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THE LAW SCHOOL
Abrams Environmental
Law Clinic

September 30, 2025

Via E-Filing

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

RE: MPSC Case No. U-21870

Dear Ms. Felice:

Please find enclosed the Accompanying Exhibits UCC-38 to UCC-51 for the Direct Testimony of Sergio Cira-Reyes on Behalf of Urban Core Collective (Part 4 of 6), along with proof of service, for electronic filing in the above-referenced matter.

Please do not hesitate to contact my office with any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark N. Templeton".

Mark N. Templeton, *pro hac vice*
6020 S. University Avenue
Chicago, IL 60637
Phone: (773) 702-9611
Email: templeton@uchicago.edu

xc: Parties to Case No. U-21870



May 1, 2025

Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 West Saginaw Highway
Post Office Box 30221
Lansing, MI 48909

Re: Case No. U-21021: In the matter of the application of Consumers Energy Company for approval of a Percent of Income Payment Plan Pilot.

Dear Ms. Felice:

Enclosed for electronic filing is **Consumers Energy Company's Percentage of Income Payment Plan Pilot Program Report** in the above-captioned case. This is a paperless filing and is therefore being filed only in a PDF format. I have included a Proof of Service showing electronic service upon the parties to Attachment 1.

Sincerely,

Digitally signed by Anne M. Uitvlugt
Date: 2025.05.01 14:09:22 -04'00'

Anne M. Uitvlugt

cc: Anne Armstrong, MPSC Staff

Consumers Energy
PIPP Pilot Program
(Percentage of Income Payment Plan)

May 1, 2025



CMS ENERGY



Consumers Energy

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Consumers Energy PIPP Program Report out to MPSC

Report Outline

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Consumers Energy PIPP Program Report out to MPSC

Executive Summary

Consumers Energy Company (Consumers Energy or CE or the Company) is dedicated to Michigan residents, offering convenient access to energy assistance programs that address their affordability needs. The partnerships with organizations such as 211, Michigan Department of Health and Human Services (MDHHS or DHHS), Michigan Public Service Commission (MPSC or the Commission), and Community Action Agencies (CAAs) equip customers with tools for long-term success and ensure they receive essential support during difficult periods.

The Consumers Energy team is dedicated to allowing customers to choose how they interact and communicate with the Company through their preferred channels. Continuous evaluation of program offerings ensures that customer affordability and assistance remain central to program design.

As part of an ongoing commitment to better serve vulnerable customers, Consumers Energy filed an application for ex parte approval of a Percentage of Income Payment Plan (PIPP) pilot for natural gas and combination customers on March 9, 2021 in Case No. U-21021. The Company revised its application in a December 3, 2021 filing to include electric customers. The Commission issued an order on February 10, 2022 in Case No. U-21021 approving the Company's amended application for a PIPP pilot for both electric and natural gas services. The Company implemented and evaluated a PIPP pilot exploring additional ways to support households under 150% of the Federal Poverty Level (FPL). Over the course of the two-year pilot, several data points were measured, as reflected in this report. The primary observation was that the success metrics of the program were almost identical between the PIPP and the

Consumers Energy PIPP Program Report out to MPSC

Affordable Payment Plans (APPs), which include the Consumers Affordable Resource for Energy (CARE) program, and the newly modified CARE Modified Budget (CARE MB) program.

Although the program metrics were comparable to those of existing APPs, the cost of maintaining PIPP would be substantially higher. This increase in cost would be particularly pronounced if PIPP were extended to all active low-income customers. An active customer is defined as one who has participated in an income-qualified payment assistance program within the past 12 months.

The analysis determined that low-income customers are both successful and satisfied with the existing CARE programs, which are supported by the Michigan Energy Assistance Program (MEAP). New Legislation and significant work have been accomplished in partnership with state law makers, MPSC, CAAs, and utilities across Michigan aimed at reforming MEAP to expand eligibility and funding.

Considering all the cross-functional efforts to enhance MEAP and maintain a consistent customer experience, while also reducing customer confusion by modifying historic program designs, Consumers Energy recommends continuing with the existing MEAP and its current APP, CARE MB, to fully realize the benefits of the reform.

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1. Summary of the Rate Case and *Ex Parte* Case that Created PIPP Pilot

On September 10, 2020, the MPSC issued an order in Case No. U-20650 approving a settlement agreement filed by Consumers Energy to increase rates, amend its rate schedules, obtain approval of certain accounting matters, and modify certain terms and conditions of providing natural gas service. Provision 19¹ of this settlement agreement required Consumers Energy to explore the structure of a low-income PIPP pilot, with the assistance of MPSC staff and interested stakeholders. The team developed a PIPP pilot proposal for customers at and below 150% of the FPL to pay no more than 6% of their household income for dual commodity and 3% of their household income for single commodity customers. The proposal outlined the number of enrolled customers, methods of financing the pilot and verifying household income, and the approach to determine eligible customers.

On December 17, 2020, the Commission issued an order in Case No. U-20697² authorizing the Company to increase rates for the sale and distribution of electric energy and for other relief, as set forth in the order. Given the Company's ongoing efforts to develop a PIPP pilot for its natural gas service, the Commission directed Consumers Energy to develop a PIPP pilot for its electric service.

Consumers Energy filed an application for *ex parte* approval of a PIPP pilot for natural gas and combination customers on March 9, 2021 in Case No. U-21021. The Company revised its application in a December 3, 2021 filing to include electric customers. The application summarized collaboratives that were conducted with interested stakeholders. Participants

¹ U-20650, pg. 6

² U-20697, pg. 335

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included MPSC staff, representatives from the Attorney General's Office, intervenors in the Company's recent gas rate case, and non-profit agencies. The filing included pilot details such as timeline, quantity of enrolled customers, means of choosing eligible customers and verifying household income, pilot structure, participation in energy waste reduction (EWR) programs, de-enrollment, metrics, and financing. The Commission issued an order on February 10, 2022 in Case No. U-21021 approving the Company's amended application for a PIPP pilot for both electric and natural gas service. The MPSC announced the PIPP pilot on February 3, 2022.³

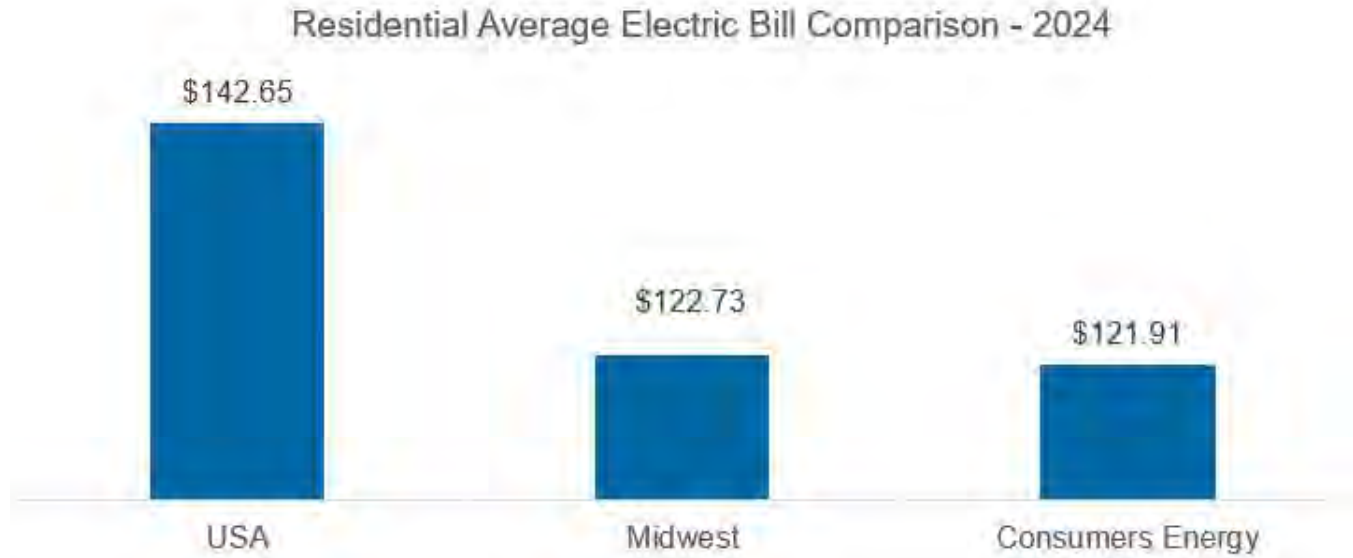
³ Appendix A: Press Release, pg. 85

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2. Summary of Consumers Energy's Energy Assistance Offerings

The Company knows that every penny counts for its residential customers, and residential electric bills are now lower than both the Midwest and U.S. average. As displayed in Figure 1, Consumers Energy's total average residential bill is around \$121.91, better than \$122.73 for the Midwest, and \$142.65 for the U.S.

Figure 1: Average Residential Electric Bill Comparison (2024)



Source: EIA (U.S. Energy Information Administration)

Despite our efforts to keep energy bills low, the Company acknowledges the necessity of offering payment assistance to those in need. The Company offers a range of energy assistance and payment programs designed to meet the diverse needs of its customers. Consumers Energy's natural gas and electric customers have access to several payment plans and energy assistance programs, as illustrated later in the report in Figures 2 and 3 which includes PIPP for comparison. These programs provide different tiers of support to help

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customers manage their energy costs. Whether customers are looking to manage their energy usage and costs more effectively or are in active crisis, the Company aims to provide comprehensive assistance that addresses both short-term and long-term energy management.

Energy assistance programs are funded through various sources, including state and federal funding and Company gift contributions. Enrollment, program management, and data tracking are overseen by different entities, such as the MPSC, CAAs, United Way, The Salvation Army, etc., and the utility itself. The agencies work individually with the customer to evaluate needs, present program options and allow the customer to decide which program best fits their needs. Consumers Energy does not directly validate income or gather household and income data from customers. As a result, the Company does not have an accurate method for calculating customers' energy burden. Instead, this responsibility is assigned to the agencies, which maintain customer relationships to provide the intended support.

MEAP provides a statewide program to deliver energy assistance and self-sufficiency services to eligible low-income residential households. Consumers Energy and other Michigan utilities partner with nine MEAP agencies around the state to enroll customers in MEAP. The program is funded by both state and federal dollars. The MEAP dollars are collected through the Low-Income Energy Assistance Fund (LIEAF) surcharge, a non-bypassable monthly surcharge on electric customers' bills that funds MEAP, providing for energy expenses and arrears forgiveness. MEAP participants may choose to enroll into an APP or receive one-time assistance credit. Customers are encouraged to utilize EWR services, such as enrolling in a Home Energy Analysis (HEA) or other measures, to optimize energy efficiency while enrolled in a MEAP plan. In addition to bill payment assistance, MEAP providers must offer Assurance

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16 self-sufficiency services, which assist participants with the following: budgeting courses, counseling, and assistance with energy vendors.

The Company is committed to educating and informing customers about their options through a variety of initiatives. Recently, the Company established various cross-departmental Low to Moderate Customer initiatives, focusing on topics such as process problem solving, connecting low-income customers to EWR, geotargeted community outreach⁴, and digital website improvements. These working groups included team members from Customer Experience, Customer Operations, Digital Customer Experience, Products, and Marketing. The Company engages in dedicated grassroots community outreach, described below, to connect with customers directly. It also provides customized communications tailored to senior and vulnerable populations, ensuring they receive the information they need in an accessible manner. Additionally, the Company offers comprehensive online resources on its website--including energy-savings tips and energy efficiency solutions--and utilize various communication platforms to reach customers on their preferred channels, such as email, mailers, social media, etc. Consumers Energy's goal is to ensure that every customer is well-informed and supported, regardless of their situation or preferred method of communication.

⁴ Appendix H: Community Outreach (Customer Pop-Ups), pg. 189

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Figure 2: Energy Assistance Payment Plans

Energy Assistance Payment Plans			
Plan Name	CARE	CARE MB	PIPP Pilot
Program Description	CARE – Replaced by CARE MB	CARE Program Modified – Full Launch 10/2024	Percentage of Income Payment Pilot
Funding Source	Michigan Energy Assistance Program (MEAP)	Michigan Energy Assistance Program (MEAP)	Company Funded
FPL Eligibility/Criteria	≤ 150%	≤ 150%	≤ 150%
Arrears Cap to Enroll	\$4,000	None	\$6,000
Consumption Cap	None	None	None
Approved SER	Required	Required	Not Required
Arrears Forgiveness	Frozen at the time of enrollment and 1/24 th forgiven each month while enrolled	*1 st arrears payment of up to \$600 within first 30 days of enrollment. *2 nd arrears payment of up to \$600 at 12 months. *3 rd and final arrears payment of up to \$1800 at the completion of the plan. A total of up to \$3000 forgiven	Frozen at the time of enrollment and 1/24 th forgiven each month while enrolled
Gap Payment	Credit applied to offset difference from plan amount and actual consumption	Monthly credit based on FPL (%) and level to bridge gap from customer payment and usage	Credit applied to offset difference from plan amount and actual consumption
Term of Plan	24 Months	24 Months	24 Months
Payment Plan Amount	Based on FPL (%) and established by agency at the beginning of the program	Based on customer FPL (%) and average consumption and established by agency at the beginning of the program. Customer payment amount is adjusted every 6 months based on consumption/usage.	Payment amount based on customer (%) of income determined by agency. Plan amount is established by agency.
Arrears Required	Yes	Yes	No
Annual Revalidation	None	None	No
EWR Offered	Yes	Yes	Yes

*CARE MB was fully launched in October 2024 and the PIPP closed January 2025.

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Figure 3: Energy Assistance Programs

Energy Assistance Programs						
Program Name	LIA	RIA	Green Giving	State Emergency Relief (SER)	Home Heating Credit (HHC)	MEAP One Time Assist (OTA)
Program Description	Low Income Assistance Credit	Residential Income Assistance	Monthly Credit from Renewable Energy Savings	Low-Income	Low-Income	Low-Income
Funding Source	Rates	Rates	Renewables	Federal Grant – Low Income Home Energy Assistance Program (LIHEAP)	Federal Grant – Low Income Home Energy Assistance Program (LIHEAP)	Michigan Energy Assistance Program (MEAP)
FPL Eligibility/ Criteria	≤ 150%	≤ 150%	≤ 200%	≤ 150%	≤ 110%	≤ 150%
Approved SER	Not Required	Not Required	Not Required	N/A	N/A	Not Required
Gap Payment	None	None	Monthly Billing Credits of \$10-\$20 Per Month	Bill credit, amounts vary based on need up to cap	Varies by customer. Average credit is \$250	Bill credit, amounts vary based on need up to cap
Term of Program	12 Months	12 Months	12 Months	N/A	Annual	N/A
Payment Plan Amount	Monthly Billing Credits	Monthly Billing Credits	Monthly Billing Credits	N/A	N/A	N/A
Arrears Required	No	No	No	No	No	No
Annual Revalidation	Yes	Yes	Yes	Yes	Yes	Yes

Grassroots Outreach: Consumers Energy’s grassroots outreach aims to establish partnerships with nonprofit and municipal organizations that serve low to moderate income (LMI) populations in various capacities, beyond just payment assistance for utility bills. By equipping these organizations with the necessary knowledge, tools, and contacts to effectively address their clients’ unique energy assistance needs, the Company’s most vulnerable

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customers gain better access to personalized care through trusted community organizations such as Area Agencies on Aging, community health organizations, social service organizations, community coalitions on housing, religious ministries, and other organizations serving clients in need. The Company provides training for caseworkers, call center staff, and organizational leadership on the available client assistance programs and offers a direct Company contact to resolve issues that fall outside the traditional scope. Additionally, the Company's presence at community events allows it to directly engage with customers about assistance programs and offer personalized solutions on-site.

Senior Citizen Outreach: Consumers Energy stands ready to assist by connecting customers aged 65 and older with energy saving strategies and payment resources to help them pay their heating costs. During the month of March, as seniors come off winter shut-off protection, Consumers Energy proactively reaches out to eligible senior citizens with an opportunity to schedule a Senior Check-in. The Company identifies senior customers that have an outstanding balance that may be in jeopardy of service disconnection following the end of the shut-off moratorium in March. During the check-in, a customer service representative will review seniors' accounts and offer personalized payment assistance options to get them back in control of their energy bills in advance of the end of winter protection.

Education and Outreach: As part of its ongoing commitment to transparency and providing optimal program advice and options, the Consumers Energy Assistance team continually revises communication materials and disseminates new programmatic updates, as changes are frequently made to the energy assistance landscape causing confusion amongst

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customers in need. The team offers clear calls to action and key educational information about programs, including average savings, eligibility requirements, and enrollment assistance.

The Company regularly communicates to low-income residential customers through various platforms, such as resources on an energy assistance website, email, mail, robo-calls, social media, blog posts, flyers, press releases, interviews, and radio announcements, to ensure customers are informed about different options and plans that may benefit them and keep them safe. Historically, the Company has collaborated with MEAP partners to deliver co-branded messaging to customers from both the agency and utility.

To better understand customers, empathize with their situations, and effectively respond to their preferred contact methods and sentiments regarding their energy bills, the Customer Experience team has developed detailed Low Income Customer Profiles⁵. These personas were developed as a design tool and customer accounts. Customer accounts in the Company's system do not have any indicators such as notes, comments or tags, which associate the account holder with any of the customer profiles we have established. These tools help the Company evaluate current customer experience (products, end-to-end services, etc.) and ideate. The percentage of customers assigned to each customer profile are estimates to help the Company inform high-level strategic direction and help to answer questions around marketing, messaging, program and product prioritization and areas of opportunity. The Company's low-income flag, census data and third-party research were all used to validate the breakdown of percentage of our customers in each persona type. These personas have enabled the Customer Experience team to engage more thoughtfully with vulnerable

⁵ Appendix I: Customer Personas, pg. 192

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customers, developing empathy and used as a story telling tool. While every customer situation is unique, these personas were intended to include common themes or scenarios that customers may take on. Some customers may identify with many depending on their situation. By considering customers' feelings, motivations, barriers, and position in the shut-off timeline, the Energy Assistance team can tailor communications more effectively.

To ensure customers receive the most relevant information, the team customizes creative material based on whether a customer has previously enrolled in the program. This approach helps to avoid overwhelming those who are already familiar with the process. The team offers some communications in English, Spanish, and Arabic.

Additionally, the team conducts an annual digital review of the energy assistance website, focusing on language accessibility, low literacy considerations, Web Content Accessibility Guidelines (WCAG) compliance, and ease of navigation.

Finally, all Consumers Energy Customer Service Representatives (CSRs) receive regular training and updates on energy assistance programs. The Company uses an information database called the Service Now Advocate portal (SNAP), a resource CSRs can reference when trouble shooting individual customer need. Tools, reference guides, and model statements are all included for CSRs to reference. One article in SNAP specifically outlines the 'Inability to Pay' process⁶ and directs CSRs on how to most effectively help customers in need of assistance. This ensures that customers seeking energy assistance can speak with knowledgeable representatives who can provide the right solutions.

⁶ Appendix I: Inability to Pay process, pg. 190

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3. Best Practices in Energy Affordability that Informed the PIPP Pilot

Consumers Energy conducted research-based analysis by benchmarking PIPP programs offered by four similarly sized utilities across three states. The analysis focused on several key areas and is summarized below (Figure 4).

Income Validation: Utilities offering PIPPs or PIPP pilots were surveyed regarding their methods for income and eligibility validation. Three of the four utilities indicated that CAAs performed income validation for customers, with eligibility set at or below 150% of the FPL. One utility independently provided this service with skilled utility employees performing income validation, accepting customers with incomes at or below 200% of the FPL.

Financing: Most programs are funded through a universal service rider, which collects a fee from utility customers, referred to as a “rider” to support the program for eligible participants. A ‘rider’ is a term which denotes an individual line item on a customer’s bill, similar to the LIEAF funding factor surcharge used in Michigan to support MEAP. Duke Energy Ohio (Duke or Duke Energy) uses this model. Their rider is included in customer rates and the monthly funds collected are sent to the Ohio Department of Development to be held/administered by the state in a Universal Service Fund.

The state of Ohio commits to fully compensating the utility for the net difference between the program’s costs and recoveries from the rider. In simple terms, gas and electric customers are charged a fee on their monthly bills to help fund the costs of the PIPP program. Any costs not covered by this fund are paid for by the state of Ohio. Duke Energy remits the monthly dollars collected for the Universal Service Rider and calculates the remittance owed to the utility for the cost of PIPP, which is paid back monthly by the Ohio Department of Development.

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Following initial benchmarking, Consumers Energy completed further comparison with Duke Energy to determine program design and financial structure. Duke Energy's PIPP cost per customer is on average \$1,546/year (after Home Energy Assistance Program⁷ (HEAP) payment is applied to the customers main energy heating account). The average benefit payment in the state of Ohio is \$262 per household for all uses.

Customer Benefit: Various payment obligation scenarios were identified. In Pennsylvania, payment percentage obligations varied by utility, ranging from 3% to 17% of the customer's income. Duke Energy reported that customers pay 6% for single commodities and 12% for combined commodities, while Columbia Gas of Ohio requires customers to pay 6% of their total income. PIPP pilots for both Duke Energy and DTE Energy (DTE) offer an on-time payment bonus, equivalent to one month's customer payment obligation, credited at the end of the 12-month period. Duke noted that this process can be administratively burdensome. This is due to the manual work needed to identify the accounts that would be eligible for this credit. A minimum payment amount of \$10 was common among the benchmarked utilities. Additionally, Duke Energy established a dedicated phone line and trained call center agents to assist customers for PIPP which promoted long-term program success. The Company's additional research incorporated data from reputable sources, including the Low Income Home Energy Assistance Program (LIHEAP) Clearinghouse, the Pennsylvania Public Service Commission, Columbia Gas, and Duke Energy. Additionally, reference was taken from American Council for an Energy-Efficient Economy (ACEEE) and Applied Public Policy Research Institute for Study and Evaluation (APPRISE). They define high energy burdens as

⁷ <https://liheappm.acf.hhs.gov/datawarehouse>

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those exceeding 6% of income, while severe energy burdens are those surpassing 10% of income.

Arrears: Arrears forgiveness was commonly granted for customers who made on-time payments. All benchmarked utilities forgave arrears monthly throughout the program's duration. While some arrearage caps ranged from \$1,500 to \$6,000 for program entry, others did not have an arrearage cap but are considering one for future program iterations.

Weatherization: All benchmarked utilities require customer referrals to weatherization services, with mandatory participation in two of the utilities. Services included home energy audits, efficiency improvements, and educational coaching on the long-term benefits of sustainability.

Figure 4: PIPP Program Benchmarking

Company/State	Income Verification	Financing	Benefit	Arrears	Weatherization	Metrics
Columbia Gas (Ohio)	Performed by Ohio Self Determination Association and must be at or below 150% FPL.	Costs recoverable through rider.	Customer pays 6% of household income and minimum of \$10.	Forgiven over 24 months with on-time payments.	Must contact weatherization program but not required to participate.	Managed and determined by the state.
Duke Energy (Ohio)	Performed by Community Action Agency and must be at or below 175% FPL.	Costs recoverable through rider.	Customer pays 6% gas, 6% electric, 10% electric heat, 12% combo.	On time payment, the utility covers the gap. If late, adds to arrears & recalculated 1x/yr.	Must contact weatherization program but not required to participate.	Managed and determined by the state.
Pennsylvania	Performed by agency & must be at or below 150% FPL.	Costs recoverable through rider.	Variable by Utility. 3-17% of income options. Budget bill options.	Arrears forgiven over 12-36 months.	Weatherization required only if eligible.	PA Utility Commission must ensure that the utilities run programs in a cost-effective manner.
DTE Energy (Pilot)	Performed by Utility & must be at or below 200% FPL.	Costs recoverable.	Customer pays 6% for single service and 10% for combo.	Arrears cap <\$1,500 and forgiven over 24 months.	EWR Education Services offered to participants.	Managed and determined by the state.

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4. Structure of Consumers Energy's PIPP Pilot

The PIPP program was established to provide affordable payment options based on customers' income levels. This 24-month pilot program launched in October 2022 at Consumers Energy, with enrollment concluding in February 2023. Two of the enrolling MEAP providers, United Way of South-Central Michigan (UWSCMI) and TrueNorth Community Services (TN or TrueNorth) were selected to enroll customers in PIPP. The Company monitored the spend down of available funds based on arrears at the time of enrollment, leaning on the side of conservatism with unknown elements such as weather. Continuous monitoring of the data program during the open enrollment timeframe provided these insights. Total anticipated enrollment numbers decreased because of this monitoring. The final participants graduated from the program in February 2025. Customers are eligible for the program if their income is at or below 150% of FPL. Eligible participants include residential electric, natural gas, or combination customers, provided there is no unaddressed theft or fraud on their account (Figure 5).

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Figure 5: PIPP Overview

Percentage of Income – 24 Month Payment Program Overview		
Utility Commodity	Plan Amount % of Gross Income	Min. Monthly Payment
Single (Gas or Electric)	3%	\$10
Combo (Gas & Electric)	6%	\$10
Agency Partners		
<ul style="list-style-type: none"> • TrueNorth and United Way of South-Central Michigan 		
Eligibility		
<ul style="list-style-type: none"> • Federal Poverty Level ≤ 150% • \$6k Credit Cap over 2 years 		<ul style="list-style-type: none"> • \$6k Arrears Cap
Arrears Forgiveness		
<ul style="list-style-type: none"> • 1/24th of starting arrears forgiven monthly • No Special offering for On-Time payments 		
Missed Payments		
<ul style="list-style-type: none"> • Program default processes begins when past due is equal to 2 monthly payments 		
Energy Waste Reduction (EWR) Enrollment		
<ul style="list-style-type: none"> • Enrollees are encouraged to participate in EWR • Education and Assistance provided for Home Energy Audit scheduling and other waste reduction opportunities 		

Payments and Arrears: CE's PIPP customer payments are based on a percentage of their income, as determined by the designated MEAP agency: 3% for single commodity customers, and 6% for combination customers. The minimum payment is set at \$10. As previously mentioned, the payment is based on research from ACEEE⁸ and APPRISE. They define high energy burdens as those exceeding 6% of income. Customers receive a bill that clearly outlines PIPP Pilot program charges and provides a detailed breakdown of their account balance, explaining how arrears and payments are managed. There are no bonuses for timely payments, aside from shutoff protection, exemption of late payment charges, and arrears forgiveness as part of being enrolled in the program and paying on time. Arrears are forgiven over the two-year program with a cap of \$6,000. There is no specific cap on consumption or usage for program enrollment. Arrears payments are divided over the 24-month duration of the

⁸ <https://www.aceee.org/sites/default/files/energy-affordability.pdf>

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program. TN used the Arizona Self Sufficiency Matrix to determine eligibility but did not specifically calculate energy burden as an independent analysis. UWSCMI used the APP Decision Matrix, to calculate energy burden. UWSCMI put the estimated 12-month usage in as one of the formulas (collected using Consumers Energy's agency portal CE PASS). This would be used to calculate the estimated payments for PIPP. TN also used CE PASS, entering the household's income and size to generate payment amount. Customers are removed from the program after missing two consecutive monthly payments. To keep customers well-informed and supported throughout the process, and to provide timely warnings about potential program defaults, the Company proactively reaches out to PIPP customers via mail. This process is similar to how outreach is performed for CARE customers. Upon the first missed payment⁹, a notification is sent via mail to inform customers and encourage them to contact their agency to explore alternative options. If a second monthly payment is missed, customers receive an additional communication¹⁰ by mail outlining the amount due and the deadline for payment to maintain their enrollment in the program. This communication also advises customers to reach out to either their agency or Consumers Energy for further assistance. Should no action be taken by the specified date in the second communication, the customer receives a final letter.¹¹ Efforts were made by Consumers Energy to notify the agencies of customers that were at risk of program de-enrollment, with the intent of agency intervention. In the event required payments are not made, resulting in program de-enrollment, the customer is placed in the Consumers Energy standard collections process. Although customers have the option to enroll in proactive billing and payment alerts, which inform the customer of their due dates in

⁹ Appendix D: PIPP 1st Missed Payment Notice, pg. 102

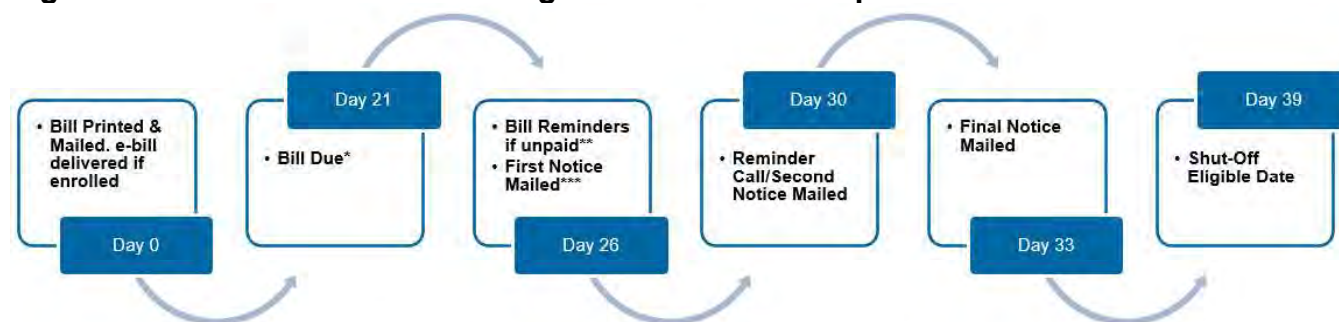
¹⁰ Appendix D: PIPP 2nd Missed Payment Notice, pg. 103

¹¹ Appendix D: PIPP De-enrollment Letter, pg. 104

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advance, a customer typically does not receive late payment communication until five days after the bill due date. The customer would incur a 2% late payment charge once the bill is 6 days past due. A minimum of four reminder communications are sent to the customer by mail, paired with a phone call and optional text message, prior to the final communication which is the eligible to disconnect notice (Figure 6).

Figure 6: Standard Collections Progress Timeline Example



*Payment reminders sent via email or text at 3,5 or 7 days before due date if enrolled.

**2% Late Payment Charge is assessed if payment not made by day 26, which is 6 day past due.

***A customer will receive paper mail notices and duplicate text, or emails if enrolled in payment alerts.

This timeline reflects the shortest possible time from bill print to shut-off eligibility.

Customer Communication and EWR: When customers enrolled in the program, they received a welcome letter¹² with program details, information about EWR services, and resources for energy assistance, including instructions to request a Home Heating Credit (HHC). The welcome letter also offered a complimentary in-home or virtual energy assessment and information about free energy efficiency upgrades aimed at reducing energy costs. For further assistance, customers were encouraged to contact the dedicated EWR phone line or visit the Helping Neighbors Program website¹³. Helping Neighbors provides income-qualified customers with a free in-home or virtual HEA, providing free energy-saving items like LEDs,

¹² Appendix D: PIPP Welcome Letter, pg. 99

¹³ <https://www.consumersenergy.com/residential/savings-and-clean-energy/assessments/helping-neighbors>

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insulating pipe wrap, and more. Customers will also receive tips on how to save more energy on their own.

Enrolling agencies were provided with a Frequently Asked Questions (FAQ) sheet¹⁴ to distribute to customers upon enrollment and were instructed to inform customers that the PIPP program is most effective when combined with the Helping Neighbors programs which enhance energy efficiency. The FAQ sheet included detailed information about the Helping Neighbors appointment, offering a guided enrollment approach if the customer chose to participate. If a customer enrolled with an agent, the agent documented the date and time of the Helping Neighbors appointment in a pre-populated form at the top of the FAQ document.

Agencies received training¹⁵ from Consumers Energy's income-qualified EWR teams and were advised to inform customers that a Helping Neighbors consultant would provide a HEA by assessing their home's energy efficiency at no cost. This assessment could lead to free upgrades including installation of weatherization products, replacement of appliances, pipe insulation, LED bulbs, low-flow showerheads, and faucet aerators, along with additional tips for saving energy. A selection of Michigan 211 local offices (a free service, with 7 regional contact centers, which connects Michigan residents with the help they need, providing community resources quickly, easily and confidentially) agreed to assist customers by either assisting them with signing them up for the HEA during the call or providing a link to the scheduling tool if they were not interested at that time.

¹⁴Appendix D: PIPP Frequently Asked Questions (FAQs) TrueNorth, pg. 108
Appendix D: PIPP Frequently Asked Questions (FAQs) UWSCMI, pg. 109

¹⁵ Appendix D: Helping Neighbors Agency Training Program, pg. 111

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Periodic follow-up communications were conducted with PIPP customers who did not utilize EWR services at enrollment to encourage their participation.¹⁶ These efforts, led by the Consumers Energy Income Qualified EWR team, were part of a broader outreach initiative to all eligible customers, including non-participating PIPP customers. After an assessment, technicians provided customers with brochures¹⁷ and additional information on ways to save on energy usage. Demonstrated below is the standard customer flow for those enrolling in EWR programs (Figure 7).

Figure 7: PIPP/CARE EWR Flow Chart



One month prior to graduation, customers receive a pre-graduation letter¹⁸ indicating their progress and summarizing the benefits received. This letter also includes the same EWR and HHC information contained in the welcome letter. If the customer has successfully completed

¹⁶ Appendix D: PIPP Helping Neighbors (Home Energy Audit) Brochure, pg. 128

¹⁷ Appendix D: PIPP EWR Marketing Home Energy Audit, pg. 130

¹⁸ Appendix D: PIPP Pre-Graduation Letter, pg. 105

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the program at the end of the 24-month period, a final letter is mailed congratulating them on their achievement and detailing the portion of past due balances that were paid as part of the program.¹⁹ Additionally, customers receive information including a website link about the Consumers Energy Budget Plan to support their ongoing success.

Program Administration – TrueNorth Community Services: TrueNorth is one of two agencies that administered the PIPP program for Consumers Energy. A representative from TN provided information on their administration, customer engagement, outreach, and communication, which are summarized below.

TrueNorth conducts an immediate eligibility assessment and refers participants to apply for DHHS's State Emergency Relief (SER) program. If a participant is denied SER, they may have still qualified for PIPP with proof of income below 150% of FPL.

The TrueNorth call center is available to answer participant questions and communicate any application documentation needs or questions. TN assigns a coach to each participant to explain program guidelines, review budgets, provide resource referrals for other needs such as food, housing, transportation and childcare, and offer ongoing support. All participants fill out a budget as part of the application process. TN coaches review the budget and the household's income vs. expenses. Coaches also identify any areas where the household might be able to decrease expense by accessing community resources and programs (i.e. food pantries or distribution, Medicaid, etc.). TN staff does not offer financial advice. The budget tool is to help staff find resource referral opportunities for the household. TN has also found that the budget is a great tool for households to see where they are spending, so it is a great self-awareness and

¹⁹ Appendix D: PIPP Graduation Letter, pg. 106

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educational tool. Follow-up occurs after six months to assess enrollment progress and household improvements. At the 6-month follow-up with the household, TN completes a self-sufficiency matrix to evaluate household progress and improvements. TN utilized the Arizona Self-Sufficiency Matrix²⁰, which is an evidence-based tool to measure self-sufficiency. The matrix was not used in calculating PIPP payment amounts. The TN team completes the matrix at intake so they can compare the household's growth toward self-sufficiency.

TrueNorth does not have a specific recruitment strategy; options are explained to participants who call the center. TN's application is web-based. Any household who has limited energy access or technology limitations may call the TN call center and the team will complete the TN application over the phone with them. In locations where TN has in-home workers, the TN team will go to the household and help them fill out the application.

Applications are reviewed, and after receiving necessary documentation, enrollment discussions ensured PIPP is the best assistance option. Payment history and income stability are assessed prior to enrollment. As a rule, if the household had three or more missed payments, TN would encourage the household to consider a MEAP One Time Assist (MEAP OTA). Household success on the program is important because bill payment is a vital part of long-term self-sufficiency and some HHs are just not in a place to be able to make consistent bill payments (i.e. very limited income, health situations). The priority is connecting households to the program in which they will be the most successful. TN considers participant payment history by looking at how many late or non-payments the participant had in the previous year.

²⁰ Appendix D: Arizona Self-Sufficiency Matrix, pg. 100

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If the household situation has changed since the inconsistent bill payment (i.e. new employment), TN would encourage the household to consider the PIPP. Each household makes their own decision on what program best fits their needs.

PIPP was presented to customers ineligible for the traditional APP, including those denied by DHHS or those who choose not to apply. The primary DHHS SER denial that TN recorded was due to failure to collect child support. If a household was eligible for child support, not receiving it, and not actively pursuing collection, they would be denied an SER. In many cases, the household was not pursuing child support because of domestic violence and safety concerns.

When reviewing potential plans for lower income customers (20-50% FPL), agencies often presented PIPP as an option because the customer payment obligation of the bill could be lower than it would have been if enrolled in CARE. The outreach and communication strategies for the PIPP program involved comprehensive training and resources to ensure effective customer engagement. TN utilized the PIPP Flat Rate Training Guide²¹, PIPP Sample Bill²², and PIPP Agency One-Pager²³ provided by Consumers Energy as training resources. These can be reviewed in the Appendix. Consumers Energy distributed these materials to TrueNorth prior to the start of enrollment. TrueNorth mailed and emailed the Helping Neighbors brochure¹⁶ along with weatherization and energy-saving tips²⁴ to clients. These strategies collectively enhance customer engagement and ensure that clients receive the support they need throughout their participation in the PIPP program.

²¹ Appendix D: PIPP Flat Rate Training Guide, pg. 131

²² Appendix D: PIPP Sample Bill, pg. 101

²³ Appendix D: PIPP Agency One Pager, pg. 138

²⁴ Appendix D: Weatherization and Energy Savings Tips, pg. 107

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Program Administration – United Way South Central Michigan: UWSCMI is an additional agency that administered the PIPP program for Consumers Energy. A representative from UWSCMI provided information on their administration, customer engagement, outreach, and communication, which are summarized below.

UWSCMI has applicants complete a MEAP Needs Assessment Energy Application²⁵, which includes questions about both utility and non-utility needs. Urgent needs are addressed immediately, while non-urgent referrals are provided at enrollment. Urgent needs are time sensitive; for example, if someone is going to be evicted and UWSCMI can find a rent assistance referral, UWSCMI would provide that right away. Non-urgent needs would include things like a referral for EWR services (unless the customer had a furnace out which would be classified as an urgent need). The UWSCMI team assesses the urgency of the needs on a case-by-case basis. Once enrolled in PIPP, monthly payments were credited to the client's account. If PIPP clients face financial hardship, they could have received one-time assistance through MEAP funds or Consumers Energy gift funds, depending on their eligibility.

UWSCMI offers several services, including needs assessments, financial counseling, vendor advocacy, short-term case management, and follow-up contacts. Needs assessments are used to evaluate client needs and provide appropriate referrals. Financial counseling includes optional budget coaching sessions, lasting about 45 minutes, to help clients review their expenses and identify cost-saving opportunities. UWSCMI intervenes with utility companies to prevent service shut off. Approximately nine months after enrollment, UWSCMI checks in with clients to assess their progress and determine if additional resources are needed. Follow-up

²⁵ Appendix D: UWSCMI MEAP Needs Assessment Application, pg. 142

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for PIPP clients is primarily through this check-in and any additional outreach initiated by clients seeking further assistance.

UWSCMI processes a high volume of utility assistance applications without additional outreach for PIPP. There was no specific recruitment for PIPP. When applicants seek utility assistance, eligible individuals were informed about PIPP as an option. The team used a PIPP Process Map to assess eligibility. In some cases, clients enrolled in PIPP without an approved SER, particularly if they encountered difficulties completing the SER application or were denied due to child support non-compliance. Clients were provided with information, and payment amounts for both PIPP and the CARE program, allowing them to choose their preferred enrollment option. This approach respects the client's right to self-determination, as outlined in the Social Work Code of Ethics²⁶.

The outreach and communication strategies for the PIPP program involved comprehensive training and resources to ensure effective customer engagement. UWSCMI collaborated with Consumers Energy for at least nine months before launching the PIPP program. During this period, they developed the PIPP Process Map²⁷ and other program guidelines. Prior to the program launch, UWSCMI staff received training using the PIPP training document provided by Consumers Energy. This training equipped them to handle customer inquiries effectively. UWSCMI created a Decision Matrix²⁸, to help staff provide detailed information about the benefits of each utility assistance plan available. UWSCMI team members could address questions during weekly meetings or through a Teams Chat accessible to all staff, ensuring

²⁶ [https://www.socialworkers.org/About/Ethics/Code-of-Ethics/Code-of-Ethics-English\[socialworkers.org\]](https://www.socialworkers.org/About/Ethics/Code-of-Ethics/Code-of-Ethics-English[socialworkers.org])

²⁷ Appendix D: PIPP Agency Training Process Map for Enrollment and Dunning, pg. 140

²⁸ Appendix D: PIPP Agency Needs Assessment Decision Matrix, pg. 141

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continuous support and knowledge sharing. Clients received welcome letters¹² and FAQs for Agents to guide them through the enrollment process and answer common questions. These strategies collectively enhance customer engagement and ensure that clients receive the support they need throughout their participation in the PIPP program.

Year Two Income Verification (TN & UWSCMI): Income verification for the second year was not conducted by TrueNorth or UWSCMI. Income revalidation is seen as a barrier for clients' continued success and the Company did not recommend it for that reason. At the time of enrollment, the primary objective was to establish eligibility for the entire two-year program duration while providing resources to enhance household self-sufficiency. This approach focused on collaborating with participants to improve their income and earning potential, rather than re-evaluating income levels annually. However, if customers reach out with urgent needs, agencies conducted further assessments to evaluate their current situation and explore additional assistance options.

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5. Structure of Consumers Energy's Affordable Payment Plan Programs

Consumers Energy conducted an analysis of its PIPP Pilot in comparison to other APPs offered by the Company, including the CARE Flat Rate and CARE MB plans. After several years of successfully operating the CARE Flat Rate payment plan, Consumers Energy was mandated by the MPSC to revise this program for the fiscal year 2024. The newly revised payment plan, CARE MB, transfers the variability of consumption to the customer, with the payment amount subject to adjustment every six months during enrollment in the program. The Company continues to partner with agencies to ensure customers are well educated on the newly designed payment plan.

The Company uses the following key metrics to evaluate these programs.

- Total Customers Enrolled in PIPP vs. CARE Flat
- Overall Default Rate
- Default Rate by Commodity (Gas, Electric, Combo)
- On-Time Payments
- Average Monthly Cost Per Agency Payment
- Average Consumption Change
- Average Arrears at Enrollment
- Enrollment Status (still enrolled, agency de-enrolled, moved out, payment default)

CARE Flat Rate Program: The CARE Flat Rate Program is a 24-month initiative where customers pay a fixed monthly amount based on their consumption level and FPL. Past

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arrears are gradually forgiven over the program's duration. New enrollments for this program ceased at the end of fiscal year 2024 with the introduction of the CARE MB program.

Customers are enrolled for a full two years, automatically transitioning to the second year after 12 months. After the initial eligibility screening, MEAP agencies do not perform income verification for the CARE program. However, if customers reach out with urgent needs, agencies conduct further assessments to evaluate their current situation and explore additional assistance options. Customers incur no late payment charges and are protected from service shut off while enrolled. Residential electric, natural gas, or combination customers are eligible for this program, and their income must be between 20% and 150% of the FPL. The MEAP guidelines²⁹ for CARE Flat Rate suggested that households with income under 20% FPL should not generally be considered for an APP, but may have been considered for exception. Customers are also required to have an approved SER, and they cannot have any unresolved theft or fraud issues on their account. Upon enrollment, past arrears are frozen and divided over 24 months. There is a \$4,000 cap on arrears for enrollment. No specific consumption cap is required for eligibility. The arrears that are carried into the program are divided into equal monthly payments that span over 24 months and forgiven with a payment made by the agency, which is separate from the monthly consumption payment.

Customer payment amounts are based on usage and FPL, remaining fixed during heating and non-heating seasons. There are no bonuses for timely payments, aside from shut off protection

²⁹ <https://www.michigan.gov/mpsc/-/media/Project/Websites/mpsc/consumer/meap/2023/2023-MEAP-Policy-Manual.pdf?rev=000eed8604a545caab258a5706df8f42>

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and arrears forgiveness as part of being enrolled in the program and paying on time. Monthly payment amounts for customers are shown below (Figure 8).

Figure 8: Payment Amounts for Customers on CARE Flat Rate

Commodity	Average Consumption	FPL Tiers	Customer Monthly Payment Plan Amount	Arrears Cap
Combo	Low Consumption Elec & Gas Elec ≤ \$2000/yr & Gas ≤ \$1000/yr	20-75%	\$90	≤ \$4000
		76-110%	\$105	
		111-150%	\$120	
	High Consumption Elec & Low Consumption Gas Elec ≥ \$2001/yr & Gas ≤ \$1000/yr	20-75%	\$120	
		76-110%	\$135	
		111-150%	\$150	
	Low Consumption Elec & High Consumption Gas Elec ≤ \$2000/yr & Gas ≥ \$1001/yr	20-75%	\$100	
		76-110%	\$115	
		111-150%	\$130	
	High Consumption Elec & Gas Elec ≥ \$2001/yr & Gas ≥ \$1001/yr	20-75%	\$130	
		76-110%	\$145	
		111-150%	\$160	
Electric Only	Low Consumption: ≤ 2000/yr	20-75%	\$60	
		76-110%	\$70	
		111-150%	\$80	
	High Consumption: ≥ 2001/yr	20-75%	\$90	
		76-110%	\$100	
		111-150%	\$110	
Gas Only	Low Consumption: ≤ 1000/yr	20-75%	\$30	
		76-110%	\$35	
		111-150%	\$40	
	High Consumption: ≥ 1001/yr	20-75%	\$40	
		76-110%	\$45	
		111-150%	\$50	

Customers remain enrolled in CARE Flat Rate unless they are two months past due on payments. To keep customers well-informed and supported throughout the process, and to provide timely warnings about potential program defaults, the Company proactively reaches out to CARE customers via phone and mail. The number of times a communication is sent is based on customer response of the first communication. Upon the first missed payment, a Late

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Payment warning letter³⁰ is issued (4 days after the payment due date). A default letter³¹ is sent after the customer's payment is two months past due (34 days after the payment due date), and a follow-up phone call is made four days after the default letter. If a payment is not made by the second warning due date, the customer is de-enrolled from the program, and a de-enrollment letter³² sent.

CARE Modified Budget Program: The CARE MB Program is an updated version of the CARE Flat Rate Program, designed to encourage customers to manage their energy usage more effectively. The program began with a soft launch in fiscal year 2023 (October 2022 through September 2023), aiming to enroll 1,000 customers, and became the primary APP at the start of fiscal year 2025 (October 2024 through September 2025). This program operates on a budget plan model, allowing for adjustments to customer payments if there is a change of \$5 or more. Arrears are paid off in three installments throughout the two-year program³³.

Customers are enrolled for a full two years, automatically transitioning to their second year after 12 months. Customers incur no late payment charges and are protected from service shut off while enrolled. In accordance with MEAP guidelines³⁴, Residential electric, natural gas, or combination customers are eligible for this program, and their income must be between 0% and 150% of the FPL. Customers are also required to be approved for SER bill payment assistance, and they cannot have any unresolved theft or fraud issues on their account. Past

³⁰ Appendix E: CARE Modified Budget Late Payment Letter, pg. 148

³¹ Appendix E: CARE Modified Budget Default Letter, pg. 149

³² Appendix E: CARE Modified Budget De-enrollment Letter, pg. 150

³³ Appendix E: CARE Modified Budget Agency One-pager, pg. 165

³⁴ https://www.michigan.gov/mdhhs/-/media/Project/Websites/mpsc/consumer/meap/2025/2025_MEAP_Policy_Manual.pdf?rev=790d288bfd464a8fb0136fdbaf98f600

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arrears are frozen upon enrollment. There is no cap on arrears for enrollment, which are paid off in three installments where up to \$600 of arrears are forgiven within the first 30 days, an additional \$600 may be forgiven at the end of the first year, and an additional \$1,800 may be forgiven at graduation³⁵. Any remaining arrears over \$3,000 is applied to the first bill after graduation. Graduates receive a communication about automatic enrollment in the Consumers Energy Budget Plan for ongoing bill management³⁶. Graduates have the option to participate in other payment programs that suit their ongoing needs but were not automatically enrolled into a new program post-graduation.

Customer payment amounts are based on a matrix of usage and income levels, remaining fixed during heating and non-heating seasons. Monthly payments can change based on consumption after reviews³⁷ at 6, 12, and 18 months. Customers using less electricity and/or gas than projected may see lower bills, while those using more may face higher bills. Changes are applied automatically in the next billing cycle, but only if the adjustment is \$5 or more. There is no consumption cap. The Company invoices the MEAP agencies to gather the required funds for customer credits. This billed amount, referred to as a “gap credit” is applied to the customer’s monthly usage cost and appears on their bill as a credit. The gap credit is calculated based on FPL and the customer’s consumption. The annual credit is broken down monthly with 70% of it applied from November through May, and 30% of it applied June through October. This is in line with the MEAP crisis season and spending guidelines. Monthly credit amounts for customers shown below (Figure 9). For fiscal year 2026, new MEAP

³⁵ Appendix E: CARE Modified Budget Pre-Graduation Letter, pg. 152

³⁶ Appendix E: CARE Modified Budget Graduation Letter, pg. 153

³⁷ Appendix E: CARE Modified Budget Review Letter (6, 12, 18), pg. 151

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legislation changes have removed the 70/30 crisis season spend down requirement and as a result, Consumers Energy will work to align credits to support new eligibility requirements. The Company will maintain its collaboration with the MPSC, various agencies, and utility partners to ensure the CARE MB credit structure remains aligned.

Figure 9: Monthly Credit Amounts for Customers on CARE MB

CARE MB FY25 Monthly Credits					
Commodity	FPL Tiers	Usage (average consumption)	Heating Season (November-May)	Non-Heating Season (June-October)	Average Monthly Credit
Combo	Between 0%-75%	High Usage (>\$220)	\$153.00	\$69.00	\$118.00
		Low Usage (≤\$220)	\$30.00	\$5.00	\$19.58
	Between 76%-110%	High Usage (>\$220)	\$111.00	\$42.00	\$82.25
		Low Usage (≤\$220)	\$12.00	\$5.00	\$9.08
	Between 111%-150%	High Usage (>\$220)	\$68.00	\$17.00	\$46.75
		Low Usage (≤\$220)	\$5.00	\$5.00	\$5.00
Electric Only	Between 0%-75%	High Usage (>\$140)	\$111.00	\$55.00	\$87.67
		Low Usage (≤\$140)	\$24.00	\$5.00	\$16.08
	Between 76%-110%	High Usage (>\$140)	\$83.00	\$37.00	\$63.83
		Low Usage (≤\$140)	\$13.00	\$5.00	\$9.67
	Between 111%-150%	High Usage (>\$140)	\$55.00	\$21.00	\$40.83
		Low Usage (≤\$140)	\$5.00	\$5.00	\$5.00
Gas Only	Between 0%-75%	High Usage (>\$80)	\$70.00	\$5.00	\$42.92
		Low Usage (≤\$80)	\$5.00	\$5.00	\$5.00
	Between 76%-110%	High Usage (>\$80)	\$50.00	\$5.00	\$31.25
		Low Usage (≤\$80)	\$5.00	\$5.00	\$5.00
	Between 111%-150%	High Usage (>\$80)	\$30.00	\$5.00	\$19.58
		Low Usage (≤\$80)	\$5.00	\$5.00	\$5.00

Just like CARE Flat Rate, CARE MB Customers remain enrolled unless they are two months past due on payments. To keep customers well-informed and supported throughout the process, and to provide timely warnings about potential program defaults, the Company proactively reaches out through various methods. Upon the first missed payment, a Late Payment warning letter is issued (4 days after the payment due date). A default letter is sent

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after the customer's payment is two months past due (34 days after the payment due date), and a follow-up phone call is made four days after the default letter. If a payment is not made by the second warning due date, the customer is de-enrolled from the program, and a de-enrollment letter sent.

For the CARE MB program, outreach and education strategies are like those used in the CARE Flat Rate program. For both CARE Flat Rate and CARE MB, customers are encouraged to seek energy efficiency solutions. Upon CARE enrollment, customers receive a welcome letter³⁸ detailing a free in-home or virtual HEA and information on energy efficiency upgrades. Agents explain that participation in these programs can help reduce energy usage and costs. At the six-month review, customers received an additional letter³⁹ promoting the HEA and encouraging further energy efficiency upgrades⁴⁰. A dedicated phone number for enrollment and additional information is provided. Customers are also encouraged to apply for a HHC and receive tax assistance through MichiganFreeTaxHelp.org. MEAP agencies continue to receive periodic training from Consumers Energy's Income Qualified EWR teams. The EWR team conducts quarterly outreach campaigns targeting customers who have not yet received a HEA⁴¹.

Agency Administration: Consumers Energy partners with various agencies to provide energy assistance programs, including help with energy bills, household budgeting, and energy efficiency. Agencies that administer the CARE MB program include UWSCMI, United Way of Southeastern Michigan (UWSEM), TrueNorth, The Salvation Army (TSA or SA), The Heat and

³⁸ Appendix E: CARE Modified Budget Enrollment Welcome Letter, pg. 147

³⁹ Appendix E: CARE MB Review Letter, pg. 151

⁴⁰ Appendix G: 100 Ways to Save on Your Energy Bill, pg. 170

⁴¹ Appendix E: CARE Marketing Helping Neighbors (Home Energy Audit), pg. 154

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Warmth Fund (THAW), Barry County United Way (BCUW), St. Vincent de Paul Society (SVDP), and The Bureau of Community Action and Economic Opportunity (BCAEO)⁴².

Each agency independently leverages their own tactics for program administration. Commonly utilized tactics include:

- **Self-Sufficiency Services:** Agencies evaluate customer needs and provide referrals for various assistance options (i.e. food assistance, housing, childcare). Additionally, Assurance 16 provides self-sufficiency services which aid participants with the following: paying their energy bills on time, budgeting for energy expenses, and utilizing energy services to optimize energy efficiency. Self-sufficiency activities include a Needs Assessment and referral for outside services, advocating on behalf of the customers with the utility, energy savings education, financial counseling, and short or long-term case management.
- **Application Process:** Customers seeking assistance must first apply for and receive a SER payment from MDHHS. Once approved, customers are assigned a MEAP navigator through MDHHS that will direct the customer to a MEAP agency for consultation of available services. Customers can apply via phone, online, or by mail. Urgent referrals are made immediately, while non-urgent referrals are provided within a day, covering resources for food, transportation, and workforce development. During the application, customers may opt for a Needs Assessment to address non-utility needs. Eligible customers are referred to the Consumers Energy Helping Neighbors program for home energy efficiency audits and savings options.

⁴² Appendix F: CARE Modified Budget Partnering Agencies, pg. 167

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- **Payment Processing:** Once enrolled in the CARE MB, the agency's assistance payment is electronically credited to the customer's Consumers Energy account monthly. If customers face additional hardships, they can contact the agency for one-time assistance using MEAP funds.
- **Financial Counseling:** Agencies offer optional budget tools to help reduce expenses.
- **Vendor Advocacy:** Agencies intervene on behalf of clients with utility companies to prevent service shut off.
- **Short-Term Case Management:** Agencies typically check in with clients 6-9 months after enrollment to assess their progress and determine if further resources are needed.
- **Follow-Up Contacts:** Follow-up is limited to the short-term case management check-in and any additional assistance requested. Clients in the 0-19% FPL category receive long-term case management, including goal setting and monthly check-ins.

Each agency employs its own communication and outreach activities for effectively engaging customers. At the start of each grant season, Consumers Energy provides updated training on all available programs, including CARE MB. Agencies receive virtual training sessions and a training presentation⁴³. Questions from agency staff are addressed during bi-weekly touchpoint sessions that are held between the Company and agency. These sessions focus on reviewing program performance, discussing challenges, and identifying support needed to effectively serve customers seeking energy assistance. Consumers Energy maintains an email inbox for agencies to submit questions or request assistance regarding specific customer cases, with responses provided within 24 hours. Agencies collect feedback on barriers to assistance and

⁴³ Appendix E: CARE Modified Budget Agency Overview Training, pg. 155

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work to address these issues through tools like an agency self-service portal and advocacy for systemic change. Consumers Energy keeps agencies informed of program updates through a quarterly e-newsletter⁴⁴.

Agencies receive numerous applications for utility assistance and typically do not conduct additional outreach for programs like CARE MB. The utility frequently educates vulnerable customers of available assistance programs via outreach and through website information. In the initial month of deployment, agencies reported high application volumes and felt no additional outreach was necessary. However, outreach strategies may vary based on factors such as application volume and weather conditions, and agencies continue to assess this need. Agencies are provided with lists of customers who have received SER but have not enrolled in the CARE MB Program, which can be leveraged for additional outreach based on the agency's program capacity.

Consumers Energy also evaluates the need for supplemental communications and outreach to ensure maximum awareness and engagement. Consumers Energy actively communicates at-risk customer segments regarding assistance programs through bill messages, website updates, and direct emails. This outreach targets those who have not received SER, HHC, or one-time agency assistance in the last fiscal year. Consumers Energy collaborates with nonprofit organizations to educate them about available assistance programs. This equips these partners to better inform low-income customers about their options, highlighting the program as a key pathway to financial stability.

⁴⁴ Appendix F: Agency Newsletter, pg. 168

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Year Two Income Verification: After the initial eligibility screening, MEAP agencies do not perform income verification for the CARE MB Program. However, if customers reach out with urgent needs, agencies conduct further assessments to evaluate their current situation and explore additional assistance options.

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6. Consumers Energy's Enrollment and Recruitment for the PIPP Pilot

The Company aimed to represent all commodities and FPL tiers at or below 150%, like the structure of the CARE Flat Rate Program. The targeted FPL and commodity recruitment structure was divided between the two enrollment agencies with each agency having a total target of 400 enrollments. Enrollment targets by commodity and FPL are shown below (Figure 10). The commodity and FPL structure is uniform to that of CARE. The Company asked agencies to ensure enrollments were properly balanced in each commodity and FPL buckets to ensure the pilot would have a good comparison against the structure of CARE.

Figure 10: PIPP Enrollment Targets

PIPP Program Enrollment Targets		
Combo	Federal Poverty Level	433
	20-75%	196
	76-110%	148
	111-150%	89
Electric		297
	20-75%	134
	76-110%	99
	111-150%	64
Gas		70
	20-75%	28
	76-110%	25
	111-150%	16
Grand Total		800

In contrast to the Company's existing APP programs, enrollment in PIPP did not require a SER payment or qualification, allowing access for customers who did not qualify for the MEAP. While recruitment focused on FPL criteria, enrollment agencies did not specifically consider customer's individual situations, arrears, or billing scenarios. The Company did not direct

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agencies to prioritize these factors, aiming instead for a comprehensive view of the PIPP program. Agencies assessed whether PIPP was a better fit for customers based on their unique needs considering all available programs (Figure 29).

The Company instructed enrollment agencies to collect demographic information, including age, employment status, and fixed income. However, agencies were not specifically directed to target these demographics for enrollment, which aligns with traditional APP practices.

Consumers Energy did not track or target specific vulnerable populations and exclusively focused on customers based on FPL. This is true across all APP programs and the PIPP pilot.

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7. Summary of the Data Collection Dashboard

The data collection dashboard provides comprehensive information on the CARE Flat Rate, CARE MB, and PIPP Pilot programs. Utilizing Microsoft Power BI for visualization, it connects databases to track customer enrollments and agency payments. The dashboard reports metrics for the fiscal year (October 1 - September 30) and is divided into two main categories: enrollment and financial reporting. Example dashboard reports for the CARE MB and PIPP Pilot programs are illustrated below (Figures 11 and 12). Detailed information and source data on metric calculations are available in the Appendix⁴⁵.

Enrollment metrics include:

- Year-end enrollment targets (provided by agencies)
- Roll-over customers from the previous fiscal year
- New customers enrolled
- Current enrollments by program
- Current enrollments by FPL
- Current enrollments by commodity
- De-enrollments due to default or reaching the MEAP cap
- Number of customers graduating in the current month and the next two months

Financial metrics include:

- Funding targets (provided by agencies)
- Current spending for the fiscal year

⁴⁵ Appendix G: APP Agency One Pager Summary, pg. 186

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- Forecasted spending at the end of the fiscal year
- Difference between projected spending and funding targets
- Current arrears, credits, and reconciliations billed to date
- Forecasted future credits, arrears, and reconciliations
- Average cost per customer by FPL

Consumers Energy uses these reports to monitor progress and identify trends. The Company maintains open communication with agencies through bi-weekly meetings to discuss performance, address any risks or concerns, and ensure effective service delivery. Reports are shared with agencies to help them track their spending and enrollment status throughout the fiscal year.

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Figure 11: CARE MB Dashboard



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Figure 12: PIPP Pilot Dashboard



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8. Data

Overview: The data gathered for this study encompasses PIPP, CARE, CARE MB, low-income, and non-low-income accounts. The time over which the data for these programs was analyzed is illustrated for both calendar year and fiscal year (FY) below (Figure 13).

Figure 13: Program Comparison for Data File Table

	Pre - Plan	Plan Duration
PIPP	Oct 2021 (FY22) - Jan 2023 (FY23)	Oct 2022 (FY23) - Jan 2025 (FY25)***
CARE	Oct 2021 (FY22) - Jan 2023 (FY23)	Oct 2022 (FY23) - Jan 2025 (FY25)
CARE Modified Budget (MB)	Oct 2022 (FY23) - Sept 2023 (FY23)	Oct 2023 (FY24) - Sept 2024 (FY24)
Low Income	Oct 2021 (FY22) - Sept 2022 (FY22)*	Oct 2022 (FY23) - Sept 2024 (FY24)**
Non – Low Income	Oct 2021 (FY22) - Sept 2022 (FY22)*	Oct 2022 (FY23) - Sept 2024 (FY24)**

Supporting Information for all data sets are in the "Explanation" Section of the data files.

