



# **Annual Report on the Implementation of PA 295**

## **2020 Utility Energy Waste Reduction Programs**

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## Executive Summary

Michigan's Energy Waste Reduction (EWR) standard, created under Public Act 295 of 2008, as amended by Public Act 342 of 2016 (Act 295 or the Act), also known as *the clean and renewable energy and energy waste reduction act*, requires all natural gas and electric utility providers in the state to implement programs for their customers to reduce overall energy usage by specified targets, in order to reduce the future cost of service to utility customers. This report complies with Section 97 of the Act.

In 2020, the Commission approved 10 EWR annual reconciliation case filings for program year 2020. The Commission received 64 annual reports from investor-owned utilities, cooperatives and municipal utilities and the EWR staff found them to be compliant with the Act. Michigan utility providers have consistently reached their annual required EWR targets, and in most cases continue to exceed the statutory requirement. Providers met a combined average of 165 percent of their electric energy savings targets and 142 percent of their natural gas energy savings targets. EWR programs across the state accounted for electric savings totaling over 1.58 million MWh (megawatt hours) and natural gas savings totaling over 6.17 million Mcf (thousand cubic feet) for program year 2020.

PA 295 requires that all programs be cost effective by meeting the Utility System Resource Cost Test (USRCT). All programs offered during 2020 were cost effective and had a USRCT score of 1.00 or greater. The electric utility providers averaged a UCT score of 4.1 and the natural gas providers averaged a UCT of 2.3 for 2020.

## Introduction

Section 97(4) of the Act requires that the Michigan Public Service Commission (MPSC or Commission) submit to the standing committees of the Senate and House of Representatives with primary responsibility for energy issues an annual report that evaluates and determines whether Subpart C of the Act has been cost-effective. The report may include any recommendations of the MPSC for energy waste reduction legislation.

In 2020, there were 6 natural gas investor-owned utilities (IOU), 8 electric investor-owned utility providers, 10 electric cooperatives, and 40 municipal electric utilities with approved plans, for a total of 64 natural gas and electric Energy Waste Reduction (EWR) Plans. For the 2020 program year, 54 of the 64 utilities in Michigan formally coordinated the design and implementation of their EWR programs through a collaborative process in order to reduce costs, create consistency, and improve understanding of program offerings. The remaining 10 utilities independently administered their own programs. To the extent feasible, the utility providers that independently administered their programs tried to align with the program design offered by the collaborated utility providers' programs to improve customer and contractor participation and satisfaction.

## Program Offerings

All natural gas and electric utility customers in Michigan are able to participate in energy efficiency programs offered by their local utility. New programs and emerging technologies are continuously being introduced as pilot programs, which enable utilities to phase in the implementation of new technologies, expand existing programs, and offer new features. In general, individual programs are divided into two broad categories: residential and commercial/industrial. Residential programs consist of six major categories: lighting; heating, ventilating and air conditioning (HVAC); weatherization; energy education; appliance recycling; and pilot programs. Commercial/Industrial offerings include prescriptive and custom programs. Prescriptive programs provide rebates for specific equipment replacement such as lighting, boilers, pumps, and compressors. Custom programs generally provide a rebate per kWh of electricity savings or per Mcf of natural gas savings for a comprehensive system or industrial process improvement.

