

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter, on the Commission’s own motion,)	
to open a docket for load serving entities in)	
Michigan to file their capacity demonstrations for)	Case No. U-21775
the 2028/2029 planning year as required by)	
MCL 460.6w.)	
_____)	

In the matter, on the Commission’s own motion,)	
to open a docket for load serving entities in)	
Michigan to file their capacity demonstrations for)	Case No. U-21907
the 2029/2030 planning year as required by)	
MCL 460.6w.)	
_____)	

At the August 21, 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 and Procedural History

Public Act 3 of 1939, as amended by Public Act 341 of 2016 (Act 341), MCL 460.6w(8) (Section 6w(8)), requires each electric utility, alternative electric supplier (AES), cooperative electric utility, and municipally owned electric utility to demonstrate to the Commission, in a format determined by the Commission, that each load serving entity (LSE) owns or has contractual rights to sufficient capacity to meet its capacity obligations as set by the appropriate

independent system operator (ISO), or the Commission, as applicable.¹ This is known as a state reliability mechanism (SRM) capacity demonstration.

Act 341 states that regulated electric utilities' capacity demonstration filings are due by December 1 each year, with filings by AESs, cooperatives, and municipally owned electric utilities due by the seventh business day in February each year. MCL 460.6w(8)(a)-(b). However, the statute also allows the Commission to adjust these dates to ensure proper alignment with the ISO's procedures and requirements. MCL 460.6w(10). In the September 15, 2017 order in Case No. U-18197 (September 15 order), the Commission adopted a format for the capacity demonstration filings required by Section 6w(8), including templates for reporting and for affidavits.² Each year, the Commission opens a docket for the purpose of receiving those filings, and sets due dates for the filings and for the Commission Staff's (Staff's) report providing an analysis of the sufficiency of each LSE's capacity demonstration.

In the August 22, 2024 order in Case Nos. U-21393 *et al.* (August 22 order), the Commission opened the docket in Case No. U-21775 for the purpose of receiving the LSEs'

¹ MCL 460.6w(12)(a) defines the appropriate ISO as the Midcontinent Independent System Operator, Inc. (MISO). MCL 460.6w(11) also states that "[n]othing in this act shall prevent the commission from determining a generation capacity charge under the reliability assurance agreement, rate schedule FERC [Federal Energy Regulatory Commission] No. 44 of the independent system operator known as PJM Interconnection, LLC [PJM]. . . ."

² The filing requirements have been slightly modified in the intervening years. *See*, September 13, 2018 order in Case No. U-20154. In the March 17, 2019 order in Case No. U-20154, the Commission also approved a protective order for use with capacity demonstration filings. That protective order may also be used in Case No. U-21907 for the 2029/2030 capacity demonstration.

capacity demonstrations for the 2028/2029 planning year (PY).³ In response to a shift to a seasonal capacity auction and other developments at MISO, the Commission adjusted the capacity demonstration filing dates as permitted under Section 6w(10) and directed larger investor-owned utilities (IOUs)⁴ to file by February 24, 2025; smaller IOUs to file by March 3, 2025; and AESs, cooperatives, and municipally owned utilities to file by March 17, 2025. The Commission also directed the Staff to file its analysis of the demonstrations no later than May 12, 2025.

On February 27, 2025, the Commission issued an order in Case Nos. U-21393 *et al.* (February 27 order) granting a motion for clarification filed by Energy Michigan regarding the requirements applicable to the capacity demonstrations filed by AESs pursuant to Section 6w(8)(b). In the February 27 order, the Commission clarified the wording in the Capacity Demonstration Process and Requirements document and General Affidavit to align with its previously expressed interpretation that Section 6w's four-year forward capacity demonstration requirement does not prevent an LSE from entering into other capacity agreements or contracts outside of the original capacity contract after the LSE has made its capacity obligation. Specifically, the Commission revised the language in the Capacity Demonstration Process and Requirements document and General Affidavit to read, "commitment

³ MCL 460.6w(8)(a) states that if an SRM is to be established, the Commission shall require, among other things, each electric utility to demonstrate by December 1 of each year that "for the planning year beginning 4 years after the beginning of the current planning year" that the utility owns or has contractual rights to sufficient capacity to meet its load obligations. Thus, the statute requires the capacity demonstrations to be four years out after the year the capacity demonstrations are required to be filed. As such, the capacity filings in Case No. U-21775 cover the 2028/2029 PY.

⁴ A large IOU is considered to be an electric utility with one million customers or more, and a smaller IOU is considered to be an electric utility with less than one million customers.

to maintain the **contract** four years forward regardless of any early out provisions” rather than “commitment to maintain the **contracted amount** four years forward regardless of any early out provisions.” February 27 order, p. 8 (emphasis in original to show revision); *see also, id.*, Exhibits A, B, C, and D. The Commission also added language to the Capacity Demonstration Process and Requirements document, stating that “maintaining the contract four years forward” does not prohibit an LSE from selling surplus capacity to a buyer at some point in the future via a new contract. Additionally, the Commission included the following language in the revised Capacity Demonstration Process and Requirements document and General Affidavit to clarify that any surplus capacity sold must not be used by another LSE in that same year’s demonstration to avoid the double counting of capacity: “Statements to achieve/maintain resources do not prohibit an LSE from entering into future transactions to sell surplus capacity provided that the same capacity is not used by another Michigan LSE as part of its capacity demonstration for the same planning year.” February 27 order, pp. 8-9; *see also, id.*, Exhibits A and B.

In compliance with Section 6w(8) and the August 22 order, all LSEs required to file capacity demonstrations by the directed deadlines have filed, and on May 12, 2025, the Staff filed its Capacity Demonstration Results: The Planning Year 2028/29 report (Staff Report).

Additionally, on April 29, 2025, the Staff filed the 2025 Statewide Energy Storage Target Calculation, which is the calculation that identifies each LSE serving customers in Michigan and its proportional share of the minimum statewide energy storage target, using peak load information for the previous five years filed in capacity demonstration filings under Section 6w. The Staff performed this calculation in accordance with the methodology approved by the Commission in the January 23, 2025 order in Case No. U-21571 (January 23 order). In the 2025

Statewide Energy Storage Target Calculation filing, the Staff explains that the calculation is to be used by LSEs filing either an energy storage plan or contracts for the necessary qualifying storage facilities in the current year, in accordance with Section 101 of Public Act 235 of 2023, MCL 460.1101. These calculations will be updated annually by the Staff to allow for LSEs filing in that year to use the most recent data. Future updates to the calculated storage capacity for each LSE will be filed by the Staff annually through 2029, in the open docket for LSE capacity demonstration filings, within 30 days after the completion of capacity demonstration filings as required under Section 6w for that year. *See*, Case No. U-21775, filing # U-21775-0057; *see also*, January 23 order, p. 29.

This order summarizes the Staff Report, addresses recommendations therein, and opens a new docket, Case No. U-21907, for the receipt of capacity demonstration filings for the 2029/2030 PY.

The Commission Staff Report

Following an executive summary of the Staff Report, the Staff explains that, as part of its pre-capacity demonstration process, it consulted with several LSEs to discuss the requirements of the capacity demonstration process.

