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Dear Ms. Voelker:

The Michigan Energy Innovation Business Council (Michigan EIBC),<sup>1</sup> Advanced Energy Economy (AEE),<sup>2</sup> and Advanced Energy Management Alliance (AEMA)<sup>3</sup> appreciate the opportunity to provide comments in response to Public Service Commission Staff’s Customer Education and Participation Recommendations (Recommendations). These organizations are referred to collectively in these comments as the “advanced energy companies,” “we,” or “our.” We have been active participants in the MI Power Grid workshops since the initiative’s launch and have appreciated the Public Service Commission Staff’s (Staff) time and effort to receive robust stakeholder feedback through all its proceedings.

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<sup>1</sup> Michigan Energy Innovation Business Council is an organization tasked with growing Michigan’s advanced energy economy by fostering opportunities for innovation and business growth and offering a unified voice in creating a business-friendly environment for the advanced energy industry in Michigan.

<sup>2</sup> AEE is a national business association representing leading companies in the advanced energy industry. AEE supports a broad portfolio of technologies, products, and services that enhance U.S. competitiveness and economic growth through an efficient, high-performing energy system that is clean, secure, and affordable.

<sup>3</sup> AEMA is a trade association under Section 501(c)(6) of the federal tax code whose members include national distributed energy resource companies and advanced energy management service and technology providers, including demand response (“DR”) providers, as well as some of the nation’s largest demand response and distributed energy resources. AEMA members support the beneficial incorporation of distributed energy resources (“DERs”) into wholesale markets to achieve electricity cost savings for consumers, contribute to system reliability, and ensure balanced price formation. This filing represents the collective consensus of AEMA as an organization, although it does not necessarily represent the individual positions of the full diversity of AEMA member companies.

Customer education and participation is an increasingly important aspect of the energy transition, particularly as the availability of distributed energy resources (DERs) and electric vehicles (EVs) proliferate in the market. Customer engagement,<sup>4</sup> especially informed engagement, is important to the success of Commission-approved utility programs and for growing the market for third-party DER products and services. This ultimately accelerates progress toward Michigan’s clean energy goals, provides new avenues for customers to provide valuable services to the grid, such as peak demand reductions, and increases opportunities for customers to save money while encouraging equal participation. On the other hand, a lack of customer engagement means that opportunities where value could be provided are missed, and the ability of the market to support progress toward clean energy goals and enhanced services to customers is diminished.

As the Staff recommendations are relatively high level, our comments are likewise broad in scope. We look forward to assisting Staff in integrating these recommendations into the final report of the Customer Education and Participation workgroup.

If you have any further questions about these comments, please contact Charles Beauregard and Michael Weiss.

Sincerely,

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<sup>4</sup> In these comments, we also use the term “customer engagement” to include both education and participation.

## **General Comments**

While we generally agree with the recommendations made by Staff, we believe it would be advantageous for the Commission and Staff to clearly differentiate between “public education and participation” and “customer education and participation.” Public engagement refers mainly to how members of the public can understand what the Commission does and how they can engage in regulatory processes. Most of Staff’s recommendations cover this topic, and indeed, the public does have a right to, and should be encouraged to, provide meaningful input to the regulatory process, and the Commission should be looking for ways to improve in this area.

Customer engagement is different – it refers to interactions between the utility and their customers, including via contracted agents of the utility, as well as with third parties, who provide products and services to utility customers, often as a result of those customers participating in a utility program or as a result of information made available to them via that initial engagement. This includes how utility customers can reduce their energy usage, manage energy costs, change their behavior, and choose clean energy options.

While both types of engagement are important, and there is overlap between public engagement and customer engagement, the distinction is notable. The bulk of Staff’s recommendations relate to public education and participation in regulatory processes, but we would argue that customer education and participation is the more important of the two and should be the main focus of this workgroup. So, while we certainly support a Commission-led effort to help the public understand and better participate in the regulatory process, we recommend approaching it independently from customer engagement.

This is, in part, because customers only have limited amounts of attention and time to learn or truly understand their energy costs and needs, let alone what actions they can take to make meaningful changes to their energy usage.

Thus, customer engagement efforts should be judicious and targeted to drive specific outcomes ensuring customers can understand their energy bills, including rates communication and education, or motivating customers to adopt more beneficial usage patterns or deploy DERs. Given the growing role of customer-side energy solutions, there are clear connections between improved customer engagement and the Commission's ability to support state energy policies and address system reliability and resiliency issues.

Regarding the staff-identified guiding principles in the introduction, the three that are listed are appropriate in our view, but also appear more focused on public participation in Commission-related matters. We would urge the Commission to establish principles related to customer engagement as well. To this end, we recommend adding a fourth principle, "Educate customers on available and planned energy programs."

