STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter, on the Commission's own motion, to open a docket for certain regulated electric utilities to file their distribution investment and maintenance plans and for other related, uncontested matters.	))))))	Case No. U-20147

At the April 30, 2026 meeting of the Michigan Public Service Commission in Lansing, Michigan.

PRESENT: Hon. Daniel C. Scripps, Chair
Hon. Katherine L. Peretick, Commissioner
Hon. Shaquila Myers, Commissioner

ORDER

History of Proceedings

On September 8, 2022, the Commission issued an order in this case (September 8 order) directing Alpena Power Company (Alpena) and Northern States Power Company, a Wisconsin corporation (NSP-W) to file their first set of distribution system plans (DSPs)[1] by 5:00 p.m. (Eastern time (ET)) on September 30, 2024, and pursuant to a settlement agreement approved by the Commission in the March 24, 2023 order in Case No. U-21286, Upper Peninsula Power Company (UPPCo) was directed to file its first DSP by 5:00 p.m. (ET) on January 31, 2025.

[1] DSPs were previously referred to by the Commission as distribution investment and maintenance plans or distribution plans (and by the utilities as different names altogether). For consistency, for ease of discussion, and because DSP is a common industry standard used by the U.S. National Laboratories, the Commission recently adopted DSP as the naming convention for all distribution plans moving forward. *See*, July 10, 2025 order in this case (July 10 order), p. 30.

On September 30, 2024, Alpena and NSP-W filed their first DSPs, and on January 31, 2025, UPPCo filed its first DSP. In the July 10 order, the Commission acknowledged these filings, provided an opportunity for interested persons to submit comments on the filed DSPs and replies thereto, and adopted a protective order for use in connection with the filing of DSPs moving forward. *See*, July 10 order, pp. 2, 30-32. The Commission also set forth the due dates for Alpena, NSP-W, and UPPCo to file their next DSP filings in a new docket, consistent with the July 10 order and the new DSP filing guidelines (2025 guidelines). *See*, July 10 order, p. 33.

On August 29, 2025, the Commission Staff (Staff) filed comments on Alpena's DSP, and on September 30, 2025, Alpena replied.

On September 30, 2025, the Staff filed comments on NSP-W's DSP, and on October 30, 2025, NSP-W replied.

On October 30, 2025, the Staff filed comments on UPPCo's DSP. No response was filed.

Comments and replies mentioned above are summarized below, with Commission discussion and guidance thereafter.

Comments and Replies

1. Alpena Power Company's Distribution System Plan

The Staff states that it evaluated Alpena's DSP and, as part of its overview, found that the company's DSP generally met the DSP requirements set forth by the Commission prior to the time the DSP was filed. The Staff states it found that Alpena's proposed projects reflect an informed investment strategy but notes that the investments are still subject to review in the company's next rate case. The Staff further states that it:

> appreciates the comprehensive data review and transparency provided by Alpena. The Company's dedication to asset planning, system health, and long-term SAIDI [system average interruption duration index], SAIFI [system average interruption frequency index], and CAIDI [customer average interruption duration index] data for the next 20 years demonstrates a commitment to system strength and performance. Further, Staff appreciates the Company's presentation of its reliability, weather patterns, and equipment loading. The straightforwardness and data-forward presentation of Alpena's history, operations, and general trajectory within its plan offer a valid reference for what to include in plans. Alpena shows diligence in selecting the correct equipment and methods of operating, maintaining, and proactively replacing failed components before failures would affect its system. This is demonstrated by their porcelain cutout program, non-PCB [polychlorinated biphenyls] transformer replacement program, and undergrounding work as described further in this document. Detailed attention is also paid to transformer and circuit loading to ensure a proactive approach and solutions. Additionally, Staff appreciates the transparency that long-term data provides for understanding system condition, service quality, and reliability improvements.
>
> Overall, the Company shows that it values a data-driven approach in its planning efforts which, in turn, supports Staff and interested party understanding of the system more in-depth than narrative can alone.

Staff's comments to Alpena's DSP, p. 4 (based on natural order following the cover page). The Staff thereafter specifically comments on the topics of data sources and forecasting, moving overhead distribution lines to underground, the company's pole testing program, meter infrastructure investments, and community and customer engagement.

For data sources and forecasting, the Staff, in consideration of the 2025 guidelines, states that it would be interested in reviewing the raw data behind the information (i.e., inputs, model equations, and statistical tests) presented by Alpena to produce and evaluate the company's energy and peak demand forecasts (both coincident and non-coincident) within the company's next DSP. The Staff also remarks on data that the company did and did not provide, highlighting that the company "notes that while the worst MIEJScreen scored areas tend toward better reliability, the Company believes that to be a result of the rural/urban divide of electricity." Staff's comments to Alpena's DSP, p. 5. Addressing environmental justice (EJ), distributed energy resources (DERs),

electric vehicles (EVs), and other forecasting topics, the Staff states that it "would [also] be interested to see more discussion on actions or planned solutions [beyond analysis] following forecast trends in the Company's next DSP." *Id*. Despite low enrollment in Alpena's Distributed Generation (DG) and Legacy Net Metering program and fairly minimal penetration of overall DERs on the company's system, the Staff states that it is curious about the program, other options or alternatives to leverage DER technology in the future, and the effect of these on the company and its future spending.

As to converting overhead distribution lines to underground, the Staff states that it is not clear where this has occurred on Alpena's system or where the company plans to do this work in the future. The Staff would thus "like to learn more about how the Company is exploring overhead to underground conversion, what considerations and methods are applied in the decision-making process, and the future plan to convert areas of its system in this manner." *Id*., p. 6. The Staff, in this context, also mentions this topic as discussed in the June 12, 2025 order in Case No. U-21388 and states that it looks forward to the outcomes of the undergrounding workshop ordered in that case, along with more detail on this topic in future DSPs.

With regard to Alpena's pole testing program, the Staff notes the company's current 14-year pole testing cycle and recommends that the company work towards a 10- to 12-year pole testing cycle, maintain standard operating procedures recommended by the Staff in a 2010 report and by The Liberty Consulting Group (Liberty) in Case No. U-21305, and include future inspection plan details in the company's next DSP filing. Staff's comments to Alpena's DSP, p. 7.

