

STATE OF MICHIGAN  
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter, on the Commission's own motion,	)	
to establish a workgroup to investigate appropriate	)	
financial incentives and penalties to address outages	)	Case No. U-21400
and distribution performance moving forward.	)	
_____	)	

At the April 24, 2023 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

In the summer of 1999, two severe storms struck Detroit Edison Company's<sup>1</sup> (Detroit Edison's) service territory, triggering a significant number of outages. In response, the Commission opened a proceeding on January 3, 2000, in Case No. U-12270 and directed the Commission Staff (Staff), in consultation with electric utilities operating in Michigan, customer groups, and other stakeholders, to examine methods to improve the reliability of the electric distribution system in Michigan and to determine, among other things, whether the use of reliability performance targets would secure good electric service and ensure public safety. After

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<sup>1</sup> Effective January 1, 2013, Detroit Edison Company formally became known as DTE Electric Company (DTE Electric).

consultation with utilities and stakeholder groups, on May 1, 2000, the Staff filed the Proposed Michigan Electric Distribution System Performance Standards in Case No. U-12270 recommending, among other things, that the Commission require utilities to adopt the following performance standards (in relevant part): the System Average Interruption Frequency Index (SAIFI), the System Average Interruption Duration Index (SAIDI), and the Repetitive Interruption Pocket Factor.

Subsequently, on June 5, 2000, Public Act 141 of 2000 (Act 141) became effective and Section 10p(5) of Act 141 directed the Commission to “adopt generally applicable service quality and reliability standards for the transmission and distribution systems of electric utilities and other entities subject to its jurisdiction, including, but not limited to, standards for service outages, distribution facility upgrades, repairs and maintenance, telephone service, billing service, operational reliability, and public and worker safety.” Accordingly, on January 29, 2004, in Case No. U-12270, the Commission approved rules governing service quality and reliability standards for electric distribution systems and transmitted the rules to the Michigan Office of Regulatory Reform<sup>2</sup> for filing with the Secretary of State. Mich Admin Code, R 460.731 and R 460.732 of the Commission’s Service Quality and Reliability Standards for Electric Distribution Systems (Service Quality rules) require electric utilities to file an annual report regarding the utility’s electric service performance and reliability. In addition, in 2004, Mich Admin Code, R 460.741

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<sup>2</sup> The Michigan Office of Regulatory Reform (ORR) was created through Executive Reorganization Order 1995-5, which was codified in MCL 10.151, and was charged with the duty to “review proposed rules, coordinate processing of rules by agencies, work with agencies to streamline the rule-making process, and consider efforts designed to improve public access to the rule-making process.” MCL 24.234(2). Recently, Executive Reorganization Order No. 2019-1, which was codified in MCL 324.99923, created the Michigan Office of Administrative Hearings and Rules (MOAHR) as an agency within the Michigan Department of Licensing and Regulatory Affairs. MOAHR is the successor to ORR.

(Rule 741) stated that “[t]he commission may authorize an electric utility to receive a financial incentive if it exceeds all of the service quality and reliability standards adopted by these rules.”<sup>3</sup>

On October 6, 2008, Public Act 286 of 2008 (Act 286) was signed into law, which amended Act 141. Pursuant to Section 10p(8) of Act 286, the Commission issued a Report on the Status of Power Quality in Michigan on September 1, 2009, in Case No. U-15945 (September 1 Report). See, Case No. U-15945, filing #U-15945-0005. The September 1 Report stated that:

The interest in electric power quality and reliability escalated substantially with the extensive blackout on August 14, 2003, that affected most of [the] Northeastern US and Canada. The Commission issued a 107 page report in November 2003, which concluded that electric reliability had been seriously compromised by the fragmented and ineffective regulation of the electric transmission system and that the simulated (as opposed to real) enforcement of reliability standards was inadequate to protect Michigan or the nation’s citizens.

September 1 Report, p. 5. The September 1 Report also noted that Act 286 required the Commission “to examine what other states have mandated to ensure power quality and customer service satisfaction.” September 1 Report, p. 14. To that end, the Staff reviewed power quality performance measurements and reliability policies in 10 other states: five states were located in the Midwest and the other five were states outside of the Midwest region that appeared to have innovative regulation relating to performance measurements for power reliability. The Staff determined that all 10 states required reporting of SAIDI, SAIFI, and/or the Customer Average Interruption Duration Index (CAIDI). In the September 1 Report, the Commission concluded that:

Consumers Energy [Company (Consumers)] and Detroit Edison at this time should include SAIDI, SAIFI, and CAIDI reporting (with and without major events) on a rolling five year average in a new docket that will be opened by the Commission.

