

Energy Affordability and Accessibility Collaborative

U-20757 Interim Progress Report

December 17, 2021



Table of Contents

Executive Summary	i
Introduction	1
Commission Directives	1
Section 1: Ongoing COVID-19 Response, Collaboration and Communication	3
Introduction	3
Communications Materials	3
Ongoing Formal and Informal Collaborations	4
Section 2: Shutoff and Arrearage Data	8
Commission Charge	8
Public Access	8
Section 3: Energy Waste Reduction Low-Income Workgroup	
Section 4: Energy Affordability and Accessibility Collaborative	11
Introduction	
Determining Relationship With EWR-Low Income Workgroup	
Survey results	
EAAC Webpage	
EAAC Structure	
Meetings	
Subcommittees	
Definitions – Ad Hoc Subcommittee	
Affordability, Alignment and Assistance Subcommittee	23
Outreach and Education Subcommittee	
Data and Regulatory Analysis Subcommittee	

Discussion on the future of the EAAC	
EAAC Next Steps	
Recommendations	
EAAC Specific Recommendations	
General Recommendations	
Conclusion	
Appendices	
Appendix A: Acronyms List	
Appendix B: Energy Security Definition Sources	
Appendix C: Acknowledgements	40
Appendix D – Subcommittees Participant List	
Appendix E - Survey Results	45
Appendix F – Additional Resources	47

Executive Summary

The Michigan Public Service Commission (Commission) issued an order on February 18, 2021 in Case No. <u>U-20757</u> that included a directive for Staff to convene the Energy Affordability and Accessibility Collaborative (EAAC) in coordination with the Energy Waste Reduction Low-Income (EWR-Low-Income) Workgroup to address the Staff's recommendations in the <u>U-20757</u> <u>Collaboration and Communication Process</u> report regarding the Commission's ongoing COVID-19 response; affordable payment plans; affordable energy bills; data collection, transparency, and analysis; review of rule-based protections; and communication and engagement, as described in the order. The Commission further directed Staff to file an interim report to the *U-20757* docket on progress made and any recommendations no later than December 17, 2021.

This report provides an update on Staff collaborations and communications in response to COVID-19 and summarizes the process for creating the Energy Affordability and Accessibility Collaborative in consultation with the Energy Waste Reduction Low-Income Workgroup, the establishment of the collaborative structure with four subcommittees, and the work undergone by the EAAC in response to the Commission's directives to date.

Staff views the EAAC as a unique intersection of state agencies, utilities, advocacy groups and human service agencies. The monthly EAAC meetings, subcommittee meetings and outside discussions brought together organizations that do not always interact. The result was an opportunity for state program experts to explain processes in detail and for advocacy groups to question these processes and pose ideas for a different vision for helping customers stay healthy and connected.

Staff acknowledges that while the EAAC provided enhanced collaboration across the government, advocacy, human services and utility sectors, representation from high energy burden, historically marginalized populations and communities was missing. In addition, the group lacked racial and ethnic diversity. A primary goal of the EAAC from the outset and continuing into 2022 is to build trusted relationships that creates a safer environment for individuals and organizations representing high energy burden and racially/ethnically diverse communities to bring meaningful input to policy discussions.

Terms such as racially diverse, diverse or historically marginalized populations have been used in this report to refer to groups of people and communities. Staff recognizes that part of inclusively expanding outreach and communication includes utilizing language and phraseology that accurately and respectfully represents the way members of the community identify themselves. Staff also understands that any single phrase or term will not successfully accomplish this goal. It is important that Staff acknowledge this reality and commit to continued discussion on how we talk about ourselves and refer to others as the EAAC continues this work.

Staff would like to thank the stakeholders who generously gave of their time to participate in both the EAAC meetings and the subcommittee meetings. Without the dedication of advocacy groups, human service agencies, intervenors and utilities, this process of building a more efficient, effective

system that better protects customers and distributes available energy assistance would not be possible. Staff would especially like to call out the intensive work of the stakeholder subcommittee co-leads:

- Ad-hoc Definitions: Mary Wilkins, Salvation Army
- Affordability, Alignment and Assistance: Amy Bandyk, Citizens Utility Board (CUB); Tanya Paslawski, National Association of Regulatory Utility Commissioners (formerly with 5 Lakes Energy); and Kristen Bolds, Society of St. Vincent de Paul
- Outreach and Education: Briana DuBose, EcoWorks; and Briana Parker, Elevate

Introduction

The Michigan Public Service Commission (Commission) issued an order on February 18, 2021 in Case No. <u>U-20757</u> (or Order) that included a directive for Staff to convene the Energy Affordability and Accessibility Collaborative (EAAC or Collaborative) in coordination with the Energy Waste Reduction and Low-Income Workgroup (EWR-LI) to address the Commission Staff's recommendations in the <u>U-20757 Collaboration and Communication Process</u> report regarding the Commission's ongoing COVID-19 response; affordable payment plans; affordable energy bills; data collection, transparency, and analysis; review of rule-based protections; and communication and engagement.

The Commission also ordered investor-owned utilities to continue to file monthly reports in the U-20757 docket using the updated Commission Staff template detailing the data on disconnected service and arrearages forming a base of data for staff and stakeholders to better understand the current state and trends related to shutoffs and arrearages. The Commission adopted Staff's recommendation to make this data publicly available in a protected, more easily analyzable form, the outcomes of which are summarized in the report.

This report represents the Commission's directive for Staff to provide an update on progress made since the order in Case No. U-20757, including any recommendations by the Collaborative to date.

Commission Directives

This section outlines the Commission directives for Staff collaborations and the EAAC from the Order:

- Instructs Staff to form the Energy Affordability and Accessibility Collaborative (EAAC or Collaborative) and directs the Staff to convene the Collaborative for the purpose of addressing recommendations set forth in the Staff Report, as described in this order:
 - To not overtax the time and resources of participants by requiring participation in two separate collaboratives, the Commission directs Staff to explore via discussions with the EWR Low-Income Workgroup how best to coordinate with the EAAC.
 - The Commission further directs Staff and the EWR Low-Income Workgroup to consider and explore the option of including the EAAC within the EWR Low-Income Workgroup.
- Directs Investor-Owned Utilities (IOUs) to continue to file monthly reports in this docket using the updated Staff template detailing the data on disconnected service to occupied and unoccupied residences and arrearages.
- Adopts the Staff recommendation to make this data publicly available in a protected, more easily analyzable form.
- Adopts the Staff recommendation to simplify the energy assistance and customer protection systems by convening a collaborative in coordination with the EWR Low-Income Workgroup to accomplish the following three tasks:

- Study the alignment of income eligibility across energy assistance programs and customer protections, including studying the impacts of expanding eligibility to 200% of the federal poverty level (FPL); and under Commission jurisdiction, aligning application processes if beneficial.
- Analyze the application, eligibility determination, and program design for the various assistance programs and utility-based credits; additionally making recommendations for alignment and simplification.
- Direct utilities to pilot the targeting of communications so that recipients of an energy assistance program will be alerted to eligibility for energy efficiency programs.
- Adopt a common definition of energy affordability and energy self-sufficiency and include in the interim status report an updated progress on developing these definitions¹.
- Streamline and improve APPs including the application of percentage of income payment plans (PIPPs). consider the objectives set forth on pages 37-38 of the <u>U-20757 Staff Report</u>, and work with the EWR Low-Income Workgroup on this issue.
- Develop recommendations for a Long-Term Data Collection Strategy, including:
 - Reviewing demographic information such as race, gender, income, and zip code information in gathering demographic information.
 - Coordinating with the MPSC Diversity Equity and Inclusion Committee (DEI).
 - Participate with the National Association of Regulatory Utility Commissioners (NARUC) on Resolution 51.
- Review of Rule-based Protections Part 7 of the Commission's billing rules, Mich Admin Code R 460.128 *et seq*.
- Communication and Engagement:
 - Continue with on-going formal and informal collaborations.
 - Establish regular mechanisms for stakeholders to provide input on improving communication and materials.
 - Broaden the outreach to groups traditionally not a part of utility communications.
- Continue monthly shutoff and arrearage data submission for investor-owned utilities in the U-20757 docket using the updated Commission Staff template. Establish site for monthly data submissions to be publicly available in a protected, more easily analyzable form.

The work completed by Staff and stakeholders in response to the order has followed two tracks.

- 1. Ongoing staff work related to COVID-19 response, collaboration, and communication.
- 2. The development and implementation of the Energy Affordability and Accessibility Collaborative.

The report is divided into two major sections to reflect these two work streams.

¹ Refer to p. 37 of the <u>Staff Report</u> for guidance

Section 1: Ongoing COVID-19 Response, Collaboration and Communication

Introduction

Staff continued to work throughout 2021 to maintain mechanisms for timely communications with stakeholders. Staff's goal was to continue the strong collaboration with utilities, other state departments, human service agencies, and advocacy groups that was formed during in response to the emergence of COVID-19 in 2020. In collaboration with the MPSC Communications Section, Staff is continually evaluating stakeholder feedback, regional and national best practices, and outreach and education outcomes to improve its communication and outreach strategies.

The MPSC's ongoing COVID-19 response related to customer assistance and protections has also been positively impacted by the intensive involvement of stakeholders in the EAAC. The discussions held in the EAAC meetings surfaced immediate concerns that were brought to decision makers for problem solving. This includes comments on the backlog of Southeast Michigan applications for the COVID Emergency Rental Assistance (CERA) program and the desire for clarity on prioritizing customer applications.

Below is a summary of the activities Staff engaged in during the year, not only to ensure a nimble COVID-19 response, but to develop a continuous improvement loop on communications, outreach, and program design.

Communications Materials

In 2020 during the COVID-19 pandemic, the MPSC created a robust communication strategy that endeavored to reach diverse communities through a wide range of mediums, including social media, updates to the MPSC website, video messages, written materials and press releases.

Over the past two years the MPSC widened its outreach to include non-traditional utility stakeholders such as the Area Agencies on Aging, the Michigan Nonprofit Association, the Michigan Disability Network, the Michigan Catholic Council, the Michigan Municipal League and Volunteers of America. Staff regularly update educational materials as information and programs change. These materials are made available on the MPSC website in multiple locations, as well as to customer advocacy groups, non-profit human service agencies including the MEAP grantees, the Coalition to Keep Michigan Warm, legislators, state agencies, and utilities.

The MPSC works strategically with community partner organizations who work with, in, and are members of these communities. By partnering with individuals and organizations that are trusted by members of impacted communities, information and resources provided by the MPSC are able to reach and assist more individual customers in those communities. The EAAC Outreach and Education Subcommittee as well as the MI Power Grid Customer Education and Participation Workgroup are developing strategies to assist the Commission in reaching vulnerable customers and at-risk communities and updating materials and policies with input from these communities.

The MPSC's ongoing education and outreach efforts include updated educational materials in the form of a Winter Heating Season Communications Tool Kit, which will be distributed in December of 2021 to advocacy groups, utilities, human service agencies, and associations. The toolkit contains a number of communication materials including post cards, brochures, example letters, example social media messages, and video message files. In addition, the toolkit includes materials translated into Simple Chinese, Bengali, Spanish and Arabic. Staff also developed an overview of all government or rate payer energy assistance programs, funding sources and eligibility guidelines, and has made this available to participants in the Energy Affordability and Accessibility Collaborative and the Energy Waste Reduction Low-Income Workgroup.

Ongoing Formal and Informal Collaborations

Low-Income Energy Assistance MDHHS/Utility/MPSC Meetings

In 2021 Staff met biweekly with the regulated utilities including the Michigan Electric and Gas Association (MEGA), and the Michigan Department of Health and Human Services (MDHHS) program and policy staff to trouble-shoot ongoing issues resulting from COVID-19. Meetings in winter and spring focused on shutoffs, restorations, and customer protections. After the passage of the American Rescue Plan Act (ARP Act), attention turned to discussion of programmatic options for optimally serving customers with federal funds, including better understanding and facilitation of the <u>COVID Emergency Rental Assistance Program (CERA)</u>. Discussions during fall meetings in 2021 centered on the implementation of the Low-income Home Energy Assistance Program (LIHEAP) Direct Support program and the development of consistent communications on available energy assistance.

LIHEAP Direct Support

When the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) was implemented last year, the MPSC worked with MDHHS and the largest regulated utilities to develop the Low-Income Home Energy Assistance Program² (LIHEAP) Direct Support. The MPSC worked with MDHHS and regulated utilities in Michigan throughout the summer of 2021 to update this program for implementation with the American Rescue Plan ARP Act LIHEAP funds. The program's goal is two-fold: 1) to distribute crisis energy assistance to customers at risk of shut-off as quickly and easily as possible; and 2) to free up local DHHS office resources to serve at risk customers who are new to receiving energy assistance. LIHEAP Direct Support allows eligible customers to have unpaid balances on their energy bills paid directly to their utility. The customer must already be receiving Supplemental Nutrition Assistance (SNAP) or cash assistance (FAP). Arrearages³ up to the

² LIHEAP is the federal Low Income Home Energy Assistance Program distributed annually to states for heating, cooling and crisis assistance. Michigan allocates LIHEAP to State Emergency Relief, the Home Heating Credit, Weatherization Assistance and Assurance 16 services.

³ Arrearages are an industry term for unpaid energy bills.

designated cap are paid. At the writing of this report, the LIHEAP Direct Support program is targeted for roll-out in late December of 2021.

