

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter, on the Commission's own motion, )  
to revise the standard rate application filing forms )  
and instructions previously adopted in Case ) Case No. U-18238  
No. U-15895. )  
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At the September 24, 2021 meeting of the Michigan Public Service Commission in Lansing,  
Michigan.

PRESENT: Hon. Daniel C. Scripps, Chair  
Hon. Tremaine L. Phillips, Commissioner  
Hon. Katherine L. Peretick, Commissioner

**ORDER**

On December 21, 2016, Public Act 341 of 2016 (Act 341) was signed into law. Among other things, Act 341 reduced the amount of time available to the Commission and the Commission Staff (Staff) to process most electric, natural gas, and steam general rate cases from 12 months to 10 months. As a result, on January 20, 2017, the Commission opened this docket to consider modifications to its then-existing standard rate application filing forms and instructions, so as to ensure the Commission could continue to thoroughly scrutinize rate case applications in a timely manner. On July 31, 2017, the Commission issued an order in this case approving amended Rate Case Filing Requirements for electric, natural gas, and steam utilities (filing requirements).<sup>1</sup>

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<sup>1</sup> The filing requirements are available at: <https://mi-psc.force.com/sfc/servlet.shepherd/version/download/068t0000001UW8pAAG>.

On March 19, 2021, the Commission issued an order in this docket soliciting written comments regarding the current filing requirements and whether they should be re-opened for revision and updating (March 19 order). In response to the March 19 order, the Commission received comments from the Staff; DTE Electric Company and DTE Gas Company (DTE); Consumers Energy Company (Consumers); the City of Grand Rapids and the City of Ann Arbor (together, the Cities); the Michigan Department of Attorney General (Attorney General); the Association of Businesses Advocating Tariff Equity (ABATE); the Michigan Electric and Gas Association (MEGA); the Residential Customer Group (RCG); and joint comments from the Citizens Utility Board of Michigan (CUB), Earthjustice, Environmental Law and Policy Center, Michigan Environmental Council, Michigan Municipal Association for Utility Issues, Natural Resources Defense Council, Sierra Club, and Soulardarity (collectively, the CUB Coalition).

After reviewing the comments, the Commission issued an order on July 27, 2021, seeking reply comments. On August 11, 2021, the Commission received reply comments from DTE, Consumers, the Staff, ABATE, and MEGA.

### Comments

The Staff does not opine on whether the filing requirements should be re-opened, but, in the event that they are, the Staff provides 14 suggested areas for change which address substantive and procedural matters. These matters include potential changes to attachments, exhibits, workpapers, protective orders, briefs, documentation of overspends, timing, discovery, the required rate case summary, and notifications. The Staff also suggests changes that would allow the Commission to further its diversity, equity, and inclusion goals set in the 2021-2025 Strategic Plan, by requiring utilities to submit specific information as part of the filing requirements. In summary, the Staff offers the following suggestions:

1. Attachments to discovery questions and answers should be required to be attached to the email providing service to the parties rather than through a link to a portal.
2. The required Sales and Purchased Power Attachment should be revised to seek the most recent five calendar years of historical sales information by month, as well as all available months of actual sales for the current year broken down by bundled and choice customers.
3. All exhibits and workpapers used to support a calculation, including exhibits and workpapers filed with the direct testimony supporting a utility's application, should be provided in the original format with formulas intact, and filed the same day that the testimony is filed or, at the latest, one day after testimony is filed.
4. All testimony, exhibits, workpapers, discovery responses, audit responses, and other information provided with an application or later in a rate case, should be keyword searchable.
5. Protective orders should be entered on or around the prehearing date.
6. Stakeholders should develop a standard outline for briefs, to promote uniformity and lower the likelihood that issues will be overlooked.
7. If a utility spends more than what was approved in an earlier rate case and seeks recovery of part or all of the amount it overspent in a later rate case, then documentation of the overspend and the reason for it should be required in the application.
8. Within a rate case application, a utility should be required to list all capital expenditures or expenses approved subject to conditions in its last rate case, along with any separate mandates or requests not tied to approved capital expenditures or expenses. The utility should further explain whether each condition, mandate, or request was fulfilled and how.
9. Testimony, rebuttal, briefs, and exceptions should be required to be filed by all parties by 4:00 p.m. on the day the filing is due, with supporting documents for each filing served on the parties by noon the following day or best efforts.
10. The current default discovery turnaround time should also be applied to audit requests as well, and the Commission should clarify that "Business day" means "the first day after Discovery is served and those days in which the Michigan Public Service Commission is open to conduct business."
11. The Rate Case Summary should be due three business days prior to the filing of a rate case application.

