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April 5, 2019

Ms. Kavita Kale, Executive Secretary
Michigan Public Service Commission
7109 W. Saginaw Hwy.
Lansing, MI 48917

RE: *Complaint of Cypress Creek QFs*
MPSC Docket No. U-20516

Dear Ms. Kale:

Enclosed herewith for filing in the above-referenced matter, please find the ***Joint Complaint of The Cypress Creek QFs Against Consumers Energy Company and Request For Expedited Relief*** with attachments.

If you have any questions or concerns with the enclosed, please do not hesitate to contact me.

Very truly yours,

Fraser Trebilcock Davis & Dunlap, P.C.



Jennifer U. Heston

JUH/ab
Enclosures

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the joint complaint of)
the CYPRESS CREEK QFs against)
CONSUMERS ENERGY COMPANY)
for unjust, unreasonable and improper)
practices under federal and state law.)

Case No. U-20516

JOINT COMPLAINT
OF THE CYPRESS CREEK QFs
AGAINST CONSUMERS ENERGY COMPANY
AND REQUEST FOR EXPEDITED RELIEF

NOW COME the Cypress Creek QFs,1 by and through their attorneys, Fraser,
Trebilcock, Davis & Dunlap, P.C., and pursuant to MCL 460.58 and Rule 439 of the Rules of

1 13 Mile Solar, LLC, AMT Solar, LLC, Abhurite Solar, LLC, Adamite Solar, LLC, Adams Solar, LLC, Addle Solar, LLC, Agrelite Solar, LLC, Agroscape Solar, LLC, Alacrity Solar, LLC, Albion North Solar, LLC, Alma Solar, LLC, Alpinist Solar, LLC, Anatole Solar, LLC, Angola Solar, LLC, Arb Solar, LLC, Arctite Solar, LLC, Arrowhead Solar, LLC, Artisan Solar, LLC, Asparagus Solar, LLC, Atom Solar, LLC, Au Gres Solar, LLC, Aubil Solar, LLC, Aurelius Solar, LLC, Babbitt Solar, LLC, Bamboo Solar, LLC, Banfield Solar, LLC, Barkskin Solar, LLC, Beaverton Solar, LLC, Belgrade Solar, LLC, Bellburns Solar, LLC, Beryllium Solar, LLC, Bibbins Solar, LLC, Big Prairie Solar, LLC, Big Stone Solar, LLC, Bluebird Solar, LLC, Bodega Solar, LLC, Bohne Solar, LLC, Booth Drain Solar, LLC, Borelly Solar, LLC, Bradshaw Solar, LLC, Brandt Solar, LLC, Breckenridge Solar, LLC, Brogan Solar, LLC, Buena Vista Solar, LLC, Bullhead Solar, LLC, Bunny Solar, LLC, Burns Park Solar, LLC, Burr Solar, LLC, Burt Solar, LLC, Byrne Solar, LLC, Cadillac Solar, LLC, Canal Solar, LLC, Capetown Solar, LLC, Captain Solar, LLC, Castleton Solar, LLC, Cayenne Solar, LLC, Cloudbreak Solar, LLC, Cobb Solar, LLC, Coldwater Solar, LLC, Columbia Solar, LLC, Coman Solar, LLC, Congo Solar, LLC, Coolidge Solar, LLC, Copenhagen Solar, LLC, Coronado Solar, LLC, Cowboy Solar, LLC, Custer Solar, LLC, Dantes Solar, LLC, Demings Lake Solar, LLC, Devils Lake Solar, LLC, Dimanche Solar, LLC, Domingo Solar, LLC, Donny Solar, LLC, Douglass Solar, LLC, Dram Solar, LLC, Duffield Solar, LLC, Durban Solar, LLC, El Ray Solar, LLC, Elsie Solar, LLC, Endymion Solar, LLC, Esmarelda Solar, LLC, Fabienne Solar, LLC, Famous Rays Solar, LLC, Ferris Solar, LLC, Fillmore Solar, LLC, Fortunate Sun Solar, LLC, Frehley Solar, LLC, Frontier Solar, LLC, Frontier's Edge Solar, LLC, Fulton Solar, LLC, Geddes 1 Solar, LLC, Geddes 2 Solar, LLC, Gladwin Solar, LLC, Glennie Solar, LLC, Gobi Solar, LLC, Goethe Solar, LLC, Gola Solar, LLC, Goldfinch Solar, LLC, Gordonville Solar, LLC, Gorman Solar, LLC, Granite Solar, LLC, Greasy Jim Solar, LLC, Grimke Solar, LLC, Groucho Solar, LLC, Grover Solar, LLC, Gull Lake Solar, LLC, Hanging Gardens Solar, LLC, Hatchet Solar, LLC, Hazel Solar, LLC, Hendershot Solar, LLC, Hermosa Solar, LLC, Herring Solar, LLC, Hogan Solar, LLC, Honey 1 Solar, LLC, Horton Solar, LLC, Hubbard Lake Solar, LLC, Hyperion Solar, LLC, Ignatius Solar, LLC, Ikeya Solar, LLC, Imaeda Solar, LLC, Incandenza Solar, LLC, Interchange Solar, LLC, Iron Solar, LLC, Jack Francis Solar, LLC, Jackie Solar, LLC, Jacks Lake Solar, LLC, Jeffery Solar, LLC, Jellyfish Solar, LLC, Jimmie Solar, LLC, Jody Solar, LLC, Johnsfeld Solar, LLC, Jolly Green Solar, LLC, Jordanelle Solar, LLC, Kaline Solar, LLC, Keitel Solar, LLC, Kellen Solar, LLC, Kennan Solar, LLC, Khonsu Solar, LLC, Kinbote Solar, LLC, Kissinger Solar, LLC, Knockhill Solar, LLC, Knowlton Solar, LLC, Kochville Solar, LLC, Kofi Solar, LLC, Kubrick Solar, LLC,



Practice and Procedure before the Michigan Public Service Commission (“Commission”), R 792.10439 *et seq.*, hereby file this formal joint complaint against Consumers Energy Company (“Consumers”) for violations of the Public Utility Regulatory Policies Act of 1978, Pub L No 95-617, 92 Stat 3117, 16 USC § 2601 *et seq.* (“PURPA”), implementing regulations promulgated by the Federal Energy Regulatory Commission (“FERC”), this Commission’s orders in Case No. U-18090, and Consumers’ tariff. The Cypress Creek QFs request expedited relief.

This action is necessitated by Consumers’ ongoing violations of state and federal law, the effect of which has been, and continues to be, to impede the development of independent renewable energy generation facilities in Consumers’ service area and the investment of billions of dollars in the State of Michigan. Consumers has refused to comply with the Commission’s clear directives to enter into power purchase agreements (“PPAs”) with: a) the first 150 MW of qualifying facilities (“QFs”) in its interconnection queue at Consumers’ full avoided capacity

Laughing Whitefish Solar, LLC, Lebowski Solar, LLC, Lightfoot Solar, LLC, Lighthouse Solar, LLC, Lineman Solar, LLC, Litchfield Solar, LLC, Littlefield Solar, LLC, Long Lake Solar, LLC, Macbeth Solar, LLC, Mako Solar, LLC, Malbec Solar, LLC, Malibu Solar, LLC, Marty Solar, LLC, Maude Solar, LLC, May Shannon Solar, LLC, McKinley Solar, LLC, Menelaus Solar, LLC, Mia Solar, LLC, Minos Solar, LLC, Mir Solar, LLC, Miracle Max Solar, LLC, Misteguay Solar, LLC, Mitten Solar, LLC, Moonbeam Solar, LLC, Morse Solar, LLC, Mumbai Solar, LLC, Neutron Solar, LLC, Numatism Solar, LLC, Oak Grove Solar, LLC, Oberlin Solar, LLC, Odawa Solar, LLC, Olivier Solar, LLC, Onsted Solar, LLC, Otisville Solar, LLC, Ovid Solar, LLC, Pannonica Solar, LLC, Parma Solar, LLC, Patron Solar, LLC, Pazar Solar, LLC, Peppers Solar, LLC, Petty Solar, LLC, Polk Solar, LLC, Prairie Creek Solar, LLC, Prometheus Solar, LLC, Puck Solar, LLC, Rambling Man Solar, LLC, Reading Solar, LLC, Roethke Solar, LLC, Rosco Solar, LLC, Rosemary Solar, LLC, Rothko Solar, LLC, Ruth Solar, LLC, Salt Lake Solar, LLC, Saltine Solar, LLC, Sand Creek Solar, LLC, Seger Solar, LLC, Shanti Solar, LLC, Sharpe Solar, LLC, Shipsterns Solar, LLC, Sinbad Solar, LLC, Slee Solar, LLC, Snare Solar, LLC, Solis Solar, LLC, Southside Solar, LLC, St. Joseph Solar, LLC, Sticks Solar, LLC, Stockholm Solar, LLC, Stoneheart Solar, LLC, Striker Solar, LLC, Stubbs Solar, LLC, Sunbelievable Solar, LLC, Sunny Acres Solar, LLC, Sunskrit Solar, LLC, Surbrook Solar, LLC, Swan Creek Solar, LLC, Swartz Solar, LLC, Swede Solar, LLC, Taft Solar, LLC, Tangiers Solar, LLC, Tepei Solar, LLC, Thayne Solar, LLC, Thornapple Solar, LLC, Thumper Solar, LLC, Tieman Solar, LLC, Tittabawassee Solar, LLC, Topanga Solar, LLC, Tortuga Solar, LLC, Trammell Solar, LLC, Treasure Solar, LLC, Turtle Solar, LLC, Twin Lake Solar, LLC, Twining Solar, LLC, Typhon Solar, LLC, Uli Solar, LLC, Ulysses Solar, LLC, Union City Solar, LLC, Van Buren Solar, LLC, Victors Solar, LLC, Vincent Solar, LLC, Waldron Solar, LLC, West Hyperion Solar, LLC, Whittum Solar, LLC, Willford Solar, LLC, Wilmore Solar, LLC, Woodlander Solar, LLC, Woodley Solar, LLC, Woodrow Solar, LLC, Zadie Solar, LLC, Zed Solar, LLC, Zeno Solar, LLC, and Zermatt Solar, LLC, (jointly as “Cypress Creek QFs”).

and energy cost rates established by the Commission in Case No. U-18090 (the “Current Full Capacity Rate”), and b) with all other QFs in Consumers’ interconnection queue at the Midcontinent Independent System Operator, Inc. (“MISO”) Planning Resource Auction (“PRA”) rate for capacity and Consumers’ avoided cost rate for energy established by the Commission in Case No. U-18090 (the “Current Energy + PRA Rate”).

Based on their rights under federal law and this Commission’s orders, the Cypress Creek QFs have made repeated attempts to obtain the contracts from Consumers to which they are entitled but have been repeatedly rebuffed. Despite having requested a stay of this Commission’s orders that has not been granted, and subsequently having requested that those orders be rescinded, which request has also not been granted, Consumers has chosen not to comply with those orders. Moreover, even if those orders were to be rescinded, the Cypress Creek QFs are entitled under federal law to contract with Consumers at the rates established in those orders because they have formed “legally enforceable obligations” (or “LEOs”) under PURPA that obligate Consumers to purchase their output at such rates.

