

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of)	
NORTHERN STATES POWER COMPANY)	Case No. U-21455
for approval of interconnection procedures)	
pursuant to R 460.920.)	
_____)	

At the March 13, 2025 meeting of the Michigan Public Service Commission in Lansing,
Michigan.

PRESENT: Hon. Daniel C. Scripps, Chair
Hon. Katherine L. Peretick, Commissioner
Hon. Alessandra R. Carreon, Commissioner

ORDER

Background

On April 24, 2023, the Commission issued an order in Case No. U-20890 adopting the Interconnection and Distributed Generation Standards (also known as the MIXDG rules), which are codified at Mich Admin Code, R 460.901a *et seq.*, and became effective on April 25, 2023. Included in the MIXDG rules is Mich Admin Code, R 460.920 (Rule 20), which reads (in pertinent part) as follows:

Rule 20. (1) An electric utility shall file applications for approval of interconnection procedures and forms within 120 calendar days of the effective date of these rules.

(2) The commission shall issue its order approving, rejecting, or modifying an electric utility's proposed interconnection procedures and forms within 360 calendar days of the electric utility filing an application for approval of interconnection procedures and forms. If the commission finds the procedures and forms proposed by the electric utility to be inadequate or unacceptable, the commission may either adopt procedures and forms proposed by another person in

the proceeding or modify and accept the procedures and forms proposed by the electric utility.

(3) Until the commission accepts, rejects, or modifies an electric utility's interconnection procedures and forms, the electric utility may use the proposed interconnection procedures and forms when processing interconnection applications with the exception of fixed fees and fee caps. An electric utility shall only charge fees that comply with the requirements of R 460.926 until the commission accepts, rejects, or modifies the proposed interconnection procedures and forms, unless the commission approves different fees pursuant to R 460.926(5).

(4) Two or more electric utilities may file a joint application proposing interconnection procedures for use by the joint applicants. The proposed interconnection procedures must ensure compliance with these rules.

(5) The proposed interconnection procedures must, at a minimum, include all of the following:

- (a) All necessary applications, forms, and relevant template agreements.
- (b) A schedule of all applicable fixed fees and fee caps.
- (c) Voltage ranges for high voltage distribution and low voltage distribution.
- (d) Required initial review screens.
- (e) Required supplemental review screens.
- (f) The process for conducting system impact studies and facilities studies on DERs [distributed energy resources] when there is an affected system issue.
- (g) Testing and certification requirements of DER telecommunications, cybersecurity, data exchange, and remote control operation.
- (h) Parallel operation requirements.
- (i) A method to estimate the expected annual kWh [kilowatt-hour] output of the generator or generators.
- (j) If an electric utility uses alternative methods for power limited export DER pursuant to R 460.980(3), a description of those methods.
- (k) A cost allocation methodology for study track DERs.
- (l) An evaluation of an interconnection application for a project that includes single or multiple types of DERs at a site for which the applicant seeks a single point of common coupling.
- (m) Details describing how an energy storage device may be integrated into an existing legacy net metering program system without impacting the 10-year grandfathering period or participation in the distributed generation program.
- (n) For electric utilities that are member-regulated electric cooperatives, a procedure for fairly processing applications in instances in which the number of applications exceed the capacity of the electric cooperative to timely meet the deadlines in these rules.
- (o) Examples of modifications that are not material modifications.
- (p) The procedure for performing a material modification review to determine if a modification is material.
- (q) Any required terms and conditions that must be specified in the general liability insurance for level 3, 4, and 5 projects.
- (r) A list of the electric utility's holidays.
- (s) If an electric utility uses an alternative process pursuant to R 460.956, a

description of that process.

(t) Fast track eligibility criteria for applications proposing to interconnect DERs with 4.8 kV [kilovolt] distribution systems.

(u) In the event daytime loading data is not available for the initial screen provided in R 460.946(5)(b), the date when the data will be collected.

