

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 ) Case No. U-21388  
system in Michigan in a Commission-sponsored )  
technical conference. )  
\_\_\_\_\_ )

At the January 12, 2026 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**

On April 13, 2023, the Commission opened this docket (April 13 order) in the wake of a 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.<sup>1</sup> The April 13 order 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

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<sup>1</sup> See, <https://www.michigan.gov/mpsc/consumer/electricity/customer-outage-history> (accessed January 12, 2026) for specific customer outage history details for 2019-present.

around resilience and reliability for May 22 and 26, 2023. April 13 order, pp. 2-6. Subsequent orders in this docket have further detailed the Commission's ongoing efforts to examine and improve the reliability and resilience of Michigan's electric power system. *See*, April 13 order, pp. 2-6; December 21, 2023 order in Case No. U-21388, pp. 2-11; June 12, 2025 order in Case No. U-21388 (June 12 order), pp. 1-6; and December 5, 2025 order in Case No. U-21388, pp. 1-5.

In the June 12 order, the Commission recounted the results of a public forum held in Gaylord, Michigan, on May 21, 2025, where the Commissioners and the Staff heard directly from utility customers who experienced the March 2025 northern Michigan ice storm and the response to it by utilities, local and state authorities, and others. During the public forum held in Gaylord, moving the overhead electric distribution wires underground emerged as a key theme proposed by those present for improving electric distribution system performance during catastrophic storms. The Commission noted that the Staff investigated expanding underground electric distribution facilities previously in Case No. U-15279 and issued a report in that docket dated November 21, 2007, with findings indicating that the benefits of undergrounding did not compare favorably to the costs. However, the Commission concluded that, since 2007, the instances of extreme weather have increased, and the costs, benefits, and performance of utility infrastructure have also changed. Michigan utilities have also conducted undergrounding pilots and the Staff has continued to examine undergrounding data. June 12 order, pp. 7-8. Thus, in the June 12 order, the Commission directed the Staff to conduct a technical workshop for discussing the costs and benefits of undergrounding and alternatives to undergrounding for reliability and resilience improvement, and to include the latest learnings from existing undergrounding pilots, no later than September 30, 2025. *Id.* The Staff was further directed to provide a report to the

Commission with recommended next steps for the Commission's consideration, to be filed in this docket no later than October 31, 2025. *Id.*

The technical workshop took place on September 17 and 19, 2025. On October 31, 2025, the Staff filed the Electric Undergrounding Report (Report) in the instant docket. The Report includes a description of the history of electric undergrounding<sup>2</sup> in Michigan and details the presentations, takeaways, and Staff recommendations from the two-day technical workshop. Report, pp. 1-24.

In the Executive Summary, the Staff states that:

[s]tudies suggest targeted, well-selected undergrounding programs present strong economic cases and cost-effective solutions to improve reliability and resilience of the electric system. Given the unique risks to Michigan and utility service territories, it is critical to gather data, utilize modern tools, work collaboratively to explore cost sharing opportunities, and analyze results to develop strategies that confirm where undergrounding offers cost-effective solutions to improve the performance of the electric system.

Report, p. i. The Staff concludes the Report with the following recommendations:

- 1) Staff recommends the Commission direct utilities to identify Michigan-specific risks and provide detail in future DSPs [distribution system plans] about how the Michigan-specific risks were evaluated in weather modeling, forecasting tools, and used to inform future planning efforts.
- 2) Staff recommends the Commission consider acquiring, no sooner than 2027, annual reliability data (SAIDI [system average interruption duration index], SAIFI [system average interruption frequency index], and CAIDI [customer average interruption duration index]) from utilities through the MPSC Docket [Case] No. U-21122 reporting template broken down by both weather type (blue sky, gray sky, and catastrophic) and circuit. Utilities should utilize this data to support system improvement investment decisions. Staff and utilities should work to update the template if the Commission directs this additional reporting to allow utilities to report annual data.

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<sup>2</sup> Rules addressing undergrounding are located at Mich Admin Code, R 460.511-460.519. Previous reports and orders that have addressed undergrounding include the November 21, 2007 report filed in Case No. U-15279; the August 25, 2021 order in Case No. U-21122, pp. 8-9; the September 8, 2022 order in Case No. U-20147, pp. 73-74; the July 10, 2025 order in Case No. U-20147, Exhibit A, Section IV(h)(v); the June 12, 2025 order in Case No. U-21305 (DTE Electric), pp. 34-35; and the June 12, 2025 order in Case No. U-21305 (Consumers), p. 27.

3) Staff recommends the Commission direct utilities to either complete pilot projects that align with the orders in MPSC Docket [Case] No. U-20147 and MPSC Docket [Case] No. U-21305 using the objective criteria for pilots in MPSC Docket [Case] No. U-20645 or conduct a comprehensive analysis to evaluate whether an undergrounding program is a cost-effective solution to improve performance of the electric distribution system. The primary objectives of these efforts must be aimed to determine if an undergrounding program is a cost-effective solution to improve electric distribution system performance, and if so, to develop an undergrounding strategy. Utility pilot and analysis findings, lessons learned (good and bad), and undergrounding strategy should be presented in future DSP filings and rate cases (where cost recovery is requested) and leverage economies of scale.

