

VIA ELECTRONIC FILING

May 7, 2024

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

Re: Case No. U-21534

Dear Executive Secretary Felice:

Please find the attached filings submitted on behalf of Electrify America, LLC. in the above-referenced proceeding:

- **Motion for Admission *Pro Hac Vice* of Stephen Bright**
- **Affidavit of Stephen Bright**
- **Proof of Service**
- **Certificate of Good Standing**
- **State Bar of Michigan Confirmation of Payment**

Please contact the undersigned if you have any questions or concerns regarding this filing.

Sincerely,

/s/ Jennifer A. Morante

Jennifer A. Morante (P64892)
Gordon Rees Scully Mansukhani
37000 Woodward Avenue, Suite 225
Bloomfield Hills, MI 48304
jmorante@grsm.com

CC: U-21534 Service List

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 : ALJ Sally Wallace
electric energy, and for miscellaneous :
accounting authority. :

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Rule 8.126 of the Michigan Court Rules, attorney Jennifer Morante, Michigan Bar # P64892, hereby moves that Stephen Bright be granted permission to participate in this case as counsel for Electrify America, LLC (“Electrify America”). In support of this motion, the movant states the following:

1. Stephen Bright is a Senior Counsel at Electrify America and is seeking to represent Electrify America in this proceeding.

2. Stephen Bright’s contact information is as follows:

Stephen Bright, Esq.
Electrify America, LLC
1950 Opportunity Way, Suite 1500
Reston, Virginia 20190
Phone: (781) 206-7979
Steve.Bright@electrifyamerica.com

3. Stephen Bright is duly licensed and admitted to practice law in Massachusetts and Connecticut, and is a Corporate Counsel Registrant pursuant to Part II of Rule 1A:5 of the Rules of the Supreme Court of Virginia. Attached as Exhibit A is a copy of Stephen Bright’s Massachusetts Certificate of Good Standing.

4. As of the filing of this motion, the Affidavit of Stephen Bright and the Certificate of Standing will have been submitted to the State Bar of Michigan, and all applicable fees will have been paid. Attached as Exhibit B is a receipt evidencing such submission.

5. I have read the accompanying affidavit of Stephen Bright and have made reasonable inquiry as to the statements therein. I believe that the statements made are true, and I agree to ensure that the procedures of MCR 8.126 are followed.

Based upon the foregoing, and as set forth in Stephen Bright's affidavit and accompanying attachments, I respectfully move the Michigan Public Service Commission for permission for the temporary admission of Stephen Bright to practice in Case No. U-21534.

Respectfully submitted this 7th day of May, 2024,

/s/ Jennifer A. Morante
Jennifer A. Morante (P64892)
Gordon Rees Scully Mansukhani
37000 Woodward Avenue, Suite 225
Bloomfield Hills, MI 48304
jmorante@grsm.com

STATE OF MICHIGAN

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AFFIDAVIT IN SUPPORT OF STEPHEN BRIGHT IN SUPPORT OF MOTION *PRO*
HAC VICE

I, Stephen Bright, respectfully request that the Michigan Public Service Commission permit me to appear as counsel for Electrify America, LLC in the above captioned case. Pursuant to Michigan Court Rule 8.126, Stephen Bright states as follows:

1. I am a Senior Counsel at Electrify America, LLC.
2. I was admitted to the Massachusetts Bar in 2011, the Connecticut Bar in 2020, and registered as a Corporate Counsel Registrant in Virginia in 2024. My Certificate of Good Standing in Massachusetts is attached as Attachment A.
3. I am not licensed in any states other than Massachusetts, Connecticut, and Virginia.
4. I have not sought a license to practice law in any other state other than Massachusetts, Connecticut and Virginia.
5. I have not been denied pro hac vice status in the state of Michigan.
6. I have not had pro hac vice status revoked in the state of Michigan.
7. I have not been denied admission in any jurisdiction.
8. I am not disbarred or suspended in any jurisdiction.
9. I am not subject to any pending disciplinary action.
10. I have not been the subject of any injunction, cease-and-desist letter, or other action arising from a finding I engaged in the unauthorized practice of law in Michigan or elsewhere.

