Utility Consumer Representation Fund

Annual Report

Calendar Year – 2022

Pursuant MCL 460.6m (22)

August 21, 2023

Prepared by:

Finance & Administrative Services

in coordination with

UCPB Board Chairman

GRETCHEN WHITMER

GOVERNOR

MARLON BROWN

INTERIM DIRECTOR

Executive Summary:

PA 304 of 1982 established a separate proceeding that allows energy utilities to more quickly recover costs for power supply and purchased gas than they otherwise could in a full rate case. It further created the Utility Consumer Representation Fund (UCRF) to provide financial resources for customers who pay these costs to be represented in these utility cost recovery proceedings.

UCRF funds are collected by certain utilities in their rates. The UCRF funds collected are split between the Attorney General (AG) and the Utility Consumer Participation Board (UCPB). The Attorney General uses the funding to advocate on behalf of the interests of the State of Michigan utility customers in general, and the UCPB is responsible for granting funding to specific interest groups to advocate on behalf of the residential consumer groups they represent. The scope of the UCPB representation on behalf of residential rate payers was expanded in PA 341 of 2016 to include rate cases, certificate of necessity cases and integrated resource plan cases which can include demand response, energy waste reduction, distributed generation programs and many more.

In 2022, Michigan's investor-owned utilities serving over 100,000 customers that have applied for the initiation of an energy cost recovery proceeding shall remit to the UCRF its proportional share of $1,806,215 (adjusted annually) and utilities servicing less than 100,000 customers that have applied for the initiation of an energy cost recovery proceeding shall remit to the UCRF its proportional share of $233,060 (adjusted annually). Together they remitted $2,039,275 to the Utility Consumer Representation Fund. The UCPB was allocated $750,000, of which 5 percent ($37,500) was allocated for administrative costs.

In CY 2022, grants totaling $700,100 were awarded to:

- Michigan Environmental Council (MEC)
- Citizens Utility Board of Michigan (CUB)
- Environmental Law and Policy Center (ELPC)

The above groups advocated on behalf of Michigan residential ratepayers. During 2022 they participated in 15 different cases before the MPSC. The primary benefit of the activity is generating record in those cases that then can be used by the MPSC to inform their decisions on the cases. In addition, UCPB grants resulted in millions in savings to residential and other ratepayers as outlined in Section 3.

Pursuant to these requirements, this report has been prepared and issued electronically to the House and Senate Standing Committees with jurisdiction over energy and utility policy issues, to meet the annual reporting requirements. In addition, this report is also posted online at www.michigan.gov/laralegreports, under *2022 MCL Reports.*

Utility Consumer Participation Board (UCPB) Members:

- Dr. Paul Isely, Chair
- Ms. Elise Matz, Vice Chair
- Mr. Sam Passmore
- Mr. Mike Troupos
- Ms. Leah Wiste

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UCRF Grant Activity and Results for 2022 Calendar Year

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UCRF 2022 Grantees Membership Scope and Description

Questions regarding this report should be addressed to:

Utility Consumer Participation Board
Attention: UCPB Board Liaison
Finance and Administrative Services
Licensing and Regulatory Affairs
611 W. Ottawa
Lansing, MI 48933
LARA-UCPB@michigan.gov

1. INTRODUCTION

Public Act 304 of 1982, as amended, provides for the establishment and implementation of gas and power supply cost recovery clauses in the rates and rate schedules of public utilities. The Utility Consumer Participation Board (UCPB) and the Utility Consumer Representation Fund (UCRF) were created by the Act to achieve equitable representation of interest of energy utility customers in energy cost recovery proceedings. The purpose of the UCPB is to make grants from the fund to qualified nonprofit organizations and local units of government to represent the interests of residential utility customers before the Michigan Public Service Commission.

Public Act 341 was passed on December 15, 2016, and signed by Governor Rick Snyder on December 21, 2016. PA 341of 2016 updates Michigan's energy laws relating to utility rate cases, electric choice, certificate of necessity, and electric capacity resource adequacy, and establishes an integrated resource planning process. The law took effect on April 20, 2017. The law expanded the UCPB's scope of cases that were allowed to use UCRF grants for residential rate payers. As set forth in 460.6m(16), UCRF grants could be used for MCL 460.6a, 6h, 6j, 6s and 6t and federal administrative and judicial proceedings that directly affect the costs or rates paid by residential utility customers. For purposes of making grants, the board may consider energy conservation, the creation of employment within the state, energy waste reduction, demand response, rate design and maintenance of energy resources.

This annual report to the Legislature, which is required under Section 6m (22) of the Act, covers the activities of the UCPB for the 2022 calendar year.

In CY 2022, grants totaling $700,100 were awarded to:

- Michigan Environmental Council (MEC)
- Citizens Utility Board of Michigan (CUB)
- Environmental Law and Policy Center (ELPC)

Combined, the grantees represent statewide nonprofit groups with tens of thousands of individual members focused on issues related to energy costs, consumer protection, environmental, public health, emerging energy, energy conservation and community action. The actions of these grantees influence energy costs for more than 3 million residential natural gas customers and 3.5 million residential electric customers in the State of Michigan.

In 2022, UCRF grant recipients participated in proceedings on behalf of residential customers in the State of Michigan. UCRF funds helped Michigan citizen advocates achieve, directly and in collaboration with other parties, significant benefits for residential utility customers across the state. In certain cases, UCRF grantees were the only advocates for Michigan residential customers. Major areas of impact for residential customers included PSCR-related decisions on transfer prices, fuel transportation costs, reliability and adequacy of electricity supply, PSCR 5-year and load forecasting, offsets

to Gas Cost Recovery (GCR) cost of gas sold to GCR customers, monitoring developments at the Midcontinent Independent System Operator (MISO), Rate Cases, Integrated Resource Plans (IRP), energy waste reduction, purchase power agreements, non-volumetric charges, low income residential customers, refunds, classification of utility scale battery storage, evaluation of projects, cost of service expenses, contingency allowances, moratorium on new rate case, extension of leases, modeling deficiencies, value of solar, outflow credit for distributed generation, distributed generation and low-income communities, low-income renewables programs.

The Attorney General's Office also receives UCRF funding for intervention on behalf of the utility ratepayers of Michigan. Coordination between the Attorney General, MPSC staff and other participants in UCRF funded cases is monitored by the board. Thorough review of grant applications, grant amendments, and regular reporting on case status and interventions by the UCPB continue to improve coordination of grantees' efforts with the Attorney General. This provides efficient use of resources and maximizes coverage of cases and issues without duplication of effort. The Attorney General's office is also consulted in its role as legal counsel to the board. Expenditures and results of the Attorney General's office are provided in a separate annual report submitted by its office to the legislature.

