

STATE OF MICHIGAN  
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

\* \* \* \*

In the matter of the application of )  
**DTE ELECTRIC COMPANY** )  
for authority to increase its rates, amend )  
its rate schedules and rules governing the )  
distribution and supply of electric energy, )  
and for miscellaneous accounting authority.)

Case No. U-21534

**QUALIFICATIONS AND DIRECT TESTIMONY OF**  
**RYAN BOUTET**  
**MICHIGAN PUBLIC SERVICE COMMISSION**

July 26, 2024

QUALIFICATIONS OF RYAN BOUTET

CASE NUMBER U-21534

PART I

1 Q. Please state your full name and business address for the record.

2 A. My name is Ryan Boutet (he/him/his), and my business address is 7109 West Saginaw  
3 Highway, Lansing, Michigan 48917.

4

5 Q. By whom are you employed and in what capacity?

6 A. I am employed by the Michigan Public Service Commission (MPSC or Commission) as a  
7 Public Utilities Engineer in the Electric Operations Section of the Energy Operations  
8 Division.

9

10 Q. Please describe your educational background.

11 A. I earned a Bachelor of Science in Mechanical Engineering from Michigan State University  
12 in December of 2019, as well as additional minors in Computer Science & Engineering,  
13 and German from Michigan State University.

14

15 Q. What is your professional background?

16 A. During my time at Michigan State University I focused my electives on the energy sector  
17 and renewable technologies, allowing me to spend a summer abroad on a research program  
18 at RWTH Aachen University in Germany in the Summer of 2016, a top technical institute  
19 in Europe. There, I conducted comparative research on wind energy conversion rates for  
20 various horizontal and vertical-axis turbine configurations, as well as aspects such as  
21 economic factors, payback periods, material and construction costs, estimated energy  
22 production, and more. Following this, and still during my education at Michigan State  
23 University, I took a part-time position with a drone company known as Vision Air Systems,

QUALIFICATIONS OF RYAN BOUTET

CASE NUMBER U-21534

PART I

1 where I worked as a Drone Data Analyst. Vision Air Systems provided drone services  
2 primarily focused on visual inspections in construction zones and other hard-to-access  
3 industrial areas. My responsibilities included creating and verifying flight paths for drones  
4 used in visual inspections, communicating needs between drone operators and clients, and  
5 working with drone operators to ensure data and flight paths are properly databased and  
6 made available to clients. I remained with Vision Air Systems until late 2018 when  
7 business heavily declined due to oversaturation and heavy competition in the Drone  
8 Services industry. Post graduation, in 2020, during the height of the pandemic, I took a  
9 position as a Delivery Associate for Amazon, under a contracting company known as DEK  
10 Delivery LLC, where I remained until joining the MPSC in October of 2023. As a Public  
11 Utilities Engineer in the Electric Operations Section of the MPSC, my responsibilities  
12 include reviewing electric rate cases, handling customer complaints and safety concerns,  
13 and contributing to multiple other efforts to ensure the electrical grid in Michigan stays  
14 reliable and safe. Some such examples include projects focused on the needs of critical  
15 facilities such as hospitals and nursing homes, projects on defining and supporting grid  
16 resilience, and projects focused on performance metrics and incentivized performance for  
17 utility companies.

18  
19 Q. Have you received any work-related training since starting your employment with the  
20 MPSC?

21 A. Yes. The trainings I have completed so far include:

- 22 • OSMOSE: Contact Voltage is Unseen and Unforgiving
- 23 • MPSC Rate Case Training Series

QUALIFICATIONS OF RYAN BOUTET

CASE NUMBER U-21534

PART I

- 1 • Regulatory Training Initiative: Performance Based Ratemaking for Energy Utilities (2023)
- 2 • NARUC/NASEO: Distribution System Planning & Resilience Planning Training
- 3 • Regulatory Assistance Project: Improving Utility Performance Incentives
- 4 • Regulatory Training Initiative: Rate Case Basics (2024)
- 5 • Energy Utility Consultants Inc.: Right of Way Management (2024)
- 6 • Regulatory Training Initiative: The Basics of Utility Accounting & Ratemaking (2024)
- 7
- 8

9 Q. Have you previously testified before the Commission?

10 A. Yes. I have filed in the following cases:

11 <u>Case No</u>	<u>Company</u>	<u>Type of Case</u>	<u>Subject of Testimony</u>
12 U-21461	I&M Power	Electric Rate	Storm Expenses & Restoration, Tree Trim
13 U-21555	UPPCO	Electric Rate	Fleet & Facility Expenses

14

15

16

DIRECT TESTIMONY OF RYAN BOUTET

CASE NUMBER U-21534

PART II

1 Q. What is the purpose of your testimony in this proceeding?

2 A. The purpose of my testimony is to provide the Michigan Public Service Commission  
3 Staff's (Staff) insights and recommendations on the topics of Vehicle Fleet and  
4 Maintenance, and Base Capital Programs.

5  
6 Q. Are you sponsoring any exhibits?

7 A. Yes, I am sponsoring five exhibits:

8	<u>Exhibit No.</u>	<u>Description</u>
9	Exhibit S-12.1	DTE Response to Staff Discovery Questions
10		Topic: Fleet Capital Purchases
11	Exhibit S-12.2	DTE Response to Staff Discovery Questions
12		Topic: Fleet Repair Expenses
13	Exhibit S-12.3	DTE Response to Staff Discovery Questions
14		Topic: Fleet Service Providers
15	Exhibit S-12.4	DTE Response to Staff Discovery Questions
16		Topic: Base Capitals Program – Actual 2023 Expenses
17	Exhibit S-12.5	DTE Response to Staff Discovery Questions
18		Topic: Summary of Relocations Projects
19	Exhibit S-12.6	DTE Response to Staff Discovery Questions
20		Topic: Fleet Capital – Actual 2023 Expenses
21	Exhibit S-12.7	DTE Response to Staff Discovery Questions
22		Topic: Fleet Capital – Actual 2024 Expenses

23

**DIRECT TESTIMONY OF RYAN BOUTET**  
**CASE NUMBER U-21534**  
**PART II**

**Vehicle Fleet Capital Expenses**

Q. Please provide an overview of the Company's Vehicle Fleet Capital Expenses.

A. Company witness Uzenski supports the Company's proposed expenses for Vehicle Fleet Capital expenditures in her direct testimony. In summary, this category includes expenses such as cars, trucks, bucket trucks, trailers, and forklifts that are purchased to replace aging fleet assets and maintain a safe and reliable fleet. DTE uses a proprietary model to track asset lifecycles and optimize total costs of ownership. As seen on Company Exhibit A-12 Schedule B5.8, The Company projected 2023 calendar year capital expenditures of \$32.79 million, 2024 calendar year capital expenditures of \$38.24 million, and 2025 test year capital expenditures of \$42.6 million, all following a historic spend of \$43.82 million in 2022. The Company provided greater insight during discovery, providing a spreadsheet showing all planned fleet purchases for the above timelines, summarized in Staff Exhibit S-12.1. Actual 2023 expenditures for new fleet purchases came out to approximately \$29.35 million spread across approximately 570 fleet purchases. Calendar year 2024 actuals come in at \$4.94 million between January 1, 2024, and April 30, 2024, while projections for the rest of 2024 are approximately \$30.45 million for a projected total of \$35.4 million in new fleet purchases spread across approximately 360 fleet purchases for 2024. Staff notes that the Company over projected their 2023 costs by approximately \$3.5 million and is on track for a similar over projection of approximately \$3 million in 2024. Projected purchases for the test period, calendar year 2025, sit at a total of \$42.595 million spread across approximately 260 fleet purchases.

**DIRECT TESTIMONY OF RYAN BOUTET**

CASE NUMBER U-21534

PART II

1 Q. Does Staff have any recommendations concerning the Company's Vehicle Fleet Capital  
2 Expenses?

3 A. Yes. Staff is recommending a disallowance of \$2.84 million for the bridge period and a  
4 disallowance of \$3.83 million for the test year. This adjustment is based on historical  
5 underspending in 2023 in this category as well as evidence that the Company is again on  
6 track to underspend in 2024. Staff Exhibit S-12.6 showcases that actual 2023 expenditures  
7 came in \$3.44 million under the Company projections, an approximate underspend of  
8 10.5%. Discovery responses seen in Staff Exhibit S-12.7 show that 2024 expenditures are  
9 on track to come in \$2.84 million under the Company projections, an approximate  
10 underspend of 7.5%. Staff is recommending that this \$2.84 million be disallowed from the  
11 bridge period. Further, Staff is recommending that \$3.83 million be disallowed from the  
12 test year, based on averaging the underspend from 2023 and 2024 to arrive at a 9%  
13 disallowance for 2025.

14  
15 Q. Do you have any additional information to add regarding your adjustment?

16 A. Yes. Regarding my recommendation for the above adjustment, it should be noted that my  
17 analysis concluded after internal deadlines finalizing Staff's revenue deficiency. The  
18 impacts of this adjustment are not reflected in the testimony and exhibits of other Staff  
19 witnesses or in the Staff's revenue deficiency supported by Staff witness Nichols. All  
20 impacts of this adjustment will be included in Staff's Brief.

21

22

23 **Vehicle Fleet Operations & Maintenance Expenses**

**DIRECT TESTIMONY OF RYAN BOUTET**

CASE NUMBER U-21534

PART II

1 Q. Please provide an overview of the Company's Vehicle Fleet Operations & Maintenance  
2 Expenses.

3 A. The Company tracks O&M for fleet vehicles in two categories, capital repair work and  
4 O&M work. Capital repair work includes engine and transmission repairs, body work, and  
5 any other large, unexpected expenses. O&M work consists of routine and predictable  
6 maintenance, including oil changes, tire rotations, brake replacements, and fluid refills.

7  
8 Q. Please provide more detail on the Company's Vehicle Fleet Capital Repair expense trends.

9 A. Both historic actual and projected future costs for capital repair work done to Fleet Vehicles  
10 from 2020 to 2025 are provided in Staff Exhibit S-12.2. The spike in capital repair expenses  
11 around 2022 were related to supply chain issues and the chip shortage during the COVID-  
12 19 pandemic, which resulted in the Company spending more on capital repairs for older  
13 vehicles, as new ones were not readily available.

14  
15 Q. Please provide more detail on the Company's Vehicle Fleet O&M work expense trends.

16 A. Both historic actual and projected future costs for O&M work done to Fleet Vehicles from  
17 2020 to 2025 are provided in Staff Exhibit S-12.2. The dip in O&M work spending around  
18 2022 was related to the supply chain issues and the chip shortage during the COVID-19  
19 pandemic, which resulted in the Company spending less on O&M work as its fleet was  
20 aging and requiring a greater portion of capital repair work.

21  
22 Q. Who services Company owned fleet vehicles?

**DIRECT TESTIMONY OF RYAN BOUTET**

CASE NUMBER U-21534

PART II

1 A. Revealed in discovery, seen in Staff Exhibit S-12.3, the Company states it has 92% of  
2 O&M related work done in-house by DTE mechanics, while 91% of capital repair related  
3 work is done in-house by DTE mechanics. The Company typically only outsources work  
4 related to insurance claims, warranty claims, or heavy-duty suspension, transmission, or  
5 engine work.

6  
7 Q. Does Staff have any recommendations concerning the Company's Vehicle Fleet  
8 Operations & Maintenance expenses or procedures?

9 A. Staff does not have any suggestions currently.

10

11 **Base Capital Programs**

12 Q. Please provide an overview of the Company's Base Capital Program.

13 A. The Base Capital Program concerns itself with several broad categories such as emergent  
14 equipment replacements, customer connections, relocations, new load connections, public  
15 lighting, and other general tools and equipment necessary for this work. The breakdown  
16 for this category can be seen on lines 1-17 on page 1 of Company Exhibit A-12 Schedule  
17 B5.4

18

19 Q. Are there any spending trends of note in the Base Capital Programs category?

20 A. Generally speaking, the total cost of the Base Capital Program only increases by  
21 approximately 3% from the historic 2022 year to the projected 2025 test year. However,  
22 the same cannot be said for all sub-programs in this category. Notably, the 'Relocations'  
23 sub-program costs doubles from 2022 to 2023 and continues growing into 2024. Relocation

**DIRECT TESTIMONY OF RYAN BOUTET**

CASE NUMBER U-21534

PART II

1 projects are often tied to requests by other city, state, or government agencies that involve  
2 public infrastructure. It is noted that the number of these projects has been increasing in  
3 recent years due to recent influxes in infrastructure spending at both the state and federal  
4 levels.

5  
6 Q. Please provide greater detail on the ‘Relocations’ sub-program and its spending trends.

7 A. Despite the trends listed above and seen in the Company Exhibits filed with this rate case,  
8 DTE was able to show that actual spending for 2023 in this category came in well below  
9 forecast. Revealed in discovery, now seen in Staff Exhibit S-12.4, DTE spent only \$38.08  
10 million of the \$45.77 million projected for 2023. Further, it is worth noting that the  
11 Company revealed in discovery that most relocation requests do indeed come at the behest  
12 of government agencies. Staff Exhibit S-12.5 shows that for calendar year 2023, of the  
13 \$38.08 million spent, \$24.65 million was for “Relocation Projects (excl. Major  
14 Infrastructure)” and \$20.34 million of that was at the request of city, state, or county  
15 agencies.

16  
17 Q. Does Staff have any recommendations concerning the Company’s Base Capital Programs?

18 A. Staff does not have any suggestions currently.

19  
20 **Summary**

21 Q. Please summarize your recommendations.

**DIRECT TESTIMONY OF RYAN BOUTET**

CASE NUMBER U-21534

PART II

1 A. 1. Staff recommends a disallowance of \$2.84 million for the bridge period in the category  
2 Vehicle Fleet Capital Expenditures. Staff Further recommends a disallowance of \$3.83  
3 million for the test year in the category Vehicle Fleet Capital Expenditures.

4 2. Staff currently has no recommendations on the topic of Vehicle Fleet Operations &  
5 Maintenance Expenses.

6 3. Staff currently has no recommendations on the topic of Base Capital Programs.

7

8 Q. Does this conclude your testimony?

9 A. Yes.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

\* \* \* \*

In the matter of the application of )  
**DTE ELECTRIC COMPANY** )  
for authority to increase its rates, amend )  
its rate schedules and rules governing the )  
distribution and supply of electric energy, )  
and for miscellaneous accounting authority.)

Case No. U-21534

**QUALIFICATIONS AND DIRECT TESTIMONY OF**

**JESSICA DUELL**

**MICHIGAN PUBLIC SERVICE COMMISSION**

July 26, 2024

**DIRECT TESTIMONY OF JESSICA DUELL**

CASE NUMBER U-21534

**PART I**

1 Q. Please state your full name and business address for the record.

2 A. My name is Jessica Duell (she/her/hers), and my business address is 7109 West Saginaw  
3 Highway, Lansing, Michigan 48917.

4 Q. By whom are you employed and in what capacity?

5 A. I am employed by the Michigan Public Service Commission (MPSC or Commission) as a  
6 Public Utilities Departmental Analyst in the Electric Operations Section of the Energy  
7 Operations Division.

8 Q. Please describe your educational background.

9 A. I earned a Bachelor of Liberal Arts with a major in Biology and minor in psychology at  
10 Olivet College in 2015.

11 Q. What is your professional background?

12 A. In 2015 I worked as a certified nurse assistant (CNA) at Green Acres of Ionia in Ionia,  
13 Michigan. As a CNA, I would take care of patients with their daily needs. In 2016, I  
14 started working for State of Michigan Department of Health and Human Services  
15 (MDHHS) at the Hawthorn Center as a Childcare Worker. My responsibilities were to  
16 watch over the children and take care of them while they stayed at the hospital. I worked  
17 at the Hawthorn Center until January of 2018 when I then transferred to become an  
18 Eligibility Specialist for MDHHS. I worked as an Eligibility Specialist from 2017-2022.  
19 As an eligibility specialist I had to work with policy and procedures to determine each  
20 client's eligibility for state benefits. I would process applications, conduct reviews,  
21 interview clients, speak to clients on the phone, and process verifications received to  
22 determine eligibility for each program. As an eligibility specialist I would contact utility  
23 companies when a client's utilities were turned off or in shut-off status. I would

**DIRECT TESTIMONY OF JESSICA DUELL**

CASE NUMBER U-21534

**PART I**

1 communicate with the utilities to figure out how much the client owed and to determine  
2 what I could do to get the client's utility service turned back on or not shut off, depending  
3 on the circumstances. Clients would submit an SER (State Emergency Relief) application  
4 and I would then have to process the application to prevent a shut off of their utilities. I  
5 also worked as a mentor for new workers. My responsibilities as a mentor were to train  
6 new workers in every aspect of the job and make sure they could complete the job  
7 precisely and accurately. In February of 2022, I left MDHHS and started working at the  
8 MPSC in Electric Operations as Departmental Analyst.

9 As a Departmental Analyst in the Electric Operations Section of the MPSC,  
10 my responsibilities include analysis of electric rate cases for reasonableness and  
11 prudence, regular reporting of nuclear and storms, assist with order compliance, and  
12 other tasks that may entail workgroups or research.

13 Q. Have you received any work-related training since starting your employment with the  
14 MPSC?

15 A. Yes. The trainings I have completed so far include:

- 16 • FEMASID Training
- 17 • Introduction to Incident Command System, ICS-100
- 18 • Basic Incident Command System for Initial Response ICS-200
- 19 • An Introduction to the National Incident Management System
- 20 • National Response Framework, An Introduction,
- 21 • MI CIMS (WebEOC) End-User Training,
- 22 • Multicultural Self-Awareness,
- 23 • NRRI-RTI Training

**DIRECT TESTIMONY OF JESSICA DUELL**

CASE NUMBER U-21534

PART I

- 1 • The Basics for the Electric Industry
- 2 • Root Cause Training
- 3 • MIC AM Champion
- 4 • Fundamentals of Overhead Distribution Systems
- 5 • Introduction to Substation Design
- 6 • Underground Electric Distribution Fundamentals
- 7 • Electric Distribution Safety
- 8 • NARUC/NASEO & LBNL Distribution System Planning
- 9 • Integrated Right-of-Way Vegetation Management
- 10 • NARUC RTI - The Basics of Utility Accounting and Ratemaking 2024
- 11 • Rate Case Basics 2024

12

13 Q. Have you previously testified before the Commission?

14 A. Yes. I have filed testimony in the following cases:

15	<u>Case No</u>	<u>Company</u>	<u>Type of Case</u>	<u>Subject of Testimony</u>
16	U-21286	UPPCO	Electric Rate	Tree Trim and Facilities
17	U-21297	DTE	Electric Rate	Tree Trim, Streetlighting, Storm
18				Restoration
19	U-21389	Consumers	Electric Rate	Line Clearing, Streetlighting, Storm Restoration
20	U-21555	UPPCO	Electric Rate	Distribution Capital Expenditures

21

22

23

**DIRECT TESTIMONY OF JESSICA DUELL**

CASE NUMBER U-21534

**PART II**

1 Q. What is the purpose of your testimony in this proceeding?

2 A. The purpose of my testimony is to present the Michigan Public Service Commission  
3 Staff's (Staff) recommendations regarding DTE Electric Company's (DTE Electric, DTE,  
4 or the Company) Tree Trimming and Service Restoration programs.

5 Q. Are you sponsoring any exhibits?

6 A. No, I am not sponsoring any exhibits in my direct testimony.

7

8

**Tree Trimming Expenses**

9 Q. Please briefly describe the Company's Tree Trim program.

10 A. Rachel Steudle explains DTE's tree trimming program on page 4 lines 18-23 of her direct  
11 testimony.

12 The Tree Trimming Pillar focuses on keeping vegetation (trees, brush, vines) clear of our  
13 overhead electrical equipment, including poles, wires, transformers, etc. The objectives  
14 of these investments are to reduce tree-related safety hazards and to reduce the volume of  
15 tree-related trouble cases, thereby increasing customer reliability. All vegetation  
16 management investments are made through the Company's Tree Trimming Program.

17

18 Q. When does the Company plan on completing their current tree trim surge program?

19 A. Rachel Steudle states in testimony on page 6 lines 23-24, that DTE plans on completing  
20 the surge program by the end of 2025. Once the surge program is completed the  
21 Company will be in their post-surge period. It is extremely crucial that DTE completes all  
22 reclaim miles by the end of 2025 so the Company can be in their post-surge period. DTE  
23 plans on continuing its maintenance of tree trimming by using a risk-based/variable cycle  
24 approach. Rachel Steudle states in testimony on page 28 lines 14-21, with a risk-based  
25 cycle approach the Company would be adjusting cycle lengths based on tree species  
26 growth rates, risk of outages, and cost of trimming using LiDAR technology.

**DIRECT TESTIMONY OF JESSICA DUELL**

CASE NUMBER U-21534

**PART II**

1 Q. Please explain DTE’s proposal for remaining funding for the completion of the tree trim  
2 surge program.

3 A. Rachel Steudle explains DTE’s proposal on page 23 lines 24-25 of her direct testimony.

4 The Company proposes to address the \$110 million through a combination of incremental  
5 regulatory asset in 2025 (\$87 million) and increasing the base O&M (\$23 million) in  
6 2026. The regulatory asset would be required to address the remaining reclaim miles  
7 needed to complete the Surge. The increase in base O&M is to fund trimming on-cycle  
8 miles based on the new projections. Increasing the O&M for the first year post-Surge  
9 would set the appropriate baseline budget for a fully on-cycle system into the future.

10  
11 Rachel Steudle states on page 18 lines 1-21, the reason behind this requested amount is  
12 because back in 2015-2017 DTE had third-party consultant (ECI) complete a study  
13 regarding their vegetation management program. After ECI analysis DTE found that the  
14 surge would cost \$1,131 million, \$721 million treated as O&M and \$410 million booked  
15 as a regulatory asset (Rachel Steudle testimony page 16 lines 11-14). Towards the end of  
16 2023 DTE realized they needed more funding than originally projected to get their whole  
17 system to a 5-year cycle due to various cost drivers.

18 Q. Does Staff support the Company’s tree trimming request of \$240,000,000 in 2025?

19 A. Yes, Staff supports the Company’s 2025 tree trimming request of \$109,000,000 in Base  
20 O&M, \$43,700,000 in regulatory asset that was approved in Case No. U-21297, and  
21 \$87,000,000 in incremental regulatory asset all totally \$240,000,000.

22

23

24

25 **Tree Trimming Recommendations**

26 Q. Please explain DTE’s proposal for risk-based cycle clearing after the completion of their  
27 surge program.

**DIRECT TESTIMONY OF JESSICA DUELL**

CASE NUMBER U-21534

PART II

- 1 A. Rachel Steudle states on page 28 lines 14-21 of her direct testimony,  
2  
3 As the Company enters the final years of the Surge, the Company recognizes that  
4 there are opportunities to adjust the target cycle for different parts of the system  
5 utilizing technology such as LiDAR. Adjusting cycle lengths based on tree species'  
6 growth rates, risk of outages, and cost of trimming will further improve trimming  
7 efficiencies and provide reliability benefits to customers. With the acquisition of  
8 LiDAR tree density and encroachment data combined with tree species data the  
9 Company has acquired over the course of the Surge program, DTE Electric has the  
10 necessary information to make data-driven improvements to the program.  
11
- 12 Q. Does Staff support the Company's proposal for risk-based cycle trimming after the  
13 completion of the surge program?
- 14 A. At this time, Staff would like to see the results of the third-party audit, currently being  
15 conducted by the Liberty Consulting Group, to determine what would be the best option  
16 for the Company regarding a definitive tree trimming program after the surge program is  
17 completed. The results of the audit may give Staff answers regarding any tree trimming  
18 specifications the Company may need to use and potential cycle lengths that will be  
19 beneficial for DTE's service territory.
- 20 Q. Please explain DTE's proposal regarding Staff's recommendation for more aggressive  
21 tree trimming of zones 2 and 3.
- 22 A. Rachel Steudle states on page 37 lines 9-14 of her direct testimony,  
23  
24 The Company proposes comparing circuits trimmed on our regular maintenance program  
25 (control group) to circuits trimmed for construction projects (test group). The Company  
26 has a small subset of circuits that have been trimmed to a more expansive specification,  
27 with all overhang removed, in preparation for construction projects. The Company can  
28 compare the cost and reliability of these two groups to understand the impact of  
29 potentially changing the specification.
- 30 Q. Does Staff support the Company's proposal for more aggressive tree trimming for zones  
31 2 and 3.

**DIRECT TESTIMONY OF JESSICA DUELL**

CASE NUMBER U-21534

**PART II**

1 A. Staff supports DTE's proposal to look at circuits trimmed on regular maintenance versus  
2 circuits trimmed during construction projects. Staff believes this approach will help  
3 determine whether zones 2&3 need to be trimmed more aggressively or not.  
4

**Storm Restoration Expenses**

5  
6 Storm Restoration

7 Q. Please briefly describe the Company's Storm Restoration expenses.

8 A. DTE storm restoration program entails the Company completing restoration activities  
9 after a storm occurs. Staff had difficulty finding in testimony from the Company a  
10 description stating what it is spending storm restoration expenses on and what the  
11 Company defines as storm restoration expense. Staff recommends that the Company  
12 provide a brief description in future cases of what the Company defines as storm  
13 restoration expenses and describe what the Company plans on spending their storm  
14 restoration expenses on.

15 Q. Did Staff review the Company's projected test year for service restoration O&M  
16 expense?

17 A. Yes, Staff reviewed the Company's projected test year service restoration spending of  
18 \$64,500,000 in O&M expenses. This amount can be found in Exhibit A-13 Schedule  
19 C5.6 page 2 lines 1-8.

20 Q. Does Staff support the Company's requested \$64,500,000 in service restoration for the  
21 projected test year O&M expense?

22 A. Yes, staff approves the spend of \$64,500,000 for the projected test year O&M expense  
23 for service restoration.

**DIRECT TESTIMONY OF JESSICA DUELL**

CASE NUMBER U-21534

PART II

1 Storm Restoration Cost Sharing Mechanism

2 Q. Please briefly describe the Company's Storm Restoration Cost Sharing Mechanism.

3 A. DTE is proposing a Storm Restoration Cost Sharing Mechanism that will become  
4 effective January 1, 2025. Company witness Foley explains in his direct testimony on  
5 page 23 lines 1-25, that storm restoration O&M expenses follow a five-year trailing  
6 average and are authorized for recovery from customers through base rates. At the end of  
7 each year, storm restoration expenses would be compared to what has been authorized to  
8 be recovered from customers in base rates. Any difference between storm restoration  
9 expenses for the year and those that have been authorized for recovery will be equally  
10 shared between the company and their customers. Mr. Foley explains in detail how this  
11 will work on page 23-24 lines 23-25 and 1-3 of his direct testimony.

12 If actual storm restoration O&M expenses are less than projected, the Company returns  
13 50% of the difference to customers by recording that amount as a Regulatory Liability. If  
14 actual storm restoration O&M expenses are more than projected, the Company recovers  
15 50% of the difference from customers by recording that amount as a Regulatory Asset.  
16 Regulatory Assets and/or Liabilities accumulate between general rate cases until a  
17 subsequent general rate case when any net Regulatory Liability or Regulatory Asset is  
18 addressed.

19  
20 Mr. Foley testifies that this mechanism will help the Company control costs. On page 26,  
21 lines 8-15 of his direct testimony he states the following:

22 [T]he Company is proposing the equal sharing of costs that differ from those  
23 authorized for recovery in base rates. The sharing of costs ensures that the  
24 Company has a strong incentive to control costs regardless of what actual costs  
25 are for a given year. Specifically, if actual costs are greater than projected, the  
26 Company is incentivized to control costs because it must absorb 50 cents of every  
27 incremental dollar that is spent. If actual costs are less than projected, the  
28 Company is still incentivized to control costs because it is allowed to retain 50  
29 cents of every incremental dollar that is saved.  
30

**DIRECT TESTIMONY OF JESSICA DUELL**

CASE NUMBER U-21534

**PART II**

1 Q. Does Staff support the Company's request for a Storm Restoration Cost Sharing  
2 Mechanism?

3 A. No, Staff does not support the Storm Restoration Cost Sharing Mechanism. Staff believes  
4 this mechanism should not be approved because 1) Staff is supporting the full-service  
5 restoration expense for the test year; 2) the Commission rejected similar mechanisms in  
6 prior cases U-20963, U-20697, and U-21389; and 3) Staff would like to see results from  
7 the third-party audit to further determine cost savings in storm restoration expenses. In  
8 Case No. U-21305 the Commission ordered a third-party audit be completed by a  
9 consultant who will investigate Consumers and DTE's distribution systems. After the  
10 audit is completed, the results may show cost savings for DTE and give Staff ideas on  
11 what could be beneficial to both the Company and their customers.

12 Storms are also progressively getting worse each year. Customers may never  
13 see a benefit from the proposed storm restoration mechanism due to the Company  
14 spending over the requested amounts each year.

15 Finally, the way the Company currently recovers storm restoration expenses  
16 provides a stronger incentive to control costs than the Storm Restoration Cost Sharing  
17 Mechanism. The Company currently keeps 100% of savings, rather than 50%, and  
18 absorbs 100% of costs overages, rather than 50%. The Company's proposal dulls these  
19 incentives.

20

21 **Summary**

22 Q. Please summarize your recommendations.

**DIRECT TESTIMONY OF JESSICA DUELL**

CASE NUMBER U-21534

PART II

- 1 A. 1. Staff approves the spend of \$109,000,000 in Base O&M for 2025 for tree trimming.  
2 Staff also supports \$87,000,000 in incremental regulatory asset to complete the surge  
3 program.  
4 2. Staff recommends waiting on results of Audit to determine if risk-based cycle tree  
5 trimming works for DTE Electric's service territory.  
6 3. Staff approves DTE's proposal to investigate more aggressive trimming of zones 2&3.  
7 4. Staff approves the spend of \$64,500,000 for the projected test year O&M expense in  
8 service restoration.  
9 5. Staff recommends the Storm Restoration Cost Sharing Mechanism not be approved.

10

11 Q. Does this conclude your testimony?

12 A. Yes.

13

**S T A T E O F M I C H I G A N**  
**B E F O R E T H E M I C H I G A N P U B L I C S E R V I C E C O M M I S S I O N**

\* \* \* \*

In the matter of the application of	)	
<b>DTE ELECTRIC COMPANY</b>	)	
for authority to increase its rates, amend	)	Case No. U-21534
its rate schedules and rules governing the	)	
distribution and supply of electric energy,	)	
<u>and for miscellaneous accounting authority.</u> )	)	

**Q U A L I F I C A T I O N S A N D D I R E C T T E S T I M O N Y O F**  
**A L L Y D U R F E E**  
**M I C H I G A N P U B L I C S E R V I C E C O M M I S S I O N**

July 26, 2024

**QUALIFICATIONS OF ALLY DURFEE**

CASE NUMBER U-21534

**PART I**

1 Q. Please state your full name and business address for the record.

2 A. My name is Ally Durfee, and my business address is 7109 West Saginaw  
3 Highway, Lansing, Michigan 48917.

4 Q. By whom are you employed and in what capacity?

5 A. I am employed by the Michigan Public Service Commission (MPSC or  
6 Commission) as a Public Utilities Engineer in the Electric Operations Section of  
7 the Energy Operations Division.

8 Q. Please describe your educational background.

9 A. I earned a Bachelor of Science degree in Civil Engineering from Utah State  
10 University in 2011.

11 Q. What is your professional background?

12 A. In 2013, I began working at Rocky Mountain West Telecom (RMWT), a  
13 telecommunications engineering firm in Utah, as an Engineering Assistant. I was  
14 later promoted to department manager. While working at RMWT, I gained a lot  
15 of experience working with many electric utilities to gain joint use rights on poles.  
16 I completed many projects involving upwards of 500 poles and became very  
17 familiar with the NCEES standards for pole attachments. I completed the CET  
18 Design Methods and Procedures training course in 2021. I started with the MPSC  
19 a Public Utilities Engineer in the Electric Operations section in April of 2022.  
20 My current responsibilities include reviewing reasonableness and prudence of  
21 electric rate cases and testifying on my findings.

