



Making the Most of Michigan's Energy Future

Technical Standards for Electric Service Workgroup Meeting #3

U-20630

February 12, 2020



MPSC

Michigan Public Service Commission

Meetings Recap

December 3, 2019

Background/Introduction

Parts of Standards

Multi-State Review

Staff Areas of Interest

Assignment (comments/meter type data)

January 8, 2020

Summary of Comments

Multi-State Review – Staff

Multi-State Review – Public Sector Consultants

Cybersecurity Update

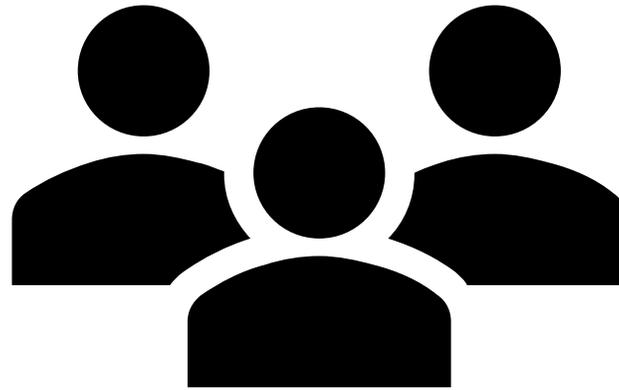
Focus Areas

Assignment (comments related to “Focus Areas”)

Today's Agenda

Agenda Items*		
9:00 am	Welcome, Introduction, and Recap	Tayler Becker, Electric Operations Section
9:15 am	January 24, 2020 Comments Summary	Tayler Becker, Electric Operations Section
9:30 am	Hold: Vegetation Management and Definitions Presentations	Joe Eto, Lawrence Berkeley National Laboratory
10:30 am	Break	
10:45 am	Cybersecurity Update	Brian Sheldon, Energy Security Section
11:15 am	Technical Standards for Electric Service: Areas of Focus Update	Tayler Becker, Electric Operations Section
11:45 am	Closing Statements, Next Steps, and Assignment	Tayler Becker, Electric Operations Section
12:00 pm	Adjourn	

January 24, 2020 Meeting #2 Comments



Michigan Electric Cooperative Association (MECA) - Comments

- R 460.3411 – promotes the Commission’s policy goals and promotes efficiency and economy. There is a longer history to the rule than ABATE suggests and is a product of the Commission’s experience over many decades with inherent problems in the regulated utility market
- R 460.3411 – rule is promulgated pursuant to the Commission's authority and does not limit customer choice. Courts have reviewed the Commission’s authority without raising any doubt about its legality
- R 460.3411 – ABATE’s proposed amendments should be rejected and rule 411 should be kept as is to promote orderly expansion of facilities and services to prevent inefficiency and waste

Association of Businesses Advocating Tariff Equity (ABATE) - Comments

- R 460.3411 – incorporates comments submitted on December 20, 2019 and requests to be involved in the Rule 411 focus area
- R 460.3408 – temporary service and “in excess of any salvage realized” should be defined. The rule is vague and needs to be clarified
- R 460.3503 – workgroup needs to consider further defining “reasonable reserve for emergencies” similar to how MISO defines the term “reserve margin”
- R 460.3601 – asks the group to consider if the rule is unreasonable since it permits a utility to charge a customer for testing a meter only to check if the meter is functioning properly

DTE Energy (1 of 6) - Comments

- “Sustained Interruption” - definition should align with IEEE Standard 1366-2012 and the definition of “interruption” from the Service Quality and Reliability Standards. Also recommends “sustained interruption” be consistent between both rulesets
- “Momentary Interruption” - should be defined as “the brief loss of power delivery to one or more customers for a duration of five minutes or less”
- “Planned Interruption” - should be defined as “the loss of electric power to one or more customers that results from the intentional disabling of a component’s capability to deliver power, done at a pre-selected time, usually for the purposes of construction, preventative maintenance, or repair”

DTE Energy (2 of 6) - Comments

- “Major Service Interruption” - should be defined as “a loss of service for 5% or more of the utility’s customers due to an extreme weather event or electrical system component failure”
- DOE’s definition should be used for “AMI/solid state meters”
- Proposes an alternate (to January 12, 2020 submission) definition for “serious injury” to mean “any injury or illness to an employee that resulted in a fatality or injury resulting in inpatient hospitalization”

DTE Energy (3 of 6) - Comments

- R 460.3804 – recommends employee accident and non-employee accident reporting
- Emergency Response Plan (ERP) means “the Company’s plan to address an emergency event, where an electrical system component failure or extreme weather event can adversely impact the integrity of the electric system”
 - Cyber and physical response plans should be excluded from this definition
- R 460.3411 – though complicated, the level of detail is necessary for determining the appropriate and cost-efficient manner for electric distribution service

DTE Energy (4 of 6) - Comments

- R 460.3701 – language regarding frequency should be removed and add “[t]he frequency shall be kept within limits as defined by MISO.”
- Cybersecurity - open to continuing stakeholder discussions and is preliminarily in agreement with Staff’s recommendation. Annual assessments should rely on the NIST framework

