S T A T E O F M I C H I G A N

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter, on the Commission's own motion to examine the changes to the regulations implementing the Public Utility Regulatory Policies Act of 1978, 16 USC 2601 *et seq*., pursuant to the Federal Energy Regulatory Commission Final Order No. 872.	)	Case No. U-20905
In the matter, on the Commission's own motion, establishing the method and avoided cost calculation for **ALPENA POWER COMPANY** to fully comply with the Public Utility Regulatory Policies Act of 1978, 16 USC 2601 *et seq*.	)	Case No. U-18089
In the matter, on the Commission's own motion, establishing the method and avoided cost calculation for **CONSUMERS ENERGY COMPANY** to fully comply with the Public Utility Regulatory Policies Act of 1978, 16 USC 2601 *et seq*.	)	Case No. U-18090
In the matter, on the Commission's own motion, establishing the method and avoided cost calculation for **DTE ELECTRIC COMPANY** to fully comply with the Public Utility Regulatory Policies Act of 1978, 16 USC 2601 *et seq*.	)	Case No. U-18091
In the matter, on the Commission's own motion, establishing the method and avoided cost calculation for **INDIANA MICHIGAN POWER COMPANY** to fully comply with the Public Utility Regulatory Policies Act of 1978, 16 USC 2601 *et seq*.	)	Case No. U-18092

In the matter, on the Commission's own motion, establishing the method and avoided cost calculation for **NORTHERN STATES POWER COMPANY** to fully comply with the Public Utility Regulatory Policies Act of 1978, 16 USC 2601 *et seq*.	)	Case No. U-18093
In the matter, on the Commission's own motion, establishing the method and avoided cost calculation for **UPPER MICHIGAN ENERGY RESOURCES CORPORATION** to fully comply with the Public Utility Regulatory Policies Act of 1978, 16 USC 2601 *et seq.*	)	Case No. U-18095
In the matter, on the Commission's own motion, to establish MI Power Grid.	)	Case No. U-20645
In the matter, on the Commission's own motion, to commence a collaborative to consider best practices to ensure cost-effective development of new energy resources and to limit procurement barriers for emerging technologies, including processes for competitive bidding.	)	Case No. U-20852

At the October 29, 2020 meeting of the Michigan Public Service Commission in Lansing, Michigan.

PRESENT: Hon. Daniel C. Scripps, Chair
Hon. Sally A. Talberg, Commissioner
Hon. Tremaine L. Phillips, Commissioner

ORDER

Background

Over the past several years, the energy landscape in the United States and in Michigan has been rapidly evolving to move away from a heavy reliance on traditional fossil fuel generation and to shift to incorporating new renewable energy technologies in public utilities' electric supply portfolios. Electricity markets have also transformed over the decades to become more open, diverse wholesale markets with independent generators producing energy and capacity in addition to public utilities.

Citing these changes, on October 4, 2019, the Federal Energy Regulatory Commission (FERC) began the process of updating and revising rules under the Public Utility Regulatory Policies Act of 1978, PL 95–617; 92 Stat 3117 (PURPA) by issuing a notice of proposed rulemaking (NOPR). In the NOPR, FERC explained its intent was to revise its PURPA regulations to rebalance the rights and obligations in the PURPA regulations and achieve the following: (1) grant state regulatory authorities flexibility in setting energy rates in PURPA contracts and other legally enforceable obligations (LEOs); (2) reduce an electric utility's obligation to purchase from qualifying facilities (QFs) to the extent the utility's supply obligation has been reduced by a state retail choice program; (3) modify the one-mile rule; (4) reduce the rebuttable presumption that small power producers at 20 megawatts (MW) or below do not have non-discriminatory access to wholesale markets; (5) clarify LEO criteria; and (6) allow entities to protest QF self-certification. *See*, 168 FERC ¶ 61184 (2019).

