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 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 August 27, 2026 meeting of the Michigan Public Service Commission in Lansing, Michigan.

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

ORDER

In 2019, the Commission, with the support of Governor Gretchen Whitmer, launched MI Power Grid, a multi-year initiative to maximize the benefits of the transition to clean distributed energy resources for Michigan residents and businesses. *See*, October 17, 2019 order in Case No. U-20645. Three areas of focus make up the MI Power Grid initiative: optimizing grid investments and performance, customer engagement, and integrating emerging technologies. Competitive procurement of new resources falls under the integrating emerging technologies area of focus. To advance competitive procurement for new resources, the Commission opened this docket with the August 20, 2020 order in this case, directing the Commission Staff (Staff) to convene a workgroup with the participation of rate-regulated utilities and interested persons to develop competitive bidding guidelines. Following a collaborative process and multiple comment periods, the Commission ultimately approved the Competitive Procurement Guidelines for Rate-Regulated Electric Utilities (Not for PURPA Compliance)[1] (Competitive Procurement Guidelines). *See*, September 9, 2021 order in Case No. U-20852, p. 28; *see also*, *id*., Exhibit A. In recognition of the potential need for future improvements and modifications, the Commission also directed the Staff to file a report in this docket by September 9, 2026 (or sooner, if needed), detailing any recommendations for changes to the Competitive Procurement Guidelines. *Id*., p. 29.

On November 28, 2023, Governor Whitmer signed into law Public Act 235 of 2023 (Act 235), which, among other things, amended Sections 22 through 49 of Public Act 342 of 2016 to increase the renewable portfolio standards (RPS) for electric providers from 15% through 2029, to 50% in 2030 through 2034, and 60% in 2035, and each year thereafter. MCL 460.1028(1). Act 235 took effect on February 27, 2024. Act 235 also provided that the Commission shall authorize a financial incentive, referred to as a financial compensation mechanism (FCM), for electric providers that enter into power purchase agreements (PPAs) for renewable energy resources or third-party contracts for energy storage systems or clean energy storage systems with non-affiliated third parties. The FCM applies to any contract executed after June 30, 2024. MCL 460.1028(8). The enactment of Act 235 has prompted an increase and acceleration in renewable energy resources into rate-regulated utilities' generation portfolios, which in turn has led to a concern that the Competitive Procurement Guidelines need to do more to ensure the fair consideration of third-party resources.

This concern was raised specifically in Consumers Energy Company's (Consumers') amended renewable energy plan (REP) case, Case No. U-21816, by the Michigan Energy Innovation

[1] PURPA stands for the Public Utility Regulatory Policies Act of 1978, Pub L No. 95-617, 92 Stat 3117.

Business Council, Institute for Energy Innovation, and Advanced Energy United (collectively, MEIU), along with the Staff. In that case, MEIU advocated for a 50/50 company-ownership and third-party PPA split and for the use of independent administrators in the competitive bidding process, and the Staff contended that allowing third parties to bid into and complete requests for proposals (RFPs) coupled with adherence to the Competitive Procurement Guidelines would ensure cost-effective renewable procurement. In the September 11, 2025 order in Case No. U-21816 (September 11 order), the Commission acknowledged MEIU's concern that simply providing an opportunity for third parties to bid into RFPs is not sufficient to encourage competition and to ensure the procurement of cost-effective renewables. As such, the Commission announced its intention to expedite the review and revision of the Competitive Procurement Guidelines to ensure that resources are procured in a fair and competitive manner. September 11 order, p. 45.

Accordingly, on April 30, 2026, the Commission issued an order in the instant case (April 30 order) directing the Staff to convene a workgroup to conduct a review and revision of the Competitive Procurement Guidelines to ensure that renewable energy resources are procured in a fair and competitive manner with adequate opportunity for third parties to participate in the competitive bidding process. Additionally, the Commission directed the Staff, upon conclusion of the workgroup and taking into consideration the feedback of the workgroup participants, to file a revised draft of the Competitive Procurement Guidelines. In accordance with the April 30 order, the Staff convened a workgroup on June 15, 2026, at which the Staff, MEIU, Michigan Electric & Gas Association, DTE Electric Company (DTE Electric), and Consumers gave presentations. Informal comments regarding the updated Competitive Procurement Guidelines were solicited by the Staff and received by July 15, 2026, from 5 Lakes Energy LLC; Consumers; DTE Electric;

Indiana Michigan Power Company; Michigan Biomass; Michigan Climate Jobs; and MEIU. The presentations and informal comments were posted to the Commission's webpage for the workgroup.[2] The Staff then posted a revised draft of the Competitive Procurement Guidelines (a clean copy and a redline copy) to the workgroup's webpage.[3]

Discussion

To begin, the Commission thanks the Staff and the participants in the workgroup for their time and contributions towards revising the Competitive Procurement Guidelines to ensure that third-party resources are properly and fairly considered in the competitive procurement of renewable energy resources to meet the state's increasing RPS requirement.

