# EVERGY MISSOURI METRO

# 2020 ANNUAL RENEWABLE ENERGY STANDARD COMPLIANCE PLAN

**April 15, 2020**

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## SECTION 1: INTRODUCTION

Evergy Missouri Metro ("EMM" or "Company"), a Missouri Corporation, has filed its 2020 Annual Renewable Energy Standard Compliance Plan ("2020 Plan") in compliance with the Missouri Public Service Commission's ("Commission") Electric Utility Renewable Energy Standard Requirements [4 CSR 240-20.100] that became effective September 30, 2010 and as amended by Missouri House Bill 142 becoming law on August 28, 2013. Section (8) of the rule requires that each public utility file with the Commission a Renewable Energy Standard (RES) Compliance Plan by April 15 of each year.

Specifically, Section 8 (B) of the rule requires that the plan cover the current year and the immediately following two (2) calendar years. The RES compliance plan shall include, at a minimum:

A. A specific description of the electric utility's planned actions to comply with the RES;

B. A list of executed contracts to purchase RECs (Renewable Energy Credits) (whether or not bundled with energy), including type of renewable energy resource, expected amount of energy to be delivered, and contract duration and terms;

C. The projected total retail electric sales for each year;

D. Any differences, as a result of RES compliance, from the utility's preferred resource plan as described in the most recent electric utility resource plan filed with the commission in accordance with 4 CSR 240-22, Electric Utility Resource Planning;

E. A detailed analysis providing information necessary to verify that the RES compliance plan is the least cost, prudent methodology to achieve compliance with the RES;

F. A calculation of the RES retail impact limit calculated in accordance with section (5) of this rule. The calculation should be accompanied by workpapers including all the relevant inputs used to calculate the retail impact limits for the planning interval which is included in the RES compliance plan. The electric utility may designate all or part of those calculations as highly confidential, proprietary, or public as appropriate under the commission's rules; and

G. Verification that the utility has met the requirements for not causing undue adverse air, water, or land use impacts pursuant to subsection 393.1030.4. RSMo, and the regulations of the Department of Natural Resources.

The 2020 Plan represents EMM's planned renewable compliance efforts that are currently underway and that will continue through 2020-2022 to achieve the requirements of 4 CSR 240-20.100.

# SECTION 2: RES COMPLIANCE PLAN

***Rule (8) (B) 1: The plan shall cover the current year and the immediately following two (2) calendar years. The RES compliance plan shall include, at a minimum -***

## 2.1 RULE (8) (B) 1 A:

***A specific description of the electric utility's planned actions to comply with the RES;***

### 2.1.1 NON-SOLAR COMPLIANCE

EMM generates renewable energy at its wholly-owned Spearville 1 and 2 wind facilities located in Kansas and will continue to do so during the 2020-2022 RES Compliance Plan period. The 100.5 MW Spearville 1 began commercial operation in 2006, and the 48 MW Spearville 2 began commercial operation in 2010.

Additionally, to date EMM has Power Purchase Agreements (PPAs) for nearly 1,080 MW of wind capacity from eight wind facilities having a total of 1,525 of total wind capacity. Table 1 below provides information regarding EMM's wind resources used to meet RES requirements.

## Table 1: EMM Wind Resources Information

| Project Name | Contracting Parent Company | Location | Project Size (MW) | MO Metro Share (MW) | COD Date | Term (Years) | Expected Annual Energy (MWh) |
|---|---|---|---|---|---|---|---|
| Cimarron II | Duke / Sumitomo | Gray County, KS | 131.1 | 131.1 | 6/1/2012 | 20 | 549,446 |
| Spearville 3 | EDF Renewable Energy | Ford County, KS | 100.8 | 100.8 | 10/1/2012 | 20 | 465,308 |
| Slate Creek | EDF Renewable Energy | Slate County, KS | 150 | 150 | 12/30/2015 | 20 | 590,167 |
| Waverly | EDP Renewables | Coffey County, KS | 200 | 200 | 1/4/2016 | 20 | 782,594 |
| Osborn | NextEra | DeKalb County, MO | 200 | 120 | 12/15/2016 | 20 | 428,466 |
| Rock Creek | Enel Green Power, NA | Atchison County, MO | 300 | 180 | 11/8/2017 | 20 | 644,750 |
| Pratt | NextEra | Pratt County, KS | 244 | 110 | 12/13/2018 | 30 | 438,246 |
| Prairie Queen | EDP Renewables | Allen County, KS | 200 | 90 | 8/12/2019 | 20 | 350,031 |
| Total | | | 1525 | 1081 | | | |

EMM expects to have banked RECs available to meet its RES requirements based on RECs unexpired at the end of 2019, in addition to the RECs created from wind facilities' actual generation. Accordingly, the RECs generated from these renewable resources in addition to the banked RECs will fulfill EMM's Missouri RES non-solar requirements for the 2020-2022 RES Compliance Plan period shown in Table 3 below.

