

# Energy Affordability & Accessibility Collaborative

August 18, 2021

# AGENDA

10:00 am 10 min	Welcome/Goals Review
	<b>Anne Armstrong</b> , MPSC
10:15 am 15 min	Guiding Values Outreach and Education Update
	<b>Briana Parker</b> , Elevate <b>Briana DuBose</b> , EcoWorks
10:25 am 25 min	Energy Affordability and Accessibility: A Commissioner's Perspective Q&A
	<b>Tremaine Phillips</b> , MPSC Commissioner
10:50 am 5 min	BREAK
10:55 am 40 min	Regulatory Approaches to Energy Affordability
	<b>Moderator: Al Freeman</b> , MPSC <b>Joe Magee</b> , PA PUC <b>Gabe Dusenbery</b> , CO PUC <b>Kurt Cooper</b> , Indiana Michigan Power

11:35 am 10 min	Community Issues Discussion Participants raise current issues facing communities
	<b>All</b>
11:45 am 5 min	Affordability, Alignment and Accessibility Subcommittee Update
	<b>Tanya Paslawski</b> , 5 Lakes Energy <b>Amy Bandyk</b> , CUB <b>Jamie Curtis &amp; Elaina Braunschweig</b> , MPSC
11:50 am 5 min	Definitions Subcommittee Update Energy Affordability Standard Discussion
	<b>Anne Armstrong</b> , MPSC <b>Mary Wilkins</b> , Salvation Army
11:55 am 5 min	Next Steps
	<b>Anne Armstrong</b> , MPSC

# EAAC CHARGE

To implement the Commission recommendations from the [February 18, 2021 U-20757](#) order and to file the first interim report to the docket on 12/17/2021.

## Commission Priorities:

- Ongoing COVID-19 response
- Recommend approaches for simplifying the energy assistance and customer protection systems, working with the EWR low-income workgroup
- Explore a common definition of energy affordability and energy security with the goal of reducing the number of households in Michigan with unsustainable energy burdens
- Emphasize the importance of data collection, transparency, and analysis to inform program design and policy changes
- Review rule-based protections
- Communication and engagement

