BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c)	)
Emergency Order: Midcontinent	)
Independent System Operator	)
(MISO)	)
	)

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 161

RTO Insider Feb. 16, 2026 Article

NERC Staff Outline Growing LTRA Challenges

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Attendees at NERC's quarterly technical session in Savannah, Ga. | *© RTO Insider*

Feb 16, 2026 | Holden Mann

SAVANNAH, Ga. — *NERC* Director of Reliability Assessment and System Analysis John Moura acknowledged recent criticism of NERC's Long-Term Reliability Assessment but emphasized the report is "not a prediction of outages [or] a forecast of impending blackouts."

Why This Matters

With NERC's LTRA increasingly cited by lawmakers and regulators, the ERO's staff are working to make sure the assessment's purpose is understood while also making sure their data reflect the state of the grid as best they can.

Speaking at the ERO's quarterly technical session Feb. 12, he also discussed some of the ways the ERO's approach to the assessment is changing in light of ongoing changes to the electric grid.

Moura's remarks came the same week as his appearance, along with NERC CEO Jim Robb, at the Feb. 9 board meeting of the Organization of *MISO* States to discuss objections by OMS members to the ERO's 2025 LTRA, which rated five assessment

regions, including MISO, as having the potential to develop into high risk between 2026 and 2030.

The assessment means that planned resources as of July 2025 would lead to energy shortfalls in excess of resource adequacy targets or baseline criteria for unserved energy or loss of load.

OMS members disputed this label in a letter that argued NERC should have counted resources in MISO's fast-track interconnection queue. The organization argued that the 11 GW of natural gas generation and battery storage proposals to come online by mid-2028 should make up for the 7-GW shortfall projected in the LTRA. (See *MISO States Dispute 'High Risk' Designation from NERC*.)

It was the second time in as many years that MISO objected to NERC's assessment of the region's risk. In 2025 MISO's Independent Market Monitor pointed out that NERC had committed an error in rating the region as high-risk in the previous year's LTRA. After a back-and-forth, NERC agreed to downgrade MISO to "elevated" risk.

At the technical session, Moura explained — as he did at the OMS board meeting — that NERC's deadline for including energy projects passed in mid-July 2025 and MISO's fast-track projects "were only approved in September, [so] were unable to be included in the energy analysis." (See *NERC to OMS: Long-term Assessment not a Predictor of Risk*.) He added that the resources might not have been included in the assessment anyway because of changes to how NERC assesses the impact of generation additions.

"Counting capacity is really a thing of the past. Energy adequacy cannot be determined by counting capacity," Moura said. "These projects weren't left out because we missed them. The issue is really modelability, deliverability and certainty."

Moura explained that modelability refers to whether any constraints could apply to a resource — for example, if a gas generator is coming online without firm gas arrangements — that could make it "difficult or impossible for that new generator to get gas on peak winter days."

Deliverability means the ability of electricity generated in one area to reach load centers in other areas, which Moura observed could be an issue for the 7 GW of fast-track resources "south of the well-known MISO South to MISO North interconnection constraint."

Finally, Moura defined certainty as the assurance that projected resources will be available as expected, an important question "given the supply chain challenges … in our assessments showing delays of up to 50% of planned generation not meeting their in-service dates."

Avoiding Panic

Along with the difficulty assessing new generation, NERC Trustee Ken DeFontes observed that in previous LTRAs, NERC staff have also had problems predicting generation retirements because they "tended to only count retirements that had been announced [when] the reality was … it was likely more were coming." He asked how the team behind the 2025 assessment had accounted for the issue.

Mark Olson, NERC's manager of reliability assessments, replied that the ERO aims to account for both the "certain level of retirements in terms of being announced and in the process to be deactivated, versus a more speculative industry projection of potential retirement." Moura added that NERC also must consider retirements as "a dial that can be turned … where states and other policy makers can take action to keep units online [or] have the ability to throttle those resources."

Karen Onaran, CEO of the Electricity Consumers Resource Council, reminded attendees of the growing influence of NERC's reliability assessments on lawmakers and policy makers, and warned that without proper context the reports could be "used as ammunition [to] saddle consumers with costs that may not be necessary."

"At least within the last couple of years, when these reports come out, [they raise] some panic, and [hurt] some feelings. And we take it, and we try to take the lessons learned and figure it out," Onaran said. She suggested that NERC's Engagement and Outreach Committee, launched in December 2025 to handle external communications, work on a plan for conveying "what this report really says … and what risks it's identifying … to all levels of government and to the industry."

BOTRESOURCE ADEQUACY

KEYWORDSLONG-TERM RELIABILITY ASSESSMENT (LTRA)MIDCONTINENT INDEPENDENT SYSTEM OPERATOR (MISO)NERC BOARD OF TRUSTEESNORTH AMERICAN ELECTRIC RELIABILITY CORP. (NERC)ORGANIZATION OF MISO STATES (OMS)

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HOLDEN MANN

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Exhibit 162

MISO Feb. 4, 2026 Meeting

MISO Advisory Committee
Conference Call
February 4, 2026
10:00 am – 12:10 pm ET / 9:00 am – 11:10 am CT
Dial-in and Webex information available at www.misoenergy.org

Minutes

1. **Administrative Items (Dan Scripps)**
   a. **Welcome/ Roll Call/Public Meeting Announcement/MISO Code of Conduct**
   The meeting was called to order at 10:01 am ET. Roll was taken. The Public Meeting Announcement and MISO Code of Conduct were shared.

   Chair: Dan Scripps
   Vice Chair: Brian Drumm
   MISO Liaison: Carmen Clark
   Stakeholder Relations: Eileen King
   Other MISO support: Amy Thurmond

   Affiliate Sector: Jonathon Fortner
   Competitive Transmission Developers: Jeff Dodd
   Coordinating Member: Ryan Lowe
   End Use Customers: Ken Stark, Kavita Maini
   Environmental: Mike Schowalter Beth Soholt
   IPPs: Tia Elliott, Erin Murphy, Arash Gholston
   Munis/Coops/TDUs: Mitch Myhre, Chris Norton, Luke Peterson
   Power Marketers: John Orr, Seth Cochran
   Public Consumer Advocates: John Liskey, John Crotty
   State Regulatory Authorities: Dan Scripps, Chris Nelson, Sarah Martz, Courney Hjaltman
   Transmission Owners: Brian Drumm, John Wolfram, Susan Rossi

   b. **Review of Agenda**
   The agenda was accepted as posted.

   c. **Review of Meeting Minutes/Action Items**
   Minutes were accepted as posted. All Action Items are closed except the standing Item.

