STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter, on the Commission's own motion, to establish a workgroup to investigate appropriate financial incentives and penalties to address outages and distribution performance moving forward.	)))))	Case No. U-21400

At the March 13, 2025 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

Background

In the April 24, 2023 order in this case (April 24 order), the Commission established the Financial Incentives and Disincentives workgroup as part of the MI Power Grid Initiative. April 24 order, p. 12. The April 24 order outlined the initial focus of the workgroup as:

> developing metrics relating to reliability including, but not limited to, SAIDI [system average interruption duration index] (including and excluding MEDs [major event days]), SAIFI [system average interruption frequency index], CEMI [customers experiencing multiple interruptions], CAIDI [customer average interruption duration index], and resilience, including, but not limited to, downed wire response and the frequency and duration of outages during extreme weather, [using] the recently updated Service Quality [and Reliability Standards for Electric Distribution Systems] rules as a baseline.

Id. In addition to developing metrics around reliability and safety, the Commission stated "the workgroup shall also consider challenges around the readiness of utility distribution grids to

effectively accommodate and leverage the increasing and further anticipated growth of distributed generation, EVs [electric vehicles], and other DERs [distributed energy resources]." *Id*.

On June 6, 2024, the Commission issued an order in this case (June 6 order) that, among other things, sought comment on several issues generally categorized as "reliability-plus," implying affected issues beyond core distribution reliability performance: equity, grid modernization, DER integration, and resilience. *Id*., pp. 31-32. Further, the Commission directed the Staff to convene another engagement session with interested persons to allow for reaction and feedback on these subjects.

From June 7 to August 23, 2024, a multitude of comments were filed in this docket by utilities, interested groups, and citizens regarding the updated straw proposal and the "reliability-plus" issues. Concurrently, in the Commission's distribution planning docket, Case No. U-20147, the Commission found that:

> [w]ith regard to appropriate metrics for DERs and their integration into future distribution plans, given the creation of the Financial Incentives and Disincentives workgroup since the issuance of the September 8[, 2022] order [in Case No. U-20147] and the correlation of DER metrics to the suite of metrics currently being considered by the workgroup, the Commission finds it appropriate for the Financial Incentives and Disincentives workgroup to evaluate potential appropriate metrics for DERs in the docket for Case No. U-21400. Following the identification and evaluation of appropriate DER metrics, these metrics can then be integrated into future distribution plans.

September 26, 2024 order in Case No. U-20147, pp. 133-134 (footnotes omitted).

On February 27, 2025, the Commission issued an order in this case (February 27 order) that summarized the initial and reply comments regarding the Staff's updated straw proposal and the additional "reliability-plus" issues on which the Commission requested comment. In the February 27 order, the Commission noted that:

> the initial focus of the Financial Incentives and Disincentives workgroup and the straw proposal was to be a "reliability-plus" approach to distribution grid

> performance, and "[w]ithin this focus on distribution performance, of foremost and most immediate concern are issues involving distribution reliability and safety." The Commission has reviewed the updated straw proposal and agrees with the Staff that "[i]mproving distribution system reliability still remains a high priority in the near-term," and that "[a]fter concluding this initial focus on reliability, the workgroup's scope can shift to the 'plus' portion of the Reliability-Plus framework envisioned in the opening order of this proceeding.

February 27 order, p. 27 (quoting updated straw proposal, p. 1 (footnote omitted)). Thus, in the February 27 order, the Commission approved a financial incentive/disincentive mechanism for Consumers and DTE Electric that focused on distribution reliability and safety, directed Consumers and DTE Electric to file a proposed mechanism as described in the order by April 15, 2025, and noted that "at this time, it has not yet directed I&M or other utilities to provide information regarding PBR [performance-based regulation] or performance metrics." February 27 order, p. 26.

Discussion

As discussed above, the Commission has an interest in "consider[ing] challenges around the readiness of utility distribution grids to effectively accommodate and leverage the increasing and further anticipated growth of distributed generation, EVs, and other DERs." April 24 order, p. 12. After reviewing prior comments in this docket and those filed in Case No. U-20147, the Commission has identified the following potential focus areas for feedback and consideration for future application of financial incentives and disincentives:

- DER interconnection;
- Customer data access and hosting capacity;
- DER aggregation and non-wires alternatives;
- 4.8 kilovolt distribution system conversions; and
- Advanced metering infrastructure utilization/grid modernization.

Additional detail on these topics and questions for which the Commission solicits feedback are included in the Reliability-Plus Framework Discussion Paper (Discussion Paper), attached to this order as Exhibit A. The Commission is specifically seeking input on whether the five proposed topic areas are the appropriate areas of focus, feedback on the proposed discussion items included under each of the proposed topic areas to guide the work of the Financial Incentives and Disincentives workgroup, feedback on proposed metrics contained in the Discussion Paper, suggestions on timing for this additional work on these "reliability-plus" elements, and any other related issues.

Accordingly, the Commission invites interested persons to comment on the topics listed above and described in more detail in the Discussion Paper. Written and electronic initial comments are due no later than 5:00 p.m. (Eastern time (ET)) on May 16, 2025. Written and electronic reply comments must be received no later than 5:00 p.m. (ET) on June 27, 2025. The written and electronic comments should be paginated and reference Case No. U-21400. Written initial and reply comments should be mailed to: Executive Secretary, Michigan Public Service Commission, P.O. Box 30221, Lansing, MI 48909. Comments submitted in electronic format may be filed via the Commission's E-Docket website, or for those persons without an E-dockets account, via e-mail to mpscedockets@michigan.gov. Any person requiring assistance prior to filing may contact the Staff at (517) 284-8090 or by e-mail at mpscedockets@michigan.gov. All comments submitted to the Commission in this matter will be filed in Case No. U-21400 and will become public information available on the Commission's website and subject to disclosure.

