



Paula Johnson-Bacon
(313) 235-7052
paula.bacon@dteenergy.com

August 27, 2024

Christopher M. Bzdok
Troposphere Legal
420 E. Front Street
Traverse City, MI 49686

RE: In the matter of the Application of **DTE ELECTRIC COMPANY** for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority
MPSC Case No. U-21534

Dear Mr. Bzdok:

Attached for electronic filing in the above captioned matter is DTE Electric Company's First Partial Response (MNSCDE-18. 1, 2, 4-13, 16-28, 30, 35, 36, and 39) to the Michigan Environmental Council, Natural Resources Defense Council, Sierra Club, and Citizens Utility Board of Michigan's Eighteenth Discovery Request. Some of the attachments contain confidential information that is only being disclosed to the parties who executed non-disclosure certificates pursuant to the Protective Order. The attachments to the responses are being provided to the respective parties via the following links listed below:

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

Confidential CEII Portal Link: (non Read Only)

<https://dteenergy.sharepoint.com/sites/DiscoveryPortal/Elec/U-21534CEIIDocuments/default.aspx>

Also attached is the Proof of Service.

Very truly yours,

Paula Johnson-Bacon

PJB/erb

Attachments

cc: Service List

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the Application of)
DTE ELECTRIC COMPANY for)
authority to increase its rates, amend its)
rate schedules and rules governing the)
distribution and supply of electric energy,)
and for miscellaneous accounting authority)

Case No. U-21534

PROOF OF SERVICE

STATE OF MICHIGAN)
) ss.
COUNTY OF WAYNE)

ESTELLA R. BRANSON states that on August 27, 2024, she served a copy of DTE Electric Company’s First Partial Response (MNSCDE-18. 1, 2, 4-13, 16-28, 30, 35, 36, and 39) to the Michigan Environmental Council, Natural Resources Defense Council, Sierra Club, and Citizens Utility Board of Michigan’s Eighteenth Discovery Request in the above captioned matter, via electronic mail and portal links, upon the persons listed on the attached service list.

ESTELLA R. BRANSON

MPSC Case No. U-21534

Service List

Page 1

ABATE

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

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

ABATE Consultant

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

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

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

Justin Barnes
Alexander J. Zakem
jbarnes@eq-research.com
ajz-consulting@comcast.net

MICHIGAN EIBC/IEI/UNITED

Laura Sherman
laura@mieibc.org

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

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

Breanna Thomas, Legal Assistant
breanna@tropospherelegal.com

Consultants:

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

CITY OF ANN ARBOR

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

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

City of Ann Arbor Consultant:

Richard J. Bunch
rick@mi-maui.org

ELECTRIFY AMERICA, LLC

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

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

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

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

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

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

EVGO SERVICES, LLC

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

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

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

GREAT LAKES RENEWABLE ENERGY ASSOCIATION INC.

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

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

**INTERNATIONAL TRANSMISSION
COMPANY**

Richard J. Aaron
Courtney F. Kissel
Olivia R.C.A. Flower
Hannah E. Buzolits
201 Townsend Street, Suite 900
Lansing, MI 48933
RAaron@dykema.com
CKissel@dykema.com
OFlower@dykema.com
HBuzolits@dykema.com

THE KROGER COMPANY

Michael L. Kurtz
Kurt J. Boehm
Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202
mkurtz@BKLawfirm.com
KBoehm@BKLawfirm.com
JKylerCohn@BKLawfirm.com

Kroger Consultant

Justin Bieber
jbieber@energystrat.com

MICHIGAN ATTORNEY GENERAL

Joel King
Michael Moody
Assistant Attorney General
ENRA Division
525 W. Ottawa Street, 6th Floor
P.O. Box 30755
Lansing, MI 48909
KingJ38@michigan.gov
MoodyM2@michigan.gov

