

November 15, 2024

Ms. Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 West Saginaw Highway
Post Office Box 30221
Lansing, MI 48909

RE: MPSC Case No. U-21305 – In the matter, on the Commission’s own motion, to investigate, audit, and review the methods employed for Consumers Energy Company and DTE Electric Company to secure good electric service and ensure the safety of the public pursuant to MCL 460.555 and MCL 460.556.

Dear Ms. Felice:

Enclosed for electronic filing in the above-captioned case, please find the **Comments of Consumers Energy Company**. This is a paperless filing and is therefore being filed only in PDF.

Sincerely,

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cc: Steven Hughey, MPSC
Ryan Wilson, MPSC

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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to investigate, audit, and review the methods)
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Case No. U-21305

COMMENTS OF CONSUMERS ENERGY COMPANY

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COMMENTS OF CONSUMERS ENERGY COMPANY

I. INTRODUCTION

The Michigan Public Service Commission (“MPSC” or the “Commission”) opened this case in October 2022 after severe weather in August of that year caused many long power outages, downed energized utility lines across the state, and threatened public safety. In its order opening this case, the Commission instructed its Staff (“Staff”) to hire a consultant to audit the electric distribution systems of Consumers Energy Company (“Consumers Energy” or “the Company”) and DTE Electric Company (“DTE”). The Commission directed the audit to consist of physical inspection of the utilities’ distribution system infrastructure and investigation of the utilities’ organization, staffing, and resources used to operate and maintain their distribution systems and restore power when service is interrupted by severe weather. MPSC Case No. U-21305, October 5, 2022 Order, pages 2-3. The Commission recognized that recent distribution planning has “produced some effective measures, particularly in the area of vegetation management,” but it noted concern with recent System Average Interruption Frequency Index (“SAIFI”), System Average Interruption Duration Index (“SAIDI”), and Customers Experiencing Multiple Interruptions (“CEMI”) scores. *Id.* at 3-4. These metrics measure how often customers lose power and how long they are without it, identifying those customers who lose power repeatedly and are

without it the longest.

In a report filed on November 4, 2022 in response to the Commission's order, Consumers Energy committed to work with the auditor as it completes a physical audit and an audit of the Company's programs and processes. See November 4, 2022 Report on Good Electric Service and Public Safety, page 63. This is exactly what the Company has done. Since Staff hired the Liberty Consulting Group ("Liberty") to audit the two utilities' distribution systems, the Company has worked with Liberty to promptly answer all of its approximately 450 written questions and transparently meet with Liberty in 40 interviews and many other instances. The Company also arranged Liberty's physical inspection and accompanied Liberty as its auditors inspected 144 pole locations, 77 substations, the Cadillac headquarters, and the Jackson distribution center.

Through all of this, Consumers Energy was so responsive that Liberty complimented the Company (and DTE as well), when presenting its audit reports to the Commission, for diligently providing Liberty with everything it needed for the audit. Liberty likewise had many positive things to say about the Company's leadership team managing the distribution system and its distribution system itself. Naturally, Liberty also had recommendations for the Company. Just as Consumers Energy diligently worked with Liberty during the audit, the Company is committed to efficient, effective, and timely action in response to recommendations that require solutions. In these comments, the Company describes its plans to address each and every one that merits attention. Indeed, the Company is already working to carry out many of these recommendations.

Liberty recommended it, and the Company is delivering. For example, Liberty recommended that the Company improve its outage prediction accuracy and consolidate its outage prediction and weather forecasting vendors, and the Company has already issued Requests for Proposals ("RFPs") to accomplish this. Liberty also asked when the Company will be able to

secure wire downs within the required response times for metropolitan and non-metropolitan areas (consistent with the Commission’s service quality standards), and it recommended that, once this goal is set, the Company work toward it with accountability. The Company is answering the call. It estimates that it will improve its wire down performance 12% this year (above the 2023 performance improvements it already achieved) and, by 2025, will meet this compliance requirement. The Company, of course, was already persistently pushing toward this goal before Liberty recommended it, but this is nonetheless another example of concrete steps the Company is already taking to deliver on its commitment to worldclass, hometown service for customers.

Although the Company agrees with many of Liberty’s conclusions and recommendations and is working to fulfill them, there are findings the Company disagrees with too, as is to be expected in an audit of this scope and size. An auditor who has only a snapshot view of a utility’s system, even a detailed snapshot, cannot always see the full picture. This case is no exception. Liberty was right about many things, but it was wrong about others. Chief among them is Liberty’s conclusion that the Company’s historic capital investments have not significantly improved reliability, as well as its proposal to prolong the pace of the Company’s reliability investments, its recommendation to drastically reduce the length of the Company’s line clearing cycle, and its finding questioning the Company’s plan to replace open wire secondary. In these comments, the Company unravels the reasoning behind these findings, balances the benefits and burdens of these recommendations, and identifies flaws:

1. Interpreting SAIDI data, Liberty appeared to conclude that the Company’s recent investments in its system have not had a meaningful impact on SAIDI performance. See Liberty’s Report, Part I, page 71. But when using a proper baseline, SAIDI performance has improved significantly over the past decade. And last year marked the second year of a two-year SAIDI trend in the right direction. Although there is more work to do, the recent strides in the face of increasing wind speeds represent promising progress and show that the Company’s investments are paying off for customers.

2. Liberty questioned the pace of the Company’s proposed reliability investments in its Electric Distribution Infrastructure Investment Plan (“EDIIP” or “Reliability Roadmap”) over the next five years and recommended that the Company consider a seven-to-ten-year investment plan. The Company will perform this analysis in its next Reliability Roadmap filing, but at least one cost of waiting is already self-evident – the Company is on pace to reach its goal of second quartile reliability performance by 2029, and prolonging its investments will delay these benefits.
3. Liberty recommended that the Company aggressively expand and accelerate its low voltage distribution (“LVD”) line clearing glidepath to achieve, by 2028, a four-to-five-year line clearing cycle. Although the Company continues to weigh this recommendation, the Company’s initial analysis does not support as significant a reduction to the Company’s line clearing cycle. The Company is also concerned about the short-term rate impact, particularly on residential customers, of the increase in operations and maintenance (“O&M”) expenses needed to fund a much shorter cycle.
4. Liberty questioned whether replacing open wire secondary on the Company’s system is worth the cost. One reason Liberty appeared to oppose the Company’s plan was its minimal SAIDI benefit, but replacing legacy open wire secondary has other benefits. Most importantly, replacing this open wire reduces the risk of the public contacting energized downed secondary wires. Beyond this critical safety concern, replacing open wire secondary will reduce outages, especially in disadvantaged communities, improve local CEMI and Customers Experiencing Lengthy Interruption Duration (“CELID”) metrics, and even facilitate employee training.

The Commission shares Consumers Energy’s interest in reliable and affordable electric service, and the Company is confident that the Commission will carefully consider the impact that Liberty’s recommendations would have on customers if adopted. To this end, the Company trusts that the Commission will consider these comments as it decides whether to adopt Liberty’s recommendations and how to partner with the Company to carry out the recommendations it does adopt.¹

¹ Consumers Energy has not addressed all of Liberty’s observations and conclusions but has responded only when it has information to share – either information about the steps the Company is taking to address a finding or information explaining why a particular finding is wrong. There were many findings that the Company agreed with and did not address. It should not be assumed, however, that silence on a particular topic is acquiescence. The Company may address additional issues if it files reply comments.

II. REPORT PART I COMMENTS

A. Electric Grid System - Observation 3: Automatic Transfer Reclosers Do Not Mask the Interruption Incident Count.

Liberty acknowledged that Automatic Transfer Recloser (“ATR”) schemes reduce customer interruptions and incrementally improve SAIDI but took the position that these schemes can mask the extent to which tree contact and equipment failures cause outages. Liberty’s Report, Part I, page 19. ATRs certainly reduce the number of customers experiencing an outage due to a particular cause, such as tree contact or equipment failure, as Liberty acknowledged, but ATRs do not eliminate outages – an outage is still present on the system. Liberty appeared to realize this, even if it was concerned that others would not, when it said that ATRs can “mask” the outage count. The Company does not agree that ATRs “mask” outage counts—i.e. conceal that trees and equipment failures are still causing outages. But whether ATRs mask outage counts is not as important as the number of customers who do not lose power when ATRs operate. ATRs are reducing customer outages; the Company’s records prove it. When ATRs operate, the Company’s records show the outage and the associated cause, although with a reduced number of associated customers interrupted.

For anyone who might question ATRs’ value, they should look no further than the Company’s outage records. Company witness Donald A. Lynn summarized the data from these records in the Company’s ongoing rate case in Figure 37 of his direct testimony:

FIGURE 37
ATR LOOP HISTORICAL RELIABILITY BENEFITS

Year	Customer-Outages Prevented	Customer-Outage-Minutes Avoided
2019	34,333	10,334,000
2020	33,172	9,131,000
2021	36,098	23,375,000
2022	63,359	18,222,000
2023	69,339	18,059,000
Total	236,301	79,121,000

The Company's proposed investment in ATRs is money well spent. As the Company also points out elsewhere in these comments, its planned future investment in ATR schemes is modest yet provides an important customer-outage prevention measure. See discussion *infra* at 31.

B. Electric Grid System - Observation 5: Fault Sensors, Fuses on Lateral Circuits, and Protective Relay Upgrades Are Incrementally Improving System SAIDI.

Liberty observed that “[c]ontinued installation of fault sensors, fuses, and protective relays should further reduce the number and duration of interruptions across Consumers’ distribution system.” Liberty’s Report, Part I, page 19. The Company agrees and appreciates Liberty’s recognition of the value of installing additional fault sensing devices, additional fuses, and improved system protection relays.

C. Construction Standards and Inspection and Maintenance Practices – Findings 2: Overhead Lines Construction Grade Clarification.

Concerning Consumers Energy’s construction standards for its overhead lines, Liberty observed that the Company has upgraded its “standard primarily from Grade C to Grade B,” Liberty’s Report, Part I, page 21, which is partially true. To be precise, the Company has changed its construction standard primarily from Grade C to Grade B only *for its high voltage distribution (“HVD”) overhead lines*. Consumers Energy still uses Grade C for its LVD overhead lines consistent with National Electric Safety Code (“NESC”) requirements.

D. Stratified Facilities Sampling – Findings 1: The Company is Addressing Pole Conditions that Liberty Found Warranted Near-Term Attention.

As part of its physical inspection of the Company’s distribution system, Liberty inspected 144 poles for condition issues, among other things. Of these 144 poles, Liberty identified only eight poles in a condition that merited short-term attention:

- Two poles that Consumers Energy should re-inspect before considering replacing;

- Five poles that should be replaced; and
- One pole with a span that should be inspected for trimming. Liberty’s Report, Part I, page 30.

As soon as the Company learned about the issues with these eight poles, it took action to remedy them. In the table below, the Company has copied Liberty’s description of each pole’s condition, along with its recommendations, see Liberty’s Report, Part I, pages 30-31, and the Company has summarized the steps it took, or plans to take, in response for each structure:

Pole #	Liberty-Assessed Condition	Liberty Comment	Company Response
0242716	Minor cracks in 1989 pole	Inspect pole	The Company included this pole in the on-cycle inspection completed after the field audit. The Company found that this pole did meet the standard for priority replacement.
0569583	Deep split in 1940 pole	Replace pole	The Company will replace this pole.
1264988	Shaft is deteriorated in 1940 pole	Inspect pole	The Company included this pole in the on-cycle inspection completed after the field audit.
0863453	Span needs trimmed	Inspect; trim as required	The Company included this pole in the on-cycle inspection completed after the field audit. The Company found that this pole did meet the standard for priority replacement.
1182242	Large deep split in 2007 pole	Replace pole	The Company has scheduled this pole for design and replacement.
1037874	Pole base has shell rot in 1939 pole	Replace pole	The Company has scheduled this pole for design and replacement.
1307060	Pole base has shell rot in 1960 pole	Replace Pole	The Company has scheduled this pole for design and replacement.
1378995	Split in 1990 pole	Replace pole	This pole was inspected by the Company; however, it does not meet the standard for priority replacement. The crack is not deep and is present for only a portion of the pole. The pole will be assessed again in two years as part of the routine cycle.

E. System Comparisons – Observation 3: Consumers Energy’s SAIDI Performance Since 2014 Has Improved, Reflecting Increases in the Company’s Capital and O&M Expenditures for Reliability.

Consumers Energy generally prefers to use a five-year average SAIDI when baselining trends over time to limit variability in year-to-year performance while maintaining consistency with Institute of Electrical and Electronics Engineers (“IEEE”) Standard 1366-2012, which defines Major Event Days (“MEDs”) based on five sequential years of daily outage minutes. See, e.g., Case No. U-20147, Consumers Energy’s Electric Distribution Infrastructure Investment Plan, September 27, 2023, page 10 n3, 36 (noting that “2018-2022 SAIDI excluding MED performance averaged 208 minutes”). Liberty, however, generally looked at year-over-year SAIDI trends in its report. See, e.g., Liberty’s Report, Part I, pages 62, 64, 70, 73, 76. With the annual variability of SAIDI, particularly all-weather SAIDI (including MEDs), looking at a single year, or even one year to the next, reveals an incomplete picture. Comparing five-year SAIDI averages smooths for weather swings and is also consistent with how Liberty viewed the Company’s expenditures. See Liberty Report’s, Part I, page 71 (comparing expenditures from 2014 through 2018 with expenditures from 2019 through 2023). Accordingly, the five-year SAIDI average in 2014 (2010 through 2014) was 222, while in 2024 (2019 through 2023) it was 203; therefore, the five-year SAIDI average in 2014 was approximately 10% higher than the five-year SAIDI average in 2024. Comparatively, the industry average second quartile and third quartile performance, as measured by IEEE, degraded by 2% and 13%, respectively, over the same periods. So, while the Company was demonstrating improvements in reliability, the industry’s similarly situated peers were unable to achieve similar gains in performance over the same period.

Liberty’s view of the Company’s historic SAIDI performance influenced many of its recommendations. Liberty appeared to conclude, based on its interpretation of SAIDI data, that the Company’s recent investments in its system have not had a meaningful impact on SAIDI

performance. See Liberty Report's, Part I, page 71. But the Company's SAIDI performance has indeed improved when measured in five-year increments to smooth for variability. Furthermore, 2023 marked the second year of a two-year SAIDI trend demonstrating improvement in reliability with two years of consistent reductions in SAIDI performance. Although the Company realizes that there is more work to do, the strides made over the past several years in the face of increasing wind speeds, as outlined in the Company's Reliability Roadmap, see MPSC Case No. U-20147, September 24, 2023 EDIIP Filing, page 19, show promising progress in the right direction.

Concerning the impact of both previously completed and forecasted investments across the Company's service territory and their impact on performance, the Company compares favorably to its peers. Liberty's own data supports this conclusion. In a chart and data table in its report, Liberty compares the Company's historical capital and O&M expense per customer with DTE, Ameren Illinois ("Ameren IL"), and Commonwealth Edison Company ("ComEd"). Liberty's Report, Part I, page 67. From 2012 to 2016, while Ameren IL's and ComEd's capital and O&M per customer increased approximately 53% (a compound annual growth rate ("CAGR") of 11%) and 73.4% (15% CAGR), respectively, the Company's capital and O&M per customer increased approximately 28% (6% CAGR). Thus, it appears that Ameren IL's and ComEd's increased investment in its system approximately 10 years ago likely contributed to Liberty's observation that these companies' SAIDI results "remained lower, and continued a downward trend across the period." Liberty Report's, Part I, page 70. In the context of the Company's proposed distribution investment plans, these historical data contradict Liberty's recommendation that the Company slow the pace of its planned investments. Furthermore, although it has increased its investment, the Company's investment levels are in line with Ameren IL and ComEd on a capital and O&M per customer basis as of 2023. *Id.* at 70.

Additionally, Liberty conceded that it was a challenge to make “apples to apples” comparisons across capital expenditure categories among its comparable company set. This challenge is more than just an accounting challenge – it is a challenge rooted in each company’s strategy to meet the needs of its customers across each one’s service territory. While distribution assets and capital and O&M programs may be similar among these utilities and other electric distribution utilities, the unique characteristics of a utility’s service territory and its customers drive the definition, scope, and pace of required capital investments and O&M expenses. As noted in the Company’s 2023 Reliability Roadmap, the Company operates and maintains a system that is approximately 30% larger than its peers on both a line-mile and square-mileage basis.

The Company’s LVD system is an extensive rural system with fewer customers per overhead distribution mile than many of its peers. See discussion *infra* at 37. Characteristics like these (e.g. service territory size, line miles, and customers per mile) must be considered in any comparable analysis, especially when analyzing the investment spending, to reach fair and meaningful conclusions. Liberty did not account for these characteristics in its analysis. See Liberty’s Report, Part I, pages 52-64 (“Consumers Energy and DTE Energy Historic Capital and O&M Summary”), pages 65-62 (“Consumers Energy and DTE Energy Historic and Projected Capital and O&M”), and pages 67-70 (“Michigan and Illinois Utilities Spending and Reliability Comparisons”). Rather, Liberty relied only on high-level, aggregated investment data.

Liberty overlooked the respective size of the Company’s and its peer utilities’ systems when outlining the effectiveness of total expenditures compared to reliability gains. Simply comparing spending to the number of customers does not fully convey the size of the system being maintained, repaired, and rebuilt to provide service to customers spread across a comparably large service territory. As Liberty noted, Consumers Energy has more poles, substations, and

transformers on its primary system than both Ameren IL and ComEd. See Liberty Report’s, Part I, page 49. In comparison to Ameren IL, who Liberty notes has the system that best resembles the Company’s, the Company has spent considerably less on its system on a per line mile basis. *Id.* at 46. From 2014 – 2018, Ameren IL spent 38% more than the Company. The Company closed the gap somewhat when it spent an equivalent amount on its system from 2019 – 2023, but over the past decade, Ameren IL spent 16% more on its system than the Company. Even when comparing the Company to less similar utilities, DTE and ComEd spent 83% and 109% more per mile from 2014 – 2023, respectively.

Comparison of Historical Capital and O&M per Line Mile

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Consumers	\$9,680	\$9,974	\$11,099	\$12,419	\$11,601	\$14,319	\$13,299	\$17,705	\$18,502	\$19,268
DTE	\$18,685	\$17,814	\$18,057	\$20,873	\$23,862	\$24,349	\$27,462	\$33,629	\$30,976	\$36,412
Ameren IL	\$12,813	\$16,111	\$15,383	\$15,805	\$15,624	\$15,658	\$16,055	\$16,426	\$16,127	\$19,715
ComEd	\$22,904	\$28,031	\$31,536	\$28,364	\$27,420	\$26,569	\$29,789	\$28,994	\$30,993	\$33,035

Liberty’s focus on SAIDI trends from year to year and on high-level investment data comparisons, although not without value, obscured the Company’s SAIDI progress and likely contributed to Liberty’s recommendation that the Company slow the pace of its planned investments in its distribution system. As explained later in these comments, even when looking at year-over-year performance, SAIDI, excluding MEDs, improved in 2020, 2022, and 2023, contradicting Liberty’s conclusion that the Company is not likely to achieve better than median industry-level SAIDI performance as planned. Liberty Report’s, Part II, page 58. Improvements in five-year SAIDI further contradict this conclusion, as the five-year average is 10% lower than

it was a decade ago.

III. REPORT PART II COMMENTS

A. Distribution System Organization, Management and Processes – Electric Operations Organization – Recommendation 1: Consumers Energy Has the Necessary Programs, Processes, and Plans in Place to Obtain Required Resources and Effectively Manage Them.

According to Liberty, potential “large increases in combined activities necessary for achieving the substantial reliability improvement targeted [in the Company’s Reliability Roadmap] will add significantly to the need for continuing to assure that program and project management organizations, methods, systems, practices, and resources keep pace with the demands that these increases will pose to performance effectiveness, efficiency, and timeliness.” Liberty Report’s, Part II, page 5. The Company is aware of the heightened challenges, which include hiring and managing resources, that it may face in executing its Reliability Roadmap. The Company understands the importance of managing these potential challenges to meet the reliability and safety expectations for its customers. Thus, the Company believes that it is aligned with the intent of this recommendation; however, the recommendation implies that the Company does not have processes and plans in place to address these challenges. This is not the case.

Liberty’s recommendation is grounded in a general concern about execution risk for large and complex projects, which any organization may face, rather than specific deficiencies related to the Company’s plans and processes. To this point, the Company highlights the following statements from Liberty:

Consumers’ planning and engineering organization, its field operations, and work management organizations work closely together to achieve timely the Company’s workload as dictated by capital and O&M projects, programs and budgets.

Staffing of managers, supervisors, engineers, and line and

substation personnel appears to be appropriate for the current workload. [Liberty Report's, Part II, page 5.]

Thus, Liberty credits the Company for appropriately identifying required resources and for closely monitoring their effectiveness and efficiency.

Furthermore, in its Reliability Roadmap, see MPSC Case No. U-20147, September 27, 2023 EDIIP Filing, the Company outlined its activities and processes that support the execution of its projects. These plans and processes include:

1. Workforce Management

- a. Resource Adequacy: The Company uses a long-range resource planning process to ensure that it has the right number of employees with the right skills to meet its workforce needs. This includes a five-year resource plan that considers demand, resource requirements, and resource availability.
- b. Training and Development: The Company has partnerships with community colleges to provide training and development opportunities for its employees. This helps to ensure that employees have the skills and knowledge necessary to perform their jobs effectively. The Company also partners with the Power for America Training Trust.
- c. Workforce Planning: The Company's workforce plan includes strategies to balance staffing growth, such as increasing efficiency, optimizing scheduling, and using the right workforce for the right response.
- d. Forecasting: The Company uses historical data and forecasting models, including external benchmarking, to predict future workforce needs. This helps to ensure that the Company has the right number of employees with the right skills to meet its future needs.

2. Material Management

- a. Supply Chain Management: The Company has a supply chain management process to ensure that it has the materials and equipment necessary to execute its capital projects. This includes strategies to mitigate supply chain risks, such as diversifying suppliers and developing alternative sourcing strategies.
- b. Inventory Management: The Company has an inventory management process to ensure that it has the right amount of materials and equipment on hand to meet its needs. This includes strategies to optimize inventory levels and reduce waste.
- c. Procurement: The Company has a procurement process to purchase the materials

and equipment necessary for its capital projects. This includes strategies to ensure that the Company gets the best possible prices and quality.

3. Project Execution Support

- a. Project Management: The Company has a project management process to plan, execute, and monitor its capital projects. This includes developing detailed project plans, tracking progress, and managing risks.
- b. Technology and Analytics: The Company uses technology and analytics to support its capital project planning and execution. This includes using data to track progress, identify risks, and optimize resource allocation.
- c. Community Engagement: The Company engages with local communities and stakeholders to get their input on capital projects. This helps to ensure that projects are aligned with community needs and priorities.

In addition to these plans and processes, the Company also has several other programs and processes in place to support the execution of its Reliability Roadmap. For example, the Company's Reliability Rally Room enables cross-functional and leadership monitoring of project execution and workforce efficiency. Additionally, the Company's safety, compliance, and environmental programs ensure that capital projects are executed safely, efficiently, and to the required standards.

