STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter, on the Commission's own motion, to open a docket to implement the provisions of Public Act 229 of 2023 and related definitions of Public Act 235 of 2023.	))))))	Case No. U-21567

At the November 7, 2024 meeting of the Michigan Public Service Commission in Lansing, Michigan.

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

ORDER

Background

Public Act 229 of 2023 (Act 229) and Public Act 235 of 2023 (Act 235) were signed by Governor Gretchen Whitmer on November 28, 2023. The effective date for Act 229 was February 13, 2024, while the effective date for Act 235 was February 27, 2024. Acts 229 and 235 amend the Clean and Renewable Energy and Energy Waste Reduction (EWR) Act, Public Act 295 of 2008 (Act 295). As enacted, Act 229 continues to require electric and natural gas providers to have approved EWR plans under MCL 460.1073, and additionally provides that current legislative incremental energy savings shall remain in effect until 2026. *See*, MCL 460.1077. Act 229 further amends plan requirements and the incentive structure authorized under Act 295.

On February 8, 2024, the Commission issued an order in this case (February 8 order) setting a deadline for comments and reply comments to be filed regarding Act 229. As noted in the

February 8 order, Act 229 allows for Efficient Electrification (EFEL) plans to be filed with the new EWR plans under one filing called an Energy Optimization (EO) plan. *See*, MCL 460.1071(6). The Commission specifically sought comments on the following topics relating to Act 229:

1) Regarding EFEL plans:

    a) What components should be included in the definition and calculation of efficient and high-efficient electrification measures?
    b) How will total energy consumption reduction be measured as required by Act 229?
    c) What greenhouse gas emission calculation methodologies and emission factors should be used to estimate emissions from differing electric generation sources?
    d) Should EFEL measures be added to the Michigan Energy Measures Database (MEMD)?
    e) Should the Utility System Resource Cost Test be applied to EFEL plans?
    f) Are there other considerations for EFEL program and plan implementation?

2) Section 77(6) of Act 229 states that providers may allocate savings between an electric provider and a natural gas provider for measures and programs implemented. Should there be a standard allocation developed within the EO (formerly EWR) Workgroup Collaborative to provide a uniform process for all providers to comply with?

3) Act 229 states that cold climate heat pumps (CCHP) and ground source heat pumps (GSHP) must be qualified projects. What would *qualify* CCHP and GSHP for purposes of Act 229?

4) What does MCL 460.1077(6) require regarding natural gas providers' ability to claim savings from electrification measures?

5) How should investments in workforce development be counted toward the required energy savings for the program year? Should this be done on a deemed-savings basis, similar to investments in health and safety measures?

6) What effect, if any, does Section 28(7) of Act 235 have on EWR plans for 2024 through 2025?

7) Any other issues related to implementation of Act 229 on which interested persons may wish to comment.

On July 16 and 17, 2024, DTE Electric Company (DTE Electric), Michigan Energy Innovation Business Council and Advanced Energy United (collectively, EIBC), the Natural

Resources Defense Council, Michigan Environmental Council, Sierra Club, Earthjustice, Ecology Center, Oxfam America, and the Environmental Law and Policy Center (collectively, NRDC group), Indiana Michigan Power Company (I&M), Energy Solutions, Consumers Energy Company (Consumers), SEMCO Energy Gas Company (SEMCO), Martin Kushler, Slipstream, the Geothermal Exchange Organization (GeoExchange), and the Michigan Municipal Electric Association (MMEA) filed comments. On August 9, 2024, EIBC, Consumers, and DTE Electric filed reply comments.

Comments

Question (1a): What components should be included in the definition and calculation of efficient and high-efficient electrification measures?

Consumers comments that:

> the definition and calculation of efficient and high-efficient measures should be similar in nature to the energy efficiency definitions and calculations included in the Michigan Energy Measures Database ("MEMD") for EWR. EFEL measures should be developed through a process similar to the process used to develop the MEMD for EWR. To the extent possible, the existing measure data within the MEMD should be utilized to establish EFEL measures.

Consumers' comments, pp. 1-2.

DTE Electric recommends to the Commission that a broad definition of "efficient" be above baseline technology standards while "high-efficient" should be a percentage greater than the baseline but notes that the definition "should be specific to the use case, standards, and technology being implemented to offset less efficient methods of energy usage." DTE Electric's comments, p. 3.[1]

[1] DTE Electric's comments were not paginated, therefore the Commission applies pagination in natural order beginning with the first page of comments.

In comments, Mr. Kushler and MMEA both note that Section 5 of Act 229 (Section 5) provides the definition of "efficient electrification measure" and that the definition suggests that the Legislature intended for the Commission to approve only EFEL programs which represent the best practices in high efficiency, such as "Energy Star" certification. *See*, Kushler's comments, p. 1; MMEA's comments, p. 1. EIBC also references Section 5 and Energy Star certification but adds that "[g]iven the difficulty in listing every 'efficient electrification measure,' it may be more effective for the Commission instead to set standards by which to qualify measures or judge whether a measure would qualify." EIBC's comments, p. 3. Also referencing Section 5, the NRDC group also recommends that established industry standards for efficiency should be considered by the Commission when defining efficient electrification measures. NRDC group's comments, pp. 1-3.

I&M also responds, listing several items it avers should be included such as: (1) equipment electric demand and energy consumption ratings; (2) electric utility-specific coincident peak demand consumption; (3) site-specific expected electric utility supply requirements for demand, peak coincident demand, and expected time-of-use energy consumption profile; (4) equipment-specific efficiency ratings; (5) efficient operating temperature range for air source heating, ventilation, and air conditioning equipment; (6) local climate zone history and forecast temperature range; (7) site-specific existing/replaced equipment efficiency; (8) remaining useful life of existing/replaced equipment; (9) useful life of new efficient equipment; and (10) free ridership. I&M's comments, pp. 2-3.

