

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

\* \* \* \* \*

In the matter, on the Commission’s own motion, to )  
review its response to the novel coronavirus )  
(COVID-19) pandemic, including the statewide state )  
of emergency, and to provide guidance and direction )  
to energy and telecommunications providers and other )  
stakeholders. )  
\_\_\_\_\_ )

Case No. U-20757

At the February 18, 2021 meeting of the Michigan Public Service Commission in Lansing,  
Michigan.

PRESENT: Hon. Daniel C. Scripps, Chair  
Hon. Tremaine L. Phillips, Commissioner  
Hon. Katherine L. Peretick, Commissioner

**ORDER**

Introduction and Purpose

Michigan continues to face an unprecedented situation with the novel coronavirus (COVID-19) pandemic threatening human health and disrupting the economy. During this tumultuous period in our state’s history, it is of utmost importance to maintain the safety, reliability, and accessibility of critical infrastructure, including energy and telecommunications services under the jurisdiction of the Michigan Public Service Commission (Commission).

During this pandemic, a plethora of issues have surfaced and have been addressed by the Commission and other entities to ensure utilities have the resources, authorizations, and guidance to operate effectively and provide continuity of service. In addition, with abrupt disruptions to households and businesses across the state, and stresses on governmental support systems such

as unemployment and energy assistance programs, the Commission has emphasized the need for special protections for customers to access utility services and to assist those struggling with utility bills. On April 15, 2020, the Commission issued an order in this docket (April 15 order) describing its efforts to date to respond to the COVID-19 pandemic. *See*, April 15 order, pp. 4-8. In addition to summarizing its own actions, the April 15 order directed electric, natural gas, and telecommunications providers under its jurisdiction to complete a number of actions in the following areas: (1) customer protections and affordability, (2) accounting treatment, (3) regulatory activities, (4) energy assistance coordination, (5) energy waste reductions (EWR) and demand response (DR) continuity, and (6) broadband access and expansion efforts.

Specifically, rate-regulated energy utilities were directed to:

1. Consult with Commission Staff (Staff), on or before April 30, 2020, on the energy utility's practices and plans to address challenges and opportunities to improve affordability for customers, including options for payment flexibility, opportunities to support energy assistance programs, and customer education and outreach. This consultation addressed all customer classes, with an emphasis on customers impacted by governmental orders due to COVID-19 response, and those financially or medically impacted by COVID-19. Consultation could be done individually or in groups.
2. Provide advance notification to the Commission prior to filing any new rate case between now and August 1, 2020, and consult with the Staff prior to filing to discuss timing and substantive considerations.
3. File a statement of affirmation in this docket, on or before April 20, 2020, that the following minimum protections are in place for vulnerable customers related to bill payment, disconnection of service, and reconnection of service:
  - a. Protections for Michigan's low-income customers and seniors—suspend disconnections for Michigan's most vulnerable populations, low-income and senior customers, through June 1, 2020, and waive late fees for eligible low-income customers receiving energy assistance.
  - b. Protections for customers medically affected by COVID-19—allow for customers exposed to, quarantined, or infected by COVID-19 to be eligible for an additional 30-day medical hold to suspend a disconnection service. The criteria and eligibility provisions for this medical hold were in addition

to those set forth in Mich Admin Code, R 460.130.

- c. Restoration of electric and gas service—waive deposits and reconnection fees for low-income customers, seniors, and customers experiencing financial hardship related to COVID-19 and seeking restoration of electric or natural gas service.
- d. Offer financial and customer assistance—extend access to and flexibility of payment plans to customers financially impacted by COVID-19 and provide customer assistance personnel with the resources necessary to connect customers to available financial assistance and social service agencies.
- e. Safeguard customers and workforce employees—safeguard customers and utility workers by limiting face-to-face contact through the closing of office lobbies, focusing efforts to provide emergency and critical infrastructure-related activities, and adopting COVID-19 best practices as outlined by the State of Michigan and the Center for Disease Control and Prevention.

April 15 order, pp. 9-10. Similar to rate-regulated utilities, the Commission also directed electric and natural gas cooperatives to respond to the April 15 order to provide affirmation of their shutoff protections. *Id.*, p. 10. The Commission further directed investor-owned utilities (IOUs) to provide a report on residential disconnection notices, shutoffs, and reconnections pursuant to its authority under MCL 460.55, 460.56, 460.556, and 460.556 and the Commission’s billing rules (Mich Admin Code R 460.151). *Id.*, p. 11. The reports were due to the Commission no later than April 30, 2020, and every two weeks thereafter, through June 30, 2020. *Id.*

With respect to energy assistance in the form of bill payment, payment plans, and the Low-Income Heating Assistance Program (LIHEAP), the Staff was also directed to continue to work with the Michigan Department of Health and Human Services (MDHHS), Michigan Energy Assistance Program (MEAP) grantees, utilities, and other partners to support streamlining, opportunities to leverage funding, outreach, and education. *Id.*, pp. 12-13. The Commission also directed the Staff to develop a work plan and to convene electric and natural gas providers with

the goal of ensuring continuity and contingency planning for EWR and DR programs. *Id.*, pp. 18-19.

The April 15 order also sought comment from the public on two topics, one of which being utility accounting issues that may arise from extraordinary costs tied to utilities' response to the pandemic. The Commission stated that it was amenable to utilities tracking certain costs for prudency reviews in response to potential cost recovery requests in the future. *Id.*, p. 14. The Commission also noted the potential for utility savings resulting from lower power supply costs or project deferrals. As such, the Commission sought public comment on the following:

- categories of COVID-19-related extraordinary costs that the Commission should consider authorizing utilities to track (utilities to include actuals to date and projections);
- potential cost savings associated with impacts due to COVID-19 (utilities to include actuals to date and projections);
- potential external sources of revenue that may provide reimbursement for COVID-19-related expenses; and
- options for tracking extraordinary costs, how the cost is calculated, including specific accounting treatment, time periods during which costs should be tracked, and appropriate carrying charges, if any.

*Id.*, pp. 14-15.

The Commission also sought comment on its plan for continuing its regulatory activities, specifically requesting comment on COVID-19 related impacts on the following activities as well as suggestions for addressing these impacts:

- statutory or rule compliance
- tariff compliance
- reporting requirements
- filing deadlines
- pilot projects

- Commission workgroup activities, including MI Power Grid as discussed above.

