



Energy Affordability and Accessibility Collaborative

U-20757 Interim Progress Report

March 17, 2023

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Table of Contents

| | |
|-------------------------------------------------------------------------|-----|
| Executive Summary | vii |
| Introduction..... | 1 |
| Goals | 1 |
| Challenges | 2 |
| Outcomes and Recommendations | 3 |
| COVID-19 Response and On-going Communication..... | 4 |
| Low-Income Energy Policy Board..... | 6 |
| Board Process..... | 6 |
| Outcomes and Recommendations | 9 |
| Outcomes | 9 |
| Recommendations to the Commission | 9 |
| Subcommittees of the EAAC and EWR-LI Workgroups | 10 |
| EAAC..... | 10 |
| EWR-LI..... | 11 |
| General Recommendations to the Commission | 12 |
| EAAC Affordability, Alignment, and Assistance Subcommittee | 13 |
| Committee Process..... | 13 |
| Challenges..... | 14 |
| Outcomes and Recommendations | 15 |
| Outcomes | 15 |
| Recommendations to the Commission | 16 |
| Recommendations for workgroups or agencies outside of the MPSC | 19 |
| Recommendations requiring further analysis and exploration..... | 22 |
| Reviewed suggestions and concepts that are not supported by Staff | 23 |
| EAAC Data Analysis and Regulatory Review Subcommittee | 25 |
| Committee Process..... | 25 |
| Goal/Charge..... | 25 |
| Outcomes and Recommendations | 26 |
| Recommendations to the Commission | 26 |

| | |
|-------------------------------------------------------------------------|----|
| Recommendations for work groups and agencies outside of the MPSC..... | 33 |
| Reviewed suggestions and concepts that are not supported by Staff | 34 |
| EAAC Definitions Subcommittee..... | 38 |
| Committee Process..... | 38 |
| Outcomes and Recommendations | 39 |
| Outcomes | 39 |
| Recommendations to the Commission | 40 |
| EAAC Outreach and Education Subcommittee..... | 40 |
| Committee Process..... | 40 |
| Outcomes and Recommendations | 42 |
| Recommendations to the Commission | 42 |
| Energy Waste Reduction Low-Income Workgroup | 43 |
| Workgroup Process | 43 |
| Health and Safety Subcommittee..... | 45 |
| Workforce Development Subcommittee..... | 46 |
| Outcomes and Recommendations | 47 |
| Recommendations to the Commission | 47 |
| Recommendations for Work Groups/ Agencies Outside of the MPSC | 47 |
| Low-Income Energy Policy Summit | 49 |
| Summit Process..... | 49 |
| Outcomes..... | 56 |
| Collaborative Structure | 57 |
| Low-Income Energy Policy Board | 57 |
| Workgroups..... | 57 |
| EAAC Affordability, Alignment, and Assistance Subcommittee..... | 57 |
| EAAC Data Analysis and Regulatory Review Subcommittee | 58 |
| EAAC Definitions Subcommittee | 59 |
| EAAC Outreach & Education (Ad-Hoc)..... | 59 |
| EAAC Customer Focused Data and Metrics Subcommittee | 60 |
| EWR-LI Health and Safety | 61 |
| EWR-LI Workforce Development..... | 62 |
| Proposed Initiatives..... | 62 |

| | |
|-------------------------------------------------------------|----|
| State Administrative Ad-Hoc Workgroup..... | 62 |
| Voluntary Energy Customer Experience Workgroup..... | 62 |
| Educational Forums..... | 63 |
| Recommendations to the Commission Regarding Structure | 64 |
| Compilation of Outcomes | 66 |
| COVID-19 Response and On-going Communication Efforts | 66 |
| Low-Income Energy Policy Board..... | 66 |
| Affordability, Alignment, and Assistance Subcommittee | 66 |
| Data Analysis and Regulatory Review Subcommittee | 67 |
| Definitions Subcommittee | 67 |
| Outreach and Education Subcommittee..... | 68 |
| Energy Waste Reduction Low-Income Workgroup..... | 68 |
| Low-Income Energy Policy Summit..... | 68 |
| Compilation of Recommendations..... | 70 |
| General Recommendations..... | 70 |
| Subcommittee Recommendations to the Commission..... | 71 |
| Recommendations regarding structure and process..... | 71 |
| Recommendations regarding outreach..... | 71 |
| Recommendations regarding reporting | 72 |
| Recommendations regarding language..... | 73 |
| Additional recommendations..... | 73 |
| Recommendations Requiring Further Work | 73 |
| Recommendations for Groups Outside the MPSC | 74 |
| Administrative and cross-departmental recommendations..... | 74 |
| Recommendations that may require legislative change..... | 74 |
| Recommendation regarding outreach | 74 |
| Conclusion..... | 75 |

| | |
|---------------------------------------------------------------------------|-----|
| Appendices | 76 |
| Appendix A - Index of Acronyms and Abbreviations..... | 76 |
| Appendix B - Index of Webpages | 78 |
| Appendix C – Quarterly Report..... | 80 |
| Appendix D – EAAC DARR Subcommittee Processes and Membership..... | 81 |
| Appendix E – Medical Emergency and Critical Care Data..... | 85 |
| Appendix F – Medical Certification Form: Sample of added protection | 87 |
| Appendix G – Critical Care..... | 88 |
| Consumers Energy | 88 |
| DTE Energy..... | 89 |
| Appendix H – Optional Winter Protection Plan | 90 |
| CE Tariff Electric (same in natural gas)..... | 90 |
| DTE Energy Electric (same in natural gas)..... | 92 |
| Appendix I – Extreme Weather Policy..... | 94 |
| Appendix J – LIEP Board Retreat Workbook Sept. 26, 2022 | 95 |
| Appendix K – LIEP Summit Workbook Nov. 3, 2022..... | 100 |
| Appendix L – Energy Affordability Defined – Companion Document..... | 115 |
| Executive Summary | 115 |
| The Meaning of Healthy..... | 116 |
| The Meaning of Sustainable..... | 117 |
| The Meaning of Energy Efficient..... | 118 |
| METHODOLOGY | 118 |
| Subcommittee Participation..... | 118 |
| Approach to the Task | 119 |
| Subcommittee Process..... | 119 |

Executive Summary

The Michigan Public Service Commission (MPSC or Commission) issued an order on February 18, 2021, in Case No. U-20757 that included a directive for Staff to convene the Energy Affordability and Accessibility Collaborative (EAAC or Collaborative) in coordination with the Energy Waste Reduction Low-Income (EWR-LI) Workgroup. Two concurrent priorities emerged as the Collaborative pursued the goal of reducing the number of households with unsustainable energy burdens. One priority was the immediate COVID-19 response efforts that focused on outreach, education, and program and policy revisions to address immediate needs and reduce barriers. The other priority that emerged was to undergo system analysis and provide recommendations for long term reform targeted toward sustainable affordability, a process for historically marginalized communities to influence policy development, ease of access to services, and the collection of data for protection, safety, and equity.

On February 10, 2022, the Commission issued a subsequent order in Case No. U-20757 adopting several recommendations made by Staff. These recommendations included continuing the EAAC for at least two additional years with future assessment as to the lifespan of the EAAC and adopting a new structure for the EAAC to increase interaction between energy assistance, customer protection, and EWR policy. The recommended structure included an Advisory Committee comprised of EAAC and EWR-LI leadership. Directives from the Commission also included increasing participation of historically marginalized communities in leadership and policy development, working with the Commission's Diversity Equity and Inclusion (DEI) Committee; collaborating with the Governor Whitmer's Poverty Task Force, Council on Climate Solutions, and Council on Future Mobility and Electrification to contribute to cohesive policy across state agencies; and directing investor-owned utilities to continue to file monthly shutoff and arrearage data. The Commission further directed Staff to file an interim report to Case No. U-20757 on progress made and any recommendations no later than December 16, 2022. An extension to March 17, 2023, was granted by the Commission.

This report provides an update on Staff collaborations and communications in response to COVID-19. It summarizes the activities of the EAAC, collaboration with the EWR-LI Workgroup, and revision of the collaborative structure including the formation of an advisory organization known as the Low-income Energy Policy Board (LIEPB or Board). It also details the work undergone by the EWR-LI Workgroup and the EAAC in response to the Commission's directives which included the convening of a Low-Income Energy Policy Summit for the development of collaborative strategies. For each workgroup or subcommittee, outcomes are identified, and recommendations are outlined.

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

that better protects and assists customers would not be possible. Staff would especially like to acknowledge the contributions of Synia Gant-Jordan, Latasha Hannah, and David Covey and to call out the intensive work of the stakeholder subcommittee and LIEPB leaders:

- Affordability, Alignment and Assistance: Kristen Bolds, Society of St. Vincent de Paul (SVDP)
- Data Analysis and Regulatory Review: Kasey Grieco, Superior Watershed; and Rick Bunch, Michigan Municipal Association for Utility Issues (MI-MAUI)
- Definitions: Wende Randall, Kent County Essential Needs Task Force (ENTF)
- EWR-LI Workgroup members
- Health and Safety: Alexis Blizman, Ecology Center
- LIEPB: Andrew McNeally, Upper Peninsula Power Company (UPPCO)
- Outreach and Education: Briana DuBose, EcoWorks; and Briana Parker, Elevate
- Workforce Development: Briana Parker, Elevate

Introduction

No one could have predicted the economic and cultural changes and challenges that Michigan residents would face during the COVID-19 pandemic, the severity or length of the pandemic, or how the pandemic would change how we interact and do business. Many people in our nation also experienced racial and other injustices, viscerally highlighted in the killings of George Floyd, Breonna Taylor, Ahmaud Arbery, and others. The MPSC has responded to these societal challenges in part through collaborative efforts to address the values of safety and equity. Through the inclusion of stakeholders with lived experience and from service and advocacy organizations, the MPSC began assessing and recommending change to the energy assistance systems serving vulnerable residents and impacted communities. Without the commitment of stakeholder leaders and countless hours of dialogue, information exchange and consensus development, the collaborative vision of the Commission could not have progressed.

The MPSC initiated Case No. U-20757 on April 15, 2020, assessing its response to the pandemic and emphasizing the need for special protections for customers to ensure access to utility services and to assist those struggling with utility bills. The Commission issued three additional orders in U-20757, assessing the evolving needs of utility customers as the pandemic continued, and establishing the Energy Affordability and Accessibility Collaborative to look at the energy assistance and customer protection system holistically by using insight gained from the pandemic response to inform system change.

In Case No. U-20757 as well as in rate cases and distribution planning and EWR planning, the Commission focused on moving toward a more fair, equitable, and just system for addressing energy needs. With the assistance of stakeholders, Staff was directed to look at how to decrease the stressful cycle of crisis and utility shutoffs by moving toward a system that supports crisis prevention with consistent, affordable, and accessible energy programs and assistance for Michigan residents in need.

The Commission has also asked for the development of metrics and recommendations of data collection that can support ongoing equitable policy development by better understanding outages, shutoffs, and arrearages. Finally, the Commission requested Staff to consider access to new technologies and clean energy options for impacted communities as strategies are developed.

Goals

The overall goal of the work of the EAAC is to define and ensure energy affordability, accessibility, and security/self-sufficiency in collaboration with the EWR-LI and the LIEPB (its advisory organization) as stated by the Commission through Case No. U-20757.

To build on these directives, the LIEPB set their primary purpose as “guiding the process of assessing energy affordability and accessibility holistically, especially

through linking EWR services and energy assistance programs.” They set as their overarching goal **“to reduce the number of households with unsustainable energy burdens.”** All work of the Board, EAAC, and EWR-LI Workgroup flowed from this purpose and goal.

The Commission has also tasked the EAAC with work regarding equity, definitions, data, metrics, and customer-related rules in various orders. These tasks are not addressed in this report, but the work will be undertaken within the EAAC during 2023. A list of these directives and the committees to which they are assigned are provided in the Collaborative Structure section of this report.

Challenges

Difficulties in ensuring diversity in representation

In the order issued on February 10, 2022, in Case No. U-20757, the Commission stated that “Diversity in representation correlates to diversity of input, experience, knowledge, and ideas that can benefit the EAAC in its mission. As the collaborative works to achieve its goals of defining and ensuring energy affordability, accessibility, and security/self-sufficiency, the direct participation of the communities that experience high energy burdens will be imperative to achieving these goals.”¹

The priority of ensuring diverse representation presented challenges in 2022, though progress has been made. The LIEPB included three members specifically representing their lived experience of energy poverty and their communities. In addition, several board members shared that their passion for work with disadvantaged communities developed out of their own or their families’ experiences with high energy burdens and energy insecurity. The planning committee for the Low-Income Energy Policy Summit also included unaffiliated community members.

Staff reached out to a variety of community groups, advocacy groups and human service agencies for recommendations of possible board members to broaden diversity of representation with limited success. Representatives with lived experience often must take time from work or other responsibilities to participate in boards and collaborative activities. This can be time consuming and expensive for an individual whose work is not in the energy industry. The energy assistance and customer protection systems are complex and confusing and participation in a board or committee that is comprised of professionals can be intimidating. To address this challenge, Staff developed a strategy for increasing diversity of representation which is detailed in this report under the Subcommittee Recommendations to the Commission section.

To broaden input, the Customer Assistance Division and Communications Staff hosted five energy resource fairs and listening sessions which brought insight into the challenges customers face with high energy burdens or energy insecurity, most notably the physical and mental health impacts resulting from an inability to pay

¹ February 10, 2022 order in Case No. U-20757, p. 17

energy bills. These impacts were also apparent in the stakeholder survey on energy affordability conducted by the Definitions Subcommittee (Appendix L) and in the comments of Bethany Stutzman under the Low-Income Energy Policy Summit Panel Discussion.

Addressing the energy assistance and customer protections system holistically

The Commission recognizes that it does not have the legal authority or tools needed to effect system change for energy assistance and EWR or weatherization services delivery. The ability of the EAAC, EWR-LI Workgroup, and the LIEPB to harness the Commission's convening power to bring stakeholders from varied sectors together established a foundation of knowledge about the energy assistance and customer protection system and allowed for development of short-term improvements and initial strategies for system change.

Outcomes and Recommendations

The primary directives from the order issued on February 10, 2022, in Case No. U-20757 were to:

- Develop an EAAC Advisory Committee to enable cross-pollination of policy among the EAAC and the EWR-LI Workgroup. The LIEPB serves as the Advisory Committee.
- Continue the work directed in the order issued on February 18, 2021, in Case No. U-20757. This work continues within the established subcommittees under the direction of the Board.
- Host one to two low-income energy policy summits. The Board hosted a Low-Income Policy Summit on November 3, 2022, followed by virtual reports and feedback sessions on January 17 and 19, 2023.
- Expand diversity of representation in the stakeholder process. Significant effort has gone into expanding representation in stakeholder processes and work continues toward that end.
- Direct the regulated utilities to continue to submit monthly shutoff and arrearage data. Utilities continue to submit this data and recommendations regarding modifications to reporting can be found beginning under recommendation 2.6 – Customer Payment Performance/Shut off Information.

This Staff-directed report provides a description of processes, stakeholder meetings, outcomes, strategies and recommendations. The strategies and recommendations derive from the EAAC and the EWR-LI Workgroup subcommittees, the LIEP Board, and the Low-Income Energy Policy Summit to fulfill these directives.

COVID-19 Response and On-going Communication

Case No. U-20757 is the Commission's response to the coronavirus pandemic. Concerted efforts were made toward communication and collaboration as a result of this international crisis and its particular impact on Michigan. Although COVID-19 and its variants have become endemic and will become part of the fabric of our lives and culture, we recognize that the crisis of the pandemic elicited a response that led to the EAAC, coordination with the EWR-LI Workgroup, and the resultant LIEPB. Due to the pandemic, communication practices were initiated that continue to enhance collaboration toward improving outcomes for low-income energy customers. Since at least 2019, the Commission planned to expand its outreach efforts and has been able to enhance those efforts through the developments from this case.

Staff are actively pursuing opportunities to expand and improve communication and outreach efforts, and this work is informed, in part, by the work of the EAAC and the Commission's customer-focused COVID-19 response efforts. Communications to connect the work of various group and increase the effectiveness of service to low-income customers continue through several avenues:

- The Commission's website² provides data on shutoffs and arrearages.
- The Michigan Energy Assistance Program Workgroup continues to meet monthly and support collaboration between Michigan Energy Assistance Program (MEAP) grantees, utilities, Michigan Department of Health and Human Services (MDHHS), and the Commission.
- Staff continue to report MEAP and EWR updates at the Coalition to Keep Michigan Warm and support the Coalition's connections with MDHHS' and the Michigan State Housing Development Authority's (MSHDA) assistance programs.
- The Customer Assistance Division holds monthly update meetings with Michigan's two largest utilities and quarterly meetings with a group of the utilities most active in the MEAP.
- The Director of the Customer Assistance Division and key Staff also meet regularly with stakeholder advocates to discuss and address concerns.
- The LIEPB connects those with lived experience, the work of stakeholders, and policy experts from multiple state agencies.

In November 2022, the Commission launched www.Michigan.gov/MPSC/GetHelp as a one stop shop for customers and community organizations to learn about available energy assistance, utility shutoff protection programs, and how to apply for assistance. The launch of the webpage was inspired in part from stories shared at the listening sessions by customers who needed help but didn't know where to go to find it. In the first month that the webpage was active, it was the third most visited page on the Commission's website with 2,952 unique page views. It continues

² <https://www.michigan.gov/mpsc/regulatory/reports/other/utility-customer-data>

to be in the top five webpages visited on the Commission's site with more than 1,500 views monthly.

In 2022, the Commission hosted five Energy Assistance Resource Fairs and Listening sessions across the state visiting Gaylord, Benton Harbor, Marquette, Grand Rapids, and Melvindale. During these events, residents had the opportunity to meet with Commission Staff and local and statewide assistance agencies to learn about, and apply for, available energy assistance programs. More than eighty Michigan residents received help. During the listening sessions, residents had the opportunity to share with Commission Staff issues related to energy affordability and accessing energy assistance. The perspectives shared during these listening sessions will help to inform the work of the Commission and Staff on issues of energy affordability.

The Commission continues to explore opportunities for expanding and improving its customer communications efforts and community-based outreach not only related to the availability of energy assistance, but also around energy programs, energy safety, and other issues. Continued relationship building with groups active in the energy assistance space will be critical to that work.

Low-Income Energy Policy Board

Board Process

Introduction and Creation

In response to the COVID-19 pandemic, the Commission issued a call in Case No. U-20757 for ongoing collaboration and communication among stakeholders and utilities to safeguard customers. During 2021, the EAAC worked in coordination with the EWR-LI Workgroup that began in 2018. With its order issued on February 10, 2022, the Commission directed the establishment of an advisory structure to promote cross-pollination of policy and guidance for the work of the EWR-LI and EAAC subcommittees. This advisory committee, comprised of EAAC and EWR-LI leadership, formed the Low-Income Energy Policy Board which convened its first meeting on April 29, 2022. A depiction of the Board's structure can be found in Figure 1.

The responsibilities of the Board were identified as cross-pollination and system coordination. Board members were asked to bring insights and knowledge from their experience and work, and share insights and knowledge from this Board where there is cross-over or synergy with other efforts with which they may be involved. Communication was identified as a key responsibility, and members were encouraged to make connections, raise concerns, and share insights. Decision-making and helping to guide the work of EWR-LI and EAAC subcommittees and consider recommendations to the Commission were communicated as significant responsibilities of the Board. Finally, the Board was charged with planning, sharing ideas and suggestions, and innovation.

Leadership

Leadership of the Board was comprised of EAAC and EWR-LI Staff leaders Anne Armstrong and Brad Banks. Additionally, Andrew McNeally, UPPCO's Energy Efficiency Program Administrator, filled a stakeholder leadership seat due to his role on the EWR-LI steering committee, as well as his cross-over experience with energy assistance at UPPCO.

Membership

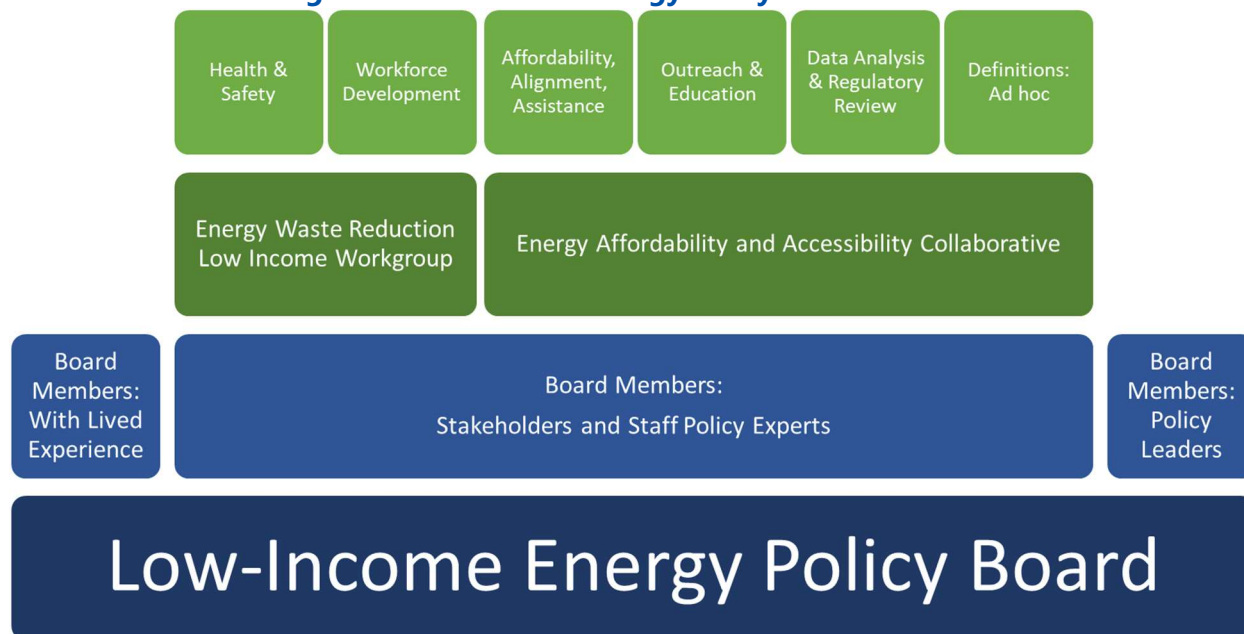
Board membership was centered on eight stakeholders and eight Staff leaders from both the EAAC and the EWR-LI steering committee and subcommittees, as well as the MPSC's Diversity, Equity, and Inclusion Officer. The steering committee and subcommittee leaders were well-positioned to bring key issues and concerns to the attention of this advisory body. Their leadership and experience brought various facets of the assigned work together for coordination and collaboration.

To enhance cross-departmental collaboration and action, state policy leaders were invited to the table. These policy leaders included representatives from the MDHHS; the MSHDA; the Department of Environment, Great Lakes, and Energy ("EGLE"); the Department of Treasury ("Treasury"); the Governor's Poverty Task Force; the Governor's Council on Climate Solutions; and Michigan 211. Representatives from the

Council on Future Mobility and Electrification also supported the efforts of the Board through regular touchpoints with Board leaders.

To ensure that the perspective of the Board was grounded in the day-to-day experiences of low-income households, an effort was and continues to be made to involve those with lived experience of energy poverty on the Board and in Board-sponsored events. Three Board members with lived experience were recruited. One has since resigned but a replacement is being sought.

Figure 1: Low-Income Energy Policy Board Structure



Purpose

When the Board kicked off its journey related to low-income energy policy, it acknowledged the opportunities presented at this particular point in our history and culture. These opportunities included the chance to look at how we keep people safe and connected, to promote equity and justice, to move from crisis to prevention, and to create a system where the majority of households can sustainably pay their bills. By its third meeting in June 2022, the Board affirmed that its primary purpose is to *guide the process of assessing energy affordability and accessibility holistically, especially through linking energy waste reduction services and energy assistance programs*; and its overarching goal is to *reduce the number of households with unsustainable energy burdens*.

Values

To clarify the values underpinning the Board's purpose and overarching goal, Board members participated in a 'values sort' survey. A list of values was collected from the EAAC and various subcommittee agreements and sorted into values around finding solutions, achieving purpose, and foundational behaviors. Top tier values included 82% of respondents selecting Affordability as one of their top three under finding solutions. Inclusion was the next choice in this category at 42%, followed by Home

Energy Security (29%), Healthy Climate (29%), Housing (29%), and Health (29%). Values receiving consensus support under achieving purpose included Measurable Impact (65%) and Action (41%), followed by Collaboration (24%) and Diversity of Representation, Input, Experience, and Knowledge (24%). Foundational behaviors important to Board members were identified as Respect (59%), Transparency (35%) and Integrity (24%). Values were then discussed by the Board and value statements were adopted as follows:

- We value affordability and inclusion in policy actions that create measurable impact.
- We achieve positive outcomes that impact home energy security, health, housing, and a healthy climate.
- We build solutions through collaboration and diversity of representation, input, experience, and knowledge.
- We act with respect, transparency, and integrity.

Policy Pillars

At its June 2022 meeting, the Board identified focus areas or policy pillars derived from the Commission's order on April 15, 2020, in Case No. U-20757. The order directed electric, natural gas, and telecommunications providers under its jurisdiction to complete a number of actions in the following six areas: (1) customer protections and affordability, (2) accounting treatment, (3) regulatory activities, (4) energy assistance coordination, (5) EWR and demand response (DR) continuity, and (6) broadband access and expansion efforts. Customer Centered Engagement and Coordination, Affordability and Customer Protections, and Low-Income Energy Waste Reduction were identified as policy pillars. Level setting presentations were provided for each of these areas in July, August, and October 2022 and the strategy work of the Low-Income Energy Policy Summit focused around these policy pillars.

Goals

In September 2022, the Board engaged in a working session to distill goals from the work of several of the subcommittees. During this in-person retreat style working session, which was facilitated by Jaclyn Badder and Trinidad Pehlivanoglu from the Department of Licensing and Regulatory Affairs (LARA), the Board focused on the Affordability, Alignment, and Assistance (AAA) subcommittee; Data Analysis and Regulatory Review (DARR) subcommittee which included Customer Protections; Health & Safety Deferrals to EWR and Weatherization; and the EWR-LI Workforce Development subcommittee. The Board identified some quick wins and developed goals as noted in the Retreat Workbook attached as Appendix J.

Strategies

On November 3, 2022, the Board hosted an in-person strategy summit to develop specific strategies to address its overarching goal. Strategies were reported and discussed by the Board at a meeting on December 5, 2022. Details regarding this summit are addressed beginning on page 49 of this report.

Outcomes and Recommendations

Outcomes

A group of influential policy and thought leaders has been assembled with a purpose of guiding the process of assessing energy affordability and accessibility holistically, especially through linking energy waste reduction services and energy assistance programs. This group, while continuing to develop cohesion, established its values, developed goals, engaged stakeholders, and identified strategies to accomplish its purpose. Since its inception in April 2022, the LIEPB has been positioned to guide and impact advances in the sustainable affordability of energy for Michigan's low-income customers.

Recommendations to the Commission

As presented to the Board by the Definitions Subcommittee, the Board recommends the following definition of energy affordability to be adopted by the Commission:

"A household has the resources to meet their home energy needs for heating, cooling and other uses in a healthy, sustainable, and energy-efficient manner without compromising a household's ability to meet other basic needs."

Subcommittees of the EAAC and EWR-LI Workgroups

EAAC

Subcommittees of the EAAC derived their direction and goals from charges issued by the Commission and were co-led by stakeholders and Staff. Each of the subcommittees had diverse participation with representatives from various community organizations including anti-poverty advocates and service agencies, utilities, regulators, policymakers, energy contractors, state and local government employees, researchers/evaluators, as well as impacted/interested community members. Figure 2 is a summary of assigned Commission charges, leaders, and input methods for each of the subcommittees.

Figure 2: Subcommittees of the EAAC
Commission Charge, Leadership and Input Methods

| Charge | Leadership | Start Date | Participation | Input Methods |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Affordability, Alignment, and Assistance | | | | |
| <ul style="list-style-type: none"> Streamline existing energy assistance programs and make them more accessible. Research next generation affordable payment plans. Analyze collections processes and disconnections. Integrate w/ EWR, weatherization, & rate design. | <ul style="list-style-type: none"> Kristen Bolds, SVDP Elaina Braunschweig, MPSC-RATS Jamie Curtis, MPSC-CAD | 8/12/2021 | 30-40 | Results obtained from MPSC listening sessions, anonymous surveys, open dialogue, previous Google Doc, emails, and the exploration of other virtual collaboration tools. |
| Data Analysis and Regulatory Review | | | | |
| <ul style="list-style-type: none"> Develop a long-term data collection strategy. Review existing customer protections. The focus is separated into two parts: Data analysis and regulatory review of the Consumer Standards and Billing Practices for Electric and Natural Gas Service. | <ul style="list-style-type: none"> Rick Bunch, MI-MAUI Kasey McNeally, Superior Watershed Christine Forist, MPSC-CAD Jake Thelen, MPSC-CAD | 3/15/2022 | 30 – 40 | Participant feedback from sharing ideas, opinions, concerns, etc. during the public meeting via voice or chat, the suggestion box, committee member survey responses, and contacts of lead stakeholders. |

| Definitions | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|---------|------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> Establish common definition of energy security/self-sufficiency – begin with proposed definition by MEAP Workgroup Subcommittee 2. Develop proposal for an energy affordability standard and how the standard can be integrated into the regulatory environment. Draft suggested requirements for consistent energy affordability-related information for utilities to submit to appropriate case dockets: rate cases, IRP cases, EWR cases. | <ul style="list-style-type: none"> Wende Randall, Kent Co. Essential Needs Task Force Mary Wilkins, MPSC-CAD | 8/24/2022 | 10 – 15 | Participant feedback from discussions within committee meetings, invitations to submit email comments, and committee member surveys. |
| Outreach and Education | | | | |
| <ul style="list-style-type: none"> Establish regular mechanism for stakeholders to provide input on improving communications and materials. Broaden outreach to groups traditionally not a part of utility communications. Improve the dissemination of energy assistance information to difficult to reach customers. | <ul style="list-style-type: none"> Briana DuBose, EcoWorks Detroit Briana Parker, Elevate Reka Holley-Voelker, MPSC-Communications Section Mary Wilkins, MPSC-CAD | 9/9/2021 | 25 – 35 | Results obtained from workgroup breakout groups, discussion during committee meetings, invitation to submit E-mail responses, and MPSC listening sessions. |

EWR-LI

The EWR-LI, initiated at the request of stakeholders in 2018, formed subcommittees in response to stakeholder interest and stakeholder leadership. There was also a diversity of participation and robust discussion among these subcommittees. Based on presenting needs, in 2022 work was focused under two subcommittees: Workforce Development, and Health and Safety with a focus on deferral mitigation.

Figure 3 depicts the subcommittees and their corresponding workgroups.

Figure 3: Subcommittees of the Energy Waste Reduction Low-Income Workgroup and the Energy Affordability and Accessibility Collaborative



General Recommendations to the Commission

Recommendation 0.1 – Recommendation to extend the timeline of the EAAC. The Commission’s directives in Case Nos. U-20940 and U-20697 for the EAAC to evaluate and make recommendations regarding Percentage of Income Payment Plans (PIPPs) requires more time by the EAAC than provided in the order issued on February 10, 2022 in Case No. U-20757, where the Commission agreed that it would be necessary for the collaborative “to continue into 2023, with assessment in the future as to the collaborative’s lifespan.” Staff recommends an extension of the EAAC and work of the LIEPB to continue through calendar year 2024 with re-assessment for work beyond that time.

Recommendation 0.2 – Role of the LIEPB

Considering the upcoming MEAP sunset and conversations regarding system changes at the Low-Income Energy Policy Summit, there is a recognition that the LIEPB plays an important role in informing system change. The months of work by dedicated stakeholders to this collaboration are critical in developing consensus and in understanding the nuances in policy decisions. Therefore, Staff recommends that (1) the LIEPB and associated workgroups serve as an avenue for vetting low-income policy issues and ensuring that the goals of reducing the number of households with unsustainable energy burdens and moving from crisis response to prevention are managed collaboratively; and (2) energy assistance and low-income EWR related legislative efforts consider the collaborative work of the Board.

The outcomes and recommendations of each of the EAAC subcommittees and of the EWR-LI are shared in the sections that follow.

