

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter, on the Commission’s own motion, )  
to commence a collaborative to consider issues )  
related to implementation of effective new )  
technologies and business models. )  
\_\_\_\_\_ )

Case No. U-20898

At the November 21, 2024 meeting of the Michigan Public Service Commission in Lansing,  
Michigan.

PRESENT: Hon. Daniel C. Scripps, Chair  
Hon. Katherine L. Peretick, Commissioner  
Hon. Alessandra R. Carreon, Commissioner

**ORDER**

In the October 17, 2019 order in Case No. U-20645, the Commission established the MI Power Grid initiative in partnership with Governor Gretchen Whitmer. MI Power Grid is a focused, multi-year stakeholder initiative to maximize the benefits of the transition to clean, distributed energy resources (DERs) for Michigan residents and businesses. In the October 29, 2020 order in Case No. U-20898, the Commission launched the New Technologies and Business Models workgroup as part of Phase II of MI Power Grid, and provided guidance to the Commission Staff (Staff) and interested persons on the Commission’s objectives and expectations for this effort. Thereafter, the Staff convened numerous working group sessions, distributed surveys, received written comments, and provided draft reports. On December 1, 2021, the Staff filed the “MI Power Grid: New Technologies, Business Models, and Staff Recommendations Report” (Staff Report) in this docket. The Staff Report concluded with nine recommendations.

On July 27, 2022, the Commission issued an order in this docket (July 27 order) addressing the nine recommendations and soliciting comments on specific issues related to DERs. The Commission also directed Consumers Energy Company (Consumers), DTE Electric Company (DTE Electric), Indiana Michigan Power Company (I&M), Upper Peninsula Power Company (UPPCo), Alpena Power Company (Alpena), Northern States Power Company, a Wisconsin corporation (NSP-W), and Upper Michigan Energy Resources Corporation (UMERC) to file proposed Michigan-specific uniform benefit cost analysis (BCA) requirements no later than September 1, 2022, in this docket. July 27 order, p. 20. The Commission found that the proposal should include a societal cost test (SCT) as well as a utility cost test (UCT), and should be able to be used in multiple types of dockets including pilot proposals, distribution planning, and rate cases. July 27 order, pp. 8, 20. The Commission indicated that the proposed BCA requirements should be informed by the provisions of the National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources<sup>1</sup> (NSPM), tailored to Michigan’s regulatory structure and requirements. July 27 order, pp. 7-9; *see also*, September 8, 2022 order in Case No. U-20147, pp. 71-72. On August 23, 2022, the Commission issued an order in this docket (August 23 order) extending the deadline for the submission of the proposed BCA requirements to February 1, 2023, and narrowing the required proposal to one for use in evaluating pilots only. August 23 order, p. 3.

On February 1, 2023, DTE Electric and Consumers (the Companies) jointly filed Proposed Requirements and Further Guidance on Benefit-Cost Analyses for Pilot Initiatives (BCA proposal) in this docket. The BCA proposal was developed in cooperation with the Michigan Electric and

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<sup>1</sup> Available at: <https://www.nationalenergyscreeningproject.org/national-standard-practice-manual/> (accessed November 20, 2024). This document is sometimes referred to by commenters as the NSPM for DERs.

Gas Association (MEGA) and the Association of Businesses Advocating Tariff Equity (ABATE). On January 31, 2023, I&M filed comments in support of the BCA proposal. On February 3, 2023, MEGA filed comments in support of the BCA proposal on behalf of Alpena, UMERCo, UPPCo, and NSP-W (I&M is a MEGA member but filed separately).<sup>2</sup> Among other items, the Companies proposed a jurisdiction-specific test (JST) for DERs, which takes a societal viewpoint of pilot costs and benefits, incorporating utility system, host customer, and societal value streams from the NSPM's impact inventory.

