

Oracle Comments on Staff Draft Report
MI Power Grid: Energy Programs and Technology Pilots
August 17, 2020

Joy,

I hope you're doing well and had a good weekend!

Thanks so much for sending us the Utility Pilot Best Practices and Future Pilot Areas draft report. I reviewed it in detail and thought I would share the following brief comments and suggested edits:

- The report looks great. It is clearly written and the recommendations include a variety of useful elements. I think the proposed pilot definition and objective criteria for evaluating pilot proposals are appropriate.
- Page v - "Lastly, Staff . . ." should probably be a new paragraph
- Page 3 - Electric Power Sector chart is missing the bar for Coal (-36%)
- "Utility decisions can have equity implications." The Equity Considerations section is an important inclusion with appropriate and actionable recommendations.
- Typo page 15 - "bene" to "been"
- Typo page 17 - "methods ." to "methods."
- Page 27 - "A review of energy efficiency behavioral programs found few conducted rigorous experimental and quasi-experimental studies when estimating savings" - I was surprised by this statement and would be interested to learn what EE behavioral programs were reviewed and are being referenced here. I assume pilot programs only, correct? Opower's behavioral programs utilize experimental design as a standard practice to calculate savings with a high degree of accuracy.
- Typo page 30 - "not limited" to "not be limited"
- Typo page 30 - "pilots results" to "pilot results"
- Typo page 33 - "FIOA" to "FOIA"
- Typos pages 38-39 - "innovative platform" to "innovation platform"
- Typo page 39 - "experience regulatory team" to "experienced regulatory team"
- Page 45 - "Staff recommends objective criteria for evaluating pilot best practices when pilots are proposed in future rate cases." Pilots may be proposed in other cases besides rate cases, correct? If so, removing the word "rate" would likely make more sense here.
- Regarding the Staff recommendations in this report, is there a clear case or process through which the MPSC will adopt these recommendations? For example, how exactly will the recommended definition of "pilot" be adopted? Who should be responsible for developing the online Michigan pilot directory? (Or if that is undetermined, how should it be decided?) I think the report would be improved with a clearer articulation of the action items that will result from this report to help ensure its recommendations are implemented.

I hope these comments are helpful. Please be in touch anytime.

Thank you,

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