

STATE OF MICHIGAN  
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter, on the Commission's own motion,	)	
to establish a process for addressing the	)	
Midcontinent Independent System Operator, Inc.'s	)	Case No. U-21902
proposed Expedited Resource Addition Study tariff.	)	
_____	)	

At the August 7, 2025 meeting of the Michigan Public Service Commission in Lansing,  
Michigan.

PRESENT: Hon. Daniel C. Scripps, Chair  
Hon. Katherine L. Peretick, Commissioner  
Hon. Shaquila Myers, Commissioner

**ORDER**

Background

On March 17, 2025, the Midcontinent Independent System Operator, Inc. (MISO) filed a request with the Federal Energy Regulatory Commission (FERC) to revise MISO's Open Access Transmission, Energy and Operating Reserve Markets Tariff (tariff), effective May 17, 2025. *See, Midcontinent Independent System Operator, Inc.*, FERC Docket No. ER25-1674-000, Revisions to the Open Access Transmission, Energy and Operating Reserve Tariff Expedited Resource Addition Study Filing (initial MISO filing).<sup>1</sup> MISO sought to amend its generator interconnection procedures (GIP) in order to establish the Expedited Resource Addition Study (ERAS) process. MISO asserted that the ERAS process will provide a framework for the accelerated study of

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<sup>1</sup> The initial MISO filing can be viewed here: [https://cdn.misoenergy.org/2025-03-17\\_Docket%20No.%20ER25-1674-000685943.pdf](https://cdn.misoenergy.org/2025-03-17_Docket%20No.%20ER25-1674-000685943.pdf) (accessed August 4, 2025).

generation projects that can address resource adequacy and reliability needs within the MISO footprint in the near term. Initial MISO filing, pp. 1-2. In proposing the ERAS process, MISO stated that it:

recognizes that Illinois and part of the state of Michigan are the only retail choice jurisdictions in MISO and require a different ERAS process than other jurisdictions. MISO commits to continuing to work with Illinois and Michigan to develop processes and Tariff provisions that will permit the ERAS process to function effectively in retail choice jurisdictions. To that end, once the appropriate processes and Tariff revisions are identified, MISO plans to file a separate Tariff filing for ERAS to address these retail choice jurisdictions.

*Id.*, p. 2. At that time, MISO had not yet proposed a separate tariff for retail choice footprints.

MISO stated that the ERAS process “recognizes that the responsibility for providing grid reliability and resource adequacy in the MISO region is shared by Load Serving Entities (‘LSEs’), the states, and MISO.” *Id.*, pp. 3-4. In order to address resource adequacy and/or reliability needs, MISO explained that projects that enter the ERAS process would be studied serially each quarter and, if they meet the eligibility criteria, would be granted an expedited generator interconnection agreement within 90 days. The proposed ERAS tariff would sunset by the end of 2028. *Id.*, p. 4.

Under the ERAS process proposed in the initial MISO filing, an interconnection customer would have to meet several criteria including demonstrating 100% site control for the interconnection facilities, establishing commercial operation dates that meet specific criteria, making a non-refundable deposit of \$100,000 and a \$24,000 per megawatt milestone payment, and agreeing to pay for all necessary network upgrades per the executed generator interconnection agreement, even if the project is not ultimately built. *Id.*, p. 4. Additionally, the interconnection customer would have to provide a determination from the relevant electric retail regulatory authority (RERRA) verifying that the application should be considered for the ERAS process (RERRA verification). Initial MISO filing, pp. 17-18, 37-38, 125-126, and Attachment X, GIP,

169.0.0. The RERRA is defined as “[a]n entity that has jurisdiction over and establishes prices and/or policies for providers of retail electric service to end-customers, such as the city council for a municipal utility, the governing board of a cooperative utility, the state public utility commission or any other such entity.” Initial MISO filing, pp. 1-2, n. 4 (citing FERC Electric Tariff, Module A, § 1.R (72.0.0)), 70, and Attachment X, GIP, 169.0.0. Thus, if approved, the Commission would be the RERRA for rate-regulated utilities, alternative electric suppliers (AESs), and their associated loads in Michigan.

MISO indicated that the ERAS process would be open to all interconnection customers, including LSEs such as investor-owned utilities (IOUs) and AESs, and also independent power producers (IPPs). Initial MISO filing, pp. 26, 29, and Tab C, Testimony of Andrew Witmeier, pp. 19-25 (Witmeier testimony) (initial MISO filing, pp. 900-906). Mr. Witmeier, the Director of Resource Utilization for MISO, testifies that, as a result of input from interested persons during the development process:

[MISO] recognized that the vast majority of the Interconnection Requests, including those that would be submitted through ERAS, may not be initially submitted by the LSE that ultimately used the resource to serve their load, but rather an Independent Power Producer (“IPP”) that would eventually transfer the resource over to an LSE via an offtake agreement. Given the importance of maintaining the inclusivity and open-access aspects of ERAS, MISO updated the eligibility requirements accordingly to ensure that any project developer can apply to participate in ERAS as long as the project meets all of the ERAS eligibility requirements.

Witmeier testimony, p. 19.

On April 24, 2025, the Commission opened the instant docket in order to address the tariff change requested in the initial MISO filing and to ensure that a review process was in place prior to the then-proposed June 2, 2025 ERAS Quarterly Study Period, should FERC approve MISO’s proposal (April 24 order). *See*, initial MISO filing, p. 2; *see also*, Notice of Intervention and

Limited Protest of Michigan Public Service Commission, April 7, 2025, FERC Docket No. ER25-1674-000. In the April 24 order, the Commission proposed a process for addressing submitted requests for a written notification with recommendation from the Commission as the RERRA, and invited comments on the proposed process. April 24 order, pp. 5-8.

On May 15, 2025, comments were filed by Consumers Energy Company (Consumers); DTE Electric Company, (DTE Electric); International Transmission Company, LLC, d/b/a *ITCTransmission* and Michigan Electric Transmission Company (together, ITC); the Clean Grid Alliance (CGA); the Michigan Energy Innovation Business Council and Advanced Energy United (together, MEIBC/United); and the Natural Resources Defense Council, Earthjustice, Michigan Environmental Center, and the Sierra Club (together, the Public Interest Organizations or PIOs).

On May 16, 2025, FERC issued an order rejecting MISO's proposed ERAS process without prejudice in FERC Docket No. ER25-1674-000, finding that the initial MISO filing was not shown to be just and reasonable and not unduly discriminatory or preferential.<sup>2</sup> 191 FERC ¶ 61,131 (May 16, 2025).