The Commission will review the initial and reply comments and provide additional guidance in this case.

THEREFORE, IT IS ORDERED that any interested person may file comments in Case No. U-21400 regarding the readiness of utility distribution grids to effectively accommodate and leverage the increasing and further anticipated growth of distributed generation, electric vehicles, and other distributed energy resources, and specifically regarding the topics of distributed energy resource interconnection, customer data access and hosting capacity, distributed energy resource aggregation and non-wires alternatives, 4.8 kilovolt distribution system conversions, and advanced metering infrastructure utilization/grid modernization, as described in the Reliability-Plus Framework Discussion Paper attached to this order as Exhibit A. Initial comments must be received no later than 5:00 p.m. (Eastern time) on May 16, 2025. Reply comments must be received no later than 5:00 p.m. (Eastern time) on June 27, 2025.

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 and to the Michigan Department of Attorney General - Public Service Division at sheac1@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

Daniel C. Scripps, Chair

Katherine L. Peretick, Commissioner

Alessandra R. Carreon, Commissioner

By its action of March 13, 2025.

Lisa Felice, Executive Secretary

Financial Incentives and Disincentives Workgroup Reliability-Plus Framework Discussion Paper

Background

In the April 24, 2023 order that opened this proceeding (April 24 order), the Commission directed the Financial Incentives and Disincentives ("FID") workgroup to develop a "reliability-plus" approach to distribution grid performance with an initial focus on distribution reliability and safety. To encourage discussion on this directive by interested parties, Commission Staff introduced a straw proposal for reliability performance metrics, which the workgroup reviewed through iterative rounds of comments and engagement sessions. After receiving this feedback, Commission Staff revised the straw proposal and posted an update in May 2024. In a subsequent order, the Commission requested further comments and an engagement session to discuss the revised proposal. On February 27, 2025, the Commission adopted the proposed reliability performance metrics with modifications (February 27 order).[1]

In addressing the remaining areas of the Reliability-Plus framework, the Commission stated, "the workgroup shall also consider challenges around the readiness of utility distribution grids to effectively accommodate and leverage the increasing and further anticipated growth of distributed generation, EVs, and other DERs."[2] In more recent guidance in Case No. U-20147, the Commission directed this workgroup to evaluate potential appropriate metrics for distributed energy resources.[3] The goal of this next stage of the FID workgroup discussions is to identify performance mechanisms to assess utility performance in meeting these new customer demands and maximize value from utilities' distribution systems.

Reliability-Plus Framework Focus Areas

After reviewing feedback in this proceeding and the Commission's directives in prior orders, this discussion paper identifies the following proposed focus areas:

- DER Interconnection,
- Customer Data Access and Hosting Capacity,

[1] The February 27 order approved the revised straw proposal for reliability performance metrics with modifications to the SAIDI (all weather) metric and required DTE and Consumers to track reliability in MiEJ80 census tracts. The Commission also directed both utilities to file a proposed performance mechanism in a company-specific standalone proceeding by April 15, 2025.

[2] *See,* April 24 order, p. 12.

[3] *See,* Case No. U-20147, filing #U-20147-0124 at p. 143, states: "D. As set forth in the order, the Financial Incentives and Disincentives workgroup shall evaluate potential appropriate metrics for distributed energy resources in the docket for Case No. U-21400. Following the identification and evaluation of appropriate distributed energy resource metrics, these metrics can then be integrated into future distribution investment and maintenance plans."

- DER Aggregation and Non-Wires Alternatives,
- 4.8 kV Conversions, and
- AMI Utilization/Grid Modernization.

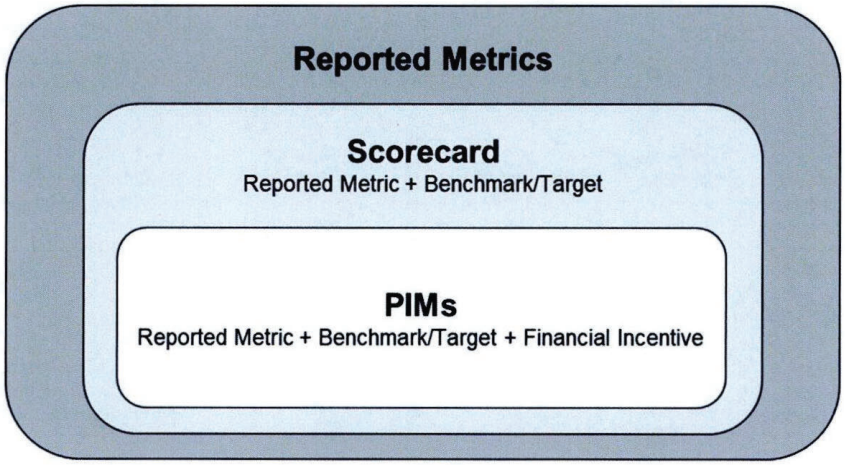
Michigan utilities' most recent distribution system plans described major strategic initiatives and requested significant capital investments over the next 5-10 years to implement these plans. Developing additional metrics and scorecards in this framework can track utility performance towards established goals and complement existing review and approval processes for Michigan utilities' distribution plans and rate cases. Where appropriate, financial incentives and disincentives may be warranted to encourage alternatives to traditional "wires" investments and reward/penalize performance on high priority outcomes.

This discussion paper briefly summarizes the concepts of metrics, scorecards, and performance incentive mechanisms in tracking utility performance. The remaining sections present potential metrics and scorecards in each focus area and possible future incentive/disincentive mechanisms for the workgroup to consider as discussion items.

