In the matter of the application of Consumers Energy Company for approval of a gas cost recovery plan, five-year forecast and authorization of gas cost recovery factors for the 12-month period ending March 31, 2015.

In the matter, on the Commission’s own motion, to consider revision of Consumers Energy Company’s gas customer choice and end use transportation programs and tariffs.

At the July 23, 2015 meeting of the Michigan Public Service Commission in Lansing, Michigan.

PRESENT: Hon. John D. Quackenbush, Chairman
Hon. Greg R. White, Commissioner
Hon. Sally A. Talberg, Commissioner

ORDER GRANTING REHEARING

Procedural History

On December 27, 2013, Consumers Energy Company (Consumers) filed an application pursuant to Section 6h of 1982 PA 304 (Act 304), MCL 460.6h, requesting approval of its gas cost recovery (GCR) plan and factors for the 12-month period ending March 31, 2015. On June 3, 2015, the Commission issued an order approving Consumers’ GCR plan and factors for the 12-month period ended March 31, 2015, with modifications set forth in its order, and further accepting the company’s five-year forecast (June 3 order). Among the various modifications set
forth in the order was the Commission’s directive that Consumers should consider, under its current gas customer choice (GCC) tariff, appropriate daily delivery obligation (DDO) determinations in order to ensure that GCR customers do not incur costs of additional supply purchases going forward. June 3 order, pp. 10-11. The Commission also instructed Consumers to address, in its next gas rate case, any GCC tariff changes needed to remedy this issue. Id.

Regarding Consumers’ administration of its end use transportation (EUT) program, the Commission instructed the company to evaluate its options under the existing EUT tariff to remedy the inequity that results from GCR customers shouldering a disproportionate share of the incremental purchased gas costs caused by colder than normal (CTN) weather. Id., pp. 13-14.

On June 9, 2015, Consumers submitted a petition for rehearing to the Commission, and, on June 30, 2015, the Commission received the Commission Staff’s (Staff), the Michigan Department of Attorney General’s (Attorney General), and the Residential Ratepayer Consortium’s (RRC) responses in opposition to the company’s petition for rehearing.

Rule 437 of the Commission’s Rules of Practice and Procedure, Mich Admin Code, R 792.10437, provides that an application for rehearing may be based on claims of error, newly discovered evidence, facts or circumstances arising after the hearing, or unintended consequences resulting from compliance with the order. An application for rehearing is not merely another opportunity for a party to argue a position or to express disagreement with the Commission’s decision. Unless a party can show the decision to be incorrect or improper because of errors, newly discovered evidence, or unintended consequences of the decision, the Commission will not grant a rehearing.
As discussed below, the Commission finds that Consumers met its burden of demonstrating legitimate grounds for granting rehearing. Thus, for the reasons set forth in this order, the Commission grants the rehearing request.

Positions of the Parties

Consumers argues, in part, that the Commission’s June 3 order would require significant and unprecedented changes to well-established gas delivery tariffs and programs. Specifically, the company argued that the June 3 order represents a change in direction from the Commission’s previous approval of its GCC program, in which DDOs were determined with the purpose of balancing loads on an annual basis and requiring suppliers to deliver $1/365^{th}$ of their annual loads each day. The company explained that its GCC tariff permits Consumers to determine GCC DDOs on a monthly basis with the goal of minimizing the imbalance between customer load and supplier delivery in each GCC pool at the end of the GCC year. Consumers explains that the program is designed to balance between GCC customer load and supplier delivery on an annual basis and is reconciled annually at the end of the GCC year for any imbalances. The company points out that the GCC program tariff does not contemplate daily or monthly balancing of GCC supply loads, but is instead designed to achieve an annual balancing. Consumers further argues that there is nothing in the current program tariff that permits the company to consider GCC or EUT storage inventory levels when calculating monthly GCC DDOs. The company argues that its process of determining GCC suppliers’ monthly DDOs based on pro-rata estimates of their annual loads has been in place since it initiated a voluntary pilot of the GCC program in late 1997. Consumers further argues that, the Commission, in approving its GCC program, clearly understood that GCC suppliers’ daily delivery schedules were to be determined based on the goal of balancing those loads on an annual basis and requiring suppliers to deliver approximately
1/365\textsuperscript{th} of their annual loads each day. The company asserts that this goal did not contemplate or provide for adjustments to the GCC DDO requirements to protect GCR customers from gas cost increases. According to Consumers, the directive in the June 3 order to change the administration of the GCC DDO requirement to ensure that GCR customers do not incur costs of additional supply purchases going forward represents a departure and a significant change from the design of the established GCC program. Thus, the company asserts that compliance with the June 3 order will require a significant and transformative change to the entire GCC program tariff.

