

DTE Electric Company  
One Energy Plaza, 1650 WCB  
Detroit, MI 48226-1279



Carlton D. Watson  
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September 29, 2021

Ms. Lisa Felice  
Executive Secretary  
Michigan Public Service Commission  
7109 West Saginaw Highway  
Lansing, MI 48917

Re: In the matter of the Application of **DTE ELECTRIC COMPANY** for approval of a partial waiver of the Consumers Standards and Billing Practices for Electric Residential Service and approval of a Voluntary Prepay Billing Program  
MPSC Case No. U-21087

Dear Ms. Felice:

Attached for electronic filing in the above-captioned matter is DTE Electric Company's Application and Direct Testimony and Exhibits of Witness, Michael J. Hatsios. Also is attached is a Proof of Service.

Very truly yours,

Carlton D. Watson

CDW/erb  
Attachments  
cc: Service List

**STATE OF MICHIGAN**  
**BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

In the matter of the application of **DTE Electric**     )  
**Company** for the approval of a partial waiver of     )  
the Consumer Standards and Billing Practices for     )  
Electric Residential Service and approval of a     )  
Voluntary Prepay Billing Program.     )

Case No. U-21087

**APPLICATION**

DTE Electric Company (hereinafter referred to as “Company” or “DTE Electric”) files this Application requesting authority from the Michigan Public Service Commission (“Commission” or “MPSC”) for approval of a waiver to certain requirements the Consumer Standards and Billing Practices for Electric and Natural Gas Service Rules (“Billing Rules”), and for approval of the Company’s proposal to implement a program offering a prepaid electric customer billing option. In support thereof, the Company states as follows:

1. DTE Electric is a corporation organized and existing under and by virtue of the laws of the State of Michigan, with its principal office at One Energy Plaza, Detroit, Michigan 48226. DTE Electric is a wholly-owned subsidiary of DTE Energy Company supplying retail electric service to 2.1 million customers located in Southeast Michigan. The Company is a public utility with more than 1,000,000 retail customers in Michigan and is therefore subject to the jurisdiction of the Commission per various provisions of 1919 PA 419, as amended, MCL 460.51 *et seq.*; 1939 PA 3, as amended MCL 460.1 *et seq.*; and 2008 PA 295, as amended MCL 460.1001 *et seq.*

2. DTE Electric company files this Application to request approval of the its Prepay Program as well as requisite waivers of the Billing Rules needed to implement the Prepay Program.

Cost recovery for Prepay will be requested in a future rate case filing along with the other identified portfolio of Customer IT capital projects.

3. The goal of this voluntary Prepay Program is to create a satisfying option for a healthy mix of customer segments, to engage customers in the active monitoring and management of their consumption, to reduce energy consumption for program participants, to provide financially vulnerable customers a simplified experience and a mechanism to more easily reduce past due balances, and to achieve high levels of satisfaction and retention for program participants.

4. This voluntary Prepay Program allows customers to provide prepayment for their energy prior to its use. DTE Electric plans to launch enrollments in the first quarter 2022. To achieve this target, DTE Electric will need to complete the programming in the fourth quarter of 2021.

5. The Prepay Program will feature methods to gather customer feedback for improvement of the customer experience; as such, the Company may change program features after launch, but it will consult with Commission Staff and interested parties when such changes are considered.

6. For this program, “Customer” is defined as a residential customer taking service under the Company’s D1 Rate Schedule with single electric commodity and an AMI meter with remote connection and disconnection capability currently installed at the premise.

7. In order to implement the Company’s Prepay Program, waivers of several of the Commission’s Billing Rules primarily related to shutoff of service are required. Specifically, the Company requires a waiver of the following Billing Rules: 460.120 (3), 460.129(4), 460.139(1), 460.139(6), 460.140(1), 460.140(2) and 460.143(1).

8. In support of this Application, DTE Electric submits the testimony and exhibits of Michael J. Hatsios, Director- Customer Service Operations, which is attached and incorporated herein. Mr. Hatsios more specifically provides the purpose behind the requested Billing Rule waivers as well as specifics related to customer segments, program design, customer experience and prepay protections.

WHEREFORE, Applicant requests that the Commission enter an Order:

- A. Accepting this Application for filing.
- B. Approving DTE Electric's request for approval of its Prepay Program.
- C. Waiving the Rules 460.120 (3), 460.129(4), 460.139(1), 460.139(6), 460.140(1), 460.140(2) and 460.143(1) of the Michigan Administrative Code in order to allow DTE Electric to implement the Prepay Program.
- D. Granting DTE Electric with such further additional relief as the Commission deems appropriate.

DTE ELECTRIC COMPANY

By: \_\_\_\_\_  
Attorney for the Applicant  
Carlton D. Watson (P77857)  
One Energy Plaza, 1650 WCB  
Detroit, Michigan 48226  
(313) 235-6648

Date: September 29, 2021

**STATE OF MICHIGAN**  
**BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

In the matter of the Application of )  
**DTE ELECTRIC COMPANY** )  
for approval of a partial waiver of the Consumers )  
Standards and Billing Practices for Electric )  
Residential Service and approval of a Voluntary )  
Prepay Billing Program )  
\_\_\_\_\_ )

Case No. U-21087

QUALIFICATIONS  
  
AND  
  
DIRECT TESTIMONY  
  
OF  
  
MICHAEL J HATSIOS

**DTE ELECTRIC COMPANY**  
**QUALIFICATIONS AND DIRECT TESTIMONY OF MICHAEL J HATSIOS**

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1   **Q1.   What is your name, business address and by whom are you employed?**

2   A1.   My name is Michael J Hatsios (he/him/his), and my business addresses is One  
3       Energy Plaza, Detroit, Michigan, 48226. I am employed by DTE Energy Corporate  
4       Services, LLC, a subsidiary of DTE Energy.

5

6   **Q2.   On whose behalf are you testifying?**

7   A2.   I am testifying on behalf of DTE Electric Company (DTE Electric or Company).

8

9   **Q3.   What is your educational background?**

10  A3.   I earned a bachelor's degree in Mechanical Engineering from Lawrence  
11       Technological University in Southfield, MI, and a master's degree in Business  
12       Administration from the University of Michigan, Ann Arbor.

13

14  **Q4.   What is your previous work experience?**

15  A4.   Prior to joining DTE, I was employed in various roles as a design and  
16       manufacturing engineer for Ford Motor Company and Visteon Automotive. I  
17       joined DTE in 2001 and since then I have held positions of increasing responsibility  
18       in our non-regulated subsidiaries, Treasury, the Controller's Office, Fossil  
19       Generation, Enterprise Performance Management (EPM), and Customer Service.

20

21  **Q5.   What is your current position and what are your current responsibilities?**

22  A5.   Currently, I am the Director of the Customer Service Transformation team. In this  
23       role, I am responsible for the identification and implementation of opportunities to  
24       leverage new processes, technologies, and programs that will enhance the Customer  
25       Experience and improve operational efficiencies.

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1 **Part 1. Purpose Statement**

2 **Q6. What is the purpose of your testimony?**

3 A6. The purpose of my direct testimony is to describe the Company's efforts to design  
4 and implement a voluntary prepay billing program that will provide an attractive  
5 option for DTE Electric customers who want to gain more visibility and control  
6 over their energy usage, who like the idea of paying what they want, when they  
7 want, and who may struggle to make timely payments on the billing and payment  
8 plans currently offered.

9  
10 Specifically, my testimony will describe the design and mechanics of a voluntary  
11 prepay billing program, how it differs from a monthly post-pay billing model, how  
12 different segments of customers can benefit from enrollment in a prepay program,  
13 what billing rule waivers will be required to implement a prepay program, and what  
14 customers will experience through their participation in a prepay program.

15

16 **Q7. Are you asking for recovery of the costs associated with prepay in this filing?**

17 A7. No. The purpose of this filing is to seek approval for the Company to offer a  
18 voluntary prepay program ("DTE PrePay" or "PrePay") and the associated and  
19 required billing rule waivers. Cost recovery for DTE PrePay will be requested in a  
20 future DTE Electric rate case filing along with the other identified portfolio of  
21 Customer IT capital projects.

22

23 **Q8. Are you sponsoring any exhibits in this Case?**

24 A8. Yes, I am sponsoring the following three exhibits:

25

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1	<u>Exhibit Number</u>	<u>Description</u>
2	A-1	DTE PrePay Customer Journeys
3	A-2	DTE PrePay Draft Terms & Conditions
4	A-3	DTE PrePay Draft Frequently Asked Questions (“FAQs”)

5

6 **Q9. Were these exhibits prepared under your guidance and supervision?**

7 A9. Yes, they were.

8

9 **Part 2. PrePay Case for Change and Desired Outcomes**

10 **Q10. How does a prepaid electricity program work?**

11 A10. At its core, the concept of prepay is simple and is consistent across electric utility  
 12 programs (which I will discuss further). Participants with electric AMI meters  
 13 purchase electricity in advance by adding credits to their account. As their account  
 14 credits reach predetermined low levels, the customer is notified, based on their  
 15 preference (email, SMS/text), that they are at risk of a loss of service along with an  
 16 estimate of the number of days of usage remaining. In the event the customer fails  
 17 to replenish their account and the balance drops below zero, the customer is  
 18 remotely disconnected. While there are no deposits or reconnection fees, the  
 19 customer typically needs to add a sufficient amount of money to their account to  
 20 cover the cost of any unpaid usage and to maintain a minimum credit balance.  
 21 Prepay customers are able to check their balance, view their energy consumption,  
 22 and replenish their accounts anytime they want through various service channels.

23

24 **Q11. Do other utility companies offer a prepay option for customers?**



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1 A11. Yes. Prepay is a very well-established form of payment for many services,  
2 including fuel, public transport, and mobile communications, and has generated  
3 significant interest in recent years with electric utilities in the United States. As of  
4 the end 2017, it was estimated there were hundreds of active utility prepay  
5 programs in the U.S., with some forecasts at that time projecting there would be  
6 between 2.6 and 2.9 million active AMI prepaid meters in the U.S. by the end of  
7 2021.

8

9 Although we could not find any recently published data regarding the actual  
10 number of currently active AMI prepaid meters, and while the vast majority of the  
11 active prepay programs are deployed at rural electric cooperatives and municipal  
12 utilities, many large utilities, including several Investor Owned Utilities (IOUs),  
13 have piloted or commercialized prepay offerings for their customers.

14

15 Figure 1 - Large Utilities with Active Prepay Offerings



16

17 The Company has been in contact with Salt River Project (SRP), Georgia Power,  
18 and Duke Energy regarding their experiences with prepay billing, and is a  
19 participating member of the Prepay Energy Working Group (PEWG), a consortium

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1 of industry professionals who share learnings and discuss the opportunities and  
2 challenges associated with prepay billing programs. The Company is also  
3 leveraging lessons learned from its own “Pay As You Go” pilot, which was offered  
4 to DTE Electric customers from 2011 through mid-2015, and Consumers Energy’s  
5 experience with their “Pay My Way” prepay program, which was available to their  
6 customers from 2016 through June of 2020.

