

EAAC: Data Analysis & Regulatory Review Recommendations

9/15/2022



DARR Journey






Current Commission Reporting


Quarterly Reports (QR)


- Submitted to the Commission 45-days after the end of the reported quarter.
- U-18120
- Data represents both residential and nonresidential customers

U-20757 Data (U-20757)


- Submitted to the Commission 10-days after the end of the month.
- Data represents residential customers


 Customer Payment Performance (QR & U-20757)


 Payment Plans (QR & U-20757)


 Winter Protection Plan (QR & U-20757)

 Alternative Shutoff Protection Plan (QR & U-20757)

 Shutoff Information (QR & U-20757)

 Restoration Information (QR & U-20757)

 Customer Service (QR)

 Informal Hearings (QR)



Recommendations: Data Collection

Combine both data collection reports (Quarterly and U-20757), separated by residential and non-residential customers.

- Reports submitted monthly or quarterly

Customer Payment
Performance

Shutoff Information

Restoration
Information



Recommendation: Data Collection Customer Payment Performance

Customer Payment Performance

- Report dollar amounts in the actual accrued aging bucket (currently reported in the oldest bucket)
- ADD additional bucket to reflect written off aged dollars (varies but commonly 150+ days)
- Data presented in zip code or census tract data

Questions:



Recommendation: Data Collection Shutoff Information

Shutoff Information

- Report both the total of customers disconnected during the month and cumulative total through end of month
- ADD reporting metrics for medical & critical care on the number of denials
- Data presented in zip code or census tract data

Questions:



Recommendation: Data Collection Restoration Information

Restoration Information

- ADD number of customers restored within 5 days after disconnection
- ADD restoration rate
 - Restored within 5 days
 - Restored during the month

Questions:



Part 7: Billing Rule Protections

Energy Assistance & Shutoff Protection Programs for Residential Customers

- Listing & Notice of energy assistance programs (R 460.128/129)
- Medical Emergency (R 460.130)
- Critical Care Shutoff Protection (R 460.130a)
- Low-income Winter Protection Plan (R 460.131)
- Senior Winter Protection (R 460.132)
- Military Customer Protection (R 460.133)
- Extreme Weather Condition Policy (R 460.134)



Recommendations: Protections Part 7

Most rules
are based on
statutes

Medical
Emergency

Critical
Care

Medical
Certification
Form

Low-
Income
Winter
Protection
Plan

Extreme
Weather
Policies



Recommendation: Medical Emergency

If a customer or a member of the customer's household has a medical condition, as defined and certified by a physician or public health official on a commission-approved medical certification form*, that will be **AGGRAVATED** by the lack of utility service.

Eliminate the cap on the number of days a customer or household may receive protection

Extend the number of days for recertification

Allow other professions other than a doctor or nurse to certify patient's medical certification form

Require utilities to go to the Commission when a medical certification form is denied

* Medical form can be found via utility and Commission website

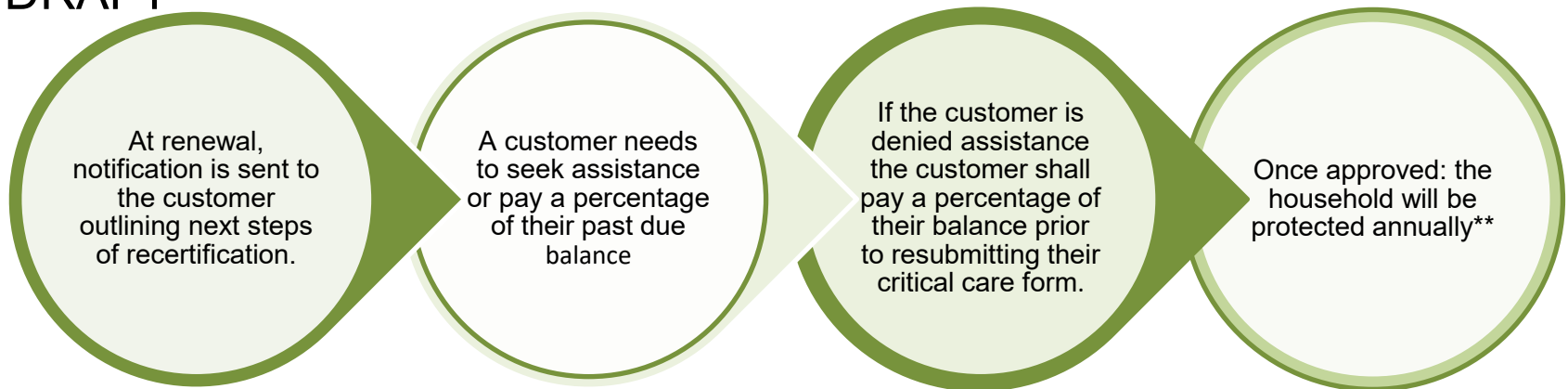


Critical Care Shutoff Protection

Any customer due to an inability to pay a utility bill, who requires, or has a household member who requires, home medical equipment or a life support system, and who, on an annual basis, provides a commission-approved medical certification form* from a physician or medical facility to the utility identifying the medical equipment or life support system and certifying that an interruption of service would be **IMMEDIATELY** life-threatening.