# TWO CONCURRENT PRIORITIES

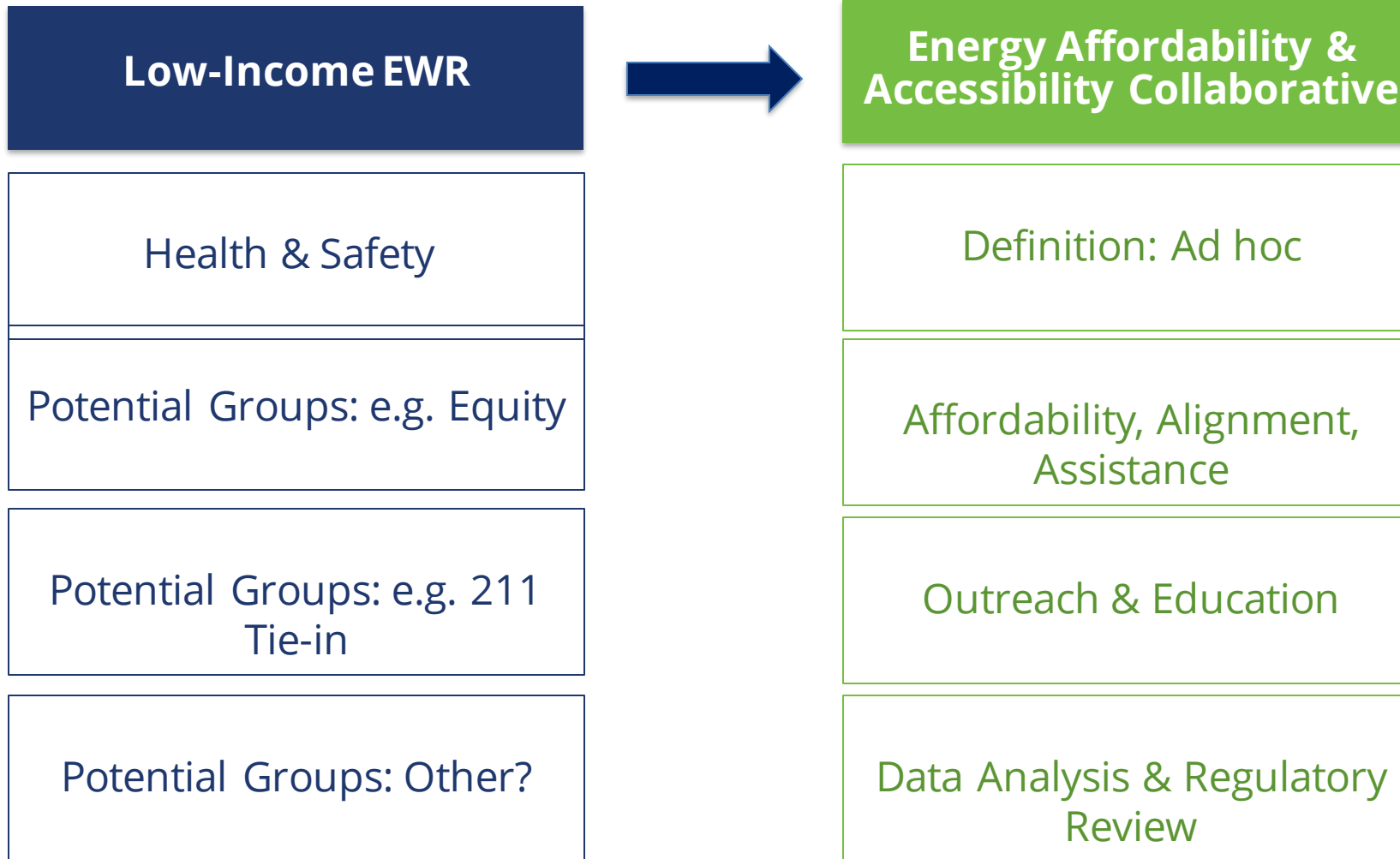
- **COVID-19 Response**

- ✓ Outreach and education
- ✓ Program and policy revision to meet immediate needs and reduce immediate barriers

- **System Analysis and Recommendations for Long Term Reform**

- ✓ Sustainable affordability
- ✓ Establish process for high energy burden/low-income communities to influence policy development
- ✓ Expand and Increase ease of access to services
- ✓ Collection of data for protection, safety and equity

# EAAC STRUCTURE



# STRUCTURE

## Energy Affordability & Accessibility Collaborative

### Definitions Ad hoc

Leaders: Anne Armstrong, Mary Wilkins

- ✓ Recommend standard for energy affordability, includes energy self-sufficiency

### Affordability, Alignment, Assistance

Co-chairs; Amy Bandyk, Elaina Braunschweig, Jamie Curtis, Tanya Paslawski

- ✓ 360° look at energy affordability: streamlining energy assistance; next generation affordable payment plans; collections processes, integration with EWR, weatherization, & rate design

### Outreach & Education

Leaders: Anne Armstrong, Reka Holley, Briana DuBose, Briana Parker

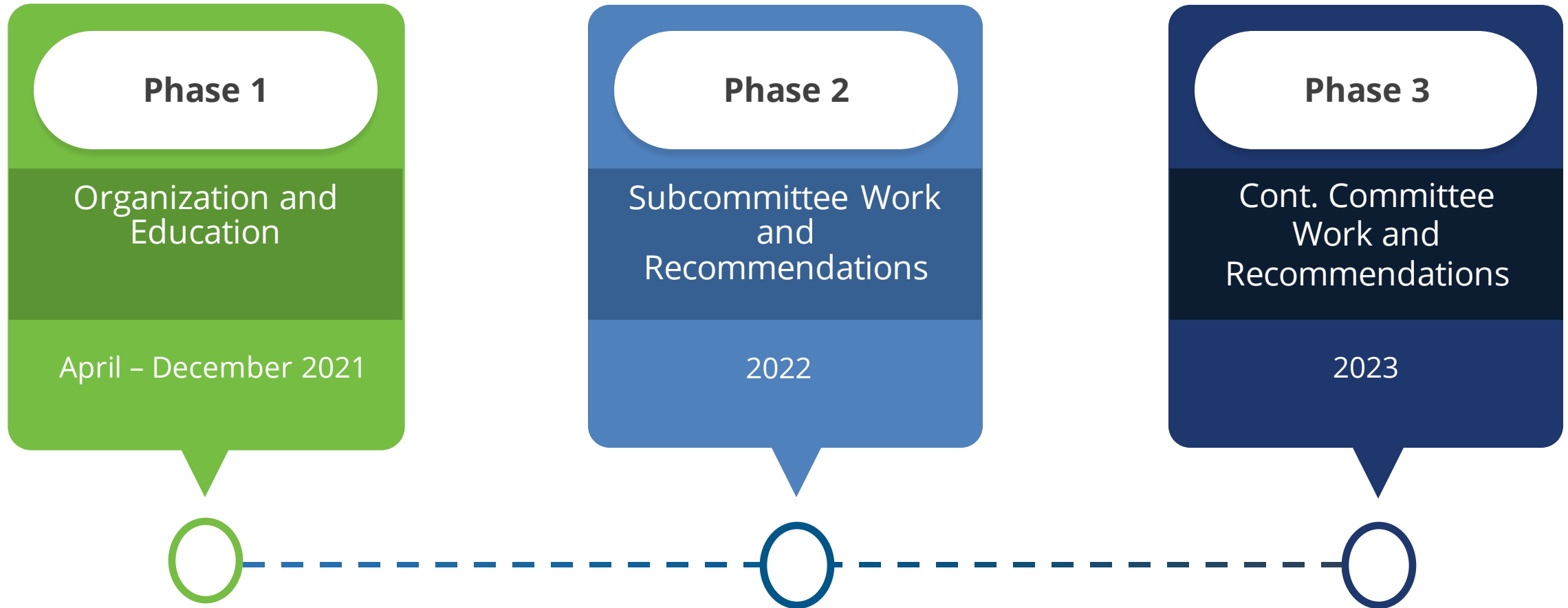
- ✓ Expand participation by geography and low-income/high energy burden households
- ✓ Develop a strategy for outreach on federal COVID-19 energy assistance