The Cypress Creek QFs request that the Commission reaffirm its February 22, 2018 and October 5, 2018 Orders in Case No. U-18090 and order Consumers to promptly enter into avoided cost contracts with the Cypress Creek QFs at the rates approved in those orders. Consumers’ unlawful conduct has already delayed the Cypress Creek QFs planned development of solar energy facilities by over six months and continues to thwart such development and the goals of PURPA and Michigan’s energy policies to the great detriment of the Cypress Creek QFs and the public interest. In support of this complaint, the Cypress Creek QFs state as follows:

I. PARTIES AND JURISDICTION

1. The Cypress Creek QFs are 256 limited liability companies that are all wholly-owned subsidiaries of Cypress Creek Renewables Development, LLC. Cypress Creek Renewables Development, LLC is a wholly-owned subsidiary of Cypress Creek Renewables, LLC (“Cypress Creek”), which manages development activities on behalf of its indirect subsidiaries such as the Cypress Creek QFs. Their principal place of business is at 3402 Pico Blvd, Santa Monica, California 90405. Cypress Creek has extensive experience developing and building solar sites throughout the United States. With more than 2.25 gigawatts of solar energy developed in more than a dozen states, Cypress Creek is one of the country’s leading solar companies. Cypress Creek, through its subsidiaries, is committed to growing Michigan’s energy infrastructure and solar workforce through a planned investment in the state of more than \$3 billion in low-cost, solar energy. The Cypress Creek QFs have approximately 1,876 MW of solar capacity under development in Consumers’ service area. Each complainant is a QF pursuant to 16 USC §§ 796 and 824a-3, and 18 CFR § 292.101(b)(1), and each project under development has been certified as a QF pursuant to 18 CFR § 292.203(a).

2. Consumers is a public corporation organized under the laws of the State of Michigan, with its principal offices located at One Energy Plaza, Jackson, Michigan 49201. Consumers is primarily engaged in public utility operations in Michigan. Consumers provides electric service to approximately 1.8 million customers in the State of Michigan.

3. Consumers retail electric business in Michigan is subject to the Commission’s jurisdiction pursuant to various provisions of 1909 PA 106, as amended, MCL 460.551 *et seq.*, 1919 PA 419, as amended, MCL 460.51 *et seq.*, 1939 PA 3, as amended, MCL 460.1, *et seq.*, 2000 PA 141, as amended, MCL 460.10, *et seq.*, and 2008 PA 295, as amended, MCL 460.1001,

et seq. Under these statutory provisions, the Commission has the power and jurisdiction to regulate Consumers' electric rates, terms and conditions of service in Michigan.

4. Under federal law, 16 U.S.C. § 824a-3(a), FERC is directed to promulgate regulations implementing PURPA, including PURPA's requirement that a utility purchase energy and capacity made available to it by QFs at the utility's avoided cost. This requirement is commonly known as PURPA's "must purchase" obligation. 16 U.S.C. § 824a-3(f) directs state public utility regulatory commissions, such as this Commission, to implement PURPA in a manner consistent with FERC's regulations and orders. The Commission "may comply with the statutory requirements [of PURPA] by issuing regulations, by resolving disputes on a case-by-case basis, or by taking any other action reasonably designed to give effect to FERC's rules."² The Michigan Legislature empowered the Commission to address the requirements under PURPA. *See, e.g.*, MCL 460.6j, 460.6o, and 460.6v. The Commission has implemented PURPA's must purchase obligation with respect to Consumers through its orders issued in Case No. U-18090.

II. STATEMENT OF FACTS

5. Congress enacted PURPA to achieve three primary goals: 1) to provide for increased energy conservation, increased efficiency in the use of facilities and resources by electric utilities, and equitable retail rates for electric customers; 2) to improve the wholesale distribution of electricity and the reliability of electric service; and 3) to provide for the greater use of domestic energy and renewable energy. 16 U.S.C. § 2601.

² *FERC v Mississippi*, 456 U.S. 742, 751 (1982).

6. In addition, PURPA encourages the creation of a market for power from non-utility generators by requiring utilities to buy power from QFs based on the utility's avoided costs. 18 CFR 292.303(a). PURPA's "must purchase" obligation applies to all electric utilities, including Consumers, unless the FERC grants a waiver.³

7. Congress found that one obstacle to the development of alternative energy projects was the reluctance of traditional electric utilities to do business with such projects, in some cases because utilities owned and operated fossil fuel power generation assets that faced competition from alternative energy projects. In response, Section 210 of PURPA created a new class of "favored cogeneration and small power facilities" in the overall regulatory scheme of the nation's energy markets. PURPA directed FERC to promulgate rules requiring utilities to purchase electric energy from QFs, including a "solar, wind, waste, or geothermal facility" that "has a power production capacity which ... is not greater than 80 megawatts." 16 U.S.C. § 796(17)(A).

8. Under PURPA, utilities must purchase electricity from QFs at rates that do not "exceed[] the incremental cost to the electric utility of alternative electric energy." *Id.* § 824a-3(b). That incremental cost is "the cost to the electric utility of the electric energy which, but for the purchase from [the QF], such utility would generate or purchase from another source." *Id.* § 824a-3(d). That cost is commonly referred to as "[a]voided cost." 18 C.F.R. § 292.101(b)(6).

9. FERC's PURPA regulations entitle a QF to select one of two options with respect to how to provide energy to a utility. The QF can provide energy on an "as available"

³ There is no waiver that is applicable to the Cypress Creek QFs, all of which have a nameplate capacity of 20 MW or less. FERC granted Consumers' request to terminate its obligation to enter into new power purchase obligations or contracts to purchase electric energy and capacity from QFs with a net capacity greater than 20 MW effective January 25, 2012. FERC Docket No. QM12-3-000 *et al.*, 139 FERC ¶ 61,069 (April 24, 2012).

basis, at rates based on the utility's avoided-cost at the time of delivery. 18 C.F.R. § 292.304(d)(1). Alternatively, the QF may sell its output "pursuant to a legally enforceable obligation for the delivery of energy or capacity over a specified term, in which case the rates for such purchases shall be based, at the option of the qualifying facility exercised prior to the beginning of the specified term, on either: (i) the avoided costs calculated at the time of delivery; or (ii) the avoided costs calculated at the time the obligation is incurred." 18 C.F.R. § 292.304(d)(2).

10. A LEO is an obligation to sell that can arise either under a contract or by operation of law. As explained by FERC, the purpose of the LEO concept is to prevent utilities from circumventing the requirement of PURPA that they purchase from a QF "by refusing to enter into a contract with a qualifying facility." FERC Order No. 69, FERC Stats. & Regs. ¶ 30,128 at 30,880, 45 Fed. Reg. 12214, 12224. In particular, the LEO concept exists to allow QFs to make substantial fixed-cost investments (as the power-generating utilities themselves do) with the certainty of a known fixed rate of compensation. Likewise, and critical to this case, the LEO concept is meant to prevent utilities from denying QFs more favorable avoided-cost pricing or PPA terms and conditions by delaying contract execution until a time when the methodology or inputs used to calculate avoided costs, or PPA terms and conditions, have been modified.

11. While state commissions have some discretion to determine how a LEO arises, the exercise of discretion must be consistent with PURPA and FERC's implementation of the statute. 16 U.S.C. § 824a-3(f), (g). A LEO must arise from a QF's own commitment to sell to the utility, and not from any action of the utility, because it is the *QF* that, by federal law, "shall

have the option” to choose to deliver electricity pursuant to a LEO and “at the avoided costs calculated at the time the obligation is incurred.” 18 C.F.R. § 292.304(d)(2).

12. State regulatory commissions, such as the MPSC, may not exempt utilities from the obligation to purchase renewable power from QFs, interfere with a QF’s right under PURPA to select the manner in which it will sell its output to the utility, unreasonably interfere with a QF’s right to establish a LEO or otherwise act or fail to act in a manner inconsistent with PURPA or FERC regulations.

13. Michigan’s own energy policies promote local energy resources and encourage private investment in renewable energy. When passing Michigan’s Clean and Renewable Energy and Energy Waste Reduction Act, 2017 PA 342, MCL 460.1001 *et seq.*, the Legislature made very clear the purpose of the Act. In MCL 460.1001(1)(2), the Legislature stated the following:

(2) The purpose of this act is to promote the development and use of clean and renewable energy resources and the reduction of energy waste through programs that will cost-effectively do all of the following:

(a) Diversify the resources used to reliably meet the energy needs of consumers in this state.

(b) Provide greater energy security through the use of indigenous energy resources available within the state.

(c) Encourage private investment in renewable energy and energy waste reduction.

(d) Coordinate with federal regulations to provide improved air quality and other benefits to energy consumers and citizens of this state.

(e) Remove unnecessary burdens on the appropriate use of solid waste as a clean energy source.

14. Thus, as determined by the Legislature, the public has an interest in increased renewable energy development in the State and in promoting private investment in a diversity of indigenous renewable energy and energy waste reduction resources.

15. On May 3, 2016, the Commission issued an order opening several dockets, including Case No. U-18090, to update the method of avoided cost calculation for each of the Commission's jurisdictional utilities, including Consumers, for the purpose of ensuring compliance with PURPA.

16. Cypress Creek submitted its first generator interconnection application to Consumers on July 26, 2017 through its subsidiary Reading Solar, LLC. Between July 2017 and April 2019, Cypress Creek, through its subsidiaries, submitted over 250 generator interconnection applications to Consumers totaling more than 1.8 GW of new solar generation capacity. Attachment A is a listing of all of the Cypress Creek QFs, including each project's interconnection application submission date.

17. On November 17, 2017, the Commission issued an Opinion and Order ("November 17 Order") approving new avoided cost rates for the Consumers using a hybrid proxy plant method. The method assumes that if Consumers only required additional capacity, then Consumers would build a natural gas combustion turbine plant, and if Consumers required only additional energy, then it would build a natural gas combined cycle plant. The Commission approved for Consumers an avoided capacity cost of \$117,203/MW-year or \$140,505/ZRC-year based on Consumers' cost to construct a natural gas combustion turbine.⁴ The Commission also approved for Consumers five energy pricing options: 1) an "as available" rate using MISO's LMP; 2) a LMP energy rate forecast; 3) a proxy plant variable rate forecast;

⁴ Order dated November 17, 2017, MPSC Case No. U-18090, p. 25.

4) a levelized LMP forecast; and 5) a levelized proxy plant variable cost. Further, the Commission approved a 10-year horizon for determining whether Consumers requires additional capacity.⁵ If Consumers' capacity requirements are met over the next 10 years, then Consumers could make a filing so demonstrating, and after Commission approval, the avoided capacity rate would be reset to the MISO PRA rate.⁶

18. Following the entry of the November 17 Order, a dispute arose as to whether Consumers has a need for additional generation capacity during the ten-year planning horizon approved by the Commission and thus an obligation to pay QFs the Current Full Capacity Rate established by the Commission in the November 17 Order. On February 22, 2018, the Commission issued an order in Case No. U-18090 addressing several motions and petitions for rehearing ("February 22 Order"). Among other things, the Commission found "it appropriate to limit payment of the full avoided capacity cost to the first 150 MWs of new QF capacity in the queue."⁷ The Commission also ordered, "The company shall notify each QF in the queue of its queue position relative to the first 150 MWs and file its queue list with the Staff under seal."⁸

19. The combined effect of the November 17 Order and the February 22 Order was that Consumers was obligated to enter into PURPA PPAs with QFs beyond the first 150 MW in its interconnection queue at the Current Energy + PRA Rate. However, the Commission reopened this proceeding to address two outstanding issues: (1) the terms and conditions to be included in a "standard offer" PPA to be made available to QFs with a capacity of 2 MW or

⁵ *Id.*, pp. 30-31.

⁶ *Id.*, p. 31.

⁷ Order dated February 22, 2018, MPSC Case No. U-18090, p. 13.

⁸ *Id.*

less, and (2) the final form and content of Consumers' standard offer tariff. These issues were resolved by the Commission in its October 5, 2019 order, as discussed below.

20. On March 23, 2018, Cypress Creek tendered to Consumers executed PPAs for the sale of the output from each of 142 Cypress Creek QFs' projects in Consumers' interconnection queue as of March 1, 2018. Accompanying the PPAs (one per QF), was a FERC Form 556 documenting that the QF was properly certified as such, and a letter stating that, by tendering the executed PPA, the QF was making a binding commitment to sell its output to Consumers at the designated rates and pursuant to the terms and conditions set forth in the PPAs, thereby establishing a LEO obligating Consumers to purchase its output at such rates. A copy of the documents tendered to Consumers is attached as Attachment B.

