

MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
PUBLIC SERVICE COMMISSION

ENTRY OF APPEARANCE IN AN ADMINISTRATIVE HEARING

This form is issued as provided for by 1939 PA 3, as amended, and by 1933 PA 254, as amended. The filing of this form, or an acceptable alternative, is necessary to ensure subsequent service of any hearing notices, Commission orders, and related hearing documents.

General Instructions:

Type or print legibly in ink. For assistance or clarification, please contact the Public Service Commission at 517-284-8090.

*Please Note: The Commission will provide **electronic** service of documents to all parties in this proceeding.*

THIS APPEARANCE TO BE ENTERED IN ASSOCIATION WITH THE ADMINISTRATIVE HEARING:

Case / Company Name: _____ Docket No. U-_____

Please enter my appearance in the above-entitled matter on behalf of:

1. (Name)
2. (Name)
3. (Name)
4. (Name)
5. (Name)
6. (Name)
7. (Name)

Name _____

Address _____

City _____ State _____

Zip _____ Phone _____

Email _____

Date _____

Signature: Valerie Brader

I am not an attorney

I am an attorney whose:

Michigan Bar # is P-_____

_____ Bar # is: _____
(state)

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of
CONSUMERS ENERGY COMPANY for U-21859
Ex Parte Approval of Certain Amendments to
Rate GPD.

**PETITION TO INTERVENE OF
SWITCH, LTD.**

Switch, Ltd., a Nevada limited liability company (“Switch”), operates an existing data center that is a customer of Consumers Energy Company, which proposed a tariff alteration in this matter. Switch petitions the Michigan Public Service Commission (“Commission”) for leave to intervene in the captioned proceeding pursuant to Mich. Admin Code, R 792.10410. In support of this motion, Switch states:

1. Switch is a technology infrastructure ecosystem company whose core business is the design, construction and operation of best-in-class data centers. Switch currently operates a data center campus in Michigan that is a current customer of Consumers and has a direct business relationship with Consumers.

2. Switch asks to be granted intervention by right, because the reporting requirements proposed by Consumers as outlined in the February 7, 2025 application to the Commission, if adopted, appear to require the disclosure of data related to Switch that would not be permitted under Consumers’ Tariff Rule C17. In other words, Switch, a current customer of Consumers, believes that the proposed tariff would materially alter its current terms of service.

3. Switch is able to participate in the proceedings to fully and completely advise the parties and the Commission of specific issues of fact and law. *See* Affidavit of Switch Senior Vice President of Power and Sustainability, Alise Porto (Exhibit A).

4. If the Commission is not persuaded Switch qualifies for intervention by right, then Switch (in the alternative to intervention by right) seeks permissive intervention. Switch can provide useful information and unique perspective regarding the desires, needs, and benefits of data centers, as it operates the sole large-scale data center in Michigan at this time. From its founding, Switch has been powered by 100% renewable energy and has a focus on sustainability and efficient technologies that make its exascale ecosystems the most sustainable and cost-effective colocation environment in the industry. The outcome of this docket may impact Switch's current and future business.

5. No other party adequately represents the interests of Switch.

6. Switch requests that all notices and pleadings be served on:

Valerie J.M. Brader
Rivenoak Law Group, P.C.
3331 W. Big Beaver Rd., Ste. 109
Troy, MI 48084

valerie@rivenoaklaw.com; and
ecf@rivenoaklaw.com.

For the reasons outlined above, Switch respectfully requests that the Commission grant Switch's petition to proceed as a party to this proceeding.

Dated: March 18, 2025

RIVENOAK LAW GROUP P.C.

By:



Valerie J.M. Brader
Attorney for Switch, Ltd.
3331 W. Big Beaver Rd.
Suite 109
Birmingham, MI 48084
Telephone: (248) 677-1045
Email: valerie@rivenoaklaw.com
ecf@rivenoaklaw.com

EXHIBIT A

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of
CONSUMERS ENERGY COMPANY for
Ex Parte Approval of Certain Amendments to Rate GPD. U-21859

AFFIDAVIT OF ALISE PORTO

1. I, Alise Porto, am the Senior Vice President of Power and Sustainability of Switch, Ltd. (“Switch”).
2. I have personal knowledge of the allegations in the Switch Petition to Intervene in this case.
3. The allegations in the Petition to Intervene are true to the best of my knowledge, information, and belief.
4. If called as a witness, I could competently testify to the facts in the Petition to Intervene.

Dated: March 12, 2025


Alise Porto

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the Matter of the Application of
CONSUMERS ENERGY COMPANY for
Ex Parte Approval of Certain Amendments to
Rate GPD.

U-21859

PROOF OF SERVICE

On the date below, an electronic copy of the **Petition to Intervene of Switch, Ltd.**
and Appearance by Valerie J.M. Brader was served on the following:

Name/Party	E-mail Address
ALJs – MPSC Katherine E. Talbot	talbotk@michigan.gov
ABATE Michael J. Pattwell Stephen A. Campbell James R. Dauphinais Jessica York	mpattwell@clarkhill.com scampbell@clarkhill.com jdauphinais@consultbai.com jyork@consultbai.com
Consumers Energy Bret A. Totoraitis Anne M. Uitvlugt Kelly M. Hall	mpsc.filings@cmsenergy.com bret.totoraitis@cmsenergy.com anne.uitvlugt@cmsenergy.com kelly.hall@cmsenergy.com
Data Center Coalition Michael G. Oliva Nikhil Vijakar	moliva@fosterswift.com nvijaykar@keyesfox.com
Michigan Attorney General Michael Moody Lucas Wollenzien	ag-enra-spec-lit@michigan.gov MoodyM2@michigan.gov WollenzienL@michigan.gov
MPSC Staff David W. Isakson Lori Mayabb	isaksond@michigan.gov mayabbl@michigan.gov

Microsoft Corp. Jennifer U. Heston	jheston@fraserlawfirm.com
Citizens Utility Board of Michigan; Michigan Environmental Council; Natural Resources Defense Council; Sierra Club Christopher M. Bzdok Tracy Jane Andrews Breanna Thomas	chris@tropospherelegal.com tjandrews@tropospherelegal.com breanna@tropospherelegal.com

The statements above are true to the best of my knowledge, information and belief.

Dated: March 18, 2025

RIVENOAK LAW GROUP P.C.

By:



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Attorney for Switch Ltd.
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