2. UCPB MAJOR RESPONSIBILITES

MCL 460.6l provides for the creation of a Utility Consumer Participation Board (UCPB), defines its membership, and prescribes its duties. MCL 460.6m creates the Utility Consumer Representation Fund (UCRF), establishes provisions for its generation, distribution and use, limits the beginning dates of cost recovery proceedings, and places reporting requirements on both fund recipients and the Board.

The duties and responsibilities of the Act under these two sections were discharged as described in sections 2.1 and 2.2.

2.1 UCPB Board Activities 2022

The Board approved and maintained a bimonthly meeting schedule in 2022. Regular meetings were held February 14, April 25, June 13, August 8, and October 10. All meeting notices were published and held in compliance with the Open Meetings Act. Members of the public were present at many meetings and given opportunity for public comment.

Amendments and approval of new grants occurred on February 14, April 25, June 13, August 8, and October 10.

The 2022 regular meeting schedule was approved on December 6,2021. Meeting minutes for all meetings are available on the web site www.michigan.gov/lara under “All About LARA”, “Utility Consumer Participation Board.”

2.2 UCRF Grants and Contracts Awarded by UCPB in Calendar Year 2022

2/14/2022

CUB: Grant Request for $53,025 for I&M IRP (U-21189) was approved.

MEC: Grant Request for $30,300 for I&M IRP (U-21189) was approved.

4/25/2022

CUB: Grant Request for $47,470 for Consumers Electric Rate Case (U-21224) was approved.

MEC: Grant Request for $90,900 for Consumers Electric Rate Case (U-21224) was approved.

MEC: Grant Request for $10,100 for DTE Electric 2021 PSCR Reconciliation Case (U-20827) was approved.

6/13/2022

MEC: Amendment to Grant 22-04 for $20,200 for I&M IRP (U-21189) was approved.

CUB: Grant Request for $12,625 for Northern States Power (NSP) Company Gas Rate Case (U-21126) was approved.

8/8/2022

CUB: Grant Request for $25,250 for UPPCO Rate Case (U-21286) was approved.

CUB: Amendment to Grant 22-01 for $25,250 for MISO/FERC was approved.

MEC: Grant Request for $141,400 for DTE Electric IRP (U-21193) was approved.

10/10/2022

CUB: Grant Request for $27,500 for DTE IRP (U-21193) was approved.

CUB: Grant Request for $49,500 for Consumers 2023 PSCR Plan (U-21257) was approved.

CUB: Grant Request for $19,250 for I&M 2023 PSCR Plan (U-21262) was approved.

CUB: Grant Request for $13,750 for UPPCO 2023 PSCR Plan (U-21267) was approved.

CUB: Grant Request for $13,750 for UMERC 2023 PSCR Plan (U-21265) was approved.

ELPC: Grant Request for $53,830 for DTE 2022 IRP (U-21193) was approved.

MEC: Grant Request for $11,000 for Consumers IRP (U-21090) was approved.

MEC: Grant Request for $55,000 for DTE Electric 2023 PSCR Plan (U-21259) was approved.

Total Amount of FY 2022 UCRF Grant Funding Awarded in CY 2022 = $ 315,120

Total Amount of FY 2023 UCRF Grant Funding Awarded in CY 2022 = $ 384,980

Total FY 2022 Grant Authorization = $712,500

Total CY 2022 Grants Awarded (All Years) = $700,100

Unspent 2021 Grant Authorization = $25,454

Total Amount of 2022 UCRF Grant Funding Awarded in 2021 = $427,916

These figures include grant dollars that were returned and reallocated.

2.3 Resource Availability

The total UCRF funding requested by applicants in the initial 2022 authorization year grant cycle was: $330,875. The UCRF authorization for grants was $712,500[1]. The board determined that grants would be prioritized and awarded in phases. This allowed the board to examine work plans for cases more closely and more proximate to the actual filing dates. This also allowed grantees to refine and modify grant requests prior to full consideration and approval. Grantees deferred many requests due to the phase-in approval process adopted by the board.

2.4 Resource Efficiency and Non-Duplication/Due Diligence

To further resource efficiency, the board has modified its grant review process to consider and award grants in phases closer to the actual filing dates and has also made very conservative approvals based on the work plans presented by grantees. The board has encouraged grantees to use resources carefully but to also return to the board if

1 This was the amount of funds the board understood was available for the grant year based on financial reports provided by LARA, the spending authorization approved and the adequacy of current and reserve funds. The issue of a 50/50 “shared” reserve fund was brought to the attention of the board in August 2014 and addressed thereafter.

developments in or demands of the case require additional resources. This allows detailed work plans based on the proceedings and expected results in the case can be provided and evaluated.

The UCRF grant application requires each applicant to provide a work plan specifying, among other things, the cases they intend to intervene in, the issues and strategies they intend to pursue and potential benefits to consumers. Individual board members, the UCRF board assistant, and Attorney General staff review the proposals in advance and provide comments to the board. Any potential duplication among grantees or with the Attorney General is identified and reviewed for purpose and justification. The board has not approved or reduced funding in some cases for unsupported duplication. When multiple grantees are approved for funding in the same case, grantees must report to the board on their distinct contributions and strategies in those cases. Bi-monthly case status reports are required from grantees and testimony reviewed in order to prevent or address any potential duplication of effort. The board encourages coordination of effort where it serves the interest of consumers.

2.5 Administrative Efficiency

The Board achieved administrative efficiency in the following ways:

1. Continued a grant review process requiring more detailed work plans.
2. Awarded grants in phases closer to the filing dates of actual cases and analyzed potential issues.
3. Used the grant review process to encourage more defined strategic focus areas by grantees through case updates.
4. Used the revised UCRF grant application designed by LARA Purchasing and Grant Services and the Michigan Attorney General's Office.
5. Requested the opinion of the Attorney General's office during grant review regarding the legal compliance of the individual grant applications with the governing statute or case law prior to the approval of grants and whether there was any objection to either the approval or the submission of individual grants to the State Administrative Board.
6. Requested the opinion of utility representatives present during grant review as to concerns or objections regarding the legal compliance of the individual grant applications with the governing statue or case law prior to the approval of grants and whether there was any objection to either the approval or the submission of individual grants to the State Administrative Board.
7. Renewed the contract position for a part-time contractor to assist the Board and coordinate efforts with other parties of interest.
8. Followed regular bi-monthly meeting schedule.
9. Continued to request bi-monthly case status reports from grantees.
10. Formalized process of written grant amendments and documented board approval prior to submission to LARA.

