



THE UNIVERSITY OF CHICAGO
THE LAW SCHOOL
Abrams Environmental
Law Clinic

July 26, 2024

Via E-Filing

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

RE: MPSC Case No. U-21534

Dear Ms. Felice:

Please find enclosed the Direct Testimony of Elizabeth Jacob on Behalf of Soulardarity and We Want Green, Too and Accompanying Exhibit DAO-301, along with proof of service for electronic filing in the above-referenced matter. Please do not hesitate to contact me with any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark N. Templeton'.

Mark N. Templeton, *pro hac vice*
6020 S. University Avenue
Chicago, IL 60637
Phone: (773) 702-9611
Email: templeton@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) Case No. U-21534
increase its rates, amend its rate schedules)
and rules governing the distribution and) ALJ Sally L. Wallace
supply of electric energy, and for)
miscellaneous accounting authority.)

DIRECT TESTIMONY OF ELIZABETH JACOB

ON BEHALF OF

**DETROIT AREA ADVOCACY ORGANIZATIONS
(SOULARDARITY AND WE WANT GREEN, TOO)**

July 26, 2024

1 **I. INTRODUCTION**

2 **Q: Please state your name, business address, and occupation.**

3 **A:** My name is Elizabeth (Liz) Jacob (she/her/hers), and my business address is 4606 Cass
4 Avenue, Detroit, Michigan 48201. I am employed as a Skadden Fellow and Staff
5 Attorney at the Sugar Law Center for Economic and Social Justice.

6

7 **Q: On whose behalf are you testifying?**

8 **A:** I am testifying on behalf of Solidarity and We Want Green Too—collectively known as
9 the Detroit Area Advocacy Organizations (DAAO) in this proceeding.

10

11 **Q: Please describe your work experience and professional qualifications.**

12 **A:** I have a bachelor’s degree in sustainability marketing and environmental science and
13 policy from the College of William and Mary in Williamsburg, VA, and a juris doctorate
14 from the Yale Law School in New Haven, CT. I am licensed to practice law in the state
15 of Michigan.

16

17 **Q: Please describe your current professional work and its relevance to this case.**

18 **A:** The Sugar Law Center for Economic and Social Justice is a non-profit law firm that
19 provides free legal services to support low-income workers, their families, and
20 communities as they stand up and stand together for a fuller realization of their economic
21 and social rights. At the Sugar Law Center, I provide environmental and energy justice
22 legal services to low-income clients in the metro Detroit area. In my practice, I provide
23 direct legal services to low-income families to address a range of issues with DTE

1 Energy. To date, I have served more than 100 clients, all of which are low-income
2 households and the vast majority of which are households of color. Most of the legal
3 services I provide enforce customers' rights with respect to DTE Energy affordability and
4 collection issues, billing issues, shut-offs, and outages. While the services I provide
5 depend on each client's specific needs and the facts of their individual case, I have helped
6 dozens of families enroll in state utility assistance programs, negotiate payment
7 agreements with DTE Energy, resolve billing issues, avoid or navigate a shut-off of gas
8 and electric service, and receive compensation from DTE Electric following an extended
9 power outage.

10
11 **Q: What is the purpose of your testimony?**

12 **A:** The purpose of my testimony is to provide my direct experience as a legal services
13 provider to ratepayers struggling with affordability and collections issues with DTE
14 Electric. I will also address specifically some of the claims of DTE Electric Witness
15 Hatsios regarding requested IT Capital investments.

16
17 **Q: Have you provided testimony in a Michigan Public Service Commission (MPSC or**
18 **Commission) case before?**

19 **A:** While I have represented clients in proceedings before the Commission as described
20 above, I have not provided testimony in a Commission case such as this.

1 **Q: Are you sponsoring any exhibits?**

2 **A:** Yes, one.

3 DAO-301. U-21534 DTE Electric's Response to DAAO's Third Discovery Request,
4 DAADODE-3.10a through 3.10d.

5
6 **II. Low-Income Issues**

7 **Q: What is your overall perspective on the effectiveness of DTE Energy's various**
8 **programs and systems for supporting energy-burdened customers?**

9 **A:** While providing direct legal services to more than a hundred low-income clients, I have
10 been shocked and dismayed by how few DTE Energy programs and resources there are to
11 address adequately the needs of energy-burdened customers. When I conduct an intake
12 appointment with a new client, I am often floored to learn that they spend hundreds of
13 dollars on their monthly DTE Energy bills. So many low-income families are dismayed
14 to receive ever-increasing DTE Energy bills each month, even as they do everything they
15 can to limit their use of electricity and keep their homes at barely livable temperatures. In
16 fact, many of my clients are spending upwards of 40% of their household monthly
17 income on their combined DTE Electric and Gas bills.

18 Despite their best efforts to reduce energy consumption and stick to a monthly
19 budget, my clients—like so many low-income customers—are trapped in a cruel cycle of
20 unaffordable energy. Many low-income DTE Energy customers face greater energy
21 burdens since they reside in older, energy-inefficient homes and live in utility-redlined
22 neighborhoods as DTE Energy has not invested in grid and line updates equitably within
23 low-income communities and communities of color in metro Detroit. The energy burdens

1 of low-income customers are exacerbated by quickly rising DTE Electric and Gas rates
2 that make it impossible for them to catch up and keep up with their bills.

3 Most of my clients are within 150 to 200% of the Federal Poverty Limit, and so
4 they are not only struggling with their DTE Energy bills, but they are also juggling the
5 compounded and rising costs of food, water, transportation, housing, and other basic
6 necessities. I have heard from far too many clients that they are making impossible
7 choices each month to prioritize paying their DTE Energy bills instead of paying their
8 rent on time or buying food for their families. My clients, like thousands of other low-
9 income customers throughout DTE Electric's service territory, are facing a crisis of
10 energy affordability that is being compounded by other systemic social and economic
11 harms.

12 In the face of this crisis, DTE needs to treat energy-burdened customers with
13 dignity, respect, and empathy. DTE also needs to provide them with accessible support
14 that allows them to keep on critically needed gas and electric services. However, time and
15 time again, I have seen DTE Electric's programs and systems provide abysmal support
16 for energy-burdened customers. Below, I detail some specific examples that underscore
17 how ineffective, insufficient, and inadequate DTE Electric's programs and systems are to
18 support low-income customers.