As to meter infrastructure investments, the Staff notes Alpena's current automated meter reading (AMR) technology on the system and the company's plans for future infrastructure investments beginning in 2031 but cautions, prior to this time, that:

> there are many important considerations to ensure that the right investment is made. Staff understands there are many potential customer benefits offered through AMI [advanced metering infrastructure] technologies such as usage data, voltage data, and outage restoration verification; however, Staff challenges the Company to carefully consider the information and data it plans to use and what it will be used for as it approaches this important investment decision. In its next distribution plan or rate case, assuming an investment will be made, Staff encourages the Company to provide a breakdown of the benefits the new proposed technology offers and compare those to benefits the Company plans to leverage. Any benefit offered that is not utilized is a portion of the expenditure that offers no benefit to customers which negatively impacts the business case. The Company should also provide alternative options, including AMR, and explain why the preferred option was chosen; how the Company is planning for potential cellular [network] obsolescence with the avoidance of a mesh network; and projected cost savings for areas like meter reading, storm restoration, and remote connections/disconnections.

Id., pp. 7-8.

Addressing community and customer engagement next, the Staff commends Alpena's outreach conducted via the company's community and customer engagement survey, despite its low response rate. Per the Staff, "[g]reater awareness surrounding the Company and its system, coupled with a more concerted outreach effort aimed to hear from more customers, will hopefully lead to a more robust collection of customer feedback [for the company] to be more thorough in identifying problems and inform decisions." *Id*., pp. 8-9.

The Staff then concludes with a summary of its recommendations for Alpena moving forward:

> 1. Staff recommends that the Company apply the 2025 guidelines and any other subsequent guidance from the Commission in its future plan filings.
>
> 2. Staff recommends that the Company provide a discussion around actions or planned solutions as a result of forecasting trends, including the DG and Legacy Net Metering Program impacts, in the Company's next DSP.
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> 3. Staff recommends that the Company offer further explanation to its overhead to underground conversion and overall undergrounding strategy in its next DSP, including what considerations and methods are applied in the decision-making process to underground and any future plans to convert areas of its system.

4. Staff recommends that the Company work towards a 10-12 year pole testing cycle or explain why a 14-year cycle is the best option for customers in the Company's next DSP.

5. Staff recommends that the Company, if a new metering infrastructure is pursued for the 2029 budget, provide a breakdown of the benefits the new proposed metering infrastructure technology offers and compare those to benefits the Company plans to leverage in future rate cases and DSPs. Further, the Company is encouraged to detail alternative options and support for why the preferred option was selected, how the Company is planning for cellular [network] obsolescence, and cost savings associated with the preferred option in areas such as meter reading, storm restoration, and remote connections/disconnections.

6. Staff recommends that the Company apply a more concerted outreach effort aimed to solicit feedback from more customers to identify problems and, ultimately, help deliver solutions and inform Company decisions.

Id., pp. 9-10.

In response, Alpena addresses each topic area and recommendation from the Staff, beginning with data sources and forecasting. Alpena states that, while it "agrees that additional data and analysis can provide insight into specific topics, both the cost and benefits of the analysis should also be considered, especially with topics that have limited customer participation," noting that "[a]s one of the smallest investor-owned utilities [IOUs] in the State, Alpena has limited resources and a relatively small number of customers that all share in the cost of data analysis and forecasting." Alpena's response, p. 2 (based on natural order following the cover page).

As to converting overhead distribution lines to underground, Alpena expresses appreciation for the Staff's comments and efforts to explore undergrounding as a reliability and resiliency solution and states that it looks forward to the technical workshops and ways to collaborate on next steps on this issue. *Id*.

With regard to its pole testing program, Alpena states that it does not disagree with the Staff's recommendation. *Id*.

As far as meter infrastructure investments, Alpena states that it acknowledges the Staff's comments and "agrees that this is a significant investment that will have a long-lasting impact on the Company and its customers and should be thoroughly analyzed." *Id*., p. 3.

With community and customer engagement, Alpena states that it agrees that this type of outreach provides valuable insight into system planning and does not disagree with the Staff's recommendation. *Id*.

Finally, addressing each of the Staff's recommendations, Alpena notes no additional comments on Recommendation Nos. 2-5 but states, with regard to Recommendation No. 1, that:

> [t]he Company agrees to evaluate the 2025 guidelines and any other subsequent guidance from the Commission in its future plan filings, but as a small utility with limited resources believes that each addition to DSPs should be evaluated to ensure the cost associated with the additional analysis is justified by the benefit to the DSP.

Id., p. 3.

2. Northern State Power Company's Distribution System Plan

The Staff states that it evaluated NSP-W's DSP and, as part of its overview, found that the company's DSP generally met the DSP requirements set forth by the Commission prior to the time the DSP was filed. The Staff states it found that NSP-W's proposed projects are consistent with the company's rate case testimony in Case Nos. U-21097 and U-21565. The Staff states, however, that it:

> is alarming that information is omitted from the DSP discussion and a general "high-level" overview is presented. Staff recognizes the difficulty of balancing a system synopsis with explicit details, but it is critical for a DSP to include data, not only narrative, to support this rate case testimony and provide context to the overall system needs and objectives. As an example, the Company states several times throughout its plan that aging infrastructure is an issue yet offers no detail on the age of its assets unless the equipment is already assigned to a project. A breakdown of the ages of various assets in the system would be helpful in putting the issue into perspective and understanding what is needed to deliver a solution before assets are already assigned to a project.

Staff's comments to NSP-W's DSP, p. 4 (based on natural order following the cover page). On this point, the Staff acknowledges the company's small footprint in Michigan but also highlights that the company is a subsidiary of Xcel Energy, which serves several million customers through its subsidiaries across the United States. Noting the importance of grid planning efforts, the Staff expresses its hope for a more detailed and careful examination of NSP-W's Michigan distribution system with data in the company's next DSP.

From there, the Staff specifically comments on topics regarding DSP and rate case similarities, forecasting, affordability and cost-effectiveness, benefit/cost analysis (BCA) and alternatives, EJ, vegetation management, outage causes, meter infrastructure investments, projected reliability metrics, and community and customer engagement. *Id*., pp. 5-13.

On the topic of DSP and rate case similarities, the Staff states that NSP-W's DSP "seems derived from its prior rate case" in Case No. U-21565, which was filed in July 2024 and settled in December 2024. *Id*., p. 5. Without knowing which data most accurately represents the company's planning efforts, the Staff states that it:

> is difficult . . . to fully comment on the minutiae of the plan. The rate case contains the majority of [the] information the Company provided within the DSP with some additional detail in the DSP regarding planning information. It is imperative that the Company use the DSP to communicate its planning efforts and future investment strategies rather than state what is in the rate case. The DSP should contain the guiding trends and support for continued long-term distribution system advancement as well as the reasoning and data that supports its plan. The DSP and rate case have different functions with the rate case being the avenue for cost recovery while the DSP is the avenue to communicate the future investment strategy with continuity to the rate case that offers support for cost recovery in the rate case.