April 15 order, p. 17.

On July 23, 2020, the Commission issued an order in this docket (July 23 order) listing the energy providers that had provided affirmations of customer protections<sup>1</sup> and the energy providers subject to the Commission's billing rules that had provided reports describing residential shutoffs and reconnection practices in compliance with the April 15 order.<sup>2</sup> The July 23 order also summarized the efforts of each utility to determine which of its customers were disconnected and the progress being made to reconnect service to these customers. July 23 order, pp. 8-13. Further, the July 23 order summarized the comments received in response to the questions posed in the April 15 order and indicated the Commission's next steps. Specifically, the Commission:

- declined to explicitly define what constitutes extraordinary costs and declined to direct utilities to track or defer any specific category of expenses related to their COVID-19 response beyond the Commission's previous authorization for utilities to track and defer uncollectible expenses;
- denied the utilities' request to grant accounting deferrals for additional categories of expenses beyond uncollectible expenses and instead found that the most appropriate path

---

<sup>1</sup> Those energy providers include: Northern States Power Company of Wisconsin (NSP-W), Upper Peninsula Power Company (UPPCo), Consumers Energy Company (Consumers), DTE Gas Company (DTE Gas), DTE Electric Company (DTE Electric), Upper Michigan Energy Resources Corporation (UMERC), Indiana Michigan Power Company (I&M), Alpena Power Company (Alpena), Cloverland Electric Cooperative, Alger Delta Cooperative Electric Association, Cherryland Electric Cooperative, Thumb Electric Cooperative, Great Lakes Energy Cooperative, Presque Isle Electric & Gas Cooperative, Homeworks Tri-County Electric Cooperative, Ontonagon County Rural Electrification Association, Bayfield Electric Cooperative, SEMCO Gas Company (SEMCO), Citizens Gas Fuel Company (Citizens Gas), Michigan Gas Utilities Corporation (MGUC), and Superior Energy Company (Superior Energy).

<sup>2</sup> Those energy providers include: Alpena, Consumers, DTE, I&M, NSP-W, UMERCo, UPPCo, MGUC, and SEMCO. Other energy providers, Citizens Gas, Superior Energy and Lansing Board of Water and Light, that are not rate-regulated by the Commission, also filed timely reports.

moving forward was to address any potential cost recovery issues through an informational filing. Specifically, the Commission instructed any rate-regulated utility that sought special accounting treatment of COVID-19 costs beyond uncollectible expenses, to submit an informational filing no later than November 2, 2020, with updated information and actual dollar amounts for each cost (and forgone revenue) category that the utility seeks to defer, as well as several other financial details and justifications.

- found that March 24, 2020, is the appropriate start date for the tracking and deferral of any COVID-19 related expenses but declined to assign a termination date for tracking and/or deferring COVID-19 related expenses and declined to authorize a carrying charge to be applied to deferred uncollectible expenses, or any other COVID-19 related costs or forgone revenue;
- declined to explicitly direct utilities to adjust power supply cost recovery or gas cost recovery factors;
- declined to direct the rate-regulated utilities to pursue specific avenues of cost savings such as refinancing long-term debt, adjusting generation or dispatch, delaying non-essential operations and maintenance or avoiding capital investment, or canceling contracts, but gave notice that any request for cost recovery of COVID-19 related expenses will be subject to an audit and prudence review that will include examining the company's actions to mitigate costs and take advantage of savings where reasonable to do so. The Commission also declined to direct utilities to track any specific categories of potential savings or to pursue any specific external resources for relief from COVID-19 impacts;
- declined to adopt an expedited waiver and extension proceeding and found the current process to be adequate and declined to modify the definition of "low-income customer" for the purposes of determining eligibility under the traditional EWR low-income programs;
- declined to adopt a two-year achievement period for the EWR targets and financial incentive mechanism or to lower the minimum statutory target by any other means, but stated that the Commission will consider recovery for costs in 2021, that are reasonably and prudently incurred to achieve EWR savings beyond the 1% in the event savings are not achieved in the preceding year;
- directed each rate-regulated utility to file a report no later than October 23, 2020, explaining its efforts to expand EWR programs to low- and moderate-income customers and directed the Staff to produce a report summarizing rate-regulated utilities' EWR efforts and outlining any additional recommendations no later than February 25, 2021;
- declined to take specific action with respect to the rate schedules for schools, universities, and community colleges; declined to relieve demand response customers of future curtailment, interruption, or fees and penalties; and declined to suspend new enrollment in the customer choice cap or alter the requirements for the customer choice program;

- directed the Staff to continue communication and collaboration with energy and telecommunications providers and stakeholders for the purpose of identifying and addressing issues as they arise. Specifically, the Commission directed the Staff to work with energy utilities and other stakeholders on potential improvements to affordable payment plans offered by the utilities and produce a report summarizing the discussions involving affordable payment plans and other assistance, including any recommendations to improve these programs no later than December 15, 2020;
- directed each rate-regulated utility to continue submitting data regarding customer shutoffs, disconnections, and reconnection efforts.

July 23 order, pp. 27-51.

On October 29, 2020, Alpena submitted an informational filing explaining that it had incurred direct costs as a result of the COVID-19 pandemic in the amount of \$10,067.02 in personal protective equipment (PPE), extraordinary cleaning costs, and costs related to off-site remote access for Alpena employees. Alpena requests that the Commission consider these costs for recovery. Alpena's informational filing, p. 2. On November 2, 2020, MGUC, NSP-W, and UMERC filed letters in this docket indicating that the utilities had not incurred COVID-19 expenses beyond uncollectible expenses and that the pandemic is ongoing and, therefore, the utilities reserve the right to defer/recover COVID-19-related expenses in the future.