Overview of Performance Mechanisms

Figure 1 depicts the hierarchical relationship between three levels of performance mechanisms, which are discussed further below.

Figure 1: Three Levels of Performance Mechanisms[4]



Level 1: Reported Metrics - These are measures of performance on an outcome that are publicly reported. For example, the MPSC has been requiring utilities to report metrics on reliability, such as SAIDI and SAIFI, and posting these publicly on the Commission's website. Reported metrics are the most

[4] *See*, Hawaii Public Utilities Commission "Phase 1 PBR Order" at p. 38; Order No. 36326 issued in Docket No. 2018-0088 on May 23, 2019.

basic performance mechanism and have no performance targets or incentive/penalties associated with them.

Level 2: Scorecards - A scorecard combines a reported metric with a specific benchmark or target for performance by the utility. These can be useful in tracking performance on an outcome over time and building experience prior to setting a financial reward or penalty for performance on an outcome.

Level 3: Performance Incentive Mechanisms ("PIMs") – PIMs combine a financial reward and/or penalty for performance relative to the benchmark or target. PIMs may be appropriate to reward achievement of the proposed target or penalizing underperformance.

The remaining sections of this paper review several discussion items for each focus area. The discussion items offer potential reporting metrics, scorecards, and PIMs for review by the FID workgroup. After reviewing feedback from the FID workgroup, the MPSC will consider potential additions to the reliability performance metrics in finalizing the Reliability-Plus Framework.

1) DER Interconnection

The Michigan PSC and electric utilities have devoted considerable time to developing new interconnection rules and procedures, which have been an important activity under the MI Power Grid Initiative. Since these are new processes that utilities will need to implement, this discussion paper initially suggests measuring timelines for interconnection of new DER (DG systems and energy storage) and discussing target performance for this metric with interested parties in the FID workgroup.[5] After collecting data on utility performance under the new interconnection rules for an initial period, The MPSC could consider developing a performance incentive mechanism for DER interconnection timelines, particularly for smaller-scale projects in Levels 1 and 2 under the new rules (DG systems ≤150 kWac).

As an emerging topic in several states, utilities and Commissions are establishing flexible interconnection procedures to allow customers to interconnect to the grid while waiting for distribution system upgrades. In addition, some states and utilities that are meeting significant load growth using flexible interconnection for new loads. This approach reduces potential delays and customer frustration with access to the distribution system. Two discussion items in this section offer potential metrics to track interconnection delays where flexible interconnection may be a useful near-term solution to improving customer experience with interconnecting DERs.

DER Interconnection Discussion Items for FID Workgroup

Discussion Item #1.1 – Develop a DER Interconnection Scorecard

To track DER interconnection timelines for all utilities and encourage progress while implementing new rules:

- Utilities would measure and report annual average DER interconnection timeline for steps under utility control;

[5] Currently, Michigan utilities report information on capacity of DER installed in Annual Distributed Generation Program reports filed in U-20890, but interconnection timelines are not measured or reported.

- FID workgroup could discuss and establish an interim target for DER interconnection timelines (by utility with a focus on Level 1 and 2 projects); and
- Scorecard would publicly report each utility's performance relative to the target (no penalty or incentive).

For reference points in establishing the target performance, the MPSC can consider feedback from interested parties through this process, comparisons to other states that have established (or considering) DER Interconnection timelines, and recent DOE guidance.[6]

Figure 2 - Department of Energy 2030 Target Value for DER Interconnection

Table ES 1. 2030 Roadmap Targets

	Target	System Size*	2030 Target Value
Timing	(1) Median time from DER interconnection request to agreement[5]	< 50 kW	Within 1 day[7]
		50 kW–5 MW	< 75 days
		≥ 5 MW	< 140 days

The figure above from DOE report shows proposed interconnection targets for 2030 by project size. For projects in Level 1 and Level 2 projects as large as 50 kW, the 2030 DOE targets median approval time of interconnection requests to within 1 day.

Discussion Item #1.2 – Track costs and timelines of Interconnection Studies

To facilitate transparency on this important step in the interconnection process, this discussion item proposes to track the costs and timelines for interconnection studies. The information would be reported to the MPSC for reviewing this step of the overall interconnection process. As an example, the Hawaii Public Utilities Commission directed similar monthly reports on the following information:[7]

- Total number of interconnection requests
- Number of interconnection requests for which an Interconnection Requirements Study (IRS) is required
- Date each IRS was initiated
- Maximum kW electrical output of the applicable generating system
- Distribution substation and circuit serving each project
- Proposed in-service date
- Length of time an IRS has been pending
- Explanations as to circumstances causing any delays in performing the IRS

[6] *See,* US Department of Energy Distributed Energy Resource Interconnection Roadmap: Transforming Interconnection by 2035, Interconnection Innovation e-Xchange (i2x), January 16, 2025, online at https://www.energy.gov/sites/default/files/2025-01/i2X%20DER%20Interconnection%20Roadmap.pdf.

[7] *See*, Order No. 32052 in HPUC Docket No. 2011-0206. This information on interconnection studies is now consolidated into monthly reports tracking all active interconnection requests in Hawaiian Electric's service territories. See 2/28/2025 Letter filed by Hawaiian Electric in Docket 2011-0206, "IRS Monthly Report" – Attachment "Monthly Report 01-2025 Consolidated.xlsx" for an example of monthly reporting on interconnection process and IRS status.

The discussion item proposes to only track and publicly report costs and timelines for interconnection studies. The overall DER interconnection timelines reviewed in discussion items 1.1 and 1.3 would include the time required for interconnection studies as these are steps under utility control.