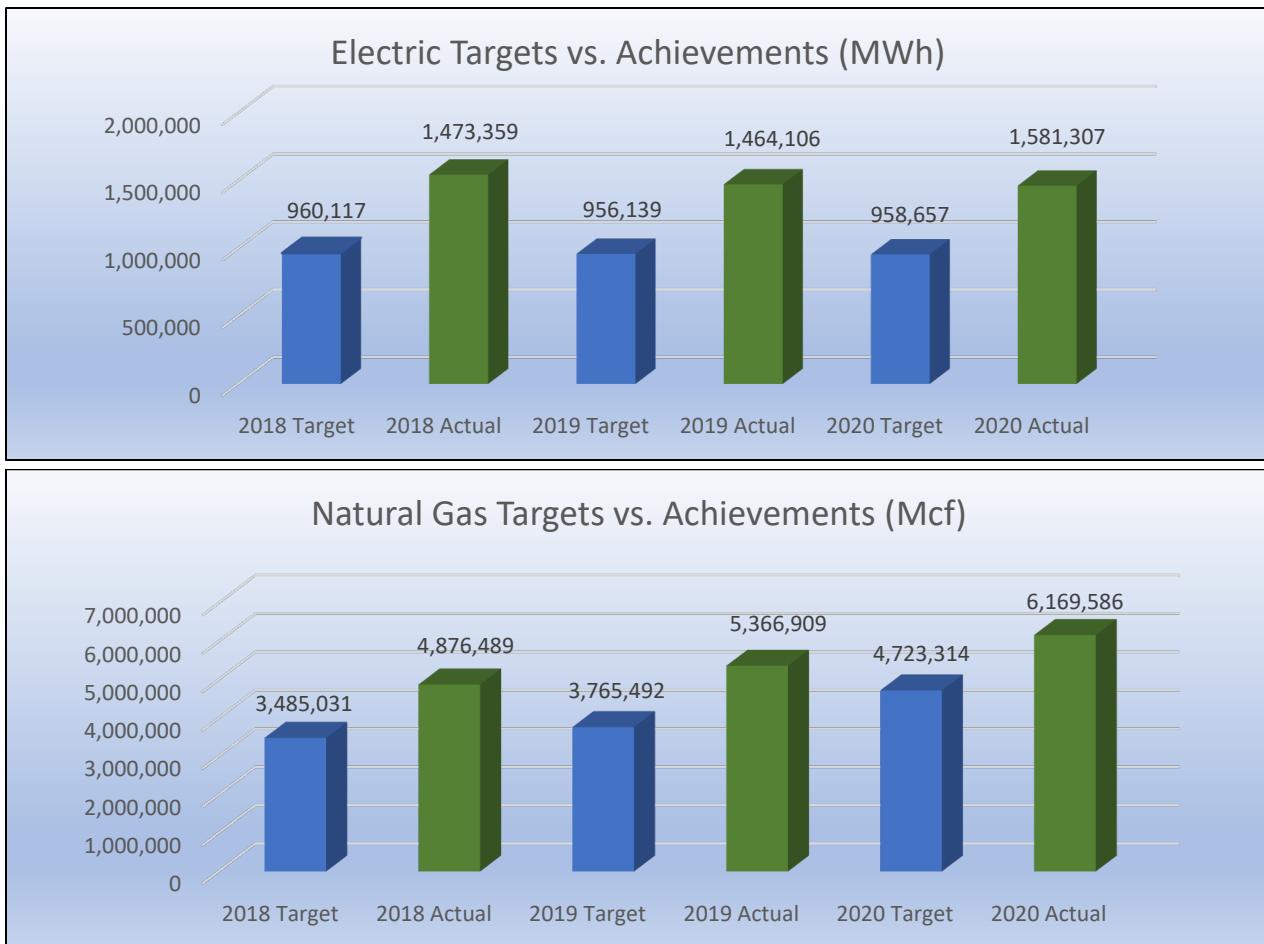
## Energy Savings Targets

Section 77 of PA 342 provides annual energy savings targets for electric and natural gas utilities. The minimum savings targets are based upon a percentage of previous calendar-year retail sales for each utility. Utility providers successfully complied with the energy savings targets laid out in the Act. EWR programs across the state accounted for annual electric savings totaling 1.58 million MWh, and natural gas savings totaling 6.17 million Mcf, both being significant increases over last year. In 2020, electric EWR programs and measures had an average measure life of 9.58 years for electric programs and 12.14 for natural gas programs, equating to a realized lifetime savings of 15.15 million MWh for electric programs and measures and 74.90 million Mcf for natural gas programs and measures. *Figure 1* below depicts the electric and gas savings target versus the

achievements for the past three years. 2020 savings equate to electric utility providers achieving 165% of the legislative target and, natural gas utility providers achieving 142% of their legislative target.