*Pre-plan data: Anchored on 10/01/2021 as 12 months before program start date. Total timeframe limited to 12 months.

**Plan data: Anchored on 10/01/2022 as program start date. Total timeframe limited to 24 months.

***PIPP data was through Jan 2025. One customer remained on the program and graduated in Feb 2025, which is not included in the data.

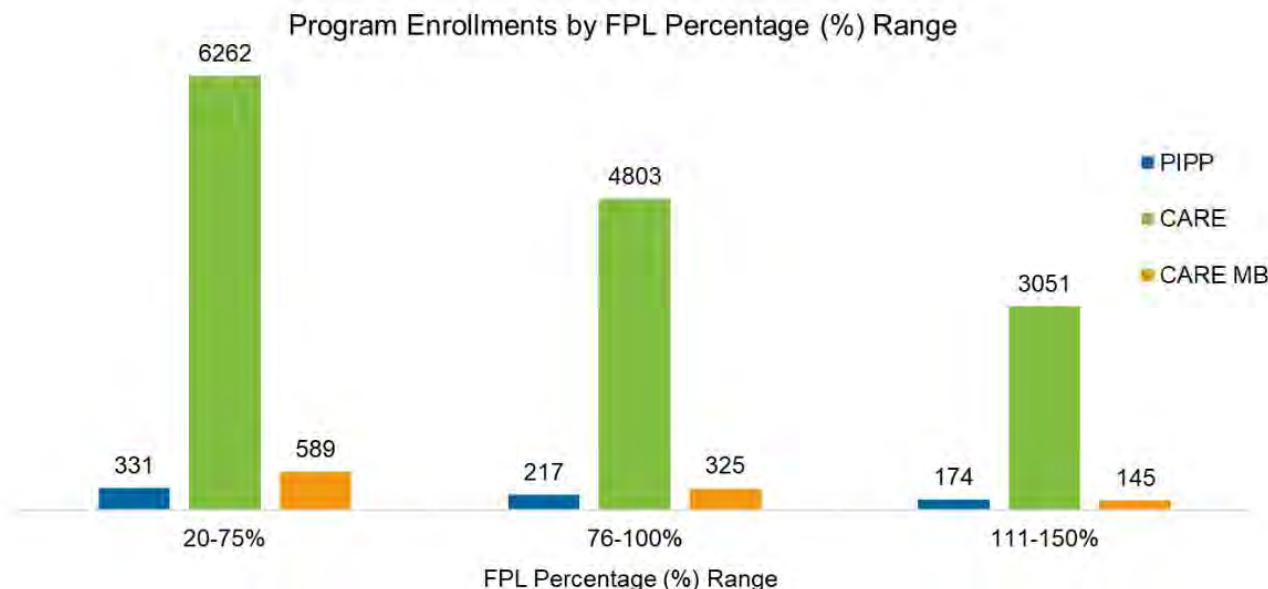
Enrollments by Federal Poverty Level: Figure 14 illustrates the enrollment percentages for PIPP, CARE, and CARE MB based on FPLs. These programs cater to customers within the 20-75%, 76-110%, and 111-150% FPL brackets. The data for CARE MB represents the pilot year preceding its full launch. The Company did not separately track exception enrollments for customers within the 0-19% FPL bracket for these programs as the data impact is negligible.

For PIPP, most participants fall within the 20-75% FPL range, a trend consistent across CARE and CARE MB. The FPL ranges exhibit similar patterns regardless of the program. As previously mentioned in Section 6, the Company aimed to represent all commodities and FPL tiers at or below 150%, similar to the structure of the CARE Flat Rate Program. A targeted FPL and commodity recruitment structure for PIPP was divided between the two enrollment

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agencies. This strategy was designed to ensure a good representation of commodity and FPL brackets, allowing for better performance comparison against other programs operating in the same manner.

Figure 14: Program Enrollments by FPL Percentage (%) Range

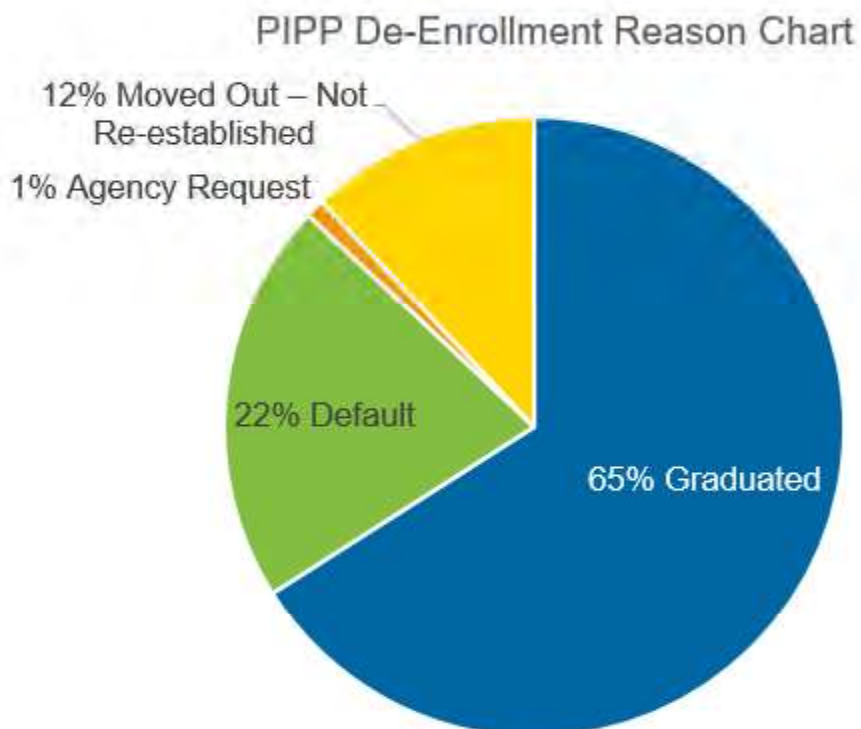


Program De-Enrollments for PIPP: The reasons for de-enrollment from PIPP were documented for the 722 customers enrolled in the pilot program (Figure 15). Of these, 65% successfully completed the 24-month program. However, 12% were removed because they relocated and did not re-establish service within the Consumers Energy service territory. Approximately 1% of customers were de-enrolled following interactions with TrueNorth or UWSCMI, often due to program fit or lifestyle changes discussed during these interactions. An example of this would be if the customer experienced a life event such as job loss that changed their financial status. Agency audits may also lead to customer de-enrollments if identified issues are not resolved between the agency and the customer.

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Additionally, 22% of customers defaulted from the program after missing two consecutive payments without contacting the agency or utility to make arrangements. PIPP customers were not re-validated by the agency or utility after the initial eligibility determination at the time of enrollment as this was not a requirement shared for this pilot.

Figure 15: PIPP De-Enrollments by Reason

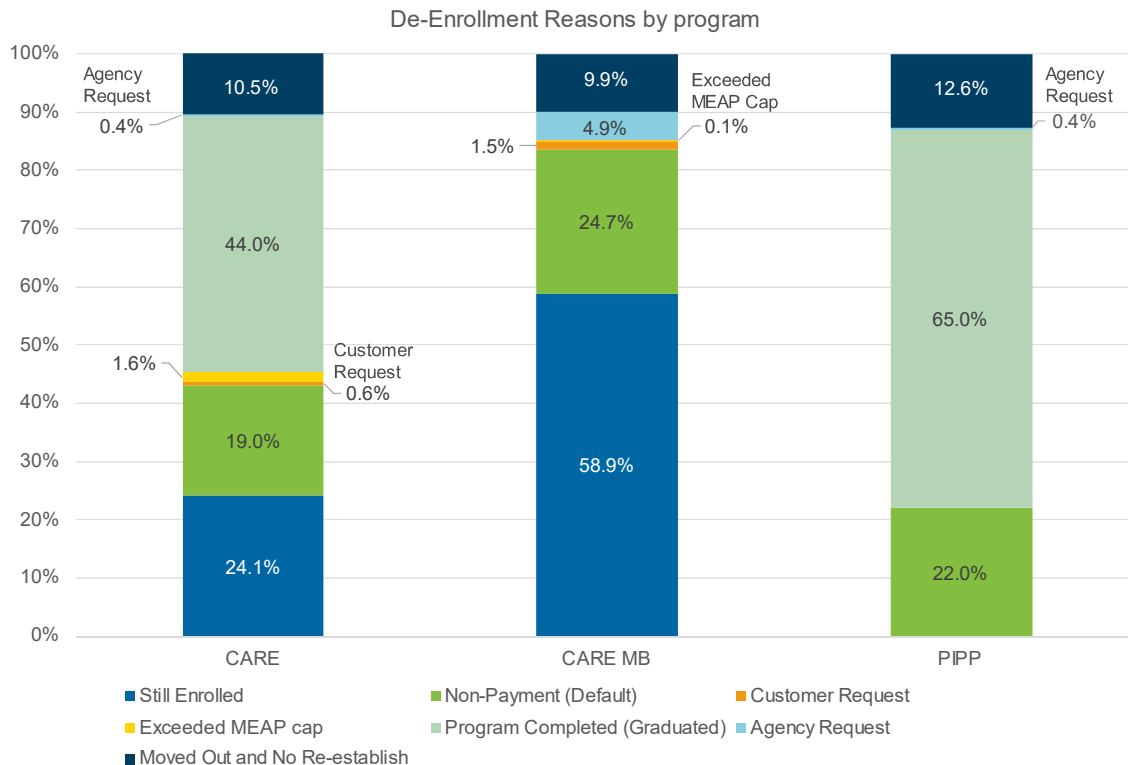


Program De-Enrollments comparison of CARE, CARE MB, and PIPP: The CARE Flat Rate and CARE MB Programs experienced additional factors influencing de-enrollment that differed from PIPP, primarily due to differences in program design (Figure 16). The CARE MB Program pilot, launched at the beginning of FY24 and set for full rollout to replace CARE in FY25, currently lacks program completion data customers have not reached the full 24-month completion. It has been observed that default rates across all three programs are quite similar.

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It is important to note that the CARE MB Program pilot launched during unprecedented times, where customers faced greater challenges in receiving assistance compared to the previous 4-5 years. This was due to the early depletion of SER funds in fiscal year 2024, decreased payment amounts that a customer may receive when applying for SER, and less funds allocated towards the HHC resulting in less customers served. Fiscal year 2024 also marked the end of many programs that were available due to the increase in energy assistance funding from the COVID-19 pandemic. The combination of programmatic, funding, and environmental changes makes it difficult to draw distinctive conclusions on various success criteria.

Figure 16: De-Enrollment Reasons by Program



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Figure 17: Program De-enrollment Reason Detail

Program DE-ENROLLMENT REASON	CARE		CARE MB		PIPP	
	Count	%	Count	%	Count	%
Still Enrolled	3398	24	624	59	0	0
Non-Payment (Default)	2682	19	261	25	159	22
Move-In Revalidation Expired	0	0	0	0	0	0
Customer Request	77	1	16	2	0	0
Moved/Transfer of Service	0	0	0	0	0	0
CE Request	0	0	0	0	0	0
Move-In Revalidation Denied	0	0	0	0	0	0
Annual Revalidation Period Expired	0	0	0	0	0	0
Annual Revalidation Denied	0	0	0	0	0	0
Exceeded MEAP cap	220	2	1	0	0	0
Program Completed (Graduated)	6207	44	0	0	469	65
Agency Request	51	0	52	5	3	1
Moved Out and No Re-establish	1481	10	105	10	91	12

Program Success Rates: The Company assessed the success of the programs during the sample period previously mentioned as shown above (Figure 17). Success is defined by subtracting the non-payment default percentage from the total number of customers who de-enrolled. This calculation represents the ratio of customers who remain enrolled despite non-payment to the total number of customers participating in the program. As depicted below (Figure 18), the CARE program achieved an 81% success rate. The data for the PIPP and CARE MB Programs represent a smaller segment and may not provide a direct comparison to the CARE Program due to the smaller sample size.

Figure 18: Program Success Rate

Program	Success Rate
CARE	81%
PIPP	78%
CARE MB	75%

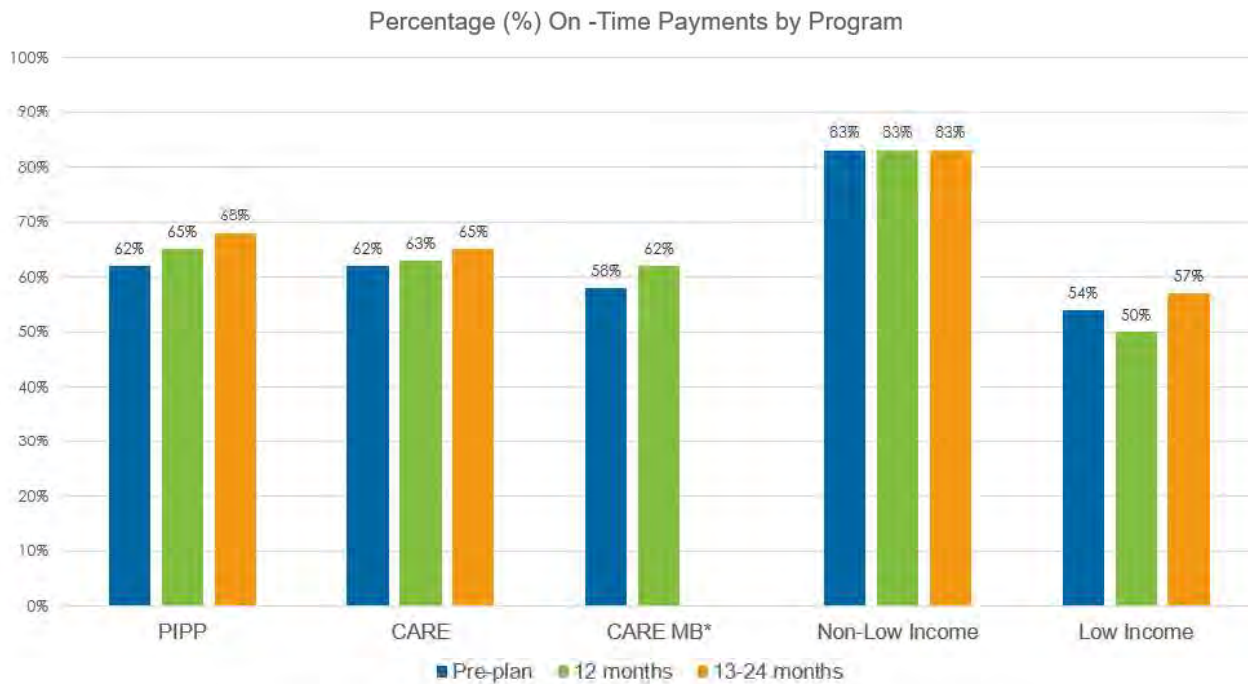
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On-Time Payment Behaviors: An analysis was conducted to compare on-time payment behaviors across all segments measured in this report (Figure 19). According to the applicable Michigan Customer Standards and Billing Practices rules (R460.102)⁴⁶, as shown previously in Figure 6, a bill is considered delinquent if charges remain unpaid for at least five days past the due date. The data was evaluated for customers who paid before a bill was categorized as delinquent. On-time payment behaviors for PIPP, CARE, and CARE MB showed improvements from pre-plan through the plan duration. A notable outcome demonstrated by the study was that payment behaviors improved positively regardless of the APP, with negligible performance variance between the plans. Differences in customer profiles could explain the slight variances between the programs. For example, Consumers Energy does not impose a consumption cap for program entry, which could be a determining factor for the incoming customer profile. Additionally, household compositions vary across all programs, resulting in a deviation of energy efficiency within the household. For example, according to the PIPP survey which can be found in the Appendix, household demographics for PIPP customers primarily composed of the 55-65 age group, as opposed to CARE that represented a majority in the 35-44 age group. In the 12 months before enrollment, the CARE MB pilot customers had the lowest pre-plan on-time payment percentage. Three potential causes for the difference in the data could be: the date ranges were different time periods for CARE MB versus the other APPs; data span for CARE MB was for 12 months, while PIPP and CARE pre-plan data ranges were 15 months; and the volatility of the small pilot size based on the limited funding. Additionally, CARE MB also had different eligibility criteria.

⁴⁶ https://www.michigan.gov/-/media/Project/Websites/mpsc/regulatory/rules-laws/New_Electric_and_Gas_Residential_Service.pdf?rev=aa9441ce71cf496c80db60380754385b

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Figure 19: Percentage (%) On-time Payments by Program



*CARE MB Enrollment began 10/01/2023. No data available for 13–24-month Segment.

Late Payment Charges: The Company does not impose late payment charges while customers are enrolled in CARE, CARE MB, or PIPP. However, as part of a program design element, any late payment charges that are part of the arrears balance prior to enrollment in an APP will be reversed and no longer be the customer’s responsibility. In accordance with the applicable Michigan Customer Standards and Billing Practices Billing rules (R460.122)⁴⁷, a 2% late payment charge is applied to any unpaid accumulated energy and miscellaneous charges, excluding sales tax and prior accumulated late payment charges. For residential accounts not

⁴⁷ https://www.michigan.gov/-/media/Project/Websites/mpsc/regulatory/rules-laws/New_Electric_and_Gas_Residential_Service.pdf?rev=aa9441ce71cf496c80db60380754385b

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participating in CARE, CARE MB, or PIPP, the late payment charge is assessed on unpaid charges that are six or more calendar days past due.

Disconnect Rates: An analysis was conducted across all programs to evaluate service disconnection rates. The data represents customers who were disconnected for non-payment after attempts to contact them were unsuccessful in collecting payment, as part of the standard dunning process outlined previously in Figure 6. The timeframe for each observation is shown in Figure 20 for CARE, CARE MB, and PIPP. The timeframe measured for Low Income Assistance (LIA), Residential Income Assistance (RIA), and low-income spanned across the pre-plan and plan duration, as outlined previously in Figure 13. As referenced in the footnote, the disconnection data for the 12 months post-successful graduation was not available for CARE MB and PIPP due to the timing of the program duration.

The overall observations of the data demonstrate that CARE and PIPP have similar pre-program disconnection rates compared to CARE MB, which displayed a slightly better outcome. The disconnection rates for LIA, RIA, and low-income are comparable to CARE. Overall, the observation is that disconnection data was quite similar across all programs. There is optimism that CARE MB customers may achieve greater success due to the additional engagement and education provided during payment reconciliation periods on EWR programs and services, which promote long-term sustainability.

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Figure 20: Program Disconnection Rate

Program	Disconnect Rate
CARE (within 12 months of program default)	15%
CARE (within 12 months of successful graduation)	8%
CARE MB (within 12 months of program default)*	10%
CARE MB (within 12 months of successful graduation)**	N/A
PIPP (within 12 months of program default)*	17%
PIPP (within 12 months of successful graduation)**	N/A
LIA (includes any other energy assistance payment and excluding all APPs)	14%
RIA (includes any other energy assistance payment and excluding all APPs)	13%
Low-income (includes any other energy assistance payment and excluding all APPs)***	13%

*PIPP concluded in February 2025, CARE MB began October 2024 thus full dataset unavailable for full 12 months after all defaults

**PIPP concluded February 2025, CARE MB Pilot began October 2023, thus insufficient time has passed for reporting results to be shown

***Low-income Dataset comprised of the LIA and RIA datasets

Consumption Comparison: An analysis of consumption across all FPL ranges for electric (kWh) and gas (Mcf) was performed for PIPP, CARE, CARE MB, low-income, and non-low-income groups, measured against the time frames referenced previously in Figure 13. Figure 21 demonstrates a downward trend in consumption across all programs. One notable exception observed was an increase in consumption during the first year of the PIPP program, which decreased as the customer progressed further into the program. The slight variation in data could be attributed to household composition or household efficiencies for the specific participants measured. An examination of weather patterns over the observed periods did not reveal any significant trends that could noticeably affect energy consumption when considering the entire time span.

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In summary, the overall trends demonstrate a reduction in consumption as the programs progressed. Overall, customers enrolled in both CARE programs and PIPP demonstrated higher usage compared to low-income and non-low-income groups.

Figure 21: Household Consumption by Customer Segment

Consumption Period		PIPP		CARE		CARE MB		Low Income		Non-Low Income	
kWh	Mcf	kWh	Mcf	kWh	Mcf	kWh	Mcf	kWh	Mcf	kWh	Mcf
Pre-Plan		878	8.1	883	8.6	898	8.9	705	6.9	682	7.1
1-12 Months on Plan		901	9	876	8.5	861	8.8	657	6.6	633	6.5
13-24 Months on Plan		872	7.7	816	7.9	-	-	648	6.2	632	5.9

All items measured across respective timeframes

CARE MB has only completed 12 months therefore 13–24-month data is unavailable

Energy Waste Reduction Participation and Findings: An analysis was performed on customers enrolled in PIPP to determine what EWR services customers participated in while enrolled in the pilot. The analysis indicated that 214 unique customers participated (Figure 22). Roughly 25 customers enrolled in multiple services, resulting in a total of 239 services enrolled. The majority of customers received a personalized home energy report or participated in a Residential HEA, which offers energy savings tips and upgrades for the customer to be successful in managing usage within the home.

Figure 22: EWR Enrollments

Program Name	# of Customers enrolled in EWR	% of overall PIPP Enrollees (722)
PERSONALIZED HOME ENERGY REPORT (HER)	116	16%
RESIDENTIAL HOME ENERGY ASSESSMENT (HEA)	89	12%
APPLIANCE RECYCLING	16	2%
RESIDENTIAL MARKETPLACE REBATES AND DISCOUNTS	14	1%
HVAC AND WATER HEATING (RESIDENTIAL)	2	< 1%
RESIDENTIAL INSULATION AND WINDOWS	1	< 1%
ENERGY STAR APPLIANCES	1	< 1%

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Further analysis was conducted on this customer sample to determine the impact of consumption for customers who enrolled in energy savings services, compared to those in the pilot who did not. Data was examined for electric and gas customer consumption over a period of 12 months before and 12 months after EWR enrollment to measure the impact of EWR participation on consumption. The analysis indicated that over 24 months, nearly 50% of gas and electric customers showed a reduction in consumption when compared to the previous period without enrollment in an energy savings program. However, due to the sample size, it is challenging to draw definitive conclusions without a more comprehensive study.

PIPP One Time Consumers Energy Program Implementation Expense:

4,000 Labor Hours

\$310,000 Labor Expense

The Company incurred an operational and maintenance (O&M) cost of \$310,000 to establish the program, involving team members from both technical and business units. The technical team logged nearly 2,500 hours of specialized labor to perform work on the SAP systems and related programming across multiple platforms. These upgrades included enhancements to the Company's billing systems to ensure compliance with eligibility requirements. Additionally, the technical team upgraded the agency portal; CE PASS is the Consumers Energy portal designed for agency self-service, providing agencies with access to program enrollment options and information. It allows agencies to view customer billing details, place payment holds to prevent service disconnection due to pending program enrollment or assistance and offers various other useful tools.

A specialized technical team skilled in user acceptance testing recorded 950 hours to ensure program feasibility. The business unit tracked an additional 600 hours dedicated to planning

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the pilot, collaborating on EWR, and creating the necessary agency tracking documents and tools to ensure transparency between the utility and the enrolling agencies. The specific categories of work are detailed in Figure 23. The overall expense was a combination of labor and business unit average hourly rates. The Company did not incur any new software or vendor costs associated with establishing the program’s infrastructure.

Figure 23: PIPP One-Time Consumers Energy Expense Categories

PIPP One - Time Expenses	
➤ IT Program Implementation and Pilot Planning	<ul style="list-style-type: none"> ✓ Integration into company billing system ✓ Updates to the customer bill ✓ Creation of program compliance criteria ✓ Developed action plans across multiple teams
➤ New Customer Communications	<ul style="list-style-type: none"> ✓ Developed six new customer communications ✓ Collaborated with EWR team for education and outreach material
➤ Agency Portal Updates (CE Pass)	<ul style="list-style-type: none"> ✓ Added PIPP Drop Down for Agency Use
➤ Agency One Pager and Communications	<ul style="list-style-type: none"> ✓ Training Guides for Agency Deployment ✓ Power BI Automated One-Pagers to align on program metrics
➤ User Acceptance Testing	<ul style="list-style-type: none"> ✓ Extensive user testing to ensure program functioned as designed

PIPP Ongoing Program Maintenance Consumers Energy Costs:

780 Labor Hours	\$37,000 Labor Expense
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Over the two-year pilot period analyzed, the total labor amounted to 780 hours, costing the Company nearly \$37,000. The team cumulatively tracked 3 labor hours per day among 4 team members, maintaining consistency throughout the program, regardless of the number of enrolled customers. The ongoing management of PIPP involved daily account monitoring, agency consultations, and reviewing one-pager forms. These reviews included aligning program funding, reconciling expenditures against forecasts, and responding to customer inquiries. At least bi-weekly, the team updated one-pagers, which were then reviewed and communicated to the administering PIPP agencies.

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PIPP Pilot Operating Costs: The Company's cost to operate the PIPP pilot is detailed in Figure 24. There were no expenses related to PIPP that were funded by ratepayer dollars, which differs from other PIPP pilots conducted in Michigan. The pilot technical integration was funded by Company voluntary refund mechanism (VRM) dollars. The unspent VRM dollars were refunded back to customers as part of Case No. U-20932.⁴⁸ The enrollment program funding was not recovered in rates as it was investor funded. Enrollment targets were conservatively forecasted to ensure program sustainability, considering potentially unforeseen economic and environmental factors. Maintaining close contact with agency partners was crucial in determining when to close enrollments to the program. As the pilot was to be measured within a two-year timeframe, it was essential to end enrollments to ensure an appropriate pilot end date. The final program enrollment was capped at 722 enrollees, a number the Company was comfortable with considering the forecasted gap and arrears of the customer profiles entering the program. The program ended well under the forecasted rate case spend due to conservative forecasting and program de-enrollments. An observation was made indicating that winter weather temperatures in 2023 and 2024 were above average, resulting in less consumption and program spend. Each agency was granted \$175,000 in contingency funds for pilot program overages. At the end of the pilot in January 2025, both agencies reported full contingency fund dollars and an enrollment funding surplus. As previously reported, the source of the remaining program dollars were Company investor funds. The Company will continue to partner with agencies in the future on the best utilization of remaining program dollars to best serve vulnerable customers.

⁴⁸ U-20932 Request to refund VRM & Approval of VRM customer refund
<https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/0688y000007KBYKAA4>

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Figure 24: PIPP Program Enrollment Expense

Program Enrollment Expense		
FY23 Enrollments	\$1,100,000	Annual
FY24 Enrollements	\$1,100,000	Annual
FY25 (Oct 24 – Jan 25) Enrollments	\$187,000	Annual
Total Enrollment (Arrears + Gap)	\$2,387,000	
Program Completion Cost with Enrollment		
Total Enrollment (Arrears & Gap)	\$2,387,000	
IT Costs	\$310,000	One-Time
Maintanece Costs	\$37,000	One-Time
Agency Admin Expense	\$350,000	One-Time
Agency Contingency	\$350,000	One-Time
Total Program Cost	\$3,434,000	
Remaining Agency Program Dollars*	-\$379,541	
Remaining Agency Contingency**	-\$350,000	
Total Program Expense (Enrollment and Program	\$2,704,459	

*Program dollars remaining with agency after completion of pilot for all customers

**Unspent contingency funds remaining with agencies

MEAP & Utility Credit Comparison: Aside from MEAP supported APPs, the Company has other credits that assist low-income customers. To understand the cost and breadth of energy assistance options, we'll discuss these next.

Approximately 83% of identified low-income customers receive a RIA credit, while the remaining 17% receive a LIA credit. Approximately 130,000 active unique low-income customers, including gas, electric and combination commodity services, are deemed eligible for RIA, having met the low-income eligibility criteria. Low Income Eligibility refers to customers whose income is below 150% of the FPL. Additionally, it includes those who have

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participated in assistance programs like SER, HHC, MEAP, SNAP, and/or Medicaid within the past 12 months, or who have self-attested their status, subject to review by the Company.

The current RIA commodity allocation forecasts are as follows:

- RIA Electric: \$8 per month
- RIA Gas: \$15 per month

Approximately 16,000 customers are identified as eligible for the LIA credit, having met the eligibility criteria. In contrast to RIA, the number of customers receiving LIA is capped by a predetermined customer count as reflected in rate case filings. The current LIA credit commodity allocations are as follows:

- LIA Electric: \$30 per month
- LIA Gas: \$30.27 per month

The LIA credit is allocated to customers in the following order based on budget availability. The credit and remaining funds are applied to customer accounts in the following order:

- Critical Care customers
- Participants enrolled in the CARE MB Program
- Customers who received MEAP
- MEAP payment in the last 12 months
- Customers who received a HHC in the last 12 months
- Customers who received SER in the last 12 months

Figure 25 provides a comparison of the ratepayer cost by commodity per program type, illustrating the monthly and annual impact per program.

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Figure 25: Cost to the customer for RIA, LIA, MEAP, PIPP

Bill Impact of Energy Assistance Programs
Current State

<u>Program</u>	<u>RIA</u>	<u>LIA</u>	<u>MEAP</u> ¹	<u>PIPP</u> ²	<u>TOTAL</u>
Electric ^{3,4,5}					
Amount in Rates	\$2,814,067	\$779,430	\$19,892,602	-	-
Residential Electric Customer Count	1,649,470	1,649,470	1,649,470	-	-
Annual Cost to Residential Customers	\$1.71	\$0.47	\$12.06	-	\$14.24
Monthly Cost to residential Customers	\$0.14	\$0.04	\$0.87	-	\$1.05
Gas ^{6,7,8}					
Amount in Residential Rates	\$9,002,357	\$3,164,573	-	-	-
Residential Gas Customer Count	1,690,275	1,690,275	1,690,275	-	-
Annual Cost to Residential Customers	\$5.33	\$1.87	-	-	\$7.20
Monthly Cost to residential Customers	\$0.44	\$0.16	-	-	\$0.60

1) MEAP is funded through (electric only) surcharge which is \$0.87. 75% of the funding is collected back to CE for CARE program for FY24.

2) PIPP was funded by Company investor dollar. PIPP was not funded by ratepayers.

3) 51.5% of the total Electric RIA revenue requirement (\$5.5M) is allocated to residential rates, which equates to \$2.8M.

4) 51.5% of the total Electric LIA revenue requirement (\$1.5) is allocated to residential rates, which equates to \$0.8M.

5) Electric revenue requirements are distributed based on residential customers' percentage of the Cost of Service.

6) 72.6% of the total Gas RIA revenue requirement (\$12.4M) is allocated to residential rates, which equates to \$9.0M.

7) 72.6% of the total Gas LIA revenue requirement (\$4.4) is allocated to residential rates, which equates to \$3.2M.

8) Gas revenue requirements are distributed based on residential customers' percentage of the Cost of Service.

The customer surcharge for the Michigan LIEAF can increase from the current \$0.87 to up to \$2.00 by the year 2029 and increase by the percent change in the Consumer Price Index each year thereafter. This adjustment is in accordance with Michigan Public Acts 168, 169, 170, and 198, which were approved by lawmakers in late 2024. Consequently, this increase will elevate MEAP expense for customers.

CARE, LIA, RIA Program Administration:

3,000 Labor Hours

\$143,000 Labor Expense

The Company analyzed the standard annual administrative labor expenses for maintaining the existing energy assistance programs. On average, the Company spends 3,000 hours, totaling \$143,000 annually, to maintain these programs. The administrative maintenance for the RIA and LIA credit programs includes business unit and technical tasks associated with the application of credits. The administrative maintenance for MEAP is more comprehensive,

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involving agency interactions, invoicing, and annual IT programming costs typically incurred with programmatic changes (Figure 26). These ongoing expenses are embedded in the overall O&M for the credit and assistance rate case funding group.

Figure 26: Program Administration Expense

RIA, LIA, MEAP Annual Program Admin Work	
> RIA	✓ Low Income Verification Form Processing
> LIA	✓ Monthly IT Programming
> MEAP	<ul style="list-style-type: none"> ✓ Agency Interactions ✓ One – Pager Development ✓ Invoicing ✓ Customer Inquiries ✓ Annual IT Programming

Program Annual Cost Per Customer: The Company analyzed the average annual cost per customer based on program type as shown in Figures 27 and 28. For payment programs such as CARE, CARE MB, and PIPP, the calculation is based on the arrears and gap payment amounts. The arrears that are carried into the program are divided into equal monthly payments that span over 24 months and forgiven with a payment made by the agency. The gap payment is the accumulated cost between the invoiced amount and the monthly payment plan amount for the customer. The design of PIPP allows for a smaller customer payment amount that is based on the percentage of income. For that reason, the customer payment is lower resulting in a higher gap payment, which is an influential factor in the overall cost of the program.

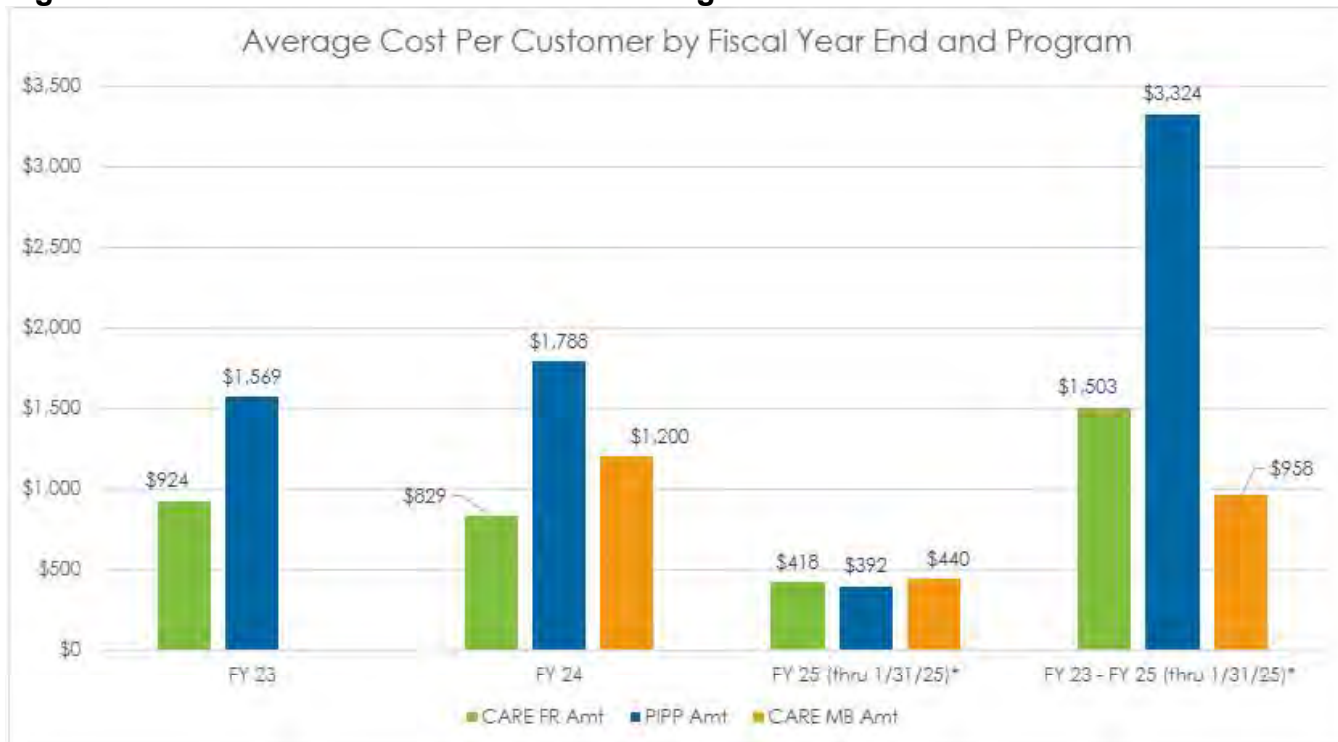
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For the utility credit programs such as LIA and RIA, the annual cost per customer is simply the applicable credit amounts per commodity divided by the number of months in a calendar year.

Figure 27: Annual Cost Per Customer Enrolled Per Program

	CARE	CARE MB	PIPP	LIA	RIA
Annual Cost Per Customer Enrolled Per Program	Electric - \$950 Gas - \$358 Combo - \$882 Overall Avg - \$829	Electric - \$941 Gas - \$576 Combo - \$1478 Overall Avg - \$1,200	Electric - \$1801 Gas - \$612 Combo - \$1856 Overall Avg - \$1,788	Electric - \$360 Gas - \$363 Combo - \$723	Electric - \$96 Gas - \$180 Combo - \$276

Figure 28: Annual Cost Per Customer Per Program Multi Year



As previously mentioned, SER was not a requirement of the PIPP, but it was still highly encouraged by agencies. Customers on PIPP, CARE or CARE MB could receive various types of assistance while enrolled in the program, including SER, HHC, RIA, LIA, and MEAP OTA.

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Participation in supplemental programs in addition to PIPP would help reduce arrears before enrolling in the program, resulting in a lower arrears forgiveness credit. When customers received either RIA or LIA, those credit amounts were applied to the billing usage amount due before gap payment calculations, resulting in a lower gap payment. As part of the program design, PIPP customers received a substantial amount of additional assistance. This design is consistent across all programs, which impacts the cost per customer uniformly. Given that all customers received additional assistance, the amount of arrears a customer held upon enrolling in the program would be reduced. Figure 29, Program Additional Assistance Table, reflects the various types of assistance that customers may have received up to 90 days before enrolling in programs and while enrolled. Any additional assistance received while enrolled in the program will be applied to the oldest arrears. If no arrears exist, the payment is applied to consumption charges, which could change the gap payment.

Figure 29: Program Additional Assistance Table

Program	Customer Count	GAP/AF	SER*	HHC*	MEAP OTA*	LIA**	RIA**
CARE	14116	\$20,425,546	\$4,211,898	\$876,681	\$796,224	\$5,466,511	\$721,392
CARE MB	1059	\$2,039,674	\$673,163	\$51,222	\$88,708	\$90,298	\$142,671
PIPP	722	\$2,399,898	\$290,068	\$69,673	\$69,742	\$473,303	\$58,299

*Totals calculated for duration of 90-days before enrollment to end of program

**Totals calculated for duration of program from enrollment to de-enrollment

Key Outcome Metrics: Several data points were reviewed as part of this analysis. Additional data outcomes are shown below in Figure 30. Additionally, a comprehensive data set is available for reference in Appendix K.

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Figure 30: Key Program Outcome Metrics

Key Program Outcome Metrics							
	CARE	CARE MB Pilot	PIPP	LIA	RIA	Non-Low-Income	Low Income
Program Enrollment Count	14118	1069	722	16000	144304	160304	2.7M
Enrollment FPL 20-75%	6262	599	331	Not Available	Not Available	Not Applicable	Not Available
Enrollment FPL 76-100%	4803	325	217	Not Available	Not Available	Not Applicable	Not Available
Enrollment FPL 111-150%	3051	145	174	Not Available	Not Available	Not Applicable	Not Available
Program Annual Cost	\$829	\$1,200	\$1,788	Electric - \$360 Gas - \$363 Combo - \$723	Electric - \$86 Gas - \$180 Combo - \$276	Not a Program	Not a Program
On Time Payment Rate: Pre Plan	62%	58%	62%	Not Tracked for this Analysis	Not Tracked for this Analysis	83%	54%
On Time Payment Rate: 1-12 Months	63%	62%	65%			83%	50%
On Time Payment Rate: 13-24 Months	65%	Not Available	69%			83%	57%
Disconnect Rate (within 12 months of program default)	15%	10%	17%	14%	13%	13%	Not Tracked for this Analysis
Disconnect Rate (within 12 months of program after successful gratiation)	8%	Not Available	Not Available				
Default Rate (Due to Non-Payment)	19.00%	24.70%	22.00%	Not Available	Not Available	Not Available	Not Applicable
Program Success Percent	81%	75%	78%	Not Available	Not Available	Not Applicable	Not Applicable
CXI Score while on program	73	88	97	Not Available	Not Available	Not Available	Not Available
Consumption (kWh/CCF): Pre Plan	883/8.6	898/8.9	878/8.1	Not Available	Not Available	682/7.1	705/6.9
Consumption (kWh/CCF): 1-12 Months	876/8.5	851/8.8	901/9	Not Available	Not Available	633/6.5	657/6.8
Consumption (kWh/CCF): 13-24 Months	816/7.9	Not Available	873/7.7	Not Available	Not Available	632/5.9	648/6.2

*CARE MB was launched in October 2024 and PIPP closed January 2025.

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9. Customer Satisfaction Survey Results

Customer Experience Index (CXI): Consumers Energy performs Customer Experience Index (CXI) satisfaction surveys to customers through the website or app via three channels: the Customer Service Representative channel, the Integrated Voice Response channel, and the Digital channel. CXI is a metric created by Forrester, which gauges customer satisfaction across various industries including utilities. During the survey, the customer provides an experience rating on a 5-point scale in which all questions receive the same weighting. During this survey experience, the customer is asked questions based on the following criteria:

- Does it meet your needs?
- Was it easy?
- How did it make you feel?

A study was conducted to evaluate CXI scores based on customer satisfaction with the CARE, CARE MB and PIPP Pilot Programs during the duration of the time frame studied as referenced in Figure 31. The surveys taken show customers' overall satisfaction while transacting with Consumers Energy, specifically on their billing and payment experience, not specifically the payment programs in which they are enrolled. The survey results for each program are shown below in Figure 32.

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Figure 31: CXI Scores

Overall CXI for Care, Care MB, and PIPP for Provided Date Ranges:	
CARE	
Enrolled October 1, 2022 - January 31, 2025	
Survey Count	172
CXI	82.27/100
CARE MB	
Enrolled October 1, 2023 - January 31, 2024, October 1, 2024 – January 31, 2025	
Survey Count	3
CXI	100/100
PIPP	
Enrolled October 1, 2022 - January 31, 2025	
Survey Count	12
CXI	100/100

The Company utilizes Forrester⁴⁹ for benchmarking, with the first quartile for utilities being an overall score of 70 and the first quartile for all sectors being an overall score of 80. From a Forrester benchmarking perspective, the scores for all three programs observed are considered optimal. This observation indicates that the CXI scores were optimal for all three programs. However, the very small sample sizes analyzed for CARE MB and PIPP do not fully represent customer satisfaction when compared to the 172 customers who demonstrate their satisfaction while enrolled in CARE.

PIPP/CARE MB Customer Survey

Background: Consumers Energy conducted a PIPP survey using the third-party vendor Qualtrics to gather customer feedback via direct email. Although not required, a separate, similar survey was sent to customers currently enrolled in the Company's CARE MB Program

⁴⁹ <https://www.forrester.com/customer-experience/>

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to provide a comparison. The PIPP survey targeted 411 customers nearing graduation who had valid email addresses. Electronic surveys were distributed on December 4 and 5, 2024, and January 9, 2025, with the initial send on December 4th serving as a test to ensure proper receipt. The CARE MB survey was sent to 1,000 customers currently enrolled in the program to compare with the PIPP survey results.

Survey Design and Administration: The primary objective of this survey was to provide a comparison between the two programs, highlighting what aspects are performing well and identifying areas for improvement. By collecting and analyzing this feedback, the Company aims to enhance the overall effectiveness and satisfaction of both the PIPP and CARE MB Programs, ensuring they meet the needs and expectations of participants. Consumers Energy targeted the following as significant areas of interest:

- Ease of enrollment
- Completion of HEA or upgrade
- Preference of programs
- Program satisfaction

A copy of the PIPP Satisfaction Survey⁵⁰ can be found in the Appendix.

Survey Response Rate: The PIPP survey was distributed to 411 customers and remained open for a week and a half. As illustrated in Figure 32, the survey achieved an overall response rate of 9.97%, with 41 respondents. Similarly, the CARE MB participants survey was sent to 1,000 currently enrolled customers and remained open for the same duration, garnering a response rate of 5.10% with 51 respondents. The industry standard response rate

⁵⁰ Appendix C: PIPP Satisfaction Survey, pg. 95

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for an email survey is typically around 2%. It is important to highlight that the responses provided in this survey were not influenced by any incentives.

Figure 32: Survey Response Results by Program

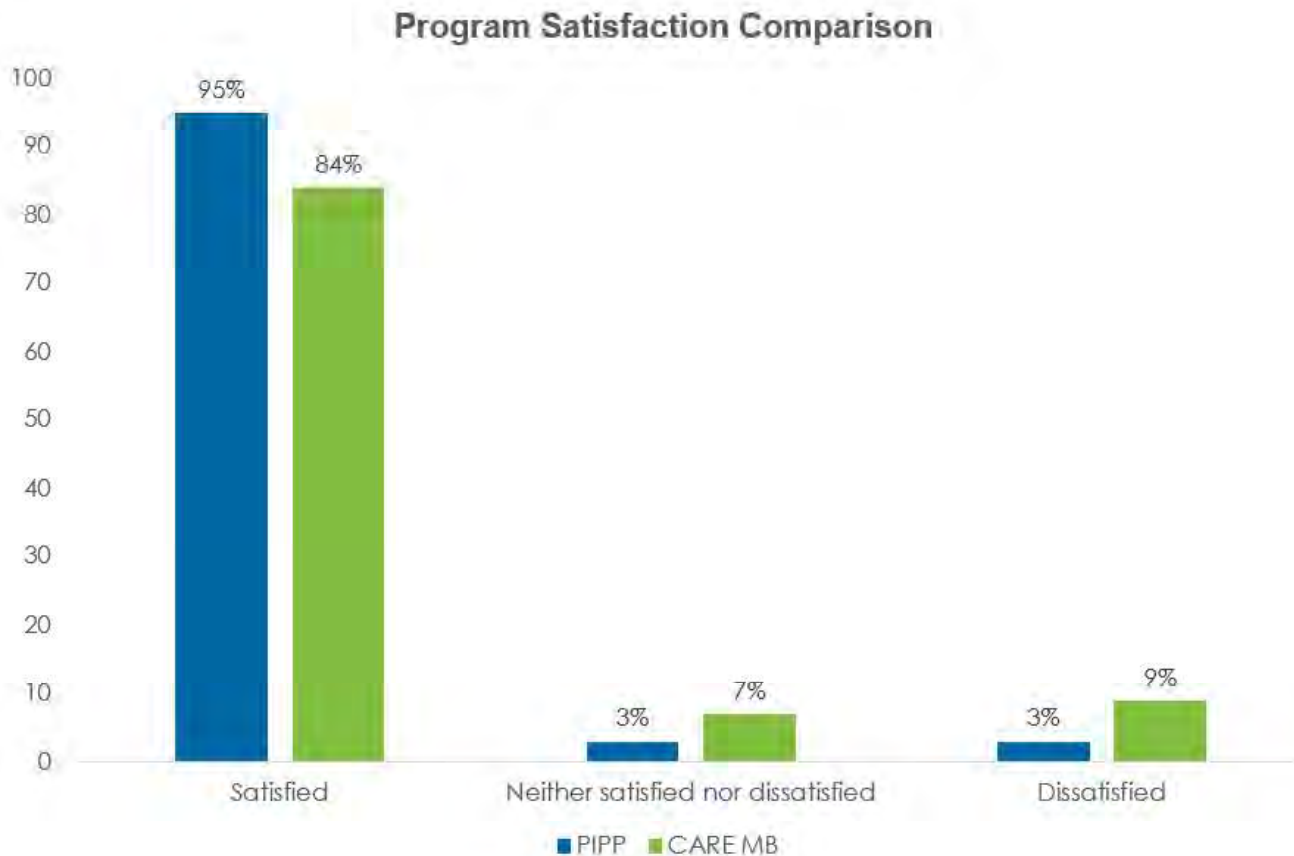
Program	Survey Sent	Surveys Received	Response Rate
PIPP	411	41	9.97%
CARE MB	1000	51	5.10%

Survey Results and Findings: Figure 33 highlights the overwhelming success of the PIPP program, with an impressive 95% of participants expressing high satisfaction. One participant shared, "I'm very grateful for the assistance that I received on this program. I'm a single mother working 40 hrs. a week and sometimes it's hard to keep up on bills and groceries. Thank you for everything." Another commented, "It was very helpful for me, since I'm on a fixed income." Similarly, the CARE MB program also received extremely positive feedback, with 84% of participants expressing satisfaction. Participants remarked, "I just love the CARE MB program so much it's something I can afford in my budget. I plan on applying this year thanks for the program." Another shared, "Helped our family tremendously...", while another simply stated, "Love the program."

These testimonials underscore the profound impact these programs have on individuals and families, providing essential support and relief.

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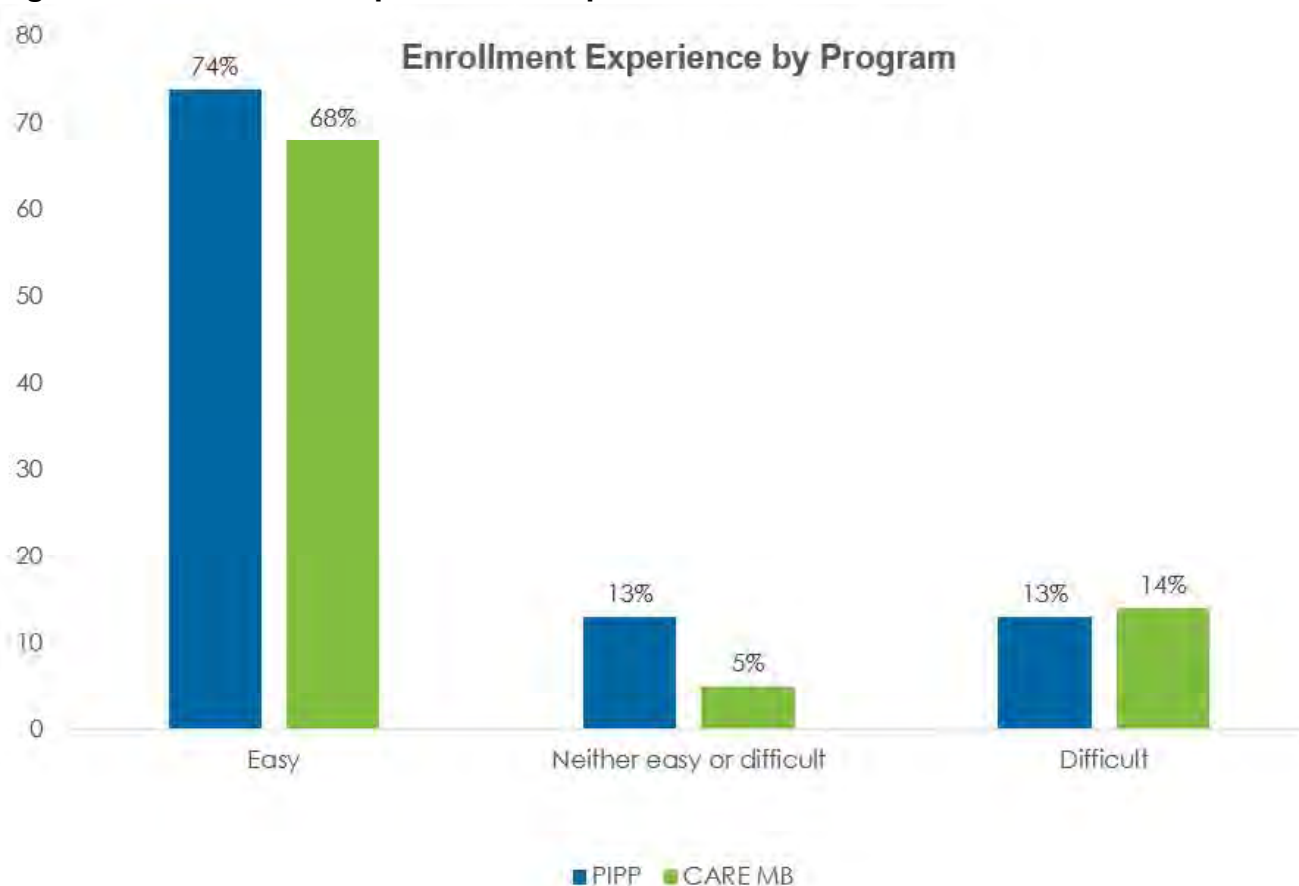
Figure 33: Overall Program Satisfaction Comparison



Enrollment: A significant 74% of participants indicated that the enrollment process for the PIPP program was straightforward, as noted in Figure 34. However, it is important to note that some participants enrolled over 22 months ago, which may impact the accuracy of their recollections. In comparison, 68% of CARE MB program participants reported that the enrollment process was easy. Survey respondents also commented, “I would like to be enrolled again” and “I’m very grateful for the assistance that I received on this program.”

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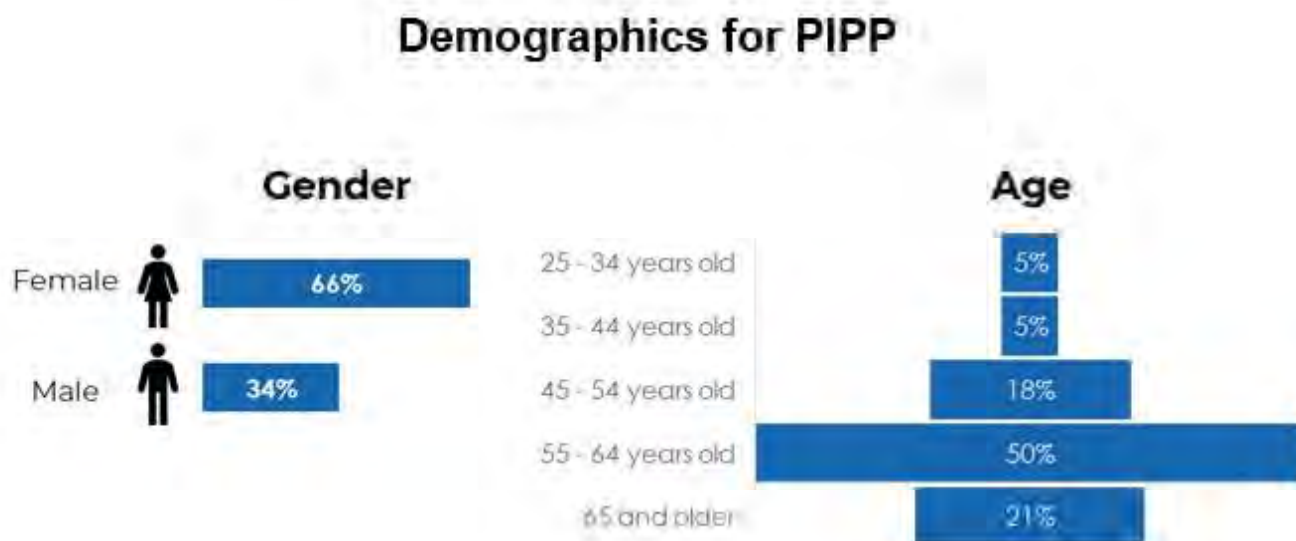
Figure 34: Enrollment Experience Comparison



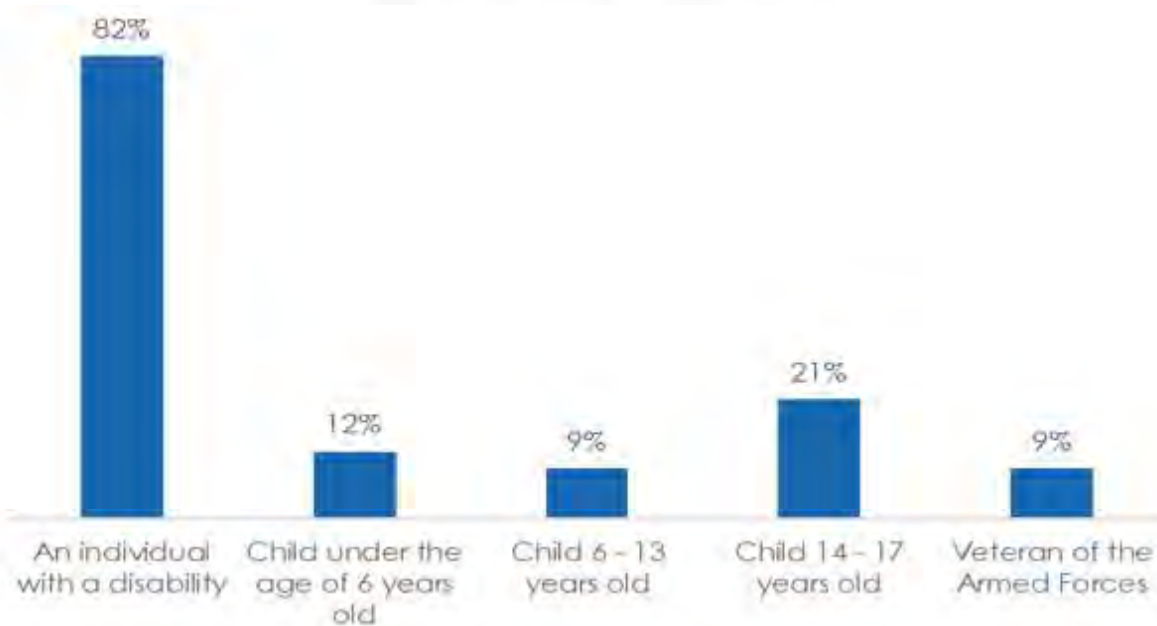
Demographics: The demographic analysis revealed a skew towards female participants and a notable presence of households with a disabled member. Both the PIPP and CARE MB programs demonstrated similar outcomes in their respective evaluations. The average age of PIPP customers is between 55 and 64 years, whereas the average age of CARE MB customers is between 35 and 44 years. See Figures 35 and 36.

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Figure 35: Demographics Comparison PIPP



Household Members



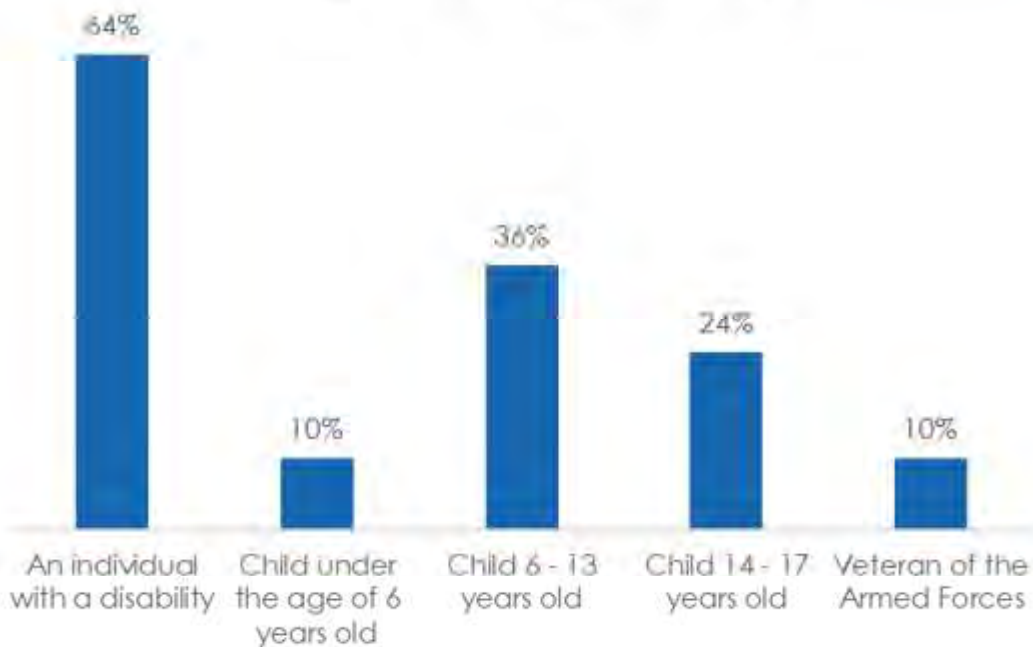
Consumers Energy PIPP Program Report out to MPSC

Figure 36: Demographics Comparison CARE MB

Demographics for CARE



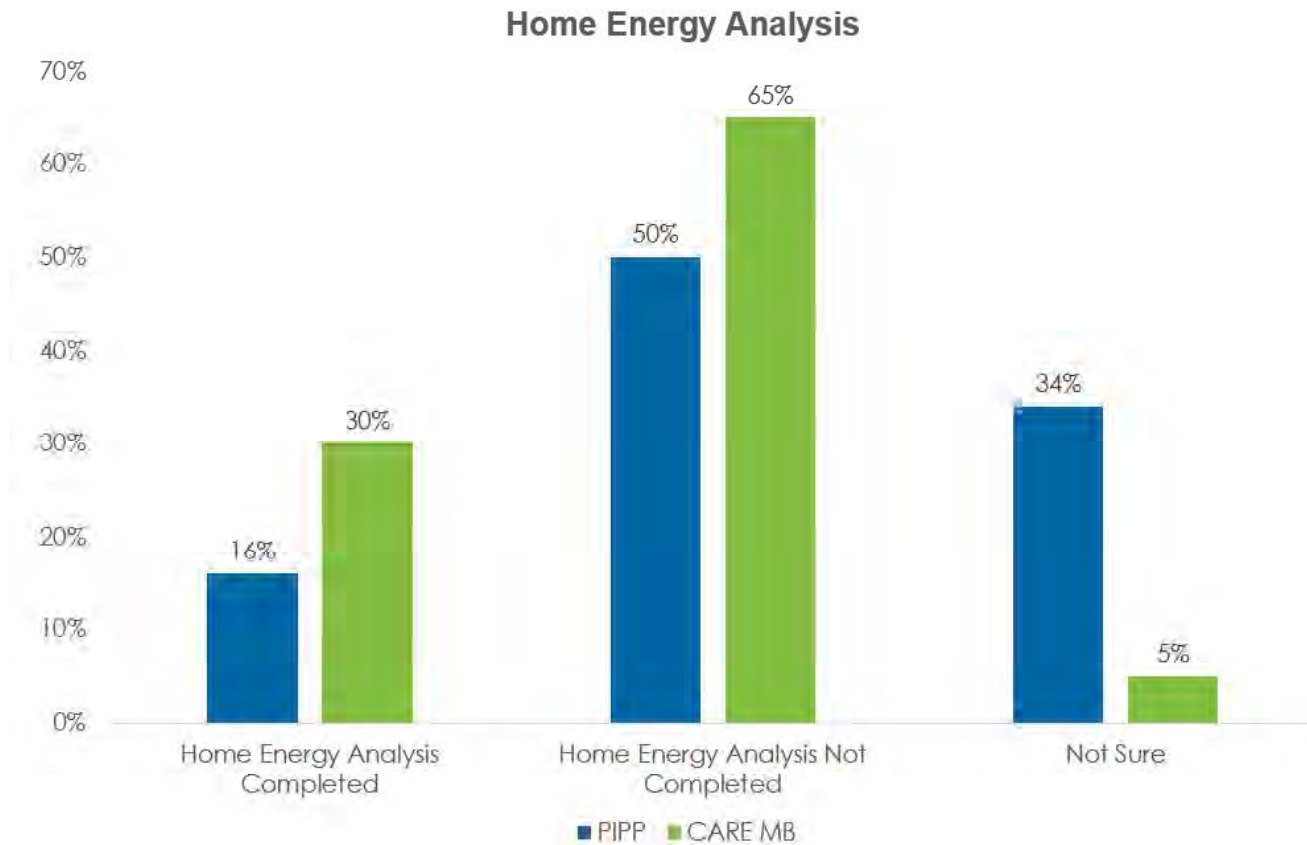
Household Members



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Home Energy Analysis: HEA looks at how your whole home uses energy. We then offer you free product upgrades and a list of ways you can take action to save energy at home. Only 16% of PIPP participants recalled having a HEA compared to 30% that are enrolled in CARE, as identified in Figure 37.

