Energy Choice Matters

April 16, 2009

RECs for Ohio RPS Must be Deliverable Into State; LSEs Must File 10-Year Compliance Plans

RECs used to comply with Ohio's new renewable portfolio standards must pass a deliverability test, PUCO ruled in a wide-ranging order on renewable and alternative energy mandates (08-888-EL-ORD).

To begin, one-half of the renewable energy (and solar carve-out) mandates must be met through use of in-state resources (Matters, 9/11/08, 9/10/08).

The new rules further require that any electricity from renewable energy resources, including solar energy resources, that originate from outside of Ohio must be shown to be deliverable into Ohio. PUCO expressly declined to accept LSEs' recommendation that any generation originating within PJM or MISO be considered deliverable into Ohio.

"[W]e believe a demonstration of delivery via a power flow study and/or deliverability study should be necessary, although not to the extent of requiring signed contracts," PUCO said in declining to change the draft language.

Additionally, unbundled RECs used for compliance are also subject to the Ohio deliverability standard.

PUCO clarified that environmental attributes may not be unbundled from RECs and sold individually, although a REC may be unbundled from the electricity with which the REC was

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FERC Rejects MISO As-Offered Payment Plan for Capacity Auction Defaults

FERC denied the Midwest ISO's petition to pay suppliers in the Module E voluntary capacity auction their as-offered price, instead of the clearing price, in cases of buyer default (ER09-757, Matters, 3/19/09). The Commission directed MISO to continue using the existing provisions in the tariff to address any default by a market participant in the voluntary capacity auction, which calls for maintaining the auction clearing price and using market-wide uplifts.

"We find that the proposal to use an 'as offered' settlement price in the case of a default puts suppliers in the capacity market at increased risk of not being paid the auction clearing price as compared to the existing Tariff that would spread the cost responsibility for such a default among a wider group of market participants," FERC said in finding the proposal to be unjust and unreasonable.

The Commission also found that the proposed as-offered settlement price could result in suppliers including risk premiums in their offers. FERC shared the concern voiced by Integrys Energy Services that maintaining the integrity of the auction clearing price and its price signal is important.

Furthermore, FERC said it is unclear how the use of as-offered settlement for capacity auction defaults is consistent with existing tariff provisions that assign cost responsibility for unpaid amounts in other MISO markets to all market participants transacting during the invoicing period.

FERC recognized MISO's desire to mitigate defaults and minimize uplift, and encouraged

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ICC Approves Ameren Capacity RFP

The Illinois Commerce Commission released the winning bidders and load weighted average prices from an April 13 RFP for capacity at the Ameren Illinois utilities which was approved by the ICC yesterday. Winning bidders were Allete (Minnesota Power), Ameren Energy Marketing, Consumers Energy, Dynegy Marketing & Trade, FirstEnergy Solutions, Fortis Energy Marketing & Trading, JP Morgan Ventures Energy, Reliant Energy Services, Sempra Energy Trading, Union Electric Company (AmerenUE), Wisconsin Electric Power and Wisconsin Public Service.

Load weighted average winning bids were as follows:

	2009-10		2010-11		2011-12	
Month	**MWs**	**Average per MW-month**	**MWs**	**Average per MW-month**	**MWs**	**Average per MW-month**
June	2,950	$197.08	2,110	$241.30	1,370	$318.66
July	3,500	$4,316.31	2,530	$4,867.59	1,630	$7,405.26
Aug	3,470	$3,367.60	2,500	$4,797.00	1,650	$7,253.47
Sept	2,780	$132.03	1,980	$204.83	1,300	$273.56
Oct	2,080	$49.93	1,480	$66.43	960	$93.83
Nov	1,980	$47.72	1,430	$61.88	910	$88.65
Dec	2,360	$55.58	1,690	$70.30	1,100	$102.32
Jan	2,340	$78.34	1,670	$91.01	1,100	$125.25
Feb	2,170	$65.69	1,560	$86.94	1,020	$114.67
Mar	1,910	$50.81	1,370	$83.49	900	$110.38
April	1,690	$48.69	1,240	$80.94	800	$106.41
May	2,200	$54.42	1,590	$90.67	1,040	$138.34

The target quantities were acquired for all 36 products

WGES Selected to Manage Md. State Electric Accounts

The Maryland Department of General Services yesterday announced the selection of Washington Gas Energy Services as the state's wholesale electricity portfolio manager. Under the arrangement, WGES will supply nearly 1 billion kilowatt-hours of electricity annually to Maryland, beginning in fiscal year 2010. The remainder of the state's 1.5 billion annual kilowatt-hour requirement will continue to be procured at a fixed price through an internet reverse auction.

