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 open a docket for load serving entities in Michigan to file their capacity demonstrations for the 2029/2030 planning year as required by MCL 460.6w.	)	Case No. U-21907
In the matter, on the Commission's own motion, to open a docket for load serving entities in Michigan to file their capacity demonstrations for the 2030/2031 planning year as required by MCL 460.6w.	)	Case No. U-22142

At the July 16, 2026 meeting of the Michigan Public Service Commission in Lansing, Michigan.

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

ORDER

Background and Procedural History

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

Commission, as applicable.[1] This is known as the state reliability mechanism (SRM) capacity demonstration.

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

In the August 21, 2025 order in Case Nos. U-21775 *et al*. (August 21 order), the Commission opened the docket in Case No. U-21907 for the purpose of receiving the LSEs'

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

[2] The filing requirements have been slightly modified in the intervening years. *See*, September 13, 2018 order in Case No. U-20154. In the March 17, 2019 order in Case No. U-20154, the Commission also approved a protective order for use with capacity demonstration filings. That protective order may also be used in Case No. U-22142 for the 2030/2031 capacity demonstration.

capacity demonstrations for the 2029/2030 planning year (PY).[3] In response to a shift to a seasonal capacity auction and other developments at the Midcontinent Independent System Operator, Inc., (MISO), the Commission adjusted the capacity demonstration filing dates as permitted under Section 6w(10) and directed larger investor-owned utilities (IOUs)[4] to file by February 24, 2026; small IOUs to file by March 3, 2026; and AESs, cooperatives, and municipally owned utilities to file by March 17, 2026. The Commission also directed the Staff to file its analysis of the demonstrations no later than May 12, 2026, and to file an update to the energy storage capacity amounts for electric providers using the Statewide Energy Storage Target Calculation within 30 days after the completion of the capacity demonstrations for the 2029/2030 PY. *See*, August 21 order, pp. 21-23.

Also of note, on February 27, 2025, the Commission issued an order in Case Nos. U-21775 *et al*. (February 27 order) granting a motion for clarification filed by Energy Michigan regarding the requirements applicable to the capacity demonstrations filed by AESs pursuant to Section 6w(8)(b). In the February 27 order, the Commission clarified the wording in the Capacity Demonstration Process and Requirements document and the General Affidavit to align with its previously expressed interpretation that Section 6w's four-year forward capacity demonstration requirement does not prevent an LSE from entering into other capacity

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[3] MCL 460.6w(8)(a) states that if an SRM is to be established, the Commission shall require, among other things, each electric utility to demonstrate by December 1st of each year that "for the planning year beginning 4 years after the beginning of the current planning year" that the utility owns or has contractual rights to sufficient capacity to meet its load obligations. Thus, the statute requires the capacity demonstrations to be four years out after the year the capacity demonstrations are required to be filed. As such, the capacity filings in Case No. U-21907 cover the 2029/2030 PY.

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

agreements or contracts outside of the original capacity contract after the LSE has successfully demonstrated its capacity obligation.

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

In compliance with Section 6w(8) and the August 21 order, all LSEs required to file capacity demonstrations by the directed deadlines have filed, and on May 12, 2026, the Staff filed its Capacity Demonstration Results: The Planning Year 2029/2030 report (Staff Report). Additionally, on May 7, 2026, the Staff filed the 2026 Statewide Energy Storage Target Calculation, which is the calculation that identifies each LSE serving customers in Michigan and its proportional share of the minimum statewide energy storage target, using peak load information for the previous five years filed in capacity demonstration filings under Section 6w. The Staff performed this calculation in accordance with the methodology approved by the Commission in the January 23, 2025 order in Case No. U-21571 (January 23 order). In the 2026 Statewide Energy Storage Target Calculation filing, the Staff explains that the calculation is to be used by LSEs filing either an energy storage plan or contracts for the necessary qualifying storage facilities in the current year, in accordance with Section 101 of Public Act 235 of 2023 (Act 235), MCL 460.1101. These calculations will be updated annually by the Staff to allow for LSEs filing in that year to use the most recent data. Future updates to the calculated storage capacity for each LSE will be filed by the Staff annually through 2029, in the open docket for LSE capacity demonstration filings, within 30 days after the completion of capacity demonstration filings as required under Section 6w for that year. *See*, Case No. U-21907, filing #U-21907-0057; *see also*, January 23 order, p. 29.

