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May 24, 2024

Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 West Saginaw Highway
Lansing, MI 48917

RE: In the matter of the Application of **DTE ELECTRIC COMPANY** for partial waivers of certain Service Quality and Reliability Standards for Electric Distribution Systems pursuant to R 460.751 and related relief
MPSC Case No. U-21643

Dear Ms. Felice:

Attached for electronic filing in the above referenced matter is DTE Electric Company's Application, Direct Testimony and Exhibits of Witnesses, Denise C. Sampson and Anthony L. Turner. Also Attached is the Proof of Service.

Very truly yours,

John A. Janiszewski

JAJ/erb
Encl.

cc: Service List

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the Application of)
DTE ELECTRIC COMPANY)
for partial waivers of certain Service Quality and)
Reliability Standards for Electric Distribution)
Systems pursuant to R 460.751 and related relief)

Case No. U-21643

APPLICATION

DTE Electric Company (“DTE Electric” or the “Company”) respectfully requests that the Michigan Public Service Commission (“MPSC” or the “Commission”) partially waive the Company’s obligation to comply with certain limited requirements of the Commission’s Service Quality and Reliability Standards for Electric Distribution, 2004 AACCS; 2023 MR 7; Rule 460.701 *et seq.* (“Service Quality Rules”), pursuant to Rule 460.751. Specifically, DTE Electric requests permanent partial waivers of Service Quality Rules 460.744(1)-(2), 460.745(1), and 460.746(1) (the “Rules”), as applied to Advanced Meter Infrastructure (“AMI”) opt-out customers who receive service under the Company’s Non-Transmitting Meter Provision Tariff C5.7. In conjunction with requesting partial waivers of the Rules, the Company requests that the Commission approve its proposed alternative procedures for AMI opt-opt customers to notify the Company of their intent to receive an outage bill credit and the resulting alternative deadline for the Company to issue an outage bill credit. In support of the relief requested in this Application, DTE Electric states as follows:

1. DTE Electric is a corporation organized and existing under and by virtue of the laws of the State of Michigan, with its principal office at One Energy Plaza, Detroit, Michigan

48226. DTE Electric is owned by DTE Electric Holdings, LLC, which is a wholly-owned subsidiary of DTE Energy, providing retail electric service to customers located in Michigan.

2. DTE Electric’s retail electric business is subject to the Commission’s jurisdiction pursuant to Michigan law, including certain provisions of 1939 PA 3, as amended, including 2016 PA 341, MCL 460.1 *et seq.*; 1909 PA 106, as amended, MCL 460.551 *et seq.*; 1909 PA 300, as amended, MCL 462.2 *et seq.*; and 2008 PA 295, as amended, MCL 460.1001 *et seq.* Under these statutory provisions, the Commission has the power and jurisdiction to regulate the Company’s retail electric rates.

3. DTE Electric presently serves its jurisdictional metered retail customers under the rates and charges contained in the Company’s Commission-approved tariffs.

4. On March 24, 2023, the Commission issued an order in Case No. U-20629 adopting updated Service Quality Rules. The updated Service Quality Rules became effective on April 10, 2023.

5. Rule 460.751(1) of the Service Quality Rules permits an electric utility to request a permanent or temporary waiver or exception from the Rules “when specific circumstances beyond the control of the electric utility or cooperative render compliance impossible or when compliance would be unduly burdensome or technologically infeasible.”

6. Pursuant to Rule 460.751 of the Service Quality Rules, and as further explained in the supporting Direct Testimony and Exhibits, the Company is requesting permanent partial waivers of the Rules, because it is technologically infeasible and unduly economically burdensome for the Company to comply with the Rules as applied to AMI opt-out customers who receive service under the Company’s Non-Transmitting Meter Provision Tariff C5.7.

7. DTE Electric understands the Rules to collectively impose a mandatory obligation for an electric utility to automatically identify customers impacted by a qualifying outage and know the details of the corresponding outage duration. The electric utility is then required to investigate, confirm eligibility, and process the outage bill credit, if the customer is approved, within 90 days of restoring service.

8. DTE Electric understands Rule 460.744(1)-(2) to require the Company to automatically identify affected customers and provide an outage bill credit within 90 days of restoring service after a sustained interruption that occurred during gray sky or catastrophic conditions.

9. DTE Electric understands Rule 460.745(1) to require the Company to automatically identify affected customers and provide an outage bill credit within 90 days of restoring service after a sustained interruption that occurred during normal conditions.

10. DTE Electric understands Rule 460.746(1) to require the Company to automatically identify affected customers and provide an outage bill credit within 90 days of restoring service after a sixth sustained interruption in a 12-month period.

11. For reasons explained in detail elsewhere in this Application and supporting Direct Testimony and Exhibits, there is good cause for a permanent partial waiver of the limited requirements in the current Service Quality Rules. The Company's request solely applies to AMI opt-out customers who receive service under the Company's Non-Transmitting Meter Provision Tariff C5.7. As of the date of this filing, the Company serves approximately 13,000 AMI opt-out customers. AMI opt-out customers accept service under Non-Transmitting Meter Provision Tariff C5.7, which confirms they are unable to access all of the benefits of having a transmitting AMI meter. It is beyond the Company's control when a customer refuses an AMI meter and chooses to

accept service under Non-Transmitting Meter Provision Tariff C5.7. Despite the Company's efforts to comply with the Rules, as applied to AMI opt-out customers, both technological and economic barriers prevent such compliance to this subset of uniquely situated customers.