### Data Analysis & Regulatory Review

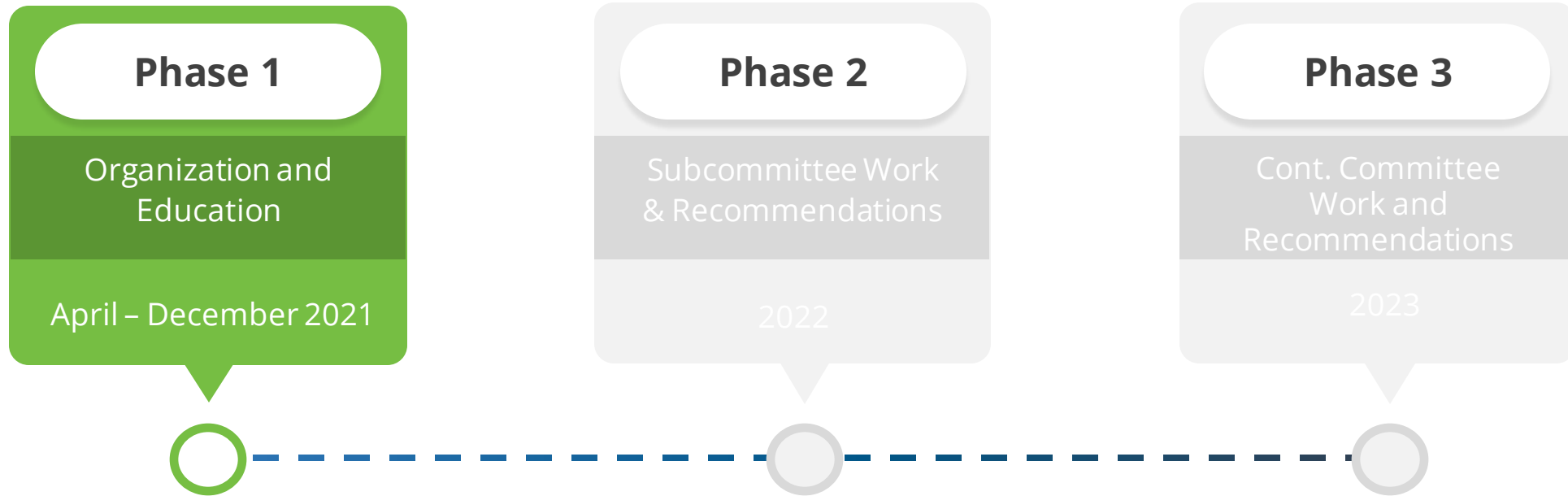
Leaders: Chris Forist, Stakeholder

- ✓ Analyze current data submissions and develop long-term data strategy
- ✓ Review rule-based customer protections and make recommendations for improvement