7

8 We have captured best practices and lessons learned from these discussions and our  
9 own experiences and have incorporated them into over 100 documented program  
10 requirements, which are informing the design and implementation of our proposed  
11 voluntary DTE PrePay program.

12

13 **Q12. Which customer segments does the Company believe would be most interested**  
14 **in, and benefit most from, participation in Prepay?**

15 A12. We are designing PrePay as a voluntary option for all residential customers, with  
16 some restrictions, regardless of geography or their financial status, recognizing that  
17 different customer segments have different needs and will benefit differently from  
18 enrollment in PrePay.

19

20 Generally speaking though, PrePay will provide participating customers: 1)  
21 visibility into, and a greater sense of control over, their energy usage and how much  
22 they spend; 2) the ability to pay on a schedule that they establish and that better  
23 meets their needs, as opposed to the post-pay model where the Company tells them  
24 every month what they used, how much they owe, and when payment is due; and  
25 3) a simplified billing experience that eliminates the need for what some customers

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1 find a complicated monthly bill. An additional benefit of PrePay, for customers  
2 with past due balances, is the ability to apply a portion of each prepayment they  
3 make towards the reduction of any past due balance (a process I will discuss in  
4 more detail in a subsequent portion of my testimony).

5  
6 I've provided below an overview of the case for change and anticipated customer  
7 benefits for four segments of customers that would benefit most from enrollment  
8 in the Company's PrePay program. Within these segments the Company has  
9 identified four unique customer "personas" and associated customer journeys,  
10 which I've described in Exhibit A-1.

11  
12 *1. Young and Tech Savvy*

13 "Tech Savvy" customers tend to be younger and tend to have a greater desire to  
14 look for ways to conserve energy and reduce their carbon footprint, as evidenced  
15 by the over 190,000 unique customers who have downloaded the DTE Insight App,  
16 and the 40,000 residential customers who have enrolled in the Company's  
17 Michigan Green Power (MIGP) programs, with enrollments among the 18-39 year  
18 age group significantly increasing over the last 18 months. PrePay will provide an  
19 additional option for this segment of customers to further engage in how much  
20 electricity they are using, to make payments based on their needs and when it's  
21 convenient for them, and to further reduce their usage and carbon footprint.

22  
23 *2. Financially Stable Savers*

24 Many customers are financially stable and don't have issues paying their bills, but  
25 they do pay attention to, and look for ways to more effectively manage, their

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1 monthly expenses. On average, the Company receives over 1.2 million billing calls  
2 from customers every year who have questions about the amount of their bill, their  
3 account balance, or other charges and information on the bill. Of this total, it is  
4 estimated that 15% are from customers who repeatedly call to inquire about their  
5 bill, often times because they are questioning the usage and/or the amount of the  
6 bill. While the Company has trained CRs to handle these inquiries and address  
7 customer questions and concerns, these conversations can leave some customers  
8 still confused, still frustrated, and still with the perception that their bill is incorrect.  
9 Customers who repeatedly question the usage shown on their bill, or who are often  
10 surprised by the amount of their bill, could benefit from enrollment in PrePay  
11 because it would simplify their billing experience, put them in control of the energy  
12 they use and how much they spend each month, and eliminate monthly high bill  
13 surprises.

14  
15 *3. Renters and College Students*

16 For renters and college students, PrePay offers several benefits. These customers  
17 tend to move more frequently than typical residential customers. PrePay eliminates  
18 the need for complicated ID validations and document submissions, with customers  
19 simply required to provide a photo ID and confirmation of their current address.  
20 Additionally, for renters and college students with roommates, PrePay provides  
21 easy visibility into how much energy is being used each day and what they are  
22 spending, allowing roommates to discuss the importance of watching their energy  
23 usage to reduce shared monthly expenses. For parents of college students, PrePay  
24 provides the ability to actively monitor their college student's usage and work  
25 together to minimize monthly utility expenses.

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1           4. Payment Troubled and Vulnerable Customers

2           Many lower-income customers “live in the financial moment” and may struggle  
3           with traditional post-pay monthly billing due to a lack of financial stability and  
4           inconsistencies in their income streams. Additionally, some customers who may  
5           not necessarily struggle this way financially, can find themselves in financially  
6           troubled situations due to circumstances beyond their control, such as the  
7           unexpected loss of income. Regardless of the circumstance, customers who find  
8           themselves financially struggling experience significant stress, often wait until the  
9           last minute to pay, often pay late, can accumulate large arrears balances, and can  
10          find themselves disconnected for non-payment.

11

12          For context, in a typical year, the Company processes over 60,000 late payment  
13          holds for DTE residential electric customers, providing customers who request a  
14          hold with 10 additional days to pay their bill. DTE Electric also processes over  
15          160,000 electric meter disconnects and over 124,000 electric meter restores in a  
16          typical year, and while the Company provides support to these customers through  
17          access to agency funding and a variety of payment plan options, not all customers  
18          qualify for energy assistance or enrollment in a plan. Those who do qualify  
19          experience varying levels of success depending on the amount owed, the plan in  
20          which they are enrolled, and their ability to consistently pay their plan amount and  
21          their current month’s usage. Late fees and the added costs of deposits and reconnect  
22          charges put additional stress on these customers, many of whom are stuck in a  
23          repeated cycle of disconnects and reconnects, and who have to make tough choices  
24          about which monthly bills get paid, and which ones don’t.

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1 PrePay will be another tool for the Company and its Customer Representatives  
2 (“CRs”) to assist customers for whom traditional billing and payment plans don’t  
3 work, allowing this segment of customers to take more control and responsibility  
4 for the energy they use, to decide when and how much they pay based on their  
5 financial situation and anticipated usage patterns, and to avoid the stress that comes  
6 with receiving a monthly bills that they cannot afford.

7

8 **Q13. What outcomes does the Company hope to achieve with PrePay?**

9 A13. The Company is designing its voluntary PrePay program through the lens of the  
10 identified customer segments who could most benefit from enrollment in the  
11 program. The goal is to create a satisfying option for a healthy mix of customer  
12 segments, to engage customers in the active monitoring and management of their  
13 consumption, to reduce energy consumption for program participants, to provide  
14 financially vulnerable customers a simplified experience and a mechanism to more  
15 easily reduce past due arrears balances (which I will discuss in a subsequent portion  
16 of my testimony), and to achieve high levels of satisfaction and retention for  
17 program participants.

18

19 Providing customers with another option to reduce their energy consumption and  
20 reduce their arrears directly supports the Company’s strategic priorities of: 1)  
21 creating products and programs to help customers save money; 2) contributing to  
22 the reduction of greenhouse gas emissions; 3) creating customer rate affordability  
23 by reducing bad debt expense; and 4) improving the experience for financially  
24 challenged and low-income customers.

25

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1 **Q14. By how much is PrePay expected to reduce a customer's energy consumption?**

2 A14. The amount of energy savings resulting from enrollment in PrePay depends on  
3 customer usage patterns and the level of engagement they have in changing their  
4 behavior in response to how much they are spending to replenish their PrePay  
5 account. According to a 2018 report by the American Council for an Energy  
6 Efficient Economy (ACEEE), customers who participate in a prepay program  
7 reduce their energy usage by 9% on average, which is within the range of prior  
8 ESource studies that concluded customers enrolled in a prepay program realize  
9 energy reductions of 5-14%. Our own experience with our Pay As You Go pilot is  
10 consistent with these findings, which, for the small group of 23 pilot participants  
11 who were actively enrolled in the pilot for at least 11 months, resulted in weather  
12 normalized reductions in usage of 6%.

13

14 **Part 3. Program Design and the Customer Experience**

15 **Q15. Can you elaborate on the specifics of the design and implementation of DTE**  
16 **PrePay?**

17 A15. Yes. First of all, it is important to note that the Company intends to implement  
18 PrePay in two phases. **Phase 1** includes the design and development of all of the  
19 core prepay functionality, will provide customers visibility into their usage,  
20 payments, and prepaid balance (e.g. number of days of usage remaining) in the self-  
21 service channels, and will allow customers to manage payment and communication  
22 preferences on the DTE website. **Phase 1** will limit program enrollment and  
23 unenrollment to its live agent CR channel, and will also set strict eligibility  
24 requirements for enrollment in the program (as outlined in a subsequent section of  
25 my response to this question). In **Phase 2** of the project, full enrollment capabilities

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1 will be expanded to the DTE website in a manner that is consistent with the CR  
2 enrollment experience. **Phase 2** will also expand the eligibility requirements and  
3 provide customers with the ability to customize the frequency and/or threshold at  
4 which they receive their low balance alerts.

5

6 In regards to the more specific question related to the design and mechanics of the  
7 program, I've summarized key program design attributes across six categories of  
8 the customer experience – 1) *Eligibility*, 2) *Enrollment*, 3) *Account Management &*  
9 *Notifications*, 4) *Disconnection/Reconnection*, 5) *Customer Feedback*, and 6)  
10 *Unenrollment*.

11

12 1. *Eligibility*

13 For participation in **Phase 1** of this voluntary DTE PrePay program, an “eligible  
14 customer” is defined as residential, being provided service through the Company’s  
15 D1 Residential Service Rate schedule, with a single electric commodity, and having  
16 an active AMI meter with remote connection and disconnection capability.  
17 Customers with past due balances (e.g. electric arrears) will be eligible to enroll,  
18 but can only do so up to a maximum of \$750 in arrears, which will be reduced over  
19 time through the allocation of a portion of each prepayment made by the customer,  
20 which I describe in more detail under the *Enrollment* and *Account Management &*  
21 *Notifications* section of my response to this question.

22

23 In addition to the above baseline eligibility requirements, the Company has  
24 established several other eligibility restrictions to protect customers and to support  
25 a phased implementation, all of which are consistent with best practices of other



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utility prepay providers. Table 1 summarizes the proposed eligibility requirements across each phase of the implementation.

