



Via Electronic Case Filing

July 26, 2024

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

**RE: Case No. U-21534**

Dear Executive Secretary Felice:

Please find attached the following for paperless filing in the above captioned matter.

Direct Testimony of Lindsey Stegall on behalf of EVgo Services, LLC  
EVgo Exhibit List  
Exhibit EVG-1 (LRS-1)  
Exhibit EVG-2 (LRS-2)  
Proof of Service

Thank you for your consideration.

Sincerely,

/s/ Nikhil Vijaykar

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CC: 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

**DIRECT TESTIMONY OF LINDSEY R. STEGALL**

**ON BEHALF OF EVGO SERVICES, LLC**

**JULY 26, 2024**

**TABLE OF CONTENTS**

**I. INTRODUCTION AND PURPOSE OF TESTIMONY ..... 1**

**II. BACKGROUND ON EV CHARGING INFRASTRUCTURE INCENTIVE PROGRAMS ..... 4**

**III. BUSINESS CHARGER REBATES ..... 7**

**IV. EV FAST CHARGER RATE ..... 16**

**V. CONCLUSION ..... 19**

1 **I. INTRODUCTION AND PURPOSE OF TESTIMONY**

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

3 A: My name is Lindsey R. Stegall, and I am a Senior Manager of Market Development and  
4 Public Policy at EVgo Services, LLC (“EVgo”). EVgo’s business address is 11835 W.  
5 Olympic Blvd. Suite 900E Los Angeles, CA 90064.

6 **Q: Have you prepared a statement of your experience and qualifications?**

7 A: Yes. My qualifications are included as Appendix A to this testimony.

8 **Q: On whose behalf are you testifying in this proceeding?**

9 A: I am testifying on behalf of EVgo. EVgo is a leader in electric vehicle (“EV”) charging  
10 solutions, building and operating the infrastructure and tools needed to expedite the mass  
11 adoption of EVs for individual drivers, rideshare and commercial fleets, and businesses.  
12 EVgo is one of the nation’s largest public fast charging providers, featuring over 1,000 fast  
13 charging locations across more than 35 states, including stations built through EVgo  
14 eXtend™, its white label service offering. EVgo is accelerating transportation  
15 electrification (“TE”) through partnerships with automakers, fleet and rideshare operators,  
16 retail hosts such as grocery stores, shopping centers, and gas stations, policy leaders, and  
17 other organizations.

18 Under its owner-operator business model, EVgo develops, finances, owns, and  
19 operates its fast-charging network. EVgo works with site host partners across the country  
20 to deploy EV charging solutions at retail locations that are already part of customers’ daily  
21 routines. EVgo installs the public direct current fast chargers (“DCFC”) at no cost to the  
22 site host partner. EVgo also maintains the customer relationship with the EV driver,  
23 providing a call center that is available to customers 24/7, and is responsible for operations  
24 and maintenance of its EV charging network. As of the end of the first quarter of 2024,

1 nearly 40% of EVgo’s fast charging stalls were powered by a 350kW charger—almost  
2 double the percentage a year ago—to best serve vehicle models with the most advanced  
3 battery technology and high peak charging speeds.

4 **Q: What is EVgo’s interest in this proceeding?**

5 **A:** EVgo is an active participant in the competitive market for DCFC in Michigan. EVgo  
6 currently owns and operates more than 40 fast-charging stalls in the state—all of which are  
7 in DTE Electric Company’s (“DTE” or “the Company”) service territory—and has plans  
8 for future expansion. EVgo takes into account several factors when identifying markets in  
9 which to develop DCFC, including state policies and regulations, utility make-ready and  
10 incentive programs, the competitive landscape, tariff designs, state and federal funding  
11 programs, and a number of other factors. The outcome of this proceeding will have a  
12 substantial impact on the nature, growth, and economics of the competitive market for  
13 DCFC in Michigan because DTE has proposed a suite of transportation electrification  
14 programs including a modified version of its existing “Business Charger Rebates”  
15 program. As a DTE customer, EVgo is also impacted by the rates DTE proposes or  
16 describes in its rate case application—including in particular a novel rate targeted at DCFC  
17 (“EV Fast Charger rate”). EVgo therefore has a substantial and direct interest in the  
18 outcome of this proceeding.

19 **Q: What is the purpose of your testimony?**

20 **A:** The purpose of my testimony is to provide the Commission and DTE with  
21 recommendations that will help ensure DTE’s transportation electrification programs  
22 maximize ratepayer benefits while accelerating the equitable deployment of EV charging

1 infrastructure in DTE’s service territory. In particular, I will discuss DTE’s Business  
2 Charger Rebates program and the EV Fast Charger rate DTE put forward for discussion.

3 **Q: At a high level, what is your reaction to DTE’s modified Business Charger Rebates**  
4 **program?**

5 A: DTE’s existing Business Charger Rebates program has been one of the most successful  
6 components of DTE’s broader “Charging Forward” EV program. EVgo participates in the  
7 Business Charger Rebates program and has supported the steady growth of that program  
8 in DTE’s recent rate cases.

9 In this case, DTE proposes a major modification to the Business Charger Rebates  
10 program: DTE proposes to limit the availability of incentives to chargers located near major  
11 throughways (also known as “corridor” locations) going forward and will no longer  
12 provide incentives to chargers in “destination” locations (also known as “community”  
13 locations) that are more than 1 mile from a major throughway. I am concerned this  
14 significant new limitation could result in the inequitable distribution of chargers in DTE’s  
15 service territory, especially for multifamily housing residents and others who rely on public  
16 charging. I am also concerned it could limit program participation.

