

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 Jacob R. Schuhardt as Counsel of Record on Behalf of Soulardarity and We Want Green, Too;
- Affidavit of Jacob R. Schuhardt 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

**MOTION FOR ADMISSION *PRO HAC VICE*
OF JACOB R. SCHUHARDT 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 Jacob R. Schuhardt 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. Jacob R. Schuhardt 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 jschuhardt@uchicago.edu, and his phone number is 733-702-7198.

5. Jacob R. Schuhardt 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. Schuhardt 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 Jacob R. Schuhardt 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 Jacob R. Schuhardt 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***

Jacob R. Schuhardt, being sworn, states the following:

1. I am a Fellow in the Abrams Environmental Law Clinic at the University of Chicago, in Chicago, Illinois. I have taught and practiced in this capacity since April 2023.

2. I am a 2019 graduate of Harvard Law School.

3. I have been licensed to practice law in the State of Illinois since 2020 and I am a member in good standing.

4. I have represented Urban Core Collective in cases U-21389 and U-21291. I have represented Soulardarity 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 Urban Core Collective, Soulardarity, and/or We Want Green Too in cases U-21090, U-21224, U-18232, U-20733, U-20162, U-20561, U-20471, U-21015, U-20713, U-20851, U-21297, U-21193, and U-21172. I have represented and currently represent various other organizations in federal and state courts and regulatory proceedings.

5. I have not been disbarred, suspended, or denied admission in any jurisdiction.

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 I have not been denied *pro hac vice* status in Michigan, nor has such status been revoked in Michigan.

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

8. 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.

9. 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

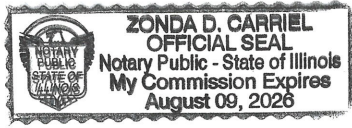


Jacob R. Schuhardt

State of Illinois
County of COOK

Signed (or subscribed or attested) before me on 05.08.24 (date) by
Jacob R. Schuhardt (name of person).

(seal)
Zonda D. Carriel
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

Jacob Russell Schuhardt

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 05/07/2020 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

Jacob Schuhardt
600 N Dearborn St Apt 806
Chicago, IL 60654-6287
United States
jschuhardt@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) 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).

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 Jacob R. Schuhardt as Counsel of Record on Behalf of Souldardarity and We Want Green, Too** was served on the following on May 8, 2024.

Name/Party	E-mail Address
Administrative Law Judge Hon. Sally Wallace	wallaces2@michigan.gov
DTE Electric Company Jon P. Christinidis Paula Johnson-Bacon John A. Janiszewski Andrea E. Hayden Breanne K. Reitzel	jon.christinidis@dteenergy.com paula.bacon@dteenergy.com john.janiszewski@dteenergy.com andrea.hayden@dteenergy.com breanne.reitzel@dteenergy.com mpscfilings@dteenergy.com
Michigan Attorney General Joel King	ag-enra-spec-lit@michigan.gov kingj38@michigan.gov
Michigan Public Service Commission Staff Monica M. Stephens Amit T. Singh Heather M.S. Durian Michael J. Orris Lori Mayabb	stephensm11@michigan.gov singha9@michigan.gov durianh@michigan.gov orrism@michigan.gov mayabb1@michigan.gov
The City of Ann Arbor, Michigan Municipal Association for Utility Issues Valerie Jackson Valerie J.M. Brader	valeriejackson@rivenoaklaw.com valerie@rivenoaklaw.com
Michigan Environmental Council, Citizens Utility Board of Michigan, Natural Resources Defense Council, Sierra Club	

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

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

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

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