Additionally, Mich Admin Code, R 460.910 (Rule 10) reads as follows:

An electric utility, customer, alternative electric supplier, applicant, or interconnection customer may apply to the commission for a waiver from 1 or more provisions of these rules and may request expeditious processing. The commission may grant a waiver upon a showing of good cause and a finding that the waiver is in the public interest.

The May 18, 2023 order in Case No. U-21117 (May 18 order) directed the rate-regulated electric utilities to file draft interconnection procedures (MIXDG or interconnection procedures) in the Case No. U-21117 docket by June 16, 2023, and directed the Commission Staff (Staff) to hold a working session for interested persons on June 21, 2023, to allow for input regarding the draft MIXDG procedures. The May 18 order required final MIXDG procedures to be filed no later than August 23, 2023, per the requirements of Rule 20(1).

On August 18, 2023, Northern States Power Company (NSP-W), a Wisconsin corporation and wholly owned subsidiary of Xcel Energy Inc., filed an application in this docket, along with supporting testimony and exhibits, seeking approval of proposed MIXDG procedures, forms, agreements, and rule waivers. On September 28, 2023, the Commission issued an order in this docket soliciting comments and reply comments on NSP-W's application. On October 27, 2023, the Staff filed comments, and on November 13, 2023, NSP-W filed reply comments and a revised exhibit.

On February 8, 2024, the Commission issued an order in Case Nos. U-21455 *et al.* (February 8 order) addressing the changes to the statutory requirements for interconnection resulting from the passage of Public Act 235 of 2023 (Act 235). In the February 8 order, the

Commission: (1) rejected NSP-W's proposed MIXDG procedures due to the statutory changes; (2) directed NSP-W to file a new application for proposed MIXDG procedures in this docket by March 22, 2024; (3) allowed for additional initial and reply comments to be filed in this docket no later than May 22 and June 5, 2024, respectively; and (4) invited comments on a Standard Level 1, 2, and 3 Interconnection Agreement in Case No. U-21543.

On March 20, 2024, NSP-W filed a revised application, along with supporting testimony and exhibits from Benjamin G. Kaldunski, Energy and Environmental Policy Analyst in the Regulatory Affairs Department of NSP-W, seeking approval of revised MIXDG procedures, forms, and agreements, and rule waivers (application). On May 22, 2024, the Staff filed comments on NSP-W's application and attached a Sample Interconnection Agreement for Level 4 and 5 and Non-Certified Projects (Staff's comments). On June 5, 2024, NSP-W filed reply comments (reply comments). The Commission also notes that in the July 23, 2024 order in Case No. U-21543 (July 23 order), the Commission approved the Standard Level 1, 2, and 3 Interconnection Agreement for Projects Up To 550 kW [kilowatts] With Certified Equipment (Standard Level 1, 2, and 3 Interconnection Agreement).

On March 6, 2025, NSP-W filed a second revised application with revised exhibits but no additional supporting testimony (amended application). The amended application seeks approval of revised exhibits and requests additional rule waivers.

The Applications and Comments

In its application, NSP-W requests the following three waivers pursuant to Rule 10 and Mich Admin Code, R 460.926(5) (Rule 26(5)), which allows for a waiver from fees and fee caps. First, the company requests a permanent waiver from the timelines set forth in Mich Admin Code, R 460.908 (Rule 8) for situations when an interconnection application triggers

the Midcontinent Independent System Operator, Inc.'s (MISO's) Affected System Study (AFS) requirements. Application, p. 4. Rule 8 governs the timelines associated with interconnection for electric utilities serving fewer than one million customers in Michigan and applies to MIXDG rules Mich Admin Code, R 460.911 through R 460.1026 (all of the interconnection and distributed generation (DG) standards). NSP-W states that the AFS requirements include quarterly review cycles that would cause the company to exceed the timelines for action governed by Rule 8.

