

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.”¹ To that end, the Commission opened the instant docket for the receipt of DTE Electric’s (“DTE”) TEP and ordered it to file a TEP in this docket by January 11, 2024. Concurrently, following technical conferences on electric vehicle (“EV”) issues held in January 2024, on March 15, 2024, the

¹ 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>.

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.² On July 2, 2024, the Staff filed proposed TEP Filing Requirements in this docket.³ Following a stakeholder comment and reply period, on January 23, 2025, the Commission approved TEP filing requirements.⁴ 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”⁵ and allows interested persons 45 business days to submit initial comments and 30 days to submit reply comments evaluating a TEP.⁶

In accordance with the Commission’s Order in Case No. U-21538, on June 1, 2026, Consumers Energy Company (“Consumers” or “the Company”) filed its 2027-2031 TEP in the instant docket.⁷ The Michigan Energy Innovation Business Council (“Michigan EIBC”)⁸ and Advanced Energy United (“United”; collectively “Michigan EIBC/United”)⁹ and their member companies have been

² 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 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>.

³ 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>.

⁴ 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 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>.

⁵ Id., p. 2.

⁶ Id., p. 5.

⁷ Consumers Energy Company, “2027-2031 Transportation Electrification Plan,” June 1, 2026, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs0000024ndTGAAAY>.

⁸ 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.

⁹ 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.

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.”¹⁰ 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.¹¹ 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 fact that cost recovery for TEP programs is determined in a rate case.

¹⁰ 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>.

¹¹ *Id.*, p. 2.

For example, in 2024, Consumers filed its TEP in Case No. U-21538 on June 25, 2024.¹² Prior to this filing, Consumers filed for approval of the programs and proposals included in the TEP in its general rate case (Case No. U-21585) on May 31, 2024.¹³ 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, 2025.¹⁴ 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 filed its TEP annual progress report on June 27, 2025 in Case No. U-21538.¹⁵ Prior to this filing, Consumers filed for approval of the programs and proposals included in the TEP in its

¹² 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>.

¹³ 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>.

¹⁴ 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/068cs00000lnIwAAI>.

¹⁵ 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>.

general electric rate case (Case No. U-21570) on June 2, 2025.¹⁶ 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 filed its TEP in Case No. U-21538 on April 22,¹⁷ 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, 2026.¹⁸ Similarly, Consumers filed its TEP in Case No. U-21538 on June 1, 2026,¹⁹ 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, 2026.²⁰ 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 TEPs were either filed within less than a week of or, in the case of Consumers Energy, directly

¹⁶ 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>.

¹⁷ 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>.

¹⁸ 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>.

¹⁹ 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>.

²⁰ 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>.

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.”²¹ 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.”²²

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

²¹ 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>.

²² *Ibid.*

“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.”²³ 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, as of Q4 2025, there were 50,617 EVs in its service territory.²⁴ This represents 32% of the EVs registered in the State of Michigan.²⁵ Using data from S&P Global in partnership with the Michigan Secretary of State to assess historical adoption trends, the Company established a low-, base-, and high-case for its future market share projections for each vehicle segment within the Company’s service territory.²⁶ According to the Company, “the base case for light-duty EV adoption is developed using a rolling quarterly growth rate derived from the most recent two years of historical data.”²⁷ Assuming that short-term adoption will follow more recent

²³ *Ibid.*

²⁴ Consumers Energy, Case No. U-21538, “Transportation Electrification Plan & Annual Report 2026,” June 2026, p. 13, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs000024ndTGAAY>.

²⁵ *Ibid.*

²⁶ *Id.*, p. 43.

²⁷ *Ibid.*

market trends, the Company “applies the average 12-month rolling quarterly adoption rate throughout the forecast period.”²⁸ The Company also notes that medium- and heavy-duty (“MHD”) vehicles saw an average annual growth rate of 40 percent in its service territory from 2021 to 2025.²⁹ To account for MHD EV growth in its service territory, the Company applies a 40 percent annual growth rate for the years until the Michigan Department of Education’s (“MDE”) Clean Bus Energy Grant funding has been spent. This annual growth rate gradually declines to 10 percent over the subsequent five years to reflect the diminished state and federal funding opportunities.³⁰ The low- and high-cases for both light-duty and MHD EV adoption take the base case and apply a gradual 25 percent downward or upward adjustment from 2026 to 2031, resulting in adoption levels equal to 75 percent and 125 percent of the base case, respectively.³¹ Based on these projections, the Company forecasts that EV registrations, including MHD vehicles, will increase to over 420,000 in its service territory by 2031 in the low-case, over 560,000 in the base case, and over 700,000 in the high case.³²

In accordance with the Commission’s Order in the Company’s 2025 rate case (Case No. U-21870),³³ the Company evaluated the impact of H.R. 1,³⁴ which repealed several tax credits included in the Inflation Reduction Act, such as the 30C Alternative Fuel Vehicle Refueling

²⁸ *Ibid.*

²⁹ *Id.*, p. 44.

³⁰ *Ibid.*

³¹ *Ibid.*

³² *Id.*, p. 43.

³³ Michigan Public Service Commission, Case No. U-21870, “In the matter of the application of Consumers Energy Company for authority to increase its rates for the generation and distribution of electricity and for other relief,” March 27, 2026, pp. 233-235, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001rd2XbAAI>.

³⁴ 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>.

Property Credit and the 30D Clean Vehicle Credit,³⁵ on its EV adoption forecasts in its current TEP. While the Company projects a 45 percent reduction in EV deployment across its service territory from its 2024 TEP forecast due to H.R. 1 and other persistent cost barriers,³⁶ the Company still expects significant growth in the long term. In fact, the updated EV adoption forecast indicates no change in projected EV registrations in its service territory between its 2025 TEP Annual Progress Report³⁷ and its most recent 2026 TEP,³⁸ suggesting minimal long-term impacts of these policy shifts. The Company also points to other positive influences at the state level that could impact EV adoption in its service territory, such as the launch of the final round of the Clean Bus Energy Grant funding³⁹ 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”).⁴⁰

³⁵ 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>.

³⁶ Consumers Energy, Case No. U-21538, “Transportation Electrification Plan 2024,” June 2024, p. 47, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/0688y00000EFQgtAAH>.

³⁷ 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>.

³⁸ Consumers Energy, Case No. U-21538, “Transportation Electrification Plan & Annual Report 2026,” June 2026, p. 13, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs000024ndTGAAY>.

³⁹ *Id.*, p. 49.

⁴⁰ *Id.*, p. 48.

Broadly, EVs’ improving range^{41, 42, 43, 44} and price competitiveness,^{45, 46, 47, 48, 49, 50, 51} the growth of the used EV market,^{52, 53, 54, 55} and supportive state actions^{56, 57, 58} will enable continued EV

⁴¹ 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/>.

⁴² 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-etronmustang-mach-e>.

⁴³ 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/>.

⁴⁴ 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/>.

⁴⁵ 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/>.

⁴⁶ 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/>.

⁴⁷ 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>.

⁴⁸ 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>.

⁴⁹ 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/>.

⁵⁰ 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>.

⁵¹ 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/?nxsp=9>.

⁵² 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>.

⁵³ 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>.

⁵⁴ 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>.

⁵⁵ 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/>.

⁵⁶ 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>.

⁵⁷ 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>.

⁵⁸ 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.⁵⁹

⁶⁰ Experts assert that the existence of public charging infrastructure directly enables customers to purchase EVs.^{61, 62, 63, 64} 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.
- *The war in Iran:* The ongoing war in Iran has severely constricted global oil supplies, primarily by disrupting tanker traffic through the Strait of Hormuz. This

⁵⁹ 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/41afcf3>.

⁶⁰ 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>.

⁶¹ 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/>.

⁶² 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.>

⁶³ 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>.

⁶⁴ 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>.

supply constraint has driven up national average U.S. gas prices by 40 percent, which currently sit above \$4.10 per gallon.^{65, 66} 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 \$4.40 per gallon, adding hundreds of dollars in fuel costs per year per household.^{67, 68, 69} Similarly, the statewide average cost of diesel is close to \$5.19 per gallon.⁷⁰ Today, the electricity to charge EVs costs less than half on a per-mile basis compared to gas-powered vehicles,⁷¹ and electricity prices are historically far more stable - only increasing 8.8 percent between 2018 and 2023.⁷² These fuel price increases and promises for more stability and predictability are driving increased EV interest⁷³ and EV adoption. In fact, EV adoption increased 59 percent between February and

⁶⁵ 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>.

⁶⁶ AAA, “Fuel Prices,” accessed July 24, 2026, available at <https://gasprices.aaa.com/>.

⁶⁷ *Ibid.*

⁶⁸ 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/>.

⁶⁹ 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>.

⁷⁰ AAA, “Fuel Prices,” accessed July 24, 2026, available at <https://gasprices.aaa.com/>.

⁷¹ EPRI, “The Electric Vehicle (EV) Price Stability Advantage: Electricity vs. Gasoline,” April 15, 2026, available at <https://www.epri.com/research/products/000000003002036139>.

⁷² 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.

⁷³ 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/>.

March 2026 - reaching the highest level of national EV adoption since the loss of the federal tax credits in Q4 of 2025.^{74, 75}

- *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.⁷⁶ 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.^{77, 78} With contracts already in place with customers like PepsiCo,⁷⁹ DHL,⁸⁰ Walmart,⁸¹ and Costco⁸² and the national average cost of diesel up 53 percent,^{83, 84} it is reasonable

⁷⁴ 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/>.

