



Jon P. Christinidis
(313) 235-7706
jon.christinidis@dteenergy.com

July 18, 2024

Joel B. King
Assistant Attorney General
MI Department of Attorney General
P.O. Box 30755
Lansing, MI 48909

RE: 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
MPSC Case No. U-21534

Dear Mr. King:

Attached for electronic filing in the above captioned matter is DTE Electric Company's Second and Final Partial Response (AGDE-3.90c, 98b, 98d, 99b, 99d, 100b, 100d, 101, 103c, 104b-d, 115ai and 125c-d) to the Attorney General's Third Discovery Request. Some of the attachments and discovery response AGDE-3.90c contain confidential information that is only being disclosed to the parties who executed non-disclosure certificates pursuant to the Protective Order. The attachments and confidential response are being provided to the respective parties via the following links listed below:

Public Portal Link: [U-21534 Electric Rate Case - Public Discovery - All Documents](#)

Confidential Portal Link: [U-21534 Electric Rate Case - Protected Responses](#)

Also attached is the Proof of Service.

Very truly yours,

Jon P. Christinidis

JPC/erb
Attachments

cc: Service Lists

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

PROOF OF SERVICE

STATE OF MICHIGAN)
) ss.
COUNTY OF WAYNE)

ESTELLA R. BRANSON states that on July 18, 2024, she served a copy of DTE Electric Company’s Second and Final Partial Response (AGDE-3.90c, 98b, 98d, 99b, 99d, 100b, 100d, 101, 103c, 104b-d, 115ai and 125c-d) to the Attorney General’s Third Discovery Request in the above captioned matter, via electronic mail and portal links, upon the persons listed on the attached service lists.

ESTELLA R. BRANSON

MPSC Case No. U-21534

Service List

Page 1

ABATE

Michael J. Pattwell
Clark Hill PLC
212 E. Cesar E. Chavez Avenue
Lansing, MI 48906
mpattwell@clarkhill.com

Stephen A. Campbell
Clark Hill PLC
500 Woodward Avenue, Suite 3500
Detroit, MI 48226
scampbell@clarkhill.com

ABATE Consultant

Brian C. Andrews
James R. Dauphinais
Christopher C. Walters
Jessica York
bandrews@consultbai.com
jdauphinais@consultbai.com
cwalters@consultbai.com
jyork@consultbai.com

ADVANCED ENERGY UNITED; ENERGY MICHIGAN, INC.; FOUNDRY ASSOCIATION OF MICHIGAN; INSTITUTE FOR ENERGY INNOVATION; MICHIGAN ENERGY INNOVATION BUSINESS COUNCIL

Laura A. Chappelle
Timothy J. Lundgren
Justin K. Ooms
Potomac Law Group PLLC
120 N. Washington Square, Suite 300
Lansing, MI 48933
lchappelle@potomaclaw.com
tlundgren@potomaclaw.com
jooms@potomaclaw.com

Justin Barnes
jbarnes@eq-research.com

MICHIGAN EIBC/IEI/UNITED

Laura Sherman
laura@mieibc.org

CITIZENS UTILITY BOARD OF MICHIGAN; MICHIGAN ENVIRONMENTAL COUNCIL; NATURAL RESOURCES DEFENSE COUNCIL; SIERRA CLUB

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

Breanna Thomas, Legal Assistant
breanna@tropospherelegal.com

Consultants:

Josh Denzler
Julielyn Gibbons
David Gard
Douglas Jester
Matt Bandyk
Paul Alvarez
Dennis Stephens
jdenzler@5lakesenergy.com
jgibbons@5lakesenergy.com
dgard@5lakesenergy.com
djester@5lakesenergy.com
mbandyk@5lakesenergy.com
palvarez@wiredgroup.net
dennis.stephens@hotmail.com

CITY OF ANN ARBOR

Valerie J.M. Brader
Rivenoak Law Group P.C.
3331 W. Big Beaver Rd., Suite 109
Troy, MI 48084
valerie@rivenoaklaw.com
ecf@rivenoaklaw.com

