

# Clearinghouse Rule 98-174

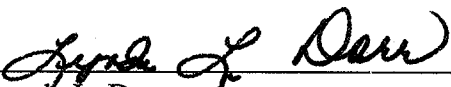
## CERTIFICATE

STATE OF WISCONSIN )  
 ) ss.:  
PUBLIC SERVICE COMMISSION )

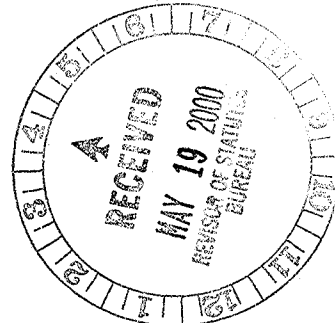
I, Lynda L. Dorr, Secretary to the Commission and custodian of the official records, certify that the annexed rules, relating to the creation of rules governing the ownership, control, or operation of non-regulated wholesale merchant plants in the state of Wisconsin (docket 1-AC-174), were duly approved and adopted by this Commission on May 16, 2000.

I further certify that this copy has been compared by me with the original on file in this Commission and that it is a true copy of the original, and of the whole of the original.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the official seal of the Wisconsin Public Service Commission at Madison, Wisconsin, this 17<sup>th</sup> day of May, 2000.

  
\_\_\_\_\_  
Lynda L. Dorr  
Secretary to the Commission  
Wisconsin Public Service Commission

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98-174  
8/1

**ORDER OF THE STATE OF WISCONSIN  
PUBLIC SERVICE COMMISSION ADOPTING RULES**

- 1 The Public Service Commission of Wisconsin proposes an order to repeal and recreate
- 2 ch. PSC 100 (title), and to create ss. PSC 100.11, 100.12, 100.13, 100.14, 100.15, 100.16, and
- 3 100.17, relating to wholesale merchant plants.

**Analysis Prepared by the Public Service Commission of Wisconsin**

Statutory authority: ss. 196.02(3), 196.491(3m), and 227.11, Stats.  
Statute interpreted: ss. 196.52, 196.491, and 196.795, Stats.

1997 Wisconsin Act 204 (Act 204), created statutes governing the building and operating of non-regulated wholesale merchant plants in the state of Wisconsin. Under the newly created statutes, the Commission must make a finding that the ownership, control, or operation of a wholesale merchant plant affiliated with a public utility will not have a substantial anticompetitive effect on the electricity markets for any classes of customers, prior to approval of the plant. The proposed rules address the approval process.

The rules will: (1) describe the conditions that an applicant is required to meet for the Commission to grant approval to own, control, or operate a wholesale merchant plant; (2) establish screening tests and safe harbors for proposed wholesale merchant plant projects, including projects in which an affiliated interest is a passive investor and over which the affiliated interest is not able to exercise control or influence, and projects in which the affiliated interest's ownership interest is less than 5 percent; (3) describe the Commission's analytical process in making its determination and the factors it uses in making its finding; and (4) allow an interested person to request a hearing on an application under s. 227.42, Stats.



1 **SECTION 1.** Chapter PSC 100 (title) is repealed and recreated to read:

2 **CHAPTER PSC 100**

3 **AFFILIATIONS BETWEEN PUBLIC UTILITIES AND OTHER PERSONS**

4 **SUBCHAPTER I, GENERAL**

5 **SECTION 2.** Subchapter II (title) of Chapter PSC 100 is created to read:

6 **SUBCHAPTER II, AFFILIATED WHOLESALE MERCHANT PLANT**

7 **MARKET POWER**

8 **SECTION 3.** PSC 100.11 is created to read:

9 **PSC 100.11 Purpose.** The purpose of this subchapter is to effectuate and implement

10 s. 196.491(3m), Stats., as enacted by 1997 Wisconsin Act 204, generally effective May 12, 1998.

11 The rules promulgated in this subchapter establish requirements and procedures to be applied to

12 the ownership, control, or operation of an affiliated wholesale merchant plant.

13 **SECTION 4.** PSC 100.12 is created to read:

14 **PSC 100.12 Definitions.** In this subchapter:

15 (1) "Affiliated interest" has the meaning set forth in s. 196.52(1), Stats.

16 (2) "Affiliates" means the public utilities with which the applicant is affiliated and all  
17 other affiliated interests of the public utilities.