On June 6, 2025, MISO filed an updated ERAS proposal with FERC in FERC Docket No. ER25-2454-000 (revised MISO filing).<sup>3</sup> In the revised MISO filing, MISO stated that it had addressed FERC's concerns (which led to the rejection of the initial proposal) by including a cap on the number of ERAS applications, limiting the number of study cycles, and adding features which ensure that projects identify the load addition and/or the resource adequacy deficiency that

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<sup>2</sup> The order can be viewed here: [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20250516-3074](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20250516-3074) (accessed May 19, 2025).

<sup>3</sup> The revised MISO filing can be viewed here: [https://cdn.misoenergy.org/2025-06-06\\_Docket%20No.%20ER25-2454-000702742.pdf](https://cdn.misoenergy.org/2025-06-06_Docket%20No.%20ER25-2454-000702742.pdf) (accessed June 7, 2025). On June 16, 2025, the Commission filed a notice of intervention and limited protest in FERC Docket No. ER25-2454-000.

the project addresses. Revised MISO filing, pp. 7-10, 24-25; *see id.*, pp. 24-48. The revised MISO filing also added provisions addressing the choice regulatory structure in Michigan. *Id.*, pp. 7, 31, and Tab A Redlines, Attachment X, Section 3.9.1. As MISO described it, the revised MISO filing added a third section to the RERRA language to incorporate Michigan, which now stated that:

if an Interconnection Customer's new Generating Facility will serve a retail choice load then the Interconnection Customer will need to submit demonstration of the resource adequacy deficiency, but will not be required to include a written verification from a RERRA. Rather, MISO will notify the respective RERRA in the retail state that an Interconnection Request was submitted requesting processing in ERAS and will send a copy of the request to the relevant RERRA. The RERRA will then have 10 business days from receipt of the notification from MISO to state that the Interconnection Request should not be considered in the ERAS process.

Revised MISO filing, p. 31 (citing Tab A Redlines, Attachment X, Section 3.9.1). MISO stated that the new language will allow retail choice states to "participate in ERAS." *Id.*, p. 52.

The definition of RERRA remained substantially the same in the revised MISO filing, as did most other provisions of the tariff including the requirement that the interconnection customer pay for all network upgrades whether or not the project is built. *See, id.*, p. 4. However, in the revised MISO filing, MISO updated the language governing the RERRA verification requirements to state the following:

#### 3.9.1 Requirements for Expedited Resource Addition Study.

A request for processing through the Expedited Resource Addition Study made by an Interconnection Customer must meet the requirements listed in Section 3.3.1 above, plus the following requirements:

1. The Interconnection Request shall be accompanied by a written verification from the RERRA (or its documented representative) where the load to be served by the Generating Facility is located, subject to the procedures or methods the RERRA requires, that either:

i. the new, incremental load addition claimed by the Interconnection Customer is valid and not otherwise included in a resource plan or other process under the RERRA's purview.

a. The RERRA (or its documented representative) may provide such written verification in conjunction with another state or municipal agency or official

(e.g. economic development authority or governor's office) to verify the new, incremental load addition above.

or

ii. the Generating Facility proposed by the Interconnection Customer will address a resource adequacy deficiency as determined by the RERRA, State, Load Serving Entity, or Interconnection Customer. The determination can be supported by:

- a. A state energy forecast, or other forward-looking forecast;
- b. Commencement of a state proceeding;
- c. Review of a RERRA, LSE, or other state resource plan or document, which may include, but is not limited to: integrated resource plans, procurement plans, or other plan or study types;
- d. Response to a Request for Proposals (RFP); or
- e. Other process, or delegation of authority, as determined by the RERRA or RERRA regulations (including in retail choice states).

or

iii. If an Interconnection Customer's new Generating Facility will address a resource adequacy deficiency and will either:

(1) serve retail choice load located in a state that limits the amount of load that can select retail choice to a percentage of the electric utility's average weather-adjusted retail sales;

or

(2) serve load in a retail choice state and will be located in a retail choice state other than one that limits the amount of load that can select retail choice to a percentage of the electric utility's average weather adjusted retail sales,

then the Interconnection Customer will indicate the specific load on the Interconnection Request in Section 4.s of Appendix 1 and provide the evidence of determination in (ii) above, but will not be required to include a written verification from a RERRA as described in section 3.9.1(i) or (ii). The Transmission Provider shall notify the respective RERRA that an Interconnection Request for a new Generating Facility has been submitted requesting processing through the Expedited Resource Addition Study process and transmit a copy of the Interconnection Request to the respective RERRA. The RERRA shall have 10 Business Days from the date of the Transmission Provider's notification and the simultaneous transmittal of the copy of the Interconnection Request to notify the Transmission Provider that the Interconnection Request should not be considered in the ERAS process. If no such notice is received at the end of 10 Business Days or if the RERRA notifies the Transmission Provider of its non-opposition prior to the end of the 10 Business Days, the Interconnection Request shall be studied through the Expedited Resource Addition Study process provided it meets the requirements listed in Section 3.3.1 and Section 3.9.2.

A RERRA's written verification is not intended to constitute or provide evidence of any final determination of need or suitability of the project for any purpose by the issuing entity beyond requesting that the Transmission Provider apply the ERAS process for such project.

and

2. An executed agreement evidencing that the projects submitted for ERAS processing is intended to be used by the entity with the claimed resource adequacy and/or reliability need. Such agreement shall take one of the following forms:
  - a. A Load Serving Entity acknowledgement to self-supply;
  - b. A Power Purchase Agreement (PPA) or similar off-take agreement between the Interconnection Customer submitting the project for ERAS consideration and the entity with the load to be served (including, but not limited to, an Alternative Retail Electric Supplier or its Load Serving Entity);
  - c. An agreement that calls for the Interconnection Customer to develop the Generating Facility described in the Interconnection Request and subsequently transfer ownership or control of such Generating Facility (Build-Own-Transfer Agreement) to the entity with the load to be served (including, but not limited to, an Alternative Retail Electric Supplier or its Load Serving Entity); or
  - d. Other agreement between the entity submitting the Interconnection Request, including the RERRA verification letter as appropriate, and the entity with the load to be served (including, but not limited to, an Alternative Retail Electric Supplier or its Load Serving Entity), stating that the ERAS project will be used to meet an identified resource adequacy deficiency. No changes shall be made to the ERAS Interconnection Request after submission.

