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February 25, 2021

Ms. Lisa Felice Acting Executive Secretary Michigan Public Service Commission 7109 West Saginaw Highway Post Office Box 30221 Lansing, MI 48909

## **RE:** Case No. U-20963 – In the matter of the application of Consumers Energy Company for authority to increase its rates for the generation and distribution of electricity and for other relief.

Dear Ms. Felice:

Enclosed for electronic filing in the above captioned case please find **Consumers Energy Company's Rate Case Summary.** This is a paperless filing and is therefore being filed only in a PDF format. I have also included a Proof of Service showing electronic service upon the parties to Case Nos. U-20134 and U-20697.

Sincerely,

Gary A. Gensch, Jr.

cc: Parties per Attachment 1 to Proof of Service

ConsumersEnergy One Energy Plaza Jackson, MI 49201-2357

www.consumersenergy.com

#### STATE OF MICHIGAN

#### BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter of the application of **CONSUMERS ENERGY COMPANY** for authority to increase its rates for the generation and distribution of electricity and for other relief.

Case No. U-20963

#### **CONSUMERS ENERGY COMPANY'S RATE CASE SUMMARY**

In accordance with the Michigan Public Service Commission's ("MPSC" or the "Commission") July 31, 2017 Order in Case No. U-18238, Consumers Energy Company ("Consumers Energy" or the "Company") submits its required Rate Case Summary. The Company's Rate Case Summary is being provided for informational purposes only, and in filing this summary, Consumers Energy states that modification may be made to its upcoming rate case filing that could impact the information contained herein.

The Company's most recent electric rate case, Case No. U-20697, was primarily driven by the Company's infrastructure investment and need to serve customers. In Case No. U-20697, Consumers Energy requested that the Commission authorize the Company to adjust its retail electric generation and distribution rates so as to provide additional revenue in the amount of \$244 million annually. This was based on a projected 12-month test year commencing on January 1, 2021 and ending on December 31, 2021. In its December 17, 2020 Order in Case No. U-20697, the Commission authorized Consumers Energy to adjust its retail electric generation and distribution rates so as to provide additional revenue in the amount of \$90 million, on a jurisdictional basis, with a Return on Equity of 9.90%.

The Company's upcoming electric rate case filing, Case No. U-20963, is being driven by the Company's continued infrastructure investment and need to serve customers. Based on the

evidentiary support provided in its upcoming filing, Consumer Energy requests that the Commission authorize the Company to adjust its retail electric generation and distribution rates so as to provide additional revenue in the amount of \$225 million annually based on a projected 12-month test year ending December 31, 2022. The Company is requesting a Return on Equity of 10.50%, and uses inflation factors of 1.20% for 2020, 2.50% for 2021, and 2.30% for 2022, as forecasted by IHS Global Insight.

A significant driver of the requested relief in this case is related to investments associated with solar generation, system reliability, environmental compliance, and enhanced technology. The Company is proposing to invest in capital projects on the distribution system, and incur operations and maintenance on the distribution system. Within those distribution costs, the Company is proposing to increase spending in its Line Clearing and Service Restoration programs. The Company is also requesting recovery of the new Company-owned solar generation costs expected as a result of the Company's 2019 and 2020 competitive solicitations implemented in accordance with the Settlement Agreement approved by the Commission in the Company's Integrated Resource Plan in Case No. U-20165 ("Case No. U-20165 Settlement Agreement").

Among other things, Consumers Energy is requesting rate recovery in this case for costs associated with: (i) its Commercial and Industrial and Residential Demand Response ("DR") programs, which provide the Company a flexible portfolio of resources that can be called upon during peak times of the system to reduce overall electricity demand, reducing power supply costs for all of the Company's generation customers; and (ii) the Conservation Voltage Reduction ("CVR") Program, which allows optimization of service-point voltages on the distribution system to reduce energy demand. The Company's testimony and exhibits address any variations between the DR and CVR capital costs presented in this case and those pre-approved for recovery in the Case No. U-20165 Settlement Agreement.

The Company's filing will also request the approval of: (i) recovery of the DR performance incentive and cumulative DR regulatory liability; (ii) the separation of DR-related costs from the overall revenue requirement and recovery of those costs through an all-encompassing DR surcharge; (iii) adjustments to the Company's current Electric Vehicle pilot programs; and (iv) a Home Battery Pilot for residential customers planned to consist of 2,000 home battery units at 1,000 homes across Consumers Energy's service territory, with two storage units at each home.

