

**STATE OF MICHIGAN**

**BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

In the matter, on the Commission’s own motion, )  
to open a docket for certain regulated electric )  
utilities to file transportation electrification plans )  
and for other related matters. )  
\_\_\_\_\_ )

Case No. U-21538

**COMMENTS OF THE**

**MICHIGAN ENERGY INNOVATION BUSINESS COUNCIL**

**AND**

**ADVANCED ENERGY UNITED**

**Introduction**

In the Michigan Public Service Commission’s (“Commission”) December 1, 2023 Order in Case No. U-21297 (“December 1 Order), the Commission recognized the additional planning required to prepare for increased transportation electrification across DTE Electric’s service territory and “found that meaningful discussion of the development of the [transportation electrification plan] (“TEP”) and [electric vehicle] (“EV”)-related investments would be best conducted in a forum other than a rate case, due to the size, complexity, and deadline-driven nature of rate cases.”<sup>1</sup> To that end, the Commission opened the instant docket for the receipt of DTE Electric’s (“DTE” or the “Company”) TEP and ordered the Company to file a TEP in this docket by January 11, 2024. Concurrently, following technical conferences on electric vehicle (“EV”) issues held in January

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<sup>1</sup> Michigan Public Service Commission, Case No. U-21538, “Order opening docket in the matter, on the Commission’s own motion, to open a docket for certain regulated electric utilities to file transportation electrification plans and for other related matters,” December 21, 2023, pp. 1-2, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/0688y00000BD1w7AAD>.

2024, on March 15, 2024, the Commission issued an Order in Case No. U-21492, which reviewed learnings from the technical conferences and directed Staff to develop minimum filing requirements for utility TEPs.<sup>2</sup> On July 2, 2024, the Staff filed proposed TEP Filing Requirements in this docket.<sup>3</sup> Following a stakeholder comment and reply period, on January 23, 2025, the Commission approved TEP filing requirements.<sup>4</sup> The final filing requirements state that “on July 1, 2025, and at least every two years thereafter unless otherwise ordered by the Commission, an electric utility must file a TEP with the Commission in Case No. U-21538”<sup>5</sup> and allows interested persons 45 business days to submit initial comments and 30 days to submit reply comments evaluating a TEP.<sup>6</sup>

In accordance with the Commission’s Order in Case No. U-21538, on April 22, 2026, DTE Electric filed its 2027-2031 TEP in the instant docket.<sup>7</sup> The Michigan Energy Innovation Business Council (“Michigan EIBC”)<sup>8</sup> and Advanced Energy United (“United”; collectively “Michigan

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<sup>2</sup> Michigan Public Service Commission, Case No. U-21492, “Order in the matter, on the Commission’s own motion, to open a docket that will be used to collaboratively consider and address issues and concerns related to use and deployment of electric vehicles in a Commission-sponsored technical conference,” March 15, 2024, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/0688y00000CW7TZAA1>.

<sup>3</sup> Michigan Public Service Commission Staff, Case No. U-21492, “Michigan Transportation Electrification Plan Filing Requirements,” July 2, 2024, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/0688y00000EP4nWAAT>.

<sup>4</sup> Michigan Public Service Commission, Case No. U-21492, “Order in the matter, on the Commission’s own motion, to open a docket that will be used to collaboratively consider and address issues and concerns related to use and deployment of electric vehicles in a Commission-sponsored technical conference,” January 23, 2025, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00000X2NGsAAN>.

<sup>5</sup> *Id.*, p. 2.

<sup>6</sup> *Id.*, p. 5.

<sup>7</sup> DTE Electric Company, “2027-2031 Transportation Electrification Plan,” April 22, 2026, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

<sup>8</sup> The Michigan Energy Innovation Business Council is a trade organization tasked with growing Michigan’s advanced energy economy by fostering opportunities for innovation and business growth and offering a unified voice in creating a business-friendly environment for the advanced energy industry in Michigan.

EIBC/United”)<sup>9</sup> and their member companies have been engaged in EV policy issues for many years including through public convenings, research and report writing, Commission workshops (including the January 2024 technical conferences), and contested cases. Michigan EIBC/United appreciate the opportunity to provide comments in response to the Company’s 2027-2031 TEP.

## **General Comments**

### *Stakeholder Engagement Process*

As noted above, Section 2 of the final filing requirement indicates that “by 5:00 p.m. (Eastern time) on July 1, 2025, and at least every two years thereafter unless otherwise ordered by the Commission, an electric utility must file a TEP with the Commission in Case No. U-21538.”<sup>10</sup> Section 8(a) and (b) of the TEP filing requirements allows interested persons 45 business days to submit initial comments and 30 days to submit reply comments evaluating a TEP.<sup>11</sup> While the amount of time allotted for the stakeholder comment period is reasonable to Michigan EIBC/United, the temporal proximity of the TEP filings and the utility rate cases, in which cost recovery for TEP programs is decided, makes it nearly impossible for any stakeholder comments to be adequately incorporated into the TEP and utility rate case filings. This is partly a result of the proximity of the current timeline for rate case filings (which can be filed as frequently as every 12 months) and partly a result of the remaining fact that cost recovery for TEP programs is determined in a rate case.

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<sup>9</sup> Advanced Energy United is a national business association representing leading companies in the advanced energy industry. United supports a broad portfolio of technologies, products, and services that enhance U.S. competitiveness and economic growth through an efficient, high-performing energy system that is clean, secure, and affordable.

<sup>10</sup> Michigan Public Service Commission Staff, Case No. U-21492, “Michigan Transportation Electrification Plan Filing Requirements,” January 24, 2025, p. 2, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00000XDvn6AAD>.

<sup>11</sup> *Id.*, p. 2.

For example, in 2024, Consumers Energy filed its TEP in Case No. U-21538 on June 25, 2024.<sup>12</sup> Prior to this filing, Consumers Energy filed for approval of the programs and proposals included in the TEP in its general rate case (Case No. U-21585) on May 31, 2024.<sup>13</sup> Petitions to intervene in that general rate case were due on June 20, 2024. Hypothetically, changes could have been made to the TEP in response to comments in the Case No. U-21538 docket after June 25, 2024. However, without specific direction from a Commission Order, it is highly unlikely that the Company would have elected to make changes to programs for which they were already seeking cost recovery in an active rate case. As such, any stakeholder comments filed after that date would have effectively served no practical purpose and resulted in no change to the funding, and therefore execution, of the programs.

In 2025, DTE Energy did not file a TEP progress report in Case No. U-21538, but requested recovery for minor program adjustments in its 2025 general electric rate case, Case No. U-21860, which was filed on April 24, 2025.<sup>14</sup> As far as Michigan EIBC/United are aware, these minor revisions were not discussed with external stakeholders prior to their presentation in the rate case, making it impossible for stakeholders to provide feedback on the proposed recommendations, much less see those recommendations incorporated into the rate case filing. That same year, Consumers Energy filed its TEP annual progress report on June 27, 2025 in Case No. U-21538.<sup>15</sup>

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<sup>12</sup> Consumers Energy, Case No. U-21538, “Transportation Electrification Plan 2024,” June 2024, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/0688y00000EFQgtAAH>.

<sup>13</sup> Direct Testimony of Jeffrey A. Myrom on behalf of Consumers Energy, Case No. U-21585, May 31, 2024, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/0688y00000Dn0uNAAR>.

<sup>14</sup> Direct Testimony of Neal T. Foley on behalf of DTE Electric Company, Case No. U-21860, April 24, 2025, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00000InIwAAI>.

<sup>15</sup> Consumers Energy, Case No. U-21538, “Transportation Electrification Plan: Annual Progress Report 2025,” June 2025, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00000wdxWAAQ>.

Prior to this filing, Consumers Energy filed for approval of the programs and proposals included in the TEP in its general electric rate case (Case No. U-21870) on June 2, 2025.<sup>16</sup> Petitions to intervene in that general rate case were due on June 25, 2025. Given this timeline, there was again no opportunity to provide feedback that could be expected to be incorporated into the TEP.

Finally, in 2026, DTE Energy filed its TEP in Case No. U-21538 on April 22,<sup>17</sup> and filed for approval of the programs included in the TEP in its general electric rate case (Case No. U-22046) four business days later on April 28, 2026.<sup>18</sup> Similarly, Consumers Energy filed its TEP in Case No. U-21538 on June 1, 2026,<sup>19</sup> and filed for approval of the programs included in the TEP in its general electric rate case (Case No. U-22070) the following business day on June 2, 2026.<sup>20</sup> While both utilities held stakeholder engagement workshops prior to filing their TEPs and rate cases in 2026, it is unclear from both filings what feedback was incorporated and if or how these workshops helped reshape the utilities' TEP strategy.

Presumably, as it relates to the official 45-business day comment period open to stakeholders in Case No. U-21538, TEP comments would be most useful to inform any needed changes to the TEP *prior* to a utility requesting approval for its transportation electrification programs in the *subsequent* relevant rate case. However, as shown in the above examples, since 2024, the utility

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<sup>16</sup> Direct Testimony of Jeffrey A. Myrom on behalf of Consumers Energy, Case No. U-21585, June 2, 2024, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00000s6UQyAAM>.

<sup>17</sup> DTE Electric Company, Case No. U-21538, "2027-2031 Transportation Electrification Plan," April 2026, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

<sup>18</sup> Direct Testimony of Milena Kabashi on behalf of DTE Electric Company, Case No. U-22046, April 28, 2026, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001xwP3ZAAU>.

<sup>19</sup> Consumers Energy, Case No. U-21538, "Transportation Electrification Plan & Annual Report 2026," June 2026, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs000024ndTGAAy>.

<sup>20</sup> Direct Testimony of Alex Gast on behalf of Consumers Energy Company, Case No. 22070, June 2, 2024, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs0000258C3KAAU>.

TEPs were either filed within less than a week of or, in the case of Consumers Energy, directly after the rate case in which the utility was seeking approval for related programs. In either instance, there is currently no viable path to proposing changes to the utilities' TEPs and having those changes reflected in the filings in the general electric rate cases. In theory, comments proposed during an ongoing general electric rate case (through the process herein in Case No. U-21538) that do not impact cost allocation could be incorporated by the utility during or after the rate case. However, Michigan EIBC/United are not aware of any such changes being made to a utility TEP.

Michigan EIBC/United raised concerns about this timing issue in 2024 during the stakeholder engagement process for establishing the TEP filing requirements in Case No. U-21492, stating that “it is unclear what value or purpose there would be for stakeholders to submit comments in the open docket when the only place where changes can actually be made to the TEP proposals and programs is the already ongoing general rate case.”<sup>21</sup> To address this concern and to ensure that stakeholder comments meant to improve the TEPs are assessed and incorporated prior to when the utility finalizes and files its next general rate case in which TEP programs are evaluated, Michigan EIBC/United recommended at that time “that the Commission ensure that TEP filings are required at least 180 days prior to a utility general rate case filing.”<sup>22</sup>

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<sup>21</sup> Michigan Energy Innovation Business Council and Advanced Energy United, Case No. U-21492, “In the matter, on the Commission’s own motion, to open a docket that will be used to collaboratively consider and address issues and concerns related to use and deployment of electric vehicles in a Commission-sponsored technical conference,” July 22, 2024, p. 14, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/0688y00000EgvDMAAZ>.

<sup>22</sup> *Ibid.*

## Recommendation

Now that the concerns regarding the timing of the TEP and rate case filings that Michigan EIBC/United raised two years ago have been realized, Michigan EIBC/United again recommend “that the Commission establish an appropriate filing schedule to ensure that comments filed on the TEPs help to inform utility filings in general rate cases.”<sup>23</sup> Specifically, Michigan EIBC/United recommend that a utility be required to file its TEP 180 days prior to its subsequent general electric rate case filing. This would allow the utilities time to adequately assess and incorporate relevant stakeholder comments provided in the required 45-business day comment period and the subsequent 30-day reply period into the TEP programs filed for cost recovery in the general rate case. This would also provide the Commission with ample time to review the TEP and direct necessary modifications before the Company formally requests TEP program cost recovery in its rate case. Even without Commission action, the Company should voluntarily submit future TEPs at least 180 days prior to any rate case filing, ensuring stakeholders have ample time to provide meaningful input.

## *EV Adoption Forecasts*

The Company reports that there are currently 114,000 EVs in its service territory.<sup>24</sup> From 2021-2025, EV registration experienced a 57 percent compound annual growth rate.<sup>25</sup> Notably, 86 percent of EVs sold in Michigan are in the Company’s service territory, 80 percent of which are all-electric and 20 percent are plug-in hybrid EVs.<sup>26</sup> Using data from S&P Global to assess

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<sup>23</sup> *Ibid.*

<sup>24</sup> DTE Electric Company, “2027-2031 Transportation Electrification Plan,” April 22, 2026, pp. 1-2, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

<sup>25</sup> *Id.*, p. 8.

<sup>26</sup> *Ibid.*

historical adoption trends and from the Electric Power Research Institute (“EPRI”) to determine future market share projections for each vehicle segment within the Company’s service territory,<sup>27</sup> the Company projects that EV registrations, including medium- and heavy-duty vehicles, will increase to over 423,000 in its service territory by 2031.<sup>28</sup>

In accordance with the Commission’s Order in the Company’s 2025 rate case (Case No. U-21860), the Company evaluated the impact of H.R. 1,<sup>29</sup> which repealed several tax credits included in the Inflation Reduction Act, such as the 30C Alternative Fuel Vehicle Refueling Property Credit and the 30D Clean Vehicle Credit,<sup>30</sup> on its EV adoption forecasts in the instant case. The Company indicates that the total cost of ownership modeled over ten years for an EV model increased from \$77,194 to \$85,694 with the loss of the federal tax credits, resulting in a “52 percent decline in total projected EV registrations during the TEP Refresh timeframe relative to the previous TEP forecast.”<sup>31</sup> While the Company acknowledges the impact that H.R. 1 has had on production at automotive manufacturing plants and on the growth rate of EV deployment across its service territory, the Company assumes that the impact will largely be felt in the near term.<sup>32</sup>

The Company also points to other positive and negative influences at the state level that could impact EV adoption in its service territory, such as the increase to the state registration fees

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<sup>27</sup> *Id.*, p. 11.

<sup>28</sup> *Id.*, pp-1-2.

<sup>29</sup> United States Congress, “H.R. 1 - An act to provide for reconciliation pursuant to title II of H. Con. Res. 14.,” 119th congress, 2025-2026, July 4, 2025, Available at <https://www.congress.gov/bill/119th-congress/house-bill/1>.

<sup>30</sup> Evergreen Action, “Republican Megabill Is a Disaster for Energy Costs, Jobs, and Clean Energy,” June 2025, available at <https://www.evergreenaction.com/blog/senate-gops-updated-megabill-isis-still-a-disaster-foraffordability-jobs-and-clean-energy>.