Consumers similarly argued that the June 3 order’s directive to require the company to administer its EUT tariffs so as to administer transportation customers’ use of storage and delivery requirements in a manner that protects GCR customers from cost increases will also require a change to an established choice gas delivery program. The company explains that transportation customers and their suppliers do not currently have daily delivery requirements and the company does not currently require daily metering for transportation customers. Consumers’ petition, p. 7. Consumers argues that if the transportation program is changed to require daily balancing, then daily metering would also be required at substantial cost.

Consumers also explained the differences between its GCC program and its EUT program with respect to DDO requirements. It noted that the EUT program is designed so that transportation customers contract with Consumers for both an annual contract quantity (ACQ) and a maximum daily quantity (MDQ) of gas to be delivered to Consumers’ system for the customer. \textit{Id.} It further explained that the current transportation tariff allows EUT customers to contract for a specified authorized tolerance level (ATL) giving the customers the ability to use storage, which is balanced on a monthly basis. The EUT tariffs provide EUT customers the flexibility to have their supplies nominated to Consumers’ system a day ahead of their delivery to the system by third-
party gas suppliers. Accordingly, the company argues that it does not know EUT customers’ supplies with certainty until approximately a day ahead of when the gas is nominated and scheduled for delivery to Consumers’ system. The company further explains that its EUT tariffs do not give it the authority to require daily deliveries or balancing, and that, if an EUT customer exceeds its authorized monthly withdrawals, as defined in the tariff, the unauthorized gas usage charge would apply. Consumers maintains that it is not authorized to either require EUT customers to increase daily deliveries or to limit EUT customers’ ability to withdraw gas from storage pursuant to their existing contracts in order to minimize GCR purchases. As with the changes to the GCC program tariff, the company maintains that changing its EUT tariffs to comply with the June 3 order’s instruction to administer the program in a way that minimizes GCR gas costs would require a “significant and transformative change” to the transportation program. Id., p. 8.

The company further argues that the June 3 order’s instructions are a deviation from the Commission’s standard procedure for considering GCC program tariff issues. Specifically, Consumers argues that, in past cases, such issues were resolved in cases specifically designed to address the GCC program and its implementation, or in general gas rate cases where various tariff issues are regularly raised, considered, and decided. In those circumstances, parties interested in participating in the litigation or consideration of the GCC program tariff received appropriate notice of the opportunity to participate. Here, Consumers points out that no party petitioned to intervene in this proceeding to represent the interests of GCC or EUT customers or suppliers. And, the company further notes that those customers will be substantially affected by the June 3 order in this GCR plan proceeding. It therefore asks the Commission to clarify the order’s recommendations to assure GCC and EUT customers that they may rely on the company’s
currently effective tariffs until they are modified in a future commission proceeding designed for this purpose.

Consumers further argues that the Commission’s instructions in the June 3 order should not be used to penalize the company for administering its GCC and EUT programs in accordance with its Commission-approved tariffs. The company explains that when it agreed to implement a voluntary GCC program as a result of a collaborative proceeding in Case No. U-12550, it received assurance that neither Consumers, nor other Michigan local distribution companies (LDCs), would suffer GCR disallowances as a result of complying with the terms of the GCC program tariff.

