

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)	
to utility service curtailment procedures.)	Case No. U-20632
_____)	

In the matter, on the Commission’s own motion, to)	
commence a collaborative to consider issues related)	
to multi-utility emergency events.)	Case No. U-21940
_____)	

At the August 21, 2025 meeting of the Michigan Public Service Commission in Lansing, Michigan.

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

ORDER

History of Proceedings

On September 11, 2019, the Commission issued an order opening the docket in Case No. U-20632 (September 11 order) to establish 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 when appropriate during energy emergencies. September 11 order, p. 2. The September 11 order further established the framework and focus of the collaborative and ordered the Commission Staff (Staff) to file a report setting forth initial recommendations in the docket no later than June 30, 2020. *Id.*, pp. 2-3.

On June 30, 2020, the Staff filed the initial Natural Gas Curtailment Procedures Workgroup Report in the docket. The Commission subsequently invited, and received, comments on the report and issued an order in Case No. U-20632 on September 9, 2021, summarizing the comments, adopting recommendations, and directing the Staff to file a status report on the recommendations and 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 the docket.

The Commission issued a subsequent order in Case No. U-20632 on December 19, 2024 (December 19 order) summarizing the status report and directing the Staff to file an updated status report on the recommendations and proposals adopted therein no later than July 31, 2025. As part of this directive, the Commission also directed 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.” December 19 order, p. 4.

On July 30, 2025, the Staff filed the updated Natural Gas Curtailment Procedures Workgroup Status Report (updated status report) in the docket.

This order discusses the updated status report filed in Case No. U-20632 and, among other things, opens Case No. U-21940 as a result.

Updated Status Report

Following a recap of the origin of this matter, the Staff summarizes gas utility curtailment procedures, indicating that each regulated gas utility in Michigan has an approved procedure for curtailing load during a gas supply emergency and describing the fundamental objectives of these procedures. Updated status report, pp. i-ii, 3.

The Staff next describes the impetus for the updated status report, the planning process details for the workgroup, and the workgroup meetings held since the filing of the last status report and then discusses recommendation task updates—classified again as either completed recommendation tasks, ongoing recommendation tasks, or recommendation tasks yet to be addressed. *Id.*, pp. 4-6.

For completed recommendation tasks, the Staff lists the following tasks as complete and warranting no further review at this time, subject to future discussion if requested by any workgroup participant: (1) review of customer information and notice of curtailment, (2) automated communication, and (3) determining curtailment priorities. *Id.*, p. 6.

For ongoing recommendation tasks—either those preliminarily addressed and still needing additional time for completion or those that have been identified as ongoing with no finite completion date due to the scope and nature of related work—the Staff lists: (1) cooperability between natural gas and electric utilities during multi-utility emergency events, (2) gas-fired electric generation prioritization, (3) maintaining the safe operation of large volume customers, (4) terms defined in tariffs, (5) curtailment standardization, (6) maintaining a list of emergency management contacts, (7) recurring workgroup meetings, (8) severe operations manual review, and (9) tariff revisions. *Id.*, pp. 6-7. Further details of each task are described as follows.

With the task of cooperability between natural gas and electric utilities during multi-utility emergency events, the Staff states that representatives from Midcontinent Independent System Operator, Inc. (MISO) and PJM Interconnection, L.L.C. (PJM) presented at the September 22, 2023 workgroup meeting regarding the scope and impact of each organization on natural gas curtailment events, specifically natural gas curtailment events that would coincide with an electric generation emergency event. Based on this discussion and further discussion with MISO and PJM

at subsequent workgroup meetings, the Staff relays the workgroup’s belief that the scope of this particular recommendation task has become broader than intended for the current workgroup; thus, a recommendation regarding this task is discussed later in this order. *Id.*, pp. 7-8; *see also, id.*, pp. 12-13.

With the task regarding gas-fired electric generation prioritization, the Staff indicates that some utilities prioritize delivery to gas-fired electric generation in their tariffs while others do not, but notes that workgroup participants nevertheless state that, “during a curtailment event, utilities should reach out to their customers to let them know that every attempt will be made to avoid curtailment, but that the customer should prepare for a safe and effective shutdown should the curtailment criteria be reached.” *Id.*, p. 8. Because it is unclear if discussion on this task has been fully exhausted, the Staff states that the workgroup will continue to discuss this task and report back to the Commission should an additional workgroup status report be requested.

