

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter, on the Commission's own motion,)	
to open a contested case proceeding for determining)	
the process and requirements for a forward locational)	Case No. U-18444
requirement under MCL 460.6w for the following)	
named parties:)	
)	
ALPENA POWER COMPANY, et al.)	
_____)	

At the September 13, 2018 meeting of the Michigan Public Service Commission in Lansing,
Michigan.

PRESENT: Hon. Sally A. Talberg, Chairman
Hon. Norman J. Saari, Commissioner
Hon. Rachael A. Eubanks, Commissioner

ORDER

On June 28, 2018, the Commission issued an order in this docket, (June 28 order), that, among other things, imposed an individual forward locational requirement under 2016 PA 341 (Act 341), MCL 460.6w, for all electric providers in Midcontinent Independent System Operator, Inc.'s (MISO) Zone 7 for planning years 2022/2023 and 2023/2024.¹ On July 12, 2018, the Michigan Court of Appeals issued its opinion in *In re Reliability Plans of Electric Utilities for 2017-2021*, ____ Mich App ____, ____; ____ NW2d ____ (2018) (Docket Nos. 340600 and 340607); slip op at 11-12, reversing and remanding the Commission's September 15, 2017 order in Case No. U-18197 (September 15 order), and holding that the Commission lacked the statutory

¹ MCL 460.6w is referred to throughout this order as "Section 6w."

authority to impose a local clearing requirement on individual alternative electric suppliers (AESs). The Association of Businesses Advocating Tariff Equity (ABATE) and Energy Michigan, Inc. (Energy Michigan) each filed a claim of appeal, appealing the Commission's June 28 order before the Michigan Court of Appeals. On July 24, 2018, Energy Michigan filed a petition for rehearing and reconsideration. Then, on August 17, 2018, Energy Michigan filed a motion for stay of the effect of the Commission's June 28 order imposing the individual forward locational requirement for the resource adequacy demonstrations to be made by AESs in February 2019.² This order grants Energy Michigan's motion for stay of the effect of the Commission's June 28 order.

Energy Michigan, Inc.'s Motion for Stay

On August 17, 2018, Energy Michigan filed a motion for stay, requesting that the Commission grant a stay of the effect of the individual forward locational requirement imposed in its June 28 order for the resource adequacy demonstrations to be made by AESs in February 2019. In its motion, Energy Michigan explains that a three-judge panel of the Michigan Court of Appeals unanimously reversed and remanded the Commission's September 15 order and concluded that the Commission lacks the statutory authority to create an individual forward locational requirement for AESs in *In re Reliability Plans of Electric Utilities for 2017-2021*. It also references the petition for rehearing it filed on July 24, 2018, as well as Consumers Energy Company's (Consumers) answer in response to that petition. It requests that the Commission stay the implementation of its June 28 order and otherwise allow AESs to meet capacity obligations in a manner consistent with MISO's requirements in light of the Court's opinion in *In re Reliability*

² The Commission received written comments from the Michigan Chemistry Council, the Michigan Schools Energy Cooperative, Oakland County, and ABATE in support of granting Energy Michigan's motion to stay.

Plans of Electric Utilities for 2017-2021. Energy Michigan further argues that, if the Commission allowed the individual forward locational requirements to remain in place for the upcoming several weeks and months that may pass while appeals are pending, Energy Michigan's AES members will have to start contracting for in-zone resources to meet their respective requirements, which the Court has already determined are unlawful. Energy Michigan further asserts that the costs to customers if its AES members are required to obtain in-zone capacity to meet the individual forward locational requirement are "likely to be at least several million dollars in the aggregate, and will thus be unduly harmful to both AESs and their customers." Energy Michigan's motion for stay, p. 4. Energy Michigan also states that the very harms that the Court sought to avoid by reversing the September 15 order will nevertheless be imposed due to procedural timelines. It asserts that, even if the Commission's and Consumers' requests for leave to appeal the Court's reversal of the September 15 order fail, it will be too late for AESs to avoid entering into four-year-forward contracts and being contractually bound to require customers to unnecessarily spend what is likely to be millions of dollars for in-state capacity. Accordingly, Energy Michigan requests that the Commission stay the implementation of its June 28 order.