If critical care ends, the customer or occupant of household needs to notify the utility of the status change.

DRAFT



Notes:

- Need to determine what percentage the customer will be required to pay.
- This will allow DHHS to provide assistance for critical care customers.

* Medical form can be found via utility and Commission website



Recommendation: Medical/Critical Care: Medical Hold Form

ADD on the Medical Certification Form

- Add a header on the top of Pg. 4 to include Patient Name (Section 1 name)



Section 3: the following information is to be completed by a Physician or Public Health Official	
Patients Name: (same as Section 1)	Birthdate:
Please Select One of the following conditions by checking one of the boxes below:	
<input type="checkbox"/>	Medical Emergency Patient <i>Patient suffers from an existing medical condition that will be aggravated by the lack of utility service. A utility shall postpone disconnection for no longer than 21 days if the customer or member of customer's household has a certified medical emergency. Please note, additional certificates are required to extend postponement of shutoff. Postponement of shutoff for medical emergency conditions shall not exceed 63 days.</i>
<i>I certify that the patient has the following medical emergency condition(s) that will be aggravated by the loss of electricity and/or natural gas service.</i>	
Condition(s):	
Equipment:	Time Period:

* Medical form can be found via utility and Commission website



Recommendation: Low-Income Winter Protection Plan

REDO: The new baseline would be the current offering of Shutoff Protection Plan for ALL utilities

(recommend to Commission petitioning the change to the legislators)



Extreme Weather Conditions

Each utility must have an extreme weather condition policy, which are outlined in each utilities tariff and under U-20148, addressing:

Standardize Terms

- Criteria or factors for suspension during extreme HOT weather
- Criteria or factors for suspension during extreme COLD weather

Prohibit Shutoffs

- Heat : above 90 degrees, include heat index
- Cold: Under 32 degrees, plus wind chill
- Immediately before an extreme event & weekend



Recommendation: Part 7 General

Require customers to communicate with the utility when they get into crisis under Part 7

- Allows utilities a chance to customize and offer different payment plans or assistance before the arrears are unsustainable

If a customer engages in fraud relating to Part 7 of the rules, that customer is no longer eligible for these protections.

Changing requirements within the Home Heating Credit mandating customers to be placed on the Winter Protection Plan

- Offer other payment plans to meet customers needs



Questions? Comments? Concerns?

DARR Suggestion Box

(<https://www.michigan.gov/mpsc/commission/workgroups/energy-affordability-and-accessibility-collaborative>)





Upcoming ...

- Next meeting:
October 20th at 10:00 a.m. – 12:00 p.m.

Topics:

- Recommendations Continued
- Suggestions





Appendix

- R 460.151 Quarterly Report Rule Requirements
- U-20757 Monthly Report Requirements



Quarterly Report – Billing Rules

R 460.151 Reporting requirements.

Rule 51. A utility shall file with the commission quarterly reports that disclose all of the following:

- (a) The payment performance of its customers in relation to established due and payable periods.
- (b) The number and general description of all complaints registered with the utility.
- (c) The number of shut off notices issued by the utility and the reasons for the notices.
- (d) The number of hearings held by the utility, the types of disputes involved, and the number of complaint determinations issued.
- (e) The number of written settlement agreements entered into by the utility.
- (f) The number of shut offs of service and the number of reconnections.
- (g) Any other customer service quality information requested by the commission staff.

[R 460.101 to R 460.169 \(1\).pdf](#)



U-20757 Monthly Report Requirements Continued

Alternative Shutoff Protection Plan Information

- Number of customers on an alternative Shutoff Protection Plan.
- Number of customers who defaulted on their alternative Shutoff Protection Plan.

Shut off Information

- Total number of disconnect notices sent.
- Total number of customers disconnected for non-payment, unauthorized use, safety, access and any other reason.
- Total number of disconnections prevented or customer restoration due to medical emergency and critical care.
- Total number of seniors coded as of the end of the month.

Restoration Information

- Total number of customers restored after the cause has been cured or payment arrangement has been entered.
- Total number of customers restored due to the customer receiving assistance..



U-20757 Monthly Report Requirements

Customer Payment Performance

Number of customers who are behind 6-30 days, 31-60 days, 61-90 days and 91+ days after the bill due date.

Amount in arrears of customers who are behind 6-30 days, 31-60 days, 61-90 days and 91+days after the bill due date.

Payment Plan Information

Number of customers on a payment plan and amount owed.

Winter Protection Plan (WPP) Information

Number of customers on WPP.

Number of customers who defaulted on WPP.