

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of)	
DTE ELECTRIC COMPANY)	
for authority to increase its rates, amend)	Case No. U-20836
its rate schedules and rules governing the)	
distribution and supply of electric energy, and)	
for miscellaneous accounting authority.)	
_____)	

At the February 2, 2023 meeting of the Michigan Public Service Commission in Lansing, Michigan.

PRESENT: Hon. Daniel C. Scripps, Chair
Hon. Tremaine L. Phillips, Commissioner
Hon. Katherine L. Peretick, Commissioner

ORDER

On January 21, 2022, DTE Electric Company (DTE Electric) filed an application requesting authority to increase its retail rates by approximately \$388 million, among other forms of requested regulatory relief.

On February 18, 2022, Administrative Law Judge Sharon L. Feldman (ALJ) conducted a prehearing conference at which the ALJ granted petitions to intervene filed by, among others at this time and also later in the case, the Michigan Environmental Council; Natural Resources Defense Council, Inc.; Sierra Club; and Citizens Utility Board of Michigan (collectively, MNSC), along with the Michigan Department of Attorney General (Attorney General). DTE Electric and the Commission Staff (Staff) also participated in the proceeding.

Evidentiary hearings were held on June 29 and 30 and July 1, 5, and 7, 2022. Timely briefs were then filed, with the ALJ issuing a Proposal for Decision (PFD) on September 19, 2022.

Timely exceptions and replies to exceptions were filed thereafter.

On November 18, 2022, the Commission issued an order in the case (November 18 order) authorizing DTE Electric to implement rates that increase its annual electric revenues by \$30,557,000, on a jurisdictional basis, effective November 25, 2022.

On December 16, 2022, DTE Electric filed a petition for rehearing (petition) on the November 18 order, pursuant to Mich Admin Code, R 792.10437 (Rule 437). DTE Electric's petition alleges error and unintended consequences with regard to one issue.

On January 6, 2023, the Attorney General, MNSC, and the Staff filed answers to the petition.

DTE Electric Company's Petition for Rehearing

DTE Electric seeks rehearing on the Commission's adoption of the Attorney General's residential sales forecasting methodology for the projected test year, as set forth on pages 245-251 in the November 18 order. DTE Electric acknowledges the challenges that resulted because of the COVID-19 pandemic—noting actions that the company has taken in response to such challenges since 2020 and recognizing the post-pandemic period as being no less unprecedented while adjusting to a new normal—but argues that “approving a forecast that assumes the future environment will mirror the conditions experienced by [its] residential customers during the early days of the pandemic is not supportable.” DTE Electric's petition, p. 1. Per DTE Electric:

As we enter three years since the start of the pandemic, it is critically important that a reliable and accurate sales forecast that utilizes widely accepted industry standards is adopted. This will enable the Company to continue making necessary electrical system investments for its customers without requiring drastic measures to mitigate the substantial cash flow pressures created by the November 18 Order. Adopting the sales forecast recommended in the Proposal for Decision (“PFD”) will mitigate these unintended consequences.

DTE Electric’s petition, p. 1. For these reasons, the company requests that the Commission reconsider its decision to adopt the Attorney General’s sales forecast and instead adopt the ALJ’s recommendation as set forth in the PFD, which DTE Electric asserts “more accurately reflects the changing trend in customer usage and is consistent with prior sales forecast methodologies adopted by the Commission.” *Id.*, pp. 1-2. DTE Electric also requests that the Commission “accept the Company’s proposal to refund the incremental margin to all customers for any difference between [its] forecast and actual usage as described below.” *Id.*, p. 2.