⁷⁵ 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>.

⁷⁶ 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/>.

⁷⁷ 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/>.

⁷⁸ 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>.

⁷⁹ 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-YndqWMCX93AtLi1bckWq9kEYdYArb60TK2b3mfLZmtcyXfNU80I1UUwnCnEtF9zh0JuNV5PYw-7FyUmulYbegsCsmPjRWm5BGRHwYeNHs1A1eU_-SAzmfrzYnsHrpjV__XvYHj_z3ZeW.

⁸⁰ 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/>.

⁸¹ 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/>.

⁸² *Ibid.*

⁸³ 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>.

⁸⁴ AAA, “Fuel Prices,” accessed June 5, 2026, available at <https://gasprices.aaa.com/>.

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 EV adoption within the Company's service territory, Michigan EIBC/United caution 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.^{85, 86, 87, 88, 89} 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 temporary market fluctuations could leave utilities ill-equipped to meet future demand and capture the long-term benefits of transportation electrification.

⁸⁵ 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/>.

⁸⁶ 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/>.

⁸⁷ 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>.

⁸⁸ 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>.

⁸⁹ 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>.

Recommendation

Michigan EIBC/United strongly support the Company's EV adoption forecasts. While recognizing current market volatility and external headwinds, Consumers Energy'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 the war in Iran, 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")

The Company's updated BCA, based on the net present value ("NPV") of the net revenue requirement, indicates that the proposed TEP portfolio produces over \$1.1 billion in NPV of net rate relief to all Consumers customers from 2025 to 2035, assuming the low-case EV adoption scenario.⁹⁰ It is unclear whether this low-case BCA assumes 100 percent of projected EV adoption and accounts for "all revenue attributable to charging and associated network effects," as was required in the Commission's final order to DTE Energy's 2025 general electric rate case (Case No. U-21860).⁹¹ However, these findings are consistent with Consumers' previous 2024 TEP⁹²

⁹⁰ Consumers Energy, Case No. U-21538, "Transportation Electrification Plan & Annual Report 2026," June 2026, p. 47, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs000024ndTGAAY>.

⁹¹ 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>.

⁹² Consumers Energy, Case No. U-21538, "Transportation Electrification Plan 2024," June 2024, p. 10, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/0688y00000EFQgtAAH>.

and 2025 TEP Annual Progress reports,⁹³ which indicated over \$570 million in NPV of net rate relief from 2024 to 2030 and over \$755 million in NPV of net rate relief from 2025 to 2031, suggesting that long-term benefits are provided across TEP portfolio for all ratepayers.

Assuming the Company is accounting for all revenue attributable to charging, this 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,^{94, 95, 96, 97} leading to significant at-home charging and revenue from electricity sales.^{98, 99, 100, 101, 102} 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

⁹³ 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>.

⁹⁴ 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/>.

⁹⁵ 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.>

⁹⁶ 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>.

⁹⁷ 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>.

⁹⁸ 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>.

⁹⁹ 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>.

¹⁰⁰ 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.

¹⁰¹ 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.

¹⁰² 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.

associated costs in Michigan.¹⁰³ 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 if this value is not already included in the projection.

In addition to the revenue attributable to charging, the Company should also ensure that its BCAs are accounting for the associated network effects, including societal benefits, provided by its programs. By definition, direct network effects occur when the value of a good increases because the number of users of that good increases.¹⁰⁴ 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.^{105, 106} As exhibited in Commonwealth Edison¹⁰⁷ and Ameren's¹⁰⁸ Beneficial

¹⁰³ 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.

¹⁰⁴ 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>.

¹⁰⁵ 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>.

¹⁰⁶ 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>.

¹⁰⁷ Illinois Commonwealth Edison, "ComEd Beneficial Electrification Plan," 2022, available at <https://icc.illinois.gov/docket/P2022-0432/documents/325766/files/567114.pdf>.

¹⁰⁸ 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 Minnesota¹⁰⁹ and Colorado¹¹⁰ TEPs, reduced greenhouse gas emissions and reduced criteria pollutant emissions can be accurately quantified by using the Federal Social Cost of Carbon (“SCC”).¹¹¹ Developed by a federal interagency working group to calculate the benefits of carbon dioxide (“CO₂”) reductions in 2010 and updated in 2016, the SCC represents an estimate of the monetized net economic damages associated with one metric ton of CO₂ 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.^{112, 113} This difference can then be converted into a cost of avoided emissions using an SCC.¹¹⁴

¹⁰⁹ 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={90B25F820000-C32B-B70E-1C25A3E2A491}&documentTitle=20228-188061-07>.

¹¹⁰ 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=.

¹¹¹ 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>.

¹¹² 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>.

¹¹³ 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.

¹¹⁴ 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,¹¹⁵ Illinois,¹¹⁶ and Colorado¹¹⁷) and public utility commissions (California,¹¹⁸ Minnesota,¹¹⁹ Nevada,¹²⁰ New York,¹²¹ and Illinois¹²²) that have identified the SCC as the best mechanism to quantify the social cost of CO₂ emissions and, therefore, the social benefits of reduced emissions, several utilities have effectively incorporated the SCC into their TEP BCAs.^{123, 124, 125, 126, 127}

The adoption and use of the SCC clearly shows that societal costs and benefits can be quantified and monetized, and as demonstrated by many utilities, those benefits can be applied to utility TEP BCAs when evaluating TEP portfolios. In the case of transportation electrification, as EV adoption

¹¹⁵ See NJ REV. STAT. § 48:3-87.3(8).

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

¹¹⁷ 2019 Colo. Sess. Laws 3290, available at https://leg.colorado.gov/sites/default/files/documents/2019A/bills/sl/2019a_sl_359.pdf.

¹¹⁸ 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>.

¹¹⁹ 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.

¹²⁰ 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.

¹²¹ 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>.

¹²² See 220 ILCS 3855/1-75(d-5)(1)(B)(i).

¹²³ 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>.

¹²⁴ Illinois Commonwealth Edison, "ComEd Beneficial Electrification Plan," 2022, available at <https://icc.illinois.gov/docket/P2022-0432/documents/325766/files/567114.pdf>.

¹²⁵ 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>.

¹²⁶ 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={90B25F820000-C32B-B70E-1C25A3E2A491}&documentTitle=20228-188061-07>.

¹²⁷ 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=

and EV charging increase, the societal benefits of reduced emissions across the Company's service territory will also increase. Consequently, societal benefits, such as CO₂ emissions reductions are a quantifiable, monetizable effect of the growing EV charging network in the Company's service territory.

Recommendation

To ensure consistency across TEP BCAs among Michigan's utilities, and in accordance with the Commission's Order in Case No. U-21860, the evaluation of all network effects, and transitively, societal benefits should also be included in the Company's BCA. Therefore, Michigan EIBC/United recommend 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.

Education and Outreach ("E&O")

For its broad E&O efforts, the Company describes several "integrated marketing and outreach activities"¹²⁸ across its PowerMIDrive Residential, PowerMIDrive Public, PowerMIFleet, and direct current fast charger ("DCFC") pilot programs, including its website, which offers important program information, access to EV specialists, and online applications,¹²⁹ as well as customer engagement events,^{130, 131} "paid and owned communication channels,"¹³² "paid media

¹²⁸ Consumers Energy, Case No. U-21538, "Transportation Electrification Plan & Annual Report 2026," June 2026, p. 19, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs000024ndTGAAY>.

¹²⁹ *Ibid.*

¹³⁰ *Id.*, p. 20.

¹³¹ *Id.*, p. 32.

¹³² *Id.*, p. 30.

campaigns,”¹³³ and targeted email outreach.¹³⁴ The Company proposes to spend \$6.2 million on E&O from 2027 to 2031.¹³⁵ Throughout its TEP, the Company also refers to various target metrics and key performance indicators (“KPIs”) (e.g., application and rebate dates, project location, project details including number of chargers, ports, the power associated with each port and charger, and total project costs, relevant meter information, etc.) by which it monitors each rebate program’s performance.¹³⁶ However, the Company does not publish these targets or KPI outcomes in its TEP, which arguably could be useful for any parties interested in providing feedback on how to improve the rebate program offerings and the E&O associated with each program.

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 purposes.¹³⁷ 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, specifically, the Company proposes to do with its \$6.2 million E&O budget.¹³⁸ Moreover, the level of E&O and

¹³³ *Id.*, p. 31.

¹³⁴ *Id.*, p. 31.

¹³⁵ *Id.*, p. 67.

¹³⁶ 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/068cs000024ndTGAAAY>.

¹³⁷ 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>.

¹³⁸ DTE Electric Company, “2027-2031 Transportation Electrification Plan,” April 22, 2026, p. 70, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

customer engagement from 2025 to 2026 markedly declined. For example, in its 2026 annual TEP report, the Company reports reaching 3,335 customers with approximately 33 direct customer contacts per day via the EV specialists.¹³⁹ However, in its 2025 annual TEP progress reports reaching nearly 4,000 customers with approximately one event per week and 127 customer contacts via the EV specialists per day.¹⁴⁰ This marks a 74 percent decline in direct customer contacts and nearly 17 percent decline in customers reached between 2025 and 2026. This is a material reduction of 74 percent in effort promoting transportation electrification in Michigan despite the benefits these efforts have proven to deliver.