Figure 37: HEA Comparison by Program

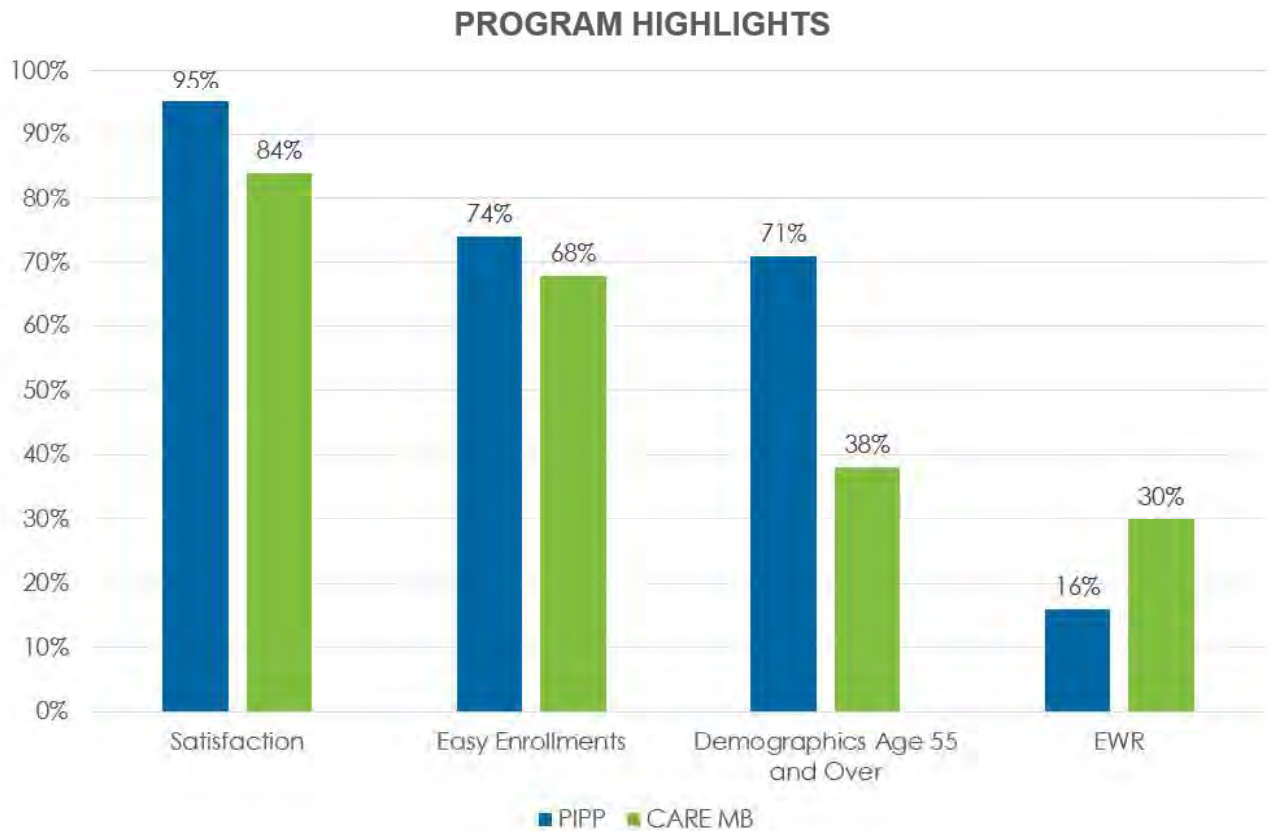


Customer Satisfaction Survey Conclusion: Enrollment in the PIPP was streamlined due to the absence of an SER requirement, which is mandatory for our APP programs. Three-fourths of customers found the PIPP process easy to complete, with the majority being over 55 years old. Similarly, enrollment in the CARE program was also easy, with two-thirds of participants finding the process simple. The demographics for CARE showed a younger customer base,

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primarily in the 35-44 age range, resulting in a more varied household composition compared to PIPP (Figure 38).

Figure 38: Customer Satisfaction Survey Conclusion Highlights



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10. Pilot Recommendation

Program Evolution: Michiganders have been faced with record high inflation over the last several years, and Michigan's December 2024 jobless rate of 5 percent was the largest rate seen in the state since October 2021 at 5.1 percent⁵¹.

The Covid pandemic changed the way many households' function, and additional support dollars such as the Michigan Covid Emergency Rental Assistance and the Michigan Homeowner Assistance Fund ended in 2024. Additionally, assistance was limited in 2024 due to the early depletion of SER funding.

MEAP has supported innovation and partnership among non-profits, energy providers and state agencies that provides indispensable support to low-income households. This program has been a staple in serving low-income households after receiving broad bipartisan support when the program was created in 2012.

In partnership with state partners, collaboratives, and other utilities, the Company took a role in supporting Michigan Public Acts 168, 169, 170, and 198 which will improve and modernize MEAP by expanding program eligibility, increasing available funding, and ensuring equitable access to funding. This four-bill package reached final passage to approved public acts in late 2024, ensuring that the program can continue to be effective for the next decade and beyond for our most vulnerable customers.

The Company understands the importance of reaching those low-income customers that have the greatest need for assistance, as well as the importance of continued progress in the space

⁵¹ <https://www.michigan.gov/dtmb/about/newsroom/all-news/2025/01/23/michigan-unemployment-rate-advances-in-december>

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of EWR. Therefore, in early 2025 the Company implemented a Green Giving Program⁵² that gives eligible income qualified customers the opportunity to earn monthly bill credits while supporting the development of clean renewable energy. Customers enrolled in this program will earn monthly bill credits from the renewable energy the Company generates and sells. The dollars received from the sale will be passed on to the customer as a credit that will reduce their electric bill by at least \$10-\$20 per month. This program has limited availability, and Company experts continue to work with our agency partners that also administer MEAP to grow the program. The Green Giving Program is a state approved program that is funded by internal and external donors to advance clean energy in Michigan.

As MEAP eligibility and program funding will be expanded to better serve our most vulnerable customers with the recent MEAP reform mentioned previously, availability and easy access to programs for moderate income customers is still lacking. According to the Asset Limited, Income Constrained, Employed (ALICE) report⁵³, 28% of Michigan households fall within the ALICE category and these households have not recovered from the Great Recession, a job loss, debt accumulation, or other major challenges.

MEAP and Utility Credits: As previously mentioned, a significant amount of cross-collaborative work over several years has been completed with MEAP to expand access, increase funding, and redesign the program to promote sustainability. Considering the recent program enhancements yet to be realized by the MEAP reform, the Company is in favor of maintaining the current trajectory of MEAP, which is linked with the LIA credit. As described on page 62, LIA credits are prioritized to ensure all CARE MB customers receive the credit. This

⁵² ConsumersEnergy.com/MiGreenGiving

⁵³ Umich.org/Alice-Report

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ensures that the overall monthly payment obligation is reduced, which decreases the agency payment portion. The intent of this strategy is to maximize MEAP funds to ensure more customers can be served by the agencies. The Company also recommends retaining the exiting RIA credit to satisfy the requirements of MCL 460.11(2)⁵⁴ and encourages key stakeholders to consider how the credit strategy could evolve in the future to serve and engage a broader subset of customers to address the identified unmet need as reflected previously in Figure 40.

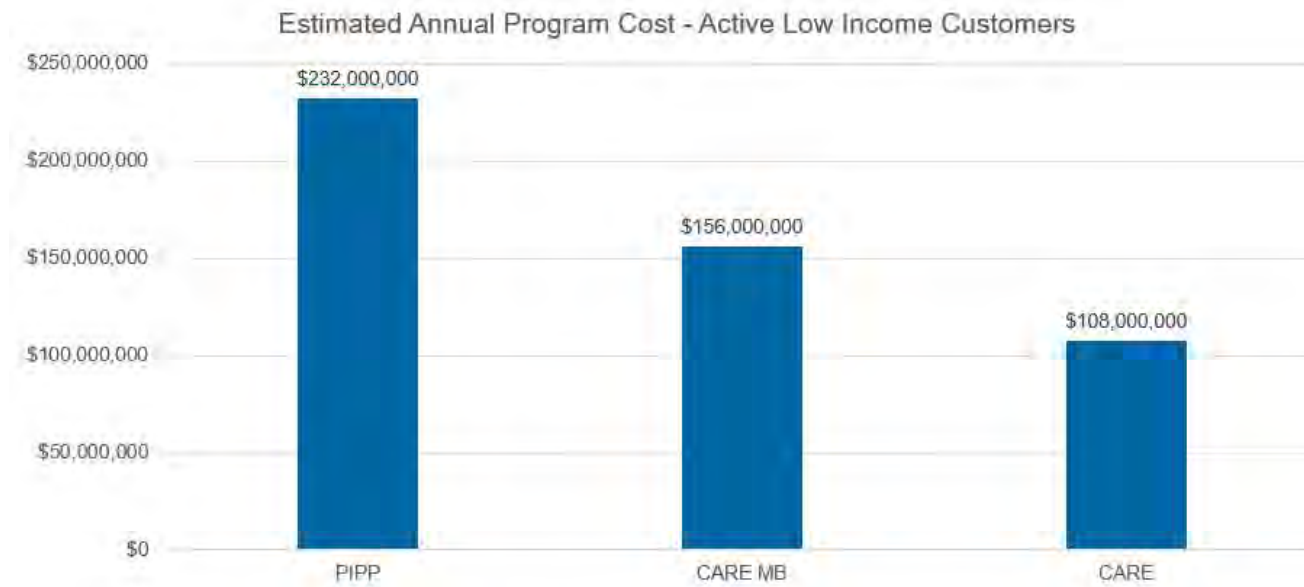
PIPP vs. APP Summary: The PIPP pilot performed by Consumers Energy demonstrated similar performance metrics to CARE and CARE MB. The disconnection rates for non-payment were similar between all programs, with PIPP at 22%, CARE at 19% and CARE MB at 24%. A possible justification for a slightly higher percentage of disconnects for CARE MB would be that during the first few months of the pilot, many Covid related resources and funding had been depleted, and SER fully depleted in June 2024. One major data component demonstrated is the cost per customer. As shown previously in Figure 28, when comparing fiscal years 2023 through 2025, the average cost for a PIPP customer was nearly \$2,366 more than that of a CARE MB customer during that timeframe. The main contributor to the higher program costs points to lower customer payment amount obligations. In a scenario where PIPP would be scaled to all low-income customers in the Consumers Energy service territory, the PIPP would cost an estimated \$805 million annually based on an estimated 450,000 low-income customers within our service territory when utilizing the average cost per customer shared previously in Figure 27.

⁵⁴ <https://www.legislature.mi.gov/Laws/MCL?objectName=mcl-460-11>

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The estimated annual cost to scale the program to serve 130,000 active low-income customers of Consumers Energy is \$232 million. In comparison, the cost for CARE MB is \$156 million, and for CARE, if extended to all active low-income customers, it is \$108 million.

FIGURE 39: Estimated Annual Program Cost – Active Low Income Customers



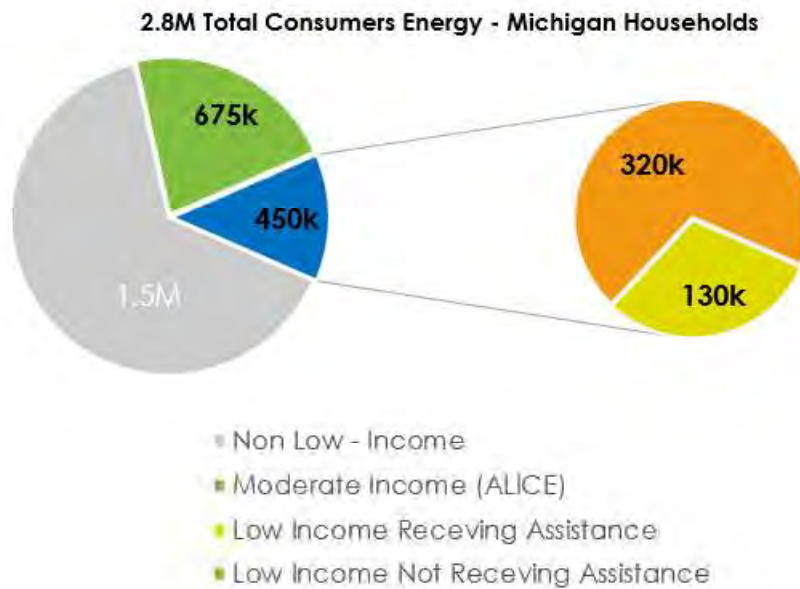
As shown in Figure 25 the actual cumulative cost to the Company and customers of all existing programs with varying enrollment combinations is approximately \$35 million.

The overarching impression is that PIPP performance metrics measure very similarly to CARE and CARE MB, but at an unsustainable cost. Unlike PIPP, the MEAP funded CARE MB has advanced to a modified approach that periodically reconciles customer payments based on consumption. This program design modification was informed by utilities, state partners and community non-profits, achieving customer consumption responsibility and long-term sustainability. Success is achieved through customer consumption awareness and education of EWR products and tactics.

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Unmet Need: The Company strategy is to ensure LMI customers have easy access to energy assistance and payment solutions. In late 2024, the Company performed an analysis to determine the need for LMI customers. Figure 40 demonstrates the unmet need that exists for moderate income customers. By the increase of MEAP eligibility to 60% State Median Income (SMI) with the passage of the new legislation, it's expected that 60% more customers could be served with assistance options. However, the moderate or ALICE customers remain with limited assistance options.

Figure 40: Unmet need for LMI Customers



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Recommendation: Based on the comprehensive data analysis, the Company recommends not proceeding with the PIPP pilot. Analyzing the program design data revealed no substantial improvements that would justify abandoning the current MEAP structure. Instead, the Company advocates maintaining the existing programs, striving for stability and continued efficiency, and continuing to seek opportunities to better serve ALICE and moderate-income customers. This recommendation is grounded in several compelling reasons:

- **Cost Efficiency:** Funding a new program requires significantly higher investment for potentially similar outcomes, making it more cost-effective to enhance and optimize existing programs. The PIPP pilot had the highest cost per customer across all programs.
- **Similar Program Performance Outcomes:** Data points measured resulted in similar outcomes across PIPP, CARE and CARE MB.
- **Reduced Disruption:** Maintaining the status quo avoids the disruptions and uncertainties that can come with new program launches, ensuring a stable and predictable environment for customers.
- **Trust and Reliability:** Consistent and reliable programs build trust and loyalty, as customers know what to expect and can depend on the quality of service.
- **Resource Efficiency:** Enhancing existing programs often requires fewer resources than developing new ones, allowing for more focused and effective improvements. Time and funding spent training on and developing new programs can be allocated to fine tuning existing ones.
- **Consumption Awareness:** Payment reconciliations in CARE MB promote consumption awareness, whereas the PIPP design does not support this element.

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- **Addressing Known Issues:** Refining current programs allows for the resolution of existing problems, leading to a more polished and effective service.
- **Streamlined Experience:** A consistent approach provides a smoother and more straightforward experience for customers, minimizing confusion and enhancing satisfaction.

Expertise Development: By focusing on existing programs, the Commission, energy assistance workgroups, community agency partners, CAA's and utilities can become experts in programs, offering superior service and support.

In light of the numerous policy changes and new program implementations over the past few years, our customers have faced significant challenges in understanding and navigating states offerings. Wholesale changes to program design adds stress for customers trying to navigate the system. By choosing to fine-tune and perfect our current programs rather than introducing new ones, we prioritize our customers' ease and satisfaction. Consistency and clarity are paramount for building trust and loyalty, and by becoming experts in our existing programs, we can provide a more streamlined and reliable experience. This approach allows us to address any existing issues comprehensively, ensuring that our customers receive the highest quality service without the confusion and frustration that often accompanies frequent changes.

Ultimately, focusing on enhancing what we already have will lead to greater customer satisfaction and a stronger, more dependable relationship with our clientele.

Consumers Energy envisions a future where sustainable programs are readily accessible to both low and moderate-income customers. To achieve this, the company advocates for ongoing collaborative problem-solving involving the Commission's Energy Affordability and Accessibility Collaborative, the Affordability Alignment and Assistance Subcommittee, the

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Commission, and agency partners. This collaboration aims to continuously evaluate needs and develop energy assistance solutions that adapt to inflation and economic conditions. This united effort strives to ensure that all vulnerable customers can benefit from sustainable energy solutions and achieve fair access to energy.

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Appendix A – MPSC News Release



Gretchen Whitmer, Governor
 Dan Scripps, Chair
 Tremaine Phillips, Commissioner
 Katherine Peretick, Commissioner

NEWS RELEASE

Twitter: @MichiganPSC
 www.michigan.gov/mpsc

FOR IMMEDIATE RELEASE Feb. 3, 2022
Media contact: [Matt Helms](#) 517-284-8300
Customer Assistance: 800-292-9555

MPSC marks progress on collaborative efforts to better address energy affordability and assistance

The Michigan Public Service Commission today noted progress in its efforts to address energy access and affordability issues amid the coronavirus pandemic, extending the work of the MPSC's Energy Affordability and Accessibility Collaborative for an additional two years, directing utilities to continue reporting monthly data on customer shutoffs and arrearages, and approving up to two low-income energy policy summits to be held this year ([Case No. U-20757](#)).

The MPSC began the ongoing work of reexamining energy affordability and assistance issues in 2020 as COVID-19 began disrupting lives and the economy. Building on work to better understand energy assistance needs and best provide help, Commissioners in February 2021 directed MPSC Staff to convene an Energy Affordability and Accessibility Collaborative in coordination with the MPSC's Energy Waste Reduction and Low-Income Workgroup to address recommendations in the Commission's ongoing work on its response to the pandemic, affordable energy bills, and issues related to data collection and communication and engagement.

Staff filed an [interim report](#) on progress and recommendations Dec. 17, and the Commission today noted some of the Collaborative's accomplishments so far. They include [launching a public database](#) with data updated monthly on [utility customer shutoffs and arrearages](#), and creating an [energy assistance outreach toolkit](#) with materials including brochures, postcards, example letters, example social media messages, and video message files translated into multiple languages. The toolkit was distributed in December 2021 to advocacy groups and other stakeholders to help spread awareness of energy assistance programs.

The Commission took several steps today, including:

- Directing Staff to hold up to two low-income energy policy summits in 2022, with details about the timing and agendas for the summits to be determined.
- Encouraging Staff to coordinate its efforts with access and affordability work being done by the Governor's Poverty Task Force, the Governor's Council on Climate Solutions, and the Council on Future Mobility and Electrification, helping develop cohesive policies across state agencies.

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- Directing Staff to file an interim report detailing the progress, challenges posed, and recommendations of the EAA Collaborative by Dec. 16, 2022, and directing rate-regulated utilities to continue filing monthly reports detailing data on service disconnections and bill arrearages for occupied and unoccupied residences.
- Accepting the Staff's recommendation to work to broaden representation of historically marginalized communities in the collaborative, saying that diversity in representation correlates to diversity of input, experience, knowledge, and ideas to best assist communities with high energy burdens. Staff will ensure the Collaborative works in tandem with the MPSC's diversity, equity and inclusion initiative to increase the diversity of representation in the collaborative.
- Adopting the Staff recommendation that investor-owned utilities continue filing monthly shutoff and arrearage data reports in until further notice.

MPSC APPROVES CONSUMERS ENERGY PILOT PROGRAM FOR LOW-INCOME HOUSEHOLDS STRUGGLING WITH UTILITY BILLS

The MPSC today approved a two-year pilot program in which low-income customers of Consumers Energy Co. will be provided both energy bill assistance and access to programs and education to help them reduce energy waste and lower their monthly bills ([Case No. U-21021](#)). Consumers' percent of income payment plan (PIPP) pilot program's goal is to gauge the effectiveness of percentage of income-based payment plans compared to existing programs at assisting low-income customers in arrears on their energy bills. The pilot will begin Oct. 1, 2022, and will target for enrollment a maximum of 1,500 customers who get natural gas, electric or both from Consumers. Qualifying participants will be placed on a fixed payment plan equivalent to 6% of gross income, with the difference in monthly bills covered by a PIPP credit, with arrears forgiven over the term of the pilot. The Commission's order also directs Consumers to automatically assess PIPP pilot participants for potential energy waste reduction services and measures, including weatherization, to help them improve energy efficiency and lower their bills. The projected \$4.5 million cost of the pilot, including \$1 million in information technology costs, will not impact customer rates.

MPSC APPROVES MEASURES ALLOWING CODE OF CONDUCT WAIVERS AS TEC FIBER SEEKS TO EXPAND OF BROADBAND IN MICHIGAN'S THUMB

The MPSC today approved Code of Conduct waivers sought by Thumb Electric Cooperative of Michigan, doing business as TEC Fiber, which seeks to provide high-speed broadband internet service to unserved and underserved rural areas of Michigan ([Case No. U-21161](#)). TEC Fiber indicates Thumb Electric Co-op will deploy a fiber ring that connects utility substations to foster a smarter electric grid; TEC Fiber created a broadband division within its corporate structure to lease fiber from the co-op to provide broadband and voice phone services to its members. TEC Fiber sought a waiver of several Code of Conduct provisions designed to prevent anticompetitive behavior or subsidization of the business of affiliates. The Commission's order approves with the exceptions of R 460.10103(1) and (3), which the Commission denied as unnecessary. The Commission also directed TEC Fiber to include, in its annual report to the MPSC, a detailed accounting of its business activities and expense allocation related to the

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waivers approved today.

MPSC GRANTS REHEARING BUT DENIES CONSUMERS ENERGY'S BID FOR RECONSIDERATION OF DISALLOWED COSTS IN 2019 PSCR RECONCILIATION

The MPSC today granted Consumers Energy a rehearing on a disallowance on \$71,191 in replacement power costs associated with an outage at its Ludington pumped hydroelectric facility, but denied the company's request to allow the cost or reopen the utility's reconciliation of its power supply cost recovery expenses for the 2019 calendar year, which the Commission approved in October 2021 ([Case No. U-20220](#)). The Commission also rejected a petition by the Residential Customer Group for a rehearing of the Commission's decisions in the case concerning the Jackson and Zeeland laterals, gas management agent costs, and biomass merchant plants.

To look up cases from today's meeting, access the [MPSC's E-Dockets filing system](#). Watch recordings of the MPSC's meetings on the [MPSC's YouTube channel](#).

For information about the MPSC, visit www.michigan.gov/mpsc, sign up for its [monthly newsletter](#) or other [listservs](#), or follow the Commission on [Twitter](#) or [LinkedIn](#).

DISCLAIMER: This document was prepared to aid the public's understanding of certain matters before the Commission and is not intended to modify, supplement, or be a substitute for the Commission's orders. The Commission's orders are the official action of the Commission.

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Consumers Energy PIPP Program Report out to MPSC

Appendix B – Acronyms

AAA	<p>Affordability, Alignment, and Assistance, Subcommittee</p> <p>In MPSC Case No. U-20757, the MPSC directed formation of an Energy Affordability and Accessibility Collaborative, which formed and assigned tasks to the AAA subcommittee. The AAA is currently tasked with determining the best fulfillment of MCL 460.11(2) by analyzing the current fulfillment of the statute and comparing the PIPP pilots against the current MEAP offerings.</p>
ACEEE	<p>American Council for an Energy-Efficient Economy</p> <p>The American Council for an Energy-Efficient Economy (ACEEE), a nonprofit research organization, develops transformative policies to reduce energy waste and combat climate change. With our independent analysis, we aim to build a vibrant and equitable economy – one that uses energy more productively, reduces costs, protects the environment, and promotes the health, safety, and well-being of everyone.</p>
ALICE	<p>Asset Limited, Income Constrained, Employed</p> <p>The ALICE population refers to households that are Asset-Limited, Income-Constrained, and Employed. These households earn above the Federal Poverty Level but still struggle to afford basic necessities like housing, childcare, food, transportation, health care, and technology. ALICE households are working families that are just above the poverty line but not earning enough to cover the cost of living in their communities.</p>
APP	<p>Affordable Payment Plan</p> <p>An affordable payment plan allows customers to help pay their bills at a fixed rate. Utilities in MI have a different name for their APP, the name for Consumers Energy's APP is CARE.</p>
APPRISE	<p>Applied Public Policy Research Institute for Study and Evaluation</p> <p>APPRISE is a nonprofit research institute dedicated to collecting and analyzing data and information to assess and improve public programs. APPRISE research focuses on programs that provide bill payment assistance, energy education, energy efficiency services, and renewables to low-income households; and programs that provide incentives for undertaking energy efficiency projects to residential, commercial, and industrial utility customers.</p>
BCAEO	<p>The Bureau of Community Action</p> <p>One of 9 enrolling MEAP agencies.</p>
BCUW	<p>Barry County United Way</p> <p>One of 9 enrolling MEAP agencies.</p>

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CA	<p>Crisis Assistance</p> <p>A program that is offered when a customer is past due on a utility bill, has service shut off or has 25% remaining in their propane tank. Ex. State Emergency Relief (SER) program.</p>
CARE	<p>Consumers Affordable Resource for Energy</p> <p>CARE is Consumers Energy's MEAP, funded by LIEAF and LIHEAP. DHHS is the lead agency responsible for administration of funds for this public program. CARE is a 24-month affordable payment plan. The plan offers an affordable fixed monthly bill (based on FPL), and past due balances will eventually be forgiven over 2 years, rewarding the on-time payments. This program helps customers to build good payment behaviors and has an 85% success rate with <15% disconnection rates (2022).</p>
CARE FL	<p>Consumers Affordable Resource for Energy - Flat-Rate</p> <p>CARE Flat Rate (FR) provides flat-rate monthly bills for income qualified customers who have received an energy-related State Emergency Relief (SER) payment from DHHS. This 24-month program locks in a flat rate bill and gradually forgives arrearage in proportional 1/24th increments as a reward for on time payments. On October 1st, 2024, new CARE customers will be enrolled in the newly redesigned CARE Modified Budget (MB) program.</p>
CARE MB	<p>Consumers Affordable Resource for Energy - Modified Budget</p> <p>This program functions very similarly to CARE but customers may not benefit from this CARE MB model as they would from CARE Flat Rate. The MPSC has requested that participating utilities change their APP to a "modified budget" plan. Customer monthly payment amount can change based on consumption after budget review after 6, 12, and 18 months in the program.</p>
CE PASS	<p>CE PASS</p> <p>CE PASS is the Consumers Energy portal designed for agency self-service, providing agencies with access to program enrollment options and information. It allows agencies to view customer billing details, place payment holds to prevent service disconnection due to pending program enrollment or assistance and offers various other useful tools</p>
CERA	<p>COVID Emergency Rental Assistance</p> <p>CERA can provide rental and utility assistance for eligible renter households so they can retain their housing stability. The CERA program is administered by the MSHDA through its network of local nonprofit agencies (began March 2021). Funds are now depleted, and we are not enrolling customers into this program.</p>
CSR	<p>Customer Service Representative</p> <p>The Customer Service Representatives (CSR) works in the delivery of customer assistance in a Contact Center office environment. Required to respond to customers'</p>

Consumers Energy PIPP Program Report out to MPSC

	requests for assistance under tight time constraints, and often immediately for emergency calls, in an efficient and knowledgeable manner. They work in accordance with Company policies and routine customer problem resolution; and they resolve customer issues by applying their knowledge, experience, and judgment.
EAAC	<p>Energy Affordability and Accessibility Collaborative</p> <p>The Energy Affordability and Accessibility Collaborative (EAAC) seeks broad and diverse input from residents, non-profits, utilities, and state agencies to address equity, the affordability of energy, access to low-income energy assistance, customer protections and low-income energy waste reduction services. The EAAC's work results from the Case No. U-20757 order issued February 18, 2021, when the Commission directed Staff to convene the EAAC in coordination with the Energy Waste Reduction Low Income Workgroup. The work takes place in subcommittees and the Low-Income Energy Policy Board.</p>
EWR	<p>Energy Waste Reduction</p> <p>The cheapest energy is the energy you do not use. For every dollar spent on energy efficiency programs, customers will save around \$4 in avoided energy costs. Since 2009, Michigan's utility providers have helped customers save almost \$6 billion in electric costs and close to \$2 billion in natural gas costs.</p>
FIP	<p>Family Independence Program</p> <p>DHHS program that provides temporary cash assistance to families with children and pregnant women to help them pay for living expenses such as rent, heat, utilities, clothing, food and personal care items. FIP recipients automatically qualify for WAP.</p>
FPL	<p>Federal Poverty Level</p> <p>The U.S. Federal poverty level is a measure of income the U.S. government uses to determine who is eligible for subsidies, programs, and benefits. Each year, the U.S. Census Bureau uses census data and the Consumer Price Index (CPI) to determine an official poverty measure (OPM). This process weighs household income against costs to determine the minimum amount necessary to afford basic living expenses. The Department of Health and Human Services (HHS) updates the poverty guidelines each January to account for inflation.</p>
HEA	<p>Home Energy Analysis</p> <p>Home Energy Analysis looks at how your whole home uses energy. We then offer you free product upgrades and a list of ways you can take action to save energy at home.</p>
HNP or HN	<p>Helping Neighbors Program</p> <p>Free Energy Saving Upgrades and home energy report for income-qualified customers.</p>
HHC	<p>Home Heating Credit</p>

Consumers Energy PIPP Program Report out to MPSC

	<p>The Home Heating Credit is a way the State of Michigan helps low-income families pay some of their heating expenses if they are a qualified Michigan homeowners or renters. This program is funded by LIHEAP and administered through a tax rider through the Michigan Department of Treasury.</p>
LI	<p>Low Income</p> <p>Customers that fall under 150% of the Federal Poverty Level.</p>
LI Eligibility	<p>Low Income Eligibility</p> <p>Low Income Eligibility refers to customers whose income is below 150% of the Federal Poverty Level (FPL). Additionally, it includes those who have participated in assistance programs like SER, HHC, MEAP, SNAP, Medicaid within the past 12 months, or who have self-attested their status, subject to review by the Company.</p>
LIA	<p>Low Income Assistance Credit</p> <p>Is assistance credit available for select customers who fall under 150% FPL that is recovered through rates.</p>
LIEAF	<p>Low Income Energy Assistance Fund</p> <p>A rate payer funded energy assistance fund. Public Act 95 of the Michigan Public Acts of 2013 established the Low-Income Energy Assistance Fund (LIEAF) charging the Michigan Department of Human Services (DHHS) with expending money from the fund as provided by the Michigan Energy Assistance Act. Public Act 95 allows the Michigan Public Service Commission (MPSC) to annually approve a low-income energy assistance funding factor, not to exceed \$50 million, to support the Low-Income Energy Assistance Fund (LIEAF). This act adds a monthly surcharge on residential electric bills to fund LIEAF.</p>
LIHEAP	<p>Low Income Home Energy Assistance Program</p> <p>A federally funded energy assistance program. Low-income households who meet all State Emergency Relief (SER) eligibility requirements may receive assistance to help them with household heat and electric costs (MEAP). LIHEAP funds are also used for the Home Heating Credit (HHC), administered through the Michigan Department of Treasury and the Weatherization Assistance Program (WAP).</p>
LMI	<p>Low to Moderate Income</p> <p>Customers that fall under the 400% of the Federal Poverty Level.</p>
MDHHS	<p>Michigan Department of Health and Human Services</p> <p>The mission of the U.S. Department of Health and Human Services (HHS) is to enhance the health and well-being of all Americans, by providing for effective health and human</p>

Consumers Energy PIPP Program Report out to MPSC

	services and by fostering sound, sustained advances in the sciences underlying medicine, public health, and social services.
MEAP	<p>Michigan Energy Assistance Program</p> <p>The purpose of the MEAP is to establish and administer programs statewide that provide energy assistance and self-sufficiency services to eligible low-income households. Self-sufficiency services include assisting participants with the following: paying their energy bills on time; budgeting for and contributing to their ability to provide for energy expenses, which may include enrollment into an affordable payment plan (APP); and utilizing energy services to optimize on energy efficiency.</p>
MEAP OTA	<p>MEAP One-Time-Assist</p> <p>A financial assistance program that offers limited help to residential customers. This is a one-time payment and is not intended for ongoing or chronic financial difficulties.</p>
MICA	<p>Moderate Income Customer Assistance</p> <p>A proposed prototype and rebranding of the existing RIA credit. The proposed reallocation would provide eligibility for the CARE MB Plus payment plan for customers with income below 400% of the Federal Poverty Level (FPL) who are above 60% of the state median income (SMI).</p>
MVTF	<p>Michigan Veterans Trust Fund</p> <p>Provides eligible wartime vets and their families in Michigan with temporary energy assistance for emergencies or hardships (ex. Utility bills, home repairs, mortgage assistance).</p>
NEUAC	<p>National Energy & Utility Affordability Coalition</p> <p>A broad-based coalition of diverse member organizations and individuals dedicated to heightening awareness of energy needs.</p>
PIPP	<p>Percentage of Income Payment Plan</p> <p>A 2-year pilot approved by the Michigan Public Service Commission (MPSC) in which low-income customers of Consumers Energy will be provided both energy bill assistance and access to programs and education to help them reduce energy waste and lower their monthly bills. The goal is to gauge the effectiveness of percentage of income-based payment plans compared to existing programs at assisting low-income customers in arrears on their energy bills. The pilot began Oct. 1, 2022, and targets 1,500 customers max who get gas, electric or both from CE. Qualifying customers will be placed on a fixed payment plan equivalent to 6% of gross income with the difference in monthly bills covered by a PIPP credit, with arrears forgiven over the term of the pilot. This is a projected \$4.5 million pilot including \$1 million in IT costs, which will not impact customer rates. DTE's PIPP is recoverable in rates.</p>

Consumers Energy PIPP Program Report out to MPSC

RIA	<p>Residential Income Assistance</p> <p>RIA is a monthly credit that qualifying customers receive either once they receive a state or federal assistance payment or if they apply. \$13.60 for gas, \$8 for electric.</p>
SER	<p>State Emergency Relief</p> <p>SER may help low-income households pay part of their heating or electric bills, assist in keeping utilities in service, or have service restored. The program is available all year long. Call your local Department of Health and Human Services office for information or apply on MI Bridges. Households must apply for SER assistance prior to receiving any MEAP services.</p>
SNAP	<p>Supplemental Nutrition Assistance Program</p> <p>SNAP provides food benefits to low-income families to supplement their grocery budget so they can afford the nutritious food essential to health and well-being.</p>
SNP	<p>Shut-Off for Non-Payment</p> <p>When a customer has not paid their energy bill, they are at risk of being shut off for non-payment. They will receive a notice in the mail to connect them to resources to receive emergency assistance, make a payment plan, receive bill credits or restore interrupted service after the account is paid.</p>
SPP	<p>Shut-Off Protection Plan</p> <p>Utility customers or their spouses, called to full time active military duty by the president or the governor during a time of declared national or state emergency or war, may apply for shut-off protection for electric or natural gas service for up to 90 days. These customers can reapply for extensions. The utility Company may request verification of active-duty status. Customers will still be responsible to pay for all services used during the time of protection. Contact your utility Company to apply.</p>
SVDP	<p>Saint Vincent De Paul</p> <p>One of 9 enrolling MEAP agencies.</p>
TN	<p>True North</p> <p>One of 9 enrolling MEAP agencies.</p>
TPN	<p>Third Party Notification</p> <p>Consumers Energy will send a copy of any shut-off notice the customer receives to a third party, with the customer's written authorization. This may include a consenting friend, relative or agency.</p>

Consumers Energy PIPP Program Report out to MPSC

UWSCMI	<p>United Way of South-Central Michigan</p> <p>One of 9 enrolling MEAP agencies.</p>
WAP	<p>Weatherization Assistance Program</p> <p>A federally funded, low-income residential energy conservation program. The program provides free home energy conservation services to low-income Michigan homeowners and renters. These services reduce energy use and lower utility bills, thus creating more self-sufficient households. Assessment includes inspection for blower door testing for air leakage, combustion appliance testing for safety and efficiency and a health and safety inspection. Households that receive weatherization services can expect heating costs to be reduced 20-25%.</p>
WPP	<p>Winter Protection Plan</p> <p>The Winter Protection Plan (WPP) protects both seniors and low-income customers of MPSC regulated natural gas and electric companies. Customers may find relief from electric or natural gas service shut-off and high utility payments between November 1 and March 31.</p>

Consumers Energy PIPP Program Report out to MPSC

Appendix C – PIPP Customer Survey

PIPP 2024 Survey

Q1 Thank you again for providing feedback on the Percent of Income Payment Plan (PIPP) program. Feedback about your experience with this program will help us identify where things went well and where improvements can be made.

Q2 How easy or difficult was it to enroll in the Percent of Income Payment Plan (PIPP) program?

- Extremely easy
- Somewhat easy
- Neither easy nor difficult
- Somewhat difficult
- Extremely difficult
- Don't remember

Consumers Energy PIPP Program Report out to MPSC

Q3 While enrolled in the Percent of Income Payment Plan (PIPP) program, have you also had a Home Energy Analysis (HEA) done?

- Yes
- No
- Not sure

Q4 For you personally, how helpful was the Home Energy Analysis (HEA)?

- Extremely helpful
- Very helpful
- Moderately helpful
- Somewhat helpful
- Not at all helpful

Q11 Were you previously enrolled in Consumers Energy's Consumers Affordable Resource for Energy (CARE) program?

- Yes
- No
- Not sure

Q12 Do you prefer the Consumers Affordable Resource for Energy (CARE) program or the Percent of Income Payment Plan (PIPP) program?

- Prefer CARE program
- Prefer PIPP program
- They are basically the same
- Didn't like either one

Consumers Energy PIPP Program Report out to MPSC

Q13 Why do you prefer the Consumers Affordable Resource for Energy (CARE) program?

Q14 Why do you prefer the Percent of Income Payment Plan (PIPP) program?

Q5 Overall, how satisfied or dissatisfied are you with the Percent of Income Payment Plan (PIPP) program?

- Extremely satisfied
- Somewhat satisfied
- Neither satisfied nor dissatisfied
- Somewhat dissatisfied
- Extremely dissatisfied

Q6 Do you have any comments on your experience with the Percent of Income Payment Plan (PIPP) program? If not, please click on the arrow.

Q7 Lastly, we would like to gather some information about you and your household to help with the analysis of your survey responses.

Q8 What is your age?

- 18 - 24 years old
- 25 - 34 years old
- 35 - 44 years old
- 45 - 54 years old
- 55 - 64 years old
- 65 and older

Consumers Energy PIPP Program Report out to MPSC Staff

Q10 What is your gender?

- Male
- Female
- Non-binary / third gender
- Prefer not to say


Q15 Are any of the following a member of your household? Please check all that apply.

- Veteran of the Armed Forces
- Child under the age of 6 years old
- Child 6 - 13 years old
- Child 14 - 17 years old
- An individual with a disability
- An adult 65 years or older
- None of the above

Consumers Energy PIPP Program Report out to MPSC Staff

Appendix D – PIPP Communication Letters

PIPP Welcome Letter



DATE

Customer
Address Line 1
Address Line 2

Service Address: 123 MAIN ST. JACKSON MI 49201
Enrollment Date: xx/xx/20xx

Dear [Customer First Name],

Welcome to the Consumers Energy Percent of Income Payment Plan (PIPP)! We're so glad you were able to connect with one of our partner agencies!

PIPP is a two-year pilot program that helps you stay on top of your energy bills with a lower monthly payment. As a participant, you will receive the following benefits:

- **A lower monthly energy bill payment. Based on your income, you will pay \$[xx] each month.** The remaining portion of your monthly energy bill will be paid for by the program.
- **Past due balance forgiven over time.** As you make your monthly payments, any past due balance you had at enrollment will be gradually forgiven.

You will start seeing these changes on your first billing statement after enrolling in PIPP. We have included a sample bill with this letter so you'll know what you can expect to see each month.

Be sure to pay your bill in full and on time so we can continue to offer you these great benefits for the next two years. Non-energy charges are not included in the monthly PIPP credit (e.g. Appliance Service Plan). These fees and charges are still your responsibility while enrolled in PIPP. If you are struggling to pay your bill, please reach out to your enrolling agency.

We recommend the following services to further help you reduce your energy bills:

- Schedule a **FREE** in-home or virtual energy assessment and receive free energy efficiency upgrades that will help reduce your energy costs.
 - o Call 877-448-9433 or visit ConsumersEnergy.com/HelpingNeighbors.
- Apply for the Michigan Home Heating Credit to get money back from last winter's heating costs. Applications can be submitted January through September.
 - o You do not have to file income taxes to qualify or apply for this credit. Learn more by dialing 2-1-1 or visiting MichiganFreeTaxHelp.org.
- Download the Consumers Energy Mobile App. You can view and pay your bill, check an outage status or report a gas leak or outage. Within the app, sign up for eBill and enroll in text or email notifications.

Thank you for starting your journey with the PIPP Program. We look forward to supporting your success!

Sincerely,

Energy Assistance Team
ConsumersEnergy.com/assistance

Explore more assistance programs at ConsumersEnergy.com/assistance.


Consumers Energy PIPP Program Report out to MPSC Staff

Arizona Self-Sufficiency Matrix

	1 - In Crisis	2 - Vulnerable	3 - Safe	4 - Building Capacity	5 - Empowered
Income	No income	Inadequate income and/or spontaneous or inappropriate spending.	Can meet basic needs with subsidy, appropriate spending. Income supports with additional income needs.	Can meet basic needs and manage debt without assistance. Has balanced budget and expenses.	Income is sufficient, well managed; has discretionary income and is able to save.
Employment	No job	Temporary, part-time or seasonal, inadequate pay; few or no benefits.	Employed full-time; inadequate pay; few or no benefits.	Employed full-time with adequate pay and benefits.	Maintains permanent employment with adequate with income and benefits. 1 year or more ongoing
Housing	Homeless or threatened with eviction	In transitional, temporary or substandard housing, and/or current rent/mortgage is unaffordable <small>(equal to 30% of 100% of 30% of income)</small>	In stable housing that is safe but only marginally adequate.	Household is in safe, adequate, subsidized housing.	Household is safe, adequate, unsubsidized housing.
Food	No food or means to prepare it. May be skipping meals and/or suffering significant nutritional deficits	Food and cooking facilities are available but inadequate to meet all nutritional needs or may be temporary (ie: in shelter)	Can meet basic food needs, but requires assistance. Household may be on food stamps or visit pantries.	Can meet basic food needs without assistance.	Can choose to purchase any food household desires.
Health Care	No medical coverage with immediate need.	No medical coverage and great difficulty accessing medical care when needed. Some household members may be in poor health	Some members on health assistance (ie: children on MiChild)	All members can get medical care when needed, but may strain the budget.	All members are covered by affordable, adequate health insurance.
Mental Health	Danger to self and others, reoccurring suicidal thoughts, experiencing severe difficulty in day to day life due to psychological problems	Recurrent mental health symptoms that may affect behavior, but not danger to self/others, persistent problems with functioning due to mental health symptoms.	Mild symptoms may be present, but are transient, only moderate difficulty in functioning due to mental health problems.	Minimal symptoms that are expectable responses to life stressors, only slight impairment in functioning	Symptoms are absent or rare, good or superior functioning in wide range of activities; no more than everyday problems or concerns
Adult Education	Literacy problems and/or no high school diploma/GED are serious barriers to employment.	Enrolled in literacy and/or GED program and/or has sufficient command of English to where language is not a barrier to employment.	Has high school diploma/GED.	Needs additional education or training to improve employment situation and/or to resolve literacy problems to where they are able to function effectively in society.	Has completed education/training needed to become employable. No literacy problems.
Childcare <small>[skip if children not in household]</small>	Needs childcare, but none is available/accessible and/or child is not eligible.	Childcare is unreliable or unaffordable, inadequate supervision is a problem for childcare that is available.	Affordable subsidized childcare is available, but limited.	Reliable, affordable childcare is available, no need for subsidies.	Able to select quality childcare of choice.
Children's Education <small>[Skip if no school-aged children]</small>	One or more eligible children is not enrolled in school.	One or more eligible children enrolled in school, but not attending classes.	Enrolled in school, but one or more children only occasionally attending classes	Enrolled in school and attending classes most of the time.	All eligible children enrolled and attending on a regular basis.

Consumers Energy PIPP Program Report out to MPSC Staff

PIPP Sample Bill



Count on Us®

Need to talk to us? Visit ConsumersEnergy.com
or call 800-477-5050

Hearing/speech Impaired: 800-649-3777

Service Address:
0000 MAIN STREET, ANYTOWN MI

Account: 1111 1111 1111

Account Information

Bill Month: May
Service Dates: 03/25/2022 - 04/25/2022
Days Billed: 32
Portion: 01 05/22

Programs:
PIPP

To help you complete a Home Heating Credit form, here are your 2021 heating costs for 12 months: \$549.47.

We Estimated Your Energy Use
We've been unable to read the meter for multiple months. To avoid estimated bills, enroll in our Customer Read Program.
- Email or text a photo that includes the meter read and meter number to ReportMyRead@consumersenergy.com and include the words "Customer Read Program" in the subject line.
- Create an online account at ConsumersEnergy.com to sign up.
You'll get a monthly postcard reminding you to report your meter read.

Appliance Service Plan

Coverage period 08/17/2022-06/30/2023
ASP WHOLE HOME CARE ** \$599

Total Appliance Service Plan Charges \$599

Gas Residential Service
Rate Code
Meter Information
Your next scheduled meter read is on 07/25/2022.

Gas Service: MR Meter
Meter Number: 99713794
Meter Number: 0000001257718
Beginning Read Date: 03-25
Ending Read Date: 04-25
Beginning Read: 476
Ending Read: 526 (Estimate)
Differential: 50
Constant: 0.1
Correction factor: 1.00000
Usage: 5.0 Mcf
Total Metered Energy Use: 5.0 Mcf

A May Energy Bill Invoice: 601012857251

PIPP Program and Other Charges Summary	
Total PIPP Amount Due from Last Month	\$150.94
PIPP Monthly Plan Amount	\$25.00
Total Other non-Energy Charges	\$46.99
Amount Due:	\$222.93

Natural Gas Charges	
Customer Charge	\$12.60
Gas Distribution	\$22.30
Gas Recovery	\$199.00
Total Gas	\$63.10
State	\$2.57
Total Energy Charges	\$65.62

Other Non-Energy Charges	
Total Appliance Service Plan**	\$46.99
Total Other Charges	\$46.99

Amount Due: \$222.93
by September 01, 2022

if you pay after the due date, a 2% late payment charge will be added to your next bill.

B Account Balance

Total PIPP Amount Due Last Month	\$350.94
PIPP Frozen Back Balance	\$86.99
Payment on August 09, 2022	\$200.00
PIPP Back Balance Credit	\$3.86
PIPP Monthly Credit	\$40.62
Other non-Energy Charges	\$46.99
Total Energy Charges	\$65.62
Current Account Balance	\$306.06

Payments applied after Jul 1, 2022 are not included.

Your account balance includes a past-due Premium Services balance of \$150.94.

Current account balance would be due if not enrolled in PIPP program.


A PIPP Program and Other Charges Summary: Breaks out charges and provides total amount due for the month.

- Total PIPP Amount Due from Last Month:** Total due for the previous month's discounted bill.
- PIPP Monthly Plan Amount:** This is your monthly plan amount due for the billing period.
- Total Other Non-Energy Charges:** Programs or charges not covered by the PIPP program, such as the Appliance Service Plan.
- Amount Due:** This is your payment amount to be paid by the due date.

B Account Balance: This section includes payments received and other charges to reflect the current past due amount on your account.

- Total PIPP Amount Due from Last Month:** Amount due under the PIPP program.
- PIPP Frozen Back Balance:** The total amount owed at the time of enrollment gradually paid while enrolled in PIPP. This amount would be due if not enrolled into PIPP.
- Payment on Month, Day, Year:** Lists any payment(s) received since the last billing cycle.
- PIPP Back Balance Credit:** The amount of your PIPP Frozen Back Balance paid by the program (if applicable)
- PIPP Monthly Credit:** The amount of energy use paid by the program.
- Other Non-Energy Charges:** Programs or charges not covered by the PIPP program, such as the Appliance Service Plan.
- Total Energy Charges:** The amount of energy you used this billing cycle before the PIPP monthly credit.
- Current Account Balance:** Reflects the total amount owed on this account that would be due if not enrolled in the PIPP program.

Consumers Energy PIPP Program Report out to MPSC Staff

PIPP - 1st Missed Payment Notice

October 1, 2022

Customer
Address Line 1
Address Line 2

Dear [Customer First Name],

We noticed you have missed one or more full payments on the Percent of Income Payment Plan (PIPP). To stay in the program and continue receiving benefits, make a payment online today by visiting ConsumersEnergy.com/waystopay or call 800-477-5050.

We understand financial emergencies happen. If you are unable to make an immediate payment, please contact [Agency Name] at [Agency Phone Number], to learn about potential assistance options.

As part of the PIPP program, you are receiving:

- Reduced monthly payments
- Gradual forgiveness of your past due amounts over time
- Protection from shut-off


We want you to continue receiving these benefits, so please make your payment soon. If you are de-enrolled due to nonpayment, you will be responsible for the total amount due on your account including any past-due amounts that were deferred while you were enrolled in PIPP.

Sincerely,

Energy Assistance Team
ConsumersEnergy.com/assistance

Explore more assistance programs at ConsumersEnergy.com/assistance.

Consumers Energy PIPP Program Report out to MPSC Staff

PIPP - 2nd Missed Payment Notice


October 1, 2022

Customer
Address Line 1
Address Line 2

Dear [Customer First Name],

We wanted to let you know you have missed two or more full payments on the Percent of Income Payment Plan (PIPP). **If you are unable to make a payment of \$[XX.XX] by [XX/XX/20XX], you will be de-enrolled from the program and lose all plan benefits.** Make an online payment by visiting ConsumersEnergy.com or by phone at 800-477-5050.

As part of the PIPP program, you are receiving:

- Reduced monthly payments
- Gradual forgiveness of your past due amounts over time
- Protection from shut-off

If you are unable to make an immediate payment, please contact [Agency Name] at [Agency Phone Number], to learn about potential assistance options.

We want you to continue receiving these valuable benefits, so please take steps to arrange payment as soon as possible. If you are de-enrolled due to nonpayment, you will be responsible for the total amount due on your account, including any past-due amounts that were deferred while you were enrolled in PIPP.

Sincerely,

Energy Assistance Team
ConsumersEnergy.com/assistance

Explore more assistance programs at ConsumersEnergy.com/assistance.

Consumers Energy PIPP Program Report out to MPSC Staff

PIPP De-enrollment Letter



August 4, 2021
 CUSTOMER NAME
 STREET
 CITY, STATE ZIP

Dear NAME,

Unfortunately, a payment was not received by the required due date. As a result, your account has been de-enrolled from the Consumers Energy PIPP Program as of July 23, 2021

As a PIPP member, you received \$0.00 in benefits. You will no longer receive PIPP benefits in the future. Your remaining past due balance of \$674.92 has been re-applied to your account and will be your responsibility to pay.

Help paying your bill may still be available through agencies in your area. Dial 2-1-1, visit mi211.org to learn more today or visit www.ConsumersEnergy.com/assistance to learn more.

If you need additional help with your Consumers Energy bill, we recommend the following services:

- Apply for the Michigan Home Heating Credit to get money back from last winter's heating costs. The applications can be submitted January through September.
 - You do not have to file income taxes to qualify or apply for this credit. To find out more or to get help, dial 2-1-1 or visit MichiganFreeTaxHelp.org and click "Important Tax Credits."
- Change your bill due date to better fit your schedule. Visit www.ConsumersEnergy.com/smartenergy to choose your new bill due date.
- Schedule a free home energy analysis and learn about energy efficiency upgrades that will help reduce your energy bills by calling 877-448-9433 or visiting ConsumersHelpingNeighbors.com.

If you need help figuring out which assistance option is right for you, call Consumers Energy at 877-477-5050 to discuss your specific situation. We are here to help!

Sincerely,


Energy Assistance Team

Consumers Energy
 One Energy Plaza Jackson, MI 49201

Contact us at
ConsumersEnergy.com/assistance

Consumers Energy PIPP Program Report out to MPSC Staff

PIPP Pre-Graduation Letter



DATE

Customer
Address Line 1
Address Line 2

Dear [Customer First Name],

Congratulations! You are on track to successfully complete the Consumers Energy Percent of Income Payment Plan (PIPP) on [Date]. As part of the program, you have received the following benefits:

- A portion of your monthly energy bills were paid while enrolled in the program, totaling \$[xxx.xx] through your most current bill.
- Your past due balance at the time of enrollment was \$[xxx.xx] and will be paid in full upon successful program completion.

To help you budget for the future and save on your bill, we recommend the following services:

- Schedule a FREE in-home or virtual energy assessment and learn about various energy efficiency upgrades that will help reduce your energy costs by calling 877-448-9433 or visiting ConsumersEnergy.com/HelpingNeighbors.
- Apply for the Michigan Home Heating Credit to recover some of last winter's heating costs. Applications can be submitted January through September. To find out more or to get help, dial 2-1-1 or visit MichiganFreeTaxHelp.org.
- Enroll in Billing and Payment Alerts to receive notifications when your bill is ready or payment is due by visiting ConsumersEnergy.com/alerts or by calling 800-477-5050.

We appreciate your partnership in this program and look forward to serving you into the future.


Sincerely,

Energy Assistance Team
ConsumersEnergy.com/assistance

Explore more assistance programs at ConsumersEnergy.com/assistance.

Consumers Energy PIPP Program Report out to MPSC Staff

PIPP Graduation Letter



DATE

Customer
Address Line 1
Address Line 2

Dear [Customer First Name],

Congratulations! You have successfully completed the Consumers Energy Percent of Income Payment Plan (PIPP). As part of the program, you received the following benefits:

- A portion of your energy bills were paid while enrolled in the program, totaling \$[xxx.xx].
- Your past due balance at the time of enrollment was paid in the amount of \$[xxx.xx].

To support your continued success, we recommend the following services:

- Schedule a FREE home energy assessment and learn about various energy efficiency upgrades that will help reduce your energy costs by calling 877-448-9433 or visiting ConsumersEnergy.com/HelpingNeighbors.
- Apply for the Michigan Home Heating Credit to recover some of last winter's heating costs. The applications can be submitted January through September. To find out more or to get help, dial 2-1-1 or visit MichiganFreeTaxHelp.org.
- Our Budget Plan provides the option to spread out your energy costs into equal monthly payments. For more information or to sign up, please visit ConsumersEnergy.com/budgetplan.

Thank you for your partnership in the Consumers Energy PIPP program. We look forward to serving you on a future billing and payment program!

Sincerely,

Energy Assistance Team
ConsumersEnergy.com/assistance

Explore more assistance programs at ConsumersEnergy.com/assistance.

Consumers Energy PIPP Program Report out to MPSC Staff

Weatherization and Energy Savings Tips

Energy Savings Tips

ENERGY USAGE

- In winter set your thermostat to 68°F and 78°F in spring/summer to conserve energy. You can save as much as 10% cost by adjusting thermostat 7-10F up in spring/summer and in fall/winter for at least 8 hours a day.
- Clean or replace the furnace filter often during the heating season. Furnaces use less energy if they "breathe" more easily.
- For heating/cooling, set fans at slow speed to circulate the air throughout the house. This distributes hot and cold air, so the system doesn't use as much energy.

LIGHTING

- Turn lights off in rooms not in use or when sunlight is sufficient. Choose light bulbs carefully. LEDs use 80 percent less energy than standard incandescent bulbs and last 15 times longer.

WATER USAGE

- Install a low-flow aerator or flow restrictor on an existing shower head, and you'll use less water when it seems like more. Both are inexpensive and easy to install.
- Set your water heater temperature at 120°. Keep your hot water hot by making sure pipes in unheated areas are insulated.

COOLING

- Don't cool unused areas. Close doors/registers to cut energy costs. Operate your large appliances in the morning or evening when it's cooler outside. They add extra heat and make your air conditioner work harder.

WINDOWS

- Drapes can cut heat loss in half if they have an insulating liner. Use clear plastic or vinyl sheeting on the inside of your windows to make a temporary double-pane window. Use weatherproof tape or duct tape, trim or tacking strips to hold it in place.

WASHING MACHINE

- Wash your clothes in cold water to save on water heating costs. Use a cold-water detergent. You'll save by waiting to wash until you have a full load.

AIR REGISTERS/VENTS

- Make sure all air registers are clear of furniture so that air can circulate freely.

DRYER

- Dry your laundry in consecutive loads to take advantage of a heated dryer. Your laundry will dry faster and use less energy. Clean lint trap before every load.

WEATHERIZATION

- Sealing air leaks/adding insulation will improve comfort while conserving energy. Caulking/weather stripping any gaps will alleviate drafts.

REFRIGERATOR

- Set the refrigerator thermometer between 38° & 42° and your freezer between 0° & 5°. Let hot foods cool before putting them in your fridge/freezer. Hot foods cause the motor to work longer and harder.

ELECTRONIC DEVICES

- Electronic devices continue to draw power when not in use. This could add up to as much as 10% to your monthly bill. Unplug devices when not in use and use power strips that have an on/off switch to help save money.

STOVE/OVEN

- Thaw foods and cut vegetables into small pieces. Put lids on pots and pans, and make sure they're the right size for the burners. Foods will cook faster and use less energy.

RESOURCE LINKS & VIDEOS

- [Energy Star Products to Save Energy](#)
- [Rebate Finder](#)
- [100 Ways to Save on Your Energy Bill](#)
- [20 Ways to Save on Electricity at Home \[Video\]](#)
- [10 Ways to Make Your Home More Energy Efficient \[Video\]](#)
- [Thermostat Secrets And Other Tips To Reduce Your Utility Bills \[Video\]](#)
- [Energy Saving Tips \[Video\]](#)




Consumers Energy PIPP Program Report out to MPSC Staff

PIPP Frequently Asked Questions (FAQS) TrueNorth

Percent of Income Payment Plan (PIPP)





Your Monthly Bill Amount:

\$ _____



Helping Neighbors Appointment*:

[MONTH/DAY/YEAR]

[@ _____ : _____ am/pm]

*Schedule with your agency representative or on your own at ConsumersEnergy.com/HelpingNeighbors

PIPP FREQUENTLY ASKED QUESTIONS (FAQS)

When is my monthly payment due?
Your energy bill due date will not change unless you request it.

What if I have a past due balance?
Your past due balance will gradually be forgiven while enrolled in PIPP.

What if I miss a payment while enrolled in PIPP?
Failure to pay your bill on time and in full can result in early de-enrollment from the program. If removed, you would be responsible for your past due and current charges, including what was frozen upon enrollment. However, we are invested in your success, reach out to your enrolling agency if you need help.

Will my energy be shut off while enrolled in PIPP?
No, you are protected from energy services shut off while enrolled in the program.

How long will I be enrolled in PIPP?
PIPP is a 24-month program. Each household is eligible to receive up to \$6,000 of credits while enrolled in the program. High monthly energy use could result in early program completion for your household, even if a balance remains.

Do I have to use less energy?
This program is most successful when combined with our Helping Neighbors program to improve your home's efficiency. However, there is no requirement to make changes to your energy use.

What happens at my Helping Neighbors appointment?
An energy analyst will assess your home's energy efficiency for free and provide free upgrades, which could include insulating pipes, free LED bulbs, low-flow shower heads and faucet aerators (eligibility determined at the time of your Helping Neighbors appointment). You'll also receive tips on how to save more energy on your own.

What if I move during my enrollment in PIPP?
If you are moving or have moved during your enrollment in PIPP, please call us at 800-477-5050 to waive deposit or reconnection fees. You can stay in the program if new service is set up within 30 days.

Do PIPP payments cover optional programs like Appliance Service Plan (ASP)?
No, you are responsible for non-energy charges in addition to your PIPP monthly payment. **Note:** ASP charges are **NOT** included in your PIPP past-due bill forgiveness.


