STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter, on the Commission's own motion, regarding the regulatory reviews, revisions, determinations and/or approvals necessary for **DTE ELECTRIC COMPANY** to comply with Section 61 of 2016 PA 342.	)	Case No. U-18352

At the February 21, 2019 meeting of the Michigan Public Service Commission in Lansing, Michigan.

PRESENT: Hon. Sally A. Talberg, Chairman
Hon. Norman J. Saari, Commissioner

ORDER

History of Proceedings

On December 21, 2016, Public Act 342 of 2016 (Act 342) was signed into law and became effective on April 20, 2017. Among other things, Act 342 amends 2008 PA 295, MCL 460.1001 *et seq*., by adding Section 61, MCL 460.1061 (Section 61), which requires electric providers to offer voluntary green pricing (VGP) programs to their customers. Section 61 states:

> An electric provider shall offer to its customers the opportunity to participate in a voluntary green pricing program under which the customer may specify, from the options made available by the electric provider, the amount of electricity attributable to the customer that will be renewable energy. If the electric provider's rates are regulated by the commission, the program, including the rates paid for renewable energy, must be approved by the commission. The customer is responsible for any additional costs incurred and shall accrue any additional savings realized by the electric provider as a result of the customer's participation in the program. If an electric provider has not yet fully recovered the incremental costs of compliance, both of the following apply:

> (a) A customer that receives at least 50% of the customer's average monthly electricity consumption through the program is exempt from paying surcharges for incremental costs of compliance.
>
> (b) Before entering into an agreement to participate in a commission-approved voluntary green pricing program with a customer that will not receive at least 50% of the customer's average monthly electricity consumption through the program, the electric provider shall notify the customer that the customer will be responsible for the full applicable charges for the incremental costs of compliance and for participation in the voluntary renewable energy program as provided under this section.

Procedural History

On March 28, 2017, the Commission issued an order in Case Nos. U-18349 *et al*. (March 28 order) that, among other things, directed electric providers and other interested parties to provide input to the Commission on what the VGP programs should contain. March 28 order, p. 2. Comments were due by April 28, 2017, and reply comments were due by May 30, 2017. Comments on the minimum requirements were filed by eight electric providers, and a number of other interested parties provided suggestions as to how the VGP programs should be structured and evaluated by the Commission.

The Commission issued a subsequent order in these matters on July 12, 2017, providing guidance to the utilities as to what to include in their Section 61 proposals and the criteria by which the Commission would evaluate the merits of the proposed programs. On October 18, 2017, in its assigned docket, Case No. U-18352, DTE Electric Company (DTE Electric) filed its initial VGP application followed by a revised application on January 16, 2018. Following a contested proceeding, the Commission issued an order on October 5, 2018, in Case No. U-18352 (October 5 order). In the October 5 order, the Commission directed DTE Electric to phase out its Green Currents program and rejected the company's proposed Section 61 program, MIGreenPower. October 5 order, pp. 12-13, 18. The Commission explained that there was inadequate information on the record to respond to the Commission's concerns regarding the transparency of the program's costs, particularly its administrative and marketing costs, and the high overall cost relative to other Michigan electric providers' VGP programs. *Id*., p. 18. The Commission also raised other areas of concern in need of redress including the program enrollment cap set at 150,000 megawatt-hours (MWh), the lack of VGP options and plans to expand the program proposed by the company, and the need for forecasting and market studies to gain a better understanding of customer needs and preferences for VGP programs. *Id*., pp. 18-31. The Commission directed the Commission Staff (Staff) to conduct a review of the overall costs of the MIGreenPower program, with particular attention to its administrative and marketing costs, and to file a report on its findings and recommendations in this docket within 90 days from the date of the October 5 order. DTE Electric was also directed to file a revised MIGreenPower program or an application for a VGP program to replace MIGreenPower in this docket within 120 days from the date of the October 5 order.

On December 20, 2018, the Staff complied with the Commission's directive and filed its report, which is discussed below. DTE Electric complied with the October 5 order by filing an application for approval of a Large Customer VGP (LC-VGP) program in Case No. U-20343, which was approved by the Commission as a pilot program on January 18, 2019, and by filing an amended application for approval of a revised MIGreenPower program on February 4, 2019, in this docket. January 18, 2019 order in Case No. U-20343, pp. 4-6.