Second, NSP-W requests a waiver from Mich Admin Code, R 460.926(3)(c) (Rule 26(3)(c)), which imposes a \$10,000 fee cap on the system impact study, in order to raise that amount to \$15,000. NSP-W states that this is what the company is charged by its third-party vendor for performing a system impact study. Application, p. 4.

Third, NSP-W requests a waiver from Mich Admin Code, R 460.942 (Rule 42) and 460.980(4) (Rule 80(4)) based on the characteristics of the company's distribution system infrastructure. Rule 42 governs non-export track review, and Rule 80(4) requires electric utilities to allow interconnection of limited-export or non-exporting DERs. NSP-W states that its "distribution system has limited SCADA [supervisory control and data acquisition] capabilities and power relays that do not extend to the grid edge. Allowing export-limited and non-export DERs to interconnect to the distribution system without such capabilities will expose the Company to increased safety and operational risks." Application, p. 5.

In his testimony in support of the application, Mr. Kaldunski states that Exhibit A-1 contains NSP-W's proposed interconnection procedures, Exhibit A-2 contains the proposed forms, and Exhibit A-3 contains redlined tariff sheets. He explains that NSP-W operates primarily in northwestern Wisconsin (98% of its revenues are derived from Wisconsin

operations) and that it has a small service territory in the western tip of the Upper Peninsula of Michigan. Kaldunski testimony, p. 4. Mr. Kaldunski adds that NSP-W has four customers taking service under a DG tariff and four interconnection applications under review. *Id.*, p. 5. Along with seeking authorized procedures and waivers, he explains that NSP-W is seeking authority to make minor revisions to its DG tariffs to conform those tariffs to the requirements of Act 235 and the MIXDG rules, and the redlined tariff sheets are available in Exhibit A-3. These changes include updates to the tariff language to remove references to methane digesters, to update changes to the previous year's peak demand, to update the capacity limit, and other revisions to conform to the current law. Kaldunski testimony, pp. 8-10.

Mr. Kaldunski states that NSP-W seeks alternative language regarding indemnity and liability in order to ensure that its interconnection agreement does not conflict with language in the company's tariff C2.11. Kaldunski testimony, p. 14. He further asks that the Commission clarify that tariff C2.11 supersedes any conflicting interconnection agreement template language. In place of the language proposed by the Staff, Mr. Kaldunski requests that the interconnection agreement simply provide as follows: "Each Party to this Agreement shall at all times assume liability as governed by the utility's effective tariff, terms, and conditions." *Id.* He states that this language would allow tariff C2.11 to continue to control, and adds that tariff C2.11 was approved by the Commission in Case No. U-15152.¹ *Id.* He also recommends liability language approved by the Public Service Commission of Wisconsin.

Mr. Kaldunski describes the requested waivers. He states that the waiver from Rule 8 would only be applied in situations where the MISO AFS process is triggered; and he adds that

¹ Case No. U-15152 was a 2007 rulemaking proceeding that resulted in revision of the rules governing the filing of tariffs.

the \$60,000 MISO AFS DER fee would also be imposed in that situation. *Id.*, pp. 17-20. He states that the waiver from Rule 26(3)(c) is required because the company's contractors charge \$15,000 for the system impact study. *Id.*, p. 19. Mr. Kaldunski states that the waiver from Rules 42 and 80(4) is required due to the limited SCADA capabilities described in the application. He states that export-limited and non-export DERs "will expose the Company to increased safety and operational risks." *Id.*, p. 20. Mr. Kaldunski adds that:

NSP-W will incur distribution system upgrade costs for substations, transformers, relays, and other protective equipment whether a DER injects output onto the system, or whether it reduces load behind the meter. Non-export customers thereby cause system upgrades costs due to the reduction of load on a given substation but are not required to pay for the system upgrades, which are then borne by all non-DER customers. This is a violation of the cost-causers are cost-payers principle of utility ratemaking. Finally, the utilities within the NSP System do not currently have processes in place to accommodate the export-limited and non-export DERs contemplated in R 460.942 and R 460.980(4). The Company would need to establish a new process to facilitate these types of DER interconnection applications. The cost and administrative burden associated with creating this new process is not justified based on NSP-W's relatively small Michigan service territory, and the small number of current and expected DER customers seeking to interconnect with the Company's Michigan distribution system.