# TIMELINE



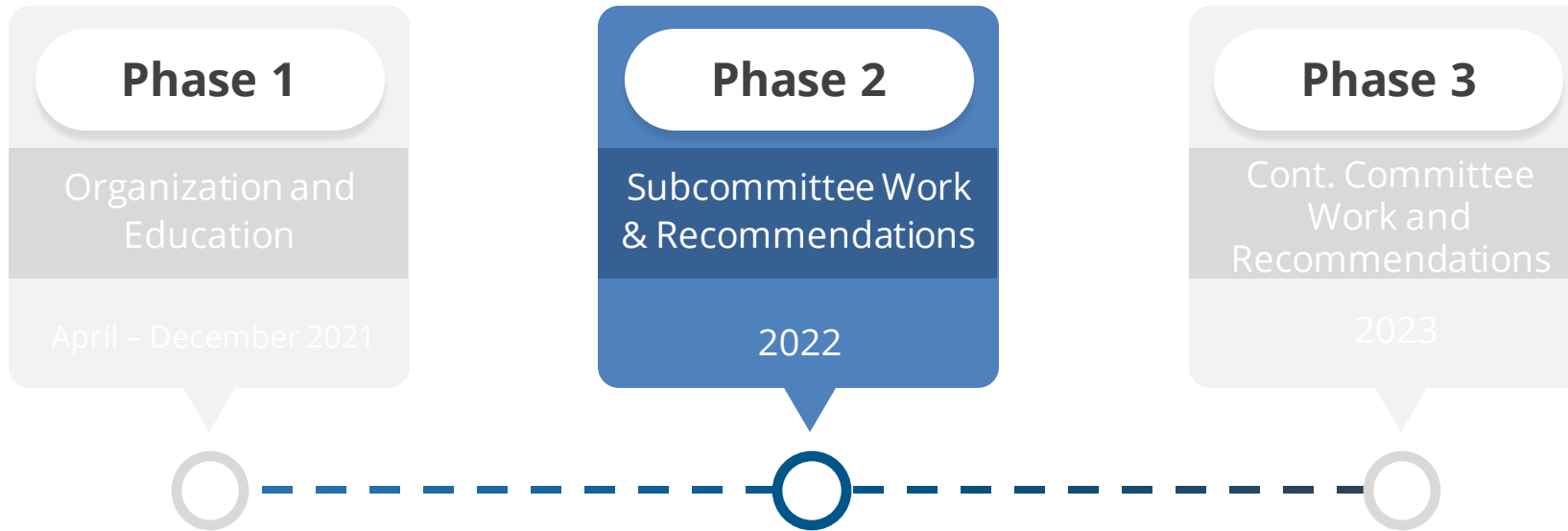
# TIMELINE



- ✓ Set up the Collaborative with input from Low-Income EWR on structure
- ✓ Establish subcommittees with MPSC and Stakeholder co-leaders of each subcommittees
- ✓ Begin subcommittee work, develop workplans
- ✓ At monthly EAAC meetings provide education on approaches to affordability from different states and utilities, including state of Michigan perspective
- ✓ Progress report due on 12/17



# TIMELINE



- ✓ Subcommittees dive into workplans, bring information, education to the EAAC
- ✓ Establish Data/Regulatory Analysis Subcommittee
- ✓ EAAC meetings to continue with subject matter experts on topics recommended by subcommittees
- ✓ Subcommittees bring work, proposals, and debate to EAAC
- ✓ Proposed report in December

# TIMELINE



- ✓ To be determined by Collaborative Stakeholders
- ✓ Recommendation could include on-going work of the EAAC and the Subcommittees

# 2021 TIMELINE

		PHASE 1	PHASE 2	PHASE 3
APR	Establish collaborative; overview of order and charge, values and principles; coordination with LI-EWR; overview of approaches to energy affordability			
MAY	Establish guiding principles, overview of Commission authority, duties and processes; review and discussion of EAAC priorities EAAC structure and subcommittees			
JUN	Guiding values – review at every meeting; energy efficiency definition presentation; national, state, agency, and advocacy perspectives on customer issues with affordability; discuss subcommittee structure			
JUL	Overview of Public Shutoff/Arrearage Data Site; overview of MI energy assistance and credit programs; national perspectives on state approaches to affordability; outreach and Education subcommittee presentation			

# 2021 TIMELINE

		PHASE 1	PHASE 2	PHASE 3
AUG	Address by Commissioner Phillips; regulatory approaches to affordability; subcommittee updates; community concerns.			
SEPT	In depth review and Q&A on energy assistance in MI with COVID assistance updates; <i>group work on what's working, what's not, what's ideal</i> ; community concerns; subcommittee updates			
OCT	<i>Proposed: Tying EWR and Energy Assistance</i>			
NOV	<i>Proposed: Review of accomplishments to date; 2022 planning; overview of Data and Regulatory Analysis subcommittee overview and planning</i>			

# FIRST YEAR DELIVERABLES: 12-17-21 PROGRESS REPORT

- Establish consensus values for conducting meetings, communications, and outputs
- Demonstrate outreach to and participation of impacted and under-represented groups
- Demonstrate on-going COVID-19 response including program adjustments; outreach & education efforts
- Demonstrate progress on a recommendation for a definition of energy affordability
- Demonstrate coordination between Low Income EWR workgroup, EAAC, utilities and MPSC
- Recommend structure for tying EWR programs to energy assistance programs

# GOALS FOR THIS MEETING

- Understand the Commission's broad approach to affordability
- Insight into other state regulatory commissions' approaches to affordability; sample of a rate approach to affordability
- Listen to the community
- Learn from subcommittee work

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	<b>Anne Armstrong</b> , MPSC



# MPSC EAAC Guiding Values Segment

**Tanya Paslawski**  
**Senior Consultant**



# Agenda

- **EAAC Guiding Values**
- **Introduction to Guiding Value:** Enhance Environmental Justice
- **Let's Work together!** Define & How can we enhance environmental justice?
- **How do we implement?**
- **Follow up & Next Steps:**

# MPSC EAAC Guiding Values

1. Advance racial and economic justice
2. Enhance environmental justice
3. Active listening and communication
4. Operate with integrity
5. Ensure inclusion
6. Practice accountability
7. Encourage collaboration
8. Follow leadership from impacted individuals and communities
9. Education and awareness
10. Promote transparency

# Guiding Value: Enhance Environmental Justice

- **What is environmental justice?**

- Environmental justice is the fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.
- Fair treatment means that no population bears a disproportionate share of negative environmental consequences resulting from industrial, municipal, and commercial operations or from the execution of federal, state, and local laws; regulations; and policies.
- Meaningful involvement requires effective access to decision makers for all, and the ability in all communities to make informed decisions and take positive actions to produce environmental justice for themselves.