12. The Company's ability to automatically provide a bill credit to AMI opt-out customers is not technologically feasible within the prescribed 90 days because of the lack of requisite outage data generated by non-transmitting meters. Although the Rules do not distinguish AMI and AMI opt-out customers, the AMI-derived meter data required to identify instantaneous outage data and automatically determine bill credit eligibility does not exist for AMI opt-out customers. Thus, the Company's ability to automatically identify customers who are eligible for a duration or frequency bill credit under the Rules is not technologically feasible due to not having the ability to automatically retrieve data.

13. It is unduly economically burdensome for the Company and its customers as a whole to develop and implement an internal automation technology system that would specifically identify AMI opt-out customers as eligible for outage bill credits and provide the outage bill credits within 90 days under the Rules. The source of the current automation technology is AMI data, which is not available for AMI opt-out customers. A viable solution to automatically identify and develop the complex logic needed to establish the outage time and restoration time for all AMI opt-out customers would require an extensive amount of time and effort to develop and result in the Company incurring substantial costs.¹ If the Company incurred costs to comply with the Rules, as applied to AMI opt-out customers, such costs should not be borne by DTE Electric's customers as a whole. AMI opt-out customers accept service under Non-Transmitting Meter Provision Tariff

¹ For reference, the time and cost associated with the current automation application for AMI customers implemented in July 2023 concluded as an 18-month effort of development and implementation, and resulted in an investment of approximately \$1.2 million.

C5.7 knowing that they will be unable to access all of the benefits of having a transmitting AMI meter. Under cost of service principles, DTE Electric's customers as a whole should not have to pay for the substantial costs required to develop and implement an automation application caused exclusively by AMI opt-out customers. Thus, it would be unduly economically burdensome for the Company to incur substantial costs for the exclusive benefit of AMI opt-out customers who have made a decision to forgo having access to the benefits of AMI meters.

14. In the absence of the requisite outage data generated by non-transmitting meters, and in conjunction with DTE Electric's request for permanent partial waivers of the Rules, the Company seeks approval of an alternative means for initiating and processing outage bill credits for AMI opt-out customers. The proposed alternative option for AMI opt-out customers to receive an outage bill credit that they are eligible for is to contact the Company's customer service department via phone to request a reliability credit review which requires the Company to perform a manual investigation to determine the outage duration. Under the Company's proposed alternative option for AMI opt-out customers, the response time to investigate, confirm eligibility, and process the bill credit, if the customer is approved, is 90 days *after* the customer's initial request.

15. In effect, the Company is simply requesting that (i) AMI opt-out customers directly contact the customer service department to initiate a reliability credit review due to the lack of requisite outage data generated by non-transmitting meters; and (ii) the 90 day deadline for providing an outage bill credit, when applicable, begin tolling on the date of the AMI opt-out customer's initial request to the customer service department. Notably, the Company's responsive deadline of 90 days applied to AMI opt-out customers mirrors the duration for AMI customers. For both AMI customers and AMI opt-out customers, the 90-day responsive deadline for providing

an outage bill credit begins when the Company is notified either through automated AMI data or when an AMI opt-out customer contacts the customer service department.

16. In addition to revising Non-Transmitting Meter Provision Tariff C5.7 to reflect the Commission's approvals in this matter, DTE Electric will use multiple channels of communication to ensure AMI opt-out customers are aware of the process change and expectations for requesting a bill credit review. For existing AMI opt-out customers, a bill insert will be sent via mail and a message on demand will be sent via email and/or text regarding the process change and expectations. New AMI opt-out customers will receive a letter advising of their opt-out request, including expectations for requesting a bill credit review. The external DTE Energy website that includes detailed information regarding Electric Reliability Credits also will be updated to set forth the process for AMI opt-out customers for continued awareness.

17. In sum, DTE Electric is seeking permanent partial waivers of the Rules, as applied to current and future AMI opt-out customers, because it is technologically infeasible to automatically provide a bill credit to AMI opt-out customers within the prescribed 90 days and unduly economically burdensome for the Company to develop and implement an internal automation technology system that would specifically identify AMI opt-out customers as eligible for outage bill credits and provide the outage bill credits within 90 days.

WHEREFORE, based on the foregoing, DTE Electric Company respectfully requests that the Michigan Public Service Commission set an early hearing date and enter an order:

- A. Granting DTE Electric's request for permanent partial waivers of Service Quality Rules 460.744(1)-(2), 460.745(1), and 460.746(1), as applied to current and future Advanced Meter Infrastructure opt-out customers who receive service under the Company's Non-Transmitting Meter Provision Tariff C5.7;

- B. Approving DTE Electric’s proposed changes to the Company’s Non-Transmitting Meter Provision Tariff C5.7 set forth in Exhibit A-3;
- C. Approving DTE Electric’s proposed alternative procedures for AMI opt-out customers to initiate a bill credit review and for the Company to process outage bill credits for AMI opt-out customers; and
- D. Granting any further relief as may be just and reasonable.

