

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter, on the Commission’s own motion,)	
to investigate, audit, and review methods employed by))	
DTE ELECTRIC COMPANY and)	Case No. U-21305
CONSUMERS ENERGY COMPANY)	
to secure good electric service and the safety of the)	
public pursuant to MCL 460.555 and MCL 460.556.)	
_____)	

At the June 12, 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

I. HISTORY OF PROCEEDINGS

On October 5, 2022, in the furtherance of a number of previous orders inquiring into and addressing the issues of outage credits, planning and reporting around system reliability and distribution performance, emergency preparedness relating to the length and frequency of power outages, wire down response, and other service reliability and safety issues,¹ the Commission²

¹ In relevant part, previous orders include: December 4, 2014 order in Case No. U-17452 (December 4 order); August 23, 2017 order in Case No. U-18346 (August 23 order); January 18, 2019 order in Case No. U-20169 (January 18 order); May 17, 2018 order in Case No. U-20169 (May 17 order); August 25, 2021 order in Case Nos. U-21122 *et al.* (August 25 order); and March 3, 2022 order in Case Nos. U-21122 *et al.* (March 3 order).

² In their statements and comments, the utilities and commenting persons may refer to the Commission as the MPSC.

issued an order in the instant docket (October 5 order) directing that Consumers Energy Company (Consumers) and DTE Electric Company (DTE Electric) file:

an update on current compliance with each directive and commitment in the December 4, August 23, January 18 (DTE Electric only), August 25, and March 3 orders Consumers and DTE Electric are also directed to report on current compliance with each of the regulations listed by the Commission in the May 17 order, that is, [Mich Admin Code] R 460.3801, 460.3501, 460.3504, 460.721, 460.3502, and 460.813.

October 5 order, p. 12.

Also in the October 5 order, the Commission directed the Commission Staff (Staff) to retain an independent consultant to perform an “audit and review of the distribution systems, including all equipment and operations, of Consumers and DTE Electric.” *Id.*, p. 14. The Commission explained that the audit review should be comprehensive and include recommendations for actions needed to reduce outages, both in number and duration, as well as identify necessary improvements with respect to safety concerns. *See, id.*, pp. 14-15.

The Commission directed that the audit include two parts. Part One was to contain a detailed account of existing installed infrastructure as compared to company records and a comparison to similarly situated companies in similar climates. *Id.*, pp. 15-16. Part Two was to “consist of an audit of each utility’s programs and processes to determine whether the existing programs and processes for emergency preparedness, storm restoration, distribution system maintenance, and investment are sufficient and equitable, and whether they properly plan for climate change and changing load profiles.” *Id.*, p. 16.

On December 21, 2023, an audit status report was filed in the instant docket. *See*, Case No. U-21305, filing #21305-0009. On September 23, 2024, Part One and Part Two audit reports on DTE Electric and Consumers were filed in the instant docket. *See*, Case No. U-21305, filings #U-21305-0010, -0011, -0012, and -0013.

On September 26, 2024, the Commission issued an order in the instant case (September 26 order) directing DTE Electric and Consumers to respond to the completed audits and inviting comments and reply comments from interested persons. As such, on November 15, 2024, DTE Electric and Consumers filed their respective responses to the audit. The following entities filed comments and/or reply comments: the Michigan Department of Attorney General (Attorney General); the City of Ann Arbor (Ann Arbor); the Michigan Environmental Council, the Natural Resources Defense Council, Sierra Club, and the Citizens Utility Board of Michigan (collectively, MNSC); the Staff; the Ecology Center, the Environmental Law & Policy Center, the Union of Concerned Scientists, and Vote Solar (collectively, the Clean Energy Organizations or CEOs);³ DTE Electric; Consumers; Great Lakes Renewable Energy Association (GLREA); Overstory; and John Budd.

As always, the Commission expresses its appreciation for the robust discussion through comments filed in this docket. Given the vast array of information, recommendations, and comments contained in this docket, the Commission will issue separate orders pertaining to DTE Electric and Consumers. The instant order will address the Consumers audit, Consumers' response to the audit, and related comments.⁴

II. DISCUSSION

In Part One of its September 23, 2024 Final Report, Utility Distribution Audit of Consumers Energy (Consumers Part One Report), presented by The Liberty Consulting Group (Liberty) to the

³ The CEOs filed reply comments to DTE Electric and Consumers separately. Therefore, the CEOs' reply comments pertaining to Consumers are referenced as CEOs' Consumers comments. *See*, filing #U-21305-0024.

⁴ The Commission notes that all audit findings, recommendations, and interested person comments may not be specifically cited or addressed in the body of this order. However, the record has been thoroughly reviewed and considered by the Commission.

Commission, Liberty described its findings in the following areas: the electric grid system, construction standards and inspection and maintenance practices, stratified facilities sampling, field and stores inventory, system comparisons, and reliability comparisons. *See*, Consumers Part One Report, pp. *i-iii*. Liberty reports that Part One addresses its:

- Tabulation of electric system asset numbers, miles, configurations and ages to provide an overall depiction of the Consumers electric system
- Examination of asset inspection, maintenance, end of life practices, and application of the National Electrical Safety Code (“NESC”)
- Examination of a statistically relevant sample of Consumers Energy (“Consumers”) distribution system facilities to evaluate asset conditions and accuracy of records
- Examination of methods for ensuring sufficient stock to supply headquarter districts during normal and storm activities
- Comparison of Consumers’ distribution system to similarly situated electric utilities and to the Lansing Board of Water and Light (“LBWL”) in the following areas:
 - o Asset types
 - o Configurations
 - o Ages
- Review of inspection and maintenance practices and cycles
- Analysis of reliability metrics and forestry practices.

Consumers Part One Report, p. 1. Liberty further summarized key points of its Consumers Part One Report findings in the report’s Executive Summary. *Id.*, pp. 1-5.

In Part Two of its September 23, 2024 Final Report, Utility Distribution Audit of Consumers Energy (Consumers Part Two Report), Liberty described its findings, conclusions, and recommendations as a result of the audit. Consumers Part Two Report is divided into the following chapters by topic:

- Chapter I – Distribution System Organization, Management and Processes;
- Chapter II – Electric Distribution Infrastructure Investment Plan (EDIIP)⁵ Reliability Programs;
- Chapter III – Emergency Planning and Response; and

⁵ The EDIIP is also referred to as the Reliability Roadmap and these terms are used interchangeably in this order.

- Chapter IV – Outage Communications

As noted above, Consumers filed its initial response to the audit on November 15, 2024

(Consumers’ initial response). In this response, Consumers noted agreement with several of the audit recommendations and further noted additional plans going forward regarding many of those recommendations. *See*, Consumers’ initial response, pp. 2-4. Consumers also notes that it:

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.

Consumers’ initial response, p. 4, n. 1. Below, the Commission will address recommendations and responses that need further discussion from the Commission at this time and notes that all recommendations made by Liberty in the audit that are not discussed below are adopted by the Commission. As such, in adopting these uncontested recommendations, the Commission expects to see them implemented into the company’s practices and procedures and reflected in future distribution plans and other filings on a going forward basis.

A. Consumers Energy Company

1. Final Report Utility Distribution Audit of Consumers Energy: Part One

Consumers responds to the Consumers Part One Report with respect to several issues. First, Consumers notes that “Liberty acknowledged that Automatic Transfer Recloser (‘ATR’) schemes reduce customer interruptions and incrementally improve SAIDI [System Average Interruption Duration Index] but took the position that these schemes can mask the extent to which tree contact and equipment failures cause outages.” *Id.*, p. 5 (citing Consumers Part One Report, p. 19).

