

**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 2025) **File No. EO-2026-0272**
Renewable Energy Standard Compliance)
Report)

In the Matter of Evergy Missouri West, Inc.)
d/b/a Evergy Missouri West’s Submission of its) **File No. EO-2026-0273**
2025 Renewable Energy Standard Compliance)
Report)

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 2025 Renewable Energy Standard (“RES”) Compliance Reports (“Reports”) 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 Reports and file a Staff report within 45 days of their filing. Following Evergy’s filing of its Reports, the Commission ordered Staff to file its report no later than May 29, 2026.

I. EMM Report

3. Commission Rule 20 CSR 4240-20.100(8)(A)1.A. through P. provide the minimum filing requirements for the RES Compliance Report.

4. As discussed in greater detail in *Staff's EMM Memorandum*, attached and incorporated herein as Attachment A, Staff has not identified any deficiencies in the Report. EMM has retired sufficient renewable energy credits ("RECs") to satisfy the 2025 RES requirements.

II. EMW Report

5. Commission Rule 20 CSR 4240-20.100(8)(A)1.A. through P. provide the minimum filing requirements for the RES Compliance Report.

6. 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 Report. EMW has retired sufficient RECs to satisfy the 2025 RES requirements.

WHEREFORE, Staff tenders its Staff Report on Evergy's 2025 Compliance Report.

Respectfully submitted,

/s/ Travis J. Pringle

Travis J. Pringle

Missouri Bar No. 71128

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Missouri Public Service Commission

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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 Official Case File
Case No. EO-2026-0272, Evergy Missouri Metro’s
Submission of Its 2025 Renewable Energy Standard Compliance Report

FROM: Malachi Bowman May 29, 2026
Engineering Analysis / Date

SUBJECT: Staff Report and Conclusion on Evergy Missouri Metro’s 2025 Renewable
Energy Standard Compliance Report

DATE: May 29, 2026

SUMMARY

Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“EMM”) filed its *2025 Annual Renewable Energy Standard Compliance Report* (“Report”) on April 15, 2026. 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 Commission 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 II, Slate Creek, Osborn, Waverly, Prairie Queen, 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 2025 Renewable Energy Standard (RES) compliance.¹ EMM has achieved compliance with the RES requirements for the 2025 compliance year.

¹ <http://narecs.com/>.

OVERVIEW

On April 15, 2026, EMM filed its Report for calendar year 2025. The Report was filed in accordance with 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 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 of its review within forty-five (45) days of the filing. On April 15, 2025, the Commission ordered Staff to file its report no later than May 29, 2026.

DISCUSSION

Staff has reviewed EMM's Report in accordance with the established requirements to verify that EMM has provided the information required by 20 CSR 4240-20.100(8). 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 2025 expressed as total megawatt-hours (MWh) sold to EMM consumers as 8,396,957 MWh which matches the value in EMM's Federal Energy Regulatory Commission ("FERC") Form 1 filing² as well.

² BMAR-2026-1762, page 401a

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 2025 expressed as annual operating revenues (dollars) from EMM consumers of \$918,342,688. This amount is consistent with the amount listed on the Missouri Jurisdictional 2025 FERC Form 1³ filed with the Commission on May 15, 2025.

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 2025 total retail electric sales by renewable resource based on its energy allocation presumption.

EMM utilized four (4) company-owned renewable energy generating facilities during 2025; Spearville 1, Spearville 2, Hawthorn Solar and Solar Aggregate 1.⁴ EMM also has eight (8) operational purchase power agreements (“PPA”), with Spearville 3, LLC (“Spearville 3”), Cimarron Windpower II (“Cimarron II”), 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.

³ BMAR-2026-1762., page 2

⁴ Solar Aggregate 1 represents EMM’s small owned solar generation located in Missouri, which qualifies for the 1.25 credit multiplier per § 393.1030.1, RSMo. and 20 CSR 4240-20.100(3)(G).

Reported MWh by Facility

	Evergy 2025 (MWh) reported	NAR Project Account Holder	Energy Source
Spearville 1	49,387	Kansas City Power & Light	Wind
Spearville 2	23,148	Kansas City Power & Light	Wind
Solar Aggregate 1	36	Kansas City Power & Light	Solar
Spearville 3	96,565	Kansas City Power & Light	Wind
Cimarron II	137,177	Duke Energy Generations Services, Inc	Wind
Slate Creek Wind	252,147	Kansas City Power & Light	Wind
Waverly	400,168	Waverly Wind Farm, LLC	Wind
Osborn	229,669	Kansas City Power & Light	Wind
Prairie Queen	111,789	Prairie Queen Wind Farm, LLC	Wind
Pratt	229,489	NextEra Energy Resources	Wind
Rock Creek	354,393	Rock Creek Wind Project, LLC	Wind
Solar Rebates	32,530	Kansas City Power & Light	Solar
Hawthorn Solar	6,317	Kansas City Power & Light	Solar
TOTAL	1,922,815		

Staff was able to verify these RECs in NAR.

