roger W. Steiner

Roger W. Steiner


DECLARATION OF JAMES FERNEAU

County of Jackson)
) ss
State of Missouri)

James Ferneau, being duly sworn, deposes and says that the information accompanying the attached “2021 RES Compliance Report,” was prepared by him or under his direction and supervision.

Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.¹

Evergy, Inc.



James Ferneau, Declarant

¹ See Letter from the Commission, dated March 24, 2020: “[A]ny person may file an affidavit in any matter before the Commission without being notarized so long as the affidavit contains the following declaration: [‘]Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.[’] _____ Signature of Declarant[.] This guidance applies both to pleadings filed in cases before the Commission and to required annual reports and statements of income.”