MPSC
MICHIGAN PUBLIC SERVICE COMMISSION

Capacity Demonstration Results

Planning Year 2029/30

Case No. U-21907

May 12, 2026

MPSC Staff

LARA
LICENSING AND REGULATORY AFFAIRS

Contents

Executive Summary

All Michigan load serving entities (LSE) required to file capacity demonstrations with the Michigan Public Service Commission (MPSC or Commission) for planning year 2029/30, pursuant to MCL 460.6w and the August 21, 2025 Commission Order in Case No. U-21907, have filed. MPSC Staff (Staff) has audited the filings, contracts, and other materials and finds that all Michigan LSEs have satisfied the capacity demonstration requirements and have procured appropriate levels of resources for planning year (PY) 2029/30.

Staff projects that the Midcontinent Independent System Operator, Inc. (MISO) Local Resource Zone (LRZ) 7, which consists of Michigan's lower peninsula and excludes the southwest corner of the state located in Indiana Michigan Power Company's (I&M) service territory, will have sufficient resources to meet its planning reserve margin requirements (PRMR) and local clearing requirements (LCR) in all four seasons for the compliance year (2029/30).[1] For MISO LRZ 1 and LRZ 2, the majority of which are in other states not subject to MCL 460.6w, Staff does not have sufficient detail to project the capacity positions of these zones. Staff projects that the I&M service territory in Michigan will have sufficient capacity to meet PJM Interconnection LLC's (PJM's) requirements for the prompt and compliance years.

The most recent Organization of MISO States (OMS)-MISO Resource Adequacy Survey (OMS-MISO Survey) of 2025,[2] which serves as a point-in-time analysis based on data collected during April 2025, provides a resource adequacy view over a five-year period (PY 2026/27 through PY 30/31). This year, the survey results separated potential new capacity from replacement/surplus capacity in the resource adequacy projections. For the Summer season, projections of potential new capacity, based off 3-year historical projections, increased to 3.5 GW/year from 2.3 GW/year in 2024. This was largely due to the exclusion of 2021, which had significantly lower build rates than surrounding years. The survey results project that MISO will have a 6.4 GW deficit to 10.5 GW surplus by Summer 2029, depending on the amount of potential new and replacement/surplus capacity that is able to be added each year. For the Winter season, the historical projections have decreased from 3.5 GW/year to 1.4 GW/year due to heavy reliance on solar additions, which have very low accreditation in winter (5% vs 50% accreditation in summer). The survey results project that MISO will have a 15.1 GW deficit to a 0.5 GW surplus by winter 2029/30. Fall ranges from a 2.5 GW deficit to a 14.6 GW surplus by fall 2029. Spring ranges from a 3.5 GW deficit to a 13.6 GW surplus. In addition, projections for each subregion in Summer and Winter were published, showing the North/Central subregion ranging from a 2.5 GW deficit to an 8.5 GW

[1] This projection is based on the filed capacity demonstrations and information from MISO available at the time of this report and is dependent on several variables including but not limited to: load growth, delays in completion of planned resources, and changes to MISO's resource adequacy construct.

[2] 2025 OMS-MISO Survey Results published June 6, 2025.

surplus in Summer 2029 and a 7 GW deficit to a 2.6 GW surplus in Winter 2029/30. The OMS-MISO Survey no longer projects future capacity positions for individual LRZs; however, the survey does show individual LRZ's potential to meet their LCR in each season of the prompt year. Both LRZ 1 and 2 show sufficient capacity to meet obligations in Planning Year 2025/26. New OMS-MISO Survey results for 2026 will be released June 4, 2026.

MISO's 2026/27 Planning Resource Auction (PRA) results indicated sufficient capacity at the regional, subregional, and zonal levels, with the summer price reflecting the highest risk and a tighter supply-demand balance. System-wide surplus (above the target Planning Reserve Margin or PRM) offered into the auction was 2.0 GW higher compared to last summer, even with a 2.7 GW increase in required capacity (Initial PRMR). The system-wide surplus capacity in the summer has increased from 2.6 GW in 2025 to 4.6 GW in 2026.

MISO noted in its 2026 PRA Results[3] that capacity offered into this year's auction has increased by as much as 4% in some seasons over last year. New capacity additions and more imports outweighed lower accreditation and retirements/suspensions, and MISO states that capacity additions need to continue to increase, given the expected demand growth from new large loads. MISO continues to reform its resource adequacy construct under the Reliability Imperative to address emerging risks due to fleet transition, new load additions, and retirements of dispatchable units.

[3] MISO 2026/27 PRA Auction Results

Background

On September 15, 2017, in Case No. U-18197, the Commission directed all Michigan LSEs to file capacity demonstrations annually, pursuant to MCL 460.6w. This report outlines the results of the capacity demonstrations filed for PY 2029/30, as directed by the Commission in Case No. U-21907, and represents the ninth annual capacity demonstration report. Prior year capacity demonstration reports can be found in the following dockets:

- 2021/22: Case No. U-18441
- 2022/23: Case No. U-20154
- 2023/24: Case No. U-20590
- 2024/25: Case No. U-20886
- 2025/26: Case No. U-21099
- 2026/27: Case No. U-21225
- 2027/28: Case No. U-21393
- 2028/29: Case No. U-21775

In Case No. U-21907, for the 2029/30 planning year, the Commission ordered[4] investor-owned utilities with one million or more customers[5] to file capacity demonstrations by February 24, 2026, investor-owned utilities with less than one million customers[6] to file by March 3, 2026, and alternative electric suppliers (AESs),[7] cooperatives (co-ops), and municipal utilities to file on or before March 17, 2026.

The purpose of these capacity demonstrations is to ensure that each electric utility owns or has contractual rights to capacity sufficient to meet its capacity obligations as set by the MISO, PJM, or the Commission, as required by MCL 460.6w.

Pre-Demonstration Process

As with previous years, Staff offered LSEs the opportunity to meet with Staff to discuss the capacity demonstration requirements and review relevant materials prior to the

---

[4] August 21, 2025 Order in Case No. U-21907.

[5] Consumers Energy Company, DTE Electric Company.

[6] Alpena Power Company, Indiana Michigan Power Company, Northern States Power Company-Wisconsin, Upper Michigan Energy Resources Corporation, and Upper Peninsula Power Company.

[7] AEP Energy Inc; American Rural Cooperative; BP Energy Retail Company, LLC; Calpine Energy Solutions LLC f/k/a Noble Americas Energy Solutions LLC; CMS ERM Michigan LLC; Constellation NewEnergy Inc; Dillon Power LLC; Direct Energy Services LLC; Energy Harbor LLC; Energy International Power Marketing Corporation; Energy Services Providers Inc.; Interstate Gas Supply LLC; Just Energy Solutions Inc; MidAmerican Energy Services LLC; Nordic Energy Services LLC; NRG Energy Inc. f/k/a Direct Energy Business, Texas Retail Energy; LLC, U.P. Power Marketing LLC; and Wolverine Power Marketing Cooperative Inc.

final filing deadlines. Several LSEs met with Staff remotely and clarified the process before filing reports in the docket. Staff found that the pre-filing consultations were helpful in resolving questions prior to filing. Staff will continue to offer pre-filing consultations each year to resolve potential issues prior to the filing deadlines.

Capacity Demonstration Filings

On or before February 24, 2026, capacity demonstration filings were received from DTE Electric Company and Consumers Energy Company. On or before March 3, 2026, capacity demonstration filings were received from Alpena Power Company, Indiana Michigan Power Company, Northern States Power Company, Upper Michigan Energy Resources Corporation (UMERC), and Upper Peninsula Power Company (UPPCO). Many LSEs filed confidential information under seal as part of the electric utilities' filings. Staff reviewed this information and met with LSEs as needed.