# Let's Work Together

- How can we enhance environmental justice communities in practice?

# Follow up Next Steps

- Please add comments to: EAAC Guiding Values
- Next Guiding Value: Active Listening & Communication

# Energy Affordability and Accessibility: A Commissioner's Perspective

Tremaine Phillips, MPSC Commissioner



# Break

- 5 minutes

# Regulatory Approaches to Energy Affordability

Moderator: Al Freeman - MPSC

Panelists:

Joe Magee – PA PUC

Gabe Dusenbury– CO PUC

Kurt Cooper– Indiana Michigan Power



# Pennsylvania Public Utility Commission

Joe Magee  
Energy Policy Manager – Bureau of Consumer Services



August 18, 2021

# PA Universal Service Programs

**Required by PA law** –Universal Service programs must be available and appropriately funded in each utility distribution territory. PA PUC must ensure that the utilities run the programs in a cost-effective manner. 66 Pa. C.S. § [2203\(8\)](#) and § [2804\(9\)](#).

**All major electric and natural gas companies must offer them** - Electric Distribution Companies (EDCs) with more than 60,000 customers and Natural Gas Distribution Companies (NGDCs) with more than 100,000 residential customers must submit Universal Service plans to the PA PUC. 52 Pa. Code § [54.77](#) and § [62.7](#).



# Universal Service Programs

- **Customer Assistance Program (CAP)** – Reduced bills and/or debt forgiveness.
- **Low Income Usage Reduction Program (LIURP)** – Weatherization services and energy education.
- **Customer Assistance and Referral Evaluation Services (CARES)** – Social service and referral services. May include company credit.
- **Hardship Fund** – Cash grants to pay utility debt and/or restore/maintain service.

Except for hardship funds grants, universal costs are funded primarily through residential ratepayer surcharges.



# CAP Policy Statement

## 52 Pa. Code §§ 69.261-267

- Provides guidelines on how CAPs should be designed and implemented.
- Identifies several different payment plan options, but also allowed companies to develop their own, with Commission approval.

# CAP Recommended Maximum Energy Burdens

Utility Service	0-50% Poverty	51-100% Poverty	101-150% Poverty
Electric Non-Heat	2%	4%	4%
Gas Heat	4%	6%	6%
Electric Heat	6%	10%	10%



# Additional Resources

## Energy Affordability Study

<http://www.puc.pa.gov/pcdocs/1602386.pdf>

## Review of Universal Service and Energy Conservation Programs

<http://www.puc.pa.gov/pcdocs/1559325.pdf>

## Utility Assistance Programs

<https://www.puc.pa.gov/about-the-puc/consumer-education/utility-assistance-programs/>

[www.puc.pa.gov](http://www.puc.pa.gov)



# Questions?



**Joe Magee**  
**Energy Policy Manager**  
**PA PUC – Bureau of Consumer Services**

**717-772-1204**  
**[jmagee@pa.gov](mailto:jmagee@pa.gov)**

# Colorado LI/IQ Programs

August 18, 2021

**Gabe Dusenbury**

**Section Head, Rate Financial Analysts**

**Colorado PUC**



# Definitions of Affordability

- Affordability and Energy Burden
- No set energy burden in statute, just income guidelines
- Commission Rules do follow the principle of no more than 6% of household income on energy burden (30% spending on housing, 20% of housing spending on energy)
  - If electric heating, 4-6% on electric bill (nat gas loophole)
  - If not electric heating, 2-3% on each

# Commission Programs

- Percentage of Income Payment Programs (since 2016)
- Each jurisdictional utility runs its own programs, eligibility comes through the LEAP application (Apr-Nov)
- PIPP credits based on the prior 11-13 months' worth of billing
- Each utility has its own funding levels and uses them for its own ratepayers, increases/decreases must be approved through Commission (50% balance +/- automatic trigger)

# Triennial Review

- 2016 Rules called for triennial review beginning in 2019
- Colorado Energy Office more directly ran the study and procurement
- Led to Commissioners' Information Meeting on Recommendations

# Recent Legislation

- House Bill 21-1105 (Energy System Benefit charge for Energy Outreach Colorado and Energy Office Weatherization Assistance Program)- 50 cents rising to 75 and then inflation-adjusted. These entities have their own definitions. Also expanded PIPP to 185% FPL/60% SMI
- Senate bill 21-272: Expanded definition of disproportionately impacted communities: possible low income impacts but also other proceedings (e.g. Renewable Energy Standard, Resource Planning), enhanced notice provisions