Discussing its requests in further detail, the company begins by stating that only its residential sales forecast is in dispute, noting that the Attorney General “accepted the results of the Company’s C&I [commercial and industrial] load projection which utilized the same Michigan-specific Google Maps ‘wedge’ adjustment mechanism [the Attorney General] criticized with respect to residential load projections.” *Id.*, n. 3 (referencing 7 Tr 2621, 2642). In addition to its assertion that the Commission’s decision on this issue in the November 18 order was made in error and is inconsistent with the Commission’s acceptance of the same approach in other cases, the company argues that the Commission’s decision is also inconsistent with respect to other customer classes in this case, which overall results in unintended consequences that “are substantial and unwarranted, reducing the Company’s rates by over \$100 million – well below a reasonable and prudent level.” DTE Electric’s petition, p. 3.

DTE Electric asserts that the Commission’s reliance on the Attorney General’s simple and speculative assumption about future residential use “is demonstrably erroneous as it is unsupported by scientific methods of load forecasting analysis, is contrary to the Commission’s decision to adopt other sales forecasts utilizing the same or similar data, and was based on evidence that was materially flawed with respect to the impact of the disallowance.” *Id.* (footnote omitted). In

further support of this assertion of error, the company argues that: (1) the Attorney General’s forecasting method is unsubstantiated and varies from year to year, lending such changing sales forecasting methodologies to outcome-based data mining; (2) the Commission’s rejection of mobility data in the company’s residential sales forecast, despite statistical significance and industry recommendation and utilization, along with similar mobility data utilized without concern in Case Nos. U-20826 and U-20876 and the exact same mobility data utilized in the instant case for the company’s C&I sales, creates conflicting guidance on the use of such data for electric utility sales forecasting going forward;¹ and (3) the Commission’s correction of an approximate and material \$50 million mathematical error in the Attorney General’s evidence (from approximately \$52.7 million in evidence to approximately \$100.8 million in the November 18 order) was determined outside the record, is not authorized by law, cannot be characterized as ministerial, and cannot be upheld without reopening the record. *Id.*, pp. 4-10.

DTE Electric then expands on its claim of unintended consequences because of the November 18 order, discussing the impact of the Commission’s decision on the company’s financial ability to improve grid reliability and resilience, its financial ability to facilitate its generation transformation strategy, and cash flow pressures that could impact its credit rating, and subsequent access to cost competitive capital. To mitigate this impact, DTE Electric states that it “will need to take unsustainable actions to lessen the consequences of the sales forecast revenue disallowance adopted in the November 18 Order.” DTE Electric’s petition, p. 11. DTE Electric argues that these significant consequences, coupled with what the company asserts to be material

¹ At this point in its petition, DTE Electric also mentions another option for relief—namely, that the Commission apply the same sales forecast methodology to all customer classes in this case. DTE Electric’s petition, p. 8.

errors made by the Commission in adopting the Attorney General's forecasting methodology, warrant reconsideration of the Commission's sales forecast adjustment. *Id.*

Finally, while recognizing the Commission's apparent concerns about potential post-COVID sales anomalies to the detriment of the company's customers but also seeking a fair result supported by competent, material, and substantial evidence on the record, DTE Electric offers its commitment to the continued practice of voluntarily crediting its customers to account for COVID-19 impacts over the next year if the Commission grants rehearing and approves either the company's or the Staff's sales forecast methodology in its entirety in this case. Per DTE Electric:

In the event that incremental revenue is received due to greater than forecasted residential sales, the Company would commit to voluntarily credit customers via a mechanism similar to the COVID-related credits that the Commission approved for the Company in 2020 and 2021 and one that has been employed by other utilities throughout the pandemic.

Id., p. 12 (referencing Case Nos. U-20921, U-20932, and U-21128). Continuing, the company states that its:

commitment would span the twelve-month period beginning on the date that new rates are implemented following an order on this rehearing request. Within 60 days following this 12-month period, if there are excess residential sales, the Company will file a report in this docket outlining its refund calculation. If a refund is applicable, it will be based on the differential between actual weather normalized residential rate schedule D1 sales per customer and the forecasted average consumption per D1 customer. This differential would be multiplied by the number of customers taking service on rate schedule D1 as approved in this case and then the D1 ordered margin rate. The result of this calculation would be refunded as a one-time bill credit to customers with the ordered short-term interest rate of 1.74% applied. The total refund would be capped at the amount of the initially ordered reduction in the revenue deficiency related to changes in the sales forecast, \$100,750,000.