Turning to the capacity demonstration filings, the Staff states that by February 24, 2025, DTE Electric Company (DTE Electric) and Consumers Energy Company (Consumers) filed capacity demonstrations; by March 3, 2025, Alpena Power Company, Indiana Michigan Power Company (I&M), Northern States Power Company, Upper Michigan Energy Resources Corporation, and Upper Peninsula Power Company filed capacity demonstrations; and by March 17, 2025, American Rural Cooperative, Bayfield Electric, Calpine Energy Solutions, LLC, City of Escanaba, City of Stephenson, City of Wakefield, Cloverland Electric Cooperative,

CMS ERM Michigan LLC, Constellation NewEnergy Inc., Croswell Light and Power, Daggett Electric Department, NRG Energy Services LLC f/k/a Direct Energy Services LLC, Energy Harbor LLC, the Michigan Public Power Agency, Michigan South Central Power Agency (MSCPA), Newberry Water and Light Board, Union City Electric Department, Wolverine Power Supply Cooperative, Inc., and WPPI Energy filed capacity demonstrations. The Staff states that all LSEs, with the exception of MSCPA, discussed *infra*, were able to procure capacity necessary to demonstrate compliance in all four seasons of the 2028/2029 PY at the time of the LSE's filing. Per the Staff Report, two LSEs' filings indicated a shortage of capacity in the compliance year compared with projections of forecasted growth. However, Section 6w requires all LSEs to demonstrate enough resources to cover prompt-year obligations, and both LSEs met this requirement. Following a review of the two filings, the Staff determined that these entities demonstrated sufficient capacity. The Staff notes that both LSEs are in negotiations to acquire the appropriate amount of capacity needed to meet their forecasted growth. Staff Report, p. 6. The Staff adds that several AESs filed letters in the docket indicating that they are currently not serving customers in Michigan and, therefore, did not make a capacity demonstration filing.⁵

The Staff explains that it audited each capacity demonstration filing and requested more information when necessary. Per the Staff Report, each filing included the demonstration for the required compliance year (2028/2029 PY) and that most filings included an update for the 2025/2026 PY through the compliance year and complied with the Commission's directive in the

⁵ The AESs that filed letters in Case No. U-21775 indicating that they are currently not serving customers in Michigan include the following: AEP Energy Inc.; BP Energy Retail Company LLC; Dillon Power LLC; Direct Energy Services LLC; Energy Services Providers, Inc.; Interstate Gas Supply, LLC; Just Energy Advanced Solutions LLC; ENGIE Power and Gas LLC; Energy International Power Marketing Corporation; MidAmerican Energy Services, LLC; Nordic Energy Services, LLC; Texas Retail Energy, LLC; and UP Power Marketing LLC. Staff Report, p. 6, n. 8.

August 22 order for LSEs to include data for the prompt year (2025/2026 PY) and interim years (2026/2027 PY and 2027/2028 PY) in their capacity demonstrations. In the cases of municipal and cooperative utilities that provided only the compliance year, the Staff states that it was able to estimate the amount of capacity available for the prompt and interim years. The Staff recommends that the Commission continue to require LSEs to include updated prompt and interim year capacity obligation and resource obligation information in future filings as this information aids the Staff in tracking changes to load and resources and in projecting the zonal resources adequacy more accurately. Staff Report, pp. 6-7.

Turning to MSCPA, the Staff indicates that at the time of the filing of the Staff Report, MSCPA did not have rights to sufficient capacity to meet its capacity obligations. The Staff explains that MSCPA was in the process of negotiating a bilateral contract to meet the deficiency with the intent to submit a revised capacity demonstration by the self-imposed deadline of September 1, 2025, showing sufficient resources to meet its capacity requirements. The Staff states that it met with MSCPA on April 30, 2025, to discuss its capacity compliance and to encourage urgency in securing the capacity necessary to meet its obligations. Staff Report, p. 7. Subsequent to the filing of the Staff report on May 12, 2025, MSCPA filed under seal a revised capacity demonstration on July 23, 2025. *See*, Case No. U-21775, filing # U-21775-0059. On August 12, 2025, the Staff filed a memorandum in Case No. U-21775 indicating that it had reviewed MSCPA's confidential filing and confirming that MSCPA acquired a new capacity resource to meet its 2028/2029 PY capacity requirements for all four seasons. *See*, Case No. U-21775, filing # U-21775-0060.

The Staff Report also gives an overview of zonal resource adequacy for Michigan, which contains load that spans two regional transmission organizations (RTOs), MISO and PJM, with

the majority of the state's load located in MISO's footprint. Beginning with MISO resource adequacy, the Staff explains that Michigan LSEs serve load in MISO local resource zones (LRZs or zones) 1, 2, and 7.⁶ The Staff then explains MISO's resource adequacy construct as follows:

MISO establishes capacity obligations for all LSEs based on peak load forecasts and a planning reserve margin [(PRM)] percentage [] necessary to meet the North American Electric Reliability Corporation's (NERC[s]) Loss of Load Expectation (LOLE) standard of 1 day in 10 years. LSEs within MISO can meet their capacity requirements either through a Fixed Resource Adequacy Plan (FRAP), self-schedule, Reliability Based Demand Curve (RBDC) opt-out (new this planning year [. . .]), paying the capacity deficiency charge, or through the Planning Resource Auction (PRA). The PRA is a residual market for LSEs that choose not to utilize other participation options or do not have enough capacity resources, either owned or purchased bilaterally, to satisfy their capacity obligations, and thus need to purchase additional resources.

Within MISOs [sic] resource adequacy construct, the Planning Reserve Margin Requirement [PRMR] and the LCR [local clearing requirement] must be satisfied to meet the LOLE. The PRMR is determined through LOLE modeling based on the coincident MISO peak forecast and resources adjusted as necessary to meet the standard. PRMR resources are not location specific, i.e. they can come from outside an LSE's zone. Individual LSEs are responsible for their own share of the zone's PRMR. The ability to use imports to meet PRMR makes it likely all zones will meet this requirement. Failure to meet PRMR would only occur if there were not enough resources available within all of MISO's footprint or in the subregion (MISO North/Central or MISO South) given subregional transmission constraints.

Staff Report, p. 9.

Explaining the LCR further, the Staff states that the LCR is the minimum required capacity to be located within a zone to meet the LOLE standard while accounting for the zone's ability to import. The LCR is for the entire zone, not an individual LSE. The Staff notes that, at this time,

⁶ The majority of the Lower Peninsula falls into Zone 7, with the exception of the southwest corner that is located within PJM's territory. The majority of the Upper Peninsula falls within Zone 2, with the exception of a small area in the most western corner that falls into Zone 1.

there is no LCR requirement under MCL 460.6w applicable to individual LSEs in Michigan.⁷

The Staff explains that:

[t]he LCR is determined by performing a LOLE analysis on each zone individually, to determine the Local Reliability Requirement (LRR), or the

⁷ MCL 460.6w(8) requires an LCR as part of the SRM capacity demonstrations. In the September 15 order, the Commission indicated that it would open a contested case to establish the LCR for future capacity demonstrations beginning in 2022 and beyond. September 15 order, pp. 40-42. This order was appealed on two grounds: (1) that the Commission lacked the authority to impose an LCR on individual providers and (2) that if the Commission has the authority, it must implement the LCR pursuant to a rulemaking under the Administrative Procedures Act of 1969 (APA), MCL 24.201 *et seq.* While the September 15 order was on appeal, the Commission issued an order in Case No. U-18444 establishing a methodology to apply the LCR to individual energy providers. June 28, 2018 order in Case No. U-18444, pp. 122-131. On September 13, 2018, the Commission issued an order (September 13 order) granting a motion for stay in Case No. U-18444, putting a hold on the implementation of the LCR pending the outcome of the appeal of the September 15 order. September 13 order, pp. 9-13. The Michigan Court of Appeals subsequently ruled that the Commission did not have the authority under Act 341 to impose an LCR on individual providers. *In re Reliability Plans of Electric Utilities for 2017-2021*, 325 Mich App 207, 221; 926 NW2d 584 (2018). The Court of Appeals did not address the second point of the appeal, which was that if the Commission did have such authority, the LCR requirement should be implemented through a rulemaking pursuant to the APA. The Michigan Supreme Court reversed the Court of Appeals, finding that the Commission does have the authority pursuant to MCL 460.6w to impose an LCR on individual providers and remanded the case to the Court of Appeals for further review to determine the Commission's compliance with the APA in imposing the LCR. *In re Reliability Plans of Electric Utilities for 2017-2021*, 505 Mich 97, 102; 949 NW2d 73 (2020). On December 3, 2020, the Court of Appeals held that the September 15 order (imposing an LCR on AESs individually in Case No. U-18197) did not equate to administrative rules in violation of the APA and did not exceed the Commission's authority granted by the Legislature. *In re Reliability Plans of Electric Utilities for 2017-2021*, unpublished per curiam opinion of the Court of Appeals, issued December 3, 2020 (Docket Nos. 340600 and 340607).

