

May 8, 2024

***Via E-Filing Only***

Ms. Lisa Felice  
Michigan Public Service Commission  
7109 W. Saginaw Hwy.  
P. O. Box 30221  
Lansing, MI 48917

RE: MPSC Case No. U-21534

Dear Ms. Felice:

Please find the following documents enclosed for electronic filing in the above-referenced matter:

- Motion for Admission *Pro Hac Vice* of Sam Heppell as Counsel of Record on Behalf of Soulardarity and We Want Green, Too;
- Affidavit of Sam Heppell in Support of Motion for Admission *Pro Hac Vice*;
- Supreme Court of Illinois Certificate of Admission to the Bar of Illinois, confirming his current good standing;
- *Pro Hac Vice* Application Receipt from the Michigan State Bar; and
- Proof of Service

Please do not hesitate to contact my office with any questions or comments.

Sincerely,

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

xc: 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

Case No. U-21534

ALJ Sally Wallace

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**MOTION FOR ADMISSION *PRO HAC VICE*  
OF SAM HEPPELL AS COUNSEL OF RECORD  
ON BEHALF OF SOULARDARITY AND WE WANT GREEN, TOO**

Amanda Urban is counsel of record in MPSC Case No. U-21534 for Soulardarity and We Want Green, Too and moves that Sam Heppell be granted permission to participate in this case as counsel of record for Soulardarity and We Want Green, Too. In support of this Motion, the movant states as follows:

1. Rule 419(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 of 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 temporarily admitted under MCR 8.126.

3. The movant is an active member in good standing of the State Bar of Michigan, and an attorney of record in this matter.

4. Sam Heppell is a Fellow of the Abrams Environmental Law Clinic, with his primary office at 6020 South University Avenue, Chicago, Illinois 60637. His email address is heppell@uchicago.edu, and his phone number is 733-702-0758.

5. Sam Heppell is duly licensed and admitted to practice law in the State of Illinois and is a member in good standing of the Illinois Bar. Mr. Heppell has paid the required fee to the State Bar of Michigan for temporary admission. (See attached Affidavit, Certificate of Good Standing from the Illinois Bar and Pro Hac Vice Application Receipt from the Michigan State Bar.)

6. The undersigned states the following:

- a. I have read the affidavit of Sam Heppell and supporting documentation.
- b. I have made a reasonable inquiry concerning the averments made in the attached affidavit and believe the out-of-state attorney's representations to be true.
- c. I agree to ensure that the procedures of Michigan Court Rule 8.126 are followed.

7. I respectfully request that Sam Heppell be admitted as counsel of record for Soulardarity and We Want Green, Too in Case Number U-21534.

Local Counsel for Soulardarity and  
We Want Green, Too

Date: May 8, 2024

By: /s/ Amanda Urban  
Amanda Urban (P-80915)  
Attorney  
(269) 254-0590  
t-9aurba@lawclinic.uchicago.edu

**AFFIDAVIT IN SUPPORT OF  
MOTION FOR ADMISSION *PRO HAC VICE***

Sam Heppell, being sworn, states the following:

1. I am a Clinical Teaching Fellow in the Abrams Environmental Law Clinic at the University of Chicago, in Chicago, Illinois. I have taught and practiced in this capacity since November 2023. Prior to that, I practiced from 2015 to 2023 at a civil rights law firm in Chicago, Illinois, representing individuals and classes of individuals in Illinois state court and federal courts across the country.
2. I am a 2014 graduate of Harvard Law School.
3. I have been licensed to practice law in the State of Illinois since 2015 and I am a member in good standing of the Illinois bar. I have been admitted to practice in numerous federal courts, including the Courts of Appeals for the Seventh, Ninth, and Fifth Circuits, and the District Courts for Northern, Central, and Southern Districts of Illinois, Northern and Southern Districts of Indiana, Eastern District of Wisconsin, and Western District of Texas.
4. I have represented Soulardarity, Urban Core Collective, and We Want Green, Too in case U-21291. I am co-counseling with counsel, and am working on behalf of the Abrams Environmental Law Clinic who has participated in the following MPSC proceedings on behalf of Soulardarity, Urban Core Collective, and/or We Want Green, Too: U-21297, U-21193, and U-21172, U-21090, U-21224, U-18232, U-20733, U-20162, U-20561, U-20471, U-21015, U-20713, and U-20851.
5. I have represented and currently represent various other organizations and individuals in federal and state courts.
6. I have not been disbarred, suspended, or denied admission in any jurisdiction.

7. I have not been denied *pro hac vice* status in Michigan, nor has such status been revoked in Michigan.

8. I am not the subject of any pending disciplinary action.


9. Attached are the following documents in support of my admission *pro hac vice* in Michigan:

- a) Certificate of Admission to the Bar of Illinois from the Clerk of the Supreme Court of the State of Illinois, confirming that I am currently in good standing.
- b) Receipt from the State Bar of Michigan, acknowledging receipt of the required fee to seek temporary admission.