22 Q. Have you received any work-related training since starting your employment with  
23 the MPSC?

QUALIFICATIONS OF ALLY DURFEE

CASE NUMBER U-21534

PART I

1 A. Yes. In June of 2022, I completed the Michigan Infrastructure Council Asset  
2 Management Champion Course through the Michigan Infrastructure Council. I  
3 also completed Stray Voltage Training that same month. I completed the IPU's  
4 Annual Regulatory Studies Program Fundamentals Course, the Incident  
5 Investigation, Root Cause Analysis Training and MORT Certification, and the  
6 Basics Practical Regulatory Training for the Electric Industry. I have also  
7 completed several EUCI training courses including Distribution Reliability  
8 Fundamentals, Electric Utility Pricing: Trends in Cost Recovery, Electric  
9 Distribution Safety, and Electric Distribution Planning Fundamentals. I attended  
10 the Distribution System Planning and Resilience Training by NASEO, NARUC &  
11 LBNL.

12 Q. Have you previously testified before the Commission?

13 A. Yes. I have filed testimony in the following cases:

<u>Case No.</u>	<u>Company</u>	<u>Type of case</u>	<u>Assisted with</u>
14 U-21224	Consumers Energy	Electric Rate	Service Restoration, 15 Line Clearing, and 16 CVR
17 U-21286	Upper Peninsula 18 Power Company	Electric Rate	Substation Projects
19 U-21461	Indiana Michigan 20 Power Company	Electric Rate	Distribution Capital 21 Expenditures

22 Q. Have you provided technical assistance in any other cases?

23 A. Yes, in the following case:

<u>Case No.</u>	<u>Company</u>	<u>Type of Case</u>	<u>Assisted with:</u>
24 U-21297	DTE Electric	Electric Rate	Distribution capital

**DIRECT TESTIMONY OF ALLY DURFEE**  
**CASE NUMBER U-21534**  
**PART II**

1 Q. What is the purpose of your testimony in this proceeding?

2 A. The purpose of my testimony is to present the Michigan Public Service  
3 Commission Staff's (Staff) recommendations regarding DTE Electric Company's  
4 (DTE or the Company) strategic capital programs.

5 Q. Are you sponsoring any exhibits?

6 A. No.

7 **Strategic Capital Programs**

8 Q. Did Staff review Company's proposed distribution strategic capital expenditures?

9 A. Yes, Staff reviewed the Company's proposed distribution strategic capital  
10 expenditures.

11 Q. Which categories are considered to be distribution strategic capital?

12 A. The Company categorizes distribution strategic capital into 3 categories. They are  
13 Infrastructure Resilience and Hardening, Infrastructure Redesign and  
14 modernization, and Technology and Automation.

15 **Infrastructure Resilience and Hardening**

16 Q. Briefly describe the infrastructure Resilience and Hardening category.

17 A. The Infrastructure Resilience and Hardening Pillar includes programs and projects  
18 focused on near-term grid infrastructure investments to harden the system against  
19 an increasing frequency and severity of high winds and storms, address frequent  
20 outage circuits, and replace damaged and/or defective infrastructure.

21 Q. What are the projected expenditures for the infrastructure resilience and hardening  
22 category?

**DIRECT TESTIMONY OF ALLY DURFEE**  
**CASE NUMBER U-21534**  
**PART II**

1 A. The company is projecting \$671,539,000 for the 2023 and 2024 bridge period and  
2 \$364,706,000 for the 2025 test year.

3 Q. Do you have any adjustments to this category?

4 A. At this time, no.

5 **Infrastructure Redesign and Modernization**

6 Q. Briefly describe the Infrastructure Redesign and Modernization category.

7 A. The Infrastructure Redesign and Modernization category focuses on  
8 fundamentally rebuilding and modernizing the near century old grid to support the  
9 long-term grid needs. The specific investments in this pillar are essential to  
10 meeting the evolving needs of customers, including adoption of electric vehicles  
11 (EVs) and other forms of electrification, distributed energy resources (DER), and  
12 the evolving ways in which customers are interacting with the grid.

13 Q. What are the projected expenditures for the Infrastructure Redesign and  
14 Modernization category?

15 A. The Company is projecting \$550,740,000 for the 2023 and 2024 bridge period  
16 and \$227,003,000 for the 2025 test year.

17 Q. Do you have any adjustments to this category?

18 A. At this time, no.

19 **Technology and Automation**

20 Q. Briefly describe the Technology and Automation Category.

21 A. Investments in new technologies are a fundamental part of the grid, improving the  
22 way modern electric grids operate and resulting in improved reliability,  
23 operability, and safety. They also provide new opportunities to improve

**DIRECT TESTIMONY OF ALLY DURFEE**  
**CASE NUMBER U-21534**  
**PART II**

1 operations in ways that benefit customers, such as the ability to automatically  
2 isolate outages to limit the number of impacted customers. An additional critical  
3 function is to provide real-time visibility for system operators and engineers into  
4 circuit and substation loading. This loading data is critical to managing circuits  
5 efficiently both today and in the future, and to accommodating electric vehicles  
6 and increasing numbers of DER such as solar, and energy storage.

7 Q. What are the projected expenditures for the Technology and Automation  
8 Category?

9 A. The Company is projecting \$287,524,000 for the 2023 and 2024 bridge period  
10 and \$235,571,000 for the 2025 test year.

11 Q. Do you have any adjustments to this category?

12 A. At this time, no.

13 Q. Are the results of the third-party audit of the Company, which was initiated by the  
14 Commission in Case No. U-21305, available at this time?

15 A. No. The results are not currently available but are expected to be later in 2024.

16 Q. Can the results of the audit cause spending priorities to change?

17 A. Yes, the results of the audit have the potential to change spending priorities of the  
18 Company depending on what are deemed the best investments to reach the goals  
19 of the Company regarding its electric distribution system.

20 Q. Please summarize your recommendations.

21 A. At this time staff has no recommended adjustments to the strategic capital  
22 programs.

23 Q. Does this conclude your testimony?

**DIRECT TESTIMONY OF ALLY DURFEE**  
CASE NUMBER U-21534  
PART II

1 || A. Yes.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

\* \* \* \*

In the matter of the application of )  
**DTE ELECTRIC COMPANY** )  
for authority to increase its rates, amend )  
its rate schedules and rules governing the )  
distribution and supply of electric energy, )  
and for miscellaneous accounting authority.)

Case No. U-21534

**QUALIFICATIONS AND DIRECT TESTIMONY OF**

**NICHOLAS M. EVANS**

**MICHIGAN PUBLIC SERVICE COMMISSION**

July 26, 2024

**QUALIFICATIONS OF NICHOLAS M. EVANS**

CASE NUMBER U-21534

PART I

1 Q. Please state your full name and business address for the record.

2 A. My name is Nicholas M. Evans (he/him/his), and my business address is 7109 West  
3 Saginaw Highway, Lansing, Michigan 48917.

4 Q. By whom are you employed and in what capacity?

5 A. I am employed by the Michigan Public Service Commission (MPSC or Commission) as  
6 Manager of the Electric Operations Section. This section is part of the Energy  
7 Operations Division, which is responsible for ensuring safe, reliable, and accessible  
8 energy supplies.

9 Q. Please describe your educational background.

10 A. I earned a Bachelor of Science in Electrical Engineering from Kettering University in  
11 2005. In addition, I earned a Master of Public Administration degree from Western  
12 Michigan University in 2012.

13 Q. What is your professional background?

14 A. In 2007, I began working at the State of Michigan Energy Office as a staff engineer,  
15 where I performed energy audits on local government, school district, and state office  
16 buildings and advised the building managers and other personnel on ways to conserve  
17 energy and increase their buildings' energy efficiency. I also reviewed energy audits  
18 from private contractors for these customers.

19 In April 2010, I began working for the MPSC in the Energy Efficiency Section as  
20 a Public Utilities Engineer. In this Section, I reviewed filings made in the reconciliation  
21 process of utility Energy Optimization plans. I was the case coordinator for Staff for six  
22 electric cooperatives' cases and for Case Nos. U-16013 and U-16014. In addition, I

**QUALIFICATIONS OF NICHOLAS M. EVANS**

CASE NUMBER U-21534

**PART I**

1 participated in the MPSC Energy Optimization Collaborative and the MPSC Plug-in  
2 Hybrid Electric Vehicle Task Force.

3 In 2010, I was placed into the Smart Grid Section where I reviewed the portions  
4 of utility rate case filings that pertained to Smart Grid, Advanced Metering Infrastructure  
5 (AMI) and Automated Meter Reading (AMR). I testified in several rate cases on AMI  
6 issues. I also assisted in writing the Staff Report in Case No. U-17000 and was a member  
7 of the MPSC Smart Grid Collaborative.

8 In 2013, I transferred to the Generation and Certificate of Need Section. My  
9 primary responsibility was to review expenditures related to environmental compliance  
10 and the purchase of new fossil generation in utility rate case filings. My other  
11 responsibilities were to review portions of Certificate of Necessity applications and assist  
12 with tracking and monitoring various environmental rules as they were proposed and  
13 finalized. In 2017, I led two workgroups as part of the Integrated Resource Plan  
14 Statewide Parameter Setting/Modeling stakeholder outreach process.

15 In 2017, I was promoted to a Public Utilities Engineering Specialist and began  
16 working in the Electric Operations section. My primary responsibilities were to review  
17 distribution system expenditures and expenses in utility rate case filings and co-lead the  
18 Interconnection Standards and Worker Safety workgroup, which was tasked with  
19 updating Michigan's interconnection, distributed generation, and legally enforceable  
20 obligation rules. My other responsibilities were to review distribution operations five-  
21 year plans, log safety incidents associated with utility equipment, assist with  
22 investigations, and assist with updating the Service Quality and Reliability Standards for  
23 Electric Distribution Systems rules and the Technical Standards for Electric Service rules.

**QUALIFICATIONS OF NICHOLAS M. EVANS**

CASE NUMBER U-21534

**PART I**

1           In 2020, I was promoted to Manager of the Electric Operations Section. As  
2           manager, I continue to review utility rate case filings, and I regularly assist with various  
3           Commission initiatives. I also serve as a point of contact for utilities when safety  
4           incidents associated with utility equipment occur. Since 2020, I have been participating  
5           in the MPSC’s Diversity, Equity, and Inclusion (DEI) initiative. In 2022, I began  
6           assisting with the oversight of the third-party review of the electric distribution systems  
7           of Consumers Energy and DTE Electric, required by the October 5, 2022 order in Case  
8           No. U-21305. In 2023, I began participating in the Financial Incentives and  
9           Disincentives workgroup, which was established in Case No. U-21400 and is tasked with  
10          reviewing and considering issues related to the creation of financial incentives and  
11          penalties involving outages and distribution performance.

12 Q.    Have you received any work-related training since starting your employment with the  
13          MPSC?

14 A.    Yes. I have attended the following programs hosted by the Institute of Public Utilities at  
15          Michigan State University: Forecasting for Regulators, Annual Regulatory Studies  
16          Program, Advanced Regulatory Studies Program, Michigan Forum on Economic  
17          Regulatory Policy, Introduction to Public Utility Regulation and Ratemaking, and the  
18          IPU Ratemaking Course.

19 Q.    Have you attended any other training programs or events since 2007?

20 A.    Yes. Since 2007, I have attended training programs and events on energy auditing, smart  
21          grid applications, electric generation, environmental compliance, root cause analysis,  
22          asset management, diversity, equity, incident command and management, distributed

**QUALIFICATIONS OF NICHOLAS M. EVANS**

CASE NUMBER U-21534

**PART I**

1 energy resources, and electric distribution. Programs and events focused on electric  
2 distribution include the following:

3 -Distribution Efficiency Planning and Voltage Optimization conference sponsored by  
4 EUCI, in 2012.

5  
6 -Distribution Systems and Planning, hosted by NARUC, Organization of MISO States,  
7 and Lawrence Berkley National Laboratory, in 2018.

8  
9 -Fundamentals of Overhead Distribution Systems, presented by EUCI, in April 2023.

10 -Underground Electrical Distribution Fundamentals, presented by EUCI, in April 2023.

11 -Electrical Distribution Safety, presented by EUCI, in May 2023.

12 -Electricity 101, presented by EUCI, in June 2023.

13 -PBR for Energy Utilities, presented by NARUC Regulatory Training Initiative, in  
14 October 2023.

15 Q. Have you been awarded any certificates as a result of your regulatory training?

16 A. Yes. In 2014, I was awarded a Tier One Certificate of Continuing Regulatory Education  
17 from the Institute of Public Utilities at Michigan State University. In July 2022, I  
18 completed the Michigan Infrastructure Council Asset Management Champion Program.

19 Q. Have you previously testified before the Commission?

20 A. Yes. I have filed testimony in the following cases:

<u>Case No</u>	<u>Company</u>	<u>Type of Case</u>	<u>Subject of Testimony</u>
U-16180	Indiana-Michigan	Electric rate (settled)	gridSMART <sup>sm</sup> project
U-16472	Detroit Edison	Electric rate	AMI, SmartCurrents
U-16794	Consumers Energy	Electric rate	AMI/Smart Grid
U-16999	MichCon	Gas rate (settled)	AMI and AMR
U-15768	Detroit Edison	Remand – Electric rate	AMI pilot program

**QUALIFICATIONS OF NICHOLAS M. EVANS**

CASE NUMBER U-21534

PART I

1	U-17087	Consumers Energy	Electric rate (settled)	AMI
2	U-17429	Consumers Energy	Certificate of Necessity (withdrawn)	Thetford Plant- IRP review
3				
4				
5	U-16472	DTE Electric	Remand – Electric rate	AMI (with Rebuttal)
6	U-17735	Consumers Energy	Electric rate	Environmental capital and O&M, Jackson Plant
7				
8				
9				
10	U-17990	Consumers Energy	Electric rate	Environmental capital and O&M
11				
12				
13	U-18224	Upper Michigan Energy Resources Corporation	Certificate of Necessity	RICE Units – Environmental review
14				
15				
16				
17	U-18322	Consumers Energy	Electric rate	Environmental capital and O&M
18				
19				
20	U-18370	Indiana-Michigan	Electric rate	Contingency and SCR
21	U-20162	DTE Electric	Electric rate	Distribution capital and O&M
22				
23				
24	U-20561	DTE Electric	Electric rate	Distribution capital and O&M
25				
26				
27	U-20697	Consumers Energy	Electric rate	Distribution capital and O&M
28				
29				
30	U-20963	Consumers Energy	Electric rate	Distribution capital and O&M (with Rebuttal)
31				
32				
33				
34	U-20836	DTE Electric	Electric rate	Distribution system programs, Vehicle Fleet, outage credits
35				
36				
37				
38	U-21224	Consumers Energy	Electric rate	IT project, service restoration, advanced lighting controls
39				
40				
41				
42	U-21286	Upper Peninsula Power Company	Electric rate	Overhead-to-underground projects
43				

**QUALIFICATIONS OF NICHOLAS M. EVANS**

CASE NUMBER U-21534

PART I

1				
2	U-21297	DTE Electric	Electric rate	Distribution capital,
3				undergrounding, IT projects
4				
5	U-21389	Consumers Energy	Electric rate	Distribution deferral
6				mechanism, Investment
7				Recovery Mechanism
8				
9	U-21461	Indiana-Michigan	Electric rate	IIJA grant funding, grant
10				writing costs, outage credits

11  
12 Q. Have you provided technical assistance in any other cases?

13 A. Yes, in multiple cases:

14	<u>Case No.</u>	<u>Company</u>	<u>Type of Case</u>	<u>Assisted with:</u>
15	U-17053	Detroit Edison	Tariff	Non-transmitting
16				meter provision
17				
18	U-15645	Consumers Energy	Remand – Electric rate	AMI pilot program.
19	U-18462	Northern States	Electric rate (settled)	Distribution system
20		Power		capital and O&M
21				
22	U-21045	Alpena Power	Electric rate (settled)	Distribution capital
23		Company		and O&M
24				
25	U-21097	Northern States	Electric rate (settled)	Distribution capital
26		Power		
27				
28	U-21138	Consumers Energy	Complaint (withdrawn)	Distribution system
29				operations

**DIRECT TESTIMONY OF NICHOLAS M. EVANS**

CASE NUMBER U-21534

PART II

1 Q. What is the purpose of your testimony in this proceeding?

2 A. The purpose of my testimony is to present the Michigan Public Service Commission  
3 Staff's (Staff) recommendations regarding DTE Electric Company's (DTE Electric or the  
4 Company) proposals to recover certain outage credits paid to customers and to expand  
5 the duration and scope of the Infrastructure Recovery Mechanism (IRM).

6 Q. Are you sponsoring any exhibits?

7 A. No.

8 **Outage Credits**

9 Q. What is the Company proposing regarding cost recovery of customer outage credits in the  
10 instant case?

11 A. The Company's position regarding credits paid for outages that exceed the duration limits  
12 in service quality rules R 460.744 and R 460.745 is that these credits should be  
13 recoverable from ratepayers when the outage was caused by the transmission operator,  
14 another utility, public interference, or animal interference. The Company's position  
15 regarding credits paid to customers for exceedance of the outage frequency limit in  
16 service quality rule R 460.746 is that a portion of the total credits provided to ratepayers  
17 as a whole under this rule should be recoverable, and this portion would correspond to  
18 outages caused by the transmission operator, another utility, public interference, animal  
19 interference, ice, lightning, wind, or other weather.

20 The Company proposes to recover the outage credit costs by deferring the costs  
21 related to credits eligible for recovery, starting after an order in the instant case. The  
22 deferred amounts would be reviewed for reasonableness and prudence in the next general  
23 electric rate case. Once the deferred amounts are approved by the Commission the

**DIRECT TESTIMONY OF NICHOLAS M. EVANS**

CASE NUMBER U-21534

**PART II**

1 Company begin amortizing and recovering them. This proposed recovery treatment is  
2 very similar to what the Company proposed in U-20836.

3 Q. Does Staff agree with this proposal?

4 A. Not all of it. While Staff agrees with deferring the costs related to credits eligible for  
5 recovery, Staff's position is that recovery should be far more limited than what DTE  
6 Electric has proposed.

7 For credits paid for outages that exceed the duration limit, only those outages  
8 caused by a transmission operator or another utility should be recovered from ratepayers.

9 For credits paid to customers for exceedance of the outage frequency limit, the  
10 recoverable portion of the total credit amount provided to ratepayers should correspond  
11 only to outages caused by the transmission operator, another utility, or public  
12 interference. For example, let's assume that 150,000 residential customers will receive  
13 credits for experiencing 6 sustained interruptions in 2024, consistent with the language of  
14 Rule 460.746. The total credit amount provided should be \$5,700,000, as the current bill  
15 credit at the time of this filing is \$38. (Commercial customers and industrial customers  
16 can also receive credits, but for the sake of simplicity, this example only includes  
17 residential customers. In addition, I am assuming that the bill credit amount does not get  
18 updated in September and stays at \$38 for the entire year.) Let's further assume that each  
19 customer who receives a credit experienced exactly 6 outages over the course of the year,  
20 which corresponds to 900,000 outages total for this group of customers. After some  
21 analysis in early 2025, the Company finds that 20% of those outages were caused by the  
22 transmission operator, another utility, or public interference. In this case, the Company

**DIRECT TESTIMONY OF NICHOLAS M. EVANS**

CASE NUMBER U-21534

PART II

1 should only recover from ratepayers 20% of the \$5,700,000 paid out, or \$1,140,000. The  
2 remaining 80%, or \$4,560,000, would be borne by shareholders.

3 Q. Is this methodology similar to the Company's initial proposal?

4 A. Yes, based on the testimony of Company witness Adella Crozier, who states on page 34  
5 of her direct testimony:

6 **Q47. Does the Company have a proposal for how recoverable credits related to**  
7 **frequent outages would be calculated?**

8 A47. The Company would like to spend more time with Staff to design a methodology  
9 for the recovery of these credits but has an initial proposal. If a customer meets the  
10 criteria for the outage credit based on outage frequency, there will likely be a mix of  
11 underlying causes. Though mathematically simple to determine the percentage of the  
12 outage credit that is recoverable, it will be expensive and complicated to implement an  
13 algorithm into the billing system to calculate a unique percentage to apply to each \$38  
14 credit that is being deferred for recovery. The Company proposes that a common  
15 percentage be applied to all outage credits paid for outage frequency exceedances that  
16 reflects some analytics from the previous year. In this way, a simple and consistent factor  
17 can be applied to each outage credit paid for frequency exceedances, avoiding the need  
18 for complicated and costly system programming.

19  
20 It would be less costly to analyze the prior year's data and apply a common percentage  
21 than to analyze each payment real-time and apply a unique factor. The Company would  
22 like to work with Staff to develop a methodology that is reasonable and able to be  
23 implemented without billing system complexities.  
24

25 Q. Is Staff open to collaborating with the Company and other intervenors after the  
26 conclusion of this rate case on finalizing the methodology for the recovery of repetitive  
27 outage credits, if necessary?

28 A. Yes.

29 Q. Why does Staff oppose recovery of long-duration outage credits for outages caused by  
30 public interference and animal interference?

31 A. Staff's position is that the Company recover from ratepayers only those outage credits  
32 that are paid out due to outages that are outside the control of the Company to resolve.

33 An outage caused by the transmission system operator or another utility clearly falls

**DIRECT TESTIMONY OF NICHOLAS M. EVANS**

CASE NUMBER U-21534

PART II

1 within this category. However, under Staff's position, credits paid out due to events such  
2 as a car hitting a DTE Electric-owned pole or an animal damaging equipment could not  
3 be recovered from ratepayers, because restoring customers in a timely manner after car-  
4 pole accidents or other public interference and animal interference is an expected utility  
5 function.

6 Q. Why does Staff oppose recovery of repetitive outage credits for outages caused by animal  
7 interference, ice, lightning, wind, and other weather?

8 A. Staff's position is that the Company recover from ratepayers only those outage credits  
9 that are paid out due to outages that are completely outside the control of the Company to  
10 prevent. An outage caused by the transmission system operator, another utility, or public  
11 interference clearly falls within this category. However, under Staff's position, credits  
12 paid out due to events such as an animal damaging equipment or a storm could not be  
13 recovered from ratepayers, because the utility should be hardening or otherwise  
14 upgrading its distribution system to reduce or eliminate the occurrences of these types of  
15 outages.

16 **Infrastructure Recovery Mechanism**

17 Q. Please describe DTE Electric's proposed infrastructure recovery mechanism (IRM).

18 A. In Case No. U-21297, the Company proposed IRM treatment for five distribution capital  
19 programs:

20 1) Conversions;

21 2) Subtransmission Redesign and Rebuild;

22 3) Breaker Replacement;

23 4) Underground Residential Distribution (URD) Replacement; and

**DIRECT TESTIMONY OF NICHOLAS M. EVANS**

CASE NUMBER U-21534

PART II

1 5) 4.8 kV Circuit Automation.

2 The IRM would be in place for just over three years:

3 -IRM Plan Year 1 would cover December 1, 2023 – December 31, 2024;

4 -IRM Plan Year 2 would cover January 1, 2025 - December 31, 2025; and

5 -IRM Plan Year 3 would cover January 1, 2026 – December 31, 2026.

6 The Company proposed that two stakeholder processes, the IRM Planning Process and  
7 the IRM Reconciliation Process, be part of the IRM. Company witness Neal Foley  
8 describes these processes on page 5 of his direct testimony in the instant case.

9 Q. What did the Commission approve in its December 1, 2023 order in Case No. U-21297?

10 A. The Commission approved the Company’s proposed IRM with several modifications.

11 For the purposes of my testimony, I will only list and describe the modifications that are  
12 relevant to my recommendations.

13 -The Company shall submit its annual IRM Investment Plan no later than four months  
14 prior to the start of each IRM Plan Year, and the Plan must be submitted to all  
15 intervening parties in the Company’s most recently filed general rate case.

16 -The Company shall schedule and provide a forum, no later than two months before the  
17 start of the IRM plan year, for Staff and intervening parties to ask questions or raise  
18 concerns about the plan.

19 -Only years 1 and 2 were approved. In other words, absent an extension granted by the  
20 Commission, the current IRM will expire at the end of 2025.

21 Q. Is the Company asking for the IRM to be modified in the instant case?

22 A. Yes, the Company is asking for four modifications to the current IRM in this case:

23 1. Extend the IRM through calendar years 2026 and 2027.

**DIRECT TESTIMONY OF NICHOLAS M. EVANS**

CASE NUMBER U-21534

PART II

1 2. Starting in 2026, Pole and Pole Top Maintenance and Modernization (PTMM)  
2 should be authorized for IRM treatment.

3 3. Starting in 2026, the scope of the automation program be modified from “4.8 kV  
4 Circuit Automation” to “Distribution Automation.”

5 4. Include \$434,100,000 in additional capital expenditures to the IRM for 2025.

6 This amount is spread across four programs:

7 Distribution Automation- an additional \$125.6 million;

8 PTMM - \$121 million;

9 4.8 kV Hardening - \$125 million; and

10 Frequent Outage Management (CEMI) - \$62.5 million.

11 If the Commission were to authorize, in full or in part, those capital programs and  
12 associated investment amounts for IRM treatment in 2025, the capital  
13 expenditures would have to be removed from the Company’s base rate recovery  
14 request.

15 Q. Does Staff support these proposed modifications?

16 A. Only one of them. Staff supports modifying the scope of “4.8 kV Circuit Automation” to  
17 “Distribution Automation” after the conclusion of IRM Plan Year 2.

18 Q. What proposed modifications to the IRM does Staff not support?

19 A. -Staff does not support extending the IRM through calendar years 2026 and 2027.

20 -Since Staff does not support extending the IRM through calendar year 2026 and 2027,  
21 Staff cannot support authorizing Pole and Pole Top Maintenance and Modernization  
22 (PTMM) be authorized for IRM treatment, starting in 2026.

**DIRECT TESTIMONY OF NICHOLAS M. EVANS**

CASE NUMBER U-21534

PART II

1 -For 2025, Staff does not support increasing the distribution automation investment from  
2 \$24.4 million to \$150 million for inclusion in the IRM. Also for 2025, Staff does not  
3 support adding \$121 million in PTMM investment, \$125 million in 4.8 kV hardening,  
4 and \$62.5 million in Frequent Outage Program (CEMI) investment to the IRM.

5 Q. Please explain why Staff does not support these changes.

6 A. As the Commission stated on page 289 of its December 1, 2023 order in the Company's  
7 last electric rate case, Case No. U-21297:

8 [T]he Commission finds that approval is limited to Plan Years 1 and 2. As noted on  
9 the record, there is ongoing discussion regarding PBR in Case No. U-21400 and an  
10 ongoing audit in Case No. U-21305. Therefore, the Commission finds that limiting the  
11 approval to the first two years will allow the company to move forward with the IRM  
12 without precluding the incorporation of any potential insights gained from those  
13 proceedings to better inform the potential continuation of the IRM.

14  
15 Staff does not want to have the Company locked into spending specific amounts  
16 in those IRM programs for all of 2026 and 2027, and further increase the IRM spending  
17 in 2025, when the U-21305 audit report, authored by the Liberty Consulting Group, will  
18 be finished sometime in late summer or the fall, and the Commission may issue an order  
19 in Case No. U-21400 regarding financial incentives and disincentives. The Liberty audit  
20 report may have recommendations that could cause DTE Electric to change spending  
21 amounts and programs included in the IRM. Company witness Neal Foley says as much  
22 on page 16 of his direct testimony:

23 [F]uture IRM proposals would incorporate the recommendations from the  
24 Distribution System Audit where appropriate. For example, while the Company  
25 cannot predict what those recommendations will be, it is possible that the  
26 Company may propose changes to either the programs or the investment levels  
27 authorized for IRM treatment based on Liberty Consulting Group's findings.

28  
29 Staff's position is that it is far better to have DTE Electric review the audit report  
30 later this year and next year and then make adjustments, where appropriate, to potential

**DIRECT TESTIMONY OF NICHOLAS M. EVANS**

CASE NUMBER U-21534

PART II

1 2026 IRM spending and programs, rather than risk being locked into inefficient spending  
2 for 2026.

3 Q. Please describe the Company's concerns with only approving the IRM for two years as  
4 opposed to four.

5 A. According to Company witness Neal Foley, on page 10-11 of his direct testimony:

6 Absent an extension granted in this case, the existing IRM will cease at the end of 2025  
7 and could only be re-established through a Commission order in a future case. Such  
8 stopping and restarting of the IRM and its associated processes could lead to  
9 inefficiencies and reduce the ability to improve upon the process through stakeholder  
10 feedback. Importantly, the proposed extension will ensure that the customer and  
11 stakeholder benefits realized through the IRM do not lapse.  
12

13 Q. What does Mr. Foley mean by "stopping and restarting"?

14 A. I will provide a hypothetical scenario to illustrate what Mr. Foley is referring to. Assume  
15 the Company files a rate case next year, on June 2, 2025, with an order issued the  
16 following year on April 1, 2026. As part of this order, a revised IRM, incorporating to  
17 some degree the Liberty audit findings, is authorized for the remainder of 2026. Since  
18 the IRM had expired on December 31, 2025, this reauthorization would bookend a three-  
19 month gap from January 1, 2026 – April 1, 2026 where no IRM was in effect. This is  
20 how "stopping and restarting" can happen with an IRM.

21 Q. Does Staff have any concerns with a gap occurring in the IRM?

22 A. No. Strictly from a process standpoint, a gap can be accommodated. Using the scenario  
23 described above, the Company would receive the results of the Liberty audit later in  
24 2024, incorporate findings as appropriate into the partial year 2026 and likely calendar  
25 year 2027 IRM Plans, and then include those plans and the IRM authorization requests in  
26 the rate case filed on June 2, 2025. Knowing that an order would be issued around April  
27 1, 2026, and assuming that the 2026 IRM Plan Year would start that same day, the

**DIRECT TESTIMONY OF NICHOLAS M. EVANS**

CASE NUMBER U-21534

PART II

1 Company could send the Partial Year 2026 IRM Investment Plan out to Staff and  
2 intervenors on December 1, 2025, and then schedule the forum on or before February 1,  
3 2026.

4 Again, it is better to pause the IRM for part of 2026 to allow for more efficient  
5 spending in 2026 and 2027 than to authorize in this rate case 2026 and 2027 IRM plans  
6 that may have already been rendered outdated by the Liberty audit report in U-21305 and  
7 a Commission order in U-21400 on financial incentives and disincentives.

8 Q. Please summarize your recommendations.

9 A. My recommendations are as follows:

10 1. For outage credits paid for outages that exceed the duration limit, only those  
11 outages caused by a transmission operator or other utility should be recovered from  
12 ratepayers.

13  
14 2. For outage credits paid to customers for exceedance of the outage frequency limit,  
15 the recoverable portion of the total credit amount provided to ratepayers as a whole  
16 should correspond to outages caused by the transmission operator, another utility, or  
17 public interference.

18  
19 3. Staff does not support extending the IRM through calendar years 2026 and 2027.

20  
21 4. For 2025, Staff does not support increasing the distribution automation  
22 investment from \$24.4 million to \$150 million for inclusion in the IRM. Also for 2025,  
23 Staff does not support adding \$121 million in PTMM investment, \$125 million in 4.8 kV  
24 hardening, and \$62.5 million in Frequent Outage Program (CEMI) investment to the  
25 IRM.

26  
27 Q. Does this conclude your direct testimony?

28 A. Yes.

**S T A T E O F M I C H I G A N**  
**BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

\* \* \* \*

**In the matter of the Application of )  
DTE ELECTRIC COMPANY )  
for authority to increase its rates, amend )  
its rate schedules and rules governing the )  
distribution and supply of electric energy, and )  
for miscellaneous accounting authority. )**

**Case No. U-21534**

**QUALIFICATIONS AND DIRECT TESTIMONY OF**

**LISA M. KINDSCHY**

**MICHIGAN PUBLIC SERVICE COMMISSION**

**July 26, 2024**

**QUALIFICATIONS OF LISA M. KINDSCHY**  
**CASE NUMBER U-21534**  
**PART I**

1 Q. Please state your name and business address.

2 A. My name is Lisa M. Kindschy. My business address is 7109 W. Saginaw  
3 Highway, Lansing, Michigan 48917.

4 Q. Where are you currently employed and in what position?

5 A. I am employed by the Michigan Public Service Commission (MPSC or  
6 Commission) as a Public Utilities Engineering Specialist in the Energy Cost  
7 Recovery & Generation Operations section within the Energy Operations  
8 Division.

