

January 29, 2024

*Via E-Filing*

Ms. Lisa Felice  
Executive Secretary  
Michigan Public Service Commission  
7109 West Saginaw Highway  
Lansing, MI 48917

RE: MPSC Case No. U-21291

Dear Ms. Felice:

The following is attached for paperless electronic filing:

- Petition to Intervene by We Want Green, Too;
- Appearance of Amanda Urban on behalf of We Want Green, Too; and
- Proof of Service.

Sincerely,

/s/ Amanda Urban

Amanda Urban (P-80915)  
t-9aurba@lawclinic.uchicago.edu

xc: Parties to Case No. U-21291  
Mark Templeton – University of Chicago

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of **DTE GAS COMPANY** for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of natural gas, and for miscellaneous accounting authority

Case No. U-21291

ALJ Jonathan F. Thoits

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**PETITION TO INTERVENE BY WE WANT GREEN, TOO**

1. We Want Green, Too, a Detroit, Michigan-based nonprofit organization whose members include customers of DTE Gas Company (“DTE”), seeks to intervene in this case to represent the interests of its members in receiving cost-effective gas that is generated and delivered through prudent and environmentally sound practices.

2. We Want Green, Too is a grassroots, frontline, community-led organization focused on giving military veterans and members of Detroit’s East Side community opportunities to build environmental literacy, obtain green job readiness to become leaders in the emerging green economy, and return to communities as productive citizens. The organization started with an experimental energy efficient renovation for a home in Jackson, MI with four military veterans. After this, We Want Green, Too returned to Detroit’s East Side to rebuild a blighted 2200 square foot home with energy efficient retrofits to illustrate how to build homes that reduce the cost of utilities and increase health by creating healthy, clean indoor air spaces. We Want Green, Too also promotes energy education by equipping military veterans with solar installation and energy efficiency retrofitting skills, empowering them to address issues of air pollution, energy burden, and unemployment.

3. We Want Green, Too's members live, use gas, and pay gas bills in DTE's service territory. The rates, terms and conditions, and policies governing the provision of gas by DTE directly affect We Want Green, Too's members.

4. We Want Green, Too's members have a strong interest in having their gas needs met in an affordable, dependable, environmentally responsible, and safe manner and provided at costs that are relatively stable over the long term and allocated fairly among customer classes.

5. We Want Green, Too's members have the potential to be harmed if they incur higher, unreasonable, or unjust costs for gas or if they continue to bear disproportionate environmental, safety, and public health burdens caused by imprudent or unreasonable utility practices.

6. The Michigan Public Service Commission ("MPSC") recognizes two types of intervention:

a. The first type is intervention by right, which requires that the party will suffer an injury-in-fact as a result of the outcome of the case and that the party is within the zone of interests protected by the statute. *See, e.g., Association of Data Processing Service Organizations, Inc. v. Camp*, 397 U.S. 150; 90 S. Ct. 827; 25 L.Ed.2d 184 (1970).

b. The second type of intervention is permissive; the Commission has the discretion to permit a party to intervene in the case where that party can provide useful information to the Commission or a unique perspective on the issues in the case.

7. We Want Green, Too qualifies for intervention under both standards and will provide useful information to the Commission and a unique perspective on the issues.

8. With respect to intervention by right, We Want Green, Too's members include gas customers of DTE who could suffer injury-in-fact as a result of the outcome of the case. We Want Green, Too's members are directly impacted by DTE's provision of gas and billing practices and will suffer adverse financial consequences from an imprudent or unreasonable outcome of this rate case.

9. We Want Green, Too's members are within the zone of interest protected by MCL 460.1, *et seq.* These statutes generally protect ratepayers and provide opportunities for advocacy by ratepayer groups to protect their interests in Commission proceedings.

10. We Want Green, Too also meets the standard for permissive intervention in this proceeding. As a community-led organization representing a heavily energy burdened community, We Want Green, Too and its members will provide a unique perspective on and bring useful information to the issues in this case as described in paragraphs 2 through 5 and 8 and 9 above. We Want Green, Too staff have useful information and extensive knowledge and experience in the areas of renewable energy, energy efficiency, green building work, and energy affordability, and they will bring this expertise to bear in this proceeding.

11. While We Want Green, Too has not intervened in a DTE Gas case, it has previously intervened in several DTE Electric cases. The cases We Want Green, Too has previously intervened in include U-20836 and U-21297 (concerning DTE's requested rate increases), U-21172 (concerning DTE's Voluntary Green Pricing program and other approvals), and U-21193 (concerning DTE's proposed Integrated Resource Plan).

12. This petition to intervene is timely and before the close of the period for intervention set in the notice of prehearing.

13. No other party adequately represents the interests of We Want Green, Too and its members.

14. We Want Green, Too plans to evaluate DTE's application, testimony, and exhibits, and to conduct discovery, and then to raise those issues and take those positions that best serve the interests described above. We Want Green, Too reserves the right to advance other issues and request relief as the case develops.

