

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. EO-2025-0282, Evergy Missouri Metro's
Submission of Its 2024 Renewable Energy Standard Compliance Report

FROM: Amanda Arandia May 30, 2025
Engineering Analysis / Date

SUBJECT: Staff Report and Conclusion on Evergy Missouri Metro's 2024 Renewable Energy
Standard Compliance Report

DATE: May 30, 2025

SUMMARY

Evergy Metro Inc., d/b/a Evergy Missouri Metro ("EMM") filed its *2024 Annual Renewable Energy Standard Compliance Report* ("Report") on April 15, 2025. Based on its review of the Report, Staff has not identified any deficiencies.

Regarding EMM's request for waiver, Staff recommends the Commission grant EMM a limited waiver 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 Spearville 3, Cimarron, Slate Creek, Osborn, Waverly, Prairie Queen, Ponderosa, Rock Creek, and Pratt wind farms.

Staff utilized the North American Renewables Registry (NAR) to independently verify the retirement of the Renewable Energy Credits (RECs) and Solar-Renewable Energy Credits (S-RECs) by EMM for its 2024 Renewable Energy Standard (RES) compliance.¹ EMM has achieved compliance with the RES requirements for the 2024 compliance year.

OVERVIEW

On April 15, 2025, EMM filed its Report for calendar year 2024. The Report was filed in accordance with 20 CSR 4240-20.100(8), Electric Utility Renewable Energy Standard

¹ <http://narecs.com/>.

Requirements, Annual RES Compliance Report and RES Compliance Plan. This rule states, in part:

Each electric utility shall file a RES compliance report no later than April 15 to report on the status of both its compliance with the RES and its compliance plan as described in this section for the most recently completed calendar year.

Subparagraphs 20 CSR 4240-20.100(8)(A)1. A. through P. provide the minimum requirements for the Report. Subsection 20 CSR 4240-20.100(8)(D) requires that Staff examine EMM's Report and file a report within forty-five (45) days of the filing. On April 15, 2025, the Commission ordered Staff to file its report no later than May 30, 2025.

DISCUSSION

Staff has reviewed EMM's Report in accordance with the established requirements to verify that EMM has provided the information required by rule. The results of this review are detailed below, with appropriate rule subparagraphs A. through P. identified and quoted.

A. "Total retail electric sales for the utility, as defined by this rule;"

EMM provided the total retail electric sales for 2024 expressed as total megawatt-hours (MWh) sold to EMM consumers as 8,284,559 MWh. Staff checked this value in EMM's FERC Form 1 filing as well, BMAR-2025-1704. EMM reported 8,284,558 MWh in its FERC Form 1. This difference is likely due to rounding and EMM based its RES requirements on the larger value.

B. "Total jurisdictional revenue from the total retail electric sales to Missouri customers as measured at the customers' meters;"

EMM provided the total retail electric sales for 2024 expressed as annual operating revenues (dollars) from EMM consumers of \$903,532,876. This amount is consistent with the amount listed on the Missouri Jurisdictional 2024 FERC Form 1 filed with the Commission on May 15, 2024.

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

EMM provided the 2024 total retail electric sales by renewable resource based on its energy allocation presumption.

EMM utilized four (4) company-owned renewable energy generating facilities during 2024; Spearville 1, Spearville 2, Hawthorn Solar and Solar Aggregate 1.² EMM also has eight (8) operational purchase power agreements (“PPA”), with Spearville 3, LLC (“Spearville 3”), Cimarron Windpower II (“Cimarron”), Slate Creek Wind (“Slate Creek”), Waverly Wind Farm (“Waverly”), Osborn Wind Energy (“Osborn”), Prairie Queen Windfarm, LLC (“Prairie Queen”), Pratt Wind, LLC (“Pratt”), and Rock Creek Wind (“Rock Creek”). Additionally, EMM provided the total estimated generation (MWh) supplied by its newly interconnected customer-generators.

