KANSAS CITY POWER & LIGHT COMPANY (KCPL)

2011 ANNUAL RENEWABLE ENERGY STANDARD COMPLIANCE REPORT

Prepared in Compliance with 4 CSR 240-20.100

15-April-2012



SECTION 1: INTRODUCTION

Kansas City Power & Light Company ("KCPL"), a Missouri Corporation, has filed its 2012 Annual Renewable Energy Standard Compliance Report in compliance with the Missouri Public Service Commission's ("Commission") Electric Utility Renewable Energy Standard Requirements [4 CSR 240-20.100] ("Rule") that became effective September 30, 2010. Section (7) of the rule requires that each public utility file with the Commission a Renewable Energy Standard (RES) Compliance Report by April 15 of each year.

Specifically, Section 7 (A) of the rule requires the following information for the most recently completed calendar year.

- A. Total retail electric sales for the utility, as defined by the Rule;
- B. Total jurisdictional revenue from the total retail electric sales to Missouri customers as measured at the customers' meters;
- C. Total retail electric sales supplied by renewable energy resources, as defined by section 393.1025(5), RSMo, including the source of the energy;
- 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;
- E. The number of RECs acquired, sold, transferred, or retired by the utility during the calendar year;
- F. The source of all RECs acquired during the calendar year;
- G. The identification, by source and serial number, of any RECs that have been carried forward to a future calendar year;
- 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 electric utility;

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- For acquisition of electrical energy and/or RECs from a renewable energy resource that is not owned by the electric utility, the following information for each resource that has a rated capacity of ten (10) kW or greater:
 - a. Name, address, and owner of the facility
 - b. An affidavit from the owner of the facility certifying 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;
 - c. The renewable energy technology utilized at the facility;
 - d. The dates and amounts of all payments from the electric utility to the owner of the facility; and
 - e. All meter readings used for calculation of the payments referenced in part (IV) of this paragraph;
- J. The total number of customers that applied and received a solar rebate in accordance with section (4) of the Rule;
- K. The total number of customers that were denied a solar rebate and the reason(s) for denial;
- L. The amount of funds 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;
- M. An affidavit documenting the electric utilities compliance with the RES compliance plan as described in this section during the calendar year. This affidavit will include a description of the amount of over- or under-compliance costs that shall be adjusted in the electric utility's next compliance plan; and
- N. If compliance was not achieved, an explanation why the electric utility fail to meet the RES.

This 2011 Report represents KCPL's efforts to achieve the requirements of 4 CSR 240-20.100.

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SECTION 2: RES COMPLIANCE REPORT

Rule (7)(A) 1: This annual RES compliance report shall provide the following information for the most recently completed calendar year, as defined by the Rule.

2.1 <u>RULE (7)(A) 1 A:</u>

Total retail electric sales for the utility, as defined by the Rule;

KCPL-MO
(MWh)
8,747,836

2.2 <u>RULE (7)(A) 1 B:</u>

Total jurisdictional revenue from the total retail electric sales to Missouri customers as measured at the customers' meter;

KCPL-MO
\$758,662,542

2.3 <u>RULE (7)(A) 1 C:</u>

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

The Spearville generation reported for Missouri is based on our energy allocation presumption.

	KCPL-MO (MWh)
Spearville I	215,901
Spearville II	109,145

2.4 <u>RULE (7)(A) 1 D:</u>

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

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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;

The numbers presented below Spearville generation reported for Missouri is based on our energy allocation presumption.

Source	Number created by electrical energy produced by renewable energy resources owned by the utility.	Value of Energy Created	Calculated value for each source and each category of REC
KCPL-MO	MWh	\$	\$
Spearville I	215,901	5,412,638	0
Spearville II	109,145	2,736,265	0

The RECs created from Spearville I and II are on the books at zero value since they are a additional benefit from generation that is already in the existing rate structure.

2.5 <u>RULE (7)(A) 1 E</u>

The number of RECs required, sold, transferred, or retired by the utility during the calendar year;

KCPL utilizes the North American Renewable Registry ("NARR") as recommended by Staff and approved by the Commission for tracking of all RECs.

	KCP	L-MO
	RECs	S-RECs
Required	171,458	3,499
Sold	0	0
Transferred	0	0
Retired	171,458	3,499

2.6 <u>RULE (7) (A) 1 F</u>

The source of all RECs acquired during the calendar year;

KCPL did not acquire any RECs in 2011 for Missouri compliance.

