

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 new)	
technologies and business models.)	Case No. U-20898
_____)	

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

In the October 17, 2019 order in Case No. U-20645, the Commission established the MI Power Grid initiative, in partnership with Governor Gretchen Whitmer (October 17 order). MI Power Grid is a focused, multi-year stakeholder initiative to maximize the benefits of the transition to clean, distributed energy resources (DERs) for Michigan residents and businesses. MI Power Grid seeks to engage utility customers and other stakeholders to help integrate new clean energy technologies and optimize grid investments for reliable, affordable electricity service, and includes outreach and education as well as changes to utility regulation designed to advance Michigan’s clean energy future.

In the October 17 order, addressing the issue of integrating emerging technologies, the Commission indicated that “[e]nsuring timely and fair grid access and appropriate information

exchange to support customer-oriented solutions and reliable system operations” is a focus of the initiative, and that one of the corresponding work areas would be:

New technologies and business models, including preparing for the opportunities and challenges associated with the commercialization of new technologies and business models such as electric vehicles, electric storage, and other technologies still under development, both at customer and utility scale.

October 17 order, p. 7 (emphasis in original). The purpose of this order is to officially launch the New Technologies and Business Models stakeholder workgroup as part of Phase II of MI Power Grid, and provide guidance to the Commission Staff (Staff) and stakeholders on the Commission’s objectives and expectations for this effort.

Background and Recent Developments

Since the issuance of the October 17 order, several developments have occurred related to this topic. These provide important context as discussed below.

- **Electric Vehicles and Mobility** – Three electric utilities, DTE Electric Company, Consumers Energy Company (Consumers), and Indiana Michigan Power Company, have been implementing new or expanded electric vehicle (EV) programs to include rebates and time-of-use rates,¹ in coordination with other state and regional efforts such as the state’s mapping of a fast charging network, transportation electrification projects funded by the Volkswagen settlement, the recently announced Michigan Connected Corridor (an autonomous vehicle mobility corridor between Detroit and Ann Arbor), and a Midwest multi-utility EV charging network.² In addition, on February 25, 2020, Governor Whitmer

¹ See, March 29, 2018 order in Case No. U-18368; January 9, 2019 orders in Case No. U-20134 (two orders); May 2, 2019 order in Case No. U-20162; and November 8, 2018 order in Case No. U-20282.

² See, <https://www.mlive.com/news/kalamazoo/2020/09/electric-vehicles-will-get-a-boost-for-interstate-travel-with-midwest-fast-charger-network.html> (accessed October 26, 2020).

issued Executive Directive (ED) 2020-1 directing the creation of the Michigan Office of Future Mobility and Electrification, and designating a Chief Mobility Officer to head it. In addition, she signed Executive Order (EO) 2020-2 to create the Michigan Council on Future Mobility and Electrification. The Commission chair, or designee, serves on the Council.

- **Federal Developments on Energy Storage and Distributed Energy Resources** – The Federal Energy Regulatory Commission (FERC) has continued to review regional transmission operators’ (RTOs’) implementation of Order 841,³ which addresses energy storage in wholesale electricity markets and has recently been affirmed by the U.S. Court of Appeals for the D.C. Circuit. *See, Nat’l Ass’n of Regulatory Utility Comm’rs v Fed Energy Regulatory Comm*, 964 F3d 1177 (CA DC, 2020). This includes approval of Order 841 compliance filings by the Midcontinent Independent System Operator, Inc. (MISO) and PJM Interconnection, L.L.C. (PJM).⁴ Moreover, on September 17, 2020, FERC issued Order 2222, building off of Order 841 and addressing the aggregation and participation of all DERs in wholesale markets.⁵ There is also federal legislation pending that would provide incentives and reduce barriers for energy storage.⁶

³ *Electric Storage Participation in Markets Operated by Regional Transmission Organizations and Independent System Operators*, 162 FERC ¶ 61,127 (February 28, 2018) (Order 841).

