

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

In the Matter of Evergy Missouri West, Inc. )  
d/b/a Evergy Missouri West’s Submission of ) **File No. EO-2024-0298**  
Its 2024 Renewable Evergy Standard )  
Compliance Plan )

In the Matter of Evergy Metro, Inc. d/b/a )  
Evergy Missouri Metro’s Submission of Its ) **File No. EO-2024-0299**  
2024 Renewable Energy Standard )  
Compliance Plan )

In the Matter of Evergy Missouri West, Inc. )  
d/b/a Evergy Missouri West’s Submission of ) **File No. EO-2024-0300**  
Its 2023 Renewable Evergy Standard )  
Compliance Report )

In the Matter of Evergy Metro, Inc. d/b/a )  
Evergy Missouri Metro’s Submission of Its ) **File No. EO-2024-0301**  
2023 Renewable Energy Standard )  
Compliance Report )

**STAFF’S REPORT AND RECOMMENDATION**

Evergy Missouri West, Inc. d/b/a Evergy Missouri West and Evergy Metro, Inc. d/b/a Evergy Missouri Metro (collectively, Evergy) have filed their 2023 Renewable Energy Standard (RES) Compliance Reports (Reports) and 2024 Annual RES Standard Compliance Plans (Plans), as required by Commission Rule 20 CSR 4240-20.100(8). Additionally, in Files EO-2024-0300 and EO-2024-0301, Evergy has requested a variance from 20 CSR 4240-20.100(8)(A)1.I(V) regarding the provision of meter readings used in the calculation of payments for renewable energy credits to various renewable energy resource vendors. On April 17,<sup>1</sup> the Commission ordered Staff to review the RES compliance reports and plans and file a report no later than May 31.

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<sup>1</sup> All date references are to 2024 unless otherwise indicated.

Rule 20 CSR 4240-20.100 (8) (A) sets out the requirements for the Annual RES Compliance Report, and Rule 20 CSR 4240-20.100 (8) (B) sets out the requirement for the RES Compliance Plan. On April 15, Evergy Missouri West filed its Plan in File No. EO-2024-0298 for calendar years 2024 through 2026 to comply with the Rule 20 CSR 4240-20.100(8), Electric Utility Renewable Energy Standard Requirements. On April 16, Evergy Missouri Metro filed its Plan in File No. EO-2024-0299 for calendar years 2024 through 2026 to comply with that rule. On April 15, Evergy Missouri West filed its 2023 Annual Renewable Energy Standard Compliance Report in File No. EO-2024-0300 to comply with the rule. On April 16, Evergy Metro Missouri filed its 2023 Annual Renewable Energy Standard Compliance Report in File EO-2024-0301 to comply with the Rule.

The Official Case File Memoranda filed contemporaneously with this pleading set out, respectively for Files EO-2024-0298, EO-2024-0299, EO-2024-0300, and EO-2024-0301, Staff's investigation and findings for each of the subparts 20 CSR 4240-20.100(8)(A) and (B); and, respectively for each of those files, Staff's recommendations.

#### **EO-2024-0298**

With respect to File EO-2024-0298, Staff concludes that Evergy Missouri West's 2024 Annual Renewable Energy Standard Compliance Plan has met the minimum requirements of Subparagraphs 20 CSR 4240-20.100(8)(B).

### **EO-2024-0299**

With respect to File EO-2024-0299, Staff concludes that Evergy Missouri Metro's 2024 Annual Renewable Energy Standard Compliance Plan has met the minimum requirements of 20 CSR 4240-20.100(8)(B).

### **EO-2024-0300**

Staff reviewed Evergy Missouri West's 2023 Annual Renewable Energy Standard Compliance Report filed on April 15, 2024. Staff utilized the North American Renewables Registry to independently verify the retirement of the renewable energy credits and solar renewable energy credits by Evergy Missouri West for its 2023 RES compliance.<sup>2</sup> Although Evergy Missouri West has achieved compliance with the RES requirements for the 2023 compliance year, Staff noted an error in its 2023 Renewable Energy Standard Compliance Report and recommends that Evergy Missouri West file a corrected Report. Staff's memorandum states:

- EMW [Evergy Missouri West] 534,479 RECs (2023 vintage) from Pratt Wind, this differs from the \*\* [REDACTED] \*\* RECs listed in NAR (2023 vintage).

The rule requires electronic copies of the RES compliance report be posted on both the utility's website and on the Commission's website for public access. Staff recommends the Commission order EMW to file a corrected report and update its website so the public has access to accurate information. Additionally, Staff recommends EMW include any tables needed to reconcile their report with NAR as part of its future filings.

Regarding Evergy Missouri West's request for a variance, Rule 20 CSR 4240-20.100 (8)(A)1.i.(V) requires that 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, certain information must be provided, including

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<sup>2</sup> <http://narecs.com>.

“[a]ll meter readings used for calculation of the payments referenced in part (IV) of this paragraph.” Part IV requires information concerning “[t]he dates and amounts of all payments from the electric utility to the owner of the facility.” Rule 20 CS 4240-20.100 (11) provides: “Variances. Upon written application, and after notice and an opportunity for hearing, the commission may grant a variance from any provision of this rule for good cause shown.”

Staff recommends the Commission grant Evergy Missouri West a limited variance from the requirements of Rule 20 CSR 4240-20.100(8)(A)1.I.(V) to substitute invoices or another reasonable substitute when meter readings are not available for energy purchases from Gray County, Ensign, Osborn, Prairie Queen, Pratt, Rock Creek, and Cimarron Bend III wind farms.

#### **EO-2024-0301**

Staff reviewed Evergy Metro Missouri’s 2023 Annual Renewable Energy Standard Compliance Report on April 16, 2024. Based on its review of the Report, Staff has not identified any deficiencies. Staff utilized the North American Renewables Registry to independently verify the retirement of the Renewable Energy Credits and Solar-Renewable Energy Credits by Evergy Missouri Metro for its 2023 Renewable Energy Standard compliance.<sup>3</sup> Evergy Missouri Metro has achieved compliance with the RES requirements of Rule 20 CSR 4240-20.100(8)(A)1 for the 2023 compliance year.

Staff recommends the Commission grant Evergy Missouri Metro a limited variance from the requirements of Rule 20 CSR 4240-20.100(8)(A)1.I.(V) to substitute invoices or another reasonable substitute when meter readings are not available for energy

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<sup>3</sup> <http://narecs.com/>.

purchases from Spearville, Cimarron, Slate Creek, Osborn, Waverly, Prairie Queen, Ponderosa, Rock Creek, and Pratt wind farms.

**WHEREFORE**, Staff prays that the Commission accept this report and recommendation as complying with the Commission's Orders.

Respectively Submitted,

/s/ Paul T. Graham

Paul T. Graham #30416  
Senior Staff Counsel  
P.O. Box 360  
Jefferson City, Mo 65102-0360  
(573) 522-8459  
[Paul.graham@psc.mo.gov](mailto:Paul.graham@psc.mo.gov)

Attorneys for the Staff of the  
Missouri Public Service Commission

### **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 as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 31<sup>st</sup> day of May, 2024.

/s/ Paul T. Graham