



Memorandum

Date: February 22, 2022

To: Reka Holley Voelker
MPSC Customer Education and Participation Workgroup

From: Dan Dundas
Michigan Electric and Gas Association

Subject: MEGA Comments on Draft Staff Report for Customer Education and Participation

MEGA appreciates the opportunity to provide feedback on the Draft Recommendations for Customer Education and Participation. MEGA is supportive of customer involvement in the rate setting process and the Commission's efforts to increase transparency and understanding of ratemaking and utility operations

In its September 24, 2021 Order in U-18238, the Commission asked stakeholders about customer education and engagement. The Commission asked in Question 3:

How can the transparency and public engagement in utility rate cases be enhanced? What are the steps that could be taken by the Commission, the applicant utility, and the other parties to improve the public's understanding and access to the procedural process and decisions made in utility rate cases?

MEGA appreciates the numerous positive steps already taken by the Commission in this area, including in-territory hearings, policy briefs on topics of public interest, and detailed press announcements on Commission activities.

Further, MEGA members actively engage with the public on a regular basis sharing information about projects, program, and initiatives through community meetings, project-letters, and social media. However, it is worth noting that these public information campaigns come at a cost in terms of resources and utility staff time. MEGA members are always open to feedback to better service our customers.

MEGA would also caution, as in its previous reply comments in U-18238 submitted on November 5, 2021, that there are limits to customer engagement that should be kept in mind as the Staff and Commission undertake this process, particularly as it relates to the technical nature of rate case proceedings. Some commenters suggested including public comment in the proceedings. Further, the Staff notes that the recommendations "are intended to improve opportunities for customers to influence regulatory decisions."



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MEGA reiterates that rate cases and other proceedings before the Commission involve robust processes and suggestions that public comment be somehow more meaningful in the context of these proceedings where there is a rich history of case law and administrative procedures established to provide for orderly and cross-examined testimony by experts could ultimately become a dangerous precedent if set.

MEGA suggests Staff – as they endeavor in these education opportunities – to be mindful of the historic and legal precedents under which rate cases and other proceedings operate should it be interested in a more robust commenting process in rate cases. MEGA lauds the goal of increasing customer participation in the ratemaking process, but cautions the use of the word “influence” rate making decisions in the Staff’s description of the goal. MEGA would suggest that the goal be focused on improving “opportunities for customers to participate in regulatory decisions.”

Lastly, some of the recommendations in the Staff Report, including item 2 under “Customer Engagement in the Regulatory Process” and Item 2 under “Improving Customer Participation and Education regarding energy use and program options” will require the Commission and Staff to interface with the utilities and the public.

While MEGA members already engage with the communities they serve through a variety of functions, MEGA requests that the Staff and Commission please keep the limited resources of MEGA members in mind as they develop or refine avenues for outreach in partnership with MEGA members.

MEGA appreciates the opportunity to provide comment on this draft report and welcomes opportunities to collaborate with the Staff and Commission on these endeavors.