

October 16, 2025

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

RE: MPSC Case No. U-20140 – 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

Dear Ms. Felice:

Enclosed for electronic filing in the above-captioned case, please find **Consumers Energy Company’s Reply Comments on Extreme Weather Condition Policies**.

This is a paperless filing and is therefore being filed only in PDF.

Sincerely,

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STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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

**CONSUMERS ENERGY COMPANY’S REPLY COMMENTS ON
EXTREME WEATHER CONDITION POLICIES**

I. INTRODUCTION

On March 21, 2025, the Michigan Public Service Commission (“MPSC” or the “Commission”) issued an Order in Case No. U-21585 stating that modifications to the current extreme weather policies should be considered and indicated that broader discussion should be conducted as part of Case No. U-20140. As such, the Commission issued an Order in Case No. U-20140 on August 7, 2025 (“August 7 Order”) seeking input from interested persons on 11 questions related to extreme weather condition policies. Initial comments were to be filed by September 18, 2025. Consumers Energy Company (“Consumers Energy” or the “Company”); Northern States Power Company – Wisconsin; SEMCO ENERGY Gas Company; DTE Electric Company and DTE Gas Company (“DTE”); Indiana Michigan Power Company; Michigan Electric and Gas Association; Soulardarity, Urban Core Collective, and We Want Green, Too (comments provided by Frontline Energy Transition Partners (or “Frontline”)); and the Ecology Center, Environmental Law & Policy Center, Union of Concerned Scientists, and Vote Solar (collectively the Clean Energy Organizations (“CEO”)) filed initial comments on the Commission’s Questions on Extreme Weather Condition Policies.

In the August 7 Order, the Commission also provided an opportunity for interested persons to file reply comments by October 16, 2025. Consumers Energy would like to respond to initial comments submitted by Frontline Energy Transition Partners and the CEO, and it provides its reply comments below.

II. REPLY COMMENTS

1. Seasonal / Historical Peak Temperature Protections

Frontline Energy Transition Partners recommended implementing seasonal protections during peak summer months, and the CEOs advocated for blanket shutoff moratoriums during the hottest weeks of summer, using historical temperature data to preemptively activate protections. Frontline Comments, page 12; CEO Comments, page 3. Consumers Energy does not support protections based on historical temperatures or calendar months, since these factors do not guarantee future temperatures will exceed the temperature threshold that would merit suspending disconnections. The Company monitors temperatures continuously and suspends disconnections when temperatures are forecasted to exceed 90°F. This allows real-time protection for customers on the hottest days without overextending these protections to cooler days.

2. Pre- and Post-Extreme Heat Event Protections

Frontline Energy Transition Partners proposed that disconnection restrictions begin 24 hours prior to an extreme heat event and continue for at least 24 hours after an extreme heat event ends, and the CEOs suggested that protections begin hours or days before the forecasted extreme weather event. Frontline Comments, page 13; CEO Comments, page 4. Consumers Energy disagrees. Again, the Company continuously monitors temperature forecasts to determine whether to suspend disconnections. Temperatures often fluctuate within the 24-hour period prior to and following an extreme heat event; extending the disconnection moratorium for a

pre-determined amount of time would create situations when disconnections are suspended despite cooler temperatures. Likewise, there are instances when forecasts do not predict temperatures above 90°F but temperatures exceed forecasts. In such circumstances, the Company would not be able to meet a 24 hours notice requirement should temperatures spike unexpectedly, leading to immediate suspension of disconnections.

Consumers Energy performs disconnections Monday through Thursday from 8:00 AM – 4:00 PM. Temperatures often drop below the protection threshold outside of this window; the Company does not reinstate disconnections after 4:00 PM.

3. Racial Disparities

The CEOs recommended that the Commission investigate racial disparities in disconnection rates by reviewing DTE and Consumers Energy’s current disconnection policies, including any extreme weather protections, and assess whether these disproportionately affect Black, Indigenous, and People of Color (“BIPOC”) communities. CEO Comments, pages 1–3. The Company appreciates the recommendation and is, in fact, already doing related work at the Commission’s direction. On March 21, 2025, the Commission issued an order in Case No. U-21585 directing Consumers Energy to perform regression analysis on residential disconnections and present this regression analysis in its next electric rate case. The Company has been engaged in this work, and information can be found in Exhibit A-138 (MPK-28) in its current electric rate case (Case No. U-21870), including information on disconnections in environmental justice communities, which are identified using, among other criteria, a BIPOC factor.

4. Tracking and Reporting

The CEOs proposed that utilities be required to regularly provide disconnection data aggregated to census tracts, including demographic analysis, and that this data be made publicly

available on the MPSC’s Utility Customer Data Website. They also supported the submission of twice-yearly reports by utilities on when extreme weather protections are triggered. CEO Comments, pages 5–6. Consumers Energy believes that this level of tracking and reporting would create unnecessary administrative burden and duplicate another report. The Company already provides disconnection data as part of its quarterly reports in Case No. U-18120.

5. Standardization of Extreme Weather Disconnection Policies

Frontline Energy Transition Partners recommended that disconnections be prohibited when the forecasted temperature will reach 90°F or above, or the National Weather Service (“NWS”) issues a heat advisory, excessive heat watch, or excessive heat warning for the service area. They also proposed that disconnection restrictions extend to weekends and holidays when extreme heat is forecast for any portion of those periods. Frontline Comments, pages 12–13. The CEOs proposed that NWS heat advisories be used as triggers for shutoff moratoriums and suggested that a uniform weather-related disconnection policy be implemented across all Michigan utilities. CEO Comments, pages 3–4. Consumers Energy is open to engaging in dialogue to explore what a consistent and efficient approach might look like across the utility industry. The Company already applies a threshold of 90°F to suspend disconnects and refrains from disconnections on the weekend and holidays. While the Company currently uses a blend of other weather-related websites to determine the temperature forecast, it is open to using NWS data.

6. Reconnection of Customers

Frontline Energy Transition Partners Utilities suggested that utilities be required to make reasonable efforts to reconnect customers who were disconnected due to payment delinquency, and the CEOs appeared to advocate for utilities to reconnect customers during extreme weather and offer modified payment plans. Frontline Comments, page 13; CEO Comments, page 4.

Consumers Energy currently attempts to reconnect customers who were disconnected due to payment delinquency in advance of anticipated extreme weather. When temperatures are expected to exceed 90°F for two or more consecutive days, Consumers Energy contacts all customers who have been disconnected in the last 30 days that have yet to reconnect their service, advising of the conditions and providing referral resources for reconnection.

Respectfully submitted,

CONSUMERS ENERGY COMPANY