Consumers further notes that issues involving its administration of its GCC program are currently being litigated in Case No. U-17133-R, which is the company’s 2013-2014 GCR reconciliation proceeding. Specifically at issue in that case is a proposed $4,464,099 disallowance based on the Staff’s testimony that the company should have, but failed to, minimize increased gas costs for GCR customers when determining GCC suppliers’ DDO requirements. Thus, in addition to its other arguments, Consumers argues that the directive in the June 3 order may have the unintended consequence of leaving a perception that the Commission has prejudged the 2013-2014 GCR reconciliation proceeding by making a determination regarding the company’s administration of its GCC and EUT program tariffs during the winter of 2013-2014. It points out that when the Commission decided the 2014-2015 GCR plan case that led to the June 3 order, it did not have the benefit of detailed evidence presented on those issues that was presented in Case No. U-17133-R. Thus, Consumers asks the Commission to grant rehearing in order to clarify that the June 3 order was not intended to prejudge the issues currently being litigated in Case No. U-17133-R.
Consumers also takes issue with the Commission’s conclusion in its June 3 order that the Administrative Law Judge’s (ALJ) finding that GCR customers have had to pay a disproportionate share of the costs of purchased gas during CTN and design day weather was not disputed. According to Consumers, the company’s rebuttal evidence, brief, reply brief, and exceptions explained that the RRC’s proposal that GCC DDOs and EUT supplier delivery requirements be made proportionate to the levels of GCR increased gas purchases during CTN weather was not possible under the currently existing GCC and EUT tariffs. It further contends that the Commission’s findings on the GCC and EUT issues in this plan proceeding are “premature” and that they “lack the benefit of an appropriate record made by all parties with interests in the GCC and EUT programs.” Consumers’ petition for rehearing, p. 12.

Consumers argues that the June 3 order’s directive results in substantial uncertainty and risk for its administration of the GCC and EUT programs this upcoming winter. It points out that the next gas rate case will not be decided before the winter of 2015-2016, and that it is facing arguments about the disallowance of GCR costs based on its administration of the GCC program tariff governing that program. It argues that it is left in “an unfairly precarious and uncertain position” for the upcoming winter, in part because, the June 3 order provided no guidance as to how the company should modify its administration of the GCC and EUT programs other than a general and “somewhat vague” directive that those programs should be administered so as to ensure that GCR customers are protected from cost increases. Id., p. 13. Consumers claims that if it adheres to its current GCC and EUT program tariffs it could potentially face claims for disallowed GCR costs like those it is currently facing in Case No. U-17133-R. Conversely, the company argues that its other option is to operate outside of its existing GCC and EUT tariffs in an attempt to unilaterally modify its administration of those programs to satisfy the Commission’s
expressed instruction to protect GCR customers from cost increases. Consumers argues that, while neither option is satisfactory, the latter option would be unlawful as the company is required to comply with its Commission-approved tariffs. Thus, Consumers seeks a rehearing to remedy the unacceptable result, and unintended and unlawful consequence of subjecting the company to claims of GCR disallowances as a result of its adherence to its existing GCC and EUT tariffs.

The company further claims that the Commission’s directive in the June 3 order that Consumers should use its next gas rate case to propose changes to its GCC and EUT tariffs has the unintended consequence of forcing Consumers to propose changes to its tariffs before it has had a chance to appropriately research and design potential modifications to the GCC and EUT programs. The company maintains that compliance with the June 3 order’s instructions would necessarily involve a significant change to its GCC and EUT programs and tariffs and that Consumers requires more time to do the research and redevelop the programs than the timeline in the next gas rate case affords. Rather than lump this project in with the next general gas rate case, the company prefers that a separate proceeding be initiated expressly for the purpose of addressing the needed changes. Consumers points out that, when the GCC program was created, a separate collaborative proceeding was created for this express purpose and interested parties had an opportunity to provide input into the terms and conditions of the GCC program. Thus, Consumers argues that the Commission’s desire to change these programs can best be accomplished by a proceeding specifically designed for such a purpose rather than during a general rate case.

Consumers also argues that the instructions in the June 3 order are outside the scope of a statutorily authorized Act 304 proceeding because such a proceeding does not include issues relating to the implementation of GCC program tariffs. It again points out that this case was not noticed to consider proposed changes to the goals of the GCC and EUT programs. Consumers
contends that this argument supports its assertion that the Commission should grant rehearing in this proceeding and adopt the company’s proposal to initiate a proceeding specifically designed to consider proposals to amend the GCC and EUT programs to achieve the goal of minimizing cost increases to GCR customers.

Finally, the company reasserts that the GCC program has been in existence since 1997, has remained relatively unchanged since 2000, and is a complex program that the company has lawfully administered in accordance with its GCC program tariff. Consumers contends that, consistent with the assurance provided in Case No. U-12550, it has not suffered a GCR disallowance or rejection of a GCR plan as a result of its implementation of the GCR program prior to the winter of 2013-2014. The company further claims that the June 3 order alters a core assurance provided to Consumers and other Michigan utilities when they agreed to provide a voluntary GCC program, and further that this assurance has formed a “key foundation for the successful administration of the GCC Program for approximately 15 years.” Consumers’ petition for rehearing, p. 16.

