

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter of **DTE ELECTRIC COMPANY'S**)
application for the regulatory reviews, revisions,)
determinations, and/or approvals necessary for) Case No. U-20851
to fully comply with Public Act 295 of 2008)
_____)

In the matter, on the Commission's own motion,)
regarding the regulatory reviews, revisions,)
determinations and/or approvals necessary for) Case No. U-20713
DTE ELECTRIC COMPANY to comply with)
Section 61 of 2016 PA 342.)
_____)

QUALIFICATIONS AND DIRECT TESTIMONY OF
JULIE K BALDWIN
MICHIGAN PUBLIC SERVICE COMMISSION

December 23, 2020

QUALIFICATIONS OF JULIE K BALDWIN
CASE NUMBER U-20851 et al
PART I

1 Q. Please state your full name, business address, and occupation.

2 A. My name is Julie K. Baldwin, and my business address is 7109 West Saginaw
3 Highway, Lansing, Michigan 48917. I am employed by the Michigan Public
4 Service Commission (MPSC or Commission) as the Manager of the Renewable
5 Energy Section (Section) of the Energy Resources Division.

6 Q. Please describe your current responsibilities.

7 A. I became Manager of the Section in December 2010. In addition to myself, the
8 Section presently includes a staff of four professionals: two departmental analysts,
9 an engineer, and an auditor. This Section was established in direct response to the
10 passage of Michigan's Clean, Renewable and Efficient Energy Act of 2008 (2008
11 PA 295). In general, the Section provides MPSC Staff (Staff) oversight and input
12 regarding all the Commission's regulatory responsibilities for renewable energy.

13 Q. Describe your educational and professional background.

14 A. I graduated from Michigan State University in June 1987 with a Bachelor of
15 Science Degree in Chemical Engineering. I was employed by TRC
16 Environmental Consultants in Los Angeles, California from February 1988 to
17 June 1989 and was involved in various air quality consulting projects.
18 In July 1989, I began my employment with the Michigan Public Service
19 Commission as a Public Utilities Engineer working in the areas of Act 9 natural
20 gas contract pricing issues, natural gas and petroleum products pipeline
21 certificates of public convenience and necessity, and monthly natural gas
22 production reporting. I began working on electric and natural gas tariff
23 administration in December 2002, and in October 2003 was transferred to the

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1 Rates and Tariff Section. My tariff administration responsibilities included
2 reviewing all electric and natural gas tariff filings, reviewing Commission orders
3 to determine whether tariff filings were necessary, reviewing rate books to see if
4 they met the requirements of U-6300 (Administrative Regulations Prescribing the
5 Filing Procedures for Rate Schedules, Rules and Regulations, Standard Forms,
6 and Contracts by Electric, Water, Steam, and Gas Utilities), and serving as case
7 coordinator for various ex parte electric and natural gas tariff-related cases filed
8 with the Commission.

9 In June 2005, I attended an Electric Utility Consultants, Inc. (EUCI) course
10 titled Introduction to Cost of Service Concepts and Techniques for Electric
11 Utilities in Denver, Colorado. Shortly after the course, I was temporarily
12 assigned as Executive Assistant to former Commission Chairman J. Peter Lark. I
13 remained in that position until May 2006. Next, I was assigned to what is now the
14 Renewable Energy Section of what is now known as the Energy Resources
15 Division. I was the lead engineer for matters pertaining to electric
16 interconnections and net metering. My work responsibilities included developing
17 and assisting in implementing rules for the 2008 PA 295 net metering program
18 and electric utility interconnection, serving as case coordinator for net metering
19 and electric utility interconnection formal complaint cases, resolving informal net
20 metering and electric utility interconnection complaints and inquiries, and public
21 education and outreach. Additional responsibilities included reviewing rates
22 impacting distributed generation in utility rate cases, green pricing programs, and
23 renewable energy contracts filed for approval with the Commission. During 2008

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1 and 2009, I served as the Commission's representative and Secretary on the Wind
2 Energy Resource Zone Board established by the Commission pursuant to 2008
3 PA 295.

4 Q. Have you previously filed testimony in proceedings before the Commission?

5 A. Yes. During my work at the MPSC, I have filed testimony in the following cases:

- 6 • Case No. U-10546 (Act 9 natural gas contract pricing case)
- 7 • Various Act 9 natural gas pipeline cases
- 8 • Case No. U-14347 (Consumers Energy Electric Rate Case)
- 9 • Case No. U-15244 (Detroit Edison Rate Case)
- 10 • Case No. U-16191 (Consumers Energy Electric Rate Case)
- 11 • Case No. U-16180 (Indiana Michigan Power Rate Case)
- 12 • Case No. U-16356 (Detroit Edison Renewable Energy Reconciliation Case)
- 13 • Case No. U-16543 (Consumers Energy Amended Renewable Energy Plan Case)
- 14 • Case No. U-16582 (Detroit Edison Amended Renewable Energy Plan Case)
- 15 • Case No. U-16424-R (Wisconsin Electric 2011 PSCR-R)
- 16 • Case No. U-16434-R (Detroit Edison 2011 PSCR-R)
- 17 • Case No. U-17072 (WEPCo Renewable Energy Plan Case)
- 18 • Case No. U-17562 (WEPCo Renewable Energy Plan Case)
- 19 • Case No. U-17735 (Consumers Energy Rate Case)
- 20 • Case No. U-17767 (DTE Electric Rate Case)
- 21 • Case No. U-18061 (UMERC Merger & Acquisition Case)
- 22 • Case No. U-18090 (Consumers Energy Avoided Cost Case)
- 23 • Case No. U-18091 (DTE Electric Avoided Cost Case)

QUALIFICATIONS OF JULIE K BALDWIN
CASE NUMBER U-20851 et al
PART I

- 1 • Case No. U-18089 (Alpena Avoided Cost Case)
- 2 • Case No. U-18092 (Indiana Michigan Power Avoided Cost Case)
- 3 • Case No. U-18093 (Northern States Power Avoided Cost Case)
- 4 • Case No. U-18094 (UPPCO Avoided Cost Case)
- 5 • Case No. U-18095 & U-18096 (WEPCo and UMERC Avoided Cost Case)
- 6 • Case No. U-18322 (Consumers Energy Rate Case)
- 7 • Case No. U-18255 (DTE Electric Rate Case)
- 8 • Case No. U-20162 (DTE Electric Rate Case)
- 9 • Case No. U-20276 (UPPCO Electric Rate Case)
- 10 • Case No. U-18232 (DTE Electric Renewable Energy Plan Case)

DIRECT TESTIMONY OF JULIE K BALDWIN
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PART II

1 Q. What is the purpose of your testimony?

2 A. The purpose of my testimony is to describe recent Michigan Public Service
3 Commission (MPSC or Commission) activities related to community solar and
4 provide Staff's community solar program proposal recommendation for DTE.

