



ENVIRONMENTAL LAW & POLICY CENTER

October 23, 2024

Ms. Lisa Felice
Michigan Public Service Commission
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P. O. Box 30221
Lansing, MI 48909

RE: MPSC Case No. U-21534

Dear Ms. Felice:

**Reply Brief of The Ecology Center, The Environmental Law & Policy
Center, The Union of Concerned Scientists, and Vote Solar**

Proof of Service

Sincerely,

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csb
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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) Case No. U-21534
rules governing the distribution and supply of)
electric energy, and for miscellaneous)
accounting authority.)

**REPLY BRIEF OF THE ECOLOGY CENTER, THE ENVIRONMENTAL
LAW & POLICY CENTER, THE UNION OF CONCERNED SCIENTISTS, AND VOTE
SOLAR**

October 23, 2024

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The Ecology Center, the Environmental Law & Policy Center (“ELPC”), the Union of Concerned Scientists, and Vote Solar (collectively, the Clean Energy Organizations (“CEO”)), focus their reply brief on the following issues: (1) CEO Witness Volkmann’s recommended improvements to the Company’s distribution system modeling tools; (2) MNSC Witness Douglas Jester’s proposal to divide the residential class into subgroups based on dwelling type and type of home heating; (3) the need for mitigation measures if the Commission approves DTE’s proposed transition to a default residential time-of-use rate; (4) the importance of DTE establishing a non-conventional solution framework to scale its deployment of new technologies; (5) the need for DTE to expand its energy justice analysis beyond reliability; and (6) the Company’s proposed spending on electric vehicle infrastructure.

I. Introduction

DTE’s opening brief largely failed to engage with the CEO’s testimony on a wide range of issues including: suggested improvements to the Company’s foundational distribution and reliability models, the CEO’s testimony on Illinois utility ComEd’s residential subclasses based on heating and dwelling type, the specific recommendation to develop a non-conventional solution framework, and the CEO’s recommended metrics which the Company should track to improve its understanding of how its EJ customers experience the grid. Perhaps this failure relates to the CEO’s largely favorable view of the Company’s progress in developing a benefit-cost analysis for its pole top maintenance and modernization program, and the further development of its Reliability and Distribution Automation models. However, the Commission should take special note of the CEO’s process improvement recommendations because they are reasonable, attainable, and will ultimately lead to better results.

II. The Commission Should Require DTE to Improve and Expand Its Distribution System Models

In testimony and in briefs, the CEO both commended DTE for introducing several underlying distribution system analytical models and recommended upgrades to improve the models. Volkmann Direct, 6 TR 3243; CEO Opening Br. at 10. CEO Witness Volkmann testified in particular regarding the Company's Reliability Model, its Distribution Automation Model, and its use of benefit-cost analysis for its pole top maintenance and modernization ("PTMM") program. Witness Volkmann found the basic structure of these models to be reasonable. Volkmann Direct, 6 TR 3243. He also had several recommendations for improving the models.

First, the Company must utilize actual DTE performance data in each of its models, rather than assumptions and estimates generated by subject matter experts. CEO Opening Br. at 11, 14. The Company committed to make this improvement, and the Commission should memorialize that commitment in its order. Kryscynski Rebuttal, 3 TR 447.

Second, DTE must expand the scope of each of its models to include more programs in order to better assess the cost effectiveness of its spending. For example, the Company's Reliability Model can be expanded to include other distribution programs including URD replacement, cable replacement, breaker replacement, and substation risk. CEO Opening Br. at 10, 14-15.

Similarly, the Company only conducted a benefit-cost analysis for its PTMM and strategic undergrounding program. CEO Opening Br. at 14. Going forward, the CEO recommend that the Commission order DTE to expand its use of benefit-cost analysis to its other major distribution programs including: 4.8 kV hardening, 4.8 kV conversions, distribution automation, and subtransmission redesign and rebuild. The CEO also made several recommendations to improve the accuracy of the benefit-cost analysis. CEO Opening Br. at 13-15.