<u>The Commission Staff Report</u>

In accordance with the Commission's directive in the October 5 order, the Staff conducted a review of DTE Electric's MIGreenPower program focusing on its overall costs and examining the administrative and marketing costs embedded in the program. The Staff filed its *Findings* *and Recommendations on the MIGreenPower Pilot Program* (Staff Report) on December 20, 2018. The Staff examined the $0.072 per kilowatt-hour (kWh) subscription fee and found that the $0.07 component was based on forecasted wind and solar generation estimated from the Pinnebog Wind Farm and the Lapeer Solar facility. Staff Report, p. 7. The Staff also looked at the administrative and marketing costs included in the subscription fee.

> These costs account for a $0.002 per kWh adder (a total of approximately $3 million of Program IT [information technology]/marketing/administrative budget divided over the kWh) to the subscription fee for a total cost to participating customers of $0.072 per kWh. While not acquiescing the $3 million budget of administrative and marketing expense was appropriate, upon review and subsequent work with the Company, different than what was in its initial testimony, Staff finds the $0.072 per kWh fee, including the $0.002 administrative and marketing expense adder, was calculated correctly by the Company.

Id. The Staff also found that a large portion, approximately $1.18 million, of the total $2.25 million in administrative and marketing expenses were payments to a marketing contractor for outreach, program management, and website development services. *Id*., p. 8. Also noted in the Staff's findings was that many of the concerns about the program's size (referring to the enrollment cap) and sources of renewable energy supply may be alleviated by DTE Electric's LC-VGP program. *Id*., p. 9.

The Staff also made several recommendations to improve the MIGreenPower program beginning with reducing the administrative and marketing costs by focusing marketing efforts on particular customer classes. *Id*., p. 10. Regarding information needed from the company, the Staff suggested that DTE Electric be required to include revenue and cost data in its semi-annual reports and to follow through on its promise to provide a simplified version of its subscription cost calculation to be included in the program's marketing materials. *Id*. The Staff also recommended that the company remove the enrollment cap of 150,000 MWh. *Id*. Next, the

Staff recommended that the company expand the MIGreenPower program, disclose to the Commission its plans for expansion, and take the following steps in procuring future renewable energy assets:

> 1. For new renewable projects which may be added to the program, provide cost options for different ownership models of the program's renewable energy resources, either owned by the Company or by a third party.
>
> 2. Provide a comparison of the MISO [Midcontinent Independent System Operator, Inc.] LMP [locational marginal price] on-peak market prices since approval of the pilot program to the energy portion of the credit, showing all components within the calculation.
>
> 3. Prepare an analysis that includes data on the cost of both residential and commercial customers participating in this program versus purchasing renewable energy outside of a Company program.
>
> 4. As a result of the pilot, consider rebalancing the renewable energy supply by reducing the Pinnebog wind and Lapeer solar percentages and begin adding a portion of new, less costly, renewable energy.

Id.

<u>DTE Electric Company's Revised MIGreenPower Application</u>

On February 4, 2019, DTE Electric filed an application, with supporting testimony and exhibits, seeking Commission approval of its revised MIGreenPower program and accompanying Standard Contract Rider No. 17 as a Section 61 compliant program explaining that it had made several changes that address the Commission's concerns. Those changes include: (1) offering a wind-only option in addition to the blended wind and solar option originally proposed in MIGreenPower, (2) eliminating the 150,000 MWh enrollment cap, (3) eliminating the early termination fee, (4) providing a simplified explanation of the subscription fee and credit calculation on the MIGreenPower webpage, (5) conducting a three-year forecast and, when the forecast indicates when the program will be at least 75% subscribed or fully subscribed, the company will implement plans to add resources to the program, and (6) including revenue and cost data in its semi-annual report. DTE Electric's amended application, pp. 3-5.