Table 1 – DTE PrePay Customer Eligibility Summary

Type of Customer	Phase 1	Phase 2
Medical Emergency Self	N	N
Medical Emergency Household	N	N
Active Military Service	N	N
Seniors with Winter Protection Plan (WPP)	N	N
Multiple Meters (e.g. Interruptible AC)	N	N
Customers with Multiple Premises	N	N
Enrolled in Other Payment Plans (e.g. BWB,SPP, LSP)*	N	N
Enrolled in Non-Payment Programs (e.g. MIGP, HPP)*	N	Y
Dual Commodity Customer	N	Y

\* BWB = Budget Wise Billing; SPP = Shutoff Protection Plan; LSP = Low Income Self-Sufficiency Plan; MIGP = Michigan Green Power; HPP = Home Protection Plan

***To clarify the above:***

1. Customers with documented medical restrictions, or who indicate they have medical restrictions, seniors on WPP, customers with multiple meters, and customers with multiple premises will **NOT** be eligible for PrePay during **Phase 1** or **Phase 2** of the program.
2. Customers enrolled in other payment plans, while not eligible to enroll in PrePay since these plans are not compatible with the prepay model, will have the option to voluntarily unenroll from these programs and enroll in PrePay

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1 should they decide it would be advantageous for them to do so. However,  
2 customers enrolled in the Company's Low Income Self-Sufficiency program  
3 ("LSP"), and the associated D1.6 Residential Service Special Low Income Pilot  
4 Rate, will be referred to the Company's LSP Advocacy Team to assess the  
5 appropriateness of the customer's request to enroll in PrePay. Similarly,  
6 customers who enroll in the Company's new and pending Payment Stability  
7 Plan ("PSP") will also be referred to the Company's Advocacy Team should  
8 they express an interest in enrolling in PrePay.

9 3. In regards to PrePay enrollment for customers on other residential rates, with  
10 95% of customers on the D1 Residential Service Rate, the Company saw no  
11 benefit to complicating the PrePay experience or incurring the additional costs  
12 to build the functionality necessary to enable enrollment for other residential  
13 rates. The Company is however considering the inclusion of TOU (Time-of-  
14 Use) rates as part of the **Phase 2** implementation, which I discuss in more detail  
15 in a subsequent section of my response to this question.

16 4. **Phase 2** of the project will expand eligibility to include dual commodity (DTE  
17 Gas and DTE Electric) customers and customers enrolled in other Company  
18 non-payment plan programs.

19

20 In regards to TOU rates, in accordance with Michigan Public Service Commission  
21 ("MPSC") order No. U-20602, the Company launched a TOU pilot in March 2021  
22 to assess the impacts of two TOU rates, each with an opt-in and opt-out component.  
23 As the Company continues to assess the results of the TOU pilot, it remains in  
24 active discussions with the MPSC on plans for the full implementation of TOU.  
25 Due to the uncertainty on the final design and implementation of TOU rates, the

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1 Company has deferred the investment required to provide PrePay to TOU  
2 customers, and likely will suggest that the D1 rate remain active for PrePay  
3 customers, as TOU rates would complicate the PrePay experience.

4

5 2. Enrollment

6 As previously indicated, **Phase 1** of the PrePay implementation will be limited to  
7 enrollment through a live CR only and will not be available on the DTE website.  
8 While there will be information related to PrePay on the website, it will be limited  
9 to basic program information, contact information, links to Terms and Conditions  
10 (Exhibit A-2), and a list of FAQs (Exhibit A-3).

11

12 The website, and other PrePay promotional materials, will include a PrePay phone  
13 number for interested customers, with their call directed to dedicated and specially  
14 trained teams of CRs who can best answer their questions and manage the  
15 enrollment. Customers will be informed of their rights and responsibilities under  
16 the program, including their waiving of the right to receive written (i.e. USPS mail)  
17 communications and live agent phone calls ahead of a scheduled disconnect.  
18 Customers will be required to provide a valid email address for the purposes of  
19 receiving enrollment information and a copy of the full program terms and  
20 conditions, and to serve as their primary means of receiving balance alerts and other  
21 notifications. However, all customers will have the option of opting-in to SMS/text  
22 alerts, with customers who select this option receiving both email and SMS/text  
23 notifications.

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Customers who enroll in PrePay will be asked to make an initial credit deposit of \$40 at the time of enrollment, all of which will go towards their future consumption, or in the case of customers who choose to roll over a past due balance, 80% will go towards their future consumption and 20% will be applied to any past due balance through the PrePay Deferred Payment Plan (“DPP”), with customers able to rollover a total of \$750 in electric arrears and unpaid current bill amounts into the DPP. Figure 2 provides a view of the planned PrePay CR enrollment experience.

Figure 2 - Prepay CR Enrollment Summary

### Enrolled By CSR

With Arrears



Customer enrolls over the phone with a DTE customer service rep

- Terms explained and agreed to
- Customer provides valid email address
- Customer asked if they would like SMS texts
- Initial payment taken over the phone
- Past Balance Payoff Plan set up (if Arrears)

Welcome email sent

*Active links to full  
Terms & Conditions and  
Profiles & Preferences*

### Welcome Email

**DTE**

Welcome to DTE PrePay

Dear John,

We're pleased to confirm your enrollment in DTE PrePay, a new way of paying for energy that puts you in control. Look for an upcoming email that will provide more details about your new PrePay account. Please also review the [DTE PrePay Terms & Conditions](#) for program information.

To start, sign in to view your [Profile & Preferences](#), and use the [Manage Notifications](#) button to set up or make changes to your alerts. DTE PrePay alerts will notify you when your remaining energy is low and it's time to add funds.

**Account Number:**

9200 117 2521 5

**Service Address:**

30339 Timberidge Ln,  
Detroit, MI 48336

**Enrollment Date:**

3/24/2021

Best regards,

Your DTE Customer Service Team

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This is an automated email, so please do not reply.  
Email sent by: DTE Energy, One Energy Plaza, Detroit,  
MI 48226-1279 USA

### 3. Account Management & Notifications

After enrollment, customers will be able to view the estimated daily usage amount for their premise in both kWh and dollars, along with the number of days of

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1 estimated usage remaining, on the DTE website, on their mobile web device, via  
2 the automated phone system (“IVR”), or through a request to a CR. Customers will  
3 also receive low balance notifications through email, and optionally SMS/text.  
4 messages, at five, three and one day prior to reaching a zero balance. Additionally,  
5 if desired, customers can sign up for daily balance notifications.

6  
7 Customers enrolled in PrePay will be able to make one-time payments through a  
8 DTE CR, on the DTE website, in the Mobile App, in the IVR, or at a Kiosk, with  
9 these payments posting in real-time to their PrePay account. While customers can  
10 continue to make payments through an Authorized Pay Agent (“APA”), or via U.S.  
11 mail, these methods of payments are not recommended due to the inherent delays  
12 between when the payment is made and when it would be posted to a customer’s  
13 PrePay account. Future dated payments can be scheduled through a DTE CR in the  
14 same manner as they are today, with customers also offered the ability to set up an  
15 auto reload of prepay credits in an amount and at a threshold of days remaining that  
16 they choose. Customers who enroll in PrePay on the DPP, will have 20% of each  
17 payment they make applied to their past due balance, with the remaining 80% put  
18 towards future consumption. Figures 3, 4 and 5 summarize the customer *Account*  
19 *Management & Notification* experience, which includes what they will see when  
20 they log into their account, how they can enroll in optional SMS/text messages,  
21 how they make payments and enroll in auto reload, and what they will be provided  
22 in the low balance alerts.

Figure 3 - Balance Updates & Preference Center Experience

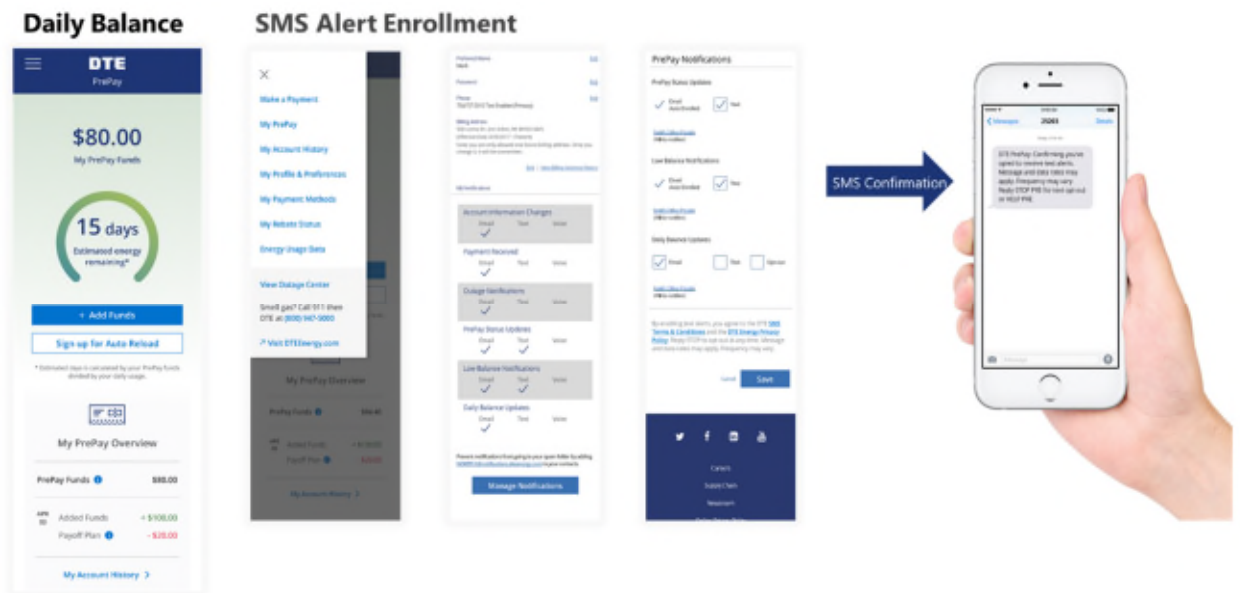


Figure 4 - Payments & Auto-Reload Customer Experience

## Adding funds via one-time payment method

The sequence of screens for adding funds via one-time payment method is as follows:

- Add PrePay Funds**: Shows Prepay Funds at \$521 and Average Daily Cost at \$162. Options for Prepay amount (\$50, \$100, \$150, \$200, \$250, \$300, \$350, \$400, \$450, \$500, \$550, \$600, \$650, \$700, \$750, \$800, \$850, \$900, \$950, \$1000) and Payment method (Credit/Debit Card, PayPal, Venmo, Apple Pay, Google Pay).
- Add PrePay Funds**: Shows Prepay Funds at \$617 and Average Daily Cost at \$162. Options for Prepay amount (\$50, \$100, \$150, \$200, \$250, \$300, \$350, \$400, \$450, \$500, \$550, \$600, \$650, \$700, \$750, \$800, \$850, \$900, \$950, \$1000) and Payment method (Credit/Debit Card, PayPal, Venmo, Apple Pay, Google Pay).
- Review & Submit**: Shows Payment Date, Amount, and Method. A 'Submit Payment' button is at the bottom.
- Thank you for your payment**: Shows Confirmation Number and Payment Date. A 'View Details' button is at the bottom.
- My PrePay Funds**: Shows a balance of \$124.79 and a 20-day estimated energy saving. A 'View Details' button is at the bottom.

## Pending Payment

Notified by email (prepared) and SMS (once they opted in).



