

May 6, 2020

Michigan Public Service Commission

Case No. U-20757

Dear Chairman Talberg and Commissioners Scripps and Phillips:

Thank you for the steps you have taken so far to protect the health and safety of Michigan residents during the COVID-19 pandemic, including outlining the voluntary actions electric and gas utilities have taken to provide relief for customers in the March 26, 2020, press release from the Michigan Public Service Commission (MPSC).

In response to the MPSC's April 15, 2020, order in Case No. U-20757 inviting public comment on the MPSC's review of its response to the novel coronavirus (COVID-19) pandemic, including the statewide state of emergency, and its guidance and direction to energy and telecommunications providers and other stakeholders, we offer the following comments.

The utilities' voluntary actions in response to the COVID-19 pandemic are commendable, however they are proving insufficient to collectively meet Michiganders' needs during this emergency. The current utility emergency measures apply only to customers who are enrolled in low-income programs, those with income at or below 200% of the federal poverty level, and senior programs applicable to those 65 years or over for Consumers Energy customers and 62 years or over for DTE Energy customers. The quality and clarity of voluntary measures also ranges across utilities, resulting in inconsistent treatment among state residents and creating undue inequities and stress during a time of crisis, and additional steps are needed to protect Michiganders.

Residential access to water, gas, and electricity is essential for complying with Governor Whitmer's statewide executive orders designed to protect public health and curtail the spread of COVID-19. However, more time at home and the widespread loss of jobs and wages across Michigan has increased the energy burden of tens of thousands of residents, many of whom may no longer be able to afford utility payments and require assistance.

For these reasons we join many other community and environmental organizations, including the Michigan Environmental Council, Sierra Club, and Soulardarity, in requesting that the MPSC issue a directive that utilities cease residential customer shut-offs through the duration of the state of emergency. Additionally, we ask you take actions to ensure all residential customers are protected as follows:

- Establish a moratorium on utility shut-offs, late-payment fees, and an automatic reinstatement of service through the duration of the state of emergency and a period thereafter;
- Establish temporary percentage of income rates that utilities can charge customers who cannot afford the standard rate;
- Ensure that utilities are required to clearly communicate information about shut-off suspensions, reinstatements of service, and financial relief plans through multiple avenues and languages;

- Ensure that residential customers' rates will not be unfairly increased to recover utility revenue shortfalls; and
- Put an immediate halt on any negative reporting to credit agencies for non-payment of utility bills during the peacetime emergency.

Additionally, accrued bill charges suddenly coming due after the state of emergency subsidies would put great economic pressure on many lower-income Michigan families that may already be struggling to recover and pay their bills. The MPSC could consider implementing forgiveness of outstanding balance programs, with eligibility caps based on income. As a long-term solution, consideration and preference should be given to the expansion of energy efficiency and distributed solar programs to help ease the energy cost burden on the most vulnerable households.

Thank you for your consideration of these comments as you continue to address this public health crisis and work to ensure that all Michiganders have access to critical utility services and are protected from further undue burden during our collective economic recovery.

Sincerely,

Edyta Sitko, Midwest Senior Campaign Coordinator  
Union of Concerned Scientists

And the undersigned:

<b>Name</b>	<b>City</b>	<b>Name</b>	<b>City</b>
Richard Gilman	Kalamazoo	Pat Andring	Pinckney
Joe A Woller	Whitehall	Kyle Peterson	Sterling Heights
Michelle Ash	Lake City	Rosanne Arnowitz	Saline
Diane Johnson	Richmond	Linda Francisco	Oak Park
Mary Germain	Kalamazoo	Janet Peterson	Troy
William Zick	Ann Arbor	Barbara Wiltz	Wakefield
Jane Mayes	Port Austin	Steven Yankoviak	Kalamazoo
Rosalind Folman	Royal Oak	Kimberly Brandimarte	Warren
Ray Keeling	Milford	Pamela Alvesteffer	Fremont
Donald Garlit	Canton	Nm Porter	Ypsilanti
Kenneth Thompson	Saint Clair Shores	Kathy Oppenhuizen	West Olive
Jennetta Clark	Detroit	Janet Anderson	Oak Park
Sheila Wentzel	Washington	Mark Peltan	Clinton Township

