



April 8, 2024

Ms. Lisa Felice
Michigan Public Service Commission
7109 W. Saginaw Hwy.
Lansing, MI 48909

Via E-File

RE: MPSC Case No. U-21534

Dear Ms. Felice:

Attached please find the enclosed documents for filing:

- Petition to Intervene by Michigan Environmental Council;
- Appearances of Christopher Bzdok and Tracy Jane Andrews; and
- Proof of Service.

Thank you for your assistance in this matter. If you have any questions, please feel free to contact me.

Sincerely,

Christopher Bzdok
chris@tropospherelegal.com

CC: Parties to Case No. U-21534

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 its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority.

U-21534

**PETITION TO INTERVENE BY
MICHIGAN ENVIRONMENTAL COUNCIL**

1. The Michigan Environmental Council (MEC), a statewide organization, seeks to intervene in this case to represent the interests of its members in reducing their electric bills and promoting their environmental well-being through cost-effective electricity that is generated and delivered through environmentally sound practices.

2. MEC is a statewide environmental organization with 70 member groups and a collective membership of over 200,000 people.

3. MEC's members who are customers of DTE Electric Company (DTE) are directly affected by the rates, terms and conditions, and policies governing the provision of electricity by DTE to them. These organizations and their members have a strong interest in having their electricity needs met in a manner that is dependable, environmentally responsible, economically feasible, and provided at costs that are relatively stable over the long term.

4. These members have the potential to be harmed if they were required to incur higher costs and encounter environmental harm caused by imprudent utility practices.

5. The Michigan Public Service Commission recognizes two types of intervention.

a. First, 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 interest protected by the statute. See for example, *Association of Data Processing Service Organizations, Inc v Camp*, 397 US 150; 90 S Ct 827; 250 L Ed 184 (1970).

b. Second, permissive intervention, where 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.

6. MEC meets both tests and will provide useful information to the Commission and a unique perspective on the issues.

7. MEC's members are within the zone of interests 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.

8. MEC will bring significant expertise to bear in these proceedings. Its staff and witnesses have extensive knowledge and experience in the areas of environmental, energy, and ratepayer advocacy. In addition, MEC has intervened and participated in numerous cases before the Commission to advocate for these issues, both individually and in coalition with other environmental organizations.

9. MEC has intervened in many Commission electric cases in Michigan, including but not limited to the following cases:

- U-15805 Consumers Energy Renewable Energy and Energy Optimization Plans
- U-15806 Detroit Edison Renewable Energy and Energy Optimization Plans
- U-16045 Consumers Energy 2010 PSCR Plan
- U-16047 Detroit Edison 2010 PSCR Plan
- U-16045-R Consumers Energy 2010 PSCR Reconciliation
- U-16047-R DTE Electric Company 2010 PSCR Reconciliation

- U-16191 Consumers Energy General Rate Case
- U-16300 Consumers Energy Renewable Energy Reconciliation
- U-16356 Detroit Edison Renewable Energy Reconciliation
- U-16434-R Detroit Edison 2011 PSCR Reconciliation
- U-16543 Amendment to Consumers Energy Renewable Energy Plan from U-15805
- U-16656 Detroit Edison 2011 Renewable Energy Reconciliation
- U-16890 Consumers Energy 2012 PSCR Plan
- U-16890-R Consumers Energy 2013 PSCR Reconciliation
- U-16892 Detroit Edison 2012 PSCR Plan
- U-16982-R DTE Electric Company 2013 PSCR Reconciliation
- U-16991 Detroit Edison Depreciation Accrual Rates For Renewable Energy
- U-17026 Indiana Michigan Power Certificate Of Necessity
- U-17095 Consumers Energy 2013 PSCR Plan
- U-17097 Detroit Edison 2013 PSCR Plan
- U-17097-R DTE Electric Company 2013 PSCR Reconciliation
- U-17301 Consumers Energy 2013 Review & Approval Of Biennial Renewable Energy Plan
- U-17302 DTE Electric Company 2013 Review & Approval Of Biennial Renewable Energy Plan
- U-17317 Consumers Energy 2014 PSCR Reconciliation
- U-17319 DTE Electric Company 2014 PSCR Reconciliation
- U-17321 Consumers Energy 2013 Renewable Energy Reconciliation
- U-17322 DTE Electric Company 2013 Renewable Energy Reconciliation
- U-17429 Consumers Energy Certificate Of Necessity for Thetford Plant
- U-17632 DTE Electric Company 2014 Renewable Energy Reconciliation
- U-17678 Consumers Energy 2015 PSCR Plan
- U-17678-R Consumer Energy 2015 PSCR Reconciliation
- U-17680 DTE Electric Company 2015 PSCR Plan
- U-17680-R DTE Electric Company 2015 PSCR Reconciliation
- U-17688 Consumers Energy Cost Of Service
- U-17689 DTE Electric Company Cost Of Service
- U-17698 Indiana Michigan Power Cost Of Service
- U-17735 Consumers Energy 2015 General Rate Case
- U-17762 DTE Electric Company Energy Optimization Plan Biennial Review
- U-17767 DTE Electric Company 2015 General Rate Case
- U-17771 Consumers Energy Energy Optimization Plan Biennial Review
- U-17793 DTE Electric Company Biennial Renewable Energy Plan