12. Language should be added to the filing requirements requiring hard copies of testimony, exhibits, and workpapers to be sent to the Staff if requested.

13. In the event additional time is needed to respond to audit or discovery requests beyond the set turnaround time, the responding party should be required to notify the requesting party of the amount of additional time needed.

14. The Commission should clarify in the filing requirements that, pursuant to MCL 460.6a(1), the Commission will work to avoid multiple major gas or electric utility rate case filings within a 21-day timeframe, as well as utility rate case filings on or around March 1.

15. The filing requirements should seek information related to customer demographics and income levels that will help the Staff assess the impact of a utility's proposed rate hike on vulnerable communities. The utility should also provide information showing how it factored equity into its proposed low-income rates and eligibility requirements, as well as information about the ethnic and racial makeup of its residential customers, the recipients of energy assistance, and the beneficiaries of utility initiatives and pilot programs.

*See, Staff's comments, pp. 3-6.*

Consumers opposes re-opening the filing requirements, but, in the event that they are, Consumers suggests four potential substantive changes to required attachments, as well as one procedural change to extend the time to respond to discovery. Consumers seeks changes to some of the attachments required under Part II of the current filing instructions in order to decrease the work time required to provide the information, including to state and federal tax information components, financial metrics, the 5% threshold for expense item changes, and the required minimum years of data. Consumers contends that some of the currently required items are not actually useful. Consumers suggests that the 21-day period currently allowed for rebuttal should not be shortened, and that the discovery turnaround time should be extended to 10 business days; or, alternatively, the number of interrogatories should be limited.

DTE also opposes re-opening the filing requirements, but, in the event that they are, DTE offers several suggested changes addressing data requirements, paper copies, and discovery

guidelines. DTE suggests that electronic documents should be the standard rather than paper versions, and that certain required documents should be eliminated because they are already available on the utility's website, such as the Form 10K. DTE suggests formatting changes to certain required accounting data and records, to eliminate the three- and five-year rolling averages for certain data, eliminate certain 20- or 30-year required data in favor of shorter periods, and eliminate certain confidentiality requirements associated with the Code of Conduct (Mich Admin Code, R 460.10101 *et seq.*). DTE states that the Staff's requirement of paper documents is unduly burdensome and costly, and environmentally unsound. Like Consumers, DTE suggests extension of the discovery turnaround time to 10 business days, a limit to the number of discovery requests, establishment of a discovery cutoff date prior to the hearing, and a limit to the time period for which discovery may be sought.

The Cities support re-opening the filing requirements and make suggestions regarding data access and the timing of intervention. They also urge the Commission to allow reply comments. The Cities suggest that the time period for determining whether to intervene in a rate case needs to be longer. The Cities seek more comprehensible information about energy burden.

The Attorney General supports re-opening the filing requirements and makes several suggestions, including establishing separate requirements for small utilities and setting limits on the projected test year, as well as substantive changes to pre-filed testimony and exhibits, and changes to the guidelines governing the schedule. The Attorney General suggests that small utilities should be defined as those with less than 100,000 customers, and the Part III filing requirements should be relaxed for small utilities.

The Attorney General asserts that the projected test year has resulted in forecasted rate increases that are excessive and allow utilities to over-earn from the approved return on equity

(ROE). The Attorney General argues that, in enacting the authorization for a projected test year, it is unlikely that legislators envisioned a bridge period of 24 months added to a test year of 12 months, for a total of 36 forecasted months underlying the alleged revenue deficiency. The Attorney General posits that accuracy, under these circumstances, is dubious. The Attorney General suggests that the Commission limit the bridge period to no more than six months, thus limiting total forecasted data to 18 months. The Attorney General also proposes that utilities be required to file an alternative case showing the historical test year revenue requirement updated with known and measurable changes as of the date of the filing, in order to provide additional information which can be measured against the projected test year data. The Attorney General supports the requirement of additional information comparing authorized ROEs to earned ROEs for the previous five years.