<sup>31</sup> DTE Electric Company, “2027-2031 Transportation Electrification Plan,” April 22, 2026, p. 20. Available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

<sup>32</sup> Direct Testimony of Markus B. Leuker on behalf of DTE Electric Company (“Leuker Direct”), Case No. 22046, p. 25.

resulting from the increase state gas tax passed in October 2025 (negative),<sup>33</sup> the launch of the final round of the Clean Bus Energy Grant funding (positive),<sup>34</sup> and the continuation of the Clean Fuel and Charging Infrastructure (“CFCI”) grant program managed by the Michigan Department of Environment, Great Lakes, and Energy (“EGLE”) (positive).<sup>35</sup>

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<sup>33</sup> Michigan Legislature, “Public Act No. 20,” October 7, 2025, available at <https://www.legislature.mi.gov/documents/2025-2026/publicact/htm/2025-PA-0020.htm>.

<sup>34</sup> *Id.*, p. 19

<sup>35</sup> *Ibid.*

Broadly, EVs' improving range<sup>36, 37, 38, 39</sup> and price competitiveness,<sup>40, 41, 42, 43, 44, 45, 46</sup> the growth of the used EV market,<sup>47, 48, 49, 50</sup> and supportive state actions<sup>51, 52, 53</sup> will enable continued EV

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<sup>36</sup> Elliott, D., World Economic Forum, "5 developments that could make owning an EV more convenient," October 2024, available at <https://www.weforum.org/stories/2024/10/electric-vehicles-batteries-charging/>.

<sup>37</sup> Shakir, U., "Heat pumps in EVs are making a big difference in cold-weather driving," *The Verge*, January 2025, available at <https://www.theverge.com/2025/1/23/24350602/electric-vehicle-heat-pump-better-range-tesla-elonmustang-mach-e>.

<sup>38</sup> Kothari, S., "Even Affordable EVs Are Getting Solid-State Batteries Now," *Inside EVs*, July 2025, available at <https://insideevs.com/news/766509/affordable-evev-solid-state-battery-mg4-china/>.

<sup>39</sup> Ghoshal, A., "BMW promises 30% longer range in upcoming EVs with custom batteries," *New Atlas*, March 2025, available at <https://newatlas.com/automotive/bmw-longer-range-neue-klasse-evev-batteries/>.

<sup>40</sup> Foote, B., "Ford CEO Jim Farley Says Next Gen EVs Will Be Cheaper Than Current Lineup," Ford Authority, June 2025, available at <https://fordauthority.com/2025/06/ford-ceo-jim-farley-says-next-gen-evs-will-be-cheaper-than-current-lineup/>.

<sup>41</sup> Slowik, P. et al., International Council on Clean Transportation, Assessment of light-duty electric vehicle costs and consumer benefits in the United States in the 2022–2035 time frame, October 2022, available at <https://theicct.org/publication/ev-cost-benefits-2035-oct22/>.

<sup>42</sup> Stoklosa, A., "The Super-Affordable 2027 Chevrolet Bolt EV Is Coming Soon—Very Soon," Motortrend, June 2025, available at <https://www.motortrend.com/news/2027-chevrolet-bolt-everything-you-need-to-know>.

<sup>43</sup> Banner, J., "The Cheap Tesla Is Almost Here—and We Finally Know What It'll Look Like," Motortrend, July 2025, available at <https://www.motortrend.com/news/cheap-tesla-model-y-coming-2025>.

<sup>44</sup> Kothari, S., "General Motors Says New LMR Battery Will Deliver Major Cost Savings," Inside EVs, July 2025, available at <https://insideevs.com/news/766646/gm-lmr-battery-cost-savings-lfp/>.

<sup>45</sup> GM News, "GM and LG Energy Solution to pioneer LMR battery cell technology," May 2025, available at <https://news.gm.com/home.detail.html/Pages/news/us/en/2025/may/0513-GM-LG-Energy-Solution-pioneer-LMR-battery-cell-technology.html>.

<sup>46</sup> Mile, N., "Ford's Michigan EV battery plant backed by tax credits after political reboot," Fox: WFXR, July 2025, available at <https://www.wfxrtv.com/automotive/fords-michigan-ev-battery-plant-backed-by-tax-credits-after-political-reboot/?nxsparm=9>.

<sup>47</sup> Toussaint, K., "The first big batch of used EVs will hit the market in 2026. No one knows what's going to happen," Fast Company, January 2024, available at <https://www.fastcompany.com/91018102/the-first-big-batch-of-used-evs-will-hit-the-market-in-2026-no-one-knows-whats-going-to-happen>.

<sup>48</sup> Agostino, S., "Used EV sales are surging — how their ownership costs compare to gas-powered cars," *CNBC*, May 3, 2026, available at <https://www.cnbc.com/2026/05/03/ev-ownership-costs.html>.

<sup>49</sup> Strock, K., "The Fastest-Selling Cars in America Are Used EVs," *Bloomberg*, September 27, 2025, available at <https://www.bloomberg.com/news/articles/2025-09-27/the-us-used-electric-vehicle-market-is-taking-off-here-s-why?embedded-checkout=true>.

<sup>50</sup> Valdez Streaty, S., "EV Market Monitor - April 2026," *Cox Automotive*, May 15, 2026, available at <https://www.coxautoinc.com/insights/ev-market-monitor-april-2026-2/>.

<sup>51</sup> Department of Environment, Great Lakes, and Energy, "Clean Fuel and Charging Infrastructure Program," accessed June 2026, available at <https://www.michigan.gov/egle/about/organization/materials-management/energy/rfps-loans/clean-fuel-and-charging-infrastructure-program>.

<sup>52</sup> Executive Office of the Governor, "Executive Directive 2023-5: Conversion of State Fleet," December 2023, available at <https://www.michigan.gov/whitmer/news/state-orders-anddirectives/2023/12/05/executive-directive-2023-5-conversion-of-state-fleet>.

<sup>53</sup> Michigan Department of Transportation, "MDOT NEVI Design-Build-Operate-Maintain (DBOM) Project - Notification of Selection," June 2025, available at <https://www.michigan.gov/mdot/-/media/Project/Websites/MDOT/Business/Contractors/Innovative-Contracting/NEVI---2/Notification-of-Selection.pdf?rev=6451b2352ab14cd2a84a075496f62c6f&hash=12DC631641D6A886192976DBDA00C8D8>.

adoption growth through the current period of political and economic uncertainty at the federal level. Michigan EIBC/United appreciate and agree with the Company's general acknowledgement of these trends and realities. The Company, however, failed to account for several other external geopolitical and commercial trends that are likely to have an impact on its EV adoption forecasts, such as:

- *Continued National Electric Vehicle Infrastructure (“NEVI”) program funding deployment:* On June 8, 2026, the Michigan Department of Transportation released a \$51 million Request for Proposal for its final round of NEVI formula funding, which is expected to support an additional 60 new charging sites across the state.<sup>54, 55</sup> Experts assert that the existence of public charging infrastructure directly enables customers to purchase EVs.<sup>56, 57, 58, 59</sup> As such, it is reasonable to assume that continued deployment of NEVI chargers will improve consumer visibility of new and existing charging opportunities throughout the state, instilling greater confidence that customers would be adequately supported if they purchase an EV.

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<sup>54</sup> Michigan Department of Transportation, “MDOT Releases NEVI Round 3 RFP to Expand Michigan’s EV Charging Network,” June 8, 2026, available at <https://content.govdelivery.com/accounts/MIDOT/bulletins/41afc3>.

<sup>55</sup> Michigan Department of Transportation, “National Electric Vehicle Infrastructure (DBOM) - Round 3,” accessed June 8, 2026, available at <https://www.michigan.gov/mdot/business/contractors/innovativecontracting/national-electric-vehicle-infrastructure-3>.

<sup>56</sup> Osaka, S., The Washington Post, “For each public charger, here’s how many EVs are looking to plug in,” May 2024, available at <https://www.washingtonpost.com/climate-solutions/2024/05/20/charging-stations-lag-ev-sales/>.

<sup>57</sup> Center for Sustainable Energy, “The State of Electric Vehicle Adoption in the U.S. and the Role of Incentives in Market Transformation,” September 2023, available at <https://energycenter.org/thought-leadership/blog/stateelectric-vehicle-adoption-us-and-role-incentivesmarket#:~:text=Publicly%20available%20EV%20charging%20inspires,apartments%2C%20to%20charge%20an%20EV.>

<sup>58</sup> U.S. Department of Energy, Alternative Fuels Data Center, “Charging Electric Vehicles in Public,” June 2024, available at <https://afdc.energy.gov/fuels/electricity-charging-public>.

<sup>59</sup> International Energy Agency, “Global EV Outlook 2024: Moving towards increased affordability,” 2024, available at <https://iea.blob.core.windows.net/assets/a9e3544b-0b12-4e15-b407-65f5c8ce1b5f/GlobalEVO Outlook2024.pdf>.

- *Volatile fuel costs*: Global oil supply constraints have driven up national average U.S. gas prices by 40 percent, which currently sit above \$4.25 per gallon.<sup>60, 61</sup> While the statewide average gas price in Michigan also hovers around \$4.25, some parts of the state, such as northern Michigan and the Upper Peninsula, are facing costs nearing \$5.00 per gallon, adding hundreds of dollars in fuel costs per year per household.<sup>62, 63, 64</sup> Similarly, the statewide average cost of diesel is close to \$6.00 per gallon.<sup>65</sup> Today, the electricity to charge EVs costs less than half on a per-mile basis compared to gas-powered vehicles,<sup>66</sup> and electricity prices are historically far more stable – only increasing 8.8 percent between 2018 and 2023.<sup>67</sup> These fuel price increases and promises for more stability and predictability are driving increased EV interest<sup>68, 69, 70, 71</sup> and EV adoption. In fact, EV

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<sup>60</sup> Murphy, J. et al., “Graphic: Track U.S., state and county gas prices,” *CNBC*, April 8, 2026, updated June 5, 2026, accessed June 5, 2026, available at <https://www.nbcnews.com/data-graphics/gas-prices-iran-war-state-national-cost-trump-rcna265835>.

<sup>61</sup> AAA, “Fuel Prices,” accessed June 5, 2026, available at <https://gasprices.aaa.com/>.

<sup>62</sup> *Ibid.*

<sup>63</sup> Schuster, S., “Opinion | Michigan can’t control war-driven oil prices. We can control our transportation future,” *Bridge Michigan*, May 7, 2026, available at <https://bridgemi.com/guest-commentary/opinion-michigan-cant-control-war-driven-oil-prices-we-can-control-our-transportation-future/>.

<sup>64</sup> Harring, A., “Iran war cost: Average U.S. household paying \$450 more on gas and energy,” *CNBC*, May 29, 2026, available at <https://www.cnn.com/2026/05/29/energy-costs-inflation-iran-war-trump.html>.

<sup>65</sup> AAA, “Fuel Prices,” accessed June 5, 2026, available at <https://gasprices.aaa.com/>.

<sup>66</sup> EPRI, “The Electric Vehicle (EV) Price Stability Advantage: Electricity vs. Gasoline,” April 15, 2026, available at <https://www.epri.com/research/products/000000003002036139>.

<sup>67</sup> Michigan Citizens Utility Board, “Utility Performance Report – 2025 Edition,” September 4, 2025, available at [https://cubofmichigan.org/wp-content/uploads/2025/09/2025-Utility-Performance-Report\\_20250904.pdf](https://cubofmichigan.org/wp-content/uploads/2025/09/2025-Utility-Performance-Report_20250904.pdf).

<sup>68</sup> Subramanian, P., “Surging gas prices have more than half of car buyers eyeing EVs and hybrids,” *Yahoo! Finance*, April 26, 2026, available at <https://finance.yahoo.com/economy/article/surging-gas-prices-have-more-than-half-of-car-buyers-eyeing-evs-and-hybrids-140000205.html>.

<sup>69</sup> Canal, A., “Rising gas prices have sparked fresh interest in EVs — but affordability is a major barrier,” *NBC News*, April 7, 2026, available at <https://www.nbcnews.com/business/consumer/iran-war-gas-prices-cars-evs-hybrids-rcna266971>.

<sup>70</sup> Garsten, E., “High Gas Prices Boosting Interest In EVs, But Will Sales Follow?,” *Forbes*, April 2, 2026, available at <https://www.forbes.com/sites/edgarsten/2026/04/02/high-gas-prices-boosting-interest-in-evs-but-will-sales-follow/>.

<sup>71</sup> Plummer, I., “Sharp rise in EV interest on Autotrader following Middle East bombing,” *Autotrader Group*, March 24, 2026, available at <https://plc.autotrader.co.uk/news-views/press-releases/sharp-rise-in-ev-interest-on-autotrader-following-middle-east-bombing/>.

adoption increased 59 percent between February and March 2026 – reaching the highest level of national EV adoption since the loss of the federal tax credits in Q4 of 2025.<sup>72, 73</sup>

- *New Heavy-Duty EV models coming on the market:* In March 2026, Tesla opened its first electric semi-truck factory in Nevada, which has a manufacturing capacity of 50,000 semi-trucks a year.<sup>74</sup> While the cost of a new Tesla Semi Long Range and the associated charging depot installation needed to support it is almost double a comparable diesel truck, Tesla suggests that given higher diesel costs, businesses can save between \$147,000-\$404,000 over five to ten years of ownership.<sup>75, 76</sup> With contracts already in place with customers like PepsiCo,<sup>77</sup> DHL,<sup>78</sup> Walmart,<sup>79</sup> and Costco<sup>80</sup> and the national average cost of diesel up

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<sup>72</sup> Malhotra, I., “EV Sales Show Modest Rebound in March,” *Atlas Public Policy*, June 2, 2026, available at <https://www.atlasevhub.com/weekly-digest/ev-sales-show-modest-rebound-in-march/>.

<sup>73</sup> Meredith, S. and M. Wayland., “EV demand is getting a boost from the Iran war — just as auto giants pivot back to combustion engines,” *CNBC*, April 2, 2026, available at <https://www.cnbc.com/2026/04/02/evs-autos-energy-oil-iran-war-electric-transport-fossil-fuels.html>.

<sup>74</sup> Lambert, F., “Tesla Semi: first truck rolls off high-volume production line,” *Electrek*, April 29, 2026, available at <https://electrek.co/2026/04/29/tesla-semi-first-truck-high-volume-production-line/>.

<sup>75</sup> Lambert, F., “Tesla Semi can save over \$400K vs diesel, but there are big ‘ifs’,” *Electrek*, May 4, 2026, available at <https://electrek.co/2026/05/04/tesla-semi-tco-analysis-diesel-savings-electricity-price/>.

<sup>76</sup> Nichole, A., “The Tesla Semi Will Cost Double a Standard Truck—but the Math Shows It Could Kill Off Diesels: After years of limited production, Tesla is ramping up its Semi rollout while making a compelling economic case that could reshape America’s freight,” *Inc.com*, available at <https://www.inc.com/amaya-nichole/tesla-semi-math-vs-diesel-costs/91322766>.