### 2.1.2 SOLAR COMPLIANCE

EMM anticipates that the acquisition of Solar Renewable Energy Credits (SRECs), principally from EMM retail customers that have received rebates for solar facility installations, will be sufficient for compliance with the Missouri solar energy requirements for the 2020-2022 RES Compliance Plan period. The SRECs will be transferred to EMM from qualified customer-generator's operational solar electric systems as a condition of receiving the solar rebate, a change instituted with Missouri House Bill 142 becoming law on August 28, 2013. SRECs produced from these solar electric systems will be transferred to EMM for a period of 10 years.

In addition, as part of the SmartGrid project, EMM constructed the solar installations shown in Table 2 below.

**Table 2: EMM SmartGrid Solar Installations**

| Installation | Completion Date | Size (kW) |
|---|---|---|
| Paseo High School | Apr-12 | 99.18 |
| Innovation Park – KCP&L Midtown | Oct-12 | 5.0 |
| Midwest Research Institute | May-13 | 10.56 |
| Blue Hills Solar | May-13 | 10.08 |
| UMKC Flarsheim Hall | Jul-13 | 4.32 |
| UMKC Student Union | Jul-13 | 5.28 |
| Evergy Crosstown Substation | Apr-14 | 29.33 |
| KCMO Swope Parkway | Jun-14 | 9.54 |
| Total | | 173.3 |

These solar installations were part of the plan to install approximately 180 kW of utility owned and operated solar in and around the SmartGrid demonstration project area. The generation from these facilities will be distributed to EMM's service territory and is expected to provide qualified SRECs. The final installation of SmartGrid solar was completed in the second quarter of 2014. Due to lien and legal restrictions, no solar facilities were installed on residential properties.

Also, in 2016 EMM acquired a building (Evergy Connect) at 1710 Paseo in Kansas City, Missouri that contains a 25 kW solar facility. The facility qualifies for RES compliance. The facility began providing energy to the grid in June 2016.

### 2.1.3 STANDARD OFFER CONTRACT

EMM does not have a Standard Offer Contract tariff in place at this time.

## 2.2 RULE (8) (B) 1 B:

***A list of executed contracts to purchase RECs (whether or not bundled with energy), including type of renewable energy resource, expected amount of energy to be delivered, and contract duration and terms;***

Table 1 above provides the details of EMM's wind PPAs, estimated energy output, and contract duration.

It should be noted that the estimated generating output reflects the total (100%) expected output of the wind facilities. The Missouri portion of the estimated output is significantly above what is expected to be needed for non-solar RES compliance.

To comply with the Missouri 2020-2022 solar RES requirements, EMM expects to utilize SRECs transferred from qualified customer-generator's operational solar electric systems as a condition of receiving the solar rebate. Those SRECs will be registered through the North American Renewables Registry.

## 2.3 RULE (8) (B) 1 C:

***The projected total retail electric sales for each year;***

EMM's projected Missouri retail electric sales and associated RES requirements are provided in Table 3 below.

**Table 3: EMM Projected Missouri Retail Sales and RES Requirements**

| Year | Projected Retail Electric Sales (MWh) | Non-Solar Req. (MWh) | Solar Req. (MWh) |
|---|---|---|---|
| 2020 | 8,344,462 | 817,757 | 16,689 |
| 2021 | 8,302,006 | 813,597 | 16,604 |
| 2022 | 8,278,458 | 1,216,933 | 24,835 |

## 2.4 RULE (8) (B) 1 D:

***Any differences, as a result of RES compliance, from the utility's preferred resource plan as described in the most recent electric utility resource plan filed with the commission in accordance with 4 CSR 240-22, Electric Utility Resource Planning;***

The RES Compliance Plan detailed in this report, mirrors the renewables plan in the 2020 Integrated Resource Plan on March 10, 2020 under Case EO-2020-0280. This 2020 RES Compliance Plan includes the current status of wind resource additions which are described above, and it reflects the latest retail MWh sales forecasts.