This order summarizes the Staff Report, addresses recommendations therein, and opens a new docket, Case No. U-22142, for the receipt of capacity demonstration filings for the 2030/2031 PY.

The Commission Staff Report

The Staff begins its report with an executive summary noting that the MISO local resource zone (LRZ) 7, which covers most of Michigan's lower peninsula, will have sufficient resources to meet its planning reserve margin requirements (PRMR) and local clearing requirements (LCR) in all four seasons. The Staff also provides the results of the most recent Organization of MISO States (OMS)-MISO Resource Adequacy Survey of 2025 detailing the resource adequacy of summer, fall, winter, and spring seasons for a five-year period, PY 2026/2027 through PY 2030/2031. Staff Report, pp. 3-4. Additionally, MISO's 2026/2027 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. *Id*., p. 4.

Next, the Staff explains that, as part of its pre-capacity demonstration process, it consulted several LSEs to discuss the requirements of the capacity demonstration process. As to the capacity demonstration filings, the Staff states that it received the required timely filings[5] (some of which were filed confidentially) from the following LSEs: DTE Electric Company (DTE Electric); Consumers Energy Company (Consumers); Alpena Power Company (Alpena); Indiana Michigan Power Company (I&M); Northern States Power Company, a Wisconsin corporation; Upper Michigan Energy Resources Corporation; Upper Peninsula Power Company; American Rural Cooperative Power, Inc.; Bayfield Electric Cooperative, Inc.; Calpine Energy Solutions, LLC; Escanaba Electric Department; City of Stephenson; City of Wakefield; Cloverland Electric Co-Operative; CMS ERM Michigan LLC; Constellation NewEnergy, Inc.; Croswell Municipal Light and Power; Daggett Electric Department; NRG Energy Services LLC (f/k/a Direct Energy Business, LLC); Energy Harbor LLC; Michigan Public Power Rate Payers Association; American Municipal Power, Inc.; Newberry Water and Light Board; Union City Electric Department; Wolverine Power Supply Cooperative, Inc.; and WPPI Energy.

Per the Staff Report, all LSEs were able to procure the necessary capacity to demonstrate compliance for the 2029/2030 PY in all four seasons. The Staff notes that it audited each capacity demonstration filing, requested further information when necessary, and reviewed

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[5] The following AESs filed letters in Case No. U-21907 indicating that they are not currently serving customers in Michigan: AEP Energy, Inc.; BP Energy Retail Company LLC; Dillon Power, LLC; Direct Energy Services, LLC; Energy Services Providers, Inc. (d/b/a Michigan Gas & Electric); Interstate Gas Supply, LLC; Just Energy Solutions Inc.; Energy International Power Marketing Corporation; MidAmerican Energy Services, LLC; Nordic Energy Services, LLC; Texas Retail Energy, LLC; and UP Power Marketing LLC. Staff Report, p. 6, n. 8.

contracts included in the capacity demonstration from LSEs. Staff Report, p. 6. The Staff indicates that most LSEs complied with the Commission's directive in the August 21 order to include in their capacity demonstration filings data for the prompt and interim years in addition to the compliance year and that the Staff was able to estimate the amount of capacity available in the prompt and interim years for those LSEs that did not comply. The Staff asks the Commission to continue to direct LSEs to include updated prompt and interim year capacity obligation and resource information in future capacity demonstration filings. Staff Report, p. 7.

The Staff also notes that Alpena included in its filing an alternative interpretation of the 5% limit on PRA acquisitions. Per the Staff:

> 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.

Id., p. 7. Thus, the Staff recommends that the Commission clarify that the 5% limit on resources acquired from the PRA in the demonstration year is a limit based on either a total annual requirement or a per seasonal requirement and direct Alpena to take additional action if necessary. *Id*.