The Staff filed a response to the utilities' filings on November 23, 2020. The Staff did not take issue with the letters filed by MGUC, NSP-W, and UMERC, but recommended that the Commission deny Alpena's extraordinary cost request. The Staff contends that Alpena's \$10,067.02 in COVID-19 expenses does not represent significant or material costs and is not sufficiently justified. Relying on Alpena's last rate case, Case No. U-18234, the Staff argued that Alpena's requested \$10,067.02 represents approximately 0.2% of the company's \$6 million operations and maintenance projected expense for 2018 and, therefore, the \$10,067.02 in

COVID-19 expenses is not material. The Staff then recites the financial details requested by the Commission in the July 23 order, which included the following:

1. Cost / Forgone Revenue Category
  - a. A narrative explaining: (1) the cost, what is included in it, and why it should be approved for deferral; (2) how the cost is calculated, including any specific accounting treatment; (3) the time period for which the cost category should be tracked; and (4) the appropriate carrying charge, if any;
  - b. Cost included in rates (for each month);
  - c. Actual cost incurred through most recently available data (for each month) or estimated actual cost for remainder of months for 2020 (for each month);
  - d. Tracked Amount, which is calculated as the actual amount less the amount included in rates;
  - e. Estimated ROE [return on equity] if this cost category is approved in full for deferred accounting treatment (and all other cost category requests are denied in full);
  - f. Estimated ROE if this cost category is not approved for deferred accounting treatment (and all other cost category requests denied).
2. Total estimated ROE if all tracked cost categories including uncollectibles are approved for deferred accounting treatment or eventual recovery.
3. Total estimated ROE if all tracked cost categories including uncollectibles are not approved for deferred accounting treatment or eventual recovery.
4. Quarterly financial results for each of the first three quarters, including ROE on a financial basis and a regulatory basis for each quarter.
5. Information on earnings per share (EPS): expected EPS, revised EPS, guidance on dividends, and actual dividends paid.

July 23 order, pp. 30-31. The Staff argues that Alpena omitted the majority of the requested information when explaining its COVID-19-related expenses, and therefore, the Commission cannot perform a complete analysis of the company's revenues, expenses, and earnings. Staff's response, pp. 4-5. Thus, the Staff recommends Alpena's



request for recovery of PPE, extraordinary cleaning costs, and remote expenses be denied. *Id.*, p. 6.

#### The Commission Staff's U-20757 Collaboration and Communication Process

In compliance with the Commission's directive, the Staff continued communication with energy and telecommunications providers as well as stakeholders regarding utility responses to the COVID-19 pandemic and discussed ways to improve energy assistance, affordability, and customer protections going forward. On December 15, 2020, the Staff filed a report (Staff Report) summarizing those discussions with recommendations for the Commission's next steps in its response to the pandemic. *U-20757 Collaboration and Communication Process*, filing #U-20757-0241 in Case No. U-20757. The Staff Report is available in its entirety for public viewing in this docket; thus, this order summarizes only key points of the Staff Report and addresses the Staff's recommendations.

The Staff began its report by outlining the various means of energy assistance and customer protections available via federal, state, and utility programs and policies. Staff Report, pp. 2-12. The Staff then provided an overview of its ongoing collaborations with telecommunications providers, energy providers, and stakeholders that continued for the purpose of understanding concerns related to affordability and finding ways to improve affordable payment plans (APPs). Collaborations with telecommunications providers focused on access, affordability, and adoption with respect to broadband service with the Staff Report highlighting the launch of the Wi-Fi hotspot map in partnership with Connected Nation Michigan; the Michigan Department of Technology, Management and Budget; and the Michigan Department of Education. *Id.*, pp. 12-13. The Staff also summarized its continued collaborations with energy providers and stakeholders. The following highlights the Staff's collaborative efforts:

- The MEAP Workgroup: This workgroup aimed to identify and resolve challenges with energy assistance coordination and formed three ongoing subcommittees (Provision of Deliverable Fuel in Times of Crisis, Supporting Self-Sufficiency and Energy Needs for Vulnerable Populations, and Monitoring and Evaluation) to address specific issues.
- The MDHHS State Emergency Relief (SER)/MEAP Study: The SER/MEAP study sought to understand how the SER and MEAP programs were serving customers, identified a lack of data analysis on the interaction between the two programs as an issue, and, in an effort to remedy the data deficiency, MDHHS contracted with an outside consultant to assess the energy security of program participants.
- Biweekly State/Commission Energy Assistance Meeting: These meetings provided an opportunity to trouble shoot the MEAP and SER programs.
- Ongoing MDHHS/Commission/Utility Low-Income Energy Assistance Call: This call allowed for informal sharing of data on growing arrearages, customer outreach and education, program changes, and anticipation of customer needs once the voluntary shutoff moratorium ended.
- Collaborative Statewide Education and Outreach Campaign: The Staff partnered with other state agencies, utilities, and customer advocacy groups to educate utility customers about customer protections and energy assistance.
- Coalition to Keep Michigan Warm (CTKMW): The CTKMW is a group of energy providers, advocates, non-profit agencies, and state partners who advocate for low-income households and affordable energy services. The Staff participated in monthly meetings to provide Commission updates and information related to MEAP.
- EWR Low-Income Workgroup: The Staff established a collaboration between the Commission Customer Assistance Division and the EWR Low-Income Workgroup to align their similar goals.
- Foundation for Utility Communication and Collaboration: Per the direction of the April 15 order, the Staff engaged with rate-regulated utilities to discuss improving data collection on disconnected households and developing strategies to reconnect customers.
- Biweekly Data on Shutoff and Arrearage Trends: The continued reporting by utilities regarding shutoffs and arrearages allowed the Staff to identify areas where data was lacking and to gain a complete understanding of the number of and reasons for utility disconnections.
- Consultations with Utilities and Stakeholders on Shutoff and Arrearage Data: The Staff worked with utilities to improve upon the data reporting template for shutoff and arrearage data and identified issues with accessibility of the data in the Commission's

E-dockets system.

