

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter, on the Commission’s own motion, )  
to commence a collaborative to consider issues ) Case No. U-20959  
related to the further engagement, education, and )  
participation of utility customers. )  
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At the September 8, 2022 meeting of the Michigan Public Service Commission in Lansing,  
Michigan.

PRESENT: Hon. Daniel C. Scripps, Chair  
Hon. Tremaine L. Phillips, Commissioner  
Hon. Katherine L. Peretick, Commissioner

**ORDER**

Background

The October 17, 2019 order in Case No. U-20645 (October 17 order) launched MI Power Grid in partnership with Governor Gretchen Whitmer, and intended the initiative to provide the Commission, the Staff, and stakeholders with a multi-year vehicle “to maximize the benefits of the transition to clean distributed energy resources for Michigan residents and businesses.” October 17 order, p. 1. MI Power Grid aspires “to engage utility customers and other stakeholders to help integrate new clean energy technologies and optimize grid investments for reliable, affordable electricity service,” and including “outreach and education, as well as changes to utility regulation designed to advance Michigan’s clean energy future.” *Id.*

On February 18, 2021, the Commission issued an order in this docket (February 18 order) launching the Customer Education and Participation workgroup (CE&P workgroup or workgroup) as part of Phase

III of MI Power Grid, to integrate the Customer Data Access section of the Data Access & Privacy workgroup into the CE&P workgroup, and to provide guidance to the Commission Staff (Staff) and stakeholders regarding the Commission’s objectives and expectations for this effort. The Commission issued the February 18 order in agreement with, and to bring to fruition, the recommendations contained in the Staff’s October 15, 2020 MI Power Grid Status Report. *See*, MI Power Grid Status Report, Case No. U-20645, filing #U-20645-0004, p. ii. The February 18 order directed the Staff to provide a report to the Commission on CE&P workgroup activities not later than February 25, 2022. February 18 order, p. 9.

As set forth in the February 18 order:

The Commission’s October 17 order described the MI Power Grid objective of *Customer Engagement* as “[p]roviding Michigan residents and businesses with the energy technologies, programs, and price signals that will allow customers to be more active and effective participants in the state’s transition to increased clean and distributed energy resources.” The Commission also described this corresponding work area:

**Customer education and participation**, including educating customers on new utility and non-utility offerings and involving all customers (residential, commercial, and industrial) in developing programs in order to ensure customers fully benefit from these new offerings.

*Id.*, pp. 1-2, citing October 17 order, p. 6, (emphasis in original).

The Commission acknowledges that “Michigan’s energy system is undergoing a fundamental shift ‘from large, central-station power plants to cleaner and more distributed energy resources such as wind and solar energy.’” February 18 order, p. 2, quoting October 17 order, p. 2. Further, the Commission acknowledges that this transition will require “deployments of supply-side wind, solar, and other generating resources” and “necessitate[s] the considerable engagement of customers and deployment of demand-side resources.” February 18 order, pp. 2-3.

Increasingly, energy customers will be relied upon to not only be passive recipients of electrons and grid services, but active, engaged, and dependable participants integral to supporting the energy ecosystem. Customer engagement, participation, and adoption of energy waste reduction (EWR) and demand response (DR) programs, time-of-use rates,

distributed energy resources (DERs), and other demand-side measures will be an essential component to ensuring that this transition maximizes the benefits for all ratepayers while ensuring the reliability of the energy system.

*Id.*, p. 3.

Acknowledging “the increasing role utility customers will play in the energy transition when establishing the Customer Engagement work area of the MI Power Grid initiative” and “the importance of access to energy data and information in order to fully leverage the participation of customers and enabling the availability of demand-side resources,” the Commission found that incorporation of

the Customer Data Access & Privacy topic into the Customer Education and Participation workgroup [would] allow the Staff to more thoroughly assess and provide recommendations to the Commission on how providing safe access to customer energy data, and balancing the availability of that data with customer privacy, can contribute to the energy systems’ transition to clean DERs.

*Id.*

The February 18 order noted that “several emerging developments have spurred Commission activity related to the Customer Education and Participation workgroup.” *Id.* The Commission intended that the Staff would “convene customers, utilities, third-party demand-side technology and service providers, community-based organizations, and other stakeholders” (*id.*, p. 6) to examine the following developments to discern context and learnings that may inform the workgroup’s recommendations to the Commission: (1) response to the COVID-19 pandemic; (2) the Commission’s 2021-2025 Strategic Plan; (3) the Commission’s diversity, equity, and inclusion efforts; (4) the Commission’s outreach to Michigan’s Tribal communities; and (5) customer data access. *See, id.*, pp. 3-6.

Further, the Commission directed the Staff to:

focus on ways to better connect and communicate the availability of customer-facing programs and resources, whether offered by the Commission, utilities, or other third parties, to Michigan’s ratepayers [and to explore] best practices to outreach more effectively and create pathways for all customers to participate in demand-side programs, services, and technologies that are key components to the success of the ongoing energy

transition. Such programs, services, and technologies may include, but are not limited to, EWR, DR, DERs, and innovative rate offerings.

*Id.*, p. 6. Additionally, the Commission directed the Staff to “engage in discussions and profile other state public utility commissions to identify ways to improve customer knowledge and understanding of, and involvement in, Commission activities.” *Id.*, p. 7.

Lastly, the Commission directed the Staff to continue to engage with utilities and other stakeholders to encourage and support the dedication of resources and the education of one another in order to gain knowledge and understanding of (and to collectively lessen) the challenges and systemic inequalities that customers in underserved and historically marginalized communities face when interacting with the energy system. *Id.*

As discussed above, a report on the CE&P workgroup’s activities, progress, and achievements was due February 25, 2022. Prior to the due date of the report, the Commission and the Staff involved in the CE&P workgroup were in agreement that an extension of the deadline for the report was in the public interest and would further the goals summarized above and set forth in detail in the February 18 order. Accordingly, the Commission found that the CE&P workgroup report deadline should be extended to March 25, 2022.

#### March 25, 2022 MI Power Grid Status Report

On March 25, 2022, the CE&P workgroup<sup>1</sup> filed its MI Power Grid Status report (March 25 report or report), setting forth a detailed accounting of the activities, insights, learnings, and recommendations of the workgroup, and providing the information under two general headings: (1) Customer Access and Data Privacy, and (2) Customer Education and Participation. *See*, March 25 report, Contents. The report contains a great wealth of information that will not be repeated here. The Commission

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<sup>1</sup> A list of the Staff and organizations that participated in the workgroup is included in the March 25 report.

encourages interested persons to examine the report and to explore the extensive resources relied upon by the CE&P workgroup in preparing the report.