DTE Energy (5 of 6) - Comments

- R 460.3505 – notifications are already sent to customers for planned tree trimming work. Notifications and audits for tree trimming are better suited for distribution plans, not Technical Standards. If notification and audit language is added, DTE provided draft language stating “[f]or all planned (non-emergency) tree trimming work, the utility shall attempt to provide notification to impacted customers prior to trimming and perform audits of the tree trimming work following completion”
- Recommend that electric companies provide the Commission with an annual summary of the MIOSHA 300 Log including injury type and number of incidents. The full MIOSHA log is extensive

DTE Energy (6 of 6) - Comments

- Emergency Response Plans (ERP) should not be made public. Plans should be provided verbally or through other confidential channels to Staff on a biennial basis with the following components
 - Preparation of resources and predictive storm models
 - Communications plans
 - Communication with customers during an emergency
 - Ensuring safety of the public and employees
 - Outage assessments, after-action reviews (AAR), and improvements
 - Staff requested topics

Consumers Energy (1 of 5) - Comments

- “Sustained Interruption” – defines as an interruption lasting longer than 5 minutes.
- “Momentary Interruption” – preliminarily defines as an interruption lasting less than 5 minutes
- “Planned Interruption” – defines as a pre-scheduled interruption where customers are notified in advance of the interruption

Consumers Energy (2 of 5) - Comments

- Reporting of incidents to the MPSC should be consistent with MIOSHA Part 11
- “AMI/Solid-State Meters” – there are different definitions by different entities such as FERC, EEI, etc. MPSC definition should be consistent with these
- Meter Location – utilities should dictate the location of the meter based on ease of access. Company recommends a dedicated subgroup be created to further maturity to suit all utilities

Consumers Energy (3 of 5) - Comments

- Cybersecurity – no concerns at this time with what is being proposed
- Reporting of OSHA incidents should align with OSHA/MIOSHA regulatory reporting requirements in place and should be requested by MPSC from MIOSHA with information protection maintained
- R 460.3411 – revisions could undermine longstanding principals that utilities have come to understand. This understanding provides for efficient and economic application of the rule

Consumers Energy (4 of 5) - Comments

- R 460.3504 - preventative maintenance reporting is appropriately provided in distribution plans and is based on Consumers' own experience. If a focus area is developed, Consumers would welcome the opportunity to participate
- R 460.3505 – 100% pre-clearing notification are not always necessary and would conflict with easements, permits, agreements, or court orders. 100% post-trimming audits would result in significant cost increases and are not necessary to ensure that the work performed meets specifications

Consumers Energy (5 of 5) - Comments

- R 460.3701 – suggests eliminating the second sentence of the rule. The rule would read “[t]he standard frequency for alternating current systems shall be 60 Hertz”
- R 460.3804 – incident notification involving contract personnel should be limited to information known at the time. Information flow from fatalities and injuries is often limited immediately

Michigan Electric & Gas Association (MEGA) (1 of 4) - Comments

- Urges Staff to consider that the impact of additional requirements on small utilities is not always the same as with large utilities
- Definitions for “serious injury”, “accidents”, and different metering types should be added for appropriate reference
- “Serious injury” – should consider OSHA definition that requires reporting for hospitalization, amputation, or loss of an eye

Michigan Electric & Gas Association (MEGA) (2 of 4) - Comments

- Meter testing and inspection – a subgroup will be key along with making sure the various types of meters and technologies are accommodated. MEGA members will not all be transitioning to AMI
- Cybersecurity – supports revising or eliminating the term “electric provider” in subsection 3 so it is clear that standards apply to distribution utilities, not alternative electric suppliers
- Cybersecurity – proposes adding reference to the Michigan Data Breach Law in the standards

Michigan Electric & Gas Association (MEGA) (3 of 4) - Comments

- Accident and incident reporting – utilities are already required to report to OSHA and could report the same event. Creating a new structure with different definitions and reporting requirements is unnecessary and duplicative
- Vegetation management/O&M – are all standard components of rate cases which are filed on a fairly regular basis. Additional reporting would be duplicative. MEGA could work with Staff to provide pieces that are not provided today
- Advanced technologies – AMI deployment is still fairly new and knowledge will evolve over time with more experience

Michigan Electric & Gas Association (MEGA) (4 of 4) - Comments

- R 460.3411 – the driver is unknown for changes to the rule. There are no outstanding concerns that would warrant revisions. Consideration of changes raises concerns
- R 460.3701 – agrees to remove the reference to clocks connected to the system
- Momentary outages – not all utilities have AMI to track and report these. These are not necessarily a sign of poor performance. The most appropriate place for rules related to outages is the Service Quality and Reliability Standards

Questions



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Technical Presentation

Vegetation Management Practices

Reliability Definitions

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Lawrence Berkeley National Laboratory