WGES was selected through a competitive bid process for the $7.3 million contract to purchase power on the wholesale market and perform administrative functions for the state. Under the agreement, WGES purchased a block of power at an average price of 8.6¢/kWh for a total of $45 million spread over fiscal years 2010, 2011 and 2012.

Unlike past purchases in which 100% of the state's requirements were bought at one time at a fixed rate, WGES will buy portions of the Maryland government's annual requirements over time, buying blocks of electricity throughout the year to cover the state's needs. In tandem with peak shaving and on-site generation at several sites, the Department of General Services said the strategy is expected to realize savings of 10-15%, or $10-15 million over conventional energy purchasing.

The Department's news release quoted Governor Martin O'Malley as saying, "This is an excellent example of good government at work."

"With this strategy the State is leveraging its electricity buying power to provide a much needed measure of price stability and protection. Additionally, the expected savings can help further our goal of becoming a cleaner, more sustainable Maryland," O'Malley said. O'Malley had backed a failed bill which would have ended such electric choice for small customers.

Overall, the state has more than 4,300 accounts in the Allegheny, Baltimore Gas & Electric, Delmarva, and Pepco service territories.

EnerNOC Files for Rehearing of N.Y. Order on Affiliated Meter Data Service Providers

EnerNOC filed for rehearing and a stay of the New York PSC's recent decision regarding Consolidated Edison's Rider U Distribution Load Relief Program, due to the Commission's order that prohibits Meter Data Service Providers (MDSP) from also acting as demand response aggregators for program participants (08-E-1463, Matters, 4/8/09).

The Commission found that allowing aggregators to also serve as MDSPs threatens the integrity of the metering data, and presents potential conflicts of interest. The PSC adopted the recommendation of Energy Curtailment Specialists that the use of an independent, unaffiliated MDSP must be required for the reporting of meter data from customers.

Among other things, EnerNOC claimed such a finding was outside the scope of the case as defined in a State Administrative Procedure Act notice, thereby denying all interested parties the due process right of notice and an opportunity to be heard on the matter prior to final Commission action. ECS originally made the MDSP recommendation in comments on ConEd's Rider U filing, but EnerNOC argued the case was limited by the SAPA notice to consideration of tariff changes originally proposed by ConEd, and could not include ECS' petition absent a new, expanded notice.

Furthermore, EnerNOC argued there is no factual basis or record evidence to support ECS' claims that demand response providers acting in the capacity of an MDSP are providing inaccurate data.

"The combination of services provided by an MDSP that is also a demand response provider is exactly the type of innovation and cost-savings measure the Commission envisioned would result from competitive metering. EnerNOC's business model of operating as both a demand response provider and MDSP on behalf of its customers provides EnerNOC with the unique opportunity to reduce the cost of providing service to the customer, thereby, increasing the amount of compensation available to the customer for participation in the demand response programs," EnerNOC said.

Moreover, EnerNOC noted that utilities, which meter customer usage for delivery services and commodity supply which they sell, would presumably have the same conflict of interest in metering those services, as MDSPs would have in measuring customer usage for affiliated demand response providers.

"[T]he utilities have a clear financial interest in the meter data they collect with respect to their customer's usage; however, the Commission has never determined that this potential conflict of interest renders the utilities unable to fairly and accurately collect and report meter data regarding customer usage," EnerNOC pointed out.

Rather, the Commission relies on its oversight, regulation and performance standards to ensure data integrity and customer protection -- a model than can be used with affiliated MDSPs, EnerNOC said.

Market Monitor Reports Higher Congestion in CAISO in 2008

The California ISO experienced a dramatic increase in congestion costs in 2008, particularly on the major inter-ties with the Pacific Northwest, the Department of Market Monitoring (DMM) said in its annual report.

Total inter-zonal congestion costs were approximately $176 million in 2008, compared to $85 million in 2007. Most of the increase occurred in the spring and early summer, as a combination of abundant hydroelectric supplies in the Northwest and high natural gas prices increased demand and willingness to pay for using the major transmission facilities between California and the Pacific Northwest. Congestion costs also increased significantly on a major transmission link between Southern and Northern California (Path 15), due primarily to one of the three 500 kV lines that comprise the path being taken out of service for scheduled maintenance during October 14 to November 7, DMM reported.

