



Breanne K. Reitzel
(313) 235-9772
breanne.reitzel@dteenergy.com

September 18, 2025

Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 West Saginaw Highway
Lansing, MI 48917

RE: In the matter, on the Commission's own motion, regarding extreme weather condition policies filed in compliance with Michigan Administrative Code R 460.134.
MPSC Case No. U-20140

Dear Ms. Felice:

Attached for electronic filing in the above captioned matter are DTE Electric Company's and DTE Gas Company's Comments in response to the Michigan Public Service Commission's August 7, 2025 Order.

Very truly yours,

Breanne K. Reitzel

BKR/cdm
Attachment

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter, on the Commission’s own)	
motion, to process extreme weather condition)	
policies filed in compliance with Mich Admin)	Case No. U-20140
Code, R 460.134 for approval.)	
_____)	

COMMENTS OF DTE ELECTRIC COMPANY AND DTE GAS COMPANY

I. BACKGROUND

On April 12, 2018, the Commission issued an order opening this docket directing each regulated electric and natural gas utility to file an extreme weather condition policy in this docket by June 11, 2018 (later revised to July 13, 2018). The requirement for filing these policies resulted from the promulgation of Mich Admin Code, R 460.134 (Rule 34) of the Commission’s Consumer Standards and Billing Practices for Electric and Natural Gas Service.

As stated in Rule 34, these extreme weather condition policies involve suspending disconnection of utility service to customers during extremely hot and extremely cold weather. After reviewing the filings, the Commission issued an order in this docket on August 28, 2018, approving the extreme weather condition policies filed by the regulated electric and natural gas utilities (“August 28 Order”). The August 28 Order also directed any regulated electric or natural gas utility that seeks to change its approved extreme weather condition policy in the future to timely file its proposed amendments in this docket for further review and approval in accordance with Rule 34(2). No policy amendments have been proposed for approval since the initial July 13, 2018 deadline.

In an order issued August 7, 2025, the Commission found that the existing extreme weather condition policies should be reviewed. In this order, the Commission seeks input from interested parties on the following topics:

1. The existing extreme weather condition policies vary by utility, with some suspending disconnections at a temperature threshold and others using National Weather Service (NWS) heat and cold advisory warnings. Are each utility's extreme weather condition policies appropriate for setting shutoff and customer protections? If not, what other thresholds should be considered? What is the most appropriate threshold for utilities in Michigan?
2. Should the extreme weather condition policies be consistent across utilities or continue to vary by utility?
3. How long should protections be in place after an extreme weather event? For example, should utilities be prohibited from instituting shutoffs for 72 hours after the event if the high/low temperature threshold or NWS heat/cold advisory warning is forecasted for any time in the 48 hours following the event?
4. What protections do other states with similar climates have in place during extreme weather that the Commission should consider? How effective are they? What extreme weather thresholds are used?
5. What process improvements might be considered for extreme weather condition policies?
6. Should utilities provide more data or file reports on a regular basis related to extreme weather condition policies? If so, how often and what should be included? What purpose would the reports serve?
7. Should the extreme weather condition policies be updated or evaluated on a specific timeline, to ensure they remain effective and responsive to changing weather patterns and emerging challenges? Or should another trigger (other than time) be used for the update or reevaluation?
8. If applicable, what public engagement process should utilities utilize to update their respective extreme weather condition policies?
9. Should utilities be required to notify the Commission when their extreme weather protections are triggered?
10. What assistance measures are utilities providing to customers during extreme weather (e.g., information on cooling/heating centers and resilience hubs, pallets of water bottles, etc.)? How is this assistance communicated to customers? What other entities are utilities coordinating with? Are there additional assistance measures that should be considered?
11. What else should utilities and the Commission consider when reviewing and updating the extreme weather condition policies?

II. COMMENTS

DTE Electric Company and DTE Gas Company (“DTE” or the “Companies”) jointly provide the following comments on issues raised in the Commission’s order.

- 1. The existing extreme weather condition policies vary by utility, with some suspending disconnections at a temperature threshold and others using National Weather Service (NWS) heat and cold advisory warnings. Are each utility’s extreme weather condition policies appropriate for setting shutoff and customer protections? If not, what other thresholds should be considered? What is the most appropriate threshold for utilities in Michigan?**

Response:

DTE’s disconnect suspension policy offers a clear, data-driven framework and is appropriate for setting shutoff and customer protections. DTE monitors daily forecasts from weather.com and suspends disconnections when:

- Highs are forecasted to reach 90°F or above for two consecutive days
- Lows are forecasted to reach 15°F or below for two consecutive days
- Wind chills are forecasted to fall below 0°F for two consecutive days

This policy is applied individually across seven Michigan regions and monitored daily to ensure timely implementation should the policy need to be activated.

DTE’s clear and consistent methodology around suspending disconnects has a proven track-record of protecting customers while balancing operational feasibility through a simplistic straightforward approach.

A statewide framework that uses objective thresholds, like DTE’s shown above, would improve consistency among utilities.

- 2. Should the extreme weather condition policies be consistent across utilities or continue to vary by utility?**

Response:

As stated in the previous response, a statewide framework like DTE’s would improve consistency of application. DTE uses one policy and one set of procedures and metrics across its service territory and seven regions.