U-20630: Technical Standards for Electric Service Workgroup

Michigan Public Service Commission, Lansing, MI

February 12, 2020



Preface

- LBNL is a US Department of Energy (DOE) multipurpose science laboratory managed by the University of California
- The Michigan (MI) Public Service Commission (PSC) requested that DOE support LBNL to provide technical expertise to staff for the MI Power Grid initiative in two areas related to reliability and resilience:
 - Technical Standards for Electric Service
 - Service Quality and Reliability Standards for Electric Distribution Systems
- LBNL's role is to provide focused technical information in response to requests from MI PSC
 - LBNL participation is not as an advocate
 - LBNL will not be a party to and will not provide testimony in the MI PSC rulemaking proceedings that are anticipated to start in Fall 2020

Part I:Vegetation Management Practices

1. What purposes do they serve?
2. What are practices in other states?
3. Considerations that may be relevant to Michigan

Vegetation Management Practices

What purposes do they serve?

Interruption Cause	2014	2015	2016	2017	2018	5-Year Average
Vegetation	45.21%	37.44%	48.80%	37.55%	49.5%	43.9%
Equipment Failure	17.5%	19.6%	12.8%	16.3%	15.5%	16.2%
Transmission Line	6.3%	13.7%	7.2%	13.6%	6.0%	9.3%
Station	9.8%	13.3%	5.5%	10.9%	7.2%	9.2%
Vehicle Accident	4.9%	4.5%	9.7%	5.8%	5.0%	6.1%
Unknown	4.1%	3.8%	7.4%	4.3%	4.6%	4.9%
Lightning	4.8%	3.7%	3.7%	2.8%	2.1%	3.4%
Scheduled	1.2%	1.7%	2.9%	3.6%	5.3%	3.0%
Remaining	4.2%	1.1%	1.0%	3.8%	3.8%	2.7%
Animal	2.1%	1.2%	1.0%	1.4%	1.0%	1.3%

Increasing electric service reliability is a major driver for improving vegetation management practices
 Increasing public safety is also mentioned as a driver

Vegetation Management Practices

What are Practices in Other States?

- Most states (including Michigan) have adopted the National Electrical Safety Code Rule 218
“Vegetation management should be performed around supply and communication lines as experience has shown to be necessary”
- Some states have additional rules that direct specific practices regarding
 - Notification to customers
 - Reporting to the PUC
 - Volumes or cycles of activity
 - Clearances that must be maintained
 - Audits by the PUC
- **The following slides contain selected examples that illustrate practices in other states – they are not practices that LBNL endorses or is suggesting for adoption in Michigan**

Vegetation Management Practices

Notification to Customers

“When trimming trees and other vegetation in electric line right-of-way maintenance, the utility shall make a reasonable attempt to contact the landowner a minimum of twenty-four hours prior to beginning of work on the landowner's property. This contact may take the form of a written notice delivered to the landowner's residence, a telephone call to the landowner, or an in-person contact. Reasonable effort shall be made by the utility to accommodate a landowner's desire to be present when work is done on his or her property. Emergency repairs are exempted from this notification requirement.”

Wisconsin PSC 113.0510

https://docs.legis.wisconsin.gov/code/admin_code/psc/113/V/0510



Vegetation Management Practices

Reporting to the PUC

“Each electric distribution company shall submit to the department an updated line maintenance plan no later than January 1, 1990 and January 1 of each even numbered year thereafter.”

“Each such line maintenance plan shall include procedures and schedules for the inspection, testing, and maintenance, including clearances, of poles, wires, conduits or other fixtures along public highways or streets for the transmission or distribution of electric current, owned, operated, managed or controlled by such electric distribution company.”

Connecticut 16-32g

https://eregulations.ct.gov/eRegsPortal/Browse/RCSA/Title_16Subtitle_16-32g_HTML/



Vegetation Management Practices

Volumes/Cycles

“Each utility shall, at a minimum, perform vegetation management on a 4-year cycle, unless needed otherwise or unless otherwise ordered by the Commission. The utility may request an exemption from this requirement by submitting an alternative(s) to the 4-year cycle to the Commission in its annual vegetation management plan for review and hearing.”

Oklahoma 165:35-15-25

<https://casetext.com/regulation/oklahoma-administrative-code/title-165-corporation-commission/chapter-35-electric-utility-rules/subchapter-25-operations-requirements-for-utilities/part-3-reliability-of-service-and-reliability-program/section-16535-25-15-vegetation-management-plan>

Vegetation Management Practices Clearances

“Where overhead conductors traverse trees and vegetation, safety and reliability of service demand that certain vegetation management activities be performed in order to establish necessary and reasonable clearances the minimum clearances set forth in [Table 1, Cases 13 and 14](#), measured between line conductors and vegetation under normal conditions, shall be maintained.”

California GO95

https://www.cpuc.ca.gov/gos/GO95/go_95_rule_35.html

https://www.cpuc.ca.gov/gos/GO95/go_95_table_1.html

Vegetation Management Practices Audits

“The ICC Staff is required to perform an assessment of each utility's reliability report, at least every three years per 83 Ill. Adm. Code 411.140. The assessments include a review of the annual reliability reports and evaluate the reliability performances.”