The March 25 report notes that “[t]he CE&P workgroup consisted of four stakeholder sessions: the first two focusing on customer data access and privacy topics, and the remaining two focusing on CE&P topics.” March 25 report, p. 3. The first stakeholder session addressed the evolution of data collection by utilities and included demonstrations by DTE Energy Company (DTE) and Consumers Energy Company (Consumers) of ways for customers to access their data. Also in the first session, there were two panel discussions that explored the regulatory barriers and enhancements to customer usage data access, the first of which “presented academic and community focused perspectives,” while the second panel discussion “addressed third-party installer and service provider perspectives.” *Id.*

The second stakeholder meeting focused on data privacy, data sharing, and customer consent for data sharing, and

featured presentations explaining the current data privacy tariffs and billing rules in Michigan; the lifecycle of data at Consumers Energy and DTE; national lessons learned and best practices for protecting data privacy, sharing customer data, and customer consent for sharing such data; and similarities and differences, as well as regulatory opportunities and barriers of aggregated and anonymized data. This session also featured a panel on “Data Aggregation and Anonymization: Methodologies and Best Practices[.]”

*Id.*

During the third stakeholder meeting, the Staff shared the Commission’s engagement process and opportunities for, and barriers to, customer education, participation, and outreach, and gave demonstrations of the Commission’s Customer Shutoff Data Portal. “This session highlighted two panels: one on ‘Barriers to Customer Participation in Commission Related Activities’, and the other on ‘Successes in Customer Education, Outreach, and Engagement.’” *Id.*

The fourth stakeholder meeting included:

[a] level-setting discussion focused on the importance of equitable outreach and access to energy programs and technologies, and the impact that inequitable engagement has on customers and communities. This session featured a presentation from [the] Staff on the [the Commission's] Diversity, Equity, and Inclusion (DEI) Policy and Regulation Subcommittee. This workgroup session also featured two panels: one on Customer Engagement and Access from a utility perspective, and another on Intentional Outreach and Engagement from a community and advocacy organization perspective.

*Id.*, pp. 3-4.

#### 1. Customer Access and Data Privacy Activities and Learnings

For purposes of the workgroup, “data access” was defined as “a person’s ability to obtain energy data from a utility database.” *Id.*, p. 4. The report states that “[i]n the past, energy data has only been provided to customers on an aggregated monthly basis through a utility bill.” The report goes on to state that:

[a]dvancements in technology such as the deployment of advanced metering infrastructure (AMI) and supervisory control and data acquisition (SCADA) have significantly changed the type and amount of data utility companies’ store. Near real-time availability of data is also a possibility as energy usage is now being collected hourly as opposed to monthly for many Michigan customers. Access to this data has the potential to help a variety of different users better understand usage patterns and make empowered and educated energy decisions.

*Id.*

The March 25 report continues that the ability to access appropriate data is of far less use to customers if the data is not portable, i.e., unless it may be exchanged with energy providers of the customer’s choice. Jurisdictions outside Michigan have addressed data access and portability in different ways. For example, “California has established that consumers have a right to receive data from their meter and share it with third parties of their choice” through the Green Button standard.<sup>2</sup> *Id.*,

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<sup>2</sup> Green Button technology “allows customers to download their electric and natural gas AMI data by utilizing the ‘Green Button Download My Data’ application. Customers can also share electric and natural gas AMI data directly with a third-party by utilizing the ‘Green Button Connect My Data’ application (Graham, 2021).” March 25 report, p. 5.

p. 5. The Canadian province of Ontario has mandated the implementation of Green Button for some Ontario electric and natural gas utilities. *Id.*

While Michigan has not mandated the adoption of the Green Button standard for investor-owned utilities, Consumers has adopted the Green Button Download My Data and Green Button Connect My Data (Green Button Connect) applications, while Indiana Michigan Power has adopted the Green Button Download My Data application. DTE has developed a proprietary application that may be employed by both electric and natural gas customers to download their energy usage data for a period of up to 12 months and allow those customers to share this data with third parties of the customer's choice via a customer-provided link. DTE also employs an application, Insight App, which provides customers with real-time access to energy usage data, including usage by the customers' appliances and smart devices, and offers energy-saving tips. *Id.*, pp. 5-6.

The March 25 report indicates that, while Green Button and similar technologies are a step in the right direction, "it is necessary to mention barriers experienced by users such as delays in receiving energy data, incorrect data transmitted, unplanned system outages, and lack of consistency in file format between data access platforms." *Id.*, p. 6. The report also indicates that it is important for applications to be user-friendly, and be readily accessible through a mobile device, and that "[i]t is beneficial to have consistent and standardized data formats across regulated utilities." *Id.* (citation omitted). The report further emphasizes the importance of interoperability and the adoption of consensus industry standards for energy data access by customers and third parties, and "[w]hile utility proprietary solutions can be functional, such solutions can significantly limit customer access to increased offerings of third-party energy services and education that have been built or are being developed from the Green Button Standard." *Id.*, p. 36. The report offers examples of solutions to some of these issues that other

jurisdictions have tried, such as in Texas where the existence of a centralized or single point-of-entry that is compatible with several utilities provides a superior data access and sharing experience. *Id.*

The March 25 report sets forth internationally accepted privacy standards:

The Fair Information Practice Principles (FIPPS), developed by the United States government in 1973, are a result of the U.S. Federal Trade Commission's inquiry into how entities collect and use personal information and ways to ensure fairness and privacy protection. The FIPPS include notice/awareness, choice/consent, access/participation, integrity/security, and enforcement/redress (Murray, 2021). The FIPPS are a widely recognized privacy framework used in laws in many US states as well as other nations and international organizations.

In 1980, using the 1973 FIPPs as a core framework, the Organization for Economic Cooperation and Development (OECD) proposed privacy guidelines that included eight principles. These principles are:

- Collection Limitation
- Data Quality
- Purpose Specification
- Use Limitation
- Security Safeguards
- Openness
- Individual Participation, and
- Accountability

These OECD guidelines are the version most cited in subsequent years.

