

STATE OF MICHIGAN  
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter, on the Commission’s own motion, to )  
consider options to expand opportunities for public )  
engagement in its decision-making process and ) Case No. U-21638  
procedures. )  
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At the July 10, 2025 meeting of the Michigan Public Service Commission in Lansing,  
Michigan.

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

**ORDER**

**Background**

Section 6aa of Public Act 231 of 2023 (Act 231), MCL 460.6aa, states in relevant part:

(1) The commission shall annually conduct at least 4 public meetings, hearings, townhalls, or other opportunities for public engagement in areas geographically dispersed throughout this state. The commission shall set the time, place, and manner of opportunities for public engagement under this subsection to take comments from and encourage meaningful participation by low-income residential customers, residential customers who experience high energy burdens, and individuals and communities likely to be impacted by the outcome of commission proceedings. Any public meeting, hearing, townhall, or other opportunity for public engagement the commission is otherwise required by law to conduct may count toward fulfilling this requirement.

(2) Not later than June 1, 2024, the commission shall open a proceeding to consider options to expand opportunities for public engagement in its decision-making processes and procedures with respect to all of the following:

(a) The accessibility and transparency of the commission’s decision-making processes.

- (b) Opportunities for participation in the commission’s decision-making processes, especially by low-income residential customers, residential customers that experience high energy burdens, and individuals and communities impacted by commission decisions.
- (c) The responsiveness of commission decisions to community needs and priorities.

On May 23, 2024, the Commission issued an order in this case (May 23 order):

invit[ing] comment regarding additional improvements that it may make for communicating with the public and explaining Commission activities, expanding accessibility and participation, and enhancing the transparency of its proceedings. The Commission encourages individuals providing comments in this docket to consider issues raised in the MI Power Grid Customer Education and Participation Staff report surrounding the challenges of public engagement at utility regulatory commissions, specifically the importance of building trust with customers and the unique challenges related to engaging customers in a highly technical field that is, by law, regulated through complex legal proceedings. The Commission also welcomes suggestions for assisting and improving the participation of “low-income residential customers, residential customers that experience high energy burdens, and individuals and communities impacted by commission decisions,” as provided for in MCL 460.6aa(2)(b).

May 23 order, p. 7 (footnote omitted). Specifically, the Commission stated that it had an interest in the following questions:

1. What role should advocates, intervenors, or community-based organizations have to engage and educate customers?
2. What opportunities are available for the Commission to work with intervenors and/or potential intervenors to enable effective and efficient participation by intervenors in the contested case process?
3. Are there examples of public utility commissions that incorporate public comment or other public engagement opportunities in commission proceedings? What are the statutory and/or other constraints around that engagement?
4. Considering resource and statutory time limitations, how should the Commission prioritize between different types of participation/engagement opportunities? What value do those opportunities provide compared to other opportunities?

5. What examples exist regarding effective methods and metrics to evaluate the responsiveness of Commission decisions to community needs and priorities and Commission transparency?

May 23 order, pp. 8-9 (footnote omitted). The Commission stated that written initial comments were due no later than 5:00 p.m. (Eastern time (ET)) on September 27, 2024, and reply comments were due no later than 5:00 p.m. (ET) on October 25, 2024. The Commission received six timely written initial comments and two timely written reply comments.

The Commission also held a public hearing on August 28, 2024, in Flint, Michigan, during which the Commission received several public comments.

### Comments

1. August 28, 2024 Public Hearing

Five people provided comments at the August 28, 2024 public hearing at the University of Michigan – Flint. Boratha Tan states that he has a professional connection to Vote Solar and is a community member in Detroit, Michigan. Mr. Tan notes that, in Illinois, “when the multi-year grid plans and the multi-year rate plans were in effect, the utilities were required to offer collaborative workshops with the public and with interested [persons].”<sup>1</sup> 1 Tr 24. Mr. Tan also states that, as a community member, he has noted that many neighbors are unfamiliar with the rate case and integrated resource plan (IRP) processes. Mr. Tan asserts that there is a need for workshops and engagement to help the public understand the steps and issues in contested cases. He states that this “would be very helpful for the public when they do engage in public comments to be more effective, and more concise, and more efficient in their comments.” 1 Tr 26.

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<sup>1</sup> In an effort to maintain alignment with industry best practices in language and terminology, the Commission no longer uses the word “stakeholders” in its orders, to the best extent possible. Thus, all references to “stakeholder(s)” in this order have been modified to reflect “interested person(s)” instead.

John Richter states that there are barriers preventing broader engagement in contested cases. He asserts that contested cases involve “complex and arcane regulatory concepts” and that “[i]t is virtually impossible to provide meaningful input to a system based on concepts that one doesn’t understand. If you want to address this area, the [Commission] staff [(Staff)] could [provide] public links to existing educational material on regulatory processes and hold some public education sessions.” 1 Tr 26-27. Specifically, Mr. Richter recommends the courses offered by the Institute of Public Utilities at Michigan State University. In addition, Mr. Richter suggests that the Commission could document and publicize its own processes, such as creating a new public education section on the Commission’s website with various hyperlinks. Mr. Richter also notes that an attorney is required to participate as an intervenor in a contested case, which may not be a practical option for members of the public. He states that “[p]erhaps the Commission staff could provide educational sessions, preferably online and not during business hours, which would conclude with a survey of the person’s views. To make this meaningful, the survey results could then be read into the record of the case.” 1 Tr 28.

