

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

PJM Interconnection, LLC

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)

Docket No. ER23-1075-000

**NOTICE OF INTERVENTION AND COMMENTS IN SUPPORT
OF THE MICHIGAN PUBLIC SERVICE COMMISSION**

Pursuant to Rule 214 of the Rules of Practice and Procedures of the Federal Energy Regulatory Commission (FERC or the Commission), 18 C.F.R. § 385.214 (2021) the Michigan Public Service Commission (Michigan PSC) submits this notice of intervention and comments in support of PJM Interconnection, LLC's (PJM) February 9, 2023 filing of an executed Interconnection Service Agreement (ISA) among PJM, New Covert Generating Company, LLC, (New Covert) and ITC Interconnection LLC (ITC) (New Covert ISA).

I. NOTICE OF INTERVENTION

The Michigan PSC is a statutorily created agency charged with regulating natural gas and electric corporations within the State of Michigan. The Michigan PSC has a statutory mandate to represent the interest of natural gas and electric consumers throughout Michigan in proceedings before the FERC. It is, therefore, a State Commission as defined in section 2(8) of the NGA, 15 U.S.C. § 717a(8), and 18 C.F.R § 1.101(k). Accordingly, the Michigan PSC hereby provides it notice of intervention pursuant to Rule 214(a)(2), 18 C.F.R. § 385.214(a)(2).

Copies of all pleadings and correspondence in this proceeding should be sent to:¹

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¹ The MPSC requests waiver of the Commission's rules to the extent deemed necessary in order to allow all five of the MPSC's representatives to be listed on the official service list for this proceeding.

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II. COMMENTS IN SUPPORTS OF PJM FILING

The Michigan PSC supports expedited approval of the Interconnection Service Agreement among PJM, New Covert and ITC. The instant filing is directly related to a request of the Midcontinent Independent System Operator, Inc. (MISO) for Commission approval of MISO's proposal to convert PJM's interconnection of the Covert Generating Facility into a MISO generating unit.² As explained by the Michigan PSC in its comments in Docket No. ER23-1050, Consumers Energy Company's (Consumers) purchase of the Covert Generating Facility was approved by the Michigan PSC on June 23, 2022 as part of a settlement agreement on Consumer's Integrated Resource Plan (IRP).³ The acquisition of the Covert Generating Facility and interconnection into MISO Zone 7 is a key piece of the Michigan PSC-approved IRP and is needed to ensure resource adequacy and reliability in Michigan and Zone 7, particularly in light of the capacity shortfall in MISO'S 2022/2023 Planning Reserve Action (PRA). As MISO's filing indicates, in order for the Covert generating plant to participate in the 2023/2024 PRA, its existing PJM interconnection needs to be converted into a MISO interconnection by March 31, 2023.

² Michigan PSC Notice of Intervention and Comments filed on February 14, 2014, Docket No. ER23-1050.

³ Michigan PSC June 23, 2022 Order in Case No. U-2190. <https://mi-psc.force.com/sfc/servlet.shepherd/version/download/0688y000003KjSDAA0>

The instant filing by PJM reflects the upgraded capacity of the Covert Generating Facility to 1200 MWs. The Michigan PSC encourages swift Commission action in this docket in order to ensure that the Covert plant is able to fully participate in MISO's 2023/2024 Planning Year.

III. CONCLUSION

Based on the foregoing, the Michigan PSC requests the Commission to issue an order approving PJM's filing with an effective date of January 30, 2023.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document, via electronic mail or first class mail, upon each party on the official service list compiled by the Secretary of the Federal Regulatory Commission in this proceeding.

Dated at Washington, D.C., this 24th day of February, 2023.

/s/M. Denyse Zosa