9 Q. What are your responsibilities in your current position?

10 A. I perform technical analyses in Act 304 electric plan and reconciliation  
11 proceedings. In these cases, I evaluate and review power supply cost recovery  
12 (PSCR) plans and reconciliations and develop MSPC Staff's (Staff) position as  
13 appropriate. In addition, I review production-related operation and maintenance  
14 expenses and capital expenditures as well as PSCR-related costs in rate case  
15 proceedings. I am also involved in prevailing nuclear engineering matters. I  
16 currently serve as the Commission's representative on the National Association of  
17 Regulatory Utility Commissioners (NARUC) Staff Subcommittee on Nuclear  
18 Issues – Waste Disposal, and I participate in the Nuclear Waste Strategy Coalition  
19 bi-weekly conference calls.

20 Q. Please discuss your experience with the MPSC.

21 A. I began working at the MPSC in 2005 on gas cost recovery (GCR) plan and  
22 reconciliation cases. In this capacity, I was responsible for performing Staff's  
23 analysis and presenting Staff's position. In the fall of 2007, I began working as

**QUALIFICATIONS OF LISA M. KINDSCHY**  
**CASE NUMBER U-21534**  
**PART I**

1 the executive assistant to MPSC Chairman Orjiakor Isiogu. In the fall of 2008, I  
2 returned to the Act 304 and Sales Forecasting section (renamed to the Energy  
3 Cost Recovery & Generation Operations section) to work on PSCR plans and  
4 reconciliations as described above in my current position.

5 Q. Please describe your educational background.

6 A. I earned a Bachelor of Science degree in 2002 and a Master of Science degree in  
7 2005, both in Biosystems Engineering from Michigan State University.

8 Q. Have you attended any training courses or participated in any professional  
9 seminars while employed at the MPSC?

10 A. Yes. In August 2006, I attended the two-week NARUC Annual Regulatory  
11 Studies Program held at Michigan State University by the Institute of Public  
12 Utilities (IPU). I attended a seminar sponsored by New Energy titled “How to  
13 Manage Your Gas Supply Portfolio in an Uncertain Gas Market” in April 2006  
14 and two courses by Electric Utility Consultants, Inc. titled “Nuclear Power  
15 Fundamentals” in July 2010 and “Nuclear Power Operations and Regulations” in  
16 December 2013. I have attended numerous advanced regulatory sessions hosted  
17 by IPU as well as two courses – the Power Grid course in 2017 and the  
18 Accounting and Ratemaking course in 2019.

19 Q. Do you hold any licenses?

20 A. Yes. I am a registered Professional Engineer in the State of Michigan and have  
21 been since September 2012.

22 Q. Have you previously presented testimony before the MPSC?

23 A. Yes. I have presented testimony in the following cases:

**QUALIFICATIONS OF LISA M. KINDSCHY**  
**CASE NUMBER U-21534**  
**PART I**

	<u>Case No.</u>	<u>Company</u>	<u>Description</u>
1			
2	U-14547	Consumers Energy Company	Gas Rate Case
3	U-14715	Michigan Gas Utilities Corporation	GCR Plan
4	U-14718	SEMCO Energy Gas Company	GCR Plan
5	U-14401-R	Michigan Consolidated Gas Company	GCR Reconciliation
6	U-16180	Indiana Michigan Power Company	Rate Case
7	U-16801	Indiana Michigan Power Company	Rate Case
8	U-17026	Indiana Michigan Power Company	Certificate of
9			Necessity
10	U-16892-R	DTE Electric Company	PSCR Reconciliation
11	U-17767	DTE Electric Company	Rate Case
12	U-18370	Indiana Michigan Power Company	Rate Case
13	U-18404	Indiana Michigan Power Company	PSCR Plan
14	U-20350	Upper Peninsula Power Company	IRP
15	U-20223	Indiana Michigan Power Company	PSCR Plan
16	U-20359	Indiana Michigan Power Company	Rate Case
17	U-20529	Indiana Michigan Power Company	PSCR Plan
18	U-20224	Indiana Michigan Power Company	PSCR Reconciliation
19	U-20826	DTE Electric Company	PSCR Plan
20	U-20530	Indiana Michigan Power Company	PSCR Reconciliation
21	U-20836	DTE Electric Company	Rate Case
22	U-21050	DTE Electric Company	PSCR Plan
23	U-20827	DTE Electric Company	PSCR Reconciliation

**QUALIFICATIONS OF LISA M. KINDSCHY  
CASE NUMBER U-21534  
PART I**

1	U-21259	DTE Electric Company	PSCR Plan
2	U-21297	DTE Electric Company	Rate Case
3	U-21051	DTE Electric Company	PSCR Reconciliation
4	U-21425	DTE Electric Company	PSCR Plan
5			

**DIRECT TESTIMONY OF LISA M. KINDSCHY**  
**CASE NUMBER U-21534**  
**PART II**

1 Q. What is the purpose of your testimony?

2 A. The purpose of my testimony is to present Staff's adjustments to DTE Electric  
3 Company's (DTE Electric or the Company) Steam Power Generation, MERC &  
4 Fuel Supply, Nuclear Generation, and Other Power Generation capital  
5 expenditures and operations and maintenance (O&M) expenses.

6 Q. Are you sponsoring any exhibits?

7 A. Yes. I am sponsoring the following exhibits:

- 8 ● S-16.0: Actual capital expenditures through April 2024 for Non-Routine  
9 Steam Generation additions from discovery response STDE-2.1a and STDE-2.1b
- 10 ● S-16.1: Calculation of the reduction for the Monroe Bottom Ash Conversion  
11 project and updated project sheets from discovery response STDE-2.1d
- 12 ● S-16.2: Actual capital expenditures through April 2024 for Routine  
13 Maintenance over \$1 million from discovery response STDE-2.1a and STDE-2.1b
- 14 ● S-16.3: AACE Cost Estimate Classification System: Cost Estimating and  
15 Budgeting
- 16 ● S-16.4: Reductions for PAT0 and PAT1 Routine Maintenance capital projects  
17 over \$1 million in 2024 and 2025
- 18 ● S-16.5: Actual capital expenditures through April 2024 for MERC & Fuel  
19 Supply from discovery response STDE-2.21a and STDE-2.21b
- 20 ● S-16.6: Actual capital expenditures through April 2024 for Nuclear Generation  
21 from STDE-2.15a and STDE-2.15b and Reductions for Nuclear capital projects in  
22 2024 and 2025

**DIRECT TESTIMONY OF LISA M. KINDSCHY**  
**CASE NUMBER U-21534**  
**PART II**

- 1           • S-16.7: Updated O&M Exhibits for Steam, MERC & Fuel Supply, Nuclear  
2 and Other Power Generation using a 2023 Historic Year

3           **Steam, MERC & Fuel Supply, Nuclear, and Other Power Generation Capital**

4           **Expenditures**

5 Q.       Please describe Staff's adjustments to Steam Power Generation capital  
6 expenditures.

7 A.       Staff is recommending two adjustments to the Company's Non-Routine Steam  
8 Power Generation capital expenditures and two adjustments to the Company's  
9 Routine Maintenance projects greater than \$1 million.

10 Q.       Please describe Staff's first adjustment to the additions for Non-Routine Steam  
11 Power Generation capital expenditures on Exhibit A-12 Schedule B5.1 page 2.

12 A.       Staff's first adjustment is to update the capital expenditures for Non-Routine  
13 Steam Generation with actual amounts incurred through April 2024 on Exhibit A-  
14 12 Schedule B5.1 page 2 on lines 1-18. Please note that the remainder of the lines  
15 on this exhibit were reviewed by other Staff. The Company's case as filed  
16 included actual amounts through October 2023. Updating the additions to Non-  
17 Routine Steam Power Generation results in a decrease of (\$579,559) for 2023 and  
18 a decrease of (\$3,130,502) for 2024 for a total reduction to the bridge period of  
19 (\$3,710,061). Please see Exhibit S-16.0 for the calculation of these adjustments  
20 for 2023 and 2024.

21 Q.       Please describe Staff's second adjustment to the additions for Non-Routine Steam  
22 Power Generation capital expenditures on Exhibit A-12 Schedule B5.1 page 2.

**DIRECT TESTIMONY OF LISA M. KINDSCHY**  
**CASE NUMBER U-21534**  
**PART II**

1 A. Staff's second adjustment to Non-Routine Steam Power Generation capital  
2 expenditures involves an update to the costs for the Monroe Bottom Ash  
3 Conversion project on line 5. In response to discovery, Staff received updated  
4 project sheets that show reduced capital expenditures for the Monroe Bottom Ash  
5 Conversion project. Specifically, the amounts approved by upper management  
6 without contingency in the updated project sheets show a reduction to capital  
7 expenditures in 2025 of (\$1,909,812) for the Monroe Bottom Ash Conversion  
8 project compared to what the Company included in its case as filed. Therefore,  
9 Staff recommends that the capital expenditures for the Monroe Bottom Ash  
10 Conversion project be reduced in the test year by (\$1,909,812) to match the  
11 Company's updated projections for spending on this project. Please see Exhibit  
12 S-16.1 for the calculation of the adjustment to the Monroe Bottom Ash  
13 Conversion project and the updated project sheets.

14 Q. Please describe Staff's first adjustment to the Company's Routine Maintenance  
15 capital projects over \$1 million on Exhibit A-12 Schedule B5.1 pages 4-8.

16 A. Staff's first adjustment to the Company's Routine Maintenance capital projects  
17 greater than \$1 million is to update the capital expenditures with actual amounts  
18 incurred through April 2024 since the Company's case as filed included actual  
19 amounts through October 2023. The Routine Maintenance capital projects greater  
20 than \$1 million that were updated are found on Exhibit A-12 Schedule B5.1 on  
21 pages 5-6. Updating Routine Maintenance capital projects greater than \$1 million  
22 results in an increase of \$1,224,761 in 2023 and a decrease of (\$22,558,252) in

**DIRECT TESTIMONY OF LISA M. KINDSCHY**  
**CASE NUMBER U-21534**  
**PART II**

1 2024 for a total reduction to the bridge period of (\$21,333,492). Please see  
2 Exhibit S-16.2 for the calculation of this adjustment.

3 Q. Please describe Staff's second adjustment to the Company's Routine Maintenance  
4 capital projects over \$1 million on Exhibit A-12 Schedule B5.1 pages 4-8.

5 A. Staff's second adjustment to the Company's Routine Maintenance capital projects  
6 greater than \$1 million is to reduce the estimated costs for certain projects for  
7 May-December 2024 by 15% and to reduce certain project estimates by 20% in  
8 2025. In response to discovery, DTE Electric stated that it does not classify its  
9 Steam, Hydro or Other Power Generation capital expenditures into the Class Cost  
10 Levels specified by the Association for the Advancement of Cost Engineering  
11 (AACE). Instead, the Company uses three internal levels to describe the stage of  
12 a project: 1) PAT0 is used to accept a new capital project into the process, 2)  
13 PAT1 is where detailed engineering and procurement of long lead materials is  
14 undertaken, and 3) PAT2 is where construction of the project is completed. For  
15 routine capital projects greater than \$1 million, Staff made an adjustment to all  
16 projects that were at the PAT0 and PAT1 stage as Staff typically has made  
17 adjustments for projects that are not in their final stages and where the  
18 engineering is not complete as the estimates for these projects are less certain.  
19 The stage of each project was found in the project sheets included with the  
20 Company's workpapers. For the projections for May-December 2024, Staff used  
21 the AACE Class 4 expected accuracy reduction range since these estimates are  
22 not as far into the future and reduced these estimates by 15%. For all of 2025,  
23 Staff used the AACE Class 5 expected accuracy reduction range and reduced

**DIRECT TESTIMONY OF LISA M. KINDSCHY**  
**CASE NUMBER U-21534**  
**PART II**

1 these estimates by 20%. Staff determined it was reasonable to reduce the 2025  
2 cost estimates more than 2024 since most of the projects in 2025 are at the PAT0  
3 stage of development and the projections are also farther into the future.

4 Furthermore, Staff concluded that reductions to the cost estimates in the bridge  
5 and test period are reasonable given that the monthly actual amounts Staff  
6 received compared to the projections included in the Company's original filing  
7 are lower for January to April 2024. (See Exhibit S-16.2 page 4.) For these  
8 reasons, Staff recommends a reduction of 15% for May-December 2024 of  
9 (\$10,648,865) and a reduction of 20% in 2025 of (\$28,451,121) for all PAT0 and  
10 PAT1 Routine Maintenance capital projects greater than \$1 million on Exhibit A-  
11 12 Schedule B5.1 pages 6-7. Please see Exhibit S-16.4 for the calculation of the  
12 adjustments in 2024 and 2025 for Routine Maintenance capital projects greater  
13 than \$1 million.

14 Q. Please explain Staff's adjustment to MERC & Fuel Supply capital expenditures.

15 A. Staff is recommending one adjustment to the Company's MERC & Fuel Supply  
16 capital expenditures on Exhibit A-12 Schedule B5.2. Staff's one adjustment is to  
17 update the months for which actual amounts are now known through April 2024.  
18 Updating MERC & Fuel Supply capital expenditures with actual amounts through  
19 April 2024 results in a decrease of (\$130,514) for 2023 and an increase of  
20 \$28,000 for 2024 for a total reduction to the bridge period of (\$102,514). Please  
21 see Exhibit S-16.5 for the calculation of this adjustment.

22 Q. Please explain Staff's adjustments to Nuclear Generation capital expenditures.

**DIRECT TESTIMONY OF LISA M. KINDSCHY**  
**CASE NUMBER U-21534**  
**PART II**

1 A. Staff is recommending two adjustments to the Company’s capital expenditures for  
2 Nuclear Generation Routine and Small Projects and two adjustments to the  
3 Company’s capital expenditures for Nuclear Generation Non-Routine and Large  
4 Projects.

5 Q. Please explain Staff’s first adjustment to Nuclear Generation Routine and Small  
6 projects capital expenditures on Exhibit A-12 Schedule B5.3 pages 2-3.

7 A. Staff’s first adjustment is to update the capital expenditures on Exhibit A-12  
8 Schedule B5.3 pages 2-3 for Nuclear Routine and Small Projects with actual  
9 amounts incurred through April 2024. Updating the Company’s exhibit with  
10 actual amounts through April 2024 for Nuclear Routine and Small Projects results  
11 in a decrease of (\$1,442,207) for 2023 and a decrease of (\$6,428,078) for 2024 for  
12 a total decrease in the bridge period of (\$7,870,285). Please see Exhibit S-16.6  
13 page 1 for the calculation of this adjustment.

14 Q. Please explain Staff’s second adjustment to the capital expenditures for Nuclear  
15 Generation Routine and Small projects on Exhibit A-12 Schedule B5.3 pages 2-3.

16 A. Staff’s second adjustment to Nuclear Generation Routine and Small projects  
17 capital expenditures is to reduce the Company’s projected nuclear capital  
18 expenditures for May-December 2024 by 15% and all capital expenditures in  
19 2025 by 20%. Similar to Steam capital expenditures, Staff requested in discovery  
20 what stage of planning each nuclear capital project was in. The Company’s  
21 response did not provide any indication of what stage of planning each project is  
22 in or how complete each nuclear project is; therefore, Staff adjusted all nuclear  
23 capital projects. Staff used the same approach as previously discussed for Steam

**DIRECT TESTIMONY OF LISA M. KINDSCHY**  
**CASE NUMBER U-21534**  
**PART II**

1 capital expenditures based on the guidance in the AACE class cost estimate  
2 accuracy range for class 4 and 5 estimates and reduced projects in May-December  
3 2024 by 15% and all projects in 2025 by 20%. Staff's recommended reductions  
4 to 2024 and 2025 are further supported by the comparison of the actual capital  
5 expenditures through April 2024 to what the Company included in its case.

6 Nuclear Routine and Small capital expenditures for December 2023 to April 2024  
7 in total were 14.3% lower than the projections included in the Company's original  
8 case. Therefore, Staff determined it is reasonable to reduce the remainder of 2024  
9 by 15%, and to reduce the 2025 test year by 20% since those estimates are farther  
10 into the future with less certainty. This adjustment is also consistent with Staff's  
11 approach to Steam Generation capital expenditures. For the reasons described  
12 above, Staff recommends a reduction of 15% for May-December 2024 of  
13 (\$3,737,313) and a reduction of 20% for 2025 of (\$8,490,015) for Nuclear  
14 Generation Routine and Small projects capital expenditures on Exhibit A-12  
15 Schedule B5.3 pages 2-3. Please see Exhibit S-16.6 page 1 for the calculation of  
16 these adjustments.

17 Q. Please explain Staff's first adjustment to the capital expenditures for Nuclear  
18 Generation Non-Routine and Large projects on Exhibit A-12 Schedule B5.3 page  
19 4.

20 A. Staff's first adjustment is to update the capital expenditures for Nuclear Non-  
21 Routine and Large Projects with actual amounts incurred through April 2024 on  
22 Exhibit A-12 Schedule B5.3 page 4. Updating the Company's exhibit with actual  
23 amounts through April 2024 for Nuclear Non-Routine and Large Projects results

**DIRECT TESTIMONY OF LISA M. KINDSCHY**  
**CASE NUMBER U-21534**  
**PART II**

1 in a decrease of (\$371,147) in 2023 and a decrease of (\$7,502,363) in 2024 for a  
2 total decrease in the bridge period of (\$7,873,510). Please see Exhibit S-16.6  
3 page 2 for the calculation of this adjustment.

4 Q. Please explain Staff's second adjustment to the capital expenditures for Nuclear  
5 Generation Non-Routine and Large projects on Exhibit A-12 Schedule B5.3 page  
6 4.

7 A. Similar to the capital expenditures for Nuclear Routine and Small projects, Staff's  
8 second adjustment is to reduce the Nuclear Generation Non-Routine and Large  
9 projects capital expenditures for May-December 2024 by 15% and all capital  
10 expenditures in 2025 by 20%. As previously discussed, Staff used the same  
11 approach for Steam capital expenditures based on the guidance in the AACE class  
12 cost estimate accuracy range for class 4 and 5 estimates. Staff's recommended  
13 reductions to 2024 and 2025 are further supported by the comparison of actual  
14 capital expenditures through April 2024 to what the Company included in its case.  
15 The capital expenditures for Nuclear Non-Routine and Large projects for  
16 December 2023 to April 2024 in total were 12.9% lower than the projections  
17 included in the Company's original case. Therefore, Staff concluded it is  
18 reasonable to reduce the remainder of 2024 by 15%, and to reduce the 2025 test  
19 year by 20% since those estimates are further into the future with less certainty.  
20 As previously noted, this adjustment is also consistent with Staff's approach to  
21 Steam Generation capital expenditures. For all the reasons discussed earlier, Staff  
22 recommends a reduction of 15% for May-December 2024 of (\$9,895,210) and a  
23 reduction of 20% for 2025 of (\$7,683,968) to the Company's capital expenditures

**DIRECT TESTIMONY OF LISA M. KINDSCHY**  
**CASE NUMBER U-21534**  
**PART II**

1 for Nuclear Generation Non-Routine and Large projects on Exhibit A-12  
2 Schedule B5.3 pages 4. Please see Exhibit S-16.6 page 2 for the calculation of  
3 these adjustments.

4 **Steam, MERC & Fuel Supply, Nuclear, and Other Power Generation O&M**  
5 **Expenses**

6 Q. Please provide an overview of Staff's recommended adjustments to the  
7 Company's Generation-related O&M expenses.

8 A. Staff is recommending an adjustment to each of the following categories of O&M  
9 expenses: Steam Power Generation, MERC & Fuel Supply, Nuclear Generation,  
10 and Other Power Generation. Specifically, Staff is recommending that the  
11 Company's Steam Power Generation, MERC & Fuel Supply, Nuclear Generation,  
12 and Other Power Generation O&M expenses be calculated using a 2023 adjusted  
13 historical test year instead of the 2022 adjusted historical test year that the  
14 Company used in its case as filed. These expenses are presented on the  
15 Company's Exhibit A-13 Schedules C5.1, 5.2, 5.3, and 5.5.

16 Q. Why is Staff recommending that DTE Electric's O&M expenses for Steam Power  
17 Generation, MERC & Fuel Supply, Nuclear Generation, and Other Power  
18 Generation be calculated beginning with a 2023 adjusted historical test year?

19 A. There are several reasons Staff determined that using an adjusted historical 2023  
20 test year as the starting point for determining these categories of O&M expenses  
21 was more reasonable than beginning with 2022. First, DTE Electric experienced  
22 several major changes to its generation fleet in 2022. In particular, the Company  
23 retired its St. Clair and Trenton Channel power plants as well as adding the Blue

**DIRECT TESTIMONY OF LISA M. KINDSCHY**  
**CASE NUMBER U-21534**  
**PART II**

1 Water Energy Center, both occurring midway through 2022. By beginning with  
2 actual 2023 expenses, adjustments for these generation fleet changes are not  
3 necessary as 2023 captures both changes for the entire 12 months without the  
4 need for adjustment. The second reason Staff determined that 2023 is a more  
5 reasonable historical year is that 2023 O&M expenses include the actual inflation  
6 experienced in 2023 without the need to be adjusted as is the case when beginning  
7 with 2022. Staff requested in discovery that the Company update its Steam Power  
8 Generation, MERC & Fuel Handling, and Nuclear Generation O&M expenses  
9 using an adjusted 2023 historical test year to arrive at an adjusted 2025 projected  
10 test year. Other Power Generation O&M expenses were provided in a response to  
11 an intervenor's discovery in ABDE-1.6 Supplemental. DTE Electric's updated  
12 O&M exhibits can be found in Exhibit S-16.7. Beginning with an adjusted 2023  
13 historical test year results in a reduction of (\$19,392,393) to Steam Generation  
14 O&M, a reduction of (\$463,140) to MERC & Fuel Supply O&M, a reduction of  
15 (\$370,897) to Nuclear Generation O&M, and a reduction of (\$3,008,921) to Other  
16 Power Generation O&M.

17 **Conclusion**

18 Q. Please summarize Staff's recommended adjustments to capital expenditures for  
19 Steam Power Generation, MERC & Fuel Supply, Nuclear Generation, and Other  
20 Power Generation that you are supporting.

21 A. Staff recommends the following adjustments to the Company's capital  
22 expenditures for Steam Power Generation, MERC & Fuel Supply, Nuclear  
23 Generation, and Other Power Generation:

**DIRECT TESTIMONY OF LISA M. KINDSCHY**  
**CASE NUMBER U-21534**  
**PART II**

1           ● A reduction of (\$579,559) in 2023 and a reduction of (\$3,130,502) in 2024 to  
2 update the capital expenditures with actual amounts through April 2024 for Steam  
3 Power Generation Non-Routine on Exhibit A-12 Schedule B5.1 page 2.

4           ● A reduction of (\$1,909,812) in 2025 to update the capital expenditures for the  
5 Monroe Bottom Ash Conversion project with amounts from the revised project  
6 sheets on Exhibit A-12 Schedule B5.1 page 2 line 5.

7           ● An increase of \$1,224,761 in 2023 and a reduction of (\$22,558,252) in 2024  
8 to update the capital expenditures with actual amounts through April 2024 for  
9 Routine Maintenance capital projects over \$1 million on Exhibit A-12 Schedule  
10 B5.1 pages 5-6.

11          ● A 15% reduction for May-December 2024 of (\$10,648,865) and a 20%  
12 reduction for 2025 of (\$28,451,121) to adjust down the projected capital  
13 expenditures for PAT0 and PAT1 Routine Maintenance capital projects over \$1  
14 million on Exhibit A-12 Schedule B5.1 pages 6-7.

15          ● A reduction of (\$130,514) in 2023 and an increase of \$28,000 in 2024 to  
16 update the capital expenditures with actual amounts through April 2024 for  
17 MERC & Fuel Supply on Exhibit A-12 Schedule B5.2 page 1.

18          ● A reduction of (\$1,442,207) in 2023 and a reduction of (\$6,428,078) in 2024  
19 to update the capital expenditures with actual amounts through April 2024 for  
20 Nuclear Routine and Small Projects on Exhibit A-12 Schedule B5.3 pages 2-3.

21          ● A 15% reduction for May-December 2024 of (\$3,737,313) and a 20%  
22 reduction for 2025 of (\$8,490,015) to adjust down the projected capital

**DIRECT TESTIMONY OF LISA M. KINDSCHY**  
**CASE NUMBER U-21534**  
**PART II**

1 expenditures for all Nuclear Routine and Small Projects on Exhibit A-12

2 Schedule B5.3 pages 2-3.

3 • A reduction of (\$371,147) in 2023 and a reduction of (\$7,502,363) in 2024 to  
4 update with actual amounts through April 2024 for Nuclear Non-Routine and  
5 Large Projects on Exhibit A-12 Schedule B5.3 page 4.

6 • A 15% reduction for May-December 2024 of (\$9,895,210) and a 20%  
7 reduction for 2025 of (\$7,683,968) to adjust down the projected capital  
8 expenditures for Nuclear Non-Routine and Large Projects on Exhibit A-12  
9 Schedule B5.3 page 4.

10 Q. Please summarize Staff's recommended adjustments to O&M expenses for Steam  
11 Power Generation, MERC & Fuel Supply, Nuclear Generation, and Other Power  
12 Generation that you are supporting.

13 A. Staff recommends the following adjustments to the Company's O&M expenses  
14 for Steam Power Generation, MERC & Fuel Supply, Nuclear Generation, and  
15 Other Power Generation:

16 • A reduction of (\$19,392,393) to Steam Generation O&M expenses on Exhibit  
17 A-13 Schedule C5.1 for the 2025 test year when starting with a 2023 adjusted  
18 historical test year.

19 • A reduction of (\$463,140) to MERC & Fuel Supply O&M expenses on  
20 Exhibit A-13 Schedule C5.2 for the 2025 test year when starting with a 2023  
21 adjusted historical test year.

**DIRECT TESTIMONY OF LISA M. KINDSCHY  
CASE NUMBER U-21534  
PART II**

1           • A reduction of (\$370,897) for Nuclear Generation O&M expenses on Exhibit  
2           A-13 Schedule C5.3 for the 2025 test year when starting with a 2023 adjusted  
3           historical test year.

4           • A reduction of (\$3,008,921) for Other Power Generation O&M expenses on  
5           Exhibit A-13 Schedule C5.5 for the 2025 test year when starting with a 2023  
6           adjusted historical test year.

7    Q.     Does that complete your testimony?

8    A.     Yes, it does.

**S T A T E O F M I C H I G A N**  
**B E F O R E T H E M I C H I G A N P U B L I C S E R V I C E C O M M I S S I O N**

\* \* \* \*

In the matter of the application of	)	
<b>DTE ELECTRIC COMPANY</b>	)	
for authority to increase its rates, amend	)	Case No. U-21534
its rate schedules and rules governing the	)	
distribution and supply of electric energy,	)	
<u>and for miscellaneous accounting authority.</u> )	)	

**Q U A L I F I C A T I O N S A N D D I R E C T T E S T I M O N Y O F**  
**C O D Y S . M A T T H E W S**  
**M I C H I G A N P U B L I C S E R V I C E C O M M I S S I O N**

**July 26, 2024**

**QUALIFICATIONS OF CODY S. MATTHEWS**  
**CASE NUMBER U-21534**  
**PART I**

1 Q. Please state your name and business address.

2 A. My name is Cody S. Matthews. My business address is 7109 W. Saginaw Hwy.,  
3 Lansing, Michigan 48917.

4 Q. By whom are you employed and in what capacity?

5 A. I am employed by the Michigan Public Service Commission (MPSC or  
6 Commission) as a Public Utilities Engineer Specialist in the Interconnection and  
7 Distributed Energy Resources Section of the Energy Operations Division.

8 Q. Please describe your educational background.

9 A. I earned a Bachelor of Science degree in Engineering from Michigan State  
10 University in 2014.

11 Q. Would you please describe your professional background.

12 A. In 2014 I began working for the MPSC in the Smart Grid Section. I reviewed  
13 sections of utility rate case filings that pertained to smart grid, advanced metering  
14 infrastructure (AMI), demand response (DR), information technology (IT), and  
15 cyber security. In 2019 I transferred into the Renewable Energy Section, which  
16 was renamed the Interconnection and DER section as of August 2022, and am  
17 focusing on electric provider's Renewable Energy (RE) Plan and reconciliation  
18 filings, electric utility interconnection, integrated resource plan (IRP) filings,  
19 energy storage, and activities related to the Public Utility Regulatory Policies Act  
20 (PURPA) of 1978.

21 Q. Have you received any work-related training since starting your employment with  
22 the MPSC?

**QUALIFICATIONS OF CODY S. MATTHEWS**  
**CASE NUMBER U-21534**  
**PART I**

1 A. Yes. I have attended several programs hosted by the Institute of Public Utilities at  
2 Michigan State University, including Introduction to Public Utility Regulation,  
3 the full two-week fundamental and intermediate course, and the Advanced  
4 Regulatory Studies Program, as well as the Michigan Forum on Economic  
5 Regulatory Policy and the Rate Making Course. Additionally, I have participated  
6 in several conferences both in person and online concerning cyber security, IEEE  
7 1547, and other renewable energy related topics.

8 Q. Have you previously testified before the Commission?

9 A. Yes, I have testified in the following cases:

<u>Case Number</u>	<u>Company</u>	<u>Case Type/Subject</u>
11 U-17767	DTE Electric Company	Rate Case
12 U-17999	Consumers Gas Company	Rate Case
13 U-18014	DTE Electric Company	Rate Case
14 U-18255	DTE Electric Company	Rate Case
15 U-18370	Indiana Michigan Power Co.	Rate Case
16 U-18999	DTE Gas Company	Rate Case
17 U-20137	Indiana Michigan Power Co.	Opt-Out Tariff
18 U-20162	DTE Electric Company	Rate Case
19 U-20165	Consumers Energy Company	IRP
20 U-15800	Commission's Own Motion	2019 Transfer Price
21 U-18091	DTE Electric Company	Avoided Cost Update
22 U-20350	Upper Peninsula Power Co.	IRP
23 U-20471	DTE Electric Company	IRP

**QUALIFICATIONS OF CODY S. MATTHEWS**  
**CASE NUMBER U-21534**  
**PART I**

1	U-20485	Indiana Michigan Power Co.	RE Recon
2	U-20591	Indiana Michigan Power Co.	IRP
3	U-15800	Commission's Own Motion	2020 Transfer Price
4	U-20561	DTE Electric Company	Rate Case
5	U-18232	DTE Electric Company	RE Plan
6	U-20697	Consumers Energy Company	Rate Case
7	U-20713	DTE Electric Company	VGP
8	U-15800	Commission's Own Motion	2021 Transfer Price
9	U-20851	DTE Electric Company	RE Plan
10	U-20963	Consumers Energy Company	Rate Case
11	U-21090	Consumers Energy Company	IRP
12	U-21009	Consumers Energy Company	RE Plan
13	U-21081	UMERC	IRP
14	U-21010	DTE Electric Company	RE Recon
15	U-21148	Consumers Energy Company	Rate Case
16	U-15800	Commission's Own Motion	2022 Transfer Price
17	U-21189	Indiana Michigan Power Co.	IRP
18	U-20836	DTE Electric Company	Rate Case
19	U-21224	Consumers Energy Company	Rate Case
20	U-21286	Upper Peninsula Power Co.	Rate Case
21	U-20803	Consumers Energy Company	PSCR Recon
22	U-21198	DTE Electric Company	RE Recon
23	U-21197	Consumers Energy Company	RE Recon

**QUALIFICATIONS OF CODY S. MATTHEWS**  
**CASE NUMBER U-21534**  
**PART I**

1	U-21193	DTE Electric Company	IRP
2	U-21172	DTE Electric Company	VGP
3	U-21297	DTE Electric Company	Rate Case
4	U-15800	Commission's Own Motion	2023 Transfer Price
5	U-21389	Consumers Energy Company	Rate Case
6	U-21410	Consumers Energy Company	DR Recon
7	U-21374	Consumers Energy Company	VGP
8	U-21353	DTE Electric Company	RE Recon
9	U-21352	Consumers Energy Company	RE Recon
10	U-18091	DTE Electric Company	Avoided Cost Update
11	U-15800	Commission's Own Motion	2024 Transfer Price
12	U-21555	Upper Michigan Power Co.	Rate Case

**QUALIFICATIONS OF CODY S. MATTHEWS**  
**CASE NUMBER U-21534**  
**PART II**

1 Q. What is the purpose of your testimony?

2 A. The purpose of my testimony is to present the MPSC Staff's (Staff)  
3 recommendations for DTE Electric Company's (DTE or the Company) proposed  
4 commercial and industrial (C&I) battery demand response pilot, the distributed  
5 generation program, and the proposed non-wires alternative (NWA) pilots.