## 2.5 RULE (8) (B) 1 E

***A detailed analysis providing information necessary to verify that the RES compliance plan is the least cost, prudent methodology to achieve compliance with the RES;***

The existing Spearville 1 wind generating facility (Phase 1) being utilized for non-solar compliance was installed prior to passage of the RES rules and was justified

and constructed as part of EMM's Comprehensive Energy Plan. The 48 MW Spearville 2 facility was constructed in 2010. Accordingly, the wind energy provided by this facility represents the least cost approach for achieving non-solar compliance for the 2020-2022 RES Compliance.

In August 2011, a wind generation RFP was issued to cover EMM and Evergy Missouri West non-solar requirements. An evaluation of the proposals received was conducted and resulted in execution of two separate 20-year PPAs. The first PPA was with Duke Energy Renewables and Sumitomo Corp for the Cimarron II wind facility, and the second with EDF Renewable Energy for the 100.8 MW Spearville 3 wind facility.

Additionally, EMM executed 20-year PPAs for wind facilities in-service as follows: with EDP Renewables for Waverly and Prairie Queen, with EDF Renewable Energy for Slate Creek, with NextEra Energy Resources for Osborn and Pratt, and with Enel Green Power, NA for Rock Creek.

Note that these wind contracts were entered because of favorable economics to take advantage of low-cost energy prices and not directly attributable to RES compliance. These PPAs will also be used to meet future EMM non-solar RES requirements.

### 2.5.1 THIRD PARTY SOLAR SREC PROCUREMENT

EMM believes it will not require any additional third party SRECs for the foreseeable future, based on the inclusion of SRECs transferred from qualified customer-generator's operational solar electric systems as a condition of receiving solar rebates, along with future solar installations to be owned by EMM.

## 2.6 RULE (8) (B) 1 F

***A calculation of the RES retail impact limit calculated in accordance with section (5) of this rule. The calculation should be accompanied by workpapers including all the relevant inputs used to calculate the retail impact limits for the***

***planning interval which is included in the RES compliance plan. The electric utility may designate all or part of those calculations as highly confidential, proprietary, or public as appropriate under the commission's rules;***

See Section 3 of this RES Compliance Plan for a description of the retail rate impact calculation.

## 2.7 RULE (8) (B) 1 G

***Verification that the utility has met the requirements for not causing undue adverse air, water, or land use impacts pursuant to subsection 393.1030.4., RSMo, and the regulations of the division*** *[Division of Energy, Department of Economic Development].*

The qualified customer-generator's solar electric systems from which SRECs will be acquired to achieve solar RES compliance will not be owned by EMM, as customers would be responsible for ensuring that these facilities have not caused any undue adverse air, water, or land use impacts.

Wind generation specifically conforms to the eligible renewable energy resources listed in section (2) of Missouri Department of Economic Development – Division of Energy (MDED-DOE) rule 4 CSR 340-8.010. EMM's owned wind facilities, Spearville 1 and 2, comply with all local, state, and federal environmental regulations. All other PPA-contracted wind facilities listed in Table 1 above are owned by other entities are responsible for ensuring that they have not caused any undue adverse air, water, or land use impacts.

All generating facilities utilized by EMM to meet the requirements of the Missouri RES have, to its knowledge, received all necessary environmental and operational permits and are in compliance with any necessary federal, state and/or local requirements related to air, water and land use.

EMM will submit additional information as required by the MDED-DOE in order to review the energy sources and environmental impact so long as there are

appropriate provisions for confidential treatment of any sensitive information. EMM will grant or obtain access to facility sites and records for MDED-DOE.