On or before March 17, 2026, capacity demonstration filings were received from American Rural Cooperative; Bayfield Electric; Calpine Energy Solutions, LLC.; City of Escanaba; City of Stephenson; City of Wakefield; Cloverland Electric Cooperative; CMS ERM; Constellation New Energy Inc.; Croswell Light and Power; Daggett Electric Department; NRG Energy f/k/a Direct Energy Business, LLC; Energy Harbor; Michigan Public Power Agency; Michigan South Central Power Agency (MSCPA); Newberry Water and Light Board; Union City Electric Department; Wolverine Power Supply Cooperative; and WPPI Energy.

Several AESs filed letters in Case No. U-21907 indicating that they are currently not serving customers in Michigan.[8]

All LSEs were able to procure the necessary capacity to demonstrate compliance for the current planning year in all four seasons. Staff conducted an audit for each capacity demonstration filing received and requested additional information from the LSEs when necessary. Staff has reviewed all contracts included in capacity demonstrations from AESs, as well as most of the contracts from co-ops, electric utilities, and municipalities. In addition to the required compliance year (PY 2029/30), most capacity demonstrations included updates for the 2026/27 planning year through the 2029/30 planning year. [9]

During this year's capacity demonstration, Alpena Power presented an alternative interpretation of the 5% limit on PRA acquisitions in the demonstration year. As shown

---

[8] AEP Energy Inc.; BP Energy Retail Company, LLC; Dillion Power LLC; Direct Energy Services LLC; Energy Services Providers, Inc.; Interstate Gas Supply LLC; Just Energy; Energy International Power Marketing; MidAmerican Energy Services LLC; Nordic Energy Services LLC; Texas Retail Energy, LLC; and UP Power Marketing.

[9] The required demonstrations for planning years 2027/2028 and 2028/29 were made in the 2024 capacity demonstration (Case No. U-21393) and the 2025 capacity demonstration (Case No. U-21775).

in the chart below, the planned capacity from the PRA for the Summer season is over 5% (8.3%) and the remaining seasons under 5%, so that the annual average or % of total requirements for the year was below 5% when adding all seasons together. Since the implementation of MISO's seasonal construct into the state capacity demonstration process, Staff has always interpreted the 5% limit for planned PRA purchases as 5% of each season's requirements (Initial PRMR). However, there is no specific language in the process and requirements document or the statute itself specifying that the 5% limit applies to each season individually. Staff recommends the Commission clarify the 5% limit on resources acquired from the PRA in the demonstration year to be a limit on total annual requirement or each seasonal requirement and direct Alpena to action if necessary.

	Capacity from PRA	PRMR (requirement)	%
Summer	5	60	8.33%
Fall	0	52	0%
Winter	0	48	0%
Spring	1	50	2.0%
Total	**6**	**210**	**2.9%**

The Order opening the docket in U-21907 directed all entities to file data for the prompt and interim years, as well as the compliance year. Most entities complied but some of the small municipal utilities continued to only provide information for the compliance year (PY 2029/30). For these entities, Staff was able to estimate the amount of capacity available for the prompt year and interim years by projecting the amount included for PY 2029/30 backwards for three years.

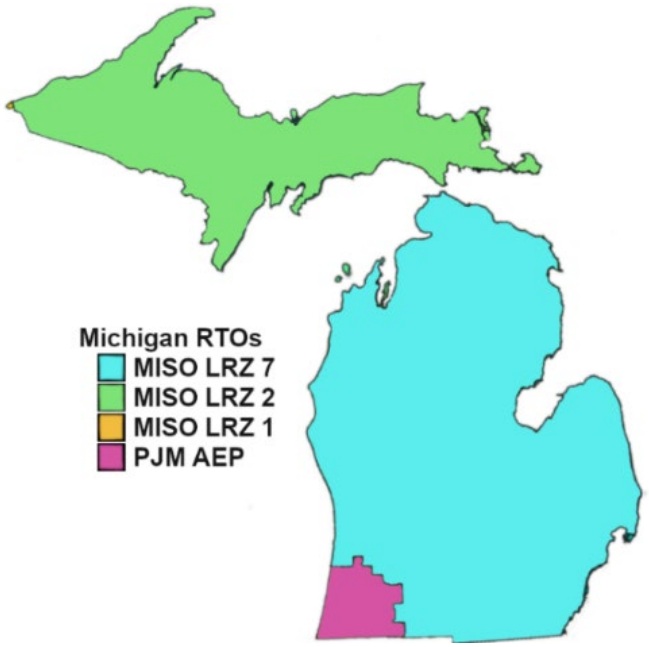
Staff recommends the Commission continue to direct all LSEs to include updated prompt year and interim year capacity obligation and resource information in future filings. Staff uses this information to help track changes in load and resources and to project the zonal resource adequacy more closely in these years. In addition, Staff recommends the Commission direct LSEs to provide MISO Module E Capacity Tracking (MECT) screenshots of their load obligations (PRMR/Peak Load Contribution (PLC)) to facilitate the Storage Target calculation used to comply with Public Act 235.[10]

[10] See January 23, 2025 Order in Case No. U-21571.

Overview of Zonal Adequacy

Michigan contains load that spans two regional transmission operators (RTOs): MISO and PJM. The majority of Michigan's load is located within MISO and is split between several LRZs. The exception is the Southwest corner of the Lower Peninsula, which is located within the PJM RTO through I&M's service territory. PJM and MISO have different resource adequacy constructs and capacity obligations. The different RTO regions in Michigan are illustrated in Figure 1.

Figure 1: RTO Zonal Regions in Michigan



MISO Resource Adequacy

Michigan LSEs serve load in MISO Local Resource Zones 1, 2, and 7. MISO's capacity construct is for the upcoming year (prompt year) only. LSEs must demonstrate sufficient resources to meet their current prompt year requirement four years forward to comply with MCL 460.6w.

MISO establishes capacity obligations for all LSEs based on peak load forecasts and a planning reserve margin percentage (PRM) necessary to meet the North American Electric Reliability Corporation's (NERC) 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, 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 MISO's resource adequacy construct, the Planning Reserve Margin Requirement (PRMR) and the Local Clearing Requirement (LCR) must be satisfied to meet the LOLE standard. The Initial 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.

The LCR is the minimum capacity required to be located within the zone to meet the LOLE standard, while accounting for the LRZ's ability to import. The LCR is for the entire zone, collectively, and not a requirement for individual LSEs; there is currently no LCR requirement applicable to individual LSEs in Michigan, pursuant to MCL 460.6w. The LCR is determined by performing a LOLE analysis on each zone, individually, to determine the Local Reliability Requirement (LRR) or the 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.

In PY 2023/24, 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. Staff reviewed these changes with participants in its 2022 and 2023 technical conferences as a part of the Commission's June 22, 2022 Order in U-21099, and results of these activities included requiring entities to file capacity demonstrations showing resources to meet obligations in all four seasons, modifications to the filing timeline, and adoption of ISO-neutral language into the process and requirements. Commencing PY 2024/25, the Commission's July 26, 2023 Order in U-21393 directed LSEs in MISO to demonstrate seasonal capacity obligations based on the MISO seasonal resource adequacy construct. LSEs are obligated to demonstrate enough capacity (owned or contracted) to meet that LSE's capacity obligation for each season.