18 (3) "Applicant" means any affiliated interest of a public utility seeking approval under  
19 s. 196.491(3m), Stats., to own, operate, or control a wholesale merchant plant.

20 (4) "Available economic capacity" means economic capacity less the amount of  
21 generating capacity reasonably necessary to serve, in commercially viable increments, the  
22 potential supplier's native load.

1 (5) "DOJ guidelines" means the U.S. Department of Justice and Federal Trade  
2 Commission Horizontal Merger Guidelines, as revised April 8, 1997.

3 (6) "Economic capacity" means the amount of generating capacity owned or controlled  
4 by a potential supplier with variable costs low enough that energy from the capacity could be  
5 delivered to the relevant geographic market at a price no more than 5 percent above the  
6 pre-transaction market clearing price; less any capacity that is committed under long-term firm  
7 sales contracts; plus any capacity that is acquired under long-term firm purchase contracts, and  
8 any generating capacity that is under the operational control of a third-party but the potential  
9 supplier receives the economic benefit of the capacity. In this subsection, a long-term sales or  
10 purchase contract means a sales or purchase contract which has a remaining commitment of  
11 more than one year.

12 (7) "FERC Order 592" means the December 18, 1996, Federal Energy Regulatory  
13 Commission Order 592.

14 (8) "HHI statistic" means the Herfindahl-Hirschman Index for the market.

15 (9) "Market power" means the ability of a seller in the relevant geographic market to  
16 profitably maintain prices for comparable products above competitive levels for a significant  
17 period of time. Sellers with market power also may be able to reduce product quality, quantity,  
18 service, or innovation.

19 (10) "Native load" means load attributable to customers on whose behalf the potential  
20 supplier, by statute, franchise, or regulatory requirement, has undertaken an obligation to  
21 construct and operate its system to meet their electricity needs.

22 (11) "Passive investor" is any applicant whose investment the commission determines  
23 does not permit control or influence by the affiliated utility of the merchant plant and who

1 receives no more information regarding plant operations, and who receives such information no  
2 earlier, than is publicly available to any investor. In making a determination whether an investor  
3 may exercise control or influence over a wholesale merchant plant, the commission shall  
4 consider, where applicable, such factors as the fiduciary responsibilities of the operator, manager  
5 and other investors in the wholesale merchant plant to the investor; the ability of the wholesale  
6 merchant plant to raise capital independently of the investor; the ability of the wholesale  
7 merchant plant to make investment and financing decisions independently of the investor;  
8 governance provisions; the number, identity and interests of other investors; if the investor may  
9 exert control or influence over generation rates, terms, conditions and production, including  
10 outage schedules; any services that will be provided by the investor or its employees to the  
11 wholesale merchant plant; the terms of any agreements between the investor and the wholesale  
12 merchant plant, any party managing or operating the wholesale merchant plant, any other  
13 investor or lender in the wholesale merchant plant or any purchaser of output from the plant; and  
14 any other factors which the commission deems relevant.

15 An ownership interest of 5% or less shall be irrebuttably presumed not to create  
16 the ability to control or influence. An ownership interest of 50% or more shall be irrebuttably  
17 presumed to create the ability to control or influence. The ability of investors that loan funds to  
18 the merchant plant to control or influence shall be judged upon the terms of the loan agreements  
19 and the other factors listed above.

20 A passive investor must undertake and propose to the commission processes for a  
21 compliance audit by the commission to ensure the independence of the decision making process  
22 of the wholesale merchant plant from the passive investor and the continued status of the  
23 investor as passive. The first compliance audit will be required two years after initial approval

1 under sec. 196.491(3m), Stats., and as necessary thereafter. The compliance audit information  
2 must be submitted to the commission without any requirement for approval by the wholesale  
3 merchant plant.

4 A passive investor must immediately report changes to the commission in the  
5 ownership, operation, management or control of the wholesale merchant plant that may affect the  
6 status of the investor as passive.

7 (12) "Total capacity" means the total amount of installed electric generating capacity,  
8 measured in megawatts, with respective seasonal ratings.

9 (13) "Wholesale merchant peaker plant" means any wholesale merchant plant  
10 anticipated to have an annual capacity factor of less than 10 percent.

11 (14) "Wholesale merchant plant" has the meaning set forth in s. 196.491(1)(w), Stats.

12 **Note:** Copies of the DOJ guidelines and FERC Order 592 can be obtained by writing to  
13 the Public Service Commission of Wisconsin, P.O. Box 7854, Madison, WI 53707-7854.