# SECTION 3: RATE ANALYSIS

***PURPOSE: This report demonstrates compliance with 4 CSR 240-20.100(5) and determines the rate impact averaged over a ten-year period, and incorporating the effects of future greenhouse gas (GHG) legislation and compliance costs.***

## 3.1 RETAIL RATE IMPACT

***Rule (5)(A): The retail rate impact, as calculated in subsection (5)(B), may not exceed one percent (1%) for prudent costs of renewable energy resources directly attributable to RES compliance. The retail rate impact shall be calculated annually on an incremental basis for each planning year based on procurement or development of renewable energy resources averaged over the succeeding ten- (10-) year period. The retail rate impact shall exclude renewable energy resources owned or under contract prior to September 30, 2010.***

The retail rate impact was calculated by comparing a non-renewable generation and purchased power portfolio to a RES-compliant portfolio with sufficient renewable resources to achieve the renewable standards. For each year of the 2020-2022 RES Compliance Plan period, the retail rate impact is limited to a maximum of 1% of the 10-year average non-RES compliant revenue requirement. EMM has presumed that the solar requirements will be met primarily with SRECs transferred from qualified customer-generator's operational solar electric systems as a condition of receiving the solar rebate.

EMM has performed the rate impact calculation in accordance with the methodology as required by the RES rules. The Commission's order in Case No. ET-2014-0071,

which is final and non-appealable, provided that 1) EMM could suspend payment of solar rebates after making solar rebate payments of at least $36.5 million after August 31, 2012 which EMM did not do, and 2) A consistent retail rate impact methodology is still in dispute among stakeholders, but methods have been used within respective cases to address for each company. For 2020, 2021 and 2022, respectively, that calculation produces 0.135%, 0.143% and 0.148%.

## 3.2 TOTAL REVENUE REQUIREMENTS

***Rule (5)(B): The RES retail rate impact shall be determined by subtracting the total retail revenue requirement incorporating an incremental non-renewable generation and purchased power portfolio from the total retail revenue requirement including an incremental RES compliant generation and purchased power portfolio.***

***Rule (5)(B)1: The non-renewable generation and purchased power portfolio shall be determined by adding, to the utility's existing generation and purchased power resource portfolio excluding all renewable resources, additional non-renewable resources sufficient to meet the utility's needs on a least-cost basis for the next ten (10) years.***

***Rule (5)(B)2: The RES-compliant portfolio shall be determined by adding to the utility's existing generation and purchased power resource portfolio an amount of least cost renewable resources sufficient to achieve the portfolio requirements set forth in section (2) of this rule and an amount of least-cost non-renewable resources, the combination of which is sufficient to meet the utility's needs for the next ten (10) years.***

***Rule (5)(B)3: The cost of the RES-compliant portfolio shall also include the positive or negative cumulative carry-forward amount as determined in subsection (5)(G).***

EMM developed projected RES expenditures and calculated the retail rate impact based on procurement or development of renewable energy resources averaged

over the succeeding ten-year period. The details of the revenue requirement and rate impact calculation are provided in accompanying workpapers as required by Section (8) (B) 1 F of the RES rules.

EMM has performed the rate impact calculation in accordance with the methodology as required by the RES rules. See calculation above in section 3.1.

## 3.3 RESOURCE PLAN SOURCES

***Rule (5)(B)4: Assumptions regarding projected renewable energy resource additions will utilize the most recent electric utility resource planning analysis.***

The EMM RES Compliance Plan includes wind and solar resource additions based upon the assumptions used in the 2020 Integrated Resource Plan on March 10, 2020 under Case EO-2020-0280. As indicated above, this 2020 Plan reflects the current status of wind and solar resource additions, and these renewable additions are not required for compliance in this 2020-2022 plan period, as instead they will be used to achieve future RES compliance.

## 3.4 RATE IMPACT COMPARISON & DATA SOURCE

***Rule (5)(B)4 continued: These comparisons will be conducted utilizing incremental revenue requirement for new renewable energy resources, less the avoided cost for non-renewable energy resources due to the addition of renewable energy resources. Such avoided costs shall be limited to those that may be included in a utility's revenue requirement for setting rates In addition, the projected impact on revenue requirements by non-renewable energy resources shall include the expected value of greenhouse gas emissions compliance costs, assuming that such costs are made at the expected value of the cost per ton of greenhouse gas emissions allowances, cost per ton of a greenhouse gas emissions tax (e.g., a carbon tax), or the cost per ton of greenhouse gas emissions reductions for any greenhouse gas emission reduction technology that is applicable to the utility's generation***