The Attorney General, the RRC, and the Staff responded to Consumers’ petition for rehearing. The Attorney General argues that the Commission’s June 3 order properly addressed all of the issues pertaining to the company’s GCC and EUT programs in this proceeding, that the order was well-reasoned and supported by the whole record, and further that the company has the ability to comply with the order, which does not cause any unintended consequences. The Attorney General explains that issues relating to gas supply and the company’s plan for managing its gas supply were properly addressed in an Act 304 proceeding. He points out that the order states that if the company concludes tariff changes are required, those changes need to be addressed in Consumers’ next general rate case instead of an Act 304 proceeding, and further concludes that the
Commission properly exercised its authority in making this determination. In addition, the Attorney General asserts that Consumers’ argument that the Commission wrongly addressed terms and conditions of GCC tariffs is not grounds for rehearing.

Regarding Consumers’ argument that it cannot take steps to consider the effects of CTN weather on GCR customers without revising its tariffs, the Attorney General suggests the assertion is “baseless.” Attorney General’s response, p. 3. Specifically, he points out that the company has done just this when it took affirmative steps to plan for CTN weather in the wake of the polar vortices. The Attorney General observes that Consumers added ten percent to winter months in calculating the estimated annual supply quantity for alternative gas suppliers (AGS). According to the Attorney General, this action demonstrates that the company has already begun to consider the Commission’s goals in administering its GCC program tariff. The Attorney General further asserts that Consumers can make improvements within the terms of its existing tariffs, such as increasing the daily delivery amounts when CTN weather is forecasted or when GCC storage inventories are well below planned levels. Thus, the Attorney General argues that Consumers is fully capable of considering the impact of administering its GCC program on GCR customers during CTN weather without tariff changes and without causing unintended consequences.

Regarding the company’s argument that it should not be penalized for administering its GCC and EUT programs pursuant to its Commission-approved tariffs, the Attorney General argues that nowhere in the Commission’s order does the Commission suggest a penalty be imposed on Consumers in future proceedings. He further points out that, even were the Commission to order disallowances based on a determination that Consumers failed to reasonably and prudently make decisions in administering its programs, this is not a penalty but rather the Commission’s exercise of its expressly granted statutory role.
The Attorney General argues that the June 3 order demonstrates a deliberate yet measured approach that appropriately requires Consumers to consider the effects of CTN weather on GCR customers in administering its GCC and EUT programs. He notes that this measured approach merely directed the company to consider and study the issue before filing its next general rate case with an eye toward revising tariffs if needed. The Attorney General further argues that the mere fact that the company anticipates filing a general rate case in the near future does not alone serve as an adequate basis for granting Consumers’ petition for rehearing. He asserts that the company is well-positioned to consider these issues before filing its next general rate case, but further suggests that if the Commission determines further clarification would help to flesh out the issues in this case, then the Attorney General would not oppose giving the utility more time to look at the issue. Nevertheless, the Attorney General believes that the Commission should not grant rehearing on the basis of the utility company’s request for a separate proceeding on this issue, and further recommends that the Commission not put off these issues indefinitely. Accordingly, the Attorney General opposes granting the petition for rehearing.

The Staff disagrees with Consumers’ position that it cannot consider the disparate impact of CTN weather on GCR customers without revising its tariffs. In support of its argument on this point, the Staff points out that Consumers has already taken steps to plan for CTN weather, specifically by increasing by ten percent the estimated annual supply quantity for AGSs during winter months. The Staff cites this action as an example of how Consumers has already begun to take into account the Commission’s goals in administering its GCC program tariff. The Staff further asserts that, within the confines of Consumers’ existing GCC and EUT program tariffs, the company is able to increase daily delivery amounts when CTN weather is forecasted or when GCC storage inventories are well below planned levels. The Staff argues that, as the Commission in its
June 3 order merely required Consumers to consider the impact on GCR customers of CTN weather in administering its GCC programs without tariff changes, there are no unintended consequences, no uncertainty for the company, and further that reconsideration is unnecessary.