In short, the Company has the necessary programs, processes, and plans in place to meet the intent of this recommendation.

B. Distribution System Organization, Management and Processes – Planning – Recommendation 2: The Company Considers Updated Electrification Scenarios and Their Cost Impacts when Pacing Capital Infrastructure Upgrades.

As Liberty acknowledged, the Company has adequate load forecasting and modeling processes for electrification-driven scenarios. Liberty Report's, Part II, page 11. Liberty noted that the Company uses the two-year cycles between its Reliability Roadmap filings as opportunities to update its load forecasts by refreshing its electrification scenarios and using enhanced methods and updated data. *Id.* at 12. Between these revisions, Liberty recommended

that the Company “review constantly the policy changes and market developments that may drive changes in assumptions that can affect the need for the significant investment levels at issue here.”

Id. The Company generally concurs.

The Company is mindful of load additions locally; at the transformer level; and regionally, at the circuit, substation, and HVD levels. The Company continues to engage with the Electric Power Research Institute (“EPRI”) and other industry partners to stay abreast of electrification forecasts and trends. The Company is presently exploring how to best use the commercial and industrial electric vehicle charging data provided by EPRI to prepare for fleet electrification in a manner that balances speed of infrastructure upgrades with cost impacts. The Company will explain in its next published distribution plan in Case No. U-20147 the efforts it has taken and will take to accomplish this.

C. **Distribution System Organization, Management and Processes – Asset Management – Recommendation 3: The Company Is Enhancing its Distribution Asset Management Strategy, with Agile Leadership, Consistent with Liberty’s Recommendation.**

Through this recommendation, Liberty encouraged the Company to consider a new director-level leadership position that will promote a unified, programmatic approach to distribution asset management and be accountable for enterprise-wide decisions. Liberty Report’s, Part II, pages 15-16. The goals of this recommendation are to drive consistency across programs and efficiencies across the various functions impacting distribution asset management. Ensuring that the Company has the appropriate oversight and governance for distribution asset management activities advances these goals. While the Company understands that the recommendation calls for the Company to “continue to assess the merits” of this leadership position, Liberty Report’s, Part II, page 15, the Company’s current leadership structure already empowers it to achieve these goals. The Company currently has a Vice President responsible for all distribution assets

supported by one Executive Director responsible for LVD assets and another Executive Director responsible for HVD and Substation assets – positions well suited to provide prudent oversight and control of all distribution asset management related activities.

As Liberty observed, the Company is currently enhancing its distribution asset management processes and capabilities, which includes integrating and implementing existing and new tools and methods to comprehensively address asset management needs across LVD, HVD, and substation assets and teams. Other recent initiatives further enhance the Company’s ability to assess its asset investments and the risks they mitigate. The Company agrees with Liberty that the asset management program enhancements underway “have brought consistency of execution in many important respects” to the Company’s asset management strategy. Liberty Report’s, Part II, page 15.

The Company is in the early phases of its journey to enhance its distribution asset management strategy. As such, the Company’s primary focus is on completing many ongoing improvements in its current plan without introducing significant changes, like a new leadership position, to its plan. This focus is aligned with Liberty’s assessment that “the most important things Consumers can do to move its program ahead is to complete and stabilize the changes underway.” Liberty Report’s, Part II, page 15. One change underway, as Liberty noted, is a new asset repository for distribution assets. Another change that Liberty noted is the Company’s plan to use an asset investment planning software application called Copperleaf to support value-based decision making, which will enable the Company to quantify the value that assets add to the distribution system.

The Company has leaders who are managing its assets strategically, overseeing well-organized teams using proven processes and procedures. These leaders are monitoring the

Company's progress implementing the Copperleaf application, identifying potential areas of improvement, and recommending potential changes to its plan. Next year (2025) will be a transition year for Copperleaf when it will be run in parallel with the Company's current investment decision-making processes to identify areas of improvement. This transition will last until 2026 when Copperleaf will be fully launched. Once Copperleaf and other asset management enhancements are securely in place, the Company may be in a better position to consider a new director-level leadership position to oversee distribution assets. Liberty recognized that successfully transitioning to Copperleaf and completing other enhancements underway should be the Company's first priority, after which the Company can consider Liberty's recommended organizational changes:

It will take some time to enhance and unitize specific elements of asset management. When those stabilize and have reached a level of maturity consistent with the system as it is expanding and changing to improve reliability, we recommend revisiting the alternative of moving to an organization made responsible and accountable for asset management program design, execution, and development to promote continuous program improvement. [Liberty Report's, Part II, pages 15-16.]

As the Company continues to enhance its distribution asset management strategy and achieve its goals, it will also continue to conduct benchmarking with peer utilities. This benchmarking will focus on peer utilities with processes and technologies, like Copperleaf, similar to the Company's asset management strategy. The Company intends to identify distribution asset management best practices across a variety of areas, including asset management tools, technologies, capabilities, and processes, while also evaluating organizational structures and approaches to operating governance. The Company plans to leverage these findings from other utilities to enhance its vision and planning for the future of its distribution asset management program.

In sum, the Company's plans are aligned with Liberty's recommendation in many respects, but creating a new director-level leadership position at this pivotal moment in the Company's asset management plans could divert attention away from these plans. Liberty recognized this. Moreover, the Company's existing culture and organizational structure will effectively enable the Company to carry out its distribution asset management plan in the near term. The Company has capable and dedicated leaders, overseeing well-organized teams, who are committed to transitioning to the Copperleaf application, which is a core component of the Company's distribution asset management enhancements. In the meantime, they are benchmarking the Company's performance against peer utilities to identify areas of improvement and potential future changes to its distribution asset management strategy, one of which may be creating a director-level position for distribution asset management.

D. Distribution System Organization, Management and Processes – Inspection and Maintenance – Recommendation 4: The Company will Reinstate Ground-Line Inspection of LVD Poles on a Cyclical Basis as Recommended.

After noting that Consumers Energy no longer tests pole strength through boring on its LVD system, Liberty said that reinstating this practice will “restore greater reliability to the process for identifying” weak poles that need replacing. Liberty Report's, Part II, page 30. Although the Company does not agree with all the conclusions that led to this recommendation, boring, when properly performed, can be a valuable technique to complement the Company's already robust two-year visual inspection program. The recent move to a two-year visual inspection cycle has significantly improved reliability by allowing the Company to identify and replace defective equipment, including poles, before the equipment fails. Adding boring to the Company's LVD inspection repertoire will further improve reliability, which is why the Company supports this recommendation.

While the Company accepts the recommendation, it clarifies that Liberty appears to have overstated the Company's LVD pole rejection rates. As Liberty found, the Company identified 3,758 LVD poles for replacement during its full two-year visual inspection program. See Liberty Report's, Part II, page 21. This represents 0.3% of its 1.1 million LVD primary poles, which is less than the 3% to 4% rejection rate that Liberty said was more common in the industry.

A visual inspection process cannot definitively reveal a pole's interior quality or expose all internal decay, but it is nonetheless a strong program, as Liberty acknowledged. See Liberty Report's, Part II, page 15 ("The Company employs inspection and maintenance cycles and contents that we found strong, save for an aspect of pole inspections [i.e., the lack of bore testing]."). The Company, therefore, does not intend to abandon its two-year visual inspection cycle – instead, groundline inspections will supplement its existing inspection practices.

The Company will initiate a groundline inspection program on a planned 12-year cycle, inspecting approximately 125,000 poles each year, consistent with its Reliability Roadmap plans. See MPSC Case No. U-21047, September 27, 2023 EDIIP Filing, page 70. Over the 12-year cycle, using Liberty's experience, the Company could expect to replace 5,000 poles per year on average. However, considering the Company has not recently performed this level of investigation into its poles, the Company is likely to inspect more higher risk poles earlier in the program. As a result, replacement rates in the early years could be expected to exceed 5,000 poles per year, based solely on groundline inspections.

The Company proposes to begin the groundline inspections in 2025, after onboarding a qualified contractor to perform the work. A minimum of 50,000 poles are planned to be inspected in 2025, though if time and capabilities permit, up to 125,000 poles would be inspected. Then, in 2026, the Company would begin replacing poles rejected in 2025 based on the groundline

inspections. The Company notes that cost recovery approval in future rate cases is necessary to implement this level of inspection and capital replacement work. Additionally, the Company's next Reliability Roadmap filing in Case No. U-20147 will align with these updated plans. Approving and funding the Company's plans, inspired by Liberty's findings, will further strengthen the Company's LVD system.

E. Distribution System Organization, Management and Processes – Inspection and Maintenance – Recommendation 5: The Company Agrees to Cease Plans to Replace LVD Poles Based on Age.

Liberty recommended that the Company “[a]bandon plans to replace LVD poles on the basis of age.” Liberty Report's, Part II, page 30. The Company accepts this recommendation and will not replace poles based solely on age. The Company will update future distribution plans filed in Case No. U-20147 to eliminate the references to LVD pole replacement plans conducted solely on the basis of age.

To address pole deterioration, the Company will continue its visual inspection program and initiate a groundline inspection cycle. See discussion *supra*, pages 18-20.

F. Distribution System Organization, Management and Processes – Operations – Recommendations 6 and 7: The Company Effectively Deploys Staff in the Field and is Constantly Evaluating the Staffing Level and Performance of Staff at its Headquarters.

Liberty's intent for these recommendations is for the Company to evaluate multiple resourcing scenarios to identify potential reduction options for non-productive time contribution to outage durations. Liberty's Report, Part II, pages 35-38. While agreeing with the intent of these recommendations, Liberty's recommendations mistakenly imply that the Company does not evaluate resourcing needs in the manner it described. The Company's current analysis processes and capabilities meet the recommendations' intent.

Liberty did not fully explain the Company's field staffing model and dispatching process.

The Company's field staffing model and dispatching process consists of the following order of engagement:

1. Electric Service Workers ("ESWs") – ESWs are the Company's primary means to respond to reactive maintenance work, and as Liberty noted, the Company has assigned ESWs across the Company's 30 work headquarters. ESWs are the first means for responding to outages.
2. Local Line Crews – Line crews consist of internal Company crews that are assigned to the Company's headquarters locations to perform a variety of work, including reactive maintenance work. When ESWs are unavailable to respond to an outage event within a headquarters location, the Company will use these line crews to respond to an outage.
3. ESWs and Line Crews from Other Headquarters and Zonal Contractor Crews – When local resources (ESWs and local line crews) are unavailable, the Company will call on resources from other headquarters locations or zonal contractor crews to respond to an outage.

The Company's Control Room and field leaders can see the resources available to them within and outside each headquarters location. This information, combined with the severity of the outage (i.e. caused by a storm or localized event) and the Company's defined dispatching process will drive resource dispatching needs. As noted in the Audit Report, the Company's Outage Management System ("OMS") and Advanced Distribution Management System ("ADMS") upgrades should improve job creation and dispatching contribution to non-productive time performance. The Company also has implemented other recent changes in line with a 2022 consultant study, such as a contract modification for line crews to enable greater on-call storm resource availability, which will further improve job creation and dispatching performance.

Specific to Recommendations 6 and 7, the Company is constantly evaluating the staffing level and performance of its ESWs and line crews assigned to headquarters locations. Through Weekly Operating Reviews ("WORs"), Monthly Operating Reviews ("MORs"), and the Company's Reliability Rally Room, the Company consistently analyzes non-productive time to identify areas of improvement and develop strategies to minimize non-productive time. Further,

the Company routinely evaluates ESWs and line crew staffing levels based on an analysis of factors such as CAIDI and wire-down performance, emergent work order count, standard work orders, non-productive time, and costs. This potentially includes changing the staffing level of ESWs and line crews assigned to headquarters locations when analyses of these factors and leadership decision-making indicates that it is prudent.

Specific to Recommendation 7, Liberty’s recommendation is too narrowly focused on ESWs. The Company uses line crews assigned within and outside of a headquarters location to respond to reactive maintenance needs. By planning for and utilizing resources beyond locally assigned ESWs, the Company can prudently manage resources and costs to meet customer needs.

Therefore, the Company believes that it has regular and comprehensive processes in place to track, manage, and minimize crew non-productive time and make staffing level changes as necessary across the Company’s headquarters locations.

G. Distribution System Organization, Management and Processes – Operations – Recommendation 8: There Is No Need to Move Core HVD Construction, Maintenance, and Operations Skills in House.

Liberty recommended that Consumers Energy consider moving some of its HVD contracted work in house. Liberty’s Report, Part II, page 38. This recommendation stemmed from Liberty’s finding that using contractors to construct, maintain, and restore HVD lines expose the Company to risk. *Id.* at 37. Specifically, after noting that the Company relies on qualified contracting crews from two separate firms, Liberty concluded that this concentration of HVD expertise in a small number of firms—along with diminishing internal experience—“creates a vulnerability.” *Id.* This led Liberty to recommend that “Consumers should, if economical and considering risk level and ability to make economic use of such a capability, provide the capability to avoid transitional disruption from the loss of expertise from its limited group of HVD contractors.” *Id.* at 38. And to determine if it is economical to move this expertise in house,

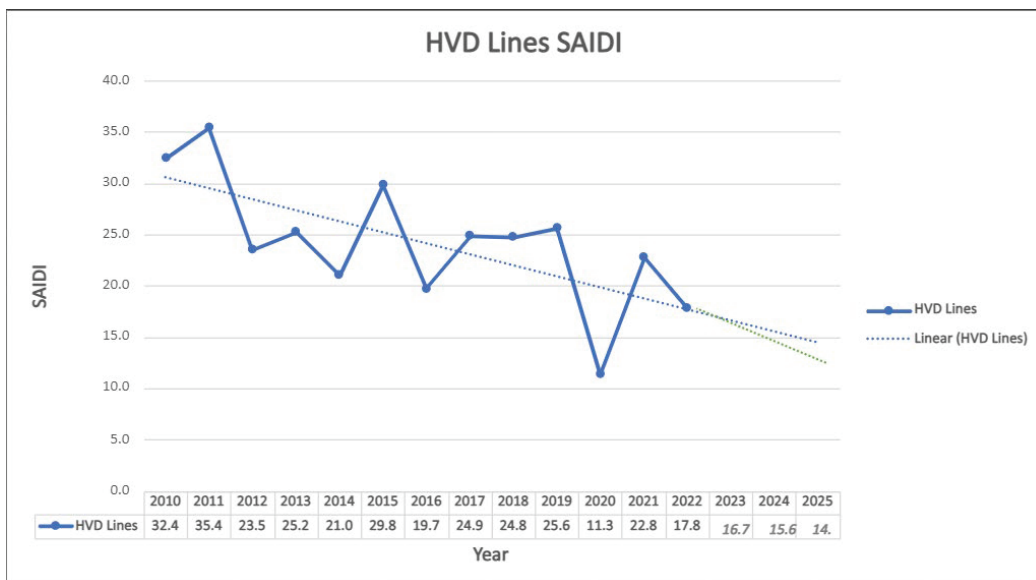
Liberty recommended that the Company study, among other things, how it could achieve this objective, as well as the transition time and costs involved.

In fact, Consumers Energy has contracts with eight National Electrical Contractors Association (“NECA”) companies to construct and maintain the HVD and associated LVD assets that Consumers Energy owns. The Company has used contracted union labor for the HVD system since 2008. The contracts include disincentives for contractors who are not able to supply labor. This model allows the Company to ramp up work when funding and workplans allow and dial it down when labor is not needed. One contract in place with a specific NECA contractor has language ensuring that crew members are able to respond to their assigned work location within 60 minutes. Under this model, the HVD system’s SAIDI performance has improved over the last several years.

HVD lines account for a smaller contribution to SAIDI than they have in the recent past. SAIDI on HVD lines fell from 35.4 minutes in 2011 to just 17.8 minutes in 2022.² This is attributable to increased investment in HVD assets over the last decade, in addition to the Company’s consistent 4.2-year clearing cycle for HVD lines.

² These SAIDI savings are specifically non-MED SAIDI savings.

HVD Lines SAIDI Performance



While Consumers Energy appreciates Liberty’s recommendation, the Company’s HVD contracting strategy is working, and there is no reason to disturb it or require a study to investigate contracting alternatives. In any event, in the past, when the Company sought to expand its internal HVD workforce and to recover costs associated with the expansion, the request was rejected.³

H. Distribution System Organization, Management and Processes – Operations – Recommendation 9: The Company will Continually Assess the Work Planning and Scheduling Resources Needed to Manage Material, Equipment, and Inventory.

Concerning Consumers Energy’s organizational structure and resources for planning and scheduling distribution work, Liberty said the “group structure and staffing [are] typical and commensurate with current work and apparently scalable to address expansion” Liberty’s Report, Part II, page 37. As for the Company’s materials and equipment inventory, Liberty found

³ In Case No. U-21690, the Company included \$27.320 million in the test year for Electric Operations LVD and HVD workforce expansion. The Commission, however, found that the Company did “not sufficiently supported the proposed test year expense of \$27.320 million for LVD/HVD workforce expansion.” MPSC Case No. U-20697, December 17, 2020 Order, page 113. Similarly, in Case No. U-20963, the Commission rejected the Company’s request for \$20.5 million for vehicles for an expanded HVD workforce in the projected test year.

“through field inspections and site visits no reason for concern about inventory quality or quantity.” *Id.* Concerning facilities, Liberty said that the Company’s facilities “have capacity for expansion sufficient to support increased work levels.” *Id.* Despite all of this, Liberty noted that “work levels planned under the EDIIP will stretch existing capabilities” and recommended that the Company “[c]ontinually assess resource levels of groups with responsibilities for work planning and scheduling and for managing material and equipment inventories.” *Id.* at 37-38.

Liberty is correct that the Company’s work planning, scheduling, inventory, and facilities are scalable to support increased work levels, and Liberty’s recommendation that the Company continue assessing its performance is well taken. During the Company’s annual planning kick off for the Reliability Roadmap, the Company will identify additional stakeholders to support work planning, scheduling, supply chain, and fleet organizations as part of the Company’s Roadmap and workforce planning processes. Assembling these stakeholders will bring additional visibility to the Company’s needs and allow it to continually assess resource levels as the Company sees increases in demand for materials and resources.

I. Distribution System Organization, Management and Processes – Forestry – Recommendation 1: The Company Plans to Reduce the Use of General “Weather” and “Unknown” Outage Cause Codes.

When restoring power and responding to outages, the Company’s field employees diagnose the outage causes using the IEEE’s standard outage cause codes. “Vegetation” and “Equipment Failure” are two common outage cause codes; “Weather” and “Unknown” are two others. Liberty observed that the “Weather” cause code “masks the actual cause of outages such as trees, lightning, or ice” Liberty’s Report, Part I, page 84. Similarly, the cause “Unknown” is not precise but nonetheless “accounts for 11 percent of total interruptions.” *Id.* Liberty found that “Weather” and “Unknown” cause codes “diminish[] the effective[ness] of the analysis of outage causes necessary to identify and optimize solutions to address them.” Liberty’s Report, Part II, page 17.

The Company agrees that reducing the use of “Weather” and “Unknown” cause codes is a potential area of improvement. More accurate outage cause reporting across the system could potentially improve restoration performance analysis and later planning. The Company is currently developing plans to address this recommendation. The two main initiatives that the Company is evaluating for 2025 are to better implement industry-wide cause code standards and to improve field employees’ outage cause entry selection as follows:

- The Company is currently evaluating operational changes to improve its adoption of the IEEE “Guide for Collecting, Categorizing, and Utilizing Information Related to Electric Power Distribution Interruption Events” in IEEE P1782/D1 – the May 2022 version – which is the standard for outage cause codes. The Company anticipates that fully adopting this standard will require changes related to training, controls, and other operational processes. Later, once these changes have time to yield results, the Company would gauge the impact of this standard against the current analysis that relies on existing outage cause codes.
- The Company is also evaluating potential training changes related to outage causal analysis and reporting for field employees. Like other utilities, most of the outage cause data comes from front-line employees in the field in response to outages. Thus, the Company plans on identifying areas of improvement and developing training and job aids to potentially improve outage reporting from field employees.

The Company agrees that having more accurate outage data, reducing “Weather” and “Unknown” outage causes specifically, could potentially improve restoration planning and performance.

J. EDIIP Reliability Programs – Reliability Goals – Recommendation 1: The Company Will Evaluate the Impact of Slowing the Pace of its Reliability Roadmap Investments, and it Asks the Commission to Wait to Make Any Decisions on the Issue Until the Analysis is Complete.

In Consumers Energy’s Reliability Roadmap, it laid out its goal to modernize its electric distribution system to safely deliver clean, affordable, and reliable power to customers throughout Michigan, with fewer and shorter power outages for customers. MPSC Case No. U-20147, September 27, 2023 EDIIP Filing, page 9. The Company’s goal is to drive improvements in

reliability performance to reach second quartile SAIDI performance by 2029. *Id.* at 36. The Company also has a strategic, long-term plan to deliver a grid where no single outage event will affect more than 100,000 customers and where no customer is without power for more than 24 hours following an outage event. *Id.* Liberty said that achieving these goals “will take extraordinary effort, have major electricity price impacts, and cannot be treated as attainable under EDIIP plans.” Liberty’s Report, Part II, page 59.

Liberty further found that “managing the work involved adds risk.” *Id.* It concluded that “a longer (e.g., seven to ten-year) duration for reaching mid-level performance is more likely to be achievable and productive of cost efficiency.” *Id.* at 59. Liberty recommended that the Company perform an analysis accounting for several specific variables, including “the amounts and pace of work and their likely impacts on work effectiveness and cost inefficiency.” *Id.* at 60. As the Company understands it, the basis for Liberty’s recommendation to study the impact of slowing the pace of investments is Liberty’s general concern about the potential execution risk and possible unrealized reliability benefits in the Company’s planned Reliability Roadmap investments. Below, the Company explains how it is managing potential execution risk and minimizing the potential for unrealized reliability benefits.

On the topic of potential execution risk, Liberty concluded that “some level of execution risk exists at the work levels of the EDIIP plans. That risk primarily concerns the cost and to some degree the time efficiency with which Consumers can execute planned work.” Liberty’s Report, Part II, page 59. While the Company agrees that any large, complex project has inherent execution risks, the Reliability Roadmap details how the Company plans to manage execution challenges, reinforced by robust documentary support. Even Liberty “did not find a discernibly wide gap between current and needed resource levels” but did find the need for “attention to identifying

resource needs to work to the levels the EDIIP plans.” Liberty’s Report, Part II, page 59. Liberty expressed a similar concern about the potential execution challenges involved in managing resources to keep pace with Reliability Roadmap investments, and the Company has already described the processes and plans that exist to successfully manage these expected execution risks. See discussion *supra* at 12-14.