Revised MISO filing, Tab A Redlines, Attachment X, Section 3.9.1. MISO requested an effective date of August 6, 2025, in order to have the tariff in place for the study cycle which commences September 2, 2025. *Id.*, p. 3. MISO requested that FERC rule on the revised MISO filing by July 22, 2025. *Id.*

In light of the changes to the RERRA verification requirements and the timing of the revised MISO filing, the Commission issued the June 12, 2025 order in this docket (June 12 order), offering another opportunity for comment on the Commission's revised review process. The Commission also invited comment on whether any additional changes were necessitated by the inclusion of the retail choice provisions in the revised MISO filing. June 12 order, pp. 7-10. The Commission proposed the following RERRA review process (with changes from the proposal included in the April 24 order shown in strike/bold):

1. Requests from interconnection customers for inclusion in ERAS may come from entities regulated by the Commission including IOUs and AESs licensed in Michigan, or from an IPP, subject to the restrictions described herein. 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:

- a. Requests received from IOUs: the project is aligned with a Commission-approved IRP [integrated resource plan], clean energy plan, renewable energy plan (REP), or certificate of need (CON), and is the winning bidder of 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. If the Staff determines that the project qualifies for ERAS treatment, the Staff shall issue a letter to the interconnection customer ~~indicating~~ **verifying the resource adequacy need and** that the project is approved by the Commission for inclusion in ERAS and citing to the prior approval of the project by the Commission. No order or minute action will be issued.
- b. Requests received from AESs: the project is aligned with a Commission-approved REP **and/or** with the AES's capacity demonstration filing **that has been accepted by the Staff as containing the necessary supporting documentation as outlined in the most recent Commission-approved capacity demonstration filing guidelines.** ~~and the Staff has reviewed the unredacted signed contract.~~ If the Staff determines that the project qualifies for ERAS treatment, the Staff shall issue a letter to the interconnection customer ~~indicating~~ **verifying the resource adequacy need and** that the project is approved by the Commission for inclusion in ERAS, and citing to the order approving the AES's REP or accepting the AES's capacity demonstration as part of the annual capacity demonstration order. No order or minute action will be issued. **This provision applies to AESs voluntarily seeking written verification from the Commission as the RERRA, however, the Commission acknowledges that a written verification from the RERRA is not required for AESs and IPPs to enter the ERAS process to address resource adequacy deficiencies for retail choice load in Michigan.**
- c. Requests received from IPPs: the project is aligned with a Commission-approved project as outlined in (a) or (b) above. If the Staff determines that the project qualifies for ERAS treatment, the Staff shall issue a letter to the interconnection customer ~~indicating~~ **verifying the resource adequacy need and** that the project is approved by the Commission for inclusion in ERAS, and citing to the prior approval of the associated project from the Commission. No order or minute action will be issued. **This provision applies to IPPs voluntarily seeking written verification from the Commission as the RERRA to serve retail choice load in Michigan, however, the Commission acknowledges that a written verification from the RERRA is not required for AESs and IPPs to enter the ERAS process to address resource adequacy deficiencies for retail choice load in Michigan.**
- d. **Notifications from MISO: when MISO notifies the Commission (as the RERRA) of an interconnection request for inclusion in ERAS within Michigan or to serve load in Michigan, the Staff will review the**

**materials received to determine whether the facility is planning to address a resource adequacy deficiency for the retail choice load in Michigan and that the materials submitted meet MISO's requirements for inclusion in ERAS. If the Staff is unable to make those determinations within the timeframe specified in the MISO tariff, the Staff shall notify MISO that the Commission objects to the interconnection request's inclusion in ERAS.**

2. In instances where the Staff is unable to ~~verify that the project has already received another form of approval from the Commission as specified above,~~ **make the determinations outlined above,** the Staff is directed to issue a letter to the interconnection customer indicating that the Staff is unable to approve the request, **or, if applicable, notify MISO that the Commission objects to the request.** ~~and notifying the interconnection customer that the~~ **In such instances,** the Commission will consider the matter for approval upon the filing of a petition for approval by the interconnection customer. In such cases, the requestor may petition the Commission ~~within 30 days of receipt of the Staff's letter~~ by including the request within an application for an expedited amended IRP, an expedited amended REP, or a CON; or by inclusion with a request to approve a contract that is aligned with a Commission-approved IRP or REP.
3. The Commission acknowledges that AESs are not required to file IRPs and AES contracts are not subject to Commission approval. The Commission will review requests received from IPPs for inclusion in ERAS to meet the resource adequacy needs of ~~AESs~~ **retail choice load** utilizing the Staff's assessments provided in annual capacity demonstration cases, coupled with additional evidence provided by the interconnection customer, if any, detailing the purported resource adequacy or ~~reliability need~~ **deficiency** and the remedies that will be made available through inclusion of the project in ERAS. The Commission may require the Staff to view an unredacted signed contract between the IPP and a Michigan IOU or an AES licensed to serve customers in Michigan, **or an unredacted signed contract between a customer with new load and a Michigan IOU or AES licensed to serve customers in Michigan,** and may require an amended capacity demonstration filing or other information prior to approval for inclusion in ERAS. In such cases, an order or minute action will be issued.

Turning to the interconnection customer's application process to request a written ~~notification~~ **verification** with recommendation from a RERRA, the Commission proposes to consider all applications submitted by interconnection customers for inclusion in ERAS on a case-by-case basis. Under the proposed process, the interconnection customer **shall file the request in the approved or pending associated IRP, REP, CON, or contract approval docket. Interconnection customers with no associated IRP, REP, CON, or contract approval docket shall file the request in Case No. U-21902. The Staff's response shall also be filed in the docket in which the request was filed by the interconnection customer.** ~~may request approval from the Commission by including the request in an associated IRP, amended REP, CON, or contract approval application, or by~~

~~filing the application in a new stand-alone docket.~~ The interconnection customer may request *ex parte* treatment; however, there may be instances when a full contested case may be required, such as an amended IRP case, a CON case, an amended REP case, a contract approval request, or other case as determined by the Commission. The Commission may require amended capacity demonstration filings and may also require the Staff to review unredacted executed contracts or to audit the results of an RFP prior to issuing its approval for inclusion in ERAS.

June 12 order, pp. 7-9. The Commission invited initial and reply comments on (1) the revisions to its proposed review process (noted in strike/bold), and (2) whether additional changes to the proposed review process are recommended to address the inclusion of the retail choice provisions described in the revised MISO filing. Initial comments were due no later than June 26, 2025, and reply comments were due no later than July 11, 2025. The Commission indicated that it would adopt a final procedure in August 2025, should FERC approve MISO's revised ERAS proposal.

June 12 order, p. 10. The Commission stated that the approved procedure would be applicable to interconnection customers wishing to apply during the round of MISO's ERAS process which would take place beginning on September 2, 2025.

On June 26, 2025, initial comments were filed by MEIBC/United and DTE Electric. No reply comments were filed.