11. Updated annual report.
12. Coordinated with LARA staff to distribute board information and post public information on a web site.

3. UCRF GRANT RECIPIENT RESULTS

3.1 Benefit-Cost Analysis and Discussion

In creating cost recovery mechanisms that allowed utilities to recover energy supply costs from ratepayers outside of a contested rate case, the Michigan Legislature assured that Michigan's residential energy customers would be effectively represented through the creation of the Utility Consumer Representation Fund (UCRF). UCRF funding is collected from assessments on utilities that use the cost recovery mechanism. This cost is paid by customers through their rates. Therefore, the revenue for the fund is generated from ratepayers and expended to assure their representation in utility rate cases, power supply cost recovery, gas cost recovery, reconciliation phases of PSCR and GCR cases, certificate of necessity cases, and integrated resource plan cases.

The table shows the grants closed out during 2022. Included is an estimated ROI provided by the grantee. These ROI numbers are subjective particularly as there can be many intervenors in a given case combined with the substantial efforts of the MPSC staff. However, these numbers try and adjust for this. It shows that the efforts of intervenors have had a substantial return on investment for Michigan Residential ratepayers. In addition, there are many results where an ROI cannot be easily estimated, but there are positive effects for ratepayers.

Table of Grants Closed Out During 2022

	Docket No.	**Case Title**	**UCRF Grant No.**	**UCRF Grant Amt. Granted (As amended)**	**Estimated Savings**
Michigan Environmental Council 2022	U-20826	Consumers Energy 2021 IRP	21-04	$101,000.00	
Michigan Environmental Council 2022	U-20963	Consumers Electric Rate Case	21-04	$101,000.00	Part of $197,882,000

Michigan Environmental Council 2022	U-20528	DTE Electric 2020 PSCR Reconciliation	21-04	$80,800.00	
Michigan Environmental Council 2022	U-21090	Consumers Energy 2021 IRP	21-04	$101,000.00	
Michigan Environmental Council 2022	U-21189	I&M 2022 IRP	22-04	$50,500.00	
Michigan Environmental Council 2022	U-20836	DTE Electric 2022 Rate Case	22-04	$126,250.00	$11,699,546
Citizens Utility Board of Michigan 2022	U-21090	CECo IRP	21-06 (GG21*957)	$25,250.00	$17,000,000
Citizens Utility Board of Michigan 2022	U-21081	UMERC IRP	22-06 (GG 22*611)	$27,775.00	$2,478,000
Citizens Utility Board of Michigan 2022	U-21087	DTE Voluntary Prepay	22-06 (GG 22*611)	$12,625.00	$3,150,000
Citizens Utility Board of Michigan 2022	U-21058	UPPCO 2022 PSCR Plan Case	21-06 (GG21*957)	$12,625.00	
Citizens Utility Board of Michigan 2022	U-21056	UMERC 2022 PSCR Plan Case	21-06 (GG21*957)	$12,625.00	
Citizens Utility Board of Michigan 2022	U-21097	Northern States Power Company Rate Case	21-06 (GG21*957)	$17,675.00	$200,000

Citizens Utility Board of Michigan 2022	U-21148	Consumers Gas Rate Case	22-06 (GG22*611)	$24,947.00	$10,800,000
Citizens Against Rate Excesses 2022	U-20150	UPPCO RDM Complaint Case	20-01	$50,000.00	$1,932,481
Environmental Law & Policy Center, 2022	U-21090	Consumers IRP	21-07	$43,380.00	
Soulardarity and We Want Green, Too, 2022	U-20836	DTE Electric Rate Case	22-07	$78,780.00	Part of $358,000,000
Michigan Municipal Association for Utility Issues, 2022	U-20836	DTE General Electric Rate Case	22-08	$26,360.00	

4. FINANCIAL REPORTING AND GRANT ADMINISTRATION

4.1 Calendar Year 2021 Remittances

The following information is compiled and provided by the Michigan Department of Licensing and Regulatory Affairs (LARA) for purposes of the Annual Report.

Public Act 341 of 2016, Sec. 6m(2) requires energy utility that has applied to the commission for the initiation of an energy cost recover proceeding shall remit to the fund before or upon filing its initial application for that proceeding, and on or before the first anniversary of that application, an amount of money determined by the board in the following manner:

- Energy utility company serving at least 100,000 customers in this state, its proportional share of $900,000 adjusted annually by a factor as provided in subsection (4)
- Energy utility company serving at least 100,000 residential customers in this state, its proportional share of $650,000 adjusted annually by a factor as provided in subsection (4).
- Energy utility company serving fewer than 100,000 customers in this state, its proportional share of $100,000 adjusted annually by a factor as provided in subsection (4)
- Energy utility company serving fewer than 100,000 residential customers in this state, its proportional share of $100,000 adjust annually by a factor as provided in subsection (4).

The consumer price index for the Detroit standard metropolitan statistical area...between January 1981 and January of the year in which the payment is required to be made." Since enactment of Act 304, total remittances have been as follows:

1982	$630,600	2003	$981,150
1983	$653,400	2004	$988,350
1984	$582,250	2005	$1,013,299
1985	$569,600	2006	$1,052,150
1986	$592,650	2007	$1,069,450
1987	$596,050	2008	$1,096,950
1988	$615,250	2009	$1,088,750
1989	$650,450	2010	$1,103,851
1990	$683,450	2011	$1,125,700
1991	$715,300	2012	$1,176,700
1992	$728,650	2013	$1,198,650
1993	$745,838	2014	$1,204,750
1994	$760,266	2015	$1,173,850
1995	$791,900	2016	$1,180,500
1996	$813,000	2017	$1,750,000
1997	$834,050	2018	$1,788,325

1998	$851,728	2019	$1,808,625
1999	$864,600	2020	$1,862,175
2000	$899,000	2021	$1,886,675
2001	$930,650	2022	$2,039,275
2002	$946,150		

In 2022, the factor is set at a level not to exceed the percentage increase in the Consumer Price Index for urban wage earners and clerical workers, select areas, all items indexed, for the Detroit standard metropolitan statistical area, compiled by the Bureau of Labor Statistics of the United States Department of Labor. The factor for subsequent years will be established by calculating the percentage increase in the Detroit CPI-W for January each year over the CPI-W for January the following year.

