

**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 2020) File No. EO-2021-0345
Renewable Energy Standard Compliance Report)

In the Matter of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West’s Submission of Its 2020) File No. EO-2021-0346
Renewable Energy Standard Compliance Report)

In the Matter of Evergy Metro, Inc. d/b/a Evergy)
Missouri Metro's Submission of its 2021) File No. EO-2021-0347
Renewable Energy Standard Compliance Plan)

In the Matter of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West's Submission of its 2021) File No. EO-2021-0348
Renewable Energy Standard Compliance Plan)

**NOTICE OF FILING
REVISED 2020 RENEWABLE ENERGY STANDARD COMPLIANCE REPORTS
AND REVISED 2021 RENEWABLE ENERGY STANDARD COMPLIANCE PLANS**

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 their respective REVISED 2020 Renewable Energy Standard (“RES”) Compliance Reports (“Revised Reports”) and 2021 REVISED RES Compliance Plans (“Revised Plans”) to the Missouri Public Service Commission (“Commission”). In support thereof, the Company states as follows:

1. On April 15, 2021 Evergy Missouri Metro and Evergy Missouri West submitted their respective 2020 RES Compliance Reports (“Original Reports”) and 2021 RES Compliance Plans (“Original Plans”) to open the above-captioned dockets.
2. After filing, errors were discovered in both the Original Reports and Original Plans.
3. The Company submits the included Revised Reports and Revised Plans to correct the errors, both in response to the respective Staff (“Staff”) Reports in each docket, and pursuant

to the Commission's *Order[s] Directing Responses* issued in their respective dockets on June 24, 2021.

WHEREFORE, the Company submits its Revised Reports and Revised Plans.

Respectfully submitted,

/s/ Roger W. Steiner

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 7th day of July 2021, to all parties of record.

/s/ Roger W. Steiner

Roger W. Steiner

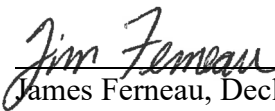
DECLARATION OF JAMES FERNEAU

County of Jackson)
) ss
State of Missouri)

James Ferneau, being duly sworn, deposes and says that the information accompanying the attached document 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.”

EVERGY MISSOURI WEST

**2020 ANNUAL RENEWABLE ENERGY
STANDARD COMPLIANCE REPORT**

April 2021 (Revised July 7, 2021)



TABLE OF CONTENTS

SECTION 1: INTRODUCTION.....	1
SECTION 2: RES COMPLIANCE REPORT	3
2.1 RULE (8) (A) 1 A:.....	4
2.2 RULE (8) (A) 1 B:.....	4
2.3 RULE (8) (A) 1 C:	4
2.4 RULE (8) (A) 1 D:	5
2.5 RULE (8) (A) 1 E:.....	5
2.6 RULE (8) (A) 1 F:.....	6
2.7 RULE (8) (A) 1 G:	6
2.8 RULE (8) (A) 1 H:	6
2.9 RULE (8) (A) 1 I:.....	6
2.10 RULE (8) (A) 1 J:.....	7
2.11 RULE (8) (A) 1 K:.....	7
2.12 RULE (8) (A) 1 L:.....	8
2.13 RULE (8) (A) 1 M:.....	8
2.14 RULE (8) (A) 1 N:	8
2.15 RULE (8) (A) 1 O:	8
2.16 RULE (8) (A) 1 P:.....	8

TABLE OF TABLES

Table 1: EMW Jurisdictional Renewable Energy4
Table 2: EMW Owned Renewable Electrical Energy5
Table 3: EMW REC Activity5

SECTION 1: INTRODUCTION

Eergy Missouri West (“EMW” or “Company”), a Delaware Corporation, has filed its 2020 Annual Renewable Energy Standard Compliance Report in compliance with the Missouri Public Service Commission’s (“Commission”) Electric Utility Renewable Energy Standard Requirements [4 CSR 240-20.100] (“Rule”) that became effective September 30, 2010. Section (8) of the rule requires that each public utility file with the Commission a Renewable Energy Standard (RES) Compliance Report by April 15 of each year.

Specifically, Section 8 (A) of the rule requires the following information for the most recently completed calendar year.