The Staff Report provides an overview of zonal resource adequacy for Michigan, which contains load that spans two regional transmission organizations (RTOs), MISO and PJM Interconnection, LLC (PJM), with the majority of the state's load located in MISO's footprint. The Staff adds that MISO and PJM have different resource adequacy constructs and capacity obligations. Beginning with MISO, the Staff Report recounts that Michigan LSEs serve load in MISO LRZs 1, 2, and 7 and explains MISO's resource adequacy construct as follows:

> MISO establishes capacity obligations for all LSEs based on peak load forecasts and a planning reserve margin percentage (PRM) necessary to meet the North American Electric Reliability Corporation's (NERC[‘s]) Loss of Load Expectation (LOLE) standard of 1 day in 10 years. LSEs within MISO can meet their capacity requirements either through a Fixed Resource Adequacy Plan (FRAP), self-schedule, Reliability Based Demand Curve (RBDC) opt-out, 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.
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> 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.

Staff Report, p. 9.

Explaining the LCR further, the Staff states that the LCR is the minimum required capacity to be located within a zone to meet the LOLE standard while accounting for the zone's ability to import. The LCR is for the entire zone, not just applicable to an individual LSE. The Staff notes that, at this time, there is no LCR requirement under MCL 460.6w applicable to individual LSEs in Michigan.[6] The Staff explains that:

> [t]he 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.

Id.

The Staff states that in the 2023/2024 PY, MISO implemented a seasonal resource adequacy requirement for each summer, fall, winter, and spring season and a seasonal accredited capacity (SAC) methodology for certain resources participating in MISO's PRA to align with real time availability and planned outages. The Staff explains that it reviewed these changes with participants in technical conferences per the June 23, 2022 order in Case Nos. U-21099 *et al*. The August 22, 2024 order in Case Nos. U-21393 *et al*. (the capacity demonstration docket for the 2027/2028 PY) directed LSEs in MISO to demonstrate seasonal capacity obligations based on MISO's seasonal resource adequacy construct. Staff Report, p. 10. Additionally, in the 2025/2026 PY, MISO's RBDC tariff revision implemented sloped demand curves into the PRA. The August 21 order directed LSEs to meet Initial PRMRs for the capacity demonstration to clarify requirements after implementation of the sloped demand curves. Per the Staff Report, the specific capacity obligation for each season will be the LSE's prompt year (upcoming year) Initial PRMR for each respective season. *Id*., p. 10.

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

Energy Michigan and the Association of Businesses Advocating Tariff Equity (ABATE) filed a complaint in federal district court challenging the constitutionality of the individual LCR. On February 24, 2023, the U.S. District Court for the Eastern District of Michigan issued a judgment in favor of the Commission dismissing with prejudice the complaint filed by Energy Michigan and ABATE and finding that the plaintiffs did not meet their burden to show that the individual LCR requirement discriminates against interstate commerce, while the defendants established the necessity and legitimate purpose of the LCR in ensuring grid reliability that cannot be accomplished via reasonable nondiscriminatory alternatives. *See*, *Energy Michigan, Inc v Daniel C. Scripps et al*, 658 F Supp 3d, 511 (E.D. Mich. 2023). On March 24, 2023, the plaintiffs filed a joint notice of appeal to the U.S. Court of Appeals for the Sixth Circuit. On January 16, 2025, the U.S. Court of Appeals reversed the District Court's judgment in favor of the Commission, finding that the LCR requirement was facially discriminatory in violation of the dormant Commerce Clause and remanding to the U.S. District Court to determine whether Michigan demonstrated that the LCR is the only means of achieving the goal of ensuring a reliable energy supply as a legitimate local purpose. *See*, *Energy Michigan, Inc v Michigan Pub Serv Comm*, 126 F4th 476, 501 (CA 6 2025). Given the remand to District Court, litigation regarding the LCR requirements remains pending at the federal level.

If an LRZ does not have enough resources to meet its seasonal requirements, the entire zone clears at the seasonal cost of new entry (seasonal CONE). For the 2026/2027 PY, seasonal CONE (in dollars per megawatt (MW)-day) is equal to $137,510 per MW-year divided by the number of days in the seasons experiencing a shortage in Zone 7. The Staff clarifies that this resource adequacy construct is based on probabilistic determinations and that failure to meet the requirements would not necessarily mean that the LRZ will experience a loss of load event. Staff Report, p. 10.

