

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 that will be used to)
collaboratively consider issues related to the)
reliability and resilience of the electric power)
system in Michigan in a Commission-sponsored)
technical conference.)
_____)

Case No. U-21388

At the December 5, 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

Background

Beginning on March 28, 2025, and lasting through March 30, 2025, northern Michigan experienced extreme winter weather that resulted in widespread power outages and had significant impacts on critical services throughout the region. Governor Gretchen Whitmer issued Executive Orders (EO) 2025-2 through 2025-5, declaring a state of emergency for numerous northern Michigan counties. On April 24, 2025, the Commission issued an order in Case No. U-21916 authorizing the release of relevant information to the Michigan State Police, Emergency Management and Homeland Security Division—the agency coordinating the state efforts in response to the emergency. As part of its continuing effort to address resilience issues, on May 21, 2025, the Commission held a public forum in Gaylord, Michigan, in order to review the response

to the catastrophic ice storm and to take input from utility customers who were affected by the storm.

The Commission has been focused on the issue of resilience for several years. On April 13, 2023, the Commission issued an order in this docket (April 13 order) acknowledging the series of storms that began on February 22, 2023, in the lower peninsula, resulting in electric power outages for approximately one million customers, collectively, of Consumers Energy Company (Consumers) and DTE Electric Company (DTE Electric) and also the loss of life.¹ The April 13 order further detailed the Commission’s wide-ranging, continuing efforts “to improve the reliability of the state’s power grid to make it more resilient against the increasingly frequent and severe storms that are associated with climate change” and announced that the Commission Staff (Staff) would convene two Commission-sponsored technical conferences to collaboratively address issues around resilience and reliability for May 22 and 26, 2023. April 13 order, pp. 2-6.

On May 22 and 26, 2023, the technical conference sessions took place virtually via Microsoft Teams, where panel discussions and recommendations were presented by the Staff, local government officials, industry leaders, national experts, consumer advocates, and other interested persons. *See*, Case No. U-21388, filings #U-21388-0004, -0005. On December 21, 2023, the Commission issued an order in this docket (December 21 order) providing a comprehensive description of the Commission’s recent efforts in regard to reliability and resilience, and providing additional directives. The Commission noted the ongoing work on the utility reliability reporting template (Case No. U-21122), the launch of the third-party utility audit (Case No. U-21305), and the launch of the Financial Incentives and Disincentives workgroup (Case No. U-21400), as well

¹ *See*, <https://www.michigan.gov/mpsc/consumer/electricity/customer-outage-history> (accessed November 16, 2025) for specific customer outage history details for 2019-present.

as the 2019 comprehensive Statewide Energy Assessment (Case No. U-20464). December 21 order, pp. 3-4. The Commission acknowledged the filing of distribution system plans (Case Nos. U-20147, U-21045, U-21097, and U-21286) and the public comment process that attends these filings. The Commission also noted the 2019 launch of the MI Power Grid initiative, which resulted in the creation of several workgroups, including workgroups on optimizing grid investments and performance, exploring opportunities to use financial mechanisms to improve reliability and resilience, and improving distribution system data access.² *See*, October 17, 2019 order in Case No. U-20645; December 21 order, pp. 4-5.

Additionally, the Commission noted its actions to expand tree trimming funding for utilities to shorten cycle lengths and boost system reliability, with required reporting, and its finding that customer interruptions on enhanced tree trim circuits have been significantly reduced. *Id.*, p. 5; *see*, May 2, 2019 order in Case No. U-20162; May 8, 2020 order in Case No. U-20561; December 17, 2020 order in Case No. U-20697; November 4, 2021 order in Case No. U-21128; December 22, 2021 order in Case No. U-20963; November 18, 2022 order in Case No. U-20836; and December 1, 2023 order in Case No. U-21297.³

Additional Commission activities during this timeframe have included storm response investigations and utility data collection efforts. *See*, Case Nos. U-20169, U-21122, U-21305, and U-21388. The Commission has also created a dedicated distribution planning section within the Commission Staff; has increased the outage credit annually and made it automatic in Case No. U-20629; and has strengthened its technical standards relating to electric utility service through the

² *See also*, <https://www.michigan.gov/mpsc/commission/workgroups/mi-power-grid> (accessed November 16, 2025).

³ *See*, e.g., Case No. U-20162, filing #U-20162-0665; and Case No. U-20697, filing #U-20697-0570.

formal rulemaking process in Case No. U-20630. Monitoring utility pursuit of federal funding for resiliency and affordability is also part of the ongoing work in Case No. U-21227. December 21 order, p. 5.