On July 16, 2020, FERC issued an order, 172 FERC ¶ 61,041 (FERC Order 872), which included significant revisions to the implementation of statutory sections 201 and 210 of PURPA[1] in the rules set forth in 18 CFR Parts 292 and 375. These revisions impact the areas of rates paid to QFs, the one-mile rule, a utility's obligation to purchase, LEOs, and QF self-certification. The following is a summary of the order's revisions to the rules:

[1] 16 USC 796; 16 USC 824a-3.

- Rates: The order grants states flexibility to require energy rates, but not capacity rates, in QF contracts and LEOs to vary in accordance with changes in the utility's avoided costs; to allow QFs to retain fixed energy rates based on projected energy rates; to set as available energy rates for utilities located in wholesale energy markets with a rebuttable presumption that the locational marginal price (LMP) in those markets represents avoided cost or allow QFs to sell outside the wholesale market; and to set energy rates based on a competitive solicitation based on transparent and non-discriminatory procedures and subject to the standards set out in *Allegheny Energy Supp Co, LLC*, 108 FERC ¶ 61,082 (2004).[2]

- One-Mile Rule: The order modified the one-mile rule that determines whether generation facilities are considered to be the same site for purposes of determining status as a small power production facility QF. The rule is modified such that there continues to be a rebuttable presumption that facilities less than one mile apart constitute a single facility, but parties can show that facilities more than one mile and less than 10 miles apart constitute a single facility. There is also an irrebuttable presumption that facilities 10 miles apart or more are separate facilities.

- Obligation to Purchase: The order revises PURPA regulations such that a utility's obligation to purchase from a QF is terminated when a QF has non-discriminatory access to certain energy markets. The rebuttable presumption that QFs with a net capacity at or below 20 MW do not have non-discriminatory access to energy markets is reduced to 5 MW for small power production facilities. This revision applies prospectively and does not affect rights or obligations under existing PURPA contracts. The obligation to purchase for cogeneration facilities remains the same at 20 MW.

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[2] In *Allegheny*, FERC added four guidelines to a previously articulated principle for evaluating fairness in requests for proposals (RFPs) or competitive solicitations in FERC case, *Boston Edison Co. Re: Edgar Electric Energy Co*., 55 FERC ¶ 61,382 (1991), which held that no affiliate should receive preferential treatment in an RFP. FERC's four added guidelines in *Allegheny* for evaluating RFPs include transparency, definition, evaluation, and oversight. Transparency means that all relevant bid information is provided to each bidder at the same time, the solicitation is widely publicized and open as opposed to the utility inviting bidders, and information provided in communications between the utility and one bidder is provided to all bidders (with the exception of proprietary information). Definition means the utility must clearly and precisely define the product sought in an RFP, which at a minimum should include capacity and term but should also include fuel type, plant technology, transmission requirements, and any other relevant detail. Evaluation means the utility must clearly define the price and non-price criteria under which it will evaluate bids and the importance of each criterion so that no one bidder has an advantage. Lastly, oversight means that an independent third party with no financial interest in the bid or outcome of the bid should design the solicitation, administer the bidding, and evaluate bids prior to the utility's evaluation. A state regulatory commission can also select the independent administrator to ensure independence. *Allegheny*, 108 FERC ¶ 61,417-61,419.

- Retail Choice and Obligation to Purchase: FERC declined to adopt the proposed regulation in the NOPR permitting states with retail competition to allow relief from the purchase obligation and instead clarified that the existing federal PURPA regulations already require states, to the extent practicable, to account for reduced loads in setting QF rates. Specifically, 18 CFR 292.304(e)(3), which will continue as is, allows states, when setting avoided cost rates, to take into account "the ability of the electric utility to avoid costs, including the deferral of capacity additions." FERC interprets 18 CFR 292.304(e)(3) as allowing a state to consider reductions in a purchasing electric utility's supply obligations given retail competition. FERC further stated that this clarification is not intended to be reflected as a MW-for-MW reduction (or increase) based on yearly changes in load and therefore, does not terminate a purchasing utility's mandatory purchase obligation under Section 210(a) of PURPA.