17 **Q: At a high level, what is your reaction to the EV Fast Charger rate DTE described in**  
18 **its testimony?**

19 A: As DTE itself acknowledges, the EV Fast Charger rate described in DTE’s testimony was  
20 developed based on exceedingly limited data (21 customers). Implementing a rate based  
21 on the load data of 21 customers could have adverse effects on both individual customers  
22 and the industry more broadly. I agree with the Company’s assessment that the rate should  
23 not be implemented at the conclusion of this case.

1 **Q: Please summarize your recommendations to the Commission in this proceeding.**

2 A: I recommend the Commission:

- 3 • Direct the Company to support both corridor *and* community locations through the  
4 Business Charger Rebates program (similar to the scope of the existing program)  
5 and eliminate the requirement that participating sites be located “on-route” in both  
6 the DAC/rural and the non-DAC/rural subsegments of the program;
- 7 • Direct the Company to reallocate any funds remaining from the existing Business  
8 Charger Rebate program on December 31, 2024 into the non-DAC/rural  
9 subsegment of the proposed Business Charger Rebate program instead of allowing  
10 the utility to determine the reallocation of these funds at a later date; and
- 11 • Adopt DTE’s proposal to take no further action related to the EV Fast Charger rate  
12 at this time.

13 **Q: Do you sponsor any exhibits to your testimony?**

14 A: Yes. I sponsor the following exhibits to my testimony:

- 15 • Exhibit EVG-1 (LRS-1): Compiled discovery responses.
- 16 • Exhibit EVG-2 (LRS-2): EVgo and ChargePoint comments on DTE’s draft  
17 TEP.

18 **II. BACKGROUND ON EV CHARGING INFRASTRUCTURE INCENTIVE**  
19 **PROGRAMS**

20 **Q: What is the purpose of this section of your testimony?**

21 A: In this section of my testimony, I provide background on the role that utility EV DCFC  
22 infrastructure incentive programs can play in accelerating EV adoption and delivering  
23 benefits to ratepayers and society.

1 **Q: What is DCFC infrastructure?**

2 A: Public or commercial DCFC charges a vehicle’s battery using direct current at high power,  
3 which allows for fast charging in minutes instead of hours. DCFC is well-suited for quick  
4 charge needs in and around cities, towns, and suburbs and along high-traffic travel  
5 corridors. DCFC stations are located at or near places where drivers live, drive, and shop,  
6 including retail locations, restaurants, grocery stores, and other locations where an EV  
7 driver will be for 15-45 minutes. By contrast, Level 2 charging typically provides a full  
8 charge in 4 to 8 hours and is sought in longer duration, long dwell-time locations such as  
9 at workplaces, homes, amusement parks, or other destinations where drivers may spend  
10 several hours.

11 **Q: How does DCFC infrastructure drive EV adoption, especially for those without access**  
12 **to home charging?**

13 A: Public DCFC helps drive EV adoption—and therefore increases charging and electric  
14 load—by serving a variety of drivers’ needs. DCFC builds the range confidence of EV  
15 drivers, especially on trips between cities or across the country. DCFC locations serving  
16 this need are commonly known as “corridor” locations. Public DCFC plays an equally  
17 important role in dense, urban, and suburban areas where not every home has a driveway,  
18 attached garage, or in many cases, any dedicated parking. DCFC locations serving this  
19 need are commonly known as “community” locations. According to the International  
20 Council on Clean Transportation, apartment-dwelling EV drivers living in multifamily  
21 housing rely on public charging for 50-80% of their charging<sup>1</sup> as they typically do not have

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<sup>1</sup> International Council on Clean Transportation, *Quantifying the Electric Vehicle Charging Infrastructure Gap Across U.S. Markets* at 9 (Jan. 2019), available at [https://theicct.org/sites/default/files/publications/US\\_charging\\_Gap\\_20190124.pdf](https://theicct.org/sites/default/files/publications/US_charging_Gap_20190124.pdf).

1 access to dedicated parking or home charging. Thus, siting DCFC in community locations  
2 near multifamily housing and existing amenities drives EV adoption by providing charging  
3 options to drivers that do not own a single-family home. For this reason, deploying public  
4 DCFC in more dense metropolitan areas is key to enabling equity goals.

5 **Q: How do well-designed EV DCFC infrastructure incentive programs benefit utility**  
6 **ratepayers?**

7 A: Programs that defray the costs of deploying DCFC infrastructure foster private investment  
8 and drive the deployment of EV charging stations, which facilitate broader EV adoption  
9 and increased charging. Increased EV charging increases the utility’s electric load and  
10 thereby spreads system costs over a greater volume of customers, causing downward  
11 pressure on future rates.

12 These ratepayer benefits are not just theoretical. A 2024 study by Synapse  
13 Economics (“Synapse”) found that across all regions in the United States, EVs have  
14 increased utility revenues more than they have increased utility costs, leading to downward  
15 pressure on electric rates for EV-owners and non-EV owners alike. Between 2011 and  
16 2021, Synapse estimates that EV drivers across the country have contributed \$3.12 billion  
17 more in revenues than associated costs, driving rates down for all customers.<sup>2</sup> The Synapse  
18 report shows a positive cumulative net rate impact (revenues greater than costs) from  
19 electric vehicles in Michigan between 2011-2021.<sup>3</sup>

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<sup>2</sup> Sarah Shenstone-Harris, Paul Rhodes, Jason Frost, Ellen Carlson, Eric Borden, Courtney Lane, Melissa Whited. *Electric Vehicles Are Driving Rates Down for All Customers* at 3 (Jan. 2024).