5 Q. Are you sponsoring any exhibits?

6 A. Yes. I am sponsoring Staff Exhibit S-2.
7 Staff Exhibit S-2: Summary of Barriers and Opportunities to Third-Party
8 Community Renewable Energy Projects.

9 Q. Has there been recent activity related to community solar at the MPSC?

10 A. Yes. On October 5, 2018, the Commission issued Orders in Case Nos. U-18351
11 and U-18352 directing Staff to convene a stakeholder process to "...examine the
12 potential opportunities and barriers to third-party community energy projects that
13 could be integrated into utility planning and procurement processes."¹ The
14 Third-Party Community Energy Projects Workgroup held four stakeholder
15 meetings during 2019, and Staff prepared a draft report titled "Summary of the
16 Third-Party Community Energy Project Stakeholder Engagement Process,"
17 which has not yet been finalized.² A professionally facilitated process was used to
18 develop a list of the barriers and opportunities identified by the stakeholders
19 during two of the stakeholder meetings. A summary of the barriers and
20 opportunities (Attachments A and B to the report) is provided in Staff Exhibit S-2.

¹ See webpage for stakeholder process: https://www.michigan.gov/mpsc/0,9535,7-395-93307_93312_93320_94834-484912--00.html

² See draft report: https://www.michigan.gov/documents/mpsc/3CRE_Result_Report_-_Out_for_comment_09122019_665640_7.docx

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1 Additionally, various parties have filed testimony related to community solar in
2 other cases. During recent years, Staff has participated in meetings with
3 stakeholders to discuss community solar.

4 Q. Why is Staff recommending a community solar proposal in this case?

5 A. Staff witness Merideth Hadala describes language in the Commission’s July 9,
6 2020 Order in DTE’s previous renewable energy plan case (Case No. U-18232)
7 directing DTE to consider community solar in the context of a Voluntary Green
8 Pricing (VGP) program. She notes that DTE testified in this case about
9 continuing to work on a concept for a low-income community solar offering.

10 Q. Please describe Staff’s basic concepts for a community solar program.

11 A. Staff’s concept for community solar is to help shape a community solar program
12 which addresses the following three key regulatory elements:

- 13 ● Provides an option for customers to have access to renewable energy located
- 14 in their community without having to build, own, and operate an on-site project.
- 15 ● Ensures that participating customers receive a community solar program credit
- 16 amount that reflects all appropriate benefits from the community solar project.
- 17 ● Ensures that non-participating customers do not pay any costs associated with
- 18 the community solar program if the adjusted cost (includes adjustment factors
- 19 determined in a future Commission forum) of a community solar project is higher
- 20 than a utility-scale solar project the utility would procure to serve all customers.

21 Q. Please describe Staff’s community solar proposal.

22 A. Staff proposes the following steps to develop a community solar program and
23 satisfy the key regulatory elements discussed above:

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1 1. Establish a community solar program rider with the energy and capacity
2 portion of the community solar program credit based on the highest cost project
3 selected from DTE’s most recent request for proposals. For example, DTE’s
4 filing in Case No. U-20851, which requests approval of contracts for three utility-
5 scale solar projects from DTE’s 2019 Request for Proposal (RFP), shows the
6 highest levelized cost of energy is approximately \$0.054 per kWh. The
7 community solar credit values pursuant to the community solar program rider
8 would be applicable to a community solar project for 20 – 25 years or based on
9 the terms in the contracts selected in DTE’s most recent RFP.

10 2. In a future forum, Staff recommends the Commission conduct a thorough
11 review and comparison between utility-scale, transmission-connected solar and
12 distribution-connected community solar to identify each individual adjustment
13 factor that should be applied to the base community solar program rider credit,
14 described in paragraph 1 above, to appropriately account for benefits and costs of
15 the community solar project. A calculation formula should be developed to
16 account for site-specific factors related to a community solar project. The
17 Commission may want to consider approving these formulas and adding them to
18 the community solar rider.

19 3. DTE will own and operate the community solar project and will issue an RFP
20 for the design and construction of the project.

21 4. DTE will manage subscriptions, charge the subscription fee, and provide the
22 appropriate community solar program credit on customer bills. Participating

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1 customers would continue to pay retail rates for utility deliveries. The community
2 solar program rider would provide for the subscription fee and program credit.

3 Q. How would community solar projects be selected for participation in the
4 community solar program rider?

5 A. A community group, municipal entity, church, business, etc... (community solar
6 group or CSG) would identify a project location, approximate project size, an
7 estimate of the number of potential subscribers, and any special needs for
8 inclusion into the project, such as community job training during construction or
9 pollinator friendly vegetation. The following activities could be part of the steps
10 taken to develop a community solar project under a community solar program
11 rider:

- 12 1. CSG provides the project information described above to DTE.
- 13 2. DTE reviews the information and provides an estimate of total project cost in a
14 levelized cost of energy (LCOE) format. DTE calculates the total community
15 solar program rider credit – including all appropriate adjustments in \$ per kWh.
16 DTE compares the total project LCOE against the calculated adjusted total
17 community solar program rider credit using all of the appropriate adjustment
18 factors from the community solar program rider. If the total project LCOE is
19 greater than the calculated adjusted total community solar program rider credit,
20 then the CSG must provide “buy-down, up-front funding” so that the community
21 solar project LCOE, when adjusted downward by the “buy-down, up-front
22 funding,” is equal to or less than the calculated adjusted total community solar
23 program rider credit. The purpose of the “buy-down, up-front funding” provided

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1 by the CSG is to ensure that non-participating customers are held harmless from
2 paying more than the calculated total community solar program rider credit in the
3 event that the CSG is unable to pay for the full cost of the project in the future.

4 Community solar projects fully subscribed for the life of the community solar
5 project by municipalities, government entities, and educational institutions may
6 be exempted from the “buy-down, up-front funding” requirement due to their
7 likelihood of not experiencing future bankruptcy or closure.

8 3. CSGs may make special arrangements to fund low-income participation in
9 their community solar project.

