



ENVIRONMENTAL LAW & POLICY CENTER

January 30, 2024
Ms. Lisa Felice
Michigan Public Service Commission
7109 W. Saginaw Hwy.
P. O. Box 30221
Lansing, MI 48909

RE: MPSC Case No. U-21291

Dear Ms. Felice:

The following is attached for paperless electronic filing:

Motion for Admission Pro Hac Vice of Daniel Abrams

Affidavit of Daniel Abrams

Certificate of Good Standing

State Bar of Michigan Confirmation of Payment

Proof of Service

Sincerely,

Daniel Abrams
Environmental Law & Policy Center
dabrams@elpc.org

Nicholas N. Wallace (P85745)
Environmental Law and Policy Center
nwallace@elpc.org

cc: Service List, Case No. U-21291

35 East Wacker Drive, Suite 1600 • Chicago, Illinois 60601
(312) 673-6500 • www.ELPC.org

Harry Drucker, Chairperson • Howard A. Learner, Executive Director
Chicago, IL • Columbus, OH • Des Moines, IA • Grand Rapids, MI • Indianapolis, IN
Minneapolis, MN • Madison, WI • North Dakota • South Dakota • Washington, D.C.

**STATE OF MICHIGAN
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)	Docket No. U-21291
governing the distribution and supply of)	Administrative Law Judge
natural gas, and for miscellaneous accounting)	Jonathan F. Thoits
authority.)	

MOTION FOR ADMISSION PRO HAC VICE

Nicholas N. Wallace of the Environmental Law & Policy Center hereby moves that Daniel Abrams of the Environmental Law & Policy Center be granted permission to participate in this case as counsel of record. In support of this Motion, the movant states as follows:

1. Rule 309(2) of the rules of practice and procedure for the Michigan Public Service Commission (“MPSC” or “Commission”) states:

An attorney who is duly licensed to practice law in another state or in the courts of the United States may be permitted to practice before the Commission on the same basis as in the circuit courts in this State.

2. Rule 15, Section 2 of the rules concerning the State Bar of Michigan states:

Any person who is duly licensed to practice law in another state or territory, or in the District of Columbia, of the United States of America, or in any foreign country, may be permitted to engage in the trial of a specific case in a court or before an administrative tribunal in this state when associated with and on motion of an active member of the State Bar of Michigan who appears of record in the case. Such temporary permission may be revoked by the court summarily at any time for misconduct.

3. Daniel Abrams is an attorney with the non-profit legal organization the Environmental Law & Policy Center with their primary office in Chicago, IL at:

Environmental Law & Policy Center
35 E. Wacker Drive, Suite 1600
Chicago, IL 60601
dabrams@elpc.org

4. Daniel Abrams is duly licensed and admitted to practice law in the State of Illinois.
5. Nicholas N. Wallace is an active member, in good standing, of the State Bar of Michigan.

WHEREFORE, I, Nicholas N. Wallace, do here attest that I have read the affidavit of Daniel Abrams. I have made a reasonable inquiry concerning the averments made therein and believe the out-of-state attorney's representations to be true. I hereby agree to ensure that the procedures of Michigan Court Rule 8.126 are followed and respectfully request that Daniel Abrams be admitted in Case Number U-21291.

Date: January 30, 2024

Respectfully Submitted,

By: /s/ Nicholas N. Wallace
Nicholas N. Wallace (P85745)
Environmental Law and Policy Center
35 East Wacker Drive, Suite 1600
Chicago, IL 60601
nwallace@elpc.org
(312) 673-6500

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Docket No. U-21291
Administrative Law Judge
Jonathan F. Thoits

COMES NOW Daniel Abrams respectfully requesting that the Michigan Public Service Commission permit him to appear as counsel for the Environmental Law & Policy Center in the above captioned case.