21. Through the tender of these executed PPAs each Cypress Creek QF established a LEO, pursuant to which it had the right to sell and Consumers was obligated to purchase the output of the QF pursuant to the terms of the PPA, including the applicable avoided cost rates then in effect.⁹

22. On August 23, 2018, Cypress Creek tendered to Consumers additional executed PPAs for the sale of the output from 62 additional Cypress Creek QFs' projects. The additional PPAs were for projects that entered Consumers' interconnection queue between March 1, 2018 and August 23, 2018. Accompanying the PPAs (one per QF), was a FERC Form 556 documenting that the QF was properly certified as such, and a letter stating that by tendering the executed PPA, the QF was making a binding commitment to sell its output to Consumers at the designated rates and pursuant to the terms and conditions set forth in the PPAs, thereby

⁹ Because there was still a dispute about the applicable avoided cost rate, the Cypress Creek QFs included the Current Full Capacity Rate in the tendered PPAs, with the expectation that if it was determined that a QF was only entitled to the Current Energy + PRA Rate the PPA rate would be modified accordingly.

establishing a LEO obligating Consumers to purchase its output at such rates. A copy of the documents tendered to Consumers is attached as Attachment C.¹⁰

23. In a subsequent order in Case No. U-18090, issued on October 5, 2018 (“October 5 Order”), the Commission clarified and confirmed that the first 150 MW of QFs should be determined based on priority of entry into Consumers’ interconnection queue.¹¹ The October 5 Order also lifted the Commission’s previous stay of Consumers’ avoided cost rates and approved the final avoided cost rates that, pursuant to PURPA’s must-purchase obligation, Consumers would be required to pay QFs to purchase QF energy and capacity.¹² The October 5 Order also stated that “Consumers Energy Company shall file executed contracts with qualifying facilities in this docket for Commission approval.”¹³

24. In its October 5 Order, the Commission also directed Consumers to move forward with contracts with QFs at the MISO PRA rate for capacity and one of the forecasted energy rates for energy. The Commission stated:

[I]n the meantime, the Commission finds that it is important to finalize this PURPA proceeding and allow the parties to move forward. As the Staff correctly characterize it, the 150 MW need determination is a temporary stopgap measure intended to allow Consumers and QFs to enter into agreements while the IRP proceeding is pending. As the parties know, the limit on the amount of capacity sold at the full avoided cost in no way limits the amount of capacity and energy that may be sold by QFs to Consumers. If that threshold is met, ***QFs may continue to enter into contracts with Consumers at the PRA price for capacity and one of the forecasted energy prices for energy.***¹⁴

¹⁰ These Cypress Creek QFs took the same approach to PPA pricing as has been taken with the March 23, 2218 PPAs.

¹¹ Order dated October 5, 2018, MPSC Case No. U-18090, p. 8.

¹² *Id.*, p. 42.

¹³ *Id.*, p. 44.

¹⁴ *Id.*, pp 17-18 (emphasis added).

25. The right of QFs to enter into contracts with Consumers established by the Commission in the October 5 was not conditioned on the satisfaction by the QF of any eligibility criteria or limited in any other way.

26. On October 26, 2018, Consumers made a “provisional offer” for long-term contracts for the output of 21 of Cypress Creek’s projects. A copy of Consumers’ October 26, 2018 provisional offer is attached as Attachment D. The provisional offer was for projects that Consumers identified were within the first 150 MW of Consumers’ interconnection queue and therefore eligible to receive compensation at the Current Full Capacity Rate pursuant to the October 5 Order. In the same letter, Consumers referred several times to the standard offer PPA that the Commission approved in Case No. U-18090 and attached the standard offer PPA to the offer.

27. In reliance on the Commission’s orders regarding QFs’ rights to contract at both the Current Full Capacity Rate for the first 150 MW in the queue and at the Current Energy + PRA Rate for all other QFs, and in reliance on Consumers’ statements to Cypress Creek regarding projects within the first 150 MW of its interconnection queue, the Cypress Creek QFs continued to develop their projects. These development activities included providing Consumers with study agreements in order to continue to the Distribution Study stage of the interconnection study process and incurring obligations to pay thousands of dollars in study costs. Additionally, Cypress Creek performed preliminary analyses and studies to further refine each QF projects’ design and production characteristics, identify potential land use permit restrictions, and resolve final project boundary and general arrangement details. Also, in reliance on the Commission’s orders and Consumers’ statements to Cypress Creek, Cypress Creek made both reputational and financial commitments to the current landowners of the

proposed project sites and made business and financial plans based on the assumption that these projects had the right to sell their output to Consumers at the applicable rates.

28. On October 26, 2018 Geronimo Energy (“Geronimo”), which is not a party in Case No. U-18090, filed an appeal of the October 5 Order to the Michigan Court of Appeals, along with a motion for partial stay of that order as it related to the allocation of the 150 MW of full capacity PPAs. The Court of Appeals denied Geronimo’s motion for stay.¹⁵

29. Also, on October 26, 2018, Geronimo filed an Application to Present Additional Evidence and Motion for Partial Stay in Case No, U-18090. In its motion, Geronimo argued that eligibility for the 150 MW of PPAs at the Current Full Capacity Rate should be based on temporal priority of LEO formation and the at LEO formation should not be based on interconnection queue priority. Geronimo sought to present additional evidence concerning the steps it had taken to establish LEOs on behalf of its projects in Consumers interconnection queue. Geronimo also asked this Commission to stay that portion of its October 5 Order reaffirming the allocation of the 150 MW of PPAs based on interconnection queue priority. This action was opposed by Staff and all other parties to Case No. U-18090 with the exception of Consumers. In a responsive filing that was procedurally and substantively deficient, Consumers sought a stay of the October 5 Order, not just as to the allocation of the 150 MW but as to all aspects of the Order. Consumers sought to stay the October 5 Order not just during the pendency of the Geronimo appeal, but also until the Commission’s action on Consumers’ proposed integrated resource plan in Case No. U-20165.

30. As of the date of filing of this Joint Complaint, more five months after the filing of these post-judgment motions, the Commission has still not ruled on the motions. However,

¹⁵ *In re Establishing Avoided Cost Calculation for Consumers Energy*, unpublished order of the Court of Appeals, entered November 6, 2018 (MCOA Docket No. 345995).

Consumers has effectively and improperly chosen to stay the October 5 Order itself. That is, despite the fact that no stay has been granted, Consumers has refused to comply with binding orders of this Commission.

31. On November 6, 2018, Cypress Creek provided to Consumers a proposed PPA that Cypress Creek QFs with projects greater than 2 MW were prepared to execute. A copy of this proposed non-standard offer PPA and Cypress Creek's accompanying communication tendering the PPA are attached as Attachment E. The Cypress Creek non-standard offer PPA was identical to the standard offer PPA approved by the Commission in the October 5 Order, with the following modifications that Cypress Creek believed were appropriate for larger projects:

- a. Section 4.3: Outside Start Date time limit extended to 365 days
- b. Section 4.5: Seller termination right if interconnection costs identified in Distribution Study exceed \$125,000/MW
- c. Section 8.3 and Exhibit A, Option 3: Reduction of the Administrative fee to \$0.10 per megawatt-hour.

32. To this day, despite repeated requested from Cypress Creek, Consumers has never responded to Cypress Creek's November 6 proposed non-standard offer PPA. This sort of contract-avoiding behavior by utilities is exactly why FERC created the LEO concept, which allows QFs, through their unilateral action, to obligate utilities to purchase their output.

33. On November 8, 2018, Cypress Creek responded to Consumers' October 26, 2018 communication concerning projects within the first 150 MW and provided Consumers with completed PPA cover sheets for those projects. A copy of Cypress Creek's response is attached as Attachment F.

34. On December 3, 2018, Cypress Creek received a letter from Keith Troyer of Consumers, a copy of which is attached as Attachment G. The letter references Geronimo's

Application to Present Additional Evidence and a Motion for Partial Stay with the MPSC in Case No. U-18090, as well as Geronimo's appeal of the October 5 Order and request for stay with the Michigan Court of Appeals. As a result of a Geronimo's actions, Consumers stated that it "believes it to be in all parties' best interest to pause the process and await a ruling from the MPSC and/or the courts as to the proper determination of the projects with the 150 MW queue." Consumers further stated, "we are unable to offer you an agreement at this time."

35. Consumers' unilateral decision to "pause the process" and not offer Cypress Creek PPAs for any of the Cypress Creek QFs' projects was not authorized by any Commission decision or administrative rule.

36. Consumers' unilateral decision to "pause the process" and not offer Cypress Creek PPAs for any of the Cypress Creek QFs' projects was not authorized by any provision of PURPA or any FERC decision or administrative rule.

37. Consumers' unilateral suspension of actions required by PURPA and the Commission's orders had the same effect as if the Commission had granted the request for stay that Consumers made in response to non-party Geronimo Energy's motion for stay in Case No. U-18090 – thereby unlawfully supplanting the Commission's prerogative and authority to decide the request for stay.

38. On January 16, 2019, Cypress Creek again tendered to Consumers executed PPAs for the sale of the output from each of 241 Cypress Creek QFs' solar projects in Consumers' interconnection queue at the time. For each of the Cypress Creek QFs' projects eligible for the standard offer (i.e., with a nameplate capacity of 2 MW or less), Cypress Creek tendered to Consumers completed and executed versions of the standard offer PPA approved by this Commission in Case No. U-18090. Accompanying the executed PPAs (one per QF),

was a FERC Form 556 documenting that the QF was properly certified as such, and a letter stating that the QF was reaffirming its prior binding commitment to sell its output to Consumers at the designated rates and pursuant to the terms and conditions set forth in the PPA, thereby reaffirming the QF's previously established LEO obligating Consumers to purchase its output at such rates. A copy of the proposed PPAs and accompanying documents are attached as Attachment H.¹⁶

39. For each of the Cypress Creek QFs not eligible for the standard offer (i.e., with a nameplate capacity greater than 2 MW), Cypress Creek tendered to Consumers executed PPAs that were identical to the Standard Offer PPA approved in Case No. U-18090, but with the same modifications that Cypress Creek proposed to Consumers on November 6, 2018, with one additional change: under Section 4.3 the use of a surety bond to satisfy the required Earnest Money Deposit was added given the much larger deposit required from larger projects. More than sixty days had passed since Cypress Creek's first attempt to obtain Consumers' consent to these PPA terms, with no response from Consumers. Accompanying the PPAs (one per QF), was a FERC Form 556 documenting that the QF was properly certified as such, and a letter stating that the QF was reaffirming its prior binding commitment to sell its output to Consumers at the designated rates and pursuant to the terms and conditions set forth in the PPA, thereby reaffirming the QF's previously established LEO obligating Consumers to purchase its output

¹⁶ In these transmittal letters submitted to Consumers on January 16, 2019, the Cypress Creek QFs eligible for the standard offer stated that if Consumers preferred to take the superfluous step of providing PPAs to the QFs to re-execute, to please do so within 15 business days as required by Section C18, paragraph H, of Consumers' tariff (Original Sheet No. C-63.00). More than 50 business days have passed without Consumers complying with this mandate by this Commission.

at such rates. A copy of the proposed PPAs and accompanying documents are included in Attachment I.¹⁷

40. Through the tender of these executed PPAs each Cypress Creek QF reaffirmed its previously established LEO, pursuant to which it had the right to sell and Consumers was obligated to purchase the output of the QF pursuant to the terms of the PPA, including the applicable avoided cost rates then in effect.¹⁸

41. On February 4, 2019, Keith Troyer of Consumers sent a letter to Cypress Creek acknowledging receipt of the Cypress Creel QFs' executed PPAs, a copy of which is attached as Attachment J. Despite this Commission having expressly established the right of QFs to contract with Consumers at the approved avoided cost rates, Consumers claimed that it was not obligated to enter into contracts with the Cypress Creek QFs at the avoided-cost rates established by the MPSC in Case No. U-18090 because the rates, according to Consumers, were "stale." Consumers also denied that the Cypress Creek QFs had established LEOs because the Cypress Creek QFs had not demonstrated that the projects are technically or financially viable – thereby unilaterally adopting eligibility requirements that were neither recognized by this Commission or allowed by PURPA.

