STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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| In the matter, on the Commission's own motion, to establish a workgroup to investigate appropriate financial incentives and penalties to address outages and distribution performance moving forward. | ) ) ) ) ) | Case No. U-21400 |

At the August 23, 2023 meeting of the Michigan Public Service Commission in Lansing, Michigan.

PRESENT: Hon. Daniel C. Scripps, Chair
Hon. Katherine L. Peretick, Commissioner
Hon. Alessandra R. Carreon, Commissioner

**ORDER**

In the April 24, 2023 order in Case No. U-21400 (April 24 order), the Commission established the Financial Incentives and Disincentives workgroup as part of the MI Power Grid Initiative. April 24 order, p. 12. The April 24 order outlined the initial focus of the workgroup as "developing metrics relating to reliability including, but not limited to, SAIDI [system average interruption duration index] (including and excluding MEDs [major event days]), SAIFI [system average interruption frequency index], CEMI [customers experiencing multiple interruptions], CAIDI [customer average interruption duration index], and resilience, including, but not limited to, downed wire response and the frequency and duration of outages during extreme weather, [using] the recently updated Service Quality [and Reliability Standards for Electric Distribution Systems] rules as a baseline." *Id*.

In order to facilitate stakeholder discussion on these issues, the Commission developed a straw proposal, attached to this order as Exhibit A, identifying candidate distribution performance metrics and applicable methods by which incentives and disincentives may be applied. Prior Commission decisions, annual filings, and recent distribution plan filings informed this development.

The Commission invites interested persons to comment on the straw proposal. Of particular interest to the Commission is reaction to the candidate metrics, the proposed target performance identified for each metric, and the potential incentive/disincentive mechanisms to be applied to each metric. In addition, the Commission is interested in any alternative metrics or approaches to those identified in the straw proposal.

Written and electronic comments on the straw proposal are due no later than 5:00 p.m. (Eastern time (ET)) on September 22, 2023. Written and electronic reply comments must be received no later than 5:00 p.m. (ET) on October 20, 2023. The written and electronic comments should reference Case No. U-21400. Written comments and reply comments should be mailed to: Executive Secretary, Michigan Public Service Commission, P.O. Box 30221, Lansing, MI 48909. Comments submitted in electronic format may be filed via the Commission's E-Docket website, or for those persons without an E-dockets account, via e-mail to mpscedockets@michigan.gov. Any person requiring assistance prior to filing may contact the Commission Staff (Staff) at (517) 284-8090 or by e-mail at mpscedockets@michigan.gov. All comments submitted to the Commission in this matter will be filed in Case No. U-21400 and will become public information available on the Commission's website and subject to disclosure.

Further, the Commission directs the Staff to schedule a stakeholder session to convene following the initial comment period to discuss the straw proposal and alternative approaches.

THEREFORE, IT IS ORDERED that:

A. Any interested person may file comments in Case No. U-21400 regarding the straw proposal attached to this order as Exhibit A. Comments must be received no later than 5:00 p.m. (Eastern time) on September 22, 2023. Reply comments must be received no later than 5:00 p.m. (Eastern time) on October 20, 2023.

B. The Commission Staff shall convene a stakeholder session following the initial comment period to discuss the straw proposal and alternative approaches.

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

MICHIGAN PUBLIC SERVICE COMMISSION

Daniel C. Scripps, Chair

Katherine L. Peretick, Commissioner

Alessandra R. Carreon, Commissioner

By its action of August 30, 2023.

Lisa Felice, Executive Secretary

# Draft Performance-Based Regulatory Framework

## Straw Proposal for Reliability Metrics

## Background

On April 24, 2023, the Michigan Public Service Commission ("MPSC" or "Commission") issued the opening order in Case No. U-21400 (April 24 order), which directed Commission Staff to convene a Financial Incentives and Disincentives workgroup as part of the MI Power Grid Initiative and file a report of the workgroup's investigations and findings by December 31, 2023.