Energy Michigan, Inc. (Energy Michigan) and the Association of Businesses Advocating Tariff Equity (ABATE) filed a complaint in federal district court challenging the constitutionality of the individual LCR. On February 24, 2023, the United States District Court for the Eastern District of Michigan issued a judgment in favor of the Commission dismissing with prejudice the complaint filed by Energy Michigan and ABATE and finding that the plaintiffs did not meet their burden to show that the individual LCR requirement discriminates against interstate commerce, while the defendants established the necessity and legitimate purpose of the LCR in ensuring grid reliability that cannot be accomplished via reasonable nondiscriminatory alternatives. On March 24, 2023, the plaintiffs filed a joint notice of appeal of the February 24, 2023 final judgment to the United States Court of Appeals for the Sixth Circuit. Given the appeal, litigation regarding the LCR requirements is currently pending at the federal level.

resources a zone would need to meet the loss-of-load standard if it were separated from MISO. Separately, MISO determines the import and export limits for each zone by performing a seasonal transfer analysis study. The study produces Zonal Import Ability (ZIA) and Zonal Export Ability (ZEA) values, which are then adjusted by the amount of controllable exports to non-MISO load to determine Capacity Import Limits (CIL) and Capacity Export Limits (CEL). The ZIA is an input to the LCR calculation, and the LCR, CEL, and CIL, and subregional constraints are inputs to the PRA clearing process.

Staff Report, p. 9.

The Staff states that in the 2023/2024 PY, MISO implemented a seasonal resource adequacy requirement for each summer, fall, winter, and spring season and a seasonal accredited capacity (SAC) methodology for certain resources participating in MISO's PRA to align with real time availability and planned outages. The Staff explains that it reviewed these changes with participants in technical conferences per the June 22, 2022 order in Case No. U-21099. The August 22 order (the capacity demonstration docket for the 2027/2028 PY) directed LSEs in MISO to demonstrate seasonal capacity obligations based on MISO's seasonal resource adequacy construct. Staff Report, p. 10. Discussing other changes in MISO, the Staff states that on June 27, 2024, FERC accepted MISO's RBDC tariff revisions to incorporate sloped demand curves into the PRA. *Id.*; *see also*, *Order Accepting Tariff Revisions*, 187 FERC ¶ 61,202 (June 27, 2024).

If an LRZ does not have enough resources to meet its seasonal requirements, the entire zone clears at the seasonal cost of new entry (seasonal CONE). For the 2025/2026 PY, seasonal CONE (in dollars per megawatt- (MW-) day) is equal to \$130,930 per MW-year divided by the number of days in the seasons experiencing shortage in Zone 7. The Staff clarifies that this resource adequacy construct is based on probabilistic determinations and that failure to meet the requirements would not necessarily mean that the LRZ will experience a loss of load event.

Staff Report, p. 10.

Providing further detail regarding the RBDC, the Staff explains that MISO introduced sloped demand curves in its resource adequacy construct in the 2025 PRA. Per the Staff Report, the systemwide RBDC addresses overall reliability needs across the entire system, while the subregional RBDCs capture additional reliability requirements specific to each subregion. While delayed for the time being due to the complexity of adding another 10 curves per season, MISO ultimately seeks to develop RBDCs at the LRZ level. The Staff then explains how MISO develops each curve and its relation to reliability and pricing metrics. Staff Report, pp. 10-11 (referencing MISO’s Reliability-Based Demand Curves Conceptual Design White Paper (September 2023), available at [20230906 RASC Item 02 Draft RBDC White Paper630104.pdf](#) (last accessed August 21, 2025)).

The Staff further explains that:

[t]he RBDCs fundamentally change the objective function of the PRA, from minimizing as-offered costs to minimizing the difference between supply offers and demand offers to maximize social surplus. The clearing quantities may vary from the initial PRMR, but the value of the reliability contribution of any additional MWs cleared must be greater than or equal to the cost of procuring those MWs. The PRA is conducted using an optimization to simultaneously complete the following tasks: (1) meet the supply demand balance both for MISO and for each of the two Planning Areas (MISO North/Central and MISO South); (2) meet the LCR for each LRZ; (3) efficiently use transmission transfer capability between LRZs; and (4) respect the Sub-Regional Power Balance Constraint. Step 1 of the auction clearing process solves an optimization problem to identify which type of RBDC produces a higher MW obligation for a given subregion, share-of-Systemwide or Subregional. Step 2 of the process solves the clearing and pricing problem based on the RBDC identified in step 1 and outputs both the resource clearing (Final PRMR) and the auction clearing price (ACP) for each LRZ and External Resource Zone. A final step verifies the solution found in step 2. The auction clearing price is determined by where the supply offer curve meets the applicable RBDC, and is equal to the marginal cost of capacity, the regional marginal cost of capacity, the marginal cost of financially binding LCR, CEL, and CIL for an LRZ, and the marginal cost of financially binding Subregional Export Constraints and Subregional Import Constraints. For more information on auction clearing under RBDC[,], see Appendix M of MISO’s Business Practice Manual 11.

Staff Report, p. 11. The Staff adds that MISO included an RBDC Opt-Out mechanism that allows an LSE to opt-out provided it cannot then include a partial opt-out, the opt-out will be locked in for three consecutive years, and it must include the RBDC opt-out adder percentage in its obligation. *Id.*

Speaking to future resource adequacy construct changes, the Staff reports that MISO has recently filed or is currently working on FERC filings to address challenges related to demand side resources and that MISO intends to implement enhanced resource adequacy risk modeling and a Direct Loss-of-Load (DLOL) accreditation methodology beginning in planning year 2028/2029. Staff Report, p. 12 (citing FERC Docket No. ER24-1638-000 (application filed March 28, 2024)). Starting with the 2025/2026 PY, MISO has committed to publishing indicative accreditation results based on the DLOL methodology prior to each PRA. The Staff explains that these proposed reforms will align the PRMR with accreditation of all resource classes but given the ongoing work, the indicative PRMR values under DLOL are not yet available. The Staff recounts that several LSEs asked whether DLOL accreditation should be used in this instant capacity demonstration case since the demonstration year aligns with the first year of DLOL implementation (2025/2026 PY). The Staff recommends that LSEs follow the prompt-year MISO adequacy resource construct and also recommends that the Commission determine a timeline to implement MISO's DLOL accreditation changes into the state capacity demonstration process if it deems it necessary to implement these changes prior to MISO's tariff changes effective in PY 2028/2029.

For MISO Zone 7, the Staff provides a table showing the annual MISO LOLE report data, as well as another table showing a comparison of LRZ 7 aggregated resources demonstrated plus known undemonstrated resources likely to still be available for each season in PY 2028/2029 and

MISO's resource adequacy requirements for PY 2025/2026. *Id.*, pp. 13-15. With the caveat that its findings are based on projections that are subject to change, the Staff concludes that Zone 7 has a surplus of resources compared to the projected LCR for all four seasons. Specifically, Zone 7's summer PRMR is 21,228 zonal resources credits (ZRCs) and the LCR is 19,681 ZRCs. The total LRZ 7 resources offered in the PRA for the summer season in the prompt year is 20,884 ZRCs, which exceeds the anticipated LCR by 2,203 ZRCs but falls short of the zone's portion of PRMR. *Id.*, p. 16. The zone relied on 785.5 ZRCs of external resources to meet its resource adequacy requirement target. *Id.*

For the interim years, the Staff Report contends that again, while subject to change, LRZ 7 has a capacity surplus for both years compared to the projected LCRs. The Staff notes that the capacity margin appears tight in 2026/2027 across all four seasons with the tightest capacity position in the fall season. *Id.*, pp. 16-17.