The Staff also describes various changes MISO is making, the first being MISO's recent filing before the FERC for revisions to MISO's demand response (DR) tariff, namely changes to DR participation rules, elimination of dual registration, and DR and emergency resource (DR/ER) reforms. *Id*., pp. 10-11. Also noted is that, during the 2025/2026 PY, MISO discovered an error in the software used for LOLE calculations that necessitated a financial adjustment for the 2025/2026 PY. *Id*., p. 11. MISO also submitted a proposal to FERC to revise its Module A Tariff definition of the term loss of load expectation to align it with the direct loss of load (DLOL) based methodology used to accredit resources. The proposal was accepted by FERC on October 24, 2025. *Id*., pp. 11-12.

Additionally, MISO intends to implement enhanced resource adequacy risk modeling and a DLOL accreditation methodology beginning in the 2028/2029 PY. The Staff Report describes how the DLOL changes will align the PRMR accreditation of all resource classes and that this continuing work has impacted some LSEs' capacity demonstration filings for the current compliance year (2029/2030). The December 18, 2025 order in Case No. U-21990 (December 18 order) approved special contracts (a primary supply agreement and an energy storage agreement) between DTE Electric and Green Chile Ventures LLC (GCV) to be supplied by 1.383 gigawatts (GW) of energy storage resources paid for by the customer, GCV. *See*, December 18 order, pp. 43-45. As part of its approval, the Commission directed DTE Electric 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. *Id*., p. 37. The company filed this analysis separately from its capacity demonstration filing.[7]

The Staff recommends that 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 for the 2028/2029 PY. Lastly, the Staff notes that changes to load, resources, and MISO procedures in future years can result in discrepancies between an LRZ having sufficient capacity to meet the requirements under Section 6w and not having enough capacity to meet MISO's requirements. Staff Report, p. 12.

Turning to the specifics of MISO Zone 7, the Staff provides a table showing the annual MISO LOLE report data, as well as another table showing a comparison of LRZ 7 aggregated resources demonstrated, plus known undemonstrated resources likely to still be available, for each season in the 2029/2030 PY and MISO's resource adequacy requirement for PY 2026/2027. *Id*., pp. 13-15. With the caveat that its findings are based on projections that are subject to change due to a number of factors including MISO's shift to a DLOL resource adequacy construct in the 2028/2029 PY, the Staff concludes that Zone 7 has a surplus of resources for the compliance year (2029/2030) compared to the projected LCR for all four seasons. For the interim years (2027/2028 and 2028/2029), the Staff Report states that while inclusive of several

[7] DTE Electric filed public and confidential versions of compliance filings on February 24, 2026, followed by a supplemental compliance filing on June 17, 2026. *See*, Case No. U-21907, filings #U-21907-0010, -0011, and -0059.

assumptions and subject to change, Zone 7 is projected to have a surplus of capacity across all four seasons. *Id*., pp. 16-17.

As to Zone 2, which encompasses most of Michigan's Upper Peninsula and parts of Wisconsin, the Staff notes that MISO does not define MW capacity import or export limits between states within the same MISO zone and therefore, the data available to the Staff is not comprehensive enough to project a zonal capacity position for Michigan's Zone 2 akin to Zone 7. However, the Staff was able to conclude that: (1) all Michigan LSEs in Zone 2 demonstrated sufficient capacity resources, and (2) the 2026 MISO PRA results indicated an installed capacity surplus in PY 2026/2027. The Staff also states that Zone 2 has CILs of 5,072 MW in summer; 6,050 MW in fall; 5,379 MW in winter; and 6,133 MW in spring. *Id*., p. 17.

Turning to Zone 1, which includes a small portion of Michigan's Upper Peninsula, the Staff reports that all Zone 1 LSEs demonstrated sufficient capacity obligations for the compliance year and that the 2026/2027 MISO PRA results show sufficient capacity for each season in PY 2026/2027 for Zone 1. *Id*.

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

The Staff also notes that I&M's customer choice cap was reset to 10% on February 1, 2019, pursuant to MCL 460.10a(1)(c) and the July 12, 2017 order in Case No. U-16090 (July 12 order). July 12 order, p. 3. I&M is responsible for providing capacity for its choice program, but if its suppliers opt to self-supply capacity, the company will need to include this in its FRR plan. The Staff adds that I&M had an application pending before the Commission in Case No. U-21968 at the time the Staff Report was filed, requesting *ex parte* authority to change the methodology for allocating the costs of current generation resources between its Michigan and Indiana jurisdictions.[8] Per the Staff Report, NERC categorizes PJM as having an elevated risk level post-2026 and a high-risk level post-2029, with resource additions not keeping up with generator retirements and demand growth, although recently approved generating resources with expedited interconnection were not included in the risk analysis. Staff Report, p. 19.