SEMCO comments that EFEL "plans should be determined based on the lifecycle cost-effectiveness of the measure and the net reduction in energy consumption but should also require an energy cost savings to the end use customer and a net reduction in source-to-site greenhouse

gas emissions." SEMCO's comments, p. 1.[2] SEMCO also states that given electric reliance upon fossil fuels, "[d]irect consumption of natural gas is the most efficient way to minimize losses, making it a cleaner choice than the current electric generation mix." *Id*., p. 2.

Energy Solutions recommends that the Commission utilize existing voluntary standards, including Energy Star, to define efficient and high-efficient electrification measures. Energy Solutions also contends that "there could be an opportunity to support a definition of a high-efficient electrification measure based on compressor type for residential HVAC systems." Energy Solutions' comments, p. 2.[3]

GeoExchange cites to MCL 460.1072 (Section 72) to aver that geothermal heat pumps (GHPs) should be included in the definition of high-efficiency electrification measures. GeoExchange specifically contends that, "[d]ue to their high efficiency, GHPs will reduce energy usage, greenhouse gas emissions, and utility costs in virtually all buildings and installations." GeoExchange's comments, p. 6; *see also*, *id.*, pp. 6-7.

Slipstream comments that while MCL 460.1005 lists specific measures meeting the definition, the Commission should also:

> stress the more wide-ranging aspect of efficient electrification in their definition rather than a set list of technologies that could stymie progress over time. We suggest that using products that have earned the ENERGY STAR certification is helpful for most product categories but to also keep the option open to incorporate some electrification measures that might not earn the certification if they do bring significant energy savings.

[2] SEMCO's comments were not paginated; therefore, the Commission applies pagination in natural order beginning with the first page of comments.

[3] Energy Solutions' comments were not paginated; therefore, the Commission applies pagination in natural order beginning with the first page of comments.

Slipstream's comments, p. 2.[4]

Question (1b): How will total energy consumption reduction be measured as required by Act 229?

Consumers and DTE Electric both cite to MCL 460.1072(2) to contend that the total energy consumption reduction must be determined in British thermal units (Btu), or Btu equivalencies of fossil fuels, converted to kilowatt hours (kWh). *See*, Consumers' comments, p. 2; DTE Electric's comments, p. 4. MMEA similarly cites to the statute. MMEA's comments, p. 1. Mr. Kushler, also cited Section 72 but added that:

> [f]or electricity uses where the electricity is generated upstream with fossil fuels, the calculation should be based on the MMBTU [metric million British thermal unit] of fuel consumed at the generation site. That will be necessary to accurately compare the total energy consumption impacts of various measures, as well as to estimate ghg [greenhouse gas] reduction impacts.

Kushler's comments, p. 1. Also citing the statute, GeoExchange notes that "due to their high efficiency, GHPs will typically reduce site energy consumption by approximately 70-80% over the course of a year." GeoExchange's comments, p. 7.

Similarly, the NRDC group cites the statute and states that this codified standard is the same as currently utilized in Illinois. The NRDC group also states that the MEMD could be expanded to document this but that "the Commission should allow for custom, site-specific calculations. In particular, for specialized applications of electrification measures in large commercial or industrial facilities, determinations would likely have to be made on a custom, case-by-case basis." NRDC group's comments, p. 4.

I&M states that the Commission should consider both pre- and post-baseline data information, which should include modelling of: (1) the risk of need for supplementary heat sources; (2) the applicability to premise size, layout, and usage profile; (3) the need for additional electric loads

[4] Slipstream's comments were not paginated; therefore, the Commission applies pagination in natural order beginning with the first page of comments.

such as whole house or constant air circulation fans; (4) maintenance of premise air quality and/or humidity levels; and (5) the presence of existing air conditioning and type. I&M's comments, p. 3.

SEMCO argues that:

> [t]otal energy consumption reduction should be measured by considering both direct energy consumption (on-site energy use) and secondary energy consumption (energy used in the generation, transmission, and distribution processes). This comprehensive approach ensures an accurate representation of the actual energy savings and the overall impact of the electrification measures on the energy system.

SEMCO's comments, p. 3.

Slipstream comments that, if the Commission utilizes the MEMD, "the approach for measuring reductions in total energy consumption is already determined." Slipstream's comments, p. 2.

Question (1c): What greenhouse gas emission calculation methodologies and emission factors should be used to estimate emissions from differing electric generation sources?

Consumers and DTE Electric both comment that emission impacts should be evaluated in the applicable Integrated Resource Plan (IRP) proceeding. *See*, Consumers' comments, p. 2; DTE Electric's comments, p. 5.

In comments, I&M states that "World Resources Institute (WRI) Greenhouse Gas Reporting protocols can be a reference to support emissions determinations and calculations. WRI has cross-sector tools available for refrigeration, air-conditioning, stationary combustion and transport/mobile" and "[t]he EPA's [United States Environmental Protection Agency] Clean Air Markets Program Data (CAMPD) web-based tool can be used for CO2 [carbon dioxide] emission rates." I&M's comments, pp. 3-4.

Mr. Kushler, SEMCO, and MMEA each recommend using methodologies as implemented by the EPA. *See*, Kushler's comments, p. 1; SEMCO's comments, p. 3; MMEA's comments, p. 2. More specifically, SEMCO states that "[t]he use of regional emission factors for different electric

generation sources will help to ensure accuracy and account for the broader environmental impact of increased electricity consumption." SEMCO's comments, p. 3.

Energy Solutions recommends the use of "the National Renewable Energy Lab's (NREL) Cambium emissions factors" which "are published online and can be accessed via an Excel workbook or through an interactive dashboard." Energy Solutions' comments, p. 1. Energy Solutions adds its recommendation to use "long-run marginal emissions factors for measures that result in an increase or decrease in electricity consumption, such as electrification and energy efficiency measures" and that "[t]he NREL's Cambium supports this by allowing users to generate 'levelized' emissions factors of a user-defined time period, which can be set equal to the measure lifetime." *Id*.

