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April 9, 2025

Ms. Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 W. Saginaw Highway
P.O. Box 30221
Lansing, MI 48909

Re: **MPSC Case No. U-21471**

Dear Ms. Felice:

Attached for electronic filing in the above-referenced matter, please find the Reply Brief of the Michigan Energy Innovation Business Council, the Institute for Energy Innovation, and Clean Grid Alliance, together with the Proof of Service. Thank you for your assistance in this matter.

Very truly yours,

Justin K. Ooms

JKO/srd

Enclosure

c. All parties of record.

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the Application of MICHIGAN)	
ELECTRIC TRANSMISSION COMPANY, LLC)	
for an Act 30 certificate of public convenience and)	
necessity for the construction of a major transmission)	Case No. U-21471
line between Oneida Substation in Eaton County and)	
Nelson Road Substation in Gratiot County, Michigan,)	Case No. U-21472
and between the Indiana/Michigan state border at)	
Gilead Township in Branch County and the new Helix)	
Substation in Calhoun County, Michigan.)	
_____)	

REPLY BRIEF
OF THE
MICHIGAN ENERGY INNOVATION BUSINESS COUNCIL,
THE INSTITUTE FOR ENERGY INNOVATION
AND
CLEAN GRID ALLIANCE

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**REPLY BRIEF
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THE INSTITUTE FOR ENERGY INNOVATION
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I. INTRODUCTION

This Reply Brief is filed on behalf of the Michigan Energy Innovation Business Council (“Michigan EIBC”), the Institute for Energy Innovation (“IEI”) and Clean Grid Alliance (“CGA”; collectively with Michigan EIBC and IEI, “MEIC”)¹ by their attorneys, Potomac Law Group, PLLC. Except as may be expressly modified in this Reply Brief, MEIC continue to advocate the positions taken in their Initial Brief and hereby incorporate the responses to other parties’ positions already contained therein as if fully contained in this Reply Brief. Failure to address any issues or positions raised by other parties—or failure to repeat responses previously provided in MEIC’s

¹ The positions expressed in this Initial Brief represent those of the Michigan EIBC, IEI and United as organizations and not necessarily the views of individual members of these organizations with respect to any particular issue.

Initial Brief—should therefore not be taken as agreement with those issues or positions or as a waiver of any position previously taken in MEIC’s Initial Brief.

II. ARGUMENT

A. METC Correctly States that Staff’s Proposed Condition Exceeds the Commission’s Authority under Act 30.

The Staff recommend that the Commission condition approval of the two projects (the “Projects”) being evaluated in this proceeding on the approval of other projects within the Midcontinent Independent System Operator’s (“MISO”) Long-Range Transmission Plan (“LRTP”) Tranche 1. See 5 Tr 1188; Initial Brief of Staff in Case No. U-21471, Filing No. U-21471-0278 (“Staff Initial Br”), at 10, 15–18, 23–24, 26–30, 36–37, 57–59. Curiously, the Staff frame this condition as “ensur[ing] METC is held accountable to being able to deliver the promised benefits.” Staff Initial Br at 10; see also *id.* at 24 (noting that the condition is aimed at “ensur[ing] accountability”). As METC correctly points out, however, the fulfillment of the proposed condition is simply beyond its control:

Staff’s proposal would require METC to wait to construct the Projects until . . . the conclusion of out-of-state regulatory proceedings. As noted by METC witness Marshall, however, METC has no ability to take affirmative steps to ensure the outcome of these regulatory proceedings or include those proceedings in a meaningful way.

Initial Brief of Michigan Electric Transmission Company in Case No. U-21471, Filing No. U-21471-0280 (“METC Initial Br”), at 82.

This presents at least two additional problems² for Staff’s proposed condition, which are interrelated: First, METC cannot realistically be held “accountable” for delivering the full benefits of LRTP Tranche 1. Contingencies outside of its control must occur for the condition to be met.

² For a discussion of other shortcomings of this position, see, *e.g.*, the Initial Brief of MEIC in Case No. U-21471, Filing No. U-21471-0279 (“MEIC Initial Br”), at 28–32.

Thus, one of Staff's most prominent reasons for recommending the condition, *i.e.*, holding METC "accountable," is inconsistent with the means by which the condition would be fulfilled.

