

**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 2022 ) File No. EO-2023-\_\_\_\_\_  
Renewable Energy Standard Compliance Report )

In the Matter of Evergy Missouri West, Inc. d/b/a )  
Evergy Missouri West’s Submission of Its 2022 ) File No. EO-2023-\_\_\_\_\_  
Renewable Energy Standard Compliance Report )

**RENEWABLE ENERGY STANDARD COMPLIANCE REPORT  
AND REQUEST FOR VARIANCE**

**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 provides its Renewable Energy Standard (“RES”) Compliance Report. The Company also requests a limited variance for a portion of the Missouri Public Service Commission’s (“Commission”) RES Rules, found at 20 CSR 4240-20.100(8)(A)1.I.(V), and states as follows:

1. As part of its efforts to comply with Missouri’s RES law, the Company is purchasing Renewable Energy Credits (“RECs”) from various vendors.
2. For RECs purchased from a renewable energy resource not owned by the Company, 20 CSR 4240-20.100(8)(A)1.I.(V) requires all meter readings used for calculation of the payments from the electric utility to the owner of the facility.
3. The Company requests that the Commission grant it a limited variance of this requirement because the meter reading information is not provided by the vendors that the Company purchases RECs from. As it did last year, the Company is providing the invoice information requested by Staff.
4. Good cause exists for the granting of this limited variance, as the meter readings are not available.

5. The Company applied for a similar limited variance in 2018 (File Nos. EO-2019-0315 and EO-2019-0316)<sup>1</sup> which was granted by the Commission in its separate *Order[s] Regarding 2018 RES Compliance Report and Granting Waiver* issued on September 4, 2019.

6. The Company also applied for a similar limited variance in 2020 (File Nos. EO-2020-0329 and EO-2020-0330) which was supported by Staff (“Staff”) for the Commission in its *Supplemental Report EMM and EMV Request for a Limited Waiver from Commission Rule 20 CSR 4240-20.100(8)(A)1.I.(V)*, filed in both of these dockets on October 8, 2020 and was granted by the Commission in its *Order Regarding 2019 RES Compliance Reports and Granting Waiver 2020 RES Compliance Plans and Order Granting Waiver* issued on May 25, 2022.

7. The Company also applied for a similar limited variance in 2021 (File Nos. EO-2021-0345 and EO-2021-0346) which was supported by Staff (“Staff”) for the Commission in its *Staff Report on 2020 Annual Renewable Energy Standard Compliance Report*, filed in each of these respective dockets on June 22, 2021 and was granted by the Commission in its *Order Regarding 2020 RES Compliance Reports and Granting Waiver 2021 RES Compliance Plans and Order Granting Waiver* issued on May 25, 2022.

8. The Company also applied for a similar limited variance in 2022 (File Nos. EO-2022-0285 and EO-2022-0286) which was supported by Staff (“Staff”) for the Commission in its *Staff Report on 2021 Annual Renewable Energy Standard Compliance Report*, filed in each of these respective dockets on August 5, 2022 and was granted by the Commission in its *Notice*

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<sup>1</sup> Both of these prior dockets related to Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”), respectively, however, effective October 7, 2019, Evergy Metro Inc. d/b/a Evergy Missouri Metro adopted the service territory and tariffs of KCP&L and Evergy Missouri West, Inc. d/b/a Evergy Missouri West adopted the service territory and tariffs of GMO.

*Regarding 2021 RES Compliance Report and 2022 RES Compliance Plan, and Order Granting Variance issued on September 22, 2022.*

**WHEREFORE**, the Company requests the Commission grant it a limited waiver of the meter readings requirement 20 CSR 4240-20.100(8)(A)1.I.(V).

Respectfully submitted,

*/s/ Roger W. Steiner*

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**Attorney for Evergy Missouri Metro and Evergy  
Missouri West**

**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 17<sup>th</sup> day of April 2023, to all parties of record.

*/s/ Roger W. Steiner*

Roger W. Steiner

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**AFFIDAVIT OF JAMES FERNEAU**

**STATE OF MISSOURI )**  
**) ss**  
**COUNTY OF JACKSON )**


James Ferneau, being first duly sworn on her oath, states:

1. My name is James Ferneau. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. (“Evergy”) as Manager, Regulatory Affairs.

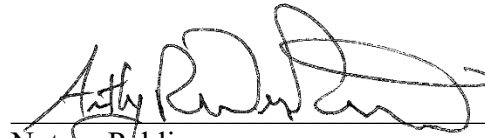
2. Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”) is in compliance with Rule (8)(A)1 N as outlined in Section 2.14 of Evergy Missouri Metro’s 2022 Annual Renewable Energy Standard (“RES”) Compliance Report (“2022 Compliance Report”). Evergy Missouri Metro is in compliance with the RES Compliance Plan and no adjustment will be required.

3. Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) is in compliance with Rule (8)(A)1 N as outlined in Section 2.14 of Evergy Missouri West’s 2022 Compliance Report. Evergy Missouri West is in compliance with the RES Compliance Plan and no adjustment will be required.

I have knowledge of the matters set forth therein. I hereby swear and affirm that this information is true and accurate to the best of my knowledge, information and belief.

  
James Ferneau

Subscribed and sworn before me this 17<sup>th</sup> day of April 2023.

  
Notary Public

My commission expires:

4/26/2025