On April 24, 2023, the Commission issued an order in this docket (April 24 order) finding that the BCA proposal afforded a useful starting point for this process. The Commission provided an opportunity for interested persons to comment on the BCA proposal. April 24 order, p. 8. Comments were due by June 23, 2023. The Commission received timely comments from the Companies;<sup>3</sup> Michigan Energy Innovation Business Council and Advanced Energy United; ABATE; the Staff; MEGA; SEMCO Energy, Inc., d/b/a SEMCO ENERGY Gas Company; the American Council for an Energy-Efficient Economy; Recurve Analytics, Inc. and Energize Strategies; Midwest Energy Efficiency Alliance; and New York University School of Law Institute for Policy Integrity.

In the October 12, 2023 order in this docket (October 12 order), the Commission addressed the comments and provided further guidance on the BCA proposal. After considering the comments, the Commission directed the Staff to launch a collaborative for the purpose of developing a spreadsheet-based tool or similar open-source tool which is transparent, accessible to all, and relies

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<sup>2</sup> The April 24, 2023 order in this docket, pp. 6-7, contains a description of I&M's and MEGA's comments.

<sup>3</sup> For purposes of the comments, the Companies were joined by DTE Gas Company.

on well-understood standardized inputs (with flexibility) to act as a model for the required BCA that accompanies pilot applications. October 12 order, p. 30. The Commission recommended use of several additional sources of guidance for refinement of the BCA proposal, including for use in defining and incorporating equity-based considerations, and for use in the collaborative aimed at creation of the spreadsheet-based tool or similar open-source tool that would assist in providing transparency of inputs, outputs, and calculation methodology. *Id.*, pp. 28-30. The Commission also directed the collaborative to develop a jurisdiction-specific UCT and, where there is consensus to do so, to improve the SCT (that is, the JST as proposed by the Companies), stating that the “spreadsheet-based or similar open-source tool should have the flexibility to support the calculation of both the SCT and the UCT. The Commission is looking for clarity and transparency in both cost tests.” *Id.*, p. 30. The Commission stated that:

the development of the spreadsheet-based tool or similar open-source tool should be a collaborative process which includes the utilities, the Staff, and other stakeholders. Further information on this collaborative process will be provided via the New Technologies and Business Models workgroup webpage and listserv. . . . As the Staff notes, all interim pilot proposals shall include all inputs, assumptions, and calculations, and shall be accompanied by a non-proprietary, accessible, and transparent working model. Utilities may, in their discretion, use the framework laid out in this order in the interim until the completion of the development of the spreadsheet-based or similar open-source tool.

*Id.* (footnote omitted). The Commission directed the Staff to launch the collaborative and to have the new BCA platform ready for use in 2024.

The Staff has made significant progress in identifying sources of assistance in developing an open-source BCA tool that aligns with the stipulations contained in the October 12 order. Multi-state efforts with external partners are set to commence building a tool aligning with the NSPM and capable of modeling Michigan’s JST for DERs. The project is co-funded by the U.S. Department of Energy and E4TheFuture with ICF, Recurve, and Lawrence Berkeley National

Laboratory serving as project partners. The Staff plans to facilitate inclusive participation among interested parties in Michigan to support the tool's development. The Commission finds that additional time is required to carry out this mandate. Thus, the Commission directs the Staff to continue work on the development of a spreadsheet-based tool or similar open-source tool for conducting BCAs aligning with the NSPM and capable of modeling Michigan's JST for DERs, to be ready for use in 2026. The Commission notes that, in the interim, any pilot proposal analysis should include all inputs, assumptions, and calculations, and must be accompanied by a non-proprietary, accessible, and transparent working model. Utilities should also, to the extent possible, use the framework laid out in the October 12 order for the required BCA for DER pilots. Utilities should use applicable elements of the framework for BCAs for pilots covered by other topics/issues that arise in cases (non-DERs) to the extent possible. Further, the Commission directs the Staff to explore guidance for BCAs for non-DERs including identifying unique value streams potentially contributing to Michigan's associated JST(s).

