

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter, on the Commission’s own motion, to)
commence a collaborative to consider issues related)
to implementation of effective electric demand)
response tariffs and efficient deployment of)
load-modifying resources.) Case No. U-20628

In the matter, on the Commission’s own motion,)
to address outstanding issues regarding demand) Case No. U-20348
response aggregation for alternative electric)
supplier load.)

At the October 29, 2020 meeting of the Michigan Public Service Commission in Lansing,
Michigan.

PRESENT: Hon. Daniel C. Scripps, Chair
Hon. Sally A. Talberg, Commissioner
Hon. Tremaine L. Phillips, Commissioner

ORDER

History of Proceedings¹

On September 11, 2019, the Commission issued an order opening the docket in Case No. U-20628 (September 11 order) to establish a collaborative group to review and discuss information contained in the 2019 Statewide Energy Assessment report (2019 SEA report)

¹ Since the primary driver of this order relates to Case No. U-20628, this section details the history of proceedings for Case No. U-20628. For a history of proceedings for Case No. U-20348, *see*, the August 8, 2019 order in Case No. U-20348 (August 8 order), chiefly pages 1-6 and 23.

regarding the reasons for the poor response of load-modifying resources (LMRs)² during Michigan's January 29 through February 1, 2019 cold weather emergency and to discuss ways to improve future LMR participation and performance when deployment is required.³ In the September 11 order, the Commission provided a framework for the collaborative group and directed the Commission Staff (Staff) to file a report with initial recommendations in the docket no later than July 31, 2020.

On October 17, 2019, the Commission launched MI Power Grid in Case No. U-20645,⁴ which, among other things, connected Case No. U-20628 with the MI Power Grid initiative and led to the formation of the MI Power Grid Demand Response (DR) Stakeholder Workgroup (workgroup).

The workgroup, steered by the Staff and comprised of a diverse group of representatives, met on January 16, February 19, March 17, and April 28, 2020, and on July 1, 2020, the Staff released a draft report (draft report) of its DR findings and recommendations, inviting review and comment from the workgroup.⁵ Formal comments on the draft report were thereafter submitted by the Association of Businesses Advocating Tariff Equity; the American Council for an Energy-

² For purposes of Case No. U-20628, LMR refers to customers who agree to reduce their consumption during times of extreme demand or abnormal system performance.

³ See, 2019 SEA report, Case No. U-20464, filing #U-20464-0063, 9.3.1.1 Compiled Recommendations and Observations for Mitigating Risks, Electric Recommendation E-1, p. 195.

⁴ See also, <www.michigan.gov/mipowergrid> (accessed October 28, 2020).

⁵ See, <https://www.michigan.gov/mpsc/0,9535,7-395-93307_93312_93593_95590_95594_95685-508662--,00.html> (accessed October 28, 2020). The Staff also developed a solutions document that helped shape its report. See, <https://www.michigan.gov/documents/mpsc/2-19_Panel_Solutions_682089_7.pdf> (accessed October 28, 2020).

Efficient Economy; DTE Electric Company (DTE Electric); Indiana Michigan Power Company; Voltus, Inc.; and Consumers Energy Company (Consumers).⁶ On July 31, 2020, the Staff filed its MI Power Grid Demand Response Final Report (final report).⁷

The Commission Staff's MI Power Grid Demand Response Final Report

In the Executive Summary of its final report, the Staff states that inaccurate resource availability and a breakdown in communication processes were responsible for most of the underperformance that occurred during the cold weather emergency last year. While recent tariff changes by the Midcontinent Independent System Operator, Inc. (MISO) and procedural changes by utilities⁸ have been put into place since that time to address those problems, the Staff states that the workgroup highlighted several ways to improve upon these changes and ensure that DR is able to perform at an exceptional level. More specifically, according to the Staff:

The report calls for several enhancements to the utility-customer relationship, including more frequent communication, improved customer readiness procedures, and the incorporation of new technologies to streamline interactions with the customer before, during, and after an event. The report also recommends that utilities develop three key building blocks within their DR programs: real-time metering, customer readiness and a robust software platform to manage customer interactions. To the extent that these assets have not already been developed by the utility, the report recommends exploring cost-effective utility-DR service provider partnerships to take advantage of services already pre-built by these external entities.

While a strong utility-customer relationship certainly reinforces one aspect of DR performance, procedures and processes must also be in place to ensure the resource is able to perform when called upon. The report recommends that notification

⁶ See, Case No. U-20628, filing #U-20628-0003 and the appendices to filing #U-20628-0004. The Advanced Energy Management Alliance also submitted comments, albeit informal comments, to the Staff.