Lastly, the Staff notes delays in PJM's BRA schedule due to pending decisions from FERC related to the capacity auction. The Staff Report also provides the current BRA schedule, which is scheduled to take place every six months until the schedule is no longer delayed. Staff Report, pp. 18-19. According to the Staff Report:

> PJM introduced a more robust risk model, while simultaneously implementing the Effective Load Carry[ing] 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

[8] On April 30, 2026, the Commission issued an order in Case No. U-21968 (April 30 order) approving a settlement agreement that resolved all issues in I&M's case. The settlement agreement is available in the Case No. U-21968 for public viewing. *See*, April 30 order, Exhibit A.

> 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.

Id., p. 19. The Staff also notes several changes that PJM has made to its capacity market. *Id*., p. 20.

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

Explaining DR as an optional source of capacity, the Staff describes DR as having a prominent role in LSEs' integrated resource plan (IRP) filings and the Staff's obligation to complete a statewide study of DR potential in Michigan every five years, the most recent of which was issued on October 17, 2025. Also, the Commission approved the Michigan Integrated Resource Planning Parameters on December 18, 2025, in Case No. U-21867 that include provisions regarding including DR options in future IRPs. Consumers and DTE Electric included DR in their respective IRP filings and capacity demonstrations, and the Staff states that it will continue to monitor Consumers' and DTE Electric's DR programs as well as DR use across Michigan. *Id*., p. 21.

Noting the Commission's affirmation of an AES' ability to offer DR programs through curtailment service providers or third-party aggregators, the Staff states that it is aware of 115 ZRCs of DR offered into the 2026 MISO capacity market. The Staff continues to collaborate with LSEs to ensure that aggregated DR load modification is accounted for when dispatched on MISO's coincident peak and to monitor FERC Order 2222[9] discussions. *Id*., p. 21.

Compared to last year's capacity demonstration, the Staff reports an increase in the use of ZRC contracts in this year's demonstration and highlights that:

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

Id., p. 21.

Following a brief explanation of its process for accounting for AES load switching, which was made more complex with the change to the seasonal construct, the Staff states that it continues to see an increase in load switching among LSEs. *Id*., p. 22. As it has done previously, the Staff recommends that LSEs that include load switching information in their filing should also include it within the Contracted Resources section on the spreadsheet templates provided for the capacity demonstration for the demonstration years as well as the interim years. The Staff also recommends that both the losing and the gaining suppliers have

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[9] *Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators*, 172 FERC ¶ 61,247 (September 17, 2020). FERC issued subsequent versions of FERC Order 2222, namely FERC Order 2222-A and FERC Order 2222-B. *See*, 174 FERC ¶ 61,197 (March 18, 2021) and 175 FERC ¶ 61,227 (June 17, 2021), respectively. FERC Order 2222 is aimed at enabling distributed energy resources through aggregation to participate in the energy markets run by RTOs.

copies of the load switching affidavits in each of their filings, enabling the Staff to easily cross-reference that the load is being accounted for. *Id*.

Lastly, the Staff addresses capacity retirements and additions, noting that Michigan continues to follow national trends showing a tightening capacity position due to scheduled retirements outpacing replacement capacity and that several LSEs expressed concern about the availability of capacity. This trend can be attributed to several factors, including broad economic factors such as supply chain constraints, labor shortages, high component prices, and delays associated with obtaining permitting, regulatory approval, or interconnection queue delays. *Id*., p. 22. The Staff specifically points to delays in MISO's interconnection queue and explains that, to reduce congestion in the queue, MISO has filed a tariff with FERC to amend its generator interconnection procedures to establish an Expedited Resource Addition Study (ERAS) process. The Staff also states that 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. Staff Report, pp. 22-23.

The Staff also notes that a portion of the capacity from the Palisades Nuclear Power Plant (Palisades) was included in this year's demonstration starting in Spring 2026 and that, while the remainder of the capacity from Palisades is contracted to an LSE in Indiana, its capacity would still provide resource adequacy benefits to Zone 7. Also noted in the Staff Report, the J.H. Campbell Generation Station (Campbell Plant) is currently operating pursuant to an emergency order issued by the U.S. Department of Energy (DOE) but is not a MISO-registered capacity resource, and, therefore, its capacity is not counted toward meeting resource adequacy targets. *Id*., p. 23.