Source of Calendar Year 2022 Remittance Revenue		Distribution of Calendar year 2022 Revenue	
Utility	Amount Contributed	Recipient	Amount Allocated
Consumers Energy	$843,501	Attorney General	$1,027,800.00
DTE Electric	680,231	Intervenor Grants	712,500
DTE Gas	187,345	Administration (5%)	37,500
Michigan Gas Utilities	18,977		$1,777,000
SEMCO	41,454		
Northern States Power (dba XCEL)	19,372		
Alpena Power	21,149		
American Electric Power (I&M)	43,707		
Upper Peninsula Power	94,919		
Upper Michigan Energy Resources	97.620		
TOTAL	$2,039,275		

Letters were sent to each utility on 05/18/2022 and all remittances were made by 09/30/2022.

In addition to the calendar year 2022 utility fees, interest was earned for the Fiscal Year ending 9/30/2020. This was allocated to the Attorney General.

4.2 Fiscal Year 2022 Appropriation and Accrued Funds

Total funding available for awarding intervenor grants was $712,500 for FY22 as shown below and $750,000 FY22 authorization subject to budget approval.

Intervenor Grant Funding for fiscal year 2022:

Appropriation (Public Act 87 of 2021)	$750,000
Less 5% for Administration	(37,500)
Appropriation Available for Intervenor Grants	$ 712,500
New Revenue	$712,500
Fiscal Year 2021 Unreserved Fund Balance	$86,372
Fiscal Year Interest Earned from Common Cash Fund	$8,470
Total Available if sufficient spending authorization	$807,342

4.3 Scope of Work

Money from the UCRF, less administrative costs, may be used only for participation in administrative and judicial proceedings under sections 6a,6h, 6j, 6s and 6t [of P.A. 341] and in federal administrative and judicial proceedings which directly affect the energy costs paid by Michigan energy customers. 6m(11) "For purposes of making grants, the board may consider energy conservation, energy waste reduction, demand response, and rate design options to encourage energy conservation, energy waste reduction, as well as the maintenance of adequate energy resources." The Attorney General has issued formal and informal opinions to guide the Board regarding cost matters that may be covered by Act 341 grants. The Act describes several kinds of proceedings. Cases required by statute are:

Gas supply and cost recovery	Power supply and cost recovery
Gas supply and cost reconciliation	Power supply cost reconciliation
Rate Case	Certificate of Necessity
Integrated Resource Plan	

Decisions in any of these proceedings may be appealed to the Court of Appeals. Grant proposals compliant with the provisions of the Act were solicited for intervention in on-going and new GCR Plan cases, GCR Reconciliation proceedings, PSCR Plan cases, PSCR Reconciliation proceedings, Rate, Certificate of Necessity and Integrated Resource Plan and other cases eligible under Act 341.

4.4 Application and Selection Process

Act 341 of 2016 limits eligibility for funding to non-profit organizations or local units of government in Michigan, places specific additional restrictions on applicants, and suggests criteria that could be used in the selection process.

Applications for grants were received from:

- Citizens Utility Board (CUB)
- Environment Law and Policy Center (ELPC)
- Great Lakes Renewable Energy Association (GLREA)
- Michigan Environmental Council (MEC)
- Michigan Municipal Association for Utility Issues (MI-MAUI)
- Soulardarity.

Funding decisions were made as close to the filing of cases as possible in order to review the grant application work plans in more detail and render better decisions on potential benefits to consumers.

Questions regarding this report should be addressed to:

Utility Consumer Participation Board
Attention: UCPB Board Liason
Finance and Administrative Services
Licensing and Regulatory Affairs
611 W. Ottawa
Lansing, MI 48933
LARA-UCPB@michigan.gov

ATTACHMENT A: UCRF Grant Activity and Results

The following are results in cases in which an ORDER(S) has been issued in the period January 1, 2022-December 31, 2022. Some of the cases in which UCRF grantees participate in 2022 will not conclude until subsequent years. Results for those cases will be reported in future annual reports. Results are reported by grantees and audited by UCPB board staff based on an independent review of the record and edited for purposes of this annual report. Complete dockets related to the majority of cases are available through the Michigan Public Service Commission's Electronic Docket Filing System (eDocket) at www.michigan.gov/mpsc. Results for individual cases may be verified by reviewing the case docket. MPSC case numbers have been included for purposes of research and validation.

Grantee: Michigan Environmental Council, 2022

Docket No.	Case Title	UCRF Grant No.	UCRF Grant Amt. Granted (As amended)	Balance (11/30/22)	Other Financial Support (matching funds, pro-bono support, etc.)
U-20836	DTE Electric 2022 Rate Case	22-04	$126,250.00	$0.00	$10,305.00
The Commission's final order in DTE Electric Company's 2022 general rate case is very favorable. The Commission granted DTE a rate increase of about $30 million out of $388 million requested. The rate increase is based on a revenue deficiency of the same amount for a projected test year that runs from November 1, 2022 through October 31, 2023. Of the approximately $358 million difference between what DTE requested and received, $100 million resulted from the Commission's adoption of the Attorney General's higher sales forecast instead of DTE's lower sales forecast; and approximately $38 million resulted from the Commission's decision to maintain DTE's current return on equity (ROE) rather than increase it. The remaining roughly $220 million resulted from disallowing the inclusion of various capital expenditures in rate base and adjusting various operations and maintenance (O&M) expenses. We accomplished many of our objectives within that remaining $220 million of reductions. For additional details, please see the memo that was submitted for the UCPB meeting originally scheduled for December 12, 2022.					

MEC was directionally aligned with the Attorney General but did not participate in a joint litigation agreement.

The total savings for which we claim credit is $11,699,546, which divided by $126,500 in grant funds equals an ROI of 92 to 1. Please see the ROI estimate submitted for the UCPB meeting originally scheduled for December 12, 2022 for additional details (please note the ROI estimate shows an ROI of 102 because at that point we did not realize the remaining expert funds of $11,250 were going to be used).