On July 21, 2025, FERC approved MISO's revised filing in FERC Docket No. ER25-2454-000, with the condition that MISO make a compliance filing by August 20, 2025, reflecting revised tariff language previously submitted by MISO.<sup>4</sup> *Order Accepting Tariff Revisions, Subject to Condition*, 192 FERC ¶ 61,064 (July 21, 2025) (July 21 FERC order). FERC approved the ERAS tariff effective August 6, 2025. July 21 FERC order, pp. 98, 135.

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<sup>4</sup> The order can be viewed here: [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20250721-3077](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20250721-3077) (accessed July 22, 2025).

All of the comments are briefly described below, followed by the Commission’s discussion of its approved RERRA review procedure.

May 15, 2025 Comments

Consumers comments that the requirement that a project win a competitive RFP may limit the efficacy of the ERAS process by excluding bilateral agreements. Consumers’ comments, p. 2. Consumers indicates that it expects to pursue bilateral agreements to meet resource adequacy needs, which is contemplated by MCL 460.1028(6). Second, Consumers comments that the Commission’s process should include a well-defined timeline for the Staff to follow such as 15 or 30 days from the application date for approval or denial. Consumers urges the Commission to set clear timeframes for each type of review. Third, Consumers comments that, for projects where the Staff is unable to verify that the project has already received Commission approval, the Commission should open up the possibility for approval of power supply agreements under Public Act 304 of 1982, as amended. Consumers’ comments, p. 4.

DTE Electric comments that MISO’s ERAS proposal is vital to addressing the projected capacity shortfalls expected for Michigan, and DTE Electric “supports the establishment of qualification criteria and delegation of approval authority to the Staff.” DTE Electric’s comments, p. 3. To address the need for urgency, DTE Electric argues that the Commission’s process should be modified to make clear that an actual order in an IRP, REP, CON, or clean energy plan (CEP) is not required, but that the commencement of such a proceeding, along with the project being a winning bidder of an RFP, is sufficient to show that the project is suitable for inclusion in the ERAS process. *Id.*, p. 4. DTE Electric contends that MISO’s proposed language confirms that the ERAS findings do not constitute evidence that the project is reasonable and prudent or approved

for cost recovery. DTE Electric uses the example of a project named in all-source RFP that is included in a commenced IRP application.

ITC comments that the ERAS proposal is a worthwhile project and the company supports the proposal as a vehicle for meeting increased demand. ITC's comments, p. 4.

While noting that it opposes the ERAS proposal as unjust and fundamentally anti-competitive, CGA urges the Commission to develop a process by which IPP projects that have not won an RFP and/or have not executed a PPA with an IOU or AES may still qualify for ERAS treatment. CGA's comments, p. 3. CGA comments that IPPs should be allowed to participate independent of a connection to an IOU or AES and that the Commission could review the project according to its own standards, including competitive standards. CGA argues that the proposed process shows favoritism to IOUs and AESs. CGA also comments that the process should be open and transparent, and, to that end, the Commission should publish its eligibility criteria and develop standardized evaluation criteria, which should include a requirement that the project help the state meet its clean energy goals and a requirement that there be no project already in the queue that could meet the same near-term resource adequacy need. *Id.*, pp. 4-5.

CGA also comments that the Commission should prioritize projects that are already waiting in the MISO interconnection queue and should "seek to minimize harm to existing interconnection customers[.]" *Id.*, p. 5. CGA comments that the Commission should make clear how its process can be accessed by interested persons and how they could participate in the review, which should be filed in a new docket and provide for input from interested persons. CGA comments that it is currently unclear to what extent interested persons may engage in the process, but adds that *ex parte* treatment should be disallowed.

The PIOs also oppose MISO’s ERAS proposal as unjust and unduly discriminatory. PIO’s comments, p. 1 (applying natural pagination). The PIOs comment that the Commission should clarify that it will require applicants to meet the MISO requirements, and should also require that the project be ready to be online (has a COD) within three years of the ERAS application date. *Id.*, pp. 3-4. The PIOs also comment that the Commission should require additional evidence that the project will meet a near-term resource adequacy need, such as through inclusion in the utility’s capacity demonstration filing. The PIOs add that the Commission should require that the project help ensure compliance with the state’s clean energy goals. The PIOs request that the Commission clarify when and how interested persons will have input into the Commission’s review process, arguing that public review and input is essential. *Id.*, p. 6. The PIOs also urge the Commission to adopt more specific and detailed timelines.

MEIBC/United comment that a robust and fair state implementation process could help to counterbalance the discriminatory aspects of MISO’s proposed ERAS process. MEIBC/United’s comments, p. 7. MEIBC/United comment that the Commission’s process should consider different ownership models for generation projects, including third-party-owned generation projects, which MEIBC/United assert are more cost effective for ratepayers than IOU-owned projects. MEIBC/United add that a “strong third-party market will provide competitive prices” and will ensure that IOU-owned projects are not provided with an undue advantage. *Id.*, p. 8. MEIBC/United comment that data access advantages could allow a utility to dominate a first-come-first-served process. MEIBC/United comment that the Commission should urge MISO to consider projects that are already in the interconnection queue before considering projects that are not in the queue in order to ensure that projects already in the queue are not disadvantaged. MEIBC/United further state that the Commission should provide for the involvement of interested

persons in the ERAS review process, allow for public input, and make its decisions via a public action. MEIBC/United add that applicants should be required “to submit information pertaining to the docket in which the applicant received prior approval to construct a project as well as the ownership model of the respective project.” *Id.*, p. 10. MEIBC/United comment that this information will allow parties to track the diversity of ownership types represented among applicants pursuing an ERAS recommendation from the RERRA. MEIBC/United state that if the Staff is unable to verify whether a project has received prior Commission approval, the application should be rejected. Finally, MEIBC/United comment that the Commission should require a COD that is within three years of the applicable ERAS cycle and should require additional evidence of need fulfillment such as proof of a connection with “new large load (such as data centers) to demonstrate that there is a near-term resource adequacy need that the project would meet.” *Id.*, p. 12.