Sergio Cira-Reyes states that he works for Urban Core Collective (UCC) and is a community member in Grand Rapids, Michigan. He contends that community members seek assistance from trusted community organizations when they feel that there are inequities in a system. Mr. Cira-Reyes asserts that “by the time the employees of that organization come to understand that system,” acquire “a working knowledge of the system, become practically experts in that . . . system, and can engage with that system to challenge it, legally or otherwise,” the utilities and intervenors “that have the funds, the resources, the influence on that system, have a significant advantage compared to [the] community.” 1 Tr 29. To address this issue, Mr. Cira-Reyes states that the Commission, not community organizations, should be responsible for ensuring that the

public has an ability to engage with the Commission, such as using “funds through the participatory board” and accepting video comments that describe the community member’s personal experience. 1 Tr 29. Furthermore, he recommends that the Commission provide a news channel that will “translate . . . to the general public what is happening” at the Commission “and how [the public] can engage in a way that is accessible to them.” 1 Tr 31.

Ben Walton states that he works for Oxfam America and is a community member in Kalamazoo, Michigan. Mr. Walton asserts that “[t]he Commission must create spaces for engagement that are inclusiveness [sic] and accessible for all people. This includes practices around outreach, continuing to hold hearings in these local community spaces, and working with community organizations to make those spaces accessible, and overall collecting testimony and stories from these individuals in the community.” 1 Tr 32. He contends that the recommendations from marginalized communities, low-income households, immigrants, and refugees should be prioritized. In addition, he states that working families should be included in the decision-making process, explaining that “these decisions are directly impacting their day-to-day life and their bottom dollar. People should not have to choose being [sic] paying between . . . electricity and food and medicine.” 1 Tr 33. Furthermore, he questions the propriety, equity, and frequency of utility rate increases.

Mike Buza states that he is the chair of the Legislative Committee for the Sierra Club. To inform a variety of communities impacted by the Commission’s work, he recommends that the Commission reach out to churches and community groups, which may encourage participation in the Commission’s public meetings. *See*, 1 Tr 35.

## 2. Written Initial Comments

Comments from two individuals were filed in the Comments section of this docket. One comment requests that the Commission consider that utility rate increases benefit small businesses that are hired by the utility to construct grid resiliency and solar fields, and the other comment recommends that the Commission examine the clean energy industry for better energy benefits. *See*, filing #U-21638-0001-CC and filing #U-21638-0002-CC.

The Natural Resources Defense Council; Ecology Center, EcoWorks; Legacy & Love LLC; Michigan Environmental Council; Michigan Environmental Justice Coalition; Michigan League of Conservation Voters; Sierra Club; Sistas in Development, LLC; Soulardarity; UCC; and We Want Green Too (collectively, MNSC) state that “[i]n order to cultivate meaningful, regular engagement by individuals and community groups - particularly those from low-income communities - the Commission must invest its own time and resources in generating a pipeline of people knowledgeable about the Commission’s opportunities and processes.” MNSC’s September 27, 2024 initial comments, p. 7. MNSC states that the Commission should offer outreach and “‘train-the-trainer’ sessions for community leaders, where stipends are provided for participation, as well as downloadable materials which can be shared widely.” *Id.*, p. 8. As an example, MNSC cites the materials provided and the events hosted by the Pennsylvania Public Utility Commission that “educate the educator.” *Id.*

In response to Question 1 posed by the Commission in the May 23 order, MNSC asserts that advocates, intervenors, and community-based organizations are only one part of the approach to engaging and educating customers. In MNSC’s opinion:

[t]he Commission, as the regulatory agency, has significant control over how much public engagement occurs and how community concerns are incorporated into the Commission’s decision-making process, as well as Staff’s role in that process. The Commission is the entity that holds the knowledge, and is therefore in the best

position to set the tone and structure for public engagement, as well as to provide the necessary information to educate the public and allow for its informed participation.

*Id.*, pp. 8-9. MNSC also suggests that “[t]he Commission should consider how to partner with community organizations and leaders to train, fund, and share information on the Commission’s regulatory framework and how to participate in Commission proceedings, as mentioned earlier.”

*Id.*, pp. 9-10. MNSC states that this type of partnership will require financial compensation for the community leaders involved in the process.

MNSC recommends that the Commission regularly convene a group of financially compensated community leaders to discuss industry topics, priority issues, and public outcomes. In addition, MNSC suggests that “[p]eople and organizations with past experience as formal intervenors in cases, or other experience working with the Commission, can serve in a mentoring role with new or potential intervenors. These roles must come with financial and capacity support and would be integral to opening the door to additional participation.” *Id.*, p. 10. Furthermore, MNSC states that, in contested cases, intervenors and advocates could sponsor community members to testify as witnesses regarding outages, shutoffs, and low-income pilot programs. MNSC asserts that “the Commission’s procedural rules should deem such testimony to be inherently relevant, admissible, and thereby entered into the record of the proceeding as evidence to be considered in the decision-making process (a process which is proposed in more detail below in response to Question 3).” *Id.*

In response to Question 2 posed by the Commission in the May 23 order, MNSC states that the Commission should “address the Commission’s rule that prohibits public comments from being included in the evidentiary record in contested cases (*see* Administrative Hearing Rule R792.101413 [sic 792.10413]).” *Id.*, p. 11. MNSC contends that people are unlikely to participate

as intervenors in contested cases and the Commission should create an opportunity to consider community opinions as evidence on the record in a contested case. In addition, MNSC states that “[t]he Commission should be more transparent with the public about the (current) low-impact of public comments, and related impediments to the Commission utilizing public input, in contested cases,” asserting that the public comment section of the Commission’s website does not notify commentors that their comments will not be considered as evidence on the record. *Id.*

Furthermore, MNSC states that if the Commission declines to adopt a proposal suggested by a commentor because of legal constraints, the Commission should explain the legal impediments so the public and “advocates can better understand the applicable law.” *Id.*, p. 12.

