John Richter

EDUCATION

Murdoch University, Perth, Australia – January 2009
M.S. in Renewable Energy

Oakland Community College, Rochester Hills, Michigan – 1991
Alternative Energy Technologies (Solar, Wind, Biomass)

Oakland University**,** Rochester, Michigan
B.S. Engineering, minor in Economics - 1982

RENEWABLE ENERGY EXPERIENCE

Adjunct Instructor, Macomb Community College (2009 – 2010)
Online / classroom hybrid course including labs.
Grant-funded curriculum development and classroom instruction in solar energy.

President, Great Lakes Renewable Energy Association (2002 – 2003)
Non-profit administration focused on financial planning, fundraising & recruitment. Staffing, budget, and strategic planning.

Policy Analyst, Great Lakes Renewable Energy Association
Developed position papers on policy initiatives. One of three invited presenters to the Northeast and Midwest Caucus meeting on a national RPS. Presented: *Wind Power and Distributed Generation* to U.S. Congressional Staffers at the U.S. Capitol Building. Member of the MPSC collaborative on renewable energy and the Michigan Wind Working Group of the DOE's *Wind Powering America* program.

Renewable Energy Consultant

American Green Careers
Project management and meeting facilitation for a team of independent contractors for the start-up of a proprietary school green jobs training program.

Great Lakes Renewable Energy Association
Researched, developed, and presented policy recommendations: *Opportunities for Renewable Energy Deployment* to Michigan legislators and staff.

Midwest Education Connection Network (MECNet) / Urban Options
Developed K-12 educational materials: *Michigan's Renewable Energy and Efficiency Success Stories*. This complemented materials from NEED.

American Council for an Energy Efficient Economy (ACEEE)
Researched and authored *Michigan's Current Energy Situation* section of an energy efficiency white paper for the State Governor.

Speaker
Scores of speaking engagements at conferences, community colleges, and community groups for two decades, including:

- American Solar Energy Society; *Making the Benefits of RE Real,* and *World Oil Depletion and Its Implications for U.S. Energy Policy*
- Pierce Cedar Creek RE Conference - Keynote speaker: *RE Cornucopia*
- PBS Documentary: *Michigan's Green Energy Economy*

Contributing Writer
Home Power Magazine, The Rock River Times, ReNews, Energy Paths, Energy Times

TELECOM EXPERIENCE

Century Link Communications *(formerly Level-3, Global Crossing, Frontier, and Allnet),* Southeastern Michigan – September 1987 to March 2002, December 2002 – May 2018

Sr. Software Architect

Design and specify software changes to meet program objectives.

- Define project scope, deliverables, schedule and budget.
- Develop software specifications.

Sr. Product Development Manager

Plan, direct, and coordinate all work activities to build new services on-time and within budget.

- Create cross-functional project teams with members from various departments; build team commitment to project objectives.
- Define project scope, deliverables, schedule and budget.
- Create or update business processes to support new products.
- Develop software specifications.

Director, Product Platform Development

Responsible for the selection, purchase, project management, installation, integration, and operation of multi-million dollar real-time call processing systems.

- Performed vendor/product evaluation, purchase negotiations and installation project management.
- Managed staff of 23 Software Engineers developing real-time call processing software and integrating purchased systems.

Senior Manager of Hardware Integration

Responsible for evaluation, selection, engineering, purchase, and installation of all switching equipment and Digital Cross-connect Systems (DCS).

- Planned and managed annual capital budget in excess of $25M.
- Negotiated pricing and payment terms, installation schedules, and acceptance testing procedures.
- Created network traffic forecasting model for budgetary and capacity planning. Selected sites to close for economic efficiency.
- Provided Project Management of equipment purchases, moves, and installs to facilitate consolidation of four acquired carrier switching networks into one fully integrated network.

Rob Rafson - Bio

Founder of Chart House Energy and President, Rob Rafson has 27 years experience in environmental engineering, design, construction and operation of over 150 environmental improvement projects in the United States and abroad.

