



Michigan Public Service Commission
7109 W Saginaw Hwy
Lansing, MI 48917.
Submitted electronically

February 2, 2024

Dear Commissioners,

The Michigan Municipal Association for Utility Issues (MI-MAUI) has joined CUB's detailed comments on the revised staff straw proposal in U-21400. Additionally, several of its member communities wish to submit individual comments on the broad concept, which are enclosed. As you will see, they all express grave concern about the prospect of regulated utilities receiving financial incentives for substandard electric reliability performance.

MI-MAUI members represent communities that have been hit hard by electric outages in recent years, and which themselves are utility operators. Municipal budgets and operations have borne a heavy burden from responding to outages. When a utility does not meet performance standards, the appropriate response is to exact accountability, not charge customers extra to encourage the utility to provide an appropriate level of service.

MI-MAUI members share the Commission's view that it is very important to improve electric reliability and we encourage the Commission to bring both creativity and accountability to the project. Its members firmly believe, however, that this potential approach is not the way to do that.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Bunch", is written over a light gray circular graphic element.

Rick Bunch
Executive Director

Attachments



Sheldon A. Neeley
Mayor

City of Flint

Office of the Mayor

Clyde D. Edwards
City Administrator

February 1, 2024

Michigan Public Service Commission
7109 W. Saginaw Highway
Lansing, MI 48917

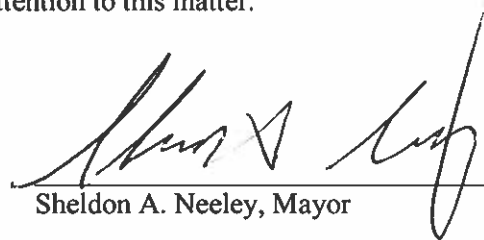
Dear MPSC Members,

I am writing, as the Mayor for the City of Flint, to express my concerns and urge that the Michigan Public Service Commission reconsider providing financial incentives for Consumers Energy unless they meet or exceed the minimum performance standards as set forth in the MPSC's Service Quality and Reliability Rules.

The residents of the City of Flint frequently contact the City to express various frustrations stemming from power outages and delayed restoration. Having previously suffered through the Flint Water Crisis, the City of Flint's residents are keenly aware of the need to raise concerns and issues related to public utilities loudly, repetitively, and at the earliest possible opportunity. Power outages and delayed restorations lead to dangerous indoor temperatures, an inability to work remotely, and the additional burden of food waste that the City's residents can ill afford. Rewarding Consumers Energy for failing to meet the minimum performance standards creates perverse and illogical disincentives that I believe will ultimately harm the City's residents.

Thank you for your attention to this matter.

Respectfully,



Sheldon A. Neeley, Mayor

OFFICE OF THE MAYOR

MAUREEN MILLER BROSNAN
MAYOR



33000 CIVIC CENTER DRIVE
LIVONIA, MICHIGAN 48154-3097
(734) 466-2201
FAX: (734) 421-4870

January 30, 2024

Michigan Public Service Commission
PO Box 30221
Lansing, MI 48909

Re: Case No. U-21400

Dear Commission Members:

The MPSC staff recommendation includes a proposal that would provide financial incentives to DTE even in situations where minimum performance standards are not met.

We strongly disagree with this proposal!

In 2023, the City of Livonia experienced unacceptable frequency and duration of power outages. DTE has acknowledged this and has pledged improvements. We welcome this commitment.

However, rate payers should not be liable for any financial incentives to DTE until after they have exceeded minimum performance standards.

Sincerely,


Maureen Miller Brosnan
Mayor

cc: Director of Finance



City of Kentwood, Michigan

Office of the Mayor

February 1, 2024

Michigan Public Service Commission

RE: Case No. U-21400

Dear Commissioners:

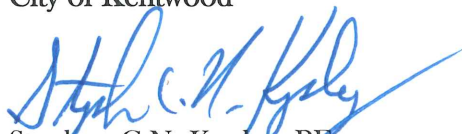
The City of Kentwood has learned that MPSC staff have proposed that utilities should receive financial incentives (bonuses) for improved performance. My concern is awarding performance that is currently, to our knowledge, not in compliance with minimum performance standards, as outlined in the Commission's Service Quality and Reliability Rules (SQRs) in an attempt to incentivize utility staff to provide the required service to meet the standards. Why should a customer pay a monopoly utility company more money to its staff to encourage better performance so that standards can be met.