DTE ELECTRIC COMPANY

Dated: May 24, 2024

By: _____
John A. Janiszewski (P74400)
Attorney for DTE Electric Company
One Energy Plaza, 1635 WCB
Detroit, MI 48226
Ph: (313) 235-7309

STATE OF MICHIGAN

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Case No. U-21643

QUALIFICATIONS

AND

DIRECT TESTIMONY

OF

DENISE C. SAMPSON

DTE ELECTRIC COMPANY
QUALIFICATIONS AND DIRECT TESTIMONY OF DENISE C. SAMPSON

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1 **Q1. What is your name, business address and by whom are you employed?**

2 A1. My name is Denise C. Sampson, Manager of Damage Claims, One Energy Plaza,
3 Detroit, Michigan 48226. I am employed by DTE Electric Company (DTE Electric
4 or Company).

5
6 **Q2. On whose behalf are you testifying?**

7 A2. I am testifying on behalf of DTE Electric.

8
9 **Q3. What is your educational background?**

10 A3. I graduated from Tennessee State University with a Bachelor of Science in
11 Electrical Engineering in 2012.

12
13 **Q4. What is your work experience?**

14 A4. I began my career with DTE Electric in 2012 and have been employed there since.
15 I joined DTE Electric in the Electrical Engineering department and spent four years
16 supporting the Electrical Engineering department on a broad range of engineering
17 projects, primarily focused on the DTE Electric company. As a Meter Engineer and
18 Overhead Equipment Performance and Standards Engineer, I was responsible for
19 leading and managing the design and performance of electric meters and the
20 overhead electrical infrastructure. In 2016, I transitioned to Continuous
21 Improvement (CI) Engineering where I was responsible for identifying, evaluating,
22 and testing alternative solutions to maximize processes to improve efficiency. I
23 concluded my time in CI Engineering in 2018 as a Senior Engineer. In 2018, I was
24 promoted to Supervisor in System Operations, responsible for leading and
25 supervising a team of Process Coordinators and System Supervisors who were in

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1 training to become certified System Supervisors. While in training, these Process
2 Coordinators and System Supervisors are responsible for assisting certified System
3 Supervisors in their work monitoring and controlling the electric system through
4 SCADA switching and system protection.

5
6 In 2019, I returned to CI Engineering as a Principal Supervisor where I was
7 responsible for leading a team of engineers focusing on a broad range of lean and
8 productivity projects. In mid-2020, I was promoted to my current role as the
9 Manager for Claims and Reliability Credit Investigations in Electric Distribution
10 Strategy.

11

12 **Q5. Do you hold any certifications or are you a member of any professional**
13 **organizations?**

14 A5. In 2013, I obtained a Lean Six Sigma Yellow Belt Certification which introduces
15 the concept of efficient processes, and optimization while delivering consistent
16 levels of customer quality. In 2017, I obtained a Lean Six Sigma Green Belt
17 Certification which is an advanced continuous improvement concept utilizing data
18 analysis, problem solving, and system optimization to improve process efficiency.
19 Continuing to advance my skills in Lean Six Sigma, I obtained a Lean Six Sigma
20 Black Belt Certification through University of Michigan College of Engineering
21 Integrated Systems and Design in November 2019.

22

23 **Q6. What are your current job responsibilities?**

24 A6. I am the Manager of Claims and Reliability Credit Investigations. In this role, I am
25 responsible for the strategy and execution of the Electric Damage Claims and

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1 Reliability Credit Investigations. This includes managing multiple cross-function
2 technology projects for Electric Damages Claims and Reliability Credit business
3 processes and collaborating with internal key business partners for development
4 and implementation to improve internal systems and databases, strategy, planning,
5 auditing, execution, customer satisfaction, collaboration with customers,
6 community and government officials to maintain a high process and customer
7 focused workforce.

8

9 **Q7. Have you previously sponsored testimony before the Michigan Public Service**
10 **Commission (MPSC or Commission)?**

11 A7. No, I have not.

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1 **Purpose of Testimony**

2 **Q8. What is the purpose of your testimony?**

3 A8. The purpose of my testimony is to:

4 • Describe and support DTE Electric's request for permanent partial waivers of
5 certain Service Quality and Reliability Standards (SQRs), specifically
6 Commission Rules 460.744(1)-(2), 460.745(1), and 460.746(1), as applied to
7 Advanced Meter Infrastructure (AMI) opt-out customers who receive service
8 under the Company's Non-Transmitting Meter Provision Tariff C5.7.

9

10 • Describe and support DTE Electric's proposed alternative means for AMI opt-
11 opt customers to notify the Company of their intent to receive a bill credit under
12 Commission Rules 460.744(1)-(2), 460.745(1), and 460.746(1) (collectively,
13 Rules).

14

15 **Q9. Are you sponsoring any exhibits in this proceeding?**

16 A9. Yes. I am supporting the following exhibits:

17 Exhibit Description

18 A-1 AMI Customer Eligibility Data Table

19 A-2 AMI opt-out Customer Data

20

21 **Q10. Were these exhibits prepared by you or under your direction?**

22 A10. Yes, they were.

23

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1 **Partial Waiver Requests of Standard Quality and Reliability Standards (SQRS)**

2 **Q11. Please explain the applicable requirements of the current SQRSs regarding**
3 **customer accommodations for failure to restore service after sustained**
4 **interruption due to gray sky and catastrophic conditions.**

5 A11. Rule 460.744(1)-(2) provide, in pertinent part, that:

6 (1) Unless an electric utility or cooperative requests a waiver pursuant to part 5 of
7 these rules, an electric utility or cooperative that fails to restore service to a
8 customer within 96 hours after the start of a sustained interruption that occurred
9 during the course of catastrophic conditions *shall provide any affected customer*
10 *with a bill credit on the customer's bill within 90 days* (emphasis added).