2.7 <u>RULE (7)(A) 1 G</u>

The identification, by source and serial number, of any RECs that have been carried forward to a future calendar year;

Please refer to Attachment A of this document for a list RECs carried forward to a future calendar year by source and serial number.

2.8 <u>RULE (7)(A) 1 H</u>

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 electric utility;

There were no sales of RECs and RECs acquired were either utilized for calendar year 2011 compliance or left in KCPL's NARR account for future use.

2.9 <u>RULE (7)(A) 1 I</u>

For acquisition of electrical energy and/or RECs from a renewable energy resource that is not owned by the electric utility, the following information for each resource that has a rated capacity of ten (10) kW or greater;

KCPL did not acquire any electrical energy and/or RECs from a renewable energy resource in 2011.

2.10 RULE (7)(A) 1 J

The total number of customers that applied and received a solar rebate in accordance with section (4) of the Rule;

	KCPL-MO
Applied	64
Received	39

2.11 RULE (7)(A) 1 K

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

	KCPL-MO
Denied	0
Reason	Not Applicable

2.12 RULE (7)(A) 1 L

The amount of funds 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;

	KCPL
Solar Rebates	\$1,305,290

On October 31, 2011, KCPL filed a joint application with GMO asking the Commission to grant a variance from the Commission's renewable energy standards rule to allow both parties to delay filing a standard offer contract for the purchase of solar renewable energy credits beyond the November 1, 2011 submission date. A variance was granted permitting the delay of filing tariff sheets detailing the provisions of a standard offer contract for the purchase of solar renewable energy credits for 2011 compliance until November 1, 2012.

2.13 <u>RULE (7)(A) 1 M</u>

An affidavit documenting the electric utility's compliance with the RES compliance plan as described in this section during the calendar year. This affidavit will include a description of the amount of over- and under- compliance costs that shall be adjusted in the electric utility's next compliance plan;

On April 15, 2011, KCPL filed a Compliance Plan covering the calendar years 2011 – 2013. In accordance with that filing, KCPL indicated RECs created by generation at

Spearville wind farm, located outside the state of Missouri, would be utilized for compliance. KCPL retired 171,458 vintage 2008 RECs in order to meet its 2011 non-solar compliance obligation.

Also in that filing, KCPL indicated S-RECs were acquired from a third party, 3Degrees Group. KCPL retired 3,499 vintage 2010 S-RECs in order to meet its 2011 solar compliance obligation.

The total costs incurred towards meeting compliance with Missouri's RES for calendar year 2011 is:

Resource	Capital and/or O&M Cost
Spearville wind farm (KCPL_MO)	\$1,610,429
Solar Rebates	\$1,305,290
S-RECs (for compliance)	\$28,972
NAR Administration	\$88,903

2.14 RULE (7)(A) 1 N

If compliance was not achieved, an explanation why the electric utility failed to meet the RES;

The utility has made every effort to comply and believes it has achieved compliance with Missouri's Renewable Energy Standard for 2011.

2011 Annual Renewable Energy Standard Compliance Report Kansas City Power & Light Company

Attachm	Attachment A : RECs carried forward to future calendar year	r year	-	. KCPL-MO
NAR ID	Asset	Fuel /Project Type	Certificate Vintage	Certificate Serial Numbers
IMP103	CPA - Ironwood Prison - SunE CPA CDC2, LLC	Solar	May-10	IMP-WREGIS-REC-103-CA-05-2010-901-132 to 295
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Mar-09	NAR-REC-41-KS-03-2009-832-16357 to 37466
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Dec-11	NAR-REC-41-KS-12-2011-2504-1 to 30158
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Feb-11	NAR-REC-41-KS-02-2011-1361-26363 to 27901
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Apr-09	NAR-REC-41-KS-04-2009-834-1 to 35355
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	May-09	NAR-REC-41-KS-05-2009-836-1 to 29117
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Jun-09	NAR-REC-41-KS-06-2009-838-1 to 23988
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Dec-09	NAR-REC-41-KS-12-2009-850-12901 to 30287
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Nov-09	NAR-REC-41-KS-11-2009-848-10298 to 24175
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Oct-09	NAR-REC-41-KS-10-2009-846-14470 to 33969
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Sep-09	NAR-REC-41-KS-09-2009-844-8780 to 20610
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Aug-09	NAR-REC-41-KS-08-2009-842-12878 to 30232
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Jul-09	NAR-REC-41-KS-07-2009-840-10046 to 23582
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Mar-10	NAR-REC-41-KS-03-2010-856-16102 to 37583
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Feb-10	NAR-REC-41-KS-02-2010-854-10191 to 23787
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Jan-10	NAR-REC-41-KS-01-2010-852-11282 to 26333
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Jul-10	NAR-REC-41-KS-07-2010-864-12684 to 29604
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Aug-10	NAR-REC-41-KS-08-2010-866-11803 to 27548
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Sep-10	NAR-REC-41-KS-09-2010-868-11746 to 27415
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Oct-10	NAR-REC-41-KS-10-2010-870-12438 to 29030
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Nov-10	NAR-REC-41-KS-11-2010-885-13950 to 32561
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Apr-10	NAR-REC-41-KS-04-2010-858-15484 to 36142
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	May-10	NAR-REC-41-KS-05-2010-860-13554 to 31636
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Jun-10	NAR-REC-41-KS-06-2010-862-11714 to 27342
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Dec-10	NAR-REC-41-KS-12-2010-1104-14315 to 27885
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Mar-11	NAR-REC-41-KS-03-2011-1397-20670 to 32397
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Jun-11	NAR-REC-41-KS-06-2011-1453-25485 to 39530