Consumers Energy Company's Response

Consumers argues that the Commission should deny Energy Michigan's motion, because it fails to meet the legal standard for consideration of a motion to stay. According to Consumers, Energy Michigan has not shown that its AES members will suffer irreparable injury if a stay of the June 28 order is not granted, asserting that the allegation of potential harm is "vague, uncertain, and unsupported by fact." Consumers' response, p. 3. Consumers focuses on language in Energy Michigan's motion that it "believes" financial harm is "likely" to occur if a stay is not granted. According to the utility, Energy Michigan's "belief" about amounts that AESs are "likely" to

spend absent a stay, which is unsupported by any assertion or affidavit providing the reason for such “belief,” is not sufficient to show that the AESs “will suffer” any injury in the event they are required to make capacity demonstrations consistent with the June 28 order. Consumers points out that, for planning year 2022, the updated locational requirement that AESs are required to make no later than February 11, 2019, in Case No. U-20154 is 2.7% of their peak demand that must be supplied by in-zone resources for planning year 2022. According to the utility, Energy Michigan does not demonstrate why requiring any AES to individually meet the 2.7% locational requirement for planning year 2022 will result in any harm to the AES. Consumers points to testimony by company witness David F. Ronk, Jr., Executive Director of Transactions and Wholesale Settlements in the Energy Supply Operations Department, that, based on data provided by Constellation New Energy, Inc. (an AES) in Case No. U-18197, the estimated amount of available capacity located in Zone 7 during planning year 2019 could address approximately 50% of the AESs’ peak demand in that year. Consumers’ response, p. 5. Consumers argues that the amount of capacity available in Zone 7 would be significantly more than sufficient to support AESs meeting a 2.7% locational requirement. In light of the amount of potentially available capacity and the minimal 2.7% locational requirement necessary to comply with the June 28 order, Consumers asserts that Energy Michigan’s contention that meeting this requirement will cost AESs “millions of dollars” is surprising. It argues that Energy Michigan has not supported the amount of these costs or the reasons these costs are “likely.”

Further, Consumers argues that Energy Michigan has not demonstrated that those costs represent an irreparable injury and cites to case law that “economic injuries are not irreparable, as they can be remedied at law.” Consumers’ response, p. 5. Therefore, according to the utility,

Energy Michigan has not satisfied the first factor for determining whether a stay should be granted.

Consumers also argues that Energy Michigan fails to make a “strong showing” that it is likely to prevail on the merits. Consumers points out that neither the Commission nor Consumers agrees that the Court of Appeals’ decision in *In re Reliability Plans of Electric Utilities for 2017-2021* was correctly decided, pointing out that both the Commission and Consumers have applied to the Michigan Supreme Court for leave to appeal this opinion. The utility points to case law suggesting that the Michigan Supreme Court gives “respectful consideration” to an agency’s interpretation of a statute and that interpretation should not be overruled without cogent reasons. Consumers’ response, p. 7. It maintains that the Court of Appeals provided no cogent reason to reverse the September 15 order. Therefore, Consumers asserts that, given the likelihood the Michigan Supreme Court will grant leave to appeal the Court of Appeals’ opinion *In re Reliability Plans of Electric Utilities for 2017-2021* and the likelihood that the case was wrongly decided, Energy Michigan has failed to meet the second factor for determining whether the Commission should issue a stay.

Regarding the third factor, Consumers asserts that the public interest will be harmed if Energy Michigan’s motion is granted. Consumers references language in the September 15 order and the June 28 order where the Commission emphasizes the importance of establishing an individual locational requirement to ensure the reliability of Michigan’s electric grid. Consumers’ response, pp. 7-8. It continues by pointing out that staying the June 28 order harms the public interest because it continues the status quo and delays Michigan from promoting the long-term reliability of its electric grid. Consumers states that the individual forward locational requirement that the Commission set for planning year 2022 is a minimal requirement that AESs should not have

trouble meeting but an important one as it ensures all electric providers contribute to long-term resource adequacy in Michigan. According the utility, this harm to the public interest weighs in favor of denying the stay.