Kaldunski testimony, p. 21.

In its comments, the Staff addresses the three waiver requests. Beginning with Rule 8, the Staff states that:

this waiver is unnecessary as the rules already consider this situation in R460.954(2) [Rule 54(2)] by stating "*When an interconnection application is delayed due to an affected system issue, informal mediation pursuant to R 460.904, formal mediation pursuant to R 460.906, or a complaint pursuant to R 792.10439 to R 792.10446, other interconnection applications that were placed into the study track on a later date may progress in the order in which the interconnection applications were placed into the study track.*" This language is intended to place a project's application that triggers an AFS on hold until MISO completes this study.

Staff's comments, p. 1 (emphasis in original).

Regarding Rule 26(3)(c), the Staff supports a two-year waiver to allow the higher system

impact study fee, with the Staff authorized to review the actual study costs, should they arise, during that time. Staff's comments, p. 1.

Regarding Rules 42 and 80(4), the Staff supports a two-year waiver "due to the Company's less advanced infrastructure. In the interim, Staff would like to meet with the Company's distribution engineers to better understand these limits." Staff's comments, p. 2.

Thereafter, the Staff suggests several changes to Exhibits A-1 and A-2. *Id.*, pp. 2-4.

In its reply comments, NSP-W reiterates its request for a waiver from Rule 8 because the waiver will eliminate the need for NSP-W to undergo formal or informal mediation. Reply comments, p. 3. NSP-W asks that, if the waiver is denied, the Commission provide guidance on how to "establish a uniform mediation process under Rule 904 and/or Rule 906" that is tailored to the MISO AFS process. NSP-W also agrees to the majority of the Staff's suggested revisions (as summarized in Attachment 1 to the reply comments), with the exception of the issues addressed in this order. Reply comments, pp. 5-8, and Attachment 1. NSP-W states, however, that it does not agree with the Staff's recommendation to adopt the Level 4 and 5 interconnection agreement for non-certified Level 1, 2, and 3 DERs, and states that "NSP-W will not accept any application that utilizes non-certified equipment in order to maintain the safety and reliability of the distribution system." *Id.*, p. 7. The company also reiterates its request for alternative liability language, and the associated request to revise tariff C2.11 if necessary based on the Commission's determination. Finally, the company requests approval of the proposed tariff revisions in Exhibit A-3.

In the amended application, NSP-W states that it seeks a waiver from Rule 26(2). However, the amended application provides no further information on the nature of that waiver or the reason for the request. Amended application, p. 2. NSP-W also requests a waiver from

Mich Admin Code, R 460.966(3) (Rule 66(3)). NSP-W states that it:

requests a waiver from R 460.966(3) requiring utilities to conduct an in-person site visit within 20 days. NSP-W has a scheduling lead time of approximately 30 days and it can be challenging to meet the 20 day requirement due to the fact that contracts [sic] must travel from Minneapolis, Minnesota to the Upper Peninsula of Michigan to conduct these site visits.

Amended application, p. 6. The amended application is accompanied by Revised Exhibits A-1 and A-2. NSP-W represents that these exhibits reflect changes to comply with Act 235 and are in agreement with the Staff's proposed changes, as described in NSP-W's reply comments.

Discussion

The Commission finds that NSP-W has provided sufficient evidence in support of its requested waiver from Rule 26(3)(c). Mr. Kaldunski provided testimony that the company's third-party vendor charges \$15,000 for the system impact study. Kaldunski testimony, p. 19. The Commission grants the two-year waiver, conditioned upon compliance with the Staff's request to review actual system impact study costs.

