



VIA ELECTRONIC FILING

September 17, 2024

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

Re: Case No. U-21534

Dear Executive Secretary Felice:

Attached for electronic filing in the above-referenced proceeding please find the Exhibit List and Official Exhibits of Electrify America, LLC.

Please contact the undersigned if you have any questions or concerns regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read 'SMB', written over a horizontal line.

Stephen Bright, Esq.
Electrify America, LLC
1950 Opportunity Way, Suite 1500
Reston, Virginia 20190
Phone: (781) 206-7979
Steve.Bright@electrifyamerica.com

cc: Service List, Case No. U-21534

EXHIBIT LIST OF ELECTRIFY AMERICA, LLC

Rebuttal Testimony of Electrify America, LLC

Witness	Exhibit	Description
Rhiannon Davis	Exhibit EA-3 (EA-RD-2)	Compiled Responses of Michigan Public Service Commission Staff to EVgo's First Discovery Request

Direct Testimony of Electrify America, LLC

Witness	Exhibit	Description
Rhiannon Davis	Exhibit EA-1 (EA-RD-1)	Compiled Discovery Responses
Jigar J. Shah	Exhibit EA-2 (EA-JJS-1)	Compiled Discovery Responses

MPSC Case No: U-21534

Requester: Evgo

Question No.: EVgoDE-1.5

Respondent: P. Bennett

Page: 1 of 1

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

Requester: Evgo

Question No.: EVgoDE-1.12

Respondent: P. Bennett

Page: 1 of 1

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*

MPSC Case No: U-21534

Requester: EA

Question No.: EADE-1.3a

Respondent: A. Willis

Page: 1 of 1

Question: Refer to the testimony of DTE Witness Willis at page AW-34, lines 16-20, and AW-35, lines 1-9. Please clarify the following regarding DTE's proposed EV fast charger rate:

a. Will EV fast charger customers (as defined by DTE) be required to take service under the proposed rate?

Answer: No. The Company is not proposing that the rate be implemented in this case and did not propose a corresponding tariff be approved. As such the Company has not made any proposal regarding the applicability or requirements of the rate.

Attachment: None

MPSC Case No: U-21534

Requester: Evgo

Question No.: EVgoDE-1.7

Respondent: P. Bennett

Page: 1 of 1

Question: Please refer to the testimony of witness Bennett, page PB-51, lines 8-12, where the Company states it will no longer waive CIAC beyond revenue credits from its existing line extension policy “[c]onsistent with providing positive rate impacts and affordability benefits accruing to all customers.” Please provide any analysis the Company conducted or consulted underlying its assertion that no longer waiving CIAC beyond revenue credits from its existing line extension policy would “provide rate impacts and affordability benefits accruing to all customers.”

Answer: DTE Electric estimated that waiving CIAC beyond revenue credits from its existing line extension policy would lead to 15% of the total capital required for customer connections, based on historical data, needing to be funded through electric rates by other customers.

As the Company transitions from a pilot to a permanent Transportation Electrification program, the CIAC policy for EV customers should be the same as for all other customer connections.

Attachment: *None*

MPSC Staff's Answer to the EVgo's First Discovery Request

MPSC Case No. U-21534

August 9, 2024

Question:

1b: Please identify the “past rebate programs” mentioned in the second sentence of the referenced portion of Mr. Freeman’s testimony, and provide the budget or cost recovery request associated with those “past rebate programs.”

Answer:

The “past rebate programs” refer to DTE Electric witness Kelsey Peterson’s testimony in U-21297. Specifically, I am referring to her Tables 1 and 2 on pages 5-6 of her testimony.

Respondent: Al Freeman

MPSC Staff's Answer to the EVgo's First Discovery Request
MPSC Case No. U-21534
August 9, 2024

Question: 2b. Is it Mr. Freeman's position that DTE should reduce its proposed budget for Business and eFleet Charger rebates in 2026, 2027 and 2028 (described at Table 9 of DTE witness Bennett's testimony) by the amount of his recommended disallowance? If the answer is anything other than "yes", please explain Mr. Freeman's position on DTE's proposed investment in Business and eFleet Charger rebates in 2026, 2027 and 2028.

Answer:

My position is that DTE Electric should reduce its proposed budget for the Business and eFleet Charger Rebates for the bridge and test years specified in the Case No. U-21534. DTE Electric is welcome to revisit this issue in their next rate case. The EV marketplace is evolving and in the future larger rebates may be appropriate at that time.