In the testimony supporting its application, DTE Electric stated that it added the wind-only option to address the Commission's concerns regarding the lack of options and costs of MIGreenPower. DTE Electric's testimony, pp. 7-10. The wind-only option's subscription fee will be set at $0.052 per kWh, which is a less expensive option compared to the blended wind and solar option's subscription fee of $0.072 per kWh that was originally proposed by the company. *Id*., pp. 9-10. As to the credit associated with the wind-only option, DTE Electric explained that the credit would be less than the blended option because the MISO effective load carry capability (ELCC) for wind is 12.7% as opposed to the ELCC of 33% for wind and solar together. *Id*., p. 10. The net cost to customers who choose the wind-only option will be $0.023 per kWh as opposed to the $0.033 per kWh for the blended option. *Id*. Also, to provide transparency to customers regarding the cost and credit associated with the program, DTE Electric stated that it had added a "detailed explanation" of the subscription fee and credits to the MIGreenPower website. *Id*., p. 17.

With respect to the marketing costs, DTE Electric maintains that the portion of the subscription fee making up administrative and marketing costs is appropriate and will not be altered. *Id*., p. 13. In support, the company points to the Staff's Report which found that the marketing and administrative fee was correctly calculated. *Id*. (citing the Staff Report, p. 7). As to the Staff's recommendation to reduce administrative and marketing costs, DTE Electric responded as follows:

> DTE agrees that the future annual marketing and administrative budget can and will be reduced from previous years' annual spend. The original budget was based on a 2-year pilot with availability of 150,000 MWh, which was expected to

> sell out in those 2 years. For the years after the 2-year pilot, the budget included a nominal $25,000 budget for all remaining years, as outlined in Exhibit A-6 . . . .
>
> DTE has already spent $1.8 million on marketing expenses for the Program (not including DTE internal labor) based on only subscribing customers for the first two years of the pilot program. However, those sunk costs cannot be recovered through an ongoing program with an ongoing marketing and admin[istrative] budget.
>
> The Company proposes to allocate $600,000 per year through 2030, after which it reduces to $100,000. This is a reduction from the marketing costs for the first two years, while maintaining an annual budget to market the Program. This marketing effort will target residential and small commercial customers, as the Company's large customer program will target larger commercial and industrial customers.

Id., pp. 14-15.

As to the company's plans to expand the MIGreenPower program, the company testified that it would utilize a competitive bidding process to add renewable energy assets to the program when necessary. Elaborating on when additional assets would be necessary, DTE Electric explained that on a biennial basis it would conduct a three-year forecast:

> When a 3-year forecast indicates that the Program [will be] sold out, the Company may seek to add assets to the Program, if the asset can be backed by the Company's Renewable Energy Plan [REP] framework.
>
> If assets to be added are outside the [REP] framework, the Company will solicit interest, administer an RFP [request for proposal] for cost effective projects, and will contract for assets when at least 75% of the capacity is confirmed through a customer contract. In this scenario, customers may be required to commit to a contract term to ensure the assets are not abandoned. The Company may explore options similar to the REP framework, such that subscription fees may be levelized and unsubscribed portions of voluntary renewable energy assets are sold to the PSCR [power supply cost recovery] at the levelized cost of energy.

Id., p. 11. In response to the Staff's recommendation to move less expensive renewable energy resources into the MIGreenPower program, DTE Electric stated that it was not inclined to do so as that would penalize non-participating customers by burdening them with the more expensive assets. *Id*., pp. 11-12. The company argued that its non-participating customers should also share in the benefit of more economical renewable energy assets. *Id*. DTE Electric also noted that if lower cost assets were added to supply MIGreenPower, existing subscribers' fees would be adjusted downward accordingly, but that if more expensive assets were added, the associated higher subscription fee would apply only to new enrollees. *Id*.

Discussion

The Commission has reviewed the revised MIGreenPower program and accompanying Standard Contract Rider No. 17 submitted by DTE Electric and finds that the program should be approved as a Section 61 compliant VGP program. Section 61 requires Michigan electric providers to offer VGP program options to their customers in which the customer is responsible for the cost of the program and receives the benefit of any savings realized by the company as a result of the customer's participation. In the December 20, 2017 order (December 20 order) in this docket, the Commission found that VGP programs should meet the following requirements:

> (1) the programs should be cost-of-service based to avoid subsidization by non-participants; (2) the program terms, RE [renewable energy] technologies utilized, location of RE sources, and costs and savings incurred by a customer should be transparent and clearly explained; (3) the program should contain accurate price signals with clearly broken-down costs, especially with respect to marketing and administrative costs; and (4) RE generation under the program must be additional to the 15% requirement under [MCL 460.1028] and separate from the provider's renewable energy plans (REPs), which will require accurate accounting and verification of RECs [renewable energy credits] to avoid overlap.

