

Comments of DTE Electric and DTE Gas on the New Technology and Business Model Collaborative June 23, 2021

DTE Electric and DTE Gas (DTE or the Company) appreciate the Staff's efforts in bringing together the diverse technology topics and discussions of the collaborative. The Company specifically notes the closing session, which provided the opportunity to explore the emerging key ideas and takeaways highlighted by stakeholders over the course of the collaborative. In reflection on the discussions, the barriers and possible solutions matrices provided by Staff, and looking ahead to the Staff's draft report later this summer, DTE offers two comments for consideration.

- Context of the Staff report discussion and recommendations. The collaborative offered a wealth of discussion and information for stakeholders and Staff to consider, much of which is captured in the matrices from the June 16th meeting. The matrices developed by Staff are a helpful tool to structure stakeholder inputs, however the specific opportunities and solutions are not always clear in their source or in what is being recommended. As part of any recommendations included in the draft report, the Company requests that they be linked back to the relevant sections of the collaborative summary and issue matrices. This will help assist all stakeholders in understanding the context and framing of the recommendations. It will also provide clarity as to which barriers and possible solutions are being included as informational of the discussion and which are being elevated as inputs into a Staff recommendation.
- Scope of recommendations. Stakeholder comments throughout the collaborative, which were revisited though the discussions on June 16th, highlight a potentially very broad range of possible solutions to what each stakeholder perceives as the key barriers. Proposed solutions include additional studies, additional pilots, technology focused economic incentives and promotion beyond market economics, and changes to legislation, among others. DTE encourages Staff to consider how recommendations benefit continued, holistic improvements to the safety, reliability, and affordability of the energy service provided to Michiganders alongside our commitment to the continued support for and deployment of clean energy resources. The Company also notes that the Staff's recommendations should be within the Commission's purview to implement. There are a number of specific barriers and possible solutions that are legislative, market, vendor, or code-driven that are outside of the regulatory framework and may be best addressed in another forum.

The Company looks forward to reviewing the Staff's report in August and providing thoughtful and constructive feedback on the specific topic areas and Staff recommendations at that time.