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<sup>3</sup> Through the MOAHR rulemaking process, the Commission updated the Service Quality rules in 2023. MOAHR filed the updated ruleset with the Office of the Great Seal on April 10, 2023, and the updated ruleset was effective that same day. The 2023 version of Mich Admin Code, R 460.741 is substantially similar to the 2004 version with the exception that it now permits an electric utility *or a cooperative* to receive a financial incentive if it exceeds all of the service quality and reliability standards adopted by the rules.

These indices have been proven to show the reliability of electricity in a utility's power system and are useful to the Commission in identifying utility performance trends for each specific utility on a going forward basis.

September 1 Report, p. 19.

In the September 15, 2009 order in Case Nos. U-15901 *et al.* (September 15 order), the Commission opened a docket in Case No. U-16065 for Detroit Edison and a docket in Case No. U-16066 for Consumers and directed the companies to file power quality data derived from primary meter monitors. Additionally, the Commission directed Consumers and Detroit Edison to file annual power quality reports in these dockets that include information related to SAIFI, SAIDI, and CAIDI beginning April 2, 2010, "with and without major events, on a rolling five year average basis, using the industry standard IEEE [Institute of Electrical and Electronics Engineers] method of calculation." September 15 order, p. 3. Furthermore, the Commission stated that, "[b]ased upon these reports, the Commission directs the Staff, no later than September 1, 2013, to report back to the Commission with recommendations regarding the need for additional standards, guidelines, or rules addressing power quality. The Staff's report shall be filed in the dockets in Case Nos. U-16065 and U-16066." September 15 order, p. 3.

On August 30, 2013, in Case Nos. U-16065 and U-16066, the Staff filed its Report on the Status of Power Quality in Michigan and a revised report on September 9, 2013, in the same dockets (September 9 Report). *See*, Case No. U-16065, filing #U-16065-0007, and Case No. U-16066, filing #U-16066-0007. The Staff stated that it:

recommends that the annual filing of power quality and reliability reports to the Michigan Public Service Commission be continued for Consumers and DTE Electric as outlined in the 2009 Power Quality Report. Staff also recommends the Commission consider expanding this reporting requirement to all regulated utilities operating within Michigan. Staff believes the accessibility of such power quality and reliability information that has been supplied by Consumers and DTE Electric is instrumental to regulators as they attempt to understand utility customer experience and the reasonableness of reliability based expenditures in company rate

cases. In addition, it allows customers who have been affected by power quality to access utility data to see how the utility is faring in improving power quality and reliability. Without these reports, Commission staff will lose an important tool in measuring effectiveness of reliability based expenditures, which could have a negative impact on rate payers. Staff believes that the continued annual filing of this information is fundamental to effective electric regulation in the State of Michigan and recommends that it be expanded to all IOUs [investor-owned utilities].

September 9 Report, p. 27. The Commission agreed with the Staff's recommendation, and in the January 23, 2014 order in Case Nos. U-16065 *et al.*, p. 4, directed the IOUs and cooperatives to "add the reliability indices and the power quality information to their annual electric reliability reports" that are required by the Service Quality rules.

On December 21, 2016, Public Act 341 of 2016 (Act 341) was signed into law. Pursuant to Section 6u of Act 341, by April 20, 2018, the Commission was to complete a study addressing performance-based regulation (PBR), under which a utility's authorized rate of return would depend on the utility achieving targeted policy outcomes. On April 20, 2018, the Commission provided the Report on the Study of Performance-Based Regulation to the Governor and the Legislature (April 20 Report).<sup>4</sup> In the April 20 Report, the Commission found that "PBR provides goals and metrics that enable utilities to forecast efficient total expenditures" and that "PBR can also be designed to provide incentives and disincentives that help the utility focus on and improve customer satisfaction, safety, reliability, and environmental performance." April 20 Report, p. 10. The Commission noted that it would continue to evaluate whether the use of various PBR mechanisms could facilitate a more reliable, resilient grid, while increasing value to customers.