19
20 **Q: Is DTE Energy capable of managing challenging customer issues?**

21 **A:** No. Dozens of the clients I serve have complex or unusual issues with DTE Energy.
22 For instance, I have helped numerous clients navigate investigations with DTE Electric
23 regarding a meter malfunction, meter destruction, or meter theft issue. These issues

1 typically require an extended conversation with DTE customer service representatives to
2 understand the issue, coordinate and send an in-person DTE service crew to investigate a
3 meter issue, and then take the appropriate follow-up steps to rectify the meter issue. At
4 present, long call wait times, lack of consistent processes for customer representatives to
5 address complicated meter issues, and inconsistent follow-up with customers result in
6 DTE Energy not managing these challenging meter issues efficiently or effectively.
7 Moreover, despite DTE Electric's ongoing investments in digital self-service, many of
8 my clients have faced billing errors that create undue stress and anxiety for their
9 households to navigate. Issues like wrongful charges or other billing errors should be
10 straightforward to process, yet slow follow-up from customer service representatives and
11 a lack of clear resolution procedures can result in DTE Energy taking several weeks to
12 resolve these challenging customer issues. Still other clients have had issues with
13 DTE Electric-caused property damage, identity theft or fraud, or wrongly merged
14 residential and commercial DTE accounts. These types of issues can be complex and
15 require input from several different divisions within DTE Energy. DTE Energy often
16 struggles to effectively manage and coordinate across the Company to develop solutions
17 for these complex problems. As a result of DTE Electric's inefficient system of managing
18 complex or unique customer problems, these kinds of issues can take undue time, energy,
19 and effort on the part of the consumer to resolve.

20
21 **Q: Is it difficult to understand and navigate DTE Energy programs?**

22 **A:** Yes. Many of my clients have not completed high school and are not digitally or
23 technologically literate. Additionally, several of my clients have limited English

1 proficiency. I have seen firsthand how difficult it is for these clients to understand what
2 steps they should take when they fall behind on a bill or receive a notice for service
3 disconnection due to non-payment. When talking to DTE customer service
4 representatives on the phone, they may get helpful information, but more likely than not,
5 they are just met with cold indifference from customer representatives who simply
6 demand that my clients pay their bills as soon as possible. For many low-income, energy-
7 burdened customers with simply no financial resources, paying their full bill may just not
8 be an option.

9 While there are limited DTE Energy programs and governmental resources to
10 support low-income customers with affordability challenges, these programs are difficult
11 to understand, hard to navigate, and harder still to successfully access. The inability to
12 access DTE Energy programs and utility assistance programs falls the hardest on
13 customers with lower levels of educational attainment, English proficiency, and digital
14 literacy. DTE customer service representatives and digital self-service tools should be
15 centered on providing accessible and understandable information to all customers.
16 However, as will be detailed below, the lack of transparency in DTE Energy processes
17 and the lack of clear and accessible information for DTE Energy programs to support
18 low-income customers make it even more difficult for these customers to navigate DTE
19 Energy systems and programs.

1 **Q: Does the cost of DTE Energy’s services and problems with its programs lead to**
2 **chronic affordability challenges and financial hardships for your clients?**

3 **A:** Yes. Dozens of my clients have high arrearages to DTE that have built up over months to
4 years of rising gas and electric costs. All my clients work diligently to pay off their bills
5 to the best of their abilities, even while they are struggling to make ends meet. For
6 customers with high arrearages, programs like DTE Energy’s Shut-Off Protection Plan or
7 Payment Agreements are simply inaccessible due to high, required down payments to
8 participate in such programs and unaffordable monthly program payments. Accessing
9 these programs requires a downpayment that is often between 10% and 50% of the
10 customer’s outstanding balance. For clients that have arrears upwards of \$1,000, paying a
11 downpayment of \$100 to \$500, on top of high monthly bills and other essential expenses,
12 is simply impossible.

13
14 **Q: Does DTE Energy impose unaccounted-for and seemingly unapproved costs on**
15 **financially struggling customers?**

16 **A:** Yes.

17 For many low-income families, consistently paying off each monthly DTE
18 Energy bill—which for many families can be several hundred dollars a month—is an
19 ongoing struggle. From losing a job to having a family emergency, unforeseen
20 circumstances will arise that cause households to miss a payment at times.

21 DTE Energy recently started a new practice of requiring customers who miss as
22 few as one payment or have a credit card or check payment returned for insufficient
23 funds to make their subsequent payments at a physical DTE kiosk or at one of DTE’s

1 authorized payment agents. Several of my clients were told by DTE customer service
2 representatives that since they had missed just one payment, they would be forced to
3 make their payments in cash at a DTE kiosk for the next 12 months.

4 While there are DTE kiosks located throughout metro Detroit, I have heard from
5 several clients that they do not have any DTE kiosks that are accessible to them via
6 walking or public transportation. Many of my clients do not own a car and lack consistent
7 and affordable access to public transportation. As a result, many of my clients have to
8 spend extra resources—resources that could have gone towards paying their outstanding
9 DTE Energy bill—to find and pay for transportation to a DTE kiosk. When they are
10 finally able to make it to a DTE kiosk, DTE then makes them pay an additional service
11 fee to use the DTE kiosk to make their cash payment! As a result, energy-burdened
12 customers who are already struggling to make their monthly payments are charged an
13 additional service fee—which, to my knowledge, was not approved by MPSC—for a full
14 year. In effect, DTE Energy is inequitably charging a higher rate for energy service to
15 these low-income and energy-burdened customers vis-à-vis a consistent additional
16 monthly fee, as compared to all other DTE customers.

17
18 **Q: Is there insufficient communication and coordination between DTE Energy and**
19 **utility assistance programs providers?**

20 **A.** Yes, the communication between DTE Energy and utility assistance program providers is
21 insufficient. While supporting clients to navigate state utility assistance programs, the
22 State Emergency Relief Program, and the Michigan Energy Assistance Program, I have
23 witnessed numerous communication issues between DTE Energy and utility assistance

1 providers. While the Michigan Department of Health and Human Services (MDHHS) and
2 Community Action Agencies, respectively, manage these programs and not DTE Energy,
3 there are often significant communication gaps between DTE Energy and these partners
4 that result in additional stress, administrative burden, and confusion to low-income
5 customers.

