THE UNIVERSITY OF CHICAGO
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October 7, 2024

Via E-Filing

Ms. Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 West Saginaw Highway
Lansing, MI 48917

RE: MPSC Case No. U-21291

Dear Ms. Felice:

Please find enclosed the Replies to Exceptions to Proposal for Decision on Behalf of Frontline Organizations (Soulardarity, Urban Core Collective, and We Want Green, Too), along with proof of service for electronic filing in the above-referenced matter.

Please do not hesitate to contact my office with any questions or comments.

Sincerely,
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xc: Parties to Case No. U-21291

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of **DTE GAS COMPANY** for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of natural gas, and for miscellaneous accounting authority	Case No. U-21291 ALJ Jonathan F. Thoits

REPLIES TO EXCEPTIONS ON BEHALF OF SOULARDARITY, URBAN CORE COLLECTIVE AND WE WANT GREEN, TOO (COLLECTIVELY THE "FRONTLINE ORGANIZATIONS")

October 7, 2024

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I. INTRODUCTION

Soulardarity, Urban Core Collective, and We Want Green, Too (collectively the Frontline Organizations or FLO) file this Reply to Exceptions to oppose or support the positions of other parties as reflected in the Exceptions filed in this proceeding before the Michigan Public Service Commission (MPSC, or the Commission) regarding DTE Gas Company's (DTE) rate case application in Case No. U-21291. Centered in this reply are FLO's continued commitment to advocating for a just energy transition and scrutinizing imposed costs on the ratepayer that become superfluous as that energy transition takes place.

II. ARGUMENT

A. Affordability

The Company's argument against transition planning is nonsensical. In the PFD, the ALJ recommended that DTE Gas incorporate energy transition concerns into its Gas Delivery Plan,[1] but that the Commission wait to order further affordability relief until after the Energy Affordability and Accessibility Collaborative (EAAC) has provided recommendations.[2] In exceptions, the Company correctly notes that affordability and energy transition planning "go hand in hand,"[3] but it reaches an audacious conclusion. In its view, the PFD's recommendation that the Company set forth its preliminary assessment of how the energy transition will take place "conflict[s]" with the PFD's recommendation to wait for the EAAC's assessment on affordability because the Company's work would be "duplicative."[4] The Company's argument

[1] PFD at 409. ("This PFD agrees that DTE's Gas Delivery Plan is a good avenue to set forth its preliminary assessment of how it expects the transition to take place and what the resultant changes or ramifications may be for the utility and the ratepayers.")
[2] PFD at 410–411. ("[A]ny final assessments and changes by the Commission should await the completion of the work by the EAAC.")
[3] DTE Exceptions Brief at 60.
[4] DTE Exceptions Brief at 61.

appears to be essentially that because the two topics are intertwined, the Company should not be required to begin transition planning until after the EAAC has issued its recommendations.

This argument is disingenuous. The energy transition already alters how we think about affordability.[5] The energy transition will also alter every other aspect of the Company's business because the energy transition will make its distribution system obsolete. Michigan is "aiming to be carbon neutral by 2050, and electrification of gas-based systems [is] a key component of the energy transition."[6] If every part of the Company's business will be impacted by the trend towards electrification, then it makes no sense why affordability ought to be the sole reason why the Company cannot develop its energy transition plan. Following the Company's logic, the Commission should not approve the Company's proposed distribution investments until the EAAC makes its final recommendations on affordability. After all, the Company's proposed distribution investments will disproportionately impact LMI residents because LMI households disproportionately bear the costs for those investments.[7] Therefore, according to the logic put forward by the Company, the Commission should not approve DTE's distribution investments until the EAAC recommends a comprehensive system to address the burdens of these new investments.

FLO recognizes the importance of addressing affordability concerns during the energy transition, and has continuously pushed for swift affordability relief in this rate case because all the issues at hand highlight the affordability crisis that many ratepayers suffer.[8] The Company, on the other hand, only takes issue with affordability when it is convenient. For example, the

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[5] *See, e.g.*, FLO Initial Brief at 49–50. ("If the value of [investments into the gas distribution system] is not fully depreciated by the time that under-use forces their decommissioning, the stranded costs will have to be borne either by the Company's investors or its remaining customers.")
[6] *Id.* at 49.
[7] *Id.* at 51.
[8] *Id.* at 49–50.

