

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter, on the Commission's own motion,)	
to adopt revised renewable energy plan filing)	
requirements.)	Case No. U-18409
_____)	

At the August 23, 2017 meeting of the Michigan Public Service Commission in Lansing,
Michigan.

PRESENT: Hon. Sally A. Talberg, Chairman
Hon. Norman J. Saari, Commissioner
Hon. Rachael A. Eubanks, Commissioner

ORDER APPROVING FILING REQUIREMENTS

History of Proceedings

On December 21, 2016, Governor Rick Snyder signed into law 2016 PA 342 (Act 342), which amended 2008 PA 295, MCL 460.1001 *et seq.* (Act 295).¹ In 2008, the Commission developed renewable energy plan (REP) filing requirements to provide guidance to electric providers in preparing initial REPs.² To address the changes resulting from the enactment of Act 342, the Commission found it reasonable to evaluate and update REP filing requirements. In an order issued on May 31, 2017, the Commission provided interested persons an opportunity to comment on the proposed REP filing requirements, which were attached to the order.

¹ Act 342 was effective April 20, 2017.

² *See*, the December 4, 2008 order in Case No. U-15800, which may be accessed at <http://efile.mpsc.state.mi.us/efile/docs/15800/0001.pdf>.

The specific changes to the filing requirements that the Commission recommended included a request for information on how the plan is consistent with the purposes and goals contained in MCL 460.1001(2) and (3) and additional sales and renewable energy credit (REC) forecasts to show progress toward the 35% goal for renewable energy and energy waste reduction (EWR) by 2025.

Initial and reply comments were due by June 30 and July 21, 2017, respectively. Initial comments were filed by Consumers Energy Company (Consumers); DTE Electric Company (DTE Electric); Environmental Law & Policy Center and the Michigan Environmental Council (together, ELPC) and the Natural Resources Defense Council (NRDC). Reply comments were filed by Consumers and DTE Electric.

Comments

In their initial comments, DTE Electric and Consumers generally agreed with the proposed REP filing requirements. DTE Electric supports highlighting compliance with the 2021 standard through August of 2029, rather than 2025, including sales forecasts and quantity of RECs, in accordance with the 20-year plan. DTE Electric contends that by forecasting through 2029, under the REC standard set forth in MCL 460.1028, providers will also supply the relevant information showing progress toward the 35% overall goal as set forth in Item 3 of the proposed filing requirements. DTE Electric adds that the energy waste reduction component of the 35% goal should not be addressed in REP proceedings and that it should be clarified that the 35% goal is not intended to be met solely by RECs.

Additionally, DTE Electric recommends that Attachment A, Line 10 of the Renewable Energy Plan Summary Worksheet should specify compliance through August of 2029. The company further notes that Line 26 of the Renewable Energy Plan Summary Worksheet adds a line item for

costs of administration of the REP. The worksheet does not define “costs of administration,” however, DTE Electric suggests that this information consist of labor cost attributable to plan administration.

Consumers similarly recommends revising the proposed language in Item 1 of Attachment A to clarify that the 35% amount is not a requirement that electric providers must meet. AS was the case with DTE Electric, Consumers also recommends a revision to Item 3 of Attachment A to clarify that that the quantity of RECs is not the only consideration towards achievement of the 35% goal.

Consumers recommends a revision to Item 7 of Attachment A to make the language consistent with the order issued on December 4, 2008 in Case No. U-15800 (Temporary Order). Consumers raises a concern that the proposed language in Item 7 requiring the company to “take into account the transfer price schedule filed in U-15800 and previously approved by the Commission” gives the impression that electric providers are prohibited from proposing different transfer prices, contrary to Section 47 of Act 295. Consumers contends that its proposed revision still requires electric providers to provide a transfer price forecast as part of its REP, but avoids any inconsistencies between Item 7 and Section 47.