6 As one example, I spent more than five months supporting a client to get a State
7 Emergency Relief utility assistance payment accepted and received between the MDHHS
8 and DTE Energy. In my experience, this process typically takes a few weeks for a
9 customer's utility assistance payment to be sent by MDHHS and received by DTE.
10 However, in this instance, a communication breakdown between MDHHS and DTE
11 Energy caused the payment process to drag out for months. While there were many
12 administrative hurdles on the part of MDHHS, DTE Energy communicated sporadically,
13 did not prioritize the issue, and did not offer clear timelines, processes, or assistance to
14 resolve the issue. As thousands of DTE Energy customers receive financial assistance
15 from the State Emergency Relief program each year, this process should be routine and
16 uncomplicated for DTE Energy to manage. However, poor communication and
17 coordination between DTE Energy and the MDHHS resulted in numerous complications
18 and undue stress for a low-income customer.

19 Moreover, I supported another client who received a Michigan Energy Assistance
20 Payment from the Salvation Army to pay off a large portion of their DTE Energy arrears.
21 However, the payment sent from the Salvation Army to DTE Energy on the client's
22 behalf was not processed correctly. Accordingly, the payment was not recorded on the
23 client's account, and the client's arrears remained unchanged. Despite DTE Energy

1 knowing that its system did not process the payment, DTE did not notify either my client
2 or the Salvation Army of the payment issue. Accordingly, the customer made a payment
3 to DTE Energy for their actual gas and electric usage the next month, thinking that they
4 no longer had additional arrearages on their DTE Energy account. Instead, since DTE
5 Energy did not process the Salvation Army's payment correctly, their arrearages
6 continued to add up. As they had a past-due balance with DTE, they were at a continued
7 risk of shut-off despite having correctly navigated utility assistance programs to pay off
8 their arrears. Even with my support, they had to navigate several additional weeks of
9 unneeded back and forth between DTE Energy and the Salvation Army, which caused
10 them significant unnecessary stress and hardship to navigate and resolve the issue.

11 These examples illustrate the stressful impacts of DTE Energy's inability to create
12 a system of streamlined and open communication with utility assistance programs that
13 prioritizes and efficiently resolves the needs of low-income customers.

14
15 **Q: Are there specific problems with DTE Energy's Shut-Off Protection Program that**
16 **you would like to highlight?**

17 **A:** Yes. As background, DTE Energy's Shut-Off Protection Program (SPP) is a payment
18 agreement option solely for verified low-income customers to enter into a standard
19 monthly payment plan for 12 months that includes both their average monthly usage and
20 their past due balance. DTE may charge customers a "recalculation fee" if their actual
21 usage within a three-month period exceeds their average usage as estimated in their

1 monthly SPP payment. To participate in the SPP, customers must both submit income
2 verification documentation online and pay a down payment to DTE Energy.

3 In my experience supporting clients, DTE has required a down payment that is
4 often between 10 and 30% of the customer's outstanding balance. For clients that have
5 arrears upwards of \$1,000, paying a down payment of \$100 to \$300, on top of high
6 monthly SPP payments, can make the program inaccessible. Additionally, income
7 verification documentation must be submitted online via DTE Energy's Customer
8 Document Submission Portal. This portal can be very confusing and difficult to navigate
9 for customers with limited digital literacy and access to technology. What's more, the
10 documents required by DTE for low-income verification—(1) identification for the
11 account holder; (2) legal documents to verify the household size; (3) documentation of
12 household income—often times create barriers and burdens for clients to present. I have
13 spent considerable time supporting clients to track down necessary documents like tax
14 returns, birth certificates and social security cards and helping them learn how to upload
15 the documents online. It is important to note that many of my clients do not have access
16 to these specific legal documents for all of their family members, so despite being
17 eligible for this program based on their household size and income, they are not able to
18 participate.

19 Then, once a low-income customer's documents are successfully uploaded to
20 DTE Energy's document submission portal, it can take several days for DTE Energy to
21 contact the customer and provide them with details to enroll in the SPP. Since many
22 customers attempt to enroll in SPP once they receive a shut-off notice, they are working
23 on a quick timeline of ten days or less to enroll in the SPP and make a minimum

1 appropriate payment DTE to avoid a service disconnection. The delayed follow-up from
2 DTE Energy to share program details and enrollment information can add even more
3 stress and burden to the already stressful experience of receiving a notice of utility shut-
4 off.

5 Moreover, I have witnessed numerous customer experiences that illustrate the
6 serious shortfalls of this program even after a customer has finally enrolled in the SPP
7 program. For instance, I have seen clients fall behind on a payment in the SPP by just a
8 few days—for instance, due to an unforeseen crisis such as losing a job or getting into a
9 vehicular accident—and then DTE Energy immediately and unceremoniously removes
10 them from the payment program. Moreover, DTE Energy does not make clear enough to
11 clients when they enroll in the SPP program that DTE may charge them the
12 “recalculation fee;” many customers then are shocked to receive additional charges every
13 three months in the shut-off protection program. These additional recalculation fees make
14 it impossible for residents to budget effectively and stay up to date on their SPP payments
15 and often cause my clients to fall out of the program. Once they fall out of the SPP, they
16 typically need to work with DTE Energy either to pay another downpayment to rejoin the
17 program or, if DTE no longer provides them with the SPP option, to try and negotiate a
18 payment agreement. This can create an additional burden on customers to continually
19 navigate, enroll, and re-enroll in the SPP. These issues highlight how one of DTE’s
20 primary company-managed low-income payment programs falls far short of meeting the
21 needs of low-income customers.

1 **Q: Does DTE Energy follow the law with regard to how it negotiates the terms of**
2 **customer payment agreements?**

3 **A:** Based on my experience, DTE customer representatives often do not follow the law with
4 respect to negotiating Payment Agreements with low-income customers.