DTE Electric's petition, pp. 12-13 (footnotes omitted). While noting that it is neither legally required nor prohibited from issuing a refund to its customers, the company states that it will commit to this treatment under the specific and unique circumstances presented in this case if the

Commission chooses to grant rehearing and adopts the ALJ's sales forecast recommendation. *Id.*, p. 13.

Answers to the Petition for Rehearing

1. Michigan Department of Attorney General

The Attorney General contends that DTE Electric makes vague allusions to error and unintended consequences but in general fails to apply its petition to the applicable standard for rehearing and predominantly argues simply that the Commission reached the wrong conclusions. This, the Attorney General asserts, is not a basis to grant rehearing. Attorney General's answer, p. 1 (based on natural sorting order beginning with the introduction).

Expanding, the Attorney General contends that DTE Electric restates arguments previously made and raises new arguments that are untimely, incorrect, and cannot be raised at this point in the case. The Attorney General further avers that the company's arguments for the Commission to reconsider its decisions and that the Commission improperly looked outside the record to make its determination are not errors but instead disagreements by the company that do not meet the standard for rehearing and must thus be rejected. *Id.*, pp. 2-3.

The Attorney General asserts that DTE Electric's argument about unintended consequences is vague and generic, and the company's contention that it was not granted enough additional revenue as the company would like to improve its infrastructure is clearly not unintended consequences as contemplated by Rule 437. Per the Attorney General:

The Commission's order granted DTE [Electric] tens of millions of dollars in additional annual revenue, above current rates. That decision was based on the entire record and what the Commission determined that the company reasonably needs to provide reliable and safe service to its customers, infrastructure demands included. DTE [Electric]'s disagreement with the Commission's revenue deficiency determination is not a valid reason for rehearing.

Id., p. 3.

In addition to these arguments that there are insufficient grounds upon which to grant rehearing, the Attorney General also addresses seven areas where she asserts the company's petition is misleading and/or erroneous: (1) the Attorney General asserts that it is the company's wedge adjustment that is unscientific and speculative, not the proposed sales volume adjustment set forth in testimony on her behalf; (2) as used by the Attorney General and concluded by the Commission, the 2021 sales data correctly shows that residential sales are not declining and that such sales data is thus a more accurate basis on which to forecast test year sales, with the Attorney General noting that a rehearing cannot be used to rehash already addressed arguments on this topic; (3) the company's wedge adjustment based on mobility data has not been previously litigated and adjudicated by the Commission, including in Case Nos. U-20826 and U-20876, which are plan cases subject to reconciliation, not rate cases where permanent base rates are set using sales forecasts approved by the Commission; (4) contrary to the company's argument about inconsistency among customer classes, testimony on behalf of the Attorney General shows no significant variation in the test year forecast for C&I classes versus 2021 weather normalized sales that would necessitate an adjustment; (5) the Staff did not perform an analysis of the company's wedge adjustment or in any way validate the same; (6) the Attorney General's proposed net revenue adjustment (using the distribution rate charged to customers) understated the net revenue impact of the 796.4 kilowatt-hour residential sales adjustment, whereas the Commission properly and lawfully applied the company's existing rates to calculate the \$100.8 million revenue adjustment based on record evidence (a calculation which the company did not claim to contain any mathematical errors); and (7) the company's proposed sales revenue reconciliation mechanism

is unnecessary and was proposed after the record closed, thus prohibiting parties to the case an opportunity to fully vet the proposal. Attorney General's answer, pp. 3-8.

For these reasons, the Attorney General recommends that the Commission reject the company's petition in its entirety. *Id.*, p. 9.