<sup>3</sup> *Id.* at 5.

1 **Q: What are the other public interest benefits of well-designed EV charging**  
2 **infrastructure incentive programs?**

3 A: As the State of Michigan has recognized in its MI Healthy Climate Plan,<sup>4</sup> programs that  
4 effectively support accelerated TE can generate benefits for multiple stakeholders. EV  
5 drivers can benefit from reduced vehicle operating costs for EVs as compared to traditional  
6 vehicles. The state as a whole can benefit from reduced greenhouse gas emissions,  
7 improved air quality and associated health benefits, economic development, and job  
8 creation. The economic benefits of TE for ratepayers are widely recognized by utilities and  
9 public service commissions across the country.

10 **III. BUSINESS CHARGER REBATES**

11 **Q: Please describe DTE's existing Business Charger Rebates program.**

12 A: The Business Charger Rebates program is a core<sup>5</sup> and highly popular component of  
13 Charging Forward. Through the program, DTE issues rebates to business and commercial  
14 customers. Those rebates defray the costs of installing charging infrastructure. DTE  
15 provides rebates of up to \$55,000 per DCFC and \$2,000 per Level 2 port with no limitations  
16 with regard to the geography of participating sites.

17 **Q: Has the Business Charger Rebates program been successful in deploying EV chargers**  
18 **in DTE's service territory?**

19 A: Yes. The Business Charger Rebates program has been a critical factor contributing to the  
20 growth of EV charging station deployment in DTE's service territory. Historically, the  
21 program has been so popular that its funding has quickly been exhausted, and applicants

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<sup>4</sup> Michigan Department of Environment, Great Lakes and Energy, MI Healthy Climate Plan, April 2022, available at: <https://www.michigan.gov/egle/about/organization/climate-and-energy/mi-healthy-climate-plan>.

<sup>5</sup> Case No. U-21297, Direct Testimony of DTE witness Peterson at KP-41, lines 23-25.

1 have been waitlisted.<sup>6</sup> According to DTE, the program has led to the installation of 310  
2 sites with over 1,400 ports operational as of May 17, 2024. This is very near the Company’s  
3 previous target of 1,500 ports.<sup>7</sup> The Company also has 149 sites (593 ports) in the pipeline  
4 to receive funding through DTE Electric’s Business Charger Rebates program. DTE agrees  
5 the program has been successful.<sup>8</sup>

6 **Q: Please summarize DTE’s proposal in this proceeding with respect to the Business**  
7 **Charger Rebates program.**

8 A: In this proceeding, the Company proposes to impose geographic limitations on projects  
9 that may receive support from the Business Charger Rebates Program. In order to  
10 participate, sites must be in “on-route” locations. DTE defines “on route” as fast charging  
11 within one mile of a major throughway exit,<sup>9</sup> with major throughway referring to “a high-  
12 traffic road that is likely to be a limited access Interstate or State highway.”<sup>10</sup> DTE proposes  
13 to offer a rebate of \$70,000 per on-route DCFC in disadvantaged communities and rural  
14 areas and \$50,000 per on-route DCFC in other areas.<sup>11</sup> The Company proposes a budget of  
15 \$21.6 million in the DAC and rural on-route subsegment and \$15.4 million in other on-  
16 route areas.<sup>12</sup> Importantly, DTE proposes to eliminate incentives for DCFC “destination  
17 charging,” also known as community charging, despite the need to serve drivers who  
18 cannot charge at home.

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<sup>6</sup> Case No. U-20836, Direct Testimony of DTE witness Burns at BJHB-38.

<sup>7</sup> See Exhibit EVG-1 (LRS-1), DTE response to EVgoDE-1.4.

<sup>8</sup> See *id.*

<sup>9</sup> DTE testimony part 1 at PB-46:4-5.

<sup>10</sup> See Exhibit EVG-1 (LRS-1), DTE response to EVgoDE-1.5.

<sup>11</sup> DTE testimony part 1 at PB-46:6-9.

<sup>12</sup> *Id.* at PB-46:11-12.

1 **Q: Do you have any concerns with regard to DTE’s proposal to eliminate incentives for**  
2 **community DCFC?**

3 A: Yes. While I commend the Company for proposing to continue supporting the deployment  
4 of fast charging in its service territory, and while I support DTE’s proposal to allocate a  
5 portion of the available funding to DACs and rural areas, DTE’s proposal to limit eligibility  
6 to “on-route” locations concerns me. While “on-route,” locations are an important use case,  
7 limiting program support to these locations while excluding community locations could  
8 lead to unintended and adverse consequences. Specifically, this approach could result in  
9 inequitable outcomes by limiting charging opportunities for those without access to home  
10 charging and those in areas without a major corridor. This approach may also limit program  
11 participation. Further, the Company has not justified its proposal to narrow program  
12 eligibility. I will explain each of these concerns in detail below.