- **Facilitated Meetings on Setting Priorities:** The Commission’s Customer Assistance Division, with stakeholder participation, held a series of meetings focused on energy assistance and customer protection overviews and obtaining stakeholder input on priorities moving forward.
- **Commission-ordered Collaborations on Percentage of Income Payment Plans (PIPPs):** The Staff and stakeholders are currently in discussions with DTE Electric and Consumers regarding how to structure their respective PIPP pilots.
- **Other Commission Collaborations and Communications:** The Commission Customer Assistance Division conducted a presentation for the Michigan Poverty Law Program covering “Utility Shut Offs, Billing, Arrearages, Complaints, and COVID-19 Guidelines.”
- **DTE Energy Company (DTE) One-time Balance Reduction Initiative:** DTE developed a pilot program to pay down the bills of customers with high arrearages, with which the Staff coordinated with the company to design a process for sharing the pilot funding among DTE shareholders and ratepayers.
- **LIHEAP Direct Support Pilot:** This program, which grew out of discussion between MDHHS, the Staff, and regulated utilities, addressed growing arrearages among current low-income customers due to the voluntary shutoff moratorium and the anticipation of an influx of newly economically stressed customers.
- **DTE and Consumers Gift Programs:** Consumers allocated a \$12 million gift program for energy assistance to be made available to customers not eligible for traditional energy assistance and DTE allocated a \$13 million gift program but made these funds available to customers traditionally eligible for energy assistance. The Staff will review the metrics of each program to assess their impact.
- **Utility Specific Flexible Payment Plans:** During the winter heating season, the Staff continues to communicate with utilities on strategies to keep customers safe and warm while continuing to provide customers with flexible payments options as investor-owned utilities had done following the April 15 order.

Staff Report, pp. 14-28.

As to best practices, the Staff first explained that further research is needed but also recounted its initial review of causes of energy burdens as well as best practices based on participation in webinars with the National Association of Regulatory Utility Commissioners

(NARUC), the National Regulatory Research Institute, and the Low-Income Energy Issues

Forum, as well as other topical studies and materials. Staff Report, pp. 28-32. As a preface to its recommendations, the Staff explained that its report:

encompasses programs [over] which the [Commission] may not have jurisdiction, but that impact programs and processes within the [Commission's] purview and are critical to protecting customers during the pandemic in the short and long term as the economic fallout continues to affect Michigan residents. Staff stresses that continued collaboration among state departments, utilities, and stakeholders is critical to the timely response for issues that arise from the pandemic. This ongoing collaboration also affords the opportunity to take lessons learned from the pandemic response to improve the overall system of assistance and protections in Michigan.

Staff Report, p. 32. The Staff proceeded to make the following recommendations categorized into particular areas of focus to the Commission:

- **Ongoing COVID-19 Response:** The Staff recommends continued informal and formal collaboration to problem solve issues that arise from the pandemic. The Staff recommends that the Commission require utilities to continue to submit monthly data reporting on shutoffs and arrearages for the foreseeable future and that the monthly data in aggregate be made publicly available in a protected, more easily analyzed form. The Staff recommends engaging in intensive collaborative outreach and education, working closely with stakeholders to connect with trusted community partners to inform difficult to reach customers on the availability of energy assistance.
- **Equity and Affordability:** The Staff recommends that equity be considered when reviewing energy assistance programs, customer protections, and policy development in the work of collaboratives.
- **Simplify Energy Assistance and Customer Protection Systems:** The Staff recommends the consideration of a collaborative that works in connection with the EWR Low-Income Workgroup to: (1) study the alignment of income eligibility across energy assistance programs and customer protections, including studying the impacts of expanding eligibility to 200% or under of the federal poverty level (FPL); and, under Commission jurisdiction, align application processes if it is beneficial; (2) analyze the application, eligibility determination, and program design for the various assistance programs and utility-based credits, additionally making recommendations for alignment and simplification; and (3) direct utilities to pilot the targeting of communications so that recipients of an energy assistance program will be alerted to eligibility for energy efficiency programs.
- **Affordable Energy Bills:** The Staff recommends exploring the adoption of a common definition of energy affordability and energy self-sufficiency with the goal of reducing the number of households in Michigan with unsustainable energy burdens.

- Streamline and Improve APPs: The Staff recommends exploring APPs and assistance options in more depth with the collaborative mentioned above, with the goal of establishing consistent expectations and metrics across programs to better understand efficacy for program improvements and lists possible objectives for inclusion in the collaborative's efforts.
- Importance of Data, Transparency, and Analysis to Inform Program Design and Policy Changes: The Staff recommends exploring a long-term data collection strategy, using the monthly shutoff and arrearage data submissions required under the July 23 order, the quarterly reports required under Mich Admin Code R 460.151, the NARUC Resolution on Best Practices in Data Collection and Reporting for Utility Services Delinquencies in Payments and Disconnections of Service, and the work from various studies and collaboratives as inputs to strategy development. The Staff also recommends that the Commission engage with NARUC to explore the elements of the resolution on best practices and data collection reporting.
- Review of Rule-Based Protections: The Staff recommends studying the efficacy of the Consumer Billing Rules, Part 7 Energy Assistance and Shutoff Protection Programs for Residential Customers, and providing recommendations for improvement.
- Communication and Engagement: The Staff recommends the Commission continue with formal and informal collaborations and establish regular mechanisms for stakeholders to provide input on improving communication and materials, and to broaden its outreach to groups traditionally not a part of utility communications. These groups could include specialized chambers of commerce, faith-based associations and organizations, and senior advocates. Any discussions should include 211.org, the state-wide hub for customers accessing all kinds of assistance.

Staff Report, pp. 32-40.

### Discussion

To begin, the Commission thanks the Staff, energy and telecommunications providers, and other stakeholders for their continued participation in the Commission's development and implementation of its COVID-19 pandemic response. The pandemic has posed tremendous challenges in the energy and telecommunications sectors and the Commission is appreciative of the significant work that has been done to address these challenges in the short-term as well as to find long-term solutions for issues like energy assistance, customer outreach, information and

data gathering and analysis, and coordination and alignment of customer assistance services. As to the Staff Report, the Commission thanks the Staff for its continued work in collaborating with energy and telecommunications providers and stakeholders and for producing a comprehensive report documenting those collaborations, the challenges in the areas of APPs, energy assistance, and customer protections, and providing recommendations for continued work in this area.

The Commission first addresses the informational filings by Alpena, MGUC, NSP-W, and UMER. Similar to the Staff, the Commission does not take issue with the notice provided by MGUC, NSP-W, and UMER regarding their right to seek recovery of COVID-19 related expenses in the future. The Commission reiterates that the purpose of the July 23 directive for the informational filing was for utilities who are experiencing extraordinary costs and seeking recovery beyond uncollectible expenses to present and justify those costs, in order for the Commission to consider whether special accounting treatment or deferral of certain expenses is appropriate beyond the uncollectible expenses previously approved for deferral. *See*, April 15 order, p. 15. The Commission also clarifies that actual recovery of any costs will be addressed in a utility's contested general rate case proceeding and be subject to a reasonableness and prudence review.

