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STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,)
to make an administrative determination regarding)
the proper classification of transmission and)
distribution facilities of **WOLVERINE POWER**)
SUPPLY COOPERATIVE, INC., and to submit)
findings to the Federal Energy Regulatory)
Commission.)
_____)

Case No. U-13862

At the August 26, 2003 meeting of the Michigan Public Service Commission in Lansing,
Michigan.

PRESENT: Hon. J. Peter Lark, Chair
Hon. Robert B. Nelson, Commissioner
Hon. Laura Chappelle, Commissioner

ADMINISTRATIVE DETERMINATION

On March 17, 2003, Wolverine Power Supply Cooperative, Inc., (Wolverine) filed an application in Case No. U-13739 seeking an ex parte determination from the Commission of the appropriate division between the cooperative's transmission and local distribution facilities pursuant to the criteria set forth by the Federal Energy Regulatory Commission (FERC) in its Order No. 888.¹ In a separate order issued today in Case No. U-13739, the Commission has

¹Promoting Wholesale Competition Through Open Access Non-Discriminatory Transmission Services by Public Utilities; Recovery of Stranded Costs by Public Utilities and Transmitting Utilities, Order No. 888, 61 Fed Reg 21,540; FERC Stats & Regs, Regulations Preambles January 1991 to June 1996 ¶ 31,036 (1996). Thereafter, the FERC issued Order No. 888-A, which addressed requests for rehearing of Order No. 888 and reaffirmed the FERC's findings regarding the jurisdictional delineation between transmission and local distribution facilities. 62 Fed Reg 12,274; III FERC Stats and Regs ¶ 31,048, at pp. 30,181-82, 30,335-46 (1997).

dismissed Wolverine's application. However, dismissal of the application filed in Case No. U-13739 does not prevent the Commission from providing guidance to the FERC regarding application of the FERC's "seven factor test" for classifying Wolverine's transmission and distribution assets as contemplated by Order No. 888.

The Commission has a great deal of experience in applying the FERC's seven factor test.² Further, the FERC expressed its interest in having the Commission make such a determination with regard to Wolverine's transmission and distribution facilities when Wolverine previously requested approval from the FERC to join the Midwest Independent Transmission System Operator, Inc. (MISO). In an order issued by the FERC in Docket No. ER02-2458, the FERC stated that in negotiating a settlement, the parties were to use as a starting point that "Wolverine's transmission facilities must meet the requirements of the seven factor test, as interpreted by the Michigan Commission." 101 FERC ¶61,004, p. 21, (emphasis added). Accordingly, given the importance of a proper split of Wolverine's transmission and distribution systems, as well as the FERC's interest in the Commission's input, the Commission finds that it should review its files and records and make an administrative determination on the issue, which then may be submitted to the FERC.

In Order No. 888, the FERC deferred to the states in several areas concerning electric competition, including retail service to ultimate consumers, service reliability, generation and transmission siting, and authority to impose retail stranded cost charges. In the area of separating a utility's transmission and distribution functions, the FERC identified seven considerations that it

²See, the January 14, 1998 order in Case No. U-11283, the March 8, 1999 order in Case No. U-11856, the May 15, 2001 order in Case No. U-12896, the January 14, 1998 order in Case No. U-11337, the December 20, 2000 order in Case No. U-12690, the October 29, 2001 order in Case No. U-12744, the December 20, 2000 order in Case No. U-12706, and the December 20, 2000 order in Case No. U-12691.

found should be determinative of whether a particular power line or facility should be classified as a transmission or a distribution asset. The FERC's seven factors describe general characteristics of distribution systems as opposed to transmission systems. The seven considerations identified by the FERC are as follows:

1. Local distribution facilities are normally in close proximity to retail customers.
2. Local distribution facilities are primarily radial in character.
3. Power flows into local distribution systems; it rarely, if ever, flows out.
4. When power enters a local distribution system, it is not reconsigned or transported on to some other market.
5. Power entering a local distribution system is consumed in a comparatively restricted geographic area.
6. Meters are based at the transmission/local distribution interface to measure flows into the local distribution system.
7. Local distribution systems will be of reduced voltage.

The FERC indicated that it was not precluding consideration of other technical factors that are appropriate in light of historical uses of facilities. Accordingly, application of the FERC's seven factor test to Wolverine's power delivery facilities requires a technical and functional analysis that should involve consideration of the historical and current usage of those facilities.