THEREFORE, IT IS ORDERED that the Commission Staff shall continue work on the collaborative for the purpose of developing a spreadsheet-based or similar open-source tool which will begin establishing a new platform as a model for the required benefit-cost analysis that accompanies requests for pilots, to be ready for use in 2026. Further information on future opportunities for interested parties to collaborate in this process will be provided on the Commission's webpage and through the New Technologies and Business Models listserv.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, pursuant to MCL 462.26. To comply with the Michigan Rules of Court's requirement to notify the Commission of an appeal, appellants shall send required notices to both the Commission's Executive Secretary and to the Commission's Legal Counsel.

Electronic notifications should be sent to the Executive Secretary at [LARA-MPSC-Edockets@michigan.gov](mailto:LARA-MPSC-Edockets@michigan.gov) and to the Michigan Department of Attorney General - Public Service Division at [sheacl@michigan.gov](mailto:sheacl@michigan.gov). In lieu of electronic submissions, paper copies of such notifications may be sent to the Executive Secretary and the Attorney General - Public Service Division at 7109 W. Saginaw Hwy., Lansing, MI 48917.

MICHIGAN PUBLIC SERVICE COMMISSION

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Daniel C. Scripps, Chair

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Katherine L. Peretick, Commissioner

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Alessandra R. Carreon, Commissioner

By its action of November 21, 2024.

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Lisa Felice, Executive Secretary

# PROOF OF SERVICE

STATE OF MICHIGAN )

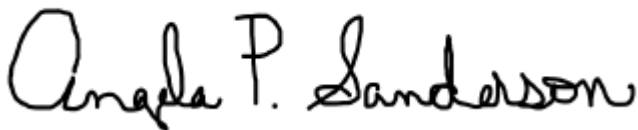
Case No. U-20898

County of Ingham )

Brianna Brown being duly sworn, deposes and says that on November 21, 2024 A.D. she electronically notified the attached list of this **Commission Order via e-mail transmission**, to the persons as shown on the attached service list (Listserv Distribution List).

  
Brianna Brown

Subscribed and sworn to before me  
this 21<sup>st</sup> day of November 2024.



Angela P. Sanderson  
Notary Public, Shiawassee County, Michigan  
As acting in Eaton County  
My Commission Expires: May 21, 2030

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| <a href="mailto:lchappelle@potomaclaw.com">lchappelle@potomaclaw.com</a>               | Chappelle, Laura                                    |
| <a href="mailto:rjohnson@cherrylandelectric.coop">rjohnson@cherrylandelectric.coop</a> | Cherryland Electric Cooperative                     |
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| <a href="mailto:mheise@cloverland.com">mheise@cloverland.com</a>                       | Cloverland  |
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| <a href="mailto:sarah.jorgensen@cmsenergy.com">sarah.jorgensen@cmsenergy.com</a>       | Consumers Energy Company                            |
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| <a href="mailto:lpage@dickinsonwright.com">lpage@dickinsonwright.com</a>               | Dickinson Wright                                    |
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| <a href="mailto:Neal.fitch@nrg.com">Neal.fitch@nrg.com</a>                             | Direct Energy                                       |
| <a href="mailto:Kara.briggs@nrg.com">Kara.briggs@nrg.com</a>                           | Direct Energy                                       |
| <a href="mailto:Ryan.harwell@nrg.com">Ryan.harwell@nrg.com</a>                         | Direct Energy                                       |
| <a href="mailto:mpscfilings@DTEENERGY.COM">mpscfilings@DTEENERGY.COM</a>               | DTE Energy  |
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| <a href="mailto:customer care@plymouthenergy.com">customer care@plymouthenergy.com</a> | ENGIE Gas & Power f/k/a Plymouth Energy             |