In directing this action, the Commission referred to numerous prior decisions to address distribution system reliability and safety. The opening order also stated, "an initial focus of the Financial Incentives and Disincentives workgroup shall include developing appropriate metrics relating to reliability including, but not limited to, SAIDI [System Average Interruption Duration Index] (including and excluding MEDs [major event days]), SAIFI [System Average Interruption Frequency Index], CEMI [Customers Experiencing Multiple Interruptions], CAIDI [Customer Average Interruption Duration Index], and resilience, including, but not limited to, downed wire response and the frequency and duration of outages during extreme weather, and shall use the recently updated Service Quality rules as a baseline."[1]

## Purpose of this Document

The Commission presents this straw proposal to foster discussion on distribution system reliability metrics and incentive/disincentive mechanisms that can track and encourage reliability improvements. The proposal was developed by reviewing prior Commission decisions, annual filings to the MPSC, and recent filings on distribution system plans. The concepts put forward in this document reflect a starting point for discussion among workgroup participants and not a final decision of the MPSC.

This remaining sections in this document:

- Discuss high-level observations on the current state of distribution system reliability in Michigan;
- Propose candidate performance metrics for further discussion by workgroup; and
- Present a straw proposal for performance targets and[2] incentive/ disincentive mechanisms to address distribution system reliability.

## Observations on the Current State of Distribution System Reliability

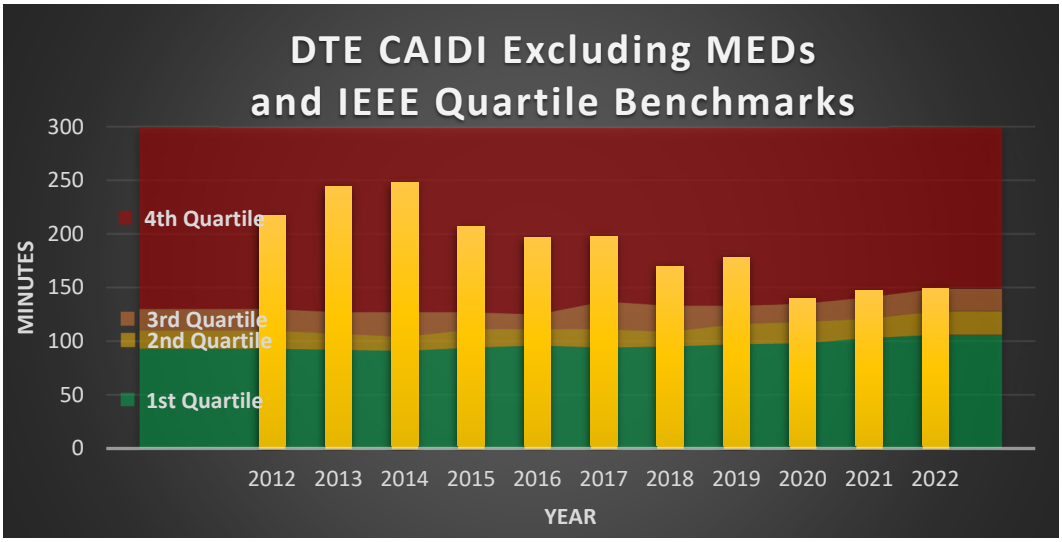
**Michigan Customers Experience High Outage Duration**

[1] See April 24 order at p. 12. For reference, SAIDI, SAIFI, CEMI, and CAIDI are electric utility reliability metrics defined by the Institute of Electrical and Electronics Engineers ("IEEE").

[2] The Commission has initially focused on DTE and Consumers Energy in this straw proposal and expects to discuss applicability to other utilities with the workgroup members.

The MPSC currently collects utility service quality data through annual reports by utilities and presents this information on the Commission's website.[3] Two measures of outage duration (SAIDI and CAIDI) show that DTE and Consumers have ranged in the 3rd/4th quartiles for past 10 years when excluding MEDs. The graph below is available on the MPSC website and presents historical data for CAIDI.