Reported MWh by Facility

	2024 (MWh) reported	NAR Project Account Holder
Spearville 1	50,872	Kansas City Power & Light
Spearville 2	24,889	Kansas City Power & Light
Solar Aggregate 1	46	Kansas City Power & Light
Spearville 3	96,472	Kansas City Power & Light
Cimarron II	143,611	Duke Energy Generations Services, Inc
Slate Creek Wind	291,873	Kansas City Power & Light
Waverly	441,247	Waverly Wind Farm, LLC
Osborn	240,029	Kansas City Power & Light
Prairie Queen	155,759	Prairie Queen Wind Farm, LLC
Pratt	240,952	NextEra Energy Resources
Rock Creek	370,844	Rock Creek Wind Project, LLC
Solar Rebates	57,992	Kansas City Power & Light
Hawthorn Solar	4,541	Kansas City Power & Light
TOTAL	2,119,127	

Staff was able to verify these RECs in NAR.

² Solar Aggregate 1 represents EMM’s small owned solar generation located in Missouri, which qualifies for the 1.25 credit multiplier per RSMo 393.1030.1; 20 CSR 4240-20.100(3)(G).

- 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;”**

EMM reported the number of RECs and S-RECs produced in 2024 and the value of energy created for each company-owned facility.

RECs Produced in 2024

Facility	Number of RECs	Compliance Equivalency ³	Value of Energy	Value of RECs
Spearville 1	50,872	n/a	\$2,239,294	0
Spearville 2	24,889	n/a	\$1,069,514	0
Solar Aggregate 1	46	58	\$1,379	0
Hawthorn Solar ⁴	4,541	5,676	\$146,440	0

EMM reports no value to its owned resources. However, Staff believes there is a value to the RECs and S-RECs created by EMM’s owned generation though that value is not transparent.

- E. “The number of RECs acquired, sold, transferred, or retired by the utility during the calendar year;”**

EMM provided the information regarding the number of RECs acquired, sold, transferred, and retired during the calendar year in Appendix E of its Report for all of the EMM assets together (solar and non-solar) and for each individual facility. Staff reviewed the information provided in Appendix E and confirmed its accuracy in NAR. The following table represents the number of RECs acquired, sold, transferred, and retired during the calendar year. While EMM did not specifically provide the

³ Renewable resources located in Missouri, qualifies for the one and twenty-five hundredths (1.25) credit multiplier allowed by statute and regulation; 393.1030.1., RSMo; 20 CSR 4240-20.100(3)(G).

⁴ Value reflects the EMM portion of Hawthorn Solar including the solar subscriber portion.

information as listed in this table, Staff was able to create this table using the information provided in Appendix E and simple addition.

RECs Acquired, Sold, Transferred or Retired in 2024

	Number of RECs (Compliance Equivalency)	Number of S-RECs (Compliance Equivalency)
Acquired	1,980,787 (2,133,505)	57,081 ⁵ (71,579)
Retired ⁶	1,139,063 (1,217,831)	19,884 (24,855)
Sold ⁷	680,000 (680,000)	
Transferred	0	0

EMM reported the sale of 680,000 RECs.

EMM retired 2021 vintage wind RECs from Spearville 1, Spearville 2, Spearville 3, Cimarron 2, Slate Creek, Waverly, Osborn, Prairie Queen, Pratt, and Rock Creek. Staff verified that EMM retired 1,217,831 (includes in-state factor for RECs generated in Missouri) to meet the non-solar requirement of 1,217,830.⁸ EMM also retired 24,855 S-RECs (includes in-state factor for customer-generated S-RECs) to meet the solar requirement of 24,854.⁹

⁵ 911 Solar RECs from customer generators are not currently registered in NAR.

⁶ In Appendix E, retirements for the 2024 calendar year are listed under the vintage year 2021 as “MO Compliance for 2024”.