Information available in the Commission's files and records indicates that Wolverine serves approximately 550 megawatts (MW) of connected load. To do so, it owns and operates approximately 1500 miles of 44 kilovolt (kV) and 69 kV lines as well as over 80 miles of 138 kV lines. However, it is important to note that Wolverine's system is surrounded by and connected to the Michigan Electric Transmission Company, LLC (METC). The METC's electric power delivery facilities were formerly Consumers Energy Company's (Consumers) transmission system. This

situation persuades the Commission that the same technical/functional criteria used to evaluate Consumers' facilities in Case No. U-11283 should be used to classify Wolverine's system.

The FERC's seven factors do not specify a particular voltage level for distribution facilities. Neither do they specify that distribution is only radial in character. Also, the FERC does not specify that power always flows into a distribution system. However, the factors indicate that power that flows into a local distribution system is not reconsigned or transported to some other market, but is consumed in a comparatively restricted geographic area. Further, the FERC factors indicate that distribution systems are of reduced voltage and have meters based at the interface with transmission lines to measure flows into the local distribution system.

With all of these considerations in mind, the Commission notes that the highest voltage facilities in the region are 345 kV. All of the 345 kV facilities in immediate proximity to Wolverine's facilities belong to METC and have been classified as transmission. The Wolverine system is close to retail customers, substantially radial in character, and the power entering its system is consumed in a comparatively restricted geographic area. These characteristics of the Wolverine system resemble a distribution system.

The manner of electrical operation and power flows on Wolverine's system (as contrasted to the METC system) also provide some guidance regarding the proper classification of Wolverine's transmission and distribution facilities. Power flow simulations are tools used by transmission system operators to study system electrical performance. MISO has operational responsibility for regional transmission facilities, including the METC facilities. According to information available in Case No. U-13739, power system operators typically rely on many power transfer simulations between electric systems to establish the electrical transfer capability of various transmission facilities. Consumers asserted in Case No. U-13739 that under such simulations, the Outage

Transfer Distribution Factor (OTDF) and Power Transfer Distribution Factor (PTDF) for all Wolverine facilities below 138 kV are below MISO operating thresholds, which means the Wolverine system is operationally “invisible” to MISO’s operation of the transmission grid.

Further evidence of a lack of Wolverine’s participation in regional power transfers is the fact that neither the East Central Area Reliability Coordination Agreement (ECAR) nor the North American Electric Reliability Council (NERC) have included Wolverine’s 44 kV and 69 kV lines in power flow models prior to 2002. Moreover, it appears that MISO currently does not depict any of Wolverine’s 44 kV or 69 kV lines in its power flow models on the MISO website.

Based on these considerations and consistent with our previous orders applying the seven factor test, the Commission concludes the following with regard to classification of Wolverine’s system.

1. Wolverine’s Airport 138 kV line performs as a transmission facility and should be classified as transmission.
2. The looped 138 kV portions of Wolverine’s Blendon, Bradley, Oden, Sternberg, and Vestaburg substations perform as transmission facilities and should be classified as transmission.
3. Wolverine’s 138 kV radial facilities, 138-69 kV step-down transformers, 69 kV facilities, 69-44 kV step-down transformers, and 44 kV facilities do not perform a transmission function and should be classified as distribution facilities.

The Commission FINDS that:

- a. Jurisdiction is pursuant to 1909 PA 106, as amended, MCL 460.551 et seq.; 1919 PA 419, as amended, MCL 460.51 et seq.; 1939 PA 3, as amended, MCL 460.1 et seq.; 1969 PA 306, as amended, MCL 24.201 et seq.; and the Commission's Rules of Practice and Procedure, as amended, 1999 AC, R 460.17101 et seq.

b. Wolverine's Airport 138 kV line performs as a transmission facility and should be classified as transmission.

c. The looped 138 kV portions of Wolverine's Blendon, Bradley, Oden, Sternberg, and Vestaburg substations perform as transmission facilities and should be classified as transmission.

d. Wolverine's 138 kV radial facilities, 138-69 kV step-down transformers, 69 kV facilities, 69-44 kV step-down transformers, and 44 kV facilities do not perform a transmission function and should be classified as distribution facilities.

e. The Commission's findings should be submitted to the FERC for its consideration.

THEREFORE, IT IS ORDERED that the Commission's Acting Executive Secretary is directed to transmit a copy of the Commission's administrative determination in this proceeding to the Federal Energy Regulatory Commission.

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

MICHIGAN PUBLIC SERVICE COMMISSION

/s/ J. Peter Lark

Chair

(S E A L)

/s/ Robert B. Nelson

Commissioner

/s/ Laura Chappelle

Commissioner

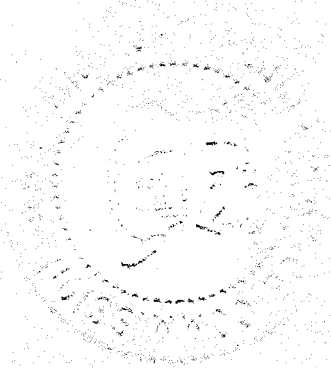
By its action of August 26, 2003.

