

Comments from MECA

November 23, 2020

To: Tayler Becker, Electric Operations Section, Michigan Public Service Commission
Brian Sheldon, Energy Security Section, Michigan Public Service Commission

Re: Comments on the Staff Report: Grid Security and Reliability Standards for Electric Service Rules

The Michigan Electric Cooperative Association (MECA¹) submits these comments on the Michigan Public Service Commission (MPSC) Staff's Report: Technical Standards for Electric Service Rules U-20630 issued November 10, 2020. MECA appreciates this opportunity to comment on Staff's summary, and recommendations to update the Technical Standards for Electric Service Rules. MECA appreciates the time and effort by interested stakeholders to provide valuable input during this process and the Commission's efforts to facilitate discussion by hosting workshops and subgroup meetings to ensure collaborative input and participation. MECA offers the following comments on Staff's initial report draft language.

Comments to Rule Changes Concerning Definitions Rule 102

The definitions, Rule 102(i) in particular, contain a new definition for Major Interruption. This definition does not align with the definitions in the Service Quality Rules. MECA believes that both set of rules should follow the IEEE 1366 Reliability Standard Major Event day definition as that is what all of the current systems are built around and what all of the industry bench marking and reporting is already based on. A new and different standard could result in confusion among the industry as government officials, regulatory bodies, consumers, utility personal attempt to compare different reliability numbers. A consistent standard offers the optimal platform to basis of comparison between utilities.

Comments to Rule Changes Concerning Reporting in Rule 203

Rule 203(g) contains reporting requirements for cooperatives that are greater than those for investor-owned utilities. As proposed, Cooperatives would be required to report monthly within 50 days after the close of the month. Investor-

¹ MECA is a Michigan non-profit corporation that serves as the statewide association for Michigan's Co-ops, one generation and transmission cooperative, and one alternative electric supplier, which combined, provide electricity to more than 650,000 Michigan residents in 58 Michigan counties.

owned utilities would, in contrast, be reporting with 50 days of the quarter. An increased burden on Cooperatives appears to be unnecessary or the intent may be that investor-owned utilities report monthly also.

Rule 203(i) proposes to establish line clearing reporting for utilities with more than 100,000 customers. Elsewhere in the draft rules the line between large and small utilities uses 1,000,000 customers. MECA recommends that the 1,000,000 customer measure be the determining factor in regard to reporting under Rule 203(i).

Comments to Rule Changes & Staff Recommendations

Rule 411 Extension of Electric Service

MECA does not see value to all customers in changing this existing rule set and supports leaving Rule 411 unchanged.

Staff's proposal to require a collaborative meeting among a customer desiring to switch utilities and two affected utilities raises several concerns: i) that the scope of the meeting (sub rule f) should be expressly limited to only the switching question, ii) that customers may develop a false sense that a switch based on rate differences can be justified, iii) that meetings are to take place without Staff involvement and iv) that compelling a meeting will involve utilities devoting additional resources to meetings that instead, could be accomplished by clear written communications among the parties at much lower cost and time involved.

Comments to Changes to Line Clearance Program (Rule 505) – amended customer notifications and post-trim inspection requirements

MECA's distribution cooperatives effectively communicate with their customer/members through use of magazine publications that are mailed to customer/members. See, e.g., MCL 460.38. The proposed rule requiring written communications to parties affected by tree trimming should allow the cooperatives to continue to use a periodical issued by an association of cooperative electric utilities and mailed to each member of record of the cooperative electric utility. In many cases the publication is more effective and cost efficient for cooperatives.

In addition, given the rural nature of cooperative service areas, the proposed limit of 60 days for notice can be problematic. Many circuits can take longer than two months to complete and re-noticing customers becomes problematic.

MECA respectfully requests that Staff consider the above positions and make appropriate modifications in its Final Report before filing it with the Commission. MECA appreciates

the ability to provide comments to the Staff's Report as well as throughout the duration of the Technical Standards workshop and subgroup meetings.