As to Zone 2, which encompasses most of Michigan's Upper Peninsula and parts of Wisconsin, the Staff notes that MISO does not define MW capacity import or export limits between states within the same MISO zone and therefore, the data available to the Staff is not comprehensive enough to project a zonal capacity position for Michigan's Zone 2 similar to Zone 7. However, the Staff was able to conclude that: (1) all Michigan LSEs in Zone 2 demonstrated sufficient capacity resources, and (2) the 2024 MISO PRA results indicated an installed capacity surplus in PY 2024/2025. The Staff also states that Zone 2 has CILs of 4,370 MW in summer; 6,537 MW in fall; 6,522 MW in winter; and 6,439 MW in spring. *Id.*, p. 17.

Turning to Zone 1, which includes a small fraction of Michigan's Upper Peninsula, the Staff reports that all Zone 1 LSEs demonstrated sufficient capacity obligations for the compliance year

and that the 2025/2026 MISO PRA shows sufficient capacity for each season in PY 2025/2026, adding that Zone 1 relied on a small amount of imports to meet its resource adequacy target in winter and spring. *Id.*, p. 17.

For Michigan LSEs serving load within PJM, the Staff notes that only a few LSEs in Michigan serve load within the PJM territory but that these LSEs are still subject to the capacity requirements of Section 6w. LSEs in PJM must meet capacity obligations through participation in PJM's reliability pricing model base residual auction (BRA) or through PJM's fixed resource requirement (FRR) plan. I&M, the largest Michigan-serving LSE in PJM, uses the FRR and indicates in the instant capacity demonstration that it plans to continue to do so. The Staff Report includes a table presenting a summary of PJM's capacity demonstration, and the Staff states that all PJM LSEs have sufficient capacity and that it expects all PJM LSEs to continue to meet their capacity obligations with continued monitoring by the Staff. Staff Report, p. 18.

The Staff also notes that I&M's customer choice cap was reset to 10% on February 1, 2019, pursuant to MCL 460.10a(1)(c) and the July 12, 2017 order in Case No. U-16090 (July 12 order). July 12 order, p. 3. I&M is responsible for providing capacity for its choice program, but if its suppliers opt to self-supply capacity, the company will need to include this in its FRR plan. Per the Staff Report, NERC projects PJM to have sufficient electric supply and categorizes PJM as having an elevated risk level post 2026, with resource additions not keeping up with generator retirements and demand growth, and with winter replacing summer as the higher risk period because of generator performance and fuel supply issues. Lastly, the Staff notes delays in PJM's BRA schedule due to pending decisions from FERC related to the capacity auction. The Staff Report also provides the current BRA schedule, which is scheduled to take place every six months until the schedule is no longer delayed. Staff Report, pp. 18-19.

In compliance with the Commission’s request in the September 15 order, the Staff provides a table in the report identifying the capacity by type for each individual electric provider (without revealing the provider’s identity) with a breakdown for each provider included as Appendix A to the Staff Report. The table describes the supplier type and the percentage of their demonstrated capacity that is owned; derived from demand response (DR), a power purchase agreement, or ZRC contract; or acquired at auction. Staff Report, pp. 19-20.

Explaining DR as an optional source of capacity, the Staff describes DR as having a prominent role in LSEs’ integrated resource plan (IRP) filings and the Staff’s obligation to complete a statewide study of DR potential in Michigan every five years. The Staff states that Consumers and DTE Electric included DR in their respective IRP filings and capacity demonstrations and that the Staff will continue to monitor Consumers’ and DTE Electric’s DR as well as DR use across Michigan. *Id.*, p. 20.

Noting the Commission’s affirmation of an AES’ ability to offer DR programs through curtailment service providers or third-party aggregators, the Staff states that it is aware of 85 ZRCs of DR offered into the 2025 MISO capacity market. The Staff continues to collaborate to ensure that aggregated DR load modification is accounted for when dispatched on MISO’s coincident peak and to monitor FERC Order 2222⁸ discussions. *Id.*, p. 21.

As to ZRC contracts, the Staff recommends that forward ZRC contracts be used for capacity demonstration purposes to specify delivery of the ZRCs in the MISO Module E Capacity Tracking (MECT) tool prior to the applicable PRA auction. There was an increase in the

⁸ *Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators*, 172 FERC ¶ 61,247 (September 17, 2020). FERC issued subsequent versions of FERC Order 2222, namely FERC Order 2222-A and FERC Order 2222-B. *See*, 174 FERC ¶ 61,197 (March 18, 2021) and 175 FERC ¶ 61,227 (June 17, 2021), respectively.

percentage of ZRC contracts utilized this year by utilities, municipal utilities, and cooperatives compared to last year's capacity demonstration. The Staff highlights the following:

An important thing to note is that ZRCs are defined in MISO's tariff and are created in the prompt year when UCAP [unforced capacity] for supply-side and demand-side resources are converted into ZRCs in the MISO MECT. ZRCs for any year further out than the prompt year are projected and don't become ZRCs until the prompt year. ZRCs are fungible products that can be sold or transferred, and in some cases, sold more than once. The characteristics of ZRCs allow for them to be easily traded and tracked within the MISO MECT. MISO has a view into the source and transfers of those ZRCs that occur prior to the PRA in the prompt year, and those ZRC transfers are audited by Staff as a secondary check on the ZRC contracts utilized in the capacity demonstrations.

Staff Report, p. 21.

Following a brief explanation of its process for accounting for AES load switching, which was made more complex with the change to the seasonal construct, the Staff states that it continues to see an increase in load switching among LSEs. *Id.*, pp. 21-22. The Staff recommends that LSEs that include load switching information in their filing include it within the Contracted Resources section on the spreadsheet templates provided for the capacity demonstration for the demonstration years as well as the interim years. The Staff also recommends that both the losing and the gaining suppliers have copies of the load switching affidavits in each of their filings, enabling the Staff to easily cross-reference that the load is being accounted for.

Lastly, the Staff includes a discussion of capacity retirements and additions, stating that NERC's 2024 Long Term Reliability Assessment shows added resource capacity on the Bulk Power System (BPS) falling short of industry projections the year prior, demonstrating an over-projection of natural gas, solar, and wind resources, and giving evidence to project delays. Additionally, the Lawrence Berkeley National Laboratory's April 2024 interconnection queue study showed that only 19% of the projects (and just 14% of their capacity) that submitted

interconnection requests from 2000 to 2018 reached commercial operations by the end of 2023. *Id.*, p. 22. Because of interconnection backlog issues, the Staff notes that some RTOs have taken steps to address these issues including PJM’s Reliability Resource Initiative, both PJM’s and MISO’s work to reduce queue cycle times through automation, and MISO’s Expedited Resource Addition Study (ERAS) process.⁹ The Staff conveys that Michigan continues to follow national trends showing a tightening capacity position due to scheduled retirements outpacing replacement capacity buildout. The Staff notes that it met with LSEs to discuss their capacity concerns and explains that various factors could cause delays for new capacity additions, namely broad economic factors such as supply chain constraints, labor shortages, high component prices, and delays associated with obtaining permitting, regulatory approval, or interconnection queue delays. Per the Staff:

The issue may be further exacerbated should demand increase faster than expected due to unanticipated loads such as data centers, as well as electrification of the building and transportation sectors. Staff has noted a significant number of planned resources used as demonstrated capacity in this case and recent previous cases that have not come to fruition in the demonstration year as planned, with estimates in the range of 900-1000 MW/year removed from the list of planned resources due to delays or cancellations. There are many instances of this occurring with IRP-identified resources, consequently Staff met with both large investor-owned utilities to discuss this issue in depth and determine what actions can be taken to overcome the delays. One of these utilities indicated they are in the process of quantifying project delays and terminations, and early estimates showed an average delay of ~1.5 years past Commercial Operation Date (COD) and a project failure rate greater than 25%.