2. Michigan Environmental Council; Natural Resources Defense Council, Inc.; Sierra Club; and Citizens Utility Board of Michigan

MNSC asserts that the Commission should deny DTE Electric's petition because it fails to meet the legal standard for rehearing. Per MNSC:

DTE [Electric]'s petition is flawed, both procedurally and substantively. Procedurally because it repeats arguments that have already been rejected, and substantively because it does not identify errors, unintended consequences, or newly discovered evidence that would merit rehearing. The Commission did not err by considering the entire record surrounding the projected test year residential sales forecasts. The Commission's decision has no unintended consequences, and no newly discovered evidence has come to light that would cast doubt on the Commission's findings. Finally, DTE [Electric]'s offer of a future refund does not redeem the petition.

MNSC's answer, p. 1. MNSC argues that the Commission came to a fair and accurate conclusion and that the company's petition should thus be rejected accordingly.

Following a summary of the record and arguments related to the company's proposed test year residential sales forecast, along with the ALJ's proposal and the Commission's decision on this issue, MNSC then expands on its arguments set forth above. *Id.*, pp. 3-7; *see also, id.*, pp. 7-12.

Responding to DTE Electric's claim that it was an error for the Commission to reject the company's wedge adjustment, MNSC asserts that DTE Electric failed to show that any utility or regulator has ever applied or approved such a wedge in a rate case and that the company also did not provide foundational information to support the wedge in the record in this case. Per MNSC, "[t]he Commission found the testing data the Company did provide is too limited in scope (6 months comparison). There is no error to support rehearing." *Id.*, p. 8. MNSC further argues

that, contrary to the company's assertions, the Commission's rejection of the wedge in this case does not create any conflicting guidance. More specifically, MNSC states:

DTE [Electric] witnesses referenced the inclusion of "Michigan mobility data" in residential sales forecasts to support its 2021 PSCR [power supply cost recovery] plan and 2021 EWR [energy waste reduction] plan filings [in Case Nos. U-20826 and U-20876]. Apparently no party challenged this aspect of the residential sales forecast in those proceedings, and the Commission did not address any aspect of the residential sales forecast generally nor mobility data specifically. That DTE [Electric] used mobility [data] in those proceedings creates no conflict with the Commission's Order in this case. First, while DTE [Electric] claims it used "the *exact same* mobility data" in this case, it is impossible to verify that assertion here – there was no mobility data in the records in those cases, nor much in this case. Second, contrary to DTE [Electric]'s assertion, there was no "Commission decision" to allow the use of "mobility data" in the PSCR and EWR proceedings. The Commission's implicit acceptance of the sales forecast in prior PSCR and EWR cases is not comparable to its rejection of DTE [Electric]'s residential sales forecast in this rate case.

Third, while DTE [Electric] claims "mobility data has been recommended and utilized throughout the forecasting industry," this rather overstates the record. . . . The [company's] testimony cites a single blog entry, dated January 5, 2021, which scarcely amounts to evidence of a method "utilized throughout the forecasting industry." The blogger introduced a potentially useful data source, but it made no attempt to demonstrate an adjustment to forecasting methodology with any level of scientific rigor. Moreover, the blogger makes no reference to a "wedge," recognizes the data is "not perfect," and notes that "baseline days probably aren't representative of the true baseline." It concludes by suggesting Google mobility data "might help to tighten things up and yield a more reasonable load" – this hardly amounts to a recommendation to utilize a wedge adjustment in a rate case residential sales forecast.

MNSC's answer, pp. 8-9 (emphasis in original; footnotes omitted). MNSC states that the company also inserts a new theory into the case in its petition (that if the wedge is unacceptable for residential sales forecasting then it should also not be used for C&I forecasts, which the company contends would result in a decrease in C&I sales). This new theory, however, should be rejected by the Commission, according to MNSC, because "[t]here is no record evidence or argument that would support making such an adjustment on rehearing." *Id.*, p. 10.

