



Date: Aug 17, 2020

*Via email*

Michigan Public Service Commission  
7109 W. Saginaw Highway  
Lansing, MI 48917

**Subject: Comments regarding the Draft Staff Report “Utility Pilot Best Practices and Future Pilot Areas” for the Energy Programs and Technology Pilots Workgroup**

WattTime is a California non-profit founded in 2014 that provides research, education, and assistance on the environmental benefits of electricity use timing, and advocates for a data-driven approach to solving environmental problems. WattTime

WattTime appreciates the opportunity to have presented at the MI Power Grid workgroup meeting on May 28, 2020 and submits the following comments regarding the draft staff report.

**1. Correction with regard to WattTime’s presentation**

On page 26 para 2, the following line *“In the case study of the Massachusetts Clean-Peak Standard, the use of inadequate proxy measures actually caused pilots to have effects counter to initial goals”* should read “In the case study of the California Self-Generation Incentive Program (SGIP) the use of inadequate proxy measures actually caused the energy storage program to have effects counter to initial goals”.

**2. Addressing climate and environmental impacts requires direct measurements of emissions**

The MI Power Grid initiative has the stated goal to *“maximize the benefits of the transition to clean, distributed energy resources for Michigan residents and businesses.”*



The draft Staff report also notes that *“The initiative is designed to maximize the benefits of the transition to clean, distributed energy resources for Michigan residents and businesses.”* and that the utility pilots will need to address climate and environmental impacts (page 4).

However, it should be noted that distributed energy resources (DERs) do not necessarily result in clean energy benefits or reduce emissions if appropriate metrics are not selected. In WattTime’s presentation to the workgroup, reference was made to several case studies related to energy storage programs in other states which either led to actual increase in emissions, or where WattTime analysis showed that the programs could lead to an increase in emissions if implemented without direct measurement of emissions.

WattTime supports future pilot projects that have climate and environmental goals, and will continue to participate in this workgroup to assist the Commission in designing a data-driven approach to emissions reduction from DERs.

Submitted by

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