The NRDC group comments that estimating GHG that results from electrifying fossil fuel end uses is straightforward, also citing to the EPA standards. The NRDC group avers that "[e]stimating GHG emission increases from the electric grid is more complicated because the mix of generating sources that would serve added loads is much more variable, different from utility-to-utility and changing over time" and that "A. GHG emissions should be estimated based on long-run marginal emissions rates (not on short-run marginal or average rates); and B. GHG emissions should be estimated over the expected useful life of the electrification measure (not just on first year emissions)." NRDC group's comments, p. 4; *see also*, *id*., pp. 4-6.

Slipstream comments that GHG emissions factors should be created in reliance upon factors from established sources such as the EPA and NREL's Cambium data. *See*, Slipstream's comments, pp. 2-3.

Question (1d): Should EFEL measures be added to the MEMD?

Consumers opines that the MEMD is a good model but notes that "adding EFEL measures to the current MEMD process will create additional work to an already lengthy process. Thus, it may

be necessary to develop a separate process that results in a measure database specifically for EFEL measures." Consumers' comments, pp. 2-3. Similarly, DTE Electric states the MEMD is a good model and that standardization to the extent possible is preferred, but notes that "the EFEL measures would need to be independently developed in alignment with the model." DTE Electric's comments, p. 5.

I&M states that, in general, EFEL measures should be added to the MEMD unless "custom site-specific modeling for EFEL measures is required for compliance with any federal grant reporting requirements or any site-specific cost benefit analyses that may be required by the Commission." I&M's comments, p. 4. SEMCO notes its support for the MEMD but indicates that it has no position on whether EFEL measures should also be included. SEMCO's comments, p. 3.

MMEA also notes its support for the inclusion of EFEL measures in the MEMD. MMEA's comments, p. 2. EIBC similarly notes support for the inclusion of measures in the MEMD but contends that the Commission should "add measures that meet ENERGY STAR or other voluntary specifications to the MEMD" and that "it is important that the MEMD be updated with EFEL measures, as [Act] 229 allows for both electric providers not regulated by the Commission and gas providers to count reductions in energy consumption as a result of electrification measures toward incremental energy savings goals." EIBC's comments, p. 5. EIBC further contends that the MEMD may need to be updated to allow for calculations consistent with Act 229 and that the Commission should provide additional clarity to providers regarding measures falling outside of fuel-switching. EIBC's comments, p. 6.

The NRDC group also comments that "EFEL measures that are expected to be installed in significant quantities, and/or in applications for which custom, site-specific assessments of impacts

would be impractical or cost-prohibitive, should be added to the MEMD." NRDC group's comments, p. 6. The NRDC group states that generic algorithms should be developed "for calculating whether utility electrification investments would meet other statutory requirements regarding total site energy impacts, GHG impacts and rate impacts" and that the "impacts should be assessed over the life of the measures rather than in just the first year of installation." *Id*. In addition, the NRDC group also argues that utilities should be provided with some flexibility to deviate from MEMD, as necessary. *See*, *id*., p. 7.

GeoExchange comments that EFEL measures should be added to the MEMD as this will improve consistency and transparency of electrification measures. GeoExchange's comments, p. 7. GeoExchange also indicates that other states have began to include such measures and that the Commission may want to consider the work done by other states to update the MEMD for GHP entries. Similarly, Mr. Kushler agrees that EFEL measures should be added to the MEMD and that "the MEMD should indicate how [GHG] reduction impacts should be calculated." Kushler's comments, p. 1.

Slipstream overall notes support for adding EFEL measures to the MEMD. Slipstream states that "[i]ncluding EFEL measures in the MEMD will also help electric utilities not regulated by the Commission and natural gas utilities to assess their energy savings efforts and claim the related benefits from the changes in the law." Slipstream's comments, p. 3.

Question (1e): Should the Utility System Resource Cost Test be applied to EFEL plans?

Consumers comments that the Utility System Resource Cost Test (UCT) should not be applied as it is "neither necessary nor applicable" because the goal of an EFEL "is to increase, rather than decrease, electric energy usage" and "the potential environmental impacts and increased revenue toward fixed costs would not be captured as a benefit within the UCT." Consumers' comments, p. 3.

DTE Electric also avers that the UCT should not be applied to EFEL measures. Specifically, DTE Electric contends that the data to properly calculate a score may not be available or understood and that challenges of the application include:

> 1) capturing the dynamics of electrification between identifying and counting savings of fossil fuels 2) capturing delivered fuels (propane, fuel oil, kerosene, wood burning, & other) reductions from users that may or may not be the utility's customer 3) varying incremental costs in conversion to electrification and 4) understanding utility infrastructure upgrades required as a result of increased demand caused by electrification.

DTE Electric's comments, p. 5.

I&M states that "[t]he UCT should not be exclusively applied to EFEL plans" because it "only reflects benefits and costs from utility perspective and doesn't materially inform the effect of increasing electric rates for customers that do not participate in the program." I&M's comments, p. 4. However, SEMCO notes its support for utilizing the UCT "as a method for providing a cost-benefit analysis in the evaluation of proposed and implemented EFEL plans to ensure a utility's customers are receiving a net benefit from the plans." SEMCO's comments, p. 4.

Energy Solutions states that traditional frameworks, such as UCT, have not sufficiently accounted for costs and benefits. Energy Solutions avers that EFEL plans would provide "an opportunity to quantify additional system impacts through a cost-effectiveness framework that considers expanding benefits, including non-energy benefits (NEBs) (e.g., deferred maintenance costs, health benefits, reduced emissions, time of use benefits, etc.)." Energy Solution's comments, p. 2. Energy Solutions further states that:

> We encourage the Commission to consider what variables are most important to the state's electric and natural gas systems and weigh the costs and benefits to the appropriate systems specific to Michigan and its state-specific needs. A broader methodology or framework for accounting for the non-energy benefits of Market Transformation programs would also be highly worthwhile to ensure documented and measurable justification for these highly valuable programs.

