

**STATE OF MICHIGAN
MICHIGAN PUBLIC SERVICE COMMISSION**

In the matter, on the Commission’s own)
motion, to implement the provisions of) Case No. U-18461
Section 6t of 2016 PA 341.)
)

In the matter, on the Commission’s own)
motion, to commence a collaborative to) Case No. U-21219
consider issues related to integrated resource
and distribution plans.)

**COMMENTS OF
THE CITY OF GRAND RAPIDS**

The City of Grand Rapids (“City”) appreciates the Michigan Public Service Commission’s (Commission) invitation in its June 30, 2022 and July 7, 2022, Orders in the above-captioned dockets, for interested people to submit written comments or concerns regarding its Integrated Resource Plan (IRP) planning and filing guidelines (Guidelines).

Three of the City’s six values are sustainability, equity and collaboration. The City works to make all planning, process, policy and funding decisions through the lens of these values and encourages the Commission to lead with these values throughout its Guidelines. In the face of the climate crisis and the significant impacts it is having, and will continue to have, on our communities, economy, public health and ecosystems, it is paramount that governmental agencies, businesses, institutions, organizations and communities work together to implement changes that will reduce financial barriers for our residents and businesses while improving the health and long-term sustainability of our communities and economy. Finally, this work must acknowledge the significant racial disparities that were created and continue to exist today due to institutional and structural racism.

The City recognizes the significant contribution that the supply and consumption of energy, especially electricity, have on greenhouse gas emissions generation and climate resiliency. One of the City's objectives in its Strategic Plan is to reduce carbon emissions and increase climate resiliency. The City has also identified climate change as one of eleven focus areas for our current fiscal year. The City has focused its work in the following areas:

- Create reasonable goals and integrate those goals across all operations and plans, including the Community Master Plan
- Reduce the carbon footprint of municipal operations
- Assess the feasibility and cost of offsetting 100% of municipal electricity consumption with renewable energy
- Create and support programs and policies to reduce carbon emissions from the building and transportation sectors throughout the community
- Create a Climate Action and Adaptation Plan in partnership with the community
- Work with community partners and businesses to achieve a 40% tree canopy

The City has accomplished the following in recent history with respect to energy supply and consumption:

- Reduced municipal greenhouse gas emissions by 30% from 2008 in comparison to 2020
- Established a best-in-class goal to achieve 85% GHG emissions reductions by 2030 and carbon neutrality by 2040 for all municipal operations
- Constructed and started the operation of a nearly 1 megawatt behind-the-meter ground-mounted solar array at our Lake Michigan Filtration Plant that will generate 10% of the plant's electricity consumption (1.5 million kWh/year) and \$1.55 million in net savings over 24 years
- Achieved approximately 41% renewable energy and continue to work on strategies to achieve our 100% renewable energy goals
- Helped launch the Community Collaboration on Climate Change (C4), which has identified energy burden as one of its priorities
- Launched the Equitable, Healthy and Zero Carbon Buildings Policies Initiative

As the Commission finalizes its Guidelines, the City respectfully requests that the Commission incorporate the following:

- Require utilities to prioritize, in terms of all types of resources (staff time, funding, marketing, etc.), energy waste reduction (EWR). The greater we can all reduce our electricity consumption, the better for all. In addition, require that utilities focus at least 40% (based on Justice40) of all EWR resources in vulnerable/EJ communities. Require

that utilities track, analyze and publicly report their experiences with EWR programs, including resources committed, projects completed for income-qualified residents, location of all EWR investments/projects overlaid with census demographics information; results of EWR investments; and breakdown of EWR program investments into businesses and residents. Require that these inputs be included in EWR modeling.

- Require utilities to provide the following data in modeling and plans:
 - What targets/goals would be achieved based on modeling and how it compares to utility's, State of MI and U.S. GHG emissions reductions goals;
 - the GHG emissions factors used to calculate current and future estimated emissions for both owned and purchased electricity;
 - The total average MWh/year reduction expected from EWR, demand response, battery storage, and distributed generation and the total percent supply reduction;
 - The total average MWh/year increase expected from the electrification of the transportation sector, the electrification of buildings and the growth in the economy, especially electricity-intensive industries such as cannabis and in-door grow operations;
 - Estimated EWR achieved due to the recently approved building codes that are estimated to reduce energy consumption by approximately 30% for newly constructed buildings as well as those going through major renovation; and
 - Reduction in estimated electricity needed for the transportation sector with increased investment in public transit and non-motorized forms of transportation
- Require utilities to conduct research and development on future issues that will significantly impact the energy sector, including the use of hydrogen fuel cells, fuel switching and building electrification and incorporate this into modeling.
- Require utilities to factor in reliability and supply reduction due to distributed generation, EWR, battery storage, microgrids, tree canopy maintenance. While power outages are not something specifically addressed in IRP filings, utilities should be required to model how increasing reliability of the grid via these various opportunities will impact supply and consumption. In addition, upgrades to electrical distribution and transmissions systems will also impact the amount of electricity supply needed.
- Require utilities, in addition to EGLE, to conduct their own environmental justice analysis of all programs, including energy generation, community engagement, EWR, pilot programs, etc. In addition, require that utilities, measure and include energy burden by geographic area, account type (single family residential, multi-family residential) and income qualification in modeling and planning.
- Ensure that utilities are required to include their owned generation as well as generation purchased from MISO in all analysis, data reporting and modeling.
- How the Federal government's investment in the infrastructure bill and Inflation Reduction Act will impact energy supply and consumption.

- Give EGLE’s EJ opinion more weight than merely advisory.
- Require that utilities consider how to broaden engagement beyond 12 months prior to filing their IRP as most utilities have their plans fully created by this time and therefore engagement received at this point is likely to have little impact on the final IRP, especially the modeling. Require that utilities provide accessible engagement opportunities that are focused on traditionally vulnerable populations / EJ communities – including payment for participation for residents and community-based organizations, transportation, childcare, and food; provide information in non-English languages and for visually and audio impaired residents. Require that utilities work most closely with municipalities when doing IRPs as municipalities understand key factors that will impact energy consumption. Require that utilities conduct at least one, and preferably more, engagement events focused specifically on environmental justice issues.
- Require utilities to take into consideration climate science to ensure supply and consumption is forecasted based on future climate projections.
- Require that utilities research, plan for and implement end of life processes that are sustainable for all energy generation types.
- Require utilities to collaborate to understand what is happening across the entire State of Michigan and the upper-Midwest region to plan appropriately for energy supply and consumption.

The City appreciates the opportunity to submit written comments on these matters and looks forward to continuing the collaborate with partners on this important work.

Respectfully Submitted,



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