Figure 1 – Comparison of DTE CAIDI to Industry Benchmarks from 2012-2022



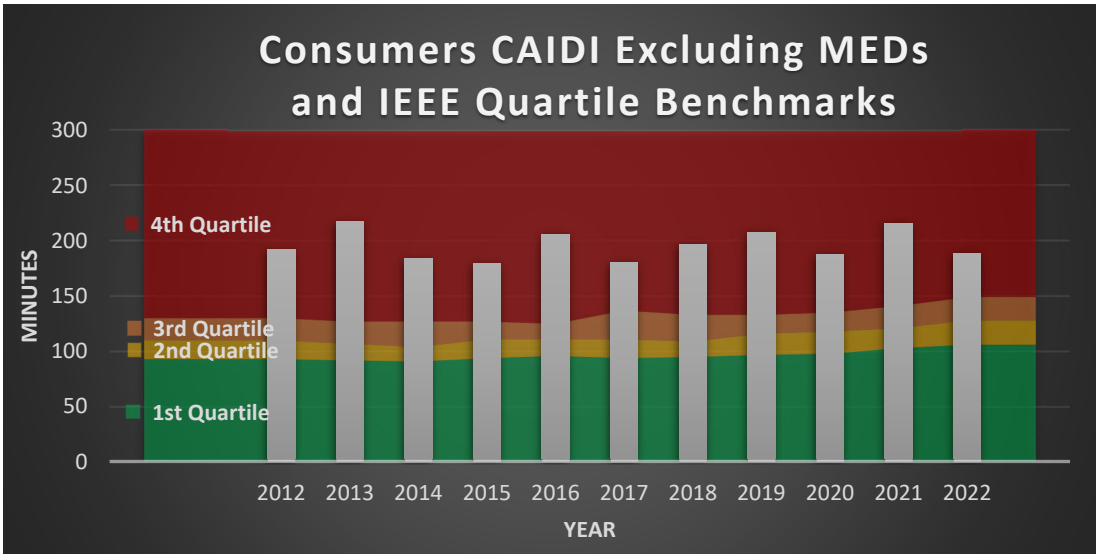

Note: Metric information presented excludes Major Event Days (MEDs)

The figure compares DTE's CAIDI, which measures the average time to restore service to a customer after a sustained interruption,[4] to industry benchmarks developed by an annual survey performed by the IEEE. The figure shows that DTE's performance has improved in recent years but remains in the 4th quartile throughout the 10-year period.

[3] See reliability metric information here: https://www.michigan.gov/mpsc/consumer/electricity/distribution-system-reliability-metrics.

[4] According to the IEEE definition, a sustained interruption lasts over five (5) minutes.

Figure 2 – Comparison of Consumers Energy CAIDI to Industry Benchmarks from 2012-2022




Note: Metric information presented excludes Major Event Days (MEDs)

Figure 2 shows the same metric and comparison to industry benchmarks for Consumers Energy. The reported data show that Consumers Energy performance on CAIDI has remained in the 4th quartile during the entire period.

The MPSC website also displays similar comparisons for SAIDI, which is another common metric to measure outage duration. In reviewing these data, DTE and Consumers have generally performed in the 3rd and 4th quartiles compared to other utilities.

In contrast to outage duration, SAIFI show that DTE and Consumers Energy have consistently performed in the 1st and 2nd quartiles compared to other utilities. When including interruptions from MEDs, SAIFI increases moderately but not as significantly as duration metrics, which are discussed below.[5]

**Increase in Outage Duration from Storm Events is Considerably Greater than Industry Benchmarks**

The utilities' reliability metrics are reported including and excluding "MEDs."[6] Understandably, utility reliability metrics increase (higher levels of interruptions and outage duration) when including all weather events. Traditionally, MEDs are excluded from utility performance evaluations because these events are weather-driven and not fully in control of utility actions.

In reviewing Michigan's outage duration metrics, the relative increase from storms or "all weather" events is much greater than industry benchmarks. Looking at the difference between CAIDI (all weather) and CAIDI (excluding MEDs) isolates the reliability impact of MEDs. In reviewing the differences in these reliability metrics reported over the past decade, the following is observed:

[5] See reliability information reported on the MPSC website - https://www.michigan.gov/mpsc/consumer/electricity/distribution-system-reliability-metrics.

[6] IEEE standard 1366-2012 recommends a statistical method to determine Major Event Days for reliability indices ("2.5 Beta Method").

- For Consumers and DTE, CAIDI (all weather) has averaged over 100% CAIDI (excluding MEDs) for the past decade;
- The median values for the industry benchmark have averaged just over a 40% increase in CAIDI from MEDs; and
- Both utilities are in the 4th quartile for the relative increase in CAIDI from major events/storms.