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<sup>4</sup> See, [https://www.michigan.gov/mpsc/-/media/Project/Websites/mpsc/regulatory/reports/Legislature-Other/2018\\_MI\\_PBR\\_Report\\_Final.pdf?rev=11e7858284b440098b54a9e3d948e219&hash=6DF59C122187584D45C675F8895B6037](https://www.michigan.gov/mpsc/-/media/Project/Websites/mpsc/regulatory/reports/Legislature-Other/2018_MI_PBR_Report_Final.pdf?rev=11e7858284b440098b54a9e3d948e219&hash=6DF59C122187584D45C675F8895B6037) (accessed April 21, 2023).

In the October 17, 2019 order in Case No. U-20645 (October 17 order), the Commission established the MI Power Grid initiative in partnership with Governor Gretchen Whitmer. MI Power Grid is a multi-year, focused stakeholder initiative established for the purpose of maximizing the benefits of the transition to clean distributed energy resources (DERs) for Michigan businesses and residents. The October 17 order included a focus on Optimizing Grid Investments and Performance, setting forth a financial incentives/disincentives work area: “**Financial incentives/disincentives** will build on studies and actions addressing performance-based ratemaking and statutorily authorized incentive mechanisms to ensure utility investments are optimized for the benefit of customer service, system reliability, and safety.” October 17 order, p. 8 (emphasis in original).

In the May 8, 2020 order in Case No. U-20561, addressing DTE Electric’s 2019 request to increase its rates for the sale of electricity (May 8 order), the Commission stated that:

[t]he exploration of appropriate performance metrics is important to the Commission because it helps inform potential revisions to service quality/technical standards and it assists the Commission in reviewing the actions and investment proposals in utility planning, ratemaking (e.g., incentive compensation and tree trimming), PSCR [power supply cost recovery], etc. The Commission finds that these issues should be specifically explored in the MI Power Grid initiative.

May 8 order, pp. 105-106. The Commission also directed DTE Electric to include in its next distribution investment and maintenance plan (distribution plan) “proposed PBR elements with reasonable metrics tied to utility financial performance, improvement targets, and timelines for achievement.” *Id.*, p. 106. The Commission provided an itemized list of PBR topics for the company’s consideration, including the following:

1. The utility’s financial PBR system should include both incentives and disincentives based on performance; incentive structures should be holistically considered in terms of impacts on potential earnings;

2. The utility should consider the pros and cons of a comprehensive PBR system, which would avoid concurrent regular annual rate cases and separate PBR reconciliations;
3. Performance metrics should include outcome measures (e.g., customer average interruption duration index (CAIDI)) and not be limited to output metrics such as number of poles replaced;
4. Performance metrics should be linked to regional, national, and/or peer utility benchmarks, where possible;
5. Data and calculation methodologies should be well defined, transparent, and open for auditing/verification purposes;
6. Targets should be utility specific; and
7. Potential areas of performance focus are safety, customer service (end-use customers, builders, interconnecting generators, etc.), timeliness and quality, reliability and resiliency, long-term costs, and innovation.

May 8 order, pp. 106-107.

On August 20, 2020, the Commission issued an order in Case No. U-20147 (August 20 order) directing DTE Electric, Consumers, and Indiana Michigan Power Company (I&M) to file by September 30, 2021, their distribution plans consistent with the directives in the August 20 order. The Commission stated that pursuant to the May 8 order, DTE Electric was to include proposed PBR elements in its plan; however, at that point in time, the Commission was not expecting I&M to incorporate a PBR framework or metrics in its plan. The Commission also noted that it was “aware that issues involving distribution system performance and financial incentives and disincentives are contested issues in Consumers’ electric rate case in Case No. U-20697. The requirements listed [in the May 8 order] apply only to DTE Electric; additional requirements for Consumers (if any) will be included in the Commission’s order in Case No. U-20697.” August 20 order, pp. 47-48. On December 17, 2020, the Commission issued its order in Case No. U-20697

(December 17 order), which included the same list of PBR topics as was included in the May 8 order. December 17 order, p. 272.