⁷ EMM did not report the sale of any RECs from Rock Creek in 2024, however it has come to Staff’s attention that Ameren has publicly reported retiring RECs purchased from Rock Creek in 2024. (*Ameren Missouri Renewable Energy Standard Compliance Report 2024*, EO-2 025-0281 , page 10) Staff confirmed with EMM that these RECs were sold by Evergy Kansas Metro.

⁸ Pursuant to 20 CSR 4240-20.100(2)(C)1, the total amount of RECs necessary is determined by calculating fifteen percent of EMM’s total retail sales. The non-solar requirement is the total amount of RECs necessary to achieve compliance, less the solar requirement.

⁹ Pursuant to 20 CSR 4240-20.100(2)(D)1, the amount of S-RECs necessary is determined by calculating three-tenths percent (0.3%) of the total RES requirement.

These RECs were registered and retired in NAR utilized for compliance purposes. In accordance with statute and regulation, these RECs were produced by a qualified facility and were banked and utilized appropriately.¹⁰

F. “The source of all RECs acquired during the calendar year;”

EMM provided a resource list as Table 3 of the Report.

G. “The identification, by source and serial number, or some other identifier sufficient to establish the vintage and source of the REC, of any RECs that have been carried forward to a future calendar year;”

EMM provided a listing, by source and serial number, of RECs that are being carried forward for future year(s) as Appendix B of the Report. This list includes 2022, 2023, and 2024 vintage RECs.

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 utility;”

Revenues reflected in FERC account 509000 and gains or losses to be recorded in FERC accounts 411800 and 411900 from the sale of RECs that are not needed to meet the Missouri Renewable Energy Standard less the cost associated with making the sale.

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 name, location (city, state), and owner;”

EMM provided a resource list as Table 3 of the Report, which includes the name, location, and owner of the facilities.

¹⁰ Qualified facility per 393.1025(5), RSMo and 20 CSR 4240-20.100(1)(K); Banked RECs per 393.1030.2, RSMo and 20 CSR 4240-20.100(1)(J).

“(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;”

EMM notes that the Generator Owners for Osborn, Spearville 3 and Slate Creek have designated EMM as the Responsible Party in NAR, this represents that the generator owner has not granted similar authority to another person or entity in NAR or any other similar registry. Additionally, EMM provided the Responsible Party designation forms in response to Staff Data Request No. 0002.

The below table represents the facilities utilized for 2024 RES Compliance as listed on the MDNR list of Renewable Energy Standard Certified facilities¹¹:

Facility Listings in MDNR list of Renewable Energy Standard Certified Facilities

Facility Name	Certification Date	Location	Applicant	Total Nameplate Capacity (MW)
Spearville I - Wind Energy Facility	7/6/2011	Ford County, KS	Kansas City Power & Light Company (KCP&L)	100.5
Spearville II - Wind Energy Facility	7/6/2011	Ford County, KS	KCP&L	48
Cimarron II Wind Farm	10/5/2012	Gray County, KS	Cimarron Windpower II, LLC	131.1
Spearville 3, LLC	11/5/2012	Ford County, KS	KCP&L	100.8
Waverly Wind Farm, LLC	1/26/2016	Coffey County, KS	EDP Renewables North America, LLC	199
Slate Creek Wind Project	3/7/2016	Sumner County, KS	KCP&L	150
Osborn Wind Farm, LLC	3/14/2017	DeKalb County, MO	KCP&L & GMO	200
Rock Creek Wind Project	4/25/2018	Fairfax, MO	KCP&L	300
Pratt Wind, LLC	5/29/2019	Pratt, KS	GMO	244
Prairie Queen Wind Farm Project	8/1/2022	Moran, KS	Evergy, Inc.	200

¹¹ [Renewable Energy Standard \(RES\) Certification | Missouri Department of Natural Resources \(mo.gov\)](https://www.mo.gov/renewable-energy-standard-certification).