Mr. Rafson has achieved recognition in energy efficiency, patented innovative soil remediation technology, gaseous emission controls and Brownfield redevelopment. He has redevelopment of 17 contaminated properties including four SuperFund projects in the Chicago area and as part of those redevelopments installed energy efficiency measures and renewable energy systems, including the largest solar thermal system in Illinois.

Author
Mr. Rafson has authored the authoritative text "Brownfields - Redeveloping environmentally contaminated properties", published June 1999 with McGraw-Hill and contributing author "Odor and VOC Control Handbook", published 1998.

Education
Rob graduated form University of Wisconsin/Madison 1983 with a Mechanical Engineering degree. He is also a licensed Professional Engineer.

Chart House Company History
Chart House Energy was founded in 2009 as a renewable energy independent power production company. His goal is to grow a portfolio of owned Renewable Energy and Energy Efficiency property.

The company has completed over 5 MW of Solar PV projects, including the largest photovoltaic project in Michigan, largest photovoltaic project in Iowa, and second largest in Illinois. Chart House Energy owns 465kW and expects to double that while building 1 MW of solar this year.

The company offers clean energy, energy efficiency and energy storage solutions. By integrating Combined Heat and Power with renewable energy, energy efficiency measures and storage, these systems can operate on or off grid, have uninterruptable power and rapidly move towards sustainable operations.

Expert Witness
Rob uses his extensive experience in the solar industry to examine energy and proposals and evaluates them based upon his extensive experience with developing projects and understanding the real life effects of high-energy bills on residential ratepayers. Because of his professional experience he can see through rhetoric that is on paper and how it may not match with reality.

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**

_____/

EXHIBIT GLREA-3

DTE Discovery Response GLREADE-6.83a
DTE Discovery Response GLREADE-6.83b
DTE Discovery Response GLREADE-6.83c (S1)
(with attached Fortieth Revised Tariff Sheets C-65.00 and C-70.00)
DTE Discovery Response GLREADE-6.84

On Behalf of

Great Lakes Renewable Energy Association

September 9, 2024

MPSC Case No: U-21534
Requester: GLREA
Question No.: GLREADE-6.83a
Respondent: A. Willis
Page: 1 of 1

Question: DTE proposes that the credit for low-income customers be increased from $40.00 to $50.00. With respect to this proposal, please answer the following questions:

a. Is DTE proposing to disallow this increase in the low-income customer billing credit for those residential customers that have securitization surcharges appearing on their total bill?

Answer: The Company objects for the reason that the request is vague and unanswerable in its current form. Namely, the meaning of "DTE proposing to disallow" something it proposed in its direct testimony is unclear. Subject to and without waiving that objection, the Company responds as follows:

All residential customers are currently subject to securitization charges, and the Company maintains its support for its proposed increase in the low income assistance credit.

Attachment: *None*

Co-respondent: Legal

MPSC Case No: U-21534
Requester: GLREA
Question No.: GLREADE-6.83b
Respondent: A. Willis
Page: 1 of 1

Question: DTE proposes that the credit for low-income customers be increased from $40.00 to $50.00. With respect to this proposal, please answer the following questions:

b. Is DTE proposing to adjust the calculation of billing credits to DG customers under Section 177(2) of 2023 PA 235 for (or due to) rate discounts or credits existing in DTE's tariffs or with respect to DTE tariffs proposed in this case. If so, please fully explain.

Answer: No. Credits for DG outflow are described in the Company's tariff on Sheet Nos 114.00 through 116.00. The Rider 18 outflow credits being proposed in this case are located in my Exhibit A-16 Schedules F7 and F8.

Attachment: *None*

MPSC Case No: U-21534
Requester: GLREA
Question No.: GLREADE-6.83c (S1)
Respondent: A. Willis
Page: 1 of 1

Question: DTE proposes that the credit for low-income customers be increased from $40.00 to $50.00. With respect to this proposal, please answer the following questions:

c. Does DTE include in the total bill rendered to residential customers any securitization surcharges? If yes, please detail all such surcharges.