The perceived reliability benefit is more nebulous. Liberty implied that the Company has not properly analyzed the reliability benefit of its investments, although it is not clear how or why it reached this conclusion. On the topic of potential unrealized reliability benefits, Liberty questioned the Company’s planning. “[I]t does not appear to us,” Liberty said, “that Consumers has fully vetted means for determining contribution to reliability performance for new initiatives or programs, greatly expanded ones, or for assessing the individual contributions of measures that work together to produce reliability improvements. Therefore, it makes sense to us to concentrate in the immediate term on assets and measures most likely to produce improved reliability performance.” Liberty’s Report, Part II, page 59.

Again, the Company agrees that any large, complex project has inherent risks, which includes the potential for unrealized reliability benefits. However, the Company has ably demonstrated in its Reliability Roadmap the reliability benefits it expects from planned projects within the EDIIP planning horizon. The Company stresses that systemwide benefits resulting from its well-targeted investments take time to materialize. Yet, the Company’s investments are already yielding systemwide SAIDI benefits, delivering improvements to SAIDI excluding MEDs in 2020, 2022, and 2023. Expanding on this further, the Company has reduced its SAIDI performance by 52 minutes from a 2021 value of 228 minutes to 2023 value of 176 minutes. See MPSC Case No. U-21585, 5 TR 923. Overall, the Company’s SAIDI predictions have been accurate within

approximately 2.5% of its forecasted predictions – proof that the Company’s forecasted reliability performance can and should be trusted.

The Company needs to close the remaining 45-minute gap between its current SAIDI performance and the goal of second quartile SAIDI performance by 2029. This requires the Company to average eight minutes of SAIDI improvement per year, which is comparable to what the Company has already achieved since 2021. The Company’s current realized reliability performance and projected reliability performance glidepath stand in stark contrast to Liberty’s conclusion that “the goal of reaching essentially the median industry level for SAIDI performance is very aggressive, given the massive efforts and large expenditure increases needed to meet it; meeting it does not appear highly likely and efforts to pursue it may lead to more costly programs, initiatives, and activities.” Liberty’s Report, Part II, page 58.

Although the Company’s latest Reliability Roadmap has more than enough detail to demonstrate that the Company can achieve its reliability goals in five years’ time and overcome the obstacles described in Liberty’s report, the Company nonetheless agrees that it is prudent to evaluate an extended timeframe from seven to ten years. This would include assessing how slowing the planned pace of investments would impact expected reliability performance and expenditures. The Company plans to conduct this additional analysis now and through 2025; the Company will leverage the forthcoming distribution plan reporting cycle and reporting guidelines from Case No. U-20147 to communicate and describe the analysis.

Although the Company agrees that it is worthwhile and prudent to *examine* a longer timeframe in which to execute its Reliability Roadmap, it does not agree that it is prudent to *commit* to an extended timeframe at this time. The Company’s position is aligned with Liberty’s statements that careful consideration must be given to the risks associated with achieving the

Company's and Michigan's reliability and safety goals. To this point, there are several factors tied to reliability and safety risks that must be considered when identifying an appropriate Reliability Roadmap timeline:

- **Severe Weather and Climate Change:** The Company's Reliability Roadmap presented substantial detailed modeling and analysis indicating that weather has been worsening and will continue to do so even under the best-case scenario of climate change.
- **Aging Infrastructure and Asset Failure:** The Company notes that is only addressing a small percentage of the LVD system in a given year, with approximately 0.3% planned in 2024. This rate is well below the pace at which the Company's system is deteriorating as indicated by the average service life of a distribution plant asset used in setting the depreciation rates in Case No. U-20849.
- **Electrification and Decarbonization:** The Company notes that the Reliability Roadmap also supports the electrification and decarbonization goals of the Company and its customers. Slowing the pace of the Company's EDIIP projects may hinder adoption of electric vehicles, heat pumps, distributed energy resources, and other technologies and assets that promote electrification and decarbonization.

The reliability and safety risks posed by increasingly severe weather, aging infrastructure, and electrification and decarbonization are objective facts that cannot be ignored and will not be mitigated without the Company's timely and focused intervention. The Commission's past statements suggest that it agrees. In Case No. U-20147, the Commission concluded that the Company's 2021 Electric Distribution Infrastructure Investment Plan – the basis for the Company's last three rate cases before the instant case – was insufficient to address reliability concerns. MPSC Case No. U-20147, September 8, 2022 Order, page 67.

Given the Commission's statements on this subject and the customers' need for fewer and shorter power outages, any deviation from the Company's current plan should come only after careful consideration of all the risks associated with proposed alternatives. To enable an informed, risk-based decision by the Commission in the interest of the Company's customers, the Company will commit to assessing the impact of slowing the pace of its Reliability Roadmap investments to seven to ten years and how this may affect expected reliability performance and expenditures. The

Company will consider the variables that Liberty asked it to evaluate and demonstrate the results of this analysis in its next formal Reliability Roadmap filing.

The Company urges the Commission to wait to make decisions, beyond approving proposed investments in the ongoing rate case, about the pace of the Company's future investments until after the Company has completed the analysis.

K. EDIIP Reliability Programs – LVD Reliability/Resiliency Measures – Conclusion 14: ATR Loops Have Low-Cost, Beneficial Uses.

Concerning Consumers Energy's planned modest investment in ATR schemes—adding approximately 30 new ATR loops per year—Liberty concluded that the Company will continue to find “sufficiently beneficial use” for the ATRs over the Reliability Roadmap planning horizon. Liberty's Report, Part II, page 71. This is particularly true “given the fairly low annual expenditures involved.” *Id.* The Company's future investment in ATR schemes is modest yet provides an important customer-outage prevention measure. The Company appreciates and supports Liberty's conclusion that the Company will find sufficiently beneficial use for them at the pace of installation contemplated.

L. EDIIP Reliability Programs – LVD Reliability/Resiliency Measures – Recommendation 2: The Company Agrees to Reevaluate its Line Clearing Cycle but Does Not Agree that a Drastic Change is Warranted.

Liberty recommended that Consumers Energy both expand and accelerate its LVD line clearing glidepath. The Company's current plan is to achieve a seven-year effective cycle and backlog elimination by year-end 2030, but Liberty recommended that the Company achieve a four- or five-year cycle, including backlog elimination, by year-end 2028. This is an aggressive proposal that would impact customer rates, particularly residential rates. Liberty's proposal merits serious consideration but must be approached with deliberate care. When evaluating line clearing cycle lengths, the Company has always acknowledged the benefits of shorter cycles—indeed, the

Company is already on a glidepath to reduce its cycles—but it has sought to balance the benefits of a shorter cycle against the costs. Unlike capital investments that are recovered over many years as capital assets are depreciated, line clearing O&M expenses must be recovered the year they are incurred and can quickly increase the Company’s revenue requirement. What’s more, increasing line clearing O&M expenses would have a disproportionate impact on residential customers. The Company is not foreclosing the possibility of a shorter line clearing cycle, as it also strives for the improved reliability that a shorter cycle promises, but the Company is weighing the benefits against the costs to find the optimal cycle.

On September 3, 2024, in Case No. U-20697, the Company submitted the Formal Optimization Analysis of Line Clearing Cycles (“Analysis”) that the MPSC ordered it to complete in its March 1, 2024 Order in Case No. U-21389. The MPSC directed Consumers Energy to conduct an analysis considering additional costs and cycle lengths:

The Commission further directs Consumers to perform a formal optimization analysis of line clearing cycles that accounts for customer costs of outages, the costs of service restoration, and the costs of line clearing, including an evaluation of shorter clearing cycles, and further agrees with MNSC that this analysis “should look with particularity to the customer costs and restoration costs associated with tree-caused outages and not at average values across all outages.” The Commission also agrees with MNSC’s argument that the company should include in this analysis the issues involving higher contractor costs, added vegetation data, and corresponding reliability concerns regarding the proposed nine-year clearing cycle for 4.8 kV circuits. . . . [MPSC Case No. U-21389, March 1, 2024 Order, pages 163-164.]

Consistent with the order, the Company explored the additional costs of maintaining shorter line clearing cycles, including a higher annual work volume, additional per diem costs for out-of-state crews, and additional line clearing administrative costs. The goal of this analysis was to pinpoint the optimal line clearing cycle length that maximizes customer benefits while appropriately minimizing total customer costs. The customer costs considered in this analysis

consisted of the tree-caused customer costs of outages, tree-caused service restoration costs, and line clearing costs. Although a four-year cycle, which was the shortest timeframe considered in the analysis, was identified as an optimal cycle when considering costs across all customer types (residential and non-residential), the Company took its analysis a step further. It also considered how line clearing and service restoration costs would be allocated to each customer type to determine if a four-year cycle would have disparate rate impacts.

The Company's refined analysis (evaluating the impact of annual line clearing and tree-caused service restoration costs that would be collected through rates from residential and non-residential customers) was revealing. It showed that residential customers bear the brunt of the line clearing and service restoration costs through rates, while non-residential customers receive a disproportionate share of the benefits. By isolating the impact on residential customers, the Company concluded a longer optimized cycle length between six and seven years most equitably distributes the costs and benefits of line clearing between residential and non-residential customers.

The Company's current overall line clearing strategy is generally aligned with this optimal cycle length of six to seven years—as the Company is on a glidepath to a seven-year effective cycle—but achieves this by balancing different line clearing cycle lengths across different voltage classes that comprise the LVD system. This strategy is shown in the table below. Detailed information on the Company's current line clearing strategy was first provided in the Company's 2020 electric rate case (Case No. U-20697) and most recently provided in the Company's ongoing electric rate case (Case No. U-21585).

Figure 1 – Line Clearing Cycle for LVD System

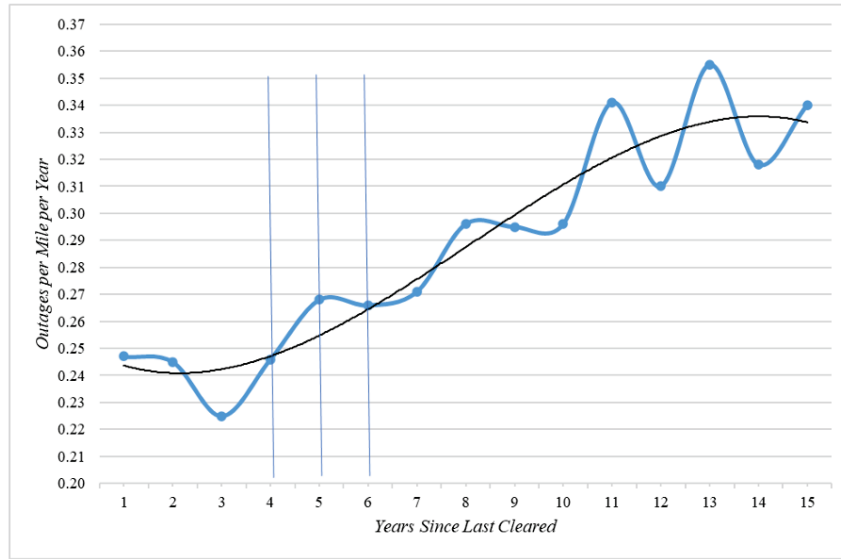
Substation Voltage Class ⁴	Approximate System Miles	Approximate Mileage Percentage of Total	14% Clearing Program – miles/year cleared	Line Clearing Cycle for Voltage Class
14.4/24.9 kV	18,000	29.5%	3,600	4 – 6 years (5-year average)
7.2/12.47 kV	10,700	17.5%	1,529	6 – 8 years (7-year average)
4.8/8.32 kV	32,300	53.0%	3,589	8 – 10 years (9-year average)

When the Company filed its analysis, Liberty was wrapping up its Audit Report and, to the Company’s knowledge, did not have an opportunity to consider the results of the Analysis in its reports. It is not clear, therefore, how the analysis might have impacted Liberty’s opinion of the Company’s line clearing strategy. Without this information, Liberty relied on its experience with other utilities, noting that this “experience finds much more typical a shorter, uniform four-year cycle for distribution voltages.” Liberty’s Report, Part II, page 42, 47-48. Liberty also commented on the reliability outcomes of shorter line clearing cycles at differing voltages, but it did not discuss several factors for lower voltages. Furthermore, as Liberty discussed and as shown in the chart below, for 14.4/24.9 kV circuits, there is a linear relationship over several years between “Outages per Mile per Year” (a proxy for reliability risk) and the “Years Since [a circuit was] Last Cleared.” This demonstrates, as Liberty found and the Company agrees, an increasing risk profile that warrants a shorter line clearing cycle to mitigate risk for 14.4/24.9 kV circuits.⁵

⁴ The Company notes that there are other voltages on the Company’s LVD system. The three voltages listed in each “Substation Voltage Class” are the primary voltage classes that constitute the vast majority of the LVD system. Any other voltages are assigned to one of these categories for line clearing treatment.

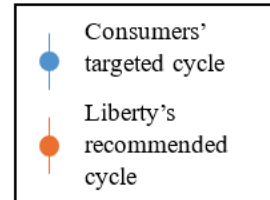
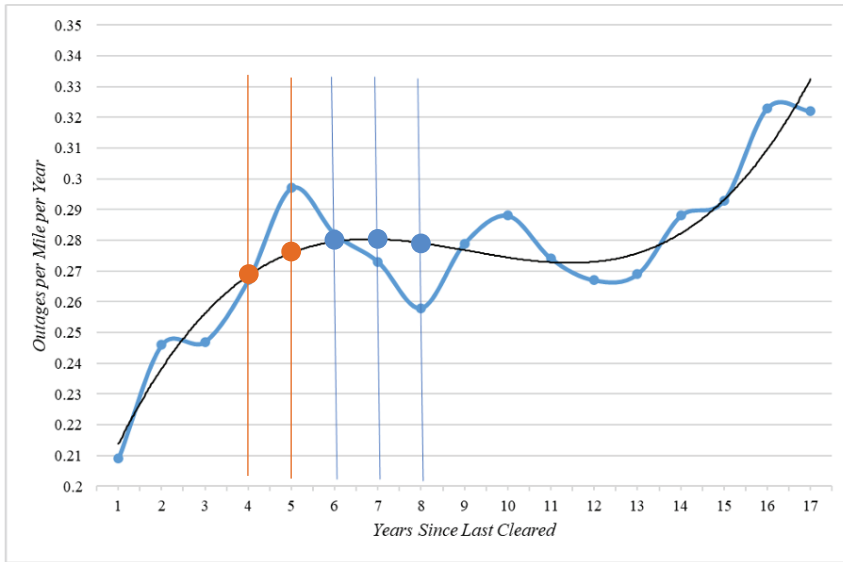
⁵ Additionally, Liberty commented that “[Consumers] has also added disadvantaged community status in its Forestry model to ensure visibility.” Liberty’s Report, Part II, page 9. While Environmental Justice (“EJ”) status by circuit is integrated into model output, it is not currently a model input and a part of overall circuit prioritization. The Company stated in its September 2023 EDIIP: “While environmental justice has not been an explicit consideration in Forestry prioritization, and while the Forestry backlog is smaller in EJ communities than statewide, the Company will begin using EJ status as a tiebreaker when comparing two circuits that are otherwise equal in Forestry prioritization terms when comparing traditional reliability performance.”

Post-Trimming 24.9 kV Performance

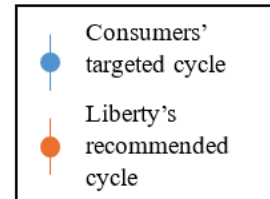
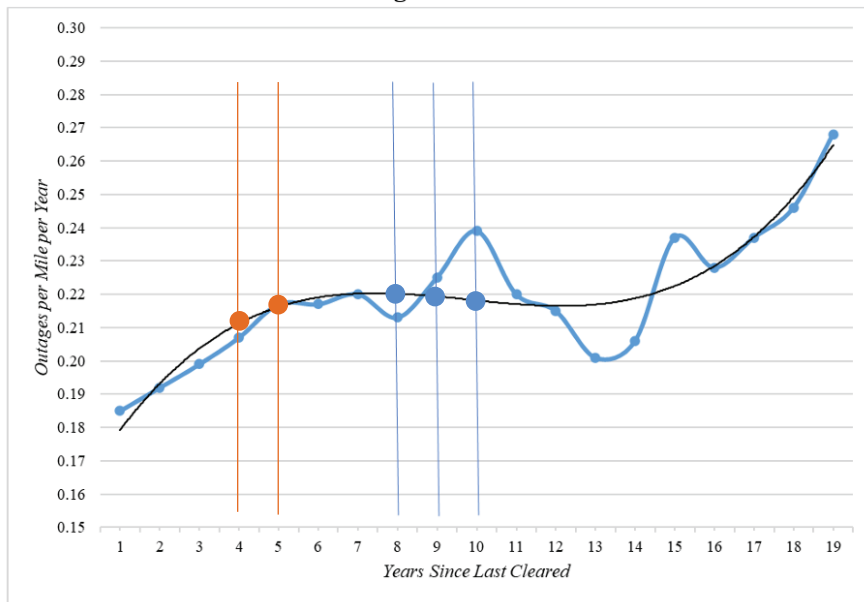


By contrast, the Company does not agree with Liberty’s finding that a similar risk profile exists for 7.2/12.47 kV circuits or for 4.8/8.32 kV circuits. In its report, Liberty found that “four-year cycles produce materially lower [outages per mile per year since a circuit was last cleared] *for all three voltage classes* than do longer ones.” Liberty’s Report, Part II, page 44 (emphasis added). The charts included in Liberty’s Report and copied below, which led to this finding, do not support this conclusion for all voltage classes. When comparing the average values for outages per mile per year from year four to year five with the current planned cycles averages from year six to year eight (7.2/12.47 kV voltage class) and year eight to year ten (4.8/8.32 kV voltage class), there is not a material difference in the values. Thus, in the Company’s view, this data does not dictate shorter line clearing cycles for these voltage classes. Rather, as the charts illustrate, longer line clearing cycles for these voltages enable the Company to prudently and cost effectively manage vegetation-related risk for its customers.

Post-Trimming 12.47 kV Performance



Post-Trimming 8.32kV Performance



Further, although the Company’s overall line clearing cycle strategy is an average of 7 years, a significant portion (29.5% – 14.4/24.9 kV substation voltage class) of the Company’s LVD system is currently planned to have lines cleared on a cycle that Liberty recommended.

The Company is aware that its line clearing cycles for its 7.2/12.47 kV and 4.8/8.32 kV voltage classes differ from cycle lengths at some other utilities, which was the primary basis for

Liberty’s recommendation to move to a four-to-five-year cycle. Unlike many of its peers, however, the Company’s LVD system is an extensive rural system with fewer customers per overhead distribution mile than other utilities. The following table is based on data in Liberty’s report and compares customers per overhead distribution mile of Consumers Energy and selected benchmark utilities from Liberty’s report⁶:

Figure 2 – Electric Customers per Overhead Distribution Mile

	Electric Customers (total)	Overhead Distribution Miles	Customers per Overhead Distribution Mile
Consumers	1,875,455	51,574	36
AIC	1,229,376	32,048	38
ComEd	4,111,172	34,648	119
LBWL	110,935	2,126	52

The Company’s relatively sparse customers per overhead mile creates unique vegetation management challenges for the Company that its peers do not face when developing optimal line clearing cycle strategies for their systems. And this is just one factor among multiple factors that a utility must consider as part of a holistic line clearing cycle strategy. These factors include, but are not limited to:

- Clearance standards: Line clearing specifications (e.g. tree-to-conductor clearance at the time of clearing) will drive how often a utility will need to perform line clearing – all else being equal, more rigorous clearance standards can allow longer line clearing cycles;
- Tree-caused outages;
- Line clearing maintenance costs;
- Vegetation density/canopy coverage: While extensive vegetation density/canopy

⁶ Liberty also noted in its report that the initial costs to achieve a desired cycle are far greater than maintaining the cycle once it is achieved. Liberty’s Report, Part I, page 71. The Company also acknowledges this fact, and its Analysis speaks to it. See Case No. U-20697, Analysis, pages 11-12.

coverage near a circuit may require more frequent clearing, depending on the applied clearance standard, this would likely also cost more to maintain at shorter clearing cycles; and

- **Circuit length:** It costs more to clear longer circuits to reduce tree exposure for all miles on these circuits.

Peer benchmarking is one factor informing the Company's strategy as it considers various line clearing cycles, but there are other factors to consider too. To develop a strategy that accounts for the Company's own unique system, which differs greatly from many of its peer utilities, all the above factors must be considered. Furthermore, based on discussions with utility peers and industry professionals, the Company is aware of utilities evaluating and implementing new risk-based tools (some similar to the Company's Forestry Workplan Intelligence & Strategy Engine (WISE) tool) and technologies (e.g. satellite and LIDAR imagery), as well as processes to enable more "targeted" or "condition-based" vegetation management strategies, which are strategies that seek to optimize line clearing cycles based on vegetation-related risk. Due to these conversations and the Company's understanding of these industry trends, the Company anticipates that some utilities will be extending line clearing cycles (i.e. beyond 4- and 5-year cycles) for some circuits that are lower risk.

To understand what it would take to follow Liberty's recommendation to attain four- or five-year cycles for the LVD system by the end of 2028, the Company has estimated expenses both within the first shorter cycle and ongoing maintenance costs after the first cycle:

- **Within first cycle:** The Company estimates a four- or five-year cycle would add an average of \$119.7 to \$151.4 million annually within the first cycle, or a total average annual expense of \$244.8 to \$276.5 million per year for 2025 through 2028. These calculations are summarized in Figure 3 and detailed with stated assumptions in Attachment 1, included with this response. Liberty estimated that its recommendation would cost \$100 million more annually through 2028. Liberty's Report, Part II, page 71.

Figure 3 – 2025-2028 Line Clearing Cycle Recommendation Expense Estimation

Cycle Length (Years)		5	4
Average Annual LVD + HVD	Line Clearing Costs (O&M)	\$ 244,763,880	\$ 276,456,610
	Crewing Required	782	877
U-21585 Projected Average Annual LVD + HVD (7-Year Effective Cycle for LVD)	Program Line Clearing Costs (O&M)	\$ 125,076,385	\$ 125,076,385
	Crewing Required	468	468
Incremental Annual Increase Over U-21585 Projection	Additional Costs to Meet Recommendation	\$ 119,687,495	\$ 151,380,225
	Additional Crews Needed to Meet Recommendation	314	409

- Maintaining after first cycle:** The Company estimates a four- or five-year cycle would cost around \$146 to \$162 million annually to maintain after the first cycle. These calculations are detailed with stated assumptions in the Analysis report and its Attachment 3. The Audit Report’s recommendation estimates \$100 to \$150 million annually after completion of the first cycle. *Id.*

The annual expense estimates for 2025 through 2028 represent an average expense level; actual execution of either strategy would need to account for a significant ramp-up to obtain required crewing and additional support. LVD line clearing miles targeted by the five-year and four-year cycle lengths reflect the mileage that would need to be cleared between 2025 and 2028: (i) to attain a five-year cycle by the end of 2028, all line miles last cleared in 2023 and prior would need to be cleared, and (ii) to attain a four-year cycle by the end of 2028, all line miles last cleared in 2024 and prior would need to be cleared.⁷

The Company is unable to comment on the exact reasons for the differences between the Company’s estimates and Liberty’s estimates because Liberty did not include supporting calculations. The Company’s estimates may be higher than Liberty’s estimates due to additional costs associated with per diem costs for out of state crews, additional line clearing administrative and support costs, and higher average unit costs. As demonstrated in the analysis and discussed previously in this response, residential customers would bear the bulk of these additional line

⁷ Projected LVD capital clearing miles are subtracted from the total line clearing miles.

clearing costs through rates when compared to non-residential customers.