In PY 2025/26, MISO's Reliability Based Demand Curve (RBDC) tariff revision implemented sloped demand curves into the PRA. The August 21, 2025 Order opening the docket in U-21907 directed LSEs to meet *Initial* Planning Reserve Margin Requirements for the capacity demonstration to clarify requirements after implementation of the sloped demand curves. The specific capacity obligation for each season will be the LSE's prompt year (upcoming year) Initial Planning Reserve Margin Requirement for each respective season.

Under the MISO resource adequacy construct, if an LRZ does not have sufficient resources to meet its seasonal requirements, the entire LRZ clears at the LRZ's seasonal Cost of New Entry (CONE) value. CONE varies from zone to zone and changes from year to year but, for reference, for 2026/27 the Annual CONE is $137,510/MW-year ($376.73/MW-day) in Zone 7.[11] The PRA clearing price being set at CONE would have economic ramifications and should provide a signal to entities with responsibilities regarding resource adequacy within the zone. However, it is important to note that MISO's resource adequacy construct is based on probabilistic determinations and failure to meet the requirements of the resource adequacy construct would not mean that the LRZ in question will experience a loss of load event. It simply means that the probability of such a loss of load event would exceed the generally accepted criteria that govern the resource adequacy planning process.

Details on MISO's Demand Response Tariff Revisions

MISO has recently filed or is currently working on Federal Energy Regulatory Commission (FERC) filings to address issues and challenges related to demand side resources, including Demand Response Participation Rules Enhancements, Elimination of Dual Registration, and Demand Response and Emergency Resource (DR/ER) reforms (formerly known as Load Modifying Resource or LMR reforms).

The demand response tariff revisions filed at FERC in 2025 include:

- ER25-1729 filed in March, which seeks to discourage nonexistent or overstated curtailments by requiring proof of contracts, as well as hourly meter data. In

[11] MISO 2026 PRA results

addition, this filing institutes reference levels for resources so that they cannot inflate their baselines. Accepted by FERC July 2025.

- ER25-2050 filed in April, which ends dual registration for load modifying resources also registered as emergency demand response. Accepted by FERC July 2025.
- ER25-2845 filed in July, requiring market participants registering demand resources to demonstrate demand reduction capability annually for each planning year. Accepted by FERC November 2025. Market participants can demonstrate demand reduction capability by:
    - Meeting MISO scheduling instructions in the prior Planning Year,
    - Conducting a Real Power Test, or
    - Submitting operational data or using an alternative mechanism to demonstrate demand reduction capability if unable to conduct a real power test or choose to waive the obligation and be subject to a higher financial penalty for non- or under-performance.
- ER25-1886 filed in April, which created fast and slow responding categories for demand resources, with faster resources receiving higher capacity accreditation, to take effect PY 2028/29. FERC deficiency letter requiring more information from MISO on the proposal's inner workings.
- ER26-148, which eliminated energy efficiency from the capacity auctions. Accepted by FERC December 2025.

LOLE Continuing Error & LOLE Definition Filing

During the 2025/26 Planning Year, MISO discovered a continuing software error in its LOLE calculations. Since the 2018/19 Planning Year, the software MISO uses in its LOLE modeling had been applying an *all hours* methodology instead of the Tariff-defined daily peak hour methodology. In instances of this type of error, the Tariff specifies a one-year look-back for financial adjustments. Adjustments were made for all four seasons of the 2025/26 Planning Year only, with over 80% of the $280 million financial impact falling in the summer season.

On August 27, 2025, MISO submitted a proposal to FERC to revise MISO's Module A Tariff definition of the term Loss of Load Expectation (ER25-3307), with an effective date of October 27, 2025. LOLE is currently defined as "the sum of the loss of Load probability for the integrated daily peak Hour for each Day of the year" and the proposal requests the definition be revised to "An estimate of the average number of days with supply interruption to end use customers, whether for a single hour or multiple hours in a day." This revision aligns the LOLE analysis with the Direct Loss-of-Load (DLOL) based methodology used to accredit resources and establish the Planning Reserve Margin MISO plans to implement in PY 2028/29.[12] This was accepted

[12] MISO Transmittal Letter in ER25-3307, pp. 3-4.

by FERC on October 24, 2025, and the all hours methodology was used in the PY 2026/27 Planning Year LOLE calculation.

Future Resource Adequacy Construct Changes

MISO aims to implement enhanced resource adequacy risk modeling and a DLOL accreditation methodology (FERC Docket ER24-1638, filed 3/28/2024) beginning in Planning Year 2028/29. MISO has committed to publishing indicative accreditation results based on the DLOL methodology prior to each Planning Resource Auction, starting with Planning Year 2025/26.[13] Two different Indicative PRM and accreditation values under DLOL were published in PY 2025/26 and another set was published in PY 2026/27. In addition, MISO's Futures reports include projected outyear accreditation values of resource classes.

The DLOL reforms will align the PRMR with accreditation of all resource classes. MISO continues its work on the PRMR allocation piece of the reforms; therefore, individual LSE's PRMR values under DLOL are not yet available. Some entities showed the impact of pending DLOL reforms in this year's filing, either voluntarily or as directed by Commission Order. The December 18, 2025 Order in Case No. U-21990 directed DTE Electric (the Company) to provide an updated analysis in its next capacity demonstration filing, showing the impact of the Customer on the Company's capacity requirements under DLOL using MISO's most recent indicative DLOL results. This separate analysis was filed alongside their standard capacity demonstration, as required by the Order. Staff recommends the Commission determine a timeline and guidelines to implement MISO's DLOL-based resource adequacy construct changes into the state capacity demonstration process, prior to MISO tariff changes effective PY 2028-29.

The compliance year (PY 2029/30) capacity obligations that are demonstrated for in this case are based off an LSE's prompt year (PY 2026/27) requirement. Changes to load, resources, and MISO procedures in the upcoming years can lead to discrepancies between an LRZ having sufficient capacity to meet its four-year forward Michigan requirements and not having enough capacity to meet MISO's requirements when the prompt year arrives.

MISO – Local Resource Zone 7

Figure 2 shows historical annual MISO capacity requirements for LRZ 7. This data is taken from the respective annual MISO LOLE Study Reports.

[13] Planning Year 2025-26 Indicative Direct Loss of Load (DLOL) Results published December 13, 2025. Planning Year 2025-2026 Indicative Direct Loss of Load (DLOL) Results published April 22, 2025. Planning year 2026-2027 Indicative DLOL-Based UCAP and PRMR Results published January 28, 2026.