Last, regarding the fourth factor, Consumers asserts that the harm to itself and the public in granting the stay outweighs the harm to Energy Michigan's AES members in the absence of a stay. The utility reiterates that the harm Energy Michigan believes will occur is unsupported, and that Energy Michigan does not explain how it quantified the "millions of dollars in harm" to its AES members. Consumers' response, p. 9. Conversely, Consumers asserts that the public interest will be harmed if the stay is granted because the stay will impede the legislative and Commission efforts to promote the long-term reliability of the electric grid in Michigan. Consumers further points out that it will be harmed by the continued delay in requiring all electric providers, including AESs, to contribute to meeting the Zone 7 local clearing requirement (LCR). Consumers asserts it would be required to assume a greater amount of risk and its retail customers would be required to assume a greater amount of cost. Consumers states that Energy Michigan's position that denial of the stay results in AESs spending millions demonstrates that incumbent utilities are subsidizing AESs' capacity imports and providing a valuable reliability service without being compensated by AESs or their customers. According to Consumers, Energy Michigan has not shown that its potential harm exceeds that of Consumers or the harm to the public and therefore the utility asserts that Energy Michigan has not met the fourth factor for determining whether a stay should be granted.

DTE Electric Company's Response

In response, DTE Electric Company (DTE Electric) first points out that Consumers has filed for leave to appeal the Court of Appeals' opinion in *In re Reliability Plans of Electric Utilities for*

2017-2021, and that, as Consumers pointed out in answering Energy Michigan's petition for rehearing in this docket, Consumers' action of requesting permission to appeal that opinion stays its effectiveness. According to DTE Electric, Energy Michigan appears to concede this point by filing its motion to stay the June 28 order. DTE Electric further asserts that granting either the stay or the petition for rehearing has a similar effect in the short term of requiring Michigan electric utilities to continue "to unfairly backstop the reliability needs of electric choice customers." DTE Electric's response, p. 2. DTE Electric asserts that both it and Consumers explained why maintaining the electric reliability status quo in Michigan would be inappropriate and unjust to Michigan's electric utilities and their full-service customers. The utility continues that it is not possible for Energy Michigan or its AES members to be actually harmed by the implementation of the June 28 order.

DTE Electric also cites various Michigan Rules of Court that set forth when a judgment may and may not be set aside, the authority of a trial court over stay matters, and when a motion for a stay pending appeal may be filed in the Court of Appeals. See DTE Electric's response, p. 3, citing MCR 7.208 and 7.209. The utility continues that, if the Commission decides to grant Energy Michigan's request for a stay, DTE Electric respectfully requests that the Commission also order, as a condition of issuing any stay, that Energy Michigan and its member AESs post a bond of "at least several million dollars in the aggregate," which Energy Michigan itself claims would be necessary to properly implement the Commission's June 28 order.³ DTE Electric's response, pp. 3-4.

³ The Commission rejects DTE Electric's request that it require Energy Michigan and its member AESs to post a bond because this matter is outside the scope of the motion presently before it.

Staff

The Staff filed a letter informing the Commission that it would not be filing a response to Energy Michigan's motion for a stay in this matter.

Discussion

Pursuant to the Administrative Procedures Act of 1969, MCL 24.201 *et seq.*, the Commission may grant a stay "upon appropriate terms." MCL 24.304(1). In order to determine what constitutes "appropriate terms," the Commission considers the four criteria in MCR 7.119(E)(3): (1) the moving party will suffer irreparable injury if a stay is not granted; (2) the moving party made a strong showing that it is likely to prevail on the merits; (3) the public interest will not be harmed if a stay is granted; and (4) the harm to the moving party in the absence of a stay outweighs the harm to the other parties to the proceedings if a stay is granted. *See*, May 30, 2018 order in Case Nos. U-18258 et al., pp. 3, 5; June 29, 2004 order in Case No. U-13764, pp. 3-4; and, April 12, 2011 order in Case No. U-16200, p. 7.