Id., p. 3.

The NRDC states that the UCT should not be utilized as when applied to an electric utility investment the test "only includes impacts on electric system costs. Thus, it has no meaning or value when considering electrification because – by definition – there are only electric system costs and no electric system benefits." NRDC group's comments, p. 7. The NRDC group, therefore, recommends a societal cost test which includes the full range of societal benefits. *Id*.

GeoExchange notes that the UCT has benefits in demonstrating the positive system impacts of electrification measures but fails to adequately address societal benefits. Thus, GeoExchange avers that the Commission "should consider the full range of benefits, including emission reductions, health benefits through reduced combustion emissions, and energy and bill savings for participants." GeoExchange's comments, p. 7. Similarly, Slipstream notes that it does not advise using the UCT because it "does not include a social cost for carbon's effects" and instead recommends "employing a Total Resource Cost Test that includes putting a value on carbon." Slipstream's comments, p. 4.

Mr. Kushler states that the UCT should be utilized but only "with the proviso that under the definition of that test in Section 13(c), the text reading '…other associated costs…' would include the monetized value of the net reduction in greenhouse gas emissions as a benefit in the calculation." Kushler's comments, p. 2.

Question (1f): Are there other considerations for EFEL program and plan implementation?

DTE Electric quotes the MI Healthy Climate Plan in its comments to note that EFEL plans should follow the recommendation to "'establish incentives for the sale of electric appliances that yield immediate energy and cost savings, particularly for low-income Michiganders.'" DTE Electric's comments, p. 5. DTE Electric states that Michigan has the highest propane consumption in the country and that "EFEL plans would make the most impact with incentives directed towards

delivered fuel customers." *Id*. DTE Electric further recommends that engaging with a diverse group of interested persons will be vital to the implementation of Act 229 and EFEL measures. *See*, *id*., pp. 5-7.

I&M also comments that:

> The Commission should consider and account for: (i) the resource need and cost of local, site-specific analyses to best account for EFEL benefits and costs; (ii) the actual site conditions to support EFEL equipment installation and operation, including costs resulting from site readiness for code compliance, and ongoing maintenance required for ongoing efficient equipment operation; and (iii) other project funding sources, such as federal or state grants, federal or state agency funding, for attribution in utility benefit cost analyses.

I&M's comments, p. 4.

SEMCO avers that Section 72 should define health and safety because "[a]bsent such a definition would allow for EFEL plans to broadly define health and safety in an effort to circumvent the intended reduction to energy consumption and greenhouse gas emissions." SEMCO's comments, p. 4. With respect to MCL 460.1072(2), SEMCO states that the statute contains a "defined process for calculating reductions in energy consumption," but that a similar "process is not clearly defined for the reduction to greenhouse gas emissions" under MCL 460.1072(1)(b); therefore, "SEMCO recommends that such guidance be provided by Commission order and recommends that the calculation include emission[s] from the generation fuel mix." SEMCO's comments, pp. 4-5. SEMCO further notes that the statute addresses bill impacts to non-participating customers but that it does not address overall increases to customers. Specifically, SEMCO avers that "[w]ithout measures to mitigate these cost increases, the law could inadvertently place a heavier financial burden on the very residents it aims to benefit" and "shifting customers away from natural gas use and toward electric use may increase their utility bills, even if it accomplishes some reduction in overall energy use." *Id*., p. 5.

Energy Solutions comments that:

> the Commission should consider how electrification measures can be used to optimize demand response, such as direct load control of heat pump water heaters, or battery storage for electric vehicle charging to provide the most value and flexibility to the electric grid. Customer adoption of electrification is highly dependent on rates and bill impacts. The Commission should consider how time-of[-]use rates can be used to help both customers and utilities manage the financial impact of increased electric consumption from electrification.

Energy Solutions' comments, pp. 3-4. Energy Solutions also cites to the MI Healthy Climate Plan, encouraging the Commission to consider "expansive options in the EFELs to support market development initiatives, especially for low-income customers." *Id*., p. 3. Energy Solutions further notes that data collection can help answer questions and improve future programs and contends that:

> [s]ince every state has unique needs and challenges, a Michigan-specific data reporting aspect as part of EFEL planning could be a highly impactful resource for the state. Such a public reporting effort should be designed to adhere to rigorous data privacy requirements while still providing sufficient anonymized data to inform planning and demonstration of program impacts.

Id., p. 5. Finally, Energy Solutions states that the commission should consider coordinating EFEL measures with the implementation of the Home Energy Rebate (HER) programs.

GeoExchange comments that "[t]he development of EFEL plans will also provide utilities with a new mechanism to support the deployment of networked geothermal projects in support of Michigan communities. When done right, these projects can provide significant improvements in efficiency over existing fossil fuel alternatives." GeoExchange's comments, p. 8. GeoExchange further argues that the Commission and utilities should explore potential pilot projects for thermal energy networks as part of EFEL plans.

Mr. Kushler comments that the language in MCL 460.1077(4) providing that incentives directed at improving building shell insulation prior to or with the installation of a qualifying heat

pump is important "because absent that, no utility would have any incentive to improve building shell efficiency in homes installing an electric heat pump." Kushler's comments, p. 2.

Slipstream comments that Act 229 encourages EFEL which will cause electrical demand to increase while simultaneously having "the competing requirement to reduce the need to build more power plants (presumably through efficiency)." Slipstream's comments, p. 4. Slipstream avers that this conflicting language should be clarified.

Question (2): Section 77(6) of Act 229 states that providers may allocate savings between an electric provider and a natural gas provider for measures and programs implemented. Should there be a standard allocation developed within the EO (formerly EWR) Workgroup Collaborative to provide a uniform process for all providers to comply with?