Again, to the Company's knowledge, Liberty did not have an opportunity to consider the results of the analysis in its reports, so it is not clear how the analysis might have impacted Liberty's opinion of the Company's line clearing strategy. What is clear, however, is that the Company values Liberty's findings and its recommendation to move to a four-to-five-year line clearing cycle for LVD circuits overall. The Company will use these findings as it continues to evaluate its line clearing cycle strategy across its LVD system. In its next filed Reliability Roadmap and rate case, the Company may propose changes that result in a shorter overall average line clearing cycle for LVD circuits.

M. EDIIP Reliability Programs – LVD Reliability/Resiliency Measures – Recommendation 3: The Company Agrees to Eliminate Plans to Replace All Poles Found to be More than 45 Years of Age.

In response to Consumers Energy's proposal in its Reliability Roadmap to replace poles more than 45 years old consistent with EPRI standards, see MPSC Case No. U-20147, September 27, 2023 EDIIP Filing, page 70, Liberty countered that "[c]ondition, not age, should drive pole replacement." Liberty's Report, Part II, page 68. Liberty found "plans to replace poles that fail condition-based testing [are] reasonable," but plans to replace poles strictly based on age are not well justified. *Id.* The Company, it said, "employs sound methods to inspect, maintain, repair, and rebuild" poles that will ensure they are in good condition. *Id.* As a result, Liberty recommended that the Company "[e]liminate plans to replace all poles found to be more than 45 years of age on inspection" Liberty's Report, Part II, page 72.

As also discussed in its response to Part Two, Chapter I, Recommendation 5, the Company agrees and will not replace poles based solely on age. See discussion *supra*, page 20. The Company will update future distribution plans filed in Case No. U-20147 to eliminate the references to LVD pole replacement plans conducted solely on the basis of age.

To address pole deterioration, the Company will continue its visual inspection program and initiate a groundline inspection cycle as discussed in its response to Liberty's Report, Part II, Chapter I, Recommendation 4. See discussion *supra*, pages 18-20.

N. **EDIIP Reliability Programs – LVD Reliability/Resiliency Measures – Recommendation 4: To Reduce Safety Risks, Improve Local CEMI and CELID Metrics, and Facilitate Employee Training, the Company Still Plans to Replace Open Wire Secondary.**

In its Reliability Roadmap, Consumers Energy laid out its plan to replace, over the Reliability Roadmap's planning horizon, the 30,000 miles of open wire secondary remaining on the Company's system. There were several reasons to replace this open wire. Foremost among them is safety. Downed, open wire secondary is a safety issue because it is not well-insulated, not always easily accessible to crews, and usually located in higher population areas. MPSC Case No. U-20147, September 27, 2023 EDIIP Filing, page 57. Open wire secondary is also more challenging to repair, nearing the end of its useful life, and experiencing longer outages, on average, than multiplex secondary. *Id.* at 62. These safety and reliability issues are heightened in EJ communities where approximately 18% of the Company's secondary wire is open wire. *Id.*

Liberty questioned whether replacing open wire secondary on the Company's system is worth the cost. It noted that "[r]emoving all remaining open wire over the EDIIP period will produce only a nominal change in SAIDI minutes, compared to its over \$100 million in costs." Liberty's Report, Part II, page 70. As for the safety concern, Liberty questioned it saying, "Experience at other utilities does not generally command removal of open wire secondary on a programmatic basis for safety improvement reasons." *Id.* It similarly downplayed EJ considerations, noting that the Company's reliability and resiliency in EJ communities are "very competitive" and that the duration of outages in EJ communities is a "policy matter." *Id.* Despite these conclusions, Liberty did not dismiss the Company's plan out of hand. Instead, it invited the

Company to “[d]etermine whether considerations other than reliability enhancement warrant the EDIIP expenditures associated with open wire secondary removal.” *Id.* at 72. Accepting this invitation, the Company can confidently say that other considerations do warrant the expenditures.

While it is true that legacy open wire secondary replacement will not significantly improve SAIDI, legacy open wire secondary must be programmatically replaced to reduce the risk of the public contacting downed secondary wires. Legacy open wire secondary is mostly comprised of older and often spliced conductor supported by smaller poles. Liberty acknowledged that “trees and tree-related wind damage to lines with small poles and old spliced conductor are major causes of SAIDI including MEDs and excluding MEDs.” Liberty’s Report, Part I, page 5. Individual outages on the secondary system may not affect large numbers of customers, which is why the SAIDI impact is not high; however, CAIDI, CEMI, and CELID are negatively impacted by secondary outages. DTE also agrees that legacy open wire secondary takes longer to repair than multiplex secondary. See Liberty’s DTE Report, Part I, page 16.

For example, a group of six customers on a transformer supplying legacy open wire secondary in the Flint headquarters experienced four outages with restoration times of up to 23 hours (1,380 minutes) in 2024. Another group of 18 customers served by open wire secondary in the Kalamazoo headquarters has experienced three outages with restoration times up to 28 hours (1,680) in 2024. The Company acknowledges that the SAIDI impact may not be large, but these customers experience the frustration of frequent and long power outages that replacing open wire secondary would reduce.

The older, spliced open wire secondary conductor on the Company’s system causes down wires when damaged and presents a particular safety issue because, as the Company explained in the Reliability Roadmap, the wires are not well-insulated, are not always easily accessible to crews,

and are usually located in higher population areas. Replacing legacy open wire secondary with newer and stronger multiplex conductor will have a positive impact on the Company's wire down response, particularly during storms, because there will be fewer downed wires, and multiplex conductor can be repaired quicker. Faster crew response will also help free up wire down resources to move to new downed wires and improve response time.

Further, the Company's legacy open wire secondary replacement plan will facilitate employee training by providing more opportunities for apprentice training as the Company adds internal line worker resources to complete the work outlined in the Reliability Roadmap. Employee training is, of course, critical to the business. As Liberty noted, "[S]ome programs, measures, and activity areas will require long-term continuation. Consumers should ensure that it invests sufficiently in developing internal resources where effective and economical in the longer term." Liberty's Report, Part II, page 6. The Company agrees that investing in internal resources is vital to support the Company's increased work plan, and replacing legacy open wire secondary is a key part of its strategy to train apprentice line workers.

The Company, while understanding the SAIDI impact of open wire secondary is not large, maintains that the open wire secondary replacement plan is beneficial to reduce local outages, improve local CEMI and CELID metrics, facilitate employee training, and most importantly, reduce the safety risk of downed wires. Accordingly, the Company is committed to its planned implementation, as laid out in the Reliability Roadmap, and supported in Case No. U-21585, and does not propose a change.

O. EDIIP Reliability Programs – LVD Reliability/Resiliency Measures – Recommendation 5: Undergrounding Should Not Be Significantly Delayed Considering its System Resiliency Benefits.

The Company appreciates Liberty's comments on its overhead-to-underground initiative. Despite Liberty's doubts about the scale of the future effort, it supports the Company's progress

thus far. Liberty said, “Consumers is soundly employing limited scale undergrounding to allow it to gain information about what undergrounding on a larger scale can accomplish and at what cost.” Liberty’s Report, Part II, page 71. Additionally, Liberty recognized that other utilities are increasingly relying on undergrounding as a resiliency measure. “[U]ndergrounding use,” Liberty said, “is expanding as a resiliency measure, particularly in certain areas (*e.g.*, Florida with significant tropical storm exposure, and California with significant wildfire exposures).” *Id.* at 70. Although Michigan does not experience tropical storms nor the level of wildfires of California, it is indeed storm damage and wildfire risk that LVD overhead-to-underground conversions mitigate. In the Company’s distribution plans and rate cases in Case Nos. U-20147, U-21389, and U-21585, it has explained that the purpose of increased undergrounding is to increase *resiliency* and has not made a claim that this undergrounding initiative would decrease systematic non-MED SAIDI significantly.

To date, the Company has limited the number of miles it has undergrounded. Liberty does not disagree; rather, it appears to be concerned about a major expansion in the amount of annual expenditures for the program. The Company is often compared to similarly situated utilities like those in Liberty’s Report, Part I, Chapter VI, which have larger percentages of their distribution systems underground. But because of the size of Consumers Energy’s distribution system, more miles would need to be undergrounded to keep pace with the Company’s peers, on a percentage basis, and provide customers with resiliency benefits comparable to these similarly situated utilities. On top of its sheer size, given the inclement nature of lake-effect weather, as noted by Liberty, the Company must invest in a minimum of 2,000 to 9,950 additional miles to compare to Ameren IL and DTE, respectively.

Increased underground LVD infrastructure is necessary to build Michigan a more resilient

grid, and the Company believes that it is on the right path by proposing undergrounding amounts in 2024 through 2026 that will allow it to convert 200 miles a year by 2026. This will be a significant step toward the 3,200 LVD miles that the Company is strategically targeting for conversion from overhead to underground. See MPSC Case No. U-20147, September 27, 2023 EDIIP Filing, page 78. From 2026 to 2027, the Company plans to further increase spending twofold, doubling the annual number of LVD line miles being converted from overhead to underground. *Id.* at 79. Although it would delay the realization of the resiliency benefits of undergrounding, the Company could defer its full program rollout and constrain the LVD overhead-to-underground conversion efforts to 2026 levels (200 miles) while parties review and analyze the observed program benefits. If this is the Commission’s preference, the Company will propose revisions to its undergrounding plans in its next distribution plan filed in Case No. U-20147.

P. EDIIP Reliability Programs – Substations and Transformers – Recommendations 6 and 7: Failure to Address Transformers in a Proactive Manner Will Result in Unplanned, Long-Duration Interruptions to Customers.

Concerning the Company’s substations and transformers, Liberty recommended that the Company “[r]evisit substation transformer replacement and substation rebuild plans” and that it “Redesign LVD substation transformer health assessment to minimize age as a factor in determining replacement levels.” Liberty’s Report, Part II, page 78. The Company has over 1,100 substations that feed our more than 1.8 million electric customers. The Company monitors these substations through inspections and maintenance activities that drive the basis for the overall health and condition of the equipment and entire substation. Many factors go into the health evaluation for major pieces of equipment including monitoring the age of equipment considering the equipment’s designed lifecycle.

In response to Recommendation 7 to redesign the LVD substation transformer health assessment and minimize age as a factor for determining replacement levels, the Company believes that age is already a minimal factor in a transformer's health evaluation. The current asset health factors place a 14% weight on a transformer's overall health if the transformer is over 50 years old. The Company's use of 50 years as a threshold is an acceptable practice as industry experts, like EPRI, show 35-45 years as the life expectancy of a transformer.

There are a number of industry related publications that discuss the importance of age in relation to a transformer's service life. Age is important in a transformer's assessment because as a transformer ages, the insulation breaks down leading to gases developing in the unit, oil quality issues, and mechanical system degradation. The oil is monitored through dissolved gas analysis ("DGA") and oil quality testing, which is part of the Company's inspection and maintenance practices and the transformer overall health score. Worsening DGA levels and oil quality are primary leading indicators of the remaining serviceable life of a transformer. DGA provides transformer oil analysis ("TOA") condition codes for the transformer that range from one to four, with four being the worst. Transformers are not replaced based on age alone but also account for multiple factors like DGA results that provide additional insight into the transformer's health. To minimize the impact of transformers more than 50 years old, which is past the industry recognized expected life of the equipment, does not account for a characteristic important in understanding the long-term serviceability of the unit in conjunction with other health indicators.

In response to Liberty's recommendation that the Company revisit its substation transformer replacement and substation rebuild plans, the Company would note that the transformers planned for replacement are units identified through inspection practices with failing test results. These are the same strong inspection and maintenance activities acknowledged by

Liberty in this report. At present, there are approximately 100 transformers that have a TOA condition code level four, the highest level, and require replacement. In addition, another 70 units are currently at a TOA condition code level three and are trending to a code level four. This represents a very real risk to the reliability of the system and the service our customers deserve.

The Reliability Roadmap sets forth an investment plan to address these 100 transformers in TOA condition code level four to remove the risk that our customers will experience an unplanned, long-duration outage. The investments to replace these transformers is significant, and while some can be accomplished through single transformer bank replacements, many reside in substations where the asset health of other components needs to be addressed while the substation is out of service. Depending on all of these health indicators, the Company evaluates the cost of maintaining assets and replacing them one at a time or rebuilding the entire substation to reduce the multiple outages needed to address failing equipment.

Liberty suggests that eliminating age as a factor could result in savings of \$250-\$300 million from an \$800 million projected Reliability Roadmap investment (equating to a 25-27.5% reduction). As stated above, however, age is not the sole determining factor in transformer replacement. In leveraging TOA results alone, there are approximately 100 units in need of replacement and 70 more trending in that direction. These transformers, in addition to the hundreds of other pieces of substation equipment with inspection and test results signaling a replacement need, dispute Liberty's projected 25-27.5% reduction in substation spending that could be achieved by removing age alone.

Substations represent a key piece of utility infrastructure in every community where substation outages impact thousands of customers at a time. Failure to address transformers in a proactive manner will result in unplanned, long-duration interruptions to customers where a single

event could drive to 2-3 minutes of SAIDI per failure.

Q. EDIIP Reliability Programs – HVD Lines – Recommendation 8: Age Is Not Currently a Factor Considered when Replacing HVD Poles.

The Company has no concerns with the recommendation to eliminate age as a factor in HVD pole replacements, as age currently is not considered. Liberty suggests that age is a factor in pole replacement during pole top rehabilitation plans and pole replacement work. Liberty's Report, Part II, page 81. This is inaccurate. When scoping a pole top rehabilitation plan, the most recent pole inspection data, including remaining shell thickness, is reviewed and evaluated to see which poles passed the previous inspection cycle but will likely fail during the next inspection cycle. All poles that failed the previous inspection and those determined by inspection data likely to not pass the next inspection cycle, are added to the pole top rehab plan to save our customers the cost of going to the same location twice within 5-10 years. This is not an age-based replacement but one based on available asset health information to proactively mitigating multiple trips to the same location.

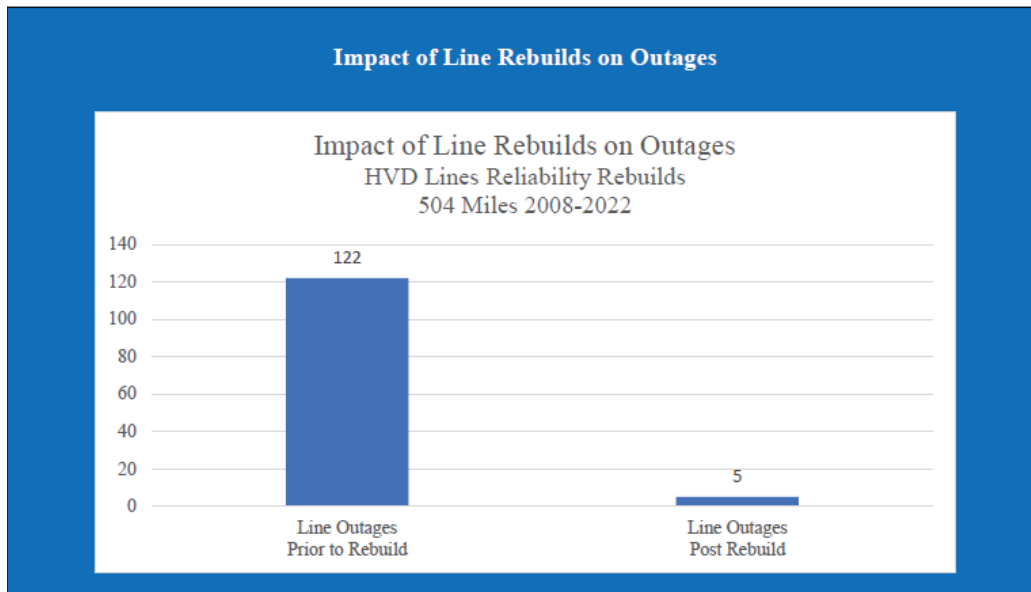
For HVD pole replacement projects, poles are replaced based on the results from Consumers Energy's inspection practices. Age is not considered when selecting poles to be replaced, as they are all poles that failed during the previous pole inspection cycle. Evaluating the conditions that are required to support 100% replacement of any pole rejected during the inspection process indicates a significant investment is needed upfront and continually year over year after the backlog is addressed. Currently, there are 2,500 poles identified through inspection in the backlog at current unit cost of \$27,000. In total, replacing these poles will require approximately \$67.5 million. In addition, annual pole rejection rates for the HVD pole inspections have been trending down to 8.3%. In a normal year, the Company will inspect approximately 7,000 poles, meaning approximately 580 poles will be rejected. This will cost about \$16 million per year to

replace. The \$67.5 million represents a level of spending never achieved in the HVD lines Reliability program in a single year and this level does not account for the \$16 million in poles that will be identified for replacement next year. By not increasing funding in HVD Lines Reliability program, the backlog of poles and other assets identified during the Company's effective inspections will continue to grow, increasing risk and introduce more unplanned failures on the HVD system.

Liberty further said that “[i]t is not clear that rebuilding lines based on their use of non-standard and obsolete construction or equipment will materially enhance reliability performance.” Liberty's Report, page 80. But the history of HVD line failures shows that from 2015 through 2022 non-standard and obsolete conductors, which is included in non-standard configurations and equipment, was the leading cause or second leading cause of outages on the HVD system – contributing anywhere from 2.8 minutes to 7.5 minutes of SAIDI contribution to the overall HVD system SAIDI. During this time, and since the Company made targeted investments aimed at eliminating areas of poor performing non-standard and obsolete conductors, there has been a steady decrease in the five-year SAIDI average contribution in this category. Specifically, in 2021, the Company had a 6.2-minute average peak, which was reduced to a 3.4-minute average in 2023. Current 2024 performance indicates the Company will continue to see a downward trend in this area.

The figure below shows the significant impact that rebuilding lines has had on outage improvements. This area of investment has multiple benefits, as rebuilding these lines eliminates the top two SAIDI impacting contributors to the overall HVD system SAIDI in insulators and non-standard obsolete conductors.

FIGURE 10



The Company disagrees with Liberty that there is not a substantial need or benefit to increasing spending on HVD facilities. While the Company agrees with Liberty that the Company has effective inspection, maintenance, and repair practices; it disagrees with only addressing items identified during the inspections. This practice would rely on just-in-time correction that only addresses issues at individual locations and fails to address system-level issues. The HVD system is the backbone of the distribution system where outages impact whole communities and thousands of customers at a time. Continued increased investment into the system, while addressing items identified from inspections, is required to address Liberty’s apparent support for completing the pole inspection backlog.

R. EDIIP Reliability Programs – Other Measures – Recommendation 9: The Company Is Evaluating its 5G Transition Plans, Including Potential Costs, and Will Update its Plan in its Next Reliability Roadmap Filing.

Consumers Energy is developing a plan to replace 4G meters with 5G meters, and Liberty advised the Company “to plan dynamically when it comes to the sunset of communications technology” Liberty’s Report, Part II, page 86. According to Liberty, “The EDIIP shows

replacement rates through 2026 that are not out of line with the 20-year replacement cycles that apply to meters generally,” and it positively observed that “[t]he rates rise significantly starting in 2027, which allows for deferral if 4G sunsetting is delayed and leaves time for increase if accelerated.” *Id.* Given this flexibility, Liberty did “not question the plan as presented” but stressed the importance of “continually assess[ing] potential movements in this cost area.” *Id.* at 88.

The Company’s 4G Long-Term Evolution (“LTE”) communications network provider, Verizon, has not provided a definitive date for the retirement of the 4G LTE network; however, they have communicated their commitment to maintain the network into the mid- to late-2030s. With that in mind, the Company is evaluating its existing metering technology, vendors, and software, including technology to support future electric and gas system integrations (e.g. Distributed Energy Management Systems (“DERMS”) and edge-DERMS, among other systems). The Company will make a decision in 2025, with the deliverable plan targeted to be completed by year end. The overall investment required will obviously be an important factor in the Company’s decision. Once a decision is made, before transitioning to 5G meters, the Company expects it will be able to maintain the existing technology and the existing population of 4G LTE and 4G CatM1 meters for the next three to four years.

The Company is also considering advanced metering infrastructure (“AMI”) software that can be integrated with other grid operations software, including DERMS and edge-DERMS. The choice between AMI technologies will not impact AMI purchasing decisions for the ongoing rate case bridge period or test year. But the choices the Company is evaluating may impact the Company’s future meter purchases. Until a software decision is made, the Company cannot say what type of meter it may decide to purchase in the future. In the meantime, the Company is

currently purchasing 4G CatM1 meters, which are 5G forward compatible.

With the current AMI technology in use, for combination customers, the gas meter reads are transmitted to the collection system via the electric meter. Due to this interdependency, the Company must look at any future updates or changes to the AMI system holistically. The Company identified scenarios in 2023, and in 2024 it began analyzing each scenario. The scenarios include maintaining existing technology (status quo), using a single meter vendor, and using multiple meter vendors. To test the scenarios, the Company performed a SWOT (Strength, Weakness, Opportunity, Threat) analysis, evaluating each scenario's advantages and disadvantages.

The Company is also looking at similar functionality in use today, including automated reading, remote turn-on and turn-off, and other new functionalities being offered such as grid-edge computing. The Company's business case for future AMI technology, when developed, will prioritize replacing technology that is obsolete.

As Liberty recommended, when assessing its 5G transition options, the Company will weigh the costs and, when reasonable considering all factors, favor a plan that "unburdens EDIIP period expenditures." Liberty's Report, Part II, page 88. The Company will update its 5G transition plans with the latest available information in its next filed distribution plan in Case No. U-20147.

S. Emergency Planning and Response – Emergency Preparedness and Response Plan and Organization – Recommendation 1: The Company's Web-Based Storm Restoration Manual is Far More User-Friendly than a PDF Copy.

As Liberty described it, Consumers Energy has a Storm Response Manual ("SRM" or "manual") that adopts the National Incident Management System ("NIMS") and incorporates the Company's Incident Command System ("ICS") for electric restoration activities and emergency

response. Liberty's Report, Part II, page 90. Liberty noted that "Consumers fully adopted the ICS in 2019 based on the NIMS emergency management structure, concepts, and principles." *Id.* Concerning the manual, Liberty observed that it totals over 1,000 pages and is divided into 11 major chapters, each with several subchapters. The manual describes roles and responsibilities and explains how the ICS functions when it is activated in response to severe weather or another emergency. Liberty "found the SRM professionally prepared, comprehensive, detailed, and seemingly up to date," and its primary concern appeared to be with the size of the manual. *Id.* at 91, 112. As such, it recommended that the Company modify the manual to "allow for easier navigation and to address restoration history and control." *Id.* at 115.