42. On February 4, 2019, in Case No. U-20469, Consumers filed an application requesting that the Commission rescind the avoided cost rates that the Commission established in Case No. U-18090. In its application, Consumers asked the Commission to relieve it of the obligations that the Commission's October 5 Order and PURPA impose on it. As of the date

¹⁷ The 21 Cypress Creek QFs that Consumers had identified as being eligible for the Current Full Capacity Rate incorporated that rate into their tendered PPAs, while all other Cypress Creek QFs tendered PPAs at the Current Energy + PRA Rate.

¹⁸ Even if the Cypress Creek QFs prior attempts to establish LEOs were somehow deemed deficient, which the joint complainants do not concede, their actions on January 16, 2019 were unquestionably sufficient to establish LEOs as of that date.

of filing of this Complaint, the Commission has not scheduled a prehearing conference or taken any other action in Case No. U-20469.

43. Also, on February 4, 2019, in Case No. U-18090, Consumers filed a request to withdraw its Standard Offer Tariff. Consumers claims that the Standard Offer Tariff contains rates that do not reflects its actual avoided costs and therefore should be removed from Consumers' rate book. As of the date of filing this Joint Complaint, the Commission has not granted Consumers' request.

44. On April 1, 2019, Cypress Creek tendered to Consumers 15 additional executed non-standard offer PPAs for the sale of the output from Cypress Creek QF projects not included in the January 16, 2019 PPAs.¹⁹ Accompanying the PPAs (one per QF), was a FERC Form 556 documenting that the QF was properly certified as such, and a letter stating that the QF was making a binding commitment to selling its output to Consumers at the designated rates and pursuant to the terms and conditions set forth in the PPA, thereby establishing a LEO obligating Consumers to purchase its output at such rates. A copy of the documents tendered to Consumers is attached as Attachment K.

45. The filing of this Joint Complaint further reaffirms the commitment of the Cypress Creek QFs to sell their output to Consumers pursuant to the terms of the tendered PPAs and further reaffirms their LEOs under PURPA.

46. As of this date, Consumers continues to ignore and violate both PURPA and binding orders of this Commission and to refuse to enter into contracts with the Cypress Creek QFs as required by law.

¹⁹ As these QFs were all larger than 2 MW, they tendered the non-standard offer PPA utilized by Cypress Creek QFs on January 16, 2019.

III. CLAIM 1 – VIOLATION OF COMMISSION ORDERS

47. The facts described above in paragraphs 5 through 34 demonstrate that Consumers has violated the Commission's February 22 Order and October 5 Order in Case No. U-18090.

48. As stated above, the Commission's February 22 Order and October 5 Order clearly directed Consumers to enter into PPAs with QFs in Consumers' interconnection queue, both within the first 150 MW and beyond. Projects within the first 150 MW of Consumers' interconnection queue are entitled to contract with Consumers at the Current Full Capacity Rate established in Case No. U-18090. Projects beyond the first 150 MW of Consumers' interconnection queue are entitled to contract with Consumers at the Current Energy + PRA Rate.

49. As evidenced by Consumers' communications and conduct, Consumers has refused, and continues to refuse, to comply with the Commission's directives, which have not been stayed or revoked.

50. Consumers' refusal to enter into contracts with the Cypress Creek QFs at the avoided cost rates the Commission established in Case No. U-18090 constitutes exactly the sort of behavior that FERC sought to prevent by giving QFs the right to unilaterally establish LEOs. It is the Commission's duty under federal law to implement PURPA's must purchase obligation and the Commission has done so with respect to Consumers through its orders in Case No. U-18090. Consumers has no legal right to substitute its judgment for that of the Commission and defy the Commission's PURPA implementation orders.

51. In the absence of a specific waiver from FERC, which has not been granted here, PURPA and the FERC's implementing regulations apply at all times. Consumers cannot

unilaterally suspend PURPA's must purchase obligation by declining to enter into QF contracts with the Cypress Creek QFs because it believes those rates or the applicable PPA terms and conditions should be modified.²⁰

52. By ordering Consumers to enter into contracts with QFs "based upon the date the interconnection application was received," the Commission found that each QF in the first 150 MW of Consumers' interconnection queue had established a LEO with Consumers for purposes of Case No. U-18090. Cypress Creek QFs within the first 150 MW of Consumers' interconnection queue have thus established LEOs entitling them to contract with Consumers at the Current Full Capacity Rate. Consumers continues to unlawfully disregard the Cypress Creek QFs' LEOs by refusing to execute PPAs with them.²¹

53. Additionally, the Cypress Creek QFs have each made binding commitments to sell their capacity and energy to Consumers, as evidence by fully executed PPAs tendered to Consumers. Regardless whether this Commission may choose to recognize LEO formation based on a lesser demonstration of QF commitment (such as entering the utility's interconnection queue), a QF's tender of an executed PPA to the utility unquestionably

²⁰ While not relevant to the adjudication of QFs' rights under PURPA, the joint complainants note that there is no evidence that any significant volume of solar development can occur in Consumers' service area based on a PPA rate less than the Current Energy + PRA rate and contend that is not the case. In seeking this Commission's approval of its REP in Case No. U-18231, Consumers sought approval to build 100 MW of solar capacity at an effective cost of approximately 2.5 times the Current Energy + PRA Rate. The Commission did not grant the request.

²¹ As noted, in its appeal Geronimo argues that a QF's entry into the interconnection queue alone is not sufficient to establish a LEO and that the tender of a contract by the QF is sufficient. Cypress Creek has previously taken a similar position in proceedings before the Commission and continues to think it is the better statement of the law. However, for the purposes of this Joint Complaint, and the Cypress Creek QFs' claims that they are entitled to contract with Consumers at the Current Energy + PRA Rate it is irrelevant whether those QFs formed LEOs by entering the interconnection queue, by initially tendering signed PPAs to Consumers on March 23, 2018, August 23, 2018, and April 1, 2019, or, in the case of 241 Cypress Creek QFs, by re-tendering signed PPAs to Consumers on January 16, 2019. By any test those QFs formed LEOs while the Current Energy + PRA Rate was in effect (as it still is) and are this entitled to contract with Consumers at that rate. Those Cypress Creek QFs seeking to contract with Consumers at the Current Full Capacity Rate, are within the first 150 MW of QFs to (i) have entered Consumers' interconnection queue, and (ii) to have tendered signed PPAs to Consumers, and thus are also entitled to contract at the Current Full Capacity Rate regardless of which test is applied.

constitutes a commitment to sell its output and thus establishes a LEO at the time the tender is made.

54. Consumers' continued violation of the Commission's orders adversely affect the project development efforts of the Cypress Creek QFs and is continuing to cause severe and irreparable harm to those QFs.

IV. CLAIM 2 – VIOLATION OF PURPA MUST PURCHASE OBLIGATION

55. Because the Commission's February 22 Order and October 5 Order in Case No. U-18090 implement PURPA's must purchase obligation with respect to Consumers and Consumers has refused to comply with those orders, Consumers has also violated the requirements of PURPA. Specifically, by refusing to enter into PPAs with Cypress Creek QFs, Consumers has violated 16 USC § 824a-3(a), (b), and (f), as well as 18 CFR § 292.303(a) and (c) and 18 CFR § 292.304(d).

56. Federal regulations give QFs the unilateral right to create a LEO. 18 CFR §§ 292.304(c)-(d). When a QF creates a LEO, the QF locks in the right to sell its power at the rate, and pursuant to the PPA terms and conditions, in effect at the time. 18 CFR § 292.304(d)(2)(ii) ("Each qualifying facility shall have the option . . . [t]o provide energy or capacity pursuant to a legally enforceable obligation for the delivery of energy or capacity over a specified term . . . based on [t]he avoided costs calculated at the time the obligation is incurred.")

57. By April 1, 2019, each of the 2 MW Cypress Creek QFs had tendered executed PPAs, utilizing this Commission's approved standard offer PPA form, to Consumers, thereby establishing a LEO at the avoided cost rates then in effect.

58. Further, by April 1, 2019, each of the Cypress Creek QFs with a nameplate capacity in excess of 2 MW had tendered executed PPAs under commercially reasonable terms to Consumers, thereby establishing a LEO at the avoided cost rates then in effect.

59. Pursuant to 16 USC § 824a-3(f), the Commission has both jurisdiction and a duty to implement and enforce the requirements of PURPA with respect to Consumers.

V. CLAIM 3 – VIOLATION OF CONSUMERS’ STANDARD OFFER TARIFF

60. Section C18, paragraph H. Execution of Standard PPA, of Consumers’ tariff (Original Sheet No. C-63.00), states, as follows:

In order to execute the Standard PPA, the Seller must complete all of the general project information requested in the applicable Standard PPA. When all information required in the standard PPA has been received in writing from the Seller, the Company will respond within 15 business days with a draft Standard PPA. The Seller may request in writing that the Company prepare a final draft Standard PPA. The Company will respond to this request within 15 business days. In connection with such request, the Seller must provide the Company with any additional or clarified project information that the Company reasonably determines to be necessary for the preparation of a final draft Standard PPA. When both parties are in full agreement as to all terms and conditions of the draft Standard PPA, the Company will prepare and forward to the Seller a final executable version of the agreement within 15 business days.

61. Thus, when a QF with a 2 MW or smaller project provides Consumers with all of the required information requested in the Standard Offer PPA, Consumers must respond within 15 business days either: 1) identifying and communicating to Seller any additional or clarified project information Consumers reasonable determines is needed to prepare a final draft Standard PPA; 2) if no additional or clarified information was necessary, preparing and forwarding to Seller a final executable Standard PPA; or 3) executing the Standard PPA completed and signed by the Seller.

62. On January 16, 2019, Cypress Creek, on behalf of its subsidiary QFs, tendered fully executed standard offer PPAs for each of its projects sized 2 MW and below, thereby reaffirming their unequivocal commitment to sell their output to Consumers pursuant to the terms of those PPAs and re-establishing LEOs under PURPA. However, in light of the language contained in the tariff, the Cypress Creek QFs gave Consumers the option of providing them a substitute (but presumably identical) PPA for execution within 15 business days, as required by the tariff. As of the date of the filing of this Joint Complaint, Consumers has not either (1) executed the Standard PPAs completed and signed by the Cypress Creek QF; (2) identified and communicated to Cypress Creek any additional or clarified project information Consumers reasonably determines is needed to prepare a final draft standard offer PPA; or (3) prepared and forwarded to Cypress Creek a final executable standard offer PPA. Consumers' conduct as alleged herein violates the requirements of Consumers' approved standard offer tariff, as well as violating the orders of this Commission and PURPA.

VI. REQUEST FOR EXPEDITED RELIEF

63. Consumers' unlawful conduct has already delayed the development of the Cypress Creek QF projects by more than six months. This has caused, and is continuing to cause, irreparable harm to the Cypress Creek QFs. As an initial matter, because of Consumers' unilateral and unlawful conduct, the Cypress Creek QFs are at risk of not being able to fully utilize the federal Investment Tax Credit ("ITC"), which is critical to the ability of QFs to develop their projects at the very low Current Energy + PRA Rate. The value of the ITC begins to step down in the year 2020, when it drops from 30% to 26% of qualifying capital expenditures. *See* 26 USC § 48(a)(6). To receive the full tax credit, a facility owner needs to

place the facility in service, commence continuous construction or make a significant capital investment in 2019 or earlier. *Id.*

64. Absent expedited relief, the Cypress Creek QFs will continue to suffer irreparable harm by, among other things, the potential reduction in value of the ITC. The Cypress Creek QFs are at risk of being unable to fully utilize tax benefits to which they are entitled under federal law and on which they relied when planning their solar projects. The value of the Cypress Creek QFs' facilities is significantly affected by the extent to which they are able to utilize the ITC. In each case, the Cypress Creek QFs will be irreparably harmed if not able to fully utilize the ITC, as there is no remedy available to the Cypress Creek QFs to recover lost value.