Consumers specifically contends that ATRs do not “mask” outage counts and “whether ATRs

mask outage counts is not as important as the number of customers who do not lose power when ATRs operate.” Consumers’ initial response, p. 5. Thus, the company concludes that its proposed investments in ATRs are reasonable and modest while also providing important customer outage prevention. *Id.*, p. 6.

Next, Consumers noted appreciation for “Liberty’s recognition of the value of installing additional fault sensing devices, additional fuses, and improved system protection relays.” *Id.*; *see also*, Consumers Part One Report, p. 19. In addition, the company indicates that Liberty’s observation regarding upgrading overhead lines is partially true. As such, Consumers clarifies that “[t]o 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 [low voltage distribution] overhead lines consistent with National Electric[al] Safety Code (‘NESC’) requirements.” Consumers’ initial response, p. 6.

Regarding Liberty’s physical inspection of Consumers’ distribution system finding eight poles that merited short-term attention, the company states that it took action to remedy the issues with these eight poles upon learning about the issues. Further, Consumers lists the actions it has taken to remedy the issues. *Id.*, p. 7.

Finally, Consumers states that it “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.” *Id.*, p. 8. The company notes, however, that Liberty generally examined year-over-year SAIDI trends, which Consumers avers “reveals an incomplete picture.” *Id.* (citing Consumers Part One Report, pp. 62, 64, 70, 73, and 76). Consumers opines that Liberty’s examination of historic

SAIDI performance influenced many of Liberty’s recommendations and finding that “the Company’s recent investments in its system have not had a meaningful impact on SAIDI performance.” Consumers’ initial response, pp. 8-9 (citing Consumers Part One Report, p. 71). In sum, Consumers contends that “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.” Consumers’ initial response, p. 11. The company notes that this issue is addressed further with respect to Liberty’s recommendations in Part Two.

2. Final Report Utility Distribution Audit of Consumers Energy: Part Two

a. Chapter I – Recommendation 1

Chapter I, Recommendation 1 states that Consumers should “[e]stablish a focused effort for identifying required resources and for closely monitoring their effectiveness and efficiency.” Consumers Part Two Report, p. 5 (emphasis in original). This recommendation references Conclusion 3, which states that “[c]ontinuing attention to resource levels will remain critical to efficiently performing the very large work levels contemplated by the EDIIP.” *Id.* (emphasis in original).

Consumers responds that it is aware of challenges it may face in implementing its Reliability Roadmap inclusive of hiring and managing resources. Therefore, Consumers states that it “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.” Consumers’ initial response, p. 12. The company disagrees with this implication and cites aspects of the Reliability Roadmap to demonstrate that Consumers “has the necessary programs, processes, and plans in place to meet the intent of this recommendation.” *Id.*, p. 14.

The Commission agrees with this recommendation. It is clear that Consumers does not dispute the need to implement this recommendation, as it has outlined parts of the EDIIP to do such. The Commission finds that it is of utmost importance for Consumers to continue to identify and put in place the resources required and closely monitor their effectiveness and efficiency as the evidence presented by the company in this regard will continue to be an important element in evaluating the reasonableness and prudence of the company's proposed investments. *See*, March 21, 2025 order in Case No. U-21585, pp. 63-64.

b. Chapter I – Recommendation 3

Chapter I, Recommendation 3 states that, “[w]ith completion of the current changes contemplated in asset management measures, [Consumers should] continue to assess the merits of moving to a more empowered organization, led at the director-level, responsible for ensuring optimized execution and continuing development and execution of the program.” Consumers Part Two Report, p. 15 (emphasis in original). This recommendation cites to Conclusion 9, which in part states that “Consumers has underway an initiative that will bring more structure, comprehensiveness, and utility to its asset management program, after which it will become timely to address the structure employed to manage it.” Consumers Part Two Report, p. 15 (emphasis in original).

In its initial response to the audit, Consumers responds that its current “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.” Consumers’ initial response, p. 18. Specifically, the company notes that its existing leadership structure empowers Consumers to achieve the goals of driving “consistency across programs and efficiencies across the various functions impacting distribution asset management”

as recommended by Liberty. *Id.*, p. 15. Consumers notes its agreement “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” and that being in the early stages of enhancing its distribution management strategy, the company is focused “on completing many ongoing improvements in its current plan without introducing significant changes, like a new leadership position, to its plan.” *Id.*, p. 16 (citing Consumers Part Two Report, p. 15).

In its reply comments filed on January 17, 2025 (Consumers’ reply comments), Consumers included a summary of its responses attached as Appendix 1. With respect to Chapter I, Recommendation 3, Consumers reiterates that it disagrees with this compliance-related recommendation, particularly the timing of the recommendation. However, Consumers notes its agreement to “revisit Liberty’s proposal once it completes ongoing initiatives.” Consumers’ reply comments, Appendix 1, p. 2.

The Commission finds that accountability within the management structure of the utility is critically important. The Commission recognizes the company’s work is underway but emphasizes the need for continued work in this area. As noted in the audit report, the “best practice calls for assigning responsibility for ensuring effective application of a sound asset management program to an organization specifically dedicated to that role,” noting that currently “Consumers does not follow this practice, but is developing a unified approach to electric asset management.” Consumers Part Two Report, p. 14. Thus, the Commission encourages the company to continue to work towards implementing this recommendation.

c. Chapter I – Recommendation 4

Chapter I, Recommendation 4 states that Consumers should “[r]einst~~ate~~ **ground-line inspection of LVD poles on a cyclical basis.**” Consumers Part Two Report, p. 30 (emphasis in

original). This recommendation cites to Conclusion 13, which indicates that the “[e]limination of ground-line inspections of LVD poles has reduced the effectiveness of measures used to reject poles on inspection.” *Id.*, p. 29 (emphasis in original).

Consumers states that it does not agree with all of Liberty’s conclusions that support this recommendation. However, the company agrees that “boring, when properly performed, can be a valuable technique to complement the Company’s already robust two-year visual inspection program.” Consumers’ initial response, p. 18. Thus, Consumers notes its support for implementing this recommendation, indicating that it will align its Reliability Roadmap with plans to add boring to its LVD inspection repertoire to strengthen its LVD system.

The Staff comments that it “agrees that more thorough inspection and testing of assets will not only be more cost-effective but will also improve insight into Consumers’ assets and overall condition.” Staff’s initial comments, p. 22. Further, the Staff notes that specific conditions should be considered, not only age.

MNSC also generally comments that Consumers has placed an overreliance on age in evaluating asset health and developing replacement plans. MNSC states that it is pleased to see the company is adopting recommendations relating to pole inspection and replacement but “it remains concerned that the Company still over-relies on age.” MNSC’s initial comments, p. 18.

The Commission agrees with this recommendation and finds that Consumers also agrees to implement this recommendation. Therefore, the Commission will review the updated pole inspection and replacement plans in the company’s upcoming distribution plan filing. *See*, Consumers’ initial response, p. 20.

d. Chapter I – Recommendation 6

Chapter I, Recommendation 6 states that Consumers should “[c]ontinue to increase numbers of employee and contractor field operations and address non-productive time’s contribution to outage durations.” Consumers Part Two Report, p. 38 (emphasis in original). This recommendation references Conclusion 20, which indicates that “[i]t is not clear that field staffing levels are sufficient to support outage response.” *Id.*, p. 35 (emphasis in original).

Consumers responds, noting its agreement with the intent of this recommendation. However, Consumers avers that the recommendation inappropriately implies that the company “does not evaluate resourcing needs in the manner it described” when, in fact, the “current analysis processes and capabilities meet the recommendations’ intent.” Consumers’ initial response, p. 20.

Consumers states that, 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,” and that it “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.” *Id.*, p. 21.