We are here to help if you have additional questions!
emPOWER 231-355-5880




Consumers Energy PIPP Program Report out to MPSC Staff


PIPP Frequently Asked Questions (FAQS) UWSCMI

Percent of Income Payment Plan (PIPP)





Your Monthly Bill Amount:
\$ _____



Helping Neighbors Appointment*:
[MONTH/DAY/YEAR]
[@ _____ : _____ am/pm]

*Schedule with your agency representative or on your own at ConsumersEnergy.com/HelpingNeighbors

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We are here to help if you have additional questions!
United Way of South Central Michigan 517-741-0202



Consumers Energy PIPP Program Report out to MPSC Staff

Helping Neighbors Program



Helping Neighbors Program

Helping Neighbors provides qualifying families with free upgrades and expert recommendations to help reduce energy use, improve comfort and support Michigan's clean energy future while saving money on your monthly energy bills.

How It Works

During an initial in-home assessment, a trained energy auditor will inspect free products like weatherstripping and sealability. Afterward, you'll receive a customized summary report with tips and recommendations to get you started on your energy saving journey — all at no cost to you.

See If You Qualify

Whether you're a homeowner, renter or resident of a manufactured home community, the Helping Neighbors program is available to any Consumers Energy customers who meet the income guidelines.

For households exceeding the income qualifications, we may still be able to help. For more information, visit ConsumersHomeEnergy.com.

Number of Family Members	Annual Household Income Limit (by State)
1	\$12,000
2	\$16,000
3	\$20,000
4	\$24,000
5	\$28,000
6	\$32,000
7	\$36,000
8	\$40,000
9+	\$44,000

Income guidelines are subject to change.

Visit ConsumersHomeEnergy.com to reserve your spot today, or natural gas customers call 877-446-9403 (option 3) and customers with electric/electric only service call 855-685-3312 for your free assessment.



Where Safety and Comfort Meet Efficiency

Your Free Upgrades

Helping Neighbors provides a wide range of products and services to help lower your energy costs. Your free, energy-saving upgrades may include:

- Indoor and outdoor LED bulbs*
- LED nightlights*
- Kitchen and bathroom faucet aerators
- High efficiency showerheads
- Water heater pipe wrap

*Your maximum savings from Consumers Energy.

How You Benefit

- Lower energy costs
- Improved comfort
- Expert recommendations
- No cost to participate
- Savings up to \$150 a year!



Pay nothing, save more.
Visit ConsumersHomeEnergy.com to reserve your spot today, or natural gas customers call 877-446-9403 (option 3) and customers with electric/electric only service call 855-685-3312 for your free assessment.

*Eligibility is very specific. We follow state health/safety guidelines during each appointment including the use of face masks, hand sanitizers, disinfectants, mask usage and social distancing.

Consumers Energy and its agents have been awarded financial incentives by the state of Michigan for the Helping Neighbors program. The state of Michigan has provided a grant to Consumers Energy to fund the Helping Neighbors program. The state of Michigan has provided a grant to Consumers Energy to fund the Helping Neighbors program. The state of Michigan has provided a grant to Consumers Energy to fund the Helping Neighbors program.



PIPP Helping Neighbors Training Program



Consumers Energy
Helping Neighbors Program

Empowering Households.
Building Communities.

Agency Training



What is the Helping Neighbors Program?

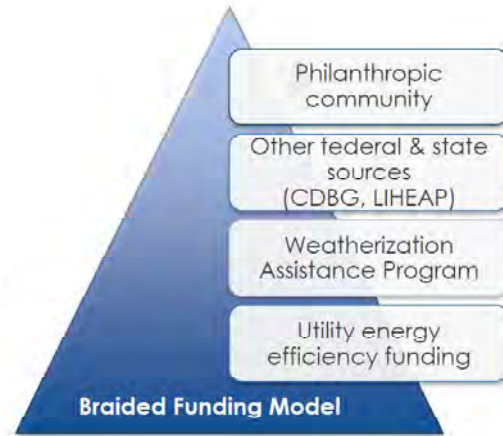


Helping Neighbors provides qualifying families with free upgrades and recommendations to help reduce energy use, improve comfort and support Michigan's clean energy future.

Consumers Energy PIPP Program Report out to MPSC Staff

Key Program Designs

- Provide a positive customer experience
- Focus on underserved communities and maximize participation rates
- Leverage existing community and human services networks
- Engaging community organizations
- Establish enduring community relationships
- Prioritize improvements for greater energy savings per home
- Continue to be embedded in the communities we serve



3

How the Helping Neighbors Program Works



During an initial in-home assessment, a trained analyst will install a carbon monoxide alarm and other qualifying free products that prioritize safety, savings and sustainability.



4

Consumers Energy PIPP Program Report out to MPSC Staff

How the Helping Neighbors Program Works



Home
Assessment

During an initial in-home assessment, a trained analyst will install a carbon monoxide alarm and other qualifying free products that prioritize safety, savings and sustainability.



Premium Measures
Improvements

Premium measures provide deeper and broader savings impact, including:

- Major appliance replacements and system tune-ups on air conditioner, furnace, boiler, water heater, refrigerator.
- Home envelope upgrades including insulation, air/duct sealing.

5

Services for Organizations



- Agencies & property owners:
 - Rebate incentives for upgrades installed by community organizations for retrofit/weatherization projects.
 - Referrals for Customer and or properties.
 - Community event collaboration opportunities.

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Consumers Energy PIPP Program Report out to MPSC Staff

Who Qualifies for the Helping Neighbors Program?

Property Type	Single-family (1-4 units)	✓
	Manufactured housing	✓
	Multi-family (5+ units)	
Service Type	Electric-only*	✓
	Combination	✓
	Natural gas-only	✓
Who Should Enroll?	Homeowners	✓
	Renters (responsible for utility payment)	✓
	Landlords and building owners	✓
	Affordable housing organization	✓
	Energy assessment of home	✓
Services Provided	Direct install	✓
	Premium services (air sealing, equipment upgrades, tune-ups)	✓
	Rebates (rehab, weatherization)	✓
	Rebates (new construction)	

Eligibility Guidelines:

- Serving income-eligible households at or below 200% of the federal poverty level (FPL).
- Property Type must be single-family (see chart - left).
- Utility Service Type must be Consumers Energy (see chart - left).
- We have options for homeowners, renters, and resident of manufactured homes.

*A customer may be eligible to receive additional measures, and services if funding is available, program services are expanded and/or the related services are geographically available.

Source: <https://aspe.hhs.gov/poverty-guidelines>

Customer Benefits

- No cost to participate
- Improved comfort
- Reduces energy use
- Expert recommendations & online scheduling
- Options are available for renters or homeowners
- Access to energy education materials and resources
- Collaboration with utility bill payment assistance resources
- Support Michigan's clean energy future



Consumers Energy PIPP Program Report out to MPSC Staff

Community Outreach Engagement

- Engage community leaders early
- Be active on the neighborhood level
- Establish connections with local agencies to establish referral or collaboration opportunities
- Use earned media and public relations to build brand recognition (reviews, media coverage, customer posts, etc)

Marketing Engagement

- Target customers by zip codes
 - Email
 - Direct mail
 - Digital media campaigns
 - Flyers
 - Hotline/outbound calling
 - Presentations
- Identify customer base - prioritize by zip codes, also take a targeted focus on those identified in CARE, LIHEAP and MEAP groups.

Consumers Energy PIPP Program Report out to MPSC Staff

Home Assessments - How to use online scheduling?

Step 1:

Navigate to the Helping Neighbors Program Web page (<https://www.consumersenergy.com/residential/save-money-and-energy/assessments/helping-neighbors>).

Online scheduling only takes about five minutes.

Helping Neighbors Program: Energy Efficiency Assistance

COVID-19 Alert: Appointments Now Available

Consumers Energy remains committed to the health and well-being of our customers, employees and communities here in Michigan. While we temporarily suspended some of our income and home energy efficiency programs in March, we are now in the process of reopening them to let our customers help us save energy and money. You can be assured that safety will continue to be our priority. Our teams will be following enhanced safety protocols, including maintaining social distancing where possible and wearing face masks when within six feet of others. Some programs will offer virtual or no-contact options. In our in-person support, we look forward to working with you.



Step 2:

Select your fuel type (Electric Only & Natural Gas Customers)

Enjoy the Money-Saving Benefits of the Helping Neighbors program for Free

If you have a qualifying household income, our Helping Neighbors program can help your family save energy and money while improving the comfort of your home.

Through the program, an expert energy analyst will assess your home's energy efficiency for free. They'll then offer to perform free energy upgrades. These may include insulating pipes — installing free LED bulbs, showerheads and kitchen and bathroom faucet aerators (eligibility determined at the time of your Helping Neighbors appointment). You'll also receive tips on how you can save more energy on your own.

Natural Gas or Combination Customers



Start Here If You're A Natural Gas Or Combo Customer

Electric Customers



Start Here If You're An Electric Customer

How to use online scheduling?

Consumers Energy PIPP Program Report out to MPSC Staff

How to use online scheduling?

Step 3:

Confirm your fuel type by answering the question.

Is Your Home Eligible?

The home energy assessment appointment is available to our natural gas or combination (natural gas and electric) customers.

You can participate if you live in a single family home, mobile home, apartment or condo with four or fewer connected units. If you own your apartment or condo, you qualify regardless of the number of connected units. Past participation in the Helping Neighbors or Home Energy Analysis program may preclude account number from participation in the program.

Let's Start Saving Now!

Get started below to schedule your appointment!

Do you receive natural gas from Consumers Energy?

- Yes
- No

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How to use online scheduling?

Step 4:

Confirm how many people are in your household by responding to the on screen the question.

Part A - Navigate to Dropdown



How many people are in your household?
Select

Part B - Use Dropdown to select many people are in your household



Select
Prefer not to disclose
1
2
3
4
5
6
7
8
9
10
11
12
13

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Consumers Energy PIPP Program Report out to MPSC Staff

How to use online scheduling?

Step 5:

Confirm household income for last year by responding to the on screen the question.

For last year, was the total annual income for your household \$51,500.00 or less?

- Yes
- No
- Prefer not to disclose

A family of four is used for the above example.

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How to use online scheduling?

Step 6:

Select the "Schedule Now" prompt to advance to Consumers Energy Online Scheduling.

Thank you! We've found the home energy audit program for you.

Click below to schedule your appointment!

Schedule Now

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Consumers Energy PIPP Program Report out to MPSC Staff

How to use online scheduling?

Step 7:

To schedule an appointment, select the “I’d like to schedule a no-cost Helping Neighbors appointment” then click on the “Let’s go button”.

Consumers Energy Online Scheduling
Consumers Energy customers can use this tool to easily schedule their own no-cost home energy assessment.

To be eligible for the Helping Neighbors program, customers must:

- Receive natural gas or combination (natural gas + electric) service from Consumers Energy
- Reside in a single family home, condo, manufactured home, or 2-4 unit apartment building
- Meet income eligibility requirements (For customers who exceed income eligibility requirements, our Home Energy Analysis program may still be able to help. Visit HomeAnalysis-ConsumersEnergy.com/schedule)

If you need help with scheduling or have questions on eligibility requirements, please call us at 877-448-9433 for assistance.

I'd like to schedule a no-cost Helping Neighbors appointment
 I'd like to reschedule or cancel my appointment

LET'S GO

Call our Customer Service center 877-448-9433 for assistance.

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How to use online scheduling?

Step 8:

Select the button for appointment type, In-home or Virtual. An In-home appointment is recommended as this allows for more effective home analysis.

In-Home Energy Assessment

One of our **trained analysts visits your home while you are there** to identify the best opportunities for you to save.

Possible upgrades **the analyst installs** during the appointment may include:

- Water pipe insulation
- LED bulbs
- New showerheads
- Kitchen and bathroom faucet aerators
- A programmable thermostat

Schedule In-Home

Virtual Energy Assessment

Using your **smart device** and simple web-based technology, **a trained analyst will guide you through your home** to identify key energy-saving opportunities and make personalized efficiency recommendations, just as they would during a typical in-person appointment.

When your appointment is complete, we'll send a free **energy-saving kit to your home for you to install**, which may include:

- Water pipe insulation
- LED bulbs
- New showerheads
- Kitchen and bathroom faucet aerators
- A programmable thermostat

Schedule Virtual

OR

Call our Customer Service center 877-448-9433 for assistance.

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Consumers Energy PIPP Program Report out to MPSC Staff

How to use online scheduling?

Step 9:

Confirm eligibility by selecting household size and last years annual income. When complete select continue.

Great! Let's make sure you are eligible.

Please answer the following program qualifying question.

Number of people in your household *

For last year, was the total annual income for your household \$25,760.00 or less? *

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How to use online scheduling?

Step 10 (Part A):

Reply to an screen questions:

- 1.) Enter Customer contact information.
 - 2.) Select "What type of home do you have" (Single-family, condo, manufactured home, apartment)?
 - 3.) Select "What type of fuel do you use to heat home" (Natural Gas, Propane, Fuel Oil, Electricity, Unsure, & Other)?
 - 4.) Select "What type of fuel does your water heater use" (Natural Gas, Propane, Electricity, & Unsure, Other)?
- When complete continue to Part B.

1.)	First Name * <input type="text" value="Write Here"/>	Last Name * <input type="text" value="Write Here"/>	Email * <input type="text" value="Write Here"/>	Best Phone * <input type="text" value="Write Here"/>	Is this a Mobile Phone <input type="checkbox"/>	Alternate Phone <input type="text" value="Write Here"/>	Service Zip * <input type="text" value="Write Here"/>
2.)	What type of home do you have? * <input type="text" value="--Select--"/>						
3.)	What type of fuel do you use to heat home? * <input type="text" value="--Select--"/>			4.)	What type of fuel does your water heater use? * <input type="text" value="--Select--"/>		

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Consumers Energy PIPP Program Report out to MPSC Staff

How to use online scheduling?

Step 10 (Part B):

Reply to on screen questions.

- 1.) Select "Does your home have a basement" (Yes, No)?
 - 2.) Select "Do you own or rent" (Own, Rent)? **Renters Must provide property Owner Contact Information.**
 - 3.) Select "How did you hear about this program" (choose an option)?
 - 4.) Select "Did you receive a promotional code" (select a promo code if you do not have one select "None")?
- When complete continue to Part C.

1.) Does your home have a basement?	--Select--	▼
2.) Do you own or rent?*	--Select--	▼
3.) How did you hear about this program? *	--Select--	▼
4.) Did you receive a promotional code?	--Select--	▼

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How to use online scheduling?

Step 10 (Part C):

Review and accept the Program Terms and Conditions.

When complete select continue.

ELIGIBILITY

This Program is valid for residential customers only. In order to be eligible, customers must utilize natural gas or combined natural gas and electric distribution service from Consumers Energy. Any/all direct install measures offered by this program may be installed if the Energy Technician determines that energy savings will result. Measure eligibility depends on utility services provided by Consumers Energy.

INFORMATION RELEASE

Customer agrees that the utility provider(s) may include customer's name, address, utility provider(s) account number, utility provider(s) services

I understand and accept the terms and conditions.

BACK

CONTINUE

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Consumers Energy PIPP Program Report out to MPSC Staff

How to use online scheduling?

Step 11 :

- 1.) Select Copy information from the previous page.
- 2.) Enter Utility Account Number Available.
- 3.) Enter Home Address information. When complete select continue.

1.) Copy information from the previous page

Utility

Account # (Please enter if available) Account Holder First Name* Account Holder Last Name*

Write Here Write Here Write Here

2.)

Details about your home

3.)

Service Street # * Service Street Name * Service Apt #/ Lot#/ Unit #

Write Here Write Here Write Here

City* State* Zip*

Write Here MI 48912

How to use online scheduling?

Step 12 :

- Select an appointment time window.
- When complete select continue.

June 2022

Sun	Mon	Tue	Wed	Thu	Fri	Sat
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

1:00 PM - 4:00 PM

2:00 PM - 5:00 PM

3:00 PM - 6:00 PM

4:00 PM - 7:00 PM

1:00 AM - 11:00 AM

2:00 AM - 11:00 AM

3:00 AM - 11:00 AM

4:00 AM - 11:00 AM

1:00 PM - 4:00 PM

2:00 PM - 5:00 PM

3:00 PM - 6:00 PM

4:00 PM - 7:00 PM

1:00 AM - 11:00 AM

2:00 AM - 11:00 AM

3:00 AM - 11:00 AM

4:00 AM - 11:00 AM

Please call me if an earlier appointment becomes available.

Consumers Energy PIPP Program Report out to MPSC Staff

How to use online scheduling?

Step 13:

You are all set!
Review appointment confirmation.

You are all set!

Confirmation Number: 0420816
Your appointment is booked for 09:00 AM - 11:00 AM on 7/8/2022.
Please check your email for a confirmation.

THANK YOU

Call our Customer Service center 877-448-9433 for assistance.

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For Immediate Need Referrals - How to use online scheduling?

Step 1:

Navigate to online Customer Referral Form Web page & review eligibility criteria.
(https://myrebate.formstack.com/forms/agency_referral_form).

Helping Neighbors - Customer Referral Form

The Helping Neighbors Program helps single-family homes (up to 4-unit or less within one building), that meet income criteria; combined household income must be at or below 200% of the Federal Poverty Level (FPL). This program helps customers reduce energy usage and improve comfort in their homes. It offers no-cost, direct services that include energy efficiency upgrades, home energy assessments and energy savings education.

The Helping Neighbors Program is designed to be a prevention service - If a customer is facing an immediate need to a heating or repair crisis, please advise them to first seek emergency assistance from organizations listed below:

- Michigan Department of Health and Human Services - Offers assistance to correct unsafe conditions and restore essential services. Go to MDHHS - Energy & Weatherization (michigan.gov) for additional information about the State Emergency Relief Program.
- Michigan 2-1-1 - Is a free and confidential service that connects customers with local community-based organizations across the state that offer thousands of programs and services for people seeking assistance. Dial 211 on your phone, and a certified Contact Specialist will serve you in a confidential and compassionate manner. Specialists are available 24/7.

Next

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Consumers Energy PIPP Program Report out to MPSC Staff

For Immediate Need Referrals - How to use online scheduling?

Step 2:
Provide Agency and contact information.

The screenshot shows a web form titled "Referring Organization". It contains the following fields: "Organization*" (a dropdown menu with the text "--Please select one of the following--"), "Contact*" (a text input field), "Phone*" (a text input field), "Email*" (a text input field), and "Promo Code" (a text input field). At the bottom of the form, there are two blue buttons labeled "Previous" and "Next".

For Immediate Need Referrals - How to use online scheduling?

Step 3:
Provide Agency and contact information.

The screenshot shows a web form titled "Referring Organization". It contains the following fields: "Organization*" (a dropdown menu with the text "--Please select one of the following--"), "Contact*" (a text input field), "Ethnicity*" (a text input field), "Email*" (a text input field), and "Promo Code" (a text input field). At the bottom of the form, there are two blue buttons labeled "Previous" and "Next".

Consumers Energy PIPP Program Report out to MPSC Staff

For Immediate Need Referrals -
How to use online scheduling?

Step 4:
Provide Customer contact
information.

Customer Information

Account Holder Name*

Consumers Energy Service Address*

Address Line 1:

Address Line 2:

City: ZIP Code:

Customer Phone*

Consumers Energy Service Type(s)

Gas Electric

Previous Next

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For Immediate Need Referrals
- How to use online scheduling?

Step 5:
Provide Customer Home
information.

Customer Home Info

Home Ownership*

Owner Occupied
 Rental
 Vacant

Residential Home Type*

Single-Family Mobile Home Manufactured Home Townhome Condominium

Year the home was built:

Home Square Footage:

Structure Type

Basement Crawlspace Slab on Grade

Previous Next

Renters Must provided property Owner Contact Information.

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Consumers Energy PIPP Program Report out to MPSC Staff

For Immediate Need Referrals - How to use online scheduling?

Step 6:
Confirm Customer Household Income information.

Helping Neighbors - Income Verification

Does the customer's income fall at or below 200% of the 2022 Federal Poverty Guidelines (per the table below):*

Yes

No

Household size	200% Federal Poverty Level
1	\$27,180
2	\$36,620
3	\$46,060
4	\$55,500
5	\$64,940
6	\$74,380
7	\$83,820
8	\$93,260
9	\$102,700
10	\$112,140
11	\$121,580
12	\$131,020

Source: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

Previous Next

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For Immediate Need Referrals - How to use online scheduling?

Step 7:
Confirm the specific Customer need. Select the applicable options and In your own words what exactly does the customer need?

Referral:

Is this referral for a Consumers Energy customer facing a "No Heat" crisis caused by an EXISTING Natural Gas appliance that is improperly functioning (Forced Air Furnace below 96% AFUE or Hot Water Boiler below 95% AFUE)?*

Yes No

*AFUE: Annualized Fuel Utilization Efficiency

Is this referral for a Consumers Energy customer facing a "No Hot Water" emergency caused by an EXISTING Natural Gas Water Heater that is improperly functioning (appliance efficiency must be below .64 Uniform Energy Factor)?*

Yes No

**UEF: Uniform Energy Factor

Is this referral for a Consumers Energy electric service customer who is without cooling as a result of an EXISTING Central AC unit that is improperly functioning (appliance efficiency must be below 16 SEER)?*

Yes No

*SEER: Seasonal Energy Efficiency Ratio

In your own words what exactly does the customer need? *

Previous Submit Form

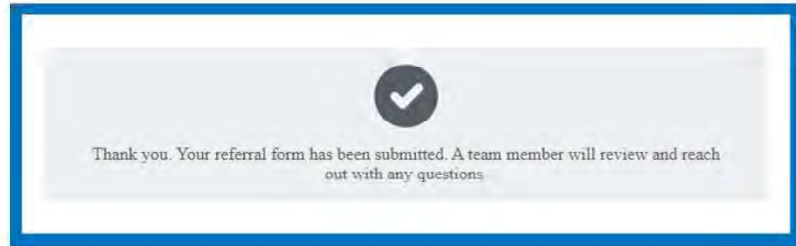
32

Consumers Energy PIPP Program Report out to MPSC Staff

For Immediate Need Referrals - How to use online scheduling?

Step 8:

You are all set!
Your Customer Referral has been Submitted.



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Thank You!



Individual Customer Participation
Energy Assessments For Your Home
Visit ConsumersHelpingNeighbors.com
Or call 877.448.9433 (Option 1)



Agency Collaboration Opportunities
ConsumersRehabReservations@clearesult.com



Consumers Energy PIPP Program Report out to MPSC Staff

Helping Neighbors (Home Energy Audit) Brochure

See if You Qualify

Whether you're a homeowner, renter or resident of a manufactured home community, the Helping Neighbors program is available to any Consumers Energy electric customers who meet the income guidelines.

For households exceeding the income qualifications, we may still be able to help. For more information, visit HomeEnergyAnalysis.com.

Helping Neighbors
Income Eligibility Guidelines

Persons In Family/Household	Annual Household Income at or Below*
1	\$30,120
2	\$40,880
3	\$51,640
4	\$62,400
5	\$73,160
6	\$83,920
7	\$94,680
8	\$105,440
9+	\$110,760

*Rounded through 000s. Visit cehelpingneighbors.com for more information on income qualifications for household members for the 2020 poverty guidelines.



Helping Neighbors Program

Supporting qualifying families with free upgrades and expertise to save money and energy.



Visit CEHelpingNeighbors.com or call **833-685-1312** to schedule your free assessment today.

Customers are required to meet program income criteria: unearned household income must be at or below 200% of the federal poverty level (FPL). Program funds are limited to and are available in select geographic areas on a first-come, first-served basis. Eligibility for each measure is determined at the time of the appointment. To be eligible, the location where the audit is performed must receive electric service from Consumers Energy, and the account number must be active. Medals are available for separately metered dwellings that contain up to four households. For multi-family properties with five units or more, please call 877-813-9617.

Past participation in the Helping Neighbors or Home Energy Analysis programs may preclude an account number from participation in the program. A customer may be eligible to receive additional efficiency measures and services from the Helping Neighbors program if funding is available, program services are expanded and/or the related program services are geographically available. An adult, 18 years or older must be present at the time the Helping Neighbors assessment is conducted.

Consumers Energy PIPP Program Report out to MPSC Staff

Where Safety and Comfort Meet Savings

How It Works

During an in-person or virtual assessment, a trained energy expert will install or send free products for safety, savings and sustainability.

You'll also receive a customized Home Energy Report with tips and recommendations to get you started on your energy-saving journey — all at no cost to you.

You may also be eligible for additional free premium upgrades, such as a refrigerator, AC unit and/or a dehumidifier. Eligibility is determined at the time of the appointment.

Your Free Upgrades

Helping Neighbors provides a wide range of products and services to help lower your energy costs. Your FREE energy saving upgrades may include:





How You Benefit

- Savings up to \$150 per year
- Improve home comfort
- Get expert recommendations
- Support Michigan's clean energy future


Pay Nothing, Save More

Visit CEHelpingNeighbors.com or call **833-685-1312** to schedule your free assessment today.



Consumers Energy PIPP Program Report out to MPSC Staff

PIPP EWR Outreach (Home Energy Audit)



Consumers Energy
Count on Us!

We'll Pay You \$15 to Save Energy

Treat yourself to free savings and \$15 too.

Schedule a no cost Home Energy Analysis today and save up to \$150 a year with a free kit of energy saving goodies installed by experts you can count on. With quick online scheduling, in-home and virtual (where kit will be mailed with instructions) options, and free efficiency upgrades in your customized kit, like advanced power strips and more, we'll make saving energy each month easy and affordable.

This offer is limited, reserve your free custom home energy kit and \$15 rebate today!

[Reserve Yours Today](#)

Offer code: 15TREAT

Extra goodies to save you energy

During your appointment, your energy analyst will walk you through your home to discover new ways to save energy and add comfort all year. Your free kit of energy upgrades is customized for your home and you will get a \$15 rebate for taking the first step toward a more efficient home.

Your free energy kit may include:*

- LED bulbs and nightlights
- Programmable thermostat (eligibility determined at time of visit)
- Advanced power strip
- High efficiency showerheads
- Faucet aerators
- Water heater pipe wrap

[Schedule Now](#)

Offer code: 15TREAT

Your safety is our priority. For in-home assessments, we follow established health guidelines, including the use of face masks, hand sanitizers, disinfecting work areas and social distancing.

This is one of several programs designed to help you. Your small changes can have a big impact on Michigan—and this program is just one example.

BECOME A FORCE OF CHANGE

[Learn More](#)

*Program funds are limited to and are available in select geographic areas on a first come, first served basis. Eligibility for each measure is determined at the time of the appointment. To be eligible, the location where the audit is performed must receive natural gas and/or combination (natural gas and electric) service from Consumers Energy and the account number must be active. Past participation in the Home Energy Analysis or Helping Neighbors programs precludes account number from participation in the program. For in-home assessments, an adult 18 years or older must be present at the time of the appointment.

We're Here for You!

Choose the most convenient method to contact us.

[Online](#) [Email](#) [177-489-03](tel:17748903)
(select option 1)

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One Energy Place, Jackson, MI 48601

[Consumers](#) | [Assurances](#)

PIPP Flat Rate Agency Training Guide

PIPP Flat Rate Training Guide

August 2022



Agenda

- PIPP Program Overview
- Consumption Table Review
- Dunning Process
- Communications
- Agency Touchpoint Calls
- CEPASS
- Questions and Discussion

Consumers Energy PIPP Program Report out to MPSC Staff

Pilot Overview

- This Percentage of Income Payment Plan (PIPP) pilot designed to test how customers perform versus CARE
- Much of the program is the exact same as CARE
- Major difference is how the discounted customer bill is calculated, and the program's credit and arrears caps
- SER is not required for PIPP

3

PIPP Program- 24 months

Commodity	% of Income	Min. Mo. Payment
Single (G or E)	3%	\$10
Combo (G&E)	6%	\$10

Eligibility

Federal Poverty Level \leq 150%	\$6k Arrears Cap
\$6k Credit Cap over 2 years	

Arrears Forgiveness

1/24th of starting arrears forgiven monthly

Dunning

Default occurs when past due is equal to 2 monthly payments

EWR

Encourage and promote EWR participation
Home Energy Audit scheduling and premium measures tracking

4

Consumers Energy PIPP Program Report out to MPSC Staff

Customer Payment Calculation

Formula: (Annual Gross Income)*(3% or 6%) / 12

PIPP Program- 24 months		
Commodity	% of Income	Min. Mo. Payment
Single (G or E)	3%	\$10
Combo (G&E)	6%	\$10

The lowest possible payment is \$10 a month

This will be calculated by CEPASS during enrollment

- Calculation is only completed upon enrollment

Note: customers will still be responsible for their non-energy charges, including the Appliance Service Plan

5

CEPASS Enrollment Process



Drop down to select from PIPP or CARE

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Consumers Energy PIPP Program Report out to MPSC Staff

PIPP/CARE Program

Make a selection below to request a change in account status.

PIPP program

Number In Household

Household Income

Enter :

- Number of household
- Household income
- Authorization ID(s)

Hit Submit:

Summary Details Billing History Help/Comments Account Reports Annual Fuel Cost Payment Program

Unsuccessfully completed (See details)

7

Customer's monthly payment will appear in History

History

Date	Status	Reason	Additional Information	Federal Poverty Level	Program Option	Organization	Person	Start Date	End Date	Monthly Plan amount
9/13/2022	ENROLLED	Agency Request			PIPP	Partnership Center	PORTAL	9/13/2022	9/12/2024	80.00

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Consumers Energy PIPP Program Report out to MPSC Staff

If you try to enroll an account that has Theft/Fraud marked yes:

The image shows two screenshots of a web portal interface. Both screenshots display account information for accounts with 'Theft' and 'Fraud' marked as 'Yes'. The top screenshot shows account details for account number 1000404103, with fields for First Name, Last Name, Service/Billing Address, Account Type, and Move-In/Out Service Dates. The bottom screenshot shows account details for account number 100140104, with similar fields. Both screenshots include a navigation bar with tabs for Summary, Details, Billing History, Notes/Comments, Account Reports, Annual Fuel Cost, and Payment Programs. A red error message is visible at the bottom of each screenshot: 'This Customer has Theft or Fraud @ Yes'.

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Dunning Process – Same as CARE

- 1st Warning notice at 1x monthly payment amount past due
- 2nd Warning notice at 2x monthly payment amount past due
- De-Enrollment letter after failure to pay by 2nd warning due date
- All past due is owed upon program default

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Consumers Energy PIPP Program Report out to MPSC Staff

CE Communications

- Welcome Letter
 - Sample Bill
- Default Letters (if applicable)
- De-enrollment Letter (if applicable)
- Pre-graduation Letter
- Graduation Letter

Percent of Income Payment Plan (PIPP)

Your Monthly Bill Amount: \$

Helping Reaffirm Assurances¹
 (MONTH/DAY/YEAR)
 (Signature)

PIPP FREQUENTLY ASKED QUESTIONS (FAQ)

When is my monthly payment due?
 Your PIPP bill will be due on the 15th of each month unless you have selected a different date.

What if I have a partial bill?
 PIPPs are billed monthly, but you may receive a partial bill if you are enrolled in the program during a month with fewer than 31 days.

What if I miss a payment or do not enroll in PIPP?
 If you miss a payment or do not enroll in PIPP, you will be billed for the amount of the missed payment plus a late fee. If you do not enroll in PIPP, you will be billed for the amount of the missed payment plus a late fee.

What if I have a question about my PIPP?
 If you have a question about your PIPP, please call 1-800-455-4545 or visit our website at www.consumersenergy.com/pepp.

Do I have to use gas service?
 Yes, you must have gas service to be eligible for the PIPP program.

What if I have a question about my PIPP?
 If you have a question about your PIPP, please call 1-800-455-4545 or visit our website at www.consumersenergy.com/pepp.

Do PIP payments cover optional program fee?
 Yes, PIP payments cover the optional program fee.

Odds and Ends

Contact Information

Assistance and CEPASS questions:
EnergyAssistance@cmsenergy.com

PIPP questions:
POBoxCARE@cmsenergy.com


Exceptions can be made upon request to POBoxCARE

Consumers Energy PIPP Program Report out to MPSC Staff

PIPP Agency One Pager Training FAQ for Agents

PIPP Program

FOR AGENCY INTERNAL USE ONLY



PROGRAM BENEFITS:

24 month program

- Regardless of enrollment date, clients will be enrolled for a full 2 years.
- Clients will automatically be enrolled into their second year after 12 months.

Monthly Benefit

- Clients will pay a flat amount each month based on the number of people in their household and household income
 - If a client moves while enrolled in PIPP, their monthly payment will remain the same at the new address.
 - The exception is if a customer is moving from a combo to a single commodity or vice versa.

Account Balance Forgiveness:

- Upon enrollment, past arrears are frozen and gradually forgiven
- Arrears are split evenly over 24 months
- Installments are credited on the 15th of each month

Holds:

- Clients receive a 30-day Eligibility Determination hold upon applying for SER
 - This is automatic if applied in MIBridges but a caseworker has to manually place the hold in CE PASS.
- If approved, they receive another 30 day hold for the SER payment to be applied to their account and get co-pay assistance if necessary
 - The caseworker has to put the commitment in CE PASS and then they receive the hold

No late payment charges and customer is **protected from shutoff** while enrolled in PIPP

ELIGIBILITY CRITERIA:

- Gross Income falls at or below 150% Federal Poverty Level (FPL) guidelines
 - Exceptions can be requested by the enrollment agency
- Account balance less than \$6,000
- No unaddressed theft or fraud
- Residential electric, natural gas, or combination customer
- SER is not required for PIPP

DEFAULT PROCESS:

Clients will receive two communications prior to de-enrollment:

- 1st Warning notice at 1x monthly payment past due
- 2nd Warning notice at 2x monthly payment past due
- De-Enrollment letter after failure to pay by the due date in the 2nd Warning
- All past due amounts are owed upon program de-enrollment

COMMUNICATIONS:

Clients will receive multiple communications from Consumers Energy:

- Welcome Letter with sample bill
- Default Letters (if applicable)

Consumers Energy PIPP Program Report out to MPSC Staff

- De-enrollment Letter (if applicable)
- Graduation Letter

CUSTOMER PAYMENT:

Customers monthly payment will be 3% (single commodity) or 6% (dual commodity) of annual household income. Minimum \$10. Customers will still be responsible for their non-energy charges, including the Appliance Service Plan

PIPP Program- 24 months		
Commodity	% of Income	Min. Mo. Payment
Single (G or E)	3%	\$10
Combo (G&E)	6%	\$10
Eligibility		
Federal Poverty Level ≤ 150%		\$6k Arrears Cap
\$6k Credit Cap over 2 years		
Arrears Forgiveness		
1/24 th of starting arrears forgiven monthly		
Dunning		
Default occurs when past due is equal to 2 monthly payments		
EWR		
Encourage and promote EWR participation		

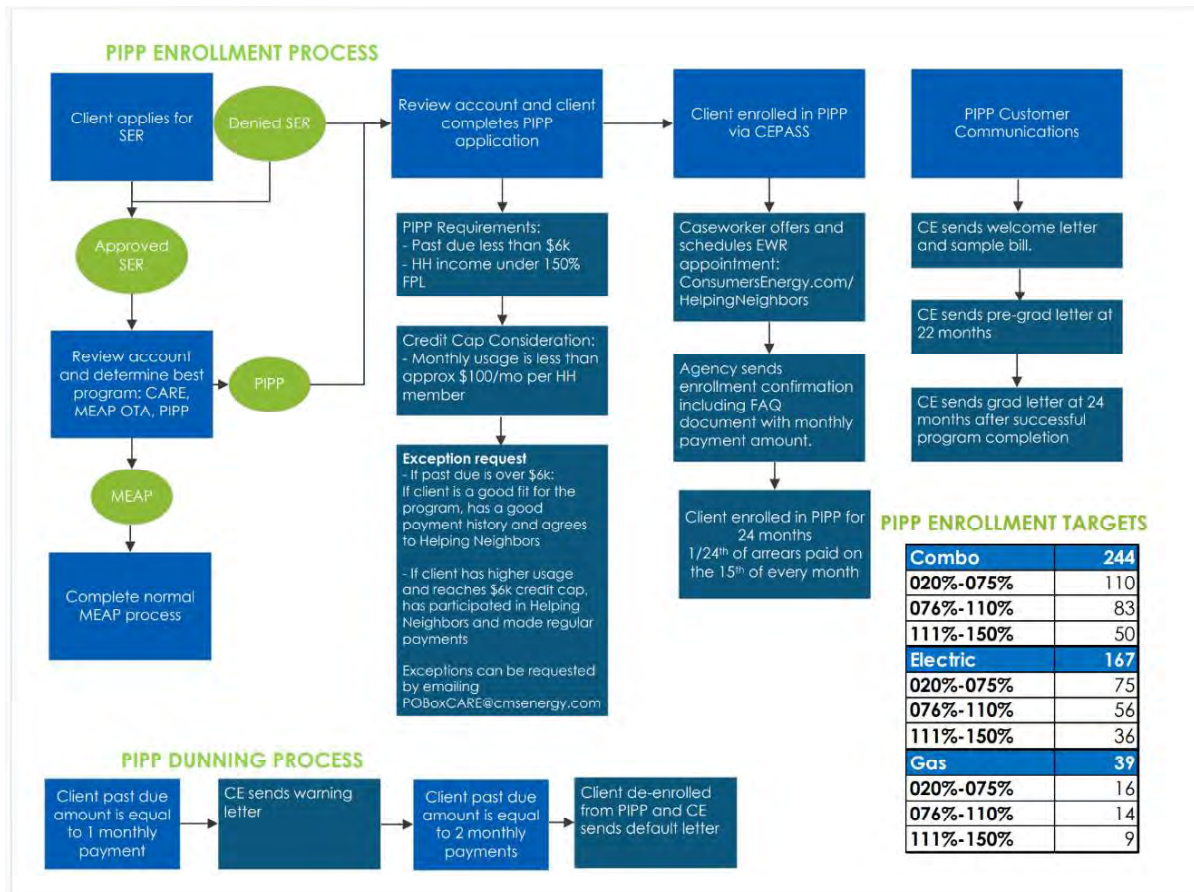
2022 FEDERAL POVERTY GUIDELINES

We will use 2023 guidelines when those are released.

2022 Federal Poverty Level Guidelines		
Number of Household Members	150% FPL Annual	150% FPL Monthly
1	\$20,385	\$1,699
2	\$27,465	\$2,289
3	\$34,545	\$2,879
4	\$41,625	\$3,469
5	\$48,705	\$4,059
6	\$55,785	\$4,649
Each additional household member add:	\$7,080	\$590

Consumers Energy PIPP Program Report out to MPSC Staff

PIPP Agency Training Process Map for Enrollment and Dunning



Consumers Energy PIPP Program Report out to MPSC Staff

PIPP Agency Needs Assessment Decision Matrix

Decision Matrix								
Approved SER		CARE/CARE Pilot Forecast (\$2,000 MEAP Cap)						
Denied SER due to income/child support non-compliance		\$0.00						
Approved SER or Denied SER for acceptable reason, under 150% FPL								
Approved SER <20% FPL/Client Choice - OTA		PIPP Forecast - Single Commodity (\$3,000 CL Cap)		PIPP Forecast - Dual Commodity (\$3,000 CL Cap)				
		\$0.00		\$0.00				
Consumers APP		FPL	Monthly Income	Single Commodity Pmt.	Dual Commodity Pmt.	Natural Gas	Electric	Monthly Payment
PIPP <150% FPL				\$0.00	\$0.00			
CARE <150% FPL/Pilot <20% FPL						\$0.00	\$0.00	\$0.00
Wicklund's Forecast Tracker				CARE/CARE Pilot Customer Flat Rate:		FPL	Rate	
Average Usage, 12 Months - Gas				Natural Gas - <\$1000/yr	20-75%	\$	30.00	
Average Usage, Monthly - Gas	\$				76-110%	\$	35.00	
Customer Flat Rate - Gas					111-150%	\$	40.00	
Average Usage, 12 Months - Electric				Natural Gas - >\$1000/yr	20-75%	\$	40.00	
Average Usage, Monthly - Electric	\$				76-110%	\$	45.00	
Customer Flat Rate - Electric					111-150%	\$	50.00	
Average UWIC Payment, Monthly	\$			Electric - <\$2000/yr	20-75%	\$	60.00	
Account Arrears					76-110%	\$	70.00	
Account Arrears, Monthly	\$				111-150%	\$	80.00	
Months Left in Season				Electric - >\$2000/yr	20-75%	\$	90.00	
					76-110%	\$	100.00	
					111-150%	\$	110.00	
Table for PIPP Arrears Calculations - Single Commodity				Table for PIPP Arrears Calculations - Dual Commodity				
Account Arrears				Account Arrears				
Account Arrears, Monthly		\$0.00		Account Arrears, Monthly		\$0.00		
Months Left in Season				Months Left in Season				

Consumers Energy PIPP Program Report out to MPSC Staff

UWSCMI MEAP (Needs Assessment) Application

MEAP Energy Security Application



Michigan Energy Assistance Program (MEAP)
MEAP Energy Security Application

I understand that my signature on this completed application indicates my request for Utility/Heat Source Assistance. I also understand that I will be participating in energy security programming as required and or available in my area.

Section 1 - Household

Applicant Information: This should be information about the account holder or spouse ONLY

<u>Name of applicant: Last, First, Middle</u>		<u>Primary/Cell Phone:</u>	
		<u>Text Updates: Y / N</u>	
<u>Secondary Phone:</u>	<u>Email Address:</u>	<u>Disabled: Y / N</u>	<u>Veteran: Y / N</u>
<u>Text Updates: Y / N</u>			
<u>*My home has some form of income: Y / N</u>	<u>MDHHS Case ID:</u>	<u>Applicant Social Security Number:</u>	<u>Applicant Date of Birth:</u>

*If you chose N (No) for household income, please understand you will only be offered a One-Time Assist and not an Affordable Payment Plan

Household Information

Attach extra pages if you need to include additional household members. List everyone who lives in your home, including adults and children temporarily absent due to illness or employment. People are considered members of your household if they sleep and keep their belongings in your home.

Name	Relationship to You	Social Security Number	Date of Birth

Household Address (Service Address)

<u>Address (Numbers & Street Name, Apt., etc.)</u>		<u>City</u>
<u>State</u>	<u>County</u>	<u>Zip Code</u>

Mailing Address, if different than above – Same as above Yes

<u>Address (Numbers & Street Name, Post Office Box)</u>		<u>City</u>
<u>State</u>	<u>County</u>	<u>Zip Code</u>

Section 2 – Utility Information–

Utility Information:

<u>Home Heating Credit (HHC): Have you applied for or received the HHC (Energy Draft) in the last 6 months?</u>	<input type="checkbox"/> Yes, month received _____ <input type="checkbox"/> No
<u>Have you received Energy assistance from another agency or through a provider sponsored program since October 1?</u>	<input type="checkbox"/> Yes, who was the provider? _____ <input type="checkbox"/> No

Consumers Energy PIPP Program Report out to MPSC Staff

MEAP Energy Security Application



Electric (non-heat) Provider Information

Name and address of company / energy provider	Account number
Service address	Name on account

Household Heating Provider Information

Name and address of company / energy provider	Account number
Service address	Name on account

How do you heat your home? Natural Gas Propane Wood No Heat Obligation
 (Select One) Fuel Oil Electric Heat* Coal Other _____

What is the total amount owed on your bill at this time? \$ _____
 (Please provide a copy of your most recent bill)

*Payment for deliverable fuel will not be made if, at the time of delivery, it is confirmed that you have more than 25 % of the fuel remaining in your tank. Electric heat sources include solar panels, boilers, radiators, or baseboard heating but DO NOT include space heaters.

Section 3 – Energy Security Plan

The United Way of South Central Michigan will also work with you to develop an energy security plan, which could have multiple components.

- Affordable Payment Plan (APP) – An APP provides you a percentage off your monthly bill for up to two years. In addition, your past due balance is forgiven over the course of the program as long as you make your monthly payments on time and in full. The following companies have APP’s – Consumers Energy, DTE, SEMCO and UPPCO. If you have Zero income, you may be eligible for a Pilot Program APP through Consumers Energy.
- Information on how to enroll in your utility provider’s online system, which could include information on your energy usage and text reminders on when your utility bill will be due (if available through utility provider)
- Needs assessment and short-term case management
- Budget - Complete the budget worksheet below with all of your households income and expenses

Other than my Utility Bill, I need help with: * (Check all that apply)

- I am in need of transportation
- I struggle to afford good food
- I am in need of daily living supplies
- I am in need of rent/mortgage assistance (Please circle one)
- I am in need of a place to stay
- I am in need of a job or better employment
- I am in need of health insurance or help with prescription co-pays
- I would like to do a household budget
- I am in need of resources for my mental and emotional wellbeing
- I am I need of: (Other) _____
- I do not need additional resources at this time

*Checking the boxes does not guarantee that we will be able to resolve your immediate needs; however, we are committed to working alongside you to connect you with local resources.

Consumers Energy PIPP Program Report out to MPSC Staff

MEAP Energy Security Application



In addition, I would like to access the following services: (Check all that apply)

- I would like to participate in a private Facebook group with other customers, where I can share and receive information about resources in my community and win cool prizes
- I am interested in participating in an online program that covers topics such as understanding savings and spending, credit, and managing my budget
- I am interested in Budget Coaching (over the phone)
- I would like information on a program that helps with weatherization and energy efficiency for my home
- I am interested in learning more about the FamilyWise Prescription Discount Card, which could save my household money on prescription drug costs
- I would like monthly email tips (includes information such as energy savings tips and where to access local resources)
- I would like to participate in a Financial Workbook group where I have an opportunity to receive gift cards for successfully completing each workbook
- I am not interested in any additional services at this time

Budget coaching readiness assessment: (Check all that apply)

- I really need to improve my financial situation
- I would love to, and need to, learn new financial skills
- I need honest, outside perspective
- I am committed to learning how to better manage my finances. I understand this takes time and effort on my part
- I would benefit from an accountability partner to help me stick to my commitments and goals
- I know that if I don't change my actions and current habits, it could hinder my success
- Having to be accountable to deadlines and reporting milestones motivates me as a person
- I am eager and willing to make changes, to have the life I want
- I am not interested in Budget Coaching at this time

Continue to the next page to complete your required budget worksheet and the signature page!

Consumers Energy PIPP Program Report out to MPSC Staff

MEAP Energy Security Application



Monthly Budget:	
Monthly Income:	Current:
Gross Employment Wages (Before Taxes & Deductions)	\$ _____
Self-Employment	\$ _____
Unemployment Income	\$ _____
Child Support	\$ _____
Alimony	\$ _____
Pension/Annuity	\$ _____
Support from Family/Friends	\$ _____
Retirement	\$ _____
Social Security (Disability - SSD)	\$ _____
Social Security (Supplemental- SSI)	\$ _____
Social Security	\$ _____
Worker's Compensation	\$ _____
Veteran's Benefits	\$ _____
FIP	\$ _____
TANF	\$ _____
Food Benefits (EBT)/WIC	\$ _____
Housing Assistance	\$ _____
Medical Assistance	\$ _____
Childcare Assistance	\$ _____
Other income (Please Specify):	\$ _____
TOTAL INCOME:	\$ _____
Monthly Expenses:	Current:
Rent/Mortgage	\$ _____
Rental/Homeowners Ins. (if NOT included in monthly pmt.)	\$ _____
Property Tax (if NOT included in monthly pmt.)	\$ _____
Gas/Heating	\$ _____
Electric Service	\$ _____
Water Bill	\$ _____
Child Care	\$ _____
Groceries (Include your EBT/WIC amount)	\$ _____
Vehicle Payment	\$ _____
Vehicle Insurance	\$ _____
Transportation (gas, bus, taxi, ride share cost)	\$ _____
Health Insurance	\$ _____
Prescription Cost	\$ _____
Medical Bills	\$ _____
Student Loans	\$ _____
Credit cards	\$ _____
Cable/Internet (Provider: _____)	\$ _____
Phone (Provider: _____)	\$ _____
Check Cashing fees	\$ _____
Payday loans	\$ _____
Child Support (Paid)	\$ _____
Garbage Service	\$ _____
Household Supplies	\$ _____
Other expense (Please specify)	\$ _____
TOTAL EXPENSES:	\$ _____

Consumers Energy PIPP Program Report out to MPSC Staff

MEAP Energy Security Application



Section 4 – Signature Requirements

Please check one and sign below, otherwise this application will be considered incomplete.

<input type="checkbox"/>	I have been informed if my energy provider offers an APP and understand whether or not I am eligible Note: Consumers Energy, DTE, SEMCO and UPPCO offer Affordable Payment Plans. If your household has income you are eligible. Ask your United Way of South Central Michigan Case Manager about alternative programs such as CARE Plus and the 0-19% Pilot.
<input type="checkbox"/>	I agree to the terms and conditions of the Affordable Payment Plan offered by my energy provider and have received a list of the terms and conditions of this plan (please see the last page of this application for the terms and conditions).
<input type="checkbox"/>	I do not want to enroll in an affordable payment plan to receive monthly assistance with my energy bill and would like a One-Time payment on my energy bill.
Signature of applicant or spouse	
Date	

Please sign below after reading the following information, otherwise this application will be considered incomplete.

<input type="checkbox"/>	As part of the MEAP agreement, I understand that I may be referred to or required to participate in additional services such as budgeting assistance, energy audits, or other programs that will help your household pay energy bills and understand energy consumption. Participation in the activities outlined in this plan/agreement are required in order to receive any additional energy assistance benefits.		
<input type="checkbox"/>	I authorize the assisting agency or provider to release my name and address to the local weatherization operator as part of the Weatherization Referral system. I authorize the department to release case and payment information to the Department of Health and Human Services, its affiliates and/or contracted agencies, for the purpose of research, study and evaluation of the Low Income Home Energy Assistance Program (LIHEAP) and the Michigan Energy Assistance Program (MEAP).		
<input type="checkbox"/>	I authorize my energy company to release by phone, fax, email or their computer web site all available information about my account.		
<input type="checkbox"/>	I will allow MEAP providers to share my information for the sole purpose of facilitating enrollment into an alternative or additional MEAP funded program.		
<input type="checkbox"/>	UNDER PENALTIES OF PERJURY, I SWEAR OR AFFIRM THAT THIS APPLICATION HAS BEEN EXAMINED BY OR READ TO ME. IF I AM A THIRD PARTY APPLYING ON BEHALF OF ANOTHER PERSON, I SWEAR THAT THIS APPLICATION HAS BEEN EXAMINED BY OR READ TO THE APPLICANT. TO THE BEST OF MY KNOWLEDGE, THE FACTS ARE TRUE AND COMPLETE.		
Signature of Applicant or Spouse	Date	Phone Number:	
Signature of UWSCMI Representative	Date	Signature of agency representative (if applicable)	Date

You can return you application to us using any of the following methods:

Mail to:

United Way of South Central Michigan
 Program Assistance Center
 P.O. Box 987
 Jackson, MI 49204-0987

Email to:

pac@uwenergyhelp.org

Fax to:

517-539-8001

Text to:

989-272-1792

If you have questions, you can call us at 517-741-0202.

Consumers Energy PIPP Program Report out to MPSC Staff

Appendix E – CARE MB Communication Letters

CARE MB Enrollment Welcome Letter



October 1, 2024

Customer
Address Line 1
Address Line 2

Service Address 123 MAIN ST. JACKSON MI 49201
Enrollment Date: xx/xx/20xx
Dear [Customer First Name],

Welcome to the Consumers Energy CARE Program! As an active participant, you will receive the following benefits:

- **A monthly payment of \$[00.00]**
- The past due balance you had at enrollment, up to \$3,000, will be gradually forgiven.
 - o Up to \$600 will be forgiven upon enrollment into CARE.
 - o Up to an additional \$600 will be forgiven after completion of 1 year in the program. If needed, up to \$1,800 of your remaining arrears will be forgiven when you graduate from the program.

What you need to know:

- Every month, your bill will include your actual energy use and cost as well as the CARE payment amount. This will make budgeting easier. For an explanation of your new bill, see the enclosed example.
- Every 6 months, we'll review your account to compare your actual energy cost with your CARE payment amount. If your actual energy cost was higher or lower than the cost covered, your CARE payment amount **may increase or decrease**.
- Every 12 months, we'll balance your account. If you used more energy than you paid for, we'll include the difference on your bill. If you used less, we'll credit your account. If you have a credit balance on your energy account at the end of the CARE program, the credit will be applied to the following bills until the credit runs out.

You will start seeing these changes on your first billing statement after joining CARE. Be sure to pay your bill on time so we can continue to offer you these great benefits for the next two years. Non-energy charges are not included in the monthly CARE payment (e.g. Appliance Service Plan). These fees and charges are still your responsibility while enrolled in CARE. If you are struggling to pay your bill, please reach out to your enrolling agency.

We look forward to supporting your success in the CARE Program!

Sincerely,

Energy Assistance Team
ConsumersEnergy.com/Assistance

Explore more assistance programs at ConsumersEnergy.com/Assistance.

Consumers Energy PIPP Program Report out to MPSC Staff

CARE MB Late Payment Letter

October 1, 2024

Customer
Address Line 1
Address Line 2

Account # 103012341234
Service Address 123 MAIN ST. JACKSON MI 49201
Enrollment Date: xx/xx/20xx

Dear [Customer First Name],

We noticed you have missed one or more payments on the CARE program. To stay in the program and continue receiving benefits, make a payment today. * Make a payment online by visiting ConsumersEnergy.com or by phone at 800-477-5050.

We understand financial emergencies happen. If you are unable to make an immediate payment, please contact the agency that helped you enroll in CARE to learn about assistance options. Keeping the lines of communication open with your agency is a key factor to your continued position in the program.

As part of the CARE program, you are receiving:

- Reduced monthly payments
- Forgiveness of your past due amounts
- Protection from shut-off while you are enrolled in the CARE program

We want you to continue receiving these benefits, so please make your payment soon.

Thank you for trusting us with your energy needs.

Sincerely,

Energy Assistance Team
ConsumersEnergy.com/assistance

**If you are de-enrolled due to nonpayment, you will be responsible for the total amount due on your account including any past-due amounts that were deferred while you were enrolled in CARE. As a reminder, you are also responsible to pay non-energy charges (e.g., Appliance Service Plan) even while in the program.*

Explore more assistance programs at ConsumersEnergy.com/assistance.

Consumers Energy PIPP Program Report out to MPSC Staff

CARE MB Default Letter



Count on Us®

Month 1, 20XX

Customer
Address Line 1
Address Line 2

Account # 103012341234
Service Address 123 MAIN ST. JACKSON MI 49201
Enrollment Date: xx/xx/20xx

Dear [Customer First Name],

We noticed you have missed one or more payments on the CARE program. **To stay in the program and continue receiving these benefits, please make a payment of \$[xxx.xx] by [xx/xx/20xx]. ***

As part of the CARE program, you are receiving:

- Reduced monthly payments
- Forgiveness of your past due amounts
- Protection from shut-off while you are enrolled in the CARE program

Failure to make a payment by the due date will result in de-enrollment and loss of benefits.

If you are unable to make an immediate payment, please contact the agency that helped you enroll in CARE to explore assistance options.

We want you to continue receiving these benefits, so please make your payment today.

Thank you for trusting us with your energy needs.

Sincerely,

Energy Assistance Team
ConsumersEnergy.com/assistance

*If you are de-enrolled due to nonpayment, you will be responsible for the total amount due on your account including any past-due amounts that were deferred while you were enrolled in CARE. As a reminder, you are also responsible to pay non-energy charges (e.g., Appliance Service Plan) even while in the program.

Explore more assistance programs at ConsumersEnergy.com/assistance.

Consumers Energy PIPP Program Report out to MPSC Staff

CARE MB De-enrollment Letter



August 4, 2021

CUSTOMER NAME
STREET
CITY, STATE ZIP

Account #
Service Address

Dear NAME,

Unfortunately, a payment was not received by the required due date. As a result, your account has been de-enrolled from the Consumers Energy CARE Program as of July 23, 2021.

As a CARE member, you received \$0.00 in benefits. You will no longer receive CARE benefits in the future. Your remaining past due balance of \$674.92 has been re-applied to your account and will be your responsibility to pay.

Help paying your bill may still be available through agencies in your area. Dial 2-1-1, visit mi211.org to learn more today or visit www.ConsumersEnergy.com/assistance to learn more.

If you need additional help with your Consumers Energy bill, we recommend the following services:

- Apply for the Michigan Home Heating Credit to get money back from last winter's heating costs. The applications can be submitted January through September.
 - You do not have to file income taxes to qualify or apply for this credit. To find out more or to get help, dial 2-1-1 or visit MichiganFreeTaxHelp.org and click "Important Tax Credits."
- Change your bill due date to better fit your schedule. Visit www.ConsumersEnergy.com/smartenergy to choose your new bill due date.
- Schedule a free home energy assessment and learn about energy efficiency upgrades that will help reduce your energy bills by calling 877-448-9433 or visiting ConsumersHelpingNeighbors.com.

If you need help figuring out which assistance option is right for you, call Consumers Energy at 877-477-5050 to discuss your specific situation. We are here to help!

Sincerely,

Energy Assistance Team

Consumers Energy
One Energy Plaza Jackson, MI 49201

Contact us at
ConsumersEnergy.com/assistance

Consumers Energy PIPP Program Report out to MPSC Staff

CARE MB Review Letter

Month 1, 20XX

Customer
Address Line 1
Address Line 2

Account # 103012341234
Service Address 123 MAIN ST. JACKSON MI 49201
Enrollment Date: xx/xx/20xx

Dear [Customer First Name],

We appreciate your continued participation in the CARE program. Every 6 months we review your account to determine if your monthly payment amount needs to be adjusted to reflect your actual energy cost. Based on your current energy use, your monthly payment amount needed to be adjusted.

Starting next month, **your new monthly payment will be \$[00.00]**. You will start seeing these changes on your next billing statement.

We recommend the following services to further help you in reducing your energy bills:

- Schedule a free home energy assessment for free installation of energy saving products and to learn about additional energy efficiency upgrades that will help reduce your bills by calling 877-448-9433 or visiting ConsumersHelpingNeighbors.com.
- Apply for the Michigan Home Heating Credit to get money back from last winter's heating costs. The applications can be submitted January through September.
- You do not have to file income taxes to qualify or apply for this credit. To find out more or to get help, dial 2-1-1 or visit MichiganFreeTaxHelp.org.

Thank you for your participation in the CARE Program. We look forward to continuing to support your success.

Sincerely,

Energy Assistance Team
ConsumersEnergy.com/assistance

Explore more assistance programs at ConsumersEnergy.com/assistance.

Consumers Energy PIPP Program Report out to MPSC Staff

CARE MB Pre-Graduation Letter

October 1, 2024

Customer
Address Line 1
Address Line 2

Dear [Customer First Name],

Congratulations you are on track to successfully complete the Consumers Energy CARE program on [Sept. XX, 2023]. As a CARE member, you received the following benefits while enrolled in the program:

- A portion of your monthly energy bills were paid totaling **\$(xxx.xx)** through your most current bill.
- Your past due balance at the time of enrollment in the amount of **\$(xxx.xx)** has been forgiven.
 - o Please be advised that any past due balance you had at the time of enrollment into CARE greater than \$3,000 will be applied to your next bill following graduation.

To support your continued success, we recommend the following services:

- Schedule a FREE home energy assessment and learn about various energy efficiency upgrades that will help reduce your energy costs by calling 877-448-9433 or visiting ConsumersHelpingNeighbors.com.
- Apply for the Michigan Home Heating Credit (HHC) to recover some of last winter's heating costs. The applications can be submitted January through September. You do not have to file income taxes to qualify or apply for an HHC. To find out more or to get help, dial 2-1-1 or visit MichiganFreeTaxHelp.org.
- Change your bill due date to better fit your schedule. To qualify, you must have an upgraded electric meter on your home. Visit ConsumersEnergy.com/smartenergy to select your new bill due date.
- Enroll in Billing and Payment Alerts to receive notifications when your bill is ready, or payment is due, by visiting ConsumersEnergy.com or by calling 800-477-5050.

Thank you for being a valued customer and your successful participation in our CARE Program.

Sincerely,

Energy Assistance Team
ConsumersEnergy.com/assistance

Explore more assistance programs at ConsumersEnergy.com/assistance.

Consumers Energy PIPP Program Report out to MPSC Staff

CARE MB Graduation Letter

Month XX, 20XX

Customer
Address Line 1
Address Line 2

Dear [Customer First Name],

Congratulations you have successfully completed the Consumers Energy CARE program. As a CARE member, you received the following benefits while enrolled:

- A portion of your energy bills were paid by CARE, totaling **[\$xxx.xx]**.
- Your past due balance at the time of enrollment was paid in the amount of **[\$xxx.xx]**.
 - o Please be advised this program allows for up to \$3,000 in arrears forgiveness, any balance exceeding that will be applied to your first bill after graduation.

To support your continued success, we recommend the following services:

- Schedule a FREE home energy assessment and learn about various energy efficiency upgrades that will help reduce your energy costs by calling 877-448-9433 or visiting ConsumersHelpingNeighbors.com.
- Change your bill due date to better fit your schedule. To qualify, you must have an upgraded electric meter on your home. Visit ConsumersEnergy.com/smartenergy.com to select your new bill due date.
- Enroll in Billing and Payment Alerts to receive notifications when your bill is ready, or payment is due, by visiting ConsumersEnergy.com/alerts or by calling 800-477-5050.
- Our Budget Plan provides the option to spread out your energy costs into equal monthly payments. For more information or to sign up, please visit ConsumersEnergy.com/budgetplan.

Thank you for being a valued customer and your successful participation in our CARE Program.

Sincerely,

Energy Assistance Team
ConsumersEnergy.com/assistance

Explore more assistance programs at ConsumersEnergy.com/assistance.



Consumers Energy PIPP Program Report out to MPSC Staff

CARE Outreach Helping Neighbors (Home Energy Audit)

The CARE participants
From Consumers Energy

[SUBJECT LINE OPTIONS]
OPTION 1: This fall, start saving up to \$150 a year

[PRE-HEADER OPTIONS]
OPTION 1: We can help you find free ways to save energy and money

We're here to help.