- A. Total retail electric sales for the utility, as defined by the Rule;
- B. Total jurisdictional revenue from the total retail electric sales to Missouri customers as measured at the customers’ meters;
- C. Total retail electric sales supplied by renewable energy resources, as defined by section 393.1025(5), RSMo, including the source of the energy;
- D. The number of RECs (Renewable Energy Credits) and S-RECs (Solar Renewable Energy Credits) created by electrical energy produced by renewable energy resources owned by the electric utility. For the electrical energy produced by these utility-owned renewable energy resources, the value of the energy created. For the RECs and S-RECs, a calculated REC or S-REC value for each source and each category of REC;
- E. The number of RECs acquired, sold, transferred, or retired by the utility during the calendar year;

- F. The source of all RECs acquired during the calendar year;
- G. The identification, by source and serial number, of any RECs that have been carried forward to a future calendar year;
- H. An explanation of how any gains or losses from sale or purchase of RECs for the calendar year have been accounted for in any rate adjustment mechanism that was in effect for the electric utility;
- I. For acquisition of electrical energy and/or RECs from a renewable energy resource that is not owned by the electric utility, except for systems owned by customer generators, the following information for each resource that has a rated capacity of ten (10) kW or greater:
 - I. Facility, city, state, and owner
 - II. That the energy was derived from an eligible renewable energy technology and that the renewable attributes of the energy have not been used to meet the requirements of any other local or state mandate;
 - III. The renewable energy technology utilized at the facility;
 - IV. The dates and amounts of all payments from the electric utility to the owner of the facility; and
 - V. All meter readings used for calculation of the payments referenced in part (IV) of this paragraph;
- J. For acquisition of electrical energy and/or RECs from a customer generator:
 - I. Zip Code
 - II. Name of aggregated subaccount in which RECs are being tracking in;
 - III. Interconnection Date
 - IV. Annual estimated or measured generation; and

- V. The start and end date of any estimated or measured RECs being acquired.
- K. The total number of customers that applied and received a solar rebate in accordance with section (4) of the Rule;
- L. The total number of customers that were denied a solar rebate and the reason(s) for denial;
- M. The amount of funds expended by the electric utility for solar rebates, including the price and terms of future S-REC contracts associated with the facilities that qualified for the solar rebates;
- N. An affidavit documenting the electric utility's compliance with the RES Compliance Plan as described in this section during the calendar year.
- O. If compliance was not achieved, an explanation why the electric utility failed to meet the RES; and
- P. A calculation of its actual calendar year retail rate impact.

This 2020 Report represents EMW's renewable compliance efforts to achieve the requirements of 4 CSR 240-20.100.

SECTION 2: RES COMPLIANCE REPORT

Rule (8) (A) 1: The annual RES compliance report shall provide the following information for the most recently completed calendar year, as defined by the Rule.

2.1 RULE (8) (A) 1 A:

Total retail electric sales for the utility, as defined by the Rule;

EMW 2020 Retail Sales (kWh)
7,979,927,241

2.2 RULE (8) (A) 1 B:

Total jurisdictional revenue from the total retail electric sales to Missouri customers as measured at the customers' meter;

EMW 2020 Revenue from Retail Electric Sales
\$751,000,281

2.3 RULE (8) (A) 1 C:

Total retail electric sales supplied by renewable energy resources, as defined by section 393.1025(5), RSMo, including the source of the energy;

Renewable generation reported in 2020 for EMW is based on commercial operation date.

Table 1: EMW Jurisdictional Renewable Energy

Facility	Energy (MWh)
Gray County Wind	210,851
Ensign Wind	446,122
Osborn Wind	276,692
Prairie Queen	347,589
Pratt	575,500
Rock Creek Wind	437,894
Cimarron Bend 3	3,810
St. Joseph Landfill Gas	10,197
Greenwood Solar	4,651
Solar Rebates	45,386

2.4 RULE (8) (A) 1 D:

The number of RECs and S-RECs created by electrical energy produced by renewable energy resources owned by the electric utility. For the electrical energy produced by these utility-owned renewable energy resources, the value of the energy created. For the RECs and S-RECs, a calculated REC or S-REC value for each source and each category of REC;

Table 2: EMW Owned Renewable Electrical Energy

Facility	RECs produced by owned renewable energy resources	Value of Energy	Calculated Value
St. Joseph Landfill Gas	10,197	\$195,770	\$0
Greenwood Solar	4,651	\$122,561	\$0

The RECs created from the St. Joseph Landfill Gas and Greenwood Solar facilities are reflected on the accounting records at zero value since they are an additional benefit from generation that is already in the existing rate structure.