Valerie Jackson
Assistant City Attorney
City of Ann Arbor
Guy C. Larcom City Hall
301. E. Huron Street
Ann Arbor, MI 48104
Vjackson@a2gov.org

City of Ann Arbor Consultant:

Richard J. Bunch
rick@mi-maui.org

ELECTRIFY AMERICA, LLC

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

Stephen Bright
Electrify America, LLC
1950 Opportunity Way, Suite 1500
Reston, Virginia 20190
Steve.Bright@electrifyamerica.com

Rhiannon Davis
Jigar Shah
Rhiannon.Davis@electrifyamerica.com
Jigar.Shah@electrifyamerica.com

ENVIRONMENTAL LAW AND POLICY CENTER; ECOLOGY CENTER; UNION OF CONCERNED SCIENTISTS; VOTE SOLAR

Daniel Abrams
Nicholas Wallace
James Gignac
Will Kenworthy
Brad Klein
Lee Shaver
Boratha Tan
Curt Volkman
Environmental Law & Policy Center
35 E. Wacker Drive, Suite 1600
Chicago, IL 60601
dabrams@elpc.org
nwallace@elpc.org
jgignac@ucsusa.org
will@votesolar.org
bklein@elpc.org
lshaver@ucsusa.org
btan@votesolar.org
curt@newenergy-advisors.com

Sydney White, Legal Intern
Carolyn Boyce, ELPC Paralegal
Alondra Estrada, ELPC Legal Assistant
swhite@elpc.org
cboyce@elpc.org
astrada@elpc.org
MPSCDocket@elpc.org

EVGO SERVICES, LLC

Nikhil Vijaykar
Keyes & Fox LLP
580 California Street, 12th Floor
San Francisco, CA 94104
nvijaykar@keyesfox.com

Michael G. Oliva
Foster Swift Collins & Smith, PC
313 S. Washington Square
Lansing, MI 48933-2193
moliva@fosterswift.com

Alicia Zaloga, Paralegal
Lindsey Stegall
azaloga@keyesfox.com
Lindsey.Stegall@evgo.com

GREAT LAKES RENEWABLE ENERGY ASSOCIATION INC.

Don L. Keskey
Brian W. Coyer
University Office Place
333 Albert Avenue, Suite 425
East Lansing, MI 48823
donkeskey@publiclawresourcecenter.com
bwcoyer@publiclawresourcecenter.com

John Freeman
Bridget Corwin
John Richter
jfreeman13@comcast.net
bcorwin@umich.edu
johnarichter@pm.me

**INTERNATIONAL TRANSMISSION
COMPANY**

Richard J. Aaron
Courtney F. Kissel
Olivia R.C.A. Flower
Hannah E. Buzolits
201 Townsend Street, Suite 900
Lansing, MI 48933

RAaron@dykema.com

CKissel@dykema.com

OFlower@dykema.com

HBuzolits@dykema.com

THE KROGER COMPANY

Michael L. Kurtz
Kurt J. Boehm
Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202

mkurtz@BKLawfirm.com

KBoehm@BKLawfirm.com

JKylerCohn@BKLawfirm.com

Kroger Consultant

Justin Bieber

jbieber@energystrat.com

MICHIGAN ATTORNEY GENERAL

Joel King
Assistant Attorney General
ENRA Division
525 W. Ottawa Street, 6th Floor
P.O. Box 30755
Lansing, MI 48909
KingJ38@michigan.gov
ag-enra-spec-lit@michigan.gov

AG Consultant

Seb Coppola

sebcoppola@corplytics.com

**MICHIGAN CABLE
TELECOMMUNICATIONS ASSOC.;
ZECO SYSTEMS, INC. D/B/A
GREENLOTS**

Sean P. Gallagher
Fraser Trebilcock Davis & Dunlap
124 West Allegan Street, Suite 1000
Lansing, MI 48933

sgallagher@fraserlawfirm.com

Justin Mann, Legal Assistant

jmann@fraserlawfirm.com

**MICHIGAN MUNICIPAL
ASSOCIATION FOR UTILITY ISSUES**

Valerie J.M. Brader
Rivenoak Law Group P.C.
3331 W. Big Beaver Rd., Suite 109
Troy, MI 48084