DTE's opening brief largely failed to engage with CEO Witness Volkmann's testimony suggesting process improvements to the Company's distribution system models. For example, after a detailed discussion of other witnesses' critiques of the Company's distribution capital spending programs, DTE's brief states "Company witness Kryscynski also touched on a number of additional points regarding the Reliability Model, BCA, and other matters in response to CEO witness Volkmann's recommendations." DTE Opening Br. at 84. The CEO addressed Witness Kryscynski's responses in their opening brief. CEO Opening Br. at 10-15. To summarize, the Company expresses varying degrees of interest in implementing improvements to its models. For example, the Company committed to utilize actual performance data in future models but did not explicitly commit to extend its use of benefit-cost analysis to the rest of its major distribution programs. Kryscynski Rebuttal, 3 TR 448. The Commission should ensure that the Company follows through on its commitments from rebuttal testimony, *see* CEO Opening Br. at 11-12, 14, and also order the Company to implement the CEO's other recommended process improvements. *Id.* at 33-34.

Elsewhere in its opening brief, the Company objected to MNS-AG Witness Stephens' related suggestion to develop a cost-benefit model for its distribution automation investments, pointing to the existence of the Distribution Automation Prioritization model, which ranks projects but does not quantify costs and benefits. DTE Opening Br. at 131-2. CEO Witness Volkmann made a similar recommendation. Volkmann Direct, 6 TR 3249. The CEO understand the value in the Company expanding its distribution automation programs, Volkmann Direct, 6 TR 3249; CEO Opening Br. at 12, but the Company must demonstrate that value through a robust cost-benefit analysis.

As stated above, the Company agreed to implement some of the CEO's recommendations but demonstrated a more tepid response to others. Each of CEO Witness Volkmann's recommendations would lead to better processes and more transparency for the significant spending the Company plans for its distribution system. The Commission should memorialize the Company's commitments where appropriate and otherwise ensure that the Company makes necessary improvements to its underlying distribution system models by ordering those improvements in this rate case.

III. The Commission Should Order DTE to Investigate Dividing the Residential Class Into Subclasses Based on Heating and Dwelling Type

In rebuttal testimony, CEO Witness Kenworthy supported and expanded upon MNSC Witnesses Jester and Gard's recommendation to subdivide the residential class based on whether they use electric or fossil fuel heating. Kenworthy Rebuttal, 6 TR 3216; CEO Opening Br. at 15-16. Witness Kenworthy discussed the introduction of a similar subset of rates by ComEd in Illinois, which in addition to dividing residential customers by heating type, also split single-family and multi-family home customers into separate classes. Kenworthy Rebuttal, 3 TR 3218. Witness Kenworthy demonstrated, using ComEd's differing service classes, that there are "variations in daily and seasonal grid utilization among these classes." Kenworthy Rebuttal, 6 TR 3218. More specifically, "[s]ingle-family homes with electric space heating...tend to have higher peak demands during winter, whereas single-family homes without electric space heating are generally summer-peaking. Similarly, multi-family dwellings also show distinct patterns depending on their heating type." Kenworthy Rebuttal, 6 TR 3216.

In addition to failing to engage with Witness Kenworthy's testimony, the Company's responses to MNSC's suggestions should each be rejected. Specifically, the Company argued (1) that it does not have the data to split customers by heating and dwelling type; (2) that even if it did

possess the data, the differences do not justify different rate classes; and (3) that they already offer an electric heating rate. DTE Opening Br. at 308.