Action Item	Owner	Date	Status
The 2026 AC Roster will be posted with the December 10 meeting materials and on the AC landing page	Stakeholder Relations	12/10/2025	Closed
The 2026 Rotating Agenda Teams will be posted with December 10 meeting materials and the AC landing page.	Stakeholder Relations	12/10/2025	Closed
A request for nominations to serve on the Finance Subcommittee will be sent via email. Nominations will close January 16.	Stakeholder Relations	12/10/2025	Closed
The Stakeholder Governance Guide will be updated and posted on the website.	Stakeholder Relations	12/10/2025	Closed
Comments and suggested edits to the Current Issue questions on Storage are due to Stakeholder Relations by January 9	Members	12/10.2025	Closed

➲ Post Only √ Potential Voting Item ^ Feedback Requested * Verbal Report

Members are asked to submit suggested topics for both Current Issue and Session with the Board to AC Leadership.	Members	9/17/2025	Standing

d. **Legal Report ➲**

2. Status Updates

a. Liaison Report (Carmen Clark)

The following topic was discussed:

- *March Board Reminders – Topic, Registration, Session Attendance Deadlines*

A member inquired about the change of topic for the Session with the Board of Directors. MISO responded that the change of topic from *Federal Policy* was due to the anticipated attendance of FERC Commissioner LaCerte.

b. Main Parent Entity Updates ➲ (MPE Leadership)

c. OMS* (Tricia DeBleeckere)

OMS Executive Director Tricia DeBleeckere shared the 2026 Leadership: Commission Michael Carrigan, President; Commissioner Chris Nelson, Vice President; Commissioner Sarah Martz, At Large; Commissioner Courtney Hjaltman, Secretary and Advisory Committee Representative.

OMS via their Cost Allocation Principles Committee (CAPCOM) and Order 1920 Regional State Entities Group is working on final steps in the Order 1920 state engagement period which ends on March 11.

OMS Members are working through the NERC Long-Term Reliability Assessment (LTRA) with concerns that the report did not include ERAS projects among other issues, OMS will discuss at their February 6 Resource Adequacy Committee and with NERC at their February 9 OMS Board Meeting. Relatedly, OMS has been filing with both the DOE and FERC regarding several 202(c) Emergency Orders, cost allocation methodology for the affected resources, as well as cost recovery.

OMS continues to work on incorporation of information from the OMS-MISO Survey. Comments have been submitted and are posted on the website.

A member inquired regarding how OMS is processing Order 1920 and any documentation available on the topic. Director DeBleeckere shared that the CAPCOM is working on workstreams delegated to states via Order 1920, like backstop ex ante and state agreement processes, as well as continuing to provide input to MISO on requirements that are MISO-led, including voluntary funding mechanisms and general MISO compliance or tariff redlines.

d. Transmission Owners* (Brian Drumm/John Wolfram)

The Transmission Owners, Chair Brian Drumm and Vice Chair John Wolfram shared that the Owners were active participants in MISO's historic Large Load Addition workshop on January 30 and look forward to participating in future quarterly Workshops throughout 2026. The Owners will engage in this initiative via responses to MISO's stakeholder feedback requests and by providing feedback as individual issues are addressed in MISO stakeholder committees throughout 2026.

The Owners continue to be active participants in MISO's Futures Redesign Workshops. The Owners look forward to continued participation in the remaining workshops in 2026 (resuming in February) and assisting in the completion of the Futures Redesign.

e. Steering Committee* (Brian Drumm)

The Steering Committee (SC) Chair Brian Drumm shared that the SC met last on February 3. The Committee approved its 2026 Charter and management plan as well as the Main Parent Entity (MPE) Charters/Management Plans for four MPEs and the SGWG. The Committee also received updates on two Issues. *Transmission Cost Containment (RECBWG-2024-1)* will move to the PAC for further discussion. *Attachment U Retirement from the MISO Tariff (MSC-2025-6)* will move forward with filing. The committee reviewed and approved Sections 1.1.1 and 100.1 of the SGG related to the Nominating Committee for the Advisory Committee (AC). The next meeting is March 25 and will be in person in New Orleans prior to the AC.

3. **March Session with the Board (Carmen Clark)**
The March Session topic will be *Market Development and Transmission Planning in RTOs*. Draft questions should be posted by weeks end. The idea for the topic is a broad comparison with other RTOs with focus on market redefinition, operational risks and transmission. Members were encouraged to share things that are working well during the March discussion. Emma Nicholson, Energy Economist with Charles River Associates will be the guest speaker during the session.

The Chair shared that one of his goals in the role is to improve the Sessions with the Board of Directors while keeping with MISO's framework and make the time valuable for all participants. AC Leadership and MISO have had initial discussions about potential improvements to the Session. MISO shared that they have heard feedback regarding selecting the topic and crafting of the questions and noted that beginning with the June meeting the responsibility will be for the AC members to determine the process, timing, topic and questions going forward.

4. **Current Issue Discussion (IPPs/Environmental Sectors)**
Storage
The discussion continued regarding *Storage*, led by the Environmental and Independent Power Producers Sectors. The discussion highlighted diverse viewpoints on the role of storage within MISO's market framework. Stakeholders emphasized that storage could serve multiple loads and provide flexibility across different roles, offering major opportunities for grid reliability, flexibility, and cost-effectiveness. There is optimism that MISO will view storage as an opportunity rather than a challenge, given its potential to support grid reliability and efficiency. However, current MISO rules and planning processes are not fully aligned with storage's capabilities, creating barriers to value realization. Storage can serve multiple roles, but policy clarity is needed to avoid double counting and ensure cost-effective deployment. Market rules and incentives must evolve to integrate storage effectively; lessons from other RTOs can guide this. Reliability and interconnection studies remain case-specific, with duration differences adding complexity. Storage will be critical for future system needs, supporting inverter-based resources and cost management. Overall, Stakeholders are optimistic but call for clear rules, updated market structures, and collaboration to unlock storage's full potential.

5. Advisory Committee Items (Dan Scripps)

a. **Advisory Committee Charter/Management Plan Review** √
The posted draft AC Charter and Management Plan were reviewed. No additional edits to the Charter were recommended. A motion to approve the Charter and Management Plan was made by John Liskey, Public Consumer Advocates Sector and seconded by Arash Ghodsian, Independent Power Producers Sector. The motion was carried by General Consent. The Charter and Management Plan will be updated with approval date and be posted on the AC page.

b. **Motion to approve Finance Subcommittee (FSC) Representatives**√
There was one nomination for each open position for the below sectors for the 2025 term. A motion was posted with materials to approve all candidates. There was a late nomination from the Public Consumer Advocates Sector not included on the posted motion. The committee agreed to vote on the posted motion with an amendment to include the late nomination. The motion was moved by Arash Ghodsian, Independent Power Producers Sector, and seconded by Kavita Maini, End Use Customer Sector, and carried by General Consent.

