



OFFICE OF CITY MANAGER

City of Farmington Hills

January 5, 2022

Ms. Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 W. Saginaw Highway
Lansing, MI 48917

RE: Case U-20629

Dear Members of the Michigan Public Service Commission,

This letter is in response to your Order seeking public input on case U-20629 and expressing support for the proposed changes to the Service Quality and Reliability Standards for Electric Distribution Systems.

In general, the proposed changes provide a vast improvement in both clarification and effectiveness of the concerns we hear from our residents and businesses. More specifically, the inclusion of new definitions under Part 1 General Provisions to incorporate added conditions and metrics to improve accountability including CELID, CEMI4, Gray sky condition, Momentary interruption and Sustained interruption are greatly welcomed. Additionally, the inclusion of more defined service parameters under Part 2 Unacceptable Levels of Performance further establishes service timelines and thresholds for acceptable service interruptions.

Perhaps most importantly, the changes to Part 4 Financial Incentives and Customer Accommodations are an improvement in addressing the damages resulting from prolonged outages. While the upward increases in the customer accommodation for failure to restore service after sustained interruption due to gray sky and catastrophic conditions are appreciated, they still do not come close to the economic impacts that customers receive from these outages. For example, a customer that loses all their food or medicine that requires refrigeration will not be adequately reimbursed by a \$35 bill credit. Given this reality, both the base rate and hourly charge should both be increased to reflect actual losses sustained by customers. The accommodation over a 96-hour period should reflect a minimum \$100 base rate plus \$5.00 for every additional hour to better compensate for such losses.

Thank you in advance for your time and consideration. The City of Farmington Hills appreciates all efforts to improve the service quality and reliability standards for our electric distribution systems.

Sincerely,

A handwritten signature in black ink that reads "Joseph A. Valentine".

Joseph A. Valentine
Assistant City Manager