With the task of maintaining the safe operation of large volume customers, the Staff states that several utilities address maintaining the safe operation of large volume customers in their respective tariffs but notes that some workgroup participants had previously expressed the need for some baseline level of supply for large volume customers to be specifically identified in the utilities’ tariffs as it relates to ensuring plant protection. The Staff further discusses the utilities’ approaches to discussing large volume customer needs—whether by virtual town hall meetings or through one-on-one meetings—relaying unanimous agreement by workgroup participants “that the burden should [nevertheless] fall upon the large volume customers to inform their respective natural gas suppliers should their natural gas supply needs change to ensure plant protection,” with the Staff also noting that this topic is further discussed next in the terms defined in tariffs section of the updated status report. *Id.*, p. 9; *see also, id.*, pp. 9-10. Because it is unclear if discussion on

this task has been fully exhausted, the Staff states that the workgroup will continue to discuss this task and report back to the Commission should an additional workgroup status report be requested.

For terms defined in tariffs, the Staff notes that, since the filing of the 2022 status report, natural gas utilities have begun revising their respective tariffs to address prior concerns about the definitions of “Emergency Event” and “Critical Generators” in the tariffs. The Staff states, however, that workgroup discussion has since also begun regarding the possible need to clarify “Plant” and “Physical Harm to Plant Facilities” in natural gas utility tariffs. More specifically:

Regarding the current definition of Plant in tariffs, SEMCO Energy [Gas Company] has concerns that it is not clear if Plant is intended to entail only transportation customers, or if large General Service customers are also included. Furthering SEMCO Energy’s concern, if Plant is intended to include large General Service customers, those customers are not required to track daily natural gas use and likely wouldn’t have a way to do so; they would have no way to monitor their natural gas consumption to ensure they don’t exceed the plant protection levels.

Regarding the current definition of Physical Harm to Plant Facilities in tariffs, SEMCO Energy has concerns that the current language is too ambiguous, and a customer could argue that natural gas consumption that would likely be deemed excessive during a curtailment event was necessary to protect plant facilities.

Consumers Energy [Company] noted that facilities, during a curtailment event, are allowed to consume as much natural gas as necessary to keep the facility from being damaged; DTE Gas [Company] provided an example of a glass plant maintaining enough natural gas consumption to ensure that equipment isn’t damaged during a shutdown. Consumers Energy also noted that, during a curtailment event, smaller facilities consuming significantly less natural gas on average than larger consumption facilities would already be categorized in a higher priority level simply based on the consumption rate of natural gas; therefore, they may already be in a better position regarding plant safety, and may not be impacted at all or even asked to curtail natural gas usage.

Id., pp. 9-10. The Staff states that because it is difficult to get large volume customers to provide responses for updating their natural gas supply needs, because most large volume customers’ needs do not change, and because it would be reasonable for the few large volume customers whose natural gas supply needs do change to be responsible for reaching out to their respective

natural gas suppliers to make the appropriate updates, it has been, again, unanimously agreed by the workgroup participants that the burden of maintaining the safe operation of large volume customers should fall upon such customers to inform their respective natural gas suppliers should their natural gas supply needs change to ensure their own plant protections. Because it is unclear if discussion of the definitions of “Plant” and “Physical Harm to Plant Facilities” have been fully exhausted, the Staff states that the workgroup will continue to discuss these two additional terms and report back to the Commission should an additional workgroup status report be requested.

As to curtailment standardization, the Staff relays the workgroup’s belief that natural gas utility curtailment tariffs are standardized to the best extent possible at this time without being overly burdensome and, thus, the intent of the original recommendation for this task has been met. The Staff, however, notes that the workgroup will continue to discuss this topic at future workgroup meetings and determine the best approach for curtailment revisions for standardization should areas of additional need become apparent; thus, this recommendation task will have no finite end. *Id.*, p. 10.

With regard to maintaining a list of emergency management contacts, the Staff recalls discussion on this topic from the 2022 status report wherein the Staff determined that it is possible to use the Utility Emergency Contacts Directory (managed by the Commission’s Energy Security Section) as a list of emergency management contacts during natural gas curtailment events. The Staff, however, notes that, “[t]o facilitate this objective, natural gas and electric utilities would need to provide the contact information of their respective representatives who can be reached on a 24/7 basis to respond to emergency notifications” and that the utilities would need to update this information as necessary for the Staff to keep this directory up-to-date on an annual basis. *Id.*, p. 11. The Staff further states that:

[i]t has also been discussed that the natural gas utilities should maintain, and utilize, a directory of Plant Protection Services for their large volume customers during emergency events. Additionally, as discussed, natural gas utilities are required under their tariff terms to give as much notice as possible to their customers ahead of an emergency event. Natural gas utilities, typically, notify their customers of emergency events by utilizing the natural gas nomination process bulletin boards; notifications include who will be impacted, when, and steps that are required to be taken. Energy Michigan further emphasized that when notifications are posted on the natural gas utilities' bulletin boards, that information gets passed on to Energy Michigan and they, in turn, share those notifications with their customers.