EAAC Affordability, Alignment, and Assistance Subcommittee

Committee Process

Since the Affordability, Alignment, and Assistance Subcommittee (AAA) report was completed in November 2021, subcommittee leaders used guidance from a progress survey sent to AAA members in January 2022, along with the Commission charge from Order No. U-20757 to determine the subcommittee's direction and activities for 2022. The AAA Subcommittee continued to educate its members on the customer application and enrollment journey through the low-income energy assistance system, and collected and organized goals, recommendations, and data.

From November 2021 to February 2022, education included a presentation by a contractor from the MDHHS Michigan Bridges (MI-Bridges)³ system on the MDHHS assistance application process, discussion on EWR referrals, and an overview of the MEAP grantee energy assistance processes.

From February to May 2022, the AAA Subcommittee leaders created and utilized an ad-hoc sub-group to address the existing hurdles between energy assistance and EWR referrals/services—as set out in the AAA subcommittee charge. The group was comprised of utilities, MEAP grantees, and EWR advocates and discussed best practices and struggles including MEAP/utility communication and coordination, information technology deficiencies, and data privacy concerns. This ad-hoc EWR group discovered many areas which needed improvement in the assistance to EWR referral process. This work mostly fulfilled the integration with EWR required by the AAA Subcommittee charge set by the Commission—with some remaining work to be done to determine how to implement desired improvements.

From March to May 2022 in the regular AAA Subcommittee meetings, Staff began to collect and organize AAA member goals and recommendations to improve upon the existing customer journey. Subcommittee members were asked to provide feedback based on the education the group had received on various topics, as well as stories shared by utilities and MEAP grantees on the struggles they and their customers might experience when engaging in the assistance landscape.

Based on the January 2022 progress survey, the AAA also recognized it would be important to analyze the effectiveness of the current energy assistance programs more quantitatively.

³ MI-Bridges is an MDHHS portal that connects customers to many of the state's assistance applications and services. https://newmibridges.michigan.gov/s/jsd-landing-page?language=en_US

In May and June 2022, the AAA Subcommittee discussed different data points that could reveal energy assistance program effectiveness. With the complexity of deciding what data would determine effectiveness, subcommittee leaders settled on collecting crisis cycling data.⁴ These data points were collected in hopes that the subcommittee could demonstrate if energy assistance needs were being addressed by showing trends in late payments and the receipt of shutoff notices in the months following the receipt of assistance.

From June through October 2022, with input from AAA members, subcommittee leaders developed a goals matrix and data tracking mechanism while collecting data and further recommendations for improving the customer journey. The goals matrix was created as a tool to help the subcommittee develop recommendations. Using this tool, the group could more clearly distinguish how prudent a recommendation is, the difficulty and barriers of instituting the change, which organization was responsible for the change, and what positive and negative impacts resulted from the recommendation.

Alternatively, the data tracking mechanism helped the group to determine the goal of the data, who provides the data, if the data collection is prudent for Commission use, the granularity of the data (by zip code, by month, etc.), if the data is shareable, if the data is a one-time request, and if there is an administrative burden to collect the data. These categories helped Staff determine the reasonableness of instituting a recommendation or collecting types of data.

The AAA is not yet ready to present the effectiveness of energy assistance programs to the Commission due to the premature nature of the data analysis. However, based on the customer journey work accomplished by the subcommittee since the last report, the AAA is prepared to release its list of recommendations that are anecdotally supported as problem areas and process improvements in the energy assistance application process—as outlined below.

Challenges

At the beginning of 2022, the AAA subcommittee leaders received member feedback indicating some discontent with the speed of progress in the subcommittee and the lack of addressing affordability. The leaders believed, however, that in order to fulfill the Commission's charge for the AAA subcommittee, it made the most sense to start by educating its members on the current energy assistance landscape to accomplish streamlining and make current energy assistance programs more accessible—the first part of the subcommittee's charge. Subcommittee leaders believed that with that knowledge and subsequent improvement recommendations as a foundation, the subcommittee would be better able to address energy affordability.

⁴ Crisis cycling is unofficially defined by the AAA subcommittee for data collection purposes as a process in which a customer reapplies for crisis assistance or receives late payment/shutoff notices after receiving assistance.

Going forward, subcommittee leaders aimed to continue to send out progress surveys each time an element of the subcommittee charge had been addressed to ensure members continue to guide the direction of the subcommittee.

In October and November of 2022, AAA subcommittee leaders once again gauged the subcommittee's progress with a survey and discovered many members believed the subcommittee's work on streamlining and making more accessible current energy assistance was not yet complete. When members were asked to explain their responses and expand upon how the work was not complete or what additional information was needed, new information was not gained.

Some survey responses indicated discontent with goals already recorded in the goals matrix—desiring legislative change. Subcommittee leaders also realized from this survey that the current charge of the subcommittee did not include desires to address energy affordability mentioned at the start of 2022 and discussed later in this report.

The subcommittee faced some contention surrounding the recommendations mentioned later in this report. Some members communicated that they felt they did not have sufficient time to fully review the recommendations. However, process expectations were routinely communicated in each meeting for transparency. Most recommendations were developed by members of the subcommittee from February through May 2022 during the open meetings and in the ad-hoc EWR group which were then presented in the broader meetings, as well as logged as part of the data and goals tracking spreadsheet. Furthermore, subcommittee leaders notified members each month that meeting goals/recommendations tracking, PowerPoint presentations, and recordings were all available and up to date on the webpage. Strong concerns were not voiced prior to the circulation and review of the recommendations.

Committee leaders were also guided to bring all member recommendations and corresponding concerns voiced by the subcommittee to the LIEPB, which influenced the presentation of recommendations in this report.

Outcomes and Recommendations

Outcomes

Besides customer journey recommendations, the greatest accomplishment of the AAA subcommittee has been education. Subcommittee leaders were able to secure presenters to educate members on most aspects and programs in the energy assistance landscape, which led to the assembly of a document that diagrams how customers apply for and are referred through the energy assistance process from the perspectives of MDHHS, MEAP grantees, and utilities.⁵ Also included in the document is a detailed description of the energy assistance options with useful tables that break down program requirements by income level or whether or not a customer must be in crisis to receive the assistance. The organization of information

⁵ The "Low Income Customer Journey" document can be found and downloaded from the AAA Subcommittee [website](#).

helped subcommittee members visualize the complexities of energy assistance. This was especially helpful for members who were not as familiar with the process and helped to level set the group's knowledge base to facilitate more informed decisions.

Recommendations to the Commission

Staff offers the following recommendations to the Commission and LIEPB due to their anecdotal support expressed in AAA subcommittee meetings, alignment with goals of the AAA program analysis rubric incorporating the subcommittee's guiding statement and principles, as well as a negligible ratepayer impact.⁶ The subcommittee's guiding statement and principles are as follows:

End the crisis-assistance-crisis cycle by centering energy affordability and facilitating customers to sustainably afford 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.

Recommendation 1.1 - Staff requests an updated charge from the Commission

The charge of the AAA Subcommittee 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 (APPs), analyzing collections processes, integration with EWR and weatherization, and rate design.

In light of Staff proposing an updated structure for the work of the EAAC and LIEPB next year (page 57), the AAA subcommittee leaders request an updated charge that may reflect potentially unaccomplished work from the original charge, newly identified topics, and/or work proposed to be addressed by the AAA subcommittee in the updated EAAC structure.

The AAA subcommittee largely accomplished its goal of analyzing the streamlining and making current energy assistance more accessible—with plans to wrap up the work by receiving more customer feedback from MEAP grantee customer surveys and advice from customers participating in the Commission's listening sessions.

⁶ The program analysis rubric, found in the Goals and Data Tracking document on the AAA Subcommittee [website](#), was developed out of the subcommittee's adoption of guiding statement and principles in the 9/9/2021 subcommittee meeting.

While the subcommittee has not addressed every aspect of the Commission's charge, below are the reasons why Staff requests an updated charge:

- On the charge to research next generation APPs: Staff recognizes that the utilities are currently piloting industry-recommended payment plans—the PIPP and Staff work to adhere to a new, standardized MEAP APP across participating utilities. It is Staff's recommendation to not interfere with efforts that are currently underway at the Commission and within the State MEAP Team. Staff instead proposes monitoring and analyzing the efficacy of the PIPPs once they are complete—as identified in the proposed subcommittee structure.
- On the charge to integrate with EWR and weatherization with the input and assistance of EWR Staff: The AAA subcommittee is recommending ways to improve EWR referrals and services for energy assistance recipients. However, having likely explored the extent of that connection, Staff proposes that the majority of EWR topics are not best addressed within the AAA, but rather by the experts involved in the Commission's EWR-LI Workgroup. If the Commission desires further exploration of the EWR and energy assistance connection, Staff requests clarification on what additional aspects of the connection should be explored.
- On the charges to analyze collections processes and integrate rate design: Based on the October 2022 progress survey, integration with rate design and analyzing collections processes are not high priority topics for AAA members. However, if the Commission would like these issues addressed by this subcommittee, Staff requests clarification on those two issues explaining what the Commission would like analyzed. Finally, based on the explanation above, Staff requests a refined or revamped charge for the AAA subcommittee to guide its work in 2023. Many changes have occurred in the world, the State, and the Commission since the charge was originally ordered. The subcommittee wants to ensure that it is addressing pertinent, relevant issues that concern customers as well as the Commission.

[Member Dissent to Recommendation 1.1](#)

The members of the AAA subcommittee have varying goals and have already expressed a desire to continue work on streamlining and making current energy assistance more accessible rather than moving on to address other topics. However, Staff recorded all recommendations relating to this part of the charge from the members and is proposing the most viable recommendations to the Commission. Staff recognizes that not all recommendations can be accomplished by the LIEPB or Commission and may need to be pursued outside of the EAAC. This may have led to members feeling like this part of the charge is not yet complete. However, if additional issues with streamlining current energy assistance are discovered in the AAA subcommittee in the future, Staff can be sure to raise those issues to the Board and the Commission.

Recommendation 1.2 - EWR outreach and referral for self-attested Residential Income Assistance Credit (RIA) customers

Staff recommends to the Commission that customers who self-attest to RIA receive an EWR referral and are treated the same way by their utility as State Emergency Relief (SER) and Home Heating Credit (HHC) recipients in terms of outreach and services offered where applicable. This will ensure that customers can have both their assistance and efficiency needs met. This recommendation was developed in the AAA subcommittee/EWR ad-hoc meetings and shared in the general AAA subcommittee meetings when it was discovered that some utilities did not perform this outreach and referral.

Recommendation 1.3 - Consistent advertisement of RIA and assistance offerings on utility websites

The AAA subcommittee recommends the Commission issue an order for all regulated utilities to work with Staff to advertise the RIA along with other assistance offerings on their websites in a similar and consistent fashion with similar content, links, and instructions on how to apply—including a link to the MPSC assistance webpage—in order to make finding and applying for assistance options more accessible and consistent.

Recommendation 1.4 - Outreach to previous assistance recipients

Staff requests that the Commission stress the importance of MEAP grantees and utilities reaching out to past SER, HHC, and utility credit recipients to instruct them on how to apply for assistance if needed and notify those customers that there are monthly utility assistance credits available for those who qualify. Regular, ongoing assistance can prevent crisis by creating a more affordable monthly energy bill.

Member Dissent to Recommendation 1.4

Large utilities voiced in AAA subcommittee meeting discussions that they already performed such outreach as mentioned above; however, utilities also expressed concern about the administrative burden of such outreach.

Recommendation 1.5 - Uniform Low-Income Assistance Credit (LIA) reporting

Staff recommends the Commission order utilities with an LIA credit (DTE Gas, Consumers Energy Electric and Gas, SEMCO Energy Gas Company, and Michigan Gas Utilities) to file the same LIA report as DTE Electric was ordered to do in the U-20836 rate case so that the LIA credit distribution can be assessed on a macro level and attempts can be made to align credit distribution policies across utilities.

Recommendation 1.6 - Clarification on equity and impacted communities

At the inception of the AAA subcommittee in August-September 2021, members desired energy assistance programs to center impacted communities where possible. Staff seeks the following clarification from the Commission regarding the use of equity and centering impacted communities in energy assistance programs and analysis:

- Should Staff, the EAAC, and LIEPB focus more on impacted communities or equity in energy assistance programs as referenced in Case No. U-20836?
 - Equity examples could include prioritizing those with higher arrears, those unable to qualify for other assistance, those with medical needs, or other groups the Commission proposes; or it could align with the federal Low-Income Home Energy Assistance Program (LIHEAP) priorities which include households with young children, disabled members, and seniors.
 - How should “community” be defined and how should Staff identify if a community is “impacted?”
 - Examples include but are not limited to: MI EJ Screen Tool, census tract, or zip code
 - How would the Commission prioritize one community over another?

Recommendations for workgroups or agencies outside of the MPSC

Recommendation 1.7 - Improve MEAP/utility communication for EWR referrals

There is a communication issue from MEAP grantees when directing EWR referrals to the correct utility or contractor. Training is recommended to collect as much information about an appliance or other EWR need as possible, potentially with a questionnaire checklist, so the referral is made correctly. Improving this process could lead to a more streamlined and efficient customer experience.

Recommendation 1.8 - Redefine crisis for energy assistance programs (LIHEAP & MEAP)

Per the DARR Subcommittee recommendation 2.10 (page 31), Staff is recommending that the Commission allow Staff to work directly with MDHHS on the process of determining how critical care customers can receive assistance.⁷ Staff needs to develop a clearer understanding of how MDHHS works with critical care customer needs. Through this collaboration, the group will aim to create a procedure that will allow eligible critical care customers to receive energy assistance while retaining the critical care designation.

One opportunity Staff supports is redefining crisis for energy assistance programs (LIHEAP & MEAP) to include income eligible critical care or medical hold customers with accruing arrears. This change would prevent customers who meet LIHEAP and MEAP income qualifications and are on shutoff holds from accruing unmanageable arrears (supported by data collected by the DARR subcommittee). An additional change could also assist those customers with documented EWR projects that are deferred due to health and safety related home repairs whose usage is unmanageable and to whom services to address usage have been delayed.

⁷ A Critical Care customer or household can receive protection from disconnection or have services restored due to inability to pay if there is an identified Critical Care customer in the home and interruption of service would be immediately life threatening. To remain on the protection, a customer is required to submit an updated Medical Certification Form to their utility at each anniversary.

Recommendation 1.9 - Consider HHC approval for MEAP eligibility

Currently, LIHEAP SER income validation and a crisis in the form of a past due notice are the only qualifiers to receive MEAP. Considering categorical income eligibility for MEAP to include those approved for LIHEAP Heating Assistance and the HHC would increase the accessibility of useful assistance services. Legislative updates to allow HHC recipients to qualify for MEAP without a past due notice would help keep customers out of crisis and further promote self-sufficiency. In particular, senior citizens and others who are payment conscious would be able to receive much needed assistance without necessitating an account delinquency. These legislative changes are outside of the purview of the LIEPB and Commission but should be noted as possibilities.

Staff acknowledges that expanding eligibility to energy assistance programs adds additional strain on already limited energy assistance funding.

Recommendation 1.10 - Eliminate energy co-pays or re-work interdependency in co-pays in the SER application

As discussed in both the DARR subcommittee recommendation 2.12 (page 34) and AAA subcommittee, Staff recommends that MDHHS either eliminate energy co-pays or re-work interdependency in co-pays in the SER application so that energy co-pays used for utility and MEAP assistance do not require non-energy co-payments (i.e., water, windows, etc.) to proceed with energy assistance. Current co-payment policies can require customers to wait 30 days for their SER to expire before they can reapply for specific energy assistance, excluding the non-energy service from their request since they cannot make that co-payment. If this recommendation is accepted, MEAP grantees or utilities will be able to assist customers with energy co-payments and perform necessary services.

Recommendation 1.11 - Streamline and make more accessible energy assistance applications

The AAA subcommittee brainstormed several ways to improve energy assistance applications in the MI-Bridges platform; ideally, there would be a single application in MI-Bridges for all energy assistance needs (SER, HHC, and utility credits/assistance).

- When MDHHS provides utilities with a list of SER/HHC recipients, it is recommended they provide a second list of confirmed income-qualified customers ($\leq 150\%$ Federal Poverty Level) who were denied SER for non-income reasons and then refer those customers to MEAP grantees.
- Since it is not always clear why a customer has been denied SER, it is recommended that MDHHS/MI-Bridges add a standardized utility self-attestation form to the end of Medicaid, Supplemental Nutrition Assistance Program ("SNAP"), and SER applications - or after the approval stage for those applications. This would facilitate a more automatic RIA enrollment for eligible recipients of Medicaid and SNAP and allow for those customers who may be approved for SER

(or are income-qualified) but did not receive a payment, and therefore do not appear in utility systems as income-qualified.

- It is recommended the HHC application be added to the SER application.
- It is recommended MI-Bridges have a more specialized resource site containing information about what to do after an SER denial based on the reason for the customer's denial; this will allow customers to be connected to the most useful services and have their needs more accurately addressed. It is also recommended to ensure that a MEAP grantee referral is one option available on the resource site, as MEAP grantees are most experienced with customers' needs in this area—especially in the case a customer requires assistance making an SER co-payment.
- Communication and tracking of the approval stage of an SER application with additional granularity is recommended. If an appointment with a MDHHS caseworker is required, allow the customer to choose their appointment time; currently, appointments are assigned to customers and they may not be scheduled at a convenient time for those customers, causing appointments to be missed. Increased communication and application tracking ability could greatly reduce the burden for Staff and customers since customers would not need to call to check on their application progress as frequently. This, in turn, could also help to increase customer and Staff (MDHHS/MEAP) satisfaction.
- It is recommended to speed up the SER interview scheduling process and more clearly communicate scheduling at the time of application, as well as give customers the ability to select their preferred appointment time and date using an online scheduler.

The stated modifications would increase accessibility of utility assistance by consolidating all assistance applications within the MI-Bridges platform. With increased accessibility, customers could receive more assistance, thus preventing them from cycling through crisis. The recommendation to incorporate the HHC application into the MI-Bridges process was also included in the [2022 Poverty Task Force Report](#) released in June 2022 by the Governor's Poverty Task Force.⁸

[Member Dissent/Hurdles to Recommendation 1.11](#)

There are large hurdles to prioritize improvements to energy assistance in MDHHS, even though it is the most sought-after and searched type of assistance on the MI-Bridges portal. MDHHS is challenged with capacity issues for verifying income for utility applications for assistance other than SER.

[Recommendation 1.12 - Provide additional outreach to assistance customers so they are aware of utility credits that may be available to them](#)

It is recommended that MEAP grantees convey to a customer at the time of application that they should receive the RIA for the 12 months following receiving

⁸ Additional information on the Poverty Task Force's policy recommendations can be found on the Department of [Labor and Economic Opportunity's Poverty Task Force website](#).

SER or HHC and inform them that they may have to renew that credit after the initial 12 months has elapsed.

Member Dissent to Recommendation 1.12

Utilities voiced concerns about more broadly communicating this information due to the lack of capacity to process the self-attestation forms in the years a customer is not automatically enrolled to receive SER. It is therefore recommended that this topic is explored further by MEAP grantees and utilities in order to reach a mutually beneficial outcome.

Recommendation 1.13 - Offer option for virtual energy assessment

If a customer refuses someone entering their home, it is recommended that MEAP grantees offer such customers a utility company virtual energy assessment (Consumers Energy, DTE, UPPCO).

Member Dissent to Recommendation 1.13

Utilities and grantees indicated that in-person audits are recognized as preferred and superior.

Recommendation 1.14 - Facilitate inter-agency coordination to assist customers with old bills or no billing history to obtain housing and new utilities at a new address

Facilitate inter-agency coordination to assist those customers with old bills or no billing history to obtain housing and new utilities at a new address by considering a client—not a concurrent customer—eligible for assistance with establishing service, per a documented referral from the Housing Assessment and Resource Agency (“HARA” – per MSHDA criteria).

Member Dissent to Recommendation 1.14

The prevalence of this issue may not be widespread.

Recommendation 1.15 - Incorporate more flexibility in assistance programs for customers with higher usage and arrears

These customers do not qualify for MEAP APPs due to costs associated with their needs. The MEAP workgroup is creating a subcommittee to work on this issue, specifically as it relates to the MEAP APPs.

Recommendations requiring further analysis and exploration

The below recommendations are more contested by utilities, primarily due to the cost and perceived effort required to institute them. However, in Staff’s opinion, the cost and effort could be justifiable due to the resulting benefits. Staff does not support increases in cost without a necessary benefit, since increasing costs would likely decrease energy affordability. Staff also notes general utility dissent toward EWR-related recommendations, since many utilities use third-party EWR administrators or contractors, which could create hurdles in tracking and communication. Because of the issues outlined above, Staff recommends that the below recommendations undergo further analysis by more appropriate organizations or workgroups (e.g., EWR issues addressed by the EWR-LI Workgroup

or EWR Staff) and that recommendations pertaining to utility spending be subject to utilities proposing cost estimates for the needed upgrades—in order for Staff to provide more substantive cost-benefit analysis.

Recommendation 1.16 - Provide additional training to frontline staff to better understand the impacts of EWR on affordability

Train caseworkers and customer service representatives to understand the benefits of EWR. One of several possibilities includes providing opportunities for caseworkers and customer service representatives to shadow a home energy assessment performed on their own home. The caseworkers or customer service representative would then be able to articulate expectations of the assessment. Additional training could lead to better case management and higher uptake in home energy assessments and EWR referrals, as demonstrated by utility and non-profit partnership experience in the Upper Peninsula.

Recommendation 1.17 - Central platform for scheduling, logging, and tracking EWR referrals

A central platform (potentially built on existing agency portals or access to “MI Bridges”) would be useful for utilities and MEAP grantees. A portal could allow EWR contractors to offer virtual scheduling and subsequently log EWR referrals and services. This sharing would, in turn, reduce necessary resources while increasing accessibility and uptake in EWR service scheduling. Additionally, it would be beneficial for utilities and MEAP grantees to track EWR referrals, and contractors to notate whether, when, and what type(s) of EWR services were performed on each referred case.

Member Dissent to Recommendation 1.17

Utilities are concerned that tracking and IT system upgrades could be very costly and result in an unquantified benefit. EWR advocates, however, desire large-scale data collection. Additionally, EWR services are performed by several organizations and servicers, which makes tracking difficult, especially while balancing data privacy. Staff has been informed that utilities using EWR contractors (such as CLEAResult) already receive EWR service tracking reports; however, when requested, utilities did not provide the data.⁹

Reviewed suggestions and concepts that are not supported by Staff

The below suggestions and concepts were discussed by Staff and the subcommittee but for the reasons outlined below are not being recommended by the Staff at this time:

⁹ Staff requested the customer counts for customers who received EWR referrals vs. services performed—not personal identifiable information. Data was not provided on the grounds of privacy/access concerns.

1.A. Suggesting an equity framework for prioritization of underserved customers receiving the LIA credit.

- i. Given these ongoing efforts, the Commission finds that the work necessary to define equity and related terms as well as establish metrics for the energy infrastructure would be appropriate in the EAAC and its subcommittees. This issue is present in Case No. U-20836, the DTE electric rate case, and will be handled according to the November 18, 2022 Commission Order in that case.

1.B. Ideally, MEAP grantees and utilities would schedule EWR services for customers in crisis in the initial phone call with a customer.

- i. This issue is highly contested. Some case managers at MEAP grantees believe scheduling a referral when first making contact with a customer is helpful, while others believe resolving the crisis at-hand first is more successful. An online scheduling tool, as proposed in recommendation 1.17, would support either approach.

1.C. Potentially notify 2-1-1 and/or MEAP grantees of availability of RIA credit and facilitate a pathway for non-SER and non-HHC recipients to apply for that credit in a way that is not burdensome.

- i. This is a highly contested recommendation with concerns that if the RIA becomes too well-known, either MDHHS, MEAP grantees, or utilities could potentially have to increase capacity to perform enrollment, thus needing to increase personnel costs. Further, smaller utilities do not have the large rate base and revenue on which to allocate large RIA enrollment costs, which decreases rate affordability further.
- ii. Additional concerns include abuse of the system since self-attestation does not require proof of income.
- iii. How can we balance these concerns while still maintaining access to energy assistance? One suggestion is to add utility self-attestation forms to MI-Bridges applications to automate the enrollment process more fully.
- iv. Recommendation 1.11, to streamline and make more accessible energy assistance applications, is a compromise that Staff and some MDHHS partners have considered. It would increase accessibility while decreasing administrative burden.

1.D. Changing the term "home energy assessment" to "energy insight report" or "home energy savings opportunities report" to make the assessment less intimidating for customers to increase uptake.

- i. Consumers Energy piloted the "energy insight report" terminology but did not notice increased uptake in scheduling or interest, making this change likely unnecessary.

- ii. Rebranding marketing materials and training frontline staff to change terminology is costly and without a perceived benefit. Staff does not support increasing rates for additional pilots or marketing changes.

1.E. Aligning and expanding income eligibility of assistance programs

- i. These would require legislative change.
- ii. Expanding income eligibility is difficult because there is not currently enough funding available to assist all households that are currently income-eligible. Adding additional households to this eligibility group may skew assistance to households with higher incomes.

EAAC Data Analysis and Regulatory Review Subcommittee

Committee Process

Goal/Charge

The goal of the Data Analysis & Regulatory Review subcommittee (DARR) was to review the monthly utility customer payment data collected in Case No. U-20757 and the Quarterly Report as described in the MPSC's Consumer Standards and Billing Practices for Electric and Natural Gas Service (Billing Rules), examine and discuss a long-term data collection strategy, and ensure that this data collection is working in concert with the Commission's direction on data collection and privacy through the MI Power Grid Customer Education and Participation Workgroup from Case No. U-20959.

The U-20757 Report¹⁰ originated from the Commission's COVID-19 response order on April 15, 2020. This data was used to monitor the number of residential customers in the State who were without utility service, the number of homes where service was restored, and the number of shutoff notices sent. It directed utilities to submit data biweekly. The Commission worked informally with the utilities to report arrearage data beginning in June and the order was updated on July 23, 2020, to include the arrearage data and to change the cadence of the data submission from biweekly to monthly. This information can be viewed in Case No. U-20757 or <https://www.michigan.gov/mpsc/regulatory/reports/other/utility-customer-data>.

The Quarterly Report (Appendix C) is detailed in the Billing Rules, R 460.151. This report includes account payment performance, number and description of complaints registered with the utility, number of shutoff notices issued by the utility and the reasons for the notices, number of hearings held by the utility, number of written settlement agreements entered into by the utility, number of service

¹⁰ U-20757 Report Template, https://www.michigan.gov/-/media/Project/Websites/mpsc/regulatory/reports/U-20757_Data_Template_and_Definitions.pdf

disconnections, and number of reconnections. This report includes both residential and small commercial customers. The information is submitted to Case No. U-18120 on a quarterly basis.

Part 7 of the Billing Rules focuses on customer protections, R 460.128 - R 460.134. The Commission requires all regulated electric and natural gas utilities to follow the Billing Rules. This rule set outlines protections for both the customer and utility. Specifically, the protections prevent an account from being disconnected or shutoff during the timeframe specified in the rules. The account balance will continue to accrue while the account is protected, and payment is still expected.

Outcomes and Recommendations

Throughout the DARR journey key elements were identified directly through participation, the survey, comments, and data collection. DARR looked at two reports, the U-20757 Report and the Quarterly Report detailed in the Billing Rules, R 460.151. Staff moves the following recommendations to the Commission.

Recommendations to the Commission

Recommendation 2.1 - Report Format and Cadence

Combine the U-20757 Report and Quarterly Report. These reports reference many similar or duplicative data metrics. Currently, the U-20757 Report is submitted to the Commission on a monthly basis while the Quarterly Report is submitted quarterly.

Staff recommends that data be submitted quarterly but broken down by month and be submitted as it currently appears in the Quarterly Report by residential and non-residential customers classes where applicable. If an emergent need for data arises the Commission can ask for utilities to report data on a more frequent basis. The U-20757 Report is an example with reporting started as biweekly then changed to a monthly cadence in response to the COVID-19 pandemic.

Recommendation 2.2 - Customer Payment Performance Information

Staff recommends that utilities report arrearage data in the delinquency category that the balance accrued and that the Commission add an additional arrearage category to the reporting template for arrearage amounts that are being written off.

Currently, the Commission is obtaining customer arrearage data in the following delinquency categories: 6-30 days delinquent, 31-60 days delinquent, 61-90 days delinquent, and 91+ days delinquent. The current reporting format is confusing because customers can carry a delinquent balance that can stretch across multiple categories. Utilities are currently reporting total arrearages in the oldest category. This does not give a true picture of how high arrearages are in each category. Staff recommends that utilities report arrearages in the category in which the arrearage occurred. For example, a customer has \$1,000 in arrearages and \$100 falls in the 6-30 days category, \$300 falls in the 31-60 days category, \$400 is in the 61-90 days category and \$200 is in the 91+ days category. It is recommended that on the data report, the customer would be counted in the 91+ days category but the arrearage

amounts would be reported in the delinquency categories in which the arrearages occurred.

To clarify even further, the customers' arrearage amounts could be reported in multiple delinquency categories based on how far past due the amounts are, but the customer would only be identified in the oldest applicable category and included in the number of customers in arrears for that delinquency category. In the example above, the customer would be placed in the 91+ days delinquency category and included in the number of customers in arrears under that category.

The current reporting format involves a manual process for utilities. By placing the arrearages in the delinquency categories to which they apply, it will be easier for the utilities to report and will remove any manual errors. The utilities have confirmed that this way of reporting is consistent with how they report arrearages to other areas within the Commission.

Staff recommends that utilities report arrearage amounts in the delinquency category to which they apply. To accomplish this, Staff will need to update the reporting template definition. To provide additional clarification, Staff recommends the Commission add an additional arrearage category to the reporting template for arrearage amounts that are being written off. To move forward, Staff will need to work directly with utilities to agree on a definition of when a customer is deemed written off and update the reporting template accordingly.

Recommendation 2.3 - Shutoff Information

Staff recommends reporting shutoffs only as the total number of customers shutoff during the month as they are currently reported within the Quarterly Report.

One area of concern that was broached during the subcommittee's process was how shutoffs are being reported. In the U-20757 Report, utilities are reporting customer shutoffs as of the last day of the month, whereas the Quarterly Report requires the total number of shutoffs for the month. The inconsistency in this reporting metric has caused confusion throughout the industry for utilities, media, advocates, agencies, customers, and Staff. The original purpose of reporting the total number of customers who remain shutoff as of the last day of the month was due to the COVID-19 pandemic. In 2020, the Commission and Staff were concerned with the number of households that remained disconnected at the end of a given month. The U-20757 Report was very specific in order to inform the Commission of the number of households that were currently without service. This data point, along with utility affirmations to not disconnect service provided the Commission with much needed customer focused information during the COVID-19 pandemic. Now that we are beyond the early pandemic crisis and utilities can disconnect customers in accordance with the Billing Rules, this data point is no longer needed.

Another reason to remove the shutoff data point contained in the U-20757 Report is that this data point is cumulative. To better understand the number of customers shutoff during the early pandemic, the Commission initially ordered reporting to reflect shutoffs from November 2019. Since the shutoff data point is cumulative, a

customer disconnected in November of 2019 may still be reflected as disconnected in current reporting. The customer that was disconnected in 2019 may have moved, or another customer may have placed the service in their name. Therefore, this data point is not a true reflection of the number of customers actively disconnected.

Moving forward Staff recommends that customer shutoffs be reported as the total number of shutoffs during the month. This is how they are currently reported within the Quarterly Report and will depict for Staff and the public a true number of customers disconnected for the given month. In order to accomplish this recommendation, Staff requests the removal of this data point that is currently tracked in the U-20757 Report.

Recommendation 2.4: Occupancy Information

Staff recommends the removal of the occupied/unoccupied reporting metric within the U-20757 Report.

The 'occupied/unoccupied' data point within the U-20757 Report associated with the COVID-19 pandemic was added to provide the Commission insight into the number of occupied households without service. Through this order the Commission required all utilities to reconnect services regardless of whether a payment was made to the account. Utilities are now following normal procedures as outlined in the Billing Rules due to the expiration of the 2020 COVID-19 affirmations.