⁷ See, Case No. U-20628, filing #U-20628-0004.

⁸ The term “utilities” in the Staff’s final report, and for purposes of this order as it relates to Case No. U-20628, means Michigan rate-regulated utilities that administer DR programs.

procedures and penalty provision be clearly articulated in each utility's respective tariffs and also highlights several areas where standardization of these processes may provide clarity to the customer and utility alike. To ensure the physical ability of a DR resource to perform during an event, utilities should also conduct an annual real power test or a documented simulation, taking the customer's testing burden into account when deciding between testing and simulation.

Final report, Executive Summary, pp. i-ii. The Staff further suggests that utilities continue to explore multiple program options as Michigan's DR portfolio continues to grow and becomes more sophisticated, mentions the existing pilot process as a means for such exploration, and concludes with a remark about any tariff changes as a result of recommendations, if accepted by the Commission, being effectuated in a general rate case or an *ex parte* proceeding.

Following further introduction, details about the workgroup itself, and an extensive overview of DR stakeholder engagement activities, including a summary of cold weather emergency experiences, lessons learned, and progress shared by representatives from the workgroup,⁹ the Staff sets forth and explains nine recommendations discussed below,¹⁰ as tasked by the Commission, based on significant input from the stakeholders, and building on the DR improvements/changes made since last year.

Discussion

The Commission thanks those involved in this matter, including the Staff for its significant role and work in developing its final report. DR is a valuable resource, particularly with increased power plant retirements and the need to efficiently meet customer demand during peak periods. Accordingly, DR must evolve with changes in markets, technology, and communications and continuously improve to reflect learnings, such as the experience with DR performance during

⁹ See, Staff's final report, pp. 1-23.

¹⁰ An outline of these recommendations was also included in the Executive Summary, page ii.

MISO's cold weather emergency last year. Through steps already taken since that time by utilities, RTOs, and DR customers, and with further improvements as discussed below, the Commission is optimistic for DR in Michigan to be on the right path toward achieving its full potential to benefit all ratepayers and support a clean energy future.

1. Ensure load modifying resource availability is properly accounted for in Midcontinent Independent System Operator, Inc.'s communication system tool

In its final report, the Staff states that the primary contributor to the underperformance last year was a failure to enter the proper availability into MISO's communication system (MCS) tool, referencing several instances of utilities marking DR customers who were not required to respond outside of summer as available in the MCS. The Staff asserts that resource availability should be accurately represented to avoid this issue in the future and advocates for full compliance with MISO tariff revisions and changes to utility procedures since last year. The Staff states, "With ongoing MISO rules, including LMR accreditation, LSEs [load serving entities] should also ensure that the information in the MECT [Module E Capacity Tracking] [tool] is updated as changes are made." Staff's final report, p. 24. The Staff further mentions plans by MISO to undertake a stakeholder process to evaluate potential changes to MCS reporting requirements for DR resources, given stakeholder concerns about reliance on DR availability data in the MCS as it relates to capacity accreditation of such resources.

The Commission agrees with this recommendation. As mentioned above, the Commission acknowledges the work that has been done to improve operations of DR. However, also acknowledging and sharing stakeholder concerns, the Commission directs the Staff to continue monitoring actions taken by MISO to ensure that LMR availability is accurately captured by MISO for use in real-time operations so that expected DR resources are there to be called and relied upon.

2. Ensure clarity and consistency in communication processes

The Staff states a lesser contributor to the underperformance last year was communication by the utilities being too delayed/imprecise and confusion among customers. According to the Staff, the utilities should recognize and know how DR notifications from the regional transmission organizations (RTOs) are sent; such notifications should be timely processed by the utilities and relayed to customers as soon as possible, ideally within five minutes; and emergency notifications to reduce load should sound and look different than economic notifications. The Staff states that this communication from the utilities to their customers could occur across a variety of platforms and suggests multiple contacts for each customer site, reviewed at least annually, to reduce the number of unreachable contacts.

The Commission agrees with this recommendation. Clear and consistent communication is key to the success of DR, given its dependence on permission or response from customers in reducing load. The Commission therefore directs DTE Electric and Consumers to include an update on their communication protocols with customers for both economic and emergency DR events in their annual DR reports to be submitted to the Commission by February 1, 2021, and annually thereafter, consistent with Exhibit B attached to the November 7, 2016 order in Case Nos. U-17936 *et al.* While reporting on this recommendation extends to only DTE Electric and Consumers at this time, the Commission expects other utilities to also incorporate this recommendation into their DR processes.