The second, more significant, problem is also more than likely the underlying reason for Staff's desire to frame the condition as a way to hold METC "accountable." Simply stated, Act 30 only authorizes the Commission to "condition its approval upon *the applicant taking additional action* to assure the public convenience, health, and safety and reliability of the proposed major transmission line." MCL 460.568(4) (emphasis added). By framing the condition as a way to hold METC "accountable," Staff's Brief appears implicitly to acknowledge this limitation in the statute.

The problem with Staff's overall proposal to condition approval here on approvals elsewhere is eloquently discussed by METC in its own Initial Brief:

Act 30 allows the Commission to condition its approval of a certificate "upon the applicant taking additional action to assure the public convenience, health, and safety and reliability of the proposed major transmission line." MCL 460.568(4) (emphasis added). The plain language of Act 30 authorizes the Commission to impose conditions in which the applicant can take affirmative actions to fulfill. *AG v Mich Pub Serv Comm (In re Ind Mich Power Co)*, 297 Mich App 332, 343; 824 NW2d 246 (2012) ("Administrative authority must be plainly granted, for doubtful power in this context does not exist.") This makes sense when reading Section 8(4) with other provisions. Specifically, Act 30 itself conditions the validity of a certificate on *the applicant* beginning construction within 5 years. MCL 460.568(7) ("If construction of a proposed major transmission line is not begun within 5 years of the date that a certificate is granted, the certificate is invalid and a new certificate shall be required for the proposed major transmission line.") A condition that depends on the actions of someone other than the applicant is clearly outside of the authority granted to the Commission by Act 30. *AG*, 297 Mich at 343 ("A statute that grants power to an administrative agency is to be strictly construed.")

Staff's condition is not based on affirmative action METC can take to ensure the "public convenience, health, and safety and reliability" of the Projects. Rather, Staff's proposal would require METC to wait to construct the Projects until other the conclusion of out-of-state regulatory proceedings. As noted by METC witness Marshall, however, METC has no ability to take affirmative steps to ensure the outcome of those regulatory proceedings or influence those proceedings in a meaningful way. 5 TR 329. And because Act 30 has an expiration date of a certificate, Staff's proposal may result in a significant delay in construction that would require METC to seek another certificate. See MCL 460.568(7). Staff's recommended condition is therefore not authorized by Act 30.

METC Initial Br at 82–83 (emphasis in original).

In sum, because METC has no control over other states’ regulatory approval processes, it cannot as a factual matter be “accountable” for ensuring that those approvals are received. Neither can the Commission, as a legal matter, condition an Act 30 certificate on the fulfillment of contingencies outside of METC’s control.

The Commission should thus reject Staff’s proposed condition on these bases as well as those already stated by MEIC, the Citizens Utility Board and Sierra Club, and METC in their respective Initial Briefs.

B. Staff Incorrectly Claim that Insufficient Analysis of the Project’s Benefits Absent the Rest of LRTP Tranche 1 has Been Provided.

In their Initial Brief, Staff assert,

The Company has not, nor has any other party offered any analysis to support the claim that these projects provide sufficient benefit absent the remaining portfolio of projects that connect to the Michigan projects for which METC seeks siting approval in this case. There has been no evidence entered into this case that identifies, analyses [*sic*], or illustrates a clear benefit to these projects absent the whole portfolio that justify the construction. The only benefit that is provided in this case that is exclusively related to these projects are those benefits related to the construction activity itself, not those benefits that justify actually constructing the Michigan projects.

Staff Initial Br at 27. Staff hasten to explain that “Staff witness Simpson does not testify conclusively that there are NO benefits with constructing these lines in isolation. However, witness Simpson does point out that no party to this case has included any *robust analysis* of quantifiable or non-quantifiable benefits that could be expected from these projects in isolation.” *Id.* at 28 (emphasis added).³

Contrary to these arguments, both METC and MEIC have demonstrated that the Projects would still provide benefits that justify their construction even absent the remainder of Tranche 1,

³ It is unclear from Staff’s Initial Brief what exactly Staff envisions the “robust analysis” be required to include.

even though requiring such a demonstration does not, in the final analysis, make either practical or legal sense.

1. METC and MEIC have Demonstrated that the Projects Provide Benefits Justifying Their Construction Even Absent the Remainder of Tranche 1.