<sup>77</sup> Hineman, B., “PepsiCo to add 50 Tesla electric semi-trucks to California fleet,” *Yahoo Finance*, May 23, 2024, available at [https://finance.yahoo.com/news/pepsico-add-50-tesla-electric-201254098.html?guccounter=1&guce\\_referrer=aHR0cHM6Ly9icmlkZ2VtaS5jb20v&guce\\_referrer\\_sig=AQAAAA8u3VPSiLYY9B4qViXxQ8CKOfT0Q2d-YndqWMCX93AtLi1bckWq9kEYdYArb60TK2b3mfLZmteyXfNU80I1UUwnCnEtF9zh0JuNV5PYw-7FyUmulYbegsCsmPjRWm5BGRHwYeNHs1A1eU\\_-SAzmfrzYnsHrpjV\\_\\_XvYHj\\_z3ZeW](https://finance.yahoo.com/news/pepsico-add-50-tesla-electric-201254098.html?guccounter=1&guce_referrer=aHR0cHM6Ly9icmlkZ2VtaS5jb20v&guce_referrer_sig=AQAAAA8u3VPSiLYY9B4qViXxQ8CKOfT0Q2d-YndqWMCX93AtLi1bckWq9kEYdYArb60TK2b3mfLZmteyXfNU80I1UUwnCnEtF9zh0JuNV5PYw-7FyUmulYbegsCsmPjRWm5BGRHwYeNHs1A1eU_-SAzmfrzYnsHrpjV__XvYHj_z3ZeW).

<sup>78</sup> Lambert, F., “DHL takes delivery of its first Tesla Semi electric truck, says more to come next year,” *Electrek*, December 8, 2025, available at <https://electrek.co/2025/12/08/dhl-takes-tesla-semi-electric-truck/>.

<sup>79</sup> Lambert, F., “Tesla Semi is getting into the hands of two more big customers,” *Electrek*, May 7, 2024, available at <https://electrek.co/2024/05/07/tesla-semi-hands-two-more-big-customers/>.

<sup>80</sup> *Ibid.*

53 percent,<sup>81, 82</sup> it is reasonable to expect increased electrification across the commercial sector, especially among heavy-duty fleet operators.

As the evidence demonstrates, there will always be external forces pushing and pulling the EV market, and understanding those factors can provide valuable context for evaluating adoption trends. However, those short-term influences should not overshadow the need to plan for the long-term growth of transportation electrification.

While it is important to understand the impact of external factors on electric vehicle (EV) adoption within the Company's service territory, Michigan EIBC/United cautions the Commission against relying too heavily on these short-term trends as a basis for scaling back critical EV programs. Such an approach risks overlooking the broader, long-term trajectory of transportation electrification. Although near-term market conditions may influence the pace of adoption, EV ownership—and the associated electric load—is expected to continue growing over time.<sup>83, 84, 85,</sup>  
<sup>86, 87</sup> Utilities must be prepared for this transition by maintaining investments that support EV deployment, grid readiness, and customer adoption. Reducing these programs in response to

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<sup>81</sup> Nichole, A., “The Tesla Semi Will Cost Double a Standard Truck—but the Math Shows It Could Kill Off Diesels: After years of limited production, Tesla is ramping up its Semi rollout while making a compelling economic case that could reshape America’s freight,” *Inc.com*, available at <https://www.inc.com/amaya-nichole/tesla-semi-math-vs-diesel-costs/91322766>.

<sup>82</sup> AAA, “Fuel Prices,” accessed June 5, 2026, available at <https://gasprices.aaa.com/>.

<sup>83</sup> Smart Electric Power Alliance, *Preparing for an Electric Vehicle Future: How Utilities Can Succeed*, accessed June 10, 2026, available at <https://sepapower.org/resource/preparing-for-an-electric-vehicle-future-how-utilities-can-succeed/>.

<sup>84</sup> Bloomberg, “Despite Hurdles, Vehicle Electrification in the US Is Likely Here to Stay, Finds Bloomberg Intelligence,” April 5, 2024, available at <https://www.bloomberg.com/company/press/despite-hurdles-vehicle-electrification-in-the-us-is-likely-here-to-stay-finds-bloomberg-intelligence/>.

<sup>85</sup> Bloomberg New Energy Finance, “Electric Vehicle Outlook 2025 Overview,” accessed June 10, 2026, available at <https://assets.bbhub.io/professional/sites/24/202506-EVO2025-Executive-Summary.pdf>.

<sup>86</sup> International Energy Agency, “Global EV Outlook 2026: Trends in electric cars,” accessed June 10, 2026, available at <https://www.iea.org/reports/global-ev-outlook-2026/trends-in-electric-cars>.

<sup>87</sup> McCarthy, D., “Electric cars are starting to take over the world,” *Canary Media*, June 5, 2026, available at <https://www.canarymedia.com/articles/electric-vehicles/electric-cars-starting-take-over-world>.

temporary market fluctuations could leave utilities ill-equipped to meet future demand and capture the long-term benefits of transportation electrification.

### Recommendation

Michigan EIBC/United strongly support the Company's EV adoption forecasts. While recognizing current market volatility and external headwinds, DTE's analysis confirms that global vehicle electrification will continue to grow. This sustained commitment will provide utilities with a clear opportunity to capitalize on customer benefits and proactively prepare the grid for anticipated new loads. In addition to the current forecast, Michigan EIBC/United recommend continued evaluation of external forces, such as but not limited to the repeal of the federal EV tax credits and fuel cost volatility, for informational purposes, but caution the Company against looking to short-term forecast shifts as justification to scale back the Company's transportation electrification programs.

### *Benefit-Cost Analysis ("BCA")*

In the final Order in the Company's 2025 rate case (Case No. U-21860), the Commission required the Company to propose "an accounting scheme that accurately captures the full [net present value, "NPV"] NPV benefits, including all revenue attributable to charging and associated network effects, provided by its programs across customer classes."<sup>88</sup> In accordance with this Order, the Company's updated BCA, based on the NPV of the net revenue requirement, indicates that the proposed TEP portfolio produces over \$1.8 billion in NPV of net rate relief to all DTE customers.<sup>89</sup>

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<sup>88</sup>Michigan Public Service Commission, Case No. U-21860, "Order: In the matter of the application of DTE Electric Company for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority," February 19, 2026, p. 434, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001kHayeAAC>.

<sup>89</sup> DTE Electric Company, "2027-2031 Transportation Electrification Plan," April 22, 2026, pp. 78-85, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

The Company’s baseline BCA assumes 100 percent of projected EV adoption, finding that long-term benefits are provided across the segment and portfolio levels.<sup>90</sup> This improved methodology more accurately captures the known network effects of EV charging. Specifically, the existence of public EV charging stations directly enables customers to purchase EVs,<sup>91, 92, 93, 94</sup> leading to significant at-home charging and revenue from electricity sales.<sup>95, 96, 97, 98, 99</sup> In fact, according to a Synapse Energy Economics study examining the revenues and costs associated with EVs between 2011 and 2024, EV drivers have contributed approximately \$167 million more than their associated costs in Michigan.<sup>100</sup> As such, Michigan EIBC/United strongly support the expansion of the Company’s BCA to evaluate not only the revenue attributable to rebated EV chargers, but all EV chargers across its service territory.

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<sup>90</sup> *Id.*, p. 78.

<sup>91</sup> Osaka, S., *The Washington Post*, “For each public charger, here’s how many EVs are looking to plug in,” May 2024, available at <https://www.washingtonpost.com/climate-solutions/2024/05/20/charging-stations-lag-ev-sales/>.

<sup>92</sup> Center for Sustainable Energy, “The State of Electric Vehicle Adoption in the U.S. and the Role of Incentives in Market Transformation,” September 2023, available at <https://energycenter.org/thought-leadership/blog/stateelectric-vehicle-adoption-us-and-role-incentivesmarket#:~:text=Publicly%20available%20EV%20charging%20inspires,apartments%2C%20to%20charge%20an%20EV.>

<sup>93</sup> U.S. Department of Energy, Alternative Fuels Data Center, “Charging Electric Vehicles in Public,” June 2024, available at <https://afdc.energy.gov/fuels/electricity-charging-public>.

<sup>94</sup> International Energy Agency, “Global EV Outlook 2024: Moving towards increased affordability,” 2024, available at <https://iea.blob.core.windows.net/assets/a9e3544b-0b12-4e15-b407-65f5c8ce1b5f/GlobalEVOutlook2024.pdf>.

<sup>95</sup> Nadel, S., American Council for an Energy Efficient Economy (ACEEE), “Charging Ahead: How EVs Could Drive Down Electricity Rates,” January 2024, available at <https://www.aceee.org/blog-post/2024/01/charging-ahead-how-evs-could-drive-down-electricity-rates>.

<sup>96</sup> Metz, L. et al., Synapse Energy Economics, Inc., Distribution System Investments to Enable Medium- and Heavy-Duty Vehicle Electrification: A Case Study of New York,” April 2023, available at <https://acrobat.adobe.com/id/urn:aaid:sc:US:3ef62d18-a652-4848-a2a5-15eb2771d8cc>.

<sup>97</sup> Synapse Energy Economics, “EVs Are Driving Rates Down for All Customers: State-by-State Cumulative EV Net Rate Impact Summary June 2024,” available at [https://www.synapse-energy.com/sites/default/files/EV%20All%20State%20List%20PDF\\_0.pdf](https://www.synapse-energy.com/sites/default/files/EV%20All%20State%20List%20PDF_0.pdf).

<sup>98</sup> Satchwell, A. et al., Prepared for the U.S. Department of Energy, “Quantifying the Financial Impacts of Electric Vehicles on Utility Ratepayers and Shareholders February 2023,” available at [https://etapublications.lbl.gov/sites/default/files/ev\\_financial\\_impacts\\_final\\_report\\_final\\_draft\\_02092023.pdf](https://etapublications.lbl.gov/sites/default/files/ev_financial_impacts_final_report_final_draft_02092023.pdf).

<sup>99</sup> California Public Utilities Commission, “Utility Cost and Affordability of the Grid of the Future: An Evaluation of Electric Costs, Rates, and Equity Issues Pursuant to P.U. Code Section 913.1. 2021,” available at: [https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2021/senate-bill-695-report-2021-and-en-bancwhitepaper\\_final\\_04302021.pdf](https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2021/senate-bill-695-report-2021-and-en-bancwhitepaper_final_04302021.pdf).

<sup>100</sup> Shenstone-Harris, S., Synapse Energy Economics, “Driving Affordable Rates with EVs: Michigan,” April 2026, available at [https://www.synapse-energy.com/sites/default/files/25-136%20Michigan%20Factsheet\\_2.pdf](https://www.synapse-energy.com/sites/default/files/25-136%20Michigan%20Factsheet_2.pdf).

While the Company's updated BCA represents a vast improvement from previous BCAs, the Commission Order clearly indicated that it should capture "the full NPV benefits including all revenue attributable to charging and associated network effects, provided by its programs across customer classes."<sup>101</sup> The Company effectively captures all revenue attributable to charging, but, by failing to address the societal benefits associated with charging that increase over time as EV adoption and EV charging increase, the Company's analysis fails to address all of the network effects associated with its programs.

Societal benefits associated with increased transportation electrification include reduced greenhouse gas emissions, reduced criteria pollutant emissions, reduced noise pollution, reduced transportation fuel costs, improved physical and mental health, job creation, and economic impacts.<sup>102, 103</sup> As exhibited in Commonwealth Edison ("ComEd")<sup>104</sup> and Ameren's<sup>105</sup> Beneficial

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<sup>101</sup> Michigan Public Service Commission, Case No. U-21860, "Order: In the matter of the application of DTE Electric Company for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority," February 19, 2026, p. 434, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001kHayAAC>.

<sup>102</sup> American Council for an Energy-Efficient Economy, "Cost-Effectiveness Tests: Overview of State Approaches to Account for Health and Environmental Benefits of Energy Efficiency," December 2018, available at <https://www.aceee.org/sites/default/files/he-ce-tests-121318.pdf>.

<sup>103</sup> Armstrong, S., "Killing the Roar: Electric Vehicles Can Calm Us Down," *The London Evening Standard*, July 2022, available at <https://www.standard.co.uk/optimist/plug-it-in/electric-vehicles-duncan-williams-noise-soundb1010886.html>.

<sup>104</sup> Illinois Commonwealth Edison, "ComEd Beneficial Electrification Plan," 2022, available at <https://icc.illinois.gov/docket/P2022-0432/documents/325766/files/567114.pdf>.

<sup>105</sup> Ameren Illinois Company, "Beneficial Electrification Plan," 2022, available at <https://www.icc.illinois.gov/docket/P2022-0431/documents/325722/files/567031.pdf>.

Electrification Plans, as well as Xcel Energy’s Minnesota<sup>106</sup> and Colorado<sup>107</sup> TEPs, reduced greenhouse gas emissions and reduced criteria pollutant emissions can be accurately quantified by using the Federal Social Cost of Carbon (“SCC”).<sup>108</sup> Developed by a federal interagency working group to calculate the benefits of carbon dioxide (“CO<sub>2</sub>”) reductions in 2010 and updated in 2016, the SCC represents an estimate of the monetized net economic damages associated with one metric ton of CO<sub>2</sub> emissions. As discussed in the Direct Testimony of Dr. Laura Sherman in DTE’s 2024 general electric rate case (Case No. U-21534),

Greenhouse gas emissions reductions can be quantified by comparing the difference between emissions from EV charging (i.e., based on emissions related to electricity generation) and emissions from internal-combustion engine vehicles.<sup>109, 110</sup> This difference can then be converted into a cost of avoided emissions using an SCC.<sup>111</sup>

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<sup>106</sup> Minnesota Xcel Energy, “Petition of Northern States Power Company for Approval of a Public Charging Network, an Electric School Bus Pilot, and Program Modifications,” 2022, available at <https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={90B25F82000-C32B-B70E-1C25A3E2A491}&documentTitle=20228-188061-07>.

<sup>107</sup> Xcel Colorado Energy, “Benefit-Cost Analysis of Transportation Electrification in the Xcel Energy Colorado Service Territory,” May 2020, available at [https://www.dora.state.co.us/pls/efi/efi.show\\_document?p\\_dms\\_document\\_id=926529&p\\_session\\_id=](https://www.dora.state.co.us/pls/efi/efi.show_document?p_dms_document_id=926529&p_session_id=)

<sup>108</sup> Interagency Working Group on Social Cost of Greenhouse Gases, “Social Cost of Carbon, Methane, and Nitrous Oxide-Interim Estimates Under Executive Order 13990,” February 2021, available at <https://www.energy.gov/sites/default/files/2023-04/57.%20Social%20Cost%20of%20Carbon%202021.pdf>.

<sup>109</sup> California Public Utilities Commission, “Pacific Gas and Electric Company 2017 General Rate Case Phase II Updated and Amended Prepared Testimony,” Exhibit (PG&E-9) Volume 1 Marginal Costs, 2016, available at <https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A1606013/319/170773573.pdf>.

<sup>110</sup> Energy & Environmental Economics, “Technical Potential for Local Distributed Photovoltaics in California,” 2012, available at [https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc\\_website/content/utilities\\_and\\_industries/energy/reports\\_and\\_white\\_papers/ldpvpotentialreportmarch2012.pdf](https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_website/content/utilities_and_industries/energy/reports_and_white_papers/ldpvpotentialreportmarch2012.pdf).

<sup>111</sup> Direct Testimony of Dr. Laura S. Sherman on behalf of The Michigan Energy Innovation Business Council and Institute for Energy Innovation, Case No. U-21534, p. 27, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/0688y00000EmMIXAA3>.