The Attorney General suggests improvements to witness testimony and exhibits to make them easier to identify, as well as changes to the information provided in support of a historical revenue sufficiency, historical financial metrics, projected capital expenditures, adjustments to rate base, and projected operations and maintenance (O&M) expenses. The Attorney General also suggests that the time between the filing of rebuttal and the first day of cross-examination should be increased to 15 calendar days or 12 business days.

ABATE also supports re-opening the filing requirements in order to establish limits on the projected test year. ABATE states that projected test years are consistently causing significant utility over-earning as evidenced by recent “voluntary” refunds. ABATE suggests that the Commission set conditions under which it would reject the use of a projected test year.

MEGA supports re-opening the filing requirements and suggests the need for a definition of “small” utility based on the number of customers served (with a limit of one million), as well as

changes to the requirements for small utilities and multi-jurisdictional utilities to streamline procedures, and changes to specific exhibits. MEGA also posits that the Staff's requirements for paper documents are unduly burdensome and costly for small utilities. MEGA suggests a time limit on discovery prior to the hearing. MEGA suggests certain changes to the attachments in Part III of the filing requirements, particularly for small utilities, based on the amount of work required to compile the data, especially on a total company basis. MEGA also suggests that some of this information be limited to generation that is located in Michigan for utilities operating in multiple states. MEGA suggests that the Staff review the burden of the current requirements on small utilities against the actual usefulness of the information that is required. MEGA proposes that utilities be allowed to provide electronic notice rather than publishing in newspapers, and that they be given the opportunity to remedy filings that are considered incomplete.

Like the Attorney General and ABATE, RCG supports re-opening the filing requirements in order to establish limits on the projected test year. RCG suggests that the projected test year should extend no more than 12 months beyond the date of the rate case filing in order to maintain just and reasonable rates. RCG states that projected test years are resulting in excessive and unreasonable rate increases which favor shareholders over ratepayers. RCG suggests that the Staff be required to file a full historical test year case (providing a source of objective criteria), arguing that only the Staff has the resources and the ability to do so. RCG also suggests that the Commission clarify that all pleading and briefs may be filed up to midnight on the date the filing is due, stating that this would be consistent with the state and federal courts in Michigan.

The CUB Coalition supports re-opening the filing requirements and offers numerous suggestions regarding changes to the pre-filed information and to the timing of filings, intervention, and discovery responses. The CUB Coalition states that the current ratemaking

process is impenetrable for the average ratepayer and requires greater transparency which could be provided through public meetings and changes to the filing requirements. The CUB Coalition suggests the following process efficiencies: (1) offer more opportunities for remote participation; (2) require the utility to maintain all rate case information in its native format on a website or intranet site that is available to the public, and which would allow for Excel filings (which are not currently accepted in e-dockets); (3) require more detailed information in the pre-filing notice; (4) shorten the time between the application filing and the prehearing conference; (5) allow intervention after the prehearing conference; (6) lengthen the time between the rebuttal and cross-examination; (7) shorten the discovery turnaround time after rebuttal to four business days; (8) require supporting materials to be filed with rebuttal testimony; (9) handle technical issues before cross-examination begins and expedite the binding-in of testimony; (10) require parties to provide a list of the witnesses they intend to cross; and (11) update the protective order to be consistent with the one approved in Case No. U-20697 (Consumers' last completed rate case).

The CUB Coalition proposes the following substantive efficiencies, which would require the utility to provide: (1) complete data through the end of the test year in its initial filings, with no time gaps; (2) a budget from the historical test year through the projected test year; (3) cost of service study (COSS) spreadsheets with direct links to the projected test year data; (4) distribution system performance data in conjunction with community demographic data, in order to demonstrate that service is equitable; (5) standardized streetlight outage data for a five-year period through the historical test year; (6) information showing the changes to programs over what was approved in the prior rate case; and (7) information identifying costs, revenues, and programs included in the new application that were expressly disallowed in a prior rate case.

To improve public engagement, the CUB Coalition proposes that the Commission: (1) ensure that rate case information is available in the languages spoken in the service territory; (2) hold Commissioner-led public hearings in the service territory; and (3) find ways to increase the engagement of low-income and people-of-color customers and hear their first-hand experiences of dealing with a heavier energy burden. The CUB Coalition also suggests that the utility be required to provide: (1) information on how the requested rate increase will impact affordability, including data on energy burden, demographics, and shutoffs; (2) information on programs the utility proposes to address energy unaffordability; and (3) information sufficient to allow the parties to evaluate whether utility investments and energy assistance sources are distributed equitably.