Michigan EIBC/United raised similar concerns in DTE’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,”¹⁴¹ the Company largely relies on passive communication methods. Broadly, while traditional, passive communication works well for established technologies, introducing new innovations demands highly active strategies to drive consumer engagement and prompt action.^{142, 143, 144, 145} More

¹³⁹ Consumers Energy, Case No. U-21538, “Transportation Electrification Plan & Annual Report 2026,” June 2026, p. 20, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00002ndTGAAY>.

¹⁴⁰ Consumers Energy, Case No. U-21538, “Transportation Electrification Plan: Annual Progress Report 2025,” June 2025, pp. 40-41, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00000wdxWAAQ>.

¹⁴¹ DTE Electric Company, “2027-2031 Transportation Electrification Plan,” April 22, 2026, p. 69, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

¹⁴² 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>.

¹⁴³ 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>.

¹⁴⁴ 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/>.

¹⁴⁵ 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/2015/00000001/00000003/art00010>.

proactive engagement with key stakeholders like car dealerships, multi-family housing property owners, fleet operators, and community leaders can build upon and improve conversion success rate and enable businesses to optimize spending.^{146, 147} 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.¹⁴⁸

Despite the evidence that E&O could have a significant impact on TEP program cost-efficiency and effectiveness and the data, even by more conservative estimates, that shows TEP programs produce significant downward rate pressure on all ratepayers, in its final Order in DTE’s 2025 general electric rate case (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.”¹⁴⁹

Given this, stakeholders are still unable to determine the following: 1) if and how the Company’s E&O efforts are passively and proactively engaging with its various customer segment, 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

¹⁴⁶ *Ibid.*

¹⁴⁷ 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>.

¹⁴⁸ McKinsey & Company, “What is personalization?,” May 30, 2023, available at <https://www.mckinsey.com/featured-insights/mckinsey-explainers/what-is-personalization>.

¹⁴⁹ 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 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. At minimum, the Company should report in detail, in its future Annual Progress Reports and TEPs, the targets that it is setting for each rebate program, the KPIs by which it is evaluating each rebate program, how each rebate program has performed based on the identified targets and KPIs, and how each program is performing.

Charger Rebate Program Comments

PowerMIDrive Residential Rebate Investment Proposal

The Company proposes to spend approximately \$20.3 million to support the installation of nearly 40,350 home charger rebates at single-family housing residences across its service territory.^{150, 151}

The current offerings include:

- *Residential Single Family L2 rebates* - These rebates offer up to \$500 towards the cost of any Underwriters Laboratory (“UL”)-listed, ENERGY STAR-certified Level 2 (“L2”) charger.¹⁵² These rebates are also available to LI households for up to \$1,000 towards the cost of an L2 charger.¹⁵³ Eligibility requires that applicants are current Consumers Energy electric customers, have proof of EV purchase, lease, or order, agree to enroll in the Nighttime Savers or Residential Smart Hours time-of-use (“TOU”) rates, and program weekday charging to occur during super off-peak hours to avoid on-peak charging.¹⁵⁴
- *Residential Single Family Dual Cord L2 rebates* - These rebates offer up to \$500 towards the cost of any UL-listed, dual cord L2 charger, power-sharing charge, or EV Supply Equipment (“EVSE”) splitter.¹⁵⁵ Eligibility requires that applicants are current Consumers Energy electric customers, have proof of EV purchase, lease, or order, agree to enroll in a TOU rate, and program weekday charging to occur during super off-peak hours to avoid on-peak charging.¹⁵⁶

¹⁵⁰ Consumers Energy, Case No. U-21538, “Transportation Electrification Plan & Annual Report 2026,” June 2026, pp. 16-22, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs000024ndTGAAY>.

¹⁵¹ *Id.*, p. 67.

¹⁵² *Id.*, p. 16.

¹⁵³ *Id.*, p. 16.

¹⁵⁴ *Id.*, p. 17.

¹⁵⁵ *Id.*, p. 16.

¹⁵⁶ *Id.*, p. 17.

- *Monthly enrollment incentive* - To shift more charging to off-peak hours, the Company also offers a \$10 monthly incentive for new customers to enroll in its Smart Charging Incentive Program.¹⁵⁷ Participating customers can also earn a referral reward for getting their peers to sign up for a TOU rate.¹⁵⁸

The Company proposes to expand the program eligibility to include Consumers Energy customers on the standard TOU rate, which the Company suggests would increase participation in its Smart Charging Incentive program.¹⁵⁹

Recommendation

Michigan EIBC/United strongly support the Company's expansion of the residential program to include standard TOU rate participating customers. 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.

In addition, Michigan EIBC/United strongly urge the Company to increase the rebate levels of its residential program to better cover the costs of an L2 charger and its installation costs, and consider a tiered rebate structure for LI, middle-income ("MI"), and non-LI customers to make the rebate offering more attractive to a wider range of customers. For example, the Company could consider adjustments similar to those proposed by DTE in its 2026 TEP, in which it proposes to offer up to \$2,000 to LI customers, up to \$1,500 for MI customers, and up to \$500 for non-LI customers

¹⁵⁷ *Id.*, p. 16.

¹⁵⁸ *Ibid.*

¹⁵⁹ *Id.*, p. 22.

installing an L2 charger to single family residence customers in its service territory.¹⁶⁰ Furthermore, the \$10 monthly incentive currently offered to customers is quite low and could be updated to \$20/month to be more attractive for customers who have already received a rebate in the past and now only qualify for the off-peak incentive when they purchase their next EV. While this would reduce the number of rebates that the Company's TEP proposed PowerMIDrive Residential budget could support, it would likely improve program subscriptions and lead to a more efficient realization of the NPV projected in the Company's BCA.

Additionally, it is well documented that EV drivers continue to drive EVs and will likely add more EVs to their household.^{161, 162, 163} The Company should make it clearer to customers that their rebates stack. For example, a first-time applicant with two or more EVs can receive a \$500 rebate for the 50 amp circuit upgrade and an additional \$500 rebate for a dual cord L2 that is plugged into it, for a total of \$1,000. The monthly incentive for off-peak charging per vehicle is on top of that initial rebate. As such, the customer would realize significant cost savings with the dual cord and the Company would ensure that the new load is spread over off-peak hours.

Finally, Michigan EIBC/United also strongly urge the Company to consider developing a rebate level for its SFH customer segment for bidirectional charger installations. Much of the Company's

¹⁶⁰ DTE Electric Company, "2027-2031 Transportation Electrification Plan," April 22, 2026, p. 43, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

¹⁶¹ Johnson, P., "Once you go EV, you don't go back: Study finds 96% of owners plan to stay electric," *Electrek.com*, February 18, 2026, available at <https://electrek.co/2026/02/18/once-you-go-ev-you-dont-go-back-96-of-owners-agree/>.

¹⁶² Washington, N., "New Toyota bZ4X Owner Says It's So Quiet He Accidentally Hit 100 MPH, Now He Gets Why EV Drivers Never Go Back," *Torque News*, April 8, 2026, available at <https://www.torquenews.com/17998/new-toyota-bz4x-owner-says-its-so-quiet-he-accidentally-hit-100-mph-now-he-gets-why-ev>.

¹⁶³ Edelstein, S., "Study: Only 1% of EV buyers would go back to gas-powered cars," *Green Car Reports*, December 13, 2024, available at https://www.greencarreports.com/news/1145270_study-only-1-of-ev-buyers-would-go-back-to-gas-powered-cars.

efforts to shed new load from EVs has been focused on stopping on-peak charging through TOU rates and encouraging customer behavioral changes. However, load-shedding the home via bidirectional chargers as opposed to just focusing on stopping on-peak charging (a very small opportunity) could greatly increase the cost-effectiveness of future V2G pilot results and Consumers should be trying to capture that value now. Not only will customers be gaining downward rate pressure from off-peak charging, but the Company could realize significant potential for avoided Midcontinent Independent System Operator (“MISO”) energy purchase costs during high locational marginal prices (“LMP”) during summer heat waves.

PowerMIDrive Public: Multi-Dwelling Unit (“MDU”) Rebate Investment Proposal

The Company indicates that approximately 33% of its customers reside in MDUs.¹⁶⁴ However, lack of charging access is a primary obstacle that prevents many MDU households from switching to an EV. While access to public charging can partly alleviate this concern, this makes it difficult for MDU residents, who typically fall into lower income brackets,¹⁶⁵ to fully take advantage of the fuel savings benefits that EVs have to offer.¹⁶⁶ 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, MDU property owners face several unique dilemmas to install EV charging on premises for their residents, including:

¹⁶⁴ Consumers Energy, Case No. U-21538, “Transportation Electrification Plan & Annual Report 2026,” June 2026, p. 23, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs000024ndTGAAY>.

¹⁶⁵ 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.

¹⁶⁶ 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/>.

- *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 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 MDUs, 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 L2 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.^{167, 168} In fact, DTE reports an average installation cost of \$13,780 per port and points to significant site-specific variability.¹⁶⁹

The Company reports that of the 250 rebate applications approved as of February 2026, 78 have been issued, resulting in a 31.2 percent completion rate.¹⁷⁰ The current program offers a rebate of up to \$7,500 for the installation of at least two L2 charging ports on a maximum 100-amp circuit.¹⁷¹ Applicants are eligible for an additional rebate of an unstated quantity for installing more than two chargers, but those chargers must not exceed 50 amps or 9.6kW of power per port.¹⁷² The installed chargers must be UL-listed and ENERGY STAR certified.¹⁷³ Alternatively, applicants may choose

¹⁶⁷ Smart Columbus, "Smart Columbus Kickstarts EV Charging Deployments at Multi-Unit Dwellings: Case Study on Multi-Unit Dwelling Charging Infrastructure," 2018, available at <https://d2rfd3nxvhnf29.cloudfront.net/legacy/uploadedfiles/playbook-assets/electric-vehicle-charging/MDU-case-study-final.pdf>.