13 **Q: Please explain how DTE’s proposal to eliminate incentives for community DCFC**  
14 **could lead to inequitable outcomes related to access to public fast chargers in DTE’s**  
15 **service territory.**

16 A: If the private market is incented to deploy chargers only along major corridors (*i.e.*, on-  
17 route locations), the number of community charging sites may not keep pace with demand,  
18 leading to gaps in some urban and suburban areas. This would be concerning for multiple  
19 reasons. First, it would lead to fewer conveniently located chargers along EV drivers’ daily  
20 routes in community locations that may be more than one mile away from a corridor.  
21 Second, multifamily housing residents and renters rely on public DCFC in community  
22 locations to charge their vehicles, as this group of EV drivers typically does not have access  
23 to home charging. Prioritizing corridor charging over community charging may therefore

1 slow EV adoption among drivers that do not own single-family homes, all else equal.  
2 Again, I support DTE’s proposal to carve out funding for charging locations in DACs and  
3 rural areas, but by restricting that funding to “on-route” locations, DTE’s proposal may  
4 inadvertently reduce the number of DAC residents served by the program and may fail to  
5 achieve the program’s goal of breaking down barriers for low- and moderate-income  
6 customers and disadvantaged communities.<sup>13</sup>

7 **Q: Please explain how DTE’s proposal to eliminate incentives for community DCFC**  
8 **could reduce participation in the Business Charger Rebates program.**

9 A: DTE is proposing a \$37 million budget for this program over the TEP timeframe from 2025  
10 to 2028—an increase in annual budget compared to previous years. However, with  
11 additional program restrictions, it may be difficult to achieve the level of program  
12 participation DTE is expecting. There are many factors that must be considered in siting a  
13 charging station, such as traffic patterns, EV density, proximity of other DCFC,  
14 environmental justice considerations, multifamily housing proximity, amenities, and  
15 existing relationships with potential site hosts. Additional geographic requirements will  
16 further limit the pool of potential sites and may create a barrier to program participation.

17 **Q: Does the Company justify its proposal to eliminate incentives for community DCFC?**

18 A: Not adequately. In its direct testimony, DTE notes that “[r]eliable, on-route fast charging,  
19 defined as fast charging within one mile of a major throughway exit, can increase  
20 customer’s confidence in the refueling infrastructure.” The Company also states that it  
21 “does not, however, propose rebates for the destination charging segments as the  
22 economics of Level 2 charger deployment are not as challenging, and businesses have other

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<sup>13</sup> *Id.* at PB-14:24-25

1 motivation for installation such as increased foot traffic. For site hosts installing a  
2 destination DCFC, DTE Electric will continue to offer a commercially available rate  
3 without demand charges for sites less than one megawatt.”<sup>14</sup>

4 Further, in discovery, DTE states “[d]estination chargers, by definition, are located  
5 at businesses like hotels, restaurants, or grocery stores, that may not be located within one  
6 mile of a major throughway. In order to balance public charger support with overall  
7 customer affordability the Company considered that these businesses have other incentives  
8 and motivations for charger installation, like increasing foot traffic and attracting  
9 customers to their businesses. Therefore, the Company determined to direct finite  
10 incentives to locations with fewer such incentives and inherent benefits.”<sup>15</sup>

11 **Q: What are your concerns with this explanation?**

12 A: First, while the Company provides a reason for excluding Level 2 community charging  
13 locations from the program, it does not explain why it proposes to eliminate incentives for  
14 community DCFC locations. In discovery, DTE expands on this topic, suggesting that  
15 certain types of businesses located more than a mile from a major throughway may have  
16 other incentives and motivations for charger installation.<sup>16</sup> However, these same types of  
17 businesses—grocery stores, restaurants, and other retailers—can also be located *within* one  
18 mile of a major throughway. It is unclear why the incentives for installing chargers would  
19 differ for businesses based solely on their distance from a major throughway.

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<sup>14</sup> *Id.* at PB-47:1-6.

<sup>15</sup> *See* Exhibit EVG-1 (LRS-1), DTE Response to EVgoDE-1.12.

<sup>16</sup> *See id.*

1 **Q: Is DTE’s proposal justified by stakeholder feedback the Company received prior to**  
2 **its rate case filing?**

3 A: No. In fact, excluding destination charging from the program is contrary to the feedback  
4 DTE received from stakeholders. As DTE notes, “[s]takeholders ranked all the public  
5 charging subsegments, including on-route *and destination charging*, as the most important  
6 for utility action because the availability of public charging is critical to reducing range  
7 anxiety, which is a key barrier to EV adoption.”<sup>17</sup> (Emphasis added). When asked to  
8 provide any feedback the Company received that supports the exclusion of rebates for  
9 community DCFC in its TEP, DTE provided no direct feedback from stakeholders.<sup>18</sup>

10 **Q: Did EVgo provide feedback to DTE regarding the Business Charger Rebates**  
11 **program through the stakeholder process preceding this rate case filing?**

12 A: Yes. DTE’s initial proposal was to limit the Business Charger Rebate program to DAC and  
13 rural on-route deployments. Prior to this rate case filing, EVgo and ChargePoint provided  
14 joint feedback to DTE<sup>19</sup> supporting the Business Charger Rebate program in its current  
15 form and recommending DTE extend the availability of this program, without geographic  
16 limitations, in the TEP. We expressed our concern that DTE’s proposal to narrow the  
17 availability of Business Charger rebates to DACs and rural on-route deployments in its  
18 TEP could stall the market’s momentum and adversely impact market stability in DTE’s  
19 territory. We also explained that the National Electric Vehicle Infrastructure (“NEVI”)  
20 Formula program will support sites near corridors—areas similar to DTE’s “on-route”  
21 areas—and therefore recommended DTE support the deployment of chargers in areas that

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<sup>17</sup> DTE testimony part 1 at PB-46:1-4

<sup>18</sup> See Exhibit EVG-1 (LRS-1), DTE response to EVgoDE-1.12.

<sup>19</sup> See Exhibit EVG-2 (LRS-2).

1        *do not qualify* for NEVI funding in order to encourage the broad geographic distribution  
2        of charging infrastructure.<sup>20</sup> Finally, we recommended options that would allow DTE to  
3        address DAC/rural charging gaps while also supporting the broader market.