6 Q. Are you sponsoring any exhibits in this proceeding?

7 A. Yes, I am sponsoring the following exhibits:

8 Exhibit S-8.0, Discovery Response STDE-3.11h

9 Exhibit S-8.1, Discovery Response STDE-3.11g

10 Exhibit S-8.2, Discovery Response STDE-3.11i

11 Q. Were these exhibits developed by you or under your supervision?

12 A. Yes.

13 C&I Battery Storage Demand Response Pilot

14 Q. Please describe the Company's proposal for the C&I battery storage pilot.

15 A. The Company is proposing to install two batteries on large customer sites. Each  
16 battery will be up to 250 kW/1 MWh in size with the potential to be located at up  
17 to two customer sites to reduce peak customer and system demand for an event of  
18 up to 4 hours. The Company is targeting customers who are enrolled on the  
19 Company's D4 rate, D6.2 rate or D11 rate.<sup>1</sup>

20 Q. Has the Company requested recovery of this program previously?

---

<sup>1</sup> DTE Exhibit A-12, B5.6.1.

**QUALIFICATIONS OF CODY S. MATTHEWS**  
**CASE NUMBER U-21534**  
**PART II**

1 A. Yes. In the Company’s previous rate cases U-20836, and U-21297, DTE  
2 requested approval of this program.

3 Q. Did the Commission take a position on this program in that filing?

4 A. Yes. In its order in case No. U-20836 the Commission found the proposal to be  
5 lacking details, which made it impossible for the Commission to evaluate the  
6 potential effectiveness of the pilot and whether it will provide sufficient benefit to  
7 ratepayers in relation to the cost.<sup>2</sup> While its order in Case No. U-21297 the  
8 Commission agreed with Staff’s recommendation in that case to disallow half of  
9 the program costs the Commission stated, “Commission finds it would not be  
10 reasonable or prudent, in this case, to approve funding for a second participant  
11 that has not been identified.”<sup>3</sup>

12 Q. Has the Company provided more details about the proposed program in this  
13 filing?

14 A. The Company provided an update that it has the storage equipment but is waiting  
15 on switch gear equipment due to the extended lead time.<sup>4</sup> While the Company has  
16 continued to look for customers to participate it has not been successful at this  
17 time. Additionally, the Company has not completed the installation of the first  
18 participants battery and therefore has not begun any testing of the battery for the  
19 purposes of the pilot. While Staff understands the long lead times for the  
20 equipment, Staff does have concerns about the amount of time it is taking to find  
21 a second customer who is willing to participate. Given that this program appears

---

<sup>2</sup> U-20836 11/18/2022 Commission Order p.316

<sup>3</sup> U-21297 12/1/2023 Commission Order p. 247

<sup>4</sup> Testimony of Keegan O. Farrell, p.30

**QUALIFICATIONS OF CODY S. MATTHEWS**  
**CASE NUMBER U-21534**  
**PART II**

1 to have minimal costs to the participant and provides the participant with  
2 essentially \$2,000,000 in battery equipment to utilize on site without charging a  
3 fee, Staff would have expected much more interest in the program. Additionally,  
4 the company still has no agreements in place with the first participant on battery  
5 use or charging which would be required prior to the operation of the battery.<sup>5</sup>

6 Q. Does Staff have any recommendations about this pilot?

7 A. Yes. Staff recommends the Company limit the current pilot to a single participant  
8 given the difficulty the Company has experienced in finding a willing second  
9 participant to date. This would allow the Company to focus on the single  
10 participant that has agreed to participate and allow more flexibility in the use of  
11 the second battery. Staff recommends the Company then use this second battery  
12 to conduct a follow-up pilot once it is able to gain operational information from  
13 the initial pilot. Given that the Company is not planning to charge a fee to  
14 participating customers for enrollment in the program, Staff recommends that the  
15 second pilot have a fee structure for participation.<sup>6</sup> As discussed in more detail  
16 below, Staff finds it important to pilot charging a fee for this type of program, as  
17 this would more closely mirror what a program of this type would look like and  
18 allow for a gauge of customer interest. Once the Company has begun testing and  
19 determining a value of this program Staff recommends finding a second  
20 participant and charging some portion of the battery cost to the participating  
21 customer.

---

<sup>5</sup> Exhibit S-8.0 Discovery Response STDE-3.11h

<sup>6</sup> Exhibit S-8.1 Discovery Response STDE-3.11g

**QUALIFICATIONS OF CODY S. MATTHEWS**  
**CASE NUMBER U-21534**  
**PART II**

1 Q. Has the Commission commented on this issue previously?

2 A. Yes. In order in Case No. U-21297 the Commission found that that consideration  
3 of whether the cost of the battery should be shared with future C&I participants,  
4 and a method for the customer to share the energy savings from use of the battery,  
5 should be conducted when and if the pilot is transitioned to a permanent  
6 program.<sup>7</sup>

7 Q. Why does Staff find it to be important that the second participant have some kind  
8 of fee to participate?

9 A. There are several reasons Staff finds it to be important that that a fee structure be  
10 made for a second participant. First, this would be more representative of how a  
11 final program of this type may work. Previously the Company proposed a  
12 residential battery program which involved the customers paying for a portion of  
13 the battery. While that program was much smaller in scale it is important to note  
14 that the Company's proposal included a fee associated with joining that program.  
15 Additionally other national battery programs such as Green Mountain Power's  
16 battery program<sup>8</sup> also includes a fee to participate. Additionally, it is Staff's  
17 opinion is that if a customer is required to pay to participate in the program than  
18 those customers more likely to utilize the storage to its highest capabilities to  
19 ensure the participation cost is recouped in the savings. Said differently, if a  
20 participating customer has paid to participate in the program there is an incentive  
21 to utilize the battery to recover those costs. Participating customers will be able to

---

<sup>77</sup> U-21297 12/1/2023 Commission Order p. 247

<sup>8</sup> <https://greenmountainpower.com/rebates-programs/home-energy-storage/powerwall/>

**QUALIFICATIONS OF CODY S. MATTHEWS**  
**CASE NUMBER U-21534**  
**PART II**

1           utilize the battery to reduce demand charges and shift load away from peak times  
2           which will allow them to benefit the grid and recoup the participation costs. This  
3           incentive to utilize the battery is not the same for participating customers that  
4           have no costs to participate as this arrangement has no costs to recoup through  
5           utilization of the battery.

6   Q.    Does the Company have plans for the end of the pilot?

7   A.    Yes. The Company is planning to give the customer an option to purchase or rent  
8           the battery or have it removed.<sup>9</sup>

9   Q.    Does Staff find this proposal for the end of the pilot to be reasonable?

10   A.    Yes. This is a very reasonable plan for the end of the pilot, but this plan does  
11           confirm that there is value in charging a fee for the customer to participate in the  
12           program. Given that the customer would need to purchase or rent the battery at  
13           the end of the pilot, the Company itself is acknowledging that a payment for a  
14           customer to participate is necessary for a full-scale program. If the Company were  
15           to charge a fee for participation the customer would be accustomed to a fee and  
16           using the battery to recoup its costs. This may make the customer more likely to  
17           retain the battery and not strand DTE with a large battery with no plan to use at  
18           this time. Staff finds it critical to test whether payments for participation would  
19           impact the customer's utilization of the battery, which is accomplished by Staff's  
20           recommended two-phased pilot approached.

21   Q.    Does Staff have any further recommendations?

---

<sup>9</sup> Staff Exhibit S-8.2

**QUALIFICATIONS OF CODY S. MATTHEWS**  
**CASE NUMBER U-21534**  
**PART II**

1 | A. Yes. As previously mentioned, Staff is recommending the pilot be limited to a  
2 | single customer at this time. Given this recommendation Staff is also  
3 | recommending a disallowance of \$2,000,000 for this program which is broken  
4 | down as \$1.4 million during the bridge and \$0.6 million in the forecasted test  
5 | year.<sup>10</sup>

6 | Q. Does this conclude your testimony?

7 | A. Yes

---

<sup>10</sup> Testimony of Keegan O. Farrell, p. 32

**STATE OF MICHIGAN**  
**BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

\* \* \* \*

In the matter of the application of	)	
<b>DTE ELECTRIC COMPANY</b>	)	
for authority to increase its rates, amend	)	Case No. U-21534
its rate schedules and rules governing the	)	
distribution and supply of electric energy,	)	
<u>and for miscellaneous accounting authority.</u> )	)	

**EXHIBITS OF**  
**ENERGY OPERATIONS DIVISION**  
**MICHIGAN PUBLIC SERVICE COMMISSION**

**July 26, 2024**

**MPSC Case No:** U-21534

---

**Requester:** Staff

---

**Question No.:** STDE-3.11h

---

**Respondent:** K. Farrell

---

**Page:** 1 of 1

---

**Question:** 11. Concerning the C&I Battery Energy Storage Pilot detailed in Exhibit A-12, Sch.B5.6.1:

h. Has the Company developed any commercial arrangements that will balance the different control and use possibilities split between the Company and customer?

**Answer:** No, a commercial arrangement has not yet been developed.

**Attachment:** *None*

**MPSC Case No:** U-21534

---

**Requester:** Staff

---

**Question No.:** STDE-3.11g

---

**Respondent:** K. Farrell

---

**Page:** 1 of 1

---

**Question:** 11. Concerning the C&I Battery Energy Storage Pilot detailed in Exhibit A-12, Sch.B5.6.1:

g. Referring to the Company's discovery response STDE-3.2i from Case No. U-21297, is the Company still planning to not charge fees for participation in the pilot, and has the Company done any calculations to determine the customer savings and battery performance?

**Answer:** The Company has performed calculations to estimate the bill savings a potential customer would receive. However, due to the upfront costs associated with the installation of the battery that are the customer's responsibility, the Company does not plan to charge a fee for participation. Since battery performance is dependent on unique usage characteristics, no additional battery performance calculations have been performed.

**Attachment:** *None*

**MPSC Case No:** U-21534

---

**Requester:** Staff

---

**Question No.:** STDE-3.11i

---

**Respondent:** K. Farrell

---

**Page:** 1 of 1

---

**Question:** 11. Concerning the C&I Battery Energy Storage Pilot detailed in Exhibit A-12, Sch.B5.6.1:

- i. What is the Company planning to do with the battery after pilot has concluded? Has the Company considered a longer-term agreement to ensure use for the full life of the battery and installation equipment?

**Answer:** At the conclusion of the pilot, the customer can purchase the battery outright, lease to own, rent the equipment or have the battery removed. Dependent upon the customer's decision, a further term agreement would be necessary.

**Attachment:** *None*

**DTE Fleet Spending - Capital Purchases**

Year	Rate Case	Amount
2021	21297	\$46,346,506
2022	21297	\$43,820,948
2023	21534	\$29,347,214
2024	21534	\$35,391,032
2025	21534	\$42,595,010

**DTE Fleet Capital Purchases Plan**

Year	# of Purchases (Approximate)	Amount
2023	570	\$29,347,214
2024	360	\$35,391,032
2024	260	\$42,595,010

**DTE Fleet Spending - Capital Repair Expenses**

Year	Rate Case	Amount
2020	21297	\$407,844
2021	21297	\$455,190
2022	21297	\$891,585
2023	21534	\$948,104
2024	21534	\$975,599
2025	21534	\$1,003,892

**DTE Fleet Spending - O&M Repair Expenses**

Year	Rate Case	Amount
2020	21297	\$10,150,289
2021	21297	\$9,739,263
2022	21297	\$8,912,952
2023	21534	\$10,023,219
2024	21534	\$10,313,892
2025	21534	\$10,612,995

**MPSC Case No:** U-21534

---

**Requester:** Staff

---

**Question No.:** STDE-4.4

---

**Respondent:** T. Uzenski

---

**Page:** 1 of 1

---

**Question:** 4. Who provides O&M work to Company fleet vehicles, such as oil changes, tire rotations, and brake replacements?

**Answer:** Approximately 92% of O&M work for Company vehicles is completed in-house. The remaining work is completed by various external service providers. Typical outsourced repairs include body work, warranty/recalls, glass work, vehicle alignments, and heavy-duty suspensions.

**Attachment:** *None.*

**MPSC Case No:** U-21534

---

**Requester:** Staff

---

**Question No.:** STDE-4.5

---

**Respondent:** T. Uzenski

---

**Page:** 1 of 1

---

**Question:** 5. Who provides emergent capital work to Company fleet vehicles, such as engine or transmission repairs or other emergency repairs?

**Answer:** Approximately 91% of capital work is completed in-house. The remaining work is completed by various external service providers. Outsourced capital work includes warranty/recalls, engines and transmissions.

**Attachment:** *None.*

U-21534 STDE-1.3-01 Pages 4-9

**Michigan Public Service Commission  
DTE Electric Company  
Projected Capital Expenditures  
Distribution Plant - Connections, Relocations and Other  
(\$000)**

Line No.	Description	Actual 2018	Actual 2019	Actual 2023
1	<b>Connections and New Load</b>			
2	Small Load Growth Projects (Blanket)	\$ 12,613	\$ 15,856	\$ 18,283
3	Customer Connections	84,777	91,418	123,234
4	Customer Connections CIAC	(14,161)	(12,746)	(18,857)
5	Customer Connections (Net of CIAC)	70,616	78,672	104,377
6	New Business Projects	37,842	35,231	73,236
7	New Business Projects CIAC	(12,814)	(8,849)	(6,303)
8	Subtotal New Business Projects (net of CIAC)	25,028	26,382	66,933
9	<b>Total Connections and New Load</b>	<b>135,232</b>	<b>142,504</b>	<b>214,753</b>
10	<b>Total Connections and New Load CIAC</b>	<b>(26,975)</b>	<b>(21,594)</b>	<b>(25,160)</b>
11	<b>Total Connections and New Load (Net of CIAC)</b>	<b>108,257</b>	<b>120,910</b>	<b>189,593</b>
12	<b>Relocations</b>			
13	Small Relocation Projects (Blanket)	7,607	8,316	7,098
14	Major Infrastructure Relocation Project			
15	Gordie Howe International Bridge I-375 Electric Relocations	10,915	5,351	- 6,334
16	Relocation Projects (excl.Major Infrastructure Projects)	7,661	3,662	24,650
17	Relocation Projects CIAC	(3,648)	-	(466)
18	Subtotal Relocation Projects (Net of CIAC)	4,013	3,662	24,184
19	<b>Total Relocations</b>	<b>26,183</b>	<b>17,328</b>	<b>38,082</b>
20	<b>Total Relocations CIAC</b>	<b>(3,648)</b>	<b>-</b>	<b>(466)</b>
21	<b>Total Relocations (Net of CIAC)</b>	<b>22,535</b>	<b>17,328</b>	<b>37,615</b>
22	<b>Electric System Equipment</b>			
23	Distribution Transformers & Regulators	25,827	27,693	816
24	Major Equipment	14,945	11,759	11,470
25	Meters	11,196	10,801	15,384
26	<b>Total Electric System Equipment</b>	<b>51,967</b>	<b>50,253</b>	<b>27,670</b>
27	<b>NRUC and Improvement Blankets</b>			
28	System Improvements	8,887	10,166	8,020
29	Normal Retirement Unit Changeouts (NRUC)	3,782	7,220	3,888
30	Operational Technologies	2,955	2,800	7,834
31	Batteries and Chargers	2,221	1,400	-
32	Animal Mitigation	35	4	-
33	<b>Total NRUC and Improvement Blankets</b>	<b>17,879</b>	<b>21,589</b>	<b>19,742</b>
34	<b>General Plant, Tools &amp; Equipment and Miscellaneous</b>			
35	Substation Physical Security	-	704	88
36	Warren SC Transformer Yard Reorganization	-	-	-
37	General Plant, Tools & Equipment and Miscellaneous	5,887	4,815	6,002
38	<b>Total General Plant, Tools &amp; Equipment and Miscellaneous</b>	<b>5,887</b>	<b>5,519</b>	<b>6,090</b>
39	<b>Public Lighting Department Project</b>			<b>2,186</b>
40	<b>Total Customer Connections, Relocations &amp; Other</b>	<b>237,147</b>	<b>237,193</b>	<b>308,523</b>
41	<b>Total Cust Connections, Relocations &amp; Other CIAC</b>	<b>(30,623)</b>	<b>(21,594)</b>	<b>(25,626)</b>
42	<b>Total Cust Connections, Relocations &amp; Other Net of CIAC</b>	<b>\$ 206,525</b>	<b>\$ 215,599</b>	<b>\$ 282,897</b>

**MPSC Case No:** U-21534

---

**Requester:** STAFF

---

**Question No.:** STDE-12.1a

---

**Respondent:** B. Hill

---

**Page:** 1 of 1

---

**Question:** 1. Referring to page 6 of Exhibit A-12, Schedule B5.4, prepared by witness Hill, attached, please provide explanation for the actual reported expenditure in category 'Relocation Projects (excl. Major Infrastructure Projects)' for 2023 of \$24.65 million in comparison to the 3-year historical average of \$13.02 million. This actual expenditure amount of \$24.65 million was reported in document 'U-21534 STDE 1.3-01 Pages 4-9', provided by DTE as part of a response to Staff's first discovery request in this case.

a. How many projects in this category for 2023 were at the request of a state agency, such as MDOT?

**Answer:** Please see table below for details of Relocation Projects (excl. Major Infrastructures Projects) in 2023:

<b>Customer</b>	<b>Projects</b>	<b>Capital Investment</b>	
		<b>(\$ thousands)</b>	
State Agency	10	\$	8,448
County Agency	8	\$	10,891
City Agency	6	\$	1,007
Ordinary Customer	10	\$	4,304
<b>Total</b>	<b>34</b>	<b>\$</b>	<b>24,650</b>

**Attachment:** N/A





Ford	F250	73,268.67
Ford	F250	73,268.67
Ford	F350	39,770.70
Ford	F350	39,770.70
Ford	F350	39,770.70
Ford	F350	39,770.70
Ford	F350	39,770.70
Ford	F350	47,902.27
Ford	F350	47,902.27
Ford	F350	47,902.27
Ford	F350	47,902.27
Ford	F350	47,902.27
Ford	F350	47,657.66
Ford	F350	47,657.66
Ford	F350	47,657.66
Ford	F350	47,657.66
Ford	F350	50,909.37
Ford	F350	50,859.37
Ford	F350	51,275.49
Ford	F350	50,915.81
Ford	F350	50,909.37
Ford	F350	50,859.37
Ford	F350	51,275.49
Ford	F350	50,915.81
Ford	F350	15,464.40
Ford	F350	44,235.12
Ford	F350	15,464.40
Ford	F350	44,235.12
Ford	F350	15,464.40
Ford	F350	44,235.12
Ford	F350	15,464.40
Ford	F350	44,235.12
Ford	F350	15,464.40
Ford	F350	44,235.12
Ford	F350	44,235.12
Ford	F350	20,371.57
Ford	F350	20,371.57
Ford	F350	20,371.57
Ford	F350	20,371.57
Ford	F350	20,371.57
Ford	F350	20,371.57
Ford	F350	20,371.57
Ford	F350	20,371.57
Ford	F350	20,371.57
Ford	F350	20,371.57
Ford	F350	47,571.11
Ford	F350	47,571.11
Ford	F350	47,571.11
Ford	F350	47,571.11
Ford	F350	47,571.11
Ford	F350	37,895.54
Ford	F350	56,835.82
Ford	F350	56,835.82
Ford	F450	100,711.76
Ford	F450	100,711.76
Ford	F450	100,711.76
Ford	F450	100,711.76







CHEVROLET	SILVERADO EV	77,763.45
CHEVROLET	SILVERADO EV	77,763.45
CHEVROLET	SILVERADO EV	77,763.45
CHEVROLET	SILVERADO EV	77,763.45
CHEVROLET	SILVERADO EV	77,763.45
CHEVROLET	SILVERADO EV	77,763.45
CHEVROLET	SILVERADO EV	77,763.45
CHEVROLET	SILVERADO EV	77,763.45
CHEVROLET	SILVERADO EV	82,824.84
CHEVROLET	SILVERADO EV	82,824.84
CHEVROLET	SILVERADO EV	82,824.84
CHEVROLET	SILVERADO EV	82,824.84
CHEVROLET	SILVERADO EV	82,824.84
CM Welding	Small 6 Tube Nitrogen	118,087.00
CM Welding	Small 6 Tube Nitrogen	118,087.00
TENNANT	T300	15,013.24
Ford	T350	55,166.06
Ford	T350	25,704.97
Ford	T350	27,281.56
Ford	T350	27,281.56
Ford	T350	27,281.56
Ford	T350	27,281.56
Ford	T350	21,753.51
Ford	T350	21,753.51
Ford	T350	21,753.51
Ford	T350	21,753.51
Ford	T350	21,753.51
Ford	T350	21,753.51
Ford	T350	21,753.51
Ford	T350	12,080.93
Ford	T350	12,080.93
Ford	T350	12,080.93
Ford	T350	12,080.93
Ford	T350	12,080.93
Ford	T350	12,080.93
Ford	T350	58,724.58
Ford	T350 (MILLWRIGHT)	59,208.67
Ford	T350 (MILLWRIGHT)	59,208.67
Ford	T350 (MILLWRIGHT)	59,208.67
Ford	T350 148WB	58,996.48
Tennant	T500 WALK BEHIND	14,062.80
ALTEC	Tandem Digger (AWD) (JEMS)	120,695.84
ALTEC	Tandem Digger (AWD) (JEMS)	120,695.84
ALTEC	Tandem Digger (AWD) (JEMS)	120,695.84
ALTEC	Tandem Digger (AWD) (JEMS)	120,695.84
ALTEC	Tandem Digger (AWD) (JEMS)	120,695.84
ALTEC	Tandem Digger (FWD) (JEMS)	120,695.84
ALTEC	Tandem Digger (FWD) (JEMS)	120,695.84
ALTEC	Tandem Digger (FWD) (JEMS)	120,695.84
ALTEC	Tandem Digger (FWD) (JEMS)	120,695.84
TOWMASTER	TC-12HD	20,587.00
NORAMP	U-14	16,207.00
POLARIS	XP 1000 NorthStar	37,317.29
2022 Electric Tools	0000204565-SHELVING INC	22,886.43
2023 Electric Tools	0000200186-ALLIED INC	85,116.00
2023 Electric Tools	0000201767-CDW DIRECT LLC	19,748.40
2023 Electric Tools	0000203306-IDSC HOLDINGS LLC	47,178.41
2023 Electric Tools	0000205352-EXPERT AUTO ACCENTS INC	11,850.00
2023 Electric Tools	0000211104-CUMMINS INC	25,264.52
2023 Electric Tools	0000230744-APH STORES INC	19,493.88

2023 Electric Tools            0000231898-AUTO WARES LLC

	<u>28,344.27</u>	
\$	<b>28,629,291.66</b>	<b>Total</b>
\$	<b>717,922.62</b>	<b>Total of Items Less than \$10K</b>
\$	<u><u><b>29,347,214.28</b></u></u>	<b>Grand Total 2023</b>









**Actual Vehicle and Equipment purchases year-to-date (1/1/2024 through 4/30/2024)**

<u>Make</u>	<u>Model</u>	<u>Cap Ex</u>
CROWN	C5P1050-65	68,230.67
CROWN	C5P1050-65	68,230.67
YALE	ERC065VG	65,487.33
YALE	ERC065VG	65,487.33
JLG	ES1932	17,500.00
JLG	ES1932	17,500.00
JLG	ES1932	17,500.00
JLG	ES1932	17,500.00
JLG	ES2632	26,182.00
Ford	F150 HYBRID	22,535.00
Ford	F250	10,539.62
Ford	F250	10,539.62
Ford	F250	10,539.62
Ford	F250	10,539.62
Ford	F250	10,539.62
Ford	F250	10,539.62
Ford	F250	10,539.62
Ford	F250	10,539.62
Ford	F250	10,539.62
Ford	F250	10,539.62
Ford	F250	10,539.62
Ford	F250	10,539.62
Ford	F250	10,539.62
Ford	F250	10,539.62
FORD	F250	17,515.92
FORD	F250	17,515.92
FORD	F250	17,515.92
Ford	F350	28,314.87
Ford	F350	28,314.87
Ford	F450	97,518.36
YALE	GP060VX	67,821.45
YALE	GP060VX	67,821.45
HOT	HOT Trailblazer	16,436.84
FREIGHTLINER/ALTEC	M2106 / AA55E (JEMS)	428,512.04
FREIGHTLINER/ALTEC	M2106 / AA55E (JEMS)	428,512.04
EZ STAK	Material Trailer	50,167.68
FORD	MAVERICK AWD	23,879.96
FORD	MAVERICK AWD	23,879.96
FORD	MAVERICK AWD	23,879.96
FORD	MAVERICK AWD	23,879.96
ALLMAND	NightLite GR3	13,250.00
ALLMAND	NightLite GR3	13,250.00
ALLMAND	NightLite GR3	13,250.00

ALLMAND	NightLite GR3	13,250.00
KUBOTA	RTVX1100CWLH	48,665.66
KUBOTA	RTVX1100CWLH	48,665.66
CHEVROLET	SILVERADO 2500	53,514.90
CHEVROLET	SILVERADO 2500	53,514.90
CHEVROLET	SILVERADO 2500	53,514.90
CHEVROLET	SILVERADO 2500	53,514.90
CHEVROLET	SILVERADO 2500	53,514.90
CHEVROLET	SILVERADO 2500	53,514.90
CHEVROLET	SILVERADO 2500	53,514.90
CHEVROLET	SILVERADO 2500	53,514.90
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO 3500	49,892.91
CHEVROLET	SILVERADO EV	21,321.78
CHEVROLET	SILVERADO EV	21,321.78
CHEVROLET	SILVERADO EV	21,321.78
CHEVROLET	SILVERADO EV	21,321.78
CHEVROLET	SILVERADO EV	21,321.78
DREXEL	SL40AC	122,127.90
Ford	T350	19,987.00
Ford	T350	51,084.16

Ford	T350	19,987.00
Ford	T350 (MILLWRIGHT)	25,345.67
Ford	T350 (MILLWRIGHT)	25,345.67
Ford	T350 (MILLWRIGHT)	25,345.67
Ford	T350 130WB	34,699.60
TENNANT	T600	21,135.41
FORD	TRANSIT 350 MR 148WB	52,551.04
CROWN	WAVE60-118	28,401.64
KARCHER	BR 75/110 R	26,404.60
2023 Electric Tools	0000200000-BAKERS GAS AND WELDING SUPPLIES	15,206.76
2023 Electric Tools	0000200186-ALLIED INC	148,849.44
2023 Electric Tools	0000201508-VESCO OIL CORP	38,419.61
2023 Electric Tools	0000203306-IDSC HOLDINGS LLC	141,474.69
2023 Electric Tools	0000205498-BETTER BOLTING INC	112,360.00
2023 Electric Tools	0000211104-CUMMINS INC	13,282.21
2023 Electric Tools	0000226238-MYERS TIRE SUPPLY DISTRIBUTION IN	34,107.03
		<hr/>
		<b>\$ 4,943,910.48 Total</b>



Monroe Bottom Ash Conversion Breakdown from STDE-2.2b

	Forecast Jan-25	Forecast Feb-25	Forecast Mar-25	Forecast Apr-25	Forecast May-25	Forecast Jun-25	Forecast Jul-25	Forecast Aug-25	Forecast Sep-25	Forecast Oct-25	Forecast Nov-25	Forecast Dec-25	Jan-Dec 2025
Units 1&2	\$ 693,229	\$ 354,739	\$ 300,030	\$ 483,463	\$ 621,132	\$ 2,134,056	\$ 2,797,296	\$ 2,243,064	\$ 2,284,989	\$ 2,286,782	\$ 3,131,219	\$ 659,724	\$ 17,989,722
Units 3&4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Common	\$ 73,770	\$ 73,770	\$ 73,770	\$ 73,770	\$ 73,770	\$ 73,770	\$ 73,770	\$ 73,770	\$ 73,770	\$ 73,770	\$ 73,770	\$ 73,770	\$ 885,241
<b>Total</b>	<b>\$ 766,999</b>	<b>\$ 428,509</b>	<b>\$ 373,800</b>	<b>\$ 557,233</b>	<b>\$ 694,902</b>	<b>\$ 2,207,826</b>	<b>\$ 2,871,066</b>	<b>\$ 2,316,834</b>	<b>\$ 2,358,759</b>	<b>\$ 2,360,552</b>	<b>\$ 3,204,989</b>	<b>\$ 733,494</b>	<b>\$ 18,874,963</b>

Costs without contingency from updated project sheets provided in response to STDE-2.1d

<u>2025</u>	
PMP 15134	\$ 14,900,464
PMP 19356	\$ 2,048,273
PMP 19357	\$ 16,414
<b>Total</b>	<b>\$ 16,965,151</b>

2025 Total from updated project sheets	\$ 16,965,151
Jan-Dec 2025 costs in case	\$ 18,874,963
<b>Reduction in project costs from Updated project sheets</b>	<b>\$ (1,909,812)</b>



ENERGY SUPPLY PAT REVIEW REQUEST FORM

PAT-AT Agenda Date: 3/13/2024  
 PMP Project ID: 15134  
 PAT LVL/REV: PAT 2 REV 0

Scope Change  New Revision  Cancel  
 Schedule Change  Realized Risk

Project Site: MONPP  
 Unit: Common  
 Outage Related?: Yes  
 Current IRR: N/A  
 SAP Profit Center #: 0202R165-FG MNPP COM CA  
 WBS Element: I-000022-0367  
 Project Type/Systems: 14 Common  
 Reconciliation Category: Engineering & Long Lead for Future Projects

**Brief Project Scope Summary** (Summarize products & services provided)

- Addition of new grinders and compact submerged conveyors(CSC) under each unit's bottom ash hoppers.
- Addition of pipe-style belt conveyors to collect and transport bottom ash from CSCs
- Addition of bottom ash loadout bunker
- Adjustment of truck access routes and grading around bunkers in order to accommodate truck traffic to and from bunkers
- Eliminate tie between economizer ash removal system and bottom ash system. The economizer ash removal system will be replaced by a drag chain conveyor system tied into the ELG compliant dry flyash system under separate projects.

**Project Title:** Monroe Bottom Ash Conversion (ELG)

**PMP Problem Description & Project Objective** (Project deliverables? Sum benefits-attach extra sheets if required):  
 PROBLEM: Monroe Units 1-4 currently have bottom ash sluicing and dewatering systems that do not meet the proposed criteria established in the Effluent Limitation Guidelines (ELG) as the transport water is discharged in a once-through operation. According to the proposed rules, conversion to dry handling or a high recycling system is required no later than 12/31/2023.  
 OBJECTIVE: The plant will implement a cost-effective project to satisfy the proposed ELG mandate related to bottom ash. Preliminary engineering has confirmed that compliance can be accomplished with a closed-loop, high-recycle system that recirculates the water sent to the existing Bottom Ash Dewatering System (BADs) and uses it for bottom ash sluicing, spray water, bottom ash hopper and boiler seal trough uses. The proposed rule, which is expected to be finalized later this year, allows for blowdown to the FGD and, under certain conditions, to the chem ditch. Blowdown is needed to maintain a balanced chemistry of the recirculated water.