Consumers further states that it constantly evaluates staffing levels and performance of its line crews. Specifically, it states that “[t]hrough 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.” *Id.*, p. 21. Thus, Consumers contends that it already follows “regular and comprehensive processes” that “track, manage, and minimize crew non-productive

time and make staffing level changes as necessary across the Company’s headquarters locations.”
Id., p. 22.

The Commission agrees with Liberty’s recommendation. The Commission notes its appreciation of the company’s agreement with the intent behind this recommendation and acknowledges the planned upgrades to OMS and ADMS, as noted by the company. However, going forward, the Commission wants to see evidence of actual improvement as it relates to non-productive time performance and time dedicated to wire guarding, and the Commission also notes that line workers’ time should be prioritized for restoration efforts, and other resources should be used for guarding downed wires (*see*, Chapter III – Recommendations 7 and 8 on deploying appropriate resources to de-energize and promptly address downed wires in lieu of assigning line worker wire guards).

e. Chapter I – Recommendation 7

Chapter I, Recommendation 7 indicates that Consumers should “[r]eassess the numbers and alignment of ESWs [Electric Service Workers] among the headquarters locations.” Consumers Part Two Report, p. 38 (emphasis in original). This recommendation cites Conclusion 21, which states that “ESW staffing at some headquarters locations is minimal.” *Id.*, p. 35 (emphasis in original).

Consumers responds, noting its agreement with the intent of this recommendation. However, Consumers avers that the recommendation inappropriately implies that the company “does not evaluate resourcing needs in the manner it described” when, in fact, the “current analysis processes and capabilities meet the recommendations’ intent.” Consumers’ initial response, p. 20. Consumers contends that it is “constantly evaluating the staffing level and performance of its ESWs and line crews assigned to headquarter locations.” *Id.*, p. 21. Further, Consumers argues

that this recommendation is too narrowly focused on ESWs because 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.” *Id.*, p. 22. Thus, Consumers contends that it already follows “regular and comprehensive processes” that “track, manage, and minimize crew non-productive time and make staffing level changes as necessary across the Company’s headquarters locations.” *Id.*

The Commission again agrees with Liberty’s recommendation. Reassessment of standards and procedures for staffing levels on a regular basis is beneficial. The Commission appreciates the company’s agreement with the intent behind this recommendation and further finds that Consumers should continue to review processes going forward and make improvements as necessary.

f. Chapter I – Recommendation 8

Chapter I, Recommendation 8 indicates that the company should “[c]onduct a structured analysis and evaluation of re-establishing core HVD construction, maintenance and operations skills, tools, experience within Consumers.” Consumers Part Two Report, p. 38 (emphasis in original). This recommendation references Conclusion 22 which states that “[t]he high level of reliance on contractors for HVD line work creates a low probability but high consequence risk of expertise loss.” *Id.*, p. 37 (emphasis in original).

Consumers responds to this recommendation, explaining that it:

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 [National Electric Contractors Association] 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.

Consumers' initial response, p. 23. The company continues, noting appreciation for Liberty's recommendation, but avers that Consumers' "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." *Id.*, p. 24.

In its initial comments, MNSC states that Consumers has a "tendency to ignore accepted best practice and replace functional assets [such as] its plans to rebuild HVD infrastructure solely on the basis of non-standard configuration." MNSC's initial comments, pp. 19-20. Further, MNSC contends that in the audit report, "Liberty appropriately notes that the value of such rebuilds is dubious and unproven, especially when more proven methods exist to improve reliability (such as line clearance)." *Id.*, p. 20.

The Commission finds that there is value in this recommendation and that there is room for improvement in Consumers' practices for planning and staffing for HVD construction, maintenance, and operation. Therefore, the Commission encourages the company to work toward implementing this recommendation and fully supporting any request for cost recovery in future cases.

g. Chapter II – Recommendation 1

Chapter II, Recommendation 1 indicates that the company should "[r]estate EDIIP reliability and safety program, measure, and activity scopes to optimize scope and expenditures assuming an extended period to reach second quarter SAIDI performance." Consumers Part Two Report, p. 59 (emphasis in original). This recommendation cites to Conclusion 1, which states that "[t]he 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.” *Id.*, p. 58.

In its initial response, Consumers states that while it “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.” Consumers’ initial response, p. 27. Further, Consumers states that its:

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.

Consumers’ initial response, p. 29. The company, therefore, agrees it is prudent to examine a longer timeframe; however, it claims “any deviation from the Company’s current plan should come only after careful consideration of all the risks associated with proposed alternatives.” *Id.*, p. 30. Thus, Consumers requests that the Commission delay making decisions regarding the pace of future investments until after the additional analysis is complete. *Id.*, p. 31.

The Attorney General notes appreciation for Consumers’ willingness to evaluate the extended timeframe and comments that she “looks forward to seeing such a plan that stretches the five-year capital spending over a 10-year period.” Attorney General’s initial comments, p. 13. Further, the

Attorney General states that rather than modifying the company's reliability performance goal, the means in meeting the goal may need to be updated "such as through more vegetation management and better implementation." *Id.*, p. 14.

MNSC also acknowledges Consumers' willingness to "evaluate a longer time horizon but, in the interim, wants to maintain rapidly accelerating spending plans and skyrocketing rates."

MNSC's initial comments, p. 13. MNSC argues that this plan is not reasonable and prudent and that "[r]amping up capital spending at ratepayers' expense should occur only after Consumers has presented sufficient evidence that it is necessary and sufficiently beneficial. Massive increases in capital programs should not be the default to later be adjusted down. Instead, they must be justified up from the existing baseline." *Id.* MNSC contends that Liberty's recommendation to slow spending is supported by reasonable and more cost-effective ways to improve reliability. Overall, MNSC notes support for reprioritizing investments but not delaying goals of improved reliability. *Id.*, p. 14.

In comments, the Staff:

recommends that the Company's analysis of slowing the pace of expenditures from five years to a seven to ten-year timeframe include projected annual reliability and customer rate impacts. Analyzing the rate impacts of the Company's current five-year plan and Liberty's suggested longer time periods will be a key aspect of understanding the full impacts of each timeframe. Customer affordability is one of the key themes discussed in the Commission's September 26, 2024 order in [Case No.] U-20147 which included issuing the Staff's Distribution Plan Straw Proposal for public comment. Staff notes that the straw proposal attached to the order includes a provision for this type of analysis in future distribution plans.

Staff's initial comments, p. 26. The Staff further notes its concerns surrounding Consumers' ability to increase resources to fulfill its plans but "notes that it will examine the Company's processes and plans and the Company's ability to efficiently carry out the increasing workload in

future distribution plans and future rate cases.” *Id.* Overall, the Staff makes three recommendations:

1. Consumers should continue to assess its ability to carry out its planned increases in distribution capital projects and provide this information in future distribution plans.
2. Consumers should compare its actual reliability performance to its reliability impact projections based on forecasted distribution capital program spending. Staff recommends reviewing this metric as part of future rate cases.
3. Consumers should provide a rate impact analysis for meeting its reliability goals in 5, 7, and 10 year timeframes in its next rate case. Staff notes that the distribution plan straw proposal is currently undergoing review in [Case No.] U-20147. The details for providing rate impact information in future distribution plans will be determined in that proceeding.

Id., pp. 27-28.

The CEOs comment that this recommendation presents a challenging trade off. Continuing, the CEOs state that “[w]hile a slower pace might mitigate short-term cost impacts on customers, it risks delaying the realization of the reliability benefits that Consumers has been striving to achieve.” CEOs’ initial comments, p. 4. Further, the CEOs note support that “recent improvements in reliability metrics should inform, but not dictate, future investment timelines.”