4        **Q: How did DTE respond to EVgo and ChargePoint’s recommendation?**

5        A: The Company explained that it expanded its Business Charger Rebate program to on-route  
6        DCFCs outside of DAC or rural areas in response to feedback it received.<sup>21</sup>

7        **Q: Did this resolve the concerns EVgo raised?**

8        A: While expanding eligibility to “on route” locations outside of DACs and rural areas was a  
9        step in the right direction, DTE’s modification did not alleviate EVgo’s concerns because  
10       the Business Charger Rebates program (as-filed) continues to limit eligibility to on-route  
11       locations, which, as noted above, does not enable equitable charging access for those living  
12       in multifamily housing and others without access to home charging.

13       **Q: What do you recommend to the Commission with respect to the Business Charger  
14       Rebates program?**

15       A: I recommend the Commission direct the Company to support both corridor and community  
16       locations through the Business Charger Rebate program (similar to scope of the existing  
17       program) and eliminate the requirement that participating sites be located “on-route” in  
18       both the DAC/rural and the non-DAC/rural subsegments of the program.

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<sup>20</sup> The Michigan Department of Transportation has since announced 41 NEVI project selections amounting to \$22.9 million in requested funds.

<sup>21</sup> DTE testimony part 1 at PB-46:22-25.

1 **Q: Is there a way for the Company to encourage the deployment of corridor charging**  
2 **without eliminating incentives for community charging?**

3 A: Yes. If the Company wishes to encourage participants to develop “on-route” sites, it should  
4 incorporate this preference into its scoring rubric instead of eliminating support for DCFC  
5 community charging altogether.

6 **Q: Please elaborate.**

7 A: In its last rate case, the Commission ordered DTE to work with stakeholders to develop a  
8 points-based scoring rubric to transparently evaluate applicants to the Business Charger  
9 Rebates program.<sup>22</sup> To the extent DTE has a reasonable preference for certain types of  
10 deployments (*i.e.*, corridor locations) they can reflect that preference by assigning  
11 additional points to specific types of deployments in the scoring rubric. This would have  
12 the practical effect of encouraging DTE’s “preferred” deployments without eliminating  
13 support for other deployments; ultimately allowing private market participants to continue  
14 to optimize siting for the benefit of EV drivers.

15 **Q: What are the benefits of supporting both corridor and community locations through**  
16 **the Business Charger Rebates program?**

17 A: This geographically inclusive approach is in line with the existing, successful Business  
18 Charger Rebates program, which does not include an “on-route” requirement. Allowing  
19 sites in both DAC/rural and non DAC/rural areas to be located either on corridors or in  
20 communities will result in a more equitable distribution of charging infrastructure across  
21 DTE’s service territory. Critically, making Business Charger Rebates available for corridor  
22 and community charging will help make EVs accessible to multifamily housing residents,

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<sup>22</sup> Case No. U-21297, Final Decision at 373-374.

1 renters and others without access to home charging. Providing this flexibility will also  
2 increase the number of communities that can be served by the program, particularly in  
3 disadvantaged and rural areas, and ensure that chargers are conveniently located, even if a  
4 resident lives farther from a major throughway.

5 Additionally, making Business Charger Rebates available for both corridor and  
6 community charging will allow DTE to leverage the expertise of the private market in  
7 siting chargers to ensure they are located in the most convenient locations where the  
8 greatest need exists. EV charging providers like EVgo have a significant amount of  
9 experience siting fast charging locations and have the ability to utilize tools that incorporate  
10 years of data and several critical factors into charger siting. This allows us to understand  
11 which locations have the greatest need and predict the extent to which each location will  
12 be utilized by drivers. Thus, removing the restrictive on-route requirement will increase  
13 the pool of potential sites and applicants and will ensure robust program participation.  
14 Ultimately, a successful program that effectively drives charging infrastructure deployment  
15 will maximize DTE ratepayer benefits and other public interest benefits, while helping the  
16 State of Michigan meet the ambitious transportation electrification goals in its MI Healthy  
17 Climate Plan.<sup>23</sup>

18 **Q: Do you have any other recommendations with regard to the Business Charger**  
19 **Rebates program?**

20 A: Yes, I have one recommendation with regard to the existing Business Charger Rebates  
21 program. In discovery, the Company noted that there was approximately \$5 million in

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<sup>23</sup> Michigan Department of Environment, Great Lakes and Energy, MI Healthy Climate Plan, April 2022, available at: <https://www.michigan.gov/egle/about/organization/climate-and-energy/mi-healthy-climate-plan>.

1 funding remaining in Business Charger Rebate program as of May 17, 2024.<sup>24</sup> DTE  
2 explained this funding will only be available to applicants for sites operationalized by  
3 December 31, 2024<sup>25</sup> and “[i]f funding for the Business Charger Rebate program is not  
4 depleted by the time the Company’s proposed Transportation Electrification Program  
5 (TEP) is implemented, the Company plans to consult with stakeholders regarding potential  
6 reallocation of the remaining funds approved for the Business Charger Rebates program to  
7 other programs such as the TEP’s Public charging for Other On-route DCFC segment.”<sup>26</sup>  
8 While DTE suggests that funding *may* be reallocated to the non-DAC/rural subsegment of  
9 the Business Charger Rebates program proposed in this proceeding, this outcome is not  
10 certain.