Finally, Consumers recommends revising one of the bullets under Item 8 of Attachment A, to make clear that only renewable energy-related costs, not EWR costs, are included as the incremental cost of compliance.

ELPC comments that the Commission should consider adding language to ensure that the “Detailed Resource Plan” includes a description of the utility’s proportional reliance on different renewable technologies (e.g., solar, wind, biomass), different market segments (residential, commercial, industrial), different ownership models (customer-owned, developer-owned, or

utility-owned), and different program types (e.g., rebates, requests for proposals (RFPs), feed-in tariffs, community solar) that the utility intends to use to meet the REP requirements.

Consumers replies that Section 1(2) of Act 295 does not require the utilities to provide the “proportional reliance” that ELPC recommended, and although the Commission has indicated that resource diversity must be considered in evaluating an REP, the Commission did not create, and Act 295 does not establish, an independent resource diversity requirement. Consumers maintains that the REP filing requirements should not result in elevating the consideration of resource diversity into its own separate and independent test to be met in an REP.

Although it is implied by the statute, ELPC further recommends that the Commission consider explicitly requesting that the utility provide a description and documentation for how the REP will promote the Section 1(2) purposes of the Act, including resource diversity, energy security, private investment, improved air quality, and other benefits.

Consumers replies that Act 295 does not require the REP to “promote” the purposes of Section 1(2), but rather be “consistent” with those purposes. Thus, Consumers argues that ELPC’s recommendation would require the utilities to make a showing not required in Act 295, and the determination of whether an REP is consistent with Act 295 does not require the additional information that ELPC suggests.

Finally, ELPC recommends that the REP should provide a “line of sight” regarding how it will lead to compliance (along with utility’s EWR plan) with the combined goal of 35% set forth in Section 1(3) of Act 295. According to ELPC, this additional information could help reduce uncertainty, expense, and the number of contested issues in future REP cases.

Consumers replies that it is unclear what ELPC means by “line of sight” and, in any event, a utility’s energy efficiency measures should be considered in EWR proceedings conducted pursuant

to Sections 73 and 74 of Act 295. Consumers explains that although the REP will provide the RECs planned to count toward the 35% goal under Section 1(3) of Act 295, the combined amounts of renewable energy and EWR will be considered in integrated resource plan (IRP) proceedings, under MCL 460.6t, and therefore should not be considered in REP proceedings. DTE Electric disagreed with ELPC's suggestion that Act 295, as amended by Act 342, now contains broader, more stringent requirements based simply on a change of the stated purpose of the statute. DTE Electric maintains that the purpose of Act 295 has not been significantly altered by Act 342, albeit with the addition of the 35% goal. According to DTE Electric, this addition does not create a higher legal standard nor should it lead to additional program requirements.

ELPC comments that the Commission should clarify the distinction between the REP designed to meet the renewable energy standard and renewable energy offered as part of the voluntary green pricing program required pursuant to Section 61 of Act 295. Implementation of the voluntary green pricing program should be kept outside the REP and addressed in separate dockets or as part of general rate cases.

Consumers disagrees, stating that the Commission has determined that electric providers should be allowed "some leeway in designing and refining" the voluntary green pricing programs under Section 61 of Act 295. *See*, July 12, 2017 order in Case No. U-18349, p. 4. Consumers observes that, although the Commission found that the purpose of Section 61 is to augment the 15% amount of renewable energy required under the REP, the Commission also concluded that it was reasonable for unsubscribed portions of Section 61 programs to be reallocated to a provider's REP, provided there is proper accounting of costs. Thus, Consumers maintains that providers should be allowed to use projects (or portions of projects) developed under a provider's REP for Section 61 voluntary green pricing programs, as long as the RECs under the Section 61 programs

are not counted toward the REC standard under Section 28 of Act 295. Consumers points to its Solar Gardens Program, which permits the unsubscribed portion of the solar facilities to run through the REP.