5 Under Mich. Admin. R. 460.146(1), if a customer claims that they cannot pay a
6 bill in full, “[a] utility shall establish a policy to allow a residential or small
7 nonresidential customer the opportunity to enter into a minimum of 2 documented
8 payment plans for an amount owed to the utility that is not in dispute, if a customer
9 claims an inability to pay in full.” *See* Mich. Admin. R. 460.146(1). Under Mich. Admin.
10 R. 460.146(2), DTE Energy, as a regulated utility, “shall not require the residential or
11 small nonresidential customer to pay more than a reasonable amount of the outstanding
12 bill upon entering into the plan, and not more than reasonable installments until the
13 remaining balance is paid.” The regulation further outlines that the parties shall consider
14 *all* the following factors to determine an appropriate payment agreement: (a) the size of
15 the delinquent account, (b) the customer’s ability to pay, (c) the time that the debt has
16 been outstanding, (d) the reasons that the customer has not paid the bill, (e) the
17 customer’s payment history, [and] (f) any other relevant factors concerning the
18 circumstances of the customer. *See* Mich. Admin. R. 460.146(2)(a)-(f).

19 However, in my experience supporting clients, DTE Energy rarely takes into real
20 consideration a customer’s needs or ability to pay when establishing a payment
21 agreement. At present, low-income customers cannot provide additional, relevant
22 information about their circumstances when trying to access a payment agreement on
23 DTE’s online webpage. So, calling DTE Energy’s customer service phone line is the only

1 way to even attempt to negotiate a payment agreement. When negotiating a payment
2 agreement over the phone, I see time and time again how DTE Energy customer
3 representatives simply give a customer a computer-generated payment agreement with a
4 set amount already established for both down payment and monthly payments. When
5 pressed to negotiate with a customer, DTE Energy customer service representatives will
6 often state that they cannot make any changes to the agreement generated by the system
7 and tell a customer to take or leave the Payment Agreement on the spot.

8 Instead of working with customers to develop plans that both allow the customer
9 to pay off their balance with dignity and allow DTE Energy to recover the full amount
10 owed, DTE Energy pushes unsustainable Payment Agreements onto customers that many
11 cannot sustain, and accordingly, end up defaulting on. Once they default on these
12 agreements, low-income customers then continue, once again, to accrue arrears that only
13 make it more difficult for them to ever be able to pay off what DTE demands from them.
14 What's more, a regulated utility is not required under law to allow a customer to enter
15 into more than two Payment Agreements if they have defaulted on a Payment Agreement
16 within the last 12 months. *See Mich. Admin. R. 460.146(3)*. So, since a customer's ability
17 to even be able to enter into a Payment Agreement is so limited, having a negotiated and
18 appropriate Payment Agreement that the customer can actually afford to stay in and keep
19 making payments is critical. Without even the limited benefit of a Payment Agreement,
20 customers are once again at immediate risk of service disconnection and the ongoing
21 problem of ever-growing arrears. This toxic cycle traps customers struggling with
22 affordability or collections issues.

1 **Q: Is it important for DTE Electric to offer phone service to customers undergoing**
2 **affordability or collections issues?**

3 **A:** Yes. Many of the clients I serve do not have consistent access to technology or the
4 internet. Furthermore, many of my clients do not have the digital literacy or skills to be
5 able to even navigate a webpage or use a chatbot. So, for these customers facing
6 affordability or collections issues, their only option is a phone call to DTE Electric.

7
8 **Q: But have you found DTE Energy's phone service for customers undergoing**
9 **affordability or collections issues to be adequate?**

10 **A:** No. I have not found DTE Energy's phone service for customers undergoing affordability
11 or collections issues to be adequate.

12 One problem with DTE Energy's phone service is that the length of wait times is
13 often excessive. In my experience supporting clients, I have found that DTE Energy's
14 call wait times can range from a few minutes to several hours. When I must wait several
15 hours with a client to get through to DTE Energy during a high-volume time, I see how
16 these lengthy wait times add additional stress to a client's already stressful affordability
17 or collection issue. Furthermore, many of my clients are working one or more jobs and
18 taking care of family members, all of which make it difficult for them to be able to stay
19 on the line during a long wait time. While DTE Energy does offer a feature where the
20 system will call back a customer when they are at the front of the phone queue, it can be
21 very difficult for working customers to be available for a callback that will only come
22 from 8 a.m. to 5 p.m. when DTE Energy's Residential Assistance phone line is in
23 operation. Regardless of whether one chooses to stay on the line or requests a callback,

1 DTE Energy does offer some estimates of the anticipated wait times for a phone call to be
2 received by their customer representatives; however, these estimates can vary greatly and
3 make it difficult to plan a work or personal schedule around.

4 These persistent struggles with getting on the phone with a DTE Energy customer
5 service representative result in many customers just giving up entirely on their call and
6 not working to resolve their issue. Insufficient staffing and investment in the customer
7 service phone line creates numerous challenges for customers, which especially burdens
8 low-income customers within limited time and capacity.

9 A further inadequacy of DTE Energy's phone service is how often customer
10 service representatives do not treat my clients and customers like them with respect or
11 dignity when they are attempting to navigate an affordability or collections issue. Clients
12 have told me that they have shared traumatic experiences and personal stories as to why
13 they need a payment deadline extension or a Payment Agreement with customer service
14 representatives, expecting to be heard and received with grace and understanding.
15 Instead, they have received cold and, at times, painful responses from DTE customer
16 service representatives. Clients have shared that DTE customer service representatives
17 have not listened to their experiences and provided them with only computer-generated
18 standard payment agreements or formulaic verbal responses that do not provide evidence
19 that a customer service representative heard and understood their needs.

20 Another problem is the lack of or inconsistency of information customers receive
21 from DTE customer service representatives. My clients have emphasized that DTE
22 customer service representatives have not directed them to the appropriate state utility
23 assistance programs (i.e., the State Emergency Relief Program or the Michigan Energy

1 Assistance Program) or DTE's Shut-Off Protection Program, even when they may be
2 eligible for such programs. Further, I have had numerous clients tell me that they will talk
3 to one DTE customer service representative and receive information, and then, the next
4 time they call DTE, there is no record of that conversation. Instead, they are instead told
5 entirely different information from a different customer service representative. This
6 creates confusion, mistrust, and apprehension in my clients and undermines their
7 reasonable expectations that DTE Energy will provide them with reliable information and
8 assistance.