Figure 2: Annual MISO LOLE Report Data LRZ 7

Planning Year	Source	LRR[14]	CIL[15]	LCR (ZRCs)[16]
2013/14	MISO 2013 LOLE Report	25,305	4,576	20,729
2014/15	MISO 2014 LOLE Report	24,815	3,884	20,931
2015/16	MISO 2015 LOLE Report	24,710	3,813	20,897
2016/17	MISO 2016 LOLE Report	24,715	3,813	21,309
2017/18	MISO 2017 LOLE Report	24,654	3,320	21,334
2018/19	MISO 2018 LOLE Report	24,545	3,785	20,760
2019/20	MISO 2019 LOLE Report	24,845	3,211	21,634
2020/21	MISO 2020 LOLE Report	25,370	3,200	22,170
2021/22	MISO 2021 LOLE Report	25,054	4,888	20,166
2022/23	MISO 2022 LOLE Report	24,115	3,749	20,366
2023/24[17]	MISO 2023 LOLE Report	24,428	5,087	19,341
2024/25	MISO 2024 LOLE Report	24,558	4,500	19,271
2025/26	MISO 2025 LOLE Report	23,250	3,569	19,681
2026/27	MISO 2026 LOLE Report	23,154	4,628	18,526

These numbers typically change slightly between the LOLE Study and the PRA, primarily due to updated load forecasting used in the PRA but can be used to see how local capacity requirements have changed over time. Changes in these requirements can have economic and reliability impacts and will continue to be monitored. In its seasonal construct, MISO includes an LRR, ZIA, and PRMR for each zone for each season. The difference between a zone's PRMR and its LCR is sometimes referred to as Effective Capacity Import Limit (ECIL). The ECIL is not a MISO defined term and is not representative of a physical import limitation. To meet the loss of load standard and avoid the auction clearing price being set at CONE, a zone must have enough resources located within the zone to meet its LCR, even if the LCR exceeds the PRMR. Historically, Michigan utilities have assumed a CIL of approximately 3200 MW for input in capacity expansion modeling conducted during the development of Integrated Resource Plans and other planning exercises.

[14] **Local Reliability Requirement**. Representative of the resources required for LRZ 7 to meet the LOLE standard when modeled as an island (no imports). MISO Loss of Load Expectation Study Report, Tables 2-1 through 2-4.
[15] **Capacity Import Limit**. Representative of the ability of an LRZ to import capacity from areas outside of that LRZ. MISO Loss of Load Expectation Study Report, Tables ES-3 through ES-6.
[16] **Local Clearing Requirement**. Representative of the minimum resources that must be located within a specific zone for that zone to meet the reliability standard. Calculated as shown in Table 1.1 of MISO Loss of Load Expectation Study Report.
[17] Values for summer season starting Planning Year 2023/24. Other seasons shown in Appendix B.

Figure 3 shows a comparison of LRZ 7 aggregated resources demonstrated, plus known undemonstrated resources likely to still be available, for each season in the 2029/30 planning year and MISO's resource adequacy requirement for PY 2026/27. Appendix B contains seasonal capacity position tables for the prompt, interim, and demonstration years. These numbers represent Staff's current projection based on the capacity demonstration filings and MISO publications at the time of this report, although the information is subject to change for all forward years. Unless otherwise noted, resources and resource requirements in this report are in Unforced Capacity (UCAP) Megawatts (MW), equal to Zonal Resource Credits (ZRCs).

Figure 3: U-21907 Results – PY 2029/30 LRZ 7 Capacity Position (ZRCs)

Line #		Summer	Autumn	Winter	Spring
1	Planning Reserve Margin Requirements (PRMR)	21,004	19,287	15,627	19,625
2	Local Reliability Requirement (LRR)	22,025	21,326	18,812	20,481
3	Capacity Import Limit (CIL)	4,628	5,193	4,123	5,338
4	Zonal Import Ability (ZIA)	4,628	5,193	4,123	5,338
5	Local Clearing Requirement (LCR) (L1-L4)	17,397	16,133	14,689	15,143
6	Total Owned	18,709	17,927	15,992	18,508
7	Total PPA Contracts	5,624	5,451	3,932	5,777
8	Total ZRC Contracts	1,104	1,133	884	1,175
9	Total Qualified Demand Response	1,325	561	538	660
10	Total Resources (sum of L6 through L9)	26,762	25,072	21,346	26,119
11	LCR Demonstrated Position (L10-L5)	9,365	8,939	6,657	10,976
12	PRMR Demonstrated Position (L10-L1)	5,758	5,785	5,718	6,494
13	Net Undemonstrated Capacity	-84	-119	37	-171
14	Anticipated LCR Position (L11+L13)	9,281	8,820	6,694	10,805
15	Anticipated PRMR Position (L12+L13)	5,674	5,666	5,755	6,323

(1) PY 2026 PRMR from PRA Data and held constant at prompt year value.

(2) PY 2026 LRR from PRA Data and held constant at prompt year value (LRR=LCR+ZIA).

(3) PY 2026 CIL from PRA Data and held constant at prompt year value.

(4) PY 2026 LCR from PRA Data and held constant at prompt year value.

(5-9) Zone 7 resources included in capacity demonstrations sorted by resource type.

(10) LCR position based on demonstrated resources only.

(11) PRMR position based on demonstrated resources only.

(12) Net Undemonstrated Zone 7 Capacity is Staff's attempt to reconcile the capacity demonstration resources with the MISO PRA. There are resources located in Zone 7 that Staff anticipates will be in the PRA that were not included in any capacity demonstration as well as a small number of resources included in the capacity demonstration that are no longer available due to recent events.

(13) LCR Position after accounting for undemonstrated Zone 7 Capacity.

(14) PRMR position after accounting for undemonstrated Zone 7 capacity. A negative value means the Zone will need to import resource to meet its requirement. A positive value means the Zone may import resources based on economics but will not need to meet its PRMR.

Prompt Year (PY 2026/27) and Compliance Year (PY 2029/30)

For the prompt year (PY 2026/27), based on the PRA Results posted April 28, 2026,[18] LRZ 7's summer Initial PRMR is 19,625 ZRCs and the LCR is 15,143 ZRCs. The total LRZ 7 resources offered in the PRA for the summer season in the prompt year is 20,721 ZRCs, which exceeds the LCR by 5,578 ZRCs and the Initial PRMR by 1,096 ZRCs. Other seasons' data is shown in Appendix B.

The final PRMRs, as determined through auction clearing, were greater than the initial targets (Initial PRMRs) in all seasons. In other words, the auction cleared above seasonal reliability targets, representing additional reliability value at cost-competitive prices. The "effective" PRMs are calculated from the Final PRMRs (determined by auction clearing):

2025 PRA Results	Initial PRM	Final PRM
Summer	7.9%	11.4%
Fall	11.6%	17.3%
Winter	18.9%	23.1%
Spring	23.4%	28.1%

Based on the resources included in the capacity demonstration filings for PY 2029/30, Staff projects LRZ 7 to have a surplus of resources compared to the projected LCR in all four seasons, as shown in Figure 3. It is important to note that these projections are subject to change. A few examples of things that could change include load forecasts, availability and performance of existing resources, development of planned new resources, and MISO policies and practices. MISO's transition to a Direct Loss of Load (DLOL) Resource Adequacy construct in Planning Year 2028/29 is expected to significantly change the requirements and accreditation of resources.

MISO has previously provided projections of both PRMR and LRR into the compliance year from the prompt year. These calculations were not available to Staff at the time of its report. In the absence of the projected PRMR/LRR values, Staff has assumed these values remain constant for the purposes of this comparison.

Interim Years (PY 2027/28 & PY 2028/29)

Appendix B also includes data and projections for each season in the interim years, PY 2027/28 & PY 2028/29. This information is derived using the same methodology as described for the compliance year. Comparing those projected requirements to the demonstrated and undemonstrated resources in LRZ 7, results in a capacity surplus for both years compared to the projected LCRs. This information is based on the best information currently available to Staff, but it

[18] Planning Resource Auction Results for Planning Year 2026/27 published April 2026.

includes several assumptions and, again, is subject to change. Similar to the compliance year, likely changes include new forecasts, unknown resource additions or subtractions, changes in generator performance, increased or decreased zonal import ability, seasonal variability, and/or changes to MISO requirements.