Turning to Alpena's informational filing, the Commission finds that the information submitted by Alpena regarding the \$10,067.02 in PPE, cleaning costs, and remote expenses falls short of the level of detailed financial information that the Commission requested in the July 23 order. Apart from the cost itself and a brief narrative explaining the cost, Alpena did not provide any of the additional details requested by the Commission. As such, the Commission does not have a complete picture of the company's financials that would allow it to determine whether these expenses should be considered for special accounting treatment or eventual recovery.

Therefore, the Commission finds that Alpena's request for consideration of recovery for \$10,067.02 in COVID-19-related expenses should be denied.

The Commission now addresses the recommendations made by the Staff in the Staff Report. As an initial matter, the Commission agrees with the Staff that the work to respond to the COVID-19 pandemic and to address energy affordability and customer protections is ongoing and will require future collaboration between the Commission and federal and state agencies as well as energy and telecommunications providers and stakeholders. As such, the Commission adopts the Staff's recommendation in the Ongoing COVID-19 Response category to form the Energy Affordability and Accessibility Collaborative (EAA Collaborative) and directs the Staff to convene the collaborative for the purposes of addressing recommendations set forth in the Staff Report, as described in this order.

However, given the subject matter of energy assistance and affordability addressed in the Staff Report, the Commission notes that there is overlap between the issues to be covered in the EAA Collaborative and the EWR Low-Income Workgroup and thus there may be interest from the participants in the EWR Low-Income Workgroup in participating in the EAA Collaborative. Therefore, in the interests of not overtaxing the time and resources of participants by requiring participation in two separate collaboratives, the Commission directs the Staff to explore via discussions with the EWR Low-Income Workgroup how best to coordinate with the EAA Collaborative. The Commission further directs the Staff and the EWR Low-Income Workgroup to consider and explore the option of including the EAA Collaborative within the EWR Low-Income Workgroup. Given the Staff's expertise and leading role in the EWR Low-Income Workgroup, the Commission finds that the Staff is in the best position to determine how to coordinate the two efforts and will, therefore, defer to the Staff's determination.

The Commission also observes that some of the recommendations made in the Staff Report are well suited to be addressed in the existing MI Power Grid Customer Education and Participation Workgroup, which is a workgroup aimed, in part, at facilitating broader communication and engagement with customers.<sup>3</sup> As noted below, with this order, the Commission is designating the recommendations that should be addressed in each collaborative or workgroup, whether it be the EAA Collaborative, the EWR Low-Income Workgroup, or the MI Power Grid Customer Education and Participation Workgroup. For those recommendations assigned to the EAA Collaborative specifically, the Commission also grants the Staff latitude in addressing these issues in coordination with the EWR Low-Income Workgroup.

Further, the Commission anticipates that the work done in the EAA Collaborative will continue through 2021, carrying over into 2022, and possibly beyond. Given this extended timeline, the Commission directs the Staff to file no later than December 17, 2021 an interim status report in this docket, Case No. U-20757, regarding the progress made in the EAA Collaborative.

Regarding the Staff's other recommendations for the Commission's continued COVID-19 response, the Commission adopts the Staff's recommendation for ongoing data collection. Therefore, for the time being, the Commission directs IOUs to continue to file monthly reports in this docket using the updated Staff template detailing the data on disconnected service to

---

<sup>3</sup> The purpose of the MI Power Grid Customer Education and Participation Workgroup recognizes that, "in order to maximize the value of clean and distributed energy resources for customers, significant attention needs to be given to educating and facilitating customer participation and access to new demand-side technologies, energy waste reduction programs, demand response offerings, time-based pricing and other related programs." *Customer Education and Participation*, [https://www.michigan.gov/mpsc/0,9535,7-395-93307\\_93312\\_93593\\_95590\\_95594\\_95685-508655--,00.html](https://www.michigan.gov/mpsc/0,9535,7-395-93307_93312_93593_95590_95594_95685-508655--,00.html) (last visited February 18, 2021).



occupied and unoccupied residences and arrearages. While the information in these reports is available to the public via the Commission's E-dockets system, the Commission adopts the Staff's recommendation to make this data publicly available in a protected, more easily analyzable form. The Commission also adopts the Staff's outreach and education recommendation to work with stakeholders to improve the dissemination of energy assistance information to difficult to reach customers. The Commission finds that this recommendation should also be addressed by the EAA Collaborative. As to the Staff's recommendation regarding equity, the Commission agrees that equity should be considered when reviewing energy assistance programs, customer protections, and policy development, and finds that equity considerations should be specifically addressed in the MI Power Grid Customer Education and Participation Workgroup as well as in the EAA Collaborative.

For the Simplify Energy Assistance and Customer Protection Systems category, the Staff recommended that the Commission convene a collaborative in coordination with the EWR Low-Income Workgroup to accomplish the following three tasks:

1. Study the alignment of income eligibility across energy assistance programs and customer protections, including studying the impacts of expanding eligibility to 200% of the FPL; and under Commission jurisdiction, align application processes if it is beneficial; and
2. Analyze the application, eligibility determination, and program design for the various assistance programs and utility-based credits, additionally making recommendations for alignment and simplification.
3. Direct utilities to pilot the targeting of communications so that recipients of an energy assistance program will be alerted to eligibility for energy efficiency programs.

The Commission agrees with the Staff's recommendation and directs the Staff to address these tasks in the EAA Collaborative in close coordination with the EWR Low-Income Workgroup.

As the Commission discussed previously, the Commission defers to the Staff in the EWR Low-Income Workgroup to determine how best to coordinate with the EAA Collaborative.

As to the Staff's recommendation for the Affordable Energy Bills category, the Commission adopts the recommendation and assigns the task of adopting a common definition of energy affordability and energy self-sufficiency to the EAA Collaborative. The Commission directs the Staff to include in the interim status report, an update as to the collaborative's progress on developing these definitions. The Commission also finds the list of considerations accompanying the Staff's recommendation for a common definition of energy affordability and energy self-sufficiency to be reasonable and directs the collaborative to consider these points along with any other relevant considerations. Staff Report, p. 37. The Commission also finds that the EAA Collaborative is the appropriate venue to address the Staff's recommendation to streamline and improve APPs. Therefore, the Commission directs the EAA Collaborative to address this recommendation with consideration of the objectives set forth on pages 37-38 of the Staff Report and to work with the EWR Low-Income Workgroup on this issue.

