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April 19, 2024

BY ELECTRONIC FILING

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

RE: MPSC Docket No.U-21534

Dear Ms. Felice:

Enclosed for filing on behalf of the Michigan Cable Telecommunications Association please find the *Petition of the Michigan Cable Telecommunications Association for Leave to Intervene*, an *Entry of Appearance in an Administrative Hearing* for the undersigned, and a *Proof of Service*.

If you have any questions regarding the attached, please do not hesitate to contact me.

Very truly yours,

Fraser Trebilcock Davis & Dunlap, P.C.

Sean P. Gallagher

Enclosures

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 Cable Telecommunications Association
2. (Name)
3. (Name)
4. (Name)
5. (Name)
6. (Name)
7. (Name)

Name Sean P. Gallagher
Address 124 West Allegan Street
Suite 1000
City Lansing State MI
Zip 48933 Phone 517-377-0820
Email sgallagher@fraserlawfirm.com
Date 04/19/2024

<input type="radio"/> I am not an attorney
<input checked="" type="radio"/> I am an attorney whose: Michigan Bar # is P- <u>73108</u> _____ Bar # is: _____ (state)

Signature: _____

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)	Case No. U-21534
and rules governing the distribution and supply)	
of electric energy, and for miscellaneous)	
<u>accounting authority.</u>)	

**PETITION OF THE MICHIGAN CABLE TELECOMMUNICATIONS
ASSOCIATION FOR LEAVE TO INTERVENE**

The Michigan Cable Telecommunications Association (“Petitioner”), by and through its attorneys, Fraser Trebilcock Davis Dunlap & Cavanaugh, P.C., hereby petitions this Honorable Commission for leave to intervene in the above-entitled action pursuant to Rule 410 of the Commission’s Rules of Practice and Procedure, being Mich Admin Code, R 792.10410. In support of this Petition, Petitioner states as follows:

1. This docket involves an application by DTE Electric Company (“DTE”) for authority to increase its rates for electricity and for other relief.
2. The Michigan Cable Telecommunications Association (“MCTA”) is a Michigan nonprofit corporation having its principal office at 412 West Ionia Street, Lansing, Michigan. MCTA’s membership consists of many of the operators of cable television systems in Michigan. MCTA represents the common interests of these cable companies in Michigan and has been recognized by the Michigan Public Service Commission as being “well suited to intervene in proceedings on behalf of the cable television industry in Michigan.” (January 29, 1985, Opinion and Order in MPSC Case No. U-7620, p 3).

3. The Petitioner has direct and vital interests in the issues raised in this docket because its members purchase electric service from DTE under various rate schedules, including the unmetered general service rate, Rate D3.1.

4. The Petitioner has previously participated in numerous cases before this Commission involving DTE's rates and charges.

5. It is the position of the Petitioner the rates proposed in this proceeding by DTE, or by other parties, should be carefully examined to assure that they are just and reasonable. The Commission should adopt a reasonable rate design and should disallow any expenditures that are found to be unnecessary, redundant, excessive, or otherwise not just and reasonable.

6. The relief which Petitioner seeks is a final order approving only those rates, terms, and conditions as are just and reasonable, and that meet all applicable legal requirements.

7. The Petitioner's interests, as set forth above, are not adequately represented by the present parties and, therefore, it would be detrimental to the public interest to deny this Petition to Intervene.

8. Because the issues set forth above are of great significance to the Petitioner and to the public, a denial of this Petition would result in a miscarriage of justice.

9. Petitioner reserves the right to take other positions and seek other relief based on a review of the Applicant's filings and discovery responses in this proceeding.

10. Petitioner request that all notices and filings be served on:

Sean P. Gallagher
Fraser Trebilcock Davis Dunlap & Cavanaugh, P.C.
124 West Allegan Street, Suite 1000
Lansing, Michigan 48933
sgallagher@fraserlawfirm.com

and

Justin Mann, Legal Assistant
jmann@fraserlawfirm.com

WHEREFORE, the Petitioner hereby respectfully requests that this Honorable Commission grant it Leave to Intervene in the above-entitled proceedings as a full party of record.

Respectfully Submitted,

Dated: April 19, 2024

Fraser Trebilcock Davis Dunlap & Cavanaugh, P.C.
Counsel for Michigan Cable Telecommunications
Association

By: _____
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**STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

In the matter of the Application of)	
DTE ELECTRIC COMPANY for authority to)	Case No. U-21534
increase its rates, amend its rate schedules and)	
rules governing the distribution and supply of)	Hon. Sally L. Wallace
electric energy, and for miscellaneous accounting)	
authority)	

PROOF OF SERVICE

Justin Mann hereby certifies that on April 19, 2024, he caused to be served the foregoing *Petition of the Michigan Cable Telecommunications Association for Leave to Intervene*, an *Entry of Appearance in an Administrative Hearing*, and this *Proof of Service* in the above docket on the persons identified on the attached service list by electronic mail.

/s/ Justin Mann
Justin Mann

Service List U-21534

Hon. Sally L. Wallace	ALJs – MPSC	Wallaces2@michigan.gov
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