The Company recognizes that the objective of this recommendation is to potentially improve the manual's navigation and user experience, including improved revision controls and better documented updates (e.g. signature boxes in the paper copy of the manual identifying the author or reviewer), to make it more user-friendly. The Company agrees with this intent; however, the basis of this recommendation does not reflect the manual's actual deployment, capabilities, and practical use. For this reason, this recommendation is unintentionally misdirected.

As Liberty's comments reveal, it requested, and the Company provided, a PDF version of the Company's manual. See Liberty's Report, Part II, pages 90, 115 (describing the manual as a two-volume document over 1,000 pages and noting that it is not paginated). It appears that the basis for this recommendation is tied solely to Liberty's review and use of this PDF version even though the manual is designed and used as an interactive, web-based experience. It is not intended to be used as a printed PDF document, and this is not how the Company personnel use it.

Liberty recognized that the "web-based application hosts the SRM and that this version provides automated revision tracking and a search function allowing users to type in key words to

find content.” *Id.* at 90. Yet, the PDF version Liberty reviewed was a digital copy of the web-based manual. Again, this is not how the Company uses it. The Company’s standard is to use the web-based version of the SRM for restoration management activities, and this is the official system of record for the Restoration Management team. The web-based version has automated revision tracking and user-friendly navigation, which are features Liberty suggested.

Since the Company uses the web-based version of the manual, it is currently meeting the objective of this recommendation. No significant changes are needed to the SRM to meet this objective at this time. The Company is committed to ensuring that the manual fully supports Restoration Management activities and that it is actively managed to reflect current capabilities and processes. The Company will continue enabling user-friendly navigation and revision history control as it makes any updates to the SRM to reflect changes in processes and procedures.

T. Emergency Planning and Response – Emergency Preparedness and Response Plan and Organization – Recommendation 2: The Company Will Continue to Ensure Up-to-Date Succession Planning for Restoration Management Leadership Roles.

Concerning Consumers Energy’s Restoration Management organization, Liberty described the organization’s members as “knowledgeable and engaged in their roles,” but it questioned the group’s “bench strength.” Liberty’s Report, Part II, page 112. It said, “The low staff levels of the group represent a focusing of skills and experience within the group, and particularly with Restoration Management leadership.” *Id.* Because Liberty found that skills and experience were concentrated in a small group, it worried that the loss of a group manager would challenge the Company’s ability to find a suitable replacement. This led Liberty to recommend that the Company “[e]nsure up-to-date succession planning for Restoration Management leadership roles.” *Id.* at 115.

The Company agrees with the intent of this recommendation to ensure up-to-date

succession planning for Restoration Management leadership roles given the critical nature of the Restoration Management team’s activities. The Company, however, already conducts annual succession planning for leadership roles across the Company each year, and this was recently completed this past summer for the Restoration Management roles that Liberty was concerned about. Thus, potential candidates have been identified to fill Restoration Management leadership positions, if necessary, and development plans have been put in place for each candidate to develop any needed skills or capabilities required to fill the leadership position.

Importantly, leadership role candidates are identified from a broad pool of candidates across the Company rather than a single pool of candidates from within a particular department. This enables the Company to develop and position leaders across the Company with cross-functional skills and capabilities while creating continuity for experienced and effective leadership. As a result, the Company’s current succession planning meets the intent of this objective.

Also, the Company’s response to Chapter 3, Recommendation 3 demonstrates that the Company is focused on hiring and aligning resources that will bolster its Restoration Management team overall with adequate “bench strength” to support leadership and potentially fill leadership roles if required. See discussion *infra* at 55-57.

U. Emergency Planning and Response – Emergency Preparedness and Response Plan and Organization – Recommendation 3: The Company Is Increasing Restoration Management Staff Levels with Individuals with Specialized Expertise as Liberty Recommended.

Liberty evaluated Consumers Energy’s Restoration Management’s staffing levels and concluded that they are “light” considering the “nature and extent of its responsibilities.” Liberty’s Report, Part II, page 112. According to Liberty, “Storm related planning and restoration activities have always been critical to maintaining safe, effective and economical service to customers. But

it is becoming even more so now with the increasing digitization and electrification of everyday activities.” *Id.* Liberty said that there are skills (e.g. strategists, technologists, and data scientists) that Restoration Management outsources from beyond the organization that would benefit Restoration Management if moved within the organization and directly managed. *Id.* at 116. As a result, Liberty recommended increasing staffing by adding positions for candidates with specialized expertise and experience. *Id.*

As the Company pursues operational excellence and strives to meet the MPSC’s Service Quality and Reliability Standards for Electric Utilities, the Company is committed to ensuring the Restoration Management function is well resourced and effectively structured. Therefore, the Company agrees with this recommendation. Since Liberty did not identify deficiencies in processes or performance related to the Company’s current Restoration Management staffing levels or strategy, Liberty presumably intended to leave this to the Company’s discretion. And the Company is exercising its discretion by filling existing vacancies and evaluating further staffing increases.

The current Restoration Management staffing plan would grow direct Restoration Management staffing from its current six to a total that is similar to 2022 staffing levels. The proposed staffing structure is as follows:

- Restoration Management Senior Leader (Planned: 1, Current: 1) – Responsible for overall Emergency Response including Restoration Management activities in both execution and strategy.
- Restoration Management Emergency Response Team (Planned: 5, Current: 4) – Responsible for preparing and managing storm response. The Company expects that one open position will be filled by the end of the year and is currently evaluating staffing increases for 2025.
- Resource Management Strategic Planning and Performance Team (Planned: 4, Current: 3) – Responsible for pre-planning, resourcing, standards coordination, project management for future storm response. This team is also responsible for relevant

regulatory reporting. The Company has filled two positions internally to be effective November 1 of this year with plans to fill another existing gap.

As Liberty remarked, the Company is hiring a full-time meteorologist. The Company expects that this position will be filled by the end of 2024. Although not directly managed by the Restoration Management team, the Company's meteorologist will work directly with the team in storm preparation and management activities, including the outage modeling activities discussed in the Company's response to Chapter 3, Recommendation 4. See discussion *infra* at 58-60.

Additionally, the Company uses a matrixed organizational approach to leverage resource skills and capabilities across the Company that are not directly managed within Restoration Management but enable Restoration Management activities. These roles include, for example, data scientists and IT professionals that support digital pre-planning, performance reviews, and technology needs. Furthermore, the Service Restoration Rally Room brings together resources and skills from outside of the Restoration Management team as needed and oversees and executes key Restoration Management plans and performance.

As discussed in the Company's responses to Liberty's other recommendations, the Reliability Roadmap, and pending rate case, the Company is exploring and implementing new tools and technologies, like the Field Mapping Application and Fault Location Isolation & Service Restoration ("FLISR"), empowering Restoration Management to restore power quicker. As the Company gains experience with these tools and technologies, it will reassess the need for new direct or indirect Restoration Management staffing to meet the Company's and the MPSC's storm restoration goals.

These plans to prudently increase the Restoration Management team with individuals with specialized expertise and experience, as Liberty recommended, and to continue aligning resources across the Company to support Restoration Management functions will help it achieve its

restoration goals.

V. **Emergency Planning and Response – Pre-Event Planning – Recommendation 4: The Company Has Detailed Plans for More Tailored and Accurate Outage Modeling.**

Since 2021, Consumers Energy has contracted with IBM for outage prediction modeling. As IBM describes its outage prediction service, it “combines utility inputs, such as service territory maps, mobilization tiers or levels, and historic outage data, with current and forecasted weather data to create a customized model that makes predictions about outage numbers and outage types.” Liberty Report, Part II, page 94. “The results of the model provide the predicted number of outages, indicating the projected size and scale of the storm,” which “drives decisions on the number of resources to secure as part of the pre-planning process.” *Id.* Accompanying IBM’s prediction modeling, the Company uses DTN’s weather forecasting services. Liberty said that it was unusual for a utility to use separate vendors for these services and was concerned that it could “introduce[e] inconsistencies between the weather and outage forecasts.” *Id.* Liberty also had other reservations about IBM’s outage prediction services. Although Liberty did not have a robust dataset with which to test IBM’s actual versus predictive accuracy, the data it did have did not instill confidence in IBM’s accuracy. *Id.* at 95, 112-113. As a result, Liberty recommended that the Company “continue to evaluate (via its request for proposals) whether a different third-party outage modeling vendor might provide more useful and impactful results.” *Id.* at 116. It also suggested that the Company consider developing its own outage model.

The Company agrees that accurate outage modeling is critical for restoration staffing and planning for forecasted storms. An accurate outage prediction model is a powerful tool that allows the Company to confidently pre-stage resources in communities predicted to have the most outages. Accurate predictions, therefore, can greatly improve the Company’s storm restoration performance, including wire-down response.

The Company has previously requested funding for technologies that would improve the accuracy of the Company's outage modeling. Some have been rejected and others approved:

- FLISR application – In Case No. U-21389, the Company requested funding for the FLISR application as part of an ADMS upgrade. In addition to FLISR's ability to reduce customer restoration times through remote operating switching, it produces more accurate fault location data that will also enable more accurate outage modeling. Liberty found that FLISR and other ADMS upgrades were a "sound investment." Liberty's Report, Part II, page 87. In Case No. U-21389, the Company's request for FLISR was denied and the investment was not approved. Nevertheless, with Commission approval in the ongoing rate case, the FLISR application can still be fully integrated into ADMS in 2025.
- Catastrophic Crewing ("CatCrew") Tool – In Case No. U-21389, the Company requested funding to update its CatCrew Tool, which is used by the Restoration Management team to model expected outages and restoration resource and timing needs. The Company requested funding to enable updates to the tool to improve the accuracy of its outputs. The request for the CatCrew upgrade in U-21389 was approved.

In addition to the investment plans above, the Company is currently working to improve its outage modeling results through two other initiatives, which are expected to improve outage modeling capabilities in early 2025. These initiatives fulfill Liberty's recommendations. See Liberty's Report, Part II, page 116.

- New Third-Party Outage Model – The Company is currently evaluating third-party vendor technologies that could potentially improve upon IBM's outage modeling capabilities. The Company is also consolidating vendors. As Liberty noted, the Company uses one vendor for outage prediction and a separate vendor for weather forecasting. But RFPs are now open to third-party vendors to merge the Company's weather and outage modeling services. The Company expects to select a third-party provider by the end of 2024, and it will then be able to leverage the outputs of the third-party vendor's model by April 2025.
- New In-House Outage Model – The Company plans to internally develop a standalone outage prediction model. This in-house model would provide the Company another dataset to compare against outputs from the third-party outage model. Currently, this model is in its preliminary stages and is scheduled to be operational by late 2025. Once developed, the Company would run the in-house model concurrently with the third-party vendor model to compare results and test its output to determine if the in-house model is a candidate for an upgrade and whether it could ultimately replace the third-party model.

In summary, the Company agrees with this recommendation and plans to invest in technology that will improve the Company's outage modeling prediction accuracy beginning in early 2025. Furthermore, the Company will continue to assess the predictions from these capabilities against actual outages to identify areas of improvement to drive better prediction outcomes for future storms.

W. Emergency Planning and Response – Pre-Event Planning – Recommendation 5: The Company's Pre-Planning Processes and Procedures Already Satisfy Liberty's Recommendation.

Concerning the Company's rapid response to forecasted storms, Liberty advised the Company to "classify weather events no later than when the decision is made as to whether available field resources will need to be supplemented and as early as data permits a reasonable assessment of a weather event's impact." Liberty's Report, Part II, page 116. The Company understands that the intent of this recommendation is to enable efficient storm restoration preparation performance by potentially improving Restoration Management's pre-planning activities by classifying storms early, identifying resource needs as soon as possible, and activating pre-storm communication processes and procedures with enough time to prepare. While the Company welcomes opportunities to improve its storm response preparation processes and procedures, the basis for Liberty's recommendation is inaccurate and misstates the Company's current processes for event classification, resource identification, and pre-storm communication. In reality, the Company already has appropriate processes and procedures in place to meet the intent of this recommendation.

When preparing for a storm, the Restoration Management team uses its current IBM outage prediction model to predict the number of outages a potential storm is likely to cause. The Restoration Management team then uses its CatCrew tool to estimate how many resources it will need to timely restore power consistent with the MPSC's standards. Based on the outage

prediction and estimated resource needs, the Restoration Management team then makes and communicates an event classification for the potential storm event. Liberty noted that the storm incident classification levels are in the Company's SRM. Liberty's Report, Part II, page 95. Initial storm classifications are documented on an ICS Form 201 for each storm event, which is available to all storm responders in the ICS organization.

The below findings conflict with the Company's current event classification and resource identification processes and procedures described above:

- Audit Report, page 96: "Analysis showed that management did not classify any of these events prior to event start date." This is incorrect as described above. All initial storm classifications are documented on ICS Form 201.
- Audit Report, page 96: "Consumers' event level classifications provide no specific guidance as to potential resource requirements." This statement could be misleading, as predicted customer outages and estimated resource needs dictate storm event classification; storm event classification does not dictate resource needs. In other words, a storm can only be classified after the Company predicts expected customer outages and estimates its resource needs.
- Audit Report, page 113: "The storm team communicates internally to activate the required resources and processes without attaching value or significance to the determination and communication of an event's classification. This view should change." This statement could also be misleading since the "value or significance" of a storm is the predicted customer outages and estimated resource needs, not the storm incident level by itself. While storm classification may be useful as a trigger for certain storm-related activities, the predicted customer outages and estimated resource needs is the foundational information that drives all storm restoration related activities.

As for storm communications, the Company currently plans for storms on a weekly basis in advance to prepare for a weather event's impact and communicates accordingly to its internal stakeholders. In terms of timing, every week the Company prepares the next week's potential storm responders based on their ICS roles. When a storm threatens, preparation includes assigning a storm a preliminary ICS Level based on meteorological forecasts. Storm preparedness communications are sent every Thursday, and the information shared is documented in ICS Form

201. Additionally, every day there is a Daily Communication Report that provides storm preparation and planning updates to relevant internal stakeholders across the organization. This information includes any changes to initial forecasts and updates to expected resource needs.

The following finding conflicts with these storm communication processes and procedures:

- Audit Report, page 96: “Analysis showed that management did not classify any of these events prior to event start date. Neither did it change any classification for these events once made.” As described above, storm event preparation and planning updates are communicated daily to all stakeholders via the Restoration Management Daily Communication Report. Based on changes communicated on this report, including event classification changes, appropriate storm response related actions are taken. Liberty confirms this in a later statement: “[I]n late 2023 to publish a Daily Communication Report that presents a five-day look ahead that contains, among other useful information, outage prediction and resource requirement data and an ICS incident level prediction.” Liberty’s Report, Part II, page 96.

Furthermore, the Company does correct the ICS Level categorization data when it is finalized for MPSC reporting purposes. For example, if a storm is initially reported as affecting an estimated 190,000 customers and later data validation determines that only 180,000 customers were affected, this information will be shared with the MPSC. Likewise, if there is a relevant incident level adjustment, this information will be shared as well. These updates are done across both normal, gray sky, and catastrophic storm conditions.

The Company has appropriate processes and procedures in place to meet the intent of Liberty’s recommendation and no further action should be required at this time.

X. Emergency Planning and Response – Pre-Event Planning – Recommendation 6: The Company Agrees to Better Capture and Analyze Data About Outside Assistance.

Consumers Energy sometimes calls upon outside resources (e.g. off-system contractors or mutual assistance from regional utility partners) to help restore power when catastrophic storms cause widespread outages. Liberty said that the Company does not collect or analyze data that would allow it to assess when it uses outside assistance or how responsive these outside resources

are. Liberty’s Report, Part II, page 113. This led Liberty to recommend that the Company “[c]apture and analyze data associated with external resource requests.” *Id.* at 116. The Company understands that the intent of this recommendation is to inform future external resource requests and improve external resource restoration performance. The Company agrees that collecting data about outside assistance could potentially improve external resource performance during storm restoration events.

In 2024, the Restoration Management team started documenting when requests were made and which contractors responded during storm events. To date, this has been an intensive manual data collection effort. Based on this experience and this recommendation, the Company is evaluating technology solutions that can automatically collect relevant data about the timing and response of external resource requests. The Company plans to continue evaluating, through 2025, currently implemented or planned technology applications and third-party applications. Depending on the Company’s evaluation of internal and third-party applications, it may issue an RFP from third-party providers in late 2025.

In short, the Company agrees with this recommendation and is currently evaluating internal and external technology applications to automate the collection of external resource request data.

Y. **Emergency Planning and Response – Wires Down – Recommendation 7: The Company Has Identified a Callout Objective and a Time Frame to Reach It.**

When a storm is forecasted to impact Consumers Energy’s service territory, the Company reaches out to coworkers seeking volunteers for storm duty – wire-guard and wire-evaluator duty in particular. According to Liberty, while there are thousands of coworkers eligible for wire-guard duty, “the numbers do not present an accurate depiction of resources on which it can effectively rely.” Liberty’s Report, Part II, page 114. Liberty observed that “Consumers has reported a number of steps to increase wire down call out responsiveness, including verification of the

accuracy of worker profile data, the conduct of additional training and education regarding how to accept a callout request, how to maintain profile/qualifications, and refining leadership's communication to coworkers and their supervisors to further emphasize and explain the importance of maintaining an ARCOS [Automated Roster Call-Out System] profile with a good phone number and an employee's responsibility to respond to ARCOS callouts." *Id.* at 117. All these steps, Liberty said, "represent worthwhile efforts to help enhance call out responsiveness," but Liberty also said that "[w]ithout a measurable goal and timeline, evaluation of the effectiveness of any identified improvement efforts becomes uncertain." *Id.* Therefore, it recommended that the Company "[i]dentify a call out objective and a time frame to reach that objective." *Id.*

In the Commission's September 26, 2024 Order in the present case, it identified this recommendation as a safety issue and directed the Company to answer specific questions about it and other safety issues. As directed, the Company agrees that this recommendation is related to a potential safety concern tied to downed wires. The Company understands that the intent of this recommendation is for the Company to establish timelines and expected impacts of the various projects and process improvements the Company has planned to encourage more coworkers to respond to wire-down callouts. Based on this understanding, the Company agrees that this recommendation can assist the Company in addressing this potential safety concern by helping increase transparency and accountability across the organization as the Company improves wire-down response performance.

In addition to the initiatives that Liberty mentioned related to the Company's ARCOS application, the Company is currently planning to pursue several options to improve its wire down callout responsiveness in 2025:

- Revisit the Wire Guard Agreement and Wire Down Evaluator Agreement with the Union – These agreements require an order of engagement process to be followed when

running Wire Guard and Evaluator callouts. This engagement process has been used but with limited success. The current agreements prevent pre-staging of these resources unless a storm is declared for individual headquarters. The Company is planning to re-open these agreements to align on adjustments for its wire-down procedures.

- Electric Meter Operations Wire Down Involvement – The Company’s Electric Meter Operations has been more heavily engaged in 2024 to relieve police and fire wire-down incidents.
- ESW Pre-Staging – The Company is evaluating a change to processes by which it pre-stages ESWs within headquarters locations to reduce or eliminate the callout response time.

The Company understands that there are opportunities to improve its wire-down response through changes to its callout processes. Adjustments to its Union agreement (if an agreement can be reached), increased involvement from its Electric Meter Operations teams, and changes to pre-staging processes will improve performance on this metric and drive callout performance improvement in 2025. As always, the Company will continue to evaluate its performance by seeking input from broad cross-functional teams (like the team that gathers in the Company’s Service Restoration Rally Room) to identify areas of improvement and to develop mitigation strategies to improve its wire-down response performance.

Z. Emergency Planning and Response – Wires Down – Recommendation 8: The Company Has Taken Steps to Secure Downed Wires within Two Hours for 90% of its Customers in Metropolitan Areas by 2025.

Liberty observed that Consumers Energy targets two hours to secure downed wires in metropolitan areas but that actual response times are well above this target. Liberty’s Report, Part II, page 114. Accordingly, Liberty recommended that the Company “[i]dentify a time frame for reaching the wire down secure time objective of two hours for MSAs and non-MSAs and provide regular reporting to management on the status of improvement efforts.” *Id.* at 117. Through these comments, the Company is fulfilling this recommendation and informing the

Commission that it is currently on track to secure, by 2025, wire downs within two hours for 90% of its customers in metropolitan areas consistent with the Commission’s service quality standards. As Liberty noted, “Consumers has acknowledged that it needs to improve its wire down response time and indicated that it has a number of ongoing initiatives to do so,” which “appear focused and likely useful.” *Id.* at 117. It went on to say that “the degree of improvement needed is substantial and will require management time and attention to ensure measurable improvements in this critical public safety process.” *Id.* In response, the Company has not wasted any time developing and executing a strategy to improve its performance.

In the Commission’s September 26, 2024 Order in the present case, it identified this recommendation as a safety issue and directed the Company to answer specific questions about it and other safety issues. As directed, the Company agrees that this recommendation is related to a potential safety concern tied to downed wires. The Company understands that the intent of this recommendation is for the Company to establish a timeline to reach the wire-down secure time in the Commission’s service quality standards and to hold itself accountable to this standard by reporting progress on this goal to management. The Company agrees that this recommendation can help the Company address this potential safety concern by increasing transparency and accountability across the organization as the Company improves wire-down response performance.

Before discussing Liberty’s recommendation and the Company’s proposed plans to implement the recommendation in further detail, some background of wire-down event definitions and standards is helpful. The Company classifies downed wires as either “a first responder guarded downed wire” (i.e. a downed wire guarded by a firefighter or police officer), see Mich Admin Code, R 460.723(1) and (2), or as a downed wire not guarded by a first responder. The Company

assesses wire-down performance across three conditions: Normal, Gray Sky, and Catastrophic. Mich Admin Code, R 460.722(b)-(d). The Commission also considers the “amalgamation of data from all conditions.” Mich Admin Code, R 460.722(a).

In April 2023, the MPSC updated its guidance and performance expectations for first responder guarded downed wires to shorten response times as follows:

Wire Down Relief Requests	
Number of minutes to respond to a request for relief of a first responder guarded downed wire at least 90% of the time	Revised Rules
Metropolitan Area	120 minutes
Non-Metropolitan Area	180 minutes

The “[w]ire-down relief factor,” which the Company typically refers to as its performance metrics, is the “the annual percentage of the first responder guarded downed wires that are relieved by an electric utility or cooperative representative within [these] time period[s].” Mich Admin Code, R 460.703(w). For a downed wire not guarded by a first responder, the MPSC has stated the electric utilities have a duty to respond in the quickest manner possible for these events but has not further elaborated on performance expectations. Mich Admin Code, R 460.723(3) and (4). The Company, in the rest of this response, focuses on current and forecasted performance and expected timelines and impacts of proposed plans to relieve first responders and secure the downed wires they are guarding. These plans will also have an impact on response times for downed wires not guarded by first responders.

The Company’s most recent performance relieving first responders guarding downed wires has trended positively. From July 14, 2024 to October 19, 2024, for a total of 12 of the 13 weeks in that timeframe, the Company met performance expectations. In the week in which the Company

did not meet performance expectations, damage caused by a Catastrophic storm front and the tornados it spawned in late August hampered the Company's ability to reach downed wires. Barring an unusual number of storms like the August 2024 storm, the Company's current plans have it on a glidepath to meet the MPSC's wire-down relief metrics by the end of 2025.