MNSC suggests that the Commission redesign its website to include more plain language, easy-to-understand information, and instructions for participating in Commission proceedings. MNSC cites Minnesota Public Utilities Commission’s (MPUC’s), Connecticut’s Public Utilities Regulatory Authority’s, Colorado Public Utilities Commission’s (CPUC’s), and California’s Public Utility Commission’s websites as examples. MNSC states that the updated website should also include the following content, available in accessible formats, different languages, and reading levels:

- An overview of the [Commission]’s responsibilities and jurisdiction.
- The types of cases and other proceedings the [Commission] adjudicates and how the public may participate, including an explanation of intervention and pro se representation.
- The ability to accept video comment submissions. [Interested persons] have indicated that video submissions may be more effective in engaging members of the public, particularly when facilitated by the community organizations themselves, which may find it easier to collect and submit video comments on behalf of their constituencies.

- A list or calendar of upcoming opportunities for comment (separate from the general [Commission] calendar) with links to the case specific information described below.
- Information on mechanisms for the public to track cases and receive relevant notifications, accompanied by summaries of significant pending cases and opportunities for participation.
- Description of and link to the UCPB [Utility Customer Participation Board] for financial resources. Work with the UCPB to ensure they have the resources to effectively work with applicants to be successful.
- Links or fillable forms for public comment submission (in either traditional written form or through less conventional video submissions), ideally with automatic integration of these comments into the formal case record.
- Tips for crafting meaningful public comments to empower individuals to participate more effectively.
- Preparing case summaries like the issue briefs for at least rate cases and integrated resource plan dockets that include key information like proposed rate increases, projected bill impacts, ROE [return on equity] requested, stated drivers of increase, date and amount of last increase granted, and the like to allow prospective intervenors to understand what the case is about without having to read hundreds of pages of testimony. These could be posted as part of case-specific webpages for significant cases to house a variety of resources.

*Id.*, pp. 12-14 (footnotes omitted).

MNSC also notes the suggestions it provided in Case No. U-21637, which is specific to rate cases. MNSC asserts that these recommendations are also relevant for other contested cases:

- Develop standards and templates for discovery, testimony, and briefing so that intervenors do not have to start from scratch.
- Maintain and provide intervenors access to an organized history of recent regulatory cases pertaining to each utility, which would maintain consistency and continuity, and improve transparency. These histories could be built off of the case summaries suggested above.
- Automatically provide audit responses to all intervenors.
- Standardize a repository for applications and discovery materials for each case:

- Each utility should provide all parties with access to a shared file for testimony, revised testimony, exhibits, supporting documents, discovery responses, and Staff audit responses;
  - This shared file should be indexed and searchable;
  - Discovery responses should be served as complete sets, except in rare circumstances, and attachments should be available in the repository when responses are served.
- Require a standard disputed issues chart – like the one some ALJs [administrative law judges] currently request utilities to provide for briefing – and require utilities to create it. These should include all issues and related witnesses and exhibits. Utilities should be required to file these in the public docket to facilitate participation by non-intervenors and improve transparency.
  - Adopt an amicus-type status and process, which would create an opportunity for non-intervenors to file comments or briefings on issues, so that their perspectives and arguments will be considered in the Commission’s decision-making. The standardization and filing of disputed issues charts (described above) would further facilitate this.
  - Require Staff to summarize comments received by a certain date and include them in Staff testimony; Staff can be cross-examined on their contents. Other states, such as Oregon (described in more detail in response to Question 3), do this effectively.
  - Support the creation and maintenance of a public database of information about rate cases, including rate amounts, issues, and outcomes.

*Id.*, pp. 14-15. Furthermore, MNSC recommends that the Commission should provide an internal public advocate that represents the needs of impacted communities, similar to the efforts of California and Colorado.

In response to Question 3 posed by the Commission in the May 23 order, MNSC asserts that the Commission should amend its “administrative rules to allow public comments to be admitted into the evidentiary record for contested case proceedings under certain conditions, among other amendments that would facilitate public engagement and lead to more equitable outcomes and decisions that reflect the needs and concerns of all customers.” *Id.*, p. 21. MNSC contends that

Oregon, Minnesota, Washington, Maryland, and Georgia have public participation frameworks that Michigan could adopt.

In Question 4 posed by the Commission in the May 23 order, the Commission asked how it should “prioritize between different types of participation/engagement opportunities” and “what value do those opportunities provide compared to other opportunities?” May 23 order, p. 9.

MNSC responds that “[g]iven the resource limitations and the statutory constraints described above, the Commission should first prioritize actions that are achievable under the current rules and provide significant and lasting impact.” MNSC’s September 27, 2024 initial comments, p. 21. Specifically, MNSC contends that the Commission should prioritize improving its website and educational materials/opportunities. In addition, MNSC asserts that the Commission should provide “[a]gency-wide guidance for Staff on managing and responding to public comments and complaints [that] would foster internal consistency at the Commission, further supporting the Commission’s broader public-facing improvements.” *Id.*, p. 22. However, MNSC argues that more importantly, the Commission should expand public outreach by:

conducting regular community events to share information on the Commission and available programs and opportunities to increase awareness and build relationships, such as Pennsylvania’s educate-the-educator “Be Utility Wise Events” described earlier; creating a (compensated) community advisory group that meets regularly with the Commissioners and Staff to provide a space in which to discuss issues and concerns, as well as offer guidance and input on community needs; and holding listening sessions to increase the Commission’s understanding of communities’ experiences and needs.