⁴ *See, e.g., Midcontinent Independent System Operator, Inc.*, 172 FERC ¶ 61,120 (August 3, 2020); *PJM Interconnection, L.L.C.*, 172 FERC ¶ 61,029 (July 16, 2020).

⁵ *Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators*, 172 FERC ¶ 61,247 (September 17, 2020) (Order 2222).

⁶ *See*, S.2657 (the American Energy Innovation Act); H.R.4447 (the Expanding Access to Sustainable Energy Act of 2019); and S.2332 (Grid Modernization Act of 2019).

- **State Energy Storage Roadmap** – The Department of Environment, Great Lakes, and Energy (EGLE) has commissioned the development of an energy storage roadmap for the state that will identify opportunities, policy barriers, and recommendations for energy storage in Michigan. This project is planned to conclude by September 30, 2021.
- **Governor Whitmer’s Economy-Wide Net Zero Carbon Target** – On September 23, 2020, Governor Whitmer issued ED 2020-10 and EO 2020-182, which announced the “MI Healthy Climate” Plan. ED 2020-10 builds on the commitments and actions taken in ED 2019-12, pursuant to which Michigan joined the U.S. Climate Alliance, a bipartisan coalition of governors from 25 states devoted to pursuing the goals of the internationally accepted Paris Agreement.
- **Utility Roles in Behind-the-Meter Generation and Renewable Energy Credit and Carbon Offset Sales** – The Commission has recently issued orders addressing a regulated utility owning behind-the-meter (BTM) solar generation⁷ or selling non-energy commodity environmental attribute products such as renewable energy credits (RECs). *See*, September 24, 2020 order in Case No. U-20649; and August 20, 2020 order in Case No. U-20839.

⁷ In the September 24, 2020 order in Case No. U-20649, pp. 50-56, the Commission declined to approve the Bring Your Own Bright Field program as part of Consumers’ voluntary green pricing (VGP) portfolio and provided direction for the Staff, the utility, and stakeholders to discuss (as part of the MI Power Grid initiative) issues related to the utility’s role in owning and operating BTM solar. The Bring Your Own Bright Field program, as proposed by Consumers, would have involved the utility facilitating customers’ application of BTM solar and potentially battery storage, with the utility owning the equipment as a rate-based asset. *Id.* The Commission has not determined whether or not this is a suitable role for the regulated utility (under VGP or otherwise), what guidelines are necessary should the utility or affiliate be engaged in this activity, or whether this activity is appropriate as a value-added service pursuant to MCL 460.10ee.

- **Staff Survey** - To help define the scope and timing of the New Technologies and Business Models effort, the Staff issued an informal survey to stakeholders on August 21, 2020.

Results of the survey included the following:

- A majority of stakeholders (93%) supported the Commission launching the workgroup in October 2020.
- Most stakeholders (74%) supported the workgroup meeting series commencing before year-end 2020, with 20% supporting a January 2021 start.
- The top five technology areas stakeholders were most interested in exploring were: energy storage, demand response (DR), community solar, EVs, and energy efficiency advancements.
- Stakeholders suggested varied regulatory barriers and business models be explored in the workgroup ranging from accounting treatment and incentive alignment, to increased flexibility and support for business model innovations.
- Stakeholders recommended the problem statement be defined to help guide topics.

Scope of the New Technologies and Business Models Workgroup

The Commission realizes the potential scope of this workgroup could be expansive, and could cross over into other MI Power Grid efforts and Commission proceedings such as energy planning, utility incentives and disincentives/performance-based ratemaking, DR, energy waste reduction (EWR), competitive procurement, data access, rate design, generation interconnection, and customer engagement. The response to the Staff's survey illustrates not only the breadth of potential topics of interest among stakeholders but also the fact that no single topic is clearly prioritized over others. Therefore, to best prioritize the time and efforts of the Staff and stakeholders, the Commission seeks to clarify through this order its intentions for the initial scope of the workgroup. Additional guidance can be provided by the Commission through the course of this effort as needed.