Docket No.	Case Title	UCRF Grant No.	UCRF Grant Amt. Granted (As amended)	Balance (10/31/22)	Other Financial Support (matching funds, pro-bono support, etc.)
U-20826	Consumers Energy 2021 IRP	21-04	$101,000.00	$13,392.84	$1,060.30

The issues in this case were NEXUS costs and costs for the last five months of waste gas burned at River Rouge prior to its retirement at the end of May 2021. The ALJ issued an unfavorable Proposal for Decision March 25, 2022; MEC filed exceptions and the Commission issued an order on October 5 that is similar to the order in U-20528. MEC's view is that the Commission has left no viable path open to challenging NEXUS costs going forward, and MEC will no longer be seeking funding to do so.

MEC was directionally aligned with the Attorney General but did not participate in a joint litigation agreement.

Docket No.	Case Title	UCRF Grant No.	UCRF Grant Amt. Granted (As amended)	Balance (03/15/2022)	Other Financial Support (matching funds, pro-bono support, etc.)
U-20963	Consumers Electric Rate Case	21-04	$101,000.00	$5,947.13	$6,264.43 Pro bono support

MEC and partners intervened in this general electric rate case and advocated on a wide array of issues including distribution capital expenditures, generation capital expenditures, cost allocation, pilot programs, rate design, and low-income customer issues. MEC had significant outcomes as reflected in the ROI reported below.

MEC was directionally aligned with the AG but did not participate in a joint litigation agreement.

ROI: The total ROI was **370 to 1**. Overall, the Commission approved a rate increase of $27.118 million, which is $197.882 million less than requested by Consumers. In addition, the Commission also imposed numerous requirements on Consumers Energy for its next rate case and other proceedings.

Docket No.	Case Title	UCRF Grant No.	UCRF Grant Amt. Granted (As amended)	Balance (10/31/22)	Other Financial Support (matching funds, pro-bono support, etc.)
U-20528	DTE Electric 2020 PSCR Reconciliation	21-04	$80,800.00	$13,652.42	$2,025.75

The primary issues in this case were a new NEXUS forecast by DTE and issues resulting from the COVID pandemic, including the commitment and dispatch of fossil generating units during an environment of low natural gas and market energy prices. The ALJ issued a Proposal for Decision on July 18, 2022. With respect to NEXUS, the amounts DTE paid NEXUS for gas transport exceeded the value of the service in 2020, imposing a net or excess cost of $6.44 million. In its Order in the 2020 PSCR plan case leading up to this reconciliation, Case No. U-20527, the Commission issued a Section 7 warning to DTE regarding the NEXUS costs. The Commission also established a framework for determining whether the NEXUS costs were reasonable and complied with the affiliate price cap in the MPSC Code of Conduct. The Commission directed DTE Electric to take certain actions and provide certain evidence in order for the Commission to make those determinations.

The ALJ in this case found that DTE Electric did not take the actions or provide the evidence directed by the Commission. However, in the time between the 2020 plan case order and the PFD, the Commission issued an Order in DTE Electric's 2019 PSCR reconciliation. In that Order, the Commission determined that NEXUS costs were reasonable because they were below the FERC filed rate. The ALJ in this case found that, despite DTE Electric's failure to comply with the Commission's directives in the 2020 plan case, the Commission's more recent order in the 2019 reconciliation case insulated DTE Electric from any disallowance for NEXUS costs in this case. The ALJ did recommend that the Commission issue similar directives to DTE Electric for future cases, and concluded her NEXUS discussion with insightful commentary about the ongoing and future challenges presented by these excessive costs.

MEC and the AG submitted exceptions to ask the Commission to adopt most of the PFD's findings but disallow a portion of the NEXUS costs. DTE submitted exception taking issue with the PFD's findings that were adverse for DTE. MEC, the AG, and DTE replied to each other's exceptions. On October 27, the Commission issued an order adopting the 2019 reconciliation method rather than the method it had prescribed for this reconciliation case in its plan order. MEC's view is that the Commission has left no viable path open to challenging NEXUS costs going forward, and MEC will no longer be seeking funding to do so.

MEC was directionally aligned with the AG but did not participate in a joint litigation agreement.

Docket No.	Case Title	UCRF Grant No.	UCRF Grant Amt. Granted (As amended)	Balance (10/31/2022)	Other Financial Support (matching funds, pro-bono support, etc.)

U-21090	Consumers Energy 2021 IRP	21-04	$101,000.00	$220.09	$11,446.37

After a Proposal for Decision that was favorable on almost all issues except the Campbell unit 3 retirement, Consumers has reached a settlement with most of the parties that achieves all of MEC's main objectives in this case. Three parties are contesting the settlement with most of the parties that achieves all of MEC's main objectives in the case. Three parties are contesting the settlement and a contested settlement proceeding is underway.
MEC was directionally aligned with the AG but did not participate in a joint litigation agreement.

ROI: This case is ongoing as it has been appealed by Wolverine Power and MEC is seeking continued funding in Grant 23-04 to defend the settlement.

Docket No.	Case Title	UCRF Grant No.	UCRF Grant Amt. Granted (As amended)	Balance (10/31/22)	Other Financial Support (matching funds, pro-bono support, etc.)
U-21189	I&M 2022 IRP	22-04	$50,500.00	$0.00	$3,289.79

The hearing in this case has taken place and briefs have been filed. Staff and I&M reached a bilateral settlement agreement that they are trying to push through over the objections of most of the other parties. MEC will submit a request for supplemental funding for the contested settlement process in Grant 23-04.

MEC was directionally aligned with the AG but did not participate in a joint litigation agreement.

ROI: This case is ongoing as MEC is seeking continued funding in Grant 23-04 to contest the settlement.

Total 2022 ROI for all cases in this report: **188 to 1.**

Grantee: Citizens Utility Board of Michigan, 2022

Docket No.	Case Title	UCRF Grant No.	UCRF Grant Amt. Granted (As amended)	Balance (07/22/22)	Other Financial Support (matching funds, pro-bono support, etc.)
U-21090	CECo IRP	21-06 (GG21*957)	$25,250.00	$3,321.66	

On June 23, the MPSC approved a settlement agreement that ends debate over the IRP between Consumers Energy and a number of organizations involved in the case, including CUB, the Michigan Environmental Council, the Natural Resources Defense Council, the Sierra Club, the Great Lakes Renewable Energy Association, the Michigan Public Power Agency and others. The settlement allows Consumers Energy to move forward with the IRP, and the utility agrees to several provisions, including: Units 1,2 and 3 at the Campbell plant will be retired by 2025. Unit 3 was previously slated to be retired by 2039; Consumers Energy will purchase the Covert Generating Station, a natural gas-fired power plant in Van Buren County; The utility will "speed up deployment of energy storage resources from 2030 to 2024, aiming for 75 MW of storage by 2027 and 550 MW by 2040," as the MPSC described in a statement. Consumers Energy will also bring "thousands of [MW] of solar energy capacity online in the next several years as part of the company's plans to add about 8,000 MW of solar generation by 2040," the statement said.