The Staff further disagrees with Consumers’ argument that the Commission’s June 3 order would have the unintended consequence of penalizing the company for administering its programs pursuant to their Commission-approved tariffs. The Staff does not view potential disallowances to be a penalty. Instead, the Staff points out that the logical correlation of the assurance provided in Case No. U-12550 that if LDCs make reasonable and prudent decisions in their GCR cases and follow customer choice program rules, a disallowance would be inappropriate, is that, if utility actions are not reasonable and prudent, disallowances would be appropriate. The Staff further points out that, in that same paragraph that the company cites in the Staff report, is the sentence which indicates the Commission cannot predict or prejudge issues that may arise in GCR cases, and that the Commission should be receptive to considering applications filed to address any problems that adversely impact the LDC or its sales customers. Staff’s response, p. 3, quoting the Staff’s September 22, 2000 report in Case No. U-12550. The Staff further contends that, because the Commission has not ordered any penalty against Consumers or altered any “core assurances” of the GCC program, reconsideration on this ground is inappropriate. Id.

The Staff further argues that, if Consumers determines tariff changes are needed to effectuate the Commission’s instructions in its June 3 order, the Staff believes the company could adequately study the relevant issue before filing its next general gas rate case. However, the Staff also asserts that, given Consumers’ statement that it needs additional time to study the issue, the Staff would not oppose the Commission’s clarification of its order to permit Consumers to address tariff changes either in (1) its next general rate case, or (2) in a separate contested case proceeding.
Finally, the Staff argues that the Commission did not exceed its authority when it chose to consider Consumers’ management of its gas supply in an Act 304 proceeding. The Staff suggests that the Commission’s June 3 order addressed issues relating to gas supply and the company’s plan for managing its gas supply, which is precisely the reason the Commission ordered Consumers to address any necessary tariff changes in its next general rate case as opposed to any future Act 304 proceeding. Thus, the Staff argues that reconsideration on this ground is not appropriate.

The RRC disagrees with Consumers’ argument in its petition that the Commission should, in this plan proceeding, consider the appropriateness of potential disallowances at issue in Case No. U-17133-R, when the company’s testimony and initial brief have already been filed. Rather, the RRC asserts that any penalty consequences in Case No. U-17133-R should be decided on the basis of the evidence in that case. The RRC further argues that the applicable GCC program tariff sections do not require a rate case proceeding, and suggests it is time for the Commission to respond to requests for equitable GCR treatment in CTN weather. The RRC also recommends that tariff changes for the GCC program should be made any time before November 2015 so that they are effective for service rendered on and after November 1, 2015. The RRC disagrees that GCC suppliers would experience uncertainty except for that uncertainty related to extreme CTN weather like that experienced during the winter of 2013-2014. The RRC further points out that the same uncertainty exists regarding supply requirements for service to GCR customers and the company’s planning for overall supply requirements and point-in-time storage capabilities.

Regarding the company’s proposed changes to the EUT program tariff, the RRC recommends that those changes should be made available to all intervenors and EUT customers/suppliers within three months and implemented in the next gas rate case. The RRC further points out that in this case, it recommended Consumers establish a monthly DDO for end users at approximately 90% of
average daily supply for normal level, arguing that this level of supply would protect against 10% warmer than normal (WTN) weather, and EUT customers would still retain the authorized tolerance level (allocated storage amount) and monthly balancing for CTN weather. The RRC argues that this does not create any uncertainty for third-party suppliers preparing for the next winter period. The RRC further points out that the mere fact that Consumers’ EUT program has operated successfully for 26 years does not mean that it should continue unchanged in the future. In support of this argument, the RRC points out that there were inherent deficiencies in the company’s planning for the winter of 2013-2014. The RRC points out that, since 1988, no other year has revealed the implicit deficiency of not having minimum daily supply requirements for EUT customers.

Discussion

Having considered the arguments for and against granting rehearing in this proceeding, the Commission concludes that rehearing should be granted for the limited purpose of creating a separate docket and proceeding in order to enable Consumers and all interested parties to participate with adequate opportunity to evaluate any necessary changes to the company’s EUT and GCC programs and relevant tariffs in order to protect GCR customers from inequitable gas supply costs during CTN weather. The Commission finds that Consumers met its burden of establishing that granting rehearing is necessary to avoid the unintended consequence of a denial of due process to those AGSs who may wish to participate in a proceeding addressing these issues.