15. If allowed to intervene, We Want Green, Too requests that all notices and pleadings be served on the following:

Amanda Urban (P80915)  
Attorney  
University of Chicago Law School – Abrams Environmental Law Clinic  
6020 South University Avenue  
Chicago, IL 60637  
(269) 254-0590  
t-9aurba@lawclinic.uchicago.edu

Mark Templeton (pro hac admission pending)  
Lead Counsel for We Want Green, Too  
University of Chicago Law School – Abrams Environmental Law Clinic  
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University of Chicago Law School – Abrams Environmental Law Clinic  
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For all of these reasons, We Want Green, Too respectfully requests that the Commission grant this petition to intervene in U-21291 and treat We Want Green, Too as a party to this proceeding.

Amanda Urban  
Counsel for We Want Green, Too  
Date: January 29, 2024

By:  
/s/ Amanda Urban  
Attorney  
6020 S. University Ave.  
Chicago, IL 60637  
Phone: (269) 254-0590  
Email: t-9aurba@lawclinic.uchicago.edu

MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
PUBLIC SERVICE COMMISSION

**ENTRY OF APPEARANCE IN AN ADMINISTRATIVE HEARING**

This form is issued as provided for by 1939 PA 3, as amended, and by 1933 PA 254, as amended. The filing of this form, or an acceptable alternative, is necessary to ensure subsequent service of any hearing notices, Commission orders, and related hearing documents.

**General Instructions:**

Type or print legibly in ink. For assistance or clarification, please contact the Public Service Commission at (517) 284-8090.

*Please Note: The Commission will provide **electronic** service of documents to all parties in this proceeding.*

**THIS APPEARANCE TO BE ENTERED IN ASSOCIATION WITH THE ADMINISTRATIVE HEARING:**

Case / Company Name: DTE Gas Co.

Docket No. U-21291

Please enter my appearance in the above-entitled matter on behalf of:

1. We Want Green, Too
2. (Name)
3. (Name)
4. (Name)
5. (Name)
6. (Name)
7. (Name)

Name: Amanda Urban

Address: 6020 S. University Ave

City: Chicago State: IL

Zip: 60637 Phone (269) 254-0590

Email: t-9aurba@lawclinics.uchicago.edu

Date: January 29, 2024

Signature: /s/ Amanda Urban

I am not an attorney

I am an attorney whose:

Michigan Bar # is P80915

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STATE OF MICHIGAN

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**PROOF OF SERVICE**

On the date below, an electronic copy of **Petition to Intervene by We Want Green, Too** and **Appearance of Amanda Urban on behalf of We Want Green, Too** was served on the following:

<b>Name/Party</b>	<b>E-mail Address</b>
<b>Administrative Law Judge</b> Hon. Jonathan F. Thoits	thoitsj@michigan.gov
<b>DTE Gas Company</b> Carlton D. Watson Paula Johnson-Bacon	carlton.watson@dteenergy.com paula.bacon@dteenergy.com
<b>MPSC Staff</b> Heather M.S. Durian Alena Clark	durianh@michigan.gov clarka55@michigan.gov
<b>Attorney General</b> Joel King	KingJ38@michigan.gov ag-enra-spec-lit@michigan.gov
<b>City of Ann Arbor</b> Valerie Jackson Valerie J.M. Brader	valerie@rivenoaklaw.com valeriejackson@rivenoaklaw.com ecf@rivenoak.com
<b>Citizens Utility Board of Michigan, Michigan Environmental Council</b> Christopher M. Bzdok Holly L. Hillyer Breanna Thomas	chris@tropospherelegal.com holly@tropospherelegal.com breanna@tropospherelegal.com
<b>Retail Energy Supply Association</b> Jennifer U. Heston	jheston@fraserlawfirm.com

<p><b>The Ecology Center, The Environmental Law &amp; Policy Center, Union of Concerned Scientists, and Vote Solar</b>  Nicholas Wallace  Daniel Abrams  Carolyn Boyce  Alondra Estrada</p>	<p>nwallace@elpc.org  dabrams@elpc.org  cboyce@elpc.org  astrada@elpc.org  MPSCDocket@elpc.org</p>
<p><b>We Want Green, Too</b>  Amanda Urban  Mark Templeton  Jacob Schuhardt  Sam Heppell  Madison S. Wilson</p>	<p>t-9aurba@lawclinic.uchicago.edu  templeton@uchicago.edu  jschuhardt@uchicago.edu  madisonswilson@uchicago.edu  heppell@uchicago.edu  aelc_mpsc@lawclinic.uchicago.edu</p>

The statements above are true to the best of my knowledge, information, and belief.

Amanda Urban  
Counsel for We Want Green, Too

Date: January 29, 2024

By: /s/ Amanda Urban  
Amanda Urban (P80915)  
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6020 S. University Ave.  
Chicago, IL 60637  
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