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March 13, 2026

Ms. Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 W. Saginaw Highway
Lansing, MI 48909

Re: MPSC Case No. U-21973

Dear Ms. Felice:

Enclosed herewith for filing in the above-referenced matter, please find the Direct Testimony and Exhibit of Dawn Huth on behalf of the Retail Energy Supply Association, an exhibit list, and the proof of service regarding same.

Very truly yours,

Jennifer Utter Heston

Enclosures
Cc: All Parties of Record

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, of the application of DTE GAS COMPANY for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of natural gas, and for miscellaneous accounting authority.	))))))	Case No. U-21973

DIRECT TESTIMONY AND EXHIBIT OF DAWN HUTH ON BEHALF OF THE RETAIL ENERGY SUPPLY ASSOCIATION

March 13, 2026

Introduction and Summary

Q. Please state your name and business address.

A. My name is Dawn Huth. My business address is 1499 Windhorst Way, Suite 240, Greenwood, IN 46143.

Q. By whom are you employed and in what capacity?

A. I am employed by NRG Business Marketing as Regional Operations Manager.

Q. On whose behalf are you testifying in this proceeding?

A. I am testifying on behalf of the Retail Energy Supply Association (RESA). [1]

Q. Briefly describe your educational experience and relevant qualifications.

A. I am an energy industry professional with over 25 years of experience in the natural gas sector. I started in the industry at Indiana Gas (Centerpoint North) working with Commercial and Industrial (C&I) customers in the gas transportation department. I continued my career at multiple marketing companies; Pinnacle Energy, Proliance Energy, BP, Direct Energy, and now NRG, mainly through mergers and acquisitions. These roles included LDC Program Management, Optimizing Retail Gas Supply, Scheduling, Balancing, Billing, Tariff Review, Pricing, and Managing Gas Operations Regional Team. I worked closely with the local distribution company (LDC) gas control department to ensure efficient operations while at the LDC. Throughout my career, I have developed extensive knowledge of energy markets and gas operations.

[1] The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization and may not represent the view of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial customers. More information on RESA can be found at www.resausa.org.

Q. What is the purpose of your testimony in this proceeding?

A. The purpose of my testimony is to propose that DTE Gas company (DTE) change its operational tariff rules to allow transport end-use customers to be combined into groups or pools under each supplier's discretion. Pooling is a common industry practice; most of the utilities that I work with, including in Michigan, allow marketers to pool their transportation customers into groups to achieve greater efficiencies. There are many utilities that are monthly balanced that offer pooling along with storage banking.

Pooling for Gas Transportation Customers

Q. What is pooling?

A. Pooling, as I am proposing, is simply the grouping of transportation service customers that are all being supplied by the same supplier. It allows suppliers to make a single supply nomination for a group of customers instead of numerous individual nominations. The customers' usage is then offset by the pool supply. It is an industry concept that has been in place for decades. Many gas transportation programs and Customer Choice programs utilize the pooling concept.

Q. Is pooling, as you propose it, the same as the formal NAESB definition?

A. Pooling, as I am proposing it, is different from pooling as NAESB defines it. NAESB defines pool balancing as: (1) the aggregation of gas from multiple physical and/or logical points to a single physical or logical point, and/or (2) the dis-aggregation of gas from a single or logical point to multiple physical and/or logical points.[2] My proposal would provide transportation service customers being supplied by a supplier the option to join

[2] NAESB Nominations Related Standards 1.2.3, See 18 C.F.R. 284.12(a)(1)(ii)(2009) incorporating by reference NAESB Standards.

other customers in that supplier's pool. This is a common industry practice in states surrounding Michigan, as well as in Michigan itself.

Q. Do you have experience with pooling in other gas transportation markets?

A. Yes. Peoples Gas Light and Coke Company (Peoples), Nicor Gas Company (Nicor) and Consumers Energy (Consumers) all have transportation programs that include storage and pooling. Peoples and Consumers are monthly balanced. Peoples and Nicor have some customers with telemetering while Consumers has no telemetering. These utilities each have multiple upstream pipelines that deliver into them with limited restrictions on how suppliers need to serve their customer base on the upstream pipelines. I manage numerous customers and pools in more than 20 utility service territories. The majority of LDCs that I work with offer pooling services for their customers. Very few utilities still individually balance customers, and most of the LDCs that do not offer pooling are small utilities unlike DTE.