Consumers comments that this issue should be more fully explored in the EO Workgroup Collaborative (EO Collaborative). More specifically, Consumers states that a "standard allocation may be overly restrictive and prevent the maximum effectiveness of co-investment in qualified electrification measures and building envelope energy efficiency." Consumers' comments, p. 3. Consumers notes, however, that a default allocation method would be appropriate when utilities are unable to agree upon the appropriate shared savings level.

DTE Electric avers that a standardized process would be helpful for utilities in the development of EWR plans. DTE Electric also contends that the allocation process "developed and adopted by the EO Workgroup Collaborative [should be] accepted by all regulators, utilities, and other stakeholders" because "agreement on these assumptions prior to plan or reconciliation filings will help streamline the regulatory process for providers, commission staff and other advocates." DTE Electric's comments, p. 7.

I&M also agrees with the development of a uniform process, albeit with differentiation "for dual fuel utilities versus single fuel . . . ." I&M's comments, p. 5. SEMCO argues that a standard allocation method "should provide guidance for voluntary collaboration between electric and

natural gas utilities," and that "[i]f a natural gas utility opts to collaborate with an electric utility in the implementation of an EFEL plan, the natural gas utility should see energy savings commensurate with the investment made on behalf of its customers and should receive cost recovery for such investments." SEMCO's comments, p. 7.

MMEA recommends "that the Commission provide guidance and lead the development of a standardized process for calculating the allocation of savings between an electric provider and a natural gas provider for measures and programs implemented." MMEA's comments, p. 3. Overall, MMEA notes its support for further evaluation of such an allocation in the EO Collaborative.

EIBC cites to Act 229 to support its recommendation for the Commission to provide utilities guidance "and/or a uniform process for compliance, as guidance may provide clarity to providers on their role in efficient electrification projects." EIBC's comments, p. 7. EIBC further notes its support for development of a uniform process through an existing workgroup to allow interested persons to provide feedback and that it recommends that any allocation "should be divided in proportion to the dollars each provider contributed to a project." *Id*.

The NRDC group contends that Act 229 provides that gas and electric utilities may "work out their own deal on how savings claims will be allocated" but contends that "there is value in developing a default allocation mechanism or formula to address situations in which it may not be possible to negotiate allocations." NRDC group's comments, p. 8. As a default, the NRDC group recommends that savings be "allocated in proportion to the level of funding each utility contributes to a program or project." *Id*. In addition, the NRDC group recommends documentation in utility plans for allocation so that utilities cannot shift savings amongst gas and electric to maximize performance incentives for shareholders.

Mr. Kushler opines that a uniform process would be beneficial "with the proviso that the two utilities involved may negotiate an alternative approach for their situation and request commission approval." Kushler's comments, p. 2. Slipstream also comments that it does not have a recommendation for the development of an allocation but that it "is important to have a standard allocation that dictates a uniform process for all providers to comply with." Slipstream's comments, p. 4.

Question (3): Act 229 states that cold climate heat pumps (CCHP) and ground source heat pumps (GSHP) must be qualified projects. What would *qualify* CCHP and GSHP for purposes of Act 229?

Consumers comments that it "recommends leveraging the CCHP and GSHP included in the MEMD." Consumers' comments, p. 4. Similarly, DTE Electric states that '[a]ll heat pumps used for space conditioning that are in the MEMD should qualify for the purposes of Act 229." DTE Electric's comments, p. 7.

I&M states that "CCHP and GSHP qualification could include equipment-specific efficiency ratings, expected climate performance capability, and expected local (site-specific) safety and health performance and contributions, including localized emissions improvement benefits." I&M's comments, p. 5. SEMCO similarly contends that "CCHP and GSHP should qualify for EFEL plans only when coupled with building envelope efficiency upgrades." SEMCO's comments, p. 6. SEMCO continues, stating CCHP and GSHP should be evaluated based on their efficiency ratings, such as "established ENERGY STAR industry standards for northern climates." *Id*. MMEA also suggests the use of Energy Star or other industry standard for determining the eligibility of CCHP and GSHP. MMEA's comments, p. 3.

EIBC notes that measures must meet the statutory definition under MCL 460.1005 and references its response to Question 1a above. Additionally, EIBC states that EFEL measures "should meet ENERGY STAR or other voluntary standards, meaning that they meet EPA energy

efficiency specifications to reduce energy usage." EIBC's comments, p. 8. Similarly, the NRDC group references its response to Question 1a. NRDC group's comments, p. 8.

GeoExchange avers that "high-quality GHP installations will meet all the legislated criteria for efficient electrification measures" and that the Commission should require specific criteria to qualify as an EFEL measure. GeoExchange's comments, p. 8.

Mr. Kushler cites to his comments under Question 1 and adds that "[a]n example of what the Commission could use for that would be requiring the equipment to meet or exceed Energy Star standards." Kushler's comments, p. 2. Slipstream also references Question 1a and states that "employing the ENERGY STAR certification for products and technologies, including cold climate heat pumps (CCHP) and ground source heat pumps (GSHP), would be the best way to ensure that they meet the efficient electrification goals of the Act." Slipstream's comments, p. 5.

Question (4): What does MCL 460.1077(6) require regarding natural gas providers' ability to claim savings from electrification measures?

In comments, Consumers states that "[n]atural gas providers can claim natural gas savings that will count toward the EWR targets and a provider's ability to achieve the performance incentive authorized under MCL 460.1075." Consumers' comments, p. 4. Further, Consumers avers that natural gas providers may work with electric providers on EFEL measures including development of an allocation of the savings between the providers.

DTE Electric also comments that natural gas providers can only claim savings as part of projects which involve qualifying EFEL measures. MCL 460.1077(6) indicates that EFEL measures "can be claimed for gas savings if they are not counted toward an electric utility's savings goals." DTE Electric's comments, p. 6.