Customer receives confirmation of receipt of payment and addition of credits, along with confirmation of payment posting

## Set Up Auto Reload

The sequence of screens for setting up auto reload is as follows:

- Set Up Auto Reload**: Shows Auto Reload status at 'OFF' and Average weekly cost at \$16.12. Options for Auto Reload amount (\$50, \$100, \$150, \$200, \$250, \$300, \$350, \$400, \$450, \$500, \$550, \$600, \$650, \$700, \$750, \$800, \$850, \$900, \$950, \$1000) and When balance goes below (\$50, \$100, \$150, \$200, \$250, \$300, \$350, \$400, \$450, \$500, \$550, \$600, \$650, \$700, \$750, \$800, \$850, \$900, \$950, \$1000). Payment method (Credit/Debit Card, PayPal, Venmo, Apple Pay, Google Pay).
- Set Up Auto Reload**: Shows Auto Reload status at 'ON' and Average weekly cost at \$16.12. Options for Auto Reload amount (\$50, \$100, \$150, \$200, \$250, \$300, \$350, \$400, \$450, \$500, \$550, \$600, \$650, \$700, \$750, \$800, \$850, \$900, \$950, \$1000) and When balance goes below (\$50, \$100, \$150, \$200, \$250, \$300, \$350, \$400, \$450, \$500, \$550, \$600, \$650, \$700, \$750, \$800, \$850, \$900, \$950, \$1000). Payment method (Credit/Debit Card, PayPal, Venmo, Apple Pay, Google Pay).
- Review & Submit**: Shows Auto Reload amount, When balance goes below, and Payment method. A 'Submit' button is at the bottom.
- Thank you for setting up your Auto Reload**: Shows Confirmation number and Auto Reload settings. A 'View Details' button is at the bottom.
- My PrePay Funds**: Shows a balance of 124.79 and a 20-day estimated energy saving. A 'View Details' button is at the bottom.

## Enrollment Notification

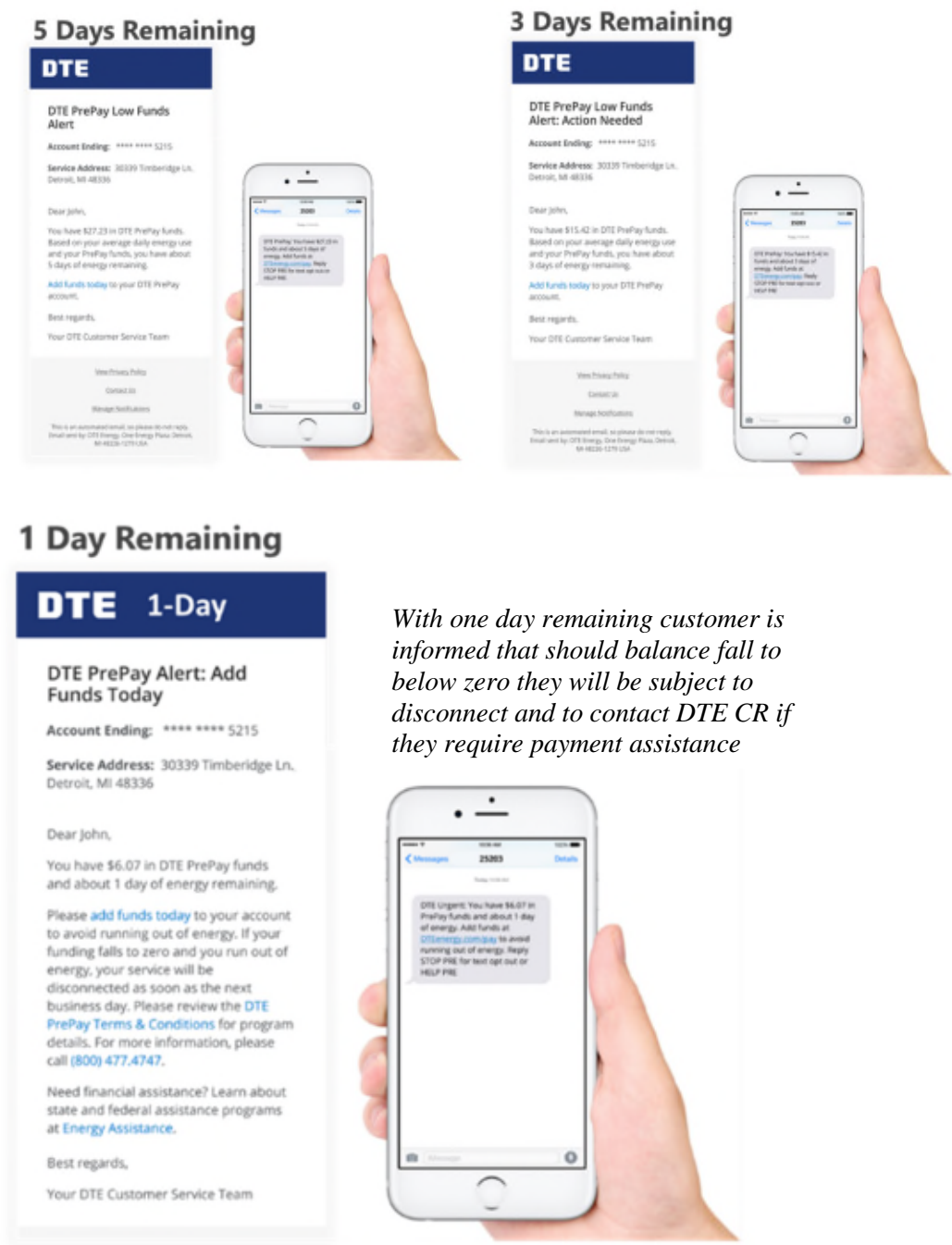


Customer receives confirmation of auto reload enrollment along with selected reload amounts and thresholds for reloading

Line  
No.

1

Figure 5 - Low Balance Alert Customer Experience



2

3

4



Line  
No.

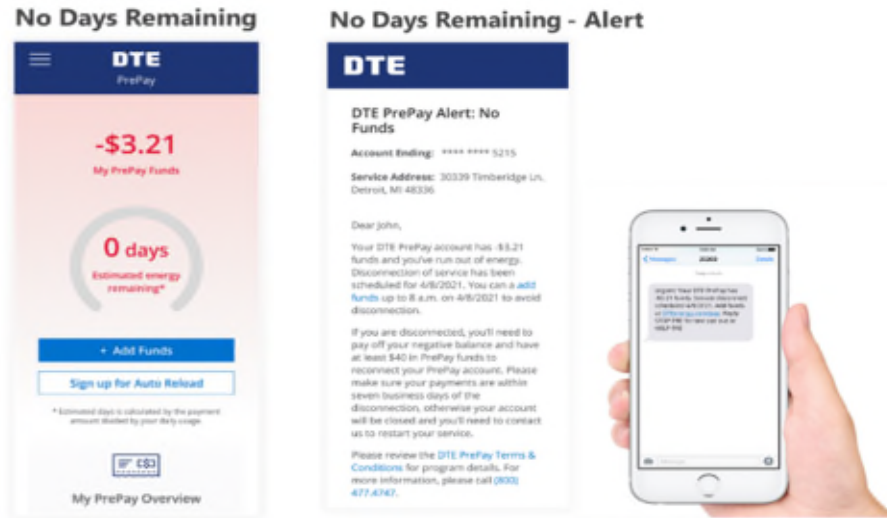
1           4. Disconnection/Reconnection

2           Upon reaching or falling below a zero credit balance, PrePay customers will be  
3           informed that they are scheduled for disconnect, along with the scheduled date of  
4           disconnect. By this time, a PrePay customer will have already received the  
5           previously described five, three, and one day low balance notifications described  
6           above, which provides them ample time to replenish the account prior to reaching  
7           a zero balance. For customers who reach a zero balance, disconnects will occur no  
8           sooner than the next business day, and the customer will be provided  
9           confirmation of the shutoff along with what's required to reconnect service.  
10          Disconnects will only occur Monday-Friday 8:00 a.m. until 6:00 p.m., will not  
11          occur on weekends or holidays, and will be deferred during storm and other extreme  
12          weather events.

13

14          Customers disconnected for non-payment can be reconnected by making a payment  
15          for any outstanding unpaid usage plus a minimum payment of \$40, which will be  
16          applied to their account as credit towards their future energy consumption.  
17          Customer reconnection requests will be submitted to their AMI meter in real-time,  
18          with an average processing and reconnection time of 30 minutes after payment is  
19          received. However, depending on the circumstances, reconnect may take up to four  
20          hours. After seven days, if the customer has not made payment to reconnect  
21          service, they will be notified that in order to reconnect they must contact a DTE  
22          CR, and after 30 days of nonpayment the customer's account will be permanently  
23          closed. Figure 6 provides a summary of what PrePay customers will experience  
24          when they reach a zero balance and when they are disconnected.

1

Figure 6 - Disconnect Customer Experience

2

**Disconnection Notification**

email	SMS
<b>DTE PrePay Disconnection Notification</b>	
<p>&lt;Service Address&gt; Account ending &lt;Last_4_ACCT&gt;</p> <p>Dear &lt;customer first name&gt;,</p> <p>You've run out of energy due to lack of funds. Your electric service was disconnected on &lt;disconnection_date&gt;.</p> <p>&lt;Add funds today (embedded &lt;Payment_link&gt;)&gt;.</p> <p>Service is usually restored within 30 minutes after a payment is processed, but could take up to 4 hours.</p> <p>Please note: If a payment is not made within seven business days, you'll need to contact us to restart your account and restore service. Restarting your PrePay account includes paying off past usage and funding the minimum account balance required to begin a PrePay account. For more information, please call 1.800.477.4747.</p> <p>Need help? Learn about assistance programs at &lt;URL to be determined&gt;. Additional language and reference to T&amp;C pending.</p> <p>Best regards,</p> <p>Your DTE Customer Service Team</p>	<p>DTE Urgent: Your electric service was disconnected on &lt;disconnection_date&gt;. Add funds at &lt;Payment_link&gt; to restore service. Reply STOP PRE for text opt out, or HELP PRE</p> <p>Characters: 159</p>

Line  
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1        5. Customer Feedback

2        The Company will develop and track standardized data to accurately measure the  
3        success of the PrePay program and to identify opportunities for improvement. Key  
4        performance indicators at a minimum will include: 1) customer segments enrolled;  
5        2) turnover and retention rates; 3) service disconnection/re-connection rates; 4)  
6        energy usage reductions for program participants; 5) arrears and bad debt expense  
7        reductions for program participants; and 6) customer satisfaction for program  
8        participants. The Company will collaborate with the MPSC staff to determine  
9        which program attributes and outcomes should be captured as part of the ongoing  
10       rollout of the program. Data captured will be used to continuously improve the  
11       program and the customer experience, informing the Company's decisions to  
12       change program features after program launch. The Company will consult with  
13       MPSC staff and other stakeholders as appropriate when such changes are deemed  
14       significant.