Company's request to increase rates clearly impacts the affordability of energy, and therefore the issues of a rate increase and affordability are intertwined. If the Company's argument is that the Commission should not rule on any issues that are intertwined with affordability concerns until the EAAC has completed its recommendations, then the Commission could not rule on the Company's request to increase rates, and the Company should be moving for the dismissal of its entire case.

Instead, the Company's arguments highlight the illogicality of the Commission continuing to refuse to act to address the affordability crisis in rate cases. As discussed in FLO's initial brief, FLO strongly believes that the Commission should act on issues relating to the affordability of the Company's rates in this rate case.[9] All of the Company's proposals in rate cases will impact the affordability of energy.[10] For this reason, and the reasons listed in FLO's initial brief, the Commission should order affordability program relief in this rate case.

In its exceptions, Staff argued against the PFD's recommendation to increase the LIA credit from $30 to $40.[11] Staff urges the Commission to wait and "review the recommendations of the [Affordability, Alignment, and Assistance (AAA)] subcommittee of the [EAAC]."[12] Staff argues that waiting for AAA's recommendation is proper because "there is no evidence, aside from Company testimony, on the record to support the fact that the LIA credit is effective."[13] In Staff's view, until the AAA's comprehensive analysis is complete, it would be improper for the Commission to order an increase in LIA credit.

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[9] *See id.* at 60.
[10] *See, e.g.*, *id.* at 49. (discussing the unjust and unreasonable costs borne by investment in parallel infrastructure).
[11] Staff Exceptions Brief at 4.
[12] *Id.*
[13] *Id*.

Staff's "wait-and-see" approach to addressing affordability ignores the urgency of the affordability crisis. As FLO noted in both its initial briefing and its exceptions, the customers are currently suffering because the present affordability programs are insufficient.[14] As long as customers are forced into dangerous circumstances because of their inability to pay, FLO will continue to advocate for swift relief from the Commission. It has been years since the Commission first directed the EAAC to address affordability issues.[15] In that time, the Commission has declined to grant affordability-related relief in rate cases.[16] At the same time, energy insecurity has gotten worse,[17] and shutoffs due to non-payment have increased.[18] The Commission should break the cycle in this case and decline to take Staff's recommendation. Not only should it decline Staff's recommendation, but it should accept FLO's recommendation in Exceptions to raise the value of the credit to 70% of the typical customer's customer and distribution charge[19] and order the EAAC to expedite the development of a more comprehensive and effective solution to the affordability crisis.

B. Integrated Planning

Multiple parties note that the PFD's recommendation to require the Company to consider the energy transition in its Gas Delivery Plan is insufficient. MNSC recommends that the

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[14] *See, e.g.*, FLO Exceptions Brief at 5. ("As FLO has demonstrated in this case, many customers are forced to choose between heating their homes, and paying for necessities such as food, or choosing to 'heat or eat.'").

[15] *See In re Response to Covid-19 Pandemic*, MPSC Case No. U-20757, MPSC Order (Feb. 18, 2021) [hereinafter U-20757 MPSC Order], at 15.

[16] *See In re Consumers Energy Co.*, MPSC Case No. U-21389, MPSC Order (Mar. 1, 2024) [hereinafter U-21389 MPSC Order], at 289 ("To date, the topic of affordability has been addressed through the EAAC workgroup and its subcommittees, which the Commission finds should continue at this time."); *In re DTE Electric Co.*, MPSC Case No. U-21297, MPSC Order (Dec. 1, 2023) [hereinafter U-21297 MPSC Order], at 362 ("The Commission appreciates the emphasis on the affordability of utility services for LMI customers raised in the testimony provided by the DAAOs" but refuses to take any action on the issue).

[17] Schott Direct Testimony at 4 TR 1084–86, Figures 2–4.

[18] *Id.* at 1096, Figure 10.

[19] FLO Exceptions Brief at 11.