These energy savings targets continue for investor-owned utilities whose rates are regulated by the Commission and are complemented by the requirement under Act 341 of 2016 that EWR be included in utility integrated resource planning and the incentives included in PA 342 of 2016 for EWR performance above the statutory minimum. Legislatively required energy savings targets will not apply to municipal and cooperative electric utilities after December 31, 2021. Absent such a requirement, it is unclear whether the customers of these utilities will continue to receive program offerings and rebates from their electric providers or realize the many benefits EWR programs can provide for their homes and businesses.

**Figure 1**  
**Electric and Gas Targets vs. Actual Savings Achieved**



## EWR Surcharges and Program Funding

The Act requires utilities to specify necessary funding levels for the activities being proposed. Commission-regulated utility providers can recover their EWR program expenditures through a customer surcharge approved by the Commission. Surcharges approved by the Commission are assessed on either an energy usage basis or a per meter basis. Residential customers are charged based on their energy usage. The average electrical residential customer pays around \$2.02 per month for the electric EWR surcharge, and around \$2.11 per month for the natural gas EWR surcharge. Generally, a commercial and industrial electric or a natural gas customer's EWR surcharge is based on a per meter charge. *Figure 2* depicts the actual expenditures for the past three years by utility provider type.

**Figure 2**  
**Energy Waste Reduction Program Funding**

Utilities	Annual Expenditures		
	2018	2019	2020
Electric Companies			
Electric IOU's	\$217,647,289	\$233,597,233	\$276,722,438
Electric Cooperatives	\$9,140,151	\$7,867,637	\$7,761,216
Electric Municipalities	\$9,868,295	\$9,242,472	9,835,981
Total Statewide Electric	\$236,655,735	\$250,677,342	\$294,319,635
Gas Companies			
Total Statewide Gas	\$96,176,172	\$95,956,353	\$125,101,565
Total Gas and Electric	\$332,831,907	\$346,633,695	\$419,421,200

## Program Benefits

In 2020, aggregate EWR program expenditures of \$419 million by all the natural gas and electric utilities in the state were estimated to result in lifecycle savings to customers of \$1.342 billion. For every dollar spent on EWR programs in 2020, customers should realize benefits of \$3.20. Data provided to the Commission in EWR provider annual reports indicated that EWR resources were obtained at a cost of \$25.58/MWh, which is less expensive than supply side options such as new natural gas combined cycle generation costing around \$40/MWh.<sup>1</sup>