DTE Electric agrees with ELPC that there should be a distinction between renewable energy that is attributable to the REP and renewable energy that is subscribed in a voluntary green pricing program to ensure that RECs are not double counted. Nevertheless, DTE Electric agrees with Consumers that unsubscribed portions of voluntary renewable energy programs should be included in the company's REP.

ELPC argues that the method by which a utility acquires renewable assets is critical to the determination of whether renewable energy costs are reasonable. Accordingly, ELPC maintains that the plan should contain a detailed explanation of the provider's RFP and bidding processes, and plans lacking a robust bidding process should be subject to heightened scrutiny to determine if the costs reflect market prices. In addition, ELPC contends that the RFP and bidding processes should be evaluated for their ability to take advantage of favorable tax treatment and avoid creating booms and busts in the building cycle that tend to drive up renewable energy costs.

Consumers disagrees that any additional scrutiny is required under Act 295, arguing that an electric provider may not have completed conducting and evaluating RFPs for all planned projects at the time of filing its REP filing. Nevertheless, the Commission will have the opportunity to review any contracts entered into, and the bidding process of those contracts, at the time the rate-regulated electric provider files those contracts for approval. *See* MCL 460.1028(4).

ELPC also recommended that in the future, providers should also be required to study where, within their systems, the addition of distributed resources would provide the greatest benefit.

Consumers replies that no such study is required or envisioned under Act 295, and the utilities should not be obliged to perform such a study as a part of their REP filings. According to Consumers, the REP is not the place to evaluate a utility's grid system because the determination of grid benefits involves considerations other than just the addition of distributed resources. Likewise, DTE Electric asserts that a grid study is not a requirement of the law, and is outside the scope of the REP. Additionally, for utility-owned projects, DTE Electric contends that it considers a multitude of factors when siting projects, including land availability, local permitting, and availability of distribution and transmission. DTE Electric adds that siting of customer-owned distributed generation projects to offset congestion in the distribution system is outside utility control and is not a requirement of Act 295.

NRDC comments that the IRP should serve as the comprehensive utility planning tool with other plans, such as REPs, incorporated into the broader IRP. Therefore, NRDC recommended that the REP filing requirements include a section wherein the utility provides details about how the REP corresponds to the IRP.

NRDC further comments that the proposed filing requirements appear to only address private investment under the RFP/Bidding process section with no further guidance provided. NRDC contends that the filing requirements should be more explicit with respect to encouraging private investment and that, at a minimum, language should be included that articulates this must be a public bid. In addition, the filing requirements should require the utility to articulate the percentage of renewables in its plan that are owned by the utility, compared to private investors, and to provide this information over a series of years to show whether private investment is increasing, staying level or decreasing. NRDC also recommends that utilities provide an

explanation of how the REP relates with other programs such as the green pricing program under Section 61, the net-metering program, and the RFP requirements under MCL 460.6t.

Consumers replies that IRP filing requirements under Section 6t are still being developed and, in any event, Act 295 does not impose those requirements on REP filings. DTE Electric also disagrees that the REP filing requirements should clarify how the REP is coordinated with the company's IRP. According to DTE Electric, all assets that are approved in the REP are included in the IRP reference cases and scenarios as given, and adding this to a reporting requirement in the REP filing is unnecessary. With respect to RFP and bidding processes, DTE Electric maintains that there already exists a formal process for RFPs and bidding projects and the company contends that this process should continue.

Consumers comments that a provider should not be required to present information on the proportion of company-owned renewables in its plan. Consumers points out that Act 295 does not require a specified amount of private investment in renewable energy, and does not require a utility to account for the amount of private investment. Similarly, DTE Electric points out that Act 342 eliminated the ownership requirements originally contained in Act 295, and it contends that including a requirement that the company describe ownership of the different resources would be contrary to Act 342, which repealed Section 33 of Act 295.