The Company is proposing a change to its cost-of-service study to allocate demand-related distribution costs using Voltage Peak, which measures the contribution of each rate class to the coincident peak demand at each level of the distribution system, thus aligning with how the Company sizes its facilities today. Consumers Energy is also proposing to update its calculation of the capacity-related component of its power supply charges included in base rates for use with the State Reliability Mechanism.

In addition, Consumers Energy is proposing various revisions to its electric rules, regulations, and tariffs. Among other things, Consumers Energy is proposing to: (i) allow renewable energy generating facilities spanning multiple parcels of property to transmit service off the premises to which it is delivered through the facilities' collector system; (ii) clarify the calculation of Outflow Demand credits under the Company's Distributed Generation Program; (iii) update the Peak Power Savers Program tariff language to reflect the ability for customers to participate in a variety of future DR programs and to be able to track their status and savings on their monthly bill; (iv) change the name of the Air Conditioner ("AC") Peak Cycling Program to

the Device Cycling Program, and provide for additional options to participate with a Water Heater Cycling Credit and a Back-Up Generator Cycling Credit; (v) reduce the AC Peak Cycling credit from \$8.00 per month to \$6.00 per month, and use the same methodology to establish credits for the Back-Up Generator and Water Heater pilots; (vi) eliminate the written contract requirement for standard service on Large General Service Primary Demand Rate GPD, General Service Primary Time-of-Use Rate GPTU, and Energy Intensive Primary Rate EIP, and to transition current contractual language to the tariff; (vii) modify the Large General Service Primary Demand Rate Interruptible Service Provision to remove language stating that the minimum On-Peak Billing Demand billed for the interruptible portion of a customer's bill is the contracted interruptible amount and to allow consideration of an increase or a decrease of the contracted amount within the annual contract period; (viii) replace current unmetered Light Emitting Diode ("LED") and HID rate options GU-LED and GUL with a single unmetered streetlighting service (UUL tariff), and update the conversion credit for municipal streetlighting customers who had paid to convert from the standard light types to an LED technology prior to the adoption of the current burnout replacement to LED program; and (ix) update tariff language to accommodate retailer specific requests and to grandfather certain retailer metering arrangements.

For the projected test year, the Company's average overall rate increase will be approximately 5.5%. The Company's proposed rate increase/decrease by rate class and rate schedule are attached to this Rate Case Summary as Attachment A.

The key drivers associated with the Company's revenue requirement are:

	Key Drivers: Revenue Requirement					
	Drivers	Revenue Requirement Impact (\$ Millions)				
a.	Infrastructure Investment & Related Costs	121				
b.	Cost of Capital	53				
с.	Operating Expenses	76				
d.	Sales/Revenue	(25)				
е	Total Revenue Requirement Impact	\$ 225				

The revenue requirement associated with rate base is as follows:

Key Drivers: Rate Base (000)					
	Drivers		Rate Base Impact (rate base 13-month average)		
a.	Last Rate Base Order (U-20697)	\$	11,660,442	\$	1,879,015
b.	Utility Plant		1,407,619		132,580
с.	Depreciation Reserve		(346,781)		(24,517)
d.	Working Capital		184,578		13,050
e.	Requested Rate Base	\$	12,905,858	\$	2,000,126
f.	Increase from Last Rate Base Order		1,245,416	\$	121,112

In addition to the requests described above, Consumers Energy will be seeking Commission approval of certain accounting requests. The Company is proposing to continue to utilize deferred accounting associated with actual capital spending in the event the Commission's final order in this proceeding sets capital spending levels for recovery in rates at amounts below the amount requested in the following distribution programs: New Business, Demand Failures, and Asset Relocation. The Company is also requesting Commission approval for the use of regulatory assets or regulatory liabilities, as needed, if the following proposals are approved: (i) the deferred Service Restoration cost proposal; and (ii) the Home Battery Pilot proposal. Consumers Energy intends to file its upcoming electric rate case on March 1, 2021, which will allow for new rates to be effective January 1, 2022.

Respectfully submitted,

CONSUMERS ENERGY COMPANY

Dated: February 25, 2021

By:

Bret A. Totoraitis (P72654) Anne M. Uitvlugt (P71641) Robert W. Beach (P73112) Gary A. Gensch, Jr. (P66912) Michael C. Rampe (P58189) Ian F. Burgess (P82892) One Energy Plaza Jackson, Michigan 49201 Attorneys for Consumers Energy Company (517) 788-0835

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# ATTACHMENT A

#### MICHIGAN PUBLIC SERVICE COMMISSION

Consumers Energy Company Summary of Present and Proposed Pro Forma Revenues by Rate Schedule U-20963