An Action Item was captured to update and repost the motion

Motion	Status	Outcome
The Advisory Committee approves the following nominees to serve on the Finance Subcommittee: • Marcel Zettler, Coordinating Member • Tia Elliott, Independent Power Producers • John Liskey, Public Consumer Advocates • Ken Stark, End Use Customers • Tyler Bergman, Environmental	Decided	Motion carried by General Consent

c. **Current Issue Discussion Future Topics**
The list of topic suggestions below was shared. *Interregional Planning and Operations* that would include concepts around minimum transfer capabilities and coordination during grid stress events was suggested by Members and will be the topic introduced at the March meeting by the Environmental and State Regulatory Sectors. The full discussion will be continued at the May meeting. The Chair indicated future outreach regarding additional topics. The following list details topics that have been previously proposed for consideration:

- Minimum Transfer Capability; Inter-tie Optimization
- "Ketchup Caddy" Prevention; avoiding fraud and manipulation in the marketplace
- DLOL Methodology - Future Improvements – Including HVDC
- Resource Adequacy – Including Long Term Reliability Assessment (LTRA)
- Generator Attributes – revisit
- Grid Enhancing Technology
- Wildfire Mitigation Program
- Cost of Tranche 1 and 2 Developer Agreements
- EPA Changes to Long-Term Planning

6. **New Business (All)**
None raised.

7. **Open Comments**
A Stakeholder noted appreciation to the Chair for dedication in looking into how the Session with the Board is defined and how questions are formed. The Stakeholder noted that the Sector he represents has raised concern in the past regarding the process and AC member involvement with the Board.

8. **Recap – Action Items (Eileen King)**

Action Item	Owner	Date	Status
The 2026 AC Charter will be posted on the AC landing page with February 4 approval date.	Stakeholder Relations	2/04/2026	Closed
The Motion for FSC members will be amended to include all nominees and will be reposted	Stakeholder Relations	2/04/2026	Closed
The Environmental and State Regulatory Sectors will draft questions for the Current Issue Discussion kick-off at the March meeting.	Stakeholder Relations	2/04/2026	Closed
Members are asked to submit suggested topics for both Current Issue and Session with the Board to AC Leadership.	Members	9/17/2025	Standing

➲ Post Only √ Potential Voting Item ^ Feedback Requested * Verbal Report

9. Adjournment
   The meeting adjourned at 11:51 am ET.

Rotating Agenda Team March: John Crotty, Arash Ghodsian, Sam Gomberg, John Wolfram, Jim Dauphinais

Next Meeting:
March 25, 2026
New Orleans, LA

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator (MISO)	)))))

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Exhibit 163

OMS Feb. 6, 2026 Meeting

ORGANIZATION OF MISO STATES, INC.
Resource Adequacy Committee
February 6, 2026

DRAFT

Commissioner Marcus Hawkins, Chair of the Organization of MISO States, Inc. (OMS) Resource Adequacy Committee, called the February 6, 2026 meeting to order via Webex at approximately 1:00pm (CT). The following committee members or their proxies participated in the meeting:

Michael T. Carrigan, Illinois
Andy Zay, Indiana
Sarah Martz, Iowa
Justin McNeil, proxy for Mary Pat Regan, Kentucky
Noel Darce, proxy for Eric Skrmetta, Louisiana
Erik Hanser, proxy for Dan Scripps, Michigan
Joseph Sullivan, Minnesota
Bill Booth, proxy for Wayne Carr, Mississippi
Walt Cecil, proxy for John Mitchell, Missouri
Brad Molnar, Montana
David Shaffer, proxy for JP Morrell, New Orleans
Jill Kringstad, North Dakota
Chris Nelson, South Dakota
Werner Roth, proxy for Courtney Hjaltman, Texas
Marcus Hawkins, Wisconsin

Absent
Arkansas
Manitoba

The directors and proxies listed above established the necessary quorum for the meeting of at least nine directors being present.

Others present:
OMS staff and staff participants from individual state commissions
Other meeting attendees
MISO staff

Administrative Items

- Tricia DeBleeckere, OMS Executive Director, took the roll as noted above.

- Approval of Minutes from the October 6, 2025 Resource Adequacy (RA) Committee Meeting.
  The minutes were accepted as submitted.

Business Items

- Resource Adequacy Metrics Next Steps:

  Commissioner Hawkins gave a presentation on the background and status of the Resource Adequacy (RA) Metrics discussion. He reviewed that the committee was originally formed in response to MISO's late-2024 white paper and roadmap on RA metrics, which raised concerns among OMS members because changes to RA metrics is an inherent state role and would effectively change utilities' planning requirements. He noted that MISO and OMS had long relied on the LOLE 1-in-10 standard as the primary RA metric, and that the RA-committee's work was focused on whether additional or alternative metrics (such as loss of load hours or expected unserved energy) might be needed to better capture evolving risks in the MISO footprint. Hawkins emphasized the importance of a gap analysis to determine whether the current framework leaves important risks unmeasured and to inform any future changes in planning criteria and MISO modeling.

  Hawkins then outlined several draft directions OMS might provide to MISO. These included: supporting MISO's continued work to monitor additional metrics alongside LOLE and to use those results to identify emerging risks; emphasizing the need for close coordination with OMS on modeling inputs, assumptions, and interpretation to ensure regulators' confidence in probabilistic results; reaffirming that MISO and OMS share reliability goals but that states retain jurisdiction over RA criteria and thresholds; clarifying expectations for how study results should be shared with OMS and stakeholders; and encouraging MISO to maximize transparency around RA models and data (including the LOLE model that will support upcoming accreditation changes) to avoid a "black box" perception. He also noted that related RA work at MISO, including the newly combined future studies and accreditation analyses, would intersect with these issues in the coming year.

  During discussion, committee members raised the potential of engaging independent third-party expertise to provide an external perspective on MISO's RA metrics and other work, particularly from the standpoint of reliability and consumer cost rather than stakeholder financial interests. Hawkins reported that OMS had already been engaging with national labs, that this topic would feature in the upcoming OMS Resource Adequacy Summit, and OMS had a consultant budget that could be used if members wished to pursue additional expert support, but that would need to be balanced with other needs and uses of that budget item. Members, including Werner Roth, stressed that while MISO should be responsible for analyzing metrics and flagging where they may diverge as the resource mix changes, any decision to establish or modify adequacy criteria based on those metrics must ultimately rest with state regulators. Hawkins proposed that the OMS staff-level working group further develop these ideas into a guidance document for review by this committee and/or the OMS Board, with the goal of providing timely direction to MISO.

- NERC LTRA Report:

  Tricia DeBleeckere and Commissioner Hawkins gave an overview on the most recent NERC Long-Term Reliability Assessment (LTRA) and its implications for the MISO region. DeBleeckere

DRAFT

noted that MISO continues to be shown in “red” in the report, and that OMS has already communicated high-level concerns to NERC via a letter from President Carrigan to CEO Jim Robb. Key issues included that the LTRA did not incorporate ERAS projects into the core modeling for the 2025 assessment window, even though NERC acknowledged that timely ERAS implementation from 2028 onward would eliminate the identified reserve margin shortfall and improve expected unserved energy. Members also discussed NERC’s treatment of projected load and retirements as firm, contrasted with greater uncertainty assigned to new resource additions, and the resulting portrayal of growing risk in the MISO footprint.