9 In my experience, I have found that when I join a call with a client as their
10 authorized representative and attorney, there is a markedly different amount of respect
11 and consideration shown to the client's issue. For instance, when I call on behalf of a
12 client or join a client on the phone with DTE customer representatives, they are far more
13 likely to discuss and negotiate Payment Agreement options and highlight all the programs
14 that a customer is eligible for. All DTE customers are deserving of respect and should be
15 treated with dignity on a phone call, and it should not require the presence of an attorney
16 or authorized representative to yield such treatment.

17
18 **Q: Have you found DTE Electric's digital self-service tools for collections and**
19 **affordability issues to be responsive to the needs of your clients and customers like**
20 **them?**

21 **A:** No.

22 As mentioned above, many low-income customers, senior citizens, and people
23 with disabilities, among other energy-burdened customers, have limited digital and

1 technological literacy skills. Further, given this low level of technological and digital
2 literacy, even when my clients may have access to the internet, they are not able to open,
3 use, or navigate DTE Electric's self-service digital tools for collections and affordability
4 issues. In the absence of digital literacy education and skill-building, these customers
5 have immense difficulty even opening and navigating a website.

6 For the clients I serve who are digitally literate, many cannot afford computers or
7 even internet service at their homes. So, the only way that they can access DTE Electric's
8 digital self-service tools is by traveling to a public space with free internet access and free
9 computers to use, such as a library or community center. This puts an additional burden
10 on customers to find, travel, and potentially pay to be able to access the internet or a
11 computer, even as some may not have the skills and abilities to use those tools once they
12 are able to travel to them. As DTE Electric pushes more and more customers to digital
13 self-service solutions, I have had even more residents reach out to my office with
14 confusion about how to log into a DTE Electric customer account on their phone or
15 computer, to communicate with a chatbot, to find their bills online, or to make an online
16 payment.

17 As discussed above, customers who fall behind and miss even one payment to
18 DTE Electric are being asked to provide cash payments at DTE kiosks. Per Witness
19 Hatsios's testimony, DTE considers these physical DTE kiosks where low-income
20 customers are being forced to make cash payments to be a digital self-service tool.¹ For
21 those customers who have missed or defaulted on one payment, DTE has made it
22 impossible for them to access DTE's other digital self-service tools from their phone or

¹ Hatsios Direct Testimony at 38.

1 computer to make payments on these bills online. Instead, they are being forced to find,
2 travel, and pay an additional fee to utilize DTE’s other so-called “digital” self-service
3 tool: a physical kiosk that they must insert cash payments into. Witness Hatsios notes in
4 his testimony that upgrading “the Payment Kiosk to accept payments on customer
5 accounts that were disconnected for non-payment” is a “significant example” of the kinds
6 of collection enhancements DTE Electric hopes to make in the future.² This example
7 illustrates how low-income customers are *already* suffering from *more* collections and
8 affordability issues from DTE Electric’s existing investments in digital self-service tools.
9 This is illustrative of how DTE Electric’s investments in digital-self service tools are
10 quite literally making it more difficult and burdensome for low-income customers to be
11 able to make payments in a cost-effective and timely manner.

12 Furthermore, DTE Electric’s IT infrastructure is accessible to customers who are
13 not proficient English speakers or readers. As DTE Electric’s digital self-service tools are
14 available in only English,³ they can be very difficult for non-English speakers and readers
15 to use and access. I have heard from many non-English speaking clients that it can be
16 difficult— on top of the aforementioned difficulties of using technology—to navigate
17 DTE’s automated emails, text messages, or voice prompts.

18 Lastly, DTE’s automated emails, text messages, and voice prompts often have
19 outdated or inaccurate information. For instance, funding for the 2023-2024 State
20 Emergency Relief utility assistance program ran out of funding on June 15, 2024, and the
21 MDHHS provides no other funding for utility assistance. Yet, as recently as July 12,

² *Id.* at 57.

³ Ex. DAO-301. U-21534 DTE Electric’s Response to DAAO’s Third Discovery Request, DAADODE-3.10a.

1 2024, DTE still sent automated messages to newly verified low-income customers that
2 informed them to contact MDHHS for emergency financial assistance to pay their DTE
3 bills. The outdated and inaccurate information provided by DTE Electric’s digital self-
4 service tools only further burdens and confuses low-income customers.

5
6 **III. DTE’s Proposed Capital Investments**

7 **Q: What is DTE Electric’s request for IT Capital related to collections?**

8 **A:** I understand that DTE Electric is requesting recovery of \$10.7 million of IT Capital for
9 Collection digital self-service.⁴

10
11 **Q: What do you understand to be DTE Electric’s stated justification for IT Capital
12 related to collections?**

13 **A:** I understand from Witness Hatsios’s Direct Testimony that the “capital allocated to the
14 Collection digital self-service solutions is intended to enhance the Company’s existing
15 Collection digital solutions, and to expand the number of available digital solutions.”⁵
16 Witness Hatsios states that Collection Digital Improvements include “providing the
17 ability for customers to enroll in a payment arrangement on Web to pay their past due
18 amount over time”⁶

19

⁴ Hatsios Direct Testimony at 20-21.

⁵ *Id.* at 21.

⁶ *Id.* at 22.