The MPSC's MEAP and Energy Waste Reduction Staff worked with MDHHS and participating utilities to establish basic reporting for LIHEAP Direct Support to better understand the impact of the program on assisting customers in staying current on their bills. In addition, the data will track customers who transition to the Michigan Energy Assistance Program (MEAP), connection status of customers, and finally what customers receive low-income energy waste reduction services. The data on energy waste reduction services is intended for use as a foundation for future reporting of energy waste reduction services with all energy assistance services.

MEAP Workgroup

During 2021 the Michigan Energy Assistance Program (MEAP) Workgroup continued to meet virtually and is facilitated by ICF. The MEAP Workgroup participants include representatives from the MEAP grantees, the utilities offering MEAP Affordable Payment Plans (APPs), and the State of Michigan (Department of Health and Human Services and the Michigan Public Service Commission). The monthly workgroup meetings provide an opportunity for the MEAP State Team to update the participants on important issues, and for all participants to receive and provide regular feedback on the successes, challenges and funding sources being utilized to assist customers while meeting a common goal of moving households to self-sufficiency and energy security. In addition, MEAP grantees' learning needs have been queried by ICF and a portion of the meetings is dedicated to training.

Initially, when the workgroup met in person prior to the pandemic, only one representative from each group generally spoke for their organization. Rarely was there a call-in method to attend the meeting. The virtual meetings have allowed more individuals involved in all phases of the MEAP process to contribute and learn first-hand during the meetings. The collaborative efforts of all have led to a more effective process, as all parties work together to serve our most vulnerable customers.

Updates from the MEAP Workgroup Subcommittees are included on the monthly workgroup agenda when information needs to be presented to all participants. During Fiscal Year (FY) 2020, three MEAP Workgroup Subcommittees were implemented to address specific vulnerable populations that the existing energy assistance structure did not serve effectively. The subcommittees continued to meet in FY 2021 to complete their proposed plans. Each of the three subcommittees addressed separate issues.

MEAP Subcommittee One: Provision of Deliverable Fuel in Times of Crisis

This subcommittee seeks to better understand MEAP customers using deliverable fuels. The subcommittee developed a Propane Pilot project with the goal of enrolling up to 175 customers. The pilot enrollment was closed after March 2021. A total of 28 households (16% of the goal) enrolled into a propane pilot APP. Subcommittee One identified successes and challenges and is using those points to determine adjustments needed to re-start the propane pilot in FY 2022. The

leading challenges the subcommittee identified were working with multiple energy companies with differing technologies and staffing resources, as well as getting customer buy-in on a new program.

MEAP Subcommittee Two: Supporting Self-Sufficiency and Energy Needs for Vulnerable Populations

This subcommittee seeks to understand how various MEAP clients experience a crisis differently. The subcommittee's initial pilot focused on the group of customers whose income is below 20% of the Federal Poverty Level (FPL).

The pilot program for MEAP customers with an FPL of under 20% allowed selected participants to engage in an APP, who would not have otherwise been eligible. The goal for each client was to work with their coordinators on lowering their energy consumption, engaging in financial and employment coaching, and utilizing referral services. Their monthly payments were subsidized further, and the pilot encouraged regular and on-time monthly payments. The customers had to engage in additional self-sufficiency services to help guide them toward a more sustainable energy burden and to maintain enrollment in the pilot program. The pilot enrollment period was only for FY 2021. MEAP grantees who want to continue offering this pilot included the program in their FY 2022 proposals.

The subcommittee reported several successes and challenges during the administration of the pilot. Four of the nine MEAP grantees volunteered to participate. The households who truly engaged met the goals of the pilot and reported increased credit scores, new housing opportunities, new employment and overall completion of goals leading to increased customer stability. Keeping customers engaged along with the increased time to administer the program were the biggest challenges.

MEAP Subcommittee Three: Monitoring and Evaluation

This subcommittee was created to work toward a common definition of self-sufficiency and develop ways to measure the impact of self-sufficiency services. The subcommittee members adopted the following definition: Self-sufficiency is a household's ability to meet their basic needs while minimizing reliance on public assistance. The definition was used and adopted in other collaborations, including as a starting point of the EAAC Definitions Subcommittee.

The MEAP subcommittee Three had completed their goal by the end of 2020 after completing a logic model outlining the theory of change and proposing an evaluation plan. Early in 2021, it was decided by the State Team that the evaluation plan should be completed by a neutral party and not by the qualified MEAP grantees' staff.

The MEAP Workgroup continues to play a crucial role in education and outreach to vulnerable customers as impacts of the COVID-19 pandemic continue.

State MEAP Team Regular Meetings

During 2021, two meetings a month were scheduled for the State MEAP Team, consisting of the MPSC's MEAP staff and staff from MDHHS who are responsible for federal LIHEAP and MEAP. The bi-weekly format was changed to two monthly meetings, one that focused on State low-income energy matters, and one specifically focused on planning with ICF for the monthly MEAP Workgroup meeting. These regular meetings provided the opportunity to collaborate, and problem solve on MEAP and State Emergency Relief (SER) programs. In addition, the meetings have been essential as other funding options became available and efficiencies were developed to address customers' needs during the pandemic.

State Agency Collaboration:

Staff worked regularly with the Michigan State Housing Development Authority (MSHDA) on the COVID Emergency Rental Assistance Program (CERA) with all utilities. This included facilitating presentations by MSHDA for the Michigan Electric and Gas Association (MEGA), the Michigan Municipal Electric Association (MMEA), and the Michigan Electric Cooperative Association (MECA). Staff also facilitated troubleshooting sessions when utilities faced issues with CERA backlogs or when local agencies raised concerns on program implementation.

In addition, Staff worked with MSHDA on the <u>Michigan Homeowners Assistance Fund (MIHAF</u>) to help program administrators better understand and develop utility assistance payment processes in this new program designed to help home owners keep their homes. While this program has not yet been implemented, Staff will continue to work with MSHDA and the utilities to problem solve as issues arise. Staff also provided the MIHAF program manager with resources on energy assistance programs in Michigan for the customer service representatives assisting homeowners with the program.

Coalition to Keep Michigan Warm

Staff participates in the monthly meetings of the <u>Coalition to Keep Michigan Warm</u>, a group of energy service providers, governmental bodies, nonprofit energy assistance providers and energy waste reduction companies. These monthly meetings provide staff with the opportunity to update stakeholders on current energy assistance and the implementation of the energy waste reduction program, as well as solicit input on customer and agency concerns.

Ad-Hoc Energy Policy Group monthly meetings

After the order was issued on February 18, 2021 in Case No. U-20757, staff met regularly with a representatives from organizations such as Citizens Utility Board, Michigan Environmental Council, Sierra Club, the National Housing Trust, the National Resources Defense Council, Elevate, EcoWorks, and Soulardarity. This group was instrumental in providing guidance on the structure of the Energy Affordability and Accessibility Collaborative (EAAC) as well as expectations and goals. This on-going meeting provides an opportunity for informal discussion on energy affordability issues needing immediate attention and longer-term energy affordability reform.

National Association of Regulatory Utility Commissioners (NARUC)

Customer Assistance Division Staff participate monthly in the <u>NARUC Staff Subcommittee on the</u> <u>Consumer and the Public Interest</u>. The subcommittee provides an arena for an exchange of ideas and best practices on customer protection, energy assistance programming, regulatory approaches to assisting customers, and outreach and communication.

National Energy and Utility Affordability Coalition (NEUAC)

Staff was appointed to the advisory board of NEAUC in 2021. NEUAC is a broad-based coalition of diverse member organizations and individuals dedicated to heightening awareness of the energy needs of low-income energy consumers, fostering public-private partnerships and engaging in other activities to help address these needs. Participating on this board provides access to up-to-date information on energy assistance and best practices in addressing customer needs. In addition, NEUAC connected Staff to national and state experts in LIHEAP and energy assistance and regulatory approaches to customer service who presented at the EAAC.

Section 2: Shutoff and Arrearage Data

Commission Charge

The Commission adopted the Staff's recommendation in the U-20757 Collaborations and Communications Process report for ongoing utility customer data collection; and, for the time being, directed IOUs to continue to file monthly reports in the U-20757 docket using the updated Staff template detailing the data on disconnected service to occupied and unoccupied residences and arrearages⁴. While the information in these reports is available to the public via the Commission's E-dockets system, the Commission adopted the Staff's recommendation to make this data publicly available in a protected, more easily analyzable form.⁵

Public Access

Process and History

Out of concern for customer safety as the COVID-19 pandemic unfolded, the MPSC issued an order on April 15, 2020 in Case No. U-20757 that regulated utilities to file bi-weekly the following information:

- Efforts made to determine the number of occupied residencies in the utility's service territory without natural gas or electric service.
- Number of occupied residences within the utility's service territory that do not have natural gas or electric service due to non-payment.

⁴ Link to <u>Utility Customer Data</u> page on the MPSC website.

⁵ Case No. U-20757, 02/18/2021, pages 16,17

- Number of occupied residences that do not have natural gas or electric service due to unauthorized use, safety, access, or other issues.
- Actions taken to reconnect natural gas or electric services to occupied residences, particularly to low-income and elderly customers.

Staff developed a reporting form template to operationalize the above criteria and to ensure that utilities filed the data correctly and uniformly. On May 20, 2020, Staff submitted a revised reporting form to the docket to include arrearage data reported by number of customers and total dollar amounts. This data was also required to be broken down by low-income/senior customers and non-low-income customers.

On July 23, 2020, in Case No. U-20757 the Commission called on its staff, regulated utilities, and stakeholders to continue customer outreach, data collection, and program enhancements to provide adequate safeguards for the uncertain future of the on-going pandemic. Staff worked with the utilities and stakeholders to build consensus on the necessary data elements needed to provide an understanding of customer trends in shutoffs and arrearages (unpaid bill balances). During this process a new data collection form was created, and the reporting cadence changed from bi-weekly to monthly starting October 10, 2020, with September 2020 as the first full month of data collected. The refined and ongoing data submission allowed for policy changes as needed to increase customer safety.

Staff also created a public webpage for this monthly shutoff and arrearage data allowing the data to be viewed and analyzed in an easier format. On June 30, 2021, the data page went live. Regulated utilities continue to report their data monthly on the 10th of every month via the docket as well as to a protected shared drive that allows the data to populate on the <u>public data page</u>.

Public Education

To inform customers of the new public data page, the MPSC issued a press release on June 30, 2021⁶. Staff also completed a video that was placed on the data page that provides a tutorial on how to use the site. In addition, Staff presented the data site as part this Collaborative, and gave a site presentation during the MI Power Grid Customer Education and Participation stakeholder meeting on August 4, 2021. On August 26, 2021, Staff again presented the website during the Kent Essential Needs Task Force Energy Efficiency Committee.

Current Status

Data continues to be reported monthly. Staff and the public can review the data as a whole or break it down by specific utility, including visualizing monthly trends. The data provides insight into how many customers remain shut-off at the end of the month, how far in arrears customers of each utility are, how many customers have had their service restored during the month, and

⁶ Link to Press Release

how many customers are on payment arrangements as outlined by the <u>MPSC Billing Rules</u>. This data is broken down even further to identify the shutoff and arrearage trends of the most vulnerable customers through a low-income/senior citizens category and then non-low-income customers. Staff continues to brief the Commissioners and Senior Staff bi-weekly on trends or concerns identified in the data.

Section 3: Energy Waste Reduction Low-Income Workgroup

Because the <u>Energy Waste Reduction Low-Income Workgroup</u> (EWR Low-Income Workgroup or Workgroup) was so intimately connected to the creation and ongoing work of the EAAC, Staff is providing a general update of the group's activities in this report.

The EWR Low-Income Workgroup is now approaching its 4-year anniversary and continues to grow in numbers and expand its area of influence. Projects that were halted at the onset of the COVID pandemic were quickly revived and continue to move forward and expand for 2022. Likewise, new projects have been kicked off with Michigan 211 and Workforce Development, and ongoing projects continue to be refined. The EWR Low-Income Workgroup met eight time in 2021 and covered a variety of topics that demonstrated the intersectionality of energy waste reduction (EWR), housing, weatherization, health, equity, and environmental justice.

In January the meeting discussion was primarily about equity in energy services and the resultant impacts on vulnerable and marginalized populations. The March meeting centered around the on-going projects in the city of Grand Rapids related to climate change and carbon reduction. EGLE spoke about the role of clean water, and the group received further information regarding the pending kickoff of the Energy Affordability and Accessibility Collaborative. At the meeting in May, the group thoroughly reviewed a briefing on the 2021 ALICE Report that had just been released as well as a report from Superior Watersheds on their weatherization and solar projects.

The Workgroup met again in June and the meeting was dedicated to funding and financing projects with Holland Board of Power and Water, Traverse City Light and Power, Walker-Miller Energy Services and Michigan Saves reporting on their respective projects.

In September the meeting agenda included a report on the pending financing and service delivery issues with the Weatherization Assistance Program (WAP); a report on the new office of Policy and Planning at MDHHS and the incorporating of the Social Determinants of Health; and a report from the University of Michigan on a new grant project about the health benefits of weatherization.

The meeting in October focused on Michigan State University's grant regarding the development of an industrial assessment center and its incorporation of workforce development and inclusion of vulnerable and marginalized communities. The new 211 project was introduced to the Workgroup stakeholders and a discussion took place about the activities planned for the weatherization day at the Michigan State Capitol. Participants also revisited the WAP's spending and budgeting issues. There were two meetings held in November. At the first meeting, Housing North was introduced to the Workgroup. Also, participants reviewed a report from the Council on Climate Solutions Building and Housing Workgroup, and the Kent County Essential Needs Taskforce provided a demonstration of their services matrix. Because of the amount of discussion generated by the lack of stakeholder understanding related to the funding and capacity issues of the Weatherization Assistance Program, as discussed in the two preceding meetings, the second November meeting was dedicated to this topic exclusively and was led by Michigan Community Action. The discussion centered around the differences between DOE and Michigan's funding for the WAP, the role of the utilities, and how that funding leads to personnel and material capacity shortfall.