The impact of storm events on reliability and "all weather" metrics are important measures because they best reflect customers' experience under all conditions and poor reliability performance during storm events can overshadow improvements in other measures. The straw proposal presented in this framework document proposes to track reliability performance separately during major events and the traditional measure excluding these events. The combined measures still gauge overall reliability performance while addressing the different circumstances and options available to utilities during these diverse weather conditions.

**Certain Customers and Locations Experience Repeated and Lengthy Outages**

Michigan utilities also report on reliability metrics that reflect more localized reliability performance. These metrics include $CEMI_n$ (Customers Experiencing Multiple Interruptions of n or more), CELID (Customers Experiencing Long Interruption Durations), and 10 worst performing circuits in service territory. In reviewing this information, the MPSC makes the following observations:

- Data reported by utilities show over 16,000 (DTE) and close to 20,000 customers (Consumers) experiencing over 7 outages a year ($CEMI_7$ metric);
- Both utilities also report the worst performing circuits but use multiple metrics, which highlight diverse reliability challenges;
- DTE ranked worst circuits using SAIDI and SAIFI on a system- and circuit-basis;
- System-level basis generally highlighted long circuits where outages affect large number of customers;
- Circuit-level basis generally highlighted shorter circuits with very high interruptions and outage duration; and
- Consumers ranked circuits based on circuit-level SAIDI excluding MEDs.

As stated in prior orders, the Commission remains concerned that Michigan utilities continue to perform in the 4th quartile on key reliability metrics, particularly outage duration. Furthermore, certain customers experience worse service reliability than the system-wide measures indicate. This proposal identifies candidate metrics and potential performance targets to improve reliability. In addition, where feasible and applicable, the document outlines proposed incentive/disincentive mechanisms for review and feedback from the workgroup.

## Candidate Reliability Performance Metrics

The Commission has reviewed recent filings and identified several candidate performance metrics based on persistent concerns with reliability of utility distribution systems. The initial candidate metrics include the following areas:

- CAIDI (all weather), CAIDI (excluding MEDs), and CAIDI (only MEDs);

- SAIFI (all weather) and SAIFI (excluding MEDs);
- $CEMI_4$ and $CEMI_7$; and
- Worst performing circuits ranked by circuit-level SAIDI.

*CAIDI metrics* - The Commission prioritizes these metrics because outage duration in Michigan remains high relative to industry benchmarks, and CAIDI provides a meaningful and intuitive measure of customer experience (average time to restore customer's power after an interruption). The MPSC still intends to monitor other reliability metrics, but the Commission identifies developing targets and incentive/disincentive mechanism(s) for CAIDI as a priority for further discussion among stakeholders.

*SAIFI metrics* – Outage frequency is another important measure of customer experience, and the Commission expects SAIFI to improve as utilities invest in their distribution systems. Therefore, the Commission identifies SAIFI as a candidate performance metric for discussion with stakeholders in this workgroup.

*CEMI* - The MPSC has identified CEMI as a candidate metric to address the subset of customers that experience more frequent interruptions than the system average metrics indicate. Furthermore, the Commission has already established $CEMI_4$ as a metric for service quality standards. The Commission is interested in discussing with the workgroup how a performance target and incentive/disincentive mechanism for CEMI metrics can prompt further actions to improve reliability for customers currently experiencing high levels of interruptions.

*Worst performing circuits* - In the Annual Power Quality Reports, utilities currently detail their 10 worst performing circuits. The Commission identifies circuit-level reliability performance as another candidate metric to establish performance targets and potential incentive/disincentive mechanisms to address areas with persistent reliability problems.

This section briefly summarized the candidate metrics and basis for selection. Below, the Commission outlines a conceptual straw proposal on performance targets and potential incentive/disincentive mechanisms for these metrics.

# Straw Proposal on Performance Targets and Incentive/Disincentive Mechanisms

Table 1 summarizes the proposed metrics, current performance for Michigan's two largest utilities, potential target levels for each metric, and incentive/disincentive mechanism for consideration by the workgroup.