First, while DTE claims that it currently lacks data to evaluate the cost-of-service impacts for separate residential rate classes based on housing type and heating source, this should not serve as an obstacle to progressing toward a more equitable, cost-based rate structure. The solution is simple – DTE must collect the necessary data. As CEO Witness Kenworthy highlights, ComEd, a similar large utility in the Midwest, already implemented distinct rate classes for these customer groups, demonstrating the tangible benefits of such differentiation in a comparable regional context. Kenworthy Rebuttal, 6 TR 3217; CEO Opening Br. at 16. In light of this, the Commission should direct DTE to begin collecting data on single-family versus multi-family and electric versus non-electric heating customers. This data will not only facilitate more accurate rate designs but also support Michigan’s broader energy goals by enabling better-informed decisions about grid modernization, electrification, and customer impact in future rate cases.

Second, DTE’s assertion that there is no special significance to single-family versus multi-family residences or electric heating versus fossil fueled heating ignores substantial evidence in the record to the contrary. As demonstrated in Witness Kenworthy’s rebuttal testimony, single-family and multi-family residences, as well as the different heating types, exhibit markedly different load shapes that reflect different usage patterns and cost drivers. Kenworthy Rebuttal, 6 TR 3218. As mentioned above, electric space heating customers often have higher winter peak demand, while fossil fuel heating customers have higher summer peaks. Kenworthy Rebuttal, 6 TR 3216. In addition, these customers utilize the grid differently as electric space heating customers have higher consumption overall, but also higher load factors. Kenworthy Rebuttal, 6 TR 3218. These distinctions are not merely hypothetical. They are supported by rate structures in

neighboring Illinois, where ComEd recognizes these differences in cost-of-service approach. Kenworthy Rebuttal, 6 TR 3218. ComEd's approach ensures that customers are more equitably charged for their actual impact on the grid. Michigan's ratepayers deserve similar treatment.

Finally, as MNSC pointed out in its opening brief, the Company closed its voluntary electric space heating rate to new customers in 2015. MNSC Opening Br. at 195. The Company's refusal to even consider studying this issue in the face of significant policy and economic change around electrification is not reasonable. Therefore, the CEO urge the Commission to order DTE to study and propose a new set of tariffs to match the distinct load profiles of residential customers based on home type and heating type.

IV. If the Commission Allows DTE to Transition Customers From the D1.6 Rate to the D1.11 Rate, It Should Require DTE to Implement Additional Mitigation Measures for Vulnerable Customers

As part of its case, the Company proposes to shift the default residential rate from the D1.6 rate, a declining block rate, to the D1.11 rate, a time-of-use ("TOU") rate. Willis Direct, 6 TR 2591. In its opening brief, DTE argued that the Commission should approve its proposed transition. In particular, the Company argued that "[t]here is no reasonable basis for further delay or analysis, so the Commission should now adopt" the Company's proposal. DTE Opening Br. at 311.

In testimony and briefing, DAAO recommended that prior to making such a shift, DTE must more closely examine the rate impacts for low-income customers. Koepfel Direct, 6 TR 4403-09; DAAO Opening Br. at 68-70. The CEO support DAAO's position. CEO Opening Br. at 18. The CEO conducted a preliminary analysis of those rate impacts and found that a majority (roughly 2/3) of customers would have lower bills under the new rate. Kenworthy Rebuttal, 6 TR 3229; CEO Opening Br. at 18.

However, the CEO remain concerned about the rate impacts for the roughly one-third of customers who would see bill increases associated with the transition. Importantly, the Company

can utilize a combination of targeted outreach and smart meter data to mitigate those rate impacts. As CEO Witness Kenworthy explained, DTE can roll out expanded outreach to low-income customers focused on “educating them about opportunities to save money and providing them with tools – such as low-income energy efficiency programs, weatherization, and technology like smart thermostats – to further reduce their bills without compromising comfort or safety.” Kenworthy Rebuttal, 6 TR 3230. Further, the Company can use smart meter data to identify and target outreach to customers who see bill increases from the default rate transition. *Id.* Ultimately, the CEO recommend that if the Commission approves the Company’s proposal, it also order the Company to undertake the CEO’s recommended mitigation measures to reduce any bill impact to low-income customers.

V. The Commission Should Order DTE to Scale Up Deployment of Distributed Energy Resources and Other Non-Conventional Solutions for Distribution Grid Services.