Discussion

The Commission finds that the proposed filing requirement for REPs should be adopted with the updates and clarifications discussed below. Revised REP filing requirements, consistent with this order, are attached as Attachment A.

The Commission agrees with DTE Electric that all forecasts contained in the filings and summary tables should be based on the 20-year plans approved in 2009, and thus should extend

until 2029. The Commission agrees that this will provide some insight into the provider's progress towards the 35% goal, recognizing that this is a goal, and not a mandate, and that it includes some yet-to-be-determined, presumably optimal mix of renewables and EWR. The Commission finds that the filing requirements are sufficiently clear in stating that the information supplied only applies to forecasted RECs and not to EWR, which is addressed in other proceedings. The Commission further observes that Attachments A, B, and C to the filing requirements pertaining to rate-regulated utilities; alternative electric suppliers and member-regulated electric cooperatives; and municipal electric providers should be consistent.

Similar to the 35% renewable energy and EWR goal, the other objectives contained in MCL 460.1001, namely resource diversity, use of indigenous resources for the purpose of energy security, encouragement of private investment, coordination with federal regulations to improve air quality, and the removal of burdens on the use of solid waste as a clean energy resource are factors that the Commission must consider in determining whether an REP is reasonable and consistent with Act 295. Thus, a forecast of the mix of technologies, and whether projects are owned by the provider or a third-party, is relevant to the Commission's determinations under Act 295,³ and a projection of this information should be included in the REP filing in the "Detailed Resource Plan" section. Similarly, for meeting the renewable energy portion of the 35% goal, MCL 460.1001(3)(a) provides:

All renewable energy, including renewable energy credits purchased or otherwise acquired with or without the associated renewable energy, and any banked renewable energy credits, that counted toward the renewable energy standard on the

³ The Commission notes that historical information on resource mix and ownership are available in the providers' annual reports and, in summary form, in the Commission's annual report on renewable energy available on the Commission's website: http://www.michigan.gov/documents/mpsc/MPSC_PA295_Renewable_Energy_Report_Feb_2017_552081_7.pdf

effective date of the 2016 amendatory act that added this subsection, as well as renewable energy credits granted as a result of any investments made in renewable energy by the utility or a utility customer after that effective date.

In order to gain a fuller picture of the sources of renewable energy a provider intends to use for compliance with the Act 295 renewable energy mandates and goals, providers should also include a forecast of the RECs from different program types including Public Utility Regulatory Policies Act contracts, distributed generation, feed-in tariffs, community solar and any other programs that provide RECs.

The Commission concurs with the revision, suggested by Consumers, to omit language referencing transfer prices filed in Case No. U-15800. The Commission agrees that the originally proposed language is inconsistent with Section 47 of Act 295. The Commission also notes that, pursuant to the July 12, 2017 order in Case No. U-18349, voluntary green pricing programs under Section 61 of Act 295 are evaluated separately from REP programs and should not be included in REP filings. The Commission also agrees with Consumers that RFP and bidding processes are evaluated when contracts are presented for approval, and that the siting of renewable energy projects is outside the scope of an REP proceeding.

Finally, with respect to the correspondence between REPs and IRPs, the Commission agrees with NRDC that, eventually, a provider's IRP will serve as the broad planning tool that encompasses not only renewable energy but also demand response, EWR and other demand and supply-side resources. Accordingly, the Commission expects that in the future, once IRP proceedings are completed, the filing requirements will include a description of how the REP correlates with the approved IRP.

THEREFORE, IT IS ORDERED that the renewable energy plan filing requirements, attached as Attachment A, are 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, under 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 mpscedockets@michigan.gov and to the Michigan Department of the Attorney General - Public Service Division at pungp1@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

Sally A. Talberg, Chairman

By its action of August 23, 2017.