⁹ At the time the Staff Report was filed, MISO’s ERAS process was pending approval before FERC. Following an initial rejection by FERC on May 16, 2025, and subsequent revisions to its ERAS proposal by MISO, FERC approved MISO’s revised filing on July 21, 2025, 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. *See, 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. *See, July 21 order*, pp. 98, 135.

Staff Report, pp. 22-23. The Staff adds that some capacity from the Palisades Nuclear Power Plant was included in Michigan’s capacity demonstration for Spring 2026 (the remainder of the capacity is being contracted by an LSE in Indiana). The Palisades capacity would provide resource adequacy benefits to Zone 7 and be counted towards meeting the LCR for Zone 7.¹⁰ Staff Report, p. 23.

In its conclusions and recommendations, the Staff repeats that all LSEs have complied with their capacity demonstration obligations pursuant to Section 6w and expresses its appreciation for the cooperation of all LSEs. *Id.*, pp. 20-21. The Staff then presents a summary of its recommendations:

1. Staff recommends the Commission continue to direct all LSEs to include updated prompt year and interim year capacity obligation and resource information in future filings.
2. Staff recommends the Commission direct all LSEs to provide [an] MECT screenshot of their prompt load obligations (PRMR/PLC [peak load contribution]) to facilitate the Storage Target calculation used to comply with Public Act 235.
3. The Commission should determine a timeline to implement MISO’s DLOL accreditation changes into the state capacity demonstration process if it deems it necessary to implement prior to MISO tariff changes effective PY 2028-29.
4. Staff recommends that filing entities who include load switching information in their filing include it within the Contracted Resources [section] on the spreadsheet templates provided for the capacity demonstration for the demonstration years as well as the interim years. Staff also recommends that both the losing and the gaining suppliers have copies of the load switching affidavits in each of their

¹⁰ At the time of the filing of the Staff Report, the re-start of the Palisades Nuclear Plant was pending approval before the U.S. Nuclear Regulatory Commission (NRC). On July 24, 2025, NRC granted some key approvals necessary to the re-start of the Palisades Nuclear Plant. Namely, NRC approved six exemptions from the requirements of Title 10 of the Code of Federal Regulations (10 CFR) Section 50.82(a)(2), “Termination of license,” concerning the prohibition against operating the reactor and emplacing fuel into the reactor vessel for the Palisades Nuclear Plant. The exemptions will be effective on August 25, 2025. *See*, NRC Docket No. 50-255; NRC-2025-0346 (July 24, 2025). However, other licensing actions remain pending before NRC as of the date of this order.

filings, so Staff is able to cross check that the load is being accounted for.

Staff Report, p. 23.

Discussion

To begin, the Commission appreciates the efforts of the Staff in obtaining and analyzing the capacity information needed for this year's capacity demonstrations and for drafting the Staff Report as well as the filing of the 2025 Statewide Energy Storage Target Calculation. The Commission also appreciates the cooperation of all Michigan LSEs for their capacity demonstration filings.

Before addressing the Staff Report, the Commission takes this opportunity to note an update relevant to the state's capacity outlook that occurred after the filing of the Staff Report. On May 23, 2025, the U.S. Department of Energy (DOE) issued an emergency order to MISO in coordination with Consumers, pursuant to Section 202(c) of the Federal Power Act, to ensure that the J.H. Campbell Power Plant (Campbell Plant) in West Olive, Michigan remains available for operation to minimize any potential generation shortfall that could lead to unnecessary power outages. *See*, DOE, Order No. 202-25-3 (May 23, 2025). The Campbell Plant was scheduled to cease operations on May 31, 2025. The Commission notes that the retirement of the Campbell Plant was planned for in Consumers' 2022 IRP and replacement capacity has been procured through the purchase of a natural gas fired power plant in 2023, extending the retirement dates for two other fossil fuel units, increasing demand side resources such as DR and energy waste reduction, and adding renewable energy and energy storage resources through 2040. *See*, June 23, 2022 order in Case No. U-21090, pp. 5, 95 (approving a settlement agreement resolving all issues in the case); *see also, id.*, Exhibit A, pp. 4-5. Consumers also filed its capacity demonstration on February 24, 2025, prior to the issuance of the DOE's emergency order and

demonstrated sufficient capacity for the compliance PY. *See*, Case No. U-21775, filing # U-21775-0012; *see also*, Staff Report, pp. 6, 23.

Turning to the Staff Report, the Commission accepts the Staff Report's findings regarding resource adequacy in MISO LRZs 1, 2, and 7 and in the PJM market, the capacity demonstrations made by the LSEs, and the 2025 Statewide Energy Storage Target Calculation. The Commission also accepts the Staff's filing of a memorandum in this docket on August 12, 2025, confirming its review of MSCPA's revised capacity demonstration filing indicating that MSCPA has secured the capacity necessary to satisfy its capacity obligation under Section 6w. The Commission finds that MSCPA has resolved its capacity shortage issue and has now complied with the requirements of Section 6w.

As noted in last year's capacity demonstration report, the Staff stated in this year's report that most LSEs included updates for the 2025/2026 PY through the 2027/2028 PY. For the upcoming capacity demonstration in Case No. U-21907, the Commission agrees with the Staff's recommendation for LSEs to continue providing this additional information and thus, directs LSEs to provide capacity resource data for the prompt year (2026/2027) and interim years (2027/2028 and 2028/2029) in addition to the compliance year (2029/2030) data. The additional data is to be included in the upcoming February 24, March 3, and March 17, 2026 capacity demonstration filings opened by this order in Case No. U-21907. The Staff shall then file its 2029/2030 PY capacity demonstration report in Case No. U-21907 no later than May 12, 2026.

Before addressing the Staff's recommendations, the Commission notes that in the Staff Report, the Staff described the DLOL accreditation and referenced MISO's application for approval of the revised tariff to establish DLOL accreditation that was filed with FERC on March 28, 2024. The Commission adds that on October 25, 2024, FERC approved MISO's

proposed tariff revisions to establish the DLOL accreditation methodology. *See*, 189 FERC ¶ 61,065 (October 25, 2024). As the Staff indicated, MISO will implement the DLOL accreditation methodology in the 2028/2029 PY and is continuing its work to provide the PRMR values under the DLOL methodology. The Staff recommended that the Commission determine a timeline to implement MISO's DLOL accreditation changes into Michigan's capacity demonstration process if the Commission finds such action to be necessary prior to the effective date of the revised MISO tariff in 2028/2029. The Commission finds that establishing such a timeline is not necessary at this time given MISO's ongoing work to establish the PRMR values that will be used in the DLOL methodology. Therefore, the Commission will continue to monitor MISO's progress in this area and will revisit this issue as more information becomes available. At this time, the Commission agrees with the Staff's recommendation to LSEs for the instant capacity demonstration and for future demonstrations that they should follow the prompt-year MISO resource adequacy construct.

Turning to the Staff's other recommendations, the Commission finds these recommendations to be reasonable and necessary to provide the Commission with comprehensive information regarding an LSE's capacity position for the prompt, interim, and compliance years and to satisfy the requirements of Section 6w. Therefore, with the exception of the establishment of a timeline to implement DLOL into Michigan's capacity demonstration process, the Commission adopts the Staff's recommendations set forth in the Staff Report. *See*, Staff Report, p. 23.