Answer: Yes. See the Company's tariff book, Sheets Nos. C-64.00 through C-65.00, Sheets Nos. C-69.00 through C-69.01, and Sheet Nos. C-70.00 through C-71.00.

See attachment for the tariff pages containing the current securitization charges applicable to residential customers.

Attachment: U-21534 GLREADE-6.83c Securitization Surcharges.pdf

M.P.S.C. No. 1 - Electric
DTE Electric Company
(Update Securitization)

Fortieth Revised Sheet No. C-65.00
Cancels Thirty-Ninth Revised Sheet No. C-65.00

(Continued from Sheet No. C-64.03)

C8 SURCHARGES AND CREDITS APPLICABLE TO POWER SUPPLY SERVICE (Contd.)

C8.5 SURCHARGES AND CREDITS APPLICABLE TO POWER SUPPLY SERVICE: Summary of surcharges and credits including PSCR, pursuant to sub-rules C8.1, C8.4 of this rule. (Cents per kilowatthour or percent of base bill unless otherwise noted).

	PSCR (¢/kWh)	Securitization Charge *River Rouge* (¢/kWh)	Securitization Charge TCSC (¢/kWh)	Total Power Supply Surcharges (excludes REPS) (¢/kWh)
Residential				
D1 Non Transmitting Meter	1.127	*0.0257*	0.2889	*1.4416*
D1.1 Int. Space Conditioning	1.127	*0.0200*	0.2285	*1.3755*
D1.2 Enhanced TOU	1.127	*0.0173*	0.1873	*1.3316*
D1.6 Special Low Income Pilot	1.127	*0.0257*	0.2889	*1.4416*
D1.7 Geothermal Time-of-Day	1.127	*0.0231*	0.1793	*1.3120*
D1.8 Dynamic Peak Pricing	1.127	*0.0219*	0.2493	*1.3982*
D1.9 Electric Vehicle	1.127	*0.0187*	0.2195	*1.3652*
D1.11 Standard TOU	1.127	*0.0255*	0.2889	*1.4414*
D1.13 Overnight Savers	1.127	*0.0255*	0.2889	*1.4414*
D2 Space Heating	1.127	*0.0159*	0.1751	*1.3180*
D5 Water Heating	1.127	*0.0136*	0.1540	*1.2946*
D9 Outdoor Lighting	1.127	*0.0051*	0.0563	*1.1884*
Commercial				
D1.1 Int. Space Conditioning	1.127	*0.0179*	0.1981	*1.3430*
D1.7 Geothermal Time-of-Day	1.127	*0.0119*	0.1316	*1.2705*
D1.8 Dynamic Peak Pricing	1.127	*0.0196*	0.2062	*1.3528*
D1.9 Electric Vehicle	1.127	*0.0227*	0.2917	*1.4414*
D3 General Service	1.127	*0.0209*	0.2303	*1.3782*
D3.1 Unmetered	1.127	*0.0175*	0.1918	*1.3363*
D3.2 Educ. Inst.	1.127	*0.0197*	0.1995	*1.3462*
D3.3 Interruptible	1.127	*0.0174*	0.1924	*1.3368*
D3.5 Charging	1.127	*0.0209*	0.2303	*1.3782*
D4 Large General Service	1.127	*0.0185*	0.2026	*1.3481*
D5 Water Heating	1.127	*0.0123*	0.1356	*1.2749*
D9 Outdoor Lighting	1.127	*0.0051*	0.0563	*1.1884*
R3 Standby (Secondary)	1.127	*0.0143*	0.1579	*1.2992*
R7 Greenhouse Lighting	1.127	*0.0119*	0.1316	*1.2705*
R8 Space Conditioning	1.127	*0.0181*	0.2014	*1.3465*
Industrial				
D6.2 Educ. Inst.	1.127	*0.0195*	0.2081	*1.3546*
D8 Interruptible Primary	1.127	*0.0110*	0.1189	*1.2569*
D10 Schools	1.127	*0.0187*	0.2029	*1.3486*
D11 Primary Supply	1.127	*0.0148*	0.1635	*1.3053*
D12 Large Low Peak	1.127	*0.0148*	0.1635	*1.3053*
D13 XL	NA	*0.0119*	0.0262	*0.0381*
R1.1 Metal Melting	1.127	*0.0096*	0.1083	*1.2449*
R1.2 Electric Process Heating	1.127	*0.0096*	0.1061	*1.2427*
R3 Standby (Primary)	1.127	*0.0143*	0.1579	*1.2992*
R10 Interruptible Supply	NA	*0.0000*	0.0262	*0.0262*
Governmental				
E1 Streetlighting	1.127	*0.0049*	0.0555	*1.1874*
E1.1 Energy Only	1.127	*0.0144*	0.1591	*1.3005*
E2 Traffic Lights	1.127	*0.0138*	0.1499	*1.2907*