It is simply not the case that no party has “offered any analysis to support the claim that these projects provide sufficient benefit absent the remaining portfolio of projects that connect to the [Projects].” Staff Initial Br at 27. Both MEIC witness Goggin and METC witness Marshall testified that many of the benefits that could be expected from the Tranche 1 projects as a whole could likewise be expected from the Projects on their own, including increasing interconnection capacity for renewable and clean energy projects, improving local grid reliability, and expanding Michigan’s access to out-of-zone capacity resources by increasing MISO Zone 7’s capacity import limit. As witness Marshall explained,

Expanding Michigan’s transmission system beyond our borders aids in increasing [Zone] 7’s . . . CIL, promoting reliability of Michigan’s system, supporting the growth of Michigan overall renewable generation portfolio, and bringing job and economic growth to the state.

[. . .]

The Projects are needed to strengthen the state’s overall transmission network, to reinforce the current grid to disperse imported capacity and reduce system congestion, and provide additional flexibility for future for system expansions.

5 Tr 324, 326. In similar fashion, Mr. Goggin stated,

[E]ven if just the Michigan portions of the Projects and the portion to the Hiple substation just across the border in Indiana are completed, Michigan will realize major benefits from increasing the ability to import energy, capacity, and renewable energy, as I outlined in my direct testimony. Even the Michigan portions alone would play an important role in addressing local reliability needs and facilitating in-state renewable interconnection.

5 Tr 905.

These benefits, included in METC’s and MEIC’s broader analysis of the benefits of the Projects, thus *remain even absent the approval of the remaining portions of Tranche 1*.⁴ It is therefore *not* true that these benefits are inadequately justified simply for having been *transferred* over from the analysis of Tranche 1 as a whole to an analysis of the Projects on their own. Staff thus cannot reasonably maintain their position that neither the Company “nor . . . any other party [has] offered any analysis to support the claim that these projects provide sufficient benefit absent the remaining portfolio of projects.”

2. It Makes No Practical Sense to Require an Independent Analysis of the Benefits of the Projects Without Considering the Balance of Tranche 1.

Although MEIC witness Goggin elected to go through the exercise of demonstrating the benefits of the Projects even absent the remainder of LRTP Tranche 1, his Rebuttal Testimony concluded by making one key point: it makes no practical sense to require such an analysis.

Two reasons support this assertion. First, power flows reaching Michigan are unlikely to depend on the construction of the remainder of Tranche 1, as alternative upgrades to achieve those power flows will likely be required in lieu of the other Tranche 1 lines:

NERC Standard TPL-001-5 requires transmission owners to conduct planning studies to ensure that power flows can be reliably accommodated. If a portion of Tranche 1 upgrades is not constructed, those transmission planning studies are likely to show that major upgrades of transmission lines and other equipment are necessary to prevent overloads or instability problems as the MISO resource mix changes and as neighboring portions of the Tranche 1 lines are constructed. Thus, the likely outcome if a portion of the Tranche 1 portfolio is not built is that the local transmission owner will be required to complete upgrades that accommodate a

⁴ The unit costs of reinforcing the current grid and promoting the reliability of Michigan’s system (see 5 Tr 324, 326), are, furthermore, much lower for the Projects than for potential local incremental alternatives, as MEIC witness Goggin explains in both his Direct and Rebuttal Testimony. See 5 Tr 854–855; see also 5 Tr 900. Costs for local alternatives would also not be regionally cost-shared, unlike the costs for the Projects. *Id.* Though Staff appears to belatedly attempt to cast doubt that such local alternatives would be required in the absence of the Projects (see Staff Initial Br at 29 (speaking in terms of “evaluating the “comparative costs to mitigating those future expected outcomes *if they do come to fruition*” (emphasis added))), this should simply be seen as an attempt to move the goalposts at the briefing stage, alleging uncertainty not just concerning other states’ regulatory approvals but concerning MISO’s own analysis and application of NERC’s Standard TPL-001-5. See Staff Initial Br at 29–30; 5 Tr 904–905 (Goggin Rebuttal).

similar power flow as the Tranche 1 lines. *As a result, if sections of the proposed Tranche 1 lines located outside of Michigan are not approved or built, that outcome should not significantly change the power flows reaching Michigan or its need for the Projects.*

5 Tr 904. Second, performing a standalone study of the individual benefits of a particular portion of Tranche 1 is impractical:

MISO and others have not studied pieces of Tranche 1 on a standalone basis, and it does not make sense to do that analysis as there are too many potential scenarios to evaluate. Evaluating scenarios in which each of the Tranche 1 projects gets approved or not yields 262,144 combinations of potential outcomes. Even conducting this analysis on a state-by-state basis for each of the nine states included in Tranche 1 yields 512 combinations of potential outcomes. Running the detailed studies used to design and evaluate the benefits of the Tranche 1 projects across hundreds of potential scenarios for combinations of regulatory approvals would be infeasible and a waste of limited planning resources.

