

**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)	<u>File No. EO-2025-0282</u>
2024 Renewable Energy Standard)	
Compliance Report)	

In the Matter of Evergy Missouri West, Inc.)	
d/b/a Evergy Missouri West's Submission of)	<u>File No. EO-2025-0283</u>
Its 2024 Renewable Evergy Standard)	
Compliance Report)	

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

In the Matter of Evergy Missouri West, Inc.)	
d/b/a Evergy Missouri West's Submission of)	<u>File No. EO-2025-0285</u>
Its 2025 Renewable Evergy Standard)	
Compliance Plan)	

STAFF'S REPORT AND RECOMMENDATION

Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("EMM") and Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("EMW") (collectively, "Evergy") have filed their 2024 Renewable Energy Standard (RES) Compliance Reports and 2025 Annual RES Standard Compliance Plans, as required by Commission Rule 20 CSR 4240-20.100(8). Additionally, in Files EO-2025-0282 and EO-2025-0283, 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 (REC) to various renewable energy resource vendors. On April 17, 2025, the Commission ordered Staff to review the RES compliance reports and plans and file a report on each no later than May 30, 2025.

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 requirements for the RES Compliance Plan. On April 15, 2025, Evergy filed its 2024 Annual RES Compliance Reports in File No. EO-2025-0282 for EMM and EO-2025-0283 for EMW to comply with the applicable provisions of the rule. Also, on April 15, 2025, Evergy filed its 2025 RES Compliance Plans in File No. EO-2025-0284 for EMM and EO-2025-0285 for EMW to comply with additional provisions of the same rule.

The Official Case File Memoranda filed with this pleading, and incorporated here by reference as Attachment A in each of the four (4) file numbers named above, provide Staff's evaluation, findings and recommendations for each of the rule subparts within 20 CSR 4240-20.100(8)(A) and (B).

EO-2025-0282

Staff reviewed EMM's 2024 Annual RES Compliance Report filed on April 15, 2025. Based on its review of the Report, Staff has not identified any deficiencies. Staff utilized the North American Renewables Registry¹ to independently verify the retirement of the RECs and Solar-RECs by EMM for its 2024 RES compliance. EMM has achieved compliance with the RES requirements of Rule 20 CSR 4240-20.100(8)(A)1 for the 2024 compliance year.

Regarding EMM'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 "[a]ll meter readings used for calculation of the payments referenced in part (IV) of this paragraph." Part IV requires

¹ <http://narecs.com/>

information concerning “[t]he dates and amounts of all payments from the electric utility to the owner of the facility.” Rule 20 CSR 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 EMM 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 Spearville 3, Cimarron, Slate Creek, Osborn, Waverly, Prairie Queen, Ponderosa, Rock Creek, and Pratt wind farms.

EO-2025-0283

Staff reviewed EMW's 2024 Annual RES Compliance Report filed on April 15, 2025. Staff utilized the North American Renewables Registry² to independently verify the retirement of the RECs and solar-RECs by EMW for its 2024 RES compliance. EMW has achieved compliance with the RES requirements of Rule 20 CSR 4240-20.100(8)(A)1 for the 2024 compliance year.

Similar to EMM, Staff recommends the Commission grant EMW 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.

² <http://narecs.com/>

EO-2025-0284

With respect to File EO-2025-0284, Staff concludes that EMM's 2025 Annual RES Compliance Plan has met the minimum requirements of 20 CSR 4240-20.100(8)(B).

EO-2025-0285

With respect to File EO-2025-0285, Staff concludes that EMW's 2025 Annual RES Compliance Plan has met the minimum requirements of 20 CSR 4240-20.100(8)(B).

Staff has not made a ratemaking determination as to whether the EMM and EMW plans are the least expensive or prudent method for complying with the RES. Staff recommends that the Commission be explicit in any Order it may issue in these cases that it is not making a ratemaking determination.

WHEREFORE, Staff prays that the Commission accept these reports and recommendations as complying with the Commission's Orders and grant the limited variances requested by Evergy.

Respectively Submitted,

/s/ Tracy D. Johnson

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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, to the parties of record as listed in the Service List maintained for this case by the Commission's Data Center, on this 30th day of May, 2025.

/s/ Tracy D. Johnson