The provision in the Administrative Procedures Act of 1969, MCL 24.271, governing the requisite notice of hearing in a contested case requires that parties be given reasonable notice of the hearing which shall include a short and plain statement of the matters asserted. Further, the United States and Michigan Constitutions prohibit the taking of property without due process of
law. The Due Process Clause of the Michigan Constitution states: “No person shall be ... deprived of life, liberty or property, without due process of law.” Const. 1963, art. 1, § 17. The corresponding provision of the United States Constitution is applicable to Michigan through the Fourteenth Amendment, and provides in part, “nor shall any person ... be deprived of life, liberty, or property, without due process of law.” U.S. Const., Am. V. Further, as the Michigan Supreme Court recognized in Sidun v Wayne Co Treasurer, 481 Mich 503, 509; 751 NW2d 453 (2008) (note omitted):

Proceedings that seek to take property from its owner must comport with due process. A fundamental requirement of due process in such proceedings is “notice reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections.” Mullane v. Central Hanover Bank & Trust Co., 339 U.S. 306, 314, 70 S.Ct. 652, 94 L.Ed. 865 (1950).

In the instant matter, interested parties who might have sought intervention and the opportunity to present evidence in this case had they known that Consumers’ GCC and EUT programs were going to be scrutinized with an eye toward remedying the inequity that has resulted from GCR customers paying a disproportionate share of gas costs during CTN weather were not informed that this was a matter to be considered in this case. Thus, to the extent that those left out of the proceeding could become responsible for shouldering a greater portion of gas costs during CTN weather as a result of the Commission’s June 3 order, they should not be deprived of proper notice and an opportunity to be heard on the issue.

Although the Commission does not conclude that an Act 304 proceeding is an inappropriate forum to consider the company’s gas supply plan and the management of its gas supply, the Commission is concerned that AGSs may not have received adequate notice of the issues addressed in the June 3 order. The Commission further concludes that the administrative burden of proceeding with a separate docket to address the GCR gas cost equity issues identified in the
June 3 order is outweighed by the Commission’s responsibility to afford all interested parties due process of law.

Accordingly, the Commission grants rehearing for the purpose of scheduling a separate proceeding on its own motion in Case No. U-17900 to address the inequity of GCR gas costs during CTN weather and Consumers’ EUT and GCC programs and related tariffs. All parties to Case No. U-17334 shall be considered parties in Case No. U-17900 without the necessity of filing an intervention. The Commission further instructs all parties in Case No. U-17334 to file proposals supported by proposed pre-filed testimony and exhibits in Case No. U-17900 addressing the GCR gas cost issues identified in the Commission’s June 3 order within 90 days of the date of this order. The Executive Secretary shall include in the docket for Case No. U-17900 the service list for all licensed AGSs, who shall be served a copy of this order. Further, any party filing a proposal and accompanying testimony and exhibits in Case No. U-17900 shall serve the proposals, testimony, and exhibits on all other parties and the AGSs identified in the service list in that docket. The Commission further directs that petitions to intervene by any new persons desiring to participate in Case No. U-17900 shall be filed no later than November 10, 2015. Further, a prehearing conference shall take place in Case No. U-17900 on November 17, 2015, before Administrative Law Judge Sharon L. Feldman.

THEREFORE, IT IS ORDERED that the petition for rehearing filed by Consumers Energy Company is granted and the parties to Case No. U-17334 are directed to file their proposals, pre-filed testimony, and exhibits in the new docket for Case No. U-17900 within 90 days of the date of this order.

The Commission reserves jurisdiction and may issue further orders as necessary.
Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, under MCL 462.26. To comply with the Michigan Rules of Court’s requirement to notify the Commission of an appeal, appellants shall send required notices to both the Commission’s Executive Secretary and to the Commission’s Legal Counsel. Electronic notifications should be sent to the Executive Secretary at mpscedockets@michigan.gov and to the Michigan Department of the Attorney General – Public Service Division at pungp1@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

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John D. Quackenbush, Chairman

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Greg R. White, Commissioner

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Sally A. Talberg, Commissioner

By its action of July 23, 2015.

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Mary Jo Kunkle, Executive Secretary