valerie@rivenoaklaw.com

Linda Hofrichter

Rick Bunch

lh@rivenoaklaw.com

rick@mi-maui.org

MPSC STAFF

Heather M.S. Durian
Michael J. Orris
Amit T. Singh
Monica M. Stephens
7109 West Saginaw Hwy, 3rd Floor
Lansing, MI 48917

durianh@michigan.gov

orrism@michigan.gov

singha9@michigan.gov

stephensm11@michigan.gov

Lori Mayabb

MPSC Staff Case Coordinator

mayabbl@michigan.gov

MPSC Case No. U-21534

Service List

Page 4

SOULARDARITY; WE WANT GREEN, TOO

Mark Templeton
Amanda Urban
Jacob Schuhardt
Sam Heppell
Boris Lukanov
Joseph Amdur
Claire Black
Michelle David
Jason Frey
Andrew Kieffer
Ellie Maltby
Andrew Obeso
Ivy Truong
Jesse Bernes-Zieve
Josh Bretthauer
Sara Macedo
Serendipity Welsh
Adriel Ghadoushi
University of Chicago Law School
Abrams Environmental Law Clinic
6020 South University Avenue
Chicago, IL 60637
templeton@uchicago.edu
t-9aurba@lawclinics.uchicago.edu
jschuhardt@uchicago.edu
heppell@uchicago.edu
blukanov@psehealthyenergy.org
aelc_mpsc@lawclinic.uchicago.edu

Justin Schott
jbschott@umich.edu

Madison S. Wilson, Legal Assistant
madisonswilson@uchicago.edu

UTILITY WORKERS LOCAL 223

Ben King
3950 W. 11 Mile Road
Berkley, MI 48072
bking@michworkerlaw.com

WAL-MART

Melissa M. Horne
Higgins, Cavanagh & Cooney, LLP
10 Dorrance Street, 4th Floor
Providence, RI 02903
mhorne@hcc-law.com

ABATE

Michael J. Pattwell
Clark Hill PLC
212 E. Cesar E. Chavez Avenue
Lansing, MI 48906
mpattwell@clarkhill.com

Stephen A. Campbell
Clark Hill PLC
500 Woodward Avenue, Suite 3500
Detroit, MI 48226
scampbell@clarkhill.com

ABATE Consultant

Brian C. Andrews
James R. Dauphinais
Christopher C. Walters
Jessica York
bandrews@consultbai.com
jdauphinais@consultbai.com
cwalters@consultbai.com
jyork@consultbai.com

**CITIZENS UTILITY BOARD OF
MICHIGAN; MICHIGAN
ENVIRONMENTAL COUNCIL;
NATURAL RESOURCES DEFENSE
COUNCIL; SIERRA CLUB**

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

Breanna Thomas, Legal Assistant
breanna@tropospherelegal.com

Consultants:

David Gard
Douglas Jester
Matt Bandyk
Paul Alvarez
Dennis Stephens
Josh Denzler
Julielyn Gibbons

dgard@5lakesenergy.com
djester@5lakesenergy.com
mbandyk@5lakesenergy.com
palvarez@wiredgroup.net
dennis.stephens@hotmail.com
jdenzler@5lakesenergy.com
jgibbons@5lakesenergy.com

City of Ann Arbor Consultant:

Richard J. Bunch
rick@mi-maui.org

ELECTRIFY AMERICA, LLC

Stephen Bright
Rhiannon Davis
Jigar Shah
Steve.Bright@electrifyamerica.com
Rhiannon.Davis@electrifyamerica.com
Jigar.Shah@electrifyamerica.com

EVGO SERVICES, LLC

Michael G. Oliva
Foster Swift Collins & Smith, PC
313 S. Washington Square
Lansing, MI 48933-2193
moliva@fosterswift.com

