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October 3, 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* Initial Brief 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 rates, amend its rate)
schedules and rules governing)
distribution and supply of electric)
energy, and for miscellaneous)
accounting authority.)

Case No. U-21534

INITIAL BRIEF OF INTERNATIONAL TRANSMISSION COMPANY
d/b/a ITC TRANSMISSION

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On March 28, 20224 DTE Electric Company (“DTE” or the “Company”) filed a request for authority to increase its rates and amend its rate schedules and rules governing the distribution and supply of electric energy pursuant to MCL 460.6 *et seq.*, and various Michigan Public Service Commission (“Commission”) orders (the “Application”). Consistent with the schedule adopted in this case, International Transmission Company d/b/a ITC *Transmission* (“ITCT”), by and through its attorneys, files this Initial Brief before the Commission to respond to DTE’s Application seeking increased revenues for its electric business.

INTRODUCTION

The cornerstone of this rate case is to ensure that DTE charges customers “just and reasonable rates that are fair to both ratepayers and the company.” *In re Detroit Edison Co*, December 23, 2008 Commission Opinion & Order in Case No. 15244, p 11. In turn, public utilities are entitled to the opportunity to earn a reasonable rate of return on their investments. *ABATE v Pub Servs Comm*, 430 Mich 33, 39 (1988). ITCT’s participation in this case is generally limited to its support for DTE’s Charging Forward electric vehicle (“EV”) public Charging Hubs program and its investment in Blackstart Resources within Local Resource Zone 7.

Electric vehicle deployment continues to grow in Michigan and rates of EV adoption are projected to increase steadily over the next decade. Energy providers, automobile manufacturers, state and local governments, and private businesses are all looking to plan for this inevitable shift. DTE’s public Charging Hubs program is a modest investment as part of its rate case that will yield important information and help Michigan plan for an electrified future. The Charging Hubs pilot program would include distribution

assets owned by DTE and be implemented as a joint project between ITCT and DTE. ITCT would provide necessary high-voltage transmission support. ITCT supports the Charging Hubs program and its continuation. The Charging Hubs pilot program continues to make promising strides in a cutting-edge area of electrification development. DTE demonstrates in the record that it is making progress with stakeholder engagement and commits to annual status reports to update the Commission on its progress.

STATEMENT OF THE RELEVANT FACTS

DTE's Rate Case - Pursuant to MCL 460.6a(1) and the Commission's May 18, 2023 Order in Case No. U-18238, DTE issued its filing announcement indicating its intent to file an Application requesting authority to increase its electric distribution rates and for other requested relief on December 28, 2023. In its filing announcement, DTE indicated that the Application would be filed on or around March 1, 2024.

DTE submitted its rate case summary to the Commission on March 25, 2024. In this summary, DTE disclosed that it would be requesting that the Commission authorize it to adjust its retail rates for the generation and distribution of electricity to provide additional revenue in the amount of approximately \$456.4 million annually based on a January 1, 2025 through December 1, 2025 projected test year. DTE also disclosed that it planned on requesting a Return on Equity of 10.5 percent. In its summary, DTE provided that it would be "proposing several pilot programs in this filing pertaining to electric vehicle charging, distribution non-wire alternatives, battery energy storage, demand response initiatives." March 25, 2024 Rate Case Summary at 5.

ITCT's Intervention – The Administrative Law Judge (“ALJ”) ordered a prehearing to be held on April 26, 2024 at 10:00 A.M. Any person wishing to intervene and become a party to the case was required to file a petition to intervene with the Commission by April 19, 2024. ITCT filed a petition to intervene on April 19, 2024 and attended the prehearing conference on April 26, 2024. No party objected to ITCT's intervention. The ALJ granted intervention to ITCT to participate as a full party to the case at the prehearing conference on April 26, 2024.

