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MEMORANDUM

DATE: August 9, 2018

TO: Michigan Public Service Commission

FROM: Resource Adequacy and Retail Choice Section

SUBJECT: Capacity Demonstration Technical Conference Staff Report per Case No. U-18441 and U-20154 May 17, 2018 Order

On May 17, 2018, the Commission issued an order in Case No. U-18441 *et al.* directing the Staff to convene a Capacity Demonstration Technical Conference during the Summer of 2018. The May 17 order also directed the Staff to file a report of the results of the technical conference to the docket in Case No. U-20154 within 30 days of the conference.

The Capacity Demonstration Technical Conference Staff Report is attached. As directed by the Commission, the report outlines changes made to the reporting template, as well as updates to the language of the supplier affidavits. Additionally, Staff has included updates made to the Capacity Demonstration Process and Guidelines document and included information regarding zonal resource credit contracts and local clearing requirements.

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CAPACITY DEMONSTRATION TECHNICAL CONFERENCE STAFF REPORT

August 9, 2018

Michigan Public Service Commission Staff

Background

On December 21, 2016, Governor Rick Snyder signed Public Act 341 (PA 341) into law, which amended Public Act 3 of 1939 and became effective on April 20, 2017. The law requires each electric utility, alternative electric supplier (AES), cooperative electric utility, and municipally owned electric utility to demonstrate to the Michigan Public Service Commission (Commission), in a format determined by the Commission, that the 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, or Commission, as applicable.

In the September 15, 2017 order in Case No. U-18197 (September 15 Order), the Commission adopted a format for the state reliability mechanism (SRM) capacity demonstration filings. Case No. U-18441 was opened to accept capacity demonstration filings for planning years 2018/2019 through 2021/2022. Attachment A to the September 15 Order included minimum reporting guidelines and reporting templates from the Commission.

The electric utilities, AESs, cooperative electric utilities, and municipally owned electric utilities submitted their capacity demonstrations in December 2017 and February 2018 as directed by the September 15 Order. The Commission Staff filed a Report and Recommendations addressing the capacity demonstrations in Case No. U-18441 on March 6, 2018, and a Supplemental Report and Recommendations on March 14, 2018 (March 2018 Staff Report). Following feedback from electric providers and a desire to streamline the demonstration process, the Staff issued the following recommendations:

1. The extension of the Staff report deadline by three weeks, until the end of March.
2. The revision of the reporting template for each type of electric provider (incumbent utility, municipality, cooperative, and AES) moving forward.
3. A drafted commitment affidavit and AES load switching affidavit to be included with the updated reporting template to forgo confusion in reporting contents.
4. A Commission directed Capacity Demonstration Technical Conference to take place during the summer of 2018 to gather feedback and suggestions to the capacity demonstration process.

On May 17, 2018 the Commission issued an order (May 17 Order) in Case No. U-18441 *et al.*, which directed the Commission Staff to convene a technical conference in Case No. U-20154 to agree on changes to the reporting template and affidavits for the capacity demonstration with stakeholders. Specifically, the Staff was directed to:

1. Agree on changes to the reporting template for different types of electric providers
2. Agree on the language of both the general affidavit and the AES load switching affidavit
3. Discuss verification of electric provider Zonal Resource Credit (ZRC) contracts

In the May 17 Order, the Commission directed Staff to file a report on the results of the conference in Case No. U-20154 within 30 days of the technical conference. This report describes recommended changes to the Capacity Demonstration Process and Requirements as well as outlining revisions made to the reporting forms and templates incorporating stakeholder feedback. Participants of the July 12, 2018 technical conference are listed in Appendix A. The updated process and template documents are included in this report as Appendix B.

Technical Conference

On July 12, 2018, the Commission Staff held a technical conference at the Commission offices in Lansing, Michigan. The conference introduced each issue presented above, followed by questions and comments from the attending stakeholders. Staff recorded the feedback received from those stakeholders. After the technical conference, Staff revised the reporting template and affidavits according to suggestions received, including revisions to accommodate reporting anticipated load in multiple local resource zones, and appropriately including transmission losses in the calculations. Following the technical conference, Staff distributed the updated forms and documents to the stakeholders for an additional opportunity to provide feedback. Based on both opportunities for stakeholder input, Staff has updated the forms and documents as outlined below.

Reporting Templates

The Commission Staff prepared two reporting template forms in advance of the conference instead of separate reporting template forms for each individual type of LSE. The longer form is very similar to the original reporting template. The shorter form is intended for LSEs which are provided a planning reserve margin requirement (PRMR) from the incumbent utility. The shorter form is essentially the same as the longer form, except that it omits the detailed calculation of the PRMR. Staff explained that utilization of the shorter form would be acceptable as long as evidence of the prompt year PRMR could be provided by the LSE. Both the short form and the long form were presented for feedback at the conference.

Recommended changes to the long form reporting template

The attendees agreed upon the addition of a section to Exhibit 1 which would allow LSEs with load in multiple Zones¹ to clearly break down demand by Zone. In the previous reporting template, this was addressed in the narrative section of the capacity demonstration; however, capturing this information in the reporting forms will make capacity demonstration review simpler as it relates to potential locational requirements.

Descriptions of programs such as demand response (DR), energy waste reduction (EWR), time-of-use rates, and conservation voltage response (CVR) that are netted against the load forecast are to be incorporated into the supporting narrative or the accompanying affidavit. These descriptions correspond to any amount of resources netted against the load forecast that would be shown in Exhibit 2, line 2.

In order to remain consistent with the MISO Business Practice Manual and to avoid confusion and potential double counting of transmission losses, stakeholders agreed that Exhibit 1 should be altered to capture peak demand forecasts excluding transmission losses. The appropriate transmission losses and planning reserve margin are then added to the peak demand on Exhibit 2.

¹ The reporting forms include space to report load by regional transmission operator territories including PJM Interconnection LLC and Midcontinent Independent System Operator (MISO) Local Resource Zones 1,2 and 7.

Recommended changes to the short form reporting template

Similar to the long form discussion, stakeholders agreed to add an exhibit (now Exhibit 1) to the short form where LSEs will clearly show the zonal location of their load. This information will be used for compliance with potential locational requirements.

The addition of a row to capture programs such as DR, EWR, CVR, and time-of-use rates netted against load, similar to the long form reporting template exhibit 2, line 2, was requested by consensus of the attendees. This requested change has been incorporated.

Overall, the short form reporting template was well received by the attendees. The short form template will be included in the U-20154 capacity demonstrations for planning year 2022/2023.