MNSC then offers three responses to DTE Electric's argument in its petition that the Commission erroneously corrected an error in the Attorney General's evidence: (1) there was no error, as the Attorney General's witness used the current distribution tariff applicable to residential customers to calculate the actual revenue impact but did not purport to calculate the same based on the approved power supply and distribution rates for the test year; (2) the company overstates the calculation, as the Commission's decision was that the company had not met its reasonableness burden with regard to its sales forecast and that the revenue impact, which the Commission in its order may or may not assess, "is simply the consequence of the Commission's findings and conclusion regarding the sales forecast" and also "a helpful exercise"; and (3) the company fails to identify any actual error in the Commission's calculation of the net revenue impact. *Id.*, pp. 10-11.

Finally, MNSC argues that DTE Electric's assertions about unintended consequences are speculative and "the consequence of more than simply the residential sales forecast – it results from all of DTE [Electric]'s planned capital expenditures over two years and the whole of the Commission's Order – the collective impact of various disallowances and reductions, the capital structure and authorized return rate, and more." *Id.*, p. 11. Per MNSC, the company "fails to identify any unintended consequence resulting from the Commission's rejection of the Company's faulty sale[s] forecast. To the contrary, the Commission's Order concluded that the record supports that cash flow in the test year from residential sales is likely to be significantly higher than DTE [Electric] forecasted." *Id.*

MNSC lastly addresses the company's offer to refund excess residential sales revenue, which MNSC asserts is not redemptive and should be rejected for four reasons: (1) this offer of a bargain (or negotiation approach) is not consistent with legal standards for rehearing; (2) such a compromise is likely unenforceable; (3) the possibility of a future voluntary credit is not equitable

to current residential customers, who will endure excessive bills with only the possibility of a credit sometime in 2024; and (4) this credit approach would improperly shift risk to residential customers rather than the company who has the burden of providing an accurate and reliable forecast of projected sales but failed to do so on the record in this case. *Id.*, p. 12.

For these reasons, MNSC requests that the Commission deny the petition.

3. The Commission Staff

The Staff responds solely for the limited purpose of replying to DTE Electric’s arguments that challenge the Commission’s authority to adopt the recalculated revenue impact of the Attorney General’s sales forecast—arguments which the Staff assert are incorrect and would undermine the Commission’s ratemaking authority. The Staff otherwise takes no position on the company’s requested relief in its petition. Staff’s answer, pp. 1-2.

In support of the above, the Staff states that it is undisputed that the Commission adopted the Attorney General’s residential sales forecasting methodology and that, in doing so, the Commission fully considered the Attorney General’s methodology against methodologies argued for by the company and the Staff. *Id.*, pp. 2-3 (citing November 18 order, pp. 245-251).

The Staff next highlights that petitions for rehearing are not merely another opportunity for a party to argue its position and asserts that “[n]ot only has the Commission considered and rejected some of the same arguments now raised again in the [company’s] Petition, . . . the Commission acted lawfully; reasonably; and based on competent, material, and substantial evidence when it adopted and applied the Attorney General’s sales forecast.” Staff’s answer, p. 3 (citing November 18 order, pp. 245-251; DTE Electric’s petition, pp. 4-7). Further, as set forth by the Staff:

The [Attorney General]’s residential sales forecasting methodology, as well as the resulting volumetric forecast, is presented in the record. (8 TR 4847–4853.) The Commission accepted the [Attorney General]’s approach and applied the proposed increase of residential sales using Staff’s calculations, which were also provided on the record, to arrive at the net revenue impact of \$100,751,000.

Staff’s answer, p. 3.

Rebutting the company’s argument that the \$100.8 million revenue impact is a material error that is not based on competent, material, and substantial evidence, the Staff states that:

[t]he realities of ratemaking are such that the Commission is free to make decisions based on the record that may result in numerical outcomes different from those of the parties. The Commission is also free to incorporate those decisions into the final revenue requirements. Moreover, MCL 24.277 provides that an “agency may use its experience, technical competence, and specialized knowledge in the evaluation of evidence presented to it.” The actual rates the Commission approves are rarely, if ever, 100% reflective of one party’s position. Approved rates are the sum result of all of the Commission’s decisions relative to the record in the case. The [Attorney General]’s residential sales forecasting methodology and the resulting volumetric forecast are all part of the record. (8 TR 4847–4853.) Accepting DTE [Electric’s] argument would render the entire rate-making process unworkable.