**Table 1: Straw Proposal for Candidate Performance Metrics**

| | 2022 Performance | | Target Performance | | Potential Incentive/Disincentive Mechanism |
|---|---|---|---|---|---|
| **Metric** | DTE | Consumers | Interim | Long-Term | |
| CAIDI (Excluding MEDs, in minutes) | 149 (2022 value) | 189 (2022 value) | Stakeholder feedback; informed by DSP | 118 (Median, 5-yr avg.) | Symmetric incentive/disincentive |
| CAIDI (Only MEDs) | 298 (5-yr. average) | 235 (5-yr. average) | 135 (3rd/4th quartile, 5-yr average) | 62 (2nd/3rd quartile, 5-yr average) | Symmetric incentive/disincentive |
| SAIFI (Excluding MEDs) | 0.98 | 0.96 | Stakeholder feedback; informed by DSP | 0.86 (1st/2nd quartile, 5-yr average) | Symmetric incentive/disincentive |
| $CEMI_4$ (Customer count) | 163,417 | 173,273 | TBD | <5% of customers by 2030 | Penalty |
| $CEMI_7$ (Customer count) | 16,262 | 19,821 | TBD | Industry benchmark | Penalty |
| Worst performing circuits | Reports use multiple metrics | Reports by Circuit-level SAIDI (no MEDs) | No circuits remain on list for more than 2 of past 5 years | No circuits remain on list for more than 2 of past 5 years | Penalty |

In this proposal, the CAIDI all-weather metric is divided into the traditional measure of CAIDI (excluding MEDs) and a separate CAIDI metric including only MEDs. This split collectively measures performance under all weather conditions but allows different benchmarks and incentive mechanisms for each component. This separation helps manage the higher uncertainty in the measure including only MEDs. A more detailed description of the straw proposal by each metric follows below.

**CAIDI (excluding MEDs)**

*Metric description* – Under this proposal, one component of measuring outage response includes the traditional measure of reporting CAIDI excluding MEDs. The utilities currently report this information to

the MPSC and the annual value would be assessed relative to a trajectory of target performance that includes stakeholder feedback in this process and informed by each utility's distribution system plan (DSP).

*Current performance* – The table shows that the 2022 annual values for DTE and Consumers were 149 and 189 minutes, respectively. For both utilities, these CAIDI values are in the 4th quartile according to the 2022 IEEE utility benchmarking study.

*Target performance* – The interim targets should be informed by the 2021 and 2023 distribution system plans. This proposal presents the median industry benchmark as a long-term target. Using current IEEE information, the median value was 118 minutes. The Commission presents these benchmarks for further discussion and feedback from stakeholders in the workgroup.

*Incentive/Disincentive Mechanism* – For this metric, the Commission is considering utilizing the symmetric incentive design proposed by the utilities in the 2021 DSPs. The target improvement trajectory would be set by the Commission and informed by analysis on expected system improvements in the DSP. The mechanism would utilize a deadband around the target before an incentive or penalty would be triggered. Consistent with the earlier proposals, the Commission suggests a symmetric deadband around the target based on one standard deviation using historical performance.

**CAIDI (only MEDs)**

*Metric description* – Under this approach, the Commission would adopt the 5-yr. rolling average of CAIDI measured only during MEDs, where CAIDI (only MEDs) is calculated using the duration of only MEDs, and excludes non-MEDs. The intention is to measure the average impact of major events on outage duration and improve this response over time.

*Current performance* – The table shows current performance by both utilities, which is in the 4th quartile of the IEEE utility benchmarking study.

*Target performance* – Table 1 shows two potential targets based on utility benchmarks for median performance (62 mins) and 3rd/4th quartile threshold (135 mins). Under either benchmark, utility performance is still far above the thresholds (higher values are worse performance). Therefore, interim values for this metric will require further discussion by the workgroup and should be informed by improvement plans in the next DSPs.

*Incentive/Disincentive Mechanism* – This straw proposal presents CAIDI (only MEDs) as a symmetric mechanism. While there is an understanding that storm events are not under utility control, data show these events are becoming more frequent and severe. Furthermore, utility investments to prepare for these events and response during the events are under the utility's purview. The disparity in reliability outcomes between storm events and normal conditions for major Michigan utilities is significant and this outcome needs greater focus and attention. By bifurcating the measurement and incentive mechanisms for non-MED and MED events, the proposal attempts to address both overall CAIDI and the experience of customers during major storm events. The Commission understands this is potentially a novel measure for Michigan's utilities, and the industry generally. Therefore, the Commission expects to monitor how this metric works in practice as it connects the metric to financial measures.