Affidavit Templates

The Commission Staff prepared two affidavit templates in response to the recommendations in the March 2018 Staff Report. The general affidavit template was composed to include each type of resource that may be demonstrated. An AES load switching affidavit was prepared by Staff to provide an example of acceptable formatting and was compiled from previous AES load switching affidavit language.

Recommended changes to the general affidavit

Recommended changes to the general affidavit suggested by participants during the conference are summarized below:

- The opening statement attesting to the content of the affidavit should be more detailed, similar to the language in the AES load switching affidavit.
- Line 9 and 10 should be rephrased to imply that all submissions to the Staff remain confidential.
- Line 11 should be rephrased to clarify that AESs do not need to provide information beyond that which is required for the capacity demonstration.
- A line should be added to allow exclusion of contracts previously approved by the Commission.
- A line should be added to allow the inclusion of a description of load-modifying programs, such as DR, EWR, or CVR.

All but one of the summarized changes have been incorporated into the general affidavit. While Staff does not plan to audit contracts previously approved by the Commission, Staff does not wish to forgo the opportunity to do so, should it be deemed necessary.

Recommended changes to the AES load switching affidavit

Some of the conference participants suggested edits and points of clarification to the AES load switching affidavit and indicated that no AES should be dependent on another to file an additional affidavit. Specifically, the Staff reiterated that our proposed process will not require two affidavits and clarified that the AES gaining load will complete the affidavit and provide a copy of it to the AES losing load to also submit with its demonstration.

The feedback received by conference participants has been incorporated into the attached AES load switching affidavit.

ZRC Contract Audits

In the May 17 Order, the Commission notes that the Staff recommends that, with respect to the future review of contracts, LSEs should rely only on ZRC contracts that can be audited by the Staff and discontinue reliance on contracts that specify that the ZRCs will be offered into the applicable MISO auction and thus do not allow for auditing of the delivery of the ZRCs prior to the auction. The Commission further directed the Staff to include this issue among the issues to be discussed at the technical conference. The verification of delivered ZRCs was discussed with stakeholders at the technical conference, particularly the ability to verify the source of the generation that generates the ZRC. At this time, no stakeholder has offered a method to link a particular planning resource offered into the MISO Planning Resource Auction (PRA) to any particular ZRC purchased through the PRA. Therefore, Staff continues to recommend that any contracts that specify delivery of ZRCs into the PRA be treated as contributing to an LSE's allowed amount of PRA purchases as opposed to being considered contracted resources. A revision has been made to the Capacity Demonstration Process and Requirements to reflect this clarification.

Additional Stakeholder Feedback

Following the technical conference, Staff agreed to re-circulate the templates which would incorporate the changes discussed on July 12. Staff has since received additional written feedback from stakeholders regarding further potential revisions to the reporting and affidavit templates.

Based upon written feedback, Staff has incorporated the following additional changes to the reporting templates:

- A request was made to clarify whether an LSE is required to provide a response on a tab within the template if the information within that tab does not apply to the LSE specifically. Staff has provided more substantial notes within the cover page of each form to provide additional filing instructions and clarity for all LSEs.
- Feedback was received on making the forms more user friendly by incorporating more excel formulas to do some of the calculations and carrying of values from one exhibit to another where appropriate. Staff attempted to add these formulas to the spreadsheet and added a line of instruction requesting that LSEs point out any deviation from these formulas in their demonstration narrative.
- A question was received about how an LSE should account for contracted sales. Staff recommends LSEs record contracted sales on the contracted resources exhibit (Exhibit 5) using negative numbers for the ZRCs. Formulas were adjusted to account for this and a line of instruction was added to the cover page.

Based upon written feedback, Staff has incorporated additional changes to the draft AES load switching affidavit template clarifying that the load being accounted for within the affidavit is based on peak load contribution values and adding a clause explaining that the affidavit has been requested at the behest of the Commission Staff.

Additional written feedback that was received for the AES load switching affidavit, but not implemented, supported the process whereby both the “gaining” and “losing” AES were responsible for providing an affidavit for any load switching. Because the discussion at the technical conference was supportive of allowing one affidavit outlining the load switch to be included in the gaining supplier’s demonstration with a copy provided to the losing supplier to include in its demonstration, and no other similar comments were received requesting two affidavits, Staff does not recommend implementing this as a requirement at this time.

Local Clearing Requirement (LCR)

On June 28, 2018 the Commission issued an Order in Case No. U-18444 implementing an LCR applicable to Michigan LSEs serving customer load in MISO local resource zone 7.

On July 12, 2018, the Michigan Court of Appeals ruled that the statute does not provide the Commission the authority to impose a local clearing requirement on individual electric suppliers. The court reversed and remanded the Commission’s September 15, 2017 Order in Case No. U-18197. At the time this report was written, the Commission has not taken further action to accept or challenge the court ruling. In addition, a request for reconsideration as well as appeals to the Michigan Court of Appeals have been filed regarding the Commission’s June 28, 2018 Order in Case No. U-18444. Until the Commission takes further action in those cases, Staff continues to implement the previously approved Commission Orders.

The attached Capacity Demonstration Process and Requirements document and reporting templates include provisions as directed in the June 28, 2017 Commission Order. Staff recommends the use of these reporting templates and affidavits for the 2022/2023 planning year capacity demonstrations and will upload the documents for Michigan LSEs to use if applicable. The reporting templates and affidavits may be updated at some point in the future as directed by the Commission.

Appendix A

Stakeholder Participant List

Capacity Demonstration Technical Conference Stakeholder Participant List

1. Calpine Energy Solutions
2. Cloverland Electric Cooperative
3. Constellation
4. Consumers Energy Company
5. Direct Energy
6. DTE Electric Company
7. Energy Michigan
8. First Energy Solutions
9. 5 Lakes Energy
10. ITC Holding Corp.
11. Lansing Board of Water and Light
12. Legacy Energy
13. Michigan Chamber of Commerce
14. Michigan Electric and Gas Association
15. Michigan Energy Innovation Business Council
16. Michigan Public Power Agency
17. Michigan Public Service Commission Staff
18. Midcontinent Independent System Operator (MISO)
19. Upper Peninsula Power Company
20. Walmart
21. WEC Energy Group
22. Wolverine Power Supply Cooperative Inc.