<https://www.icc.illinois.gov/industry-reports/electric-reliability>

Vegetation Management Practices Considerations (I)

- Do existing standards provide adequate incentives for vegetation management to improve reliability?
 - SAIDI and SAIFI targets, for example, are ultimate measures of reliability performance
 - Such targets provide utilities with discretion in the means by which targets are achieved
 - This discretion enables the utility to trade-off the costs and efficacy of different approaches for improving reliability

Vegetation Management Practices Considerations (2)

- If not, what are the obstacles to improvements in vegetation management and are prescriptive practices likely to overcome them?
 - There may be two distinct obstacles – both are financial in nature
 - First, are the budgets authorized for vegetation management adequate to implement the practices that are prescribed
 - Second, are there incentives for utilities to underspend authorized budgets
 - To address these latter incentives, some states have implemented “tracking accounts” that return unspent budget to ratepayers

Vegetation Management Practices Considerations (3)

- What prescriptive standards may be warranted?
 - What are the costs to implement standards versus their expected impact on reliability?
 - The costs may include both direct costs to the utility and indirect costs to the Commission, among others

Part 2: Reliability Definitions

- The Technical Standards for Electric Service refer to three reliability terms that are not currently defined in the rules: “sustained interruptions,” “planned interruptions,” and “major interruptions”
- This presentation reviews closely related concepts that are formally defined in the IEEE Guide for Electric Power Distribution Reliability Indices (aka “IEEE Standard 1366-2012)

Reliability Definitions

Sustained Interruption

IEEE Standard 1366

Sustained interruption: Any interruption not classified as a part of a momentary event. That is, any interruption that lasts more than five minutes.

Reliability Definitions

Planned Interruption

IEEE Standard 1366

Planned interruption: The loss of electric power to one or more customers that results from a planned outage.

The key test to determine if an interruption should be classified as a planned or unplanned interruption is as follows: If it is possible to defer the interruption, then the interruption is a planned interruption; otherwise, the interruption is an unplanned interruption.

Reliability Definitions

Major Event

IEEE Standard 1366

Major Event: Designates an event that exceeds reasonable design and or operational limits of the electric power system. A Major Event includes at least one Major Event Day.

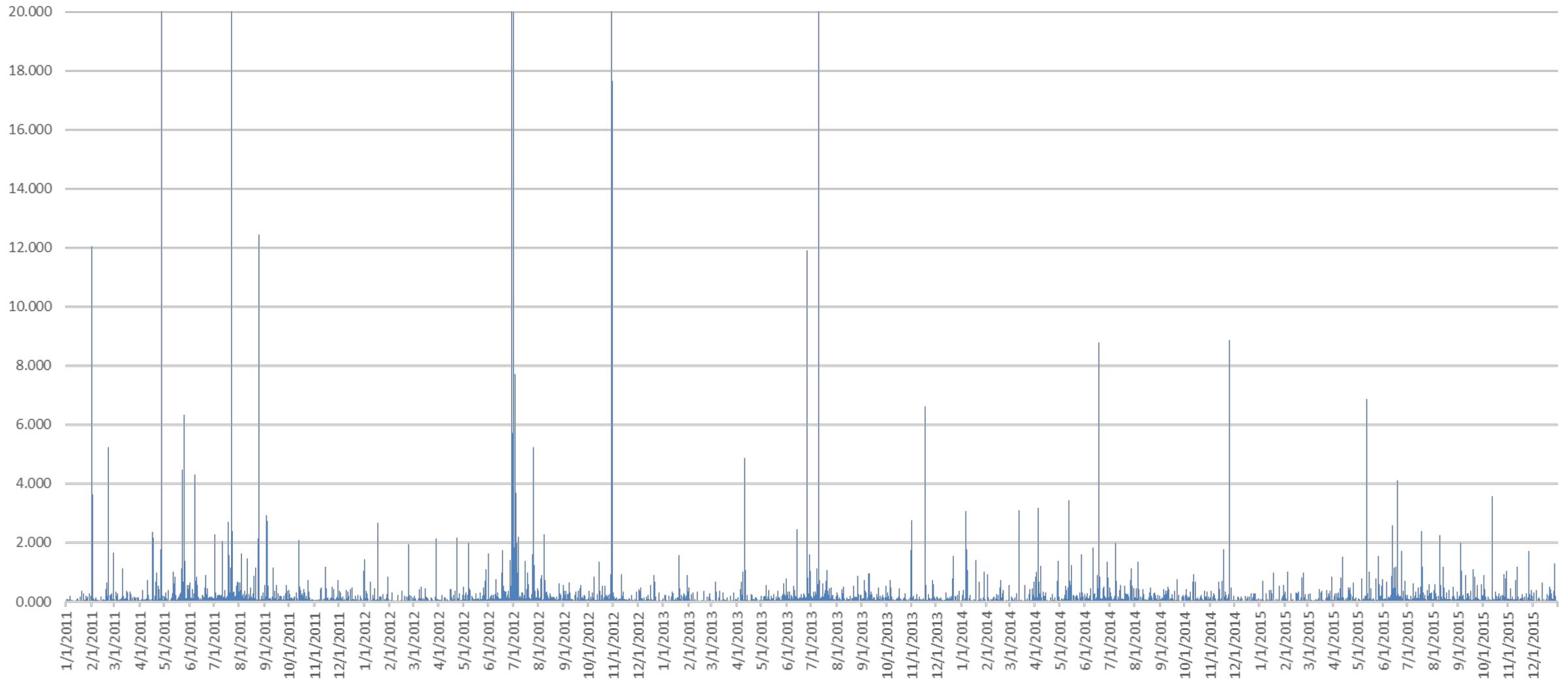
Major Event Day (MED): A day in which the daily system System Average Interruption Duration Index (SAIDI) exceeds a Major Event Day threshold value.....