<b>Name</b>	<b>City</b>	<b>Name</b>	<b>City</b>
Joyce Coe	Hastings	Kerry Lytle	Fennville
Kristin Tepsa	Houghton	Tracy Schalk	Grand Rapids
Jim Capizzo	Madison Heights	Jean Veenema-Birky	Glenn
Timothy Lauxmann	Leslie	Neville D'Souza	Troy
Shirley Burga	Gregory	Kelly Kroske	Grass Lake
Caroline Clark	Grand Rapids	Erica Rose	Garden City
Jeffery Anderson	Flint	Karen Hewelt	Algonac
Harriet Gelfond	Farmington Hills	Matthew Boruta	Dearborn
Aggie Monfette	Royal Oak	Michele Reynolds	Oak Park
Sherron Collins	Spring Lake	Peggy Malnati	Farmington Hills
Jim Ellis	Royal Oak	Charles Dineen	Lawton
Robert Daigle	Warren	Donald Priest	Petoskey
Jim Watkins	Grand Rapids	Kirk Bails	Harrison Twp
Brian Burt	Plainwell	Lore Weber	Vandalia
Joan Reyes	Livonia	Lindsey Walker	Petoskey
Matt Brzezinski	Saint Clair Shores	Jos Doty	Fountain
Tom Cannon	Haslett	Denise Brennan	Auburn Hills
Mary Dunn	Royal Oak	Matthew Nossal	Milan
Michael Livingston	Augusta	Richard Sies	Hillsdale
Marcia Haggins	Detroit	Judith Maxwell	Cadillac
Evelyn Whitfield	Detroit	Kathy Mason	Sebewaing
Carol Fletcher	Ann Arbor	Richard Sparkes	Grand Blanc
Paul Markillie	Grand Blanc	R Bach	Farmington
Richard Prochowski	Yale	Deborah Tardy	Kentwood
Tracy Crawford	Mt Pleasant	Michael Zeller	Grosse Pointe Farms
Winnie Gallagher	Novi	Richard Jackson	Sand Lake
Bonnie Spanier	Traverse City	William Yaroach	Kalamazoo
Jeanne Heugh	Chesterfield	Andrea Zajac	Williamston

<b>Name</b>	<b>City</b>	<b>Name</b>	<b>City</b>
Jacqueline Potoski	Southgate	Armgard Everett	Holland
Donna Delisi	Lenox	Kenneth Large	Royal Oak
Faye Lapp	Flint	Pamela Nordhof	Hamilton
Steven Sy	East Lansing	Richard Han	Ann Arbor
Rebecca Freund	Houghton	Keith D'Alessandro	Canton
Margaret Jordan	Detroit	Jeffery Morgenthaler	Lowell
Hali McEachern	Dearborn	Randall Fisher	Grand Haven
Charlie Weaver	Kalkaska	Phill Patzer	Cadillac
Greg Farnum	Pontiac	Terry Huff	Laurium
Cynthia Edwards	Ann Arbor	Allen Korth	Gladstone
Nancy Weatherwax	Albion	Gary LaClair	Beverly Hills
Tracy Burroughs	Royal Oak	Kristin Green	Sault Sainte Marie
Marianne Szalega	Redford	Michael & Libby Robold	Kingsley
Theresa Cervantes	Cheboygan	David McCollum	Kalamazoo
David Hast	Grand Rapids	Michael Salgat	Plymouth
Debra Rumberger	West Olive	Anne Jackson	Ann Arbor
Marian Volkman	Ann Arbor	Barbara Toshalis	Kalamazoo
Rick Gardner	Warren	Georgiann Young	Saint Joseph
Julie Ozias	Waterford	Gordon Jones	East Grand Rapids
Daniel Stiglitz	Escanaba	Janet Scarrow	Kalamazoo
Jan Sockness	Ann Arbor	Laura Lyons	Custer
Linda Luke	Belleville	Steven Shroder	Lakeside
Leo Dorr	Lapeer	Ginger Lee Pierce	Holt
Lorraine Thompson	Saline	Christine Wendt	Saline
Gayle Strung	Richland	Kathrina Spyridakis	Waterford
Alan N. Connor	Ann Arbor	Nancy Uschold	Marquette
Sandra Linabury	Mattawan	Carol Stody	Williamsburg
Jennifer Moody	Kalamazoo	Gavin Bornholtz	Grand Blanc

