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August 4, 2025

Ms. Lisa Felice  
Executive Secretary  
Michigan Public Service Commission  
7109 West Saginaw Highway  
Lansing, MI 48917

Re: In the matter of the Application of **DTE ELECTRIC COMPANY** for approval of its integrated resource plan pursuant to MCL 460.6t, and for other relief.  
MPSC Case No. U-21193 (Paperless e-file)

Dear Ms. Felice:

Attached for electronic filing in the above captioned matter is DTE Electric Company's *ex parte* Application and supporting Exhibits 1, 2 and 3. Also attached is the Proof of Service.

Very truly yours,

Mark W. Madden

MWM/erb  
Attachments  
cc: Service List

**STATE OF MICHIGAN**

**BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

In the matter of the Application of **DTE** )  
**ELECTRIC COMPANY** for approval )  
of its integrated resource plan pursuant )  
to MCL 460.6t, and for other relief. )  
\_\_\_\_\_ )

Case No. U-21193

**APPLICATION**

DTE Electric Company (“DTE Electric” or the “Company”) respectfully requests that the Michigan Public Service Commission (“MPSC” or the “Commission”), by and through Commission Staff serving as its Relevant Electric Retail Regulatory Authority (“RERRA”) documented representative<sup>1</sup>, provide written verification that the Company’s Monroe Storage Project, Fermi Storage Project, and Au Gres Solar Park Project (collectively, the “Projects”) meet the RERRA notification and verification requirements set forth in the Commission’s Order in Case No. U-21902 dated June 12, 2025 (“June 12 Order”) and should be considered in the Midcontinent Independent System Operators, Inc.’s (“MISO”) Expedited Resource Addition Study (“ERAS”) process. In support of this request, DTE Electric states as follows:

1. DTE Electric is a corporation organized and existing under and by virtue of the laws of the State of Michigan, with its principal office at One Energy Plaza, Detroit, Michigan 48226. DTE Electric is owned by DTE Electric Holdings, LLC, which is a wholly-owned subsidiary of DTE Energy, providing retail electric service to customers located in Michigan.

2. DTE Electric’s retail electric business is subject to the Commission’s jurisdiction

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<sup>1</sup> The June 12 Order, p. 7, states that “the Commission directs the Commission Staff (Staff) to approve requests on behalf of the Commission that meet the following specific criteria in an expeditious manner.”

pursuant to Michigan law, including certain provisions of 1939 PA 3, as amended, including 2016 PA 341, MCL 460.1 *et seq.*; 1909 PA 106, as amended, MCL 460.551 *et seq.*; 1909 PA 300, as amended, MCL 462.2 *et seq.*; and 2008 PA 295, as amended, MCL 460.1001 *et seq.* Under these statutory provisions, the Commission has the power and jurisdiction to regulate the Company's retail electric rates.

3. DTE Electric is subject to MISO's Open Access Transmission, Energy and Operating Reserve Markets Tariff ("Tariff") as an Investor-owned Utility ("IOU") Load-Serving Entity ("LSE"), including MISO's recently amended generator interconnection procedures ("GIP") that established the ERAS process. *See, Midcontinent Independent System Operator, Inc., FERC Docket No. ER25-2454-000, Order Accepting Tariff Revisions, Subject to Condition, July 21, 2025.*<sup>2</sup>

4. On July 21, 2025, the Federal Energy Regulatory Commission (FERC) issued an Order in Docket No. ER25-2454-000 accepting MISO's Tariff revisions associated with the ERAS process.<sup>3</sup> The ERAS process is intended to provide a framework for the accelerated study of generation projects that address resource adequacy and reliability needs within the MISO footprint in the near-term. MISO's window for ERAS applications to be submitted for the first cycle begins on August 6, 2025 and closes on August 11, 2025.