Section 4: Energy Affordability and Accessibility Collaborative

Introduction

The following section provides an overview of the establishment and progress of the EAAC, including thoughts from Staff on the future collaboration between the EAAC and the EWR Low-Income Workgroup.

Staff endeavored to create an environment where broad and varied input was made possible to provide guidance to the Commission in making formal policy decisions on energy affordability and accessibility. During the initial stages of the EAAC's development, Staff remained committed to achieving consensus when possible.

Staff acknowledges that while the EAAC provided enhanced collaboration across the government, advocacy, human services and utility sectors, representation from high burden, historically marginalized communities was missing. In addition, the group lacked racial and ethnic diversity. As discussed below, a primary goal of the EAAC from the outset and continuing into 2022 is to build trusted relationships in these communities in order to allow for individuals and organizations representing high energy burden and racially diverse communities to provide meaningful input to policy discussions.

Stakeholders identified several challenges facing the ongoing work of the EAAC. Tension exists between advancing policies that can improve the efficiency and effectiveness of the energy assistance and customer protections system and have the imperative of bringing representatives of high energy burden, historically marginalized communities into the policy development process. This critical objective takes time because it necessitates building trust from within communities through relationship building. This tension is woven through many of the identified challenges identified below.

Determining Relationship With EWR-Low Income Workgroup

When directing Staff to form the Energy Affordability and Accessibility Collaborative (EAAC), the Commission was concerned with overtaxing the time and resources of participants by the addition of a new collaborative on top of the EWR Low-Income Workgroup. To address this concern, the

Commission asked Staff to explore with the EWR Low-Income Workgroup how best to coordinate with the EAAC. The Commission further directed the Staff and the EWR Low-Income Workgroup to explore the option of including the EAAC within the EWR Low-Income Workgroup."⁷

From the onset the Customer Assistance Division worked closely with the Energy Waste Reduction section at the Commission to establish a process for the creation and implementation of the EAAC with the goal of close collaboration with the EWR Low-Income Workgroup and to facilitate input from the members of the EWR Low-Income Workgroup on a proposed structure for integrating low-income energy assistance policy with low-income EWR policy discussions.

Survey results⁸

Staff began this process with a survey of all current participants of the EWR Low-Income Workgroup mailing list and the EAAC/EWR Low-Income Workgroup listserv for perspectives on the interaction between the two groups as well as the future of the EWR Low-Income Workgroup in respect to broader low-income energy policy. The survey results suggest that 74% of participants preferred to have one collaborative that addresses low-income energy policy, with 46% of recipients (included in the 74%) preferring one collaborative with various subcommittees assigned to key issues. However, when asked about their opinion related to energy waste reduction being addressed adequately in one collaborative, members had concerns that energy waste reduction would be lost in the greater policy discussions.

Staff determined from this stakeholder input to begin the first year of the EAAC as a separate collaborative with close ties to the EWR Low-Income Workgroup and joint planning. Staff has reevaluated this process which is discussed in more detail below.

EAAC Webpage

Staff created a <u>webpage for the EAAC</u> to provide an overview of the EAAC effort. The page includes information for upcoming meetings (with agendas and a link to the event), and information for past meetings (with agenda, presentations, chat history and meeting recording). The site also includes a link to the <u>EWR Low-Income Workgroup</u> and an option to sign-up for the Energy Affordability and Accessibility Collaborative / Energy Waste Reduction Low Income Workgroup Mailing List.

Several months into the EAAC process, Staff created a <u>Documents and Resources Page</u> to provide a library of references, resources, presentations, and studies. This page also houses documents for the Affordability, Alignment and Assistance Subcommittee.

⁷ U-20757, 02/18/2021, page 15

⁸ Refer to Appendix E for the survey questions and results.

EAAC Structure

The structure of the EAAC and its relationship with the EWR-LI workgroup was determined by the priorities chosen by stakeholders within the parameters set by the Commission in Case No. U-20757, recapped here and reviewed at every EAAC meeting:

- Continue ongoing COVID-19 response.
- Recommend approaches for simplifying the energy assistance and customer protection systems, working with the EWR low-income workgroup.
- Explore a common definition of energy affordability and energy security with the goal of reducing the number of households in Michigan with unsustainable energy burdens.
- Emphasize the importance of data collection, transparency, and analysis to inform program design and policy changes.
- Review rule-based protections.

The top priorities chosen through a stakeholder survey were:

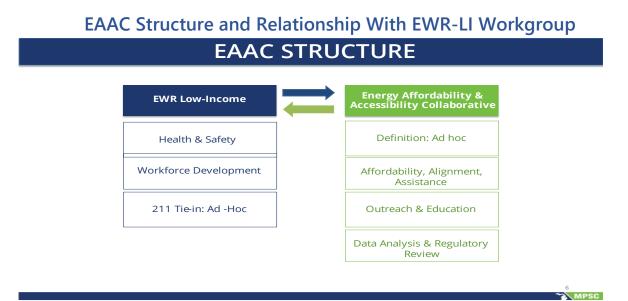
- Study the alignment of income eligibility across energy assistance programs and customer protections, including the impacts of expanding eligibility to 200% of the FPL; and under Commission jurisdiction, making recommendations on aligning application processes, if beneficial.
- 2. Analyze the application, eligibility determination, and program design for the various assistance programs and utility-based credits, additionally making recommendations for alignment and simplification.
- 3. Adopt a common definition of energy affordability and energy self-sufficiency.
- 4. Direct utilities to pilot the targeting of communications so that recipients of an energy assistance program will be alerted to eligibility for energy efficiency programs.⁹

To break the priorities into manageable work segments, Staff proposed a subcommittees structure that would be comprised of MPSC Staff and Stakeholder leadership. Leadership was carefully considered to balance diverse Staff and stakeholder (advocacy and agency) expertise. Leaders include Staff from the MPSC Michigan Energy Assistance Programs (MEAP), Communications and Rates and Tariffs Sections, and the Customer Assistance Division. Stakeholder leadership was drawn from 5 Lakes Energy, the Citizens Utility Board, EcoWorks, Elevate, the Salvation Army and the Society of St. Vincent de Paul. The primary work of analyzing, collecting data and information, seeking stakeholder input, and proposing solutions was placed with the subcommittees. This allowed the monthly EAAC meetings to concentrate on building a foundation of knowledge of the current state of energy assistance, customer protections and regulatory environment, as well

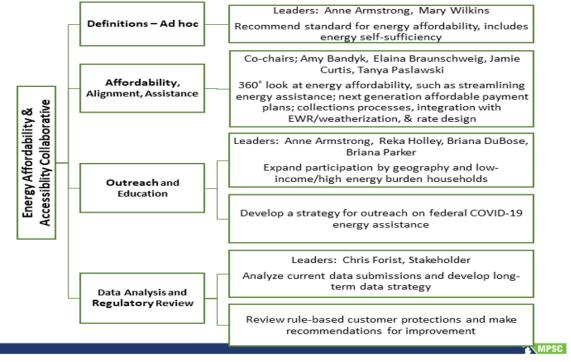
⁹ Refer to Appendix E for the survey questions and results.

as bringing in state and national experts to provide insight into research, other state experiences and best practices.

Four subcommittees were identified: 1) Definitions Ad Hoc; 2) Affordability, Alignment and Assistance, 3) Outreach and Education; and 4) Data Analysis and Regulatory Review. Once leadership was identified, each subcommittee determined its own process and meeting schedule.



EAAC Subcommittees Leadership and Charge



Meetings

The EAAC met monthly from April through November 2021 with the subcommittee work starting in August. Staff developed <u>agendas</u>¹⁰ with input from the EAAC internal planning team including members from the MPSC's Rates and Tariffs Section, the MEAP Section and the Energy Waste Reduction Section. In addition, Staff informally shared several agendas with the Ad-Hoc Energy Policy Group and the leadership of the Outreach and Education Subcommittee for stakeholder input to ensure Commission and stakeholder goals were being met.

Guiding Values

One ongoing practice of the EAAC, initiated and run by stakeholders, is a segment at each meeting devoted to uplifting consensus guiding values with the intent of building a safe and transparent environment. Briana Parker of Elevate suggested this practice and recruited a small team of volunteers to develop a process to build consensus on guiding values and to highlight one guiding value to the EAAC each month. The consensus guiding values are: 1) Advance Racial & Economic Justice, 2) Enhance Environmental Justice, 3) Active Listening & Communication, 4) Operate with Integrity, 5) Ensure Inclusion, 6) Practice Accountability, 7) Encourage Collaboration, 8) Let Impacted Communities Lead, 9) Education & Awareness, and 10) Promote Transparency.

For the coming year, the Outreach and Education Subcommittee leadership proposed more EAAC member engagement with the guiding values with the objective of bringing the values into the core of the EAAC process. At the November meeting, volunteers for Guiding Values Ambassadors were sought. Beginning in 2022 an ambassador will bring a guiding value to each EAAC meeting for education, discussion, and practice.

Community Concerns

At the July 21 meeting, the Michigan Welfare Rights Organization brought an urgent concern to the EAAC concerning a customer who was facing imminent shutoff due to nonpayment of their utility bill. The meeting focused on energy assistance in Michigan and consequently state experts were present to address the organization's concerns. In response, Staff, along with the leadership of the Outreach and Education Committee, instituted a segment in monthly EAAC meetings for community members to bring forth community concerns that Staff and others could seek to redress or to better understand to determine if policy changes could resolve the issue.

Summary of Meetings¹¹

The April 8, kick-off meeting of the EAAC focused on setting the stage and reviewing the charge given to the group from the Commission. A survey had been distributed via email to interested

¹⁰ Refer to the <u>EAAC website</u> for the meeting agendas.

¹¹ Refer to Appendix C for a list of presenters and moderators. <u>Bios</u> of the presenters can be found on the <u>EAAC website</u>.

participants ahead of the kick-off meeting, and Staff provided an overview of the survey results on the EAAC structure. In addition, the Guiding Values consensus process was initiated. In response to the Commission charge to engage in an on-going COVID-19 response, there was a discussion on federal utility assistance outreach. There was also a beginning discussion of stakeholder priorities within the Commission charge. To provide a foundation for the discussion of energy affordability, Roger Colton of Fisher, Sheehan & Colton addressed the Collaborative on Different Approaches to Energy Affordability.¹²

Subsequent meetings focused on providing an educational foundation on energy assistance and customer protections. The process began with an Overview of Commission Authority to place policy development in a regulatory environment in context. Staff endeavored to mix pure informational sessions, such as a presentation on the MPSC Public Utility Arrearage and Shutoff Data site and a presentation on the definition of Energy Self Sufficiency with moderated panels of experts. Panels were developed to address priorities chosen by stakeholders, while continuing to build foundational knowledge.

Panels

Panel 1: Energy Affordability Standards - Barriers to customers sustainably paying their bills. *Panelists*: Roger Colton of Fisher, Sheehan & Colton; Amy Gendusa-English of National Community Action Partnership (national); Monica Martinez of Coalition to Keep Michigan Warm (state); Bethany Stutzman of United Way Jackson County; Shama Mounzer of Wayne Metropolitan Community Action Agency (regional).

Panel 2: National Discussion of How States Approach Affordability

Panelists: David Carroll of Apprise, Katrina Metzler of National Energy and Utility Affordability Coalition.

Panel 3: Regulatory Approaches to Affordability

Panelists: Joe Magee of Pennsylvania PUC; and Gabe Dusenbury of Colorado PUC. Consumption-Based Rate Approach from Kurt Cooper of Indiana Michigan Power.

Commissioner Tremaine Phillips addressed the Collaborative in August to provide a broad overview of the Commission's work related to energy affordability and accessibility.

In September and October, the EAAC looked at the Customer Journey a topic brought to the group from the Affordability, Alignment, and Assistance Committee. The first stage included an in-depth discussion of energy assistance programs in Michigan, including the COVID Emergency Rental Assistance Program (CERA) program which covers utility assistance. Time was allotted for question and answer between participants and presenters. This session coincided with a new

¹² Refer to the <u>EAAC Documents and Resources</u> page

fiscal year, allowing state program experts to talk about existing programs such as MEAP and State Emergency Relief (SER), as well as new federal Low-Income Home Energy Assistance Program (LIHEAP) and CERA funds allocated through the American Rescue Plan Act. In partnership with the Michigan Department of Health and Human Services (MDHHS), Luke Shaefer, special counselor on anti-poverty policy to the MDHHS Director and Associate Dean of the University of Michigan Ford School of Policy, was featured to lead a visioning exercise on moving from crisis response to prevention. The October meeting continued the focus on the customer journey with presentations by five utilities: Consumers Energy, DTE, SEMCO, UPPCO and Indiana Michigan Power. This was followed by a discussion of the Customer Journey on assistance through human service agencies 211, MIBridges, the state of Michigan low-income and crisis benefits portal, and by phone or in-person. Expertise for this session was provided by three MEAP Grantees: Angela Sterner of The Salvation Army; Nicole Fanjoy of True North; and Sean Scane of United Way Southeast Michigan.