In the Staff Report, the Staff explains the importance of data collection and analysis to responding to issues arising from the pandemic but also to long-term program design and refinement. The Staff goes on to explain that as utilities submitted their shutoff and arrearage data in compliance with the April 15 order, the Staff found that exploring a long-term data collection strategy that captured specific demographic information and energy burdens of customers would prove beneficial. The Commission agrees that an examination of a long-term data collection strategy is worthwhile, and therefore, adopts the Staff's recommendation, including the recommendation to engage with NARUC, and directs the EAA Collaborative to take on this initiative in coordination with ongoing data collection that the Commission has

directed utilities to continue with this order. As mentioned previously with respect to the EAA Collaborative's work, the development of an improved data collection strategy is expected to continue through 2022. Therefore, the Staff shall include an update on its progress regarding data collection in the interim report to be filed no later than December 17, 2021.

The Commission further directs the Staff, in its efforts to add demographic information into the shutoff and arrearage data, to consider recommendations from the Commission's Diversity, Equity, and Inclusion (DEI) initiative. The DEI initiative is an internal Commission committee made up of Commissioners and Staff that have been tasked with comprehensively examining Commission practices and identifying opportunities to promote DEI in a fundamental, meaningful manner. Areas of focus include development of an official DEI policy statement, review of existing hiring and advancement practices, consideration of DEI context in regulatory strategies, and promoting education and awareness about DEI through internal learning opportunities and public outreach. This comprehensive effort by the DEI initiative is intended to impact every area of the Commission's work and would be particularly helpful in the Staff's long-term data collection strategy that will involve looking at race, gender, income, and zip code information in gathering demographic information.

With respect to the Staff's recommendations in the Review of Rule-Based Protections category, the Commission agrees that review of the efficacy of Part 7 of the Commission's billing rules, Mich Admin Code R 460.128 *et seq.*, would be beneficial and finds that this review is related to the long-term data collection strategy and should also be addressed by the EAA Collaboration.

In the last category, the Staff recommends that the Commission continue with the formal and informal collaborations that it has undertaken in its COVID-19 response. The Commission

agrees that these collaborations have been highly valuable in the Commission’s response to the pandemic, and as discussed previously, the Commission’s work to address the challenges posed by the pandemic are ongoing. As such, the Commission adopts the Staff’s recommendation to “continue with formal and informal collaborations and establish regular mechanisms for stakeholders to provide input on improving communication and materials, and to broaden its outreach to groups traditionally not a part of utility communications.” Staff Report, p. 40. Given the range of topics that the Staff’s recommendation encompasses, the Commission finds that the EAA Collaborative shall address this recommendation and focus specifically on communication and engagement related to energy assistance in coordination with the existing MI Power Grid Customer Education and Participation Workgroup. The EAA Collaborative shall also take into consideration any broader recommendations that the Customer Education and Participation Workgroup may have.

THEREFORE, IT IS ORDERED that:

A. The Commission Staff shall convene the Energy Affordability and Accessibility Collaborative in coordination with the Energy Waste Reduction and Low-Income Workgroup to address the Commission Staff’s recommendations in the *U-20757 Collaboration and Communication Process* report regarding the Commission’s ongoing COVID-19 response; affordable payment plans; affordable energy bills; data collection, transparency, and analysis; review of rule-based protections; and communication and engagement, as described in this order. The Commission Staff shall file an interim report in this docket on the progress made and any recommendations no later than December 17, 2021.

B. The Commission directs the MI Power Grid Customer Education and Participation Workgroup to coordinate with the Energy Affordability and Accessibility Collaborative to

address the Commission Staff's recommendations in the *U-20757 Collaboration and Communication Process* report regarding outreach and education for the Commission's ongoing COVID-19 response, including energy assistance, as described in this order.

C. Investor-owned utilities shall continue to file monthly reports in this docket using the updated Commission Staff template detailing the data on disconnected service to occupied and unoccupied residences and arrearages.

D. The request filed by Alpena Power Company on October 29, 2020, for consideration of recovery for COVID-19-related expenses in the amount of \$10,067.02 is denied.

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, under 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](mailto:mpscedockets@michigan.gov) and to the Michigan Department of the Attorney General - Public Service Division at [pungpl@michigan.gov](mailto:pungpl@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

---

Daniel C. Scripps, Chair

---

Tremaine L. Phillips, Commissioner

---

Katherine L. Peretick, Commissioner

By its action of February 18, 2021.

---

Lisa Felice, Executive Secretary

# PROOF OF SERVICE

STATE OF MICHIGAN )

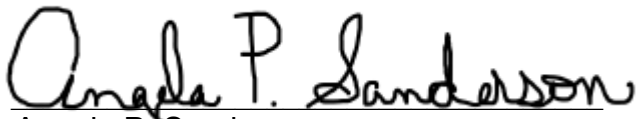
Case No. U-20757

County of Ingham )

Brianna Brown being duly sworn, deposes and says that on February 18, 2021 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 18<sup>th</sup> day of February 2021.



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

**Service List for Case: U-20757**

---

<b>Name</b>	<b>Email Address</b>
Benjamin J. Holwerda	holwerdab@michigan.gov
Haran C. Rashes	hrashes@extenetsystems.com
Heather M.S. Durian	durianh@michigan.gov
Mark R. Ortlieb	mo2753@att.com
Nicholas Q. Taylor	taylorn10@michigan.gov