Count on Us to Help You Save




[Schedule Now](#)

Saving up to \$150 a year on energy bills is easy. All you have to do is schedule a free Home Energy Analysis. We'll come to your home and show you how you can save money and energy — for free.

What you'll get:

- A free home energy check-up and custom report
- Energy saving products, installed for free
- Continued energy savings all winter long

Your free upgrades may include:

• Smart thermostat • High-efficiency showerhead • Furnace tune-up

[Schedule Now](#)

A Dashboard as Unique as You

Access the Energy Dashboard online or via our App to see your bills, find personalized ways to save and make sure you're on the best rate.

Save energy and money. Count on us to help. [Access Now](#)



Program funds are limited in amount and available in select geographic areas only. Some restrictions apply. Eligibility for each measure is determined at the time of the appointment. To be eligible, the location where the work is performed must contain all gas and electric meters (natural gas and electric) owned by Consumers Energy and the account number must be active. Past participation in the Home Energy Analysis or Helping Neighbors program qualifies account holder for participation in the program. For in-home assessments, an adult 18 years or older must be present at the time of the assessment.

We're Here for You

Choose the most convenient method to contact us.

[Online](#) [Email](#) [877-662-9431](#)

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This message was sent by Consumers Energy.
One Energy Plaza, Jackson, MI 49201
Business Center | @consumers

CARE MB Agency Overview Training

CARE Modified Budget

Program Overview for Enrolling Agencies

Energy Assistance Team



Agenda

- Welcome
- Definitions Page
- CARE MB Program Overview
- CARE MB Eligibility
- CARE MB Credit Tables
- Dunning Process
- Communications
- Agency Touchpoint Calls
- CE PASS Enrollment and Calculator
- CARE Pending Status
- Theft/Fraud
- Contact Information
- Questions and Discussion

Consumers Energy PIPP Program Report out to MPSC Staff

Definitions Page

APP – Affordable Payment Plan
 Arrears – Overdue payment on customer’s account (past due)
 CARE MB – Consumers Affordable Resource for Energy - Modified Budget
 Default – Removal off program due to non-payment
 Dunning – Process levels of communicating to customer when balance becomes past due
 EWR – Energy Waste Reduction
 FPL – Federal Poverty Level
 Graduation – Completion of program
 HHC – Home Heating Credit
 OTA – One Time Assistance
 Reconciliation – Review of account

3

CARE MB Overview

Monthly Customer Payment

- Begins **October 1, 2024**
 - Regardless of enrollment date, clients will be enrolled for a full 2 years.
 - Clients will automatically be enrolled into their second year after 12 months.
- Customer payment amount is based on usage and FPL.
 - Agency payment will remain fixed based on the heating and non-heating seasons.
- Customer monthly payment amount **CAN** change based on consumption after budget reconciliation at completion of 6, 12, and 18 months in the program.
 - Customers who use less energy than projected may receive a lower monthly bill amount, those who use more may have an increased bill amount. These changes will automatically be applied to the next billing cycle.
 - Monthly payments will only change if their new monthly payment will be +/- \$5.

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Consumers Energy PIPP Program Report out to MPSC Staff

CARE MB Overview

Arrears Balance Forgiveness:

- Upon enrollment, past arrears are frozen
- There will be no cap on arrears to be enrolled into CARE MB, and arrears will be paid off in 3 installments:
 - Forgive arrears up front (within the first 30 days of enrollment) to a cap of \$600.
 - Forgive arrears up to the same cap (\$600) at the completion of year 1 (as needed).
 - If needed, up to an additional \$1,800 will be forgiven at graduation.
 - Any customer arrears that exceed the \$3,000 cap will be applied to their first bill after graduation.

Reconciliation of accounts at the 12-month mark:

- Reconciliation credit will be applied to the customer's account if the reconciliation amount is >\$0.
 - This will be an automated process.
 - We will NOT be sending out a customer communication about reconciliation.

Program Graduation:

- Upon graduation, qualifying customers with a balance that is \$75 or less will be automatically enrolled in a Budget Plan.
 - They will receive a graduation letter that will include their budget plan enrollment information.
 - Their new budget plan will automatically begin on the next billing cycle.

No late payment charges and customer **protected from shutoff** while enrolled in CARE MB

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CARE MB Eligibility

A customer will be eligible for an enrollment in the CARE MB if:

- Their income falls between 0%-150% Federal Poverty Level (FPL) guidelines.
 - No exceptions will be needed for customers at the 0-19% FPL level.
- There is no unaddressed theft or fraud on their account.
- They are a residential electric, natural gas, or combination customer.
- Refer for Energy Waste Reduction programs, if under 200% FPL.
 - <https://homeenergyanalysis.com>

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Consumers Energy PIPP Program Report out to MPSC Staff

CARE MB Credit Tables

Important Notes:

- There is no consumption cap.
 - Agency billed amount calculated based on annual income and consumption.
- Annual credit was broken down monthly. It is weighed 70% Nov-May and 30% Jun-Oct to be inline with the MEAP crisis season and spend guidelines.

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CARE MB Annual Credit Amounts

CARE MB FY25 Monthly Credits

Commodity	FPL Tiers	Usage (average consumption)	Heating Season (November-May)	Non-Heating Season (June-October)	Average Monthly Credit
Combo	Between 0%-75%	High Usage (>\$220)	\$153.00	\$69.00	\$118.00
		Low Usage (≤\$220)	\$30.00	\$5.00	\$19.58
	Between 76%-110%	High Usage (>\$220)	\$111.00	\$42.00	\$82.25
		Low Usage (≤\$220)	\$12.00	\$5.00	\$9.08
Electric Only	Between 0%-75%	High Usage (>\$140)	\$111.00	\$55.00	\$87.67
		Low Usage (≤\$140)	\$24.00	\$5.00	\$16.08
	Between 76%-110%	High Usage (>\$140)	\$83.00	\$37.00	\$63.83
		Low Usage (≤\$140)	\$13.00	\$5.00	\$9.67
Gas Only	Between 0%-75%	High Usage (>\$80)	\$70.00	\$5.00	\$42.92
		Low Usage (≤\$80)	\$5.00	\$5.00	\$5.00
	Between 76%-110%	High Usage (>\$80)	\$50.00	\$5.00	\$31.25
		Low Usage (≤\$80)	\$5.00	\$5.00	\$5.00
	Between 111%-	High Usage (>\$80)	\$30.00	\$5.00	\$19.58
		Low Usage (≤\$80)	\$5.00	\$5.00	\$5.00

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Consumers Energy PIPP Program Report out to MPSC Staff

Dunning Process

- Warning letter at one monthly payment amount past due (due date plus 4 days)
- Default letter at two monthly payments past due (due date plus 34 days)
- Phone call four days after Default letter mailed out
- De-enrolled after failure to pay by 2nd warning due date (De-enrollment letter sent)
- All past due is owed upon program default

Communications

- Welcome Letter
 - Welcome Letter for FY25
 - Sample Bill
 - Customers income assistance credit will show as a separate line item on the bill.
- Budget Review Letter (if monthly payment amount changes)
- Default Letters (if applicable)
- Pre-Graduation Letter
- Graduation Letter

August Energy Bill Invoice: 901012448364

CARE Program and Other Charges Summary	
Total CARE Amount Due from Last Month	\$0.00
CARE Monthly Plan Amount	\$50.00
Amount Due	\$50.00

Electric Charges	
Energy First 600 kWh	800kwh 0105178 352.11
Energy Over 600 kWh	513hr 0129406 347.18
PSCB	111hr 8007040 17.61
System Access	
Income Assistance Credit	
123647 Deferral Surcharge	111hr 8039623 20.71
Distribution	111hr 6008110 950.27
FCM Incentive	111hr 6000706 50.12
Power Plant Surtaxation	111hr 6201597 11.24
Low-Income Asset Fund	
Total Electric	\$207.68
State Sales Tax	18.77
Total Energy Charges	\$215.95

Amount Due: \$50.00	
by September 21, 2021	

If you pay after the due date, a 2% late payment charge will be added to your next bill.

DETAILED SUMMARY	
Total CARE Amount Due Last Month	\$241.11
CARE Program Back Balance	\$291.00
Payment on August 31, 2021	\$241.11
CARE Monthly Credit	\$183.90
Total Energy Charges	\$215.95
Customer Account Balance	\$251.02

Payments applied after Aug 16, 2021 are not included.

Customer should receive a bill for this amount on CARE Program.

Please make any inquiry or complaint about this bill before the due date listed on the front. Visit ConsumersEnergy.com/AboutEBill for details about the above charges.

Consumers Energy PIPP Program Report out to MPSC Staff

Agency Touchpoints

- Planning to follow same agenda as CARE:
 - Status Report: Barriers/Issues/Successes
 - Review One Pager
 - Review Forecast
 - Continuing Enrollments?
 - Enrollments Counts
 - Current Enrollment Count?
 - How many in pending?
 - How many denied?
 - Denial Reason?
 - Invoicing/customer status report questions?
 - Round Table Discussion

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CE PASS Enrollment Process

PIPP/CARE Program

Make a selection below to request a change in account status.

- Pending Enrollment
- Enroll
- Deny
- Expire
- Move-In Revalidate
- Annual Revalidate
- Pending Annual Revalidation
- Change Federal Poverty Level %

PIPP/CARE Authorization ID Electric:

History

There is no CARE/PIPP Program History for this account.

The image shows a dropdown menu with a white background and a blue border. The text inside the menu is: "--Select Program--" (twice) and "CARE Modified Budget Plan". The "CARE Modified Budget Plan" option is highlighted in a dark grey color. A small downward-pointing arrow is visible on the right side of the menu.

Select Enroll

Drop down to select CARE MB

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Consumers Energy PIPP Program Report out to MPSC Staff

CE PASS Enrollment Process - Calculator

PIPP/CARE Program
Make a selection below to request a change in account status.

- Pending Disenrollment
- Enroll
- Deny
- Expire
- Move to Revalidate
- Annual Revalidate
- Pending Annual Revalidation
- Change Federal Poverty Level

PIPP/CARE Authorization ID Electric:

History
There is no CARE/PIPP Program History for this account.

Select Enroll.

Select CARE MB.

Select FPL range.

Enter FPL %.

Click Simulate to preview the estimated monthly plan amount.

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CE PASS Enrollment Process

PIPP/CARE Program
Make a selection below to request a change in account status.

- Pending Disenrollment
- Enroll
- Deny
- Expire
- Move to Revalidate
- Annual Revalidate
- Pending Annual Revalidation
- Change Federal Poverty Level

PIPP/CARE Authorization ID Electric:

History
There is no CARE/PIPP Program History for this account.

PIPP/CARE Program History

Date	Status	Reason	Additional Information	Federal Poverty Level	Program Option	Organization	Phone	Start Date	End Date	Monthly Plan Amount
7/8/2024	Enroll	Agency Request	CARE Program 0	110% FPL	Agency Funded - 24 month Program	Sanjour Energy	sanjour@ce.com	7/8/2024	7/7/2025	\$20.00

To continue with enrollment, enter customer's email (not required but strongly encouraged).

Enter CARE Authorization ID number. (Field can be electric, gas or both)

Click on Submit.

After you click submit, you will see the summary of the customer's enrollment.

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Consumers Energy PIPP Program Report out to MPSC Staff

CE PASS CARE Pending Status

Main reason you would use CARE Pending Status is if the customer is disconnected. The pending status will allow for reconnection without payment required.

- Click on Pending Enrollment.
- Choose CARE Modified Budget Plan.
- Choose one of the four reasons from the drop-down box.
- Enter Authorization ID (can be Electric, Gas or both).
- Click Submit.
- Direct the customer to call our 800-477-5050 number in order to be reconnected.

PIPP CARE Program

Make a selection below to request a change in account status:

<input checked="" type="radio"/> Pending Enrollment <input type="radio"/> Credit <input type="radio"/> Debt <input type="radio"/> Evict <input type="radio"/> Move-In Rentable <input type="radio"/> Annual Rentable <input type="radio"/> Pending Annual Reconciliation <input type="radio"/> Change Federal Priority Level 3	CARE Modified Budget Plan Application received and being processed	Additional information (customer provided, do not change unless requested)
---	---	--

PIPP/CARE Authorization ID Electric:

Enrolling an Account that has Fraud/Theft Marked Yes

Account Number: 1102420200
 First Name: LEVY
 Service/Delivery Address: 54 ALDEN AVE W
 BATTLE CREEK MI 49014 4114
 Account Type: Residential
 Bankruptcy? Yes No

Account Status: Final Elec
 Last Name: HOYES
 Billing/Billing Address: 54 ALDEN AVE W
 BATTLE CREEK MI 49014 4114
 Move-In Service Date: 06/12/2023
 Theft? Yes No
Wegal case under investigation, Please call Theft Hotline: 1-855-347-3878.

Business Partner Number: 109267772
 Telephone Number: 269289933
 Move-Out Service Date: 12/31/9999
 Fraud? Yes No

Customers that are marked Fraud or Theft are blocked in CE Pass from enrollment.

Account Number: 1102977201
 First Name: WELSH
 Service/Delivery Address: 1315 1941 WOOD DR
 LUDING MI 49627 8609
 Account Type: Residential
 Bankruptcy? Yes No

Account Status: Current
 Last Name: WELSH
 Billing/Billing Address: 802 E 10TH STREET RD
 GREENEVILLE MI 49617 4158
 Move-In Service Date: 08/07/2022
 Theft? Yes No

Business Partner Number: 10460108
 Telephone Number: 269-254-2211
 Move-Out Service Date: 12/31/9999
 Fraud? Yes No
Please call Fraud Hotline at Consumers Energy: 1-810-700-1245.

Call number in red.

Contact

Assistance and CE PASS questions:
EnergyAssistance@cmsenergy.com

CARE Modified Budget questions:
POBoxCARE@cmsenergy.com

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Consumers Energy PIPP Program Report out to MPSC Staff

Care MB Agency Terms and Conditions**Consumers Energy**

CARE Modified Budget Terms and Conditions



CARE Modified Budget (CARE MB) is an affordable payment plan for income qualified households. CARE MB allows customers to make affordable monthly payments based on their consumption history, with a portion of their energy bill being paid with energy assistance funds.

1. Federal and State Eligibility Criteria:

- Customer must be an active residential Consumers Energy account holder (electric and natural gas) or the domestic partner of an account holder.
 - CARE MB enrollment in conjunction with a State Emergency Relief (SER) can be used for customers to establish service in their name.
- Customer must NOT have unaddressed theft/fraud on the account. If theft or fraud is identified while on the program, the participant may be removed.
- Customer must have household income under 150% Federal Poverty Level (FPL).
 - Income validated by receiving SER assistance

2. Program Benefits:

- 24 months of affordable monthly payments.
- Past due balance is frozen in a CARE MB Installment Plan (IP) at the time of enrollment and will be paid off over time, up to \$3,000, as long as the customer is actively enrolled in CARE MB.
 - Payments up to \$600, as needed, are made at enrollment, up to an additional \$600, as needed, at the 12 month mark and a final payment, if needed, up to \$1,800.
 - The monthly CARE MB credit is only applied towards energy charges. Non-energy charges (e.g. Appliance Service Plan) are still your responsibility in addition to your monthly CARE bill.
- The electric and/or natural gas services are protected from shutoff while enrolled in the plan.

3. Moving while enrolled in CARE MB :

- No deposit or reconnect fees.
- Notify Consumers Energy at 800-477-5050.
- No need to reapply for CARE if new service is established within 30 days.
- CARE payment amount may change based on energy use history at new address.

If you have any questions or concerns, please do not hesitate to contact your enrolling agency.


CARE MB is an easy way to manage your monthly energy bills. Once enrolled, all you have to do is pay your bill on time each month!

Consumers Energy PIPP Program Report out to MPSC Staff

CARE MB Agency one-pager

CARE Modified Budget

FOR AGENCY INTERNAL USE ONLY



PROGRAM BENEFITS:

24 month program

- Regardless of enrollment date, clients will be enrolled for a full 2 years.
- Clients will automatically be enrolled into their second year after 12 months.

Monthly Benefit

- Customer payment will be calculated based on past usage. Agency payment will remain fixed and will be based on consumption and FPL.
- Customer monthly payment amount MAY change based on consumption after budget review at completion of 6, 12, and 18 months in the program.
 - Customers who use less energy than projected will receive a lower monthly bill amount, those who use more will have an increased bill amount. These changes will automatically be applied to the next billing cycle.
 - Monthly payments may change by +/- \$5 depending on consumption.

Account Balance Forgiveness:

- Upon enrollment, past arrears are frozen
 - Within the first 30 days of enrollment up to \$600 of the customers arrears will be forgiven.
 - Up to an additional \$600 will be forgiven after completion of 1 year in the program. If needed, up to \$1,800 will be forgiven upon graduation.
 - Any remaining arrears owed beyond this \$3,000 will be applied to the first bill after graduation.

Holds:

- Clients receive a 30-day Eligibility Determination hold upon applying for SER through MIBridges
- If approved, they receive another 30 day hold for the SER payment to be applied to their account and get co-pay assistance if necessary

No late payment charges and customer **protected from shutoff** while enrolled in CARE

ELIGIBILITY CRITERIA:

- Income falls below 150% Federal Poverty Level (FPL) guidelines
 - Exceptions can be requested by the enrollment agency
 - No exceptions will be needed for pilot customers at the 0-20% FPL
- No unaddressed theft or fraud
- Residential electric, natural gas, or combination customer

DEFAULT PROCESS:

Clients will receive two communications prior to de-enrollment:

- 1st Warning notice at 1x monthly payment past due
- 2nd Warning notice at 2x monthly payment past due
- De-Enrollment letter after failure to pay by the due date in the 2nd warning
- All past due amounts are owed upon program de-enrollment including any remaining frozen balance

COMMUNICATIONS:

Clients will receive multiple communications from Consumers Energy:

- Welcome Letter
- Budget Review Letters (if plan amounts change at time of budget review)
- Default Letters (if applicable)
- Graduation Letter

Consumers Energy PIPP Program Report out to MPSC Staff

CREDIT TABLE:

CARE MB FY24 Monthly Credits					
Commodity	FPL Tiers	Usage (average consumption)	Heating Season (November-May)	Non-heating Season (June-October)	Average Monthly Credit
Combo	Between 0%-75%	High Usage (>\$220)	\$213	\$129	\$178
		Low Usage (≤\$220)	\$90	\$54	\$75
	Between 76%-110%	High Usage (>\$220)	\$171	\$102	\$142
		Low Usage (≤\$220)	\$72	\$43	\$60
Between 111%-150%	High Usage (>\$220)	\$128	\$77	\$107	
	Low Usage (≤\$220)	\$54	\$32	\$45	
Electric Only	Between 0%-75%	High Usage (>\$140)	\$141	\$85	\$118
		Low Usage (≤\$140)	\$54	\$32	\$45
	Between 76%-110%	High Usage (>\$140)	\$113	\$67	\$94
		Low Usage (≤\$140)	\$43	\$26	\$36
Between 111%-150%	High Usage (>\$140)	\$85	\$51	\$71	
	Low Usage (≤\$140)	\$32	\$20	\$27	
Gas Only	Between 0%-75%	High Usage (>\$80)	\$100	\$25	\$69
		Low Usage (≤\$80)	\$33	\$8	\$23
	Between 76%-110%	High Usage (>\$80)	\$80	\$20	\$55
		Low Usage (≤\$80)	\$26	\$7	\$18
Between 111%-150%	High Usage (>\$80)	\$60	\$15	\$41	
	Low Usage (≤\$80)	\$20	\$5	\$14	

Consumers Energy PIPP Program Report out to MPSC Staff

Appendix F – CARE MB Partnering Agencies

MEAP Agency	Website	Agency Phone
The United Way of South-Central Michigan	uwenergyhelp.org	517-741-0202
The Heat and Warmth Fund (THAW)	thawfund.org/assistance/	800-866-8429
St. Vincent de Paul Society	helpwithmybill.com	877-788-4623
TrueNorth Community Services	tnempower.org	231-355-5880
Barry County United Way	bcunitedway.org	269-945-4010
The United Way of Southeastern Michigan	unitedwaysem.org/utility-assistance/	844-211-4994
The Salvation Army	salarmy.us/energy	616-929-1645
Bureau of Community Action and Economic Opportunity	micommunityaction.org	Contact your local Community Action Agency

Consumers Energy PIPP Program Report out to MPSC Staff

Agency Newsletter



ENERGY ASSISTANCE NEWSLETTER

Summer 2024

Navigating State Emergency Relief Depletion

The Michigan Department of Health and Human Services announced the state's federal Low Income Home Energy Assistance Program (LIHEAP) funds were depleted in June. This doesn't mean help isn't available, and our commitment to our Michigan neighbors is unwavering.

Until LIHEAP funds are restored, and normal application processes resume on Oct. 1, Michiganders are asked to visit www.bridges.michigan.gov or dial 2-1-1 to be connected with available resources. Our energy assistance programs **remain open, available and ready to help.**

Find Savings in Your Home

There are ways to save energy in almost every room of a home - and Helping Neighbors can find them for eligible customers.

During an in-person or virtual assessment, a trained energy expert will install or send free products for safety, savings and sustainability. Customers receive a customized Home Energy Report with more tips and recommendations. Some may also be eligible for additional free premium upgrades, such as a refrigerator, AC unit and/or a dehumidifier.

For those who don't qualify for Helping Neighbors, the Home Energy Analysis program provides most of the same great services for customers of all incomes.



Make Summer Rates Work for You

Summer rates encourage customers to use less electricity when it's most expensive to produce and buy, which is non-holiday weekdays from 2 p.m. to 7 p.m. from June 1-Sept. 30.

Small adjustments - like doing dishes or laundry in the evening, closing blinds during the day and using fans instead of A/C during peak times - can help keep bills from rising with the temperatures. You can find other ways to help customers beat the heat on our blog at www.bridges.michigan.com.



Tax Credits are Still Available

It may be hard to believe, but colder weather will be here before we know it. That's why Michigan Volunteer Income Tax Assistance (VITA) sites across the state have remained open to ensure eligible families can access key tax benefits until the Oct. 1 deadline.

As a free tax service for low-to-moderate income households, certified and trained volunteers help customers prepare their taxes and access resources like the Home Heating Credit (HHC).

Through Sept. 30, find an open VITA site at michiganvita.org.



Agency Spotlight: United Way of South Central Michigan Q&A with Bethany

Bethany Stutzman, Senior Director of Community Impact Programs and United Way of South Central Michigan (UWSCMI) Jackson Site Lead, shares how social media keeps them connected with clients.



Q: What makes the way UWSCMI engages clients on Facebook so successful?

A: After a few years of utility assistance programming, we started an optional Facebook group to continue providing resources to the people we work with. It's also become a means to give and receive emotional support. While meant for those enrolled in a program like CARE, other people want to stay in the group when no longer in crisis as a source of support.

Q: How does the group change the conversation and experience?

A: We have a standard touchpoint with applicants about 9 months after enrollment to verify they've been able to use the resources and determine if there are other needs. Beyond this, we encourage people to reach out proactively at any time and the Facebook group provides an easy way to do that.

Q: What advice would you give organizations who want to do something similar?

A: It's a private Facebook group restricted to our clients enrolled in MEAP and one of the communication's channel options we provide when they are enrolling. If they are interested, we walk them through how to join. You can make it happen with relatively low effort, but the amount of work you put in directly affects what you get. We have about 300 clients active in the group, which is low relative to the number of people we serve but the feedback and insights provide high value for all. We see more engagement with giveaways for gift cards, Gifts of Energy and bigger items like laptops.

Q: Is there anything else we should know?

A: I don't think we can underscore enough how taxing it is on mental health to be in perpetual situations of figuring out how to pay bills and put food on the table. This is a small thing that provides meaningful extra support. I think that's why we get so excited about this. Not just the fact that people have access to additional resources, but they get support from others who understand.

Have something to share or need support? Email energyassistance@cmenergy.com to reach our team.

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Consumers Energy PIPP Program Report out to MPSC Staff

Agency Newsletter



ENERGY ASSISTANCE NEWSLETTER

Heating Season 2023-2024

Keeping Costs Fair

On Oct. 1, 2023 we implemented a flat \$2.99/transaction fee for residential energy bill payments made with a debit or credit card. This helps assure only those who prefer this payment method are responsible for any costs associated with their use. The amount is added to the bill at the time of payment if a card option is selected.

We are closely monitoring potential impacts to our assistance program customers and will communicate with you about any necessary updates. A list of payment channels and methods - including fee-free options - is available at ConsumersEnergy.com/WhatToBuy.

Show Me the Money Day:

Help Michiganders achieve financial stability and empowerment with help from the Community Economic Development Association of Michigan (CEDAM) partners.

The free events feature:

- Financial workshops, including help applying for tax credits like the Home Heating Credit.
- Community resources.
- Free and low-cost financial products.

Visit cedamichigan.org/moneyday/ to schedule your local event.



Speaking Their Language:

More than 400,000 Michiganders speak a language other than English. To reach more of our customers in a meaningful way, through 2024 we are translating our regulatory required materials (including our updated Assistance brochure) into both Spanish and Arabic. You can view and share these resources at ConsumersEnergy.com/CustomerGuides. Download and print posters and cards to share with your clients at [LINK \(NEED LINK\)](#).



Heating Season Key Dates

OCT. 1	NOV. 1 – MAR. 31	JAN. 20 – SEPT. 30
State Emergency Relief (SER) enrollment begins. Many energy assistance programs require individuals to receive SER first. Visit www.michigan.gov to get started.	Seasonal shut-off protection programs for enrolled senior citizens.	2024 Home Heating Credit applications are available to help with qualified heating expenses.

CARE enrollment begins! This program is offered on a first come, first served basis and helps Michiganders pay their energy bills. Customers must receive State Emergency Relief (SER) before enrolling. Visit ConsumersEnergy.com/Care for more information.



Tools and Tips

Don't fall behind this heating season!

The first step to managing energy bills is reducing what is used - without losing comfort at home. It doesn't take a lot of time, money or effort to make changes that will lower the bill where it begins - outside! Start finding savings today at ConsumersEnergy.com/Save.

Carbon monoxide (CO) is odorless, invisible and extremely dangerous. It's also avoidable. This deadly gas can be produced by fuel-burning sources such as natural gas appliances, generators and vehicles. It's important to not only recognize the signs of CO poisoning and know how to react, but to also have a working alarm installed on all floors of a building. To help save lives, all SER assistance users must have working carbon monoxide detectors or alarms installed as of December 2023.

Help spread the word about our assistance options. Please share on your own channels our latest assistance blog at cedamichigan.com.



Have content you want to see?

Let us know! Send us topics of interest, share your own local wins or submit a testimonial. Create Form 818c. [HERE](#).



Scammers can be convincing. ConsumersEnergy.com/Scams can help you learn how to help your clients avoid them.



Make every dollar count! Visit ConsumersEnergy.com/Save to connect your clients with energy-saving measures.



Help comes in many forms, and accepting it now allows you to pay it forward in the future. Find options for everyone at ConsumersEnergy.com/Assistance.

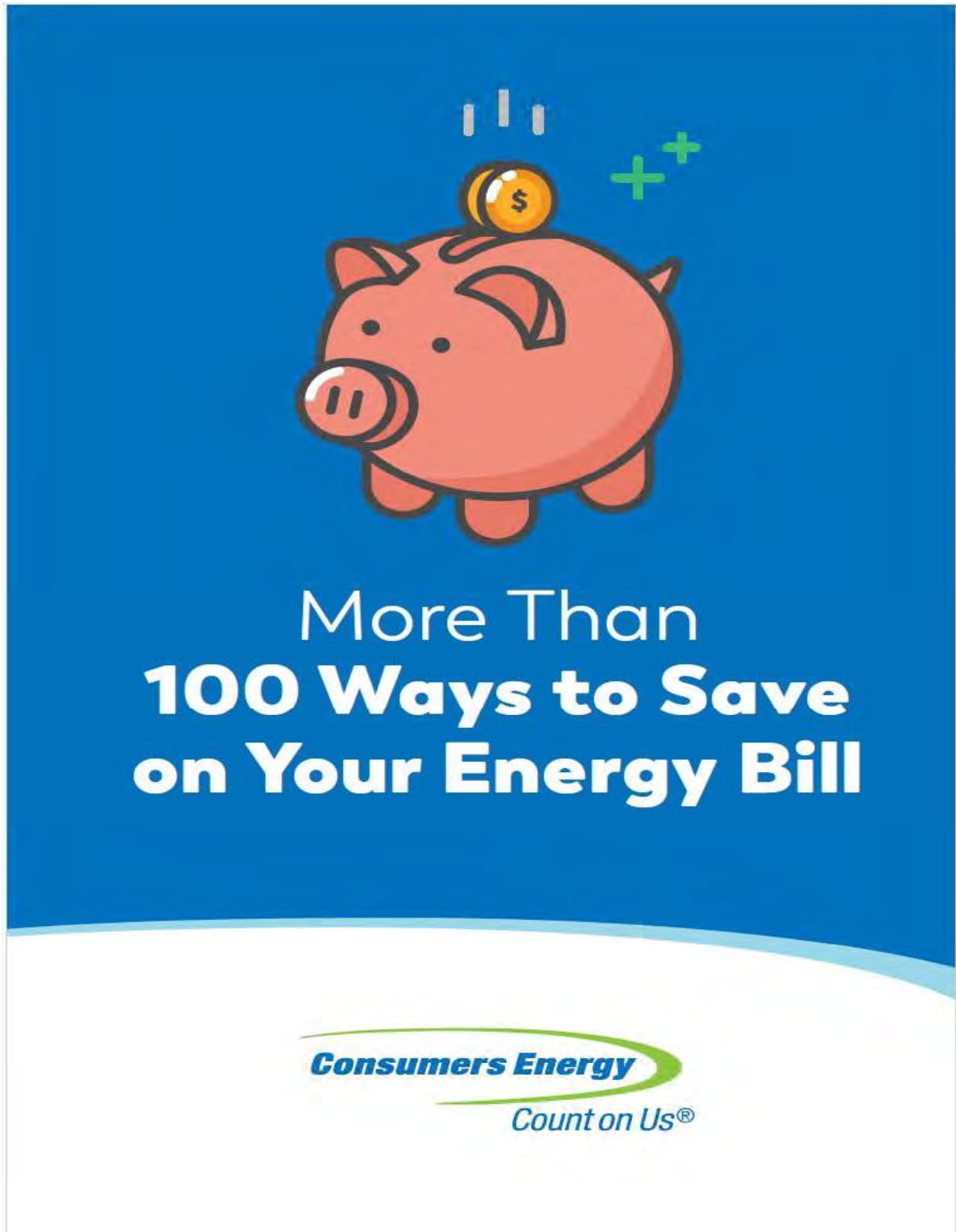
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Consumers Energy *Count on Us*

Appendix G – Energy Efficiency Communications

Ways to Get Assistance



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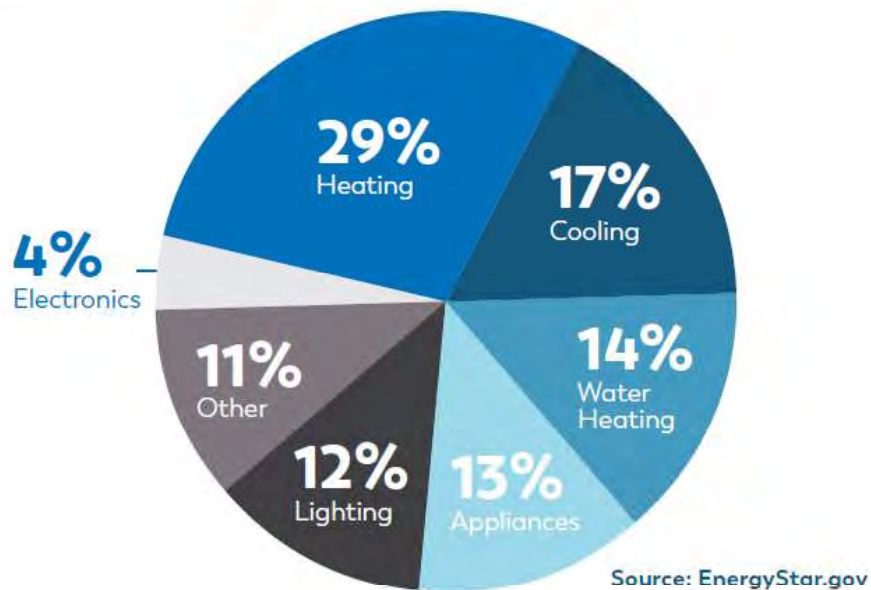
Save Money by Saving Energy

Looking for ways to save money? We can help.

If you're like most people, you're already doing some things to cut down on energy use, such as lowering the heat at night. To help you save even more, we've put together this guide of more than 100 things you can do to make your home more energy efficient, without sacrificing your comfortable lifestyle.

It's simple. When you use less, you'll pay less.

Download this guide as a PDF and view these energy savings tips at ConsumersEnergy.com/saveenergy



Home Energy and You

As much as half of the energy used in your home goes to heating and cooling. So making smart decisions about your home's heating, ventilating and air conditioning (HVAC) system can have a big impact on your energy bills — and your comfort.

Consumers Energy PIPP Program Report out to MPSC Staff

I Home Heating

Heating your home is the largest use of energy and offers the greatest opportunity for savings. About 30 percent of your total home energy budget goes for heating.

- » Have your heating system tuned and inspected by a service professional before each heating season. Heat losses from a poorly maintained system add up over time, sometimes at a rate of 1 percent to 2 percent a year.
- » Clean or replace the furnace filter often during the heating season. Furnaces use less energy if they “breathe” more easily. Follow instructions in the furnace manufacturer’s manual.
- » Keep furniture, carpeting and curtains from blocking heat registers and air return ducts.
- » If radiators are located near cold outside walls, place a sheet of aluminum foil between the radiator and the wall to reflect heat back into the room.
- » Don’t overheat your home and overwork your furnace. Use supplemental heating equipment for hard-to-heat areas.
- » When replacing your furnace, look for one that’s at least 95 percent efficient. If you need to replace your HVAC system, ask your contractor about ENERGY STAR certified units. And make sure that your new energy efficient unit is properly installed for maximum savings.
- » While sleeping, add an extra blanket for warmth.
- » Close your attic, basement, garage and exterior doors to prevent cold drafts and keep in heat.
- » Ceiling fans set at slow speed push warm air away from the ceiling and move it around the room without creating a chilling breeze. This spreads the heat more evenly and will make you feel more comfortable.

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! Your Thermostat

Wi-Fi and programable thermostats are a great way to dial in savings and comfort.

- » Using a programmable thermostat will let you turn heat or air conditioning up when you are home and down when you go to work or to bed. Installing one before the heating season begins could save as much as 20 percent on your heating costs and recover your investment in the first year.
- » In the winter, set your thermostat at 68 degrees when you're home and at 65 degrees when you're away for a short time. If you're used to higher settings, dial down 1 degree at a time until you feel comfortable.
- » Wi-Fi enabled thermostats allow you to control your home's heating and cooling remotely through your smartphone. Many smart thermostats learn your temperature preferences and establish a schedule that automatically adjusts to energy saving temperatures when you are asleep or away.



Remember:
Warmer temperatures are recommended for homes with ill or elderly persons or infants.

! Cooling

Beat the summer heat and stay comfortable with these energy savers.

- » Buy an air conditioner with a high energy efficiency rating (EER). It's printed on the EnergyGuide label attached to the unit.
- » If you have central air conditioning, clean leaves and debris from the unit. To save energy, make sure they're not too close to the compressor because they can block airflow.
- » Install your air conditioner in the shade. When it's in direct sunlight, it uses more energy.

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- » Make sure your central air conditioning system is the right size for the area you want to cool.
- » Clean the furnace filter regularly. Dusty filters make your air conditioner work harder. Check the manufacturer's manual.

Here are more ways to stay cool.

- » Cool air from your window air conditioner can flow into open registers. Cover or close them so cool air doesn't escape.
- » Don't cool unused areas. Close doors and registers to cut energy costs.
- » Operate your stove, oven, dishwasher and clothes dryer in the morning or evening when it's cooler outside. They add extra heat to your home and make your air conditioner work harder.
- » In the summer, set your thermostat at 78 degrees during the day when you're home and higher when you're away.
- » Install an automatic setback or programmable thermostat that starts your air conditioner shortly before you get home.
- » Reduce air conditioning needs by installing an attic fan. Hot air trapped in stuffy attics sinks into rooms below, adding to your summer cooling costs.
- » A ceiling fan cools fast and costs less than air conditioning.

| Water Heater

Water heating is a typical family's third-largest energy expense, accounting for about 14 percent of utility bills.

- » Take a shower instead of a bath. You'll use less hot water.
- » Install a low-flow aerator or flow restrictor on an existing shower head, and you'll use less water when it seems like more! Both are inexpensive and easy to install — just screw them in.

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- » Set your water heater temperature at 120 degrees. A family of four, each showering for five minutes, uses about 700 gallons of water a week. By lowering the thermostat, you can cut water heating bills without sacrificing comfort.
- » Turn off hot water when you don't need it. Don't let it run when you wash or shave.
- » Fix defective plumbing or dripping faucets. A single dripping hot water faucet can waste 212 gallons of water a month. That can increase your water bill and your energy bill.
- » Keep your hot water hot by making sure pipes in unheated areas are insulated.
- » Always use cold water when it will do the job as well as hot.
- » Once a year, drain the water heater tank completely, then turn the incoming water on and off, alternating, for about 20 seconds. These actions flush minerals and sediment from inside the tank and make your water heater more efficient. Some newer models are self-cleaning. Check the manufacturer's manual.



Your Monthly Energy Use:
Your monthly bill from Consumers Energy includes 13 months of your energy use data and cost per day.

I Dishwasher

Your dishwasher uses hot water to do its job.

Here are ways to save on water heating.

- » Set your dishwasher at 120 degrees or "low." Check your manufacturer's manual to see if you can use 120 degree water.
- » Wash only full loads, and use the shortest cycle to get your dishes clean.
- » Turn off the dishwasher after the wash and rinse cycles. When dishes air dry, you'll save on heating costs. On newer models, use the heat-off setting or the energy-saver dry option.

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- » Avoid using your dishwasher to warm plates. The extra heat will raise your energy bill.
- » A dishwasher will operate more efficiently if you unclog the drain of food particles and clean it weekly.

I Stove and Oven

You can cook delicious and nutritious meals and help lower energy costs by following these handy tips.

- » Thaw foods and cut vegetables into small pieces. They'll take less time to cook.
- » Put lids on pots and pans, and make sure they're the right size for the burners. Foods will cook faster and use less energy.
- » When the pot boils over or grease splatters, clean the reflector pans. They'll reflect more heat when they shine.
- » If the flames on your gas stove or oven are yellow, energy is being wasted and the burners need adjusting. Call an appliance repair professional.

When using your oven, follow these suggestions:

- » Preheat the oven only when the recipe calls for it. Don't preheat if you're using the broiler.
- » Use glass and ceramic dishes. They hold heat better and you can lower the oven temperature 25 degrees.
- » Your stove or oven may not always be the best choice! Small appliances, such as crockpots, electric frying pans and your microwave oven may be more energy efficient.
- » Open the oven door to peek at food inside, and you'll lose 25 degrees to 75 degrees of heat. It's best to look through the window or wait until the food is almost done before opening the door.
- » If you have a self-cleaning oven, clean it immediately after use. Because it's already hot, it will take less energy to get to the heat-cleaning stage.

Consumers Energy PIPP Program Report out to MPSC Staff

- » In the market for a new gas stove? Choose a model with electronic igniters instead of pilot lights for the highest efficiency.
- » A microwave is best for defrosting and cooking small portions; an oven is more efficient for cooking large items, such as turkeys and roasts.
- » When your electric burners are worn out and don't work properly, they use more energy. Save by replacing them.
- » Save energy by baking an extra dish or cooking entire meals in the oven at the same time.

| Clothes Washer

These helpful hints can save you money and don't cost a penny.

- » Wash and rinse your clothes in cold water instead of hot to save on water heating costs. Use a cold-water detergent.
- » Set the water level on your washer to match the size of the load and save two ways — on water and energy.
- » You'll save more by waiting to wash until you have a full load.
- » Add the right amount of detergent. Too many suds make your washer work harder and use more energy.

| Clothes Dryer

Here are more hot ideas to help you save.

- » Fill your clothes dryer, but don't overload it. Your clothes will dry faster when they have room to tumble.
- » Overdrying wears out your clothes and wastes energy. Stop your dryer when the laundry is dry by setting the timer or using the auto dry cycle.
- » Your dryer's lint trap helps warm air flow better and dries your clothes faster. Make sure to clean it after each load.

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- » Dry your laundry in consecutive loads to take advantage of a heated dryer. Your laundry will dry faster and use less energy.
- » On sunny days, hang your clothes outdoors to dry.

I Refrigerator/Freezer

Your refrigerator/freezer uses more electricity than any other appliance in your kitchen. These tips can help you use less and save more.

- » Avoid opening the refrigerator or freezer door to browse. Each time you do, cold air escapes and your energy costs increase.
- » Let hot foods cool before putting them in your refrigerator or freezer. Hot foods cause the motor to work longer and harder.
- » Leave room in front of your refrigerator/freezer to allow cold air to circulate better.
- » Because frozen food stays cold longer than air, it's good to keep your freezer full, but not packed. You'll save energy by placing water-filled containers in empty spaces.
- » Running two refrigerators increases your energy bill. Plus, older refrigerators are less efficient than new ones. To save, get rid of the second refrigerator and get \$50 with Appliance Recycling.
- » Condenser coils remove heat from inside the unit. Make sure they're at least two inches from the wall and clean them twice a year.
- » If cold air is escaping around the door seal, adjust or replace the seal. To check, close the door on a dollar bill. If it's easy to pull out, cold air is escaping.
- » If you have a manual-defrost freezer, it will work more efficiently when ice buildup is kept to 1/4 inch or less.
- » Set the refrigerator thermometer at 38 degrees to 42 degrees and your freezer at 0 degrees to 5 degrees.

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I Other Appliances

Most homes have at least 50 household items that use natural gas or electricity. Look around your home for places you can save.

- » If your water pump stays on too long after using water, have it serviced. If it runs whenever water is turned on, it will wear out faster and use more energy.
- » To save water and energy, turn off faucets, indoors and out, when you're done using them.
- » Make sure the toilet handle doesn't stick after flushing. It wastes water and makes your water pump run longer.
- » Be sure the thermostats on appliances work properly. If the thermostat sticks, the appliance stays on and raises your energy bill.
- » Turn off the humidifier or dehumidifier when they're not needed.
- » After making your coffee in the morning, turn off your coffeemaker and pour the leftover coffee into an insulated container to keep it hot.
- » Turn off the TV, DVR, DVD player, stereo or radio when no one is watching or listening.
- » If your water pipes are wrapped with insulating electric heat tape, turn it off when the weather warms up.
- » Use small appliances that plug into electrical outlets instead of rechargeable devices, such as hand-held vacuum cleaners and lawn trimmers which use more energy.
- » Unplug electronics when not in use. Computers, DVD players, televisions and other electronics, including power strips, use energy when they're plugged in — even though they're turned off.



Utilize Smart Power Strips:

Many electronic products continue to draw power from the wall even when they are powered off. Since it's not always practical to unplug these items whenever you leave your desk, "smart" power strips can effectively do so for you.

There are three types of smart power strips: timer-equipped, motion controlled occupancy sensing and electrical current sensing.

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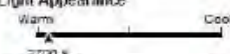
Lighting

Follow these bright ideas to save energy.

- » Choose light bulbs carefully. Light emitting diodes (LEDs) use 80 percent less energy than standard incandescent bulbs and last 15 times longer. For example, a 12-watt LED bulb is equal to a 60-watt incandescent bulb. They can also be used as porch lights.
- » Install dimmer switches and three-way bulbs. They use less energy and let you enjoy a choice of lighting levels for different tasks.
- » For outdoor use, consider LEDs, which are more efficient and last longer than their mercury vapor or high-pressure sodium counterparts.
- » When buying bulbs, check the lumens. The higher the lumens, the more light you'll get.

More energy-saving ideas

- » More light shines through when you keep dust off your lampshades, light fixtures and bulbs.
- » Because light bounces off walls and ceilings, you'll get more light for the money if you paint your walls light colors.
- » Increase the power of reflection by putting lamps in corners where two walls reflect light into the room.
- » Place security lights on a timer or photo-electric control so they'll turn on and off automatically. Mercury vapor or high-pressure sodium lights are the best energy buys for outdoors.

Lighting Facts		Per Bulb
Brightness	870 lumens	
Estimated Yearly Energy Cost	\$1.57	
	Based on 3 hrs/day, 11¢/kWh Cost depends on rates and use	
Life	5.5 years	
	Based on 3 hrs/day	
Light Appearance		
Energy Used	13 watts	
Contains Mercury		
For more on clean up and safe disposal, visit epa.gov/cfl .		

Bright Idea:
The Lighting Facts label on light bulb packages highlights brightness and yearly energy cost.

Consumers Energy PIPP Program Report out to MPSC Staff

Windows

You can stop heat from going out your windows. Take a look at these energy saving ideas.

- » Drapes can cut heat loss in half if they have an insulating liner.
- » Let your drapes hang loose, and be sure they don't block heat registers and air-return ducts.
- » Vinyl shades and quilted curtains help cut heat loss. Shutters and blinds don't work as well because air travels through their open spaces.
- » Close drapes on north-facing windows to keep the chill out in winter.
- » On cool days, let the sun shine in by opening curtains, drapes, shades, shutters and blinds on the southern and eastern windows. Close them on cloudy days and at night to keep heat from escaping.
- » On hot summer days, open windows and doors in early morning and in the evening to let cool air in.
- » Cut your heating losses by installing storm windows. Double-pane or triple-pane windows are best.
- » Replace old windows with new high-performance windows.
- » Repair open spaces in broken or cracked windows and door glass.
- » Use clear plastic or vinyl sheeting on the inside of your windows to make a temporary double-pane window. Use weatherproof tape or duct tape, trim or tacking strips to hold it in place.



Fire and Carbon Monoxide Poisoning: Please don't use gas grills, ovens or range tops for heating. These items can cause a fire or result in deadly carbon monoxide poisoning. And to be safe, be sure your house is equipped with a carbon monoxide detector.

Consumers Energy PIPP Program Report out to MPSC Staff

I Insulation

More than 50 percent of energy used for winter heating leaves homes through uninsulated walls, floors, ceilings and attics. Insulation traps small pockets of air between warm and cold areas inside your home and helps keep warm air in during winter. Insulation is the key to big energy savings. Try these tips.

- » Check your home's insulation in the attic, ceiling, walls and floor. Insulation is judged by its R-value. The higher the R-value, the better the material keeps in heat during cold weather and keeps in cool air during hot weather. Required R-values vary across Michigan. Check with a store that sells insulation or a local contractor for the requirements in your area.
- » Adding blown-in cellulose or batts of fiberglass insulation in your attic is one of the most cost-effective savings measures and something you can do yourself.
- » Add extra insulation to floors by covering them with a pad and rug.
- » Prevent heat loss as warm air travels through heat ducts from your furnace by wrapping heat ducts with insulation. Also, use duct foil tape where rectangular heat ducts join, and waterbase acrylic latex caulk where round and rectangular duct fittings meet.
- » Seal cracks where pipes, electrical wires, vents and ducts enter your home.
- » About 2 percent of air escapes your home through electrical outlets, especially on outside walls. Install insulation made for electrical outlets. You can also use safety outlet plugs to stop cold air from entering your home.
- » Insulate hot water pipes in unheated areas to keep hot water hot.

Consumers Energy PIPP Program Report out to MPSC Staff

I Caulk & Weather Stripping

You'll live more comfortably when you get rid of cracks and leaks that let warm air escape from your home on cold days. Here's how.

- » Seal cracks in your basement floor to keep heat in and cold air out.
- » Caulk windows, doors and anywhere air leaks in or out.
- » Weather-strip around windows and doors.
- » Seal cracks where pipes, electrical wires and ducts enter your home.
- » Seal openings where doors and windows close into their frames with weather stripping — pieces of felt, rubber, metal or plastic that compress when you shut them.
- » Replace torn or worn weather stripping and caulk.
- » Do not caulk around your natural gas water heater exhaust pipes or furnace exhaust pipes.

I Fireplace

Add to the warmth and enjoyment of a fireplace by following these tips.

- » Close the damper when the fireplace isn't being used. About 14 percent of air escapes your home through the fireplace chimney.
- » Try not to run the fireplace and central heating system at the same time.
- » Seal unused fireplaces to keep heat from escaping and cold air from coming in.

Consumers Energy PIPP Program Report out to MPSC Staff

I Pool and Hot Tub

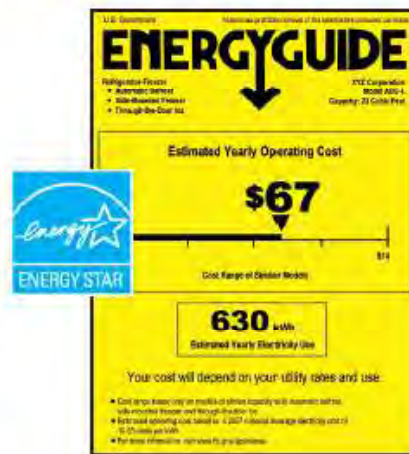
Efficient ways to heat your pool and hot tub can yield extra savings. Consider these recommendations.

- » Use a solar cover to get free heat from the sun and prevent evaporation. If too much water evaporates, the water temperature drops
- » Keep the filters clean. You'll save energy
- » Be sure the water temperature is comfortable, about 80 degrees. Overheating wastes energy
- » Cover your hot tub when it's not in use to retain heat

Shopping for New Appliances?

When shopping for new appliances, check EnergyGuide labels. They provide the annual operating cost and efficiency ratings of the appliance.

Look for ENERGY STAR® products that can save you money month after month. Buy the most energy efficient model you can to keep your energy costs down.



Save on Energy Bills

With 50 rebates for residential customers and more than 150 for businesses, there is something to help you reduce your cost with energy efficiency.

For home rebates and savings, visit ConsumersEnergy.com/myhome



Consumers Energy PIPP Program Report out to MPSC Staff

Get on the Budget Plan

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APP Agency One-Pager Summary

Metric Summary for APP One Pagers:

CARE Modified Budget:

Enrollment metrics:

- Enrollment year end targets (provided by agencies)
Defined as - Total estimated target of enrollments provided by each MEAP agency.
- Roll-over customers from previous FY enrollment in the program
Defined as - Distinct count of customers with program year greater than one.
- New customers to program
Defined as - Distinct count of customers with program year one.
- Current enrollments by program
Defined as - Distinct count of customers still enrolled by program indicator.
- Current enrollments by federal poverty level –
Defined as - Distinct count of customers by each poverty level range.
- Current enrollments by commodity
Defined as - Distinct count of customers by each commodity electric, gas or combination (both electric and gas).
- De-enrollments due to default or reaching MEAP cap
Defined as- Distinct count of customers de-enrolled for either the default flag or the MEAP cap flag respectively.
- Number of customers graduating for the current month and the next two months from the date of the report.
Defined as - Distinct count of customers with graduation dates within the applicable month for the current and next two months.

Financial metrics:

- Funding target (provided by the agencies)
Defined as - Total target (in dollars) for fiscal year spending. Provided by each MEAP agency.
- Current amount spent for the fiscal year
Defined as - sum of payments received up to the date of report for the current arrears, gap and reconciliation credits.
- End of fiscal year forecasted spend
Defined as - sum of current amount spent for the fiscal year and sum of the forecasted spending for arrears, gap and reconciliation credits.
- Difference in the projected end of fiscal year spend vs provided funding target
Defined as - Funding target minus projected end of fiscal year spend.
- Provided in the table of the report: Amounts that have been billed up to the date of the report.
 - Under the current heading - Amounts have been billed up to the date of the report.
 - Arrears – sum of all arrears payments
 - Credits – sum of all gap payments
 - Reconciliation - sum of all reconciliation payments

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- Under the future heading: Forecasted amount for each payment type past the date the report was created
 - Credits – The sum of all anticipated payments across all months in the fiscal year for all current customers based on their winter and summer credits amounts as defined in the CARE MB credit table. Each customer is also removed from this calculation on the month before their graduation date.
 - Arrears – retrieves the sum of all the bills generated for each customer for the arrears payments based on the CARE MB payment schedule and their initial arrears at enrollment up to the \$3000 forgiveness. 1st payment is made at 30 days after enrollment, then 12 months after enrollment and the third made 18 months after enrollment.
 - Reconciliation – These payments have not been added in the future forecast as the company needed more of the pilot payments to be completed before an accurate forecast could be created.
- Average Cost per customer by FPL
Defined as the sum of all payment types up to the date of the report (arrears, gap, and reconciliation) divided by the distinct count of customers enrolled over the fiscal year.

PIPP

PIPP Enrollment metrics:

- Enrollment year end targets (provided by agencies).
Defined as -Total estimated target of enrollments provided by each MEAP agency. For PIPP these are the initial targets set for the overall program
- Roll-over customers from previous FY enrollment in the program.
Defined as - Distinct count of customers with program year greater than one.
- New customers to program.
Defined as - Distinct count of customers in program year one.
- Current enrollments in program.
Defined as - Distinct count of customers still enrolled by program indicator at the time the report was created.
- Current enrollments by commodity and federal poverty level.
Defined as -Distinct count of customers by each commodity electric, gas or combination (both electric and gas) and separated by each FPL range.
- De-enrollments due to default or reaching MEAP cap.
Defined as- Distinct count of customers de-enrolled for either the default flag or the MEAP cap flag respectively.
- Number of customers graduating for the current month and the next two months from the date of the report.
Defined as - Distinct count of customers with graduation dates within the applicable month for the current and next two months.

PIPP Financial metrics:

- Average arrears at enrollment.

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Arrears at enrollment are captured in our enrollment information. The average arrears at enrollment are calculated as the sum of all the arrears at enrollment for each customer and divided by the distinct count of customers enrolled in the fiscal year.

- Average cost per customer by commodity.
The sum of all payment types up to the date of the report (arrears, gap) divided by the distinct count of customers enrolled over the fiscal year
- Current Gap credits
Sum of all payments from the monthly gap credit payment type up to the date of the report.
- Current Arrears credits –
Sum of all payments from the arrears payment type up to the date of the report.
- Future Arrears credits
Sum of all created bills for the agency payments on behalf of the customer for each of their 1/24th initial arrears payments.
- Future Gap credits.
Future gap credits are forecasted as the current enrollments for each commodity (electric, gas and combination) multiplied by the forecasted cost of each commodity by month for the fiscal year. Each customer is removed from the enrollment calculation the month before their graduation date.

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Appendix H – Community Outreach (Customer Pop-Ups)

Outreach

FY24 FOCUS Kent & Calhoun Counties

STATE-WIDE EVENTS

- Grand Rapids Senior Expo
- Tekonsha Senior Expo
- Flint City Hall
- Great Start Collaborative Family Night
- Tekonsha Senior Fair
- Warren Habitat for Humanity Celebration
- Flint City Hall Monthly Tabling
- SALT VITA Training (with DTE)
- Baxter Community Center Thanksgiving Box Giveaway
- MPSC-required outreach event at Baxter Community Center
- Genesee County Prevention Coalition Annual Meeting
- Cook Library Center Holiday Event
- Communities First Resource Fair
- Albion Health and Safety Fair
- Healthy Babies Day
- Social Determinants of Health In-Person Meetup
- Kentwood Spotlight on Seniors Expo
- Calhoun County Veterans Stand Down
- Grand Rapids Senior Expo (x2)
- Calhoun County Senior Expo
- MCAH Breakfast of Champions
- Warren Proactive Outreach Event
- Muskegon Proactive Outreach Event

AGENCY TOUCH-POINTS

- South County Community Services
- TSA Kalamazoo
- Senior Neighbors (two formal trainings, multiple touchpoints)
- Great Start Collaborative (one presentation, two touchpoints)
- Flint Community Health Workers (monthly touchpoints, one presentation)
- Albion Healthcare Alliance (multiple touchpoints)
- Calhoun County Senior Milage (two trainings, one presentation, multiple touchpoints) Guardian Financial (training)
- CEDAM Tax Outreach and Advocacy Group (monthly, multiple orgs)
- Genesee County Continuum of Care
- Baxter Community Center (one training, multiple touchpoints)
- SECOM Grand Rapids
- West Michigan Works (trainings and touchpoints)
- Kent County ZIT
- Essential Needs Task Force (monthly touchpoint)
- North Kent Connect (touchpoints and tabling)
- Accounting Aid Society (multiple trainings, touchpoints, and event collaborations)
- UWSCM VITA (marketing collab)
- United Way of Genesee County
- Flat River Outreach Ministries
- Creston Plaza Neighborhood
- Albion Healthcare Alliance
- Roscommon United Way
- Neighborhoods Inc
- Community Action Agency of Lenawee, Jackson, Hillsdale Counties (marketing collab)
- Manchester Community Resource Center
- Fors Senior Center

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Appendix I – Internal Resources

Inability to Pay Process



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Goals and Success

Program Name	Program Goal	Known Program Success
State Emergency Relief (SER)	A one-time payment to help customers get out of immediate crisis.	FY23 60.83% FY22 62.91% of customers accepted into program by DHHS. This is for all utility partners across MI.
Home Heating Credit (HHC)	Intended to help qualified low-income families offset the costs of their residential heating expenses.	Tax Year 2022/Processing 2023 approximately 244,500 claimants received the credit and there were 9,600 denials. Almost all the denials are for either income exceeding the ceiling or for a filing after the September 30 deadline. Tax Year 2023/Processing 2024 approximately 235,500 claimants received the credit and there were 11,880 denials. The jump in denials for 2024 processing was driven by an increase in the number of denials for prior year claims filed after September 30, 2023. In a typical year, more than 95% of all the credit claims Treasury receives results in credits being issued. The error rate is pretty low. This information is for all utility partners across MI.
Michigan Energy Assistance Program One-Time Assist (MEAP OTA)	This is a one-time payment and is not intended for ongoing or chronic financial difficulties. It allows customers exposure to other MEAP programs like self-sufficiency services and CARE.	N/A
Michigan Energy Assistance Program – Consumers Energy Resource for Energy (MEAP CARE)	Incentivize customers to develop strong behavior patterns and prioritize paying their energy bill, staying conscious of their energy consumption.	>85% graduation rate
Percent of Income Pilot Plan (PIPP)	Incentivize customers to develop strong behavior patterns and prioritize paying their energy bill, staying conscious of their energy consumption.	66% graduation rate
Residential Income Credit (RIA)	This credit provides additional payments on the customer bill to help lessen the customer burden.	N/A
Low Income Assistance Credit (LIAC)	This credit provides additional payments on the customer bill to help lessen the customer burden.	N/A
Green Giving (GG)	This credit provides additional payments on the customer bill to help lessen the customer burden.	N/A

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LMI Customer Personas

Jack Turbulent

Will eventually pay, currently feels stretched thin and exploring the option of not paying

Bill Range: \$75 - \$150
Income: \$20,500 / yr
Household Size: 1

7% of Customers

“ I mentally divide up my paycheck before it’s even deposited.”

Jack’s Story

When Jack describes his finances, he refers to consistent ups and downs. He lives paycheck to paycheck and almost always has at least one bill past due. Jack will spend his paycheck within the first two days of receiving it due to perpetually being behind.

Jack works at least two jobs at any given time, each with inconsistent hours, making long term financial planning difficult. He finds his utility bills to be unpredictable, and unnecessarily complicated. Rather than spending time figuring out the best ways to lower his bills, he prioritizes finding ways to bring in additional income and cut day to day expenses with near-term gains.

Shut-off Timeline

Trusted Resources

- United Way of Southeast Michigan
- Still Point Zen Buddhist Temple

Barriers to participating in offerings

- Paying the entire monthly bill at once
- Isn’t positioned to consider long-term investments
- Time is money

Motivators for paying on time

- Payday
- Environmental causes

Feelings towards utility provider

- Anxious
- Confused
- Annoyed
- Frustrated

The Olivers On-The-Edge

Deprioritizing utility bills, unsure what to do next. Trying to prevent the situation from worsening and unaware of resources to turn to.

Bill Range: \$175 - \$205
Income: \$75,000 / yr
Household Size: 4

18% of Customers

“ We are considering looking to friends and family for help, but it’s embarrassing and uncomfortable.”

The Olivers’ Story

The Olivers had once scoffed at the idea of needing financial support, they’ve always worked hard and lived within their means. Now that one of the primary earners of the household has been unexpectedly laid off, they are overwhelmed and making uncomfortable sacrifices. Bills are beginning to pile up and simply reprioritizing isn’t enough to make ends meet.

With one sole earner who works from home, having electricity and a comfortable work environment is a top priority. Feeling incapable of cutting back on other necessities, they are worried about the consequences of paying late and don’t know where to turn.

Shut-off Timeline

Trusted Resources

- West Michigan multi-racial alliance
- Friends and family

Barriers to participating in offerings

- Earning too much to qualify for energy assistance
- Lack of knowledge of options
- Busy lifestyle

Motivators for paying on time

- Avoiding embarrassment
- Fear of the consequences

Feelings towards utility provider

- Necessary / dependent
- Unhelpful

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Arthur Anywhere Else

Distressed but willing to pay, hopeful that tomorrow will bring new opportunities

Bill Range: \$150 - \$225
Income: \$32,750 / yr
Household Size: 2

16% of Customers

“ Why would I ask for help when it's not my fault? It's the system that needs to change.”

Arthur's Story

Arthur is a happily married retiree and grandfather. He has always done things by the book, living by the values instilled in him as a child. Now, living on a fixed income, Arthur feels he is losing independence, as if he is at the mercy of outside forces and unable to live a lifestyle he has earned. Sometimes, he finds it best to just ignore bills as a way to send a message.