5 Tr 905.

Considering these two points together, it is clear that project-by-project or state-by-state analyses are not only resource-intensive; they are also unlikely to yield much by way of analytically useful benefits. MEIC therefore submit that requiring METC to provide a “robust analysis” of the independent benefits of the Projects absent the balance of Tranche 1 is of little practical value.

3. Neither Act 30 nor Relevant Precedent Requires the “Robust Analysis” Demanded by the Staff.

MEIC surveyed the findings the Commission is required to make in evaluating an application for a certificate under Act in detail in Section II of their Initial Brief (*i.e.*, the “Legal Standard” applicable to this proceeding). This survey included a review and summary of the Commission’s previous explanations of the scope and content of its review, together with an analysis of the Michigan Court of Appeals’ opinion on the subject on appeal from the Commission’s decision in Case No. U-17041:

The Commission was also clear in Case No. U-17041 that the “need” analysis does not require a formal benefit/cost analysis. July 29, 2013 Order in Case No. U-17041 (“U-17041 Order”) at 22. It nonetheless noted that “the most straightforward way to demonstrate that a project’s benefits justify its construction . . . is through the submission of *at least some reasonable estimate* of the benefits of the project.” *Id.* [emphasis added].

In an opinion upholding the Commission’s granting of a certificate in Case No. U-17041, the Michigan Court of Appeals commented on the requirement to show a “need” for a transmission line under Act 30. It found no such requirement in Act 30:

The Landowners argued that METC did not prove that the proposed transmission line was needed. However, MCL 460.568(5) does not specifically state that an applicant for a proposed transmission line must prove that the line is needed. Nevertheless, the PSC found that METC’s proposed transmission line was needed to address a reliability issue.

...

The PSC correctly concluded that METC was not required to do a cost-benefit analysis of the Weeds Lake project, even though that project was estimated to cost \$32 million more than the [Landowner-alternative] fourth-transformer project. No statute required METC to perform a cost-benefit analysis, and the PSC was not required to make its judgment based solely on cost.

In re Application of Michigan Electric Transmission Co, 309 Mich App 1, 11–13; 867 NW2d 911 (2014). According to the court, therefore, and somewhat contrary to prior Commission precedent, the Commission is not in fact required by Act 30 to perform a need analysis, and an applicant is not required to prove that a proposed project is *per se* needed. The Commission’s discretion to approve a proposed project is broader than Commission precedent alone would indicate.

MEIC Initial Br at 4–5. MEIC’s Initial Brief continued:

Together, the need analyses in these three cases [U-14861, U-14933 & U-17041] illustrate that “transmission infrastructure can provide a host of benefits, both in economic and reliability terms, some of which are more easily quantifiable than others,” U-17041 Order at 24, and that, so long as conditions are such that economic and reliability benefits are more than hypothetical, and so long as costs are not out of proportion on account of unproven, experimental and higher-unit-cost designs or materials, the Commission has generally found the criterion in Section 8(5)(a) of Act 30 to be met.

Id. at 6–7.

As already thoroughly illustrated in briefing, therefore, Staff are attempting to hold the Company and the Projects to a standard not previously demanded of transmission lines proposed under Act 30. Act 30 simply nowhere requires the level of analysis Staff appear to desire, and neither the Commission nor even the Michigan Court of Appeals has required applicants under Act 30 to meet the vague but seemingly strict requirements Staff champion here.

In conclusion, the Company and intervenors, including MEIC, have clearly demonstrated the benefits of the Projects, including those resulting from their construction separate from the completion of the balance of LRTP Tranche 1. Staff's assertions to the contrary are therefore simply inaccurate. More than that, however, the Staff's preferred standard to which they aim to hold the Projects here makes little practical sense and exceeds any standard previously applied to projects under Act 30. It should not be adopted here.