## GEMOTION DISTRIBUTION SERVICE LIST

<a href="mailto:kadarkwa@itctransco.com">kadarkwa@itctransco.com</a>	ITC
<a href="mailto:tjlundgren@varnumlaw.com">tjlundgren@varnumlaw.com</a>	Energy Michigan
<a href="mailto:lachappelle@varnumlaw.com">lachappelle@varnumlaw.com</a>	Energy Michigan
<a href="mailto:awallin@cloverland.com">awallin@cloverland.com</a>	Cloverland
<a href="mailto:bmalaski@cloverland.com">bmalaski@cloverland.com</a>	Cloverland
<a href="mailto:mheise@cloverland.com">mheise@cloverland.com</a>	Cloverland
<a href="mailto:vobmgr@UP.NET">vobmgr@UP.NET</a>	Village of Baraga
<a href="mailto:braukerL@MICHIGAN.GOV">braukerL@MICHIGAN.GOV</a>	Linda Brauker
<a href="mailto:info@VILLAGEOFCLINTON.ORG">info@VILLAGEOFCLINTON.ORG</a>	Village of Clinton
<a href="mailto:jgraham@HOMEWORKS.ORG">jgraham@HOMEWORKS.ORG</a>	Tri-County Electric Co-Op
<a href="mailto:mkappler@HOMEWORKS.ORG">mkappler@HOMEWORKS.ORG</a>	Tri-County Electric Co-Op
<a href="mailto:psimmer@HOMEWORKS.ORG">psimmer@HOMEWORKS.ORG</a>	Tri-County Electric Co-Op
<a href="mailto:frucheyb@DTEENERGY.COM">frucheyb@DTEENERGY.COM</a>	Citizens Gas Fuel Company
<a href="mailto:mpscfilings@CMSENERGY.COM">mpscfilings@CMSENERGY.COM</a>	Consumers Energy Company
<a href="mailto:jim.vansickle@SEMCOENERGY.COM">jim.vansickle@SEMCOENERGY.COM</a>	SEMCO Energy Gas Company
<a href="mailto:kay8643990@YAHOO.COM">kay8643990@YAHOO.COM</a>	Superior Energy Company
<a href="mailto:vickie.nugent@wecenergygroup.com">vickie.nugent@wecenergygroup.com</a>	Upper Michigan Energy Resources Corporation
<a href="mailto:jlarsen@uppcocom">jlarsen@uppcocom</a>	Upper Peninsula Power Company
<a href="mailto:estocking@uppcocom">estocking@uppcocom</a>	Upper Peninsula Power Company
<a href="mailto:dave.allen@TEAMMIDWEST.COM">dave.allen@TEAMMIDWEST.COM</a>	Midwest Energy Coop
<a href="mailto:bob.hance@teammidwest.com">bob.hance@teammidwest.com</a>	Midwest Energy Coop
<a href="mailto:tharrell@ALGERDELTA.COM">tharrell@ALGERDELTA.COM</a>	Alger Delta Cooperative
<a href="mailto:tonya@CECELEC.COM">tonya@CECELEC.COM</a>	Cherryland Electric Cooperative
<a href="mailto:bscott@GLEENERGY.COM">bscott@GLEENERGY.COM</a>	Great Lakes Energy Cooperative
<a href="mailto:sculver@glenergy.com">sculver@glenergy.com</a>	Great Lakes Energy Cooperative
<a href="mailto:kmarklein@STEPHENSON-MI.COM">kmarklein@STEPHENSON-MI.COM</a>	Stephenson Utilities Department
<a href="mailto:debbie@ONTOREA.COM">debbie@ONTOREA.COM</a>	Ontonagon County Rural Elec
<a href="mailto:ddemaestri@PIEG.COM">ddemaestri@PIEG.COM</a>	Presque Isle Electric & Gas Cooperative, INC
<a href="mailto:dbraun@TECMI.COOP">dbraun@TECMI.COOP</a>	Thumb Electric
<a href="mailto:rbishop@BISHOPENERGY.COM">rbishop@BISHOPENERGY.COM</a>	Bishop Energy
<a href="mailto:mkuchera@AEPENERGY.COM">mkuchera@AEPENERGY.COM</a>	AEP Energy
<a href="mailto:todd.mortimer@CMSENERGY.COM">todd.mortimer@CMSENERGY.COM</a>	CMS Energy
<a href="mailto:igoodman@commerceenergy.com">igoodman@commerceenergy.com</a>	Just Energy Solutions
<a href="mailto:david.fein@CONSTELLATION.COM">david.fein@CONSTELLATION.COM</a>	Constellation Energy
<a href="mailto:kate.stanley@CONSTELLATION.COM">kate.stanley@CONSTELLATION.COM</a>	Constellation Energy
<a href="mailto:kate.fleche@CONSTELLATION.COM">kate.fleche@CONSTELLATION.COM</a>	Constellation New Energy
<a href="mailto:mpscfilings@DTEENERGY.COM">mpscfilings@DTEENERGY.COM</a>	DTE Energy
<a href="mailto:bgorman@FIRSTENERGYCORP.COM">bgorman@FIRSTENERGYCORP.COM</a>	First Energy
<a href="mailto:rarchiba@FOSTEROIL.COM">rarchiba@FOSTEROIL.COM</a>	My Choice Energy
<a href="mailto:greg.bass@calpinesolutions.com">greg.bass@calpinesolutions.com</a>	Calpine Energy Solutions
<a href="mailto:rabaey@SES4ENERGY.COM">rabaey@SES4ENERGY.COM</a>	Santana Energy
<a href="mailto:cborr@WPSCI.COM">cborr@WPSCI.COM</a>	Spartan Renewable Energy, Inc. (Wolverine Power Marketing Corp)
<a href="mailto:gpirkola@escanaba.org">gpirkola@escanaba.org</a>	City of Escanaba
<a href="mailto:crystalfallsmgr@HOTMAIL.COM">crystalfallsmgr@HOTMAIL.COM</a>	City of Crystal Falls
<a href="mailto:felicel@MICHIGAN.GOV">felicel@MICHIGAN.GOV</a>	Lisa Felice
<a href="mailto:mmann@USGANDE.COM">mmann@USGANDE.COM</a>	Michigan Gas & Electric
<a href="mailto:mpolega@GLADSTONEMI.COM">mpolega@GLADSTONEMI.COM</a>	City of Gladstone
<a href="mailto:dan@megautilities.org">dan@megautilities.org</a>	Integrays Group