11 (2) Unless an electric utility or cooperative requests a waiver pursuant to part 5 of
12 these rules, an electric utility or cooperative that fails to restore service to a
13 customer within 48 hours after the start of a sustained interruption that occurred
14 during the course of gray sky conditions *shall provide any affected customer with*
15 *a bill credit on the customer's bill within 90 days* (emphasis added).

16

17 DTE Electric understands Rule 460.744(1)-(2) to require the Company to
18 automatically identify affected customers and provide a bill credit within 90 days
19 of restoring service after a sustained interruption that occurred during gray sky or
20 catastrophic conditions.

21

22 **Q12. Please explain the applicable requirements of the current SQRSs regarding**
23 **customer accommodations for failure to restore service after sustained**
24 **interruption during normal conditions.**

25 A12. Rule 460.745(1) provides, in pertinent part, that:

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1 (1) Unless an electric utility or cooperative requests a waiver pursuant to part 5 of
2 these rules, an electric utility or cooperative that fails to restore service to a
3 customer within 16 hours after the start of a sustained interruption that occurred
4 during normal conditions *shall provide to any affected customer a bill credit on the*
5 *customer's bill within 90 days* (emphasis added).

6
7 DTE Electric understands Rule 460.745(1) to require the Company to automatically
8 identify affected customers and provide a bill credit within 90 days of restoring
9 service after a sustained interruption that occurred during normal conditions.

10

11 **Q13. Please explain the applicable requirements of the current SQRs for customer**
12 **accommodations for repetitive interruptions.**

13 A13. Rule 460.746(1) provides, in pertinent part, that:

14 (1) Unless an electric utility or cooperative requests a waiver pursuant to part 5 of
15 these rules, a customer of an electric utility or cooperative that experiences six
16 or more sustained interruptions in a 12-month period is entitled to a *billing*
17 *credit on the customer's bill within 90 days* (emphasis added).

18

19 DTE Electric understands Rule 460.746(1) to require the Company to automatically
20 identify affected customers and provide a bill credit within 90 days of restoring
21 service after a sixth sustained interruption in a 12-month period.

22

23 **Q14. How does the Company typically identify qualifying customers under Rules**
24 **460.744(1)-(2), 460.745(1), and 460.746(1)?**

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1 A14. For customers with AMI meters, the Company proactively identifies customers
2 who are eligible for a bill credit by utilizing AMI data that is sourced from the
3 meter. The AMI data is transmitted through a wireless communication that is
4 housed within a cloud directory. Fourteen days after the customer's restoration date,
5 automation technology identifies affected customers and determines customer
6 eligibility for an outage bill credit. For illustrative purposes, Exhibit A-1 includes
7 an AMI data table of a specific customer that the AMI-derived automation
8 technology logic utilizes to determine customer eligibility for a bill credit.

9

10 **Q15. How does the Company typically process outage bill credits under Rules**
11 **460.744(1)-(2), 460.745(1), and 460.746(1)?**

12 A15. Once an AMI customer is identified as eligible for a bill credit through AMI meter
13 data, the Reliability Credit Investigations team reviews and approves the bill credit
14 through the automation application for processing. The bill credit is then reflected
15 on a customer's bill within 1-2 billing cycles after approval and processing.

16

17 **Q16. Please describe the partial waiver requests of Rules 460.744(1)-(2), 460.745(1),**
18 **and 460.746(1) the Company seeks in this matter.**

19 A16. The Company is requesting permanent partial waivers of Rules 460.744(1)-(2),
20 460.745(1), and 460.746(1), because it is technologically infeasible and unduly
21 economically burdensome for the Company to comply with the rules as applied to
22 AMI opt-out customers who receive service under the Company's Non-
23 Transmitting Meter Provision Tariff C5.7.

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1 Specifically, Rules 460.744(1)-(2), 460.745(1), and 460.746(1) require that the
2 Company must provide an outage bill credit (bill credit) to affected customers
3 whose service was not restored within the prescribed time unless the Company
4 requests waivers from these Rules. Although the Rules do not distinguish AMI and
5 AMI opt-out customers, the Company's ability to automatically provide a bill credit
6 to AMI opt-out customers is not technologically feasible within the prescribed 90
7 days because of the lack of requisite data generated by non-transmitting meters.
8 Moreover, it is unduly economically burdensome for the Company and its
9 customers as a whole to make investments that would automatically provide a bill
10 credit to AMI opt-out customers. Therefore, the Company is requesting permanent
11 partial waivers of Rules 460.744(1)-(2), 460.745(1), and 460.746(1), along with
12 approval of a requirement for AMI opt-out customers to contact the Company to
13 request a bill credit review. Under this alternative approach, once DTE Electric
14 determines that the AMI opt-out customer is eligible, a bill credit will be issued
15 within 90 days of the credit request. Importantly, the Company does not seek to
16 circumvent issuing outage credits to AMI opt-out customers, but needs to secure
17 partial waivers of the Rules that reflect the practical realities of providing this
18 service to our limited subset of AMI opt-out customers.