#### June 26, 2025 Initial Comments

In their initial comments, MEIBC/United state that the Commission’s proposed process does not detail the exact method by which the Staff will verify that a resource adequacy need will be met by the project, and they comment that this should be done in a clear and transparent way. MEIBC/United’s initial comments, pp. 4-5. MEIBC/United further state that, currently, the extent and content of the information that will be provided by MISO to the Commission is unknown and they recommend that the Commission “have future conversations with MISO on this topic.” *Id.*, p. 6. Finally, MEIBC/United comment that the proposed process allows ERAS requests to be filed in multiple dockets, and that this will be administratively burdensome and difficult to track for both the Staff and interested persons. They recommend that the Staff file a quarterly report in the

instant docket describing the “total number of ERAS requests received by the Commission and the specific dockets where the requests reside.” *Id.*

In its initial comments, DTE Electric states that it continues to support the delegation of ERAS approval authority to the Staff. However, the company comments that the approval criteria should be changed. DTE Electric states that the requirement that the IRP, REP, CEP, or CON be completed is “overly restrictive and does not address the urgency of the moment given the expected resource needs and the time needed for regulatory filings to unfold.” DTE Electric’s initial comments, p. 2. The company recommends that this criterion be satisfied by the commencement of such a proceeding (along with the requirement that the applicant is the winning bidder of an RFP). DTE Electric states that waiting for a final order in such a proceeding may take more than a year.

Noting that special contracts should be considered, DTE Electric further comments that the approval process should include a provision for customer-requested projects that are sponsored by IOUs, stating that “such a case may arise where new spot loads arrive in an IOU’s territory, but they are not part of any [IRP, REP, CEP, or CON].” *Id.*, p. 3.

Lastly, DTE Electric comments that IOUs should be able to request *ex parte* treatment for their applications without the possibility of a contested case, because contested cases will cause too much delay. The company contends that the applicant must be sure of *ex parte* treatment because the “limited run of projects included in MISO’s ERAS proposal will likely be exhausted in quick fashion” and Michigan should be able to compete for these spots. *Id.*, p. 4. DTE Electric suggests some additional minor revisions to the proposed process for clarity.

## Discussion

The Commission thanks the participants for their insightful and thorough comments.

The Commission begins by noting FERC’s finding that the “RERRA verification requirement provides the necessary flexibility to recognize the different regulatory review processes across the states and RERRAs in the MISO region.” July 21 FERC order, pp. 93-94 (footnote omitted).

FERC goes on to state that:

it is reasonable and appropriate for MISO to allow RERRAs to determine which projects should be selected for ERAS, and to implement their own processes for making such determinations, as this approach strikes a reasonable balance between state authority over resource procurement and [FERC] authority over generation interconnecting to the interstate transmission system. Accordingly, we find that it is not necessary for MISO to establish scoring criteria or a ranking process for proposed ERAS projects, as protesters suggest.

July 21 FERC order, p. 94. FERC further finds that RERRAs “are uniquely positioned to evaluate the needs in their regions” and that:

studying an interconnection request through the ERAS process does not pre-determine the outcome of an ERAS interconnection request, as any project must still obtain state approval through the state’s corresponding regulatory review process. As several commenters explain, the RERRA verification process balances MISO’s need to verify projects that meet resource adequacy needs and the RERRAs’ need to not prejudge generation certifications.

*Id.* (footnotes omitted).

With this context in mind, the Commission begins with the comments aimed at expanding ERAS consideration to projects that are not aligned with any approved IRP, REP, CEP, or CON. The Commission is not persuaded to allow this expansion. The ERAS process is intended to be a stopgap measure that will allow projects associated with a proven need to proceed to construction more quickly. This goal does not justify abandoning the planning process that the Commission oversees pursuant to Public Act 341 of 2016 (Act 341). Furthermore, Act 341 provides for the submission of amended plans and the Commission expects utilities to file amended plans for consideration when the assumptions or expectations underpinning approved IRPs have materially changed, such as projected double-digit percentage demand growth increases between IRP

applications. Further, while the Commission does not intend to prioritize any particular project in the RERRA review process, the Commission observes that the existing RFP process requires the project to be in the interconnection queue; thus, the Commission encourages applicants for a RERRA verification to consider projects that are already in the queue for ERAS treatment. For applicants who wish to receive a RERRA verification from the Staff, the Commission will require those applicants to document their connection to a resource need that has already been demonstrated in any of the four eligible proceedings.<sup>5</sup>

For the same reason, the Commission declines to expand ERAS consideration to projects that are not associated with a final order but instead have a connection to a pending proceeding, with the single exception that is discussed below. The Commission finds that adjudication of the resource need is necessary, in most cases, to satisfy both the ERAS criteria and Michigan's statutory scheme. The ERAS tariff requires the RERRA to find either that the project "will address a resource adequacy deficiency" or that "the new, incremental load . . . is valid." Revised MISO filing, Tab A Redlines, Attachment X, Section 3.9.1; *see also*, July 21 FERC order, p. 93. Under Michigan law, the mechanism for addressing whether a utility will meet its resource adequacy needs is through an IRP approved by the Commission under MCL 460.6t as "represent[ing] the most reasonable and prudent means of meeting the electric utility's energy and capacity needs," including consideration of "[r]esource adequacy and capacity to serve anticipated peak electric load, applicable planning reserve margin, and local clearing requirement," among other statutory factors. MCL 460.6t(8)(a)(1). Nothing in the ERAS proposal obviates the need for a utility to demonstrate that a project proposed for consideration under ERAS meets this statutory requirement. Further, while MCL 460.6t(19) explicitly allows an electric utility to amend an

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<sup>5</sup> The Commission notes that it has added CEPs to the eligible proceedings for AESs.

approved IRP, the Commission observes that it has received no requests to amend existing IRPs to accommodate loads such as data centers despite the fact that this issue entered the national discussion well over a year ago. Finally, the Commission also observes that, under the ERAS tariff, the interconnection network upgrade costs must be borne by the interconnection customer whether or not the project is actually built. The Commission is committed to ensuring that there is no risk that such costs will ultimately fall on ratepayers if the project receives a verification from the RERRA and enters the ERAS process but is not ultimately approved on the merits in a proceeding before the Commission.

In light of these same concerns, the Commission has amended its RERRA review process to remove the reference to “expedited” processes, finding that the decisions that must be made in proceedings to grant or amend an IRP, REP, or CON do not lend themselves to expedited review but rather form part of the careful planning structure enacted with Act 341 (some of these proceedings are already subject to challenging timelines).

However, on the issue of expansion, the Commission finds it to be reasonable to consider projects based on bilateral agreements or special contracts, or that are RFP winners under an IRP but do not yet have a final order in a pending *ex parte* proceeding addressing the contract. Such projects must file their ERAS applications directly with the Commission rather than the Staff, and will be considered for a RERRA verification on a case-by-case basis. Applicants should be aware that such projects will be required to have an application pending before the Commission. The applicant must be able to show that the project is consistent with an approved IRP.