Based on information gleaned from the technical conferences and these efforts, the Commission directed additional work in the areas of: (1) communication and coordination, (2) community involvement, and (3) data accessibility and effectiveness. *Id.*, pp. 7-8. Thus, the Commission directed DTE Electric and Consumers to convene one or more meetings with a representative sample of local government officials and emergency response teams within their respective service territories not later than March 31, 2024, for the purpose of improving communication protocols between utilities and local governments during outages and extreme weather events, and to report back to the Staff on the learnings and next steps stemming from these meetings not later than April 30, 2024. December 21 order, p. 8. Noting the importance of accurate information for customers during outage events, the Commission directed DTE Electric and Consumers to file in this docket, not later July 1, 2024, a detailed description of their customer communication protocols, strategies, and timelines utilized during outage events. *Id.*, pp. 8-9. The Commission also directed DTE Electric and Consumers to develop internal processes to better use available advanced metering infrastructure (AMI) data to confirm when a customer's service is, in fact, restored and to coordinate with the Staff on ways to use AMI data for more accurate outage maps with more precise restoration times, while balancing cost considerations. DTE Electric and Consumers were directed to include a description of the initial steps taken to comply with this directive as part of the report on customer communication protocols to be filed in this docket not later than July 1, 2024. *Id.*, pp. 9-10. The Commission also invited comment on these issues. On

July 1, 2024, DTE Electric and Consumers each filed a report on customer communication protocols and AMI utilization in this docket. No comments were filed in response to the reports.

Finally, the Commission found that there is a need to better understand how utilities are identifying and prioritizing critical facility customers and to increase options and resources for identified critical facilities to address outages. *Id.*, pp. 10-11. To address this need, the Commission directed the Staff to review the Commission's service quality rules and technical standards and the resilience requirements of critical facilities in terms of their ability to operate in the event of a distribution outage, and to file a straw proposal in this docket not later than December 2, 2024, to better align the Commission's service quality rules and technical standards with the industry requirements for resilience of specific critical facilities. *Id.*, p. 11.

On December 2, 2024, the Staff filed its Straw Proposal on Critical Facility Resilience in this docket (Straw Proposal). The Straw Proposal contains the Staff's recommendations on how to improve the resilience of critical and priority facilities through rule changes, specifically to the Service Quality and Reliability Standards for Electric Distribution Systems (Service Quality rules), Mich Admin Code, R 460.701-460.752. Straw Proposal, pp. 9-24. The Straw Proposal also describes the Staff's outreach to utilities and the information acquired through that process, as well as its outreach to critical facility regulatory staff and other state agencies involved with critical and priority facilities. *Id.*, pp. 16-20. Finally, the Staff makes recommendations for further action. *Id.*, pp. 20-24.

On March 10, 2025, Michigan Municipal Association for Utility Issues (MI-MAUI) filed comments on the Straw Proposal.

On June 12, 2025, the Commission issued an order in this docket (June 12 order) inviting initial comments and reply comments on the Straw Proposal.⁴ Timely initial comments were filed by Consumers, the Association of Businesses Advocating Tariff Equity (ABATE), Indiana Michigan Power Company (I&M), and the electric members of the Michigan Electric and Gas Association (MEGA). Timely reply comments were filed by Consumers.

Comments and Discussion

As an initial matter, the Commission notes that the Staff defines a “critical facility” as “a structure or infrastructure that is essential to the health, safety, and welfare of the public and that is especially important during and after a disaster.” Straw Proposal, p. 6. The Staff provides several examples, which include hospitals, police and fire stations, nursing homes, and 911 call centers. The Staff defines a “priority facility” as “a structure or infrastructure that protects quality of life and plays an important role in community wellbeing.” Straw Proposal, p. 7. Examples include K-12 schools, military bases, long-term care facilities, and major industrial (critical process) facilities.

In the Straw Proposal, the Staff makes 13 numbered recommendations (some with subdivisions).⁵ *See*, Straw Proposal, pp. 20-24. The comments focus on the recommendations and

⁴ In the June 12 order, the Commission also directed the Staff to hold a technical conference on the issue of undergrounding and alternatives to undergrounding, and to file a report including recommendations for next steps. June 12 order, p. 8. The Commission notes that the required report was filed by the Staff in the instant docket on October 31, 2025 (filing #U-21388-0019). The Commission will address the issues associated with undergrounding in a separate order.

⁵ The Commission notes that there is no Recommendation 10; thus, while the Recommendations are numbered 1 through 14, there are actually only 13 recommendations. This order uses the numbering system used in the Straw Proposal. *See*, Straw Proposal, pp. 20-24.

are summarized below. The discussion of each recommendation is followed by the Commission's decision. The Commission approves all recommendations, with some modifications noted below.

Recommendation 1 proposes that the Staff continue to hold monthly storm calls with Consumers and DTE Electric, and that one annual call should focus on the status of efforts to update critical facility and priority facility lists and provide information on feedback from customers and state emergency management coordinators (SEMCs). Straw Proposal, p. 20. No comments were filed on Recommendation 1.

The Commission agrees with the Staff and adopts Recommendation 1. Thus, the Commission directs the Staff to continue holding monthly storm calls with Consumers and DTE Electric to discuss after-action items and feedback; and, once per year, the utility shall provide an overview of the critical facility and priority facility restoration process, information on the status of efforts to update critical and priority facility lists, and information regarding the nature of the feedback from discussions with critical facility customers and SEMCs regarding resilience. The Commission notes that related communication issues are also addressed in Recommendations 5 and 9, below.