(Continued on Sheet No. C-66.00)

Issued March 25, 2024
M. A. Bruzzano
Senior Vice President
Regulatory Affairs

Detroit, Michigan

Michigan Public Service Commission
March 26, 2024
Filed by: DW

Effective for bills rendered on and after April 1, 2024

Issued under authority of the Michigan Public Service Commission dated March 15, 2024 in Case No. U-21015

M.P.S.C. No. 1 - Electric
DTE Electric Company
(Update LIEAF)

Seventy-Eighth Revised Sheet No. C-70.00
Cancels Seventy-Seventh Revised Sheet No. C-70.00

(Continued from Sheet No. C-69.00)

C9 SURCHARGES AND CREDITS APPLICABLE TO DELIVERY SERVICE: (Contd.)

SURCHARGES AND CREDITS APPLICABLE TO DELIVERY SERVICE: (Contd.)

C9.8 Summary of Surcharges and Credits: Summary of surcharges and credits, pursuant to sub-rules C9.1, C9.2, C9.6, C9.7.9, and C.9.7.14. Cents per kilowatthour or percent of base bill, unless otherwise noted.

	NS ¢/kWh	EWRS ¢/kWh	Base Securitization ¢/kWh	IRM ¢/kWh	Total Delivery Surcharges ¢/kWh	LIEAF Factor $/Billing Meter
Residential						
D1 Non Transmitting Meter	0.0882	0.2552	0.0804	0.0139	0.4377	$0.87
D1.1 Int. Space Conditioning	0.0882	0.2552	0.1453	0.0139	0.5026	N/A
D1.2 Enhanced TOU	0.0882	0.2552	0.1445	0.0139	0.5018	$0.87
D1.6 Special Low Income Pilot	0.0882	0.2552	0.0804	0.0139	0.4377	$0.87
D1.7 Geothermal Time-of-Day	0.0882	0.2552	0.1371	0.0139	0.4944	N/A
D1.8 Dynamic Peak Pricing	0.0882	0.2552	0.1551	0.0139	0.5124	$0.87
D1.9 Electric Vehicle	0.0882	0.2552	0.1513	0.0139	0.5086	N/A
D1.11 Standard TOU	0.0882	0.2552	0.1575	0.0139	0.5148	$0.87
D1.13 Overnight Savers	0.0882	0.2552	0.1575	0.0139	0.5148	$0.87
D2 Space Heating	0.0882	0.2552	0.1527	0.0139	0.5100	$0.87
D5 Wtr Htg	0.0882	0.2552	0.1509	0.0139	0.5082	N/A
D9 Outdoor Lighting	0.0882	0.2552	0.1517	0.0778	0.5729	N/A
Commercial						
D1.1 Int. Space Conditioning	0.0882	See C9.6	0.1055	0.0088		$0.87
D1.7 Geothermal Time –of- day	0.0882	See C9.6	0.0931	0.0088		$0.87
D1.8 Dynamic Peak Pricing	0.0882	See C9.6	0.0939	0.0088		$0.87
D1.9 Electric Vehicle	0.0882	See C9.6	0.1673	0.0088		$0.87
D3 General Service	0.0882	See C9.6	0.0996	0.0088		$0.87
D3.1 Unmetered	0.0882	See C9.6	0.0931	0.0088		N/A
D3.2 Educ. Inst.	0.0882	See C9.6	0.0927	0.0088		$0.87
D3.3 Interruptible	0.0882	See C9.6	0.0920	0.0088		$0.87
D3.5 Charging	0.0882	See C9.6	0.1946	0.0088		$0.87
D4 Large General Service	0.0882	See C9.6	0.0987	See C9.7.11		$0.87
D5 Wtr Htg	0.0882	See C9.6	0.1007	0.0088		$0.87
D9 Outdoor Lighting	0.0882	See C9.6	0.1517	0.0434		N/A
R3 Standby Secondary	0.0882	See C9.6	0.0129	0.0088		$0.87
R7 Greenhouse Lighting	0.0882	See C9.6	0.0919	0.0088		$0.87
