

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter of the application of)	
DTE ELECTRIC COMPANY for approval)	
of its integrated resource plan pursuant to)	Case No. U-21193
MCL 460.6t and for other relief.)	
_____)	

At the August 7, 2025 meeting of the Michigan Public Service Commission in Lansing,
Michigan.

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

ORDER

On March 17, 2025, the Midcontinent Independent System Operator, Inc. (MISO) filed a request with the Federal Energy Regulatory Commission (FERC) to revise MISO’s Open Access Transmission, Energy and Operating Reserve Markets Tariff (tariff), effective May 17, 2025. *See, Midcontinent Independent System Operator, Inc.*, FERC Docket No. ER25-1674-000, Revisions to the Open Access Transmission, Energy and Operating Reserve Tariff Expedited Resource Addition Study Filing (initial MISO filing).¹ MISO sought to amend its generator interconnection procedures (GIP) in order to establish the Expedited Resource Addition Study (ERAS) process. MISO asserted that the ERAS process will provide a framework for the accelerated study of generation projects that can address resource adequacy and reliability needs within the MISO

¹ The initial MISO filing can be viewed here: https://cdn.misoenergy.org/2025-03-17_Docket%20No.%20ER25-1674-000685943.pdf (accessed August 6, 2025).

footprint in the near term. Initial MISO filing, pp. 1-2. On May 16, 2025, FERC issued an order rejecting MISO's proposed ERAS process without prejudice in FERC Docket No. ER25-1674-000, finding that the initial MISO filing was not shown to be just and reasonable and not unduly discriminatory or preferential.² See, 191 FERC ¶ 61,131 (May 16, 2025).

On June 6, 2025, MISO filed an updated ERAS proposal with FERC in FERC Docket No. ER25-2454-000 (revised MISO filing).³ MISO requested an effective date of August 6, 2025, in order to have the tariff in place for the study cycle which commences September 2, 2025. On July 21, 2025, FERC approved MISO's revised filing in FERC Docket No. ER25-2454-000, with the condition that MISO make a compliance filing by August 20, 2025, reflecting revised tariff language previously submitted by MISO.⁴ *Order Accepting Tariff Revisions, Subject to Condition*, 192 FERC ¶ 61,064 (July 21, 2025) (July 21 FERC order). FERC approved the ERAS tariff effective August 6, 2025. July 21 FERC order, pp. 98, 135.

In order to enter the ERAS process, the interconnection customer must provide to MISO a determination from the relevant electric retail regulatory authority (RERRA) verifying that the application should be considered for the ERAS process (RERRA verification). Initial MISO filing, pp. 17-18, 37-38, 125-126, and Attachment X, GIP, 169.0.0; Revised MISO filing, pp. 3-4, and Tab A Redlines, Attachment X, Section 3.9.1. The RERRA is defined as "[a]n entity that has jurisdiction over and establishes prices and/or policies for providers of retail electric service to

² The order can be viewed here: https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20250516-3074 (accessed August 6, 2025).

³ The revised MISO filing can be viewed here: https://cdn.misoenergy.org/2025-06-06_Docket%20No.%20ER25-2454-000702742.pdf (accessed August 6, 2025).

⁴ The order can be viewed here: https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20250721-3077 (accessed August 6, 2025).

end-customers, such as the city council for a municipal utility, the governing board of a cooperative utility, the state public utility commission or any other such entity.” Initial MISO filing, pp. 1-2, n. 4; Revised MISO filing, p. 4, and Tab A Redlines, Attachment X, Section 3.9.1. Thus, the Commission serves as the RERRA for rate-regulated utilities, alternative electric suppliers, and their associated loads in Michigan.

In the June 12, 2025 order in Case No. U-21902 (June 12 order), the Commission adopted a temporary process for conducting the RERRA review and issuing the RERRA verification, and invited comment on the process. The Commission indicated that, should FERC approve MISO’s revised ERAS proposal, the Commission would adopt a final procedure in August 2025. June 12 order, p. 10.⁵

On August 4, 2025, DTE Electric Company (DTE Electric) filed an application for a RERRA verification in the instant docket pursuant to the June 12 order (application). In the application, DTE Electric seeks written verification that its Monroe Storage Project, Fermi Storage Project, and Au Gres Solar Park Project (together, the Projects) should be considered for inclusion in the MISO ERAS process. The company seeks a RERRA verification from the Commission Staff (Staff) pursuant to the June 12 order which states that, in defined circumstances, the Commission delegates the ability to approve requests for inclusion in ERAS to the Staff. June 12 order, p. 7.