10 Q. Does Staff’s community solar program proposal address some of the barriers and
11 opportunities listed in Staff Exhibit S-2?

12 A. Yes. The proposed community solar program rider credit with calculated
13 adjustments provides the appropriate subscription credit to subscribers while
14 protecting non-participants from subsidizing the costs. The ability of CSGs to
15 bring community solar project proposals to DTE provides opportunities for
16 community engagement. If the cost of the community solar project is higher than
17 the proposed community solar program rider credit with adjustments, the CSG
18 will provide “buy-down, up-front funding” to protect non-participating customers
19 from the higher cost of the community solar project in the event of a future
20 bankruptcy or business closure. CSGs could be low-income communities or work
21 with low-income communities for inclusion in community solar project decision
22 making.

23 Q. Please explain what Staff is recommending in this case.

DIRECT TESTIMONY OF JULIE K BALDWIN
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1 | A. Staff's community solar program proposal is a framework only, with many details
2 | remaining to be worked out. Staff is recommending that the Commission
3 | consider the proposal as a vehicle to establish a community solar program rider
4 | for DTE.

5 | Q. Does this conclude your testimony?

6 | A. Yes.

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DTE ELECTRIC COMPANY to comply with)
Section 61 of 2016 PA 342.)
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QUALIFICATIONS AND DIRECT TESTIMONY OF
MERIDETH A. HADALA
MICHIGAN PUBLIC SERVICE COMMISSION

December 23, 2020

QUALIFICATIONS OF MERIDETH A. HADALA
CASE NUMBER U-20851 et al
PART I

1 Q. Please state your full name, business address, and occupation.

2 A. My name is Merideth A. Hadala and my business address is 7109 West Saginaw
3 Highway, Lansing, MI 48917. I am employed as a departmental analyst in the
4 Renewable Energy Section of the Energy Resources Division at the Michigan
5 Public Service Commission (MPSC or Commission).

6 Q. Please describe your educational background.

7 A. In 2002, I earned a Bachelor of Science degree in Packaging from Michigan State
8 University. In 2009, I earned a Master of Business Administration from DeVry
9 University.

10 Q. What is your professional work experience?

11 A. I have worked for the Commission since 2011. From 2011 until November 2016,
12 I worked in the Access Restructuring Fund Section of the Telecommunications
13 Division. My primary responsibility was to maintain the Access Restructuring
14 Mechanism fund for the State of Michigan, disbursing over \$1 million per month
15 to ensure continued telecommunications services to the customers of Michigan.

16 In the latter part of 2016, I was transferred into the Renewable Energy
17 Section and became involved in the Commission's administrative activities
18 related to 2008 PA 295 (Act 295), focusing on electric providers' renewable
19 energy plan filings, annual renewable portfolio standard compliance reviews, Act
20 295 contract review filings, renewable reconciliation, and Public Utility
21 Regulatory Policies Act of 1978 (PURPA) cases.

22 Q. Have you filed testimony in any other proceedings before the Commission?

23 A. Yes. During my work at the MPSC, I have filed testimony in the following cases:

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- 1 - Case No. U-18082 (DTE Renewable Energy Cost Reconciliation Case)
- 2 - Case No. U-18089 (Alpena Power Avoided Cost Case)
- 3 - Case No. U-18092 (Indiana Michigan Power Avoided Cost Case)
- 4 - Case No. U-18093 (Northern States Power Avoided Cost Case)
- 5 - Case No. U-18094 (Upper Peninsula Power Avoided Cost Case)
- 6 - Case No. U-18095 & U-18096 (WPSC and WEPCo Avoided Cost Case)
- 7 - Case No. U-18236 (UMERC Renewable Energy Plan Case)
- 8 - Case No. U-18237 (WEPCo Renewable Energy Plan Case)
- 9 - Case No. U-18242 (DTE Reconciliation Case)
- 10 - Case No. U-18243 (I&M Reconciliation Case)
- 11 - Case No. U-18231 (CE Renewable Energy Plan Case)
- 12 - Case No. U-18233 (I&M Renewable Energy Plan Case)
- 13 - Case No. U-18234 (Northern States Power Renewable Energy Plan Case)
- 14 - Case No. U-18230 (Alpena Power Renewable Energy Plan Case)
- 15 - Case No. U-18235 (UPPCO Renewable Energy Plan Case)
- 16 - Case No. U-18232 (DTE Renewable Energy Plan Case)
- 17 - Case No. U-20165 (CE Integrated Resource Plan Case)
- 18 - Case No. U-20172 (DTE Renewable Energy Cost Reconciliation Case)
- 19 - Case No. U-20171 (CE Renewable Energy Cost Reconciliation Case)
- 20 - Case No. U-18091 (DTE Avoided Cost Case)
- 21 - Case No. U-20350 (UPPCO Integrated Resource Plan Case)
- 22 - Case No. U-20591 (I&M Integrated Resource Plan Case)
- 23 - Case No. U-20697 (CE Rate Case)

DIRECT TESTIMONY OF MERIDETH A. HADALA
CASE NUMBER U-20851 et al
PART II

1 Q. What is the purpose of your testimony?

2 A. The purpose of my testimony is to recommend the approval of DTE Electric
3 Company's (DTE or Company) renewable energy plan (REP) and to summarize
4 the Commission's recommendations from previous orders regarding the addition
5 of future assets.

6 Q. Please summarize the renewable energy assets in DTE's August 2020 Amended
7 REP.

8 A. DTE proposed two Company-owned solar parks totaling approximately 320 MW
9 and one solar power purchase agreement (PPA) of approximately 100 MW, all
10 with 2022 commercial operation dates (COD). Additionally, DTE proposed a
11 61.9 MW generic solar build for 2023, a 182.8 MW generic solar build for 2024,
12 and a 131.7 MW generic solar build for 2025. All of these renewable energy
13 assets will be used for DTE's Voluntary Green Pricing (VGP) program.

14 Q. How are these projects selected?

15 A. For the projects with 2022 COD, DTE has chosen from projects that bid into the
16 Company-issued 2019 request for proposal (RFP). DTE stated that the future
17 projects (COD 2023, 2024, and 2025) will be chosen via a competitive bidding
18 process.

19 Q. Does MPSC Staff (Staff) recommend approval of DTE's amended renewable
20 energy plan?

21 A. Yes. Staff recommends the approval of DTE's amended REP.

22 Q. Please summarize the Commission's recommendations for the competitive
23 bidding process for these future renewable energy assets.