14 Copies are on file at the offices of the Public Service Commission of Wisconsin, the Secretary of  
15 State, and the Revisor of Statutes.

16 **SECTION 5.** PSC 100.13 is created to read:

17 **PSC 100.13 Approval requirements.** (1) The commission shall grant the approval  
18 required under s. 196.491(3m)(a), Stats., necessary for an affiliated interest of a public utility to  
19 own, operate, or control a wholesale merchant plant if pars. (a) and (b) are met.

20 (a) The applicant's public utility affiliates have done any of the following:

21 1. Transferred control over their transmission facilities, as defined in s. 196.485(1)(h),  
22 Stats., to an independent system operator, as defined in s. 196.485(1)(d), Stats., that is approved  
23 by the federal energy regulatory commission.

1           2. Divested their interest in the transmission facilities to an independent transmission  
2 owner, as defined in s. 196.485(1)(dm), Stats.

3           (b) The commission has determined that any of the following, which constitutes a  
4 finding that the ownership, control, or operation will not have a substantial anticompetitive effect  
5 on electricity markets for any classes of customers, has been met. For purposes of subd. 1.  
6 and 2., the DOJ guidelines shall be applied as if the proposed merchant plant existed in the  
7 market and was merging with the public utility or affiliate.

8           1. The ownership, operation, or control of the wholesale merchant plant will meet the  
9 appropriate horizontal market power safe harbor provisions in the DOJ guidelines and the  
10 commission has approved any contracts or agreements, as may be necessary under ss. 196.52 and  
11 196.795, Stats., provided, however, that the commission has examined the issues in section 2 of  
12 the DOJ guidelines. An appropriate horizontal market power safe harbor exists if either an HHI  
13 statistic no higher than 1,000 or an increase in the HHI statistic of no more than 50 occurs in the  
14 market power screen analysis as a result of the operation of the affiliated wholesale merchant  
15 power plant.

16           2. The ownership, operation, or control of the wholesale merchant plant will have  
17 minimal potential for adverse competitive effects as defined in section 1.51, "General Standards"  
18 of the DOJ guidelines and the commission has approved any contracts or agreements, as may be  
19 necessary under ss. 196.52 and 196.795, Stats., provided, however, that the commission has  
20 examined the potential for adverse competitive effects as defined in section 2 of the DOJ  
21 guidelines. There is a minimal potential for adverse competitive effects when both an HHI  
22 statistic no higher than 1,800 and an increase in the HHI statistic of no more than 100 occurs in

1 the market power screen analysis as a result of the operation of the affiliated wholesale merchant  
2 power plant.

3 3. The conditions for s. PSC 100.16 safe harbor exceptions are met and the commission  
4 has approved any contracts or agreements, as may be necessary under ss. 196.52 and 196.795,  
5 Stats. Approval of any application, based on a commission finding of safe harbor exception  
6 under s. PSC 100.16, shall be conditioned upon the continued applicability of the safe harbor  
7 conditions.

8 (2) The commission may approve a request by an affiliated interest of a public utility to  
9 own, operate, or control a wholesale merchant plant in which a properly constructed market  
10 power screen analysis, as set forth in s. PSC 100.15, and supporting analyses indicates a  
11 moderate or high potential for adverse competitive effects as defined in section 1.51, "General  
12 Standards" of the DOJ guidelines upon holding a public hearing at which a showing is made that  
13 the significant potential and concern for adverse competitive effects can be overcome by any of  
14 the following. The DOJ guidelines shall be applied as if the proposed merchant plant existed in  
15 the market and was merging with the public utility or affiliate:

16 (a) An appropriate showing of factors as set forth in sections 2, 3, and 5 of the DOJ  
17 guidelines, provided, however, that the commission has examined the potential for adverse  
18 competitive effects as defined in section 2 of the DOJ guidelines.

19 (b) Sufficient mitigation remedies proposed by either the applicant or other parties to the  
20 hearing which are acceptable to the commission. In conditionally approving an application, the  
21 commission shall establish any mitigation remedies as deemed in the public interest and may  
22 consider those mitigation remedies as identified in the hearing record or Appendix A Section D,  
23 "Remedy" of the FERC Order 592.