DTE Electric states that, as an investor-owned utility (IOU) and load serving entity (LSE), it is subject to the tariff, including the amended GIP that established the ERAS process. Application, p. 2. DTE Electric explains MISO’s timeline for the first cycle of the ERAS process, noting that MISO begins accepting ERAS applications on August 6, 2025, and stops accepting ERAS applications for the first ERAS cycle on August 11, 2025. Application, pp. 2-3. The company

⁵ The Commission adopts a final procedure in the August 7, 2025 order in Case No. U-21902.

states that August 11-September 2, 2025, is the period within which MISO will notify applicants as to whether their applications are deficient, triggering the 10-day cure period, and that September 2, 2025, is the date of the beginning of the first ERAS cycle. DTE Electric states that MISO will accept up to 10 projects in this first ERAS quarterly cycle, and adds that:

because MISO is accepting ERAS applications on a “first-come, first-served” rolling basis, there is a high likelihood that the entire ERAS compendium of 68 projects saturates beyond this limit for all five quarterly cycles during the initial weeks after the effective date. As a point of reference, the recent PJM Reliability Resource Initiative, while separate and distinct, received 94 applications for 50 project slots in just ten business days.

Application, p. 3. DTE Electric requests a prompt review of its application by the Staff, and “is requesting the Commission’s RERRA verifications for each of the Projects by August 6, 2025 or sooner.” *Id.*, p. 8.

DTE Electric asserts that the Staff may issue the RERRA verifications because the Projects align with a Commission-approved integrated resource plan (IRP) and each is the “winning bidder” of a request for proposal (RFP) that was conducted according to the competitive bidding guidelines adopted by the Commission in the September 9, 2021 order in Case No. U-20802. Application, p. 4; *see also, id.*, pp. 4-8. The company notes that the July 26, 2023 order in the instant docket approved a settlement agreement in DTE Electric’s most recent IRP proceeding (July 26 order). DTE Electric avers that the Projects align with the IRP approved in the July 26 order and are each the winning bidder of an RFP, and thus should receive the RERRA verification in order to be considered for the first ERAS cycle on August 6, 2025. The application is accompanied by Exhibits 1-3, which consist of the “shortlisted RFP notification” for each of the Projects. Application, p. 8. DTE Electric states that it “is not seeking rate recovery in this filing” and that the RERRA verifications will not cause any alteration or amendment to the company’s

rates or rate schedules or increase the cost of service to any customer, and thus the application may be approved *ex parte* per MCL 460.6a(3). Application, p. 8.

DTE Electric states that the Monroe Storage Project will connect to “the substation being constructed in Monroe County and is anticipated to provide 350 MW [megawatts] of battery storage nameplate capacity.” *Id.*, p. 5. The company avers that the project supports the storage build plan approved in the July 26 order and also supports the statewide energy storage targets approved in Public Act 235 of 2023 (Act 235). DTE Electric states that it has “100% site control of the generator as well as the point of interconnection” and that this project has a commercial operation date (COD) of second quarter 2028. Application, p. 5. The company states that the Fermi Storage Project will also connect to the substation in Monroe County and will provide 200 MW of battery storage nameplate capacity, and likewise supports the IRP and the state’s energy storage targets. The company states that it has 100% site and interconnection point control and a COD of fourth quarter 2028 for this project. For the Au Gres Solar Park Project, DTE Electric states that it will connect to a substation being constructed in Arenac County, and will support the renewable build plan approved in the July 26 order with 175 MW of nameplate capacity.⁶ The company also states that it has 100% site and point of interconnection control and the project has a COD of third quarter 2028. *Id.*, p. 6. DTE Electric provides further detail on the competitive procurement process on pages 6-8 of the application.

The Commission finds that, per the process approved in the June 12 order, the Staff cannot provide the requested RERRA verification for all three Projects because the Staff has not completed an audit of the RFP results for the Monroe Storage Project and the Fermi Storage

⁶ The Au Gres Solar Park Project is the subject of a July 31, 2025 application for approval under MCL 460.6t pending before the Commission in the instant docket. The Staff has completed its audit of the RFP results that led to the selection of the Au Gres Solar Park Project.

Project, and thus the Staff cannot confirm that those two projects are the winning bidders of the associated RFP conducted pursuant to the IRP approved in the July 26 order. As DTE Electric's supporting evidence shows, each of those two projects is simply "shortlisted." Application, Exhibits 1 and 2. In the June 12 order, the Commission found that the Staff could approve IOU-submitted RERRA verification requests on behalf of the Commission if they meet the following criteria: "the project is aligned with a Commission-approved IRP, clean energy plan, renewable energy plan (REP), or certificate of need (CON), and is the winning bidder of an RFP that meets the guidelines outlined in the Commission-approved competitive bidding guidelines adopted in the September 9, 2021 order in Case No. U-20852." June 12 order, p. 7 (Section 1.a.).