#### Reply Comments

In its reply comments, MEGA reiterates its support for limiting the scope of this effort to addressing the filing requirements for small and multi-jurisdictional utilities, and only to the substantive and procedural matters that relate to the filing requirements and do not involve the interpretation of the projected test year. MEGA also suggests that procedural issues such as motions, dates, and lists should be dealt with in the prehearing conference and not through the filing requirements. MEGA contends that utilities should not be required to submit a second, alternate rate case. MEGA again suggests a small utility should be one with 1 million or fewer customers, which is a limit that is used in other statutory settings such as for integrated resource plans (IRPs) and utilities falling under the Public Utility Regulatory Policies Act (PURPA), as demonstrated in MCL 460.6t(4) and MCL 460.6v(3).

In its reply comments, ABATE again addresses the projected test year, and argues that the Michigan Court of Appeals' recent ruling in *In re Application of Consumers Energy Co to Increase Rates*, \_\_\_ Mich App \_\_\_; \_\_\_ NW2d \_\_\_ (Docket No. 351261) (*Consumers Energy*),

illustrates that further direction is required from the Commission in this area. ABATE offers an example of a solution from a potential rulemaking in Pennsylvania. ABATE's reply comments, Appendix A. ABATE supports efforts at greater stakeholder and intervenor engagement and opposes the utilities' suggestions to increase discovery turnaround time and limit the number of discovery requests. ABATE contends that ratepayers should be able to fully understand the impact of the utility's rate case application. ABATE suggests that discovery disputes may be addressed through the standard objections, and the filing requirements should enable an open and informed process.

In its reply comments, Consumers contends that several issues in the initial comments – in particular the issue of the projected test year – are outside the scope of this proceeding. Consumers states that the projected test year issue should be decided in a rate case because it is a substantive issue, while arguing that the projected test year is statutorily protected and may not be eroded through the greater use of historical data. Consumers argues that *Consumers Energy* (which involves a test year that extended 22 months beyond the date of the rate case application) shows that legislators, in fact, did envision an extended period of forecasted data by choosing to exclude any time limitation in MCL 460.6a(1) respecting the projected test year. Consumers does not support the filing of an alternative rate case by the utility, or a separate historical case by the Staff. Consumers argues that information comparing the authorized and earned ROEs is irrelevant, and that earnings are often affected by elements beyond the utility's control such as weather.

Consumers does not support shortening the time between the rate case filing and the prehearing or the discovery turnaround time, noting that utilities need time to publish notices and to evaluate petitions to intervene. Consumers states that it is experiencing discovery abuses in rate

cases, noting that in its 2020 electric rate case, Case No. U-20697, it received 1,616 discovery requests with 2,947 subparts. Consumers notes that the Michigan Court Rules provide a 28-day turnaround for most discovery and impose a limit of no more than 20 interrogatories on each party, citing MCR 2.209(B)(4), MCR 2.310(C)(2), and MCR 2.302(A)(2). Consumers points out that Commission rules provide that “Discovery shall, as far as practicable, be conducted in the same manner as in the circuit courts of this state pursuant to the Michigan court rules or as otherwise provided by law.” Mich Admin Code, R 792.10423. Consumers does not favor allowing late intervention; and suggests that the number of issues has grown exponentially due to the large number of intervenors and the lack of coordination among the intervenors. Consumers’ reply comments, p. 13, n. 2. Consumers also opposes providing information for all gap periods, stating that it is impractical and irrelevant. Consumers posits that additional information intended to address issues of diversity, equity, and inclusion should be addressed in Case No. U-20757 after the filing of the Staff’s next report (due December 17, 2021). Consumers urges the Commission to make its discovery process more consistent with other adjudicative bodies in Michigan.

