BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Application of Evergy) Kansas Metro Seeking Commission) Approval of the Proposed Changes to its Net) Metering For Renewable Energy Sources) Tariff.)

Docket No. 20-KCPE-217-TAR

NOTICE OF FILING OF REPORT AND RECOMMENDATION

COMES NOW, the Staff of the State Corporation Commission of the State of Kansas

("Staff" and "Commission," respectively) and respectfully files its Report and Recommendation

("R&R") regarding Evergy Kansas Metro Inc.'s ("Evergy Kansas Metro") proposed changes to its

Net Metering for Renewable Energy Sources Tariff (i.e., Schedule NM). Staff recommends the

Commission approve Evergy Kansas Metro's Schedule NM, as submitted.

WHEREFORE, Staff respectively submits its R&R, requests the Commission adopt such,

and for any other relief the Commission deems just and reasonable.

Respectfully submitted,

/s/ Robert Elliott Vincent Robert Elliott Vincent, S. Ct. No. 26028 Senior Litigation Counsel 1500 S.W. Arrowhead Road Topeka, KS 66604 Phone: (785) 271-3273 E-mail: r.vincent@kcc.ks.gov Attorney for Commission Staff Utilities Division 1500 SW Arrowhead Road Topeka, KS 66604-4027

Susan K. Duffy, Chair Shari Feist Albrecht, Commissioner Dwight D. Keen, Commissioner



Phone: 785-271-3220 Fax: 785-271-3357 http://kcc.ks.gov/

Laura Kelly, Governor

REPORT AND RECOMMENDATION UTILITIES DIVISION

- TO: Chair Susan K. Duffy Commissioner Shari Feist Albrecht Commissioner Dwight D. Keen
- **FROM:** Tim Stringer, Utility Engineer Leo Haynos, Chief Engineer Jeff McClanahan, Director
- **DATE:** April 14, 2020
- **SUBJECT:** 20-KCPE-217-TAR: In the Matter of the Application of Evergy Kansas Metro Seeking Commission Approval of the Proposed Changes to its Net Metering For Renewable Energy Sources Tariff

EXECUTIVE SUMMARY:

On November 8, 2019, Evergy Kansas Metro filed an Application requesting revisions to its Net Metering for Renewable Energy Sources (NM) tariff. The proposed changes include requiring a one-line wiring diagram with system plans. Evergy Kansas Metro is further proposing to remove the Interconnection Agreement from the tariff, all of which will align the Net Metering tariff with the structure of its Parallel Generation Contract Service tariff.¹ These changes will also align the tariff with Evergy Kansas Central's Net Metering Rider (NMR) tariff approved in 18-WSEE-493-TAR. Staff recommends the Commission approve the Application.

BACKGROUND:

On August 6, 2019, the Commission approved modification to Evergy Kansas Central's (Westar) NMR tariff in Docket 18-WSEE-493-TAR (18-493). The modifications to the NMR tariff aligned the structure of the tariff with Westar's Parallel Generation Rider, simplified the tariff instructions, and made updates to the Interconnection Agreement to address safety concerns.

In the subject Docket, Evergy Kansas Metro (FKA KCP&L) filed its Application on November 8, 2019, to adopt the same format as the recently approved Evergy Kansas Central NMR tariff.

¹ Application, p. 1.

ANALYSIS:

Staff's review determined the Evergy Kansas Metro Application and tariff changes are consistent with the changes approved by the Commission in Evergy Kansas Central's NMR tariff. As in the 18-493 Docket, the proposed changes will streamline the NM application process and update adoption of certain industry standards regarding interconnection safety. In addition to providing an updated Application process, the adoption of essentially the same application process across the Evergy operating areas will provide standardization in instructions to Distributed Energy Resource installers.

RECOMMENDATION:

Staff recommends the Commission approve Evergy Kansas Metro Net Metering tariff, NM as submitted in the Application.

CERTIFICATE OF SERVICE

20-KCPE-217-TAR

I, the undersigned, certify that a true and correct copy of the above and foregoing Notice of Filing of Report and Recommendation was served via electronic service this 17th day of April, 2020, to the following:

TIA ALEXANDER, SR. REGULATORY ANALYST EVERGY METRO, INC D/B/A EVERGY KANSAS METRO ONE KANSAS CITY PL, 1200 MAIN ST 19TH FLOOR KANSAS CITY, MO 64105 Fax: 816-556-2110 tia.alexander@kcpl.com ROBERT VINCENT, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 Fax: 785-271-3354 r.vincent@kcc.ks.gov

Jacolesa

Vicki Jacobsen