*Id.* MNSC recommends that the Commission require the utilities to provide reports regarding community engagement activities, how the utility evaluated the information received at the engagement activity, and any changes implemented based on the information received.

MNSC also asserts that, similar to the process followed by the Washington Utilities and Transportation Commission, the Commission could amend its rules to permit “public witnesses

[to] provide sworn statements during designated hearings,” which “would be recorded, transcribed, and incorporated into the official evidentiary record, ensuring that public input holds legal weight in the decision-making process [similar] to formal testimony provided by parties to the case.” *Id.*, p. 23. Additionally, MNSC contends that the Commission could promulgate a rule that requires the Staff to review, process, summarize, and report on public comments, with representative examples included in the Staff’s testimony and entered into record evidence. Furthermore, MNSC states that the Commission:

should also consider amendments to the rules that lift up equity and environmental justice [(EJ)] considerations in contested cases by requiring a formal analysis of equity and environmental justice impact in all contested cases. These analyses would be informed in part by public comments that specifically address how proposed regulatory decisions may affect marginalized or underserved communities, as well as the environmental consequences of the utilities’ actions.

*Id.*, p. 24. In the event the Commission amends its rules to implement these suggestions, MNSC asserts that the process should be transparent and involve the public and advocacy groups.

In response to Question 5 posed by the Commission in the May 23 order, MNSC states that “[t]he Commission should incorporate metrics regarding its community responsiveness into an annual or biannual ‘scorecard’ to provide a visual assessment of the Commission’s progress, along with narratives explaining the results.” *Id.*, p. 24 (footnote omitted). MNSC contends that the Commission should ensure meaningful engagement, which measures whether a sufficient number of persons and/or community organizations are able to participate in a manner that impacts outcomes. MNSC suggests the following metrics:

- **Representation:**
  - The number of new intervenors, and the number of those that have participated in less than three (or more) cases;
  - The number of intervenors that have participated [sic] more than three (or more) cases, showing longer duration input;

- The participation rate of community representatives in contested cases versus other types of participants.
- **Accessibility/Ability to Participate:**
  - The distribution and use of educational materials;
  - The number of educate-the-educator sessions;
  - The number of participants in these sessions;
  - Number of public visitors to the website;
  - Number of public visitors accessing toolkits and educational videos;
  - Availability of tools that make Commission proceedings more accessible, such as transcripts, materials in different languages, translation services, resources for the hearing impaired [sic];
  - Results of community surveys regarding public awareness of the Commission’s jurisdiction and specific proceedings;
  - Review of utility engagement work, including utility customer outreach and education efforts, barriers to program adoption, lessons learned, opportunities for improvement and coordination.
- **Impacts Outcomes:**
  - Number of instances where community suggestions or feedback have been incorporated into final decisions or action;
  - Results of community surveys to, or other outreach / interviews of, intervenors after the end of a case containing feedback on the process and outcomes, including whether the intervenors felt heard, their ability to meaningfully participate, and if they believe their effort had any impact on the Commission’s decision-making process.
  - Results of community surveys regarding the degree to which Commission decisions involving community input led to positive quality of life improvements for those communities, such as economic benefits or social cohesion.
  - Metrics around utility investments in environmental and energy justice for communities with low incomes and high energy burdens, including efforts to reduce energy burdens, anticipated benefits, and measurement of actual benefits.

- List of the specific positions adopted by frontline organizations in the previous year and the Commission’s response to those positions, identifying where the position and responses aligned, partially aligned, or did not align. This would allow for an issue / outcome analysis.

*Id.*, pp. 25-26 (emphasis in original) (footnote omitted). MNSC states that the Commission should maintain an annual or biannual scorecard that provides a report of public engagement activities for the time period, how the information gleaned from these activities has or has not impacted Commission decisions, and efforts the Commission will continue, modify, or terminate in the future.

The Ecology Center, the Environmental Law and Policy Center, the Union of Concerned Scientists, and Vote Solar (collectively, the Clean Energy Organizations (CEOs)) “believe that public engagement is key to building public trust in the Commission and providing the public more opportunities to participate in front of the [Commission].” CEOs’ September 27, 2024 initial comments, p. 1. The CEOs note that, in Illinois, the Illinois Commerce Commission (ICC) staff must host workshops prior to a utility initiating a contested case. The CEOs state that “[a]t the workshops, the utilities present to the public and other [interested persons] the details of their filing, and then gather input from these [interested persons].” *Id.*, p. 2. In addition, the CEOs explain that the ICC engaged an external consultant to lead the workshops, the ICC staff provided reports summarizing the information shared at the workshops, and the ICC staff provided recommendations to the ICC Commissioners for next steps. The CEOs:

recommend that the Commission investigate the effectiveness of “pre-filing workshops” and implement these workshops prior to the next rate case or [IRP] so that Michigan ratepayers can engage and provide feedback on dockets they are interested in. The Commission can improve this process by entering the Staff report summarizing workshop engagement into the record evidence for each given case.

*Id.*

The CEOs also assert that the Commission should consider the CPUC’s changes to their own communication and education. Specifically, the CEOs recommend that the Commission:

- Explore ways to provide pamphlets, one-pagers, and websites that provide information of significant dockets (such as rate cases and IRPs) to the public, in the public vernacular. This information should include estimated increases to an average bill or projected growth of renewable energy.
- Provide significant notification of public hearings on certain contested cases, and provide the public with ways to attend (such as having a map of handicap accessible parking/seating, easy instructions for virtual participation, etc.)
- Provide the public a list of intervenors for contested cases, and highlight consumer-protection intervenors such as the Citizens Utility Board of Michigan and the Michigan Attorney General’s Office.