- LEO: The order requires states to establish objective and reasonable criteria to determine a QF's commercial viability and financial commitment to construction of a generation facility before a QF is entitled to an LEO. The order provides that the factors a state may require a QF to demonstrate must be in the QF's control and provided the following non-exhaustive list of examples: (1) taking meaningful steps to obtain site control adequate to commence construction of the project at the proposed location; (2) filing an interconnection application with the appropriate entity; and (3) submitting all applications, including filing fees, to obtain all necessary local permitting and zoning approvals. The order also clarifies that a demonstration of financial commitment does not require the QF to show that is has obtained financing and requiring a showing of obtained financing or a signed power purchase agreement is prohibited by the order. Rather, requiring QFs to, apply for all relevant permits, take meaningful steps to seek site control, or meet other objective and reasonable milestones in the QF's development can sufficiently demonstrate QF developers' financial commitments.

- Self-Certification: The order allows an entity to protest a QF's self-certification or self-recertification without having to file and pay for a declaratory order. Entities may also protest new certifications that make substantive changes to existing certifications.

Under PURPA, "the states play the primary role in calculating avoided costs and in overseeing the contractual relationship between QFs and utilities operating under the regulations promulgated by the FERC." *Indep Energy Producers Ass'n Inc v Cal Pub Utils Comm'n*, 36 F3d 848, 856 (CA 9, 1994). As part of its role in implementing PURPA in a manner compliant with the statute and FERC's regulations, in 2015, the Commission began the task of updating the avoided costs paid to QFs by electric utilities, which had been in place since the 1980s, and addressing other related issues.

On May 3, 2016, the Commission initiated proceedings for the rate-regulated utilities captioned above, to undertake a comprehensive reexamination of avoided costs and accompanying issues. Subsequently, the Commission completed proceedings for each above-captioned utility and arrived at updated avoided costs, standard offer contracts[3] and standard offer tariffs, and associated issues including planning horizons, avoided energy rate structure, standard offer contract eligibility and contract length terms, and treatment of renewable energy credits, among others. Many of the Commission's decisions appear to be generally aligned with

[3] Standard offer contracts have been approved for only DTE Electric Company (DTE Electric) in Case No. U-18091 and Consumers Energy Company (Consumers) in Case No. U-20165.

the revisions set forth in FERC Order 872, such as the avoided cost methodologies.[4] However, there are changes in FERC Order 872 that impact the Commission's decisions and approved tariffs. For example, the rebuttable presumption that a QF with a net capacity above 20 MW has non-discriminatory access to energy markets is revised to lower the net capacity threshold from 20 MW to 5 MW. Moreover, aspects of FERC Order 872 provide guidance with options available to states in implementing PURPA, such as the option to utilize competitive procurement to set avoided costs, that the Commission believes require further assessment.