Arthur longs for simpler times. He is disappointed that he isn't able to provide for his family and give them similar experiences he remembers having in his younger years. Arthur wants to focus on spending time with his loved ones and not stressing over bills and making ends meet.

Shut-off Timeline

Trusted Resources

- Local Church
- Northern Michigan Senior Center
- Evening News

Barriers to participating in offerings

- Pride
- Making a point / sending a message
- Complexity of programs

Motivators for paying on time

- Setting a good example to his family
- Maintaining independence
- Time with family

Feelings towards utility provider

- Distrust
- Anger
- Us vs them

Bev Bottomed Out

Tired and giving up, is unable to pay and has exhausted all options

Bill Range: \$150 - \$175
Income: \$23,750 / yr
Household Size: 3

21% of Customers

“ I've done everything I can and used all my resources. I'm worried about being evicted and worse, losing my children.”

Bev's Story

Bev is a single parent working an hourly job at the hospital. Bills have been piling up – Prioritizing food, rent, car expenses, and her phone bill as left her unable to make payments on her electric bill. Her past due balance is too high to comprehend, so she decides to trust that the utility company wouldn't shut off power to a family with children.

With restricted access to her mobile device during working hours, and very limited time for breaks, she hasn't been able to do research or contact any resources that could help her. She worries for the safety of her children and keeping her family together, and questions if it's worth taking time off to sort things through.

Shut-off Timeline

Trusted Resources

- School Parents Group
- Colleagues

Barriers to participating in offerings

- Prioritizing bigger problems
- Time to research
- Inflexible operating hours

Motivators for paying on time

- Children's safety and well being

Feelings towards utility provider

- Not the biggest problem
- Understanding

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Appendix J – Figures

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Appendix K – DATA
PIPP

Timeframe used for the below data (e.g. Oct 2022 - Jan 2025): Pre-Plan: Oct 2021 (FY22) - Jan 2023 (FY23); Plan: Oct 2022 (FY23) - Jan 2025 (FY25)									
Enrollment Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
Number of households enrolled in the pilot	179	130	22	124	86	7	63	94	11
Number of households who completed 12 months of the pilot	143	101	15	103	74	6	58	65	8
Number of households who completed 24 months of the pilot	129	80	9	90	55	4	49	53	6
Household Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
Average Monthly Income	707	707	707	1490	1490	1490	1997	1997	1997
Average Household Size	2	2	2	2	2	2	4	4	4
Average arrears at enrollment	451	305	200	314	226	140	200	194	75
Average arrears at 12 months (households who completed a full 12 months)	163	108	86	167	112	46	86	91	23
Average arrears at program completion (households who completed a full 24 months)	45	10	22	66	5	1	16	3	0
Consumption and Energy Burden Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
12 month average monthly consumption before enrollment (kWh/mc)	863/8.0	1005	9.1	871/8.3	963	8.4	874/8.2	983	8.5
Average monthly consumption for months 1-12 after enrollment (households who completed a full 12 months)	971/9.1	1218	11.3	865/8.3	1110	11.8	1102/10.3	1043	9.9
Average monthly consumption for months 13-24 after enrollment (households who completed a full 24 months)	861/8.3	1211	10.4	866.8.4	1050	12	857/7.9	968	9.9
Average Energy Burden (%) during enrollment (before assistance applied)	0.39	0.5	0.18	0.18	0.13	0.09	0.15	0.09	0.06
Average Energy Burden (%) during active enrollment (full with assistance applied)	0.13	0.06	0.03	0.08	0.03	0.03	0.07	0.03	0.03
Payment and Default Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
Average monthly total bill (before assistance applied) during active enrollment	277	210	128	268	186	137	301	173	113
Average monthly credited amount (bill subsidy) during active enrollment	171	160	103	155	139	96	174	112	60
Average monthly bill payment due from customer during active enrollment	80	32	25	87	47	41	115	61	33
Average monthly payment actually paid by customer during active enrollment	61	30	27	89	47	40	116	60	55
Average monthly payment due from customer 12 months pre program	256	191	95	257	183	96	257	187	87
Average monthly payment actually paid by customer 12 months pre program	221	193	102	245	190	98	251	188	98
Percentage of on time payments 12 months before enrollment	59	57	58	62	65	51	68	70	71
Percentage of on time payments for months 1-12 after enrollment	66	64	63	67	62	54	69	70	79
Percentage of on time payments for months 13-24 after enrollment	68	70	72	67	70	61	69	72	75
Number of households who defaulted for non-payment	30	30	9	23	21	2	13	28	3
Number of households who defaulted due to failure to reverify for year 2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Number of households who defaulted for any other reason (cite reasons in report narrative)	23	21	4	11	12	1	7	13	2
Number of households that received a service disconnection/shutoff notice within 12 months of default	7	6	4	5	4	1	2	5	2
Number of households whose service was disconnected within 12 months of default	5	5	2	4	4	0	2	4	1
Assistance Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
Number of households receiving SER during active enrollment	24	15	1	15	11	0	9	12	0
Number of households receiving HHC during active enrollment	68	8	6	43	3	1	18	3	2
Number of households receiving MEAP/agency payment during active enrollment	19	12	2	10	2	0	3	11	1
Number of households receiving LIA during active enrollment	157	92	18	110	63	8	62	75	10
Number of households receiving RIA during active enrollment	177	123	22	124	86	7	68	92	10
Vulnerable Household Member Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
Number of enrolled households with a senior	14	13	0	14	11	1	10	12	1
Number of enrolled households with a disabled member	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Number of enrolled households with a young child (under 6)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Energy Waste Reduction Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
Number of actively enrolled households referred for EWR services	179	130	22	124	86	7	69	94	11
Number of actively enrolled households that received EWR services	44	36	10	40	26	4	20	27	7

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CARE

Timeframe used for the below data (e.g. Oct 2022 - Jan 2025): Pre-Plan: Oct 2021 (FY22) - Jan 2023 (FY23); Plan: Oct 2022 (FY23) - Jan 2025 (FY25)									
Enrollment Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
Number of households enrolled in a regular Affordable Payment Plan (traditional CARE or LSP)	3077	2250	935	2473	1673	657	1477	1115	459
Number of households who completed 12 months of a regular Affordable Payment Plan	2245	1513	605	1936	1193	485	1172	819	339
Number of households who completed 24 months of a regular Affordable Payment Plan	1324	868	310	1282	755	296	802	549	210
Household Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
Average Monthly Income	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Average Household Size	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Average arrears at enrollment	274	253	172	270	203	85	146	175	50
Average arrears at 12 months (households who completed a full 12 months)	137	134	89	149	106	50	80	100	28
Average arrears at program completion (households who completed a full 24 months)	102	15	34	63	67	17	26	27	2
Consumption and Energy Burden Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
12 month average monthly consumption before enrollment (kWh/mcf)	892/8.5	1126	9.1	870/8.5	1042	9	887/8.5	1126	8.6
Average monthly consumption for months 1-12 after enrollment (households who completed a full 12 months)	894/8.5	1175	8.2	860/8.4	1112	8.2	870/8.5	1152	8.1
Average monthly consumption for months 13-24 after enrollment (households who completed a full 24 months)	841/8.0	1114	8.5	788/7.9	1055	8.4	811/8.0	1068	8.2
Average Energy Burden (%) during enrollment (before assistance applied)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Average Energy Burden (%) during active enrollment (bill with assistance applied)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Payment and Default Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
Average monthly total bill (before assistance applied) during active enrollment	262	199	95	254	179	94	257	193	91
Average monthly credited amount (bill subsidy) during active enrollment	125	93	45	117	88	40	108	79	30
Average monthly bill payment due from customer during active enrollment	75	78	50	93	75	54	104	90	61
Average monthly payment actually paid by customer during active enrollment	80	93	47	102	81	58	106	84	60
Average monthly payment due from customer 12 months pre program	263	193	95	245	172	94	257	193	91
Average monthly payment actually paid by customer 12 months pre program	257	190	98	247	170	95	260	195	90
Percentage of on time payments 12 months before enrollment	55	50	72	75	63	61	60	69	60
Percentage of on time payments for months 1-12 after enrollment	57	53	70	75	62	62	65	70	59
Percentage of on time payments for months 13-24 after enrollment	50	60	71	70	64	62	60	70	61
Number of households who defaulted for non-payment	555	526	161	388	366	90	246	242	68
Number of households who defaulted due to failure to re-enroll for year 2									
Number of households who defaulted for any other reason (cite reasons in report narrative)	415	314	129	280	237	99	189	130	96
Number of households that received a service disconnection/shutoff notice within 12 months of default	101	105	34	54	48	16	47	34	11
Number of households whose service was disconnected within 12 months of default	90	98	31	52	41	15	45	31	10
Assistance Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
Number of households receiving SER during active enrollment	337	215	137	222	150	82	152	92	70
Number of households receiving HIC during active enrollment	715	96	179	555	62	116	247	35	60
Number of households receiving HEAP/agency payment during active enrollment	255	159	113	175	141	71	106	87	74
Number of households receiving LIA during active enrollment	2062	1016	619	1736	833	470	1104	560	345
Number of households receiving RIA during active enrollment	2924	1999	806	2351	1461	538	1380	968	366
Vulnerable Household Member Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
Number of enrolled households with a senior									
Number of enrolled households with a disabled member									
Number of enrolled households with a young child (under 6)									
Energy Waste Reduction Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
Number of actively enrolled households referred for EWR services	3077	2250	935	2473	1673	657	1477	1115	459
Number of actively enrolled households that received EWR services	886	175	82	520	300	27	155	277	26

Consumers Energy PIPP Program Report out to MPSC Staff

CARE MB

Timeframe used for the below data (e.g. Oct 2022 - Jan 2025): Pre-Plan: Oct 2022 - Sept 2023; Plan Oct 2023 (FY24) - Jan 2025 (FY25) (Only for enrollments from FY24)									
Enrollment Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
Number of households enrolled in the soft launch of the Modified Budget Affordable Payment Plan	313	216	60	187	118	20	66	54	25
Number of households who completed 12 months of the soft launch of the Modified Budget Affordable Payment Plan	297	127	39	123	72	12	44	32	6
Number of households who completed 24 months of the soft launch of the Modified Budget Affordable Payment Plan									
Household Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
Average Monthly Income	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Average Household Size	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Average arrears at enrollment	\$ 427	\$ 395	\$ 327	\$ 478	\$ 374	\$ 177	\$ 330	\$ 436	\$ 327
Average arrears at 12 months enrollment (households who completed a full 12 months)	\$ -	\$ 14	\$ -	\$ -	\$ 29	\$ -	\$ 8	\$ 39	\$ 25
Average arrears at program completion (households who completed a full 24 months)									
Consumption and Energy Burden Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
12 month average monthly consumption before enrollment (kWh/mcf)	910/7.5	1115	6.8	897/7.8	1163	6.8	889/6.5	1184	6.6
Average monthly consumption for months 1-12 after enrollment (households who completed a full 12 months)	881/8.3	1010	8.4	886/8.4	1056	10.3	857/7.9	1035	9.9
Average monthly consumption for months 13-24 after enrollment (households who completed a full 24 months)									
Average Energy Burden (%) during enrollment (before assistance applied)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Average Energy Burden (%) during active enrollment (bill with assistance applied)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Payment and Default Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
Average monthly total bill (before assistance applied) during active enrollment	234	186	92	237	196	102	228	289	109
Average monthly credit bill amount (bill subsidy) during active enrollment	139	78	46	100	46	33	64	44	25
Average monthly bill payment due from customer during active enrollment	131	123	40	154	142	55	157	159	62
Average monthly payment actually paid by customer during active enrollment	135	121	45	155	142	56	158	167	66
Average monthly payment due from customer 12 months pre program	241	195	94	244	206	111	221	209	96
Average monthly payment actually paid by customer 12 months pre program	243	200	92	248	207	107	226	209	95
Percentage of on time payments 12 months before enrollment	57	58	60	62	55	63	59	54	61
Percentage of on time payments for months 1-12 after enrollment	60	61	63	65	56	64	60	57	66
Percentage of on time payments for months 13-24 after enrollment									
Number of households who defaulted for non-payment	72	58	15	37	31	6	19	13	10
Number of households who defaulted due to failure to reverify for year 2									
Number of households who defaulted for any other reason (see reasons in report narrative)	53	37	8	24	22	2	5	15	8
Number of households that received a service disconnection notice within 12 months of default									
Number of households whose service was disconnected within 12 months of default									
Assistance Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
Number of households receiving SER during active enrollment	70	33	18	41	22	6	13	9	10
Number of households receiving HHC during active enrollment	100	10	14	45	7	2	15	0	3
Number of households receiving HEAP/agency payment during active enrollment	21	17	2	9	10	3	6	7	2
Number of households receiving LI during active enrollment	155	54	33	98	16	8	43	6	9
Number of households receiving BR during active enrollment	312	216	60	187	118	20	66	54	25
Vulnerable Household Member Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
Number of enrolled households with a senior	24	22	1	16	14	2	8	11	2
Number of enrolled households with a disabled member	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Number of enrolled households with a young child (under 6)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Energy Waste Reduction Data	20-75%			76-110%			111-150%		
	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only	Combo	Electric Only	Gas Only
Number of actively enrolled households referred for EWR services	313	216	60	187	118	20	66	54	25
Number of actively enrolled households that received EWR services	28	20	5	17	11	2	6	5	2

Consumers Energy PIPP Program Report out to MPSC Staff

Average Low-Income Data

	Pre- Plan: Oct 2021 (FY22) - Sept 2022 (FY22) Plan : Oct 2022 (FY23) - Sept 2024 (FY24)		
	State the timeframe used for the below data (e.g. Oct 2022 - Jan 2025)		
Enrollment Data	Combo	Electric Only	Gas Only
Number of households (average monthly during pilot period)	13303	10940	15093
Household Data	Combo	Electric Only	Gas Only
Average arrears at the start of PIPP	\$ 353	\$ 195	\$ 127
Average arrears at 12 months	\$ 283	\$ 167	\$ 117
Average arrears at program completion	\$ 249	\$ 160	\$ 101
Consumption and Energy Burden Data	Combo	Electric Only	Gas Only
12 month average monthly consumption prior to pilot start date (kWh/mcf)	705/6.9	782	7.1
Average monthly consumption for months 1-12 after pilot start date	657/6.6	728	6.8
Average monthly consumption for months 13-24 after pilot start date	648/6.2	715	6.5
Payment and Default Data	Combo	Electric Only	Gas Only
Average monthly total bill (before any assistance applied)	\$ 210	\$ 142	\$ 83
Average monthly bill payment due from customer during pilot period	\$ 187	\$ 133	\$ 69
Average monthly assistance amount (from any energy assistance program - lines 36-40) during pilot period	\$ 464	\$ 396	\$ 274
Average monthly payment actually paid by customer during pilot period	\$ 184	\$ 128	\$ 73
Average monthly payment due from customer 12 months pre pilot start date	\$ 191	\$ 138	\$ 70
Average monthly payment actually paid by customer 12 months pre pilot start date	\$ 189	\$ 134	\$ 71
Percentage of on time payments 12 months prior to pilot start date	51%	40%	67%
Percentage of on time payments for months 1-12 after pilot start date	48%	36%	61%
Percentage of on time payments for months 13-24 after pilot start date	55%	42%	68%
Number of households that received a service disconnection/shutoff notice within 12 months of pilot start date	31663	29220	20790
Number of households whose service was disconnected within 12 months of pilot start date	7946	7919	3305
Assistance Data	Combo	Electric Only	Gas Only
Number of households receiving SER during the pilot period	30157	32693	18750
Number of households receiving HHC during the pilot period	31781	8765	44636
Number of households receiving MEAP/agency payment during the pilot period	7056	6888	2259
Number of households receiving LIA during the pilot period	14028	3018	6789
Number of households receiving RIA during the pilot period	76178	63163	80949
Vulnerable Household Member Data	Combo	Electric Only	Gas Only
Number of households with a senior	2096	1478	3131
Number of households with a disabled member	N/A	N/A	N/A
Number of households with a young child (under 6)	N/A	N/A	N/A
Energy Waste Reduction Data	Combo	Electric Only	Gas Only
Number of households referred for EWR services	N/A	N/A	N/A
Number of households that received EWR services	16564	10709	36759

Consumers Energy PIPP Program Report out to MPSC Staff

Average Non-Low-Income Data

	Pre- Plan: Oct 2021 (FY22) - Sept 2022 (FY22) Plan : Oct 2022 (FY23) - Sept 2024 (FY24) <=150%		
State the timeframe used for the below data (e.g. Oct 2022 - Jan 2025)			
State the FPL used to define Low-Income			
Enrollment Data	Combo	Electric Only	Gas Only
Number of households	567957	1075626	1095646
Household Data	Combo	Electric Only	Gas Only
Average arrear at the start of PIPP	\$ 429	\$ 298	\$ 134
Average arrear at 12 months	\$ 379	\$ 269	\$ 153
Average arrear at program completion	\$ 338	\$ 269	\$ 133
Consumption and Energy Burden Data	Combo	Electric Only	Gas Only
12 month average monthly consumption prior to pilot start date (kWh/mcf)	682/7.1	656	8.2
Average monthly consumption for months 1-12 after pilot start date	633/6.5	623	7.7
Average monthly consumption for months 13-24 after pilot start date	632/5.9	610	7.0
Payment and Default Data	Combo	Electric Only	Gas Only
Average monthly total bill (before any assistance applied)	\$ 203	\$ 122	\$ 90
Average monthly bill payment due from customer during pilot period	\$ 203	\$ 122	\$ 90
Average monthly payment actually paid by customer during pilot period	\$ 207	\$ 123	\$ 93
Average monthly payment due from customer 12 months pre pilot start date	\$ 208	\$ 124	\$ 91
Average monthly payment actually paid by customer 12 months pre pilot start date	\$ 210	\$ 125	\$ 93
Percentage of on time payments 12 months prior to pilot start date	81%	83%	84%
Percentage of on time payments for months 1-12 after pilot start date	81%	84%	84%
Percentage of on time payments for months 13-24 after pilot start date	81%	83%	83%
Number of households that received a service disconnection/shutoff notice within 12 months of pilot start date	135597	159528	128419
Number of households whose service was disconnected within 12 months of pilot start date	17265	23180	14554
Assistance Data	Combo	Electric Only	Gas Only
Vulnerable Household Member Data	Combo	Electric Only	Gas Only
Number of households with a senior	183870	345263	328071
Number of households with a disabled member	N/A	N/A	N/A
Number of households with a young child (under 6)	N/A	N/A	N/A
Energy Waste Reduction Data	Combo	Electric Only	Gas Only
Number of households referred for EWR services	N/A	N/A	N/A
Number of households that received EWR services	129828	275865	568838

Consumers Energy PIPP Program Report out to MPSC Staff

PIPP Survey Raw Data

The image shows a large, dense table of raw data from a PIPP survey. The table is oriented vertically on the page. It contains multiple columns of text and numbers, with some sections appearing to be headers or sub-sections. The data is too small to read clearly but appears to be a structured list of responses or metrics.

U21870-UCC-CE-0239

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Question:

7. Refer to Direct Testimony of Jessica R. Byrom at Pages 37 - 39 in which the witness discusses the Company's LIA credit.

a. Witness Byrom states that "[t]he Company is also proposing an increase in the LIA credit, from \$30 to \$42 per meter for 2026, with an annual scaled increase through 2029."¹³ Witness Byrom also provides the following chart for "a detailed explanation of the funding increase"¹⁴:

Customer Count	LIAC CreditPer Month	Number of Months	Annual Cost	Cost Difference from Previous Year
4200	30	12	\$ 1,512,000.00	\$ -
5200	40	12	\$ 2,496,000.00	\$ 984,000.00
6200	45	12	\$ 3,348,000.00	\$ 852,000.00
7200	50	12	\$ 4,320,000.00	\$ 972,000.00
8200	55	12	\$ 5,412,000.00	\$ 1,092,000.00

i. Please label each row with its corresponding year in a separate column.

ii. Is the \$40 LIAC Credit represented in the chart different from the \$42 per meter increase discussed by witness Byrom on Page 37?

iii. Is "LIAC CreditPer Month" synonymous with "LIA credit per meter"? If "LIAC CreditPer Month" is not synonymous with "LIA credit per meter," please define each term separately.

b. Witness Byrom states that "[t]he Company is also requesting the number of customers receiving the credit in 2026 be increased to 6,200."¹⁵ Witness Byrom also states that "[t]he total costs for the test year would be \$2,788,632 Calculated from: (5,533 customers @\$42 each)*12Months."¹⁶ Witness Byrom also provides a chart for "a detailed explanation of the funding increase," which seems to indicate that the number of customers receiving the LIA credit in 2026 will be 5,200.¹⁷

i. Please explain what each of these numbers (6,200, 5,533, and 5,200) are referring to.

ii. How many customers is the Company proposing will receive the LIA credit in 2026?

iii. What is the Company proposing will be the cap for the number of customers receiving the LIA credit in 2026?

c. Please explain in detail how the Company determined the value of the scheduled increases in the LIA credit for the next five years.

d. How many customers in the Company's service territory meet the eligibility criteria for the LIA credit?

e. Please explain in detail how the Company determined the quantity of Consumers' customers who may receive the LIA credit.

Response:

i. Please label each row with its corresponding year in a separate column.

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Page 2 of 2

Year	Elec Customer Count	LIAC Credit Per Month	Number of Months	Annual Cost	Cost Difference from Previous Year
2025	4200	30	12	\$1,512.000	-
2026	5200	40	12	\$2,496.000	\$984,000
2027	6200	45	12	\$3,348.000	\$852,000
2028	7200	50	12	\$4,320.000	\$972,000
2029	8200	55	12	\$5,412.000	\$1,092,000

ii. The correct amount requested for the test year (2026) is actually \$40, not \$42.

iii. Yes, LIAC Credit Per Month is Synonymous with LIAC Credit Per Meter”.

b. i. The total number of electric customers receiving the credit in the current year of 2025 is 4200. The test year will increase by 1,000 as MEAP funding is increased each year. This will align with the MEAP reform changes in Public Acts 168,169,170, and 198 which increase the MEAP non-by passable funding factor annually. The Company forecasts an increase in 1,000 new MEAP electric customers served annually as result of the increased funding factor. Each customer on MEAP received a LIAC credit to help offset agency program costs to ensure more widespread fund availability.

ii. No more than 5200 customers

iii. 5200 customers. If MEAP customer counts do not meet the 5200 cap, credits will be applied to eligible critical care accounts not enrolled in MEAP.

c. The Company forecasts an increase in 1,000 new MEAP customers served annually due to the increased funding factor as further discussed in b (i.).

d. Based on eligibility criteria discussed in the testimony, roughly 135K residential customers are eligible. Based on collaborative MPSC workgroup and peer-to-peer utility alignment, the LIA credit is prioritized to serve customers enrolled in the MEAP funded CARE program in order to offset agency costs.

e. The Company evaluated the average share of statewide MEAP funding that Consumers Energy collects. That average was forecasted through 2029 to determine an annual expected increase in funding received. Based on the expected increase in funding annually, the forecasted program costs were utilized to determine how many electric customers could be served. The annual increase each year in expected new customers was rounded to an increase of 1,000 each year.

Witness: Jessica R. Byrom

Date: August 21, 2025

U21870-UCC-CE-0376

Page 1 of 4

Question:

12. Refer to the Company's response to UCC's First Discovery Request, U21870-UCC-CE-0237, from pages 2–9 in which Witness Jessica R. Byrom discusses the Company's plans for the LMI Customer Support Enhancement project.

a. On page 2, Witness Byrom states, "[T]he Company is focused on strengthening its data analytics capabilities, improving digital workflows, and expanding outreach mechanisms."¹⁰ Will the Company improve "digital workflows" on the customer-facing end, for Company employees, or both?

b. On page 3, Witness Byrom discusses the planned "Notification Preference Center" feature. Will there be a default method of delivery in a customer's Notification Preference Center? If yes, what will be the default method of delivery in a customer's Notification Preference Center?

c. On page 3, Witness Byrom states, "Communications will be timed around highbill seasons . . . and major life events . . . to maximize relevance."¹¹

i. Please list any and all life events the Company considers to be "major life events."

ii. Please describe in detail how the Company has knowledge of and determines when a customer is experiencing a "major life event."

d. On pages 4–5, Witness Byrom discusses planned "Community Partnerships" with "a diverse set of community organizations."¹²

i. Please list the name of each community organization with which the Company currently plans to collaborate. If the Company has not made plans with specific organizations, please provide a list of similar organizations that the Company has partnered with in the past.

ii. Does the Company have any plans to partner with environmental coalitions or collectives within the community?

e. On page 4, Witness Byrom explains that "Health and Human Service Agencies" involves "[c]oordinating with Medicaid and SNAP outreach efforts to identify and support eligible customers." Please see the Citizens Research Council of Michigan's June 25, 2025 report, "Federal Medicaid Cuts Will Have Big Consequences in Michigan," which estimates that more than 200,000 Michiganders could lose Medicaid coverage.¹³

i. Has the Company conducted any analysis about how Medicaid cuts could affect the Company's ability to "identify and support eligible customers"? If yes, please describe in detail and provide any documentation resulting from those analyses. If no, does the Company plan to conduct any analysis about how these recent Medicaid cuts could affect the Company's ability to "identify and support eligible customers"?

f. On page 4, Witness Byrom states, "The comprehensive support system consolidates access to a wide range of existing offerings into a single, streamlined enrollment experience for LMI customers."¹⁴

i. Please provide a detailed timeline of when the Company will finalize this "comprehensive support system" and deploy it for customer use.

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ii. Will the Company's CARE MB program be a part of the "wide range of existing offerings" to be consolidated in the "comprehensive support system"? If yes, please clarify which "key program category" the CARE MB program is a part of.

g. On page 4, Witness Byrom responds, "The [comprehensive support system] is designed to simplify the customer journey, reduce barriers to participation, and deliver personalized support."¹⁵ Do the Company's initiatives to "reduce barriers to participation" include language translation services? If yes, please list all the language options and the corresponding information that can be translated into those languages.

Response:

a. The Company is planning to improve digital workflows on both the customer-facing end and for internal operations. These enhancements are designed to streamline service delivery, enable earlier identification of at-risk customers, and support more personalized engagement across channels.

b. As part of the planned Notification Preference Center, the Company anticipates establishing a default communication method—likely email or SMS—while enabling customers to customize how and when they receive messages to better align with their preferences.

c.

i. As part of the LMI Customer Support Enhancement Project, the Company is considering a range of major life events that may impact a customer's ability to manage energy costs. These include job loss or reduction in income, divorce or separation, loss of a spouse or household member, relocation or housing instability, health-related challenges, retirement, birth or adoption of a child, and changes in public benefits such as Medicaid or SNAP.

ii. The Company recognizes that these events can significantly affect household financial stability and energy affordability. While it does not currently track personal life events directly, the Company is exploring how it might access or infer this type of information in the future to better support customers during times of change.

In the interim, the Company plans to use behavioral indicators—such as missed or partial payments, de-enrollment from autopay, payment plan defaults, and other billing-related patterns—to proactively identify customers who may be experiencing financial stress and offer timely, personalized support.

d.

i. U21870-UCC-CE-0237 includes a list of partners with whom the Company has plans to collaborate. Those include:

- **Michigan 2-1-1:** Providing direct links and click-to-call options to connect customers with state and local assistance resources.
- **Local Nonprofits and Human Service Agencies:** Partnering with organizations that serve low- and moderate-income households to co-host events, distribute materials, and assist with enrollment.

- Faith-Based Organizations and Community Centers: Leveraging trusted community hubs to share information and offer in-person support.
- Food Banks and Housing Assistance Providers: Integrating energy assistance messaging into broader support services.
- Educational Institutions and Workforce Development Programs: Reaching moderate-income customers through job training and adult education networks.
- Health and Human Service Agencies: Coordinating with Medicaid and SNAP outreach efforts to identify and support eligible customers.

Additional identified partners include:

- **MEAP agencies**
- **VITA sites**
- **WellWise Services Area Agency on Aging**

Partners in **bold** represent organizations the Company has partnered with in the past. These partnerships are designed to help connect customers to available resources, increase awareness of energy assistance programs, and support enrollment through trusted, community-based channels.

ii. While not currently formalized, the Company is open to exploring partnerships with environmental coalitions where such collaboration supports clean energy goals and benefits LMI communities.

e.

i. The Company has not yet conducted a formal analysis on the impact of Medicaid cuts but recognizes the potential implications and may consider future analysis to ensure outreach strategies remain effective in identifying and supporting eligible customers.

f.

i. The Company launched the initial component of the comprehensive support system known as the Simplified Enrollment Experience or My Personalized Offerings in December 2024. This digital experience allows customers to access and enroll in relevant programs through a streamlined, account-based interface.

Building on this foundation, the Company currently has plans to expand the system throughout 2025 and 2026.

ii. The Company would like to include the CARE MB program within the comprehensive support system to streamline access for eligible customers. However, because the Company does not currently own the enrollment experience for CARE MB, integration requires additional design and coordination efforts. The program is aligned with the Energy Assistance category, and the Company will continue to explore options for inclusion as part of its broader system enhancements planned for 2026.



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g. The Company understands the importance of language accessibility in reducing barriers to participation and is actively exploring how translation services can be incorporated into the comprehensive support system. This functionality remains under evaluation as part of future enhancements.

Witness: Jessica R. Byrom

Date: September 15, 2025

 An official website of the United States government
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We're doing maintenance. If you set up security codes, you can log in later, or contact the [Marketplace Call Center](#) if you need help now. 

Federal poverty level (FPL)

A measure of income updated yearly by the Department of Health and Human Services (HHS) that's used to determine eligibility for certain programs and benefits, like Marketplace [savings](#), and Medicaid and the Children's Health Insurance Program (CHIP) coverage.

These 2025 FPL income numbers are used to check if you're eligible for Medicaid and CHIP. Income amounts from the previous year are used to calculate Marketplace savings for the next year.

Federal poverty level (FPL)

Family size	2024 income numbers	2025 income numbers
For individuals	\$15,060	\$15,650
For a family of 2	\$20,440	\$21,150
For a family of 3	\$25,820	\$26,650
For a family of 4	\$31,200	\$32,150
For a family of 5	\$36,580	\$37,650
For a family of 6	\$41,960	\$43,150
For a family of 7	\$47,340	\$48,650
For a family of 8	\$52,720	\$54,150
For a family of 9+	Add \$5,380 for each extra person	Add \$5,500 for each extra person

FPL amounts are higher in Alaska and Hawaii. [Get all HHS poverty guidelines for 2025.](#)

How FPL amounts determine eligibility for reduced-cost health coverage

- **Income above 400% FPL:** If your income is above 400% FPL, you may qualify for the premium tax credit that lowers your monthly premium for a Marketplace plan.
- **Income between 100% and 400% FPL:** If your income is in this range, in all states you qualify for the premium tax credit that lowers your monthly premium for a Marketplace plan.
- **Income below 138% FPL:** If your income is below 138% FPL and your state has expanded Medicaid coverage, you may qualify for Medicaid.
- **Income below 100% FPL:** If your income falls below 100% FPL, you probably won't qualify for savings on a Marketplace health plan, but you may qualify for Medicaid.

"Income" above refers to "[modified adjusted gross income](#)" (MAGI). For most people, it's the same or very similar to "[adjusted gross income](#)" (AGI). MAGI isn't a number on your tax return.

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Question:

2. In Case No. U-20757, the Commission adopted the following definition of energy affordability: "the extent to which a household has the resources to meet their home energy needs for heating, cooling and other uses in a healthy, sustainable, and energy efficient manner without compromising a household's ability to meet other basic needs."⁴

- a. Has the Company completed any analysis of energy affordability using the definition adopted by the Commission?
- b. Does the Company have plans to incorporate the Commission's definition of energy affordability in future analyses or programs? If yes, please explain in detail how the Company plans to incorporate this definition into its analyses or programs.
- c. In the testimony of Company Witness Scott A. McPhail II, Witness McPhail notes that the Company's targeted Grid Automation investments improve the system in a number of ways, including "affordability."⁵ Please provide the Company's definition of affordability.

Response:

- b. Yes, this definition of energy affordability is embedded within the work the Company is seeking to do through our Low Moderate Income Customer Enhancement. Per response U21870-SA-CE-221, the Company is committed to ensuring that programs and offerings evolve in alignment with customer needs and are evaluated on their ability to reduce energy burden, prevent disconnection, improve household stability, and support clean energy goals. The Company is committed to prioritizing implementation of programs that have a measurable impact.

Witness: Jessica R. Byrom

Date: August 25, 2025

Question:

2. In Case No. U-20757, the Commission adopted the following definition of energy affordability: "the extent to which a household has the resources to meet their home energy needs for heating, cooling and other uses in a healthy, sustainable, and energy efficient manner without compromising a household's ability to meet other basic needs."⁴

- a. Has the Company completed any analysis of energy affordability using the definition adopted by the Commission?
- b. Does the Company have plans to incorporate the Commission's definition of energy affordability in future analyses or programs? If yes, please explain in detail how the Company plans to incorporate this definition into its analyses or programs.
- c. In the testimony of Company Witness Scott A. McPhail II, Witness McPhail notes that the Company's targeted Grid Automation investments improve the system in a number of ways, including "affordability."⁵ Please provide the Company's definition of affordability.

Response:

C. The Company agrees with the definition adopted by the Commission in Case No. U-20757.

Witness: Scott A. Mcphail

Date: August 25, 2025

Question:

2. In Case No. U-20757, the Commission adopted the following definition of energy affordability: "the extent to which a household has the resources to meet their home energy needs for heating, cooling and other uses in a healthy, sustainable, and energy efficient manner without compromising a household's ability to meet other basic needs."⁴

- a. Has the Company completed any analysis of energy affordability using the definition adopted by the Commission?
- b. Does the Company have plans to incorporate the Commission's definition of energy affordability in future analyses or programs? If yes, please explain in detail how the Company plans to incorporate this definition into its analyses or programs.
- c. In the testimony of Company Witness Scott A. McPhail II, Witness McPhail notes that the Company's targeted Grid Automation investments improve the system in a number of ways, including "affordability."⁵ Please provide the Company's definition of affordability.

Response:

- a. The Company has not completed an analysis that specifically incorporates: "the extent to which a household has the resources to meet their home energy needs for heating, cooling and other uses in a healthy, sustainable, and energy efficient manner without compromising a household's ability to meet other basic needs."
- b. While the Company agrees with the definition of energy affordability, it does not currently have plans to incorporate the details included in the definition into affordability analysis.

Witness: Heidi J. Myers

Date: August 25, 2025

Program Effect on Payment Segmentation

Evaluation Report
Prepared by: Caleb Forner
Current Primary Contacts: Caleb Forner, Ryan Keilen

Date: July 24th 2025

OVERVIEW

This report examines the effect the CARE program and EWR IQ measures have on the customer's payment behavior with respect to Customer Payment Segmentation.

KEY MESSAGES

- Timeframes for this data include customers from January of 2023 to July of 2025
- Primary payment segment metrics evaluated
 - Retention Rates
 - Inflow and Outflow
 - Transition Rates
- CARE graduates and IQ EWR participants are being compared to the residential customer baseline payment segment results

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RESOURCES

Data sources were formatted to be able to compare customer payment segment movement for CARE, IQ EWR, and the baseline for residential customers.

Source	Purpose
all_payment_performance.sql - Repos	Query to get baseline customer payment segmentation data
care_payment_performance.sql - Repos	Query to get CARE graduate customer payment segmentation data
ewr_payment_performance.sql - Repos	Query to get IQ EWR customer payment segmentation data
program_payment_segment_eval.ipynb - Repos	Script to evaluate and visualize payment performance data
https://m365.cloud.microsoft/	MS365 copilot used to format and present findings

RESULTS**CARE PAYMENT SEGMENT MOVEMENT**

For CARE customer payment segment movement we evaluated 1,799 accounts that had graduated from the CARE program between January and July of 2025. This allows us to calculate their payment segment at the point of graduation and 24 months prior to the graduation which would indicate their payment segment upon entry into the CARE program.

Retention Rate Highlights

- While retention rates are not of particular interest in this dataset, one notable segment is Wont Pay retaining 32.97% of customers indicating established payment behavior
- Lower Always Pay retention rate of 50.00% represents the much smaller population starting in this segment

Inflow & Outflow Dynamics

- Always Pay has the highest inflow representing 53.39% of inflow movement
- Wont Pay and Never Pay represent has the highest outflow representing 90.80% of all outflow movement

Transition Behavior Insights

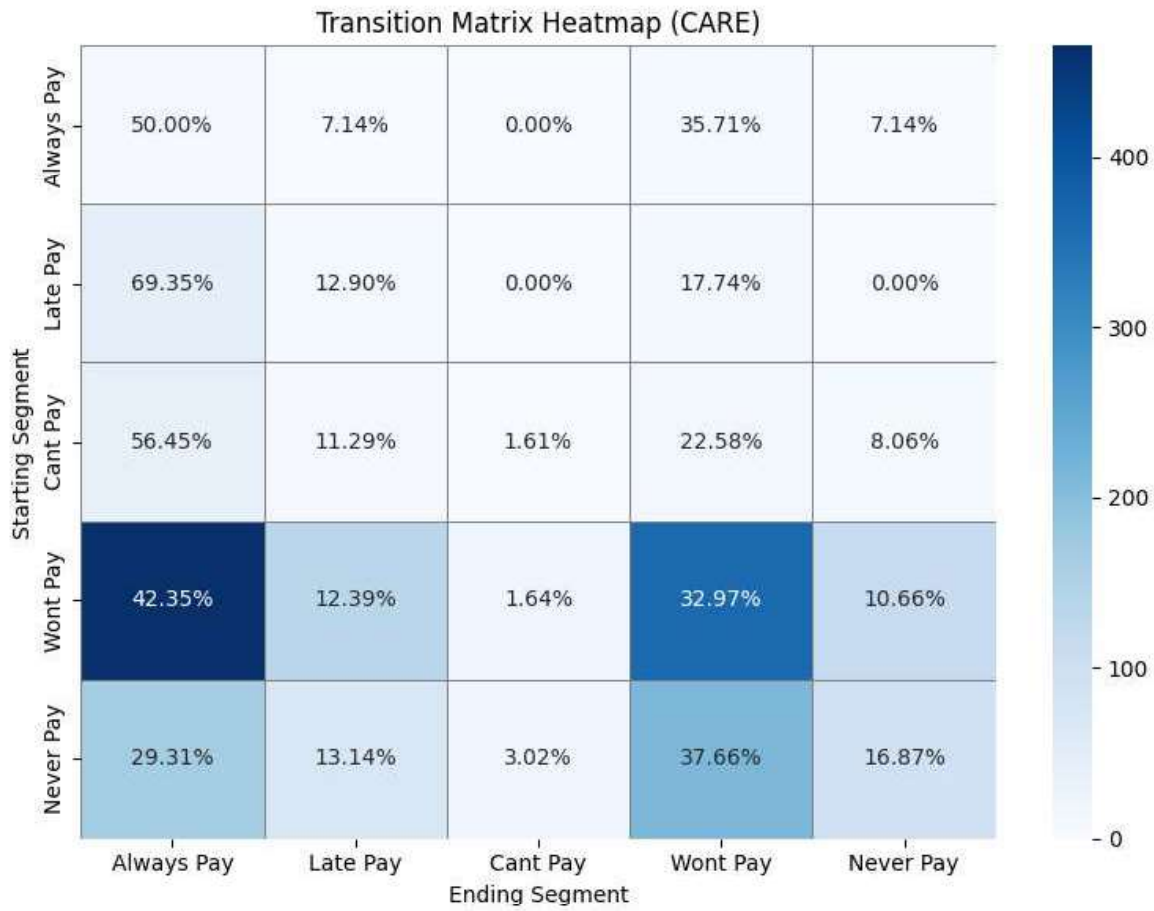
- Transition from Wont Pay to Always Pay is the most notable transition (42.35%)
- Never Pay exhibits strong transitions to Always Pay (29.31%) and Wont Pay (37.66%) displaying an increase in desirable payment behavior

Starting Payment Segment	Always Pay	Late Pay	Cant Pay	Wont Pay	Never Pay	Segment Total	Retention Pct
Always Pay	7	1	-	5	1	14	50.00%
Late Pay	43	8	-	11	-	62	12.90%
Cant Pay	35	7	1	14	5	62	1.61%
Wont Pay	465	136	18	362	117	1,098	32.97%
Never Pay	165	74	17	212	95	563	16.87%
Total	715	226	36	604	218	1,799	-
Total Pct	39.74%	12.56%	2.00%	33.57%	12.12%	-	-

Table 1.1 – CARE Segment Data

Payment Segment	Inflow	Inflow Pct	Outflow	Outflow Pct
Always Pay	708	53.39%	7	0.53%
Late Pay	218	16.44%	54	4.07%
Cant Pay	35	2.64%	61	4.60%
Wont Pay	242	18.25%	736	55.51%
Never Pay	123	9.28%	468	35.29%

Table 1.2 – CARE Segment Inflow/Outflow



Visual 1.1.1 – Transition Matrix Heatmap (CARE)

IQ EWR PAYMENT SEGMENT MOVEMENT

For IQ EWR customer payment segment movement we evaluated 63,405 accounts that participated in an income qualified EWR program from January 2023 to July of 2024. This allows us to capture the customers payment segment upon initial participation in the IQ EWR program and then their payment segment 12 months after participation.

Retention Rate Highlights

- Always Pay retains 76.27% of its customers — the strongest among all segments, indicating high reliability.
- Wont Pay follows with a solid 60.51%, showing persistent behavior that may be difficult to shift.
- Never Pay retains 48.70%, suggesting moderate disengagement with potential for reactivation.
- Late Pay (24.61%) and Cant Pay (3.28%) show low retention, confirming their roles as transitional or unstable segments.

Inflow & Outflow Dynamics

- Always Pay receives the highest inflow (5,354), reinforcing its role as a recovery destination.
- Wont Pay has the highest outflow (10,429), reflecting its dynamic and volatile nature.
- Cant Pay has nearly equal inflow (918) and outflow (886), indicating a short-term or crisis state.
- Late Pay and Never Pay both show moderate inflow and outflow, with Late Pay acting as a pivot point between improvement and deterioration.

Transition Behavior Insights

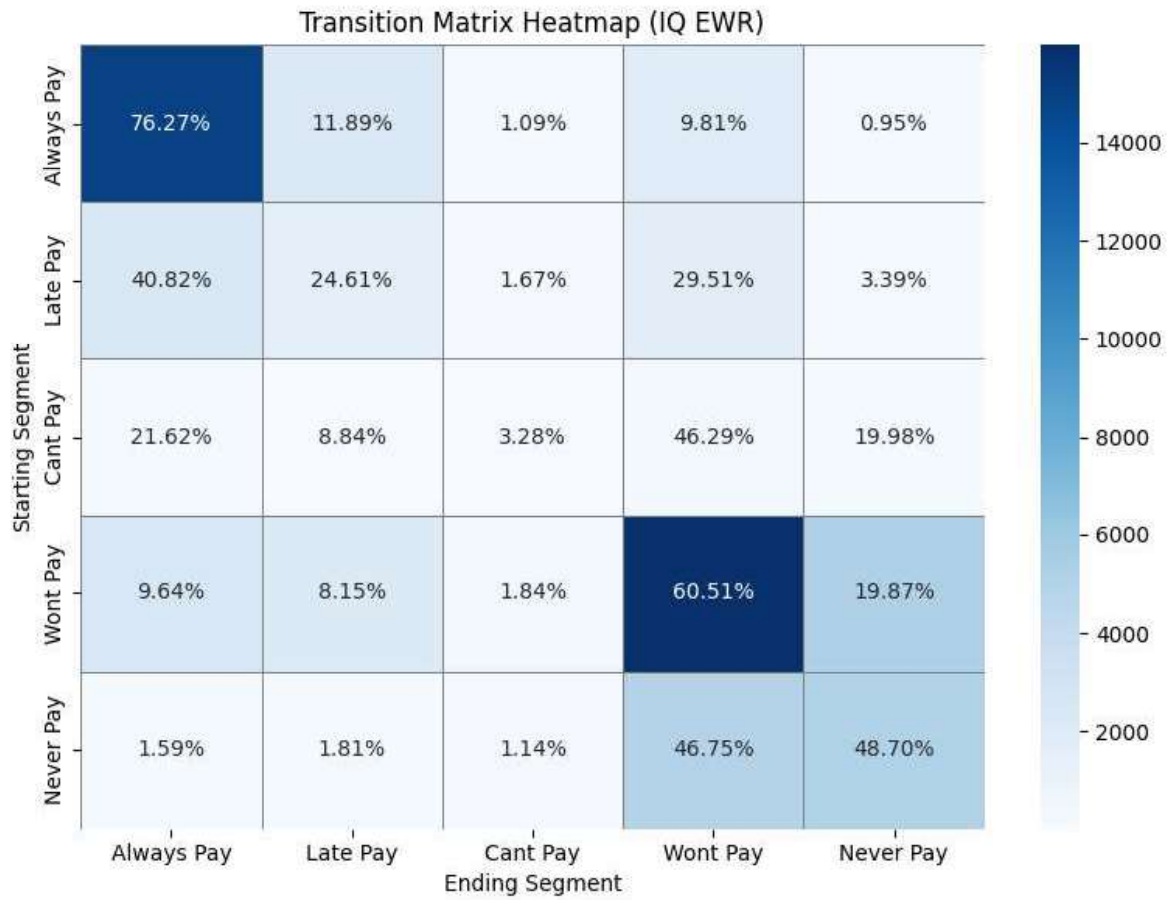
- Late Pay customers mostly move to Always Pay (40.82%), but a significant portion also shift to Wont Pay (29.51%).
- Cant Pay customers primarily transition to Wont Pay (46.29%), with some recovery to Always Pay (21.62%).
- Wont Pay has a concerning flow to Never Pay (19.87%), but also some recovery to Always Pay (9.64%).
- Never Pay customers often return to Wont Pay (46.75%), suggesting a cycle of disengagement.

Starting Payment Segment	Always Pay	Late Pay	Cant Pay	Wont Pay	Never Pay	Segment Total	Retention Pct
Always Pay	14,958	2,332	213	1,924	186	19,613	76.27%
Late Pay	2,443	1,473	100	1,766	203	5,985	24.61%
Cant Pay	198	81	30	424	183	916	3.28%
Wont Pay	2,546	2,151	485	15,977	5,247	26,406	60.51%
Never Pay	167	190	120	4,902	5,106	10,485	48.70%
Total	20,312	6,227	948	24,993	10,925	63,405	-
Total Pct	32.04%	9.82%	1.50%	39.42%	17.23%	-	-

Table 2.1 – IQ EWR Segment Data

Payment Segment	Inflow	Inflow Pct	Outflow	Outflow Pct
Always Pay	5,354	20.70%	4,655	18.00%
Late Pay	4,754	18.38%	4,512	17.45%
Cant Pay	918	3.55%	886	3.43%
Wont Pay	9,016	34.86%	10,429	40.33%
Never Pay	5,819	22.50%	5,379	20.80%

Table 2.2 –IQ EWR Segment Inflow/Outflow



Visual 2.1.1 – Transition Matrix Heatmap (IQ EWR)

BASELINE PAYMENT SEGMENT MOVEMENT

As a baseline, the population of ~2.4M residential customers were evaluated from August 2024 to July 2025. These customers represent payment segment movement throughout the time frame.

Retention Rate Highlights

- Always Pay has the highest retention at 86.56%, indicating strong customer loyalty and payment consistency.
- Wont Pay follows with a solid 60.24%, suggesting entrenched behavior that may be difficult to shift.
- Never Pay retains 40.24% of its customers, implying these accounts may be awaiting further action or resolution.
- Late Pay and Cant Pay show low retention rates (27.61% and 2.18%), marking them as highly transitional and unstable segments.

Inflow & Outflow Dynamics

- Always Pay receives the highest inflow of customers, reinforcing its role as the most desirable segment.
- Late Pay customers primarily transition to Always Pay (47.14%), showing potential for recovery.
- However, 23.89% of Late Pay customers shift to Wont Pay, signaling a risk of deterioration.

Transition Behavior Insights

- Always Pay and Wont Pay are the most stable segments, with high retention and consistent inflow/outflow patterns.
- Late Pay acts as a transitional hub, with customers frequently moving either up to Always Pay or down to Wont Pay.
- The movement from Wont Pay to Never Pay and vice versa suggests a cycle of disengagement that may require targeted intervention.

Starting Payment Segment	Always Pay	Late Pay	Cant Pay	Wont Pay	Never Pay	Segment Total	Retention Rate
Always Pay	1,155,384	112,057	2,663	62,223	2,492	1,334,819	86.56%
Late Pay	147,571	86,420	1,328	74,780	2,929	313,028	27.61%
Cant Pay	211	1,635	321	10,124	2,463	14,754	2.18%
Wont Pay	111,772	68,437	6,993	382,798	65,435	635,435	60.24%
Never Pay	336	2,198	1,103	72,932	51,550	128,119	40.24%
Total	1,415,274	270,747	12,408	602,857	124,869	2,426,155	-
Total Pct	58.33%	11.16%	0.51%	24.85%	5.15%	-	-

Table 3.1 – Baseline Segment Data

Payment Segment	Inflow	Inflow Pct	Outflow	Outflow Pct
Always Pay	259,890	34.67%	179,435	23.93%
Late Pay	184,327	24.59%	226,608	30.23%
Cant Pay	12,087	1.61%	14,433	1.93%
Wont Pay	220,059	29.35%	252,637	33.70%
Never Pay	73,319	9.78%	76,569	10.21%

Table 3.2 – Baseline Segment Inflow/Outflow



Visual 3.1.1 – Transition Matrix Heatmap (All Residential Customers)

OBSERVATIONS**• CARE Program Graduates**

- Customers graduating from the CARE program show **significantly higher transitions** from Wont Pay and Never Pay into Always Pay, outperforming the baseline.
- CARE graduates demonstrate the **highest inflow percentage** into Always Pay from lower-risk segments, indicating strong recovery and engagement.
- Overall, CARE graduates exhibit **notable improvements in payment behavior**, with meaningful upward movement across segments.

• IQ EWR Customers

- Customers receiving IQ EWR measures show **no significant improvement** in payment segment transitions compared to the baseline.
- Slightly **lower retention rates** are observed for Always Pay and Late Pay segments among IQ EWR customers.
- However, IQ EWR recipients in the Cant Pay segment **show increased transitions to Always Pay**, suggesting some positive impact.
- Similarly, Never Pay customers under IQ EWR show **modest upward movement** to Always Pay, though not as pronounced as CARE graduates.

5

U21870-UCC-CE-0369

Page 1 of 1

Question:

5. Refer to Consumers Energy Co.'s Response to UCC's First Discovery Request, U21870-UCC-CE-0233_Byrom_ATT_1. Please provide definitions of the following terms used in the Program Effect on Payment Segmentation analysis, including any quantitative measures used in the definitions to segment customers: Always Pay, Late Pay, Cant Pay, Wont Pay, and Never Pay.

Response:

The logic below is how the segments are determined. The customers past 12 months of monthly invoices are analyzed to determine which segment they belong to.

****Always Pay****

- Rarely late — all payments on time

****Late Pay****

- Pays in full but has occasional late payments.

****Can't Pay****

- Has moderate on-time payment behavior (at least 50%).

****Won't Pay****

- Frequently late; has multiple late payments or open invoices.

****Never Pay****

- Multiple past-due bills

Witness: Jessica R. Byrom

Date: September 10, 2025

Question:

5. Refer to Direct Testimony of Jessica R. Byrom at Pages 23-28 in which the witness outlines the Company's plans for the LMI Customer Support Enhancement project.

- a. Witness Byrom states that "Proactive Communication and Program Awareness will be built to identify and reach out to customers showing early signs of crisis, educating them about assistance options and directing them to the streamlined, digital workflow."⁷
 - i. Please describe in detail the Company's process for identifying "customers showing early signs of crisis" under this project.
 - ii. Witness Byrom states that "[e]ducational initiatives funded by this allocation will increase awareness about the Company's programs through targeted communication campaigns and partnerships with community programs."⁸ Please describe in detail what these "targeted communication campaigns" will look like and which "community programs" the Company plans to partner with.
- b. Witness Byrom states that "New & Improved LMI Offerings will integrate existing offerings such as payment plans, EWR, DR, renewable energy programs, and more to provide a comprehensive support system for LMI customers."⁹
 - i. Please describe in detail how the "comprehensive support system" will function for customers, including what steps the Company plans to take to provide this support system to customers.
 - ii. Please list and describe in detail all the "existing offerings" that will be integrated into the proposed "comprehensive support system."
- c. Witness Byrom provides a "cost breakdown by Core Function"¹⁰ for the requested funds in the following chart:

Core Functions	Cost
Simplified Program Enrollment	\$600,000
Proactive Communication and Program Awareness	\$370,000
New & Improved LMI Offerings	\$700,000
Continuous Improvement	\$200,000
Total	\$1.87M

- i. Please provide a list of how much money will be spent on specific activities, upgrades, or programs within each "Core Function" category.
- ii. Witness Byrom states that under New and Improved LMI Offerings, "[f]unding will support the redesign of current offerings to better serve LMI customers, making them more accessible and effective. This includes simplifying eligibility requirements, enhancing program capacity and scalability, and ensuring that the programs deliver meaningful value."¹¹

Please list each "current offering" that will be redesigned and how much of the investments will be allocated to that redesign.

Response:

ai. As part of the LMI Customer Support Enhancement project, Consumers Energy is actively working to build and refine its ability to identify customers who may be approaching financial distress. While foundational capabilities exist, the Company recognizes that continued advancement of tools, analytics, and outreach strategies is necessary to fully support customers before they reach a crisis point. This approach is designed to engage customers before they reach a crisis point, increasing the likelihood of successful intervention.

The Company is enhancing its use of behavioral indicators, which include:

- **De-enrollment from autopay:** May reflect emerging financial instability.
- **Missed or partial payments:** Indicate difficulty in meeting monthly obligations.
- **Past due balances:** Signal a growing inability to manage energy costs.
- **High bill notifications:** Suggest potential affordability challenges, especially during peak usage periods.
- **Payment plan default:** Customers falling off structured payment plans due to non-payment are at elevated risk.
- **Disconnection notices or history:** A pattern of disconnection-related activity is a strong indicator of crisis.
- **Drop-off from assistance programs:** Customers who previously enrolled but did not complete or maintain participation may still be in need and facing challenges.
- **Low or declining engagement with assistance programs:** May suggest barriers to access or awareness.
- **Frequent changes in billing preferences:** May reflect financial uncertainty or difficulty managing due dates.
- **Multiple payment extensions or arrangements:** Repeated reliance on extensions may indicate chronic financial strain.

To move from reactive support to proactive engagement, the Company is focused on strengthening its data analytics capabilities, improving digital workflows, and expanding outreach mechanisms. These efforts will enable earlier identification of at-risk customers and more personalized, timely support.

aii.

The campaigns will be built around the following strategies:

- **Behavioral-Based Outreach:** Using data analytics to identify customers showing early signs of financial distress (e.g., missed payments, high bills, payment plan defaults), and proactively reaching out with tailored messaging.
- **Multi-Channel Engagement:** Delivering communications through customers' preferred channels, including:
 - SMS and email alerts
 - Mobile app notifications
 - Website banners and personalized dashboards
 - IVR prompts during customer calls
 - Printed inserts in bills for customers who prefer paper communication
- **Notification Preference Center:** A new digital feature that allows customers to select how and when they receive communications, ensuring messages are timely and relevant.
- **Simplified Messaging:** Campaigns will use plain language and visual aids to explain program benefits, eligibility, and enrollment steps—reducing confusion and increasing accessibility.
- **Seasonal and Event-Based Campaigns:** Communications will be timed around high-bill seasons (e.g., winter heating months) and major life events (e.g., moving, job loss, loss of income) to maximize relevance.
- **Digital Enrollment Flow Integration:** Campaigns will link directly to the Company's streamlined digital enrollment tool, allowing customers to self-identify and enroll in multiple programs in one session.

Community Partnerships:

To expand reach and build trust, Consumers Energy plans to collaborate with a diverse set of community organizations, including:

- **Michigan 2-1-1:** Providing direct links and click-to-call options to connect customers with state and local assistance resources.
- **Local Nonprofits and Human Service Agencies:** Partnering with organizations that serve low- and moderate-income households to co-host events, distribute materials, and assist with enrollment.
- **Faith-Based Organizations and Community Centers:** Leveraging trusted community hubs to share information and offer in-person support.

- **Food Banks and Housing Assistance Providers:** Integrating energy assistance messaging into broader support services.
- **Educational Institutions and Workforce Development Programs:** Reaching moderate-income customers through job training and adult education networks.
- **Health and Human Service Agencies:** Coordinating with Medicaid and SNAP outreach efforts to identify and support eligible customers.

These partnerships will help ensure that communication efforts are culturally relevant, locally informed, and trusted, especially for customers who may be hesitant to engage directly with the utility.

bi. The “comprehensive support system” for LMI customers is built around a single, streamlined enrollment flow that consolidates access to multiple assistance programs into one cohesive experience. This system is designed to simplify the customer journey, reduce barriers to participation, and deliver personalized support.

Current Functionality

Today, the comprehensive support system is available through the Consumers Energy website, where customers must first authenticate their account to access the enrollment flow. Once authenticated, customers can:

- Self-identify as low or moderate income
- Complete a brief eligibility assessment
- Receive personalized recommendations for relevant programs
- Enroll in one or more offerings in a single, guided session

This secure, account-based access ensures that program recommendations are tailored to the customer’s actual usage, billing history, and eligibility status.

Future Expansion Plans

To further improve accessibility and reach, the Company intends to expand this enrollment flow across additional customer interaction channels. These future plans include:

- **Live Agent Support (Contact Center)**
Training representatives to guide customers through the same enrollment flow during phone calls, using a mirrored interface that ensures consistency with digital experience.
- **Interactive Voice Response (IVR)**
Incorporating a simplified version of the enrollment flow into the IVR system, allowing customers to navigate eligibility and program options using voice or keypad prompts, with the option to transfer to a live agent.

- **Mobile App Integration**

While not currently available in the mobile app, the Company plans to incorporate the enrollment flow into the app to provide a seamless, on-the-go experience. This would include push notifications, personalized dashboards, and real-time updates on program status.

- **Community Partner Channels**

Equipping partner organizations with access to the enrollment tool so they can assist customers during outreach events or direct engagement.

These planned enhancements are intended to ensure that customers can access the comprehensive support system in the way that best suits their preferences and circumstances—whether online, by phone, or in person.

bii. The comprehensive support system consolidates access to a wide range of existing offerings into a single, streamlined enrollment experience for LMI customers. These offerings are organized across five key program categories: Energy Waste Reduction (EWR), Demand Response (DR), Renewable Energy, Billing and Payment, and Energy Assistance.

Offerings Already Integrated into the Experience (via Website Authentication)

Energy Waste Reduction (EWR)

- Home Energy Analysis – In-home or virtual assessments to identify energy-saving opportunities.
- Helping Neighbors Program – Free energy-saving products for income-qualified customers.
- Home Energy Analysis – Single & Multi-Family Renter – Tailored assessments for renters in single or multi-family dwellings.

Demand Response (DR)

- Smart Thermostat Program – Customers receive a \$25 gift card for staying enrolled in the program.

Renewable Energy

- Green Giving – Customers earn monthly bill credits equal to the value of renewable energy generated and sold by Consumers Energy.

Billing and Payment

- Budget Plan – Predictable monthly billing based on average usage.
- Customer Selected Due Date – Flexibility to choose a bill due date aligned with income schedules.
- Billing & Payment Alerts – Text/email reminders to help customers stay current.
- High Bill Alerts – Notifications when usage exceeds expected levels.

- Outage Alerts – Real-time updates on service interruptions.

Energy Assistance

- Link to MI Bridges – Direct access to state assistance resources.

Offerings Planned for Integration in Q3 + Q4 2025:

Payment and Billing

- Flex Pay – Pay-as-you-go billing option for greater control.
- Payment Holds – Temporary suspension of payment requirements during hardship.
- Shut Off Protection Plan (SPP) – After a down payment, customers pay a fixed monthly amount based on past usage,

Energy Waste Reduction (EWR)

- Furnace Tune-Ups – Energy efficiency service for qualifying households.
- Air Purifiers – Health and comfort-related energy efficiency offering.

Evaluation of Future Offerings

Consumers Energy is committed to ensuring that the comprehensive support system continues to evolve in alignment with customer needs and program effectiveness. The Company's long-term vision is to make this system a "one-stop enrollment center" where customers can easily discover, understand, and enroll in all relevant programs and services—regardless of how they choose to engage.

To achieve this, the Company will maintain a structured and iterative approach to evaluating future offerings for inclusion in the enrollment experience. This includes:

- **Customer Feedback and Engagement Metrics**

The Company will regularly collect and analyze feedback from customers using the enrollment flow, including satisfaction ratings, completion rates, and program uptake. These insights will help identify which offerings are most valuable and where gaps may exist.

- **Community Partner Input**

Feedback from community organizations and outreach partners will be used to understand barriers customers face and identify additional offerings that could provide meaningful support.

- **Behavioral and Usage Data**

The Company will monitor customer behavior across channels—such as call center interactions, digital engagement, and program enrollment trends—to identify emerging needs and opportunities for integration.

- **Program Performance and Impact Analysis**

- Offerings will be evaluated based on their ability to reduce energy burden, prevent disconnection, improve household stability, and support clean energy goals. Programs that demonstrate measurable impact will be prioritized for inclusion.

- **Cross-Departmental Collaboration**

The evaluation process will involve collaboration across teams managing Energy Waste Reduction (EWR), Demand Response (DR), Renewable Energy, Billing & Payment, and Energy Assistance portfolios to ensure alignment and consistency.

- **Scalability and Accessibility Review**

The Company will assess whether offerings can be delivered equitably across customer segments and channels, including digital, live agent, IVR, and community-based support.