MISO – Local Resource Zone 2

MISO's LRZ 2 encompasses almost the entire upper peninsula of Michigan, as well as northern and eastern Wisconsin. MISO LRZ 2 has seasonal CILs of 5,072 MWs in Summer, 6,050 MWs in Fall, 5,379 MWs in Winter, and 6,133 MWs in Spring.[19] MISO does not define MW capacity import or export limits between states within the boundaries of the same LRZ. Considering LRZ 2 includes LSEs from Wisconsin (not subject to MCL 460.6w), the data available to Staff for LRZ 2 from capacity demonstration filings is not comprehensive enough to project a zonal capacity position, as Staff did in its analysis of LRZ 7. Nevertheless, all Michigan LSEs serving load within MISO LRZ 2 demonstrated sufficient resources to meet their requirements.

The 2026 MISO PRA results indicate an installed capacity surplus in the 2026/27 planning year for LRZ 2.[20]

MISO – Local Resource Zone 1

A very small fraction of Michigan's upper peninsula load is located in LRZ 1. Northern States Power, Bayfield Electric Cooperative, and the City of Wakefield municipal utility combined have less than 31 MW of peak demand in MISO LRZ 1. All LSEs in LRZ 1 demonstrated sufficient capacity to meet their obligations for PY 2029/30. The 2026/27 MISO PRA results show sufficient capacity for each season in the 2026/27 planning year for LRZ 1.

[19] Planning Resource Auction Results for Planning Year 2026/27 published April 2026.
[20] *Id.*

PJM Resource Adequacy

A few LSEs in Michigan serve load within the PJM RTO. These LSEs are still subject to the requirements of MCL 460.6w requiring sufficient capacity for four years forward in planning year 2029/30. PJM LSEs demonstrate sufficiency by providing evidence that the LSE complies with its PJM obligations.

LSEs in the PJM service territory must meet capacity obligations either through participation in PJM's Reliability Pricing Model (RPM) Base Residual Auction (BRA) or through PJM's Fixed Resource Requirement (FRR) plan. The FRR plan is an alternative to the RPM, where an LSE must demonstrate to PJM that it has enough resources to cover its projected load plus an additional reserve requirement. Both the RPM and the FRR resources are subject to monetary penalties if they fail to maintain PJM's reliability standard. PJM's resource adequacy construct is based on annual requirements.

The largest LSE operating in Michigan in PJM is Indiana Michigan Power Company (I&M or the Company).[21] I&M elects to file an FRR plan each year. I&M's most recent capacity demonstration indicates that the Company plans to continue with the PJM FRR plan, barring any major FERC-ordered changes. Staff reviewed I&M's filing and finds that they have sufficient resources to meet its obligations at PJM.

In addition to I&M's capacity demonstration, Staff also reviewed information of cooperative and municipal utility obligations in the Michigan portion of PJM's territory for PY 2029/30. The results are displayed in the table below.

Figure 4: PJM Capacity Demonstration Summary

Item	PY 2026/27	PY 2027/28	PY 2028/29	PY 2029/30
Utility Total Planning Resources, MW	4541	4846	5480	6335
Other PJM Resources, MW	360.5	356.6	406.6	456.6
Total PJM Resources, MW	4901.5	5202.6	5886.6	6791.6

Staff expects that the LSEs in the Michigan portion of PJM will continue to meet the PJM capacity obligations, based on information included in individual capacity demonstrations. If PJM LSEs were to encounter an unanticipated shortfall in the immediate future, Staff expects that it would be accommodated through the procurement of reserve resources by market purchases. As market conditions may

[21] Indiana Michigan Power Company is an electric operating company of American Electric Power Company, Inc. (AEP). I&M is a wholly owned subsidiary of AEP and is operated as a single utility in the American Electric Power System (AEP System).

change over time, Staff will continue to monitor the resource adequacy of the PJM region and the capacity plans of Michigan LSEs located within the PJM territory.

The Commission Order in Case No. U-16090 set I&M's customer choice cap amount to zero, and it was subsequently reset to ten percent on February 1, 2019, pursuant to the Commission Order and MCL 460.10a(1)(c). On February 1, 2019, I&M began enrolling customers in its customer choice program and is now fully subscribed at the cap. Currently, I&M is responsible for the capacity of its customer choice load in its FRR plan, under the PJM Reliability Assurance Agreement (RAA). If suppliers were to choose to self-supply capacity, then that capacity would also need to be included in I&M's FRR plan.

In addition, I&M currently has an application before the Commission, in Case No. U-21968, for the ex parte accounting authority to change the methodology for allocating between Indiana and Michigan retail jurisdictions the costs of current generation resources.

The North American Electric Reliability Corporation's (NERC) 2025 Long-Term Reliability Assessment categorizes PJM as having elevated risk level post 2026 and high-risk post 2029, with resource additions not keeping up with generator retirements and demand growth, though recently approved generating resources with expedited interconnection were not included in the risk analysis.[22]

The PJM Base Residual Auction (BRA) schedule has experienced delays awaiting FERC action on capacity auction related issues. The following timeline shows the published BRA schedule of auctions, with annual auctions held each May subsequently:

- June 2026 2028/29 BRA
- December 2026 2029/30 BRA
- May 2027 2030/31 BRA

PJM introduced a more robust risk model, while simultaneously implementing the Effective Load Carry Capability (ELCC) accreditation methodology for all assets in PY 2025/26. Two capacity auctions were conducted in the last year, the 2026/27 BRA and the 2027/28 BRA. PJM enforced a cap and floor on the Variable Resource Requirement (VRR) curve for both auctions, and both auctions resulted in clearing at the maximum price across all zones. The 2026/27 BRA cleared at $329.17/MW-day and secured enough capacity to meet the reliability requirement by a very narrow margin. The 2027/28 BRA cleared at $333.44/MW-day and fell short of the reliability target, resulting in a 14.4% reserve margin rather than the 20% target reserve margin. Subsequent to the BRA, an updated forecast for Summer 2027 reduced the peak load forecast by approximately 4 GW, reducing the shortfall from 6.6 GW to approximately 2.6 GW.

[22] NERC 2025 Long Term Reliability Assessment

Recent changes to PJM's capacity market include implementing a cap and floor on the VRR curve; removing renewable exemptions forcing wind, solar, and battery storage with Capacity Interconnection Rights (CIRs) to participate in the auction; accreditation reforms (E3); and significantly increased accreditation for demand response (DR), driven by increased required DR availability to all hours and revised winter peak load calculations.

LSE Capacity Demonstration Results (PY 2029/2030)

Staff appreciates the time and effort made by all Michigan LSEs to comply with the provisions of MCL 460.6w, as well as to comply with the questions, audits, contract reviews, and requests for additional information throughout this process. The LSE capacity demonstration results are reported for PY 2029/2030 because, following the initial capacity demonstration which covered four years, only the fourth year forward is required for compliance. As previously described in its September 15, 2017 Order in Case No. U-18197, the Commission requested a table be included in this report that identifies the capacity by type for each individual electric provider, without revealing the identity of any specific electric provider. The requested table, with a breakdown for each electric provider that filed a capacity demonstration, is included as Appendix A. In addition to the breakdown by individual supplier, Staff reports the following aggregate results in Figure 5 below.

Figure 5: Resource Breakdown (%) by Supplier Type Planning Year 2029/30 - Summer

Supplier Type	Owned	DR	Contract – PPA	Contract - ZRC	Auction
Muni/Co-Op Aggregate	62.5%	0.3%	25.6%	8.9%	2.8%
AES Aggregate	0.5%	0.2%	2.5%	96.8%	0.0%
Utility Aggregate	63.5%	6.3%	21.4%	4.0%	4.8%

Demand Response

As part of its analysis, Staff reviewed the LSEs' DR programs as an optional source of capacity. When used by a LSE, a reduction in demand through DR programs offsets a portion of their capacity needs. LSEs can utilize interruptible DR during critical peak times to quickly respond to bulk electric system needs, which can delay future capital investment in new generation. Behavioral DR programs allow the utility to lower its peak demand forecast, thus mitigating the need for an equal of amount supply side resources.

