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 integrated resource and distribution plans.	Case No. U-20633
In the matter, on the Commission's own motion, to implement the provisions of Section 6t of 2016 PA 341.	Case No. U-18461
In the matter, on the Commission's own motion, to review the response of **ALPENA POWER COMPANY, CONSUMERS ENERGY COMPANY, DTE ELECTRIC COMPANY, INDIANA MICHIGAN POWER COMPANY, NORTHERN STATES POWER COMPANY, UPPER MICHIGAN ENERGY RESOURCES CORPORATION, AND UPPER PENINSULA POWER COMPANY** to recent storm damage in their service territories.	Case No. U-21122

At the September 24, 2021 meeting of the Michigan Public Service Commission in Lansing, Michigan.

PRESENT: Hon. Daniel C. Scripps, Chair
Hon. Tremaine L. Phillips, Commissioner
Hon. Katherine L. Peretick, Commissioner

ORDER

I. BACKGROUND

Public Act 341 of 2016

On December 21, 2016, Public Act 341 of 2016 (Act 341), an amendment to Public Act 3 of 1939 and Public Act 286 of 2008, was signed into law and became effective on April 20, 2017. Each electric utility was directed to file an integrated resource plan (IRP) within two years from the effective date of Act 341. MCL 460.6t(3). Section 6t of Act 341, MCL 460.6t, requires that every five years the Commission commence a proceeding to "[e]stablish the modeling scenarios and assumptions each electric utility should include in addition to its own scenarios and assumptions in developing its integrated resource plan." MCL 460.6t(1)(f). Section 6t(3) states that the Commission "shall issue an order establishing filing requirements, including application forms and instructions, and filing deadlines for an integrated resource plan." MCL 460.6t(3). For electric utilities with fewer than 1,000,000 customers in the state of Michigan, the Commission "may issue an order implementing separate filing requirements, review criteria, and approval standards" from those established for electric utilities whose rates are regulated by the Commission under Section 6t(3) of Act 341. MCL 460.6t(4). A multi-state electric utility, which is defined as an electric utility providing electric tariff service to customers in both Michigan and in at least one other state, "may design its integrated resource plan to cover all its customers on that multistate basis." *Id*. For a multi-state utility, the Commission will accept an IRP filed with the relevant regulatory commission in another state but "may require supplemental information if necessary as part of its evaluation and determination of whether to approve the plan." *Id*.

Sections 6t(1)(c) and (d) of Act 341 require that the Commission consult with the Michigan Department of Environmental Quality (now the Michigan Department of Environment, Great Lakes, and Energy (EGLE)) to identify "significant state or federal environmental regulations, laws, or rules" and "any formally proposed state and federal environmental regulation, law, or rule

that has been published in the Michigan Register or the Federal Register" and how each regulation, law, or rule would affect electric utilities in the state of Michigan. MCL 460.6t(1)(c-d). Section 6t(1)(f) requires that the Commission consult with EGLE to establish modeling scenarios and assumptions each electric utility should include in developing its IRP including "[a]ll applicable state and federal environmental regulations, laws, and rules identified in this subsection." MCL 460.6t(1)(f)(ii). Section 6t(7) states that:

> [t]he Commission shall request an advisory opinion from the department of environmental quality regarding whether any potential decrease in emissions of sulfur dioxide, oxides of nitrogen, mercury, and particulate matter would reasonably be expected to result if the integrated resource plan proposed by the electric utility under subsection (3) was approved and whether the integrated resource plan can reasonably be expected to achieve compliance with the regulations, laws, or rules identified in subsection (1).

Act 341 also requires that an IRP include "[a]n analysis of potential new or upgraded electric transmission options for the electric utility" and "[p]lans for meeting current and future capacity needs with the cost estimates for all proposed construction and major investments, including any transmission or distribution infrastructure that would be required to support the proposed construction or investment, and power purchase agreements." MCL 460.6t(5)(h) and (j).

On May 11, 2017 in Case No. U-15896, the Commission approved filing requirements and application instructions requiring that an IRP filing consider transmission interconnection costs and include any transmission interconnection studies or required transmission modifications to interconnect the facility.

To approve an IRP under Act 341, the Commission must determine that the proposed IRP represents the most reasonable and prudent means of meeting the electric utility's energy and capacity needs. MCL 460.6t(8)(a). To determine whether an IRP is the most reasonable and prudent means of meeting energy and capacity needs, the Commission considers a number of

factors, including whether the plan appropriately balances: (i) resource adequacy and capacity to serve anticipated peak electric load, applicable planning reserve margin, and local clearing requirement; (ii) compliance with applicable state and federal environmental laws; (iii) competitive pricing; (iv) reliability; (v) commodity price risks; and (vi) diversity of generation supply. MCL 460.6t(8)(a)(i-vi).

On November 21, 2017, in Case No. U-18418 (November 21 order), the Commission approved the Michigan Integrated Resource Planning Parameters (MIRPP)[1] pursuant to MCL 460.6t(1) and (2) and stated that "[e]ach electric utility whose rates are regulated by the Commission shall demonstrate compliance with the Michigan Integrated Resource Planning Parameters as a condition of Commission approval of its respective integrated resource plan pursuant to MCL 460.6t(3)." November 21 order, p. 88. On December 20, 2017, in Case Nos. U-15896 *et al*., the Commission approved application instructions for IRP filings and IRP filing requirements.[2] Section VI of the IRP filing requirements covers IRP scenarios and sensitivities, Section X covers energy forecasts, Section XI outlines capacity and reliability requirements, Section XII is dedicated to transmission analysis, and Section XVIII describes the environmental analyses.

[1] The Michigan Integrated Resource Planning Parameters are available as Case No. U-18418, filing # U-18418-0065, Exhibit A and are available here: https://www.michigan.gov/documents/mpsc/11-21-2017_MIRPP_Final_606706_7.pdf.

[2] The Integrated Resource Plan Filing Requirements are available in Case No. U-18461, filing # U-18461-0015. The order is available here: https://mi-psc.force.com/sfc/servlet.shepherd/version/download/068t0000001X2Co.