On the subject of transparency, the Commission has amended the RERRA review process to require that all applications for a RERRA verification be filed in Case No. U-21902 as well as in the corresponding IRP, REP, CEP, or CON docket. In this way, all interested persons will be

made aware of all ERAS filings simply by following the instant docket. Thus, the Commission does not find that quarterly reports by the Staff are necessary. The Commission is not persuaded to remove the option of *ex parte* treatment or to remove the option of a contested case. The Commission finds that the procedural options presented in its proposed RERRA review process are adequate and protect the interests of both utilities and ratepayers. Finally, on transparency, the Commission provides numerous existing avenues for participation in Commission matters.<sup>6</sup>

The Commission adopts the suggestion that the interconnection customer should demonstrate its compliance with the ERAS requirements, and the amended review process reflects this change. The Commission also agrees that the project's COD should be within three years of the request for the RERRA verification, and that a description of the ownership model must be provided with the application. The Commission finds that, with these changes, its process provides sufficient standardization and a strict timeline is not necessary. The process continues to require the Staff to act on requests expeditiously, and the Staff is mindful of the short timeframe embedded in the ERAS process. The Commission does not find that a requirement that the project demonstrate that it will assist in meeting the state's clean energy goals is necessary for the RERRA verification, in light of the Commission's requirement that the project align with an approved IRP, REP, CEP, or CON. Opportunities to meet with the Staff will be left to the discretion of the Staff.

Finally, on the issue of the associated costs, the Commission notes that the ERAS tariff states that "[a] RERRA's written verification is not intended to constitute or provide evidence of any final determination of need or suitability of the project for any purpose by the issuing entity beyond requesting that the Transmission Provider apply the ERAS process for such project." Revised MISO filing, p. 29, and Tab A Redlines, Attachment X, Section 3.9.1. Likewise, FERC

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<sup>6</sup> See, <https://www.michigan.gov/mpsc/consumer/get-involved> (accessed August 4, 2025).

notes that “the RERRA verification requirement is not intended to constitute a final determination on the need or suitability of the interconnection request. Rather, MISO emphasizes that the RERRA verification is only a condition for requesting that MISO study a proposed interconnection request in the ERAS process.” July 21 FERC order, p. 54. The Commission emphasizes that the RERRA verification has no relevance to the issue of cost recovery, including interconnection costs, transmission costs, or any other costs associated with the project seeking ERAS treatment. The RERRA verification does not constitute an approval or a presumption of approval for any project and does not constitute a finding on the underlying merits of any project seeking ERAS treatment. Should an LSE present its RERRA verification in a proceeding addressing the merits of the associated contract (such as a proceeding seeking approval of the contract) or a proceeding addressing cost recovery (such as a rate case), the ERAS tariff makes clear that such evidence is of no relevance to the issues presented.

With these decisions, the Commission adopts the following RERRA review process:

1. Requests from interconnection customers for inclusion in ERAS may come from entities regulated by the Commission including IOUs and AESs licensed in Michigan, or from an IPP, subject to the restrictions described herein. All requests to the Commission from interconnection customers for inclusion in ERAS should:
  - a. Copies of documentation that have been, or will be, provided to MISO by the interconnection customer demonstrating the requirements outlined in MISO’s Tariff Attachment X, effective August 6, 2025, Section 3.3 Valid Interconnection Request and Section 3.9.1 Requirements for Expedited Resource Addition Study and may include, but are not limited to, the following:
    - i. An executed off-take agreement with new load. For example, a contract to serve a new customer.
    - ii. Proof of near-term need, which may include load forecasts, capacity assessments, or any other relevant information that clearly indicates the necessity of the interconnection to maintain resource adequacy and includes the specific geographic location of the need.
    - iii. The expected peak demand for electricity over any one-hour period in megawatts (MW) for the new load within three years from the date of ERAS application, and over the next 10 years.

- iv. The amount of interconnection service requested for the interconnecting resource.
  - v. Documentation supporting a commercial operation date of no more than 3 years from the ERAS application date.
  - vi. Documentation demonstrating 100% site control excluding financial security as a method to demonstrate site control.
- b. Documentation verifying prior Commission approval of the project or documentation indicating where the request for Commission approval of the project is pending.
  - c. Documentation naming the entities that will own and operate the interconnecting resource.
  - d. Documentation outlining how the interconnecting resource aligns with existing Michigan statutes, including planned compliance with the renewable energy standard, clean energy standard, and the statewide storage target.
2. The Commission delegates its authority as the RERRA to the Commission's Chief Operating Officer (COO) (or the COO's designee) and directs the Commission Staff (Staff) to approve requests on behalf of the Commission that meet the following specific criteria in an expeditious manner:
- a. Requests received from IOUs:
    - i. The project is aligned with a Commission-approved integrated resource plan (IRP), clean energy plan (CEP), renewable energy plan (REP), or certificate of need (CON), and is the winning bidder of a request for proposal (RFP) that meets the guidelines outlined in the most recent version of the Commission-approved competitive bidding guidelines initially adopted in the September 9, 2021 order in Case No. U-20852, and the Staff has completed its audit of the RFP results. If the Staff determines that the project qualifies for ERAS treatment, the Staff shall issue a letter to the interconnection customer indicating that it has verified the resource adequacy need and that the project is approved by the Commission for inclusion in ERAS. The Staff shall cite the aligned Commission-approved IRP, CEP, REP, or CON and indicate that it has completed its audit of the RFP results. If the project has already received additional regulatory approvals from the Commission, such as the approval of an executed contract, the Staff shall also cite such approvals in its response.
    - ii. The project is aligned with a Commission-approved IRP, CEP, REP, or CON, and is accompanied by a long-term executed bilateral agreement or an executed special contract. If the Staff determines that the project qualifies for ERAS treatment, the Staff shall issue a letter to the interconnection customer indicating that it has verified the resource adequacy need and that the project is approved by the Commission for inclusion in ERAS. The Staff shall cite the aligned Commission-approved IRP, CEP, REP, or CON and indicate that it has completed its audit of the RFP results. If the project has already

received additional regulatory approvals from the Commission, such as the approval of the bilateral agreement or special contract, the Staff shall also cite such approvals in its response.

No order or minute action will be issued. The Staff shall file a copy of its letter to the interconnection customer in Case No. U-21902.

