DEFORE 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 Renewable Energy Standard Compliance Report)))	File No. EO-2022-0285
In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's Submission of its 2022 Renewable Energy Standard Compliance Plan)))	File No. EO-2022-0287

MOTION FOR EXTENSION OF TIME TO FILE STAFF REPORTS

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission, by and through counsel, and for its *Motion for Extension of Time to File Staff Reports*, states as follows:

- 1. On April 15, 2022, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (hereafter "Evergy Metro" or "Company") filed its 2021 Renewable Energy Standard (RES) Compliance Report ("Report") and 2022 Annual RES Compliance Plan ("Plan") as required by 20 CSR 4240-20.100(8). Evergy Metro also requested a variance from 20 CSR 4240-20.100(8)(A)1.I(V).
- 2. Thereafter, the Commission ordered Staff to review the Report and Plan and file a report and any objections to Every Metro's request for a variance due no later than May 31, 2022.
- 3. On May 13, 2022, the Missouri Department of Natural Resources, Division of Energy filed an Application to Intervene.
 - 4. Staff has and will continue to issue data requests to aid in its review.

- 5. While reviewing Evergy Metro's 2021 RES Compliance Report, 2022 RES Compliance Plan, and responses to Staff's DRs, Staff discovered there were deficiencies in the information provided and inconsistencies between the Report and the North American Renewables Registry and between the Plan and the Company's responses. Staff has reached out to Evergy Metro, and the Company is in the process of responding to Staff's inquiries. Staff requests additional time to review additional, follow-up information and determine if further information is needed from Evergy Metro as a result.
- 6. Staff requests an extension of 45 days, to file its Staff Report on Evergy Metro's 2021 RES Compliance Report and 2022 RES Compliance Plan.
- 7. Counsel for Evergy Metro, the Office of the Public Counsel have been contacted regarding this motion and neither party object to the granting of an extension of time in this matter.
- 8. This motion is made in the interest of justice and without the intent to unreasonably delay or hinder these proceedings in any manner

WHEREFORE, Staff respectfully submits this *Motion for Motion for Extension of Time to File Staff Reports* for the Commission's consideration and hereby prays the Commission grant Staff an additional 45 days to file its recommendation in this matter; and to grant such other and further relief as the Commission considers reasonable under the circumstances.

Respectfully submitted,

/s/ Carolyn H. Kerr

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 23rd day of May, 2022.

/s/ Carolyn H. Kerr