As indicated in the April 30 order, the Commission now invites interested persons to file comments in this docket on the revised draft Competitive Procurement Guidelines. Any person may submit written initial and reply comments on the revised draft Competitive Procurement Guidelines. All comments should be paginated and must reference Case No. U-20852. Initial comments must be received no later than 5:00 p.m. (Eastern time (ET)) on October 1, 2026, and reply comments must be received no later than 5:00 p.m. (ET) on October 16, 2026. Written comments should be mailed to: Executive Secretary, Michigan Public Service Commission, P.O. Box 30221, Lansing, Michigan 48909. Comments submitted in electronic format may be filed via the Commission's E-Dockets website or, for those persons without an E-Dockets account, via

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[2] The workgroup webpage is available at https://www.michigan.gov/mpsc/commission/workgroups/competitive-procurement (last visited August 24, 2026).

[3] The revised draft is available at https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00002M7ej6AAB (last visited August 24, 2026).

email to LARA-MPSC-Edockets@michigan.gov, or via the Submit Comments option located within the E-Docket file for the case. Any person requiring assistance prior to filing comments may contact the Staff at (517) 284-8090. All filed comments will become public information available on the Commission's E-Dockets website (either under the Filings or Case Comments section) and will be subject to disclosure.

The Commission clarifies that the revised draft Competitive Procurement Guidelines, posted to the workgroup webpage and attached to this order as Exhibit A, do not constitute the final revised guidelines approved by the Commission. Electric providers shall continue to use the existing Competitive Procurement Guidelines for current and ongoing solicitations. The Commission further clarifies that any revised Competitive Procurement Guidelines that are approved as a result of this process will apply on a prospective basis to new solicitations going forward.

THEREFORE, IT IS ORDERED that any interested person may file comments regarding the revised draft Competitive Procurement Guidelines for Rate-Regulated Electric Utilities (Not for PURPA Compliance), attached to this order as Exhibit A. Initial comments must be received no later than 5:00 p.m. (Eastern time) on October 1, 2026, and reply comments must be received no later than 5:00 p.m. (Eastern time) on October 16, 2026.

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 August 27, 2026.

Lisa Felice, Executive Secretary

Straw Proposal for Case No. U-20852

Competitive Procurement Guidelines for Rate-Regulated Electric Utilities

Definitions:

Competitive Procurement – A process in which the utility solicits and ultimately contracts for, owns or builds any combination of energy, capacity, Renewable Energy Credits (REC), ancillary services, generating assets or storage assets through a Request for Proposal (RFP) process.

Independent Monitor (IM) – A non-affiliated, unbiased entity hired by the utility or Commission to work with the utility and help develop the competitive procurement process. This entity does not necessarily score proposals resulting from an RFP but may help with scoring at the utility's discretion.

Independent Administrator (IA) - A non-affiliated, unbiased entity hired by the utility- without an economic interest in the outcome of the solicitation to work with the utility and help develop the competitive procurement process. This entity should have final scoring approval for proposals resulting from an RFP and will communicate these results to the utility by redacting any of the bidder's identifying information until such time the utility enters negotiations with the bidders.

Background: In 2019, the Commission launched the MI Power Grid initiative to maximize the benefits of the transition to clean distributed energy resources for Michigan residents and businesses. Competitive procurement fell under the integrating emerging technologies area of focus through that initiative. In an August 20, 2020, Order in Case No. U-20852, the Commission directed Commission Staff (Staff) to convene a competitive bidding collaborative with the objective of developing guidelines that ensure strong, technology-neutral market response and value to ratepayers, through transparent, non-discriminatory access, certainty and fairness in bidding processes. Through the workgroup process and several rounds of comments, the Commission ultimately adopted the competitive procurement guidelines in its September 9, 2021, Order in Case No. U-20852. In this same Order, the Commission stated that Staff shall issue a survey to rate-regulated utilities, developers, and stakeholders to obtain feedback regarding the performance of the competitive procurement guidelines and any suggested improvements or modifications no later than September 9, 2026. This is intended to capture these improvements, modifications and updates.