11. No formal disciplinary proceeding has ever been brought against me by a disciplinary authority or unauthorized practice of law commission in any jurisdiction.

12. I have not been placed on probation by a disciplinary authority in any jurisdiction.

13. I have not been held formally in contempt or otherwise sanctioned by any court in a written order for disobedience to its rules or orders.

14. I am familiar with the Michigan Rules of Professional Conduct, Michigan Court Rules, and Michigan Rules of Evidence.

15. I have not appeared in any cases in Michigan within the past 365 days.

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

Respectfully submitted,



Stephen Bright, Esq.
Electrify America, LLC
1950 Opportunity Way, Suite 1500
Reston, Virginia 20190
Phone: (781) 206-7979
Steve.Bright@electrifyamerica.com

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PROOF OF SERVICE

On May 7, 2024, an electronic copy of the foregoing Motion for Admission *Pro Hac Vice* was served on the following via email:

DTE Electric Company

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Breanne K. Reitzel
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Michigan Attorney General

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**Citizen’s Utility Board,
Michigan Environmental
Council and Sierra Club**

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**We Want Green, Too and
Soulardarity**
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**PROTEC (The Michigan Coalition to
Protect the Public Rights of Way)**
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**Michigan Cable
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**Great Lakes Renewable Energy
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**Association of Businesses
Advocating Tariff Equity**
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**Utility Workers Union of America,
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**Michigan Energy Innovation
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Association of Michigan, and
Energy Michigan**

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

Nicholas N. Wallace

Daniel Abrams

nwallace@elpc.org

dabrams@elpc.org

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

Respectfully submitted,

/s/ Jennifer A. Morante _____.

Jennifer A. Morante (P64892)

Gordon Rees Scully Mansukhani

37000 Woodward Avenue, Suite 225

Bloomfield Hills, MI 48304

jmorante@grsm.com



MAURA S. DOYLE
CLERK

The Commonwealth of Massachusetts
SUPREME JUDICIAL COURT
FOR SUFFOLK COUNTY
JOHN ADAMS COURTHOUSE
ONE PEMBERTON SQUARE, SUITE 1300
BOSTON, MASSACHUSETTS 02108-1707
WWW.SJCCOUNTYCLERK.COM

CASE INFORMATION (617) 557-1100
FACSIMILE (617) 557-1117
ATTORNEY SERVICES (617) 557-1050
FACSIMILE (617) 557-1055

April 10, 2024

Attorney Stephen Bright
Stephen Bright
9 Forest Ave
Norwell, MA 02061
sbright23@gmail.com

IN RE: CERTIFICATE OF ADMISSION AND GOOD STANDING

Enclosed please find the Certificate of Admission and Good Standing for Commonwealth of Massachusetts Attorney **Stephen Bright**. The certificate provides certification of the attorney's date of admission and current good standing at the Bar of the Commonwealth of Massachusetts.

If you have any questions or should need further assistance, please do not hesitate to contact the Attorney Services Department at either sjccertsgs@sjc.state.ma.us or 617-557-1050.

Very truly yours,

A handwritten signature in black ink that reads "Maura S. Doyle".

MAURA S. DOYLE
Clerk
Supreme Judicial Court

MSD/ jr
Clearance: 04/10/2024 04.09.2024
Enclosures

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on **November 14, 2011**, said Court being the highest Court of Record in said Commonwealth:

Stephen Bright

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the

seal of said Court, this **tenth** day of **April**

in the year of our Lord **two thousand and twenty-four**.



MAURA S. DOYLE, Clerk

* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification. X3116.



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

Pro Hac Vice Application Receipt

Stephen Bright
1950 Opportunity Way Suite 1050
Reston, VA 20190
United States
steve.bright@electrifyamerica.com

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: *****7019

Payment Date: 05/07/2024

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).