65. The Cypress Creek QFs are also suffering irreparable harm because they are required to continue incurring cost to preserve land rights and to develop their projects without having certainty about the project's PPA revenues. In addition, to the extent that Cypress Creek might wish to sell its ownership interests in a Cypress Creek QF, it is unable to do (or only able to do so at a greatly reduced sales price) due to the continuing lack of an executed PPA.

66. The Cypress Creek QFs are entitled to an immediate determination that they are entitled to contract with Consumers immediately.

VII. DEMAND FOR A CONTESTED CASE

67. Absent an immediate determination, pursuant to Rule 441(1)(e) of the Commission's Rules of Practice and Procedure, R 792.10441(1)(e), the Cypress Creek QFs request that the Commission issue notice for a pre-hearing conference and set this matter for a contested proceeding.

VIII. CONCLUSION AND PRAYER FOR RELIEF

The Cypress Creek QFs have sought to resolve the above-described issues with Consumers for months without the assistance of the Commission. Because of Consumers' ongoing and extensive violations of PURPA, FERC's implementing regulations, the Commission's orders, and Consumers' own tariff are impeding the development of independent power production in Consumers' service area, the Cypress Creek QFs are now forced to seek relief from the Commission. Consumers continues to disregard this Commission's authority and directives, to violate PURPA, and to frustrate Michigan's energy policies promoting the development of clean and renewable energy resources in this state. This conduct should not be tolerated by the Commission.

WHEREFORE, the Cypress Creek QFs respectfully request that this Commission grant them the following relief:

- A. Order Consumers to immediately enter into contracts to purchase energy and capacity from Cypress Creek QFs within the first 150 MW of Consumers' interconnection queue at the Current Full Capacity Rate established in MPSC Case No. U-18090;
- B. Order Consumers to immediately enter into contracts from Cypress Creek QFs in queue beyond the first 150 MW of Consumers' interconnection queue at the Current Energy + PRA Rate established in MPSC Case No. U-18090; and

C. Grant such other and further relief as is deemed lawful and appropriate.

Respectfully submitted,

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ATTORNEYS FOR THE CYPRESS CREEK QFS



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(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)
CCR ID	Project Name	Project Entity	Utility	MWac	IX Application Number	IX Application Submittal Date - Date	IX Application Submittal Status	Legally Enforceable Obligation Letter Sent Date - Date	Legally Enforceable Obligation Letter Sent Date - Status	Form 556 Accepted Date	FERC Docket Number	
1	MI-002428	13 Mile	13 Mile Solar, LLC	CNSMRS	2	1700191	8/22/2017	completed	3/23/2018	completed	3/20/2018	QF18-806
2	MI-002363	AMT	AMT Solar, LLC	CNSMRS	2	1700164	8/22/2017	completed	3/23/2018	completed	3/9/2018	QF18-698
3	MI-003204	Adams	Adams Solar, LLC	CNSMRS	12	1801381 - Res	10/16/2018	completed	3/23/2018	completed	3/20/2018	QF18-807
4	MI-003257	Agroscape	Agroscape Solar, LLC	CNSMRS	2	1800131	1/26/2018	completed	3/23/2018	completed	3/20/2018	QF18-808
5	MI-003235	Alacrity	Alacrity Solar, LLC	CNSMRS	2	1800142	1/26/2018	completed	3/23/2018	completed	3/20/2018	QF18-809
6	MI-003256	Alma	Alma Solar, LLC	CNSMRS	2	1800132	1/26/2018	completed	3/23/2018	completed	3/20/2018	QF18-810
7	MI-002728	Anatole	Anatole Solar, LLC	CNSMRS	2	1700336	9/15/2017	completed	3/23/2018	completed	3/20/2018	QF18-813
8	MI-002430	Angola	Angola Solar, LLC	CNSMRS	2	1700192	8/25/2017	completed	3/23/2018	completed	3/9/2018	QF18-699
9	MI-002757	Arrowhead	Arrowhead Solar, LLC	CNSMRS	2	1700384	9/30/2017	completed	3/23/2018	completed	3/9/2018	QF18-700
10	MI-002729	Aubil	Aubil Solar, LLC	CNSMRS	2	1700335	9/15/2017	completed	3/23/2018	completed	3/9/2018	QF18-701
11	MI-002365	Aurelius	Aurelius Solar, LLC	CNSMRS	2	1700223	8/25/2017	completed	3/23/2018	completed	3/20/2018	QF18-814
12	MI-002983	Barkskin	Barkskin Solar, LLC	CNSMRS	2	1700525	11/14/2017	completed	3/23/2018	completed	3/20/2018	QF18-815
13	MI-003200	Belgrade	Belgrade Solar, LLC	CNSMRS	10	1800279	3/1/2018	completed	3/23/2018	completed	3/9/2018	QF18-702
14	MI-003272	Beryllium	Beryllium Solar, LLC	CNSMRS	2	1800222	2/16/2018	completed	3/23/2018	completed	3/20/2018	QF18-817
15	MI-002691	Bibbins	Bibbins Solar, LLC	CNSMRS	2	1700334	9/15/2017	completed	3/23/2018	completed	3/9/2018	QF18-703
16	MI-002665	Booth Drain	Booth Drain Solar, LLC	CNSMRS	2	1700385	9/30/2017	completed	3/23/2018	completed	3/9/2018	QF18-705
17	MI-003316	Brandt	Brandt Solar, LLC	CNSMRS	2	1800180	2/9/2018	completed	3/23/2018	completed	3/20/2018	QF18-818
18	MI-002655	Brogan	Brogan Solar, LLC	CNSMRS	2	1700212	9/15/2017	completed	3/23/2018	completed	3/20/2018	QF18-819
19	MI-003398	Buena Vista	Buena Vista Solar, LLC	CNSMRS	20	1800276	3/1/2018	completed	3/23/2018	completed	3/9/2018	QF18-706
20	MI-002467	Bullhead	Bullhead Solar, LLC	CNSMRS	2	1700224	8/25/2017	completed	3/23/2018	completed	3/20/2018	QF18-820
21	MI-003317	Bunny	Bunny Solar, LLC	CNSMRS	2	1800181	2/9/2018	completed	3/23/2018	completed	3/20/2018	QF18-821
22	MI-003369	Burns Park	Burns Park Solar, LLC	CNSMRS	10	1800278	3/1/2018	completed	3/23/2018	completed	3/9/2018	QF18-707
23	MI-002470	Burr	Burr Solar, LLC	CNSMRS	2	1700225	8/22/2017	completed	3/23/2018	completed	3/20/2018	QF18-822
24	MI-002367	Burt	Burt Solar, LLC	CNSMRS	2	1700226	8/25/2017	completed	3/23/2018	completed	3/9/2018	QF18-708
25	MI-003074	Cadillac	Cadillac Solar, LLC	CNSMRS	20	181836	10/16/2018	completed	3/23/2018	completed	3/20/2018	QF18-823
26	MI-002121	Canal	Canal Solar, LLC	CNSMRS	2	1700193	8/22/2017	completed	3/23/2018	completed	3/9/2018	QF18-709
27	MI-002433	Captain	Captain Solar, LLC	CNSMRS	2	1700194	8/22/2017	completed	3/23/2018	completed	3/9/2018	QF18-710
28	MI-002427	Cayenne	Cayenne Solar, LLC	CNSMRS	2	1700195	8/22/2017	completed	3/23/2018	completed	3/9/2018	QF18-711
29	MI-002761	Cobb	Cobb Solar, LLC	CNSMRS	2	1700387	9/30/2017	completed	3/23/2018	completed	3/20/2018	QF18-825
30	MI-002142	Coldwater	Coldwater Solar, LLC	CNSMRS	2	1700196	8/22/2017	completed	3/23/2018	completed	3/9/2018	QF18-712
31	MI-003194	Columbia	Columbia Solar, LLC	CNSMRS	2	1800134	1/26/2018	completed	3/23/2018	completed	3/20/2018	QF18-826
32	MI-002891	Coman	Coman Solar, LLC	CNSMRS	20	1800089	1/18/2018	completed	3/23/2018	completed	3/9/2018	QF18-713
33	MI-002751	Coolidge	Coolidge Solar, LLC	CNSMRS	2	1700382	9/30/2017	completed	3/23/2018	completed	3/20/2018	QF18-827

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)
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34	MI-003199	Copenhagen	Copenhagen Solar, LLC	CNSMRS	20	1800182	2/9/2018	completed	3/23/2018	completed	3/9/2018	QF18-714
35	MI-003319	Cowboy	Cowboy Solar, LLC	CNSMRS	2	1800256	2/24/2018	completed	3/23/2018	completed	3/20/2018	QF18-828
36	MI-002689	Dantes	Dantes Solar, LLC	CNSMRS	2	1700332	9/15/2017	completed	3/23/2018	completed	3/9/2018	QF18-715
37	MI-002358	Demings Lake	Demings Lake Solar, LLC	CNSMRS	2	1700627	8/25/2017	completed	3/23/2018	completed	3/20/2018	QF18-829
38	MI-002199	Devils Lake	Devils Lake Solar, LLC	CNSMRS	2	1700197	8/22/2017	completed	3/23/2018	completed	3/20/2018	QF18-830
39	MI-003178	Domingo	Domingo Solar, LLC	CNSMRS	2	1800090	1/18/2018	completed	3/23/2018	completed	3/20/2018	QF18-832
40	MI-003314	Donny	Donny Solar, LLC	CNSMRS	2	1800269	2/27/2018	completed	3/23/2018	completed	3/20/2018	QF18-833
41	MI-002954	Douglass	Douglass Solar, LLC	CNSMRS	2	1700581	11/29/2017	completed	3/23/2018	completed	3/20/2018	QF18-834
42	MI-002431	Duffield	Duffield Solar, LLC	CNSMRS	2	1700198	8/25/2017	completed	3/23/2018	completed	3/20/2018	QF18-835
43	MI-002727	Endymion	Endymion Solar, LLC	CNSMRS	2	1700331	9/15/2017	completed	3/23/2018	completed	3/20/2018	QF18-836
44	MI-003292	Esmarelda	Esmarelda Solar, LLC	CNSMRS	12	1801379 - Res	10/16/2018	completed	3/23/2018	completed	3/20/2018	QF18-837
45	MI-003293	Fabienne	Fabienne Solar, LLC	CNSMRS	2	1800184	2/9/2018	completed	3/23/2018	completed	3/20/2018	QF18-838
46	MI-003207	Fillmore	Fillmore Solar, LLC	CNSMRS	12	181391	10/16/2018	completed	3/23/2018	completed	3/20/2018	QF18-839
47	MI-003237	Frehley	Frehley Solar, LLC	CNSMRS	2	1800135	1/26/2018	completed	3/23/2018	completed	3/20/2018	QF18-842
48	MI-002160	Frontier	Frontier Solar, LLC	CNSMRS	2	1700200	8/22/2017	completed	3/23/2018	completed	3/20/2018	QF18-843
49	MI-002992	Frontier's Edge	Frontier's Edge Solar, LLC	CNSMRS	20	1800185	2/9/2018	completed	3/23/2018	completed	3/9/2018	QF18-716
50	MI-002480	Geddes 1	Geddes 1 Solar, LLC	CNSMRS	2	1700229	8/25/2017	completed	3/23/2018	completed	3/9/2018	QF18-717
51	MI-002156	Geddes 2	Geddes 2 Solar, LLC	CNSMRS	2	1700201	8/22/2017	completed	3/23/2018	completed	3/9/2018	QF18-718
52	MI-002360	Gola	Gola Solar, LLC	CNSMRS	2	1700165	9/5/2017	completed	3/23/2018	completed	3/20/2018	QF18-845
53	MI-002348	Gorman	Gorman Solar, LLC	CNSMRS	2	1700166	9/5/2017	completed	3/23/2018	completed	3/20/2018	QF18-846
54	MI-002664	Greasy Jim	Greasy Jim Solar, LLC	CNSMRS	2	1700330	9/15/2017	completed	3/23/2018	completed	3/9/2018	QF18-719
55	MI-003233	Grimke	Grimke Solar, LLC	CNSMRS	2	1800136	1/26/2018	completed	3/23/2018	completed	3/20/2018	QF18-847
56	MI-003090	Groucho	Groucho Solar, LLC	CNSMRS	2	1700526	11/14/2017	completed	3/23/2018	completed	3/9/2018	QF18-720
57	MI-003220	Grover	Grover Solar, LLC	CNSMRS	2	1800092	1/18/2018	completed	3/23/2018	completed	3/20/2018	QF18-848
58	MI-003067	Hatchet	Hatchet Solar, LLC	CNSMRS	2	1700623	12/8/2017	completed	3/23/2018	completed	3/20/2018	QF18-849
59	MI-002362	Hazel	Hazel Solar, LLC	CNSMRS	2	1700167	9/5/2017	completed	3/23/2018	completed	3/20/2018	QF18-850
60	MI-002422	Hendershot	Hendershot Solar, LLC	CNSMRS	2	1700168	9/5/2017	completed	3/23/2018	completed	3/9/2018	QF18-722
61	MI-002953	Hermosa	Hermosa Solar, LLC	CNSMRS	5	1801247	10/23/2018	completed	3/23/2018	completed	3/20/2018	QF18-858
62	MI-002165	Herring	Herring Solar, LLC	CNSMRS	2	1700202	8/22/2017	completed	3/23/2018	completed	3/20/2018	QF18-860
63	MI-002477	Honey 1	Honey 1 Solar, LLC	CNSMRS	2	1700230	8/25/2017	completed	3/23/2018	completed	3/20/2018	QF18-861
64	MI-002179	Horton	Horton Solar, LLC	CNSMRS	2	1700169	9/5/2017	completed	3/23/2018	completed	3/20/2018	QF18-862
65	MI-002711	Hyperion	Hyperion Solar, LLC	CNSMRS	2	1700329	9/15/2017	completed	3/23/2018	completed	3/9/2018	QF18-723
66	MI-003236	Imaeda	Imaeda Solar, LLC	CNSMRS	2	1800137	1/26/2018	completed	3/23/2018	completed	3/20/2018	QF18-863

