

STATE OF MICHIGAN  
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter of the request for a declaratory ruling ) by <b>FORD MOTOR COMPANY</b> regarding home ) backup power and Michigan’s interconnection rules. ) <hr style="width:100%; border: 0.5px solid black;"/>	Case No. U-21619
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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

**DECLARATORY RULING**

On September 13, 2024, Ford Motor Company (Ford) filed a request, along with testimony and exhibits, for the Commission to issue a declaratory ruling pursuant to Mich Admin Code, R 792.10448 (Rule 448) finding that Ford’s electric vehicle systems with the home backup power (HBP) feature do not require interconnection authorization under the Interconnection and Distributed Generation Standards (also known as the MIXDG rules), Mich Admin Code, R 460.901a *et seq.*, because the HBP feature prevents such systems from operating in parallel with the electric utility. Ford’s request, p. 1.

In its request, Ford states that the MIXDG rules govern the processes undertaken by electric utilities to allow parallel operation with the distribution grid when installing a device capable of exporting active power to the grid. *Id.*, p. 3; *see also*, Mich Admin Code, R 460.901a(qq) and (r) (Rule 1a(qq) and (rr)). Ford continues that, under the MIXDG rules, the owner of a distributed

energy resource (DER) must obtain written authorization approving interconnection from the appropriate electric utility before beginning operation of the DER in parallel with the electric utility's distribution system. Ford's request p. 3; *see also*, Mich Admin Code, R 460.968 (Rule 68).

According to Ford, the Ford HBP feature (identified as the HBP System) is a technology that allows the Ford F-150 Lightning electric vehicle (the only vehicle for which the HBP feature is currently available) to provide 30 kilowatt-hours per day of energy when a home is properly equipped and there is no power supplied to the home from the electric grid. Ford's request, p. 3. Additionally, Ford maintains that the HBP System is fully disconnected and isolated from the grid before any power is sent into the home. *Id.*, p. 5. Thus, Ford requests a ruling that since the HBP System can never operate in parallel with the utility's distribution system and, MIXDG rules requiring interconnection authorization from the electric utility therefore do not apply. *Id.*, p. 16.

### Discussion

A request to the Commission for a declaratory ruling is governed by Rule 448, which provides:

- (1) Any person may request a declaratory ruling as to the applicability to an actual state of facts of a statute administered by the commission or of a rule or order of the commission, pursuant to the provisions of sections 33 and 63 of the act, MCL 24.201, MCL 24.328. A request for a declaratory ruling shall contain, or by attached exhibits show, all of the following:
  - (a) A complete, accurate, and concise statement of the facts or situation upon which the request is based.
  - (b) A concise statement of the issues presented.
  - (c) Specific reference to all statutes, rules, and orders to which the request relates.
  - (d) An analysis by the person's legal counsel of the issues presented and a proposed conclusion, or the person's analysis of the issues presented and a proposed conclusion.
- (2) The commission may require that notice of the request for declaratory ruling be provided and may require a contested case proceeding instead of issuing a declaratory ruling.

(3) The decision to issue a declaratory ruling is within the discretion of the commission.

As Rule 448(3) indicates, whether to issue a declaratory ruling, to decline to issue such a ruling, or to order a contested case are decisions within the discretion of the Commission. *See*, July 7, 2023 order in Case No. U-21414, p. 4. The usefulness of a declaratory ruling is limited by the fact that the ruling is binding only on the party requesting it and the agency issuing it. MCL 24.263.

Pursuant to Rule 448, Ford requests that the Commission declare the provisions of the MIXDG rules, which require DER owners to obtain written authorization approving interconnection from the appropriate electric utility before beginning operation of the DER in parallel with the electric utility's distribution system, do not apply to Ford's HBP Systems because the systems do not operate in parallel with the electric utility. Ford's request, p. 1.

Under the MIXDG rules a "DER" means "a source of electric power and its associated facilities that is connected to a distribution system." Rule 1a(r). Also under the rules, "parallel operation" means "the operation, for longer than 100 milliseconds, of a DER while connected to the energized distribution system." Mich Admin Code, R 460.901b(w). Further, per Rule 68(3), an applicant "shall not operate its DER in parallel with the electric utility's distribution system without prior written authorization to operate from the electric utility."

The Commission has reviewed Ford's request, along with the submitted testimony and exhibits, and is satisfied that the HBP System in question will not operate in parallel with an electric utility's energized distribution system and is not capable of exporting active power to the distribution system. The Commission further finds that Ford's request meets the requirements for a declaratory ruling under Rule 448. The Commission finds that Ford's HBP System, as described in its request, will not operate in parallel with the electric utility's distribution system, cannot export active power to the distribution system, and as such does not require written authorization

from an electric utility prior to operation. The Commission further finds that the declaratory relief provided by this order only pertains to Ford's HBP System as described in its request in this docket.

THEREFORE, IT IS ORDERED that:

A. Ford Motor Company's request for a declaratory ruling under Mich Admin Code, R 792.10448 is granted.

B. Ford Motor Company's home backup power systems, as described in the company's request, do not require interconnection authorization from an electric utility under the Interconnection and Distributed Generation Standards, Mich Admin Code, R 460.901a *et seq.*

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 March 13, 2025.

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Lisa Felice, Executive Secretary

# PROOF OF SERVICE

STATE OF MICHIGAN )

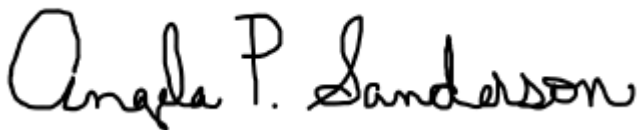
Case No. U-21619

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 13<sup>th</sup> day of March 2025.



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

**Service List for Case: U-21619**

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<b>Name</b>	<b>On Behalf Of</b>	<b>Email Address</b>
Ford Motor Company	Ford Motor Company	valerie@rivenoaklaw.com
Valerie J.M. Brader	Ford Motor Company	valerie@rivenoaklaw.com