The Company is currently working to improve its first-responder wire down performance through the following process improvements and technology upgrades:

- Order Management Simplification – The Company previously used two separate work order types for wire down events. There was one order type when more than one hazard existed and another type for exactly one hazard (i.e. a one-to-one ratio of hazard to work order). The Company performed 12% worse for the orders that had more than one hazard on a single order. To help address this performance issue, the process is being adjusted in the fourth quarter of 2024 such that all orders will be manually setup as one-to-one hazards in the field.
- OMS On-Site Time Automation – Historically, the Company's wire down performance has been impacted by individuals reporting and checking in from the field. The Company's training and policies stipulated that an individual had to manually enter a first-responder release time when an individual arrived at the location to start data tracking for the metric. This opened the door to human error that led to data errors that did not reflect actual field performance, which negatively impacted the Company's performance metric. This is changing in 2024 as the Company is automating updates that will improve this data collection to more accurately reflect field performance. This automation will include wire-down prediction technology that will be a part of the Company's OMS systems.
- ADMS Upgrades – The Company is working on upgrading its ADMS system. New ADMS upgrades will leverage Supervisory Control and Data Acquisition ("SCADA") and AMI to more accurately predict where there is a wire down, which will also enable automatic de-energization. These changes are expected to be done in the fourth quarter of 2024.

Cumulatively, these complementary initiatives will improve the Company's wire down response performance. Through these initiatives, the Company estimates that its wire-down performance will improve by 12% in 2024 above its 2023 performance levels. If this trend

continues, the Company will meet its compliance requirements by the end of 2025.

To ensure that the Company meets its performance objectives for first-responder wire down performance, the Restoration Management team regularly provides reporting to internal stakeholders and leadership on its first-responder wire down performance in several ways. The most prominent means is the Service Restoration Rally Room, which facilitates quicker response times using the following tactics and tools:

- Visible Metrics – The Company’s performance on this metric, and many others, are constantly refreshed, which allows the Company to easily track its progress toward meeting its wire-down objective.
- Problem Definition & Key Performance Indicator (“KPI”) Tree – Through the Problem Definition and KPI Tree, the Company is better able to improve root cause analyses and identify areas of improvement.
- Cross-Functional Governance Teams – Within the Rally Room there are cross-functional governance teams that are focused on restoration efforts and performance to MPSC metrics in a productive manner.

Liberty’s report highlighted opportunities for the Company to improve its wire-down response times. The Company is taking advantage of these opportunities by improving its processes and upgrading its technology. These improvements are being implemented in 2024, after which the metric’s performance will be tracked through reporting channels like the Rally Room for continued accountability as Liberty recommended. The Company expects to meet the MPSC wire-down relief metric by the end of 2025 barring an unusual number of catastrophic storms.

AA. Emergency Planning and Response – Restoration Budgeting – Recommendation 9: The Company’s Proposal in Its Ongoing Electric Rate Case is Consistent with Liberty’s Recommendation.

The Company uses a five-year historical average of its service restoration costs to project its test-year restoration spending level on which rates are based, if approved. The Company has

been using a five-year average since late 2020 after Staff, the Attorney General, and the Association of Businesses Advocating Tariff Equity (“ABATE”) proposed the five-year average and the Commission adopted it. The Commission rejected the Company’s “argument that a three-year average captures unusually high restoration costs in recent years,” holding that it was “precisely the reason that the Commission prefers a five-year average: a five-year average . . . tends to provide a more accurate projection because it flattens, but does not eliminate, the effects of unusually high cost years due to a cycle of damaging weather.” MPSC Case No. U-20697, December 17, 2020 Order, page 176. Upon reflection, it is now evident that the “unusually high cost years” of yesterday are today’s low-cost years. As Company witness Andrew R. Snider illustrated in his testimony in Case No. U-21585, service restoration costs since 2020 have skyrocketed, driven by increasingly severe weather:

Figure 2

Service Restoration Expense Detail						
Year	2019	2020	2021	2022	2023	5 Yr. Average
O&M Outlay / Exhibit A-106 (MPK-14)	\$92,128,638	\$71,262,140	\$159,659,269	\$113,270,739	\$188,041,326	\$124,872,422
Reimbursements (VRM, Insurance)		\$3,843,476	\$9,000,000			
Total Expense	\$92,128,638	\$75,105,616	\$168,659,296	\$113,270,739	188,041,326	\$127,441,123

Liberty recognized this, concluding, “It is not clear how a five-year average serves as a sound basis for setting budgets or a meaningful marker for sharing restoration costs that vary from five-year averages.” Liberty’s Report, Part II, page 115. Further emphasizing this point, Liberty said, “Absent adjustments to ‘normalize’ weather experienced over the historical measurement period, it is difficult to see how budgets provide to management what they should do, which is to establish both a sound resource planning base and a reasonable means for assessing performance effectiveness.” *Id.* This led Liberty to state bluntly that “[r]eliance on five-year historical costs to establish restoration budgets should end” and to recommend that the Company “[r]e-baseline restoration budgeting to produce estimates that *fully and realistically consider expected needs.*”

Id. at 117 (emphasis added). The Company agrees that restoration budgeting should fully and realistically consider the Company’s expected restoration needs. The Company recognizes the opportunity to close a gap between planned restoration spending and actual restoration costs and has proposed a mechanism to help make progress achieving this in the ongoing electric rate case.

The Company’s proposal in Case No. U-21585 combines a five-year average base expense level – even though it is likely to result in rates that do not reflect the Company’s service restoration expenses actually incurred in the projected test year – with a cost-sharing mechanism. The mechanism would allow the Company and customers to reasonably split the risk that storm restoration costs will be above or below the base amount included in rates. This proposal honors the spirit and letter of Liberty’s recommendation.

Whatever the result of the ongoing case, however, the Company will propose an expense amount in its next rate case that seeks a realistic restoration budget that fully considers the Company’s expected needs, consistent with Liberty’s findings on this issue.

BB. Emergency Planning and Response – Restoration Budgeting – Recommendation 10: The Company has Proposed Solutions that Reasonably Balance Company and Customer Interests in Addressing Highly Volatile Restoration Costs.

In addition to proposing budgeting that fully and realistically considers expected needs, Liberty said the Company should “balance company and customer interests in addressing highly volatile restoration costs.” Liberty’s Report, Part II, page 118. In support of this recommendation, Liberty discussed reasonable expectations for the future, the need to balance risks and rewards between the Company and customers, and a possible deferral mechanism that serves this purpose:

Most significantly, the use of five years of historical restoration costs as a benchmark for sharing between the Company and customers ignores the fact that the system will steadily respond better as time passes to outages that require material restoration. *It should not be taken for granted that escalation and worsening weather will overcome the reliability and resiliency gained by*

billions of dollars spent over that historical period or the many more that will be spent through the course of the EDIIP as proposed by Consumers. The analytical foundation proposed by the preceding recommendation should provide a more realistic weather, system strength and resiliency, and cost escalation underpinnings for sound projections of future annual storm restoration costs requirements. *Absent those underpinnings, we would not place confidence in concluding that a five-year average cost benchmark balances risks and rewards evenly between the Company and customers.*

In the meantime, deferral accounting for excess storm costs may *offer a solution for avoiding customer costs for adverse weather that does not materialize, while preventing significant Company economic loss when such weather requires significantly more than costs included in revenue requirements for ratemaking purposes. . . . [Id. (emphasis added).]*

The Company agrees with Liberty's assessment. Company witness Snider echoed Liberty's thoughts in support of the Service Restoration Cost Sharing Mechanism in his direct and rebuttal testimony in the ongoing rate case. In his rebuttal testimony in that case, he explained how the Company's proposed mechanism balances the Company's and customers' interests:

With the Company's proposed mechanism in place, when the weather is unpredictably bad, customers can be assured that the Company will have access to the resources needed to quickly restore customers' power. Conversely, if weather is unpredictably good, resulting in lower restoration expense than the amount included in base rates, customers will receive a financial benefit under the mechanism. The proposed mechanism appropriately balances the risk of variations in storm restoration expense between the Company and customers. [MPSC Case No. U-21585, 5 TR 2546.]

The mechanism is aligned with Liberty's recommendation, and if the Commission does not ultimately approve it in the ongoing rate case, perhaps it would address Liberty's recommendation in this docket by helping the Company understand how it can, in Liberty's words, "balance[] risks and rewards evenly between the Company and customers."

CC. Outage Communications – Recommendation 1: The Company Will Continue to Focus on Improving ETRs and the Customer Outage Experience.

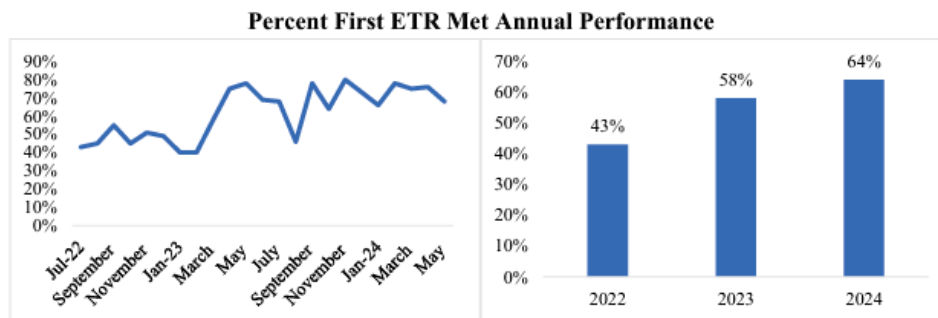
In discussing Consumers Energy’s Estimated Times of Restoration (“ETRs”) for customers, Liberty recognized that it may not “always be feasible” for the Company to provide “[p]recise service restoration times,” and it correctly observed that relaying “the best available information provides substantial support for customers and local governments in planning and responding to extended service disruptions.” Liberty’s Report, Part II, page 134. Historically, ETR updates were manually entered into the OMS by field crews or dispatchers, but in 2019 the Company introduced the ETR Machine Learning Model (“ETR MLM” or “AutoETR”). As Liberty described it, “The initial AutoETR version used historical data to *calculate average restoration times . . .*” *Id.* (emphasis added). Now, AutoETR *predicts restoration times* for customers who have lost power. Version 2 of the ETR model used “variables such as the number of local and statewide incidents, day of the week, hour of the day, and region to estimate restoration times.” *Id.* at 135.

As AutoETR has matured, there have been growing pains, but Liberty recognized the significant progress the Company has made and the extraordinary success it is experiencing now. After storms in 2021, 2022, and 2023 interrupted service, Company research revealed that many customers were dissatisfied with outage communications. Liberty’s Report, Part II, page 140. This research underscored the need for accurate and reliable messaging. It also revealed that customer satisfaction hinged not only on the frequency and duration of outages but also on the accuracy of the first ETR and the number of ETRs they receive. *Id.* at 138-139. The Company learned from these experiences and its research, leading to ETR improvements that are “better focused on customer needs and expectations.” *Id.* at 142. Indeed, the Company is receiving industry recognition for its efforts. It won the Silver Outage Communications Award from

Chartwell for its AutoETR process and was presented the award on June 4, 2024.

In October 2023, the Company enhanced the ETR process by launching the ETR Control Panel used to impose reasonable guardrails on AutoETR’s machine learning predictions – like a cap on the latest restoration date the system will allow – that can be configured for each situation or storm. Liberty’s Report, Part II, pages 135-136. Liberty highlighted the Company’s success since October 2023 increasing the percent of first ETRs met:

Since October 2023, Consumers has further enhanced its ETR communication processes by introducing the ETR Control Panel and implementing daily monitoring and reporting of Percent First ETR Met performance. These improvements seem to have positively influenced monthly and annual First Estimate Accuracy, as demonstrated in the charts below. [Liberty’s Report, Part II, page 142.]



Liberty also described the Company’s efforts to monitor and improve ETR reliability, which measures the difference between actual and estimated restoration times. Liberty correctly concluded that “ETR Reliability has shown significant progress in 2024, with *the average difference now around 8 hours, compared to over 30 hours in previous years.*” Liberty’s Report, Part II, page 142 (emphasis added).

Consumers Energy appreciates Liberty’s feedback and agrees that recent ETR improvements have allowed the Company to better meet customer needs and expectations. Consumers Energy also agrees with the recommendation to focus on further improving ETRs and customers’ outage experience. Consistent with this recommendation, the Company will continue

to monitor and measure ETR accuracy and reliability daily, weekly, monthly, and yearly through the ETR daily operating review (“DOR”) Power BI reports (Power BI is a visual-management tool designed to convert raw data into actionable intelligence). ETR metric performance is also reviewed and discussed during WORs.

Since the Liberty audit, the ETR Team has added new features to the ETR Control Panel that provide additional “levers” that can be used during storms to improve ETR accuracy. Additionally, the training data (data input into the AutoETR model expanding the information available to machine learning to make predictions) was refreshed through August 2024, and a new version of the ETR Model (version 3.0) was deployed to production on October 11, 2024. This version includes a model update to a new version with added features and optimization, as well as a new directive for the Control Panel to handle Split jobs.⁸ New features in version 3.0 include Area of Fault (equipment where outage occurred – for example, transformer, primary, or other) and customer-count features. Consumers Energy is also exploring an upgrade to Kubra 4.0 (an IT platform used for customer alerts) that would provide additional communication tools and enhancements to existing processes, which should improve the customer experience and engagement levels.

Liberty also recommended that the Company “persist in engaging with customers through post-storm meetings, forums, panels, and surveys to gain insights into their needs and adjust communication strategies accordingly.” Liberty’s Report, Part II, page 143. Indeed, the Company is actively engaging with customers by leveraging post storm surveys sent to emergency officials in the Company’s service territory. This is part of the Company’s standard work, which is covered

⁸ In ADMS, an existing outage can be split into multiple jobs; without this new directive, the customers that were split into new job(s) would receive a new ETR. Now, they will inherit the previous ETR and prevent the customer from receiving a new ETR.

in its “Emergency Officials Survey Procedure.” These surveys identify areas of improvement that the Company takes seriously and acts on to improve our customers’ experience during a storm. In the Company’s most recent large storm that occurred in August 2024, almost 70% of the respondents stated they were satisfied with the Company. Negative themes focused on crews estimated time of arrival (“ETA”) communicated to emergency officials, communication in general, requests for a dedicated line to report new outages, and concerns with dashboard. Positive feedback highlighted timely and professional communication from the Company, improving crew responses times considering the extent of storm damage, and helpful information found in the dashboard.

The Company is taking action based on survey results, including further focusing on ways for responders to feel confident that the most critical hazards are prioritized – this may include a priority line providing callbacks with status updates. The Company is also improving the reliability and functionality of the dashboard while promoting awareness of the tool. Finally, the Company may also promote self-serving reporting tools over phone calls, ensuring reporters are confident that these options will still be prioritized the same as phone calls but will be more efficient for both parties.

DD. Outage Communications – Recommendation 2: The Company Does Communicate with Customers Requiring Medical Equipment Before Storms.

Concerning Consumers Energy’s communications with customers who have medical needs, Liberty noted, “Consumers encourages customers with specialized medical equipment to enroll in the Red Cross Identification program via the Consumers website. Consumers does not offer specialized communications specifically for customers with medical equipment” Liberty’s Report, Part II, page 134. This finding led Liberty to recommend that the Company “implement proactive, targeted communication strategies for these priority customers, especially

before storms.” *Id.* at 143. Liberty correctly concluded that by informing these customers “about impending weather and ensuring they have appropriate contingency plans, Consumers can enhance their safety and provide a more tailored customer experience.” *Id.*

In the Commission’s September 26, 2024 Order in the present case, it identified this recommendation as a safety issue and directed the Company to answer specific questions about it and other safety issues. As directed, the Company agrees that this recommendation is related to a potential safety concern, although it does not agree that Liberty’s recommendation is the best means to address it. Consumers Energy understands the need to talk to customers with medical needs about looming weather before it strikes so that they can prepare for possible service interruptions. Early intervention is critical for customers with medical conditions, and indeed for all customers, which is why the Company communicates repeatedly with all customers about severe weather that could impact its service territory. The Company’s communication strategy is the best and most cost-effective way to deliver information to customers who need it.

Although the Company shares Liberty’s desire to ensure that customers with medical needs are well-informed, the Company already has processes and programs in place designed to achieve this objective:

- a. Through the Company’s Critical Care⁹ and the Red Cross Identification programs¹⁰, it communicates with all customers – not just those with a medical tag – before a storm about potential power outages in their region. The Company connects with customers via earned media (print, broadcast, radio), its website, social media channels, and customer email in accordance with the Company’s Storm Playbook.
- b. The Company’s Storm Playbook, which features the pre-storm communications just mentioned, was in the pilot phase during the audit but is now fully operational. See Attachment 2 to these Comments. One provision in the Playbook, which is relevant to Liberty’s recommendation, calls for the Company to escalate vulnerable customer concerns (e.g. calls from a senior citizen home or a customer with a lifesaving device)

⁹ <https://www.consumersenergy.com/outages-and-safety/life-support>

¹⁰ <https://www.consumersenergy.com/-/media/CE/Documents/Customer%20Forms/2333.pdf>

to ensure the right team members are dedicated to resolving the issue.¹¹

Consumers currently has 301 customers in the Critical Care program and can accommodate more. The Company is also evaluating changes given data, resources, and customer preferences.

A cross functional workgroup met to discuss this finding in September to reevaluate the systems currently in place to explore opportunities to improve current processes. One issue the workgroup discussed was the Red Cross Identification program's anticipated sunset. The Company is working with the Red Cross to continue partnering with them in the future in new ways. Currently, the Company sends a form to customers who need medical equipment or have medical needs in order to connect them with the Red Cross who can help them plan for a power outage. In the future, the Company will no longer send a form to the customer but direct them to the Company's and the Red Cross's websites. These websites outline the steps the customer can take to develop their own plan, with resources to help, including a checklist for the customer to use when a storm comes. The Company will have a plan for customers who don't have access to the web.

If required to implement a targeted communication strategy for priority customers, as Liberty recommended, the Company would need to fill some data gaps. Consumers Energy currently does not have a uniform contact system for each customer. For example, someone enrolled in Critical Care might only have a phone number on file and not an email, making broad communications outreach to them more difficult. Additionally, if they are not signed up for text alerts, the Company would need to call them individually to provide the information. Before a new system could be implemented, the Company would need to do a broad analysis of each customer's contact information, ensure it is up to date, have the necessary paperwork confirming

¹¹ The Company will continue to monitor the tactics in the Playbook through the end of the year and through 2025 to ensure customers are receiving the information they need.

the medical need from a doctor is on file, and ensure they are signed up to receive alerts and communications from the Company (currently only a small percentage are).

In addition to programs for customers, the Company plans ahead as much as possible to ensure customers know a storm is coming, where it may impact, and how they can prepare. However, despite the preparation, the weather is not always predictable, and there are times when a storm strikes areas of the state with little advance warning. It is not uncommon for a storm to change course or impact a region more than originally predicted. In these circumstances, individualized, pre-storm communications are very difficult, particularly given time constraints.

The Company recommends that the Commission allow it to monitor its current Storm Playbook, which was recently put in action, to determine if the process works to alert customers. If the Company needs to change course, it would require a year to gather and scrub needed data, enroll customers in outage alerts, and develop a cohesive customer experience. As explained above, the Company currently does not have comprehensive information for each customer.

If a new system is needed, before it could be implemented, the Company would need to update each customer's contact information, ensure they are signed up for text alerts, and confirm they have submitted the necessary paperwork from a doctor confirming the medical need.

The Commission should also consider the costs to customers, which would take at least two forms:

- i. The cost of Contact Service Representatives ("CSRs") dedicated to this project to gather, audit, validate, and finalize the customer data.
- ii. Overtime pay for CSRs for time spent contacting customers before a storm (for those who do not have emails or text alerts on file).

In sum, Consumers Energy has robust communication strategies and tactics to alert all customers when medium or large storms threaten to interrupt service. Using existing processes that are effective for providing information to customers at a lower budget produces a mutually

beneficial solution for all.

EE. Outage Communications – Recommendation 3: The Company Is Committing to Regular Stress Testing as Liberty Recommended.

Consumers Energy tests its outage communications systems and technologies through “extensive application testing to simulate various storm scenarios and peak loads on critical systems.” Liberty’s Report, Part II, page 128. The Company calls these stress tests Day-in-the-Life (“DIL”) testing. DIL tests “identify areas for improvement by revealing opportunities to adjust parameters and streamline storm support processes.” *Id.* Liberty found that the Company needs to perform DIL testing more frequently to avoid untested system modifications that are put to the test during storms. *Id.* at 141. During the audit, the Company “acknowledged the importance of regular DIL testing” and informed Liberty that it is “exploring the feasibility of implementing it as a standard practice.” *Id.* at 144. Liberty recommended DIL testing as a standard practice, encouraging the Company to “[v]erify capacity sufficiency and hardening of outage communications systems and technologies through regular stress . . . testing.” *Id.* at 143.

The Company is already halfway to satisfying Liberty’s recommendation with plans to continue its progress. According to Liberty, the Company’s “most recent DIL test was completed in May 2024, with plans for additional tests in September and October 2024 to assess SAP and ADMS upgrades.” Liberty’s Report, Part II, page 144. It continued, “This approach will help ensure that Consumers’ communication systems can effectively manage both everyday operations and major events, safeguarding a high-quality customer experience.” *Id.* The Company agrees and plans to ensure the “capacity sufficiency and hardening of outage communication systems and technologies” by performing DIL testing on a regular cadence throughout the year.

FF. Outage Communications – Recommendation 4: The Company Will Continue to Monitor ETR Accuracy and Reliability and Seek Improvements to the Model to Improve Both Metrics.

Liberty recommends that Consumers Energy “monitor and measure accuracy and reliability in creating, updating, and communicating ETRs.” Liberty’s Report, Part II, page 144. This recommendation stems from its findings about the Company’s history using ETRs to predict customer restoration times and its more recent performance. In response to Part II of Liberty’s Report, Chapter IV, Recommendation 1, the Company discussed this history and recent experience. See discussion *supra*, pages 73-76. This history and recent experience reveal that ETR accuracy and reliability has improved exponentially. The Company intends to build on this progress. And for this reason, it agrees with Liberty’s recommendation and will continue to monitor and measure ETR accuracy and reliability daily, weekly, monthly and yearly through the ETR DOR Power BI report. ETR metric performance is also reviewed and discussed during WORs.

As the Company explained in response to Part II of Liberty’s Report, Chapter IV, Recommendation 1, since the Liberty Audit, the ETR Team has added new features to the ETR Control Panel that provide additional “levers” that can be used during storms to improve ETR accuracy. Additionally, the training data was refreshed through August 2024, and a new version of the ETR Model (version 3.0) was deployed to production on October 11, 2024. This version includes a model update to a new version with added features and optimization, as well as a new directive for the Control Panel to handle Split jobs. New features in version 3.0 include Area of Fault and customer-count features.