Statewide Energy Assessment

On September 11, 2019, in Case No. U-20464, the Commission approved the Michigan Statewide Energy Assessment (SEA) Final Report.[3] The SEA was conducted by the Commission in response to a request from Governor Gretchen Whitmer following electric and natural gas emergencies experienced during a polar vortex event on January 30 and 31, 2019. Chapter 8 of the SEA discusses gaps in existing planning processes and identifies areas for improvement, such as increased diversity in supply resources, improved generation diversity, and revisions to currently approved utility IRP modeling parameters and filing requirements. The SEA includes a series of recommendations intended to encourage generation diversity. Recommendation E-5 proposes that:

> utilities better align electric distribution plans with integrated resource plans to develop a cohesive, holistic plan and optimize investments considering cost, reliability, resiliency, and risk. As part of this effort, Staff, utilities, and other stakeholders should identify refinements to IRP modeling parameters related to forecasts of distributed energy resources (e.g., electric vehicles, on-site solar) reliability needs with increased adoption of intermittent resources, and the value of fuel security and diversity of resources in IRPs. A framework should also be developed to evaluate non-wires alternatives such as targeted energy waste reduction and demand response in IRPs and distribution plans.

SEA final report, p. 196. Recommendation E-6 proposes that the Commission Staff (Staff), utilities, and other stakeholders "propose a methodology to quantify the value of generation diversity in integrated resource plans." *Id*. Recommendation E-8.1 proposes that the Staff work with Michigan utilities and stakeholders to propose revisions to the Commission-approved IRP modeling parameters and filing requirements, including revisions that would better accommodate the consideration of transmission alternatives in IRPs. *Id*., pp. 196-197.

[3] The SEA Final Report appears in this case as filing # U-20464-0063 and is available here: https://mi-psc.force.com/sfc/servlet.shepherd/version/download/068t0000005XrEbAAK.

MI Power Grid

On October 17, 2019, in Case No. U-20645 (October 17 order), the Commission commenced the MI Power Grid initiative, 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 investment for reliable, affordable electricity service. As part of the MI Power Grid initiative, the Commission made the following commitment to the core area of optimizing grid investment and performance:

> Advanced planning processes for electric investments (resources, transmission, and distribution) will be examined to ensure modeling tools, assumptions, and processes are adapting to technology change, and to better integrate discrete planning activities currently being conducted for new resources (e.g., generation, demand-side options), transmission, and distribution, as detailed in the 2019 Statewide Energy Assessment. Work will also be done to quantify the value of resilience, particularly as it relates to distributed energy resources, as well as the value of diversity in the electric resource mix, in order to ensure proper consideration of both when evaluating proposed investments.

October 17 order, p. 8 (emphasis omitted).

Building on the above initiatives, the Commission opened the present docket. On August 20, 2020, in Case No. U-20633 (August 20 order), the Commission directed the Staff to begin outreach by holding a series of stakeholder sessions and to research best practices in several areas, including "[i]dentifying potential revisions to the Commission-approved IRP modeling parameters or the filing requirements to better accommodate transmission alternatives in IRPs in preparation for the next formal review of the Michigan IRP Planning Parameters expected to take place in 2022." August 20 order, pp. 3-4. Accordingly, the Commission initiated a collaborative to review and discuss improvements and ways to better align integrated resource planning and distribution planning, directed the Staff to coordinate with EGLE on the inclusion of public health and

environmental justice consideration in future IRPs, and directed the Staff to file a May 27, 2021 report (May 27 report) outlining its findings and recommendations.

MI Healthy Climate Plan

On September 23, 2020, Governor Whitmer issued the "MI Healthy Climate Plan" through Executive Directive (ED) 2020-10 and Executive Order (EO) 2020-182. ED 2020-10 builds on the commitments and actions taken in ED 2019-12 pursuant to which Michigan joined the United States (U.S.) Climate Alliance, a bipartisan coalition of governors from 25 states devoted to pursuing the goals of the internationally accepted Paris Agreement. In ED 2020-10, Governor Whitmer stated that, "[b]y joining the U.S. Climate Alliance, Michigan committed to pursue at least a 26-28% reduction below 2005 levels in greenhouse gas emissions by 2025 and to accelerate new and existing policies to reduce carbon pollution and promote clean energy deployment at the state and federal level." ED 2020-10, p. 1. Under the MI Healthy Climate Plan, "Michigan will aim to achieve economy-wide carbon neutrality no later than 2050, and to maintain net negative greenhouse gas emissions thereafter." *Id*.

To this end, Governor Whitmer directed EGLE to:

> expand its environmental advisory opinion filed by [EGLE] in the Michigan Public Service Commission's Integrated Resource Plan process under MCL sections 460.6t and also file environmental advisory opinions in IRPs filed under MCL 460.6s. [EGLE] must evaluate the potential impacts of proposed energy generation resources and alternatives to those resources, and also evaluate whether the IRPs filed by the utilities are consistent with the emission reduction goals included in this Directive. For advisory opinions relating to IRPs under both MCL 460.6s and MCL 460.6t, [EGLE] must include considerations of environmental justice and health impacts under the Michigan Environmental Protection Act. The Commission's analysis of that evidence must be conducted in accordance with the standards of the IRP statute and the filing requirements and planning parameters established thereto.

Id., pp. 2-3 (parentheticals omitted).

In EO 2020-182, Governor Whitmer created the Council on Climate Solutions (Council). She stated that the members of the Council will consist of the directors of six departments of the State of Michigan, the chairperson of the Commission, the Treasurer of the State of Michigan, the chief executive officer of the Michigan Economic Development Corporation, and 14 residents of the state of Michigan appointed by the governor. Governor Whitmer asserted that the Council must "[a]dvise [EGLE] in formulating and overseeing the implementation of the MI Healthy Climate Plan, which will serve as the action plan for this state to reduce greenhouse gas emissions and transition toward economywide carbon neutrality." EO 2020-182, p. 3.

Considering the directives set forth in ED 2020-10 and EO 2020-182, the Commission found that updating utility IRP planning parameters and filing requirements should take into account the goals set by Michigan's utilities and how those goals align with the greenhouse gas emissions targets set by Governor Whitmer.

Thus, on October 29, 2020, in this docket, the Commission directed the Staff to file a report in Case No. U-20633 (December 15 report) with a straw proposal for advancing these objectives, other proposals from states with similar greenhouse gas emission objectives or proposals identified in the stakeholder process, and any stakeholder feedback. The Commission ordered that the December 15 report also provide the Staff's recommendation and allow interested parties to file timely comments to be incorporated into the Staff's May 27 report.