December 20 order, pp. 3-4. In the October 5 order, the Commission found that DTE Electric's proposed MIGreenPower fell short of these requirements because of the Commission's concerns with the overall cost of the program, particularly the marketing and administrative costs; the transparency in pricing; the lack of options available to meet customers' needs and preferences; the program's enrollment cap; and the lack of plans to expand the program. October 5 order, pp. 12-18.

In its review of the Staff Report's findings and recommendations as well as DTE Electric's revised MIGreenPower program, the Commission finds that its concerns have been adequately addressed. With respect to costs, the company has proposed a lower cost wind-only option with a net cost of $0.023 per kWh that the Commission believes will be an attractive option for customers who wish to purchase renewable energy above the 15% already required under the renewable portfolio standard but also wish to see a lower impact on their monthly utility bills. The wind-only option, as well as the LC-VGP option approved as a pilot program in Case No. U-20343, also address the Commission's concern that DTE Electric was not complying with the requirement to provide a menu of options as set out in the Commission's guidance. While the Commission had concerns regarding the administrative and marketing costs based on the record at the time of the October 5 order, the Commission is satisfied by the Staff's investigation and report finding that these costs were correctly calculated by the company. However, the Commission does agree with the Staff's recommendation that DTE Electric should make efforts to lower these costs and is satisfied that the company's planned expenditures and targeting of marketing efforts will achieve those goals. *See*, DTE Electric's testimony, pp. 13-15. The Commission will continue to review the program's costs, particularly the administrative and marketing costs, in the biennial reviews.

The Commission also finds that DTE Electric's explanation of the breakdown of costs in MIGreenPower's subscription fee as well as the credit provided on the program's website allays the Commission's previous concerns with transparency. While the Staff recommended that DTE Electric also provide a comparison of the energy portion of the MIGreenPower credit to the MISO on-peak LMP, the Commission finds that the explanation of costs provided on the

MIGreenPower website is satisfactory and that the MISO LMP is publicly available information that the Commission will not require the company to provide to its customers.

In its revised application, DTE Electric explained that it would eliminate the 150,000 MWh cap for the revised MIGreenPower program and presented a plan for a three-year forecast done on a biennial basis, to determine when additional resources would be added to the program. The Commission finds the elimination of the cap meets the Section 61 requirements and finds the company's forecast and plans to add resources through its REP resources or through a competitive bidding RFP process to be reasonable. The Commission also agrees with the company's decision not to procure new, less expensive renewable generation at this time to replace the current wind and solar resources supporting MIGreenPower. Moving these resources out of MIGreenPower would place the cost burden on non-participating customers. The Commission agrees that non-participating customers should also share in the benefit of less expensive renewable generation, and when more economical options are ready to be added to MIGreenPower, participating customers will reap those benefits. The Commission's cost concerns have been adequately addressed by the addition of the wind-only option and replacing expensive renewable generation with less expensive generation is not necessary at this time given the current subscription level of the program. However, the Commission will look closely at the company's plans to add renewable resources in a future review when the need for additional resources arises. To aid the Commission in future program reviews, DTE Electric shall include in its semi-annual report revenue and cost data, forecasting and marketing data, and information regarding the performance and evolution of MIGreenPower.

The Commission is also satisfied that other aspects of the program, including the credit and its calculation, the elimination of the renewable energy surcharge for customers subscribing at least 50% of their usage, the elimination of the early termination fee, the tracking of renewable energy credits through the Michigan Renewable Energy Certification System, and the additionality of the MIGreenPower program are compliant with Section 61 and the Commission’s previous directives. As to the biennial review of DTE Electric’s VGP programs, in the October 5 order, the Commission anticipated that the review would take place in October 2019. Given the Commission’s directive for the company to file a revised MIGreenPower program (or an alternative VGP program) and the timing of the instant order, the Commission finds an October 2019 biennial review would now be too soon. The Commission finds that a biennial review in April 2020 will be more appropriate.