15

16       6. Unenroll

17       Customers enrolled in PrePay may unenroll from the voluntary program at any  
18       time. A customer who unenrolls from PrePay and elects to continue receiving  
19       energy from DTE will be returned to post-pay billing. Customers who choose to  
20       unenroll will not be penalized with additional fees, but will be responsible for the  
21       payment of any unpaid usage and past due balances, and will be subject to the same  
22       deposit rules as any other non-prepay customer.

23

24       **Q16. Will low-income customers continue to be able to access energy assistance?**

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No.

1 A16. Yes. Low-income customers who want to enroll in PrePay, and who are eligible  
2 for energy assistance, will be provided all of the support available from the  
3 Company and its agency partners to access and receive that assistance. The process  
4 for requesting and receiving assistance dollars will not change, with the dollars  
5 credited to the customer's PrePay account according to applicable agency rules and  
6 policies. In general, the dollars received will be used to pay down any past due  
7 balance, and when allowed by the agency providing the assistance, any remaining  
8 dollars will be applied to their PrePay credit balance to pay for future consumption.

9

10 **Q17. How many enrollments are you planning over the next five years and how will**  
11 **you market the program to customers?**

12 A17. The Company is targeting enrollment of 3,000 customers in the first full year of the  
13 implementation of **Phase 1** of the program, with the goal of enrolling up to 40,000  
14 customers over a 5-year period. The majority of these enrollments are expected to  
15 come through the extensive training of dedicated teams of CRs who are most likely  
16 to encounter customers who would benefit from enrollment in PrePay, but who are  
17 contacting the Company for other reasons. This includes CRs who primarily handle  
18 move-in/move-out requests (targeting renters and college students), high bill  
19 inquiries (targeting repeat billing callers), and collection calls (targeting customers  
20 with multiple failed payment plans and those who have been disconnected for non-  
21 payment). These CRs will be trained to identify which of these customers would  
22 benefit from enrollment in PrePay and will provide all of the information for the  
23 customer to make an informed decision about their voluntary enrollment in the  
24 program.

25

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1 Additional enrollments will come from those customers who call the dedicated  
2 PrePay phone number and inquire about the program because of information that  
3 they were provided on the website or information they received through targeted  
4 marketing campaigns. As previously stated, these calls will be handled by a  
5 dedicated and extensively trained team of CRs. Marketing campaigns, and the  
6 number of CRs trained to handle a PrePay enrollments or inquiries, will be  
7 expanded with **Phase 2** of the implementation, and will be scaled appropriately  
8 based on the pace of ongoing enrollments.

9

10 **Part 4. Billing Rule Waivers and Prepay Protections**

11 **Q18. Is the Company asking for any changes to the MPSC's Billing Practice Rules**  
12 **to implement Prepay?**

13 A18. Yes, the implementation of PrePay will require MPSC approval to waive several  
14 billing practice rules, which I've listed below.

15

16 **Rule 460.120 (3) Billing Frequency; method of delivery**

17 *(3) A bill shall be mailed, transmitted, or delivered to the customer not less than 21*  
18 *days before the due date. Failure to receive a bill properly mailed, transmitted, or*  
19 *delivered by the utility does not extend the due date.*

20

21 **Rule 460.129 (4)**

22 *(4) When a residential customer receives a past-due notice from the utility, the*  
23 *utility shall provide the customer access to information about energy assistance*  
24 *programs referenced in sub rules (1) and (3) of this rule, which shall, at minimum,*

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1       *include a telephone number of a utility representative able to provide this*  
2       *information.*

3

4       **Rule 460.139 (1)**

5       *(1) Not less than 10 days before the proposed shut off of service, pursuant to the*  
6       *provisions of R 460.140, R 460.142 and R 460.143 of these rules, a utility shall send*  
7       *a notice to the customer by first-class mail, or personal service.*

8

9       **Rule 460.139 (6)**

10       *(6) For an involuntary shutoff, at least 1 day before shutoff of service, the utility*  
11       *shall make not less than 2 attempts to contact the customer by telephone, if a*  
12       *telephone number is available to the utility, to advise the customer of the shutoff*  
13       *and what steps the customer must take to avoid shutoff. If the utility uses an*  
14       *automated notification system, it shall document the process for ensuring that at*  
15       *least 2 attempts are made to notify the customer of the pending shutoff. If the*  
16       *telephone number is not available, the customer has no telephone, or the utility*  
17       *chooses not to make telephone contacts, the utility shall either leave a notice at the*  
18       *premises advising the customer that service will be shutoff on or after the next*  
19       *business day or send notice by first-class mail postmarked at least 5 business days*  
20       *before shutoff of service is scheduled. The utility shall document all attempts to*  
21       *contact the customer. The 10-day notice sent under subsections (1) or (5) of this*  
22       *rule shall be considered as 1 attempt.*

23

24       **Rule 460.140(1)**

25       *(1) A notice of shutoff of service shall contain all of the following information:*

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1           (a) *The name and address of the customer, and the address at which service is*  
2           *provided, if different.*

3           (b) *A clear and concise statement of the reason for the proposed shutoff of service.*

4           (c) *The date on or after which the utility may shut off service, unless the customer*  
5           *takes appropriate action.*

6           (d) *That the residential and small nonresidential customer may have the right to*  
7           *enter into a payment plan with the utility for an amount owed to the utility that is*  
8           *not in dispute and that the customer is presently unable to pay in full.*

9           (e) *That the residential and small nonresidential customer may have the right to*  
10          *enter into a settlement agreement with the utility if the claim is for an amount that*  
11          *is in dispute.*

12          (f) *That the customer has the right to file a complaint disputing the claim of the*  
13          *utility before the proposed date of the shutoff of service.*

14          (g) *That the customer has the right to request a hearing before a hearing officer if*  
15          *the customer disputes the reasonableness of the payment plan or settlement*  
16          *agreement offered by the utility or if the complaint cannot be otherwise resolved*  
17          *and that the customer must pay to the utility that portion of the bill that is not in*  
18          *dispute within 10 business days of the date that the customer requests a hearing.*

19          (h) *That the customer has the right to represent himself or herself, to be*  
20          *represented by counsel, or to be assisted by other persons of his or her choice in*  
21          *the complaint process.*

22          (i) *That the utility will not shut off service pending the resolution of a complaint*  
23          *that is filed with the utility or the commission in accordance with these rules.*

24          (j) *The telephone number and address of the utility where the customer may make*  
25          *inquiry, enter into a payment plan or settlement agreement, or file a complaint.*

Line  
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1       (k) That the utility may require a deposit and restoration charge if the utility shuts  
2       off service for nonpayment of a delinquent account or for unauthorized use of utility  
3       service.

4

5       **Rule 460.140(2)**

6       (2) For residential customers a notice of shutoff of service shall also contain the  
7       following information:

8           (a) A combination utility shall include the following information on disconnection  
9       notices for eligible low-income customers whose natural gas and electric services  
10      are combined:

11           (i) The amounts for both natural gas and electric service, listed separately, and

12           (ii) That the customer has the option of choosing one of his/her services to retain  
13      with the appropriate payment, and

14           (iii) That the customer may have the option to enter into a payment plan for both  
15      natural gas and electric service, or to retain either natural gas or electric service  
16      as chosen by the customer.

17           (b) That the customer should contact a social services agency immediately if the  
18      customer believes he or she might be eligible for an energy assistance program or  
19      other emergency economic assistance and should inform the utility of any efforts  
20      being made to obtain payment assistance.

21           (c) That customers who believe they may be eligible for assistance from an  
22      energy assistance program should determine if assistance is available before  
23      enrolling in a payment plan because many agencies may not provide assistance if  
24      shutoff is avoided by signing a settlement agreement.



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1           (d) That during the heating season the utility will postpone shutoff of service if a  
2           customer is an eligible low-income customer that enters into a winter protection  
3           payment plan with the utility and the customer provides documentation that the  
4           customer is actively seeking emergency assistance from an energy assistance  
5           program.

6           (e) The energy assistance telephone line number at the department of human  
7           services or an operating 2-1-1 system telephone number.

8           (f) That the utility will postpone the shutoff of service if a certified medical  
9           emergency exists at the customer's residence and the customer informs and  
10          provides documentation to the utility of that medical emergency.

11          (g) That the customer should contact the utility for information about a shutoff  
12          protection program.

13

14          **Rule 460.143 (1)**

15          (1) For an involuntary shutoff of service using meters with remote shutoff and  
16          restoration capability, at least 1 day before shutoff of service, the utility shall make  
17          at least 2 attempts to contact the customer by 1 of the methods listed in R 460.139(6)  
18          of these rules. The notice shall conspicuously state that the disconnection of service  
19          will be done remotely and that a utility representative will not return to the premises  
20          before disconnection.

21

22          **Q19. How are customers on Prepay provided similar protections in the absence of**  
23          **the above MPSC billing rules?**

24          A19. In today's post-pay model, customers consume energy over a 26-35 day billing  
25          period, are charged for that usage by the Company, and are given 21-days to pay

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1           their bill. As highlighted in my testimony, many customers are surprised each  
2           month by how much energy they used and the dollar amount of their bill. The  
3           protections provided by the billing rules for which the Company is requesting  
4           waivers, are necessary in the post-pay model to help ensure customers are provided  
5           adequate opportunity to access funding, and if necessary enroll in a payment plan  
6           to avoid shutoff. While this process plays out, today's post-pay customers continue  
7           to consume energy, adding to both their past due balance and their current amount  
8           due. For some customers, this cycle continues, over and over again, and still  
9           ultimately results in the disconnection of service for nonpayment.

10

11           The prepay model flips the script, and gives customers who enroll in PrePay the  
12           opportunity to pay what they want, when they want, based on their financial  
13           situation and their energy needs. To assist customers, and to ensure they can  
14           successfully maintain a credit balance and avoid being disconnected, the Company  
15           will provide relevant information to the customer in the form of the previously  
16           described (see my response to Q15) daily balance updates, low balance alerts, and  
17           easy payment options, which includes notifications letting the customer know that  
18           they can contact DTE for assistance if necessary to avoid shutoff (as reflected in  
19           Figures 5 and 6).

20

21           Additionally, as described in the eligibility requirements in my response to Q15,  
22           the Company is excluding customers with a medical emergency at the premise,  
23           those with active military service, and any seniors on WPP. And while seniors who  
24           are not enrolled in WPP will be eligible to enroll in PrePay, the Company will not  
25           actively market the program to its senior customers. Also, as described, the

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1 Company is adhering to the same disconnect rules that are in place today for post-  
2 pay customers (i.e. no shutoffs on weekends, or holidays, or during extreme  
3 weather). And finally, as I indicated, PrePay is an *optional* program, customers can  
4 transition out of PrePay at any time with no penalty should they determine that the  
5 program is not providing them the benefits that they expected.