- U-17918 Consumers Energy 2016 PSCR Plan
- U-17920 DTE Electric Company 2016 PSCR Plan
- U-17990 Consumers Energy 2016 General Rate Case
- U-18014 DTE Electric Company 2016 General Rate Case
- U-18142 Consumers Energy Company 2017 PSCR Plan Case
- U-18143 DTE Electric Company 2017 PSCR Plan Case
- U-18152 DTE Gas Company 2017 GCR Plan Case
- U-18250 Consumers Energy Company Securitization Application
- U-18255 DTE Electric General Rate Case
- U-18322 Consumers Energy Company 2018 General Rate Case
- U-20134 Consumers Energy Company General Rate Case
- U-20162 DTE Electric General Rate Case
- U-20221 DTE Electric Company 2019 PSCR Plan
- U-20222 DTE Electric Company 2019 PSCR Reconciliation
- U-20561 DTE Electric General Rate Case
- U-20697 Consumers Energy Company General Rate Case
- U-20826 DTE Electric Company 2020 PSCR Plan
- U-20963 Consumers Energy Company Rate Case
- U-20528 DTE Electric Company PSCR 2020 Reconciliation Case
- U-21090 Consumers Energy Company IRP Case
- U-20826 DTE Electric Company PSCR 2020-2021 PSCR Case
- U-20471 DTE Electric Company IRP Case
- U-21050 DTE Electric Company 2022 PSCR Plan
- U-20836 DTE Electric Company General Rate Case
- U-21051 DTE Electric Company PSCR Case
- U-21193 DTE Electric Company IRP Case
- U-21297 DTE Electric Company 2023 Rate Case

10. MEC has also worked for years to advance policies through the legislative process that would benefit the public and the environment in these areas.

11. MEC 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. MEC reserves the right to advance other issues as the case develops.

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

13. No other party adequately represents the interests of MEC and its members.

14. MEC requests that all notices and pleadings be served on:

Christopher M. Bzdok
Tracy Jane Andrews
Troposphere Legal, PLC
420 E. Front St.
Traverse City, MI 49686
chris@tropospherelegal.com
tjandrews@tropospherelegal.com

and on:

Breanna Thomas, Legal Assistant
breanna@tropospherelegal.com

For the reasons just outlined, MEC respectfully requests that the Commission grant this petition to intervene and treat it as a party to this proceeding.

TROPOSPHERE LEGAL, PLLC
Counsel for MEC

Date: April 8, 2024

By: _____

Christopher M. Bzdok (P53094)
Tracy Jane Andrews (P67467)
420 E. Front St.
Traverse City, MI 49686
Phone: 231-709-4000
Email: chris@tropospherelegal.com
tjandrews@tropospherelegal.com

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 Electric Company Docket No. U-21534

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

1. (Name) Michigan Environmental Council (MEC)
2. (Name)
3. (Name)
4. (Name)
5. (Name)
6. (Name)
7. (Name)

Name Christopher M. Bzdok
Address 420 E. Front Street

City Traverse City State MI
Zip 49686 Phone (231) 709-4000
Email chris@tropospherelegal.com
Date 04/08/2024

<input type="checkbox"/> I am not an attorney
<input checked="" type="checkbox"/> I am an attorney whose:
Michigan Bar # is P- <u>53094</u>
_____ Bar # is: _____
(state)

Signature:  Digitally signed by Christopher Bzdok
DN: cn=Christopher Bzdok, o=Troposphere Legal,
email=chris@tropospherelegal.com, c=US
Date: 2024.04.08 09:27:57 -04'00'

Save Form

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PUBLIC SERVICE COMMISSION

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

1. (Name) Michigan Environmental Council (MEC)
2. (Name)
3. (Name)
4. (Name)
5. (Name)
6. (Name)
7. (Name)

Name Tracy Jane Andrews
Address 420 E. Front Street

City Traverse City State MI
Zip 49686 Phone (231) 709-4000
Email tjandrews@tropospherelegal.com
Date 04/08/2024

I am not an attorney
 I am an attorney whose:
Michigan Bar # is P- 67467
_____ Bar # is: _____
(state)

Signature:  Digitally signed by Tracy Jane Andrews
DN: cn=Tracy Jane Andrews, o=Troposphere Legal,
PLC, email=tjandrews@tropospherelegal.com, c=US
Date: 2024.04.08 09:26:54 -0400

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BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the Application of **DTE ELECTRIC COMPANY** for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority.

Case No. U-21534

Proof of Service

On the date below, an electronic copy of **Petition to Intervene by Michigan Environmental Council and Appearances of Christopher Bzdok and Tracy Jane Andrews** was served on the following:

Name/Party	E-mail Address
Administrative Law Judge Hon. Sally L. Wallace	wallaces2@michigan.gov
DTE Electric Company Paula Johnson-Bacon Jon P. Christinidis John A. Janiszewski Breanne K. Reitzel Andrea E. Hayden	mpsc.filings@dteenergy.com paula.bacon@dteenergy.com jon.christinidis@dteenergy.com john.janiszewski@dteenergy.com Breanne.reitzel@dteenergy.com Andrea.hayden@dteenergy.com
Michigan Attorney General Celeste R. Gill	ag-enra-spec-lit@michigan.gov gillc@michigan.gov
Michigan Public Service Commission Staff Amit T. Singh Michael J. Orris Heather M.S. Durian Lori Mayabb	singha9@michigan.gov orrism@michigan.gov durianh@michigan.gov mayabbl@michigan.gov
City of Ann Arbor Valerie J.M. Brader Valerie R. Jackson	ecf@rivenoak.com valerie@rivenoaklaw.com valeriejackson@rivenoaklaw.com

{signature page to follow}

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

Troposphere Legal, PLC
Counsel for MEC

Date: April 8, 2024

By: _____

Breanna Thomas, Legal Assistant
420 E. Front St.
Traverse City, MI 49686
Phone: 231-709-4000
Email: breanna@tropospherelegal.com