¹⁶⁸ Dunskey 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>.

¹⁶⁹ DTE Electric Company, "2027-2031 Transportation Electrification Plan," April 22, 2026, p. 43, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

¹⁷⁰ Consumers Energy, Case No. U-21538, "Transportation Electrification Plan & Annual Report 2026," June 2026, p. 24, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs000024ndTGAAY>.

¹⁷¹ *Id.*, p. 23.

¹⁷² *Ibid.*

¹⁷³ *Ibid.*

to install at least two NEMA 14-50 outlets on 100 amps of service.¹⁷⁴ Eligibility also requires that applicants are current Consumers Energy commercial electric or combination customers, own or have permission to install charging at the indicated MDU, agree to a separate meter to monitor charging load, and enroll in a commercial TOU rate.¹⁷⁵ When at least 80 percent of charging occurs outside weekday peak hours of 2 p.m. to 7 p.m., site hosts awarded a rebate are also eligible for a \$20 monthly bill credit for the first 12 months of participation.¹⁷⁶

The Company indicates that the program has performed exceptionally well, with load from rebated chargers increasing by 290 percent and delivering approximately 158,000 kWh from March 2025 to February 2026.¹⁷⁷ Of this load, more than 87 percent has been delivered during off-peak hours.¹⁷⁸ Since February 2026, 38 of the Company's MDU sites also applied for EGLE's CFCI grant program and 29 have been awarded more than \$1.6 million in EGLE grants and \$540,000 in utility rebates.¹⁷⁹

Moving forward, the Company proposes to spend \$4.7 million to support the installation of nearly 625 L2 chargers at MDU properties across its service territory.¹⁸⁰ It also proposes to sunset its \$20 monthly bill credit, suggesting that the off-peak charging rates achieved from 2024 (72.3 percent) to 2026 (87.3 percent) are indicative of successful charging behavior adjustments resulting from appropriate E&O, TOU rates, and signage.¹⁸¹

¹⁷⁴ *Ibid.*

¹⁷⁵ *Ibid.*

¹⁷⁶ *Ibid.*

¹⁷⁷ *Id.*, p. 24.

¹⁷⁸ *Id.*, p. 48.

¹⁷⁹ *Id.*, p. 48.

¹⁸⁰ *Id.*, p. 67.

¹⁸¹ *Id.*, p. 34.

Recommendation

Michigan EIBC/United support the Company's proposed revisions to eliminate the \$20 bill credit incentive. While this credit, for 625 rebated properties, would cost \$75,000 from 2027 to 2031, which amounts to less than 2 percent of the total budget, eliminating it would provide relief in the MDU budget to allow for additional, larger rebates to be issued, as suggested below.

Furthermore, the Company should ensure that it is clear to MDU customers that they are currently eligible for more than just \$7,500 per 2 ports, and that these rebates can be multiplied to install significantly more ports. For example, for 10 rebates worth \$75,000, an MDU property owner would be able to install 20 ports. This creates economies of scale as a higher percentage of construction costs are covered than they would be for a single 2-port rebate applicant. Promoting the potential for larger projects would likely garner more interest and instill further driver confidence.

Additionally, to reach more MDU customers in its service territory, Michigan EIBC/United also recommend that the Company propose to expand its MDU budget and increase its rebate target to 3,000 ports and rebate amount to \$5,000 per port or a flat \$10,000 rebate to support not only a larger cost of the equipment, but also the installation of energy management software that could help better manage load. While these rebates can currently be paired with EGLE's CFCI grant program funding, the \$10 million in EGLE grants available for multifamily housing properties has

largely been allocated and applications are now closed.¹⁸² This means that MDU property owners in the Company's service territory will have no additional funding streams to cut down on the cost of charger installations in the future. As such, though the Company's MDU program has been successful so far, a \$7,500 rebate is likely going to prove less meaningful in the near future. To continue to attract MDU customers, the Company should therefore expand its MDU rebate budget to \$15 million and increase the rebate to \$5,000 per port or a flat \$10,000 rebate.

PowerMIDrive Public: Community Charging Rebate Investment Proposal

The Company's Community Charging program aims to reach municipalities and business customers with a public parking lot within one to three walkable blocks from an MDU property to serve as site hosts for local overnight L2 charging.¹⁸³ This program offers site hosts a rebate of \$7,500, with the opportunity for additional rebates when more charging ports are installed. Possible configurations eligible for the rebate include at least two UL-listed, ENERGY STAR certified L2 charging ports or a bring-your-own-charger option, which allows for the installation of two NEMA 14-50 receptacles rated for outdoor use or at least five 120-volt Level 1 ("L1") charging port outlets, on a circuit of no more than 100 amps.¹⁸⁴ Eligibility also requires that applicants are current Consumers Energy commercial electric or combination customers, own or have permission to install charging at the indicated public parking lot or curbside location, agree to a separate meter to monitor charging load, and enroll in a commercial TOU rate.¹⁸⁵

¹⁸² Michigan Department of Environment, Great Lakes, and Energy, "Clean Fuel and Charging Infrastructure Program," accessed July 23, 2026, available at <https://www.michigan.gov/egle/about/organization/materials-management/energy/rfps-loans/clean-fuel-and-charging-infrastructure-program>.

¹⁸³ Consumers Energy, Case No. U-21538, "Transportation Electrification Plan & Annual Report 2026," June 2026, p. 25, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs000024ndTGAAY>.

¹⁸⁴ *Ibid.*

¹⁸⁵ *Ibid.*

As of February 2026, the Company reports that it has issued 92 rebates from its Community Charging program, with an additional 20 rebates committed to 12 different site hosts.¹⁸⁶ Delivered energy to these charging stations has reached 360,000 kWh, representing a 78 percent increase from March 2025 to February 2026.¹⁸⁷ From March 2025 to February 2026, the Company invested \$120,000 in the Community Charging rebates.¹⁸⁸ The Company proposes to invest \$2,625,000 in its Community Charging rebate program to support 350 L2 rebates and \$37,500 to support 5 L1 rebates from 2027 to 2031, marking an increase of \$412,500 per TEP year compared to the previous year (March 2025 to February 2026).¹⁸⁹

The Company also proposes the following changes to its PowerMIDrive Public Community Charging rebate program:

- *Increase maximum output per port from 9.6 kW to 11.5kW for L2 charging* - The Company indicates that this adjustment will better align with newer EV models capable of accepting higher power levels, which would improve the efficiency of drivers' charging experiences while remaining compatible with existing infrastructure;¹⁹⁰
- *Waive separate metering requirement for applicants with no more than 10 total parking spaces* - The Company indicates that this adjustment would reduce barriers for smaller sites where "the installation of a separately metered service can cost upwards of \$15,000," thereby placing a disproportionate financial burden on prospective site hosts.¹⁹¹ Consumers

¹⁸⁶ *Id.*, p. 26.

¹⁸⁷ *Id.*, p. 27.

¹⁸⁸ *Id.*, p. 66.

¹⁸⁹ *Id.*, p. 66.

¹⁹⁰ *Id.*, p. 33.

¹⁹¹ *Id.*, pp. 33-34.

expects that by reducing this financial burden, participation in the rebate program will improve;¹⁹²

- *Remove non-billing meter requirement for primary rate customers* - The Company indicates that primary rate customer participants in its public L2 rebate programs are already largely charging during off-peak hours, thus rendering the insight from the non-billing meter inconsequential.¹⁹³ Reducing the unnecessary upfront costs and eliminating the ongoing maintenance costs associated with the non-billing meter should improve program participation;¹⁹⁴ and
- *Utilize the Low-Income Population indicator within EGLE's MiEJScreen tool* - The Company indicates that use of this indicator would allow it to “more directly identify communities where more than 50% of residents live at or below 200% of the Federal Poverty Level,” making it easier to identify those communities with greater economic need to participate in the Company’s rebate programs.¹⁹⁵

Recommendation

Michigan EIBC/United strongly supports the continuation of this rebate program, and the Company’s proposed changes and budget, which would allow the Company to reach more prospective site hosts that fit the stated criteria.

¹⁹² *Id.*, p. 34.

¹⁹³ *Ibid.*

¹⁹⁴ *Ibid.*

¹⁹⁵ *Id.*, pp. 34-35.

PowerMIDrive Public: Overnight Destination Charging Rebate Investment Proposal

The Company's Overnight Destination Charging program aims to reach destinations frequented by local and out-of-state tourists, and where visitors often park for extended hours, such as "hotels, motels, campgrounds, and long-term airport parking."¹⁹⁶ This program offers site hosts where visitors are likely to park for extended hours a rebate of \$7,500, with the opportunity for additional rebates when they install more charging ports. Possible configurations eligible for the rebate include at least two UL-listed, ENERGY STAR certified L2 charging ports or at least five 120-volt L1 charging port outlets, on a circuit of no more than 100 amps.¹⁹⁷ Eligibility also requires that applicants are current Consumers Energy commercial electric or combination customers, agree to a separate meter to monitor charging load, enroll in a commercial TOU rate, and agree to post signage provided by the Company to indicate charging EV-only parking spaces.¹⁹⁸

As of February 2026, the Company reports the issuance of 163 rebates from its Overnight Destination Charging program, with an additional 138 rebates committed to more than 50 different site hosts.¹⁹⁹ Delivered energy to these charging stations has reached nearly 400,000 kWh, representing a 75 percent increase from March 2025 to February 2026.²⁰⁰ From March 2025 to February 2026, the Company invested \$357,734 in the Overnight Destination Charging rebates.²⁰¹ The Company proposes to invest \$4,612,500 in its Overnight Destination Charging rebate program to support 615 L2 rebates and \$37,500 to support 5 L1 rebates from 2027 to 2031, marking an

¹⁹⁶ *Id.*, p. 27.