Pursuant to Public Service Commission Rule 309(2) and Michigan Court Rule 8.126, Mr. Abrams states as follows:

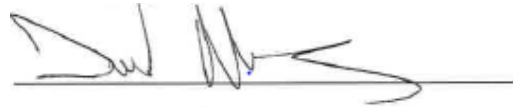
1. Mr. Abrams is an attorney at the Environmental Law & Policy Center. He was admitted to the Illinois State Bar in 2021 and is in good standing.
2. Mr. Abrams has not been denied pro hac vice status in the state of Michigan.
3. Mr. Abrams has not had pro hac vice status revoked in the state of Michigan.
4. Mr. Abrams has not been denied admission in any jurisdiction.
5. Mr. Abrams has not been formally disciplined or sanctioned by any court in the state of Michigan, or anywhere else.
6. Mr. Abrams has not been the subject of any injunction, cease-and-desist letter, or other action arising from a finding he engaged in the unauthorized practice of law in Michigan or elsewhere.
7. No formal disciplinary proceeding has ever been brought against Mr. Abrams by a disciplinary authority or unauthorized practice of law commission in any jurisdiction.
8. Mr. Abrams has not been placed on probation by a disciplinary authority in any jurisdiction.

9. Mr. Abrams has not been held formally in contempt or otherwise sanctioned by any court in a written order for disobedience to its rules or orders.
10. Mr. Abrams has reviewed the Michigan Rules of Professional Conduct, Michigan Court Rules, and the Michigan Rules of Evidence.
11. By seeking permission to appear pro hac vice, Mr. Abrams consents to the jurisdiction of Michigan's attorney disciplinary system.

I hereby verify that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Date: January 30, 2024

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Daniel Abrams', is written over a horizontal line.

Daniel Abrams
Associate Attorney
Environmental Law & Policy Center
35 East Wacker Drive, Suite 1600
Chicago, IL 60601



Attorney Registration and Disciplinary Commission
of the
Supreme Court of Illinois
www.iardc.org

One Prudential Plaza
130 East Randolph Drive, Suite
1500
Chicago, IL 60601-6219
(312) 565-2600 (800) 826-8625
Fax (312) 565-2320

3161 West White Oaks Drive
Suite 301
Springfield, IL 62704
(217) 522-6838 (800) 252-8048
Fax (217) 522-2417

Chicago
1/29/2024

Re: Daniel HB Abrams
Attorney No. 6338638

To Whom It May Concern:

The records of the Clerk of the Supreme Court of Illinois and this office reflect that Daniel HB Abrams was admitted to practice law in Illinois on 11/10/2021; is currently registered on the master roll of attorneys entitled to practice law in this state; has never been disciplined and is in good standing.

Very truly yours,
Lea S. Gutierrez
Administrator

By: 
Andrew Oliva
Registrar



State Bar of Michigan
306 Townsend St
Lansing, MI 48933-2012
(517) 346-6377

Pro Hac Vice Application Receipt

Daniel Abrams
35 E Wacker Dr Ste 1600
Chicago, IL 60601-2206
United States
dabrams@elpc.org

A copy of this receipt must be attached to the motion. The motion must be filed by the Michigan attorney in the court, administrative tribunal or agency, or in the arbitration in which you are seeking temporary admission.

Only the court, administrative tribunal or agency, or arbitrator may enter an order allowing temporary admission. Once the order is entered, the Michigan attorney must email a copy of the order to ProHacVice@michbar.org (mailto:ProHacVice@michbar.org) as soon as practicable.

Your payment was charged to credit card: *****5428

Payment Date: 01/29/2024

Description	Amount
Credit Card Transaction Fee	\$3.88
CPF-Pro Hac Vice	\$15.00
Pro Hac Vice	\$140.00
Total	\$158.88

This payment could be reversed if the bank or financial institution rejects the payment. If payment is rejected by your bank due to insufficient funds, a \$25 fee will be assessed to your account.

If you have any questions, contact ProHacVice@michbar.org (mailto:ProHacVice@michbar.org).

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PROOF OF SERVICE

I hereby certify that a true copy of the foregoing *Motion for Admission Pro Hac Vice of Daniel Abrams* was served by electronic mail upon the following Parties of Record, this Tuesday, January 30, 2024.

Administrative Law Judge thoitsj@michigan.gov
Jonathan F. Thoits

MPSC Staff
Michael J. Orris orrism@michigan.gov
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Partnership**

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**The Ecology Center, The
Environmental Law & Policy
Center, Union of Concerned
Scientists, and Vote Solar**

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Carolyn Boyce
Alondra Estrada

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