The committee then examined specific modeling and translation issues between utility/state planning, MISO’s RA studies, and the NERC LTRA. Hawkins explained that MISO’s seasonal allocation of the 1-in-10 LOLE standard currently concentrates risk in summer and sets winter at a notional 1-in-100 level, meaning the winter gap highlighted by NERC compares actual resources to a very conservative, non-binding reference level and can overstate winter risk. Members also discussed the omission of DOE 202(c) units from the LTRA, the new energy-risk metrics (such as loss of load hours and expected unserved energy), and concerns with how the LTRA is being used in media, DOE filings, and state proceedings. DeBleeckere emphasized that, based on the OMS-MISO survey, utility plans show substantial new resources and emerging/replacement capacity, and that planning realities in a largely vertically integrated, state-regulated footprint need to be more accurately reflected in national assessments. The committee agreed to continue technical engagement with MISO and NERC to refine assumptions, better understand the magnitude of any risks, and align the narrative with what states see in their dockets.

- Open Mic:

  N/A

The meeting concluded at approximately 11:00am (CT).

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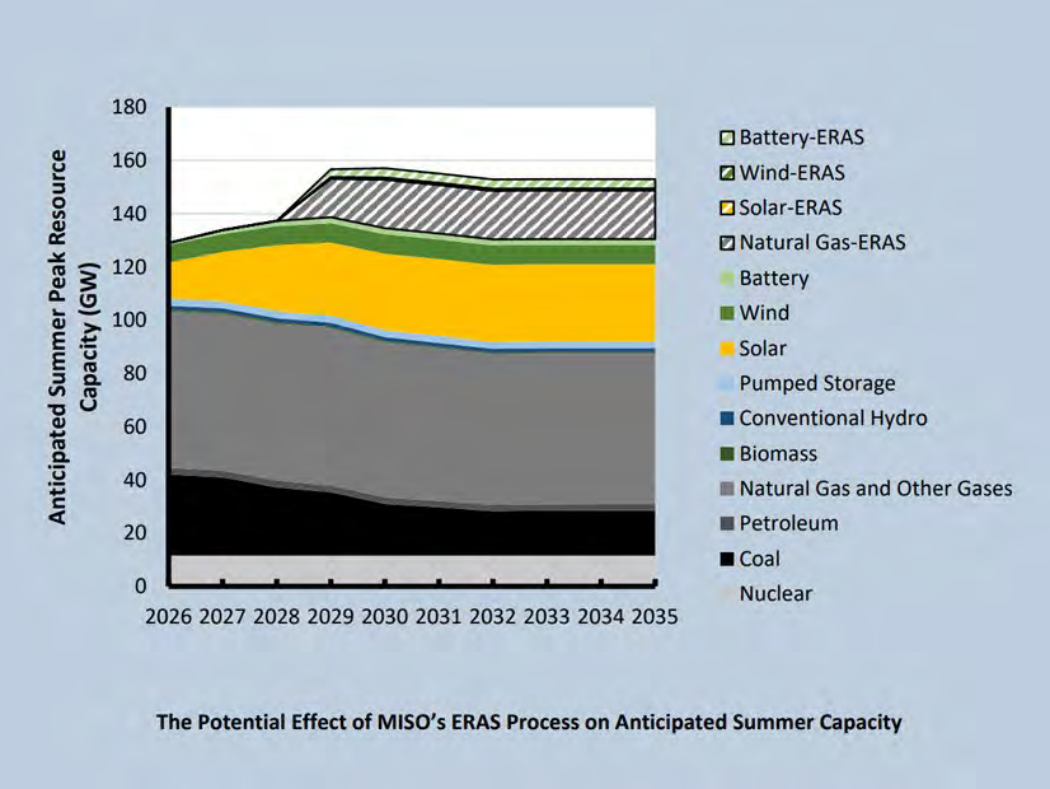
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RTO Insider Feb. 8, 2026 Article

MISO States Dispute 'High Risk' Designation from NERC

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Potential expedited resource additions in MISO beginning in 2027, according to NERC's LTRA | *NERC*

Feb 8, 2026 | Amanda Durish Cook

Members of the Organization of *MISO* States have sent a letter to contradict aspects of *NERC's* Long-Term Reliability Assessment, disputing the ERO's label of MISO as being at "high risk."

The Bottom Line

State regulatory agencies are challenging NERC's Long-Term Reliability Assessment, which rated MISO as "high risk." They say NERC treats planned retirements and load additions as certainties, while replacement generation is branded as uncertain.

State regulators in MISO said NERC should have counted resources in MISO's fast-track interconnection queue in assessment totals.

MISO was branded high risk in the near term by NERC in its *2025 LTRA*, along with *PJM*, *ERCOT* and northern portions of WECC. (See *NERC Warns of 'Worsening' Resource Adequacy Through 2035*.)

Organization of MISO States President Michael Carrigan, of the Illinois Commerce Commission, sent the letter to NERC CEO James Robb on behalf of "several" other OMS member states concerned about MISO's designation in the LTRA. The letter was not considered a statement from the OMS Board of Directors.

Carrigan wrote that MISO's generator express lane — "developed collaboratively by state regulators, MISO and stakeholders" — is well underway, "and it is expected to address emerging capacity needs in the near to medium term."

MISO has more than 11 GW of natural gas generation and battery storage proposals in the first two cycles of its expedited interconnection queue that are set to come online by mid-2028. The grid operator will accept more projects throughout 2026. (See *MISO Accepts 6 GW of Mostly Gas Gen in 2nd Queue Fast Lane Class*.)

At a Feb. 4 MISO Advisory Committee meeting, OMS Executive Director Tricia DeBleeckere said OMS members aired concerns "most importantly because the report did not include" projects in the queue fast lane. She said the expedited generation should neutralize the 7-GW shortfall NERC expects to materialize in winter 2028.

NERC has acknowledged its model didn't include MISO's expedited generation proposals. It said if the projects arrive as promised, a projected reserve margin shortfall "would be eliminated." MISO expects about 8.6 GW more of winter on-peak capacity to reach operation by 2028/29 through the expedited queue.

Per NERC's assessment, MISO is due to experience a net loss in natural gas units by 2030. MISO's queue fast lane is comprised mostly of natural gas-fired additions.

To submit a commentary on this topic, email forum@rtoinsider.com.

'Red' Again

OMS continued to voice dissatisfaction with NERC conclusions at a Feb. 6 meeting dedicated to resource adequacy.

"MISO continues to be red. But we think there's a lot of work in the region … that's changing the trajectory," DeBleeckere said.