5. Understanding MISO's ERAS timeline as detailed in both its ERAS Informational Guide<sup>4</sup> and the FERC-approved revised Tariff language<sup>5</sup> is of critical importance to ensuring Michigan can successfully participate in the ERAS process. For reference, MISO's ERAS timeline

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<sup>2</sup> [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20250721-3077&optimized=false&sid=febe53ffc6e1-4b61-9fec-a4bc1a934c7e](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20250721-3077&optimized=false&sid=febe53ffc6e1-4b61-9fec-a4bc1a934c7e) (last accessed August 4, 2025).

<sup>3</sup> *Id.*

<sup>4</sup> MISO ERAS Informational Guide: <https://cdn.misoenergy.org/ERAS%20Informational%20Guide707493.pdf> (last accessed August 4, 2025).

<sup>5</sup> *See* Section 3.9, *et seq.*, MISO revised Tariff: [file:///C:/Users/U64204/Downloads/20250606-5228\\_FERC%20GENERATED%20TARIFF%20FILING.PDF](file:///C:/Users/U64204/Downloads/20250606-5228_FERC%20GENERATED%20TARIFF%20FILING.PDF) (last accessed August 4, 2025).

is as follows:

- **August 6, 2025:** ERAS effective date and MISO begins accepting ERAS applications for the first ERAS quarterly cycle up to 10 projects. Projects will be studied on a first-come, first-served basis, taking into consideration their application review results, which involves ensuring the projects meet the ERAS requirements. The study order is determined by the time stamp on their application in MISO’s online application tool and if their application is accepted. Any overflow beyond the 10 projects selected will be allocated to subsequent study cycles on a rolling basis, until all project slots are full.
- **August 11, 2025:** MISO stops accepting ERAS applications for the first ERAS quarterly cycle.
- **August 11, 2025 to September 2, 2025:** MISO will notify applicants of any ERAS application deficiencies followed by a 10-business day cure period. To be considered a valid ERAS request and accepted into a cycle, an application must meet all MISO ERAS requirements, including RERRA verification. Applicants will only have one opportunity to cure deficiencies. If after the cure period an application is not complete, the application will be withdrawn.<sup>6</sup>
- **September 2, 2025:** the ERAS process kicks-off for the first ERAS cycle.

As reflected in the above timeline, the absence of RERRA verification in an ERAS application will trigger a deficiency notice that must be cured within 10 business days. Thus, if the Commission’s RERRA verification is not expeditiously provided for inclusion in the Company’s ERAS application, the Company’s ERAS application likely will be rejected. Moreover, because MISO is accepting ERAS applications on a “first-come, first-served” rolling basis, there is a high likelihood that the entire ERAS compendium of 68 projects saturates beyond this limit for all five quarterly cycles during the initial weeks after the effective date. As a point of reference, the recent PJM Reliability Resource Initiative, while separate and distinct, received 94 applications for 50 project slots in just *ten* business days. DTE Electric is respectfully requesting Commission Staff to promptly review the Company’s RERRA application and issue verification letters for the

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<sup>6</sup> MISO ERAS Informational Guide, pp. 2-4:  
<https://cdn.misoenergy.org/ERAS%20Informational%20Guide707493.pdf> (last accessed August 4, 2025).

Projects to dovetail with MISO’s accelerated application window and avoid rejection of the corresponding ERAS applications.

### **MPSC RERRA VERIFICATION PROCESS**

6. The June 12 Order details Michigan’s RERRA verification process and the criteria that projects must meet in order to receive RERRA verification from the Commission Staff, as the Commission’s documented representative. The June 12 Order, p. 7, indicates that RERRA verification requests from IOUs, such as DTE Electric, must align with a Commission-approved Integrated Resource Plan (“IRP”), Clean Energy Plan, Renewable Energy Plan (“REP”), or certificate of need (CON), and is the winning bidder of an Request For Proposal (“RFP”) that meets the guidelines outlined in the Commission-approved competitive bidding guidelines adopted in the September 9, 2021, order in Case No. U-20802.