Q. Are there benefits of pooling for transportation customers?

A. Yes. Transportation customers benefit from pooling through reduced costs and imbalance fees, expanded flexibility, and increased supplier options.

Q. How does pooling reduce costs and support customer affordability?

A. Pooling reduces costs for the supplier and customers because it dramatically reduces the number of nominations a scheduler is required to make, which in turn reduces the time and expense of making nominations for each individual customer. For example, if a supplier has 50 transportation customers, without pooling, that supplier will need to submit 50 separate nominations to the utility according to the utility nomination deadlines. However, if those customers elect to be grouped into a single pool, then that supplier can submit a

single nomination for the pool to the utility. Reducing the number of required nominations reduces the supplier's overhead expense to conduct scheduling and balancing. The reduction in a supplier's overhead expense will ultimately be passed down to the customer in the form of more competitive pricing.

Q. Are there other costs that would be reduced with a pooling program?

A. Yes, due to the efficiencies of pooling, customers will experience reduced balancing costs. Today, because there is no pooling, any charges for being over the customer's tolerance or for withdrawing too much gas are directly assessed to the customer. With pooling, these charges would be reduced because the charges are netted across the pool. Accordingly, not only does pooling reduce the number of nominations, but also the charges assessed to suppliers which are passed on to customers directly or through their competitive supply offers. I have set forth an example in the table below, using seven customers and assuming a $1 utility charge per unit of imbalance.

Customer	Imbalance Per Customer in DTH	Total Unpooled Cost @ $1	Cumulative Net Pool Imbalance	Cumulative Pooled Cost @ $1
A	15	$ 15.00	15	
B	20	$ 20.00	20	
C	10	$ 10.00	10	
D	-10	$ 10.00	-10	
E	-20	$ 20.00	-20	
F	-12	$ 12.00	-12	
G	-4	$ 4.00	-4	
		$ 91.00	-1	**$ 1.00**

Q. How does pooling provide benefits through expanded flexibility?

A. Today, DTE transportation customers are required to be standalone customers using one or more suppliers. Pooling will give customers increased flexibility by allowing them to

not only remain as a standalone customer utilizing one or more suppliers, but will also give them the additional option to join a supplier's pool and obtain the benefits of sharing balancing risks with a larger group of customers. The option whether to join the pool will ultimately belong to the customer.

Q. How does pooling increase supplier options for the customer?

A. Suppliers may not participate in the DTE gas transportation program today because pooling is not allowed. Without pooling, more scheduling resources are necessary because of the number of individual nominations, and balancing required and because of the number of individual storage banks/ATLs that are required to be individually balanced. By implementing pooling, the scheduling and balancing requirements could be more easily managed and therefore the market would be more appealing to suppliers who currently choose not to serve DTE customers. A pooling option could benefit customers through increased competition and more supplier options for commercial and industrial customers. In my experience utilities that offer pooling have fewer standalone customers, with most customers choosing to be in a supplier's pool.

Q. How does pooling affect gas storage banks?

A. Pooling creates the potential for more storage value. The total amount of storage remains the same. However, when the storage is aggregated and managed under pooling, the supplier can then optimally manage the storage because just like balancing you will have customers offsetting each other's imbalances. Managing all the storage banks individually makes it more difficult to fully utilize storage resources allocated to transportation customers. Through pooling, suppliers can extract more value from the same amount of assets and then pass that value back to the customer in the form of pricing discounts.

Q. Would pooling result in an increase in costs to other customers?

A. Pooling should have no impact on non-pooling customers. This is a benefit to customers that choose to join a pool.

Q. Does pooling adversely affect system reliability?

A. No. Pooling has no adverse impact to system reliability. Pooling does not change the supplier's commitment to match supply with demand.

Q. Are there benefits to the utility from pooling?

A. Yes. The utility should see reduced administrative costs from pooling. Rather than monitor each customer account individually, the utility would be able to monitor fewer accounts that contain one or more individual pooled customer accounts. DTE would need to verify fewer nominations and storage banks even though the total volumes remain the same under pooling. Pooling would also simplify the tracking of imbalance nominations. The utility should ultimately experience reduced manpower costs and lower invoicing costs.