Because DTE Electric has not shown that each of the Projects is the winning bidder of the appropriate RFP, the Commission finds that the company's application must be decided by the Commission. The review process approved in the June 12 order indicates that where the Staff is unable to make the determinations required under Section 1.a., "the Commission will consider the matter for approval upon the filing of a petition for approval by the interconnection customer" and further states that:

[t]urning to the interconnection customer's application process to request a written notification verification with recommendation from a RERRA, the Commission proposes to consider all applications submitted by interconnection customers for inclusion in ERAS on a case-by-case basis. Under the proposed process, the interconnection customer shall file the request in the approved or pending associated IRP, REP, CON, or contract approval docket.

June 12 order, pp. 8-9 (Sections 2 and 3). DTE Electric has filed the RERRA verification request in the approved associated IRP docket.

The Commission finds that the Projects qualify for RERRA verification. While two of the Projects cannot be confirmed to be the winning bidders of their respective RFPs, the Commission finds that all three Projects qualify for inclusion in the ERAS process for several reasons. The

ERAS tariff requires the RERRA to find either that the project “will address a resource adequacy deficiency” or that “the new, incremental load . . . is valid.” Revised MISO filing, Tab A Redlines, Attachment X, Section 3.9.1; *see also*, July 21 FERC order, p. 93. The Commission determines that the Projects meet this criteria because they are consistent with the state’s clean energy goals as well as the storage targets under Act 235. Additionally, each of the Projects will make use of a point of interconnection that is proximate to an existing point of interconnection, thus significantly reducing the need for more newly built infrastructure. While not all clearly winning bidders, the Projects are aligned with the goals of the proposed course of action approved in the July 26 order. And finally, each project will result in a build-transfer agreement or a power purchase agreement selected through competitive bidding with a third party. For these reasons, the Commission supplies the requested RERRA verification.

As noted by DTE Electric, this RERRA verification is for ERAS purposes only and does not constitute a finding that the Projects are reasonable and prudent or used and useful. Decisions regarding cost recovery associated with any aspect of the Projects will be made in the appropriate rate case or other cost recovery proceeding. DTE Electric will be responsible for all costs associated with the Projects if all or any one of them are not built. The Commission notes that in the August 7, 2025 order in Case No. U-21902, the Commission finds that:

the RERRA verification has no relevance to the issue of cost recovery, including interconnection costs, transmission costs, or any other costs associated with the project seeking ERAS treatment. The RERRA verification does not constitute an approval or a presumption of approval for any project and does not constitute a finding on the underlying merits of any project seeking ERAS treatment. Should an LSE present its RERRA verification in a proceeding addressing the merits of the associated contract (such as a proceeding seeking approval of the contract) or a proceeding addressing cost recovery (such as a rate case), the ERAS tariff makes clear that such evidence is of no relevance to the issues presented.

August 7, 2025 order in Case No. U-21902, p. 20.

The Commission further finds that *ex parte* review and approval are appropriate because issuance of the RERRA verification will not affect rates or rate schedules resulting in an increase in the cost of service to customers. *See*, MCL 460.6a(3).

THEREFORE, IT IS ORDERED that the August 4, 2025 application filed by DTE Electric Company seeking *ex parte* approval of a request for the relevant electric retail regulatory authority's verification that the Monroe Storage Project, the Fermi Storage Project, and the Augres Solar Park Project qualify for inclusion in the Midcontinent Independent System Operator, Inc.'s Expedited Resource Addition Study process is approved.

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

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

MICHIGAN PUBLIC SERVICE COMMISSION

Daniel C. Scripps, Chair

Katherine L. Peretick, Commissioner

I abstain.

Shaquila Myers, Commissioner

By its action of August 7, 2025.

Lisa Felice, Executive Secretary


PROOF OF SERVICE

STATE OF MICHIGAN)

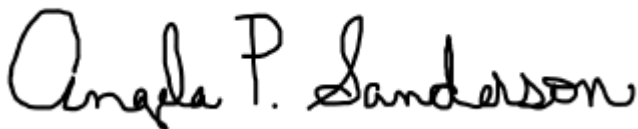
Case No. U-21193

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on August 7, 2025 A.D. she electronically notified the attached list of this **Commission Order via e-mail transmission**, to the persons as shown on the attached service list (Listserv Distribution List).


Brianna Brown

Subscribed and sworn to before me
this 7th day of August 2025.



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

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