Intra-zonal congestion costs also increased from $96 million in 2007 to $174 million in 2008. Intra-zonal congestion costs are comprised of three components: 1) Minimum Load Cost Compensation (MLCC) for units denied must-offer waivers, 2) real-time Reliability Must Run (RMR) costs, and 3) real-time redispatch costs. The increase is primarily attributable to higher MLCC payments and real-time redispatch costs. MLCC costs increased by $46 million in 2008, mainly due to the need to commit units in the summer months to relieve a transmission constraint in Southern California. The cost of real-time redispatch costs increased by $39 million in 2008, due in large part to the increased need to move resources committed at minimum load to higher dispatchable output levels where they have faster ramping capabilities.

Total RMR costs, including both fixed cost payments and variable cost payments for day-ahead and real-time dispatches, declined from approximately $121 million in 2007 to $71 million in 2008, mostly due to the reduction in the amount of capacity under RMR contracts, from approximately 3,400 MW in 2007 to 2,400 MW in 2008.

In 2008, Reliability Capacity Services Tariff (RCST) and Transitional Capacity Procurement Mechanism payments declined to approximately $3.4 million, of which $1.5 million were RCST payments and $1.9 million were TCPM payments. In 2007, the CAISO did not make any forward RCST designations but did make numerous daily capacity payments to non-RA units, amounting to approximately $26 million.

In comparing the sum of all reliability management costs (intra-zonal congestion, other RMR costs, and RCST/TCPM payments) to last year, the total for 2008 is approximately 5% higher than 2007 ($232 million in 2008 compared to $221 million in 2007). Higher intra-zonal congestion costs in 2008 were largely offset by the reduction in RMR costs and RCST/TCPM payments, DMM said.

The congestion, along with greater reliance on fossil fuel generation, pushed the average estimated cost of wholesale energy higher in 2008 to $53.01/MWh compared to $48.23/MWh in 2007.

DMM’s financial assessment of the potential revenues that a new generation facility could have earned in California’s spot market in 2008 indicates estimated spot market revenues fell short of the unit’s annual fixed costs. DMM said it was sixth straight year that DMM’s analysis found that estimated spot market revenues did not provide sufficient fixed cost recovery for new generation investment.

However, the analysis for the past four years (2005-2008) does show a positive trend of net revenues increasing for a new combined cycle unit, with estimated net-market revenues in 2008 of approximately $112/kW-year and $128/kW-year for Northern and Southern California, respectively, which is approaching the estimated annualized fixed costs of $132.6/kW-year.

DMM said its finding that estimated spot market revenues do not provide for fixed cost recovery, "underscores the critical importance of long-term contracting as the primary means for facilitating new generation investment."

Additionally, future market design features that could provide better price signals for new investment include: locational marginal pricing for spot market energy, local scarcity pricing during operating reserve deficiency hours, and possibly monthly and annual local capacity markets, DMM said. The CAISO Market Redesign and Technology Upgrade, which was implemented on April 1, 2009, will provide some of these elements (LMP, some degree of scarcity pricing).

DMM conceded that it could be alternatively argued that the lack of sufficient spot market revenues for new build is sending the right investment signal for the current market year (i.e., the generation level from a market efficiency standpoint was adequate in 2008). However, DMM stressed that the net revenues earned in 2008 are not indicative of future market revenue opportunities, which are the primary driver for new investment.

Only 45 MW of new generation was added in CAISO during 2008, though DMM said approximately 3,141 MW of new generation is projected to be operational in 2009.

Overall, DMM found that, "California's wholesale energy markets remained stable and competitive in 2008."

The trend is predominantly due to a high level of forward energy contracting by the state's investor owned utilities, which limits their exposure to spot market price volatility, enhances competition, and facilitates new generation investment, DMM noted.

PJM Asks FERC to Release Tower Emails

PJM petitioned FERC to release currently non-public "internal, non-privileged" e-mail communications among employees at various Tower Companies, in connection with PJM's complaint against the firms (EL08-49). PJM has made various allegations of market manipulation against the Tower Companies in relation to the default of Power Edge.