As part of his assessment of the Company’s case, CEO Witness Volkmann conducted a review of the Company’s current set of pilot programs and their deployment of new technologies and “non-conventional solutions.” Volkmann discussed five types of non-conventional solutions, all of which DTE deploys some form of, including: CVR/VVO, geo-targeted energy waste reduction and demand response, battery storage plus solar, microgrids, and virtual power plants. CEO Opening Br. at 19-20; Volkmann Direct, 6 TR 3255-57. Witness Volkmann concluded that the Company’s set of pilots represents a good start, but the Company must formalize a process for converting pilots into programs that scale and deploy non-conventional solutions to maximize grid value. Volkmann Direct, 6 TR 3263. The Company should create this framework with input from stakeholders and with the intent of more quickly scaling up successful pilots into programs.

In its opening brief, DTE committed itself to its ongoing pilot process, stating that “it is committed to completing the ongoing NWA pilots and using the results to inform how to scale the

piloted technologies.” DTE Opening Br. at 148. Relatedly, MPSC Staff, responding to CEO Witness Volkmann urged the Company to continue its steady pace stating, “a thorough evaluation of the pilot should be performed before moving to program status.” MPSC Staff Opening Br. at 132.

Each of the Company’s and Staff’s stated approaches above can coexist with the CEO’s recommendations. CEO Witness Volkmann’s proposed framework would create criteria for the application of non-conventional solutions and identify chokepoints on the grid where these solutions can be deployed. In no way do the CEO suggest, as MPSC Staff seems to argue, that the Company cut corners or take risks in transitioning pilots to programs. However, at the same time, the CEO recognize that DTE is at a critical point in its distribution grid upgrades. The Company proposes significant spending, much of it necessary, but the more effectively the Company can deploy and integrate DERs and other non-conventional solutions into its system, the more the Company will maximize grid value and host the distribution grid of the future. The CEO are not recommending a change in results or how the Company evaluates its pilots as much as a framework that streamlines the process of evaluating pilots, determines whether they should move from pilot to program, and identifies the likely places on the grid where the Company can effectively deploy these solutions.

In addition to the Company’s hesitance to adopt the CEO’s recommendations regarding non-conventional solutions, it also argues that one program Witness Volkmann recommended would violate Commission precedent. Witness Volkmann argued that virtual power plants or VPPs, could be effectively deployed by DTE to “balance electricity demand and supply and provide utility-scale and localized grid services.” Volkmann Direct, 6 TR 3257. In its opening brief, DTE conflated Volkmann’s recommendation regarding VPPs with one type of VPP,

residential demand response aggregation. The Company argued that it cannot deploy such a solution “because DR aggregation is currently banned in Michigan.” DTE Opening Br. at 175.

However, DTE’s argument misinterprets the scope of the CEO’s proposal. While it is correct that Commission precedent currently bans residential DR aggregation for participation in wholesale markets, this restriction does not apply to commercial demand response or utility-led programs designed to address utility grid needs. The CEO’s proposal does not seek to aggregate residential DR resources for wholesale market participation. Instead, it advocates for a utility-driven Virtual Power Plant (VPP) pilot or demonstration project that would leverage distributed energy resources (DERs) to improve grid resilience and manage peak load. This approach would allow DTE to utilize DERs to meet its own operational requirements without involving wholesale market aggregation, thereby aligning with Commission precedent. That being said, the CEO also recommend that the Commission order DTE to study and pilot VPP programs operated by third parties. CEO Opening Br. at 21.

The Commission recently reaffirmed its commitment to studying and deploying DERs and other technologies to benefit the grid. Case No. U-20147, Final Order at 140 (Sept. 26, 2024). The CEO’s recommendation fits directly in line with that Commission directive. By creating a non-conventional solution framework, the Company will complete the first stage of planning necessary to operationalize the grid of the future that fully leverages the value that DERs can bring to the grid.

