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October 24, 2024

Ms. Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 West Saginaw Highway, 3rd Floor
Lansing, MI 48917

Re: Case No. U-20147

Dear Ms. Felice:

Enclosed for electronic filing in the above-referenced matter are Indiana Michigan Power Company's Supplemental Comments On Michigan Public Service Commission Staff's Five Year Distribution Plan Straw Proposal.

If you have any questions, please contact me.

Sincerely,

Dykema Gossett PLLC

Richard J. Aaron

4813-9011-1919.1

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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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) Case No. U-20147
and maintenance plans and for other related,)
uncontested matters.)

)

**INDIANA MICHIGAN POWER COMPANY’S SUPPLEMENTAL COMMENTS ON
MICHIGAN PUBLIC SERVICE COMMISSION STAFF’S FIVE YEAR DISTRIBUTION
PLAN STRAW PROPOSAL**

Indiana Michigan Power Company (I&M or the Company) has filed joint utility comments as part of the Michigan Electric and Gas Association (MEGA) in response to the Michigan Public Service Commission’s (MPSC or Commission) invitation for feedback on the Distribution Plan Straw Proposal. In addition to the joint utility MEGA comments, I&M submits these supplemental comments.

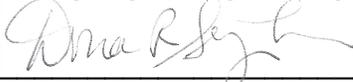
In the Distribution Plan Straw Proposal, Section IV(e) Resilience Approach and Planning, the MPSC Staff is recommending a separate resilience approach and planning section which starts with a vulnerability assessment. As an initial comment, I&M requests more guidance from MPSC Staff regarding their expectations for vulnerability assessments, as well as clarity on what constitutes a "vulnerability assessment," as it is unclear to I&M what Staff’s expectations are regarding resilience program initiatives.

Once defined, I&M requests the ability to subsequently comment on this section after gaining a better understanding of expectations.

In addition, in Section IV(e)(iii), Staff is recommending rate impacts related to resilience approach and planning be included as part of this section. I&M considers many factors in determining the value and priority of distribution projects, while also ensuring safety and maintaining reliability, as part of its distribution planning process. Many of these factors may change over time, especially in the projected outer years. With potential changes in assumptions, resulting rate impacts may also change, altering any potential benefit of a rate analysis. Furthermore, distribution investments related to resilience initiatives are only a subpart of the overall rate impact to customers. I&M provides rate impacts as part of a base rate case, which includes a Distribution Management Plan that closely aligns with I&M's Five-Year Distribution Plan. Therefore, I&M finds a rate analysis, that only provides a small piece of a much larger picture, and one that is likely to change, to be unnecessary and not helpful.

Respectfully submitted,

INDIANA MICHIGAN POWER COMPANY

By 

Dona R. Seger-Lawson
Director, I&M Regulatory Services