

**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 2026 ) **Case No. EO-2026-0274**  
Renewable Energy Standard Compliance Plan )

In the Matter of Evergy Missouri West, Inc. )  
d/b/a Evergy Missouri West’s Submission of ) **Case No. EO-2026-0275**  
its 2026 Renewable Energy Standard )  
Compliance Plan )

**STAFF REPORT**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its Staff Report, states as follows:

1. On April 15, 2026, Evergy Metro, Inc., d/b/a Evergy Missouri Metro (“EMM”) and Evergy Missouri West, Inc., d/b/a Evergy Missouri West (“EMW”) (collectively, “Evergy”) filed their Renewable Energy Standard (“RES”) Compliance Plans for 2026 (“Plans”) as required by Commission Rule 20 CSR 4240-20.100(8).

2. Commission Rule 20 CSR 4240-20.100(8)(D) requires Staff to review Evergy’s RES Compliance Plans and file a Staff report within 45 days of their filing. Following Evergy’s filing of its Plans, the Commission ordered Staff to file its report no later than May 29, 2026.

**I. EMM Plan**

3. Commission Rule 20 CSR 4240-20.100(8)(B)1.A. through G. establishes fundamental standards for RES Compliance Plans.

4. As discussed in greater detail in *Staff’s EMM Memorandum*, attached and incorporated herein as Attachment A, Staff did not identify any deficiencies with EMM’s Plan.

5. Staff has not made a ratemaking determination as to whether the Plan is 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 this case that it is not making a ratemaking determination.

## II. EMW Report

6. Commission Rule 20 CSR 4240-20.100(8)(B)1.A. through G. establishes fundamental standards for RES Compliance Plans.

7. As discussed in greater detail in *Staff's EMW Memorandum*, attached and incorporated herein as Attachment B, Staff did not identify any deficiencies with EMW's Plan.

8. Staff has not made a ratemaking determination as to whether the Plan is 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 this case that it is not making a ratemaking determination.

**WHEREFORE**, Staff tenders its Staff Report on Evergy's RES Compliance Plans for 2026.

Respectfully submitted,

**/s/ Travis J. Pringle**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 29th day of May, 2026.

**/s/ Travis J. Pringle**

## **MEMORANDUM**

**TO:** Missouri Public Service Commission Case File  
Case No. EO-2026-0274, Evergy Metro, Inc., d/b/a Evergy Missouri Metro's  
Submission of its 2026 Renewable Energy Standard Compliance Plan

**FROM:** Malachi Bowman, Associate Engineer, Engineering Analysis

/s/ Malachi Bowman / 05/29/2026  
Engineering Analysis / Date

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

**DATE:** May 29, 2026

### **SUMMARY**

Staff has reviewed Evergy Metro, Inc., d/b/a Evergy Missouri Metro's ("EMM" or "Company") *2026 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 2026 through 2028, in accordance with Commission Rule 20 CSR 4240-20.100(8), Electric Utility Renewable Energy Standard ("RES") 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 20 CSR 4240-20.100(8). The results

\*\* Denotes Confidential Information \*\*

**Attachment A**

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 2026 to 2028, 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 RECs 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 RECs for each MWh produced.

To meet its RES solar renewable energy credit (“S-REC”) requirements, the Company intends to use S-RECs sourced primarily from its customer-generators. These customer-generators receive a rebate for building a qualified solar facility, and the Company receives the rights to the RECs for a ten-year period. EMM also co-owns the Hawthorn Solar Project with Evergy Missouri West and is the Company’s only utility scale solar generator at 10 MW, with 6 MW allocated to customer programs<sup>1</sup> and 4 MW<sup>2</sup> allocated towards RES compliance as needed. Together, the S-RECs available from these resources exceeds the solar RES requirement. Because the Hawthorn Solar Project and customer generators are located in Missouri, the Company receives 1.25 RECs for each MWh produced.

Together, these resources generate more RECs than the Company requires for compliance. In 2026, the Company’s existing resources could supply an

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

<sup>2</sup> Both Evergy Missouri West and Evergy Missouri Metro get 2 MW of this total.

expected \*\* [REDACTED] \*\* of RECs, but only 1,454,718 MWh of RECs are expected to be needed for compliance. Similar surpluses are expected in 2027 and 2028, though the annual surplus does decrease over the planning period due to anticipated additional large load.

**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
<b>Cimarron II</b>	Wind	142,677	6/1/2012	20 years
<b>Spearville 3</b>	Wind	93,063	10/1/2012	20 years
<b>Waverly</b>	Wind	421,547	1/4/2016	20 years
<b>Slate Creek</b>	Wind	344,134	12/30/2015	20 years
<b>Osborn</b>	Wind	232,465	12/15/2016	20 years
<b>Rock Creek</b>	Wind	371,884	11/8/2017	20 years
<b>Pratt</b>	Wind	267,128	12/13/2018	20 years
<b>Prairie Queen</b>	Wind	150,471	8/10/2019	20 years

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

The Company provided annual projected retail electric sales through 2028 in its Plan, and additional years in its Attachment A. These projections are consistent with its most recent integrated resource plan (“IRP”) update<sup>3</sup> and past RES Plan filings.

**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 to meet its RES compliance goals through existing resources, there are no differences between its 2026-2028 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 and the non-solar portion of the RES for 2026 through 2028. 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

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<sup>3</sup> EO-2025-0250. Item 1, 2025 Evergy Metro Annual Update, Page 82, March 13, 2025.