Respondent: Al Freeman

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 supply of : ALJ Sally Wallace
electric energy, and for miscellaneous :
accounting authority. :

PROOF OF SERVICE

On September 17, 2024, an electronic copy of the Exhibit List and Official Exhibits of Electrify America, LLC was served on the following via email. I hereby verify that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Sincerely,



Stephen Bright, Esq.
Electrify America, LLC
1950 Opportunity Way, Suite 1500
Reston, Virginia 20190
Phone: (781) 206-7979
Steve.Bright@electrifyamerica.com

<p><u>Administrative Law Judge</u> Honorable Sally L. Wallace Wallaces2@michigan.gov</p> <p><u>The City of Ann Arbor</u> Valerie Jackson Valerie J.M. Brader vjackson@a2gov.org valerie@rivenoaklaw.com</p> <p><u>Attorney General Dana Nessel</u> Joel B. King Kingj38@michigan.gov ag-enra-spec-lit@michigan.gov</p> <p><u>DTE Electric Company</u> Jon P. Christinidis Andrea E. Hayden Paula Johnson-Bacon John A. Janiszewski Breanne K. Reitzel Jon.christinidis@dteenergy.com Andrea.hayden@dteenergy.com Paula.bacon@dteenergy.com John.janiszewski@dteenergy.com Breanne.reitzel@dteenergy.com mpscfilings@dteenergy.com</p> <p><u>Michigan Environmental Council (MEC)</u> <u>Natural Resources Defense Council (NRDC)</u> Christopher M. Bzdok Tracy Jane Andrews chris@tropospherelegal.com tjandrews@tropospherelegal.com</p> <p><u>Great Lakes Renewable Energy Association</u> Don L. Keskey Brian W. Coyer donkeskey@publiclawresourcecenter.com bwcoyer@publiclawresourcecenter.com</p>	<p><u>MPSC Staff</u> Amit T. Singh Heather M.S. Durian Michael J. Orris Monica M. Stephens Lori Mayabb Singha9@michigan.gov durianh@michigan.gov orrism@michigan.gov stephensm11@michigan.gov mayabbl@michigan.gov</p> <p><u>Michigan Energy Innovation Business Council</u> <u>Institute for Energy Innovation</u> <u>Advanced Energy United</u> <u>The Foundry Association of Michigan</u> <u>Energy Michigan, Inc.</u> Laura A. Chappelle Timothy J. Lundgren Justin K. Ooms lochappelle@potomaclaw.com tlundgren@potomaclaw.com jooms@potomaclaw.com</p> <p><u>PROTEC</u> Michael J. Watza Mike.watza@kitch.com</p> <p><u>Walmart, Inc.</u> Melissa M. Horne mhorne@hcc-law.com</p> <p><u>UWUA Local 223</u> Benjamin King bking@michworkerlaw.com</p> <p><u>The Kroger Co.</u> Kurt J. Boehm Jody Kyler Cohn Justin Bieber kboehm@bkllawfirm.com jkylercohn@bkllawfirm.com jbieber@energystrat.com</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

EVgo Services, LLC

Nikhil Vijaykar
David Nacht
Alicia Zaloga
Lindsey Stegall
Michael G. Oliva
nvijaykar@keyesfox.com
dnacht@nachtlaw.com
azaloga@keyesfox.com
lindsey.stegall@evgo.com
moliva@fosterswift.com

Association of Businesses Advocating Tariff

Equity (ABATE)

Stephen A. Campbell
Michael J. Pattwell
scampbell@clarkhill.com
mpattwell@clarkhill.com

Environmental Law & Policy Center (ELPC)

Union of Concerned Scientists, Inc.

Vote Solar

The Ecology Center

Nicholas N. Wallace
Daniel Abrams
Alonda Estrada
nwallace@elpc.org
dabrams@elpc.org
aestrada@elpc.org

Soulardarity

We Want Green, Too

Amanda Urban
Mark N. Templeton
Jacob R. Schuhardt
D. Samuel Heppell
Madison S. Wilson
t-9aurba@lawclinic.uchicago.edu
templeton@uchicago.edu
jschuhardt@uchicago.edu
heppel@uchicago.edu
madisonwilson@uchicago.edu

Electrify America, LLC

Jennifer Morante
Stephen Bright
Krystal D. Hermiz
jmorante@grsm.com
steve.bright@electrifyamerica.com
khermiz@grsm.com

Michigan Cable Telecommunications Association

Sean P. Gallagher
sgallagher@fraserlawfirm.com

International Transmission Company

Richard J. Aaron
Olivia R.C.A. Flower
Hannah E. Buzolits
Courtney F. Kissel
raaron@dykema.com
oflower@dykema.com
hbuzolits@dykema.com
ckissel@dykema.com

Intervenor EVgo Services LLC

Michael G. Oliva
moliva@fosterswift.com