



May 22, 2025

Ms. Lisa Felice
Michigan Public Service Commission
7109 W. Saginaw Hwy.
Lansing, MI 48909

Via E-File

RE: MPSC Case No. U-21859

Dear Ms. Felice:

Attached please find the enclosed documents for filing:

- Motion for Admission Pro Hac Vice of Jacob Elkin on behalf of Sierra Club;
- Affidavit in Support of Motion for Admission Pro Hac Vice;
- Certificate of Good Standing by the State Bar of New York;
- Receipt of Payment to the State Bar of Michigan;
- Notification; and
- Proof of Service.

Thank you for your assistance in this matter. If you have any questions, please feel free to contact me.

Sincerely,

Christopher M. Bzdok
chris@tropospherelegal.com

CC: Parties to Case No. U-21859

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

**MOTION FOR ADMISSION PRO HAC VICE
OF JACOB ELKIN AS CO-COUNSEL OF RECORD
ON BEHALF OF SIERRA CLUB**

Christopher M. Bzdok of the law firm Troposphere Legal, PLC is counsel of record in MPSC Case No. U-21859 for the Sierra Club and moves that Jacob Elkin be granted permission to participate in this case as co-counsel of record for Sierra Club. In support of this Motion, the movant states as follows:

1. Rule 419(2) of the rules of practice and procedure for the Michigan Public Service Commission (“MPSC” or “Commission”) states:

An attorney who is duly licensed to practice law in another state or in the courts of the United States may be permitted to practice before the Commission on the same basis as in the circuit courts in this State.

2. Rule 15, Section 2 of the rules concerning the State Bar of Michigan states:

Any person who is duly licensed to practice law in another state or territory, or in the District of Columbia, of the United States of America, or in any foreign country, may be temporarily admitted under MCR 8.126.

3. The movant is an active member in good standing of the State Bar of Michigan, and an attorney of record in this matter.

4. Jacob Elkin is an Attorney with Earthjustice, located at:

167 John F. Kennedy Blvd., Suite 2020
Philadelphia, PA 19103

5. Jacob Elkin is duly licensed and admitted to practice law in the state of New York and the Commonwealth of Pennsylvania; is a member in good standing with the State Bar of New York; and has paid the required fee to the State Bar of Michigan for temporary admission. (See attached Affidavit, Certificate of Good Standing from the Attorney Registration and Disciplinary Commission of New York, and letter from the State Bar of Michigan.)

6. The undersigned states the following:

- a. I have read the affidavit of Jacob Elkin and supporting documentation.
- b. I have made a reasonable inquiry concerning the averments made in the attached affidavit and believe the out-of-state attorney's representations to be true.
- c. I agree to ensure that the procedures of Michigan Court Rule 8.126 are followed.
- d. I agree to forward a copy of this Motion and the attachments to the Attorney Grievance Commission of the State of Michigan in compliance with Rule 8.126.

7. I respectfully request that Jacob Elkin be admitted as co-counsel of record for Sierra Club in Case Number U-21859.

TROPOSPHERE LEGAL, PLC
Counsel for Sierra Club

Date: April 29, 2025

By: _____

Christopher M. Bzdok (P53094)
420 E. Front St.
Traverse City, MI 49686
Phone: 231-709-4000

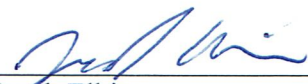
STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter on the application of)
CONSUMERS ENERGY COMPANY)
for Ex Parte Approval of Certain) Case No. U-21859
Amendments to Rate GPD)

AFFIDAVIT OF JACOB ELKIN

Jacob Elkin, being sworn, states as follows:

1. I am an attorney currently licensed to practice law and in good standing in the following jurisdictions: the State of New York and the Commonwealth of Pennsylvania. My Certificate of Good Standing in New York is attached as Attachment A.
2. I have previously been licensed to practice in no other jurisdiction.
3. I have sought a license to practice law in no other jurisdiction.
4. I am not disbarred or suspended in any jurisdiction.
5. I am not subject to any pending disciplinary action in any jurisdiction.
6. I have no disciplinary dispositions.
7. I am familiar with the Michigan Rules of Professional Conduct, Michigan Court Rules, and Michigan Rules of Evidence.
8. I have appeared or practiced in zero cases in Michigan within the past 365 days.




Jacob Elkin
Earthjustice
167 John F. Kennedy Blvd., Suite 2020
Philadelphia, PA 19103
(215) 671-6551
jelkin@earthjustice.org
Affiant

STATE OF PENNSYLVANIA)
PHILADELPHIA COUNTY)

Signed and sworn before me in Philadelphia County, Pennsylvania, by Jacob Elkin on
April [28], 2025.

Commonwealth of Pennsylvania - Notary Seal
PAUL F WILDE-HICKMAN - Notary Public
Philadelphia County
My Commission Expires October 31, 2027
Commission Number 1358388



Paul Wilde-Hickman, Notary Public
State of Pennsylvania,
County of Philadelphia
My commission expires [10/31/2027]
Acting in Philadelphia County

ATTACHMENT A



*Appellate Division of the Supreme Court
of the State of New York
First Judicial Department*

I, Susanna M. Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, do hereby certify that

Jacob Bryce Elkin

was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on December 5, 2022, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Office of Court Administration, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand in the City of New York on April 17, 2025.



Susanna M. Rojas

Clerk of the Court



Supreme Court of the State of New York
Appellate Division, First Department

DIANNE T. RENWICK
PRESIDING JUSTICE

SUSANNA MOLINA ROJAS
CLERK OF THE COURT

MARGARET SOWAH
DEPUTY CLERK OF THE COURT

DOUGLAS C. SULLIVAN
DEPUTY CLERK OF THE COURT

To Whom It May Concern

An attorney admitted to practice by this Court may request a certificate of good standing, which is the only official document this Court issues certifying to an attorney's admission and good standing.