II. THE COMMISSION STAFF'S DECEMBER 15, 2020 REPORT AND STRAW PROPOSAL

At the October 21, 2020 stakeholder meeting, the Staff presented a straw proposal for updating the utility integrated resource planning process to meet the objectives of ED 2020-10. The Staff developed two sets of proposals, one set of proposals for utilities filing an IRP before the MIRPP and IRP filing requirements are updated at the end of 2022 (near-term filings) and one set

of proposals for utilities filing after the Commission approves updated filing requirements (long-term filings). The proposals were provided to stakeholders for consideration, with each option varying one of the following parameters: "updates to the MIRPP (for [l]ong-term filings), need for an optimized run if the preferred plan does not meet compliance, a chart that tracks annual carbon emissions of the Company's preferred plan, and reporting requirements for other greenhouse gas emissions." December 15 report, p. 9.

After the Staff presented its straw proposal, it solicited feedback from the Integration of Resource, Transmission, and Distribution Planning workgroup and provided the opportunity for interested parties to present alternate proposals to meet the carbon emission reduction goals of ED 2020-10. The Staff noted in its December 15 report that Indiana Michigan Power Company (I&M) and the Ecology Center, the Natural Resources Defense Council, the Michigan Environmental Council, the Environmental Law and Policy Center, the Union of Concerned Scientists, Sierra Club, and Vote Solar (together, the Environmental Coalition) presented alternative proposals.

The Staff also conducted research on other states that have adopted similar emissions reduction goals to locate best practices in incorporating these goals into utility resource planning processes. December 15 report, p. 10. The Staff researched planning processes in California, Hawaii, Maine, Massachusetts, New York, and Washington. The Staff stated that "many states have a set goal for achieving carbon neutrality, however there are differences in when the state plans to achieve it, and in any interim metrics that must be met in the years before achieving carbon neutrality." *Id*. The Staff noted that there are significant differences in the details of the various states' goals, state and local regulations, legislative mandates, established utility resource planning parameters, market structures, and other metrics, and therefore it is difficult to apply

solutions and practices from other jurisdictions directly to Michigan. *Id*., p. 11. However, the Staff found that "[o]ne commonality between multiple plans, including Michigan, is the use of a Climate Council to develop a multi-phased implementation plan to achieve these goals (ME, NY, WA)." *Id*.

At the November 6, 2020, stakeholder session of the Integration of Resource, Transmission, and Distribution Planning workgroup, the Staff invited interested persons to submit comments on the Staff's straw proposal and the alternative proposals from I&M and the Environmental Coalition.

On November 25, 2020, the Association of Businesses Advocating Tariff Equity (ABATE), the American Council for an Energy Efficient Economy (ACEEE), Michigan Energy Innovation Business Council (Michigan EIBC), Armada Power, DTE Electric Company (DTE Electric), the Environmental Coalition, and Consumers Energy Company (Consumers) provided comments. In the December 15 report, the Staff noted that a wide variety of comments were received and stated that "[t]he following is a partial list of topics highlighted by Stakeholders for further consideration: the need for equitable evaluation of non-wires alternatives and other non-traditional technologies, the need for a coordinated generation analysis for all retirement decisions, and the contributions of energy efficiency to building electrification." *Id*., p. 12.

After consideration of the different proposals presented during the Integration of Resource, Transmission, and Distribution Planning workgroup's stakeholder meetings, stakeholder discussion, research of best practices in other states, and written feedback from stakeholder comments, the Staff made recommendations for utilities that are filing IRPs in the near-term filings prior to the finalization of the next MIRPP and IRP filing requirements update. The Staff did not recommend options for the long-term filings.

For utilities making a near-term filing, the Staff presented two options for additional modeling runs that provide slightly different paths toward achieving the ED 2020-10 net zero carbon emissions goal by 2050. The Staff recommended the Commission select one of the two options for utilities filing in the near-term and one option for multi-state utilities to meet the goals of ED 2020-10. In its recommendation, the Staff stated that:

> discussions will continue in Phases II and III of the MI Power Grid Advanced Planning processes work group on the development of a proposal for utilities filing after the next updates to the MIRPP and IRP Filing Requirements are approved by the Commission, expected in 2022. A proposal for the long-term filings will require updates to the MIRPP and IRP filing requirements, and its implementation will include any guidance from EGLE and the Council on Climate Solutions that is available to Staff at that time.

Id., p. 17.

The Staff recommended that multi-state utilities perform an additional modeling run that shows how the utility's Michigan service territory will meet the carbon emissions reduction goals set forth in ED 2020-20. The Staff stated that, alternatively, the Commission could allow multi-state utilities more flexibility to demonstrate compliance with the carbon emission reduction goals by requiring supporting testimony and exhibits that provide clear information from the multi-state utility's existing scenarios, illustrating an electrification and carbon neutral future in its Michigan service territory.

On February 18, 2021, the Commission issued an order requiring rate-regulated utilities filing near-term IRPs to provide two additional model runs in addition to the utility's scenarios and assumptions and those required by the MIRPP. The Commission also found that multi-state utilities making near-term IRP filings must provide supplemental information and perform two additional model runs. The Commission stated that:

> to achieve carbon neutrality by 2050, it is imperative that multi-state utilities that have resources serving Michigan load are on the same track as utilities located in

> Michigan. Therefore, modeling parameters, consistent with the Governor's goal of carbon neutrality by 2050, shall be developed by the stakeholder group tasked with updating the MIRPP and IRP filing requirements for multi-state utilities that are providing [l]ong-term filings.

February 18, 2021 order in Case Nos. U-20633 *et al*. (February 18 order), pp. 25-26.

The Commission thus ordered that, prior to the update to the MIRPP and IRP filing requirements in 2022, a Michigan rate-regulated utility filing an IRP pursuant to Section 6t of Act 341 shall perform two additional model runs in addition to the utilities' own scenarios and those required by the MIRPP. *Id*., pp. 27-28. The new scenario maintains the high load growth sensitivity of 1.5% from the Environmental Policy scenario and requires that the utilities demonstrate a 28% and 32% reduction in carbon emissions from their 2005 amounts by 2050. *Id*., p. 28.

