



# SOULARDARITY

Organizing for Infrastructure in Highland Park, MI

**Comments on MPSC Case No. U-18418 regarding Stakeholder Engagement in the  
Integrated Resource Planning Process  
Submitted Friday October 20th 2017**

We, the undersigned, support the comments of the Sierra Club, Earthjustice, Union of Concerned Scientists, Natural Resources Defense Council, Ecology Center, 5Lakes Energy, Environmental Law and Policy Center, EcoWorks, National Housing Trust, Midwest Energy Efficiency Alliance, and NAACP in MPSC Case No. U-18418 regarding the proposed Integrated Resource Planning process. While we support the comment submitted thus far, we believe that more concrete recommendations regarding stakeholder engagement are required.

Soulardarity believes in energy democracy, the concept that people impacted by energy decisions should have a seat at the table in making them. Unfortunately, the history of energy decisions in Michigan epitomizes the well-known saying in our communities: if you aren't at the table, you're on the menu. It has been routinely proven that a combination of efficiency, energy storage, and distributed clean energy would provide more affordable and safe power, but the executives and shareholders who benefit from dirty energy continue to lobby for gas as a primary source of energy generation and to limit public input on these decisions. Meanwhile, Michigan communities struggling with energy poverty, the health impacts of pollution, and diminishing economic opportunity are kept in the dark and out of the conversation.

A dedicated transition to distributed clean energy and efficiency can improve grid reliability, community economic development, and reduce energy costs while creating sustainable employment for Michigan citizens. Without robust stakeholder engagement, we can expect an IRP process that will not take our communities into account. To reach a better future, Michigan citizens - and especially the environmental justice communities most harmed by the current energy system - need the opportunity to advocate for the energy future that we want.

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We believe that an Integrated Resource Planning process must involve robust stakeholder engagement, and that the comments thus far submitted do not go far enough in naming the specific ways this can be achieved. A strong stakeholder engagement process should:

- ❖ Have specific focus on demographics most impacted by energy decisions - particularly low-income communities, communities of color impacted by environmental racism, rural communities harmed by resource extraction and energy poverty, and other impacted communities.
- ❖ Provide education to stakeholders to understand how the IRP process works and how to make impactful comment by working through community organizations that work directly with impacted communities to ensure culturally appropriate and effective engagement.
- ❖ Provide multiple venues, times, and formats for engagement. Multiple sessions should be held directly in impacted communities and intended to reach working people, single parents, and others with high demands on their time and capacity.
- ❖ Be accessible. Translation services should be available based on community language needs, location should be easily accessible by public transportation, location should be vetted for disability access, and child care should be provided.
- ❖ Ensure that the input from these sessions is directly conveyed to the commission, rather than being synthesized by the utilities.
- ❖ Set goals for stakeholder engagement based upon actual participation, rather than just the opportunities provided for it.
- ❖ Clearly articulate how stakeholder input will impact the process and set binding requirements around that impact.
- ❖ Be ongoing. Communities should have multiple opportunities for input throughout the process, providing feedback and guidance as the IRP evolves.

We implore you to design an engagement process that gives Michigan people the opportunity to work together towards a better energy future.

Signed,

Jackson Koeppl, Executive Director  
On Behalf Of Soulardarity