At the outset, the Commission agrees with the survey suggestion to include a problem statement in this order to guide this effort, and finds the following statement best captures the Commission's intention:

- There are regulatory and business model barriers to the deployment and full utilization of clean, distributed energy resources in Michigan. Stated differently, there is the need to adapt the regulatory framework to allow for different applications of DER and to define the appropriate roles of utilities and other entities in supporting a more decentralized energy system that is clean, affordable, reliable, and accessible.

With this problem statement guiding the approach, the New Technologies and Business Models workgroup will be designed to create a shared understanding of different technologies and their potential applications, and to identify barriers and potential solutions for consideration by the Commission. The examination of barriers should focus on issues and solutions that the Commission, in its oversight of utilities under the current regulated market model established by the Michigan Legislature, can address. Nonetheless, the Commission recognizes that market, policy, or legal impediments to certain technology applications may be identified through this process that extend beyond the Commission's ability to address directly under its existing authority. To illustrate this point, there may be non-existent, conflicting, or confusing regulatory provisions pertaining to microgrids in utility rates and tariffs, interconnection procedures, planning models, procurement methods, and investment evaluation methods. These issues could be identified and presented for Commission guidance or action through this docket, or another Commission forum. There may also be legal ambiguity and public policy questions involving the participation by multiple end-use customers in a microgrid project that is owned by a third-party or by end-use customers. Although certain technology applications or solutions may face legal

constraints under the Commission’s existing authority, the Commission finds that it would be appropriate to catalog these issues as part of this process. The workgroup is not expected to resolve issues that would require action by the Legislature or to define what could or could not be addressed within the Commission’s existing authority.

This microgrid example also highlights the interplay between this workgroup and other MI Power Grid workgroups or Commission proceedings. Clearly, microgrids, energy storage, and EVs face barriers related to utility incentives/disincentives, as survey respondents acknowledged, as well as interconnection, procurement, and planning barriers. What is unique about the New Technologies and Business Models workgroup is the educational focus, to learn about the potential benefits, impacts, and barriers associated with emerging technologies and to address issues, at least initially, through a technology-specific lens. The Commission will be evaluating utility incentives/disincentives in more depth and breadth through another MI Power Grid workgroup and other initiatives. *See*, October 17 order; May 8, 2020 order in Case No. U-20561; and August 20, 2020 order in Case No. U-20147.

Likewise, the Commission is attempting to address energy planning, interconnection, rate design, and procurement barriers through other workgroups.⁸ The Commission envisions that examining barriers faced by specific technologies and their various applications should complement and inform these other efforts. The Staff leads will coordinate on a regular basis to share information, avoid duplication, and, where appropriate, hold joint sessions among

⁸ MI Power Grid activities are spread across several dockets, including: (1) Distribution Planning in Case No. U-20147; (2) Interconnection Standards and Worker Safety in Case No. U-20344; (3) DR in Case No. U-20628; (4) Grid Security and Reliability Standards in Case Nos. U-20629 and U-20630; (5) Energy Programs and Technology Pilots in Case No. U-20645; (6) Advanced Planning – Integration of Resource/Distribution/Transmission Planning in Case No. U-20633; and (7) Competitive Procurement in Case No. U-20852.

workgroups. The Commission and the Staff will also coordinate with other agencies, including EGLE, on the energy storage roadmap, carbon mitigation planning, and energy project permitting/siting, as well as with the Department of Labor and Economic Opportunity on mobility and EVs.