Objective: This guidance document will be used by the Commission to ensure strong, ownership-neutral solicitation responses providing value for customers through transparency, non-discriminatory access, certainty, and fairness in bidding processes that also provides participants with confidence in the process. When utilized by utilities, it is presumed that resulting projects and contracts are reasonable and prudent. In the event utilities diverge from the guidance included in this document, it is expected the utility will provide sufficient justification in order to receive Commission approval and cost recovery of contracts that result from the solicitation. The guidance document is intended to provide utilities with clarity regarding Commission expectations and respondents with confidence in the process. Thus, in considering the guidelines contained therein for competitive solicitations, the fundamental principles of minimizing customer costs, maximizing customer value, and ensuring reasonable rates are paramount.

This guidance will be utilized when the utility intends to use competitive solicitation as the means for resource procurement.

PURPA Applicability: If competitive procurement is used to establish avoided cost, the utility shall use a process that conforms to the Allegheny Principles Supply Co, LLC, 108 FERC 61082 (2004) and shall use an IA in accordance with FERC Order 872.

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Guiding Principles: When making determinations of the reasonableness and prudence of all applicable utility energy and capacity resource procurements, the following guidelines will be used in the Commission's evaluation of the process and resulting bids. This will include resources necessary for Voluntary Green Pricing Programs, Renewable Portfolio Standards, to inform IRPs or as a result of IRPs, Clean Portfolio Standards, Energy Storage Targets and other competitive procurement activities deemed appropriate by the Commission.

These guidelines do not apply to energy waste reduction, other demand-side tariff programs or tariff-based activities administered by utilities or short-term market purchases. In addition, these guidelines are not intended to restrict the utility's ability to procure resources without use of the Competitive Procurement process in certain situations, such as, but not limited to, where authorized by law.

Guidelines:

1. All long-term resources, including utility self-build projects, should be procured through competitive procurement. Bidding processes may be tailored based on the specific energy, capacity resource, renewable portfolio or clean energy portfolio needs as identified in the IRP or other planning process, but should not be designed in a way that would exclude cost-competitive options or other projects not specifically identified in the IRP or other planning process and should appropriately value resources that are already constructed but not under contract when compared to resources that require new construction.
2. Oversight and independence of bidding process:

    a. If the utility affiliates are responding to an RFP through submission of a bid, the utility affiliate must use separate staffing This includes a prohibition on information sharing between utility affiliates personnel or utility affiliates responding to the RFP (submitting bids) and utility personnel involved in any aspect of the RFP process (such as design and preparation of the RFP, scoring/evaluation of results, or contract negotiation).
        i. A description of this requirement and steps the utility intends to take to implement will be included in the RFP documents.
    b. It is preferred that an IA conducts all aspects of the Competitive Procurement process, including scoring of proposals, especially if a utility or its affiliate intends to bid a self-build project into the utility's competitive solicitation.
        i. If the utility intends to conduct a Competitive Procurement process to set avoided costs under PURPA, an IA must be used in accordance with FERC Order 872.

c. The utility will coordinate with Staff and stakeholders in the development of the RFP prior to the pre-RFP meeting. The utility will work with Staff and stakeholders in the development of the scoring sheet and allow for review of the process used to evaluate and select proposals. Staff shall have full access to all redacted information from the utility IA or IM. In addition, the utility will make utility staff, the IA or IM, and all unredacted proposals and scoresheets available to Staff so that it may conduct a review and audit of the process prior to the Commission's decision on the application filed for approval of contracts.

   i. The utility will release and make available a draft RFP and solicitation documents at least 10 days prior to the pre-RFP meeting.
   ii. At least 30 days prior to issuance of an RFP the utility will host a pre-RFP meeting with Staff and potential bidders to lay out the timeline associated with each solicitation. The utility will present draft solicitation documents (including an explanation of each non-price factor to be considered if applicable and its definition, criteria, value, score, quantification, relative importance, or weighting). The utility will allow potential bidders and Staff to ask questions of the utility, provide comments or suggested edits to the solicitation documents and take written comments due no later than 10 business days after the pre-RFP meeting. The utility will share these comments with Staff.
   iii. The utility will arrange a post-RFP meeting with Staff and the IA or IM in which the selection process and scoring of any non-price factors are detailed.
   iv. If the utility does use an IM, the IM will work with the utility to design the solicitation, administer the stakeholder process, and review the evaluation of bids prior to the utility's selection. The utility will provide access to all information necessary for the IM to effectively carry out its roles and responsibilities.
   v. If the utility utilizes an IA or if the results of the solicitation are intended to establish PURPA avoided cost, the following applies::
      1. The IA shall score the proposals and provide recommendations that could be considered for Commission review. The IA will work with the utility to design the solicitation, administer bidding, and evaluate bids prior to the utility's selection and if used for the establishment of a PURPA avoided cost shall be consistent with the oversight principles set out in *Allegheny Energy Supply Co, LLC,* 108 FERC 61082 (2004)).
      2. The utility will provide access to all information for the IA to effectively carry out its roles and responsibilities.
      3. The IA will remove from the bid-data provided to the utility any non-essential information which might reveal the identity of the bidder.
      4. The IA will provide the utility with sufficient information to conduct a thorough internal review without disclosing the bidder's identity.