Commission initiate a "Future of Heat" docket to discuss both gas and electric planning in a consolidated docket. MNSC rests this recommendation in part on the Company's failure to evaluate "electrification as a non-pipeline alternative to expensive and long-term investments in gas infrastructure."[20] MNSC agrees with FLO's position that the Company's failure to consider electrification "will result in unjust and unreasonable overinvestment for which Michigan ratepayers will ultimately have to pay."[21] MNSC also notes that "DTE Gas has demonstrated that it is not an honest arbiter of gas demand,"[22] which cannot be meaningfully confronted unless evidence of the benefits of electrification can be directly entered into a record whose purpose is to compare gas and electricity.

CEO argues that the PFD fails to establish a timeline for how and when the energy transition will occur. Specifically, CEO requests that "the Commission [should] order DTE to revise its Gas Delivery Plan *before* it approves any of the Company's spending."[23] As for which forum the planning should take place in, CEO states "the Commission should order the Company to revise and reconsider its Gas Delivery Plan and its spending *in this case* after proper consideration of these important issues."[24] This is because, as CEO points out, trends relating to the energy transition impact the investments proposed by the Company in this case.[25] As a result, CEO requests that the Commission not find the Company's investment request just and reasonable without consideration of the energy transition in its Gas Delivery Plan.[26]

[20] MNSC Exceptions Brief at 27.
[21] FLO Initial Brief at 49.
[22] MNSC Exceptions Brief at 28.
[23] CEO Exceptions Brief at 3 (emphasis in original).
[24] *Id.* at 4 (emphasis added).
[25] *Id*.
[26] *Id*.

In whichever docket a joint gas and electric plan is filed in and in whatever form, FLO reiterates that the docket needs to address equity. As noted above, FLO believes that the energy transition will impact the affordability of energy. While FLO expects that such a proceeding would likely see investments in electrification increase and gas be phased out, the burden of that shift needs to be borne in such a way that avoids disproportionate impacts to LMI households. If the process properly considers equity, such a planning process could bring numerous downstream effects that benefit LMI communities, such as investments in improving the energy efficiency of housing stock.[27] However, without Commission action requiring consideration of equity concerns in transition planning, LMI customers will likely bear the burden of paying for the legacy gas system as wealthier customers electrify their homes and communities and leave the gas system.[28] FLO requests that, in whatever format and forum DTE Gas addresses concerns related to the energy transition, the Commission require the Company to also consider the equity impact of its proposed investments.

C. Responsibly Sourced Gas

In its initial brief, FLO argued that the Commission should reject the Company's request to purchase Responsibly Sourced Gas (RSG). FLO opposed the Company's request because the proposal "lacks transparency and reliability and is not just and reasonable."[29] The Company offers flimsy grounds to support the idea that RSG meaningfully reduces carbon dioxide emissions or changes the overall consumption of gas.[30] FLO agrees with the PFD's findings that "DTE's RSG proposal is premature given the current state of this issue within the natural gas industry, the lack of industry standards for all participants to adhere to…and recent legislative

[27] FLO Initial Brief at 53-54.
[28] *Id*. at 50.
[29] *Id.* at 40.
[30] *See id.* at 41, 45.

and EPA initiatives on methane reductions in the gas production areas."[31] The Commission should adopt the PFD's finding.

The Company does not cite to any new information or make new arguments in its exceptions that the ALJ did not consider in recommending against the Company's RSG proposal. The Company argues that "the proposal to purchase RSG will make a significant contribution to DTE Gas's total greenhouse gas reduction goals."[32] The Company claims that its RSG purchase would "prevent approximately 4,000 to 8,000 metric tons of carbon dioxide from being released into the atmosphere."[33] Even assuming this number is correct, the emissions reduced from RSG during the test year "would constitute a minimal 0.047% to 0.095% of DTE Gas's total emissions for its test year."[34] By the Company's own admissions, these percentages cannot be scaled enough to reduce carbon emissions meaningfully.[35] The Commission's study noted that Renewable Natural gas "could at best account for only 6% to 15% of Michigan's total natural gas consumption."[36] In other words, even if this pilot succeeded, it could not be scaled up in a sufficiently meaningful way to help the Company achieve its emission goals.

