

20. How has Michigan, and how have other jurisdictions, treated energy efficiency or optimization and renewables as related or separate? For instance, have credits generated from one or the other been interchangeable or separate? What have been the cost, reliability, and environmental impacts of different regimes?

Section 27 of Act 295 includes a provision allowing for the substitution of energy optimization credits, among others, for renewable energy credits up to 10% of the RPS. The Commission has approved substitutions of energy optimization credits for renewable energy credits for Michigan's two largest utilities.

A website review and calls to Commission Staff of neighboring states indicates these states do not allow substitution of energy optimization credits for renewable energy credits.