Appendix B

Updated Process Documents and Templates

CAPACITY DEMONSTRATION PROCESS AND REQUIREMENTS FOR PLANNING YEARS 2022/23 AND 2023/24

Capacity Demonstration Process

Commission issued final order on Michigan Forward Locational Requirements for 2022/23 & 2023/24 (Case No. U-18444)	Commission issues orders in cases to assign AES capacity obligations to utilities and impose SRM charges from U-18441 demonstrations; Commission also opens docket (U-20154) for 2022/23 demonstration	Commission Staff issues memo in 2022/23 capacity demonstration docket with updated capacity obligations based upon latest MISO LOLE report	Utilities file capacity demonstrations in same docket	AESs, Cooperatives, Municipalities file capacity demonstrations in same docket	Commission Staff issues memo regarding sufficiency of capacity demonstrations in docket
June 28, 2018#	September 1, 2018*	November 1, 2018*	December 3, 2018*	February 11, 2019*	March 28, 2019*
Commission Order on capacity demonstration, possibly opening new contested case(s) to impose SRM charges	Commission issues orders in cases to assign AES capacity obligations to utilities and impose SRM charges from 2022/23 demonstrations; Commission also opens docket for 2023/24 demonstration	Commission opens docket for contested case to set the Michigan Forward Locational Requirements for 2024/25 & 2025/26	Commission Staff issues memo in 2023/24 capacity demonstration docket with updated capacity obligations based upon latest MISO LOLE report	Utilities file capacity demonstrations in same docket	AESs, Cooperatives, Municipalities file capacity demonstrations in same docket
April, 2019*	September 1, 2019*	October, 2019#	November 1, 2019*	December 1, 2019*	February 11, 2020*
Commission Staff issues memo regarding sufficiency of capacity demonstrations in docket	Commission Order on capacity demonstration, possibly opening new contested case(s) to impose SRM charges	Commission issues final order on Michigan Forward Locational Requirements for 2024/25 & 2025/26			
March, 2020*	April, 2020*	July, 2020#			

*Capacity demonstration process (repeats annually)
 #Determine incremental capacity need (repeats every two years)

Michigan Public Service Commission (MPSC or Commission) Case No. U-20154 has been opened for the planning year 2022/23 capacity demonstrations. A separate docket will be opened in the fall of 2019 for the planning year 2023/24 capacity demonstrations. The Commission orders opening the dockets will provide requirements for load serving entities (LSE) to follow in making capacity demonstrations and include the capacity obligations to be applicable for the demonstration year.

The capacity demonstration obligations will be determined in a consistent and transparent manner, based upon the most recently published Loss of Load Expectation (LOLE) study by the Midcontinent Independent System Operator (MISO).

The capacity demonstrations filed in this docket shall include four years of load obligations and owned or contracted resources, similar to the requests that the Commission has made in previous years. The capacity demonstration for year four will be used to determine if the LSE has met its capacity obligations, while the data filed for years one through three will be used for informational purposes only. Each LSE's applicable capacity obligation will be based upon its most recent Planning Reserve Margin Requirement (PRMR), as specified by MISO, and adopted by the Commission.

For the purposes of the capacity demonstrations for the Michigan State Reliability Mechanism (SRM), MCL 460.6w(8), the total capacity obligation to meet for a given LSE shall be the LSEs' PRMR. The PRMR includes a LSE's MISO Coincident Peak Demand adjusted for internal demand response programs netted against load, plus transmission losses and planning reserve margin (PRM) UCAP (unforced capacity) percentage. For LSEs provided a peak load contribution (PLC) value from their Energy Distribution Company (EDC), their capacity obligation to meet shall be their PLC, if it already includes transmission losses, and PRM UCAP percent adjustments.

The applicable MISO PRM UCAP percentages reported in the [MISO 2018-2019 Loss of Load Expectation Study Report](#) are as follows:

Planning Year	2022/23	2023/24
PRM UCAP	8.4%	8.4%

The PRM UCAP percentages will be updated annually, or as released by MISO in future LOLE Studies. The PRM UCAP percentages applicable for each demonstration year will be included in the order that opens the capacity demonstration docket and will be updated by MPSC Staff memo to the docket if applicable PRMR updates are published by MISO subsequent to the Commission Order.

The PLC determination for Retail Open Access (ROA) customers should be made through a cooperative process which is consistent with current MISO rules for dispute resolution. These PLC determinations will ultimately drive the total amount of capacity obligation that an Alternative Electric Supplier (AES) will be required to meet in its annual demonstration before the Commission.

Forward Locational Requirement Methodology

The process used to determine the forward locational requirements is as follows:

1. Use the methodology from Staff's August 1, 2017 report and MISO's comments in Case No. U-18197 to project the Local Resource Zone's (LRZ) Locational Clearing Requirement (LCR) six years forward using the data provided in the 2018-2019 MISO LOLE Study Report.¹
 - a. Extrapolate/Interpolate the Peak Demand and Local Reliability Requirement (LRR) UCAP per-unit of LRZ Peak Demand to find values for the needed year (not necessary in this iteration because 2023/24 values were included in the MISO LOLE Study Report).
 - b. Determine the LRZ's LRR by multiplying the zone's peak demand by the LRR UCAP per-unit of LRZ Peak Demand percentage.

¹ <https://www.misoenergy.org/api/documents/getbymediaid/80578>.

- c. Calculate the forward LCR by subtracting the Capacity Import Limit (held constant from the prompt year) from the LRR.
2. Analyze previously filed confidential and public LSE resource data to project any changes to the amount of existing resources in the zone six years forward.
3. Subtract the projected existing resources in the zone from the zone’s LCR to determine the forward locational incremental need.
4. Divided the forward locational incremental need by the zone’s Peak Demand. This percent is the forward locational requirement for each LSE for the two year period.
5. Split this percentage evenly to determine the annual percentage applicable to each of the two planning years; 2022/23 and 2023/24.
6. The forward locational requirement applicable to each LSE is the annual percentage multiplied by its respective prompt year peak demand applicable for the demonstration.

Zonal Locational Requirements for Planning Years 2022/23 and 2023/24:²

MISO Zone 2					
Planning Year	Peak Demand (MW) {A}	LRR UCAP per-unit of LRZ Peak Demand {B}	LRR (MW) {C}={A}*{B}	Capacity Import Limit (MW) {D}	LCR (MW) {E}={C}-{D}
2023/24	13,054	118.7%	15,495	2,317	13,178

MISO Zone 7					
Planning Year	Peak Demand (MW) {A}	LRR UCAP per-unit of LRZ Peak Demand {B}	LRR (MW) {C}={A}*{B}	Capacity Import Limit (MW) {D}	LCR (MW) {E}={C}-{D}
2023/24	21,384	115.3%	24,656	3,785	20,871

The zonal locational requirements for future planning years 2024/25 and beyond will be addressed in a future filing as determined by the Commission.