FLO argued in its initial brief that "reductions in the carbon intensity of the extraction process…ultimately do not make natural gas combustion environmentally benign."[37] Reducing the emissions associated with *producing* gas does not reduce the significantly greater emissions

[31] PFD 379–80.
[32] DTE Exceptions Brief at 59.
[33] *Id*.
[34] FLO Initial Brief at 46.
[35] Decker Cross Examination at 2 TR 153 ("Q: So if RSG were to eliminate all upstream emissions, that would only tackle -- that would take away about 5 percent of DTE's total lifecycle emissions; is that right? A: That is a correct statement, yes. Q: O.K. And as currently envisioned, the RSG contracts would only take away a percentage of that 5 percent, right, of emissions, correct? A. As the program is being executed today, yes.").
[36] FLO Initial Brief at 46.
[37] *Id.* at 47.

associated with *combusting* the gas.[38] The Commission should not permit the Company to "greenwash the fossil gas supply—at ratepayer expense—in an effort to justify continued investment in the gas distribution system in the long term."[39] The Company has not argued anything new to rebut these points in its exceptions; the Commission should adopt the PFD's recommendations.

D. Corporate Memberships

The Commission should disallow recovery for the Company's corporate membership dues because they are not "just and reasonable."[40] In the PFD, the ALJ correctly concluded that the Commission should disallow recovery for all $1,779,000 of the Company's requested corporate membership dues.[41] In its exceptions, the Company argued that "the PFD's disallowance of $1,779,000 for corporate membership expense should be rejected."[42] However, the Commission should adopt the ALJ's recommendation to disallow recovery for the Company's corporate membership dues because they are not "just and reasonable"[43] for a number of reasons.

First, the Company has not provided sufficient information to justify its corporate membership dues. In its direct case, the Company did not provide any evidence to support the value of its corporate memberships to ratepayers.[44] In the PFD, the ALJ correctly found that the Company has failed to "provide detailed information of projected costs associated with membership fees and justification for why these costs are in customers' interests."[45] In its

[38] *See id.* at 40, 45–46.
[39] *Id.* at 48.
[40] MCL 460.557(4).
[41] PFD at 279.
[42] DTE Exceptions Brief at 47.
[43] MCL 460.557(4).
[44] Koeppel Direct Testimony at 4 TR 1018.
[45] PFD at 278–79.

exceptions, the Company claims that "the PFD mischaracterizes DTE Gas's obligations concerning membership fees" and that "while the Commission may have directed DTE *Electric* to file an itemized list of projected membership fee costs and a justification for why these costs are in customers' interests, the Commission has not imposed similar obligations on DTE *Gas*."[46] However, DTE's argument ignores the issue: if the Company wants to recover its corporate membership dues through rates, whether in a gas rate case or an electric rate case, then the Company has an obligation to provide information on the memberships to the Commission so the Commission can determine whether they are "just and reasonable."[47] The burden of proof is on the Company, not intervenors or the Commission.[48] The Company has failed to meet its burden. Therefore, the Commission cannot find that its corporate membership expenses are "just and reasonable"[49] and recovery should be disallowed.

After failing to provide sufficient information on its corporate memberships in its direct case, the Company improperly provided additional information on its corporate memberships in Witness Decker's rebuttal testimony.[50] In the PFD, the ALJ agrees that, the Company's choice to include this information in its rebuttal testimony, rather than in its direct case, was "improper."[51] In its exceptions, the Company claims that its "submission of such detailed cost and membership information in its rebuttal testimony is responsive and not 'improper.'"[52] However, even if the

[46] DTE Exceptions Brief at 45.
[47] MCL 460.557(4).
[48] DTE Initial Brief at 8. ("DTE Gas has the initial burden of proving its case by a preponderance of the evidence.")
[49] MCL 460.557(4).
[50] Decker Rebuttal Testimony at 2 TR 140–46.
[51] PFD at 279.
[52] DTE Exceptions Brief at 46–47. The Company also states that "DTE Gas provided detailed information on its corporate memberships in response to FLO's request in its direct testimony that the Company specifically identify, in its rebuttal testimony, its corporate membership dues and the organizations to which the Company paid those (4 TR 1019)." *Id.* at 46. The fact that FLO requested this information does not excuse the Company from its obligation to provide this information in its initial case. Moreover, the Company's failure to provide this information until its rebuttal testimony did not give

Company's rebuttal testimony was proper, the information provided in Witness Decker's rebuttal testimony is still insufficient to justify its corporate membership expenses. In his testimony, Witness Decker attempted to justify recovery of these costs from ratepayers by stating that the Company benefits through networking, engaging in and sharing research, learning about best practices, and benchmarking.[53] However, these arguments are insufficiently supported by evidence and are widely contested by reports and testimony.[54] Because the Company has not provided sufficient information justifying its corporate membership dues, the Commission should follow the PFD's recommendation and disallow recovery of these expenses.