In addition to several state legislatures (e.g. New Jersey,<sup>112</sup> Illinois,<sup>113</sup> and Colorado<sup>114</sup>) and public utility commissions (California,<sup>115</sup> Illinois,<sup>116</sup> Minnesota,<sup>117</sup> Nevada,<sup>118</sup> New York,<sup>119</sup> Oregon,<sup>120</sup> and Washington<sup>121</sup>) that have identified the SCC as the best mechanism to quantify the social cost of CO<sub>2</sub> emissions and, therefore, the social benefits of reduced emissions, several utilities have effectively incorporated the SCC into their TEP BCAs.<sup>122, 123, 124, 125, 126</sup>

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<sup>112</sup> See NJ REV. STAT. § 48:3-87.3(8).

<sup>113</sup> See 220 ILCS 3855/1-75(d-5)(1)(B)(i).

<sup>114</sup> 2019 Colo. Sess. Laws 3290, available at [https://leg.colorado.gov/sites/default/files/documents/2019A/bills/sl/2019a\\_sl\\_359.pdf](https://leg.colorado.gov/sites/default/files/documents/2019A/bills/sl/2019a_sl_359.pdf).

<sup>115</sup> Public Utilities Commission of the State of California, Decision 19-05-019, “Decision Adopting Cost-Effectiveness Analysis Framework Policies for all Distributed Energy Resources,” May 2019, available at <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M293/K833/293833387.PDF>.

<sup>116</sup> See 220 ILCS 3855/1-75(d-5)(1)(B)(i).

<sup>117</sup> Minnesota Public Utilities Commission, E-999/CI-14-643, “In the Matter of the Further Investigation into Environmental and Socioeconomic Costs Under Minnesota Statutes Section 216B.2422, Subdivision 3,” January 2018, available at [https://costofcarbon.org/files/MPUC\\_E-999\\_CI-14-643.pdf](https://costofcarbon.org/files/MPUC_E-999_CI-14-643.pdf).

<sup>118</sup> Public Utilities Commission of Nevada, Docket No. 17-07020, “Investigation and rulemaking to implement Senate Bill 65 (2017),” August 2018, available at [https://pucweb1.state.nv.us/PDF/AxImages/DOCKETS\\_2015\\_THRU\\_PRESENT/2017-7/32153.pdf](https://pucweb1.state.nv.us/PDF/AxImages/DOCKETS_2015_THRU_PRESENT/2017-7/32153.pdf).

<sup>119</sup> New York Independent System Operator (NYISO), “Carbon Pricing Draft Recommendations: A Report Prepared for the Integrating Public Policy Task Force,” August 2018, available at <https://www.nyiso.com/documents/20142/2179214/carbon%20pricing%20draft%20recommendations%2020180802.pdf/575a6d2b-ad09-d8f8-e566-39a0c04f9a43>.

<sup>120</sup> Public Utility Commission of Oregon, Order No. 25-028, “In the Matter of Public Utility Commission of Oregon, Update to Staff Guidance on Transportation Electrification Planning,” February 5, 2025, available at <https://apps.puc.state.or.us/orders/2025ords/25-028.pdf>.

<sup>121</sup> Washington Utilities and Transportation Commission, Docket UE-160799, “Commission Proceeding to Develop a Policy Statement to Address Electric Vehicle Charging Infrastructure Needs: Policy Statement Regarding Electric Vehicle Charging Infrastructure,” May 28, 2026, available at <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=266&year=2016&docketNumber=160799>.

<sup>122</sup> Direct Testimony of Dr. Laura S. Sherman on behalf of The Michigan Energy Innovation Business Council and Institute for Energy Innovation, Case No. U-21534, pp. 30-32, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/0688y00000EmMIXAA3>.

<sup>123</sup> Illinois Commonwealth Edison, “ComEd Beneficial Electrification Plan,” 2022, available at <https://icc.illinois.gov/docket/P2022-0432/documents/325766/files/567114.pdf>.

<sup>124</sup> Illinois Commerce Commission, Direct Testimony of Andrew Cottrell, Applied Energy Group, Inc., June 2022, available at <https://www.icc.illinois.gov/docket/P2022-0431/documents/325722/files/567037.pdf>.

<sup>125</sup> Minnesota Xcel Energy, Petition of Northern States Power Company for Approval of a Public Charging Network, an Electric School Bus Pilot, and Program Modifications,” 2022, available at <https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={90B25F82000-C32B-B70E-1C25A3E2A491}&documentTitle=20228-188061-07>.

<sup>126</sup> Xcel Colorado Energy, “Benefit-Cost Analysis of Transportation Electrification in the Xcel Energy Colorado Service Territory,” May 2020, available at [https://www.dora.state.co.us/pls/efi/efi.show\\_document?p\\_dms\\_document\\_id=926529&p\\_session\\_id=](https://www.dora.state.co.us/pls/efi/efi.show_document?p_dms_document_id=926529&p_session_id=)

The adoption and use of the SCC clearly shows that societal costs and benefits can be quantified and monetized, and as seen in many utilities, those benefits can be applied to utility TEP BCAs when evaluating TEP portfolios. In the case of transportation electrification, as EV adoption and EV charging increase, the societal benefits of reduced emissions across the Company's service territory will also increase. By definition, direct network effects occur when the value of a good increases because the number of users of that good increases.<sup>127</sup> Consequently, societal benefits, such as CO<sub>2</sub> emissions reductions are a quantifiable, monetizable effect of the growing EV charging network in the Company's service territory. Therefore, given that, in accordance with the Commission's Order in Case No. U-21860, the evaluation of network effects must be included in the Company's BCA, transitively, societal benefits must also be included in the Company's BCA.

### Recommendation

In order to fully comply with the Commission's Order in Case No. U-21860, Michigan EIBC/United recommends that the Company account for societal benefits in its BCA. In addition to the other changes already proposed by the Company, this will ensure that all relevant network effects associated with the Company's TEP programs are more completely captured and, therefore, that the value of the TEP programs can be understood more holistically.

### *Reallocation of Rebate Program Funding*

The regulatory asset treatment of the TEP rebate programs allows for a maximum level of spending within a given authorized timeframe.<sup>128</sup> In the event that the Company depletes the funds approved

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<sup>127</sup> Stobierski, T., Harvard Business School, "What are Network Effects?" November 12, 2020, accessed June 9, 2026, available at <https://online.hbs.edu/blog/post/what-are-network-effects>.

<sup>128</sup> Direct Testimony of Neal T. Foley on behalf of DTE Electric Company, Case No. U-21860, April 24, 2025, p. 18, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00000lnIwAAI>.

for a specific rebate program, it would need to stop issuing rebates for that program until such a time that the Company receives Commission approval for more funds or a reallocation of program funds.<sup>129</sup> In its 2025 general electric rate case (Case No. U-21860), the Company proposed that it should be able to

reallocate funding between rebate programs as needed. Said differently, the Commission is authorizing a total level of Regulatory Asset treatment, and not specific rebate program levels.<sup>130</sup>

This would allow the Company to ensure that popular subsegments of the rebate programs that exceed targeted adoption levels can continue without interruption.<sup>131</sup> Conceptually, Michigan EIBC/United agreed that giving the Company authority to reallocate funding would ensure the efficient and effective deployment of TEP program funds, but raised concerns that unilateral reallocation of approved rebate funding without appropriate guardrails, stakeholder input, or Commission oversight could undermine the formal review process.<sup>132</sup> As such, Michigan EIBC/United recommended that the Commission reject the Company's request to reallocate funds:

until and unless the Commission initiates a stakeholder engagement proceeding to establish clearly defined transportation electrification programs and to define a process by which the Commission will review future reallocation requests.<sup>133</sup>

In its Final Order (Case No. U-21860), the Commission indicated that TEP filing requirements, process issues, and design issues should be handled in a separate proceeding and “decline[d] to

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<sup>129</sup> *Ibid.*

<sup>130</sup> *Id.* p. 17.

<sup>131</sup> *Id.* p. 18.

<sup>132</sup> Direct Testimony of Sophia Schuster on behalf of The Michigan Energy Innovation Business Council and Institute for Energy Innovation, Case No. U-21860, p. 66, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs000016pyuNAAQ>.

<sup>133</sup> *Id.*, p. 68.

rule on the issue of who should propose guardrails with respect to future cost shifting between rebate programs [and] urge[d] interested parties to address these issues in the appropriate docket.”<sup>134</sup> While it remains unclear why the process by which reallocation of funding for ratepayer supported rebate programs is not more suitably addressed in the rate case proceedings, Michigan EIBC/United presume that the Commission’s intended appropriate docket is the instant case (Case No. U-21538).

As such, Michigan EIBC/United reintroduce the discussion and highlight the merit of the concept, which, as the Company suggested, would improve the efficiency and effectiveness of the deployment of the TEP rebate programs. The start–stop cadence of these programs disrupts underlying market signals, creating uncertainty for developers, contractors, and customers. This instability likely weakens participation, reduces investment confidence, and ultimately dampens program uptake. A streamlined approval or administrative review pathway for reallocations or adjustments would therefore help preserve continuity without requiring full regulatory proceedings. Absent this, delays associated with formal filings can hinder market actors’ ability to respond in real time, compounding confusion and limiting program effectiveness.

If guardrails under which the Company could reallocate funds were established and implemented, as indicated in Case No. U-21860, the following issues could be considered:

- *The outreach efforts committed to each subsegment.* Most importantly, it must be evident that the Company has taken the appropriate amount of effort to advertise and engage

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<sup>134</sup> Michigan Public Service Commission, Case No. U-21860, “Order: In the matter of the application of DTE Electric Company for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority,” February 19, 2026, p. 262, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001kHayeAAC>.

prospective customers to apply for the TEP program subsegment from which the Company is proposing to reallocate funds. What is defined as “appropriate amount of effort” could vary based on the segment or sub-segment or on whether the target customer is LI or non-LI, but some measures of effort could include:

- The number of direct communication touchpoints with prospective customers and how that relates to the conversion rate (i.e. how many prospective customers complete an application and the associated installation) or changes to volume of program applications; or
- Proven adjustments to education & outreach methods that exhibit the Company’s attempt to improve means of communication to improve prospective customer engagement, etc.

This would help to ensure that the lack of participation is not falsely attributed to a lack of interest when the real issue may be a lack of awareness. Additionally, the Company should be required to provide an assessment detailing the reasons for low program demand in the subsequent general electric rate case to allow feedback for future program improvements and recommendations;<sup>135</sup> and

- *The adoption levels of each rebate program subsegment.* To do this, the Commission could define a percentage of the maximum capacity, based on informed stakeholder input, that would trigger a program assessment for reallocation. For example, if a program has only issued 5 percent of the total issuance goal of 100 rebates, this could suggest that funds could be moved from this subsegment to another subsegment that has higher demand.

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<sup>135</sup> Direct Testimony of Sophia Schuster on behalf of The Michigan Energy Innovation Business Council and Institute for Energy Innovation, Case No. U-21860, p. 67, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs000016pyuNAAQ>.

Conversely, if a program subsegment has reached 90 percent of its rebate issuance target, this would indicate that it may be eligible to draw funds from another subsegment with lower demand.<sup>136</sup> Such a defined adoption level should also consider other factors, such as the amount of time that the program has been implemented and any revisions introduced since program approval, as low participation could indicate that more time is needed to build market awareness, conduct education, and engage a more diverse stakeholder network to drive participation.

To allow as much flexibility as possible, it could also be appropriate to set a standard maximum reallocation allowance. This concept was implemented by the Massachusetts Department of Public Utilities in reference to the state's utilities' 2022-2025 Grid Modernization Plans, which includes EV program funding.<sup>137</sup> This Order permitted the Massachusetts utilities

to shift not more than 15 percent of their total grid modernization budget between each investment category to respond to evolving market conditions. The Department also allowed the Companies to shift spending between years over the four-year term of the program, subject to the 15 percent budget cap variance for each investment category.<sup>138</sup>

The Massachusetts Department of Public Utilities found that “allowing the companies a certain level of flexibility to adjust their program segment budgets in response to EV market trends and

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<sup>136</sup> *Id.*, pp. 67-68.

<sup>137</sup> The Commonwealth of Massachusetts, Department of Public Utilities, D.P.U. 21-90, 21-91, 21-92; “Petition of NSTAR Electric Company d/b/a Eversource Energy for approval of its Phase II Electric Vehicle Infrastructure Program and Electric Vehicle Demand Charge Alternative Proposal; Petition of Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, for approval of its Phase III Electric Vehicle Market Development Program and Electric Vehicle Demand Charge Alternative Proposal; Petition of Fitchburg Gas and Electric Light Company d/b/a Unitil for approval of its Electric Vehicle Infrastructure Program, Electric Vehicle Demand Charge Alternative Proposal, and Residential Electric Vehicle Time-of-Use Rate Proposal,” December 30, 2022, available at <https://260434.fs1.hubspotusercontent-na1.net/hubfs/260434/Final%20Order%20EV%20Dockets%20December%202022%20D.P.U.%2021-90%20D.P.U.%2021-91%20D.P.U.%2021-92.pdf>.

<sup>138</sup> *Id.*, p. 130.

customer preferences will improve overall program implementation.”<sup>139</sup> Similar program budget flexibility was implemented in Illinois, allowing ComEd to move funding across approved budget programs without additional approval from the Illinois Commerce Commission, subject to six conditions recommended by Staff.<sup>140</sup> These conditions included that (1) the Company must continue to adhere to the statutory retail rate cap of 1% per year of the annual revenue requirement, (2) no funding be shifted from LI to non-LI recipients, (3) no funding should not be transferred from approved transportation programs to other non-transportation programs, (4) no funding be shifted into the pilot programs, (5) the overall Beneficial Electrification Plan spend be equal to or less than the Commission-approved overall budget, and (6) the annual plan report include a budget to actual cost comparison that explains adjustments made to each program and sub-program.<sup>141</sup>

Having a threshold or guardrails in place would make it easier to respond to market dynamics quickly while also having some oversight for bigger changes. To support similar efficiency improvements, Michigan EIBC/United reiterate support for the concept of funding reallocation subject to the development and implementation of reasonable guardrails or requirements to which the Company would have to adhere.

### Recommendation

Michigan EIBC/United strongly urge the Company to develop recommended guardrails for the purposes of enabling responsible and reasonable reallocation of TEP rebate funding from one

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<sup>139</sup> *Ibid.*

<sup>140</sup> Illinois Commerce Commission, Case No. 22-0432 and 22-0442, “Order: Commonwealth Edison Company Petition for Approval of Beneficial Electrification Plan under the Electric Vehicle Act, 20 ILCS 627/45 and New EV Charging Delivery Classes under the Public Utilities Act, Article IX; Illinois Commerce Commission On Its Own Motion-vs-Commonwealth Edison Company Investigation into Commonwealth Edison Company Beneficial Electrification Plan Filing pursuant to 20 ILCS 627/45,” March 23, 2023.

<sup>141</sup> *Ibid.*

program to another. Separately, and depending on the outcomes of this process, this proposal could form the basis for a broader, statewide straw proposal from Commission Staff, which would ultimately be open to comments and subject to Commission approval.