Recommendation 2 proposes that after-action storm calls be held with I&M at the Staff's request, and that the discussion should include critical facility and priority facility customer issues. Straw Proposal, p. 20. I&M comments that it welcomes this opportunity. I&M's comments, p. 1.

The Commission agrees with the Staff and I&M and adopts Recommendation 2. The Commission directs the Staff and I&M to hold after-action storm calls upon the request of the Staff, and the discussion shall include critical facility and priority facility outage and restoration issues.

Recommendation 3 proposes that the three largest utilities (Consumers, DTE Electric, and I&M) notify the Staff prior to the arrival of a storm event if the company is expecting more than

20,000 outages. Straw Proposal, pp. 20-21. The Staff notes that notification is required per Mich Admin Code, R 460.3705(4) (Rule 705(4)),⁶ and that “major interruption” is defined in Mich Admin Code, R 460.3102(j) (Rule 102(j)) in the Technical Standards for Electric Service.⁷

I&M comments that there is no available tool that reliably predicts customer outage numbers prior to the arrival of a storm, or even storm location and severity. I&M’s comments, p. 2. I&M comments that it can inform the Staff when a storm will be significant enough to trigger the company’s incident command system. I&M also notes that 20,000 customers represent almost one-fifth of all of the customers I&M has in Michigan. *Id.*

The Commission agrees with the Staff and adopts Recommendation 3 but with a broader effect. Recognizing that this information will be based on estimates, the Commission directs all investor-owned utilities (IOUs) to provide the Staff with additional communication prior to weather events that are expected to surpass the major interruption threshold defined in Rule 102(j), including, but not limited to, the number of expected customer outages, pre-storm staging actions, and identification of the company contact(s) during the storm event and for the duration of the

⁶ Rule 705(4) provides that “[a]n electric utility or cooperative shall promptly notify the commission of any major interruption of service to its customers.”

⁷ Rule 102(j) provides as follows:

“Major interruption” means either of the following:

(i) For an electric utility or cooperative with greater than 1,000,000 customers, any weather condition that results in sustained service interruptions impacting 50,000 or more customers or an electrical system component failure that occurs under normal conditions, as defined in [Mich Admin Code,] R 460.702, impacting 7,500 or more customers unless otherwise ordered by the commission.

(ii) For an electric utility or cooperative with less than 1,000,000 customers, any weather condition that results in sustained service interruptions impacting 5% or 2,000 or more customers, whichever is greater, or an electrical system component failure that occurs under normal conditions, as defined in [Mich Admin Code,] R 460.702, impacting 3,000 or more customers unless otherwise ordered by the commission.

storm event. IOUs include Consumers; DTE Electric; I&M; Alpena Power Company; Northern States Power Company, a Wisconsin corporation; Upper Michigan Energy Resources Corporation; and Upper Peninsula Power Company. In light of the fact that Rules 705(4) and 102(j) apply to cooperatives, the Commission also encourages cooperatives, including member-regulated cooperatives (MRCs), to likewise provide the above-detailed information to the Staff.⁸

Recommendation 4 proposes that the Staff observe Consumers', DTE Electric's, and I&M's mock storm events in 2025 and 2026, and that the future cadence of these events be based on learnings from 2025-2026. Straw Proposal, pp. 21-22. I&M comments that it will continue to extend invitations to the Staff. I&M's comments, p. 2.

The Commission agrees with the Staff and adopts Recommendation 4. The Commission directs Consumers, DTE Electric, and I&M to include the Staff in the observation of mock storm or severe weather exercises for 2025-2026, and the Staff should be included in these exercises on, at a minimum, a biennial basis after 2026. The Commission also encourages all other IOUs to hold or participate in an "all hazards" exercise to prepare for large-scale outage events on a biennial basis.

Recommendation 5 proposes that Consumers and DTE Electric meet with critical facility customers on an annual basis to discuss resiliency needs and develop a communication plan to

⁸ The Commission notes that, while it does not regulate the rates of MRCs and has no jurisdiction over billing issues, the Commission retains jurisdiction over MRCs with respect to issues of safety and quality of service. MCL 460.36. The Commission observes that no MRC chose to participate in this docket which is a collaborative investigation into reliability and resilience issues. With that in mind, at this time, the Commission simply advises all cooperatives to comply with this directive. The cooperatives include Alger-Delta Co-operative Electric Association, Bayfield Electric Cooperative Inc., Cherryland Electric Cooperative, Cloverland Electric Cooperative, Great Lakes Energy Cooperative, Homeworks Tri-County Electric Cooperative, Midwest Energy & Communications, Ontonagon County Rural Electrification Association, Presque Isle Electric & Gas Co-op, Thumb Electric Cooperative, and Wolverine Power Cooperative Inc.

inform priority facility customers of their status. Straw Proposal, p. 22. The Staff encourages smaller utilities to do the same.

ABATE argues that utilities should hold annual meetings with priority facilities (as well as critical facilities) to review emergency interruption procedures and the status of the distribution system supplying that facility. ABATE's comments, p. 4.⁹

I&M comments that it is committed to engaging with its customers. I&M's comments, pp. 2-3.