III. THE COMMISSION STAFF'S MAY 27, 2021 REPORT

On May 27, 2021, in accordance with the August 20 order in this case, the Staff filed its report for Advanced Planning Phase II of the Integration of Resource, Distribution, and Transmission Planning workgroup. The goal of the report was to evaluate alternatives that provide the best value while resulting in a more efficient system and lower costs for ratepayers. In the order opening this case, the Commission directed the Staff to begin "outreach aimed at holding a series of stakeholder sessions, and to research best practices in the following areas:"

> 1. Potential ways to align distribution plans with IRPs and examination of best practices from other jurisdictions, including:
>
> a. Methodologies to develop distributed energy resource forecasts over a five- and ten-year period;
>
> b. Potential sources or methodologies to forecast electric vehicle (EV) penetration over a five- and ten-year period;
>
> c. Methodologies or frameworks to forecast the impact of the expected EV penetration on the load forecast over a five- and ten-year period; and

d. Methodologies or frameworks to evaluate non-wire alternatives (NWAs) such as targeted energy waste reduction and demand response in distribution plans and IRPs.

2. Identifying potential revisions to the Commission-approved IRP modeling parameters or the filing requirements to better accommodate transmission alternatives in IRPs in preparation for the next formal review of the Michigan IRP Planning Parameters expected to take place in 2022; and

3. Methodologies to quantify and value generation diversity in IRPs.

August 20 order, pp. 3-4 (footnote omitted). The Commission stated that it intended the stakeholder discussion to inform a foundation for potential changes to the MIRPP. *Id*., p. 4. Additionally, the Commission noted the issues related to the application of the Michigan Environmental Protection Act, MCL 324.1701 *et seq*. and the potential impact of utility plans on public health raised before the Commission. *See*, Case Nos. U-18418, U-18419, U-18461, and U-20471. To that end, the Commission directed the Staff to coordinate with EGLE on the inclusion of appropriate public health and environmental justice considerations in future IRP cases and to include a status update and any related recommendations in the May 27, 2021 report. August 20 order, p. 5.

In writing the report, the Staff held eight public forums between September 2020 and March 2021, engaging experts and stakeholders throughout the process. Through the workgroup efforts, the Staff engaged over 20 subject matter experts that represented national laboratories, federal research institutions, utility companies, transmission companies, environmental groups, various consultants, and stakeholders. Following the workgroups, the Staff requested feedback to expand on relevant topics explored.

Based on information from stakeholder meetings and participant feedback on specific topics, the Staff developed several recommendations for the Commission to consider. The report was

organized into six main subsections based on stakeholder feedback with recommendations in the following areas: resilience; forecasting; transmission planning; value of generation diversity; alignment of resource, distribution, and transmission planning; and emissions and environmental considerations.

Resilience

The SEA report highlighted several recommendations pertaining to resilience. Resilience, or "the robustness and recovery characteristics of utility infrastructure and operations, which avoid or minimize interruptions of service during an extraordinary and hazardous event" has been a key focus of the Commission in recent orders. SEA final report, p. 187. The topic of resilience was addressed directly by the Commission's Electric Distribution Planning workgroup. During the Electric Distribution Planning workgroup, two experts outlined perspectives on resiliency. One expert framed resiliency as the time for recovery from catastrophic events and the other framed resiliency as the avoidance of disruptions to the grid system altogether. May 27 report, p. 5. In its August 20, 2020 order in Case No. U-20147, the Commission outlined these frameworks for resilience and adopted a description of resilience "in terms of the ability to restore power following a [major] catastrophic event." *Id*. (citing August 20, 2020 order in Case No. U-20147, p. 48). The Commission added to this definition, stating "[t]he Commission also thinks about this term more broadly such as planning to mitigate more localized, high-impact outages caused by equipment issues, access limitations, or system configurations that inhibit timely restoration or back-up capabilities." *Id*. The Commission highlighted the vulnerability of loads that affect public health, safety, or security. *Id*., p. 49.

While resilience was not directly addressed in the Integration of Resource, Transmission, and Distribution Planning workgroup, this concept is inherently imbedded in conversations about

aligning planning practices and generation diversity. *Id*. The Staff built on the Commission commentary on resilience stating that "resilience could be thought of as those investments that maintain critical infrastructure and services like safe water, sanitary services, emergency response, hospitals, and communication during high impact, low probability events." May 27 report, p. 6. Based on this understanding of resilience, the Staff recommended that "utilities identify vulnerable loads within their service territory to foster discussion with Staff, stakeholders, and regulated utilities about how best to ensure those loads are integrated into planning processes." *Id*., p. 7. The Staff also recommended that future Electric Distribution Planning stakeholder sessions discuss the potential value that an environmental justice screening tool, the use of Customers Experiencing Multiple Interruptions (CEMI) metrics, and Customers Experiencing Long Interruption Duration (CELID) metrics can provide when considering vulnerable populations. *Id*., pp. ii, 7.

Forecasting

Load forecasting is one of the foundational steps in utility system planning as it analyzes the variables that affect electric load. The more accurate the data for variables such as economic, technological, regulatory, and demographic factors are, the better utilities can plan for both short and long-term electric load. A number of Commission proceedings depend on accurate load forecasting including IRPs, distribution investment and maintenance plans (distribution plans), transmission planning and peak load contribution calculations for regional transmission operators (RTOs), rate cases, energy waste reduction cases (EWR), power supply cost recovery (PSCR) cases, renewable energy plan (REP) cases, and capacity demonstrations.

The Commission addressed forecasting in its April 27, 2018 order in Case No. U-18419 (April 27 order), DTE Electric's request for three CONs, stating "[f]orecasting should include, among

other things, effects of demand-side management, environmental limitations, planning reserve margin and system reliability requirements, and other legislative and societal developments that will likely impact future energy requirements." April 27 order, p. 40.

The Commission also addressed forecasting in its November 21, 2018 order in Case No. U-20147 (November 21 order), the docket that is now the repository for electric distribution plans. To emphasize the importance of accurate load forecasting in planning and making investment decisions, the order stated:

> the Commission believes prudent planning and investments will require more sophisticated forecasting approaches to develop best practices and mitigate risks. The Commission seeks to avoid prescribing specific methods or approaches. . . but acknowledges that the Staff's recommended dynamic approach to load forecasting with scenario analysis could help better understand and accommodate uncertainty associated with DERs, PEV [plug-in electric vehicle] charging, and other factors.

November 21 order, p. 32.

In its May 27 report, the Staff stated that "[f]orecasting components may include building electrification, electric vehicle adoption, behind the meter resources, energy waste reduction (EWR), and any demand side resource that is not directly controlled by the utility and dispatched by the market." May 27 report, pp. 9-10.