Because Staff has provided background on the energy assistance system in Michigan in previous reports in the U-20757 docket, more detailed information on these processes and programs are available at the <u>EAAC Documents and Resources page</u>. Other resources in Appendix F include:

- A timeline for federal energy assistance related to COVID-19.¹³
- A high-level overview of energy assistance programs in Michigan.¹⁴
- A diagram of the interrelationships between energy assistance programs¹⁵ (including utility-based credits)

The final and perhaps most important segment of the Customer Journey¹⁶, customer perspectives, will be presented to the Collaborative in early 2022 under the direction of the Outreach and Education Subcommittee.

The November meeting was devoted to updates from the Ad-Hoc Definitions Subcommittee, the Affordability, Alliance and Assistance Subcommittee and the Outreach and Education Subcommittee on progress to date, including an overview of each committee's contribution to the interim report.

A participant suggested there could be value in adding a session to address the process, successes, and challenges associated with how energy assistance specifically interacts with energy waste reduction and weatherization services. This session could address these ties from the utility,

¹³ Energy Assistance Timeline 7.22.21 (michigan.gov)

¹⁴ Federal and State Energy Assistance Programs Summary 11-12-21 743477 7.pdf (michigan.gov)

¹⁵ FY20 Assistance Programs and Credits diagram 09032021 (michigan.gov)

¹⁶ <u>Utility and Agency Customer Journey Presentation:</u> Excerpts from the presentations by the MPSC,

MDHHS, MSHDA, and the utilities and agencies on programs and the customer journey.

agency and customer perspectives and could assist in the development of meaningful recommendations on tying energy assistance to energy waste reduction services.

Subcommittees

Below are reports from each subcommittee that provide information on leadership, structure, goals, accomplishments, challenges, and recommendations if any. Each subcommittee drafted its own report and solicited feedback from stakeholders to ensure ongoing input and dialogue with stakeholders.

A summary of recommendations and next steps will be provided at the end of the subcommittee summaries.

Definitions – Ad Hoc Subcommittee

Charge from the Commission

The charge from the Commission that is being addressed by the Definitions Subcommittee is threefold:

- 1. Define, establish a common definition of energy security/self-sufficiency. Begin with the proposed definition by MEAP Workgroup Subcommittee Two: "A household's basic needs for home energy are being met while minimizing reliance on public assistance."
- 2. Develop a proposal for an energy affordability standard and how the standard can be integrated into the regulatory environment.
- 3. Draft suggested requirements for consistent energy affordability-related information for utilities to submit to appropriate dockets: rate cases, IRPs, EWR cases.

Leadership

The Definitions Subcommittee is co-chaired by Anne Armstrong, Director of the Customer Assistance Division at the MPSC; and Mary Wilkins, Program Consultant for The Salvation Army with 30 years' experience servicing the needs of low-income households

Membership

The subcommittee members¹⁷ include a diverse cross-section of stakeholders, including MPSC staff members, energy assistance agencies, income-eligible customer advocates, and utilities.

Meetings

The Definitions Subcommittee adopted an intensive biweekly meeting schedule beginning on August 26, 2021, with the goal of reaching consensus on a definition of affordability to recommend to the Commission for the 12/17/2021 interim report. Subcommittee leadership met as needed and corresponded regularly through email and Microsoft Teams.

¹⁷ Refer to Appendix D for a list of subcommittee members.

Goals

A goal of the co-chairs was to develop a definition that would serve as an underpinning to an energy affordability standard and subsequent data collection. In accordance with the Commission's charge, the group began working on a definition by utilizing the definition of self-sufficiency from the MEAP Workgroup: "A household's basic needs for home energy are being met while minimizing reliance on public assistance." This definition was compared with and modified by concepts found in other organizations' definitions of energy security that were explored by the subcommittee.

The stated intention was to "discuss, hear each other, and work toward consensus" among this small group of diverse stakeholders. Meetings were introduced by recounting ground rules and etiquette. Group members politely responded and challenged ideas utilizing the raised hand and chat functions inherent in the Teams platform. Additionally, on-line surveys included within or following the meetings allowed group members to provide anonymous feedback. As time allowed, feedback was then incorporated into the next meeting's agenda.

Progress

At the first meeting, the subcommittee started working with the MEAP Workgroup's definition of self-sufficiency. After some discussion, one participant noted that self-sufficiency cannot necessarily be obtained without affordability. There was also strong objection by others to including "minimizing reliance on public assistance" in this definition. Some members advocated that it is not realistic to assume that all customers can achieve self-sufficiency, particularly if a disability is involved, and regardless, energy needs to be affordable to those customers. Participants were reminded in each of the first five meetings to keep in mind two questions when evaluating our work on a definition: 1) Will this definition, as refined, help us to develop an energy affordability standard and measure success? 2) Does this definition point us to data that will be useful to consistently collect in rate cases?

The group proceeded to discuss pursuing a definition of energy security, security which has connotations of uninterrupted supply and continuous availability, and ultimately determined that it was a definition of Energy Affordability we were trying to achieve. The subcommittee then chose to further qualify energy as home energy.

In the subsequent two meetings the group debated concepts found in a sampling of seven different definitions of energy security that are in use by other entities and their applicability to a definition of energy affordability.¹⁸ In vetting elements inherent in these definitions of energy security, the subcommittee discussed and ruled out fuel types as well as non-energy fuel types for inclusion in the definition. They discussed how to qualify basic needs, the importance of

¹⁸ Refer to Appendix B for a list of energy security definition sources for these concepts.

improving energy efficiency in these homes, and the concept of reasonable temperature. Consistency or lack of interruption of energy supply and sufficient quantities of energy were also considered.

Next the subcommittee evaluated additional concepts related to affordability for incorporation into the definition. These included: consent or agreement to cost, reasonable pricing, payment predictability, ability to pay today or over time, the ability to pay without use of savings or credit, and the ability to pay on-time. Due to a diversity of opinions, consensus was not achieved regarding inclusion of these elements in the definition and the concept of affordability was revisited from a different vantage point.

At the fifth meeting, the subcommittee undertook a more in-depth examination and reviewed alternative metrics and dimensions such as energy insecurity with a meaning of vulnerability to disconnection; energy poverty which focuses on access to modern fuels energy access – a household having reliable and sustainable access to modern fuels; as well as energy burden – the percentage of household income spent on energy costs.¹⁹ They discussed energy burden and its drivers and reviewed a diagram of Energy Affordability and Service Planning Costs and discussed the household relationship to affordability in the affordability equation.

The subcommittee evaluated definitions from industry experts and asked themselves the question, "What costs are being considered in affordability? Financial costs? Human costs? Environmental costs?" Challenges in the affordability of the grid of the future were also given some consideration. At this point, as the committee explored the idea of 'having a cost that is not too high' in the definition of energy affordability, some members expressed concern about how the definition could impact dockets and a preference for leaving this out of the definition. Others advocated for a balanced approach that does not place the burden of affordability on the household alone.

In the last meeting prior to the filing of this report, the subcommittee reviewed suggested language for the definition of energy affordability from surveys to which they had responded, and they offered additional language suggestions. They discussed methods of consensus building and decision making as well as options for stakeholder input into the definition. Following the meeting, participants responded to a survey offering a choice between seven different versions of definitions that were proposed. Eleven responses from nine respondents narrowed the definitions to five.

¹⁹ High energy burden and low-income energy affordability: conclusions from a literature review. Marilyn A Brown *et al* 2020 *Prog. Energy* **2** 042003 <u>https://iopscience.iop.org/article/10.1088/2516-1083/abb954</u>

In an attempt to gain further understanding of respondents' choices, a follow-up survey was circulated which broke out the concepts inherent in the proposed definitions. Below is a representation of the survey to allow readers an opportunity to consider the complexity and nuances attendant to reaching a consensus definition. The options presented as potential answers in this survey represent language choices discussed in subcommittee meetings that were previously incorporated into the five definitions preferred by subcommittee survey respondents.

Proposed Definition Survey

- 1. How would you qualify energy as "able to be afforded?" (Choose only one)
 - a. A household has the resources to meet their home energy needs...
 - b. A household's home energy needs are being met...
- 2. In defining energy affordability, would you qualify home energy uses as "for heating, cooling, and other uses?" Yes or No
- 3. In addressing the manner in which energy is used, which phrasing do you prefer? (Choose only one)
 - a. ...in an energy efficient way...
 - b. ...while promoting energy efficiency...
 - c. ...in an energy efficient manner...
 - d. None of the above; I would leave this concept out of the definition.
- 4. In defining energy affordability, how would you qualify "having a cost that is not too high?" (Choose only one)
 - a. ...with cost efficient energy pricing...
 - b. ...without compromising the household's ability to meet other basic needs...
 - c. Neither A nor B; I would leave this concept out of the definition.
- 5. What is your preference for phrasing that qualifies the manner in which energy affordability is achieved? (Choose only one)
 - a. ...that promotes health and well-being...
 - b. ...in a healthy way...
 - c. ...in a healthy and sustainable manner
 - d. None of the above; I would leave this concept out of the definition.

This survey demonstrates the challenge of reaching consensus and was not conclusive. Because the Definitions Subcommittee includes only fifteen members, the group decided it was prudent to take options for the energy affordability definition to stakeholders outside of subcommittee members. The group also decided that it would be critical to listen to customers on what energy affordability means to them, as well as ask their views on the approaches to energy affordability provided by the subcommittee. The subcommittee is working with the Outreach and Education Subcommittee to incorporate this discussion into their five proposed townhalls for early next year. In addition, the Definitions Subcommittee is working with the MI Power Grid Customer Outreach and Education group to incorporate the energy affordability discussion into upcoming listening sessions. After these dialogues with customers throughout the state, the Definitions Subcommittee will bring the distilled information back to the full EAAC for review. During subcommittee meetings, group members demonstrated an atmosphere of collegiality and respect. Many of the group members consistently participated in dialogue either verbally of through the chat and offered their points of view. As one member put it, "The meeting schedule was well-structured, keeping us focused on specific elements in the right order. I felt subcommittee members had ample opportunities to submit their perspectives and opinions through discussion, the chat function, and surveys."

Meetings were well-attended, and surveys were responded to with occasional reminders. One member felt that "The surveys were an effective method to gain feedback from various stakeholders, especially as the leadership team gained experience in their use." Others enjoyed the opportunity for feedback and the experience of feeling heard: "I think that the meetings were all very well run, thought out and a good use of time. Everyone has so many meetings on their books now and having one that gives a sense of accomplishment is always welcome!"

Challenges

During the first meeting, the subcommittee concluded that the goal was to seek a definition of energy affordability rather than self-sufficiency or energy security. Once this was established, the group experienced a temptation to quickly default to "energy burden" as a standard rather than provide a definition. There was some opposition to the use of energy burden in an attempt to avoid a "one size fits all" approach to energy affordability, so agendas were structured to engage a breadth of topics rather than draw conclusions quickly.

As the group delved into concepts related to self-sufficiency, there was good dialogue and productive work toward consensus. However, as they began to discuss concepts related to energy security, the group began to struggle more with coming to consensus, and when exploring concepts related to affordability, differences in perspective became more apparent. One member felt that some personalities were larger than others and were focused on their own agendas. The views of the whole group were not necessarily represented. It was a challenge to create a safe space where trust was established, and everyone felt safe talking. Anonymous surveys and an invitation to email co-chairs were intended to mediate this factor. However, there may have been members who still felt less free to share their opinions. While some members greatly appreciated the dialogue and guided discussion, others felt there may have been too much process and wordsmithing.

Representation from low-income households and people that have a disability on the subcommittee was recommended by some members and may have been helpful. Alternately adding more participants in a Teams format where participants do not have established relationships could have intensified an environment where more people felt less safe expressing their opinions due to possible power differentials, concern about creating conflict or offending others.

When questioned about areas where the group dissented or did not see eye to eye, responses varied from. "Nothing major, how detailed, and what details to include in the definition," to, "I

think it is just difficult for everyone to see eye to eye with such a diverse group of stakeholders. There are so many interests to balance."

The greatest area of dissent in the group was stated this way by a member, "Where does responsibility for making energy "affordable" lie- on the consumer through personal choices? The utility provider through their business model, pricing decisions, etc.? A combination of both?"

Some members struggled with the scope of the discussion and felt discussions about affordability should be limited to the realm of the ratemaking process. One member stated, "I think that it is too crowded with other issues such as food, etc. and the focus should be on energy." Others advocated that the onus for affordability should not fall squarely on households and that the price of energy was an important factor in the equation. In balancing the price and the household in the energy affordability equation, members vied to tip the scale to one side or the other.

Recommendations

Because of the complexity and nuance of the concepts comprising energy affordability and the diversity of stakeholders, the subcommittee did not reach a final consensus and continues to work toward a recommendation. Therefore, the Definitions Subcommittee does not have any formal recommendations at this time. The next steps for the subcommittee include:

- Obtain stakeholder input by working with the Outreach and Education Subcommittee to consider implementing suggestions made by the Definitions Subcommittee:
 - In small focus groups, utilize targeted, specific questions such as completing the sentence, "Energy is affordable if..." and allowing constituents to help flesh out the concepts involved in a definition of energy affordability such as, health, costs, efficiency, etc.
 - Surveying energy assistance applicants at intake, surveying assistance intake staff, and surveying a broader group once definitions have been narrowed to two or three.
 - Obtaining input from the EAAC members following community group input.
- Provide the Commission with a recommended energy affordability definition if consensus is reached or with options for an energy affordability definition if consensus is not reached.
- Begin the process of establishing a recommendation for an energy standard.
- Work with the Data and Regulatory Subcommittee and in consultation with the Commission's Diversity, Equity and Inclusion Team to build recommended data requirements for utilities to demonstrate energy affordability in appropriate dockets.