MI-MAUI comments that the Commission should "order Staff to collaborate with utilities, local governments, social service providers, customers with lived experience and advocates to identify criteria and processes to identify households with vulnerable residents which should be identified as critical or priority facilities." MI-MAUI's comments, p. 6. MI-MAUI also suggests that utilities provide an "annual bill insert or on-bill invitation for customers to nominate themselves as critical/priority facilities[.]" *Id.* MI-MAUI adds that the Commission should take steps to evaluate "whether resilience services are provided equitably throughout the state" by directing the Staff to "develop content and protocols for utilities to report counts, by category, of critical facilities by county and zip code. The reports should be used to evaluate effectiveness of utility identification of and support for critical facilities and to identify geographic areas inadequately served by resilient critical facilities." *Id.* Regarding the meetings proposed in Recommendation 5, MI-MAUI comments that they are insufficient because resilience planning cannot be adequately done by utility representatives alone, and because the growing number of critical facilities means that annual meetings may not be practical.

⁹ ABATE's comment does not specify which recommendation it addresses and may also be relevant to Recommendation 7, discussed below.

MEGA states that, with respect to measuring resilience efforts, any resilience metric should be grounded in clearly established policy goals. MEGA’s comments, p. 3.

In reply to ABATE, Consumers states that it already has mechanisms in place for priority facilities to communicate with the company and recommends that utilities continue to meet with priority facility customers as requested. While arguing that the large volume of priority facilities makes this recommendation impractical, Consumers states that it “is willing to vet lists of critical and priority customers with county emergency managers or state emergency management coordinators to ensure the Company is aware of all customers who are eligible for this designation” within the bounds of data privacy issues (also discussed under Recommendation 7). Consumers’ reply comments, p. 3.

The Commission adopts Recommendation 5 with some modifications. The Commission finds that this proposal should be approved for all IOUs, but agrees with Consumers and MI-MAUI that inclusion of both categories of customers is impractical. The Commission directs all IOUs to contact critical facility customers to discuss resilience needs and reliability concerns on an annual basis, and to communicate every two years with priority facility customers as well to confirm their status and to provide instructions on outage communication procedures.

Recommendation 6 (paired with Recommendation 12b) proposes a mandate for the restoration of critical facilities within 72 hours of an outage, and recommends amending Mich Admin Code, R 460.722 (Rule 22) to include this requirement. Straw Proposal, pp. 22-23. The Staff also proposes continued communication with I&M to understand the company’s Priority 1 through Priority 5 service restoration coding system.

Consumers comments that conditions that result in a declared state of emergency should be exempted from this requirement. Consumers’ comments, p. 2.

I&M comments that it has processes in place to prioritize the restoration of critical facilities, but that it may not be possible to achieve the 72-hour deadline where there is severe damage or the area is not accessible, or where customers cannot safely accept service. I&M posits that these situations should be excluded from the 72-hour requirement. I&M's comments, p. 3.

MI-MAUI comments that the Commission should explore how best to educate customers about resilience options that are not traditionally provided by utilities, such as distributed energy resources (DERs). MI-MAUI's comments, p. 7. MI-MAUI comments that, in any case, 72 hours is far too long and that the vast majority of outages do not last 72 hours. MI-MAUI states that an arbitrary outage reporting requirement will not allow for comparison to overall reliability metrics. MI-MAUI proposes a metric of behind-the-meter (BTM) outages, as follows: "The Commission should require reporting of average, range and 90th percentile of behind-the meter outage duration for critical and priority facilities, comparable to overall CAIDI [customer average interruption duration index] with MEDs [major event days], also including the range and 90th percentile of event durations." *Id.*, p. 8.

The Commission agrees with the Staff and adopts Recommendation 6. As highlighted in the Straw Proposal, this 72-hour restoration requirement aligns with the requirement under Michigan rules that hospitals must be capable of providing a minimum of 72 hours of emergency electric service. Straw Proposal, p. 11 (citing Mich Admin Code, R 325.45301(2)). Similarly, the Federal Emergency Management Agency (FEMA) uses 72 hours as the upper end of an intermediate duration outage, with a series of recommendations for the electrical equipment needed for the functioning of critical facilities during an outage of that duration. *See*, FEMA, "Reducing 'Loss of Utility' Impacts to Critical Facilities: Recovery Advisory 2," DR-4673-FL RA 2 (August 2023), p. 8. While the Commission agrees with MI-MAUI that the vast majority of outages do not last 72