Q. Are there pooling program start-up costs?

A. There could be.

Q. Should the utility recover those costs and how?

A. Many utilities do not charge for pooling, since it provides benefits to customers and the utility. For example, Ameren Illinois and Columbia Gas of Ohio have pooling programs with no cost to the supplier. On the other hand, some utilities do charge suppliers an administrative fee per pool, such as Nicor Gas which charges ~$75 per month per pool and Centerpoint North charges ~$100 per pool per month. RESA supports a reasonable monthly administrative fee to compensate the utility for its actual and reasonable

incremental costs to implement pooling. Of course, any pooling charge needs to be supported by the utility's costs data, but in my experience in other jurisdictions, such charge should not exceed $100 per month per pool.

Q. Are you proposing that pooling be mandatory for gas transportation customers?

A. No. DTE should allow customers and suppliers to have the *option* to aggregate customers into a pool. While pooling will reduce costs, and simplify the process for customers, there may be customers who prefer to keep their supply management separate. RESA proposes that the customer have the option of being aggregated into a pool. The customer can elect whether to remain standalone or join the pool, which will be set forth in their contract agreement with the supplier. The supplier would then designate the customer's decision in the customer enrollment provided to the utility. This would give customers greater flexibility than they have today, with no apparent downside to the customer, utility, or supplier.

Q. Would the utility need to implement daily balancing to implement pooling?

A. No. Daily balancing is not required to implement pooling. Several utilities, including Consumers Energy Company are monthly balanced and allow pooling. DTE can continue to offer Monthly Balancing and offer Pooling.

Q. Would pooling limit customers from purchasing gas from multiple suppliers?

A. Creating a pooling program would not prohibit customers from purchasing gas from multiple suppliers because they would not be required to participate in the program. However, for those customers that elect to participate in a pool, they would not be able to purchase gas from multiple suppliers. If a customer in a pool desires to purchase gas from multiple suppliers, then they would be allowed to leave the pool at the end of the month

and switch back to standalone service to do this. The choice ultimately lies with the customer, since pooling would be an optional service with available cost savings.

Q. Would pooling require significant restructuring of transportation contract terms and conditions?

A. No. The same contracting process should be in place with most suppliers. Further, if for some reason an individual supplier did not want to offer pooling to its customers, the supplier would not be required to pool its customers. Customers would decide if the availability of pooling is or is not a good competitive strategy by selecting or rejecting suppliers offering this service in the marketplace.

Q. What is the primary difference to customers that are pooled versus standalone?

A. The primary difference in how things work under pooling is in how customers are billed. With pooling, any imbalance between the volumes delivered and consumed by the pool are billed by the utility to the pool operator, who then invoices those customers based on actual usage. In contrast, under the current non-pooling standalone arrangement, customers are billed directly by the utility for any imbalance without any offset due to the netting effect of offsetting imbalances from other customers.

Q. Would pooling adversely affect other customers?

A. No. Pooling should have no effect, adverse or positive, on other customers. However, there might be some positive benefit since pooling can result in more accurate nominations and balancing improvements which can increase system reliability.

Q. Would pooling allow suppliers to maximize gas nominations when prices are low and minimize nominations when prices are high?

A. No. Pooling reduces the number of nominations and allows pooled customers to offset each other's imbalances while the aggregated imbalance remains unchanged. Pooling should not allow suppliers to adjust their pool nomination in response to market prices. If that were to occur, the utility could implement critical period restrictions as it does today within its non-pooling standalone arrangement.

Q. Did RESA previously recommend a pooling program for DTE?

A. Yes. In DTE's 2017 general gas rate case (MPSC Case No. U-18999), RESA sponsored witness testimony in support of a pooling option for DTE. In its September 13, 2018 Order, the Commission determined, "However, the Commission finds merit in pursuing planning for a voluntary program that could be approved in a future case. To that end, the Commission directs DTE Gas to participate in a collaborative to be convened by Consumers, with a view to formulating a pooling program for presentation in a future gas rate case."[3]

Q. Did DTE participate in that collaborative convened by Consumers?

A. I do not know, but since that time, Consumers has implemented a pooling program.

Q. Has the Consumers pooling program been successful?

A. Yes. The Consumers pooling program exhibits all of the benefits I have explained here with none of the concerns raised by DTE.

[3] Order dated September 13, 2018, MPSC Case No. U-18999, p. 121.

Q. Has DTE formulated a pooling program for consideration in a future rate case?

A. No. DTE remains opposed to a pooling option for its transportation customers.[4] DTE incorrectly asserts that a pooling program would primarily benefit gas suppliers to the detriment of sales customers, EUT customers, and system reliability.