19

20 **Q17. How many AMI opt-out customers presently receive service under the**
21 **Company's Non-Transmitting Meter Provision Tariff C5.7?**

22 A17. As of the date of this filing, approximately 13,000 AMI opt-out customers receive
23 service under the Company's Non-Transmitting Meter Provision Tariff C5.7.

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1 **Q18. If granted, would the Company’s partial waiver requests affect how it**
2 **identifies qualifying customers and provides outage bill credits to customers**
3 **with AMI meters under Rules 460.744(1)-(2), 460.745(1), and 460.746(1)?**

4 A18. No. The Company’s partial waiver requests solely apply to AMI opt-out customers
5 who receive service under the Company’s Non-Transmitting Meter Provision
6 Tariff C5.7.

7
8 **Q19. Why is it technologically infeasible for the Company to automatically identify**
9 **qualifying customers and process outage bill credits as applied to AMI opt-out**
10 **customers?**

11 A19. As supported by Witness Turner, AMI opt-out customers accept service under Non-
12 Transmitting Meter Provision Tariff C5.7 which confirms they are unable to access
13 all of the benefits of having a transmitting AMI meter. The AMI-derived meter data
14 required to identify instantaneous outage data and automatically determine bill
15 credit eligibility does not exist for the approximately 13,000 AMI opt-out
16 customers. AMI opt-out customers have non-transmitting meters that are incapable
17 of storing outage data to retrieve data wirelessly or locally. Therefore, the ability to
18 automatically identify customers who are eligible for a duration or frequency bill
19 credit is not technologically feasible due to not having the ability to automatically
20 retrieve data. AMI opt-out customers outage start time is the time captured when a
21 customer contacts the Company to report an outage. However, it does not
22 necessarily indicate when the customer actually experiences a loss of power. For
23 illustrative purposes, Exhibit A-2 includes an example of an AMI opt-out customer
24 reporting an outage and the meter information is indicted as “keyed”. Therefore,

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1 manual data review is required in order to determine the actual outage date and
2 restoration time to determine the customer's bill credit eligibility.

3

4 Even though AMI opt-out customers have intentionally forgone the benefits of
5 having an AMI meter, technology was developed in July 2023, applicable in limited
6 circumstances, to potentially correlate outage and restoration data for AMI opt-out
7 customers who experience an outage on the same transformer device as an AMI
8 customer. If an AMI customer is eligible for a bill credit and on a shared transformer
9 device with a non-AMI customer, the non-AMI customer will automatically receive
10 a bill credit as well. In these limited circumstances, the AMI opt-out customer
11 benefits from outage and restoration data generated by AMI meters connected to a
12 shared transformer device because the Company is able to infer the outage and
13 restoration data applies to the AMI opt-out customer as well. The automation
14 technology logic supports the approach of providing a bill credit to all qualifying
15 customers. However, the automation technology is not feasible for non-AMI
16 customers who experience a single customer outage or on a single transformer
17 device. Therefore, despite the Company's efforts, it is technologically infeasible
18 for the Company to automatically provide a bill credit to qualifying non-AMI
19 customers for all qualifying outages.

20

21 **Q20. Why is it unduly economically burdensome for the Company to create internal**
22 **processes to enable automated identification of AMI opt-out customers who**
23 **qualify for outage bill credits?**

24 **A20.** It is unduly economically burdensome for the Company to develop an internal
25 automation technology system that would identify AMI opt-out customers as

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1 eligible for outage bill credits and provide the outage bill credits within 90 days.
2 Because the customer opted out of having an AMI meter, the wireless
3 communication that allows the Company access to meter data that captures
4 instantaneous outage and restoration time that determines the customer's eligibility
5 is disabled. For AMI-opt out customers, the time that is captured as the outage time
6 is when the customer contacts the Company via phone, web, or mobile app to report
7 the outage. If the customer does not report an outage, the outage time will not be
8 known to determine outage duration which is utilized to confirm credit eligibility.

9
10 As noted above, the source of the current automation technology is AMI data.
11 Therefore, a viable solution to automatically identify and develop the complex logic
12 needed to establish the outage time and restoration time for all AMI opt-out
13 customers would require an extensive amount of time and effort to develop and
14 result in the Company incurring substantial costs. For reference, the time and cost
15 associated with the current automation application for AMI customers implemented
16 in July 2023 concluded as an 18-month effort of development and implementation,
17 and resulted in an investment of approximately \$1.2 million.

18
19 Additionally, if the Company incurred costs to comply with the Rules, as applied
20 to AMI opt-out customers, such costs should not be borne by DTE Electric's
21 customers as a whole. AMI opt-out customers accept service under Non-
22 Transmitting Meter Provision Tariff C5.7 knowing that they will be unable to
23 access all of the benefits of having a transmitting AMI meter. Refer to the testimony
24 of Company Witness Turner regarding Tariff C5.7. Under traditional cost of service
25 principles, DTE Electric's customers as a whole should not have to pay for the

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1 substantial costs required to develop and implement an automation application
2 caused exclusively by AMI opt-out customers. Thus, it is not reasonable or
3 economically justifiable for the Company's customers as a whole to incur
4 substantial costs for the exclusive benefit of the approximately 13,000 AMI opt-out
5 customers who have made a decision to forgo having access to the benefits of AMI
6 meters.