An attorney's registration status, date of admission and disciplinary history may be viewed through the attorney search feature on [the website of the Unified Court System](#).

New York State does not register attorneys as active or inactive.

An attorney may request a disciplinary history letter from the [Attorney Grievance Committee of the First Judicial Department](#).

Bar examination history is available from the [New York State Board of Law Examiners](#).

Instructions, forms and links are available on [this Court's website](#).

Susanna Rojas
Clerk of the Court

Revised October 2020



State Bar of Michigan
 306 Townsend St
 Lansing, MI 48933
 (517) 346-6377

Pro Hac Vice Application Receipt

Jacob Elkin
 1617 JFK Blvd. Suite 2020
 Philadelphia, PA 19103
 United States
 jelkin@earthjustice.org

Your Pro Hac Vice application has been successfully submitted. Please note: This confirmation does NOT constitute your temporary admission to the State Bar of Michigan.

Only the court, administrative tribunal, or arbitrator may enter an order allowing temporary admission. Once the order is entered, it is the foreign attorney's responsibility to file a copy of the order of admission within **seven (7) days** of entry to ProHacVice@michbar.org (mailto:ProHacVice@michbar.org), as required by MCR 8.126.

Credit card: *****6766

Payment Date: 05/08/2025

	Amount
Credit Card Transaction Fee	\$3.88
CPF-Pro Hac Vice	\$15.00
Pro Hac Vice	\$140.00
Total	\$158.88

This payment may be reversed if your bank or financial institution rejects the payment. If payment is rejected by your bank due to insufficient funds, you will be assessed a \$25 fee.

If you require additional assistance, contact ProHacVice@michbar.org (mailto:ProHacVice@michbar.org).

May 16, 2025

Michigan Public Service Commission
7109 W. Saginaw Highway
Lansing, MI 48917

Re: *In the Matter of the Application of Consumers Energy Company for Ex Parte Approval of Certain Amendments to rate GPD*
Case No. U-21859

NOTIFICATION PURSUANT TO MCR 8.126(C)(2)

Please be advised that:

1. Jurisdiction(s) in which Jacob Elkin is currently licensed: New York, Pennsylvania.
2. The Pro Hac Vice application fee has been paid to the State Bar of Michigan or waived pursuant to MCR 8.126(B)(4).
3. Jacob Elkin has been temporarily admitted 0 time(s) within the past 365 days and is subject to the case limitation described in MCR 8.126(B)(2).

In accordance with MCR 8.126(C)(4), by copy of this notice, Jacob Elkin is reminded of the obligation to provide the State Bar of Michigan via email at prohacvice@michbar.org with a copy of the order granting or denying the Pro Hac Vice motion within **seven (7) days** of entry.

cc: Jacob Elkin, jelkin@earthjustice.org
Christopher M. Bzdok, chris@tropospherelegal.com

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.

Case No. U-21859

PROOF OF SERVICE

On the date below, an electronic copy of **Motion for Admission Pro Hac Vice of Jacob Elkin on behalf of Sierra Club, Affidavit in Support of Motion, Certificate of Good Standing, Receipt of Payment, and Notification** was served on the following:

Name/Party	E-mail Address
Counsel for Consumers Energy Company Anne M. Uitvlugt Kelly Hall Bret A. Totoraitis	Mpsc.filings@cmsenergy.com Anne.uitvlugt@cmsenergy.com Kelly.hall@cmsenergy.com Bret.totoraitis@cmsenergy.com
Counsel for MPSC Staff David W. Isakson Amit T. Singh Adam M. Cozort	isaksond@michigan.gov singha9@michigan.gov cozortal@michigan.gov
Attorney General Dana Nessel Lucas Wollenzien Michael E. Moody	ag-enra-spec-lit@michigan.gov wollenzienl@michigan.gov Mmoody2@michigan.gov
Consultants for Attorney General Dana Nessel Michael Deupree Taylor Deshotels Marcelo Gonzalez	michaeldeupree@acadianconsulting.com taylordeshotels@acadianconsulting.com marcelogonzalez@acadianconsulting.com
Counsel for Data Center Coalition Michael G. Oliva Nikhil Vijaykar Justin Bieber Kevin Higgins Lucas Fykes Travis Murray	moliva@fosterswift.com nvijaykar@keyesfox.com jbieber@energystrat.com khiggins@energystrat.com lucas@datacentercoalition.org tmurray@keyesfox.com

Association of Businesses Advocating Tariff Equity Stephen A. Campbell Michael J. Pattwell James Dauphinais Jessica York	scampbell@clarkhill.com mpattwell@clarkhill.com jdauphinais@consultbai.com jyork@consultbai.com
Counsel for The Ecology Center, The Environmental Law & Policy Center, Union of Concerned Scientists, and Vote Solar Daniel Abrams Alondra Estrada	mpscdocket@elpc.org dabrams@elpc.org aestrada@elpc.org
Counsel for Switch, LTD Valeria J.M. Brader	ecf@rivenoaklaw.com valerie@rivenoaklaw.com
Counsel for Michigan Energy Innovation Business Council, et al Justin K. Ooms Laura A. Chappelle Timothy J. Lundgren Summer R. Dukes	jooms@potomaclaw.com lchappelle@potomaclaw.com tlundgren@potomaclaw.com sdukes@potomaclaw.com

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

TROPOSPHERE LEGAL, PLC
Counsel for Sierra Club

Date: May 22, 2025

By: _____
Natasha Fowles, Legal Assistant
420 E. Front St.
Traverse City, MI 49686
Phone: 231-709-4900
Email: natasha@tropospherelegal.com