Energy Michigan claims that it will suffer harm if a stay is not granted, asserting that the cost to AESs and their customers from unnecessarily contracting for in-state capacity four years ahead of time could likely be several millions of dollars in the aggregate. Consumers and DTE Electric question whether Energy Michigan has sufficiently demonstrated that it will suffer irreparable harm, with Consumers asserting that Energy Michigan has not supported its position with an affidavit or other evidence.

A movant may show irreparable harm by demonstrating more than "mere apprehension of future injury" or harm that is "speculative or conjectural." *Michigan AFSCME Council 25 v Woodhaven-Brownstown Dist*, 293 Mich App 143, 149; 809 NW2d 444 (2011). The Commission notes that the movant's alleged injury must be "evaluated in light of the totality of the

circumstances affecting, and the alternatives available to” the movant. *Id.* According to case law, economic harm is insufficient to show injury when damages may be remedied at law. *Alliance for Mentally Ill of Mich v Dep’t of Community Health*, 231 Mich App 647, 665; 588 NW2d 133 (1998).

Having considered Energy Michigan’s motion, and the responsive arguments of Consumers and DTE Electric, the Commission agrees with Energy Michigan that AESs that become contractually bound to those generating in-state electricity will pass on those costs to their customers and that, in aggregate, these costs could amount to several millions of dollars. The Commission does not need an affidavit or other evidence to take official notice of the fact that, before the Commission’s June 28 order, Michigan has never required electric providers to source a percentage of their peak demand from within Zone 7, and that this new standard represents a new individual forward locational requirement that all electric providers, including AESs, must meet. The Commission is also aware of the fact that, to meet the new capacity demonstration requirements, AESs may be required to enter into four-year-forward contracts for in-zone capacity when the legal question of the Commission’s statutory authority to impose an individual forward locational requirement on AESs is a pending judicial matter that remains unsettled. The costs of contracting for in-zone capacity, though not substantiated with any degree of precision by Energy Michigan in its motion, are real costs that are neither “speculative nor conjectural.” In addition, forward in-zone capacity contracts with third parties do not fall under the Commission’s jurisdiction or authority, and the Commission is both skeptical and unsure of the extent to which these contract costs, should Michigan law determine them to be unnecessary, can be considered “damages that may be remedied at law.” Accordingly, the Commission finds that Energy Michigan has demonstrated that harm will occur to AESs and their customers if the Commission

denies Energy Michigan's motion and the Court of Appeals' opinion in *In re Reliability Plans of Electric Utilities for 2017-2021* is upheld. In addition, when considering "the totality of the circumstances" affecting Energy Michigan and its AES members, the broader implications of both the landmark legislation in Act 341 and the Commission's new forward locational requirements for the energy market, and the lack of alternatives other than compliance with Act 341 and these requirements, the Commission further finds that this harm has the potential to be "irreparable."

Turning to the second factor, the Commission next considers whether Energy Michigan has demonstrated that it will prevail on the merits. The Commission is not clairvoyant and cannot determine with any certainty the likelihood that Energy Michigan and ABATE will prevail on the merits of their appeals of the June 28 order currently pending before the Court of Appeals in COA docket nos. 344741 and 344744 or the likelihood that Consumers' and the Commission's applications for leave to appeal the Court of Appeals' opinion in *In re Reliability Plans of Electric Utilities for 2017-2021* currently pending before the Michigan Supreme Court in Docket Nos. 158305, 158306, 158307, and 158308 will be granted. Yet, the Commission acknowledges that the legal question of its statutory authority to impose individual forward locational requirements on AESs has not been conclusively determined. The Commission also acknowledges, as Energy Michigan points out in its motion, that the Court of Appeals reversed and remanded the Commission's September 15 order in *In re reliability plans of Electric Utilities for 2017-2021*. The Commission remains resolute in its interpretation of its statutory authority on this issue, but recognizes that this issue will ultimately be determined in a court of law. If the Commission were to have the final say on this issue, it would be clear that Energy Michigan would not be able to satisfy this criterion for granting a motion to stay. However, the Commission readily

acknowledges that this legal question has yet to be fully and completely determined and that this uncertainty, in light of recent published Court of Appeals' precedent, supports a stay.