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67	MI-002981	Incandenza	Incandenza Solar, LLC	CNSMRS	2	1700530	11/14/2017	completed	3/23/2018	completed	3/20/2018	QF18-864
68	MI-002432	Interchange	Interchange Solar, LLC	CNSMRS	2	1700203	8/22/2017	completed	3/23/2018	completed	3/12/2018	QF18-743
69	MI-003264	Iron	Iron Solar, LLC	CNSMRS	20	18385	10/16/2018	completed	3/23/2018	completed	3/20/2018	QF18-865
70	MI-002147	Jack Francis	Jack Francis Solar, LLC	CNSMRS	2	1700170	9/5/2017	completed	3/23/2018	completed	3/12/2018	QF18-744
71	MI-003312	Jeffery	Jeffery Solar, LLC	CNSMRS	2	1800186	2/9/2018	completed	3/23/2018	completed	3/20/2018	QF18-866
72	MI-003085	Jellyfish	Jellyfish Solar, LLC	CNSMRS	2	1700580	11/29/2017	completed	3/23/2018	completed	3/20/2018	QF18-867
73	MI-003299	Jimmie	Jimmie Solar, LLC	CNSMRS	2	1800187	2/9/2018	completed	3/23/2018	completed	3/20/2018	QF18-868
74	MI-003295	Jody	Jody Solar, LLC	CNSMRS	2	1800281	3/1/2018	completed	3/23/2018	completed	3/20/2018	QF18-869
75	MI-002762	Kaline	Kaline Solar, LLC	CNSMRS	2	1700383	9/30/2017	completed	3/23/2018	completed	3/20/2018	QF18-870
76	MI-003298	Keitel	Keitel Solar, LLC	CNSMRS	2	1800188	2/9/2018	completed	3/23/2018	completed	3/20/2018	QF18-871
77	MI-003136	Kennan	Kennan Solar, LLC	CNSMRS	2	1700624	12/8/2017	completed	3/23/2018	completed	3/20/2018	QF18-872
78	MI-002159	Khonsu	Khonsu Solar, LLC	CNSMRS	2	1700204	8/22/2017	completed	3/23/2018	completed	3/12/2018	QF18-745
79	MI-002692	Kinbote	Kinbote Solar, LLC	CNSMRS	2	1700328	9/15/2017	completed	3/23/2018	completed	3/12/2018	QF18-746
80	MI-002959	Knockhill	Knockhill Solar, LLC	CNSMRS	2	1700582	11/29/2017	completed	3/23/2018	completed	3/20/2018	QF18-874
81	MI-002368	Knowlton	Knowlton Solar, LLC	CNSMRS	2	1700231	8/22/2017	completed	3/23/2018	completed	3/20/2018	QF18-875
82	MI-003162	Kochville	Kochville Solar, LLC	CNSMRS	2	1700663	12/22/2017	completed	3/23/2018	completed	3/20/2018	QF18-876
83	MI-003128	Kofi	Kofi Solar, LLC	CNSMRS	2	1700644	12/16/2017	completed	3/23/2018	completed	3/20/2018	QF18-877
84	MI-003068	Kubrick	Kubrick Solar, LLC	CNSMRS	20	1700625	12/8/2017	completed	3/23/2018	completed	3/12/2018	QF18-747
85	MI-002434	Litchfield	Litchfield Solar, LLC	CNSMRS	2	1700205	8/22/2017	completed	3/23/2018	completed	3/20/2018	QF18-879
86	MI-002667	Littlefield	Littlefield Solar, LLC	CNSMRS	2	1700327	9/15/2017	completed	3/23/2018	completed	3/12/2018	QF18-748
87	MI-003146	Macbeth	Macbeth Solar, LLC	CNSMRS	20	1800065	1/12/2018	completed	3/23/2018	completed	3/12/2018	QF18-749
88	MI-003165	Mako	Mako Solar, LLC	CNSMRS	2	1700664	12/22/2017	completed	3/23/2018	completed	3/20/2018	QF18-880
89	MI-003370	Malbec	Malbec Solar, LLC	CNSMRS	20	1800277	3/1/2018	completed	3/23/2018	completed	3/12/2018	QF18-750
90	MI-003320	Marty	Marty Solar, LLC	CNSMRS	2	1800190	2/9/2018	completed	3/23/2018	completed	3/20/2018	QF18-881
91	MI-002143	May Shannon	May Shannon Solar, LLC	CNSMRS	2	1700171	8/22/2017	completed	3/23/2018	completed	3/12/2018	QF18-751
92	MI-003211	McKinley	McKinley Solar, LLC	CNSMRS	2	1800223	2/16/2018	completed	3/23/2018	completed	3/20/2018	QF18-882
93	MI-002714	Menelaus	Menelaus Solar, LLC	CNSMRS	2	1700326	9/15/2017	completed	3/23/2018	completed	3/20/2018	QF18-883
94	MI-003289	Mia	Mia Solar, LLC	CNSMRS	15	1800191	2/9/2018	completed	3/23/2018	completed	3/12/2018	QF18-752
95	MI-002760	Minos	Minos Solar, LLC	CNSMRS	2	1700390	9/30/2017	completed	3/23/2018	completed	3/20/2018	QF18-884
96	MI-003195	Mir	Mir Solar, LLC	CNSMRS	2	1800140	1/26/2018	completed	3/23/2018	completed	3/20/2018	QF18-885
97	MI-002756	Misteguay	Misteguay Solar, LLC	CNSMRS	2	1700389	9/30/2017	completed	3/23/2018	completed	3/20/2018	QF18-887
98	MI-002712	Morse	Morse Solar, LLC	CNSMRS	2	1700325	9/15/2017	completed	3/23/2018	completed	3/12/2018	QF18-753
99	MI-002478	Oberlin	Oberlin Solar, LLC	CNSMRS	2	1700232	8/25/2017	completed	3/23/2018	completed	3/12/2018	QF18-754

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100	MI-003062	Olivier	Olivier Solar, LLC	CNSMRS	20	1800192	2/9/2018	completed	3/23/2018	completed	3/12/2018	QF18-755
101	MI-002195	Onsted	Onsted Solar, LLC	CNSMRS	2	1700207	8/22/2017	completed	3/23/2018	completed	3/20/2018	QF18-889
102	MI-003060	Otisville	Otisville Solar, LLC	CNSMRS	2	1700579	11/29/2017	completed	3/23/2018	completed	3/20/2018	QF18-890
103	MI-002730	Pannonica	Pannonica Solar, LLC	CNSMRS	2	1700324	9/15/2017	completed	3/23/2018	completed	3/12/2018	QF18-756
104	MI-003130	Patron	Patron Solar, LLC	CNSMRS	2	1800066	1/12/2018	completed	3/23/2018	completed	3/20/2018	QF18-892
105	MI-003180	Pazar	Pazar Solar, LLC	CNSMRS	2	1700665	12/22/2017	completed	3/23/2018	completed	3/20/2018	QF18-893
106	MI-002482	Peppers	Peppers Solar, LLC	CNSMRS	2	1700239	8/22/2017	completed	3/23/2018	completed	3/20/2018	QF18-894
107	MI-002957	Petty	Petty Solar, LLC	CNSMRS	2	1700583	11/29/2017	completed	3/23/2018	completed	3/20/2018	QF18-895
108	MI-003198	Rambling Man	Rambling Man Solar, LLC	CNSMRS	2	1800224	2/16/2018	completed	3/23/2018	completed	3/20/2018	QF18-898
109	MI-002168	Reading	Reading Solar, LLC	CNSMRS	20	1700209	7/26/2017	completed	3/23/2018	completed	3/12/2018	QF18-757
110	MI-002662	Roethke	Roethke Solar, LLC	CNSMRS	2	1700322	9/15/2017	completed	3/23/2018	completed	3/12/2018	QF18-758
111	MI-002991	Rothko	Rothko Solar, LLC	CNSMRS	12	181384	10/16/2018	completed	3/23/2018	completed	3/20/2018	QF18-890
112	MI-002958	Ruth	Ruth Solar, LLC	CNSMRS	2	1700528	12/5/2017	completed	3/23/2018	completed	3/20/2018	QF18-901
113	MI-002436	Salt Lake	Salt Lake Solar, LLC	CNSMRS	2	1700233	8/25/2017	completed	3/23/2018	completed	3/12/2018	QF18-759
114	MI-002755	Saltine	Saltine Solar, LLC	CNSMRS	2	1700381	9/30/2017	completed	3/23/2018	completed	3/20/2018	QF18-902
115	MI-002956	Seger	Seger Solar, LLC	CNSMRS	2	1700584	11/29/2017	completed	3/23/2018	completed	3/20/2018	QF18-903
116	MI-002241	Sharpe	Sharpe Solar, LLC	CNSMRS	2	1700211	8/22/2017	completed	3/23/2018	completed	3/20/2018	QF18-904
117	MI-003202	Sinbad	Sinbad Solar, LLC	CNSMRS	2	1800094	1/18/2018	completed	3/23/2018	completed	3/20/2018	QF18-905
118	MI-002350	Slee	Slee Solar, LLC	CNSMRS	2	1700212	8/22/2017	completed	3/23/2018	completed	3/20/2018	QF18-906
119	MI-003179	Solis	Solis Solar, LLC	CNSMRS	2	1700666	12/22/2017	completed	3/23/2018	completed	3/20/2018	QF18-907
120	MI-002153	Southside	Southside Solar, LLC	CNSMRS	2	1700173	9/5/2017	completed	3/23/2018	completed	3/12/2018	QF18-760
121	MI-002131	St. Joseph	St. Joseph Solar, LLC	CNSMRS	2	1700174	9/5/2017	completed	3/23/2018	completed	3/20/2018	QF18-909
122	MI-002481	Stoneheart	Stoneheart Solar, LLC	CNSMRS	2	1700235	8/22/2017	completed	3/23/2018	completed	3/12/2018	QF18-761
123	MI-002754	Swan Creek	Swan Creek Solar, LLC	CNSMRS	2	1700380	9/30/2017	completed	3/23/2018	completed	3/12/2018	QF18-762
124	MI-003229	Taft	Taft Solar, LLC	CNSMRS	2	1800225	2/16/2018	completed	3/23/2018	completed	3/20/2018	QF18-911
125	MI-002960	Thumper	Thumper Solar, LLC	CNSMRS	2	1700585	11/29/2017	completed	3/23/2018	completed	3/20/2018	QF18-912
126	MI-002955	Tieman	Tieman Solar, LLC	CNSMRS	2	1700586	11/29/2017	completed	3/23/2018	completed	3/20/2018	QF18-913
127	MI-002136	Tittabawassee	Tittabawassee Solar, LLC	CNSMRS	2	1700175	8/25/2017	completed	3/23/2018	completed	3/12/2018	QF18-763
128	MI-002764	Trammell	Trammell Solar, LLC	CNSMRS	2	1700402	10/9/2017	completed	3/23/2018	completed	3/20/2018	QF18-914
129	MI-003234	Treasure	Treasure Solar, LLC	CNSMRS	2	1800226	2/16/2018	completed	3/23/2018	completed	3/20/2018	QF18-915
130	MI-002994	Turtle	Turtle Solar, LLC	CNSMRS	20	1700588	11/29/2017	completed	3/23/2018	completed	3/12/2018	QF18-764
131	MI-003281	Twining	Twining Solar, LLC	CNSMRS	2	1800227	2/16/2018	completed	3/23/2018	completed	3/20/2018	QF18-917
132	MI-002713	Typhon	Typhon Solar, LLC	CNSMRS	2	1700321	9/15/2017	completed	3/23/2018	completed	3/20/2018	QF18-918

