



August 6, 2020

Taylor Becker  
Michigan Public Service Commission  
7109 West Saginaw Highway  
PO Box 30221  
Lansing, MI 48909

Re: MPSC Case No. U-20629

Dear Mr. Becker:

I am submitting comments on the initial staff report on Service Quality and Reliability for Electric Service under the U-20629 case docket.

I previously submitted comments entered in the docket as filing number U-20629-0029 on March 24, 2020 on behalf of the Michigan Municipal Association for Utility Issues (MI-MAUI). My comments were submitted on behalf of several municipal governments around the state that receive street lighting services.

MI-MAUI's public comments were not acknowledged in the initial report. I am writing now to request that our submission be acknowledged in the final report and to request a substantive response to our proposals.

Reliability standards for streetlights may be somewhat afield from other topics addressed in this proceeding, but it is nonetheless important that they be addressed. Many municipalities around the state have significant and long-standing concerns with the reliability and quality of street lighting services they receive from regulated utilities. Streetlights are among the most visible of municipal services provided to the community, and in many cases constitute municipalities' single biggest energy expense.

Current procedures for identifying, reporting and following up on streetlight service issues are so burdensome to customers as to be unworkable, which in turn weakens accountability for utility providers to improve their services. Documentation requirements to secure outage credits are infeasible for customers to fulfill and in any event the credits are too trivial to justify the effort, and as a result credits are almost never granted. Current reliability standards omit any specific mention of streetlights and are impossible to interpret with relevance to streetlight services. Further, tariffed provisions related to streetlight quality and reliability are much weaker than and generally conflict with the general service quality and reliability standards for no apparent reason, which is unfair and confusing to streetlight customers.

Current Service Quality and Reliability standards need to be revised because they do not address the predominant types of service quality and reliability problems with streetlight services. Most streetlighting quality and reliability problems are caused by luminaires, not electric service interruptions as addressed by the current standards. Yet, luminaires are clearly part of the utility distribution system and should be covered by service quality and reliability standards per R 460.721, Rule 21:



Michigan Municipal Association for  
**UTILITY ISSUES**  
MI-MAUI

*“An electric utility shall plan to operate and maintain its distribution system in a manner that will permit it to provide service to its customers without experiencing an unacceptable level of performance as defined by these rules.”*

However, because the rules that follow this provision focus on metered services and electric service interruptions, it is effectively impossible to apply the standards to unmetered street lighting services, essentially establishing no quality and reliability standards at all for streetlighting customers to reference.

Thus, I request that the final report, and revisions to the service quality and reliability rules, create clear, meaningful and enforceable standards for street lighting services, or define some other process for establishing such rules for street lighting services.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Bunch".

Rick Bunch  
Executive Director