***portfolio, whichever is lower. Calculations of the expected value of costs associated with greenhouse gas emissions shall be derived by applying the probability of the occurrence of future greenhouse gas regulations to expected level(s) of costs per ton associated with those regulations over the next ten (10) years. The impact on revenue requirements by non-renewable energy resources shall also include consideration of environmental risks other than those related to regulation or greenhouse gases. Any costs included to reflect consideration of such risks shall be limited to those that may be included in a utility's revenue requirement for setting rates. Any variables utilized in the modeling shall be consistent with values established in prior rate proceedings, electric utility resource planning filings, or RES compliance plans, unless specific justification is provided for deviations. In no event shall the calculation of rate impact double count the cost of fuel or environmental compliance cost savings.***

During the 2020-2022 RES Compliance Plan period, EMM is not proposing to add any incremental renewable energy resources directly attributable to RES compliance as no additional renewable resources were required for compliance. The 10-year average non-RES compliant revenue requirement is based on the EMM 2020 IRP that includes the expected value of greenhouse gas compliance costs. The variables used are those from the 2020 EMM IRP.

## 3.5 SOLAR REBATES

***Rule (5)(C): Solar rebates payments made during any calendar year in accordance with section (4) of this rule shall be included in the cost of generation from renewable energy resources.***

Solar rebates have been included in the analysis as applicable and are in accordance with the Stipulation and Agreement filed October 3, 2013, Case Number ET-2014-0071. Per the Order dated March 9, 2016 and effective March 18, 2016, in File No. ET-2016-0185, the Commission granted EMM's application to cease

paying rebates for installing solar electric systems. In 2018, Senate Bill 564 initiated payment of rebates through 393.1670 RSMo.

Therefore, the table below shows projected amounts of solar rebates, administrative costs and expenditures associated with the renewable resources during the compliance period.

**Table 4: Solar Compliance Expenditures**

| Solar Compliance Expenditures | | | | | | |
|---|---|---|---|---|---|---|
| Year | S-REC Cost | Solar Rebates | NAR Administration & Other | Utility Scale Solar Builds Revenue Requirement | Smart Grid Solar Revenue Requirement | Total |
| 2020 | N/A | $ 1,588,669 | $ 46,693 | $ - | $ 88,958 | $ 1,724,321 |
| 2021 | N/A | $ 1,595,000 | $ 46,612 | $ - | $ 84,927 | $ 1,726,539 |
| 2022 | N/A | $ 938,725 | $ 46,612 | $ - | $ 80,671 | $ 1,066,008 |

## 3.6 ADJUSTMENTS

***Rule (5)(D): For purposes of the determination in accordance with subsection (B) of this section, if the revenue requirement including the RES-compliant resource mix, averaged over the ten- (10-) year period, exceeds the revenue requirement that includes the non-renewable resource mix by more than one percent (1%), the utility shall adjust downward the proportion of renewable resources so that the average annual revenue requirement differential does not exceed one percent (1%). In making this adjustment, the solar requirement shall be in accordance with subsection (2)(D) of this rule. Prudently incurred costs to comply with the RES portfolio requirements, and passing this rate impact test, may be recovered in accordance with section (6) of this rule or through a rate proceeding outside or in a general rate case. When adjusting downward the proportion of renewable energy resources, in accordance with this subsection, the utility shall give first priority to reducing or eliminating the amount of RECs not associated with electricity delivered to Missouri customers.***

For the 2020-2022 RES Compliance Plan period, no additional renewable resources are required to meet the RES requirements, therefore no adjustments are necessary.

## 3.7 FEDERAL PROGRAM COSTS

***Rule (5)(E): Costs or benefits attributed to compliance with a federal renewable energy standard or portfolio requirement shall be considered as part of compliance with the Missouri RES if they would otherwise qualify under the Missouri RES without regard to the federal requirements.***

EMM does not have a federal renewable obligation at this time.

## 3.8 SOLAR REBATE SUSPENSION

***Rule (5)(F): If the electric utility determines the maximum average retail rate increase provided for in section (5) will be reached in any calendar year, the electric utility may cease paying rebates to the extent necessary to avoid exceeding the maximum average retail rate increase by filing a request with the commission, at least sixty (60) days in advance, to suspend the solar rebate provisions in its tariff for the remainder of the calendar year.***

Under the Commission's order in Case No. ET-2014-0071, if EMM determines the maximum average retail rate increase provided for in section (5) of these rules will be reached in any calendar year, it may cease paying rebates to the extent necessary to avoid exceeding the maximum average retail rate increase by filing a request with the commission, at least sixty days in advance, to suspend the solar rebate provisions it its tariff for the remainder of that calendar year. Accordingly, in an Order dated March 9, 2016 and effective March 18, 2016, in File No. ET-2016-0185, the Commission granted EMM's application to cease paying rebates for installing solar electric systems, and approved the substitute tariff sheets that implement the cessation of payments.