Id.

On forecasting, the Staff states that, despite information provided in Section V.A. of the DSP and discussion on current EVs and DER customers in the company's service territory, the Staff

would be interested in more discussion on future actions/planned solutions following forecast trends in NSP-W's next DSP, including those beyond just five years as set forth on pages 4-5 of the September 11, 2019 order in this docket and the 2025 guidelines. The Staff further provides that:

> [i]n future plans, the Company should provide all of the information and data required by the Commission in its July 10 Order. The "bottom-up" circuit level forecasts provided with the DSP should comport with the "top-down" system level forecasts in the rate cases, integrated resource plans, and power supply cost recovery [PSCR] plans submitted before the Commission. Staff encourages the Company to consider evaluating various load forecast scenarios in future planning efforts as suggested in the 2025 guidelines, such as a base case and additional low, and high building and transportation electrification scenarios as able. Whatever method NSP-W chooses to use in its evaluation, it should align and agree with all its other planning efforts.

Staff's comments to NSP-W's DSP, p. 6.

As to affordability and cost-effectiveness, the Staff states that NSP-W's DSP only references affordability twice at a high level and lacks understanding of how affordability is being considered by NSP-W in the company's investments and planning efforts. The Staff, in this context, mentions affordability and cost-effectiveness as one of the four objectives listed in the October 11, 2017 order in Case Nos. U-17990 and U-18014 (October 11 order) and expresses concern over NSP-W's lack of transparency on how the company addresses affordability for its customers. The Staff states that:

> [t]he [BCA] section of the plan is an indication that the cost-effectiveness of certain investments are being explored, yet Staff would like to see more detail on how affordability is integrated into the DSP in future filings, detailing which projects are cost effective, alternatives that were considered, and how the Company will ensure affordable rates for the future.

Staff's comments to NSP-W's DSP, p. 7.

On BCAs and alternatives, the Staff expresses appreciation for the BCA section included in the company's DSP[2] and states that a BCA is a decision-making tool that appears to be used by NSP-W for certain investments, including AMI. The Staff references pages 73-74 of the September 8 order for discussion on BCAs and notes that, while NSP-W's DSP emphasizes the company's plan to harden the grid, the DSP includes no analysis showing how hardening compares to other alternatives, which the Staff asserts is important to understand. The Staff further notes that:

> undergrounding projects are only mentioned in the context of new business on page 34 and are claimed to be "contemplated" on page 38 of the plan with limited detail. Staff encourages the Company to be more transparent with its [BCA] approach and alternatives considered by showing alternatives to hardening and other reliability and resilience investments. Given that 94 of the 470 miles (20%) of the system is underground, there may be an opportunity to expand the Company's underground infrastructure in a cost-effective manner.

Staff's comments to NSP-W's DSP, pp. 7-8. The Staff also brings attention to the company's assertion that the AMI BCA is confidential in nature and encourages NSP-W to provide these details, noting the protective order attached as Exhibit B to the July 10 order to protect this and other types of confidential information.

On the topic of EJ, the Staff notes that NSP-W provided socioeconomic data using the Climate and Economic Justice Screening Tool (CEJST), which shows that "half of the census tracts in the Company's territory are disadvantaged communities and six out of the total eight have an energy burden score over 80;" however, the Staff states that this information was not expanded upon and was the only reference to EJ in the DSP. While the Staff appreciates NSP-W's use of reliable federal data to show socioeconomic information, the Staff encourages use of the MiEJScreen tool

[2] The actual title of this section in NSP-W's DSP is called Cost-Benefit Analysis Feasibility. For consistency with long-standing terminology at the Commission, however, the Commission refers to a cost-benefit analysis as a BCA.

should the CEJST data become outdated or difficult to utilize, also noting the desire for socioeconomic information to be overlayed with investment locations per the September 8 order. The Staff, in this regard, "recommends the Company include a discussion on disadvantaged communities in the Company's territory alongside socioeconomic data, focusing on investment locations and other topics outlined in Staff's guidelines in its future DSP filings." Staff's comments to NSP-W's DSP, p. 9.

With vegetation management, the Staff highlights the tree canopy density of over 64% in the company's service territory; that, "[a]side from intentional outages, vegetation has been the main average outage cause for the past five years, including major event days (MEDs);" and that the company utilizes risked-based scheduling for its tree trimming cycle (ranging from 3- to 7-year overall cycles). *Id*. The Staff, however, notes that the DSP contains little to no detail on tree trim specifications applied to circuits. The Staff also expresses concern that:

> "92 percent of the vegetation events were not preventable" in 2023. Staff understands the importance of strengthening the system to better withstand vegetation contact and other external forces but is concerned that current trimming practices may not be sufficient for the service territory's needs. Staff needs more trimming specification details to properly assess the Company's current trimming program. Staff recommends the following for the Company in its next rate case and DSP: provide more details on vegetation management, including tree trim specifications; analyze if more aggressive trimming practices (cycles and specifications) could reduce outages caused by vegetation and the associated costs; and provide a detailed outline of the Company's risk scoring model for transparency.

Id., pp. 9-10. While the Staff states its understanding that the high amount of vegetation in the company's service territory in Michigan poses a complex problem, the Staff equally states that it is not convinced that capital programs are the only solution to improve system performance, noting modified vegetation management practices as a possible cost-effective solution.

On the topic of outage causes, the Staff highlights NSP-W's recognition that the majority of the company's outages occur on or downstream from distribution taps/laterals consisting of smaller wires and poles, leading to vegetation impacts being the leading cause of outages. What concerns the Staff, however, is that:

> the second leading cause of outages, when considering customer minutes out (CMO), is labeled as "Unknown" and the fifth as "Environment." Although Staff realizes the necessity to safely and quickly restore outages, proper classification of these reported outage codes can fall by the wayside. Staff nevertheless echoes what was also pointed out by the Liberty Consulting Group - the notion that certain cause labels diminish the effectiveness of the analysis of outage causes necessary to identify and optimize solutions to address them.