1 (3) The commission may include in its order granting its approval to own, control or  
2 operate a wholesale merchant plant, any reporting requirements or conditions which it deems  
3 necessary to carry out its jurisdiction under ch. 196, Stats.

4 (4) An applicant may request that the commission issue a declaratory ruling to determine  
5 whether the applicant's proposed ownership, control or operation of a wholesale merchant plant  
6 will have a substantial anti-competitive effect on electricity markets for any classes of customers  
7 and whether the mitigation remedies proposed by the applicant or other parties effectively  
8 mitigate such anti-competitive effects. The application shall describe the proposed wholesale  
9 merchant plant, including the mitigation remedies, in sufficient detail to permit the commission  
10 to determine whether the proposed mitigation remedies effectively mitigate any such anti-  
11 competitive effects. The commission shall have the right to obtain any additional information or  
12 data which it deems necessary under this section. The commission shall, after notice and the  
13 opportunity for interested persons to submit comments, issue a declaratory ruling no earlier than  
14 45 days and no later than 60 days from the date that the commission has determined that the  
15 application is complete.

16 **SECTION 6.** PSC 100.14 is created to read:

17 **PSC 100.14 Approval procedure.** (1) **APPLICATION.** An applicant making  
18 application for approval under s. 196.491(3m)(a), Stats., shall file a market power screen  
19 analysis, as set forth in s. PSC 100.15, no later than the date on which it files its application for a  
20 certificate of public convenience and necessity under s. 196.491(3)(a), Stats.

21 (2) **HEARINGS ON PROPOSALS TO OWN, OPERATE, OR CONTROL A**  
22 **WHOLESALE MERCHANT PLANT.** The commission may waive a hearing on the proposal  
23 unless any of the following occurs:

1 (a) A party to the proceeding, as defined in s. PSC 2.02, files a written request for a  
2 hearing, pursuant to s. 227.42, Stats., within 10 days of the issuance of a notice of investigation  
3 regarding an application of an affiliated interest to own, operate, or control a wholesale merchant  
4 plant.

5 (b) The applicant requests a hearing as required under s. PSC 100.13(2) for commission  
6 approval.

7 (3) APPROVAL. The commission shall approve or disapprove the applicant's request  
8 no later than the earlier of the date it issues or denies a certificate of public convenience and  
9 necessity under s. 196.491(3)(a), Stats., or 150 days after the commission determines that the  
10 market power screen analysis was complete. In the event the wholesale merchant plant is  
11 exempt from requiring a certificate of public convenience and necessity, the commission shall  
12 approve or disapprove the applicant's request no later than 150 days after determining that the  
13 market power screen analysis was complete.

14 **SECTION 7.** PSC 100.15 is created to read:

15 **PSC 100.15 Market power screen analysis.** (1) Except as provided for in sub. (2), an  
16 applicant shall submit a market power screen analysis, which shall provide, at minimum, all of  
17 the following information:

18 (a) *Relevant products.* Using the principles of analysis outlined in the DOJ guidelines;  
19 the information shall identify and define all relevant electricity products sold by the applicant  
20 and its affiliates. Those relevant products which are good substitutes from the buyer's  
21 perspective shall be grouped together. An initial grouping of wholesale products may consist of  
22 non-firm energy, short-term capacity, and long-term capacity with a contractual commitment of  
23 more than one year. However, other capacity and energy groupings reflecting developments in

1 an evolving wholesale market are acceptable as long as the groupings are reasonable or simply  
2 mirror the state of art in product packaging. The information provided shall identify the relevant  
3 products by relevant hourly, daily, monthly, and seasonal time periods. If there are substantial  
4 variations in demand and supply of capacity or energy between time periods, then load supply  
5 and demand conditions shall be analyzed separately.

6 (b) *Relevant geographic markets.* Using the principles of analysis outlined in the DOJ  
7 guidelines, the information shall identify the relevant geographic markets which shall include  
8 each power sales customer or set of customers plausibly affected by the proposed construction.  
9 Affected customers are those entities directly interconnected to the applicant or any of its  
10 affiliates, as well as those entities that have purchased relevant electricity products from the  
11 applicant or any of its affiliates during the two years prior to the date of filing. Identification of  
12 relevant geographic markets shall factor in appropriate transmission capabilities and constraints.  
13 In addition, the relevant geographic markets shall include any markets formally identified by the  
14 commission or the federal energy regulatory commission.