Zone 7 Incremental Need and Forward Locational Requirement

The total projected resources in Zone 7 in 2023/24 is based on the capacity demonstration filings in Case No. U-18197 which covered planning years 2017/18 through 2021/22. Adjustments were made to remove behind the meter generation (btmg) not in the MISO Resource Adequacy Construct, reported retirements, zonal resource credit (ZRC) purchases, resources located outside of the zone, and any double counted units. The resulting total projected resources in Zone 7 for 2023/24 is 19,734 MW or 1,137 MW less than the projected MISO LCR in 2023/24³. This forward incremental need represents

² The source for the data in columns {A} through {E} is the MISO 2018 – 2019 LOLE Study Report, <https://www.misoenergy.org/api/documents/getbymediaid/80578>.

³ The total projected resources has been updated to include the publicly announced retirements of Karn 1 & 2 as directed by the Commission in its June 28, 2018 order in Case No. U-18444, <https://mi-psc.force.com/sfc/servlet.shepherd/version/download/068t00000023GMHAA2>.

5.3% of the projected Zone 7 peak demand. Splitting this need evenly between the 2022/23 and 2023/24 planning years results in a forward locational requirement for each LSE in Zone 7 of 2.7% of its prompt year PLC to be met with Zone 7 resources in 2022/23, and 5.3% in 2023/24. The percentage requirements were rounded to the nearest tenth of a percent.

Planning Year	Applicable PLC	Forward Locational Requirement
2022/23	Determined January, 2019	2.7%
2023/24	Determined January, 2020	5.3%

The forward locational requirements for Zone 7 for planning years 2024/25 and beyond will be re-evaluated going forward based upon future directives set by Commission Order.

Zone 2 Forward Locational Requirement

Unlike Zone 7, which is entirely located in the Lower Peninsula of Michigan, Zone 2 includes the Upper Peninsula of Michigan and a large portion of eastern Wisconsin. The MPSC does not have the same level of detail regarding the generation sited in Wisconsin as it does for generation sited in Michigan. Without making any assumptions regarding the future retirement of Zone 2 resources, the 2017-2018 MISO Planning Resource Auction Results show the Total Offers Submitted in Zone 2 of 15,149 ZRCs, which exceeds the projected Zone 2 LCR (13,178 MW) in 2023/24 by 15%. Utilizing the same method as applied to Zone 7 results in an incremental need of zero for Zone 2. Based upon the current surplus of existing resources in Zone 2, the forward locational requirement for LSEs in Zone 2 is zero for planning years 2022/23 and 2023/24. Although the current forward locational requirement is zero for LSEs in Zone 2, the adequacy of resources in Zone 2 will continue to be monitored. The PRMR capacity obligations still apply to LSEs in Zone 2 on a four-year forward basis as required by MCL 460.6w. The forward locational requirements for Zone 2 are not subject to biennial reevaluation unless the Commission directs otherwise in a future order.

Zone 1 Forward Locational Requirement

The individual forward locational requirement for LRZ 1 is zero and is not subject to biennial reevaluation unless the Commission directs otherwise in a future order. The PRMR capacity obligations still apply to LSEs in Zone 1 on a four-year forward basis as required by MCL 460.6w.

Resource Demonstrations

The minimum acceptable support for all resources submitted as part of a capacity demonstration include:

- 1) Documentation supporting the MISO zonal location of the resource, and;
- 2) The minimum acceptable support based upon the type of resource that is outlined in the sections below.

Existing generation (owned)

The minimum acceptable support for existing generation that is included in a capacity demonstration include:

- 1) An affidavit from an officer of the company claiming ownership of the unit(s), including a commitment of the unit(s) to LSE load in the applicable Michigan zone four years forward,
- 2) A copy of the existing ZRC qualification of the unit(s) from the MISO Module E Capacity Tracking Tool, and;
- 3) If there are retail tariffs or customer contracts associated with the resources, copies should be provided.

Existing demand response or energy efficiency resources (that have not been netted against load)

The minimum acceptable support for existing demand response resources or energy efficiency resources that have not already been netted against load include:

- 1) An affidavit from an officer of the company outlining the resource(s), including a commitment to maintain at least that same level of resources four years forward,
- 2) A copy of the existing ZRC qualification of the resource(s) from the MISO Module E Capacity Tracking Tool, and;
- 3) If there are retail tariffs or customer contracts associated with the resources, copies should be provided.

New or upgraded generation (owned)

The minimum acceptable support for proposed new generation include:

- 1) An affidavit from an officer of the company outlining the detailed plans for the new generation including milestones such as planned in-service date, expected regulatory approval date(s), planned date to enter the MISO generator interconnection queue, expected date for MISO generator interconnection agreement, construction timeline, etc.,
- 2) Documentation supporting the expected ZRC qualification from MISO for the new unit(s), and;
- 3) If there are retail tariffs or customer contracts associated with the resources, copies should be provided.

For new generation submitted as part of a capacity demonstration, the Commission finds that all of the above data be updated and submitted on an annual basis with each subsequent capacity demonstration until the unit(s) are in service.

New demand response or energy efficiency resources (that have not been netted against load)

The minimum acceptable support for new demand response resources or energy efficiency resources that have not already been netted against load included in a capacity demonstration include:

- 1) An affidavit from an officer of the company outlining the plans for the resource(s), including a commitment to achieve and/or maintain at least that same level of resources four years forward,
- 2) Evidence that the customer's distribution utility has been notified of specific customers participating in the resource,
- 3) Specific plans to have the resource(s) qualified by the independent system operator, and;
- 4) If there are retail tariffs or customer contracts associated with the resources, copies should be provided.

For new demand response or energy efficiency resources submitted as part of a capacity demonstration, the Commission finds that all of the above data be updated and submitted on an annual basis with each subsequent capacity demonstration until the resource(s) are in service. Final qualification / approval from the independent system operator should be submitted in a subsequent demonstration.

Existing generation (capacity contract)

The minimum acceptable support for capacity contracts with existing generation include:

- 1) An affidavit from an officer of the company including a copy of the contract that specifies the unit(s) or pool of generation that is the source of the contract, including the location of the unit(s) or pool. The affidavit should include a commitment to maintain the contracted amount four years forward regardless of any early out clauses in the contract, and;
- 2) A copy of the existing ZRC qualification of the unit(s) or pool from the MISO Module E Capacity Tracking Tool that the LSE obtains from the asset owner and includes with the demonstration filing.

