## **BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI**

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In the Matter of Kansas City Power & Light Company's Submission of its 2012 RES Compliance Plan

Case No. EO-2012-0348

In the Matter of KCP&L Greater Missouri Operations Company's Submission of its 2012 RES Compliance Plan

Case No. EO-2012-0349

## **AFFIDAVIT OF ABBY HERL**

## STATE OF MISSOURI ) ) ss COUNTY OF JACKSON )

Abby Herl, being first duly sworn on her oath, states:

1. My name is Abby Herl. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Manager – Fuels, Emissions & RECs.

2. On April 15, 2011, Kansas City Power & Light Company (KCP&L) filed a Compliance Plan covering the calendar years 2011-2013. In accordance with that filing, KCP&L indicated Renewable Energy Credits (RECs) created by generation at Spearville wind farm, located outside the state of Missouri, would be utilized for compliance. KCP&L retired 171,458 vintage 2008 RECs in order to meet its 2011 non solar compliance obligation. Also in that filing, KCP&L indicated Solar-RECs (S-RECs) were acquired from a third party, 3Degrees Group. KCP&L retired 3,499 vintage 2010 S-RECs in order to meet its 2011 solar compliance obligation.

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

Resource Cost	Capital and O&M Costs
Spearville wind farm (KCPL	
MO)	\$1,610,429
Solar Rebates	\$1,305,290
S-RECs (for compliance)	\$28,972
NAR Administration	\$88,903
Total	\$3,033,594

4. There are no over- or under-compliance costs that shall be adjusted in KCP&L's next compliance plan.

5. On April 15, 2011, KCP&L Greater Missouri Operations Company (GMO) filed a Compliance Plan covering the calendar years 2011-2013. In accordance with that filing, GMO indicated RECs created by generation at Gray County wind farm, located outside the state of Missouri, would be utilized for compliance. Energy and associated RECs are acquired through a Purchase Power Agreement with Gray County Wind Energy. GMO retired 160,617 vintage 2008 and 2009 RECs in order to meet its 2011 non-solar compliance obligation. Also in that filing, GMO indicated S-RECs were acquired from a third party, 3Degrees Group. GMO retired 3,278 vintage 2010 S-RECs in order to meet its 2011 solar compliance obligation.

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

Resource Cost	Capital and O&M Costs
Solar Rebates	\$1,351,670
S-RECs (for compliance)	\$27,142
NAR Administration	\$46,775
Total	\$1,425,587

7. There are no over- or under-compliance costs that shall be adjusted in GMO's next compliance plan.

8. I have knowledge of the matters set forth therein. I hereby swear and affirm that this information is true and accurate to the best of my knowledge, information and belief.

Abby Herl

Subscribed and sworn before me this 15th day of May, 2012.

Mica. A. Lee Notary Public

My commission expires: <u>FUB. 42015</u>

**NICOLE A. WEHRY** Notary Public - Notary Seal State of Missouri Commissioned for Jackson County My Commission Expires: February 04, 2015 Commission Number: 11391200