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| <a href="mailto:felice@MICHIGAN.GOV">felice@MICHIGAN.GOV</a>   | Felice, Lisa                                      |
| <a href="mailto:bgorman@FIRSTENERGYCORP.COM">bgorman@FIRSTENERGYCORP.COM</a>                           | First Energy                                      |
| <a href="mailto:phil@allendaleheating.com">phil@allendaleheating.com</a>                               | Forner, Phil                                      |
| <a href="mailto:dburks@glenergy.com">dburks@glenergy.com</a>   | Great Lakes Energy                                |
| <a href="mailto:slamp@glenergy.com">slamp@glenergy.com</a>   | Great Lakes Energy Cooperative                    |
| <a href="mailto:sculver@glenergy.com">sculver@glenergy.com</a>   | Great Lakes Energy Cooperative                    |
| <a href="mailto:lrgustafson@CMSENERGY.COM">lrgustafson@CMSENERGY.COM</a>                               | Gustafson, Lisa                                   |
| <a href="mailto:jhammel@hillsdalebpu.com">jhammel@hillsdalebpu.com</a>                                 | Hillsdale Board of Public Utilities               |
| <a href="mailto:coneill@homeworks.org">coneill@homeworks.org</a>                                       | HomeWorks Tri-County Electric Cooperative         |
| <a href="mailto:psimmer@HOMEWORKS.ORG">psimmer@HOMEWORKS.ORG</a>                                       | HomeWorks Tri-County Electric Cooperative         |
| <a href="mailto:mgobrien@aep.com">mgobrien@aep.com</a>   | Indiana Michigan Power Company                    |
| <a href="mailto:dan@megautilities.org">dan@megautilities.org</a>                                       | Integrays Group                                   |
| <a href="mailto:daustin@IGSENERGY.COM">daustin@IGSENERGY.COM</a>                                       | Interstate Gas Supply Inc                         |
| <a href="mailto:general@itctransco.com">general@itctransco.com</a>                                     | ITC Holdings                                      |
| <a href="mailto:kadarkwa@itctransco.com">kadarkwa@itctransco.com</a>                                   | ITC Holdings                                      |
| <a href="mailto:apascaris@itctransco.com">apascaris@itctransco.com</a>                                 | ITC Holdings                                      |
| <a href="mailto:jgoodman@commerceenergy.com">jgoodman@commerceenergy.com</a>                           | Just Energy Solutions                             |
| <a href="mailto:krichel@DLIB.INFO">krichel@DLIB.INFO</a>   | Krichel, Thomas                                   |
| <a href="mailto:dbodine@LIBERTYPOWERCORP.COM">dbodine@LIBERTYPOWERCORP.COM</a>                         | Liberty Power                                     |
| <a href="mailto:ham557@GMAIL.COM">ham557@GMAIL.COM</a>   | Lowell S.   |
| <a href="mailto:tlundgren@potomaclaw.com">tlundgren@potomaclaw.com</a>                                 | Lundgren, Timothy                                 |
| <a href="mailto:tcarpenter@mblp.org">tcarpenter@mblp.org</a>   | Marquette Board of Light & Power                  |
| <a href="mailto:suzy@megautilities.org">suzy@megautilities.org</a>                                     | MEGA  |
| <a href="mailto:dan@megautilities.org">dan@megautilities.org</a>                                       | MEGA  |
| <a href="mailto:mmann@USGANDE.COM">mmann@USGANDE.COM</a>   | Michigan Gas & Electric                           |
| <a href="mailto:shannon.burzycki@wecenergygroup.com">shannon.burzycki@wecenergygroup.com</a>           | Michigan Gas Utilities Corporation                |
| <a href="mailto:mrzwiers@INTEGRYSGROUP.COM">mrzwiers@INTEGRYSGROUP.COM</a>                             | Michigan Gas Utilities/Upper Penn Power/Wisconsin |
| <a href="mailto:kabraham@mpower.org">kabraham@mpower.org</a>   | Michigan Public Power Agency                      |
| <a href="mailto:JHDillavou@midamericanenergyservices.com">JHDillavou@midamericanenergyservices.com</a> | MidAmerican Energy Services, LLC                  |
| <a href="mailto:JCAltmayer@midamericanenergyservices.com">JCAltmayer@midamericanenergyservices.com</a> | MidAmerican Energy Services, LLC                  |
| <a href="mailto:LMLann@midamericanenergyservices.com">LMLann@midamericanenergyservices.com</a>         | MidAmerican Energy Services, LLC                  |
| <a href="mailto:dave.allen@TEAMMIDWEST.COM">dave.allen@TEAMMIDWEST.COM</a>                             | Midwest Energy Cooperative                        |
| <a href="mailto:terry.rubenthaler@teammidwest.com">terry.rubenthaler@teammidwest.com</a>               | Midwest Energy Cooperative                        |
| <a href="mailto:kerri.wade@teammidwest.com">kerri.wade@teammidwest.com</a>                             | Midwest Energy Cooperative                        |
| <a href="mailto:Marie-Rose.Gatete@teammidwest.com">Marie-Rose.Gatete@teammidwest.com</a>               | Midwest Energy Cooperative                        |
| <a href="mailto:meghan.tarver@teammidwest.com">meghan.tarver@teammidwest.com</a>                       | Midwest Energy Cooperative                        |
| <a href="mailto:d.motley@COMCAST.NET">d.motley@COMCAST.NET</a>   | Motley, Doug                                      |
| <a href="mailto:rarchiba@FOSTEROIL.COM">rarchiba@FOSTEROIL.COM</a>                                     | My Choice Energy                                  |
| <a href="mailto:customerservice@nordicenergy-us.com">customerservice@nordicenergy-us.com</a>           | Nordic Energy Services, LLC                       |
| <a href="mailto:karl.j.hoesly@xcelenergy.com">karl.j.hoesly@xcelenergy.com</a>                         | Northern States Power                             |
| <a href="mailto:esoumis@ontorea.com">esoumis@ontorea.com</a>   | Ontonagon County Rural Elec                       |
| <a href="mailto:mpauley@GRANGER.NET">mpauley@GRANGER.NET</a>   | Pauley, Marc                                      |
| <a href="mailto:mmpeck@fischerfranklin.com">mmpeck@fischerfranklin.com</a>                             | Peck, Matthew                                     |