¹⁹⁷ *Ibid.*

¹⁹⁸ *Ibid.*

¹⁹⁹ *Id.*, p. 28.

²⁰⁰ *Id.*, p. 27.

²⁰¹ *Id.*, p. 66.

increase of over \$572,000 per TEP year compared to the previous year (March 2025 to February 2026).²⁰²

Like the Community Charging rebate program, the Company proposes the same changes to its PowerMIDrive Public Overnight Destination Charging rebate program:

- *Increase maximum output per port from 9.6 kW to 11.5kW for L2 charging* - The Company indicates that this adjustment will better align with newer EV models capable of accepting higher power levels, which would improve the efficiency of drivers' charging experiences while remaining compatible with existing infrastructure;²⁰³
- *Waive separate metering requirement for applicants with no more than 10 total parking spaces* - The Company indicates that this adjustment would reduce barriers for smaller sites where "the installation of a separately metered service can cost upwards of \$15,000," thereby placing a disproportionate financial burden on prospective site hosts.²⁰⁴ Consumers expects that by reducing this financial burden, this enhancement will improve participation in these rebate programs;²⁰⁵
- *Remove non-billing meter requirement for primary rate customers* - The Company indicates that primary rate customer participants in its public L2 rebate programs are already largely charging during off-peak hours, thus rendering the insight from the non-billing meter inconsequential.²⁰⁶ Reducing the unnecessary upfront costs and eliminating

²⁰² *Id.*, p. 66.

²⁰³ *Id.*, p. 33.

²⁰⁴ *Id.*, pp. 33-34.

²⁰⁵ *Id.*, p. 34.

²⁰⁶ *Ibid.*

the ongoing maintenance costs associated with the non-billing meter should improve program participation;²⁰⁷ and

- *Utilize the Low-Income Population indicator within EGLE’s MiEJScreen tool* - The Company indicates that use of this indicator would allow it to “more directly identify communities where more than 50% of residents live at or below 200% of the Federal Poverty Level,” making it easier to identify those communities with greater economic need to participate in the Company’s rebate programs.²⁰⁸

Recommendation

Michigan EIBC/United strongly supports the continuation of this rebate program, and the Company’s proposed budget, which would allow the Company to reach more prospective site hosts that fit the stated criteria.

PowerMIDrive Public: Workplace Charging Rebate Investment Proposal

The Company’s Workplace Charging program aims to deploy L2 chargers at workplaces for employee use.²⁰⁹ This program offers site hosts a rebate of \$7,500 for the installation of at least two L2 charging ports.²¹⁰ To aid charging access, businesses can also participate in the Enhanced Workplace Charging rebate program if the business location is adjacent (within one to three walkable blocks) to neighborhoods or MDU properties with the opportunity for additional rebates when they install more charging ports.²¹¹ Participants in the enhanced rebate program can receive

²⁰⁷ *Ibid.*

²⁰⁸ *Id.*, pp. 34-35.

²⁰⁹ *Id.*, p. 29.

²¹⁰ *Ibid.*

²¹¹ *Ibid.*

from \$7,500 up to \$10,000 for the installation of at least two L2 charging ports.²¹² The two L2 charging ports must be UL-listed and ENERGY STAR certified on a circuit of no more than 100 amps.²¹³ Eligibility also requires that applicants are current Consumers Energy commercial electric or combination customers, agree to a separate meter to monitor charging load, enroll in a commercial TOU rate, and agree to post signage provided by the Company to indicate charging EV-only parking spaces.²¹⁴

From March 2025 to February 2026, the Company reports the issuance of 38 rebates from its Workplace Charging program, of which 10 awards participated in the Enhanced Workplace Charging program.²¹⁵ Delivered energy to these charging stations has reached nearly 642,000 kWh, representing 2.5 percent of L2 load, the largest energy consumption among the Company public L2 programs.²¹⁶ From March 2025 to February 2026, the Company invested \$316,595 in the Workplace Charging rebates.²¹⁷ The Company proposes to invest \$3,225,000 in its standard Workplace Charging rebate program to support 430 L2 rebates and \$250,000 in its proposed Enhanced Workplace Charging rebate program to support 25 L5 rebates from 2027 to 2031, marking an increase of over \$378,000 per TEP year compared to the previous year (March 2025 to February 2026).²¹⁸

²¹² *Ibid.*

²¹³ *Id.*, p. 30.

²¹⁴ *Ibid.*

²¹⁵ *Ibid.*

²¹⁶ *Ibid.*

²¹⁷ *Id.*, p. 66.

²¹⁸ *Ibid.*

Like its Community Charging and Overnight Destination Charging rebate programs, the Company proposes the same changes to its PowerMIDrive Public Workplace Charging rebate program:

- *Increase maximum output per port from 9.6 kW to 11.5kW for L2 charging* - The Company indicates that this adjustment will better align with newer EV models capable of accepting higher power levels, which would improve the efficiency of drivers' charging experiences while remaining compatible with existing infrastructure;²¹⁹
- *Waive separate metering requirement for applicants with no more than 10 total parking spaces* - The Company indicates that this adjustment would reduce barriers for smaller sites where “the installation of a separately metered service can cost upwards of \$15,000,” thereby placing a disproportionate financial burden on prospective site hosts.²²⁰ Consumers expects that by reducing this financial burden, this enhancement will improve participation in these rebate programs;²²¹
- *Remove non-billing meter requirement for primary rate customers* - The Company indicates that primary rate customer participants in its public L2 rebate programs are already largely charging during off-peak hours, thus rendering the insight from the non-billing meter inconsequential.²²² Reducing the unnecessary upfront costs and eliminating the ongoing maintenance costs associated with the non-billing meter should improve program participation;²²³ and
- *Utilize the Low-Income Population indicator within EGLE's MiEJScreen tool* - The Company indicates that use of this indicator would allow it to “more directly identify

²¹⁹ *Id.*, p. 33.

²²⁰ *Id.*, pp. 33-34.

²²¹ *Id.*, p. 34.

²²² *Ibid.*

²²³ *Ibid.*

communities where more than 50% of residents live at or below 200% of the Federal Poverty Level,” making it easier to identify those communities with greater economic need to participate in the Company’s rebate programs.²²⁴

Recommendation

Michigan EIBC/United strongly support the continuation of this rebate program, and the Company’s proposed budget, which would allow the Company to reach more prospective site hosts that fit the stated criteria. Michigan EIBC/United also strongly support the Company’s workplace and community charger bonus rebate opportunity of \$10,000, which is an excellent innovation to increase utilization and reach underserved areas gain charging confidence. In fact, Michigan EIBC/United believe that the Company should be prioritizing promoting this rebate opportunity.

Additionally, unless there are fees or signage in place, workplace charging is likely to still have EVs plugged in during the peak hours of the day. As such, the workplace setting represents an ideal location to begin incentivizing bidirectional chargers at a higher rebate value than the \$7,500. This will prepare the Company for future demand response events and high LMP hour mitigation. Therefore, Michigan EIBC/United strongly encourage the Company to address and propose bidirectional opportunities like this in its 2027 TEP Annual Progress Report in preparation for launching a pilot and program in its next TEP, expected to be filed no later than July 1, 2028.

²²⁴ *Id.*, pp. 34-35.

PowerMIFleet Rebate Investment Proposal

Fleet EV charger rebates primarily target two major sub-segments - public transit and school bus electrification - for L2 charging ports up to 240 volts and long-duration DCFC ports of up to 50 kW.²²⁵ This program offers site hosts a rebate of up to \$7,500 per two UL-listed, ENERGY STAR certified L2 charging ports on 100 amps of service and up to \$15,000 per long-duration DCFC port.²²⁶ Eligibility requires that applicants are current Consumers Energy commercial electric or combination customers, own or lease the site where chargers will be located, own or lease and operate at least one EV, agree to a separate meter to monitor charging load, and enroll in a commercial TOU rate.²²⁷ The program offers complementary fleet assessments to overcome critical technical barriers associated with fleet electrification.²²⁸

From March 2025 to February 2026, the Company awarded 15 L2 fleet rebates, leading to the deployment of 17 fleet EVs across the Company's service territory.²²⁹ Since February 2026, the number of rebates awarded has increased by 320 percent, leading to the deployment of 78 L2 rebates and 21 long-duration DCFC rebates.²³⁰ The Company points to delays in MDE's Clean School Bus Grant program, which announced the allocation of nearly \$44 million to Michigan school districts across the state,²³¹ as an explanation for why its fleet program lagged in program

²²⁵ *Id.*, p. 35.

²²⁶ *Ibid.*

²²⁷ *Ibid.*

²²⁸ *Id.*, pp. 35-36.

²²⁹ *Id.*, p. 36.