In its reply comments, the Staff again takes no position on whether the filing requirements should be reopened, but opposes limitations on discovery, either in terms of number or in terms of a cutoff date, arguing that the extremely tight statutory timeframe makes discovery more essential than ever. The Staff states that “[i]f utilities would like more time to answer discovery, they could file a request for an extension to the 10-month schedule under MCL 460.6a(5), in which case Staff would certainly be willing to entertain a request for a longer discovery turnaround time.” Staff’s reply comments, p. 4. The Staff notes that there is no statutory deadline in most civil cases, making the Michigan courts a poor example for comparison to a rate case. The Staff reiterates that discovery deadlines should also be applied to audit requests and should be governed by Mich

Admin Code, R 792.10409. “Beyond this, the Commission should consider the following clarification for counting discovery and audit time: ‘Business day’ shall mean ‘the first day after Discovery or Audit is served and those days in which the Michigan Public Service Commission is open to conduct business.’” Staff’s reply comments, p. 5. The Staff also opposes reducing the turnaround time or changing the current milestones. The Staff does not support the suggestion for direct links to test year data but indicates that it is willing to discuss the relative value and burden of specific data requests. The Staff notes that simply because it does not dispute data should not be taken as an indication that the data was not reviewed.

The Staff contends that the paper copies of applications are used by the Staff, its counsel, the Administrative Law Judge (ALJ), and the Commissioners, and are essential for each of the individuals that request a copy. The Staff reiterates its request for a searchable format and suggests that procedural matters such as changing the date of the prehearing be left to the ALJ, consistent with current practice. The Staff notes that the opportunity for intervention after the prehearing already exists. The Staff opposes allowing for filings up to midnight and recommends that the Commission adopt 4:00 p.m. instead. The Staff opines that issues regarding the projected test year should be litigated in rate cases, with the benefit of a record and a contested hearing. The Staff opposes creating additional exceptions for small and multi-jurisdictional utilities, and supports retention of the current process for notifying utilities within 30 days whether their applications are complete. The Staff opposes suggestions which direct how the Staff should conduct its review of the case.

DTE opposes changes to the projected test year and posits that, in order for the new rates to become effective close to the commencement of the projected test year, a minimum of 22 months of data is required (12-month test year, 10-month litigation period). DTE contends that the bridge

period must also be 13 or 14 months long, to allow for the collection of data. DTE opposes a requirement to produce an alternative test year.

DTE states that it can improve the usability of the portal. DTE argues that the issue of collecting customer demographics and income information should be addressed in Case No. U-20147, the electric distribution plan filing docket. DTE objects to any requirement that it compare its earned ROEs to its authorized ROEs, on grounds that this will not provide any information about the future. DTE states that the proposal to allow intervention any time after the prehearing is contrary to law, and notes that late intervention is already allowed. DTE opposes any additions to the existing burden of the rate case summaries.

DTE argues that it already provides sufficient information for all bridge and interim periods, and that all interim periods are not necessary for all exhibits. DTE states that it would be “cumbersome and complex” to walk all values from historical all the way to projected. DTE’s reply comments, p. 5. DTE states that it already uses three major models to integrate the projected test year with the COSS, and that additional distribution system performance data would be more appropriate for an IRP or distribution plan case. DTE states that it is not currently capable of providing the streetlight outage data that is requested by the CUB Coalition. DTE opposes any requirement to provide a description of changes from a prior rate case order because a rate case is not a reconciliation; and, likewise, does not see the benefit to providing information regarding requested costs that were expressly disallowed in a prior rate case. DTE suggests that the Commission has already begun to address issues of public engagement in Case No. U-20757.

With respect to the Attorney General’s suggestions to increase the requirements for certain exhibits, DTE argues that a substantial amount of the information that is already provided does not appear to be used by any of the parties. DTE further argues that some of the requested information

is already provided elsewhere, some of it is confidential, some of it is not maintained by the company, and some of it is excessively burdensome or lacking in value. While DTE indicates that it agrees with many of the procedural suggestions made by various commenters, it also indicates that it opposes making documents keyword searchable; it opposes any requirement to list expenses that were subject to conditions from a prior rate case; and it opposes shortening the discovery turnaround and avoiding the March 1 filing date. DTE also opposes the use of paper copies. DTE's reply comments, pp. 9-10.

### Discussion

The Commission continues to consider whether it is necessary to re-open the filing requirements for a complete revision and thanks commenters for the detailed responses provided thus far in the docket. At this time, the Commission invites additional comment on the topics listed herein. The Commission believes that these topics reflect the issues which have arisen or undergone the most significant changes since the last set of revisions were made. The Commission is interested in the following topics:

1. Are rate case filing requirements the best way to collect data that will enable the Commission to more effectively understand and address issues related to customer affordability and access as well as environmental justice, including demographic, household energy burden, and customer income level data? Do utilities currently possess or collect this data, or would this data have to be accessed or acquired through third parties? Should utilities be required to make such data accessible to the public? How will making such data available to the Commission or the public work in conjunction with existing privacy requirements?
2. How can the filing requirements address the need for additional and more detailed information on the issues of information technology costs, critical infrastructure, and cybersecurity?
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?