# Other LI activity

- Beyond PIPP, low income rates are permitted by statute but no jurisdictional utility has one
- Individual municipalities, rural co-ops may run their own program (outside PUC jurisdiction)
- LEAP/LIHEAP interaction at working group meetings, cooperative relationship
- Efficiency programs (DSM)- each utility runs its own, subject to a set of cost-benefit tests and related bonuses for uptake and meeting goals

# Pending Rulemakings

- Proceeding No. 21R-0326EG ( <https://www.dora.state.co.us/pls/efi/EFI.homepage> )
- SB 272 rulemaking to come
- Existing low-income/income qualified (e.g. community solar gardens) which may give rise to a holistic review as part of SB 272 process or otherwise
  
- Questions or concerns: [gabe.dusenbury@state.co.us](mailto:gabe.dusenbury@state.co.us)



An **AEP** Company

BOUNDLESS ENERGY<sup>SM</sup>

# Senior Citizen Tariff Tariff RS - SC



An **AEP** Company

BOUNDLESS ENERGY<sup>SM</sup>

## Senior Tariff Information

- ❖ This is an optional offering to Michigan seniors
- ❖ Originally approved by MPSC in 2010
- ❖ Designed for seniors with average or less usage levels
- ❖ Must be 65 years of age or older and head of household
- ❖ Must take Standard Service from I&M
- ❖ Can not be combined with I&M Low-Income Provision
- ❖ Standard “stay” of 12 month required
- ❖ Currently Subscribed at 2,413 Customers
- ❖ Can be used with legacy storage water heater program
- ❖ Current outreach efforts underway



# Rate Design – Senior Savings

<u>Monthly kWh</u>	<u>Standard RS Tariff</u>	<u>Senior Citizen Tariff</u>	<u>Savings under Senior Tariff</u>
100	21.77	10.58	11.18
200	36.28	17.54	18.75
300	50.80	24.49	26.31
400	65.32	38.87	26.44
500	79.84	53.26	26.58
600	94.35	67.64	26.71
700	108.87	82.03	26.84
800	123.39	96.41	26.97
900	137.90	110.80	27.10
1000	152.42	152.42	0.00
1100	166.94	194.04	(27.10)
1200	181.45	235.66	(54.21)

	<u>kWh</u>	<u>RS</u>	<u>RS-SC</u>
First	300	0.14517	0.06953
Next	600	0.14517	0.14385
Over	900	0.14517	0.41621
Service charge		7.25	3.63

\* Rates shown reflect charges of Base Rates only and do not include Riders or Surcharges

# Rate Design – Break Even Point

I&M MI RS, RS-SC Base Rate Bill Comparison  
Rates as of Jan-21, 2021 in Case No. U-20900





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# Community Issues Discussion: How States Approach Energy Affordability

All

Participants raise current  
issues facing communities

# Affordability, Alignment and Accessibility Subcommittee Update

Tanya Paslawski – 5 Lakes Energy

Amy Bandyk – CUB

Jamie Curtis – MPSC

Elaina Braunschweig - MPSC

# Definitions Subcommittee Update Energy Affordability Standard Discussion

Anne Armstrong - MPSC

Mary Wilkins – Salvation Army

# NEXT STEPS

- EAAC Meetings are the 3rd Wednesday of the month.
- Next Meeting: September 15, 2021, 10:00 a.m. to 12:00 p.m.
  - ✓ In depth presentations and discussion on energy assistance in Michigan.
  - ✓ Community Concerns
  - ✓ Subcommittee updates
- Please consider participating in a subcommittee. Sign up through this link:
  - ✓ [EAAC Subgroup Sign-up Survey \(surveymonkey.com\)](https://www.surveymonkey.com)
  - ✓ [EAAC Website](#)

# Thank You for Participating

Anne Armstrong – [armstronga3@michigan.gov](mailto:armstronga3@michigan.gov)





# Appendix

# Indiana Michigan Brochure

## Flexible Payment Options MICHIGAN



Indiana Michigan Power understands these uncertain times can be very difficult. We want to help our customers who are worried about today's economic conditions. If you need help with your energy bill, we have a variety of payment options that can help.

### ► Senior Citizen Discount Rate

Save up to \$27 a month\* on your energy bill! The Senior Citizen Discount Rate is designed for Michigan customers, age 65 or older that use less than 900 kWh of energy a month.

The senior rate gives you a 50% discount on your monthly service charge, plus a reduced rate on energy use under 900 kWh. If you use more than 900 kWh a month, the senior rate may not be the most affordable option for you.