The Staff adds that the tightening capacity position could be exacerbated if demand increases faster than expected, for instance, from data centers and the electrification of the building and transportation sectors. Because the capacity demonstration process does not require LSEs to look at their load growth until four years out, the Staff recommends that the Commission consider including any load growth that could significantly impact an LSE's ability to serve that load in future capacity demonstration requirements. *Id*., p. 23. Explaining further, the Staff recounts that MISO's 2026 Long-Term Load Forecasting Results Summary (2026 Load Forecast) shows rising electricity demand (a 2% annual growth rate in 2026 compared to 1.6% in 2024) and continued change in the resource mix, and that Michigan's forecasted load growth reflects this trend as well.[10] Staff Report, p. 24.

The Staff also highlights a need for guidance from the Commission regarding a change made to align the state's capacity demonstration process with MISO's change to a seasonal resource adequacy construct. Per the Staff:

> 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).

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[10] Explaining Michigan's load growth further, the Staff also notes the submission of large load tariffs and special contract applications to the Commission in Case Nos. U-21990, U-21859, U-21986, and U-22058. Staff Report, p. 24.

Id.

The Staff expresses its uncertainty as to how the Commission would evaluate a filing from a provider who fell short of its capacity demonstration requirement if it is based on a higher peak load forecast than the current year's forecast. Such a case occurred in Case No. U-21775, and the Staff evaluated each filing based on the prompt year peak load forecast with the PRM percentage applied. Further:

> [t]he 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.

Id., pp. 24-25. Thus, in addition to its load growth consideration recommendation, the Staff posits that a possible solution is to set a forecasted threshold quantity or percentage of load growth that, if triggered, would require an LSE to demonstrate sufficient capacity to meet its projected obligations. *Id*., p. 25.

The Staff concludes by summarizing that all LSEs have complied with the capacity demonstration requirements for the 2029/2030 PY, expressing appreciation to the LSEs for their cooperation, and including the following list of recommendations to the Commission:

> 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 [peak load contribution]) 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.

Id., pp. 25-26.

<u>Discussion</u>

To begin, the Commission appreciates the efforts of the Staff in obtaining and analyzing the capacity information needed for this year's capacity demonstrations and for drafting the Staff Report, as well as the filing of the 2026 Statewide Energy Storage Target Calculation. The Commission also appreciates the cooperation of all Michigan LSEs for their capacity demonstration filings.

Before addressing the Staff Report, the Commission first notes, as it did in the August 21 order in last year's capacity demonstration docket, that on May 23, 2025, the DOE issued an emergency order to MISO in coordination with Consumers, pursuant to Section 202(c) of the Federal Power Act, to ensure that the Campbell Plant in West Olive, Michigan, remains available for operation to minimize any potential generation shortfall that could lead to unnecessary power outages. *See*, DOE Order No. 202-25-3 (May 23, 2025). The Campbell Plant was scheduled to cease operations on May 31, 2025. The Campbell Plant closure was planned for in Consumers' 2022 IRP and replacement capacity had been procured through the purchase of a natural gas fired power plant in 2023, extending the retirement dates for two other fossil fuel units, increasing demand side resources such as DR and energy waste reduction, and adding renewable energy and energy storage resources through 2040. *See*, June 23, 2022 order in Case No. U-21090, pp. 5, 95; *see also*, *id*., Exhibit A, pp. 4-5. Emergency orders under Section 202(c) are limited to not more than 90 days. The DOE subsequently issued additional 90-day emergency orders for the Campbell Plant on August 20, 2025, November 18, 2025, February 17, 2026, and May 18, 2026. *See*, DOE, Order 202-25-7 (August 20, 2025); Order 202-25-9 (November 18, 2025); Order 202-26-16 (February 17, 2026); and Order 202-26-22 (May 18, 2026).