Id. Overall, the CEOs note the importance to strike “a balance between long-term planning, execution, and affordability considerations.” *Id.*

In reply comments, Consumers agrees that it will perform an analysis in a future filing but contends that no matter what analysis it does, the system will require capital improvements. More specifically, Consumers states:

[c]apital investments are needed in the distribution system, especially as the system continues to age and degrade, an issue which line clearing cannot address. Line clearing is also critical to reliability, but it is not a standalone solution. Absent capital improvements to counteract and reverse the impacts of system degradation, degradation will lead to more service interruptions for customers. By proactively replacing assets, the Company can address degradation and improve service quality for customers.

Consumers' reply comments, p. 24.

The Commission appreciates the company's commitment to further examine this recommendation by evaluating an extended timeframe for investments. The Commission agrees with the overall goal of reaching the median industry level for SAIDI performance but underscores that achieving that goal must be done in a cost-effective manner. The Commission is not yet convinced that a slower pace in spending in certain areas will result in delayed reliability goals, if the company appropriately considers alternative routes to achieve improved reliability. As noted in the comments, tradeoffs between capital and operations and maintenance (O&M) spending, including tree trimming, must be fully evaluated, and requests for rate recovery must include evidence of the analysis performed which supports the plans proposed by the company. The Commission will continue to evaluate the company's plans going forward, including the evaluation of an extended timeframe from seven to ten years coupled with evidence supporting the appropriate mix of projected capital and O&M spending to meet the goal in a cost-effective manner.

h. Chapter II – Recommendation 2

Chapter II, Recommendation 2 states that Consumers should “[m]ove to a four-to-five-year forestry cycle for LVD circuits overall, completing the first roughly contemporaneously with the 2028 end of the EDIIP period.” Consumers Part Two Report, p. 71 (emphasis in original). This recommendation references Conclusion 2, which states that “[t]he seven-year overall forestry cycle that Consumers has targeted for its LVD circuits is too long to be effective in avoiding interruptions.” *Id.*, p. 68 (emphasis in original).

In its initial response, Consumers avers that this recommendation is an aggressive proposal that would have an impact on customer rates. The company states that it “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.” Consumers’ initial response, pp. 31-32. Consumers notes, however, that line clearing O&M expenses are required to be recovered the year they are incurred, which could result in increases to the revenue requirement and would have a disproportionate effect on residential rates. The company concludes that it:

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.

Id., p. 40.

The Attorney General comments that the company’s willingness to evaluate a shorter tree-trimming cycle is encouraging. With regard to the impact on customer rates, the Attorney General states that the higher O&M versus capital expenditures may have a greater short-term impact on customers but that “some of the impact can be mitigated by a reduction in capital spending by extending most of the capital spending on distribution system upgrades over a 10-year period instead of a 5-year period.” Attorney General’s initial comments, p. 15.

Similarly, MNSC comments that the recommendation to move to “a four- to five-year cycle is sound and comports with utility best practice and real-world results.” MNSC’s initial comments, p. 16. MNSC continues, stating that the company did not present evidence that a seven-year cycle is optimal. Therefore, MNSC recommends that the Commission “strongly consider Consumers’ potential financial motivations when it comes to its attitudes on this topic.” *Id.*

In their initial comments, the CEOs state that Liberty’s analysis of the data regarding tree-trimming cycles calls into question the company’s conclusion that cycles of six to seven years are

most equitable. Given this, the CEOs “recommend that the Commission rule that Consumers must follow Liberty’s recommendation in this case, including a requirement to address the data reliability issues that Liberty noted.” CEOs’ initial comments, p. 7.

Consumers replies that it “continues to evaluate how to balance customer affordability and line clearing expense. As it evaluates its line clearing cycle strategy across its LVD system and maintains a four-year cycle for its HVD system, the Company is considering and values Liberty’s findings and its recommendations.” Consumers’ reply comments, p. 26. The company further states that additional funding may be necessary to acquire additional tools but “[f]or now, the Company will continue evaluating shorter line clearing cycles and any potential cycle reductions will appear in the Company’s next filed Reliability Roadmap and electric rate case.” *Id.*, p. 28.

While the Staff filed initial comments, it notes that, in reviewing this recommendation, the Staff is still evaluating the recommendations and response. As a result, the Staff filed reply comments on this topic. In reply comments, the Staff states that it appreciates Consumers’ research regarding tree trim optimization but disagrees with Consumers’ conclusions. More specifically, the Staff notes disagreement with the company’s focus on residential rate impacts to justify a seven-year line clearing cycle. Continuing, the Staff states that:

[g]enerally, for programs and investments where reasonableness and prudence are determined by a calculation of net benefits, in nearly all cases only the aggregate costs and benefits are considered. By this standard, a four-year cycle appears to be the most prudent option, not a seven-year, because the [company’s Formal Optimization Analysis of Line Clearing Cycles] report itself states that considering costs across all customers leads to a four-year optimal cycle length.

Staff’s reply comments, p. 2. In sum, the Staff recommends that the Commission adopt Liberty’s recommendation to move to a four-to-five-year forestry cycle and opines that “with these changes, customers will see a positive impact on the reliability of their service. For many electric utilities,

line clearing is the most effective program to improve reliability for customers, at least in the short term.” *Id.*, p. 4.

In the March 21, 2025 order in Case No. U-21585 (March 21 order), Consumers’ most recently concluded rate case, the Commission addressed many of the same issues raised here. Specifically, the Commission approved the company’s proposed O&M expense for line clearing noting that “it will allow Consumers to spend the full amount for line clearing to increase the resiliency of its electric distribution system.” March 21 order, p. 292. The Commission nevertheless found “that greater investment in tree trimming will result in reduced outages, along with cost savings for customers.” *Id.* The Commission noted that the record in that case demonstrated the optimal cycle length was a four-year fixed cycle which would maximize customer benefits at the lowest possible cost. The Commission further stated that:

the company’s only purported justification for not embracing this “optimal cycle length” is that it would be inequitable for residential customers to pay a disproportionate amount for the additional costs of shifting to a four-year fixed cycle as the majority of benefits accrue to non-residential customers. Yet the Commission notes that this same reasoning also applies to the company’s current efforts to move to a seven-year effective cycle, as noted by MNSC (*see*, 3 Tr 303-305), and it is unclear why the company would not move forward with at least considering a more aggressive, more optimal tree trim cycle. As such, the Commission expects Consumers to incorporate the results of the analysis underlying its own Optimization Analyses and directs the company to consider the benefits of shifting to a four-year fixed tree trimming cycle in its next electric rate case. At a time when the company is proposing a 44% increase in capital spending in this case to improve reliability, it seems incongruous to keep LVD O&M essentially flat through 2028 even while acknowledging that a four-year fixed tree trimming cycle is optimal. The Commission notes that this directive to consider the benefits of shifting to a four-year tree trim cycle is also consistent with the [Administrative Law Judge’s] recommendation that Consumers provide an analysis of the feasibility of more aggressive line clearing in its next electric rate case.

March 21 order, pp. 292-293. The Commission reiterates this recent decision and expects to see such an analysis, consistent with the March 21 order.

i. Chapter II – Recommendation 4

Chapter II, Recommendation 4 states that the company should “[d]etermine whether considerations other than reliability enhancement warrant the EDIIP expenditures associated with open wire secondary removal.” Consumers Part Two Report, p. 72 (emphasis in original). This recommendation references Conclusion 8, which indicates that “[r]emoval of open wire secondary is not cost beneficial from a reliability improvement perspective; other policy grounds need to be considered in justifying it.” *Id.*, p. 70 (emphasis in original).