VI. Energy Justice Encompasses More Than Reliability, and the Commission Should Order DTE to Address Other Ways EJ Customers Experience Electric Service

In testimony and again in its opening brief, the CEO discussed the importance of a full and fair consideration of equity and energy justice in utility decision-making. Kenworthy Direct, 6 TR 3195-96; CEO Opening Br. at 22-24. In particular, CEO Witness Kenworthy discussed granular

mapping and data tracking to better understand “specific information regarding aspects of the system and customer experience.” Kenworthy Direct, 6 TR 3198. Witness Kenworthy suggested the Company begin to track six specific metrics to better understand the customer experience, including: (1) average energy burden at the census block group level; (2) percentage of residential customers disconnected per census block; (3) percentage of low-income customers in each census block group that participated in one or more energy assistance programs in a year; (4) percentage of low-income customers in each census block group that participated in a payment plan; (5) percentage of residential customers in each census block group enrolled in Shutoff Protection Plan in a year; and (6) percentage of low-income residential customers in each census block group that participated in the Company’s energy efficiency program in a year. Kenworthy Direct, 6 TR 3200.

In its opening brief, the Company pushed back against calls from the CEO and DAAO to expand its EJ analysis, stating, “[a]dditional EJ analysis is similarly not needed at this time. The Company already considers EJ with respect to investments, as indicated above.” DTE Opening Br. at 331.

As the CEO stated in our opening brief, “energy justice includes more than just reliability concerns.” CEO Opening Br. at 25. While the CEO appreciate the significant progress on EJ analysis over the last several rate cases, the Commission has recognized that “more work is necessary.” Case No. U-20836, Final Order at 459 (Nov. 18, 2022). While understanding disparate reliability performance is important, especially in light of the Company’s overall poor historic reliability performance, there are several other ways that customers experience the grid. DTE must better understand the challenges low-income customers face from disconnections, barriers to enrollment in Company programs, and, especially, affordability. Simply because the Company has adequately responded to the CEO’s and others’ prior advocacy around reliability and EJ mapping

does not mean that the Company can stop pursuing equitable outcomes in other aspects of its work. The CEO restate their recommendation from our opening brief that the Commission should order the Company to expand its use of the MiEJScreen Tool to begin tracking the six additional metrics discussed above. CEO Opening Br. at 25-26.

In addition to the Company's reluctance to expand its EJ analysis, the Company and MPSC Staff each criticized CEO Witness Tan's regression analysis. DTE Opening Br. at 333; MPSC Staff Opening Br. at 176-77. For example, DTE argued that Witness Tan's regression is "inherently flawed." DTE Opening Br. at 333. However, both the Company and Staff miss the larger point around Witness Tan's analysis. The purpose of the regression analysis in this case was not to disallow investment or rebut any of the Company's claims. Instead, Witness Tan offered his testimony to demonstrate the ease of updating regression and the importance of running these analyses in rate cases rather than only in distribution grid plans. The rate case is where investment decisions that impact EJ communities are made and the Company, with support of the CEO and Staff, should develop a basic regression analysis outside of this case to be introduced in the next rate case and updated and improved in each subsequent case.

Lastly, the CEO note that we support DAAO's recommendations regarding a comprehensive solution to the affordability issues in the Company's territory. Kenworthy Rebuttal, 6 TR 3223. As noted in the CEO's opening brief, CEO Witness Kenworthy proposed two alternate solutions for the Commission to consider when ordering the Company to evaluate more comprehensive affordability solutions, including the ComEd Low-Income Discount Rate and the Xcel Automatic Bill Credit Program.¹ Kenworthy Rebuttal, 6 TR 3224-5. In addition to supporting DAAO on a more holistic affordability solution, the CEO also support the DAAO recommendation

¹ The Minnesota Public Utilities Commission approved the automatic bill credit petition on October 10, 2024. https://minnesotapuc.granicus.com/player/clip/2430?view_id=2&redirect=true

that the Commission order the Company to “track and provide information on the affordability gap in its service territory.” DAAO Opening Br. at 94. The CEO note that this recommendation and DAAO’s work around the affordability gap reflects prior testimony from the CEO in the Company’s 2023 IRP.² The CEO agree that the Company must invest significantly in its distribution grid to improve reliability and modernize the grid, but that spending must be coupled with better solutions for mitigating severe rate impacts for low-income customers.