1 **Q: What is your overall reaction to DTE’s proposal?**

2 **A:** While reviewing Witness Hatsios’s testimony, I was stunned at how DTE Electric’s
3 proposed investments in digital self-service tools for collections were focused almost
4 entirely on DTE Electric’s own costs and improving its financial metrics. DTE Electric is
5 proposing to make the already stressful collections process more automated, more
6 inequitable, no more accessible to non-English speakers, and less responsive to the needs
7 of energy-burdened customers while increasing the amount of capital on which its
8 shareholders may receive returns.⁷

9 Glaringly absent from Witness Hatsios’s testimony were meaningful actions to
10 address the root causes of customer payment issues, which are the reason that such
11 collection measures are needed in the first place. These IT Capital Investments do not
12 provide additional resources or support to families who are struggling to afford their
13 monthly DTE Energy bills or to address the enormous economic and social burdens on
14 low-income families. Witness Hatsios himself notes that many of DTE Electric’s
15 customers are facing significant affordability challenges, including high energy burdens,
16 economic insecurity, and the ongoing impacts of the COVID-19 pandemic.⁸ Witness
17 Hatsios correctly observes that relative to 2022, in 2023 there was a 15% reduction in

⁷ Witness Hatsios responded to DAAO discovery requests about what languages DTE Energy would add as part of the IT Capital Investments and what studies DTE had conducted about the languages used by its customers that “Digital Self-Service options are currently offered only in English.” Ex. DAO-301. U-21534 DTE Electric’s Response to DAAO’s Third Discovery Request, DAADODE-3.10a through 3.10d. Through these responses, DTE Energy admits it is not concerned with its non-English-reading customers’ ability to access these digital tools.

⁸ Hatsios Direct Testimony at 23.

1 available Energy Assistance funding and an increase in shutoff notices from 1.9 million
2 to 2.1 million.⁹

3 With even more households struggling to afford the rising costs of DTE Electric’s
4 service, far more consideration should be given to whether the Energy Assistance
5 programs that DTE’s digital self-service tools will be sharing information about have
6 adequate funding to serve eligible low-income customers. In 2024, the State Emergency
7 Relief (SER) program ran out of money on June 15, 2024, over three and a half months
8 earlier than the program’s September 30 expiration date. Providers of the Michigan
9 Energy Assistance Program (MEAP)— which is supplemental state utility assistance
10 funding that can only be accessed with an approved SER award, unless the SER program
11 has expired, in which case customers can apply directly for MEAP funding, as happened
12 in June 2024—have stopped accepting new applications in the metro-Detroit region. With
13 state assistance programs out of funding for over a quarter of the year, there is limited use
14 for increased investments in digital self-service tools that share automated information
15 about assistance programs that low-income customers cannot even apply for or access.
16 The fact that Energy Assistance programs are running out of money as customer need is
17 skyrocketing further underscores how DTE’s Electric’s proposal to invest more in IT
18 Capital misses the mark of what low-income customers urgently need: more affordable
19 and less expensive electricity.

20 In my experience working with over a hundred low-income families to navigate
21 their issues with DTE Energy, I would argue that DTE Electric customers are facing
22 more than challenges—they are facing an energy affordability crisis that is threatening

⁹ *Id.*

1 the health and well-being of families. While Witness Hatsios claims that these digital
2 self-service tools will include options for customers to enroll in payment plans or receive
3 information about assistance programs, he makes no mention of how these programs will
4 be improved, designed, or implemented to ensure they are meeting the needs of low-
5 income and energy burdened customer populations.¹⁰ DTE’s proposed IT investments do
6 nothing fundamentally to make electric services more affordable, consistent, or reliable
7 for my clients and customers like them.

8
9 **Q: What is your response to Witness Hatsios’ discussion of Collection call volumes and**
10 **claim that savings for ratepayers as a whole will be achieved?**

11 **A:** Witness Hatsios makes sweeping, and likely incorrect, assertions about how the
12 Company’s past investments in IT have helped reduce collections call volumes while
13 customers’ needs for assistance have increased. Witness Hatsios notes that there were
14 50,000 fewer collection calls in 2023 compared to 2022¹¹ and that “collection call
15 volumes are not materially different than they were four or five years ago.”¹² He notes
16 further that in 2023 there was “an 11% increase in the number of active low-income
17 customers versus 2022, a 28% increase in the number of low income customers who
18 reached final arrears status, a 15% reduction in available Energy Assistance (EA)
19 funding, and an increase in shutoff notices from 1.9 million to 2.1 million.”¹³ Witness
20 Hatsios concludes that “the Company maintains that the expected increase in Collection
21 inquiry calls, was mitigated by a reduction in the number of calls from customers who

¹⁰ *Id.* at 21-22.

¹¹ *Id.* at 23.

¹² *Id.*

¹³ *Id.*

1 chose to use a digital solution to restore service, to enroll in a payment agreement, or to
2 check on the status of an account hold.”¹⁴ In effect, Witness Hatsios argues that, while
3 investments in digital self-service collection tools will incur costs, the investments will
4 ultimately save ratepayers money by reducing call volumes and the expenses the
5 Company incurs from calls.

6 However, from Witness Hatsios’s testimony, it is not at all clear why call volumes
7 have decreased while the number of low-income customers who have reached final
8 arrears status and the number of shut offs have both increased. While Witness Hatsios
9 argues that the fact that DTE Electric call volumes have not increased is due to
10 investments in digital self-service tools, there are many other plausible and reasonable
11 explanations for this phenomenon.

12 For instance, Witness Hatsios’ discussion ignores the fact that many customers
13 call DTE’s phone line and are dismayed and discouraged by the long wait times that
14 force them off the phone. If they then unsuccessfully try to use a digital tool to take
15 action for an issue that requires more individualized support from a customer service
16 representative, the customer may fall further behind on their bills or find themselves in
17 even more complicated issues because they were not able to resolve their issues quickly
18 and efficiently. As a result of not being able to have their needs met by DTE Energy
19 customer service representatives, customers may not be making as many calls as they
20 have in the past to resolve their issues and avoid shut off of their energy services.

21 Consequently, these customers may now be falling into avoidable and unnecessary
22 shutoffs because DTE Energy was not able and equipped to best meet their needs. In this

¹⁴ *Id.*

1 way, fewer calls could actually be *contributing* to the higher number of shutoffs as
2 customers were not able to get their issues resolved appropriately to avoid disconnection
3 of their services.