With this order, the Commission also opens the Case No. U-21907 docket for the purpose of receiving next year's capacity demonstrations from required LSEs pursuant to Section 6w. As mentioned above, electric utilities required to file capacity demonstrations pursuant to Section 6w(8)(a) for the 2029/2030 PY shall make that filing no later than 5:00 p.m. (Eastern

time (ET)) on February 24 and March 3, 2026 in Case No. U-21907. LSEs required to file capacity demonstrations pursuant to Section 6w(8)(b) for the 2029/2030 planning year shall make that filing no later than 5:00 p.m. (ET) on March 17, 2026, in Case No. U-21907. Electric utilities and LSEs shall include in their respective filings capacity resource data for the prompt (2026/2027) and interim years (2027/2028 and 2028/2029) as well as the compliance year (2029/2030). All LSEs making required filings pursuant to Section 6w(8) shall utilize the Capacity Demonstration Filing Process and Requirements document, General Affidavit, and, as applicable, AES Load Switching Affidavit attached to this order as Exhibits A, B, and C, respectively. All filing LSEs shall also provide an MECT screenshot (or equivalent) of their prompt load obligations (PRMR/PLC) to facilitate the energy storage target calculation used to comply with Act 235. Lastly, LSEs who include load switching information in their capacity demonstration filing shall include such information within the Contracted Resources section on the spreadsheet templates provided for the capacity demonstration for the demonstration years as well as the interim years. Also, both the losing and the gaining suppliers in the load switching arrangement shall include copies of the AES Load Switching Affidavit, attached to this order as Exhibit C, in each of their capacity demonstration filings, enabling the Staff to easily cross-reference that the load is being accounted for.

THEREFORE, IT IS ORDERED that:

A. The Commission Staff's May 12, 2025 Capacity Demonstration Results Report and 2025 Statewide Energy Storage Target Calculation filed in Case No. U-21775 are accepted.

B. Electric utilities required to file capacity demonstrations pursuant to MCL 460.6w(8)(a) for the 2029/2030 planning year shall make that filing no later than 5:00 p.m. (Eastern time) on February 24 and March 3, 2026, in Case No. U-21907, as described in this order and in the

Capacity Demonstration Filing Process and Requirements document attached to this order as Exhibit A. Load serving entities required to file capacity demonstrations pursuant to MCL 460.6w(8)(b) for the 2029/2030 planning year shall make that filing no later than 5:00 p.m. (Eastern time) on March 17, 2026, in Case No. U-21907. Electric utilities and load serving entities shall include in their respective filings capacity resource data for the prompt (2026/2027) and interim years (2027/2028 and 2028/2029) as well as the compliance year (2029/2030), as described in this order. Load serving entities required to file capacity demonstrations pursuant to MCL 460.6w(8) shall utilize the Capacity Demonstration Filing Process and Requirements document and General Affidavit attached to this order as Exhibits A and B, respectively.

C. The Commission Staff shall file a report analyzing the sufficiency of the capacity demonstrations for the 2029/2030 planning year no later than 5:00 p.m. (Eastern time) on May 12, 2026, in Case No. U-21907.

D. The Commission Staff shall file in Case No. U-21907 the update to the energy storage capacity amounts for electric providers using the Statewide Energy Storage Target Calculation within 30 days after the completion of the capacity demonstrations for the 2029/2030 planning year required under MCL 460.6w.

E. Any load serving entity required to file capacity demonstrations pursuant to MCL 460.6w(8) for the 2029/2030 planning year shall provide a Module E Capacity Tracking screenshot (or equivalent) of its respective prompt load obligations (planning reserve margin requirement/peak load contribution) to facilitate the energy storage target calculation used to comply with Public Act 235 of 2023, MCL 460.1001 *et seq.*, as described in this order.

F. Any load serving entity that includes load switching information in its capacity demonstration filing shall include it within the Contracted Resources section on the spreadsheet

templates provided for the capacity demonstration for the demonstration years as well as the interim years. Both the losing and the gaining suppliers in the load switching arrangement shall include copies of the AES Load Switching Affidavit, attached to this order as Exhibit C, in their respective capacity demonstration filings.

G. The docket in Case No. U-21775 is closed, and the docket in Case No. U-21907 is opened for the purpose of receiving the capacity demonstration filings for the 2029/2030 planning year and the Statewide Energy Storage Target Calculations to be filed by the Commission Staff.

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

Shaquila Myers, Commissioner

By its action of August 21, 2025.

Lisa Felice, Executive Secretary

CAPACITY DEMONSTRATION PROCESS AND REQUIREMENTS

The Michigan Public Service Commission (MPSC or Commission) will open a new docket annually for capacity demonstrations filings. The Commission order opening the capacity demonstration docket will provide updated requirements for load serving entities (LSE) to follow in making demonstrations. The capacity demonstration filings shall include four years of load obligations and capacity resources. The capacity demonstration for year four will be used to determine if the LSE has met its capacity obligations, while the data filed for years one through three will be used for informational purposes only. For the demonstration year, each LSE's capacity obligation will be equal to its most recent capacity obligation as specified by the applicable Independent System Operator (ISO).

For LSEs in the Midwest Independent System Operator (MISO), the capacity obligation will be based on the MISO seasonal resource adequacy construct. LSEs will be obligated to demonstrate enough capacity (owned or contracted) to meet the LSE's capacity obligation for each season. The specific capacity obligation for each season will be the LSE's prompt year (upcoming year) Initial Planning Reserve Margin Requirement (PRMR) for each respective season. According to the MISO Tariff, the Peak Load Contribution (PLC) for each retail customer in the Electrical Distribution Company's (EDC) area – including the EDC's own LSE – includes the retail customer's demand at the time of MISO's peak demand for each prior season, transmission losses, planning reserve margin %, and an adjustment factor for the prompt year seasonal EDC forecasts. The Initial PRMR for each LSE for a season consists of the sum of the PLCs for the retail customers assigned to that LSE¹. MISO LSEs will be obligated to demonstrate enough capacity for the demonstration year to meet its prompt year Initial PRMR MISO requirements².

For LSEs in PJM, the capacity obligation will be based on the PJM Reliability Pricing Model (RPM). LSEs in the PJM service territory can meet their Independent System Operator capacity obligations either through participation in PJM's (RPM) Base Residual Auction (BRA) or through PJM's Fixed Resource Requirement (FRR) capacity plan. The timing of PJM LSEs capacity demonstrations to the Commission will remain the same as those expected of MISO LSEs; however, PJM LSEs will be allowed to file an amended capacity demonstration two weeks after the completion of the BRA. The capacity demonstration should include the FRR capacity plan or BRA results. Meeting PJM's capacity obligations, including any applicable Percentage Internal Resources Required for the delivery year will constitute a satisfactory demonstration, and the demonstrating LSE should provide evidence that it has met PJM's capacity obligations.

LSEs shall provide documentation to Staff verifying the applicable capacity obligation from the LSEs ISO.³

¹ The Initial PRMR determination for all LSEs, including the EDC's own LSE, shall be made according to the MISO tariff. See MISO tariff Module E-1, Section 69A.1.1.e and Section 69A.1.2.1.b.

² LSEs that develop their load forecasts based on forward year values may use these values instead of prompt year values for capacity demonstration requirements if they are higher than the prompt year requirements. LSEs obligations should not be reduced to an amount less than the prompt year requirements due to declining forecasts for forward years.

³ Documentation could be included in the filing or shared in a meeting (virtual or in person) with Staff, similar to how resource contracts are shared.

Individual Locational Requirement

The individual locational requirement adopted by the MPSC in the June 28, 2018 Order in Case No. U-18444 remains stayed⁴. There is currently no individual locational requirement applicable to capacity demonstration filings.