The Commission also finds that NSP-W has provided sufficient evidence in support of its requested waivers from Rules 42 and 80(4), but finds that one-year waivers would be more appropriate. Mr. Kaldunski explained why the company cannot comply with the requirements regarding non-export and limited export inverters, based on its distribution system characteristics and the limited number of potentially-affected customers. *See*, Kaldunski testimony, pp. 20-21. In discussions with the Staff, NSP-W pointed out concerns about the company's inability to monitor these projects, which may expose the distribution grid to increased safety and operational risks, as well as cost allocation concerns. The Commission finds good cause for both waivers for one year, and finds that the waivers are in the public interest. Because these waivers allow NSP-W to forgo offering interconnection via the non-

export and limited export tracks, the Commission finds that these waivers should be limited to one year rather than two. The Commission directs NSP-W to modify its interconnection procedures to explain how it plans to study projects utilizing non-export and export-limiting capabilities. The grant of these temporary waivers is conditioned on compliance with the Staff's request to meet with the company's distribution engineers. The company may reapply for the waivers when they expire.

However, the Commission agrees with the Staff and finds that the requested waiver from Rule 8 should be denied. The Staff has shown that Rule 54(2) adequately addresses the situation that NSP-W is concerned with (the triggering of the MISO AFS requirements) and provides that the relevant application would be placed on hold. The Commission does not find that NSP-W has demonstrated good cause for the requested waiver or that the waiver is in the public interest per Rule 10. The Commission also declines to offer yet another mediation process when the MIXDG rules already provide for both formal and informal mediation, but also notes that Rule 54(2) does not require that mediation be occurring in order to place the affected application on hold; the application need only be delayed by an "affected system issue." *See*, Rule 54(2). Once it is placed on hold, the application need no longer comply with the timelines governed by Rule 8.

The Commission also finds that the two waivers requested in the amended application should be denied. The requested waiver from Rule 26(2) is not reflected in NSP-W's revised exhibits and is unsupported by evidence. The requested waiver from Rule 66(3)² is likewise unsupported by evidence, and the amended application does not demonstrate good cause for

² Since Rule 66(3) does not address the timing of the on-site inspection of a DER, NSP-W may have meant to reference Rule 66(4)(a) or (b).

the waiver from this rule or that the waiver is in the public interest, as required by Rule 10.

NSP-W's application states that it will not accept any interconnection project that utilizes non-certified equipment in order to maintain the safety and reliability of the distribution system. In discussions with the Staff, NSP-W clarified that the limitation it describes applies only to non-certified inverter-based projects due to the fact that customers have ample certified inverters to select for their projects. The Commission accepts NSP-W's refusal to accommodate non-certified inverters and finds that this does not require a waiver from any MIXDG rule.

The Commission finds that NSP-W should utilize the same indemnity language that the Commission has approved for all other providers. NSP-W proposes to use a single sentence addressing liability that simply refers to the company's current tariff terms and conditions. *See*, Kaldunski testimony, p. 14. However, tariff C2.11 governs the nature and quality of general electric service. Tariff C2.11.B. provides as follows:³

The Company shall not be liable for interruptions in the service, phase failure or reversal, or variations in the service characteristics, or for any loss or damage of any kind or character occasioned thereby, due to causes or conditions beyond the Company's control, and such causes or conditions shall be deemed to specifically include but not be limited to the following: acts or omissions of customers or third parties; operation of safety devices, except when such operation is caused by the negligence of the Company; absence of an alternate supply of service; failure, malfunction, breakage, necessary repairs or inspection of machinery, facilities or equipment when the Company has carried on a program of maintenance consistent with the general practices prevailing in the industry; act of God; war; action of the elements; storm or flood; fire; riot; labor dispute or disturbances; or the exercise of authority or regulation by governmental or military authorities.