6

7 **Q20. Will Prepay customers pay what they pay today for a kWh of electricity?**

8 A20. Yes. The rate that a customer will pay under the PrePay program will be the same  
9 as the rate they pay under post-pay billing, and includes the impact of the D1 step  
10 rate and a daily proration of all current fixed monthly charges. However, instead  
11 of generating a monthly bill based on the customer's total usage during the billing  
12 cycle, the system will calculate the amount of energy used, and the cost of that  
13 energy, on a daily basis for deduction from the customer's PrePay balance.

14

15 Included below are additional details on how the billing engine will calculate a  
16 customer's total daily energy charges (the charges below are rounded, the actual  
17 base rates currently billed were approved in Case No. U-20561; the rates for PrePay  
18 billing will reflect the actual D1 base charges and active surcharges at any given  
19 time).

20

21 1. System remotely captures daily electric AMI meter reads

22 2. Each day the Prepay billing simulator calculates the following:

23

- Daily usage (kWh)

24

- Daily capacity charges on first 17 kWh of daily usage (\$0.045/kWh)

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- 1           • Daily capacity charges on each incremental kWh of usage above 17kWh
- 2           (\$0.065/kWh)
- 3           • Non-capacity energy charges on total daily kWh usage (\$0.042/kWh)
- 4           • Other volumetric charges (e.g. distribution, PSCR and any other active
- 5           surcharges) on total daily kWh usage (\$0.075/kWh)
- 6           • A prorated daily charge for fixed monthly charges (e.g. monthly delivery
- 7           charge)

8           3. The above calculated daily charges are added up and sales tax is applied

9           4. The total amount, with sales tax, is deducted from the customers Prepay

10          balance, and the system estimates the number of days of usage remaining

11

12          While PrePay customers will not be provided a monthly bill in the manner in which

13          they are today, customers will be provided notification that a monthly summary of

14          their account activity is ready for review, along with a link to that summary, which

15          for a PrePay customer with arrears, will include the information reflected in Figure

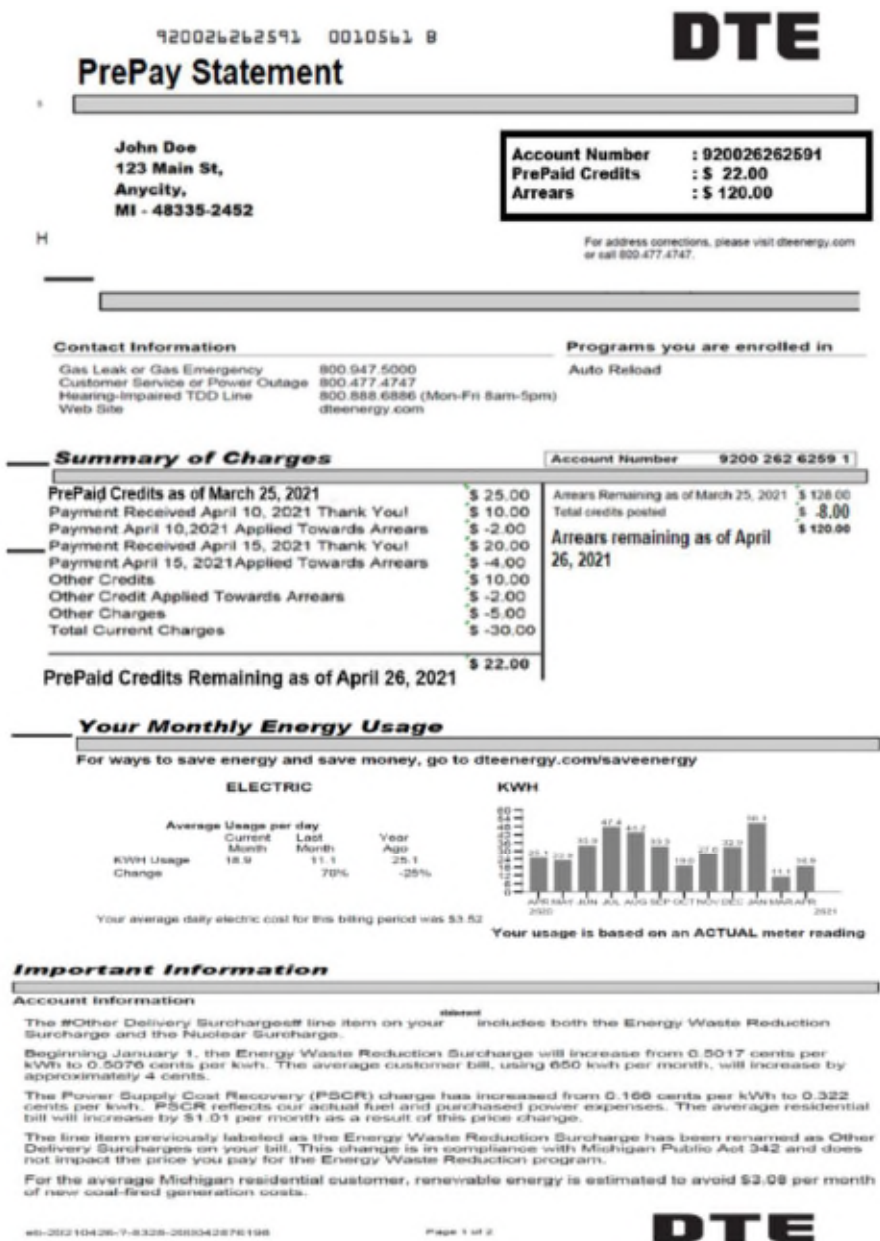
16          7 on the final page of my testimony.

17

Line  
No.

1

Figure 7 - Prepay Monthly Account Activity Statement



- 2 Q21. Does this complete your direct testimony?
- 3 A21. Yes, it does.

## Customer Segment: Young and Tech Savvy



**Persona:** *Environmentally Conscience Millennial*



### Exhibit A-1 DTE PrePay Customer Journeys

	Enrollment	Account Management
Customer Experience	<p> <b>Customer:</b> "Hi. I'm calling about a new program I heard about called PrePay."</p> <p><i>CR determines customer is eligible, has profile that would find PrePay valuable.</i></p> <p><b>CR:</b> "You're eligible for PrePay. Would like to hear more about it?"</p> <p><b>Customer:</b> "Sure."</p> <p><i>CR provides a description of the PrePay program &amp; how it works</i></p> <p><b>Customer:</b> "Sounds interesting. Will it help me reduce my usage, because I'm trying to find ways to reduce my carbon footprint?"</p> <p><i>CR provides a description of the PrePay program value proposition (see below)</i></p>	<p><i>As requested, Customer begins receiving daily SMS (text) balance updates from DTE.</i></p> <p> <b>Customer:</b> "Wow, in just a few days I've already spent quite a bit on my electricity, I better click this link to my account and see how much I've been using?"</p> <p> <b>Customer:</b> "Boy I've used a lot of energy in the last 5-days, I'm going to increase the temperature on my AC unit and make sure I turn off lights in the rooms I'm not using"</p> <p><i>Customer receives their first 5-day low balance SMS alert.</i></p> <p><b>Customer:</b> "Only 5-days of usage remaining, when I get a chance, I better make a payment"</p> <p><i>Customer receives their first 3-day low balance SMS alert.</i></p> <p> <b>Customer:</b> "Oh that's right I've got to make a payment"</p> <p><i>Customer clicks on the payment link to their account and adds credits via credit card.</i></p>
	<p> <b>Customer:</b> "Sounds like it would help me manage my energy usage more effectively. Please enroll me."</p> <p><i>CR advises customer of T&amp;Cs, enrolls them into program, takes initial payment and configures payment and communication preferences per their direction.</i></p>	<p> <b>Customer:</b> "Well, I'm going out of town for the week, the AC will be off and I'm only leaving the exterior motion sensing lights on, so I should be good at least until I come back"</p> <p><i>Customer receives notification that their first monthly summary is ready to view.</i></p> <p> <b>Customer:</b> "Wow, I managed to use less electricity than last month, and it cost me less....good for me and good for the environment."</p>
Value Proposition	<p>PrePay will provide an additional option for these technologically savvy customers, who are more prone to actively monitor and manage their usage, and who are more engaged in how much energy they are using due to their interest in reducing their carbon footprint.</p>	









## Customer Segment: Financially Stable Saver



**Persona:** Budget Conscience Gen Xer



### Exhibit A-1 DTE PrePay Customer Journeys

	Enrollment	Account Management
Customer Experience	<p> <b>Customer:</b> “Hi. I’m calling about my bill, I think it’s higher than it should be, this can’t be right.”</p> <p> <b>CR:</b> “I can check that for you. Looks like your meter reading is correct and your bill is the same as it was at this time last year”.</p> <p> <b>Customer:</b> “I still don’t think it’s right and I’m tired of having to call you to explain my bill to me.”</p> <p><b>CR:</b> “Are you aware of a new program we are offering customers called PrePay that allows you to monitor your usage daily and control when you pay”.</p> <p> <b>Customer:</b> “No, can you explain it to me?”</p> <p><i>CR provides a description of the PrePay program &amp; how it works and the value proposition (see below).</i></p> <p> <b>Customer:</b> “Sounds like it would help me manage my energy usage more effectively. Please enroll me.”</p> <p> <i>CR advises customer of T&amp;Cs, enrolls them into program, take initial payment and configures autopayment and communication preferences per their direction</i></p>	<p><i>As requested, Customer receives daily SMS (text) message from DTE with PrePay credit balance</i></p> <p><b>Customer:</b> “So that’s how much energy I use every day. No wonder my monthly bill was so high! I need to find out how to use less energy.”</p> <p><i>Customer gets information on <a href="http://www.dteenergy.com">www.dteenergy.com</a> about energy efficiency, signs up for energy efficiency newsletters, requests free programmable thermostat, etc.</i></p> <p><b>Customer:</b> “I feel like I have some ideas to reduce the amount of energy I’m using, and it’s nice being able to easily check daily on the website.”</p> <p><i>Customer receives 5-day Low Balance SMS message from DTE with PrePay credit balance.</i></p> <p><b>Customer:</b> “Only 5-days of usage remaining, I better make a payment”</p> <p><i>Customer clicks on the payment link to their account and adds credits via credit card.</i></p> <p><i>Customer receives second 5-day Low Balance SMS message from DTE with PrePay credit balance.</i></p> <p> <b>Customer:</b> “Hey it’s been a while since my last low balance alert, looks like I’m using less energy every day and with only a few days left in the month, it looks like I’m spending less.”</p> <p><i>Customer receives notification that their first monthly summary is ready to view.</i></p> <p> <b>Customer:</b> “Wow, I managed to use less electricity than last month, and I’ve been able to have insight into what it’s been costing me....so glad I don’t have to call DTE this month”.</p>
Value Proposition	Customers who repeatedly question the usage shown on their bill, or who are often surprised by the amount of their bill, could benefit from enrollment in a PrePay option because it would simplify their billing experience, put them in control of the energy they use and how much they spend each month, and eliminate monthly high bill surprises.	