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[4] In Case No. U-18090, Consumers' PURPA docket, the Commission initially approved an avoided cost methodology based on the hybrid proxy method using a natural gas combustion turbine proxy unit for capacity and three proxy options for energy. May 31, 2017 order in Case No. U-18090. On June 7, 2019, the Commission approved a contested settlement agreement in Case No. U-20165 (June 7 order), Consumers' integrated resource plan case, which included approval of an updated avoided cost methodology that incorporates competitive bidding. June 7 order, pp. 3, 91; *see also* Exhibit A to the June 7 order, p. 2. In Case No. U-18091, the Commission approved an avoided cost methodology for DTE Electric based on the natural gas combined cycle plant, Blue Water Energy Center, approved in Case No. U-18419. December 20, 2018 order in Case No. U-18091, p. 17. Alpena Power Company's (Alpena's) avoided costs are based on what the utility pays to Consumers for supplemental power under a 30-year all-requirements contract. Exhibit A to the December 6, 2018 order in Case No. U-18089, pp. 2-3. Indiana Michigan Power Company's (I&M's) approved avoided cost methodology is based on a combustion turbine for capacity and LMP in the PJM Interconnection, LLC market for energy. December 20, 2018 order in Case No. U-18092, pp. 10-11. In Case No. U-18093, the Commission approved an avoided cost methodology for Northern States Power Company, a Wisconsin Corporation (NSP-W), with capacity based on a combustion turbine and avoided energy cost based on LMP. December 20, 2018 order in Case No. U-18093, pp. 9-10. The Commission approved an avoided cost methodology based on Midcontinent Independent System Operator, Inc. (MISO) market prices for energy and capacity for Upper Peninsula Power Company (UPPCo). Attachment 1 to Exhibit A to the January 23, 2018 order in Case No. U-18094, p. 4; *see also* Exhibit A to the February 6, 2020 order in Case No. U-20350, p. 7, updating avoided costs and related PURPA terms. For Upper Michigan Energy Resources Corporation (UMERC), the Commission approved an avoided cost methodology based on MISO's capacity and energy market values. December 20, 2018 order in Case Nos. U-18095 and U-18096, p. 13. On January 1, 2017, UMERC acquired the electric and gas distribution facilities of Wisconsin Electric Power Company and Wisconsin Public Service Corporation and thus, Case Nos. U-18095 and U-18096 were consolidated into Case No. U-18095.

In light of the breadth of the new FERC order and the options available to states and utilities provided thereunder, as well as the different types of existing or potential QFs in Michigan that could be impacted, the Commission finds it is appropriate to open this docket to consider the impacts of FERC Order 872 on prior Commission decisions and utility tariffs.

Through this order, the Commission seeks comments from interested stakeholders as it identifies the potential implications of FERC Order 872 on utilities within the Commission's jurisdiction and QFs operating in Michigan and provides guidance on a path forward to implement applicable provisions. While not exhaustive, the Commission requests comments from interested parties in response to the following questions:

1. To what extent does FERC Order 872 require modification of the Commission's prior orders in the above-captioned cases as well as Commission-approved contracts, tariffs, and agreements to implement PURPA in Michigan? What aspects of those prior orders may need to be modified and how?
    a. Addressing the revisions to allow states flexibility to set energy rates, FERC Order 872 states that: "State regulators may not change rates in existing QF contracts or other existing LEOs. By its terms, the variable energy avoided cost provision adopted in this final rule applies only prospectively to new contracts and new LEOs entered into after the effective date of this final rule. Nothing in the final rule, including in this preamble, should be read as sanctioning the modification of existing fixed-rate QF contracts and LEOs." FERC Order 872, p. 157. When addressing Question 1, please be specific on the applicability of the new rules to existing QFs and associated contract terms (including new provisions that may alter expiration of existing contracts) and expiring contracts versus new QF facilities or contracts.

2. If revisions are required to the Commission's prior PURPA decisions, what process should the Commission utilize to update Commission-approved tariffs and other Commission-approved documents such as the standard offer contract?

3. FERC Order 872 determines that avoided capacity costs may be priced at zero under certain circumstances, namely when: (1) an electric utility procures all of its supply-side resources through a competitive solicitation that meets the guidelines as set forth in Order 872; (2) the state regulatory authority and independent administrator both certify that competitive bidding meets the guidelines; and (3) the state requires the electric utility's total planned self-build and power purchase options to compete in the competitive solicitations (i.e., no supply arrangements outside of the conforming competitive bidding process).

a. What are the implications of these provisions given the current status quo in Michigan with respect to procurement and determining capacity needs and associated avoided cost rates?
b. Is there interest in moving to this model for competitive procurement and associated avoided cost pricing? If so, what actions would be required by the Commission and electric utilities to establish appropriate protocols that align with the guidance issued in FERC Order 872 for conducting fair and non-discriminatory competitive procurements?
    i. What approaches and timing considerations should the Commission take into account to set up a competitive procurement model?
    ii. Should details be addressed through the MI Power Grid competitive procurement workgroup initiated in Case No. U-20852?