### **Customer Engagement in the Regulatory Process**

As noted above, we support efforts to improve opportunities for members of the public to have better and equitable access to and input on regulatory decisions. It is critical to give meaningful opportunities for historically underrepresented communities to be part of these conversations. This could be done by removing economic barriers for the public by developing financial incentives to compensate non-utility stakeholders from communities that want to engage in Commission proceedings. As noted in workgroup meetings, the Federal Energy Regulatory Commission's Office of Public Participation has entertained the idea of providing direct procedural and financial assistance to intervenors. We would highly recommend investigating opportunities to increase funding for non-utility stakeholders, either through new funding mechanisms or through an expansion of the amount and usage of funds allocated in the Utility Consumer Participation Board (UCPB) and Utility Consumer Representation Fund (UCRF), as established in Michigan Public Act 304 of 1982.

We would also support efforts by utilities to engage with their customers more on issues that come before the Commission. As Staff's recommendations note, this can be through improved engagement strategies, such as improved outreach, more universally accessible electronic resources, and the use of accessible, straightforward language and explanations in publicly facing documents. Lastly, consistent with our delineation of "public" versus "customer" engagement, it may be appropriate to rename this section "Public Engagement in the Regulatory Process."

### **Improving Customer Participation and Education Regarding Energy Use and Program Options**

We appreciate the Commission and Staff's desire to make utility program offerings more accessible to customers and support the two specific Staff recommendations in this section. This education process should also include how the public can engage directly with regulators, utilities, or third parties to effect meaningful change, such as weatherization programs, energy audits or innovative energy efficiency, demand response, and renewable energy programs.

As we stated above, this aspect of engagement should be the focus of this workgroup, as it has the greatest potential to produce tangible benefits for customers, including lower energy costs, equitable access to and understanding of EWR and DR programs available to all customers, and increasing access to clean energy options. Furthermore, this engagement should be consistent with the overarching objectives of the MI Power Grid initiative and should be seen as a core strategy for maximizing the benefits of a transition to a distributed energy future. As such, we strongly urge the Commission to refocus and build out a comprehensive set of recommendations related to customer engagement. Advanced energy companies, whether operating as contracted agents of utilities or as independent providers of DER products and services, have substantial expertise in this area and look forward to providing more input on this topic.

## **Customer Education**

We agree that customer education, whether on general energy matters or Commission-specific issues, is important and can support achievement of greater benefits for utility customers. Furthermore, many populations have been historically marginalized in the market, partly due to the barriers created by difficulties in understanding regulations, laws, policies, and practices. Ideally, no interested party should be left out or go unheard. Additionally, as noted above, educational opportunities should focus not only on high-level regulatory work but also on customer engagement so that they can understand their bills and energy usage. This in turn, will lead customers to adopt more beneficial usage patterns on an individual basis.

We also note that Michigan has a well-established stakeholder community that is routinely engaged in matters before the Commission, with several entities already having submitted comments in this workgroup on the Staff proposal on customer data access and privacy. The Commission would be well served by tapping into this pool of stakeholders to develop plans for improved customer education.

Lastly, in keeping with our general recommendation to focus more on customer engagement and to separately address public participation, we see significant overlap with the recommendations in this section with those made in the section “Customer Engagement in the Regulatory Process.” The Commission should consider consolidating the two sets of recommendations.

## **General Outreach and Engagement**

We share the Commission and Staff’s desire to increase outreach and engagement. As noted above, we feel this is necessary to get better and more diverse feedback from as many affected parties as possible, particularly in light of the major changes occurring in the energy marketplace

regarding clean energy and climate change mitigation. These significant changes come with new challenges and opportunities that require unique solutions that only a broader range of views can help address. Also, because many solutions are novel, careful consideration of possible unintended consequences is warranted, making it even more important to ensure all marketplace participants are heard and engaged in the process. To this end, we also support the idea of broadly educating consumers about innovative technologies and programs as much as possible. We commend the Commission's outline in this section but would also like to point Staff to more specific examples of customer education as shared during the workgroup meetings. The Pennsylvania Public Utilities Commission (PA PUC) has its own customer service division whose sole purpose is to increase awareness and understanding of the many utility programs and services available to them. To that end, their staff has developed a customer education video that is featured on the website's homepage and gives visitors a tutorial on how to engage with available materials. In addition, the PA PUC has had its staff conduct educational programs in public settings in several counties across the state, which have led to clear dissemination of information and have served as an avenue for the PA PUC to build relationships with local organizations and advocates. These examples can serve as a model for how the Commission can implement the recommendations in this section, particularly with respect to the potential Community Outreach and Engagement Team.

### **Additional Research, Meetings, and Study**

Finally, we agree that the Commission and Staff should continue to identify additional research, host meetings, or conduct studies to further their education and participation efforts for both customers and stakeholders. This will support greater participation and input that will keep pace with the ever-changing marketplace and the challenges and opportunities it presents. We also advocate for proactive education, where the Commission and Staff should actively work to make sure novel practices have educational opportunities along with them to educate all interested parties.