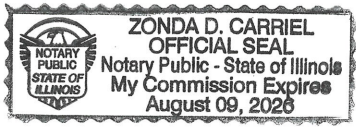
10. I am familiar with the Michigan Rules of Professional Conduct, Michigan Court Rules, and Michigan Rules of Evidence, and consent to the jurisdiction of the Michigan attorney disciplinary system.

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

Date: May 8, 2024

  
\_\_\_\_\_  
Sam Heppell

State of Illinois	
County of <u>COOK</u>	
Signed (or subscribed or attested) before me on <u>05.08.24</u> (date) by	
<u>Sam Heppell</u>	(name of person).
(seal)	
<u>Zonda D. Carriel</u>	
signature of notary public	



# Certificate of Admission To the Bar of Illinois

I, Cynthia A. Grant, Clerk of the Supreme Court of Illinois, do hereby certify that

D. Samuel Heppell

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 11/05/2015 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto  
subscribed my name and affixed the  
seal of said Court, this 11th day of  
April, 2024.

*Cynthia A. Grant*

Clerk,  
Supreme Court of the State of Illinois



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

## Pro Hac Vice Application Receipt

David Samuel Heppell  
6020 S University Ave  
Chicago, IL 60637-2704  
United States  
heppell@uchicago.edu

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) (mailto:ProHacVice@michbar.org) as soon as practicable.

Your payment was charged to credit card: \*\*\*\*\*0139

Payment Date: 05/08/2024

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) (mailto:ProHacVice@michbar.org).

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

Case No. U-21534

ALJ Sally Wallace

**PROOF OF SERVICE**

I, Amanda Urban, certify that an electronic copy of **Motion for Admission Pro Hac Vice of Sam Heppell as Counsel of Record on Behalf of Souldarity and We Want Green, Too** was served on the following on May 8, 2024.

Name/Party	E-mail Address
<b>Administrative Law Judge</b> Hon. Sally Wallace	<a href="mailto:wallaces2@michigan.gov">wallaces2@michigan.gov</a>
<b>DTE Electric Company</b> Jon P. Christinidis Paula Johnson-Bacon John A. Janiszewski Andrea E. Hayden Breanne K. Reitzel	<a href="mailto:jon.christinidis@dteenergy.com">jon.christinidis@dteenergy.com</a> <a href="mailto:paula.bacon@dteenergy.com">paula.bacon@dteenergy.com</a> <a href="mailto:john.janiszewski@dteenergy.com">john.janiszewski@dteenergy.com</a> <a href="mailto:andrea.hayden@dteenergy.com">andrea.hayden@dteenergy.com</a> <a href="mailto:breanne.reitzel@dteenergy.com">breanne.reitzel@dteenergy.com</a> <a href="mailto:mpscfilings@dteenergy.com">mpscfilings@dteenergy.com</a>
<b>Michigan Attorney General</b> Joel King	<a href="mailto:ag-enra-spec-lit@michigan.gov">ag-enra-spec-lit@michigan.gov</a> <a href="mailto:kingj38@michigan.gov">kingj38@michigan.gov</a>
<b>Michigan Public Service Commission Staff</b> Monica M. Stephens Amit T. Singh Heather M.S. Durian Michael J. Orris Lori Mayabb	<a href="mailto:stephensm11@michigan.gov">stephensm11@michigan.gov</a> <a href="mailto:singha9@michigan.gov">singha9@michigan.gov</a> <a href="mailto:durianh@michigan.gov">durianh@michigan.gov</a> <a href="mailto:orrism@michigan.gov">orrism@michigan.gov</a> <a href="mailto:mayabbl@michigan.gov">mayabbl@michigan.gov</a>
<b>The City of Ann Arbor, Michigan Municipal Association for Utility Issues</b> Valerie Jackson Valerie J.M. Brader	<a href="mailto:valeriejackson@rivenoaklaw.com">valeriejackson@rivenoaklaw.com</a> <a href="mailto:valerie@rivenoaklaw.com">valerie@rivenoaklaw.com</a>
<b>Michigan Environmental Council, Citizens Utility Board of Michigan, Natural Resources Defense Council, Sierra Club</b>	

