

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

Dear Joy

Thank you for the opportunity to review the Energy Programs and Technology Pilots draft report. The document contains an excellent summary of the meetings, and is very comprehensive. Indeed, we were all challenged with an on-line format, but I feel the report did a great job of capturing the most important aspects of the various presentations.

My main comment is focused on the "why" any technology pilot should be supported. The Stakeholder report explains clearly "how" to structure a pilot test, and gives a step-by-step listing for objectives that any given pilot test should meet. But the Report appears to under-emphasize one of the core tasks for the Workgroup as defined by Order U-20645; namely, to "*<propose> objective criteria for Commission/Staff to use when evaluating future proposed utility pilots*" (Section 1.2 of the Report).

As you point out in Section 4.2, individual Michigan utilities currently are in the lead when it come so defining pilot testing. But it is not clear if these pilot tests are consistent with an overall strategic vision for the next-generation grid. In my mind, any pilot (irrespective of who proposes the work) should be tested against the MPSC's strategy for a next-generation energy framework in Michigan. But where are the objective criteria defined for any test to meet?

Marco Padula's presentation on REVconnect program gives a good example of how NY State defined specific goals based on clear REVconnect Policy Objectives (Section 2.2.2-3). These objectives included items like new business models, testing of new technologies, reduction of carbon emissions, etc. To my knowledge, the Michigan Commissioners have not yet defined these goals.

I'll note that Section 5.4 gives a hint that the MPSC needs to establish priorities, but frankly, this is at the end of the report and will likely be lost to the average reader. You state "*Staff recommends more detailed foundations goals underpinning future energy pilots...*" on page 45, and also summarize the recommendation in the Executive summary, but in a rather tepid fashion (and as the fifth of five items).

My recommendation is to strongly emphasize the need for MPSC to clearly define the goals and policy objectives for Michigan's energy framework. Once the high-level goals/objectives are in place, it will be much easier to define criteria that any proposed pilot test must meet. Because of its importance, I suggest putting this recommendation as a primary item in the report, namely #1 in the Executive Summary and prominently in the body of the proposal. In terms of an example of sustainable power guidelines, you may also highlight PowerPath DC (Section 2.2.2-1) as an example of how another PSC has prioritized energy innovations.

Of course, it only makes sense to also offer guidance how exactly the MPSC can define the goals and objectives. I believe that this is an excellent opportunity for the MiPowerGrid report to recommend an executive committee be established to make recommendations to the MPSC similar to those defined by REVconnect in NYS. This committee should include a broad range of stakeholders, and be well-versed in current and emerging energy technologies.

Thank you for your hard work with the Energy Programs and Technology Pilots workgroup.

Regards

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