The Commission directs the Staff to focus initially on several specific technologies, and then consider broader issues surrounding the vision and role of the utility in the operations of a more distributed energy future. Regarding the scope of technologies, given MI Power Grid's emphasis on "clean, distributed energy resources," the Commission clarifies that the technologies and business model discussions should be centered around clean, distributed energy resources as opposed to other emerging technologies, at least at this time. This would not foreclose consideration of topics such as renewable hydrogen, renewable natural gas, or carbon sequestration at some point either through this workgroup or another forum based on additional direction from the Commission. The Commission takes a broad view of DER to include both customer and utility-scale projects.⁹

Given the anticipated regulatory implications and opportunities, and the survey feedback, the Commission directs the workgroup to start with a focus on the following technologies and topics, with the sequencing to be determined and topics potentially expanded by the Staff with input from stakeholders (thus, these topics are listed in no order of priority, nor should this be viewed as an exhaustive list of topics or issues to address):

⁹ The Commission acknowledges the various definitions of DERs, some of which encompass EVs and demand-side resources, and others of which do not. For example, the Commission adopted a definition of DERs in its recent distribution planning order, which excludes demand-side resources for clarity. August 20, 2020 order in Case No. U-20147, pp. 11, 41. This is different from the more expansive definition in Order 2222, as well as the Commission's reference to DERs in the context of the overall MI Power Grid initiative.

- Microgrids
- Electric vehicles¹⁰
- Energy storage
- Distributed energy generation¹¹
- Space and water heating using heat pumps

The Commission recognizes that survey respondents suggested DR and EWR as additional topics. While demand-side resources are critical to achieving the goals of MI Power Grid in a cost-effective manner and raise many technology and business model questions, the Commission is not including them within the scope of this workgroup at this time given the various ongoing formal proceedings and workgroups addressing demand-side solutions.

¹⁰ As mentioned above, the Commission has already approved EV pilot programs for three major investor owned utilities based on a make-ready model for the utility, with utility rebates for Level 2 and DC fast-charging installations with time-of-use rates and other technology or programmatic pairings such as DR and battery storage. As these programs are being implemented and other efforts are underway in coordination with other state agencies, the Commission expects that this workgroup could monitor experiences to date and provide feedback on potential gaps, barriers, or areas for improvement for these utility programs. Detailed discussions related to rate design and offerings for EVs and other DERs may be covered in the to-be-formed MI Power Grid “innovative rate offerings” workgroup, or conducted as a joint session with the New Technologies and Business Models workgroup when focusing on EVs. Finally, while the Commission has generally addressed the “sale for resale” issue in specific cases, there may be outstanding regulatory or legal barriers or ambiguities with respect to roles in equipment ownership and maintenance, such as a third-party owned charging installations being paired with onsite generation and/or a battery owned by that or another non-utility third-party. *See, e.g.*, May 2, 2019 order in Case No. U-20162, pp. 103-106; February 28, 2017 order in Case No. U-17990, pp. 159-160; and October 25, 2017 order in Case No. U-18368.

¹¹ The consideration of distributed energy generation should consider multiple technologies, including but not limited to solar and combined-heat-and-power (CHP), as well as multiple configurations and ownership structures. For solar, this could include both BTM and community solar projects, and for CHP this could include BTM and utility-scale applications sited at a customer’s location.

For the specific technologies referenced above, the Commission envisions addressing issues such as:

1. What are the drivers and trends for adoption of these technologies and the potential impacts under various scenarios?¹²
2. What are the roles of utilities, third parties, regional transmission organizations, and customers under different technology configurations or applications? What should these roles be under different utility business models?
3. What information exchange, controls, or monitoring systems are needed to enable a safe, reliable, and cost-effective integration of technologies? Are these systems under development and, if not, what are the major gaps?
4. Are there regulatory barriers that minimize or prevent implementation of these technologies or configurations of technology applications?
 - a. If so, what are these barriers and how may they be addressed?
 - b. If not, are there non-regulatory barriers these technologies face that prevent implementation?
5. How are these technologies currently treated in Commission rates and tariffs? Are there gaps, clarifications, or other changes that should be further considered?¹³
6. Are the benefits from these technologies fully considered in current regulatory processes?
 - a. What benefits of the technology are currently included in utility planning and regulatory processes?