THEREFORE, IT IS ORDERED that:

A. DTE Electric Company’s proposed MIGreenPower program and the accompanying Standard Contract Rider No. 17 are approved as a voluntary green pricing program compliant with 2016 PA 342, Section 61, MCL 460.1061.

B. Within 10 days from the date of this order, DTE Electric Company shall file a Standard Contract Rider No. 17 substantially similar to the rider attached as Exhibit A and consistent with this order.

C. DTE Electric Company shall file in this docket a semi-annual report on its voluntary green pricing programs including the details discussed in this order. The first report shall be filed on April 1, 2019, and the second report shall be filed on October 1, 2019. DTE Electric Company shall file the semi-annual voluntary green pricing program report in this docket on April 1 and October 1 every year thereafter. The Commission shall review these programs in its biennial review beginning in April 2020.

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

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, pursuant to MCL 462.26. To comply with the Michigan Rules of Court's requirement to notify the Commission of an appeal, appellants shall send required notices to both the Commission's Executive Secretary and to the Commission's Legal Counsel. Electronic notifications should be sent to the Executive Secretary at mpscedockets@michigan.gov and to the Michigan Department of the Attorney General - Public Service Division at pungp1@michigan.gov. In lieu of electronic submissions, paper copies of such notifications may be sent to the Executive Secretary and the Attorney General - Public Service Division at 7109 W. Saginaw Hwy., Lansing, MI 48917.

MICHIGAN PUBLIC SERVICE COMMISSION

Sally A. Talberg, Chairman

Norman J. Saari, Commissioner

By its action of February 21, 2019.

Kavita Kale, Executive Secretary

M.P.S.C. No. 1 - Electric
DTE Electric Company
(Update of Rider 17)

______ Revised Sheet No. D-110.00
Cancels ____________ Sheet No. D-110.00

STANDARD CONTRACT RIDER NO. 17 **VOLUNTARY RENEWABLE ENERGY ~~PILOT~~**

AVAILABILITY OF SERVICE:

This ~~pilot~~ rider (Rider) is available on an optional basis to full service customers who desire to have a greater portion of their electric use attributed to renewable resources. Customers electing this Rider shall choose the percentage of their electric usage, in 5% increments, to be attributed to renewable resources, at a level beyond the renewable energy all customers receive from the Company's generation fleet. ***Therefore, the minimum subscription amount is the current amount provided through the renewable portfolio standard plus 5%.*** Participation on this Rider is limited such that up to 100% of a customer's usage can be attributed to renewable resources.

Renewable energy available under this Rider will be sourced from Company's solar and wind renewable resources approved in its Renewable Energy Plan (REP) by the Commission's Order in Case No. U-17793 issued December 11, 2015 ("the Company Renewable Resources"). ***Customers will be have the option to subscribe to the blended wind and solar assets or a wind-only program, based on availability. Additional renewable energy assets will be added to the program as forecasted capacity nears the total generation of the assets in the program.***

Service under this Rider shall begin on April 3, 2017. ***Eligible customers will be enrolled on a first come first served basis.*** ~~.~~ ***Therefore, if demand ever exceeds capacity, customers will be placed on a waitlist will have the opportunity to subscribe to the next available assets.*** ~~Customers may enroll in this Rider until the sooner of (i) December 31, 2019 or (ii) until the annual aggregate program cap of 150,000 MWh is reached. Eligible customers will be enrolled on a first come first served basis. Residential customers shall be allowed to make up no more than 33% of the MWh aggregate program cap, and non-residential customers shall be allowed to make up no more than 67% of the MWh aggregate program cap, until December 31, 2017. After December 31, 2017, if the MWh aggregate program cap has not been reached, the remaining available MWh shall be available to any full service customer.~~ This Rider will expire on December 31, 2041.

Renewable Energy Credits (RECs) resulting from the generation of the energy purchased through this Rider shall be retired by the Company on the participants' behalf. These RECs will not be used by the Company to comply with Public Act 295 of 2008 ***(as amended by Public Act 342 of 2016),*** ~~the Michigan Clean, Renewable, and Efficient Energy Act,~~ or similar act or law.