This approach ensures that the comprehensive support system remains dynamic, inclusive, and responsive. The Company is committed to continuously adding offerings that provide meaningful assistance to customers and reflect the evolving landscape of customer needs and available resources—ultimately creating a centralized, accessible hub for energy-related support.

ci.

Core Function	Activity	Cost
Simplified Program Enrollment	Development of single enrollment flow	\$200,000
	User interface design and testing	\$150,000
	Integration of offerings into one experience	\$150,000
	Channel planning (IVR, live agent, mobile app)	\$100,000
Proactive Communication & Program Awareness	Targeted outreach campaigns (email, SMS)	\$120,000
	Notification preference center development	\$90,000
	Behavioral analytics for customer identification	\$90,000
	Community partner coordination for outreach	\$70,000
New & Improved LMI Offerings	Program evaluation + Redesign of existing offerings	\$150,000

	Simplification of eligibility criteria and system updates	\$250,000
	Integration of new offerings into enrollment flow	\$150,000
	Scalability and capacity enhancements + operational enhancements	+\$150,000
Continuous Improvement	Customer feedback collection and analysis	\$70,000
	Iterative design updates based on engagement	\$50,000
	Reporting and performance tracking tools	\$40,000
	Evaluation framework for future offerings	\$40,000

cii. The Company is actively developing a comprehensive support system for LMI customers, centered around a streamlined, centralized enrollment experience. While several offerings have already been integrated and others are scheduled for inclusion in Q4 2025, the Company is still evaluating which existing programs will be redesigned under the “New & Improved LMI Offerings” initiative.

This initiative is supported by a \$700,000 investment, which will fund:

- Program evaluation and redesign planning
- Simplification of eligibility criteria and system updates
- Integration of new offerings into the enrollment flow
- Scalability enhancements and operational improvements

Redesign Objectives:

The redesign effort aims to ensure programs are:

- Accessible – Simplifying eligibility and enrollment
- Scalable – Expanding capacity without reducing service quality
- Valuable – Delivering meaningful benefits that reduce energy burden
- Engaging – Promoting participation through clear communication and reduced barriers

Evaluation Focus Areas:

The Company is reviewing offerings across five key areas:

- Energy Waste Reduction (EWR)
- Demand Response (DR)
- Renewable Energy
- Billing & Payment
- Energy Assistance

As part of this effort, the Company has proposed expanding eligibility thresholds for:

- EWR Income-Qualified Products – Up to 400% of the Federal Poverty Level (FPL) (requested in the Company’s current EWR Plan, U-21680)
- Shut-Off Protection Plan (SPP) – Up to 400% FPL (requested in the Company’s current electric rate case, U-21780),

These changes reflect a commitment to better serve moderate-income customers who may not qualify under traditional low-income criteria but still face financial hardship.

The Company will continue to assess its portfolio using iterative analysis and customer feedback to determine which offerings should be prioritized for redesign and integration.

Witness: Jessica R. Byrom

Date: August 25, 2025

June 12, 2025

Ms. Lisa Felice
Michigan Public Service Commission
7109 W. Saginaw Hwy.
Lansing, MI 48909

Via E-File

RE: MPSC Case No. U-20757, U-20929, and U-21021

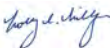
Dear Ms. Felice:

Attached please find the enclosed documents for filing:

- Comments on DTE Electric Company and DTE Gas Company and Consumers Energy Company PIPP Pilots by Michigan Environmental Council, Natural Resources Defense Council, Citizens Utility Board of Michigan, Ecology Center, and Vote Solar.

Thank you for your assistance in this matter. If you have any questions, please feel free to contact me.

Sincerely,


Digitally signed
by Holly Hillyer
Date: 2025.06.12
16:34:50 -04'00'

Holly L. Hillyer
holly@tropospherelegal.com

CC: Parties to Case No. U-20757, U-20929, and U-21021

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion, to review its response to the novel coronavirus (COVID-19) pandemic, including the statewide state of emergency, and to provide guidance and direction to energy and telecommunications providers and other stakeholders. U-20757

In the matter of the application of **DTE GAS COMPANY AND DTE ELECTRIC COMPANY** for approval of a Low-Income Payment Stability Plan Pilot Program U-20929

In the matter of the application of **CONSUMERS ENERGY COMPANY** for approval of a Percent of Income Payment Plan Pilot. U-21021

COMMENTS ON DTE ELECTRIC COMPANY AND DTE GAS COMPANY AND CONSUMERS ENERGY COMPANY PIPP PILOTS BY

**MICHIGAN ENVIRONMENTAL COUNCIL,
NATURAL RESOURCES DEFENSE COUNCIL,
CITIZENS UTILITY BOARD OF MICHIGAN, ECOLOGY CENTER,
AND VOTE SOLAR**

June 12, 2025

In response to the Commission’s May 15, 2025, Order providing interested persons an opportunity to submit comments regarding DTE Electric Company and DTE Gas Company’s (DTE) Payment Stability Plan (PSP) pilot and Consumers Energy Company’s (Consumers) Percent of Income Payment Plan (PIPP) pilot, the Citizens Utility Board of Michigan (CUB), Ecology Center, Michigan Environmental Council (MEC), Natural Resources Defense Council (NRDC), and Vote Solar submit the following comments.

I. Introduction

“[T]he key to a low-income rate is the affordability of that rate to low-income customers.”¹

That remains as true today as when the Commission first said it in 2008, when it considered this statutory provision now contained in MCL 460.11(2): “Notwithstanding any other provision of this act, the commission may establish eligible low-income customer or eligible senior citizen customer rates. Upon filing of a rate increase request, a utility shall include proposed eligible low-income customer and eligible senior citizen customer rates and a method to allocate the revenue shortfall attributed to the implementation of those rates upon all customer classes.” The Commission found that this provision “obligate[d] Detroit Edison to include a properly designed low-income rate with all of its future rate case filings” and instructed that, “[i]n so doing, Detroit Edison shall focus on proposals *that will result in a rate that is affordable by the utility’s low-income customers.*”² While Consumers and DTE have both articulated multiple goals for their low-income energy assistance programs – improving energy access, reducing arrears, increasing full and timely payments, and reducing energy consumption – the Commission and the companies

¹ Case No. U-15244, Order, December 23, 2008, p 93 (emphasis added).

² *Id.* (emphasis added).

must not lose sight of the fact that the primary goal is to have a rate that makes energy affordable to low-income customers.

These comments will provide a brief overview of events leading to the filing of the PIPP reports, discuss both positive attributes and concerns about the pilots and reports, and conclude with several recommendations. In sum, we recommend that the Commission require Consumers and DTE to present proposals for the full implementation of PIPPs with a maximum 6% total energy burden by the end of next year; consider obtaining assistance from third-party experts or evaluators to ensure appropriately designed programs and outcome measures; and provide an opportunity for public comment on the upcoming Staff report in Case No. U-20757.

II. Background

The low-income energy assistance landscape in Michigan is complicated. Federal funds, including Low-Income Home Energy Assistance Program (LIHEAP) funds administered by the Michigan Department of Health and Human Services (MDHHS), provide crisis relief through the Home Heating Credit (HHC) and State Emergency Relief (SER). The surcharge-funded Low-Income Energy Assistance Fund (LIEAF), administered by the MPSC, provides for longer-term assistance through Michigan Energy Assistance Program (MEAP) Affordable Payment Plans (APPs), which include Consumers' Consumers Affordable Resource for Energy (CARE) program and DTE's Low-Income Self-Sufficiency Plan (LSP),³ as well as one-time crisis payments. And both Consumers and DTE provide monthly relief through their respective Residential Income Assistance (RIA) credits, which are equal to each company's fixed monthly customer charge, and Low-Income Assistance (LIA) credits, which range from \$30 to \$50 depending on the utility.

³ These programs were recently modified and the companies refer to the new versions as CARE Modified Budget (CARE MB) and LSP Modified (LSPM).

Participation in these programs is generally limited to customers with household incomes at or below 150% of the federal poverty level (FPL),⁴ leaving out a substantial number of customers with incomes that are above the eligibility threshold but still not enough to make ends meet. Even with the 150% FPL limit, funding for these programs is insufficient to ensure that all eligible customers receive needed assistance.

Against this backdrop, Consumers and DTE conducted the PIPP pilots that are the subject of these comments. The impetus for the PIPP pilots can be traced back to 2020, when the Commission considered proposals in Consumers and DTE electric rate cases⁵ to improve the companies' low-income assistance programs, including recommendations from Attorney General, MEC, NRDC, Sierra Club, and CUB witness Roger Colton that the companies increase and restructure the LIA credit to more effectively reduce excess energy burdens,⁶ and a proposal in the Consumers gas rate case by the company to implement a PIPP.⁷ The Commission generally declined to adopt any of the proposed changes to existing low-income programs but directed Consumers and DTE to present proposals for new pilot programs developed in collaboration with Staff and interested partners and structured around Mr. Colton's analyses, and Consumers agreed in settlement in its gas rate case to file a PIPP pilot.⁸ Consumers and DTE filed *ex parte* pilot

⁴ The HHC eligibility threshold is 110% FPL.

⁵ Case Nos. U-20561 and U-20697.

⁶ Specifically, in Case No. U-20561, DTE proposed increasing the funding for its LIA credit program – a pilot at that time – and raising the enrollment cap from 32,000 to 50,000 to accommodate an expected increase in enrollment in its LSP, as it believed pairing the LSP assistance with the LIA credit was the most effective approach. Mr. Colton recommended increasing the LIA credit from \$40 to \$60 and providing an additional \$25 to households at or below 50% FPL, as well as redirecting the RIA credit to certain households up to 200% FPL. See Case No. U-20561, Order, May 8, 2020, pp 238-39; Case No. U-20697, Order, December 17, 2020, p 255-63

⁷ Consumers agreed in settlement in gas rate Case No. U-20650 to present a PIPP pilot for *ex parte* approval within 6 months. Case No. U-20650, Order, September 10, 2020, Ex A, pp 6-7.

⁸ See Case No. U-20561, Order, May 8, 2020, p 239; Case No. U-20697, Order, December 17, 2020, p 261-63

applications in Case Nos. U-21021 and U-20929, respectively. The Commission approved DTE's pilot in April 2021 and Consumers' pilot in February 2022.

Meanwhile, in April 2020, the Commission opened Case No. U-20757 to address issues arising out of the COVID-19 pandemic. Among other things, the Commission directed Staff to produce a report and recommendations on improvements to the MEAP-funded APPs (CARE for Consumers and LSP for DTE) and other energy assistance programs.⁹ Staff filed its report in December 2020.

In February 2021, the Commission directed Staff to convene the Energy Affordability and Accessibility Collaborative (EAAC) to collaborate with the existing Energy Waste Reduction and Low-Income Workgroup to address issues raised in the December 2020 report and directed Staff to file an interim report on any resulting progress or recommendations by December 2021.¹⁰ By the time the December 2021 report was filed, the EAAC had established an Affordability, Alignment, and Assistance (AAA) subcommittee, which was "tasked with looking at aspects of energy affordability including streamlining and making more accessible existing energy assistance programs, researching next generation APPs, analyzing collections processes, integration with EWR and weatherization, and rate design."¹¹ The Commission, after reviewing the December 2021 report, issued an order directing Staff to file another interim report by December 2022 – a deadline the Commission ultimately extended to March 2023.¹²

The Commission invited comments on the March 2023 report, which contained several recommendations, including that the Commission extend the EAAC through the end of 2024 because it needed more time to evaluate and make recommendations on the PIPP pilots. CUB filed

⁹ Case No. U-20757, Order, July 23, 2020, p 43-44.

¹⁰ Case No. U-20757, Order, February 18, 2021, p 15.

¹¹ Case No. U-20757, Order, February 10, 2022, p 9.

¹² Case No. U-20757, Order, February 10, 2022, p 15; Case No. U-20757, Order, November 18, 2022, p 5.

comments pointing out that this likely meant delaying actual PIPP implementation until after 2025 – an “unacceptably long timeline for low-income and vulnerable customers to be waiting for programs that can actually bridge the gap between the amount they can reasonably pay and the amount they are being charged for essential services” – and that further pilot study was unnecessary when many other states have had PIPPs in place for years.¹³ CUB also pointed out that Roger Colton had presented the rationale for and essential elements of PIPPs at one of the EAAC’s first meetings.¹⁴ Staff replied that approving the PIPPs before “efficiency, cost-benefit, and . . . comparative analyses” could be performed would be “premature” and that, while other states do have PIPPs, Michigan needed to “analyze the functionality of its unique pilot and compare it against existing energy assistance unique to the state.”¹⁵ In December 2023, the Commission issued an order that, among other things, adopted the March 2023 report’s recommendation to extend the EAAC.¹⁶

While the EAAC waited for Consumers and DTE to complete their PIPP pilots, both Consumers and DTE continued their longstanding practice of requesting hundreds of millions of dollars in rate increases each year. In Case No. U-21585, Consumers requested a \$303 million increase; in Case No. U-21534, DTE Electric requested a \$456.4 million increase. In Case No. U-21534, DTE proposed increasing its LIA credit by \$10 so that it would provide roughly the same proportion of energy burden relief it did when first introduced in 2015. In both cases, Roger Colton testified on behalf of MEC, NRDC, and CUB, and again recommended changes to the LIA credit that would more effectively reduce excess energy burdens. Other intervenors also presented

¹³ Case No. U-20757, File No. U-20757-0556, Comments from the Citizens Utility Board of Michigan, pp 2-3.

¹⁴ *Id.* at 3.

¹⁵ Case No. U-20757, File No. U-20757-0562, Michigan Public Service Commission Staff’s Reply to Comments, p 5.

¹⁶ Case No. U-20757, Order, December 21, 2023, p 5.

proposals for improving the companies' respective low-income energy assistance programs. Staff opposed all proposed changes and recommended that the Commission do nothing until after the EAAC and its AAA subcommittee completed their review of the PIPP pilots and presented their findings and recommendations to the Commission in a report that is expected in August of this year.¹⁷ Except for approving DTE's proposed \$10 increase to the LIA credit, the Commission adopted Staff's recommendation to maintain the status quo.¹⁸

Now, five years after the Commission first directed Consumers and DTE to present their new pilots, the pilots are complete and Consumers and DTE have filed their reports.¹⁹ The reports describe the companies' respective PIPP pilots, purport to compare their results to those of other available low-income assistance programs, and make recommendations regarding full PIPP implementation. While both pilots improved on certain aspects of existing programs, both also contained serious design flaws – especially DTE's PSP, which established payments based on an excessive 10% total energy burden. Neither report contains sufficient data, nor controls sufficiently for variables, to provide an adequate foundation for the conclusions Consumers and DTE draw about the pilots' performance relative to other low-income assistance programs.

III. Positives common to both pilots

Both pilots had notable positive attributes that should be maintained. First and foremost, monthly payment amounts were based on each customer's income, which targets excessive energy burdens more effectively than flat credits or tiered payment amounts that may offer more assistance

¹⁷ Case No. U-21534, Order, January 23, 2025, p 400-402.

¹⁸ *Id.* at 405-406

¹⁹ DTE Energy PIPP Program Report, January 29, 2025; Consumers Energy Company's Percentage of Income Payment Plan Pilot Program Report, May 1, 2025.

than needed for customers at the high end of the income eligibility range and not nearly enough for customers at the low end.²⁰ As Roger Colton testified in 2020:

One primary advantage of the PIPP is that it provides that amount of assistance, but only that amount of assistance, needed to render a low-income bill affordable. Unlike the RIA and the proposed LIAC which both, as I discuss above, pay “too much” in many instances and pay “too little” in many instances, the PIPP is narrowly targeted so that the expenditure of funds on bill assistance is appropriately geared toward generating the objective (improved ability-to-collect) sought through the program.²¹

Both pilots included arrearage forgiveness, which can relieve customers of a significant barrier to long-term energy and financial stability. Additionally, the pilots did not require customers to be in crisis with approved SER payments to enroll, which meant that customers with low incomes could begin making affordable monthly payments before excessive energy burdens drive them to the brink of shut-off. Finally, both pilots included some level of energy waste reduction (EWR) support to help decrease consumption by increasing efficiency rather than through self-deprivation of needed electricity.

IV. Problems common to both pilots

The main problem with both pilots is that they did not sufficiently control for or even collect data on the myriad variables that likely impact their chosen outcome measures. As a result, both companies’ reports draw conclusions and make recommendations based on incomplete and potentially incorrect assessment of what their pilots actually achieved. For example:

- In its analysis of on-time payment behavior, Consumers recognized that differences in program design and population could be responsible for the difference in results it observed

²⁰ See Colton Testimony recommending tiered LIA credits in U-21534 and U-21585. Case No. U-21534, Direct Testimony of Roger Colton, 6 Tr 3892-93; Case No. U-21585, Direct Testimony of Roger Colton, 5 Tr 3075-76.

²¹ Case No. U-20697, Direct Testimony of Roger Colton, 8 Tr 3785.

across programs: “Three potential causes for the difference in the data could be: the date ranges were different time periods for CARE MB versus the other APPs; data span for CARE MB was for 12 months, while PIPP and CARE pre-plan data ranges were 15 months; and the volatility of the small pilot size based on the limited funding. Additionally, CARE MB also had different eligibility criteria.”²²

- DTE noted that consumption increased slightly in the first year of enrollment in its PSP pilot, then decreased to below pre-enrollment levels in the second year. While consumption in the LSP followed the same overall pattern, consumption the second year of the LSP remained higher than pre-enrollment levels. For the PSP control group and non-low-income customers, consumption decreased each successive year. DTE speculated that, at least for the year two decreases, “seasonal conditions could be the explanation.”²³ But DTE’s report contains no information about weather conditions over the length of the pilot and does not present weather normalized consumption data. Nor does Consumers’, although Consumers did note that “winter weather temperatures in 2023 and 2024 were above average, resulting in less consumption and program spend” than expected.²⁴
- Only 2% of DTE’s PSP participants were seniors, while seniors make up 11% of its LSPM program.²⁵ It is unclear how pilot design and recruitment choices impacted enrollment demographics, and it is unclear how different demographics impacted pilot outcomes and comparisons to other assistance programs; DTE’s report did not address these issues. Consumers also observed age differences across programs, with most of its PIPP enrollees

²² Consumers Report, p 52.

²³ DTE Report, p 63.

²⁴ Consumers Report, p 59.

²⁵ DTE Report, p 57.

being in the 55-65 range while its CARE program skewed younger with most participants in the 35-44 age group.²⁶

- DTE lost 79% of PSP enrollees before the pilot ended,²⁷ resulting in a sample size too small to support the broad conclusions DTE draws in its report. Of the participants who did not complete the PSP, DTE reported that 11% requested to withdraw, but DTE did not capture the reasons for the requests.²⁸
- DTE used a control group of just 240 people, barely more than one-tenth the size of the original 2,141 PSP participant group.²⁹
- DTE observed that on-time payment behavior for PSP participants was 89% in the 12 months preceding enrollment, increased to 91% during year one, and dropped below pre-enrollment levels to 74% in year two.³⁰ LSP participants followed a similar pattern, but had lower pre-enrollment levels and less of a drop in year two. On-time payments for the control group started at 87%, dropped to 74% in the first year of the PSP, and dropped to 68% in year two. Non-low-income customers maintained steady on-time payment rates of 90-91% for all three years. DTE guessed at possible reasons for these observations but could not really explain them.³¹
- Both companies conducted their pilots as COVID-19 pandemic relief programs, including rental assistance,³² were winding down. Both pilots also took place during a period of rising

²⁶ Consumers Report, p 52.

²⁷ DTE Report, p 57-59.

²⁸ DTE Report, p 59.

²⁹ DTE Report, p 25.

³⁰ DTE Report, pp 60-61.

³¹ DTE Report, p 59-61.

³² Michigan stopped taking COVID rental assistance applications at the end of June 2022, and assistance ended June 2024. See <https://michiganadvance.com/2024/05/11/covid-era-funding-thats-prevented-thousands-of-evictions-is-set-to-expire-what-happens-next/>).

inflation.³³ It is unclear to what extent the outcomes from the pilots and other assistance programs reflect their design elements as opposed to changing economic conditions.

A second problem with the pilots is that they provided inadequate EWR support. In approving Consumers' pilot, the Commission found that customers should not be required participate in EWR as a condition of participating in the PIPP but "wherever practicable, Consumers should automatically refer PIPP participants, upon enrollment, to the company's EWR program servicers to do an assessment on each participant's needs and recommend appropriate EWR services."³⁴ Consumers reported that, out of 722 PIPP enrollees, 214 participated in EWR services, or about 30% of total enrollees.³⁵ DTE reported that, out of 2,141 PSP enrollees, just 700 were contacted for EWR services, or about 33% of total enrollees, and DTE conducted only 70 EWR assessments, reaching about 3.3% of total enrollees or 10% of those who were contacted.³⁶ Both utilities could do better. One-stop shop processing and a single point of contact for both low-income assistance and EWR services could maximize benefits to customers and help reduce consumption.

Another significant problem is that the pilot reports measure success primarily based on participants' payment behaviors and disconnection rates after they are no longer receiving assistance.³⁷ The main question the pilots should answer is whether payment behaviors and disconnection rates improve when customers' electric bills are affordable to them – not what happens after customers' energy burdens return to excessive levels.

³³ See Case No. U-21585, Direct Testimony of Roger Colton, 5 Tr 3043-3050 (detailing the impacts of inflation on people with low incomes).

³⁴ Case No. U-21021, Order, February 10, 2022, p 4.

³⁵ Consumers Report, pp 48, 56.

³⁶ DTE Report, pp 20, 25.

³⁷ Both pilots only compared disconnect rates after program default or program graduation. See Consumers Report, p 54; DTE Report, p 62.

Another problem both pilot reports share is their lopsided cost calculations. Both Consumers and DTE calculated pilot costs by adding forgiven arrearage amounts and the gap between the income-based payment amounts and what participants would have otherwise been billed. The reports present no data reflecting savings from reduced working capital expenses, reduced collection activity expenses, reduced uncollectible expenses, improved customer retention, or other benefits to the companies. The companies' cost calculations also appear to presume that 100% of the forgiven arrearages would have otherwise been collected, which is unlikely. The reports presented no data to indicate how much of those arrearages would have been written off or sold for pennies on the dollar to debt collectors instead of being collected from customers.

Finally, the pilots and corresponding reports appear to presume a two-year program limit when PIPPs should be ongoing for as long as necessary to keep rates affordable for customers. The reports also appear to presume that enrollment must be capped, as it has been for existing programs like the LIA credit, but all customers should have affordable rates.

V. DTE PSP issues

The most glaring problem with DTE's PSP is that it based its payment amounts on an excessive 10% total energy burden. Payments were set at 6% of income for a single commodity or 10% for both gas and electric.³⁸ There is ample evidence in rate case records going back at least five years demonstrating that an affordable energy burden is one that does not exceed 6% of income.³⁹ PIPPs and other low-income assistance programs in other states, including California,

³⁸ DTE Report, p 18.

³⁹ See, e.g., Case No. U-21585, Direct Testimony of Roger Colton, 5 Tr 3054-56; Case No. U-20697, Direct Testimony of Roger Colton, 8 Tr 3689; Case No. U-21534, Direct Testimony of Roger Colton, 6 Tr 3872-3876; Case No. U-20561, Direct Testimony of Roger Colton, 9 Tr 3648.

Colorado, Connecticut, Illinois, New Hampshire, New Jersey, New York, Pennsylvania, and Washington, cap payments at a 6% total energy burden or lower.⁴⁰ DTE has presented no evidence to indicate that a 10% energy burden is affordable or otherwise reasonable.

The decision to cap payments at a 10% total energy burden, along with other pilot design choices like a low arrearage cap of \$1,500 and the inclusion of households between 150% and 200%, resulted in DTE's average cost per enrollee skewing lower than it might for a better designed program. A higher energy burden cap, as well as the inclusion of higher-income households, means less of a gap between participants' income-based payments and what they would have otherwise been billed – lower income customers are not getting enough relief from high bills. A lower arrearage cap means less arrearage forgiveness – again, that means insufficient relief. Reducing program costs at the expense of real affordability is not success.

DTE also lost far too many PSP participants⁴¹ to its one-year income revalidation requirement. It appears DTE may have followed Ohio's lead in imposing this requirement, but there is a key difference between the PSP and Ohio's PIPP program – Ohio's PIPP program is ongoing, not limited to a two-year term. No income revalidation should have been required for a two-year pilot program. DTE's experience, however, offers a learning opportunity by illustrating the critical importance of removing barriers to income revalidation if income revalidation is to be required for a future program. Enrollment for DTE's PSP was online-only, with no paper or phone applications available, and the income revalidation process was the same as the original enrollment process. While DTE says it offered support for customers with technological barriers, the lack of

⁴⁰ See Consumers Report, p 17; Case No. U-20561, Direct Testimony of Roger Colton, 9 Tr 3648-49; Case No. U-21585, Direct Testimony of Roger Colton, 5 Tr 3054-3055.

⁴¹ 34%, to be exact. DTE Report, p 58.

alternative methods for revalidating income may have contributed to the PSP's loss of so many participants.

DTE limited PSP participation to customers with annual consumption at or below \$3,750, which works out to approximately \$300 per month. Rather than exclude relatively higher-consumption customers from participating in the PSP, the better solution would be to enroll them, then identify and prioritize them for receipt of EWR services to help reduce their consumption.

DTE offered a bonus credit to customers who made 11 consecutive full, timely payments, relieving them of their obligation to make a payment in the 12th month. While we are reluctant to discourage what is likely a welcome benefit to customers who may need it, DTE should prioritize providing essentials like payments based on a 6% total energy burden and extend the provision of income-based payments to as many customers as possible before adding enhancements. Such enhancements also inject variables into the program that may influence participation or behavior, which undermine the opportunity to draw conclusions from the pilot study.

DTE concluded its report by recommending full implementation of its PSP, to be funded by the reallocation of funds for its RIA credit and LSP programs, which would be terminated. DTE recommended maintaining the LIA credit as stand-alone program. DTE proposed using partner agencies to administer the PSP and transitioning to the new low-income assistance program structure over two years.

While we are not opposed in principle to redirecting funding away from less effective programs toward more effective programs, DTE's PSP needs considerably more work before terminating the RIA and LSP. DTE needs to demonstrate that its proposed new low-income program structure would serve at least as many customers – preferably many more – as its current structure and that the new structure would provide real affordability. DTE also needs to present a

detailed transition plan to ensure that no customers who are currently receiving assistance get left behind. While we support the use of partner agencies to administer PSP enrollment, transitioning from in-house to third-party administration will require extra care.

VI. Consumers PIPP issues

Consumers' PIPP surpassed DTE's PSP in several ways – it capped payments at 6% of total energy burden and had a much higher arrearage cap of \$6,000, with no consumption cap or annual income revalidation requirement. Of course, these elements increased program costs relative to DTE's PSP and other low-income assistance programs. So did the fact that most of Consumers' PIPP participants fell into the 25-75% FPL tier, which makes for a larger gap between their income-based payments and what they would otherwise have been billed.

Unfortunately, Consumers wrongly concludes that its PIPP is not worth the cost and that it can achieve outcomes nearly comparable with its APP, the CARE program. In reaching that conclusion, Consumers missed two key points. First and foremost is that, as Roger Colton has explained, a PIPP “provides that amount of assistance, but only that amount of assistance, needed to render a low-income bill affordable.”⁴² The CARE program is a good program, and it was innovative when Consumers first proposed it in 2013.⁴³ But its payments are based on tiers – 25-75%, 76-110%, and 111-150% FPL – which means that participants with incomes at the top end of each range will receive a greater proportion of energy burden relief than those at the low end. A PIPP payment is tailored to each participant's income such that each participant receives the same proportion of energy burden relief. With an appropriate cap like Consumers' 6% total energy burden, this effectively ensures affordability for each participant, and affordability to the customer

⁴² Case No. U-20697, Direct Testimony of Roger Colton, 8 Tr 3785.

⁴³ Case No. U-17493.

is key. Second, as previously discussed, Consumers' cost calculation does not account for savings from benefits to the company or the fact that not all forgiven arrearages would be collected absent the PIPP, so it is likely inflated.

VII. Recommendations

Real, meaningful relief for low-income customers is long overdue. The Commission has approved rate increase after rate increase for Consumers and DTE over the past 10 years, with Consumers' electric rate base increasing by about \$5.7 billion and DTE Electric's rate base increasing by more than \$8 billion during that time. Meanwhile, the low-income assistance landscape has remained virtually unchanged, with action on most proposals for improvements delayed year after year for further study. Despite the flaws in the PIPP pilots and analyses of their outcomes, we urge the Commission to take prompt action to support the full implementation of PIPP programs that will ensure affordable monthly payments for Michigan ratepayers.

Specifically, we recommend the Commission take the following steps:

1. Require Consumers and DTE to present in their next rate cases or in special contested case dockets – not *ex parte* proceedings – proposals for the full implementation of PIPP programs with the following attributes by the end of 2026:
 - Payments capped at no more than 6% of total energy burden;
 - No arrearage or consumption caps;
 - No limit on duration; and
 - Automatic referral for EWR services
2. To the extent that Consumers and DTE propose reallocating funding from or terminating existing programs, require the companies to present detailed transition plans with their PIPP proposals to ensure that no participants in existing programs lose needed assistance.

3. Require Consumers and DTE to present projected costs that reflect expected savings from benefits to the companies (e.g., reduced working capital, uncollectibles, and collection activity expenses) and the amount of arrearages that would be written off or sold for less than their full value to debt collectors if not forgiven.
4. Consider directing Consumers and DTE to use third-party program evaluators to design and measure PIPP program outcomes and file reports in public dockets.
5. Consider hiring a third-party expert to design a statewide low-income assistance program that reflects best practices.
6. Provide an opportunity for public comment on the Staff report regarding the work of the EAAC and its AAA subcommittee anticipated in August 2025 in Case No. U-20757.

VIII. Conclusion

The signatories to these comments appreciate the opportunity to share their perspectives and recommendations. We look forward to continuing to work with the Commission, Staff, companies, and other interested parties on the development and implementation of programs that result in rates that are affordable to the companies' low-income customers.

Question:

1. In Case No. U-21021, the Company filed the “Percent of Income Payment Plan Pilot Program Report.”¹ The Company ultimately concluded that the Percent of Income Payment Plan (PIPP) would be too costly to maintain and recommended “continuing with existing MEAP and its current APP, CARE MB”²
 - a. Refer to the CARE MB table on page 197 of the report. The “Average Energy Burden (%) during active enrollment (bill with assistance applied)”³ is left blank. What is the estimated average energy burden for customers on the CARE MB Program?
 - b. Please provide high-resolution images for the “Explanations” and “PIPP Survey Raw Data” tables in Appendix K on pages 200–201.
 - c. Please state how many customers are currently enrolled in CARE MB.
 - d. Refer to pages 79–80 where the Company states that “the average cost for a PIPP customer was nearly \$2,366 more than that of a CARE MB customer during that timeframe.”⁴ Please provide the calculations and data points used by the Company to determine this cost difference.
 - e. Refer to page 80 of the report where the Company states, “The overarching impression is that PIPP performance metrics measure very similarly to CARE and CARE MB, but at an unsustainable cost.”⁵ Please define “unsustainable” and provide any analysis you have done that shows that the PIPP program meets your definition of unsustainable.
 - f. According to recent Pulse Survey data, 51% of households earning less than \$50,000 per year report foregoing basic necessities for at least a month each year to be able to afford energy bills and prevent shutoffs.⁶ Did the company conduct any analysis of how many customers enrolled in CARE Flat Rate and CARE MB gave up basic necessities in order to pay their utility bill as compared to how many customers did the same in the PIPP program?

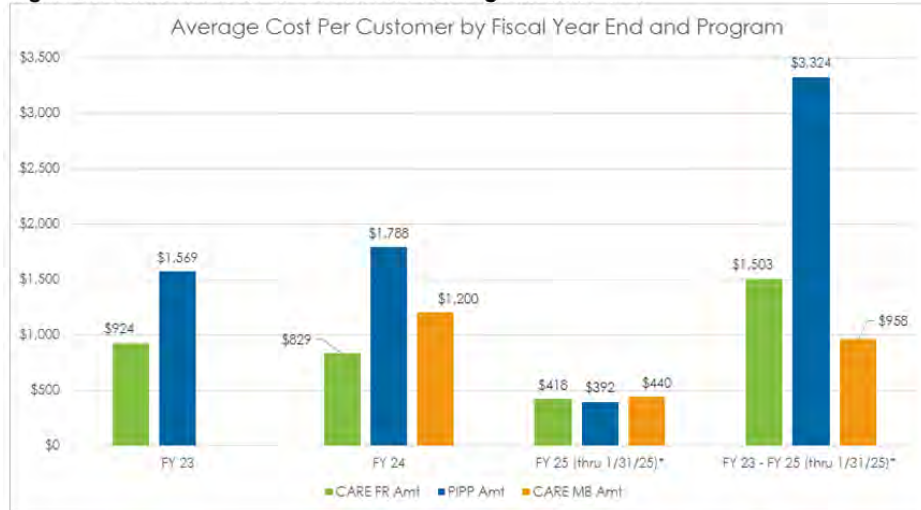
Response:

- a. The average energy burden for Care Modified Budget was marked as not applicable, as the calculation requires both income and household size. These data points were provided by partner agencies for PIPP but were not available for Modified Budget at the time of the request.
- b. Please see attached files U21870-UCC-CE-0685_ATT_1 and U21870-UCC-CE-0685_ATT_2.
- c. As of 9/15/2025, 2,904 customers are currently enrolled in CARE MB.
- d. The Company included the data below in the Percent of Income Payment Plan Pilot Program Report:

Figure 27: Annual Cost Per Customer Enrolled Per Program

	CARE	CARE MB	PIPP	LIA	RIA
Annual Cost Per Customer Enrolled Per Program	Electric - \$950 Gas - \$358 Combo - \$882 Overall Avg - \$829	Electric - \$941 Gas - \$576 Combo - \$1478 Overall Avg - \$1,200	Electric - \$1801 Gas - \$612 Combo - \$1856 Overall Avg - \$1,788	Electric - \$360 Gas - \$363 Combo - \$723	Electric - \$96 Gas - \$180 Combo - \$276

Figure 28: Annual Cost Per Customer Per Program Multi Year



For payment programs such as CARE, CARE MB, and PIPP, the calculation is based on the arrears and gap payment amounts. The arrears that are carried into the program are divided into equal monthly payments that span over 24 months and forgiven with a payment made by the agency. The gap payment is the accumulated cost between the invoiced amount and the monthly payment plan amount for the customer. The design of PIPP allows for a smaller customer payment amount that is based on the percentage of income. For that reason, the customer payment is lower resulting in a higher gap payment, which is an influential factor in the overall cost of the program.

- e. The term unsustainable was used to describe the unacceptable impact on all customers if the PIPP program were expanded to serve the estimated 450,000 low-income customers. Scaling the program beyond those currently enrolled would cost an estimated \$805M annually (pg. 79 of the Company’s Percentage of Income Payment Plan Pilot Program Report), placing a significant financial burden on the broader customer base. As inflation and energy costs rise, the Company reaffirmed its position that a full-scale rollout is financially unsustainable.
- f. The Company did not analyze whether customers enrolled in CARE Flat and CARE MB sacrificed basic necessities to pay their energy bills, compared to those in the PIPP program. Similar studies could be referenced in the ALICE report.

Witness: Jessica R. Byrom

Date: September 19, 2025

STATE OF MICHIGAN
DEPARTMENT OF ATTORNEY GENERAL



P.O. Box 30755
LANSING, MICHIGAN 48909

DANA NESSEL
ATTORNEY GENERAL

June 12, 2025

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

Dear Ms. Felice:

Re: MPSC Case No. U-20929 & U-21021 – *Applications of DTE Gas Company, DTE Electric Company and Consumer Energy Company for approval of PIP Pilot Program.*

In its May 8, 2020 order in Case No. U-20561, the Commission directed DTE Electric Company and DTE Gas Company (hereinafter, collectively DTE) to work with stakeholders and the Commission Staff to develop and propose a low-income customer assistance pilot separate from the companies' existing low-income programs. In its November 18, 2020 application in case no. U-20929, DTE proposed a "Payment Stability Plan" (PSP) pilot to assist low-income customers, i.e., those with incomes at or below 200% of the federal poverty level and who have total arrearages with DTE Gas, DTE Electric, or both companies at or below \$1,500 and annual gas and/or electric consumption less than or equal to \$3,750. The PSP pilot would limit bills to 6% of the customer's gross income in the past year for single commodity customers and 10% for combination customers. The PSP pilot would create a fixed maximum bill for participating customers based on their income, rather than providing a fixed credit amount on a variable bill like those provided by the incumbent residential income assistance (RIA) or low-income assistance (LIA) programs. The PSP pilot would also provide participating customers with energy reduction education and services through the companies' energy waste reduction programs. The Commission approved DTE's application in its order dated April 21, 2021. DTE conducted its two-year pilot starting in 2022 and concluding in June of 2024. It filed a report to MPSC staff on January 29, 2025.

In the approved settlement agreement dated September 10, 2020 in case no. U-20650, a Consumers Energy gas rate proceeding, the parties agreed that Consumers Energy “...will explore the structure of a low-income percentage-of-income pilot (“PIP”) with the assistance of Staff and interested stakeholders and develop an *ex parte* case within six months of the Commission order approving the settlement agreement. This *ex parte* case should include, but is not limited to, a proposal for customers at and below 150% of the Federal Poverty Level (“FPL”) to pay no more than 6% of their household income for gas and/or combined gas and electric services, means of financing the pilot, quantity of enrolled customers, means of choosing eligible customers and means of verifying household income.”¹ Consumers proposed its PIP program design in an application dated March 9, 2021 in docket no. U-21021, subsequently revised and resubmitted on December 31, 2021. The revised proposal required 3% of household income payments for single-commodity customers and 6% for combination customers, with a minimum monthly payment of \$10. The Commission approved Consumers’ pilot on February 10, 2022. Consumers conducted its pilot from October 2022 through January 2025 and filed a report to MPSC Staff on May 1, 2025.

In its order issued on May 15, 2025, the Commission requested comments from interested parties in response to the pilot reports filed by DTE and Consumers Energy in docket nos. U-20929 and U-21021, respectively, concerning outcomes of their Percentage of Income Payment (PIP) programs. According to the order the initial comments should be filed in this docket no later than 5:00 p.m. (Eastern time) on June 12, 2025.

The Attorney General and Citizens Utility Board (CUB) of Michigan appreciate the opportunity to provide comments on this docket. They have reviewed the pilot reports submitted by Consumers Energy and DTE, as well as other submissions in their respective dockets. In their comments provided in this letter, they will focus on the major issues of concern aimed at improving affordability and predictability of energy costs for utility customers in Michigan. The comments address both pilots in one document to afford easier comparison between design and outcomes of the two programs. Accordingly, the comments do not rigorously follow the order of either report but address the key outcomes that PIPs should seek to create. Not every issue or recommendation raised by Consumers Energy and DTE will be addressed. Instead, the Attorney General and CUB will focus their comments on those issues of major concern. The absence of a discussion of other matters should not be taken as an indication that the Attorney General and CUB agree with those matters.

¹ September 10, 2020 order, case no, 20650.

Overview

PIP programs are intended to help Low and Moderate Income (LMI) utility customers keep energy bills affordable and predictable. They have proven to be popular and effective as offered by utilities in several other states. Traditional assistance programs offer fixed amounts of assistance to all customers regardless of their household income or offer the same level of assistance to customers within the same broad Federal Poverty Level (FPL) ranges. Thus, a customer with household income of 25% of FPL may receive no more assistance than a customer at 50% of FPL, despite obviously having different levels of need. PIPs address affordability by requiring all customers to pay the same percentage of their household income after other assistance is taken into account. PIPs provide predictability by requiring the same payment every month, regardless of actual usage, with adjustments only when re-certification procedures identify a change in household income.

We provide this overview to emphasize that PIP programs have only four summative outcomes: to make energy more affordable, to make bills more predictable, to reduce arrearage balances and to serve more customers than traditional assistance programs. The reports filed by DTE and Consumers Energy discuss several additional metrics that may be useful in program design but are not outcomes that should be central to evaluation of the PIPs. Some of the other factors discussed are formative: customer satisfaction and program retention/graduation rates help identify whether customers feel their summative outcomes are being met.

Other factors discussed in the two reports, while interesting to contemplate, do not directly measure the summative outcomes and/or are impacted by exogenous variables that make impact of the PIP program difficult to isolate. For example, changes in energy use before and during PIP enrollment may be impacted by reducing participants' out-of-pocket costs or by provision of energy waste reduction services through PIP but are also impacted by weather. It is not obvious, either, what directional change in energy use should be seen as desirable: it may be better for some low-income households to increase their energy use to improve household health and safety, and doing so will be facilitated by knowledge that their bills will not rise. Both pilot reports also compare default and disconnection rates of PIPs versus other assistance programs, which rates are impacted by several exogenous variables including income fluctuations, unexpected and unavoidable household costs, lack of cash reserves or access to credit. PIPs should not be evaluated for falling short of outcomes they are not intended directly to create and on which they have very limited impact.

If the summative outcomes sought include making household energy costs more affordable and more predictable for more people, the inescapable question is what level of outcome is affordable. Unfortunately, neither DTE's nor Consumers' pilots were designed to answer this central question; rather, they focused on comparisons to incumbent assistance programs. DTE set its target at 10% of household income for combined electric and gas customers, while Consumers chose a 6% level for its combined customers. The American Council for Energy-Efficient Economy (ACEEE), and many other advocates, consider 6% to be a high burden, and 10% or more to be a severe burden. Below, we discuss the results of the two pilots with reference to the difference in energy burdens but do so cautiously because other elements of their pilots, though largely similar, were different enough to limit robustness of direct comparisons. Nonetheless, we compare them below and identify useful indicators that should inform future program developments.

In weighing the future of PIPs in Michigan, the Commission should remain keenly mindful of why PIPS are needed. Energy burdens in Michigan are among the highest in the country and are poised to rise even higher as utilities invest to improve reliability and adjust to the transition to clean energy sources. Energy assistance programs currently serve only a small sliver of eligible populations. While we can and should critique the effectiveness of assistance programs, we cannot realistically expect them ever to serve most customers who need help. The only real solution is affordable rates, and PIPs function more like affordable rates than like assistance programs. They should not be directly compared to assistance programs any more than pain relief should be compared to life-saving surgery. A PIP is successful if it spends more money than existing programs because that means it is providing more-affordable rates to more customers. Viewing PIP as less effective than incumbent assistance programs if it costs more per capita flips this essential point on its head; conversely, viewing PIP as more effective than incumbent programs because it might reduce the number of customers eligible for help also misses the point.

Affordability

DTE's pilot set the PIP payment at 10% of household income for combined customers, widely regarded as a severe energy burden. Gas- or electric-only customers were required to pay 6% of household income. While we could debate at length whether a 10% energy burden is affordable for any low- or moderate-income household, what we can say with certainty is that it was not more affordable for most customers than DTE's incumbent assistance programs. The only PIP participants who usually had lower energy costs with PIP than what they paid pre-PIP were those earning below 75% of FPL. Most participants above 75% of FPL paid

more, in many cases much more, while enrolled in PIP than they had previously paid.

	20-75%			76-110%			111-150%			150-200%		
	Combo	Electric	Gas	Combo	Electric	Gas	Combo	Electric	Gas	Combo	Electric	Gas
Saved by the customer 12 months in PSP in comparison with past assistance	22%	38%	-13%	-2%	10%	-47%	-41%	-10%	-108%	-66%	-27%	-128%
FPL average	78%			107%			142%			165%		

Note: negative savings indicate that participants paid more under PSP than they had pre-PSP. For example, -108% indicates that participants paid 108% more during the pilot than they did before the pilot.

The conclusion that a 10% energy burden does not improve affordability compared to DTE’s incumbent assistance programs is inescapable. It is little wonder that so few DTE customers stayed with the pilot for its full two-year run, which we discuss further below.

At 6% of household income, Consumer’s pilot was much more effective at reducing energy burdens, ranging from 45% to 83% reduction compared to pre-pilot burdens across all FPL tiers and services.

	20-75%			76-110%			111-150%		
	Combo	Electric	Gas	Combo	Electric	Gas only	Combo	Electric	Gas
Saved by the customer 12 months in PSP in comparison with past assistance	77%	83%	74%	66%	74%	57%	55%	67%	45%
FPL average	80%			73%			64%		

Not surprisingly, Consumers reported very low withdrawal rates and very high customer satisfaction rates, also discussed below.

Direct comparisons between the DTE and Consumers pilots are hampered by differences in baselines and program designs. The figures above compare participant costs before and during the PIP pilots; because the two companies’ incumbent assistance programs, which served many participants before PIP, are different, outcomes were based on different baseline conditions. We can say that most participants in DTE’s PSP paid more than they had paid before they enrolled, suggesting they might have been better off not switching to PSP; whereas Consumers’ PIP participants were almost all made better off by switching. It is possible, though, that these differences in outcomes between the two pilots are partly attributable to differences in the two utilities’ incumbent programs and not wholly to differences in their PIP pilot designs. The simple analogy is that we cannot unambiguously judge the outcome of a race with multiple starting lines.

We note other differences in program designs and effectiveness that may have impacted savings, including eligibility standards and the impact of EWR offerings on costs. We do not assess these differences to be big enough to contribute meaningfully to the differing affordability outcomes.

Overall, the stark differences in affordability changes between the DTE and Consumers pilots strongly indicate that an energy burden of 6% of household income improves affordability significantly while a 10% PIP target increases energy burdens for most households, compared to pre-pilot levels.

Participation

Serving more eligible customers, as noted above, is an enormous challenge for ratepayer assistance programs. The PIP pilots did not appear to be inherently easier for customers to learn about, qualify for and enroll in than incumbent assistance programs.

However, “graduation” rates – the percentage of customers who stuck with the pilots for their full two-year run – were starkly different between the DTE and Consumers pilots. Our analysis indicates that DTE’s requirement that participants re-verify eligibility after one year contributed greatly to its much higher defection rate. ~30% of DTE’s participants did not respond to the income re-verification request after one year and were consequently disqualified from continued participation. Even the lowest-income participants who, as discussed above, were the only income tier to realize improved affordability in DTE’s PIP, had low re-verification rates. This fact suggests that low or negative savings realized by participants were not the only reason they left the program, and that re-verification contributed to additional defections.

In addition, a substantial number of DTE PSP participants defaulted and left the program because they failed to pay their bills reliably. This outcome is intuitively obvious: most PSP participants were expected to pay more than they had pre-PSP, and struggled to do so.

By the end of the two-year pilot, only 27% of DTE’s PSP cohort, netting out those who lost income eligibility or moved away, remained with the program for its full two-year run. DTE’s 10% PSP level, along with irksome income re-verification requirements, made the PSP less attractive to customers than alternative programs. They voted with their feet.

Participants in Consumer’s pilot were far more likely to “graduate”. Consumers was successful in offering an easy-to join program that participants liked.

Consumers’ PIP was presented to customers ineligible to other traditional assistance programs. By making it easy to join (74% said it was easy to enroll), to make required payments and to stay in the program, PIP realized a graduation rate (after 24 months) of about 74% excluding participants who moved or lost income

eligibility. This rate was higher than that of the incumbent CARE program adjusted graduation rate of 69% and far better than DTE's adjusted PSP graduation rate of 27%.

Participation in PIP, and the number of people served, would also be enhanced were the concept of "graduation" abandoned. In both DTE and Consumers' pilots, customers were "graduated" after two years regardless of ongoing need or remaining arrearage balance. It is unclear whether "graduation" was conceptualized merely to facilitate close-out of the pilots, or whether it is an intended permanent feature of the programs. If the latter, then we view this feature as substantially contrary to the purposes of the program: the purpose of PIP is not primarily to erase arrearages but to limit current bills to an affordable level. Customers who pay on time for two years and see their entire arrearage balance forgiven still have need to limit their energy burden to a reasonable level. We recommend, instead, that PIP participants remain eligible to participate after their arrearage balances have been erased, and that this milestone is a logical and appropriate moment to re-verify income eligibility.

Arrearage Reduction

In both PIP pilots, arrearage reduction depended on customers making on-time payments and remaining enrolled in the program for two full years. Because Consumers had a much higher participant graduation rate than DTE, its participants also realized greater arrearage reduction compared to DTE's PSP participants and customers enrolled in other Consumers assistance programs.

Consumers' on time payment was around 62% before PIP, rising to 70% after 24 months of PIP. DTE's on-time payment rates were around 87% before PSP and decreased to 73% under the PSP. As noted above, most PSP participants were required to pay DTE more each month than they had prior to enrolling, thus it is no surprise that on-time payment rates dropped; nor, conversely, is it surprising that Consumers' on-time payment rate improved when PIP participants' monthly required payment amounts dropped. Although on-time payment rates under the two pilots were similar, cumulative arrearage reduction under DTE's PSP was smaller because so many participants left the program and received no further arrearage reduction credits.

While arrearage reduction is important to participants, it is a consequence of affordable energy burdens and easiness to stay enrolled, not an independent outcome. That is, because Consumers PIPP customers were required to pay only 6% of household income toward energy costs, they were better able to make on time payments compared to DTE PSP participants whose energy burden was 10%.

These observations also point to another common but unrealistic program feature of the two pilots: participants qualify for incremental reductions in their arrearage balances when they paid their bills on time. This feature has intuitive appeal that nevertheless fails to recognize that arrearage forgiveness provides too little incentive to overcome the real reasons that low-income customers pay their bills late. Late payments occur when customers earn less money in a month than usual, incur unexpected and unavoidable expenses, and have no savings to dip into or credit lines to draw on to make up the difference. Providing arrearage forgiveness for metronomically on-time monthly payments assumes that low-income people have the money but forget to pay their bills; or that they need a stronger incentive to work hard and increase their earnings; or that they can scrimp on other necessities in order to pay their utility bills instead. All these assumptions are paternalistic and erroneous. Arrearage forgiveness is, all the same, an important element of PIP's value proposition. We simply argue that it should not depend on realities of their lives over which low-income people have limited control. We suggest, rather, that arrearage forgiveness should continue with limited forbearance for late payments, provided the participants catch up on those payments within a reasonable period. Applying the same logic, late payment fees should not be assessed to PIP participants provided they catch up within one billing cycle.

Predictability

A central value proposition of PIP asserts that consistency of monthly energy costs will create predictability and ease financial stress on low-income customers. On the one hand, it is a truism that charging customers the same amount every month creates better predictability than bills that vary from month to month, and it would be simple to declare that the pilots accomplished this objective.

The DTE and Consumers pilot reports discuss several other outcomes that may be impacted by predictable bills, but are also influenced by other, likely more important factors. As noted above, both companies reported that 70%-73% of pilot participants paid on time, but the rate was higher for Consumers customers compared to pre-PIP rates and lower for DTE customers. It is possible that predictable monthly bills helped some customers to pay more reliably on time, but considering the differing before-and-after on-time payment trends observed between the two pilots, the better explanation is likely to be directionally different changes in the monthly required payment amounts.

While changes in late payment rates may provide useful information about the viability of different required payment levels, it is unlikely that the PIP pilots had, or should be expected to have had, significant impacts on late-payment rates. Other

factors, unrelated to PIP and the utility-customer relationship, likely have much greater impact:

- Income instability - Many low-income households experience fluctuating wages, making it difficult to consistently pay utility bills.
- Financial setbacks – low-income customers have limited or no savings to buffer them during difficult times. When they incur an unexpected cost (health, car or home repair, or even rising cost of living, etc.) they cannot cover all the current bills and must defer paying something, which might often be the utility bill.
- Limited access to credit and banking services – low-income customers may not have credit cards and thus cannot “float” a payment before having the cash on hand. They may be unbanked or may have little or no savings, which makes paying bills harder.

Defaults and disconnections may follow late payments when customers lack awareness of assistance programs. Customers in arrears need to know that assistance is available, that they may be eligible, who to call, be able to understand the offerings and able to complete the application process. We discern no convincing evidence in either DTE or Consumers’ pilot reports that PIP reduced defaults or disconnections compared to pre-PIP services. While both DTE’s and Consumers’ pilot reports give these topics careful analysis and discussion, we view this focus as misplaced. PIPs do not, and probably cannot, address the main causes of defaults and disconnections, and therefore these metrics should not be used to evaluate PIPs.

Because so many powerful exogenous factors impact late payments, defaults and disconnections, PIPs should not be evaluated by these outcomes. The Commission should simply accept that predictable monthly PIP payments create a valuable benefit for low-income customers that is difficult to measure.

To reiterate our main point here: comparing late payment, default and disconnection rates between PIP and incumbent assistance programs tells us little about how effective those programs are, because those outcomes are impacted much more by other events in the lives of low-income customers that have nothing to do with their utility service. The Commission should not reference these outcomes in judging the value of PIP and should simply take it as a given that predictable billing amounts improve the lives of low-income customers.

Energy savings

Similarly, the Commission should put little evaluative emphasis on changes in energy use before and during PIP enrollment, compared to incumbent assistance programs. The central concern here is that capping participants' monthly energy costs through PIP may reduce their incentive to use energy efficiently – since using more will not cause their bill to increase. This incentive may be offset by more-effective provision of energy waste reduction services to PIP participants, but the data available provides no obvious way to disambiguate these two counteracting signals.

Nor should it be uncritically assumed that the objective is to reduce participant energy use. Energy self-deprivation behaviors, which can have significant health and quality-of-life impacts on household members, are well documented among low-income populations who seek to keep their energy burdens to manageable levels. Lacking any evidence that increased energy use among some participants is merely wasteful behavior facilitated by a perverse price signal, we might as well welcome evidence that PIP participants use more energy when their costs are capped.

Here, the Commission should be mindful of its adopted definition of energy affordability: “*The extent to which a household has the resources to meet their home energy needs for heating, cooling and other uses in a healthy, sustainable and energy efficient manner **without compromising a household’s ability to meet other basic needs.***” (emphasis added) By this definition, PIP succeeds if it enhances a household’s ability to meet basic needs, which may include reducing unhealthy or unsafe energy deprivation behaviors.

Finally, as with late payments and defaults, exogenous factors such as differences in weather from year to year may affect energy use more than features of the PIP program, making changes in energy use a very problematic metric for evaluating PIP. To this point, we note that neither DTE nor Consumers quantitatively normalized weather to explain changes in household energy use attributable to their pilots.

General discussion aside, the actual data provided by both DTE and Consumers provide little evidence that their PIP pilots impacted energy use more or less than other low-income programs. For DTE’s PSP there was no significant difference in energy consumption for any subgroup. For Consumers’ PIPP, energy usage increased moderately among electricity- or gas-only customers in some income groups, but not enough to firmly discern statistical significance.

In short, while the Commission should always attend to low-income energy waste reduction outcomes, nothing in the DTE or Consumers pilot reports suggest this is a robust measure of PIP effectiveness or even that it should be.

Program Costs

As briefly discussed above, two of the four summative outcomes of PIPs are to make energy burdens more affordable and to serve more people.

There are three basic ways to reduce low-income customers' household energy costs to 6% of their income, a high but not severe burden. First, we can reduce the rates for all residential customers, which is constrained by cost-of-service rules. Second, low-income customers can use less energy, which is being pursued in various ways. Third, we can provide bigger bill subsidies than we do under incumbent assistance programs. When per-capita PIP costs exceed those of incumbent assistance programs, it indicates PIP is succeeding in limiting more customers' energy burdens: i.e., it is achieving what it was meant to do. Yet, Consumers Energy concludes that PIP was no better than its incumbent assistance programs, and arguably worse, because it had a higher per-capita cost.

Another way for PIP to succeed is to reduce energy burdens for more customers than incumbent assistance programs serve. If PIP would serve fewer people than incumbent assistance programs, it would fail. Yet, DTE has concluded that its PSP was a success in part because it could serve fewer people and incur less cost than the incumbent programs. We argue that these projections indicate that DTE's PSP did not work as intended and should be significantly changed before proceeding.

Company-specific Conclusions

Consumers

Consumers' PIP pilot delivered greater benefits to customers than its incumbent assistance programs. It:

- Reduced customers' energy burdens much more and arranges more;
- Retained the great majority of eligible customers through to "graduation" after two years and reported very high customer satisfaction rates.
- By its very design, provided greater bill predictability than other assistance programs.

Because this was a limited-enrollment pilot, we cannot say whether Consumers' PIP would assist more people than incumbent aid programs. Based on the four summative outcomes we credit to PIPs, we judge Consumers' pilot to have been a

success and recommend the Commission base future program requirements largely on this program design.

Unfortunately, by interpreting its pilot results differently and understating the need for program innovation to better serve low-income customers, Consumers proposes not to offer a PIP program going forward.

Consumers understates the need for more effective assistance by arguing that costs borne by its customers are comparatively low: “Consumers Energy’s total average residential bill is around \$121.91, better than \$122.73 for the Midwest and \$142.65 for the US”² In fact, as the chart accompanying the quoted text makes clearer, these figures are for electric bills only. PIP, though, is concerned with overall energy burden, not the cost of electricity only. When costs of gas used for space and water heating in our comparatively cold climate are included, the energy burden for Michigan residential customers ranks very high nationally. Consumers’ customers need help: they are not better off compared to customers of most other utilities.

Further, Consumer’s current assistance programs show little prospect of providing the needed help to more customers. The pilot report recites a litany of programs and resources intended to help low-income customers.³ What it does not disclose is how few customers benefit from these assistance programs. For example, only about one in six eligible Consumers customers currently receive Residential Income Assistance. The dollar value of residential uncollectibles has risen sharply over the last several years, and the number of Consumers customers in arrears more than 90 days has also skyrocketed. Merely doing more of the same, even assuming incremental improvements are realized year by year, offers little hope of coming anywhere close to serving the identified need.

Consumers needs to do something radically different and creative. We recommend that Consumers reconsider its decision not to offer PIP going forward, as our analysis indicates better outcomes than those achieved by CARE and CARE MB, and a rising need for more effective programs to reduce energy burdens. The ability to deploy more aid to customers who need it is not a flaw of Consumers’ PIP – it is a feature.

² Consumers PIP pilot report, p7.

³ Consumers PIP pilot report, pp. 8-14.

DTE

DTE's PSP pilot, in contrast, was much less successful:

- Most customers did not realize reduced energy burdens.
- A very high percentage of customers did not complete the full two-year program and consequently realized less arrearage reduction than Consumers' PIP participants.

DTE's results strongly indicate to us that a 10% energy burden target fails to improve upon alternative, existing assistance programs, and creates too little financial incentive for participants to stay in the program by paying their bills on time and re-verifying their income. We commend DTE for its willingness to continue offering PSP but strongly recommend that it adopt features of Consumers' PIP, chiefly the 6% energy burden target and less frequent and frictionless income re-verification requirements.

General PIP recommendations

In sum, the two pilots provide important lessons about what works, and doesn't work, in PIP programs. We recommend that the Commission require regulated utilities to offer PIPs including the following features:

- 6% energy burden target for combined-service households and 3% for single-commodity customers.
- 1/24th arrearage balance reduction every month for participants who are no more than 30 days late in making payment.
- Income re-verification only after full arrearage forgiveness has been achieved and every 24 months thereafter.

Comments on Pilot Design

We have noted several ways that the designs of the two PIP pilots limit the ability to arrive at relevant and robust findings. We return to this theme in closing in hopes that these limitations may be addressed in the design of future pilots.

First, it is difficult to arrive at firm conclusions about the appropriate level of required payment (i.e., 6% or 10% for combined customers) because baseline (pre-PIP) conditions of participating customers differed between the two companies. We interpret that the 6% payment requirement for Consumers customers is preferable because they paid less than they had paid before PIP, whereas DTE's 10% payment requirement is less effective because most of its customers experienced an increase in required payment. We cannot firmly say, however, that differences between the incumbent assistance programs, which previously served the PIP participants, did

not contribute to the differences in PIP outcomes. We believe that the evidence favors the conclusion that a 6% required payment is better for customers but acknowledge that ambiguity exists. An experimental design that started with a large sample group of similarly situated customers, established a control group with some and subjected other participants to differing treatments (e.g., 10% or 6% payment levels) would yield less ambiguous results.

Second, the data provided in both pilot reports do not support rigorous and meaningful cost-benefit analysis. We argue above that the increased per-capita assistance costs of Consumers' PIP pilot, compared to its incumbent programs, indicate the pilot successfully directed more assistance to needy customers as intended and not that the pilot was not cost-effective. Our point is not, however, to argue that the pilot was cost-effective compared to alternatives; the data to support such an analysis was not made available. We know how much more was spent to support Consumers PIP customers than they received pre-PIP, but we do not know what benefits that support created. From a utility cost perspective, increased assistance may have averted shutoff, collections and uncollectible costs. These benefits may be difficult to value and problematic to credit to PIP alone, but it is not appropriate to manage only by what can be measured, which in this instance is the marginal cost of PIP versus incumbent assistance programs. In addition, we can only impute most customer costs and benefits, which may be difficult to quantify but are nonetheless important. What are the financial and non-financial benefits to customers of having predictable monthly payments, of reducing late payment fees, of reduced incentives to engage in energy self-deprivation behaviors, of avoided shutoffs and debt-collection processes? These questions are difficult to address quantitatively but they are not imponderable, and future pilot designs for low-income programs should seek to answer them better.

The Attorney General and CUB appreciate the opportunity to provide comments to the Commission in this proceeding and remain ready to assist further through their experts in developing more effective plans for improving energy security of low- and moderate-income customers while minimizing the burden on customer rates.

Sincerely,

Michael E. Moody

Digitally signed by Michael E.

Moody

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Power outages and community health: a narrative review

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Abstract

Purpose of review: Power outages, a common and underappreciated consequence of natural disasters, are increasing in number and severity due to climate change and aging electricity grids. This narrative review synthesizes the literature on power outages and health in communities.