Demand response played a prominent role in LSEs' integrated resource plan filings, where DR is required to be considered along with traditional supply side resources for meeting capacity needs. MCL 460.6t directs Staff to complete a statewide study of DR potential in Michigan every five years, and the most

current Michigan Demand Response Potential Study was issued on October 17, 2025.[23] In addition, the Commission approved Michigan Integrated Resource Planning Parameters on December 18, 2025 in Case No. U-21867 that include provisions regarding including DR options in future integrated resource plans.

The DR levels assumed in both Consumers Energy's and DTE Electric's current integrated resource plans[24] are reflected in their capacity demonstration filing. Staff will continue to monitor these plans and the use of DR in Michigan for the foreseeable future.

Demand Response Aggregation

Pursuant to the September 15, 2017 Order in Case No. U-18369, the Commission affirmed that AESs may offer DR programs to their customers through a curtailment service provider (CSP) or third-party aggregator. The Commission made this determination in the context of finding that it will continue to review DR programs offered by AESs as part of the capacity demonstration process.

As the Relevant Electric Retail Regulatory Authority (RERRA), the Commission is aware of aggregation of approximately 115 ZRCs of DR offered into the 2026 MISO capacity market. Staff continues to work with CSPs, aggregators of retail customers (ARCs), and MISO to ensure that aggregated DR's load modifications are accounted for when dispatched on MISO's coincident peak and continues to monitor the discussions taking place regarding FERC Order 2222.

ZRC Contracts

Staff recommended that forward ZRC contracts that are used for capacity demonstration purposes specify delivery of the ZRCs in the MISO Module E Capacity Tracking (MECT) tool prior to the applicable PRA auction. This year's demonstration shows an increase in the percentage of ZRC contracts utilized this year by the utilities, municipal utilities, and cooperatives compared to last year.

An important thing to note is that ZRCs are defined in MISO's tariff and are created in the prompt year when UCAP 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 visibility into the source and transfers of those ZRCs that occur prior to the PRA in the prompt year, and those

---

[23] 2025 Energy Waste Reduction, Demand Response, and Efficient Electrification Statewide Potential Study, NV5/Slipstream, October 17, 2025.

[24] DTE's current IRP filed and approved in MPSC Case No. U-21193.
CE's current IRP filed in MPSC Case No. U-21090.

ZRC transfers are audited by Staff as a secondary check on the ZRC contracts utilized in the capacity demonstrations.

At this point in time, the overall amount of ZRC contracts included in capacity demonstration filings do not impact Staff's ability to continue to make forward resource adequacy projections on a zonal basis. Staff will continue to monitor and audit ZRC contracts and ZRC transfers within the MECT going forward.

AES Load Switching

Staff requested that any AES who experienced load switching during this time provide a signed affidavit confirming the increase or reduction in their load compared to the PLC data provided by the utility with their capacity demonstration that contained the amount of load switching for each planning year. Each supplier contracting for additional customer load provided a copy of its affidavit confirming this transaction to the supplier that was losing the load to be accounted for in both suppliers' demonstrations. The load switching process was made more complex with the change to a seasonal construct.

Staff continues to see a large amount of load switching among entities. To better organize and facilitate the filing process, Staff continues to recommend that filing entities who include load switching information in their filing include it within the Contracted Resources 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 filings, so Staff is able to easily cross check that the load is being accounted for.

Capacity Retirements and Additions

The state of Michigan continues to follow national trends showing a tightening capacity position due to the scheduled retirements outpacing the buildout of replacement capacity. Staff had the opportunity to meet with several LSEs to discuss their filings and many expressed concerns about the dwindling amount of capacity available in the compliance year, especially season-specific contracts and bilateral contracts in general. Various factors could cause delays for new additions, including broad economic factors such as supply chain constraints, labor shortages, high component prices, etc., as well as delays associated with obtaining permitting, regulatory approval, or interconnection queue delays. MISO continues to experience significant interconnection queue delays. Phase II results are expected for the 2022 cycle in May 7, 2026. The 2023 cycle is expected to enter phase II in September 2026. The 2025 cycle is expected to enter phase II when the 2023 cycle is sufficiently advanced (MISO opted to forgo a 2024 cycle).

In an effort to reduce interconnection queue congestion, MISO filed to revise its Tariff (see FERC Docket Nos. ER25-2454 & ER25-1674) to amend its generator interconnection procedures (GIP) in order to establish the Expedited Resource Addition Study (ERAS) process to provide a framework for the accelerated study

of generation projects that can address resource adequacy and reliability needs within the MISO footprint in the near term. The Commission approved the process for addressing requests filed pursuant to MISO's ERAS in the August 7, 2025 Order in Case. No. U-21902.

The tightening capacity position 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. The current capacity demonstration process does not require LSEs to consider load growth in the four year forward requirement. In light of recent increases in large load additions anticipated in Michigan, Staff recommends the Commission consider including any load growth that would significantly impact an LSE's ability to serve that load in future capacity demonstration filings (see next section for more detail).

A portion of the capacity from the Palisades Nuclear Power Plant (Palisades) was included as demonstrated capacity starting in Spring 2026. The remainder of the capacity from Palisades is being contracted by an LSE in Indiana. However, all the capacity from Palisades would provide resource adequacy benefits to MISO LRZ 7 and be counted towards meeting the LCR for LRZ 7. Re-opening of this plant is conditional on approval from the Nuclear Regulatory Commission (NRC).

In addition to the capacity resources demonstrated in this year's capacity demonstration case, the J.H. Campbell Generation Station (J.H. Campbell) is currently operating as required under the Department of Energy's 202c emergency order. J.H. Campbell is not a MISO-registered capacity resource and therefore cannot be counted as capacity toward meeting resource adequacy targets. When operating, the energy from these units is supplied into the MISO energy market.

Load Growth and the Four Year Forward Requirement

Over the past year and a half, the single largest issue in U.S. electricity markets has been forecasted load growth in all U.S. electricity markets, including MISO. This increase in load has been driven primarily by large spot-load additions, primarily data centers, and, to a lesser degree, reshoring of manufacturing, building electrification, and transportation electrification.

MISO's 2026 Long-Term Load Forecasting (LTLF) Results Summary[25] (2026 Load Forecast) shows rising electricity demand forecasts, as well as continued change in the resource mix. The 2026 Load Forecast shows increasing demand, compared with the prior forecast driven by gigawatt-scale data center campuses, higher rack power densities from Artificial Intelligence (AI) compute, and accelerated investment in strategic domestic compute infrastructure. The

[25] 2026 Long-Term Load Forecasting (LTLF) Results Summary

forecast for industrial demand is also increasing, driven by domestic semiconductor fabrication, battery manufacturing plants, and industrial electrification. In addition, MISO's 2026 LTLF Results Summary showed slightly reduced growth expectations for electrification & distributed energy resources (DERs) (Electric Vehicles (EVs), Heat Pumps, Water Heaters, and Rooftop Photovoltaic (PV)). The overall annual growth rate in the 2026 LTLF increased to 2%, up from 1.6% in the 2024 LTLF, and the current trajectory is in-line with the high end of the 2024 LTLF. The forecasted load growth in Michigan is reflective of national and regional trends, and large load tariffs and special contracts applications to the Commission have increased over the past year (see Case Nos. U-21990, U-21859, U-21986, and U-22058).