In 2013, the OECD issued "The OECD Privacy Framework", a document of revised guidelines due to changes in the role of personal data in the economy, society, and our daily lives. The revisions did not amend the eight principles, but new concepts were added, and aspects of the 1980 guidelines were expanded or updated, considering the evolution that took place between 1980 and 2013 in international privacy activities, privacy laws, and privacy policies.

*Id.*, pp. 7-8.

The March 25 report discusses the importance of authenticating the identity of a person seeking access and the scope of authorization the person holds before permitting access to data and posits that:

it is best to have multiple ways to perform identification, so it is convenient for the customer. This can occur online and include different options such as account number or, if unknown, determining the account number by phone number, email address, mailing address, or a one-time passcode to a telephone number or email address. Authorization is



important for customer protection, so they are aware of the scope of access being granted. When a customer is providing authorization, best practices suggest it is important to have all the information on one screen, limit excessive scrolling, require no zooming, and be mobile friendly. These screens for authorization should be approved by the Commission as an unbiased third-party and will ensure proper balance between privacy and usability.

*Id.*, p. 10 (citation omitted).

Importantly, the report finds that it is possible and desirable to allow third parties to have access to appropriate, aggregated or anonymized, and non-personally identifiable customer data without customer consent in ways that enhance public welfare. Currently, organizations and companies across many different sectors access or desire to have access to data that has been aggregated and/or anonymized. The report indicates that it is essential to ensure customer privacy under such circumstances and goes on to discuss that:

[t]here are three factors that can impact whether aggregation methodology is sufficient. These three factors are the amount of data being sought, time interval of data being sought such as 1- minute, 15-minute, or 1-year, and the geography of the data being sought including city block, zip code, city, or state. It is important to note that the variety of aggregation models are determined by customer class and aggregation screens can be different based on use case. For example, more access could be given to local governments and academic research because they serve the greater good of the public by developing public policies.

*Id.*, p. 11.

The report also includes a discussion of the differential privacy approach to the release of aggregated or anonymized and non-personally identifiable data to third parties without customer consent. “Differential privacy is a mathematical technique that introduces noise to a data set to enhance application of risk-based assessment and maintain customer confidentiality. This method investigates how we are assessing risk, the tradeoff of usability of data, and the risk of reidentification.” *Id.*

The report asserts that:

[d]ataset repositories are helpful to house aggregated energy related data that would be accessible to customers, third-party service providers and installers, academia, and local governments, etc. The data can be used to assist in energy savings, clean energy goals,

research, and technological advances. Data would be aggregated based on the proper screen to ensure customer privacy.

*Id.*, p. 12. One example of a data repository is the Big Energy Data Center developed in Illinois that provides energy usage data by time and/or zip code. *Id.*

The report further discusses the approaches taken by some jurisdictions outside Michigan to provide appropriate security while sharing aggregated and anonymized data with third parties without customer consent and includes discussion of the approaches used by California, Colorado, Illinois, New Hampshire, and New York, as well as discussion of opinions and ideas from other stakeholders such as third-party service providers and installers, academia, governmental organizations, and subject matter experts. *Id.*, pp. 13-17.

The report emphasizes that, whatever method of sharing aggregated and non-personally identifiable customer data to third parties is developed or adopted, jurisdictions must carefully weigh the benefits of ease of access by third parties against the provision of appropriate protections for customers. Jurisdictions should also be aware of the most recent technological advances that may affect or negate prior acceptable methods of data collection and sharing. Protection of individual, identifiable customer data is paramount when developing and/or adopting data storing and sharing methodologies and technologies. *Id.*, pp 10-12.

Also, a matter of concern is that, regardless of the method of storage and sharing, third parties need to conveniently access data that is useful for their purpose. Some utilities or municipalities report that they have difficulty aggregating the extensive data that is gathered by AMI or that the process for doing so is time consuming and costly. Third-party researchers, as well as utilities themselves, may find that they require a level of differentiated data that is not available to the specificity or granularity required or that there may be no protocol or process to obtain said data. As mentioned above, the use of incompatible and/or non-standardized data formats by utility companies and the lack of availability of

real time data may impede customer participation and decision making about their energy use, as well as hamper research and policy making related to the implementation of electric vehicle, time-of-use and demand response programs, management of load and demand, weather emergencies, wire-down response times, and other important energy concerns. *Id.*, pp. 17-19.

The report provides discussions of potential solutions to some of the above issues. For example, submetering<sup>3</sup> is becoming a more common method of obtaining granular energy usage data; however, the submeters are often not the property of the utility. Another solution may be to allow for access to data over longer periods of time, as customers may derive further benefits from having access to energy data during the previous 24- or 36-month period as opposed to the common practice of limiting data access to only the previous 12 months. In addition, the report suggests that a jurisdiction may institute a higher level of security than is, perhaps, necessary and that represents an obstacle to those who have legitimate purpose to obtain customer data. *Id.*, pp. 19-21.

The CE&P workgroup also continues to be encouraged by the prospect of leveraging the Home Area Network (HAN) technology to extend energy saving technologies and services to customers in historically underserved and marginalized communities:

HAN is a network inside the home that facilitates monitoring and control over energy usage. It provides utilities, utility customers, and authorized third-party service providers with a platform to establish two-way communications on consumers' premises. HAN functions as a network enabling Smart Meter connectivity with household devices like displays, load control devices, and smart appliances. The software application monitors and controls these networks. The HAN option can provide marginalized customers, and low-income and vulnerable communities the ability to obtain data access due to current services falling short. Outreach and services are sometimes lacking for vulnerable and low-income customers. HAN provides the ability to empower customers with energy saving options and closes the gap of problems associated with obtaining data.

*Id.*, p. 18.

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<sup>3</sup> A submeter is a device installed downstream from the utility's meter that is designed to measure and monitor energy usage for a particular load.

## 2. Customer Education and Participation Activities and Learnings

The March 25 report explains that encouraging customer education and participation is a complex and challenging concept that poses many barriers but, with successful efforts, may result in worthwhile benefits for customers, utilities, and regulators. It is important that regulators and utilities effectively address customer education and participation in the provision of utility services and that customer input not be thought of as an add-on. Customers should have avenues that are not overly challenging, complex, or technical, to not only learn about service offerings, but to also offer meaningful input into utility rates, energy pilots and programs, and other related matters. *Id.*, pp. 38-40, 41.