Once service is disconnected, the utility does not know if a residence is occupied or unoccupied. Sending a representative to an address to verify occupancy is cost prohibitive and typically produces very little information. If a customer is not home or does not answer the door, it is difficult to identify if the address is occupied or unoccupied.

Recommendation 2.5 - Medical Emergency Denial Information

Staff recommends adding the total number of medical emergency denials and total number of critical care denials during the month to the monthly report. To move forward, the data reporting template will need to be updated.

During the DARR journey, utilities have reported that most medical emergency and critical care denials have occurred because of the medical certification form being filled out incorrectly. Currently, the MPSC receives the reported number of disconnections prevented and customers restored by medical emergency and critical care protections. Obtaining the number of denials will allow Staff to ask additional and more pointed questions to the utilities to identify other issues with this protection.

Recommendation 2.6 - Customer Payment Performance/Shutoff Information

Staff recommends moving towards collecting shutoff and arrearage data by zip code or census tract. It is recommended that the Commission order a cost study to be completed by the utilities to see how much it would cost to report data by census tract as compared to reporting by zip code level. Cost was the main barrier when discussing census tract reporting; therefore, it is important to know what the costs

would be. Data aggregation should be completed in conjunction with Case No. U-20959. If accepted, Staff recommends annual submissions be made available to the public.

The DARR subcommittee discussed collecting data on a more granular level. The way to accomplish this is to have utilities report customer shutoff and arrearage data by zip code or by census tract in addition to the current reporting. Being that this level of reporting would contain large amounts of data, DARR determined that this level of data submission should be submitted annually. Staff is not currently recommending one way of reporting over another but would like to lay out the pros and cons so the Commission can decide.

[Zip Code Data Collection Pros and Cons](#)

Pros - Collecting data by zip codes is more granular than current reporting. Shutoff and arrearage information by zip code will help the Commission and public identify areas impacted by shutoffs. This would help the Commission and local governments design programs with specific areas of the state in mind. Utilities can provide data in this way without many added costs to ratepayers.

Cons – Zip codes can span multiple service territories; this may cause confusion. Along with spanning multiple service territories, zip codes are very broad and can span multiple cities, towns, or villages. Therefore, this data may not be granular enough in some instances.

Zip codes may change based on local post office closures or internal reviews by the United States Postal Service. Any changes would cause confusion if comparing past zip code performance. It is possible for cities to have multiple zip codes, so collecting data by zip code would not give the full picture of a city or town that may be affected by shutoffs.

Utilities are also concerned that zip code level data could be misconstrued because they do not consider zip codes when disconnecting service or collecting debt from a customer. They are concerned that this data may make it appear that they are targeting one geographic area more than another. Some zip codes have more customers eligible for disconnection due to the poverty level of the area.

[Census Tract Data Collection Pros and Cons](#)

Pros – During conversations within the DARR subcommittee it was discussed that census tract is the most granular level of data collection that still complies with data privacy rules. Census tract breaks geographic data down further than zip code level data. Collecting shutoff and arrearage data by census tract would help the Commission, utilities, and local governments design specific programs that can be pinpointed to areas in need.

Cons – The utilities voiced that reporting data by census tract would be costly and that this could raise rates. They claim this is counterintuitive and could harm the customers we are trying to support with this data.

Utilities are also concerned that this data could be misconstrued because they do not consider census tract when disconnecting service or collecting debt from a customer. They are concerned that this data may make it appear that they are targeting one geographic area more than another. Some census tracts have more customers eligible for disconnection due to the poverty level of the area.

Recommendation 2.7 - Restoration Information

Staff recommends adding the number of customers restored within five days of being disconnected for nonpayment to the monthly report. If accepted, the form will need to be updated with the metric and definition.

Currently, Staff receives reports on the total number of customers restored for the month. By adding the number of customers restored within five days of disconnection, Staff and the public will have a better understanding of the number and percentage that have their services restored within 5 days of disconnection.

Five days is consistent with the proposed Billing Rule 143(5) in Case No. U-21150. This rule requires utilities to send a letter informing customers that their services have been disconnected and informs the customer of what needs to be done to have service restored. During the rule making process utilities informed Staff that a high percentage of disconnected customers have their services restored within five days. Therefore, to avoid confusing customers, the restoration letter is not sent until five days after disconnection.

Recommendation 2.8 - Part 7, Regulatory Review

Staff recommends the Commission open a new docket to review the current Medical Certification Form (current form approved under Case No. U-18479) and seeks adoption of the new protection.

This form serves to provide verification of the type of medical equipment or life support system a customer requires. It certifies that the interruption of service could potentially aggravate the customer's health or could be life threatening.

Utilities provided the subcommittee key data points in Appendix E focusing on the number of customers who participated with a medical protection, denials of a medical hold, and arrearages. It was discovered that a large percentage of customers seeking the protection were denied. Through the subcommittee, a lengthy discussion ensued questioning the reason for these denials. While utilities do not specifically track this information, utility experts present in the meeting shared anecdotal evidence. They reported that many customer denials for medical emergency or critical care protections were due to either fraud or the medical certification form being incomplete. After reviewing the current medical certification form, medical industry forms, other legal contracts, and obtaining utility insight, DARR is recommending the name and date of birth ("DOB") of the patient be added to page four of the existing form, Appendix F. This added information would identify who the protection is warranted for, especially if only page four was provided to the medical professional. This information is consistent with other existing medical

forms where the patient's name and DOB is required on each page of a medical document and would help alleviate fraud and miscommunication.

Recommendation 2.9 - Low-Income WPP (R 460.131)

Staff recommends the Commission encourage utilities that are not offering "other shutoff protection plans" to explore different payment plan options similar to other industry shutoff protection plans. This would allow utilities to create a shutoff protection program that is best suited for their customers.

The WPP protects low-income customers whose annual household income is at or below 150% of the federal poverty level from service shutoffs and high utility bill payments during the heating season, November 1 - March 31. A customer can also participate if they receive services from MDHHS cash assistance, Supplemental Security Income ("SSI"), SNAP, or Medicaid.

Under the WPP, a low-income customer is required to pay at least 7% of their estimated annual bill each month during the protection period. At the time of enrollment if the customer has an arrearage, the utility will distribute the amount in equal monthly installments between the date of the application and the start of the next heating season. If services were already disconnected at enrollment, the utility cannot require the customer to pay a security deposit or restoration fee and cannot require a payment amount greater than one-twelfth of the arrearage owed. At the end of the heating season, utilities will then reconcile the account so that the customer is obligated to pay any outstanding amount in equal monthly installments between April 1-October 31st.

The rule also allows utilities to provide an optional shutoff protection plan for eligible low-income customers that meets or exceeds the criteria and customer protections offered as a baseline under WPP. Both Consumers Energy and DTE offer WPP and an optional plan called Shutoff Protection Plan ("SPP"). These optional plans are outlined in each utility's tariff, Appendix H. These two utilities use this optional payment plan as an additional solution for customers. When compared to the WPP, the SPP allows customers a longer period over which to resolve arrearages.

Recommendation 2.10 - Critical Care Protection (R 460.130a)

Staff recommends that the Commission issue an order for the creation of a critical care protection collaborative to discuss possible rule changes focusing on the critical care customer journey and detailing the appropriate steps for a customer to seek assistance both at enrollment and renewal period. Also, the critical care collaborative will explore payment plan options for non-income-qualified customers prior to receiving recertification. Because the critical care protection rule is not based in statute like the medical emergency protection, changes can be affected solely through the rule-making process. Staff recommends that the Commission direct Staff to work directly with MDHHS to develop a process to allow income-qualified, critical care customers to receive assistance while still being protected.

The critical care protection allows any customer, who has an inability to pay a utility expense and who requires or has a household member who requires home medical

equipment or life support, protection from shutoff where an interruption of service would be immediately life threatening. The customer must annually provide to their utility company a Commission-approved medical certification form from a physician or medical facility identifying the medical equipment or life support system and certifying that an interruption of service would be immediately life-threatening.

In 2017, the critical care protection was established to address the specific needs of vulnerable customers in acute, life-threatening situations. This protection, the first in the nation, allowed for additional protections beyond those provided under the medical emergency protection.

Since its adoption, Staff has been tracking how the critical care protection assists or hinders a customer's journey. Customer issues with the protection have come to light through the customers themselves, utilities, grantees, the media, and collaboratives. For many customers, the added protection is working, allowing them to pay their utility bill while having the shutoff safeguard in place. However, there are others who have made few payments while under this protection and some customers have never made a payment, even as their outstanding balance continues to grow. There are customers under the critical care protection who, due to lack of payment over several years has built unaffordable outstanding balances. These amounts can range between a few thousand dollars to over \$20,000. In 2021, both DTE and Consumer Energy reported that 200 customers under the critical care protection had outstanding balances between \$1001 and \$10,000 with a total of \$618,821.12 in arrearages, and 12 customers had a balance exceeding \$10,001 with total arrearages of \$222,325.48, Appendix G. Due to the design of the protection, customers are encouraged but not required to make a payment to retain active service. After the initial protection has lifted, a customer is required to resubmit certification; however, there is not any requirement for the customer to partially pay outstanding bill balances. Rule 460.1309a providing for this protection states that nothing relieves the customer of his or her obligation to pay for utility services.

Even though the customer has been continually billed during the protection period, these high bills come to light when the critical care customer is no longer protected (i.e., deceased, customer is no longer defined as critical care, etc.) At this point in time, the customer is then responsible for any outstanding balance. Customers are encouraged to work directly with their utility to enroll in a payment arrangement or seek assistance. If the customer is income-qualified for assistance, their arrears are often too high for assistance due to household caps on programs. Lack of assistance and unreasonable payment plans can result in the discontinuation of service. Customers are not eligible to receive assistance while being protected under critical care because MDHHS does not constitute critical care customers as in "crisis." The customer would have to be removed from the program and receive a past-due notification in order to get assistance.

Subcommittee participants shared experiences on how to assist this segment of customers who carry high arrearages. It was agreed that there is a lost opportunity for income-qualified customers to seek assistance at both the registration and renewal period. In addition to the critical care medical certification process, DARR

recommends requiring customers to seek assistance prior to enrolling in the critical care program to help eliminate arrears. If the customer is denied for assistance, they can still be eligible for the critical care protection. DARR recommends adding a new rule for customers who are in arrears and eligible for recertification that requires income-qualified customers to apply for assistance and to require all customers to make a pro-rated payment of their annual usage onto the account. The WPP, R 460.131, offers a similar pro-rated payment plan while the household is protected. Since a significant number of customers have high arrearages or have not made a payment on their account while being protected, it was agreed that requiring the customer to complete some type of action on their account may keep them engaged with their outstanding balance.

An additional opportunity building on this recommendation and supported by Staff was discussed in AAA (recommendation 1.8, page 19). This recommendation calls for a redefining of crisis for energy assistance programs (LIHEAP & MEAP) to include critical care and medical hold customers with accruing arrears. This change would prevent customers from accruing unmanageable arrears who meet LIHEAP and MEAP income qualifications and are on shutoff holds.

Recommendations for work groups and agencies outside of the MPSC

Recommendation 2.11 - HHC and the WPP

DARR recommends changing the requirement mandating customers receiving the HHC be placed on the WPP. Staff is recommending that the Board discuss different payment plan options in addition to the customer protections provided in rule by working directly with Treasury to get a clear understanding and intention of the provision requiring customers of regulated utilities to be placed on the WPP. The goal of this collaboration is to explore payment plan options to help make a customer's journey more successful.

Under state law, households may receive heating assistance in the form of the HHC to help prevent shutoff of their heating fuel service. Eligible customers must meet guidelines based on household income, exemptions, and heating costs.

Under the statute, Act 281 of 1967 - Section 206.527, the acceptance of an energy draft by a regulated utility is considered a request by the claimant for the WPP. While the WPP provides important shutoff protection during the winter heating season for low-income customers, this requirement might not be in the best interest of some customers due to the shorter period for paying off arrears combined with their current usage. There are opportunities for providing assistance and payment plans that provide more flexibility. Since a single program does not meet the needs of all customers, some customers may be better served by a different payment plan, program, or assistance that provides a path to success.

Recommendation 2.12 - Change the co-payments requirements within MDHHS, assistance approval process

This concern was brought forward in the DARR session on the lived experience of customers, and Staff recommends the AAA subcommittee be the lead working in tandem with MDHHS to correct the problem.

Stakeholders shared that when some customers apply through the MDHHS MI-Bridges portal for SER at the same time as weatherization services, the customer could be denied assistance because of the inability to afford required co-payments for weatherization. SER is a crisis relief program designed to prevent shutoff or restore electric and natural gas in a customer's home. Although weatherization services are a key element in helping reduce a customer's home energy usage, copays for these services shouldn't determine whether or not a household receives SER. DARR agreed that these co-payments should not be batched with "crisis services" and considered a reason for denial of SER. Currently, MEAP grantees have found workarounds by telling customers to only apply for SER as a standalone first, then later apply for weatherization. This allows the customer to get the crisis addressed first, while still having the opportunity to receive other household assistance. Without this workaround, customers have to wait 30-days to reapply for SER. This could cause the customer to be disconnected or placed further into arrears.

Reviewed suggestions and concepts that are not supported by Staff

The below suggestions and concepts were discussed by Staff and the subcommittee but for the reasons outlined below are not being recommended by the Staff at this time:

Part 7 - Regulatory Review

2.A. Require customers who are protected under Part 7 of the Billing Rules to make full or partial payments, and if not, the customer must communicate with the utility

A utility identified through data research that customers are more often in danger of disconnection at some point when they receive a Part 7 protection if they are not making payments on their accounts and do not communicate with their utility. The utility's position is that if a rule was added requiring customers to communicate with the utility, it would allow them to provide eligible customers with opportunities to seek assistance and offer different payment plan options before the arrears are too high. This would put the customer in a position where disconnection is less likely to occur.

Staff disagrees with this recommendation but understands the need for the customer to be engaged with their account balance. The majority of the protections outlined under Part 7 are statute based and allow a customer protection for various reasons regardless of whether a customer makes a payment or contacts the company regarding their account. Customer engagement is important; however, if

the customer is not engaged with their account, they are still protected per the rules.

2.B. Customers who engage in fraud related to Part 7 of the Billing Rules should be penalized, particularly customers who have engaged in fraud more than once

Customers are allowed to receive any Part 7 protection even if fraudulent activity has previously occurred on their account. Staff understands the request to hold customers accountable for fraud and also institute a disincentive for fraudulent activity. Currently, the Billing Rules have specific penalties for customers who engage in fraud, which is defined as unauthorized use, where a customer would be required to pay a fee or higher amount in order to obtain or continue services. The stakeholder journey identified that a large portion of denials for medical emergency and critical care protections were due to fraudulent activity. In order to move forward with a fraud penalty recommendation, a new stakeholder engagement process would need to occur to see what changes would need to be made to the existing statute. These changes may include creating a definition for Part 7 fraud and for confirmed fraud, looking at utility record retention, the notification process, and suspension periods.

Staff is not currently recommending a stakeholder engagement process around penalties for fraud because, if the proposed changes to the medical certification form are made, it should alleviate a large portion of the concern.

2.C. Medical Certification Form Consolidation

DARR tried to dissect the reasons why customers were being denied for medical emergency and critical care protection when using the medical certification form. To make things easier on the authorized physician, a suggestion was brought forward to consolidate the two different protections into one summarized area allowing the expert to check if the customer would qualify for medical emergency or critical care.

When the original medical certification form was created, it was in everyone's best interest to keep each protection separated to avoid confusion for the medical professional. Listing the medical emergency and critical care separately, even if the timeframe and equipment are duplicated, allows everyone a clear picture of what protection the physician is authorizing for the customer.

2.D. Medical Emergency Protection Changes (R 460.130)

A customer or member of the customer's household can receive a medical hold preventing service from being shutoff for nonpayment on their natural gas and/or electric bill for up to 21 days. The customer must have an existing medical condition that would be aggravated by the lack of utility service. The condition must be certified by a physician or public health official on an MPSC approved Medical Certification Form. The form must state the medical condition, medical equipment, and specific time period a shutoff of utility service would make the medical condition worse. If the shutoff of service occurred before a medical emergency is approved, the utility will restore service at no cost to the customer for 21 days. A customer can receive an extension of the medical hold and a postponement of

shutoff of service for a total of 63 days (three separate medical holds) per household member in any 12-month period. A utility is not required to grant shutoff extensions totaling more than 126 days per household annually. Customers are granted a three-business day grace period from shutoff of utility service for time to have the Medical Certification Form completed.

Most of the protections outlined within the rule come directly from statute, Act 3 of 1939 - Section 460.9s, and are consistent with other states. Within the DARR subcommittee various comments were made related to the Medical Emergency Protection regarding protection limits, grace periods, authorized persons, and the denial process.

Advocates suggested lifting the cap on the number of days the customer or household may receive protection. If the cap is removed, similar to Critical Care Protection, the customer would not be obligated to make a payment on the account, which could lead them into higher arrearages.

The current protection is consistent with other states and also correlates with current Billing Rules, R 460.120 (3) bill frequency and delivery and R 460.123(1) payment of bill.

Staff believes lifting the cap on the number of days a customer may receive protection would make the Medical Emergency Protection too similar to the Critical Care Protection. Critical Care is designed only for customer who have medical conditions that may be immediately life-threatening if services were discontinued. Whereas the Medical Emergency allows customers a shorter period of time to address their situation.

Advocates suggested allowing a longer grace period for a customer to obtain a completed Medical Certification Form. Currently, the grace period is three business days in which the utility shall postpone the shutoff of utility service. This portion of the rule is not in statute and was inserted in 2017 because it was identified that the certification process was chipping into the customers protection period. The rule was added allowing customers time to get the necessary forms completed without using any of the 21-day protection.

To date, Staff has not received complaints stating this portion of the rule is not adequate. Advocates did not provide information regarding why the current standard is not adequate nor any guidance on a reasonable time frame. Therefore, Staff does not adopt this recommendation.

Advocates suggested allowing other professionals beyond what is defined in the current rules to certify for a medical emergency. The current definition states the customer's condition must be certified by a physician or public health official on a Medical Certification Form.

Both Staff and utilities rely on physicians and public health officials for their medical expertise to certify a customer's medical condition requiring electric or natural gas service. The Commission has not received any complaints and no real-

life situations were made indicating this was a barrier to receiving a medical hold. Staff believes the statute and rule are sufficient and does not need to be changed at this time.

Advocates also brought forward the need for a medical emergency appeal process when denials occur. It was discussed that a number of these denials occurring were due to the medical certification form not being filled out correctly or changes made during the validation process. As outlined in this report, Staff is requesting modifications be made to the form to help alleviate some of those mishaps.

Staff believes that the modifications to the form will alleviate some denials. Denial numbers will be tracked as recommended by requiring utilities to identify the number of medical emergency denials that occur each month. Today, if a customer is denied they could seek recourse by filing one of the following: an informal complaint through the MPSC, a customer hearing through their utility, and/or a formal complaint through the MPSC. This is consistent with any other utility issue.

2.E. Critical Care Protection (R 460.130a) Arrears

As previously outlined, a Critical Care customer or household can receive protection from disconnection or have services restored due to inability to pay if there is an identified Critical Care customer in the home and interruption of service would be immediately life threatening. To remain on the protection, a customer is required to submit an updated Medical Certification Form to their utility at each anniversary.

DARR is recommending to the Commission that during this recertification period the customer be required to seek assistance or make a payment on the account. The amount would need to be outlined during a new stakeholder initiative.

A utility suggested that a customer should be removed from the Critical Care Protection if their arrears reach an agreed upon threshold.

Staff disagrees with the recommendation. The intent of the protection was to assist customers in severe medical need regardless of arrearage. In order to help assist customers in arrears, Staff has recommended a change to the Critical Care process requiring customers to seek any needed assistance at both enrollment and renewal.

2.F. Extreme Weather Condition Policy (utility plans approved under Case No. U-20140 per R 460.134)

The Extreme Weather Condition Policy requires all utilities to have a policy in place addressing criteria the utility will follow in suspending disconnection to residential customers during extreme heat and cold weather and outlining any preferential treatment to certain classes of customers.

When the rule was established in 2017, many utilities did not have an official policy in place. During the rulemaking collaborative process, it was agreed upon as a best practice to have the Commission require utilities to have an official weather policy in place addressing weather and customer types. When adopted, the utilities were

required to submit a policy to the docket. These policies took into consideration how weather has different variances across zones and/or other states and any preferential treatment for certain customer classification types.

Advocates brought forward a suggestion to streamline all weather policies for utilities to have the same standardized terms, provided specific degree polices, and suspension of service immediately before an extreme weather event and weekend. Many utility policies were not activated from 2019-2021 because they had already halted all disconnections due the type of weather being forecasted or enacted other programs during these types of events.

Staff does not believe a problem currently exists since utilities offer “goodwill” moratoriums and assistance with cooling and heating centers during extreme weather events. Utilities need to have flexibility to customize options in accordance with their territories and differing weather patterns throughout the state. The State of Michigan is experiences different weather in each given zone; therefore, standardizing policies would not be effective since weather is not consistent.

EAAC Definitions Subcommittee

Committee Process

On August 26, 2021, the Definitions subcommittee convened to address a three-fold charge from the Commission’s order in Case No. U-20757 including: a) to establish a common definition of energy security/self-sufficiency beginning with the definition proposed by MEAP Workgroup Subcommittee Two; b) to develop a proposal for an energy affordability standard and how the standard can be integrated into the regulatory environment; and c) to draft suggested requirements for consistent energy affordability-related information for utilities to submit to appropriate dockets such as rate cases, Integrated Resource Plans (“IRPs”), and EWR cases.

The subcommittee began its work with the first part of the charge and discussed the definition to which they were trying to arrive. The group concluded that energy affordability was the term that was most important to define. A thorough search failed to uncover any existing definitions of energy affordability and revealed that most users when referencing the term defaulted to the concept of energy burden. With this information, the subcommittee undertook a deliberative process to vet a variety of concepts that appeared in others’ definitions of energy security and self-sufficiency as they applied to the concept of energy affordability.

After the subcommittee tested these concepts and developed some consensus, they were shared with a broader group of stakeholders for additional feedback and confirmation. Feedback supported the inclusion of concepts within the definition, and work turned to the drafting of a companion document to accompany and support interpretation of the definition.

In August 2022, the subcommittee concluded its work on the first charge and proposed a definition of energy affordability to the LIEPB which the Board supported at its August 2022 meeting. The definition, ***“a household has the resources to meet their home energy needs for heating, cooling and other uses in a healthy, sustainable and energy efficient manner without compromising a household’s ability to meet other basic needs,”*** was accompanied by a companion document further elucidating the concepts of “healthy, sustainable, and energy efficient,” as well as describing in detail the methodology for arriving at the definition.

Since completion of the first charge, committee leaders have been assessing how best to move on to the second and third charges, including developing a proposal for an energy affordability standard and drafting suggested requirements for consistent energy affordability-related information for utilities to submit to appropriate dockets.

Challenges

Challenges encountered in the process of defining energy affordability included building and arriving at a consensus. The committee was comprised of a small but diverse group of stakeholders, and opinions sometimes varied widely on certain aspects. At some decision points, this became a barrier to decision making and subcommittee leaders decided to improve confidence in the definition by seeking input via survey, particularly from those most impacted by the affordability of energy.

Outcomes and Recommendations

Outcomes

Although diverse in representation from stakeholder groups, the committee itself cannot claim to be fully representative of the needs of low-income households and the impacts they experience as a result of challenges with energy affordability. Therefore, in addition to soliciting input into the definition of energy affordability from those with lived experience and those on the front lines of providing assistance, questions were designed for agency fair listening sessions to gain further insights into what energy affordability means to those seeking assistance. Staff continue to solicit feedback and gain insights into the experiences of low-income customers from a diverse array of Michigan communities. Listening sessions were held in Gaylord, Benton Harbor, Marquette, Grand Rapids, and Melvindale, with others being planned in the future.

The subcommittee arrived at a definition of energy affordability. Some of the concepts included in the definition of energy affordability were open to interpretation. To clarify these concepts and help inform future policy and program activity, the committee felt that a companion document to the definition would be useful in its application. A companion document was developed and is provided as Appendix L.

Recommendations to the Commission

Recommendation 3.1 – Adopt the Proposed Definition of Energy Affordability

The Definitions subcommittee has recommended a definition of energy affordability, “a household has the resources to meet their home energy needs for heating, cooling and other uses in a healthy, sustainable and energy efficient manner without compromising a household’s ability to meet other basic needs” along with its companion document to the LIEPB, which the Board is in turn providing as a recommendation to the Commission.

Recommendation 3.2 – Update the Charge of the Definitions Subcommittee

Upon completion of its first charge, subcommittee leaders recognized that in the two years since the EAAC was formed, there has been movement within the Commission, and a directive to define equity and related terms was given in Case No. U-20836. Staff recommends that the charge to the Definitions subcommittee be changed to define equity and related terms as detailed in the Collaborative Structure section of this report. This has resulted in a recommendation to re-assign the second and third charges to other subcommittees going forward.

EAAC Outreach and Education Subcommittee

Committee Process

In its February 18, 2021 order in Case No. U-20757 (page 20), the Commission charged the Outreach and Education Subcommittee (O&E Subcommittee) with:

1. Establishing a regular mechanism for stakeholders to provide input on improving communications and materials.
2. Broadening outreach to groups traditionally not a part of utility communications.
3. Improving the dissemination of energy assistance information to difficult to reach customers.

The subcommittee, comprised of approximately fifty individuals representing community organizations, advocates, utilities, and MEAP grantees, is led by two stakeholder and two Staff co-leaders who identify committee priorities, set the meeting agenda, and lead meeting discussions with subcommittee members. Since November 2021, the subcommittee has met eight times to discuss the Commission’s charges to the Committee.

In 2022, the subcommittee planned to focus on three goals:

1. Establishing a process for stakeholder and community-based input re: materials and communications channels.
2. Review and provide input for improving the Commission’s Energy Assistance Toolkit.

3. Identify community-based groups not already a part of the Commission's outreach.

The subcommittee began its 2022 work with level setting presentations covering the Commission's charge, the Commission's outreach parameters, and reviewing the MPSC's materials and material development process. Following these level setting presentations, the subcommittee held three working sessions. The first focused on reviewing the Commission's energy assistance and shutoff protection materials; the second featured a discussion regarding identifying community outreach partners; and the third focused on identifying and reaching hard to reach customers. During the course of these working sessions, subcommittee members provided valuable insight and perspectives to Commission Customer Assistance and Communications Staff.

Charge 1: Establishing a regular mechanism for stakeholders to provide input on improving communications and materials

While many customers may experience the same education needs and communications barriers, customers within different communities may also face unique challenges. Therefore, a "one size fits all" approach to customer education and outreach is not recommended and this subcommittee suggests that a general mechanism for continuous collection of generic feedback on Commission materials may not provide the best insight into customer needs. Rather, a more community-focused approach to education, outreach, and materials feedback would ensure that materials are relevant to the community, valuable to the organizations using them and customers seeking to learn from them, and are easy to use and access.

Charge 2: Broaden outreach to groups traditionally not a part of utility communications

During the second working session, the subcommittee spent time brainstorming the types of groups that are not typically part of utility or Commission communications but have deep connections to the members of their communities. Included among these group types are neighborhood associations, libraries, agencies on aging, religious organizations, and parent teacher associations, among many others.

Charge 3: Improve the dissemination of energy assistance information to difficult to reach customers

In working to address this charge, the subcommittee asked three questions:

1. Who are difficult to reach customers?
2. Why are they difficult to reach?
3. How can we get around these barriers?

The subcommittee identified several types of customers as being difficult to reach. These included customers with limited English proficiency, customers with low literacy levels, those who are not "tech savvy" or those without access to technology, as well as those individuals facing crisis for the first time.

In identifying why customers are difficult to reach, the subcommittee posited that both a lack of knowledge about where to get help as well as a lack of trust toward both utilities and government entities all create barriers for customers to receive important information, including the availability of assistance.

Outcomes and Recommendations

The work and collaboration of the subcommittee has been invaluable to informing both stakeholder and the Commission's outreach and engagement plans, including building on information gleaned from the five energy assistance resource fairs and listening sessions that occurred in 2022. However, given the importance of direct engagement with local community organizations and tailoring outreach approaches to the needs of those communities and organizations as recommended above, the following recommendations are made:

Recommendations to the Commission

Recommendation 4.1 - Staff identify outreach partners among local community organizations

It is recommended that Staff identify potential outreach partners among local community organizations and engage with those community organizations that are using the Commission's materials to solicit feedback regarding the efficacy of the materials. Staff should also work with community organizations to identify information gaps and develop materials to help address these gaps.

While this work should be focused at the community level, discussions with subcommittee members provided valuable insight into current Commission materials and general customer education needs that will help to inform future Commission material development.

Recommendation 4.2 - Staff identify and build relationships with community organizations not typically part of utility or Commission communications

As the Commission works to expand its outreach work, it is recommended that Staff work to identify and build relationships with these types of community organizations in order to facilitate expanded customer outreach. This type of effort on the part of Staff has already begun to make an impact on the Commission's outreach efforts to vulnerable customers. Specifically, Staff has worked to engage these types of organizations to provide awareness of energy assistance materials and the Commission's Energy Assistance Resource Fairs. Several organizations have expressed an interest in continued cooperation and coordination to reach vulnerable households.

Recommendation 4.3 - Build trust through connections

Significantly, building trust directly with the customer or with agencies that work with customers emerged as a consensus recommendation for improving dissemination of assistance information to hard-to-reach customers.

Recommendation 4.4 - Coordinate outreach through the Commission's Communications Section

Outreach and education work should be dispersed and coordinated through the Commission's Communications Section and the LIEPB.

Recommendation 4.5 - Suspend and recall the subcommittee as needed

The Outreach and Education subcommittee should be suspended but may be recalled should a need arise.

Recommendation 4.6 - Provide periodic updates to the Board

The Commission's Communications Staff should provide updates at least annually to the LIEPB regarding the Commission's ongoing outreach and customer education efforts.

Recommendation 4.7 - Provide periodic updates to Subcommittee members

The Commission's Communication Staff should provide periodic updates to the members of the Outreach and Education subcommittee. Such updates could be provided either through a written format or through periodic meetings as Staff determines most efficient.

Energy Waste Reduction Low-Income Workgroup

Workgroup Process

The spring of 2022 saw the fourth anniversary of the EWR-LI Workgroup (EWR-LI) and continued throughout the year being more strongly engaged with the variety of involved stakeholder groups than ever. The workgroup has grown from the initial 60+ participants in the spring of 2018 to well over 400 individual stakeholders and it has continued its well-established role of being a nexus of interconnecting stakeholders, ideas, and programming. The monthly meetings continued to average 75-80 participants and occasionally eclipsed 100.

In 2022 the EWR-LI was brought under the guidance of the LIEPB where its Health and Safety subcommittee continued, and a new subcommittee was established to

focus on Workforce Development. Attempts were made early in the year to revive the 211 Project, but that effort proved to be too much for the Staff of Michigan 211 to commit to as they are still very much engaged with pandemic fallout.

As it has in the past, the EWR-LI meetings covered a variety of subjects and again demonstrated that energy efficiency is not limited to a small and select playing field, but in fact touches and engages with all aspects of the daily lives of the citizens of Michigan, including new and future initiatives involving carbon reduction and climate change mitigation.

The January 2022 meeting kicked off the Workforce Development subcommittee and focused on funding, barriers, and opportunities in workforce development in the clean energy and energy efficiency industry. That meeting featured a panel discussion with panelists: Grace Michienzi of Michigan Energy Innovation Business Council (“EIBC”), Ben Dueweke of Walker-Miller Energy Services, Jason Cole of Michigan Minority Contractors Association, Tim Skrotzki of Elevate, David Gard of the Michigan Energy Efficiency Contractors Association, and Ray Judy from the MDHHS Weatherization Training Center.

The March 2022 meeting featured a presentation by Jennifer Spiller of the City of Grand Rapids on their E.H. Zero Program: Policies and Programs for Equitable, Healthy, Zero Carbon Buildings; a presentation from Justin Schott, Project Manager at the Urban Energy Justice Lab on the University of Michigan’s on the Energy Equity Project; and an introduction to the EGLE Environmental Justice Screening tool (<https://www.michigan.gov/egle/maps-data/miejscreen>).