²³⁰ *Ibid.*

²³¹ *Id.*, p. 48.

participation up to early 2026.²³² The Company indicates that average energization for fleet projects across its service territory is approximately 8 months.²³³

Additionally, the Company offers enhanced vehicle rebates for fleets serving income-qualified customers.²³⁴ In the Company's 2024 general electric rate case (Case No. U-21585), the Commission approved the Company's proposed budget of \$3 million, which the Company pulled from unused dollars set aside for fleet make-ready investments.²³⁵ Of the 20 nonprofit organizations and potential candidates for this funding, five have received rebates.²³⁶

The Company proposes the following changes to its PowerMIFleet rebate program:

- *Waive separate metering requirement for primary rate customers* - The Company indicates that primary rate customers are already incentivized to shift load off peak, suggesting that the separate meter serves as an inconsequential purpose at a great expense to the Company and customer.²³⁷ Eliminating it would drive down costs to the customer and enable the Company to reach more prospective participants, thus driving stronger program participation;²³⁸
- *Offer enhanced rebates of up to \$100,000 for eligible businesses looking to electrify at least 20 fleet vehicles* - By expanding this rebate offering, the Company hopes to attract larger fleets to participate in the program.²³⁹ This would ensure that these fleet customers

²³² *Id.*, p. 36.

²³³ *Ibid.*

²³⁴ *Id.*, p. 37.

²³⁵ *Ibid.*

²³⁶ *Ibid.*

²³⁷ *Id.*, p. 39.

²³⁸ *Ibid.*

²³⁹ *Id.*, p. 39.

would be encouraged to charge during off-peak hours.²⁴⁰ The Company suggests that the enhanced program can be supported through its existing budget,²⁴¹ and

- *Continue offering income-qualified enhanced rebates for nonprofit organizations* - The Company proposes to formalize the approach approved in its 2024 general electric rate case (Case No. U-21585), in which the Commission allowed the Company to redirect approved make-ready funding for fleets to support the purchase of EVSE and light-duty fleet vehicles, as well as cargo and transit vans.²⁴² The Company indicates that, if approved, it would develop a formal application and selection process later in 2026 for program participation.

From March 2025 to February 2026, the Company invested \$90,000 to support the issuance of long-duration DCFC rebates, \$153,750 to support the issuance of fleet L2 rebates, and \$2,116,393 to support the issuance of income-qualified enhanced rebates.²⁴³ The Company proposes to invest \$825,000 to support the issuance of long-duration DCFC rebates, \$3,150,000 to support the issuance of fleet L2 rebates, and \$2,500,000 to support the issuance of income-qualified enhanced rebates from 2027 to 2031.²⁴⁴

As noted above, 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

²⁴⁰ *Ibid.*

²⁴¹ *Ibid.*

²⁴² *Id.*, p. 39.

²⁴³ *Id.*, p. 66.

²⁴⁴ *Ibid.*

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.²⁴⁵ Furthermore, on May 19, 2026, EGLE announced the launch of a \$28 million RFP within its Fuel Transformation Program (“FTP”).²⁴⁶ Funded through the Volkswagen Environmental Mitigation Trust, the FTP will prioritize projects that significantly reduce emissions from gas- and diesel-powered vehicles and accelerate the adoption of zero-emission vehicles, like EVs.²⁴⁷ Individual awards will range from \$50,000 to \$5 million.²⁴⁸
- *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.^{249, 250} As such, it is reasonable to expect increased electrification across the commercial sector, especially among heavy-duty fleet operators.

²⁴⁵ 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>.

²⁴⁶ 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>.

²⁴⁷ 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>.

²⁴⁸ *Ibid.*

²⁴⁹ *Ibid.*

²⁵⁰ 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/>.

Recommendation

Michigan EIBC/United strongly support the Company's proposed revisions to waive the separate metering requirement for primary rate customers and to continue offering income-qualified rebates to nonprofit entities. In concept, Michigan EIBC/United also support the Company's proposal to offer enhanced rebates to larger fleet customers. However, Michigan EIBC/United question the usefulness of the latter proposal and are concerned that imposing such a stringent criterion (i.e., that fleet operators electrify at least 20 vehicles to qualify) could lead to underwhelming customer engagement. Larger fleets have electrification plans based on the clear economics of cost per mile delivery and company-wide goals that they are trying to meet, whereas smaller fleets often require more guidance throughout the electrification. Both are critical customers, but the approaches to engage with them are likely very different. For example, the \$100,000 rebate is hardly going to have an impact on a fleet that might be replacing 10 percent of its vehicles in a single year. Motivated by the opportunity to use new equipment as quickly as possible, larger fleet operators may be more interested in a utility's CIAC policies or assurances that the utility has ample supply of transformers to ensure that the energization timeline for their stations is kept at a minimum.

Conversely, small and medium-sized fleets of less than 20 vehicles, however, would likely find such a rebate opportunity quite attractive, as the capital investment to cover the cost of multiple vehicles and charging ports can be extremely cost prohibitive. Adjusting the rebate to a lower quantity per vehicle being electrified, thus resulting in more ports being installed, would therefore unlock economies of scale and vastly improve the business case for a small or medium-sized fleet electrifying multiple vehicles. As such, Michigan EIBC/United encourage the Company to develop a tiered rebate structure open to fleet operators of a wider variety of sizes with all criteria clearly

stated for prospective participants. Furthermore, Michigan EIBC/United strongly urge the Company, instead, to offer up to 10 rebates of \$10,000 per vehicle being electrified to cover a larger portion of the construction costs for charging installations. These adjustments will alleviate burdens associated with fleet electrification, such as higher installation costs and the loss of critical federal and state funding streams while ensuring that funding remains flexible to a wider variety of participants.

Additionally, Michigan EIBC/United also recommend that the Company propose to expand its PowerMIFleet budget and develop a tiered rebate structure for its long-duration DCFC to make the program more attractive to prospective fleet customers and allow program flexibility. DTE made such a proposal in its 2026 TEP, wherein it recommended the development of a tiered rebate based on the kW output capacity of each port, recommending a rebate of \$17,000 per port for DCFC with a 24 kW output capacity, \$26,000 for DCFC with a 50 kW output capacity, \$36,000 for DCFC with a 62.5 kW output capacity, \$46,000 for DCFC with a 100 kW output capacity, and \$100,000 for DCFC with a 150 kW output capacity.²⁵¹ If it were to develop a similarly tiered rebate structure for its fleet DCFC offering, to remain current with the available technology, the Company could eliminate the 62.5 kW tier, which is no longer common, and create a new tier of \$150,000 for output capacity of 200 kW or more. To continue to attract and meet the needs of a wider variety of fleet customers, the Company should therefore consider establishing a tiered rebate ranging from \$17,000 to \$150,000 to account for varying kW output capacities.

²⁵¹ DTE Electric Company, Case No. U-21538, “2027-2031 Transportation Electrification Plan,” April 2026, p. 52, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

Furthermore, in support of the Company's non-profit vehicle rebate opportunity, Michigan EIBC/United recommend that the Company incorporate driver education program into its PowerMIFleet E&O efforts to ensure that non-profits feel comfortable making the transition from ICE to EV. This will also expose more non-profit employees and community members to EVs, capitalizing on word of mouth to spread awareness about the technology.

Finally, 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 the Company from being overly conservative in its rebate forecasts for the 2027-2031 TEP. This reinforces the importance, as described above, of establishing reasonable guardrails that allow a degree of flexibility to reallocate approved funding from one rebate program to another. To meet this growing demand, the Company should increase the number of its targeted DCFC rebate deployments from 55 to 110. Assuming the implementation of a tiered rebate structure, as discussed above, the Company should expand its total PowerMIFleet rebate budget to \$7 million by adding about \$3 million to the fleet DCFC budget.

DCFC Pilot Rebate Investment Proposal

The Company indicates that 24 of the 137 DCFC projects under the previous DCFC pilot also received funds from the federal NEVI program.²⁵² The previous pilot offered \$40,000 per site for make-ready funding to support utility side of the meter upgrades and was designed to deploy infrastructure that supported at least twice the NEVI-required aggregated load of 150 kW per

²⁵² Consumers Energy, Case No. U-21538, "Transportation Electrification Plan & Annual Report 2026," June 2026, p. 41, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs000024ndTGAAY>.

site.²⁵³ As of February 2026, the Company reports that 117 of the 137 rebated sites from this first pilot phase are operational; 15 of the remaining 20 are NEVI-supported sites.²⁵⁴ From March 2025 to February 2026, Consumers indicates that “more than 9 million kWh of energy were delivered through DCFC [rebated] ports,” representing 75.5 percent of all charging load in the Company’s service territory.²⁵⁵

In its 2025 general electric rate case (Case No. U-21870), the Company proposed adjustments to its DCFC pilot and was approved to offer rebates up to \$50,000 per DCFC port for chargers rated 150 kW or more.²⁵⁶ To ensure DCFC are deployed spanning a broader geographic reach, the Company will limit rebates to communities with less than four 150 kW DCFC ports.²⁵⁷ The Company also indicates that sites will also be required to meet a variety of accessibility and operational requirements.²⁵⁸ These criteria and other mechanisms of site evaluation, as well as a map of eligible communities, will be published by the end of 2026.²⁵⁹ This pilot program will remain available for up to seven years or until funds are fully deployed.²⁶⁰

From March 2025 to February 2026, the Company invested \$2,100,000 to support the issuance of DCFC rebates across its service territory.²⁶¹ The Company proposes to invest \$12,500,000 to

²⁵³ *Ibid.*

²⁵⁴ *Ibid.*

²⁵⁵ *Id.*, pp. 41-42.

²⁵⁶ *Id.*, p. 42.

²⁵⁷ *Ibid.*

²⁵⁸ *Ibid.*

²⁵⁹ *Id.*, pp. 42-43.