EIBC similarly comments that "provided that the savings are not also counted toward an electric utility's savings goals, gas providers may count reductions in energy consumption as a

result of efficient electrification measures toward their natural gas savings goals" and that "[g]as providers should be able and encouraged to claim savings that electrify or partially electrify through efficient electrification measures." EIBC's comments, pp. 8-9.

The NRDC group comments that the statutory language implies that a gas utility would need to be involved in any EFEL project in order to claim any related savings and avers that "[t]his should mean that the gas utility has played a meaningful role in causing electrification investments to occur." NRDC group's comments, p. 8. Further, the NRDC group suggests that such contribution should mean at least 20% of any financial incentives. *Id*.

In his comments, Mr. Kushler contends that "[n]either regulated electric utilities nor natural gas utilities should be able to claim savings toward their EWR goals from electrification measures per se, because electrification is primarily a switch of fuel sources, not a reduction from a more efficient use of the same energy source." Kushler's comments, pp. 2-3. He also notes that the statutory language does authorize an electric utility to claim savings occurring "from incentives directed at improving building shell insulation prior to or concurrent with installation of a qualifying heat pump, regardless of original fuel type," and that "if a natural gas utility provided some or all of the incentives targeted at the building shell improvement in a natural gas heated home, they should be able to claim those savings" proportionally. *Id*.

Slipstream comments that it supports efforts to motivate natural gas providers to add EFEL measures where not already claimed by an electric utility, but that clarification may be necessary by the Commission to inform the utilities regarding eligibility. Slipstream's comments, p. 5.

Question (5): How should investments in workforce development be counted toward the required energy savings for the program year? Should this be done on a deemed-savings basis, similar to investments in health and safety measures?

Consumers responds that "deemed savings is an appropriate methodology for calculating savings to be counted toward the required savings and the performance incentive for workforce development." Consumers' comments, p. 4.

DTE Electric comments that "[w]orkforce development investment should not count toward the required energy savings for the program year, nor be counted as part of the savings in the modeling of EWR programs in the IRP" but rather "should provide deemed savings like Pilots, Education and Health and Safety program investments that will count toward the EWR financial incentive mechanism." DTE Electric's comments, p. 8.

I&M avers that a deemed-savings basis is appropriate for investments in workforce development. I&M also contends that "[t]he funding should be set up to only benefit local trade associations, local high school and regional college level educational curriculum, community-based trade schools, and industry- specific trade allies" and be "excluded from cost benefit test calculation and approval." I&M's comments, p. 6.

SEMCO states that it "supports crediting investments in workforce development toward energy savings targets on a deemed-savings basis, similar to health and safety measures." SEMCO's comments, p. 7. SEMCO further notes that such an approach would simplify tracking of workforce development investments and provides a reasonable method for recognizing their benefits.

MMEA avers that the Commission should hold a workgroup or collaborative to more fully review this question. MMEA states that Act 229 creates many new requirements but does not indicate that workforce development investments should be counted toward the required energy savings. *See*, MMEA's comments, p. 4.

EIBC notes that "[a]lthough a qualified and trained workforce is essential for market transformation and quality installations, [it] strongly recommend[s] against attributing savings to investments and workforce development, as these investments do not produce direct energy savings." EIBC's comments, p. 9. EIBC further argues that these investments could not be accurately translated into actual energy savings and that there is no basis in statute to support this practice. Thus, EIBC contends that workforce development investments should be more thoroughly examined through a workgroup, such as the EO workgroup.

The NRDC group also opposes providing deemed savings for workforce development investments because: (1) there is no statutory basis; (2) workforce development investments do not produce direct energy savings; (3) "[p]roviding deemed savings for workforce development spending will enable utilities to more easily reach higher efficiency savings performance tiers which will, in turn, allow them to earn greater shareholder incentives without actually producing what should be necessary to earn such additional incentives;" (4) deemed-savings for workforce development only rewards spending of money and not quality; and (5) other jurisdictions do not allow "utilities to claim savings towards their energy efficiency goals for spending money on workforce development." NRDC group's comments, pp. 9-10.

GeoExchange avers that "[w]orkforce availability for GHP and clean energy installations remains a critical barrier to meet Michigan's building decarbonization goals." GeoExchange's comments, p. 9. GeoExchange states that Act 229 encourages investment and that "[p]roviding incentives towards robust and effective workforce programs . . . will help ensure that the necessary workforce is available to meet the rising demand for GHP installations." *Id*. GeoExchange supports coordinating workforce development efforts across utilities to "offer in-depth training

which provides industry-relevant certifications for workers, including geothermal professional development programs for drillers, installers, and system designers." *Id*. (emphasis in original).

Slipstream also comments that a trained and qualified workforce "is essential for market transformation and quality installations lead to higher energy savings for many electrification measures." Slipstream's comments, p. 5. Slipstream also contends that the MEMD provides precedent for applying deemed-savings to workforce development investments. Like others, Slipstream suggests this issue be further explored through a workgroup or advisory group.

Question (6): What effect, if any, does Section 28(7) of Act 235 have on EWR plans for 2024 through 2025?

Consumers comments that Section 28(7) should not be applicable to EWR plans that were approved by the Commission prior to the incorporation of the 2% goal in Act 229. Consumers' comments, p. 4. Similarly, DTE Electric avers that, absent an amendment, Section 28(7) of Act 235 does not impact its approved EWR plan and I&M noted that it "does not anticipate any impact to its 2024[-]2025 EWR Plan implementation." *See*, DTE Electric's comments, p. 8; I&M's comments, p. 6.

The NRDC group avers that, given the effective date, Act 235 may be applicable to 2024-2025 plans, but that "that electric utilities must achieve annual incremental savings of greater than 2.0% in order to substitute energy waste reduction credits for renewable energy credits." NRDC group's comments, p. 10. Mr. Kushler comments that it is unlikely that any utility will achieve "in excess of 2% incremental savings during that time period," and there likely will not "be any effect of the provision described in Section 28(7)." Kushler's comments, p. 3. Similarly, MMEA states that it does not believe there are any impacts on previously approved plans. MMEA's comments, p. 4.