15 (c) *Potential suppliers.* A supplier may be included in a geographic market only to the  
16 extent that it can economically and physically deliver relevant electricity products to the relevant  
17 geographic market, taking into consideration appropriate transmission capabilities, fees, rights,  
18 reservations, tariffs, and constraints. The information shall include, for the relevant geographic  
19 market, the amount of relevant electricity product a potential supplier could deliver to the  
20 relevant geographic market from owned or controlled capacity at a price, including all costs  
21 associated with making physical delivery over the electrical transmission system as well as  
22 ancillary services costs, that is no more than 5 percent above the pre-transaction market clearing  
23 price in the relevant geographic market. The information shall measure each potential supplier's

1 presence in the relevant geographic market in terms of generating capacity, using economic  
2 capacity, available economic capacity, and total capacity measures. In addition, the information  
3 shall measure, where possible, each potential supplier's presence in the relevant geographic  
4 market in terms of electrical energy sold or expected to be sold.

5 (d) *Market concentration.* The information shall include all of the following for each  
6 relevant electricity product in the relevant geographic market, based on the generating capacity  
7 determined in par. (c):

- 8 1. the market share, both pre- and post-construction, for each potential supplier.
- 9 2. the HHI statistic for the market.
- 10 3. the change in the HHI statistic.

11 (e) *Forward looking analysis.* The market power screen analysis shall generally be  
12 forward looking and reflect all known, important developments with respect to electric industry  
13 restructuring, and electric generation and transmission construction or operation. The market  
14 power screen analysis shall examine the first five years of commercial in-service for the  
15 proposed electric generating facility and address whether applicant's proposed ownership,  
16 control or operation of a wholesale merchant plant will have a substantial anti-competitive effect  
17 on relevant electricity markets that are reasonably anticipated to exist for any class of customers,  
18 including those with market-based rates under s. 196.192, Stats. Any such forward-looking  
19 analysis shall not preclude the commission from mitigating retail market power or otherwise  
20 addressing retail market power in the future in connection with the introduction of competition in  
21 the retail market.

1 (f) *Historical data.* The information shall include historical trade data and historical  
2 transmission data for the applicant and all of its affiliates for the two-year period preceding the  
3 filing of the application.

4 (g) *Regulatory filings.* The information shall include all material filed with the federal  
5 energy regulatory commission related to any issue of market power associated with an  
6 applicant's proposal to own, operate, or control a wholesale merchant plant.

7 (h) *Supplemental data or analysis.* The information may include any additional data or  
8 analysis, as long as the additional information accords with the principles of market power  
9 analysis, identification, and interpretation contained in the DOJ guidelines.

10 (i) *Source of data.* In constructing the market power screen analysis, the applicant shall  
11 use the sources of data as outlined in Appendix B of FERC Order 592.

12 (2) An affiliated interest may forgo filing a market power screen analysis if any of the  
13 safe harbor exceptions in s. PSC 100.16 are met, or if it proposes mitigation remedies which  
14 effectively mitigate any substantial anti-competitive effect on electricity markets for any class of  
15 customer, as provided in s. PSC 100.13(4). The applicant shall file documentation and data  
16 supporting the applicable safe harbor exemption or proposed mitigation remedies in lieu of the  
17 market power screen analysis. The applicability of the safe harbor exemption is left with the  
18 commission.

19 (3)(a) The commission shall use the DOJ guidelines when measuring the extent of  
20 market power, or analyzing the potential for adverse competitive effects, of any proposal of an  
21 affiliated interest of a public utility to own, operate, or control a wholesale merchant plant,  
22 pursuant to s. 196.491(3m), Stats. In addition, the commission may consider the extent to which

1 timely, effective entry into the relevant wholesale generation market can mitigate market power  
2 concerns.

3 (b) Any market power screen analysis shall analyze concentration as if a merger of the  
4 proposed plant and the existing generation owner occurred after construction of the proposed  
5 plant, shall aggregate ownership of a public utility and all its affiliates, and shall aggregate  
6 successive construction by public utilities and their affiliates for a period covering no more than  
7 three years.

8 (c) The commission may waive information requirements after providing interested  
9 parties the opportunity to provide comments. In addition, the commission may require the  
10 applicant to supplement the data filed under this subchapter by submitting additional  
11 information, as needed to evaluate the market power screen analysis, applicable safe harbor  
12 exemptions, or proposed mitigation remedies.