CUB and the AG entered into a joint litigation agreement in this case.

ROI: As a result of the settlement, the reduction from the requested ROE of 9.9% to 9.0% was worth a savings of approximately $63 million. Additionally, the company agreed to donate $5 million in 2022 to a fund that provides income-based energy bill assistance to Consumers Energy's electric customers, along with $2 million in continued annual donations for 14 years (for a total of $33 million). CUB spent $21,928.34 total on the case. There were 4 intervenors engaged on this issue in the case, so if CUB takes credit for 1/4th of the savings for just the first year ($63 million + $5 million = $68 million/4 = $17 million), the cost benefit ratio would be **775:1** ($17,000,000/$21,928.34).

Docket No.	Case Title	UCRF Grant No.	UCRF Grant Amt. Granted (As amended)	Balance (06/10/22)	Other Financial Support (matching funds, pro-bono support, etc.)
U-21081	UMERC IRP	22-06 (GG 22*611)	$27,775.00	$20,581.30	

CUB, the AG, Savion and MPSC staff reached a settlement agreement with UMERC. Under the settlement, UMERC agreed to competitively procure 100 MW of solar power and work with the MPSC staff to evaluate the potential for more renewable procurement. UMERC will also adopt an EWR standard of 1.5% of its 3-year average historical sales in 2022 and 2023 (excluding the Tilden mine and self-direct customers), and agreed to file biennial EW plan cases in which it will investigate the possibility of increasing EWR savings levels. The MPSC approved the settlement May 12th.

CUB and the AG entered into a joint litigation agreement in this case.

ROI: The total spent on this case was $7,193.70. For the most part the settlement accepted UMERC's proposal, which CUB closely scrutinized. It is hard to assign an ROI to that. The main change was to increase the target EW savings from 1.0% to 1.5%. Accumulating this effect over 5 years, when the next IRP is required and applying the costs of EWR and the avoided cost of electricity, there is a net savings per customer of about $59. For 42,000 customers this totals $2,478,000. The cost benefit ratio would be **344:1** (2,478,000/7,193.70).

Docket No.	Case Title	UCRF Grant No.	UCRF Grant Amt. Granted (As amended)	Balance (11/30/22)	Other Financial Support (matching funds, pro-bono support, etc.)
U-21087	DTE Voluntary Prepay	22-06 (GG 22*611)	$12,625.00	$2.54	

CUB intervened and filed testimony arguing DTE's proposed voluntary pre-pay program would expose participants to elevated risk of shutoff without offering any benefits that could not be offered through the standard payment plan. DTE had proposed spreading the program costs across its entire customer base, while only customers enrolled in the program would actually "benefit." In late December, the MPSC issued an order agreeing with CUB, the AG and others

that DTE failed to demonstrate that the alleged benefits of the program outweigh the potential risks and costs. The MPSC denied the request in full.

CUB and the Attorney General had a joint litigation agreement in this case.

ROI: CUB spent a total of $12,622.46 in UCRF grant funding on this case. The cost to residential ratepayers to start this program would have been $12.6 million with unspecified costs to keep the program running after that. There were four intervenors in the case, so if CUB takes credit for 1/4 of the savings, that is $3.15 million. The cost/benefit ratio is **250:1** ($3,150,000/$12,622.46)

Docket No.	Case Title	UCRF Grant No.	UCRF Grant Amt. Granted (As amended)	Balance (07/22/22)	Other Financial Support (matching funds, pro-bono support, etc.)
U-21058	UPPCO 2022 PSCR Plan Case	21-06 (GG21*957)	$12,625.00	$4,543.76	

Upper Peninsula Power Co. filed its Power Supply Cost Recovery plan for the 2022 calendar year, along with its five-year forecast of power supply requirements and costs. After thorough review of testimony and discovery, CUB and the AG concluded that no testimony was warranted in the case. A settlement among the parties was reached and was filed on April 14th and was approved by the Commission without modification on May 12.

CUB and the Attorney General entered into a joint litigation agreement in this case.

The settlement did not result in any "savings" for the customer. Nevertheless, we think residential customers benefit by having CUB thoroughly review the filing and only $8,081.24 of UCPB funds was spent to do so.

Docket No.	Case Title	UCRF Grant No.	UCRF Grant Amt. Granted (As amended)	Balance (04/21/22)	Other Financial Support (matching funds, pro-bono support, etc.)

U-21056	UMERC 2022 PSCR Plan Case	21-06 (GG21*957)	$12,625.00	$7,159.67	

After thorough review of testimony and discovery, CUB and the AG concluded that no testimony was warranted in the case. CUB evaluated the accuracy of their market bids for purchased power and concluded they were doing a good job. CUB also looked at the cost splits in the special contract with the mines and everything was in order. A settlement was entered on March 18 and the MPSC approved the settlement on April 14, 2022

CUB and the Attorney General entered into a joint litigation agreement in this case.

The settlement did not result in any "savings" for the customer. Nevertheless, we think residential customers benefit by having CUB thoroughly review the filing and only $5,465.33 of UCPB funds was spent to do so.

Docket No.	Case Title	UCRF Grant No.	UCRF Grant Amt. Granted (As amended)	Balance (04/21/22)	Other Financial Support (matching funds, pro-bono support, etc.)
U-21097	Northern States Power Company Rate Case	21-06 (GG21*957)	$17,675.00	$12,676.78	

Settlement of this case was approved by the MPSC at their 3-17-22 meeting. The settlement agreement approves a total revenue requirement of $2,530,513, with a return on common equity of 9.7% and an overall electric rate of return of 5.89%. The increased rates will take effect in customer bills beginning April 1. A typical residential customer using 500 KW hours per month will see an increase of $8.69, or 12.4%, in their monthly bill NSP, part of Xcel Energy Inc., serves about 9,000 electricity customers in Gogebic and Ontonagon counties. As part of the agreement, NSP agrees not to seek a Michigan rate increase again before Jan. 1, 2024. The utility also will implement an earnings-sharing mechanism for 2022 and 2023 in which it will refund to its electric customers any multi-jurisdictional earnings above the authorized 9.7% rate of return on common equity. NSP projected a revenue deficiency of $2,130,513 based and

sought to recover $400,000 of depreciation and interest expense deferred in 2021 as a regulatory asset, consistent with Case No. U-20901. The settlement agreement permits NSP to amortize over 4 years the depreciation deferral total of $400,000. Other terms of the agreement: NSP will implement in 2022 a low-income assistance service program and agrees to donate $25,000 per year in 2022 and 2023 for low-income utility bill assistance. NSP will perform tree-trimming or other vegetation management on at least 75 miles of overhead lines as part of its efforts to maintain service reliability. The utility will provide to MPSC a plan to reduce electric outages in its Michigan service territory and improve electric service reliability. NSP also will provide comparative actual reliability data for its Michigan service territory for the relevant historic period.