Charging Hubs Program – In U-20836, DTE requested “\$2.8 million to begin the design and construction on up to two Charging Hubs,” subject to certain conditions. (U-20836, 7 TR 2444). DTE developed six buildout criteria that must be met before the Charging Hubs program could be implemented:

- Locations with sufficient DTE system capacity;
- At least 1,500 medium-duty (“MD”) or heavy-duty (“HD”) fleet vehicles registered in surrounding zip codes within three miles of the site;
- Within two miles of a major roadway with at least 2,000 average daily traffic of commercial vehicles;
- Sufficient land available to install several Direct Current Fast Charger (“DCFCs”);
- An MOU with at least three customers showing intent to utilize the hub; and
- In or near a non-attainment zone for the criteria pollutants. (U-20836, 7 TR 2444.)

Once these criteria are met, DTE contemplated the following design features of the Charging Hubs.

DTE would build, own, operate, and maintain sites with several high-powered DCFCs at appropriate sites when certain buildout criteria are met to justify the investment. The Charging Hubs would be primarily designed to serve multiple customers with Class 3-6 [MD] and/or Class 7-8 [HD] fleet EVs, while also being available to light duty passenger vehicles. The design and size of the Charging Hubs could vary based on the expected demand, but in general, the Charging Hubs will have approximately 12 DCFCs between 150kW and 350kW to start. Similar to truck stops, the charging spaces will be covered by a canopy to protect drivers from the elements with a restroom and vending facility available for convenience. (U-20836, 7 TR 2441-2442.)

The purpose of the Charging Hubs program as introduced was to increase electrification among MD and HD vehicles and to gain key data from the program such as: the impacts on DTE's customer base; EV adoption impacts (compared to customers without access to a Charging Hub); the optimal design of Charging Hubs (including charger quantities and power outputs, usage fees, and locations); and best practices for managed charging and/or peak-shaving solutions at a high-powered commercial site. (U-20836, 7 TR 2445.)

The Commission granted DTE's request in U-20836, but attached certain conditions to that approval:

The Commission, though reluctant to allow distribution utilities such as DTE Electric to enter the competitive EV charging market, finds the ALJ's recommendations to be well-reasoned and supported in the record. Accordingly, the Commission adopts the ALJ's findings and conclusions on this issue and approves the charging hubs pilot. However, approval of the limited charging hub pilot should not be viewed as an alternative to the company playing a more active role in facilitating the development of third-party owned charging hubs, and the Commission urges the company's continued collaboration with the Staff and third parties to further the public's ability to access and analyze distribution system capacity data. Therefore, the Commission encourages the company to refer to the Commission's directives on hosting capacity maps set forth in the September 8 order, where the Commission states that it is appropriate to seek information on utilities' distribution systems and "to look at Michigan utilities' HCA [hosting capacity analysis] go/no-go maps and improvements that can be made by using the distribution system data and hosting capacity maps of utilities in

other jurisdictions as models to emulate.” September 8 order, p. 67. The Commission urges the company’s continued cooperation with the Staff and stakeholders through the Distribution System Data Access workgroup to improve the company’s existing capacity maps. As noted by intervenors in this case, improvements should include, along with hosting capacity data for DERs, the inclusion of load serving capacity data which can be of particular use to the developers of EV charging infrastructure. The company should also incorporate best practices from industry peers in terms of the level of granularity, accessibility, exportability, and data refresh rates. [November 18, 2022 Commission Order in U-20836 at 338-339.]

DTE received approval to construct up to two Charging Hubs in U-20836. (U-21297, 4 TR 738.) In U-20836, DTE received approval for \$2.8 million in the bridge period.

In U-21297, DTE sought to expand the Charging Hubs program by adding another Charging Hub conditioned on receipt of grant funding. (U-21297, 4 TR 739-740.) The Commission denied this request and in U-21297 DTE received approval for \$2.66 million continued spending on the two previously-approved Charging Hubs. December 1, 2023 Commission Order in U-21297 at 269.