Consumers responds that it accepts the invitation and “can confidently say that other considerations do warrant the expenditures.” Consumers’ initial response, p. 42. The company agrees that legacy open wire secondary replacement will not result in significant improvements in SAIDI because “[i]ndividual outages on the secondary system may not affect large numbers of customers” but that “CAIDI [Customer Average Interruption Duration Index], CEMI [Customers Experiencing Multiple Interruptions], and CELID [Customers Experiencing Long Interruption Duration] are negatively impacted by secondary outages.” *Id.* Providing an example, the company states that even with a minimal impact on SAIDI, customers still experience significant frustration with frequent and long power outages. Further, Consumers states that “[r]eplacing 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 [the] multiplex conductor can be repaired quicker.” *Id.*, p. 43.

In conclusion, Consumers states that:

while understanding the SAIDI impact of open wire secondary is not large, [the Company] 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.

Id.

In its initial comments, the Staff reviewed Consumers' response to this recommendation. After its review, the Staff noted its agreement with Consumers' response. Staff's initial comments, p. 34.

The Attorney General comments that she agrees with Liberty's recommendation. Specifically, relying on her expert's testimony in Case No. U-21585, the Attorney General reiterates a recommendation "that the secondary wire replacement program be scaled back to a 20-year replacement timeframe." Attorney General's initial comments, p. 16. She contends that her recommendation and a slower pace of replacement would give customers some relief in rates.

MNSC also comment, again noting that Consumers has a "tendency to ignore accepted best practice and replace functional assets" MNSC's initial comments, pp. 19-20. MNSC indicates that, per the audit report, Consumers' plans to replace open wire secondary programmatically is not a common industry practice. Given this, MNSC recommends that any such plans:

should be reviewed thoroughly in a contested docket before any spending is approved. It is important that the Commission fully understand the cost and benefits of this program and ask itself (and Consumers) if this is the optimal usage of \$100 million to improve EJ [environmental justice], CELID, and CEMI outcomes. It is likely that a more reasonable alternative is to simply replace open wire with multiplex when it fails, as opposed to the programmatic approach the Company is proposing. This tactic also better comports with industry best practice.

Id., p. 21.

The CEOs also comment, noting that Consumers states there are many additional benefits to replacing open wire secondary but avers that the company "provides no quantitative data to

support these benefits aside from two specific examples.” CEOs’ initial comments, p. 8. The CEOs acknowledge that Consumers’ claims may be accurate, but that:

until such benefits can be quantified, Consumers should follow the recommendations of Liberty to shift funding to other programs with clearer and quantified benefits. However, given the concern about how this issue may affect EJ communities specifically, care should be taken to ensure data analysis is sufficiently robust to determine the specific impacts on EJ communities, and any shift in program focus or funding should not be made at the expense of individual communities more directly impacted by reliability of open wire secondary.

Id., p. 9.

Consumers replies to initial comments, clarifying its agreement with Liberty’s stated recommendation and noting that its initial response provided a review of “*additional* benefits of open-wire secondary removal.” Consumers’ reply comments, p. 28 (emphasis in original). In response to the Attorney General, Consumers notes that the Attorney General’s comments seem to support the replacement of open wire secondary, albeit at a slower pace. In addition, the company states that, contrary to the Attorney General’s comments, its plan is not a 10-year plan to replace all open wire secondary. Specifically, Consumers states that its “Reliability Roadmap stated that there are 4,000 miles of open-wire secondary and that 917 miles would be replaced over a 10-year period. Therefore, the true duration of the plan, continuing at the same pace, is 43 years, not 10 years.” *Id.*, p. 29.

The Commission agrees, in part, with Consumers’ response regarding this recommendation. The Commission recognizes the possibility of additional benefits in the replacement of open wire secondary. However, the Commission is not yet convinced that removal of open wire secondary should be based on reliability enhancement alone and believes that continued investments need to be appropriately supported in future rate cases, including the appropriate levels of detail supporting the chosen strategy and reasoning for such strategy. The Commission notes that, in its

Electric Distribution Infrastructure Investment Plan (2024-2028), Consumers reports that the open wire secondary system is “nearing or at the end of its life, which causes the conductor to be brittle and not easily repaired.” *See*, Case No. U-20147, filing #U-20147-0093. As noted by the CEOs, if there are additional benefits and improvements to metrics such as CAIDI, CEMI, and CELID, the company should provide quantitative data supporting such claims. Going forward, Consumers should present evidence demonstrating the benefits of open wire secondary replacement and review the potential tradeoffs with alternatives, including vegetation management, in future distribution plans.

j. Chapter II – Recommendation 5

Chapter II, Recommendation 5 states that Consumers should “[d]elay expansion beyond current pilots for LVD undergrounding, in order to recognize the dependence of that expansion on information and analysis that will take time to evaluate robustly.” Consumers Part Two Report, p. 72 (emphasis in original). This recommendation references Conclusion 12, which indicates that “[t]he limited LVD undergrounding planned will have substantial value in permitting careful analysis of the costs and reliability of benefits of undergrounding, which remain too uncertain at present to support expansion to the potential level the EDIIP includes.” *Id.*, p. 70 (emphasis in original).

In its initial response, Consumers states that its plans for undergrounding should not be delayed in light of the benefits of enhanced resilience. Consumers states that Liberty does not dispute the benefits of undergrounding but “appears to be concerned about a major expansion in the amount of annual expenditures for the program.” Consumers’ initial response, p. 44. Consumers indicates that it “plans to further increase spending twofold, doubling the annual number of LVD line miles being converted from overhead to underground” but “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.” *Id.*, p. 45. Consumers notes that it can make modifications to be filed in its next distribution plan filing in Case No. U-20147.

The Attorney General cites to expert testimony filed in Case No. U-21585, which “pointed out the shortcoming in the company’s undergrounding program, including an erroneous present value cost analysis, the [severely] understated cost per mile for undergrounding, and the lack of a cost/benefit analysis as a key criterion before undertaking each undergrounding project.” Attorney General’s initial comments, p. 17. Moreover, the Attorney General recommends that the Commission direct the company to reexamine its undergrounding program to incorporate a benefit/cost analysis (BCA) taking into consideration more realistic costs per mile. *Id.*

MNSC reiterates similar concerns, stating that “Consumers’ undergrounding plans provide another example of Consumers’ tendency to rush deployment of massive amounts of unproven capital. Liberty recommends a judicious approach, continuing pilots to carefully validate the cost/benefit of undergrounding before deploying such expensive work at massive scale.” MNSC’s reply comments, p. 21. In sum, MNSC avers that undergrounding specific to Consumers’ service territory needs to be specifically evaluated before additional resources are spent at customer expense.

Consumers replies to the Attorney General, stating that it has conceded that it “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.” Consumers’ reply comments, p. 30. Consumers contends that it “has proposed projects that align with the original selection criteria that the Commission approved when it approved the undergrounding

pilot” and states that “[a]dditional cost-benefit analysis is unnecessary to validate the value of the projects to customers.” *Id.*, p. 31.

In reply, the Staff indicates that it wishes to meet with Consumers and further discuss its LVD undergrounding pilot. Specifically, the Staff states that it:

would also like to learn about the extent to which the Company has assessed the 10.3 miles piloted in 2024, including the costs, expected benefits, and plan to expand the program over the next several years. This latter point should include how the pilot’s results influence the plan moving forward. Staff would also like to discuss the circuit selection criteria for LVD undergrounding that requires they serve 10-100 customers.

Staff’s reply comments, pp. 11-12.