- b. Requests received from AESs: the project is aligned with a Commission-approved REP, CEP, and/or with the AES's capacity demonstration filing that has been accepted by the Staff as containing the necessary supporting documentation as outlined in the most recent Commission-approved capacity demonstration filing guidelines, and the Staff has reviewed the unredacted signed contract. If the Staff determines that the project qualifies for ERAS treatment, the Staff shall issue a letter to the interconnection customer indicating that it has verified the resource adequacy need and that the project is approved by the Commission for inclusion in ERAS, and citing to the approval of the AES's REP or receipt of the AES's capacity demonstration as part of the annual capacity demonstration process. No order or minute action will be issued. This provision applies to AESs voluntarily seeking written verification from the Commission as the RERRA; however, the Commission acknowledges that a written verification from the RERRA is not required for AESs and IPPs to enter the ERAS process to address resource adequacy deficiencies for retail choice load in Michigan.
- c. Requests received from IPPs: the project is aligned with a Commission-approved plan to serve Michigan load and meets the requirements outlined in (a) or (b) above. If the Staff determines that the project qualifies for ERAS treatment, the Staff shall issue a letter to the interconnection customer indicating that it has verified the resource adequacy need and that the project is approved by the Commission for inclusion in ERAS and citing to the aligned Commission-approved plan and other applicable regulatory approvals. No order or minute action will be issued. This provision applies to IPPs voluntarily seeking written verification from the Commission as the RERRA to serve load in Michigan; however, the Commission acknowledges that a written verification from the RERRA is not required for AESs and IPPs to enter the ERAS process to address resource adequacy deficiencies for retail choice load in Michigan.
- d. Notifications from MISO: when MISO notifies the Commission (as the RERRA) of an interconnection request for inclusion in ERAS within Michigan or to serve load in Michigan, the Staff will review the materials received to determine whether the facility is planning to address a resource adequacy need for the retail choice load in Michigan and that the materials submitted meet MISO's requirements for inclusion in ERAS. If the Staff is unable to make those determinations within the timeframe specified in the MISO tariff, the Staff shall notify MISO that the Commission objects to the interconnection request's inclusion in ERAS.

3. In instances where the Staff is unable to make the determinations outlined above, the Staff is directed to issue a letter to the interconnection customer indicating that the Staff is unable to approve the request, or, if applicable, notify MISO that the Commission objects to the request, and file a copy of the letter in this docket. In such instances, the Commission will consider the matter for approval upon the filing of a petition for approval by the interconnection customer. In such cases, the requestor may petition the Commission by including the request within an application for an amended IRP, an amended REP, an amended CEP, or a CON; or by inclusion with a request to approve a contract that is aligned with a pending or approved IRP, CEP, or REP. Determinations in these matters will be made by the Commission in Commission orders.
4. The Commission acknowledges that AESs are not required to file IRPs and AES contracts are not subject to Commission approval. The Commission will review requests received from IPPs for inclusion in ERAS to meet the resource adequacy needs of retail choice load utilizing the Staff's assessments provided in annual capacity demonstration cases, coupled with additional evidence provided by the interconnection customer, if any, detailing the purported resource adequacy need and the remedies that will be made available through inclusion of the project in ERAS. The Commission may require the Staff to view an unredacted signed contract between the IPP and a Michigan IOU or an AES licensed to serve customers in Michigan, or an unredacted signed contract between a customer with new load and a Michigan IOU or AES licensed to serve customers in Michigan, and may require an amended capacity demonstration filing or other information prior to approval for inclusion in ERAS. In such cases, an order or minute action will be issued.
5. The Commission shall consider all applications submitted by interconnection customers for inclusion in ERAS on a case-by-case basis. The interconnection customer shall file the request in the approved or pending associated IRP, CEP, REP, CON, or contract approval docket, and in Case No. U-21902. Interconnection customers with no associated IRP, CEP, REP, CON, or contract approval docket shall file the request in Case No. U-21902. The Staff's response shall also be filed in the docket(s) in which the request was filed by the interconnection customer. The interconnection customer may request *ex parte* treatment; however, there may be instances when a full contested case may be required, such as an amended IRP case, a CON case, an amended REP case, a contract approval request, or other case as determined by the Commission. The Commission may require amended capacity demonstration filings and may also require the Staff to review unredacted executed contracts or to audit the results of an RFP prior to issuing its approval for inclusion in ERAS.

The Commission will begin accepting applications for ERAS consideration under the described process with the issuance of this order.

THEREFORE, IT IS ORDERED that the process for addressing requests filed pursuant to the Midcontinent Independent System Operator, Inc.'s Expedited Resource Addition Study tariff described in this order is approved.

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](mailto:LARA-MPSC-Edockets@michigan.gov) and to the Michigan Department of Attorney General - Public Service Division at [sheacl@michigan.gov](mailto: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

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Daniel C. Scripps, Chair

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Katherine L. Peretick, Commissioner

I abstain.

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Shaquila Myers, Commissioner

By its action of August 7, 2025.

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Lisa Felice, Executive Secretary

# PROOF OF SERVICE

STATE OF MICHIGAN )

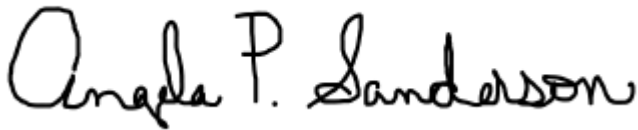
Case No. U-21902

County of Ingham )

Brianna Brown being duly sworn, deposes and says that on August 7, 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 7<sup>th</sup> day of August 2025.