R8 Space Conditioning	0.0882	See C9.6	0.0982	0.0088		$0.87
Industrial						
D6.2 Educ. Inst.	0.0882	See C9.6	0.0155	See C9.7.11		$0.87
D8 Interruptible Primary	0.0882	See C9.6	0.0089	See C9.7.11		$0.87
D10 Schools	0.0882	See C9.6	0.0200	See C9.7.11		$0.87
D11 Primary Supply	0.0882	See C9.6	0.0078	See C9.7.11		$0.87
D12 Large Low Peak	0.0882	See C9.6	0.0078	See C9.7.11		$0.87
D13 XL	N/A	See C9.6	0.0024	See C9.7.11		$0.87
R1.1 Metal Melting	0.0882	See C9.6	0.0076	See C9.7.11		$0.87
R1.2 Electric Process Heating	0.0882	See C9.6	0.0157	See C9.7.11		$0.87
R3 Standby Primary	0.0882	See C9.6	0.0129	See C9.7.11		$0.87
R10 Interruptible Supply	0.0882	See C9.6	0.0027	See C9.7.11		$0.87

(Continued on Sheet No. C-71.00)

Issued August 19, 2024
M. A. Bruzzano
Senior Vice President
Regulatory Affairs

Detroit, Michigan

Michigan Public Service Commission
August 22, 2024
Filed by: DW

Effective for bills rendered on and after September 1, 2024

Issued under authority of the Michigan Public Service Commission dated July 23, 2024 in Case No. U-17377

MPSC Case No: U-21534
Requester: GLREA
Question No.: GLREADE-6.84
Respondent: A. Willis
Page: 1 of 1

Question: Detail the other increases or changes in billing credits or billing discounts that are being proposed by DTE in this case, including but not limited to senior citizen's rate discounts, discounts for customers signing up for interruptible tariffs, among others.

Answer: Please refer to Exhibit A-16 Schedules F3 and F8 for all proposed rate and tariff changes. There is no change proposed for the senior credit.

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**

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EXHIBIT GLREA-4

DTE Discovery Response GLREADE-6.79a
DTE Discovery Response GLREADE-6.79b
DTE Discovery Response GLREADE-6.80a
DTE Discovery Response GLREADE-6.81

On Behalf of

Great Lakes Renewable Energy Association

September 9, 2024

MPSC Case No: U-21534
Requester: GLREA
Question No.: GLREADE-6.79a
Respondent: J. Kryscynski
Page: 1 of 1

Question: Does DTE Electric take the position in this case or otherwise that any incremental equipment is necessary to measure inflow and outflow energy for distributed generation customers other than the metering and other equipment that DTE already has installed at residential customer locations?

a. If the answer is yes, please describe in detail the nature of any incremental equipment that is installed, or needs to be installed, at residential customer locations for those customers having distributed generation facilities.