7

8 **Q21. Please describe the Company's proposed alternative means for AMI opt-out**
9 **customers to notify the Company of their intent to receive a bill credit under**
10 **Commission Rules 460.744, 460.745, and 460.746.**

11 A21. The proposed alternative option for an AMI opt-out customer to receive a bill credit
12 that they are eligible for is to contact the Company's customer service department
13 via phone to request a reliability credit review which requires a manual
14 investigation to determine the outage duration. The outage time is captured when
15 the customer contacts the Company to report an outage. However, that does not
16 determine when the customer's initial power outage occurred. An internal process
17 has been established for the Customer Service team to contact the Reliability Credit
18 Investigations team through an internal shared application that notifies the
19 Reliability Credit Investigations team of the customer inquiry. The investigation of
20 confirming eligibility includes reviewing multiple internal systems to determine
21 when a customer power outage occurred and the associated restoration time. The
22 response time to investigate, confirm eligibility, and process the bill credit, if the
23 customer is approved, is 90 days after the customer's initial request.

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1 The Company will communicate the process and expectations for requesting a bill
2 credit review to all current and new AMI-opt customers within 60 days after the
3 waiver approval. In addition to revising Non-Transmitting Meter Provision Tariff
4 C5.7, as supported by Company Witness Turner, DTE Electric will use multiple
5 channels of communication to ensure AMI opt-out customers are aware of the
6 process change and expectations for requesting a bill credit review. For existing
7 AMI opt-out customers, a bill insert will be sent via mail and a message on demand
8 will be sent via email and/or text regarding the process change and expectations.
9 New AMI opt-out customers will receive a letter advising of their opt-out request,
10 including expectations for requesting a bill credit review. The external DTE Energy
11 website that includes detailed information regarding Electric Reliability Credits
12 also will be updated to set forth the process for AMI opt-out customers for
13 continued awareness.

14

15 **Q22. How does requiring AMI opt-out customers to affirmatively contact the**
16 **Company for purposes of identifying their eligibility for an outage bill credit**
17 **remedy the problem faced by the Company?**

18 **A22.** Requiring AMI opt-out customers to contact the Company to request a reliability
19 credit review initiates the process to investigate and confirm the customer's
20 eligibility. If customers are eligible, the credit is approved and processed. If AMI
21 opt-out customers do not contact the Company, there is no existing automated
22 process to identify those customers and proactively provide outage bill credits
23 within the prescribed 90 days to be compliant with the Rules. Requiring AMI opt-
24 out customers to contact the Company to request a bill credit will ensure an

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1 alternative means for AMI opt-out customers to receive bill credits in a manner that
2 is technologically feasible and economically reasonable.

3

4 Q23. **Please summarize your conclusions.**

5 A23. As discussed in my testimony, the Company is requesting permanent partial
6 waivers of certain Service Quality and Reliability Standards, specifically
7 Commission Rules 460.744(1)-(2), 460.745(1), and 460.746(1), as applied to AMI
8 opt-out customers who receive service under the Company's Non-Transmitting
9 Meter Provision Tariff C5.7 due to the inability to identify affected Non-AMI
10 customers automatically that are eligible for a bill credit. AMI customer eligibility
11 is determined by the AMI meter that captures instantaneous outage and restoration
12 time. It is unduly economically burdensome to design and develop a robust
13 technical automation approach that benefits less than 0.5% of our electric customer
14 base due to the extended time and substantial cost associated with the technology
15 development for which all customers are to absorb the cost. The proposed
16 alternative option for an AMI opt-out customer to receive a bill credit that they are
17 eligible for is to contact the Company's Customer Service department via phone to
18 request a reliability credit review which initiates a manual investigation to confirm
19 the customer's eligibility. Under the Company's proposed alternative option for
20 AMI opt-out customers, the response time to investigate, confirm eligibility, and
21 process the bill credit, if the customer is approved, is 90 days after the customer's
22 initial request.

23

24 Q24. **Does this conclude your testimony?**

25 A24. Yes.

Exhibit A-1 Description: AMI data table extract that is the output of the logic embedded within the automation table. Within the data table, the customer outage down date and time and restoration date and time are populated to calculate the customer outage duration. Columns shown are applicable to the data logic to determine customer’s eligibility.