Affordability, Alignment and Assistance Subcommittee

Charge from the Commission

The charge of the Affordability, Alignment and Assistance Subcommittee (AAA) is to look at all aspects of energy affordability including streamlining and making more accessible existing energy

assistance programs, researching next generation affordable payment plans, analyzing collections processes, integration with EWR and weatherization, and rate design.²⁰

Leadership

The initial subcommittee co-leads were Jamie Curtis (MPSC), Elaina Braunschweig (MPSC), Amy Bandyk (Citizens Utility Board of Michigan) and Tanya Paslawski (5 Lakes Energy). Tanya Paslawski stepped down from her role in October 2021. Kristin Bolds, Director of Community Assistance for the Society of St. Vincent de Paul is functioning as an acting co-leader at this time. Subcommittee leaders serve in a voluntary capacity outside of their normal roles and responsibilities.

Membership²¹

During the full meeting of the Energy Affordability and Accessibility Collaborative (EAAC) on June 16, 2021, MPSC Staff outlined the subcommittee structure and shared a link for attendees to sign up to participate in subcommittees of interest. Staff sent follow up emails to the EAAC listserv to give interested parties multiple opportunities to join subcommittees. There are currently 57 AAA Subcommittee members subscribed to the listserv and members consist of human service agencies, advocacy groups, MPSC Staff and utility representatives. Leadership has discussed the need for additional outreach to other government agencies, including DHHS, since much of what is being discussed crosses agencies. Leadership also acknowledges the importance of staying connected to the work being done in the Community Outreach and Engagement Subcommittee and making sure that new stakeholders that are joining throughout the process will have the opportunity to join in the work of the AAA. Subcommittee members are notified of the meeting topic in advance of each meeting.

Meeting Cadence

The subcommittee leadership team began meeting on July 1, 2021 and continued to meet every other week. The first full subcommittee meeting was held on August 12, 2021, from 1:00 - 2:00 p.m. EST and continued to meet on the second Thursday of every month at 1:00 p.m. EST.

Meeting Structure and Organization Methods

The subcommittee holds meetings virtually via Microsoft Teams. At each meeting, the subcommittee leadership outlines goals for the meeting and identifies upcoming deadlines. Leadership invites issue experts to present on a topic that subcommittee members help to identify in advance. Subcommittee members are encouraged to ask questions and engage in dialogue with the presenters and each other to help identify additional questions, areas for research and ideas for improvement. During the meeting, leadership updates the PowerPoint presentation with

²⁰ Order issued on February 18, 2021, in Case No. U-20757, p. 17.

²¹ Refer to Appendix D for a list of subcommittee members.

notes. After each meeting, leadership shares the presentations and meeting notes with subcommittee members for reference so that those who were unable to attend the meeting can stay current with the subject matter and timeline. Pertinent information is uploaded to the EAAC website. Subcommittee leaders keep a list of goals and update it with feedback from the meetings and from comments submitted by participants between meetings. There are areas for improvement including uploading more resources on the website and sending out an agenda more reliably.

Collecting Feedback and Soliciting Input

The subcommittee used the Momentive platform (research.net) to solicit input on topics, speakers, and the direction of the subcommittee. The initial feedback survey solicited 34 responses and the subcommittee leadership used this information to generate a guiding statement as well as develop a plan for moving the subcommittee forward. Affordability was the primary interest for participants, followed by eligibility and accessibility. Participants ranked eligibility processes as the highest priority, followed closely by ensuring equitable access and improving program coordination. The majority of the survey participants indicated they had confidence that the AAA subcommittee would be able to achieve the goals set out. Some provided feedback that in order to be achieved, goals must be focused and SMART (specific, measurable, actionable, relevant, and time-bound). Still others were concerned that the subcommittee's goals were ambitious, there were too many competing groups and interests, and the issues were multi-faceted and amorphous.

The leadership team created an anonymous suggestion box to have an outlet for any ongoing feedback. One response has been received to date, which recommended increasing the priority and funding for energy efficiency and weatherization to be closely linked to energy bill assistance efforts as well as ensuring that climate-related goals to reduce carbon emissions are connected to their efforts as instructed by Governor Whitmer's policy directives.

Goals

The plan for approaching the potential goals identified by the subcommittee follows a simple structure. First, the subcommittee will choose a goal by soliciting input on changes members would like to see in said program or goal using the guiding question/subcommittee charge parameters. Once the goal is chosen, the group will set about researching the goal. This step involves having the organization who runs the specific program that is being addressed (utilities, MPSC staff, DHHS staff, other stakeholders) present to provide background knowledge and to help the group understand any limitations of that program or potential solutions.

Next, the group will identify possible solutions to meet the selected goal. Once the solutions are identified and formulated, the subcommittee leadership will bring the solution to the broader

EAAC group for review. The final steps involve collaboration/coordination with the responsible organization(s) and ultimately proposing the solution to the Commission.

Subcommittee Goals

As the meetings progressed, subcommittee members worked with leadership to refine and target the guiding statement: End the crisis-assistance-crisis cycle by centering energy affordability and facilitating customers sustainably affording their energy bills by providing all households with uninterrupted access to affordable, sufficient energy in an efficient, healthy, and sustainable manner. This ideal system/program design should achieve this while also:

- **Ensuring equitable distribution** in the access to, use of, and outcomes from energy affordability and assistance policies/programs
- **Centering impacted community priorities** and participation in policy/program development, accountability, and assessment
- **Treating customers with dignity**, enabling them to live comfortably, and not penalizing customers for an inability to pay their bills
- **Coordinating and communicating clearly** with relevant state agencies to integrate state policy goals, including those related to healthy homes and climate change

With this guidance in mind, through feedback from the subcommittee members, leadership created and refined a goals list. The goals include²²:

- Eligibility
 - Simplify verifications
 - O Streamline/automate design
 - O Make eligibility more flexible
 - O Implement any pilot learnings
- Affordability
 - O Arrearage management
 - Fixed payment programs, including the percentage of income payment plan (PIPP)
- Accessibility
 - O Evaluate and improve customer journey
 - O Home energy assessment/EWR and EE offerings
 - O Encourage landlords to address EWR programs

²² 2021-10-26 AAA Goals updated.docx

Progress

The subcommittee is currently addressing the first chosen goal from the initial survey: eligibility. The subcommittee agreed to start with the utility-based programs (the Senior Credit, Residential Income Assistance Credit [RIA], and the Low-Income Assistance Credit [LIA]) since the MPSC and utilities have the most control over them as opposed to legislatively mandated and restricted programs like MEAP, SER, HHC etc.

At the September meeting, leadership began the first phase of the goals structure: choosing a goal and collecting input. AAA leadership collected more specific feedback on what members wanted to learn about and improve upon in the utility assistance programs. What became clear during this process was the desire for a more automated enrollment process and the need for indepth education on how utilities identified and enrolled low-income customers in the assistance programs.

At the October subcommittee meeting, leadership began the next phase of the goals structure: researching the goal. All utilities with the aforementioned assistance credits presented their customer journey processes (DTE, Consumers Energy, Semco, Indiana Michigan, and UPPCO). This includes outreach programs, customers automatically being enrolled in the credits when they receive SER, and referrals for customers to receive other forms of assistance.

This process was enlightening for the AAA Subcommittee members and answered one of the largest questions that was previously posed to the utilities: is the enrollment process automated? Members learned that many processes were automatic for assistance recipients; however, the utilities explained that, in order for the enrollment process to become more automated, income data from outside the utility would be needed. Together, with the current available information, members and the utilities viewed one potential solution: that DHHS should provide a list of all eligible low-income customers (those at or below 150% of the Federal Poverty Level) to the utilities for assistance, since the utilities struggle to identify those in need. Committee members acknowledge that data privacy remains an ongoing discussion within the broader workgroup as well as in this subcommittee.

The overall process has been productive so far, since decisions on addressing goals are decided upon democratically. Participants can provide their unbridled feedback—in the meeting chat, verbally, or in the suggestion box that is always open—and leadership provides education opportunities where there is need so that informed decisions can be made.

Challenges

The largest challenge in this process is that many issues identified in the systems that control the low-income assistance structure are outside of the MPSC's jurisdiction. While the AAA subcommittee is currently exploring solutions to their first issue of streamlining eligibility and enrollment, members are already discovering that it may be difficult for DHHS and other partner agencies to implement their recommendations. The subcommittee is likely to be further daunted by the fact that it could take legislation to change other programs like LIHEAP and MEAP.

Another challenge is community representation. The subcommittee does not include members of the impacted community which they represent. Leadership recognized this as an issue and believes this is the goal of the Outreach and Education Subcommittee. However, leadership also took this issue into account when choosing a new stakeholder leader to replace Tanya Paslawski. Choosing a director of a community service agency that deals directly with low-income assistance recipients will help the subcommittee better understand the issues that face the low-income community.

Leadership must confront the reality that if they cannot deliver on their promises and recommendations, they will likely lose trust from their stakeholders that they are continuously trying to build. This lack of trust was discovered in the first survey leadership sent out, in which they included an open answer for members to express concerns and the main concern expressed by some stakeholders was that leadership would not accomplish their goals. However, from this distrust, leadership was able to formulate a methodological way to accomplish its goals and they believe that has helped to build trust. The largest positive leadership has seen coming out of this process is the active engagement. Most members are willing to participate in some way, whether that is leading a research group, openly telling leadership if something doesn't sit well with them, or providing their opinion on how to achieve an ideal affordability system. With this level of input, MPSC Staff is made aware of how certain systems do not work well and are able to have more ideas brought to them to form a better affordability system. The high level of participation and input from advocates increases the likelihood of change occurring. However, even if issues are outside of Staff's control, this collaborative still informs advocates' efforts by providing insight into the Commission, other agencies and utilities making it more possible for them to target the institution that they want to see change in.

Recommendations

The AAA Subcommittee does not have any recommendations for the Commission at this time. However, the group has agreed that utilities require access to more customer eligibility information from DHHS to automatically enroll customers in assistance based on their participation in other assistance programs like Medicaid and food assistance. A large proportion of the members of the AAA Subcommittee strongly believe that there should be fewer barriers to receiving assistance and that customers should not be burdened by applying for each form. They should instead be automatically enrolled in any assistance they're eligible for if they have already applied to other forms. While this is outside the purview of the Commission, the Committee is in dialogue with DHHS on whether this is possible and what steps would be needed to make this change.

While this report has been reviewed by the AAA Subcommittee as well as the EAAC, and input from their members has been included where possible, the AAA Subcommittee recognizes that all participants will not agree with the work they are doing or how this report reflects the work that is being done.

Outreach and Education Subcommittee

Charge from the Commission

The Commission charge assigned to the Communication and Engagement Subcommittee is to establish regular mechanisms for stakeholders to provide input on improving communication and materials and broaden its outreach to groups traditionally not a part of utility communications.²³ In addition, the Commission directed Staff to work with stakeholders to improve the dissemination of energy assistance information too difficult to reach customers, including collaborating with the MI Power Grid Education and Participation Workgroup.

Leadership

To ensure a community-oriented subcommittee, it was deemed critical to have strong, grass-roots stakeholder leadership to guide the process in developing trusted community relationships for the expansion of input in policy development and for appropriate outreach to non-traditional stakeholders. Briana DuBose, Director of Strategic Community Initiatives for EcoWorks, and Briana Parker, Policy Manager for Elevate, were invited to co-lead the subcommittee and subsequently have provided overarching leadership. In addition, to ensure collaboration with the MI Power Grid Customer Education and Participation Workgroup and ongoing Commission communications processes, Reka Holley Voelker, Communications Section Manager and Legislative Tribal Liaison for the MPSC, agreed to co-lead the group with Anne Armstrong, Director of the Customer Assistance Division.

Membership²⁴

The Outreach and Education Subcommittee recruited its members from announcements made at the monthly EAAC meetings. In addition, a DTE participant was recruited to ensure that utility outreach efforts in SE Michigan were represented.

Meetings

Leadership began meeting biweekly in June 2021 to lay the groundwork and to build a community- based process. Briana Parker and Briana Dubose advised that to achieve the goals of expanded outreach for communications and participation in policy development, a deliberate and strategic process must be designed with community involvement, which would take time to develop. The summer leadership meetings were focused on developing this process, including the sharing of materials for distribution on energy resources.

The first full meeting was held in September 2021 under the organization and auspices of Briana Parker and Briana DuBose. The Outreach and Education Subcommittee meets monthly and works through a team structure to achieve its goals consisting of three work groups: 1) 5 Community

²³ U-20757, 02/18/2021, page 20

²⁴ Refer to Appendix D for a list of subcommittee members

Town Halls "What Does Energy Affordability Mean?"; 2) Comprehensive Energy Assistance Resource; and 3) Immediate Assistance for Communities. These work groups are more fully described below.

Collecting feedback/soliciting input

The process for collecting feedback and soliciting input for this subcommittee takes place through several processes: 1) Monthly Outreach and Education Subcommittee meetings whose participants include advocacy groups, utilities, and non-profits; 2) Biweekly Outreach and Education Subcommittee Leadership meetings for strategy development and sharing of materials; and 3) Independent meetings of the stakeholder co-leads with Ad-Hoc Energy Policy group of advocates and community leaders.

Goals

The greater charge from the Commission is to continue outreach and education related to COVID-19 resources, to expand opportunities for stakeholders to provide input on improving communications, to broaden its outreach to groups traditionally not a part of utility communications, and to work with stakeholders to improve the dissemination of energy assistance information to difficult to reach customers.