DIRECT TESTIMONY OF MERIDETH A. HADALA
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- 1 A. The Commission made several observations and recommendations to DTE
2 regarding the competitive bidding process in its July 9, 2020 Order in Case No.
3 U-18232. First, the size limitations of the Company-issued 2019 RFP had the
4 effect of limiting the pool of projects that were eligible to respond to the RFP. At
5 the time the RFP was issued, DTE had more than 600 MW of solar resources
6 sized between 2 MW and 25 MW in its queue. The terms of the RFP excluded
7 these projects from participating. The Commission strongly encouraged DTE to
8 find opportunities to allow these projects to be submitted for consideration.
9 Second, the Commission stated concerns with the central role that DTE played in
10 setting the terms for the RFP. The Company, and only the Company, had
11 knowledge of the weighting of the project selection criteria and the role that non-
12 price factors would play in the ultimate selection of projects. “For future
13 solicitations, the Commission expects a process that is both more independent and
14 more robust, informed by stakeholder input through the MI Power Grid
15 Competitive Procurement Workgroup, including better defining the utility’s role
16 in RFP development and administration, incorporating best practices from other
17 jurisdictions, and addressing barriers to emerging technologies or business models
18 related to the procurement process.” (See July 9, 2020 Order in Case No. U-
19 18232, p. 44.) Third, the Commission encouraged DTE to consider opportunities
20 for smaller and/or community-based renewable energy projects to meet customer
21 demand for the VGP program.
- 22 Q. Does Staff have recommendations for the solar resources sized 2 MW to 25 MW
23 in DTE’s queue?

DIRECT TESTIMONY OF MERIDETH A. HADALA
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1 A. DTE did not discuss these solar resources in its testimony, despite the
2 Commission’s recommendation in the July 9, 2020 Order in Case No. U-18232.
3 Staff recommends that future RFPs issued by DTE should not exclude smaller
4 projects from participation. The solar resources in DTE’s interconnection queue
5 may provide economical project options for the Company to fill its VGP
6 subscription needs. DTE should examine all available resources for its next RFP.

7 Q. Does Staff have recommendations for DTE’s future VGP renewable energy
8 supply?

9 A. Yes. In his testimony, Staff witness Cody Matthews recommends that DTE
10 continue to track the VGP program and update the Commission Staff about
11 participation and forecast information before the Company issues its RFP for the
12 additional VGP renewable energy supply proposed for 2024 and 2025.

13 Q. What does Staff recommend for DTE regarding a low-income community solar
14 program?

15 A. DTE testified that they have taken the Commission Order under consideration and
16 are continuing to work on a concept for a low-income community solar project.
17 In her testimony, Staff witness Julie Baldwin discusses recommendations for a
18 community solar framework.

19 Q. Please elaborate on the MI Power Grid Competitive Procurement Workgroup.

20 A. On August 20, 2020, the Commission issued an Order in Case No. U-20852
21 directing Staff to convene a competitive bidding collaborative, referred to as the
22 Competitive Procurement Workgroup. “The Commission’s objective for the

DIRECT TESTIMONY OF MERIDETH A. HADALA
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1 Competitive Procurement Workgroup is to ensure strong, technology-neutral
2 market response and value for ratepayers through transparency, non-
3 discriminatory access, certainty, and fairness in bidding processes.” (See August
4 20, 2020 Order in Case No. U-20852.) The Commission suggested the following
5 principles for consideration by the workgroup: 1) Open, non-discriminatory
6 treatment of resources regardless of ownership structure, resource type or size,
7 and location; 2) All potential bidders provided with information on the minimum
8 RFP requirements and specification of evaluation criteria; 3) Oversight and
9 independence of RFP process, including define the use and role of a third-party
10 administrator/evaluator; and 4) Inclusion of the Staff and stakeholders in the
11 process and continuous improvement in bidding processes as the energy industry
12 evolves. The final goal of the workgroup is for Staff to file proposed competitive
13 procurement guidance or rules for consideration by the Commission.

14 Q. What are Staff’s recommendations about future competitive procurement?

15 A. Staff recommends that DTE continue its participation in the Competitive
16 Procurement Workgroup.

17 Q. Does this complete your testimony?

18 A. Yes.

S T A T E O F M I C H I G A N
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QUALIFICATIONS AND DIRECT TESTIMONY OF
CODY S. MATTHEWS
MICHIGAN PUBLIC SERVICE COMMISSION

December 23, 2020

QUALIFICATIONS OF CODY S. MATTHEWS

CASE NUMBER U-20851 et al

PART I

1 Q. Please state your name and business address.

2 A. My name is Cody S. Matthews. My business address is 7109 W. Saginaw Hwy.,
3 Lansing, Michigan 48917.

4 Q. By whom are you employed and in what capacity?

5 A. I am employed by the Michigan Public Service Commission (MPSC or
6 Commission) as a Public Utilities Engineer Specialist in the Renewable Energy
7 Section of the Energy Resources Division.

8 Q. Please describe your educational background.

9 A. I earned a Bachelor of Science degree in Engineering from Michigan State
10 University in 2014.

11 Q. Would you please describe your professional background.

12 A. In 2014, I began working for the MPSC in the Smart Grid Section. I reviewed
13 sections of utility rate case filings that pertained to smart grid, advanced metering
14 infrastructure (AMI), demand response (DR), information technology (IT), and
15 cyber-security. In 2019, I was transferred into the Renewable Energy Section and
16 am focusing on electric provider's Renewable Energy Plan and reconciliation
17 filings, electric utility interconnection, integrated resource plan filings, and
18 activities related to the Public Utility Regulatory Policies Act (PURPA) of 1978.

19 Q. Have you received any work-related training since starting your employment with
20 the MPSC?

21 A. Yes. I have attended several programs hosted by the Institute of Public Utilities at
22 Michigan State University including Introduction to Public Utility Regulation, the
23 full two-week fundamental and intermediate course, and the Advanced

QUALIFICATIONS OF CODY S. MATTHEWS

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PART I

1 Regulatory Studies Program, as well as the Michigan Forum on Economic
2 Regulatory Policy and the Rate Making Course. Additionally, I have participated
3 in several conferences both in person and online concerning cyber security, IEEE
4 1547, and other renewable energy related topics.

5 Q. Have you previously testified before the Commission?

6 A. Yes, I have testified in the following cases:

7 - No. U-17767, DTE Electric Company's general electric rate case.