In its last rate case, U-21297, the Commission ordered that “DTE should direct its attention to completing the two in-progress charging hubs, providing third-party developers with accurate capacity mapping, and facilitating the development of third-party owned charging hubs that will support fleet charging.” *Id.*

Blackstart Resources – In its last rate case, U-21297, the Attorney General and the Association of Businesses Advocating Tariff Equity (“ABATE”) argued for full disallowance of Blackstart Resource project costs due to allegations of lack of transparency regarding those costs. (U-21297, 4 TR 1126-1128, 7 TR 4366.) The Commission rejected this request and approved the Blackstart Resource projects subject to certain reductions to reflect historical actual spending as proposed by Staff. December 1, 2023 Commission Order in U-21297 at 43-44. The Commission ordered the inclusion

of the Blackstart Resource projects in rate base and was “persuaded of the importance of these projects in maintaining grid security and that the information provided on the record was sufficient to justify recovery.” (*Id.*) The Commission determined that DTE had demonstrated that it had full management approval for the projects and had completed substantial work on the same. (*Id.*)

SUMMARY OF POSITIONS

Charging Hubs - The Commission should approve DTE’s expansion of its electrification efforts, including extension of the Charging Hubs pilot between DTE and ITCT, with no disallowances. The program is small in scale but provides an opportunity to collect key data that can inform future EV charging infrastructure within the state. ITCT’s transmission infrastructure will be instrumental to any EV charging hub program, and ITCT is best suited to work directly with DTE to implement this pilot in a cost-effective manner. DTE has demonstrated that it is making progress in stakeholder engagement and is on the way to putting the Charging Hubs into commission.

Blackstart Resources - ITCT supports DTE’s efforts to maintain the security of Michigan’s electric grid, particularly through the development of Blackstart Resources to replace retiring assets. ITCT requests that the Commission approve the remaining costs for these projects in full without disallowance or further conditions.

SUMMARY OF RELEVANT PROVISIONS OF THE RECORD

Charging Hubs Program

DTE: Witness Bennett’s testimony provides the framework of the Company’s EV charging proposal, including the Charging Hubs pilot. (6 TR 1928.) DTE requests \$1.9 million for bridge period costs and \$3.5 million for projected test period costs. (*Id.*)

Witness Bennett describes the ongoing collaboration and grant-seeking activities of the Company during the bridge period and outlines a plan for launching an RFP for the start of site design and engineering in 2024. (*Id.*) Construction is set to begin in 2025.

On rebuttal, witness Bennett responded to MPSC Staff's concerns regarding project delays. (6 TR 1993-1994.) Witness Bennett explained that the delays are in part due to the time required to submit grant applications in coordination with the State of Michigan's Office of Future Mobility and Electrification ("OFME") and Daimler Truck North America ("DTNA"). (*Id.*) DTE also received an \$8.5 million Rebuilding American Infrastructure with Sustainability and Equity Grant for the project with the OFME. (*Id.*) However, this led to a six-month delay because that grant money cannot be used until it receives final state budget approval. (*Id.*) In the interim, DTE has been working with project partners to execute agreements that define roles and responsibilities, the scope of the work and other financial and operational details. (*Id.*) In response to the request from Staff, Witness Bennett agreed that DTE should provide a Charging Hubs update in its annual EV Status Report. (*Id.*)

ITCT: ITCT supports DTE's electrification efforts and the extension of the Charging Hubs program. (6 TR 4747.) ITCT notes that collaboration amongst DTE, ITCT, the Commission, and third-party electric vehicle supply equipment ("EVSE") charging providers will be essential to ensuring that charging infrastructure is built out in a manner that best utilizes available capacity on the grid, ensures reliable service, minimizes the cost of infrastructure and provides equitable access to EV charging to all communities in DTE's service territory. (6 TR 4746.)

ITCT also discusses how the Charging Hubs program supports Governor Whitmer's MI Healthy Climate initiative to support two million EV's on Michigan's roads by 2030. (6 TR 4747.) ITCT notes that this goal will also be supported by Tranche 2 of MISO's Long Range Transmission Planning ("LRTP") initiative that will be to maintaining reliability in the 10 to 20 year-out timeframe. (6 TR 4748.) Conventional resource retirements and the transmission to renewable generation is occurring at a more rapid pace than anticipated—10 years sooner than MISO's initial forecasts at the outset of the LRTP initiative. (*Id.*) ITCT asserts that maintaining system reliability and affordable electric service through access to a broad network of generation resources is critical for EV adoption to continue and accelerate—there cannot be uncertainty with respect to cost or reliability if owners are to continue to invest in EVs. (6 TR 4749.) Regional transmission initiatives, like the LRTP Tranche 2 projects, will support the Governor's goals for widespread adoption of EVs and electrification in a renewable energy-based future by providing essential reliability services beyond what local resources are able to provide. (6 TR 4748.)