**Reason for Submittal** (State reason for submittal, categorize requested dollar amount changes, and explain any estimate at completion (EAC) benefits or IRR changes):  
**PAT 2 revision to true-up 2023 costs and request release of funding to cover construction costs based on labor bids received and most up to date estimates for engineering and DTE construction support.**

**Project cost changes as follows:**  
 DTE Labor: Decreased \$83,354 due to less than expected hours from all DTE teams in 2023 and later construction start date than expected in 2024.  
 Contract Labor: Decreased \$1,583,618 based on labor bids received.  
 Material: Increased \$229,099 based on recent material bids.  
 Other: Increased \$5,268.  
 Shared Costs: No change.  
 Indirects: Decreased \$558,586 based on above changes and latest indirect rates.  
 Calculated Risk: Increased \$1,991,191 to maintain EAC.

No Change to EAC.

SAP Budget Approval	Prior Years	2023	2024	2025
Previously Approved PAT:	\$10,412,386	\$9,043,950	\$5,539,411	\$0
PAT Change Request:	\$0	\$0	\$15,101,096	\$14,900,464
Current PAT Request:	\$10,412,386	\$9,043,950	\$20,640,507	\$14,900,464
Total PAT Request:	\$54,997,307		Total PAT Change:	\$30,001,560

Forecast Charge Categories	Current Approved PAT Form				Forecast Changes				Revised PAT Forecast				Project Total (EAC)	
	Prior Years	2023	2024	2025	Prior Years	2023	2024	2025	Prior Years	2023	2024	2025		
DTE Labor (Direct)	\$138,176	\$65,517	\$390,000	\$174,493	\$0	-\$3,089	-\$80,265	\$0	\$138,176	\$62,428	\$309,735	\$174,493	\$684,832	
Contract Labor (Direct)	\$5,640,125	\$1,779,343	\$13,149,913	\$13,585,740	\$0	\$295,000	-\$578,618	-\$1,300,000	\$5,640,125	\$2,074,343	\$12,571,295	\$12,285,740	\$32,571,503	
Material (Direct)	\$3,378,814	\$6,355,694	\$5,716,270	\$1,110,541	\$0	\$11,373	\$217,726	\$0	\$3,378,814	\$6,367,067	\$5,933,996	\$1,110,541	\$16,790,418	
Other (Direct)	\$4,423	\$0	\$0	\$0	\$0	\$200	\$5,068	\$0	\$4,423	\$200	\$5,068	\$0	\$9,691	
Shared Costs	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
Indirects	\$1,250,848	\$843,396	\$2,130,786	\$1,577,612	\$0	-\$291	-\$310,373	-\$247,922	\$1,250,848	\$843,105	\$1,820,413	\$1,329,690	\$5,244,056	
Sub-Total	\$10,412,386	\$9,043,950	\$21,386,969	\$16,448,386	\$0	\$303,193	-\$746,462	-\$1,547,922	\$10,412,386	\$9,347,143	\$20,640,507	\$14,900,464	\$55,300,500	
Calculated Risk	\$0	\$500,000	\$18,700,867	\$18,407,442	\$0	-\$500,000	\$2,491,191	\$0	\$0	\$0	\$21,192,058	\$18,407,442	\$39,599,500	
<b>TOTAL</b>	<b>\$10,412,386</b>	<b>\$9,543,950</b>	<b>\$40,087,836</b>	<b>\$34,855,828</b>	<b>\$0</b>	<b>-\$196,807</b>	<b>\$1,744,729</b>	<b>-\$1,547,922</b>	<b>\$10,412,386</b>	<b>\$9,347,143</b>	<b>\$41,832,565</b>	<b>\$33,307,906</b>	<b>\$94,900,000</b>	
Change in Total EAC:														\$0

Project Developer: R. Luberacki  
 Project Engineer: S. Labaf  
 Project Manager: P. Duran

APPROVAL DISPOSITION:  
 Without Risk:  
 With Risk:  Approved by: \_\_\_\_\_ Date: 3-13-24



ENERGY SUPPLY PAT REVIEW REQUEST FORM

PAT-AT Agenda Date:	1/24/2024
PMP Project ID:	19356
PAT LVL/REV:	PAT 2 REV 0

<input type="checkbox"/>	Scope Change	<input checked="" type="checkbox"/>	New Revision	<input type="checkbox"/>	Cancel
<input type="checkbox"/>	Schedule Change	<input type="checkbox"/>	Realized Risk		

Project Site:	MONPP	Project Complexity:	Medium
Unit:	1	Project Start Date:	10/17/2022
Outage Related?	Yes	Constr. Start Date:	7/8/2024
Current IRR:	N/A	Project I/S Date:	11/29/2025
SAP Profit Center #:	0202R169-FG MNPP U1 CAP	Investment Reason:	9 Environmental
WBS Element:	I-000022-0455		
Project Type/Systems:	08 Plant Waste		
Reconciliation Category:	Approved Projects in Development		

Project Title: MONPP U1 Economizer Ash Conveyor (ELG)

**PMP Problem Description & Project Objective** (Project deliverables? Sum benefits-attach extra sheets if required):

PROBLEM: Ash from the existing Economizer Ash Handling systems is currently sluiced to the BADS system and will need to be separated in order to be comply with the ELG Rule. Also, the existing Economizer Ash Hoppers experience frequent pluggage when operating with fuel blends consisting of Pet coke. The current system is not designed to convey large particles of ash as found when burning pet coke blends, nor is the system designed for continuous operation. This results in increased cleaning of the hoppers and O&M expense, as well as dedicated Operator when in use.

OBJECTIVE: Replace the current economizer ash system conveyor which is tied in with the dry fly ash system.

**Brief Project Scope Summary** (Summarize products & services provided)

Engineer, procure and install a conveyor system which conveys to a holding tank, and then pneumatically conveyed from the holding tank to the dry fly ash filter separator.

**Reason for Submittal** (State reason for submittal, categorize requested dollar amount changes, and explain any estimate at completion (EAC) benefits or IRR changes):

**This is a PAT 2 request to update 2023 to actual costs and request release of \$1,708,564 to cover constructions costs.**

Project cost changes as follows:  
 DTE Labor: Decreased \$11,490 due to less than expected spend in 2023.  
 Contract Labor: Increased \$1,085,356 based on labor bids received and remaining material being purchased by contractor.  
 Material: Decreased \$1,467,052, due to materials being purchased by the installation contractor.  
 Other: No change.  
 Shared Costs: Increased \$13,640 based on bids received and updated DTE labor costs.  
 Indirects: Decreased \$137,083 based on above changes and latest indirect rates.

**Increased Calculated Risk by \$516,629 to maintain EAC.**

SAP Budget Approval	2022	2023	2024	2025
Previously Approved PAT:	\$480,881	\$900,274	\$1,613,344	\$200,000
PAT Change Request:	\$0	-\$342,721	\$203,012	\$1,848,273
Current PAT Request:	\$480,881	\$557,553	\$1,816,356	\$2,048,273
Total PAT Request:	\$4,903,063		Total PAT Change:	\$1,708,564

Forecast Charge Categories	Current Approved PAT Form				Forecast Changes				Revised PAT Forecast				Project Total (EAC)
	2022	2023	2024	2025	2022	2023	2024	2025	2022	2023	2024	2025	
DTE Labor (Direct)	\$487	\$17,710	\$29,000	\$79,740	\$0	-\$11,490	\$0	\$0	\$487	\$6,220	\$29,000	\$79,740	\$115,447
Contract Labor (Direct)	\$0	\$85,000	\$120,000	\$1,745,294	\$0	-\$85,000	\$1,440,974	-\$270,618	\$0	\$0	\$1,560,974	\$1,474,676	\$3,035,650
Material (Direct)	\$439,548	\$665,265	\$1,173,354	\$0	\$0	-\$293,698	-\$1,173,354	\$0	\$439,548	\$371,567	\$0	\$0	\$811,115
Other (Direct)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Shared Costs	\$0	\$0	\$0	\$133,082	\$0	\$0	\$0	\$13,640	\$0	\$0	\$0	\$146,722	\$146,722
Indirects	\$40,846	\$132,299	\$290,990	\$382,077	\$0	-\$37,533	-\$64,608	-\$34,942	\$40,846	\$94,766	\$226,382	\$347,135	\$709,129
Sub-Total	\$480,881	\$900,274	\$1,613,344	\$2,340,193	\$0	-\$427,721	\$203,012	-\$291,920	\$480,881	\$472,553	\$1,816,356	\$2,048,273	\$4,818,063
Calculated Risk	\$0	\$0	\$0	\$865,308	\$0	\$0	\$381,937	\$134,692	\$0	\$0	\$381,937	\$1,000,000	\$1,381,937
<b>TOTAL</b>	<b>\$480,881</b>	<b>\$900,274</b>	<b>\$1,613,344</b>	<b>\$3,205,501</b>	<b>\$0</b>	<b>-\$427,721</b>	<b>\$584,949</b>	<b>-\$157,228</b>	<b>\$480,881</b>	<b>\$472,553</b>	<b>\$2,198,293</b>	<b>\$3,048,273</b>	<b>\$6,200,000</b>

Change in Total EAC: \$0

Project Developer:	Sulove Patel	APPROVAL DISPOSITION:	
Project Engineer:	Saeid Labaf	Without Risk:	<input type="checkbox"/>
Project Manager:	Paul Duran	With Risk:	<input type="checkbox"/>

Approved by:		Date:	1/24/24
--------------	---	-------	---------

	<b>ENERGY SUPPLY PAT REVIEW REQUEST FORM</b>			
	PAT-AT Agenda Date:	1/24/2024	<input type="checkbox"/> Scope Change	<input checked="" type="checkbox"/> New Revision
	PMP Project ID:	19357	<input type="checkbox"/> Schedule Change	<input checked="" type="checkbox"/> Realized Risk
PAT LVL/REV:		PAT 2 REV 0		<input type="button" value="Cancel"/>

Project Site:	MONPP	Project Complexity:	Medium
Unit:	2	Project Start Date:	10/17/2022
Outage Related?	Yes	Constr. Start Date:	5/6/2024
Current IRR:	N/A	Project I/S Date:	11/23/2024
SAP Profit Center #:	0202R173-FG MNPP U2 CAP	Investment Reason:	9 Environmental
WBS Element:	I-000022-0456		
Project Type/Systems:	08 Plant Waste		
Reconciliation Category:	Approved Projects in Development		

**Project Title:** MONPP U2 Economizer Ash Conveyor (ELG)

**PMP Problem Description & Project Objective** *(Project deliverables? Sum benefits-attach extra sheets if required):*

PROBLEM: Ash from the existing Economizer Ash Handling systems is currently sluiced to the BADS system and will need to be separated in order to be comply with the ELG Rule. Also, the existing Economizer Ash Hoppers experience frequent pluggage when operating with fuel blends consisting of Pet coke. The current system is not designed to convey large particles of ash as found when burning pet coke blends, nor is the system designed for continuous operation. This results in increased cleaning of the hoppers and O&M expense, as well as dedicated Operator when in use.

OBJECTIVE: Replace the current economizer ash system conveyor which is tied in with the dry fly ash system.

**Brief Project Scope Summary** *(Summarize products & services provided)*

Engineer, procure and install a conveyor system which conveys to a holding tank, and then pneumatically conveyed from the holding tank to the dry fly ash filter separator.

**Reason for Submittal** *(State reason for submittal, categorize requested dollar amount changes, and explain any estimate at completion (EAC) benefits or IRR changes):*

**This is a PAT 2 request to update 2023 to actual costs and request release of \$1,855,986 to cover constructions costs.**

Project cost changes as follows:  
 DTE Labor: Decreased \$10,081 due to less than expected spend in 2023.  
 Contract Labor: Increased \$1,667,256 based on labor bids received and remaining material being purchased by contractor.  
 Material: Decreased \$1,410,582, due to materials being purchased by the installation contractor.  
 Other: No change.  
 Shared Costs: Increased \$75,029 based on bids recieved and updated DTE labor costs.  
 Indirects: Decreased \$111,167 based on above changes and latest indirect rates.

**Decreased Calculated Risk by \$210,455.**

SAP Budget Approval	2022	2023	2024	2025
Previously Approved PAT:	\$486,019	\$1,594,917	\$1,555,000	\$0
PAT Change Request:	\$0	-\$197,214	\$2,036,786	\$16,414
Current PAT Request:	\$486,019	\$1,397,703	\$3,591,786	\$16,414
<b>Total PAT Request:</b>	<b>\$5,491,922</b>	<b>Total PAT Change:</b>	<b>\$1,855,986</b>	

Forecast Charge Categories	Current Approved PAT Form				Forecast Changes				Revised PAT Forecast				Project Total (EAC)
	2022	2023	2024	2025	2022	2023	2024	2025	2022	2023	2024	2025	
DTE Labor (Direct)	\$158	\$20,367	\$97,633	\$9,234	\$0	-\$9,074	-\$1,007	\$0	\$158	\$11,293	\$96,626	\$9,234	<b>\$117,311</b>
Contract Labor (Direct)	\$5,000	\$547,700	\$1,337,594	\$65,000	\$0	\$294,622	\$1,437,634	-\$65,000	\$5,000	\$842,322	\$2,775,228	\$0	<b>\$3,622,550</b>
Material (Direct)	\$439,695	\$813,240	\$1,030,232	\$0	\$0	-\$440,350	-\$970,232	\$0	\$439,695	\$372,890	\$60,000	\$0	<b>\$872,585</b>
Other (Direct)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	<b>\$0</b>
Shared Costs	\$0	\$0	\$133,082	\$0	\$0	\$0	\$75,029	\$0	\$0	\$0	\$208,111	\$0	<b>\$208,111</b>
Indirects	\$41,166	\$213,610	\$514,019	\$13,737	\$0	-\$42,412	-\$62,198	-\$6,557	\$41,166	\$171,198	\$451,821	\$7,180	<b>\$671,365</b>
Sub-Total	\$486,019	\$1,594,917	\$3,112,560	\$87,971	\$0	-\$197,214	\$479,226	-\$71,557	\$486,019	\$1,397,703	\$3,591,786	\$16,414	<b>\$5,491,922</b>
Calculated Risk	\$0	\$0	\$918,533	\$0	\$0	\$0	-\$210,455	\$0	\$0	\$0	\$708,078	\$0	<b>\$708,078</b>
<b>TOTAL</b>	<b>\$486,019</b>	<b>\$1,594,917</b>	<b>\$4,031,093</b>	<b>\$87,971</b>	<b>\$0</b>	<b>-\$197,214</b>	<b>\$268,771</b>	<b>-\$71,557</b>	<b>\$486,019</b>	<b>\$1,397,703</b>	<b>\$4,299,864</b>	<b>\$16,414</b>	<b>\$6,200,000</b>

Change in Total EAC: **\$0**

Project Developer:	Sulove Patel	APPROVAL DISPOSITION:	
Project Engineer:	Saeid Labaf	Without Risk:	<input type="checkbox"/>
Project Manager:	Paul Duran	With Risk:	<input type="checkbox"/>
Approved by:		Date:	1/24/24

Michigan Public Service Commission  
 DTE Electric Company  
 Actual Capital Expenditures  
 Years 2022 to 2023  
 Routine Maintenance Projects greater than \$1M

Case No.: U-21534  
 Requestor: Staff  
 Question No.: STDE-2.1a  
 Respondent: M. Guillaumin

Line No.	(a) Facility	(b) Calendar Year	(c) Unit	(d) High Level Breakdown	(f) Description	Actual	Actual	Actual	Actual	Actual	Actual
						Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23
68	Belle River/Range Road	2023	2	Safety	Unit 2 LP Turbine Rotor & Blades	129,989	13,900	66,834	864,765	(106,923)	114,429
69	Belle River/Range Road	2023	2	Reliability	Unit 2 Exciter	(3,609)	36,825	31,773	679,598	(17,424)	45,922
70	Belle River/Range Road	2023	2	Reliability	Unit 2 Waterwall Tubes	92,474	149,963	(15,957)	15,431	26,783	(11,977)
71	Belle River/Range Road	2023	2	Safety	Unit 2 IP Turbine Valves	-	79,231	(13,727)	18,732	(2,463)	756
72	Belle River/Range Road	2023	Fuel Supply	Infrastructure	Fuel Supply & Common Systems Separation from St. Clair Power Plant	790,386	743,039	157,081	88,093	33,280	632,763
73	Belle River/Range Road	2023	Fuel Supply	Combustible Dust	Fuel Supply Dust Collector 3TH-9	33,525	19,747	(3,696)	259,410	(31,952)	17,626
74	Greenwood Energy Center	2023	1	Safety	Unit 1 LP Turbine Rotor & Blades	64,904	33,258	1,710,791	1,033,831	119,026	84,148
75	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 Waterwall Tubes	1,789,066	2,554,599	4,426,430	3,796,794	2,076,894	219,868
76	Monroe without Large Enviro.	2023	1	Safety	Unit 1 LPA & LPB Turbine Rotor and Blades	512,858	2,672,590	5,125,815	1,224,167	892,898	514,830
77	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 Reheat Outlet Pendants	583,658	970,724	1,820,217	1,453,217	1,341,192	(889,760)
78	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 Expansion Joints	125,888	1,900,421	1,513,564	1,681,700	115,016	(13,584)
79	Monroe without Large Enviro.	2023	1	Safety	Unit 1 Coal Mill Primary Air Duct & Damper	593,816	207,132	1,212,937	1,533,499	592,981	54,161
80	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 HP Turbine Blades	35,802	1,322,199	1,207,568	826,635	665,761	388,686
81	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 IP Turbine Blades	65,940	984,296	1,389,980	1,278,216	657,745	205,119
82	Monroe without Large Enviro.	2023	1	Minor Environmental	Unit 1 SCR Catalyst Layers 1, 2, & 4	182,679	622,445	1,112,805	676,691	610,787	50,307
83	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 IP Turbine Rotor	-	-	-	-	-	1,240,326
84	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 Economizer Tubes	167,607	744,499	604,023	701,542	222,313	17,806
85	Monroe without Large Enviro.	2023	1	Safety	Unit 1 Reheat Stop Valves	440,739	187,171	426,117	950,863	401,015	63,631
86	Monroe without Large Enviro.	2023	1	Minor Environmental	Unit 1 SCR Inlet & Outlet Dampers	4,221	92,425	773,492	590,320	19,467	940
87	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 Air Heater Hot and Cold End Baskets	15,302	162,952	395,236	811,338	47,658	(1,368)
88	Monroe without Large Enviro.	2023	1	Safety	Unit 1 Main Turbine Control Valves	125,254	231,975	652,258	541,612	(165,503)	(28,158)
89	Monroe without Large Enviro.	2023	1	Safety	Unit 1 Main Steam Stop Valve	170,207	166,228	676,411	159,019	73,781	21,900
90	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 Coal Mill 1-3 Silo	1,850	65,554	4,824	842	127,340	931,198
91	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 Turning Gear & Bull Gear	338,367	655,075	163,402	(19,092)	25,611	1,001
92	Monroe without Large Enviro.	2023	1	Minor Environmental	Unit 1 1st & 2nd Stage FGD Mist Eliminators	91,266	865,733	71,336	55,543	6,396	8,634
93	Monroe without Large Enviro.	2023	1	Minor Environmental	Unit 1 FGD Absorber Inlet Expansion Joint	908	492,033	247,599	296,112	22,776	(3,573)
94	Monroe without Large Enviro.	2023	1	Minor Environmental	Unit 1 North & South FGD Booster Fans & Hubs	99,135	11,951	881,708	39,226	105	(81,113)
95	Monroe without Large Enviro.	2023	2	Reliability	Unit 2 Air Heater Cold End Baskets	-	-	-	-	-	-
96	Monroe without Large Enviro.	2023	3	Reliability	Unit 3 Air Heater Cold End Baskets	-	-	-	-	-	536
97	Monroe without Large Enviro.	2023	3	Minor Environmental	Unit 3 SCR Catalyst	1,562	1,601	478,663	969,269	32,184	(3,768)
98	Monroe without Large Enviro.	2023	3	Reliability	Unit 3 Expansion Joints	4,823	303,636	18,121	5,052	3,822	306,295
99	Monroe without Large Enviro.	2023	3	Safety	Unit 3 Coal Mill Primary Air Duct & Damper	92,139	9,250	8,725	12,345	5,077	33,638
100	Monroe without Large Enviro.	2023	3	Reliability	Unit 3 Coal Mill 3-6 Overhaul	-	-	-	-	-	-
101	Monroe without Large Enviro.	2023	4	Safety	Unit 4 LPA & LPB Turbine Rotor and Blades	-	-	6,420	31,293	120,637	124,352
102	Monroe without Large Enviro.	2023	4	Minor Environmental	Unit 4 SCR Catalyst Layer 2	3,652	1,322	8,923	2,422	5,374	271,703
103	Monroe without Large Enviro.	2023	4	Reliability	Unit 4 South Boiler Feed Pump Turbine Condenser	-	-	-	-	6,742	14,698
104	Monroe without Large Enviro.	2023	4	Minor Environmental	Unit 4 SCR Catalyst Layers 1, 3, & 4	-	-	-	-	-	-
105	Monroe without Large Enviro.	2023	4	Reliability	Unit 4 Coal Mill 4-1 Silo	-	-	-	-	-	-
106	Monroe without Large Enviro.	2023	Common	Reliability	Main Unit Transformer	-	-	34,045	33,555	44,226	33,461
107	Monroe without Large Enviro.	2023	Common	Minor Environmental	Underground Storage Tank 389	6,469	30,152	14,414	38,113	91,138	64,496
108	Monroe without Large Enviro.	2023	Fuel Supply	Minor Environmental	Fuel Supply Coal Pile Runoff Oil Waste Water System	23,413	49,519	1,285,369	80,130	50,077	394,954
109	Monroe without Large Enviro.	2023	Fuel Supply	Safety	Fuel Supply Tripper Gallery B Infrastructure	5,179	3,738	4,266	-	3,484	17,217
110	Monroe without Large Enviro.	2023	Fuel Supply	Combustible Dust	Fuel Supply CV-C4 to CV-C5 & CV-CV5A Transfer Chute	2,530	192,592	17,390	6,213	387,343	232,458
111	Monroe without Large Enviro.	2023	Fuel Supply	Combustible Dust	Fuel Supply CV-04 Transfer Chute	778,267	109,853	(33,119)	16,276	16,508	18,365
112	Monroe without Large Enviro.	2023	Fuel Supply	Safety	Fuel Supply Tripper Gallery C Infrastructure	-	-	-	-	624	20,729
113	Monroe without Large Enviro.	2023	Fuel Supply	Combustible Dust	Fuel Supply CV-19 to CV-10 Transfer Chute	-	101,491	2,475	15,069	15,757	6,035
114	Peakers	2023	Belle River	Reliability	Belle River 12-2 Peaker Major Overhaul	2,794,997	876,899	457,913	1,197,032	137,986	9,119
115	Peakers	2023	Belle River	Reliability	Belle River 13-1 Peaker Modified Hot Gas Path Overhaul	-	-	-	-	-	-
116	Peakers	2023	Belle River	Reliability	Belle River 12-2 Peaker Generator Field	69,968	198,413	756,048	311,095	69,967	(6,747)
117	Peakers	2023	Greenwood	Reliability	Greenwood 11-1 Peaker Major Overhaul	-	-	-	-	-	-
118	Peakers	2023	Northeast	Reliability	Northeast 13-2 Peaker Generator Field	7,570	1,463,430	88,821	30,834	7,578	12,862
119	Peakers	2023	Renaissance	Reliability	Renaissance Unit 4 Peaker Generator Stator & Rotor	3,666,806	1,874,088	549,144	2,086,017	156,952	69,893
120	Peakers	2023	Renaissance	Reliability	Renaissance Unit 3 Peaker Major Overhaul	331,579	1,443,429	354,305	4,347,347	445,443	114,605
121	Peakers	2023	Renaissance	Reliability	Renaissance Unit 2 Peaker Modified Hot Gas Path Overhaul	-	-	-	-	-	-
122	Peakers	2023	Renaissance	Minor Environmental	Renaissance Unit 2 Peaker Exhaust Silencers	4,567	513,915	597,896	1,123,110	42,278	12,441
123	Peakers	2023	Renaissance	Reliability	Renaissance Unit 3 Peaker Exhaust Cylinder & Manifold	88,390	425,193	102,281	1,033,741	73,773	45,916
124	Peakers	2023	Renaissance	Minor Environmental	Renaissance Unit 4 Peaker Exhaust Silencers	30,095	1,138,196	505,275	14,109	2,495	888
125	Peakers	2023	Renaissance	Reliability	Renaissance Peakers Main Unit Transformer	35,144	11,397	11,397	11,601	11,398	11,398
126	Trenton Channel	2023	Sibley	Minor Environmental	Sibley Quarry Capping Section 1A	102,380	72,955	94,671	245,077	219,376	603,971
	Monroe without Large Enviro.	2023	2	Minor Environmental	Unit 2 SCR Catalyst L3 Replacement - 2024	-	-	-	-	-	1,429
	Monroe without Large Enviro.	2023	Common	Reliability	Inlet Canal Skimmer	-	-	-	206,737	6,326	-
	Peakers	2023	Greenwood	Minor Environmental	Greenwood 11-1, 11-2 & 12-1 Exhaust Silencer Baffle Replacements	235	6,827	1,812	5,180	6,918	179,910

Michigan Public Service Commission  
 DTE Electric Company  
 Actual Capital Expenditures  
 Years 2022 to 2023  
 Routine Maintenance Projects greater than \$1M

Case No.: U-21534  
 Requestor: Staff  
 Question No.: STDE-2.1a  
 Respondent: M. Guillaumin

Line No.	(a) Facility	(b) Calendar Year	(c) Unit	(d) High Level Breakdown	(f) Description	Actual	Actual	Actual	Actual	Actual	Actual	Jan-Dec 2023
						Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	
68	Belle River/Range Road	2023	2	Safety	Unit 2 LP Turbine Rotor & Blades	2,636,306	(58,235)	17,841	106,877	75,799	1,996,573	5,858,155
69	Belle River/Range Road	2023	2	Reliability	Unit 2 Exciter	14,473	136,672	147,947	900,165	72,754	349,563	2,394,659
70	Belle River/Range Road	2023	2	Reliability	Unit 2 Waterwall Tubes	12,399	26,812	56,065	230,421	365,314	754,229	1,701,958
71	Belle River/Range Road	2023	2	Safety	Unit 2 IP Turbine Valves	123,241	93,544	372,803	55,198	55,647	26,878	809,839
72	Belle River/Range Road	2023	Fuel Supply	Infrastructure	Fuel Supply & Common Systems Separation from St. Clair Power Plant	557,823	(16,564)	15,688	19,176	56,013	(3,494)	3,073,284
73	Belle River/Range Road	2023	Fuel Supply	Combustible Dust	Fuel Supply Dust Collector 3TH-9	320,543	373,324	297,948	241,383	175,307	40,822	1,743,984
74	Greenwood Energy Center	2023	1	Safety	Unit 1 LP Turbine Rotor & Blades	236,216	65,736	102,867	102,045	2,002,106	283,671	5,838,599
75	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 Waterwall Tubes	59,177	104,436	8,576	853	3,726	-	15,040,419
76	Monroe without Large Enviro.	2023	1	Safety	Unit 1 LPA & LPB Turbine Rotor and Blades	(39,082)	(463,476)	15,718	(13,604)	-	5,866	10,448,580
77	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 Reheat Outlet Pendants	35,652	69,569	18,359	821	-	-	5,403,649
78	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 Expansion Joints	1,144	-	-	-	-	-	5,324,148
79	Monroe without Large Enviro.	2023	1	Safety	Unit 1 Coal Mill Primary Air Duct & Damper	11,041	(213)	-	-	-	-	4,205,353
80	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 HP Turbine Blades	(251,050)	(335,402)	9,173	(13,454)	(2,572)	-	3,853,346
81	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 IP Turbine Blades	(350,958)	(421,071)	(63,873)	-	-	-	3,745,394
82	Monroe without Large Enviro.	2023	1	Minor Environmental	Unit 1 SCR Catalyst Layers 1, 2, & 4	13,415	43,371	-	-	-	-	3,312,499
83	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 IP Turbine Rotor	91,139	941,601	35,955	17,645	226,134	22,141	2,574,941
84	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 Economizer Tubes	(139)	-	-	-	-	-	2,457,650
85	Monroe without Large Enviro.	2023	1	Safety	Unit 1 Reheat Stop Valves	242	(75,308)	-	-	-	-	2,394,471
86	Monroe without Large Enviro.	2023	1	Minor Environmental	Unit 1 SCR Inlet & Outlet Dampers	-	-	-	-	-	-	1,480,864
87	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 Air Heater Hot and Cold End Baskets	(201)	-	-	-	-	-	1,430,916
88	Monroe without Large Enviro.	2023	1	Safety	Unit 1 Main Turbine Control Valves	(22,071)	-	-	(13,956)	-	-	1,321,411
89	Monroe without Large Enviro.	2023	1	Safety	Unit 1 Main Steam Stop Valve	(7,015)	973	-	13	-	-	1,261,517
90	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 Coal Mill 1-3 Silo	61,774	-	(11,479)	-	-	-	1,181,903
91	Monroe without Large Enviro.	2023	1	Reliability	Unit 1 Turning Gear & Bull Gear	(4,735)	-	-	(275)	-	196	1,159,550
92	Monroe without Large Enviro.	2023	1	Minor Environmental	Unit 1 1st & 2nd Stage FGD Mist Eliminators	(4,523)	(496)	9,486	-	-	-	1,103,375
93	Monroe without Large Enviro.	2023	1	Minor Environmental	Unit 1 FGD Absorber Inlet Expansion Joint	17,363	37	-	-	-	-	1,072,714
94	Monroe without Large Enviro.	2023	1	Minor Environmental	Unit 1 North & South FGD Booster Fans & Hubs	104,414	-	-	-	-	-	1,055,427
95	Monroe without Large Enviro.	2023	2	Reliability	Unit 2 Air Heater Cold End Baskets	-	-	1,049	232,016	16,507	924,826	1,174,397
96	Monroe without Large Enviro.	2023	3	Reliability	Unit 3 Air Heater Cold End Baskets	236,926	933,596	952,663	86,611	24,066	12,065	2,246,462
97	Monroe without Large Enviro.	2023	3	Minor Environmental	Unit 3 SCR Catalyst	826	461	6,428	259	3,590,252	5,077,996	2,299,993
98	Monroe without Large Enviro.	2023	3	Reliability	Unit 3 Expansion Joints	25,723	4,665	264,728	(39,413)	186,320	272,919	1,356,692
99	Monroe without Large Enviro.	2023	3	Safety	Unit 3 Coal Mill Primary Air Duct & Damper	12,356	302,209	12,614	498,408	39,202	7,591	1,033,555
100	Monroe without Large Enviro.	2023	3	Reliability	Unit 3 Coal Mill 3-6 Overhaul	-	-	246	181,424	1,060,385	57,759	1,299,813
101	Monroe without Large Enviro.	2023	4	Safety	Unit 4 LPA & LPB Turbine Rotor and Blades	9,088	(4,951)	1,717,923	2,146,820	167,385	19,417	4,338,382
102	Monroe without Large Enviro.	2023	4	Minor Environmental	Unit 4 SCR Catalyst Layer 2	509,910	81,955	11,282	166,636	733,384	83,236	1,879,799
103	Monroe without Large Enviro.	2023	4	Reliability	Unit 4 South Boiler Feed Pump Turbine Condenser	2,470	23,970	225,192	165,573	981,253	8,251	1,428,149
104	Monroe without Large Enviro.	2023	4	Minor Environmental	Unit 4 SCR Catalyst Layers 1, 3, & 4	-	-	-	7,698	7,827	3,579,288	3,594,813
105	Monroe without Large Enviro.	2023	4	Reliability	Unit 4 Coal Mill 4-1 Silo	-	-	15,423	146,776	900,967	61,211	1,124,377
106	Monroe without Large Enviro.	2023	Common	Reliability	Main Unit Transformer	132,653	2,273,125	290,275	104,584	21,156	8,810	2,975,889
107	Monroe without Large Enviro.	2023	Common	Minor Environmental	Underground Storage Tank 389	9,444	92,878	348,618	369,342	379,253	426,600	1,870,916
108	Monroe without Large Enviro.	2023	Fuel Supply	Minor Environmental	Fuel Supply Coal Pile Runoff Oil Waste Water System	173,763	543,247	203,762	885,564	95,329	(68,085)	3,717,043
109	Monroe without Large Enviro.	2023	Fuel Supply	Safety	Fuel Supply Tripper Gallery B Infrastructure	801,025	857,117	1,180,508	109,338	13,055	3,985	2,998,911
110	Monroe without Large Enviro.	2023	Fuel Supply	Combustible Dust	Fuel Supply CV-C4 to CV-C5 & CV-CV5A Transfer Chute	24,223	14,945	11,748	115,908	1,073,223	81,571	2,160,143
111	Monroe without Large Enviro.	2023	Fuel Supply	Combustible Dust	Fuel Supply Tr-04 Transfer Chute	109,701	118,284	742,099	75,599	10,028	4,186	1,966,027
112	Monroe without Large Enviro.	2023	Fuel Supply	Safety	Fuel Supply Tripper Gallery C Infrastructure	8,313	929	4,580	8,605	1,541,901	83,460	1,669,141
113	Monroe without Large Enviro.	2023	Fuel Supply	Combustible Dust	Fuel Supply CV-19 to CV-10 Transfer Chute	8,523	213,779	171,845	(19,019)	115,797	555,603	1,187,357
114	Peakers	2023	Belle River	Reliability	Belle River 12-2 Peaker Major Overhaul	(65,226)	-	-	-	-	-	5,408,718
115	Peakers	2023	Belle River	Reliability	Belle River 13-1 Peaker Modified Hot Gas Path Overhaul	-	-	-	-	409,478	809,235	1,218,712
116	Peakers	2023	Belle River	Reliability	Belle River 12-2 Peaker Generator Field	(7,262)	-	-	-	-	-	1,391,482
117	Peakers	2023	Greenwood	Reliability	Greenwood 11-1 Peaker Major Overhaul	-	-	-	269	-	1,348,854	1,349,123
118	Peakers	2023	Northeast	Reliability	Northeast 13-2 Peaker Generator Field	(303)	-	-	-	-	-	1,610,791
119	Peakers	2023	Renaissance	Reliability	Renaissance Unit 4 Peaker Generator Stator & Rotor	164,871	68,925	75,826	19,934	22,678	201,128	8,956,261
120	Peakers	2023	Renaissance	Reliability	Renaissance Unit 3 Peaker Major Overhaul	(22,454)	82,538	9,550	2,155	(0)	-	7,108,498
121	Peakers	2023	Renaissance	Reliability	Renaissance Unit 2 Peaker Modified Hot Gas Path Overhaul	-	-	-	-	10	3,869,907	3,869,917
122	Peakers	2023	Renaissance	Minor Environmental	Renaissance Unit 2 Peaker Exhaust Silencers	384	-	-	-	-	-	2,294,591
123	Peakers	2023	Renaissance	Reliability	Renaissance Unit 3 Peaker Exhaust Cylinder & Manifold	(17,765)	(21,286)	62,995	22,098	-	-	1,815,336
124	Peakers	2023	Renaissance	Minor Environmental	Renaissance Unit 4 Peaker Exhaust Silencers	202	-	-	3,246	3,496	-	1,698,001
125	Peakers	2023	Renaissance	Reliability	Renaissance Peakers Main Unit Transformer	11,512	18,691	38,158	103,733	821,150	97,439	1,183,017
126	Trenton Channel	2023	Sibley	Minor Environmental	Sibley Quarry Capping Section 1A	475,646	412,203	1,156,280	2,315,967	1,618,483	1,745,305	9,062,316
	Monroe without Large Enviro.	2023	2	Minor Environmental	Unit 2 SCR Catalyst L3 Replacement - 2024	5,441	9,290	4,976	166,783	15,790	964,367	1,168,077
	Monroe without Large Enviro.	2023	Common	Reliability	Inlet Canal Skimmer	209,156	528,252	27,990	4,710	-	27,463	1,010,634
	Peakers	2023	Greenwood	Minor Environmental	Greenwood 11-1, 11-2 & 12-1 Exhaust Silencer Baffle Replacements	513,362	38,168	2,716	3,602	5,152	500,041	1,263,924

