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October 24, 2024

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

RE: In the matter, on the Commission's own motion, to open a docket for certain regulated electric utilities to file their five-year distribution investment and maintenance plans and for other related, uncontested matters.
MPSC Case No: U-20147

Dear Ms. Felice:

Attached for electronic filing in the above referenced matter are the DTE Electric's Comments on the Commission Staff's distribution grid plan strawman proposal and the draft protective Order in Case No. U-20147. Also attached is the Proof of Service.

Very truly yours,

Andrea E. Hayden

AEH/cdm
Enclosure

cc: Service List



**DTE Electric’s comments on the Commission Staff’s distribution grid plan strawman proposal
and the draft protective Order in Case No. U-20147**

I. Introduction

On September 26, 2024, the Michigan Public Commission (“Commission” or “MPSC”), issued an Order in Case No. U-20147 in response to the updated 5-year electric distribution system investment and maintenance plans filed over the preceding year, and stakeholders’ comments in the case. In the Order, the Commission sought comments from interested parties on a straw proposal from the MPSC Staff that is intended to clarify and improve the distribution plan process. In addition to other aspects of the straw proposal, the MPSC Staff proposes that distribution plans should be filed every three years, with annual updates, and to establish pre-distribution filing meetings between utilities and stakeholders for input before filing the plans. Additionally, the Commission directed the Staff to develop a protective order for use by the utilities in connection with the filing or provision of confidential information in these proceedings.

The Company appreciates the time and effort the Commission took to provide feedback on the 2023 iteration of DTE Electric’s Distribution Grid Plan (DGP) in Case No. U-20174 and values the constructive comments from the Commission and other stakeholders. This feedback is a key input to the Company’s ongoing effort to improve future distribution grid plans to support the needs of our customers and stakeholders. The Company looks forward to continuing to engage with MPSC Staff and other stakeholders in further discussions on the straw proposal and the protective order proposal.

DTE Electric (DTEE) offers commentary on the MPSC Staff’s straw proposal requirements and the protective order on the following topics:

- Safety Incidents Reporting
- Streetlight and Community Lighting Operation Strategy
- Protective Order

I. Safety Incidents Reporting

The MPSC Staff’s straw proposal states that distribution plans should provide a data-based review of both current and recent historical system characteristics to offer basis and context. The Company offers commentary on the following:

- **Staff** – utilities to provide data on “historical safety incidents involving electric facilities,¹ including: (1) date, (2) location, (3) electric system voltage, and (4) affiliation (Company, Contractor, or Public)”. (September 26, 2024 MPSC Straw Proposal Exhibit A)

Response – The Company reports instances of fatalities and “serious injury”² to the Commission. The Staff’s proposal is exceptionally broad and undefined requiring “safety incidents involving electric facilities” be included in a utility’s DGP. It is not clear if the proposal seeks to expand the definition of “serious injury” in R 460.3102 and the reporting requirements in R 460.3102. More importantly it is unclear what purpose this data would serve within a utility’s distribution grid plan. These injuries often have no relationship to the integrity of the distribution system or the improvements made to it, for example a car accident that breaks a pole and results in a serious injury is not relevant and should not be included in reporting for this purpose.

¹Accidents reported in accordance with R 460.3804 of the Technical Standards for Electric Service.

² “Serious Injury” is defined in R 460.3102 of the Technical Standards for Electric Service.

II. Streetlight and Community Lighting Operation Strategy

In the Straw proposal, MPSC Staff recommended that utilities include a discussion of the operation and investment strategy of various operations programs.

- **Staff** recommend utilities include “[a] brief discussion or summary of the utility’s current operation strategy including, but not limited to: [...] Streetlight/community lighting management, including investment strategy, operations strategy, and light pollution mitigation efforts.” (September 26, 2024 MPSC Straw Proposal Exhibit A)

Response – The Company does not believe it is warranted or necessary for Community Lighting to be included in its DGP for two key reasons. First, Community (street) Lighting assets are separate and distinct and operate independently from DTE Electric Distribution Operations. Operating independently in this context means that the integrity (i.e. whether they are in working order or not) of the dedicated streetlighting circuits, in no way impacts the operating integrity or reliability of the Company’s distribution assets. The integrity of distribution assets does however, impact the reliability of our street lighting assets (i.e. if there is a power outage in a community with municipal lights they will not operate until the power outage has been restored. In other words, there is a one-way reliability relationship, distribution issues could impact lighting service, however, failure or service interruptions specific to lighting assets will not impact operational integrity of the distribution system. Underscoring this point, the focus of the DGP is specific to distribution investments and not street lighting. The Company defines the composition of the distribution grid and customers impacted (filed in Case No. U-20147) as including “approximately 31,000 miles of overhead distribution lines and 14,500 miles of underground distribution lines. Its service territory encompasses 7,600 square miles and includes approximately 2.3 million residential, commercial and industrial customers.” Second, Community Lighting from a cost of service/rate design perspective, maintains its own rate base and a separate set of projected capital and O&M expenditures.

III. Protective Order

On October 10, 2024, as directed by the Commission's September 26, 2024 Order, Staff filed a proposed protective order for use by the utilities in connection with filing or provision of confidential information in Case No. U-20147. The protective order proposal outlines how protected material, which is confidential information filed by any utilities in their distribution investment plans, will be handled and protected.

The Company cannot consent to any provision that would compromise its right to object to production of Critical Energy Infrastructure Information which will compromise the security of its facilities or information which would compromise commercial interests of the Company or third parties. It is the Company's intention to continue to be transparent and anticipates that evaluation models such as the Global Prioritization Model and Distribution Reliability Model will be able to be made available with appropriate protections.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,)
to open a docket for certain regulated electric)
utilities to file their five-year distribution investment)
and maintenance plans and for other related,)
uncontested matters.)
_____)

Case No. U-20147

PROOF OF SERVICE

CAITLIN D. MYERS states that on October 24, 2024, she served a copy of DTE Electric's Comments in the above caption matter, via electronic mail, upon the persons listed on the attached service list.

CAITLIN D. MYERS

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