hours, the Commission sees value in aligning the Commission's restoration requirements with state and federal requirements and recommendations for critical facilities, including ensuring that the Commission's rules ultimately ensure continuity of electrical service at critical facilities during periods of extended disruption in utility service. As such, the Commission is not persuaded that declared states of emergency should be exempted from this requirement; however, acknowledging the safety and accessibility concerns that were expressed, the Commission agrees to allow extenuating circumstances to be documented and submitted for evaluation by the Staff. Thus, the Commission adopts the 72-hour restoration mandate proposal and will include this mandate in a future revision to Rule 22. In the meantime, the Commission directs all IOUs to ensure critical facilities are restored within 72 hours of an outage. If the IOU believes that it is unable to restore a critical facility within 72 hours due to an accessibility or safety concern, the utility must contact the Staff and provide photographic and/or other evidence to the LARA-PSC-outagenotification@michigan.gov mailbox indicating why restoration cannot be completed within the 72-hour timeframe and provide an estimated time of restoration. The photographic or other evidence does not waive, replace, or extend the 72-hour restoration mandate, but will be considered by the Commission in determining whether to pursue later enforcement action based on non-compliance with the restoration mandate. The Commission is not persuaded to adopt a reliability metric in addition to the restoration time mandate, and finds that MI-MAUI did not demonstrate how the metric would assist in outage restoration efforts. Finally, the Commission also directs I&M to provide the Staff, within six months of the date of this order, with detailed plans for how the company will meet the objectives of this requirement with its Priority 1 through Priority 5 service restoration coding system.

Recommendation 7 proposes that utilities hold annual meetings with city or county emergency managers and local officials to discuss restoration and reliability issues involving critical facility customers and priority facility customers. Straw Proposal, p. 22.

Consumers comments that, while the company endorses the idea of yearly meetings, these meetings should be limited to a focus on critical facility customers due to the large volume of priority facility customers; and that meetings with local officials should be held as needed, since not all communities have critical or priority infrastructure. Consumers also notes that data privacy issues will need to be addressed prior to this requirement taking effect, since the company's current tariffs prohibit Consumers from sharing the personal data of customers. Consumers' comments, p. 3. Consumers suggests a waiver or tariff revision. *Id.*

I&M states that it already conducts periodic meetings with emergency managers and indicates that it could extend the invitation to local officials. I&M's comments, p. 3.

MEGA echoes the concern about customer data privacy when sharing customer lists with local officials. MEGA's comments, p. 4.

MI-MAUI comments that resilience should be added to this discussion. MI-MAUI adds that this issue should not be reduced to simply utility restoration and reliability actions, but should include the role of local governments which must act as first responders and provide social services to the community during outage events. MI-MAUI's comments, p. 8. MI-MAUI recommends that the Commission direct the Staff "to work with utilities, local governments, advocates and other[s] . . . to identify how utilities can best provide customer information to local governments, emergency and social services during service interruptions to protect customer health and safety with due respect to customer privacy." *Id.*, p. 9.

The Commission recognizes that this is a significant effort and agrees with Consumers that the inclusion of all priority facilities is impractical. The Commission adopts Recommendation 7 with the modification that the effort be focused on critical facilities. The Commission directs IOUs to hold annual meetings with city and/or county emergency managers to discuss any restoration and reliability issues with critical facility customers located within their city or county. The Commission expects that this forum can also allow for the discussion of other issues of priority to the participating local emergency managers, including resilience issues and ensuring coordination between utility restoration efforts and local first responder responsibilities, as raised by MI-MAUI. Additionally, the Commission agrees with Consumers and MEGA and addresses the data privacy issue below.

Recommendation 8 proposes that the Commission allow the Staff an additional 12 months to engage with Tribal Governments, hold learning sessions with the owners and operators of critical facilities in those areas, and observe an additional winter storm season to gather information about restoration prioritization concerns for Tribal Governments. Straw Proposal, p. 22. No comments were filed on Recommendation 8.

The Commission agrees with the Staff and adopts Recommendation 8. In addition to approving the additional time, the Commission further directs the Staff to work with the Commission's Tribal Liaison to coordinate outreach to Tribal Governments related to critical facility and priority facility restoration concerns as described in the recommendation. The Commission recognizes that this will be an ongoing effort that extends beyond the additional 12 months.

Recommendation 9 proposes that "utilities vet lists of critical customers and potentially select priority customers with SEMCs to ensure accuracy and review critical status

designations[,]” while noting that data privacy issues may need to be addressed. Straw Proposal, p. 22. In response to Recommendation 9, I&M states that the company “believes that there is benefit to periodically meeting with state emergency management coordinators to discuss critical infrastructure at a state level.” I&M’s comments, p. 4.

The Commission agrees with the Staff and I&M and adopts Recommendation 9, again with the modification that it be focused only on critical facility customers at this time. Thus, the Commission directs IOUs to review lists of critical facilities with SEMCs to ensure their accuracy and review the critical facility designation on a biennial basis.

Recommendation 11¹⁰ proposes that “the Commission collaborate with utilities to explore current practices for working with individual households with critical care customers during sustained outages.” Straw Proposal, p. 23 (emphasis removed).

MI-MAUI comments that the Staff’s view is focused on utility resilience; whereas, for resilience planning, the unit for planning purposes should be the whole community. MI-MAUI’s comments, p. 4. MI-MAUI argues that the Commission should “enhance the resilience of critical residences via deployment of distributed energy resources including onsite energy storage with or without PV [photovoltaic solar] or other generation.” *Id.* MI-MAUI adds that “[l]ocal governments cannot discuss these households with utility planners, because they don’t know where these customers live[,]” and privacy rules also create a barrier. *Id.* MI-MAUI urges the Commission to develop a protocol that would allow utilities to share information about the status of vulnerable households during power outages.