7. The Commission may issue updated RERRA notification and verification requirements in Case No. U-21902; nonetheless, the Commission determined that the RERRA notification requirements set forth in the June 12 Order shall apply unless and until a follow-up order is issued after FERC approval of MISO’s revised ERAS proposal. June 12 Order, p. 10 (“Should FERC approve MISO’s revised proposal earlier, and if interconnection customers file verification requests with the Commission, the Commission will apply the process described in the [June 12 Order] until such time as a follow-up order is issued”). Therefore, the Company’s Application and relief requested thereunder are filed pursuant to the June 12 Order.

### **OVERVIEW OF COMPANY-OWNED PROJECTS**

8. With this filing, DTE Electric is requesting the Commission’s RERRA verifications for three projects that are aligned with DTE Electric’s Commission-approved 2022 IRP in Case No. U-21193 and have been selected as the winning bidder of an RFP that meets the competitive

bidding guidelines. The Company is submitting the Monroe Storage Project, Fermi Storage Project, and Au Gres Solar Project for consideration in MISO's first ERAS cycle when it opens on August 6, 2025. The Projects are aligned with DTE Electric's 2022 IRP settlement agreement and the Proposed Course of Action, which was approved as the most reasonable and prudent means of meeting the Company's energy and capacity needs over the five-year, 10-year, and 15-year time horizons (July 26, 2023, Order in U-21193). DTE Electric respectfully requests Commission Staff to expeditiously review and issue RERRA verification letters for the following three projects:

**MONROE STORAGE PROJECT**

9. The Monroe Storage Project will be sited in Monroe County. The project will connect to the substation being constructed in Monroe County and is anticipated to provide 350 MW of battery storage nameplate capacity. The project supports the storage build plan included in DTE Electric's 2022 IRP settlement agreement as well as the statewide energy storage targets set forth in Public Act 235 of 2023. DTE Electric has 100% site control of the generator as well as the point of interconnection. The Monroe Storage Project is anticipated to provide 350 MW of capacity, which is below the maximum project size requirement. Network Resource Interconnection Service ("NRIS") has been requested for this generator. The Commercial Operation Date ("COD") of the Monroe Storage Project is expected to occur no later than Q2 2028.

**FERMI STORAGE PROJECT**

10. The Fermi Storage Project will be sited in Monroe County. The project will connect to the substation being constructed in Monroe County and is anticipated to provide 200 MW of battery storage nameplate capacity. The project supports the storage build plan included in DTE Electric's 2022 IRP settlement agreement as well as the statewide energy storage targets set forth in Public Act 235 of 2023. DTE Electric has 100% site control of the generator as well as the

point of interconnection. The Fermi Storage Project is anticipated to provide 200 MW of nameplate capacity, which is below the maximum project size requirement. NRIS has been requested for this generator. The COD of the Fermi Storage Project is expected to occur no later than Q4 2028.

### **AU GRES SOLAR PARK PROJECT**

11. The Au Gres Solar Park Project will be sited in Arenac County. The project will connect to the Au Gres Solar Park substation being constructed in Arenac County. The project supports the renewable build plan included in DTE Electric’s 2022 IRP settlement agreement. DTE Electric has 100% site control of the generator as well as the point of interconnection. The Au Gres Solar Park Project is anticipated to provide 175 MW of nameplate capacity, which is below the maximum project size requirement. NRIS has been requested for this generator. The COD of the Au Gres Solar Park Project is expected to occur no later than Q3 2028.

### **COMPETITIVE PROCUREMENT PROCESS**

12. The Au Gres Solar Park Project was selected in DTE Electric’s 2024 Renewable Energy Request for Proposals (“RFP”), and the Monroe Storage Project and Fermi Storage Project have been selected in DTE Electric’s 2025 Energy Storage RFP. The Company developed the RFPs in consultation with the MPSC Staff pursuant to and consistent with the December 4, 2008, Temporary Order and December 23, 2008, Amendatory Order in Case No. U-15800, the September 9, 2021, Competitive Procurement Guidelines (“Competitive Procurement Guidelines”) in Case No. U-20852, and the IRP Settlement Agreement (Case No. U-21193).