Discussion Item #1.3 – Plan for Future DER Interconnection Performance Incentive Mechanism

After tracking performance over the initial period, a future performance incentive mechanism could be developed for this outcome. Several states have introduced or are considering PIMs for DER Interconnection to improve interconnection timelines as more customers install these systems. The FID workgroup can discuss further details and timelines to establish this PIM.[8] Some suggested steps are listed below:

- Review utility performance under the new interconnection rules and procedures;
- Compare utility performance to targets and between utilities in Michigan and other states;
- Consider symmetric vs. asymmetric incentive/penalty structure;[9]
- Updates to penalty threshold can be informed by recent performance under revised rules (e.g., setting the penalty threshold to prevent backsliding); and
- Incentive threshold needs to balance exceptional performance with costs to improve processes.

Discussion Item #1.4 – Develop Reporting Metrics on Flexible Interconnection

Flexible interconnection is an emerging practice where customers are allowed to interconnect to the distribution system while waiting for a system upgrade.[10] Under this approach, the DER is programmed to curtail output before exceeding a capacity or voltage threshold.[11] In Michigan, DER levels may not yet be high enough to exceed hosting capacity levels broadly across utility distribution systems. However, the allocation of costs for any needed upgrades has been an issue in recent and ongoing electric rate cases and reporting metrics on customer delays from system upgrades and areas of the distribution system with declining hosting capacity can provide insight on when flexible interconnection processes may be useful.

Potential reporting metrics for Flexible Interconnection:

- Number of DG customers requiring system upgrades;
- Mean timeline for system upgrade (days); and

[8] For an example of annual reporting on interconnection performance, see Filing No. F-320670 in HPUC Case No. 2023-04666 – "2024 Interconnection Approval PIM datafile.xlsx"

[9] For this "emergent" outcome, some states have used an asymmetric mechanism with higher weight on the incentive. (HI in MYRP 1, CT staff proposal recommends asymmetric mechanism)

[10] For further information on flexible interconnection, see Department of Energy, *Flexible DER & EV Connections*. Online at https://www.energy.gov/sites/default/files/2024-08/Flexible%20DER%20%20EV%20Connections%20July%202024.pdf#:~:text=This%20whitepaper%20introduces%20and%20elaborates%20on%20three%20key,presenting%20emerging%20flexible%20connection%20strategies%20and%20case%20examples.

[11] As flexible interconnection is still an emerging practice in the US, there are no set standards on long-term management of the DER. In some cases, the programmed limits can be removed after a system upgrade is complete. If the customer prefers the limitation over the cost of an upgrade or can avoid the need, the limitations may remain on the DER system. Some jurisdictions are looking at more advanced practices where the DER limits are adjusted periodically or in real-time based on system hosting capacity.

- Number of feeders exceeding specified DG hosting capacity thresholds (50%, 75%, and 90%).

Discussion Item #1.5 – Develop proactive reporting metrics for new load energization timelines

Michigan utilities, like many across the United States, are facing significant new demands on the distribution system for vehicle electrification and building electrification, among other drivers. These recent increases in load growth have exceeded historical trends, and some utility distribution systems require increased capacity to meet new demand but project long timelines to complete these upgrades. To (continue) meeting customer expectations in supporting growing demand, this discussion item offers proactive reporting metrics to track and report information on new customer requests and timelines for installing system upgrades when needed.

Potential metrics for tracking:

- New customer requests (separate by large customers/EVs)
- Number of new customer requests requiring system upgrades
- Mean timelines for installing upgrades

Table 1: FID Workgroup Discussion Items for DER Interconnection Focus Area

Reliability+ Focus Area	PIM	Scorecard	Metrics
DER Interconnection	N/A for initial period Future DER Interconnection PIM (Level 1 and 2 projects ≤150 kWac)	DER Interconnection Scorecard	Flexible Interconnection metrics New load energization timeline metric Report on Interconnection study costs and timelines

DER Interconnection Discussion Questions for FID Workgroup

Discussion Item #1.1 – Develop a DER Interconnection Scorecard

- What is required for utilities to measure and report interconnection timelines?
- What is a reasonable near-term target for interconnection timelines for steps under utility control?

Discussion Item #1.2 – Track costs and timelines of Interconnection Studies

- What is required for utilities to report costs and timelines of interconnection studies?
- Should the MPSC focus this reporting requirement on certain size DER projects?
    - If yes, which size projects?

Discussion Item #1.3 – Plan for Future DER Interconnection Performance Incentive Mechanism

- Please provide feedback on the following topics related to interconnection timeline performance:
    - What is an appropriate period to collect information to develop a baseline of performance?
    - Should an interconnection timeline PIM be symmetrical or asymmetrical? Provide justification for your recommended approach.
    - What is a reasonable initial incentive/disincentive level for this outcome?
    - Any additional details or suggestions that can help the MPSC in reviewing this discussion item.

Discussion Item #1.4 – Develop Reporting Metrics on Flexible Interconnection

Please provide feedback on the following related to Discussion Item #1.4:

- Comments on the potential reporting metrics
- Recommendations on additional or alternative reporting metrics to identify potential locations where flexible interconnection may improve interconnection timelines and system utilization of DERs

Discussion Item #1.5 – Develop proactive reporting metrics for new load energization timelines

Please provide feedback on the following related to Discussion Item #1.5:

- Comments on the potential reporting metrics
- Recommendations on additional or alternative reporting metrics to identify potential locations where flexible interconnection may improve new load energization timelines

Overall discussion question on DER Interconnection focus area:

- Is DER Interconnection an appropriate area of focus for Phase II of the Reliability-Plus initiative?
- Do the proposed discussion items reflect the most important elements for evaluation in the DER interconnection process?
- What additional metrics, scorecards, or performance incentive mechanisms should the FID workgroup consider under this focus area? Are there any that should be removed from consideration?