The Commission agrees with the Attorney General and MNSC’s comments on this recommendation. The Commission remains skeptical of the costs of the undergrounding pilot at scale but is not opposed to further consideration of the project. More specifically, the Commission finds that additional evidence, including a BCA, is necessary to fully evaluate the proposed undergrounding and how it compares with other potential pathways to improved reliability performance, and encourages the company to review the results of its pilot and future plans with the Staff, including the circuit selection criteria.

k. Chapter II – Recommendation 6

Chapter II, Recommendation 6 avers that Consumers should “[r]evisit **substation transformer replacement and substation rebuild plans.**” Consumers Part Two Report, p. 78 (emphasis in original). This recommendation cites to Conclusion 15, which indicates that “[t]he **already very low contribution that substations make to SAIDI minutes, the Company’s strong inspection and maintenance practices, and the lack of high levels of transformer failure make the nearly \$800 million in EDIIP substation expenditures appear very high in relation to expected benefits.**” *Id.*, p. 77 (emphasis in original).

Consumers replies that it has over 1,100 substations which serve its customers and that 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.” Consumers’ initial response, p. 45. Consumers further notes “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.” *Id.*, pp. 46-47.

MNSC comments that Consumers over relies upon age as a factor in substation and transformer risk and replacement. MNSC states that Consumers’ methodology double counts for age because “when transformers are starting to fail due to age, higher dissolved gases will appear in dissolved gas analysis (DGA) testing. Therefore, DGA testing (which is a widely accepted industry practice) is sufficient for risk-profiling transformers.” MNSC’s initial comments, p. 19. Thus, MNSC avers that Consumers should remove any age-driven mechanisms and rely upon inspection, testing, and condition-driven programs.

In reply comments, Consumers again indicates its disagreement with the recommendation. The company also notes that it “will, of course, revisit the issue if the Commission adopts Liberty’s recommendation.” Consumers’ reply comments, p. 4.

The Commission partially agrees with Liberty’s recommendation that the company revisit its substation transformer replacement and substation rebuild plans. The Commission finds that age can be further reduced as a factor in the company’s substation transformer and substation health evaluation and agrees that the company may be overspending on this program. A reliable inspection program will demonstrate whether equipment needs to be replaced, and Consumers

should primarily use the results of its inspection program to drive investments for substation transformer replacements.

1. Chapter II – Recommendation 7

Chapter II, Recommendation 7 indicates that Consumers should “[r]edesign LVD substation transformer health assessment [sic] to minimize age as a factor in determining replacement levels and ensure that transformer acquisition commitments remain consistent with current estimates of EV [electric vehicle] penetration.” Consumers Part Two Report, p. 78 (emphasis in original). This recommendation cites to Conclusion 16, which states that “LVD service transformer purchases appear largely driven by demand from increased EV penetration, making them subject to the significant uncertainties that market [sic] has been experiencing.” *Id.*, p. 77 (emphasis in original).

Like above, Consumers reiterates that it monitors its “substations through inspections and maintenance activities.” Consumers’ initial response, p. 45. Further, Consumers states that age is already a minimal factor in a transformer’s health evaluation. Specifically, the company states that “[t]he current asset health factors place a 14% weight on a transformer’s overall health if the transformer is over 50 years old” and that this is an accepted industry practice for the life expectancy of a transformer. *Id.*, p. 46.

The Staff comments that it “agrees that more thorough inspection and testing of assets will not only be more cost-effective but will also improve insight into Consumers’ assets and overall condition.” Staff’s initial comments, p. 22. Further, the Staff notes that specific conditions should be considered, not only age.

Consumers replies that the age limit is well-supported by the industry and that “[i]dentifying transformers over 50 years of age helps the Company prioritize transformer replacement when

multiple transformers of differing ages have the same overall health characteristics, as determined by inspection practices as shown in the table above [illustrating contributing factors and percent allocation to the total assessment score of a transformer that is over 50 years old].” Consumers’ reply comments, p. 43. Consumers avers that by using age as a determining factor, it “can be assured that when these situations occur, the Company is replacing the transformer over 50 years of age before the one that is 30 years old.” *Id.*

As noted above, the Commission agrees that age can be further reduced as a factor in the company’s LVD substation transformer health assessment and that the company may be overspending in this category. In addition, the Commission finds that a reliable testing and inspection program will demonstrate whether equipment needs to be replaced, and Consumers should further reduce the reliance on age in its LVD substation transformer health assessment.

m. Chapter II – Recommendation 8

Chapter II, Recommendation 8 indicates that Consumers should “[e]liminate age as a factor in identifying HVD poles for replacement and evaluate the conditions required to support replacement on inspection of 100 percent of rejected poles.” Consumers Part Two Report, p. 81 (emphasis in original). This recommendation references Conclusions 17 and 18, which state that “[o]ver-reliance on pole age as a factor driving replacement exists for HVD poles, as it does for LVD poles,” and 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.” *Id.*, p. 80 (emphasis in original).

Consumers responds that it has no issue “with the recommendation to eliminate age as a factor in HVD pole replacements, as age currently is not considered.” Consumers’ initial response, p. 48. More specifically, Consumers states that:

[a]ge 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.

Id.

Like above, the Staff comments that it “agrees that more thorough inspection and testing of assets will not only be more cost-effective but will also improve insight into Consumers’ assets and overall condition.” Staff’s initial comments, p. 22. Further, the Staff notes that specific conditions should be considered, not only age.

Consumers replies that the “Staff and the Company are aligned with Liberty’s recommendations to reinstate groundline inspection and eliminate age as a sole replacement factor for low voltage distribution (“LVD”) poles.” Consumers’ reply comments, p. 6.

The Commission agrees with Liberty’s recommendation. More importantly, Consumers has indicated that age is not a determining factor and, therefore, no additional action is needed at this time.

n. Chapter III – Recommendation 1

Chapter III, Recommendation 1 states that Consumers should “[m]odify the SRM [Storm Response Manual] to allow for easier navigation and to address restoration history and control.” Consumers Part Two Report, p. 115 (emphasis in original). This recommendation cites Conclusion 1, which states that “Consumers employs a comprehensive, detailed, up to date, and professionally presented Storm Response Manual; however, its size (over 1,000 pages) suggests modifications to improve usability.” *Id.*, p. 112 (emphasis in original).

In response, Consumers notes acknowledgment that the goal 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.” Consumers’ initial response, p. 53. The company explains, however, that Liberty’s recommendation is based upon the review of the manual as a two-volume unpaginated document “even though the manual is designed and used as an interactive, web-based experience.” *Id.*

The Commission agrees with Consumers’ response and finds that no additional action is necessary.

o. Chapter III – Recommendation 2

Chapter III, Recommendation 2 states that Consumers should “[e]nsure **up-to-date succession planning for Restoration Management leadership roles.**” Consumers Part Two Report, p. 115 (emphasis in original). This recommendation references Conclusion 3, which indicates that the “[l]eadership of the Restoration Management organization is effective and engaged, but the group’s ‘bench strength’ is not apparent.” *Id.*, p. 112 (emphasis in original).

In its initial response, Consumers again acknowledges agreement with the intent of this recommendation. However, the company states that it:

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.

Consumers’ initial response, p. 55. In sum, Consumers avers that its current succession planning achieves the goal of this recommendation.

The Commission finds this recommendation to be important. However, the Commission acknowledges that Consumers has already taken action to achieve this goal. Going forward, the

Commission finds that Consumers should continue its succession planning efforts and demonstrate how it progressively “builds the bench” to expand its pool of future leaders and ensure continuity so that restoration performance will continue to improve.

p. Chapter III – Recommendation 5

Chapter III, Recommendation 5 indicates that Consumers should “[c]lassify 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.” Consumers Part Two Report, p. 116 (emphasis in original). This recommendation cites to Conclusion 7, which states that “Consumers does not use Event Classification as a catalyst for organizational mobilization in the event of a weather event.” *Id.*, p. 113 (emphasis in original).

Consumers replies that it “welcomes opportunities to improve its storm response preparation processes and procedures,” but contends that “the basis for Liberty’s recommendation is inaccurate and misstates the Company’s current processes for event classification, resource identification, and pre-storm communication.” Consumers’ initial response, p. 60. Consumers further indicates agreement with the intent of the recommendation but contends that it already “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.” *Id.*, p. 62.

