

**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 2019 )	File No. EO-2020-0329
Renewable Energy Standard Compliance Report )	
In the Matter of Evergy Missouri West, Inc. d/b/a )	
Evergy Missouri West’s Submission of Its 2019 )	File No. EO-2020-0330
Renewable Energy Standard Compliance Report )	
In the Matter of Evergy Metro, Inc. d/b/a )	
Evergy Missouri Metro’s Submission of Its )	File No. EO-2020-0331
2020 Renewable Energy Standard Compliance )	
Plan )	
In the Matter of Evergy Missouri West, Inc. d/b/a )	
Evergy Missouri West’s 2020 Renewable Energy )	File No. EO-2020-0332
Standard Compliance Plan )	

**EVERGY MISSOURI METRO’S AND  
EVERGY MISSOURI WEST’S RESPONSE TO ORDER**

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 “Evergy” or the “Company”) and, pursuant to the Missouri Public Service Commission’s July 2, 2020 *Order[s] Directing Response[s]* (“Orders”) in the each of the respective above-captioned dockets, state as follows:

**BACKGROUND**

1. On June 12, 2020, Staff for the Commission (“Staff”) and the Office of the Public Counsel (“OPC”) submitted comments regarding Evergy’s 2019 Renewable Energy Standard (“RES”) Compliance Reports (EO-2020-0329 for Evergy Missouri Metro and EO-2020-0330 for Evergy Missouri West) and Evergy’s 2020 RES Compliance Plans (EO-2020-0331 for Evergy Missouri Metro and EO-2020-0332 for Evergy Missouri West).

2. Evergy will address the Staff and OPC comments in the following sections.

## **EVERGY RESPONSE TO STAFF COMMENTS ON RES COMPLIANCE REPORTS**

3. Staff's review verified that the Evergy RES Compliance Reports contain the information required by the Commission's RES rule.

4. Staff's review provides recommendations related to variance requests submitted by the Company related to the timing of renewable energy certificate (REC) retirements and the substitution of invoices instead of meter readings for energy purchases from wind power purchase agreements (PPAs). Evergy's responses follow.

5. **Recommendation:** Staff does not recommend the Commission grant the Company a limited waiver from the requirements of 40 CSR 4240-100(8)(A)1.I.(V) requested on April 15, 2020, to substitute invoices or another reasonable substitute when meter readings are not available for energy purchases from its wind PPAs. Staff will provide an additional recommendation after the Company provides the invoices and the information requested in Data Request No. 0002 (DR-0002).

**Response:** As noted in Evergy's compliance filing, the Company does not have access to the invoices because access to the Evergy headquarters building is limited due to COVID-19 restrictions. Additionally, documents responsive to DR-0002 are located at the Evergy headquarters building. Once access to the building is restored, the documents will be provided to Staff within a reasonable timeframe.

## **EVERGY RESPONSE TO STAFF COMMENTS ON RES COMPLIANCE PLANS**

6. Staff conducted its review of Evergy's RES Compliance Plans and concluded that the Company has met the minimum filing requirements of 20 CSR 4240-20.100(8)(B). The Company agrees that this rule sets forth what the Compliance Plan needs to contain and that the filing requirements have been met.

**EVERGY RESPONSE TO OPC COMMENTS ON  
RES COMPLIANCE REPORTS AND PLANS**

7. OPC asserts that the 2019 RES Compliance Reports and 2020 RES Compliance Plans show an “incomplete picture” of the status and cost of Evergy’s renewable resources. Further, OPC provides recommendations intended to generate additional information describing Evergy’s renewable energy resources in RES filings. OPC’s desire for a more complete picture of Evergy’s renewable energy position is well beyond the scope of the RES compliance requirements and there is nothing in the RES rules which would require the reporting of the additional information requested by OPC. In addition, the costs and benefits related to Evergy’s renewable resources are more appropriately addressed as part of rate case and fuel adjustment clause proceedings.

8. Evergy’s response to OPC’s specific recommendations follows.

9. **Recommendation:** OPC recommends identification of exactly which of Evergy’s non-solar resources are meeting its non-solar RES requirements.

**Response:** Given that RECs are retired each year for RES compliance, the identification of the resources used for compliance is available and can be included in future RES compliance reports.

10. **Recommendation:** OPC recommends that Evergy provide a detailed, itemized, complete list of all costs for its renewable resources.

**Response:** Under the RES requirements, Evergy does provide costs for meeting RES compliance. The costs for renewable resources that are outside the scope of the RES Compliance Plan and Reporting process are included in other regulatory filings, such as rate cases and integrated resource plans. These additional resources are part of the overall portfolio to provide customers with renewable energy beyond

RES compliance requirements. These resources include wind PPAs that are a component of Evergy's overall energy supply portfolio and wind PPAs to be used to satisfy large customer demands for renewable energy. Such resources should not be included in RES reporting as they are not used to meet RES requirements.

11. **Recommendation:** OPC recommends that Evergy provide a detailed discussion regarding wind PPAs entered into for its Schedule RER, Renewable Energy Rider program ("RER program") and the status of the program.

**Response:** Since the RER program is offered specifically to meet large customer demands for renewable energy and the Renewable Energy Credits ("RECs") belong to the customer, not Evergy, this program is outside the scope of the RES Compliance Plan and Reporting process.

12. **Recommendation:** OPC recommends that Evergy provide a detailed discussion on how the RER program PPAs are to be treated with respect to the RES.

**Response:** The RER program PPAs are designed to meet large customer demand for renewable energy. The ownership of RECs generated under the RER program will be transferred to the participating customer or retired on behalf of the customer, and the RECs cannot be used for RES compliance. Therefore, there is no need for a detailed explanation of how RER PPAs are to be treated with respect to the RES.

13. **Recommendation:** OPC recommends that Evergy provide a detailed discussion of the designation of renewable/non-renewable status of the PPAs it entered into for the RER program.

**Response:** As indicated in the previous answer, the renewable energy used for the RER program cannot be used for RES compliance and is therefore outside the scope

of the RES Compliance Plan and Reporting process. Information on the specific resources used for the RER program will be listed, per the RER tariff, in the tariff.

14. **Recommendation:** OPC recommends that Evergy Missouri Metro and Evergy Missouri West clarify its share of the Jayhawk wind PPA.

**Response:** Subsequent to OPC's filed recommendations in this case, the Company, OPC and Staff discussed the current allocation status of various wind PPAs, including Jayhawk. The final allocation of Jayhawk has not yet been made.

**WHEREFORE,** the Company submits its responses to the Staff and OPC filings in each of the above-discussed dockets.

Respectfully submitted,

*/s/ Roger W. Steiner*

Robert J. Hack, MBN 36496

Phone: (816) 556-2791

E-mail: [rob.hack@evergy.com](mailto:rob.hack@evergy.com)

Roger W. Steiner, MBN 39586

Phone: (816) 556-2314

E-mail: [roger.steiner@evergy.com](mailto:roger.steiner@evergy.com)

Evergy, Inc.

1200 Main – 16<sup>th</sup> Floor

Kansas City, Missouri 64105

Fax: (816) 556-2787

**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 13<sup>th</sup> day of July 2020, to all parties of record.

*/s/ Roger W. Steiner*

Roger W. Steiner