CONTRACT TERM:

A customer may discontinue taking service under this rider at any time~~, however, if a customer terminates service under this rider within 12 months of beginning service under this rider, the customer shall be subject to an early termination fee of $50~~. A participating customer receiving service pursuant to this Rider that later elects to increase the percentage of renewable energy received ***can increase at their current subscription fee, subject to availability***~~, must reapply subject to the program size and enrollment period limitations described above~~. ***If the current phase is sold out, customer can increase their subscription percentage at the modified rate, subject to availability.*** A customer who elects to discontinue service under this rider and subsequently wishes to reenroll, must reapply as a new customer subject to the program ~~size~~***availablity*** ~~and enrollment period limitations described above~~.

(Continued on Sheet D-111.00)

Issued ____________,2019
D. M. Stanczak
Vice President
Regulatory Affairs

Detroit, Michigan

Effective for service rendered on and after ___________,2019

Issued under authority of the
Michigan Public Service Commission
dated __________, 2019
in Case No. U-18352

(Continued from Sheet D-110.00)

STANDARD CONTRACT RIDER NO. 17 (Contd.) **VOLUNTARY RENEWABLE ENERGY ~~PILOT~~**

RATE PER MONTH:

Customers taking service under this Rider shall be subject to the Power Supply and Delivery charges pursuant to their current Rate Schedule, including all applicable surcharges and credits contained in Sections C8.5 and C9.8, for all electric service provided by the Company, including energy purchased under this Rider.

In addition, customers taking service under this Rider will be subject to the Voluntary Renewable Energy ~~Pilot~~ subscription charge for the energy the customer agrees to purchase pursuant to this Rider. The subscription charge is a per kWh charge which recovers all costs associated with the renewable energy being provided pursuant to this rider and program management costs. ~~The subscription charge is $0.072 per kWh.~~ ***The subscription charge will be a flat fee, based on the levelized cost of service of the designated renewable energy facilities approved within the Program, plus a nominal marketing and administrative fee of $0.002/kWh. The initial subscription charge for the blended wind and solar program is $0.072 per kWh based on the orginally approved assets in the program. The initial subscription charge for the blended wind-only program is $0.052 per kWh based on the orginally approved wind asset in the program.***

Upon mutual agreement between the Company and an eligible customer whom is a governmental or educational institution (School, College, University) customer, a one-time upfront subscription charge instead of the per kWh subscription charge described above, may be applied. School shall mean buildings, facilities, playing fields, or property directly or indirectly used for school purposes for children in grades kindergarten through twelve, when provided by a public, or nonpublic school. School does not include instruction provided in a private residence or proprietary trade, vocational training, or occupational school. "College" or "University" shall mean buildings owned by the same customer which are located on the same campus and which constitute an integral part of such college or university facilities. Any such upfront subscription charge is not a customer deposit described in the billing practices applicable to non-residential electric customers (R 460.1607).

All customers taking service under this Rider will also receive a Subscription Credit on a per kWh basis for the energy the customer agrees to purchase pursuant to this Rider. The Subscription Credit shall be equal to the Company's Fuel and Purchase Power (FPP) expense per kWh (including PSCR) collectively known as Unit Cost of Power Supply (UCPS), minus the cost of transmission included in the FPP factor, plus a credit for capacity. The credit for capacity shall be equal to the product of the Zonal Resource Credits for the renewable resources used for this program, as determined by the Mid-Continent Independent System Operator (MISO), and 75% of the applicable MISO published Cost of New Entry for the Company's resource zone. The Subscription Credit components shall be updated annually~~, or any time the Company implements a change to its PSCR factor~~.

(Continued on Sheet D-112.00)

(Continued from Sheet D-111.00)

STANDARD CONTRACT RIDER NO. 17 (Contd.) **VOLUNTARY RENEWABLE ENERGY ~~PILOT~~**

SPECIAL PROVISIONS AND CONDITIONS:

1. Company shall have no obligation to supply electricity under this Rider from the Company Renewable Resources during planned or forced outages of the Company Renewable Resources and may suspend or terminate this Rider and its obligations hereunder, or source the energy for this program from other renewable resources approved in the Company's REP, at the Company's sole discretion, upon an event of force majeure affecting the Company Renewable Resources, which shall include but not be limited to fire, flood, storm, other natural disaster, national emergency or war. If the total energy to be purchased by customers pursuant to this Rider is more than the energy actually produced by Company Renewable Resources for reasons other than those described above, the Company shall source the incremental energy needed for this program from other renewable resources approved in the Company's REP.
2. All revenue collected or payments made by the Company pursuant to this Rider will be reconciled through the company's Renewable Energy Plan Surcharge (REPS) and PSCR surcharge as set forth in the Company's Application in Case No. U-18076. Company may suspend or terminate this Rider and its obligations hereunder in the event of a change of law or regulation that, in Company's sole judgment, materially affects the cost of providing service under this Rider or reduces or limits the revenue collected pursuant to this Rider.