Norman J. Saari, Commissioner

Kavita Kale, Executive Secretary

Rachael A. Eubanks, Commissioner

EXHIBIT A

**Michigan Public Service Commission
2008 PA 295 Amended by 2016 PA 342**

**Filing Requirements and Instructions for
Renewable Energy Plans
for Michigan Investor-Owned Retail Rate-Regulated Electric Utilities**

PA 295 of 2008 Section 22 *Each electric provider shall file an amended renewable energy plan with the commission by the date established by the Commission in MPSC Case No. U-15825, et al. The amended plan shall meet all of the following requirements:*

- (a) Describe how the electric provider will meet the renewable energy standards.*
- (b) Specify whether the number of megawatt hours of electricity used in the calculation of the renewable energy credit portfolio will be the previous year weather-normalized retail sales or based on the average number of megawatt hours of electricity sold by the electric provider annually during the previous 3 years to retail customers in this state.*
- (c) Include the expected incremental cost of compliance with the renewable energy standards for the plan period ending in 2029.*
- (d) Describe how the electric provider's plan is consistent with the 35% goal by 2025. PA 295 of 2008 Section 1(3).*

PA 295 of 2008 Section 22(2) *The proposed plan shall establish a nonvolumetric mechanism for the recovery of the incremental costs of compliance within the electric provider's customer rates.*

The following suggests several elements that address the specific items to be included in the plan filings. They are not necessarily exhaustive.

1. Sales Forecast through 2029 for compliance with the renewable energy standard in Section 28 and to show progress toward the 35% goal.
 - Specify whether megawatt hours of electricity used in the calculation is the previous year's weather-normalized retail sales or based on the average number of megawatt hours of electricity sold by the electric provider annually during the previous 3 years to full service retail customers in the state (**PA 295 of 2008** Section 28(1)(i)(ii) and Section 1(3))
2. Forecast of Meters by Customer Class through the end of the plan period in 2029
 - This is needed in order to determine retail rate impacts by customer class (former **PA 295 of 2008** Section 45(2))
3. Quantity of RECs
 - Outline the quantity of RECs the Company forecasts it must obtain each year to meet the RPS (**PA 295 of 2008** Section 28(1))
 - Outline the quantity of RECs the Company forecasts it will obtain in 2025 to be counted toward the 35% goal. (**PA 295 of 2008** Section

1(3))

4. Detailed Resource Plan

- Describe the Company's planned renewable energy credit portfolio. Forecast RECs obtained via Michigan incentive RECs as provided for in **PA 295 of 2008** Section 39 (2)(a)(b)(c)(d)(e)
- Forecast expected compliance levels by year to meet the renewable portfolio targets.
- Identify key assumptions used in developing these forecasts and the proposed resource portfolio.
- Identify risks which may drive performance to vary.
- Forecast of the mix of technologies.
- Forecast of project ownership.
- Forecast of REC program type ie. Public Utility Regulatory Policies Act contracts, net metering, feed-in-tariff, community solar and any other programs.

5. Wholesale Customer Treatment (former **PA 295 of 2008** Section 35(1)(a)(b))

6. "Transfer Price" Forecast

- Forecast a price per MWh for each year of the remaining plan period ending in 2029 for renewable energy sold to full service retail customers, which will be used in calculating net incremental cost. (**PA 295 of 2008** Section 47 2(b)(iv))

7. Revenue Requirement

- Per (**PA 295 of 2008** Section 47(2)) Incremental costs of compliance **shall be calculated to include the following:**
 - Capital, operating and maintenance costs for renewable energy systems (including property taxes and insurance for renewable energy systems)
 - Financing costs
 - Costs that are not otherwise recoverable in base rates including interconnection and substation costs
 - Ancillary service costs
 - Cost of purchased RECs other than those purchased for non-compliance with **PA 295 of 2008** Section 28
 - Cost of contracts per **PA 295 of 2008** Section 28(4)
 - Expenses incurred as a result of governmental action including changes in tax or other laws
 - Any other renewable energy related costs that are necessary to implement the 20-year plan and the renewable energy portion of the 35% goal.