Currently, many regulatory processes do not generally provide extensive opportunities for customer participation. For example, formal, contested proceedings before the Commission, such as rate cases, tend to be technically and statutorily complex with limited opportunities for intervention for the typical utility customer. Even should a typical utility customer follow a regulatory proceeding, the case may involve hundreds – even thousands - of exhibits, pages of expert witness testimony, and arguments. It is a formidable task for an attorney and far more so for a typical customer of the utility. *Id.* Further, “[e]ngagement in regulatory debates and understanding utility filings or other submissions to regulators may be difficult for customers who do not have the time or knowledge of regulatory issues or regulatory language that would enable them to participate in the process more easily.” *Id.*, p. 40 (note omitted). Additionally, underserved and vulnerable populations may be under-represented among those consumer organizations who do participate. Finally, there is a danger of those organizations and viewpoints with the means, expertise, and capacity to formally participate having a disproportionate influence on policy making and regulation. *Id.*

The CE&P workgroup notes that:

it is important to develop and maintain trust with [community-based] organizations and communities, which is built through high quality engagement. Engagement requires an

opportunity to influence decision making. Some research even suggests that regulatory commissions not engage with customers if they “cannot guarantee that the contribution of customers or their representative will make a difference.” In this context, it is imperative that expectations be managed and that regulators be clear about what is meant by “engagement” and that all involved understand “the difference between informing, consulting, involving, collaborating, and empowering.”

*Id.*, p. 41 (notes omitted).

Effective customer engagement should occur early in the regulatory process, with efforts made to reach customers who have been historically provided the fewest opportunities and highest barriers to participation. Another important component of customer engagement is that avenues to provide input be accessible and visible, including utilities and regulators having a physical presence in the community, or through use of digital platforms and video conferencing. Further suggested avenues for customer engagement include workshops, webinars, educational videos, newsletters, and how-to guides. The report indicates that “it should be noted that customer and stakeholder engagement is not and should not be viewed as an alternative to formal institutions or processes but compliments them.” *Id.*, p. 41. The report discusses ways that jurisdictions outside of Michigan approach customer engagement, including Iowa, Pennsylvania, Florida, Maryland, Nevada, and Ohio. These states have varied approaches and offer much opportunity for study and evaluation for use in Michigan. *Id.*, pp. 42-44.

#### Discussion of the Commission Staff’s Recommendations

The Commission finds that the CE&P workgroup has thoroughly addressed its assigned brief and offers the Commission’s thanks and appreciation for the workgroup’s impressive, thought provoking, and substantive report, which is clearly the result of many hours of dedicated research and discussion. Last month, the Commission announced several changes to its organizational structure to, among other things, better reflect the industries it oversees and set the Commission on a course to effectively navigate transitions in the energy and telecommunications industries. One of those changes included the creation

of a data access, privacy, and IT section within the Commission’s Customer Assistance Division. While there will be more to come as this newly created section is organized, its creation reinforces the increasing importance of data access and privacy reflected in the Staff’s insights and recommendations throughout the CE&P report.

#### 1. Data Access and Privacy Recommendations

The report indicates that the CE&P workgroup took into account the Commission’s order in Case No. U-17102 when it considered its data access and privacy recommendations to the Commission. That order states:

An acceptable data privacy policy should limit collection, use, or disclosure of any customer information to accomplishing primary utility purposes only. Primary utility purposes should encompass not only traditional utility service but should also include all other regulated programs including energy efficiency, demand management, renewable energy, and low-income programs. Should a utility wish to collect, use, or disclose customer information for a secondary (i.e., non-utility) purpose, the utility must obtain informed consent from the customer in advance.

*Id.*, p. 21 (citing the October 17, 2013 order in Case No. U-17102, p. 3). After its extensive research, study, and discussion, the details of which are set forth in the report, the CE&P workgroup believes “Michigan’s current policies should be updated to meet the needs of the evolving consumer and energy landscape.” *Id.*, pp. 21-22. The report further asserts that “the existing policy of limiting data access to primary purposes and regulated programs has led to a significant expansion in utility program offerings, the limited accessibility of this data to non-utility service providers has hindered the development and effectiveness of third-party energy services in Michigan.” *Id.*, p. 22.

Consistent with the CE&P workgroup’s findings, the Staff recommends in Section 4.1 of the report **“that the Commission issue updated guidance as outlined in points 1-10 listed [below] (referenced as “framework” throughout the Staff report) regarding customer privacy and data access,**

referencing the “Customer Data Privacy (Exhibit A)” used in U-17102 as a template for this framework.” *Id.*, p. 23 (emphasis in original).

1. Adoption of the foundation principles outlined in the Fair Information Practice Principles (FIPPs) from the Department of Homeland Security.
  - a. Transparency
  - b. Individual Participation
  - c. Purpose Specification
  - d. Data Minimization
  - e. Use Limitation
  - f. Data Quality and Integrity
  - g. Security
  - h. Accountability and Auditing
2. Require greater transparency of the personal information the utility collects, maintains, purchases, and shares with its contractors and agents and its associated primary purpose through annual disclosure to customers and regulators.
3. Evaluate the existing definition of “primary purpose” to assess if there is proper protection of customer personal information and assess if there is an equal playing field in the competitive energy services market.
4. Adopt a definition of un-shareable personal information, to ensure that highly sensitive information is available only from the customer at their discretion rather than available from the utility.
5. Adopt data aggregation standards that serve the purposes of market research, local government benchmarking, building benchmarking, academic research, and regulatory policy analysis and development.
6. Adopt a definition and standard for sharing of anonymized customer data for academic research purposes.
7. Explore a data sharing dispute resolution process that will mitigate the need for complaint cases before the Commission.
8. Approve deferred accounting treatment for utilities to better understand the costs associated with the proposed expansion of data sharing and the impact on utility operations.
9. Recommend nationally recognized standards and protocols that provide customers and their chosen third parties with easy, secure, and portable access to energy usage information to further empower them in monitoring and managing their energy usage.

10. Consider enabling home area network technology for low-income and vulnerable populations, improving the ease of access to AMI meter and billing information and the subsequent benefits without the need for at home internet connectivity.

[The] Staff believes this updated guidance will align the practices of Michigan IOUs with national best practices and help foster and accelerate Michigan’s clean energy transition, including the achievement of State carbon reduction goals.

*Id.*, pp. 22-23.

The Commission acknowledges and appreciates the above principles and recommendations set forth in the report and is weighing its future actions in these areas to determine the manner, efficacy, and practicality of their implementation in the future. Of particular interest to the Commission is the support of nationally recognized protocols for accessing and sharing energy usage data and allowing for deferred accounting treatment so that utilities may better understand the costs associated with proposed expansion of data sharing and its impact on a utility’s operations.