These goals fall into two priorities: 1) Disseminating information on COVID-19 utility assistance to communities in need in the next 12 to 18 months; and 2) Build long-term community-based relationships for policy input and on-going communication on energy resources and services.

While the committee leadership worked on strategies for leading from community, the MPSC Communications staff also shared the components of a winter heating season communications tool kit and received feedback, responded to the request for energy assistance information in Bengali for the large Bangladeshi community in Detroit, and asked for help in reaching grass roots leaders for the dissemination of the tool kit.

Strategy To Achieve Goals

The subcommittee developed a structure to use group discussion from varied sectors to develop strategies to achieve the goals. The three groups consist of:

1) The Community Outreach Team whose goal is to expand community outreach on energy assistance and services by working with five communities across the state to develop community town halls early in 2022.

2) The Comprehensive State Resource Team, whose goal is to develop an easily accessible compilation of energy resources by assessing existing resources and analyzing ways to improve and assemble these resources.

3) The Immediate Assistance for Cases Team whose goal is to problem solve difficult cases and particular community concerns by developing a process.

Progress

The Outreach and Education Subcommittee made significant organizational progress in 2021, including establishing a solid co-leadership team, recruiting members from diverse sectors, and establishing a stakeholder driven strategy to achieve the subcommittee's goals.

Challenges

The Outreach and Education Subcommittee has a long-term vision of working with stakeholders to not only educate customers on energy assistance, customer protections and energy efficiency services, but to build capacity of high-energy and impacted communities to meaningfully participate in policy development and change. This is challenging because of the time and effort needed to build trust with high-energy burden, high-impact communities before they feel comfortable coming to the table. This also includes assisting in building communications tools that are accessible to these communities. In the past community members have not always been treated respectfully and communication and follow-up has been intermittent. The group believes it is important to identify a direct need for resources that would allow for training, technical assistance, pay for participants time, and materials for outreach. This is critical to allow for equal accessibility and opportunity for citizens from impacted communities to be stakeholders.

Among the areas that the committee leadership believes could be improved upon and outcomes that the committee's work could impact over time include:

- Improving community relations
- Building trust/foundation of goodwill during times of crisis
- Building stronger local and regional partnerships
- Contribute to higher customer satisfaction
- Continue to identify means to increase access to information in partnership with the EWR-LI workgroup, other EAAC subcommittees and partnerships with Coalition to Keep Michigan Warm, MDHHS, etc.

The Outreach and Education Subcommittee also sees an area of improvement for assisting the MPSC in integrating social equity into MPSC policy and practices. The group will reach out to the Commission's Diversity Equity and Inclusion committee in the next year, as well as continue to work closely with the MI Power Grid Customer Education and Participation workgroup.

Among the outcomes this subcommittee could impact with its work and other EAAC subcommittees are:

- Work toward equitable utility service to the entire community with other Commission initiatives and with stakeholders.
- Provide high-impact community input on ways to reduce and mitigate utility impacts to the community, especially disproportionate impacts to disadvantaged communities.
- Provide a framework to engage the community as a part of the decision-making about plans, projects, and programs.

- Provide a framework to partner with nonprofits, community-based organizations, neighborhood organizations to look at ways to leverage utility investments to benefit the whole community.
- Assist in documenting the social cost savings from decrease in shutoffs.

Recommendations

There are no recommendations from the Outreach and Education Subcommittee at this time.

The co-leads of the group agreed that in building community relationships, the first step in expanding community input into communications and policy, as well as for disseminating information on programs and resources, is to develop a deliberate process to build foundational trust. This is the primary goal for 2022, even as information on current resources continue to be distributed.

Data and Regulatory Analysis Subcommittee

Charge from the Commission

The Commission charge assigned to the Data and Regulatory Analysis Subcommittee begins with the discussion that 'examination of a long-term data collection strategy is worthwhile, and therefore, adopts the Staff's recommendation, including the recommendation to engage with NARUC, and directs the EAAC to take on this initiative in coordination with ongoing data collection that the Commission has directed utilities to continue with this order'.²⁵ This directive includes supporting Staff's recommendation that capturing specific demographic information and energy burdens of customers would prove beneficial. The Commission further directs the Staff, in its efforts to add demographic information into the shutoff and arrearage data, to consider recommendations from the Commission's Diversity, Equity, and Inclusion (DEI) initiative. The DEI initiative is intended to impact every area of the Commission's work and would be particularly helpful in the Staff's long-term data collection strategy that will involve looking at race, gender, income, and zip code information in gathering demographic information.²⁶ Staff believes it is important for the subcommittee to include metrics on the extent to which low-income and senior households are receiving energy waste reduction and efficiency services. As mentioned above, Staff started this process with MDHHS and the regulated utilities through the LIHEAP Direct Support program under the American Rescue Plan Act, which may provide the subcommittee with a foundation to consider. In addition, it is recommended that the subcommittee consult with the MI Power Grid Customer Education and Participation workgroup to understand the issues related to data access and privacy and ensure that any recommendations are consistent with Commission policy in this area.

²⁵ Case No. U-20757, 02/18/2021, pages 18-19

²⁶ Case No. U-20757, 02/18/2021, pages 19

Another Commission directive for this subcommittee is a review of Part 7 of the Commission's billing rules, Mich Admin Code R 460.128 *et seq.*,.²⁷

Leadership

The staff lead for the Data and Regulatory Analysis Subcommittee is Chris Forist, Manager of the Compliance and Investigation Section which oversees the utility compliance with the billing rules, including Part 7. In addition, Ms. Forist works closely with Jake Thelen in the Compliance and Investigation Section, who is the lead on the utility shutoff and arrearage monthly data submission and public data-site process.

The stakeholder lead is under consideration and will be announced in early 2022.

Meeting Cadence

A decision was made after the first meeting of the EAAC to delay the implementation of this subcommittee for several reasons. One is that the monthly data submission by the Commission per U-20757 began in October 2020 and Staff agreed it would be beneficial to allow the data submission to continue for longer than one year before making changes to better understand the strengths of the existing data sets and possible gaps. In addition, this subcommittee will be able to build on and coordinate with the efforts of the other EAAC subcommittees, the MPSC Diversity, Equity and Inclusion internal committee, and the MI Power Grid Customer Education and Participation workgroup.

Discussion on the Future of the EAAC

Discussion amongst staff and stakeholders on the future structure of the relationship of the EWR Low-Income Workgroup and the EAAC have been on-going. As referenced above, the initial survey of participants of the EWR Low-Income group and the EAAC indicated that stakeholders saw value in having one collaborative, but still expressed concerns about EWR low-income issues being adequately addressed. Throughout the year, stakeholders have been consistent in expressing their views that the two groups are interrelated but not the same in nature. At the November EAAC meeting several stakeholders expressed the opinion that the two groups should continue as separate entities. Both groups have separate and on-going project sub-groups, and the content of the larger, whole group meetings are different as well. For example, the EAAC continues to focus on streamlining the energy assistance and protection system with the goal of reducing the number of households with unsustainable energy burdens, while the EWR Low-Income group is focusing on health and safety projects, ensuring EWR is in the referral process for 211.org. and developing strategies for workforce development related to EWR.

Staff believes that consistent interaction and a regular, perhaps quarterly, joint meeting to allow the groups to bring their separate areas of expertise together and explore intersection will benefit

²⁷ Case No. U-20757, 02/18/2021, page 19

the Commission and the diverse stakeholder groups participating in the workgroups. Indeed, as it has developed thus far, the concerns related to over-burdening stakeholder groups with the addition of another collaborative appears to be unfounded; however, some stakeholders do have a desire for more coordination and fewer meetings.

While the participants in each group operate in separate areas of interest and specialization, there is a continuing need to tie energy waste reduction services to energy assistance programs and to develop policy that integrates both areas. One stakeholder stated that "reducing energy costs through energy efficiency/weatherization must be an essential part of any overall policy strategy for energy affordability. It makes no sense for anyone...the customer, other ratepayers, or taxpayers... to pay for energy waste i.e., energy use that could be avoided if a home was energy efficient." This reinforces the desirability of having periodic joint sessions where the diverse stakeholders are brought together to ensure that energy low-income energy and energy waste reduction policy development are integrated to the extent possible. Certainly, one of the greatest takeaways from the EWR Low-Income Workgroup and the EAAC is the meeting and introduction of other people and programs and specialties. This recognition of the intersectionality of programs and individuals has opened broad new perspectives of best practices across the State.

It appears from stakeholder feedback that, if a formalized relationship is deemed desirable, it should not affect the on-going work of the separate groups.

EAAC Next Steps

As stated in the order issued on February 18, 2021, in Case No. U-20757, "The Commission anticipates that the work done in the EAAC will continue through 2021, carrying over into 2022, and possibly beyond." Because of the broad charge to the EAAC and the intent to build a shared stakeholder process with the EWR LI workgroup, the EAAC devoted much of 2021 to developing the collaborative structure and to educating Staff and stakeholders on approaches to energy affordability, the current state of Michigan's energy assistance system, and utility and agency approaches to assisting at-risk customers. Much work remains to be done with the subcommittees in place to achieve significant work in 2022. For example, the Data and Regulatory Analysis Subcommittee plans to begin in early 2022 to develop recommendations for a long-term data collection strategy that will inform Staff and stakeholders of customer safety and protection in an equitable manner. This effort will also include collaboration with the data access and privacy work of the MI Power Grid Customer Education and Participation workgroup and the Commission DEI Committee.

As mentioned above, stakeholders identified additional challenges and goals that they would like to see the EAAC pursue more actively. Among the outcomes the advocacy community believe the EAAC subcommittees could impact are:

• Work toward equitable utility service to the entire community with other Commission initiatives and with stakeholders.

- Provide high-impact community input on ways to reduce and mitigate utility impacts to the community, especially disproportionate impacts to disadvantaged communities.
- Provide a framework to engage the community as a part of the decision-making about plans, projects, and programs.
- Provide a framework to partner with nonprofits, community-based organizations, and neighborhood organizations to look at ways to leverage utility investments to benefit the whole community.
- Assist in documenting the social cost savings from a decrease in shutoffs.

In addition, several stakeholders were vocal about the on-going need to require energy waste reduction and weatherization services to energy assistance programs as a key component of the energy affordability equation. One stakeholder recommended increasing the priority and funding for energy efficiency and weatherization with requirements for linkage to energy bill assistance efforts.

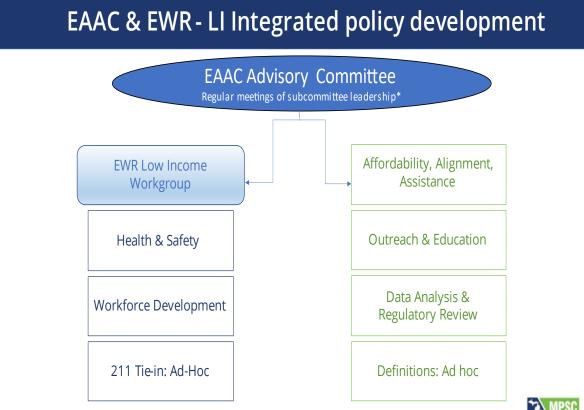
Recommendations

EAAC Specific Recommendations

- Staff recommends the Commission continue the Energy Affordability and Accessibility Collaborative efforts for at least two additional years with priority on stakeholder participation and leadership, and assessing energy affordability and accessibility holistically, especially through linking energy waste reduction services and energy assistance programs.
- Staff recommends the following proposed structure of the collaborative:
 - Create an Energy Affordability and Accessibility Advisory Committee comprised of leadership from each EAAC and EWR-LI Subcommittee to balance MPSC staff, stakeholder participation and sector representation. The existing EWR-LI steering committee could constitute the EWR-LI committee representation. The EAAC as such would not meet outside of the policy summits recommended below. EAAC work would continue under the subcommittees.
 - Seek diverse representation to ensure diversity of sector, geography, race and ethnicity, including representation from historically marginalized populations. If necessary, additional members could be added outside of subcommittee leadership to meet this goal.
 - The Advisory Committee will determine the cadence of meetings with the charge to ensure cross-pollination of policy development across sectors and groups, and to support the subcommittees in reaching goals.
 - Under the leadership of the Advisory Committee, the EAAC and EWR-LI workgroups would host one or two Low-Income Energy Policy Summits in 2022 to bring education and recommendations to both groups with the goal of providing actionable recommendations to the Commission.

- Staff recommends that the EWR-LI and EAAC and their respective subcommittees redouble efforts to recruit members of high energy burden, high impact communities into the workgroups.
- Staff recommends the EAAC Advisory Committee collaborate with the MPSC DEI Committee and the MPSC Communications section as well as take into account recommendations made by the MI Power Grid Customer Education and Participation workgroup when available.
- Staff recommends that the EAAC/EWR-LI collaborate with the Governor's Poverty Task Force, the Governor's Council on Climate Solutions, and the Council on Future Mobility and Electrification to ensure consistency in policy development and to support the goals of these two groups.
- Staff recommends a progress report with any recommendations to be filed by December 16, 2022, although interim consensus recommendations could come before the Commission in advance of that date.

Energy Affordability and Accessibility Advisory Proposed Committee Structure



*Subcommittees will meet by group consensus to fulfill charge.