11 Therefore, I recommend the Commission direct the Company to reallocate any  
12 funds remaining from the existing Business Charger Rebate program into the non-  
13 DAC/rural subsegment of the proposed Business Charger Rebate program instead of  
14 allowing the utility to determine the reallocation of these funds at a later date. This will  
15 provide greater funding certainty for the charging industry, which is crucial for creating a  
16 stable market environment that supports continuous deployment, rather than a “start and  
17 stop” cycle of development.

#### 18 **IV. EV FAST CHARGER RATE**

19 **Q: Please summarize DTE’s EV Fast Charger rate design.**

20 **A:** As directed by the Commission in its last rate case,<sup>27</sup> DTE describes an EV Fast Charger  
21 rate design in its testimony. DTE presents this rate as “a starting point for discussion only

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<sup>24</sup> See Exhibit EVG-1 (LRS-1), DTE Response to EVgoDE-1.1.d.

<sup>25</sup> See Exhibit EVG-1 (LRS-1), DTE Response to EVgoDE-1.2.

<sup>26</sup> See Exhibit EVG-1 (LRS-1), DTE Response to EVgoDE-1.3.

<sup>27</sup> Case No. U-21297, Final Decision at 342.

1 and not as a rate to be implemented at the conclusion of this case.”<sup>28</sup> DTE explains that  
2 determinants and load shape for the EV Fast Charger rate were based on usage from a small  
3 set of current, known EV fast chargers on separate meters with more than 300 read days—  
4 a total of 21 chargers.<sup>29</sup>

5 **Q: What concerns did the Company raise regarding the EV Fast Charger rate?**

6 A: The Company expressed concerns about the data sample size and quality. The Company  
7 notes that “[t]he sample size is small because the overall density of EV fast chargers is still  
8 small relative to customer counts in other cost of service classes. Very small cost of service  
9 classes such as this one can lead to volatile determinants, COS, and rate design from case  
10 to case and individual customers may have an outsized impact on the overall class.”<sup>30</sup> DTE  
11 also points out “[t]he sample size, while reasonably defined, does not include all EV fast  
12 chargers served by the Company given the co-location of charging load with other general  
13 service loads.”<sup>31</sup> In conclusion, the Company states “[t]he data constraints and generally  
14 small customer set indicate that this proposal should be used as a starting point for  
15 discussion only and not as a rate to be implemented at the conclusion of this case.”<sup>32</sup>

16 **Q: What do you recommend with regard to the EV Fast Charger rate?**

17 A: I share DTE’s concerns regarding the size and quality of the data used to design the EV  
18 Fast Charger rate. 21 customers is an exceedingly small sample size—susceptible to outsize  
19 effects from the characteristics of a single customer’s usage. Designing a rate based on  
20 such a small set of customers could have adverse effects both on individual customers and

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<sup>28</sup> DTE testimony part 2 at AW-36:14-17.

<sup>29</sup> *Id.* at AW-35:11-24.

<sup>30</sup> *Id.* at AW-36:3-7.

<sup>31</sup> *Id.* at AW-36:8-10.

<sup>32</sup> *Id.* at AW-36:14-17.

1 the industry more broadly. I therefore agree with the Company’s assessment that the EV  
2 Fast Charger rate should not be implemented at the conclusion of this case. I recommend  
3 the Commission approve DTE’s proposal to take no further action related to the EV Fast  
4 Charger rate at this time.

5 **Q: Have utilities and Commissions in other states had similar experiences related to**  
6 **creating a separate rate class for EV charging customers?**

7 A: Yes. While many Commissions across the country have approved EV fast charging rates,  
8 in EVgo’s experience, EV charging customers are rarely, if ever, placed in a separate rate  
9 class. To date, Commissions and utilities have generally rejected proposals for developing  
10 a separate rate class for EV charging customers for reasons similar to those presented by  
11 DTE in this case. In Illinois, for example, the Commission rejected Commonwealth Edison  
12 Company’s proposal to create separate EV charging delivery classes, expressing concerns  
13 regarding the lack of data on the proposed new delivery classes, and finding that the  
14 proposal was premature.<sup>33</sup> Similarly, through a settlement agreement in a 2021 proceeding  
15 in Colorado, Public Utilities Commission Staff and the utility, Public Service Company of  
16 Colorado, agreed to avoid a standalone rate class for commercial EV charging and a  
17 separate cost allocation for the EV rates in the next rate case due to the relatively small  
18 number of EV charging customers and total load.<sup>34</sup> Finally, in a recent Jersey Central  
19 Power & Light Company (“JCP&L”) Base Rate Filing the utility noted “there is limited  
20 data to develop a [cost of service study] and design a commercial Direct-current fast

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<sup>33</sup> Ill. Commerce Comm’n, Docket Nos. 22-0432 and 22-0442 (cons.), Final Order at 237.

<sup>34</sup> Colorado Public Utilities Commission, 21AL-0494E, Non-Unanimous Comprehensive Settlement Agreement at 4.

1 charger (“DCFC”) rate...” showing that there was only 8 months of DCFC data and only 7  
2 out of 13 chargers with data available during June and July—the system peak.<sup>35</sup>

3 **V. CONCLUSION**

4 **Q: Please summarize your recommendations to the Commission.**

5 A: I recommend that the Commission:

6 a. Direct the Company to support both corridor *and* community locations through the  
7 Business Charger Rebates program (similar to the scope of the existing program),  
8 and eliminate the requirement that participating sites be located “on-route” in both  
9 the DAC/rural and the non-DAC/rural subsegments of the program.

10 b. Direct the Company to reallocate any funds remaining from the existing Business  
11 Charger Rebate program on December 31, 2024 into the non-DAC/rural  
12 subsegment of the proposed Business Charger Rebate program instead of allowing  
13 the utility to determine the reallocation of these funds at a later date.