## 3.9 RES COMPLIANCE CARRY-FORWARD

***Rule (5)(G): The utility shall calculate for each actual compliance year an annual carry-forward amount. This amount shall be calculated as the positive or negative difference between the actual costs of RES compliance and an amount equal to the one percent (1%) cap, as calculated in subsection (5)(B), for the non-renewable generation and purchased power portfolio from its most recent annual RES compliance plan filed pursuant to subsection (7)(B) of this rule. The positive or negative cumulative carry-forward amount shall be calculated by accumulating the annual positive or negative annual carry-forward amounts. The initial cumulative carry-forward amount shall be equal to the sum of the annual carry-forward amounts for the period January 1, 2015, through December 31, 2015. Any annual carry-forward amounts shall be based on the revenue requirements analysis included in the utility's Annual RES Compliance Plan filed pursuant to subsection (8)(B) for each respective year. The positive or negative cumulative carry-forward amount shall be included in the cost of the RES-compliant portfolio for purposes of calculating the retail rate impact, as calculated in subsection (5)(B). Nothing in this subsection shall authorize recovery in excess of the one percent (1%) cap, as defined in subsection (5)(B).***

EMM calculated the retail rate impact and carry-forward amount in accordance with these RES rules including the illustration provided as Attachment A to the rules. The details of these calculations are provided in accompanying workpapers (Attachment A) as required by Section (8) (B) 1 F of the RES rules.

## 3.10 RELIANCE ON RETAIL RATE IMPACT

***Rule (5)(H): If in reliance on a calculation of the RRI as provided for herein, an electric utility commits to fund a utility-owned renewable energy resource, or contracts to acquire energy or capacity from a renewable energy resource that, based on the relied-upon RRI calculation would not cause the electric utility to exceed such RRI, then the prudently incurred***

***costs of such renewable energy resource and such energy and capacity shall constitute RES compliance costs even if including such costs in later calculations will cause the electric utility to exceed the RRI calculated at a later time. To the extent the prudently incurred costs of a utility-owned renewable energy resource, or contracted for energy or capacity from a renewable energy resource, cause an electric utility to exceed the RRI calculated at a later time, such excess sum shall be included in the determination of the carry-forward amount in accordance with subsection (5)(G).***

EMM has not committed to fund a utility-owned renewable energy resource, and has not contracted to acquire energy or capacity from a renewable energy resource that would impact the retail rate impact as described in the RES rules.

## 3.11 ADDITIONAL SOLAR REBATES

***Rule (5)(I): Not withstanding anything in subsection (5)(H), until June 30, 2020, if the maximum average retail rate increase, as calculated pursuant to subsection (5)(B) would be less than or equal to one percent (1%) if an electric utility's investment in solar-related projects initiated, owned, or operated by the electric utility is ignored for purposes of calculating the increase, then additional solar rebates shall be made available and included in rates in an amount up to the amount that would produce a retail rate increase equal to the difference between a one percent (1%) retail rate increase and the retail rate increase calculated when ignoring an electric utility's investment in solar projects initiated, owned, or operated by the electric utility.***

No additional solar rebates were made available as per the Order dated March 9, 2016 and effective March 18, 2016, in File No. ET-2016-0185, the Commission granted EMM's application to cease paying rebates for installing solar electric systems, and approved the substitute tariff sheets that implement the cessation of payments.

It should be noted that solar rebates currently being distributed are based upon Senate Bill 564 and are therefore not associated with RES requirements.

## 3.12 RATE CALCULATIONS FILING

***Rule (5)(J): Each electric utility shall calculate its actual calendar year RRI each year and shall file those calculations as part of its annual RES compliance plan. The electric utility may designate all or part of those calculations as highly confidential, proprietary, or public as appropriate under the commission's rules.***

The details of the revenue requirement and rate impact calculation are provided in workpapers (Attachment A) accompanying this RES Compliance plan as required by the RES rules.