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March 10, 2000

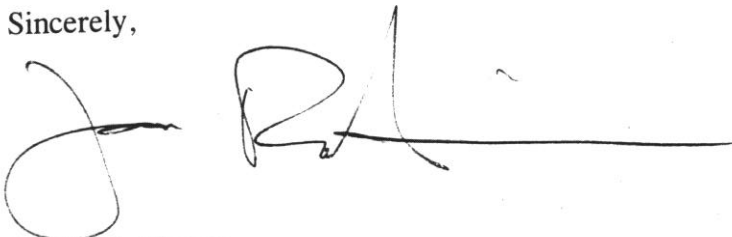
Ms. Dorothy Wideman
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way
P.O. Box 30221
Lansing, MI 48909

Re: Case Nos. U-11955 and U-11956

Dear Ms. Wideman:

Enclosed for filing in the above-referenced matter are an original and four copies of the "Answer of Consumers Energy Company to Energy Michigan Motion for Accelerated Judgement on Metering Issues". A Proof of Service is also enclosed.

Sincerely,



Jon R. Robinson

CC: Hon. James N. Rigas, ALJ
Parties per Attachment 1 to
Proof of Service

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of)
CONSUMERS ENERGY COMPANY)
for authority to recover implementation) Case No. U-11955
costs, for approval of stranded cost true-)
up methodology, and for other relief)
_____)

In the matter of the application of THE)
DETROIT EDISON COMPANY for)
authority to recover retail access program) Case No. U-11956
implementation costs and for approval of)
a true-up mechanism in connection with)
the recovery of stranded costs)
_____)

ANSWER OF CONSUMERS ENERGY COMPANY
TO ENERGY MICHIGAN MOTION FOR
ACCELERATED JUDGMENT ON METERING ISSUES

This is in response to the Motion for Accelerated Judgment on Metering Issues filed by Energy Michigan in this proceeding. In its motion, Energy Michigan asks the Commission to accelerate its decision regarding certain metering issues raised in this case, and to rule either that (1) alternative providers may offer metering services to retail customers in a manner which precludes electric utilities from providing such services, or (2) Detroit Edison should be required to adopt the practice currently followed by Consumers Energy and utilize metering technology which allows retailers¹ and customers to access data from those meters.

¹ “Retailers” is the term used to refer to third party power suppliers in the retail open access (“ROA”) programs of Consumers Energy Company (“Consumers Energy”) and The Detroit Edison Company (“Detroit Edison”).

For purposes of background, Consumers Energy notes that it has, for purposes of the ROA program, adopted a policy which provides retailers/ROA customers² two choices: (1) Consumers Energy will, one time each day, post a customer's hourly meter reads on a web site accessible to the retailer/customer, or (2) Consumers Energy will, for no additional charge, allow retailers/ROA customers direct access, on a real time basis, to the customers' meter data (i.e., the 15 minute demands).

Consumers Energy takes no position on whether Detroit Edison should be required to adopt the same metering data policy outlined above. Consumers Energy strongly opposes, however, the first form of the relief sought by Energy Michigan. In no event should the Commission adopt a policy which allows alternative providers of metering services to displace the utility's provision of such services. Such a policy would be unreasonable and unlawful, beyond the scope of the voluntary ROA program, and poor public policy. Consumers Energy refers the Commission to its brief and reply brief on this issue.

With respect to Energy Michigan's request that the Commission accelerate its decision on this issue, Consumers Energy takes no position. Consumers Energy emphasizes, however, that its metering practices are not inhibiting the implementation of the ROA program, and that the rationale offered by Energy Michigan for acceleration of a decision does not apply on the Consumers Energy system.

² These policies are with respect to customers having demands greater than 20 kW. Smaller customers are subject to load profiling, and access to meter data is therefore not in question.

WHEREFORE, Consumers Energy Company respectfully requests that the Commission rule in a manner consistent with this answer.

Respectfully submitted,

CONSUMERS ENERGY COMPANY

Dated: March 10, 2000

By:



Jon R. Robinson
212 West Michigan Avenue
Jackson, Michigan 49201
Attorney for Consumers Energy Company
(517) 788-0698

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of
CONSUMERS ENERGY COMPANY
for authority to recover implementation
costs, for approval of stranded cost true-up
methodology, and for other relief.

Case No. U-11955

In the matter of the application of
THE DETROIT EDISON COMPANY
for authority to recover retail access program
implementation costs and for approval of
a true-up mechanism in connection with
the recovery of stranded costs.

Case No. U-11956

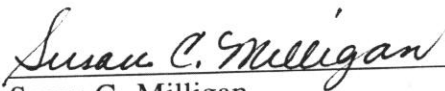
PROOF OF SERVICE

STATE OF MICHIGAN)
) SS
COUNTY OF JACKSON)

Sammie B. Dalton, being first duly sworn, deposes and says that she is employed in the Legal Department of Consumers Energy Company; that she served a copy of the "**Answer of Consumers Energy Company to Energy Michigan Motion for Accelerated Judgement on Metering Issues**" upon the persons listed in Attachment 1 hereto, electronically (in a PDF format) at the e-mail addresses listed therein and by first-class mail at the addresses listed therein by depositing the same on March 10, 2000, in the United States mail in the City of Jackson, Michigan with first-class postage thereon fully paid.



Subscribed and sworn to before me this 10th day of March, 2000.



Susan C. Milligan
Notary Public, Jackson County, Michigan
My Commission Expires: May 18, 2004

ATTACHMENT 1 -- to Case Nos. U-11955 and U-11956

Administrative Law Judge

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