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 2025 and the value of energy created for each company-owned facility.

RECs Produced in 2025

Facility	Number of RECs	Compliance Equivalency ⁵	Value of Energy	Value of RECs
Spearville 1	49,387	n/a	\$2,420,510	0
Spearville 2	23,148	n/a	\$1,156,064	0
Solar Aggregate 1	36	45	\$836	0
Hawthorn Solar ⁶	6,317	7,896	\$283,534	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. If EMM were to sell these RECs, there would be a value associated with them based on what the buyer purchases them for.

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 D 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 D and confirmed its accuracy

⁵ 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 and 20 CSR 4240-20.100(3)(G).

⁶ Value reflects the EMM portion of Hawthorn Solar including the solar subscriber portion.

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

RECs Acquired, Sold, Transferred or Retired in 2025

	Number of RECs (Compliance Equivalency)	Number of S-RECs (Compliance Equivalency)
Acquired	1,811,367 (1,957,382)	32,540 ⁷ (40,662)
Retired ⁸	1,077,727 (1,234,354)	20,154 (25,192)
Sold	9,544 (9,544)	
Transferred	0	0

EMM reported the sale of 9,544 RECs in 2025.

EMM retired 2022 vintage wind RECs from Spearville 1, Spearville 2, Spearville 3, Cimarron 2, Slate Creek, Waverly, Osborn, Rock Creek, and Solar Rebates. Staff verified that EMM retired 1,234,354 (includes in-state factor for RECs generated in Missouri) to meet the non-solar requirement of 1,234,353.⁹ EMM also retired 25,192 S-RECs (includes in-state factor for customer-generated S-RECs) to meet the solar requirement of 25,191.¹⁰

⁸ In appendix D, retirements for the 2025 calendar year are listed under the vintage year 2022 as “MO Compliance for 2025”.

⁹ 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.

¹⁰ 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 and utilized for compliance purposes. In accordance with statute and regulation, these RECs were produced by a qualified facility and were banked and utilized appropriately.¹¹

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 2023, 2024, and 2025 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;”

¹¹ 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).

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

“(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 1, Spearville 2, 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 2025 RES Compliance as listed on the MDNR list of Renewable Energy Standard Certified facilities¹²:

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

¹² [Renewable Energy Standard \(RES\) Certification | Missouri Department of Natural Resources \(mo.gov\)](https://www.mo.gov/energy/renewable-energy-standard-certification).

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

“(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]

[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.¹³ ** [REDACTED]

[REDACTED]¹⁴ **

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 Commission 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 2, Slate Creek, Osborn, Rock Creek, Waverly, Prairie Queen, and Pratt.

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

"(l) Location (zip code);"

¹³ NAR Requirements for Qualified Reporting Entities.

¹⁴ Response to Staff Data Request No. 0004 in EO-2014-0289.

“(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;”

EMM states it had no new net metered accounts added in 2025. To clarify EMW’s statement, EMW reported new net metered customers in BANM-2025-1294 and BANM-2026-1669, however, these customers would not provide RECs. EMW reported the information required for existing in Appendix B and D of the Report. EMM stated that S-RECs acquired during the calendar year were from qualified customer generator’s operational solar electric systems as a condition of receiving solar rebate.

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 no solar rebates during calendar year 2025.

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 2025.

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 \$0 in solar rebates for calendar year 2025.

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, 0.008%, on Page 10 of the Report.

CONCLUSION

EMM has achieved compliance with the RES requirements for the 2025 compliance year.

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) Case No. EO-2026-0272
Its 2025 Renewable Energy Standard)
Compliance Report)

AFFIDAVIT OF MALACHI BOWMAN

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

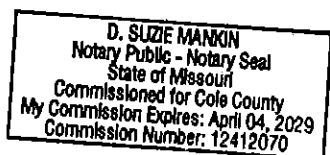
COMES NOW MALACHI BOWMAN and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Report on Evergy Missouri Metro's Submission of Its 2025 Renewable Energy Standard Compliance Report* in memorandum form; and that the same is true and correct according to his best knowledge and belief.

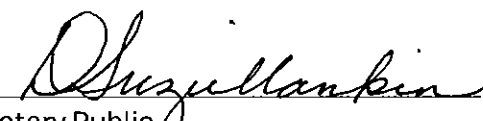
Further the Affiant sayeth not.


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 27th day of May 2026.