She said MISO and members "have concerns over the outputs" and that OMS representatives have been in communication with NERC officials since the release of the assessment.

DeBleeckere said there's a difference between MISO and members carefully crunching reserve margins and "heading toward a stop sign that we're not going to stop at."

She said she understands NERC must impose a cutoff on its data to begin working on the assessment.

“But this was such a big piece for us,” she said of MISO’s formation of the interconnection fast lane.

NERC’s inclusion of a sidebar in the report indicates NERC realizes the generator fast lane will mitigate risk, DeBleeckere added. She said MISO’s largely vertically integrated utility model would not allow “massive amounts of load that is un-resourced.”

OMS is meeting with MISO and NERC representatives to understand “the math that goes into the models that produce these results,” DeBleeckere said. She said NERC’s perceived risk of a shortfall by winter 2028/29 clashes with MISO’s summer-peaking conclusions from loss of load studies and that NERC’s interpretation might be one of an array that could be drawn.

DeBleeckere said there may be a “translation issue” between the way utilities plan their resources and how NERC draws its conclusions.

OMS believes there could be issues with the reference margin levels NERC uses in the LTRA, which assume risk only in summertime. NERC’s winter reference margin levels use a one-event-in-100-years assumption.

MISO uses varying seasonal requirements to account for risks. For the 2026/27 planning year, MISO found a slight loss of load risk in all winter months, leading it to use a 0.014 days/year risk — roughly equivalent to one day in more than 70 years — in its loss of load expectation *study*.

Interestingly, NERC determined MISO would maintain resource sufficiency in summers through 2029, even with an added 10 GW of load growth and a peak demand drifting upward to 138 GW.

Wisconsin Public Service Commissioner Marcus Hawkins said he wanted MISO, members and regulators to focus on the anticipated summertime performance.

“That is wildly impressive in this assessment, so I don’t want this to get lost among the concerns,” Hawkins said.

Bill Booth, a consultant to the Mississippi Public Service Commission, asked how results would be used and which outcomes they could influence.

DeBleeckere said beyond the report “hitting hard” in the press, the U.S. Department of Energy has used NERC assessments to justify keeping generation online in emergency 202(c) orders.

“It also can certainly work its way into state dockets,” Hawkins added.

Booth predicted reacting to the report would involve “damage control.”

‘Already Proactively Addressed’

Meanwhile, Carrigan noted in his letter that most utilities in MISO and state commissions coordinate to anticipate demand growth, retire generation and plan new generation through integrated planning approvals. He said reliability is handled “holistically” in MISO.

“[S]tate regulators, regulated utilities and MISO are actively engaged in identifying and mitigating evolving risks and have well-established tools to do so, as we have been doing for decades. Many risks highlighted in the assessment have already been proactively addressed in the MISO region, for example, by establishment of winter planning requirements,” Carrigan wrote.

Carrigan added that NERC treats planned retirements and load additions as certainties, while replacement generation is branded uncertain until the projects traverse regulatory, interconnection or market prerequisites.

“Utilities and regulators are aware of evolving system needs and have been, and will continue to be, actively engaged in taking corrective planning and regulatory actions to maintain reliability,” Carrigan wrote.

Carrigan said OMS’ well-established resource adequacy survey in conjunction with MISO often predicts shortfalls years down the road, similar to the LTRA. But he said the OMS-MISO survey’s “out-year uncertainty is a structural feature of planning-based jurisdictions and is routinely managed through coordinated utility planning, regulatory oversight and market and policy actions, well before reliability could be affected.”

Carrigan recommended NERC incorporate MISO’s longstanding planning processes and work from its collection of jurisdictions to moderate LTRA results. He said more balanced results could help dodge “disproportionate economic or policy consequences driven by out-year risk signals.”

“In MISO, the balance of state regulatory oversight, utility obligations and market mechanisms is intentionally designed to moderate risk and ensure timely corrective action,” Carrigan wrote.

Southern Renewable Energy Association Executive Director Simon Mahan said NERC’s “maps of doom” aren’t helpful and that MISO’s results in the assessment are “head-scratching.” Mahan said NERC’s inputs are outdated by the time it publishes the report, evidenced by the missing expedited resource additions.

“These maps are already being teed up in legislative hearings, regulatory filings and media articles as justification for: bypassing competitive procurement; fast-tracking utility self-build projects; locking in long-lived fossil investments; and sidelining lower-cost clean energy resources,” Mahan *wrote* in a reaction piece, adding that knock-on effects include rising gas prices and less-thought-out reliability.

“People make decisions based on NERC reports, even if NERC attempts to dissuade just that,” Mahan said.

In 2025, the MISO community similarly found itself at odds over NERC’s risk interpretation in its LTRA. In that case, MISO’s Independent Market Monitor criticized NERC’s conclusion and pointed out an error.

NERC had used unforced capacity values for MISO when calculating a margin that it ultimately compared to an installed capacity requirement. After a back and forth between MISO and NERC, the reliability corporation ultimately downgraded MISO from “high risk” to “elevated risk.” (See *IMM: NERC Reliability Assessment Still Overstating MISO Risk*.)

GENERATION | MRO | ORGANIZATION OF MISO STATES (OMS)PUBLIC POLICYRESOURCE ADEQUACY

KEYWORDSLONG-TERM RELIABILITY ASSESSMENT (LTRA)MIDCONTINENT INDEPENDENT SYSTEM OPERATOR (MISO)NORTH AMERICAN ELECTRIC RELIABILITY CORP. (NERC)ORGANIZATION OF MISO STATES (OMS)SOUTHERN RENEWABLE ENERGY ASSOCIATION (SREA)

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MISO’s 3rd Expedited Queue: 8 GW of Gas and Batteries

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FERC Feb. 19, 2026 Meeting

https://www.youtube.com/watch?v=qYpQq4XWqrI

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MISO ERAS March Release

MISO accelerates resource additions with third ERAS cycle

8 GW of proposed capacity will strengthen reliability and meet growing demand

For Immediate Release

March 9, 2026

Media Contact

McKenzie Barbknecht

CARMEL, Ind. — MISO today announced the third cycle of projects to be evaluated under its Expedited Resource Addition Study (ERAS) process, marking another step toward accelerating the deployment of critical generation resources across the region.

This cycle includes 15 projects totaling approximately 8 gigawatts (GW) of proposed new capacity. The portfolio features a mix of natural gas resources and battery storage spread across MISO's North, Central and South regions. All projects are expected to be in-service by 2031 or earlier.

"Each ERAS cycle helps advance the resources our system needs to reliably serve a growing region," said Aubrey Johnson, Vice President of System Planning. "The interest we continue to see reflects both the urgency and the opportunity to develop a clear, timely path to interconnection, and ERAS is helping us provide that in the near term."