Consumers Energy is also exploring an upgrade to Kubra 4.0 that would provide additional communication tools and enhancements to existing processes, which should improve the customer experience and engagement levels.

IV. CONCLUSION

Since Consumers Energy first learned about this audit, its objectives have not waivered nor has its resolve faltered. As the Company said in its November 4, 2022 Report in this docket, it is serious about the work it has done and plans to do to keep the public and its coworkers safe from downed wires, reduce the number of power outages during storms and severe weather, restore power quickly to customers when they lose it, and keep customers informed. If the Commission is selective in adopting Liberty's recommendations, Liberty's constructive recommendations can help the Company achieve these objectives and Liberty's few unconstructive recommendations need not hinder the Company's progress. If the Commission rejects the unconstructive recommendations and supports the Company's plan to pursue better plans, the Company can confidently move forward knowing that its plans are right for customers and that it has the Commission's support.

Respectfully submitted,

CONSUMERS ENERGY COMPANY

ATTACHMENT 1

MICHIGAN PUBLIC SERVICE COMMISSION

Case No: U-21305
 Utility: Consumers Energy Company
 Date: November 15, 2024
 Attachment: 1 of 1

Consumers Energy Company
 Liberty's Audit Report's Line Clearing Cycle Recommendation Expense Estimation
 2025-2028 Total Expenses, Annual Average, and Incremental Annual Increase Over U-21585 Projection

Line No.	(a) Description	(b) Cycle Length (Years)	(c)	(d)
1	<u>2025-2028 O&M Expense Category¹</u>	<u>Cycle Length (Years)</u>	5	4
2	Total LVD			
3	Contractor Cost per Mile ²		\$ 14,617	\$ 14,617
4	Line Clearing Miles		54,240	61,000
5	Capital Clearing Miles ³		1,300	1,300
6	O&M Clearing Miles		52,940	59,700
7	Contractor Clearing Costs		\$ 773,823,980	\$ 872,634,900
	Additional Outsource Expenses (Per Diems and Contractor Crew Rate Increase) ⁴		\$ 89,280,000	\$ 112,080,000
9	Demand + Herbicide ⁵		\$ 24,020,000	\$ 24,020,000
10	Distribution Salaries and Distribution Contract Planning ⁶		\$ 36,192,000	\$ 40,368,000
11	Distribution Expenses ⁷		\$ 8,528,000	\$ 9,512,000
12	LVD Line Clearing Costs (O&M)		\$ 931,843,980	\$ 1,058,614,900
13	Total LVD + HVD			
14	HVD Program Line Clearing Costs (O&M) ⁸		\$ 47,211,540	\$ 47,211,540
15	LVD + HVD Total Line Clearing Costs (O&M)		\$ 979,055,520	\$ 1,105,826,440
16	Average Annual LVD + HVD			
17	Line Clearing Costs (O&M)		\$ 244,763,880	\$ 276,456,610
18	Crewing Required		782	877
19	U-21585 Projected Average Annual LVD + HVD (7-Year Effective Cycle for LVD)			
20	Program Line Clearing Costs (O&M) ⁹		\$ 125,076,385	\$ 125,076,385
21	Crewing Required		468	468
22	Incremental Annual Increase Over U-21585 Projection			
23	Additional Costs to Meet Recommendation		\$ 119,687,495	\$ 151,380,225
24	Additional Crews Needed to Meet Recommendation		314	409

¹ 2025 spend will be determined by the outcome of U-21585

² Source: U-21585 projected 2025 clearing cost per mile isolated to contractor costs only

³ Source: U-21585 Exhibit A-47 (PLB-1) line 34, columns (m) through (p)

⁴ Assumes 410 crews can be acquired at an in-state labor rate and crewing needs above 410 would be at an elevated cost of \$30 more per crew hour

⁵ Source: U-21585 Exhibit A-47 (PLB-1) lines 18 and 19, columns (m) through (p)

⁶ Assumes a current staffing baseline of 57 Full-Time Equivalent ("FTE") employees and adds one FTE for every \$2 million increase in annual contractor spend

⁷ Assumes a consistent ratio of distribution expenses to distribution salaries and distribution contract planning expenses as utilized in Case No U-20697 Formal Optimization Analysis of Line Clearing Cycles

⁸ Source: U-21585 Exhibit A-47 (PLB-1) line 2, columns (m) through (p)

⁹ Source: U-21585 Exhibit A-47 (PLB-1) line 24, columns (m) through (p)

ATTACHMENT 2

Consumers Energy

STORM COMMUNICATIONS PLAYBOOK

Edition: 2024



CMS ENERGY

Consumers Energy

Count on Us[®]

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EXECUTIVE SUMMARY

The following document is meant to be a guide for any electric restoration event and includes any external communication or company message that falls under the Public Information Officer.

Goals:

- Implement round the clock, proactive communications to customers in an outage event.
- At the direction of the PIO, execute accurate, customer-focused messages in external communications during an outage event.
- Ensure the process remains uniform no matter who is serving in the PIO or subsequent roles.
- Align with the Crisis Communications Plan but provide more in-depth tools and tactics.

Metrics:

- Plan Adherence: ensure PIO follows the plan below and subsequent tactics to achieve goals.
- Media Sentiment: track all media inquiries, interviews and coverage of the company in the storm to determine published stories and sentiment values based on the size of the storm. Exact metric to be determined during 2024 data gathering.
- Social Media: Achieve 50,000 impressions per post
- Social Media Engagement: Achieve 5% engagement rate
- CIO: Monitor leading indicators (weather projections, customer incidents, outage numbers) to determine customer tactic activation.
- Trigger Ads: Ensure 100% accuracy of triggering MPSC required safety ads within the 15 min window.

Why?:

Through customer research following storm events, we know customers want 1) accurate information about the status of their outage, 2) information on what could happen (delays or updates) and 3) see progress toward their restoration. They seek that information out through a variety of communications channels managed by the PIO in storm settings. This plan dials up what we have previously done to support outage communications within a company ICS event by engaging with the public and customers before the storm starts and increases the communications during the storm. For large storms, depending on where they live, customers could hear from us up to 93 times on 9 channels every 24-hour period, an 11% increase over previous storms.

New Tactics:

Past	Tactic	Future
As needed	ICS Comms Calls	Scheduled twice a day for storms over 100K
	ICS Comms Summaries	
Only Storms over 50K projected	Pre-Storm Advisory	Added in Density factor for smaller storms *NEW
4x a day at 50K or higher	News Releases	Same threshold but added in Density factor for smaller storms *NEW
As needed	News Conferences	Virtual at the start of the storm and in person at hardest hit locations in subsequent days *NEW
Started in 2023. Rarely used	Stakeholder Calls	Standard developed for cadence and development of materials/data *NEW
MPSC Requirement	Triggering Safety Ads	MPSC Requirement
Over 50K	Pulling other ads from Market	Over 50K
	Reporting/gathering information on high profile outages	Worked with IT and Community Affairs to develop an app to eliminate waste for the PIO *NEW
	Stakeholder Emails	Developing standard for 2024 *NEW
	Arranging media interviews/stand ups	Standard developed for cadence and development of tactic *NEW
	Emails to Customers	
	Web Banners/Outage Banner	
See Community Response Team Standards for more details	Customer Activations	See Community Response Team Standards for more details
Used for storms over 100K	Photography/Video/Approvals	Used for storms over 100K
	ICS Documentation: ICS 201 and Communications Action Plan	
As needed	Officer Media Schedule	Developing standard for 2024 taking into account size of storm and length of restoration *NEW
	ICS Alignment: Attend all ICS required meetings	
Used but no standard	CEO Updates	Developing a standard for when and how the CEO activities during a storm *NEW
As needed	Overall Messaging Updates	Developing standard for 2024 *NEW

SMALL STORM – 0 to 50,000 Customers Out

Day 1: Key Messages

- What happened? Focus on weather details, where the damage is.
- Safety: down wire, slow down go around, generator safety.
- Restoration Process: talk to how the weather just moved out of territory and now we began damage assessment.
- Crewing Data: provide any crewing data available, including numbers and shifts.
- Thank You: Thank customers for their patience.

PIO	Social Media	Community Affairs
<p>ICS Activation: Activate at the level needed given the scope of work.</p> <p>Trigger Safety Ads.</p> <p>Customer: align with CIO.</p> <p>ETRs: quick connect on projected ETRs.</p> <p>News Release: Only activate if we reach 50K cumulative or if 40% of the county is w/out service, high levels of downed wires.</p> <p>Media Calls: Field media requests.</p> <p>Comms Coordination: Send ICS Executive Summaries to ICS Comms List in Outlook with storm updates.</p> <p>ICS Role: Fill out necessary paperwork, attend EOC calls.</p> <p>Community Affairs: Touch base with Josh/Dani/ impacted CAM.</p>	<p>PAUSE POSTING ON ALL OTHER CHANNELS, including Nextdoor.</p> <p>Facebook posts: Two per day, published tentatively at 10 am and 7 pm, as localized as possible. Utilize damage photos to highlight story, User Generated Content is acceptable here if permission is given.</p> <p>Facebook and Instagram stories: Highlight safety messages.</p> <p>Tweets: Update on restoration activities following news release cadence.</p> <p>Nextdoor: Post only if storm damage is heavily concentrated in a county/counties we have access to post in.</p> <p>NOTE: Everyone who thanks our crews for their work should be replied to.</p>	<p>STANDARD: With an exception to natural disasters or emergencies the community response team will use the first 24 hours after a storm is active to observe/ assess damage, ETR's.</p> <p>If after 24 hours it has been determined that an activation is needed the PIO, CRO and CAM will determine if activation is needed.</p>

CIO	Brand On Call	Co-Worker Connections
<p>Connect with PIO on storm predictions.</p> <p>Attend ICS calls (auto scheduled).</p> <p>Send Emails and turn on banner as explained in Matrix.</p> <p>Attend and participate in PIO Comms Calls.</p> <p>Issue pre-storm email between Noon and 4 pm if we expect the outage to last more than 3 days.</p>	<p>Review the dashboard hourly during a storm event to identify counties with 10 or more downed wires.</p> <p>If a county has 10 or more downed wires, turn on trigger ads. Counties meeting this criterion must have ads running from 6 a.m. – 11 p.m. (or until restored – less than 10 wire downs).</p> <p>Update the PIO whenever ads are started or stopped to ensure alignment.</p> <p>Provide a detailed report to the PIO and finance officer at 11 pm with list of counties, total spend, total impressions.</p>	<p>Creating/curating press releases placing on Connect.</p> <p>Include Storm highlight in the next BTL.</p>

SMALL STORM – 0 to 50,000 Customers Out

Day 2: Key Messages

- What happened? Focus on weather details, where the damage is.
- Safety: down wire, slow down go around, generator safety.
- Crewing Data: any updates on increased crew numbers.
- Restoration Process: Damage Assessment is complete, Hardest Hit Areas.
- Thank You: Thank customers for their patience.
- ETRs: If known, alert customers to ETR.
- Photos: crews in the field restoring power.

PIO	Social Media	Community Affairs
<p>Continue with any tactic from Day 1.</p> <p>Check in with SWIC on other tactics needed such as ICS Comms Call, Customer Communication, Activation, if the restoration event will go into Day 3.</p>	<p>Facebook posts: One per day, as localized as possible Highlight number restored, total number of people working on restoration (including tree trim, logistics, customer service, etc.), estimated time for all to be restored.</p> <p>Utilize photos of our crews in action to highlight story, User Generated Content is acceptable here if permission is given.</p> <p>Facebook stories: Highlight safety messages.</p> <p>Tweets: Update on restoration activities following news release cadence.</p> <p>Nextdoor posts: Focus on appreciation for everyone involved in restoration, mimic the audience used for our Day 1 post.</p>	<p>Work with CRO to determine activation needs, location and type as advised.</p> <p>Serve as media spokesperson for storm activations (as needed).</p> <p>Continue with any tactic from Day 1.</p>

CIO	Brand On Call	Co-Worker Connections
<p>Continue with any tactic from Day 1.</p>	<p>Continue with any tactic from Day 1.</p>	<p>Continue with any tactic from Day 1.</p>

SMALL STORM – 0 to 50,000 Customers Out

Day 3: Key Messages

- Work is complete.
- We appreciate our lineworkers, others in the field and customers as we worked to clean up the event.
- Photos: crews in the field restoring power

PIO	Social Media	Community Affairs
Continue tactics from Day 2 unless work is cleaned up.	<p>Consider a thank you post across all channels with a focus on the crews who did the work and to our customers for their patience. Best to send when we are under 5,000 storm outages.</p> <p>Resume organic social media 24 hours after we have less than 5,000 storm related outages. If all blue-sky advertisements and emails have been paused, give channel owners time they can return to business as usual.</p>	Continue with any tactic from Day 2.

CIO	Brand On Call	Co-Worker Connections
Continue with any tactic from Day 2.	Continue with any tactic from Day 2.	Continue with any tactic from Day 2.

Day 4: PIO Completes Demobilization Checklist

PIO	Social Media	Community Affairs
Complete Demobilization Items.	Nothing needed as work is wrapped up.	Continue with any tactic from Day 3.

CIO	Brand On Call	Co-Worker Connections
Continue with any tactic from Day 3.	Continue with any tactic from Day 3.	Find feel good company stories to share in BTL or Connect.

STORM – 50,000 to 100,000 Customers Out

PRE-STORM

- Weather Projections.
- Our crews are preparing to respond to severe weather -- locations where they are pre-staged, how many we have.
- Safety Tips.

PIO	Social Media	Community Affairs
<p>Develop advisory (see template below) to send to media outlets in expected area of storm impact featuring approved safety messages. Send early in the day that bad weather is expected to hit, or the day before.</p> <p>Send note to ICS Communications Team with expected storm impact and a copy of the media advisory. Identify who will serve as PIO and CIO for what periods of time.</p> <p>Connect with CIO, brand on-call and community affairs (Josh/Dani) to ensure they're informed and aligned before storm hits.</p> <p>Connect with Operations Officers to determine availability/location for the duration of the event.</p>	<p>Posting begins up to 48 hours before an anticipated storm event.</p> <p>Key social messages: We have the right plan and people in place. Safety is a focus for everyone, including customers. Utilize self-service channels for individualized updates.</p> <p>Channels and cadence:</p> <p>Facebook in-feed, 1 updated daily.</p> <p>Facebook stories, up to five per day.</p> <p>Nextdoor: one post prior to storm event (only available in select areas).</p> <p>TwitterX: up to five times per day.</p> <p>Consider pausing all non-storm social posts for duration of anticipated storm.</p>	<p>STANDARD: With an exception to natural disasters or emergencies the community response team will use the first 24 hours after a storm is active to observe/assess damage, ETR's. If after 24 hours it has been determined that an activation is needed the PIO, CRO and CAM will determine if activation is needed.</p> <p>Reach out to impacted city officials and or community leaders to address any emergent needs related to outage impact.</p> <p>Escalate Community Issues: (Municipal buildings, police, fire, jails, pump stations, water towers, hospitals, etc.) or inquiries from emergency managers should be directed to the on-call Liaison Officer and cc the PIO.</p> <p>Escalate Major Employers/Manufacturing Operations: These situations will need to be escalated to the business center (if open) and then cc the PIO. If the business center is not open, escalations should be sent to the PIO. PIO will escalate to the EOC.</p> <p>Escalate Vulnerable Customers: For example, if a senior citizen home lost power, or an impacted customer has a lifesaving device that requires power, escalate to the PIO, and the PIO will be responsible for working through these situations with the EOC.</p> <p>Participate in the PIO ICS Storm Calls.</p> <p>Note: see Community Response Team Standards process doc for full activation threshold scope.</p>

PRE-STORM

CIO	Brand On Call	Co-Worker Connections
<p>Connect with PIO on storm predictions.</p> <p>Attend ICS calls (auto scheduled).</p> <p>Send Emails and turn on banner as explained in Matrix.</p> <p>Attend and participate in PIO Comms Calls.</p> <p>Issue pre-storm email between Noon and 4 pm with approved safety messages if we expect the outage to last more than 3 days.</p>	<p>STANDARD: Organic social media posts, paid ads/social and marketing emails are paused when we reach 50k outages (determination made by Public Information Officer {PIO} and Social Media Lead) – all non-storm communications should be paused within 60 min of notification.</p> <p>Review the dashboard hourly during a storm event to identify counties with 10 or more downed wires.</p> <p>If a county has 10 or more downed wires, turn on trigger ads.</p> <p>Counties meeting this criterion must have ads running from 6 a.m. – 11 p.m. (or until restored – less than 10 wire downs).</p> <p>Update the PIO whenever ads are started or stopped to ensure alignment.</p> <p>Provide a detailed report to the PIO and finance officer at 11 pm with list of counties, total spend, total impressions.</p>	<p>Creating/curating press releases placing on Connect.</p> <p>Include storm highlight in the next BTL.</p> <p>Participate in the PIO ICS Storm Calls.</p>

STORM – 50,000 to 100,000 Customers Out

Day 1: Key Messages

- What happened? Focus on weather details, where the damage is.
- Safety: down wire, slow down go around, generator safety.
- Restoration Process: talk to how the weather just moved out of territory and now we began damage assessment.
- Crewing Data: provide any crewing data available, including numbers and shifts.
- Thank You: Thank customers for their patience.

PIO	Social Media	Community Affairs
<p>ICS Activation: activate at the level needed given the scope of work. For 50K, the PIO needs to alert the ICS Comms list, brand on call and CIO.</p> <p>Safety Ads: Check Storm Dashboard/Align with Brand on call Rep.</p> <p>Customer: Align with CIO on call to determine if there are any customer issues.</p> <p>News Releases: Based on when we reach 50K active outages (not cumulative), decide when the first release will be. Cadence: 5 am; 11 am; 4:30 pm; 9 pm</p> <p>Media Calls: Field requests from media outlets.</p> <p>Comms Coordination: Send ICS Executive Summaries to the ICS Comms List in Outlook.</p> <p>ICS Role: Attend all Large Storm Calls and report out on PIO Activities.</p> <p>ICS Role: Fill out ICS Form 201, Communications Action Plan, if requested.</p> <p>Community Affairs: Touch base with Josh/Dani if activation or local call is needed.</p>	<p>When we are crossing 50,000 outages, recommend PIO and CIO trigger process for pausing all non-storm digital and social ads.</p> <p>Key social messages: Safety, damage was extensive, our crews are working. Damage only photos acceptable only for first 24 hours of a storm event!</p> <p>Channels and cadence: Facebook up to 2 in-feed posts.</p> <p>Facebook stories, up to five per day. Twitter/X: up to five updates per day.</p> <p>NO NEXTDOOR POSTS RECOMMENDED.</p> <p>Reschedule all blue-sky organic social media posts for the duration of the outage event.</p>	<p>Work with CRO to determine activation needs, location and type as advised.</p> <p>Request support from the PIO for advisories on the activation. Connect with social media.</p> <p>Share Morning and Afternoon Updates (will receive from PIO) with stakeholder list in each county.</p>

CIO	Brand On Call	Co-Worker Connections
<p>Continue with any tactic from Day 1.</p> <p>Prepare safety customer email, get approval from PIO.</p> <p>Change outage banner to safety message.</p>	<p>Continue with any tactic from Day 1.</p> <p>In consultation with the PIO, review the need for a photographer to go out in the field.</p>	<p>Continue with any tactic from Day 1.</p>

STORM – 50,000 to 100,000 Customers Out

Day 2: Key Messages

- What happened? Focus on weather details, where the damage is.
- Safety: down wire, slow down go around, generator safety.
- Crewing Data: any updates on increased crew numbers.
- Restoration Process: Damage Assessment is complete, type of work needed.
- Thank You: Thank customers for their patience.
- Customer Info: Hardest hit areas, ETR (if we have it).

PIO	Social Media	Community Affairs
<p>Continue with any tactic from Day 1.</p> <p>ICS Comms Call: Begin call once a day to align with internal stakeholders.</p> <p>Media: Evaluate the need for virtual press event or on-site media availability.</p> <p>Photos: Connect with Sarah or Darren to begin conversations about photographers in the field.</p> <p>ETRs: Connect with Anita or Nicholas on status of global ETRs.</p> <p>CIO: Connect with CIO on non-priority, high visibility outages (such as schools, polling locations) and develop a plan for escalation.</p>	<p>Key social messages: Safety, damage was extensive, our crews are working, storm restoration priorities for our crews. NOTE: Photos of crews working should be emphasized at this point of a storm. Crew photos from previous storms are acceptable.</p> <p>Channels and cadence: Facebook up to four in-feed posts per day.</p> <p>Facebook stories, up to five per day. Facebook events for activations as needed.</p> <p>Instagram reels/photos once per day. Twitter/X: up to five updates per day.</p> <p>One in-feed Nextdoor post per storm only for areas hardest hit, activation events on Nextdoor as locations warrant.</p> <p>Blog used for highlighting positive customer stories. Safety and restoration posts refreshed and ready to embed in news releases.</p>	<p>Continue with any tactic from Day 1.</p> <p>Work with CRO to determine activation needs, location and type as advised.</p> <p>Request support from the PIO for advisories on the activation.</p> <p>Connect with social media.</p> <p>Share Morning and Afternoon Updates (will receive from PIO) with stakeholder list in each county.</p>

CIO	Brand On Call	Co-Worker Connections
<p>Continue with any tactic from Day 1.</p> <p>Prepare activation customer email, get approval from PIO.</p>	<p>Continue with any tactic from Day 1.</p>	<p>Continue with any tactic from Day 1.</p>

STORM – 50,000 to 100,000 Customers Out

Day 3: Key Messages

- What happened? Focus on weather details, where the damage is.
- Safety: down wire, slow down go around, generator safety.
- Crewing Data: any updates on increased crew numbers, Mutual Assistance Support.
- Restoration Process: Type of work crews are seeing (replacing poles, more lines etc.)
- Thank You: Thank customers for their patience.
- Customer Info: hardest hit areas, ETR.

PIO	Social Media	Community Affairs
<p>Continue with any tactic from Day 2.</p> <p>Check in with SWIC at the start of each planning period for additional tactics.</p> <p>Media: If a public, media relations event didn't take place in Day 2, plan for one on Day 3.</p>	<p>IF FULL RESTORATION IS ANTICIPATED IN 24 HOURS: Prepare thank you post with a focus on hard work of all crews, including mutual aid, and for people's patience. This post should be published once we are below 5,000 storm-related outages.</p> <p>IF FULL RESTORATION IS ANTICIPATED IN MORE THAN 24 HOURS, SEE BELOW. Key social messages: Safety, damage was extensive, crews are working. Priority should be given to content that features crews actively working and/or executive in charge of storm answering questions out in the field.</p> <p>Channels and cadence:</p> <p>Facebook up to four in-feed posts per day.</p> <p>Facebook stories, up to five per day.</p> <p>Facebook events for activations as needed.</p> <p>Instagram reels/photos once per day.</p> <p>Twitter/X: up to five updates per day.</p> <p>One in-feed Nextdoor post per storm only for areas hardest hit, activation events on Nextdoor as locations warrant.</p> <p>Blog used for highlighting positive customer stories. Safety and restoration posts refreshed and ready to embed in news releases.</p>	<p>Continue with any tactic from Day 2.</p> <p>Share Morning and Afternoon Updates (will receive from PIO) with stakeholder list in each county.</p>

CIO	Brand On Call	Co-Worker Connections
<p>Continue with any tactic from Day 2.</p> <p>Prepare storm status customer email, get approval from PIO.</p> <p>Change outage banner to storm status update.</p>	<p>Continue with any tactic from Day 2.</p>	<p>Continue with any tactic from Day 2.</p>

STORM – 50,000 to 100,000 Customers Out

Day 4: PIO completes demobilization checklist.