Question (7): Any other issues related to implementation of Act 229 on which interested persons may wish to comment.

DTE Electric adds that the Commission should provide a directive on the calculation of the financial incentive as outlined in Act 229. DTE Electric specifically notes its proposal "that providers should track EWR programs' spending for incentives used for measures that reduce space heating and for measures that do not reduce space heating," adding that "[t]he incentive spends would then be counted in to the respective two categories." *See*, DTE Electric's comments, pp. 9-10.

MMEA comments on several sections of the statute, raising several questions and requesting additional feedback from the Commission. *See*, MMEA's comments, Exhibit 1.

EIBC avers that "it is important for the Commission to recognize new potential opportunities for gas providers to claim efficient electrification savings through new EWR plans" and further encourages "the Commission to clarify that gas utilities are able and encouraged to claim savings resulting from efficient electrification measures, in a similar manner to the clarification provided by the Commission in this docket regarding electric providers' ability to claim savings through electrification measures." EIBC's comments, pp. 10-11.

The NRDC group references its recommendation regarding workforce development to aver that the Commission should "cease allowing the utilities to claim deemed savings . . . for just spending money on general efficiency education and pilot programs." NRDC group's comments, p. 10. The NRDC group further explains its recommendation and contends that utilities should only be allowed to claim savings from such programs when they actually produce real savings. *Id*., pp. 10-11.

Mr. Kushler also comments, adding that "[t]he Commission should bear in mind that there is a very fundamental difference between EWR and electrification, in terms of electric utility

motivation." Kushler's comments, p. 3. Given this distinction, he states that an EO plan "must take care to ensure that adequate requirements and utility incentives for customer energy efficiency (EWR) are sustained." *Id*., p. 4.

Slipstream encourages the Commission to consider the energy burden for low-income communities, and to be as transparent as possible about how costs to customers may be affected by the implementation of efficient electrification efforts. Slipstream's comments, p. 6.

In addition to the above, the Michigan Department of the Environment, Great Lakes and Energy (EGLE) filed a reply to the Commission's order. EGLE notes that its:

> Materials Management Division is responsible for the development of new programs using funds appropriated by the Inflation Reduction Act (IRA) including the Home Efficiency Rebate (HER) and Home Electrification and Appliance Rebate (HEAR) programs. The HER programs represent a significant opportunity to further reduce energy bills for Michiganders, offering rebates for whole-home projects that reduce residents' energy bills. HEAR offers rebates for electrification measures like heat pumps and heat pump water heaters that will reduce the green premium, and even eliminate the cost, for electrification home improvements at low-income and disadvantaged Michigander households.

EGLE's reply, p. 2. In addition, EGLE recommends that the Commission "adopt a like-for-like approach for the HER and HEAR program. Specifically, should utilities make a significant contribution to encourage efficiency measures and implementation that they be allowed to claim 100% of the energy savings towards their EWR goals for low-income households." *Id*.

Discussion

The Commission first expresses its gratitude to all those that filed comments and reply comments in response to the February 8 order. The comments filed have provided the Commission with important varying perspectives to consider going forward.

The Commission finds that the MEMD is a valuable resource for creating and vetting EWR measures. This resource is publicly available and utilized by all regulated utility providers and is

available for municipalities and cooperative electric providers who are now required to implement EWR programs for their customers. For this reason, the Commission finds that the MEMD, in conjunction with the EO Collaborative, is the most reasonable place to appropriately vet and incorporate EFEL measures and the values necessary to assist the development of EFEL plans. The Commission directs the Staff and the EO Collaborative to work through the details of the final format of an MEMD inclusive of EFEL, and to adjust the process as necessary so that the MEMD remains a database that is useful to all providers across Michigan. As the MEMD will be used by all providers, the Commission encourages non-regulated providers to share in the costs and efforts to maintain the MEMD, as had been done prior to 2021 when non-regulated providers were required to establish EWR plans and meet specific legislative requirements.

With respect to defining EFEL measures, the Commission first notes that MCL 460.1005(a) provides the following:

> "Efficient electrification measure" means an electric appliance or equipment installed in an existing building to electrify, in whole or in part, space heating, water heating, cooling, drying, cooking, industrial processes, or another building or industrial end use that would otherwise be served by combustion of fossil fuel on the premises and that meets best-practice standards for cost-effective energy efficiency as determined by the commission. Efficient electrification measure includes, but is not limited to, any of the following:
> (i) A cold-climate air-source heat pump.
> (ii) An electric clothes dryer.
> (iii) A ground-source heat pump.
> (iv) High-efficiency electric cooking equipment.
> (v) A heat pump or high-efficiency electric water heater.

In addition, the Commission finds that many commentors felt it was appropriate to rely on established and citable resources such as Energy Star, and EPA or United States Department of Energy (DOE) publicly available sources. The Energy Star program aims to set levels higher than required by federal, code, or marketplace minimums. EFEL measures within a provider's plan should have similar goals. The Commission finds that Energy Star standards should apply when

they exist for a measure. For measures that are not covered by Energy Star, the EO Collaborative should determine whether similar industry standards exist and should apply; in instances where no such similar industry standards exist, they should be developed by the EO Collaborative. The Commission further finds that utilizing nationally recognized resources such as Energy Star-endorsed measures is reasonable until an EFEL measure can be vetted and included in the MEMD, which will possess Michigan-specific values that are more accurate and appropriate for provider EFEL plans.

The Commission finds that the most reasonable determination of total energy consumption reduction should be measured as required by MCL 460.1072(2) which states:

> (2) For the purposes of subsection (1)(a), reduction of energy consumption at the customer premises shall be calculated as the amount by which A exceeds B, where:
> (a) A equals the reduction in Btu consumption of fossil fuels as a result of electrification, converted to kilowatt-hour equivalents by dividing by 3,412 Btus per kilowatt hour.
> (b) B equals the increase in kilowatt hours of electricity consumption resulting from the displacement of fossil fuel consumption as a result of electrification.

