

**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)

**EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST
RESPONSE TO OPC STATUS REPORT**

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, for their *Reply* (“Reply”) to the Office of the Public Counsel’s (“OPC”) *Status Report* (“Status Report”) filed in the above-captioned dockets on October 18, 2021, states as follows:

1. In its brief Status Report, OPC asserts that it has concerns, “customers are paying in excess of the 1% cap.”¹ As the Company indicated in its previous response to OPC, the retail rate impact information presented in its Renewable Energy Standard (“RES”) compliance report is accurate, complies with the Commission rules and does not need to be updated. Commission Staff agrees that the Company has met the Commission’s RES Report and Plan requirements.²

¹ See, Status Report, p. 2, ¶2.

² See, Staff Reports dated June 22, 2021 in Docket Nos. EO-2021-0345, EO-2021-0346, and EO-2021-0348; and Staff Report dated Jun 1, 2021 in EO-2021-0347.

Moreover, the Commission has previously rejected OPC's previous request to make OPC's concerns about the 1% RES cap a part of the RES Report and Plan dockets.³

2. The Company does not believe that these proceedings are the appropriate dockets for the Commission to decide OPC's allegations as the issue can be appropriately raised in an ongoing or upcoming Fuel Adjustment Clause ("FAC") audit docket.

3. OPC's arguments concerning the prudence of past renewable resource decisions or the cost of renewable resources should be dealt with in a separate proceeding. For example, OPC made similar claims concerning whether certain economic wind resources were procured by the Company to meet RES requirements in Evergy Missouri West's 2018 Fuel Adjustment Clause prudence review (EO-2019-0067).

4. OPC also states in its Status Report that, "Due to the press of other business, the OPC has not completed its investigation."⁴ This is despite the fact that the Company first filed its relevant reports to open these dockets more than six months ago, back on April 15, 2021. Further, OPC insists they are "hopeful" to complete their investigation by December 17, 2021⁵, which will be more than eight months after the inception of these dockets, and requests that the dockets remain open. The Company requests the dockets be closed. Such closure will not impact OPC's ability to conduct and complete any investigation.

WHEREFORE, the Company respectfully submits its Response for the Commission's consideration.

³ See, EO-2019-0315, 0316(October 4, 2019) *Order Regarding 2018 RES Compliance Report and Granting Waiver*, where the Commission stated at p. 2: "After considering the submitted comments, the Commission concludes that no further order from the Commission is appropriate at this time regarding the RES Report."

⁴ *Id.*, p. 2, ¶3.

⁵ *Id.*, p. 2, ¶4.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorney for Evergy Missouri Metro and Evergy
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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 27th day of October 2021, to all parties of record.

/s/ Roger W. Steiner

Roger W. Steiner