Resource Demonstrations

As a default, resources shall be accredited as they are in their respective ISO.

For MISO LSEs, resources should be counted at the same seasonal accredited capacity value that they will receive in the prompt year for each season. If prompt year capacity value is not finalized, resources shall be counted at the seasonal accredited capacity level from the most recent information available.

For PJM LSEs, resources shall be based on the credited UCAP capacity value that they are credited within the PJM RPM for the demonstration year.

New resources (in either ISO) shall receive capacity credit they would reasonably receive within the various resource adequacy constructs. LSEs should provide documentation supporting the capacity accreditation of new resources.

Resource accreditation may vary from ISO accreditation if the LSE is able to provide reasonable support that the resource will be valued at a different capacity amount when the demonstration year becomes the delivery year. These variations will be evaluated by Staff on a case-by-case basis.

The minimum acceptable support for all resources submitted as part of a capacity demonstration is based upon the type of resource and is outlined below. Statements to achieve/maintain resources do not prohibit an LSE from entering into a future transaction to sell surplus capacity provided that the same capacity is not used by another Michigan LSE as part of its capacity demonstration filing for the same planning year.

Existing Generation (Owned)

The minimum acceptable support for existing generation that is included in a capacity demonstration include:

- 1) An affidavit from an officer of the company claiming ownership of the unit(s), including a commitment of the unit(s) to LSE load in the applicable demonstration year,
- 2) A copy of the existing resource qualification of the unit(s) from the applicable ISO, such as a MISO Module E Capacity Tracking Tool (MECT) screenshot in the MISO region, and;
- 3) If there are Michigan retail tariffs or customer contracts associated with the resources, copies shall be provided.

⁴ Stayed by the September 13, 2018 Order in Case No. U-18444.

**Existing Demand Response or Energy Efficiency Resources
(that have not been netted against load)**

The minimum acceptable support for existing demand response resources or energy efficiency resources that have not already been netted against load include:

- 1) An affidavit from an officer of the company outlining the resource(s), including a commitment to maintain at least that same level of resources four years forward,
- 2) A copy of the existing resource qualification of the resource(s) from the applicable ISO, such as a MISO MECT screenshot, and;
- 3) If there are Michigan retail tariffs or customer contracts associated with the resources, copies shall be provided.

New or Upgraded Generation (Owned)

The minimum acceptable support for proposed new generation include:

- 1) An affidavit from an officer of the company outlining the plans for the new generation including resources outlined in the utilities' most recent IRP,⁵ milestones such as planned in-service date, expected regulatory approval date(s), planned date to enter the generator interconnection queue, expected date for generator interconnection agreement, construction timeline, etc.,
- 2) Documentation supporting the expected resource qualification from the ISO for the new unit(s), and;
- 3) If there are Michigan retail tariffs or customer contracts associated with the resources, copies shall be provided.

For new generation submitted as part of a capacity demonstration, the LSE shall update and submit the above information on an annual basis with each subsequent capacity demonstration until the unit(s) are in service.

**New Demand Response or Energy Efficiency Resources
(that have not been netted against load)**

The minimum acceptable support for new demand response resources or energy efficiency resources that have not already been netted against load included in a capacity demonstration include:

- 1) An affidavit from an officer of the company outlining the plans for the resource(s), including a commitment to achieve and/or maintain at least that same level of resources four years forward,
- 2) Evidence that the customer's distribution utility has been notified of specific customers participating in the resource,
- 3) Specific plans to have the resource(s) qualified by the independent system operator, and;

⁵ If including resources included in the utility's most recent approved IRP, the utility shall also file a status update in the next capacity demonstration docket.

- 4) If there are Michigan retail tariffs or customer contracts associated with the resources, copies shall be provided.

For new demand response or energy efficiency resources submitted as part of a capacity demonstration, the LSE shall update and submit the above information on an annual basis with each subsequent capacity demonstration until the resource(s) are in service. Final qualification / approval from the independent system operator should be submitted in a subsequent demonstration.

Capacity Contract

The minimum acceptable support for capacity contracts with existing generation include:

- 1) An affidavit from an officer of the company including a copy of the contract that specifies the unit(s) or pool of generation that is the source of the contract, including the location of the unit(s) or pool. The affidavit shall include a commitment to maintain the contract four years forward regardless of any early out clauses in the contract, and;
- 2) A copy of the existing resource qualification of the unit(s) or pool from the applicable ISO, such as a MISO MECT screenshot.

Forward ZRC contracts

For MISO LSEs that use ZRC contracts to meet capacity obligations. The minimum acceptable support for forward ZRC contracts includes an affidavit from an officer of the company including a copy of the contract that specifies the zonal location of the ZRCs. The affidavit shall include a commitment to maintain the contract four years forward regardless of any early-out clauses in the contract. A forward ZRC contract that does not specify the zonal location of the ZRCs will be deemed insufficient towards meeting any portion of a locational requirement, unless the LSE provides other alternative support for the location of the ZRCs.

Any LSE that utilized a ZRC contract as part of their previous capacity demonstrations must provide prompt-year ZRC transfer documentation (such as a MECT Module E screenshot) or provide Staff with the ability to confidentially review ZRC transfers in person at the Commission office.

If the Commission were to implement an individual locational requirement, ZRC contracts submitted in an LSE capacity demonstration to meet this forward locational requirement must clearly designate that the resources are coming from the applicable zone. LSEs must provide evidence to support this. For resources currently located outside of the LSE's zone that will (by the demonstration year) count towards meeting the Local Clearing Requirement of the LSE's zone should be supported by evidence provided by the demonstration LSE. Existing contracts specifically with resources outside of an LSE's MISO zone will count towards meeting forward locational requirements if they are for a period of at least twenty years and the contracts were entered into prior to MISO's implementation of local resource zones on June 1, 2013.

Aggregated EERs, Aggregated Storage, Aggregated DERs

The minimum acceptable support for aggregated energy efficiency resources (EERs), aggregated storage, and aggregated distributed energy resources (DERs) include:

- 1) An affidavit from an officer of the company outlining the resource(s), including a commitment to achieve and/or maintain at least that same level of resource(s) four years forward,
- 2) Documentation from the ISO showing resource accreditation in the prompt-year for the resource(s), such as a MISO MECT screenshot, and;
- 3) If there are Michigan retail tariffs or customer contracts associated with the resource(s), copies shall be provided.

MISO PRA Purchases

The amount of ZRCs planned to be purchased through the MISO Planning Resource Auction (PRA) process⁶ that will be deemed prudent in an approved capacity demonstration will be limited to 5% of the LSE's total requirement. A capacity demonstration filed by an LSE that includes a plan to purchase ZRCs in the PRA four years in the future in excess of 5% will not constitute a demonstration that the LSE owns or has contracted resources to meet its future capacity obligations, unless those ZRCs are tied to specific identified resources that are committed to be offered in the PRA, by contract, on behalf of the LSE for the applicable planning year.

Interim Years⁷

Once the Commission has determined that the capacity demonstration made by an LSE is sufficient, it shall not be re-litigated or "trued-up" in the interim years. If, subsequent to its initial satisfactory capacity demonstration, an LSE experiences an unforeseen outage at one of its generation assets, or has variation in its total load obligations, these matters will be settled in the capacity auctions of the respective ISO. The LSE's initial capacity demonstration will not be re-examined to reconcile projected interim year load obligations or generating resource capacity ratings with actual values that are experienced in that interim year.

Additional Considerations for Capacity Demonstrations

Other types of documentation submitted as part of a capacity demonstration will be evaluated on a case-by-case basis. Because some of the documentation that is required to be filed in these proceedings is commercially sensitive, competitive information, it shall continue to be treated in a confidential manner, as has been done in the past. The Staff shall file a memo in the docket as directed by the Commission, outlining its findings from the demonstration filings, including a listing of any entities whose demonstration, in Staff's opinion, was insufficient.