Total of Lines 68-126 that match case exhibit 181,315,232

A-12 B5.1 p. 5 Line 127 180,090,471

Increase due to Actual spending for 2023 1,224,761

Michigan Public Service Commission  
DTE Electric Company  
Actual Capital Expenditures  
Year 2024  
Routine Maintenance Projects greater than \$1M

Case No.: U-21534  
Requestor: Staff  
Question No.: STDE-2.1b  
Respondent: M. Guillaumin

Case No.: U-21534  
Exhibit No.: S-16.2  
Witness: Lisa M. Kindschy  
Date: July 26, 2024  
Page: 3 of 4

Line No.	(a) Facility	(b) Calendar Year	(c) Unit	(d) High Level Breakdown	(f) Description	Actual	Actual	Actual	Actual
						Jan-24	Feb-24	Mar-24	Apr-24
128	Belle River/Range Road	2024	1	Safety	Unit 1 480 Volt Breakers	2,195	2,126	413,151	(15,327)
129	Belle River/Range Road	2024	1	Safety	Unit 1 Medium Voltage Breakers	721	970	4,792	1,182
130	Belle River/Range Road	2024	1	Reliability	Unit 1 East Boiler Feed Pump Turbine Blades & Rotor	(29)	1	213,543	(30,857)
131	Belle River/Range Road	2024	1	Reliability	Unit 1 White Coal Mill	(36,427)	(2,022)	-	133,843
132	Belle River/Range Road	2024	2	Safety	Unit 2 LP Turbine Rotor & Blades	2,760,967	1,771,558	(3,646)	(119,287)
133	Belle River/Range Road	2024	2	Reliability	Unit 2 Waterwall Tubes	1,340,829	1,570,807	(76,853)	116,074
134	Belle River/Range Road	2024	2	Reliability	Unit 2 Exciter	977,474	571,060	422,685	(42,494)
135	Belle River/Range Road	2024	2	Safety	Unit 2 IP Turbine Valves	1,798,590	939,851	(57,734)	(155,887)
136	Belle River/Range Road	2024	2	Safety	Unit 2 Turbine Stop Valve Actuators	574,892	499,451	740,580	13,910
137	Belle River/Range Road	2024	2	Safety	Unit 2 480 Voltage Breakers	377	3,796	856	399,356
138	Belle River/Range Road	2024	2	Safety	Unit 2 Medium Voltage Breakers	377	(21,064)	25,554	964
139	Belle River/Range Road	2024	2	Reliability	Unit 2 Primary Superheat Tubes	462,220	716,587	(19,245)	(17,207)
140	Belle River/Range Road	2024	Common	Safety	Unit 1 & 2 Common Systems 480 Volt Breakers	141	(115)	6,438	529
141	Belle River/Range Road	2024	Common	Safety	Unit 1 & 2 Common Systems Medium Voltage Breakers	513	1,003	4,343	352
142	Belle River/Range Road	2024	Common	Minor Environmental	Underground Storage Tanks 387 and 388	(1,178)	27,270	21,766	3,215
143	Belle River/Range Road	2024	Common	Minor Environmental	Underground Storage Tank 393	(1,951)	30,996	20,576	23,696
144	Blue Water Energy Center	2024	Common	Infrastructure	Circulating Water Pumps Enclosure	22,576	51,853	46,759	7,810
145	Blue Water Energy Center	2024	Common	Safety	Conference Room Building	25,913	11,412	26,925	520,343
146	Blue Water Energy Center	2024	Common	Reliability	Control Server	-	-	-	-
147	Blue Water Energy Center	2024	ST1	Reliability	STG Transformer	-	-	-	-
148	Greenwood Energy Center	2024	1	Safety	Unit 1 LP Turbine Rotor & Blades	238,965	109,506	2,310,248	344,303
149	Greenwood Energy Center	2024	1	Reliability	Unit 1 Feedwater Heater #6	183,494	32,562	193,970	34,373
150	Greenwood Energy Center	2024	1	Reliability	Unit 1 Feedwater Heater #3	137,009	23,237	146,294	35,463
151	Monroe without Large Enviro.	2024	1	Minor Environmental	Unit 1 SCR Catalyst Layer 3	-	-	6,053	2,869
152	Monroe without Large Enviro.	2024	1	Reliability	Unit 1 IP Turbine Rotor	11,578	840,700	60,841	15,589
153	Monroe without Large Enviro.	2024	2	Safety	Unit 2 LPA & LPB Turbine Rotor and Blades	-	208,518	123,277	3,940,817
154	Monroe without Large Enviro.	2024	2	Reliability	Unit 2 Air Heater Cold End Baskets	33,485	942,059	63,078	13,361
155	Monroe without Large Enviro.	2024	2	Minor Environmental	Unit 2 SCR Catalyst	35,579	98	6,472	6,583
156	Monroe without Large Enviro.	2024	2	Reliability	Unit 2 Coal Mill Feeder Controls	10,444	6,101	4,090	376,560
157	Monroe without Large Enviro.	2024	3	Reliability	Unit 3 Waterwall Tubes	33,016	153,450	2,296,932	7,621,327
158	Monroe without Large Enviro.	2024	3	Minor Environmental	Unit 3 SCR Catalyst	165,179	197,117	562,359	1,074,494
159	Monroe without Large Enviro.	2024	3	Safety	Unit 3 Coal Mill Primary Air Duct & Damper	634,469	50,210	1,378,104	1,244,086
160	Monroe without Large Enviro.	2024	3	Safety	Unit 3 Turbine Valves	181,208	620,241	953,920	2,114,992
161	Monroe without Large Enviro.	2024	3	Reliability	Unit 3 IP Turbine Blades	82,220	153,731	1,295,776	1,596,068
162	Monroe without Large Enviro.	2024	3	Reliability	Unit 3 Expansion Joints	29,242	203,859	1,118,563	755,211
163	Monroe without Large Enviro.	2024	3	Reliability	Unit 3 Reheat Outlet Pendants	104,459	18,019	336,634	1,400,895
164	Monroe without Large Enviro.	2024	3	Reliability	Unit 3 Air Heater Cold End Baskets	297,316	198,377	704,435	822,080
165	Monroe without Large Enviro.	2024	3	Reliability	Unit 3 Horizontal Reheater Tubes	22,469	187,257	657,172	1,144,605
166	Monroe without Large Enviro.	2024	3	Reliability	Unit 3 DCS & Control Room	128,368	116,679	307,315	338,949
167	Monroe without Large Enviro.	2024	3	Reliability	Unit 3 Coal Mill Classifiers	4,196	398,501	330,171	505,152
168	Monroe without Large Enviro.	2024	3	Reliability	Unit 3 Coal Mill 3-7 Silo	37,304	142,111	562,133	418,045
169	Monroe without Large Enviro.	2024	4	Safety	Unit 4 LPA & LPB Turbine Rotor and Blades	1,785,036	119,076	32,338	1,036,210
170	Monroe without Large Enviro.	2024	4	Minor Environmental	Unit 4 SCR Catalyst	107,470	2,761	1,693	1,331
171	Monroe without Large Enviro.	2024	4	Safety	Unit 4 Coal Mill Primary Air Duct & Damper	5,128	56,497	9,228	6,339
172	Monroe without Large Enviro.	2024	4	Reliability	Unit 4 Expansion Joints	327,132	21,159	3,481	3,437
173	Monroe without Large Enviro.	2024	4	Safety	Unit 4 Turbine Valves	-	-	-	-

(a)	(b)	(c)	(d)	(f)	Actual Jan-24	Actual Feb-24	Actual Mar-24	Actual Apr-24		
Line No.	Facility	Calendar Year	Unit	High Level Breakdown Description						
174	Monroe without Large Enviro.	2024	Common	Minor Environmental	Underground Storage Tank 389	46,820	333,929	46,950	546,136	
175	Monroe without Large Enviro.	2024	Fuel Supply	Safety	Fuel Supply Tripper Gallery C Infrastructure	6,058	7,292	6,391	6,664	
176	Monroe without Large Enviro.	2024	Fuel Supply	Combustible Dust	Fuel Supply CV-C2 Loading Zone Transfer Chutes	948	1,333	(2,249)	153,738	
177	Monroe without Large Enviro.	2024	Fuel Supply	Minor Environmental	Fuel Supply Coal Pile Runoff Oil Waste Water System	81,271	63,611	83,427	24,348	
178	Peakers	2024	Belle River	Reliability	Belle River 13-1 Peaker Combustion Overhaul	25,183	-	-	-	
179	Peakers	2024	DTE	Reliability	Blackstart Peaker Unit 1 Starting System	1,563	1,410	3,377	1,138	
180	Peakers	2024	Greenwood	Reliability	Greenwood 11-1 Peaker Major Overhaul	138,094	10,600	72,652	37,421	
181	Peakers	2024	Greenwood	Minor Environmental	Greenwood 11-1, 11-2 & 12-1 Peakers Exhaust Silencers	19,624	7,007	225,940	702,366	
182	Peakers	2024	Greenwood	Reliability	Greenwood 11-1 Peaker Generator Field	2,878	13	13	13	
183	Peakers	2024	Renaissance	Reliability	Renaissance Unit 1 Peaker Generator Stator & Rotor	115,487	4,638	3,340	61,353	
184	Peakers	2024	Renaissance	Reliability	Renaissance Unit 3 Peaker Generator Stator Rewind & Rotor	25,438	3,360	-	-	
185	Peakers	2024	Renaissance	Reliability	Renaissance Unit 1 Peaker Main Unit Transformer	14,732	8,501	46,080	17,060	
186	Trenton Channel	2024	Sibley	Minor Environmental	Sibley Quarry Capping Section 1A	412,099	287,340	203,097	788,144	
Sum of lines 128-186						13,413,156	11,706,397	15,944,085	28,031,737	Jan-Apr 2024 69,095,375
Projected Monthly Total Amounts for A-12 B5.1 page 6 from Part III file "U-21534 FG Att 9.7"						16,186,281	14,908,104	26,151,651	34,407,592	91,653,628
Difference						(2,773,125)	(3,201,706)	(10,207,567)	(6,375,855)	<b>(22,558,252)</b>

AACE International Recommended Practice No. 18R-97

**COST ESTIMATE CLASSIFICATION SYSTEM – AS APPLIED IN  
ENGINEERING, PROCUREMENT, AND CONSTRUCTION FOR  
THE PROCESS INDUSTRIES**

TCM Framework: 7.3 – Cost Estimating and Budgeting

**Acknowledgments:**

Peter Christensen, CCE (Author)  
Larry R. Dysert, CCC (Author)  
Jennifer Bates, CCE  
Dorothy J. Burton  
Robert C. Creese, PE CCE  
John K. Hollmann, PE CCE

Kenneth K. Humphreys, PE CCE  
Donald F. McDonald, Jr. PE CCE  
C. Arthur Miller  
Bernard A. Pietlock, CCC  
Wesley R. Querns, CCE  
Don L. Short, II

# COST ESTIMATE CLASSIFICATION SYSTEM – AS APPLIED IN ENGINEERING, PROCUREMENT, AND CONSTRUCTION FOR THE PROCESS INDUSTRIES

TCM Framework: 7.3 – Cost Estimating and Budgeting



February 2, 2005

## PURPOSE

As a recommended practice of AACE International, the Cost Estimate Classification System provides guidelines for applying the general principles of estimate classification to project cost estimates (i.e., cost estimates that are used to evaluate, approve, and/or fund projects). The Cost Estimate Classification System maps the phases and stages of project cost estimating together with a generic maturity and quality matrix, which can be applied across a wide variety of industries.

This addendum to the generic recommended practice provides guidelines for applying the principles of estimate classification specifically to project estimates for engineering, procurement, and construction (EPC) work for the process industries. This addendum supplements the generic recommended practice (17R-97) by providing:

- a section that further defines classification concepts as they apply to the process industries;
- charts that compare existing estimate classification practices in the process industry; and
- a chart that maps the extent and maturity of estimate input information (project definition deliverables) against the class of estimate.

As with the generic standard, an intent of this addendum is to improve communications among all of the stakeholders involved with preparing, evaluating, and using project cost estimates specifically for the process industries.

It is understood that each enterprise may have its own project and estimating processes and terminology, and may classify estimates in particular ways. This guideline provides a generic and generally acceptable classification system for process industries that can be used as a basis to compare against. It is hoped that this addendum will allow each user to better assess, define, and communicate their own processes and standards in the light of generally-accepted cost engineering practice.

## INTRODUCTION

For the purposes of this addendum, the term process industries is assumed to include firms involved with the manufacturing and production of chemicals, petrochemicals, and hydrocarbon processing. The common thread among these industries (for the purpose of estimate classification) is their reliance on process flow diagrams (PFDs) and piping and instrument diagrams (P&IDs) as primary scope defining documents. These documents are key deliverables in determining the level of project definition, and thus the extent and maturity of estimate input information.

Estimates for process facilities center on mechanical and chemical process equipment, and they have significant amounts of piping, instrumentation, and process controls involved. As such, this addendum may apply to portions of other industries, such as pharmaceutical, utility, metallurgical, converting, and similar industries. Specific addendums addressing these industries may be developed over time.

This addendum specifically does not address cost estimate classification in nonprocess industries such as commercial building construction, environmental remediation, transportation infrastructure, “dry” processes such as assembly and manufacturing, “soft asset” production such as software development, and similar industries. It also does not specifically address estimates for the exploration, production, or transportation of mining or hydrocarbon materials, although it may apply to some of the intermediate processing steps in these systems.

The cost estimates covered by this addendum are for engineering, procurement, and construction (EPC) work only. It does not cover estimates for the products manufactured by the process facilities, or for research and development work in support of the process industries. This guideline does not cover the



February 2, 2005

significant building construction that may be a part of process plants. Building construction will be covered in a separate addendum.

This guideline reflects generally-accepted cost engineering practices. This addendum was based upon the practices of a wide range of companies in the process industries from around the world, as well as published references and standards. Company and public standards were solicited and reviewed by the AACE International Cost Estimating Committee. The practices were found to have significant commonalities that are conveyed in this addendum.

### COST ESTIMATE CLASSIFICATION MATRIX FOR THE PROCESS INDUSTRIES

The five estimate classes are presented in figure 1 in relationship to the identified characteristics. Only the level of project definition determines the estimate class. The other four characteristics are secondary characteristics that are generally correlated with the level of project definition, as discussed in the generic standard. The characteristics are typical for the process industries but may vary from application to application.

This matrix and guideline provide an estimate classification system that is specific to the process industries. Refer to the generic standard for a general matrix that is non-industry specific, or to other addendums for guidelines that will provide more detailed information for application in other specific industries. These will typically provide additional information, such as input deliverable checklists to allow meaningful categorization in those particular industries.

ESTIMATE CLASS	Primary Characteristic	Secondary Characteristic			
	LEVEL OF PROJECT DEFINITION Expressed as % of complete definition	END USAGE Typical purpose of estimate	METHODOLOGY Typical estimating method	EXPECTED ACCURACY RANGE Typical variation in low and high ranges [a]	PREPARATION EFFORT Typical degree of effort relative to least cost index of 1 [b]
Class 5	0% to 2%	Concept Screening	Capacity Factored, Parametric Models, Judgment, or Analogy	L: -20% to -50% H: +30% to +100%	1
Class 4	1% to 15%	Study or Feasibility	Equipment Factored or Parametric Models	L: -15% to -30% H: +20% to +50%	2 to 4
Class 3	10% to 40%	Budget, Authorization, or Control	Semi-Detailed Unit Costs with Assembly Level Line Items	L: -10% to -20% H: +10% to +30%	3 to 10
Class 2	30% to 70%	Control or Bid/Tender	Detailed Unit Cost with Forced Detailed Take-Off	L: -5% to -15% H: +5% to +20%	4 to 20
Class 1	50% to 100%	Check Estimate or Bid/Tender	Detailed Unit Cost with Detailed Take-Off	L: -3% to -10% H: +3% to +15%	5 to 100

- Notes:
- [a] The state of process technology and availability of applicable reference cost data affect the range markedly. The +/- value represents typical percentage variation of actual costs from the cost estimate after application of contingency (typically at a 50% level of confidence) for given scope.
  - [b] If the range index value of "1" represents 0.005% of project costs, then an index value of 100 represents 0.5%. Estimate preparation effort is highly dependent upon the size of the project and the quality of estimating data and tools.

**Figure 1. – Cost Estimate Classification Matrix for Process Industries**

**CHARACTERISTICS OF THE ESTIMATE CLASSES**

The following charts (figures 2a through 2e) provide detailed descriptions of the five estimate classifications as applied in the process industries. They are presented in the order of least-defined estimates to the most-defined estimates. These descriptions include brief discussions of each of the estimate characteristics that define an estimate class.

For each chart, the following information is provided:

- **Description:** a short description of the class of estimate, including a brief listing of the expected estimate inputs based on the level of project definition.
- **Level of Project Definition Required:** expressed as a percent of full definition. For the process industries, this correlates with the percent of engineering and design complete.
- **End Usage:** a short discussion of the possible end usage of this class of estimate.
- **Estimating Methods Used:** a listing of the possible estimating methods that may be employed to develop an estimate of this class.
- **Expected Accuracy Range:** typical variation in low and high ranges after the application of contingency (determined at a 50% level of confidence). Typically, this results in a 90% confidence that the actual cost will fall within the bounds of the low and high ranges.
- **Effort to Prepare:** this section provides a typical level of effort (in hours) to produce a complete estimate for a US\$20,000,000 plant. Estimate preparation effort is highly dependent on project size, project complexity, estimator skills and knowledge, and on the availability of appropriate estimating cost data and tools.
- **ANSI Standard Reference (1989) Name:** this is a reference to the equivalent estimate class in the existing ANSI standards.
- **Alternate Estimate Names, Terms, Expressions, Synonyms:** this section provides other commonly used names that an estimate of this class might be known by. These alternate names are not endorsed by this Recommended Practice. The user is cautioned that an alternative name may not always be correlated with the class of estimate as identified in the chart.

<b>CLASS 5 ESTIMATE</b>	
<p><b>Description:</b>            Class 5 estimates are generally prepared based on very limited information, and subsequently have wide accuracy ranges. As such, some companies and organizations have elected to determine that due to the inherent inaccuracies, such estimates cannot be classified in a conventional and systemic manner. Class 5 estimates, due to the requirements of end use, may be prepared within a very limited amount of time and with little effort expended—sometimes requiring less than an hour to prepare. Often, little more than proposed plant type, location, and capacity are known at the time of estimate preparation.</p> <p><b>Level of Project Definition Required:</b>            0% to 2% of full project definition.</p> <p><b>End Usage:</b>            Class 5 estimates are prepared for any number of strategic business planning purposes, such as but not limited to market studies, assessment of initial viability, evaluation of alternate schemes, project screening, project location studies, evaluation of resource needs and budgeting, long-range capital planning, etc.</p>	<p><b>Estimating Methods Used:</b>            Class 5 estimates virtually always use stochastic estimating methods such as cost/capacity curves and factors, scale of operations factors, Lang factors, Hand factors, Chilton factors, Peters-Timmerhaus factors, Guthrie factors, and other parametric and modeling techniques.</p> <p><b>Expected Accuracy Range:</b>            Typical accuracy ranges for Class 5 estimates are - 20% to -50% on the low side, and +30% to +100% on the high side, depending on the technological complexity of the project, appropriate reference information, and the inclusion of an appropriate contingency determination. Ranges could exceed those shown in unusual circumstances.</p> <p><b>Effort to Prepare (for US\$20MM project):</b>            As little as 1 hour or less to perhaps more than 200 hours, depending on the project and the estimating methodology used.</p> <p><b>ANSI Standard Reference Z94.2-1989 Name:</b>            Order of magnitude estimate (typically -30% to +50%).</p> <p><b>Alternate Estimate Names, Terms, Expressions, Synonyms:</b>            Ratio, ballpark, blue sky, seat-of-pants, ROM, idea study, prospect estimate, concession license estimate, guesstimate, rule-of-thumb.</p>

Cost Estimate Classification System – As Applied in Engineering  
 Procurement, and Construction for the Process Industries



February 2, 2005

Figure 2a. – Class 5 Estimate

<b>CLASS 4 ESTIMATE</b>	
<p><b>Description:</b>            Class 4 estimates are generally prepared based on limited information and subsequently have fairly wide accuracy ranges. They are typically used for project screening, determination of feasibility, concept evaluation, and preliminary budget approval. Typically, engineering is from 1% to 15% complete, and would comprise at a minimum the following: plant capacity, block schematics, indicated layout, process flow diagrams (PFDs) for main process systems, and preliminary engineered process and utility equipment lists.</p> <p><b>Level of Project Definition Required:</b>            1% to 15% of full project definition.</p> <p><b>End Usage:</b>            Class 4 estimates are prepared for a number of purposes, such as but not limited to, detailed strategic planning, business development, project screening at more developed stages, alternative scheme analysis, confirmation of economic and/or technical feasibility, and preliminary budget approval or approval to proceed to next stage.</p>	<p><b>Estimating Methods Used:</b>            Class 4 estimates virtually always use stochastic estimating methods such as equipment factors, Lang factors, Hand factors, Chilton factors, Peters-Timmerhaus factors, Guthrie factors, the Miller method, gross unit costs/ratios, and other parametric and modeling techniques.</p> <p><b>Expected Accuracy Range:</b>            Typical accuracy ranges for Class 4 estimates are -15% to -30% on the low side, and +20% to +50% on the high side, depending on the technological complexity of the project, appropriate reference information, and the inclusion of an appropriate contingency determination. Ranges could exceed those shown in unusual circumstances.</p> <p><b>Effort to Prepare (for US\$20MM project):</b>            Typically, as little as 20 hours or less to perhaps more than 300 hours, depending on the project and the estimating methodology used.</p> <p><b>ANSI Standard Reference Z94.2-1989 Name:</b>            Budget estimate (typically -15% to + 30%).</p> <p><b>Alternate Estimate Names, Terms, Expressions, Synonyms:</b>            Screening, top-down, feasibility, authorization, factored, pre-design, pre-study.</p>

Figure 2b. – Class 4 Estimate

<b>CLASS 3 ESTIMATE</b>	
<p><b>Description:</b>            Class 3 estimates are generally prepared to form the basis for budget authorization, appropriation, and/or funding. As such, they typically form the initial control estimate against which all actual costs and resources will be monitored. Typically, engineering is from 10% to 40% complete, and would comprise at a minimum the following: process flow diagrams, utility flow diagrams, preliminary piping and instrument diagrams, plot plan, developed layout drawings, and essentially complete engineered process and utility equipment lists.</p> <p><b>Level of Project Definition Required:</b>            10% to 40% of full project definition.</p> <p><b>End Usage:</b>            Class 3 estimates are typically prepared to support full project funding requests, and become the first of the project phase “control estimates” against which all actual costs and resources will be monitored for variations to the budget. They are used as the project budget until replaced by more detailed estimates. In many owner organizations, a Class 3 estimate may be the last estimate required and could well form the only basis for cost/schedule control.</p>	<p><b>Estimating Methods Used:</b>            Class 3 estimates usually involve more deterministic estimating methods than stochastic methods. They usually involve a high degree of unit cost line items, although these may be at an assembly level of detail rather than individual components. Factoring and other stochastic methods may be used to estimate less-significant areas of the project.</p> <p><b>Expected Accuracy Range:</b>            Typical accuracy ranges for Class 3 estimates are -10% to -20% on the low side, and +10% to +30% on the high side, depending on the technological complexity of the project, appropriate reference information, and the inclusion of an appropriate contingency determination. Ranges could exceed those shown in unusual circumstances.</p> <p><b>Effort to Prepare (for US\$20MM project):</b>            Typically, as little as 150 hours or less to perhaps more than 1,500 hours, depending on the project and the estimating methodology used.</p> <p><b>ANSI Standard Reference Z94.2-1989 Name:</b>            Budget estimate (typically -15% to + 30%).</p> <p><b>Alternate Estimate Names, Terms, Expressions, Synonyms:</b>            Budget, scope, sanction, semi-detailed, authorization, preliminary control, concept study, development, basic engineering phase estimate, target estimate.</p>

Figure 2c. – Class 3 Estimate

Cost Estimate Classification System – As Applied in Engineering  
 Procurement, and Construction for the Process Industries



February 2, 2005

<b>CLASS 2 ESTIMATE</b>	
<p><b>Description:</b>            Class 2 estimates are generally prepared to form a detailed control baseline against which all project work is monitored in terms of cost and progress control. For contractors, this class of estimate is often used as the “bid” estimate to establish contract value. Typically, engineering is from 30% to 70% complete, and would comprise at a minimum the following: process flow diagrams, utility flow diagrams, piping and instrument diagrams, heat and material balances, final plot plan, final layout drawings, complete engineered process and utility equipment lists, single line diagrams for electrical, electrical equipment and motor schedules, vendor quotations, detailed project execution plans, resourcing and work force plans, etc.</p> <p><b>Level of Project Definition Required:</b>            30% to 70% of full project definition.</p> <p><b>End Usage:</b>            Class 2 estimates are typically prepared as the detailed control baseline against which all actual costs and resources will now be monitored for variations to the budget, and form a part of the change/variation control program.</p>	<p><b>Estimating Methods Used:</b>            Class 2 estimates always involve a high degree of deterministic estimating methods. Class 2 estimates are prepared in great detail, and often involve tens of thousands of unit cost line items. For those areas of the project still undefined, an assumed level of detail takeoff (forced detail) may be developed to use as line items in the estimate instead of relying on factoring methods.</p> <p><b>Expected Accuracy Range:</b>            Typical accuracy ranges for Class 2 estimates are -5% to -15% on the low side, and +5% to +20% on the high side, depending on the technological complexity of the project, appropriate reference information, and the inclusion of an appropriate contingency determination. Ranges could exceed those shown in unusual circumstances.</p> <p><b>Effort to Prepare (for US\$20MM project):</b>            Typically, as little as 300 hours or less to perhaps more than 3,000 hours, depending on the project and the estimating methodology used. Bid estimates typically require more effort than estimates used for funding or control purposes.</p> <p><b>ANSI Standard Reference Z94.2-1989 Name:</b>            Definitive estimate (typically -5% to + 15%).</p> <p><b>Alternate Estimate Names, Terms, Expressions, Synonyms:</b>            Detailed control, forced detail, execution phase, master control, engineering, bid, tender, change order estimate.</p>

Figure 2d. – Class 2 Estimate

<b>CLASS 1 ESTIMATE</b>	
<p><b>Description:</b>            Class 1 estimates are generally prepared for discrete parts or sections of the total project rather than generating this level of detail for the entire project. The parts of the project estimated at this level of detail will typically be used by subcontractors for bids, or by owners for check estimates. The updated estimate is often referred to as the current control estimate and becomes the new baseline for cost/schedule control of the project. Class 1 estimates may be prepared for parts of the project to comprise a fair price estimate or bid check estimate to compare against a contractor’s bid estimate, or to evaluate/dispute claims. Typically, engineering is from 50% to 100% complete, and would comprise virtually all engineering and design documentation of the project, and complete project execution and commissioning plans.</p> <p><b>Level of Project Definition Required:</b>            50% to 100% of full project definition.</p> <p><b>End Usage:</b>            Class 1 estimates are typically prepared to form a current control estimate to be used as the final control baseline against which all actual costs and resources will now be monitored for variations to the budget, and form a part of the change/variation control program. They may be used to evaluate bid checking, to support vendor/contractor negotiations, or for claim evaluations and dispute resolution.</p>	<p><b>Estimating Methods Used:</b>            Class 1 estimates involve the highest degree of deterministic estimating methods, and require a great amount of effort. Class 1 estimates are prepared in great detail, and thus are usually performed on only the most important or critical areas of the project. All items in the estimate are usually unit cost line items based on actual design quantities.</p> <p><b>Expected Accuracy Range:</b>            Typical accuracy ranges for Class 1 estimates are -3% to -10% on the low side, and +3% to +15% on the high side, depending on the technological complexity of the project, appropriate reference information, and the inclusion of an appropriate contingency determination. Ranges could exceed those shown in unusual circumstances.</p> <p><b>Effort to Prepare (for US\$20MM project):</b>            Class 1 estimates require the most effort to create, and as such are generally developed for only selected areas of the project, or for bidding purposes. A complete Class 1 estimate may involve as little as 600 hours or less, to perhaps more than 6,000 hours, depending on the project and the estimating methodology used. Bid estimates typically require more effort than estimates used for funding or control purposes.</p> <p><b>ANSI Standard Reference Z94.2 Name:</b>            Definitive estimate (typically -5% to + 15%).</p> <p><b>Alternate Estimate Names, Terms, Expressions, Synonyms:</b>            Full detail, release, fall-out, tender, firm price, bottoms-up, final, detailed control, forced detail, execution phase, master control, fair price, definitive, change order estimate.</p>

Figure 2e. – Class 1 Estimate



February 2, 2005

**COMPARISON OF CLASSIFICATION PRACTICES**

Figures 3a through 3c provide a comparison of the estimate classification practices of various firms, organizations, and published sources against one another and against the guideline classifications. These tables permits users to benchmark their own classification practices.