3. Increase demand response provider interaction with the customer¹¹

The Staff notes that, although rarely called upon in the past, emergency DR is expected to perform in full when dispatched. While most utilities communicate with customers at least once per year to review customer obligations, offer assistance, and develop as-needed load reduction plans, the Staff contends that more frequent interaction, on a case-by-case basis, may be preferable as the state's DR portfolio expands and as DR is called upon more throughout the MISO and PJM Interconnection, L.L.C. (PJM) (or RTO) regions. As set forth by the Staff, "Biannual or quarterly contact, particularly for non-direct load control customers, would help strengthen the DR provider-customer relationship, offer an opportunity to alleviate any concerns, and set expectations ahead of each season." Staff's final report, p. 25.

The Commission agrees with the importance of this recommendation to ensure that DR will show up in real-time. Thus, to monitor this interaction on a case-by-case basis, the Commission directs DTE Electric and Consumers to develop and submit to the Commission by 5:00 p.m. (Eastern time (ET)) on November 30, 2020, in Case No. U-20628, an updated 45-day DR report template that identifies which entity called the DR event (utility or RTO) and whether the call was based on reliability or economics, along with any other updates deemed necessary to make determinations about whether DR is showing up in real-time to support reliability. Persons interested in commenting on this template may do so in Case No. U-20628 by 5:00 p.m. (ET) on December 14, 2020.

¹¹ For purposes of the final report, "DR provider" means any company providing a DR program, including both utilities and third-party providers." Staff's final report, p. 6.

4. Explore the use of enabling technologies where feasible and cost-effective

The Staff asserts that enabling technology “can help the customer’s response obligation, provide visibility into DR deployment, and enable more sophisticated management of a provider’s DR portfolio.” *Id.* With advanced metering infrastructure available throughout most of the state providing hourly data, along with real-time meters for some commercial and industrial customers, the Staff believes Michigan to be well-situated to make use of other technologies, should they be proven cost-effective, and recommends that, with direction from the Commission, DR providers make full use of existing infrastructure and the case for new technology as it develops. The Staff states:

Technologies such as automatic controls, automatic notification systems, and software platforms are key to some of the recommendations in this report and would continue to provide value as DR grows throughout the state. In particular, the utilization of a software platform can assist with multiple aspects of DR registration, deployment, and reporting, stacking the value delivered by such a tool. With increased visibility into DR dispatch and real-time issues, such technologies could further enable DR value stacking by making it easier for the DR provider to manage customers enrolled in multiple programs, potentially increasing the value each MW [megawatt] could provide. In addition, any technologies adopted for DR purposes would likely prove useful in the future as DERs [distributed energy resources], including storage, expand in Michigan.

Id.

The Commission acknowledges the Staff’s recommendation and directs the Staff to work with utilities on this recommendation in the utilities’ DR plans set forth in future filings, whether that be in a future rate case, integrated resource plan filing, or DR reconciliation case. The Commission envisions such discussion taking place through standard case processes and in recommendations proposed by parties to such proceedings, with those discussions focused on making the full use of existing DR infrastructure, along with, if applicable and appropriate, a thorough demonstrated case for new technology as it develops.

5. Direct utilities to explore demand response partnerships for real-time metering, customer readiness, and a centralized platform

Referencing direction from the Commission in Case No. U-20348, the Staff asserts that, to the extent utilities do not already possess the capabilities discussed directly above, partnering with a third-party DR provider may be more economically efficient for ratepayers than developing such assets in-house, may add valuable improvements to reliability and the utility-customer interface, could be leveraged by the utility to better manage its DR portfolio, and allow for better interaction with DR customers. Ideally, according to the Staff, “a robust, user-friendly platform would help with customer registrations and load reduction planning, streamline communications, enable real-time coaching, and quickly provide after-the-fact performance reports directly to the customer.” *Id.*, pp. 25-26.

The Commission agrees with this recommendation and, in line with the August 8 order, finds that DTE Electric and Consumers should also report on their efforts of exploration and potential use of partnerships with DR providers in their annual DR reports to be submitted to the Commission. Additionally, in light of recent federal changes at the Federal Energy Regulatory Commission (FERC),¹² along with renewed discussion and updates from the Staff and stakeholders about the topic of DR aggregation in Case No. U-20628, the Commission finds it appropriate to reopen Case No. U-20348 for the purpose of accepting comments and reviewing the Commission’s current ban on Michigan retail electric customers (either individually or through