Staff’s answer, p. 4.

The Staff contends that the Commission’s decision on this issue was supported by record evidence, arguing that, even if the record could support the company’s position based on a preponderance of the evidence, “the Commission was justified in its record evidence-based decision to adopt the recalculated revenue impact of the [Attorney General]’s sales forecast.” *Id.*, p. 5.

For these reasons, the Staff asserts that the Commission had the authority to adopt the recalculated revenue impact of the Attorney General’s sales forecast and recommends that even if the Commission grants the company’s petition that it continue to recognize this authority in its order. *Id.*

Discussion

Rule 437 provides that a petition for rehearing may be based on a claim of error, newly discovered evidence, facts or circumstances arising after the hearing, or unintended consequences resulting from compliance with the order. Thus, unless a party can show the decision to be incorrect or improper because of errors, newly discovered evidence, facts or circumstances arising after the hearing, or unintended consequences, the Commission will not grant rehearing.

Here, DTE Electric contends that the Commission erred in its November 18 order and/or that the November 18 order has unintended consequences. The Commission disagrees.

With its contention of error, DTE Electric asserts that the Attorney General's forecasting method is unsubstantiated and varies from year to year, that the Commission's rejection of mobility data in this case creates conflicting guidance on the use of such data, and that the Commission's correction of the resulting revenue impact from that set forth in evidence by the Attorney General is not authorized by law. Responding to this, however, the Commission found the Attorney General's proposed sales forecast adjustment to be supported and persuasive and is unconvinced that it erred in this regard. November 18 order, pp. 249-251. Additionally, variability in party proposals from one case to the next is typical as parties attempt to support and advance their positions; however, a party's burden for those positions does not vary, and since raised in evidence and during briefing, the Attorney General's change in residential sales forecast methodologies in prior cases cited by the company was taken into consideration in deciding this issue in the instant case. 7 Tr 2648-2649; DTE Electric's rebuttal brief, p. 134. As far as the argument about conflicting guidance, the Commission also rebuts this notion. As acknowledged by the Attorney General and MNSC, Case Nos. U-20826 and U-20876 were plan cases subject to reconciliation, not rate cases, and neither in those cases nor in any other case before the

Commission has this wedge adjustment using mobility data issue been previously raised, litigated, or addressed. Attorney General's answer, pp. 4-5; MNSC's answer, pp. 8-9. Additionally, it is acceptable (even required in some cases) for different revenue classes to have different forecasting models. And finally, with regard to the Commission's correction of the revenue impact of its sales forecast decision, the Commission finds this type of calculation, and with the assistance of the Staff, to be appropriate as a standard and longstanding ratemaking practice to calculate revenue impacts and rates. MCL 24.277; MCL 24.282. Moreover, as recognized by the Attorney General and the Staff, all of the elements to calculate this correction were in the record. 8 Tr 4852-4853; Exhibit A-16, Schedule F3; Attorney General's answer, pp. 7-8; Staff's answer, p. 3.

As far as alleged unintended consequences, the Commission likewise disagrees with this argument from the company. Having computed the effect of all decisions made in the November 18 order, based on what the Commission determined to be reasonable and prudent considering the evidence in the case, the Commission was aware of what additional revenue it was authorizing DTE Electric to collect from its customers. The Commission finds that the company's list of potential consequences is simply another form of expressing its disagreement with the Commission's decision and agrees with the Attorney General that "DTE [Electric]'s disagreement with the Commission's revenue deficiency determination is not a valid reason for rehearing."

Attorney General's answer, p. 3.

Because the Commission finds that DTE Electric has not established a basis for rehearing, the Commission is not making any determinations on the company's contingent offer to commit to voluntary refunds for COVID-19 impacts over the next year. The Commission does, however, commend the company for seeking a creative resolution of this issue and will consider such a proposal if included as part of the record for future rate case proceedings.