Since the program launched, 53 projects representing nearly 27 GW of proposed capacity have been accepted or are pending validation into ERAS. Ten have already advanced to completed generator interconnection agreements, with an additional 15 projects nearing completion. There is a program cap of 68 projects before ERAS sunsets on August 31, 2027.

"ERAS is one piece of a broader strategy to improve the speed and certainty of our generator interconnection queue," Johnson added. "We're making steady progress toward a more efficient process for our members and the communities that rely on them."

To date, MISO has studied more than 11 GW of proposed capacity through its ERAS process.

###

MEDIA CONTACT:
McKenzie Barbknecht

About MISO

Midcontinent Independent System Operator (MISO) is an independent, not-for-profit organization that delivers safe, cost-effective electric power across 15 U.S. states and the Canadian province of Manitoba. 45 million people depend on MISO to generate and transmit the right amount of electricity every minute of every day. MISO is committed to reliable, nondiscriminatory operation of the bulk power transmission system and collaborating with all stakeholders to create cost-effective and innovative solutions for our changing industry. MISO operates one of the world's largest energy markets with more than $22 billion in annual gross market energy transactions.

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RTO Insider Mar. 10, 2026 Article

MISO's 3rd Expedited Queue: 8 GW of Gas and Batteries

Listen to this story



Work on a BESS facility in Coldwater, Mich., in 2025 | *Motor City Electric Utilities*

Mar 10, 2026 | Amanda Durish Cook

MISO announced a third, 8-GW cycle of generation projects to enter its fast-tracked interconnection process, its largest cluster yet.

Why This Matters

Natural gas dominated once again in MISO's third cluster of generation projects for its expedited queue processing. Though gas took a 6-GW share of the total 8 GW of proposals, individual storage projects outnumbered gas plans.

MISO's expedited interconnection queue continued its theme of a high proportion of thermal resources, with gas plants *outnumbering* storage facilities on a capacity basis 5.8 GW to 2.2 GW. Storage accounted for eight entries, while gas submittals took the remaining seven slots.

In its second 15-count queue class, gas also tipped the scales and accounted for 4.3 GW of the 6-GW group. (See *MISO Accepts 6 GW of Mostly Gas Gen in 2nd Queue Fast Lane Class*.)

The grid operator said it expects this collection of projects to be in service no later than 2031.

This batch of expedited interconnections includes Northern Indiana Public Services Co.'s coal-to-gas transition at its R.M. Schahfer Generating Station. NIPSCO submitted two combined-cycle plants totaling 2,639 MW. NIPSCO cited its 2024 integrated resource plan to back up the need for the plants, which was developed before the U.S. Department of Energy stepped in to prevent the Schahfer plant from retiring as planned at the end of 2025.

The Schahfer plant is on emergency stay-open orders through March 23. So far, DOE hasn't let any of its 90-day operating extensions lapse, issuing a chain of orders before the last has a chance to expire. Schahfer also needs expensive, time-consuming repairs before the plant's Unit 18 can function. (See *Enviros Warn NIPSCO Against Rebuilding Coal Unit on DOE Emergency Order*.)

NIPSCO also put forward 500 MW of battery storage at its Mitchell site in Gary, Ind. NIPSCO said both the Schahfer gas plants and Mitchell battery storage "are necessary for resource adequacy to serve growing data center, advanced manufacturing and other economic development project load requirements."

Xcel Energy, DTE Electric, NextEra Energy, Swift Energy Storage, Hackett Energy Storage and Brickyard Energy Storage also submitted battery facility plans ranging from 100 to 300 MW in Michigan, Minnesota and Indiana.

Xcel Energy's plans included its Sherco South BESS project, part of the utility's *planned* Sherco Energy Hub in central Minnesota, which reimagines the site around the coal-fired Sherburne County Generating Plant (Sherco) into a solar and storage format. Xcel closed Sherco Unit 2 in 2023 and plans to idle units 1 and 3 in 2026 and 2030, respectively.

Gas plans, on the other hand, involve one of Entergy Louisiana's three plants to serve the sprawling Meta data center in Richland Parish, a 478-MW plan from Entergy Texas, and Basin Electric Power Cooperative's 250-MW turbine in South Dakota.

Gas submittals from Alliant Energy subsidiaries Interstate Power and Light Co. for a 750-MW plant in north-central Iowa and Wisconsin Power and Light Co. for a 150-MW turbine addition in eastern Wisconsin also made the cut.

"The interest we continue to see reflects both the urgency and the opportunity to develop a clear, timely path to interconnection, and [the Expedited Resource Addition Study] is helping us provide that in the near term," Vice President of System Planning Aubrey Johnson said of the batch of applicants.

MISO said that, to date, its queue fast lane has attracted 53 applicants representing almost 27 GW of nameplate capacity, which the RTO has either agreed to study or awaits approval.

The RTO said it has completed studies on more than 11 GW of proposed capacity and the developers behind the first 10 projects already have struck generator interconnection agreements.

MISO's temporary queue express lane is capped at 68 projects, and MISO said it will entertain the last project submissions through mid-2027 before the process winds down on Aug. 31, 2027, if not sooner.

Johnson said the queue fast lane is part of MISO's larger work to get its regular interconnection queue unstuck and pick up the pace on achieving a one-year processing timeline.

Express Lane Dropouts

Developers have withdrawn eight projects since the fast-tracked interconnection lane opened in 2025.

The most recent projects to drop off are two NextEra battery storage projects in Hoosier Energy's territory. NextEra withdrew its 275-MW Sandcut and 400-MW Merom four-hour storage projects in mid-February. They were meant to serve a Solvenz data center.

NextEra also shelved its expedited request for its restart of the Duane Arnold nuclear plant in Iowa. The plant is set to rumble back to life by early 2029. Google signed a 25-year deal to buy power from the plant in October 2025. By November 2025, NextEra withdrew its fast-track request, though *plans* to restart the plant remain.

Alliant Energy's Interstate Power and Light Co. also scrapped its request for expedited processing on a planned, 950-MW natural gas plant near Duane Arnold in November.

MISO confirmed to *RTO Insider* that any projects it lists as "withdrawn" were withdrawn by their respective developers.

The RTO also said it allows other developers to take the place of withdrawn projects only if it can be done quickly. The grid operator said it doesn't backfill fast lane spots if the developer doesn't withdraw its project before it begins its round of studies.