While the emails, "may be regarded as embarrassing by Tower, [they] cannot reasonably be viewed as qualifying under Commission regulation for confidential treatment, including as trade secret or commercial or financially sensitive information," PJM said.

PJM noted FERC's recent Staff report dismissing in part PJM's complaint against several Tower companies "selectively" made some of the emails public (Matters, 4/3/09). "The impact of the selective public release of similar type material in the Enforcement Staff interim report is prejudicial and provides interested parties an incomplete point of reference," PJM argued.

A recent court order holds that the court's protective order does not preclude FERC from releasing the emails, PJM said.

PJM, which itself has been criticized in the past by various state regulators for nontransparent operations and a reluctance to share data, said market participants need to have access to the currently non-public materials in order to evaluate their strategies for recourse given the Commission's recent dismissal of part of PJM's complaint.

"Without immediate action, PJM and its members must decide now how they pursue this matter given deadlines established by the Federal Power Act and the Commission's regulations, without the benefit of all relevant information," PJM said.

"The release of information bearing on [the Tower companies'] practices is necessary and in the public interest. At a time when the integrity of corporate America, with particular focus on financial institutions and money managers, is challenged by almost daily revelations of scandals, scheming, and illegal practices, the PJM public is entitled to understand the full record bearing on how these hedge funds constituted and conducted their business in PJM," PJM said.

Reliant Energy Electric Solutions Subsidiary Won't be Part of NRG Transaction

Reliant Energy subsidiary Reliant Energy Electric Solutions, LLC will not be included in the sale of Reliant's Texas retail operations to NRG Energy, Reliant said in a FERC filing (ER09-892). Reliant Energy Electric Solutions, LLC is currently a power marketer that, among other things, participates in the ERCOT and PJM markets.

Originally, Reliant anticipated that, after the closing of the sale of its Texas operations to NRG, Reliant Energy Electric Solutions, LLC would only engage in marketing activities exclusively within ERCOT and would no longer do any business under its FERC tariff, which it accordingly requested to cancel.

An existing FERC reactive power tariff

pursuant to which Reliant Energy Electric Solutions, LLC receives revenue from PJM for the provision of reactive supply service was to be assigned to affiliate Reliant Energy Services, Inc. before the NRG transaction closed. Reliant Energy Electric Solutions originally expected that non-ERCOT confirmations and agreements of wholesale electric sales held by it, and related books and records, would either be mutually terminated or assigned to Reliant Energy Services, Inc.

However, Reliant said it has been determined that Reliant Energy Electric Solutions, LLC will not be part of the NRG transaction. Thus, it sought to withdraw its request to cancel its FERC market-based rate tariff.

Briefly:

Revised ERCOT Study Adds $25 Million to Cost of Entergy Integration

Reliability projects to integrate Entergy Texas into ERCOT are now expected to cost $510.7 million, according to ERCOT's revised Phase III study report (33687). The revised report reflects the impacts of 67 multiple-element contingencies that were not included in the input data sets for the original Phase III report filed in December, which had pegged reliability project costs at $483.8 million (Matters, 12/8/08). The revised Phase III report maintains the previous estimate of $283.0 million for the cost of economic-driven projects which may be pursued under integration. ERCOT said the economic-driven projects would result in annual production cost savings of $58 million, which is more than 16.5% of the capital cost of the upgrades, the current ERCOT criterion for recommending economic transmission projects.

NYISO to Implement Netting Bilaterals in Third Quarter

The New York ISO has drafted necessary tariff revisions to allow market participants to net bilaterals, with such language scheduled to be voted on by market participants at the Business Issues Committee meeting in May 2009, the NYISO said in a quarterly update at FERC (ER03-552-011). NYISO said the netting bilaterals project, long sought by retail marketers, is on schedule for deployment in the third quarter of 2009, with a FERC filing for approval expected in the second quarter.