- Safety: down wire, slow down go around, generator safety.
- Crewing Data: any updates on increased crew numbers, Mutual Assistance Support.
- Thank You: Thank customers for their patience.
- Customer Info: hardest hit areas, ETR.
- Wrapping Up: Wrapping up restoration work.

PIO	Social Media	Community Affairs
<p>Continue with any tactic from Day 3</p> <p>Decide on time of final news release: based on less than 10K customers out.</p> <p>Complete demobilization items.</p>	<p>Continue with appropriate tactics from Day 3</p>	<p>Continue with any tactic from Day 3</p> <p>Share Morning and Afternoon Updates (will receive from PIO) with stakeholder list in each county.</p>

CIO	Brand On Call	Co-Worker Connections
<p>Continue with any tactic from Day 3</p> <p>Turn banner off when customer count is below 10K</p>	<p>Continue with any tactic from Day 3</p>	<p>Find feel good company stories to share in BTL or Connect</p>

STORM –100,000 to 250,000+ Customers Out

PRE-STORM: Key Messages

- Weather Projections.
- What we expect to see?
- Length of Restoration.
- Crewing Resources: Mobilized in certain regions.

PIO	Social Media	Community Affairs
<p>Develop advisory (see template below) to send to media outlets in expected area of storm impact with approved safety messages. Send early in the day that bad weather is expected to hit, or the day before.</p> <p>Pre-stage 2-3 officers on morning radio the day of the storm to set the narrative.</p> <p>Schedule/direct/staff a pre-storm virtual media conference for outages projected to be over 100K.</p> <p>Send note to ICS Communications Team with expected storm impact and a copy of the media advisory.</p> <p>Identify who will serve as PIO and CIO for what periods of time.</p> <p>Connect with CIO, brand on-call and community affairs (Josh/Dani) to ensure they're informed and aligned before storm hits.</p> <p>Officers: Reach out to all officers and gather availability and location for restoration media purposes.</p>	<p>Posting begins up to 48 hours before an anticipated storm event.</p> <p>Key social messages: We have the right plan and people in place. Safety is a focus for everyone, including customers. Utilize self-service channels for individualized updates.</p> <p>Channels and cadence:</p> <p>Facebook in-feed, 1 updated daily.</p> <p>Facebook stories, up to five per day.</p> <p>Nextdoor: one post prior to storm event (only available in select areas).</p> <p>TwitterX: up to five times per day.</p> <p>Consider pausing all non-storm social posts for duration of anticipated storm.</p>	<p>STANDARD: With an exception to natural disasters or emergencies the community response team will use the first 24 hours after a storm is active to observe/assess damage, ETR's.</p> <p>If after 24 hours it has been determined that an activation is needed the PIO, CRO and CAM will determine if activation is needed.</p> <p>Reach out to impacted city officials and or community leaders to address any emergent needs related to outage impact.</p> <p>Escalate Community Issues: (Municipal buildings, police, fire, jails, pump stations, water towers, hospitals, etc.) or inquiries from emergency managers should be directed to the on-call Liaison Officer and cc the PIO.</p> <p>Escalate Major Employers/Manufacturing Operations: These situations will need to be escalated to the business center (if open) and then cc the PIO. If the business center is not open, escalations should be sent to the PIO. PIO will escalate to the EOC.</p> <p>Escalate Vulnerable Customers: For example, if a senior citizen home lost power, or an impacted customer has a lifesaving device that requires power, escalate to the PIO, and the PIO will be responsible for working through these situations with the EOC.</p> <p>Participate in the PIO ICS Storm Calls Note: see Community Response Team Standards process doc for full activation threshold scope.</p>

PRE-STORM

CIO	Brand On Call	Co-Worker Connections
<p>Connect with PIO on storm predictions.</p>	<p>STANDARD: Organic social media posts, paid ads/social and marketing emails are paused when we reach 50k</p>	<p>Creating/curating press releases placing on Connect.</p>

CIO	Brand On Call	Co-Worker Connections
<p>Attend ICS calls (auto scheduled).</p> <p>Send Emails and turn on banner as explained in Matrix.</p> <p>Attend and participate in PIO Comms Calls.</p> <p>Issue pre-storm email with approved safety emails between Noon and 4 pm if we expect the outage to last more than 3 days.</p>	<p>outages (determination made by Public Information Officer {PIO} and Social Media Lead) – all non-storm communications should be paused within 60 min of notification.</p> <p>Review the dashboard hourly during a storm event to identify counties with 10 or more downed wires.</p> <p>If a county has 10 or more downed wires, turn on trigger ads. Counties meeting this criterion must have ads running from 6 a.m. – 11 p.m. (or until restored – less than 10 wire downs).</p> <p>Update the PIO whenever ads are started or stopped to ensure alignment.</p> <p>Provide a detailed report to the PIO and finance officer at 11 pm with list of counties, total spend, total impressions.</p>	<p>Include storm highlight in the next BTL.</p> <p>Participate in the PIO ICS Storm Calls</p> <p>Draft all employee safety email warning co-workers of the pending weather.</p>

STORM –100,000 to 250,000+ Customers Out

Day 1: Key Messages

- What happened? Focus on weather details, where the damage is.
- Safety: down wire, slow down go around, generator safety.
- Restoration Process: talk to how the weather just moved out of territory and now we began damage assessment.
- Crewing Data: provide any crewing data available, including numbers and shifts.
- Thank You: Thank customers for their patience.

PIO	Social Media	Community Affairs
<p>ICS Activation: activate at the level needed given the scope of work. For 50K, the PIO needs to alert the ICS Comms list, brand on call and CIO.</p> <p>Safety Ads: Check Storm Dashboard/Align w/ Brand on call Rep.</p> <p>Customer: Align with CIO on call to determine if there are any customer issues.</p> <p>News Releases: Based on when we reach 50K, decide when the first release will be. Cadence: 5 am; 11 am; 4:30 pm; 9 pm.</p> <p>Media Calls: Field requests from media outlets.</p> <p>Assign Officer (not officer in charge or CEO) to Day 1 morning interviews.</p> <p>Comms Coordination: Send ICS Executive Summaries to the ICS Comms List in Outlook.</p> <p>ICS Role: Attend all Large Storm Calls and report out on PIO Activities.</p> <p>ICS Role: Fill out ICS Form 201.</p> <p>Community Affairs: Touch base with Josh/Dani if activation is needed.</p> <p>Photos: Connect with Sarah or Darren to begin conversations about photographers in the field.</p> <p>ETRs: Connect with Anita or Nicholas on status of global ETRs.</p>	<p>When we are crossing 50,000 outages, recommend PIO and CIO trigger process for pausing all non-storm digital and social ads.</p> <p>Key social messages: Safety, damage was extensive, our crews are working. Damage only photos acceptable only for first 24 hours of a storm event!</p> <p>Channels and cadence:</p> <p>Facebook up to 2 in-feed posts.</p> <p>Facebook stories, up to five per day.</p> <p>Twitter/X: up to five updates per day.</p> <p>Nextdoor: Wait until Day 2 unless we have an especially hard hit county.</p> <p>Reschedule all blue-sky organic social media posts for the duration of the outage event.</p>	<p>Work with CRO to determine activation needs, location and type as advised.</p> <p>Request support from the PIO for advisories on the activation.</p> <p>Connect with social media.</p> <p>Continue with any tactic from pre-storm.</p> <p>Share Morning and Afternoon Updates (will receive from PIO) with stakeholder list in each county.</p> <p>Continue local escalations</p>

CIO	Brand On Call	Co-Worker Connections
Continue with any tactic from Day 1.	Continue with any tactic from Day 1.	Continue with any tactic from Day 1.

Prepare activation customer email, get approval from PIO.

CEO: if possible have GJR record video from job site or service center garage to include in external and internal communications.

Draft all employee email requesting storm volunteers.

STORM –100,000 to 250,000+ Customers Out

Day 2: Key Messages

- What happened? Focus on weather details, where the damage is.
- Safety: down wire, slow down go around, generator safety.
- Crewing Data: any updates on increased crew numbers.
- Restoration Process: Damage Assessment is complete, Hardest Hit Areas.
- Thank You: Thank customers for their patience.
- Customer Info: Hardest hit areas, ETR (if we have it).

PIO	Social Media	Community Affairs
<p>Continue with any tactic from Day 1.</p> <p>Media Availability: Schedule virtual news conference with officers.</p> <p>Coordinate with community affairs, state and federal governmental affairs on possible briefings for lawmakers and community leaders.</p> <p>Promote individual community activation events with outreach to local media outlets.</p> <p>Designate team members to staff activation events where possible.</p> <p>CEO Public Events: Work with the Office of the CEO to get the CEO out at activations or press events for when active outages over 250K.</p> <p>Messaging Materials: Develop a messaging guide (TPs, FAQs), update daily and share with stakeholders.</p>	<p>Key social messages: Safety, damage was extensive, our crews are working, storm restoration priorities for our crews. NOTE: Photos of crews working should be emphasized at this point of a storm. Crew photos from previous storms are acceptable.</p> <p>Channels and cadence: Facebook up to four in-feed posts per day.</p> <p>Facebook stories, up to five per day.</p> <p>Facebook events for activations as needed.</p> <p>Instagram reels/photos once per day.</p> <p>Twitter/X: up to five updates per day.</p> <p>One in-feed Nextdoor post per storm only for areas hardest hit, activation events on Nextdoor as locations warrant.</p> <p>Blog used for highlighting positive customer stories. Safety and restoration posts refreshed and ready to embed in news releases.</p>	<p>Continue with any tactic from Day 1 Work with CRO to determine activation needs, location and type as advised.</p> <p>Request support from the PIO for advisories on the activation.</p> <p>Connect with social media</p> <p>Serve as media spokesperson for storm activations (as needed).</p> <p>Share Morning and Afternoon Updates (will receive from PIO) with stakeholder list in each county.</p> <p>Determine hardest hit counties either by total customers without power, hazards, or longest ETRs and schedule external stakeholder virtual briefing with Officers.</p> <p>Continue local escalations</p>

CIO	Brand On Call	Co-Worker Connections
<p>Continue with any tactic from Day 1.</p> <p>Prepare activation customer email, get approval from PIO.</p>	<p>Continue with any tactic from Day 1.</p>	<p>Continue with any tactic from Day 1.</p> <p>Draft all employee email requesting storm volunteers.</p>

STORM –100,000 to 250,000+ Customers Out

Day 3: Key Messages

- What happened? Focus on weather details, where the damage is.
- Safety: down wire, slow down go around, generator safety
- Crewing Data: any updates on increased crew numbers, Mutual Assistance Support.
- Restoration Process: Type of work crews are seeing (replacing poles, more lines etc.).
- Thank You: Thank customers for their patience.
- Customer Info: hardest hit areas, ETR update.

PIO	Social Media	Community Affairs
<p>Continue with any tactic from Day 2.</p> <p>Check in with SWIC at the start of each planning period for additional tactics specific to the storm.</p> <p>Mobile Command Center Press Visit with Officers.</p> <p>CEO Public Events: Work with the Office of the CEO to get the CEO out at activations or press events on day 3 if between 100-200K.</p>	<p>IF FULL RESTORATION IS ANTICIPATED IN 24 HOURS: Prepare thank you post with a focus on hard work of all crews, including mutual aid, and for people's patience. This post should be published once we are below 5,000 storm-related outages.</p> <p>IF FULL RESTORATION IS ANTICIPATED IN MORE THAN 24 HOURS, SEE BELOW. Key social messages: Safety, damage was extensive, crews are working. Priority should be given to content that features crews actively working and/or executive in charge of storm answering questions out in the field.</p> <p>Channels and cadence:</p> <p>Facebook up to four in-feed posts per day.</p> <p>Facebook stories, up to five per day.</p> <p>Facebook events for activations as needed. Instagram reels/photos once per day. Twitter/X: up to five updates per day.</p> <p>One in-feed Nextdoor post per storm only for areas hardest hit, activation events on Nextdoor as locations warrant.</p> <p>Blog used for highlighting positive customer stories. Safety and restoration posts refreshed and ready to embed in news releases.</p>	<p>Continue with any tactic from Day 2.</p> <p>Share Morning and Afternoon Updates (will receive from PIO) with stakeholder list in each county.</p> <p>Serve as media spokesperson for storm activations (as needed).</p> <p>Continue external stakeholder virtual briefings with officers in hardest hit counties.</p> <p>Continue local escalations</p>

CIO	Brand On Call	Co-Worker Connections
<p>Continue with any tactic from Day 2.</p> <p>Prepare storm status customer email, get approval from PIO.</p> <p>Change outage banner to storm status update.</p>	<p>Continue with any tactic from Day 2.</p>	<p>Continue with any tactic from Day 2.</p> <p>Draft all employee email with storm update.</p>

STORM –100,000 to 250,000+ Customers Out

Day 4: Key Messages

- Safety: down wire, slow down go around, generator safety
- Crewing Data: any updates on increased crew numbers, Mutual Assistance Support.
- Thank You: Thank customers for their patience.
- Customer Info: hardest hit areas, ETR update.
- Tone: Very apologetic.

PIO	Social Media	Community Affairs
<p>Continue with any tactic from Day 3.</p> <p>Check in with SWIC at the start of each planning period for additional tactics specific to the storm.</p> <p>Visit hardest hit area (damage or substation) with media/ officers for continued public presence.</p>	<p>IF FULL RESTORATION IS ANTICIPATED IN 24 HOURS: Prepare thank you post with a focus on hard work of all crews, including mutual aid, and for people's patience. This post should be published once we are below 5,000 storm-related outages.</p> <p>IF FULL RESTORATION IS ANTICIPATED IN MORE THAN 24 HOURS, SEE BELOW.</p> <p>Key social messages: Safety, damage was extensive, crews are working. Priority should be given to content that features crews actively working and/or executive in charge of storm answering questions out in the field.</p> <p>Channels and cadence:</p> <p>Facebook up to four in-feed posts per day.</p> <p>Facebook stories, up to five per day.</p> <p>Facebook events for activations as needed.</p> <p>Instagram reels/photos once per day.</p> <p>Twitter/X: up to five updates per day.</p> <p>One in-feed Nextdoor post per storm only for areas hardest hit, activation events on Nextdoor as locations warrant.</p> <p>Blog used for highlighting positive customer stories. Safety and restoration posts refreshed and ready to embed in news releases.</p>	<p>Continue with any tactic from Day 3.</p> <p>Share Morning and Afternoon Updates (will receive from PIO) with stakeholder list in each county.</p> <p>Serve as media spokesperson for storm activations (as needed).</p> <p>Continue external stakeholder virtual briefings with officers in hardest hit counties.</p> <p>Continue local escalations</p>

CIO	Brand On Call	Co-Worker Connections
Continue with any tactic from Day 3.	Continue with any tactic from Day 3.	Continue with any tactic from Day 3.

STORM –100,000 to 250,000+ Customers Out

Day 5: Key Messages

- Safety: down wire, slow down go around, generator safety.
- Crewing Data: any updates on increased crew numbers, Mutual Assistance Support.
- Thank You: Thank customers for their patience.
- Customer Info: hardest hit areas, ETR update.
- Tone: Very apologetic.

PIO	Social Media	Community Affairs
<p>Continue with any tactic from Day 4.</p> <p>Check in with SWIC at the start of each planning period for additional tactics specific to the storm.</p> <p>Taking local media outlets to a job site with a crew to get footage.</p> <p>OPTION B: Get Video to get footage and shop it out to media.</p>	<p>IF FULL RESTORATION IS ANTICIPATED IN 24 HOURS: Prepare thank you post with a focus on hard work of all crews, including mutual aid, and for people's patience. This post should be published once we are below 5,000 storm-related outages.</p> <p>IF FULL RESTORATION IS ANTICIPATED IN MORE THAN 24 HOURS, SEE BELOW.</p> <p>Key social messages: Safety, damage was extensive, crews are working. Priority should be given to content that features crews actively working and/or executive in charge of storm answering questions out in the field.</p> <p>Channels and cadence:</p> <p>Facebook up to four in-feed posts per day.</p> <p>Facebook stories, up to five per day.</p> <p>Facebook events for activations as needed.</p> <p>Instagram reels/photos once per day.</p> <p>Twitter/X: up to five updates per day.</p> <p>One in-feed Nextdoor post per storm only for areas hardest hit, activation events on Nextdoor as locations warrant.</p> <p>Blog used for highlighting positive customer stories. Safety and restoration posts refreshed and ready to embed in news releases.</p>	<p>Continue with any tactic from Day 4.</p> <p>Share Morning and Afternoon Updates (will receive from PIO) with stakeholder list in each county.</p> <p>Serve as media spokesperson for storm activations (as needed).</p> <p>Continue external stakeholder virtual briefings with officers in hardest hit counties.</p> <p>Continue local escalations</p>

CIO	Brand On Call	Co-Worker Connections
Continue with any tactic from Day 4.	Continue with any tactic from Day 4.	Continue with any tactic from Day 4.

STORM –100,000 to 250,000+ Customers Out

Day 6: Key Messages

- Safety: down wire, slow down go around, generator safety.
- Crewing Data: any updates on increased crew numbers, Mutual Assistance Support.
- Thank You: Thank customers for their patience.
- Customer Info: hardest hit areas, ETR update
- Tone: Very apologetic

PIO	Social Media	Community Affairs
<p>Continue with any tactic from Day 5.</p> <p>Check in with SWIC at the start of each planning period for additional tactics specific to the storm.</p> <p>One on ones with interested media at EOC/Service Center.</p>	<p>IF FULL RESTORATION IS ANTICIPATED IN 24 HOURS: Prepare thank you post with a focus on hard work of all crews, including mutual aid, and for people's patience. This post should be published once we are below 5,000 storm-related outages.</p> <p>IF FULL RESTORATION IS ANTICIPATED IN MORE THAN 24 HOURS, SEE BELOW.</p> <p>Key social messages: Safety, damage was extensive, crews are working. Priority should be given to content that features crews actively working and/or executive in charge of storm answering questions out in the field.</p> <p>Channels and cadence:</p> <p>Facebook up to four in-feed posts per day.</p> <p>Facebook stories, up to five per day.</p> <p>Facebook events for activations as needed.</p> <p>Instagram reels/photos once per day.</p> <p>Twitter/X: up to five updates per day.</p> <p>One in-feed Nextdoor post per storm only for areas hardest hit, activation events on Nextdoor as locations warrant.</p> <p>Blog used for highlighting positive customer stories. Safety and restoration posts refreshed and ready to embed in news releases.</p>	<p>Continue with any tactic from Day 5.</p> <p>Share Morning and Afternoon Updates (will receive from PIO) with stakeholder list in each county.</p> <p>Serve as media spokesperson for storm activations (as needed).</p> <p>Continue external stakeholder virtual briefings with officers in hardest hit counties.</p> <p>Continue local escalations</p>
CIO	Brand On Call	Co-Worker Connections
Continue with any tactic from Day 5.	Continue with any tactic from Day 5.	Continue with any tactic from Day 5.

STORM –100,000 to 250,000+ Customers Out

Day 7: Key Messages

- Safety: down wire, slow down go around, generator safety.
- Crewing Data: any updates on increased crew numbers, Mutual Assistance Support.
- Thank You: Thank customers for their patience.
- Customer Info: hardest hit areas, ETR update.
- Tone: Very apologetic.

PIO	Social Media	Community Affairs
<p>Continue with administrative tasks from Day 6.</p> <p>Decide on time of final news release: based on less than 10K customers out.</p> <p>Complete demobilization items.</p>	<p>IF FULL RESTORATION IS ANTICIPATED IN 24 HOURS: Prepare thank you post with a focus on hard work of all crews, including mutual aid, and for people's patience. This post should be published once we are below 5,000 storm-related outages.</p> <p>IF FULL RESTORATION IS ANTICIPATED IN MORE THAN 24 HOURS, SEE BELOW. Key social messages: Safety, damage was extensive, crews are working. Priority should be given to content that features crews actively working and/or executive in charge of storm answering questions out in the field.</p> <p>Channels and cadence:</p> <p>Facebook up to four in-feed posts per day.</p> <p>Facebook stories, up to five per day.</p> <p>Facebook events for activations as needed.</p> <p>Instagram reels/photos once per day.</p> <p>Twitter/X: up to five updates per day.</p> <p>One in-feed Nextdoor post per storm only for areas hardest hit, activation events on Nextdoor as locations warrant.</p> <p>Blog used for highlighting positive customer stories. Safety and restoration posts refreshed and ready to embed in news releases.</p>	<p>Continue with any tactic from Day 6.</p> <p>Share Morning and Afternoon Updates (will receive from PIO) with stakeholder list in each county.</p> <p>Serve as media spokesperson for storm activations (as needed).</p> <p>Continue external stakeholder virtual briefings with officers in hardest hit counties.</p> <p>Continue local escalations</p>

CIO	Brand On Call	Co-Worker Connections
<p>Continue with any tactic from Day 6.</p> <p>Turn banner off when customer count is below 10K</p>	<p>Continue with any tactic from Day 6</p> <p>Complete post storm report</p> <p>Turn on paused non-storm/digital/ social and marketing ads</p>	<p>Continue with any tactic from Day 6.</p> <p>Draft email thanking co-workers for their help during storm</p>

PIO/COMMUNICATIONS DEMOBILIZATION

Tasks

Gather and organize the following in the storm folder: News releases, media advisories, briefing memos, scripts, media clips.

Update media tracker with inquiries and interviews. Pull report from Meltwater.

Delegate (non-storm related) tasks or meetings to other Media Relations Team members.

Create a storm report for Lauren and turn around in 2 days. Include the following:

- 1) Overall summary - include new/different tactics and wins
- 2) Sentiment - % positive
- 3) Total media coverage: #
- 4) Pre-storm media coverage: #
- 5) During restoration media coverage: # (include both interviews, inquiries and stories from news releases)
- 6) Data from other teams (CIO, social, email, paid, web/digital)
- 7) Lessons Learned

Create audit library - populate template.

Schedule a meeting or send an after-action email to the ICS Comms group for what worked, what improvements should be made.

Gather data from ICS Comms AARs and participate in the official ICS After Action Review as PIO.

Attachments:

- [Crisis Communications Plan](#) (update coming Q3)
- [Photo Standard](#)
- [Trigger Ad Job Aid](#)
- [Pre-Storm Media Advisory Template](#)
- [News Release Template](#)
- Community Response Team Standards