“(III) The renewable energy technology utilized at the facility;”

The renewable energy technology was included in Table 3.

“(IV) The dates and amounts of all payments from the electric utility to the owner of the facility; and”

The payments to the facility owners are provided in Appendix C of the Report.

“(V) All meter readings used for the calculation of the payments referenced in part (IV) of the paragraph;”

The required meter readings were not provided in the Report. EMM requested a limited waiver from this rule requirement (20 CSR 4240-20.100(8)(A)1.I.(V)) for purchased RECs, stating the meter reading information is not provided by the vendors from which EMM purchases RECs.

The purpose of this subparagraph is to demonstrate the validity of RECs and/or S-RECs obtained from sources that are not owned by the electric utility. Generation of renewable energy at company-owned resources is typically monitored by revenue quality meters and/or reported through an independent system operator. Resources to which this subparagraph applies are not necessarily monitored by the utility that seeks to retire the associated RECs for compliance purposes. This subparagraph compensates for the lack of utility ownership/control of the renewable energy resource.

The RECs associated with energy purchased from Spearville 3, Cimarron, Slate Creek, Osborn, Rock Creek, Waverly, Prairie Queen, and Pratt are registered in NAR. A Qualified Reporting Entity (QRE) is defined in NAR’s Operating Procedures as “an entity reporting meter reading and other generation data to the NAR Administrator.”

** [REDACTED] **

Since EMM is subject to a renewable energy standard, to qualify as a QRE in NAR, it must be able to demonstrate that there is an independent group responsible for reporting separate from the group which is engaged in marketing functions or REC retirement under the principles defined by the FERC’s Independent Functioning and

No Conduit Rules.¹² ** [REDACTED]

[REDACTED]¹³. **

Based on its review of the information provided by EMM and other sources, Staff recommends the Commission grant EMM a limited waiver from the requirements of Rule 20 CSR 4240-20.100(8)(A)1.I.(V) to substitute invoices, which were provided in Appendix C of the Report, or another reasonable substitute when meter readings are not available for energy purchases from Spearville 3, Cimarron, Slate Creek, Osborn, Rock Creek, Waverly, Prairie Queen, and Pratt.

J. “For acquisition of electrical energy and/or RECs from a customer-generator”

“(I) Location (zip code);”

“(II) Name of aggregated subaccount in which RECs are being tracked 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;”

The required information was provided in Appendix A of the Report.

K. “The total number of customers that applied and received a solar rebate in accordance with section (4) of this rule;”

EMM reported it paid 86 solar rebates during calendar year 2024.

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

EMM reported no customers were denied a rebate during calendar year 2024.

¹² NAR Requirements for Qualified Reporting Entities.

¹³ Response to Staff Data Request No. 0004 in EO-2014-0289.

- M. “The amount 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;”**

EMM reported that it paid \$166,855 in solar rebates for calendar year 2024. Staff reserves the right to comment on the prudence of solar rebate expenditures when rate recovery is requested.

- N. “An affidavit documenting the electric utility’s compliance with the RES compliance plan as described in this section during the calendar year;”**

EMM filed a signed Affidavit with the Report.

- O. “If compliance was not achieved, an explanation why the electric utility failed to meet the RES; and”**

EMM provided a statement that it believes it has achieved compliance with the RES. Additionally, EMM retired the appropriate number of RECs to meet the RES solar and non-solar requirements.

- P. “A calculation of its actual calendar year retail rate impact.”**

EMM included its actual calendar year retail rate impact, 0.052%, on Page 10 of the Report.

CONCLUSION

EMM has achieved compliance with the RES requirements for the 2024 compliance year.

OF THE STATE OF MISSOURI

AFFIDAVIT OF AMANDA ARANDIA

Amanda Arandia
AMANDA ARANDIA

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2029
Commission Number: 12412070

Suzell Hankin
Notary Public