Even though there are different climates with variances in weather forecasts, one policy applies to all. Below is an example where Detroit would trigger the Extreme Weather Policy and two other regions (Alpena and Iron Mountain) do not.

ALPENA				DETROIT				IRON MOUNTAIN			
Date	High Prediction	Wind Speed Prediction	Windchill Prediction	Date	High Prediction	Wind Speed Prediction	Windchill Prediction	Date	High Prediction	Wind Speed Prediction	Windchill Prediction
1	80		85	1	86		89	1	84		88
2	83		87	2	87		90	2	82		87
3	76		83	3	86		89	3	82		87
4	75		82	4	87		90	4	87		90
5	90		92	5	93		94	5	86		89
6	74		82	6	91		92	6	78		84
7	74		82	7	81		86	7	78		84
8	74		82	8	83		87	8	74		82

- How long should protections be in place after an extreme weather event? For example, should utilities be prohibited from instituting shutoffs for 72 hours after the event if the high/low temperature threshold or NWS heat/cold advisory warning is forecasted for any time in the 48 hours following the event?

Response:

DTE is a strong advocate of protecting our customers during extreme weather events, such as those outlined in our disconnect suspension policy above. However, once the extreme event has passed normal operations should resume the following business day as customer health would no longer be a concern.

While customer protections during extreme weather events are critical, extended pauses in disconnection activity—such as a mandatory 72-hour delay following an event—may unintentionally disrupt utility billing operations and contribute to the accumulation of arrears after the weather event has subsided.

- What protections do other states with similar climates have in place during extreme weather that the Commission should consider? How effective are they? What extreme weather thresholds are used?

Response:

Benchmarking with key Midwestern states with similar weather patterns and customer demographics would be very informative in shaping Michigan’s disconnect suspension policies. A thorough review of these state policies along with a weighing of the pros and cons of each and that of the existing utility policies would provide for an informed decision to best support the State.

5. What process improvements might be considered for extreme weather condition policies?

Response:

DTE believes that its current extreme weather condition policy effectively supports public safety. The policy is based on clear, forecast-driven criteria and is applied consistently across seven regions in Michigan.

Disconnections are suspended when:

- Forecasted high temperatures reach 90°F or above for two consecutive days
- Forecasted low temperatures fall to 15°F or below for two consecutive days
- Forecasted wind chills drop below 0°F for two consecutive days

These thresholds are monitored daily using publicly available data from weather.com. This proactive approach allows DTE to adjust field operations, contact center capacity, and customer outreach in advance of extreme weather events.

DTE supports continued dialogue with the Commission and other stakeholders to explore process improvements that balance customer safety, operational feasibility, and regulatory alignment.

6. Should utilities provide more data or file reports on a regular basis related to extreme weather condition policies? If so, how often and what should be included? What purpose would the reports serve?

Response:

The U-20757 docket is a key regulatory mechanism established by the Michigan Public Service Commission (MPSC) to monitor utility disconnections and arrearages. Under this directive, DTE and other utilities are already required to submit monthly and quarterly reports detailing customer service data, including disconnections due to nonpayment, restoration activity, and arrearage levels. This reporting also includes activity due to extreme weather policy activation.

7. Should the extreme weather condition policies be updated or evaluated on a specific timeline, to ensure they remain effective and responsive to changing weather patterns and emerging challenges? Or should another trigger (other than time) be used for the update or reevaluation?

Response:

Yes. Regular evaluation of extreme weather condition policies is essential to ensure they remain effective, equitable, and responsive to evolving climate realities and technological advancements.

- 8. If applicable, what public engagement process should utilities utilize to update their respective extreme weather condition policies?**

Response:

The EAAC (Energy Affordability and Accessibility Collaborative) could be leveraged for this process, as it is already designed to bring together stakeholders from across the spectrum (utilities, regulators, consumer advocates, and community organizations) it's well-positioned to facilitate dialogue, make policy recommendations, and support implementation planning.

- 9. Should utilities be required to notify the Commission when their extreme weather protections are triggered?**

Response:

As mentioned above, the U-20757 docket includes reporting on extreme weather policy activation.

- 10. What assistance measures are utilities providing to customers during extreme weather (e.g. information on cooling/heating centers and resilience hubs, pallets of water bottles, etc.)? How is this assistance communicated to customers? What other entities are utilities coordinating with? Are there additional assistance measures that should be considered?**

Response:

When extreme weather conditions trigger DTE's policy, the utility activates a suite of customer-focused assistance measures designed to protect vulnerable populations and maintain service continuity. These include:

- **Distribution of Emergency Supplies**
 - In cases of prolonged outages or heat waves, DTE coordinates the distribution of bottled water, fans and generators to affected communities.
 - These efforts are often done in partnership with local emergency management agencies and community organizations.

- **Communication Channels**
 - Social media updates
 - Local news outlets
 - Direct outreach (text, emails, automated calls)
 - Website postings with real-time outage maps and safety tips

- 11. What else should utilities and the Commission consider when reviewing and updating the extreme weather condition policies?**

Response:

DTE has implemented a simplistic and effective approach to our disconnect suspension policy that balances the needs of all of our customers with the operational requirements of the utility company. We appreciate the opportunity to weigh in on this critical body of work and are looking forward to further engagement on this topic.