2) Customer Data Access and Hosting Capacity

In July 2022, the Michigan PSC convened the Distribution System Data Access workgroup. In the July 7, 2022 order establishing this workgroup (July 7 order), the Commission stated, "As the demand for and deployment of DG systems and EV infrastructure accelerates, there will be an increased need for the collection of distribution system level data, and for the transparency of that data, in order to encourage DG and EV adoption in a way that minimizes costs and enhances efficient utilization of the grid."[12]

The opening order also directed Staff to work with researchers from the National Renewable Energy Laboratory to conduct meetings with interested parties to better understand data needs of EV

[12] *See*, Opening Order in Docket U-21251 issued on July 7, 2022, at p.5.

customers and those with DG installations.[13] After conducting these meetings, MPSC Staff published the Grid Integration Study on June 30, 2023, and recommended further actions in the following areas:

#1 – Data Availability and Improving Map Capabilities
#2 – Revising Capacity Map Visualizations and Vocabulary
#3 – Minimum Level of Electric Service
#4 – Automate Hosting Capacity Analysis Toolkit
#5 – Hosting Capacity Tools for Load and Distributed Generation
#6 – Develop Successor DG and DCFC Tariffs

A review of electric utility hosting capacity analysis maps shows that the maps still have significant limitations and may not meet the above objectives to facilitate efficient DG and EV adoption. The utilities' maps lack up-to-date information on available hosting capacity and only cover limited portions of their distribution systems. The discussion items below list possible reporting metrics for the FID workgroup to review and recommend how utilities can improve the data available to customers through these tools.

Customer Data Access and Hosting Capacity Discussion Items for FID Workgroup

Discussion Item #2.1 – Hosting Capacity Analysis reporting metrics

As a follow up to the recommendations in the Grid Integration Study, the FID workgroup can consider additional reporting metrics for utilities to publicly report areas that utilities can improve in these online customer tools.

Potential reporting metrics:

- Frequency of updates to hosting capacity maps (most recent update on DTE 5/2023, Consumers 4/2024; however, some analyses are older)
- Percentage of service territory (by customers served and/or line miles) covered by the hosting capacity maps
- Granularity of hosting capacity
- Provision of generation and load hosting capacity information

Discussion Item #2.2 – Data Access metrics

Michigan utilities make advanced metering infrastructure (AMI) data available to customers through web portals. The MPSC can further monitor the availability and customer use of these applications.

Potential reporting metrics:

- Metrics on usage of web portals (DTE Insight, Consumers Energy Dashboard)
- Is Green Button Download My Data data access enabled? If yes, number and percentage of customers utilizing this functionality

[13] *Ibid* p.8.

Table 2: FID Workgroup Discussion Items for Customer Data Access and Hosting Capacity Focus Area

Reliability+ Focus Area	PIM	Scorecard	Metrics
Customer Data Access and Hosting Capacity	N/A for initial period	N/A	Hosting capacity metrics Data access metrics

Customer Data Access and Hosting Capacity Discussion Questions for FID Workgroup

Discussion Item #2.1 – Hosting Capacity Analysis reporting metrics

Please provide feedback on the following related to Discussion Item #2.1:

- Comments on the potential reporting metrics
- Recommendations on additional or alternative reporting metrics to improve hosting capacity analysis provided to utility customers

Discussion Item #2.2 – Data Access metrics

Please provide feedback on the following related to Discussion Item #2.2:

- Comments on the potential reporting metrics
- Recommendations on additional or alternative reporting metrics to improve data access provided to utility customers, including utility system data

Overall discussion question on Data Access and Hosting Capacity focus area:

- Are Customer Data Access and Hosting Capacity appropriate areas of focus for Phase II of the Reliability-Plus initiative?
- Do the proposed discussion items reflect the most important elements for evaluation relating to customer data access and hosting capacity?
- What additional metrics, scorecards, or performance incentive mechanisms should the FID workgroup consider under this focus area? Are there any that should be removed from consideration?

3) DER Aggregation and Non-Wires Alternatives

This focus area considers opportunities for DER aggregation to reduce and help manage system peak demand. At the distribution level, targeted aggregations of DERs may help defer/offset new distribution-level capacity investments. Michigan utilities have identified capacity growth at both levels of the grid based on new economic development opportunities, including data centers, onshoring of automotive and other manufacturing, and other sources, as well as increasing customer demand from electrification. The discussion items identify potential metrics, scorecards, and performance incentive mechanisms for capacity services from DERs for review and feedback by the FID workgroup.

DER Aggregation

Michigan utilities have highlighted new economic development opportunities that could increase system peak demand significantly over the next 5-10 years.[14] Meeting this new demand largely with supply-side resources exposes customers to risks from delays in these projects. New loads may not meet their desired timelines for interconnection if utility-scale projects are delayed. Similarly, existing customers may face higher resource adequacy risks if new energy supplies are delayed.

Balancing the portfolio of supply-side resources with aggregated capacity from demand-side resources can improve certainty in the timelines to interconnect new large customers and reduce risks to resource adequacy from potential delays in utility-scale resources. The discussion items on this topic propose a stepwise approach to tracking the systemwide capacity potential of aggregated DERs to a future performance incentive mechanism for integrating cost-effective DER capacity to meet growing system demand.

Non-Wires Alternatives

The MPSC has previously defined non-wires alternatives as "[a]n electricity grid investment or project that uses distribution solutions such as [DER], energy waste reduction (EWR), demand response (DR), and grid software and controls, to defer or replace the need for distribution system upgrades."[15] Michigan utilities have a successful track record of building EWR and DR programs, and have recently included these resources in pilot non-wire alternative (NWA) projects. With the growth of additional DERs, such as managed EV charging, solar with energy storage, and microgrids, Michigan utilities will have increasing opportunities to use DERs as non-wires alternatives.