²⁶⁰ *Id.*, p. 42.

²⁶¹ *Id.*, p. 66.

support the issuance of 250 DCFC rebates from 2027 to 2031, marking an increase of over \$400,000 per TEP year compared to the previous year (March 2025 to February 2026).²⁶²

While the Company does not offer specific energization timeline data, it indicates that energization timelines for DCFC projects in its service territory vary, often due to customer errors in the application process and challenges with executing easements, particularly when contingent upon third-party landowner approval.²⁶³ It also points to long lead times for critical equipment and materials, such as distribution transformers, which currently face lead times of 18 months or more.²⁶⁴ To address this challenge, the Company's EV team works closely with its Supply Chain team to proactively procure transformers in advance of confirmed site energization to reduce project lags.²⁶⁵

Recommendation

Given the critical role that public charging has in enabling equitable EV adoption,^{266, 267, 268, 269} Michigan EIBC/United strongly support the Company's proposal to maintain its current public DCFC rebate pilot. In addition, Michigan EIBC/United urge the Company to consider a tiered

²⁶² *Ibid.*

²⁶³ *Id.*, p. 62.

²⁶⁴ *Id.*, p. 63.

²⁶⁵ *Ibid.*

²⁶⁶ 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/>.

²⁶⁷ 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.>

²⁶⁸ 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>.

²⁶⁹ 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>.

rebate structure similar to that proposed in DTE’s 2026 TEP for its public on-route DCFC rebates, which offers applicants in DAC and rural areas a \$70,000 per port rebate and \$50,000 per port for applicants in non-DAC, non-rural areas.²⁷⁰ In its 2025 general electric rate case (Case No. U-21870), the Company noted that “the median and average costs of a 150 kW DCFC construction project range between approximately \$200,000 and \$237,000.”²⁷¹ Under previous conditions where the applicant could access the 30C tax credit, the Company’s \$50,000 DCFC rebate would cover about one-third of the total project costs, or the entirety of the make-ready costs, for a two-port DCFC installation.”²⁷² However, based on the Company’s 2025 cost assumptions, the make-ready cost per DCFC port would increase to between \$75,000 and \$93,500 without the tax credit. This cost increase has made it more difficult to establish a workable business case for DCFC investments, especially in rural and seasonal travel communities where charging is most needed. If the goal is to deploy funds efficiently and prioritize communities currently lacking DCFC, it may be necessary to increase the rebate amount. As such, the Company should propose to increase the DCFC rebate amount to up to \$70,000 per port, at least for DAC and rural communities.²⁷³

Furthermore, Michigan EIBC/United recommend that the Company provide more detail about how exactly the Company’s EV team is working with its Supply Chain team to coordinate advanced purchases of transformers. If the lead time is still 18 months or more for transformers,

²⁷⁰ DTE Electric Company, Case No. U-21538, “2027-2031 Transportation Electrification Plan,” April 2026, p. 48, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001wp0ldAAA>.

²⁷¹ Direct Testimony of Jeffrey A. Myrom on behalf of Consumers Energy, Case No. U-21870, June 2, 2025, p. 13, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00000s6UQyAAM>.

²⁷² *Ibid.*

²⁷³ The Company estimates that the cost of a two-port DCFC installation is roughly between \$140,000 and \$166,000, after factoring in the 30C tax credit. As such, the cost per port with the 30C tax credit is \$70,000-83,000. Without the tax credit, however, the cost of a two-port DCFC installation remains the same as the Company’s pre-tax credit estimate of \$200,000-\$237,000. As such the cost per port increases to between \$75,000 and \$93,500, a difference of between \$5,000 and 10,500. Assuming the maximum cost per port, increasing the Company’s public DCFC rebate by \$20,000 would then roughly cover the cost increase of two port.

this coordination and purchasing process, including how many transformers are purchased monthly and what metrics inform that decision, should be made clear to interested stakeholders and the Commission.

Managed Charging and Vehicle-to-Grid (“V2G”) Comments

Managed Charging

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.²⁷⁴ The Company’s managed charging portfolio, however, largely focuses on passive managed charging (primarily through time-of-day (“TOD”) rates and customer education).²⁷⁵ The Company also points to a partnership with Rhythmos, or ElectronGrid, Inc., with which it is working

on a Real-World Deployment Grant awarded by the Michigan Economic Development Corporation (MEDC) through the Michigan Mobility Funding Platform for the development of mobility technologies. Through this grant, Electron and Consumers Energy have been collaborating to further investigate solutions for proactively and precisely managing customer EV charging loads within the available capacity of existing distribution assets, including service transformers and upstream distribution infrastructure. The core objective of this pilot is to integrate precision grid-edge load capacity awareness with existing EV managed charging programs to support longer-term EV customer program development and distribution system planning. This approach is intended to position Consumers Energy to defer or avoid the need for residential distribution system upgrades while maintaining high levels of customer reliability, even as EV adoption continues to increase.²⁷⁶

²⁷⁴ Consumers Energy, Case No. U-21538, “Transportation Electrification Plan & Annual Report 2026,” June 2026, p. 8, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs000024ndTGAAY>.

²⁷⁵ 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>.

²⁷⁶ *Id.*, p. 49.

While the Company’s passive managed charging efforts should be applauded, in its 2024 (Case No. 21585) and 2025 (Case No. 21870) general electric rate cases, Company witness Jeffrey Myrom indicated that TOU rates alone are not sufficient in the long term to optimize off-peak charging and that, consequently, TEP programming must focus on optimizing EV load.^{277, 278} Active managed charging represents a significant opportunity to capitalize on all the benefits that EVs have to offer, and pilots across the country 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,”²⁷⁹ and even “allow distribution grid assets to host 1.3 to 3.2 times more EVs.”²⁸⁰ 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.²⁸¹

In its comments on DTE’s proposed 2026 TEP in the instant case (Case No. U-21538), the Alliance for Automotive Innovation also highlighted several other studies that clearly indicate the value of meaningful active managed charging programs:

- AES Indiana found that optimized charging deferred 30 percent of feeder upgrades an average of 4.3 years and 24 percent of service transformer upgrades an average of 9.1 years, totaling \$75 million in annual deferred investments.
- The Brattle Group and ev.energy found that optimized charging can avoid up to \$575 in ratepayer costs annually per EV.

²⁷⁷ Direct Testimony of Jeffrey A. Myrom on behalf of Consumers Energy, Case No. U-21585, May 31, 2024, p. 6, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00000s6UQyAAM>.

²⁷⁸ Direct Testimony of Jeffrey A. Myrom on behalf of Consumers Energy, Case No. U-21870, June 2, 2025, pp. 10-11, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00000s6UQyAAM>.

²⁷⁹ 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>.

²⁸⁰ *Id.*, p. 7.

²⁸¹ *Ibid.*

- Pacific Gas & Electric’s initial 2023 pilot shifted .81 kW more per EV to off-peak hours as compared to passive managed charging, saving customers \$25/year on utility bills.
- Pacific Gas & Electric’s 2024-26 pilot, which had 6,500 participants, showed that optimized charging lowered peak load across 89% of transformers at risk of exceeding 100% capacity, and reduced average peak load to .56 kW per vehicle as compared to only 1.28 kW per vehicle via TOU rates.
- Baltimore Gas & Electric’s Smart Charge Management Program reduced coincident peak demand by 72% (1,090 kW to 310 kW) and non-coincident peak demand by 29 percent (1,160 kW to 830 kW) and scored 1.58 on cost-effectiveness using Maryland’s jurisdiction specific test.
- The Brattle Group and Energy Hub found that optimized charging could avoid \$245 to \$400 in costs per EV annually and delay distribution system upgrades by ten years.
- Argonne National Lab and Smart Electric Power Alliance estimated roughly \$300/year per EV in deferred transformer and feeder upgrades.²⁸²

To make a managed charging program successful, however, the Alliance for Automotive Innovation also notes that setting the right goals and opening the program to a large enough set of participants, and establishing meaningful, publicly available reporting requirements, are critical to maximizing grid benefits and ensuring program cost-effectiveness.²⁸³

Finally, including bidirectional charging in the Company’s managed charging program would open up significant opportunities to mitigate LMP spikes in times of high energy demand. To illustrate, high energy demand frequently correlates with severe weather events, such as summer heatwaves, which drive regional LMPs significantly above a utility’s forecasted baseline.²⁸⁴ If the

²⁸² Alliance for Automotive Innovation, “Auto Innovators’ comments on DTE’s 2027-2031 Transportation Electrification Plan, MPSC Case No. U-21538,” June 24, 2026, pp. 1-2, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00002A7rP6AAJ>.

²⁸³ *Id.*, pp. 2-5.

²⁸⁴ McLaughlin, T., “Electric prices spike amid hot weather in US Midwest,” *Reuters*, July 28, 2026, available at <https://www.reuters.com/business/energy/electric-prices-spike-amid-hot-weather-us-midwest-2026-07-28/>.