Id., pp. 10-11. The Staff thus recommends that NSP-W reduce the general outage causes and recategorize its cost codes to ensure cause analysis that will allow the company to determine meaningful measures to address them and to inform future planning strategies.

With regard to meter infrastructure investments, the Staff highlights grid modernizing investments in the company's most recently concluded rate case via settlement agreement in Case No. U-21565, including upgrading from an AMR system to an AMI system with corresponding meters in 2025. However, per the Staff:

> the settlement agreement in the rate case makes no mention of AMI recovery outside of an AMI opt-out provision under 6.F. The plan to deploy AMI in 2025 does align with the Company's AMI strategy presented in the DSP. Given the AMI technology was not authorized for recovery in a previous rate case and the Company has made the decision to deploy AMI in 2025, which will likely be part of the historic or bridge year spend in the next rate case, Staff encourages the Company to provide specific details to support the investment. AMI offers several benefits such as usage data, voltage data, and outage verification; however, Staff challenges the Company to carefully consider the information and data it plans to use and what it will be used for. It should be noted that NSP-W's definition of AMI would be colloquially referred to as AMI 2.0, since the meters will include the Distributed Intelligence ("DI") platform. In its next rate case, assuming an investment is being made beginning in 2025, Staff encourages the Company to provide a breakdown of the benefits the new proposed technology may be able to offer and compare those to benefits the Company plans to leverage. Any benefit that is offered and not utilized is a portion of the expenditure that offers no

> advantage to customers, which negatively impacts the business case. The Company should also provide alternative options considered, including keeping its automated meter reading (AMR) infrastructure, and explain why the preferred option was chosen; how the Company is planning for potential cellular [network] obsolescence through the planned FAN [field area network] wireless mesh network; and projected cost savings for areas including but not limited to meter reading, storm restoration, and remote connections/disconnections.

Staff's comments to NSP-W's DSP, pp. 11-12.

On projected reliability metrics, the Staff states that NSP-W did not include these or reliability improvements with any of the company's proposed planning actions in its DSP. While projections can never be perfectly accurate and while NSP-W provided tables with five years of SAIDI, SAIFI, and CAIDI metrics, along with a five-year average of outage causes, the Staff avers that estimated forecasts can nevertheless add context to the company's goals and that the lack of quantification provided by the company provides little support for its future projects and goals. The Staff thus states that, in the future, it "would be interested to see more delineated estimates on how reliability metrics would be impacted via various reliability improvement efforts put forth by the Company, through metric projections." *Id*., pp. 12-13.

Lastly, the Staff addresses community and customer engagement, and, while acknowledging the discussion of community input in the company's DSP, the Staff nevertheless encourages NSP-W to provide more detail on this (i.e., the problems, goals, and potential solutions because of these community interactions) in the company's next DSP. In support, the Staff reiterates the topic of accessibility as one of four objectives from the October 11 order and also references the "Third Party and Community Outreach" section in the 2025 guidelines. The Staff further recommends that NSP-W provide "detailed information regarding the Company's dedication towards customer engagement, including how the Company identifies 'key personnel', whom 'key personnel' encompass, and examples of how the company has listened to community perspectives

on projects in future DSP filings and worked to identity issues and solutions through its engagement efforts." Staff's comments to NSP-W's DSP, p. 13.

The Staff then concludes with a summary of its recommendations for NSP-W moving forward:

> 1. Staff recommends the Company apply the 2025 guidelines and any other subsequent guidance from the Commission in its future plan filings.
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> 2. Staff recommends the Company offer a more detailed and careful examination of the Michigan system with data in its next DSP.
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> 3. Staff recommends that the Company provide a discussion around actions or planned solutions, if applicable, as a result of forecasted trends in the Company's next DSP. Staff also recommends the Company consider evaluating various load forecast scenarios in future planning efforts as suggested in the 2025 guidelines, such as a base case and additional low, and high building and transportation electrification scenarios as able.
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> 4. Staff recommends the Company integrate affordability into future DSP filings detailing which projects are cost effective, alternatives that were considered, and how the Company is ensuring affordable rates for the future. Further, the Company shall place a stronger emphasis on affordability transparency by explaining how it considers affordability and cost-effectiveness for its customers beyond narrative in the next DSP filing.
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> 5. Staff recommends the Company consider undergrounding existing overhead infrastructure and offer more transparency into the [BCAs] performed along with alternatives considered to prove that hardening and other investment decisions are the most reasonable path forward.
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> 6. Staff recommends the Company include a discussion on disadvantaged communities in the Company's territory alongside socioeconomic data, focusing on investment locations and other topics outlined in Staff's guidelines in its future DSP filings.
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> 7. Staff recommends the Company provide, in its next rate case and DSP, more details on vegetation management including 1) vegetation management tree trim specifications; 2) analysis to determine if more aggressive trimming practices (cycles and specifications) could reduce outages caused by vegetation and the associated costs; and 3) provide a detailed outline of the Company's risk scoring model for transparency.

> 8. Staff recommends the Company reduce the use of general outage causes such as "Unknown" and "Environment" and re-categorize cause codes to ensure the ability to analyze causes that allow the Company to determine meaningful measures to address them and inform future planning strategies.
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> 9. Staff recommends that the Company provide, as part of its next rate case, a breakdown of the benefits the new proposed metering infrastructure technology offers and compare those to benefits the Company plans to leverage in future rate cases and DSPs. Further, the Company is encouraged to detail alternative options and support for why the preferred option was selected, how the Company is planning for cellular [network] obsolescence through the planned FAN wireless mesh network, and cost savings associated with the preferred option in areas including but not limited to meter reading, storm restoration, and remote connections/disconnections.
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> 10. Staff recommends the Company provide detailed information regarding the Company's dedication towards customer engagement in future DSP filings.

Staff's comments to NSP-W's DSP, pp. 13-15.

In response, NSP-W overall states that it is committed to improving its DSP and corresponding process and would thus like to have continued discussions and to collaborate with the Staff to understand and make improvements before the company files its next DSP. NSP-W does, however, express concern with the ability to provide some of the additional details recommended by the Staff considering the company's service area and value/affordability concerns. As the Commission thus considers the Staff's recommendations, NSP-W underscores that:

> changes to reporting requirements often cause additional costs including additional Company employee time to create system changes to report this information, costs to upgrade information technology systems, or Company or Staff time to review and manage the reporting requirements. These increased costs incurred by the Company to comply with the reporting requirements are ultimately recovered through the Company's electric base rates from [its] Michigan customers.