### *Education and Outreach (“E&O”)*

For its broad E&O efforts, the Company describes several tactics, including “bill messages, digital ads, emails, social media, print materials including dealership signs, rEV student presentations, ride and drive events, and in-person EV learning experiences.”<sup>142</sup> Additionally, DTE also manages its Fleet Advisory Services to help guide fleet operators through the electrification process, and in 2025, it introduced its Multifamily EV Advisory Services to support MUD property owners through their EV charging deployment journey from project assessment to installation.<sup>143</sup> The Company proposes to increase total E&O spending to \$8 million to “build on [the] program’s success, expand support for more events, and present rEV to more students, an EV educational program for schools led by the National Energy Foundation.”<sup>144</sup>

As important mechanisms to ensure the efficient use of existing utility assets and enable proactive utility planning, utility E&O programs are essential to unlocking the benefits that EVs have to offer to all customers and the grid. As experts in local grid capacity and as managers of EV charging rebate programs, utilities are ideal conduits for information about the benefits of EVs and what customers would need to comfortably transition to an EV for personal or commercial

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<sup>142</sup> Direct Testimony of Sophia Schuster on behalf of The Michigan Energy Innovation Business Council and Institute for Energy Innovation, Case No. U-21860, p. 67, available at <https://mipsc.my.site.com/sfc/servlet.shepherd/version/download/068cs000016pyuNAAQ>.

<sup>143</sup> *Id.*, p. 70.

<sup>144</sup> *Ibid.*

purposes.<sup>145</sup> Given the pivotal role that E&O has to play in enabling efficient deployment of utility EV charging programs, Michigan EIBC/United strongly support the Company’s commitment to the success of its E&O efforts. However, it remains unclear exactly what “build[ing] on [the] program’s success [and] expand[ing] support for more events,” means or what, specifically, the Company proposes to do.<sup>146</sup>

Michigan EIBC/United raised similar concerns in the Company’s 2025 general electric rate case (Case No. U-21860) and noted that with the exception of some active or targeted outreach efforts, such as “rEV student presentations, ride and drive events, and in-person EV learning experiences,”<sup>147</sup> the Company largely relies on passive communication methods, such as “bill messages, digital ads, emails, social media, [and] print materials including dealership signs.”<sup>148</sup>

<sup>149</sup> Broadly, while traditional, passive communication works well for established technologies, introducing new innovations demands highly active strategies to drive consumer engagement and

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<sup>145</sup> Alliance for Transportation Electrification and Plug In America, *The Missing Piece on Meeting Transportation Electrification Goals: Utility Education and Outreach Programs*, December 2020, available at <https://evtransportationalliance.org/wp-content/uploads/2021/11/2020-Education-Outreach-White-Paper.pdf>.

<sup>146</sup> DTE Electric Company, Case No. U-21538, “2027-2031 Transportation Electrification Plan,” April 22, 2026, p. 70, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

<sup>147</sup> DTE Electric Company, Case No. U-21538, “2027-2031 Transportation Electrification Plan,” April 22, 2026, p. 69, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

<sup>148</sup> *Ibid.*

<sup>149</sup> Passive marketing is a marketing approach that focuses on creating and distributing content or information that attracts potential customers organically, allowing consumers to initiate engagement when they are ready rather than through direct outreach by the marketer. Conversely, active/targeted marketing is a proactive marketing approach in which organizations identify specific customer segments and direct personalized communications and promotional activities toward those groups to increase relevance and conversion rates. See Wilson, C., “Passive vs Active Marketing: Which is which, and why should you care?,” *Medium*, July 25, 2023, available at <https://medium.com/illumination/passive-vs-active-marketing-5933c170ff17>.

prompt action.<sup>150, 151, 152, 153</sup> This is especially important because, as described below and in the Company's TEP, several of the Company's rebate programs have either low engagement or low completion rates. More proactive engagement with key stakeholders like official automotive manufacturing channels, car dealerships, MUD property owners, fleet operators, and community leaders could improve conversion success rate and enable businesses to optimize spending.<sup>154, 155</sup> In fact, research suggests that more personalized marketing strategies can reduce utility per-customer acquisition costs by as much as 50 percent and increase utility return on investment ("ROI") by 10 to 30 percent.<sup>156</sup>

In Case No. U-21860, based on the information available regarding the Company's E&O efforts, Michigan EIBC/United provided extensive comments identifying key considerations among various customer segments, pointing to several shortcomings of DTE's current E&O practices, benchmarking E&O activities being performed at other utilities across customer segments, and suggesting opportunities and key metrics to track to improve the Company's existing programs.<sup>157</sup>

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<sup>150</sup> United States Department of Energy, "Voices of Experience: A Stakeholders Guide to Electrification - Customer Engagement and Electrification," April 4, 2024, available at <https://www.energy.gov/sites/default/files/2024-04/04-04-2024-oe-voe-customer-engagement-and-electrification.pdf>.

<sup>151</sup> Halton, C., "Diffusion of Innovations Theory: Definitions and Examples," *Investopedia*, May 2025, available at <https://www.investopedia.com/terms/d/diffusion-of-innovations-theory.asp>.

<sup>152</sup> On Digital Marketing, "The 5 Customer Segments of Technology Adoption," accessed July 2025, available at <https://ondigitalmarketing.com/learn/odm/foundations/5-customer-segments-technology-adoption/>.

<sup>153</sup> Farris, P. et al., "Marketing return on investment: Seeking clarity for concept and measurement," *Applied Marketing Analytics*, Vol. 1:3, 2015, available at <https://www.ingentaconnect.com/content/hsp/ama/2015/0000001/00000003/art00010>.

<sup>154</sup> *Ibid.*

<sup>155</sup> Daigle, C., American Council for an Energy-Efficient Economy, "Innovative Utility Strategies Expand Equitable Access to EV Charging," January 13, 2026, available at <https://www.aceee.org/blog-post/2026/01/innovative-utility-strategies-expand-equitable-access-ev-charging>.

<sup>156</sup> McKinsey & Company, "What is personalization?," May 30, 2023, available at <https://www.mckinsey.com/featured-insights/mckinsey-explainers/what-is-personalization>.

<sup>157</sup> Direct Testimony of Sophia Schuster on behalf of The Michigan Energy Innovation Business Council and Institute for Energy Innovation, Case No. U-21860, pp. 32-, available at <https://mipsc.my.site.com/sfc/servlet.shepherd/version/download/068cs000016pyuNAAQ>.

Michigan EIBC/United also emphasized that the success of the Company's E&O activities directly controls the efficiency of the TEP programs and services. Despite the evidence that E&O could have a significant impact on TEP program cost-efficiency and effectiveness, in its final Order in Case No. U-21860, the Commission indicated that TEP filing requirements, process issues, and design issues should be handled in a separate proceeding and "decline[d] to adopt changes to the currently-approved TEP in a rate case."<sup>158</sup>

As described in depth above, Michigan EIBC/United assume that the Commission meant to address these issues in the current docket. Without waiving concerns described above regarding the timeline of these proceedings, the Company could have addressed the expressed concerns regarding E&O in its current TEP filing. In other words, despite the timeline issues within one TEP/rate case cycle, these concerns regarding E&O have been clearly expressed by Michigan EIBC/United in a previous TEP and the Company had ample time to consider and make adjustments prior to the current TEP filing. However, Michigan EIBC/United are unaware of any such adjustments.

Given this, stakeholders are still unable to determine the following: 1) if and how the Company's advisory services are proactively reaching out to prospective fleet and MUD customers, 2) how much each E&O outreach method costs per customer, 3) what the ROI for each outreach method is, 4) what metrics the company is tracking to evaluate the success of each program activity, and 5) specifically how the Company intends to improve upon the program. This makes it nearly

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<sup>158</sup> Michigan Public Service Commission, Case No. U-21860, "Order: In the matter of the application of DTE Electric Company for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority," February 19, 2026, pp. 259-260, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001kHayeAAC>.

impossible for external stakeholders to offer meaningful and constructive feedback. Michigan EIBC/United continue to argue that programmatic issues which directly dictate the efficiency of ratepayer-funded services should be addressed in the rate case proceedings. However, if the Commission believes that these issues are best addressed in the current docket, then the Commission needs to address the timeline issues (as described above), and the Company needs to incorporate feedback from previous TEP cycles into its current and future TEPs.

### Recommendation

Michigan EIBC/United strongly recommend that, at minimum, the Company address previous comments made in the TEP docket (Case No. U-21538) or general electric rate cases regarding the TEP in future TEPs. Michigan EIBC/United also strongly urge the Company to convene a technical conference that would explore opportunities to improve its E&O programs. Such a convening could include the following: 1) an evaluation of current spending, 2) a discussion of the metrics by which the Company is evaluating the success of its E&O efforts, 3) a review of how peer utilities are proactively engaging with community partners and prospective customers, and 4) a discussion among key community partners and industry stakeholders about what could be done within the E&O program to improve TEP program efficiency and effectiveness. The Company should then incorporate learnings from the technical conference into its 2027 TEP Annual Progress Report and 2028 TEP filings to track progress related to its E&O efforts.

## **Charger Rebate Program Comments**

### *Residential Rebate Investment Proposal*

The Company proposes to spend \$23.3 million to support the installation of nearly 28,000 home chargers at low- (“LI”), middle- (“MI”), and non-LI households:<sup>159</sup>

- *LI rebates* – These rebates would cover the full cost of a Level 2 charger (up to \$2,000) plus the full cost of installation for 100 percent of the targeted LI household market share.<sup>160</sup> These rebates would be available to LI households with an income of up to 200 percent of the federal poverty limit (approximately \$64,000 for a four-person household). Eligibility requires proof of EV purchase or lease, as well as installation of an ENERGY STAR-certified or manufacturer-approved charger of at least 11.5 kW.<sup>161</sup>
- *MI rebates* – These rebates would cover up to \$1,500 of the cost of a Level 2 charger for 100 percent of the targeted MI household market share.<sup>162</sup> These rebates would be available to MI households with an income 201 percent to 400 percent of the federal poverty limit (approximately \$128,000 for a four-person household). Eligibility requires proof of EV purchase or lease, as well as installation of an ENERGY STAR-certified or manufacturer-approved charger of at least 11.5 kW.<sup>163</sup>
- *Non-LI rebates* – These rebates would cover up to \$500 of the cost of a Level 2 charger for 15 percent of the targeted non-LI household market share.<sup>164</sup> Eligibility requires proof

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<sup>159</sup> DTE Electric Company, Case No. U-21538, “2027-2031 Transportation Electrification Plan,” April 22, 2026, pp. 40-42, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

<sup>160</sup> *Id.*, p. 41.

<sup>161</sup> *Ibid.*

<sup>162</sup> *Ibid.*

<sup>163</sup> *Ibid.*

<sup>164</sup> *Ibid.*

of EV purchase or lease, as well as installation of an ENERGY STAR-certified or manufacturer-approved charger of at least 11.5 kW.<sup>165</sup>

Historically, the Company's residential segment has focused solely on offering charger rebates to LI households;<sup>166</sup> however, the Company notes that:

Through 2025, the program covered the full costs for 294 qualified customers out of the available funding for 1,421 rebates, with income exceeding the eligibility threshold identified as the primary driver for application rejection. This participation outcome represents an initial data point suggesting that the current income eligibility structure constrained program reach, with just under 16 percent of available funding reaching qualified participants.<sup>167</sup>

Consequently, and as suggested by the Company, expanding the residential charger rebate by allowing MI and non-LI residents to apply would likely improve program subscriptions and lead to a more efficient realization of the NPV projected in the Company's BCA.

### Recommendation

As detailed in previous testimony,<sup>168</sup> Michigan EIBC/United strongly support the Company's expansion of the residential program to include MI and non-LI customers whose income level exceeds 200 percent of the federal poverty limit. Not only will expanding the rebate eligibility ensure that funds allocated to the residential segment are deployed more efficiently, but it will also enable the Company's forecasted NPV benefits attributed to its TEP portfolio to be realized more readily.

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<sup>165</sup> *Ibid.*

<sup>166</sup> DTE Electric Company, "2025-2028 Transportation Electrification Plan," January 11, 2024, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/0688y00000BUT09AAH>.

<sup>167</sup> DTE Electric Company, Case No. U-21538, "2027-2031 Transportation Electrification Plan," April 22, 2026, p. 40, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

<sup>168</sup> Direct Testimony of Dr. Laura S. Sherman on behalf of The Michigan Energy Innovation Business Council and Institute for Energy Innovation, Case No. U-21534, p. 27, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/0688y00000EmMIXAA3>.

### *Multi-United Dwelling (“MUD”) Rebate Investment Proposal*

The Company indicates that approximately 32 percent of its customers reside in MUDs and that these customers will account for over 10 percent of the incremental chargers needed for this TEP period from 2027-2031.<sup>169</sup> However, lack of charging access is a primary obstacle that prevents many MUD households from switching to an EV. While access to public charging can partly alleviate this concern, this makes it difficult for MUD residents, who typically fall into lower income brackets,<sup>170</sup> to fully take advantage of the fuel savings benefits that EVs have to offer.<sup>171</sup> Furthermore, the realizable fuel cost savings for MUD customers heavily depends on their building’s meter configuration. While MUD customers on a separate meter can take service under a more favorable EV residential rate (D1.9), customers living in MUDs with a single master meter are often served under a small C&I rate (e.g., D3 or D4).<sup>172</sup> The latter are therefore disadvantaged in achieving equivalent fuel cost savings. Consequently, continued support for charging rebate programs is critical to ensure that there is an equitable deployment of EV chargers across the Company’s service territory. Unfortunately, MUD property owners face several unique dilemmas to install EV charging on premises for their residents, including:

- *Fact-finding to determine project feasibility and tenants’ needs* – It can be daunting for property owners to know where to turn for information about choosing the right

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<sup>169</sup> DTE Electric Company, Case No. U-21538, “2027-2031 Transportation Electrification Plan,” April 22, 2026, p. 43, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

<sup>170</sup> Belhaj, M., et al., Michigan State Housing Development Authority, “Michigan Statewide Housing Needs Assessment,” 2024, available at [https://c9737800-326f-4c8f-9fd8-3f266717d0f2.filesusr.com/ugd/9d463d\\_02fdfe4f619f4adf885a96677c710479.pdf](https://c9737800-326f-4c8f-9fd8-3f266717d0f2.filesusr.com/ugd/9d463d_02fdfe4f619f4adf885a96677c710479.pdf).

<sup>171</sup> Schuster, S., “Opinion | Michigan can’t control war-driven oil prices. We can control our transportation future,” *Bridge Michigan*, May 7, 2026, available at <https://bridgemi.com/guest-commentary/opinion-michigan-cant-control-war-driven-oil-prices-we-can-control-our-transportation-future/>.

<sup>172</sup> DTE Electric Company, “Rate Book for Electric Service,” May 6, 2026, accessed June 22, 2026, available at <https://www.dteenergy.com/content/dam/dteenergy/deg/website/common/service-and-price/rate-cards/DTEElectricRateBook.pdf>.

chargers, understanding the building’s electrical capacity, and deciding between business models.