<b>Name</b>	<b>City</b>	<b>Name</b>	<b>City</b>
Mary Ann Baier	Dearborn	Clara Bakker	Holland
Ashley Yonker	Kalamazoo	Linda Fausey	Lansing
Donna Russell	Roscommon	Anne Pavlic	Northville
Richard Grzeskowiak	Dexter	Carlotta Ripley	Niles
Patricia Howie	Flint	Ginger Beeler	Port Huron
Sarah Ragalyi	Lathrup Village	William Phillips	Ann Arbor
Mary Powell	Flint	Ilene Kazak	Brighton
Lisa Whipple	Hartland	Barry Carlson	Midland
Ron Katz	Huntington Woods	Jessica Hayes	Dearborn Heights
Marjorie Wing	Lansing	Diane Good	Bellaire
Sasha Jackson	Detroit	Garrick Updyke	Cheboygan
Catherine Palmer	Allen Park	Janice McDaniel	Westland
John Poore	Lansing	Dorothy Wolf	Alto
Larry Rolfe	Sunfield	Lenny Segel	Farmington Hills
Scott Golding	Ann Arbor	Joy Rosenberry Chase	Madison
Robert Jenkin	Walled Lake	Richard Smith	Melvindale
Thomas Rewoldt	Ann Arbor	Christine Tindall	Detroit
Kristina Lozon	Grand Blanc	Jeff Kronick	Lake Orion
Keith Hamilton	Ludington	Ruth Ann Carter	Farmington Hills
Lee Engstrom	Grand Rapids	Maureen Sheahan	Southfield
Mary Peterson	Saint Joseph	Maria Miller	Grand Rapids
Margaret Schmid	Ann Arbor	Robert Welker	Ypsilanti
Mike Wolk	Bloomfield Hills	Bill Smit	Roscommon
Linda Mulder	Northville	Sue Nearing	Vassar
Art Hanson	Lansing	Yvonne Brown	Armada
Noa Iacob	Ann Arbor	Patricia Cooney	West Bloomfield
Angela Cole	Erie	Nancy Kanistanoux	Okemos
Kenneth Wright	Roscommon	Richard Peterson	Haslett

<b>Name</b>	<b>City</b>	<b>Name</b>	<b>City</b>
Rama K Paruchuri	Ann Arbor	Alicia Knoblock	Highland
Jessica Orlando	Ludington	Laura Symons	Highland
David Bauer	Portage	Richard Wallace	Ann Arbor
Jim Becklund	Dewitt	Linda Prostko	Caledonia
Lesley Miller	Applegate	Melissa Hoving	Portland
Marsha Gottesman	Midland	David Halperin	Ann Arbor
Roxane Dow	Oak Park	Laura Paalanen	Wayland
Heath Post	Lansing	Hannah Walters	Grand Rapids
Linda Blodgett	Lansing	Jackie Schmitz	Middleville
Jo Ingman	Fenton	Carol Scherpenisse	Spring Lake
Norma Bailey	Mt Pleasant	Marie Roy	Dearborn
Kathleen McMahon	Ypsilanti	Ron Kardos	Fenton
Jazmine Harvey	Kincheloe	Briana Purcell	Dearborn Heights
Susan Whitlock	Ann Arbor	Jackie Kerr	Flint
Dolores Arndt	Dafter	Bf Bayha	Westland
Eleanor Castle	Kalamazoo	Jerry Mawhorter	Royal Oak
Michele St Peter	Flat Rock	Mike Birkett	Farmington Hills
Sarah Sercombe	Royal Oak	Marc Taras	Ann Arbor
Robert Vandervennet	Tipton	Scott Flood	Niles
Frank Vaydik	Saginaw	Roberta Chisholm	Wyandotte
Dottie Delehanty	Pontiac	Roberta Marine	Lansing
Georgie Peterson	Farmington Hills	Robert Ferguson	Ann Arbor
Daniel Magennis	Grand Rapids	Alfred Wooden	Sterling Heights
Sarah Adrian	Lathrup Village	John Kurczewski	Indian River
Karen Dukovich	Frankenmuth	Linda Babcock-Caswell	Caledonia
Lynne Brimecombe	Ann Arbor	Marianne Fix	Trenton
Sarah Kelsey	Kalamazoo	Charles Hendriks	Troy
Michael Ray	Southgate	Ann Krantz	Traverse City