8 - No. U-17999, DTE Gas Company's gas rate case.

9 - No. U-18014, DTE Electric Company's general electric rate case

10 - No. U-18255, DTE Electric Company's general electric rate case

11 - No. U-18370, Indiana Michigan Power Company's general electric rate case

12 - No. U-18999, DTE Gas Company's gas rate case

13 - No. U-20137, Indiana Michigan Power Company's opt-out tariff case

14 - No. U-20165, Consumers Energy Integrated Resource Plan

15 - No. U-20162, DTE Electric Company's general electric rate case

16 - No. U-18091, DTE Electric Company's avoided cost case

17 - No. U-20350, Upper Peninsula Power Company's Integrated Resource Plan

18 - No. U-20471, DTE Electric Company's Integrated Resource Plan

19 - No. U-20591, Indiana Michigan Power Company's Integrated Resource Plan

20 - No. U-20561, DTE Electric Company's general electric rate case

21 - No. U-18232, DTE Electric Company's Renewable Energy Plan Case

22 - No. U-20697, Consumers Energy Company's general electric rate case

DIRECT TESTIMONY OF CODY S. MATTHEWS
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PART II

1 Q. What is the purpose of your testimony in this proceeding?

2 A. The purpose of my testimony is to present the Michigan Public Service
3 Commission's Staff (Staff) recommendations regarding DTE Energy's (DTE or
4 the Company) voluntary green pricing programs (VGP) and financial
5 compensation mechanism (FCM).

6 Q. Are you sponsoring any exhibits in this proceeding?

7 A. Yes. I am sponsoring the following exhibit:

8 Exhibit S-1 Audit response CSM-1

9 Q. Was this exhibit prepared by you or under your supervision?

10 A. Yes.

11 **Voluntary Green Pricing**

12 Q. Has Staff reviewed the Company's forecast for its VGP program?

13 A. Yes, Staff has reviewed the forecast for DTE's VGP program and finds that
14 DTE's near-term forecasts for the VGP program are reasonable.

15 Q. Please explain your recommendation.

16 A. Staff supports DTE's 797 MW of VGP expansion, which is planned to be
17 operational by the end of 2025. At this time, due to the risk of potential customers
18 not materializing, Staff recommends continued tracking of customer interest in
19 the VGP program and that prior to issuing Request for Proposals (RFPs) for the
20 2024 and 2025 VGP resources (183 MW in 2024 and 132 MW in 2025), the
21 Company provide Staff updated participation and forecast information to ensure
22 these assets are needed. This will ensure that the current VGP assets are used and

DIRECT TESTIMONY OF CODY S. MATTHEWS
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1 useful prior to building or purchasing more and give the Company and Staff a
2 better idea about the trajectory of the VGP program.

3 Q. What is your recommendation for the appropriate transfer price schedule for the
4 renewable energy projects approved in this case?

5 A. The renewable energy projects approved in this case should utilize the most recent
6 transfer price schedule in effect at the time each contract is approved by the
7 Commission.

8 Q. Does Staff support approval of Rider 19 as a VGP compliant program?

9 A. Yes. The Rider 19 pilot program is available to DTE customers with an annual
10 maximum demand of at least 1 MW, and allows these customers to designate a
11 percentage of their electric usage to match with renewable energy resources and
12 pay a levelized, cost-based subscription fee and receive market-based energy and
13 capacity credits. In the Commission’s January 18, 2019 Order in Case Number U-
14 20343, the Commission stated:

15 “The renewable energy assets that will be dedicated to the program are nearly two
16 years from commercial operation; thus, the company can only provide the
17 Commission with an estimate as to what the subscription fee for program
18 participants will be. Because the renewable energy assets intended for the
19 program are still being addressed in the company’s REP case, Case No. U-18232,
20 the Commission reserves a final determination of the program’s compliance with
21 Section 61 until the company’s next biennial review.”¹

22
23 Staff recommends the Commission approve DTE’s Rider 19 pilot program as a
24 section 61 compliant VGP program as DTE has shown that the assets proposed in

¹ U-20343 January 18, 2019 Order, p. 5.

DIRECT TESTIMONY OF CODY S. MATTHEWS
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1 U-20343 have been built and fully subscribed at this time. Additionally, DTE has
2 shown that customers are actively requesting more capacity in the pilot.

3 Q. Has DTE proposed changes to Rider 17 and 19?

4 A. Yes. The Company has proposed the following changes to Riders 17 and 19:

5 **Rider 17 –**

6 ■ The addition of a solar only option. This would give more options for
7 customers.

8 ■ A fixed price payment option, this would allow customers to have a fixed cost
9 every month making bills more predictable and easier to understand.

10 ■ The Company is also requesting approval to change its capacity credit from
11 75% of CONE to be the greater of the annual Planning Resource Auction or 75%
12 of CONE, which will ensure customers receive a higher capacity credit for the
13 projects they have subscribed to if the capacity auction clears at greater than 75%
14 of CONE.

15 ■ The Company is introducing a voluntary option for Rider 17 customers to
16 contribute to a fund that will be used specifically to sponsor low-income customer
17 subscriptions in the MIGreenPower program.

18 **Rider 19 –**

19 ■ The Company is proposing a prepayment option for customers to prepay
20 subscription fees.

21 ■ The Company is requesting approval to use net premium as the evaluation basis
22 for cost-averaging new renewable energy projects into the program, instead of

DIRECT TESTIMONY OF CODY S. MATTHEWS
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1 using the levelized cost of energy (LCOE). The net premium is the LCOE of the
2 project minus the energy and capacity credits.

3 Q. Does Staff support the proposed tariff changes for Riders 17 and 19?

4 A. Yes. DTE's proposed changes increase the offerings to customers and simplify
5 the monthly bills, making it easier for customers to understand what they are
6 paying for. DTE's proposal to create a fund for customers to make voluntary
7 contributions for low-income participants is discussed further below. Staff
8 supports the recommended tariff changes.

9 Q. Does Staff support the Company's proposed low-income community renewable
10 energy pilot offering?

11 A. Yes, the Company has proposed a pilot program that allows current VGP
12 customers to voluntarily donate to a fund that would allow low-income customers
13 to be part of the MIGreenPower program with the subscription fees fully
14 subsidized. Because the costs of the program will be fully covered, the customer
15 receives a net credit of \$0.029/kWh on their bill.

