

MEMORANDUM

TO: Missouri Public Service Commission Case File
Case No. EO-2025-0284, Evergy Metro, Inc d/b/a Evergy Missouri Metro's
Submission of its 2025 Renewable Energy Standard Compliance Plan

FROM: Matthew W. Lucas, Engineering Analysis

/s/ Matthew W. Lucas / 05/30/2024
Engineering Analysis / Date

SUBJECT: Staff Report and Conclusion on Evergy Missouri Metro's 2025 Annual RES
Compliance Plan

DATE: May 30, 2025

SUMMARY

Staff has reviewed Evergy Metro, Inc.'s ("EMM" or "Company") *2025 RES Compliance Plan* ("Plan"). Based on its review, Staff has not identified any deficiencies the Company's filing.

OVERVIEW

On April 15, 2025, the Company filed its Plan for calendar years 2025 through 2027, in accordance with Rule 20 CSR 4240-20.100(8), Electric Utility Renewable Energy Standard Requirements, Annual RES Compliance Report and RES Compliance Plan. This rule states, in part, "Each electric utility shall file an annual RES compliance plan with the commission. The plan shall be filed no later than April 15 of each year." Subparagraphs 20 CSR 4240-20.100(8)(B)1. A. through G. provide the minimum requirements for the plan. Subsection 20 CSR 4240-20.100(8)(D) requires that Staff examine the Plan and file a report within forty-five (45) days of the filing.

DISCUSSION

Staff reviewed the Company's Plan in accordance with the established requirements to verify the Plan contains the information required by the Rule. The results of this review are detailed below, with appropriate Rule subparagraphs A. through G. identified and quoted.

A. “A specific description of the electric utility’s planned action to comply with the RES;”

To meet its non-solar RES obligations from 2025 to 2027, the Company intends to use its existing purchased power agreements (“PPA”) for wind generation. EMM expects 2.2 million MWh of non-solar production from these PPAs. This production exceeds the anticipated non-solar requirement and the excess REC’s will be banked for future use as needed in future compliance years.

Because the Osborn and Rock Creek facilities are located in Missouri, the Company receives 1.25 REC’s for each MWh produced. Of EMM’s wind contracts, these are the only two that qualifies for the adder, though it does also apply to many of the Company’s solar generators.

To meet its solar RES (“SREC”) requirements, the Company intends to use SREC’s sourced primarily from its customer-generators. These customer-generators receives a rebate for building a qualified solar facility, and the Company receives the rights to the REC’s for a ten-year period. EMM also co-owns the Hawthorn Solar Project with Evergy Missouri West and its only utility scale solar generator at 10 MW, with 6 MW allocated to customer programs¹ and 4 MW² allocated towards RES compliance as needed. Together, the SREC’s available from these resources exceeds the solar RES requirement.

Together, these resources generate more REC’s than the Company requires for compliance. In 2025, the Company’s existing resources could supply an expected ** [REDACTED] ** of REC’s, but only 1,285,224 MWh of REC’s are expected to be needed for compliance. Similar surpluses are expected in 2026 and 2027, though the annual surplus does decrease over the planning period due to anticipated additional large load.

¹ 5 MW allocated for Evergy’s Solar Subscription program, and 1 MW to an income-qualified subscription program.

² Both Evergy Missouri West and Evergy Missouri Metro get 2 MW of this total.

B. “A list of executed contracts to purchase RECs (whether or not bundled with energy), including type of renewable energy resource, expected amount of energy to be delivered, and contract duration and terms;”

The Company provided the following information regarding its executed contracts:

	Type	Expected Energy Delivered (MWh)	Contract Effective Date	Contract Duration
Cimarron II	Wind	145,010	6/1/2012	20 years
Spearville 3	Wind	90,974	10/1/2012	20 years
Waverly	Wind	415,404	1/4/2016	20 years
Slate Creek	Wind	339,945	12/30/2015	20 years
Osborn	Wind	215,430	12/15/2016	20 years
Rock Creek	Wind	347,066	11/8/2017	20 years
Pratt	Wind	264,346	12/13/2018	20 years
Prairie Queen	Wind	151,232	8/10/2019	20 years

C. “The projected total retail electric sales for each year;”

The Company provided annual projected retail electric sales through 2027 in its Plan, and additional years in its Attachment A. These projections are consistent with its most recent IRP update³ and past RES Plan filings.

³ EO-2025-0250. Item 1, March 13, 2025.

- D. “Any differences, as a result of RES compliance, from the utility’s preferred resource plan as described in the most recent electric utility resource plan filed with the commission in accordance with 4 CSR 240-22, Electric Utility Resource Planning;”**

Since the Company intends meet its RES compliance goals through existing resources, there are no differences between its 2025-2027 RES plan and the 2025 IRP update provided on March 13, 2025.

- E. “A detailed analysis providing information necessary to verify that the RES compliance plan is the least cost, prudent methodology to achieve compliance with the RES;”**

The Company provided information regarding its utilization of existing resources to comply with both the solar non-solar portion of the RES for 2025 through 2027. The costs associated with these resources are already included in revenue requirements. Additionally, many of the wind PPAs were pursued, according to the Company, for economic reasons rather than RES compliance, so they do not count towards the rate impact cap.

Staff does not find any deficiencies in the Company’s filing at this time. However, Staff wants it to be clear that when it states it has not identified any deficiencies in EMM’s filing, Staff has not made a ratemaking determination whether the Plan is the least cost, prudent method in complying with the RES, and suggests the Commission be clear in any Order it may issue in this case that it is not making any ratemaking determination.

- F. “A calculation of the RES retail rate impact (“RRI”) limit calculated in accordance with section (5) of this rule. The calculation should be accompanied by workpapers including all the relevant inputs used to calculate the retail rate impact limits for the planning interval which is included in the RES compliance plan. The electric utility may designate all or part of those calculations as highly confidential, proprietary, or public as appropriate under the commission’s rules;”**

The Company provided its RRI calculation as Attachment A in its filing, and the calculations result in an average rate impact of ** [REDACTED]

[REDACTED] ** over the planning period.

- G. “Verification that the utility has met the requirements for not causing undue adverse air, water, or land use impacts pursuant to subsection 393.1030.4. RSMo, and the regulations of the division.”**

The Company attests in its Plan that “All generating facilities utilized by EMM to meet the requirements of the Missouri RES have, to its knowledge, received all necessary environmental and operational permits and are in compliance with any necessary federal, state and/or local requirements related to air, water and land use.”

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc.)	
d/b/a Evergy Missouri Metro's)	File No. EO-2025-0284
Submission of its 2025 Renewable)	
Energy Standard Compliance Plan)	

AFFIDAVIT OF MATTHEW W. LUCAS

STATE OF MISSOURI)	
)	ss.
COUNTY OF COLE)	

COMES NOW MATTHEW W. LUCAS and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Report* in memorandum form; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

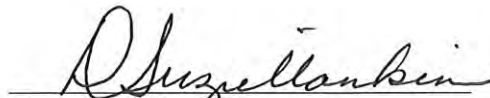


MATTHEW W. LUCAS

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 27th day of May 2025.





Notary Public