In reply comments, the Staff states that Liberty’s analysis “showed that management did not classify any of these events prior to the event start date. Consumers’ event level classifications provide no specific guidance as to potential resource requirements.” Staff’s reply comments, p. 8. Referencing specific recent storms and outages, the Staff avers that additional analysis and classification of storms prior to the storm moving into the service territory may have resulted in

fewer outages and that “Consumers needs to continue working on pre-storm outage predictions as well as communication with the Commission before a storm event.” *Id.* Therefore, the Staff recommends that Consumers continue to improve its communication with the Staff by:

(1) classifying storms, (2) reaching out to vendors, and (3) communicating details to the Staff prior to a storm. *Id.*, pp. 9-10.

The Commission finds that Consumers is undertaking work to improve in this area. The Commission, therefore, encourages the company to continue its efforts and to work with the Staff in improving its processes and providing additional information to the Staff, consistent with the Staff’s above recommendation.

q. Chapter III – Recommendations 7 and 8

Chapter III, Recommendation 7 indicates that Consumers should “[i]dentify a [wire down] call out objective and a time frame to reach that objective.” Consumers Part Two Report, p. 117 (emphasis in original). This recommendation cites to Conclusion 13, which states that “[w]ire [d]own call out responsiveness has been poor.” *Id.*, p. 114 (emphasis in original). In addition, Chapter III, Recommendation 8 states that Consumers should “[i]dentify a time frame for reaching the wire down secure time objective of two hours for MSAs [metropolitan service areas] and non-MSAs and provide regular reporting to management on the status of improvement efforts.” Consumers Part Two Report, p. 117 (emphasis in original). This recommendation cites to Conclusion 14, which states “[w]ire down response time is poor.” *Id.*, p. 114 (emphasis in original).

In its initial response, Consumers notes that the intent of Recommendation 7 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.” Consumers’ initial response, p. 64. In that regard, Consumers notes its agreement that the recommendation may “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.” *Id.* Going forward, Consumers notes that it will continue to evaluate its performance to find areas for improvement and create mitigation strategies to improve performance. *Id.*, p. 65.

With regard to Recommendation 8, Consumers comments that it is fulfilling this recommendation by “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.”⁶ Consumers’ initial response, pp. 65-66. Further, Consumers indicates that it understands the intent of this recommendation and “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.” *Id.* The company also addresses opportunities highlighted by Liberty, noting that it “is taking advantage of these opportunities by improving its processes and upgrading

⁶ The Commission notes that the wire down relief factor is not a percentage of customers but rather “the annual percentage of the first responder guarded downed wires that are relieved by an electric utility or cooperative representative within the time period specified in [Mich Admin Code,] R 460.723” per Mich Admin Code, R 460.702(w), with R 460.723 subrules (1) and (2) stating:

(1) It is an unacceptable level of performance for an electric utility or cooperative to fail to respond to a request for relief of a first responder guarded downed wire at a location in a metropolitan statistical area within 120 minutes after notification at least 90% of the time under all conditions.

(2) It is an unacceptable level of performance for an electric utility or cooperative to fail to respond to a request for relief of a first responder guarded downed wire at a location in a non-metropolitan statistical area within 180 minutes after notification at least 90% of the time under all conditions.

its technology,” which it expects to implement in 2024, and states that the “metric’s performance will be tracked through reporting channels like the Rally Room for continued accountability as Liberty recommended.” *Id.*, p. 69.

The Staff recommends that Consumers “re-assess the number of wire down response resources necessary, considering the number of downed wires that have occurred and are projected, develop a resource plan, and execute the resource plan to ensure internal targets and Commission-required response times are met.” Staff’s initial comments, p. 32. In this reevaluation, the Staff notes that “all personnel in the Company that do not go out in the field to repair damages, [should be] listed as available resources for downed wires.” *Id.* The Staff adds that it would like to be notified “when the Company experiences a wire down that causes, in the utility’s initial estimation, \$50,000 or more in property damage.” *Id.* Further, the Staff recommends increased transparency regarding the frequency of storms experienced year to year. The Staff emphasizes that it is of the utmost importance that “all wire downs are de-energized before any company personnel leaves the area.” *Id.* Overall, the Staff notes that Consumers should modify its internal wire down policies and procedures.

In reply comments, Consumers addresses the Staff’s concerns. First, the company notes agreement with the intent of the Staff’s recommendation to re-assess the number of wire down resources needed. Consumers explains that its:

forward-looking wire down strategy will better integrate technological enhancements to de-energize or secure wire downs and to enhance the Company’s ability to identify third-party wire downs. This technology, coupled with traditional wire down resource planning and dispatching, will help the Company further optimize how it dispatches wire down responders, resulting in faster response times and improved public safety while reducing restoration costs.

As part of this strategy, in late November 2024, the Company implemented a new Advanced Distribution Management System (“ADMS”) software module in its Outage Management System called “Wiredown Prediction.” The Company is

currently testing and evaluating the module's initial performance, and it looks forward to discussing the module's performance with Staff in the future.

Consumers' reply comments, p. 13. The company finds that the Staff's request regarding notifying the Staff regarding property damage is "feasible within reasonable parameters" explaining that a formal framework should be established for this request. *Id.* Regarding transparency in storm reporting, the company notes it "is happy to provide more information as needed and invites Staff to clarify its request." *Id.*, p. 14. Consumers also notes that it "has a longstanding policy in place requiring downed wires to be verified as de-energized before a wire guard is relieved." Consumers' reply comments, p. 16.

The Commission finds merit in this recommendation and in the Staff's comments on this topic. Additionally, Consumers' reply comments demonstrate a willingness to work with the Staff regarding its concerns in this area. Consumers specifically points out in its reply comments that it already has a policy in place to verify that downed wires are de-energized prior to wire guards being relieved. In that regard, the Commission finds that additional review of Consumers' internal wire down policies and procedures is necessary to increase transparency and clarity. Therefore, the company shall file a report including the information requested by the Staff in its initial comments. *See*, Staff's initial comments p. 32. While the company's response to the Staff's comments is a step in the right direction, the Commission finds this additional information is still necessary. The report should also include Consumers' proposed solutions to improve performance in this area. Given the above, Consumers shall file a report that includes, at a minimum, the following information:

- the number of wire down personnel available to be dispatched during catastrophic, gray sky, and blue sky events;
- of the personnel identified above, the number of these individuals that are line workers;
- the company's current wire down protocols;

- the utility’s plans to update its internal wire down policies and procedures, including the timeline for any planned updates and how the company’s personnel needs change as a result of and/or to facilitate these updates; and
- a description of the company’s efforts to educate the public on the hazards of downed wires, including an explanation of how its education efforts can be expanded and improved in the future.

Consumers Energy shall file this report no later than 5:00 p.m. (Eastern time) on August 29, 2025.

Consumers is also directed to work with the Staff to develop additional wire down reporting information for inclusion in the Case No. U-21122 reporting template. The Commission envisions that the new reporting will be limited to downed wires that caused \$50,000 or more in estimated damage costs and include the following information for each downed wire: cost estimate, cause of wire fall, circuit, circuit voltage, and date of wire fall.

a. Chapter III – Recommendation 10

Chapter III, Recommendation 10 states that Consumers should “**[e]xplore means to balance company and customer interests in addressing highly volatile restoration costs following completion of the preceding recommendation addressing budgeting for storm restoration.**”

Consumers Part Two Report, p. 118 (emphasis in original). This recommendation references Conclusion 15, which indicates that “**[d]ifferences among budgeted, actual five-year average, and EDIIP planned O&M expenditures are extreme.**” *Id.*, p. 114 (emphasis in original).