Ontario Energy Board Sets Regulated Rates

The Ontario Energy Board announced that Regulated Price Plan rates will increase by 0.1¢/kWh for the six-month period starting May 1, to 5.7¢/kWh for usage up to 600 kWh each month; and 6.6¢/kWh above that. Time-of-Use prices have been adjusted for all three periods as follows:

• On-peak: 9.1¢/kWh
• Mid-peak: 7.6¢/kWh
• Off-peak: 4.2¢/kWh

N.Y. PSC Sets Technical Conference on NYSEG/RG&E Nonbypassable Charges

The New York PSC scheduled a technical conference for April 28 on NYSEG's and Rochester Gas and Electric's applications to make two interim adjustments to the current nonbypassable charges, and to implement a monthly reconciliation in 2010 (09-E-0228 et. al.). NYSEG and RG&E had made the requests in connection with their decision to cease offering a fixed price option for customers after 2009 (Matters, 3/9/09). Under the proposed nonbypassable mechanism for 2010, all customers in a given service class would pay the same charge, regardless of supplier. In their petitions, NYSEG and RG&E also filed to make various changes to the components and mechanisms of setting the monthly variable commodity price of electricity, designed to make the charges consistent between the two utilities, and with practices at other utilities in the state.

Md. PSC Sets Session on Natural Gas Rules

The Maryland PSC set a rulemaking session on RM 35, rules for the competitive natural gas market, for May 19, and is accepting comments on Staff's latest proposal through May 1. Staff's latest draft is the same as the rules considered at a March meeting, but excludes service to daily metered accounts and interruptible accounts from the RM 35 provisions (Matters, 3/11/09). RM 35 would establish various enrollment and billing procedures for natural gas, including a requirement for utilities to either pro-rate partial payments to suppliers, or implement a purchase of receivables program.

Integrys Energy Services Product Certified by Green-e

Integrys Energy Services said yesterday that its Ecovations REC product is now Green-e Energy Certified. Charles Koontz, General Manager for renewable energy, efficiency, and conservation at Integrys Energy Services said that, “Customers have repeatedly asked us for products that allow them to back up their environmental commitments with concrete, measurable action, and this is part of our response."

Service Date of PATH Line Pushed to 2014

AEP and Allegheny Energy announced that the in-service date for their joint Potomac-Appalachian Transmission Highline from southwestern West Virginia to central Maryland has been pushed to June 2014 from June 2013 due to a recent reliability analysis by PJM that shows that significant overloads and voltage problems expected without the line will not occur until 2014. The utilities expect to file applications for approval to build the line with the West Virginia, Maryland and Virginia regulatory commissions in the second quarter. "Timely approvals by the state commissions are needed to meet the new deadline established by PJM," AEP and Allegheny said. The PATH line is one of two lines which the Maryland PSC is closely monitoring to meet originally projected reliability needs for the 2011-12 timeframe, which prompted the Commission to procure load response as insurance against potential capacity shortfalls.

MISO Reports Excelsior Default

The Midwest ISO reported that Excelsior Ltd. was in default for failure to cure a total potential exposure violation.

PUCO Accepts Revised Rider PTC-AAC at Duke

PUCO approved Duke Energy Ohio's requested adjustment to true-up bypassable electric Rider PTC-AAC, which reflects environmental compliance, Homeland Security, and tax charges (Matters, 11/26/08). Specific amounts of the bypassable rider per rate class may be found in docket 08-1025-EL-UNC.

Calif. Working Group Reports on Novation Process

A California working group submitted a report on efforts to develop protocols and strategies for novating Department of Water Resources supply contracts to the utilities, a step meant to accelerate a potential return to direct access (R. 07-05-025). The group reported both Pacific Gas and Electric and San Diego Gas and Electric may have staffing limitations that prevent them from starting negotiations on non-priority contracts that contain novation clauses, though SDG&E also said that it would not be a bottleneck in the process. Under the California PUC's order, first priority in the assignment process is addressing the Sempra and Coral contracts which lack novation clauses and have been subject to litigation. The working group report also sets deadlines for future monthly progress reports.

First Solar to Expand Plant for Sempra

First Solar said it has executed an agreement to build a 48 MW (AC) ground-mounted photovoltaic power plant for Sempra Generation to expand the 10 MW (AC) power plant First Solar completed for Sempra Generation in 2008 near Boulder City, Nev. Sempra Generation will own and operate the PV power plant, and the agreement is conditioned upon Sempra Generation executing a power purchase agreement with a utility customer for the electricity generated by the PV power plant.

Ohio RPS ... from 1:

originally associated. The Commission believes that the unbundling of RECs from the associated electricity is consistent with legislation and should result in lower costs of compliance.

Only RECs generated after the effective date of SB 221 are eligible for use in compliance with the new renewable standards.

RECs retained by the original generator have an unlimited life, while purchased or acquired RECs will have a life of five years from the date of initial purchase or acquisition. Owners of distributed generation retain their associated RECs unless there is contractual language that dictates otherwise.