Answer: Currently, residential locations do not require incremental equipment necessary to measure inflow and outflow of energy for residential distributed generation customers.

In the rare circumstances that a residential distributed generation customer application fails screening and supplemental study, additional equipment may be necessary to interconnect safely. The solution is determined on a case by case basis.

Attachment: None

Co-respondent: S. Deol

MPSC Case No: U-21534
Requester: GLREA
Question No.: GLREADE-6.79b
Respondent: J. Kryscynski
Page: 1 of 1

Question: Does DTE Electric take the position in this case or otherwise that any incremental equipment is necessary to measure inflow and outflow energy for distributed generation customers other than the metering and other equipment that DTE already has installed at residential customer locations?

b. With respect to any incremental equipment which DTE asserts is necessary for DG residential customers, please detail the per unit cost of each type of equipment.

Answer: See response in GLREADE-6.79a. Since the requirements for each installation will be determined on a case by case basis, unit cost will vary case by case.

Attachment: None

Co-respondent: S. Deol

MPSC Case No: U-21534
Requester: GLREA
Question No.: GLREADE-6.80a
Respondent: J. Kryscynski
Page: 1 of 1

Question: Has DTE included in this rate case any amount in rate base for incremental equipment to be applicable to residential DG customers to measure inflow or outflow

a. If the answer is yes, please detail the total amount included in rate base for incremental equipment applicable to residential DG customers.

Answer: To the best of my knowledge and belief, there is no incremental equipment beyond a standard meter associated with residential DG customers to measure inflow or outflow that is included in rate base.

Attachment: None

Co-respondent: S. Deol

MPSC Case No: U-21534
Requester: GLREA
Question No.: GLREADE-6.81
Respondent: J. Kryscynski
Page: 1 of 1

Question: Detail the total other costs that DTE has included in this rate case for incremental costs associated with DG residential customers besides costs included in rate base, such as operation & maintenance costs, taxes, general and administrative, or any other category of expense.

Answer: DTE Electric objects to the request for the reasons that the request is vague, unduly broad, seeks excessive detail and is otherwise not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the above objections the Company would state as follows:

Without providing a legal opinion, see, for example, MCL 460.1175 which provides, in pertinent part: "The customer shall pay all interconnection costs. The commission shall recognize the reasonable cost for each electric utility and alternative electric supplier to operate a distributed generation program. For an electric utility with 1,000,000 or more retail customers in this state, the commission shall include in that electric utility's nonfuel base rates all costs of meeting all program requirements except that all energy costs of the program shall be recovered through the utility's power supply cost recovery mechanism under section 6j of 1939 PA 3, MCL 460.6j. For an electric utility with fewer than 1,000,000 base distribution customers in this state, the commission shall allow that electric utility to recover all energy costs of the program through the power supply cost recovery mechanism under section 6j of 1939 PA 3, MCL 460.6j, and shall develop a cost recovery mechanism for that utility to contemporaneously recover all other costs of meeting the program requirements."

To the best of my knowledge and belief, any total other costs that DTE has included in this rate case for incremental costs associated with DG residential customers besides costs included in rate base, such as operation & maintenance costs, taxes, general and administrative, or any other category of expense are not distinguished on the basis of whether a customer is a DG customer.

Attachment: None.

Co-respondent: Legal, S.Deol

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**

_____/

EXHIBIT GLREA-5

DTE Discovery Response GLREADE-6.85a
DTE Discovery Response GLREADE-6.85b
DTE Discovery Response GLREADE-6.86

On Behalf of

Great Lakes Renewable Energy Association

September 9, 2024

MPSC Case No: U-21534

Requester: GLREA

Question No.: GLREADE-6.85a

Respondent: J. Kryscynski

Page: 1 of 1

Question: Does DTE compile and maintain records regarding service outages, and DTE's response to restore services when outages occur? With respect to this question, also answer the following:

a. If not, why not.