The April 2022 meeting featured a presentation of the Social Determinants of Health (SDoH”) by Ninah Sasy of MDHHS. In addition, Margaret Sanders (a graduate student) presented on the University of Connecticut’s American Association for the Advancement of Science (“AAAS”) SciTech and Human Rights FutureGen Scholars research project on health, energy, and equity. There was also a presentation from Amanda Dewey and Weston Berg of the American Council for an Energy-Efficient Economy (“ACEEE”) regarding the new state scorecard metrics. It should be noted that in the 2022 ACEEE state scorecard, Michigan was once again one of the top performing states and was highlighted as the state to watch in our region (<https://www.aceee.org/state-policy/scorecard>).

The May 2022 meeting featured a variety of internal MPSC reports presentations to various stakeholder groups. The Diversity, Equity, and Inclusion officer, Shatina Jones, spoke about her new office and role; and a report was provided on the LIHEAP Direct Support initiative. The bulk of the meeting was dedicated to reports on the various subcommittees of the EAAC.

The June 2022 meeting featured a report on DTE and Consumers Energy Low-Income Needs Assessment findings; a presentation from Andrea Salazar of Michaels Energy of Colorado on Environmental Justice and Equity in Electrification; and a presentation on “My Next Electric!”, a residential electrification project.

The July 2022 meeting featured a report out by the Health and Safety subcommittee; a presentation by Brett Little, Program Manager at the Green Home Institute on Electrification in Affordable Housing; and a discussion on environmental justice and equity by Quinn Parker of Encolor Consulting of Las Vegas.

The next meeting in September 2022 included a presentation by Madison Merzlyakov, Affordability and Assistance Manager at the Great Lakes Water Authority, on the collaborative opportunities available between low-income energy efficiency programming and low-income water service delivery. There was also a follow up presentation by MDHHS on the Social Determinants of Health.

The October 2022 meeting was led by the Workforce Development subcommittee with a panel discussion on Women in Energy Efficiency and Weatherization. The presentation featured opening remarks from MPSC Commissioner Katherine Peretick. The panelists consisted of Amanda Godward, owner of Ecotelligent Homes; Marnese Jackson, Co-Director of the Midwest Building Decarbonization Coalition; Heidi Johnson, Weatherization Specialist of Washtenaw County Office of Community & Economic Development; Erica Larsen, Sales Engineer at The Green Panel; and E'lois Thomas, President of SEEL, LLC.

The November 2022 meeting featured utility programming outcomes and achievements to date from DTE, Consumers Energy, UPPCO, and I&M.

The December 2022 meeting featured a presentation by ICF on DTE's Equity Insights and Inclusion Study; and a presentation by Kim Trent, Deputy Director for Prosperity at the Michigan Department of Labor and Economic Growth ("LEO"), on the Michigan Poverty Task Force.

Health and Safety Subcommittee

The Health and Safety subcommittee was one of the first subcommittees to form after the EWR-LI was created, and it continues in its highly engaged and active role. Like the subcommittees of the EAAC, the Health and Safety subcommittee is led by stakeholders, and any participating members who join these meetings play an assistance and advisory role. Past leadership for the subcommittee has included stakeholders from the Michigan Environmental Council and Habitat for Humanity of Michigan. The subcommittee is currently led by Alexis Blizman, a representative of the Ecology Center.

The Health and Safety subcommittee continues its multi-pronged approach to overcome the barriers of weatherization deferral mitigation. These approaches include stakeholder engagement including utility programming, engagement with the affected community, direct involvement in the programming of the Community Action Agencies, developing close working relationships with the involved state agencies, and crafting ideas on how to best promote an understanding of funding shortfalls and barriers. The subcommittee is currently working with the natural overlap that is occurring due to the on-going shortages in the energy efficiency and clean energy workforce and will be looking to develop best practice strategies to engage with other stakeholders and active committees.

Like all the subcommittees under the Board, health and safety was part of the discussion at the LIEPB retreat in September. Several new participants were involved in that conversation. The goals and strategies that came out of the discussion appear in the retreat workbook (Appendix J). Though many of these ideas had previously appeared in other forums, one salient proposal involves taking a long term look at the carbon impacts on weatherization deferral mitigation and energy efficiency which can be immediately measured in terms of health impacts. This corresponds directly with the U.S. Department of Energy (DOE) targeting of the health impacts of carbon mitigation, as well as the EWR-LI goal of developing metrics of the effects of energy efficiency and weatherization that can be converted into specific energy savings.

The Health and Safety subcommittee continues with its stakeholder led initiatives and doesn't have any proposals upon which the Commission might directly take a position.

Workforce Development Subcommittee

The Workforce Development (WD) subcommittee was newly established in 2022 and, with 64 active participants, is highly engaged. This subcommittee was co-led by participants from Elevate and Commission Staff, until recently when stakeholders from the Green Panel and MDHHS Bureau of Community Action and Economic Opportunity ("BCAEO") have taken an active leadership role.

The Workforce Development subcommittee, in its initial stages, merged with active groups that included Walker-Miller Energy and Michigan EIBC. The subcommittee receives monthly reports involving various stakeholder and utility workforce development projects and has initiated projects of its own along the way.

The WD subcommittee initiated a project in late summer of 2022 that culminated in its panel discussion regarding Women in Energy Efficiency and Weatherization. It was one the best attended EWR-LI meetings of the year. That project will continue into 2023 and will draw on the expertise of a broader range of experienced stakeholders, educators, business owners, and contractors. Stakeholders will seek out opportunities and best practices to eliminate barriers for careers in energy efficiency, green energy, and weatherization. Discussions on equity are a natural component and the MPSC DEI officer is an active participant.

Another objective of the WD subcommittee is to raise awareness and educational opportunities, at all levels and for all participants, at trade and technical schools regarding these ever-expanding fields. The current Walker-Miller/DTE Efficiency Academy Project is one example.

Support from the Commission regarding these initiatives is welcomed.

The development of partnership opportunities continues to be a committee goal and was also discussed at the LIEPB retreat. Current partnership projects include the MSHDA, Michigan Housing Opportunities Promoting Energy Efficiency Program (MI-

HOPE) program and the MDHHS Lead Abatement program, which also coincide with other EWR-LI initiatives.

Some of the discussions that occurred at the LIEPB retreat included identification of funding opportunities, certification and skill requirements, potential partnerships, and opportunities for stakeholder advocacy. All these topics are part of the discussion of the WD subcommittee and were reiterated at the retreat.

At the summit, workforce development took up a large part of the discussion in the EWR and Weatherization policy pillar as workforce is a fundamental component of energy efficiency and weatherization programming.

Outcomes and Recommendations

Recommendations to the Commission

Recommendation 5.1 – Define Weatherization

The EWR-LI recommends that “weatherization” be defined for use across departments and sectors. The concept of weatherization is too often confused with the DOE Weatherization Assistance Program (WAP) and means something different to different stakeholders. A common definition would expand opportunities for collaboration and allow “weatherization” to be more inclusive. (Appendix K)

Recommendations for Work Groups/ Agencies Outside of the MPSC

Recommendation 5.2 - Develop an office to serve as a nexus for energy efficiency and weatherization

This recommendation was developed by stakeholders in the strategy development discussion at the Low-Income Energy Policy Summit. (Appendix K)

Recommendation 5.3- Explore opportunities to leverage Federal funding.

The expansion of weatherization funding because of the spending restrictions of DOE dollars, as well as the very limited allocation of LIHEAP funds, was also discussed at length during the Summit strategy sessions. This has been mentioned in other forums as well. (Appendix K)

The EWR-LI Workgroup, along with the subgroups of Health and Safety, and Workforce Development continue to provide useful discussion and development for future EWR low-income programs and initiatives which are considered for utility company program design in the EWR biennial plan filings. As established in Public Act 295, as amended by Public Act 342, biennial plan filings are contested case proceedings where intervening parties along with Staff provide recommendations for Commission decision. The EWR-LI, along with its subcommittees, will continue to offer a venue for stakeholders, utility providers, state agencies, and Commission Staff to bring forth innovative ideas and program design to best serve the low-income customers of Michigan. The interaction of the EWR-LI with the LIEP Board and the EAAC subcommittees also contributes to the understanding of the interaction and

linkages between EWR, weatherization, and energy assistance for vulnerable households. The workgroup will continue to provide opportunity for much needed collaboration among participating groups.

Low-Income Energy Policy Summit

Summit Process

Directives

In the February 10, 2022 order under Case No. U-20757, Staff were directed to host one or two Low-Income Energy Policy Summits in 2022 with a goal of providing actionable recommendations to the Commission. The Summit(s) would bring both education and recommendations. Leadership would be provided by the LIEPB advisory committee and scheduling the summits and developing an agenda was left to the Staff's discretion.

Planning

In accordance with the developmental stages of the newly formed LIEPB, Staff determined that November 2022 would be appropriate timing for the Board and a broader group of stakeholders, many of whom were involved in subcommittee work, to focus on strategies.

A planning committee was convened in mid-July 2022 chaired by Audrey Dean from Consumers Energy and Mary Wilkins, MPSC Low-Income Energy Policy Specialist, with oversight from Board co-leader, Anne Armstrong from the MPSC. Members of the planning committee included Board members Synia Gant Jordan (lived experience), Martin Kushler (ACEEE), Briana Parker (Elevate), and Wende Randall (ENTF). Additional members included Jaclyn Hulst (energy customer), Antonette Noakes (Consumers Energy), and Jamie Scripps (EGLE-Contractor). The committee was supported by MPSC Staff, Melissa Preston and Amy Rittenhouse. The committee met every other week over the noon hour to inform decision making for the Summit, and Staff met several times with the lead facilitators and technical team to coordinate planning.

Bring Your Energy! Working Together Toward Sustainable Solutions was chosen as the theme for the Summit.

Participation

The planning committee explored various avenues of participation including making plenary and level setting sessions available virtually, reserving strategy and brainstorming sessions for in-person work, and allowing virtual participation options in strategy workgroups.

The goal of the event was active participation in strategy work. Concerns with offering virtual attendance included the feeling of exclusion and isolation by the virtual participant simply because of the proximity of being separated from the discussion by those participating in-person. It may have promoted a monitoring role rather than an active participant role. There was only capacity for 100 participants in-person, and it was important that policy experts be actively engaged in the strategy

sessions. Advertising for both in-person and virtual options could have resulted in people showing up beyond capacity.

Other identified limitations for hybrid participation included a lack of technological equipment in break-out rooms. The LARA facilitation team's experience with hybrid was also limited, with more expertise in all-virtual or all in-person meetings. There were concerns that timing and coordination would be more challenging and complicated with hybrid participation and having three separate tracks with the need for additional facilitators. An additional concern was that during the report out, strategies may not be fully defined or may not be included in recommendations. This could cause misperceptions and there may be unintended repercussions regarding content.

Staff populated an invitation list to participate in the Summit, beginning with the Board and those who had participated in EAAC and EWR-LI subcommittees. Additional policy experts were identified, and efforts were made to include participants with lived experience of energy poverty. With no mechanism available for compensating those with lived experience of energy poverty for their representation at the Summit, Staff contacted assistance agencies to ask if they could sponsor the attendance of those with lived experience who have engaged with their agencies.

Strategy work was planned under the three policy pillars of the Board: Customer Centered Engagement and Coordination, Affordability and Customer Protections, and Low-Income Energy Waste Reduction and Weatherization. Invitations were targeted to include those with system knowledge and balance participation between the three policy pillars. Staff extended 116 invitations to achieve a targeted capacity of 80 to 100 participants. An invitation summary is depicted in Figure 4.

Figure 4: LIEPB Summit Invitations

| INVITED | | | | | |
|--------------------|------------------------------------------|--------------------------------------|-------------------------|--------------------|-------|
| Policy Pillar Area | Cust. Centered Engagement & Coordination | Affordability & Customer Protections | LI EWR & Weatherization | Participant Choice | Total |
| Various Utilities | 5 | 7 | 6 | 5 | 23 |
| MPSC | 4 | 8 | 3 | 2 | 17 |
| State of Michigan | 2 | 8 | 6 | 4 | 20 |
| Lived Experience | 2 | 0 | 0 | 15 | 17 |
| MEAP Grantees | 6 | 8 | 4 | 0 | 18 |
| Organizations | 6 | 7 | 6 | 2 | 21 |
| Total | 25 | 38 | 25 | 28 | 116 |

Registrations were received via survey, and those indicating, "Place me where you need me," were assigned to a track. Including the team of seven facilitators, 95

participants were confirmed under three separate strategy tracks as depicted in Figure 5.

Figure 5: LIEPB Summit Registrations by Strategy Track

| REGISTERED | | | | | |
|--------------------|------------------------------------------|--------------------------------------|-------------------------|-------------------|-------|
| Policy Pillar Area | Cust. Centered Engagement & Coordination | Affordability & Customer Protections | LI EWR & Weatherization | Where you need me | Total |
| Various Utilities | 5 | 6 | 7 | 0 | 18 |
| MPSC | 4 | 8 | 5 | 0 | 17 |
| State of Michigan | 3 | 3 | 9 | 0 | 15 |
| Lived Experience | 3 | 2 | 0 | 0 | 5 |
| MEAP Grantees | 5 | 5 | 4 | 0 | 14 |
| Organizations | 6 | 7 | 6 | 0 | 19 |
| Total | 26 | 31 | 31 | 0 | 88 |

On the day of the event, heavy fog impacted traffic in some areas, and others communicated their inability to attend due to personal or family crises. The final in-person count was confirmed at 80 participants.

To expand input into summit strategies, a virtual summit option was offered on January 17 and 19, 2023 and advertised over several listserv groups. Over 100 individuals participated in the plenary session on the 17th, and break-out sessions organized around policy pillar areas were attended back-to-back on the morning of the 19th with 68 to 70 participants attending each of the three sessions. Feedback was invited through the chat, through the raised hand function, and through the opportunity for written comment to an identified email address.

Content

As noted earlier, the theme of the Summit was *Bring Your Energy! Working Together Toward Sustainable Solutions*, and the focus was to collaborate on solutions that would reduce the number of Michigan households with unsustainable energy burdens. The event was organized into three components: an opening plenary session, strategy breakout groups, and a re-convening to report out on the work accomplished.

Plenary

The opening plenary sessions included a welcome by MPSC Commissioner Tremaine Phillips who thanked both organizers and participants. His remarks stating “We have headwinds in front of us” put into context the collective and individual work of participants and focused on the macro-level challenges facing Michigan.

Commissioner Phillips began by describing challenges in the on-going and acceleration of the energy transition, one of the most transformative transitions in our nation’s history. The challenges included the scale and expediency of the

transition due to climate and environmental impacts necessitating reductions in greenhouse gases and other environmental pollutants. The shift from fossil fuels to renewables is requiring billions in investments, and many residents will earn their wages through this transition to work in the clean energy sector. A concern is how we avoid repeating the same injustices and inequalities found in the fossil fuel system.

Another challenge is the increased interconnectivity of energy systems highlighted by the current conflict in Russia and Ukraine. We have reached a new regional and global energy security milestone as we see utility bill increases due to rising natural gas rates caused by a conflict thousands of miles away. It is new for natural gas to be a globally priced resource. This trend will continue as natural resources necessary for vehicle electrification are sourced from overseas. We need to consider how we support resilience as we become more interconnected. Additionally, we are witnessing the weaponization of energy as a tool of warfare, and this is increasingly an issue of national security.

Commissioner Phillips described the democratization and decentralization that new energy technologies are providing. We are seeing increased availability and participation in demand response programs. There is continued research and elevation of vehicle electrification and vehicle to home, vehicle to building, and vehicle to grid technologies. We observe further acceleration and adoption of distributed energy generation resources. The customer of the future will increasingly be a dynamic, decentralized, and relied upon cog in the wheel of the electricity grid. Part of our role is to communicate to and guide customers to ensure that programs and opportunities are affordable, education and outreach materials are accessible, and pathways are available for all customers to actively participate.

Finally, he described the unabating power and force of abrupt climate change as evidenced by wildfires, hurricanes with rapid intensification, increased windspeeds and tornadic activity, and an increase in precipitation events. Even though we are locked into a certain period of global warming due to latency of carbon dioxide, all is not doom and gloom. There are micro and macro successes, and this type of meeting has potential for sustained impact. He told participants, "You all are lighthouses in the fog of anxiety, stress, and uncertainly households are facing in times of insecurity and challenges."

[Panel Discussion](#)

The summit included a panel discussion focused on the intersectionality of energy in the lives of low-income households and historically marginalized communities. The panel was moderated by Monica Martinez of Ruben Strategy Group and the Lansing based Michigan Legislative Consultants. Panelists included Bethany Stutzman, Community Impact Director at South Central United Way; Kelly Rose, Chief Housing Solutions Officer at MSHDA; MPSC Commissioner Tremaine Phillips; and Cory Connolly, Climate and Energy Advisor at EGLE.

To frame the discussion, panelists provided background on their respective sectors. Cory Connolly referenced the [MI Healthy Climate Plan \(michigan.gov\)](https://michigan.gov/MIHealthyClimatePlan) and its goals of getting to carbon neutrality by 2050, and to 52% emissions reductions by 2030. He asked, “How do we do as much as we can by 2050 to limit impacts of climate change?” Addressing this question via renewables, electric vehicles (EVs), and the built environment must be paired with performing in a just and equitable manner. The MI Healthy Climate Plan calls for a limit to an energy burden of no more than 6% of household income, an ambitious target. There is a justice imperative which aligns with ensuring resilient housing stock, preparation for impacts of climate change, as well as the practical challenge of getting two million buildings made efficient and electrified.

Kelly Rose followed with comments on the challenge of increasing access to housing for low-income Michigan residents. Michigan's housing stock is aged, with half built before 1960. Many renters have aged appliances and lack the finances to tighten the home envelope. Most low-income households spend 40-50% of their income on housing costs and live in poorest quality housing with very little control of over home energy costs. Unsustainably large bills lead to housing displacement and a cascade of negative impacts on the households. There is a need for a sustained investment in housing stock for many years.¹¹ This investment would lead to a myriad of benefits including environmental, housing stability, and reduced stress on low-income households. It is important to ensure input from those who are directly impacted. We must be aware of the potential for blind spots.

Bethany Stutzman focused on how energy burdens impact a client's physical and mental health. Many receive assistance due to a physical health issue, some resulting from COVID-19, others a short- or long-term disability resulting in a low, fixed income and a variety of other health related situations. Living in crisis day after day impacts reason and ability to assess, evaluate, and manage emotional communication. Putting food on the table, utility shutoffs, and concerns about whether children will be removed from the home can create and exacerbate mental health concerns. She provided the example of when a child has a major health issue, a parent can't focus on anything else. "All day every day... how would you possibly cope?" Systemic issues including racism, diversity, equity, inclusion, and justice also play into the needs of low-income households. Policies and solutions need to be informed by those impacted by them.

Monica Martinez reminded the audience how easily we can forget what actually happens in a household. The fear of children being taken out of a home is very real.

Other real barriers experienced in homes, according to Ms. Stutsman, include difficulty in accessing benefits, struggles with getting to an office to fill out an application, operating a computer system, and the need for welfare calls because people can't manage the stress of navigating application systems.

¹¹ [Michigan Housing Opportunities Promoting Energy Efficiency Program \(MI-HOPE\)](#)

Ms. Rose shared that aging infrastructure, the cost of housing, and energy affordability are linked. Having observed households with up to \$10,000 of energy arrears in the COVID-19 Emergency Rental Assistance Program was eye opening. There are competing priorities for household income, and many families are in continual crisis mode. "There are a lot of good things on the horizon, but we need to continue to invest state money to address these problems."

Mr. Connolly spoke to the immediate need for action and the need to reduce emissions by 2030 stating, "The planet is on fire." He also advocated for consideration of a justice-based plane of reality to provide people with a good quality of life. We have to apply a broader framework to the way we think about energy efficiency and weatherization. You cannot meet other goals without fixing building stock at a fundamental level. Mr. Connolly noted that there are many resources coming that we need to figure out how to sync up. Figuring out how we take a broader approach to decarbonizing homes lays a foundation for broader work and opens pathways for decarbonization.

When asked how we can do a better job coordinating existing and new efforts to make an impact for low-income customers regarding energy affordability, Commissioner Phillips highlighted the issues of the deferral of energy efficiency services due to needed updates to home structures as well as the need for effective coordination between these services and energy assistance. Staff have worked hard on linking energy assistance to EWR, deconstructing and reconstructing for a seamless hand-off. The EAAC and LIEPB are the think tanks that help us work through needed changes and implementation.

The moderator then turned to Ms. Rose to ask how we continue to break down silos and create seamless handoffs. She responded that the biggest missing link is a flexible funding source to get at the deferrals. Historically, the State has relied on federal dollars, and there is a need for State resources. There is also a need for coalition building to make housing investment a priority in Michigan. Flexible dollars are necessary to create an equitable and efficient program to pair with federal funds.

Ms. Stutsman was asked whether there are folks who are not in the room that need to be. She responded that the mental health system is taxed, but the voices of those in the midst of these systems still need to be at the table and compensated for their time and expertise. Another barrier experienced is that EWR services change criteria often, making referrals difficult. Systemic issues create barriers every day.

Ms. Martinez noted that we need to be true to our word, consistent with what we're saying, and follow through, because that is what builds trust.

Mr. Connolly responded to a question regarding how we get to a 6% energy burden for disproportionately impacted communities. He shared that flexible funds are important for a lot of these issues to fill the gaps. How can we be creative in thinking about that? How are we reducing the energy burden through efficiency? Some of it involves rate design such as household percentage of income payment programs. How do we make sure folks have participation? How do we increase the utility

participation fund? Clearly, if we had the answer, we'd be criminally negligent for not implementing it.

Ms. Rose spoke to the need to peel back to the least restrictive environment we can begin with available funding and to fill in the gaps left by the restrictions on federal funds. Mr. Connolly concurred, saying, "We're trying to get folks into healthy, decarbonized homes..., and flexible funding is a really big point." However, not everything is fixed with dollars. An eco-system of coordination and hand-shake-ability are important as well.

Ms. Stutzman followed that thought by emphasizing the need to continue to break down silos and simplify access to systems. She also stressed the importance of valuing the perspective of those experiencing the problem.

Commissioner Phillips summarized that the Commission is working on access to energy assistance, EWR, distributed generation, EV pilots, household or system wide data; equity and inclusion, outreach and consistent and genuine engagement; and reliability in the distribution system and safety of that system.

Ms. Martinez closed the panel discussion, commenting that all of our focus should be on how we could provide more for the families and individuals that Bethany spoke about because they deserve more.

In summary, the panel highlighted the following:

- Outreach and consistent, genuine engagement
- Valuing the perspective of those experiencing the problem
- Support for equity and inclusion
- Breaking down silos and simplifying access to systems- EWR, distributed generation, EV pilots, household or system wide data
- Peeling back to the least restrictive environment to fill the federal funding gaps
- Providing flexible funding
- Creating an eco-system of coordination and hand-shake-ability
- Reliability in the distribution system and safety of that system

Virtual Summit

Following the November Low-income Energy Policy Summit, additional stakeholder participation was encouraged to garner input into these strategies. The Commission held virtual report-out sessions under the same theme, *Bring Your Energy! Working Together: Sustainable Solutions to Energy Affordability*, at the following times:

- January 17, 2023, 10:30-12:00, Plenary Session
- January 19, 2023, 9:00-10:00, Affordability and Customer Protections Strategies
- January 19, 2023, 10:00-11:00, Customer Centered Engagement and Coordination Strategies
- January 19, 2023, 11:00-12:00, EWR and Weatherization Strategies

Each session contained an opportunity for comment and feedback. Presentations

were posted on the [Low-Income Energy Policy Board \(michigan.gov\)](https://www.michigan.gov/leapb) webpage, and comments were accepted via email through February sixth. Board members were impressed with attendance at the virtual summit where over one hundred persons logged into the plenary session, and 68-70 attended each of the break-out sessions.

Outcomes

The Low-Income Energy Policy Summit increased stakeholder participation in the collaborative work taking place under Case No. U-20757. Many of the stakeholders who participated in either the in-person Summit or virtual follow-up sessions were not previously engaged in workgroup processes. The Summit provided an opportunity to influence strategies and policy decisions that may not have otherwise been available to some of these stakeholders. Another benefit of the Summit was the foundational information and education offered to participants of the plenary session and the topical presentations.

Finally, participants developed consensus around shared objectives. This led to the creation and refinement of key strategies that have the potential to transform work around low-income energy initiatives moving forward. Several strategies identified at the Summit were echoed in subcommittees and are reflected in this report as recommendations 1.9, 4.1, 4.2, 4.3, 5.1, 5.2, and 5.3. See Summit Strategy Workbook included as Appendix K.

Collaborative Structure

The MPSC convened and engaged stakeholders in structured collaboration and feedback to help guide the accomplishment of the Commission's directives and incorporate stakeholder feedback in the orders issued under Case No. U-20757. These structures include an advisory committee known as the LIEPB, two workgroups, the EWR-LI, the EAAC, and subcommittees of these workgroups. Since this work began, subsequent orders in additional cases have directed work toward the EWR-LI and EAAC Workgroups. Following is a description of how the work is envisioned to move forward.

Low-Income Energy Policy Board

The LIEPB is centered on stakeholder leaders of the EWR-LI steering committee and EAAC subcommittees, is inclusive of those with lived experience, is enhanced with policy leaders from agencies and task forces, and is supported by Commission Staff resource experts. The Board will continue to serve in an advisory capacity supporting cross-pollination and system coordination when Board members, including subcommittee co-chairs and policy experts, bring insights and knowledge from their experience and work. Board members also share insights and knowledge from the LIEPB where there is cross-over or synergy with other efforts and support the coordination of energy assistance and EWR efforts.

The LIEPB has been invaluable in making connections, raising awareness, and sharing insights into concerns around low-income energy challenges and policy solutions. Board members bring innovative ideas and suggestions to help guide the work of EWR-LI and EAAC subcommittees and will consider recommendations to the MPSC and will continue to do so.

Workgroups

Since April 2022, leaders of two primary workgroups, the EWR-LI Workgroup and the EAAC were advised and supported by the LIEP Board. Outlined below are the shared goals and Commission directives assigned to each group and their subcommittees.

EAAC Affordability, Alignment, and Assistance Subcommittee

Co-chairs: MPSC Staff – Elaina Braunschweig, Jamie Curtis,
Stakeholders – TBD

Shared Goals:

1. Promote energy affordability.
2. Support program alignment for ease of access and use, effectiveness of administration, and evaluation.
3. Evaluate and improve systems of energy assistance.

Commission Directives:

1. Initiate a stakeholder discussion of DTE's report on the enrollment of customers in the LIA credit program and submit a report and recommendations to the Commission.¹²
2. Discuss the LIA/RIA enrollment assignment, enrollment cap, and best use/program pairings.¹³
3. Evaluate the feasibility of a low-income customer subclass in the Cost-of-Service Study (COSS)¹⁴
4. Develop a proposal for an energy affordability standard and how the standard can be integrated into the regulatory environment.¹⁵
 - Look at all aspects of energy affordability including rate design.¹⁶
 - Look at all aspects of affordability utilizing the definition of energy affordability.
 - Map where assistance and affordability tools intersect with aspects of affordability.
5. Evaluate and make recommendations regarding PIPPs.¹⁷

EAAC Data Analysis and Regulatory Review Subcommittee

Co-Chairs: MPSC Staff – Christine Forist, Jake Thelen
Stakeholders - Kasey Grieco, Rick Bunch

Shared Goals:

1. Review existing rules to ensure fairness for vulnerable customers.
2. Review existing rules to ensure effectiveness in administration.

Commission Directives:

1. Evaluate the rules pertaining to customer deposits.¹⁸
2. Evaluate the rules pertaining to collections.¹⁹

¹² Reference: U-20836 Timeline: DTE report due date approx. March 15, 2023.

¹³ Reference: U-20836 Timeline: not specified.

¹⁴ Reference: U-20963 Commission agrees that a COSS with a low-income customer subclass may be beneficial and recommends the company include a low-income customer subclass in the COSS for the EAAC in Case No. U-20757 but does not require it for the company's next general-electric rate case. Timeline: not specified.

¹⁵ Reference: U-20757 Timeline: not specified.

¹⁶ The AAA subcommittee is seeking clarification from the Commission on this directive.

¹⁷ Reference: U-20697 Pages 12-13; U-20940, Page 218, Timeline: U-20697 Timeline: no timeline defined; proposed timeline of 18 months (by "MEC" & "AG") was rejected. U-20940, page 218: PIPP "should reach its conclusion prior to discussion of increased low-income program limits and enrollment caps so that the efficacy of the program may be fully evaluated and intelligently inform such decisions." Provide a mid-program update and then evaluate in 2024.

¹⁸ Reference: U-20836 Pages 413-416 Timeline: not specified

¹⁹ Reference: Original AAA charge, awaiting Commission direction Timeline: not specified

EAAC Definitions Subcommittee

Co-chairs: MPSC Staff - Mary Wilkins
Stakeholders - Wende Randall, TBD

Shared Goals:

1. Provide definitions for a common understanding of words and terms utilized in communication around low-income energy policy.
2. Enhance and clarify understanding of defined words and terms.
3. In the defining of words and terms utilized in communication around low-income energy policy, broaden understanding of factors impacting low-income energy customers.

Commission Directives: The tasks below to define 'Equity' and related terms²⁰ will take into consideration the proposed definition of energy affordability. No timeline specified for definition of terms "equity," "environmental justice," "energy justice," or "grid equity" but those terms will be defined by work of the EAAC and can appear in future rate cases or distribution plans.

1. Define equity.
2. Define environmental justice.
3. Define energy justice.
4. Define grid equity.

EAAC Outreach & Education (Ad-Hoc)

Co-chairs: MPSC Staff - Reka Holley-Voelker, Mary Wilkins
Stakeholders - Briana DuBose, Briana Parker

Shared Goals: The Outreach and Education subcommittee shared goals aligned with the Commission directives and were achieved in 2022. This subcommittee will convene as necessary to gain additional stakeholder feedback and insights.

Commission Directives Accomplished:

1. Establish a regular mechanism for stakeholders to provide input on improving communications and materials.
2. Broaden outreach to groups traditionally not a part of utility communications.
3. Improve the dissemination of energy assistance information to difficult to reach customers.

²⁰ Reference: U-20836, pages 461-463

EAAC Customer Focused Data and Metrics Subcommittee

This Staff Subcommittee will assess and propose data strategies as straw proposals to which stakeholders may respond and provide comment.

Chair: MPSC Staff - Anne Armstrong

Shared Goals:

1. Improve the functionality and accessibility of customer related data. (LIEPB Goal – August 2022 Retreat)
2. Use data to better understand customer experience to allow for integration of energy assistance, EWR services and customer protections. (LIEPB Goal – August 2022 Retreat)
3. Provide a data strategy to assess energy equity measures.

Commission Directives:

1. Draft suggested requirements for consistent energy affordability-related and equity-related information for utilities to submit to appropriate dockets: rate cases, IRPs, EWR cases.²¹
2. Explore the inclusion of demographic information such as race, gender, and income; geographic information such as by zip code; extent to which low-income and senior households are receiving EWR and efficiency services; and energy burdens of customers. Could also explore existing publicly available data to use with utility specific data to achieve the same goal, e.g., MI EJ Screening tool.²²
3. Examine the long-term data collection strategy of the Commission that includes capturing specific demographic information and energy burdens of customers in coordination with the consideration of recommendations from the Commission's DEI initiative. Consider resources including the National Association of Regulatory Utility Commissioners ("NARUC") Data Resolution of 2019, LIHEAP Direct Support program reporting, and the MI Power Grid Customer Education and Participation workgroup on issues related to data access and privacy to ensure that any recommendations are consistent with Commission policy in this area.²³
4. Establish metrics for energy infrastructure.²⁴

²¹ Reference: U-20836 directives related to reliability and equity, U-20757 Timeline: not specified

²² Reference: U-20757 Timeline: not specified

²³ Reference: U-20757 2/18/21 and 2/10/22 orders; U-20836 Pages 462-464 Timeline: not specified

²⁴ Reference: U-20836 Pages 461-464, U-20757 As noted in the February 10, 2022 order, the Definitions-Ad Hoc Subcommittee would provide "a recommended energy affordability definition if consensus is reached or with options for an energy affordability definition if consensus is not reached" as well as "work with the Data and Regulatory Subcommittee and in consultation with the Commission's Diversity, Equity and Inclusion [DEI] Team to build recommended data requirements for utilities to

5. Adopt definitions for equity and related metrics for the energy infrastructure it regulates so all interested parties have a common understanding.²⁵
6. Low-income smart thermostat pilot: approved, and Consumers Energy directed to work with EAAC, other stakeholders/parties, to develop more specific equity-related metrics for Phase 2. Consumers to provide investigation, insight, and detail in next rate case.²⁶

EWR-LI Health and Safety

Chairperson: Stakeholder - Alexis Blizman

Shared Goals

1. To overcome the barriers of weatherization deferral mitigation.
2. To develop best practice strategies to engage with other stakeholders and active committees.