ITCT believes DTE's proposal to extend the Charging Hubs pilot is a reasonable approach to spur additional fleet electrification in Michigan. (6 TR 4308.) The state needs to make progress on EV infrastructure development with the anticipated number of EVs coming to market in Michigan. (*Id.*)

ITCT did not file rebuttal testimony on this issue.

MPSC Staff: In testimony, Staff witness Freeman articulates increasing concern about the Charging Hubs Program (6 TR 5084.) Specifically, that the Charging Hubs are still in the design and planning stage after being first approved by the Commission in

November 2022. (*Id.*) Staff found the details about the Charging Hub program submitted by DTE on direct to be insufficient. (*Id.*) Staff requests that DTE “either offer a more complete Charging Hub analysis and explanation in its reply testimony or hold an interested parties meeting to discuss why there has been such slow momentum to this pilot.” (*Id.*) Staff also “expects a much more thorough Charging Hub’s explanation in both the Company’s next rate case and its EV annual report.” (*Id.*)

Staff did not file rebuttal on this issue.

Blackstart Resource Projects

DTE: DTE witness Guillaumin provides details regarding the Blackstart Resource projects for which DTE is seeking recovery in this case. (6 TR 1627-1630, 1701-1704.) These details include the general timeline for spending, the type of Blackstart Resource project, and the remaining work left to be completed on each project. (*Id.*)

In rebuttal, DTE witness Guillaumin responds to the use of monthly work scoping plans to project forecasted spend, as MPSC Staff does in this case. (6 TR 1728.) Witness Guillaumin explains that “there can be monthly timing variances within the project execution that shift spend between months across the duration of the project.” (*Id.*) However, these monthly shifts do not change the overall projected spend for the project— it just means the work has been or will be completed sooner or later than initially forecasted. (*Id.*) DTE asserts that the “total result of a project is the proper basis for scrutiny, not the day-by-day or month-by-month journey of project planning and execution.” (6 TR 1729.)

ITCT: ITC witness Chindhade gives important context to what a Blackstart Resource project is, why they are required, and how they are at risk in Michigan.

First, witness Chindhade explained why Blackstart Resources are required and what standards apply. (6 TR 4753.) Each Transmission Operator (“TOP”) is required to have a system restoration plan (“SRP”) under NERC standards. (*Id.*) NERC requires TOPs (such as ITCT) to have an SRP allowing for restoration of that TOP’s System following a disturbance in which one or more areas of the BES shuts down. (*Id.*) Blackstart Resources are a key component to a TOP’s SRP, as they allow for the restart of a shut-down portion of the grid. (*Id.*) A blackstart unit is one that can start on its own power without support from the grid in the event of a major grid event, such as the 2003 blackout. (6 TR 4754.) NERC’s current requirement is found in EOP-005-3, which generally requires Transmission Operators to develop and implement a restoration plan approved by the Reliability Coordinator (i.e., MISO). (6 TR 4753.) EOP-005-3 also contains requirements for the entities operating the generators identified as Blackstart Resources in a restoration plan. (*Id.*) Due to the federal and state regulatory limitations placed on ITCT and its independent nature, ITCT is prohibited from owning generating facilities. (*Id.*) Thus, it is necessary for ITCT to partner with generation owners, such as DTE, to establish the required Blackstart Resources. (*Id.*)