~~2.~~3. ***Pursuant to MCL 460.1061(a), a customer that receives at least 50% of the customer's average monthly electricity consumption through the program is exempt from paying surcharges for incremental cost of compliance. A customer that will not receive at least 50% of the customer's average monthly electricity consumption through the program will be notified that the customer will be responsible for the full applicable charges for the incremental costs of compliance.***

LATE PAYMENT CHARGE:

See Section C4.8.

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

STATE OF MICHIGAN)

Case No. U-18352

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on February 21, 2019 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 J. Brown

Brianna Brown

Subscribed and sworn to before me
this 21st day of February 2019.

Angela P. Sanderson

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

Service List for Case: U-18352

Name	Email Address
Amit T. Singh	singha9@michigan.gov
Andrea E. Hayden	haydena@dteenergy.com
Christopher M. Bzdok	chris@envlaw.com
DTE Energy Company	mpscfilings@dteenergy.com
Laura A. Chappelle	lachappelle@varnumlaw.com
Lydia Barbash-Riley	lydia@envlaw.com
Margrethe Kearney	mkearney@elpc.org
Martin Snider	sniderm@michigan.gov
Timothy J. Lundgren	tjlundgren@varnumlaw.com
Toni L. Newell	tlnewell@varnumlaw.com

GEMOTION DISTRIBUTION SERVICE LIST

kadarkwa@itctransco.com	ITC
tjlundgren@varnumlaw.com	Energy Michigan
lachappelle@varnumlaw.com	Energy Michigan
ddasho@cloverland.com	Cloverland
bmalaski@cloverland.com	Cloverland
vobmgr@UP.NET	Village of Baraga
braukerL@MICHIGAN.GOV	Linda Brauker
info@VILLAGEOFCLINTON.ORG	Village of Clinton
jgraham@HOMEWORKS.ORG	Tri-County Electric Co-Op
mkappler@HOMEWORKS.ORG	Tri-County Electric Co-Op
psimmer@HOMEWORKS.ORG	Tri-County Electric Co-Op
frucheyb@DTEENERGY.COM	Citizens Gas Fuel Company
mpscfilings@CMSENERGY.COM	Consumers Energy Company
jim.vansickle@SEMCOENERGY.COM	SEMCO Energy Gas Company
kay8643990@YAHOO.COM	Superior Energy Company
christine.kane@we-energies.com	WEC Energy Group
jlarsen@uppco.com	Upper Peninsula Power Company
dave.allen@TEAMMIDWEST.COM	Midwest Energy Coop
bob.hance@teammidwest.com	Midwest Energy Coop
tharrell@ALGERDELTA.COM	Alger Delta Cooperative
tonya@CECELEC.COM	Cherryland Electric Cooperative
bscott@GLENERGY.COM	Great Lakes Energy Cooperative
sculver@glenergy.com	Great Lakes Energy Cooperative
kmarklein@STEPHENSON-MI.COM	Stephson Utilities Department
debbie@ONTOREA.COM	Ontonagon County Rural Elec
ddemaestri@PIEG.COM	Presque Isle Electric & Gas Cooperative, INC
dbraun@TECMI.COOP	Thumb Electric
rbishop@BISHOPENERGY.COM	Bishop Energy
mkuchera@AEPENERGY.COM	AEP Energy
todd.mortimer@CMSENERGY.COM	CMS Energy
jkeegan@justenergy.com	Just Energy Solutions
david.fein@CONSTELLATION.COM	Constellation Energy
kate.stanley@CONSTELLATION.COM	Constellation Energy
kate.fleche@CONSTELLATION.COM	Constellation New Energy
mpscfilings@DTEENERGY.COM	DTE Energy
bgorman@FIRSTENERGYCORP.COM	First Energy
rarchiba@FOSTEROIL.COM	My Choice Energy
greg.bass@calpinesolutions.com	Calpine Energy Solutions
rabaey@SES4ENERGY.COM	Santana Energy
cborr@WPSCI.COM	Spartan Renewable Energy, Inc. (Wolverine Power Marketing Corp)
cityelectric@ESCANABA.ORG	City of Escanaba
crystalfallsmgr@HOTMAIL.COM	City of Crystal Falls
felicel@MICHIGAN.GOV	Lisa Felice
mmann@USGANDE.COM	Michigan Gas & Electric
mpolega@GLADSTONEMI.COM	City of Gladstone
rlferguson@INTEGRYSGROUP.COM	Integrys Group