AG Consultant

Seb Coppola
sebcoppola@corplytics.com

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

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

Justin Mann, Legal Assistant
jmann@fraserlawfirm.com

**MICHIGAN MUNICIPAL
ASSOCIATION FOR UTILITY ISSUES**

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

Linda Hofrichter
Rick Bunch
lhd@rivenoaklaw.com
rick@mi-maui.org

MPSC STAFF

Heather M.S. Durian
Michael J. Orris
Amit T. Singh
Monica M. Stephens
Public Service Division
7109 West Saginaw Hwy, 3rd Floor
Lansing, MI 48917
durianh@michigan.gov
orrism@michigan.gov
singha9@michigan.gov
stephensm11@michigan.gov

Lori Mayabb
MPSC Staff Case Coordinator
mayabbl@michigan.gov

MPSC Case No. U-21534

Service List

Page 4

SOULARDARITY; WE WANT GREEN, TOO

Mark Templeton

Amanda Urban

Jacob Schuhardt

Sam Heppell

Boris Lukanov

Joseph Amdur

Claire Black

Michelle David

Jason Frey

Andrew Kieffer

Ellie Maltby

Andrew Obeso

Ivy Truong

Jesse Bernes-Zieve

Josh Bretthauer

Sara Macedo

Serendipity Welsh

Adriel Ghadoushi

University of Chicago Law School

Abrams Environmental Law Clinic

6020 South University Avenue

Chicago, IL 60637

templeton@uchicago.edu

t-9aurba@lawclinics.uchicago.edu

jschuhardt@uchicago.edu

heppell@uchicago.edu

blukanov@psehealthyenergy.org

aelc_mpsc@lawclinic.uchicago.edu

Justin Schott

jbschott@umich.edu

Madison S. Wilson, Legal Assistant

madisonswilson@uchicago.edu

UTILITY WORKERS LOCAL 223

Ben King

3950 W. 11 Mile Road

Berkley, MI 48072

bking@michworkerlaw.com

WAL-MART

Melissa M. Horne

Higgins, Cavanagh & Cooney, LLP

10 Dorrance Street, 4th Floor

Providence, RI 02903

mhorne@hcc-law.com

ABATE

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

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

ABATE Consultant

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

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

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

Breanna Thomas, Legal Assistant
breanna@tropospherelegal.com

Consultants:

Paul Alvarez
Dennis Stephens
palvarez@wiredgroup.net
dennis.stephens@hotmail.com

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

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

EVGO SERVICES, LLC

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

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

**INTERNATIONAL TRANSMISSION
COMPANY**

Richard J. Aaron
Courtney F. Kissel
Olivia R.C.A. Flower
Hannah E. Buzolits
201 Townsend Street, Suite 900
Lansing, MI 48933
RAaron@dykema.com
CKissel@dykema.com
OFlower@dykema.com
HBuzolits@dykema.com

MICHIGAN ATTORNEY GENERAL

Joel King
Michael Moody
Assistant Attorney General
ENRA Division
525 W. Ottawa Street, 6th Floor
P.O. Box 30755
Lansing, MI 48909
KingJ38@michigan.gov
MoodyM2@michigan.gov

Amanda Churchill
ChurchillA1@michigan.gov

AG Consultant

Seb Coppola
sebcoppola@corplytics.com

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

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

**MICHIGAN ENERGY INNOVATION
BUSINESS COUNCIL**

Justin Barnes
jbarnes@eq-research.com

MPSC STAFF

Heather M.S. Durian
Michael J. Orris
Amit T. Singh
Monica M. Stephens
7109 West Saginaw Hwy, 3rd Floor
Lansing, MI 48917
durianh@michigan.gov
orrism@michigan.gov
singha9@michigan.gov
stephensm11@michigan.gov

**SOULARDARITY; WE WANT GREEN,
TOO**

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

MPSC Case No. U-21534
CEII NDA Service List
Page 3

Justin Schott
jbschott@umich.edu

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