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December 16, 2019

Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 West Saginaw Highway
3rd Floor
Lansing, MI 48917

Re: MPSC Case No. U-20147

Dear Ms. Felice:

Attached please find the Written Comments of International Transmission Company d/b/a *ITCTransmission* and Michigan Electric Transmission Company, LLC for filing in Case No. U-20147.

If there are any questions regarding this filing, please contact the undersigned.

Sincerely,

/s/ Amy C. Monopoli

Amy C. Monopoli

*Counsel for International Transmission
Company d/b/a ITCTransmission and
Michigan Electric Transmission Company,
LLC*

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,)
to open a docket for certain regulated electric)
utilities to file their distribution investment) Case No. U-20147
and maintenance plans and for other related,)
uncontested matters.)
_____)

Comments of International Transmission Company d/b/a ITC*Transmission* and
Michigan Electric Transmission Company, LLC

I. Introduction

On September 11, 2019, the Michigan Public Service Commission ("Commission") issued an Order ("Order") directing Commission Staff to file a report ("Report") in this docket of findings made through its distribution planning stakeholder process. The Order indicated that the Report "shall summarize the stakeholder workgroup process, including discussions conducted on the value of resilience, and shall also provide recommendations for the Commission to include as guidance for the next round of distribution investment and maintenance plans."¹ Commission Staff requested that comments from stakeholders be filed in this docket by December 16, 2019. To that end, International Transmission Company d/b/a ITC*Transmission* ("ITC*Transmission*") and Michigan Electric Transmission Company, LLC ("METC") (collectively, the "ITC Companies" or "ITC") hereby respectfully submit the following comments.

II. Description of the ITC Companies

The ITC Companies are independent, stand-alone transmission companies engaged exclusively in the development, ownership and operation of facilities for the transmission of electric energy in interstate commerce. Each is a subsidiary of ITC Holdings Corp. ITC Holdings Corp. invests exclusively in the electric power transmission grid to improve electric reliability, facilitate access to renewable and other generation, improve access to power markets, and reduce the overall cost of delivered electric power. Transmission service over facilities developed and owned by the ITC Companies is provided by the Midcontinent Independent System Operator, Inc. ("MISO") pursuant to its Open Access Transmission, Energy and Operating Reserves Tariff. The ITC Companies are all Transmission Owner members of MISO.

III. Comments

As evidenced by the distribution plans filed by the utilities in this docket and by the materials discussed at the Commission Staff's Distribution Stakeholder Planning Sessions, the demands on Michigan's electric grid will continue to change at an ever-increasing pace, as new

¹ Order, Ordering Paragraph A.

technologies are adopted and as renewable energy resources comprise a greater percentage of the generation resource mix. Given the rapidly-occurring changes, coordinated planning between all stakeholders is crucial to ensuring the reliability and resiliency of the electric grid going forward, and to ensure productive coordination and collaboration, robust information and data sharing among stakeholders is necessary.

The ITC Companies believe that detailed information regarding the components of the distribution plans should be shared with stakeholders so that stakeholders can provide informed and relevant input into the distribution plans in a timely and efficient manner, and the best solutions for the grid may be developed. Less transparency will result in sub-optimal planning, additional costs for Michigan's ratepayers, and the inefficient use of resources and infrastructure. The sharing of detailed information throughout the distribution planning process will enable utilities and stakeholders to work together to develop modern infrastructure that is resilient, reliable, and able to meet the demands of Michigan's energy future. Simply stated, if the utilities do not share detailed and specific data about their plans during the distribution planning process, stakeholders will not be able to inform the process in any meaningful way.

For example, transmission is a crucial component of the electric grid and will continue to serve a vital role as changes continue to occur on the grid. The ITC Companies are independent, standalone transmission companies in the State. From their vantage point, the ITC Companies have access to some real-time data about the *current* configurations and needs of the utilities' distribution systems and use that data to plan the transmission system to ensure reliability. The ITC Companies do not, however, have access to specific data and information regarding the utilities' *forward-looking* distribution plans. Specific, detailed data and information regarding the utilities' forward-looking distribution plans² should be provided to stakeholders, such as the ITC Companies, during the distribution planning process so that pertinent analyses can be performed and input regarding the plans – based on actual data – can be provided.

IV. Conclusion

The ITC Companies appreciate the opportunity to participate in the Distribution Planning Stakeholder Sessions and provide comments in this docket. The ITC Companies are also pleased that the Commission has initiated several plans of action to facilitate coordination and collaboration, including the MI Power Grid project, and looks forward to participating in these proceedings moving forward. As stated herein, the ITC Companies believe that transparency and the timely communication of information in the distribution planning process are necessary to ensure that the best solutions are developed to meet the needs of Michigan's ever-evolving energy system. Only with robust information sharing will utilities and stakeholders be able to collaborate and coordinate productively during the distribution planning process so that the best solutions are developed for Michigan.

² The information sharing process should also include the sharing of third-party plans known to the utilities, including third-party plans for distributed energy resources, storage, and other non-wires alternatives.

Respectfully submitted,

/s/ Amy Monopoli

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Dated: December 16, 2019