GEMOTION DISTRIBUTION SERVICE LIST

lrgustafson@CMSENERGY.COM	Lisa Gustafson
daustin@IGSENERGY.COM	Interstate Gas Supply Inc
krichel@DLIB.INFO	Thomas Krichel
cityelectric@BAYCITYMI.ORG	Bay City Electric Light & Power
Stephen.serkaian@lbwl.com	Lansing Board of Water and Light
George.stojic@lbwl.com	Lansing Board of Water and Light
jreynolds@MBLP.ORG	Marquette Board of Light & Power
bschlansker@PREMIERENERGYLLC.COM	Premier Energy Marketing LLC
ttarkiewicz@CITYOFMARSHALL.COM	City of Marshall
d.motley@COMCAST.NET	Doug Motley
mpauley@GRANGERNET.COM	Marc Pauley
ElectricDept@PORTLAND-MICHIGAN.ORG	City of Portland
gdg@alpenapower.com	Alpena Power
dbodine@LIBERTYPOWERCORP.COM	Liberty Power
leew@WVPA.COM	Wabash Valley Power
kmolitor@WPSCI.COM	Wolverine Power
ham557@GMAIL.COM	Lowell S.
BusinessOffice@REALGY.COM	Realgy Energy Services
landerson@VEENERGY.COM	Volunteer Energy Services
cmcarthur@HILLSDALEBPU.COM	Hillsdale Board of Public Utilities
mrzwiers@INTEGRYSGROUP.COM	Michigan Gas Utilities/Upper Penn Power/Wisconsin
djtyler@MICHIGANGASUTILITIES.COM	Michigan Gas Utilities/Qwest
Teresa.ringenbach@directenergy.com	Direct Energy
christina.crable@directenergy.com	Direct Energy
angela.schorr@directenergy.com	Direct Energy
ryan.harwell@directenergy.com	Direct Energy
johnbistranin@realgy.com	Realgy Corp.
jweeks@mpower.org	Jim Weeks
mgobrien@aep.com	Indiana Michigan Power Company
mvorabouth@ses4energy.com	Santana Energy
sjwestmoreland@voyager.net	MEGA
hnester@itctransco.com	ITC Holdings
lpage@dickinsonwright.com	Dickinson Wright
Deborah.e.erwin@xcelenergy.com	Xcel Energy
mmpeck@fischerfranklin.com	Matthew Peck
CANDACE.GONZALES@cmsenergy.com	Consumers Energy
JHDillavou@midamericanenergyservices.com	MidAmerican Energy Services, LLC
JCAltmayer@midamericanenergyservices.com	MidAmerican Energy Services, LLC
LMLann@midamericanenergyservices.com	MidAmerican Energy Services, LLC
karl.j.hoesly@xcelenergy.com	Northern States Power
kerri.wade@teammidwest.com	Midwest Energy Coop
dixie.teague@teammidwest.com	Midwest Energy Coop
meghan.tarver@teammidwest.com	Midwest Energy Coop
Karen.wienke@cmsenergy.com	Consumers Energy
Michael.torrey@cmsenergy.com	Consumers Energy

GEMOTION DISTRIBUTION SERVICE LIST

croziera@dteenergy.com	DTE Energy
stanczakd@dteenergy.com	DTE Energy
Michelle.Schlosser@xcelenergy.com	Xcel Energy
dburks@glenergy.com	Great Lakes Energy
kabraham@mpower.org	Michigan Public Power Agency