4 In addition, the Collection Digital Improvements do not adequately provide
5 customers with the ability to communicate with DTE the circumstances of their unique
6 situation and reach a payment agreement that they can afford. As previously discussed,
7 Mich. Admin. R. 460.146(2) outlines considerations that DTE must consider when
8 negotiating a payment agreement with a customer. Having better access to digital tools
9 does not solve the problem that DTE personnel need to assess each person's situation
10 individually to offer them a tailored suite of solutions. A fundamental issue with Witness
11 Hatsios's claim is that while digital self-service tools may provide additional options to
12 customers, they are not a sufficient replacement for phone service. The fact that there has
13 not been a marked reduction in call volumes over the last four years underscores that
14 even as digital systems are improved, there will continue to be customers who either need
15 or choose to resolve their issues via phone, whether because they have a complex
16 affordability problem that requires more personalized support or because they do not
17 have the digital literacy to use an online tool.

18 The fact remains that customers—including low-income customers—require both
19 call and digital services tools. However, DTE Electric must reorient these investments
20 away from maximizing corporate efficiency and returns to shareholders and instead
21 towards prioritizing consumer needs, access, and reliability.

1 **Q: In light of the issues faced by customers, what is your reaction to the fact that**
2 **increasing capital expenditures for digital self-service increases returns for DTE’s**
3 **shareholders?**

4 **A:** DTE Electric’s increasing investments in IT Capital increase returns to shareholders at
5 the expense of vulnerable ratepayers. By making these investments, DTE Energy is again
6 prioritizing profit-motivated investments over providing the level of customer service and
7 investments in affordable and reliable electricity service that my clients and customers
8 like them desperately need. In extolling the benefits of these IT Capital investments,
9 Witness Hatsios makes little to no mention of corresponding efforts to reduce energy
10 burdens, prevent or even minimize disconnection due to nonpayment, or improve
11 satisfaction and service for customers facing affordability and collections issues.

12

13 **IV. Recommendations**

14 **Q: In your experience, what improvements to DTE Electric’s digital or call service**
15 **tools are needed to serve ratepayers better?**

16 **A:** As highlighted above, DTE Electric’s call service and digital tools are rife with systemic
17 issues that must be addressed to better respond to the needs of low-income customers.
18 This Commission should engage low-income customers, organizations that serve them,
19 and other relevant community stakeholders to identify the improvements that would best
20 meet their needs based on their lived experiences.

1 Based on my experience, I recommend the following improvements to DTE
2 Electric's Call Service Tools:

- 3 • Hire more customer service staff to be able to reduce call wait times and
4 provide better service to customers;
- 5 • Train customer service staff on all DTE systems and programs to support low-
6 income customers;
- 7 • Train customer service staff on the requirements of Mich Admin. R. 460.146
8 so that staff can effectively and lawfully negotiate payment agreements with
9 low-income customers;
- 10 • Improve reporting requirements for calls so that all customer calls and the
11 content discussed are documented, tracked, and accessible during future calls;
12 and
- 13 • Outline clear guidelines and train customer service staff on how to treat all
14 customers—regardless of race, ethnicity, age, income, or any other identity—
15 with dignity and respect.

16 Based on my experience, I recommend the following improvements to DTE
17 Electric's Digital Self-Service Tools:

- 18 • Provide low-income DTE Electric customers with free internet services to be
19 able to access digital self-service tools;
- 20 • Translate digital self-service tools into the languages spoken by DTE
21 customers. Translation must meet the needs of non-English speaking
22 customers and should include meaningful considerations of different
23 languages and dialects spoken in communities in DTE Energy's service

1 territory, culturally appropriate language, and other cultural considerations in
2 the translation of materials.

- 3 • Update digital self-service tools to be more accessible to people with limited
4 digital literacy. One example could be updating digital self-service tools to
5 include simpler, more streamlined, and easier to access information related to
6 common customer issues like billing, affordability information, payment, and
7 frequently asked questions to make these tools more accessible. Moreover,
8 this digital content could be updated to feature more graphics, visual, and
9 video explanations and less written text to make content more accessible and
10 understandable to customers with literacy challenges. Further, closed captions
11 on videos, alt-text for pictures and video content, and adding audio
12 descriptions on web pages could make digital content more accessible.
13 Moreover, assistive technology, such as screen magnifiers, the ability to have
14 content read out loud, video resources, and voice commands, could also make
15 these tools more accessible. Further, hosting in-person digital literacy
16 trainings in communities across DTE Electric’s service territory would
17 provide opportunities to increase residents’ digital literacy understanding and
18 skills using specifically DTE Electric digital self-service tools. Offering
19 digital literacy coaching and support via DTE Energy’s phone service would
20 also be a way to meet customers where their skill levels are at and provide
21 individualized support. Additionally, a tracking system on a customer account
22 where a customer could easily access all the calls, chat messages, emails, and
23 mailed notices that DTE has sent them would allow customers to better

- 1 understand and track what information DTE is sending to them across
2 platforms and channels;
- 3 • End the practice of requiring customers who miss or default a payment to
4 make all payments at a DTE Kiosk for twelve months;
 - 5 • Ensure that all DTE Electric digital self-service tools are accessible in the
6 languages and dialects spoken by DTE customers; and
 - 7 • Ensure that DTE Electric digital self-service tools have to-date and accurate
8 information at all times.

9

10 **Q: Would these improvements address your fundamental concerns?**

11 **A:** While these recommended improvements would make a marked difference for
12 ratepayers, it is imperative to underscore that none of these improvements will address
13 the core issue: that DTE electric rates are unaffordable for their customers. DTE Electric
14 should certainly treat customers with respect and provide them with the information that
15 they need, and the convenience and efficiency of payment collection will undoubtedly
16 lead to cost savings and revenue benefits for DTE. However, these improvements do not
17 address ever-increasing DTE Energy rates, more unaffordable bills, and the other
18 systemic economic and social inequities faced by my clients and customers like them.
19 This Commission should direct DTE Electric to focus resources and energy on improving
20 the reliability of their services and reducing costs for ratepayers.

21

1 **Q: What recommendations do you have for the Commission regarding affordability**
2 **and IT Capital Projects serving energy-burdened customers?**

3 **A:** DTE Electric’s focus on automation and efficiency in collections is yet another example
4 that the company could not be further from understanding the needs of its most
5 vulnerable low-income and energy-burdened customers. DTE is forcing ratepayers to pay
6 for the company to deploy even more aggressive, automated, and inaccessible collection
7 practices against vulnerable customers. These increased investments in collections come
8 without similar investments from DTE Electric in affordability, reliability, consistency,
9 or customer service.