Forward ZRC contracts

The minimum acceptable support for forward ZRC contracts include an affidavit from an officer of the company including a copy of the contract that specifies the zonal location of the ZRCs. The affidavit should include a commitment to maintain the contracted amount four years forward regardless of any early-out clauses in the contract. A forward ZRC contract that does not specify the zonal location of the ZRCs will be deemed insufficient towards meeting any portion of a locational requirement, unless the LSE provides other alternative support for the location of the ZRCs.

Resources submitted in an LSE capacity demonstration to meet forward locational requirements must be located within the same LRZ as the LSE. Evidence demonstrating that a resource located outside of the LSE's zone would count towards meeting the LCR of the LSE's zone should be provided by the demonstrating LSE if applicable. Existing contracts with resources outside of an LSE's zone will count towards meeting forward locational requirements if they are for a period of at least twenty years and the contracts were entered into prior to MISO's implementation of local resource zones on June 1, 2013.

PRA Purchases

The amount of ZRCs planned to be purchased in the MISO Planning Resource Auction (PRA) that will be deemed prudent in an approved capacity demonstration will be limited to the following percentage of the LSE’s total PRMR requirement.

Planning Year	2022/23	2023/24
PRA Purchases (%)	5%	5%

Utilization of the MISO PRA in interim years

A capacity demonstration filed by an LSE that includes a plan to purchase ZRCs in the PRA four years in the future in excess of the allowable amounts outlined above, will not constitute a demonstration that the LSE owns or has contracted resources to meet its future capacity obligations, unless those ZRCs are tied to specific identified resources that are committed to be offered in the PRA, by contract, on behalf of the LSE for the applicable planning year.

Once the Commission has determined that the capacity demonstration made by an LSE is deemed to be sufficient, it shall not be re-litigated or “trued-up” in the interim years. If, subsequent to its initial satisfactory capacity demonstration, an LSE experiences an unforeseen significant outage at one of its generation assets, or has an unforeseen variation in its total load obligations, these matters will be settled in the PRA. The LSE’s initial capacity demonstration will not be re-examined to reconcile projected interim year load obligations or generating resource capacity ratings with actual values that are experienced in that interim year.

Additional Considerations for Capacity Demonstrations

Other types of documentation submitted as part of a capacity demonstration will be evaluated on a case by case basis. Because some of the documentation that is required to be filed in these proceedings is commercially sensitive, competitive information, it shall continue to be treated in a confidential manner, as has been done in the past. The Staff shall file a memo in the docket by March 28, 2019, outlining its findings from the demonstration filings, including a listing of any entities whose demonstration, in Staff’s opinion, did not completely pass muster.

In the case where a demonstration filing does not pass Staff’s muster, Staff would recommend that the Commission open a contested case docket, whereby the LSE in question could attempt to prove that its capacity demonstration should be deemed acceptable. The outcome of that case would be a Commission order potentially authorizing SRM capacity charges to ROA customer load as well as a respective increase in capacity obligations assigned to the incumbent utility as the Provider of Last Resort for capacity service. Any contested demonstration cases will be opened as soon as practicable following the issuance of the Staff memo and be completed within six months.

If an LSE has met the capacity demonstration requirements, no contested case will be opened, and no further action will be taken regarding any capacity demonstration that has been deemed sufficient by Staff and accepted by the Commission.

Capacity Demonstrations for LSEs in PJM service territory

PJM Interconnection LLC (PJM) has a mandatory forward capacity market for LSEs in its service territory. LSEs in the PJM service territory meet their Independent System Operator capacity obligations either through participation in PJM's Reliability Pricing Model (RPM) Base Residual Auction (BRA) or through PJM's Fixed Resource Requirement (FRR) capacity plan. The PJM capacity market is a three year forward market with the calendar aligned slightly differently than what exists with the MISO capacity market. PJM's tariff requires FRR entities (those that self-supply capacity as Indiana Michigan Power has done since the inception of the RPM construct in 2007) to prove capacity for the 2022/23 delivery year (June 2022 through May 2023) in April 2019. The BRA will be completed in May 2019 for the 2022/23 delivery year, and in May 2020 for the 2023/24 delivery year.

The timing of PJM LSEs capacity demonstrations to the Commission will remain the same as those expected of MISO LSEs, however, PJM LSEs will be allowed to file an amended capacity demonstration two weeks after the completion of the PJM RPM BRA if the LSE participates in the BRA. The capacity demonstration should include the FRR capacity plan and/or BRA results. Meeting PJM's capacity obligations, including any applicable Percentage Internal Resources Required for the delivery year will constitute a satisfactory demonstration, and the demonstrating LSE should provide evidence that it has met PJM's capacity obligations.

Demonstration Format

In addition to all of the items outlined above, the following forms shall also be utilized by the LSE in filing its demonstration.



Pursuant to the Order in Commission Case No.

U-20154

Entities are directed to use this form to submit a capacity demonstration of their ability to meet their customers' expected electric requirements for the 2022 planning year.

Long Form

As directed by the Commission in the May 17, 2018 Order in Case No. U-20154, electric utilities required to file capacity demonstrations for the 2022 planning year shall make that filing by December 3, 2018 and other load serving entities required to file capacity demonstrations for the 2022 planning year shall make that filing by February 11, 2019. In accordance with the Commission Order in Case No. U-20154, load serving entities shall use the attached exhibits when filing their capacity demonstrations. In order to simplify the process MPSC Staff has created two versions of these forms. The short version may be used by load serving entities that are provided a Planning Reserve Margin Requirement (including transmission losses and planning reserve margin) from their Energy Distribution Company. All other load serving entities should use the long version. Companies are encouraged to submit a written narrative, which will support the data provided in these tables. Submittal of these forms does not necessarily ensure complete compliance with the requirements outlined in the Order; each company should be certain that their filing meets the full extent of the Order.

Notes

1. In addition to those requirements outlined by the Order, all filings should include:
 - a. Discussion of any observed risks associated with mid-planning year retirement of generation assets.
 - b. Discussion of the plan to meet any identified capacity shortfall.
 - c. Discussion supporting the data provided in the attached tables.
2. Definitions of key line items are included as comments on the individual cell.
3. Companies are only required to file exhibits that contain substantive information.
4. Please report all data in the units specified by the corresponding row/column.
5. Exhibits provide sample calculations, including formulae, used to derive the final result. Exhibits also include excel formulas which will do some calculations automatically as well as move values from exhibit to exhibit where appropriate.
 - a. Any deviation from the intended formulae should be noted and justified in the narrative of the filing.
6. Exhibit 2 (Summary) has formulas that will automatically populate the resources section of the table from data entered in Exhibits 3, 4, & 5.
7. Contracted sales can be shown in Ex. 5 using negative values for ZRCs.