Statistically, days having a daily system SAIDI greater than TMED are days on which the energy delivery system experienced stresses beyond that normally expected (such as during severe weather). Activities that occur on Major Event Days should be separately analyzed and reported.

IEEE Standard 1366 – Major Event Day

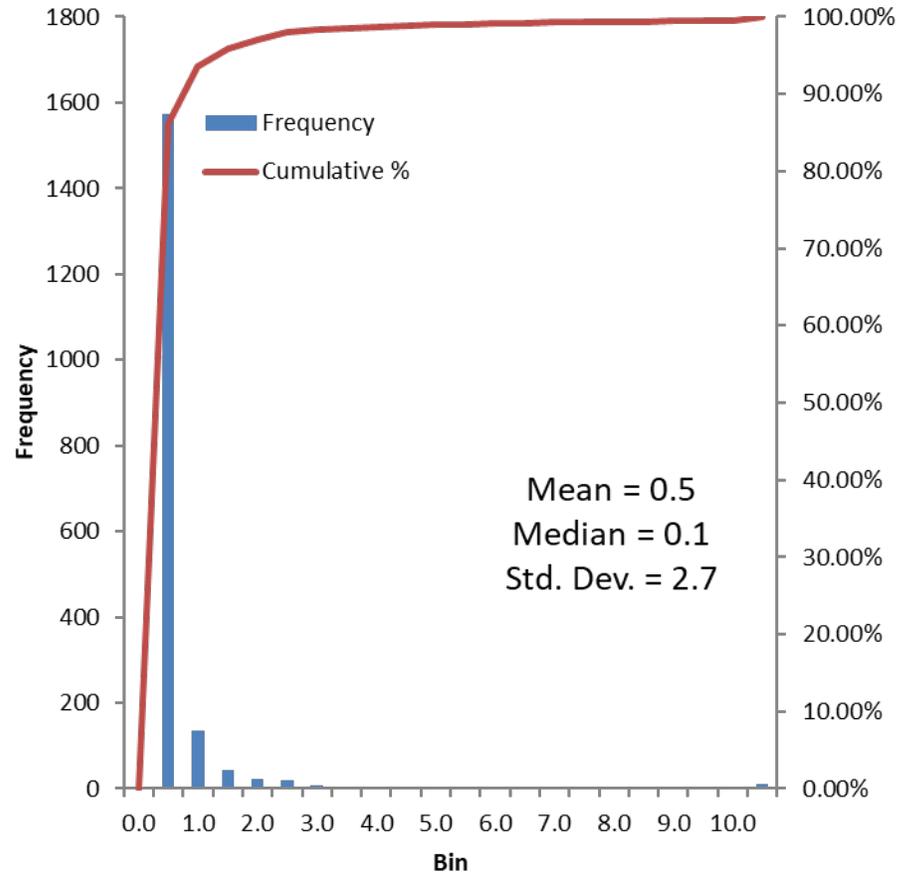
- First developed in 1998 to define reliability indices; amended in 2003 to add a consistent approach for segmenting Major Event Days (amended again in 2012; MED definition unchanged)
- Uses $2.5 \cdot \beta$ to estimate a threshold daily SAIDI, T_{med} , above which a Major Event Day is identified
 - $T_{med} = \exp(\alpha + 2.5\beta)$
 - β = log-normal standard deviation
 - α = log-normal statistical mean
- For a ***normal*** distribution:
 - Multiplying β (the standard deviation) by 2.5 covers 99.379% of the expected observations (assuming a one-sided confidence interval)
 - For a year of daily observations, this translates to an expectation of 2.3 Major Event Days per year
- *But, not all utility daily SAIDI data are distributed “normally”*

Daily SAIDI for 5 years (2011-2015)