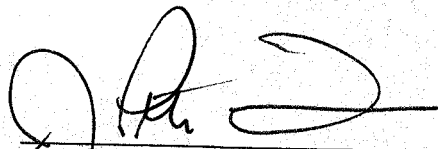
/s/ Robert W. Kehres

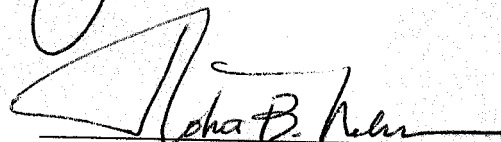
Its Acting Executive Secretary

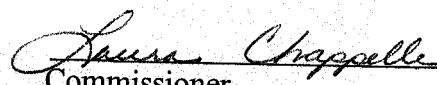
The Commission reserves jurisdiction and may issue further orders as necessary.

MICHIGAN PUBLIC SERVICE COMMISSION

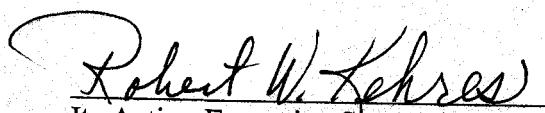



Chair


Commissioner


Commissioner

By its action of August 26, 2003.


Its Acting Executive Secretary

PROOF OF SERVICE

STATE OF MICHIGAN)

Case No. U-13862


County of Ingham)

Patricia A. Fronta being duly sworn, deposes and says that on August 26th 2003, A.D. she served a copy of the attached Commission orders by first class mail, postage prepaid, or by inter-departmental mail, to the persons as shown on the attached service list.



Patricia Fronta

Subscribed and sworn to before me
this 26th day of August 2003



Sharron Allen
Notary Public, Ingham, County, Michigan
My Commission expires August 16, 2004

ALL ELECTRIC ORDERS

PAGE: 1
DATE: 08/25/2003

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MR. PHILLIP CROSS
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**Municipal Electric Utilities –
Unregulated by the MPSC
PAGE 1 OF 2**

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**Municipal Electric Utilities –
Unregulated by the MPSC
PAGE 2 OF 2**

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INDIANAPOLIS, IN 46214

Electric Mailing Labels

(23)

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8-21-03
(26)**

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One Jackson Square, Suite 1060
Jackson, MI 49201-2277

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c/o Michigan Power Limited Partnership
5795 West 6th Street
Ludington, MI 49431

~~**Energy International Power Marketing Corp**
22226 Garrison
Dearborn, MI 48124
ATTN: Rami Fawaz~~
*Return needed
&
Re-mailed*

Engage Energy America LLC
(Formerly Engage Energy US, L.P.)
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Calgary Alberta Canada T2P 3L8

Metro Energy, LLC
c/o Detroit Metropolitan Airport
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Detroit, MI 48242
ATTN: Linda S. Ackerman

Nicor Energy, LLC
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Lisle, IL 60532-4306

Premier Energy Marketing L.L.C.
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ATTN: Bruce Schlansker/George Deljevic

Strategic Energy, L.L.C.
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Southfield, MI 48034

**AEP Ohio Commercial & Industrial Retail Co.
LLC, d/b/a AEP Retail Energy**
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Lansing, MI 48933

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St. Clair Shores, MI 48080

Dillon Energy Services, Inc.
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ElectricAMERICA
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Exelon Energy Company
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Mirant America Retail Energy Marketing, LP
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Quest Energy, LLC
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Sempra Energy Solutions
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WPS Energy Services, Inc.
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Traverse City, MI 49684-5485

PROOF OF SERVICE

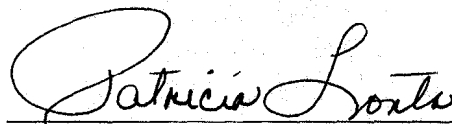
STATE OF MICHIGAN)

Case No. U-13862

County of Ingham)

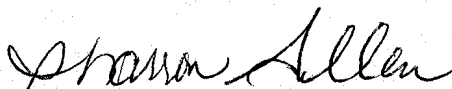
Patricia A. Fronta being duly sworn, deposes and says that on September 4th 2003, A.D. she served a copy of the Commission Order by re-mailing copies thereof by first class mail, postage prepaid, or by inter-departmental mail, to the persons as shown below:

Energy International Power Marketing Corp
d/b/a PowerOne Corporation
6850 Haggerty
Canton, MI 48187
ATTN: Rami Fawaz



Patricia Fronta

Subscribed and sworn to before me
this 4th day of September 2003



Notary Public, Ingham, County, Michigan
My Commission expires August 16, 2004