<p>Christopher M. Bzdok Tracy Jane Andrews Breanna Thomas</p>	<p><a href="mailto:chris@tropospherelegal.com">chris@tropospherelegal.com</a> <a href="mailto:tjandrews@tropospherelegal.com">tjandrews@tropospherelegal.com</a> <a href="mailto:breanna@envlaw.com">breanna@envlaw.com</a></p>
<p><b>Michigan Energy Innovation Business Council, Institute for Energy Innovation, Advanced Energy United, The Foundry Association of Michigan, and Energy Michigan, Inc.</b> Laura A. Chappelle Justin K. Ooms Timothy J. Lundgren</p>	<p><a href="mailto:lchappelle@potomaclaw.com">lchappelle@potomaclaw.com</a> <a href="mailto:jooms@potomaclaw.com">jooms@potomaclaw.com</a> <a href="mailto:tlundgren@potomaclaw.com">tlundgren@potomaclaw.com</a></p>
<p><b>The Ecology Center, The Environmental Law &amp; Policy Center, Union of Concerned Scientists, and Vote Solar</b> Nicholas Wallace Daniel Abrams Alondra Estrada Carolyn Boyce</p>	<p><a href="mailto:nwallace@elpc.org">nwallace@elpc.org</a> <a href="mailto:dabrams@elpc.org">dabrams@elpc.org</a> <a href="mailto:astrada@elpc.org">astrada@elpc.org</a> <a href="mailto:cboyce@elpc.org">cboyce@elpc.org</a> <a href="mailto:MPSCdocket@elpc.org">MPSCdocket@elpc.org</a></p>
<p><b>The Kroger Company</b> Kurt J. Boehm Jody Kyler Cohn Justin Bieber Michael L. Kurtz</p>	<p><a href="mailto:kboehm@bkllawfirm.com">kboehm@bkllawfirm.com</a> <a href="mailto:jkylercohn@bkllawfirm.com">jkylercohn@bkllawfirm.com</a> <a href="mailto:jbieber@energystrat.com">jbieber@energystrat.com</a></p>
<p><b>Local 223, Utility Workers Union of America (UWUA), AFL-CIO</b> Benjamin King</p>	<p><a href="mailto:bking@michworkerlaw.com">bking@michworkerlaw.com</a></p>
<p><b>Association of Businesses Advocating Tariff Equity (ABATE)</b> Stephen A. Campbell</p>	<p><a href="mailto:scampbell@clarkhill.com">scampbell@clarkhill.com</a></p>
<p><b>EVgo Services, LLC</b> Nikhil Vijaykar</p>	<p><a href="mailto:nvijaykar@keyesfox.com">nvijaykar@keyesfox.com</a></p>
<p><b>Great Lakes Renewable Energy Association (GLREA)</b> Don L. Keskey Brian W. Coyer</p>	<p><a href="mailto:donkeskey@publiclawresourcecenter.com">donkeskey@publiclawresourcecenter.com</a> <a href="mailto:bwcoyer@publiclawresourcecenter.com">bwcoyer@publiclawresourcecenter.com</a></p>
<p><b>International Transmission Company</b> Courtney F. Kissel Richard J. Aaron Olivia R.C.A. Flower Hannah E. Buzolits</p>	<p><a href="mailto:ckissel@dykema.com">ckissel@dykema.com</a> <a href="mailto:raaron@dykema.com">raaron@dykema.com</a> <a href="mailto:oflower@dykema.com">oflower@dykema.com</a> <a href="mailto:hbuzolits@dykema.com">hbuzolits@dykema.com</a></p>
<p><b>Michigan Cable Telecommunications Association</b> Sean P. Gallagher</p>	<p><a href="mailto:sgallagher@fraserlawfirm.com">sgallagher@fraserlawfirm.com</a></p>

<b>PROTEC (The Michigan Coalition to Protect the Public Rights of Way)</b> Michael J. Watza	<a href="mailto:mike.watza@kitch.com">mike.watza@kitch.com</a>
<b>Walmart, Inc.</b> Melissa M. Horne	<a href="mailto:mhorne@hcc-law.com">mhorne@hcc-law.com</a>
<b>Soulardarity and We Want Green, Too</b> Amanda Urban Mark Templeton Jacob Schuhardt Sam Heppell Madison S. Wilson	<a href="mailto:t-9aurba@lawclinic.uchicago.edu">t-9aurba@lawclinic.uchicago.edu</a> <a href="mailto:templeton@uchicago.edu">templeton@uchicago.edu</a> <a href="mailto:jschuhardt@uchicago.edu">jschuhardt@uchicago.edu</a> <a href="mailto:heppell@uchicago.edu">heppell@uchicago.edu</a> <a href="mailto:madisonswilson@uchicago.edu">madisonswilson@uchicago.edu</a> <a href="mailto:aclc_mpsc@lawclinic.uchicago.edu">aclc_mpsc@lawclinic.uchicago.edu</a>

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

Date: May 8, 2024

Local Counsel for Soulardarity and  
We Want Green, Too

By: /s/ Amanda Urban  
Amanda Urban (P-80915)  
Attorney  
(269) 254-0590  
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