#### STATE OF MICHIGAN

#### BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter of the application of <b>DTE GAS COMPANY</b> and <b>DTE ELECTRIC</b> <b>COMPANY</b> for approval of a low-income payment stability plan program.	) ) ) Case No. U-20929 ) _)
In the matter of the application of <b>CONSUMERS ENERGY COMPANY</b> for approval of a percent of income payment plan pilot.	) ) ) Case No. U-21021 ) _)
In the matter, on the Commission's own motion, to review its response to the novel coronavirus (COVID-19) pandemic, including the statewide state of emergency, and to provide guidance and direction to energy and telecommunications providers and other stakeholders.	) ) ) Case No. U-20757 ) r) )

At the May 15, 2025 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

#### <u>ORDER</u>

In its May 8, 2020 order in Case No. U-20561 (May 8 order), the Commission directed DTE

Gas Company (DTE Gas) and DTE Electric Company (DTE Electric) (together, the companies) to

work with interested parties and the Commission Staff (Staff) to develop and propose a lowincome customer assistance pilot separate from the companies' existing low-income programs.

Consistent with the May 8 order, the companies filed an application in Case No. U-20929 on November 18, 2020, requesting approval of the companies' payment stability plan (PSP) pilot program, which was approved on April 21, 2021 (April 21 order).

According to the companies, the PSP pilot program was aimed at assisting low-income customers, i.e., those with incomes at or below 200% of the federal poverty level (FPL) and who have total arrearages with DTE Gas, DTE Electric, or both companies at or below \$1,500, and annual gas and/or electric consumption valued at less than or equal to \$3,750 in billings. April 21 order, p. 1. The pilot limited bills to 6% of the customer's gross income in the past year for single commodity customers and 10% for combination customers, creating a fixed maximum bill for participating customers based on their income, rather than providing a fixed credit amount on a variable bill like those provided by the residential income assistance or low-income assistance programs. *Id.*, pp. 1-2.

On January 29, 2025, the companies filed the DTE Energy PSP Pilot Program Report Out to MPSC<sup>1</sup> Staff (PSP Report) in Case No. U-20929, providing an overview of the PSP pilot program. According to the companies, the PSP pilot launched in 2022 is the companies' version of a percentage of income payment plan (PIPP) and concluded in 2024. PSP Report, p. 3. Additionally, the PSP Report is organized as follows:

- 1) Summary of the rate case and *ex parte* case that required PIPP program development,
- 2) Summary of the companies' current energy assistance offerings & options,
- 3) Best practices in energy affordability that informed the pilot

<sup>&</sup>lt;sup>1</sup> MPSC refers to the Michigan Public Service Commission.

- 4) Structure of the companies' PIPP,
- 5) Structure of the companies' affordable payment plan programs,
- 6) The companies' enrollment and recruitment for PIPP,
- 7) Summary of the data collection dashboard,
- 8) Data,
- 9) Customer satisfaction reports, and
- 10) Recommendations on next steps.

The Commission appreciates the work of the companies and the Staff throughout the PSP pilot program implementation process and the efforts to describe the program in the PSP Report. The Commission is dedicated to addressing affordability and the burden of energy costs for lowincome families and finds that the PIPP program results, as identified in the PSP Report, are an important outcome for gaining the understanding necessary to take the next steps. However, to gain a more robust perspective on the PIPP program's potential, the Commission finds that interested persons should be provided the opportunity to comment on the PSP Report.

The Commission also finds that interested persons should be provided an opportunity to comment on Consumers Energy Company's (Consumers') PIPP program report (May 1 Report) filed in Case No. U-21021 on May 1, 2025, which is organized similarly to the companies' PSP Report. Consumers' May 1 Report stems from the settlement agreement in Case No. U-20650 approved by the Commission on September 10, 2020. Section 19 of the settlement agreement required Consumers to work with the Staff and other interested persons to develop a PIPP pilot proposal for natural gas and combination customers. In its December 17, 2020 order in Case No. U-20697, the Commission directed Consumers to develop a PIPP pilot program for the utility's electric service.

On March 9, 2021, Consumers filed an *ex parte* application for approval of a PIPP pilot for natural gas and combination customers in Case No. U-21021. Consumers revised its application in a December 3, 2021 filing to include electric customers. The revised application included PIPP pilot details such as timeline, number of enrolled customers, means of choosing eligible customers and verifying household income, pilot structure, participation in energy waste reduction programs, de-enrollment, metrics, and financing. *See*, revised application, pp. 3-5. On February 10, 2022, the Commission issued an order in Case No. U-21021, approving the company's revised application for a PIPP pilot program for both electric and natural gas service. Following the conclusion of the two-year PIPP pilot program, Consumers filed its May 1 Report detailing the company's observations.