¹² On September 17, 2020, FERC issued Final Rule, Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators, Docket No. RM18-9-000, 172 FERC ¶ 61,247 (Order 2222). Order 2222 removes barriers for DERs, including DR, to participate alongside traditional resources in wholesale markets through aggregations but explicitly respects relevant electric retail regulatory authorities’ current ability to prohibit retail customers’ DR from being bid into wholesale markets by aggregators. *See*, Order 2222, p. 48.

aggregators) of Commission-jurisdictional electric utilities from bidding DR resources into RTO wholesale markets. Specifically, and at this time, the Commission is interested in responses to the following questions:

1. Should the partial ban on DR aggregation maintained in the August 8 order be lifted to allow full participation of aggregated DR resources in the wholesale markets?
2. Should the Commission delay its final decision on lifting the partial ban on DR aggregation until the Commission receives greater clarity from the RTOs and FERC, including around implementation of Order 2222? If the Commission determines the ban should be lifted, should the effective date coincide with the implementation of Order 2222?
3. Are the safeguards put in place for aggregation of DR for customers participating in the retail open access market sufficient or are additional measures needed if the current ban is lifted?
4. Are current Commission processes and procedures, including capacity demonstrations, sufficient to ensure visibility into DR aggregator activity and related accounting for maintaining operational reliability and supporting utility resource planning and procurement? If not, what changes are needed?
 - a. How should double counting of DR be avoided, particularly for customers currently enrolled in utility DR programs?
 - b. To what extent should Commission processes and procedures interact and/or overlap with RTO processes to ensure proper registration, information sharing, and transparency? Are RTO processes alone sufficient to provide visibility into DR aggregator activity?
 - c. If it is found that more information or oversight is needed for operations, planning, or customer protection and disclosure, are there statutory limitations that would stymie the Commission's ability to obtain sufficient information on DR aggregation?

Any interested person may submit written or electronic comments on this topic and in response but not limited to the questions directly above. All comments on this topic should reference Case No. U-20348 and must be filed with the Commission no later than 5:00 p.m. (ET) on November 30, 2020, with reply comments to be filed no later than 5:00 p.m. (ET) on December 14, 2020.

6. Require an annual documented simulation and encourage real power testing where feasible

While real power testing may be the preference, the Staff recognizes the impact of such testing on certain customers' operations and thus suggests rigorous simulations, documented for the benefit of the customer, utility, and RTO, as a reasonable substitute for these types of customers. The Staff avers that, in this circumstance, the "[s]imulations should reproduce emergency conditions, enable the customer to walk through each step of the emergency procedures, and provide an opportunity for after the fact learnings. If approached in this manner, simulations balance the reliability need of the system with the economic impact of a real power test." Staff's final report, p. 26. However, according to the Staff, to the extent practicable and if cost-effective, DR providers should be encouraged to perform a real power test. The Staff states that this real power testing could include testing only part of the customer's accredited load reduction, which may provide valuable insight into reliability while minimizing the impact, and for added flexibility, the customer's tariff could offer the opportunity to request a real power test, for example if the customer expects operations to already be interrupted for other reasons. The Staff concludes that "[u]tilities should be directed to list testing requirements in their retail tariffs, which would enhance accountability for ratepayers, who will be assured that the resource they pay for is available, and for the utility, who is ultimately responsible for the load reduction at MISO." *Id.*

The Commission agrees with this recommendation and finds that the utilities should, as necessary, update their retail tariffs to include testing requirements, outlining whether tests will be real power tests or simulations, with updates to the tariffs submitted to the Commission for approval no later than April 1, 2021, in either the utilities' next general rate case or through a standalone proceeding, whichever is most efficient and appropriate under MCL 460.6a.

7. Formalize and standardize the notification procedure and penalties in utility tariffs

The Staff asserts that a formalized notification procedure “will provide greater clarity for the customer and would set expectations before an event occurs” and, in referencing its second recommendation above, states that these procedures should include specific expectations for the type of event, whether emergency or economic, with preference given to the customer on its preferred communication method but not precluding the utility from being able to utilize multiple communication methods during an event. *Id.* The Staff further recommends consistency across utilities for customer response times (i.e., how long the customer has until it must reduce load after a call from the utility), specifically referencing interruptible customers served by different utilities at different locations, along with consistency across utilities and their rates when it comes to penalties, since non-interruption costs do not vary for different service territories and because the call for emergency interruption ultimately comes from MISO.

The Commission agrees with this recommendation and finds that the utilities should also update their retail tariffs to reflect this recommendation in their filing to be submitted to the Commission for approval no later than April 1, 2021, as set forth directly above.