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Kansas City Power & Light Company 2011 Annual Renewable Energy Standard Compliance Report

Attachment A : RECs carried forward to future calendar year

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	Δ = = = = = = = = = = = = = = = = = = =	Fuel /Project	Certificate	Contificato Corial Numbers
	Assel	Type	Vintage	
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	May-11	NAR-REC-41-KS-05-2011-1420-22059 to 34260
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Apr-11	NAR-REC-41-KS-04-2011-1400-23211 to 36581
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Sep-11	NAR-REC-41-KS-09-2011-2385-15022 to 22842
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Oct-11	NAR-REC-41-KS-10-2011-2394-24564 to 38181
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Nov-11	NAR-REC-41-KS-11-2011-2434-23460 to 37383
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Jul-11	NAR-REC-41-KS-07-2011-1740-16871 to 25808
GEN41	Spearville Wind Energy Facility - Spearville 1	Wind	Aug-11	NAR-REC-41-KS-08-2011-1751-14812 to 22796
GEN159	Spearville Wind Energy Facility - Spearville II	Wind	Dec-11	NAR-REC-159-KS-12-2011-2506-1 to 14947
GEN159	Spearville Wind Energy Facility - Spearville II	Wind	Dec-10	NAR-REC-159-KS-12-2010-1106-1 to 5527
GEN159	Spearville Wind Energy Facility - Spearville II	Wind	Jan-11	NAR-REC-159-KS-01-2011-1172-1 to 8286
GEN159	Spearville Wind Energy Facility - Spearville II	Wind	Feb-11	NAR-REC-159-KS-02-2011-1386-1 to 14923
GEN159	Spearville Wind Energy Facility - Spearville II	Wind	Mar-11	NAR-REC-159-KS-03-2011-1398-1 to 16005
GEN159	Spearville Wind Energy Facility - Spearville II	Wind	Apr-11	NAR-REC-159-KS-04-2011-1404-1 to 17773
GEN159	Spearville Wind Energy Facility - Spearville II	Wind	May-11	NAR-REC-159-KS-05-2011-1419-1 to 17396
GEN159	Spearville Wind Energy Facility - Spearville II	Wind	Jun-11	NAR-REC-159-KS-06-2011-1454-1 to 20148
GEN159	Spearville Wind Energy Facility - Spearville II	Wind	Jul-11	NAR-REC-159-KS-07-2011-1739-1 to 13698
GEN159	Spearville Wind Energy Facility - Spearville II	Wind	Aug-11	NAR-REC-159-KS-08-2011-1750-1 to 11889
GEN159	Spearville Wind Energy Facility - Spearville II	Wind	Sep-11	NAR-REC-159-KS-09-2011-2386-1 to 12334
GEN159	Spearville Wind Energy Facility - Spearville II	Wind	Oct-11	NAR-REC-159-KS-10-2011-2395-1 to 19340
GEN159	Spearville Wind Energy Facility - Spearville II	Wind	Nov-11	NAR-REC-159-KS-11-2011-2433-1 to 17554
GEN159	Spearville Wind Energy Facility - Spearville II	Wind	Jan-11	NAR-REC-159-KS-01-2011-1172-8287 to 13420

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KCPL-MO