BATTERY ELECTRIC STORAGEMISONATURAL GASPUBLIC POLICYRESOURCE ADEQUACYTRANSMISSION PLANNING

KEYWORDSALLIANT ENERGYBASIN ELECTRIC POWER COOPERATIVEBRICKYARD ENERGY STORAGEDTE ENERGYENTERGY CORP.ENTERGY LOUISIANAENTERGY TEXASEXPEDITED RESOURCE ADDITION STUDY (ERAS)GENERATOR INTERCONNECTION AGREEMENT (GIA)GENERATOR INTERCONNECTION QUEUEGOOGLEHACKETT ENERGY STORAGEINTERSTATE POWER AND LIGHTMETAMIDCONTINENT INDEPENDENT SYSTEM OPERATOR (MISO)NEXTERA ENERGY (NYSE: NEE)NORTHERN INDIANA PUBLIC SERVICE CO. (NIPSCO)R.M. SCHAHFER GENERATING STATIONSHERBURNE COUNTY GENERATING PLANTSOLVENZSWIFT ENERGY STORAGEWISCONSIN POWER AND LIGHT CO.XCEL ENERGY (XE)

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Data Center Dynamics Aug. 5, 2025 Article

Michigan utility Consumers Energy to provide 1GW of power to new hyperscale data center

Backs new electricity rate for large power users

August 05, 2025 By: Zachary Skidmore Have your say

Michigan utility Consumers Energy (CMS) is set to provide 1GW of new power load to a planned hyperscale data center.

"The data center agreement is a big win and reflects progress in our growth as well as the opportunity to invest in new renewable and thermal resources," Consumers Energy CEO Garrick Rochow said in the company's Q2 earnings call.

The data center developer and the exact location of the site were not disclosed, but it will be located within the utility's Lower Peninsula service territory.

According to a spokesperson, the new data center load will increase into the 2030s, providing the utility with time to plan for any new capacity that may be needed to power the data center.

Commenting on future data center growth across the utility's service territory, Rochow said: "We continue to see positive momentum with data centers within the 9GW pipeline and expect additional progress once we finalize the data center tariff."



– Getty Images

CMS is in the process of requesting approval of a special electricity rate for large power users from the Michigan Public Service Commission. The goal of the tariff is to prevent cost-shifting to avoid other ratepayers footing the bill for serving large new power loads.

CMS currently has a $5 billion capital expenditure forecast, along with two percent to three percent sales growth, in its Integrated Resource Plan (IRP). It expects to revise those targets upwards to meet growing demand for power in Michigan, especially as data center growth in the state increases.

Consumers Energy provides services to most of Michigan, supplying power to more than 6.7 million people. Their coverage spans all 68 counties in the Lower Peninsula and extends into sections of the Upper Peninsula.

Michigan is fast becoming a hotbed of data center activity. Last week, DTE Energy – which serves 2.3 million customers across Michigan – reported in its Q2 earnings that it was in talks with data centers representing up to 7GW of new capacity in Michigan, with 3GW in advanced discussions.

At present, Switch is the largest player in the state, with 365, Bedrock, and Sentinum also present. In November 2024, Switch announced intentions to expand its data center in Grand Rapids, Michigan.

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mLive Mar. 12, 2026 Article

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NEWS

Consumers Energy wants to build 2 new gas power plants, scale up clean energy

Published: Mar. 12, 2026, 8:30 a.m.

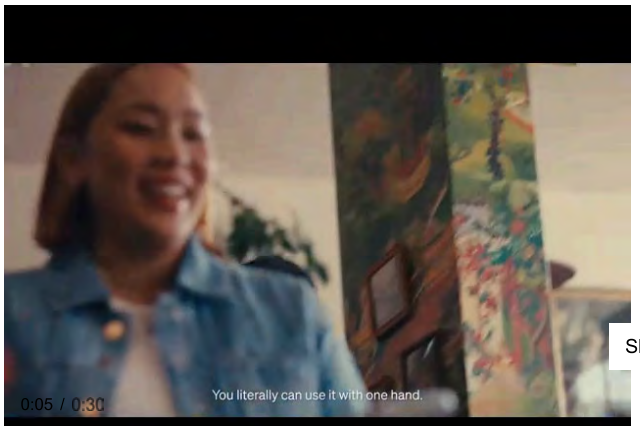


A view of the Consumers Energy Karn Generating Complex on the Saginaw River in Bay County, Mich. on Friday, April 10, 2020 in an MLive file photo. Consumers has retired coal-burning units at the site and announced on Wednesday, March 11, 2026 it will propose a new natural gas-fired power plant on the land in Hampton Township. Kaytie Boomer | MLive.com

By Lucas Smolcic Larson | lsmolciclarson@mlive.com

JACKSON, MI - Later this year, Consumers Energy will pitch state regulators on a plan to build two new power plants burning natural gas along with substantial new wind, solar and grid-scale battery facilities in Michigan.

The state's second largest electric utility anticipates rising power demand as it courts megaprojects like artificial intelligence data centers and new manufacturing.



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The new gas plants, one in Bay County and one in Genesee County, plus the slew of renewable energy projects, will be part of a power supply roadmap filed with regulators in June, the utility announced Wednesday, March 11.

Details of the proposed projects, like cost and anticipated timelines, remain slim at this point.

Its upcoming "integrated resource plan" including the power plants will require approval from the Michigan Public Service Commission, the three-member body appointed by the governor to regulate utilities.

It will almost certainly face legal scrutiny from environmental groups, business interests and consumer advocates when filed.

But the Wednesday announcement is the first hint of big new energy projects near Bay City and Flint.

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Consumers said one of the new gas plants would be built at the site of its Karn generating facility in Bay County's Hampton Township, where the Saginaw River meets the Saginaw Bay and Lake Huron.



The remnants of the Consumers Energy Weadock Plant were demolished with explosives on Saturday, Aug. 29, 2020 in Hampton Township north of Bay City. The coal-fired plant had been decommissioned in 2016, and previously produced electricity for about 300,000 households from 1940 to 2016. Consumers is now considering the site for a grid-scale battery storage project. (Jake May | MLive.com) Jake May | Mlive.com

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The power company, headquartered in Jackson, has decommissioned coal-burning units at Karn and the adjacent Weadock generating site, and has already proposed a $70 million utility-scale battery project there.

One local leader, Hampton Township Supervisor Terri Close, celebrated the Wednesday announcement, saying it will strengthen the local economy and provide reliable energy across Michigan while taking advantage of existing power infrastructure.

The utility's grid covers much of the Lower Peninsula, with the exception of the Thumb and the southeastern part of the state around Detroit.

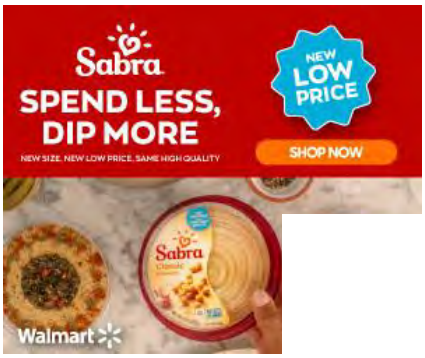
Consumers proposes a second gas plant in Genesee County's Thetford Township, north of Flint.

In 2012, the utility announced its intention to build a power plant in the township on the land off North Genesee Road but ultimately backed off the plan some two years later.