Commission Directives

1. None at this time
2. Other strategies identified at the LIEP Board Retreat in August 2022
 - a. Identify types of data needed.
 - b. Quantify the dollar amount to fund the deferrals.
 - c. Document and share success stories of people in energy efficiency/weatherization jobs.
 - d. Share best practices (such as “We want Green Too program”).

demonstrate energy affordability in appropriate dockets.” Id, pp. 8-9. In addition, the Data Analysis and Regulatory Review subcommittee “was delegated the task of examining the long-term data collection strategy of the Commission that includes capturing specific demographic information and energy burdens of customers in coordination with the consideration of recommendations from the Commission’s DEI initiative.” Id., p. 10. Given these ongoing efforts, the Commission finds that the work necessary to define equity and related terms as well as establish metrics for the energy infrastructure would be appropriate in the EAAC and its subcommittees.

²⁵ Reference: U-20836 Pages 461-464 This directive is paired with the following: (2) require the Company to include future analyses, like overlay maps, charts, graphs, and other displays, that provide a visual or data informed understanding of more holistic impacts of electric infrastructure investments on customer communities in future rate cases and distribution plans, and (3) request the Company work with Staff and interested stakeholders on a case study on the impact of socioeconomic data analysis and more comprehensive analysis of alternatives for the 4.8 kV system within the Company’s metro Detroit fiber loop in its next rate case.

²⁶ Reference U-20963, pp. 330-331 Timeline: not specified.

EWR-LI Workforce Development

Stakeholder Co-chairs - Briana Parker of Elevate and Commission Staff, until recently when stakeholders from the Green Panel and MDHHS BCAEO have taken an active leadership role.

Shared Goals:

1. Seek out opportunities and best practices to eliminate barriers for careers in energy efficiency, green energy, and weatherization.
2. Raise awareness and educational opportunities, at all levels and for all participants, at trade and technical schools regarding these ever-expanding fields.
3. Develop partnership opportunities.

Commission Directives:

1. None at this time
2. Other strategies identified at the LIEP Board Retreat in August 2022
 - a. Inventory/understand job types, number of jobs, certification/skills, and hiring organizations by geography, across the state.
 - b. Build relationships and connections between all stakeholder organizations and community residents.

Proposed Initiatives

In 2023, Staff proposes adding two additional workgroups into this structure including a State Administrative Workgroup to enhance collaborative efforts across state government and a Customer Experience Workgroup to further engage customers who have been challenged by energy affordability.

State Administrative Ad-Hoc Workgroup

To continue moving toward system change Staff recommends that leadership from MDHHS, the Treasury and the MSHDA collaborate on policy development that is informed by the work of the EAAC, EWR-LI Workgroup and the Board.

A State Administrative Ad-Hoc Workgroup, functioning as an arm of the Board, will be comprised of State government policy leaders. This workgroup may be convened as needed with policy leaders or their designates to work on weatherization or energy assistance related issues identified in workgroups or subcommittees of the workgroups within this structure. Leadership of this committee will be dependent on the agenda items under discussion.

Voluntary Energy Customer Experience Workgroup

The Commission has directed Staff to broaden participation of volunteers who are presently or have in the recent past been challenged with energy affordability. Staff has recruited LIEP Board members and sought participation in sub-committees and the Low-Income Energy Policy Summit; however, Staff believes there are additional

opportunities to deepen engagement. The Voluntary Energy Customer Experience Workgroup is proposed to engage low-income energy customers and inform the policy decisions impacting them. Participants will periodically meet with Commission Staff and respond to survey enquiries to provide input into the policy discussions that impact low-income energy customers. Activities would be comprised of listening sessions, field testing ideas, and completing surveys. Discussion topics could include raising awareness of customer concerns, system improvements for consideration by policy makers, informing agency fairs and listening sessions, and providing feedback on or field-testing ideas and solutions that other MPSC led workgroups propose. This group may then serve as a recruitment mechanism for other committees and decision-making bodies.

Figure 6: Proposed Low-Income Energy Policy Board Structure



Educational Forums

As part of the collaborative efforts resulting from Case No. U-20757, other orders referencing this case, or workgroups integrated with efforts under this case, the Commission in collaboration with the LIEPB will continue to host educational forums for stakeholders and the public. Staff envisions three potential types of forums to take place in this next phase.

Host utility presentations as directed in Commission cases

As directed by the Commission in Case Nos. U-20881, U-20876, and U-20875 utilities have been directed to provide presentations “to Low Income Working Group and Energy Affordability and Accessibility working group.” Staff will collaborate to ensure coordination of these efforts.

1. Host DTE Gas interim and final presentations of customer research findings and customer engagement metrics and geographic targeting implementation to Low Income Working Group and Energy Affordability and Accessibility working group. Presentation to be included on working group websites.²⁷
2. Host DTE Gas presentation of draft and final plan regarding geographic targeting implementation to Low Income Working Group and Energy Affordability and Accessibility Working Group. Presentation will be made available for public comment to DTE Gas.²⁸
3. Host Consumers Energy's multifamily program status update to interested parties in biannual update meetings and at the EWR Collaborative, EWR Low-Income Workgroup, and/or the Energy Affordability and Accessibility Collaborative at least once a year.²⁹

EWR-LI - Host low-income EWR-related presentations of interest to stakeholders

As it has been since its inception, the EWR-LI Workgroup will continue to host educational presentations for the benefit of stakeholders. Agendas will be coordinated with the EAAC.

EAAC - Host low-income energy related presentations of interest to stakeholders

The EAAC offered educational presentations in 2021, pivoting to focus on LIEP Board development and the Low-Income Energy Policy Summit in November 2022 and January 2023. Staff envisions providing additional educational presentations at key intervals in 2023 and beyond. These presentations will be coordinated with EWR-LI presentations and include straw proposals from the Customer Focused Data and Metrics Subcommittee.

Recommendations to the Commission Regarding Structure

Recommendation 6.1 – Staff recommends the Commission support the EAAC subcommittee structure outlined above. Create an internal Staff subcommittee regarding data and metrics to develop straw proposals for stakeholder feedback. Additional recommendations and clarifications from subcommittees are outlined in the recommendations regarding structure and process.

Recommendation 6.2 - Create a Customer Experience Workgroup under the LIEPB as described herein.

The participation of volunteers who are presently or have in the recent past been challenged with energy affordability is a priority for the Commission. The Voluntary Energy Customer Experience Workgroup is proposed to engage low-income energy customers and inform the policy decisions impacting them.

²⁷ Reference: U-20881 issued on January 20, 2022, pages 11-12 and 17-19, & U-20876 issued on January 20, 2022, pages 12-13 and 18-19: Phase 2

²⁸ Reference: U-20881 & U-20876 Phase 3

²⁹ Reference: U-20875 order issued on March 17, 2022, page 16 and Attachment B, page 5 - Multifamily Program Coordinated Delivery Timeline: Annually

Recommendation 6.3 - Create a State Administrative Workgroup under LIEPB.

The leadership of stakeholders in this process has been invaluable. To move toward a prevention-based system and away from cycling in and out of crisis, Staff urges the Commission to consider an approach that establishes collaborative work outside the Commission and encompasses all impacted state agencies. To continue moving toward system change, leadership from MDHHS, Michigan Department of Treasury and the MSHDA are invited to collaborate on policy development that is informed by the work of the EAAC, EWR-LI Workgroup and the LIEPB.

Recommendation 6.4 - Urge the workgroups under the LIEPB to maintain efforts to tie together EWR-LI and energy assistance programs and collect data to determine and support the efficacy of these efforts.

Compilation of Outcomes

As discussed earlier in this report, the Coronavirus response order, Case No. U-20757, was initiated in 2020 in response to concerns for the impact of the pandemic on customers, particularly those struggling with financial constraints before the pandemic and those whose income was suddenly curtailed as a result of viral containment strategies. As we evaluate the outcomes of the orders under Case No. U-20757 we recognize the prevailing concern for the impacts in the lives of members of historically marginalized communities and those who have struggled with energy affordability pre and post order. This section of the report discusses the difference this order and resulting efforts have made for these customers, stakeholders including utility companies, advocacy groups, non-profit service organizations, and Commission processes.

Staff wishes to thank listening session participants and workgroup, subcommittee, and Board members for their valuable time and efforts in contributing to these outcomes.

COVID-19 Response and On-going Communication Efforts

Due to the pandemic, communication practices were initiated that continue to enhance collaboration toward improving outcomes for low-income energy customers. Staff are continuing these practices and are actively pursuing opportunities to expand and improve communication and outreach efforts. This work is informed in part by the work of the EAAC and the Commission's customer-focused COVID-19 response efforts. Communications to connect the work of various groups and increase the effectiveness of service to low-income customers continue through several avenues as listed on page 4.

Low-Income Energy Policy Board

A significant outcome of the work flowing from Case No. U-20757 is that a group of influential policy and thought leaders has been assembled with a purpose of guiding the process of assessing energy affordability and accessibility holistically, especially through linking EWR services and energy assistance programs. This group, while continuing to develop cohesion, has established its values, developed goals, engaged stakeholders, and identified strategies to accomplish its purpose. Since its inception in April 2022, it has been positioned to guide and impact advances in the sustainable affordability of energy for Michigan's low-income customers.

Affordability, Alignment, and Assistance Subcommittee

Besides customer journey recommendations, the greatest accomplishment of the AAA subcommittee has been education. Subcommittee leaders were able to bring in presenters to educate on most aspects and programs in the energy assistance landscape, which led to the assembly of a document that diagrams how customers apply for and are referred through the energy assistance process from the

perspectives of MDHHS, MEAP grantees, and utilities.³⁰ Also included in the document is a detailed description of the energy assistance options with useful tables that break down program requirements by income level and whether or not a customer must be in crisis to receive the assistance.

The organization of information helped subcommittee members to visualize the complexities of energy assistance. This was especially helpful for members who were not as familiar with the process and helped to level set the group's knowledge base to facilitate more informed decisions. Analysis of the compiled information led to the recommendations for system and coordination improvements noted in both the subcommittee and Compilation of Recommendations sections of this report.

Data Analysis and Regulatory Review Subcommittee

The subcommittee provided a thorough review of the monthly utility customer payment data collected in Case No. U-20757 report and the Quarterly Report as described in the Billing Rules. Members discussed a long-term data collection strategy and Staff ensured that this data collection is working in concert with the Commission's direction on data collection and privacy. Staff also gave particular attention to Part 7 of the Billing Rules focusing on customer protections. This resulted in several Staff recommendations to the Commission, additional recommendations for workgroups or collaborations beyond the Commission, and several suggestions that were considered but are not supported by Staff at this time. Staff's recommendations will improve protections processes for customers, reporting processes for utilities and Staff, and information for stakeholder utilization.

Definitions Subcommittee

The subcommittee created a definition of energy affordability for foundational understanding in collaborative efforts. Some of the concepts included in the definition of energy affordability were themselves open to interpretation. To clarify these concepts and help inform future policy and program activity, the committee felt that a companion document to the definition would be useful in its application. This work can serve to inform the development of the definitions of equity and related terms and associated metrics. A companion document was developed and is provided as Appendix L.

The subcommittee solicited input into the definition of energy affordability from those with lived experience and those on the front lines of providing assistance. Questions were also designed for agency fair listening sessions to gain further insights into what energy affordability means to those seeking assistance. Staff continue to solicit feedback and gain insights into the experiences of low-income customers from a diverse array of Michigan communities. In the context of agency assistance fairs sponsored by the Commission, listening sessions were held in 2022 in Gaylord, Benton Harbor, Marquette, Grand Rapids, and Melvindale. Additional sessions are being planned in 2023.

³⁰ The "Low Income Customer Journey" document can be found and downloaded from the AAA Subcommittee [website](#).

Outreach and Education Subcommittee

Outcomes of the subcommittee process included insights that will inform and enhance outreach and educational efforts by the Commission. During working sessions of the subcommittee, members provided valuable insight and perspectives to Commission Customer Assistance and Communications Staff. The unique needs and challenges faced by different customers recommend against a “one size fits all” approach to customer education. Subcommittee dialogue has contributed to Commission outreach plans and material development. The subcommittee identified several types of customers as being difficult to reach, the barriers they face, and the types of groups that are not typically part of utility or Commission communications but have deep connections to the members of their communities. Members brainstormed ways of connecting with customers and overcoming barriers. Staff utilized these insights in outreach to communities where agency fairs were being held, to inform the listening sessions noted above, and in updating Commission materials.

Energy Waste Reduction Low-Income Workgroup

This Workgroup, while providing an opportunity for much needed collaboration, also offers a venue for stakeholders, utility providers, state agencies, and Commission Staff to bring forth innovative ideas and program design to best serve the low-income customers of Michigan. The interaction of the Workgroup with the LIEPB and the EAAC subcommittees has contributed to the understanding of the interaction and linkages between EWR, weatherization, and energy assistance for vulnerable households. The EWR-LI, along with its subcommittees provided useful discussion and development for future EWR low-income programs and initiatives which are considered for utility company program design in the EWR biennial plan filings.

Low-Income Energy Policy Summit

The Low-Income Energy Policy Summit increased stakeholder participation in the collaborative work taking place under Case No. U-20757. Many of the stakeholders who participated in either the in-person Summit or virtual follow-up sessions were not previously engaged in workgroup processes. The Summit provided an opportunity to influence strategies and policy decisions that may not have otherwise been available to some of these stakeholders. Another benefit of the Summit was the foundational information and education offered to participants of the plenary session and the topical presentations.

Finally, participants developed consensus around shared objectives. This led to the creation and refinement of key strategies that have the potential to transform work around low-income energy initiatives moving forward. Several strategies identified at the Summit were echoed in subcommittees and are reflected in this report as recommendations 1.9, 4.1, 4.2, 4.3, 5.1, 5.2, and 5.3. See Summit Strategy Workbook included as Appendix K.

After hours of collaborative effort on the part of subcommittee and workgroup participants, policy leaders, and key informants with lived experience, we are hopeful that the process is “creating an eco-system of coordination and hand-shake-ability.” We see short term gains resulting from our collaboration and envision long term impacts from the work we are accomplishing together. Staff are grateful to all those who have come to the table with their knowledge and ideas.

Compilation of Recommendations

In this section, you will find “General Recommendations” that cross over subcommittee work and speak to the collaborative work under Case No. U-20757 in general and include recommendations for moving the work forward. Following the general recommendations are listings of Staff recommendations ensued from subcommittee work. These are identified by the subcommittee where the topic was discussed and note the type of recommendation being made. Recommendations are organized in three sections: “Subcommittee Recommendations to the Commission,” “Recommendations Requiring Further Work,” and “Recommendations for Groups Outside the MPSC.”

General Recommendations

Recommendation 0.1 – Recommendation to extend the timeline of the EAAC

The Commission’s directives in Case Nos. U-20940 and U-20697 for the EAAC to evaluate and make recommendations regarding PIPPs³¹ requires more time by the EAAC than provided in the order issued on February 10, 2022 in Case No. U-20757 where the Commission agreed that it would be necessary for the collaborative “to continue into 2023, with assessment in the future as to the collaborative’s lifespan.” Staff recommends an extension of the EAAC and work of the LIEPB to continue through calendar year 2024 with re-assessment for work beyond that time. (Page 12)

Recommendation 0.2 – Role of the LIEPB

Considering the upcoming MEAP sunset and conversations regarding system changes at the Low-Income Energy Policy Summit, there is a recognition that the LIEPB plays an important role in informing system change. The months of work by dedicated stakeholders to this collaboration are critical in developing consensus and in understanding the nuances in policy decisions. Therefore, Staff recommends that (1) the LIEPB and associated workgroups serve as an avenue for vetting low-income policy issues and ensuring that the goals of reducing the number of households with unsustainable energy burdens and moving from crisis response to prevention are managed collaboratively; and (2) energy assistance and low-income EWR related legislative efforts consider the collaborative work of the Board. (Page 12)

Recommendation 6.1 – Staff recommends the Commission support the EAAC subcommittee structure outlined in pages 57-62 of this report.

Create an internal Staff subcommittee regarding data and metrics to develop straw proposals for stakeholder feedback. (Page 64)

³¹ Reference: U-20697 Pages 12-13; U-20940, Page 218, Timeline: U-20697 Timeline: no timeline defined; proposed timeline of 18 months (by MEC & AG) was rejected. U-20940, page 218: PIPP “should reach its conclusion prior to discussion of increased low-income program limits and enrollment caps so that the efficacy of the program may be fully evaluated and intelligently inform such decisions.” Provide a mid-program update and then evaluate in 2024.

Recommendation 6.2 - Create a Customer Experience Workgroup under the LIEPB.

The participation of volunteers who are presently or have in the recent past been challenged with energy affordability is a priority for the Commission. The Voluntary Energy Customer Experience Workgroup is proposed to engage low-income energy customers and inform the policy decisions impacting them. (Page 64)

Recommendation 6.3 - Create a State Administrative Workgroup under LIEPB.

The leadership of stakeholders in this process has been invaluable. To move toward a prevention-based system and away from cycling in and out of crisis, Staff urges the Commission to consider an approach that establishes collaborative work outside the Commission and encompasses all impacted state agencies. To continue moving toward system change, leadership from MDHHS, the Michigan Department of Treasury and the MSHDA are invited to collaborate on policy development that is informed by the work of the EAAC, EWR-LI Workgroup and the LIEPB. (Page 65)

Recommendation 6.4 - Urge the workgroups under the LIEPB to maintain efforts to tie together EWR-LI and energy assistance programs and collect data to determine and support the efficacy of these efforts. (Page 65)

Subcommittee Recommendations to the Commission

Recommendations regarding structure and process

Recommendation 1.1 from the AAA Subcommittee - Provide an updated charge that may reflect potentially unaccomplished work from the original charge, newly identified topics, and/or work that has been proposed to be addressed by the AAA in an updated EAAC structure. (Page 16)

Recommendation 4.5 from the O&E Subcommittee - Suspend and recall the Outreach and Education subcommittee as needed. (Page 43)

Recommendations regarding outreach

Recommendation 1.2 from the AAA Subcommittee - Encourage utilities to treat customers who self-attest to RIA the same way as SER and HHC recipients are treated for outreach and services offered and provide an EWR referral where applicable. (Page 18)

Recommendation 1.3 from the AAA Subcommittee - Order all regulated utilities to work with Staff to advertise the RIA along with other assistance offerings on their websites in a similar and consistent fashion with similar content. (Page 18)

Recommendation 1.4 from the AAA Subcommittee - Stress the importance of MEAP grantees and utilities reaching out to past SER, HHC, and utility credit recipients to instruct them on how to apply for assistance if needed and notify those

customers that there are monthly utility assistance credits available for those who qualify. (Page 18)

Recommendation 3.2 from the Definitions Subcommittee – Update the Charge of the Definitions Subcommittee (Page 40)

Recommendation 4.1 from the O&E Subcommittee - Direct Staff to a) identify potential outreach partners among local community organizations, b) engage with those community organizations that are using the Commission's materials to solicit feedback regarding the efficacy of the materials, c) work with community organizations to identify information gaps, d) develop materials to help address these gaps. (Page 44)

Recommendation 4.2 from the O&E Subcommittee - Direct Staff to identify and build relationships with community organizations not typically part of utility or Commission communications. (Page 42)

Recommendation 4.3 from the O&E Subcommittee - Direct Staff to build trust through connections. (Page 42)

Recommendation 4.4 from the O&E Subcommittee - Coordinate outreach through the Commission's Communications Section and the LIEP Board. (Page 43)

Recommendations regarding reporting

Recommendation 1.5 from the AAA Subcommittee - Order utilities with an LIA credit (DTE Gas, Consumers Energy Electric and Gas, SEMCO, and Michigan Gas Utilities) to file the same LIA report as DTE Electric was ordered to file in Case No. U-20836. (Page 18)

Recommendation 2.1 from the DARR Subcommittee - Combine the U-20757 Report and Quarterly Report. (Page 26)

Recommendation 2.2 from the DARR Subcommittee - Require that utilities report arrearage data in the delinquency category that the balance accrued; add an additional arrearage category to the reporting template for arrearage amounts that are being written off. (Page 26)

Recommendation 2.3 from the DARR Subcommittee - Report shutoffs only as the total number of customers shutoff during the month as they are currently reported within the Quarterly Report. (Page 27)

Recommendation 2.4 from the DARR Subcommittee - Remove the occupied/unoccupied reporting metric within the U-20757 Report. (Page 28)

Recommendation 2.5 from the DARR Subcommittee - Add the total number of medical emergency denials and total number of critical care denials during the month to the monthly report; update the data reporting template. (Page 28)

Recommendation 2.6 from the DARR Subcommittee - Move towards collecting shutoff and arrearage data by zip code or census tract. (Page 29)

[Recommendation 2.7 from the DARR Subcommittee](#) - Add the number of customers restored within five days of being disconnected for nonpayment to the monthly report, then update the form with the metric and definition. (Page 30)

[Recommendation 2.8 from the DARR Subcommittee](#) - Open a new docket to review the Medical Certification Form approved under Case No. U-18479 and adopt the new protection. (Page 30)

[Recommendation 4.6 from the O&E Subcommittee](#) - Direct Communications Section Staff to provide updates at least annually to the LIEPB regarding the Commission's ongoing outreach and customer education efforts. (Page 43)

[Recommendation 4.7 from the O&E Subcommittee](#) - Direct Communications Section Staff to provide periodic updates to the members of the Outreach and Education Subcommittee. (Page 43)

Recommendations regarding language

[Recommendation 1.6 from the AAA Subcommittee](#) - Clarify the use of equity and centering impacted communities in energy assistance programming and analysis. (Page 18)

[Recommendation 3.1 from the Definitions Subcommittee](#) - Accept the recommended definition of energy affordability along with its companion document. This recommendation has been ratified by the LIEP Board. (Page 40)

[Recommendation 5.1 from the EWR-LI Workgroup](#) - Define "weatherization" for use across departments and sectors. (Page 47)

Additional recommendations

[Recommendation 2.9 from the DARR Subcommittee](#) - Encourage utilities that are not offering "other shutoff protection plans" to explore different payment plan options similar to other industry shutoff protection plans. (Page 31)

[Recommendation 2.10 from the DARR Subcommittee](#) - Order the creation of a critical care protection collaborative to discuss possible rule changes focusing on the critical care customer journey and detailing appropriate steps for a customer to seek assistance both at enrollment and renewal period and explore payment plan options for non-income-qualified customers prior to receiving recertification. (Page 31)

Recommendations Requiring Further Work

[Recommendation 1.8 from the AAA Subcommittee](#) - Staff to work with MDHHS in redefining crisis for energy assistance programs (LIHEAP & MEAP) and address the process of determining how critical care customers can receive assistance. (Page 19)

[Recommendation 1.16 from the AAA Subcommittee](#) - Provide additional training to frontline staff to better understand the impacts of EWR on affordability. (Page 23)

[Recommendation 1.17 from the AAA Subcommittee](#) - Create or identify a central platform for scheduling, logging, and tracking EWR referrals. (Page 23)

Recommendations for Groups Outside the MPSC

Administrative and cross-departmental recommendations

[Recommendation 1.7 from the AAA Subcommittee](#) - When assessing a customer's EWR needs—particularly those related to gas vs. electric appliances—there is a training opportunity to provide assistance workers with a deeper understanding of how and where to direct an EWR referral. Improved accuracy of referrals could lead to a more streamlined and efficient customer experience. (Page 19)

[Recommendation 1.10 from the AAA Subcommittee](#) - Eliminate energy co-pays or re-work interdependency in co-pays in the SER application. (Page 20)

[Recommendation 1.11 from the AAA Subcommittee](#) - Streamline and make more accessible energy assistance applications. (Page 20)

[Recommendation 1.13 from the AAA Subcommittee](#) - Offer option for virtual energy assessments. (Page 22)

[Recommendation 1.14 from the AAA Subcommittee](#) - Facilitate inter-agency coordination to assist customers with old bills or no billing history to obtain housing and new utilities at a new address. (Page 22)

[Recommendation 1.15 from the AAA Subcommittee](#) - Incorporate more flexibility in assistance programs for customers with higher usage and arrears. (Page 22)

[Recommendation 2.11 from the DARR Subcommittee](#) - Change the requirement mandating customers receiving the HHC be placed on the WPP. (Page 33)

[Recommendation 2.12 from the DARR Subcommittee](#) - Change the co-payments requirements within the Michigan Department of Health of Human Services assistance approval process. (Page 34)

[Recommendation 5.2 from the EWR-LI Workgroup](#) - Develop an office to serve as a nexus for energy efficiency and weatherization. (Page 47)

Recommendations that may require legislative change

[Recommendation 1.9 from the AAA Subcommittee](#) - Consider HHC approval for MEAP eligibility. (Page 20)

[Recommendation 5.3 from the EWR-LI Workgroup](#) - Explore opportunities to leverage Federal funding regarding deferral mitigation. (Page 47)

Recommendation regarding outreach

[Recommendation 1.12 from the AAA Subcommittee](#) - Provide additional outreach to assistance customers so they are aware of utility credits that may be available to them. (Page 22)

Conclusion

A key outcome of the work of the EAAC, EWR-LI Workgroup and the LIEPB is the education of stakeholders as wide ranging as utilities, human service agencies, advocacy and environmental groups, members of impacted communities, and state policy experts. The foundation provided over the past two years under the Commission's direction has brought a greater understanding of the challenges, stresses, and successes of vulnerable households in sustainably affording their energy bills. The collaboration, education, and informal dialogue have resulted in real-time changes to the current processes, especially to meet the needs of the most at-risk households, as well as strategies for longer term reform.

Staff recognizes that more work needs to be done and that the processes of redressing inefficient housing and moving the energy assistance and customer protection systems toward crisis prevention take time. To advance the long-term goal of system change focusing on the customer's ability to sustainably afford their home energy month after month will require ongoing collaboration with a wide range of partners.

The leadership of stakeholders in this process has been invaluable. Staff thanks the Commission for its commitment to stakeholder leadership and participation. Collaboration among the sectors serving vulnerable households as well as the customers with lived experience is pivotal to keeping customers safe and connected to energy and will buttress the effort to move from a crisis-based toward a prevention-based system.

Appendices

Appendix A - Index of Acronyms and Abbreviations

| Acronym/Abbreviation | Meaning |
|----------------------|---------------------------------------------------------------|
| A-16 | LIHEAP provision for self-sufficiency service funding |
| AAA | Affordability, Alignment, and Assistance Subcommittee of EAAC |
| AAAS | American Association for the Advancement of Science |
| ACEEE | American Council for an Energy Efficient Economy |
| AG | Attorney General |
| APP | Affordable Payment Plan |
| Assurance 16 | LIHEAP provision for self-sufficiency service funding |
| BCAEO | MDHHS Bureau of Community Action and Economic Opportunity |
| Board | Low-Income Energy Policy Board |
| CE | Consumers Energy |
| Commission | Michigan Public Service Commission |
| COSS | Cost of Service Study |
| DARR | Data Analysis and Regulatory Review Subcommittee of EAAC |
| DEI | Diversity Equity and Inclusion |
| DOE | U.S. Department of Energy |
| DOB | Date of Birth |
| DR | Demand Response |
| DTE | DTE Energy |
| EAAC | Energy Affordability and Accessibility Collaborative |
| EGLE | Michigan Department of Environment, Great Lakes, and Energy |
| EIBC | Energy Innovation Business Council |
| ENTF | Emergency Needs Task Force (Kent County) |
| EV | Electric Vehicle |
| EWR | Energy Waste Reduction |
| EWR-LI | Energy Waste Reduction Low-Income Workgroup |
| FPL | Federal Poverty Level |
| HARA | Housing Assessment and Resource Agency |
| HH | Household |
| HHC | Home Heating Credit |
| IRP | Integrated Resource Plan |
| LARA | Licensing and Regulatory Affairs |

| | |
|-------------|---------------------------------------------------------------------------|
| LEO | Michigan Department of Labor and Economic Growth |
| LIA | Low-Income Assistance Credits |
| LIEAF | Low-Income Energy Assistance Fund |
| LIEP | Low-Income Energy Policy |
| LIEPB | Low-Income Energy Policy Board |
| LIHEAP | Low-Income Home Energy Assistance Program |
| MDHHS | Michigan Department of Health and Human Services |
| MEAP | Michigan Energy Assistance Program |
| MEC | Midwest Energy & Communications |
| MI-Bridges | Michigan Bridges: assistance application portal run by MDHHS |
| MI-HOPE | Michigan Housing Opportunities Promoting Energy Efficiency Program |
| MI-MAUI | Michigan Municipal Association for Utility Issues |
| MPSC | Michigan Public Service Commission |
| MSHDA | Michigan State Housing Development Authority |
| NARUC | National Association of Regulatory Utility Commissioners |
| O&E | Outreach and Education Subcommittee of EAAC |
| PIPP | Percentage of Income Payment Plan (Pilot Program) |
| RIA | Residential Income Assistance |
| SDoH | Social Determinants of Health Strategy |
| SEMCO | SEMCO Energy Gas Company |
| SER | State Emergency Relief available through MDHHS |
| SMI | State Median Income |
| SNAP | Supplemental Nutrition Assistance Program |
| SPP | Shutoff Protection Program |
| SS/SSI/SSDI | Social Security/ Social Security Income/Social Security Disability Income |
| Treasury | Michigan Department of Treasury |
| UPPCO | Upper Peninsula Power Company |
| WAP | DOE Weatherization Assistance Program |
| WPP | Winter Protection Program |