DTE recently proposed several NWA pilot projects that utilize a range of DERs. After review of these projects in DTE's rate case, the Commission stated, "DTE Electric should continue to focus on the company's current NWA pilots to obtain results that will better inform the company on how to scale its current NWA pilots and better identify opportunities that are suitable for NWAs with relevant findings incorporated into the company's DGP."[16] To prepare for future NWA projects that incorporate a wider range of DERs, including customer-sited DERs, the FID workgroup can consider potential reporting metrics and scorecards that track progress of these resources and could lead to future performance incentive mechanisms for implementing non-wires alternatives more broadly. While this workgroup considers potential performance mechanisms for NWAs, developing the overall framework for using these resources also requires further discussion on criteria for suitability of NWAs as a deferral option and cost-effectiveness of this alternative. The discussion items below offer further ideas for review by the workgroup.

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[14] *See*, DTE Q4 2024 Earnings Conference Call presentation from February 13, 2025, at p.7. DTE is engaged in discussions for over 2.1 GW of potential new load. Online at https://s24.q4cdn.com/970999156/files/doc_financials/2024/q4/Q4-24-presentation-final.pdf. Also, see CMS Energy Year-End 2024 Earnings Call presentation from February 6, 2025 at p. 7. Online at https://s26.q4cdn.com/888045447/files/doc_financials/2024/q4/CMS-Energy-Year-End-2024-Results-Outlook.pdf.

[15] *See,* August 20, 2020 order in Case No. U-20147, p. 11.

[16] January 23, 2025 order in Case No. U-21534, p. 158-159.

DER Aggregation and Non-Wires Alternatives Discussion Items for FID Workgroup

Discussion Item #3.1 – Develop DER Capacity Scorecard

This discussion item describes a sequential process to develop a scorecard for DERs that can provide system-level capacity that benefits all customers. Michigan utilities are already utilizing EWR and DR to provide capacity benefits. This metric would first measure the potential for DERs to provide system-level capacity grid services from all DERs and then discuss targets by utility.

- Step #1 – Report system-level peak capacity potential from EWR, DR plus DER technologies,[17] including solar plus storage, managed EV charging, and new microgrid projects

- Step #2 – Develop aggregate capacity targets based on reported cost-effective potential by technology (EE, DR, PV, Storage, and new controllable loads (including managed EV charging))

For Step #2, capacity targets could be informed by upcoming IRPs, with interim targets discussed through this workgroup. Considering that utilities have recently reported significant increases in expected demand based on customers building new facilities in the near- to medium-term, timelines to meet new customer demand are an important consideration in setting targets for new capacity. The MPSC can consider feedback from the workgroup on the best near-term input to set initial capacity targets from aggregated DERs.

Discussion Item #3.2 – Develop future shared savings mechanism for NWA projects

Michigan utilities have not yet developed an NWA framework for customer-sited DERs. Other states have developed performance incentives for these projects based on a shared-saving mechanism where a portion of the project's avoided costs are shared between customers and utilities. The incentive mechanism offsets a utility's financial incentive to prefer a traditional "wires" solution where capital investment is included in rate base. Under the proposed framework, shared savings plus the cost of the NWA investment would be reviewed and evaluated in determining the overall cost-effectiveness of the project. Under this discussion item, the FID workgroup can discuss methods to value avoided costs from NWA projects, mechanisms to communicate locations where DER investment provides highest economic value, and opportunities for near-term pilot projects that could use this approach.

- Discuss shared savings mechanism for NWA projects using customer-sited DERs
- Identify potential pilot projects

Discussion Item #3.3 – Discuss Future DER Capacity PIM

This potential performance incentive mechanism would reward/penalize performance on enrollment targets in system-level capacity grid services programs.

- System-level capacity targets based on avoiding aggregate peaks cost-effectively

[17] Hawaiian Electric currently reports a similar metric for DER Grid Services Capability, which tracks potential MW for DERs to provide capacity services. See https://www.hawaiianelectric.com/about-us/performance-scorecards-and-metrics/distributed-energy-resource-(der)-asset-effectiveness.

- Michigan utilities could earn incentives based on cost-effectively exceeding aggregate targets to reduce system peak demand
- Incentive based on shared savings from avoiding cost of new capacity

Discussion Item #3.4 – Tracking DER Integration Costs

As DER adoption grows, Michigan utilities will need to invest in distribution system infrastructure, incur costs to manage programs, and upgrade IT systems to support these resources. This discussion item would track and publicly report this information to the MPSC to ensure full costs of DERs are considered in design of programs and potential incentive mechanisms.

The list below provides an initial set of items to track under this metric and discuss with the workgroup:

- Distribution system infrastructure investments to increase hosting capacity;
- Incremental costs to utility to administer and manage new programs; and
- Incremental IT costs and justification for new DER management systems.

Table 3: FID Workgroup Discussion Items for DER Aggregation and Non-Wires Alternatives Focus Area

Reliability+ Focus Area	PIM	Scorecard	Metrics
DER Aggregation and Non-Wires Alternatives	Discuss future shared savings mechanism for NWA projects Discuss DER Aggregation Capacity PIM	DER Aggregation Capacity Scorecard	DER Aggregation Capacity Potential Metric DER Integration cost metric

DER Aggregation and Non-Wires Alternatives Discussion Questions for FID Workgroup

Discussion Item #3.1 – Develop DER Capacity Scorecard

This discussion item describes a two-step process to report potential of DERs to provide system-level capacity and establish targets for utilities.