In Section 4.1.1 of the report, the “**Staff recommends the adoption of the FIPPs foundation principles outlined by the Department of Homeland Security including transparency, individual participation, purpose specification, data minimization, use limitation, data quality and integrity, security, and accountability and auditing.**” *Id.*, p. 26 (emphasis in original). The FIPPs foundation principles are listed below.

- **Collection Limitation Principle**
  - o There should be limits to the collection of personal data and any such data should be obtained by lawful and fair means and, where appropriate, with the knowledge or consent of the data subject.
- **Data Quality Principle**
  - o Personal data should be relevant to the purposes for which they are to be used, and, to the extent necessary for those purposes, should be accurate, complete, and kept up to date.
- **Purpose Specification Principle**
  - o The purposes for which personal data are collected should be specified not later than at the time of data collection and the subsequent use limited to the fulfilment of those purposes or such others as are not incompatible with those purposes and as are specified on each occasion of change of purpose.
- **Use Limitation Principle**



- o Personal data should not be disclosed, made available or otherwise used for purposes other than those specified in accordance except:
  - with the consent of the data subject
  - by the authority of law
- **Security Safeguards Principle**
  - o Personal data should be protected by reasonable security safeguards against such risks as loss or unauthorized access, destruction, use, modification, or disclosure of data.
- **Openness Principle**
  - o There should be a general policy of openness about developments, practices, and policies with respect to personal data. Means should be readily available of establishing the existence and nature of personal data, and the main purposes of their use, as well as the identity and usual residence of the data controller.
- **Individual Participation Principle**
  - o Individuals should have the right:
    - to obtain from a data controller, or otherwise, confirmation of whether the data controller has data relating to them;
    - to have communicated to them, data relating to them;
      - within a reasonable time
      - at a charge, if any, that is not excessive
      - in a reasonable manner
      - in a form that is readily intelligible to them
    - to be given reasons if a request made under the above points are denied, and to be able to challenge such denial;
    - to challenge data relating to them and, if the challenge is successful to have the data erased, rectified, completed or amended.
- **Accountability Principle**
  - o A data controller should be accountable for complying with measures which give effect to the principles stated above.

*Id.*, pp. 24-26 (emphasis in original). *See*,

<https://www.oecd.org/sti/ieconomy/oecdguidelinesontheprivacyandtransborderflowsofpersonaldata.htm#part2> (accessed June 10, 2022).

The Commission acknowledges that FIPPS is a well-accepted, broadly implemented approach to data privacy and finds that the FIPPS privacy guidelines should be practiced by utilities under the Commission's jurisdiction.

In Section 4.1.2, the CE&P report states that the Commission has not yet established a formal requirement for public reporting of privacy policies and practices. The Staff recommends the following:

**The Commission should direct utilities to file a disclosure with the Commission outlining the personal data collected and stored by the IOUs and the primary purpose associated with the data field (i.e., account set-up, payment, etc.). This disclosure should also outline personal information shared with contractors, agents, and unregulated affiliates (without customer consent) in order to perform primary purposes on behalf of the utility and any customer safeguards (non-disclosure agreement, confidentiality agreements, etc.) associated with this sharing. Transparency regarding the amount of personal information collected, who it has been shared with, and the terms and conditions of that sharing is necessary in assessing the reasonableness of a utility’s internal data sharing policies and the existent safeguards in place to protect this information. Based on the quality and content of these disclosures, the Commission can determine the need to pursue formal information gathering regarding personal information collection and sharing in the form of a show cause Order.**

*Id.*, p. 27 (emphasis in original).

The Commission observes that, as a greater level and diversity of customer data is stored and shared by and with various entities such as utilities, retailers, banks, and others, sophisticated instances of data base hacking, data theft, and fraudulent data use are increasing, as well. Accordingly, the ability to learn with whom data has been shared and for what purposes has become critical to data security.

Accordingly, the Commission adopts this recommendation, with the initial disclosure reports (consistent with the above recommendation) from each utility under the Commission’s jurisdiction due no later than 5 p.m. (Eastern time (ET)) on June 1, 2023, and annually thereafter, no later than the June 1 of each successive calendar year. The disclosure reports are to be filed in the Case No. U-20959 docket.

Regarding a primary purpose definition in relation to energy services, the Staff recommends in Section 4.2 that:

**the Commission further explore the implications of provision (4) in the current primary purpose definition stated above, with A) an emphasis on the importance of the protection of customer personal information, B) consideration of the boundaries applicable to utility contractors and agents regarding how customer data is protected after they receive it from utilities, and C) the recognition of the enhanced role of market competition with customer energy services beyond utility offered programs. All three of these issues warrant further exploration and discussion regarding the “catch-all” nature of provision (4) in the current primary purpose definition.**

*Id.*, p. 29 (emphasis in original).

The Commission acknowledges the importance of the examination of the current primary purpose definition and, potentially, the need for further refinement of that definition, but reserves action on the matter pending further exploration and discussion of this issue.

For personal data sharing with agents, contractors, and third parties, the Staff recommends in Section 4.2.1 of the report that the Commission adopt **“a definition of un-shareable personal information, to ensure that highly sensitive information is available only from the customer at their discretion rather than available from the utility.”** *Id.*, p. 30 (emphasis in original).

The Commission adopts the definition of “Personal Data – Un-sharable” that is set forth in the March 25 report, Appendix D, p. 60, Customer Data Privacy, Item K:

“Personal Data – Un-shareable” means personal information collected or known by the Company that cannot be shared with utility contractors, agents or third parties. Such information includes birth date, social security number, biometrics, bank and credit card account numbers, driver's license number, credit reporting information, bankruptcy or probate information, health information, security questions, ground position satellite (GPS) location, electronic device identifier, or network or internet protocol address.

The Commission instructs utilities to include this definition when revising tariffs related to customer data privacy.

In Section 4.3 of the report, the Staff makes two recommendations related to data sharing for secondary purposes.

Applicable in general to data sharing for secondary purposes, the Staff recommends:

**the formal adoption of the 15/15 aggregation standard as a minimum standard for aggregated datasets for residential and commercial customers. Staff recommends the formal adoption of the 4/50 aggregation standard as a minimum standard for aggregated datasets for industrial customers.**

*Id.*, p. 31 (emphasis in original).