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III. CONCLUSIONS AND PRAYER FOR RELIEF

WHEREFORE, the Michigan Energy Innovation Business Council, the Institute for Energy Innovation and Clean Grid Alliance continue to respectfully request that the Commission:

- (a) Find that the quantifiable and nonquantifiable public benefits of METC’s proposed transmission lines justify their construction;
- (b) Grant METC’s applications for certificates of public convenience and necessity for both Projects under review in this proceeding such that METC’s proposed construction schedules can be accommodated (see 5 Tr 475, 488); and
- (c) Reject Staff’s proposal to condition its approval on other states’ approvals of their respective segments of LRTP Tranche 1.

Respectfully submitted,

Potomac Law Group, PLLC
Attorneys for the Michigan Energy Innovation
Business Council, the Institute for Energy
Innovation and Clean Grid Alliance

April 9, 2025

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_____)

Case No. U-21471
(consolidated with U-21472)

PROOF OF SERVICE

STATE OF SOUTH CAROLINA)
) ss.
COUNTY OF BERKELEY)

Summer R. Dukes, the undersigned, being first duly sworn, deposes and says that she is a Paralegal at Potomac Law Group PLLC and that on the 9th day of April, 2025 she served the Reply Brief of the Michigan Energy Innovation Business Council, the Institute for Energy Innovation, and Clean Grid Alliance, via email, upon those individuals listed on the attached Service List via email.

Summer R. Dukes

<p><u>Administrative Law Judge</u> Honorable Christopher S. Saunders saundersc4@michigan.gov</p> <p><u>Ronald S. Bewersdorff, Trustee of the Ronald S. Bewersdorff Revocable Trust;</u> <u>Brenda Birchman; Daniel and Lori May;</u> <u>Kenneth May; Josip Zokvic, Trustee of the Josip Zokvic Trust</u> Clifford A. Knaggs Betsy L. Reeve Rhonda Kunkel caknaggs@kblawpc.com betsy@kblawpc.com rhonda@kblawpc.com</p> <p><u>Danielle Wohlscheid; Anthony Wohlschied;</u> <u>Diane Wohlscheid; Charles Wohlscheid; Valerie Wohlschied-Brennan; Robert Brennan; Lynn and Stephen Colby; Gordon and Vossie Diemer; Joseph and Jennifer Haddix; Karol and Eugene Sanborn; Dr. James and Dr. Judi Sikarskie; Lawrence and Coreen Strzalka</u> Frederick M. Baker, Jr. Valerie Wohlschied-Brennan Jim Dauphinais Brian Andrews Matthew Klekar fmbjrpllc@outlook.com vwohlscheid@hotmail.com jdauphinais@consultbai.com bandrews@consultbai.com mklekar@consultbai.com</p> <p><u>Michigan Electric Transmission Company, LLC</u> Courtney F. Kissel Olivia R.C.A. Flower Kyle M. Asher Hannah E. Buzolits Lisa Agrimonti Haley Waller Pitts Richard J. Aaron Breann Jurek ckissel@dykema.com oflower@dykema.com kasher@dykema.com hbuzolits@dykema.com lagrimonti@fredlaw.com hwallerpitts@fredlaw.com raaron@dykema.com kadarkwa@itctransco.com bjurek@fredlaw.com mpscfilings@dykema.com</p>	<p><u>Michigan Public Service Commission Staff</u> Amit T. Singh Michael J. Orris Monica M. Stephens Heather M.S. Durian Megan Mix Singha9@michigan.gov orrism@michigan.gov stephensm11@michigan.gov durianh@michigan.gov mixm@michigan.gov</p> <p><u>Michigan Energy Innovation Business Council Institute for Energy Innovation</u> <u>Clean Grid Alliance</u> Laura A. Chappelle Timothy J. Lundgren Justin K. Ooms Elizabeth Wheeler Laura Sherman Natalie Lyijynen lochappelle@potomaclaw.com tlundgren@potomaclaw.com jooms@potomaclaw.com ewheeler@cleangridalliance.org laura@mieibc.org natalie@mieibc.org</p> <p><u>Citizens Utility Board of Michigan (CUB) Sierra Club (SC)</u> Christopher M. Bzdok John Liskey Breanna Thomas Natasha Fowles Douglas B. Jester Julielyn Gibbons Eli K. Gold Laura A. Teichner chris@tropospherelegal.com john@liskeypllc.com breanna@tropospherelegal.com natasha@tropospherelegal.com djester@5lakesenergy.com jgibbons@5lakesenergy.com egold@5lakesenergy.com lauren@teichnerlaw.com</p>
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