14 c. Adopt DTE’s proposal to take no further action related to the EV Fast Charger rate  
15 at this time.

16 **Q: Does this conclude your direct testimony?**

17 A: Yes.

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<sup>35</sup> JCP&L (Docket No. ER23030144), p. 29:20-30:5, available at:  
<https://www.firstenergycorp.com/content/dam/customer/OpCoHome/files/JCPLRegulatory/JCPL-2023-Base-Rate-Case-Incl-REV-Exh-10.pdf>.

## Appendix A

### **Experience & Qualifications:** Lindsey R. Stegall

Ms. Stegall serves as Senior Manager of Market Development and Public Policy at EVgo, where she leads the company's policy and regulatory engagement across the Central and Eastern U.S. In this role, Ms. Stegall works with public utilities commissions, state legislatures, state agencies, and other stakeholders to develop and support policies and programs that help accelerate transportation electrification.

Within the last three years, Ms. Stegall served as an expert witness in a PECO rate case in Pennsylvania (Docket No. R-2024-3046931, et al.), a Duke Energy rate case in Florida (Docket No. 20240025-EI), two Massachusetts proceedings related to the Electric Sector Modernization Plans of Eversource Energy (D.P.U. 24-10) and National Grid (D.P.U. 24-11); a DTE rate case proceeding in Michigan (Case No. U-21297); a Colorado Proceeding related to Public Service Company of Colorado's (PSCo) Transportation Electrification Plan (Proceeding No. 23A-0242E); an Arizona Public Service (APS) rate case proceeding (Docket No. E-01345A-22-0144); a Nevada proceeding related to NV Energy's Transportation Electrification Plan (Docket No. 21-09006); and a Colorado proceeding related to PSCo's commercial rates for EV charging (Proceeding No. 21AL-0494E). She also managed EVgo's regulatory engagement in an Oncor Electric rate case in Texas (Docket No. 53601), and transportation electrification plan cases filed by Northern States Power in Minnesota (Docket No. E002/M-22-432), APS in Arizona (Docket No. E01345A-22-0067), NV Energy in Nevada (Docket No. 21-09004), and Rocky Mountain Power in Utah (Docket No. 20-035-34).

Ms. Stegall has more than twelve years of experience in the clean energy sector and has been working on transportation electrification policy since 2018. Prior to joining EVgo in 2021,

Ms. Stegall served as Manager of Policy and Regulatory Affairs at the Colorado Energy Office (CEO), where she was employed for six years. During that time, Ms. Stegall managed CEO's engagement in energy regulatory proceedings before the Colorado Public Utilities Commission, including several related to transportation electrification and rate design.

Ms. Stegall holds a Master of Business Administration degree in Sustainable Management from Presidio Graduate School and a Bachelor of Arts degree from the University of Colorado.

**Exhibit List**

<b>Exhibit</b>	<b>Title</b>
EVG-1 (LRS-1)	Compiled discovery responses
EVG-2 (LRS-2)	EVgo and ChargePoint comments on DTE's draft TEP

**MPSC Case No:** U-21534

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**Requester:** Evgo

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**Question No.:** EVgoDE-1.1d

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**Respondent:** P. Bennett

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**Page:** 1 of 1

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**Question:** In the Commission's Final Order in Docket No. U-21297, the Commission approved the continuation and expansion of DTE's Business Charger Rebate program and approved DTE's funding request for that program.

Please provide:

d. The total amount of funding that remains available (unawarded) to applicants under the Business Charger Rebate program, as of the date of the Company's response to this discovery request.

**Answer:** The total amount of funding that remains available to applications under DTE Electric's Business Charger Rebate program, as of May 17<sup>th</sup>, is approximately \$5 million.

**Attachment:** *None*

**MPSC Case No:** U-21534

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**Requester:** Evgo

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**Question No.:** EVgoDE-1.2

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**Respondent:** P. Bennett

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**Page:** 1 of 1

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**Question:** In the Commission's Final Order in Docket No. U-21297, the Commission approved the continuation and expansion of DTE's Business Charger Rebate program and approved DTE's funding request for that program. If funding remains available (unawarded) to applicants under the Business Charger Rebates program as of the date of the Company's response to this discovery request, please explain if the Company plans on continuing to make that funding available to applicants until a) that funding is depleted, or b) some date certain, or c) some other date.

**Answer:** The Company plans on continuing to make the funding that is available (unawarded) to applicants under the Business Charger Rebate program, as of May 17, 2024, available to applicants until 12/31/2024 contingent on the site projects being operationalized by 12/31/2024.

**Attachment:** *None*

**MPSC Case No:** U-21534

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**Requester:** Evgo

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**Question No.:** EVgoDE-1.3

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**Respondent:** P. Bennett

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**Page:** 1 of 1

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**Question:** In the Commission's Final Order in Docket No. U-21297, the Commission approved the continuation and expansion of DTE's Business Charger Rebate program and approved DTE's funding request for that program. If funding for that program is not depleted by the time the Company's Transportation Electrification Program proposed in this case is implemented, does the Company plan on re-allocating the remaining funds approved for the Business Charger Rebates program? If yes, how does the Company plan on re-allocating those funds?

**Answer:** If funding for the Business Charger Rebate program is not depleted by the time the Company's proposed Transportation Electrification Program (TEP) is implemented, the Company plans to consult with stakeholders regarding potential reallocation of the remaining funds approved for the Business Charger Rebates program to other programs such as the TEP's Public charging for Other On-route DCFC segment.

