

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter, on the Commission's own motion, to)	
commence a collaborative to consider issues related)	Case No. U-20632
to utility service curtailment procedures.)	
_____)	

At the December 19, 2024 meeting of the Michigan Public Service Commission in Lansing,
Michigan.

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

ORDER

History of Proceedings

On September 11, 2019, the Commission issued an order in this case (September 11 order) establishing a collaborative to review and discuss whether curtailment procedures for natural gas should be updated to prioritize the use of natural gas for residential heating over electric generation during energy emergencies. September 11 order, p. 2. The September 11 order established the framework and focus of the collaborative and directed the Commission Staff (Staff) to file a report setting forth initial recommendations in the instant docket no later than June 30, 2020, with the Commission anticipating the review of any proposed gas utility tariff changes in future rate case filings. *Id.*, pp. 2-3.

On June 30, 2020, the Staff filed the Natural Gas Curtailment Procedures Workgroup Report (Workgroup Report) in this docket. Thereafter, the Commission invited comment on the

Workgroup Report, and comments were filed by Michigan Gas Utilities Corporation, SEMCO Energy Gas Company, Michigan Public Power Agency, Consumers Energy Company, and DTE Gas Company. On September 9, 2021, the Commission issued an order in this docket (September 9 order) summarizing the comments, adopting the recommendations included in the Workgroup Report as described in the September 9 order, and directing the Staff to file a status report on the recommendations and the activities of the Workgroup no later than September 30, 2022. On September 30, 2022, the Staff filed the Natural Gas Curtailment Procedures Workgroup Status Report (Status Report) in this docket.

The Status Report and Recommendations

In the Status Report, the Staff describes the origin of this matter and guidance from the Commission, as follows:

[S]temming from the September 11 order, the Commission opened this docket, Case No. U-20632, to direct the Staff to establish a collaborative group consisting of Staff experts, representatives from Consumers Energy Company, DTE Energy Company, and the Michigan Electric and Gas Association member utilities, and other interested stakeholders, to review and discuss whether natural gas curtailment procedures should be updated to prioritize natural gas use for residential heating over natural gas use for electric generation when appropriate during energy emergencies. In light of the increase in natural gas usage for electric generation, there is increased competition for natural gas as both a heating source and an electric generation resource. The collaborative group shall review whether natural gas curtailment procedures need to be updated to reflect current regional transmission organization (RTO) market structure, where natural gas-fueled electric generation is dispatched, and the RTO may not consider the impact on local natural gas emergencies. The collaborative group shall determine the adequacy of natural gas and electric curtailment procedures both independently and in conjunction with each other when an emergency or outage affects both energy supplies. The focus of this collaborative group should be to review and study the existing curtailment tariffs, determine if the current prioritization framework remains adequate, and develop recommendations for the Commission regarding possible updates to the tariffs.

Status Report, p. i. The Staff reports that the following organizations joined as active members of the Workgroup:

the Association of Businesses Advocating Tariff [Equity] (ABATE), Consumers Energy Company (Consumers Energy), DTE Gas Company (DTE Gas), Energy Michigan, Michigan Gas Utilities Corporation (MGUC), Presque Isle Electric & Gas Cooperative, the Retail Energy Supply [A]ssociation (RESA), SEMCO Energy Gas Company (SEMCO Energy), and Wolverine Power Supply Cooperative, Inc. (Wolverine).

Id., p. 3. The Staff states that Workgroup meetings (facilitated by members of the Gas Safety & Operations Division and the Rates & Tariffs Section of the Regulated Energy Division) were held on January 10, April 18, and August 9, 2022. *Id.*, p. 13. The Staff notes that, in the Status Report, recommended tasks are divided into those that are completed, those that are ongoing, and those that are yet to be addressed.

The Staff indicates that completed tasks include: (1) review of customer information and notice of curtailment procedures; (2) review of automated communications systems; and (3) determination of curtailment priorities. *Id.*, p. 14. The Staff reports that ongoing tasks include: (1) review of terms that are defined in tariffs; (2) review of gas-fired electric generation prioritization; (3) determination of whether a utility has a Severe Operations Manual and the review of that manual; (4) standardization of curtailment tariffs; (5) determination of whether tariff revisions are required; (6) review of actions to maintain the safe operation of large volume customers and the potential effect on tariffs, as well as the identification of large volume customers; and (7) the handling of cooperation between natural gas and electric utilities during multi-utility emergency events. *Id.*, pp. 14-18. The Staff reports that the only task that has yet to be addressed is the maintenance of a list of emergency management contacts, which is reported to be the subject of a future internal meeting among the Staff. *Id.*, pp. 18-19. Finally, the Staff presents one further recommendation to the Commission: that the Staff be directed to continue to

meet, on a regular basis, with natural gas utilities regarding the utilization of the Severe Operations Manual. *Id.*, p. 19. The Staff concludes that the Workgroup “will continue to work through the remaining recommendation tasks which have not yet been completed and, should the Commission require, additional update reports will be submitted to demonstrate the forward progress.” *Id.*, p. 20. The Commission understands that, after the filing of the Status Report, the Workgroup continued to meet quarterly for a period of time, but now meets annually.

The Commission thanks the Staff and the Workgroup participants for their engagement on these important issues regarding the best use of gas resources during times of emergency and curtailment. The Commission adopts the Workgroup’s recommendations as described in the Status Report, and directs the Staff to continue, as proposed, with all of the listed ongoing topics as well as the pursuit of an emergency contacts list and the continued meetings addressing Severe Operations Manuals. The Commission directs the Staff to provide an updated status report to the Commission, to be filed in this docket no later than July 31, 2025. Additionally, the Commission directs the Staff and the Workgroup to consider whether the issue of the handling of cooperation between natural gas and electric utilities during times of multi-utility emergencies should be addressed in a separate docket and to include a recommendation on this issue in the updated status report.

THEREFORE, IT IS ORDERED that:

A. The September 30, 2022 Natural Gas Curtailment Procedures Workgroup Status Report is accepted and the recommendations therein are adopted, as set forth in this order.

B. The Commission Staff shall file in this docket an updated status report on the recommendations and proposals adopted herein no later than July 31, 2025.

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, under 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 mpscedockets@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

Alessandra R. Carreon, Commissioner

By its action of December 19, 2024.

Lisa Felice, Executive Secretary

PROOF OF SERVICE

STATE OF MICHIGAN)

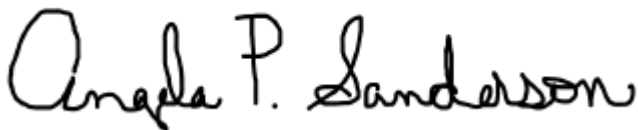
Case No. U-20632

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on December 19, 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 19th day of December 2024.



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

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