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

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<a href="mailto:lrgustafson@CMSENERGY.COM">lrgustafson@CMSENERGY.COM</a>	Gustafson, Lisa
<a href="mailto:jhammel@hillsdalebpu.com">jhammel@hillsdalebpu.com</a>	Hillsdale Board of Public Utilities
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<a href="mailto:suzy@megautilities.org">suzy@megautilities.org</a>	MEGA
<a href="mailto:dan@megautilities.org">dan@megautilities.org</a>	MEGA
<a href="mailto:mmann@USGANDE.COM">mmann@USGANDE.COM</a>	Michigan Gas & Electric
<a href="mailto:VSTRetailReg@VistraCorp.com">VSTRetailReg@VistraCorp.com</a>	Michigan Gas & Electric (US Gas & Electric)
<a href="mailto:shannon.burzycki@wecenergygroup.com">shannon.burzycki@wecenergygroup.com</a>	Michigan Gas Utilities Corporation
<a href="mailto:mrzwiars@INTEGRYSGROUP.COM">mrzwiars@INTEGRYSGROUP.COM</a>	Michigan Gas Utilities/Upper Penn Power/Wisconsin
<a href="mailto:kabraham@mpower.org">kabraham@mpower.org</a>	Michigan Public Power Agency
<a href="mailto:info@michigannaturalgasllc.com">info@michigannaturalgasllc.com</a>	Michigan Natural Gas, LLC
<a href="mailto:JHDillavou@midamericanenergyservices.com">JHDillavou@midamericanenergyservices.com</a>	MidAmerican Energy Services, LLC
<a href="mailto:JCAltmayer@midamericanenergyservices.com">JCAltmayer@midamericanenergyservices.com</a>	MidAmerican Energy Services, LLC
<a href="mailto:LMLann@midamericanenergyservices.com">LMLann@midamericanenergyservices.com</a>	MidAmerican Energy Services, LLC
<a href="mailto:manderson@wpsci.com">manderson@wpsci.com</a>	Midwest Energy
<a href="mailto:mengels@wpsci.com">mengels@wpsci.com</a>	Midwest Energy
<a href="mailto:cdrys@wpsci.com">cdrys@wpsci.com</a>	Midwest Energy
<a href="mailto:ljohnson@wpsci.com">ljohnson@wpsci.com</a>	Midwest Energy
<a href="mailto:dave.allen@TEAMMIDWEST.COM">dave.allen@TEAMMIDWEST.COM</a>	Midwest Energy Cooperative
<a href="mailto:terry.rubenthaler@teammidwest.com">terry.rubenthaler@teammidwest.com</a>	Midwest Energy Cooperative
<a href="mailto:kerri.wade@teammidwest.com">kerri.wade@teammidwest.com</a>	Midwest Energy Cooperative
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<a href="mailto:d.motley@COMCAST.NET">d.motley@COMCAST.NET</a>	Motley, Doug
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<a href="mailto:sarah.m.fraze@xcelenergy.com">sarah.m.fraze@xcelenergy.com</a>	Northern States Xcel
<a href="mailto:kbeattie@ntherm.com">kbeattie@ntherm.com</a>	nTherm, LLC
<a href="mailto:daho@ontorea.com">daho@ontorea.com</a>	Ontonagon County Rural
<a href="mailto:esoumis@ontorea.com">esoumis@ontorea.com</a>	Ontonagon County Rural Electric
<a href="mailto:regulatory@indraenergy.com">regulatory@indraenergy.com</a>	PALMco Energy MI, LLC d/b/a Indra Energy
<a href="mailto:mpauley@GRANGER.NET">mpauley@GRANGER.NET</a>	Pauley, Marc
<a href="mailto:mmpeck@fischerfranklin.com">mmpeck@fischerfranklin.com</a>	Peck, Matthew
<a href="mailto:bschlansker@PREMIERENERGYLLC.COM">bschlansker@PREMIERENERGYLLC.COM</a>	Premier Energy Marketing LLC
<a href="mailto:manderson@wpsci.com">manderson@wpsci.com</a>	Presque Isle

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[aberg@pieg.com](mailto:aberg@pieg.com)  
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[johnbistranin@realgy.com](mailto:johnbistranin@realgy.com)  
[BusinessOffice@REALGY.COM](mailto:BusinessOffice@REALGY.COM)  
[akeilson@genieretail.com](mailto:akeilson@genieretail.com)  
[btrombino@rpaenergy.com](mailto:btrombino@rpaenergy.com)  
[mvorabout@ses4energy.com](mailto:mvorabout@ses4energy.com)  
[rabaey@SES4ENERGY.COM](mailto:rabaey@SES4ENERGY.COM)  
[ttynes@ses4energy.com](mailto:ttynes@ses4energy.com)  
[trish.mcfadin@southstarenergy.com](mailto:trish.mcfadin@southstarenergy.com)  
[kejoseph@sparkenergy.com](mailto:kejoseph@sparkenergy.com)  
[cborr@WPSCI.COM](mailto:cborr@WPSCI.COM)

[jbelec@stephenson-mi.org](mailto:jbelec@stephenson-mi.org)  
[kay8643990@YAHOO.COM](mailto:kay8643990@YAHOO.COM)  
[legal@symmetryenergy.com](mailto:legal@symmetryenergy.com)  
[regulatory@texasretailenergy.com](mailto:regulatory@texasretailenergy.com)  
[agilbert@cleanskyenergy.com](mailto:agilbert@cleanskyenergy.com)  
[bessenmacher@tecni.coop](mailto:bessenmacher@tecni.coop)  
[president@tomorrowenergy.com](mailto:president@tomorrowenergy.com)  
[manderson@wpsci.com](mailto:manderson@wpsci.com)  
[mengels@wpsci.com](mailto:mengels@wpsci.com)  
[cdrys@wpsci.com](mailto:cdrys@wpsci.com)  
[ljohnson@wpsci.com](mailto:ljohnson@wpsci.com)  
[mlindsay@uetllc.com](mailto:mlindsay@uetllc.com)  
[colleen.sipiorski@wecenergygroup.com](mailto:colleen.sipiorski@wecenergygroup.com)  
[djmier@integrysgroup.com](mailto:djmier@integrysgroup.com)  
[James.Beyer@wecenergygroup.com](mailto:James.Beyer@wecenergygroup.com)  
[Richard.Stasik@wecenergygroup.com](mailto:Richard.Stasik@wecenergygroup.com)  
[nbell@upppo.com](mailto:nbell@upppo.com)  
[jformol@upppo.com](mailto:jformol@upppo.com)  
[ghaehnel@upppo.com](mailto:ghaehnel@upppo.com)  
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[manager@villageofbaraga.org](mailto:manager@villageofbaraga.org)  
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[VSTRetailReg@VistraCorp.com](mailto:VSTRetailReg@VistraCorp.com)  
[jeinstein@volunteerenergy.com](mailto:jeinstein@volunteerenergy.com)  
[leew@WVPA.COM](mailto:leew@WVPA.COM)  
[melissa.schauer@wecenergygroup.com](mailto:melissa.schauer@wecenergygroup.com)  
[andrew.miller1@wecenergygroup.com](mailto:andrew.miller1@wecenergygroup.com)  
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[andrew.miller1@wecenergygroup.com](mailto:andrew.miller1@wecenergygroup.com)

[tking@WPSCI.COM](mailto:tking@WPSCI.COM)

[jbaumann@wpsci.com](mailto:jbaumann@wpsci.com)

[cborr@wpsci.com](mailto:cborr@wpsci.com)

[ddecouer@wpsci.com](mailto:ddecouer@wpsci.com)

[bvalice@wpsci.com](mailto:bvalice@wpsci.com)

[Amanda@misostates.org](mailto:Amanda@misostates.org)

[Deborah.e.erwin@xcelenergy.com](mailto:Deborah.e.erwin@xcelenergy.com)

[Michelle.Schlosser@xcelenergy.com](mailto:Michelle.Schlosser@xcelenergy.com)

[bryce.mckenney@nrg.com](mailto:bryce.mckenney@nrg.com)

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