¹⁰ There is no Recommendation 10.

The Commission agrees with the Staff and adopts Recommendation 11. The Commission directs the Staff to collaborate with IOUs to explore current practices and potential areas of improvement for identifying and prioritizing individual households with critical care customers during sustained outages.¹¹ The Commission also directs the Staff to explore the inclusion of definitions for “critical facility” and “critical care customer” in a future revision to the Service Quality rules (as discussed below regarding Recommendation 12a). Regarding MI-MAUI’s comment, the Commission addresses the data privacy issue below.

Recommendations 12a-e propose amendments to Mich Admin Code, R 460.702 (Rule 2) (definition of “critical facility”), Rule 22 (service restoration time of 72 hours), Mich Admin Code, R 460.732 (Rule 32) (new annual reporting), Mich Admin Code, R 460.744 (Rule 44) (critical facility customer restoration bill credit), and Mich Admin Code, R 460.746 (Rule 46) (critical facility customer bill credit for sustained interruptions within a 12-month period), respectively. Straw Proposal, p. 23.

In response to Recommendation 12a regarding definitions, I&M states that the definition of critical infrastructure can vary by location, and I&M argues that ongoing discussions with interested parties will be more useful than “defining absolute criteria for a critical customer.” I&M’s comments, p. 5. MEGA also comments that there should be further discussion of the definitions, because some critical care customers are on distribution lines that serve other residential and small commercial customers. MEGA’s comments, p. 3.

¹¹ The Commission recognizes that the Energy Affordability and Accessibility Collaborative (EAAC) is working on issues involving the potential shutoff of critical care customers during planned outages. That work is focused on the Commission’s rules governing billing and does not overlap with the service quality and reliability issues addressed in the instant order.

In response to Recommendation 12b regarding service restoration time, I&M again states that restoration within 72 hours may not be possible.

Recommendation 12c proposes annual reporting on the new critical facilities restoration standard and on the amount of outage credits provided to customers associated with critical facilities. Straw Proposal, p. 23. In response, Consumers repeats its comment that declared states of emergency should be exempted from the restoration standard, and adds that a “unique outage credit for critical facilities is inappropriate.” Consumers’ comments, p. 3. The company opposes the proposed annual reporting requirements and states that it will provide “the number and total dollar amount of credits for critical facilities that receive outage credits under the existing rule requirements.” *Id.*, p. 4. I&M argues that there is an increasing trend towards more extensive reporting and that “any reporting obligation should serve a clear purpose.” I&M’s comments, p. 5. I&M states that the company is open to providing relevant data while considering resource allocation and cost implications, and notes that the Commission has the statutory authority to request information at any time, as needed. *Id.*

Recommendations 12d and 12e propose amendments to Rules 44 and 46 to provide a bill credit to critical facility customers that are not restored “within a certain time period” after an outage, and a bill credit to critical facility customers that experience numerous sustained interruptions within a 12-month period. Straw Proposal, p. 23. Consumers comments that critical facilities are already eligible for a bill credit, and opines that this specialized additional credit could cause confusion and would require additional programming to the company’s billing system. Consumers’ comments, p. 4. I&M argues that these subrules are not needed because a bill credit already exists for both outages and repeated interruptions and the amounts are increased annually. I&M posits that a bill credit that is specific to critical care customers “could inadvertently lead to

prioritizing critical care customers to the detriment of other customers.” I&M’s comments, p. 5.

MEGA comments generally that providing critical facilities with separate timelines and bill credits is concerning because critical facilities are already prioritized, large credits can disproportionately affect smaller utilities, and additional reporting has costs. MEGA indicates that further discussion would be beneficial. MEGA’s comments, p. 4.

The Commission adopts Recommendations 12a, 12b, and 12c. Thus, the Commission directs the Staff to reopen the Service Quality rules for revisions to Rule 2, Rule 22, and Rule 32, to provide a definition of “critical facility” (and “critical care customer”), to provide a mandated service restoration time of 72 hours for critical facilities, and to require the proposed reporting, respectively. The Commission notes that the rulemaking process includes numerous avenues for public comment and the commenters in this proceeding may avail themselves of the opportunity to weigh in on these proposed rule changes during that process. The Commission is not persuaded to reopen Rules 44 and 46 for revision at this time in light of the fact that the rules already include bill credits which apply to all customers (including critical and priority facilities), and the rules authorize the Commission to increase the bill credits on an annual basis. While the Commission does not support the concept of a unique bill credit for critical facilities, it does support the proposed reporting which will provide useful information to the Staff. Finally, regarding the restoration mandate, the Commission directs the Staff to consider additional revisions to Rule 22 indicating that violations of the restoration mandate will trigger show cause actions and/or other corrective actions or fines. Revisions to service quality rules other than Rules 2, 22, and 32 may also be considered where needed to resolve conflicts with the revised Rules 2, 22, and 32.