MCL 460.6w requires electric providers to demonstrate sufficient capacity to cover their obligations. When this statute was implemented, entities' demonstration year capacity obligation was equal to the prompt (current) year peak load forecast multiplied by the PRM% forecasted for year four (as published in the most recent MISO LOLE Study Report). After changes to MISO's resource adequacy construct introducing seasonal requirements, the Commission endeavored to change the state capacity demonstration to better align with the MISO construct, and one of the changes implemented was to stop using projected PRM%. After changes were implemented, demonstration year capacity obligations changed to the entity's prompt year peak load forecast multiplied by the prompt year PRM%. The peak load forecast for the prompt year has always been part of the requirement; however, the process allows an entity with a higher forecasted load in the compliance year to include this load in their demonstration (but not lower than current year forecast). Although this is included in the process and requirements document, it is unclear how Staff and the Commission would evaluate a filing from a provider who fell short of their requirement if it is based on a higher peak load forecast than the current year's forecast. Case No. U-21775 included such cases, and Staff evaluated each filing based on the current (prompt) year peak load forecast with the PRM% applied. Further guidance would be welcomed on this matter, since load is forecasted to grow increasingly in the coming years.

The current capacity demonstration process requires electric providers in MISO to demonstrate capacity for four years forward using *current* year capacity obligations, as given by MISO. Although the original process required entities to demonstrate to future forecasted levels of need, using a forecasted PRM% from MISO's LOLE Study Report, revision of the requirements in 2022 resulted in the current requirements of the prompt year PRM% for all four years. The capacity demonstration has always allowed entities to use their prompt year load forecast for all four years of the demonstration (with future year PRM% applied when this was valid) or they can use a forward-looking forecast if their forecast is higher than the prompt year requirements. While the current requirements show that electric providers can meet their current obligations, it negates any additional

obligation driven by load growth in their territory and does not *require* them to consider incremental load growth in the four year forward demonstration. A significant amount of load growth unaccounted for in the capacity demonstration process could be problematic and may conflict with the purpose of Section 6w of Act 341.

Staff recommends the Commission consider including load growth that would significantly impact an LSE's ability to serve that load in future capacity demonstrations. One possible solution is to set a forecasted threshold quantity or percentage load growth that, when triggered, electric providers would be obligated to demonstrate sufficient capacity to meet projected obligations. These projections/forecasts should reflect the most updated customer contracts, and, for investor-owned utilities, align with the forecasted load in their most recent Integrated Resource Plan (IRP).

Conclusion and Recommendations

All Michigan LSEs required to file capacity demonstrations with the Michigan Public Service Commission for planning year 2029/30, pursuant to MCL 460.6w and the August 21, 2025 Commission Order in Case No. U-21907, have filed. Staff audited the filings, contracts, and other materials and found that all Michigan LSEs have satisfied the capacity demonstration requirements and have procured appropriate levels of resources for planning year 2029/30.

Staff appreciates the cooperation of all Michigan LSEs with respect to this process and the willingness to provide data and answer questions necessary for Staff to complete its review.

A summary of recommendations included in this report is below:

1. Staff recommends the Commission determine a timeline and guidelines to implement MISO's DLOL-based resource adequacy construct changes into the state capacity demonstration process prior to MISO tariff changes effective PY 2028/29.
2. Staff recommends the Commission clarify the 5% limit on resources acquired from the PRA in the demonstration year to be a limit on total annual requirement or each seasonal requirement and direct Alpena to action accordingly.
3. Staff recommends the Commission consider including load growth that would significantly impact an LSE's ability to serve that load in future capacity demonstrations.
4. 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.

5. Staff recommends the Commission direct all LSEs to provide MECT screenshots of their prompt load obligations (PRMR/PLC) to facilitate the Storage Target calculation used to comply with Public Act 235.
6. Staff recommends that filing entities who include load switching information in their filing include it within the Contracted Resources 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 filings, so Staff can cross check that the load is being accounted for.

Appendix A

Planning Year 2029/30 Resource Breakdown (%) by Individual Supplier[26]

LSE	Owned	DR	Contract - PPA	Contract - ZRC	Auction
Supplier 1	34%	0%	66%	0%	0%
Supplier 2	0%	0%	0%	100%	0%
Supplier 3	0%	0%	100%	0%	0%
Supplier 4	0%	0%	0%	100%	0%
Supplier 5	54%	7%	39%	0%	0%
Supplier 6	60%	0%	18%	17%	5%
Supplier 7	0%	0%	0%	100%	0%
Supplier 8	55%	45%	0%	0%	0%
Supplier 9	0%	0%	0%	100%	0%
Supplier 10	0%	0%	0%	100%	0%
Supplier 11	0%	0%	0%	100%	0%
Supplier 12	9%	7%	84%	0%	0%
Supplier 13	0%	0%	100%	0%	0%
Supplier 14	0%	0%	100%	0%	0%
Supplier 15	43%	3%	6%	16%	32%
Supplier 16	0%	0%	100%	0%	0%
Supplier 17	0%	0%	0%	100%	0%
Supplier 18	85%	5%	10%	0%	0%
Supplier 19	66%	0%	35%	-2%	0%
Supplier 20	83%	5%	13%	0%	0%
Supplier 21	42%	22%	35%	0%	0%
Supplier 22	58%	8%	29%	5%	0%
Supplier 23	100%	0%	0%	0%	0%
Supplier 24	0%	0%	0%	100%	0%
Supplier 25	0%	0%	0%	100%	0%

[26] Suppliers (municipal and cooperative electric utilities) that combined their capacity resources are shown as one supplier in the above figure. The total number of suppliers may vary from year to year based on changes to which suppliers combine their capacity demonstrations, as well as new suppliers or suppliers no longer serving load in Michigan.

Appendix B

U-21907 Results - LRZ 7 Summer Capacity Position (ZRCs)					
Line #	Summer Values	PY 2026	PY 2027	PY 2028	PY 2029
1	Planning Reserve Margin Requirements (PRMR)	21004	21004	21004	21004
2	Local Reliability Requirement (LRR)	22025	22025	22025	22025
3	Zonal Import Ability (ZIA)	4628	4628	4628	4628
4	Local Clearing Requirement (LCR)	17397	17397	17397	17397
5	Total Owned	16604	17561	18175	18709
6	Total PPA Contracts	3160	4187	4700	5624
7	Total ZRC Contracts	774	940	860	1104
8	Total Qualified Demand Response	1194	1324	1294	1325
9	Total Resources (Line 5 + Line 6 + Line 7 + Line 8)	21732	24012	25029	26762
10	LCR Demonstrated Position (Line 9 - Line 4)	4336	6615	7633	9365
11	PRMR Demonstrated Capacity Position (Line 9 - Line 1)	728	3008	4025	5758
12	Net Undemonstrated Zone 7 Capacity	200	-28	160	-84
13	Anticipated LCR Position (Line 10 + Line 12)	4535	6588	7792	9281
14	Anticipated PRMR Capacity Position (Line 11 + Line 12)	928	2981	4185	5674
(1) PY 2026 PRMR from PRA Data and held constant at prompt year value.					
(3) PY 2026 ZIA from PRA Data and held constant at prompt year value.					
(4) PY 2026 LCR from PRA Data and held constant at prompt year value.					
(5-9) Zone 7 resources included in capacity demonstrations sorted by resource type.					
(10) LCR position based on demonstrated resources only.					
(11) PRMR position based on demonstrated resources only.					
(12) Net Undemonstrated Zone 7 Capacity is Staff's attempt to reconcile the capacity demonstration resources with the MISO PRA. There are resources located in Zone 7 that Staff anticipates will be in the PRA that were not included in any capacity demonstration as well as a small number of resources included in the capacity demonstration that are no longer available due to recent events.					
(13) LCR Position after accounting for undemonstrated Zone 7 Capacity.					
(14) PRMR position after accounting for undemonstrated Zone 7 capacity. A negative value means the Zone will need to import resource to meet its requirement. A positive value means the Zone may import resources based on economics but will not need to meet its PRMR.					

