



August 28, 2020

To: Charyl Kirkland, Tayler Becker, and Brian Sheldon
From: Tanya Paslawski, Michigan Electric and Gas Association

Re: Feedback on Initial Staff Reports on Technical Standards for Electric Service (U-20630) and Service Quality Standards (U-20629)

Charyl, Tayler, and Brian,

The MEGA companies¹ appreciate the MPSC staff's efforts to provide an open forum to discuss and collect feedback on the myriad of issues raised as part of the review of the Grid Security and Reliability Standards Workgroups. MEGA has engaged in the discussions to represent the unique position of small utilities to ensure the staff and other stakeholders understand how the impacts of potential changes can vary from that of larger utilities. These comments come from that perspective. Further, the MEGA companies support the comments provided separately by Indiana Michigan Power Company.

Please reach out if you have any questions or would like additional information on any of the feedback provided.

Technical Standards for Electric Service Rules (U-20630)

Generally, the MEGA companies had few concerns with the proposed changes to the Technical Standards. Here are a couple of suggestions that would improve the ruleset.

- Annual Line Clearing Report: (460.3203(i)) The line clearing plans included in the small utility rate cases have not been a source of controversy or concern. The level of data requested, and quarterly reporting will require a significant amount of manual work to report. MEGA suggests an exemption for small utilities since the use and effectiveness of these funds have not raised concerns. But, if staff retains this requirement, annual reports for small utilities is another reasonable accommodation.
- Solid State Meter Reporting: (460.3203(j)) this section provides a list of information on solid state meters. Some small utilities have not yet adopted and/or are early in the process of adopting solid state meters. As such, the requested data is either not available or data systems not currently structured to collect or report the data as stated in the rule. Either an exemption for small utilities, limiting the data required to subsection (ii) that describes how the small utility uses the data, or threshold of time after adoption of solid state meters would be an appropriate accommodation for small utilities.

Service Quality Standards

The MEGA companies offer the following feedback on the Service Quality Standards:

¹ There comments are joined by Alpena Power, Indiana Michigan Power Company, Upper Peninsula Power Company, Northern States Power-Wisconsin, and Upper Michigan Energy Resources Company.

- Wire Down Response: the addition of subsections sub sections (3) and (4) to 460.723 are vague and unnecessary. They appear to merely adopt that the expectations in sub sections (1) and (2) are good utility practice.
- Definitions: MEGA has several comments or suggestions related to the new or modified definitions on section 460.702.
 - Use of IEEE 1366 definition for CEMI in place of what was added at 460.702(d) or stop at the end of the first sentence of the new language because the rest of the definition does not apply to CEMI.
 - The definition of utility in 460.702 (g) does not make it clear whether transmission-caused interruptions should be included in its tracking and reporting or not.
 - The term “same circuit repetitive interruptions” in 460.702 (p) should be changed to “same-device repetitive interruption.” The original phrase has been confusing and interpreted differently among utilities. This change will bring more clarity and consistency.
- Momentary Outages: there are several concerns with both the value of the data collected and reporting of momentary outages as required in 460.732(s), particularly as it applies to small utilities, and especially on a quarterly basis and MEGA would like this requirement eliminated. First, as previously stated on this issue in the stakeholder process, the data will not distinguish between “good” momentary outages that are designed into the system to avoid widespread outages, and “bad” momentary outages that are truly a system failure and cause for concern. Further, some small utilities do not have equipment that would collect this data, and for some that have AMI, it is relatively new or in the implementation phase. Expensive software upgrades will be required even for those that have advanced meters. If the requirement is retained, an exemption for small utilities is appropriate or having a threshold for companies with “mature” AMI based on the amount of penetration in the system or number of years since full deployment.
- Outage Credits: The MEGA companies accept the increase in the amount of the outage credit, but annual adjustments are cumbersome. Revisiting the amount on a periodic basis makes some sense, but five years or more would be more meaningful to minimize short-term volatility in the number of billing system changes that would be needed. Moreover, changes to a stated amount in the rules should be done through another rulemaking, not using automatic adjustments. Further, some MEGA utilities do not have systems in place to automate the credits which will be costly to incorporate and may require significant manual processing. MEGA also has concerns with the proposal that credits should be prohibited from recovery. As noted, these credits are intended to be some compensation for customers experiencing outages but are not a penalty. Any amount associated with these credits would be better spent on continued improvements to the distribution system to avoid other issues in the future.
- Outage Credit Thresholds: The reduction of the threshold of same circuit repetitive outages in 460.746 should include an exemption for rural utilities that keeps the threshold at 7 or identify a threshold of customer complaints for small/rural utilities with a required report about how the issue will be addressed. No basis has been provided to support the need to change this number or the specific reduction proposed.

- Annual Reporting Requirements: The MEGA companies would appreciate the opportunity to see and comment on the staff format for annual reporting as part of the rule development process. In addition, the following suggestions apply to the reporting requirements:
 - 460.732(o) should apply to worst performing *segments*, not circuits. Using segments will directly point to areas of the system with repetitive issues. An exemption of this requirement for small utilities would also be appropriate since they have relatively few circuits and therefore the data wouldn't provide the type of insight that might be gained for a larger utility.
 - 460.732(p) same device would be a better measure than circuit, or use CEMI, SAIDI, SAIFI, CAIDI as better indicators state of the system overall. Similar to subsection (o) above, an exemption for small utilities would be appropriate due to the lack of value in the data.
 - 460.732(s) consider an exemption for small utilities or recognition that some utilities don't have the systems capability to make this information readily obtainable or valuable.