5. The IA will provide scores for all subjective factors, such as the ability of the bidder to complete the project on time, financial health and credit worthiness of bidder, experience, etc.

6. The IA will produce a ranked list of bid projects, based on the RFP's evaluation factors, weighting, and scoring sheets that includes non-price factors, for review by the utility and the Staff.

3. Open, non-discriminatory treatment of resources:
    a. Conduct an open, non-discriminatory procurement process that fairly considers different ownership structures, applicable resource types or combinations of resource types, sizes/capacities including interconnection levels, ancillary services and grid benefits with transparency on how they will be evaluated. In doing so, the utility may consider any additional benefits that may not be reflected in project pricing but shall make these considerations clear in the solicitation documents released to bidders.
    b. To facilitate bidding and comparison of multiple resource types, utilities are encouraged to specify the energy characteristics that are necessary to provide reliable resource supply needed to meet utility load and any specific resources necessary to ensure bids meet any applicable Michigan renewable, clean standards and storage targets contained in PA 235 of 2023 as well as reliability and resilience that are sought by the solicitation.
    c. Bidding is open to all applicable resources and solutions that can meet relevant system and program needs (e.g., fuel source, RECs, combinations of resources including distributed energy resources, ancillary services, etc.).
4. Minimum RFP requirements and specification of evaluation criteria:
    a. Minimum eligibility requirements for bidders and resources will be identified with or prior to the release of the RFP.
    b. Price and non-price factors and weighting to be used for project selection will be identified with or prior to the release of the RFP (RFP to include scoring sheets with applicable weighting of evaluation factors). Price factors include energy, capacity, ancillary services, RECs or other market values not included in energy costs, and adjusted loss factors. Non-price factors may include but are not limited to, consideration and incentivization of ancillary environmental and community benefits, brownfield redevelopment, pollinator habitat, local jobs, union labor as required by law, land usage and overall footprint, facilities that provide a quantifiable public or environmental service, dispatchability as a clean or renewable resource, and other factors that provide benefit to the utility, ratepayers, or other citizens of Michigan. However non-price factors should not unduly bias the RFP against existing resources that are not under contract and should consider the benefit of utilizing resources that do not have the risk of implementation that may exist with the construction of new resources.
        i. Each non-price factor and its criteria, value, score, quantity, relative importance, or weighting should be, justified, and determined between solicitations. Before proposals are received, the criteria must be clearly specified, defined, explained, justified, and supported so that respondents to an RFP may credibly assess project costs based on both price and non-price factors and evaluate non-price traits of various alternatives.