As noted in the Staff Report, the Campbell Plant is currently operating, but because it is not a MISO-registered capacity resource, its capacity is not counted toward meeting resource adequacy targets. Staff Report, p. 23. As of the date of this order, a legal challenge initiated by the Michigan Department of Attorney General regarding the continued operation of the Campbell Plant is pending before the U.S. Court of Appeals for the District of Columbia. *See*, Petition for Review, *People of the State of Michigan v DOE et al*, No. 25-1159 (filed July 24, 2025).

Turning to the Staff Report, the Commission accepts the Staff Report's findings regarding resource adequacy in MISO LRZs 1, 2, and 7 and in the PJM market, the capacity demonstrations made by the LSEs, and the 2026 Statewide Energy Storage Target Calculation. The Commission also finds that the filings submitted by DTE Electric comply with the Commission's directive in the December 18 order. Based on the information filed by DTE Electric pursuant to the mandates in Case No. U-21990, the Commission finds that the company has shown that it possesses adequate resources in each season in the planning horizon both with and without the large load customer and the resources developed to serve it. The Staff states in this year's report that most LSEs included updates for the 2026/2027 PY through the 2028/2029 PY. For the upcoming capacity demonstration in Case No. U-22142, the Commission agrees with the Staff's recommendation for LSEs to continue providing this additional information and thus directs LSEs to provide capacity resource data for the prompt year (2027/2028) and interim years (2028/2029 and 2029/2030) in addition to the compliance year (2030/2031) data. The additional data is to be included in the upcoming February 24, March 3, and March 17, 2027 capacity demonstration filings in Case No. U-22142. The Staff shall then file its 2030/2031 PY capacity demonstration report in Case No. U-22142 no later than May 12, 2027.

As to the other recommendations made in the Staff Report, as it has done in previous years, the Commission agrees with the recommendations regarding the MECT screenshots and the load switching affidavits. Therefore, the Commission directs all LSEs to provide MECT screenshots of their prompt load obligations (PRMR/PLC) to facilitate the Storage Target calculation used to comply with Act 235. The Commission also directs any filing entity who includes load switching information in its capacity demonstration filing to include it within the Contracted Resources on the spreadsheet templates provided for the capacity demonstration for the demonstration years, as well as for the interim years. Additionally, both the losing and the gaining suppliers shall include copies of the load switching affidavits in each of their filings, allowing the Staff to cross check that the load is being accounted for.

Regarding Alpena's interpretation of the 5% limit on resources acquired from the PRA in the demonstration year, the Commission finds that the Capacity Demonstration Filing Process and Requirements document is not clear as to whether the 5% limit is to be applied to each season's total or to an annual total of resources. The Commission finds that this ambiguity is best resolved in a capacity demonstration workgroup, which is described in further detail below. The Staff shall present its interpretation of the 5% PRA limitation to the workgroup, allow LSEs to provide input on how the limit should be interpreted, and shall present to the Commission its recommendations for any changes to the Capacity Demonstration Filing Process and Requirements document in Case No. U-22142.

Similarly, the Commission finds that the Staff's recommendations regarding the timeline for implementing MISO's DLOL-based resource adequacy construct into Michigan's capacity demonstration process and the inclusion of load growth that would significantly impact an LSE's ability to serve that load in the capacity demonstration filing should also be addressed in the capacity demonstration workgroup. The Staff shall include these topics for discussion and input from LSEs in the workgroup and present to the Commission in Case No. U-22142 any resulting recommendations.

Accordingly, the Commission directs the Staff to commence a workgroup to address potential changes to the capacity demonstration process. The topics to be addressed in the workgroup shall include those discussed in this order as well as any other topic that the Staff deems necessary to improve upon and align the state's capacity demonstration process with the ongoing changes at MISO. The Commission leaves the specific date and time of the workgroup to the discretion of the Staff, with the directive that the timing of the workgroup should allow LSEs sufficient time to consider its discussions and any recommendations in their upcoming capacity demonstration filings for the 2030/2031 compliance year. The Staff shall provide notice of the workgroup to all LSEs required to make capacity demonstration filings and shall include in the notice details regarding the date, time, means to participate, and topics for discussion. The

Staff shall also include information regarding the workgroup on the Commission's capacity demonstration webpage.[11] Following the conclusion of the workgroup, the Staff shall file a report with any recommendations in the docket in Case No. U-22142 for the Commission's consideration.