**ENVIRONMENTAL LAW AND POLICY
CENTER; ECOLOGY CENTER; UNION
OF CONCERNED SCIENTISTS; VOTE
SOLAR**

Daniel Abrams
Nicholas Wallace
James Gignac
Will Kenworthy
Brad Klein
Lee Shaver
Boratha Tan
Curt Volkman
Environmental Law & Policy Center
35 E. Wacker Drive, Suite 1600
Chicago, IL 60601
dabrams@elpc.org
nwallace@elpc.org
jgignac@ucsusa.org
will@votesolar.org
bklein@elpc.org

MPSC Case No. U-21534

NDA Service List

Page 2

lshaver@ucsusa.org

btan@votesolar.org

curt@newenergy-advisors.com

Carolyn Boyce, ELPC Paralegal
Alondra Estrada, ELPC Legal Assistant

cboyce@elpc.org

astrada@elpc.org

GREAT LAKES RENEWABLE ENERGY ASSOCIATION INC.

Don Keskey

University Office Place

333 Albert Avenue, Suite 425

East Lansing, MI 48823

donkeskey@publiclawresourcecenter.com

John Freeman

Bridget Corwin

John Richter

jfreeman13@comcast.net

bcorwin@umich.edu

johnrichter@pm.me

INTERNATIONAL TRANSMISSION COMPANY

Richard J. Aaron

Courtney F. Kissel

Olivia R.C.A. Flower

Hannah E. Buzolits

201 Townsend Street, Suite 900

Lansing, MI 48933

RAaron@dykema.com

CKissel@dykema.com

OFlower@dykema.com

HBuzolits@dykema.com

MICHIGAN ATTORNEY GENERAL

Joel King

Assistant Attorney General

ENRA Division

525 W. Ottawa Street, 6th Floor

P.O. Box 30755

Lansing, MI 48909

KingJ38@michigan.gov

Amanda Churchill

ChurchillA1@michigan.gov

AG Consultant

Seb Coppola

sebcoppola@corplytics.com

MICHIGAN ENERGY INNOVATION BUSINESS COUNCIL

Justin Barnes

jbarnes@eq-research.com

MICHIGAN ENERGY INNOVATION BUSINESS COUNCIL; INSTITUTE FOR ENERGY INNOVATION; ADVANCED ENERGY UNITED; ENERGY MICHIGAN, INC.; THE FOUNDRY ASSOCIATION OF MICHIGAN

Laura A. Chappelle

Timothy J. Lundgren

Justin K. Ooms

Potomac Law Group PLLC

120 N. Washington Square, Suite 300

Lansing, MI 48933

lchappelle@potomaclaw.com

tlundgren@potomaclaw.com

jooms@potomaclaw.com

MICHIGAN EIBC/IEI/UNITED

Laura Sherman

laura@mieibc.org

MPSC STAFF

Heather M.S. Durian

Michael J. Orris

Amit T. Singh

Monica M. Stephens

7109 West Saginaw Hwy, 3rd Floor

Lansing, MI 48917

durianh@michigan.gov

orrism@michigan.gov

singha9@michigan.gov

stephensm11@michigan.gov

MPSC Staff

Lori Mayabb

Lisa M. Kindschy

Marceline Champion

Jon DeCoomen

MayabbL@michigan.gov

KindschyL@michigan.gov

championm1@michigan.gov

decoomanj@michigan.gov

**SOULARDARITY; WE WANT GREEN,
TOO**

Mark Templeton

Amanda Urban

Jacob Schuhardt

Sam Heppell

Boris Lukanov

Joseph Amdur

Claire Black

Michelle David

Jason Frey

Andrew Kieffer

Ellie Maltby

Andrew Obeso

Ivy Truong

Jesse Bernes-Zieve

Josh Bretthauer

Sara Macedo

Serendipity Welsh

Adriel Ghadoushi

University of Chicago Law School

Abrams Environmental Law Clinic

6020 South University Avenue

Chicago, IL 60637

templeton@uchicago.edu

t-9aurba@lawclinics.uchicago.edu

jschuhardt@uchicago.edu

heppell@uchicago.edu

blukanov@psehealthyenergy.org

Justin Schott

jbschott@umich.edu

Madison S. Wilson, Legal Assistant

madisonswilson@uchicago.edu