Notary Public

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. EO-2026-0273, Evergy Missouri West's
Submission of Its 2025 Renewable Energy Standard Compliance Report

FROM: Malachi Bowman / May 29, 2026
Engineering Analysis / Date

SUBJECT: Staff Report and Conclusion on Evergy Missouri West's 2025 Renewable
Energy Standard Compliance Report

DATE: May 29, 2026

SUMMARY

Evergy Missouri West ("EMW") filed its *2025 Annual Renewable Energy Standard Compliance Report* ("Report") on April 15, 2026. Based on its review of the Report, Staff has not identified any deficiencies.

Regarding EMW's request for waiver, Staff recommends the Commission grant EMW 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 Gray County, Ensign, Osborn, Prairie Queen, Pratt, Rock Creek, and Cimarron Bend III 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 EMW for its 2025 Renewable Energy Standard (RES) compliance.¹ EMW has achieved compliance with the RES requirements for the 2025 compliance year.

OVERVIEW

On April 15, 2025, EMW filed its Report for calendar year 2025. 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 EMW's Report and file a report within forty-five (45) days of the filing. On April 15, 2026, the Commission ordered Staff to file its report no later than May 29, 2026.

DISCUSSION

Staff has reviewed EMW's Report in accordance with the established requirements to verify that EMW 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;"

EMW provided the total retail electric sales for 2025 expressed as total megawatt-hours (MWh) sold to EMW consumers as 8,766,142 MWh. This is consistent with EMW's FERC Form 1 filed on May 15, 2026, in File No. BMAR-2026-1763.

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

EMW provided the total retail electric sales for 2025 expressed as annual operating revenues (dollars) from EMW consumers of \$884,475,105. This amount is consistent with the amount listed on the Missouri Jurisdictional 2026 FERC Form 1 filed with the Commission on May 15, 2026.

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

EMW provided the 2025 total retail electric sales by renewable resource based on its energy allocation presumption.

EMW utilized three company-owned renewable energy generating facilities during 2025: St. Joseph Landfill Gas, Hawthorn Solar and Greenwood Solar. EMW also has seven operational purchase power agreements (“PPA”), with Gray County Wind Energy, LLC (“Gray County”), Ensign Wind, LLC (“Ensign”), Osborn Wind Energy (“Osborn”), Prairie Queen Windfarm, LLC (“Prairie Queen”), Pratt Wind, LLC (“Pratt”), Rock Creek Wind (“Rock Creek”), and Cimarron Bend Windpower III (“Cimarron Bend”). Additionally, EMW provided the total estimated generation (MWh) supplied by its newly interconnected customer-generators.

Reported MWh by Facility

	2025 (MWh) reported	NAR Project Account Holder
Gray County Wind	237,464	KCP& L Greater Missouri Operations
Ensign Wind	400,038	KCP& L Greater Missouri Operations
Osborn Wind	268,423	Kansas City Power & Light
Prairie Queen	240,153	Prairie Queen Wind Farm, LLC
Pratt	492,638	NextEra Energy Resources
Rock Creek Wind	414,377	Rock Creek Wind Projects, LLC
Cimarron Bend III	381,522	Cimarron Bend Wind Project III, LLC
St. Joseph Landfill Gas	7,011	KCP& L Greater Missouri Operations
Hawthorn	5,489	KCP& L Greater Missouri Operations
Greenwood Solar	3,754	KCP& L Greater Missouri Operations
Customer Generators	32,816	KCP& L Greater Missouri Operations
TOTAL	2,483,685	

Staff was able to verify these RECs in NAR.

- 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;”**

EMW reported the number of RECs and S-RECs produced in 2025 and the value of energy created for each company-owned facility.

RECs Produced in 2025

Facility	Number of RECs	Compliance Equivalency ²	Value of Energy	Value of RECs
St. Joseph Landfill Gas	7,011	8,763	\$187,880	0
Hawthorn Solar	5,489	N/A	\$246,369	0
Greenwood Solar	3,754	4,692	\$154,665	0

EMW reports no value to its owned resources. However, Staff believes there is a value to the RECs and S-RECs created by EMW’s owned generation though that value is not transparent. If EMW were to sell these RECs, there would be a value associated with them based on what the buyer purchases them for.

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

EMW provided the information regarding the number of RECs acquired, sold, transferred and retired during the calendar year in Appendix D of its Report for each individual facility. Staff reviewed the information provided in Appendix D and confirmed its accuracy in NAR. The following table represents the number of

² 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).

RECs acquired, sold, transferred, and retired during the calendar year. While EMW did not specifically provide the information as listed in this table, Staff was able to create this table using the information provided in Appendix D and simple addition.

RECs Acquired, Sold, Transferred or Retired in 2025

	Number of RECs (Compliance Equivalency)	Number of S-RECs (Compliance Equivalency)
Acquired	2,434,615 (2,605,315)	32,816 (41,020)
Retired ³	1,096,463 (1,288,623)	21,040 (26,300)
Sold	87,375 (87,375)	0
Transferred	0	0

EMW reported the sale of 87,375⁴ RECs in 2025.