Please provide feedback on the following related to Discussion Item #3.1:

- Considerations in determining capacity potential from DERs to reduce system peak demand
- Appropriate process to establish targets for aggregated DER resources

Discussion Item #3.2 – Develop future shared savings mechanism for NWA projects

This discussion item encourages dialogue on developing a shared savings mechanism for utility NWA projects that utilize customer-sited DERs.

Please provide feedback on the following related to Discussion Item #3.2:

- Suggestions on appropriate NWA framework(s) to evaluate suitability and cost-effectiveness of NWAs
- Mechanisms to communicate locations where DER investment provides highest economic value

- Discuss potential structure of shared savings mechanism for NWA projects using customer-sited DERs
- Identify potential pilot projects

Discussion Item #3.3 – Discuss Future DER Capacity PIM

Please provide feedback on the following related to Discussion Item #3.3:

  - Should a DER Capacity PIM be symmetrical or asymmetrical? Provide justification for your recommended approach.
  - What are appropriate thresholds for performance above/below targets for an incentive or disincentive?
  - What is a reasonable initial incentive/disincentive level for this outcome?
  - Suggestions for determining cost-effectiveness of the DER capacity acquired through utility programs plus PIM
  - Any additional details or suggestions that can help the MPSC in reviewing this discussion item.

Discussion Item #3.4 – Tracking DER Integration Costs

Please provide feedback on the following related to Discussion Item #3.4:

- Comments on the initial set of DER integration cost metrics
- Recommendations on additional or alternative reporting metrics to track DER integration costs

Overall discussion question on DER Aggregation and Non-Wires Alternatives focus area:

- Are DER Aggregation and Non-Wires Alternatives appropriate areas of focus for Phase II of the Reliability-Plus initiative?
- Do the proposed discussion items reflect the most important elements for evaluation relating to DER aggregation and non-wires alternatives?
- What additional metrics, scorecards, or performance incentive mechanisms should the FID workgroup consider under this focus area? Are there any that should be removed from consideration?

4) 4.8kV Distribution System Conversion

Utility programs for conversion of the 4.8kV system provide needed reliability and capacity benefits. However, the recent auditor's report indicates that conversion projects will take longer than proposed and require significant capital investment. For portions of system waiting on upgrades, targeted NWA projects may provide interim benefits where new capacity is needed. Furthermore, flexible interconnection may provide opportunities for customers to install distributed generation or EVs while waiting for system upgrades. As an initial step to determine where these measures may be valuable, the discussion items below propose reporting metrics to determine where the 4.8 kV system may be limiting customer requests for DG and new loads.

4.8kV Distribution System Conversion Discussion Items for FID Workgroup

Discussion Item #4.1 - Tracking of 4.8kV conversion projects

- Annual reporting on current progress with conversion projects vs. planned projects
- Provide a map of planned upgrades and timing of projects – customers would then know when upgrades occur for their residence/business

Discussion Item #4.2 – Understand current limits on hosting capacity and impact on DER/EV interconnection

Hosting capacity to interconnect DERs is more limited on the 4.8 kV system. The metrics below would measure/monitor where hosting capacity may be limited on these portions of the distribution system. Current online maps are too dated to determine if this is a current or looming challenge.

- Report number of 4.8kV feeders where hosting capacity is below 75% (both DG and EV hosting capacity)
- Report number of interconnection requests requiring system upgrades to interconnect DERs (DG or EV systems); length of delays for these requests

Discussion Item #4.3 – Discuss potential DER-based solutions on feeders waiting for upgrades

In areas that have reached hosting capacity limits, the FID workgroup can consider interim options to improve interconnection until conversion projects increase capacity. Options to consider/discuss:

- Using flexible interconnection in locations where the 4.8kV system is limiting/slowing interconnection of DG and new load (EVs)
- Utility invests in a load relief project with customer-sited DERs as alternative to 4.8kV conversion or interim measure if project is planned further into future. This type of NWA solution could be targeted in locations with high scores on MiEJScreen tool.

Table 4: FID Workgroup Discussion Items for 4.8 kV Conversion Focus Area

Reliability+ Focus Area	PIM	Scorecard	Metrics
4.8 kV conversions	Potential incentive mechanism for NWA and flexible interconnection in targeted locations		Track progress of conversion projects compared planned upgrades Identify pending hosting capacity limits on 4.8 kV system Quantify interconnection delays on 4.8kV system

4.8kV Distribution System Conversion Discussion Questions for FID Workgroup

Discussion Item #4.1 - Tracking 4.8kV conversion projects

Please provide feedback on the following related to Discussion Item #4.1:

- Comments on the potential reporting metrics
- Recommendations on additional or alternative reporting metrics to track progress of 4.8kV projects

Discussion Item #4.2 – Understand current limits on hosting capacity and impact on DER/EV interconnection

Please provide feedback on the following related to Discussion Item #4.2:

- Comments on the potential reporting metrics
- Recommendations on additional or alternative reporting metrics to track hosting capacity limitations on the 4.8kV distribution system

Discussion Item #4.3 – Discuss potential DER-based solutions on feeders waiting for upgrades

Please provide feedback on the following related to Discussion Item #4.3:

- Utility operational considerations in implementing flexible interconnection and NWA projects on the 4.8kV distribution system
- Recommendations on additional or alternative options to address hosting capacity constraints on the 4.8kV distribution system

Overall discussion question on 4.8 kV distribution system conversion focus area:

- Are activities related to 4.8 kV distribution system conversion appropriate areas of focus for Phase II of the Reliability-Plus initiative?
- Do the proposed discussion items reflect the most important elements for evaluation relating to the conversion of 4.8 kV distribution systems?
- What additional metrics, scorecards, or performance incentive mechanisms should the FID workgroup consider under this focus area? Are there any that should be removed from consideration?