**SAIFI (excluding MEDs)**

*Metric description* – This proposal includes SAIFI (excluding MEDs) as a performance metric. While SAIFI also increases during major events, the change is not as significant. Furthermore, the current basis of information to set targets and incentive/disincentive mechanism is stronger for SAIFI without MEDs. Therefore, this proposal presents this metric as a starting point for discussion on interruption frequency.

*Current performance* – The table shows current performance by both utilities, which is in the 2nd quartile using the IEEE utility benchmarking study.

*Target performance* – Interim target values would be established by the Commission and informed by analysis of SAIFI improvements in the next distribution system plans. The long-term target represents the threshold of $1^{st}/2^{nd}$ quartiles and 5-yr average of IEEE benchmarking data.

*Incentive/Disincentive Mechanism* – This performance metric would have a similar symmetric incentive mechanism as CAIDI (excluding MEDs).

**$CEMI_4$**

*Metric description* – This metric measures the number of customers that experience four or more sustained interruptions. The current service quality rules state that:

- From the effective date of these rules until December 31, 2029, considering data derived through the amalgamation of data from all conditions, not more than 6% of an electric utility's or cooperative's customers may experience 4 or more sustained interruptions in a calendar year.
- Beginning January 1, 2030, considering data derived through the amalgamation of data from all conditions, not more than 5% of an electric utility's or cooperative's customers may experience 4 or more sustained interruptions in a calendar year.

*Current performance* – Utilities currently report this information to the MPSC in the Annual Power Quality Service Reports. In 2022, DTE had 163,417 customers and Consumers had 173,273 with $CEMI_4$.

*Target performance* – The Commission would like the workgroup to discuss an interim target for this metric because current distribution system plans have not analyzed projected improvements for $CEMI_4$. As a long-term goal, the service quality rules already establish a target of <5% of customers by 2030.

*Incentive/Disincentive Mechanism* – This straw proposal presents this mechanism as a penalty only for customers experiencing this level of interruption, which could be set as a bill credit for customers.

**$CEMI_7$**

*Metric description* – This metric measures the number of customers that experience seven or more sustained interruptions. The Commission is interested in addressing customers that experience a high number of interruptions each year and identified an initial threshold of 7 outages for further review and discussion with the workgroup.

*Current performance* – Utilities currently report this information to the MPSC in the Annual Power Quality Service Reports. In 2022, DTE had 16,262 customers and Consumers had 19,821 with $CEMI_7$.

*Target performance* – The Commission would like the workgroup to discuss interim and long-term targets for this metric because current distribution system plans have not analyzed impacts for $CEMI_7$.

*Incentive/Disincentive Mechanism* – This straw proposal presents a penalty-only mechanism for customers experiencing this level of interruption, which could be set as a bill credit for customers.

**Worst-Performing Circuits**

*Metric description* – The Commission proposes to focus on circuit-level SAIDI (excluding MEDs) to rank each utility's 10 worst-performing circuits. Each utility current reports this information.

*Current performance* – Utilities currently provide this information to the MPSC in the Annual Power Quality Service Reports.

*Target performance* – For an initial discussion with the working group, the target performance is that circuits do not rank in the top 10 for more than 2 years within the past 5 years.

*Incentive/Disincentive Mechanism* – Under this conceptual proposal, utilities would be penalized if a circuit ranked in the top 10 for 3 or more years within the past 5 years. This penalty could be assessed as a bill credit to customers on the affected circuits.

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

STATE OF MICHIGAN )

Case No. U-21400

County of Ingham )

Brianna Brown being duly sworn, deposes and says that on August 30, 2023 A.D. she electronically notified the attached list of this **Commission Order via e-mail transmission**, to the persons as shown on the attached service list (Listserv Distribution List).

Brianna Brown

Subscribed and sworn to before me
this 30th day of August 2023.

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

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