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August 16, 2024

Ms. Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 West Saginaw Hwy, 3rd Floor
Lansing, MI 48909

Re: Case U-21534 - 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

Dear Ms. Felice:

Enclosed for electronic filing is International Transmission Company d/b/a ITC*Transmission's* Rebuttal Testimony of Pushkar Chindhade and Proof of Service in the above-referenced matter.

Sincerely,

DYKEMA GOSSETT PLLC

Richard J. Aaron

**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

REBUTTAL TESTIMONY OF PUSHKAR CHINDHADE

1 **Q. Please state your name and business address.**

2 A. My name is Pushkar Chindhade. My business address is 27175 Energy Way, Novi,
3 Michigan 48377.

4 **Q. By whom are you employed and in what capacity?**

5 A. I am the Principal Operations Engineer for ITC Holdings Corp. ("ITC"), parent company to
6 ITC *Transmission* ("ITCT").

7 **Q. Are you the same Pushkar Chindhade who filed direct testimony in this proceeding**
8 **on behalf of ITCT?**

9 A. Yes.

10 **Q. What is the purpose of your rebuttal testimony?**

11 A. I will respond to MPSC Staff's recommended partial disallowances for the three Blackstart
12 Projects and ABATE's request to disallow all projected capital expenditures associated
13 with the Blackstart Projects. Specifically, I will respond to ABATE's allegations that the
14 Blackstart Projects lack support and explanation.

1 **Q. Do you sponsor any exhibits with your rebuttal testimony?**

2 A. No, I do not.

3 **Q. What is MPSC Staff's position on the Blackstart Projects?**

4 A. MPSC Staff recommends a 14 percent disallowance for the DTE's capital expenditure
5 requests for the Blackstart Projects. (DeCooman Direct, pp 9-10.) According to MPSC
6 Staff "it is unreasonable to support the requested amounts when the Company has
7 consistently overestimated costs for the Blackstart Projects." (DeCooman Direct, p 9.)

8 **Q. What is your response to MPSC Staff's position?**

9 A. Blackstart resources are absolutely crucial to restarting our electric grid. That need can
10 come at times of inclement weather or other unanticipated emergencies. Blackstart
11 capable generation resources should be considered a high priority asset and essential to
12 the energy infrastructure of the state, Local Resource Zone 7, and the region. The
13 Commission should support the Blackstart Projects as an essential component to the
14 state's energy security, particularly as our grid becomes increasingly complex and
15 blackstart resources are retired.

16 **Q. What is ABATE's position on the Blackstart Projects?**

17 A. ABATE recommends that the Commission "Disallow all projected capital expenditures
18 associated with the [Blackstart Projects] from rate base." (York Direct, p 23.) ABATE
19 argues that "ratepayers should not be responsible for unsubstantiated costs that have not
20 been demonstrated to be reasonably likely to be incurred by DTE in the bridge period or
21 projected test year." (*Id.*) ABATE looks to two of the Blackstart Project and in turn takes
22 issue with redactions on confidential documents, which it argues inhibited its ability to

1 “independently review and assess the scope of this project, project timelines, or any
2 revisions that have occurred.” (York Direct, p 24, 25.)

3 **Q. What is your response to ABATE’s position on the Blackstart Projects?**

4 A. ABATE’s objection to the Blackstart Projects rests primarily on its inability to independently
5 review confidential documents that contain highly sensitive information that impacts the
6 security of the electric grid. The Commission has recognized that inclusion of the
7 Blackstart Projects in rate base is appropriate to support the North American Electric
8 Reliability Corporation’s Blackstart plan. (Case No. U-21297, December 1, 2023 Order at
9 43.)¹ The Commission also determined that the Blackstart Projects were important to
10 maintain grid security and that DTE had provided enough information to support recovery
11 of the costs. (*Id.*) ABATE continues to request information—and complain about redacted
12 information—that DTE is obligated to safeguard and keep confidential. DTE should not
13 be penalized for complying with its obligations with regard to confidentiality. Both ABATE
14 and MPSC Staff acknowledge that DTE has provided updated scoping documents with
15 updated project estimates in this case. (See Exhibit AB-2.) DTE has provided the parties
16 to this case with the information it is able to disclose without compromising the security of
17 the electric grid or violating its other obligations to maintain the confidentiality of these
18 documents. The Commission should remain consistent with its position in U-21297 that
19 no further disclosure of information regarding the Blackstart Projects is appropriate.

¹ Here, the Commission refers to NERC’s Blackstart plan, though it is believed the Commission intended to cite to NERC’s Standards regarding system restoration from blackstart resources.

1 **Q. Has ITCT's position regarding the Blackstart Projects changed from the position**
2 **stated in your direct testimony?**

3 A. No, it has not. ITCT requests that the Commission approve the remaining costs for these
4 projects in full without disallowance or further conditions.

5 **Q. Does that conclude your rebuttal testimony?**

6 A. Yes.

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schedules and rules governing the)
distribution and supply of electric energy,)
and for miscellaneous accounting)
authority.)

PROOF OF SERVICE

Melissa A. Goodrich, an employee of Dykema Gossett PLLC, being first duly sworn, deposes and says that on the 16th day August, 2024, she served International Transmission Company d/b/a ITC*Transmission's* Rebuttal Testimony of Pushkar Chindhade, and Proof of Service on the parties listed on the attached service list via electronic mail.

Melissa A. Goodrich

SERVICE LIST
MPSC CASE NO: U-21534

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