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October 16, 2025

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

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

Dear Ms. Felice:

Attached for electronic filing in the above captioned matter are DTE Electric Company's and DTE Gas Company's Reply Comments.

Very truly yours,

Breanne K. Reitzel

BKR/cdm
Attachment

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter, on the Commission’s own)
motion, to process extreme weather condition)
policies filed in compliance with Mich Admin)
Code, R 460.134 for approval.)
_____)

Case No. U-20140

REPLY COMMENTS OF DTE ELECTRIC COMPANY AND DTE GAS COMPANY

I. BACKGROUND

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

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

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

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

II. REPLY COMMENTS

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

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

Clean Energy Organizations (CEO) highlights racial disparities in disconnection rates based on analyses from Consumers Energy and DTE rate cases. They recommend the Commission investigate whether disconnection policies disproportionately affect BIPOC communities and ensure any extreme weather protections are equitable. They cite Minnesota’s Xcel Energy as a model for stakeholder collaboration to address disparities.

As stated in the U-21860 Rebuttal Testimony of Witness Jason Sparks, disconnection policies are governed by Michigan Public Service Commission (MPSC) regulations and approved tariff provisions and are based solely on objective criteria such as account status and payment history. Factors such as geographic location, race, ethnicity, or income level are not considered in disconnection decisions.

DTE Energy affirms that its disconnection policies, including those related to extreme weather protections, are applied uniformly and without bias across its service territory. DTE recognizes the importance of ensuring that all policies, particularly those affecting vulnerable populations during extreme weather events, are equitable and transparent

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

CEO recommends utilities provide disconnection data aggregated to census tracts and analyze it by demographics. They suggest making this data available on the MPSC’s Utility Customer Data Website.

While the Company appreciates the intent behind the recommendation to collect, aggregate and report disconnect data at the census tract level, DTE does not believe this approach is practical nor necessary to achieve meaningful insights into customer disconnection trends. This methodology raises the following concerns:

- Data privacy – The level of detail for census tracts is more granular than that of zip code. By narrowing the number of households in each data set, it may be possible to match customers to disconnect information.
- System compatibility – The Company’s billing system is not configured to accommodate disconnect data at the census tract level and would require the Company to develop new programming and processes for defining and collecting customer data for census tracts.

III. CONCLUSION

DTE appreciates the opportunity to provide comments on extreme weather condition policies.