**Attachment:** *None*

**MPSC Case No:** U-21534

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**Requester:** Evgo

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**Question No.:** EVgoDE-1.4

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**Respondent:** P. Bennett

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**Page:** 1 of 1

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**Question:** Does DTE consider its Business Charger Rebates program to be successful? Please explain.

**Answer:** DTE Electric considers its Business Charger Rebates program to be successful in that it has installed 310 sites with over 1,400 ports operational as of May 17, 2024. Despite fluctuations in demand, the Company's Business Charger Rebates program results are very near the target of 1,500 ports, which was based on an estimate of approximately 52,000 EVs in DTE Electric's service territory for the current level of EVs on the road, which is close to approximately 50,000 EVs.

**Attachment:** *None*

**MPSC Case No:** U-21534

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**Requester:** Evgo

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**Question No.:** EVgoDE-1.5

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**Respondent:** P. Bennett

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**Page:** 1 of 1

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**Question:** Company witness Bennett defines “on-route fast charging” as “fast charging within one mile of a major throughway exit.” See direct testimony of witness Bennett at PB-46 lines 4-5. Please define “major throughway” as used in the referenced testimony.

**Answer:** Major throughway is intended to refer to a high-traffic road that is likely to be a limited access Interstate or State highway.

**Attachment:** *None*

**MPSC Case No:** U-21534

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**Requester:** Evgo

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**Question No.:** EVgoDE-1.12

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**Respondent:** P. Bennett

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**Page:** 1 of 1

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**Question:** Refer to the testimony of witness Bennett at PB-47, lines 1-6. Please provide any analysis the Company conducted, or feedback the Company received, that supports the exclusion of rebates for Destination DCFCs in its Transportation Electrification Plan.

**Answer:** Destination chargers, by definition, are located at businesses like hotels, restaurants, or grocery stores, that may not be located within one mile of a major throughway. In order to balance public charger support with overall customer affordability the Company considered that these businesses have other incentives and motivations for charger installation, like increasing foot traffic and attracting customers to their businesses. Therefore, the Company determined to direct finite incentives to locations with fewer such incentives and inherent benefits.

**Attachment:** *None*

## EVgo and ChargePoint comments on DTE's draft TEP, shared with DTE via email

Kelsey and DTE Team,

Thank you for your presentation earlier this week and for the opportunity to provide feedback on DTE's proposed 2025-2028 Transportation Electrification Plan. The following feedback represents the perspectives of both EVgo and ChargePoint, and focuses on DTE's plan to limit the availability of its Business Charger Rebate program to Disadvantaged Community (DAC) and rural on-route DCFC charging stations.

EVgo and ChargePoint support DTE's Business Charger Rebate program in its current form and recommend DTE extend the availability of this program, without geographic limitations, in the TEP. We advocated for the expansion of the existing Business Charger Rebate program in DTE's pending and most recently completed rate cases, primarily because: 1) the program delivers benefits to DTE, the Company's ratepayers, EV drivers, and society as a whole, and 2) the program is a critical factor driving the steady growth of EV charging infrastructure in DTE's service territory. The broad geographic focus of DTE's existing Business Charger Rebate program is aligned with other utility incentive programs we've observed across the country, of which there are now numerous examples, both in states with slower EV adoption such as New Mexico, Kansas and Utah, and in those with more accelerated adoption, such as California, New York and Colorado.

We are concerned that DTE's proposal to narrow the availability of Business Charger rebates to DACs and rural on-route deployments in its inaugural Transportation Electrification Plan could stall the market's momentum. While the private sector may already be deploying some charging infrastructure outside of DACs and rural corridors in DTE's service territory, we are concerned that a funding cliff will adversely impact market stability in DTE's territory and that public charging deployment is likely to slow absent these rebates. In addition, given that the National Electric Vehicle Infrastructure (NEVI) Formula program will already be supporting sites near corridors—areas similar to DTE's "on-route" areas—it will be important for DTE's program to support chargers in areas that *do not qualify* for NEVI funding. DTE should aim to fill gaps in the charging network left by the NEVI program, thereby supporting broader geographic distribution of charging infrastructure. With all that said, we understand and appreciate that one of DTE's objectives going forward is to focus Business Charger Rebates in underserved areas. We believe this can be accomplished within a broader Business Charger Rebate program and offer two suggestions to that end. First, DTE could support the deployment of charging infrastructure in underserved areas by providing a higher incentive level for projects located in DAC or rural on-route areas, while continuing to offer a standard incentive level in other areas. Second, DTE could design an application scoring rubric that provides additional points for projects located in certain areas, in order to prioritize underserved locations. These approaches would allow DTE to ensure Business Charger Rebates flow to sites where they are needed the most, without prematurely ending support for sites in the remainder of DTE's service territory. We are familiar with other utility programs that have taken these approaches to promote equitable access to charging and are happy to share examples if DTE is interested. We look forward to continuing to work with DTE as it develops its Transportation Electrification Plan. Thank you for your consideration of our feedback and please do not hesitate to reach out with any questions.

Best,

**Lindsey Stegall**

Senior Manager, Market Development & Public Policy  
303-941-1729



**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 Wallace
supply of electric energy, and for )	
miscellaneous accounting authority )	

**PROOF OF SERVICE**

On July 26, 2024, an electronic copy of **Direct Testimony of Lindsey Stegall on behalf of EVgo Services, LLC and Exhibits EVG-1 (LRS-1) – EVG-2 (LRS-2)** was served on the following via email:

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

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Dated: July 26, 2024