16 Q. Does Staff have additional recommendations for other community renewable
17 energy pilot offerings?

18 A. Yes. DTE's proposed pilot does not allow for customers to directly sponsor
19 selected customers, as shown in Exhibit S-1; in the proposed pilot participants
20 will be chosen by the Company. Staff recommends the Company investigate the
21 option to allow organizations to sponsor customers selected by that organization
22 and pay for the subsidization for those customers directly. This allows for
23 different funding options and customer access options for the pilot. Staff supports

DIRECT TESTIMONY OF CODY S. MATTHEWS
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1 the proposed pilot and recommends the Company continue to work with Staff and
2 stakeholders to continue to update stakeholders on the status of the pilot and
3 explore other low-income VGP offerings. Staff recommends that Rider 17
4 include information about the criteria used to qualify low-income customers
5 eligible to participate in the low-income community renewable energy pilot.

6 Q. How should the funding received from customers for the low-income community
7 renewable energy pilot be managed?

8 A. The revenue (funding) should be tracked separately and if there is month-to-
9 month carryover, the balance should be credited with interest at the Company's
10 short-term borrowing rate.

11 Q. What information should be included in DTE's semi-annual VGP reports related
12 to the low-income community renewable energy pilot?

13 A. In DTE's semi-annual VGP report, the Company should include at a minimum
14 the following information: the number of customers that have been enrolled into
15 the pilot and how they were selected, the quantity of kWh each customer has been
16 credited, the total monthly bill impact of the pilot for subscribed customers, the
17 total amount of funding DTE has received for the pilot, the total amount of funds
18 that have been allocated to customers, and provide a plan or explanation for how
19 low-income customers were selected to participate in the pilot.

20 **FCM**

21 Q. Has the Company taken a position on the FCM in this filing?

DIRECT TESTIMONY OF CODY S. MATTHEWS
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1 A. The Company recommends approval of an FCM for renewable energy Power
2 Purchase Agreements (PPAs) submitted to the MPSC for approval for utilization
3 in the MIGreenPower program.

4 Q. What does the Company recommend for unsubscribed portions of VGP projects
5 eligible for an FCM?

6 A. The Company proposes that for unsubscribed portions of the PPAs, the contracted
7 PPA price less the FCM, would be recovered from the renewable energy program
8 cost recovery mechanism. The method of recovery of the FCM for unsubscribed
9 portions will be addressed in a separate docket.²

10 Q. Does Staff have any recommendation about how the FCM should be applied to
11 projects?

12 A. Yes, Staff recommends that if the Commission finds an FCM prudent, it should
13 be applied only to the subscribed portion of VGP assets. Because unsubscribed
14 VGP assets will be used for compliance purposes in the renewable energy plan, it
15 is inappropriate for the Company to earn an FCM on those portions.

16 Q. Does this conclude your testimony?

17 A. Yes.

² Calka Testimony p. 41.

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * *

In the matter of **DTE ELECTRIC COMPANY'S**)
application for the regulatory reviews, revisions,)
determinations, and/or approvals necessary for) **Case No. U-20851**
to fully comply with Public Act 295 of 2008)
_____)

In the matter, on the Commission's own motion,)
regarding the regulatory reviews, revisions,)
determinations and/or approvals necessary for) **Case No. U-20713**
DTE ELECTRIC COMPANY to comply with)
Section 61 of 2016 PA 342.)
_____)

QUALIFICATIONS AND DIRECT TESTIMONY OF
ROBERT F. NICHOLS II, CPA
MICHIGAN PUBLIC SERVICE COMMISSION

December 23, 2020

QUALIFICATIONS OF ROBERT F. NICHOLS II, CPA
CASE NUMBER U-20851 et al
PART I

1 Q. Please state your name and business address.

2 A. My name is Robert F. Nichols II, and my business address is 7109 West Saginaw
3 Highway, Lansing, MI 48917.

4 Q. By whom are you employed and in what capacity?

5 A. I am employed by the Michigan Public Service Commission (Commission or
6 MPSC) as the Manager of the Revenue Requirements Section of the Regulated
7 Energy Division.

8 Q. How long have you been employed by the MPSC and what are your duties?

9 A. I have been employed by the MPSC since November of 2011. As Manager of the
10 Revenue Requirements Section, I am primarily responsible for the planning and
11 direction of electric and gas rate case audits and presentations, as well as cases
12 involving accounting standards and requests for accounting authority. From 2011
13 through March 2016, as an Auditor within the Revenue Requirements Section, my
14 responsibilities included auditing, analyzing, and making recommendations
15 regarding utility revenues, expenses, and rate base.

16 Q. Please describe your educational background.

17 A. I graduated from Davenport University, with highest honors, in 2009 with a
18 Bachelor of Business Administration degree in Accounting Information
19 Management. I attended a regulation and ratemaking conference hosted by the
20 Michigan State University Institute of Public Utilities (MSU IPU) in May of
21 2012. In August of 2012, I attended the National Association of Regulatory
22 Utility Commissioners (NARUC) annual two-week Regulatory Studies Program
23 held at Michigan State University. Each August from 2013 through 2016 and in

QUALIFICATIONS OF ROBERT F. NICHOLS II, CPA
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1 2019, I attended the Annual Regulatory Studies Program hosted by MSU IPU.

2 I also attended a one-week Advanced Regulatory Studies Program in the fall of

3 2013, 2014, and 2016, hosted by MSU IPU.

4 Q. Please describe your professional background.

5 A. Prior to coming to the MPSC, from 2000 to 2011, I was employed by Genesee

6 Cut Stone & Marble Company. My duties there included sales, drafting, and

7 estimating.