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133	MI-003321	Uli	Uli Solar, LLC	CNSMRS	2	1800193	2/9/2018	completed	3/23/2018	completed	3/20/2018	QF18-919
134	MI-003205	Van Buren	Van Buren Solar, LLC	CNSMRS	12	181387	10/16/2018	completed	3/23/2018	completed	3/20/2018	QF18-921
135	MI-002370	Victors	Victors Solar, LLC	CNSMRS	2	1700236	8/22/2017	completed	3/23/2018	completed	3/20/2018	QF18-922
136	MI-002758	Whittum	Whittum Solar, LLC	CNSMRS	2	1700403	11/7/2017	completed	3/23/2018	completed	3/12/2018	QF18-765
137	MI-002192	Wilmore	Wilmore Solar, LLC	CNSMRS	2	1700237	8/25/2017	completed	3/23/2018	completed	3/20/2018	QF18-925
138	MI-002483	Woodley	Woodley Solar, LLC	CNSMRS	2	1700238	8/22/2017	completed	3/23/2018	completed	3/20/2018	QF18-926
139	MI-003225	Woodrow	Woodrow Solar, LLC	CNSMRS	10	1800229	11/2/2018	completed	3/23/2018	completed	3/20/2018	QF18-927
140	MI-003134	Zadie	Zadie Solar, LLC	CNSMRS	2	1700627	12/8/2017	completed	3/23/2018	completed	3/20/2018	QF18-928
141	MI-003297	Zed	Zed Solar, LLC	CNSMRS	2	1800282	3/1/2018	completed	3/23/2018	completed	3/20/2018	QF18-929
142	MI-002715	Zeno	Zeno Solar, LLC	CNSMRS	2	1700323	9/15/2017	completed	3/23/2018	completed	3/12/2018	QF18-766
143	MI-003462	Abhurite	Abhurite Solar, LLC	CNSMRS	2	1800677	5/10/2018	completed	8/23/2018	completed	5/7/2018	QF18-1190
144	MI-003420	Addle	Addle Solar, LLC	CNSMRS	20	1800532	4/12/2018	completed	8/23/2018	completed	4/27/2018	QF18-1139
145	MI-003463	Agrelite	Agrelite Solar, LLC	CNSMRS	20	1800704	5/15/2018	completed	8/23/2018	completed	5/7/2018	QF18-1191
146	MI-003632	Albion North	Albion North Solar, LLC	CNSMRS	10	1800823	8/22/2018	completed	8/23/2018	completed	8/16/2018	QF18-1783
147	MI-003629	Alpinist	Alpinist Solar, LLC	CNSMRS	10	1800846	6/14/2018	completed	8/23/2018	completed	8/16/2018	QF18-1784
148	MI-003366	Arb	Arb Solar, LLC	CNSMRS	20	1800442	3/22/2018	completed	8/23/2018	completed	4/27/2018	QF18-1140
149	MI-003424	Arctite	Arctite Solar, LLC	CNSMRS	2	1800339	3/12/2018	completed	8/23/2018	completed	4/27/2018	QF18-1141
150	MI-003572	Artisan	Artisan Solar, LLC	CNSMRS	10	1800738	5/24/2018	completed	8/23/2018	completed	8/16/2018	QF18-1785
151	MI-003385	Au Gres	Au Gres Solar, LLC	CNSMRS	2	1800340	3/12/2018	completed	8/23/2018	completed	4/27/2018	QF18-1142
152	MI-003578	Bamboo	Bamboo Solar, LLC	CNSMRS	10	1800739	5/24/2018	completed	8/23/2018	completed	8/16/2018	QF18-1786
153	MI-003622	Bellburns	Bellburns Solar, LLC	CNSMRS	20	1800737	5/24/2018	completed	8/23/2018	completed	8/16/2018	QF18-1787
154	MI-003620	Big Prairie	Big Prairie Solar, LLC	CNSMRS	20	1800884	6/22/2018	completed	8/23/2018	completed	8/16/2018	QF18-1788
155	MI-003581	Bluebird	Bluebird Solar, LLC	CNSMRS	2	1800820	6/9/2018	completed	8/23/2018	completed	8/16/2018	QF18-1789
156	MI-003764	Bodega	Bodega Solar, LLC	CNSMRS	10	1800966	7/17/2018	completed	8/23/2018	completed	8/17/2018	QF18-1817
157	MI-003627	Bohne	Bohne Solar, LLC	CNSMRS	2	1800732	5/24/2018	completed	8/23/2018	completed	8/16/2018	QF18-1790
158	MI-003621	Breckenridge	Breckenridge Solar, LLC	CNSMRS	2	1800932	7/7/2018	completed	8/23/2018	completed	8/16/2018	QF18-1791
159	MI-003658	Byrne	Byrne Solar, LLC	CNSMRS	5	1800821	6/9/2018	completed	8/23/2018	completed	8/16/2018	QF18-1792
160	MI-003579	Congo	Congo Solar, LLC	CNSMRS	10	1800740	5/24/2018	completed	8/23/2018	completed	8/16/2018	QF18-1793
161	MI-003641	Dram	Dram Solar, LLC	CNSMRS	5	1800848	6/14/2018	completed	8/23/2018	completed	8/16/2018	QF18-1794
162	MI-003371	El Ray	El Ray Solar, LLC	CNSMRS	2	18341 - Incorr	3/12/2018	completed	8/23/2018	completed	4/27/2018	QF18-1144
163	MI-003470	Elsie	Elsie Solar, LLC	CNSMRS	2	1800883	6/22/2018	completed	8/23/2018	completed	8/16/2018	QF18-1795
164	MI-003662	Famous Rays	Famous Rays Solar, LLC	CNSMRS	5	18949 - Incorr	7/13/2018	completed	8/23/2018	completed	8/16/2018	QF18-1796
165	MI-003397	Ferris	Ferris Solar, LLC	CNSMRS	2	1800407	3/20/2018	completed	8/23/2018	completed	4/27/2018	QF18-1145

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166	MI-003230	Fortunate Sun	Fortunate Sun Solar, LLC	CNSMRS	20	1800824	6/9/2018	completed	8/23/2018	completed	8/16/2018	QF18-1797
167	MI-003374	Fulton	Fulton Solar, LLC	CNSMRS	2	1800408	3/20/2018	completed	8/23/2018	completed	4/27/2018	QF18-1146
168	MI-003416	Gladwin	Gladwin Solar, LLC	CNSMRS	2	1800409	3/20/2018	completed	8/23/2018	completed	4/27/2018	QF18-1147
169	MI-003419	Glennie	Glennie Solar, LLC	CNSMRS	20	1800736	5/24/2018	completed	8/23/2018	completed	8/16/2018	QF18-1802
170	MI-003594	Gobi	Gobi Solar, LLC	CNSMRS	20	1800797	6/5/2018	completed	8/23/2018	completed	5/7/2018	QF18-1192
171	MI-003590	Goldfinch	Goldfinch Solar, LLC	CNSMRS	2	1800678	5/10/2018	completed	8/23/2018	completed	5/7/2018	QF18-1193
172	MI-003575	Granite	Granite Solar, LLC	CNSMRS	2	1800608	4/27/2018	completed	8/23/2018	completed	5/7/2018	QF18-1194
173	MI-003469	Gull Lake	Gull Lake Solar, LLC	CNSMRS	2	1800679	5/10/2018	completed	8/23/2018	completed	5/7/2018	QF18-1195
174	MI-003396	Hanging Gardens	Hanging Gardens Solar, LLC	CNSMRS	5	1800531	4/12/2018	completed	8/23/2018	completed	4/27/2018	QF18-1148
175	MI-003636	Hogan	Hogan Solar, LLC	CNSMRS	12	1801380	10/16/2018	completed	8/23/2018	completed	8/16/2018	QF18-1803
176	MI-003465	Ignatius	Ignatius Solar, LLC	CNSMRS	20	1800705	5/15/2018	completed	8/23/2018	completed	5/7/2018	QF18-1196
177	MI-003677	Ikeya	Ikeya Solar, LLC	CNSMRS	2	1800899	6/30/2018	completed	8/23/2018	completed	8/16/2018	QF18-1804
178	MI-003318	Jackie	Jackie Solar, LLC	CNSMRS	2	18453 - Incorr	3/28/2018	completed	8/23/2018	completed	4/27/2018	QF18-1149
179	MI-003651	Jacks Lake	Jacks Lake Solar, LLC	CNSMRS	5	1800849	6/14/2018	completed	8/23/2018	completed	8/16/2018	QF18-1805
180	MI-002668	Kellen	Kellen Solar, LLC	CNSMRS	2	1800530	4/12/2018	completed	8/23/2018	completed	4/27/2018	QF18-1150
181	MI-003137	Kissinger	Kissinger Solar, LLC	CNSMRS	2	1800454	3/28/2018	completed	8/23/2018	completed	4/27/2018	QF18-1151
182	MI-003580	Lightfoot	Lightfoot Solar, LLC	CNSMRS	10	1800741	5/24/2018	completed	8/23/2018	completed	8/16/2018	QF18-1806
183	MI-003373	Lighthouse	Lighthouse Solar, LLC	CNSMRS	2	1800342	3/12/2018	completed	8/23/2018	completed	4/27/2018	QF18-1152
184	MI-003427	Lineman	Lineman Solar, LLC	CNSMRS	2	1800510	4/6/2018	completed	8/23/2018	completed	4/27/2018	QF18-1154
185	MI-003409	Malibu	Malibu Solar, LLC	CNSMRS	20	1800652	3/12/2018	completed	8/23/2018	completed	4/27/2018	QF18-1155
186	MI-003315	Maude	Maude Solar, LLC	CNSMRS	2	1800343	3/12/2018	completed	8/23/2018	completed	4/27/2018	QF18-1156
187	MI-003395	Miracle Max	Miracle Max Solar, LLC	CNSMRS	2	1800344	3/12/2018	completed	8/23/2018	completed	4/27/2018	QF18-1157
188	MI-003765	Moonbeam	Moonbeam Solar, LLC	CNSMRS	10	1800967	8/23/2018	completed	8/23/2018	completed	8/17/2018	QF18-1818
189	MI-003467	Mumbai	Mumbai Solar, LLC	CNSMRS	2	1800649	5/4/2018	completed	8/23/2018	completed	5/7/2018	QF18-1200
190	MI-003441	Numatism	Numatism Solar, LLC	CNSMRS	10	1800847	6/14/2018	completed	8/23/2018	completed	8/16/2018	QF18-1808
191	MI-003650	Oak Grove	Oak Grove Solar, LLC	CNSMRS	5	1800898	6/30/2018	completed	8/23/2018	completed	8/16/2018	QF18-1809
192	MI-003661	Ovid	Ovid Solar, LLC	CNSMRS	10	1800897	6/30/2018	completed	8/23/2018	completed	8/16/2018	QF18-1810
193	MI-003750	Prairie Creek	Prairie Creek Solar, LLC	CNSMRS	2	1800900	6/30/2018	completed	8/23/2018	completed	8/16/2018	QF18-1811
194	MI-003729	Prometheus	Prometheus Solar, LLC	CNSMRS	20	1800968	7/17/2018	completed	8/23/2018	completed	8/17/2018	QF18-1819
195	MI-003648	Sand Creek	Sand Creek Solar, LLC	CNSMRS	2	1800901	6/30/2018	completed	8/23/2018	completed	8/16/2018	QF18-1812
196	MI-003574	Shanti	Shanti Solar, LLC	CNSMRS	2	1800609	4/27/2018	completed	8/23/2018	completed	5/7/2018	QF18-1197
197	MI-003425	Sticks	Sticks Solar, LLC	CNSMRS	2	1800346	3/12/2018	completed	8/23/2018	completed	4/27/2018	QF18-1158
198	MI-003428	Sunny Acres	Sunny Acres Solar, LLC	CNSMRS	2	1800511	4/6/2018	completed	8/23/2018	completed	4/27/2018	QF18-1160