	AACE Classification Standard	ANSI Standard Z94.0	AACE Pre-1972	Association of Cost Engineers (UK) ACostE	Norwegian Project Management Association (NFP)	American Society of Professional Estimators (ASPE)
	Class 5	Order of Magnitude Estimate -30/+50	Order of Magnitude Estimate	Order of Magnitude Estimate Class IV -30/+30	Concession Estimate	Level 1
					Exploration Estimate	
					Feasibility Estimate	
	Class 4	Budget Estimate -15/+30	Study Estimate	Study Estimate Class III -20/+20	Authorization Estimate	Level 2
	Class 3		Preliminary Estimate	Budget Estimate Class II -10/+10	Master Control Estimate	Level 3
	Class 2	Definitive Estimate -5/+15	Definitive Estimate	Definitive Estimate Class I -5/+5	Current Control Estimate	Level 4
Class 1	Detailed Estimate		Level 5			
					Level 6	

**Figure 3a. – Comparison of Classification Practices**

Cost Estimate Classification System – As Applied in Engineering  
 Procurement, and Construction for the Process Industries



February 2, 2005

AAACE Classification Standard	Major Consumer Products Company (Confidential)	Major Oil Company (Confidential)	Major Oil Company (Confidential)	Major Oil Company (Confidential)
Class 5	Class S Strategic Estimate	Class V Order of Magnitude Estimate	Class A Prospect Estimate	Class V
			Class B Evaluation Estimate	
Class 4	Class 1 Conceptual Estimate	Class IV Screening Estimate	Class C Feasibility Estimate	Class IV
			Class D Development Estimate	
Class 3	Class 2 Semi-Detailed Estimate	Class III Primary Control Estimate	Class E Preliminary Estimate	Class III
			Class F Master Control Estimate	
Class 2	Class 3 Detailed Estimate	Class II Master Control Estimate	Class F Master Control Estimate	Class II
Class 1		Class I Current Control Estimate	Current Control Estimate	Class I

Figure 3b. – Comparison of Classification Practices

AAACE Classification Standard	J.R. Heizelman, 1988 AAACE Transactions [1]	K.T. Yeo, The Cost Engineer, 1989 [2]	Stevens & Davis, 1988 AAACE Transactions [3]	P. Behrenbruck, Journal of Petroleum Technology, 1993 [4]
Class 5	Class V	Class V Order of Magnitude	Class III*	Order of Magnitude
Class 4	Class IV	Class IV Factor Estimate	Class II	Study Estimate
Class 3	Class III	Class III Office Estimate		Budget Estimate
Class 2	Class II	Class II Definitive Estimate	Class I	Control Estimate
Class 1	Class I	Class I Final Estimate		

[1] John R. Heizelman, ARCO Oil & Gas Co., 1988 AAACE Transactions, Paper V3.7  
 [2] K.T. Yeo, The Cost Engineer, Vol. 27, No. 6, 1989  
 [3] Stevens & Davis, BP International Ltd., 1988 AAACE Transactions, Paper B4.1 (\* Class III is inferred)  
 [4] Peter Behrenbruck, BHP Petroleum Pty., Ltd., article in Petroleum Technology, August 1993

Figure 3c. – Comparison of Classification Practices

**ESTIMATE INPUT CHECKLIST AND MATURITY MATRIX**

Figure 4 maps the extent and maturity of estimate input information (deliverables) against the five estimate classification levels. This is a checklist of basic deliverables found in common practice in the process industries. The maturity level is an approximation of the degree of completion of the deliverable. The degree of completion is indicated by the following letters.

- None (blank): development of the deliverable has not begun.
- Started (S): work on the deliverable has begun. Development is typically limited to sketches, rough outlines, or similar levels of early completion.
- Preliminary (P): work on the deliverable is advanced. Interim, cross-functional reviews have usually been conducted. Development may be near completion except for final reviews and approvals.
- Complete (C): the deliverable has been reviewed and approved as appropriate.

General Project Data:	ESTIMATE CLASSIFICATION				
	CLASS 5	CLASS 4	CLASS 3	CLASS 2	CLASS 1
Project Scope Description	General	Preliminary	Defined	Defined	Defined
Plant Production/Facility Capacity	Assumed	Preliminary	Defined	Defined	Defined
Plant Location	General	Approximate	Specific	Specific	Specific
Soils & Hydrology	None	Preliminary	Defined	Defined	Defined
Integrated Project Plan	None	Preliminary	Defined	Defined	Defined
Project Master Schedule	None	Preliminary	Defined	Defined	Defined
Escalation Strategy	None	Preliminary	Defined	Defined	Defined
Work Breakdown Structure	None	Preliminary	Defined	Defined	Defined
Project Code of Accounts	None	Preliminary	Defined	Defined	Defined
Contracting Strategy	Assumed	Assumed	Preliminary	Defined	Defined
<b>Engineering Deliverables:</b>					
Block Flow Diagrams	S/P	P/C	C	C	C
Plot Plans		S	P/C	C	C
Process Flow Diagrams (PFDs)		S/P	P/C	C	C
Utility Flow Diagrams (UFDs)		S/P	P/C	C	C
Piping & Instrument Diagrams (P&IDs)		S	P/C	C	C
Heat & Material Balances		S	P/C	C	C
Process Equipment List		S/P	P/C	C	C
Utility Equipment List		S/P	P/C	C	C
Electrical One-Line Drawings		S/P	P/C	C	C
Specifications & Datasheets		S	P/C	C	C
General Equipment Arrangement Drawings		S	P/C	C	C
Spare Parts Listings			S/P	P	C
Mechanical Discipline Drawings			S	P	P/C
Electrical Discipline Drawings			S	P	P/C
Instrumentation/Control System Discipline Drawings			S	P	P/C
Civil/Structural/Site Discipline Drawings			S	P	P/C

**Figure 4. – Estimate Input Checklist and Maturity Matrix**

**REFERENCES**

ANSI Standard Z94.2-1989. **Industrial Engineering Terminology: Cost Engineering.**  
 AACE International Recommended Practice No.17R-97, **Cost Estimate Classification System.**

**CONTRIBUTORS**

Peter Christensen, CCE (Author)  
 Larry R. Dysert, CCC (Author)  
 Jennifer Bates, CCE

Cost Estimate Classification System – As Applied in Engineering  
Procurement, and Construction for the Process Industries



---

February 2, 2005

Dorothy J. Burton  
Robert C. Creese, PE CCE  
John K. Hollmann, PE CCE  
Kenneth K. Humphreys, PE CCE  
Donald F. McDonald, Jr. PE CCE  
C. Arthur Miller  
Bernard A. Pietlock, CCC  
Wesley R. Querns, CCE  
Don L. Short, II

Projected amounts from Part III attachment U-21534 FG Att 9.7

Line No.	(a) Facility	(b) Calendar Year	(c) Unit	(d) High Level Breakdown	(e) Description	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)	(r)	(s)	(t)	
						Forecasted May-24	Forecasted Jun-24	Forecasted Jul-24	Forecasted Aug-24	Forecasted Sep-24	Forecasted Oct-24	Forecasted Nov-24	Forecasted Dec-24	Forecasted May-Dec 2024	15% reduction	PAT level from project sheets	
128	Belle River/Range Road	2024	1	Safety	Unit 1 480 Volt Breakers	14,779	14,836	14,893	14,950	15,007	15,064	15,121	1,610,384	1,715,032	(257,255)	PAT 0 REV 0	
129	Belle River/Range Road	2024	1	Safety	Unit 1 Medium Voltage Breakers	2,316	668,499	716,021	148,063	30,556	23,175	23,243	80,342	1,692,214	(253,832)	PAT 0 REV 0	
130	Belle River/Range Road	2024	1	Reliability	Unit 1 East Boiler Feed Pump Turbine Blades & Rotor	27,928	5,015	5,024	515,703	30,353	7,142	7,150	7,159	605,473	(90,821)	PAT 0 REV 1	
131	Belle River/Range Road	2024	1	Reliability	Unit 1 White Coal Mill	417,966	18,002	-	-	-	-	-	-	-	435,968	-	-
132	Belle River/Range Road	2024	2	Safety	Unit 2 LP Turbine Rotor & Blades	603,500	26,404	-	-	-	-	-	-	-	629,905	-	PAT 2 REV 0
133	Belle River/Range Road	2024	2	Reliability	Unit 2 Waterwall Tubes	46,780	-	-	-	-	-	-	-	-	46,780	-	PAT 2 REV 0
134	Belle River/Range Road	2024	2	Reliability	Unit 2 Exciter	126,964	3,303	-	-	-	-	-	-	-	130,267	-	PAT 2 REV 0
135	Belle River/Range Road	2024	2	Safety	Unit 2 IP Turbine Valves	12,937	-	-	-	-	-	-	-	-	12,937	-	PAT 2 REV 1
136	Belle River/Range Road	2024	2	Safety	Unit 2 Turbine Stop Valve Actuators	361,769	43,960	-	-	-	-	-	-	-	405,729	-	PAT 2 REV 1
137	Belle River/Range Road	2024	2	Safety	Unit 2 480 Voltage Breakers	14,667	14,725	14,784	14,842	14,899	14,958	15,016	1,622,952	1,726,844	(259,027)	PAT 0 REV 0	
138	Belle River/Range Road	2024	2	Safety	Unit 2 Medium Voltage Breakers	3,044	704,761	37,483	6,037	707,753	40,615	107,459	14,263	1,621,416	(243,212)	PAT 0 REV 0	
139	Belle River/Range Road	2024	2	Reliability	Unit 2 Primary Superheat Tubes	4,900	-	-	-	-	-	-	-	-	4,900	-	PAT 2 REV 3
140	Belle River/Range Road	2024	Common	Safety	Unit 1 & 2 Common Systems 480 Volt Breakers	62,064	22,402	19,679	19,753	19,826	19,899	19,973	2,203,305	2,386,901	(358,035)	PAT 0 REV 0	
141	Belle River/Range Road	2024	Common	Safety	Unit 1 & 2 Common Systems Medium Voltage Breakers	2,327	712,922	762,631	240,950	35,309	23,943	24,011	21,183	1,823,275	(273,491)	PAT 0 REV 0	
142	Belle River/Range Road	2024	Common	Minor Environmental	Underground Storage Tanks 387 and 388	155,932	169,321	392,812	405,944	379,852	34,520	4,919	13,822	1,557,121	(233,568)	PAT 0 REV 1	
143	Belle River/Range Road	2024	Common	Minor Environmental	Underground Storage Tank 393	267,573	257,230	332,713	385,237	226,496	20,130	5,769	15,697	1,510,846	(226,627)	PAT 0 REV 0	
144	Blue Water Energy Center	2024	Common	Infrastructure	Circulating Water Pumps Enclosure	47,333	41,963	260,396	757,240	807,161	622,976	511,413	467,068	3,515,550	(527,333)	PAT 0/1 REV 0	
145	Blue Water Energy Center	2024	Common	Safety	Conference Room Building	603,097	283,225	320,041	321,381	322,721	254,677	46,471	16,886	2,168,499	(325,275)	PAT 0 REV 1	
146	Blue Water Energy Center	2024	Common	Reliability	Control Server	13,312	13,346	13,379	13,414	13,447	13,481	13,515	11,817	105,711	(15,857)	PAT 0 REV 0	
147	Blue Water Energy Center	2024	ST1	Reliability	STG Transformer	8,745	1,001,415	45,986	6,221	6,230	6,237	6,245	6,253	1,087,332	(163,100)	PAT 0 REV 0	
148	Greenwood Energy Center	2024	1	Safety	Unit 1 LP Turbine Rotor & Blades	175,692	82,968	75,463	2,136,536	1,572,315	2,285,560	232,100	2,748,156	9,308,790	(1,396,318)	PAT 1 REV 4	
149	Greenwood Energy Center	2024	1	Reliability	Unit 1 Feedwater Heater #6	262,546	52,018	133,328	116,062	199,217	47,283	40,888	983,825	(147,574)	(147,574)	PAT 1 REV 1	
150	Greenwood Energy Center	2024	1	Reliability	Unit 1 Feedwater Heater #3	181,635	27,963	157,862	250,380	210,211	105,950	34,739	30,455	999,195	(149,879)	PAT 1 REV 1	
151	Monroe without Large Enviro.	2024	1	Minor Environmental	Unit 1 SCR Catalyst Layer 3	640,582	17,963	18,025	17,459	17,578	18,114	650,602	17,635	1,397,958	(209,694)	PAT 0 REV 1	
152	Monroe without Large Enviro.	2024	1	Reliability	Unit 1 IP Turbine Rotor	13,624	13,625	162,118	21,525	14,205	14,206	14,207	72,626	326,134	(48,920)	PAT 0/1 REV 0	
153	Monroe without Large Enviro.	2024	2	Safety	Unit 2 LPA & LPB Turbine Rotor and Blades	138,673	15,594	15,601	15,608	15,616	15,623	4,605,170	198,733	5,020,618	(753,093)	PAT 0 REV 1	
154	Monroe without Large Enviro.	2024	2	Reliability	Unit 2 Air Heater Cold End Baskets	12,932	12,951	244,052	151,404	413,021	1,274,912	866,639	135,146	3,111,056	(466,568)	PAT 1 REV 2	
155	Monroe without Large Enviro.	2024	2	Minor Environmental	Unit 2 SCR Catalyst	37,367	8,448	538,113	348,397	594,573	606,087	198,813	23,480	2,355,279	(353,292)	PAT 0/1 REV 0	
156	Monroe without Large Enviro.	2024	2	Reliability	Unit 2 Coal Mill Feeder Controls	28,398	13,590	13,635	45,962	182,734	413,055	331,909	139,080	1,168,365	(175,255)	PAT 1 REV 1	
157	Monroe without Large Enviro.	2024	3	Reliability	Unit 3 Waterwall Tubes	2,134,734	151,548	49,883	-	-	-	149,666	6,592	-	2,492,423	-	PAT 2 REV 2
158	Monroe without Large Enviro.	2024	3	Minor Environmental	Unit 3 SCR Catalyst	664,295	590,853	121,132	4,313	-	-	-	-	-	1,380,593	-	PAT 2 REV 0
159	Monroe without Large Enviro.	2024	3	Safety	Unit 3 Coal Mill Primary Air Duct & Damper	1,345,525	61,166	3,503	-	-	-	-	-	-	1,410,194	-	PAT 2 REV 0
160	Monroe without Large Enviro.	2024	3	Safety	Unit 3 Turbine Valves	1,721,539	75,912	1,771	1,771	-	-	-	-	-	1,800,993	(270,149)	PAT 0/2 REV 2
161	Monroe without Large Enviro.	2024	3	Reliability	Unit 3 IP Turbine Blades	1,245,849	335,572	12,688	-	-	-	-	-	-	1,594,109	-	PAT 2 REV 0
162	Monroe without Large Enviro.	2024	3	Reliability	Unit 3 Expansion Joints	824,587	348,362	20,939	-	-	-	-	-	-	1,193,887	-	PAT 2 REV 0
163	Monroe without Large Enviro.	2024	3	Reliability	Unit 3 Reheat Outlet Pendants	397,830	116,212	4,526	-	-	-	-	-	-	518,568	-	PAT 2 REV 0
164	Monroe without Large Enviro.	2024	3	Reliability	Unit 3 Air Heater Cold End Baskets	593,170	140,541	322,935	19,980	-	-	-	-	-	1,076,626	-	PAT 2 REV 1
165	Monroe without Large Enviro.	2024	3	Reliability	Unit 3 Horizontal Reheater Tubes	413,146	129,177	9,555	-	-	-	-	-	-	551,878	-	PAT 2 REV 0
166	Monroe without Large Enviro.	2024	3	Reliability	Unit 3 DCS & Control Room	1,134,300	185,576	26,153	-	-	-	-	-	-	1,346,030	-	PAT 2 REV 0
167	Monroe without Large Enviro.	2024	3	Reliability	Unit 3 Coal Mill Classifiers	531,911	114,933	5,940	1,771	-	-	-	-	-	654,556	-	PAT 2 REV 1
168	Monroe without Large Enviro.	2024	3	Reliability	Unit 3 Coal Mill 3-7 Silo	203,032	44,833	-	-	-	-	-	-	-	247,866	-	PAT 2 REV 2
169	Monroe without Large Enviro.	2024	4	Safety	Unit 4 LPA & LPB Turbine Rotor and Blades	28,759	30,322	30,344	30,366	26,831	26,838	1,009,091	2,899,681	4,080,232	(612,035)	PAT 1 REV 1	
170	Monroe without Large Enviro.	2024	4	Minor Environmental	Unit 4 SCR Catalyst	18,184	20,005	2,301,697	141,585	27,383	27,427	29,248	1,138,099	3,703,629	(555,544)	PAT 0/1 REV 0	
171	Monroe without Large Enviro.	2024	4	Safety	Unit 4 Coal Mill Primary Air Duct & Damper	30,279	46,140	135,517	183,084	408,000	290,723	284,732	390,737	1,764,212	(264,632)	PAT 0/1 REV 0	
172	Monroe without Large Enviro.	2024	4	Reliability	Unit 4 Expansion Joints	6,216	326,241	22,113	9,220	9,245	11,047	648,996	42,666	1,075,743	(161,361)	PAT 1 REV 1	
173	Monroe without Large Enviro.	2024	4	Safety	Unit 4 Turbine Valves	4,220	421,247	241,232	15,383	6,972	6,990	7,007	445,982	1,149,033	(172,355)	PAT 0 REV 0	
174	Monroe without Large Enviro.	2024	Common	Minor Environmental	Underground Storage Tank 389	177,205	7,627	-	-	-	-	-	-	-	184,832	-	PAT 2 REV 2
175	Monroe without Large Enviro.	2024	Fuel Supply	Safety	Fuel Supply Tripper Gallery C Infrastructure	1,064,723	1,168,903	144,909	1,130,827	631,783	74,028	30,501	396,062	4,641,735	-	PAT 2 REV 0	
176	Monroe without Large Enviro.	2024	Fuel Supply	Combustible Dust	Fuel Supply CV-C2 Loading Zone Transfer Chutes	5,520	7,306	7,321	998,412	776,917	614,991	41,724	15,241	2,467,432	(370,115)	PAT 0/1 REV 0	
177	Monroe without Large Enviro.	2024	Fuel Supply	Minor Environmental	Fuel Supply Coal Pile Runoff Oil Waste Water System	35,429	-	-	-	-	-	-	-	-	35,429	-	PAT 2 REV 1
178	Peakers	2024	Belle River	Reliability	Belle River 13-1 Peaker Combustion Overhaul	3,542	1,519	-	-	-	-	-	-	-	5,061	-	PAT 2 REV 2
179	Peakers	2024	DTE	Reliability	Blackstart Peaker Unit 1 Startling System	23,422	23,507	23,593	30,073	854,341	1,310,434	85,409	24,634	2,375,414	-	-	
180	Peakers	2024	Greenwood	Reliability	Greenwood 11-1 Peaker Major Overhaul	38,625	3,542	551,455	1,441,659	1,666,952	1,083,147	621,857	601,909	6,007,145	(901,072)	PAT 0/2 REV 0	
181	Peakers	2024	Greenwood	Minor Environmental	Greenwood 11-1, 11-2 & 12-1 Peakers Exhaust Silencers	343,114	513,872	29,368	-	-	-	-	-	-	886,354	-	PAT 2 REV 0
182	Peakers	2024	Greenwood	Reliability	Greenwood 11-1 Peaker Generator Field	2,656	2,656	2,656	75,806	959,009	239,260	205,086	205,721	1,692,850	(253,928)	PAT 0/2 REV 0	
183	Peakers	2024	Renaissance	Reliability	Renaissance Unit 1 Peaker Generator Stator & Rotor	4,194,765	2,414,651	697,477	33,715	-	-	-	-	-	7,340,608	-	PAT 2 REV 2
184	Peakers	2024	Renaissance	Reliability	Renaissance Unit 3 Peaker Generator Stator Rewind & Rotor	3,388	6,819	6,832	6,845	6,859	1,590,643	2,512,318	2,888,642	7,022,345	-	-	PAT 2 REV 1
185	Peakers	2024	Renaissance	Reliability	Renaissance Unit 1 Peaker Main Unit Transformer	516,529	512,102	29,466	3,861	1,771	-	-	-	-	1,063,730	(159,559)	PAT 1 REV 3
186	Trenton Channel	2024	Sibley	Minor Environmental	Sibley Quarry Capping Section 1A	922,889	1,243,548	139,056	78,936	65,037	64,477	2,844	-	2,516,788	-	-	PAT 2 REV 2

15% reduction for May-December 2024 for PAT 0 and PAT 1 projects (10,648,865)

Line No.	(a) Facility	(b) Test Year	(c) Unit	(d) High Level Breakdown	(e) Description	(f) Amount	(g) 20 % reduction	(h) PAT Level
188	Belle River/Range Road	2025	1	Reliability	Unit 1 Waterwall Tubes	6,347,145	(1,269,429)	PAT 0 REV 1
189	Belle River/Range Road	2025	1	Reliability	Unit 1 Secondary Air Heater Baskets	5,288,096	(1,057,619)	PAT 0 REV 0
190	Belle River/Range Road	2025	1	Safety	Unit 1 IP Turbine Valves	4,475,894	(895,179)	PAT 0 REV 1
191	Belle River/Range Road	2025	1	Reliability	Unit 1 Duplex Heater	3,258,602	(651,720)	PAT 0 REV 1
192	Belle River/Range Road	2025	1	Reliability	Unit 1 Expansion Joints	2,607,260	(521,452)	PAT 0 REV 1
193	Belle River/Range Road	2025	1	Reliability	Unit 1 Horizontal Middle Reheat Tubes	2,197,608	(439,522)	PAT 0 REV 0
194	Belle River/Range Road	2025	1	Reliability	Unit 1 East Boiler Feed Pump Turbine Blades & Rotor	2,392,484	(478,497)	PAT 0 REV 1
195	Belle River/Range Road	2025	Common	Minor Environmental	Range Road Landfill Capping (Area G2 Phase II)	5,022,703	(1,004,541)	PAT 1 REV 0
196	Belle River/Range Road	2025	Common	Safety	North Auxiliary Boiler	1,869,086	(373,817)	PAT 0 REV 1
197	Belle River/Range Road	2025	Common	Safety	South Auxiliary Boiler	1,866,836	(373,367)	PAT 0 REV 2
198	Blue Water Energy Center	2025	ST1	Reliability	STG Transformer	1,900,068	(380,014)	PAT 0 REV 0
199	Blue Water Energy Center	2025	Common	Reliability	CT Transformer	1,798,256	(359,651)	PAT 0 REV 1
200	Blue Water Energy Center	2025	Common	Reliability	Control Server	1,701,212	(340,242)	PAT 0 REV 0
201	Greenwood Energy Center	2025	1	Safety	Unit 1 LP Turbine Rotor & Blades	5,863,594	(1,172,719)	PAT 1 REV 4
202	Greenwood Energy Center	2025	1	Reliability	Unit 1 Feedwater Heater #6	2,225,303	(445,061)	PAT 1 REV 1
203	Greenwood Energy Center	2025	1	Reliability	Unit 1 Feedwater Heater #3	2,117,684	(423,537)	PAT 1 REV 1
204	Greenwood Energy Center	2025	1	Safety	Unit 1 Turbine Valves	1,765,657	(353,131)	PAT 1 REV 1
205	Greenwood Energy Center	2025	1	Reliability	Unit 1 North Boiler Feed Pump Turbine Blades	1,508,890	(301,778)	PAT 1 REV 2
206	Greenwood Energy Center	2025	1	Minor Environmental	Underground Storage Tank 377	1,310,838	(262,168)	PAT 0 REV 1
207	Monroe without Large Enviro.	2025	1	Reliability	Unit 1 IP Turbine Rotor	4,167,682	(833,536)	PAT 0/1 REV 0
208	Monroe without Large Enviro.	2025	1	Minor Environmental	Unit 1 SCR Catalyst Layer 3	2,530,867	(506,173)	PAT 0 REV 1
209	Monroe without Large Enviro.	2025	1	Reliability	Unit 1 Coal Mill Feeder Controls	1,363,072	(272,614)	PAT 0/1 REV 0
210	Monroe without Large Enviro.	2025	2	Safety	Unit 2 LPA & LPB Turbine Rotor and Blades	10,976,839	(2,195,368)	PAT 0 REV 1
211	Monroe without Large Enviro.	2025	2	Minor Environmental	Unit 2 SCR Catalyst Layers 1, 2, & 4	4,399,643	(879,929)	PAT 0 REV 1
212	Monroe without Large Enviro.	2025	2	Reliability	Unit 2 North & South Air Heater Hot End Baskets	2,993,448	(598,690)	PAT 0 REV 0
213	Monroe without Large Enviro.	2025	4	Safety	Unit 4 LPA & LPB Turbine Rotor and Blades	5,257,264	(1,051,453)	PAT 1 REV 1
214	Monroe without Large Enviro.	2025	4	Safety	Unit 4 Turbine Valves	4,194,728	(838,946)	PAT 0 REV 0
215	Monroe without Large Enviro.	2025	4	Minor Environmental	Unit 4 SCR Catalyst Layers 1, 3, & 4	3,588,903	(717,781)	PAT 0/1 REV 0
216	Monroe without Large Enviro.	2025	4	Safety	Unit 4 Coal Mill Primary Air Duct & Damper	2,649,721	(529,944)	PAT 0/1 REV 0
217	Monroe without Large Enviro.	2025	4	Reliability	Unit 4 Expansion Joints	2,381,698	(476,340)	PAT 1 REV 0
218	Monroe without Large Enviro.	2025	4	Minor Environmental	Unit 4 FGD Inlet Expansion Joint Flange Mod & Joint	2,054,274	(410,855)	PAT 1/2 REV 0
219	Monroe without Large Enviro.	2025	4	Reliability	Unit 4 DCS & Control Room	1,914,456	(382,891)	PAT 0 REV 1
220	Monroe without Large Enviro.	2025	4	Reliability	Unit 4 Secondary Heat Exchanger	1,906,379	(381,276)	PAT 1 REV 0
221	Monroe without Large Enviro.	2025	Common	Reliability	U2A Emergency Reactor Cooling & GSW Return Piping	1,038,478	(207,696)	PAT 0 REV 0
222	Monroe without Large Enviro.	2025	Common	Reliability	U2A Reactor Condensate Return	1,032,462	(206,492)	PAT 0 REV 0
223	Monroe without Large Enviro.	2025	Fuel Supply	Safety	Fuel Supply Tripper Gallery D Infrastructure	7,134,048	(1,426,810)	PAT 0 REV 1
224	Monroe without Large Enviro.	2025	Fuel Supply	Safety	Fuel Supply Dust Collector 04	1,900,054	(380,011)	PAT 0 REV 1
225	Peakers	2025	DTE	Reliability	Blackstart Peaker Unit 2 Starting System	2,794,791	(558,958)	N/A
226	Peakers	2025	Delray	Minor Environmental	Delray 11-1 & 12-1 Peaker Exhaust Silencers	1,894,035	(378,807)	PAT 0 REV 1
227	Peakers	2025	Greenwood	Reliability	Greenwood 11-2 Peaker Major Overhaul	1,179,132	(235,826)	PAT 0 REV 1
228	Peakers	2025	Greenwood	Reliability	Greenwood 12-1 Peaker Major Overhaul	1,137,038	(227,408)	PAT 0 REV 1
229	Peakers	2025	Renaissance	Reliability	Renaissance 4 Peaker Exhaust Cylinder & Manifold	8,658,508	(1,731,702)	PAT 0 REV 1
230	Peakers	2025	Renaissance	Reliability	Renaissance Unit 2 Peaker Generator Rotor	3,214,388	(642,878)	PAT 0 REV 1
231	Peakers	2025	DTE	Reliability	Blackstart Unit Major Overhaul	6,376,480	(1,275,296)	N/A
232	<b>Total 2025 Projects</b>					<b>142,255,604</b>		

**20% reduction for 2025 for all PAT0 and PAT1 projects (28,451,121)**

**Michigan Public Service Commission  
 DTE Electric Company  
 Projected Capital Expenditures  
 Midwest Energy Resources Company (MERC) & Fuel Supply  
 (\$000)**

Line No.	(a) Description	(b)	(c)	(d)	(e)	(f)
		Capital Expenditures				Projected Test Year
		Historical	Projected Bridge Period			
	12 mos. ended 12/31/2022	12 mos. ending 12/31/2023	12 mos. ending 12/31/2024	24 mos. ending 12/31/2024	12 mos. ending 12/31/2025	
					<i>col. (c)+(d)</i>	
1	<u>MERC:</u>					
2	Conveyor Belting	563	112	-	112	-
3	D11 Caterpillar Dozer	295	-	-	-	-
4	85' Man Lift	153	-	-	-	-
5	Large Mobile - Major Components (Engine, Transmission, etc.)	-	254	106	360	54
6	Terminal Roadways & Railroad Tracks	-	117	-	117	-
7	750KVA & 1500KVA Transformers	-	165	-	165	-
8	Other Capital Spend <\$100K	213	278	184	462	100
9	Total MERC	1,224	926	290	1,216	154
10	<u>Fuel Supply:</u>					
11	Railcar truck/ draft system rebuilds	1,000	700	1,000	1,700	1,000
12	Total Fuel Supply	1,000	700	1,000	1,700	1,000
13	<b>Total MERC and Fuel Supply</b>	<b>2,224</b>	<b>1,626</b>	<b>1,290</b>	<b>2,916</b>	<b>1,154</b>
			Actual amounts from STDE-2.21a and 2.21b	1,495	1,318	
			<b>Difference updating with actual amounts through April 2024</b>	<b>(131)</b>	<b>28</b>	

**Midwest Energy Resources Company (MERC) & Fuel Supply  
 Actual Capital Expenditures  
 (\$000's)**

Case: U-21534  
 Response: STDE-2.21a  
 Respondent: D. Milo

Line No.	(a) Description	(b) Jan-22	(c) Feb-22	(d) Mar-22	(e) Apr-22	(f) May-22	(g) Jun-22	(h) Jul-22	(i) Aug-22	(j) Sep-22	(k) Oct-22	(l) Nov-22	(m) Dec-22	(n) Actual 12 mos. ended 12/31/2022
1	<u>MERC:</u>													
2	Conveyor Belting			284	147							132		563
3	D11 Caterpillar Dozer										277	18		295
4	85' Man Lift								138			15		153
5	Other Capital Spend <\$100K	11	38	36	28	23	14	9	11	16	55	(53)	24	213
6	Total MERC	11	38	320	175	23	14	9	149	16	331	112	24	1,224
7	<u>Fuel Supply:</u>													
8	Railcar truck/ draft system rebuilds	142	134	179	145	-	110	192	86	-	-	-	13	1,000
9	Total Fuel Supply	142	134	179	145	-	110	192	86	-	-	-	13	1,000
10	<b>Total MERC and Fuel Supply</b>	<b>153</b>	<b>172</b>	<b>499</b>	<b>320</b>	<b>23</b>	<b>124</b>	<b>201</b>	<b>236</b>	<b>16</b>	<b>331</b>	<b>112</b>	<b>37</b>	<b>2,223</b>