The company responds that it agrees with Liberty’s review, and that its testimony in the ongoing rate case echoes this recommendation. Consumers’ initial response, p. 72.

The Attorney General responds that with respect to any “ratemaking aspect of recovery of service restoration expense, if Liberty is advocating a change to the five-year average methodology, the recommendation is inappropriate.” Attorney General’s initial comments, p. 17. Further, she states that this “recommendation will not likely have an impact on service reliability or restoration time improvement and should be disregarded by the Commission.” *Id.*, p. 18.

In reply, Consumers states that it “is always open to input” from interested parties “on how to improve the current cost-recovery construct that relies on a five-year average.” Consumers’ reply comments, p. 46. Further the company notes agreement that “restoration costs must be proposed and fully evaluated in a rate case.” *Id.*

The Staff also replies, noting its concerns “with the overall future costs of storm restoration expenses.” Staff’s reply comments, p. 6. The Staff further states “that proactively inspecting, maintaining, and investing in the system will be important in shifting the reactive storm response spending.” *Id.* Overall, the Staff contends that it “does not support any Storm Restoration Cost Sharing Mechanism or any accounting deferrals for storm restoration expenses” and further “recommends [that] the Company focus on proactive investments and cost control to help manage increasing service restoration costs.” *Id.*, p. 8.

In Chapter III, Recommendation 9, Liberty made clear that it does not believe that establishing future restoration costs based on a five-year historical average results is an adequate balance of costs between the company and its customers because Consumers is continuing to improve its system. Consumers Part Two Report, pp. 117-118. The Commission has most recently approved recovery of the company’s projected storm restoration costs based on a five-year historical average of O&M expense. *See*, March 21 order, p. 300. However, the Commission is open to other methods of projecting costs and will consider these methods in future rate cases as supported by material evidence on a case-by-case basis, as it has in past rate cases.

b. Chapter IV – Recommendation 2

Chapter IV, Recommendation 2 states that Consumers should “[c]ommunicate with customers requiring medical equipment prior to a storm.” Consumers Part Two Report, p. 143 (emphasis in original). This recommendation references Conclusion 1, which indicates that

“Consumers’ customer outage experience has proven problematic during recent large storms.” *Id.*, p. 140 (emphasis in original).

In reply, Consumers acknowledges that this recommendation is related to a potential safety concern. However, Consumers does not agree with Liberty’s recommendation. Consumers states that it:

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.

Consumers’ initial response, p. 77. Consumers further explains that to implement a new system, it would need additional customer data, and thus requests that the company be allowed “to monitor its current Storm Playbook, which was recently put in action, to determine if the process works to alert customers.” *Id.*, p. 79.

The Commission acknowledges the company’s response but finds that cost-effectiveness is not the only consideration when addressing issues pertaining to customers with specific needs. As noted in the Staff’s Straw Proposal on Critical Facility Resilience, filed in Case No. U-21388, the “Staff recommends the Commission collaborate with utilities to explore current practices for working with individual households with critical care customers during sustained outages.” Case No. U-21388, filing #U-21388-0010, p. 23. While the Commission appreciates the company’s desire to monitor its recently implemented Storm Playbook, additional work is needed to make improvements in this area as this is a safety concern, particularly for critical care customers.

B. Additional Comments

In addition to the above, the Commission finds there were additional comments that need to be addressed.

1. Capital Versus Operations and Maintenance Expenditures

Many comments note that both Consumers and DTE Electric should reduce capital spending in favor of increasing O&M expenses. As discussed above, this comment was prevalent in the discussion regarding line clearing cycles. The Commission finds that it is currently reviewing potential improvements to the rate case process in Case No. U-21637 and potentially reviewing capitalization practices in the near future as referenced in recent rate case orders. *See*, March 21 order, pp. 21-22; January 23, 2025 order in Case No. U-21534, p. 368. Moreover, the Commission emphasizes that all expenditures must be supported by evidence in the record.

2. Performance Metrics

The comments also raised questions regarding the appropriate performance metrics and what best represents actual performance. The Attorney General specifically responds to Consumers' discussion relating to SAIDI, noting that the company failed to address the fact that the audit "presents both SAIDI results with Major Event Days (MEDs) and SAIDI excluding MEDs" and that the "company's comments focus only on SAIDI results excluding MEDs." Attorney General's initial comments, p. 11. Similarly, MNSC noted that Consumers "attempts to obfuscate reality by contriving a less accurate but more favorable metric." MNSC's initial comments, p. 6.

The Commission finds that the topic of metrics is being examined by the Commission's Financial Incentives and Disincentives workgroup as well as through its ongoing work in Case No. U-21400. Therefore, the Commission declines to review the issue in this case; however, it notes that the Commission directed DTE Electric and Consumers to include "a baseline for the all-

weather SAIDI metric” as outlined at page 30 of the February 27, 2025 order in Case No. U-21400.

3. Audit Response Metrics

In comments, many interested persons suggested that the Commission should create audit metrics or further review the utility’s compliance with the audit recommendations in future distribution plans or rate case proceedings. *See*, MNSC’s initial comments, pp. 39-40; *see also*, CEOs’ initial comments, p. 9. While the Commission appreciates the feedback, the Commission notes that the audit was designed to inform strategies and priorities. Further, the best practice will be to incorporate these results into existing proceedings to become embedded into all proceedings versus creating new standalone audit metrics.

4. Affordability and Transparency in Billing

Many comments reference an overall utility focus on shareholder returns at the expense of customers and the lack of affordable rates. *See*, Ann Arbor’s initial comments, p. 13; Attorney General’s initial comments, p. 19; MNSC’s initial comments, pp. 40-41. The Commission finds that these concerns are most appropriately addressed in the rate case proceedings where investments are reviewed and analyzed by the Staff and intervenors. As mentioned above, the Commission is evaluating Financial Incentives and Disincentives to align incentive measures with performance. The Commission has approved the use of investment recovery mechanisms to ensure spending occurs where authorized and increase accountability. The Commission has continued to provide guidance and expects to continue reviewing this in other proceedings. The Attorney General also discussed clarity in rate impacts with regard to tree trimming cycles. *See*, Attorney General’s comments, pp. 14-15.

The Commission finds that increased transparency in costs to customers is being evaluated in other areas. For example, the Staff's Distribution Planning Proposal in Case No. U-20147 incorporates a Customer Affordability Analysis which would include rate impacts by customer class. Similarly, the Commission has ongoing work surrounding the evaluation of affordability concerns—specifically, the continued work of the Commission's Energy Affordability and Accessibility Collaborative, including the work of the Affordability, Alignment, and Assistance subcommittee.

THEREFORE, IT IS ORDERED that:

A. The Commission adopts the findings and recommendations of the Liberty Consulting Group's September 23, 2024 Final Report, Utility Distribution Audit of Consumers Energy Part One and Part Two, as discussed above.

B. Consumers Energy Company shall file a report in this docket pertaining to wire downs, consistent with this order, no later than 5:00 p.m. (Eastern time) on August 29, 2025. In addition, Consumers Energy Company shall work with the Commission Staff to develop additional wire down reporting information for inclusion in the Case No. U-21122 reporting template, as described in this order.

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 June 12, 2025.

Lisa Felice, Executive Secretary

PROOF OF SERVICE

STATE OF MICHIGAN)

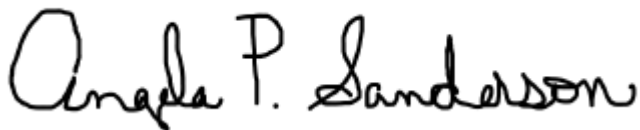
Case No. U-21305

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on June 12, 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 12th day of June 2025.



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

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