*Id.*, p. 3.

Furthermore, the CEOs recommend that the Commission work with local organizations to conduct workshops or webinars regarding the Commission’s cases/proceedings. Additionally, the CEOs request that the Commission require the utilities to include information on customer bills that explains rate increases, the estimated impact for the customer, and guidance on how to provide public comments in a rate case.

The CEOs express support for MNSC’s proposal that the Commission convene an advisory group that includes community leaders. The CEOs state that “[t]hese advisors would be tasked with meeting regularly with the Commissioners to discuss big issues and other relevant topics. In return for their service in this group, community leaders would be compensated fairly.” *Id.*, p. 4. The CEOs assert that Minnesota and Wisconsin offer compensation to intervenors who participate in contested cases.

The CEOs also support Mr. Cira-Reyes’ comments on behalf of UCC. The CEOs note that Mr. Cira-Reyes:

spoke about [UCC's] public engagement event in Grand Rapids, where the organization provided a space for residents to film themselves and provide first-hand accounts of how they experience outages and energy burden. The Commission could consider a "video option" to include in their public commenting section, as well as other avenues to host such a video option where residents can share their experiences to the [Commission] and the public.

*Id.*, pp. 4-5. The CEOs cite the MPUC's instructions for submitting video comments as an example that the Commission could adopt.

The Michigan Department of Attorney General (Attorney General) states that "[m]any of the Commission's actions/activities" that the Commission has already implemented "are consistent with the types of actions the Attorney General would recommend, including workshops and other collaboratives, public meetings and townhalls," which are discussed more fully in response to the questions set forth in the May 23 order. Attorney General's September 27, 2024 initial comments, p. 3.

In response to Question 1 posed by the Commission in the May 23 order, the Attorney General asserts that she is hesitant to impose a role on advocates, intervenors, and community organizations to engage and educate customers. She states that:

[d]ifferent organizations have different guiding principles or missions, so their role in engaging and educating customers, should they choose to accept it, would likely be consistent with their purpose. A reasonable assumption is that any organization in this space exists because like-minded people came together because of issues surrounding utilities and affordability. It is likely that there is some level of education and engagement, at least among members that make up the organization and presumably that they do or can educate customers consistent with that. Of course, resources may also play a role in the ability of these organizations to engage and educate customers. So, their ability to have funding and people in place to conduct the education is something that may need outside sources or maybe legislative action.

*Id.*, p. 3. The Attorney General contends that she has implemented several measures to engage with and educate customers, including issuing press releases regarding customer advocacy,

offering a venue through which customers may report outage information, and participating in public meetings and townhall discussions throughout the state.

The Attorney General suggests that:

[t]he Commissioners and/or Commission Staff can reach out to the many diverse and active advocates, intervenors, and community-based organizations in this state and host events where the public can meet and learn how these diverse groups interact at the Commission and learn about how these diverse groups can be a resource for the public to engage in the ratemaking process before the Commission. . . . The Commission should also reach out to other organizations and governmental agencies to bring their knowledge to these townhall meetings, workgroups, and other events. The Environmental Justice Public Advocate, the Utility Consumer Participation Board, and Michigan 211, are some of these organizations and governmental agencies that could assist in engaging and educating customers.

*Id.*, p. 4. In addition, the Attorney General notes that the Staff possesses extensive knowledge of the various utility assistance programs and could be a good resource for customers at these events. Furthermore, she asserts that “the Commission has access to national organizations such as the National Association of Regulatory Utility Commissioners (NARUC) that can help organize or provide assistance to achieve this goal of educating and engaging with customers.” *Id.*

In response to Question 2 posed by the Commission in the May 23 order, the Attorney General asserts that there are “a number of things that the Commission could do to enable effective and efficient participation by intervenors in contested case, some of which already occur either through its initiative or those of parties in contested cases.” *Id.* She states that the Commission already uses workshops and collaboratives to explore specific issues and to gather information about issues that are too complex for a contested case proceeding. To bridge resource and knowledge gaps between intervenors and the utility, the Attorney General suggests that the Commission could consult with NARUC about available educational opportunities to assist intervenors and increase participation. She contends that “while [the Commission] may not conduct training itself, it can

encourage other intervening and community organizations to educate themselves on utility related issues and administrative processes. It can be a source of information for those opportunities for intervenors, especially those new to utility casework.” *Id.*, p. 5.

In response to Question 3 posed by the Commission in the May 23 order, the Attorney General states that public comments are valuable for providing the Commission with a sense of public concern with utility service. However, she asserts that:

[t]he difficulty with public comments is that they do not normally rise to the level of evidence in a contested case hearing on utility matters unless the customer is willing to appear at the hearing and testify under oath. This doesn’t mean that the Commission cannot take into account public comment and act upon it. The Commission Staff can request a utility to respond to public comment received in a docket or from a townhall meeting, if there is a specific issue being raised, and the Commission can consider public comments filed in a docket, giving them appropriate weight and not to resolve a specific factual allegation, in its determination of “just and reasonable” ratemaking.

*Id.*, p. 5 (footnote omitted).