Monthly Energy Use	Senior Citizen Rate Monthly Bill <small>(taxes &amp; fees not included)</small>	Standard Rate Monthly Bill <small>(taxes &amp; fees not included)</small>	Monthly Difference
300 kWh	\$24	\$51	Save \$27
600 kWh	\$68	\$94	Save \$26
900 kWh	\$111	\$138	Save \$27
1,000 kWh	\$152	\$152	\$0 saved
1,200 kWh	\$236	\$181	\$55 more owed

\*Totals rounded

#### Rules/Requirements:

- Must be a Michigan residential customer age 65 years or older.
- Discounted rate applies to primary address only.
- Must remain on the rate for at least 12 months.
- Late fees can still be assessed.

\* A 65-year-old customer using 900 kWh a month, calculated on base rates only

### ► Low-Income Customer Service Charge Waiver

Get the \$7.25 monthly residential service charge waived, saving \$87 a year!

#### Rules/Requirements:

- Must be a Michigan residential customer.
- Household income can not exceed 150% of the Federal Poverty Level.
- You received any of the following assistance within the last six months:
  - State Emergency Relief Program
  - Food Stamps or SNAP
  - Medicaid
- Must re-qualify annually

In addition to these two Michigan-only programs, there are other payment plans and payment assistance programs that can help.

# Indiana Michigan Power Tariff Sheet for Senior Rates

**M.P.S.C. 17 - ELECTRIC  
INDIANA MICHIGAN POWER COMPANY  
STATE OF MICHIGAN  
(RATE CASE U-20359)**

**ORIGINAL SHEET NO. D-15.00**

**TARIFF RS-SC  
(Optional Residential Senior Citizen)**

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Availability of Service

Available to qualified customers desiring service for residential uses which include only those purposes, which are usual in individual private family dwellings or separately metered apartments and in the usual appurtenant buildings served through the residential meter who take Standard Service from the Company. This rate is not available for commercial or industrial service, for resale purposes, or for alternate residence. To qualify for this rate, the customer must be 65 years of age and head of the household.

The optional rate is not available for an alternate or seasonal home and the customer shall contract to remain on this rate for at least 12 months.

Monthly Rate (Tariff Codes 023)

	Power Supply		Delivery	Total
	Capacity	Non-Capacity		
Service Charge (\$)	--	--	3.63	3.63
Energy Charge (¢ per kWh):				
For the first 300 kWh used per month	0.762	2.689	3.502	6.953
For the next 600 kWh used per month	2.696	8.185	3.504	14.385
For all kWh over 900 used per month	13.438	24.673	3.510	41.621

Minimum Charge

This tariff is subject to a minimum monthly charge equal to the monthly service charge and all applicable riders.

Storage Water-Heating Provision

This provision is closed except for the present installation of current customers receiving service hereunder at premises served prior to May 1, 1997.

If the customer installs a Company-approved storage water-heating system that consumes electrical energy only during off-peak hours as specified by the Company and stores hot water for use during on-peak hours, the following shall apply:

# I&M Tariff Sheet for Senior Rates, Cont...

**M.P.S.C. 17 - ELECTRIC  
INDIANA MICHIGAN POWER COMPANY  
STATE OF MICHIGAN  
(RATE CASE U-20359)**

**ORIGINAL SHEET NO. D-16.00**

**TARIFF RS-SC  
(Optional Residential Senior Citizen)**

(Continued From Sheet No. D-15.00)

Tariff Code

- 024 For Minimum Capacity of 80 gallons, the last 300 kWh of use in any month shall be billed at the Storage Water-Heating Energy Charge.
- 025 For Minimum Capacity of 100 gallons, the last 400 kWh of use in any month shall be billed at the Storage Water-Heating Energy Charge.
- 026 (c) For Minimum Capacity of 120 gallons or greater, the last 500 kWh of use in any month shall be billed at the Storage Water-Heating Energy Charge.

Storage Water-Heating Energy Charge (¢ per kWh)	Power Supply		Delivery	Total
	Capacity	Non-Capacity		
	0.762	2.689	3.140	6.591

These provisions, however, shall in no event apply to the first 200 kWh used in any month, which shall be billed in accordance with the "Monthly Rate" as set forth above.

For purposes of this provision, the on-peak billing period is defined as 7 a.m. to 9 p.m., local time, for all weekdays, Monday through Friday. The off-peak billing period is defined as all other hours in the week.

The Company reserves the right to inspect at all reasonable times the storage water-heating system and devices which qualify the residence for service under the Storage Water-Heating Provision, and to ascertain by any reasonable means that the time-differentiated load characteristics of such devices meet the Company's specifications. If the Company finds that in its sole judgement the availability conditions of this tariff are being violated, it may discontinue billing the customer under this provision and commence billing under the standard monthly rate.

This provision is subject to the Service Charge as stated in the above monthly rate and all applicable riders.

Load Management Water-Heating Provision (Tariff Code 027)

This provision is closed except for the present installations of current customers receiving service at premises served prior to January 1, 2002.