The transition of utility systems towards DERs and increasing amounts of intermittent generation increases the complexity of load forecasting. To adequately assess the value of NWAs and DERs, utilities must start with an accurate net load forecast. The addition of DERs and NWAs to the electric system requires a shift from utility planning that focused solely on centralized base-load generation to planning that accounts for the increased reliability and affordability DERs and NWAs provide. As the Staff stated in its May 27 report, "[t]o adequately assess the value of these resources and determine the role various technologies should play in

serving load, utilities must start with an accurate net load forecast that identifies the needs of the utility's system." May 27 report, p. 9. As the Staff notes:

> It is important that DERs and NWAs are treated equitably and economically when compared to other resource possibilities analyzed in the IRP, which is used to select the most reasonable and prudent resources. If DERs and NWAs are not equitably valued in comparison to other capacity additions, then they will continue to be incorporated into the resource plan as an afterthought and the value they provide to the system may not be fully accounted for.

Id., p. 10. The Staff report noted that "[t]he current aggregated approach for forecasting DERS, EWR, and DR [demand response] does not allow for equitable treatment." *Id*.

The Staff recommends that utilities take a componentized or modular approach to creating all forecasts used in the IRP model, clearly documenting the assumptions, data, and methodology used for each component. As the Staff states, "[f]orecasting components separately and then aggregating them into a net load forecast . . . creat[es] a clearer understanding of the impact of each forecast component and associated assumptions about the overall forecast." *Id*.

While more traditional generation resource options are evaluated based on the energy and capacity they provide, alternative solutions like DERs and NWAs often provide value through other services, such as ancillary services, grid support, and deferment of grid investments. The Staff would like to see greater granularity (hourly, daily, monthly, yearly) in the forecasts used for load to properly account for the value stream of non-traditional resources that often require more localized and granular operating data. The Staff states that "[w]ithout more granular data that can account for all the value streams of these non-traditional resources, they cannot be compared equitably to traditional resources to address a system need." *Id*., p. 16. The Staff recommends granular load data include gross demand and energy forecast; gross load shape; load shapes for EWR, DR, and other load modifying resources that are not being modeled as resources (i.e. already implemented EWR or EWR achieved outside of utility EWR programs); EV adoption and

charging profiles; and behind the meter resources and DER forecasts that include customer-owned photo-voltaic and storage. *See*, May 27 report, p. 21.

The Staff recommends system-level forecasts be consistent across resource, distribution, and transmission planning processes. The Staff states that "[a]ligning distribution planning with resource and transmission planning begins with consistent system forecasts and scenario assumptions." *Id*., p. 12. The Staff recommends that, as a default, the underlying assumptions and drivers used in system-level forecasts should be consistent from one planning process to the next while recognizing that the time horizons, required data granularity, and objectives of each planning process differ in some regard. *Id*., pp. 13, 15-16. The system-level assumptions used in the base forecast for an IRP should be consistent with those used in a distribution plan and, for time periods covered by both plans, completed at roughly the same time. *Id*., p. 13. Additionally, relevant utility regulatory filings should use forecasts consistent with those used in planning processes when the filings use forecasts similar to, or derived from, resource, distribution, and transmission planning (e.g., PSCR plans, EWR plans, rate cases, REPs, RTO Resource Adequacy Construct, RTO Peak Load Contribution, etc.). The Staff states that "[u]tility filings with the Commission should illustrate forecasting alignment and provide evidence that supports the Company's approach to maintaining consistency between forecast components across planning processes." *Id*. The Staff also recommends that there be further discussion in future distribution planning workgroups to align forecasting. *Id*., p. iii.

The Staff recommends that utilities increase external transparency by providing forecast methodologies for all forecast components, sharing public resources used when available, and clearly documenting in the filing or workpapers how forecasts have been revised from one case to another across all cases filed at the Commission. As the Staff stated in its report "it is important

that the utility is clear and transparent with their methodology and assumptions so stakeholders and the Staff understand and can contribute to the discussion about methodology and assumptions." *Id*., p. 9. When utilities use proprietary resources, regulators and stakeholders are unable to critically examine the assumptions, techniques, and results of load forecasting. The Staff is also unable to replicate utility forecasts during the IRP review process. The benefit of being able to use both public and private resources is that utilities can use the most accurate data for their forecasting need. *Id*., p. 19.

The Staff recognized that forecast methodologies can be complex, data intensive, and differ between utilities due to their different business models, service territories, and customer profiles. The Staff recommends that "[w]here there are limitations in the ability of a particular planning model to capture all potential value streams of a resource, resource decisions should be supported by modeling results from separate modeling processes that allow for adequate consideration of all value streams of a resource, where reasonable and applicable." *Id*., pp. iii, 19.

Transmission Planning

Transmission planning is carried out by the seven investor-owned, municipal, and cooperative transmission-owning utilities in the state of Michigan in conjunction with their respective RTO or Independent System Operator (ISO). These organizations are responsible for operating the transmission system and wholesale electricity markets, dispatching generation, ensuring reliability, and planning the bulk electric system over large geographic areas. May 27 report, pp. 24-25. RTOs and ISOs plan transmission systems to ensure reliability during severe conditions and enable state and federal policies to ensure long-term reliability.

DTE Electric was the first utility to file a transmission analysis under the current certificate of public convenience and necessity application instructions. In the April 27 order, the Commission

encouraged DTE Electric to continue to coordinate with the independent system operator and transmission company on reliability planning. Regarding DTE Electric's 2019 IRP, submitted on March 29, 2019, in Case No. U-20471, pursuant to MCL 460.6t, the Commission stated that it:

> expects a far more robust analysis of transmission opportunities that might defer, displace, or optimize the amount, type, and location of additional generation based on up-to-date information about current and expected transmission system conditions and import/export capabilities. To ensure alternatives are fully considered in future IRP proceedings, and the system is optimized from a cost and reliability standpoint, the Commission also expects DTE [Electric] to work closely and collaboratively with ITC [International Transmission Company] and other transmission owners to explore transmission solutions and to work toward integrating the company's distribution planning efforts with resource planning.

April 27 order, p. 115.

Consumers was the first utility to file under the IRP filing requirements promulgated pursuant to MCL 460.6t, including the Section XII transmission analysis requirements. Consumers' IRP case ended in a settlement agreement, but the Commission briefly addressed the transmission requirements of the IRP. In its June 7, 2019 order in Case No. U-20165 (June 7 order), the Commission stated:

> [l]ooking ahead to Consumers' filing of its next IRP in 2021, the Commission expects that Consumers will work in close collaboration with METC [Michigan Electric Transmission Company] and will provide METC a thorough and timely retirement analysis of its aging generation units and new resource plans to allow for a more accurate and in-depth analysis of transmission issues in its next IRP.