Utility Bundled Service Peak Demand for Michigan MISO LRZ 7									
Actual and Forecast (MW) - Excluding Transmission Losses									
Line	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
	Sample Calc.	PY 2016-17	PY 2017-18	PY 2018-19	PY 2019-20	PY 2020-21	PY 2021-22	PY 2022-23	
		Actual	Actual	Actual	Forecast	Forecast	Forecast	Forecast	Forecast
Peak Demand (MW)									
1	Service Territory	12,345							
2	Choice, Coincident to Service Territory	1,234							
3	Bundled (line 1 - line 2)	11,111	0	0	0	0	0	0	0
Coincident to MISO Sys. Peak Demand (MW)									
4	Service Territory	12,098							
5	Choice, Coincident to Service Territory	1,209							
6	Bundled (line 4 - line 5)	10,889	0	0	0	0	0	0	0

Utility Bundled Service Peak Demand for Michigan MISO LRZ 2									
Actual and Forecast (MW) - Excluding Transmission Losses									
Line	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
	Sample Calc.	PY 2016-17	PY 2017-18	PY 2018-19	PY 2019-20	PY 2020-21	PY 2021-22	PY 2022-23	
		Actual	Actual	Actual	Forecast	Forecast	Forecast	Forecast	Forecast
Peak Demand (MW)									
1	Service Territory	12,345							
2	Choice, Coincident to Service Territory	1,234							
3	Bundled (line 1 - line 2)	11,111	0	0	0	0	0	0	0
Coincident to MISO Sys. Peak Demand (MW)									
4	Service Territory	12,098							
5	Choice, Coincident to Service Territory	1,209							
6	Bundled (line 4 - line 5)	10,889	0	0	0	0	0	0	0

Utility Bundled Service Peak Demand for Michigan MISO LRZ 1

Actual and Forecast (MW) - Excluding Transmission Losses

Line	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
		Sample Calc.	PY 2016-17	PY 2017-18	PY 2018-19	PY 2019-20	PY 2020-21	PY 2021-22	PY 2022-23
			Actual	Actual	Actual	Forecast	Forecast	Forecast	Forecast
Peak Demand (MW)									
1	Service Territory	12,345							
2	Choice, Coincident to Service Territory	1,234							
3	Bundled (line 1 - line 2)	11,111	0	0	0	0	0	0	0
Coincident to MISO Sys. Peak Demand (MW)									
4	Service Territory	12,098							
5	Choice, Coincident to Service Territory	1,209							
6	Bundled (line 4 - line 5)	10,889	0	0	0	0	0	0	0

Utility Bundled Service Peak Demand for Michigan PJM

Actual and Forecast (MW) - Excluding Transmission Losses

Line	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
		Sample Calc.	PY 2016-17	PY 2017-18	PY 2018-19	PY 2019-20	PY 2020-21	PY 2021-22	PY 2022-23
			Actual	Actual	Actual	Forecast	Forecast	Forecast	Forecast
Peak Demand (MW)									
1	Service Territory	12,345							
2	Choice, Coincident to Service Territory	1,234							
3	Bundled (line 1 - line 2)	11,111	0	0	0	0	0	0	0
Coincident to PJM Sys. Peak Demand (MW)									
4	Service Territory	12,098							
5	Choice, Coincident to Service Territory	1,209							
6	Bundled (line 4 - line 5)	10,889	0	0	0	0	0	0	0

* Totals carry to Exhibit 2.

* Provide actual values where available.

* Assume current proportions of Bundled service and Choice service throughout the forecast period unless there is a known change in electric service provider.

* Do not adjust for Load Modifying Resources or Demand Response Programs. Those adjustments will be accounted for in Exhibit 2.

Planning Reserve Margin Requirements and Planning Resources to be Acquired (ZRC)

Line	(a)	(b)	(c)	(d)	(e)
	Sample Calc.	PY 2019-2020	PY 2020-2021	PY 2021-2022	PY 2022-2023
1	Forecasted Bundled (or AES) Non-Coincident Peak Demand, MW (from Ex. 1)	11,111	-	-	-
2	Internal Demand Response Programs that are applied as an adjustment to the Peak forecast, MW	11	-	-	-
3	Adjusted Forecasted Bundled (or AES) Non-Coincident Peak Demand, MW (line 1 - line 2)	11,100	-	-	-
4	Load Diversity Factor coincident to MISO, %	98.00%	-	-	-
5	Adjusted Forecasted Bundled (or AES) Coincident Peak Demand, MW (line 3 x line 4)	10,878	-	-	-
6	Transmission Losses, %	2.80%	-	-	-
7	Planning Reserve Margin % UCAP Basis	7.10%	8.40%	8.30%	8.30%
8	Total Planning Reserve Margin Requirement, ZRC ((line 5) x (1 + line 6) x (1 + line 7))	11,977	-	-	-
9	Company Owned, In-State, Non-Intermittent, ZRC	8,890	-	-	-
10	Company Owned, Out-of-State, Non-Intermittent, ZRC	120	-	-	-
11	Company Owned, In-State, Non-Intermittent (BTMG), ZRC	660	-	-	-
12	Company Owned, Out-of-State, Non-Intermittent (BTMG), ZRC	100	-	-	-
13	Company Owned, In-State, Intermittent, ZRC	20	-	-	-
14	Company Owned, Out-of-State, Intermittent, ZRC	40	-	-	-
15	Company Owned, In-State, Intermittent (BTMG), ZRC	60	-	-	-
16	Company Owned, Out-of-State, Intermittent (BTMG), ZRC	80	-	-	-
17	Total Company Owned Generation, ZRC (sum of lines 9-16)	9,970	-	-	-
18	Total Load Modifying Resources, Treated as Capacity, ZRC (from Ex. 4)	-	-	-	-
19	PPA, In-State, Non-Intermittent, ZRC	100	-	-	-
20	PPA, Out-of-State, Non-Intermittent, ZRC	200	-	-	-
21	PPA, In-State, Non-Intermittent (BTMG), ZRC	26	-	-	-
22	PPA, Out-of-State, Non-Intermittent (BTMG), ZRC	6	-	-	-
23	PPA, In-State, Intermittent, ZRC	20	-	-	-
24	PPA, Out-of-State, Intermittent, ZRC	40	-	-	-
25	PPA, In-State, Intermittent (BTMG), ZRC	60	-	-	-
26	PPA, Out-of-State, Intermittent (BTMG), ZRC	80	-	-	-
27	Other Forward Capacity Contract, ZRC - In-State	220	-	-	-
28	Other Forward Capacity Contract, ZRC - Out-of-State	-	-	-	-
29	Total PPA, ZRC (sum of lines 19-28)	752	-	-	-
30	Total Planning Resources, ZRC (line 17 + line 18 + line 29)	10,722	-	-	-
31	UCAP Surplus/(Shortfall), MW (line 30 - line 8)	(1,255)	-	-	-

Demand Response - Capacity Resources

(a)	(b)	(c)	(d)	(e)
	Demand Response Program Name	Demand Response Program (MW)	Credit Transmission Losses and PRM _{UCAP}	Total ZRC per Program Name
PY 2019-UCAP				-
				-
				-
				-
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				-
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Pursuant to the Order in Commission Case No.