Appendix B - Index of Webpages

| Reference or Resource | Webpage |
|-------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ACEEE State Scorecard | https://www.aceee.org/state-policy/scorecard |
| Affordability, Alignment, and Assistance Subcommittee | https://www.michigan.gov/mpsc/commission/workgroups/energy-affordability-and-accessibility-collaborative/affordability-alignment-assistance-subcommittee |
| Case No. U-18120 | https://mi-psc.force.com/s/case/500t0000008efylAAA/in-the-matter-on-the-commissions-own-motion-to-promulgate-rules-governing-the-billing-of-residential-and-nonresidential-electric-and-natural-gas-service |
| Case No. U-18479 | https://mi-psc.force.com/s/case/500t0000008eg4YAAQ/in-the-matter-of-the-application-of-michigan-public-utilities-for-approval-of-a-common-form-for-medical-certifications-under-customer-billing-rules |
| Case No. U-20140 | https://mi-psc.force.com/s/case/500t0000009fwSGAAY/in-the-matter-on-the-commissions-own-motion-regarding-extreme-weather-condition-policies-filed-in-compliance-with-michigan-administrative-code-r-460134 |
| Case No. U-20697 | https://mi-psc.force.com/s/case/500t000000PnlcRAAR/in-the-matter-of-the-application-of-consumers-energy-company-for-authority-to-increase-its-rates-for-the-generation-and-distribution-of-electricity-and-for-other-relief |
| Case No. U-20757 | https://mi-psc.force.com/s/case/500t000000UDcgYAAT/in-the-matter-on-the-commissions-own-motion-to-review-its-response-to-the-novel-coronavirus-covid19-pandemic-including-the-statewide-state-of-emergency-and-to-provide-guidance-and-direction-to-energy-and-telecommunications-providers-and-other-stak |
| Case No. U-20836 | https://mi-psc.force.com/s/case/500t000000WH1HKAA1/in-the-matter-of-the-application-of-dte-electric-company-for-authority-to-increase-its-rates-amend-its-rate-schedules-and-rules-governing-the-distribution-and-supply-of-electric-energy-and-for-miscellaneous-accounting-authority |
| Case No. U-20875 | https://mi-psc.force.com/s/case/500t000000Y0QxcAAF/in-the-matter-on-the-commissions-own-motion-regarding-the-regulatory-reviews-revisions-determinations-andor-approvals-necessary-for-consumers-energy-company-to-fully-comply-with-public-act-295-of-2008-as-amended-by-public-act-342-of-2016 |
| Case No. U-20876 | https://mi-psc.force.com/s/case/500t000000Y0Qz9AAF/in-the-matter-on-the-commissions-own-motion-regarding-the-regulatory-reviews-revisions-determinations-andor-approvals-necessary-for-dte-electric-company-to-fully-comply-with-public-act-295-of-2008-as-amended-by-public-act-342-of-2016 |
| Case No. U-20881 | https://mi-psc.force.com/s/case/500t000000Y0QpiAAF/in-the-matter-on-the-commissions-own-motion-regarding-the-regulatory-reviews-revisions-determinations-andor-approvals-necessary-for-dte-gas-company-to-fully-comply-with-public-act-295-of-2008-as-amended-by-public-act-342-of-2016 |
| Case No. U-20940 | https://mi-psc.force.com/s/case/500t000000dR1s4AAC/in-the-matter-of-the-application-of-dte-gas-company-for-authority-to-increase-its-rates-amend-its-rate-schedules-and-rules-governing-the-distribution-and-supply-of-natural-gas-and-for-miscellaneous-accounting-authority |
| Case No. U-20959 | https://mi-psc.force.com/s/case/500t000000e8lp8AAA/in-the-matter-on-the-commissions-own-motion-to-commence-a-collaborative-to-consider-issues-related-to-further-engagement-education-and-participation-of-utility-customers |

| | |
|------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Case No. U-20963 | https://mi-psc.force.com/s/case/500t000000e99lpAAI/in-the-matter-of-the-application-of-consumers-energy-company-for-authority-to-increase-its-rates-for-the-generation-and-distribution-of-electricity-and-for-other-relief |
| Case No. U-21150 | https://mi-psc.force.com/s/case/500t000000sDP7hAAG/in-the-matter-on-the-commissions-own-motion-to-propose-revision-to-the-rules-governing-consumer-standards-and-billing-practices-of-electric-and-natural-gas-utilities-regulated-in-accordance-with-1919-pa-419-as-amended-1939-pa-3-as-amended-and-1965 |
| Definitions for U-20757 Residential Data Submissions | https://www.michigan.gov/-/media/Project/Websites/mpsc/regulatory/reports/U-20757_Data_Template_and_Definitions.pdf |
| Energy Affordability and Accessibility Collaborative | https://www.michigan.gov/mpsc/commission/workgroups/energy-affordability-and-accessibility-collaborative |
| Energy Waste Reduction Low-Income Workgroup | https://www.michigan.gov/mpsc/commission/workgroups/low-income-workgroup |
| Get Help | https://www.michigan.gov/mpsc/consumer/get-help |
| Low Income Energy Policy Board | https://www.michigan.gov/mpsc/commission/workgroups/low-income-energy-policy-board |
| MI-Bridges Application Tool | https://newmibridges.michigan.gov/s/isd-landing-page?language=en_US |
| MI EJ Screening Tool | https://www.michigan.gov/egle/maps-data/miejscreen |
| MI Healthy Climate Plan | https://www.michigan.gov/egle/about/organization/climate-and-energy/mi-healthy-climate-plan |
| MI Hope Program | https://www.michigan.gov/mshda/neighborhoods/mi-housing-opportunities-promoting-energy-efficiency-program-mi-hope |
| Michigan Energy Assistance Program | https://www.michigan.gov/mpsc/consumer/energy-assistance |
| Poverty Task Force Report | https://www.michigan.gov/leo/-/media/Project/Websites/leo/Folder16/22-LEO-0478-PTF-PrePress.pdf?rev=51b9bc0497124d4ba6bf66b038116310&hash=6F6980B98B170068455E364C02F05799 |
| Utility Customer Data | https://www.michigan.gov/mpsc/regulatory/reports/other/utility-customer-data |

Appendix C – Quarterly Report

MPSC - Reporting Requirement (Quarterly Reports)

Timing: R 460.151 Reporting requirements. Rule 51. A utility shall file with the commission quarterly reports that disclose all of the following. Data is for all customer types unless specified. Submission is required 45 days following the end of the identified quarter. The filing will encompass the previous quarter's information. If the 45th day falls on a weekend or a holiday, then the completed template shall be filed on the first business day following the weekend or holiday.

| Customer Service | | Data Representation |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| R 460.151 Reporting requirements. Rule 51. A utility shall file with the commission quarterly reports that disclose all of the following:(b) The number and general description of all complaints registered with the utility. | | |
| A. | The number of contacts the company receives from customers about their utility service. Contacts can come in any form. Contacts would include all complaints and inquiries. | Total for month |
| B. | A complaint means a customer driven contact where corrective action occurs to resolve the matter. - The Commission does not deem requests for information, service, routine information or explanation as a complaint. The Commission is aware that a customer may not be satisfied but accepts the utility information, explanation or verification. A complaint can be resolved on the first call. | Total for month |
| a. | Corrective action that relates directly to a customer billing dispute. | Total for month |
| b. | Corrective action that relates directly to a customer "service" dispute. | Total for month |
| c. | Corrective action that relates directly to a customer credit or collections of the account. | Total for month |
| d. | Corrective action that relates to other areas of concern not listed above. | Total for month |
| e. | Provide a description of "other" areas of concern. | |
| Customer Payment Performance | | Data Representation |
| R 460.151 Reporting requirements Rule 51. A utility shall file with the commission quarterly reports that disclose all of the following:(a) The payment performance of its customers in relation to established due and payable periods- Data reflects all customer types.- Data will not be collected for customers who remain unpaid from 5-30 days in this report.- Day range reflects the true number (ex: Customer is in arrears on day 60, on the last day of the month, the customer would be placed within the 31-60 bucket).- Count the customer in the oldest age of arrears (ex: If a customer is delinquent over 91 days and over, customer should only appear in the 91 day and over bucket NOT in 31 or 61).- Final arrears should be included in the 91 and over. | | |
| C. | The total number of customers who paid the amount owed by their scheduled due date. | Total for month |
| D. | An account with charges for utility service that remains unpaid 31 -60 days after the due date. (R 460.102 (m)) | As of the last day of the month |
| E. | An account with charges for utility service that remains unpaid 61 - 90 days after the due date. (R 460.102 (m)) | As of the last day of the month |
| F. | An account with charges for utility service that remains unpaid 91 days or more after the due date. (R 460.102 (m)) | As of the last day of the month |
| Payment Plans and Settlements | | Data Representation |
| G. | The number of customers who have entered into a written agreement to settle a dispute and may include to pay back on a unpaid balance over a duration of time. (R 460.158) | Total for month |
| H. | The number of customers who have entered into an agreement to pay back an unpaid balance over a duration of time. Arrangements can be verbal. (R 460.146) | Total for month |
| Winter Protection Plan (WPP) | | Data Representation |
| I. | The number of customers who are classified under Winter Protection Plan. (R 460.131) | Total for month |
| J. | The number of customers who defaulted on the program. (R 460.131) | Total for month |
| Alternative Shutoff Protection Plan | | Data Representation |
| K. | The total number of customers who are classified under Shutoff Protection Plan (R 460.131(10)) | Total for month |

Appendix D – EAAC DARR Subcommittee Processes and Membership

Leadership

The DARR subcommittee is co-chaired by Christina Forist, Manager and Jake Thelen, Department Specialist both within the Compliance and Investigation Section of the MPSC; Rick Bunch, Senior Consultant with 5 Lakes Energy; and Kasey Grieco, Assistant Program Manager with Superior Watershed Partnership. Subcommittee leaders serve in a voluntary capacity.

Membership

DARR recruited its members through announcements made by other EAAC subcommittees and the EWR-LI Workgroup. DARR benefitted from the diversity of expertise of approximately 55 participants from government agencies (MPSC, MDHHS, Treasury, EGLE, and the Governor's Office), human service agencies, advocacy groups (low-income, environmentalists, and economists), and utility representatives. Each member was provided the subcommittee's charge, agenda, and timeline encouraging them to forward the information to other interested parties. Refer to Appendix D for a list of subcommittee members that registered with the original listserv.

Meeting Cadence

The DARR subcommittee met the third Tuesday of each month from 10:00 a.m. – 12:00 p.m., from March through September 2022, to address the charges outlined above. The charge the Commission put forth focuses on two parts: 1) Data Analysis and 2) Regulatory Review of Billing Rules.

Meeting Content

During the initial meeting DARR discussed the goal and charge of the workgroup. Over the next two meetings data points in the U-20757 Report and Quarterly Report were presented and compared. DARR also discussed any potential data points that are not currently collected but would be useful in the future.

Following the data discussions, DARR met to review customer protections in the current Billing Rules. During these meetings DARR discussed the current rules to gain a holistic understanding of customer protections under these rules. These meetings included presentations from Staff and utilities. Data was requested by DARR co-chairs to demonstrate current use of the protections and discuss whether there is room for change or improvement.

The final two meetings provided DARR with customer insight from lived experiences. This insight enhanced the subcommittee's discussions leading to recommendations.

Feedback

DARR leadership used various methods to collect input and feedback from the group including surveys, a suggestion box and email correspondence with the co-chairs. On May 4th Staff sent out a survey to all workgroup participants following the review of the U-20757 Report and Quarterly Report. The survey consisted of the following questions:

4. What additional data points would you like to see collected?
5. Do you think any of the current data points should be removed? Please list the data point and why you think it should be removed.
6. How would you improve the U-20757 and Quarterly Report data accessibility?
7. How do you plan on using the data?
8. If you are not currently involved in the DARR workgroup, please provide your email address and an invite will be sent to you.

DARR also used a suggestion box, <https://www.michigan.gov/mpsc/commission/workgroups/energy-affordability-and-accessibility-collaborative> to gather feedback. The suggestion box was available throughout the workgroup process.

Prior to the subcommittee's September meeting regarding recommendations, an email request was sent to all DARR members encouraging them to provide additional insight while allowing them to be anonymous.

Membership

| | |
|------------------|------------------------|
| Richard Bunch | 5 Lakes Energy, LLC |
| Douglas Jester | 5 Lakes Energy, LLC |
| Martin Kushler | ACEEE |
| Amy Bandyk | Citizens Utility Board |
| Zoe Ahlstrom | Consumers Energy |
| Nicholas Cross | Consumers Energy |
| Tricia Eddy | Consumers Energy |
| Keegan Gendron | Consumers Energy |
| Shawn Hurd | Consumers Energy |
| Lynne McCollum | Consumers Energy |
| Antonette Noakes | Consumers Energy |
| Kahryn Riley | Consumers Energy |
| Dina Shearhouse | Consumers Energy |
| Jaclyn Hulst | Customer |
| Kevin Bilyeu | DTE Energy |
| John Boladian | DTE Energy |

| | |
|---------------------|-------------------------------------------------------------|
| Maria Christian | DTE Energy |
| Denise Diz | DTE Energy |
| Tiffany Loveberry | DTE Energy |
| Jennifer Schmidt | DTE Energy |
| Noah Purcell | ICF |
| Ben Gulker | Michigan Department of Health and Human Services |
| Cartyea Mathies | Michigan Department of Health and Human Services |
| Erin Mobley | Michigan Department of Health and Human Services |
| Molly Welch-Marahar | Michigan Department of Health and Human Services |
| Dan Dudas | Michigan Electric and Gas Association |
| Jessica Crawford | Michigan Department of Environment, Great Lakes, and Energy |
| Lisa Thomas | Michigan Department of Environment, Great Lakes, and Energy |
| Shannon Burzycki | Michigan Gas Utilities |
| Tiffany Fillmore | Michigan Gas Utilities |
| Anne Armstrong | Michigan Public Service Commission |
| Brad Banks | Michigan Public Service Commission |
| Elaina Braunschweig | Michigan Public Service Commission |
| Nathan Burnand | Michigan Public Service Commission |
| Al Freeman | Michigan Public Service Commission |
| Christina Forist | Michigan Public Service Commission |
| Kayla Gibbs | Michigan Public Service Commission |
| Karen Gould | Michigan Public Service Commission |
| Shannon Hartman | Michigan Public Service Commission |
| Sarah Mullkoff | Michigan Public Service Commission |
| Katie Smith | Michigan Public Service Commission |
| Jake Thelen | Michigan Public Service Commission |
| Mary Wilkins | Michigan Public Service Commission |
| Annika Brindel | National Housing Trust |
| Derrell Slaughter | NRDC |
| Laura Goldberg | NRDC |
| Sam Whillans | NRDC |
| Tom Page | River Star |

| | |
|---------------|-------------------------------|
| Katie Wood | Salvation Army |
| Jen Dennis | Semco Energy |
| Ryan Houck | Semco Energy |
| Patrick Leahy | Semco Energy |
| Laurie Owens | Semco Energy |
| Kasey Grieco | Superior Watershed |
| Tonya Swenor | Superior Watershed |
| Jodi Formolo | Upper Peninsula Power Company |

Appendix E – Medical Emergency and Critical Care Data

Medical emergency and critical care data request: 2019-2021 data reflects the number of customers participating in the protection, denials, and arrearage. (Note: outlines specific utilities as not all utilities track this specific information)

| Medical Emergency | | 2019 | Utilities |
|------------------------------|-------------------------------------------------------------------------------------------------------------|----------------|---------------------------------------------|
| Number of customers enrolled | How many protections granted throughout the entire year ***One customer could be counted up to six times*** | 3,464 | CE, DTE, I&M, MGU, Semco, UMER, UPPCO, Xcel |
| Number of customers denied | May be pulled manually, or may not even exist | 4,765 | CE, DTE, UPPCO, Xcel |
| Total dollars in arrears | Dollars in arrears as of March 31 of each year | \$4,271,751.37 | CE, DTE, Semco, Xcel |
| Critical Care | | 2019 | Utilities |
| Number of customers enrolled | How many granted throughout the entire year | 973 | CE, DTE, I&M, MGU, UPPCO, Xcel |
| Number of customers denied | May be pulled manually, or may not even exist | 320 | CE, DTE, I&M, Xcel |
| Total dollars in arrears | Dollars in arrears as of March 31 of each year | \$544,142.11 | DTE, Xcel |

| Medical Emergency | | 2020 | Utilities |
|------------------------------|--------------------------------------------------------------------------------------------------|----------------|-----------------------------------------------|
| Number of customers enrolled | How many granted throughout the entire year. ***One customer could be counted up to six times*** | 1,096 | Alpena, CE, DTE, I&M, MGU, Semco, UPPCO, Xcel |
| Number of customers denied | May be pulled manually, or may not even exist | 1,649 | CE, DTE, UPPCO, Xcel |
| Total dollars in arrears | Dollars in arrears as of March 31 of each year | \$1,440,216.57 | CE, DTE, Semco, Xcel |

| Critical Care | | 2020 | Utilities |
|------------------------------|------------------------------------------------|--------------|-----------------------------------|
| Number of customers enrolled | How many granted throughout the entire year | 449 | Alpena, CE, DTE, I&M, UPPCO, Xcel |
| Number of customers denied | May be pulled manually, or may not even exist | 211 | CE, DTE, I&M, Xcel |
| Total dollars in arrears | Dollars in arrears as of March 31 of each year | \$440,289.21 | DTE, Xcel |

| Medical Emergency | | 2021 | Utilities |
|------------------------------|----------------------------------------------------------------------------------------------------|----------------|-----------------------------------------------------|
| Number of customers enrolled | How many granted throughout the entire year ***One customer could be counted up to six times*** | 1,061 | Alpena, CE, DTE, I&M, MGU, Semco, UMER, UPPCO, Xcel |
| Number of customers denied | May be pulled manually, or may not even exist | 1,615 | CE, DTE, I&M, UPPCO |
| Total dollars in arrears | Dollars in arrears as of March 31 of each year | \$1,659,499.26 | CE, DTE, Semco, Xcel |

| Critical Care | | 2021 | Utilities |
|------------------------------|------------------------------------------------|----------------|----------------------------------------------|
| Number of customers enrolled | How many granted throughout the entire year | 476 | Alpena, CE, DTE, I&M, MGU, UMER, UPPCO, Xcel |
| Number of customers denied | May be pulled manually, or may not even exist | 235 | CE, DTE, I&M, Xcel |
| Total dollars in arrears | Dollars in arrears as of March 31 of each year | \$1,140,708.47 | CE, DTE, Xcel |

Appendix F – Medical Certification Form: Sample of added protection

| Section 3: the following information is to be completed by a Physician or Public Health Official | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Patients Name: (same as Section 1) | Birthdate: |
| Please Select One of the following conditions by checking one of the boxes below: | |
| <input type="checkbox"/> | Medical Emergency Patient <i>Patient suffers from an existing medical condition that will be aggravated by the lack of utility service. A utility shall postpone disconnection for no longer than 21 days if the customer or member of customer's household has a certified medical emergency. Please note, additional certificates are required to extend postponement of shutoff. Postponement of shutoff for medical emergency conditions shall not exceed 63 days.</i> |
| <i>I certify that the patient has the following medical emergency condition(s) that will be aggravated by the loss of electricity and/or natural gas service.</i> | |
| Condition(s): | |
| | |
| | |
| Equipment: | Time Period: |

Appendix G – Critical Care

Critical care protection data request: 2019-2021 data reflects the number of customers participating that currently have an outstanding balance at the end of the physical year. The customer is designated to their arrearage based on dollar amounts.

Consumers Energy

| DARR Billing Rule Data Request - Critical Care | | |
|------------------------------------------------|--------|---------------|
| 2019 | # Cust | Total Arrears |
| Credit | 11 | -\$2,013.64 |
| Zero | 117 | \$0.00 |
| >0, <1,000 | 100 | \$39,458.68 |
| >1,001, <10,000 | 70 | \$167,060.64 |
| >=10,001 | 4 | \$57,879.58 |
| Total | 302 | \$262,385.26 |
| 2020 | # Cust | Total Arrears |
| Credit | 8 | -\$333.01 |
| Zero | 84 | \$0.00 |
| >0, <1,000 | 67 | \$28,276.60 |
| >1,001, <10,000 | 72 | \$216,828.55 |
| >=10,001 | 3 | \$38,297.79 |
| Total | 234 | \$283,069.93 |
| 2021 | # Cust | Total Arrears |
| Credit | 3 | -\$122.62 |
| Zero | 42 | \$0.00 |
| >0, <1,000 | 29 | \$10,001.19 |
| >1,001, <10,000 | 17 | \$77,612.12 |
| >=10,001 | 0 | \$0.00 |
| Total | 91 | \$87,490.69 |

DTE Energy

| DARR Billing Rule Data Request - Critical Care | | |
|------------------------------------------------|--------|---------------|
| 2019 | # Cust | Total Arrears |
| Credit | 0 | \$0.00 |
| Zero | 40 | \$0.00 |
| >0, <1,000 | 28 | \$10,053.35 |
| >1,001, <10,000 | 130 | \$541,209.00 |
| >=10,001 | 12 | \$222,325.48 |
| Total | 210 | \$773,587.83 |
| 2020 | # Cust | Total Arrears |
| Credit | 0 | \$0.00 |
| Zero | 30 | \$0.00 |
| >0, <1,000 | 12 | \$5,177.91 |
| >1,001, <10,000 | 63 | \$321,937.11 |
| >=10,001 | 17 | \$311,132.85 |
| Total | 122 | \$638,247.87 |
| 2021 | # Cust | Total Arrears |
| Credit | 0 | \$0.00 |
| Zero | 42 | \$0.00 |
| >0, <1,000 | 35 | \$11,699.84 |
| >1,001, <10,000 | 79 | \$367,629.29 |
| >=10,001 | 32 | \$561,141.36 |
| Total | 188 | \$940,470.49 |

Appendix H – Optional Winter Protection Plan

Utilities outline their Optional Winter Protection Plan “Shutoff Protection Plan” within their tariff.

CE Tariff Electric (same in natural gas)

C5.4 Shutoff Protection Plan for Residential Customers

Eligibility

Eligible low-income customers and senior citizen customers may choose to participate in the Shutoff Protection Plan (SPP) in lieu of the applicable Winter Protection Plan as described in Rule B2., Consumer Standards and Billing Practices for Electric and Natural Gas Service, R 460.131, Winter Protection Plan for Eligible Low-Income Customers, or R 460.132, Winter Protection Plan for Eligible Senior Citizen Customers. For purposes of this Company rule, an eligible low-income customer means a utility customer who has not had more than one default condition on the SPP in the last twelve months and whose household income does not exceed 200% of the federal poverty guidelines as published by the United States Department of Health and Human Services or who receives supplemental security income or low-income assistance through the Department of Human Services or successor agency, food stamps, or Medicaid. In addition, an eligible senior citizen customer means a utility customer who has not had more than one default condition on the SPP in the last twelve months, is 65 years of age or older, and advises the utility of his or her eligibility. An eligible customer enrolled in the SPP shall be referred to as an SPP Customer. Customers may become eligible for a modified SPP as provided for in Rule C5.4. B.

Enrollment

An eligible customer may enroll at any time of the calendar year in the SPP. Where unauthorized use of utility service has not occurred, to enroll an eligible customer must (1) contact the Company and indicate that they wish to enroll, (2) be able to demonstrate that he or she has made application for state or federal heating assistance, or has a household income that does not exceed 200% of the federal poverty guidelines as published by the United States Department of Health and Human Services or receives supplemental security income or low-income assistance through the Department of Human Services or successor agency, food stamps, or Medicaid, (3) within 14 days of a customer calling to enroll in the SPP, have completed the enrollment process by paying a minimum down payment of 10% of the total amount owed to the Company at the time of the request to enroll. An eligible customer is not enrolled in the SPP until the enrollment requirements are fulfilled. Customers previously enrolled in the SPP the last twelve months who default may be permitted to re-enroll in a modified SPP payment arrangement, at the discretion of the Company, if they have demonstrated a willingness to satisfy the terms of the payment plan through their payment history or have received assistance that will improve the customer's ability to satisfy the payment

arrangements. The modified SPP repayment period shall not exceed 24 months. Customers who enroll in the SPP who have not been enrolled in the SPP for more than twelve months may not be required to pay a deposit or reconnection fee, if applicable.

Customers who enroll in the SPP who were previously enrolled in the SPP in the last twelve months and removed due to default may be required to pay a deposit and a reconnection fee, if applicable.

Where unauthorized use of utility service has occurred, the customer must pay 100% of the portion of charges that are the result of the unauthorized use. Upon receipt of payment, the customer shall be considered eligible if all other eligibility requirements are met. The customer may then enroll under the conditions described previously. The payment of unauthorized use charges may be made at the same time as the down payment of the total amount owed to the Company is made. In the event that the down payment of the total amount owed to the Company is made without payment of the unauthorized charges at the same time or previously, the payment received shall first be applied to the unauthorized charges.

In the event that an eligible customer has contacted the Company to indicate a wish to enroll but the requirements so described are not met in full, the eligible customer shall then be subject to credit action as though no contact with the Company had occurred. In the event that all Company obligations to shutoff service have been met, the eligible customer shall receive a minimum of one communication at least 24 hours prior to shutoff of service.

Customer Protection

Once enrolled in the SPP, a utility shall not shutoff service to a SPP Customer if the customer pays to the Company a monthly amount equal to 1/12th of the estimated annual bill for the SPP Customer and a Company-specified amount between 1/12th and 1/24th of any remaining delinquent balance owed to the Company at the time of the enrollment. The Company shall have the right to deny or shutoff service in accordance with Rules and Regulations of the Company as authorized by the Michigan Public Service Commission outlined in Rule C1.3, Use of Service and in Rule C5.1, Access to Customer's Premises. While the customer is enrolled in the SPP and payments are made by the due date of the amount due shown on the bill, no late payment charges will be assessed. The SPP Customer may participate in the SPP for a maximum period of 24 months or until the delinquent charges are eliminated and the SPP Customer is able to pay his or her regular monthly energy bills.

The estimated annual bill for the SPP Customer and the delinquent balance due may be recalculated periodically by the Company. The Company may also recalculate the estimated annual bill and the delinquent balance due upon the transfer of a balance owed on another account in compliance with Rule B2., Consumer Standards and Billing Practices for Electric and Natural Gas Service.

Default

Should a SPP Customer fail to make payment by the due date, a shutoff notice specific to this SPP shall be issued but shall comply with the requirements of Part 8 of Rule B2., Consumer Standards and Billing Practices for Electric and Natural Gas Service. If the SPP Customer makes payment before the date provided for shutoff of service, the customer shall not be considered to be in default but shall remain in the SPP. If the SPP Customer makes payment after this date, the SPP Customer shall be in default and shall be removed from the SPP. The customer shall be subject to shutoff, provided the 24-hour notice was made by the Company.

Participation in Other Shutoff Protection Plans

Customers eligible to participate under the Winter Protection Plan, Rules R 460.131 and R 460.132, will be required to waive their rights to participate under the Winter Protection Plan in order to participate in the alternative Shutoff Protection Plan. Upon enrollment, the Company shall send written confirmation of the enrollment terms and include notice of this provision.

DTE Energy Electric (same in natural gas)

C4.10 Alternative Shut-Off Protection Program for Eligible Low-Income and Senior Citizen Customers

A. As used in Section C4.11:

(1) "Eligible customer" means either a Low-income or Senior citizen customer whose arrearage has not accrued as a result of theft or unauthorized use.

(2) "Low-income customer" means a utility customer whose household income is at or below 200% of the Federal Poverty Level (FPL) and provides proof of meeting the eligibility requirement at the time of enrollment.

(3) "Senior citizen customer" means a utility customer who is 62 years of age or older and provides proof of meeting the eligibility requirement at the time of enrollment.

B. Customers eligible to participate under the Winter Protection Plan, Rules R460.148 and R460.149, will be required to waive their rights to participate under the Winter Protection Plan in order to participate under the Alternative Shut-off Protection Program for Eligible Low-Income and Senior Citizen Customers, Section C4.11.

C. Eligible customers may enroll year-round. Once enrolled, Eligible customers will be required to pay a minimum payment of 10% of the total balance of the amount owing at the time of enrollment and minimum monthly payments that include 1/12 of any remaining arrearage balance plus 1/12 of the estimated annual bill. Reconnection fees will be waived upon initial enrollment. Eligible customers will not be subject to late fees or deposits while enrolled in the program. The Company may elect to offer the customer additional time to resolve the arrearage resulting in an extended payment plan up to 24 months.

D. Eligible customers' electric service will not be shutoff while enrolled in the program. In the event that the customer defaults by failing to pay the required minimum payment of 10% of the total balance owing at the time of enrollment or fails to make one monthly payment, the customer's participation in the program will be terminated and the customer's utility service will be subject to shutoff. The customer will remain responsible for the full arrearage and all applicable charges permitted under the tariffs including, but not limited to late fees, deposits and applicable reconnect charges. Customers previously terminated from the program will be permitted to enroll one additional time within any 12-month period if the customer pays 20% of any balance due plus reconnection charges and otherwise meets the requirements of the program.

Appendix I – Extreme Weather Policy

Extreme Weather Policy data reflects data from 2019-2021 on the number of days the policy was activated.

| DARR Billing Rule Data Request - Extreme Weather Policy | | | |
|---------------------------------------------------------|--------------|--------------|--------------|
| Number of days policy was activated | | | |
| Utilities | 2019 | 2020 | 2021 |
| Alpena Power | Not Tracked | Not Tracked | Not Tracked |
| Consumers Energy | 9 | 1 | 6 |
| DTE Energy | 6 | 0 | 0 |
| Indiana Michigan Power | 67 | 43 | 49 |
| Michigan Gas Utilities | Not Tracked | Not Tracked | Not Tracked |
| Semco Energy | 27 | 8 | 15 |
| Upper Michigan Energy Resource Corp | Moratorium | Moratorium | Moratorium |
| Upper Peninsula Power (UPPCO) | Not Tracked* | Not Tracked* | Not Tracked* |
| Xcel Energy | Not Tracked | Not Tracked | Not Tracked |

* UPPCO did not track how many days the policy was enacted but did not disconnect in Jan-Feb-Dec 2019; Jan-most of Feb 2020; Jan-Feb 2021. Each December there were few disconnections, and each summer may have had a handful of days with extreme weather when disconnections were not performed.

Appendix J – LIEP Board Retreat Workbook Sept. 26, 2022

| Retreat Purpose and Goal |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> To guide the process of assessing energy affordability and accessibility holistically, especially through linking energy waste reduction services and energy assistance programs. To reduce the number of households with unsustainable energy burdens. |

| Sponsors | | |
|---------------------|------------------------------------------------------------------------|---------------|
| Authoring Sponsors: | | |
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| Mary Wilkins | Wilkinsm3@michigan.gov | (517)248-8193 |
| Anne Armstrong | ArmstrongA3@michigan.gov | (517)284-8162 |

| Sponsor Expected Outcomes |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Develop goals around the pillars of Data Access & Regulatory Review; Workforce; Health & Safety; and Affordability Alignment & Assistance. Strategies to meet these goals will be developed at the Low-Income Energy Summit, to be held in November 2022. |

| Facilitators | | |
|-----------------------|----------------------------------------------------------------------------|----------------|
| Name | Email | Telephone |
| Jaclyn Badder | BadderJ@michigan.gov | (517) 243-7110 |
| Trinidad Pehlivanoglu | PehlivanogluT@michigan.gov | (517) 643-6545 |

| Focus Group Participants | | |
|--------------------------|-----------------------------------|-----------|
| Participants: | | |
| Name | Organization | Workgroup |
| Anne Armstrong | MPSC | C |
| Brad Banks | MPSC | B |
| Andrew McNeally | UPPCO | A |
| Rick Bunch | 5 Lakes Energy; MI-MAUI | C |
| Alexis Blizman | Ecology Center | B |
| Briana DuBose | EcoWorks Detroit | B |
| Martin Kushler | ACEEE | C |
| Patrick Leahy | SEMCO Energy Gas Co. | A |
| Kasey McNeally | Superior Watershed | C |
| Briana Parker | Elevate | A |
| Wende Randall | Kent County ENTF | A |
| Cory Connolly | Department of Environment, GLE | B |
| Rachael Eubanks | Department of Treasury | D |
| Jeff Guilfoyle | Department of Treasury | C |
| Hassan Hammoud | Michigan 211 | D |

| | | |
|-----------------------|-----------------------------------|---|
| Kelly Rose | MSHDA | B |
| Jerin Philip | DHHS | B |
| Derrell Slaughter | National Resource Defense Council | A |
| Elaina Braunschweig | MPSC | D |
| Jamie Curtis | MPSC | D |
| Christina Forist | MPSC | C |
| Reka Holley Voelker | MPSC | B |
| Shatina Jones | MPSC | A |
| Amy Rittenhouse | MPSC | A |
| Jake Thelen | MPSC | C |
| Mary Wilkins | MPSC | D |
| Synia Grant-Jordan | | A |
| Latasha Hannah | | D |
| Nicole Denson-Sogbaka | DHHS | D |

Brainstormed List of Considerations

- Category: [Data Access & Regulatory Review](#)

- Discussion on how to integrate energy assistance, WER, shutoffs and arrearages
- Are there ways to integrate EWR into customer protection rules?
- Discussion of shutoff protection plans and winter protection plan
- More flexibility in payment plans required in rules
- Allow customers to get assistance even with co-pays
- Data tracking WER and energy assistance linkage of services
- Critical care and medical care protections: how to get assistance when on these protections.