The Commission observes that, while acceptable for general service, this language does not

³ Though not introduced in the comments of this proceeding, all rate-regulated electric utility tariffs are publicly available on the Commission's website at: <https://www.michigan.gov/mpsc/consumer/electricity/data-price/electric-rate-books>.

actually address service that is associated with interconnection. In contrast, the relevant language adopted in the July 23 order for the Standard Level 1, 2, and 3 Interconnection Agreement reads as follows:

Except as set forth in Section 3.2 above, as between the Parties, unless caused by the sole negligence or intentional wrongdoing of the other Party, each Party to this Agreement shall at all times assume all liability for, any and all damages, losses, claims, demands, suits, recoveries, costs, legal fees, and expenses to the extent caused by its directors, officers, employees, and agents: (a) for injury to or death of any person or persons whomsoever occurring on its own system, and/or (b) for any loss, destruction of or damage to any property of third persons, firms, corporations or other entities occurring on its own system, including environmental harm or damage arising out of or resulting from, either directly or indirectly, the Interconnection Facilities or the DER, or arising out of or resulting from, either directly or indirectly, any electric energy furnished to it hereunder after such energy has been delivered to it by such other Party.

July 23 order, Exhibit A, p. 6, Paragraph 7.1. Per the July 23 order, this language applies to Levels 1-3. This language is patterned after the language adopted for Category 1 and 2 projects in the December 20, 2012 order in Case No. U-15919 (December 20 order), Attachment G, p. 5.

The Federal Energy Regulatory Commission (FERC) Large Generator Interconnection Agreement (LGIA) indemnity reads as follows:

The Parties shall at all times indemnify, defend, and hold the other Party harmless from, any and all damages, losses, claims, including claims and actions relating to injury to or death of any person or damage to property, demand, suits, recoveries, costs and expenses, court costs, attorney fees, and all other obligations by or to third parties, arising out of or resulting from the other Party's action or inactions of its obligations under this LGIA on behalf of the Indemnifying Party, except in cases of gross negligence or intentional wrongdoing by the indemnified Party.

186 FERC ¶ 61,199 (March 21, 2024), *Improvements to Generator Interconnection Procedures*

and Agreements, Docket No. RM22-14-001 (Order No. 2023-A), Appendix D, p. 80.⁴ The FERC

Small Generator Interconnection Agreement (SGIA) indemnity reads as follows:

The Parties shall at all times indemnify, defend, and hold the other Party harmless from, any and all damages, losses, claims, including claims and actions relating to injury to or death of any person or damage to property, demand, suits, recoveries, costs and expenses, court costs, attorney fees, and all other obligations by or to third parties, arising out of or resulting from the other Party's action or failure to meet its obligations under this Agreement on behalf of the indemnifying Party, except in cases of gross negligence or intentional wrongdoing by the indemnified Party.

Id., Appendix F, p. 23. Thus, FERC has adopted explicit mutual indemnifications for all project levels.

The Commission agrees with FERC, and, further, sees no reason to deviate from the findings in the July 23 and December 20 orders. As it has for all other providers, the Commission finds that this indemnification language shall also apply to Level 1-5 projects for NSP-W. *See*, Case Nos. U-21477, U-21479, U-21480, U-21481, U-21482, and U-21483. Thus, the Commission directs NSP-W to revise Revised Exhibits A-1 and A-2, where necessary, to reflect the language adopted in the July 23 order quoted above.

Turning to tariffs, the Commission notes that NSP-W also included requests for approvals of its tariff sheets Pg-4, Pg-5, and DG tariff sheets in Case No. U-21793, a docket pertaining to approval of DG tariff sheets, and in Case No. U-21819, a docket pertaining to NSP-W's compliance with the Public Utility Regulatory Policies Act of 1978, PL 95-617; 92 Stat 3117 (with the exception of the DG tariff sheets). The tariff sheets filed in those dockets are not consistent with the changes the utility requested in the instant docket in Exhibit A-3. Due to the discrepancy between the requested changes in this docket and those in Case Nos. U-

⁴ Order No. 2023-A is available at <https://www.ferc.gov/media/e1-rm22-14-001>; *see, id.*, pp. 875 and 1,033 of 1,063 for the quoted indemnities (accessed March 2, 2025).