The Commission adopts this recommendation and provides further guidance in this order as to the process and dates by which electric and natural gas utilities should make energy usage data accessible for purposes other than primary purposes. The Commission also reserves the right to provide additional guidance on this issue in future orders pending additional exploration and discussion on the matter.

Applicable to anonymous data, the Staff recommends:

**that the Commission adopt the following definition of anonymous data: Anonymous data - A data set containing individual sets of information where all identifiable characteristics and information, such as, but not limited to, name, address, account number, or social security number, are removed (or scrubbed) so that one cannot reasonably re-identify an individual customer based on, for example, usage, rate class, or location.**

*Id.* (emphasis in original).

The Commission adopts the definition of anonymous data as set forth in the March 25 report, Appendix D, p. 59, Customer Data Privacy, Item C:

“Anonymous Data” refers to a data set containing individual sets of information where identifiable characteristics and information, such as, but not limited to, name, address, account number, or social security number, are removed (or scrubbed) so that one cannot reasonably reidentify an individual customer based on, for example, usage, rate class or location.

Related to aggregated data availability for local government benchmarking, the Staff recommends in Section 4.3.1 **“the adoption of aggregation standards 15/15 for residential and commercial customers, and 4/50 data aggregation standards for industrial customers, for local government benchmarking.”** *Id.*, p. 32 (emphasis in original).

The Commission adopts this recommendation and provides further guidance in this order as to the process and dates by which electric and natural gas utilities should make energy usage data accessible for local governments engaging in energy benchmarking research and program implementation. The Commission reserves the right to provide additional guidance on this issue in future orders pending additional exploration and discussion on the matter.

For aggregated data availability for building owners and multi-unit dwellings, the Staff recommends in Section 4.3.2 that:

**whole building data [that] is interoperable with Energy Star Portfolio Manager as it is the current national standard for building level energy tracking and assessment. Building owners whose tenants do not meet the aggregation thresholds should also be able to request information in the Energy Star Portfolio Manager compatible format after obtaining consent from all tenants.**

*Id.*, p. 33 (emphasis in original).

The Commission finds that data obtained in this manner could provide valuable information for whole building benchmarking of energy usage without compromising customer data privacy and strongly encourages utilities to work with building owners and other multi-unit dwellings to develop such a system by which this data can be shared in a format compatible with the U.S. Environmental Protection Agency’s Energy Star Portfolio Manager platform. However, a standardized process should be developed to avoid burdensome costs and procedures for utilities, landlords, and tenants. Building owners should obtain consent from tenants prior to gaining access to such data if the aggregation thresholds for data sharing, as described in this order, are not met.

Relating to aggregated data availability for regulatory policy considerations, the Staff recommends in Section 4.3.3 **“the adoption of aggregation standards 15/15 for residential and commercial customers, and 4/50 data aggregation standards for industrial customers, for regulatory policy analysis and development.”** *Id.*, p. 34 (emphasis in original).

The Commission acknowledges the recommendation to make publicly accessible additional aggregated datasets, like those discussed in the COVID-19 (Case No. U-20757) and Storm Response (Case No. U-21122) dockets, to facilitate improved public policy analysis and program design, and reserves action on this issue pending further exploration and discussion. Furthermore, the Commission looks forward to further guidance and recommendations on the collection and sharing of customer

demographic, affordability, and equity data by the Data Analysis and Regulatory Review Subcommittee of the Energy Affordability and Accessibility Collaborative (EAAC) as requested in Case No. U-18238.

For aggregated data access by academia, the Staff recommends in Section 4.3.4 of the report that:

**[f]or consistency purposes, the aggregation standard used for academia use cases would be 15/15 for residential and commercial, and 4/50 for industrial customers. Staff recommends that the Commission continue to explore additional data standards for residential, commercial, and industrial uses for academic purposes as explored in the May 25, 2021 stakeholder session and referenced with California’s handling of academic use cases.**

*Id.* (emphasis in original) (footnote omitted).

The Commission supports adopting the proposed aggregation standards for academic use cases and will provide further guidance in this order as to the process and dates by which electric and natural gas utilities should make this energy usage data available. The Commission also reserves the right to provide additional guidance on this issue in future orders pending further exploration and study of the matter.

For purposes of data access cost recovery regulatory treatment, the Staff recommends in Section 4.4:

**the approval of deferred accounting treatment to better understand the costs associated with the proposed expansion of data sharing and the impact on utility operations. Staff acknowledges the need for consideration of user fees for aggregated data and recommends that this option should be further explored when data is available to provide a better understanding of the costs associated with the proposed expansion of data sharing.**

*Id.*, p. 35 (emphasis in original).

The Commission adopts this recommendation and supports the approval of deferred accounting treatment for costs associated with implementation of processes and platforms that will allow for third parties to have access to aggregated and anonymized customer energy usage data at the minimum standards adopted in this order. Therefore, the Commission authorizes utilities to record costs associated with instituting the policies and processes necessary to make accessible aggregated and anonymized energy data to third parties, and to defer those costs for recovery after a review for

reasonableness and prudence in a future proceeding. The Commission encourages utilities that utilize deferred accounting treatment to meet with the Staff to review cost-effective options to implement these provisions.

Lastly, the Commission directs electric and natural gas utilities under the Commission's jurisdiction and with greater than 100,000 customers to implement the necessary processes to: (1) support third party access to aggregated and anonymized datasets at the minimum standards adopted in this order, and (2) support third party access to at least 12 months of aggregated and anonymized customer energy usage data within a single rate class and at both the zip code and census tract levels. The Commission further directs those utilities to implement such processes not later than July 1, 2023. Furthermore, by 5:00 p.m. (ET) on July 1, 2023, applicable utilities shall file in this docket documentation detailing how the utility has complied with this directive. Finally, the Commission, at this time, does not see the need to create a separate dispute resolution process to arbitrate conflicts between utilities and customers/third parties related to data access, but reserves the right to address this issue in the future if the current complaint/resolution process is deemed by the Commission as insufficient to address such disputes.

Applicable to customer access and sharing of customer energy usage data, in Section 4.5, the **“Staff recommends the Commission recognize Green Button Connect as the appropriate foundation for easy and secure access to energy usage information in a consumer-friendly and computer-friendly format.”** *Id.*, p. 37 (emphasis in original).