aoe_id	aoe_meter_number	aoe_down_date	aoe_up_date	aoe_duration_minutes	aoe_service_center	aoe_circuit	aoe_xfmr	aoe_premise	event_number	decl_stor_mno	cause_code	outage_subtype	call_code	job_type	energy_status	device_exten_t	region	feeder_code	aoe_creation_user	aoe_creation_date
23735606		2023-07-27T23:23:23.000+0000	2023-07-27T23:29:06.000+0000	5.72	RFD	SIXMI1236			SE23072712383	2023007	WIND	OHCKT	AMI NO POWER OUTAGE	Restored	OHCKT	SE	SIXMI1236	System	2023-08-02T06:38:41.803+0000	
23737657		2023-07-27T23:41:41.000+0000	2023-07-28T00:08:54.000+0000	27.22	RFD	SIXMI1236			SE23072712383	2023007	WIND	OHCKT	AMI NO POWER OUTAGE	Restored	OHCKT	SE	SIXMI1236	System	2023-08-02T06:38:41.803+0000	
23736842		2023-07-28T00:40:28.000+0000	2023-07-28T00:59:07.000+0000	18.65	RFD	SIXMI1236			SE23072609790	2023007	WIND	OHCKT	NO POWER OUTAGE	Restored	OHCKT	SE	SIXMI1236	System	2023-08-02T06:38:41.803+0000	
23736378		2023-07-28T01:32:13.000+0000	2023-07-28T01:48:20.000+0000	16.12	RFD	SIXMI1236			SE23072609790	2023007	WIND	OHCKT	NO POWER OUTAGE	Restored	OHCKT	SE	SIXMI1236	System	2023-08-02T06:38:41.803+0000	
23735987		2023-07-28T02:21:48.000+0000	2023-07-28T02:41:20.000+0000	19.53	RFD	SIXMI1236			SE23072609790	2023007	WIND	OHCKT	NO POWER OUTAGE	Restored	OHCKT	SE	SIXMI1236	System	2023-08-02T06:38:41.803+0000	
23735902		2023-07-30T08:12:01.000+0000	2023-07-30T08:27:24.000+0000	15.38	RFD	SIXMI1236			SE23073000094	2023007	WIND	OHCKT	AMI NO POWER OUTAGE	Restored	OHCKT	SE	SIXMI1236	System	2023-08-02T06:38:41.803+0000	
23735495		2023-07-30T13:13:22.000+0000	2023-07-30T13:20:41.000+0000	7.32	RFD	SIXMI1236			SE23073000094	2023007	WIND	OHCKT	AMI NO POWER OUTAGE	Restored	OHCKT	SE	SIXMI1236	System	2023-08-02T06:38:41.803+0000	
23736122		2023-07-30T15:25:48.000+0000	2023-07-30T17:09:17.000+0000	103.48	RFD	SIXMI1236			SE23073000094	2023007	WIND	OHCKT	AMI NO POWER OUTAGE	Restored	OHCKT	SE	SIXMI1236	System	2023-08-02T06:38:41.803+0000	

Exhibit A-2 Description: Multiple applications are manually utilized for AMI opt out customers to determine meter communication status, account status, and customer outage information.

CRM application: Customer meter communication status is “Keyed”, meaning that the customer meter communication is nontransmissible. The customer is AMI opt out.

Create Service Order

Important Info

BP&M & SERVICE ORDER MATRIX (JA) | TOD RATE CHANGE - A858 AMI (SWI) | ICM R184 RECONNECT SCHEDULING/RESCHEDULING PROCESS (JA)

Create Service Order for: Gas Electric HPP

Premise-level service is selected until a meter or row is selected:

Meter Number	Communication Met...	Meter Type	Rate Category Desc...	Paired Devices	Effective date	Device Location	Service Status	Meter Status	Disconnection Status	Service Location	Installation #
[REDACTED]	Keyed	METER_WH, 2S, C...	Electric Residential ...		08/25/2019	Outside Right	Active	Active	■	underground	[REDACTED]

The table below is populated once the customer reports an outage. The table displays customer reported outages and the source of how the customer reported the outage.

Trouble Id	Trouble Description	Job Type	Location	Status	Source	Off Date	On Date
2400162087	No Current	OUTAGE	[REDACTED]	CLOSED	WEB	01/12/2024 10:28 PM	01/14/2024 02:12 PM
2305605174	No Current	OUTAGE	[REDACTED]	CLOSED	WEB	08/28/2023 09:58 AM	08/30/2023 06:15 PM

Customer was eligible for a duration credit for an August 2023 outage. The customer initial outage began on 8/24/2023. However, as shown in the outage table above, customer did not report outage until 8/28/2023. Because the customer did not initially report outage on 8/24/2023, the Company did not have any visibility of customer’s accurate outage duration to issue credit proactively. Therefore, the request for AMI Opt-out customers to contact the Company to report outage and request credit is necessary to prevent the possibility of not issuing a credit and being non-compliant of the Rules.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the Application of)
DTE ELECTRIC COMPANY)
for partial waivers of certain Service Quality and)
Reliability Standards for Electric Distribution)
Systems pursuant to R 460.751 and related relief)

Case No. U-21643

QUALIFICATIONS

AND

DIRECT TESTIMONY

OF

ANTHONY L. TURNER

DTE ELECTRIC COMPANY
QUALIFICATIONS AND DIRECT TESTIMONY OF ANTHONY L. TURNER

Line
No.

1 **Q1. What is your name, business address and by whom are you employed?**

2 A1. My name is Anthony L. Turner (he/him/his), One Energy Plaza, Detroit, Michigan
3 48226. I am employed by DTE Energy Corporate Services LLC, a subsidiary of
4 DTE Energy Company (DTE Energy) within Regulatory Affairs as a Senior
5 Strategist.

6
7 **Q2. On whose behalf are you testifying?**

8 A2. I am testifying on behalf of DTE Electric Company (DTE Electric or Company).

9
10 **Q3. What is your educational background?**

11 A3. I graduated from Wayne State University with a Bachelor of Science in Business
12 Administration with a concentration in Finance.