CUB and the Attorney General entered into a joint litigation agreement in this case.

ROI: The total spent on this case was $4,998.22. NSP had proposed an annual increase of $2.5 million. The MPSC approved $1.7 million, which equals a savings of $800,000/year. There were 4 parties in the case, therefore CUB will take credit for 1/4th of the annual savings or $200,000. For just one year of savings, the cost benefit ratio would be **40:1** (200,000/4998.22).

Docket No.	Case Title	UCRF Grant No.	UCRF Grant Amt. Granted (As amended)	Balance (07/15/22)	Other Financial Support (matching funds, pro-bono support, etc.)
U-21148	Consumers Gas Rate Case	22-06 (GG22*611)	$24,947.00	$20,229.06	

The MPSC approved a settlement that Consumers Energy has reached with various groups, including CUB, on its natural gas rate case (U-21148) that will cut the utility's proposed rate increase from $278 million to $170 million. As a result of the settlement, the residential rate increase will fail from 12.5%, as requested by Consumers Energy, to 7.7%. One important change from the utility's original request to the settlement is a decrease in the return on equity from 10.5% to 9.9%. Another concession from the utility that cut the proposed rate hike was that the settlement will continue "the prohibition on the Consumers Energy recovering costs related to the fire at the Company's Ray Station consistent with the Commission's orders in previous cases unless the Company prevails in a pending appeal before the Court of Appeals," as Attorney General Dana Nessel's office described in a statement.

CUB and the AG had a joint litigation agreement in this case.

ROI: The total CUB spent on this case was $4,717.94. Consumers had proposed an annual increase of $278 million. The MPSC approved $170 million, which equal a savings of $108 million per year. There were 10 intervenors in this case, therefore CUB will take credit for 1/10th of the savings ($10.8 million). For just one year of savings, the cost benefit ration would be **2289:1** (10,800,000/4717.94).

Total 2022 ROI for all cases in this report: $40,618,000 savings / $58,528.63 funds used = **697 to 1.**

Grantee: Citizens Against Rate Excess, 2022

Docket No.	Case Title	UCRF Grant No.	UCRF Grant Amt. Granted (As amended)	Balance (09/30/22)	Other Financial Support (matching funds, pro-bono support, etc.)
U-20150	UPPCO RDM Complaint Case	20-01	$50,000.00	$14,821.38	

This case began when an industrial customer received a refund due to a determination by the Court of Appeals that the charge was unlawful. CARE then filed a complaint case asking that residential ratepayers receive a refund as well on April 6, 2018. UPPCO vigorously opposed the effort and filed a motion to dismiss and appealed the decision of the Commission. Then UPPCO unsuccessfully appealed to the Circuit Court. On February 6, 2020, the Attorney General joined the case on CARE's side More motions were filed and rejected. Testimony was submitted by the AG and CARE on May 1, 2020. Staff filed testimony on June 1, 2020. Rebuttal testimony was filed July 1, 2020. More motions were filed to no avail. Finally, on October 8, 2020 a Settlement Agreement was entered. The Agreement called for a $1.625 million refund to residential ratepayers over the 1st 4 months of 2022.

Additionally, UPPCO agreed to contribute $75,000 to local community action agencies to assist with weatherization efforts. The case remained open so that CARE's expert could oversee compliance in 2022. CARE'S expert has completed its review and concluded that the residential credits were factored into residential rates as required by the settlement agreement.

On February 6, 2020, the Attorney General joined the case.

ROI: The cost/benefit ratio is **54:1** ($1,932,481/$35,178).

Grantee: Environmental Law & Policy Center, 2022

Docket No.	Case Title	UCRF Grant No.	UCRF Grant Amt. Granted (As amended)	Balance (08/12/22)	Other Financial Support (matching funds, pro-bono support, etc.)
U-21090	Consumers IRP	21-07	$43,380.00	$5,423.75	Approximately $60,000

ELPC submitted the testimony of 8 witnesses, including the three PSE expert witnesses funded by the UCPB. The case was resolved on settlement, and the settlement included substantially all of the recommendations made by the three PSE expert witnesses regarding Environmental Justice Analysis. These provisions would not have been included in the settlement if not for the testimony of the UCPB funded experts. These settlement provisions are particularly important because they have now formed the basis for the MPSC's revision of IRP filing guidelines, which means that, if approved, the provisions advocated by the PSE experts will apply to all Michigan utilities. The settlement also abandoned purchase of the Dearborn Industrial Generation facility - a unit that the PSE experts found had significant negative impact on EJ communities.

ELPC communicated with the Attorney General's office throughout the course of the case, but their most significant coordination was during settlement negotiations. The AG was able to negotiate shareholder funding for low-income programs, which was a very important component from an Environmental Justice perspective.

ROI: There is no dollar number placed on the environmental justice provisions of the settlement. However, the $20 million shareholder payment to low income programs is significant. ELPC notes that the expert witness costs were less than anticipated, and the $5,423.75 will not be expended.

Grantee: Soulardarity and We Want Green, Too, 2022

Docket No.	Case Title	UCRF Grant No.	UCRF Grant Amt. Granted (As amended)	Balance (09/30/22)	Other Financial Support (matching funds, pro-bono support, etc.)
U-20836	DTE Electric Rate Case	22-07	$78,780.00	$0.00	$173,250.00 (for pro bono legal services)

Completed full intervention including the submission of testimony from 5 witnesses, settlement negotiations, and coordination with other intervening parties. Soulardarity and WWG2 (collectively DAAO) achieved major outcomes in this case including the reduction of the residential rate hike from 9% to less than 1%, improving rather than degrading the value of solar, and direction from the Commission to DTE and Commission staff to advance community solar, integrate equity into infrastructure planning, improve low-income programs, and broadly bring racial and economic equity into decision-making by DTE and regulatory staff.