VII. The Commission Should Approve DTE’s Proposed EV Spending and Order Expansion of DTE’s Rebate Offering

In testimony and in briefing, the Company proposed to increase its spending on electric vehicle infrastructure programs in alignment with its recently filed Transportation Electrification Plan (TEP). DTE Opening Br. at 284-288. The Company supported its proposal with a benefit-cost analysis (BCA), which, despite conservatively estimating the revenue from new electric load, still found significant net positive benefit to ratepayers. DTE Opening Br. at 290.

MPSC Staff and the Attorney General each proposed disallowances for the Company’s proposed spending. MPSC Staff Opening Br. at 9-13; AG Opening BR. at 41-42.

The Commission should reject these proposed disallowances because they lack evidentiary support and because of the clear benefits associated with encouraging EV adoption and creating downward pressure on rates. *See* CEO Opening Br. at 31-32. In addition, since costs will only be recovered if there is customer demand for the company’s EV rebate programs, there is minimal risk to ratepayers should the company’s forecasts be optimistic. In fact, given the positive net benefits of the company’s proposed programs, there is more risk to ratepayers from arbitrarily limiting spending on these programs.

² Docket No. U-21193, Direct Testimony of Boris Lukanov on Behalf of Environmental Law & Policy Center, The Ecology Center, Union of Concerned Scientists, and Vote Solar. p. 3. Available at: <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/0688y00000789BIAAI>

The CEO also support Intervenor arguments for expanded rebate offerings. Specifically, the CEO support EVGo's argument for the expansion of community and destination charger rebates. EVGo Opening Br. at 14-16. In its opening brief, EVGo pointed out that stakeholders in the TEP process did not argue to exclude community charging, and, in fact, several recommended in favor of the expansion of community charging. *Id.* The company does not contest this finding, arguing simply that it remains committed to providing support for "35% of the forecasted on-route public charger deployment and rural on-route subsegment, and 35% in the other on-route areas." DTE Opening Brief at 285-286.

Further, the CEO support Intervenor arguments to expand rebate offerings for workplace and level 2 public charging. MEIU Opening Br. at 27. DTE's arguments against expansion, including these rebate offerings, reflect a lower prioritization rather than a lack of actual need. DTE Opening Br. at 289. Given the significant net positive benefits in the Company's admittedly conservative BCA, there is more potential benefit to including these additional segments in DTE's EV rebate programs than arbitrarily cutting them from eligibility. As MEIU states in its brief, this is "penny-wise but pound-foolish" and will likely lead to fewer or delayed benefits to customers and to ratepayers alike. MEIU Opening Br. at 29. The Commission should thus Order the Company to expand eligibility to include these categories and either increase the budget for these programs or seek additional rate recovery in its next rate case.

VIII. Conclusion

The CEO renew the arguments and requests for relief made in their Opening Brief, and respectfully assert that none of the arguments made by the Company change the CEO's positions or recommendations.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Dan Abrams', written over a horizontal line.

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Dated: October 23, 2024

STATE OF MICHIGAN
MICHIGAN PUBLIC SERVICE COMMISSION

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accounting authority.)

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing *Reply Brief on Behalf of The Ecology Center, The Environmental Law & Policy Center, The Union of Concerned Scientists, and Vote Solar* was served by electronic mail upon the following Parties of Record, this 23rd day of October 2024.

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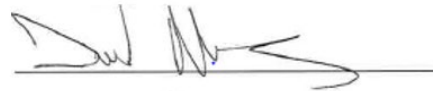
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