General Recommendations

- Staff recommends the IOUs continue monthly shutoff and arrearage data submissions until the Commission adopts a long-term data collection strategy as developed by the EAAC Data and Regulatory Analysis Subcommittee in collaboration with the MPSC DEI committee, the MI Power Grid Customer Education and Participation Workgroup and any other staff efforts at data collection.
- Staff recommends continued informal collaboration with stakeholders to facilitate effective response to customer needs during the on-going pandemic.

Conclusion

In 2021, the pandemic continued to impact the safety and wellbeing of residents in Michigan, particularly low-income and senior households experiencing difficulties in paying their energy bills. MPSC Staff, peer agencies, utilities and other stakeholders collaborated formally and informally to ease the impacts. Staff built upon work that was completed in the first year of the pandemic, broadening its ability to respond quickly to customer concerns, new federal programs, and pandemic-related stress.

The Commission directive to create the Energy Affordability and Accessibility Collaborative helped improve this collaboration in substantive ways. The organization and development of the stakeholder/staff led collaborative established a foundation for the Commission to fulfill its mission to serve the public by ensuring safe, reliable, and accessible energy and telecommunications services at reasonable rates²⁸ through making well-informed decisions at every level of the organization and meaningfully engaging the public.²⁹

The EAAC has much work to do to broaden the stakeholder/staff led process by building trusted relationships with high impact, high energy burden communities and ensuring meaningful input into policy development and outreach strategies. While these relationships take time to build, the Collaborative must still move forward with stakeholder education and policy design. The collective leadership of the EAAC is committed to balancing this tension to positively impact Michigan's vulnerable residents and communities.

²⁸ MPSC mission statement

²⁹ MPSC vision statement in the 2021-2025 Strategic Plan

Appendices

Appendix A: Acronyms List

AAA	Affordability, Alignment and Assistance Subcommittee
ALICE	Asset Limited, Income Constrained, Employed
APP	Affordable Payment Plan
ARP Act	American Rescue Plan Act
CARES Act	Coronavirus Aid, Relief, and Economic Security Act
CE	Consumers Energy
CERA	Covid Emergency Rental Assistance
CUB	Citizens Utility Board
DEI	Diversity, Equity and Inclusion
DTE	DTE Energy
EAAC	Energy Affordability and Accessibility Collaborative
EE	Energy Efficiency
EGLE	Environment, Great Lakes, and Energy
EWR	Energy Waste Reduction
EWR-LI	
FAP	Energy Waste Reduction Low-Income Workgroup Food Assistance Program
FPL	Federal Poverty Level
FY	Fiscal Year
HHC	Home Heating Credit
IOU	Investor-Owned Utilities
IRP	Integrated Resource Plan
LIA/LIAC	Low Income Assistance Credit
LIEAF	Low Income Energy Assistance Fund
LIHEAP	Low-Income Home Energy Assistance Program
MDHHS/DHHS	Michigan Department of Health and Human Services
MEPA	Michigan Energy Assistance Program
MECA	Michigan Electric Cooperative Association
MEGA	Michigan Electric and Gas Association
MIHAF	Michigan Homeowners Assistance Fund
MIHAP	Michigan Homeowners Assistance Program
MMEA	Michigan Municipal Electric Association
MPSC	Michigan Public Service Commission
MSHDA	Michigan State Housing Development Authority
NARUC	National Association of Regulatory Utility Commissioners
NEUAC	National Energy and Utility Affordability Coalition
PIPP	Percent-of-Income Payment Plan
RIA	Residential Income Assistance Credit
SEMCO	SEMCO Energy Gas Company
SER	State Emergency Relief
SMART	Specific, Measurable, Actionable, Relevant, and Time-bound
SNAP	Supplemental Nutrition Assistance Program
SPP	Shutoff Protection Plan
SVdP	
	St. Vincent de Paul
UPPCO	St. Vincent de Paul Upper Peninsula Power Company
UPPCO WAP	

Appendix B: Energy Security Definition Sources

Elements of these definitions were considered by the Ad-Hoc Definitions Subcommittee

International Energy Agency

https://www.iea.org/

"The uninterrupted availability of energy sources at an affordable price."

Pika Energy

<u>https://www.pika-energy.com/blog/improving-home-energy-security/</u> "Energy security means having energy available when you need it, at a cost that you agree with."

United Nations Development Program, H. Khatib <u>https://www.undp.org > undp > Sustainable Energy</u> *"The continuous availability of energy in sufficient quantities and at reasonable prices."*

The federal government of Australia

<u>https://www.energy.gov.au/government-priorities/energy-security</u> "The adequate supply of energy across the electricity, gas, and liquid fuel sectors."

Sciencedirect.com

<u>https://www.sciencedirect.com/topics/engineering/energy-security</u> "Having access to clean, reliable and affordable energy services for cooking, heating, lighting, communications and other productive uses."

Murkowski, Lisa and Scott, Tim "Plenty at stake: indicators of American energy insecurity," 2014. https://www.energy.senate.gov/services/files/075f393e-3789-4ffe-ab76-025976ef4954

"A useful definition of energy insecurity comes not from American law, but from Great Britain's Warm Homes and Energy Conservation Act. *It defines energy security to include both fuel poverty, the inability to pay for the heating or cooling required to maintain a home at a reasonable temperature, and the loss of access to electricity through cessation of service due to non-payment or other factors."*

The Meaning of Energy Security Depends on Who You Are <u>https://www.brookings.edu/opinions/the-meaning-of-energy-security-depends-on-who-you-are/</u>

Energy Security Definition Literature Review with 15 dimensions https://wires.onlinelibrary.wiley.com/doi/abs/10.1002/wene.268

Appendix C: Acknowledgements

Presenters and Moderators³⁰

Aimon Conduce English	Project Director	
Aimee Gendusa-English	Project Director	National Community Action
		Partnership
Angela Sterner	MSW	The Salvation Army
Bethany Stutzman	Community Solutions Director	United Way Jackson
Briana DuBose	Director of Strategic	EcoWorks, Detroit
	Community Initiatives	
Briana Parker	Policy Manager	Elevate
Eiffel Bayaban	Policy Intern	Elevate
Elaina Braunschweig	Department Analyst in the	Michigan Public Service Commission
	Rates and Tariff Section	
Eric Pardini	Director	Public Sector Consultants
Gabe Dusenbury	Section Head of Rate Financial Analysts	Colorado Public Utilities Commission
Jake Thelen	Investigation and Compliance	Michigan Public Service Commission
Jamie Curtis	Grant Administrator for	Michigan Public Service Commission
	Michigan Energy Assistance	_
	Program (MEAP)	
Joe Magee	Energy Policy Manager in the	Pennsylvania Public Utility
-	Bureau of Consumer Services	Commission
Karen Gould	Manager of the Energy Waste	Michigan Public Service Commission
	Reduction Section	
Katrina Metzler	Executive Director	National Energy and Utility
		Affordability Coalition (NEUAC)
Kelly Rose	Chief Housing Solutions	Michigan State Housing
	Officer	Development Authority (MSHDA)
Luke Shaefer	Hermann and Amalie Kohn	Gerald R. Ford School of Public
	Professor of Social Justice and	Policy, University of Michigan
	Social Policy, Associate Dean	
	for Research and Policy	
	Engagement	
Kristin Bolds	Director of Community	St. Vincent de Paul (SVdP)– Detroit
	Assistance	
Kurt Cooper	Regulatory Service	Indiana Michigan Power
Mary Wilkins	Program Consultant	The Salvation Army
Monica Martinez	Principal	Ruben Strategy Group LLC

³⁰ BIOS for Presenters and Moderators

Niki Fanjoy	Division Director for Heat and	TrueNorth Community Services
	Energy Programming	
Reka Holley Voelker	Manager of the	Michigan Public Service Commission
	Communications Section,	
	Legislative and Tribal Liaison	
Roger Colton	Principal	Fisher, Sheehan, & Colton
Sean Scane	Program Director for MEAP	United Way for Southeastern
	and CERA Operations	Michigan
Shama Mounzer	Executive Director	Wayne Metropolitan Community
		Action Agency (WMCAA)
Tammy Bair	Departmental Manager of	Michigan Department of Health and
	Economic Stability	Human Services (MDHHS)
	Administration	
Tanya Paslawski	Senior Consultant	5 Lakes Energy (now with NARUC)
Tasha Ball	Data and Performance	United Way for Southeastern
	Manager of 211	Michigan
Tremaine Phillips	Commissioner	Michigan Public Service Commission
Wanda Jones	Manager of the MEAP Grant	Michigan Public Service Commission
	Section	_

MPSC Staff

Subcommittee Leaders

Anne Armstrong	Definitions Ad-Hoc Subcommittee
Brad Banks	Mary Wilkins – Salvation Army
Karen Gould	Anne Armstrong – MPSC
Fawzon Tiwana	Outreach and Education Subcommittee
Elaina Braunschweig	Briana DuBose – EcoWorks
Jamie Curtis	Briana Parker – Elevate
Cheryl Rojas	Reka Holley – MPSC
Bethany Doyle	Anne Armstrong – MPSC
Angela Adkins	Affordability, Alignment and
Amy Rittenhouse	Assistance Subcommittee
	Amy Bandyk – Citizens Utility Board of
	Michigan (CUB)
	³¹ Tanya Paslawski – 5 Lakes Energy (now
	with NARUC)
	Kristen Bolds, Saint Vincent De Paul
	Elaina Braunschweig – MPSC
	Jamie Curtis – MPSC

³¹ Tanya Paslawski stepped down in October when she accepted a new position with NARUC. Kristen Bolds became her replacement.

Appendix D – Subcommittees Participant List

EAAC Definitions-Ad Hoc Subcommittee

Martin Kushler	ACEEE
Zoe Ahlstrom	Consumers Energy
Antonette Noakes	Consumers Energy
Benjamin Gulker	DHHS
Maria Christian	DTE Energy
Denise Diz	DTE Energy
Susan Cervantes	Kent County Community Action
Wende Randall	Kent County Essential Needs Task Force (ENTF)
Julie Cassidy	Michigan League for Public Policy
Al Freeman	Michigan Public Service Commission
Anne Armstrong	Michigan Public Service Commission
Katie Smith	Michigan Public Service Commission
Amy Rittenhouse	Michigan Public Service Commission
Julie Cassidy	MLPP
Annika Brindel	National Housing Trust
Mary Wilkins	Salvation Army
Patrick Leahy	SEMCO
Kristen Bolds	SVdP-Detroit
Marissa Boerman	TrueNorth Empower
Niki Fanjoy	TrueNorth Community Services

EAAC Affordability, Alignment and AssistanceA Subcommittee

Martin Kushler	ACEEE
Michelle LaJoie	Community Action Alger Marquette
Amy Glapinski	Consumers Energy
Antonette Noakes	Consumers Energy
Eric Pardini	Consumers Energy
Hubert Miller	Consumers Energy
Yvonne Lewis	Consumers Energy
Zoe Ahlstrom	Consumers Energy
Nick Sakon	DHHS
Ben Gulker	DHHS-BCAEO
Cheryl Stafford	DTE Energy
David Becker	DTE Energy
Denise Allard	DTE Energy
Denise Diz	DTE Energy
Jennifer Schmidt	DTE Energy
Maria Christian	DTE Energy
Tanisha Rawls	DTE Energy
Alexis Blizman	Ecology Center

Gina Kostoff Wende Randall Synia Gant-Jordan Dan Dundas Sylvia Orduño Nicholas Occhipinti Al Freeman Anne Armstrong Brad Banks Katie Smith Nathan Burnand **Roberta Marks** Maddie Wazowicz Annika Brindel Laura Goldberg Eric Schrader Tom Page Jen Dennis Laurie Owens Patrick Leahy **Ryan Houck** Jessica Crawford Kasey McNeally Tonya Swenor **Kristen Bolds** Angela Sterner Niki Fanjoy Sean Scane Heather Kapustka Jodi Formolo Ben Dueweke Sophia Palmer Aaron Kraft Shama Mounzer Chris Carper Shannon Burzycki

Indiana Michigan Power/AEP Kent County Essential Needs Task Force (ENTF) Legacy & Love MEGA **MI Welfare Rights Organization** Michigan LCV Michigan Public Service Commission Midwest Energy Efficiency Alliance National Housing Trust NRDC People's Gas Delivery (WEC Energy Group?) RiverStar **SEMCO Energy** SEMCO Energy SEMCO Energy SEMCO Energy State of Michigan Superior Watershed Partnership Superior Watershed Partnership **SVDP** Detroit The Salvation Army **TrueNorth Community Services** United Way for Southeastern Michigan United Way of Jackson County Upper Peninsula Power Company (UPPCO) Walker-Miller Energy Services Walker-Miller Energy Services Washtenaw County OCED Wayne Metro Community Action Agency WEC Energy Group (MGU/UMERC) WEC Energy Group (MGU/UMERC)

EAAC Outreach & Education Subcommittee

Amy Bandyk Michelle LaJoie Amy Glapinski Antonette Noakes Kristen Goodman Kristina Coppernoll Citizens' Utility Board (CUB) Community Action Alger Marquette Consumers Energy Consumers Energy Consumers Energy Consumers Energy