Recommendation 13 proposes that utilities provide the Commission with a summary report of any major interruption which includes cumulative totals for outages, wire down incidents,

foreign crews, and other details within 14 days of restoration. Straw Proposal, pp. 23-24. The Staff notes that Rule 705(4) requires utilities to provide prompt notification to the Commission of any major interruption of service, and the Staff proposes that this summary be included in the interpretation of that regulatory requirement.

Consumers comments that it already provides prompt notification of major interruptions in “nearly real-time status updates via email.” Consumers’ comments, p. 5. Consumers states that the proposed report would be redundant. I&M comments that it can already provide storm information to the Staff during and after events via the One Voice process, and that a formal reporting requirement is not necessary for the reasons that the company has already set forth. I&M’s comments, p. 6.

The Commission agrees with the Staff and adopts Recommendation 13. The Commission directs IOUs, in complying with Rule 705(4), to provide a final summary outage report (which may be supplied via e-mail) for the “major interruption” that includes cumulative totals of outages, wire downs, foreign crews, and other relevant information within 14 days of restoration.

Recommendation 14 endorses further investigation into how to increase the deployment of single customer microgrids. Straw Proposal, p. 24.

I&M comments that it has been actively studying this issue and that a formal investigation is not necessary. I&M’s comments, p. 6.

MI-MAUI comments that this recommendation should be:

the primary focus of ongoing work, pursuing a more holistic approach to critical facility resilience planning that recognizes the community as the planning unit and identifies how to stimulate deployment of distributed resources at critical facilities that are integrated with and/or supported by utility energy systems. We specifically recommend, furthermore, that the Commission explore the merits, technical and financial aspects of front-of-meter (utility owned) distributed resources that are positioned at critical facilities and can island themselves to serve those facilities during outages, but most of the time serve as grid resources.

MI-MAUI's comments, p. 3 (emphasis in original). MI-MAUI notes that local governments are highly interested in this topic because they operate many critical facilities and, during power outages, they absorb much of the burden to identify and support critical facilities. *Id.*, p. 1. Thus, MI-MAUI argues that the Staff's perspective within the Straw Proposal is too narrow and should be broadened to include the full range of resilience topics. MI-MAUI comments that the ability to withstand disruption includes the concept of making sure that disruption does not happen in the first place. *Id.*, p. 2. MI-MAUI urges the Commission to consider "widespread islandable distributed generation or long-duration storage" and argues that "resilience planning should focus primarily on continuity of service to critical facilities and secondarily on outage identification, prioritization and restoration." *Id.* MI-MAUI opines that the Straw Proposal should focus on the deployment of DERs and the regulatory framework needed to make that happen. Relatedly, MI-MAUI contends that the Straw Proposal fails to mention numerous critical facilities such as resilience hubs and heating and cooling centers, as well as areas wherein seniors and other vulnerable customers do not live in group settings. MI-MAUI notes that, in many cases, protection for these customers must be provided by local governments, and the local government is expected to have power when other facilities do not. *Id.*, p. 3. MI-MAUI comments that local governments would be best served by DERs and asks the Commission to stimulate the deployment of DERs.

The Commission agrees with MI-MAUI and the Staff and adopts Recommendation 14, with the revision that DERs and other opportunities to improve resilience should be added to this effort. Thus, the Commission directs the Staff to conduct further investigation into identifying existing barriers and impediments that may inhibit the development and integration of microgrids, DERs,

and other beneficial technologies into the utility system to enhance the resilience of critical facilities.

Turning to more general comments, ABATE comments that the Commission should develop a process whereby an industrial priority facility can seek designation as a critical facility. ABATE's comments, p. 2. ABATE notes that the Staff included "Major Industrial (Critical Process)" as "an example under the starting point definition of a priority facility[,]" and the Staff described this as "a structure or infrastructure that protects quality of life and plays an important role in community wellbeing." *Id.*, pp. 2-3 (quoting Straw Proposal, pp. 6-7). ABATE states that:

the Department of Homeland Security's Cybersecurity & Infrastructure Security Agency ("CISA"), [explains that] "critical infrastructure sectors whose assets, systems, and networks, whether physical or virtual, are considered so vital to the United States that their incapacitation or destruction would have a debilitating effect on security, national economic security, national public health or safety" include the chemical sector and critical manufacturing sector. In terms of the critical manufacturing sector in particular, the CISA explains it is "crucial to the economic prosperity and continuity of the United States," and that a "direct attack on or disruption of certain elements of the manufacturing industry could disrupt essential functions at the national level and across multiple critical infrastructure sectors." The "core of this sector" includes industries such as primary metals manufacturing, machinery manufacturing, electrical equipment, appliance, and component manufacturing, and transportation equipment manufacturing.

Id., p. 3 (notes omitted). Thus, ABATE argues, Major Industrial (Critical Process) facilities should be eligible to be considered critical facilities rather than priority facilities.