c. Templates of Power Purchase Agreement (PPA), Build Transfer Agreement (BTA), or any other contracts with terms and conditions and identification of what terms and conditions are non-negotiable.
d. If known, consideration of risk associated with siting, interconnection delays, and cost risks due to market volatility of commodities needed to construct the project and consideration of out-of-state resources. To the extent practical, include any risk adjustments in scoring sheets.
e. If known, consideration of transmission and distribution availability and constraints, including treatment of transmission congestion costs and inter-zonal pricing risk.
f. If known, consideration of operational limitations or benefits associated with the transmission or distribution interconnection type, consideration of transmission and distribution benefits, including reductions in transmission congestion and loss costs, reduced distribution system losses, deferred or avoided transmission or distribution investments, existing resource interconnection, and other locational benefits as applicable.
g. Provide reasonable consideration of technology benefits that may include resources with long duration resiliency benefits, localized low-income county economic benefits, dispatchability as a clean or renewable resource, existing construction or resources, resource diversity, or other quantifiable benefits.
h. As applicable, identify the parameters for inclusion of a financial compensation mechanism, terminal value analysis, or any other adjustment factor for all projects. If a terminal value analysis is conducted, the terminal value for each bid will be calculated as the levelized cost of energy price of the project bid in the RFP.No terminal value analysis is required if any of the following are met:
    i. A respondent submits a PPA with a term equal to the presumed useful life of the assets over which the utility amortizes its capital costs (i.e., 35 years); or
    ii. The guaranteed BTA or company-owned project cost recovery period is limited to the PPA term (i.e., 20 years); or
    iii. A respondent provides the utility the opportunity, at the respondent's discretion, to purchase the project for a firm amount, which shall be a price that the respondent reasonably believes, based on facts and circumstances at the time the price is determined, will at least be fair market value at exercise, provided that at the time of purchase, the firm amount is equal to or greater than the fair market value and included in the cost comparisons at the time of initial consideration through the procurement process.
    iv. Other options identified in a pre-RFP conference.
i. As applicable, assumptions for tariff risks, state and federal tax credits, or other incentives for all projects.
j. To the extent practical, the terms and conditions for PPA bids should mirror those for BTA contracts or other contracts resulting from procurements and should not include unequal reserve or other requirements.
k. To the extent that the RFP bidder is constructing a new resource, a commitment by the RFP bidder to comply with the Michigan Labor Standards as directed by Public Act 231

of 2023 and Public Act 10 of 2023. This commitment should be identified by the utility in the RFP and included in contract language upon the project contract execution.

   l. The RFP will indicate the duration (years) over which the bid's price and non-price factors will be evaluated. Allowable durations for bids for PPAs will include an option to bid a PPA lasting for the full evaluation period (for example, if projects are evaluated over 35 years, bidders could bid a 35-year PPA).
   m. The RFP and template PPA will not include terms and conditions which are unreasonable, unusual in the industry, or would unreasonably favor the utility or its affiliate(s).
5. Code of conduct compliance:
   a. All code of conduct rules shall be followed. Utility shall document compliance with the Code of Conduct for any award to an affiliate and shall include such documentation when it files for approval.
   b. RFP clearing price shall be used to determine "market price" in affiliate transactions for resource supply pursuant to MPSC code of conduct rules.
   c. The utility is strongly urged to utilize an IA when allowing affiliates to bid.
6. Ensure the competitive bidding process aligns with resource planning and various project/contract approval processes, including requirements in MCL 460.6t(6).

Straw Proposal for Case No. U-20852

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Independent Administrator (IA) - A non-affiliated, unbiased entity hired by the utility, without an economic interest in the outcome of the solicitation, to work with the utility and help develop the competitive procurement process. This entity ~~will~~ should have final scoring ~~responsibility~~ approval for proposals resulting from an RFP and will communicate these results to the utility by redacting any of the bidder's identifying information until such time the utility enters negotiations with the bidders.

Background: In 2019, the Commission launched the MI Power Grid initiative to maximize the benefits of the transition to clean distributed energy resources for Michigan residents and businesses. Competitive procurement fell under the integrating emerging technologies area of focus through that initiative. In an August 20, 2020, Order in Case No. U-20852, the Commission directed Commission Staff (Staff) to convene a competitive bidding collaborative with the objective of developing guidelines that ensure strong, technology-neutral market response and value to ratepayers, through transparent, non-discriminatory access, certainty and fairness in bidding processes. Through the workgroup process and several rounds of comments, the Commission ultimately adopted the competitive procurement guidelines in its September 9, 2021, Order in Case No. U-20852. In this same Order, the Commission stated that Staff shall issue a survey to rate-regulated utilities, developers, and stakeholders to obtain feedback regarding the performance of the competitive procurement guidelines and any suggested improvements or modifications no later than September 9, 2026. This ~~document will serve as the starting point for~~ is intended to capture these improvements, modifications and updates.

Objective: This guidance document will be used by the Commission to ensure strong, ownership-neutral ~~market~~ solicitation responses providing ~~and~~ value for customers through transparency, non-discriminatory access, certainty, and fairness in bidding processes that also provides participants with confidence in the process. When utilized by utilities, it is presumed that resulting projects and contracts are reasonable and prudent. In the event utilities diverge from the guidance included in this document, it is expected the utility will provide sufficient justification in order to receive Commission approval and cost recovery of contracts that result from the solicitation. The guidance document is intended to provide utilities with clarity regarding Commission expectations and respondents with confidence in the process. Thus, in considering the guidelines contained therein for competitive solicitations, the fundamental principles of minimizing customer costs, maximizing customer value, and ensuring reasonable rates are paramount.