- Subtract revenues as identified in PA 295 of 2008 Section 47 2(b)
 - ex. transfer price, environmental attributes, interest on regulatory liability etc.
- Recovery to include the authorized rate of return on equity, which will remain fixed at the rate of return and debt to equity ratio that was in effect in base rates when the renewable plan was approved (**PA 295 of 2008** Section 47(1))

8. Cost Recovery Mechanism

- Forecast through the end of the plan period in 2029 of the nonvolumetric surcharge (**PA 295 of 2008** Section 47)
- Forecast through the end of the plan period in 2029 of the regulatory liability balance

9. Tariff Filings Reflecting the Cost Recovery Mechanism

10. Renewable Energy Plan Worksheets

- See attached renewable energy plan summary and renewable energy credit summary worksheets

**Michigan Public Service Commission
2008 PA 295 Amended by 2016 PA 342**

**Filing Requirements and Instructions for
Renewable Energy Plans
for Alternative Electric Suppliers
and Member-Regulated Electric Cooperatives**

PA 295 of 2008 Section 22(3) Within 1 year after the effective date of the 2016 amendatory act that added this section, the commission shall review each electric provider's plan pursuant to a filing schedule established by the commission. For an electric provider whose rates are regulated by the commission, the commission shall conduct a contested case hearing on the plan pursuant to the administrative procedures act of 1969, 1969 PA 306, MCL 24.201 to 24.328. After the hearing, the commission shall approve, with any changes consented to by the electric provider, or reject the plan and any amendments to the plan. For all other electric providers, the commission shall provide an opportunity for public comment on the plan. After the applicable opportunity for public comment, the commission shall determine whether any amendment to the plan proposed by the provider complies with this act. For alternative electric suppliers, the commission shall approve, with any changes consented to by the electric provider, or reject any proposed amendments to the plan. For cooperative electric utilities and municipally owned utilities, the proposed amendment is adopted if the commission determines that it complies with this act.

The following elements address the specific items referenced in previous commission orders as well as previously filed AES or member regulated cooperatives on what information may be included within a renewable energy plan under **PA 295 of 2008**. These suggestions are intended to be used only as initial guidance. They are not necessarily exhaustive.

1. Detailed Resource Plan

- Describe how the Company will meet the RPS including the source of energy credits and the expected timing of when the energy credits will be obtained and used for compliance
- Identify risks which may cause performance to vary

2. Wholesale Customer Treatment (**PA 295 of 2008** Section 35(1)(a)(b)).

3. Renewable Energy Plan Worksheets

- See attached suggested renewable energy plan summary and renewable energy credit summary worksheets

**Michigan Public Service Commission 2008
PA 295 Amended by 2016 PA 342**

**Filing Requirements and Instructions
for Renewable Energy Plans
for Municipally-Owned Electric Utilities**

PA 295 of 2008 Section 22(3) Within 1 year after the effective date of the 2016 amendatory act that added this section, the commission shall review each electric provider's plan pursuant to a filing schedule established by the commission. For an electric provider whose rates are regulated by the commission, the commission shall conduct a contested case hearing on the plan pursuant to the administrative procedures act of 1969, 1969 PA 306, MCL 24.201 to 24.328. After the hearing, the commission shall approve, with any changes consented to by the electric provider, or reject the plan and any amendments to the plan. For all other electric providers, the commission shall provide an opportunity for public comment on the plan. After the applicable opportunity for public comment, the commission shall determine whether any amendment to the plan proposed by the provider complies with this act. For alternative electric suppliers, the commission shall approve, with any changes consented to by the electric provider, or reject any proposed amendments to the plan. For cooperative electric utilities and municipally owned utilities, the proposed amendment is adopted if the commission determines that it complies with this act.

The following suggest elements that address the specific items referenced in previous commission orders as well as previously filed municipal renewable energy plans on what information may be included within a renewable energy plan under **PA 295 of 2008**. These suggestions are intended to be used only as initial guidance. They are not necessarily exhaustive.