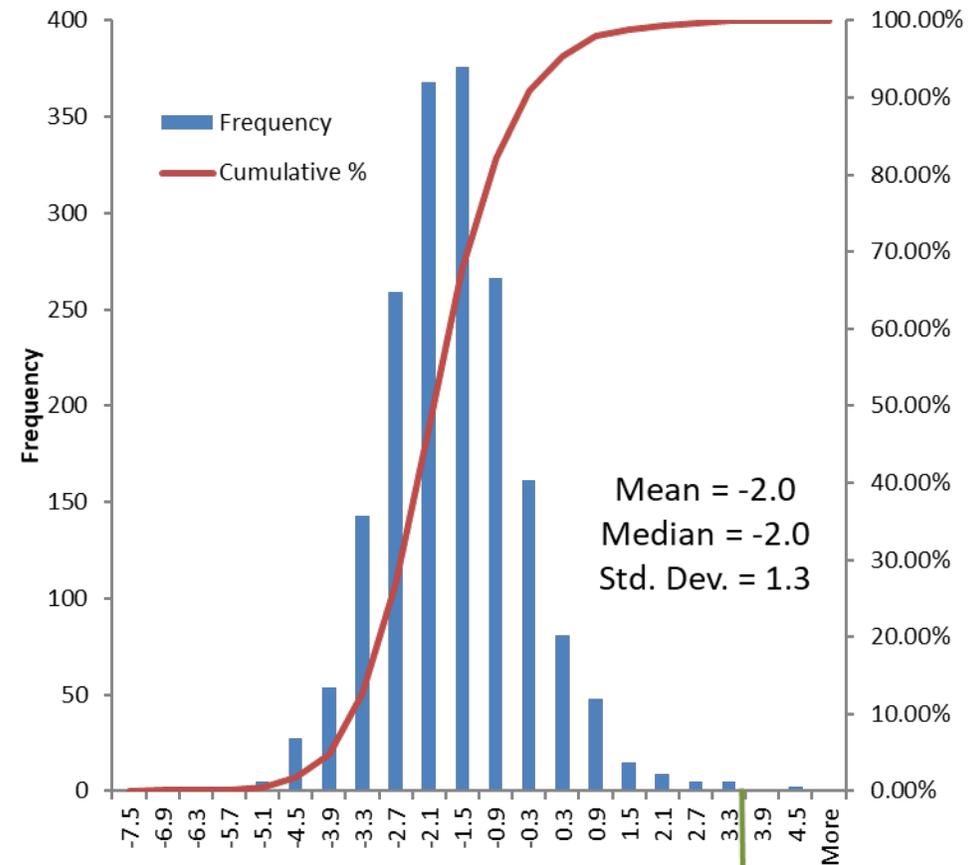


Daily SAIDI Re-Ordered from Lowest to Highest

Histogram of 2011-2015 Daily SAIDI



Histogram of 2011-2015 Daily Ln SAIDI

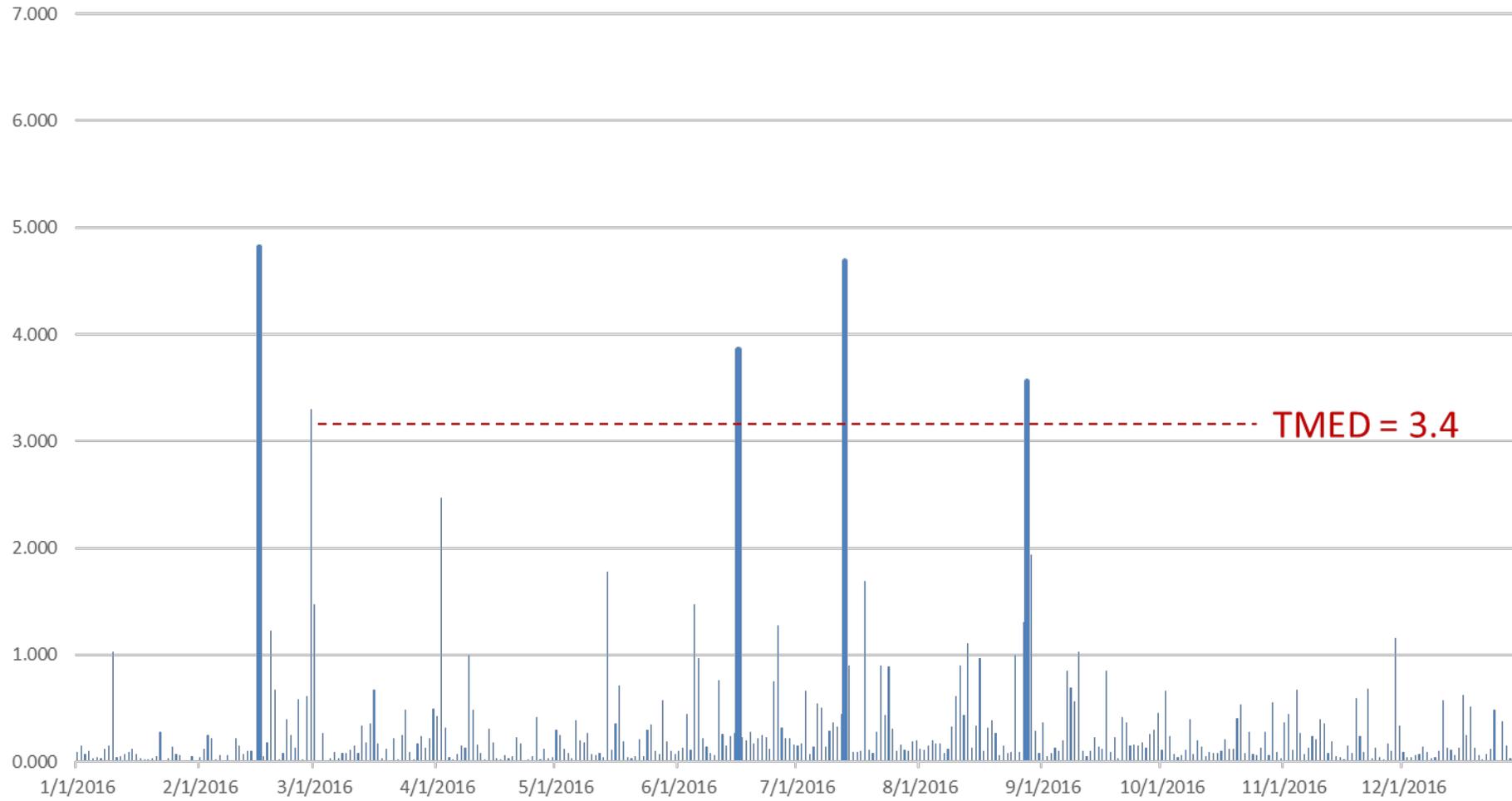


$$T_{med} = e^{(\text{mean} + (2.5 * \text{std. dev.}))}$$

$$T_{med} = 3.4$$

Daily SAIDI for 2016 → 4 MEDs

U1 Year 2016 Daily SAIDI



4 MEDs in year 2016:

1. Feb 16
2. Jun 16
3. Jul 13
4. Aug 28

Perspectives on Definitions

- Industry-standard definitions are national in scope and, in the case of IEEE Standards, they are developed and updated regularly through open forums
- Michigan-specific definitions can recognize situations or circumstances that are unique to Michigan
- The uses or intended applications of defined terms should guide what definitions may be needed or are most appropriate for Michigan

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Break



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Making the Most of Michigan's Energy Future

Cybersecurity Update

February 12, 2020



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Recap – Rule 205

Rule 205 Requirements:

- Provide the MPSC staff with a written or oral annual report about the utility's cybersecurity program. *R 205(1)*
- Notify the MPSC staff if the utility experiences a cybersecurity incident that meets one or more defined thresholds. *R 205(2)*

Staff not currently evaluating changes to the substance of Rule 205, but changes may be warranted for clarity.

Changes Under Consideration – Rule 205

Change #1: Electric “Provider” vs “Utility”

Change #2: Reworked Reference to MI Data Breach Law

Comment from MEGA:

- Change #1: “MEGA supports such a clarification.”
- Change #2: “...would not be burdensome.”

Gas Technical Standards: U-20608

January 23, 2020 Commission Order:

Change # 1 

Change # 2 