THEREFORE, IT IS ORDERED that the petition for rehearing filed by DTE Electric Company is denied.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, under MCL 462.26. To comply with the Michigan Rules of Court's requirement to notify the Commission of an appeal, appellants shall send required notices to both the Commission's Executive Secretary and to the Commission's Legal Counsel. Electronic notifications should be sent to the Executive Secretary at mpscedockets@michigan.gov and to the Michigan Department of Attorney General – Public Service Division at pungpl@michigan.gov. In lieu of electronic submissions, paper copies of such notifications may be sent to the Executive Secretary and the Attorney General – Public Service Division at 7109 W. Saginaw Hwy., Lansing, MI 48917.

MICHIGAN PUBLIC SERVICE COMMISSION

Daniel C. Scripps, Chair

Tremaine L. Phillips, Commissioner

Katherine L. Peretick, Commissioner

By its action of February 2, 2023.

Lisa Felice, Executive Secretary

PROOF OF SERVICE

STATE OF MICHIGAN)

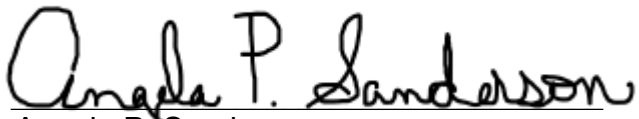
Case No. U-20836

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on February 2, 2023 A.D. she electronically notified the attached list of this **Commission Order via e-mail transmission**, to the persons as shown on the attached service list (Listserv Distribution List).


Brianna Brown

Subscribed and sworn to before me
this 2nd day of February 2023.



Angela P. Sanderson
Notary Public, Shiawassee County, Michigan
As acting in Eaton County
My Commission Expires: May 21, 2024

Service List for Case: U-20836

Name	On Behalf of	Email Address
Andrea E. Hayden	DTE Electric Company	andrea.hayden@dteenergy.com
Andrew Bashi	Soulardarity	andrew.bashi@glelc.org
Andrew Bashi	We Want Green Too	andrew.bashi@glelc.org
Benjamin L. King	Utility Workers Union of America Local 223	bking@michworkerlaw.com
Breanne K. Reitzel	DTE Electric Company	breanne.reitzel@dteenergy.com
Brian R. Gallagher	EVgo Services LLC	bgallagher@moblofleming.com
Brian W. Coyer	Great Lakes Renewable Energy Association Inc.	bwcoyer@publiclawresourcecenter.com
Brian W. Coyer	Residential Customer Group	bwcoyer@publiclawresourcecenter.com
Carlton D. Watson	DTE Electric Company	carlton.watson@dteenergy.com
Christopher M. Bzdok	Michigan Environmental Council	chris@envlaw.com
Christopher M. Bzdok	Citizens Utility Board of Michigan (CUB)	chris@envlaw.com
Christopher M. Bzdok	Sierra Club	chris@envlaw.com
Christopher M. Bzdok	Natural Resources Defense Council (NRDC)	chris@envlaw.com
Daniel E. Sonneveldt	MPSC Staff	sonneveldtd@michigan.gov
Daniel H.B. Abrams	Environmental Law & Policy Center	dabrams@elpc.org
David S. Maquera	DTE Electric Company	david.maquera@dteenergy.com
Don L. Keskey	Great Lakes Renewable Energy Association Inc.	donkeskey@publiclawresourcecenter.com
Don L. Keskey	Residential Customer Group	donkeskey@publiclawresourcecenter.com
DTE Electric Company	DTE Electric Company	mpscfilings@dteenergy.com
Hema Devi Lochan	Sierra Club	hlochan@earthjustice.org
Jennifer U. Heston	Gerdau Macsteel Inc	jheston@fraserlawfirm.com
Jody Kyler Cohn	The Kroger Company	jkylercohn@bkllawfirm.com
Joel B. King	Department of Attorney General	kingj38@michigan.gov
John R. Canzano	Utility Workers Union of America Local 223	jcanzano@michworkerlaw.com
Jon P. Christinidis	DTE Electric Company	jon.christinidis@dteenergy.com
Justin K. Ooms	Bloom Energy	jooms@potomaclaw.com
Justin K. Ooms	Energy Michigan Inc.	jooms@potomaclaw.com
Justin K. Ooms	Michigan Energy Innovation Business Council (MIEIBC)	jooms@potomaclaw.com
Justin K. Ooms	ChargePoint Inc.	jooms@potomaclaw.com
Kurt J. Boehm	The Kroger Company	kboehm@bkllawfirm.com
Laura A. Chappelle	Michigan Energy Innovation Business Council (MIEIBC)	lchappelle@potomaclaw.com
Laura A. Chappelle	Institute for Energy Innovation	lchappelle@potomaclaw.com
Laura A. Chappelle	ChargePoint Inc.	lchappelle@potomaclaw.com
Laura A. Chappelle	Bloom Energy	lchappelle@potomaclaw.com
Laura A. Chappelle	Energy Michigan Inc.	lchappelle@potomaclaw.com
Lauren D. Donofrio	DTE Electric Company	lauren.donofrio@dteenergy.com
Mark N. Templeton	Soulardarity	templeton@uchicago.edu
Mark N. Templeton	We Want Green Too	templeton@uchicago.edu
Melissa M. Horne	Walmart Inc.	mhorne@hcc-law.com
Michael J. Pattwell	Association of Businesses Advocating Tariff Equity (ABATE)	mpattwell@clarkhill.com
Michael S. Ashton	Michigan Cable Telecommunications Association	mashton@fraserlawfirm.com