2.5 RULE (8) (A) 1 E:

The number of RECs acquired, sold, transferred, or retired by the utility during the calendar year;

EMW utilizes the North American Renewable Registry (“NARR”) as recommended by Missouri Public Service Commission Staff and approved by the Commission for tracking of all RECs.

Table 3: EMW REC Activity

	2020 RECs	2020 S-RECs
Acquired	2,298,458	45,386
Sold	0	0
Transferred	0	0
Retired	678,671	12,768

*Missouri Equivalent RECs and S-RECs are 782,033 and 15,960 respectively

2.6 RULE (8) (A) 1 F:

The source of all RECs acquired during the calendar year;

Please refer to Attachment A of this document for a list of sources for RECs acquired during the calendar year 2020. Net metered accounts added in 2020 are included in Attachment B.

2.7 RULE (8) (A) 1 G:

The identification, by source and serial number, of any RECs that have been carried forward to a future calendar year;

Please refer to Attachment C of this document for a list of RECs carried forward to a future calendar year by source and serial number.

2.8 RULE (8) (A) 1 H:

An explanation of how any gains or losses from sale or purchase of RECs for the calendar year have been accounted for in any rate adjustment mechanism that was in effect for the electric utility;

There were no sales or purchases of RECs outside of those bundled with purchased power or from qualified customer generator's operational solar electric systems as a condition of receiving solar rebates.

2.9 RULE (8) (A) 1 I:

For acquisition of electrical energy and/or RECs from a renewable energy resource that is not owned by the electric utility, except for systems owned by customer generators, the following information for each resource that has a rated capacity of ten (10) kW or greater;

Please refer to Attachment A for a resource list which includes facility, city, state, and owner, and renewable technology used. Attachment D provides the payments

to the facility owners as well as the corresponding copies of the invoices from the facility owners.

Gray County Wind, Ensign Wind, and Osborn Wind designated EMW as the NARR Generator Owner's Designation of Responsible Party which represents that the generator owner has not granted similar authority or permission to any other person for use in North American Renewables Registry or any similar registry or tracking system.

The only S-RECs acquired in 2020 were from qualified customer-generator's operational solar electric systems as a condition of receiving solar rebates.

2.10 RULE (8) (A) 1 J:

For acquisition of electrical energy and/or RECs from a customer generator;

Please refer to Attachment B for a resource list of customer generators added in 2020 which includes zip code, name of aggregated subaccount in which RECs are being tracked, interconnection date, annual estimated or measured generation, and the start and end date of any estimated or measured RECs being acquired in the reporting year. Annual estimates are utilized for non-metered generation.

S-RECs acquired in 2020 were from qualified customer generator's operational solar electric systems as a condition of receiving solar rebate.

2.11 RULE (8) (A) 1 K:

The total number of customers that applied and received a solar rebate in accordance with section (4) of the Rule;

EMW 2020	
Number of customers applying for and receiving a solar rebate	450

2.12 RULE (8) (A) 1 L:

The total number of customers that were denied a solar rebate and the reason(s) for denial;

EMW 2020	
Number of customers denied receiving a solar rebate	124
Reason: Lack of available funds	

2.13 RULE (8) (A) 1 M:

The amount of funds expended by the electric utility for solar rebates, including the price and terms of future S-REC contracts associated with the facilities that qualified for the solar rebates;

EMW 2020	
Solar rebates	\$1,633,874

2.14 RULE (8) (A) 1 N:

An affidavit documenting the electric utility's compliance with the RES compliance plan as described in this section during the calendar year;

See affidavit included with document.

2.15 RULE (8) (A) 1 O:

If compliance was not achieved, an explanation why the electric utility failed to meet the RES;

EMW has successfully met the Renewable Energy Standard.

2.16 RULE (8) (A) 1 P:

A calculation of its actual calendar year retail rate impact.

Based upon a 10-year average, the RES Retail Rate Impact for 2020 was (0.372%). As outlined in EMW's 2021 Renewable Energy Standard Compliance Plan, filed April 15, 2021 and revised in June 2021, EMW asserts that the RES Retail Rate

Impact calculation does not present an accurate or complete picture of the investments that EMW has made in renewable energy and that the rate impact of RES spending is closer to or above 1%. For 2020, EMW's Retail Revenues is \$751,000,281; the total RES compliance cost for 2020 is \$2,274,891. Then by dividing the total RES compliance cost by EMW 2020 Retail Revenues, the retail rate impact for 2020 can be calculated:

$$= \$2,274,891 / \$751,000,281 = 0.303\%.$$