- Category: [Workforce](#)

- Who (departments) has funding?
- What are skills certifications?
- What are requirements of work (home enhancement)?
- What are needs (barriers) of workers (potential workers)?
- By geography:
 - What number of jobs will be (are) available?
 - What jobs (types) are available?
 - Who are the businesses (utilities, contractors) that are hiring?
- What various partnerships can be formed?
 - Utilities
 - Municipalities
 - State Departments
 - Training Orgs (trades unions and area community colleges)
 - Barrier resolution (transportation, housing)
- Who owns the information, goals, accountability?
 - Establish position/department
- Who do we need to advocate to?

| |
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| <ul style="list-style-type: none"> • Category: Health & Safety <ul style="list-style-type: none"> • Audit for all state agencies on available funding for energy rehab to coordinate and fill gaps between programs • Ombudsman to coordinate effort • Data is key • Carbon impact of reducing deferrals • Energy cost reduction • Change in medical use • Home heating <ul style="list-style-type: none"> ○ Money for deferral reduction ○ Complete departmental audit of all programs that touch housing energy • Monetize benefit of ID data needed – find out where housed <ul style="list-style-type: none"> ○ MDHHS ○ MSHDA ○ Utility • Data links to Medicaid • Linking to other states data • At what point do the investments break even • Housing stability • Monetize health impacts • Measurables |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| Quick Wins |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Category: Workforce <ul style="list-style-type: none"> • Document and share success stories of people in energy efficiency/weatherization jobs. • Share best practices (such as “We want Green Too program”) <ul style="list-style-type: none"> ○ Naomi Davis – Blocks In Green |
| <ul style="list-style-type: none"> • Category: Affordability Alignment & Assistance <ul style="list-style-type: none"> • Customers who receive RIA should receive EWR referral. • Utilities should advertise assistance offerings on their websites. |

| Developed Goals |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Category: Data Access & Regulatory Review <ul style="list-style-type: none"> • Improve the functionality and accessibility of customer related data • Use data to better understand customer experience to allow for integration of energy assistance, energy waste reduction services and customer protections |
| <ul style="list-style-type: none"> • Category: Workforce <ul style="list-style-type: none"> • Inventory/understand job types, number of jobs, certification/skills, and hiring organizations by geography, across the state. <ul style="list-style-type: none"> ○ Establish skills training & partnerships learning/working on real-time projects (benefit community buildings and area workers. ○ Reduce gap between workforce needs and workers (candidates) ○ Achieve ___% BIPOC workers |

| |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Build relationships and connections between all stakeholder organizations and community residents (including people with ____ experience to the types of jobs.) |
| <ul style="list-style-type: none"> • Category: Health & Safety <ul style="list-style-type: none"> • Identify types of data needed • Where do we retrieve data from – DHHS? • Develop relationships • Health Impacts • How to identify the value <ul style="list-style-type: none"> ○ Energy cost reduction ○ Medicaid costs ○ School absences • What is the dollar amount to fund the deferrals <ul style="list-style-type: none"> ○ LIHEAP Data needed for legislative change ○ What are carbon impacts for reducing deferrals – DOE targets |
| <ul style="list-style-type: none"> • Category: Affordability, Alignment, & Assistance <ul style="list-style-type: none"> • Redefine crisis to include critical care and medical hold customers with accruing arrears or those with documented health & safety deferrals. • Consider HHC approval for MEAP eligibility. • Eliminate energy co-pays or re-work interdependency in co-pays in the SER application. • DHHS list of confirmed income-eligible customers denied for other reasons. |

| Questions and Comments from Report Out |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Category: Data Access & Regulatory Review <ul style="list-style-type: none"> • Governor has an effort underway that we might be able to leverage. • Is there a comparison chart for data that has been collected up until now? What did the data prove? How much was spent? More money spent on data than solutioning. Historical problem, what are the real measurable outcomes? <ul style="list-style-type: none"> ○ There is no comparison of cost vs outcomes. • How do we incorporate anecdotal data? There was previously an effort toward affordability data. |
| Category: Workforce <p>Work is interrelated. How do we as a board continue to link this work to our overall goal of increasing the number of households who can sustain, afford their bills?</p> <ul style="list-style-type: none"> • Build awareness of what residents can do themselves. Basic home improvements. • Open door to apprenticeships for interested residents to build skills and improve overall situation. • Once numbers/data are identified we can move on these ideas. • Great to see a priority placed on weatherization. |
| Category: Health & Safety <ul style="list-style-type: none"> • List of priorities – data linkage/Medicaid beneficiaries/ health & safety issues <ul style="list-style-type: none"> ○ Data available from other states? ○ Cost benefit analysis ○ How to measure quality of life aspects – quantifiable/monetized ○ Prove the value. Energy, jobs created, and Medicaid reduction. |

- ID types of data needed. Where to retrieve data from.
- Develop relationships
- How do we id values of energy reduction, school absences, Medicaid reduction, \$to fund weatherization deferral. Come up with a number that represents all housing.
- What kind of data is needed for legislative change?
 - We only allocate 3%
- What are DOE's targets going to be?
- Different agencies to fill gaps between programs.
- Develop ombudsman program to coordinate between all agencies.
- Overarching goal is to get deferral reduction fully funded. There will be significant federal funding related to energy and housing. Need an idea of what is needed and where in order to maximize dollars.
- What sort of data do we currently have?

Category: Affordability, Alignment, & Assistance

- EWR Referrals – Is there a way to build into the system follow up tracking? To see if they actually received services after referral.
- Also part of the strategy with data – energy waste reduction to understand the current situation.
- Because utilities use a lot of 3rd party EWR contractors, it would take a lot of money for tracking and data collection. Would we learn enough from that tracking given the high cost? Could be accomplished through MOU.
- Share intent with customers up front regarding sharing of information, purpose of sharing.

Appendix K – LIEP Summit Workbook Nov. 3, 2022

Policy Pillar 1: Energy Waste Reduction & Weatherization Pillar

| Pillar Purpose and Goal | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|
| <ul style="list-style-type: none"> To guide the process of assessing energy affordability and accessibility holistically, especially through linking energy waste reduction services and energy assistance programs. To reduce the number of households with unsustainable energy burdens. | |
| Problem Statement | |
| Energy waste reduction and weatherization services needed for low-income customers cannot be completed due to a lack of trained workforce and health and safety deferrals. | |
| Point Persons | |
| Brad Banks, Andrew McNeally | |
| Expected Outcomes | |
| Position Michigan to effectively utilize federal funds by removing barriers to providing energy waste reduction and weatherization services and increasing access to low-income households. | |
| Facilitator Name | Email |
| Alex Hoeksema | HoeksemaA1@michigan.gov |
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| Participant Name | Organization |
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| Ben Gulker | BCAEO |
| Kris Schoenow | BCAEO |
| Maddy Kamalay | BCAEO |
| Amy Galpinski | Consumers Energy |
| Avrie Dunsmore | DTE |
| Cory Connelly | EGLE |
| Robert Jackson | EGLE |
| Wende Randall | ENTF |
| Jennifer Soukhome | Holland Board of Public Works |
| Heather Riggle | Indiana Michigan Power |
| Jerin Philip | MDHHS |
| Maddie Wazowicz | Midwest Energy Efficiency Alliance |
| Brad Banks | MPSC |
| Karen Gould | MPSC |
| Melissa Preston | MPSC |
| Mike Byrne | MPSC |

| | |
|-----------------|--------------------------------|
| Nathan Burnand | MPSC |
| Kelly Rose | MSHDA |
| Patrick Leahy | SEMCO |
| Lindsey Vaclav | Society of St. Vincent de Paul |
| Tonya Swenor | Superior Waterhshed |
| Geoff Bierbower | The Salvation Army |
| Bobbi Stratton | TrueNorth Community Services |
| Andrew McNeally | UPPCO |
| Ben Dueweke | Walker-Miller Energy Services |

Quick Wins

Developed Strategies

We recommend... Increasing weatherization funding to be utilized in a sustainable and flexible manner because currently lack of funding and flexibility creates a high rate of deferrals and walk-aways and administrative burden.

Benefits:

- Greater job completion
- Increased housing stability
- Energy bill reduction/decrease energy assistance
- Decreased illness
- Deeper energy efficiency retrofits
- Job creation
- Reduced carbon emissions

We recommend... To act and drive interest to expand and sustain the workforce for workforce and clean energy careers because the current workforce is over capacity and cannot sustain the growth of weatherization and clean energy.

Benefits:

- Ex: Expand K-12 Curriculum
- Small business incubator
- Public outreach/ education
- Incentives current workforce
- More homes will be weatherized and decarbonized
- Economic growth and development
- Increased program uptake coinciding with inclusive WFD practices
- Reduces risk of losing federal funding

We recommend... Expand and codify the definition of Weatherization (EAAC definitions work group) because most entities define Workforce differently.

Benefits:

- Weatherization will become more inclusive
- Eliminates confusion in Weatherization Program

| |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Health/ Safety/ Electrification • Deferral mitigation/ renewable energy • Creates more collaboration |
| <p>We recommend... An appointed person/ office Improved efficiency/ administrative effectiveness of Workforce across all entities because currently the environment is disjointed and siloed.</p> <p>Benefits:</p> <ul style="list-style-type: none"> • Reduces confusion • Allows for pooled efforts • Centralizes results • More holistic services for customers • Continuity of care • Builds trust • Reduces costs/ expansion of services • Climate goals |

| Questions and Comments from Report Out |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Who had weatherization do DNR follow up to determine low usage in households? |
| <ul style="list-style-type: none"> • Customer consent needed |
| Funding |
| <ul style="list-style-type: none"> • LIHEAP percentage to weatherization from current 3% to max 15% • Funding- partner with health care (Medicaid?) • Allocate SLFRF to pair with EWR/ Weatherization to decrease deferrals • Public Act 615- Michigan Energy Assistance Program (MEAP) • Funding factor 91 cents per meter • 50 million limits |
| Outreach |
| <ul style="list-style-type: none"> • Have Governor designate a "Weatherization Czar" or "Home Energy Retrofit Czar" (HER) to oversee and coordinate efforts across government agencies (federal and state) utilizes and NGO's (to break silo's, pool funding, etc.) • Automated closed loop referrals of needed service provision • Barrier/ Solutions- Common programming across utilities • Bill payment assistance agencies- contact info- EVVR/ EE Services • Funding for mall EWR Business |

Policy Pillar 2: Consumer Education & Coordination

| Pillar Purpose and Goal |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> To guide the process of assessing energy affordability and accessibility holistically, especially through linking energy waste reduction services and energy assistance programs. To reduce the number of households with unsustainable energy burdens. |
| Problem Statement |
| <p>The MPSC, utilities and others have created extensive communications plans to inform customers on utility issues, gather customer feedback as well as educate customers on appropriate ways to be involved in the regulatory process. While there are more avenues for customers to seek information than in the past, the complexity of the assistance and EWR/weatherization systems invite broader stakeholder, utility, and State of Michigan coordination for both communicating key information to low-income customers, gaining customer feedback to inform policy development, and engaging customers in meaningful ways.</p> |

| Point Person |
|---------------------|
| Reka Holley-Voelker |

| Expected Outcomes |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Create a coordinated, state-wide strategy to ensure that low-income utility customer voices are heard and centered in our decisions regarding programs and services. |

| Name | Email |
|-----------------------|----------------------------------------------------------------------------|
| Karen King | KingK8@michigan.gov |
| Trinidad Pehlivanoglu | PehlivanogluT@michigan.gov |
| Name | Organization |
| Reka Holley-Voelker | MPSC |
| Amy Rittenhouse | MPSC |
| Andrea Maloy | The Salvation Army |
| Audrey Dean | Consumers Energy |
| Bria Kindred | |
| Dan Dundas | Michigan Electric and Gas Association |
| Denise Diz | DTE |
| Derrell Slaughter | NRDC |
| Douglas Chapel | Consumers Energy |
| Hassan Hammoud | Michigan 211 |
| Jaccie Smith | TrueNorth Community Services |

| | |
|---------------------------------|--------------------------------------|
| Jeffrey Miles | United Way for Southeastern Michigan |
| Jennifer Brooks | MPSC |
| Julie Staveland | EGLE |
| Kasey Grieco | Superior Watershed |
| Monica Martinez | Ruben Strategy Group |
| Nicholas Sakon | MDHHS |
| Nick Dobkowski | ENTF |
| Sergio Reyes | |
| Synia Gant Jordan | |
| Tom Page | RiverStar |
| Tremaine Phillips, Commissioner | MPSC |

Quick Wins

- Dedicated website link on MPSC website for resources
- Petition to allow Google translate button website for MPSC

Brainstormed Topics

What barriers/ challenges do you experience?

- Customer trust
- Trust
- Resources (staffing, time, money)
- Customers seeing utility as a "bad say" - lack of trust
- Customers who don't want assistance for some reason or another
- Validation process customer's trust
- Staff shortages to follow through in a timely manner
- Internal external politics
- Lack of trust/ familiarity our role vs. role of other state departments
- Education/ language barriers
- Restrictive funds
- Non-trusting of assistance programs
- People living in bad quality housing stock often don't own it, so they can't make decisions about things like EWR and fixing problems that increase energy costs
- Lack of interoperability between systems (SER's and MEAP App)
- Capacity (staff)
- Language
- Digital literacy
- No money for care assistance coordinates
- Covid
- Literacy
- Aging population
- Fear
- Lack of trust

- Transportation issue
- Conceptual language
- Unknown resources funding event space childcare
- Finding people in the right context
- Apathy
- Constantly changing information
- Asking people to share feedback in environments not meant for them
- Money
- Systems
- Rural geography
- Weather
- Misinformation
- Negative previous experiences accessing assistance
- Pride
- Crisis-based nature of MEAP program
- Funding caps
- Man-hours
- Prejudice

How can we collaborate to reach customers more effectively?

- Working groups/ listening sessions to share both ideas for collaboration and learned experiences to educate
- Combine: utility resources, utility knowledge, community organization knowledge, community organization trust resources to connect to customers more strongly
- Convene partners (utilities, support, organizations, etc.) regularly to discuss barriers and promote trust and collaboration between organizations
- Share information freely when allowed
- Work towards community goals and objectives
- Share messaging/ efforts/ information (tag team)
- Recognize not one solution fits all, approach from many angles
- Simply process and participate
- Expand ways for customers to provide meaningful feedback and guidance on policies and programs that could benefit them and then publicize how their input influences decisions
- Link on website
- Collaborate on assistance days
- Brochures- sharing word of mouth
- Utilize organization that have customer trust
- Share best practices
- Local presence
- Meet people where they are not where they should be
- Communication
- View each other as allies, resources
- Point people at state/local utilities for advocates to access
- Share funding opportunities
- Go to local events
- Partner with other organizations to offer outreach and education they identify as helpful to their communities

- More community involvement in decision making
- Listen to specific need and find solutions in these issues
- Agency/ utility/ state collaboration
- Understanding rural and urban needs
- Utility companies
- Schools
- Community events
- Michigan voices
- Collectively advocate for increased engagement funding
- Collectively advocate for increased care coordination (long term, proactive engagement)
- Coordinated state-plan with regional distinctions
- Flexible funding with a plan
- Knowing who is missing
- Enhance our lines of communication
- Host meaningful events to connect quarterly
- Centralize information
- share information with organization
- We have the ability to focus very specifically in regard to demographic no low-cost ways to reach customers, but we need messaging to come from trusted sources

What tools do you have to engage/educate customers?

- Several Pages
- Email
- Public events where we are invited to participate
- Email, text, website, social media, in person events
- Lots of data
- Staff (in person, call counters, social media)
- Press Releases
- Media (ads, etc.)
- Attach materials for distribution
- Electronic materials (web, QR codes, social media, etc.)
- Website
- Contact center
- Letters, brochures
- I can help program
- Radio- commercials
- Outbound calls
- Text message
- Gate keeper program
- Websites newsletters, list serves surveys, press releases, FQA's
- Trusted networks to share information and solicit feedback
- Social media
- Website
- Consumer tips
- Issue briefs
- Informational brochures
- Customer assistance team

- New letters
- Legislature
- Events
- Presentations
- Public hearings
- Town halls
- Virtual meetings
- Social Media Posts
- Online Portal for Customers
- Networks
- Lived experience
- Data
- Local/ City Plans
- Policies and Processes
- People
- Compassion/ empathy
- Websites
- Other agencies
- Energy efficiency kits
- Fairs
- Webinars
- Collateral
- 211
- Newsletters
- Budget Tools
- Food Pantry/ Other assistances
- Care center
- Outreach team/ communications team
- Self-sufficiency interaction
- Surveys
- Physical location
- Vendor with consumers energy
- One to one and broadcast to many customers using email and text to promote awareness of assistance programs and meet customer needs more quickly and effectively with the goal of building trust and improving customer satisfaction
- Survey monkey application- web based application tool
- Our website
- 211 call line
- Care coordinates/ job security
- Digital print and collateral
- Web analytics
- Customer analytics

What sort of costumer engagement is currently being done?

- Escalating customer concerns from customer service channels
- Call centers
- Social media

| |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Every contact is an engagement town hall meeting • Customer outreach days • Customer focus groups • Quarterly meetings with community leaders and biannual workshops • Salon conversations parking lot paretic's • Black Voices at the river • Phone based • Web based • Place based events • Surveys (All the time) and workgroups (sort of) • 3rd Party evaluations • Energy assistance • Phone conversations • Home energy audits • Weatherization • Surveys • Presence in communities • Local workshops • Outreach phone calls • One to one assistance services • Goal setting with households • Connect with community resources with follow up • Going over budgets- household income • Discussing ways to reduce energy usages |
| What customer outreach/education is being done currently? <ul style="list-style-type: none"> • Annual brochure • Contact center- inform help- specialist • Outbound calls, letters, text • Customer outreach days • Faith bases collaborate • Information on website • Direct emails to customers • Direct mail to customers • Facebook posts • Staffing tables at community outreach events • Social media • Billing inserts • Text messaging/ email • Email, text, postcards (direct to customer) • In person presence at community events • Working to distribute knowledge/ information through community organizations • Grants to communities and non-profits who work with their residents/ members on energy efficiency, renewable energy, and electric vehicle charging • Use of department • Website • Minimal social medial postings |

| |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Community events with utilities • Outreaches done by customer concerns for food pantry or other programs • Flyers are given out • Social media, texting, 211 triages (utility) SDOH screen four utilities • Eligibility matching outbound calls • Social medial outreach • In person community outreach (in local churches, libraries, etc.) • Brochures both virtual and in person • Energy efficiency work in homes • Press releases • Email blasts • Word of mouth • Utility partnerships • 5k mini grants • Info sessions • Listening • Monthly/ weekly meetings • Ambassadors on the ground • Earned media • Websites • Mailings • collaboration with other organizations • Education during contact their originates for a different reason |
| Strategies |
| Building Trust |
| <ul style="list-style-type: none"> • Make efforts to ensure agency follow up and follow through. • Change the way information is distributed. <ul style="list-style-type: none"> • Locally, frequently visited, and trusted businesses. • Associations. • Schools • Show kindness, compassion, and respect. <ul style="list-style-type: none"> • Customer service • Training • Nonjudgment of customers (believe them) • Make information available in a variety of languages; ask trusted organizations to distribute. • Include community members in ongoing strategic planning. • Continued follow up <ul style="list-style-type: none"> • Conduct study on messaging • What is working, what is not working? |
| Increased information sharing among partners and strategic funding |
| <ul style="list-style-type: none"> • Funding for ongoing collaboration <ul style="list-style-type: none"> • Hold ongoing meetings to build from this conversation • Information sharing • Regional collaboration; Townhall style, informal collaboration with MPSC |

Policy Pillar 3: Affordability & Customer Protection

| Pillar Purpose and Goal |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> To guide the process of assessing energy affordability and accessibility holistically, especially through linking energy waste reduction services and energy assistance programs. To reduce the number of households with unsustainable energy burdens. |
| Problem Statement |
| Customers in need don't always know assistance services are available or are ashamed to apply. Those customers who do apply do not always receive the supports they need because systems for customer support are complex and not necessarily targeted to their specific needs. |
| Point Persons |
| Anne Armstrong, Mary Wilkins |
| Expected Outcomes |
| Support Michigan's low-income customers with energy affordability programs and services tailored to promote energy security, energy equity, and energy self-sufficiency. |

| Name | Email |
|---------------------|------------------------------------------------------------------|
| Jackie Badder | BadderJ@michigan.gov |
| Andrew Halfman | HalfmanA@michigan.gov |
| Name | Organization |
| Alexis Blizman | Ecology Center |
| Amy Bandyk | Citizens Utility Board |
| Angela Sterner | The Salvation Army |
| Anne Armstrong | MPSC |
| Bethany Stutzman | United Way South Central Michigan |
| Julie Cassidy | MLPP |
| Cherrie Benchley | Roscommon United Way |
| Chris Forist | MPSC |
| Elaina Braunschweig | MPSC |
| Jacklyn Hulst | |
| Jake Thelen | MPSC |
| Jamie Curtis | MPSC |
| Jeffrey Guifoyle | Treasury |
| Jodi Formolo | UPPCO |
| Kathy Schafer | CR News/CR Marketing |
| Kristin Bolds | Society of St. Vincent de Paul |

| | |
|----------------|--------------------------------------|
| Laurie Owens | SEMCO |
| Mary Wilkins | MPSC |
| Niki Fanjoy | TrueNorth Community Services |
| Rick Bunch | 5 Lakes Energy, MI-MAUI |
| Sakinah Howard | DTE |
| Sarah Mulkoff | MPSC |
| Sean Scane | United Way for Southeastern Michigan |
| Tammy Bair | MDHHS |
| Wanda Jones | MPSC |
| Zoe Ahlstrom | Consumers Energy |

Eligibility

- Customers self-attesting to RIA should receive an EWR referral (reserve outreach)
- Accessibility to energy assistance and weatherization
- Easier access to apply and qualify. Streamline eligibility for both
- Aligning eligibility more closely so connections between programs can be made easier
- Expand eligibility
- Higher income limit
- DHHS provide a list of people denied SER for non-income reasons to utilities to enroll customers in utility assistance
- High energy users better focus on EWR referral and actions to educate or fix the root cause
- Allow those approved for HHC to qualify for MEAP

Applications

- Provide a greater heating benefit to avoid/ prevent crisis
- Allow improvement for households prior to crisis. MDHHS to verify income. MEAP for enrollment
- MEAP one time assist us in application enrollment
- More stress should be made on the application to avoid a customer not getting assistance when funds dry up
- Allow an app "third year" that gradually increases customer payment to full amount. Offer "third year" as an incentive for continuous self-sufficient engagement

Equity – Include Across All Issues

- Equity Issue: high consumption due to housing stock/ copayments/ medical equipment
- Additional flexibility in MEAP caps
- Streamlined and assessable to weatherization
- Local is cheaper- allow residents to change providers
- Land geography
- Energy from local sources- landfills, water, farms

| |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Critical Care |
| <ul style="list-style-type: none"> • Critical care protections should require SER application and a payment plan. Some accounts carry balances greater than \$10K (when protection no longer is available, household is at risk- the balance is too high for SER) • Certification for critical care/ medical shut-off protection- make renewal easier (longer certification period, easier signature process, etc.) |
| Funding |
| <ul style="list-style-type: none"> • Expand RIA/LIA to TANF + SSI recipients • More money- flexible funding |
| Home Heating Credit Reform |
| <ul style="list-style-type: none"> • Review whether tax credit is the best way to distribute LIHEAP • Have heating assistance available at the beginning of the heating season • Home heading credit application in MI bridges |
| Customer Experience |
| <ul style="list-style-type: none"> • Leading with empathy- greater training and deeper understanding of matching programs to services • More doorways than DHHS to access services • Leadership and coordination across state government (MPSC + Treasury + MDHHS +EGLE (and others?)) |
| Crisis Prevention |
| <ul style="list-style-type: none"> • Prevent crisis • Address social determinants of health in trying to address ability crisis. Utility bill is what brings them to needing help, but may not be the underlying issue causing the crisis • Focus on shifting to working with households prior to crisis • Don't wait for crisis/ offer programs before problems • SER eligibility requires the customer to go into crisis • Creates instability in the households • Eliminates elderly from being eligibly since they stive to not go into arrears while being income eligible for help • Redefine crisis to include critical care and medical hold customers with accruing arrears |
| Building Owner Program |
| <ul style="list-style-type: none"> • Incentives for landlords to weather low-income homes • Section 8 requirement (maybe for another group) • Government/ lender interventions to prevent owner/ occupant changes when bldg./ equipment is sub standard |

| Developed Strategies |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Broad Goal: Support Michigan's low-income customers with energy affordability programs and services tailored to promote energy security, energy equity, and energy self-sufficiency. |
| Eligibility Strategy |
| <ul style="list-style-type: none"> Identify opportunities for automatic enrollment in energy assistance for eligible customers. (HHC/MEAP; SER/utilities; RIA/EWR) Review program eligibility requirements for alignment and expansion. |
| Communication Strategy |
| <ul style="list-style-type: none"> Design intelligent systems to provide relevant education when needed in accessible format. |
| Application Strategy |
| <ul style="list-style-type: none"> Utilize MI Bridges to access all energy assistance including HHC. Identify ways to refer and serve income eligible customers who may not be approved for SER/HHC. Include MEAP community agencies and DHHS. |
| Funding Strategy |
| <ul style="list-style-type: none"> Increase funding for programs that support energy assistance. <ul style="list-style-type: none"> Flexible funding source <ul style="list-style-type: none"> In how it is structured/used Eligibility General fund dollars allocated MEAP Sunset 2023 ("We ride at sunset!") <ul style="list-style-type: none"> Increase funding factor Remove cap of \$50 million Include additional contributing vendors, i.e., natural gas and propane Review rate allocations Expand RIA/LIA credits to TANF and SSI Expand PIPP programs out of pilot phase |
| Crisis Prevention Strategy |
| <ul style="list-style-type: none"> Strengthen the crisis prevention system by: <ul style="list-style-type: none"> Reviewing whether tax credits are the best way to distribute LIHEAP "home energy assistance (heating and cooling)" Allow customer who qualify for LIHEAP "home energy assistance" to receive MEAP including APPs <p>Utilize LIHEAP A16 through MEAP to address SDoH needs</p> |

| Questions and Comments from Report Out |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Application |
| <ul style="list-style-type: none"> Utilize MI Bridges to access all energy assistance, including HHC Identify ways to refer and serve income eligible customers who may not be approved for SER/HHC Includes MEAP Community agencies and DHHS |
| Strengthen the crisis prevention system by: |
| <ul style="list-style-type: none"> Reviewing whether tax credits (HHC) are the best way to distribute LIHEAP home energy assistance |

| |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Allow customers who qualify for LIHEAP home energy assistance to receive MEAP, including APP's • Utilize A16 through MEAP to address SDOH needs |
| Increase funding for programs that support energy assistance |
| <ul style="list-style-type: none"> • Flexible funding source- in how it is structured/ used, eligibility, general fund dollars allocated • MEAP sunset 2023- increase funding factor, remove cap at 50 million, include additional vendors (natural gas, propane) • Review Rate allocations • Expand RIA/LIA credits to TANF and SSI • Expand PIPP Programs out of pilot phase (percentage of income pilot program) |

Appendix L – Energy Affordability Defined – Companion Document

A collaborative process to arrive at a definition

Abstract

This report presents the definition of “energy affordability”, including detailed language to clarify terms embedded in the definition, and describes the process taken to arrive at the definition. This work is the result of a charge by the Michigan Public Service Commission in its Coronavirus Response Order (Case U-20757) and constitutes recommendation for adoption as completion of the first phase of the charge to the Definitions Ad-Hoc Subcommittee.

Definitions Subcommittee of Michigan’s Energy Affordability and Accessibility Collaborative
Co-chaired by: Mary Wilkins and Wende Randall
August 2022

Executive Summary

As part of the Energy Affordability and Accessibility Collaborative (EAAC)³²ⁱ sponsored by the Michigan Public Service Commission (MPSC)³³ⁱ, the Definitions Ad-Hoc Subcommittee (Subcommittee) was charged with establishing a common definition of energy security/self-sufficiency, beginning with the proposed definition by the Michigan Energy Assistance Program (MEAP)ⁱⁱⁱ Workgroup Subcommittee Two, “A household's basic needs for home energy are being met while minimizing reliance on public assistance.” The Subcommittee was also tasked with developing a proposal for an energy affordability standard and how that standard can be integrated into the regulatory environment, along with suggesting requirements for consistent energy affordability-related information for utilities to submit to the appropriate dockets: rate cases, integrated resource plan (IRP)^{iv}, and energy waste reduction (EWR)^v cases.

The Subcommittee first undertook the task of defining energy security/self-sufficiency. As directed by the Commission in the February 10, 2021 order in Case No. U-20757³⁴, the Subcommittee utilized the definition of self-sufficiency provided by the MEAP Workgroup Subcommittee as a starting point and ultimately determined that it was a definition of energy affordability toward which the Subcommittee was working. In the spirit of the Commission’s U-20757 order, aspects found in various definitions of energy security were considered for inclusion in the definition of energy affordability. This document will serve as a reference tool to further appreciate and illuminate the applicability of this definition.

³² [Energy Affordability and Accessibility Collaborative \(michigan.gov\)](https://www.michigan.gov/energy-affordability-and-accessibility-collaborative)

³³ [Michigan Public Service Commission](https://www.michigan.gov/public-service-commission)

³⁴ [Case: U-20757 \(force.com\)](https://www.force.com/cases/u-20757)

At the end of a ten-month process, the Subcommittee arrived at a definition of energy affordability in April 2022. The Subcommittee defined energy affordability as follows:

A household has the resources to meet their home energy needs for heating, cooling and other uses in a healthy, sustainable and energy efficient manner without compromising a household's ability to meet other basic needs.

It is important to note that for the purposes of this definition, energy is considered affordable with or without assistance, i.e., a cost subsidy. In defining energy affordability, Subcommittee members were cognizant that the ability to afford energy is due in part to larger economic factors outside the control of energy regulators, customers, utilities, or other energy stakeholders, therefore there will always be people who need assistance paying their energy bills. There is also an awareness that the current need for assistance surpasses available funds.

Within this definition there are three terms with meanings that are complex or open to interpretation. It is worthwhile to elucidate those terms here. Those terms are “healthy,” “sustainable,” and “energy efficient.” Each of these three components identify factors that are foundational to policies and programs that advance energy affordability and should be considered from a practical standpoint in any comprehensive effort to improve energy affordability. The members of the Subcommittee look forward to assisting in next steps to develop such policies and programs.

The Meaning of Healthy

Three distinct aspects of health may be impacted by energy affordability. Two of these aspects, physical and mental health, may have chronic or pervasive elements, and the third aspect, safety, may have acute or urgent considerations and consequences.

The affordability of energy can impact the physical health of household members in a myriad of ways. The energy used for home medical equipment such as nebulizers, breathing machines, home dialysis machines, and the like, often help residents avoid the hospital or other higher-cost health care settings. Physical health may also be impacted by an inability to prepare food or engage in adequate personal hygiene due to unaffordable utilities, i.e., the inability to heat or store food at safe temperatures, a lack of hot water for bathing, lack of electricity for laundering clothes, etc.

Physical health conditions can be directly enhanced with improvements in the energy efficiency of the home. Indoor air temperatures ideally managed between 10-24 degrees Celsius or 64-75 degrees Fahrenheit,³⁵ warmer and drier air, and relative humidity have been shown to reduce heat and cold related deaths,

³⁵ [WHO Housing and health guidelines](#)

hypertension, and heart disease. Respiratory risks, asthma, and chronic obstructive pulmonary disease (COPD)^{vi} are also reduced by warmer, drier air, as well as by reductions in mold, particulates, pollutants, allergens, and by-products of combustion. Moisture and air pollutants can also impact heart disease risks and some cancers.³⁶

Mental health impacts of energy can be seen in the stress, anxiety, and other factors associated with affordability. Unaffordable bills or unexpected energy expenses resulting from extreme weather and other factors require difficult prioritization of basic needs and this crisis creates worry, anxiety, and/or depression. Chronic stress resulting from economic insecurity and the inability to afford basic needs can become toxic.

Toxic stress is frequent, chronic stress in the absence of adequate support, and has harmful and potentially lasting effects on a person's physical and mental health. These impacts may be expressed in a person's physical, mental, and behavioral health and may have long-lasting consequences for immune functioning, as well as cognitive functioning.³⁷

The stigma of utilizing public assistance may create or heighten the impacts on mental health. Societal pressures of individualization and achievement are contributing factors to the relatively low percentage of households utilizing benefits among those that are eligible. Generally, thirty to sixty percent of households do not apply for the assistance for which they are eligible based on income and other factors. Stigma leads to increased worry (stress), which may lead to functioning disparities.³⁸

Safety considerations in energy affordability may also center around housing quality. Safety issues may include things such as carbon monoxide detection and remediation, fire and electrocution risks due to faulty wiring, and other fire hazards due to creosote buildup and combustion appliances.³⁹ Whether a customer owns their home or is a tenant, the opportunity to affordably address safety concerns is paramount.