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This guidance will be utilized when the utility intends to use competitive solicitation as the means for resource procurement. ~~If the utility intends to allow PURPA Qualifying Facility (QF) projects to bid into a solicitation, see the "PURPA Applicability" section below. These guidelines also allow for the continued refinement of bidding processes over time based on feedback from bidders, the Commission, and stakeholders.~~

PURPA Applicability: ~~This process conforms to the~~If competitive procurement is used to establish avoided cost, the utility shall use a process that conforms to the Allegheny Principles Supply Co, LLC, 108 FERC 61082 (2004) ~~and will serve as the means for establishing the utility's PURPA avoided costs. Should a utility allow PURPA QF projects to bid into a solicitation~~and shall ~~, the utility must~~ use an IA in accordance with FERC Order 872. ~~In the event a competitive solicitation concludes with unfilled capacity and the utility has unfilled capacity pursuant to the utility's most recently approved Integrated Resource Plan (IRP), the utility may make this unfilled capacity available to PURPA QFs at the approved PURPA avoided cost established by the Commission. This guidance should allow for the continued refinement of bidding processes over time based on feedback from bidders, the Commission, and stakeholders.~~

~~If a QF is not selected under such a competitive solicitation, it is entitled to a PURPA avoided energy rate outside of the competitive solicitation and would receive a capacity rate as applicable~~.

Guiding Principles: When making determinations of the reasonableness and prudence of all applicable utility energy and capacity resource ~~arrangements and~~ procurements, the following guidelines will be used in the Commission's evaluation of the process and resulting bids. This will include resources necessary for Voluntary Green Pricing Programs, Renewable Portfolio Standards, to inform IRPs or as a result of IRPs, Clean Portfolio Standards, Energy Storage Targets and other competitive procurement activities deemed appropriate by the Commission.

These guidelines do not apply to energy waste reduction, other demand-side tariff programs or tariff-based activities administered by utilities or short-term market purchases. In addition, these guidelines are not intended to restrict the utility's ability to procure resources without use of the Competitive Procurement process in certain situations, such as, but not limited to, where authorized by law.

Guidelines:

1. All long-term resources, including utility self-build projects, ~~are~~ should be ~~arranged~~ procured through competitive procurement. Bidding processes may be tailored based on the specific energy, capacity resource, renewable portfolio or clean energy portfolio needs as identified in the IRP or other planning process, but should not be designed in a way that would exclude cost-competitive options or other projects not specifically identified in the IRP or other planning process and should appropriately value resources that are already constructed but not under contract when compared to resources that require new construction.
2. Oversight and independence of bidding process:
    - ~~a.~~ ~~Requires separate staffing and information sharing between utility personnel or utility affiliate responding to RFP (submitting bids) and utility personnel involved in any aspect of the RFP process (preparation of RFP, scoring/evaluation of results, and contract negotiation).~~

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~~b.~~a. If the utility affiliates are responding to an RFP through submission of a bid, the utility affiliate must use separate staffing. This includes a prohibition on information sharing between utility affiliates personnel or utility affiliates responding to the RFP (submitting bids) and utility personnel involved in any aspect of the RFP process (such as design and preparation of the RFP, scoring/evaluation of results, or contract negotiation).

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~~c.~~b. It is preferred that an IA conducts all aspects of the Competitive Procurement process, including scoring of proposals, especially if a utility or its affiliate intends to bid a self-build project into the utility's competitive solicitation.

i. If the utility intends to conduct a Competitive Procurement process to set avoided costs under PURPA, an IA must be used in accordance with FERC Order 872.

~~It is preferred that there is use of an IA that conducts all aspects of the competitive procurement process, including the scoring of proposals, especially if a utility intends to bid a self-build project into the utility's competitive solicitation. If a utility allows PURPA QF projects to bid into a solicitation, the use of an IA is required in accordance with FERC Order 872.~~

c. The utility will coordinate with Staff and stakeholders in the development of the RFP prior to the pre-RFP meeting. The utility will work with Staff and stakeholders in the development of the scoring sheet and allow for review of the process used to evaluate and select proposals. Staff shall have full access to all redacted information from the utility IA or IM. In addition, the utility will make utility staff, the IA or IM, and all unredacted proposals and scoresheets available to Staff so that it may conduct a review and audit of the process prior to the Commission's decision on the application filed for approval of contracts.

~~ii.~~i. The utility will release and make available a draft RFP and solicitation documents at least 10 days prior to the pre-RFP meeting.