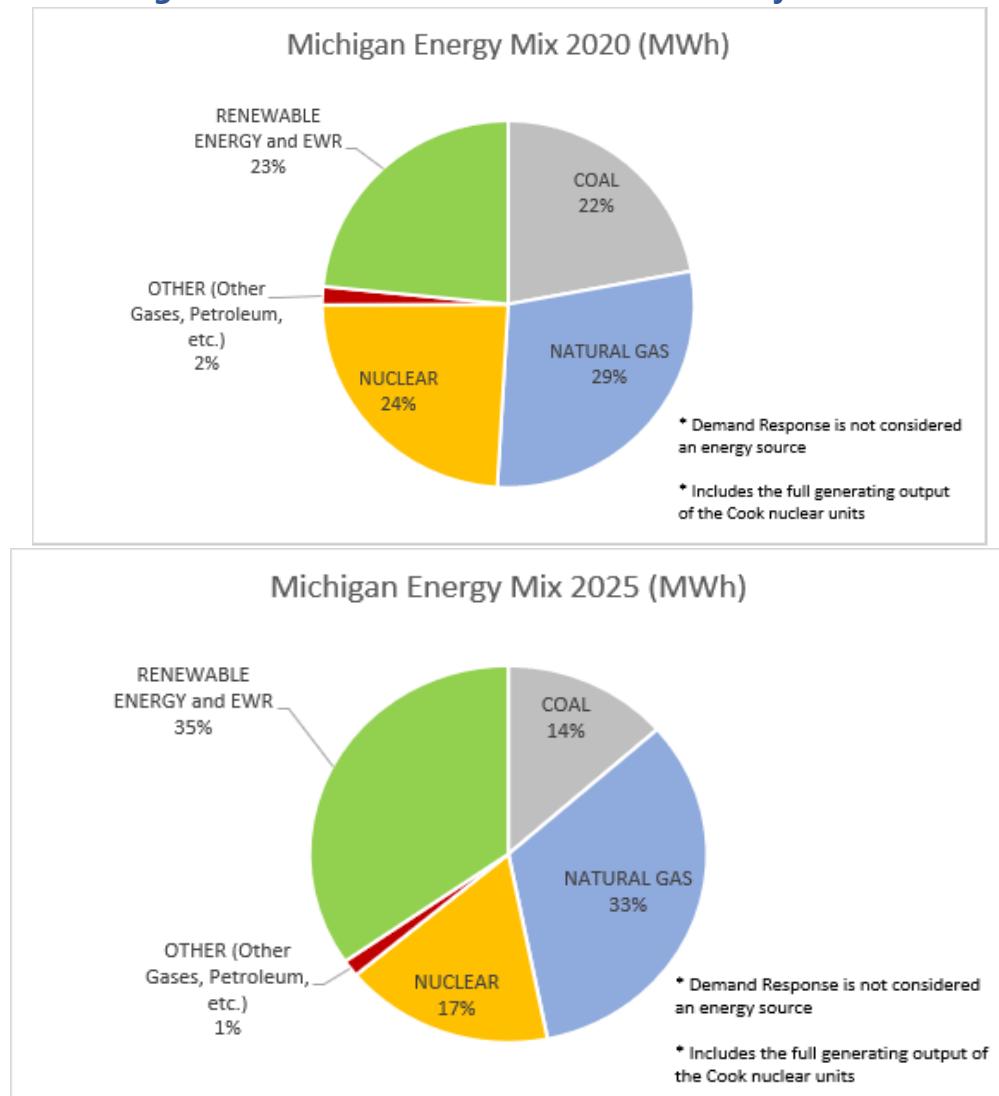
The benefits of the EWR program will flow to customers over the lifespan of the efficiency measures implemented during the year. The direct benefits are reduced utility costs, which would otherwise be recovered in utility rates. These savings are the avoided costs to utilities and are calculated based on the energy savings identified for individual energy efficiency measures as reflected in the Michigan Energy Measures Database. The cumulative reduction in customer demand for electricity is expected to result in reduced cost of service along with reducing the need to build new electric generation plants. Since the passage of the Act in 2008, the use of coal in the state has been reduced greatly through coal power plant closures. EWR helps to fill the gap in meeting customer needs. According to the goal described in the Act, not less than 35% of this state's electric needs should be met through a combination of energy waste reduction and renewable energy (RE) by 2025.<sup>2</sup> The charts in *Figure 3* show that the state is well on its way to achieving that goal.

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<sup>1</sup>Source: [U.S. Energy Information Administration Annual Energy Outlook 2020](#)

<sup>2</sup> Source: [PA 295 as amended by PA 342](#)

**Figure 3**  
**Michigan's Electric Resource Mix - 2020 vs. Projected 2025**



*Includes the full generating output of the Cook nuclear units. \*Demand Response is not included in the EWR percentage.*

There are other benefits of electric EWR programs besides delaying or eliminating the need for building new generation; they also reduce emissions of environmental pollutants from existing generation. Both the electric and natural gas EWR programs also result in hundreds of millions of dollars in fuel cost savings that would have otherwise been spent in order to import energy into Michigan. EWR programs also increase demand for energy efficiency equipment and installations from local businesses. In addition, the benefits flowing to Michigan utility customers via the EWR programs should help reduce utility uncollectible expenses and lower operating costs for Michigan businesses and institutions. Other non-energy benefits for Michigan residents are improvements in health and safety, and increased comfort in their homes and businesses.

## Cost Effectiveness

There are many ways to calculate the cost effectiveness of utility energy efficiency programs. Simply stated, the overall benefits should outweigh the overall costs. The Act requires providers to meet the Utility System Resource Cost Test (USRCT or UCT). Utilities assess the cost effectiveness of their programs during the plan development stages. The UCT score compares the program administrator costs to supply-side resource costs. It ensures the benefits outweigh the energy and capacity related avoided costs, the program overhead costs, and the incentives paid to the customer by the utility. A score of 1.0 or greater in this test (benefits are equal to or greater than the costs) indicates a cost-effective program.

