

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

In the Matter of Evergy Metro, Inc. d/b/a Evergy)
Missouri Metro’s 2021 Triennial Compliance) File No. EO-2021-0035
Filing Pursuant to 20 CSR 4240-22)

In the Matter of Evergy Missouri West, Inc.)
d/b/a Evergy Missouri West’s 2021 Triennial) File No. EO-2021-0036
Compliance Filing Pursuant to 20 CSR 4240-22)

COMMENTS OF RENEW MISSOURI

COMES NOW, Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”),
and offers its Comments regarding Evergy’s 2021 Integrated Resource Plan:

Deficiency 1

Renew Missouri is concerned that Company has not fully complied with the 2020 Special
Contemporary issue that it should:

- (1) Assess the value of a solar tariff that encourages distributed solar installers to optimize the direction that solar panels face to provide more kWh during the utility’s peak and provide maximum benefits for all utility customers
- (2) Conduct a Value of Solar study to inform efforts relating to integrated resource planning. A Value of Solar study is a comprehensive analysis of the cost avoided and benefits created for the grid, electricity customers, and society as result of the generation of solar energy. Because solar energy is often interconnected at the distribution level of the grid, such a study, done correctly, will capture distribution level benefits and costs that cannot be captured by wholesale level avoided cost estimates. The immediate benefit of such a study is to understand the contributions and costs related to distributed solar generation beyond simplistic and subjective

allegations of cross subsidies. The utility's Value of Solar study should consider the National Association of Regulatory Utility Commission's Distributed Energy Resources Rate Design and Compensation manual, National Renewable Energy Laboratory's Value of Solar: Program Design and Implementation Considerations, and the National Energy Screening Project's National Standard Practice Manual for Distributed Energy Resources among any other industry guidance on value of solar study development and implementation.

Within its report, the Company offers its interpretation of the order but does not adequately comply. Its analysis should treat its evaluation of benefits and costs symmetrically, and all relevant and material impacts must be included, even if they are hard to quantify.

WHEREFORE, Renew Missouri respectfully submits its Comments.

Respectfully,

/s/ Tim Opitz

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 27th day of September 2021:

/s/ Tim Opitz