The Commission recognizes Green Button, including Green Button Download My Data and Green Button Connect, as the nationally recognized industry standard for energy data sharing platforms, and therefore, strongly encourages utilities under its jurisdiction to adopt Green Button and seek certification for standards compliance through the Green Button Alliance. The Green Button standard is the highly preferred application for customer data access and sharing because the application supports

interoperability, which is critical “to the development and availability of a robust energy services marketplace for Michigan’s rate payers.” *Id.*, p. 36. Furthermore, the standard ensures data privacy and security, and provides for “an appropriate foundation for easy and secure access to customers’ energy usage information in a consumer-friendly and computer-friendly format.” *Id.*, p. 35. Lastly, while proprietary utility data sharing tools and protocols can be useful, “such solutions can significantly limit customer access to increased offerings of third-party energy services and education that have been built or are being developed from the Green Button Standard.” *Id.*

Pursuant to data access and equity concerns, the Staff recommends in Section 4.6 that **“investor-owned utilities who have fully deployed AMI should pilot HAN and in-home display options for low-income, pre-pay, and senior customers to access customer billing data.”** *Id.*, p. 37 (emphasis in original).

The Commission is cognizant of the benefits that the HAN and in-home display options offer to low-income, pre-pay, and senior customers, as well as those customers in under-served or historically marginalized communities. The Commission encourages utilities to consider offering these benefits through a well-planned and detailed pilot program, utilizing the objective criteria and guidelines approved in Case No. U-20645. In this manner, the costs to provide HAN and in-home displays, as well as the actual benefits to customers, can be assessed and informed decisions made for further expansion of these energy management and energy waste reduction technologies.

## 2. Customer Education and Participation Recommendations

The Staff reports the following key observations gleaned from the CE&P workgroup sessions:

- Customers who lack awareness regarding the reason for a proposed or approved rate increase, who do not understand the process, or who are unable to participate are more likely to be unhappy with the regulatory decision.
- Customer engagement should have a genuine and visible impact on policy and should not simply be an “add-on.” This applies to engagement with both the regulator and



the regulated utilities. Engagement must occur early enough in the process that it can impact the direction and decision of the policy or proposal.

- Honesty regarding the actual involvement of customers and their opportunity to make an impact on decisions is vital for building and preserving trust.
- Customers are more likely to trust an organization with which they are familiar.
- Consumers, not just stakeholders or customer representatives, need to be involved in the engagement.
- Consultation fatigue is real and must be avoided, in part by ensuring that consultation is valuable to those participating.
- Accessibility and visibility are essential to ensuring credibility.
- Customer engagement needs to be embedded in the cultures of the MPSC and the utilities to bring about long-term, customer-centric change.
- The rise of digital communications fuels expectations for more timely engagement and more varied, open, and ongoing relationships between customers, regulators, and providers.

Additionally, three primary principles underpin the recommendations provided below:

1. Building and maintaining trust with communities, stakeholders, and customers.
2. Ensuring transparency.
3. Increasing Commission and MPSC visibility and accessibility.

*Id.*, pp. 44-45.

In Section 6.1 of the report, “[t]he Staff recommends that the Commission develop processes for improved customer engagement in the regulatory space and develop engagement opportunities that allow customers to have a voice in the decision-making process, with particular attention given to communities that have been historically underrepresented in Commission proceedings.”

*Id.*, p. 45 (emphasis in original). Also, “[t]he Staff recommends that the Commission explore opportunities to encourage the utilities to engage with customers on issues including their long-term investment plans, rate case requests, and pilot programs through customer surveys, public meetings, and other available means.” *Id.* (emphasis in original).

The Commission notes that the State of Michigan and interested groups and organizations within the state have engaged in a number of activities with the intention of giving customers a voice. For example, the Utility Consumer Participation Board (UCPB), created by Act 304 of 1982 (MCL 460.6I),

is a five-member board whose purpose is to provide “grants to qualified applicants that represent the interests of Michigan's residential energy (gas, electric, and other fuel) utility customers at residential energy proceedings before the [Commission]. Funding is generated through annual assessments of certain regulated utility companies.” See, <https://www.michigan.gov/lara/about/ucpb> (accessed May 27, 2022). The Michigan Department of Licensing and Regulatory affairs has published the 2022 UCPB meeting schedule and grant application for UCPB funds on its website at the internet address referenced above. The Commission also notes that the Michigan Department of Attorney General intervenes as a consumer advocate in many contested proceedings before the Commission, taking an active role in the presentation of expert testimony and evidence, as well as argument through its briefs.

Additionally, the Commission has scheduled a series of energy assistance fairs and listening sessions at various locations in the state with Commission Staff, representatives from utilities, customer advocacy groups, and helping organizations present to provide customers with opportunities to learn about and obtain funds to assist with their energy costs. These customer-friendly events (children welcome, snacks provided) also provide customers the opportunity to speak out on important consumer issues such as energy affordability, regulatory matters, and other topics.

Furthermore, the Commission has also made efforts to engage customers in formal proceedings of the Commission, including the hosting of both an official Commission meeting and the convening of a public hearing for Case No. U-20836 in Detroit on July 27, 2022, and August 22, 2022, respectively.

Another instance of opportunity for customer engagement is through the Integrated Resource Plan (IRP) filing requirements<sup>4</sup> that encourage utilities to seek customer comments. Information on these proceedings is available on the Commission’s website at

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<sup>4</sup> See, Act 341 of 2016, MCL 460.6t.

<https://www.michigan.gov/mpsc/commission/workgroups/2016-energy-legislation/integrated-resource-plan-filing-requirements-schedule> (accessed July 11, 2022).

The Staff also included this recommendation in Section 6.1:

**To assist the public’s understanding of utility proposals and applications, as well as their potential customer impacts, and to aid individuals interested in providing public comment, Staff recommends that the Commission develop case-specific webpages containing easy to understand summaries of the proposals and issues in utility cases of interest. These webpages could also provide an easily accessible link for customers wishing to submit public comment to support ease of access and participation.**

*Id.*, p. 46 (emphasis in original).

The Commission finds that such webpages could provide valuable information to customers and encourages the Staff to further explore the possibility of developing webpages as described above.

The Staff makes other recommendations in Sections 6.2, 6.3, and 6.4 of the report:

**that the Commission develop and publicize a utility program portal available through the [Commission] website that provides easy access to information regarding available utility programs and offerings.**

*Id.*, p. 46 (emphasis in original).

The Commission directs the Staff to further explore the potential development of a utility program portal.