Id. The Staff states, in this regard, that it will continue to work with utilities to ensure that proper emergency contacts are incorporated into the directory managed by the Staff and that the workgroup will report back to the Commission on this task should an additional workgroup status report be requested.

As to recurring workgroup meetings, the Staff relays that annual meetings have been determined by the workgroup to be the appropriate cadence for future meetings at this time, with the next workgroup meeting scheduled for October 23, 2025, and notes that future meetings will discuss outstanding recommendation tasks not yet completed, emergency curtailment events, and the continual review and updating of natural gas curtailment procedures between Michigan's natural gas utilities. *Id.*

For the severe operations manual review task, the Staff notes its review of manuals for three utilities, noting the absence of a similar manual by another utility but highlighting that the utility is in the process of developing curtailment documentation to provide guidance for curtailments consistent with its tariffs. The Staff further relays that it will continue to schedule annual meetings with natural gas utilities to review the utilities' manuals or similar documentation moving forward. *Id.*, p. 12.

As to tariff revisions, the Staff states that all natural gas utilities in Michigan are currently comfortable with their curtailment tariffs and thus do not intend to file revisions in the near future.

Given the review of recommendation tasks, including those with no finite end and the additional recommendations in this updated status report, the Staff reports that the task concerning tariff revisions will also have no finite end. *Id.*

With regard to further recommendations to the Commission and as referenced above, the Staff relays the workgroup's suggestion for the cooperability between natural gas and electric utilities during multi-utility emergency events recommendation task to be separated out from the current workgroup and, instead, established as a standalone workgroup solely focused on discussing the topic. The workgroup, in this regard, specifically proposes that participants of this newly formed workgroup include:

- Staff from pertinent Divisions within the Commission;
- Natural gas utilities;
- Electric utilities;
- Interstate Pipeline Operators; . . .
- Relevant Regional Transmission Organizations (RTOs)[, including MISO and PJM]; and
- Any additional entities which the Commission determines are essential for complete discussion.

Id., pp. 12-13.

In its conclusion, the Staff states that:

[t]he Natural Gas Curtailment Workgroup is diligently discussing, and working through, the recommendation tasks submitted in the initial workgroup report [filed in 2020]. All participants in the workgroup fully understand how vital these discussions and completion of the recommendation tasks are, and the importance of having these discussions now so that all of Michigan's natural gas utilities are properly prepared should a curtailment of natural gas become necessary due to an incident. 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. 14.

Discussion

The Commission thanks the Staff and the workgroup participants for their continued engagement on important issues concerning the best use of gas resources during times of emergency and curtailment. The Commission, in view of this, accepts the updated status report; agrees with, and therefore adopts, the recommendations therein; and finds it appropriate for the Staff to form a collaborative group for purposes of Case No. U-21940, file a report of findings and recommendations on the topic of cooperability between natural gas and electric utilities during multi-utility emergency events in Case No. U-21940 no later than 5:00 p.m. (Eastern time (ET)) on February 26, 2027, and file a subsequent status report to update the Commission on any further progress made by the Natural Gas Curtailment Workgroup in Case No. U-20632 no later than 5:00 p.m. (ET) on February 26, 2027.

THEREFORE, IT IS ORDERED that:

A. The Natural Gas Curtailment Procedures Workgroup Status Report filed in Case No. U-20632 on July 30, 2025, is accepted and the recommendations therein are adopted.

B. The Commission Staff shall form a collaborative group for purposes of Case No. U-21940 that includes the Commission Staff; Michigan natural gas and electric utilities; interstate pipeline operators; relevant regional transmission organizations, including Midcontinent Independent System Operator, Inc., and PJM Interconnection, L.L.C.; and other interested persons to review and discuss cooperability between natural gas and electric utilities during multi-utility emergency events, as described in this order. The Commission Staff shall file a report of findings and recommendations on the topic in Case No. U-21940 no later than 5:00 p.m. (Eastern time) on February 26, 2027.

C. The Commission Staff shall file a subsequent status report to update the Commission on any further progress made by the Natural Gas Curtailment Workgroup in Case No. U-20632 no later than 5:00 p.m. (Eastern time) on February 26, 2027.

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

Shaquila Myers, Commissioner

By its action of August 21, 2025.

Lisa Felice, Executive Secretary


PROOF OF SERVICE

STATE OF MICHIGAN)

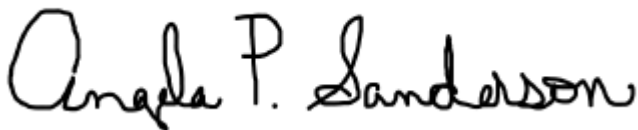
Case No. U-20632 *et al.*

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on August 21, 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 Brown

Subscribed and sworn to before me
this 21st day of August 2025.



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

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