21793 and U-21819, the Commission finds that approval of NSP-W's updated DG tariff sheets, except for tariff sheets D-47.50 and D-47.70, is appropriate for Case No. U-21793. The order in that docket will issue simultaneously with the instant order. Approval of tariff sheets D-47.50 and D-47.70 will be addressed in Case No. U-21819. The Commission also invites NSP-W to file an application in the instant docket or in a standalone docket to revise tariff C2.11 if the company believes that the tariff must be revised to conform to the indemnity language that is approved in the instant order.

The Commission approves MIXDG procedures, forms, and agreements for NSP-W as reflected in Revised Exhibits A-1 and A-2, and as further described in this order. The Commission finds that NSP-W shall utilize the statewide Standard Level 1, 2, and 3 Interconnection Agreement approved in the July 23 order for certified projects. NSP-W is granted a two-year waiver from the provisions of Rule 26(3)(c).

THEREFORE, IT IS ORDERED that:

A. Within 30 days of the date of this order, Northern States Power Company shall file in this docket interconnection procedures, forms, and agreements consistent with the findings in this order.

B. Northern States Power Company shall utilize the Standard Level 1, 2, and 3 Interconnection Agreement for Projects Up To 550 Kilowatts With Certified Equipment approved in the July 23, 2024 order in Case No. U-21543 for certified projects; and, within 30 days of the date of this order, Northern States Power Company shall file in this docket a Level 4 and 5 and Non-Certified Projects Interconnection Agreement consistent with the findings in this order.

C. Northern States Power Company is granted a two-year waiver, commencing on the date

of this order, from the provisions of Mich Admin Code, R 460.926(3)(c), and is authorized to charge a maximum system impact study fee of \$15,000 during that time, as described in this order.

D. Northern States Power Company is granted a one-year waiver, commencing on the date of this order, from the provisions of Mich Admin Code, R 460.942 and R 460.980(4), as described in this order.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, pursuant to MCL 462.26. To comply with the Michigan Rules of Court's requirement to notify the Commission of an appeal, appellants shall send required notices to both the Commission's Executive Secretary and to the Commission's Legal Counsel. Electronic notifications should be sent to the Executive Secretary at LARA-MPSC-Edockets@michigan.gov and to the Michigan Department of Attorney General - Public Service Division at sheacl@michigan.gov. In lieu of electronic submissions, paper copies of such notifications may be sent to the Executive Secretary and the Attorney General - Public Service Division at 7109 W. Saginaw Hwy., Lansing, MI 48917.

MICHIGAN PUBLIC SERVICE COMMISSION

Daniel C. Scripps, Chair

Katherine L. Peretick, Commissioner

Alessandra R. Carreon, Commissioner

By its action of March 13, 2025.

Lisa Felice, Executive Secretary

PROOF OF SERVICE

STATE OF MICHIGAN)

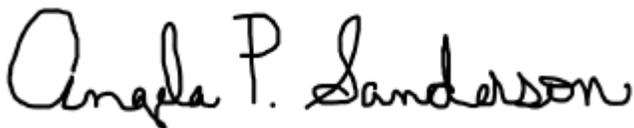
Case No. U-21455

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on March 13, 2025 A.D. she electronically notified the attached list of this **Commission Order via e-mail transmission**, to the persons as shown on the attached service list (Listserv Distribution List).


Brianna Brown

Subscribed and sworn to before me
this 13th day of March 2025.



Angela P. Sanderson
Notary Public, Shiawassee County, Michigan
As acting in Eaton County
My Commission Expires: May 21, 2030

Service List for Case: U-21455

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