EMW retired 2022 vintage wind RECs from Ensign, Osborn, Prairie Queen, Pratt, Rock Creek, St. Joseph Landfill, Greenwood Solar, and Customer Generators. Staff verified that EMW retired 1,288,623 RECs (includes in-state factor for RECs generated in Missouri) to meet the non-solar requirement of 1,288,623.⁵ EMW also retired 26,300 S-RECs (includes in-state factor for customer-generated S-RECs) to meet the solar requirement of 26,299.⁶

³ In appendix E, retirements for the 2025 compliance year are listed under the vintage year 2022 as “MO Compliance for 2025”.

⁴ Appendix D, Total MO West Assets

⁵ 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.

⁶ 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.⁷

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

EMW 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;”

EMW 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 2023, 2024, and 2025 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;”

⁷ 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).

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

“(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;”

EMW notes that the Generator Owners for Gray County, Ensign, Greenwood Solar, St. Joseph LFG, and Osborn have designated EMW 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, EMW provided the Responsible Party designation forms in response to Staff Data Request No. 0002. Rock Creek, Prairie Queen, and Pratt are registered in NAR to their respective owners.⁸

Staff also verified that Gray County, Ensign, Osborn, Pratt, Rock Creek, and Cimarron Bend III are listed on the Missouri Department of Natural Resources (MDNR) list of Renewable Energy Standard Certified facilities.⁹ Please see the table below of these facilities as they are listed on the MDNR list of Renewable Energy Standard Certified facilities.

⁸ <https://apx.com/registries/nar-1/public-records-and-reports/>

⁹ [Renewable Energy Standard \(RES\) Certification | Missouri Department of Natural Resources \(mo.gov\)](#).

Facility Listings in MDNR list of Renewable Energy Standard Certified Facilities

Facility Name	Certification Date	Location	Applicant	Total Nameplate Capacity (MW)
Gray County Wind Energy, LLC	11/23/2011	Gray County, KS	KCP&L	112.2
Ensign Wind, LLC	12/6/2012	Gray County, KS	GMO	98.9
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
Cimarron Bend Wind Project III, LLC ¹⁰	11/11/2020	Clark County, KS	Evergy Missouri Metro and Evergy Missouri West (formerly KCP&L and GMO)	198.84

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

The renewable energy technology was included in Table 3 of the Report.

“(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. EMW 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 EMW purchases RECs.

¹⁰ 75 MW Designated for the Renewable Energy Rider Tariff per PSC MO No. 1, 1st revised sheet 139.7.

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 Gray County, Ensign, Prairie Queen, Pratt, Osborn, Cimarron, and Rock Creek 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]

[REDACTED]

[REDACTED] **

Since EMW 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.¹¹ ** [REDACTED]

[REDACTED] **¹²

Based on its review of the information provided by EMW and other sources, Staff recommends the Commission grant EMW a limited waiver from the requirements of Rule 20 CSR 4240-20.100(8)(A)1.I.(V) to substitute invoices,

¹¹ NAR Requirements for Qualified Reporting Entities.

¹² Response to Staff Data Request No. 0004 in EO-2014-0289.

which were provided in appendix C of the Report, 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.

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;”

EMW states it had no new net metered accounts added in 2025. To clarify EMW’s statement, EMW reported new net metered customers in BANM-2025-1294 and BANM-2026-1669, however, these customers would not provide RECs. EMW reported the information required for existing in Appendix B and D of the Report.

EMW stated that S-RECs acquired during the calendar year were from qualified customer generator’s operational solar electric systems as a condition of receiving solar rebate.

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

EMW reported it paid 0 solar rebates during calendar year 2025.

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

EMW reported no customers were denied a rebate during calendar year 2025.

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;”

EMW reported that it paid \$0 in solar rebates for calendar year 2025. 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;”

EMW 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”

EMW provided a statement that it believes it has achieved compliance with the RES. Additionally, EMW 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.”

EMW included its actual calendar year retail rate impact, 0.145%, on Page 9 of the Report.

CONCLUSION

EMW has achieved compliance with the RES requirements for the 2025 compliance year.

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-2026-0273
Submission of Its 2025 Renewable)
Energy Standard Compliance Report)

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 2025 Renewable Energy Standard Compliance Report* in memorandum form; and that the same is true and correct according to his best knowledge and belief.

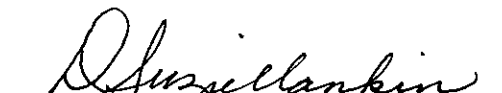
Further the Affiant sayeth not.



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 27th day of May 2026.


Notary Public