U-20154

Entities are directed to use this form to submit a capacity demonstration of their ability to meet their customers' expected electric requirements for the 2022 planning year.

Short Form

As directed by the Commission in the May 17, 2018 Order in Case No. U-20154, electric utilities required to file capacity demonstrations for the 2022 planning year shall make that filing by December 3, 2018 and other load serving entities required to file capacity demonstrations for the 2022 planning year shall make that filing by February 11, 2019. In accordance with the Commission Order in Case No. U-20154, load serving entities shall use the attached exhibits when filing their capacity demonstrations. In order to simplify the process MPSC Staff has created two versions of these forms. The short version may be used by load serving entities that are provided a Planning Reserve Margin Requirement (including transmission losses and planning reserve margin) from their Energy Distribution Company. All other load serving entities should use the long version. Companies are encouraged to submit a written narrative, which will support the data provided in these tables. Submittal of these forms does not necessarily ensure complete compliance with the requirements outlined in the Order; each company should be certain that their filing meets the full extent of the Order.

Notes

1. In addition to those requirements outlined by the Order, all filings should include:
 - a. Discussion of any observed risks associated with mid-planning year retirement of generation assets.
 - b. Discussion of the plan to meet any identified capacity shortfall.
 - c. Discussion supporting the data provided in the attached tables.
2. Definitions of key line items are included as comments on the individual cell.
3. Companies are only required to file exhibits that contain substantive information.
4. Please report all data in the units specified by the corresponding row/column.
5. Exhibits provide sample calculations, including formulae, used to derive the final result. Exhibits also include excel formulas which will do some calculations automatically as well as move values from exhibit to exhibit where appropriate.
 - a. Any deviation from the intended formulae should be noted and justified in the narrative of the filing.
6. Exhibit 2 (Summary) has formulas that will automatically populate the resources section of the table from data entered in Exhibits 3, 4, & 5.
7. Contracted sales can be shown in Ex. 5 using negative values for ZRCs.

Total Planning Reserve Margin Requirement (PRMR) for Michigan by Zone
Actual and Forecast (MW)

Line	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
		Sample Calc.	PY 2016-17	PY 2017-18	PY 2018-19	PY 2019-20	PY 2020-21	PY 2021-22	PY 2022-23
Zone			Actual	Actual	Actual	Forecast	Forecast	Forecast	Forecast
1	MISO LRZ 1	0							
2	MISO LRZ 2	100							
3	MISO LRZ 7	50							
4	PJM	0							
5	Total	150	0	0	0	0	0	0	0

* Totals carry to Exhibit 2.

* PRMR is synonymous with Peak Load Contribution (PLC) and should include transmission losses and planning reserve margin percentage.

* Provide actual values where available.

* Do not adjust for Load Modifying Resources or Demand Response Programs. Those adjustments will be accounted for in Exhibit 2.

Planning Reserve Margin Requirements and Planning Resources (ZRC)

Line	(a)	(b)	(c)	(d)	(e)
	Sample Calc.	PY 2019-2020	PY 2020-2021	PY 2021-2022	PY 2022-2023
1	Total Planning Reserve Margin Requirement, UCAP MW	150	0	0	0
2	Company Owned, In-State, Non-Intermittent, ZRC	80	-	-	-
3	Company Owned, Out-of-State, Non-Intermittent, ZRC	-	-	-	-
4	Company Owned, In-State, Non-Intermittent (BTMG), ZRC	-	-	-	-
5	Company Owned, Out-of-State, Non-Intermittent (BTMG), ZRC	-	-	-	-
6	Company Owned, In-State, Intermittent, ZRC	-	-	-	-
7	Company Owned, Out-of-State, Intermittent, ZRC	-	-	-	-
8	Company Owned, In-State, Intermittent (BTMG), ZRC	-	-	-	-
9	Company Owned, Out-of-State, Intermittent (BTMG), ZRC	-	-	-	-
10	Total Company Owned Generation, ZRC (sum of lines 2-9) (from Ex. 4)	80	-	-	-
11	Total Load Modifying Resources, Treated as Capacity, ZRC (from Ex. 3)	10	-	-	-
12	PPA, In-State, Non-Intermittent, ZRC	-	-	-	-
13	PPA, Out-of-State, Non-Intermittent, ZRC	-	-	-	-
14	PPA, In-State, Non-Intermittent (BTMG), ZRC	-	-	-	-
15	PPA, Out-of-State, Non-Intermittent (BTMG), ZRC	-	-	-	-
16	PPA, In-State, Intermittent, ZRC	-	-	-	-
17	PPA, Out-of-State, Intermittent, ZRC	-	-	-	-
18	PPA, In-State, Intermittent (BTMG), ZRC	-	-	-	-
19	PPA, Out-of-State, Intermittent (BTMG), ZRC	-	-	-	-
20	Other Forward Capacity Contract, ZRC - In-State	15	-	-	-
21	Other Forward Capacity Contract, ZRC - Out-of-State	50	-	-	-
22	Total PPA, ZRC (sum of lines 12-21) (from Ex. 5)	65	-	-	-
23	Total Planning Resources, ZRC (line 10 + line 11 + line 22)	155	-	-	-
24	UCAP Surplus/(Shortfall), MW (line 23 - line 1)	5	0	0	0