Witness Chindhade also explained why Blackstart Resources are an important collaboration between distribution and transmission energy providers. Blackstart Resources are procured through contracts with generation owners to complete and maintain a viable SRP. (6 TR 4754.) Blackstart Resources are essential to establishing grid control and restarting power plants following a grid blackout and are critical to the

safety and resilience of the grid, public safety, and the economy. (*Id.*) Construction of DTE's Blackstart Resources are nearly complete, and DTE has requested approval of the remaining funding for Blackstart Resources that support ITC's SRP. (*Id.*) Local Resource Zone 7 is losing a number of Blackstart Resources due to generation retirements. Blackstart resources are and will continue to be critical for ITC's SRP in DTE's service territory. (*Id.*)

On direct, ITCT supported the confidential treatment of information related to Blackstart Resources and requested that the Commission approve the remaining costs for these projects in full without disallowance or further conditions. (6 TR 4755.)

In rebuttal, ITCT witness Chindhade responds to the arguments of the MPSC Staff and ABATE witnesses. (6 TR 4757.) In response to MPSC Staff, witness Chindhade points out that Blackstart capable generation resources should be considered a high priority asset and essential to the energy infrastructure of the state, Local Resource Zone 7, and the region. (*Id.*) ITCT asserts that the Commission should support the Blackstart Projects as an essential component to the state's energy security, particularly as our grid becomes increasingly complex and blackstart resources are retired. (*Id.*) With regard to ITCT's response to ABATE, ITCT reiterates that the Commission should remain consistent with its position in U-21297 and support the confidentiality of information pertaining to the Blackstart Resource projects. (6 TR 4758.)

MPSC Staff: MPSC Staff witness DeCooman recommends a 14 percent disallowance for the DTE's capital expenditure requests for the Blackstart Projects. (6 TR 5050-5054.) According to MPSC Staff "it is unreasonable to support the requested

amounts when the Company has consistently overestimated costs for the Blackstart Projects.” (6 TR 5053.)

ABATE: ABATE witness York recommends that the Commission “[d]isallow all projected capital expenditures associated with the [Blackstart Projects] from rate base.” (6 TR 3351.) ABATE argues that “ratepayers should not be responsible for unsubstantiated costs that have not been demonstrated to be reasonably likely to be incurred by DTE in the bridge period or projected test year.” (6 TR 3352.) ABATE looks to two of the Blackstart Project and in turn takes issue with redactions on confidential documents, which it argues inhibited its ability to “independently review and assess the scope of this project, project timelines, or any revisions that have occurred.” (6 TR 3353-3354.)

ARGUMENT

ITCT advocates viewing the electric grid as a unified system and keeping transmission planning in mind when approving utility rate cases. The investments that DTE makes as a result of this case will have an impact on the reliability of the transmission system and Michigan’s preparedness for an electrified future. In light of these impacts, Commission should approve DTE’s proposed extension of its Charging Hubs pilot program and approve DTE’s continued investment in the Blackstart Resource projects.

I. The Commission Should Approve DTE’s Request to Extend the Charging Hubs Program.

The \$3.5 million requested for the Charging Hubs program represents less than 1 percent of the annual revenue that DTE is requesting in its general rate case. This figure is relatively modest compared to some of the larger costs that make up DTE’s rates, and, as ITCT pointed out in DTE’s prior rate cases, the potential insights that could be gained from this program eclipse its small cost. While these benefits have yet to be fully realized, this pilot program provides a valuable learning opportunity for DTE, ITCT, the Commission, and EVSE charging providers.

No party to this case disputes Michigan’s inevitable electrified future. The record reflects that this electrification will likely come sooner than anticipated. (6 TR 4748.) Indeed, Renewables are projected to reach 30% system-wide penetration—an inflection point for operational complexity—10 years sooner than what was forecast in the first series of MISO futures scenarios. (*Id.*) Governor Whitmer has also established a goal to build the infrastructure needed to support two million EVs on Michigan roads by 2030. (6 TR 4747.) This 2030 timeframe converges with current state and utility goals to generate roughly sixty percent of the state’s electricity from renewable resources and phase out the state’s remaining coal-fired power plants. (*Id.*) Taken together, these goals require significant expansion of the transmission network in Michigan and throughout the MISO region by the end of this decade and into the 10-20 year-out timeframe. (*Id.*) Strategic partnerships such as the Charging Hubs program will help to respond to these changing needs, but so will important investment in the transmission system.