- *Identifying and applying to appropriate funding* – Between local utility rebate programs and any state or local rebates programs targeting MUDs, knowing what funding they are eligible to apply for and how to apply for it can serve as a barrier for some property owners.
- *Facing higher costs* – Commercial-grade Level 2 chargers typically cost between \$1,000 to \$2,000 per charging port, but variables such as equipment costs, labor costs, network costs, permitting fees, and costs from electrical system and utility-side grid upgrades can lead to total project costs upwards of \$10,000 per port.<sup>173</sup>

<sup>174</sup> In fact, the Company reports an average installation cost of \$13,780 per port and points to significant site-specific variability.<sup>175</sup>

The Company reports that of the 154 rebate applications approved in 2025 for the LI sub-segment for MUD sub-segment, only 22 were issued, marking a less than 15 percent completion rate. For non-LI MUDs, of the 1,222 rebate applications approved, only 98 were issued, marking a less than 10 percent completion rate.<sup>176</sup> According to the Company, timing issues with EGLE’s CFCI grant program, which typically progressed within a five-month timeframe, and unexpected installation

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<sup>173</sup> Smart Columbus, “Smart Columbus Kickstarts EV Charging Deployments at Multi-Unit Dwellings: Case Study on Multi-Unit Dwelling Charging Infrastructure,” 2018, available at <https://d2rfd3nxvhmf29.cloudfront.net/legacy/uploadedfiles/playbook-assets/electric-vehicle-charging/mud-case-study-final.pdf>.

<sup>174</sup> Dunsy Energy and Climate Advisors, “Futureproofing Multifamily Buildings for EV Charging,” 2024, available at <https://media.fcm.ca/sites/GMF/resources/Report/futureproofing-multifamilybuildings-for-ev-charging.pdf>.

<sup>175</sup> DTE Electric Company, Case No. U-21538, “2027-2031 Transportation Electrification Plan,” April 22, 2026, p. 43, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

<sup>176</sup> *Id.*, pp. 44-45.

delays were the most commonly cited reasons for failing to implement an approved rebate application.<sup>177</sup>

To alleviate these burdens and ensure MUD residents and property owners have adequate access and support to install EV chargers, the Company proposes to spend \$58.4 million to support the installation of nearly 9,300 Level 2 chargers at LI, and non-LI MUD properties.<sup>178</sup> More specifically, it proposes the following changes to its MUD program to improve rebate subscription and alignment with state partners:

- *Reduce the kW output requirement for program eligibility* – The Company found when benchmarking with other utilities that no surveyed utilities mandate a minimum charger capacity of 11.5 kW for Level 2 chargers, and only one that requires a minimum of 9.6 kW for Level 2 chargers.<sup>179</sup> In response, DTE proposes to reduce the kW output requirement for program eligibility from 11.5 kW to 9.6 kW.
- *Maintain current rebate programs* – The Company proposes to maintain its existing \$14,400 per port LI MUD rebate and \$5,000 per port non-LI MUD rebate.<sup>180</sup> Targeting 100 percent of the LI MUD sub-segment, the former is designed to cover the full cost of installation at LI MUDs.<sup>181</sup> The Company is targeting to cover 42 percent of the non-LI MUD sub-segment.<sup>182</sup>
- *Align funding cycles* – The Company indicates that the EGLE CFCI grant funding cycle typically ran within a five-month timeframe. While it is unclear exactly what this means or

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<sup>177</sup> *Ibid.*

<sup>178</sup> *Id.*, p. 45.

<sup>179</sup> *Id.*, p. 26.

<sup>180</sup> *Id.*, p. 45.

<sup>181</sup> *Ibid.*

<sup>182</sup> *Ibid.*

what the Company proposes to do, DTE proposes to better align its MUD rebate funding cycles to mirror state grant funding cycles to ensure applications and installations move more efficiently.<sup>183</sup> Beyond funding cycle alignment, the Company should ensure that program design and execution are complementary, making it easier for participants.

- *Strengthen advisory services* – To ensure that property managers are equipped with the resources they need to identify charging needs, apply for funding, and install charging, the Company also proposes to strengthen their MUD advisory services.<sup>184</sup> However, it is unclear exactly how the Company proposes to accomplish this and what the targeted outcome for strengthening the program would be.

The Company asserts that these proposals will improve communication of accurate information to MUD property owners, better align the MUD rebates with existing grant programs, enable more ports to be installed on existing services, and broaden tenant access to EV charging.<sup>185</sup> While Michigan EIBC/United agree that these improvements could improve rebate program engagement, in addition to the existing MUD efforts, the Company could also consider:

- *Implementing complementary tenant guidance* – Program outreach is typically exclusive to building managers and property owners. However, tenants remain an important touchpoint to communicate building occupant interests. As such, it could be beneficial for the Company to have complementary resources available to tenants who want to approach their rental property management about EV charging.
- *Strengthening engagement with apartment and condominium associations* – According to its Annual Progress Report, the Company’s MUD advisory services worked to accelerate

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<sup>183</sup> *Ibid.*

<sup>184</sup> *Ibid.*

<sup>185</sup> *Id.*, pp. 45-46.

EV charging deployment in MUD settings through “stakeholder meetings” with three “supporting organizations” and 29 third party stakeholders in 2025.<sup>186</sup> While it is not clear who the “supporting organizations” or third party stakeholders are, apartment and condominium associations represent a critical stakeholder group that are not mentioned in the Company’s progress report. These organizations serve as centralized outreach opportunities to engage with a larger number and wider variety of property managers and owners. Therefore, coordination and education with them could likely improve the efficiency of the MUD advisory services and other MUD-specific E&O efforts.

### Recommendation

Michigan EIBC/United strongly support the Company’s proposed revisions to its MUD rebate program. Not only will expanding the rebate eligibility ensure that funds allocated to the MUD segment are deployed more efficiently, but it will also enable more equitable EV charging deployment across the Company’s service territory and improve communication with critical partners, such as property owners and state agencies.

However, Michigan EIBC/United recommend that the Company further elaborate exactly how it proposes to align its rebate timeline with state grant funding cycles and strengthen its MUD advisory services and deliver these improvements in the market. Additionally, it would be useful for stakeholders to understand how the Company intends to promote its MUD advisory services to improve engagement, what outcomes the Company hopes to achieve in strengthening its MUD

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<sup>186</sup> DTE Electric Company, “2025 Transportation Electrification Plan Annual Progress Report,” May 26, 2026, p. 22, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs000023eoEmAAI>.

advisory services, the metrics the Company is using to evaluate the success of its advisory services, and what costs are associated with these changes.

Finally, Michigan EIBC/United recommend that the Company propose a dedicated tariff or submetering rules for EV charging at master-metered MUD properties. With an appropriate rate in place that effectively encourages off-peak charging, property owners would be able to pass on equitable fuel cost savings to residents, ensuring EV drivers at MUD properties receive the same financial benefits as homeowners or renters with separate meters. The Company should convene an external stakeholder working group, bringing together charging providers, MUD property managers, and other industry experts, to discuss appropriate tariffs and incentive mechanisms that effectively balance increased EV adoption among MUD residents with the need to encourage off-peak charging.

#### *Public On-Route DCFC EV Charger Rebate Investment Proposal*

The Company reports that nearly 20 percent of the on-route public direct current fast charger (“DCFC”) rebate applications in disadvantaged communities (“DAC”) and 14 percent of the on-route public DCFC rebate applications in non-DACs were completed by the end of the year in 2025.<sup>187</sup> Over the course of the 2025-2028 TEP, the average installation costs for a DCFC station was roughly \$188,000.<sup>188</sup> For the 2027-2031 period, the Company proposes to spend \$43.8 million to support the deployment of 730 public charging rebates across its service territory, maintaining

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<sup>187</sup> DTE Electric Company, Case No. U-21538, “2027-2031 Transportation Electrification Plan,” April 2026, p. 47, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

<sup>188</sup> *Ibid.*

its tiered rebate structure, which offers \$70,000 per port for DAC and rural DCFC sites and \$50,000 per port for non-DAC, non-rural DCFC sites.<sup>189</sup>

### Recommendation

Given the critical role that public charging has in enabling equitable EV adoption,<sup>190, 191, 192, 193</sup> Michigan EIBC/United strongly support the Company's proposal to maintain its current public DCFC rebate program. The program's popularity also suggests that increasing the funding for the Public On-Route EV Charger Rebate Investment is appropriate. Michigan EIBC/United would strongly support the expansion of this rebate program to better align with existing customer demand.

### *Workplace and Retail EV Charger Rebate Investment Proposal*

The Company currently offers a rebate of \$2,500 per Level 2 port for between two to twenty ports, which must be maintained by the customer for at least five years with an uptime of at least 97 percent, and served by a separate dedicated meter.<sup>194</sup> Sites must also meet minimum lighting, public accessibility, and ADA compliance requirements where applicable.<sup>195</sup> The Company

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<sup>189</sup> *Id.*, p. 48.

<sup>190</sup> Osaka, S., The Washington Post, "For each public charger, here's how many EVs are looking to plug in," May 2024, available at <https://www.washingtonpost.com/climate-solutions/2024/05/20/charging-stations-lag-ev-sales/>.

<sup>191</sup> Center for Sustainable Energy, "The State of Electric Vehicle Adoption in the U.S. and the Role of Incentives in Market Transformation," September 2023, available at <https://energycenter.org/thought-leadership/blog/stateelectric-vehicle-adoption-us-and-role-incentivesmarket#:~:text=Publicly%20available%20EV%20charging%20inspires,apartments%2C%20to%20charge%20an%20EV.>

<sup>192</sup> U.S. Department of Energy, Alternative Fuels Data Center, "Charging Electric Vehicles in Public," June 2024, available at <https://afdc.energy.gov/fuels/electricity-charging-public>.

<sup>193</sup> International Energy Agency, "Global EV Outlook 2024: Moving towards increased affordability," 2024, available at <https://iea.blob.core.windows.net/assets/a9e3544b-0b12-4e15-b407-65f5c8ce1b5f/GlobalEVOutlook2024.pdf>.

<sup>194</sup> DTE Electric Company, Case No. U-21538, "2027-2031 Transportation Electrification Plan," April 2026, p. 50, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

<sup>195</sup> *Ibid.*

reports that of the 67 approved ports, only 4 have been installed, and finds that installation costs average \$12,000 and range between \$2,000 and \$19,350 per site.<sup>196</sup> While not explicitly stated, this variability in cost is likely driven by the number of ports being installed and the unique service upgrades required to support them. The Company notes that several prospective applicants suggested that the current rebate amount is insufficient to offset installation costs.<sup>197</sup>

In its 2027-2031 TEP, DTE proposes to spend \$4.2 million to support the deployment of 1,125 Level 2 chargers in the workplace or retail space across its service territory.<sup>198</sup> To support this deployment, the Company recommends the following revisions to its Workplace and Retail EV Charger rebate program:

- *Remove the minimum kW requirement* – When benchmarking with 13 other utilities, DTE found other major utilities had largely moved away from stringent kW requirements to allow their customers more flexibility.<sup>199</sup> In fact, the Company reports that only two had minimum charger output requirements for their public or workplace Level 2 charging programs.<sup>200</sup>
- *Increase the rebate amount* – The Company also proposes to increase its rebate amount from \$2,500 to \$3,750 per port.<sup>201</sup> It bases this recommendation on feedback from prospective applicants as well as benchmarking with other utilities, which indicated that more Level 2 workplace and retail charger rebates are focused on offering higher flat per-port rebates that cover a larger portion of make-ready costs without a kW minimum

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<sup>196</sup> *Ibid.*

<sup>197</sup> *Ibid.*

<sup>198</sup> *Id.*, p. 51.

<sup>199</sup> *Id.*, p. 50.

<sup>200</sup> *Ibid.*

<sup>201</sup> *Id.*, pp. 50-51.

requirement.<sup>202</sup> In fact, DTE points to Illinois' ComEd, which offers a Level 2 make-ready rebate of \$5,000 per port in non-DAC and \$7,500 per port in DAC areas.<sup>203, 204</sup>

### Recommendation

Michigan EIBC/United strongly support the proposed revisions to expand the workplace and retail EV charger rebate program accessibility by eliminating the kW output requirement and increasing the rebate amount. In fact, to better align this program with similar national utility programs, Michigan EIBC/United urge the Company to consider further increasing the rebate and establishing a tiered rebate structure for workplace and retail sites in DAC and non-DAC areas.

### *Fleet Rebate Investment Proposal*

Fleet EV charger rebates are divided among four major sub-segments: DCFC for school buses and transit buses, as well as DCFC and Level 2 charger rebates for other private and commercial fleets.<sup>205</sup> By the end of the 2025, of the 146 approved Level 2 fleet rebates, 115 installations were completed, marking a roughly 79 percent completion rate.<sup>206</sup> The DCFC rebate for other fleets, which could include municipal, county, state, or commercial fleets, saw a 100 percent completion rate.<sup>207</sup> The Company suggests that the strong subscription to both of these sub-segments is indicative of continued needed support for fleets.<sup>208</sup> Furthermore, while the federal and state

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<sup>202</sup> *Id.*, p. 50.

<sup>203</sup> *Ibid.*

<sup>204</sup> Commonwealth Edison, "Beneficial Electrification Plan 2, 2026-2028," July 2024, p. 43, available at <https://icc.illinois.gov/docket/P2024-0484/documents/366102/files/641295.pdf#PAGE=43>.

<sup>205</sup> DTE Electric Company, Case No. U-21538, "2027-2031 Transportation Electrification Plan," April 2026, p. 53, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

<sup>206</sup> *Id.*, p. 52.

<sup>207</sup> *Ibid.*

<sup>208</sup> *Ibid.*

funding landscape has shifted, applications for DCFC to support school buses still saw a 20 percent installation completion rate.<sup>209</sup> Unfortunately, the Company did not receive any DCFC public transit rebate applications in 2025. Across the fleet sub-segments, prospective applicants, customers, and participants in the Company's stakeholder engagement process pointed to rising installation costs and make-ready costs as persistent roadblocks to fleet electrification.<sup>210</sup>

To address these concerns, DTE proposes to spend \$6.2 million to support the deployment of 785 fleet rebates across its service territory.<sup>211</sup> The Company plans to support 45 DCFC rebates for the transit and school bus sub-segment, 10 DCFC rebates for the other fleet subsegment, and 730 Level 2 rebates across the fleet sub-segment.<sup>212</sup> The Company proposes the following revisions to its 2027-2031 TEP:

- *Increase the DCFC rebate amount per kW output tier for school buses* – While the Company seeks to maintain the tiered structure of its school bus DCFC fleet rebate program, it recommends an adjusted rebate amount for each tier.<sup>213</sup> The Company suggests increasing DCFC with a 24 kW output capacity from \$12,000 to \$17,000, 50 kW output capacity from \$18,000 to \$26,000, 62.5 kW capacity from \$25,000 to \$36,000, 100 kW output capacity from \$30,000 to \$46,000, and 150 kW output capacity from \$70,000 to \$100,000.<sup>214</sup>

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<sup>209</sup> *Id.*, p. 51.

<sup>210</sup> *Ibid.*

<sup>211</sup> *Id.*, p. 53.

<sup>212</sup> *Ibid.*

<sup>213</sup> *Id.*, p. 52.