8 Q. Do you have any professional licenses?

9 A. Yes. I am a Certified Public Accountant, licensed by the State of Michigan.

10 Q. Have you prepared testimony or assisted in any other proceedings?

11 A. I have assisted or filed testimony in the following cases:

<u>Case No.</u>	<u>Company</u>	<u>Subject/Type</u>
U-16855	Consumers Energy Co. Gas	Rate Case
U-16969	SEMCO Energy Gas Company	Merger and Acquisition
U-16794	Consumers Energy Co. Electric	Rate Case
U-16999	Michigan Consolidated Gas Co.	Rate Case
U-16855	Consumers Energy Co. Gas	Self-Implementation Refund
U-17087	Consumers Energy Co. Electric	Rate Case
U-17197	Consumers Energy Co. Gas	Rate Case
U-17273	Michigan Gas Utilities Corp.	Rate Case
U-17274	Upper Peninsula Power Co.	Rate Case
U-17440	Consumers Energy Co. Electric	Self-Implementation Refund
U-17488	Northern States Power Co. Gas	Rate Case

QUALIFICATIONS OF ROBERT F. NICHOLS II, CPA
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1	U-16999	DTE Gas IRM	Reconciliation
2	U-17620	Consumers Energy Co.	OPEB Trust Funding
3	U-17643	Consumers Energy Co. Gas	Rate Case
4	U-17669	WPSC Electric	Rate Case
5	U-17735	Consumers Energy Co. Electric	Rate Case
6	U-17882	Consumers Energy Co. Gas	Rate Case
7	U-17999	DTE Gas Company	Rate Case
8	U-18014	DTE Electric Company	Rate Case
9	U-17990	Consumers Energy Co. Electric	Rate Case
10	U-18124	Consumers Energy Co. Gas	Rate Case
11	U-18322	Consumers Energy Co. Electric	Rate Case
12	U-18255	DTE Electric Company	Rate Case
13	U-18370	Indiana Michigan Power Co.	Rate Case
14	U-18419	DTE Electric Company	Certificate of Necessity
15	U-18424	Consumers Energy Co. Gas	Rate Case
16	U-18999	DTE Gas Company	Rate Case
17	U-20111	Upper Peninsula Power Co.	TCJA Credit A Case
18	U-20268	Alpena Power Company	TCJA Credit B Case
19	U-20134	Consumers Energy Co. Electric	Rate Case
20	U-20287	Consumers Energy Co. Gas	TCJA Credit B Case
21	U-20165	Consumers Energy Co. Electric	Integrated Resource Plan
22	U-20162	DTE Electric Company	Rate Case
23	U-20276	Upper Peninsula Power Co.	Rate Case

QUALIFICATIONS OF ROBERT F. NICHOLS II, CPA
CASE NUMBER U-20851 et al
PART I

1	U-20322	Consumers Energy Co. Gas	Rate Case
2	U-20350	Upper Peninsula Power Co.	Integrated Resource Plan
3	U-20479	SEMCO Energy Gas Co.	Rate Case
4	U-20359	Indiana Michigan Power Co.	Rate Case
5	U-20561	DTE Electric Company	Rate Case
6	U-20642	DTE Gas Company	Rate Case
7	U-20650	Consumers Energy Co. Gas	Rate Case
8	U-20697	Consumers Energy Co. Electric	Rate Case

DIRECT TESTIMONY OF ROBERT F. NICHOLS II, CPA
CASE NUMBER U-20851 et al
PART II

1 Q. What is the purpose of your testimony?

2 A. The purpose of my testimony is to present the MPSC Staff's (Staff) position on
3 the Company's proposed financial compensation mechanism (FCM) and the
4 incentive factor to be applied to eligible power purchase agreement requested by
5 DTE Electric Company (DTE or the Company).

6 Q. Are you sponsoring any exhibits?

7 A. No.

8 **FINANCIAL COMPENSATION MECHANISM:**

9 Q. Is the Company requesting approval of an FCM?

10 A. Yes. DTE witness Calka's testimony, page 37, states:

11 The Company is requesting approval of an FCM structure that would be
12 applied consistent with the Commission authority established in 2016 PA
13 341 6t(15), which states:

14 For power purchase agreements that a utility enters into after the
15 effective date of the amendatory act that added this section with an
16 entity that is not affiliated with that utility, the commission shall
17 consider and may authorize a financial incentive for that utility that
18 does not exceed the utility's weighted average cost of capital.

19 Q. Has the Commission previously approved an FCM similar to the one requested in
20 the instant case?

21 A. Yes. In MPSC Case No. U-20165, which was Consumers Energy's Integrated
22 Resource Plan (IRP) case, the Commission approved an FCM similar to the one
23 requested in the instant case.

24 Q. What incentive factor is the Company requesting to be applied to eligible power
25 purchase agreements to calculate the requested incentive?

DIRECT TESTIMONY OF ROBERT F. NICHOLS II, CPA
CASE NUMBER U-20851 et al
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1 A. Page 7 of DTE witness Solomon’s testimony states that:

2 “Based on the premise that the financial incentive is meant to offset
3 the lost opportunity cost for investments and also consistent with the
4 fairness rationale as described in Q11 above, it’s reasonable that DTE
5 Electric’s permanent capital structure be applied as the intent is to
6 compensate equity and debt holders. If the overall weighted average
7 cost of capital (WACC) for the utility is utilized, the incentive is
8 understated as this includes a significant weighting for deferred taxes
9 and short-term debt, neither of which are appropriate for an
10 incentive.”

11 Q. Does Staff agree that the permanent after-tax weighted-average cost of capital
12 (After-Tax Permanent WACC) approved by the Commission at the time the
13 contract is approved should be applied as the incentive factor?

14 A. No. The incentive factor should not be equal to the after-tax permanent WACC.
15 The incentive factor should be no greater than the after-tax overall weighted
16 average cost of capital (After-Tax Overall WACC).

17 Q. Why does Staff recommend the incentive factor be no greater than the after-tax
18 overall WACC?

19 A. Staff recommends the incentive factor should be no greater than the after-tax
20 overall WACC because the incentive is discretionary, meaning that the
21 Commission may authorize it, but it is not required to. The Commission may
22 authorize no incentive, or any incentive up to a maximum equal to the weighted
23 average cost of capital. In MPSC Case No. U-20165, the Commission approved a
24 contested settlement agreement which included an FCM with an incentive factor
25 equal to the after-tax overall WACC. The contested settlement was non-severable
26 and included eighteen detailed terms. In that case, the Company’s original
27 application calculated an incentive based on imputed debt, which resulted in an

DIRECT TESTIMONY OF ROBERT F. NICHOLS II, CPA
CASE NUMBER U-20851 et al
PART II

1 | incentive that was higher than what was ultimately settled upon. Staff was a
2 | signatory to the contested settlement agreement and agreed to an incentive factor
3 | equal to the overall WACC in the context of an over-arching agreement that was
4 | in the public interest and represented a fair and reasonable resolution of the
5 | proceeding. Staff would also find it reasonable to include an incentive factor up
6 | to the after-tax overall weighted-average cost of capital in this case.

7 | Q. Does this conclude your testimony?

8 | A. Yes.