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199	MI-003675	Sunskrit	Sunskrit Solar, LLC	CNSMRS	5	1800950	7/13/2018	completed	8/23/2018	completed	8/17/2018	QF18-1813
200	MI-003649	Surbrook	Surbrook Solar, LLC	CNSMRS	10	1800882	6/22/2018	completed	8/23/2018	completed	8/17/2018	QF18-1814
201	MI-003638	Swartz	Swartz Solar, LLC	CNSMRS	12	181390	10/16/2018	completed	8/23/2018	completed	8/17/2018	QF18-1815
202	MI-003426	Tangiers	Tangiers Solar, LLC	CNSMRS	10	1800533	4/12/2018	completed	8/23/2018	completed	4/27/2018	QF18-1161
203	MI-003655	Teppei	Teppei Solar, LLC	CNSMRS	10	1800822	6/9/2018	completed	8/23/2018	completed	8/17/2018	QF18-1816
204	MI-003401	Thornapple	Thornapple Solar, LLC	CNSMRS	2	1800347	3/12/2018	completed	8/23/2018	completed	4/27/2018	QF18-1162
205	MI-003375	Union City	Union City Solar, LLC	CNSMRS	10	1800534	4/12/2018	completed	8/23/2018	completed	4/27/2018	QF18-1164
206	MI-003287	Vincent	Vincent Solar, LLC	CNSMRS	2	1800455	3/28/2018	completed	8/23/2018	completed	4/27/2018	QF18-1165
207	MI-003423	Adamite	Adamite Solar, LLC	CNSMRS	20	181468	10/27/2018	completed	1/16/2019	completed	4/27/2018	QF18-1138
208	MI-003850	Atom	Atom Solar, LLC	CNSMRS	20	1801247	9/22/2018	completed	1/16/2019	completed	12/4/2018	QF19-521
209	MI-003856	Babbitt	Babbitt Solar, LLC	CNSMRS	16	1801589	11/16/2018	completed	1/16/2019	completed	12/4/2018	QF19-522
210	MI-003678	Borelly	Borelly Solar, LLC	CNSMRS	20	1801021	7/27/2018	completed	1/16/2019	completed	12/4/2018	QF19-523
211	MI-003858	Bradshaw	Bradshaw Solar, LLC	CNSMRS	10	1801745	12/27/2018	completed	1/16/2019	completed	12/6/2018	QF19-524
212	MI-003201	Capetown	Capetown Solar, LLC	CNSMRS	12	1801453	10/25/2018	completed	1/16/2019	completed	3/20/2018	QF18-824
213	MI-003847	Cloudbreak	Cloudbreak Solar, LLC	CNSMRS	20	1801271	9/25/2018	completed	1/16/2019	completed	12/6/2018	QF19-525
214	MI-003898	Coronado	Coronado Solar, LLC	CNSMRS	14	1801599	11/20/2018	completed	1/16/2019	completed	12/6/2018	QF19-526
215	MI-003169	Dimanche	Dimanche Solar, LLC	CNSMRS	12	1801376 - Res	10/15/2018	completed	1/16/2019	completed	3/20/2018	QF18-831
216	MI-003415	Durban	Durban Solar, LLC	CNSMRS	12	CE1801375 - F	10/15/2018	completed	1/16/2019	completed	4/27/2018	QF18-1143
217	MI-003142	Goethe	Goethe Solar, LLC	CNSMRS	20	CE1801374 - I	10/15/2018	completed	1/16/2019	completed	3/20/2018	QF18-844
218	MI-003843	Johnsfield	Johnsfield Solar, LLC	CNSMRS	10	1801211	9/11/2018	completed	1/16/2019	completed	12/6/2018	QF19-527
219	MI-003886	Jolly Green	Jolly Green Solar, LLC	CNSMRS	20	1801709	12/6/2018	completed	1/16/2019	completed	12/6/2018	QF19-528
220	MI-003676	Jordanelle	Jordanelle Solar, LLC	CNSMRS	20	1800986	7/20/2018	completed	1/16/2019	completed	12/6/2018	QF19-529
221	MI-003801	Laughing Whitefish	Laughing Whitefish Solar,	CNSMRS	10	1801212	9/11/2018	completed	1/16/2019	completed	12/6/2018	QF19-530
222	MI-003626	Long Lake	Long Lake Solar, LLC	CNSMRS	20	1801451	10/25/2018	completed	1/16/2019	completed	8/16/2018	QF18-1807
223	MI-004013	Mitten	Mitten Solar, LLC	CNSMRS	20	1900011	1/3/2019	completed	1/16/2019	completed	1/16/2019	QF19-695
224	MI-003864	Odawa	Odawa Solar, LLC	CNSMRS	20	1801597	11/20/2018	completed	1/16/2019	completed	12/6/2018	QF19-531
225	MI-003206	Polk	Polk Solar, LLC	CNSMRS	12	181388	10/16/2018	completed	1/16/2019	completed	3/20/2018	QF18-896
226	MI-003145	Puck	Puck Solar, LLC	CNSMRS	20	1801510	11/3/2018	completed	1/16/2019	completed	3/20/2018	QF18-897
227	MI-003814	Rosco	Rosco Solar, LLC	CNSMRS	10	1801657	11/28/2018	completed	1/16/2019	completed	12/6/2018	QF19-532
228	MI-003852	Shipsterns	Shipsterns Solar, LLC	CNSMRS	20	1800705	9/22/2018	completed	1/16/2019	completed	12/6/2018	QF19-533
229	MI-003439	Snare	Snare Solar, LLC	CNSMRS	10	1801746	12/27/2018	completed	1/16/2019	completed	12/6/2018	QF19-534
230	MI-003208	Stockholm	Stockholm Solar, LLC	CNSMRS	10	1801590	11/16/2018	completed	1/16/2019	completed	5/21/2018	QF18-1415
231	MI-003680	Stubbs	Stubbs Solar, LLC	CNSMRS	10	1801020	7/27/2018	completed	1/16/2019	completed	12/6/2018	QF19-536

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232	MI-003135	Sunbelievable	Sunbelievable Solar, LLC	CNSMRS	12	181389	10/16/2018	completed	1/16/2019	completed	4/27/2018	QF18-1159
233	MI-003761	Thayne	Thayne Solar, LLC	CNSMRS	10	1800985	7/20/2018	completed	1/16/2019	completed	12/6/2018	QF19-537
234	MI-003846	Topanga	Topanga Solar, LLC	CNSMRS	20	1801272	9/25/2018	completed	1/16/2019	completed	12/6/2018	QF19-538
235	MI-003740	Tortuga	Tortuga Solar, LLC	CNSMRS	20	1801223	9/15/2018	completed	1/16/2019	completed	12/6/2018	QF19-539
236	MI-002952	Twin Lake	Twin Lake Solar, LLC	CNSMRS	20	1801452	10/25/2018	completed	1/16/2019	completed	3/20/2018	QF18-916
237	MI-003218	Ulysses	Ulysses Solar, LLC	CNSMRS	10	1801249	9/22/2018	completed	1/16/2019	completed	3/20/2018	QF18-920
238	MI-002173	Waldron	Waldron Solar, LLC	CNSMRS	20	1801382	10/16/2018	completed	1/16/2019	completed	3/20/2018	QF18-923
239	MI-003028	West Hyperion	West Hyperion Solar, LLC	CNSMRS	20	1801496	10/24/2018	completed	1/16/2019	completed	3/20/2018	QF18-924
240	MI-003795	Willford	Willford Solar, LLC	CNSMRS	20	1801213	9/11/2018	completed	1/16/2019	completed	12/6/2018	QF19-540
241	MI-003730	Zermatt	Zermatt Solar, LLC	CNSMRS	20	1801273	9/25/2018	completed	1/16/2019	completed	12/6/2018	QF19-541
242	MI-004098	Asparagus	Asparagus Solar, LLC	CNSMRS	20		3/19/2019	completed	4/1/2019	completed	3/29/2019	QF19-1016
243	MI-004074	Banfield	Banfield Solar, LLC	CNSMRS	20		3/4/2019	completed	4/1/2019	completed	3/29/2019	QF19-1017
244	MI-004064	Beaverton	Beaverton Solar, LLC	CNSMRS	20		3/19/2019	completed	4/1/2019	completed	3/29/2019	QF19-1018
245	MI-004061	Big Stone	Big Stone Solar, LLC	CNSMRS	12		2/22/2019	completed	4/1/2019	completed	3/29/2019	QF19-1019
246	MI-004050	Castleton	Castleton Solar, LLC	CNSMRS	20		3/4/2019	completed	4/1/2019	completed	3/29/2019	QF19-1020
247	MI-004062	Custer	Custer Solar, LLC	CNSMRS	12		2/22/2019	completed	4/1/2019	completed	3/29/2019	QF19-1021
248	MI-004097	Gordonville	Gordonville Solar, LLC	CNSMRS	20		3/19/2019	completed	4/1/2019	completed	3/29/2019	QF19-1022
249	MI-004030	Hubbard Lake	Hubbard Lake Solar, LLC	CNSMRS	12		2/22/2019	completed	4/1/2019	completed	3/29/2019	QF19-1023
250	MI-003310	Lebowski	Lebowski Solar, LLC	CNSMRS	20	1800189	2/9/2018	completed	4/1/2019	completed	3/20/2018	QF18-878
251	MI-004012	Neutron	Neutron Solar, LLC	CNSMRS	20		3/4/2019	completed	4/1/2019	completed	3/29/2019	QF19-1024
252	MI-004051	Parma	Parma Solar, LLC	CNSMRS	14		3/4/2019	completed	4/1/2019	completed	4/1/2019	QF19-1025
253	MI-002239	Rosemary	Rosemary Solar, LLC	CNSMRS	20	1801710	12/19/2018	completed	4/1/2019	completed	5/17/2018	QF18-1380
254	MI-003793	Striker	Striker Solar, LLC	CNSMRS	5	1801250	9/22/2018	completed	4/1/2019	completed	12/6/2018	QF19-535
255	MI-004059	Swede	Swede Solar, LLC	CNSMRS	12		2/22/2019	completed	4/1/2019	completed	4/1/2019	QF19-1026
256	MI-004065	Woodlander	Woodlander Solar, LLC	CNSMRS	20		3/4/2019	completed	4/1/2019	completed	3/29/2019	QF19-1027

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