Line No.	Description	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Actual 12 mos. ended 12/31/2023
11	<u>MERC:</u>													
12	Conveyor Belting	23	61		51									135
13	Large Mobile - Major Components (Engine, Transmiss	25	22	139	25						42			253
14	Terminal Roadways & Railroad Tracks							20		83				103
15	750KVA & 1500KVA Transformers									102	45	15		161
16	Other Capital Spend <\$100K	10	13	24	29	6	15	4	21	14	6	4	74	221
17	Total MERC	58	96	163	105	6	15	24	21	200	92	18	74	873
18	<u>Fuel Supply:</u>													
19	Railcar truck/ draft system rebuilds	-	166	-	-	-	-	31	64	26	150	134	51	622
20	Total Fuel Supply	-	166	-	-	-	-	31	64	26	150	134	51	622
21	<b>Total MERC and Fuel Supply</b>	<b>58</b>	<b>262</b>	<b>163</b>	<b>105</b>	<b>6</b>	<b>15</b>	<b>55</b>	<b>85</b>	<b>226</b>	<b>242</b>	<b>152</b>	<b>125</b>	<b>1,495</b>



**DTE Electric Company**  
**Projected Capital Expenditures**  
**Nuclear Production Plant**  
**Routine and Small Projects**  
**(\$000)**

Line No.	Project Name	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	Forecasted May-Dec 24	Forecasted Jan-Dec 25
1	<b>Routine and Small Projects</b>							
2	Undervessel replacements	212	865	49	1,177	44	985	-
3	Visual Annunciator System (VAS) replacement	-	-	-	-	-	-	-
4	Security system computer	715	423	466	459	403	7,837	-
5	Plant radio system	567	362	342	74	72	-	-
6	Residual heat removal service water outlet valve (F068A/B) replacement	76	96	317	1,129	819	767	-
7	Environmentally Qualified (EQ) seal replacements	-	-	-	-	-	-	-
8	Safety relief valves (SRVs)	391	(812)	22	1,076	1,037	287	759
9	Snubbers	23	(14)	9	796	228	10	32
10	Low Pressure Turbine (LPT) expansion joints	-	-	-	-	-	-	-
11	Unitized actuators (UAs) replacement	507	195	373	699	593	986	230
12	Residual Heat Removal (RHR) motors replacement	117	532	285	1,005	644	521	949
13	High pressure stop and control valves (HPSV/HPCV) replacement	528	190	666	1,512	1,123	943	-
14	Reactor recirculation system (RRS) replacements	-	-	-	-	-	-	-
15	Main Steam Isolation Valves (MSIV) replacement	227	5	(1)	750	1,121	-	-
16	Low pressure stop and intercept valves (LPSV/LPIV) replacements	352	125	588	994	350	945	-
17	Valve replacements	146	(97)	190	210	1,536	5	-
18	Main steam bypass valve (MSBV) replacement	-	-	-	-	-	-	-
19	Core spray line vents	108	204	114	102	188	255	-
20	Diesel fire pump	-	-	-	-	-	-	-
21	Emergency equipment service water (EESW) pump	-	-	-	-	-	-	-
22	Motor operated valves (MOV)	-	-	-	-	-	-	-
23	Reactor Protection System (RPS) motor-generator (MG) set replacements	(385)	13	13	420	195	-	176
24	Emergency Diesel Generator (EDG) cylinder liner replacements	-	-	-	-	-	-	-
25	Flow accelerated corrosion (FAC) program piping insulation	73	1	195	278	1,011	-	-
26	Owner Controlled Area (OCA) security access control system	-	-	-	-	-	-	-
27	Residual heat removal service water (RHRSW) pump	-	-	-	-	-	-	-
28	Control rod drive mechanism (CRDM) replacement	56	12	25	142	635	-	4,867
29	Moisture separator reheater relief valve (MSRRV)	-	-	-	-	-	-	-
30	General plant tools	1,505	203	168	401	469	1,669	3,375
31	Heater Drains Pump (HDP) replacement	-	-	-	-	-	-	-
32	Condensate pump	205	6	184	250	79	-	189
33	Residual Heat Removal (RHR) HVAC hydramotors	-	-	-	-	-	83	45
34	Breaker replacement	-	-	-	-	-	190	265
35	Plant wireless	183	279	139	88	41	5,615	-
36	Condensate filter demineralizer (CFD) septas	1	-	180	50	1	349	345
37	Refuel bridge mast	-	-	-	-	-	-	-
38	Refuel Floor monorail replacement	(6)	20	22	41	10	-	-
39	Switchyard footer replacement	-	-	-	-	-	132	-
40	Unitized Actuator shop	8	6	6	4	56	58	-
41	Hot machine shop	947	456	388	313	2	-	-
42	Contractor lime & work tracking system	-	-	-	-	-	-	-
43	Piping replacements	28	1	(26)	46	8	-	-
44	Security defensive strategy simulator	-	-	-	-	-	-	-
45	Control rod blade (CRB) replacements	1,495	31	(9)	-	-	-	887
46	Pump and motor replacements	-	44	3	57	672	-	-
47	Reverse osmosis system replacement	-	-	-	-	-	-	2,597
48	Independent Spent Fuel Storage Installation (ISFSI) casks	2	1	-	2	1,028	301	282
49	Integrated Plant Computer System (IPCS) replacement	-	-	-	-	-	-	-
50	Paperless recorders replacement	-	-	-	-	-	126	124
51	Roof replacements	568	33	-	-	-	-	-
52	Neutron Monitoring System replacements	22	17	32	16	10	420	-
53	SCRAM discharge header	320	366	234	348	(41)	-	-
54	Temporary power modifications	180	22	18	9	2	1,842	-
55	Balance of plant (BOP) battery replacement	85	32	18	212	568	-	-
56	Reactor feed pump turbine (RFPT) rotor	167	59	124	249	844	331	-
57	Hydrogen seal replacement	124	46	93	165	264	244	-
58	Heater Feed Pump (HFP) replacement	-	-	-	217	164	-	-
59	Natural draft cooling towers	-	-	42	4	915	-	9,515
60	Document management system enhancements	-	-	-	-	-	-	9,992
61	Remote monitoring	-	-	-	-	-	-	4,473
62	Electronic work package system	-	-	-	-	-	-	2,584
63	GSW Pump House Critical Digital Asset (CDA)	-	-	-	-	-	-	745
64	Balance of Projects (<\$500K)	-	53	3	11	115	14	16
65	<b>Total Routine and Small Projects</b>	<b>9,547</b>	<b>3,775</b>	<b>5,272</b>	<b>13,306</b>	<b>15,196</b>	<b>24,915</b>	<b>42,450</b>
	<b>Difference between actual Dec 23 to Apr 24 to projections</b>	(1,442)	(3,167)	(7,936)	(71)	4,745	<b>15% reduction for May-Dec 24</b> (3,737)	<b>20% reduction for Jan-Dec 2025</b> (8,490)
	Total difference between actual Dec 23 to Apr 24 to projections in case as filed						(7,870)	
	Projections in case Dec 23 to Apr 24						54,966	
	Percent Reduction of actual compared to projections for Dec 23 to Apr 24						-14.3%	



Michigan Public Service Commission  
 DTE Electric Company  
 Projected Operation and Maintenance Expenses  
 Steam Power Generation  
 (\$000)

MPSC Case No.: U-21534  
 Requestor: Staff  
 Question No.: STDE-9.1 Sup  
 Respondent: M. Guillaumin

Line No.	Description	Account	(c) 2023	Rate Case Adjustments			Projected Adjustments					(l) Total Projected Adjustments	(m) Projected Test Period
				(d) Reclass Fuel Handling to O&M 2/	(e) Reclass MERC Fuel Handling Non-O&M Expense 3/	(f) Historical Adjustments 4/	(g) Adjusted Historical Test Period	(h)	(i) 1/1/24 - 12/31/24 Inflation Adj 5/	(j) 1/1/25 - 12/31/25 Inflation Adj 5/	(k) Other Adjustments 6/		
1	<b>Steam Power Generation</b>						sum (c) thru (f)					sum (h) thru (k)	(g) + (l)
2	<b>Operation</b>												
3	Operation Supervision and Engineering	500	8,114	-	-	2,445	10,558	-	306	315	-	621	11,180
4	Fuel Handling	501	-	23,332	(6,391)	5,854	22,795	-	661	680	-	1,341	24,136
5	Steam Expenses	502	13,634	-	-	422	14,056	-	408	419	-	827	14,883
6	Steam from Other Sources	503	-	-	-	-	-	-	-	-	-	-	-
7	(Less) Steam Transferred-Cr.	504	-	-	-	-	-	-	-	-	-	-	-
8	Electric Expenses	505	2,193	-	-	(162)	2,032	-	59	61	-	120	2,151
9	Misc Steam Power Expenses	506	27,763	-	-	3,541	31,304	-	908	934	-	1,842	33,146
10	Rents	507	-	-	-	-	-	-	-	-	-	-	-
11	Total Operation Expense		<u>51,704</u>	<u>23,332</u>	<u>(6,391)</u>	<u>12,100</u>	<u>80,744</u>	<u>-</u>	<u>2,342</u>	<u>2,409</u>	<u>-</u>	<u>4,751</u>	<u>85,495</u>
12	<b>Maintenance</b>												
13	Maintenance Supervision and Engineering	510	295	-	-	-	295	-	9	9	-	17	313
14	Maintenance of Structures	511	5,038	-	-	3,414	8,452	-	245	252	-	497	8,949
15	Maintenance of Boilers	512	39,266	-	-	14,987	54,253	-	1,573	1,619	-	3,192	57,445
16	Maintenance of Electric Plant	513	7,023	-	-	1,263	8,286	-	240	247	-	488	8,774
17	Maintenance of Misc Steam Plant	514	32,710	-	-	5,718	38,428	-	1,114	1,147	-	2,261	40,690
18	Total Maintenance Expense		<u>84,332</u>	<u>-</u>	<u>-</u>	<u>25,382</u>	<u>109,714</u>	<u>-</u>	<u>3,182</u>	<u>3,274</u>	<u>-</u>	<u>6,456</u>	<u>116,170</u>
19	Total Steam Power Generation		136,036	23,332	(6,391)	37,482	190,458	-	5,523	5,683	-	11,207	201,665
20	Less Fuel Supply & MERC Fuel Handling	1/	<u>1,672</u>	<u>12,226</u>	<u>(6,391)</u>	<u>-</u>	<u>7,507</u>	<u>-</u>	<u>218</u>	<u>224</u>	<u>(297)</u>	<u>145</u>	<u>7,652</u>
21	Total Steam excluding Fuel Supply & MERC		<u>134,363</u>	<u>11,106</u>	<u>-</u>	<u>37,482</u>	<u>182,951</u>	<u>-</u>	<u>5,306</u>	<u>5,459</u>	<u>297</u>	<u>11,062</u>	<u>194,013</u>

1/ Reclassify Fuel Supply and MERC Fuel Handling sponsored by Witness Milo on Exh A-13, C5.2

2/ Reclassify Fuel Handling O&M charged to Fuel Account 501

3/ Portion of MERC Fuel Handling Charge that is reallocated to other line item classifications within net operating income (see Witness Milo's Exh A-13, C5.2)

4/ Historical Adjustments:

	Account	Amount
Corporate Membership Adjustment	506	(42)
Temporary reductions from deferral of non time-critical contract labor maintenance activities	500,501,502, 505, 506, 511, 512,513,514	6,780
Temporary reductions from deferral of non time-critical material procurement	500,501,502, 505, 506, 511, 512,513,514	11,231
Temporary delay in hiring to replace employees that retired or left the company	500,501,502, 505, 506, 511, 512,513,514	8,698
Periodic Outage Timing	506, 511, 512,513,514	7,232
Environmental compliance requirements	506	3,583
Total Estimated Historical Adjustments		<u>37,482</u>

	1/1/23 - 12/31/23	1/1/24 - 12/31/24	1/1/25 - 12/31/25
5/ Annual Inflation Rate	0.00%	2.90%	2.90%
No. of Months in Period	<u>12</u>	<u>12</u>	<u>12</u>
Pro-rated Inflation Rate (sponsored by Witness T. Uzenski on Exh. A-13, Sch.C5.15)	0.00%	2.90%	2.90%

6/ Projected Adjustments

	Account	Amount
Projected savings from reduced operations as transshipments decrease	501	(297)

Michigan Public Service Commission  
 DTE Electric Company  
 Projected Operation and Maintenance Expenses  
 Fuel Supply & Midwest Energy Resources Company (MERC)  
 (\$000)

Line No.	(a) Description	(b) Account	(c) 1/1/2023 - 12/31/2023	Rate Case Adjustments		(f) Adjusted Historical Test Period	Projected Adjustments				(k) Total Projected Adjustments	(l) Projected Test Period
				(d) Reclass Fuel Handling to O&M 1/	(e) Reclass MERC Fuel Handling Non-O&M Expense 2/ 2/		(g) 1/1/24 - 12/31/24 Inflation Adj 3/	(h) 1/1/25 - 12/31/25 Inflation Adj 3/	(i) Other Adjustments 4/	(j) Total		
						sum (c) thru (e)					sum (g) thru (j)	(f) + (k)
1	<b>Fuel Supply</b>											
2	Operation Supervision and Engineering	500	533	-	-	533	-	15	16	-	31	565
3	Fuel Handling	501	-	2,484	-	2,484	-	72	74	-	146	2,630
4	Misc Steam Power Expenses	506	37	-	-	37	-	1	1	-	2	39
5	Maintenance Supervision and Engineering	510	79	-	-	79	-	2	2	-	5	84
6	Maintenance of Misc Steam Plant	514	1,023	-	-	1,023	-	30	31	-	60	1,084
7	Total Fuel Supply		1,672	2,484	-	4,156	-	121	124	-	245	4,401
8	<b>MERC Fuel Handling</b>											
9	O&M			3,351	-	3,351	-	97	100	(297)	(100)	3,251
10	Depreciation			3,985	(3,985)	-	-	-	-	-	-	-
11	Property Taxes			865	(865)	-	-	-	-	-	-	-
12	Payroll Taxes			172	(172)	-	-	-	-	-	-	-
13	Income Taxes			(31)	31	-	-	-	-	-	-	-
14	Interest Expense			1,400	(1,400)	-	-	-	-	-	-	-
15	Total MERC Fuel Handling	501		9,742	(6,391)	3,351	-	97	100	(297)	(100)	3,251
16	Total Fuel Supply & MERC Fuel Handling		1,672	12,226	(6,391)	7,507	-	218	224	(297)	145	7,652

1/ Reclassify Fuel Supply's Fuel Handling O&M charged to Fuel Account 501

2/ MERC fuel handling is reallocated to the proper line item classification within net operating income as shown on Exhibit A-3 C16 sponsored by Witness Uzenski.

	1/1/23 - 12/31/23	1/1/24 - 12/31/24	1/1/25 - 12/31/25
3/ Annual Inflation Rate	0.00%	2.90%	2.90%
No. of Months in Period	12	12	12
Pro-rated Inflation Rate	0.00%	2.90%	2.90%
(sponsored by Witness T. Uzenski on Exh. A-13, Sch.C5.15)			

4/ Projected savings from reduced operations as transshipments decrease

Michigan Public Service Commission  
 DTE Electric Company  
 Projected Operation and Maintenance Expenses  
 Nuclear Power Generation  
 (\$000)

Discovery Response STDE-9.5

Line No.	(a) Description	(b) Account	(c) 2023	(d) Rate Case Adjustments			(e) Projected Adjustments						(m) Total Projected Adjustments	(n) Projected Test Period
				(f) Nuclear Surcharge 1/	(g) Reclassify PERC	(h) Historical Adjustments 2/	(i) Adjusted Historical Test Period	(j) 1/1/24 - 12/31/24 Inflation Adj 3/	(k) 1/1/25 - 12/31/25 Inflation Adj 3/	(l) Outage Accrual 4/	(m) PERC Amortization 5/			
1	<b>Nuclear Power Generation</b>													
2	<b>Operation</b>						sum (c) thru (f)						sum (h) thru (l)	(g) + (m)
3	Operation Supervision and Engineering	517	9,330	(172)	-	-	9,158	-	266	273	-	-	539	9,696
4	Coolants and Water	519	3,307	-	-	-	3,307	-	96	99	-	-	195	3,502
5	Steam Expenses	520	12,459	(4,772)	-	-	7,687	-	223	229	(622)	-	(170)	7,517
6	Steam from Other Sources	521	-	-	-	-	-	-	-	-	-	-	-	-
7	(Less) Steam Transferred-Cr.	522	-	-	-	-	-	-	-	-	-	-	-	-
8	Electric Expenses	523	3,960	-	-	-	3,960	-	115	118	-	-	233	4,193
9	Misc Nuclear Power Expenses	524	57,638	(22,832)	(356)	1,088	35,538	-	1,031	1,060	-	-	2,091	37,629
10	Rents	525	-	-	-	-	-	-	-	-	-	-	-	-
11	Station Expense	562	(20)	-	-	-	(20)	-	(1)	(1)	-	-	(1)	(21)
12	Total Operation Expense		86,673	(27,776)	(356)	1,088	59,629	-	1,729	1,779	(622)	-	2,886	62,516
13	<b>Maintenance</b>													
14	Maintenance Supervision and Engineering	528	13,592	-	-	-	13,592	-	394	406	-	-	800	14,392
15	Maintenance of Structures	529	18,972	(20)	-	-	18,952	-	550	566	-	-	1,115	20,067
16	Maintenance of Reactor Plant Equipment	530	33,943	(0)	(13,825)	-	20,118	-	583	600	(1,866)	-	(683)	19,435
17	Maintenance of Electric Plant	531	15,488	-	(13,085)	4,070	6,472	-	188	193	-	-	381	6,853
18	Maintenance of Misc Nuclear Plant	532	15,204	-	(209)	-	14,995	-	435	447	-	-	882	15,878
19	Maintenance of station equipment	570	-	-	-	-	-	-	-	-	-	-	-	-
20	Total Maintenance Expense		97,199	(20)	(27,119)	4,070	74,130	-	2,150	2,212	(1,866)	-	2,495	76,625
	<b>PERC Regulatory Asset</b>													
21	PERC Base Expense		-	-	15,000	-	15,000	-	-	-	-	-	-	15,000
22	Reg Asset Amortization-PERC		-	-	12,475	-	12,475	-	-	-	-	(7,621)	(7,621)	4,854
23	Total PERC Expense		-	-	27,475	-	27,475	-	-	-	-	(7,621)	(7,621)	19,854
24	Total Nuclear Power Generation		183,873	(27,796)	-	5,158	161,235	-	3,879	3,992	(2,489)	(7,621)	(2,239)	158,996

1/ Eliminate O&M expenses recovered separately in Nuclear Surcharge

Amount	Account
(16,133)	524 Site Security
(11,663)	517-520,524 ,530,531 Radiation Protection
(27,796)	

3/ Annual Inflation Rate	1/1/23 - 12/31/23	1/1/24 - 12/31/24	1/1/25 - 12/31/25
No. of Months in Period	0.00%	2.90%	2.90%
	12	12	12
Pro-rated Inflation Rate	0.00%	2.90%	2.90%
(sponsored by Witness T. Uzenski on Exh. A-13, Sch.C5.15)			

2/ Historical Adjustments:

Amount	Account
1,116	524 Utility Service Alliance (USA) Refund Adjustment (one-time difference)
4,070	529 Staffing temporarily below long-term sustainable threshold
(28)	524 Excluded membership dues

4/ Outage Accrual Projection Adjustment:	Amount	Account
Outage Accrual Steam Expense	(622)	520
Outage Accrual Reactor Plant Maint.	(1,866)	530
Total Outage Accrual	(2,489)	

5/ PERC (Performance Evaluation Review Committee) regulatory asset amortization sponsored by Witness T. Uzenski on Exh. A-13, Sch.C5.17

**Michigan Public Service Commission  
 DTE Electric Company  
 Projected Operation and Maintenance Expenses  
 Other Power Generation  
 (\$000)**

Case No.: U-21534  
 Discovery Request: ABDE-1.6 Supplemental

Line No.	(a) Description	(b) Account	(c) 2023 Actual	(d) Estimated Rate Case Adjustments 1/2	Estimated Historical Adjustments 3/	(e) Estimated Adjusted 2023
1	<b>Other Power Generation</b>					sum (c) thru (d)
2	<b>Operation</b>					
3	Operation Supervision and Engineering	546	-	-	-	-
4	Generation Expenses	548	4,180		507	4,687
5	Misc Other Power Expenses	549	16,362	(15,063)		1,299
6	Rents	550	-	-	-	-
7	Total Operation Expense		<u>20,542</u>	<u>(15,063)</u>	<u>507</u>	<u>5,986</u>
8	<b>Maintenance</b>					
9	Maintenance Supervision and Engineering	551	-	-	-	-
10	Maintenance of Structures	552	-	-	-	-
11	Maintenance of Generating & Electric Plant	553	38,520	(25,366)	1,783	14,937
12	Maintenance of Misc Other Power Plant	554	1,993	-	1,202	3,195
13	Total Maintenance Expense		<u>40,513</u>	<u>(25,366)</u>	<u>2,985</u>	<u>18,132</u>
14	<b>Power Supply Related Expenses</b>					
15	Operation Supervision and Engineering	556	2,658	-	-	2,658
16	Generation Expenses	557	<u>2</u>	<u>(2)</u>	<u>118</u>	<u>118</u>
17	Total Expense		<u>2,660</u>	<u>(2)</u>	<u>118</u>	<u>2,776</u>
18	Total Other Power Generation Expenses		<u>63,715</u>	<u>(40,431)</u>	<u>3,610</u>	<u>26,894</u>

Inflation 2024 2.9%  
 Inflation 2025 2.9%  
 27,673 28,476

1/ Eliminate Renewable Energy Program

2/ Rate Case Adjustments	Account	Amount
Eliminate Renewable Energy Program	549, 553, 557	(40,431)

3/ Normalization Adjustments:	Account	Amount
Normalization of Periodic Outage spend	548, 553, 554, 557	1,667
Temporary reductions for deferral of non time-critical material procurement	548, 553, 554, 557	988
Temporary delay of hiring replacement employees.	548, 553, 554, 557	220
BWEC Routine Maintenance	554, 557	735
Total Estimated Historical Adjustments		<u>3,610</u>

STATE OF MICHIGAN  
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

\* \* \* \* \*

In the matter of the application of )  
**DTE ELECTRIC COMPANY** )  
for authority to increase its rates, amend ) Case No. U-21534  
its rate schedules and rules governing the )  
distribution and supply of electric energy, )  
and for miscellaneous accounting authority.)

**PROOF OF SERVICE**

Michelle L. Conarton, being duly sworn, deposes and says that on July 26, 2024, A.D., she emailed a copy of the attached MPSC Testimony and Exhibits to the persons as shown on the attached list.

\_\_\_\_\_  
Michelle L. Conarton

Subscribed and sworn to before me  
this 26<sup>th</sup> day of July 2024.

*Jillian Bowden*  
\_\_\_\_\_  
Jillian Bowden, Notary Public  
State of Michigan, County of Ingham  
Acting in the County of Eaton  
My Commission Expires June 19, 2025

**DTE Electric Company:**

Jon P. Christinidis  
Andrea Hayden  
Paula Johnson-Bacon  
John Janiszewski  
Breanne Reitzel  
[jon.christinidis@dteenergy.com](mailto:jon.christinidis@dteenergy.com)  
[andrea.hayden@dteenergy.com](mailto:andrea.hayden@dteenergy.com)  
[paula.bacon@dteenergy.com](mailto:paula.bacon@dteenergy.com)  
[john.janiszewski@dteenergy.com](mailto:john.janiszewski@dteenergy.com)  
[breanne.reitzel@dteenergy.com](mailto:breanne.reitzel@dteenergy.com)  
[mpscfilings@dteenergy.com](mailto:mpscfilings@dteenergy.com)

**MPSC Staff:**

Monica Stephens  
Michael Orris  
Heather Durian  
Amit Singh  
Lori Mayabb  
[stephensm1@michigan.gov](mailto:stephensm1@michigan.gov)  
[orrism@michigan.gov](mailto:orrism@michigan.gov)  
[durianh@michigan.gov](mailto:durianh@michigan.gov)  
[singha9@michigan.gov](mailto:singha9@michigan.gov)  
[mayabbl@michigan.gov](mailto:mayabbl@michigan.gov)

**ALJ:**

Sally Wallace  
[wallaces2@michigan.gov](mailto:wallaces2@michigan.gov)

**Michigan Cable Telecommunications Association**

Sean Gallagher  
[sgallagher@fraserlawfirm.com](mailto:sgallagher@fraserlawfirm.com)

**AG:**

Joel King  
[kingj38@michigan.gov](mailto:kingj38@michigan.gov)  
[ag-enra-spec-lit@michigan.gov](mailto:ag-enra-spec-lit@michigan.gov)  
Sebastian Coppola  
[sebcoppola@corplytics.com](mailto:sebcoppola@corplytics.com)

**MEC; Sierra Club; NRDC; CUB**

Tracy Jane Andrews  
Christopher Bzdok  
Breanna Thomas  
[tjandrews@tropospherelegal.com](mailto:tjandrews@tropospherelegal.com)  
[chris@tropospherelegal.com](mailto:chris@tropospherelegal.com)  
[breanna@tropospherelegal.com](mailto:breanna@tropospherelegal.com)

Josh Denzler  
Julilyn Gibbons  
David Gard  
Douglas Jester  
Matt Bandyk  
Paul Alvarez  
Dennis Stephens  
[jdenzler@5lakesenergy.com](mailto:jdenzler@5lakesenergy.com)  
[jgibbons@5lakesenergy.com](mailto:jgibbons@5lakesenergy.com)  
[dgard@5lakesenergy.com](mailto:dgard@5lakesenergy.com)  
[djester@5lakesenergy.com](mailto:djester@5lakesenergy.com)  
[mbandyk@5lakesenergy.com](mailto:mbandyk@5lakesenergy.com)  
[palvarez@wiredgroup.net](mailto:palvarez@wiredgroup.net)  
[dennis.stephens@hotmail.com](mailto:dennis.stephens@hotmail.com)

**Association of Businesses Advocating  
Tariff Equity**

Stephen Campbell  
Michael Pattwell  
Brian Andrews  
Jim Dauphinais  
Christopher Walters  
Jessica York  
[scampbell@clarkhill.com](mailto:scampbell@clarkhill.com)  
[mpattwell@clarkhill.com](mailto:mpattwell@clarkhill.com)  
[bandrews@consultbai.com](mailto:bandrews@consultbai.com)  
[jdauphinais@consultbai.com](mailto:jdauphinais@consultbai.com)  
[cwalters@consultbai.com](mailto:cwalters@consultbai.com)  
[jyork@consultbai.com](mailto:jyork@consultbai.com)

**The Kroger Company**

Michael Kurtz  
Kurt Boehm  
Jody Kyler Cohn  
[mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)  
[kboehm@BKLawfirm.com](mailto:kboehm@BKLawfirm.com)  
[jkylercohn@BKLawfirm.com](mailto:jkylercohn@BKLawfirm.com)

**Local 223, Utility Workers Union of  
America (UWUA), AFL-CIO**

Benjamin King  
[bking@michworkerlaw.com](mailto:bking@michworkerlaw.com)

**Walmart, Inc.**

Melissa Horne  
[mhorne@hcc-law.com](mailto:mhorne@hcc-law.com)

**Environmental Law & Policy Center;  
Ecology Center; Union of Concerned  
Scientists; Vote Solar**

Daniel Abrams  
Nicholas Wallace  
William Kenworthy  
Michael Oliva  
[dabrams@elpc.org](mailto:dabrams@elpc.org)  
[nwallace@elpc.org](mailto:nwallace@elpc.org)  
[will@votesolar.org](mailto:will@votesolar.org)  
[moliva@fosterswift.com](mailto:moliva@fosterswift.com)  
[mpscdocket@elpc.org](mailto:mpscdocket@elpc.org)

**Michigan Municipal Association for  
Utility Issues**

**City of Ann Arbor**

Valerie Brader  
Valerie Jackson  
Rick Bunch  
Linda Hofrichter  
[valerie@rivenoaklaw.com](mailto:valerie@rivenoaklaw.com)  
[vjackson@a2gov.org](mailto:vjackson@a2gov.org)  
[rick@mi-maui.org](mailto:rick@mi-maui.org)  
[lhd@rivenoaklaw.com](mailto:lhd@rivenoaklaw.com)

**Great Lakes Renewable Energy  
Association**

Don Keskey  
Brian Coyer  
[donkeskey@publiclawresourcecenter.com](mailto:donkeskey@publiclawresourcecenter.com)  
[bwcoyer@publiclawresourcecenter.com](mailto:bwcoyer@publiclawresourcecenter.com)

**Soulardarity**

**We Want Green, Too**

Amanda Urban

Mark Templeton

Jacob Schuhardt

Madison Wilson

Samuel Heppell

Boris Lukanov

Justin Schott

[t-9aurba@lawclinic.uchicago.edu](mailto:t-9aurba@lawclinic.uchicago.edu)

[templeton@uchicago.edu](mailto:templeton@uchicago.edu)

[jschuhardt@uchicago.edu](mailto:jschuhardt@uchicago.edu)

[madisonwilson@uchicago.edu](mailto:madisonwilson@uchicago.edu)

[heppell@uchicago.edu](mailto:heppell@uchicago.edu)

[blukanov@psehealthyenergy.org](mailto:blukanov@psehealthyenergy.org)

[jbschott@umich.edu](mailto:jbschott@umich.edu)

[aelc\\_mpsc@lawclinic.uchicago.edu](mailto:aelc_mpsc@lawclinic.uchicago.edu)

**EVgo Services, LLC**

Nikhil Vijaykar

Michael Oliva

David Nacht

Lindsey Stegall

Alicia Zaloga

[nvijaykar@keyesfox.com](mailto:nvijaykar@keyesfox.com)

[moliva@fosterswift.com](mailto:moliva@fosterswift.com)

[dnacht@nachtlaw.com](mailto:dnacht@nachtlaw.com)

[lindsey.stegall@evgo.com](mailto:lindsey.stegall@evgo.com)

[azaloga@keyesfox.com](mailto:azaloga@keyesfox.com)

**International Transmission Company**

Richard Aaron

Olivia Flower

Hannah E. Buzolits

Courtney Kissel

[raaron@dykema.com](mailto:raaron@dykema.com)

[oflower@dykema.com](mailto:oflower@dykema.com)

[hbuzolits@dykema.com](mailto:hbuzolits@dykema.com)

[ckissel@dykema.com](mailto:ckissel@dykema.com)

[mpscfilings@dykema.com](mailto:mpscfilings@dykema.com)

**Energy Michigan, Inc.;**

**Michigan Energy Innovation Business Council; Institute for Energy Innovation**

**Advanced Energy United; Foundry**

**Association of Michigan**

Laura Chappelle

Timothy Lundgren

Justin Ooms

Justin Barnes

[lochappelle@potomaclaw.com](mailto:lochappelle@potomaclaw.com)

[tlundgren@potomaclaw.com](mailto:tlundgren@potomaclaw.com)

[jooms@potomaclaw.com](mailto:jooms@potomaclaw.com)

[jbarnes@eq-research.com](mailto:jbarnes@eq-research.com)

**Michigan EIBC/IEI/United**

Laura Sherman

[laura@mieibc.org](mailto:laura@mieibc.org)

**Electrify America, LLC**

Jennifer Morante

Stephen Bright

[Steve.bright@electrifyamerica.com](mailto:Steve.bright@electrifyamerica.com)

[jmorante@grsm.com](mailto:jmorante@grsm.com)