13
14 **Q4. What is your work experience?**

15 A4. I have been employed by DTE Energy since 2015 and have since occupied several
16 different positions of increasing responsibility. I started in the Customer Service
17 organization with a focus on providing billing support to small-medium business
18 customers to resolve and troubleshoot billing irregularities. In 2017, I transitioned
19 to the System Compliance group and was responsible for executing monthly
20 Sarbanes Oxley (SOX) controls on the billing system to ensure compliance with
21 the Company's billing rules set forth by the Michigan Public Service Commission
22 (MPSC or Commission). In 2019, I was promoted to Senior Analyst in System
23 Management. In this role, I provided rate case implementation support as well as
24 support to the overall Customer Service IT Portfolio. Most recently, I joined
25 Regulatory Affairs as a Senior Strategist. My current responsibilities include rate

Line
No.

1 development and administration of Company tariffs, rules, and regulations. I also
2 provide regulatory support to other business units.

3

4 **Q5. What are your current job responsibilities?**

5 A5. My current responsibilities include the development of residential, commercial,
6 industrial, and governmental rates for electric service. I am also responsible for
7 developing and recommending pricing policy and development, application and
8 administration of rate tariffs and special contracts, as well as the rules and
9 regulations governing service.

10

11 **Q6. Have you previously sponsored testimony before the Michigan Public Service**
12 **Commission?**

13 A6. No, I have not.

Line
No.

1 **Purpose of Testimony**

2 **Q7. What is the purpose of your testimony?**

3 A7. The purpose of my testimony is to sponsor the corresponding tariff changes as it
4 relates to the Company's partial permanent waiver request to Service Quality and
5 Reliability Standards (SQRs); specifically MPSC Rule(s) R 460.744(1)-(2), R
6 460.745(1), and R 460.746(1), as supported by Company Witness Sampson.

7

8 **Q8. Are you sponsoring any exhibits in this proceeding?**

9 A8. Yes. I am supporting the following exhibits:

<u>Exhibit</u>	<u>Description</u>
A-3	Proposed Tariff Sheet

12

13 **Q9. Was this exhibit prepared by you or under your direction?**

14 A9. Yes, it was.

15

16 **Q10. What changes are you proposing to the Company's tariffs?**

17 A10. I am proposing to change (emphasis added) the Company's Non-Transmitting
18 Meter Provision Tariff C5.7 as described below:

19 Customers electing this provision will be physically unable to access all of the
20 benefits of having a transmitting meter. *Customers with a non-transmitting*
21 *meter(s) seeking a bill credit under MPSC Rule(s) R 460.744(1)-(2), R*
22 *460.745(1), and R 460.746(1), will need to contact the Company to initiate the bill*
23 *credit process.* All charges and provisions of the customer's otherwise applicable
24 tariff shall apply.

25

Line
No.

1 The proposed tariff sheet is provided as Exhibit A-3.

2

3 **Q11. Does this conclude your testimony?**

4 A11. Yes.

Case No.: U-21643
Exhibit: A-3
Witness: A. J. Turner
Page: 1 of 2

DTE Electric Company

Proposed Tariff Sheet - C5.7 Non-Transmitting Meter Provision (Residential Only)

AMI-Opt Out Partial Waiver Request

(Continued from Sheet No. C-24.00)

C5 CUSTOMER RESPONSIBILITY (Contd.)

C5.7 Non-Transmitting Meter Provision (Residential Only)

Rates: Initial fee: \$40.69 per request

Monthly Charge: \$9.82 per month

A Customer electing to have a non-transmitting meter(s) and who already has a transmitting meter installed at their premise will have their meter changed to a non-transmitting meter.

A Customer who does not grant access to the Company to replace their existing meter with a transmitting meter shall pay the Monthly Charge until such time as the Company can gain access to replace their meter with a transmitting AMI meter, or if they elect a non-transmitting meter, the appropriate charges will continue.

Customers electing this provision will be physically unable to access all of the benefits of having a transmitting meter. Customers with a non-transmitting meter(s) seeking a bill credit under MPSC Rule(s) R 460.744(1)-(2), R 460.745(1), and R 460.746(1) will need to contact the Company to initiate the bill credit process. All charges and provisions of the customer's otherwise applicable tariff shall apply.

C6 DISTRIBUTION SYSTEMS, LINE EXTENSIONS AND SERVICE CONNECTIONS

C6.1 Extension of Service

This section of the rules and regulations sets forth the terms and conditions under which the Company will construct and extend its facilities to serve new loads and replace, relocate or otherwise modify its facilities.

Upon application for new or increased service, the Company will make extensions or alterations of its electric supply facilities under the following conditions, provided that the service applied for will not disturb or impair the service to existing customers.

(Continued on Sheet No. C-25.00)

Issued _____, 2024
M. A. Bruzzano
Senior Vice President
Regulatory Affairs
Detroit, Michigan

Effective for bills rendered on
and after _____, 2024
Issued under authority of the
Michigan Public Service Commission
dated _____, 2024
in Case No. U-21XXX

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the Application of)
DTE ELECTRIC COMPANY)
for partial waivers of certain Service Quality and)
Reliability Standards for Electric Distribution)
Systems pursuant to R 460.751 and related relief)

Case No. U-21643

PROOF OF SERVICE

ESTELLA R. BRANSON states that on May 24, 2024, she served a copy of the DTE Electric Company's Application, Direct Testimony and Exhibits of Witnesses, Denise C. Sampson and Anthony L. Turner in the above captioned matter, via electronic mail upon the persons listed on the attached service list.

ESTELLA R. BRANSON

MPSC Case No. U-21643
Service List

MPSC STAFF

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