¹² The Integrated/Advanced Planning workgroup is charged with formulating forecasting assumptions for EVs and other DERs for the next round of long-term energy planning by regulated utilities. *See*, August 20, 2020 order in Case No. U-20633, p. 3. There may be the opportunity to leverage this forecasting information for this workgroup, but the focus here is to provide high-level context on the potential pace and impact of change from increased technology adoption based on available forecasts. This outlook may inform the Commission's prioritization of issues and barriers to be addressed.

¹³ The objective is not to formulate new rate designs through this effort. The Commission expects to conduct a rate design study addressing DERs in response to Senate Resolution 142. *See*, MI Power Grid Status Report, October 15, 2020, Case No. U-20645, filing #U-20645-0004. Moreover, findings from the New Technologies and Business Models workgroup can feed into the future MI Power Grid efforts focused on rate offerings.

- b. Are there other benefits that are unaccounted for (e.g., resilience)? If so, what are they and how have others accounted for them in regulatory proceedings? Should they be included when analyzing benefits in regulatory proceedings and if so, how?

The Commission envisions that workgroup sessions would be organized to examine, as applicable, different configurations or ownership models, technical capabilities (e.g., resilience, voltage support, ramping), potential benefits or impacts, cost and adoption trends, and an inventory of barriers and potential solutions in the near and long term. In terms of examining potential benefits or impacts, the Commission is interested in considering a broad array of benefits in the context of Michigan's electric power system such as reliability, safety, affordability, accessibility, resilience, energy (energy, capacity, ancillary services), environmental impacts, equity, and community.

The Commission is not calling for cost-benefit analysis or quantification of benefits of technologies but rather to generally understand the impact and role of such technologies as Michigan's electric grid undergoes transformation and what needs to be done to realize benefits. In terms of barriers, the Commission is most concerned with regulatory and business model barriers that can be addressed by the Commission either directly or in coordination with the Governor and/or Legislature, as discussed above.

Following the technology-specific topics, the Commission also expects a focused session on models for modern grid operations with increased DERs, including consideration of the evolving role of the utility, the potential for the utility to serve as a distribution system operator, potential utility ownership of BTM or other customer-sited resources, regulatory models being pursued in other jurisdictions, and lessons learned from the workgroup's investigation of specific technologies, configurations, and ownership structures.

Timing and Next Steps

Based on the survey responses, the Commission is establishing this workgroup, with the kick-off meeting to be held in January 2021. During the remainder of 2020, the Staff will conduct research and planning for productive workgroup sessions. This may include additional informal stakeholder surveys to refine and prioritize topics and identify experts and complementary efforts to learn from. A proposed work plan will be posted to the website as part of the January kick-off meeting, and the kick-off meeting should also feature consideration of various models to accommodate the growth of DERs, including a holistic review of the various regulatory, market, and operational considerations involved in integrating increased levels of DERs. Deliverables will include the Staff preparing short summaries by technology covering community interest, forecasts, existing regulatory treatment, gaps, and barriers as well as identified solutions. In addition, no later than September 1, 2021, the Staff shall file in this docket a report summarizing efforts to date, providing recommendations for the Commission's consideration, and identifying potential next steps.

THEREFORE, IT IS ORDERED that:

A. The New Technologies and Business Models workgroup is established, as described in this order.

B. No later than September 1, 2021, the Commission Staff shall file in this docket a status report summarizing efforts of the workgroup to date, providing recommendations for the Commission's consideration, and identifying potential next steps.

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

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)

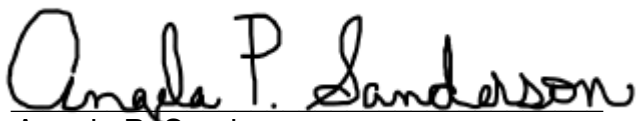
Case No. U-20898

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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