June 7 order, p. 90. The Commission also directed Consumers to explore the possibility of integrating resource and distribution planning in its next IRP, stating that "[a] holistic review of energy infrastructure options and customer trends, such as adoption of renewable energy, EWR, and electric vehicles, is essential to optimize investments of ratepayers." *Id*., pp. 90-91.

Finally, the Commission addressed transmission planning in its December 6, 2019 order in Case No. U-20350 (December 6 order), Upper Peninsula Power Company's IRP. In that order,

the Commission stated that, "[t]o approve a new [generation] unit, the Commission expects a more robust consideration of generation alternatives and associated transmission and operability reliability impacts." December 6 order, p. 41. The Commission also stressed the importance of examining near-term operational impacts associated with long-term planning decisions and having the transmission owner weigh in on transmission issues. *Id*., p. 42.

As the Commission's statements in these three cases indicate, there is a need for more robust and complete transmission analysis in IRP proceedings. The Staff recommends the utilities achieve more holistic transmission planning by enhancing communication between utilities and transmission owners and working toward a higher level of information transparency. The Staff recommends that utilities enhance communication by facilitating information sharing between utilities and transmission owners. The Staff recommends that regulated utilities and transmission owners coordinate to schedule formal biannual meetings to discuss the regulated utilities' emerging or expected distribution system needs, generation resource fleet changes, and how the transmission system may best support those changes. May 27 report, p. 37. While the Staff recognizes that utilities and transmission owners already meet regularly and collaborate, the Staff posits that a formalized process would ensure that necessary collaborations do occur early in the IRP development process and with regular frequency.

The Staff recommends that the utilities increase transparency by using information from the most recent RTO reliability planning models when possible, work collaboratively with the transmission operator to evaluate and provide results, and encourage stakeholder participation in existing transmission planning processes. The Staff recommends that the Commission consider revising its IRP filing requirements to require that regulated utilities request a transmission analysis that does the following to inform its resource decisions:

1. Utilize the most recent relevant RTO reliability planning models that have been finalized in a Midcontinent Independent System Operator (MISO) transmission expansion planning (MTEP) process or PJM Interconnection, L.L.C. (PJM) regional transmission expansion plan (RTEP) process at the time of IRP development;

2. Evaluate the reliability considerations of the utilities' proposed course of action, recognizing refinements may be made by the time an IRP is filed; and

3. Evaluate the reliability, costs, and resource diversity benefits of transmission organization (TO) proposed transmission alternatives.

Additional analysis that regulated utilities should include with IRP filing materials if provided by the TO or RTO should include:

1. Studies that identify system locations or regions where new resources can interconnect to the transmission system with minimal transmission investment;

2. Studies that identify system locations or regions where generation resources could address future transmission system reliability issues; and

3. Studies that identify and estimate the cost of upgrades that would increase the local capacity import limits (CIL) and capacity export limits (CEL) and impacts to the local clearing requirement (LCR).

May 27 report, p. 38 (footnote omitted).

The Staff recommends that all studies that support a utility's proposed course of action and the transmission or alternative analysis be provided in the IRP case record to the extent possible. The Staff also recommends that all requests for transmission studies and information be documented by utilities and included in IRP materials. May 27 report, p. 38.

Value of Generation Diversity

As utility resource portfolios continue to evolve, including retirement of coal and nuclear generation units and the addition of natural gas and renewable resources, generation diversity becomes important to assure overall system integrity, reliability, and resiliency through any fluctuation in price or resource availability. The more diverse a generation portfolio is, the lower the risk the system will be impacted by potential severe weather events, price volatility, or

interdependency with another economic sector that may result in higher production costs. A lack of generation diversity can increase the reliance on one fuel source, increasing the utility's risk of having to purchase resources from the market to meet load requirements when the market conditions are unfavorable. *See*, May 27 report, p. 43. Utility planning processes seek to provide a portfolio that balances system costs with these associated risks.

The Commission addressed generation diversity in the SEA and recommended "that the value of diversity in power supplies be quantified as part of future integrated resource plans filed by electric utilities." SEA final report, p. iii.

Diversity generally evaluates variety, or the number of categories of generation; balance, or how evenly dispersed these categories are; and disparity, or how different the categories are from one another. May 27 report, p. 40. There are three well-established indices for calculating diversity, the Stirling, Shannon-Wiener, and Simpson indices. Each index weights the components used to calculate generation diversity differently. Indexing generation diversity provides a high-level interpretation of a resource portfolio's ability to mitigate risk and provide system reliability but ultimately fails to provide sufficient detail for meaningful insight or to guide decision making. May 27 report, p. 52. The Staff recommends that the utilities internally track state-wide generation diversity using the Modified Simpson, Stirling, and Shannon-Wiener indices based on both energy and capacity for the IRP planning horizon of 15 years, at 5-year intervals. *Id*., p. 53. The Staff recommends the utilities update the current year indices annually, with projected years being updated after each IRP.

Risk analyses seek to evaluate resource portfolios against a variety of hypothetical future scenarios to determine the impact these scenarios could have on system characteristics. The mathematical analysis for risk assessment can be either deterministic, meaning it uses a

predetermined set of parameters to test a specific outcome, or stochastic, meaning it uses randomized parameters to assess multiple potential and varied outcomes. The desired outcome of generation diversity is that a resource portfolio is capable of meeting load under a wide range of circumstances. Running plans through a combination of deterministic and stochastic analyses will lead to the selection of more diverse portfolios. May 27 report, pp. 52-53.

Currently, utilities are required to perform risk assessments as a part of the IRP process. The MIRPP provides specific scenarios and sensitivities that must be modeled in the IRP in addition to any scenarios and sensitivities the utility has created. *Id*., p. 45. The Staff recommends that utilities conduct a stochastic risk assessment for the proposed course of action in their IRP, all optimized plans generated from the MIRPP scenarios, and optimized plans generated on any utility-created scenarios. *Id*., p. 53. The Staff supports the use of deterministic risk assessment when deemed valuable by the utility, but the use of deterministic assessments should be reasonable to assess the performance of a plan under a particular set of variables. *Id*.