Takeaway: For consistency and clarity, Staff will be supporting equivalent changes to the Electric Technical Standards.

Recap – New Cyber Rule

Purpose: Establish baseline cybersecurity requirements

Proposed Framework

- **Type 1 Requirement:** Have procedures to accomplish a stated cybersecurity objective, and follow them.
- **Type 2 Requirement:** Complete a specific cybersecurity task within a specified timeframe.
- **Compliance Mechanism:** Annual attestation by an officer of the utility who oversees the cybersecurity program.

Early Feedback – New Cyber Rule

Consumers Energy: “...has no concerns at this time with what is being proposed.”

DTE Electric: “...is preliminarily in agreement with Staff’s recommendation to rely on attestation for compliance.”

DTE Electric: Staff’s proposal “should rely on the National Institute of Standards and Technology (NIST) framework to ensure that the standards, guidelines and best practices to manage cybersecurity risk stay current.”

Latest Progress – New Cyber Rule

Goal: Conduct outreach with utility technical staff

Status: Staff held discussions with staff from CE, DTE, & I&M

Goal: Continue drafting proposed rule language

Status: Straw proposal largely complete, consistent with aforementioned framework

Goal: Determine mechanism to collect feedback and work on rule language

Status: Will conduct future work via a cyber subgroup

Next Steps – New Cyber Rule

Today – Staff compiling email list of utility cyber SMEs, regulatory affairs staff, and association contacts

This week – Send out introductory email w/ doodle poll for future cyber subgroup meeting date(s)

- if not received and want to participate, email me

Late Feb-Early March – First subgroup meeting

- Straw proposal will be circulated to subgroup
- Staff will provide an overview of proposed rule, solicit feedback regarding high-level issues.

Also Coming Down the Pike...