4. Should small and multi-jurisdictional utilities be subject to special exemptions or waivers from aspects of the filing requirements? What are the pros and cons of providing these exemptions or waivers?
5. What, if any, additional performance data addressing utility distribution system reliability should be required in the rate case filing? Should the applicant utility be required to provide standardized streetlight outage data, for example, for a specified time period? Should the applicant utility be required to provide distribution performance data that is tied to community demographic data?

The comments should reference Case No. U-18238 and must be received no later than 5:00 p.m. (Eastern time) on October 22, 2021. Reply comments should also reference Case No.

U-18238 and must be received no later than 5:00 p.m. (Eastern time) on November 5, 2021.

Address mailed comments and reply comments to: Executive Secretary, Michigan Public Service Commission, P.O. Box 30221, Lansing, MI 48909. Electronic comments may be e-mailed to

[mpscdockets@michigan.gov](mailto:mpscdockets@michigan.gov). If you require assistance prior to filing, contact the Staff at (517)

284-8090 or by e-mail at [mpscdockets@michigan.gov](mailto:mpscdockets@michigan.gov). All information submitted to the

Commission in this matter will become public information available on the Commission's website and subject to disclosure; and all comments and reply comments will be filed in Case No.

U-18238.

THEREFORE, IT IS ORDERED that any interested person may submit comments on the topics listed in this order no later than 5:00 p.m. (Eastern time) on October 22, 2021, and reply comments no later than 5:00 p.m. (Eastern time) on November 5, 2021.

The Commission reserves jurisdiction and may issue further orders as necessary.

MICHIGAN PUBLIC SERVICE COMMISSION

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Daniel C. Scripps, Chair

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Tremaine L. Phillips, Commissioner

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Katherine L. Peretick, Commissioner

By its action of September 24, 2021.

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Lisa Felice, Executive Secretary

# PROOF OF SERVICE

STATE OF MICHIGAN )

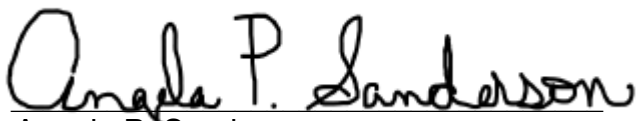
Case No. U-18238

County of Ingham )

Brianna Brown being duly sworn, deposes and says that on September 24, 2021 A.D. she electronically notified the attached list of this **Commission Order via e-mail transmission**, to the persons as shown on the attached service list (Listserv Distribution List).

  
Brianna Brown

Subscribed and sworn to before me  
this 24<sup>th</sup> day of September 2021.



Angela P. Sanderson  
Notary Public, Shiawassee County, Michigan  
As acting in Eaton County  
My Commission Expires: May 21, 2024

**Service List for Case: U-18238**

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## GEMOTION DISTRIBUTION SERVICE LIST

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<a href="mailto:mheise@cloverland.com">mheise@cloverland.com</a>	Cloverland
<a href="mailto:vobmgr@UP.NET">vobmgr@UP.NET</a>	Village of Baraga
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<a href="mailto:bob.hance@teammidwest.com">bob.hance@teammidwest.com</a>	Midwest Energy Coop
<a href="mailto:tharrell@ALGERDELTA.COM">tharrell@ALGERDELTA.COM</a>	Alger Delta Cooperative
<a href="mailto:tonya@CECELEC.COM">tonya@CECELEC.COM</a>	Cherryland Electric Cooperative
<a href="mailto:bscott@GLEENERGY.COM">bscott@GLEENERGY.COM</a>	Great Lakes Energy Cooperative
<a href="mailto:sculver@glenergy.com">sculver@glenergy.com</a>	Great Lakes Energy Cooperative
<a href="mailto:kmarklein@STEPHENSON-MI.COM">kmarklein@STEPHENSON-MI.COM</a>	Stephenson Utilities Department
<a href="mailto:debbie@ONTOREA.COM">debbie@ONTOREA.COM</a>	Ontonagon County Rural Elec
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<a href="mailto:igoodman@commerceenergy.com">igoodman@commerceenergy.com</a>	Just Energy Solutions
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