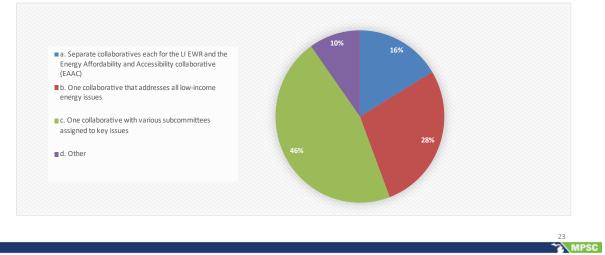
Yvonne Lewis Cheryl Stafford Denise Diz Alexis Blizman Briana DuBose Briana Parker Emily Damaska Gina Kostoff Wende Randall Al Freeman Amy Rittenhouse Anne Armstrong Brad Banks Katie Smith Nathan Burnand Christine Adams Maddie Wazowicz Tanya Paslawski Laura Goldberg Sophia Usow Jim Van Sickle Kasey McNeally **Kristen Bolds** Aimee Tank Althea Anderson **Kizzie Kelly** Lindsey Vaclav Andrea Maloy Marissa Boerman Niki Fanjoy **Bethany Stutzman** LaSharon Laster Sophia Palmer

Consumers Energy DTE Energy DTE Energy **Ecology Center EcoWorks-Detroit** Elevate Holland Board of Public Works Indiana Michigan Power/AEP Kent County Essential Needs Task Force (ENTF) Michigan Public Service Commission Midwest Energy Efficiency Alliance NARUC Natural Resources Defense Council (NRDC) SEEDS SEMCO Energy Superior Watershed Partnership SVdP-Detroit SVdP-Detroit SVdP-Detroit SVdP-Detroit SVdP-Detroit The Salvation Army True North Empower **TrueNorth Community Services** United Way of Jackson County Unknown Walker-Miller Energy Services

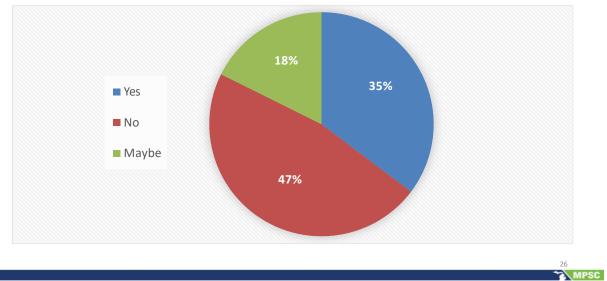
Appendix E - Survey Results

EAAC/EWR-LI Structure³²

1. What do you consider to be the best way to coordinate energy affordability, low-income EWR, energy assistance and accessibility?

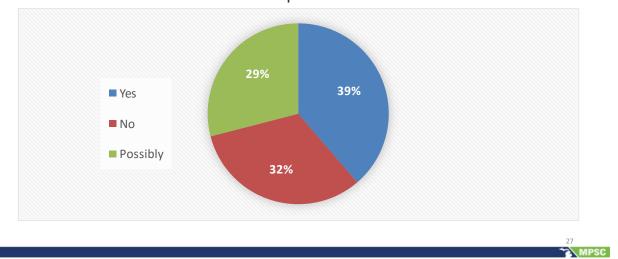


6. Are there concerns that adequate time will be spent on LI issues?



³² April 8, 2021, EAAC Meeting Presentation - Slides 23, 26, 27

7. Are there concerns about loss of focus or direction for the EWR LI Workgroup or topic groups getting lost or not completed?



EAAC Priorities³³

 In the February 18 order for Case #U -20757 order, the Commission laid out a series of priorities to be tackled by the new Energy Affordability and Accessibility Collaborative (EEAC) in coordination with the LI -EWR workgroup. Please rank the issues in order of urgency or importance to you.



³³ April 8, 2021, EAAC Meeting Presentation - Slide 24

Appendix F – Additional Resources

Timeline for federal energy assistance related to COVID-19³⁴

Interrelationships between energy assistance programs³⁵

High level overview of energy assistance programs in Michigan³⁶

³⁴ Energy Assistance Timeline 7.22.21 (michigan.gov)

³⁵ FY20 Assistance Programs and Credits diagram 09032021 (michigan.gov)

³⁶ Federal and State Energy Assistance Programs Summary 11-12-21 743477 7.pdf (michigan.gov)

UTILITY ASSISTANCE TIMELINE

CARES Act

\$900 million supplemental for LIHEAP released on May 8, 2020. Available through September 30, 2021

FY21 Regular LIHEAP Appropriation

\$3.7 billion (99%) released in November 2020 and February 2021. Available through September 30, 2021

Emergency Rental Assistance Program (Part 1)

\$25 billion released January 2021. Generally available through September 30, 2022

LIHEAP Supplemental Funding

\$4.5 billion, passed March 2021 in ARP, released May 4, 2021. Available through September 30, 2022

Low-Income Home Water Assistance Program (LIHWAP)

\$1.1 billion, passed in December 2020 & March 2021. Available through December 31, 2023

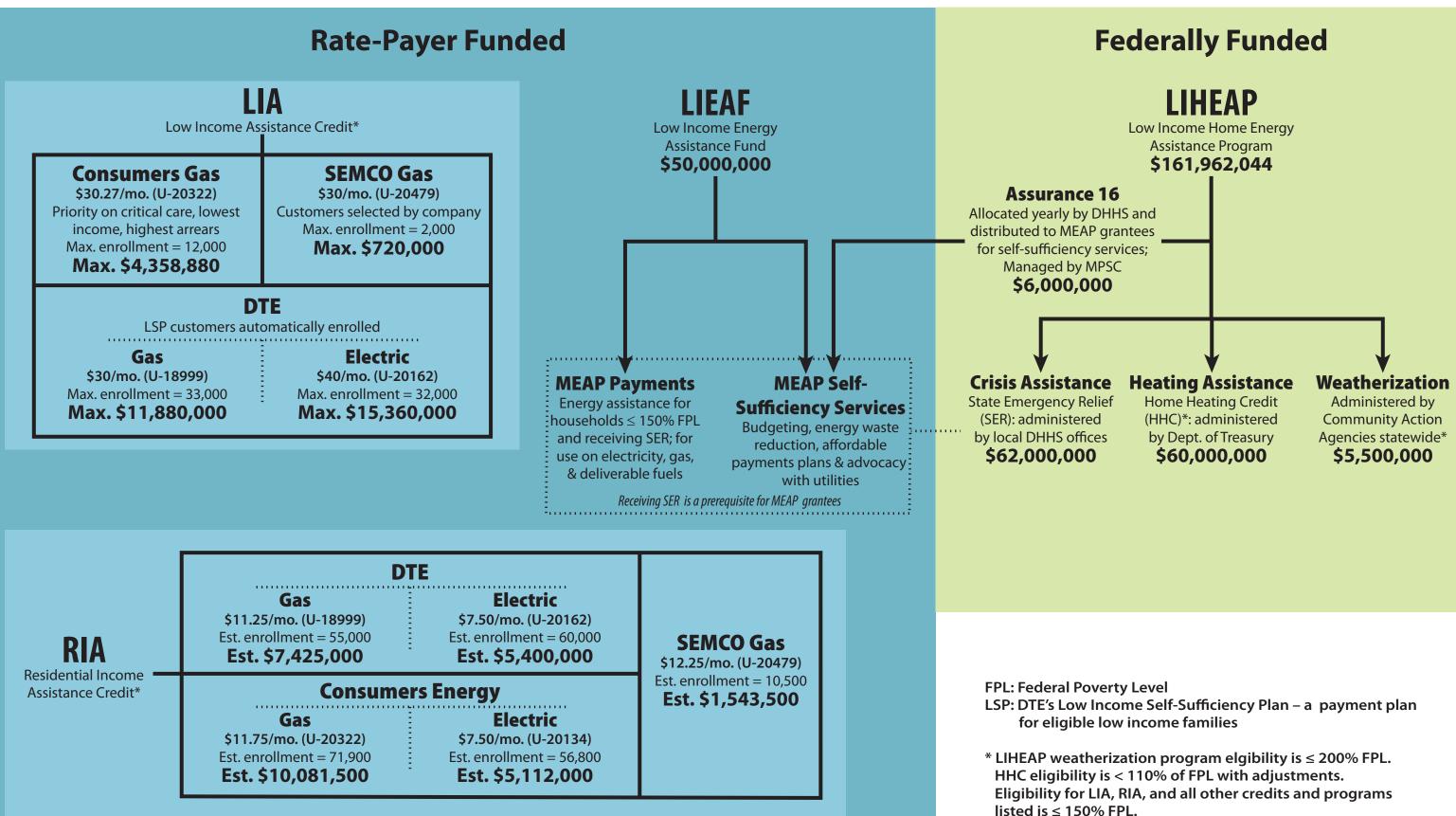
Emergency Rental Assistance Program (Part 2)

\$20.25 billion, passed March 2021 in ARP. Generally available through September 30, 2025

Homeowner Assistance Fund

\$9.96 billion, passed March 2021 in ARP. Available through September 30, 2026

FY20 ENERGY ASSISTANCE FUNDING & LOW INCOME CREDITS



November 2021 ENERGY ASSISTANCE PROGRAMS

PERMANENT ENERGY ASSISTANCE PROGRAMS

Federal: Low-Income Home Energy Assistance Program (LIHEAP)

Annual appropriation: ~ $162.8M^{1}$ split between the following programs:

- Home Heating Credit: ~ \$60M
 - Application through tax form
 - ✓ Eligibility: 110% Federal Poverty Level (FPL) (based on household size)
- State Emergency Relief: ~ \$61M
 - ✓ Eligibility: 150% of FPL and below
 - ✓ Caps of \$850 for electric and gas each; \$1200 for deliverable fuels²
- Weatherization: ~ \$5.5M
 - Eligibility: 200% of FPL and below (consistent with federal Department of Energy weatherization programs)
 - Distributed through Community Action Agencies
- Assurance 16 or self-sufficiency services: ~ \$6M
 - ✓ Eligibility: 150% of FPL and below
 - ✓ Distributed through the MEAP program by grantees

Apply through <u>MIBridges</u>, <u>211.org</u>, call 211, or in person at a local MDHHS Office

State Programs/Credits

Michigan Energy Assistance Program (MEAP): \$50M

- The goal of MEAP is to help customers move toward self-sufficiency
- Distributed by a grant process to social services agencies across MI. 2021/2022 grant recipients are: The Salvation Army; True North; United Ways of SE Michigan, Jackson County and Barry County; Superior Watershed Partnership; St. Vincent de Paul; THAW; and Bureau of Community Action MDHHS. Grantees distribute to eligible households that have applied for assistance.
- Eligibility: 150% of FPL and below and have received SER
- Caps of \$2000 per household (this could be increased later in the year)
- Assistance can be for any electric, natural gas, or deliverable fuels
- Households either receive one time assistance or can enroll in a 2-year affordable payment plan available to customers of DTE, Consumers Energy, SEMCO, UPPCO, or Great Lakes Energy

² Effective December 1, 2021, the caps will increase to \$1150 for electric and gas each and \$1,500 for deliverable fuels.



¹ While annual appropriations for LIHEAP programs total ~ \$162.6M, the individual line items below represent the funding available for customer assistance. Note that one-time additional funds are allocated to these programs under the American Rescue Plan Act detailed below.

November 2021 ENERGY ASSISTANCE PROGRAMS

Households can receive self-sufficiency services through the LIHEAP Assurance 16

Low-Income Assistance Credit

- Offered by DTE, Consumers Energy, and SEMCO and are approved through the ratemaking process
- Between \$30 and \$40 per month
- Eligibility: 150% and below of FPL

Residential Income Assistance Credit

- Offered by DTE, Consumers Energy, SEMCO, and I&M (Low-Income Service) Provision) and approved through the ratemaking process
- Assistance amount is capped at the monthly service charge, between \$7.50 and \$12.50. Assistance amount changes with adjustments to the monthly service charge in the ratemaking process.
- Eligibility: 150% or and below of FPL

Senior Credit

- Offered by DTE and Consumers Energy
- Assistance amount: \$3.75 per month
- Eligibility: Customers of record, 65 years old and older

FEDERAL COVID ENERGY ASSISTANCE PROGRAMS

LIHEAP American Rescue Plan Act appropriation (ARP Act)

- \$238M proposed to be divided among the following programs:
 - LIHEAP Direct Support
 - Home Heating Credit
 - State Emergency Relief
 - Weatherization
 - Assurance 16
 - Heat & Eat

Application process and eligibility requirements for these programs remain unchanged.



November ENERGY ASSISTANCE 2021 PROGRAMS

COVID Emergency Rental Assistance

- ▶ \$660M plus \$500M from ARP Act³ (10-15% designated for utility bill assistance)
 - In addition to rental assistance, provides assistance for heat, electric, deliverable fuels, water, sewer, and broadband
 - <u>Eligibility: 80% AMI</u> (Area Median Income, income chart in link) and demonstrated COVID related hardship
 - Up to 12 months rental assistance
 - Utility assistance is capped at \$1500 \$2500 for all utilities and is determined based on family size. Cap applies to payment of utility arrearages as well as \$300 - \$500 assistance on a going forward basis.
- Apply through <u>online application portal</u> with assistance delivered through local agencies
- Information regarding total applications received and processed, as well as assistance awarded through this program is available through the MI State Housing Development Authority <u>dashboard</u>.

Federal Homeowners Assistance

- Assistance dollars will be appropriated to the Michigan State Housing Development Authority
- Estimated funding: \$242M⁴
 - Program elements are under development; Goal is to stop foreclosures
 - Priority funding to mortgage, property tax and insurance payments
 - Eligibility: 150% of AMI; Anticipated that 60% of customers will be 60% of AMI
 - Maximum benefit is \$25,000
 - This program has referral materials for all other energy assistance programs.
- Application tools and process will be announced when program is funded.

⁴ These funds have not yet been appropriated by the Michigan Legislature.



³ In total, \$660M has been appropriated by the Michigan Legislature while the remaining \$500M from the ARP Act has not yet been appropriated.