Section 97 of the Act requires the Commission to evaluate and determine whether the energy waste reduction programs were cost-effective on an overall portfolio level. The electric utility providers programs collectively had an average UCT score of 4.1, while the gas utility providers programs averaged a score of 2.30.

## State Administrator: Efficiency United

The Act created an option for electric and natural gas providers to offer energy waste reduction services collectively through a program administrator. Section 91(6) requires the administrator to be a 'qualified nonprofit organization' selected by the MPSC through a competitive bid process. To fund the program the administrator is paid directly by the participating providers using funds collected from customers.

Michigan Community Action (MCA) is under contract as the State Administrator and its team of contractors operate under the brand name of Efficiency United (EU). This contract runs through December 31, 2025. Services and offerings are similar to, and coordinated with, those of other providers around the State. The EU program has successfully been able to provide programs and achieve savings targets equivalent to those implemented by independent utility providers.

## Programs for Low-Income Customers

The Act speaks to the importance of EWR program offerings for low-income residential customers. All customer classes must contribute proportionally to low-income program costs based on their allocation of the utility's total EWR budget. Low-income EWR programs are excluded from the requirement to meet the UCT or cost-benefit test. In 2020, \$56,664,759 was spent on programs for income qualified customers. This is significantly higher than years past, and the conversations and relationships within the Energy Waste Reduction Low-Income Workgroup are greatly credited for this increase. Michigan customers at or below 200% of the federal poverty level qualify for these programs. Implementation of these programs generate different challenges. The uniqueness of single-family homes and multi-family housing, along with the funding necessary to achieve savings for these customers, requires the utilities to continually assess and redesign the program offerings, including working collaboratively with diverse low-income stakeholder organizations.

## Energy Waste Reduction Low-income Workgroup

In 2017, the Energy Waste Reduction section began exploring the creation of an EWR Low Income Workgroup with the idea of bringing together EWR staff with other state agencies, utilities, and stakeholder groups to better address low-income specific energy waste reduction approaches and create new innovative initiatives that can reduce the cost of the energy burden on Michigan's low-income customers and communities.

The EWR Low Income Workgroup began in April of 2018. It is a stakeholder driven collaborative with the aim of combining energy efficiency with weatherization, housing, health, and environmental and economic expertise to have more meaningful and longer lasting impact on the State's most vulnerable citizens than would be possible when working independently.

Participants and stakeholder involvement in the Low-Income Workgroup continued to grow throughout 2020. There are currently well over 140 distinct organizations that are represented in the workgroup, a significant increase over previous years. All of Michigan's regulated utilities participate, as do numerous municipal and cooperative utilities. Also active in the workgroup are many of Michigan's state agencies including several separate divisions of the Michigan Department of Health and Human Services, the Michigan State Housing Development Authority (MSHDA), and the Michigan Department of Environment, Great Lakes and Energy.

In order to develop a more 'deliverable' oriented environment, the stakeholders of the EWR Low-income Workgroup continue to identify areas from which they establish subcommittees focused on specific deliverable topics. In 2020, these topic areas included identifying solutions to further developing a weatherization work force, initiating a project with Michigan 211 that coordinates and directs energy assistance with other disparate low-income program offerings, and the project group addressing health and safety issues inherent in low-income housing stock continued to work on outreach and engagement and how to best address those needs. The difficulty in the Weatherization Assistance Program's (WAP) deferral issues also became a significant topic to be addressed. Because of restrictions attached to the WAP funding source, customers in homes with roofing, asbestos, electrical wiring, or moisture infiltration issues cannot receive the needed weatherization work until those structural or hazardous problems are mitigated. Mitigation efforts are often prohibitively expensive, and therefore, are left unaddressed. Utilities began to examine the efficacy of pilot programs that would assist in these mitigation efforts, and despite the issues raised by the COVID-19 pandemic, they were greatly impactful. These programs will be continued past 2020.