Recent findings: We searched Google Scholar and PubMed for English-language studies with titles or abstracts containing “power outage” or “blackout.” We limited papers to those that explicitly mentioned power outages or blackouts as the exposure of interest for health outcomes among individuals living in the community. We also used the reference list of these studies to identify additional studies. The final sample included 50 articles published between 2004–2020, with 17 (34%) appearing between 2016–2020. Exposure assessment remains basic and inconsistent, with 43 (86%) of studies evaluating single, large-scale power outages. Few studies used spatial and temporal control groups to assess changes in health outcomes attributable to power outages. Recent research linked data from electricity providers on power outages in space and time and included factors such as number of customers affected and duration to estimate exposure.

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Conflict of interest: Joan A. Casey, Mihoka Fukurai, Diana Hernández, Satchit Balsari, and Mathew Kiang declare that they have no conflict of interest.

Human and Animal Rights: All reported studies/experiments with human or animal subjects performed by the authors have been previously published and complied with all applicable ethical standards (including the Helsinki declaration and its amendments, institutional/national research committee standards, and international/national/institutional guidelines).

Summary: The existing literature suggests that power outages have important health consequences ranging from carbon monoxide poisoning, temperature-related illness, gastrointestinal illness, and mortality to all-cause, cardiovascular, respiratory, and renal disease hospitalizations, especially for individuals relying on electricity-dependent medical equipment. Nonetheless the studies are limited and more work is needed to better define and capture the relevant exposures and outcomes. Studies should consider modifying factors such as socioeconomic and other vulnerabilities as well as how community resiliency can minimize the adverse impacts of widespread major power outages.

Keywords

Power outage; blackout; natural disasters; energy insecurity; carbon monoxide poisoning; durable medical equipment

INTRODUCTION

In August 2003, over 50 million Americans and Canadians lost power for up to four days due to a surge of electricity along faulty transmission lines (1). In China, ice-coated transmission lines and towers collapsed during a severe winter storm in 2008, interrupting electric service to 200 million people (2). Meanwhile, hot weather and related air conditioner use triggered a blackout affecting 8 million people in Baku, Azerbaijan in July 2018 (1). The largest blackout in history affected at least 600 million people across India in July 2012 (3). The frequency and severity of these events will increase with population growth and climate change, as infrastructure damage from intense storms and floods, hydropower shortage from droughts, and increased demand as temperatures rise and strain an aging electricity grid (4-6).

Power outages worldwide

Today, South Asia has the highest system average interruption frequency index (SAIFI). The average business there experienced 26 outages per month in 2019 (7). However, even businesses in Organisation for Economic Co-operation and Development (OECD) countries experienced one power outage every other month in 2019. Outages last longest, on average, in Latin America and the Caribbean (8 hours) and Sub-Saharan Africa (7.5 hours), compared to just 2.5 hours in East Asia (8). The United States (U.S.) Energy Information Administration predicts that global electricity production will increase by 75%, from 20 trillion kilowatt-hours (kWh) in 2018 to 45 trillion kWh in 2050, driven in large part by demand in non-OECD countries (9). This increased demand will result in more power outages, with unique economic, social, and health consequences, of which we review that latter.

Causes and costs of U.S. power outages

In the U.S., major power outages increased 10-fold between 1984–2012 with the average household experiencing 470 minutes without power in 2017 (11, 12). Large blackouts, disturbances that interrupt more than 300MW (enough power for ~50,000 homes) or 50,000 customers and require reporting to the U.S. Department of Energy (13), occur more commonly in the winter and summer and year-round during the mid-afternoon (14).

Electromagnetic events and intentional cyber-physical attacks caused >25% of total U.S. power outages between 2000-2016 (Figure 1A) (10, 15). Such attacks present substantial risk to the electricity grid and could result in an outage that stretches for months across wide geographies, especially if timed after a natural disaster (16). Most widespread power outages were caused by severe weather (Figure 1B) and Florida, California, New York, and Michigan were hit hardest with 25.3 million, 22.2 million, 18.3 million, and 12.4 million affected customers, respectively (15).

Outages, particularly those related to weather, are almost always accompanied by intersecting and related phenomena that result in economic, social, and health damages (Figure 2). Economically, they interrupt business, cripple the internet, and halt many forms of transportation (8). The 2003 Northeast Blackout in Canada and the U.S. cost between \$4-10 billion (17), and electricity infrastructure repairs alone cost \$3.5 billion after Hurricane Sandy (18). Social costs include increased crime, motor vehicle crashes, psychosocial stress, and interrupted communication between emergency services, delivery of clean water, and waste removal (3, 12, 19, 20). Although, altruistic acts, including providing assistance to others, donating money, assisting with traffic, may also increase (19-22). Several factors influence the severity of economic, social, and health costs of power outages including outage frequency, duration, timing, and geographic range, as well as mitigation measures, population preparedness, and prior experience (19, 23).

Medically high-risk groups during power outages

Certain subgroups have higher risk of adverse health outcomes during power outages. These include older adults, those reliant on electricity-dependent durable medical equipment (DME, e.g., oxygen concentrators), those unable to evacuate, including nursing home patients, those reliant on others to complete activities of daily living, the heat/cold susceptible, and those with underlying conditions exacerbated by the inciting events, such as respiratory, cardiovascular, and renal disease (23-25). The number of electricity-dependent individuals is anticipated to grow in the coming years (23, 25); numbers already trend upward and rate of DME use appears higher among lower socioeconomic status individuals (26).

Documented disparities in power outage preparedness and exposure

Evidence from the U.S. suggests older adults, poorer families, and individuals of non-Hispanic Black and Hispanic race/ethnicity are least likely to have a three-day supply of food, drinking water, and medication, a preparedness measure for power outages (27-29). In New York City, only 58% of 887 people surveyed were prepared for a disaster; preparedness dipped to 45% among households with income <\$30,000 and to 28% among primary Spanish-speakers (29). Generator cost (\$2-5,000) may price out lower socioeconomic status families and those living in public housing or apartment buildings that prohibit generators (21, 29). Finally, power outages may last longer in lower socioeconomic status or communities of color (30-34), where impacts may already be greater. For example, in Florida after Hurricane Irma, higher income individuals evacuated farther and to destinations with lower power outage rates compared to their lower income counterparts (33). After Hurricane Maria, satellite imagery of Puerto Rico suggested that households with power

restored in Stage 1 earned almost double the income of households with power restored in Stages 2-3 (32). After Hurricane Sandy in New Jersey, non-Hispanic White individuals had the longest duration outages (11.2 days compared to 8.2 days for African Americans) (34). Such disparities put these already-vulnerable groups at increased risk of adverse power outage-related health outcomes.

Goal of this review

This review focuses on blackouts—the unavailability of electric power in an area—and does not address issues of energy poverty, a separate and important predictor of health (35, 36). In addition, we do not cover challenges faced by healthcare facilities during power outages. In this narrative review, we highlight themes in the current scholarship on power outages and community health and identify future avenues for research.

METHODS

We conducted searches via Google Scholar and PubMed in spring 2020 for studies written in English with titles or abstracts containing “power outage” or “blackout.” We limited papers to those that explicitly mentioned power outages or blackouts as the exposure of interest for health outcomes among individuals living in the community. The reference lists of the identified studies were also examined to identify additional relevant articles. We screened the articles to include only original primary research published between January 2004 and June 2020 that explicitly mentioned power outage or blackout as an exposure of interest. The final sample included 50 articles spanning power outage events from 1977 to 2019 (Figure 3). The majority (72%) of the studies evaluated health outcomes in the US, but we collected literature from across the globe (Appendix Figure 1). Non-US articles tended to focus on interrupted healthcare (37, 38), which was outside the scope of this review.

Exposure assessment

Single, large-scale power outages.—Nearly all studies evaluated single, large-scale power outages. While the definition of large-scale varied from study to study, many met the U.S. Department of Energy criteria: 50,000+ customers affected or an unplanned loss of 300 MW (13). Researchers assumed individuals experienced the outage if they lived or attended a healthcare facility in the region where the outage occurred. Most studies relied on pre-post outage temporal comparisons to draw inference (20, 28, 39-53) or only described health outcomes after the outage (54-71) (Figure 4A). Eight studies of single outages also incorporated geographic variability in outage distribution in the study design, in addition to using pre-post outage health measures (72-79).

Multiple power outages.—Seven studies evaluated multiple power outages (30, 80-85), with three using outage frequency to characterize long-term exposure (82, 84, 85). Others conducted longitudinal analyses. In South Africa, Gehringer and colleagues used a combination of government data, Facebook, and the local electric utility’s Twitter handle to track daily load shedding events (halted electricity distribution due to demand exceeding supply), including outage duration (30). Koroglu used standard electricity reliability data from the Maharashtra State Electricity Distribution Company in India to characterize

monthly SAIFI and system average interruption duration indices (SAIDI) values statewide (83). Zhang and colleagues linked power outage records, including total number of customers affected, from the New York State Department of Public Service (NYSPS) between 2001-2013 to the power-operating division-level (~1,700 divisions exist in New York with an average population of ~11,000 people each). They created daily exposure metrics based on proportion of customers affected and duration (in days) of power outages. Likewise, Dominianni et al. used half-hourly NYSPS data to identify outages within each of New York City's (NYC) 66 electricity grid networks (80). They defined the entire grid network area as exposed on a given day if >1,000 people were without power during the warm-season and if >75 people were without power during the cold-season. Different cutpoints were used because fewer people experienced outages during the cold season.

Outcomes

Carbon monoxide poisoning.—Twenty-three (48%) of studies included evaluated carbon monoxide (CO) poisoning (44, 45, 50, 51, 54, 55, 57-62, 64-66, 69-72, 76, 77, 85, 86), a topic previously reviewed (87-89). CO is a colorless, odorless, and tasteless gas, formed by incomplete combustion of carbon compounds. Because hemoglobin binds 250x more readily with CO than with oxygen, prolonged exposure leads to cellular hypoxia, ischemia, and death (90).

In the 23 reviewed articles, indoor use of charcoal and gasoline-powered generators caused the majority of CO poisonings. The most common symptoms of CO poisoning were headache, nausea, vomiting, dizziness, loss of consciousness, and death. The majority of studies identified CO poisoning using medical chart reviews including emergency department (ED) visits (50, 54, 55, 57, 60, 64-66, 69-72, 77), hospitalizations (58, 69-71, 76), and emergency medical service (EMS) and poison control calls (28, 44, 45, 58, 59, 65, 69, 72) coded as CO poisoning-related; several studies used laboratory confirmation or reported serum carboxyhemoglobin (COHb) levels (44, 54, 55, 59-61, 64, 70, 91). Many studies reported fatalities, particularly in the several days following storms (54, 55, 57, 59-62, 65, 69-71, 85). Over 50% of CO poisoning studies reported the use of hyperbaric oxygen therapy (44, 54, 55, 58, 59, 61, 64, 65, 69-72, 91), and higher COHb levels may be related to persistent cognitive and psychiatric changes after CO poisoning (91). In many cases, children (54, 55, 59, 72), older adults (61, 62, 65), immigrants (60, 65), and people of color (55, 60, 64, 65, 70) were disproportionately affected. Qualitative methods can provide key insights not otherwise captured. For example, Styles and colleagues also found that 62% of non-Hispanic White generator/charcoal grill/heater operators reported hearing warnings about CO poisoning in the year prior compared to just 30% of those in other racial/ethnic groups (70) and Van Sickle et al. determined fear of theft was the most common reason to place a generator indoors (71).

While most studies only catalogued CO poisoning events following power outages, a few employed a comparison time period (28, 45, 50, 72, 76, 77), allowing authors to determine if more CO poisoning occurred than expected following power outages. After the Great East Japan Earthquake of 2011, Nakajima and colleagues found 13.5x the odds of CO poisoning among patients in the disaster area (including power outage exposure) from March 11 to

April 9, 2011 compared to the same dates in 2012 (76). A spatial control also revealed higher counts of CO poisoning in the disaster area versus an unexposed region. Johnson-Arbor compared two major storms in Connecticut in 2011 and 2013, where the 2011 storm resulted in 11x the number of individuals losing power and 5x the number of CO poisonings (44).

All-cause, cardiovascular, respiratory, and renal disease healthcare visits.—In general, hospitals see fewer patients in the days leading up to storms (42), whereas more patients arrive during and after outages, often with respiratory, cardiovascular, or renal disease exacerbations (30, 40, 42, 46, 47, 53, 68, 80, 81). In a comprehensive study, Dominianni et al. evaluated three major NYC outages (1999, 2003, 2006) and localized warm- and cold-weather outages within NYC (80). In models accounting for temperature, day of week, and seasonal and long-term trends, they confirmed prior findings of increased cardiovascular and respiratory disease hospitalizations during the 2003 outage and found new evidence of elevated risk of renal disease hospitalizations during warm-season power outages and cardiovascular disease hospitalizations during cold-season power outages. Zhang and colleagues also illustrated the utility of using daily sub-city level power outage data in their study of chronic obstructive pulmonary disease (COPD) hospitalizations statewide. They used power-operating division-level (~11,000 residents per division) between 2001-2013 in New York and found the largest increases in COPD hospitalizations during the first three days after power outages, where 23% of COPD hospitalizations on power outage days could be attributed to the outage itself (81). Compared to non-power outage periods, COPD patients arriving for care during power outages had a higher number of comorbidities and healthcare costs. Interrupted use of nebulizers, and oxygen and bilevel positive airway pressure machines, as well as sensitivity of COPD patients to changing indoor conditions (e.g., lack of air conditioning or dehumidifiers) likely explained the large increase in hospitalizations.

Many acute care visits related to cardiovascular and respiratory disease exacerbation during blackouts appear to result from failure of *electricity-dependent medical devices* (41, 42, 46, 50, 51, 63, 67, 68, 80, 81, 92). For example, after the 2011 Great East Japan Earthquake, 75% of 24 new pediatric inpatients at Tohoku University Hospital relied on DME, including 13 children using ventilators (76). After Hurricane Sandy, ED visits at Beth Israel Medical Center related to respiratory device failure and “power outage” increased in all age groups and peaked the day following the disaster (41).

Older adults and children may be at particular risk during power outages. Unlike many other NYC hospitals in downtown Manhattan, Beth Israel Medical Center remained open after Hurricane Sandy and their electronic health record (EHR) data revealed a 114% increase in ED use among patients aged 80+ and a 11% decline among those aged 18-64 compared to the six-months prior (41). In addition to power outage-related care, this increase reflects spillover from other closed hospitals. In South Africa, Gehringer and colleagues evaluated repeated, daily, temporary outages on pediatric hospital admissions, finding an average treatment effect of 6 additional admissions per day due to any power outage in the two days prior (30). They found the largest effect sizes for respiratory outcomes, burns, and ear, eye,

and gastrointestinal system outcomes in models that controlled for important factors like weather and seasonal and long-term trends.

Gastrointestinal illness.—Power outages can affect food refrigeration and water system supply and disinfection, potentially precipitating gastrointestinal illness as measured via poison control calls, prescription orders, and hospital admissions (30, 45, 48, 78). However, evidence is mixed, with several studies finding no increase in gastrointestinal illness after power outages (72, 78, 86). Marx et al. employed methods from digital epidemiology to evaluate diarrheal illness after the 2003 Northeast Blackout finding that diarrheal syndrome ED visits, antidiarrheal medication sales, electrolyte sales, and worker absenteeism due to gastrointestinal illness all increased above expected in the days following the blackout (48).

Temperature-related illness.—Power outages reduce individuals' ability to control the indoor environment and may coincide with temperature extremes (both heatwaves and winter storms) resulting in illness (40, 42, 51, 53, 55, 68, 77, 80) and disturbed sleep (49) related to heat and cold exposure. Racial, socioeconomic, and age disparities exist in response to extreme temperature exposures, owing to differences including baseline health, access to generators, the urban heat island effect, and occupation (93, 94).

Maternal and neonatal health.—Four studies assessed the relationship between power outages and maternal healthcare utilization, measures of fertility, and birthweight (73, 74, 79, 83). Using monthly power outage data from 2010–2015 in India's Maharashtra state, Koroglu and colleagues evaluated the relationship between SAIFI (system average interruption frequency index) and SAIDI (duration) metrics and use of maternal health services (83). Increased monthly SAIFI but not SAIDI was associated with reduced odds of delivering in a healthcare institution (versus at home), both indices were associated with reduced odds of attendance of birth by skilled professional, and neither were related to caesarean section delivery. Outages may affect a woman's ability to travel to a healthcare facility or reduce her perception of the quality of care she will receive there, encouraging her to stay at home.

Burlando exploited a month-long 2008 blackout that occurred on the island of Zanzibar, Tanzania to study both measures of fertility (counts of live births) and birth weight (73, 74). The outage caused both a transitory negative income shock, with those who used electricity at work reporting a decrease in earnings and hours worked, and individuals to spend more time at home. With data from the island's main maternity hospital (500-900 births per month), Burlando used a difference-in-differences strategy to estimate the effect of the power outage on fertility and birthweight by comparing outcomes among mothers living in shehias (communities) with and without any electrification exposed and unexposed to the blackout at different times during pregnancy. They found that the blackout was associated with a 17% increase in live births (253 additional births) 8-10 months later (73). The outage also appeared to reduce birthweights 7-10 months later, with the strongest associations among the lowest-percentile weights (e.g., 8th-percentile weight was reduced by 2kg) (74).

Mental health and wellbeing.—Qualitative studies identified worry, anxiety, stress, and reduced wellbeing among individuals exposed to power outages, generally tied to concerns

about disrupted heating, food, water supplies, and healthcare (75, 82). In the acute setting, healthcare-seeking for mental health problems may actually decline, as was seen immediately after the 2003 Northeast Blackout in NYC (40). Therefore, alternative data, such as Twitter, may supply valuable information about population health during an outage (20). Li et al. found a sharp drop in Twitter sentiment (i.e., more negative tweets) in the first hour of a NYC power outage in 2019. Other studies have evaluated longer-term effects of power outages (56, 79, 84) In Ghana, University students who experienced power outages 4 times per week had significantly higher levels of anxiety as measured by the generalized anxiety disorder 7-item scale (84). After Hurricane Sandy, ED visits for mental health problems among pregnant women in New York increased gradually and peaked eight months later at a level 33% higher than expected based on data from prior and subsequent years (79).

Mortality.—Three studies identified increased mortality after the 2003 Northeast Blackout in New York City (NYC), which affected 8 million NYC residents (39, 47, 80). Anderson and Bell found increased accidental (+122%) and non-accidental (+25%) mortality controlling for important environmental confounding variables such as temperature, air pollutants, day-of-week, and seasonal and long-term trends (39). Dominianni and colleagues extended Anderson and Bell’s study to span major NYC blackouts in 1999, 2003, and 2006, as well as localized outages in 66 NYC electric-grid networks (80), finding significant associations between localized cold-weather, but not warm-weather, outages and all-cause and non-external mortality. Conversely, Imperato could not identify an effect of the 1977 NYC power outage on all-cause mortality as it coincided with and could not be disentangled from a heatwave (43). Other studies have tied power outage-related mortality to CO poisoning (see prior section), falls (55, 62), fire (55, 62), heat (85), and cold exposure (55).

Other outcomes.—Several studies reported increases in healthcare visits for burns, lacerations, or other injuries (40, 42, 50, 68, 77), but attributing these events to power outages, rather than co-occurring exposures such as housing damage or motor vehicle crashes has been difficult. Further, two studies reported reduced prescription refills during power outages (42, 52) and one found no change (50). After Hurricane Maria power outages lasted months in Puerto Rico and prescription refills did not revert to normal levels even one-year later (52).

REVIEW SUMMARY AND RECOMMENDATIONS

Recent studies point to a relationship between power outages and adverse health outcomes among community residents. Most have assessed single, large-scale power outages without linking events directly to patient residential addresses. New work has used data from electric utilities (80, 81, 83) and social media (30) to more accurately capture the temporal and spatial extent of outages. Consistent evidence from >20 studies across a range of power outages from hurricanes to ice storms to earthquakes finds increased rates of CO poisoning during outages as individuals use alternative fuel sources, such a generators and charcoal. We also observed moderate evidence for an association between power outages and all-cause, cardiovascular, respiratory, and renal disease hospitalizations, except for the subgroup of individuals relying on electricity-dependent medical equipment where associations

consistently pointed to elevated risk. In times and places where power outages corresponded to hot or cold ambient temperatures, we found moderate evidence of a relationship between power outage and temperature-related illness, gastrointestinal illness, and mortality. Recent studies have broadened their scope to consider additional outcomes such as mental health (19), maternal and child health (73, 74, 83), prescription refills (42, 52), and injuries (40, 42, 50, 68, 77); future work should continue to explore these and other potentially important outcomes.

Future areas for exposure assessment.

To date, most studies have focused on single power outages, which can allow better characterization of co-exposures but misses the larger burden of repeated outages and underestimates individual-level effects. Studies should consider factors such as duration (e.g., longer outages are likely much worse for health) and location (e.g., outages in San Diego likely have fewer impacts than outages in Maine in the winter). The lack of resolved spatial and temporal exposure data has also limited research. Attribution of adverse health outcomes directly to power outages will require exploiting variability in power outage locations, times, duration, and severity among populations. Zhang et al. successfully did this using NYSPS data (81). Such data are difficult to acquire and do not exist for many regions of the U.S. and world. Therefore, borrowing from digital epidemiology (95), alternative strategies may be used, including remote sensing, internet connected devices, and social media, to characterize spatiotemporal variability in power outages.

Remote sensing.—Researchers can use satellite or aircraft to measure reflected and emitted radiation of the earth. In particular, remote sensing of artificial lights at night (96) can be used to measure power outages (97). In India, Min et al. created a Power Supply Irregularity (PSI) index using nighttime satellite imagery to compute the outage index in all 600,000 villages in India from 1993-2013 (97). Likewise, Román et al. used globally-available, daily nighttime light data from NASA’s Black Marble product to track electricity grid restoration in Puerto Rico after Hurricane Maria (32). These data were used to create three metrics down to 902 barrios: (1) percent recovery; (2) number of days without electricity; and (3) number of customer-hours of interruption.

Internet connected and other consumer devices.—Meier et al. used the power status of internet-connected thermostats, of which 6 million exist in the U.S., to track outages at 15-minute intervals during Hurricane Irma and severe windstorm (98). Others have proposed using smartphones (99) or a host of internet connected devices (e.g., alarm systems, ATM networks) to track power outages (100).

Social media.—Several researchers have used Twitter feeds to track power outages (20, 101-104). One option is to use geotagged tweets (101), but these make up <1% of tweets as most users turn this function off (105). Instead, researchers can search for location-specific terms within tweets, for example, “New York City” or obtain information from registered locations from the users’ accounts (20, 104). Khan et al. also attempted to extract power outage cause in four groups: manmade, natural (e.g., “storm”), wildlife, and faulty equipment (104). This type of data may have increased utility in the future.

Co-exposures/complex disasters: One key and complicating feature of power outages is that they often occur alongside other disasters. Disentangling the impact of power outages from other physical destruction of infrastructure, such as landslides in Puerto Rico following Hurricane Maria (106, 107), fuel crises in Nepal after the 2015 earthquake (108), or windstorms in Ohio following Hurricane Ike (109) may not be possible. Bromet et al. noted a synergistic effect of multiple Sandy-related exposures, where participants experiencing 3-5 exposures (i.e., loss of power, extreme concern about finding gasoline, filing a FEMA claim, extensive home damage, and extensive possession damage) had >6x the odds of PTSD and major depressive disorder compared to those experiencing 0 exposures (56). Many studies implicitly include power outage as an exposure, but the researchers do not explicitly cite power outage as the main exposure of interest. Future work should consider the long-tail, ancillary impact of power outage-related health effects. Sustained power outages result in delayed or interrupted access to healthcare from infrastructure damage, access limitations, inability to pay (from disaster-related impoverishment), and loss of personnel (34, 83, 110). Such deferred care, from delayed treatments, unfilled prescriptions, or failure of DMEs impacts morbidity and mortality—as was in the case after Hurricane Maria in Puerto Rico, where nearly 4000 excess deaths occurred (111).

Future areas for outcome assessment.

Outcome assessment should increase in depth and breadth. Most studies only evaluated immediate effects of power outages. Future studies should expand the timescale to assess outcomes in the short-term and long-term. For example, Xiao et al. defined immediate impacts of Hurricane Sandy as the 30-days after and long-term impacts over the following year (79). They found immediate and long-term increases in ED visits for overall pregnancy complications among women in eight Sandy-exposed New York counties that exceeded increases in 54 less-exposed counties, highlighting the need to extend the relevant follow-up period. While studies have begun to assess perinatal health, future work should also consider children, another susceptible group. Additionally, studies must continue to evaluate the health of older adults, who rely more heavily on electricity-dependent medical equipment (26) and may have cognitive impairment or functional limitations (112), increasing their vulnerability to power outages.

The use of large insurance claims databases or EHRs (113), combined with better exposure assessment, will allow for investigating the impact of power outages on health in at least three important ways. First, it will allow for assessing a larger variety of health outcomes over a longer period of time. Many outcomes, such as maternal and child health or mental health, are known to be sensitive to power outages, yet remained understudied. In addition to these outcomes, exploratory analyses of large claims databases may identify currently unknown outcomes impacted by power outages. Second, it will allow for identifying and studying particularly susceptible subpopulations, such as patients with temperature-sensitive co-morbidities like multiple sclerosis or heart failure. Lastly, it will allow for a more complete description of the racial/ethnic, socioeconomic, and spatially patterned disparities in health response to power outages. Very few studies to date employ spatial and temporal control groups, rigorous statistical methods, and assess for effect modification by import socioeconomic and racial/ethnic sub-groups. This work can assist in identifying crucial

points of intervention to allow for equitable allocation of preparedness, response and recovery activities, and resources to reduce disparities.

Building resilience and supporting response.

Resiliency spans from the individual to regional and global levels and encompasses individual skills, community health, and societal resources (114).

Preparedness.—Individual and community preparedness, including access to alternative power sources, can influence the scope of effect of outages on population health. While baseline levels of individual preparedness appear low, a silver lining of repeated outages is that households become more prepared, buying additional supplies or equipment, over time (19). In Florida, CO poisoning counts increased after the first, but not the second or third consecutive hurricanes, suggesting increased awareness, preparedness, or public health warnings during subsequent hurricanes of the season (50). Personal preparedness can reduce the effect of power outages on health, but low socioeconomic status individuals have limited capacity to store food and water or own a generator (29) and marginalized groups may receive fewer disaster-related warnings (70). Instead, emergency planners should focus on bolstering community resilience—physical, economic, and social—which can take many forms, from strengthening infrastructure to reducing baseline environmental exposure levels and socioeconomic inequities to expanding social capacities (21, 75). Resilient communities deploy collective strategies such as community kitchens, checking on older adults, and providing each other with warmth, food, and shelter during outages (19, 115). Government officials and utilities can further support health and safety by providing advanced warning of power outages as well as estimated duration once the outage has begun.

Electricity infrastructure.—Several steps can be taken to improve electricity grid resiliency and response. These might include better protection against cyber-attacks and tree maintenance (1, 16, 116), improved weather forecasting that allows utilities to prepare, decentralized power generation such as solar and battery storage (117, 118), smart grid technologies like advanced metering infrastructure and isolation and service restoration to update and enhance grid reliability (1, 15). Rather than increase access to generators, modest system upgrades could also allow for low-amperage service (e.g., 20A, which would keep lights or air conditioning on) during outages, possibly paid for via monthly backup insurance payments of <\$1 per customer (119).

Supporting health during outages.—In addition to primary prevention and building resilience, some specific actions can directly support power outage-related health maintenance. For example, notifying patients pre-disaster to refill prescriptions. Prior to a mid-Atlantic blizzard CVS pharmacy randomly notified 2.2 million patients to check their medication supply and found that they had a 9% increased odds of a refill within 48 hours compared to the comparison group (120). Pre-dialysis and other forms of pre-care at healthcare facilities can allow individuals to go safely without power for longer (121). We also must further identify locations and co-morbidities among those reliant on electricity-dependent medical equipment via patient registration with utility companies and information from EHRs or publicly-available data sources like the emPOWER mapping tool (25, 26,

122), and provide community-based charging stations for medical equipment. In North Carolina, >95% of severe CO poisoning after an ice storm occurred in households without CO detectors (123). The benefit-to-cost ratio of installing a CO monitor may be as high as 7.2 to 1 (124). Low-tech interventions, like paired CO monitor and generator purchases, or engineering controls like automatic generator shutoffs, low CO generators, or simply longer generator cords could reduce CO poisoning (125). Finally, in low-resource settings where outages can limit ability to travel to hospitals or results in blackouts at hospitals themselves, mobile clinics can offer distributed access to care (126) and novel technologies, like solar and storage or oxygen reservoir systems, can support further continuity of care (127, 128).

CONCLUSION

As power outages increase in frequency and duration, researchers must expand efforts to understand their impact on individual and population health, refining methods of exposure assessment with attention to varied and disparate outcomes. There is urgent need for these data to inform disaster mitigation, preparedness and response policies (and budgets) in an increasingly energy-reliant world.

Supplementary Material

Refer to Web version on PubMed Central for supplementary material.

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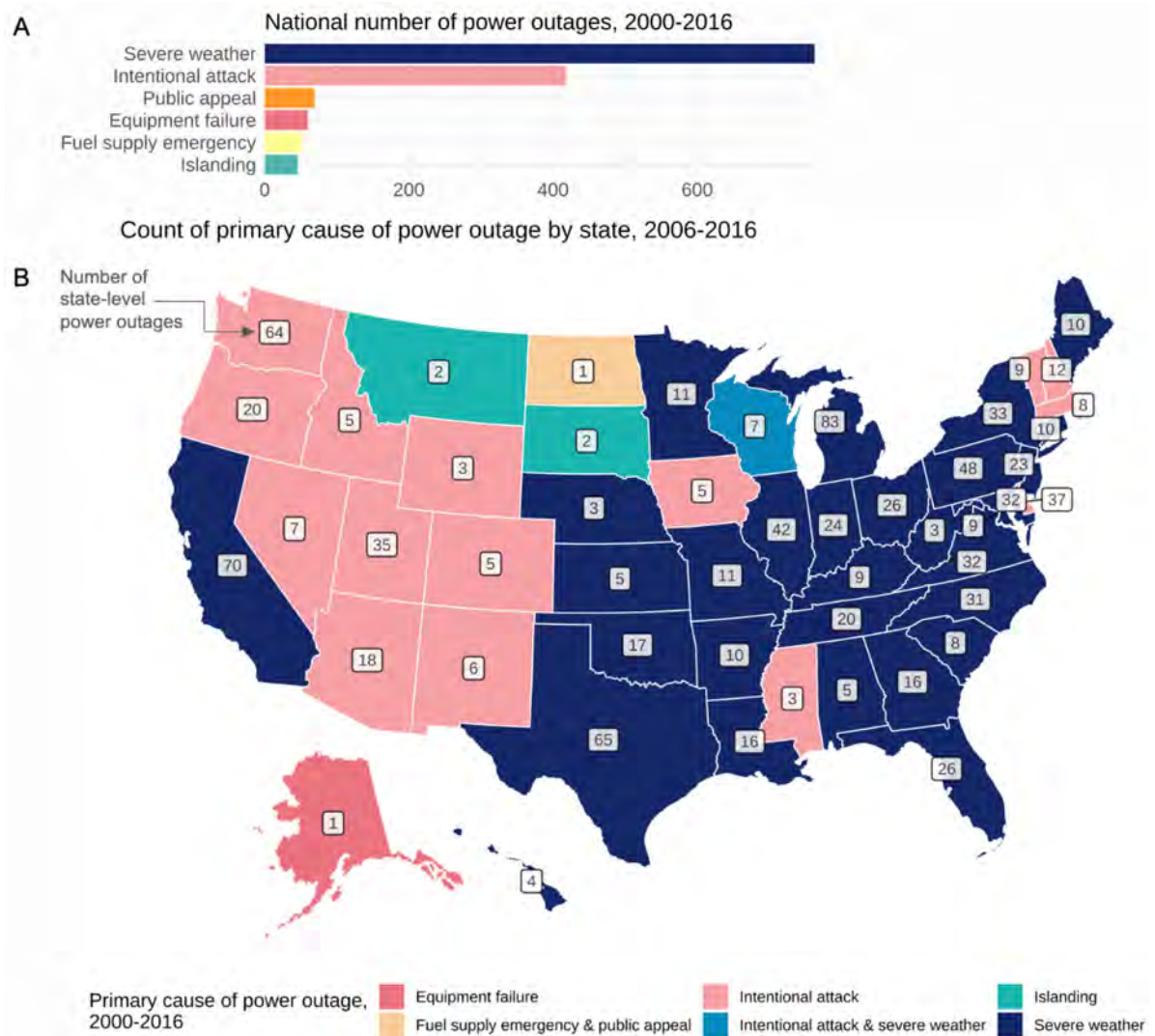


Figure 1: Summary of large power outages in the United States from 2000-2016.

A) Number of large power outages by cause between 2000-2016. B) Count of outages by primary cause type by state between 2000-2016. For example, Texas had 65 power outages caused by severe weather between 2000-2016. Data from Mukherjee et al. 2018 (10), which they assembled from publicly-available datasets. A large power outage is defined by the U.S. Department of Energy as: 50,000+ customers affected or an unplanned loss of 300 MW.

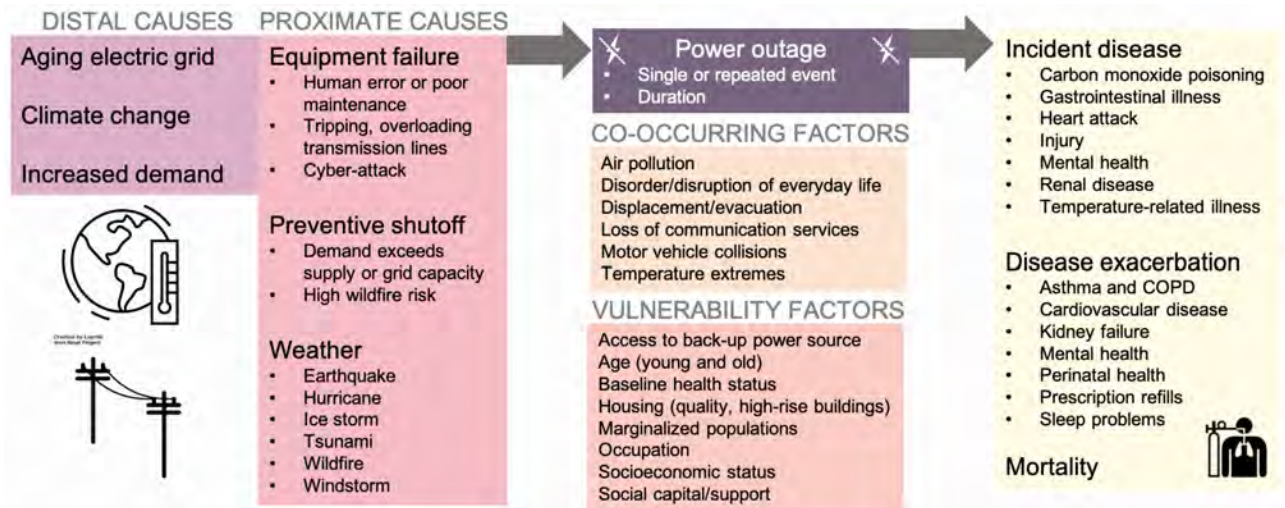


Figure 2: Schematic showing hypothesized pathways between power outages and disease exacerbation.

We illustrate co-occurring factors such as displacement, extreme temperatures, and air pollution, as well as vulnerability factors that might increase the risk of adverse health outcomes during power outages, including baseline health status, socioeconomic status, and social support.

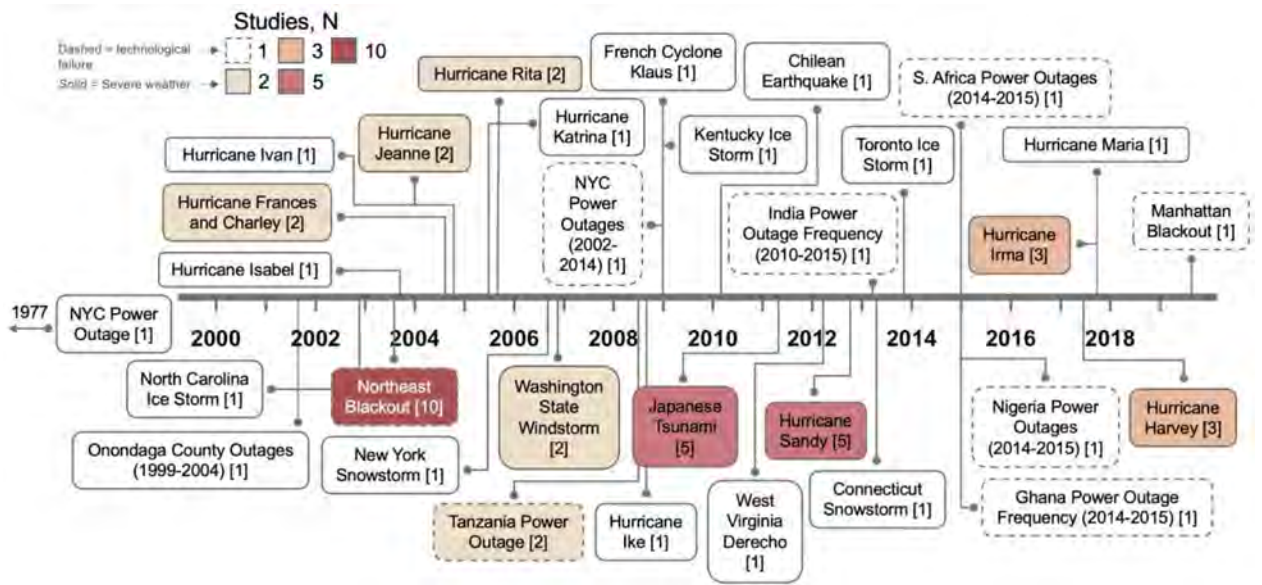


Figure 3: Timeline of the power outages evaluated by the epidemiologic literature between 2004-2020.

Dashed outlines represent outages caused by technological failure and solid outlines those caused by severe weather. Numbers in square brackets denote the number of studies evaluating the specific outage and fill colors get closer to red with more studies evaluating the outage.

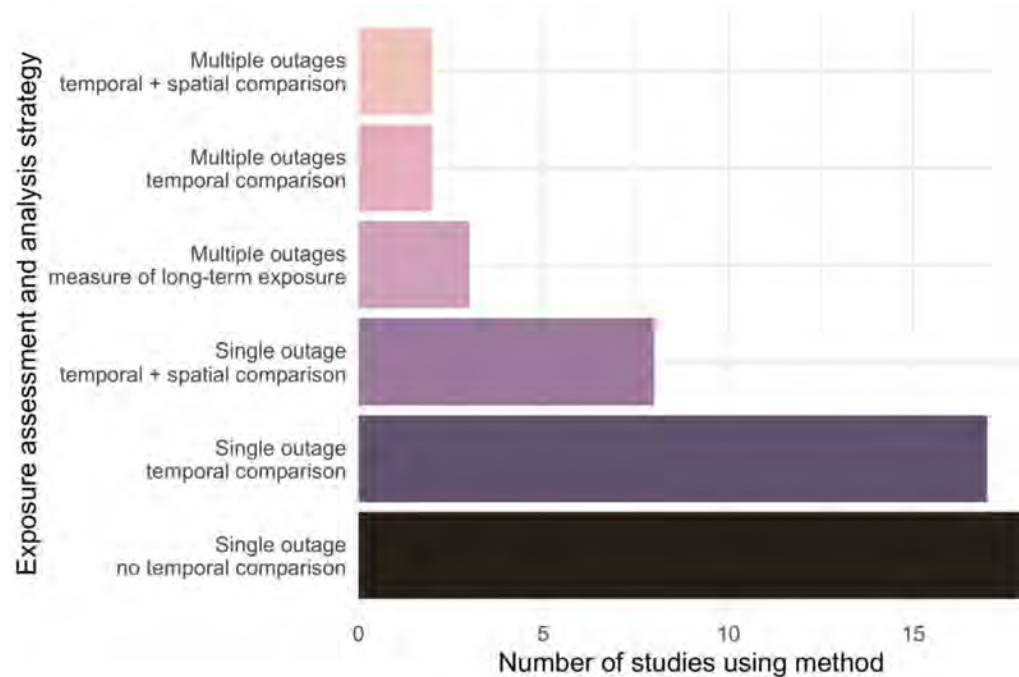


Figure 4: Exposure definition and analytic comparison groups used in 50 reviewed epidemiologic studies, 2004-2020.

Most studies evaluated a single outage by describing outcomes after the event among the exposed population (single outage, no temporal comparison). Eight studies evaluated a single outage but used both spatial and temporal comparison groups to make inference (single outage, temporal + spatial comparison). Three studies used measures of long-term exposure from multiple outages to assign levels of power outage exposure to the study population (multiple outages, measure of long-term exposure).

Table:

Recommendations for future exposure measurement and outcome assessment

Exposure assessment	Outcome assessment
<ul style="list-style-type: none"> • Consider duration of outage as a risk factor • Incorporate location of power outage (e.g., temperate versus cold climate) • Link outage and health data in space and time • Use tools from digital epidemiology: remote sensing, internet-connected devices, social media to characterize power outages • Account for co-exposures: physical hazards, psychosocial hazards, loss of property, etc. 	<ul style="list-style-type: none"> • Include both short- and long-term effects • Expand studies to include perinatal health, mental health, and outcomes among those with chronic illness • Consider susceptible populations including people of color, children, older adults, and those of lower socioeconomic status or with co-morbidities • Use large insurance databases or electronic health records to study large populations

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How Do Power Outages Affect Households?

About 1 in 4 Households Experienced a Power Outage in the Span of a Year

October 02, 2024

Written by: Patrick Madamba

About 33.9 million or 1 in 4 households nationwide reported they were completely without power at least once in the 12 months before they were interviewed for the 2023 American Housing Survey (AHS).

Approximately 70% or 23.6 million of the households reporting an outage said at least one outage lasted 6 hours or more.

Homeowners were more affected by power outages than renters: 28.3% of homeowners reported a power outage compared to 19.9% of renters.

A power outage [<https://www.sciencedirect.com/science/article/pii/S2210670723005437>] occurs any time the flow of electricity to a home is interrupted due to circumstances beyond the user's control, including:

- Natural causes like severe weather and falling trees.
- Human error such as systems malfunctions, poor maintenance, car collisions with electric power infrastructure.
- Overload factors like the ones caused by high demand for power during heat waves.

Who Were Disproportionately Affected?

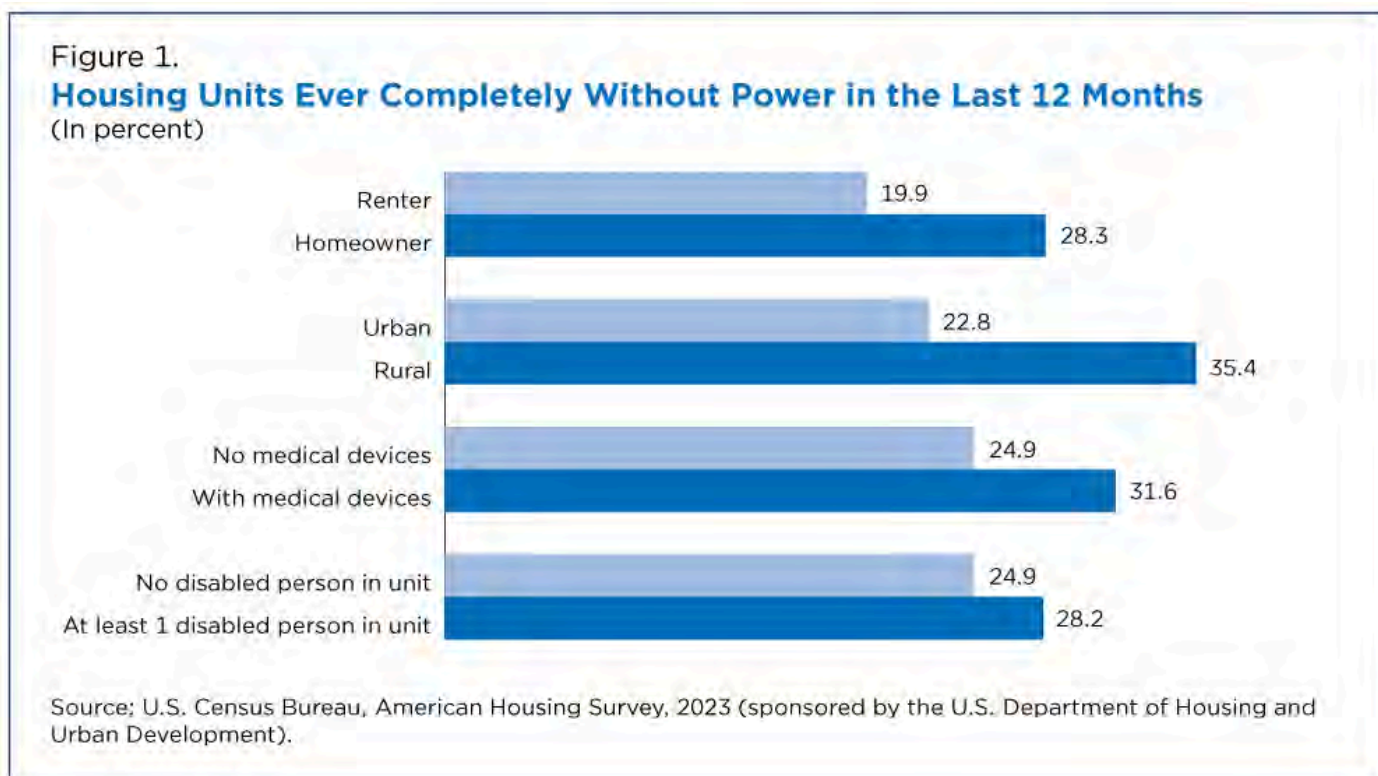
Homeowners were more affected by power outages than renters: 28.3% of homeowners reported a power outage compared to 19.9% of renters.

A smaller share of households in urban areas [</programs-surveys/geography/about/faq/2010-urban-area-faq.html>] experienced power outages than households in rural areas: 22.8% of households in urban areas compared to 35.4% of those in rural areas.

People dependent on life-sustaining electrical medical equipment are particularly vulnerable during power outages.

Around 14.5 million households reported having medical devices that require electricity to operate. Nearly a third of these households (31.6%) were affected by power outages.

Power outages can pose unique challenges for individuals with disabilities and their caretakers. In 2023, 28.2% or 8.6 million of the more than 30 million households with at least one person with a disability reported experiencing a power outage in the previous 12 months.



[/content/dam/Census/library/stories/2024/10/power-outages/figure-1.jpg]

Power Outages in Metropolitan Areas

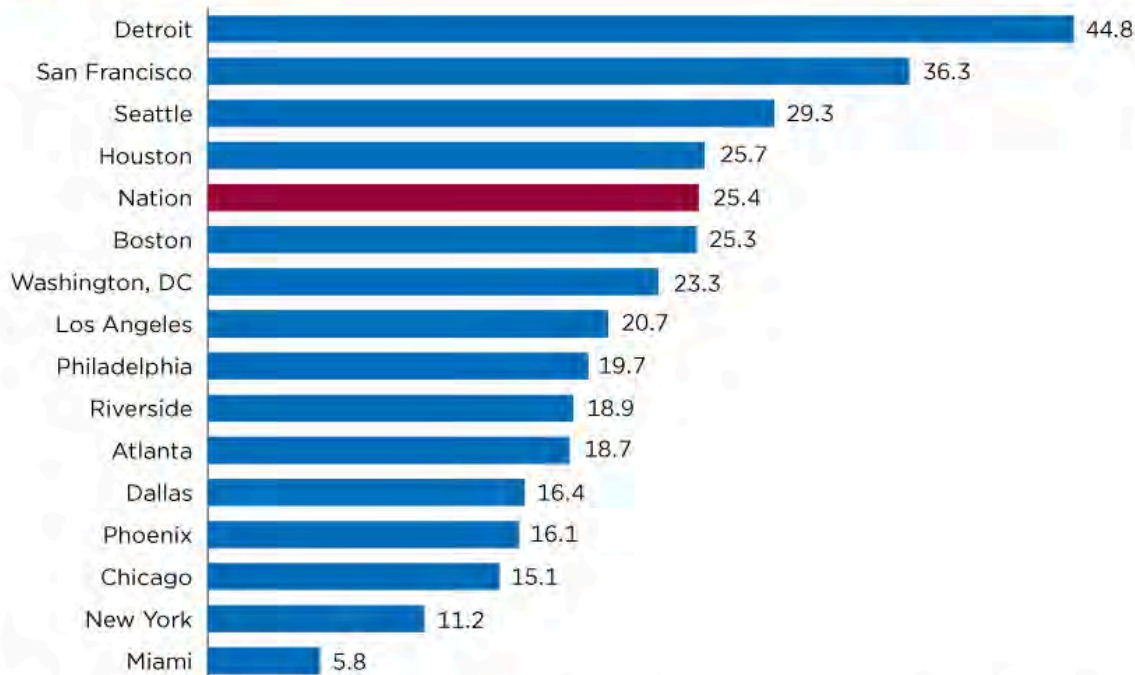
Of the 15 largest U.S. metropolitan areas, Detroit was the most affected with 44.8% of households reporting a power outage in the last 12 months. The San Francisco (36.3%) and Seattle (29.3%) metropolitan areas rounded out the group of metropolitan areas with percentages higher than the national average of 25.4%.

On the other end, only 135,000 households in the Miami metropolitan area (5.8%) reported a power outage. The New York metropolitan area was the second lowest, with only 885,000 or 11.2% of its estimated 7.9 million households reporting being without power at some point in the previous 12 months.

Figure 2.

Top 15 Metro Areas With Housing Units Ever Completely Without Power in the Last 12 Months

(In percent)



Source: U.S. Census Bureau, American Housing Survey, 2023 (sponsored by the U.S. Department of Housing and Urban Development).

[/content/dam/Census/library/stories/2024/10/power-outages/figure-2.jpg]

Difficulties Power Outages Create

Households that reported a power outage were further asked about difficulties it caused.

Power outages can make it difficult to keep working with so many electronic devices that rely on a power source. And according to the AHS, 2.4 million housing units had someone who missed work because of a power outage. This represents 7.9% of households that both experienced an outage and had at least one person in the household working.

When the electricity goes out, so does the refrigerator which can lead to food and medicine spoilage during long outages. The Food and Drug Administration [<https://www.fda.gov/food/buy-store-serve-safe-food/food-and-water-safety-during-power-outages-and-floods>] advises that food that requires refrigeration is no longer safe to consume if a power outage lasts at least four hours, and recommends consumers throw out refrigerated medicine [<https://www.cdc.gov/natural-disasters/response/what-to-do-protect-yourself-during-a-power-outage.html>] if outages last a day or more unless the drug label states otherwise.

Around 14% of households (4.9 million housing units) that experienced an outage said they had food that spoiled, and 705,000 households or 2.9% of those with refrigerated medicine said their medicine spoiled.

Power outages can lead to additional expenses like an overnight hotel stay or needing to hire a contractor to repair frozen pipes or a flooded basement because of a sump pump failure.

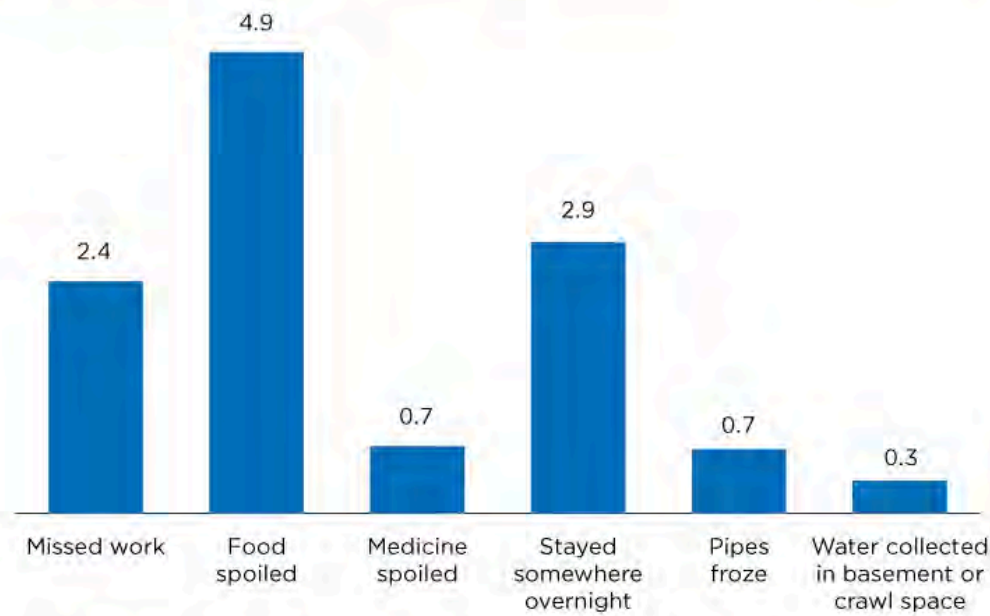
About 2.9 million households (8.4%) reported they had to stay away from home overnight due to a power outage.

Frozen pipes affected an estimated 673,000 housing units in the previous 12 months. And about 343,000 households reported water collected in their basement or crawl space because their sump pump stopped working due to a power outage.

Figure 3.

Difficulties Encountered by Housing Units That Reported Being Ever Completely Without Power in the Last 12 Months

(In millions)



Source: U.S. Census Bureau, American Housing Survey, 2023 (sponsored by the U.S. Department of Housing and Urban Development).

[\[content/dam/Census/library/stories/2024/10/power-outages/figure-3.jpg\]](#)

AHS is sponsored by the U.S. Department of Housing and Urban Development (HUD) and conducted by the U.S. Census Bureau. It is the United States' most comprehensive housing survey, providing information on the physical condition of homes and neighborhoods; the costs of financing and maintaining homes; and the characteristics of people who live in these homes over time.

All comparative statements have undergone statistical testing and, unless otherwise noted, all comparisons are statistically significant at the 10% significance level.

More information on confidentiality protection, methodology, sampling and nonsampling error and definitions is available on the AHS page [\[/programs-surveys/ahs.html\]](#).

Patrick Madamba is a survey statistician in the Census Bureau's Social, Economic and Housing Statistics Division.

This article was filed under:

[Data Services \[library/stories.html?visual-list-fb55843e87:filters=Census:Topic/census-operations/data-equity\]](#)

[Housing \[library/stories.html?visual-list-fb55843e87:filters=Census:Topic/Housing\]](#)

[Population \[library/stories.html?visual-list-fb55843e87:filters=Census:Topic/ThePopulation\]](#)

Related Statistics

American Housing Survey (AHS)

The AHS is sponsored by the Department of Housing and Urban Development (HUD) and conducted by the U.S. Census Bureau.

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June 28, 2024

Census Bureau construction data show the cost and characteristics of the nation's new homes by region.

[\[/library/stories/2024/06/national-housing-month.html\]](/library/stories/2024/06/national-housing-month.html)

Housing

Owning or Renting the American Dream

June 29, 2023

In recognition of American Housing Month and National Homeownership Month, we explore housing data from the U.S. Census Bureau.

[\[/library/stories/2023/06/owning-or-renting-the-american-dream.html\]](/library/stories/2023/06/owning-or-renting-the-american-dream.html)

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Housing

Recent Homebuyers Face Highest Mortgage Payments in Nearly Two Decades

September 11, 2025

Despite higher median monthly mortgage payments, homeowners who moved in 2024 lived in homes with lower median values than those who moved in 2021.

[\[/library/stories/2025/09/recent-homebuyers-mortgage-payments.html\]](/library/stories/2025/09/recent-homebuyers-mortgage-payments.html)

Health

Uninsured Rates Up in 18 States and District of Columbia

September 11, 2025

The percentage of people with Medicaid coverage dropped in 30 states, contributing to a rise in the uninsured rate from 2023 to 2024.

[\[/library/stories/2025/09/uninsured-rates.html\]](/library/stories/2025/09/uninsured-rates.html)

Housing

Nearly a Quarter of Homeowners Paid Condo or HOA Fees in 2024

September 11, 2025

New data show that about 5.5 million households paid less than \$50 a month and 3 million over \$500 in condo or homeowners association fees in 2024.

[\[/library/stories/2025/09/condo-hoa-fees.html\]](/library/stories/2025/09/condo-hoa-fees.html)

Income and Poverty

Supplemental Poverty Rate Below Official Rate in Only 10 States

September 09, 2025

Annual national SPM rates ranged from 12.4% to 12.9% and official poverty rates ranged from 10.6% to 11.5% between 2022 and 2024.

[\[/library/stories/2025/09/spm-below-official-poverty-rate.html\]](/library/stories/2025/09/spm-below-official-poverty-rate.html)

Question:

1. Refer to Direct Testimony of Jessica R. Byrom at Pages 47-48 in which the witness discusses the Company's regression analysis on residential shutoffs, specifically regarding the finding that "Percentage Minority Population in a census tract was statistically significant and associated with increasing disconnection rate."
 - a. Please list each type of information the Company collects on customers that is available on the customer account level.
 - b. On the customer account level, does the Company have access to customer names?
 - c. On the customer account level, does the Company have access to customer addresses?
 - d. Do the employees charged with determining when a customer's energy is shut off and/or the employees who perform the actual shut offs have access to customer names?
 - e. Do the employees charged with determining when a customer's energy is shut off and/or the employees who perform the actual shut offs have access to customer addresses?
 - f. Witness Byrom states that "[a]uthorized Consumers Energy employees also have access to very specific customer data as posted in its Customer Privacy notice and highlighted in both its Electric and Natural Gas service tariffs."
 - i. Please list each type and format of the "very specific customer data" available to Company employees.
 - ii. Please identify which types and formats of "very specific customer data" are viewable to employees involved in the disconnection procedure to determine when to shut off a customer's energy.
 - iii. Please list the job title and description for each authorized Company employee who has access to the "very specific customer data."
 - g. On the Company's website at <https://www.consumersenergy.com/privacy>, referenced by Witness Byrom at page 48, "driver's license" is listed as a type of information collected by the Company.
 - i. On the customer account level, does the Company have access to a full or partial image scan of a customer's driver's license?
 - ii. Do the employees charged with determining when a customer's energy is shut off and/or the employees who perform the actual shut offs have access to a full or partial image scan of a customer's driver's license?
 - iii. Please list each type of information accessible to the Company from a customer's driver's license (for example, image of the person, eye color, name, height, restrictions, etc).
 - h. Please describe in detail the Company's current disconnection procedure.

- i. Witness Byrom mentions the Company's plan to analyze the regression analysis results "expeditiously by standing up an internal problem-solving process in June 2025."
 - i. Please describe in detail the "internal problem-solving process."
 - ii. Please describe in detail the Company's planned timeline to complete its problem-solving process.
 - iii. Please provide any reports or documentation resulting from the "internal problem-solving process" since the process began.

Response:

- a. Information the Company collects on customers that is available on the customer account level includes: Customer name, service address, Consumers Energy account number, mailing address, phone number, email address, date of birth, last three digits of a customer's driver's license number, and last four digits of their social security number.
 - b. Yes.
 - c. Yes.
 - d. Yes.
 - e. Yes.
 - f.
 - i. **Customer Data:** Customer name, service address, Consumers Energy account number, mailing address, phone number, email address, date of birth, last 3 digits of the customer's driver's license number, and last 4 digits of their social security number.
 - g. **Account Data:** Meter reads, consumption data, and billing data
 - ii. **Customer Data:** Customer name, service address, Consumers Energy account number, mailing address, phone number, email address, date of birth, last 3 digits of their driver's license number and last 4 digits of their social security number.
- Account Data:** Meter reads, consumption data, and billing data
- iii. It is not feasible to provide this information as the majority of employees with customer-facing roles (including customer and operations organizations specifically) have access to this customer data through the Company's SAP customer relationship management system to perform their essential functions.
- h.
 - i. No.
 - ii. No.

iii. This information is not available at the account level, or by anyone performing disconnections. The only time an image scan is used by the Company is if at the time of new service identity needs to be established by our theft or fraud teams. The image is used to confirm identity and approve service. Only the last three digits of the driver's license is documented for future use, nothing beyond that.

- i. If a bill is delinquent 18 days after the due date, and all required communication attempts are made, a customer is then eligible for disconnection.

At the time of scheduling both disconnections reports are run validating that the delinquent charges have not been paid.

In the case of manual disconnections, the location of the customer would be used to ensure the routes for the field representatives are being optimized.

The Company's system monitors payments clearing the delinquent charges even after the disconnections are scheduled up to their completion. If payment occurs at any time, the scheduled disconnections cancels automatically.

- j. (i) The team is meeting biweekly to review data relevant to the regression analysis, customer data related to payment behaviors, reviewing customer processes, etc. The cross-functional team including members from credit & collections, data analytics, community affairs, and DEI teams.

(ii) 9/24/2025

(iii) Please see U21870-UCC-CE-0233_Byrom_ATT_1, U21870-UCC-CE-0233_Byrom_ATT_2, and U21870-UCC-CE-0233_Byrom_ATT_3.

Witness: Jessica R. Byrom

Date: August 26, 2025

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the Application of
CONSUMERS ENERGY COMPANY for
authority to increase its rates for generation and
distribution of electricity and for other relief.

U-21870

ALJ Jonathan F. Thoits

PROOF OF SERVICE

I, Mark N. Templeton, certify that an electronic copy of the **Accompanying Exhibits UCC-38 to UCC-51 (Part 4 of 6) for the Direct Testimony of Sergio Cira-Reyes on Behalf of Urban Core Collective** was served on the following on September 30, 2025.

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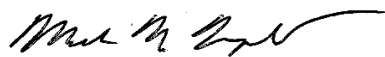
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The statements above are true to the best of my knowledge, information, and belief.

Date: September 30, 2025

Abrams Environmental Law Clinic
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By:



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