The Staff further recommends in Section 6.2:

**that the Commission’s communication and outreach staff hold annual convenings of utility outreach and communication staff to examine and review utility customer outreach and education efforts, identify respective barriers to program adoption, and discuss lessons learned and opportunities for improvement and coordination.**

*Id.*, p. 46 (emphasis in original).

The Commission directs the Staff to hold the proposed convening in 2023 and encourages additional convenings in subsequent years.

The Staff recommends in Section 6.3:

**that the Commission develop an overarching, customer facing education program designed to help customers understand the regulatory process, the role and function of the Commission, and the energy issues that impact them. This program should utilize a multi-resources approach and incorporate digital, print, and multi-media options [; and]**

**that the Commission develop an education program designed to educate customer advocates, community organizations, and stakeholders on issues of interest to their constituencies, and should develop materials that these organizations can utilize in their outreach and education efforts [; and]**

**that the Commission develop materials to assist customers in understanding the public comment process and how to make comments in Commission cases. Materials should also be developed to help customers understand cases of significant interest and provide the information necessary to aid in the development of their comment filings to case dockets.**

*Id.*, p. 47 (emphasis in original).

The Staff recommends in Section 6.4:

**that the Commission build capacity to allow for expanded customer outreach, education, and engagement. Assuming sufficient appropriations and budget approvals, this could take the form of a dedicated Community Outreach and Engagement team. The Commission should undertake intentional expanded engagement with historically marginalized communities on issues impacting them including issues of energy accessibility and affordability, energy waste reduction, and utility program offerings and access [; and]**

**that the Commission expand its social media presence and explore opportunities for expanded digital engagement to engage with customers more effectively [; and]**

**that the Commission build intentional and consistent relationships with local stakeholders and seek opportunities to partner with them on education and outreach efforts.**

*Id.*, pp. 47-48 (emphasis in original).

The Commission supports the continued expansion of its social media presence and directs the Staff to pursue this goal. The Commission also supports expanded community outreach, education, engagement, and building intentional relationships with stakeholders and encourages creative thinking in

the development of these matters. However, the Commission is cognizant that significant customer outreach efforts will necessarily be limited if supportive funding is not available.

Additionally, the Staff recommends in Section 6.5 that:

**the Commission develop and issue a survey to community organizations and customer advocates seeking further input regarding community education and engagement activities.**

*Id.*, p. 48 (emphasis in original).

The Commission directs the Staff to develop and issue a survey not later than December 30, 2022, for the purpose of gaining additional information from customers related to customer outreach.

The Staff also recommends in Section 6.5:

**that the Commission identify opportunities to engage the public through public outreach events, townhalls, or other means to better understand the education and participatory needs and interests of utility customers [; and]**

**that the Commission initiate discussions with the Utility Consumer Participation Board to examine opportunities for expanding awareness of intervenor funding opportunities.**

*Id.* (emphasis in original).

The Commission directs the Staff to explore opportunities to hold additional energy assistance fairs and listening sessions as described above in this order. Again, the Commission encourages creativity and flexibility when planning public outreach events but is cognizant that ongoing events may be necessarily limited if supportive funding is not available. The Commission notes that information links to UCPB meetings and application procedures are available via a link on the Commission's website.

THEREFORE, IT IS ORDERED that:

A. Utilities under the Commission's jurisdiction shall adopt the Fair Information Practice Principles as set forth in this order applicable to customer data storage and data sharing.

B. Utilities under the Commission’s jurisdiction shall file a customer data storage and data sharing report, consistent with the description set forth in this order above. Initial disclosure reports from each utility are due no later than 5:00 p.m. (Eastern time) on June 1, 2023, and annually thereafter, no later than the June 1 of each successive calendar year. The reports shall be filed in the Case No. U-20959 docket.

C. The Commission adopts the definition of “Personal Data – Un-sharable” that is set forth in the March 25, 2022 MI Power Grid Status Report, Appendix D, p. 60, Customer Data Privacy, Item K. Utilities shall include this definition when revising tariffs related to customer data privacy.

D. The Commission adopts the definition of anonymous data as set forth in the March 25, 2022 MI Power Grid Status Report, Appendix D, p. 59, Customer Data Privacy, Item C.

E. Not later than July 1, 2023, utilities under the Commission’s jurisdiction with greater than 100,000 customers shall implement processes to enable third party access to aggregated and anonymized data at the minimum standards adopted in this order and shall file in this docket not later than 5:00 p.m. (Eastern time) on July 1, 2023, documentation detailing the process by which aggregated and anonymized data has been made available to third parties. The reports shall be filed in the Case No. U-20959 docket.

F. The Commission Staff shall explore the development of a utility program portal available through the Commission’s website that provides easy access to information regarding available utility programs and offerings.

G. The Commission Staff shall hold a convening with utility outreach and communications staff in 2023, as described in this order.

H. The Commission Staff shall continue to pursue a greater social media presence for the Commission.

I. The Commission Staff shall develop and issue a survey to community organizations and customer advocates not later than December 30, 2022, for the purpose of gaining additional information from customers related to customer outreach.

J. The Commission Staff shall explore opportunities to hold additional energy assistance fairs and listening sessions and other customer outreach events, as described in this order.

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](mailto:mpscedockets@michigan.gov) and to the Michigan Department of Attorney General - Public Service Division at [pungpl@michigan.gov](mailto:pungpl@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

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Daniel C. Scripps, Chair

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Tremaine L. Phillips, Commissioner

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Katherine L. Peretick, Commissioner

By its action of September 8, 2022.

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Lisa Felice, Executive Secretary



# PROOF OF SERVICE

STATE OF MICHIGAN )

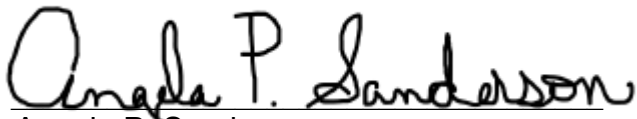
Case No. U-20959

County of Ingham )

Brianna Brown being duly sworn, deposes and says that on September 8, 2022 A.D. she electronically notified the attached list of this **Commission Order via e-mail transmission**, to the persons as shown on the attached service list (Listserv Distribution List).

  
Brianna Brown

Subscribed and sworn to before me  
this 8<sup>th</sup> day of September 2022.



Angela P. Sanderson  
Notary Public, Shiawassee County, Michigan  
As acting in Eaton County  
My Commission Expires: May 21, 2024

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