Responding to concerns from competitive suppliers, the Commission removed an earlier provision which would have excused new competitive providers from complying with the portfolio standard requirements in their first year of service, since new providers would not have any sales history to establish an applicable baseline. Competitive suppliers had argued that such a provision would disadvantage those suppliers currently operating in Ohio, and suggested that their prior sales be grandfathered by only counting prospective sales in the baseline, to effectively level the playing field with new entrants. PUCO declined the latter suggestion, but did seek to remedy any competitive disadvantage by requiring new entrants to submit a "reasonable" projection of sales for their first year, which will be used as the baseline calculation during their initial year of operation in the state.

Though PUCO did shorten its long-term alternative energy compliance planning requirement applicable to all LSEs, including competitive suppliers, from 15 years to 10 years, PUCO essentially dismissed concerns from marketers that such long-term planning is inconsistent with competitive retail operations. Marketers had recommended a one-year horizon for compliance plans since they typically enter into short-term contracts, and are unable to predict with any meaningful degree of certainty what their customer load will be beyond the following year.

Under the new rules, suppliers will be required to file an annual alternative energy report using a 10-year planning horizon which details:

(1) The supplier's baseline for the current and future calendar years;

(2) A supply portfolio projection, including both generation fleet and power purchases;

(3) A description of the methodology used by the company to evaluate its compliance options, and

(4) A discussion of any perceived impediments to achieving compliance with required benchmarks, as well as suggestions for addressing any such impediments.

PUCO also declined to set any specific mechanism for evaluating petitions by competitive suppliers for a waiver of alternative energy standards compliance, due to costs which would exceed the applicable cost cap. During the case, suppliers noted that the 3% cost cap framework for utilities is not applicable to competitive supply contracts which are customer-specific and may lack a specific "generation" rate (by bundling several services). Suppliers suggested using Energy Information Administration data as a proxy in the cost cap calculations. The Commission said such concerns will be addressed on a case-by-case basis upon a supplier petitioning for relief from compliance under the cost cap.

Additionally, the Commission rejected pleas from marketers to correct a competitive disadvantage they will face due to the rules' provisions allowing utilities to count mercantile customer-sited resources as alternative energy resources, while not extending the same provision to competitive retailers. PUCO justified its decision by stating that statute limits the ability of mercantile customers to commit advanced energy resources or renewable energy resources, "into the electric distribution utility's demand-response, energy efficiency, or peak demand reduction programs."

PUCO said it is open a compliance construct using energy efficiency credits (e.g. white tags), but did not implement such a trading system in its order. The rules, however, do not preclude such a credit system. The Commission also noted that provisions allowing LSEs to bank excess load reductions from efficiency measures in past years addresses some of the reasons for establishing an energy efficiency credit mechanism.

The Commission did not adopt Duke Energy's suggestion to allow utilities to impose a nonbypassable surcharge for capacity and other non-energy costs related to compliance with alternative energy compliance. PUCO's final rule holds that "all costs" incurred by an electric utility in complying with the alternative energy requirements shall be avoidable by any shopping customer. While new utility generation may still qualify for a nonbypassable surcharge under other provisions of the Revised Code, the provision is not limited to renewable resources, and does prohibit a surcharge for generation already serving Ohio load.

As previously reported, SB 221 established a mandate for alternative energy resources, which includes both "advanced" energy, and renewable energy with a solar carve-out. Advanced energy includes several technologies such as clean coal and fuel cells, and also includes demand response and energy efficiency measures. The law does not set a specific target for the use of advanced energy resources, but permits their use for up to one-half of the total 25% alternative energy resource target which takes effect in 2024. Furthermore, the act sets minimum mandates for renewable energy which start prior to 2024, and increase gradually through 2024, excerpted below:

Year-End	Renewable %	Solar %
2009	0.25%	0.004%
2010	0.50%	0.010%
2011	1.00%	0.030%
...		
2024	12.5%	0.500%

Renewable resources may be used in lieu of advanced energy to meet the 25% overall alternative energy requirement in 2025.

MISO Auction *... from 1:*

MISO to continue working with stakeholders to develop an alternative approach.

The Commission also rejected MISO's petition to shorten the period for paying Module E deficiency charges to two business days, because other bills in the market are due within seven days, and the same timeline should apply.