~~iii.~~ii. At least 30 days prior to issuance of an RFP the utility will host a pre-RFP meeting with Staff and potential bidders to lay out the timeline associated with each solicitation. The utility will present draft solicitation documents (including an explanation of each non-price factor to be considered if applicable ~~as well~~and its ~~as its~~ definition, criteria, value, score, quantification, relative importance, or weighting). The utility will allow potential bidders and Staff to ask questions of the utility, provide comments or suggested edits to the solicitation documents and take written comments due no later than ~~10~~ 10 business days after the pre-RFP meeting. The utility will share these comments with Staff.

~~iv.~~iii. The utility will arrange a post-RFP meeting with Staff and the IA or IM in which the selection process and scoring of any non-price factors ~~is~~are detailed.

~~v.~~iv. If the utility does use an IM, the IM will work with the utility to design the solicitation, administer ~~bidding~~the stakeholder process, and ~~evaluate~~ review the evaluation of bids prior to the utility's selection. The utility will provide

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access to all information necessary for the IM to effectively carry out its roles and responsibilities.

~~vi~~v. If the utility utilizes an IA or if ~~PURPA QF projects~~the results of the solicitation are intended to establish PURPA avoided cost ~~are allowed to bid into a solicitation~~, the following applies:~~also applies~~:

1. The IA shall score the proposals and provide recommendations that could be considered for Commission review. The IA will work with the utility to design the solicitation, administer bidding, and evaluate bids prior to the utility's selection and if used for the establishment of a PURPA avoided cost shall be consistent with the oversight principles set out in *Allegheny Energy Supply Co, LLC,* 108 FERC 61082 (2004)).
2. The utility will provide access to all information for the IA to effectively carry out its roles and responsibilities.
3. The IA will remove from the bid-data provided to the utility any non-essential information which might reveal the identity of the bidder.
4. The IA will provide the utility with sufficient information to conduct a thorough internal review without disclosing the bidder's identity.
5. The IA will provide scores for all subjective factors, such as the ability of the bidder to complete the project on time, financial health and credit worthiness of bidder, experience, etc.

~~vii.~~ 6. The IA will produce a ranked list of bid projects, based on the RFP's evaluation factors, weighting, and scoring sheets that includes non-price factors, for review by the utility and the Staff.

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3. Open, non-discriminatory treatment of resources:
   a. Conduct an open, non-discriminatory procurement process that fairly considers different ownership structures, applicable resource types or combinations of resource types, sizes/capacities including interconnection levels, ancillary services and grid benefits with transparency on how they will be evaluated. In doing so, the utility may consider any additional benefits that may not be reflected in project pricing but shall make these considerations clear in the solicitation documents released to bidders.
   b. To facilitate bidding and comparison of multiple resource types, utilities are encouraged to specify the energy characteristics that are necessary to provide reliable resource supply needed to meet utility load and any specific resources necessary to ensure bids meet any applicable Michigan renewable, clean standards and storage targets contained in PA 235 of 2023 as well as reliability and resilience that are sought by the solicitation.
   c. Bidding is open to all applicable resources and solutions that can meet relevant system and program needs (e.g., fuel source, RECs, combinations of resources including distributed energy resources, ancillary services, etc.).
4. Minimum RFP requirements and specification of evaluation criteria:
   a. Minimum eligibility requirements for bidders and resources will be identified with or prior to the release of the RFP.
   b. Price and non-price factors and weighting to be used for project selection will be identified with or prior to the release of the RFP (RFP to include scoring sheets with

applicable weighting of evaluation factors). Price factors include energy, capacity, ancillary services, RECs or other market values not included in energy costs, and adjusted loss factors. Non-price factors may include but are not limited to, consideration and incentivization of ancillary environmental and community benefits, brownfield redevelopment, pollinator habitat, local jobs, union labor as required by law, land usage and overall footprint, facilities that provide a quantifiable public or environmental service, dispatchability as a clean or renewable resource, and other factors that provide benefit to the utility, ratepayers, or other citizens of Michigan. However non-price factors should not unduly bias the RFP against existing resources that are not under contract and should consider the benefit of utilizing resources that do not have the risk of implementation that may exist with the construction of new resources.

   i. Each non-price factor and its criteria, value, score, quantity, relative importance, or weighting should be ~~standardized~~, justified, and determined between solicitations. Before ~~bidding begins~~proposals are received, the criteria must be clearly specified, defined, explained, justified, and supported so that respondents to an RFP may credibly assess project costs based on both price and non-price factors and evaluate non-price traits of various alternatives.