The Staff recommends that the results of stochastic analyses be represented graphically to clearly convey probability distributions and the relative positions of distributions. *Id*. This will allow for a direct comparison of the proposed plans. Graphic representations may include a box and whisker plot or an efficient frontier plot. The Staff also recommends using a matrix to display each optimized plan when run through each combination of scenarios and sensitivities.

Lastly, the Staff recommends continued collaboration with stakeholders to further develop Staff's understanding of generation diversity and risk assessment. *Id*.

Alignment of Distribution Planning, Integrated Resource Planning, and Transmission Planning

Integrated resource planning, distribution planning, and transmission planning are three essential components to ensuring safe, reliable, and accessible energy at reasonable rates. These

three planning processes are currently designed, modeled, and run separately. The Staff states that "aligning these planning processes would facilitate holistic grid solutions and efficient integration of new technology and distributed generation to ensure that ratepayers are able to access all the benefits of a fully integrated electric system." *Id*., p. 56.

Beginning in February 2019, the Commission participated in a task force on comprehensive electricity planning through a partnership between the National Association of Regulatory Utility Commissioners (NARUC) and the National Association of State Energy Offices (NASEO).[4] The purpose of the task force was to develop new pathways for aligned electric planning. The task force explored a set of issues that closely align with the work of the Integration of Resource, Distribution, and Transmission Planning workgroup. The final year of the task force effort occurred simultaneously with the MI Power Grid efforts overseen by the Commission. May 27 report, p. 55.

During the September 24, 2020 stakeholder session, DTE Electric, Consumers, and I&M presented utility perspectives on alignment. Each utility is at a different point of integrating resource, distribution, and transmission processes, all trending toward more robust coordination and alignment between the various planning processes. *Id*. The three investor-owned utilities saw similar challenges in achieving full integration of planning processes. Differences in scope, objectives, and planning horizon pose a challenge when attempting to align these processes. The traditional approach to planning also does not facilitate the level of information sharing needed to integrate resource, transmission, and distribution plans. Data availability, information technology

[4] May 27 report, p. 55 (citing Task Force on Comprehensive Electricity Planning, NARUC, available at www.naruc.org/taskforce).

infrastructure, personnel skill sets, and insufficient modeling tools limit alignment due to added complexities a fully integrated planning process requires. *Id*., p. 56.

The Staff recommends that the utilities increase consistency throughout the planning processes and coordination of timing between processes to ensure the information flow from one process to another is consistent and accurate and to create a link between various inputs, outputs and resulting decisions. The Staff also recommends increased communication and transparency in the resource, transmission, and distribution planning processes both within the utility organization and with stakeholders. Lastly, given the above recommendations, the Staff recommends that utilities engage in planning as an iterative process to provide a clear picture of how resource, transmission, and distribution planning process can impact and support one another.

Emissions Recommendations and Environmental Justice Considerations

In the February 20, 2020 order in Case No. U-20471 (February 20 order), the Commission stated that:

> [i]n future IRP proceedings, the Commission expects to coordinate with EGLE on the inclusion of public health and environmental justice considerations as part of the environmental information EGLE shares with the Commission under Section 6t. Public health impacts are inherent in EGLE's responsibilities as an environmental regulator, as many laws, rules, and permitting requirements are tied back to health and environmental indicators.

February 20 order, p. 46.

As a part of the current MIRPP, developed in 2017, the Commission identified significant environmental regulations and laws that affect electric utilities. EGLE has provided an advisory opinion for each IRP regarding the utilities' level of compliance with the applicable environmental regulations, laws, and rules in accordance with Act 341. MCL 460.6t(7) .

MI Healthy Climate Plan

EGLE was tasked by ED 2020-182 to expand its environmental advisory opinion filed during the IRP process. To that end, the Staff has met with EGLE's Environmental Justice (EJ) Public Advocate and EGLE technical staff on an ongoing basis over the past year. These meetings include EGLE technical staff from EGLE's Air Quality Division, Water Resource Division, Materials Management Division, and Remediation and Environmental Redevelopment; EGLE executive staff; the EJ Public Advocate; and the Commission Staff, Commission advisors, and the Commission's Chief Operating Officer. May 27 order, p. 68. The topics of the meetings have included additional potential environmental, public health, and environmental justice data needed to support an informed advisory opinion. The Commission and EGLE mutually developed a proposed list of additional environmental considerations for upcoming IRPs. The Staff is working closely with the utilities to coordinate the appropriate data filings.

Additionally, the Staff has held two MI Power Grid stakeholder meetings focused on environmental justice topics, presented IRP information to the Michigan Advisory Council on Environmental Justice, considered related comments from the Council, and attended the multi-day Michigan Environmental Justice Conference presented by the Environmental Justice Advocate, Michigan Advisory Council on Environmental Justice, the Michigan Interagency Environmental Justice Response Team, and EGLE. The Staff recommends conversations on including an environmental justice and public health analysis be revisited during Advanced Planning Phase III of the Integration of Resource, Distribution, and Transmission Planning workgroup.

Stakeholder Comments in Response to the December 15, 2020 Report

Following the Staff's December 15 report on emission reporting requirements for utility IRPs, stakeholders were given an opportunity to file comments in this docket. Comments were due by

January 12, 2021. The Commission received comments from Michigan Environmental Justice Coalition, DTE Electric, I&M, Upper Michigan Energy Resources Corporation, Consumers, Environmental Law and Policy Center, ABATE, Great Lakes Environmental Law Center, and a joint comment from MEIBC and Advanced Energy Economy.

The comments primarily address two issues. The first being the projection of load growth in a carbon neutral future. Some stakeholders project a significant increase in load growth due to electrification, while others commented that this projection is still uncertain. All parties agreed that load growth is not likely to be linear. May 27 report, p. 64. The second issue being the appropriate level of carbon reduction that should be expected from the electric sector as compared to other sectors to achieve the economy-wide carbon emission reductions established in ED 2020-10. Commenters offered varying views ranging from the view that all emission reductions necessary by 2025 should be achieved by the electric sector, assuming the continuation of decarbonization trends in other sectors, to all other sectors being responsible for a proportionate reduction in emissions in their respective sector. *Id*.