1. Sales Forecast through 2029

- Specify whether megawatt hours of electricity used in the calculation is the previous year's weather-normalized retail sales or based on the average number of megawatt hours of electricity sold by the electric provider annually during the previous 3 years to full service retail customers in the state (**PA 295 of 2008** Section 28(1)(i)(ii))

2. Forecast Through the End of Plan Period in 2029 of Meters by Customer Class

- This is needed in order to determine maximum surcharges by customer class (**PA 295 of 2008** Section 45)

3. Quantity of RECs

- Outline the quantity of energy credits the Company forecasts it must obtain each year to meet its RPS (**PA 295 of 2008** Section 28(1))

4. Detailed Resource Plan

- Describe how the Company will meet the RPS including the source of energy credits and the expected timing of when the energy credits will be obtained and used for compliance
- Identify risks which may cause performance to vary

5. Wholesale Customer Treatment

- Only applies if Municipal purchased PURPA capacity (**PA 295 of 2008** Section 35(1)(a)(b))

6. Incremental Cost of Compliance

7. Cost Recovery Mechanism

8. Renewable Energy Plan Worksheets

- See attached suggested renewable energy plan summary and renewable energy credit summary worksheets

RENEWABLE ENERGY PLAN SUMMARY

Row No.		2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
1	Sales and Requirement Calculation														
2	Method: Weather Normalized or 3 Year Average														
3	If Selected Weather Normalized:														
4	Current Year Sales to Retail Customers														
5	Current Year Weather Normalization Factor														
6	Current Year Weather Normalized Sales (Row Number 4 * 5)														
7	If Selected 3 Year Average:														
8	Current Year Retail Sales to Retail Customers														
9	3 Year Average of Retail Sales														
10	RPS Required Energy Credits (For 2017 and 2018 enter the same amount as 2015 requirement in NERCS, for 2019 and 2020 enter 12.5% of row 6 or 9, for 2021 enter 15% of row 6 or 9)														
11	Energy Credits														
12	Energy Credit Beginning Balance														
13	Energy Credits Obtained Through Generation BOT														
14	Energy Credits Obtained Through PPA														
15	Energy Credits Obtained Through REC Purchases														
16	Plus Energy Credit Obtained (Row 13+14+15)														
17	Less Energy Credits Sold														
18	Available Energy Credits (Row 12+16-17)														
19	Compliance Requirement (Row 10)														
20	Less Energy Credit Expiration														
21	Energy Credit Ending Balance (Row 18-19-20)														
22	Revenue Requirement														
23	Cost of Renewable Energy Generation BOT														
24	Cost of Renewable Energy Credit Purchases														
25	Cost of Renewable Energy PPA														
26	Costs of Administration of Renewable Energy Plan														
27	Less Revenue obtained from Renewable Energy Sales (non-retail)														
28	Total Revenue Requirement for Renewable Energy Plan (Row 23+24+25+26-27)														
29	Cost Recovery														
30	Forecasted Transfer Price per MWH														
31	MWH of Renewable Energy														
32	Amount Recovered Through the PSCR (Row 30 * 31)														
33	Incremental Cost of Compliance (Row 28-32)														
34	Non-Volumetric Surcharge Meter (or customer) Forecast														
35	Residential														
36	Secondary														
37	Primary														
38	Total (Row 35+36+37)														
39	Planned Surcharge Revenue														
40	Residential														
41	Secondary														
42	Primary														
43	Total (Row 40+41+42)														
44	Year End Regulatory Liability Balance														
45	Current Year Regulatory Liability Balance (Row 43-44)														
46	Forecasted Ending Balance Prior to Current Year Interest (Row 48 for prior year + Row 45 of current year)														
47	Carrying Charges (Short-term interest)														
48	Total Balance (Row 46 + 47)														