Additionally, the PFD agreed that Witnesses Decker's rebuttal testimony failed to provide sufficient information, noting that "DTE's general descriptions of the benefits gained from these memberships indicate apparent overlaps and redundancies among the different memberships, with repeated references to R&D initiatives focused on safety and reliability, and mutual assistance coordination across the industry."[55] In its exceptions, the Company claims that "the Company's corporate memberships provide a variety of benefits to ratepayers" and "[w]hile enhanced safety and reliability, for example, may be ratepayer benefits under a few different corporate memberships, each corporate membership has a distinct purpose and unique combination of ratepayer benefits."[56] However, the Company has failed to provide sufficient information, both in its direct case as well as in Witness Decker's rebuttal testimony, explaining the specific benefits to ratepayers and justifying its recovery of these membership dues. As the Company has not provided information on the specific benefits of its corporate memberships to

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FLO, Staff, the Attorney General or any other intervenor the opportunity to rebut the Company's testimony.

[53] Decker Rebuttal Testimony at 2 TR 140–46.

[54] *See, e.g.*, Koeppel Direct Testimony at 4 TR 1019; FLO Initial Brief at 91–97.

[55] PFD at 278–79.

[56] DTE Exceptions Brief at 46.

ratepayers, the Commission should not find recovery for the Company's corporate membership dues to be "just and reasonable."[57]

Finally, the Commission should not accept the Company's assertion that past approval of membership dues dictates approval in the instant case. In its exceptions, the Company cites two prior Commission orders:[58] (1) the approval to recover $600,000 per year for membership dues in the GTI-OTD program in the Commission's December 9, 2021 order in Case No. U-20940[59] and (2) the approval of $350,000 per year for membership dues in the GTI-UTD program in the Commission's September 13, 2018 order in Case No. U-18999.[60] However, regardless of past determinations in previous cases, in every rate case the Commission has an obligation to ensure that all proposed expenses and rate increases are "just and reasonable."[61] The Commission must review detailed information on the activities of these organizations to determine whether recovery of these costs is just and reasonable. In order to do this, the Commission should require the Company to provide a detailed breakdown of how these dues are allocated for each of the activities within GTI-OTD and GTI-UTD before allowing recovery on these dues.[62] Because the Company has failed to provide sufficient information about how the funds are allocated within these efforts, neither intervenors nor the Commission can meaningfully scrutinize GTI's activities. Therefore, the Commission should adopt the PFD's recommendation disallowing GTI membership dues regardless of its past determinations on certain research and development expenses.

[57] MCL 460.557(4).
[58] DTE Exceptions Brief at 46.
[59] *In re DTE Gas. Co*., MPSC Case No. U-20940, Order (December 9, 2021), at 177–81.
[60] *In re DTE Gas. Co*., MPSC Case No. U-18999, Order (Sept. 13, 2018), at 81–83.
[61] MCL 460.557(4).
[62] *See* FLO Initial Brief at 96.

III. CONCLUSIONS AND PRAYERS FOR RELIEF

Consistent with the concerns and positions articulated above, the Frontline Organizations respectfully request that the Commission approves the recommendations in the PFD subject to the exceptions identified here and the positions taken by FLO in its Initial Brief, Reply Brief, and Exceptions.

Date: October 7, 2024

/s/ Jacob Schuhardt

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STATE OF MICHIGAN
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In the matter of the application of **DTE GAS COMPANY** for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of natural gas, and for miscellaneous accounting authority.	Case No. U-21291 ALJ Jonathan F. Thoits

PROOF OF SERVICE

I, Jacob R. Schuhardt, certify that an electronic copy of the Replies to Exceptions on Behalf of Frontline Organizations (Soulardarity, Urban Core Collective, and We Want Green, Too) was served on the following on October 7, 2024.

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The statements above are true to the best of my knowledge, information, and belief.

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Date: October 7, 2024

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