S T A T E O F M I C H I G A N

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter of the application of DTE ELECTRIC COMPANY and DTE GAS COMPANY for approval of an Expedited Pilot Review Workplan.	)))))	Case No. U-21653

COMMENTS REGARDING DTE ELECTRIC'S PROPOSED WORKPLAN

ConnectDER appreciates the opportunity to file comments regarding DTE Electric's Proposed Workplan. ConnectDER is a manufacturer of meter socket adapters (MSAs), a type of interconnection device for distributed energy resources like solar, EV charging, and other electrical loads. ConnectDER has engaged with this process to date by participating in DTE's Public Open House calls and submitting comments through DTE's E-form questionnaire. Technologies like MSAs have direct benefits towards the workplan areas of DER integration, beneficial electrification, and resiliency. Given the wealth of developments in the energy sector, we second DTE's statement that "there is a need to support rapid learning about energy innovation, new technologies, and business processes."[1] However, we find that a number of DTE's suggestions in the worklplan "Pilot Problem Statements" could be addressed through an even more efficient format within the pilot process. **ConnectDER recommends that DTE should establish a streamlined track within the pilot process for technologies that are widely used in other jurisdictions and don't impact the rate base.**

Certain technology solutions suggested in the workplan should only require a short pilot timeline. In the workplan, DTE suggests piloting technologies that have been available on the market for years and have been proven effective in other states and utility jurisdictions. For example, the workplan suggests exploring EV charging and integration technologies (focus area #4, problem statements #2 and #4), electric HVAC systems (focus area #4, problem statement

[1] See "DTE Energy's Expedited Pilot Process Workplan", Page 1

#1), and efficient interconnection technologies (focus area #2, problem statement #9). These technologies are established and are being deployed en masse in other states. Notably, these types of technologies are customer-owned and would not impact the rate base outside of potential rebates or incentives for customer adoption. Though we find it reasonable to explore such technologies through a pilot program, we believe they should not require as much time or involvement from the utility as other proposed solutions. The ask is to implement straightforward policy changes to enable customer adoption of the technology.

We suggest that a streamlined track should exist within the pilot program for technologies to become available to DTE customers if they enable benefits addressed through the Focus Areas, have no meaningful impact on the rate base, meet basic safety standards, and are in use in other utility service territories. ConnectDER has seen utilities implement processes around beneficial DER technologies within a matter of months. For example, utilities have established processes for customer owned meter socket adapters (MSAs) in many states, including Colorado, Arizona, New Jersey, and others. In Colorado[2] and New Jersey,[3] utilities updated their standards and created a process for approving customer-owned MSAs in 180 days. In Arizona,[4] this took only 90 days. Technologies that enable DERs and electrification, such as meter socket adapters, EV chargers, and electric HVAC systems need limited to no involvement from the utility in order to deploy, which makes such updates possible within a shorter time frame than a typical pilot program. Additionally, since third-party deployment of these technologies can be designed to have no meaningful impact on the rate base, they should not need further regulatory involvement to move beyond pilot status. A clear pathway from pilot status to full implementation will give electricians and customers predictability on when they can use these technologies.

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[2] In accordance with CO Senate Bill 21-261 "Concerning Measures to Increase the Deployment of Renewable Energy Generation Facilities" https://leg.colorado.gov/sites/default/files/2021a_261_signed.pdf

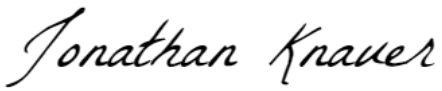
[3] In accordance with NJ Senate Bill 3092, "An Act Concerning Certain Electrical Equipment Used on Residential Electric Meters" https://www.njleg.state.nj.us/bill-search/2022/S3092

[4] In accordance with regulatory decisions to update small generator interconnection manuals. Arizona Public Service, Decision 78783 of Docket No. E-01345A-20-0152 https://docket.images.azcc.gov/0000208037.pdf?i=1725892831297 , Tucson Electric Power, Decision 78597 of ACC Docket No. E-01933A-20-0116 https://docket.images.azcc.gov/0000207189.pdf?i=1712765297878

Conclusions

ConnectDER suggests that the DTE Workplan be revised to create a streamlined track within the pilot process for certain technologies to be tested and transitioned to full-scale implementation. If a technology is widely utilized in other jurisdictions, DTE can reference the performance of the technology in those jurisdictions to verify the effectiveness and reliability rather than needing to conduct a full-length pilot. We suggest a fast-track within the pilot process as a middle ground to allow DTE to explore technologies before rolling them out to all customers, but not unduly delaying access to these technologies. We urge DTE to create such a process for technologies that enable benefits addressed through the Focus Areas, have no meaningful impact on the rate base, meet basic safety standards, and are in use in other utility service territories.

Respectfully submitted,



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