c. Templates of Power Purchase Agreement (PPA), Build Transfer Agreement (BTA), or any other ~~contractual~~ contracts ~~arrangement~~ with terms and conditions and identification of what terms and conditions are non-negotiable.

d. If known, consideration of risk associated with siting, interconnection delays, and cost risks due to market volatility of commodities needed to construct the project and consideration of out-of-state resources. To the extent practical, include any risk adjustments in scoring sheets.

e. If known, consideration of transmission and distribution availability and constraints, including treatment of transmission congestion costs and inter-zonal pricing risk.

f. If known, consideration of operational limitations or benefits associated with the transmission or distribution interconnection type, consideration of transmission and distribution benefits, including reductions in transmission congestion and loss costs, reduced distribution system losses, deferred or avoided transmission or distribution investments, existing resource interconnection, and other locational benefits as applicable.

g. Provide reasonable consideration of technology benefits that may include resources with long duration resiliency benefits, localized low-income county economic benefits, dispatchability as a clean or renewable resource, existing construction or resources ~~thereby minimizing land development~~, resource diversity, or other quantifiable benefits.

h. As applicable, identify the parameters for inclusion of a financial compensation mechanism, terminal value analysis, or any other adjustment factor for all projects. If a terminal value analysis is conducted, the terminal value for each bid will be calculated as the levelized cost of energy price of the project bid in the RFP. ~~If a~~No terminal value analysis is ~~conducted~~required if~~, it must meet one the~~ any of the following are met ~~following requirements~~:

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i. A respondent submits a PPA with a term ~~is~~ equal to the presumed useful life of the assets over which the utility amortizes its capital costs (i.e., 35 years); or

~~ii. PPA contracts include the option, at the mutual agreement of both parties, to extend the initial PPA term (i.e., 20 years) for an additional term (i.e., 15 years); or~~

~~iii.~~ii. The guaranteed BTA or company-owned project cost recovery period is limited to the PPA term (i.e., 20 years); or

iii. A respondent provides the utility the opportunity, at the respondent's discretion, to purchase the project for a firm amount, which shall be a price that the respondent reasonably believes, based on facts and circumstances at the time the price is determined, will at least be fair market value at exercise, provided that at the time of purchase, the firm amount is equal to or greater than the fair market value and included in the cost comparisons at the time of initial consideration through the procurement process.

~~iv. At the option of the seller, the utility can acquire the PPA asset at the end of the initial PPA term for the fair market value. The utility may request Commission approval for cost recovery in a future contested case.~~

~~v.~~iv. Other options identified in a pre-RFP conference.

i. As applicable, assumptions for tariff risks, state and federal tax credits, or other incentives for all projects.

j. To the extent practical, the terms and conditions for PPA bids should mirror those for BTA contracts or other contract~~ual arrangements~~s resulting from procurements and should not include unequal reserve or other requirements.

k. To the extent that the RFP bidder is constructing a new resource, a commitment by the RFP bidder to comply with the Michigan Labor Standards as directed by Public Act 231 of 2023 and Public Act 10 of 2023. ~~including a commitment to comply with the law and file the final executed labor agreements applicable to the project prior to project construction in the docket approving the project if the project is selected and contracted. This~~This commitment should be identified by the utility in the RFP and included in contract language upon the project contract execution.

l. The RFP will indicate the duration (years) over which the bid's price and non-price factors will be evaluated. Allowable durations for bids for PPAs will include an option to bid a PPA lasting for the full evaluation period (for example, if projects are evaluated over 35 years, bidders could bid a 35-year PPA).

m. The RFP and template PPA will not include terms and conditions which are unreasonable, unusual in the industry, or would unreasonably favor the utility or its affiliate(s).

5. Code of conduct compliance:

   a. All code of conduct rules shall be followed. Utility shall document compliance with the Code of Conduct for any award to an affiliate and shall include such documentation when it files for approval.

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b. RFP clearing price shall be used to determine "market price" in affiliate transactions for resource supply pursuant to MPSC code of conduct rules.

~~c. The utility shall utilize an IA when there are affiliate transactions, or if the utility allows PURPA QF projects to bid into a solicitation, per FERC guidelines.~~

c. The utility is strongly urged to utilize an IA when allowing affiliates to bid.

6. Ensure the competitive bidding process aligns with resource planning and various project/contract approval processes, including requirements in MCL 460.6t(6).

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

STATE OF MICHIGAN)

Case No. U-20852

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on August 27, 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 27th day of August 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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