## Customer Segment: Renters and College Students



### *Persona: Young Renter Finding her Way*



### Exhibit A-1 DTE PrePay Customer Journeys

	Enrollment	Account Management
Customer Experience	<p>🤔 <b>Customer:</b> “Hi, I’m moving out of my parents house and into a rental house and I was told to call DTE to start electric service”</p> <p>🤔 <b>CR:</b> “I can help you with that. I can sign you up for traditional service or our new PrePay program, which is popular with renters”.</p> <p><b>Customer:</b> “What’s the difference?”</p> <p><b>CR:</b> “Well with traditional service you are charged for the electricity you used in the last month and then you have 21-days to pay your bill, but with PrePay, you pay in advance for what you think you will need in an amount that works for you – like putting gas in your car, or a prepaid phone”.</p> <p>🤔 <b>Customer:</b> “Interesting. I’m actually a little concerned about having to pay utility bills every month since right now I’m in grad school and waitressing, so some weeks I make more money than others”.</p> <p><b>CR:</b> “PrePay would be a great option for you, I can get you started with just a \$40 payment, which will be used for your future electricity use and you can pay as little as \$10 at a time, and we will notify you when your running low”.</p> <p>😊 <b>Customer:</b> “Please enroll me in PrePay, I think it would be better for me to be able to pay smaller weekly amounts that work for me”.</p> <p><i>CR advises customer of T&amp;Cs, enrolls them into program, take initial payment and configures autopayment and communication preferences per their direction.</i></p>	<p><i>As requested, Customer receives daily SMS (text) messages from DTE with PrePay credit balance.</i></p> <p>🤔 <b>Customer:</b> “Ok, I still got quite a few days of credits left. I’ll have to think about when I’m going to make a payment before they’re gone”</p> <p><i>Customer receives 5-day Low Balance SMS message from DTE with PrePay credit balance.</i></p> <p><b>Customer:</b> “Only five days of usage left, I’ll have to make a payment in the next couple of days”.</p> <p><i>Customer receives 3-day Low Balance SMS message from DTE with PrePay credit balance.</i></p> <p>🤔 <b>Customer:</b> “Oh yeah, I almost forgot I need to make that payment, I’m going to put a bit extra in since I picked up a couple extra shifts at work and did really well with my tips”.</p> <p><i>Customer makes a payment on the DTE Mobile App using a debit card.</i></p> <p>🤔 <b>Customer:</b> “Making a payment was easy, and it looks like I’m going to need to spend about \$25 per week to maintain a healthy credit balance. Maybe I should sign up for this Auto Reload option”.</p> <p><i>Customer enrolls in auto reload and selects to add \$25 every time their account only has 3 days of estimated usage remaining.</i></p> <p><i>Customer receives notification that first auto reload payment has been received.</i></p> <p>😊 <b>Customer:</b> “That’s great, now I can pay weekly and don’t need to think about it, and if I ever want to add more money to the account if I have a good week at work, I can”.</p>
Value Proposition	PrePay is an attractive alternative to customers who want to start service easily, and who don’t struggle financially, but who might have inconsistent income streams and want to pay smaller, more frequent amounts to allow them to align their costs with their income.	



## Customer Segment: Payment Challenged and Vulnerable



**Persona:** *Moderate Income Suburban Couple*



**Exhibit A-1**  
DTE PrePay  
Customer Journeys

	Enrollment	Account Management
Customer Experience	<p> <b>Customer:</b> “Hi, we’ve been struggling to pay bills lately because one of us lost our job, and our electric service has been shutoff. We can’t afford this bill but need our service reconnected”.</p> <p> <b>CR:</b> “I’m sorry to hear that you’re struggling financially, I’ve been in that situation and know how hard it can be. Unfortunately, you’re not eligible for a payment plan, so to restore you will have to pay the balance due and a deposit”</p> <p> <b>Customer:</b> “We cannot afford that....we need help?”</p> <p><b>CR:</b> “Well, we are offering a new program called PrePay that could work for you. Would you like to hear more?”</p> <p><b>Customer:</b> “Sure.”</p> <p><i>CR provides a description of the PrePay program &amp; how it works and the value proposition for the customer.</i></p> <p><b>Customer:</b> “So no deposit and I can get reconnected? But what about my past due balance?”</p> <p> <b>CR:</b> “You can roll that into your PrePay account and 20% of every credit payment you make goes towards that balance”</p> <p> <b>Customer:</b> “Sounds like it would allow me to pay off my past due balances over time. Please enroll me.”</p> <p><i>CR advises customer of T&amp;Cs, enrolls them into program, take initial payment and configures autopayment and communication preferences per their direction.</i></p>	<p><i>As requested, Customer receives daily SMS (text) messages from DTE with PrePay credit balance.</i></p> <p> <b>Customer:</b> “Ok, we’ve still got quite a few days of credits left. We’ll have to think about when I’m going to make a payment before they’re gone.”</p> <p><i>Customer receives 5-day Low Balance SMS message from DTE with PrePay credit balance.</i></p> <p> <b>Customer:</b> “Wow our initial credits were used up quickly. We should call to make sure we understand how to avoid running out of credits?”</p> <p><i>Customer calls DTE Energy PrePay Specialist Team.</i></p> <p><b>Customer:</b> “Hi. We are on PrePay and we need help with how much of a payment to make to keep my energy on.”</p> <p><b>CR:</b> “Looks like you’re using about \$3 of energy a day. If you make a payment of \$30 you could have enough energy for about a week if you conserve a little, you can find energy efficiency options at <a href="http://www.dteenergy.com">www.dteenergy.com</a>. I can also schedule a home energy consultation for you. Remember that 80% of this payment will go toward your energy and 20% will go towards your arrears. And you can check your account daily to see what you’re using and how your payments are being applied to your account.”</p> <p> <b>Customer:</b> “Yes, we can make a \$30 payment. And please schedule the home consultation. Thank you for helping us!”</p> <p><i>Customer receives second 5-day Low Balance SMS message from DTE with PrePay credit balance.</i></p> <p> <b>Customer:</b> “OK, so we are back down to 5-days, I’m just going to click on the link to make a payment and put in another \$30, and with the ideas we got from the home consultation we can start to lower our costs”.</p> <p><i>Customer receives notification that their first monthly summary is ready to view.</i></p> <p> <b>Customer:</b> “Wow, I managed to use less electricity than I usually do, I’ve spent less, and I’ve managed to keep my service on.....this is working well for me”.</p>
Value Proposition	PrePay will be another tool for the Company and its Customer Representatives (CRs) to assist these customers for whom traditional billing and payment plans don’t work, allowing this segment of customers to take more control and responsibility for the energy they use, to decide when and how much they pay based on their needs and anticipated usage patterns, to easily pay down any past due balances, to avoid shutoff, and to avoid the stress that comes with receiving a monthly bill that they cannot afford.	

## **DTE PREPAY PROGRAM TERMS and CONDITIONS**

### **1. PROGRAM ELIGIBILITY**

Electric only customers on the D1 residential rate with an automated electric meter (AMI meter) that is configured for remote disconnect and reconnect capabilities are eligible for enrollment in the PrePay program. The customer's meters must have sufficiently reliable communication with the AMI infrastructure, as determined by the Company, to be eligible for enrollment.

A Prospective PrePay customer cannot be on life support nor have an active medical emergency at the premise, cannot be on active military duty, cannot be a senior enrolled in the Winter Protection Program (WPP), cannot be enrolled in any other DTE billing & payment programs, cannot be enrolled in any Michigan Green Power (MIGP) programs, the Home Protection Plan (HPP) program, or the TreeGuard Assurance program.

With the exception of customers on life support, with an active medical emergency, or on active military duty, all other prospective customers who wish to enroll in the PrePay program will have to voluntarily unenroll from any of the other programs described above.

### **2. ENROLLMENT**

#### ***Existing Customers***

Any existing customers who meet the eligibility requirements may convert to DTE PrePay. To start prepaid service, a minimum initial credit of \$40.00 must be made on the DTE PrePay program account within 1 calendar day of enrollment.

Customers with a past due balance on their existing account will have the option to either pay off the past due balance plus any current charges on the account, or to transfer up to \$750 in past due balances and current charges to their PrePay account. If the customer chooses to transfer outstanding balances to their PrePay account, they will be enrolled in the PrePay Deferred Payment Plan (DPP) option, which will apply 20% of each future prepayment made by the customer to the outstanding balance, with the remaining 80% applied as credits to their PrePay account. If the amount owed by the customer is greater than \$750, funds must be paid to bring the amount to the maximum cap amount.

#### ***New Customers***

Any new customers who meet the eligibility requirements may enroll in DTE PrePay. To start PrePay service, new customers will need to provide a photo ID and proof of residency. Like existing customers, to start service a minimum initial credit of \$40.00 must be made on the DTE PrePay program account within 1 calendar day of enrollment.

All prepaid customers will comply with and be bound by DTE Terms and Conditions of Retail Electric Service. All charges and fees, such as returned check fees, meter tampering fees, etc. apply to prepaid accounts. Service will not be connected if electrical code is not met.

### ***Security Deposit and Late Fees***

The normal security deposit for a residential account is not required and no late fees are applied to prepaid accounts. Any credit deposit on an existing customer account will be transferred and applied to their new DTE PrePay account at the time of enrollment. The credit deposit will first be used to pay down any outstanding balance and current charges, with the remainder applied to the customers' PrePay account as a credit towards future consumption.

## **3. ACCOUNT MONITORING AND MANAGEMENT**

### ***Payment Methods and Locations***

A minimum of \$10 must be applied to the account with each credit payment, with customers able to make up to 10 payments per day. Payments can be made 24 hours a day using a savings account, checking account, credit or debit card, at [dteenergy.com](http://dteenergy.com), via the DTE Mobile App, or in the automated phone system by calling 877-477-4747. Additionally cash, check, credit and debit card payments can be made 24 hours a day at any DTE Kiosk location.

While payments made at an Authorized Pay Agent (APA) and through the U.S. mail will be accepted, customers are discouraged from making payments through an APA or through the mail due to delays between when the payment is received and when the customer has exhausted all of their prepay credits, which could result in a disconnection of service.

In the event of a payment to a PrePay account being returned from the financial institution due to insufficient funds, the amount of the original payment will be deducted from the customer's account balance along with any applicable returned payment fees. If this causes the credit on the account to be exhausted, service will be subject to disconnection. Proper notification will be sent to the customer to inform them of the deduction and the impact on their PrePay account balance.

DTE Energy has the right to decline payments by check if the account reflects two or more return items in the last 12 months.

### ***Bill Viewing and Bill Calculation***

All DTE PrePay accounts will be calculated daily, with daily adjustments of all charges and fees deducted from the prepaid credit balance. Customers will not receive a monthly bill statement, but will be able to view a monthly reconciliation of all account activity at [dteenergy.com](http://dteenergy.com).