NSP-W's response, p. 2.

Responding to the Staff's recommendations specifically, NSP-W first addresses application of the 2025 guidelines to future DSPs and states that, while it will plan to incorporate these

guidelines and any future Commission directives into subsequent DSP filings, there may be circumstances where details are not available or are cost-prohibitive to obtain and provide. NSP-W would thus like to discuss with the Staff how to best comply with such requirements or seek waivers. NSP-W further contends, as the smallest IOU in Michigan, that "each addition to DSPs should be evaluated to ensure the cost associated with the additional analysis is justified by the benefit to the DSP as one of the overarching objectives of the DSP is to be cost-effective and affordable." NSP-W's response, p. 2.

As far as detailed data and reliability metrics, NSP-W acknowledges the value of information and, although its service area is small and asset age data is currently provided for equipment assigned to projects, states that it will attempt to provide more granular data in its future DSPs. NSP-W further states that:

> [r]eliability metrics (SAIDI, SAIFI, CAIDI) are reported historically; future filings will consider including estimated impacts of reliability improvement efforts, as feasible, while noting the limitations of projections in a small distribution system and cost associated with providing this data. Additionally, the Company will focus efforts on providing more granular information and data in the DSP as compared to the more high-level information and narrative supplied in the rate case.

Id., p. 3.

With forecasting trends, NSP-W notes that, while its Michigan load "has not changed significantly in recent history, is not expected to change significantly, and electrification trends remain minimal," it will nevertheless monitor for signs of significant electric load growth and will provide expanded forecasting and scenario analysis in its future DSPs, to the extent warranted. *Id*. At present, however, NSP-W states that "extensive forecasting is burdensome, costly[,] and not justified by current trends," and, while the company agrees that this additional information can provide insight for certain topics, "both the cost and benefits of the analysis should also be considered, especially with topics that have limited customer participation and with only

9,000 electric customers that would share in this cost of data analysis and forecasting." *Id*., pp. 3-4.

As to affordability and cost-effectiveness, NSP-W states that it "is committed to affordability for its customers as noted in some of the comments in this document where additional reporting requirements would come at a cost to NSP-W customers," specifically noting for demand response in addressing affordability that it "utilizes third-party programs and does not directly oversee expenditure allocation." *Id*., p. 4.

For BCAs and alternatives, NSP-W specifically notes that it "performs targeted undergrounding where cost-effective but generally finds it less economical than other solutions." *Id*. The company further states that its filed DSP "provides a clear rationale for the Company's approach to [BCAs] and describes where [BCAs] are performed" and that it "will continue to evaluate undergrounding opportunities and alternative analyses where applicable in future filings." *Id*.

With EJ, NSP-W states that it appreciates the importance of this topic, will expand its socioeconomic data of disadvantages communities in future DSPs, and will utilize the CEJST and MiEJScreen tools as recommended. *Id*., p. 5.

For vegetation management, NSP-W acknowledges the practice as a key reliability factor, noting that its DSP "provides substantial detail on vegetation management, including cycle intervals, risk scoring, and the challenges posed by tree density and invasive species." *Id*. NSP-W further states that it "will continue to refine and report on these practices, including leveraging grant opportunities for expanded vegetation management." *Id*.

With regard to outage causes, NSP-W states that it is internally working to update cost codes, which may improve outage-cause analysis in future filings. NSP-W notes, however, that its

"process and outage cause codes are consistent across Xcel Energy's eight states, so system limitations may impact those efforts." *Id*.

As far as meter infrastructure investments, NSP-W states that:

> [a]s typical with the Company's settlement agreements in Michigan, recovery of each investment is not detailed in settlement, but the settlement agreement [contains] higher level indications of recovery amounts. Additionally, the Settlement Agreement in Case No. U-21565, as approved by Commission Order on December 19, 2024, notes in item 6.B. that the Company will not seek recovery of legacy meter net plant-in-service amounts as the legacy meters would be retired with new meters deployed and item 6.F. addresses AMI opt-out provisions. Additionally, the NSP-W's DSP provided a comprehensive overview of Advanced Grid Intelligence and Security ("AGIS") investments, including AMI. The DSP explains the benefits of AMI for outage management, customer service, and system efficiency, and describes the planned deployment in 2025 (which is on schedule). It also discusses integration with other grid modernization technologies. However, the Company is willing to provide the AMI details again in the Company's next electric rate case if the Commission agrees with Staff's comment that "the AMI technology was not authorized for recovery in the previous rate case [Case No. U-21565]" and future DSPs which will occur after deployment is complete.

Id., p. 6.

Lastly, addressing community and customer engagement, NSP-W states that it "is committed to customer engagement and will comply with Staff's recommendations by providing more detailed information on engagement efforts, key personnel, and community feedback in future DSPs." *Id*., p. 7.

Concluding, NSP-W reiterates its commitment to continuous improvement in distribution planning but maintains that the DSP requirements ordered by the Commission should balance a utility's size and value/affordability considerations for customers. *Id*.

3. Upper Peninsula Power Company's Distribution System Plan

The Staff states that it evaluated UPPCo's DSP and, as part of its overview, found that the company's DSP generally met the DSP requirements set forth by the Commission prior to the time the DSP was filed. The Staff states it found that UPPCo's proposed projects reflect an informed

investment strategy but notes that the investments are still subject to review in the company's next rate case. The Staff further states that it:

> appreciates the data review and transparency provided by UPPCO, especially the inclusion of appendix material. However, there are specific areas of the plan where Staff would like to see more detail as discussed in these comments. Appendix 6, includes some projected spending details; however, it is not clear where the various programs described earlier in the plan fit into these categories and the makeup of their expenditure. On page 46, the Company outlines various programs (pole replacements, line rebuilds, porcelain cutout replacement program, copper conductor replacement program, etc.) under the asset renewal title, but there is no mention of how much the Company plans to spend in each of these respective programs in the future. Similarly, on page 61, grid modernization is explained with various grid modernization technologies, but the investment strategies and future costs are not transparent. Although the supplied plan offers a general sense of the Company's system, Staff would like to see more granularity on future spend plans and strategy. Further, the Company cites aging infrastructure throughout its plan as a seemingly difficult challenge, but the ages of the various types of infrastructure are not offered beyond general statements. Staff also cautions the Company from replacing infrastructure based solely on age as it is more appropriate to evaluate the condition and health (i.e. inspections) of the assets along with age considerations.