## GEMOTION DISTRIBUTION SERVICE LIST

<a href="mailto:lrgustafson@CMSENERGY.COM">lrgustafson@CMSENERGY.COM</a>	Lisa Gustafson
<a href="mailto:daustin@IGSENERGY.COM">daustin@IGSENERGY.COM</a>	Interstate Gas Supply Inc
<a href="mailto:krichel@DLIB.INFO">krichel@DLIB.INFO</a>	Thomas Krichel
<a href="mailto:cityelectric@BAYCITYMI.ORG">cityelectric@BAYCITYMI.ORG</a>	Bay City Electric Light & Power
<a href="mailto:jreynolds@MBLP.ORG">jreynolds@MBLP.ORG</a>	Marquette Board of Light & Power
<a href="mailto:bschlansker@PREMIERENERGYLLC.COM">bschlansker@PREMIERENERGYLLC.COM</a>	Premier Energy Marketing LLC
<a href="mailto:ttarkiewicz@CITYOFMARSHALL.COM">ttarkiewicz@CITYOFMARSHALL.COM</a>	City of Marshall
<a href="mailto:d.motley@COMCAST.NET">d.motley@COMCAST.NET</a>	Doug Motley
<a href="mailto:mpauley@GRANGERNET.COM">mpauley@GRANGERNET.COM</a>	Marc Pauley
<a href="mailto:ElectricDept@PORTLAND-MICHIGAN.ORG">ElectricDept@PORTLAND-MICHIGAN.ORG</a>	City of Portland
<a href="mailto:gdg@alpenapower.com">gdg@alpenapower.com</a>	Alpena Power
<a href="mailto:dbodine@LIBERTYPOWERCORP.COM">dbodine@LIBERTYPOWERCORP.COM</a>	Liberty Power
<a href="mailto:leew@WVPA.COM">leew@WVPA.COM</a>	Wabash Valley Power
<a href="mailto:kmolitor@WPSCI.COM">kmolitor@WPSCI.COM</a>	Wolverine Power
<a href="mailto:ham557@GMAIL.COM">ham557@GMAIL.COM</a>	Lowell S.
<a href="mailto:BusinessOffice@REALGY.COM">BusinessOffice@REALGY.COM</a>	Realgy Energy Services
<a href="mailto:landerson@VEENERGY.COM">landerson@VEENERGY.COM</a>	Volunteer Energy Services
<a href="mailto:cmcarthur@HILLSDALEBPU.COM">cmcarthur@HILLSDALEBPU.COM</a>	Hillsdale Board of Public Utilities
<a href="mailto:mrzwiwers@INTEGRYSGROUP.COM">mrzwiwers@INTEGRYSGROUP.COM</a>	Michigan Gas Utilities/Upper Penn Power/Wisconsin
<a href="mailto:Teresa.ringenbach@directenergy.com">Teresa.ringenbach@directenergy.com</a>	Direct Energy
<a href="mailto:christina.crable@directenergy.com">christina.crable@directenergy.com</a>	Direct Energy
<a href="mailto:angela.schorr@directenergy.com">angela.schorr@directenergy.com</a>	Direct Energy
<a href="mailto:ryan.harwell@directenergy.com">ryan.harwell@directenergy.com</a>	Direct Energy
<a href="mailto:johnbistranin@realgy.com">johnbistranin@realgy.com</a>	Realgy Corp.
<a href="mailto:kabraham@mpower.org">kabraham@mpower.org</a>	Katie Abraham, MMEA
<a href="mailto:mgobrien@aep.com">mgobrien@aep.com</a>	Indiana Michigan Power Company
<a href="mailto:mvorabouth@ses4energy.com">mvorabouth@ses4energy.com</a>	Santana Energy
<a href="mailto:suzy@megautilities.org">suzy@megautilities.org</a>	MEGA
<a href="mailto:tanya@meagutilities.org">tanya@meagutilities.org</a>	MEGA
<a href="mailto:general@itctransco.com">general@itctransco.com</a>	ITC Holdings
<a href="mailto:lpage@dickinsonwright.com">lpage@dickinsonwright.com</a>	Dickinson Wright
<a href="mailto:Deborah.e.erwin@xcelenergy.com">Deborah.e.erwin@xcelenergy.com</a>	Xcel Energy
<a href="mailto:mmpeck@fischerfranklin.com">mmpeck@fischerfranklin.com</a>	Matthew Peck
<a href="mailto:CANDACE.GONZALES@cmsenergy.com">CANDACE.GONZALES@cmsenergy.com</a>	Consumers Energy
<a href="mailto:JHDillavou@midamericanenergyservices.com">JHDillavou@midamericanenergyservices.com</a>	MidAmerican Energy Services, LLC
<a href="mailto:JCAltmayer@midamericanenergyservices.com">JCAltmayer@midamericanenergyservices.com</a>	MidAmerican Energy Services, LLC
<a href="mailto:LMLann@midamericanenergyservices.com">LMLann@midamericanenergyservices.com</a>	MidAmerican Energy Services, LLC
<a href="mailto:karl.j.hoesly@xcelenergy.com">karl.j.hoesly@xcelenergy.com</a>	Northern States Power
<a href="mailto:kerri.wade@teammidwest.com">kerri.wade@teammidwest.com</a>	Midwest Energy Coop
<a href="mailto:dixie.teague@teammidwest.com">dixie.teague@teammidwest.com</a>	Midwest Energy Coop
<a href="mailto:meghan.tarver@teammidwest.com">meghan.tarver@teammidwest.com</a>	Midwest Energy Coop
<a href="mailto:sarah.jorgensen@cmsenergy.com">sarah.jorgensen@cmsenergy.com</a>	Consumers Energy
<a href="mailto:Michael.torrey@cmsenergy.com">Michael.torrey@cmsenergy.com</a>	Consumers Energy
<a href="mailto:adella.crozier@dteenergy.com">adella.crozier@dteenergy.com</a>	DTE Energy
<a href="mailto:camilo.serna@dteenergy.com">camilo.serna@dteenergy.com</a>	DTE Energy
<a href="mailto:Michelle.Schlosser@xcelenergy.com">Michelle.Schlosser@xcelenergy.com</a>	Xcel Energy
<a href="mailto:dburks@glenergy.com">dburks@glenergy.com</a>	Great Lakes Energy

## GEMOTION DISTRIBUTION SERVICE LIST

[kabraham@mpower.org](mailto:kabraham@mpower.org)

[shannon.burzycki@wecenergygroup.com](mailto:shannon.burzycki@wecenergygroup.com)

[kerdmann@atcllc.com](mailto:kerdmann@atcllc.com)

[handrew@atcllc.com](mailto:handrew@atcllc.com)

[phil@allendaleheating.com](mailto:phil@allendaleheating.com)

Michigan Public Power Agency

Michigan Gas Utilities Corporation

American Transmission Company

American Transmission Company

Phil Forner