The MISO's LRTP initiative is designed to meet these growing reliability, safety and electrification needs. Tranche 2 of the LRTP will be an important step to meet the needs to operate decentralized generation fleets and sufficient access to geographically diverse generator resources. (6 TR 4748.) In a future that depends on intermittent renewable energy sources like wind and solar, it is critical that we are able to manage reliability risks associated with low local resource availability and high demand. (*Id.*) Regional transmission expansion is the only way to manage changing generation and weather risks while ensuring reliability throughout the resource transition. (*Id.*) These reliability concerns must also be balanced against affordability and the ability of the state to access low-cost energy resources. (6 TR 4749.)

DTE has addressed the concerns of MPSC Staff on the record and these concerns should not form the basis of a disallowance of Charging Hubs costs. (6 TR 1993-1994.) DTE explained the delays regarding the construction of the Charging Hubs program and the desire to maximize the economic opportunities available to the state. (6 TR 1994.) DTE has agreed to provide further information through an annual reporting mechanism and appears willing to increase transparency for the pilot. (*Id.*) These projects take time, effort, and the coordination of a number of governmental and stakeholder organizations. (*Id.*) Given the progress that DTE has shown thus far, the Commission should continue to support the Charging Hubs program and approve the pilot proposal again, without disallowance or further conditions.

II. The Commission Should Support DTE's Investment in Blackstart Resources in Local Resource Zone 7.

In this case, DTE has requested approval of funding for three blackstart projects that support ITC's SRP, as required by NERC. A blackstart unit is one that can start on

its own power without support from the grid in the event of a major grid event (6 TR 4753), such as the 2003 blackout; which estimates suggest cost the U.S. economy between \$4 and \$10 billion, and the Detroit area alone \$220 million. (6 TR 4754.) Blackstart resources are essential to establishing grid control and restarting power plants following a grid blackout and are critical to the safety and resilience of the grid, public safety, and the economy. (*Id.*) Consistent with DTE's last rate case, the generation fleet continues to undergo an unprecedented transformation, blackstart resources are being lost due to conventional generation retirements across the nation. DTE's investments will ensure that Michigan is prepared for any unforeseen system disturbances through a reliable and resilient SRP. (6 TR 4754-4755.) ITCT supports the full funding of these projects as requested by DTE.

ABATE's arguments echo those that the Commission declined to adopt in DTE's last rate case. ABATE continues to complain about its ability to fully independently verify the confidential spending figures and projections related to the Blackstart Resources. As the Commission recognized in DTE's last rate case, there are limitations regarding the information that DTE is able to share on these projects, as they contain highly confidential critical energy infrastructure information. DTE has provided significant detail regarding the three projects and the progress of their construction. (6 TR 1627-1630, 1701-1705.) These blackstart resource projects are intended for use in critical grid events and preserving the security of these resources is of paramount importance. There is no change in circumstance or compelling reason for the Commission to depart from its holding in U-21297, finding that even without the confidential information, there was ample information on the record to support the costs of the Blackstart Resource projects.

ITCT requests that the Commission approve the costs for these projects in full without disallowance or further conditions.

CONCLUSION

The Commission should continue its support for electrification and reliability efforts across the state of Michigan as well as its support of transmission planning efforts. ITCT respectfully requests that this Honorable Commission: (1) approve DTE's Charging Hub program as proposed by the Company, with no disallowances or further conditions; (2) approve the Blackstart Resource projects as proposed by DTE, with no disallowances or further conditions, and (3) grant such further and additional relief as may be lawful and proper.

Dated: October 3, 2024

Respectfully submitted,

DYKEMA GOSSETT PLLC

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**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) Case No. U-21534
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 3rd day of October, 2024, she served International Transmission Company d/b/a ITC*Transmission's* Initial Brief and Proof of Service on the parties listed on the attached service list via electronic mail.

Melissa A. Goodrich

SERVICE LIST
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