13. DTE Electric retained Guidehouse, Inc. (“Guidehouse”) to serve as an independent monitor (“IM”) of DTE Electric’s RFP processes and to leverage its experience with utilities across the United States in similar competitive procurements. The Company’s use of an IM conformed

to the Commission's Competitive Procurement Guidelines and the IRP Settlement Agreement.

14. Guidehouse provided support and oversight of the Company's RFP development, administration of the bidding, and proposal evaluation processes. Guidehouse's role as IM in the Company's RFP processes aligns with the definition of an IM in the Competitive Procurement Guidelines and is in accordance with Section 9 of the IRP Settlement Agreement.

15. In Case No. U-15800, Attachment D to the Commission's December 4, 2008, Temporary Order specifically provided that the "bid evaluation process may include an assessment of both price and non-price factors." Accordingly, the Company utilized scorecards that were reviewed by the MPSC Staff and were consistent with Attachment D to the December 4, 2008, Temporary Order in Case No. U-15800 and Exhibit No. A-33 (CLC-1) admitted in Case No. U-15806-RPS. The scorecards were also consistent with the Competitive Procurement Guidelines and the IRP Settlement Agreement.

16. A pre-RFP conference for the 2024 Renewable Energy RFP was held on March 5, 2024 and a pre-RFP conference for the 2025 Energy Storage RFP was held on March 25, 2025, during which RFP documents and scorecard were shared with stakeholders for review and feedback. As a result of the pre-RFP conferences and related correspondence, including with bidders and MPSC Staff, the Company received feedback and incorporated suggestions into the final RFP. DTE Electric appreciates and values feedback from all stakeholders and will continue to leverage learnings to inform and improve future RFP processes.

17. Each of the Projects have been selected as winning bidders in an RFP that meets the guidelines outlined in the Commission-approved competitive bidding guidelines adopted in the September 9, 2021 order in Case No. U-20852, as demonstrated by shortlisted RFP notifications that support the Projects:

- a. Exhibit 1 - the shortlisted RFP notification for the Monroe Storage Project;
- b. Exhibit 2 – the short-listed RFP notification for the Fermi Storage Project; and
- c. Exhibit 3 - the short-listed RFP notification for the Au Gres Solar Park Project.

18. Notably, the Monroe Storage Project and Fermi Storage Project will also support DTE Electric’s share of the statewide energy storage target set forth in Public Act 235 of 2023. DTE Electric’s share of the statewide energy storage target is 1,131.2 MW (Case No. U-25171).

19. To enable DTE Electric to reserve spots in the MISO ERAS inaugural cycle for each of the Projects, the Company is requesting the Commission’s RERRA verifications for each of the Projects by August 6, 2025 or sooner.

20. As explained above, the Projects are consistent with the IRP Settlement Agreement in Case No. U-21193 dated July 26, 2023, meet the MPSC’s competitive procurement guidelines, are consistent with MISO’s ERAS requirements, and supports the Company’s share of the statewide energy storage target in Public Act 235 of 2023, and should therefore be verified by the MPSC for inclusion in the ERAS process. Therefore, DTE Electric respectfully requests that the Commission Staff approve the Company’s request for RERRA verification in order to support a MISO ERAS filing on August 6, 2025.

21. By seeking the Commission’s RERRA verifications for the Projects, the Company is not seeking rate recovery in this filing. Issuing the RERRA verifications will not cause alteration or amendment in DTE Electric rates or rate schedules, nor will the RERRA verifications for the Projects increase the cost of service to DTE Electric customers. Therefore, the relief requested in this Application may be authorized and approved *ex parte* without notice or hearing under MCL 460.6a(3).

**REQUEST FOR RELIEF**

WHEREFORE, for the reasons stated above, DTE Electric respectfully requests that the Michigan Public Service Commission Staff:

- A. Expediently issue RERRA verification letters for each of the Projects (Monroe Storage Project, Fermi Storage Project, and Au Gres Solar Park Project) for inclusion in MISO's ERAS inaugural cycle by August 6, 2025, or sooner;
- B. Determine that the relief requested herein should be granted *ex parte* without the time and expense of a public hearing; and
- C. Grant DTE Electric such other and further relief as is just and reasonable.