Other areas of discussion in 2020 included environmental justice and community engagement by the NAACP in Grand Rapids as well as the Grand Rapids Zero Cities Project. Discussions on housing equity and energy burden were also introduced and continue today. We also saw a significant amount of work in 2020 that focused on how to best continue to respond to the COVID-19 pandemic. The Workgroup met many times to discuss issues such as energy affordability and accessibility, and the Workgroup continues to address those issues today.

Contrary to expectations, utility EWR low-income programs were not impeded by the COVID-19 pandemic. Most utilities were able to reexamine and incorporate adjusted program delivery best practices, and the results were that most utilities exceeded their own pre-pandemic projected targets. The stakeholders of the Low-income Workgroup worked closely with utility counterparts to ensure the safe and effective continuation of low-income program delivery.

Another successful outcome from the Low-income Workgroup was the enhancement of energy assistance program eligibility. During the pandemic shutdown it became readily apparent that a significant number of Michigan residents would be in need of energy and financial assistance. One way to aid in this was to explore expansion of program eligibility. In collaboration with utilities and low-income stakeholder groups, energy assistance eligibility requirements, such as Area Median Income and the ALICE (Asset Limited Income Constrained Employed) thresholds, were put into use and continue to be utilized or expanded upon.

Details about the work of the EWR Low-income Workgroup, low-income collaborative projects, and stakeholder information can be found on the [EWR Low-income Workgroup webpage](#).

## Self-Directed EWR Program

Under Section 93 of the Act, large electric customers that meet certain eligibility requirements may create and implement their own customized EWR plan consistent with the provisions of the Act, and thus be exempt from paying an EWR surcharge except for a portion to support the costs of income qualified programs. Electric customer eligibility to participate in the self-directed EWR plans is determined by the customer's annual peak demand. The Act allows customers with at least 1 MW aggregated annual peak demand in the preceding year within a service provider's territory to participate. The number of customers enrolled to self-direct their own EWR program has continued to drop, with 9 customers self-directing in 2020 (as shown in *Figure 4*). Energy savings for these self-directed large commercial and industrial customers are reported to their utility provider and the utility provider includes these savings in their annual savings achievements.

**Figure 4**  
**Number of Self-Directed Large Commercial and Industrial Customers**

Provider	Peak Year 2010	Previous Year 2019	Current Year 2020
DTE Electric	26	4	3
Consumers Energy	30	4	3
Efficiency United	11	3	3
Cooperatives	3	0	0
Municipals	9	0	0
<b>TOTAL</b>	<b>79</b>	<b>11</b>	<b>9</b>

## **MPSC Energy Waste Reduction Collaborative**

In Case Numbers U-15805 and U-15806, the Commission directed the MPSC Staff to establish a statewide energy waste reduction collaborative which requires the participation of all natural gas and electric providers and allows the opportunity for a variety of additional stakeholders to participate. A key goal of the collaborative is to reduce the extent and cost of the formal contested hearing process through stakeholder consensus and industry peer review of standards and procedures. The collaborative identifies recommendations for improving EWR plans for all providers, offers program evaluation and support, and develops any necessary redesign improvements to energy efficiency programs. Select members of this group meet to serve as the Michigan Energy Measures Database Technical Subcommittee.

## **Michigan Energy Measures Database**

Measurement and verification are essential tools in improving Energy Waste Reduction programming. In 2009, Michigan began with a foundation database of projected energy savings that was derived from other states' experiences. By incorporating data derived from Michigan weather stations, program implementation, and specialized evaluation studies, the database evolved into the Michigan Energy Measures Database (MEMD).

The objective of the MEMD is to provide users with accurate information on energy savings associated with technologies or measures that could be used in energy efficiency programs. The MEMD is also used to prioritize the allocation of funding toward these possible measures. For this critical function, it is important to utilize Michigan-specific data in the MEMD. Thus, under the direction of Commission Staff, stakeholders are participating in monthly collaborative meetings developing recommendations to update this database. The collaborative has developed an annual process for selecting the highest priority measures to update with Michigan specific data. For the selected measures, field studies are undertaken in customer homes and businesses using data collection equipment, such as light loggers and sub-metering, and engineering analysis to obtain reliable measurement of the actual energy consumption.