In response to Question 4 posed by the Commission in the May 23 order, the Attorney General contends that “[r]egular townhalls or meetings that are geographically dispersed around the state provides [sic] utility customers and community members the opportunity to provide input to the Commission in a more personal manner than simply submitting electronic comments.” *Id.* She asserts that geographically dispersed public meetings and townhalls allow low-income customers to attend without having to travel long distances. In addition, the Attorney General states that it is also valuable to provide an opportunity for the public to engage with the Commission outside of specific case proceedings.

In response to Question 5 posed by the Commission in the May 23 order, the Attorney General asserts that the best examples of effective methods and metrics to evaluate the responsiveness of the Commission to community needs and priorities is from NARUC. *See, id.*, p. 6. She also states

that establishing a community workgroup that meets regularly or hosting regular townhall meetings will provide the Commission with important and useful information about community needs and priorities. Furthermore, she recommends that the Commission provide information on its website demonstrating how it tracks customer complaints and the time taken to respond.

Soulardarity, UCC, and We Want Green Too (collectively, the frontline community organizations) note that they have engaged in contested cases before the Commission on key issues such as community solar, outage credits, grid equity, utility profitability, emerging technology access, and affordability. The frontline community organizations state that “it is the *results* that ultimately determine whether a *process* has succeeded or failed. Given this, the Commission’s approach to engagement must ultimately fixate on the results.” Frontline community organizations’ September 27, 2024 initial comments, p. 2 (emphasis in original).<sup>2</sup>

The frontline community organizations provide several suggestions. First, they recommend that the Commission perform an annual assessment of frontline community priorities, the Commission’s response to those priorities, and a rationale for the responses, all of which should be made publicly available. In addition, the frontline community organizations assert that the Commission should “[p]ublish an annual reflection on this objective assessment from the Commission outlining its perspective on the gaps between frontline priorities and Commission action.” *Id.*, p. 3. Finally, they state that the Commission should use the assessments recommended above “to audit and align the Commission’s internal operations” with the needs of frontline communities. *Id.*, p. 4.

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<sup>2</sup> The frontline community organizations’ September 27, 2024 initial comments are not paginated. The Commission clarifies that page 1 starts in natural order with the first page of the comments.

### 3. Written Reply Comments

In response to MNSC's request that the Commission amend its rules to allow public comments to be admitted to the evidentiary record, Consumers Energy Company (Consumers) contends that this would violate Michigan law and the company's constitutional rights. Specifically, Consumers asserts that if the Commission were to admit comments as record evidence, it would violate the company's due process rights because Consumers would not have an opportunity to adequately respond to the evidence. *See*, Consumers' October 25, 2024 reply comments, pp. 3-4. In addition, the company argues that "[t]he [Commission] can properly rely on the testimony of a qualified expert and that testimony constitutes competent evidence. Admittance of public comments as record evidence does not rise to the level of expert evidence that is necessary for a decision by the Commission." *Id.*, p. 4 (citing *Attorney General v Pub Serv Comm*, 174 Mich App 161, 170; 435 NW2d 752 (1988)). Furthermore, Consumers states that MNSC's recommendation is contrary to the contested case requirements of the Administrative Procedures Act, Public Act 306 of 1969, MCL 24.201 *et seq.*, and Section 6a of Public Act 3 of 1939, MCL 460.6a, which requires that "interested parties [have] a reasonable opportunity to present and cross-examine evidence." Consumers' October 25, 2024 reply comments, p. 4 (quoting MCL 460.6a(16)(a)). However, Consumers does not object to MNSC's suggestion that intervenors and advocates could sponsor community members as witnesses who could testify on the record and who would be subject to cross-examination.

In response to MNSC's and the CEOs' recommendations for better utility responses to community requests for more public participation, increased utility outreach, and more responsive utility action, Consumers states that it:

already conducts community engagement activities related to its electric, natural gas, and generation filings, and no additional requirements are necessary. The

Company conducted Public Outreach Events associated with its electric rate case filings in Case Nos. U-21389 and U-21585. These outreach events allowed the community to engage with the Company on topics including electric distribution, forestry, generation, service restoration, rate case process, customer assistance, energy waste reduction, and renewable energy. Members of the community were able to provide written and verbal input to the Company on any topic of interest, and the Company reviewed this feedback. The Company also held technical conferences to gather input from [interested persons] on distribution planning and strategy prior to the filing of its Reliability Roadmaps (formerly Electric Distribution Infrastructure Investment Plans) in Case No. U-20147.

*Id.*, pp. 5-6. In addition, the company contends that it conducted public outreach events for its IRP filings in Case Nos. U-20165 and U-21090, which included in-person and virtual participation opportunities, and hosted 20 public meetings across the state to receive public input regarding “the long-term future of the river hydroelectric dams.” *Id.*, p. 6. Furthermore, Consumers asserts that since 2019, it has provided an online comment portal on its website for customers to share thoughts and questions.

Consumers disagrees with the CEOs that a customer’s bill is a beneficial location to share information about proposed rate increases, customer impacts, and instructions for providing public comments in a rate case. Rather, the company asserts that this information is better shared through previously mentioned community engagement methods. Consumers notes that it:

has used targeted Facebook advertisements, email and banner ads on its website to inform customers and community members of these community engagement events. In addition, information is included in the Company’s Rate Case Summary filed in the docket and the [Commission] Notice of Hearing that is mailed to all cities, incorporated villages, townships, and counties and published in daily newspapers of general circulation within its service area.

*Id.*, p. 7.