Demand Response - Capacity Resources

(a)	(b)	(c)	(d)	(e)
	Demand Response Program Name	Demand Response Program (MW)	Credit Transmission Losses and PRM _{UCAP}	Total ZRC per Program Name
PY 2019-UCAP				-
				-
				-
				-
				-
				-
				-
Total Demand Response - Capacity Resources PY 2019-2020 (ZRC)				-
PY 2020-UCAP				-
				-
				-
				-
				-
				-
				-
Total Demand Response - Capacity Resources PY 2020-2021 (ZRC)				-
PY 2021-UCAP				-
				-
				-
				-
				-
				-
				-
Total Demand Response - Capacity Resources PY 2021-2022 (ZRC)				-
PY 2022-UCAP				-
				-
				-
				-
				-
				-
Total Demand Response - Capacity Resources PY 2022-2023 (ZRC)				-

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,)
to open a docket for load serving entities in)
Michigan to file their capacity demonstrations as) Case No. U-20154
required by MCL 460.6w.)
_____)

AFFIDAVIT OF [Name of Company Officer]

STATE OF MICHIGAN

COUNTY OF (County name)

[NAME of Company Officer], being duly sworn, states that the following information and attached exhibits are true and accurate to the best of his/her reasonable knowledge and belief, regarding [the company's] satisfaction of its Michigan capacity demonstration requirements:

1. [Description of role and responsibilities within company]
2. [Overview of company]
3. [Overview of filing – if applicable for LSE, describe the load in each RTO, each local resource zone, and each service territory]
4. **Existing Generation - Owned** [Claim ownership of the unit(s), including a commitment of the unit(s) to LSE load in the applicable Michigan zone four years forward. (If this does not apply to your LSE, state that it is not applicable in planning year 20**-20**.)]
5. **Existing Demand Response or Energy Efficiency Resources (Not Netted Against Load)** [Outline the resource(s), including a commitment to maintain at least that same level of resources four years forward. If an AES has a LMR, describe how the transmission losses are applied in each service territory. (If this does not apply to your LSE, state that it is not applicable in planning year 20**-20**.)]
6. **Existing Demand Response or Energy Efficiency Resources (Netted Against Load)** [Outline what is netted against load, current programs, and how big these programs are.]
7. **New or Upgraded Generation – Owned** [Outline the detailed plans for the new generation including milestones such as planned in-service date, expected regulatory approval date(s), planned date to enter the MISO generator interconnection queue, expected date for MISO

generator interconnection agreement, construction timeline, etc. (If this does not apply to your LSE, state that it is not applicable in planning year 20**-20**.)]

8. **New Demand Response or Energy Efficiency Resources (Not Netted Against Load)** [Outline the plans for the resource(s), including a commitment to achieve and/or maintain at least that same level of resources four years forward. If an AES has a LMR, describe how the transmission losses are applied in each service territory. (If this does not apply to your LSE, state that it is not applicable in planning year 20**-20**.)]

9. **Existing Generation (Capacity Contract)** [Include a copy of the contract that specifies the unit(s) or pool of generation that is the source of the contract, including the location of the unit(s) or pool (can be filed confidentially) and state commitment to maintain the contracted amount four years forward regardless of any early out clauses in the contract. In lieu of filing a copy of the contract(s), provide information set forth in the MPSC Order on Rehearing in Case No. U-18197, dated November 21, 2017, for Staff/Commission contract review. (If this does not apply to your LSE, state that it is not applicable in planning year 20**-20**.)]

10. **Forward ZRC Contracts** [Include a copy of the contract that specifies the zonal locations of the ZRCs. The affidavit should include a commitment to maintain the contracted amount four years forward regardless of any early out clauses in the contract. In lieu of filing a copy of the contract(s), provide information set forth in the MPSC Order on Rehearing in Case No. U-18197, dated November 21, 2017, for Staff/Commission contract review. (If this does not apply to your LSE, state that it is not applicable in planning year 20**-20**.)]

11. **Planning Reserve Auction Purchases** (If this does not apply to your LSE, state that it is not applicable in planning year 20**-20**.)

NAME

SUBSCRIBED AND SWORN TO BEFORE ME on the ____ day of [month], [year].

Notary Public

My Commission Expires: _____

ALTERNATIVE ELECTRIC SUPPLIER LOAD SWITCHING AFFIDAVIT

State of _____

County of _____

[NAME], [title] of ("Receiving Supplier"), upon oath deposes and states that the following information is true and accurate to the best of his/her reasonable knowledge and belief:

("Receiving Supplier") will assume responsibility for an additional _____ MW in capacity peak load contribution values ("Additional PLC Value") associated with migrating customer load in _____ service territory for Planning Year 20** - 20**, over and above ("Receiving Supplier's") capacity demonstration obligation. ("Receiving Supplier") understands that the customer load reflected in this Additional PLC Value is currently the responsibility of ("Losing Supplier").

This Affidavit is being provided at the behest of the Michigan Public Service Commission Staff, in furtherance of implementation of Section 6w of Public Act 341.

NAME

SUBSCRIBED AND SWORN TO BEFORE ME on the _____ day of [month], [year].

Notary Public

My Commission Expires: _____

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

**In the matter, on the Commission's own motion,)
to open a docket for load serving entities in)
Michigan to file their capacity demonstrations as) Case No. U-20154
required by MCL 460.6w.)
_____)**

PROOF OF SERVICE

Linda G. Brauker, being duly sworn, deposes and says that on August 9, 2018, A.D., she emailed a copy of the attached MPSC Memorandum and Staff Report to the persons as shown on the attached list.



Linda G. Brauker

Subscribed and sworn to before me
this 9th day of August, 2018.

Lisa Felice
Notary Public, Eaton County, Michigan
My Commission Expires: April 15, 2020

Service List for U-20154

Northern States Power Company; Upper Peninsula Power Company

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Miller Canfield Paddock & Stone, PLC
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Lansing, MI 48933
wellmans@millercanfield.com

DTE Electric Company

Andrea Hayden
DTE Energy
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Detroit, MI 48226
andrea.hayden@dteenergy.com

Alpena Power Company

Vicki M. Goodburne
vmg@alpenapower.com

Cloverland Electric Co-Operative; FirstEnergy Solutions, Corp.

Michael G. Oliva
Loomis Ewert Parsley Davis & Gotting
124 W. Allegan St., Ste. 700
Lansing, MI 48933
mgoliva@loomislaw.com

Constellation NewEnergy, Inc.; Constellation Energy Services, Inc.

Jennifer Utter Heston
Fraser Trebilcock Davis & Dunlap, PC
124 W. Allegan St., Ste. 1000
Lansing, MI 48933
jheston@fraserlawfirm.com

Indiana Michigan Power Company

Richard J. Aaron
Dykema Gossett
Capitol View
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Upper Michigan Energy Resources Corporation; Wisconsin Electric Power Company

Michael C. Rampe
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Consumers Energy Company

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