

**They did some changes to the rules about a month ago that impacted the senior program and they newly added subsections (4) and (5) of that rule (see included link)**

R460.149. Up until Dec 11<sup>th</sup> there was not anything with R460.149 that says it can only be used for reasons of nonpayment. Nothing says that. If the person is

- (1) 65 years or older, and
- (2) They advise the utility of that, and
- (3) It is after November 1st, we do not believe power can be cut, PERIOD. And if previously cut, it must be restored too.

We only believe the utilities are getting away with this now because they are claiming they are not being *advised* by the residents of their age (the “if we had only known argument”). In our opinion, many eligible seniors are only getting their power cut after Nov 1st because they have not formally advised the utility of their age, which gives the utility credible deniability to ignore the Senior Citizen Protection Program R460.149. it is a technical loophole they are exploiting, but easily fixed.

However, the caveat they put in with the new (5), they may try to say they can do shut-offs in certain circumstances still. That was after we started pointing all this out.

See here: [http://dmbinternet.state.mi.us/DMB/ORRDocs/AdminCode/1365\\_2014-038LR\\_AdminCode.pdf](http://dmbinternet.state.mi.us/DMB/ORRDocs/AdminCode/1365_2014-038LR_AdminCode.pdf)

It would appear as we found a hard and fast protection they made moves to change it. Regardless, it still has nothing to do with non-payment, they would have to say that a true safety issue exists.