In reply to ABATE, Consumers comments that it uses a Design Failure Mode and Effects Analysis (DFMEA) to identify critical and priority facilities and customers, and argues that allowing "a large set of commercial or industrial customers to be designated as 'critical customers' would dilute the priority they are given" and could have a negative effect on the truly critical facilities impactful to public health. Consumers' reply comments, p. 2. Consumers contends that introducing new criteria could undermine the DFMEA.

The Commission agrees with Consumers and is not persuaded to adopt this proposal. ABATE has not explained why areas such as industrial parks, for example, need to be supplied with the option to upgrade to critical facility status. The Commission finds that such a process could weaken the efforts approved in this order aimed at strengthening the resilience of critical facilities and priority facilities and improving restoration activities.

Finally, turning to the issue of data privacy raised in response to Recommendation 7, the Commission agrees with several of the commenters that additional analysis of this issue is required. In both emergency and non-emergency outage situations, state efforts are often coordinated by the Michigan State Police – Emergency Management and Homeland Security Division (MSP/EMHSD). MSP/EMHSD teams also validate damage assessments for purposes of making state and federal recovery programs available. During outages, such information is also useful to the State of Michigan Emergency Operations Center (SEOC) for purposes of conducting welfare checks on vulnerable customers. In these situations, the utilities have the most accurate information regarding customer data, including: (1) customer name, (2) customer address, and (3) customer contact information, such as telephone numbers and e-mail addresses. Such customer data is protected under each utility’s data privacy tariff provisions and must not be released without a customer’s consent, except under limited circumstances. The Commission’s Consumer Standards and Billing Practices for Electric and Natural Gas Service, Mich Admin Code, R 460.101 *et seq.* (billing rules) govern the issue of customer data privacy. Specifically, Mich Admin Code, R 460.153(2)(e) (Rule 53(2)(e)) provides that each utility’s privacy tariff shall “[s]pecify that customer information may be disclosed without consent in response to a warrant or court order, as required for collection activities, or as necessary for primary purposes.” “Primary purpose” is defined as “the collection, use, or disclosure of information that a utility collects or a

customer supplies when an authorized business need exists or as an emergency response requires in order to . . . [p]rovide for system, grid, or operational needs . . . [or] [p]rovide services as state or federal law requires or as the utility’s approved tariff specifically authorizes.” Mich Admin Code, R 460.102a(t)(ii) and (iii) (Rule 102a(t)(ii) and (iii)). Additionally, Mich Admin Code, R 460.101a(3) authorizes the Commission to, on its own motion, temporarily waive any requirements of the billing rules.

In the April 24, 2025 order in Case No. U-21916, the Commission approved the release of customer name, address, and contact information to the MSP/EMHSD without customer consent by utilities affected by the 2025 northern Michigan ice storms based on the language of Rule 53 and the fact that the circumstances fell under the definition of “primary purpose” in Rule 102a(t), thus finding that the situation did not require a waiver. The Commission finds that the same interpretation is appropriate in the instant case. The Commission authorizes the IOUs to release certain customer data privacy information to the MSP/EMHSD and the SEOC without customer consent, that is limited to: (1) customer name, (2) customer address, and (3) contact information, i.e. telephone numbers and e-mail addresses,¹² during and after major interruptions (as defined in Rule 102(j)) for customer health and safety purposes or for federal disaster reimbursement. This release of information fits within the definition of “primary purpose” codified in Rules 53 and 102a(t). Likewise, should the issue arise, this release of information will not be considered a violation of the relevant utility’s data privacy tariff. The Commission encourages the cooperatives

¹² The Commission notes that, under Michigan’s Freedom of Information Act (FOIA), personally identifiable information (PII) such as name, address, and telephone number is exempt from disclosure as a public record. MCL 15.243(1)(a), (d); *Michigan Federation of Teachers & School Related Personnel, AFT, AFL-CIO v Univ of Michigan*, 481 Mich 657, 660; 753 NW2d 28 (2008). Thus, if the information provided by the utilities became the subject of a FOIA request filed with MSP or SEOC, the customer data privacy information should be redacted from the responsive documents by those agencies pursuant to the exemptions included in FOIA.

to provide this limited customer information to the MSP/EMHSD and SEOC as well, during and after major interruption events.

THEREFORE, IT IS ORDERED that:

A. The Commission approves the recommendations contained in the Commission Staff's December 2, 2024 Straw Proposal on Critical Facility Resilience as modified in this order.

B. Within six months of the date of this order, Indiana Michigan Power Company shall provide the Commission Staff with detailed plans for how the company will meet the objectives of Recommendation 6 (the service restoration mandate) with its Priority 1 through Priority 5 service restoration coding system.

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 December 5, 2025.

Lisa Felice, Executive Secretary

PROOF OF SERVICE

STATE OF MICHIGAN)

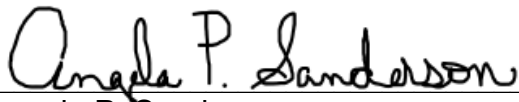
Case No. U-21388

County of Ingham)

Brianna Brown being duly sworn, deposes and says that December 5, 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 5th day of December 2025.



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

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