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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DTE ELECTRIC COMPANY to comply with)
Section 61 of 2016 PA 342.)
_____)

EXHIBITS OF
ENERGY RESOURCES DIVISION
MICHIGAN PUBLIC SERVICE COMMISSION

December 23, 2020

MPSC Case No.:	<u>U-20713</u>
Requestor:	<u>Staff</u>
Question No.:	<u>CSM-1.5f</u>
Respondent:	<u>B. T. Calka</u>
Page:	<u>1 of 1</u>

Question: The following questions are regarding the low-income option for rider 17.

- f. Has DTE explored the option of letting organizations sponsor a low-income family for a set period of time rather than DTE selecting the low-income participant?

Answer: DTE has considered similar scenarios, though is cognizant of IT investments required to enable granular transactions such as the one described. DTE is open to and is evaluating allowing large donors to specify how and where their donations are applied to, though more investigation is required to understand the operational and cost impacts of offering that option.

Attachments: None.

Summary of Barriers and Opportunities to Third-Party Community Renewable Energy Projects

Attachment A

Potential Barriers to Third-Party Community Energy Projects

These barriers were brainstormed, condensed and voted upon by the forty participants at the May 15, 2019 3CRE stakeholder meeting.

The top twelve potential barriers:

1. No legislation explicitly authorizing MPSC to approve third party community solar
2. Proper valuation of benefits; social, environmental, financial, community – of community owned distribution generation
3. Lack of inclusion of low-income communities in decision making
4. Community engagement (education, not in my backyard (NIMBY)-ism, lack of understanding of benefits)
5. Provide guidance for local zoning
6. Inconsistencies in distributed generation valuation/distributed generation tariff across state and need for fair value
7. Subscription terms
8. Subscription levels
9. Financing
10. Cost - important to be cognizant of tradeoffs between economies of scale and community benefits for small-scale projects
11. Local arrays vs. economies of scale
12. Subscription cost to customer

Additional top barriers identified:

1. Proper valuation of benefits; social, environmental, financial, community – of community owned distribution generation
2. Fairness - how do we treat both participating and non-participating customers equitably
3. Lack of flexibility in rate making
4. Electricity credit mechanism for customer
5. Program/rate complexity (project manager and customer)
6. Lack of outreach to communities on learning about their energy bills/needs
7. Few successful examples in Michigan of third-party renewable energy
8. Transparency of process for project development and approval

9. Siting in a more populated community can be more challenging (but not impossible) compared to less populated areas
10. Inconsistent/problematic local ordinances
11. Cumbersome approval process by MPSC for pre-approval for projects

12. Lack of well-coordinated incentives for brownfield redevelopment
13. Lack of virtual net metering to improve access and make easier
14. Ability of low-income customers to receive project benefits that are not treated as income (e.g. virtual net metering) (i.e. impact to benefits etc.)
15. Lack of ability for outside (3rd party) providers (except in municipal utilities) to run the program
16. Getting coordination between utility, 3rd party developer, and customer
17. Solar energy tax credits will sunset soon
18. Local agency in projects; cities and community organizations setting standards, design, and impact goals
19. Not as easy/convenient as utility power
20. Equitable grid modernization (ensure proper transmission) – sunk cost problems with old infrastructure, i.e. who pays? etc.
21. Stabilizing pricing/billing for low-income residents - determining and maintaining affordable prices
22. Subscription cost to customer
23. Cost/Benefit: Recovery of costs (by any party)
24. Cost to consumers and utility/developer
25. Subscribers moving
26. Administrative management (billing, long-term management, customer/subscriber relationships)
27. Ensuring stable, reliable energy supply

Attachment B

Potential Opportunities to Third-Party Community Energy Projects

These opportunities were brainstormed, condensed and voted upon by the twenty-four participants at the July 17, 2019 3CRE stakeholder meeting.

The top eleven potential opportunities:

1. The state of Michigan could pass enabling legislation to permit/require community solar
2. Educating stakeholders and providing transparency with project economics and utility rates would provide realistic parameters to the economic feasibility of 3CRE projects and their economic benefit (or not) to customers
3. Using brownfields or other unused space within a community will help redevelopment
4. Community renewable energy carve outs will provide renewable energy access to communities who have not been able to participate in renewable energy projects traditionally
5. Knowing what compensation model is fair and unsubsidized would help provide certainty
6. Opportunity to have utility offer these programs (third parties participating) including financing, stability and consumer protection
7. Grants and third-party funding will provide opportunities for low-income customers
8. The community may be able to own the project (everyone come together and invest) giving communities an opportunity to organize for a collective goal.
9. Establish business practices/processes for requests
10. Utility could work to increase the value of renewable energy to improve economics
11. Deeper dive on effective marketing and customer education green tariff customer acquisition

Additional top opportunities identified:

1. Standardization within green tariff programs to enable fast pilot and product testing for speed to market of products
2. Good rapport with customers for utility by being responsive to customer wishes
3. Utilities should offer incentives on renewables that help take pressure off grid
4. MPSC could require geographic diversity (in addition to diversity of generation sources)
5. State incentive programs will solve the complication of financing for low income communities
6. Local government could pass zoning and permitting friendly to developing community solar to ease development
7. Commission to create a rule set (for uniform guidance)

8. Transparency on finite objectives with a CRE project from stakeholders would help drive understanding of motivation for projects
9. Provide demonstration/example of a clean energy project in the local community
10. Community level subscriptions (for community to participate)
11. Assessing how to achieve scale economies (1 MW vs 100 MW project)
12. · Opportunity to help customers meet their sustainability goals
13. Providing better access to financing (e.g. addressing tax equity challenges for small projects)
14. 3CRE will provide bill reduction benefits for subscribers
15. Higher engagement in energy issues by a community
16. Knowing how to best explain how community solar works would help avoid customer confusion and ensure best program fit
17. Replicating successful models (in MI, elsewhere)
18. Local solar and storage will provide an important component for electric vehicle build out
19. Large array will provide more cost-effective solutions for customers
20. Resource diversity (geographic and "fuel" type) – increase security and reliability
21. Renewables create jobs in Michigan

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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_____)

PROOF OF SERVICE

Linda G. Brauker, being duly sworn, deposes and says that on December 23, 2020, A.D.,
she emailed a copy of the attached MPSC Testimony and Exhibits to the persons as
shown on the attached list.

Linda G. Brauker

Subscribed and sworn to before me
this 23rd day of December, 2020.

MICHELLE L CONARTON
Notary Public – State of Michigan
County of Ingham
Acting in the County of Eaton
My Commission Expires: June 18, 2026

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