	( a )		(b)		( c )		( d )	( e )
Line			Rev	Revenue			Net Increase	/ (Decrease)
No.	Description		Present		Proposed		Revenue	Percent
			\$000		\$000		\$000	%
	BUNDLED SERVICE							
	Residential Class							
1	Summer On-peak RSP	\$		\$	2,302,741	\$	186,984	8.8
2	Smart Hours RSH		10,155		11,076		920	9.1
3	Night Time Savers RPM		1,244		1,359		115	9.2
4	Non-Transmitting Meters RSM		27,809		30,157		2,348	8.4
5	Total Residential Class	\$	2,154,966	\$	2,345,333	\$	190,367	8.8
	Secondary Class						(	(1.0)
6	Energy-only GS	\$	,	\$	572,520	\$	(10,589)	(1.8)
7	Time-of-Use GSTU		1,409		1,328		(81)	(5.7)
8	Demand GSD	_	390,478		400,009	_	9,531	2.4
9	Total Secondary	\$	974,995	\$	973,856	\$	(1,139)	(0.1)
	Primary Class							
10	Energy-only GP	\$	,	\$	87,746	\$	2,561	3.0
11	Demand GPD		333,190		361,393		28,203	8.5
12	Time-of-Use GPTU		454,153		458,890		4,737	1.0
13	Energy Intensive EIP	_	27,942	_	30,484		2,542	9.1
14	Total Primary	\$	900,470	\$	938,513	\$	38,043	4.2
	Lighting & Unmetered Class							
15	Metered Lighting GML	\$		\$	1,324	\$	(118)	(8.2)
16	Universal Unmetered Lighting UUL		27,334		23,131		(4,203)	(15.4)
17	Unmetered GU	_	9,651		10,180		529	5.5
18	Total Lighting & Unmetered	\$	38,427	\$	34,635	\$	(3,792)	(9.9)
	Self-generation Class							
19	Small Self-generation GSG-1	\$		\$	-	\$	-	NA
20	Large Self-generation GSG-2	_	5,065		5,158		93	1.8
21	Total Self-generation	\$	5,065	\$	5,158	\$	93	1.8
22	Total Bundled Service	\$	4,073,923	\$	4,297,496	\$	223,572	5.5
	ROA SERVICE							
	Secondary Class							
23	Energy-only GS	\$	-	\$	1,019	\$	(99)	(8.8)
24	Demand GSD	_	6,584		6,710		126	1.9
25	Total Secondary	\$	7,702	\$	7,729	\$	28	0.4
	Primary Class							
26	Energy-only GP	\$		\$	1,108	\$	(71)	(6.0)
27	Demand GPD	_	19,089		21,010		1,922	10.1
28	Total Primary	\$	20,267	\$	22,118	\$	1,851	9.1
29	Total ROA Service	\$	27,969	\$	29,848	\$	1,879	6.7
30	Total Jurisdictional Service	\$	4,101,892	\$	4,327,343	\$	225,451	5.5
31	Less: PSCR Factor Revenues		17,229		17,229		0	
32	Less: GSG-2 and GI-2 PSCR Revenues	_	5,582		5,871		288	
33	Total Jurisdictional Base Revenues	\$	4,079,081	\$	4,304,243	\$	225,162	
34	Rounding	-		_	(62)	_	(62)	
35	Total Jurisdictional Base Revenues			\$	4,304,181	\$	225,101	
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#### STATE OF MICHIGAN

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In the matter of the application of **CONSUMERS ENERGY COMPANY** for authority to increase its rates for the generation and distribution of electricity and for other relief.

Case No. U-20963

#### **PROOF OF SERVICE**

STATE OF MICHIGAN ) ) SS COUNTY OF JACKSON )

Jennifer Joy Yocum, being first duly sworn, deposes and says that she is employed in the Legal Department of Consumers Energy Company; that on February 25, 2021, she served an electronic copy of **Consumers Energy Company's Rate Case Summary** upon the persons listed in Attachment 1 hereto, at the e-mail addresses listed therein.

Jemit Dog Youm

Jennifer Joy Yocum

Subscribed and sworn to before me this 25<sup>th</sup> day of February, 2021.

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Melissa K. Harris, Notary Public State of Michigan, County of Jackson My Commission Expires: 06/11/2027 Acting in the County of Jackson

#### ATTACHMENT 1 TO CASE NO. U-20963 (Parties to Case Nos. U-20134 and U-20697)

#### **Counsel for the Michigan Public Service Commission Staff**

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#### ATTACHMENT 1 TO CASE NO. U-20963 (Parties to Case Nos. U-20134 and U-20697)

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#### ATTACHMENT 1 TO CASE NO. U-20963 (Parties to Case Nos. U-20134 and U-20697)

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