## **EWR Credit Tracking System**

Section 87 of the Act states, "(T)he commission shall establish an energy waste reduction credit certification and tracking program. The certification and tracking program may be contracted to and performed by a third party through a system of competitive bidding." Because there was already an established program for tracking renewable energy credits through the Michigan Renewable Energy Credit System or MIRECS, a credit tracking program established and contracted with APX, implementing a tracking program for EWR credits was efficiently and effectively implemented through APX. All regulated electric and natural gas utility providers have been able to input their credits earned and utilized to meet compliance into the system since 2017. This system now provides for a more formal process to track EWR credits earned, utilized, transferred

to renewable energy credits and, if a balance exists, carried-forward to be used if needed to meet a maximum 1/3<sup>rd</sup> of the subsequent year's compliance as allowed by the Act.

## Revenue Decoupling

PA 295 authorizes the Commission to establish a revenue decoupling mechanism (RDM) upon request by those natural gas utilities that have implemented an Energy Waste Reduction program. The Commission may authorize an alternative mechanism that it deems to be in the public interest. Through the contested case process, a utility company can request a RDM to help recover lost sales from required programs or services that reduce that company's overall revenue.

In 2016, PA 341 gave authorization to the Commission to approve an appropriate RDM, for an electric utility with less than 200,000 customers in this state, that adjusts for decreases in actual sales compared to the projected levels used in that utility's most recent rate case. Those incremental decreases in actual sales must stem from implemented energy waste reduction programs and measures.

## Financial Incentive Mechanism

Section 75 of PA 342 allows Commission-regulated utilities to request a financial incentive payment for exceeding the energy savings targets each plan year. There are currently six utilities that have requested and received approval for a financial incentive mechanism. The Act allows for an incentive of up to 20 percent of program spending for exceeding the statutory requirements. Each utility must first exceed the required savings level plus meet a set of utility specific program metrics to receive their award. An example of a program metric is meeting a required level of lifetime savings, which requires the utilities to focus on measures that have longer lives for their customers, such as high-efficiency furnaces, air sealing, and insulation. Other metrics involve greater low-income savings targets or spend, and multi-family home initiatives. The development of the incentive metrics takes place in the Company's biennial plan filing and serves to improve the measures and program offerings for the customers. Offering energy efficiency incentives to utility companies puts energy efficiency on par with supply-side investments. Michigan's utilities strive to achieve the maximum incentive allowed under the Act and their customers reap the benefits with more robust program offerings and increased spending on low-income programming. The performance incentive has proven to be a driver in the success of Michigan's EWR programs since 2009 and encourages utility management support for these programs.

## On Bill Financing (OBF)

In 2016, PA 295 was amended to allow utilities with rates regulated by the Commission to establish residential "on-bill financing" programs. These programs allow customers to pay back the cost of energy efficiency improvements over time on their utility bill. In December 2018, the Commission finalized the formal rulemaking process to amend the Commission's Consumer Standards and Billing Practices for Electric and Natural Gas Service to include on-bill financing provisions (MPSC

Case No. U-20152). To date, no investor-owned utility offers an on-bill financing program. In addition, PA 408 of 2014 authorized municipalities served by a municipal electric utility to offer on-bill financing programs. A number of Michigan municipal electric utilities, including the Holland Board of Public Works and Traverse City Light & Power, have partnered with Michigan Saves, a non-profit green bank, in establishing these programs.

## Conclusion

Energy Waste Reduction programs have seen many successes due to continued efforts by utilities and their EWR contractors and implementation allies. The 2020 program year was no exception, with utilities meeting or exceeding energy savings targets. The amendment of PA 295 in 2016 supports and acknowledges that utility EWR programs provide value to Michigan residents and businesses.

The work of the EWR Workgroups and Collaboratives and the ongoing pilots and evaluation activities provide strong support for the evolution of the EWR programs and the ability to continue to achieve the statutory requirements in a cost-effective manner. The EWR programs continue to attract a wide range of customers from low-income residential to large scale commercial and industrial businesses. Increasingly, large customers are relying on the utility programs instead of operating their own self-direct program.