10 I am dismayed that DTE Electric is once again prioritizing using ratepayer funds
11 to exacerbate the already-dangerous crisis of collections related shut-off to increase
12 capital expenditures. Electricity must be seen by this Commission as a basic necessity to
13 live a healthy, safe, and fulfilling life. As such, this Commission must not allow DTE
14 Electric to continue to profit at the expense of low-income ratepayers. Allowing DTE
15 Electric to increase rates to cover costs like these yet again as inflation and rising
16 consumer goods costs continue to undermine the ability of low-income customers to pay
17 their bills is cruel and inhumane.

18 I implore the Commission to reject DTE Electric’s proposal to recover the \$10.7
19 million in costs associated with the Collections Digital Self-Service platform. The
20 Commission must also reject any other proposed IT investments from DTE Electric that
21 prioritize greater automation and efficiency at the expense of customer assistance,
22 affordability, and accessibility.

1 I urge the Commission to direct DTE Electric to focus investment and efforts on
2 programs and initiatives that meet and center the needs of low-income and energy-
3 burdened customers. These investments should include efforts to reduce energy burdens,
4 improve affordability, ameliorate dismal service issues, reduce high customer arrears, and
5 invest in the health and well-being of all customers.

6

7 **Q: Does this conclude your written Direct Testimony?**

8 **A:** Yes.

MPSC Case No: U-21534

Requester: DAAO

Question No.: DAAODE-3.10a

Respondent: M. Hatsios

Page: 1 of 1

Question: Will the IT Capital investments proposed in this case expand DTE Electric's digital self-service functionality to include languages other than English? If so, please:

- a. Identify each specific language in which digital self-service options will be offered.

Answer: No. Digital Self-Service options are currently offered only in English.

Attachment: None.

MPSC Case No: U-21534

Requester: DAAO

Question No.: DAAODE-3.10b

Respondent: M. Hatsios

Page: 1 of 1

Question: Will the IT Capital investments proposed in this case expand DTE Electric's digital self-service functionality to include languages other than English? If so, please:

- b. Describe in detail the process and criteria used by DTE Electric to determine which languages would be included in the expanded self-service offerings.

Answer: Please see response to DAAODE-3.10a.

Attachment: None.

MPSC Case No: U-21534

Requester: DAAO

Question No.: DAAODE-3.10ci

Respondent: M. Hatsios

Page: 1 of 1

Question: Will the IT Capital investments proposed in this case expand DTE Electric's digital self-service functionality to include languages other than English? If so, please:

- c. Provide any internal analyses, studies, or other documents assessing the language access needs of DTE Electric's customer base, including but not limited to:
- i. Data on the primary language spoken by customers in DTE Electric's service territory;

Answer: Please see response to DAAODE-3.10a.

Attachment: None.

MPSC Case No: U-21534

Requester: DAAO

Question No.: DAAODE-3.10cii

Respondent: M. Hatsios

Page: 1 of 1

Question: Will the IT Capital investments proposed in this case expand DTE Electric's digital self-service functionality to include languages other than English? If so, please:

- c. Provide any internal analyses, studies, or other documents assessing the language access needs of DTE Electric's customer base, including but not limited to:
- ii. Surveys or other research gauging customer interest in or need for non-English self-service options;

Answer: Please see response to DAAODE-3.10a.

Attachment: None.

MPSC Case No: U-21534

Requester: DAAO

Question No.: DAAODE-3.10ciii

Respondent: M. Hatsios

Page: 1 of 1

Question: Will the IT Capital investments proposed in this case expand DTE Electric's digital self-service functionality to include languages other than English? If so, please:

- c. Provide any internal analyses, studies, or other documents assessing the language access needs of DTE Electric's customer base, including but not limited to:
- iii. Benchmarking studies or comparisons to the multilingual offerings of other utilities.

Answer: Please see response to DAAODE-3.10a.

Attachment: None.

MPSC Case No: U-21534

Requester: DAAO

Question No.: DAAODE-3.10d

Respondent: M. Hatsios

Page: 1 of 1

Question: Will the IT Capital investments proposed in this case expand DTE Electric's digital self-service functionality to include languages other than English? If so, please:

- c. Provide any internal analyses, studies, or other documents assessing the language access needs of DTE Electric's customer base, including but not limited to:
- d. Produce all planning documents, implementation timelines, budgets and cost estimates related to the addition of multilingual capabilities to DTE Electric's digital self-service platforms.

Answer: Please see response to DAAODE-3.10a.

Attachment: None.

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, Mark N. Templeton, certify that an electronic copy of the Direct Testimony of Elizabeth Jacob and Accompanying Exhibit DAO-301, on Behalf of Soulardarity and We Want Green, Too was served on the following on July 26, 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 mayabbl@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
Electrify America, LLC Jennifer A. Morante Stephen Bright	jmorante@grsm.com steve.bright@electrifyamerica.com

<p>Michigan Environmental Council, Citizens Utility Board of Michigan, Natural Resources Defense Council, Sierra Club 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 Michael G. Oliva</p>	<p>nvijaykar@keyesfox.com moliva@fosterswift.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>

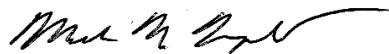
Michigan Cable Telecommunications Association Sean P. Gallagher	sgallagher@fraserlawfirm.com
PROTEC (The Michigan Coalition to Protect the Public Rights of Way) Michael J. Watza	mike.watza@kitch.com
Walmart, Inc. Melissa M. Horne	mhorne@hcc-law.com
Soulardarity and We Want Green, Too Amanda Urban Mark 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 aelc mpse@lawclinic.uchicago.edu

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

UNIVERSITY OF CHICAGO LAW SCHOOL
 ABRAMS ENVIRONMENTAL LAW CLINIC
 Counsel for Soulardarity and
 We Want Green, Too

Date: July 26, 2024

Sincerely,



Mark N. Templeton, *pro hac vice*
 6020 S. University Avenue
 Chicago, IL 60637
 Phone: (773) 702-9611
 Email: templeton@uchicago.edu