THEREFORE, IT IS ORDERED that:

A. The Commission Staff's May 12, 2026 Capacity Demonstration Results Report and 2026 Statewide Energy Storage Target Calculation filed in Case No. U-21907 are accepted.

B. Electric utilities required to file capacity demonstrations pursuant to MCL 460.6w(8)(a) for the 2030/2031 planning year shall make that filing no later than 5:00 p.m. (Eastern time) on February 24 and March 3, 2027, in Case No. U-22142, as described in this order and in the Capacity Demonstration Filing Process and Requirements document attached to this order as Exhibit A. Load serving entities required to file capacity demonstrations pursuant to MCL 460.6w(8)(b) for the 2030/2031 planning year shall make that filing no later than 5:00 p.m. (Eastern time) on March 17, 2027, in Case No. U-22142. Electric utilities and load serving entities shall include in their respective filings capacity resource data for the prompt (2027/2028) and interim years (2028/2029 and 2029/2030) as well as the compliance year (2030/2031), as described in this order. Load serving entities required to file capacity demonstrations pursuant to MCL 460.6w(8) shall utilize the Capacity Demonstration Filing Process and Requirements document and the General Affidavit attached to this order as Exhibits A and B, respectively.

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[11] The Commission's capacity demonstration webpage is available at https://www.michigan.gov/mpsc/commission/workgroups/2016-energy-legislation/capacity-demonstration (last visited July 16, 2026).

C. The Commission Staff shall file a report analyzing the sufficiency of the capacity demonstrations for the 2030/2031 planning year no later than 5:00 p.m. (Eastern time) on May 12, 2027, in Case No. U-22142.

D. The Commission Staff shall file in Case No. U-22142 the update to the energy storage capacity amounts for electric providers using the Statewide Energy Storage Target Calculation within 30 days after the completion of the capacity demonstrations for the 2030/2031 planning year required under MCL 460.6w.

E. Any load serving entity required to file capacity demonstrations pursuant to MCL 460.6w(8) for the 2030/2031 planning year shall provide a Module E Capacity Tracking screenshot (or equivalent) of its respective prompt load obligations (planning reserve margin requirement/peak load contribution) to facilitate the energy storage target calculation used to comply with Public Act 235 of 2023, MCL 460.1001 *et seq*., as described in this order.

F. Any load serving entity that includes load switching information in its capacity demonstration filing shall include it within the Contracted Resources section on the spreadsheet templates provided for the capacity demonstration for the demonstration years as well as the interim years. Both the losing and the gaining suppliers in the load switching arrangement shall include copies of the AES Load Switching Affidavit, attached to this order as Exhibit C, in their respective capacity demonstration filings.

G. The Commission Staff shall convene, with notice to all load serving entities required to make capacity demonstration filings pursuant to Section 6w(8)(a) and (b) of Public Act 235 of 2023, MCL 460.6w(8), a workgroup to discuss potential changes to the capacity demonstration process and shall file a report with any recommendations to the Commission in Case No. U-22142, as described in this order.

H. The docket in Case No. U-21907 is closed, and the docket in Case No. U-22142 is opened for the purpose of receiving the capacity demonstration filings for the 2030/2031 planning year and the Statewide Energy Storage Target Calculations to be filed by the Commission Staff.

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

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, pursuant to MCL 462.26. To comply with the Michigan Rules of Court's requirement to notify the Commission of an appeal, appellants shall send required notices to both the Commission's Executive Secretary and to the Commission's Legal Counsel. Electronic notifications should be sent to the Executive Secretary at LARA-MPSC-Edockets@michigan.gov and to the Michigan Department of Attorney General - Public Service Division at sheac1@michigan.gov. In lieu of electronic submissions, paper copies of such notifications may be sent to the Executive Secretary and the Attorney General - Public Service Division at 7109 W. Saginaw Hwy., Lansing, MI 48917.

MICHIGAN PUBLIC SERVICE COMMISSION

Daniel C. Scripps, Chair

Katherine L. Peretick, Commissioner

Shaquila Myers, Commissioner

By its action of July 16, 2026.

Lisa Felice, Executive Secretary

PROOF OF SERVICE

STATE OF MICHIGAN)

Case No. U-21907 *et al.*

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on July 16, 2026 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 16th day of July 2026.

Angela P. Sanderson

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

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