4. Is further guidance from the Commission necessary to define an LEO consistent with FERC Order 872? If so, should such guidance be issued through a rulemaking or a Commission order or orders?

The Commission also welcomes additional comments outside of direct responses to these questions that are relevant to the impacts of the FERC Order 872 on the Commission's current implementation of PURPA and effective orders in the above-captioned dockets.

Any person may submit written or electronic responsive comments to this order. Comments must be filed with the Commission and must be received no later than 5:00 p.m. (Eastern time (ET)) on November 30, 2020. Reply comments must be filed no later than 5:00 p.m. (ET) on December 15, 2020. Written comments should be sent to: Executive Secretary, Michigan Public Service Commission, P.O. Box 30221, Lansing, MI 48909. Electronic comments may be e-mailed to mpscedockets@michigan.gov. All comments should reference Case No. U-20905. All information submitted to the Commission in this matter will become public information available on the Commission's website and subject to disclosure.

Section 6v of 2016 PA 341, MCL 460.6v(1) requires the Commission to review the procedures and rates schedules including avoided cost rates pursuant to PURPA in a contested proceeding. In the final orders issued in the above captioned PURPA dockets, the Commission directed each electric provider to file for a biennial review by a certain date. Due to the revisions to FERC's PURPA regulations issued in FERC Order 872, the Commission finds the filing deadline for biennial reviews for some of the above-captioned utilities should be extended to allow time to assess the impact of FERC Order 872. DTE Electric is scheduled to file its next biennial review no later than November 13, 2020. February 20, 2020 order in Case No. U-20471, p. 56. NSP-W and UMERC are scheduled to file for their respective biennial reviews no later than December 21, 2020. I&M is scheduled to file for its biennial review in March 2021. The Commission finds it reasonable to extend the deadlines for DTE Electric, NSP-W, UMERC, and I&M to April 5, 2021. The Commission finds that the remaining electric providers' deadlines (June 2021 for Consumers and February 2022 for UPPCo) may be far enough out for the utilities to thoroughly assess the impact of the PURPA rule changes in FERC Order 872, and thus, the Commission declines to extend these deadlines at this time. The Commission also notes that Alpena filed for a biennial review on November 18, 2019, and that the proceeding is currently pending before the Commission and will be addressed with a forthcoming order.

THEREFORE, IT IS ORDERED that:

A. Case No. U-20905, is opened for the purpose of receiving comments and reply comments on the impacts and implications of the Federal Energy Regulatory Commission Order No. 872 on the Commission's current implementation of the Public Utility Regulatory Policies Act of 1978, as described in this order. Comments must be received no later than 5:00 p.m. (Eastern time) on November 30, 2020, and reply comments must be received no later than 5:00 p.m. (Eastern time) on December 15, 2020.

B. The deadlines for filing for a biennial review of its avoided costs and associated issues for DTE Electric Company; Northern States Power Company; Upper Michigan Energy

Resources Company; and Indiana Michigan Power Company are extended to April 5, 2021. The biennial review filing deadlines for the other above-captioned utilities remain unchanged.

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, under 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 mpscedockets@michigan.gov and to the Michigan Department of the Attorney General - Public Service Division at pungp1@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

Sally A. Talberg, Commissioner

Tremaine L. Phillips, Commissioner

By its action of October 29, 2020.

Lisa Felice

Lisa Felice, Executive Secretary

P R O O F O F S E R V I C E

STATE OF MICHIGAN)

Case No. U-20905 *et al.*

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on October 29, 2020 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 J. Brown

Brianna Brown

Subscribed and sworn to before me
this 29th day of October 2020.

Angela P. Sanderson

Angela P. Sanderson
Notary Public, Shiawassee County, Michigan
As acting in Eaton County
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