What: MPSC partnering with NARUC to host cyber-focused commission staff from approximately 10 countries

When: Early May (2-3 days)

Staff's Ask: Staff likely to reach out to utility SMEs for assistance with programming

- Facility tour?
- Presentation?
- Q&A session?

Questions



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Making the Most of Michigan's Energy Future

Technical Standards for Electric Service Workgroup Areas of Focus Update

February 12, 2020



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Workgroup Focus Areas

- ✓ Definitions (sustained interruption, momentary interruption, major interruption, planned interruption, serious injury, AMI/solid-state meters)
- ✓ Meter inspection, testing, accuracy, and location
- ✓ Cybersecurity
- ✓ Accident and incident reporting
- ✓ Vegetation management/operations and maintenance
- ✓ Advanced technology – additional information available with modern meters
- ✓ Rule 411 (extension of electric service)
- ✓ Standard frequency for alternating current systems

Additional Considerations

- ✓ Consistency with “Technical Standards for Gas Service”
- ✓ Billing rule amendments
- ✓ Incorporated Standards - reference instead of adding language
- ~~✓ Incorporate “Electrical Supply and Communication Lines and Associated Equipment” ruleset into “Technical Standards for Electric Service”~~

Definitions

- Multiple comments from workgroup and guidance from LBNL related to definitions such as **planned interruption, major interruption/event, serious injury, AMI**, etc.
- May overlap into other Focus Areas such as metering subgroup

Meter Inspection, Testing, and Accuracy

- Subgroup Meetings to discuss changes to Parts 1, 3, and 6
 - January 24, 2020 – Part 3 (Ann Arbor Meeting complete)
 - February 26, 2020 – Parts 1 and 6 (call scheduled)
 - March 30, 2020 – (Jackson Meeting planned)
- R 460.3309 (Part 3) is being reviewed by the metering group and may be transferred to R 460.115 in the Billing Rules
- AMI/solid state meters - overlaps into the “Definitions” Focus Area

Cybersecurity

- Work is underway on a new rule to establish baseline cybersecurity requirements for electric utilities
- Staff to launch a cyber subgroup to facilitate cyber rule development and collect stakeholder feedback

Accident and Incident Reporting

- Serious Injury, planned interruption, major interruption, etc. - overlap into the “Definitions” Focus Area
- Utilities:
 - Staff would like a better understanding of OSHA/MIOSHA incident reporting and Emergency Response Plan content
 - Staff would like to solicit comments on individual customer outage processes and making outage records available to customers

Vegetation Management

- Multiple comments from the workgroup and guidance from LBNL related to vegetation management regarding pre-trim notifications, post-trim audit, prescriptive language, etc.
- Distribution category spend reporting requirement which includes vegetation management spend reports



Source: <https://oppdthewire.com/oppd-tree-trimming-policy-infographic/>

Advanced Technology

- Intent – consider AMI and advanced technologies in recommended updates
- Momentary Interruptions – addressed in Service Quality and Reliability Standards for Electric Distribution Systems (U-20629)
- Voltage Information – AMI and technology advancements provide additional voltage information. R 460.3701-3704 will be reviewed for potential updates

Rule 411 (Extension of Electric Service)

- Initial intent – amendments to provide clarity and consistency
- Multiple comments related to Rule 411
 - ABATE: suggest major updates
 - Utilities: suggest no updates
- Subgroup to consider concerns and allow for presentation of detailed information. Staff will provide meeting details

Standard Frequency for Alternating Current Systems

- R 460.3701 states “[t]he standard frequency for alternating current systems shall be 60 hertz. **The frequency shall be maintained within limits that will permit the satisfactory operation of customers’ clocks which are connected to the system.**”
- Concern – few customer clocks are synchronized to the grid
- Comments have been provided

Billing Rule Amendments

- Initial intent – to eliminate duplicative and/or conflicting language between Customer Standards and Billing Practices for Electric and Natural Gas Service” and “Technical Standards for Electric Service” rules
- Staff Electric Operations Section and Compliance and Investigation Section have worked to identify changes between the two sets of rules
 - Review the definition of “customer”
 - Changes between R 460.113(7) and R 460.3303(c) for consistency
 - Moving R 460.3309 to the billing rules (after metering subgroup review)

Assignment Due February 24, 2020

Submit comments on:

- New comments following LBNL presentation

- Utilities - provide details on the following:
 - Industrial customer outage analysis process
 - MIOSHA /OSHA reporting process and limitations
 - Emergency Response Plan process and limitations

- New comments in “Focus Areas”

Comment Submittal

1. Written comments can be submitted to the docket by emailing mpscedockets@michigan.gov and referencing MPSC Docket No. U-20630.

2. Alternatively, comments referencing the specific docket can be mailed to:

Michigan Public Service Commission

P.O. Box 30221

Lansing, MI 48909

Looking Ahead

Next Workgroup Meetings

March 12, 2020 @ MPSC Offices

April 7, 2020 @ MPSC Offices (tentative)

Questions



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