I trust the attempt is not to incentivize monopoly utility companies to pay staff incentives to perform excellent service for a captive customer base. As with monopolized utility companies, the City of Kentwood is in the same boat. We have a captive customer base. It would be imprudent to add performance-based financial incentives to our staff for them to provide excellent service. Excellent service is the goal and requirement for each employee to work here! Excellent service is what is expected and demanded!

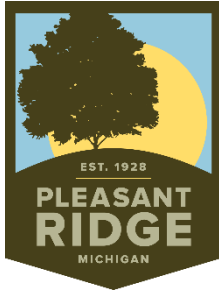
Please count the City of Kentwood disagreeing with any form of financial incentives.

Sincerely,

City of Kentwood


Stephen C.N. Kepley, PE
Mayor

The City of Kentwood is an Equal Opportunity Employer and a Drug-Free Workplace



City of Pleasant Ridge

23925 Woodward Avenue, Pleasant Ridge, Michigan 48069
Phone: 248-541-2901 • Web: www.cityofpleasantridge.org

City Commission
Bret Scott, Mayor
Chris Budnik
Alex Lenko
Ann Perry
Katy Schmier

City Manager
James Breuckman

Rick Bunch
MI-MAUI

February 1, 2024

Re: MPSC Case No. U-21400

On behalf of the City of Pleasant Ridge, I urge the MPSC to reject the concept of offering financial incentives to utilities for improved performance when they are not already in compliance with minimum performance standards as set forth in the Commission's Service Quality and Reliability Rules (SQRs).

Financial incentives exist to encourage excellent, or at least above-average performance. I can see no justification for offering financial incentives for utilities until they at least meet the minimum standards in the SQRs, and demonstrate that they have above average performance compared to other public utilities across the nation.

Once the utilities can demonstrate that they meet the SQRs and are also, at minimum, meeting average national performance standards, the Commission should reconsider the concept of offering performance incentives to utilities.

I could not offer bonuses to poorly performing employees in my organization, so I cannot see how we would offer bonuses to our poorly-performing public utilities.

Best,

James Breuckman
City Manager



Meridian Township
5151 Marsh Road
Okemos, MI 48864

P 517.853.4000
F 517.853.4096

Township Board:

Patricia Herring Jackson
Township Supervisor

Deborah Guthrie
Township Clerk

Phil Deschaine
Township Treasurer

Scott Hendrickson
Township Trustee

Kathy Ann Sundland
Township Trustee

Peter Trezise
Township Trustee

Marna Wilson
Township Trustee

Frank L. Walsh
Township Manager

January 31, 2024

Michigan Public Service Commission
7109 W Saginaw Hwy
Lansing, MI 48917

Dear Michigan Public Service Commission Members:

I am writing to express my concerns and to urge the Michigan Public Service Commission to reconsider the provision of financial incentives for DTE Energy and Consumers Energy unless they meet or exceed minimum performance standards as set forth in the Commission's Service Quality and Reliability Rules (SQRs).

As the Deputy Township Manager of Meridian Township, residents frequently contact my office to express their frustration with the frequent power outages and delayed restoration times.

Thank you for your attention to this matter. I appreciate your dedicated service to the people of Michigan.

Sincerely,

Dan Opsommer
Deputy Township Manager
Director of Public Works & Engineering



January 31, 2024

Michigan Public Service Commission
7109 W. Saginaw Highway
Lansing, MI 48917

Dear Michigan Public Service Commission members,

I am writing to express my concern and to urge the Michigan Public Service Commission to reconsider the provision of financial incentives for DTE Energy and Consumers Energy unless they meet or exceed minimum performance standards as set forth in the Commission's Service Quality and Reliability Rules (SQRs).

As the City Manager of the City of Birmingham, residents frequently contact my office to express their frustration stemming from frequent power outages and delayed restoration. Residents have reported dangerous temperatures in their homes, the inability to work in their homes, and needless food waste due to the frequent power outages. The frequency and duration of these outages are unacceptable for the City of Birmingham's residents and for all Michiganders.

Thank you for your attention to this matter, and I appreciate your dedication to ensuring the provision of reliable utility services for the people of Michigan.

Sincerely,

Jana L. Ecker
City Manager