(Continued on Sheet No. D-17.00)

**ISSUED FEBRUARY 10, 2020  
BY TOBY L. THOMAS  
PRESIDENT  
FORT WAYNE, INDIANA**

**EFFECTIVE FOR SERVICE RENDERED ON  
AND AFTER FEBRUARY 1, 2020**

**ISSUED UNDER AUTHORITY OF THE  
MICHIGAN PUBLIC SERVICE COMMISSION  
DATED JANUARY 23, 2020  
IN CASE NO. U-20359**

# I&M Tariff Sheet for Senior Rates, Cont...

**M.P.S.C. 17 - ELECTRIC  
INDIANA MICHIGAN POWER COMPANY  
STATE OF MICHIGAN  
(RATE CASE U-20359)**

**ORIGINAL SHEET NO. D-17.00**

**TARIFF RS-SC  
(Optional Residential Senior Citizen)**

(Continued From Sheet No. D-16.00)

For residential customers who install a Company-approved load management water-heating system, which consumes electrical energy primarily during off-peak hours specified by the Company and stores hot water for use during on-peak hours, of minimum capacity of 80 gallons, the last 250 kWh of use in any month shall be billed at the Load Management Water-Heating Energy Charge.

	Power Supply Capacity	Non-Capacity	Delivery	Total
Load Management Water-Heating Energy Charge (¢ per kWh)	0.762	2.689	3.140	6.591

This provision, however, shall in no event apply to the first 200 kWh used in any month, which shall be billed in accordance with the "Monthly Rate" as set forth above.

For the purpose of this provision, the on-peak billing period is defined as 7 a.m. to 9 p.m., local time, for all weekdays, Monday through Friday. The off-peak billing period is defined as all other hours in the week.

The Company reserves the right to inspect at all reasonable times the load management water-heating system(s) and devices which qualify the residence for service under the Load Management Water-Heating Provision. If the Company finds that in its sole judgement the availability conditions of this provision are being violated, it may discontinue billing the customer under this provision and commence billing under the standard monthly rate.

This provision is subject to the Service Charge as stated in the above monthly rate and all applicable riders.

Delayed Payment Charge

A delayed payment charge of 2% of the unpaid balance shall be added to any delinquent bill as set forth in Rule 460-122 of the MPSC rules. The due date shall be 21 days following the date of transmittal.

Applicable Riders

Monthly charges computed under this tariff shall be adjusted in accordance with the applicable Commission-approved rider(s) listed on Sheet No. D-114.00.

(Continued on Sheet No. D-18.00)

**ISSUED FEBRUARY 10, 2020  
BY TOBY L. THOMAS  
PRESIDENT  
FORT WAYNE, INDIANA**

**EFFECTIVE FOR SERVICE RENDERED ON  
AND AFTER FEBRUARY 1, 2020**

**ISSUED UNDER AUTHORITY OF THE  
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DATED JANUARY 23, 2020  
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# I&M Tariff Sheet for Senior Rates, Cont...

**M.P.S.C. 17 - ELECTRIC  
INDIANA MICHIGAN POWER COMPANY  
STATE OF MICHIGAN  
(RATE CASE U-20359)**

**ORIGINAL SHEET NO. D-18.00**

**TARIFF RS-SC  
(Optional Residential Senior Citizen)**

(Continued From Sheet No. D-17.00)

Term of Contract

Contracts under this tariff will be made for a minimum of 12 months.

Special Terms And Conditions

This tariff is subject to the Company's Terms and Conditions of Standard Service.

This tariff is available for single-phase service only. Where three-phase power service is required and/or where motors or heating equipment are used for commercial or industrial purposes, the applicable power tariff will apply to such power service.

Customers with cogeneration and/or small power production facilities shall take service under Rider NMS-1 (Net Metering Service for Customers With Generating Facilities of 20 kW or Less, Rider NMS-2 (Net Metering Service for Customers with Generating Facilities Greater than 20 kW), Tariff COGEN/SPP or by special agreement with the Company.

**ISSUED FEBRUARY 10, 2020  
BY TOBY L. THOMAS  
PRESIDENT  
FORT WAYNE, INDIANA**

**EFFECTIVE FOR SERVICE RENDERED ON  
AND AFTER FEBRUARY 1, 2020**

**ISSUED UNDER AUTHORITY OF THE  
MICHIGAN PUBLIC SERVICE COMMISSION  
DATED JANUARY 23, 2020  
IN CASE NO. U-20359**

# QUESTIONS FOR THE EAAC

- What does the Commission and its partners need to do to help customers get access to customer assistance, especially additional assistance available from COVID-19?
- How does the Commission ensure that high energy burden and vulnerable communities are represented in policy development?
- What is the best approach/approaches for customers to sustainably afford their energy bills?
  - Including effectively layering energy waste reduction and energy assistance
- What policies or regulatory mechanisms can be used to minimize shutoffs and help customers stay out of crisis?
- What data should the Commission collect to track customer safety and understand inequities in energy burden and reliability?