The Commission also notes there is an immaterial difference between this conversion factor and the conversion rate of 29 kWh per therm of gas saved stated in MCL 460.1077. The utility provider should utilize the most accurate conversion calculation as stated in Section 72(2) for most applications.

For purposes of estimating emissions from differing electric generation sources, providers should utilize the most reasonable resources such as EPA, NREL, and DOE, or some other publicly available source that is appropriate for the application. The Commission finds that this can be proposed by providers in EFEL, IRP, or other appropriate proceedings that provide other parties an opportunity to respond. Providers should cite the sources and calculations utilized to determine any stated emission reductions within their filing.

As noted above, Act 229 states that CCHP and GSHP must be qualified projects. The Commission finds that utility providers should utilize information available within the MEMD on these measures. The MEMD is a process to assess the level of energy savings so that a utility can make an informed decision on whether it is cost effective to offer that as a program.

With respect to the use of benefit/cost analyses, the Commission finds that EFEL plans are not subject to a legislative requirement such as the UCT like EWR plans are, but rather should comply with the stipulations found in Section 72, which states an EFEL measures plan:

> shall provide health and safety benefits to occupants of the premises or satisfy all of the following:
> (a) Reduce total energy consumption at the premises.
> (b) Reduce greenhouse gas emissions due to energy use over the life of the electrification measure.
> (c) For residential and commercial customers interconnected at secondary voltage, provide annual average energy cost savings.

MCL 460.1072(1). Section 72(3) also states that an EFEL measures plan "shall not have the effect of increasing electric rates for customers that do not participate in the program." MCL 460.1072(3). Therefore, the Commission finds that an electric provider should consider providing the results of one or more cost benefit tests, both pre- and post-plan implementation, to provide further evidence that the EFEL plan is cost effective.

As stated in MCL 460.1077(6):

> When a natural gas provider and an electric provider are both involved in a qualifying efficient electrification measures project, including a project that involves both building envelope efficiency and qualifying efficient electrification measures, the providers shall work together to reach an agreement on how savings claims will be allocated between the providers. The commission may adopt standards or default provisions for the allocation of savings claims between providers that apply if the providers are unable to reach an agreement.

Thus, the Commission finds that to make a determination of claimed savings from a project that results in both electric and natural gas savings, the providers shall work together to reach an

agreement on how savings will be allocated between providers as stated in Act 229. Additionally, if the providers are unable to reach an agreement for allocation of savings claims, the savings should be divided and allocated based on the investment in the project. It should be noted that a qualifying EFEL measure does not generate kWh savings, and therefore, savings cannot be applied to a regulated electric utility provider's EWR legislative target or goal, subject to the exception for municipal and cooperative utilities, consistent with MCL 460.1077(3). The Commission also finds any savings claimed by a natural gas provider must be the direct result of their involvement in the project and the investments in that qualifying EFEL measure or project.

The Commission further finds that a utility provider may claim savings from qualifying projects that involve multiple funding sources such as from the federal weatherization program, or funding that may result from IRA or the federal Infrastructure Investment and Jobs Act funding opportunities. Electric providers may claim all eligible kWh savings resulting from projects utilizing multiple funding sources, and natural gas providers may also claim savings resulting from projects utilizing multiple funding sources if that provider played an active role in the implementation of that project.

The Commission finds that investment in Workforce Development should not receive deemed savings. Currently, deemed savings are offered for program investment in health and safety, pilots, and education programs as a way to promote the most robust and constructive program offerings and outcomes. A provider's investment in workforce development will result in a direct benefit to the provider as the local workforce will be better equipped to implement the EWR and EFEL programs established by the provider. Levels of investment in workforce development should be established as a percentage of spend and included within a provider's EWR plan filing.

The Commission further finds that programs that award deemed savings, such as pilots, education, and health and safety, should be limited. This will help to minimize the level of savings earned by a provider which do not reduce the provider's energy sales but provide credit towards compliance. The percentages of deemed savings awarded as a percentage of the legislative requirement should be established in a plan filing with savings capped at the legislative minimum savings level. In other words, if a provider is approved to spend 5% of their program spend on pilots, this investment will generate 5% of the provider's legislatively mandated minimum savings. This would equate to 5% of the 1.5% minimum savings level for electric providers and 5% of the 0.875% minimum savings level for natural gas providers.

THEREFORE, IT IS ORDERED that the Commission Staff and the Energy Optimization Collaborative shall work through the details of the final format of the Michigan Energy Measures Database inclusive of Efficient Electrification measures, consistent with this order.

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

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, pursuant to MCL 462.26. To comply with the Michigan Rules of Court's requirement to notify the Commission of an appeal, appellants shall send required notices to both the Commission's Executive Secretary and to the Commission's Legal Counsel. Electronic notifications should be sent to the Executive Secretary at LARA-MPSC-Edockets@michigan.gov and to the Michigan Department of Attorney General - Public Service Division at sheac1@michigan.gov. In lieu of electronic submissions, paper copies of such notifications may be sent to the Executive Secretary and the Attorney General - Public Service Division at 7109 W. Saginaw Hwy., Lansing, MI 48917.

MICHIGAN PUBLIC SERVICE COMMISSION

Daniel C. Scripps, Chair

Katherine L. Peretick, Commissioner

By its action of November 7, 2024.

Lisa Felice, Executive Secretary

P R O O F O F S E R V I C E

STATE OF MICHIGAN)

Case No. U-21567

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on November 7, 2024 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 7th day of November 2024.

Angela P. Sanderson
Notary Public, Shiawassee County, Michigan
As acting in Eaton County
My Commission Expires: May 21, 2030

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