In response to MNSC’s request that the Commission direct the utilities to identify communities that may be disproportionately affected by the utility’s investment proposal, Consumers states that it “supports a broader focus on Environmental Justice (“EJ”) and Equity and

desires to ensure it is considering those who are most vulnerable to reliability impacts in its distribution planning process.” *Id.*, p. 7. The company notes that it has already identified EJ communities in its rate and IRP cases and used the data “to prioritize distribution investments during its planning process” and to “appropriately consider[] the needs of, and serv[e], its customers in historically disadvantaged communities.” *Id.*, pp. 7-8. Consumers asserts that it will continue to work with interested persons and organizations to appropriately address the issues and interests of EJ communities.

The CEOs express frustration that the investor-owned utilities, such as Consumers and DTE Energy Company, did not submit initial comments. In the CEOs’ opinion, “utilities engage with their customers regularly and should share their experiences and expertise on best practices for engaging the public.” CEOs’ October 25, 2024 written reply comments, p. 1.

The CEOs support the Attorney General’s recommendation that the Commission use NARUC as a resource for public engagement. The CEOs state that “[n]ot only does NARUC already have various training programs and documents to help educate and engage residents, but NARUC also holds many opportunities to train [Commission] Staff, utility employees, and intervenors on public engagement (along with education on rate making, integrated distribution plans, etc.)” *Id.*, p. 2. In addition, the CEOs recommend that the Commission should use its connections to state public service commissions through NARUC to determine if there are additional ways to collaborate with other states.

The CEOs also support the frontline community organizations’ suggestion that the Commission publish annual public reports regarding the disparity between the priorities of frontline communities and the Commission’s actions. The CEOs state that:

[t]hese annual reports should provide the public [sic] information on where the Commission and frontline intervenors align, and where gaps exist in the most

scrutinized cases (such as rate cases, distribution plans, and integrated resource plans). Not only would this provide transparency and build trust in the Commission's decision-making processes, but frontline intervening groups would also be able to better understand how effective their positions are in front of the [Commission]. Finally, this report should list out available resources to help frontline intervenors gain more knowledge on topics relevant to these cases.

*Id.*, pp. 2-3.

Moreover, the CEOs agree with MNSC's recommendation that the Commission's website should be redesigned to provide links to educational materials and information about the UCPB. Specifically, the CEOs state that the website "should include a dashboard that displays the progress of most important, open cases; this can include due dates of scheduled filings, links to provide public comments directly to the case, and intervenors representing the public." *Id.*, p. 3. In addition, the CEOs recommend a Commission scorecard displaying case outcomes, such as the impact of a rate increase or the effect and impact of reduced emissions.

Finally, the CEOs note that the Massachusetts Department of Public Utilities and the Massachusetts Executive Office of Energy and Environmental Affairs created a public involvement plan (PIP) to assist government staff's engagement with the public. The CEOs recommend that the Commission consider the PIP to inform its public engagement process. *See, id.*, pp. 3-4.

### Additional Engagement

The Commission and the Staff have met with local organizations, Tribal and local government representatives, and many others in communities across the state to better understand issues of local concern impacted by areas under the jurisdiction of the Commission. Specifically, over the last several years Commissioners and the Staff have participated in dozens of site visits, public hearings, community meetings, meetings with Tribal leaders, resource fairs, and meetings with community-based organizations in every part of the state, from Detroit, Highland Park, Dearborn,

and Melvindale in Wayne County, to Iron Mountain, Escanaba, L'Anse, Marquette, and Sault Ste Marie in the Upper Peninsula, and from Benton Harbor in Southwest Michigan to Alpena in the Northeast Lower Peninsula, along with South Haven, Grand Rapids, Flint, Jackson, Mt. Pleasant, Gaylord, and many other places in between. The Commission plans to continue these one-on-one and community meetings to foster dialogue with the public and identify additional opportunities for public participation.

Most recently, the Commission hosted a townhall meeting on May 29, 2025, in Detroit, Michigan (May 29 townhall meeting) to discuss options for expanding public participation opportunities in the Commission's decision-making processes. In addition to the three Commissioners, board members from the UCPB and a representative from the Attorney General's Special Litigation Division participated in the May 29 townhall meeting, where they shared an overview of the Commission's decision-making processes, the role of the Special Litigation Division, and information regarding UCPB grant funding for intervenors. A copy of the presentation is available on the Commission's website.<sup>3</sup>

Additionally, based on the work of the Commission in the MI Power Grid Customer Education and Participation workgroup, the Energy Affordability and Accessibility Collaborative's Outreach and Education workgroup, engagement with community-based organizations, and the comments received in this docket, the Commission has developed a set of principles to guide its work related to expanding participatory opportunities. These guiding principles include:

1. Building and maintaining trust with persons and organizations with whom the Commission engages and those who participate in the Commission's processes,

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<sup>3</sup> See, <https://www.michigan.gov/mpsc/commission/events/2025/05/29/detroit-town-hall-meeting> (accessed July 9, 2025).

2. Ensuring transparency, and
3. Increasing Commission visibility and access.

These principles help inform the Commission's efforts to implement the goal of expanding opportunities for informed, meaningful participation by members of the public.

The above principles and an initial outline for a participation framework were shared at the May 29 townhall meeting. Following the presentation, Commissioners and participants from the UCPB and Attorney General's office hosted three breakout groups with the approximately 75 attendees to discuss the principles, the participation framework, and other ideas for improving participatory options. The Commission appreciates the engagement from attendees and notes that it continues to review the many valuable ideas that were shared by those in attendance.

#### Discussion

The Commission thanks the commenters for their input and robust discussion of the topics set forth in the May 23 order and expresses its appreciation for those who participated in the May 29 townhall meeting. This process has provided helpful information and recommendations for areas in which the Commission, the utilities, and interested persons can expand opportunities for public participation in Commission cases and enhance education to help inform the public about the Commission and its role.