Customers have sole responsibility for viewing and accessing their account information and account balance, which will be available 24 hours/day, 7 days/week at [dteenergy.com](http://dteenergy.com) and through the automated phone system at 877-477-4747.

### ***Communications and Balance Alerts***

Customers are required to provide a valid email at the time of enrollment, which will serve as the primary means of receiving balance alerts and other PrePay program notifications. Customers will also be provided at the time of enrollment the ability to opt-in to SMS/text alerts as well, or can do so at any time after enrollment by logging into their PrePay account at [dteenergy.com/My Profile and Preferences](http://dteenergy.com/My Profile and Preferences).

In compliance with the Terms and Conditions of the mobile carrier, the customer must opt-in to receive text messages. An opt-in code will be sent via text message to all customers electing to receive notifications through text message. When choosing SMS/text as a communications method, the customer will be responsible for all SMS/text messaging charges.

DTE will communicate to customers when the credit balance on file is approaching \$0.00, with all customers notified by default at 5 days, 3 days, 1 day and No days of energy use remaining. The notification will include an estimate of the number of days of electric service remaining on the account (based on average use) and the dollar amount remaining on the account. Customers will also have the option to receive weekly and/or daily notifications of their credit balance, which they can select at any time by logging into their PrePay account at [dteenergy.com/My Profile and Preferences](http://dteenergy.com/My Profile and Preferences).

It is the customer's responsibility to ensure that their communication method(s) of choice can receive the notifications being sent by DTE, and the customer must ensure that all phone numbers and e-mail addresses are up-to-date and accurate.

#### **4. DISCONNECTION OF SERVICE**

##### ***Disconnection of Service***

A prepaid account will be subject to service disconnection no sooner than the day after the account reaches a zero balance, with disconnects occurring Monday-Friday from 8:00 am until 6:00 pm. No service disconnections will be scheduled on weekends, holidays, or during extreme weather events.

Customer understands and agrees that in lieu of receiving a shutoff notice via USPS mail, and two live agent calls the day before the scheduled shutoff, they will receive an email, and optionally an SMS/text notification, that will include the date of the pending disconnect, the payment required to reconnect service, and a contact number for a DTE PrePay customer representative that they can call for assistance.

If an account is disconnected for nonpayment for 7 consecutive days, the account will be considered inactive and the customer will need to contact a DTE representative to reconnect service. After 30 days without payment, the customer understands that their PrePay account will be closed and that they will receive notification along with relevant contact information.

##### ***Reconnection of Service***

It is possible that a customer's service will continue after the account has reached a zero balance but before disconnection. Such service is known as "Unpaid Usage", and includes charges for the electricity consumed and the accumulated and prorated fixed daily charges.

The customer agrees that if service that has been disconnected due to a credit deficit, the account will remain disconnected until any unpaid usage and a minimum credit balance of \$40 is paid. The amount to pay can be found at [dteenergy.com](http://dteenergy.com), or by calling DTE's IVR, and will be clearly communicated in the notification sent to the customer.

When a payment is made and confirmed, and the credit applied brings the account to a minimum of a \$40 positive balance, the service will be reconnected. Restoration of the electric service will usually occur within 30 minutes and nearly always within 4 hours unless factors outside of the Company's control prevent reconnection. The Company will send a notification when the customer's service is reconnected.

The customer accepts all responsibility for the safety of the premise by ensuring that major equipment/appliances (i.e. loads) such as ovens, cook tops, water heaters, HVAC systems, etc. are turned off before making their payment to get connected.

***Assistance Agency Funding***

Upon receipt of a pledge from an approved agency on behalf of a DTE PrePay customer, the pledge is applied to the account just as it is for post-pay customers. The account is noted that funds from a pledge are forthcoming. When the pledge funds arrive, the funds are applied to the customer's account.

Depending on the source of the agency assistance and the applicable rules regarding that assistance, the customer understands that the dollars received will first be used to pay off a customer's past due balance and any unpaid usage on the account, and if allowed, any remaining dollars will be applied to the customer's account as a credit towards future consumption.

The account will be recalculated with the credit from the agency. If the account at that time is in an inactive status, a DTE customer representative will review the account and determine if the pledge is enough to pay the account in full and reactive the account. If the funds are not enough to have the service reconnected, additional funds from the customer will be required.

***Voluntary Termination of Service***

Upon a voluntary termination of service by the customer, the customer will receive a refund of any remaining credit on the account after all final bill amounts have been calculated. All refund checks will be sent to the mailing address on file. A customer may elect to convert their account to a post pay account at any time. DTE will require full payment of a deposit and balance owed, if applicable, as a condition of continued service.

## DTE PrePay: Frequently Asked Questions (FAQs)

### How does DTE PrePay work?

Unlike today's traditional post-pay billing, in which you consume energy over a monthly period and receive a monthly bill for what you consumed, you fund your PrePay account ahead of time based on how much energy you anticipate you will use, paying what you want, when you want, which is very similar to putting gas in your car.

With PrePay you can easily track your energy usage, just like you do with the fuel gage in your car, and you can decide when it's time to add funds to your account. To keep you informed, we will send you notifications alerting you as to how many days of estimated usage you have left so that you can replenish the account before you exhaust your credits (i.e. before the tank is empty and you run out of gas).

With DTE PrePay you can:

- ✓ Make payments on a schedule best suited for **your energy needs and your budget**
- ✓ **Set up email and text notifications** to keep you informed on your daily funds, estimated energy remaining and more
- ✓ Use Auto Reload to **automatically add funds** to your account and avoid running out of energy

### Is it easy to enroll in PrePay?

Yes it's really easy. You can sign up over the phone by calling 877-XXX-XXXX and talking to a DTE PrePay customer representative. If you're a new customer, all that's required is a picture ID and proof of residency, such as a phone bill. PrePay representatives are available to assist you Monday - Friday from 8:00 a.m. – 6:00 p.m., and Saturday from 8:00 a.m. - 2:00 p.m.

### Do I have to sign a contract?

PrePay customers are NOT required to sign a contract to participate in the program. You can switch back to a post-pay plan anytime you want without penalty. You will however be required to pay a deposit (if applicable) and any outstanding balances on the account.

### How do I know if I'm eligible for PrePay?

Any DTE Electric residential customer, excluding customers with both DTE Electric and DTE Gas service, with an electric automated meter (AMI meter) is eligible for PrePay, with some other exceptions, which are outlined in the DTE PrePay program [Terms and Conditions](#).

### Can I enroll in PrePay if I'm already on a Payment Plan or Budget Wise Billing?

No. If you are enrolled in a Payment Plan or Budget Wise Billing you would have to unenroll from these plans to enroll in DTE PrePay.

### **Will I be required to pay a deposit or an account activation fee?**

With DTE PrePay there are no deposits required and no account activation fees. Customers however will need to make a payment sufficient enough to provide an initial credit balance of \$40 on the account. Customers with a deposit on their existing account, will have that deposit applied as a credit to their PrePay account.

### **How will I know if PrePay account balance is running low?**

You can check your account balance 24 hours/day, 7 days/week at [dteenergy.com](http://dteenergy.com) and through the automated phone system at 877-477-4747, but we will keep you informed through email and optional SMS/text messages when your PrePay balance falls below a specified number of days remaining until your account reaches a zero balance.

### **How do I make payments on my PrePay account?**

You can make payments in the same convenient way that you make them today, by credit card, debit card, cash, or check using one of our automated payment systems or by talking to a customer representative. While you can still pay through an Authorized Pay Agent (APA) or by U.S. mail, it is not a recommended method of payment for a PrePay customers due to the delay between when the payment is made and when it is posted to your PrePay account, which could lead to your balance falling below zero. A complete list of ways to pay can be found at [dteenergy.com/Billing & Payment/Ways to Pay](http://dteenergy.com/Billing%20&%20Payment/Ways%20to%20Pay).

### **How does Automatic Reload work?**

By enrolling in the Automatic Reload, you are authorizing DTE Energy to debit your credit/debit card or bank account each time your balance drops below the amount you choose. You must make sure that sufficient funds are available to complete each Automatic Reload or you may be charged a return item fee. If your financial institution rejects a transaction for any reason, your payment will not be applied to your DTE Energy account. You can discontinue use of Automatic Reload at any time by signing into your account at [dteenergy.com](http://dteenergy.com) or calling Customer Service at 800.477.4747.

### **What happens if my PrePay balance reaches zero?**

When your PrePay account balance falls below zero, the account will be eligible for disconnect. You will be notified of the date of the pending disconnect and provided all of the information required to replenish the account to avoid disconnect. You will be reconnected upon receipt of a payment sufficient enough to bring the account back to a \$40 credit balance. You can find more information on PrePay disconnect and reconnect policies in the program [Terms and Conditions](#).

### **How do I set up and select PrePay notifications?**

All customers will receive mandatory low balance email alerts at 5-days, 3-days, 1-day and zero days of estimated usage remaining. However, customers can sign up for optional text messaging and daily or weekly balance alerts at the My Profile & Preferences page in the menu on your My PrePay page or in the main navigation of [dteenergy.com](http://dteenergy.com). If you select text as a notification channel, message and data rates may apply; messaging frequency varies; and carriers are not liable for delayed or undelivered messages.

### **I've fallen behind and have a past due balance, can I still enroll in PrePay?**

Yes, PrePay offers a Deferred Payment Plan option to customers with past due balances. Customers are able to transfer up to \$750 in past due balances to their PrePay account. Under this Deferred Payment Plan, 20 percent of each payment you make will be applied to reduce your past due balance, and 80 percent will be added to your PrePay account for future power use.

For example, when you add \$20 to your PrePay account:

\$16 applies to your PrePay funds for energy

\$4 applies to your Deferred Payment Plan

Each time funds are added to your PrePay account, the amount directed to your Deferred Payment Plan is noted and your remaining Deferred Payment Plan balance is updated. That makes it easy for you to see how you're progressing toward paying off a past-due balance.

### **Will I be able to apply agency assistance dollars to my PrePay account?**

Yes, agency assistance funding can be received in the same manner as it is today, and depending on the source of the assistance will be used to pay down all of your past due balance and any unpaid usage, with any remaining dollars potentially applied to your PrePay credit balance to pay for future consumption. We can help you access available assistance funding and make sure it gets applied to your PrePay account in the appropriate manner.



**STATE OF MICHIGAN**  
**BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

In the matter of the application of **DTE Electric** )  
**Company** for the approval of a partial waiver of )  
the Consumer Standards and Billing Practices for )  
Electric Residential Service and approval of a )  
Voluntary Prepay Billing Program.)

Case No. U-21087

**PROOF OF SERVICE**

ESTELLA R. BRANSON states that on September 29, 2021, she served a copy of the DTE Electric Company's Application and Direct Testimony and Exhibits of Witness, Michael J. Hatsios in the above captioned matter, via electronic mail upon the persons listed on the attached service list.

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ESTELLA R. BRANSON

**MPSC Case No. U-21087**  
**SERVICE LIST**

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