13 **SECTION 8.** PSC 100.16 is created to read:

14 **PSC 100.16 Bright line safe harbors.** Any of the following bright line safe harbors are  
15 available to affiliated wholesale merchant plants and are subject to all provisions of  
16 ss. 196.491(3m)(c) and 196.52, Stats.

17 (1) The applicant is a passive investor in the wholesale merchant plant. The applicant  
18 and its affiliates do not participate in the decisions regarding the operation of the plant.

19 (2) The applicant's and its affiliates' combined ownership interest is less than 5 percent.

20 (3) The affiliated wholesale merchant plant facility has a capacity of less than 20  
21 megawatts. This safe harbor may be elected only once per calendar year in aggregate for all  
22 affiliated interests of a public utility, irrespective of multiple affiliated interests or combinations.

1 (4) The commission shall have the right to obtain any information or data which it deems  
2 necessary in order to exercise its authority under this section.

3 **SECTION 9.** PSC 100.17 is created to read:

4 **PSC 100.17 Affiliated electric sales.** (1) For purposes of this subsection:

5 (a) "Electric sale" has the meaning set forth in s. 196.491 (3m)(c)1.a., Stats.

6 (b) "Firm sale" has the meaning set forth in s. 196.491 (3m)(c)1.b., Stats.

7 (2) An applicant may not make any firm sale to a public utility with which it is affiliated,  
8 if any of the following applies:

9 (a) The firm sale is for a period of 3 years or more.

10 (b) The firm sale is for a period of less than 3 years and either party to the sale has an  
11 option to extend the period to 3 or more years.

12 (3) The commission shall review all electric sale transactions by any affiliate to any  
13 affiliated public utility of electricity generated at a wholesale merchant plant owned, operated, or  
14 controlled by an affiliate of the purchasing public utility. Commission approval of all contracts  
15 and agreements for public utility affiliate electric sales to an affiliated public utility are required  
16 prior to initiation of sales.

17 (4)(a) If at any time the commission finds that the electric sale is not in the public  
18 interest or if the commission finds that the purchasing public utility failed to provide the contract  
19 to the commission, the commission shall do at least one of the following:

20 1. Disallow the public utility's costs related to the sales in a rate-setting proceeding.

21 2. Order the public utility to provide a refund, in an amount determined by the  
22 commission, to its customers.







# Public Service Commission of Wisconsin

Ave M. Bie, Chairperson  
Joseph P. Mettner, Commissioner  
John H. Farrow, Commissioner

610 North Whitney Way  
P.O. Box 7854  
Madison, WI 53707-7854

The Honorable Douglas LaFollette  
Secretary of State  
30 West Mifflin Street, 10th Floor  
Madison, WI 53703

Mr. Gary L. Poulson, Deputy Revisor  
Revisor of Statutes Bureau  
131 West Wilson Street, Room 800  
Madison, WI 53703-3233

Re: In the Matter of Proposed Revision of Chapter PSC 100, Wis. Adm. Code – Rules for Wholesale Merchant Plants 1-AC-174

Dear Secretary LaFollette and Mr. Poulson:

At its open meeting on May 16, 2000, the Commission approved an order adopting rules to amend ch. PSC 100, Wis. Adm. Code. Pursuant to s. 227.20, Stats., an agency is required to file a certified copy of each rule it promulgates with the offices of the Secretary of State and the Revisor of Statutes.

Enclosed for filing are certified copies of the Order of the State of Wisconsin Public Service Commission Adopting Rules, to amend ch. PSC 100, Wis. Adm. Code.


Mr. Poulson's filing also includes a 3.5" diskette containing an electronic copy of the proposed rules.

Secretary of State LaFollette's filing includes a copy of the U.S. Department of Justice and Federal Trade Commission Horizontal Merger Guidelines, as revised April 8, 1997, and the December 18, 1996, Federal Energy Regulatory Commission Order 592. Consent to incorporated by reference these documents into the rules was granted on April 12, 1999.

If you have any questions or concerns, please contact Mr. Leon M. Swerin, Assistant General Counsel, (608) 267-3589.

Dated at Madison, Wisconsin, May 17, 2000

By the Commission:

  
Lynda L. Dorr  
Secretary to the Commission

LLD:LJH:ljb:l:\Rulemaking\1-AC-174 Final Submittal -Secretary of State

Enclosures

cc: Records Management, PSCW  
Service List