DAAO communicated with the Attorney General's office prior to and throughout the case. With one minor exception in replies, DAAO supported and provided complementary positions to those of the Attorney General which were reflected in the final order.

ROI: DAAO claims some responsibility for the overall reduction of DTE's request from $388 M down to $30 M. DAAO's testimony highlighting the direct impacts of DTE's proposals and historic performance reinforced other intervening parties' arguments about cost of capitals, prudency of investment plans, and reasonableness of various pilot proposals. In addition, the Commission orders on equity represent a possibility to financially value DTE's poor equity performance and measure improvements to health, safety, and reliability in concrete terms. This represents a substantial step towards being able to win measurable material benefits for disadvantaged ratepayers in future cases.

Grantee: Michigan Municipal Association for Utility Issues, 2022

Docket No.	Case Title	UCRF Grant No.	UCRF Grant Amt. Granted (As amended)	Balance (01/20/23)	Other Financial Support (matching funds, pro-bono support, etc.)
U-20836	DTE General Electric Rate Case	22-08	$26,360.00	$0.00	

MAUI focused on impact on customers of high residential rates and poor reliability, providing testimony from eight public officials from Cities of Lincoln Park, Ferndale and Ann Arbor, Washtenaw County, Washtenaw County Parks and Recreation. MAUI also provided expert testimony on burdensome and ineffective customer deposit practices and DTE's marketing of optional fee-based reliability services (battery backup and surge protection) that reduce the Company's incentive to provide reliable, high-quality power. MAUI also provided expert testimony on DTE's failure to provide customers and local governments with reliability data that can help them protect themselves, evaluate need and value of reliability measures and seek credits for damages caused by outages and power surges or sags.

The AG provided complementary expert testimony on residential rates and reliability and concurred with MAUI's position on DTE's behind-the-meter residential battery pilot proposal.

ROI: The Commission was very critical of DTE's evidence supporting its proposed reliability investments, in light of weak results from past investments as highlighted by MAUI and other intervenors, and authorized less than 10% of DTE's requested revenue increase. The Commission also agreed with MAUI and other intervenors that DTE's reliability performance merited a reduced rate of return, but citing uncertainty created by macroeconomic conditions declined to reduce ROR from the current rate. The Commission referred our concerns about customer deposit practices to the Energy Affordability and Accessibility Collaborative. The Commission did not adopt MAUI's recommendations for mandated sharing with customers, not for lack of merit but for lack of specificity.

ATTACHMENT B: UCRF 2022 Grantees Membership Scope and Description

Citizens Against Rate Excess (CARE) www.utilityratewatch.org. Michigan non-profit corporation that serves as a consumer watchdog group to focus on utility rates. They have members across the State of Michigan, mostly in outstate Michigan, including the Upper Peninsula. The goal of the organization is to seek grants from the UCPB and help the Board "maximize the number of hearings and proceedings with intervener participation" as provided by MCL 460.6m (18). For example, Intervener participation in PSCR cases of the electric utility companies that serve the upper peninsula have been rare and this organization has filled that gap. The organization also sought to fill the void in the lack of Michigan residential ratepayer participation in federal proceedings "which directly affect the energy costs paid by Michigan utilities," MCL 460.6m (17). The objective to participation in these federal proceedings is to 1.) advocate for a U.P. solution that avoids SSR charges, and 2.) encourage regional transmission authorities to approve transmission construction that decreases congestion and brings low-cost renewable energy to Michigan thereby saving ratepayers money.

Citizens Utility Board of Michigan (CUB) www.cubofmichigan.org. The Citizens Utility Board of Michigan (CUB of MI) was formed in 2018 to represent the interests of residential energy customers across the state of Michigan. CUB of MI educates and engages Michigan consumers in support of cost-effective investment in energy efficiency and renewable energy and against unfair rate increase requests. CUB of MI gives a voice to Michigan utility customers and helps to ensure that citizens of the state pay the lowest reasonable rate for utility services and also benefit from the environmental implications of investment in clean energy. CUB of MI is a nonpartisan, nonprofit organization whose members are individual residential customers of Michigan's energy utilities.

Environmental Law and Policy Center (ELPC): https://elpc.org/. ELPC is the Midwest's leading public interest environmental legal advocacy and eco-business innovation organization, and among the nation's leaders. We develop and lead successful strategic advocacy campaigns to improve environmental quality and protect our natural resources. ELPC advocates for smart, productive solutions in three major target areas: (1) accelerating clean renewable energy and energy efficiency development that avoid pollution from coal plants, protect environmental quality and public health, spur job creation and grow green businesses while helping to solve climate change problems; (2) protecting the Great Lakes, where we live, work and play, and protecting the Midwest's Wild and Natural Places, including the waterways and forests that provide key wildlife habitat, sustain biodiversity and provide recreational and economic vitality for people and our communities; and (3) accelerating innovative transportation technologies – including more efficient electric vehicles and cleaner fuels,

a Midwest high-speed rail network and better public transit, and sustained land use strategies.

Great Lakes Renewable Energy Association (GLREA) www.glrea.org. GLREA is a state-wide non-profit that promotes renewable energy by advocating for stronger state policies and by informing and educating Michigan citizens, organizations, and leaders on how they can achieve a greater use of renewable energy and its many economic and environmental benefits.

Michigan Environmental Council (MEC) www.environmentalcouncil.org. Statewide nonprofit public interest and environmental organization consisting of over 70 public health and environmental organizations, having over 200,000 members.

Michigan Municipal Association for Utilities Issues (MI-MAUI): https://mi-maui.org/. MI-MAUI represents interests of, and provides

technical assistance and education to, local government agencies in Michigan in matters involving regulate utilities, including state

regulatory processes and direct business relationships with utilities. By providing a collective, focused voice and expert technical

analysis, MI-MAUI helps local governments save money, deliver more effective services and achieve policy goals; by focusing utility related priorities and positions of local governments, MI-MAUI seeks to expedite action by utilities and regulatory agencies. MI-MAUI

currently has eight dues-paying members including the cities of Clint, Detroit, Ann Arbor and Washtenaw County. MI-MAUI

communicates with and serves interests of non-member communities on a less comprehensive basis.

Soulardarity www.soulardarity.com**.** Soulardarity is a membership-based 501c3 non-profit. The board is comprised of and elected by our members and must be a majority of Highland Parkers.