On April 30, 2021, in Case No. U-20147, Consumers filed its draft Electric Distribution Infrastructure Investment Plan for 2021-2025, and filed a final plan on June 30, 2021. On July 30, 2021, in Case No. U-20147, I&M filed its draft Five Year Distribution Plan for 2021-2025, and filed a final plan on September 30, 2021. On August 2, 2021, in Case No. U-20147, DTE Electric filed its draft 2021 Distribution Grid Plan Report, and filed a final plan on September 30, 2021.

On August 25, 2021, the Commission issued an order in Case Nos. U-21122 *et al.* (August 25 order) requesting comments from interested persons regarding the distribution plans filed by DTE Electric, Consumers, and I&M in Case No. U-20147. In the August 25 order, p. 10, the Commission posed several questions for comment, including “[d]o the financial incentives and penalties identified by the utilities [in their distribution plans] align the respective utility’s financial goals with the goals of this Commission in reducing outages and improving distribution performance?” The Commission received comments from more than 100 stakeholders in response to the August 25 order.

The Commission reviewed DTE Electric’s, I&M’s, and Consumers’ distribution plans and the related comments, and in the September 8, 2022 order in Case No. U-20147 (September 8 order), the Commission found that “current approaches to distribution planning . . . are insufficient to address issues impacting the reliability of utility service to customers—whether current issues or those forecasted for the future.” September 8 order, p. 67. The Commission further noted that “[o]f paramount concern are continuing issues dealing with the safety and reliability of the system, including multiple fatalities within the month of August resulting from contact with downed wires as well as frequent and sustained outages stemming from storm events.” *Id.* In addition, the



Commission determined that the utility distribution grids in Michigan were not well prepared for the growth of electric vehicles (EVs) and other DERs. *Id.*

To improve this situation, the Commission directed the utilities to provide, as part of future distribution plans, forecasted metrics and “projections of these metrics mapped to planned system investments to be able to directly understand the benefits that anticipated investments will bring to customers’ reliability.” *Id.*, p. 69. In addition, the Commission stated that the utilities should “benchmark their reliability performance measures, such as SAIDI, SAIFI, CAIDI and CEMI [customers experiencing multiple interruptions] against peer companies in the industry and identify areas of improvement.” *Id.* (quoting Attorney General’s comments, p. 7). Furthermore, the Commission requested comments from interested persons regarding the appropriate metrics for incorporating DERs and DER integration into future distribution plans.

In addition, in the October 5, 2022 order in Case No. U-21305 (October 5 order), the Commission noted that:

despite investigations spanning over two decades, the average reliability scores for system average interruption frequency index (SAIFI) and system average interruption duration index (SAIDI) scores have not improved [for Michigan utilities]. Michigan’s weighted SAIFI score including major event days (MEDs) increased by approximately 0.1 outages during the period of 2010-2020, actually worsening average system reliability over that period. Michigan’s weighted SAIDI score including MEDs, has remained the same over this same period.

October 5 order, p. 3 (footnote omitted). The Commission remains committed to investigating methods to improve the distribution system reliability and resiliency, worker and customer safety, and cost savings and value for both customers and the utilities.

As part of these efforts, on March 24, 2023, in Case No. U-20629, the Commission issued an order formally adopting revisions to its Service Quality rules. These updated rules require each electric utility to “plan to operate and maintain its distribution system in a manner that will permit

it to provide service to its customers without experiencing an unacceptable level of performance as defined by these rules.” Mich Admin Code, R 460.721. Unacceptable level of performance is defined as “fail[ing] to meet any of the following sustained interruption standards:

(a) Considering data derived through the amalgamation of data from all conditions, an electric utility or cooperative shall restore service within 36 hours to not less than 90% of its customers experiencing sustained interruptions.

(b) Considering data including only catastrophic conditions, an electric utility or cooperative shall restore service within 48 hours to not less than 90% of its customers experiencing sustained interruptions.

(c) Considering data including only gray sky conditions, an electric utility or cooperative shall restore service within 24 hours to not less than 90% of its customers experiencing sustained interruptions.

(d) Considering data including only normal conditions, an electric utility or cooperative shall restore service within 8 hours to not less than 90% of its customers experiencing sustained interruptions.

(e) From the effective date of these rules until December 31, 2029, considering data derived through the amalgamation of data from all conditions, not more than 6% of an electric utility’s or cooperative’s customers may experience 4 or more sustained interruptions in a calendar year.