According to the May 1 Report, Consumers implemented and evaluated a PIPP pilot exploring additional ways to support households under 150% of the FPL, measuring several data points. May 1 Report, p. 3. Consumers provided that the primary observation was that the success metrics of the PIPP program were almost identical to the affordable payment plans (APPs), which include the Consumers Affordable Resource for Energy (CARE) program and the CARE modified budget (CARE MB) program. *Id.*, pp. 3-4. Consumers also noted that the PIPP program costs exceeded those of APPs and that, if implemented, the added PIPP costs would be particularly pronounced to low-income customers. *Id.*, p. 4. Consumers' analysis of PIPP determined that low-income customers are both successful and satisfied with the existing CARE programs, which are supported by the Michigan Energy Assistance Program (MEAP). *Id.* Considering all the cross-functional efforts to enhance MEAP and maintain a consistent customer experience, Consumers recommended continuing with the existing MEAP and the company's current APP (CARE MB),

as well as the currently offered residential income assistance and low-income assistance credits administered by the company. *Id.*; *see also*, *id.*, pp. 78-79.

Furthermore, on February 18, 2021, the Commission issued an order in Case No. U-20757 (February 18 order) that included a directive for the Staff to convene the Energy Affordability and Accessibility Collaborative (EAAC) in coordination with the Energy Waste Reduction Low-Income (EWR-LI) workgroup. The collaborators provided recommendations for long-term reform targeted toward sustainable affordability, ease of access to services, customer protections, customer safety, and opportunities for low-income households and overburdened communities to influence policy development and equity. As to the impetus for developing and evaluating PIPP pilot programs, the February 18 order also directed that the collaborators:

1. Study the alignment of income eligibility across energy assistance programs and customer protections, including studying the impacts of expanding eligibility to 200% of the FPL; and under Commission jurisdiction, align application processes if it is beneficial; and

2. Analyze the application, eligibility determination, and program design for the various assistance programs and utility-based credits, additionally making recommendations for alignment and simplification.

February 18 order, p. 17. Subsequent rate case orders for DTE Electric and Consumers also emphasize the role of the EAAC in evaluating PIPP pilot results before directing future changes, expansion, or other implementation related to PIPP programs.

Lastly, on February 10, 2022, the Commission issued an order in Case No. U-20757, which

among other things, created the Low-Income Energy Policy Board Advisory Committee,

comprising both EAAC and EWR-LI leadership. Subsequently, the Staff filed a report on March

17, 2023, in Case No. U-20757, that provided an update on the work of several subcommittees,

including the Definitions and Customer Focused Data and Metrics (CFDM) subcommittee.

On December 26, 2024, the EAAC filed its Interim Progress Report (December 26 Report) in Case No. U-20757 which, among other things, detailed thoughtful discussions on home energy security and contributing factors to energy security in the home. Evolving from these discussions is a working definition of "home energy security" that was drafted and subsequently refined. The December 26 Report included the Staff's recommendation to the Commission to adopt the definition of "home energy security" as follows:

[h]ome [e]nergy [s]ecurity is the reliable access to and availability of energy for meeting diverse and varied household needs. Home energy security is driven by several factors including but not limited to energy infrastructure, energy efficiency of housing stock, predictability and fairness of charges, and energy affordability. It can be improved through measures to address system reliability, home weatherization, energy education, consumer protection plans, and affordability strategies.

December 26 Report, p. 34.

The Commission finds that interested persons should be provided an opportunity to comment on the Staff's recommended definition of "home energy security" provided above, as the definition has implications in the assessment of PIPP pilot program results.

Any interested person may submit written comments regarding DTE Electric's and DTE Gas's PSP pilot program report (Case No. U-20929), Consumers' PIPP program report (Case No. U-21021), and/or on the definition of "home energy security" as recommended in the Staff's December 26 Report in the respective listed dockets. All comments should be paginated, reference the relevant docket, and must be received no later than 5:00 p.m. (Eastern time (ET)) on June 12, 2025. All reply comments must be received no later than 5:00 p.m. (ET) on June 26, 2025. All written comments should be mailed to: Michigan Public Service Commission, Executive Secretary, P.O. Box 30221, Lansing, MI 48909. Electronic comments should be e-mailed to LARA-MPSC-Edockets@michigan.gov. If assistance is required prior to filing,

contact the Staff at (517) 284-8090 or by e-mail at <u>LARA-MPSC-Edockets@michigan.gov</u>. All information submitted to the Commission in this matter will become public information available on the Commission's E-Dockets website, subject to disclosure, and filed in Case Nos. U-20929, U-21021, and/or U-20757.

THEREFORE, IT IS ORDERED that any interested person may submit written comments regarding DTE Electric Company's and DTE Gas Company's payment stability plan pilot program report (Case No. U-20929), Consumers Energy Company's payment stability plan pilot program report (Case No. U-21021), and/or on the definition of "home energy security" as recommended in the Commission Staff's December 26, 2024 Report in Case No. U-20757, in the respective listed dockets.

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 <u>LARA-MPSC-</u> <u>Edockets@michigan.gov</u> and to the Michigan Department of Attorney General - Public Service Division at <u>sheac1@michigan.gov</u>. 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 May 15, 2025.

Lisa Felice, Executive Secretary

# PROOF OF SERVICE

STATE OF MICHIGAN )

Case No. U-20929 et al.

County of Ingham

)

Brianna Brown being duly sworn, deposes and says that on May 15, 2025 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

Subscribed and sworn to before me this 15<sup>th</sup> day of May 2025.

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

## Service List for Case: U-20929

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