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 Submission of its ) Case No. EO-2026-0274  
2026 Renewable Energy Standard )  
Compliance Plan )

**AFFIDAVIT OF MALACHI BOWMAN**

STATE OF MISSOURI )  
) ss.  
COUNTY OF COLE )

**COMES NOW MALACHI BOWMAN** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Report on Evergy Missouri Metro's Submission of its 2026 Renewable Energy Standard Compliance Plan* in memorandum form; and that the same is true and correct according to his best knowledge and belief.


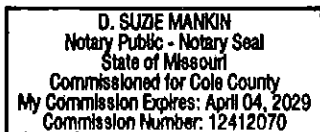
Further the Affiant sayeth not.



**MALACHI BOWMAN**

**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 27<sup>th</sup> day of May 2026.

  
Notary Public

## **MEMORANDUM**

**TO:** Missouri Public Service Commission Case File  
Case No. EO-2026-0275, Evergy Missouri West, Inc., d/b/a Evergy Missouri West's Submission of its 2026 Renewable Energy Standard Compliance Plan

**FROM:** Malachi Bowman, Associate Engineer, Engineering Analysis

/s/ Malachi Bowman / 05/29/2026  
Engineering Analysis / Date

**SUBJECT:** Staff Report and Conclusion on Evergy Missouri West's 2026 Annual RES Compliance Plan

**DATE:** May 29, 2026

### **SUMMARY**

Staff has reviewed Evergy Missouri West, Inc., d/b/a Evergy Missouri West's ("EMW" or "Company") *2026 RES Compliance Plan* ("Plan"). Based on its review, Staff has not identified any deficiencies the Company's filing.

### **OVERVIEW**

On April 15, 2026, the Company filed its Plan for calendar years 2026 through 2028, in accordance with Commission Rule 20 CSR 4240-20.100(8), Electric Utility Renewable Energy Standard ("RES") 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 20 CSR 4240-20.100(8). The results

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**Attachment B**

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 2026 to 2028, the Company intends to use its existing purchased power agreements (“PPA”) for wind generation. EMW expects 2.6 million MWh of non-solar production from these PPAs. This production exceeds the anticipated non-solar requirement and the excess RECs 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 RECs for each MWh produced.

To meet its RES solar renewable energy credit (“S-REC”) requirements, the Company intends to use S-RECs sourced primarily from its customer-generators. These customer-generators receive a rebate for building a qualified solar facility, and the Company receives the rights to the RECs for a ten-year period. EMW also co-owns the Hawthorn Solar Project with Evergy Missouri Metro and is the Company’s only utility scale solar generator at 10 MW, with 6 MW allocated to customer programs<sup>1</sup> and 4 MW<sup>2</sup> allocated towards RES compliance as needed. Together, the S-RECs available from these resources exceeds the solar RES requirement. Because the Hawthorn Solar Project and customer generators are located in Missouri, the Company receives 1.25 RECs for each MWh produced.

Together, these resources generate more RECs than the Company requires for compliance. In 2026, the Company’s existing resources could supply an

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

<sup>2</sup> Both Evergy Missouri West and Evergy Missouri Metro get 2 MW of this total.

expected \*\* [REDACTED] \*\* of RECs, but only 1,389,222 MWh of RECs are expected to be needed for compliance. Similar surpluses are expected in 2027 and 2028, though the annual surplus does decrease over the planning period due to anticipated additional large load.

**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
<b>Gray County<sup>3</sup></b>	Wind	356,176	3/13/2001	15 years
<b>Ensign</b>	Wind	435,114	11/22/2012	20 years
<b>Osborn</b>	Wind	273,376	12/15/2016	20 years
<b>Rock Creek</b>	Wind	437,331	11/8/2017	20 years
<b>Prairie Queen</b>	Wind	324,412	8/10/2019	20 years
<b>Pratt</b>	Wind	575,922	12/13/2018	30 years

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

The Company provided annual projected retail electric sales through 2028 in its Plan, and additional years in its Attachment A but these values were not correct. EMW provided updated values in a data request response and stated that \*\* [REDACTED]

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<sup>3</sup> The PPA for Gray County was extended in 11/2016 for an additional 15 years.

[REDACTED]

[REDACTED].\*\*

- 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 to meet its RES compliance goals through existing resources, there are no differences between its 2026-2028 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 and the non-solar portion of the RES for 2026 through 2028. 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 EMW’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 EMW 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 Missouri West, )  
Inc. d/b/a Evergy Missouri West's ) Case No. EO-2026-0275  
Submission of Its 2026 Renewable )  
Energy Standard Compliance Plan )

**AFFIDAVIT OF MALACHI BOWMAN**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

**COMES NOW MALACHI BOWMAN** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Report on Evergy Missouri West's Submission of Its 2026 Renewable Energy Standard Compliance Plan* in memorandum form; and that the same is true and correct according to his best knowledge and belief.

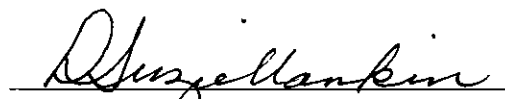
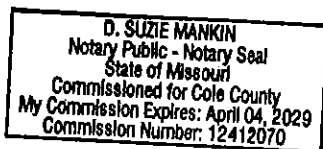
Further the Affiant sayeth not.



**MALACHI BOWMAN**

**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 27<sup>th</sup> day of May 2026.



Notary Public