The Meaning of Sustainable

For the purposes of this definition, sustainable refers to financially sustainable, meaning that a customer is able to make enough of a payment every month to avoid an interruption in service. Sustainability is also a concept included in the energy efficiency portion of this definition and encompasses environmental sustainability.

³⁶ [Code Enforcement Work Group \(aceee.org\)](https://www.aceee.org/),
[Health Impacts of Healthy Housing Interventions Research Projects | NCHH](https://www.nchh.org/health-impacts-of-healthy-housing-interventions-research-projects/)

³⁷ [Toxic Stress | The Administration for Children and Families \(hhs.gov\)](https://www.hhs.gov/toxic-stress/)

³⁸ [Stigma and Other Determinants of Participation in TANF and Medicaid on JSTOR](https://www.jstor.org/stable/2086888)

³⁹ [Weatherization Health & Safety | Department of Energy](https://www.energy.gov/weatherization-health-safety)

In response to a survey on energy affordability, low-income customers and assistance workers, (62%) and members of advocacy organizations (63%) felt strongly that using energy in a sustainable manner means doing so in a way that individuals will continue to be able to afford their energy bills. Low-income customers have indicated in listening sessions conducted by the MPSC in the Spring of 2022 that consistency in billing amounts and knowing what to expect in their energy bills contributes to their ability to plan for and pay their bills month after month.

The Meaning of Energy Efficient

In the context of this definition, the phrase energy efficient refers to the use of less energy to complete the same task and to reducing use when energy may not be needed. As referenced in the sustainability section, when considering what it means to use energy in a sustainable manner, low-income customers and the assistance workers who serve them, utility company staff, and members of advocacy organizations agree on the importance of taking care to avoid wasting energy, to be energy efficient. Low-income customers, assistance workers, and members of advocacy organizations also felt strongly that using energy sustainably means doing so in a way that is safe for the environment, including impacts on the physical environment and home environment from energy generation and usage.

Tactics to establish greater energy efficiency in a home may include behavioral changes, changes to the physical space, or use of appliances/products that reduce or eliminate energy waste and lower cost and environmental impact.

Examples of behavioral tactics to reduce energy use may include turning off lighting and appliances when not needed, while changes to the physical space may include installing new insulation or repairing leaks and cracks in roofs and windows. Appliances and other products that reduce or eliminate energy waste and lower cost and environmental impact may include newer washers, dryers, furnaces, air conditioning units, stoves, refrigerators, and the like.⁴⁰

METHODOLOGY

Subcommittee Participation

Twenty-one individuals expressed interest in participating in the Definitions Ad-Hoc Subcommittee of the Energy Affordability and Accessibility Collaborative (EAAC)ⁱ via a participation survey. Twelve to fifteen of those individuals were in attendance at any given meeting. A third of participants represented investor-owned utilities. A quarter of participants represented various advocacy organizations and another quarter were State of Michigan employees. The balance of the Subcommittee was comprised of representatives from organizations serving low-income energy customers.

⁴⁰ <https://www.energy.gov/eere/energy-efficiency>;
https://www.energystar.gov/about/about_energy_efficiency

Approach to the Task

The Michigan Public Service Commission in Case No. U-20757 directed the establishment of a common definition of energy security/self-sufficiency beginning with the proposed definition by Michigan Energy Assistance Program (MEAP) ⁱⁱⁱ Workgroup Subcommittee Two. Co-chairs of the Definitions Ad-Hoc Subcommittee followed that directive and utilized the definition of self-sufficiency determined by this subcommittee of the MEAP Workgroup as the foundation for the definition the committee was directed to establish. On June 14, 2021, the EAAC hosted a presentation by subcommittee leader, Kristin Bolds entitled “Getting to a Definition of Self-Sufficiency.” This presentation explained how the workgroup arrived at their definition of self-sufficiency, which is as follows: “A household’s basic needs are being met while minimizing reliance on public assistance.”

Co-chairs of the Definitions Ad-Hoc Subcommittee then researched definitions of energy security and found that from this random sampling of energy security definitions, there were opportunities to modify the workgroup’s definition of energy security/self-sufficiency by choosing to incorporate or leave out any of the following dimensions or concepts inherent in the energy security definitions.

As with the Low-Income Home Energy Assistance Program (LIHEAP), the use of “home” as a modifier to energy could be considered to distinguish the concept from municipal, or national energy security. As seen in some of the sampling of definitions, “basic needs” could be further defined to include types of fuel.

Uses of energy could be specified to include cooking heating, lighting, communications, and other productive uses. Cooling and the concept of reasonable temperature could be considered. Additionally, a question was broached as to whether non-energy utilities such as internet or water/sewer should be included for use in this collaborative process.

Consistency or lack of energy interruption was also a concept considered, as was the concept of sufficient quantities of energy. For example, should the definition be narrowed to include only the time of need or be defined to address continuous service without interruption?

When it came to affordability, although most organizations defer to the concept of energy burden rather than providing a definition of energy affordability, there were a number of concepts available for consideration. Those concepts included elements such as consent or agreement to price or cost, “reasonable” pricing, and payment predictability. The ability to manage or support bill payment was considered, including having the resources to consistently pay bills today or over time, month after month; the ability to pay bills without use of savings or credit; and the ability to pay on time.

Subcommittee Process

A road map for vetting these concepts was laid out at the first meeting on August 26, 2021 and was modified as needed in later meetings. Each slide deck began with a review of the Subcommittee’s charge from the Commission and noted that the

goal was “To discuss, hear each other, and work toward consensus.” At the end of each of the Fall 2021 meetings, participants were asked “Will this definition, as refined, help us to develop an energy affordability standard and measure success?” and “Does this definition point us to data that will be useful to consistently collect in rate cases?”

At key decision points in the Subcommittee’s discussion, polls were utilized to determine consensus or lack thereof. Finally, a survey was utilized to test the Subcommittee input against a larger and broader group of stakeholders. The decision-making process whereby the Subcommittee would evaluate and decide which concepts to include or exclude from the definition was shared in the first meeting. As the Subcommittee progressed through consideration of specific terms to be included in the definition, the road map and timeline were updated and shared with the Subcommittee to ensure clear expectations.

All meetings incorporated presentation, discussion, clarification, and affirmation of pending items in need of resolution. Though the intent was to reach consensus on specific points through the course of each meeting’s discussion, the range of perspectives and desire for additional research or consideration frequently led to the need for follow-up. Both polls and surveys were utilized, either during or following meetings, to allow each participating Subcommittee member to express their recommendation for the language being adopted and the next step of the work. Each subsequent meeting included the results of the previous poll, presentation of how the results were incorporated into the draft definition, and the next word or issue to be decided upon. Meetings followed this pattern from September through November 2021.

To set the stage for the first meeting, participants were invited to a Microsoft Teams meeting via email sent August 12 and were asked to review the article “The Meaning of Energy Security Depends on Who You Are.”⁴¹ At the convening meeting on August 21, 2021 the path that would be taken to arrive at a definition was laid out, and the first two decisions were made via poll. The poll was administered utilizing research.net software and links to it were placed both in the Teams meeting chat and sent to committee members via email toward the end of the meeting time. The poll questions included, “To what definition are we trying to arrive: self-sufficiency, energy security or energy affordability?” and “Should we refine it as home energy security or affordability (as opposed to municipal, national, etc.)?”

There were fifteen respondents to the poll, and to the first question, three quarters (11) of those respondents weighed in that energy affordability was the object of our work together, while three chose energy security, and one chose self-sufficiency. Subcommittee members voted to clarify the definition and refine it using “home” as a modifier by a margin of fourteen to one. The concept of home was later replaced with the use of the term “household.”

⁴¹ <https://www.brookings.edu/opinions/the-meaning-of-energy-security-depends-on-who-you-are/>

At the September 9, 2021 meeting the Subcommittee discussed and then was polled regarding the following three questions:

1. Should we or should we not include any or all the following uses of energy in a definition? If yes, which ones: cooking, heating, lighting, communications, cooling, other productive uses, or none of the above?
2. Should we define types of fuel as they relate to an energy affordability standard? For example, “the adequate supply of energy across the electricity, gas, and liquid fuel sectors.”⁴² If yes, what fuel types would be incorporated?
3. Should non-energy utilities such as internet or water/sewer be included for use in this collaborative?

With one of eleven respondents abstaining from the question, the poll for the first question was evenly split between ten respondents, with five voting to include cooking, heating, lighting, and cooling, and two of these five additionally supporting the inclusion of communications and other productive uses. The remaining five chose none of the above. As to the second question, the Subcommittee voted at a ratio of nine to two not to define fuel types. The third question elicited a response of none of the above from seven respondents, while four voted to include water.

At the meeting of September 23, 2021, committee members revisited the concept of basic needs and debated the pros and cons of including these concepts. In a poll following the meeting, seven of eleven members supported the inclusion of heating, cooling, and lighting, while the remaining options garnered less than fifty percent support.

In the same poll, members were asked the following: “Which language choice would you include in our definition? Select all that you would agree with to complete this sentence: ‘Energy Affordability means A household’s basic needs for home energy (for cooking, heating, cooling, and lighting) are being met...’” The phrase “while promoting energy efficiency” was supported by nine of twelve respondents and the phrase “to promote health and well-being” was supported by eight of twelve. The committee was then asked, “Which language choice would you NOT include in our definition? Select all that you would disagree with to complete this sentence: ‘Energy Affordability means a household’s basic needs for home energy (for cooking, heating, cooling, and lighting) are being met...’” This survey further vetted the concepts of basic needs, energy supply, including energy efficiency, reasonable temperature, consistency or lack of interruption, and sufficient quantities of energy (enough, adequate, plenty).

The poll results were discussed at the October 7, 2021 meeting and were reported as follows:

- Energy efficiency: Majority (73%) support for inclusion
- Promote health and well-being: Majority (64%) support for inclusion
- Basic needs: Majority (60%) support for including heating, cooling, and lighting

⁴² <https://www.energy.gov.au/government-priorities/energy-security>

- Sufficient quantities (91% opposed) /adequate supply (82% opposed): Lack of substantial support for inclusion
- Consistency (10% support) / lack of interruption (64% opposed): Lack of substantial support for inclusion
- Reasonable Temperature: Lack of support (0%) for inclusion

Also presented during the October 7, 2021 meeting were concepts related to affordability, and committee members were asked to consider whether and how to include consent or agreement to price or cost, reasonable pricing, payment predictability, ability to pay bills today or over time, i.e., month after month, ability to pay bills without use of savings or credit, and the ability to pay on time. A poll regarding these concepts was circulated following the meeting.

The poll was closed on October 15, 2021 after receiving eleven responses. There was unanimous agreement that energy affordability means the ability to pay bills over time, month after month. There was majority agreement (64%) that "affordable" does not mean consenting or agreeing to the cost of energy. Due to a lack of consensus regarding the remaining questions and concepts (reasonable pricing, payment predictability, ability to pay bills without use of savings or credit, and the ability to pay on time), a degree of ambivalence was inferred, and these concepts were set aside.

At the October 21, 2021 meeting, due to a lack of consensus around concepts related to affordability, the committee reviewed a number of resources and entertained several discussion questions. Committee members were introduced to a 2020 article by Marilyn A Brown, *et al*, titled "High energy burden and low-income energy affordability: conclusions from a literature review"⁴³ and reviewed the various dimensions included in the energy metrics of energy burden, energy insecurity, energy poverty, and energy access. This resource information provided a backdrop for the committee to reflect and discuss the household relationship to energy affordability.

Additional resource information, including the Merriam Webster definition⁴⁴ of affordability, was reviewed. Additionally, three perspectives on defining energy affordability by industry experts were shared. Experts included Timothy Alan Simon, Esq., Counsel and Consultant, TAS Strategies (former commissioner, California PUC^{vii}); David Conn, Energy Assistance Program Manager, Baltimore Gas and Electric Company (BGE^{viii}); and Chad Quinn, Chief Executive Officer, Dollar Energy Fund, Pittsburgh.⁴⁵ The concept of energy burden was then introduced,⁴⁶ as well as an

⁴³ <https://iopscience.iop.org/article/10.1088/2516-1083/abb954>

⁴⁴ <https://www.merriam-webster.com/dictionary/affordability>

⁴⁵ <http://defqllc.com/publication/energy-affordability-and-energy-service-choices-three-perspectives/>

⁴⁶ <https://www.aceee.org/sites/default/files/energy-affordability.pdf>

alternate calculation of affordability as seen in Integrated Resource Planning Access.⁴⁷

The committee considered the drivers of high energy costs⁴⁸ and then debated what costs are being considered in energy affordability. Costs presented for consideration included financial costs: household living expenses, costs to produce and distribute energy safely and reliably, a reasonable profit incentive for investors to maintain/improve systems, technology/innovation costs; human costs: health, justice, well-being; and environmental costs: what role “clean energy” plays in energy affordability. Finally, the committee considered the affordability of the utility grid of the future.⁴⁹

Following the October 21, 2021 meeting, another survey was sent to committee members asking what costs should be considered when defining energy affordability and what costs should not be considered. Respondents were asked what approaches should be included in affordability strategies and the inverse, if any of the approaches should not be included in the affordability strategies, please identify them.

The number of responses to each of these questions ranged from six to eleven responses. There were nine responses to the first question and seven of nine committee members thought costs to produce and distribute energy safely and reliably should be considered when defining energy affordability. Six of nine felt environmental costs should be included. Five of nine supported the costs to human health and human well-being when defining energy affordability. Receiving lesser support (four of nine) were household living expenses, reasonable profit incentives for investors to maintain/improve systems, and technology and innovation costs. Finally, three of nine respondents supported considering the cost of justice in defining energy affordability.

When asked what costs should not be considered, seven of ten responses indicated that reasonable profit incentives for investors to maintain/improve systems should not be considered. Each of the remaining answer possibilities received three or four votes, meaning 30-40% of respondents felt they should not be considered.

When asked what approaches should be included in affordability strategies, of the 11 survey respondents, the majority agreed that all four answers presented should be included. Nine of eleven supported approaches that keep costs low for all energy customers and approaches that keep costs low for all consumers of energy, whether behind the meter or distributed energy resources. Eight of eleven supported shifting costs to taxpayers to ensure affordability for low-income customers or those with higher energy burdens, and seven of eleven supported shifting costs to rate

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https://www.researchgate.net/publication/319205622_Integrated_Resources_Planning_for_Energy_Access

⁴⁸ <https://www.aceee.org/sites/default/files/energy-affordability.pdf>

⁴⁹ <https://www.voiceofsandiego.org/wp-content/uploads/2021/02/Feb-2021-Utility-Costs-and-Affordability-of-the-Grid-of-the-Future.pdf>

payers to ensure affordability for low-income customers or those with higher energy burdens. When asked the inverse question, four of six opposed shifting costs to taxpayers to ensure affordability for low-income customers or those with higher energy burdens, and four opposed shifting costs to rate payers to ensure affordability for these same customers. Three of six opposed approaches that keep costs low for all energy customers, while three opposed approaches that keep costs low for all consumers of energy whether behind the meter or distributed energy resources.

At the November 4, 2021 meeting, the committee reviewed the decision-making process they had engaged in over the previous five meetings and debated language to include in the definition. The committee also identified the need for broad stakeholder input into the meaning of concepts included in the draft definition.

Following the meeting, a survey was sent to committee members listing various proposed definitions. The responses to this survey were inconclusive. Co-chairs of the Subcommittee then reframed the survey by asking five questions on specific phrasing choices of the definition rather than a proposed definition as a whole.

The first question was as follows: “How would you qualify energy as ‘able to be afforded?’” That question received seven replies from eight survey respondents, with four choosing the response, “A household has the resources to meet their home energy needs,” and three preferring “A household’s home energy needs are being met.” The second question was as follows: “In defining energy affordability, would you qualify home energy uses as ‘for heating, cooling, and other uses?’” This question confirmed Subcommittee consensus, with seven of eight affirming with a “yes” answer and one opposed with a “no” answer.

To account for the variety of opinions in the small yet diverse Subcommittee, questions three through five provided an option to leave phrasing on that question topic out of the definition altogether. The third question was as follows: “In addressing the manner in which energy is used, which phrasing do you prefer?” The responses revealed that five preferred “in an energy efficient manner,” two preferred “while promoting energy efficiency,” and one selected “None of the above; I would leave this concept out of the definition.”

In response to the fourth question, “In defining energy affordability, how would you qualify ‘having a cost that is not too high?’” one chose the response “with cost efficient energy pricing,” three chose “without compromising the household’s ability to meet other basic needs,” and half of the Subcommittee preferred, “Neither of these phrases; I would leave this concept out of the definition.”

The November 18, 2021 meeting was cancelled due to lack of participation, and work was suspended while MPSC Staff submitted a December status report on the work of the EAAC to the Commission.

The Subcommittee reconvened on January 6, 2022 and reviewed the latest survey results, while also discussing how to proceed with broadening input into the definition beyond the small Subcommittee regarding the meaning of included

concepts. These included concepts were having a cost that is not too high, able to be afforded, home energy efficiency, health and wellness, and sustainability.

Following suggestions from committee members, co-chairs drafted a survey. The draft was shared with the Subcommittee for review on January 20, 2022, and responses, along with suggestions regarding distribution of the survey, were requested by January 25, 2022. Co-chairs incorporated those suggestions for changes and adjusted language for clarity of understanding.

The Subcommittee met again on February 16, 2022, at which time an updated version of the stakeholder survey was presented with language revised for more clear understanding and the format reviewed for ease of completion. A Google document was shared with the Subcommittee to obtain contact information and further inform the stakeholder list. It was also determined that the same survey would be broadly distributed, utilizing three distinct survey links through research.net software and sent to three separate stakeholder groups. These stakeholder groups included energy assistance organizations for sharing with direct service staff and those receiving assistance, utilities, and advocacy organizations for distribution among their membership. Between February 25 and March 1, 2022, the survey links were distributed to 15 human service organizations, nine utility contacts (including utility associations), and 25 advocacy organizations, requesting that the survey be shared among their constituents with a closing date of March 14, 2022.

On March 16, 2022, committee members met for initial review of survey responses. There were a small number of responses after the meeting slide deck was completed; finalized survey results will be reported here. From the three stakeholder groups, there were 317 responses to the human service organization link, 16 responses to the utility provider link, and 33 responses to the advocacy organization link, for a total of 366 responses. Of respondents to the human service organization link, 38% (121) reported that they heard about the survey when “applying for assistance with my energy bill.” Another 44% (139) work for an organization that provides energy assistance, and 17% (53) reported being a member of a group or coalition that was asked to participate in this survey. The remaining <2% (4), reported working for a utility provider. Of utility providers, half (8) reported being from a municipal utility and the other half (8) from a shareholder owned utility. Of advocacy organizations, 97% (31) reported being a member of a group or coalition that was asked to participate in this survey and 3% (1) reported hearing about it while applying for assistance with their energy bill.

In comparison to the March 16, 2022 meeting which reviewed survey results, during the April 20, 2022 meeting, the Subcommittee determined how to apply the survey results to the definition of energy affordability. While results were reviewed by stakeholder type, the way the results were incorporated into the draft definition considered the overall responses to each question. Each question informed a portion of the definition itself or this companion document.

The first survey question read as follows: “In thinking about how much energy costs, what is the best way to describe ‘having a cost that is not too high?’ Choose the

option you like best.” The responses to this question indicated a clear consensus of 58% affirming use of the following language: “Energy is affordable when paying my bill doesn’t impact my ability to meet other basic needs.” In addition to the clear agreement on this specific phrase, it is notable that no other response options received preference greater than 12% by any stakeholder group.

The second survey question asked for a “Yes/No/Unsure” response to the following question: “Would you agree that having a home that is energy efficient can help with energy affordability?” Across all stakeholder categories, respondents agreed with this statement 94-100%. This result led to the inclusion of the phrase “in an energy efficient manner” in the definition.

Question three asked stakeholders to rank tactics for making energy bills more affordable by asking the following: “Which of the following things do you think helps with making utility bills more affordable for households? Please rank them with #1 having the greatest impact.” It is important to note that the responses to this question are a means of further understanding what is meant by “energy efficiency.” Spanning the list of options, no single action received a clear indication of having the greatest impact. Due to the wide range of perceptions of what leads to making utility bills affordable for households, it was determined that the concept of energy efficiency would be appropriate for further description in this companion document.

The fourth survey question asked the following: “Do you think that a discussion of energy affordability should include health and wellness?” To this question, there were divergent responses between categories of stakeholders. An overwhelming 80% of total responses across stakeholders affirmed that health and wellness should be included as a factor of energy affordability. Notably, 43% of utility provider respondents wanted to include health and wellness.

In the fifth question, stakeholders were asked, “Which of the following energy uses are important to make affordable? Choose all that apply.” Here, responses help shed light on which energy uses are important to customers. All uses listed were chosen by more than 50% of Agency and Advocacy groups as being important. The following three uses received 76-84% agreement across all stakeholder groups: “...for health needs,” “...using energy safely,” and “keeping a home at a reasonable temperature to stay healthy.” Outliers receiving lesser support arose from the utility stakeholders in the following areas: “keeping the temperature comfortable in a home,” “using energy without fear or anxiety about being disconnected or running out of home heating fuel,” “using energy...in a way that is safe for the environment,” and “using energy for things that keep a family well.” Again, it was determined that the concept of energy uses that are important to make affordable should be clarified in this companion document.

In order to better understand what stakeholders mean by the terms “sustainability” or “sustainable,” question six focused on the concept of sustainability, asking the following: “What does it mean to you to use energy in a sustainable manner? Choose all that apply.” It was evident by the responses that sustainability means different things to different groups. While utility stakeholders were less likely to agree with

statements incorporating the natural environment or cost, there was strong consensus (62-93%) to include concepts of sustainability that incorporate energy use behaviors or selection of appliances as ways to not waste energy.

Finally, the seventh question asked stakeholders to choose between two phrases in response to the following question: “When considering my home energy for heating, cooling, and other uses, which phrase do you think best describes energy as ‘able to be afforded’?” With 58% consensus, respondents agreed on the following phrase: “My household has the resources to meet their home energy needs.”

Conclusion

By the May 2022 meeting, the definition had been finalized as follows for recommendation to the Commission:

A household has the resources to meet their home energy needs for heating, cooling and other uses in a healthy, sustainable and energy efficient manner without compromising a household’s ability to meet other basic needs.

Discussion turned to a companion document. Because there were concepts included in the definition that still posed the potential for multiple meanings, the Subcommittee agreed that a companion document would be designed to explain the concepts and describe the process by which the definition was established. June and July 2022 Subcommittee meetings were used as an opportunity for the Subcommittee to discuss the contents of the companion document and finalize it for presentation by the Subcommittee to Michigan’s Low Income Energy Policy Board at their August 2022 meeting in preparation for recommendation to the Commission. The Subcommittee hopes that its efforts will contribute to policy and program advancements toward the improvement of energy affordability in Michigan.

APPENDIX – Stakeholder Survey Responses

| Q1 | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-------------------|------------------------|-----------|
| In thinking about how much energy costs, what is the best way to describe “having a cost that is not too high?” Choose the option you like best. | | | | |
| | Human Service Agencies | Utility Providers | Advocacy Organizations | Aggregate |
| Energy is affordable when I can pay my bill on time | 5.06% | 6.25% | 0.00% | 4.66% |
| | 16 | 1 | 0 | 17 |
| Energy is affordable when paying my bill doesn’t impact my ability to meet other basic needs | 54.43% | 75.00% | 45.45% | 54.52% |
| | 172 | 12 | 15 | 199 |
| Energy is affordable when I get assistance to pay my bill | 8.86% | 0% | 3.03% | 7.95% |
| | 28 | 0 | 1 | 29 |
| | 2.53% | 0% | 9.09% | 3.01% |

| | | | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------|--------|--------|
| Energy is affordable when I can keep my service connected | 8 | 0 | 3 | 11 |
| Energy is affordable when I receive good value for the money I spend on my energy bills | 4.43% | 0% | 15.15% | 5.21% |
| | 14 | 0 | 5 | 19 |
| Energy is affordable when I can pay bills for things I really need and have a small amount for things I want | 11.71% | 6.25% | 12.12% | 11.51% |
| | 37 | 1 | 4 | 42 |
| Energy is affordable when I have better control over how much I use | 9.81% | 12.50% | 9.09% | 9.86% |
| | 31 | 2 | 3 | 36 |
| Other (please specify) | 3.16% | 0% | 6.06% | 3.29% |
| | 10 | 0 | 2 | 12 |
| Total Responses | 316 | 16 | 33 | 365 |
| Other (specified) | | | | |
| When it doesn't cost so much per unit. | | | | |
| Energy is affordable when I am not forced to choose between it and food. | | | | |
| All of the above! | | | | |
| I always struggle to pay my energy bill. Should be based on income. | | | | |
| My energy is almost 300 a month and I live in a house trailer. [Energy Company] is the only supplier in our area and they over charge everyone. | | | | |
| Energy is not affordable in Michigan. | | | | |
| 1,2,4,5,6 on time, no impact, keep connected, good value, have money left over. | | | | |
| Energy is affordable when I receive it at a good value, and it doesn't break "the bank" or have to pick one bill to pay over another. | | | | |
| Energy is affordable when the means to pay for it are no longer at the forefront of my worries, is affordable when I control consumption better and lastly, when paying for it doesn't mean having to choose between a roof, clean running water, nourishment, clothing and warmth. | | | | |
| Energy is affordable when the heat, electric, water, housing are not more than 1/3 of total income. | | | | |

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| Q2 | | | | |
| Would you agree that having a home that is energy efficient can help with energy affordability? | | | | |
| | Human Service Agencies | Utility Providers | Advocacy Organizations | Aggregate |
| Yes | 94.32% | 100.00% | 100% | 95.08% |

| | | | | |
|-----------------|-------|----|----|-------|
| | 299 | 16 | 33 | 348 |
| No | 2.21% | 0 | 0 | 1.91% |
| | 7 | 0 | 0 | 7 |
| Unsure | 3.47% | 0 | 0 | 3.01% |
| | 11 | 0 | 0 | 11 |
| Total Responses | 317 | 16 | 33 | 366 |

| | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|--------------------------|-------------------------------|------------------|
| Q3 | | | | |
| Which of the following things do you think helps with making utility bills more affordable for households? Please rank them with #1 having the greatest impact. | | | | |
| | Human Service Agencies | Utility Providers | Advocacy Organizations | Aggregate |
| Having kitchen and laundry appliances that are energy efficient (score) | 2.99 | 2.19 | 2.84 | 2.67 |
| Number of responses | 290 | 16 | 32 | 338 |
| Having good insulation in the roof & walls | 5.04 | 5.56 | 5.34 | 5.31 |
| Number of responses | 290 | 16 | 32 | 338 |
| Dialing down the thermostat during the winter or up during the summer (score) | 2.67 | 3.25 | 2.82 | 2.91 |
| Number of responses | 292 | 16 | 33 | 341 |
| Having energy efficient windows and/or window coverings (score) | 4.06 | 3.38 | 3.94 | 3.79 |
| Number of responses | 294 | 16 | 33 | 343 |
| Being careful in how to use heat, lights and electronic devices, and appliances | 2.89 | 3.5 | 2.16 | 2.85 |
| Number of responses | 293 | 16 | 32 | 341 |
| Having a good high efficiency furnace | 3.54 | 3.13 | 4.09 | 3.59 |

| | | | | |
|---------------------|-----|----|----|-----|
| Number of responses | 303 | 16 | 33 | 352 |
|---------------------|-----|----|----|-----|

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|--------------------------------------------------------------------------------------------|-------------------------------|--------------------------|-------------------------------|------------------|
| Q4 | | | | |
| Do you think that a discussion of energy affordability should include health and wellness? | | | | |
| | Human Service Agencies | Utility Providers | Advocacy Organizations | Aggregate |
| Yes | 80.32% | 43.75% | 96.97% | 80.22% |
| | 253 | 7 | 32 | 292 |
| No | 19.68% | 56.25% | 3.03% | 19.78% |
| | 62 | 9 | 1 | 72 |
| Total Responses | 315 | 16 | 33 | 364 |

| | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|--------------------------|-------------------------------|------------------|
| Q5 | | | | |
| Which of the following energy uses are important to make affordable? Choose all that apply. | | | | |
| | Human Service Agencies | Utility Providers | Advocacy Organizations | Aggregate |
| Using energy or power for health needs. Examples include ventilation, cooling, running medical equipment, virtual medical appointments, etc. | 71.29% | 75.00% | 90.91% | 73.22% |
| | 226 | 12 | 30 | 268 |
| Using energy safely. Examples include avoiding things like cold drafts, carbon monoxide from damaged furnaces, faulty wiring, etc. | 79.50% | 81.25% | 93.94% | 80.87% |
| | 252 | 13 | 31 | 296 |
| | 72.24% | 75.00% | 81.82% | 73.22% |

| | | | | |
|-------------------------------------------------------------------------------------------------------------------------------------------|--------|--------|--------|--------|
| Keeping a home at a reasonable temperature to stay healthy | 229 | 12 | 27 | 268 |
| Keeping the temperature comfortable in a home | 53.00% | 31.25% | 51.52% | 51.91% |
| | 168 | 5 | 17 | 190 |
| Using energy in my home in a way that is safe for the environment | 50.79% | 25.00% | 81.82% | 52.46% |
| | 161 | 4 | 27 | 192 |
| Using energy without fear or anxiety about energy being disconnected or running out of home heating fuel | 78.23% | 43.75% | 81.82% | 77.05% |
| | 248 | 7 | 27 | 282 |
| Using energy for things that keep a family well. Examples include virtual schooling, communication, exercise equipment, and entertainment | 54.57% | 31.25% | 69.70% | 54.92% |
| | 173 | 5 | 23 | 201 |
| None of the above | 0.63% | 0.00% | 0.00% | 0.55% |
| | 2 | 0 | 0 | 2 |
| Total Responses | 317 | 16 | 33 | 366 |

| | | | | |
|----------------------------------------------------------------------------------------|-------------------------------|--------------------------|-------------------------------|------------------|
| Q6 | | | | |
| What does it mean to you to use energy in a sustainable manner? Choose all that apply. | | | | |
| | Human Service Agencies | Utility Providers | Advocacy Organizations | Aggregate |
| That I am using energy in a way that | 54.92% | 50.00% | 90.63% | 57.85% |
| | 173 | 8 | 29 | 210 |

| | | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------|--------|----|--------|
| is safe for the environment | | | | | |
| That my energy supply will not be shutoff | 40.95% | 18.75% | 43.75% | | 40.22% |
| | 129 | 3 | 14 | | 146 |
| That I am not using fossil fuels | 21.59% | 12.50% | 65.63% | | 25.07% |
| | 68 | | 2 | 21 | 91 |
| That I will continue to be able to afford my energy | 60.95% | 12.50% | 62.50% | | 58.95% |
| | 192 | 2 | 20 | | 214 |
| When I operate appliances and lighting in my home, I take care to avoid wasting energy | 69.21% | 93.75% | 71.88% | | 70.52% |
| | 218 | | 15 | 23 | 256 |
| When I make appliance purchases, I choose the most efficient model to help save energy in my home. Examples include washer, dryer, furnace, air conditioning unit, stove, refrigerator, etc. | 60.63% | 62.50% | 65.63% | | 61.16% |
| | 191 | 10 | 21 | | 222 |
| Total Responses | 315 | 16 | 32 | | 363 |

| | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|--------------------------|-------------------------------|------------------|
| Q7 | | | | |
| When considering home energy for heating, cooling, and other uses, which phrase do you think best describes energy as "able to be afforded?" | | | | |
| | Human Service Agencies | Utility Providers | Advocacy Organizations | Aggregate |
| My household has the resources to meet their home energy needs | 57.74% | 62.50% | 54.84% | 57.70% |
| | 179 | 10 | 17 | 206 |
| My household's home energy needs are being met | 42.26% | 37.50% | 45.16% | 42.30% |
| | 131 | 6 | 14 | 151 |
| Total Responses | 310 | 16 | 31 | 357 |

ⁱ EAAC – Energy Affordability and Accessibility Collaborative

ⁱⁱ MPSC – Michigan Public Service Commission

ⁱⁱⁱ MEAP -Michigan Energy Assistance Program

^{iv} IRP – Integrated Resource Plan

^v EWR – Energy Waste Reduction

^{vi} COPD - Chronic obstructive pulmonary disease

^{vii} PUC – Public Utilities Commission, California

^{viii} BGE – Baltimore Gas and Electric Company