One main theme of the comments received in this docket is on additional means and methods for expanded opportunities for informed, meaningful participation with the Commission. To this end, the Commission is working to establish a Community Partner Network (CPN). The mission of the CPN is to build and strengthen relationships between the Commission and communities throughout Michigan. This will be accomplished through meaningful collaboration between community organizations and the Commission's Community Liaisons by jointly identifying

opportunities for impactful and expanded engagement, working together to build an understanding of the Commission's role and how it can help address community needs, and determining whether there are additional or improved methods to publicize public participatory opportunities.

Turning to the Commission's decision-making processes and opportunities for participation within those processes, the Commission notes that its work falls into three categories: quasi-judicial, informal policy-making, and public education. In its quasi-judicial role, the Commission functions similarly to a court, adjudicating contested cases on a variety of utility-related issues, such as rate cases, IRPs, renewable energy plans, among many others. The Commission also requests comment and issues decisions related to policy matters, such as rulemakings, the implementation of legislation, and, in the recent past, policies for responding to the COVID-19 pandemic. Regarding public education, the Commission views this as a two-way dialogue. The Commission works to educate the public and advocacy organizations about the Commission's mission and role in regulating the utilities. However, the Commission, the utilities, and intervening parties in contested cases also receive communication from the public and advocacy organizations regarding issues of concern and suggested methods for improving utility service, communications, and relationships.

With this framework in mind, the Commission notes that there are several ways for interested persons/organizations to get involved and that the Commission has been working to expand these opportunities. In the contested case process, Michigan statutes, rules of evidence, and administrative rules prohibit the Commission from considering public comments as evidence on the record. *See*, MCL 24.272; Michigan Rules of Evidence 801 and 802; Mich Admin R 792.10413. However, the Commission encourages parties to review public comments in

contested cases and to use the comments—if the party considers it to be appropriate—to inform discovery requests and testimony.

Additionally, the Commission plans to implement strategies to increase public awareness regarding the filing of rate cases and other cases that are likely to be of significant public interest, to make it easier for members of the public to identify and connect with intervenors in those cases, and to identify and publicize opportunities for meaningful public comment in these cases consistent with the above discussion. Anticipated strategies include providing notification of case filings and pre-hearing information to the CPN and through the Commission’s social media channels, as well as the creation of a dedicated webpage regarding these cases, their schedules, and approved intervenors.

The Commission notes that on February 13, 2023, Section 6m of Act 231, MCL 460.6m, became effective, which increased the consumer representation fund that is used by the UCPB to advocate for the interests of residential utility customers and for grants to nonprofits representing EJ communities and communities with the highest energy burdens. The Commission finds that this increased funding may be applied for and used by interested persons/organizations to fund formal representation and participation in contested cases, including representation and participation of low-income residential customers, residential customers that experience high energy burdens, and individuals and communities impacted by Commission decisions.

Regarding the role of public comments in informal policymaking, there is a greater opportunity for the Commission to directly consider these comments. As noted above, the Commission conducts proceedings to receive comments and suggestions for establishing and/or improving Commission processes, promulgating rules, and implementing legislation, among other priorities. The Commission finds that to increase the opportunities for meaningful public

participation in informal policymaking cases, the Commission sees value in implementing the suggestions provided by the commenters for improving the Commission's website and social media, providing plain language information about the Commission and open cases, and reviewing the Commission's comment method. Additionally, the Commission intends to take steps to improve public awareness regarding these comment opportunities similar to the strategies discussed above, including providing notification to the CPN and publicizing the opportunities on the Commission's social media channels.

Turning to the Commission's work in public education, the Commission notes the role of its Community Liaisons. The Commission's three Community Liaisons are actively working to develop a network of community partners by building relationships with community-based organizations in all areas of the state to better understand and develop opportunities for community engagement and outreach. The Community Liaisons regularly identify and attend local outreach events where they share information about Commission- and utility-related resources with regulated-utility customers and the public, as well as listen to concerns and suggestions and answer questions. Working with community-based organizations, the Community Liaisons also identify opportunities to provide presentations related to the Commission's work or other utility-related issues of interest. As the Community Liaisons continue to develop relationships with community-based organizations and expand the CPN, opportunities for engagement between community members and the Commission and the Commission Staff will increase.

Furthermore, based on the principles articulated at the May 29 townhall meeting, comments received in this docket, and the Commission's prior work related to customer engagement, the Commission will refine the previously described initial outline for and establish a framework to govern its public participation efforts. The framework will be published on the Commission's

website and will be updated periodically based upon lessons learned and input received from community-based organizations and members of the public who engage with the Commission's participation and engagement efforts.

Finally, the Commission finds that the directives of MCL 460.6aa(2) are complete and, thus, this docket should be closed.

THEREFORE, IT IS ORDERED that the docket in this case is closed.

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 [sheac1@michigan.gov](mailto: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

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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 July 10, 2025.

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Lisa Felice, Executive Secretary

# PROOF OF SERVICE

STATE OF MICHIGAN )

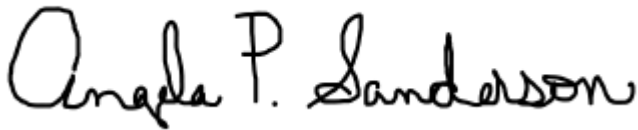
Case No. U-21638

County of Ingham )

Brianna Brown being duly sworn, deposes and says that on July 10, 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 10<sup>th</sup> day of July 2025.



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

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