<b>Name</b>	<b>City</b>	<b>Name</b>	<b>City</b>
Lisa Graham	Madison Heights	P Fs	Ann Arbor
Julie Heiner	Grand Haven	Baysan Tulu	Holland
Cynthia Hill	Davisburg	Rayaan Moussa	Dearborn
John LaFrance	Warren	Charnita Moore	Eastpointe
Nick Lovro	Saranac	Linda Darnall	Burton
Carol Zitnik	Southfield	Katherine Holmes	Ann Arbor
Enrico Aquino	Ann Arbor	Alexander Danke	Livonia
Gwendolyn Hetler	Skandia	Julie Preis	Ann Arbor
Lon Herman	Ferndale	Nancy Boyd	Big Rapids
A. McGarry	Taylor	Brian Dalton	Dearborn Heights
Carol Vaseleski	Kalamazoo	Kimberly Carignan	Kewadin
Olga Scronin	Brownstown Twp	Karen Seefelt	Royal Oak
Nelson S.	Ypsilanti	Sonja Ptaszek	Ferndale
Suzanne Ellis	Caledonia	Jennifer Winnell	Petoskey
Tor Goodwin	Jackson	Linda Dres	South Lyon
Carol Raitzer	Boyne City	Peggy Van Sickle	Brighton
David Williams	Highland Park	John Walters	Shelby Township
Ellen Dreyer	Farmington	Jacqueline Y Frisbie	Belding
Maegen Gabriel	Stockbridge	Lynore Manning	Oscoda
Margaret Rink	Chelsea	Sara Astorga	Albion
Mary Jane Schuon	Lansing	Roberta Byrd	Osseo
Alvin Anderson	Detroit	Hugh Gurney	Howell
Laurie Piersma	Holland	Elissa Miller	Manistee
Robert Dunn	Manchester	John Messer	Brutus
Mary Brigid Clingman	Grand Rapids	Nina Siagkris	Kalamazoo
C Petrick	Beulah	Brian Bodemann	Lowell
A. Leo Reilly	Detroit	Emily Randles	Detroit
Ilia Iverson	Royal Oak	Robert McNamee	Port Hope

<b>Name</b>	<b>City</b>	<b>Name</b>	<b>City</b>
Lauren Jacobs	Traverse City	Toni Hamilton	Detroit
Nora Wesley	Oxford	Pat McNeeley	Detroit
Anna Bayles	Ferndale	Gloria Kidd	Redford
Nancy Herck	Lanse	Marguerite Rouleau	Rochester
Jennifer Cobble	Rochester	Harvinderjit Saran	Farmington Hills
Erin Froehlich	Ada	Steve Keim	Columbiaville
Ruth Lezotte	Suttons Bay	Carole Pappas	Grand Blanc
Barbara Hansen	Grand Rapids	Dave Themm	Imlay City
Cam Streidl	Grand Rapids	Leslie Sutliff	Ashley
Laura Kofsky	Grand Rapids	Chris Swanson	Lawton
Bernice Houseward	Grand Rapids	James Hug	Adrian
Emily Haggerty	East Lansing	Pamela Macchia	Byron Center
Joyce Hare	Portage	Dwight Sanders	Rochester
Pamela Hawkins	Lansing	Marc Archer	Lake Odessa
Lori Bukoski	Ann Arbor	Liz Cote	Saint Clair Shores
Margaret Gearhart	Monroe	Cody Low	Grosse Pointe Park
Vanessa Brissette	Auburn	Jennifer Anderegg	Ypsilanti
Lynell Morr	Waterford	Roman Aleksander	Canton
Kirsten Johnston	Big Rapids	Albert Calderon	Muskegon
Jen Bezanson	Madison Heights	Betty Maltz	Oak Park
Mark Warren	Madison Heights	Mary O'Neill	Presque Isle
Jeanine Center	Ann Arbor	Carla C	Ann Arbor
Holly Graves	Dearborn	Ruth Woodcock	Ypsilanti
Linda Mussio	Manchester	George Furman	Waterford
Denise Boldea	Plymouth	Lester Belanger	Brant
Donald Bemister	Temperance	Jamie Clark	Harrisville
Wayne Ricket	Kingsley	Kathleen James	Southfield
Betty Adams	Onkama	Paul Marcussen	Benzonia

<b>Name</b>	<b>City</b>
Lucinda Hansen	Battle Creek
Marthea Jager	Grand Rapids
Jim Hopper	Norton Shores
Margaret McClellan	Ypsilanti
Stardust Universe	Fennville
Mary Ruth Parsons	Jackson
K D	Byron Center
Jay Zarowitz	Norton Shores
Valerie Mates	Ann Arbor
Nancy Cole	Warren
Mary Gladstone-Highland	Dearborn
Linda Wilke	Grand Rapids
Daisy Herndon	Madison Heights
Dale A Dapprich	Howell
Roberta Dempsey	Dearborn
Barbara Hyman	East Lansing
Pete Udfgias	Holland
Kathryn Sensat	Bronson
Rosemary Catanese	Grosse Pointe
Rosemary Steers	Grand Rapids