Staff's comments to UPPCo's DSP, p. 4 (based on natural order following the cover page). The Staff thereafter specifically comments on the topics of forecasting and long-term planning, outage cause determination, affordability and cost-effectiveness, line clearance/vegetation management, projected reliability metrics, community and customer engagement, geographic information system (GIS)/asset management, and undergrounding and cable rejuvenation.

With regard to forecasting and long-term planning, the Staff indicates its agreement with UPPCo on pages 16 and 21 of the company's DSP that load forecasts on the distribution system are a key component of plan development. While the Staff finds the company's annual forecast of system peak demand coincident with American Transmission Company for each substation bus on UPPCo's distribution system to be useful, the Staff contends that the company "should also perform forecasts of the *noncoincident* peak demand at each substation bus, and provide these

alongside the coincident peak demand forecasts in its next DSP." Staff's comments to UPPCo's DSP, p. 5 (emphasis in original). The Staff, on this point, states that:

> [t]he purpose of the DSP is to evaluate the current state of the distribution system and identify the actions needed to make the system safe, reliable and resilient, and accessible in a cost-effective manner. There is no guarantee that the noncoincident peak demand for a given circuit will be equal to the demand for that circuit at the time of the system peak. Because of this, to evaluate whether a circuit is nearing its rated capacity limits, the noncoincident peak demand for that circuit is as or more important than the coincident peak.

Id. The Staff further appreciates the company's inclusion of Tables 5a and 5b of Appendix 1 showing historical and forecasted coincident peak demand for each substation bus on the company's distribution system. Consistent with above, however, the Staff recommends that the company produce these same tables in its next DSP but also with the inclusion of noncoincident peak demand. The Staff further recommends that:

> [a]long with the Megawatt (MW) and Megavolt-ampere reactive (MVAR) peak demands, the Company should include the capacity ratings for each circuit shown in Tables 5a and 5b. The peak demand for a circuit is much more informative when provided alongside the maximum volt-amperes and volt-amperes reactive that can be sustained by the circuit being studied. Circuits that are nearing their rated capacity limits should be given extra scrutiny.
>
> Staff reiterates that the Company should provide all of the information required in the Commission's 2025 guidelines, including the methodology and data used to forecast, circuit voltage, capacity (in MW or MVA), peak and minimum daytime load for each of the previous five years for each circuit, MWs of existing DERs and forecasted MW of DERs by DER type. The Company should also provide historical and forecasted electric vehicle load for each circuit, to the extent that the Company has the data granularity required.
>
> The next UPPCO DSP should also include forecasts that mirror what will be considered by the Company in its next Integrated Resource Plan (IRP), such as low building and transportation electrification impacts to its forecasts and a high building and transportation electrification impact discussion alongside its business-as-usual forecast. It is extremely important that the "bottom-up" circuit level forecasts that are the focus of the DSP align (in terms of inputs, assumptions, and methodologies considered) as much as possible with the "top-down" system level forecasts provided in PSCR plans, rate cases, and integrated resource plans. This extends to energy and peak demand forecasts.

Staff's comments to UPPCo's DSP, pp. 5-6.

On the topic of outage cause determination, the Staff acknowledges that the company's service territory is spread out, includes heavily forested and rugged cross-country terrain that is impacted by lake effect weather from Lake Superior, is subject to outages even when conditions do not meet the definition of a major weather event, and has complexities for line crews during restoration. While the Staff understands the need for safe and quick outage restorations, the Staff contends that this can thus lead to improper or inconsistent classification of reported outage codes, noting concern that "the cause descriptions 'Weather-Other' and 'Unknown' provided in Appendix 1, Table 4a are not granular enough and could be given a more precise definition that offers the true cause of outages that permit meaningful analysis and potential corrective actions." Staff's comments to UPPCo's DSP, p. 7. The Staff, in this regard:

> echoes what was pointed out by the Liberty Consulting Group (Liberty) – the notion that certain cause labels diminish the effectiveness of the analysis of outage causes necessary to identify and optimize solutions to address them. Staff recommends the Company reduce the use of general outage cause codes such as "Weather-Other" and "Unknown" and recategorize them to ensure the ability to analyze specific causes that allow the Company to determine meaningful measures to not only address them but also inform future planning strategies.

Id. (footnote omitted).

On affordability and cost-effectiveness, the Staff states that, despite UPPCo having the highest residential rates of any Michigan rate-regulated utility, the company only mentions affordability three times in general terms in its DSP, including in its mission statement; is not transparent on how it considers or applies affordability in investment decisions; provides no other insights into how it ensures affordability for its customers other than describing its low-income programs in its DSP; and does not provide details on how it evaluates benefits and costs or alternatives analyzed. The Staff references affordability and cost-effectiveness as an objective from the October 11 order,

alongside a focus on reducing ratepayers impacts and burdens with alternatives analyzed from the September 8 order. The Staff, on this basis, expresses concern "with the lack of focus and transparency the Company is dedicating to affordability" and indicates that it "would like to see more detail on how affordability is integrated into the DSP in future filings, detailing which projects are cost effective, alternatives that were considered, and how the Company will ensure affordable rates for the future." *Id*., p. 8.

As it relates to line clearance/vegetation management, the Staff highlights UPPCo's vegetation management program, 6-year cycle approach, and current complications with trees outside the right-of-way (ROW). Expressing concern with the latter, the Staff indicates that it:

> would like to see the Company analyze its current trimming practices and study if more aggressive trimming practices - such as ground to sky trimming, overhang removal in all zones, more frequent tree trimming cycles (4-5 year), and improvements in targeting outside of ROW trees - could improve the number of vegetation outages the Company is experiencing.
>
> Liberty reviewed the practices of Michigan's two largest Companies, Consumers Energy [Company] and DTE [Electric Company], and states in the DTE report that, "most utilities rely on a 4-year tree trimming cycle for distribution voltages". Staff encourages the Company to investigate if a shorter trimming cycle (4 or 5 years) is cost-effective in reducing the number of vegetation-caused outages. Staff also encourages the Company to improve its vegetation management practices as it relates to targeting more aggressive removal of outside of ROW trees.

Staff's comments to UPPCo's DSP, pp. 8-9 (footnote omitted).