In its February 18 order in the present case, the Commission adopted the Staff's December 15 straw proposal and directed the utilities filing near-term IRPs to conduct two additional model runs. After the February 18 order, stakeholders asked for clarification regarding the appropriate values to use when modeling market sales. The Staff met with the three utilities filing near-term IRPs. No consensus was reached, but utilities are expected to support their market carbon emission assumptions in their IRP filings. May 27 report, p. 65. The Staff recommends further consideration be given to counting market carbon emissions during Advanced Planning Phase III of the Integration of Resource, Distribution, and Transmission Planning workgroup. The Staff

also recommends that any direction from EGLE be integrated into the IRP process when updated MIRPP and IRP filing requirements are drafted. *Id*.

IV. DISCUSSION

The Commission thanks the Staff, utilities, and other stakeholders for their participation and their contributions to Advanced Planning Phase II of the Integration of Resource, Distribution, and Transmission Planning workgroup. The Commission would like to emphasize the importance of resource, distribution, and transmission planning as the industry transitions from centralized base-load generation to the increased use of DERs. The Commission aims to streamline this transition by better aligning electric distribution plans with IRPs to develop a cohesive and holistic process that allows utilities to optimize investments while considering cost, reliability, resiliency, and risk.

The importance of resource, distribution, and transmission planning becomes especially poignant as the electric grid is impacted by the increasing effects of climate change and extreme weather conditions. The Commission's August 25, 2021 order in Case Nos. U-21122 *et al*. (August 25 order) focused on the issues of reliability, resilience, and readiness for these extreme events. As stated in that order, "[r]atepayers have a right to expect the utilities to anticipate extreme weather events, to provide a hardened grid that can withstand extreme weather, and to be prepared to restore power expediently when the grid fails; and the Commission is committed to implementing improvements in these areas." August 25 order, p. 3 (footnote omitted). As the August 25 order stated, the pace of climate change dictates that such events will likely become more frequent and planning must be responsive to this reality. Thorough consideration of forecasting, transmission planning, generation diversity, and the alignment of these planning processes is necessary to assure that electricity can be delivered reliably to customers, notwithstanding the inevitable impacts extreme conditions will have on the electric grid.

The Commission acknowledges that the issues surrounding resource, distribution, and transmission planning are extensive and impact a wide range of cases currently before the Commission for consideration. There are several open dockets addressing the issues of grid reliability, resiliency, and extreme weather events. Thus, while not soliciting comments in the present docket, the Commission encourages interested persons to file comments regarding the electric distribution plans filed by Consumers on June 30, 2021, DTE Electric on August 2, 2021, and I&M on July 30, 2021, in Case No. U-20147 no later than 5:00 p.m. (Eastern time (ET)) on October 1, 2021.[5] The Commission recognizes that these electric distribution plans will be finalized prior to the October 1 filing deadline. The Commission does not expect additional comments to impact the contents of the previously finalized plans. However, the Commission expects the three utilities to consider comments filed in Case No. U-20147 as part of the continuing electric distribution plan discussion.

As noted in the August 25 order, the Commission is also hosting a Technical Conference on Emergency Preparedness, Distribution Reliability, and Storm Response. While this was originally planned as an in-person Technical Conference, given the continued high COVID-19 case numbers and the extension of the return to in-office transition plans for state employees to October 31, 2021, the Commission is amending its plans and will host the Technical Conference as a virtual event that will allow participation through video/teleconference only. Day one of the Technical Conference will take place on October 22, 2021, and the date for the second day of the Technical Conference will be posted to the docket in Case No. U-21122 in the near future. Information on

[5] The Commission also sought comments regarding whether it remains appropriate to rely on historical data in utility planning processes given the increasing incidence and severity of extreme weather events in Case No. U-21122.

how to participate will also be made available in the Case No. U-21122 docket no later than October 4, 2021.

Advanced Planning Phase III of the Integration of Resource, Distribution, and Transmission Planning workgroup will specifically visit the MIRPP, IRP filing requirements, and Demand Response and Energy Efficiency Studies which are required to be evaluated every five years under MCL 460.6t(1). Therefore, the Commission directs the Staff to create a redline version of the MIRPP published on November 21, 2017, that reflects the recommendations proposed by the Staff in the May 27 report and reflected in this order, feedback from stakeholders of the MI Power Grid workgroup, and the directives for building a carbon-neutral Michigan pursuant to ED 2020-10. The Staff shall distribute this redline version of the MIRPP to stakeholders not later than December 22, 2021.

In accordance with Act 341 and Section 6t(1)(i), before issuing the final modeling scenarios and assumptions that each electric utility must include in developing its IRP, the Commission shall receive written comments and hold a hearing to solicit public input regarding the proposed modeling scenarios and assumptions.

THEREFORE, IT IS ORDERED that:

A. The Integration of Resource, Distribution, and Transmission Planning Report is accepted, and recommendations therein are adopted, as set forth in this order.

B. The Commission Staff shall create a redline version of the Michigan Integrated Resource Planning Parameters for review by stakeholders in the MI Power Grid Advanced Planning Phase III process and distribute this document to stakeholders no later than December 22, 2021, following the guidance of this order.

C. The Commission Staff shall provide stakeholders with 30-day notice prior to convening the next round of stakeholder meetings for Advanced Planning Phase III of the Integration of Resource, Transmission, and Distribution Planning MI Power Grid workgroup and provide the redline version of the Michigan Integrated Resource Planning Parameters and Integrated Resource Plan Filing Requirements to stakeholders as part of this notice.

D. The Commission Staff shall file its final draft of the Michigan Integrated Resource Planning Parameters on June 30, 2022, in a new docket to be opened on the Commission's own motion to update the Michigan Integrated Resource Planning Parameters.

E. The Commission Staff shall file its final draft of the revised Integrated Resource Plan filing requirements on June 30, 2022 in Case No. U-18461.

F. The Commission will convene a Technical Conference on Emergency Preparedness, Distribution Reliability, and Storm Response. Day one of this Technical Conference will take place on October 22, 2021, and the date for the second day of the Technical Conference will be posted to the docket in Case No. U-21122 in the near future. The Technical Conference will be held utilizing a virtual platform allowing for participation through video and teleconference. Information on how to participate will also be made available in the Case No. U-21122 docket no later than October 4, 2021.

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 mpscedockets@michigan.gov and to the Michigan Department of the Attorney General - Public Service Division at pungp1@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

Tremaine L. Phillips, Commissioner

Katherine L. Peretick, Commissioner

By its action of September 24, 2021.

Lisa Felice, Executive Secretary

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

STATE OF MICHIGAN)

Case No. U-20633 *et al.*

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on September 24, 2021 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 24th day of September 2021.

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

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