(f) Beginning January 1, 2030, considering data derived through the amalgamation of data from all conditions, not more than 5% of an electric utility’s or cooperative’s customers may experience 4 or more sustained interruptions in a calendar year.

Mich Admin Code, R 460.722. In addition, the Commission’s Service Quality rules also include updated requirements relating to wire down relief requests, as well as requirements relating to meter reading and new service installations. *See*, Mich Admin Code, R 460.723 and R 460.724(a) and (b).

## Discussion

In the September 8 order, the Commission addressed the question of whether “the financial incentives and penalties identified by the utilities align the respective utility’s financial goals with the goals of this Commission in reducing outages and improving distribution performance.”

September 8 order, p. 3 (quoting August 25 order, p. 10). The Commission found that “what was submitted by the utilities in their distribution plans to be insufficient to address the issue of financial incentives and penalties at this time.” September 8 order, p. 71. Therefore, the Commission stated that it planned to initiate a workgroup to address the issue and that “[a]dditional guidance on the focus of this workgroup will be provided at that time.” *Id.*

In its November 18, 2022 order in Case No. U-20836 (November 18 order), the most recently concluded general rate case proceeding for DTE Electric, the Commission reiterated that it planned to establish a workgroup to consider the appropriate financial incentives and penalties to address outages and distribution performance and to set parameters for a performance-based ratemaking mechanism. November 18 order, pp. 472-473.

Notably, the Commission’s Service Quality rules also include provisions relating to financial incentives. Specifically, Mich Admin Code, R 460.741(1) provides that “[t]he commission may authorize an electric utility or cooperative to receive a financial incentive if it exceeds all of the service quality and reliability standards adopted by these rules.” *See also*, Mich Admin Code, R 460.742(2)(c). The Commission can consider requests for such an incentive mechanism as part of a contested case proceeding, including either rate case proceedings or a single-issue proceeding focused on the incentive mechanism as provided for in the rules. *See*, Mich Admin Code, R 460.741(2).

Building on the significant work done to date on this issue and consistent with the newly updated Service Quality rules, the Commission is opening this docket to establish a Financial Incentives and Disincentives workgroup. While the utilization of PBR, including financial incentives and disincentives, to better align utility financial performance with customer value can involve a broad range of activities, given the ongoing and emerging challenges relating to the utilities' distribution grids, the Commission finds it most appropriate to narrow the initial focus of this workgroup to a "reliability-plus" approach to distribution grid performance. Within this focus on distribution performance, of foremost and most immediate concern are issues involving distribution reliability and safety. As such, an initial focus of the Financial Incentives and Disincentives workgroup shall include developing appropriate metrics relating to reliability including, but not limited to, SAIDI (including and excluding MEDs), SAIFI, CEMI, CAIDI, and resilience, including, but not limited to, downed wire response and the frequency and duration of outages during extreme weather, and shall use the recently updated Service Quality rules as a baseline.

Beyond this primary focus on distribution reliability and safety, the workgroup shall also consider challenges around the readiness of utility distribution grids to effectively accommodate and leverage the increasing and further anticipated growth of distributed generation, EVs, and other DERs. The Commission notes that the feedback received from stakeholders on the questions posed on this issue in the September 8 order is a reasonable starting point in developing metrics relating to these emerging issues around distribution performance.

After developing metrics around distribution performance, the workgroup shall explore rate structures and the methods by which incentives and disincentives may be applied. The Staff shall file a report of the workgroup's investigations and findings by December 31, 2023.

THEREFORE, IT IS ORDERED that the Commission Staff shall convene a Financial Incentives and Disincentives workgroup and file a report of the workgroup's investigations and findings by December 31, 2023.

The Commission reserves jurisdiction and may issue further orders as necessary.

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 April 24, 2023.

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Lisa Felice, Executive Secretary

# PROOF OF SERVICE

STATE OF MICHIGAN )

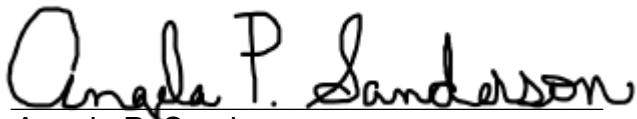
Case No. U-21400

County of Ingham )

Brianna Brown being duly sworn, deposes and says that on April 24, 2023 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 24<sup>th</sup> day of April 2023.



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

## GEMOTION DISTRIBUTION SERVICE LIST

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