Respectfully submitted,

DTE ELECTRIC COMPANY

By: \_\_\_\_\_

Attorneys for Applicant  
Mark W. Madden (P80604)  
Andrea E. Hayden (P71976)  
John A. Janiszewski (P74400)  
One Energy Plaza, 1635 WCB  
Detroit, Michigan 48226  
(313) 235-6205

Dated: August 4, 2025

# **Exhibit 1**



**DTE**

*DTE Electric Company*

08/04/2025

Company: DTE Electric Company  
Sent via *PowerAdvocate*

DTE RFP #230545 DTE Electric 2025 Energy Storage BTA RFP

Dear DTE Electric Company,

Thank you for your participation in DTE Electric's 2025 Energy Storage Build-Transfer Agreement Request for Proposal. The RFP attracted a considerable level of interest and a significant amount of competition within the Michigan development space.

Your proposed project Monroe Energy Center is shortlisted for the 230545 DTE Electric 2025 Energy Storage BTA RFP.

In the meantime, if you have any questions regarding the above, please feel free to contact [clean\\_energy\\_RFP\\_acccount@dteenergy.com](mailto:clean_energy_RFP_acccount@dteenergy.com)

Kind regards,

Erika Williams  
Manager, Clean Energy Competitive Procurement  
DTE Electric Company

## **Exhibit 2**



*DTE Electric Company*

8/04/2025

Company: DTE Electric Company  
Sent via *PowerAdvocate*

DTE RFP #230545 DTE Electric 2025 Energy Storage BTA RFP

Dear DTE Electric Company,

Thank you for your participation in DTE Electric's 2025 Energy Storage Build-Transfer Agreement Request for Proposal. The RFP attracted a considerable level of interest and a significant amount of competition within the Michigan development space.

Your proposed project Fermi Energy Center is shortlisted for the 230545 DTE Electric 2025 Energy Storage BTA RFP pending acceptance into the MISO Expedited Resource Addition Study (ERAS). Although the project's planned COD assumes selection into the MISO ERAS interconnection process, the project was otherwise fully cured.

In the meantime, if you have any questions regarding the above, please contact [clean\\_energy\\_RFP\\_acccount@dteenergy.com](mailto:clean_energy_RFP_acccount@dteenergy.com)

Kind regards,

Erika Williams  
Manager, Clean Energy Competitive Procurement  
DTE Electric Company

## **Exhibit 3**



**DTE**

*DTE Electric Company*

1/27/2025

Company: DTE Energy  
Sent via *PowerAdvocate*

DTE RFP #216450 DTE Electric 2024 Solar BTA RFP

Dear DTE Energy,

Thank you for your participation in DTE Electric's 2024 Solar Build-Transfer Agreement Request for Proposal. The RFP attracted a considerable level of interest and a significant amount of competition within the Michigan development space.

Your proposed project Au Gres is under final consideration for the shortlist for the 216450 DTE Electric 2024 Solar BTA RFP.

In the meantime, if you have any questions regarding the above, please feel free to contact myself and Luisa Dunlap via email: [erin.himmelspach@dteenergy.com](mailto:erin.himmelspach@dteenergy.com) & [luisa.dunlap@dteenergy.com](mailto:luisa.dunlap@dteenergy.com)

Kind regards,

Erin Himmelspach  
Strategist, Renewables Competitive Procurement  
DTE Electric Company

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the Application of **DTE** )  
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\_\_\_\_\_ )

Case No. U-21193

**PROOF OF SERVICE**

STATE OF MICHIGAN )  
 ) ss.  
COUNTY OF WAYNE )

ESTELLA R. BRANSON states that on August 4, 2025, she served a copy of DTE Electric Company's *ex parte* Application and supporting Exhibits 1, 2 and 3, in the above captioned matter, via electronic mail upon the persons listed on the attached service list.

\_\_\_\_\_  
ESTELLA R. BRANSON

**MPSC Case No. U-21193**  
**SERVICE LIST**

**MPSC STAFF**

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