In the case where a demonstration filing is deemed insufficient by Staff, Staff would recommend that the Commission open a contested case docket, whereby the LSE in question could attempt to prove that

⁶ Since 2012, LSEs do not literally purchase ZRCs in the PRA. The current terminology in the MISO tariff of "purchase through the PRA process" means that MISO is charging an LSE more for capacity to satisfy the LSE's PRMR than it is paying the LSE for ZRCs submitted into the PRA.

⁷ Year 1 (prompt year), Year 2, and Year 3 of the demonstration.

its capacity demonstration should be deemed acceptable. The outcome of that case would be a Commission order potentially authorizing Statewide Reliability Mechanism capacity charges to Retail Open Access customer load as well as a respective increase in capacity obligations assigned to the incumbent utility as the Provider of Last Resort for capacity service. Any contested demonstration cases will be opened as soon as practicable following the issuance of the Staff memo and be completed within six months.

If an LSE has met the capacity demonstration requirements, no contested case will be opened, and no further action will be taken regarding any capacity demonstration that has been deemed sufficient by Staff and accepted by the Commission.

Filing Timeline

Section 6w of Public Act 341 of 2016 gives specific filing dates for LSEs to make capacity demonstrations but gives the Commission the authority to adjust the dates if needed to properly align with the ISO procedures and requirements. The timeline below better aligns with the MISO PRA, allowing capacity obligations and resource accreditation to better match the values used by MISO in the prompt year.

For Demonstration Year 2029/2030	
Docket Opened by Commission	Summer/Fall 2025
Larger Investor-Owned Electric Utilities ⁸ Filing Due	February 24 th , 2026
Smaller Investor-Owned Electric Utilities ⁹ Filing Due	March 3, 2026
All Other LSEs Filing Due	March 17 th , 2026
Staff Report on Capacity Demonstration Findings	May 12 th , 2026
Commission Order	Summer/Fall 2026

The specific filing dates will be established by the Commission in each subsequent capacity demonstration docket and will generally align with the filing timeline above. LSEs will be allowed to supplement filings after the filing date and prior to Staff’s report, if changes at the ISO level, for capacity obligation or resource accreditation, necessitate updated filings¹⁰.

Demonstration Format

In addition to all of the items outlined above, Staff shall provide updated capacity demonstration documents (Reporting Templates and Sample Affidavits)¹¹ to be utilized by each LSE when filing its demonstration.

⁸ A large investor-owned utility is considered to be an electric utility with one million or more customers.

⁹ A smaller investor-owned utility is considered to be an electric utility with less than one million customers.

¹⁰ In this event, LSEs should notify Staff as soon as practicable that a supplemental filing is imminent and make the filing with sufficient time to allow Staff to review and incorporate those changes into the report.

¹¹ Documents will be posted to the MPSC Capacity Demonstration webpage (<https://www.michigan.gov/mpsc/commission/workgroups/2016-energy-legislation/capacity-demonstration>).

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission’s own motion,)	
to open a docket for load serving entities in)	
Michigan to file their capacity demonstrations as)	Case No. U-21775
required by MCL 460.6w.)	
_____)	

AFFIDAVIT OF [Name of Company Officer]

STATE OF MICHIGAN

COUNTY OF (County name)

[NAME of Company Officer], being duly sworn, states that the following information and attached exhibits are true and accurate to the best of his/her reasonable knowledge and belief, regarding [the company’s] satisfaction of its Michigan capacity demonstration requirements:

1. [Description of role and responsibilities within company]
2. [Overview of company]
3. [Overview of filing – if applicable for LSE, describe the load in each RTO, each local resource zone, and each service territory]
4. **Existing Generation - Owned** [Claim ownership of the unit(s), including a commitment of the unit(s) to LSE load in the applicable Michigan zone four years forward. (If this does not apply to your LSE, state that it is not applicable in planning year 20**-20**.)]
5. **Existing Demand Response or Energy Efficiency Resources (Not Netted Against Load)** [Outline the resource(s), including a commitment to maintain at least that same level of resources four years forward. If an AES has a LMR, describe how the transmission losses are applied in each service territory. (If this does not apply to your LSE, state that it is not applicable in planning year 20**-20**.)]
6. **Existing Demand Response or Energy Efficiency Resources (Netted Against Load)** [Outline what is netted against load, current programs, and how big these programs are.]
7. **New or Upgraded Generation – Owned** [Outline the detailed plans for the new generation including milestones such as planned in-service date, expected regulatory approval date(s), planned date to enter the MISO generator interconnection queue, expected date for MISO

generator interconnection agreement, construction timeline, etc. (If this does not apply to your LSE, state that it is not applicable in planning year 20**-20**.)]

8. **New Demand Response or Energy Efficiency Resources (Not Netted Against Load)** [Outline the plans for the resource(s), including a commitment to achieve and/or maintain at least that same level of resources four years forward. If an AES has a LMR, describe how the transmission losses are applied in each service territory. (If this does not apply to your LSE, state that it is not applicable in planning year 20**-20**.)]
9. **Existing Generation (Capacity Contract)** [Include a copy of the contract that specifies the unit(s) or pool of generation that is the source of the contract, including the location of the unit(s) or pool (can be filed confidentially) and state commitment to maintain the contract four years forward regardless of any early out clauses in the contract. In lieu of filing a copy of the contract(s), provide information set forth in the MPSC Order on Rehearing in Case No. U-18197, dated November 21, 2017, for Staff/Commission contract review. (If this does not apply to your LSE, state that it is not applicable in planning year 20**-20**.)]
10. **Forward ZRC Contracts** [Include a copy of the contract that specifies the zonal locations of the ZRCs. The affidavit should include a commitment to maintain the contract four years forward regardless of any early out clauses in the contract. In lieu of filing a copy of the contract(s), provide information set forth in the MPSC Order on Rehearing in Case No. U-18197, dated November 21, 2017, for Staff/Commission contract review. (If this does not apply to your LSE, state that it is not applicable in planning year 20**-20**.)]
11. **Planning Reserve Auction Purchases** (If this does not apply to your LSE, state that it is not applicable in planning year 20**-20**.)

NAME

SUBSCRIBED AND SWORN TO BEFORE ME on the ____ day of [month], [year].

Notary Public

My Commission Expires: _____

ALTERNATIVE ELECTRIC SUPPLIER LOAD SWITCHING AFFIDAVIT

State of _____

County of _____

[NAME], [title] of ("Receiving Supplier"), upon oath deposes and states that the following information is true and accurate to the best of his/her reasonable knowledge and belief:

("Receiving Supplier") will assume responsibility for an additional _____ MW in capacity peak load contribution values ("Additional PLC Value") associated with migrating customer load in _____ service territory for Planning Year 20** - 20**, over and above ("Receiving Supplier's") capacity demonstration obligation. ("Receiving Supplier") understands that the customer load reflected in this Additional PLC Value is currently the responsibility of ("Losing Supplier").

This Affidavit is being provided at the behest of the Michigan Public Service Commission Staff, in furtherance of implementation of Section 6w of Public Act 341.

NAME

SUBSCRIBED AND SWORN TO BEFORE ME on the _____ day of [month], [year].

Notary Public

My Commission Expires: _____

PROOF OF SERVICE

STATE OF MICHIGAN)

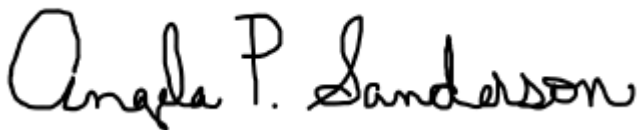
Case No. U-21775 *et al.*

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on August 21, 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 21st 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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