8. Any necessary tariff changes should be made in a general rate case or an *ex parte* case

The Staff states that significant tariff changes that affect the cost to serve customers should occur in general rate cases, but in instances where the changes are minor and do not change the cost for any other customer, the Staff recommends that those types of changes, like several recommendations in its final report, occur in a quicker, *ex parte* case.

As stated above, the Commission finds that any necessary tariff changes should be submitted to the Commission for approval no later than April 1, 2021, in either a general rate case or a

standalone proceeding, acknowledging that a standalone proceeding could be *ex parte* if appropriate under MCL 460.6a.

9. Enable demand response value stacking: capacity + energy + ancillary services

The Staff asserts that the ability of DR to provide multiple services will be increasingly valuable and should be encouraged wherever possible, as the need for grid flexibility grows throughout the industry. The Staff mentions the existence of dual-registration options already at MISO and PJM, which the Staff avers should be matched by diverse program offerings at the retail level, and recommends that “testing of dual-registration options, particularly the economic or ancillary component of DR, occur through the pilot program process.” *Id.*, p. 27. The Staff further mentions ways for utilities to engage their customer bases, if interest in dual-registration seems lacking, and suggests that through this process “that the DR provider could test various [RTO or MISO and PJM] M&V [measurement and verification] options, to match the utilities’ needs while giving customers flexibility as to how their performance will be measured.” *Id.*

The Commission is supportive of this recommendation, given the holistic opportunity value stacking can provide for customers, utilities, the grid, and the transition and acceleration to a clean energy future. The Commission further finds this recommendation from the Staff to be in line with the essence of Order 2222.

THEREFORE, IT IS ORDERED that:

A. The Commission Staff shall monitor actions taken by Midcontinent Independent System Operator, Inc., in accordance with this order.

B. DTE Electric Company and Consumers Energy Company shall submit updated annual demand response reports to the Commission by February 1, 2021, and annually thereafter, in accordance with this order.

C. DTE Electric Company and Consumers Energy Company shall develop and submit, to the Commission by 5:00 p.m. (Eastern time) on November 30, 2020, in Case No. U-20628, an updated 45-day demand response report template, in accordance with this order. Persons interested in commenting on this template may do so in Case No. U-20628 by 5:00 p.m. (Eastern time) on December 14, 2020.

D. The Commission Staff shall work with Michigan rate-regulated utilities on enabling technologies for demand response in future utility demand response filings, in accordance with this order.

E. The docket in Case No. U-20348 is reopened for the purpose of accepting comments and reviewing the current ban on Michigan retail electric customers (either individually or through aggregators) of Commission-jurisdictional electric utilities from bidding demand response resources into regional transmission organization wholesale markets. Any interested person may submit written or electronic comments on this topic, as set forth in the order, with comments to be filed with the Commission in Case No. U-20348 no later than 5:00 p.m. (Eastern time) on November 30, 2020, and with reply comments to be filed no later than 5:00 p.m. (Eastern time) on December 14, 2020.

F. Written comments, as set forth in this order, should be sent to: Executive Secretary, Michigan Public Service Commission, P.O. Box 30221, Lansing, MI 48909. Electronic comments (preferred) may be e-mailed to mpscedockets@michigan.gov. All comments should reference the appropriate case in accordance with this order. If you require assistance prior to filing, contact the Commission Staff at (517) 284-8090 or by e-mail at mpscedockets@michigan.gov. All information submitted to the Commission in the matter will become public information available on the Commission's website and subject to disclosure.

G. All Michigan rate-regulated utilities shall submit to the Commission for approval, no later than April 1, 2021, any necessary changes to their retail tariffs in accordance with this order in either their next general rate case or a standalone proceeding, whichever is most efficient and appropriate under MCL 460.6a.

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, under 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 mpscedockets@michigan.gov and to the Michigan Department of the Attorney General – Public Service Division at pungpl@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

Sally A. Talberg, Commissioner

Tremaine L. Phillips, Commissioner

By its action of October 29, 2020.

Lisa Felice, Executive Secretary

PROOF OF SERVICE

STATE OF MICHIGAN)

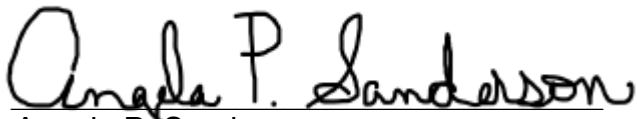
Case No. U-20628 *et al.*

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on October 29, 2020 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 29th day of October 2020.



Angela P. Sanderson
Notary Public, Shiawassee County, Michigan
As acting in Eaton County
My Commission Expires: May 21, 2024

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Phil Forner