Nicholas J. Schroeck	Vote Solar	schroenj@udmercy.edu
Nicholas J. Schroeck	Environmental Law & Policy Center	schroenj@udmercy.edu
Nicholas J. Schroeck	The Ecology Center	schroenj@udmercy.edu
Nicholas Q. Taylor	MPSC Staff	taylor10@michigan.gov
Nikhil Vijaykar	EVgo Services LLC	nvijaykar@keyesfox.com
Olivia R.C.A. Flower	International Transmission Company	oflower@dykema.com
Paula Johnson-Bacon	DTE Electric Company	paula.bacon@dteenergy.com
Richard J. Aaron	International Transmission Company	raaron@dykema.com
Sean P. Gallagher	Zeco Systems Inc. d/b/a Shell EV Recharge Solutions Americas	sgallagher@fraserlawfirm.com
Shannon W. Fisk	Sierra Club	sfisk@earthjustice.org
Sharon Feldman	ALJs - MPSC	feldmans@michigan.gov
Stephen A. Campbell	Association of Businesses Advocating Tariff Equity (ABATE)	scampbell@clarkhill.com
Timothy J. Lundgren	ChargePoint Inc.	tlundgren@potomaclaw.com
Timothy J. Lundgren	Michigan Energy Innovation Business Council (MIEIBC)	tlundgren@potomaclaw.com
Timothy J. Lundgren	Bloom Energy	tlundgren@potomaclaw.com
Timothy J. Lundgren	Energy Michigan Inc.	tlundgren@potomaclaw.com
Tracy Jane Andrews	Michigan Environmental Council	tjandrews@envlaw.com
Tracy Jane Andrews	Citizens Utility Board of Michigan (CUB)	tjandrews@envlaw.com
Tracy Jane Andrews	Sierra Club	tjandrews@envlaw.com
Tracy Jane Andrews	Natural Resources Defense Council (NRDC)	tjandrews@envlaw.com
Valerie J.M. Brader	Michigan Municipal Association for Utility Issues	valerie@rivenoaklaw.com
Valerie J.M. Brader	City of Ann Arbor	valerie@rivenoaklaw.com
Valerie R. Jackson	Michigan Municipal Association for Utility Issues	valeriejackson@rivenoaklaw.com
Valerie R. Jackson	City of Ann Arbor	valeriejackson@rivenoaklaw.com