In this MLive file photo, Dennis Dobbs, then-Consumers Energy vice president of generation engineering and services, speaks to the media in 2012 at the Thetford Township hall about plans for a $750 million power plant in the township. Consumers ultimately put the plans on hold and purchased an existing plant in Jackson. Ryan Garza | MLive.com

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Combined, the gas plants would provide 1.5 gigawatts of power supply capacity, similar to that of a large nuclear plant and capable of serving hundreds of thousands of homes.

Michigan law requires utilities to meet 100% clean energy standards by 2040. Natural gas is a fossil fuel composed primarily of methane, a potent greenhouse gas. It normally isn't considered clean.

But gas plants can count toward the law's requirement if they come with carbon capture and storage systems operating with at least 90% effectiveness.

Consumers spokesperson Katie Carey said in a statement the utility is not currently planning to add that technology to the plants.

“These fast-start natural gas resources are designed to run only when the system needs support, such as during periods of high demand or when renewable generation is limited," she said. “Because they operate for short periods and provide peaking support, adding carbon capture does not provide meaningful customer or system value at this time.”

Consumers touts the plan as bringing thousands of construction jobs to the state, in addition to new permanent positions, while expanding the tax base in local communities by $19 million with the plants and planned renewable energy development.

It will propose “expanded” wind farms, solar arrays and batteries totaling more than 13 gigawatts, the utility said, though it didn’t detail proposed locations.

The plans will likely face scrutiny from ratepayer advocates, since customers pay for investments in new power generation over time through rates, while also covering profit for utility shareholders who put up the capital for the projects.

The integrated resource plan will pass through a “contested case” process before the Public Service Commission, a formal legal proceeding that allows outside groups to submit testimony and mount arguments to regulators about how it should be modified.

It’s difficult to say much based solely on Consumers’ limited announcement, but the numbers in it imply the utility is “planning for fairly substantial load growth such as might be expected from a couple of large data centers,” said Amy Bandyk, executive director of the ratepayer advocacy group Citizens Utility Board of Michigan in an email.

Utility executives reported in February they were making “great progress” on potential deals to serve data centers, warehouses full of servers powering AI and cloud computing systems that can draw more power than entire cities.

The utility has not announced specific large-scale data center customers, but has received approval for a special rate structure aimed at sheltering its other customers from the sizeable costs to serve the facilities.

It has a pipeline of roughly 9 gigawatts of demand from potential data centers and manufacturing projects, its executives say.

If realized, the development could more than double its peak electric demand on its Lower Peninsula grid. However, the projects are not guaranteed to come to fruition.

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Lucas Smolcic Larson

Lucas Smolcic Larson is a reporter on MLive's investigative team, with a focus on energy and Michigan's utilities. His work has been honored by press associations in Rhode Island, South Carolina and Michigan....more

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(MISO)	)
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Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 170

UtilityDive article on MISO fasttrack interconnection study

UTILITY DIVE

MISO begins reviewing 6.1 GW — 70% of it gas — in fast-track interconnection study

The grid operator's Expedited Resource Addition Study process has grown to 11.2 GW, with an additional 18 GW seeking to join the initiative.

Published Dec. 2, 2025



Ethan Howland
Senior Reporter

The 620-MW, gas-fired Fox Energy Center, owned by Wisconsin Public Service, in Wrightstown, Wis. The Midcontinent Independent System Operator is studying 4.1 GW in gas-fired projects in its latest fast-track interconnection review process cycle, the grid operator said on Dec. 1, 2025. The image by chaddavis.photography is licensed under CC BY-SA 2.0

About 6.1 GW of potential projects have entered into the Midcontinent Independent System Operator's fast-track interconnection review process' second cycle, bringing the total capacity under review to about 11.2 GW, the grid operator said Monday.

Gas-fired generation in the Expedited Resource Addition Study's second study cycle totals 4.3 GW, or 70% of the total capacity in the cycle, according to a summary of the pending ERAS projects. Battery projects totaled 800 MW in network interconnection capacity, followed by wind projects at 580 MW and solar at 475 MW.

"Cycle 2 builds on the momentum of Cycle 1 and reflects the continued demand for timely, reliable interconnection solutions," Aubrey Johnson, MISO's vice president of system planning, said in

a news release. “These projects are essential to meeting near-term reliability needs and ensuring new resource additions are online to meet load growth.”

Three Cycle 1 projects have executed generator interconnection agreements and MISO said it expects the seven remaining projects in the cycle will complete interconnection agreements this month.

MISO said it has accepted or is reviewing 51 projects totaling almost 30 GW into ERAS, which aims to bring power supplies online quickly to meet near-term grid needs. The process allows planned resources that meet eligibility criteria to sidestep MISO’s standard interconnection queue reviews.

Under the ERAS process, MISO is studying up to 15 projects per quarter on a first-come, first-served basis. MISO will study up to 68 projects before the program ends on Aug. 31, 2027.

Last month, public interest groups sued to overturn the Federal Energy Regulatory Commission approval of MISO’s fast-track interconnection review program, along with that of the Southwest Power Pool, arguing in part that they give the reviewed projects an unfair advantage over projects in the grid operators’ standard interconnection queues.

MISO fast-track queue grows to 11.2 GW

Gas-fired generation makes up most of the capacity in the ERAS review process.

Interconnection Customer	Request Status	State	Study Cycle	Summer MW	
Alliant Energy / IPL	Active	IA	1	798 MW	
Alliant Energy / IPL	Active	IA	1	360 MW	
Alliant Energy / WPL	Active	MN	2	162 MW	
Ameren Missouri	Active	MO	2	258 MW	
Ameren Missouri	Active	MO	1	310 MW	
Benton Solar II	Active	MN	2	106 MW	
DTE Electric	Active	MI	2	432 MW	
DTE Electric	Active	MI	2	180 MW	
DTE Electric	Active	MI	2	213 MW	
Entergy Louisiana	Active	LA	2	478 MW	
Entergy Louisiana	Done	LA	1	1,640 MW	
Entergy Mississippi	Active	MS	2	820 MW	
Entergy Mississippi	Active	MS	2	820 MW	
Entergy Texas	Active	TX	2	820 MW	
Indiana Municipal Power Agency	Active	IN	2	268 MW	
Invenergy Cannon Falls	Active	MN	2	428 MW	
Invenergy Clean Power Dev.	Active	WI	2	1,211 MW	
Lincoln Capital Land	Active	IL	1	128 MW	
MidAmerican Energy	Active	IA	1	265 MW	
Minn. Municipal Power Agency	Done	MN	1	394 MW	
Minnesota Power	Active	MN	1	87 MW	

~~Minnesota Power~~	~~Active~~	~~MN~~	~~1~~	~~87 MW~~
NextEra Energy Resources	Active	LA	2	208 MW
Otter Tail Power	Active	MN	1	91 MW
Red Butte Wind	Active	ND	2	457 MW
Red Oak Ridge Energy Center	Done	WI	1	1,211 MW