<sup>214</sup> *Ibid.*

- *Increase the DCFC rebate amount for transit buses* – The Company proposes to increase the DCFC rebate amount for transit buses from \$70,000 to \$100,000.<sup>215</sup>
- *Increase the Level 2 rebate for other private and commercial fleets* – The Company proposes to increase the Level 2 rebate amount for other fleets from \$2,500 to \$5,000 per port.<sup>216</sup>

DTE hopes that these adjustments will address customer concerns over increased costs and the loss of critical federal and state funding streams.<sup>217</sup>

While the Company points to several challenges in federal and state funding availability that could slow momentum for increased fleet electrification, it is equally important to point to improved funding opportunities expected to become available by the end of 2026, as well as new market forces, that could result improve the total cost of ownership for fleet vehicles. For example:

- *New state funding opportunities* – The final tranche of EGLE’s CFCI grant program, which will offer grants to support fleet charging, is expected by the end of the year.<sup>218</sup> Furthermore, on May 19, 2026, EGLE announced the launch of a \$28 million RFP within its Fuel Transformation Program (“FTP”).<sup>219</sup> Funded through the Volkswagen Environmental Mitigation Trust, the FTP will prioritize projects that significantly reduce

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<sup>215</sup> *Id.*, p. 53.

<sup>216</sup> *Ibid.*

<sup>217</sup> *Id.*, p. 52.

<sup>218</sup> Department of Environment, Great Lakes, and Energy, “Clean Fuel and Charging Infrastructure Program,” accessed June 10, 2026, available at <https://www.michigan.gov/egle/about/organization/materials-management/energy/rfps-loans/clean-fuel-and-charging-infrastructure-program>.

<sup>219</sup> Department of Environment, Great Lakes, and Energy, “Fuel Transformation Program,” accessed June 10, 2026, available at <https://www.michigan.gov/egle/about/organization/materials-management/fuel-transformation-program>.

emissions from gas- and diesel-powered vehicles and accelerate the adoption of zero-emission vehicles, like EVs.<sup>220</sup> Individual awards will range from \$50,000 to \$5 million.<sup>221</sup>

- *New Heavy-Duty EV models coming on the market* – As previously described above, in March 2026, Tesla opened its first electric semi-truck factory in Nevada, which is expected to greatly increase the availability of new heavy-duty EV models. These factors, coupled with the ongoing war in Iran driving up fuel costs, could have a positive effect on the total cost of ownership analysis for electrified fleet vehicles.<sup>222, 223</sup> As such, it is reasonable to expect increased electrification across the commercial sector, especially among heavy-duty fleet operators.

### Recommendation

Michigan EIBC/United support the Company’s proposed revisions to its fleet EV charger rebate programs. These adjustments will alleviate burdens associated with fleet electrification, such as higher installation costs and the loss of critical federal and state funding streams. Furthermore, the flexibility in eligible applicants allows for entry of more prospective customers. However, recognizing that anticipated funding streams and new market forces could have a balancing effect on fleet electrification in the Company’s service territory, Michigan EIBC/United caution DTE from being overly conservative in its rebate forecasts for the 2027-2031 TEP. This reinforces the

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<sup>220</sup> Department of Environment, Great Lakes, and Energy, “EGLE announces up to \$28 million in grants to reduce diesel emissions, advance clean energy tech,” May 19, 2026, available at <https://content.govdelivery.com/accounts/MIDEQ/bulletins/417f214>.

<sup>221</sup> *Ibid.*

<sup>222</sup> *Ibid.*

<sup>223</sup> Schuster, S., “Opinion | Michigan can’t control war-driven oil prices. We can control our transportation future,” *Bridge Michigan*, May 7, 2026, available at <https://bridgemi.com/guest-commentary/opinion-michigan-cant-control-war-driven-oil-prices-we-can-control-our-transportation-future/>.

importance, as described above, of establishing reasonable guardrails that allow a degree of flexibility to reallocate approved funding from one rebate program to another.

### **Pilot Program Comments**

#### *Managed Charging Pilot*

The Company recognizes that effective managed charging programs represent a critical opportunity to maximize grid utilization while reducing costs associated with increased EV load by shifting EV charging load away from high cost, on-peak hours.<sup>224</sup> DTE’s managed charging portfolio combines passive managed charging (primarily through time-of-day (“TOD”) rates and customer education) with active managed charging programs that directly influence charging schedules through telematics and smart-charging platforms.<sup>225</sup> Because the Company converted all residential customers to a TOD rate in 2023, passive managed charging was naturally embedded into EV customer bills before the first TEP was filed in 2024.<sup>226</sup> The Company offers five TOD rates from which customers can choose and reports that in 2024, 92 percent of EV charging occurred outside the peak hours of 3pm - 7pm.<sup>227</sup> The TEP highlights two passive managed charging approaches that it studied between 2020-2023:

- *EV Data Sharing Pilot with WeaveGrid* – Using vehicle telematics from 610 EV drivers to evaluate the EV customers’ charging behaviors across each TOD segment, the Company found that customers overwhelmingly charged during off-peak hours regardless of pilot participation status.<sup>228</sup>

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<sup>224</sup> DTE Electric Company, Case No. U-21538, “2027-2031 Transportation Electrification Plan,” April 2026, p. 59, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

<sup>225</sup> *Id.*, p. 60.

<sup>226</sup> *Ibid.*

<sup>227</sup> *Ibid.*

<sup>228</sup> *Id.*, p. 61.

- *Bring Your Own Charging (“BYOC”) Pilot with Sagewell* – From 2020-2022, the BYOC pilot enrolled more than 510 residential customers in TOD rates and, using Sagewell SageSight’s advanced meter analytics and the EV Identification Model algorithm to identify positive EV charging behavior, rewarded customers \$24 per quarter for charging outside peak periods.<sup>229</sup> The pilot achieved 96 percent off-peak charging.<sup>230</sup> While the pilot successfully demonstrated that incentives and analytics could influence customer behavior, the Company opted to shift all residential customers to a TOD rate, which it determined would be more cost-effective.<sup>231</sup>

The Company also points to Smart Charge, its active managed charging pilot, which it runs with two charging management technology partners, ChargeScape and WeaveGrid.<sup>232</sup> In addition to routine load shifting, the program can dispatch demand response events during periods of high system demand, temporarily delaying or reducing charging while ensuring vehicles reach customer-selected state-of-charge targets by their desired departure times. By mid-2025, Smart Charge had enrolled more than 2,700 participants - 1,400 through ChargeScape and over 1,300 through WeaveGrid – and consistently achieved approximately 93 percent off-peak charging.<sup>233</sup> Current customers are rewarded \$5 per month for participation.<sup>234</sup> The Company reports that despite the successful shift of EV charging to off-peak hours, there was only a 10 percent demand response event participation rate to a single called event across enrolled ChargeScape customers,

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<sup>229</sup> *Ibid.*

<sup>230</sup> *Ibid.*

<sup>231</sup> *Ibid.*

<sup>232</sup> *Id.*, pp. 61-65.

<sup>233</sup> *Id.*, pp. 62-63.

<sup>234</sup> *Id.*, p. 62.

avoiding just 989 kWh of energy, in 2025.<sup>235</sup> The total Smart Charge program costs amounted to \$931,087 in 2025.<sup>236</sup> Despite recommendations from its stakeholder engagement process in Q4 2025 encouraging the Company to tie the non-LI residential rebate to Smart Charge program enrollment, DTE plans to rely solely on its E&O to reinforce the importance and benefits of off-peak charging.<sup>237</sup> DTE reports that it will evaluate the future role of any active managed charging program within its residential offerings, especially its non-LI offering, in future TEP filings or other Commission approved proceedings.<sup>238</sup> To address challenges with Smart Charge customer participation, the Company notes that it is developing a more flexible customer-centric platform.<sup>239</sup>

Given that very few (one) demand response events have been called, the merits of the Smart Charge program cannot be comprehensively assessed. In fact, a recent report from the Smart Electric Power Alliance and Vehicle-Grid Integration Council (“VGIC”) notes that small demonstrations cannot adequately capture peak impacts or customer behavior to inform the cost effectiveness of future scales projects.<sup>240</sup> As such, it would be useful to study several events under various conditions. This would allow the Company to better understand the value of the pilot and the most impactful customer engagement methods to maximize participation, creating a stronger evidence base for long-term program integration. Active managed charging represents a significant opportunity to capitalize on all the benefits that EVs have to offer, and pilots across the country

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<sup>235</sup> *Id.*, pp. 63-64.

<sup>236</sup> *Id.*, p. 64.

<sup>237</sup> *Id.*, p. 67.

<sup>238</sup> *Ibid.*

<sup>239</sup> *Id.*, p. 65.

<sup>240</sup> Smart Electric Power Alliance and the Vehicle-Grid Integration Council, “Valuing Vehicle-Grid Integration Programs: A Tool for Improving Energy Affordability through EV Grid Services,” May 2026, available at <https://static1.squarespace.com/static/5dcde7af8ed96b403d8aeb70/t/6a171cb1842cf378953b310a/1779899582477/S-EPA324VGICVehicleGridIntegrationProgramsReportFinal.pdf>.

have shown great promise. For example, according to a 2026 study by the Brattle Group, an evaluation of an active managed charging program in the State of Washington showed that active management can “[improve] utilization of the existing grid in EV adoption hotspots and reduces distribution grid costs by up to \$230 per EV per year in the long run,”<sup>241</sup> and even “allow distribution grid assets to host 1.3 to 3.2 times more EVs.”<sup>242</sup> Depending on the existing grid conditions, this could defer grid upgrades by up to 10 years even in areas facing existing EV-related capacity constraints.<sup>243</sup>

### Recommendation

Michigan EIBC/United recommend that the Company continue to explore opportunities to improve its active managed charging efforts based on the learnings from the Smart Charge pilot. With several managed charging and V2G pilot programs being implemented across the country, there is a wealth of resources, such as from industry experts and peer utilities, to tap into for aiding the development of a stronger pilot. Michigan EIBC/United suggest that the Company host a stakeholder engagement event to evaluate the future of the Smart Charge pilot or the development of an active managed charging successor. Subsequently, the Company should present learnings from this stakeholder engagement event and its experience with the Smart Charge program in the 2027 TEP Refresh.

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<sup>241</sup> The Brattle Group, “Demonstrating the Full Value of Managed Electric Vehicle Charging: Based on a Real-World Trial of EnergyHub’s EV Solution,” January 2026, p. 8. available at <https://www.brattle.com/wp-content/uploads/2026/01/Demonstrating-the-Full-Value-of-Managed-Electric-Vehicle-Charging-1.pdf>.

<sup>242</sup> *Id.*, p. 7.

<sup>243</sup> *Ibid.*

### *Vehicle-to-Grid (“V2G”) Pilot*

In anticipation of the development of more advanced grid-integration features from major U.S. automakers, such as bidirectional charging, the Company also built upon the vehicle-to-home (“V2H”) pilot that it launched with Ford Motor Company in December 2025 by adding General Motors (“GM”) employees in May 2026.<sup>244</sup> The V2H pilot, which was an Emerging Technology Fund award recipient in 2024, is set to run through 2026.<sup>245</sup>

The Company’s School Bus Chargers pilot seeks to advance V2G readiness by installing V2G-ready EV chargers that meets specific bidirectional interconnection standards.<sup>246</sup> In 2024, one participating school district successfully installed V2G chargers and is nearing completion of the interconnection process, while the other three schools returned to standard one-way charging solutions.<sup>247</sup> The Company identified several challenges from managing the pilot, including limited school staff capacity, interconnection barriers, high equipment and installation costs, and a lack of available V2G-ready charger options.<sup>248</sup> Based on these findings, the Company plans to test bidirectional energy flow between electric vehicles and the grid with the one school that is actively preparing for V2G operations and will continue offering fleet rebates for V2G chargers.<sup>249</sup>

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<sup>244</sup> DTE Electric Company, Case No. U-21538, “2027-2031 Transportation Electrification Plan,” April 2026, p. 66, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

<sup>245</sup> *Ibid.*

<sup>246</sup> *Id.*, p. 68

<sup>247</sup> *Ibid.*

<sup>248</sup> *Ibid.*

<sup>249</sup> *Ibid.*

While Michigan EIBC/United recognize the difficulties the Company has faced, newer technological development and availability may alleviate some of those existing constraints to improve the Company's experience. Such factors include, but are not limited to:

- *A larger number of school districts with electric school buses (ESB)* – Since 2024, Michigan Department of Education has awarded over \$125 million to deploy 322 electric school buses across 100 Michigan school districts.<sup>250, 251</sup> For example, in January 2024, Pontiac School District allocated \$15.65 million in federal grant funding to the purchase of 40 ESBs, with chargers covered by the Company's Charging Forward program.<sup>252</sup> In April 2025, Dearborn Public Schools announced it was adding 18 new ESBs to its fleet.<sup>253</sup> In fact, according to the Environmental Law and Policy Center, of the over 580 state- and federally-funded buses awarded in Michigan, at least 250 across 33 school districts are or will be deployed in the Company's electric service territory.<sup>254</sup> The sheer volume of buses points to clear partnership opportunities beyond the four school districts originally enrolled in the Company's pilot. Moreover, these school districts represent a diverse range of communities, which would allow the Company to further test V2G under a variety of geographic and demographic circumstances.

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<sup>250</sup> Michigan Department of Education, "More Than Two Dozen School Districts Get Clean Bus Energy Grants," February 27, 2026, available at <https://www.michigan.gov/mde/news-and-information/press-releases/2026/02/27/clean-bus-energy-grants>.

<sup>251</sup> Electrification Coalition, "Charged Up and On Time: How Michigan Disbursed Over \$100 Million for Electric School Buses in Under Two Years," April 7, 2026, available at <https://electrificationcoalition.org/resource/charged-up-and-on-time-how-michigan-disbursed-over-100-million-for-electric-school-buses-in-under-two-years/>.

<sup>252</sup> Fahr, M., "Pontiac, Mich., Schools Buy 40 Electric Buses," *GovTech.com*, January 25, 2024, available at <https://www.govtech.com/education/k-12/pontiac-mich-schools-buy-40-electric-buses>.

<sup>253</sup> School Bus Fleet Magazine, "Michigan District Adds 18 New Electric School Buses," April 28, 2025, available at <https://www.schoolbusfleet.com/news/michigan-district-adds-18-new-electric-school-buses>.

<sup>254</sup> Environmental Law and Policy Center, "Michigan Electric School Buses," March 9, 2026, accessed June 24, 2026.

- *A larger number of V2G chargers on the market* – While the Company’s reference to setbacks with a single V2G charging brand has merit,<sup>255</sup> the growing list of V2G chargers and fleet management services reaching the market in the United States suggests a wider variety of offerings available for schools and the Company to choose from.<sup>256, 257, 258, 259, 260, 261</sup> Moving forward, this should mitigate the noted limited optionality concerns.
- *A variety of service providers to manage old or abandoned chargers* – Several businesses service abandoned and legacy EV charging equipment.<sup>262, 263</sup> As such, the Company and remaining participating school district have options to continue operating the existing chargers deployed, regardless of the original manufacturer.

Despite the challenges cited by the Company, enabling grid-parallel V2G represents a critical opportunity for utilities and their customers to fully leverage bidirectional EV technology. For EV owners who opt-in to provide power during times of grid constraint, EVs with bidirectional

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<sup>255</sup> DTE Electric Company, Case No. U-21538, “2027-2031 Transportation Electrification Plan,” April 2026, p. 68, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

<sup>256</sup> Dnistran, I., “Heliox’s New DC Fast Charger Can Send Power Back To The Grid,” *InsideEVs*, November 11, 2025, available at <https://insideevs.com/news/778565/heliox-dc-fast-charger-v2g-america/>.