On projected reliability metrics, the Staff discusses UPPCo's overview and data provided in the company's DSP but notes that the company did not project or forecast reliability metrics beyond historical values or provide future targets for its metrics, the latter which the Staff contends is a primary function of planning. In this context, the Staff states that:

> [i]n the September 8 Order, the Commission adopted recommendations from the Attorney General to present forecasted metrics in their final DSP such as UPPCO reports in [Commission] Docket No. U-21122. The order was directed to "utilities subject to this order and docket", including UPPCO through the order in [Commission] Docket[] No. U-21286 which states, the plan shall be "consistent with the September 8, 2022 order in Case No. U-20147". In addition, the 2025 guidelines approved by the Commission in its July 10th order includes forecasting of reliability metrics in future distribution plans to provide support and additional insight to the Company's planning.
>
> While UPPCO is not yet subject to the July 10, 2025 guidelines as this plan was filed prior to its approval, the Company falls under the approved September 8 Order to provide forecasted reliability metrics. Staff recommends the Commission require such forecasted metrics as described above before approving any recovery requested by the Company on future investments in which the Company uses forecasted reliability to justify an investment, if the Company does not provide these forecasted metrics as part of or before the next rate case filing. Currently, Staff has no data on projected reliability goals to verify if such investments are prudent or needed. The Company is encouraged to offer these details under the Supplemental Rate Case Filing (Section VI) of the 2025 guidelines in its next rate case or DSP filing (whichever comes first) to fill this gap.

Staff's comments to UPPCo's DSP, pp. 10-11 (footnote omitted).

For community and customer engagement, the Staff mentions accessibility as one of the four objectives listed in the October 11 order; the recommendation for future plans identifying problems, goals, and possible solutions through community and third-party engagement in the September 8 order; and the incorporation of a "Third Party and Community Outreach" section in the 2025 guidelines. On this, the Staff notes that UPPCo vaguely discusses this type of work and outreach in its non-wires alternatives section focused on energy efficiency but states that the company does not provide any discussion on problems, goals, and solutions identified or details on its engagement efforts. The Staff further states that:

> [p]rogram outreach does not adequately address the engagement the Commission and Staff is looking for. Staff is concerned the Company is not focused on working with the communities it serves and hopes to see an improvement in customer engagement as outlined in the September 8 Order and 2025 guidelines for future DSP filings. The Company must show how it considers and adopts the feedback from the communities it serves.

Staff's comments to UPPCo's DSP, p. 11.

With regard to the topic of GIS/asset management, the Staff commends UPPCo for its geographical transparency and dedication to asset management through valuable data tracked through GIS. The Staff, however, mentions the September 8 order asking utilities to provide details on asset health and condition in addition to age and thus encourages UPPCo "to integrate asset health, tracked through inspections, into [its] GIS asset management and would like to see a deeper discussion on asset conditions in future DSP filings." Staff's comments to UPPCo's DSP, p. 12. The Staff further reiterates that, "although age is an important consideration, asset conditions are also important to consider when making these investment decisions." *Id*.

Lastly, addressing undergrounding and cable rejuvenation, the Staff highlights the information provided by UPPCo; however, "[i]n addition to providing the overall future spend plan and strategy for undergrounding, Staff recommends the Company provide more detail surrounding the analyses performed by engineering, the outcomes of the analyses, and a summary of the alternatives analyzed in its next plan." Staff's comments to UPPCo's DSP, p. 12. Referring the company also to the Commission's undergrounding considerations in Case No. U-21388, the Staff states that:

> [c]able rejuvenation was a topic discussed on Day 1 of the workshop [as part of that docket]. Staff opines that cable rejuvenation, where appropriate and feasible, may yield substantial benefits in extending the life of existing underground cable. On page 50 of the plan, the Company discusses its undergrounding replacement plan and makes no mention of cable rejuvenation as an option in the plan. Staff is uncertain whether cable rejuvenation simply cannot be done, has not been explored, or is being done; therefore, Staff recommends the Company explore cable rejuvenation of existing underground assets, analyze whether this is a cost-effective option, and present its cable rejuvenation strategy in its next DSP.

Staff's comments to UPPCo's DSP, p. 13.

The Staff then concludes with a summary of its recommendations for UPPCo moving forward:

1. Staff recommends the Company apply the 2025 guidelines and any other subsequent guidance from the Commission in its future plan filings.

2. Staff recommend[s] the Company provide specific projected spend amounts under programs including, but not limited to, strategic undergrounding, asset renewals, and grid modernization to provide added transparency to the projected spend plans and investment strategy. These program spend projections must be traceable and align with spend categories/programs presented in rate cases.

3. Staff recommends the Company reduce the use of general outage cause codes such as "Weather-Other" and "Unknown" and re-categorize them to ensure the ability to analyze specific causes that allow the Company to determine meaningful measures to not only address them, but also inform future planning strategies.

4. Staff recommends the Company integrate affordability into future DSP filings detailing which projects are cost effective, alternatives considered, and how the Company is ensuring affordable rates for the future. Further, the Company shall place a stronger emphasis on affordability transparency by explaining how it considers affordability and cost-effectiveness for its customers beyond narrative in the next DSP filing.

5. Staff recommends the Company analyze the cost-effectiveness of its current trimming practices and conduct further analysis to determine if more aggressive trimming practices such as overhang removal, ground to sky clearing, shorter trimming cycles, and increased outside of ROW removals could improve the number of vegetation outages experienced by customers.

6. Staff recommends the Company provide its forecasted reliability goals prior to or within its next rate case filing. These should be offered in its next rate case or DSP filing (whichever comes first). Staff recommends the Commission consider these absent forecasted metrics when considering approval of any recovery requested by the Company on future investments in which the Company uses forecasted reliability to justify an investment.

7. Staff recommends the Company improve its customer engagement efforts and details in plans to identify problems, goals, and potential solutions for future DSPs as outlined in the September 8 Order and 2025 guidelines.

8. Staff recommends the Company integrate asset health, tracked through inspections, into [its] GIS asset management and provide a deeper discussion on asset conditions and age in future DSP filings. Further, Staff cautions the Company from replacing assets based solely on age. Although age is an important consideration, asset conditions are also important to consider when making investment decisions.

9. Staff recommends the Company provide more detail surrounding the undergrounding analyses performed by engineering, the outcomes of the analyses, and a summary of the alternatives analyzed in its next plan. Further, Staff recommends the Company consider cable rejuvenation of existing underground assets, analyze whether this is a cost-effective option, and present its cable rejuvenation strategy in its next plan.