Q. Would a pooling program adversely affect sales customers?

A. Suppliers should incur fewer imbalance fees under a pooling program and imbalance fees are credited to other sales customers. Imbalance fees, which act as a penalty for improper balancing, are credited to other sales customers, so those customers may see a reduction in that credit. However, if the credit is reduced, it is because of the improvement in balancing, which is better for reliability and operational integrity. If there is no actual supplier imbalance, due to netting of customer imbalances, then an imbalance fee is unjust and unwarranted.

Q. Would a pooling program adversely affect transportation customers?

A. No. Transportation customers would have the option, not the obligation, to participate in a pooling program. These are sophisticated customers able to assess the benefits of a pooling option themselves. As noted above, these customers will benefit from the additional optional service, as well as reduced transportation expenses for those that choose to participate.

Q. Would a pooling program adversely affect system reliability?

A. No. Pooling programs have existed for many years, including for other Michigan utilities, with no adverse effects on system reliability. Instead, in my opinion, pooling can actually improve system reliability. For example, during an Operation Flow Order (OFO), we are

[4] See, Discovery Response RESADG-1.1, attached Exhibit RES-1 (DHU-1).

required to maintain stricter balancing tolerances. This is much easier to do in pooling because there are fewer pools than standalone customers, resulting in better balancing and fewer imbalance fees.

Q. Why should DTE implement a pooling program now?

A. More and more gas transportation programs have adopted pooling, making DTE increasingly among a minority of gas programs that do not have pooling, both in the region and in Michigan. DTE itself currently offers an aggregation of accounts to customers on their system that have common ownership. DTE allows these customers to have a master account and subsidiary accounts are all treated as one account for nominations and balancing, including penalty calculations. In essence, this aggregation is a form of pooling, but it is only available to certain DTE customers with subsidiary accounts.

Q. What do you recommend for DTE to implement pooling?

A. I recommend the Commission order DTE to modify its tariffs to implement a pooling option for gas transportation customers. Pooling is a common industry practice that improves options for customers with little to no apparent downside. Specifically, DTE should be required to:

(1) Accept pooled nominations from suppliers

(2) Calculate and assess any load balancing charges based upon the net imbalance of a supplier's pool;

(3) Calculate and assess any authorized and unauthorized gas usage charges based upon the net imbalance of a supplier's pool;

(4) Calculate and assess excess pipeline costs surcharge based upon the net imbalance of a supplier's pool;

(5) Establish the Pool Authorized Tolerance Level ("PATL") as the sum of all the individual pool member Annual Contract Quantity ("ACQ") times 10% or, when appropriate, the percentage of ACQ Tolerance Level as selected by the pool member; and (6) Establish the pool monthly injection rights as the corresponding sum of the rights of the individual pool members under existing tariff limits.

Q. Do you have any specific tariff recommendations?

A. Yes. In Section E1.1 of DTE Gas' tariff, I suggest that the following definitions be added:

- "Pool" or "Pooling" shall mean the grouping together of transportation customers for the purposes of netting daily and monthly imbalances, nominations, and storage balances.
- "Pool Administrator" shall mean the 1 person or entity whom the transportation customer has authorized to take actions and make decisions on their behalf with regard to the operation of a Pool.
- "Pool Contracted Storage" (PCS) shall mean the sum of the pool member ACQs times 10% (or times the percentage of ACQ Tolerance Level when a different value is selected by the pool member).

At Section E2.2, I recommend adding the following statement:

- F. If the transportation customer has authorized a Pool Administrator, the Daily Nomination submitted by the Pool Administrator will be for the Pool as a whole. The Pool Administrator must notify the Company in writing three business days prior to the beginning of each calendar month as to which meters will be members of the Pool. A transportation customer must remain in a Pool for a period of one calendar month unless

its transportation service is discontinued during that calendar month and cannot be a member of more than one Pool at any one point in time.

First Revised Sheet No. E-16.00 under Selection of Service Category and Rates should be amended as follows:

- For any transportation customer that is part of a Pool, any Unauthorized Gas Usage Charges will be applied to the imbalance remaining after the netting of imbalances from all Pool members. The Pool Administrator will be responsible for determining how any charges or credits remaining will be divided among Pool members. By the third working day of each month, the Company will provide the Pool Administrator with Pool member usage information from the prior month.