5) AMI Utilization/Grid Modernization

In approving AMI programs, the MPSC has consistently reiterated the importance of maximizing the value of these significant investments. In Case No. U-21388, DTE and Consumers Energy were directed to file reports that, "include a description of the initial steps taken to develop internal processes to better use available advanced metering infrastructure data to confirm the restoration of individual customer outages and to coordinate with the Commission Staff on ways to use advanced metering infrastructure data for more accurate outage maps with more precise restoration times." Both companies filed their reports in 2024 and described steps they are taking to better utilize their AMI systems to respond to storms and outage response notifications to customers.

In DTE's recent rate case order, the MPSC directed the utility to file further information on progress with storm response notifications. Developing additional targets for these reporting metrics and tracking improvements on outage response and further investments approved in the rate case could be an additional area of focus for Phase II of the Reliability-Plus initiative. The discussion items list below offer ideas for the FID workgroup to consider on this topic.

AMI Utilization/Grid Modernization Discussion Items for FID Workgroup

Discussion Item #5.1 – Develop Outage Response and Notification Scorecard

- Track response metrics for estimated time of power restoration accuracy and timeliness, first estimate accuracy, and outage notification delivery
- Set targets for these metrics

Discussion Item #5.2 – Future Performance Incentive Mechanism for Outage Response and Notification

After developing further experience with utility performance against a target, the MPSC can consider a future performance incentive mechanism for this outcome. This has been a high priority outcome for improvement and maximizing AMI investments and warrants further discussion by the workgroup.

Discussion Item #5.3 – Implementation of Time-of-Day and Specialty rates

DTE and Consumers provide a range of time-of-day and specialty rates that utilize AMI infrastructure. This discussion item would begin with reporting on customer adoption under the different rates and programs currently available to customers. After reviewing current participation levels, the FID workgroup can discuss if a performance incentive mechanism could encourage higher adoption of rates that lower peak demand or improve system load factor.

Table 5: FID Workgroup Discussion Items for AMI Utilization/Grid Modernization Focus Area

Reliability+ Focus Area	PIM	Scorecard	Metrics
AMI Utilization/Grid Modernization	Future Outage response and notification PIM PIM/Shared savings of pricing programs that reduce peak demand/improve system load factor	Outage response and notification Scorecard	Metrics on customer adoption of time-of-day and specialty rates

AMI Utilization/Grid Modernization Discussion Questions for FID Workgroup

Discussion Item #5.1 – Develop Outage Response and Notification Scorecard

Please provide feedback on the following related to Discussion Item #5.1:

- Comments on the potential reporting metrics - estimated time of power restoration accuracy and timeliness, first estimate accuracy, and outage notification delivery

- What are reasonable near-term targets for these metrics?

Discussion Item #5.2 – Future Performance Incentive Mechanism for Outage Response and Notification

Please provide feedback on the following related to Discussion Item #5.2:

  - Should an Outage Response and Notification PIM be symmetrical or asymmetrical? Provide justification for your recommended approach.
  - What are appropriate thresholds for performance above/below targets for an incentive or disincentive?
  - What is a reasonable initial incentive/disincentive level for this outcome?
  - Any additional details or suggestions that can help the MPSC in reviewing this discussion item

Discussion Item #5.3 – Implementation of Time-of-Day and Specialty rates

Please provide feedback on the following related to Discussion Item #5.3:

  - What additional reporting metrics should the MPSC track to measure implementation of time-of-day and specialty rates with utility AMI systems?
  - Should the MPSC consider performance targets for these rates and programs implemented with AMI systems?
  - Should the MPSC consider a shared savings mechanism or performance incentive mechanism to improve adoption of rates that can lower peak demand or improve system load factor?

Overall discussion question on AMI Utilization/Grid Modernization focus area:

- Are AMI utilization and grid modernization appropriate areas of focus for Phase II of the Reliability-Plus initiative?
- Do the proposed discussion items reflect the most important elements for evaluation relating to AMI utilization and grid modernization?
- What additional metrics, scorecards, or performance incentive mechanisms should the FID workgroup consider under this focus area? Are there any that should be removed from consideration?

Conclusion and Next Steps

This paper presents a set of discussion items and questions for review and comment by the FID workgroup on remaining focus areas for Phase II of the Reliability-Plus Framework. Attachment One summarizes the discussion items.

The MPSC will provide further guidance to the FID workgroup on timelines for responses to this discussion paper and remaining procedural steps in the proceeding.

Attachment One – Summary Table of Discussion Items

Reliability+ Focus Area	PIM	Scorecard	Metrics
DER Interconnection	N/A for initial period Future DER Interconnection PIM (Projects < 150 kWac)	DER Interconnection Scorecard	Flexible Interconnection metrics New load energization timeline metric Report on Interconnection study costs and timelines
Customer Data Access and Hosting Capacity	N/A for initial period	N/A	Hosting capacity metrics Data access metrics
DER Aggregation and Non-Wires Alternatives	Discuss future shared savings mechanism for NWA projects Discuss future DER Aggregation Capacity PIM	DER Aggregation Capacity Scorecard	DER Aggregation Capacity Potential Metric DER Integration cost metric
4.8 kV conversions	Potential incentive mechanism for NWA and flexible interconnection in targeted locations		Track progress of conversion projects compared planned upgrades Identify pending hosting capacity limits on 4.8 kV system. Quantify interconnection delays on 4.8kV system
AMI Utilization/Grid Modernization	Future Outage response and notification PIM PIM/Shared savings of pricing programs that reduce peak demand/improve system load factor	Outage Response Scorecard	Metrics on customer adoption of time-of-day and specialty rates

P R O O F O F S E R V I C E

STATE OF MICHIGAN)

Case No. U-21400

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on March 13, 2025 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 13th day of March 2025.

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

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