U-21907 Results - LRZ 7 Autumn Capacity Position (ZRCs)					
Line #		PY 2026	PY 2027	PY 2028	PY 2029
1	Planning Reserve Margin Requirements (PRMR)	19287	19287	19287	19287
2	Local Reliability Requirement (LRR)	21326	21326	21326	21326
3	Zonal Import Ability (ZIA)	5193	5193	5193	5193
4	Local Clearing Requirement (LCR)	16133	16133	16133	16133
5	Total Owned	16356	17757	18105	17927
6	Total PPA Contracts	2970	4058	4525	5451
7	Total ZRC Contracts	784	918	699	1133
8	Total Qualified Demand Response	581	589	556	561
9	Total Resources (Line 5 + Line 6 + Line 7 + Line 8)	20690	23323	23885	25072
10	LCR Demonstrated Position (Line 9 - Line 4)	4557	7189	7752	8939
11	PRMR Demonstrated Capacity Position (Line 9 - Line 1)	1403	4036	4598	5785
12	Net Undemonstrated Zone 7 Capacity	195	-22	313	-119
13	Anticipated LCR Position (Line 10 + Line 12)	4752	7167	8065	8820
14	Anticipated PRMR Capacity Position (Line 11 + Line 12)	1599	4013	4911	5666

(1) PY 2026 PRMR from PRA Data and held constant at prompt year value.

(3) PY 2026 ZIA from PRA Data and held constant at prompt year value.

(4) PY 2026 LCR from PRA Data and held constant at prompt year value.

(5-9) Zone 7 resources included in capacity demonstrations sorted by resource type.

(10) LCR position based on demonstrated resources only.

(11) PRMR position based on demonstrated resources only.

(12) Net Undemonstrated Zone 7 Capacity is Staff's attempt to reconcile the capacity demonstration resources with the MISO PRA. There are resources located in Zone 7 that Staff anticipates will be in the PRA that were not included in any capacity demonstration as well as a small number of resources included in the capacity demonstration that are no longer available due to recent events.

(13) LCR Position after accounting for undemonstrated Zone 7 Capacity.

(14) PRMR position after accounting for undemonstrated Zone 7 capacity. A negative value means the Zone will need to import resource to meet its requirement. A positive value means the Zone may import resources based on economics but will not need to meet its PRMR.

U-21907 Results - LRZ 7 Winter Capacity Position (ZRCs)					
Line #		PY 2026	PY 2027	PY 2028	PY 2029
1	Planning Reserve Margin Requirements (PRMR)	15627	15627	15627	15627
2	Local Reliability Requirement (LRR)	18812	18812	18812	18812
3	Zonal Import Ability (ZIA)	4123	4123	4123	4123
4	Local Clearing Requirement (LCR)	14689	14689	14689	14689
5	Total Owned	15802	15775	16005	15992
6	Total PPA Contracts	2544	3083	3779	3932
7	Total ZRC Contracts	639	766	485	884
8	Total Qualified Demand Response	609	602	558	538
9	Total Resources (Line 5 + Line 6 + Line 7 + Line 8)	19594	20227	20827	21346
10	LCR Demonstrated Position (Line 9 - Line 4)	4905	5538	6138	6657
11	PRMR Demonstrated Capacity Position (Line 9 - Line 1)	3966	4600	5199	5718
12	Net Undemonstrated Zone 7 Capacity	229	10	371	37
13	Anticipated LCR Position (Line 10 + Line 12)	5133	5548	6509	6694
14	Anticipated PRMR Capacity Position (Line 11 + Line 12)	4195	4610	5571	5755

(1) PY 2026 PRMR from PRA Data and held constant at prompt year value.

(3) PY 2026 ZIA from PRA Data and held constant at prompt year value.

(4) PY 2026 LCR from PRA Data and held constant at prompt year value.

(5-9) Zone 7 resources included in capacity demonstrations sorted by resource type.

(10) LCR position based on demonstrated resources only.

(11) PRMR position based on demonstrated resources only.

(12) Net Undemonstrated Zone 7 Capacity is Staff's attempt to reconcile the capacity demonstration resources with the MISO PRA. There are resources located in Zone 7 that Staff anticipates will be in the PRA that were not included in any capacity demonstration as well as a small number of resources included in the capacity demonstration that are no longer available due to recent events.

(13) LCR Position after accounting for undemonstrated Zone 7 Capacity.

(14) PRMR position after accounting for undemonstrated Zone 7 capacity. A negative value means the Zone will need to import resource to meet its requirement. A positive value means the Zone may import resources based on economics but will not need to meet its PRMR.

U-21907 Results - LRZ 7 Spring Capacity Position (ZRCs)					
Line #		PY 2026	PY 2027	PY 2028	PY 2029
1	Planning Reserve Margin Requirements (PRMR)	19625	19625	19625	19625
2	Local Reliability Requirement (LRR)	20481	20481	20481	20481
3	Zonal Import Ability (ZIA)	5338	5338	5338	5338
4	Local Clearing Requirement (LCR)	15143	15143	15143	15143
5	Total Owned	15602	17513	17969	18508
6	Total PPA Contracts	3649	4389	5398	5777
7	Total ZRC Contracts	790	945	659	1175
8	Total Qualified Demand Response	703	704	656	660
9	Total Resources (Line 5 + Line 6 + Line 7 + Line 8)	20744	23550	24683	26119
10	LCR Demonstrated Position (Line 9 - Line 4)	5601	8407	9540	10976
11	PRMR Demonstrated Capacity Position (Line 9 - Line 1)	1118	3925	5057	6494
12	Net Undemonstrated Zone 7 Capacity	177	-80	328	-171
13	Anticipated LCR Position (Line 10 + Line 12)	5778	8328	9867	10805
14	Anticipated PRMR Capacity Position (Line 11 + Line 12)	1295	3845	5385	6323

(1) PY 2026 PRMR from PRA Data and held constant at prompt year value.

(3) PY 2026 ZIA from PRA Data and held constant at prompt year value.

(4) PY 2026 LCR from PRA Data and held constant at prompt year value.

(5-9) Zone 7 resources included in capacity demonstrations sorted by resource type.

(10) LCR position based on demonstrated resources only.

(11) PRMR position based on demonstrated resources only.

(12) Net Undemonstrated Zone 7 Capacity is Staff's attempt to reconcile the capacity demonstration resources with the MISO PRA. There are resources located in Zone 7 that Staff anticipates will be in the PRA that were not included in any capacity demonstration as well as a small number of resources included in the capacity demonstration that are no longer available due to recent events.

(13) LCR Position after accounting for undemonstrated Zone 7 Capacity.

(14) PRMR position after accounting for undemonstrated Zone 7 capacity. A negative value means the Zone will need to import resource to meet its requirement. A positive value means the Zone may import resources based on economics but will not need to meet its PRMR.