Answer: The Company maintains records for outages, including service outages. These records include restoration information.

Attachment: *None*

MPSC Case No: U-21534

Requester: GLREA

Question No.: GLREADE-6.85b

Respondent: J. Kryscynski

Page: 1 of 1

Question: Does DTE compile and maintain records regarding service outages, and DTE's response to restore services when outages occur? With respect to this question, also answer the following:

b. If yes, detail the manner in which DTE compiles and keeps outage records with respect to its service territory, to track specific locations where outages occur, such as by census data, zip code, DTE Company districts, municipalities, townships, or cities, or any such other records showing the geographical locations where service outages occur, and when customers experiencing outages have their service restored.

Answer: Outage data is tracked by address and is reported by zip code, census tract, and circuit.

Attachment: *None*

MPSC Case No: U-21534
Requester: GLREA
Question No.: GLREADE-6.86
Respondent: B. Hill
Page: 1 of 1

Question: Provide a copy of all company manuals, guidelines, or policies, that set forth the criteria by which DTE determines its response to service outages, including determining the manner by which DTE determines when and how customers experiencing service outages are to have their service restored.

Answer: The Company objects to this request to the extent it may be seeking internal documents that amount to DTE Electric's own internal policies and procedures which are privileged or qualifiedly privileged and, as such, are not admissible and not discoverable under Michigan law. Without waiving these objections, but subject to them, the Company responds as follows:

DTE utilizes its priority codes to dispatch jobs. The list of these priorities and job types were provided in case no. U-20464 under a non-disclosure agreement with the Commission.

Attachment: *None*

Co-respondent: Legal

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**

_____/

EXHIBIT GLREA-6

DTE Discovery Response GLREADE-7.89a
DTE Discovery Response GLREADE-7.89b
DTE Discovery Response GLREADE-7.89c

On Behalf of

Great Lakes Renewable Energy Association

September 9, 2024

MPSC Case No: U-21534

Requester: GLREA

Question No.: GLREADE-7.89a

Respondent: A. Willis

Page: 1 of 1

Question: 89) Regarding the rebuttal testimony of DTEE witness A. Willis (AW-24-rebuttal thru AW-27-rebuttal):

a) Witness Willis states that GLREA witness Richter's recommendation "would 1) create extraordinarily high summer on-peak rates". Has DTEE done a study to determine the summer on-peak rates that would result from the implementation of this recommendation? If so, please provide that study. If not, how high is "extraordinarily high"?

Answer: The Company has not performed any such study. However, Mr. Richter's proposal would, for D3.11, result in a capacity revenue requirement in the summer on peak approximately 7.6x larger than the Company's proposal.

Attachment: *None*

MPSC Case No: U-21534
Requester: GLREA
Question No.: GLREADE-7.89b
Respondent: A. Willis
Page: 1 of 1

Question: 89) Regarding the rebuttal testimony of DTEE witness A. Willis (AW-24-rebuttal thru AW-27-rebuttal):

b) Witness Willis states that "economic efficiency of rate design… is not the only consideration". What other considerations in rate design are better served by the Company's proposed commercial TOU rates, than the commercial TOU rates recommended by GLREA witness Richter?

Answer: Rate design may also consider, for example, understandability, simplicity, and optionality.

Attachment: *None*

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Question: 89) Regarding the rebuttal testimony of DTEE witness A. Willis (AW-24-rebuttal thru AW-27-rebuttal):

c) Witness Willis states that "These are, and should remain, optional (non-pilot) rates. Is it the Company's position that commercial TOU rates should never be made the default rates for commercial customers?

Answer: The Company has not taken a position. Refer to the rebuttal of Company Witness Willis (Pg 27) "It would be exceptionally premature to begin any discussion of requiring these rates when the Commission has yet to approve their basic structure and there are currently no customers enrolled on them."

Attachment: *None*