## GEMOTION DISTRIBUTION SERVICE LIST

[bschlansker@PREMIERENERGYLLC.COM](mailto:bschlansker@PREMIERENERGYLLC.COM)

[MVanschoten@pieg.com](mailto:MVanschoten@pieg.com)

[aberg@pieg.com](mailto:aberg@pieg.com)

[johnbistranin@realgy.com](mailto:johnbistranin@realgy.com)

[BusinessOffice@REALGY.COM](mailto:BusinessOffice@REALGY.COM)

[mvorabout@ses4energy.com](mailto:mvorabout@ses4energy.com)

[rabaey@SES4ENERGY.COM](mailto:rabaey@SES4ENERGY.COM)

[cborr@WPSCI.COM](mailto:cborr@WPSCI.COM)

[jbelec@stephenson-mi.org](mailto:jbelec@stephenson-mi.org)

[kay8643990@YAHOO.COM](mailto:kay8643990@YAHOO.COM)

[regulatory@texasretailenergy.com](mailto:regulatory@texasretailenergy.com)

[bessenmacher@tecni.coop](mailto:bessenmacher@tecni.coop)

[James.Beyer@wecenergygroup.com](mailto:James.Beyer@wecenergygroup.com)

[Richard.Stasik@wecenergygroup.com](mailto:Richard.Stasik@wecenergygroup.com)

[jlarsen@uppc.com](mailto:jlarsen@uppc.com)

[estocking@uppc.com](mailto:estocking@uppc.com)

[manager@villageofbaraga.org](mailto:manager@villageofbaraga.org)

[Villagemanager@villageofclinton.org](mailto:Villagemanager@villageofclinton.org)

[jeinstein@volunteerenergy.com](mailto:jeinstein@volunteerenergy.com)

[leew@WVPA.COM](mailto:leew@WVPA.COM)

[tking@WPSCI.COM](mailto:tking@WPSCI.COM)

[Amanda@misostates.org](mailto:Amanda@misostates.org)

[Deborah.e.erwin@xcelenergy.com](mailto:Deborah.e.erwin@xcelenergy.com)

[Michelle.Schlosser@xcelenergy.com](mailto:Michelle.Schlosser@xcelenergy.com)

Premier Energy Marketing LLC

Presque Isle Electric & Gas Cooperative, INC

Presque Isle Electric & Gas Cooperative, INC

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