4) Staff recommends the Commission direct utilities to explore the potential of cable rejuvenation practices as a way to extend the life of existing underground cables and present their findings and long-term strategy in a future DSP filing.

5) Staff recommends the Commission direct utilities to develop and implement criteria in the next DSP filing designed to explore and take advantage (if appropriate) of undergrounding opportunities that exist during system conversion and other major infrastructure upgrade projects.

6) Staff recommends that transmission owners in Michigan continue to consider and evaluate the benefits of undergrounding infrastructure when a transmission line creates significant environmental and social impacts. Transmission owners should consider the appropriateness of undergrounding transmission within both PA [Public Act] 30 of 1995 applications and for existing lines when significant maintenance or rebuilds are necessary.

7) Staff recommends the Commission issue guidance that requires utilities to appropriately consider reliability impacts when analyzing proposed or potential projects or conducting BCAs [benefit cost analyses]. As the ICE [interruption cost estimate] Calculator 2.0 is, by default, the industry standard for quantifying the economic impacts of reliability events, the Commission should strongly encourage results of the calculator be at least one way reliability benefits are calculated for consideration in these analyses. Other methods may be considered but must be properly supported if used.

8) Consistent with the BCA for DERs [distributed energy resources] effort underway as part of MPSC Docket [Case] No. U-20898 and Staff's recommendation #7, Staff recommends that reliability should be considered in undergrounding BCA[s]. Staff recommends the Commission direct utilities to apply all cost tests (SCT [societal cost test], UCT[utility cost test], TRC [total resource cost test], participant cost test, etc.) to non-DER investments and offer transparency into their models through planning and outreach efforts that involve interested parties.

9) Staff recommends the Commission direct utilities to identify and apply Michigan-specific risks associated with the uniqueness of the service territory for BCA and alternatives analyses. This approach will allow the utility to better understand mitigation solutions.

10) Staff recommends the Commission direct utilities, as part of their future DSP pre-filing outreach or other outreach efforts, to solicit coordination and cost-sharing opportunities that may improve coordination and, ultimately, reduce the costs of undergrounding projects.

11) Staff recommends the Commission consider acquiring data from utilities relevant to the SIRI [sustained interruption reduction index] and REPAIR [restoration effectiveness plus area index resilience] metrics. This recommendation is based on the assumption that these metrics will be adopted by IEEE [Institute of Electrical and Electronics Engineers].

Report, pp. 25-26.<sup>3</sup>

The Commission expresses its appreciation for the Staff's work in developing the Report and finds that there should be an opportunity for interested persons to comment on the Report. Thus, any interested person may file initial comments on the Report no later than 5:00 p.m. (Eastern time (ET)) on February 27, 2026. Reply comments may be filed no later than 5:00 p.m. (ET) on March 27, 2026. Written and electronic comments must be paginated and must reference Case No. U-21388. Written comments should be mailed to: Executive Secretary, Michigan Public Service Commission, P.O. Box 30221, Lansing, MI 48909. Comments submitted in electronic format may be filed via the Commission's E-Docket website, or for those persons without an E-dockets account, via e-mail to [LARA-MPSC-Edockets@michigan.gov](mailto:LARA-MPSC-Edockets@michigan.gov). Any person requiring assistance prior to filing may contact the Staff at (517) 284-8090 or by e-mail at [LARA-MPSC-Edockets@michigan.gov](mailto:LARA-MPSC-Edockets@michigan.gov). All comments submitted to the Commission in this matter will be filed

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<sup>3</sup> The Staff explains that the term "utilities" in the recommendations refers to rate-regulated utilities in Michigan. Report, p. 25, n. 22. The Staff encourages electric "cooperatives and municipally owned electric utilities to also consider these recommendations." *Id.*

in Case No. U-21388 and will become public information available on the Commission's website and subject to disclosure.

THEREFORE, IT IS ORDERED that any interested person may file initial comments on the Electric Undergrounding Report no later than 5:00 p.m. (Eastern time) on February 27, 2026. Reply comments may be filed no later than 5:00 p.m. (Eastern time) on March 27, 2026.

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

MICHIGAN PUBLIC SERVICE COMMISSION

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Daniel C. Scripps, Chair

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Katherine L. Peretick, Commissioner

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Shaquila Myers, Commissioner

By its action of January 15, 2026.

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Lisa Felice, Executive Secretary

# PROOF OF SERVICE

STATE OF MICHIGAN )

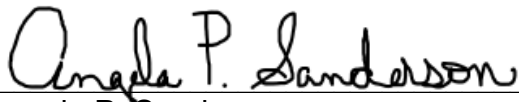
Case No. U-21388

County of Ingham )

Brianna Brown being duly sworn, deposes and says that on January 15, 2026 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 15<sup>th</sup> day of January 2026.



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

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