<sup>257</sup> Morris, C., “San Francisco Unified School District to deploy 104 electric school buses with bidirectional charging,” *ChargedEVs*, May 28, 2026, available at <https://chargedevs.com/newswire/san-francisco-unified-school-district-to-deploy-104-electric-school-buses-with-bidirectional-charging/>.

<sup>258</sup> Huggett, A., “The New Era of Electric School Buses: V2G, Bidirectional Chargers & More,” *School Bus Fleet Magazine*, May 15, 2026, available at <https://www.schoolbusfleet.com/videos/the-new-era-of-electric-school-buses-v2g-bidirectional-chargers-more>.

<sup>259</sup> Mattalian, S., “Illinois Utility Pilots Vehicle-to-Grid Program with Electric School Buses,” *Inside Climate News*, October 3, 2025, available at <https://insideclimatenews.org/news/03102025/illinois-electric-school-bus-vehicle-to-grid-program/>.

<sup>260</sup> Martucci, B., “Massachusetts to deploy 100 bidirectional EV chargers in first-of-its-kind ‘V2X’ pilot,” *Utility Dive*, March 4, 2025, available at <https://www.utilitydive.com/news/massachusetts-bidirectional-ev-chargers-v2g-v2x/741525/>.

<sup>261</sup> Marsh, J., “What is V2G? A Guide to Vehicle-to-Grid Technology,” *Emporia*, January 29, 2026, available at <https://www.emporiaenergy.com/blog/what-is-v2g/>.

<sup>262</sup> Lovrak, T., “Alta eMobility to service, distribute BorgWarner DC fast chargers,” *Fleet Equipment Magazine*, January 20, 2023, available at <https://www.fleetequipmentmag.com/alta-emobility-borgwarner-chargers/>.

<sup>263</sup> Lewis, M., “Broken EV chargers? This program replaces them for free,” *Electrek*, April 6, 2026, available at <https://electrek.co/2026/04/06/broken-ev-chargers-this-program-replaces-them-for-free/>.

charging features can not only help reduce the impact of grid power outages for those EV owners and their communities, but they can also offer significant cost savings for all ratepayers. For example, the Massachusetts Clean Energy Center (“MassachusettsCEC”) reports that the state’s ConnectedSolutions virtual power plant through National Grid allows certain light-duty bidirectional EVs to earn roughly \$3,000 per summer.<sup>264, 265</sup> MassachusettsCEC also indicates that school districts have the opportunity to earn up to \$12,000 per bidirectional electric bus per summer.<sup>266</sup> In fact, a study by Converge Strategies and the VGIC indicates that a single school bus in Beverly, Massachusetts discharged 10.78 MWh to National Grid’s electric system and generated \$23,500 in revenue over two summers.<sup>267, 268</sup>

Bidirectional EVs not only help save EV owners money, but they also have the capacity to aid grid-operators in balancing grid conditions, therefore maximizing grid utilization, particularly during times of grid constraint, and potentially delaying grid upgrades.<sup>269</sup> According to a study by the Electric Power Research Institute, California’s goal of 5 million EVs on the road by 2030 could translate to \$1 billion in annual benefits to the electric grid.<sup>270</sup> Furthermore, an Ernst & Young

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<sup>264</sup> Martucci, B., “Massachusetts ‘vehicle-to-everything’ demonstration hints at EV batteries’ grid potential,” *Utility Dive*, June 2, 2026, available at <https://www.utilitydive.com/news/massachusetts-vehicle-to-everything-demonstration-hints-at-ev-batteries/821621/>.

<sup>265</sup> The Mobility House, “Resource Innovations and The Mobility House Tapped to Lead Massachusetts Statewide Vehicle-to-Everything (V2X) Demonstration Program,” February 25, 2026, available at [https://www.mobilityhouse.com/int\\_en/our-company/newsroom/article/resource-innovation-the-mobility-house-v2x](https://www.mobilityhouse.com/int_en/our-company/newsroom/article/resource-innovation-the-mobility-house-v2x).

<sup>266</sup> Martucci, B., “Massachusetts ‘vehicle-to-everything’ demonstration hints at EV batteries’ grid potential,” *Utility Dive*, June 2, 2026, available at <https://www.utilitydive.com/news/massachusetts-vehicle-to-everything-demonstration-hints-at-ev-batteries/821621/>.

<sup>267</sup> *Ibid.*

<sup>268</sup> Converge Strategies and Vehicle-Grid Integration Council, “Vehicle-to-Everything Research Report,” March 2026, available at [https://www.masscec.com/sites/default/files/documents/v2x-research-report\\_masscec-v2x-demonstration-program.pdf](https://www.masscec.com/sites/default/files/documents/v2x-research-report_masscec-v2x-demonstration-program.pdf).

<sup>269</sup> The Institute for Energy Innovation, “Transportation Electrification in Michigan: A Roadmap of State Policy Actions,” October 2024, available at <https://www.mieibc.org/wp-content/uploads/2024/10/Transportation-Electrification-in-Michigan.pdf>.

<sup>270</sup> Electric Power Research Institute, “Vehicle-to-Grid: \$1 Billion in Annual Grid Benefits?,” EPRI Journal, 2019, available at <https://eprijournal.com/vehicle-to-grid-1-billion-in-annual-grid-benefits/>.

report indicates that with the right smart charging and V2G policies and programs in place, EVs could contribute 4 percent of Europe’s annual power supply, which is enough to power 30 million homes per year and drive 4 billion Euros in annual savings to European utilities.<sup>271</sup> These examples clearly illustrate the value that EVs offer to EV drivers, local communities, and grid operators alike.

Fortunately, more programs similar to National Grid’s are taking shape across the country. For example:

- *Maryland* – In 2024, Sunrun and Baltimore Gas and Electric launched a V2G pilot program to with several Ford F-150 Lightning vehicles.<sup>272, 273</sup>
- *California* – Following California’s 2020 blackouts, the California Public Utilities Commission rolled out an emergency reliability offering that offered EV drivers \$2/kWh in load reduction for participating in demand response events during critical grid emergencies.<sup>274</sup> This was developed in conjunction with the California Energy Commission’s Replicable V2X Deployment for Schools program, which offered funding to four California public schools to install bidirectional EV charging systems.<sup>275</sup>

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<sup>271</sup> Sankaran, A., Ernst & Young, “Smart-charging and V2G critical for cost savings, grid stability and renewables integration,” March 5, 2025, available at [https://www.ey.com/en\\_gl/newsroom/2025/03/smart-charging-and-v2g-critical-for-cost-savings-grid-stability-and-renewables-integration](https://www.ey.com/en_gl/newsroom/2025/03/smart-charging-and-v2g-critical-for-cost-savings-grid-stability-and-renewables-integration).

<sup>272</sup> Converge Strategies and Vehicle-Grid Integration Council, “Vehicle-to-Everything Research Report,” March 2026, p. 19, available at [https://www.masscec.com/sites/default/files/documents/v2x-research-report\\_masscec-v2x-demonstration-program.pdf](https://www.masscec.com/sites/default/files/documents/v2x-research-report_masscec-v2x-demonstration-program.pdf).

<sup>273</sup> Walton, R., “Sunrun, BGE launch first US electric vehicle-to-home virtual power plant,” *Utility Dive*, July 25, 2024, available at <https://www.utilitydive.com/news/sunrun-bge-launch-first-us-vehicle-to-home-ev-charging-program/722367/>.

<sup>274</sup> Converge Strategies and Vehicle-Grid Integration Council, “Vehicle-to-Everything Research Report,” March 2026, p. 24, available at [https://www.masscec.com/sites/default/files/documents/v2x-research-report\\_masscec-v2x-demonstration-program.pdf](https://www.masscec.com/sites/default/files/documents/v2x-research-report_masscec-v2x-demonstration-program.pdf).

<sup>275</sup> *Id.*, p. 23.

- *Midwest and Southeast United States* – In 2020, the North Carolina Utilities Commissions approved a V2G pilot program for up to 30 ESBs in Duke Energy’s electric service territory.<sup>276</sup> In 2022, Duke Energy also announced a demand response pilot for Ford F-150 Lightning lessees, in which drivers could reduce their lease payments in return for allowing their bidirectional EVs to serve energy back to the grid.<sup>277</sup>

As stated above, however, meaningful learnings are driven by larger vehicle-grid integration demonstrations,<sup>278</sup> and America’s automakers are ready to participate in scaled V2G programs to support the nation’s grid facing increasing constraints. For example, on June 9, 2026, GM announced that it would integrate bidirectional features as a foundational standard across its EV portfolio and even activate the technology for existing customers without the need for any hardware upgrades.<sup>279, 280</sup> GM also issued an “open letter” to the nation’s utilities urging them to streamline interconnection, redesign rate structures, and allow EVs to serve as distributed energy

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<sup>276</sup> Bolin, J., “Early Lessons Learned from Duke Energy’s Electric School Bus Pilot,” *Advanced Energy*, May 19, 2025, available at <https://www.advancedenergy.org/news/early-lessons-learned-from-duke-energys-electric-school-bus-pilot>.

<sup>277</sup> Morris, C., “Duke Energy to use Ford F-150 Lightning electric trucks in V2G pilot,” *Charged EVs*, September 16, 2022, available at <https://chargedevs.com/newswire/duke-energy-to-use-ford-f-150-lightning-electric-trucks-in-v2g-pilot/>.

<sup>278</sup> Smart Electric Power Alliance and the Vehicle-Grid Integration Council, “Valuing Vehicle-Grid Integration Programs: A Tool for Improving Energy Affordability through EV Grid Services,” May 2026, available at <https://static1.squarespace.com/static/5dcde7af8ed96b403d8aeb70/t/6a171cb1842cf378953b310a/1779899582477/S-EPA324VGICVehicleGridIntegrationProgramsReportFinal.pdf>.

<sup>279</sup> GM News, “GM Empower 2026: Scaling the future of electrification, batteries, and energy,” June 9, 2026, available at <https://news.gm.com/home.detail.html/Pages/news/us/en/2026/jun/0609-electrification-batteries-energy.html>.

<sup>280</sup> Fosse, P., “GM Activates Vehicle To Grid (V2G) Capability For Existing Customers, With No New Hardware Required,” *CleanTechnica*, June 10, 2026, available at <https://cleantechnica.com/2026/06/09/gm-activates-vehicle-to-grid-v2g-capability-for-existing-customers-with-no-new-hardware-required/>.

resources for desperately needed grid support.<sup>281, 282, 283, 284</sup> The next week, Rivian announced a new partnership with ChargeScape to support nationwide bidirectional charging programs.<sup>285, 286</sup> Not only do announcements and calls to action like those from GM and Rivian indicate that the automotive industry is eagerly embracing this technology, but the utility pilots and commitment from public utility commissions across the country clearly suggest that other programs are launching successfully and more broadly. Thus, the Company should be encouraged and motivated to continue working with key stakeholders to develop impactful V2G pilots that offer scalable growth opportunities across the state.

### Recommendation

Michigan EIBC/United recommend the Company continue its work with the one school district remaining in its School Bus Chargers pilot and provide a more detailed report of the Company's learnings, as well as a thorough benchmarking of other state's V2G pilots and programs, in its 2027 Annual Progress Report. Furthermore, this report should also include a discussion of (1) what specifically the Company seeks to learn from existing and future pilots, (2) how the existing pilot(s) would support the pursuit of a more scalable long-term program for all DTE customers

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<sup>281</sup> GM News, "Bidirectional EVs are here. Let's invest in them together.," June 9, 2026, available at <https://news.gm.com/home.detail.html/Pages/news/us/en/2026/jun/0609-bidirectional-evs.html>.

<sup>282</sup> Martucci, B., "Managed, bidirectional EV charging advances with utility, automaker support," *Utility Dive*, June 17, 2026, available at <https://www.utilitydive.com/news/managed-bidirectional-ev-charging-advances-with-utility-automaker-support/823171/>.

<sup>283</sup> Lichtenberg, N., "America's grid is reeling. General Motors offers itself as a distributed utility in disguise," *Fortune*, June 9, 2026, available at <https://fortune.com/2026/06/09/general-motors-utility-in-disguise-sodium-ion-batteries/>.

<sup>284</sup> Lee, L., "GM wants your EV to help power the grid," *Yahoo! Finance*, June 9, 2026, available at <https://finance.yahoo.com/sectors/energy/articles/gm-wants-ev-help-power-213915542.html>.

<sup>285</sup> Martucci, B., "Managed, bidirectional EV charging advances with utility, automaker support," *Utility Dive*, June 17, 2026, available at <https://www.utilitydive.com/news/managed-bidirectional-ev-charging-advances-with-utility-automaker-support/823171/>.

<sup>286</sup> Binns, T., "Rivian and ChargeScape to partner on bidirectional charging and V2G," *Electric Drives*, June 16, 2026, available at <https://electricdrives.tv/rivian-and-chargescape-to-partner-on-bidirectional-charging-and-v2g/>.

and customer segments, and (3) possible export compensation mechanisms for customers that could be implemented under various scale conditions. Michigan EIBC/United also recommend the Company host a series of stakeholder meetings to inform improvements to future pilots and identify potential target customer segments (e.g. school districts, transit agencies, private fleets, neighborhoods, etc.), inviting industry experts to provide insights and lessons learned. The Company should propose a new V2G pilot (or pilots) no later than the next TEP refresh, expected to be filed no later than July 1, 2028. Finally, Michigan EIBC/United strongly urge the Company to solicit V2G applications for its Emerging Technology Fund to support the continued exploration of V2G opportunities in its service territory.

## **Conclusion**

Michigan EIBC/United appreciate the opportunity to provide comments on issues related to the changes to DTE's proposed 2027-2031 TEP. We strongly urge the Commission to establish an appropriate filing schedule to ensure that comments filed on the TEPs help to inform utility filings in general rate cases. Michigan EIBC/United recommends that the Company:

1. Voluntarily submit future TEPs at least 180 days prior to any rate case filing, ensuring stakeholders have ample time to provide meaningful input, even absent Commission action;
2. Continue evaluating a balance of positive and negative external forces that could influence EV adoption while maintaining its commitment to the growth and development of its EV rebate programs;
3. Account for societal benefits, which serve as network effects to the expansion of EV charging, in its BCA;

4. Recommend appropriate guardrails for the purposes of enabling responsible and reasonable reallocation of TEP rebate funding from one program to another;
5. Convene a technical conference that would explore opportunities to improve its E&O program efforts;
6. Expand its residential EV charger program to include MI and non-LI customers, ensuring more efficient deployment of funding, as proposed;
7. Expand MUD rebate eligibility to ensure more efficient deployment of funding, as proposed, and provide further clarity about its plans to align its rebate timeline with state grant funding cycles and improve its MUD services;
8. Expand its current public EV charger rebate program to better meet market demand;
9. Expand its workplace and retail EV charger rebate, as proposed, and consider further increasing the rebate amount to improve customer engagement;
10. Increase its fleet EV charger rebates, as proposed;
11. Improve managed charging efforts based on learnings from ongoing managed charging pilots and stakeholder engagement; and
12. Improve V2G efforts based on learnings from ongoing V2G pilots and stakeholder engagement.