The next factor the Commission must consider is the harm to the public interest if a stay is granted. Energy Michigan asserts that there is no immediate threat to electric reliability that will ensue if the Commission grants the stay which the Staff itself has acknowledged. Once again, this assertion, although accurate in the context of current conditions, does depend on unforeseeable factors outside of the Commission's control. The Commission cannot foretell whether the 10% cap on electric choice will remain in the future or whether the State Legislature will enlarge the electric choice market. The Commission also refrains from speculating on whether electric import capabilities will remain at the levels that exist today and the implication of any such changes. Although Energy Michigan correctly states that, given current conditions, no immediate electric reliability crisis is looming on the horizon that mitigates against granting the motion to stay, this assertion does not, in and of itself, tell the whole story. The harm to the public interest in granting the stay is that, in failing to plan to meet MISO's LCR four years forward, there is a risk that MISO's LCR may not be met in Zone 7, when the MISO planning year becomes the prompt year. As Consumers and DTE Electric have noted, the need for advance planning was acknowledged when the State Legislature enacted Act 341, placing the Commission in the position of determining the capacity demonstration process and procedure as set forth in Section 6w. The Commission continues to accept its responsibility to ensure the long-term reliability of Michigan's electric grid and understands that advance planning plays a crucial role. Nevertheless, the Commission recognizes that, in deciding whether to grant a stay, consideration and balancing of competing harms is required, and that the harm to the public of temporarily staying this advance

planning tool for the duration of the litigation process must be weighed against the costs that electric providers must pay to meet in-zone capacity requirements.

Turning to this last factor, the Commission considers whether the harm to the moving party in the absence of a stay outweighs the harm to the other parties to the proceedings if a stay is granted. Energy Michigan has stated in its motion that the financial costs that could result to AESs and their customers from unnecessarily contracting for in-state capacity would be several million dollars in aggregate. Although Consumers questions the veracity of this assertion, its reliance on testimony about the amount of available in-zone capacity does not discredit Energy Michigan's argument that AESs will have to enter into forward in-zone capacity contracts. The Commission recalls the testimony of Staff witness Roger Doherty, who testified that none of the AESs currently own resources in Zone 7. *See*, 2 Tr 272. He further questioned the ability of AESs to obtain financing and build in-zone generation to meet four-year-forward obligations. *Id.* The Commission deduces from this testimony that AESs will be entering into forward contracts for in-zone capacity in order to meet individual forward locational requirements, and that those contracts will come at a cost. Whether the planning year 2022 requirement will equal the "several millions of dollars in the aggregate" value that Energy Michigan asserts or some other similar dollar figure, the costs themselves are real and not imagined. In contrast, Consumers points out that it will be harmed by the grant of a stay because it and its full-service customers, along with those of other Michigan incumbent utilities, must continue to bear the risk and cost of zonal reliability for the duration of the stay. Although Consumers has identified a real and competing harm, the Commission believes that this short-term burden is outweighed by the irreparable harm Energy Michigan and its AES members will suffer if the Commission were to deny a stay. Accordingly, the Commission concludes that Energy Michigan's motion to stay should be granted.

THEREFORE, IT IS ORDERED that Energy Michigan, Inc.'s motion to stay the effect of the June 28, 2018 order is granted.

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 mpscedockets@michigan.gov and to the Michigan Department of the Attorney General – Public Service Division at pungpl@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

Sally A. Talberg, Chairman

Norman J. Saari, Commissioner

Rachael A. Eubanks, Commissioner

By its action of September 13, 2018.

Kavita Kale, Executive Secretary

PROOF OF SERVICE

STATE OF MICHIGAN)

Case No. U-18444

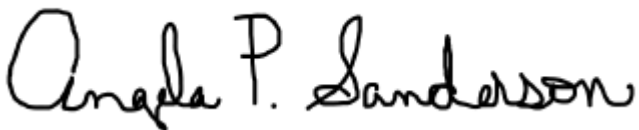
County of Ingham)

Lisa Felice being duly sworn, deposes and says that on September 13, 2018 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).



Lisa Felice

Subscribed and sworn to before me
this 13th day of September 2018



Angela P. Sanderson
Notary Public, Shiawassee County, Michigan
As acting in Eaton County
My Commission Expires: May 21, 2024

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