First Revised Sheet No. E-17.01, the Unauthorized Gas Usage section should be amended as follows:

- C. For any transportation customer that is part of a Pool, any Unauthorized Gas Usage Charges will be applied to the imbalance remaining after the netting of imbalances from all Pool members. The Pool Administrator will be responsible for determining how any charges or credits remaining will be divided among Pool members. By the third working day of each month, the Company will provide the Pool Administrator with Pool member usage information from the prior month.

The Load Balancing Storage and Charges section of Third Revised Sheet No. E-18.00 should be amended as follows:

- E. For any transportation customer that is part of a Pool, the $.25 per MMBtu per Month charge plus fuel for injection, for any month-end balance of gas will be assessed based upon the gas that exceeds the Pool Contracted Storage (PCS) plus the sum of the

contract storage quantities that Pool members have individually contracted for. For a Pool, for any monthly withdrawals from storage during the months of December through March will be limited to the 3% of the sum of the Pool member's ACQ. For a Pool, for any monthly injections during the months of September through November that are in excess of the sum of the Pool members ACQ times 1.43%, plus the sum of the contact storage quantities that Pool members have individually contracted for, a $0.25 per MMBtus charge, plus 1.43% retailed as fuel, will be assessed.[5]

Q. Do you have any final transportation program recommendations?

A. Yes. I recommend that DTE allow customers to switch suppliers with a 10-business day notice to the utility.

Conclusion

Q. Please briefly summarize your conclusions and recommendations.

A. My conclusions and recommendations are as follows:

- DTE does not currently offer its transportation customers a pooling option, which makes DTE an outlier among regional and other Michigan gas utilities.
- A pooling option can reduce supplier overhead costs, reduce costs for transportation customers, and improve system reliability.
- The Commission should direct DTE to implement a pooling program.

Q. Does this conclude your direct testimony?

A. Yes.

[5] For imbalances remaining after pooling has been applied, charges may be either billed directly to the Pool Administrator or billed directly to the end-use transportation customer based upon allocation of those charges as provided to the utility by the Pool Administrator. Each of these methods is used in different utility jurisdictions that currently offer pooling. RESA's preference is to receive the bill for these charges directly from the utility.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, of the application of DTE GAS COMPANY for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of natural gas, and for miscellaneous accounting authority.	))))))	Case No. U-21973

EXHIBIT LIST OF
RETAIL ENERGY SUPPLY ASSOCIATION

Exhibit RES-1 (DHU-1) Discovery Response RESADG-1.1

Date: March 13, 2026

MPSC Case No: U-21973

Requester: RESA

Question No.: RESADG-1.1

Respondent: J. L. Huffman

Page: 1 of 1

Question: Does DTE offer a pooling option for transportation customers? A pooling option would permit a gas supplier to aggregate the receipts and deliveries of gas transportation customers taking service under DTE's gas transportation service by establishing a group or pool with those transportation customers who have agreed to participate in the program. If yes, please identify where this option exists in DTE's transportation program. If no, please explain why DTE does not provide this option.

Answer: No, DTE Gas does not offer a pooling option for End-Use Transportation (EUT) customers.

A pooling program has previously been proposed by RESA and a third-party supplier in Cases U-15985 and U-18999. In both proceedings, the Commission declined to require DTE Gas to implement such a program.

Pooling would primarily benefit gas suppliers to the detriment of sales rate customers, EUT customers, and could adversely impact system reliability. By aggregating EUT customers, a supplier could leverage DTE Gas's monthly storage balancing provisions to arbitrage physical gas supply—effectively increasing or decreasing flowing gas volumes in a manner not available when managing the same customers individually. This could introduce additional operational risk to DTE Gas's system.

Attachment: None

STATE OF MICHIGAN

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In the matter, of the application of DTE GAS COMPANY for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of natural gas, and for miscellaneous accounting authority.	))))))	Case No. U-21973

CERTIFICATE OF SERVICE

Jennifer Heston hereby certifies that, on the 13th day of March 2026, she served the Direct Testimony and Exhibit of Dawn Huth on behalf of the Retail Energy Supply Association, an exhibit list, and this Certificate of Service upon the persons identified on the below service list by electronic mail.

/s/ Jennifer Heston
Jennifer Heston

Jennifer U. Heston
Digitally signed by Jennifer U. Heston
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