Staff's comments to UPPCo's DSP, pp. 13-15.

As indicated above, no response was filed on the Staff's comments to UPPCo's DSP.

Discussion

The Commission has reviewed the DSPs filed by Alpena, NSP-W, and UPPCo, along with the comments and replies thereto, and thanks the utilities and the Staff for their time, efforts, and considerations in their filings. In particular, the Commission appreciates Alpena's data-driven approach to distribution planning and finds the company's transparency in its presentation and its prioritization of reliability metric improvement to be a model. While the Commission acknowledges that these were the first DSPs filed by Alpena, NSP-W, and UPPCo, and while the Commission agrees with the Staff that each DSP generally met the DSP requirements at the time they were filed, the Commission finds room for improvement and is confident that through this order, incorporation of the 2025 guidelines, and acceptance/agreement with the Staff's recommendations, that the next iterations of DSPs filed by the utilities will be more refined and targeted and will help to provide better insight into the utilities' strategies moving forward.

Against that backdrop, the Commission agrees with the Staff that the 2025 guidelines apply to the next iterations of DSPs to be filed by Alpena, NSP-W, and UPPCo. As ordered by the July 10 order, these three utilities are required to file their next DSPs in a new docket by the date indicated, "consistent with [the July 10] order and the new distribution system plan filing guidelines." July 10 order, p. 33. In that order, the Commission also stated that:

> utilities can seek waivers from specific provisions of these guidelines upon a showing of good cause, [specifically noting that] the Commission is particularly sensitive to the reality that some of the elements included in this order may result in disproportionate costs for smaller utilities operating in Michigan. As such, the Commission notes its willingness to consider waivers for specific requirements included in this order, particularly for smaller utilities. Any request for a waiver of requirements to be included in future DSPs shall include a discussion and justification outlining why the waiver is warranted, a description of which requirements the utility seeks to have waived, and a justification for how the waiver is in the best interests of its customers. Waiver requests shall be filed in the individual docket not less than four months before the respective utility's next DSP filing date.

Id., pp. 31-32.

The Commission next agrees with the Staff's recommendations regarding absent or limited customer and community engagement details in the DSPs filed by Alpena, NSP-W, and UPPCo. The Commission, in this regard, emphasizes the importance of meaningful, creative customer and community engagement aimed at identifying problems and potential solutions in future DSPs. *See*, July 10 order, Exhibit A, pp. 2, 4.

Next, the Commission agrees with the Staff's recommendations regarding absent forecasted reliability metrics in the filed DSPs and notes the requirement for such metrics in the 2025 guidelines. *See*, July 10 order, Exhibit A, p. 7.

The Commission also agrees with the Staff's recommendations concerning load forecasting and scenario planning. The Commission, on this point, encourages the utilities to focus on distribution system coincident and non-coincident peak demand for each month of the year and, whenever feasible, demand forecasts for each hour of the year; to discuss actions or planned solutions as a result of changes in forecasted load on the distribution system; and to evaluate various load forecasting scenarios that align with other planning efforts. *See*, July 10 order, Exhibit A, p. 7.

Lastly, the Commission agrees with the recommendations concerning additional details to support the utilities' AMI investments. Assuming the investment is made, the Commission finds it appropriate for Alpena and NSP-W, specifically, to provide: (1) a breakdown of the benefits the new proposed technology may offer with a comparison of the benefits the utility plans to leverage; (2) an assessment of interoperability of future investments with existing infrastructure that supports current AMI programs; (3) how the utility would plan to utilize additional features to improve reliability, safety, and accessibility in an affordable manner; (4) alternative options considered with an explanation of why the preferred option was selected; (5) discussion on how the utility is planning for potential cellular network obsolescence; and (6) projected cost savings in areas including meter reading, storm restoration, and remote connections/disconnections. As reference to this, the Commission directs the utilities' attention to the upcoming AMI Technical Conference, as discussed on page 99 of the March 21, 2025 order in Case No. U-21585. Relative to this topic, the Commission also agrees with the Staff that the approved settlement agreement in Case No. U-21565 makes no specific mention of AMI cost recovery for NSP-W outside of an AMI opt-out provision under Paragraph 6.F. The Commission, however, notes that the settlement agreement also does not bar or limit AMI cost recovery, and, as noted by NSP-W, "[a]s typical with the Company's settlement agreements in Michigan, recovery of each investment is not detailed in settlement, but the settlement agreement [contains] higher level indications of recovery amounts." NSP-W's response, p. 6. As this appears to be a possible contested issue, the Commission defers this issue to NSP-W's next electric rate case and suggests that the company, in accordance with its stated willingness, provide its AMI details in support of cost recovery again in that case. *Id*. This way, to the extent this difference of opinion affects party positions on AMI

cost recovery, a proper record can be developed from which the Commission can render a proper decision.

THEREFORE, IT IS ORDERED that:

A. Alpena Power Company, Northern States Power Company, and Upper Peninsula Power Company shall file their next distribution system plans in a new docket, consistent with this order and the July 10, 2025 order in this case.

B. The docket for Case No. U-20147 is closed, pending further guidance by the Commission.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, pursuant to MCL 462.26. To comply with the Michigan Rules of Court's requirement to notify the Commission of an appeal, appellants shall send required notices to both the Commission's Executive Secretary and to the Commission's Legal Counsel. Electronic notifications should be sent to the Executive Secretary at LARA-MPSC-Edockets@michigan.gov and to the Michigan Department of Attorney General - Public Service Division at sheac1@michigan.gov. In lieu of electronic submissions, paper copies of such notifications may be sent to the Executive Secretary and the Attorney General - Public Service Division at 7109 W. Saginaw Hwy., Lansing, MI 48917.

MICHIGAN PUBLIC SERVICE COMMISSION

Daniel C. Scripps, Chair

Katherine L. Peretick, Commissioner

Shaquila Myers, Commissioner

By its action of April 30, 2026.

Lisa Felice, Executive Secretary

P R O O F O F S E R V I C E

STATE OF MICHIGAN)

Case No. U-20147

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on April 30, 2026 A.D. she electronically notified the attached list of this **Commission Order via e-mail transmission**, to the persons as shown on the attached service list (Listserv Distribution List).

Brianna Brown

Subscribed and sworn to before me
this 30th day of April 2026.

Angela P. Sanderson
Notary Public, Shiawassee County, Michigan
As acting in Eaton County
My Commission Expires: May 21, 2030

Service List for Case: U-20147

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