There are broad benefits of the EWR programs. The cost of reducing energy waste is much lower than procuring other energy resources. Customers who participate in the program directly benefit by seeing reduced energy use and lower bills. Other benefits, such as reduced emissions and fuel cost savings, provide value to all Michigan customers. The EWR programs have led to significant job creation in Michigan by companies that implement the programs for utilities, and energy efficiency contractors that install improvements for customers. The EWR programs have also prompted the increased availability of higher efficiency equipment for homes and businesses. EWR can also increase the comfort, health, and safety of homes and businesses, and helps energy providers reliably meet the energy needs of their customers.

The Commission continues to explore ways to improve the savings and increased benefits of the programs for large and small utilities, while adapting the scope of the programs to meet the needs of all customers. This was displayed during the utility companies' integrated resource planning (IRP) processes. Those filings saw a number of utilities committing to greater EWR programming. Consumers and DTE have committed to a step increase of up to 2% energy savings by 2021. Alpena and Northern States Power (Xcel Energy) will increase to 1.3% and 1.5% respectively by 2021, while the Upper Peninsula Power Company (UPPCO) will increase to 1.75%. The requirement under PA 341 of 2016 that IRPs expressly include EWR in the planning process, and the requirement that an IRP must represent the most reasonable and prudent means of meeting the electric utility's energy and capacity needs in order to be approved has helped drive cost-effective EWR utilization above and beyond the minimum requirements included in statute. The combination of the statutory target, a robust approach to utility resource planning, and incentives

that help to align the interests of utilities with those of their customers, are all helping to increase the utilization of EWR in Michigan.

In addition, the Commission also notes that in 2020, Governor Whitmer issued Executive Directive (ED) 2019-12<sup>3</sup>, committing Michigan to join the United States Climate Alliance, a bipartisan coalition of governors from 25 states pursuing the goals of the Paris Agreement. Michigan will pursue at least a 26-28% reduction below 2005 levels in greenhouse gas emissions by 2025 and accelerate new and existing policies to reduce carbon pollution and promote clean energy deployment. This commitment will encourage and support the commitments made by Michigan's utilities to continue to improve and increase their EWR program offerings to Michigan's utility customers. In 2020, Governor Whitmer also signed Executive Order (EO) 2020-182<sup>4</sup>, Executive Directive 2020-10<sup>5</sup> to develop the MI Healthy Climate Plan. This resulted in the creation of the Council on Climate Solutions housed within the Department of Environment, Great Lakes, and Energy. The 14 appointed council members worked closely with subgroups that focused on Building and Housing; Energy Intensive Industries; Energy Production, Transmission, Distribution, and Storage; Natural Working Lands and Forest Products; and Transportation and Mobility. These workgroups met throughout 2021 and draft recommendations have now been issued for comments.<sup>6</sup> Many of the recommendations include increased EWR program access for Michigan residents and businesses along with an emphasis on recommendations to assist disparate communities in these endeavors. Specific recommendations, including the role of cost-effective EWR programs towards meeting the Governor's carbon reduction goals, are likely to be contained in the final MI Healthy Climate Plan, which is slated to be completed in April 2022. That said, the Commission notes that the sunset of the EWR requirements for electric municipalities and cooperatives – in the absence of well-designed programs offered by those providers - make it more difficult and costly to meet both the existing statutory goal of meeting 35% of Michigan's energy needs through a combination of EWR and renewable energy, as well as any carbon reduction goals.

Michigan's utility providers, Commission Staff, and other interested parties maintain an active pursuit of cleaner, more affordable energy through EWR plans and programs.

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[3 Whitmer - Executive Directive 2019 - 12 \(michigan.gov\)](#)

[4 Whitmer - Executive Order 2020-182: Council on Climate Solutions \(michigan.gov\)](#)

[5 Whitmer - Executive Directive 2020 - 10 \(michigan.gov\)](#)

[6 Draft-MI-Healthy-Climate-Plan 745872 7.pdf \(michigan.gov\)](#)