Company's rate model assumes a summer average LMP of \$50 per megawatt-hour (MWh), extreme weather can spike real-time market prices to \$80 or \$100 per MWh, dramatically exceeding the Company's procurement projections. By incorporating bidirectional charging into the Company's managed charging portfolio, Consumers can utilize vehicle-grid integration ("VGI") as a flexible demand-side resource. During peak market spikes, targeted load shedding and power from bidirectional vehicles would allow the Company to curtail high-priced energy purchases from MISO. This localized peak-shaving helps suppress upward pressure on LMPs, bringing procurement costs closer to assumed averages and generating systemic fuel and purchase power savings for all ratepayers within the service territory.²⁸⁵

Furthermore, to transition successfully from traditional, one-way managed charging to a robust VGI framework, the Company should propose an appropriate V2G tariff no later than June 1, 2027 or the Company's next rate case, whichever comes first. This tariff should be informed by stakeholder input and approved by the Commission. This tariff must fairly compensate EV participants for the quantified grid services they provide—specifically, the avoided capacity and wholesale energy purchases that keep system-wide costs down. Formalizing this compensation

²⁸⁵ Driscoll, W., "GM Energy calls for vehicle-to-grid collaboration to cut grid costs by up to \$7 billion per year," *PV Magazine*, July 30, 2026, available at <https://pv-magazine-usa.com/2026/07/30/gm-energy-urges-vehicle-to-grid-collaboration-to-cut-grid-costs-by-up-to-7-billion-per-year/>.

structure will incentivize participant enrollment, optimize the utility's DER portfolio, and unlock the full stack of VGI benefits for both EV drivers and the broader grid.

Recommendation

Michigan EIBC/United recommend that the Company continue to explore opportunities to improve its active managed charging efforts based on the learnings from its partnership with Rhythmos. 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 managed charging pilots. Subsequently, given that the Company did not truly provide an update to its current managed charging program, as required by the Commission in its order to the Company's 2025 general electric rate case (Case No. U-21870), the Company should present learnings from this stakeholder engagement event and its experience with Rhythmos by December 31, 2026.

V2G

In its Order to the Company's 2025 general electric rate case (Case No. U-21870), the Commission indicated that it "believes they would benefit from further analysis in the Consumers' next TEP filing...[and] that [vehicle-to-everything ("V2X")] capabilities and system benefits should be evaluated in Consumers' 2026 TEP, instead of waiting for the TEP to be filed in 2028."²⁸⁶ In its 2026 TEP, the Company makes note of V2X at several points:

²⁸⁶ Michigan Public Service Commission, Case No. U-21870, "Order in the matter of the application of Consumers Energy Company for authority to increase its rates for the generation and distribution of electricity and for other relief," March 27, 2026, pp. 234-235, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs00001rd2XbAAI>.

- *In the Executive Summary* - The Company points to the Commission Order, indicating that the Company was directed to “address and evaluate telematics and actively managed charging, the [V2G] School Bus Pilot, [V2X] capabilities and system benefits.”²⁸⁷
- *In reference to the future of its PowerMIFleet rebate program* - The Company indicates that it is

evaluating the next evolution of electric transportation, including Vehicle-to-Building (V2B) and Vehicle-to-Grid (V2G) technologies, which have the potential to enable EVs to function as flexible energy assets for both customers and the electric system. These emerging capabilities may support enhanced customer resilience, improved energy cost management, and deeper integration of EVs with customer facilities and the broader electric grid. As part of this evaluation, the Company is reviewing lessons learned from pilot efforts conducted across the industry to better understand technical performance, customer experience considerations, and operational requirements. These insights will inform the potential design of a future pilot that builds on demonstrated successes while prioritizing customer value, grid benefits, and scalability.²⁸⁸
- *In reference to its future TEP Roadmap* - The Company indicates that it is

actively researching innovative ways for EV growth to provide benefits to the electric grid. Technologies under consideration include V2G, V2H, V2B, and additional battery storage capabilities that support the integration of renewable energy into EV infrastructure. Each of these technologies is currently in the early stages of evaluation. Over the next year, the Company expects to complete feasibility assessments for V2G, V2H, and V2B solutions, which may include evaluations of technological readiness, economic feasibility, customer participation potential, and grid impacts.²⁸⁹
- *In reference to its 2026 TEP stakeholder engagement meetings* - The Company indicates that “[a]cross both meetings, stakeholders raised questions regarding the proposed program enhancements and the inclusion of emerging technology such as V2G in the TEP.”²⁹⁰

²⁸⁷ Consumers Energy, Case No. U-21538, “Transportation Electrification Plan & Annual Report 2026,” June 2026, p. 5, available at <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068cs000024ndTGAAY>.

²⁸⁸ *Id.*, p. 40.

²⁸⁹ *Id.*, p. 53.

²⁹⁰ *Id.*, p. 54.

Despite these references, however, at no point does the Company provide an evaluation of V2X technologies or its capabilities, as ordered by the Commission.

Enabling V2G represents a critical opportunity for utilities and their customers to fully leverage EV technology. For EV owners who opt-in to provide power during times of grid constraint, V2G-capable EVs can not only help reduce outages for themselves and their communities, but they can also offer significant cost savings over time. For example, the Massachusetts Clean Energy Center (“MassachusettsCEC”) reports that the state’s ConnectedSolutions virtual power plant through National Grid allows certain light-duty EVs to earn roughly \$3,000 per summer.²⁹¹ MassachusettsCEC also indicates that school districts have the opportunity to earn up to \$12,000 per bus per summer.²⁹² In fact, a study by Converge Strategies and the Vehicle-Grid Integration Council indicates that a single school bus in Beverly, Massachusetts discharged 10.78 MWh to National Grid’s System and generated \$23,500 in revenue over two summers.^{293, 294}

V2G-capable EVs can not only help save EV owners money, but they also have the capacity to aid grid-operators to balance grid conditions, therefore maximizing grid utilization, particularly during times of grid constraint, and potentially delaying grid upgrades.²⁹⁵ According to a study by the Electric Power Research Institute, California’s goal of 5 million EVs on the road by 2030 could

²⁹¹ 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/>.

²⁹² *Ibid.*

²⁹³ *Ibid.*

²⁹⁴ 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.

²⁹⁵ 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>.

translate to \$1 billion in annual benefits to the electric grid.²⁹⁶ Furthermore, an Ernst & Young report indicates that with the right smart charging and V2G policies and programs in place, EVs could contribute 4% 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.²⁹⁷ 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 demonstrate the Ford F-150 Lightning’s V2G capabilities.^{298, 299}
- *California* - Following California’s 2020 blackouts, the California Public Utilities Commission rolled out an emergency reliability offering that offered EV drivers \$2/kWh to participate in dispatch events during critical grid emergencies.³⁰⁰ 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.³⁰¹

²⁹⁶ 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/>.

²⁹⁷ 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.

²⁹⁸ 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.

²⁹⁹ 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/>.

³⁰⁰ 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.

³⁰¹ *Id.*, p. 23.

Additionally, on June 9, 2026, General Motors (“GM”) announced that it would integrate bidirectional capability as a foundational standard across its EV portfolio and even activate the technology for existing customers without the need for any hardware upgrades.^{302, 303} Not only do announcements like the one from GM 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. 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 that the Company file an update to its current 2026 TEP to include a thorough evaluation of V2X capabilities and system benefits and its V2G School Bus Pilot, as directed by the Commission. Michigan EIBC/United also recommend the Company host a series of stakeholder meetings including industry experts to provide insights that could inform future pilots and identify potential target customer segments (e.g. school districts, transit agencies, private fleets, neighborhoods, etc.) that could readily engage in an effective pilot. 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.

³⁰² 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>.

³⁰³ 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/>.

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. Commit to higher levels of outreach similar to or greater than those reported in the Company's 2025 TEP;
7. Increase the rebate levels of its residential program to better cover the costs of an L2 charger and its installation costs, and consider a tiered rebate structure for LI, middle-income, and non-LI customers to make the rebate offering more attractive to a wider range of customers;

8. Develop a new bidirectional rebate offer no later than the Company's 2027 TEP Annual Progress Report and rate case;
9. Increase the MDU rebate target to 2,000 ports and the rebate amount to \$5,000 per port to support not only a larger cost of the equipment, but also the installation and energy management software that could help better manage load;
10. Maintain and adjust its current PowerMIDrive Community Charging rebate program, as proposed;
11. Maintain and adjust its current PowerMIDrive Overnight Destination Charging rebate program, as proposed;
12. Maintain and adjust its current PowerMIDrive Workplace Charging rebate program, as proposed;
13. Consider a new bidirectional rebate offer no later than the Company's 2027 TEP Annual Progress Report and rate case;
14. Waive the separate metering requirement for PowerMIFleet customers, as proposed;
15. Incorporate driver education into PowerMIFleet advisory services for non-profit fleet vehicle rebate opportunity;
16. Establish a tiered DCFC rebate structure for fleets participating in the standard rebate program to attract more customers and allow greater program flexibility;
17. Establish a tiered rebate structure for fleets participating in the enhanced rebate program such that small- and medium-size fleets are not excluded simply due to the number of vehicles being electrified;

18. Offer a tiered rebate structure for public DCFC stations 150 kW or more of \$70,000 per port for chargers located in DAC and/or rural areas, and \$50,000 per port for chargers located in non-DAC, non-rural areas;
19. Improve managed charging efforts based on learnings from ongoing managed charging partnerships and stakeholder engagement and file an update to its current TEP to include a thorough evaluation of its managed charging pilot by December 31, 2026;
20. Propose a V2G tariff to incorporate into the Company's managed charging and V2G pilots no later than June 1, 2026 or the Company's next rate case, whichever comes first;
21. File an update to its current 2026 TEP to include a thorough evaluation of V2X capabilities and system benefits and its V2G School Bus Pilot by December 31, 2026 ;
22. Host a series of stakeholder meetings including industry experts to provide insights that could inform future pilots and identify potential target customer segments; and
23. Propose a new V2G pilot no later than the 2027 TEP Annual Progress Report.