

June 25, 2025

Via E-Filing Only

Ms. Lisa Felice
Michigan Public Service Commission
7109 W. Saginaw Hwy.
P. O. Box 30221
Lansing, MI 48917

RE: MPSC Case No. U-21870

Dear Ms. Felice:

Please find the following documents enclosed for electronic filing in the above-referenced matter:

- Motion for Admission *Pro Hac Vice* of Jacob R. Schuhardt as Counsel of Record on Behalf of Urban Core Collective;
- Affidavit of Jacob R. Schuhardt in Support of Motion for Admission *Pro Hac Vice*;
- Supreme Court of Illinois Certificate of Admission to the Bar of Illinois, confirming his current good standing;
- *Pro Hac Vice* Application Receipt from the Michigan State Bar; and
- Proof of Service

Please do not hesitate to contact my office with any questions or comments.

Sincerely,

/s/Amanda Urban
Amanda Urban (P-80915)
aurbanlaw@gmail.com

xc: Parties to Case No. U-21870

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the Application of
CONSUMERS ENERGY COMPANY for
authority to increase its rates for generation
and distribution of electricity and for other
relief.

Case No. U-21870

ALJ Jonathan F. Thoits

**MOTION FOR ADMISSION *PRO HAC VICE*
OF JACOB R. SCHUHARDT AS CO-COUNSEL OF RECORD
ON BEHALF OF URBAN CORE COLLECTIVE**

Amanda Urban is counsel of record in MPSC Case No. U-21870 for Urban Core Collective and moves that Jacob R. Schuhardt be granted permission to participate in this case as co-counsel of record for Urban Core Collective. 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 of 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 R. Schuhardt is a Fellow of the Abrams Environmental Law Clinic, with his primary office at 6020 South University Avenue, Chicago, Illinois 60637. His email address is jschuhardt@uchicago.edu, and his phone number is 733-702-7198.

5. Jacob R. Schuhardt is duly licensed and admitted to practice law in the State of Illinois; and is a member in good standing with the Illinois Bar. Mr. Schuhardt has paid the required fee to the State Bar of Michigan for temporary admission. (See attached Affidavit, Certificate of Good Standing from the Illinois Bar and Pro Hac Vice Application Receipt from the Michigan State Bar.)

6. The undersigned states the following:

- a. I have read the affidavit of Jacob R. Schuhardt 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.

7. I respectfully request that Jacob R. Schuhardt be admitted as co-counsel of record for Urban Core Collective in Case Number U-21870.

Local Counsel for Urban Core Collective

Date: June 25, 2025

By: /s/ Amanda Urban
Amanda Urban (P-80915)
Attorney
(269) 254-0590
aurbanlaw@gmail.com

**AFFIDAVIT IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE***

Jacob R. Schuhardt, being sworn, states the following:

1. I am a Fellow of the Abrams Environmental Law Clinic at the University of Chicago, in Chicago, Illinois. I have taught and practiced in these capacities since 2023.

2. I am a 2019 graduate of Harvard Law School.

3. I have been licensed to practice law in the State of Illinois since 2019 and I am a member of good standing.

4. I have represented Urban Core Collective in cases U-21585 and U-21389 and Urban Core Collective, Soulardarity, and We Want Green, Too in case U-21291. I have also represented Soulardarity and We Want Green, Too before the Commission in cases U-21534 and U-21375. If granted leave to appear in this matter *pro hac vice*, I will be co-counseling with counsel who has participated in the following MPSC proceedings on behalf of Soulardarity, Urban Core Collective, and/or We Want Green, Too: U-21090, U-21224, U-18232, U-20733, U-20162, U-20561, U-20471, U-21015, U-20713, U-20851, U-21297, U-21172, and U-21193. I have represented and currently represent various other organizations in federal and state courts and regulatory proceedings.

5. I have not been disbarred, suspended, or denied admission in any jurisdiction.

6. I have not been denied *pro hac vice* status in Michigan, nor has such status been revoked in Michigan.

7. I am not the subject of any pending disciplinary action.

8. Attached are the following documents in support of my admission *pro hac vice* in Michigan:

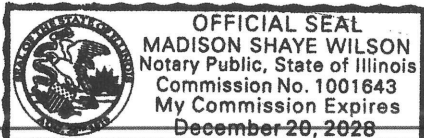
- a) Certificate of Admission to the Bar of Illinois from the Clerk of the Supreme Court of the State of Illinois, confirming that I am currently in good standing.
- b) State Bar of Michigan, acknowledging receipt of the required fee to seek temporary admission.

9. I am familiar with the Michigan Rules of Professional Conduct, Michigan Court Rules, and Michigan Rules of Evidence, and consent to the jurisdiction of the Michigan attorney disciplinary system.

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

Date: June 25, 2025

/s/ Jacob R. Schuhardt
Jacob R. Schuhardt

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| State of Illinois County of <u>Cook</u> | |
| Signed and sworn (or affirmed) to before me on <u>Jacob R. Schuhardt</u> (name of person making statement). | <u>June 25, 2025</u> (date) by |
| (seal) <u>M. W.</u> signature of notary public |  |

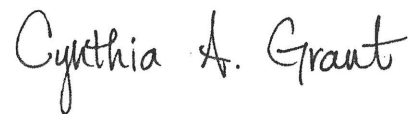
Certificate of Admission To the Bar of Illinois

I, Cynthia A. Grant, Clerk of the Supreme Court of Illinois, do hereby certify that

Jacob Russell Schuhardt

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 05/07/2020 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto
subscribed my name and affixed the
seal of said Court, this 16th day of
June, 2025.



Clerk,
Supreme Court of the State of Illinois



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

Pro Hac Vice Application Receipt

Jacob Schuhardt
600 N Dearborn St Apt 806
Chicago, IL 60654-6287
United States
jschuhardt@uchicago.edu

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: *****0139

Payment Date: 06/25/2025

| | 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).

STATE OF MICHIGAN
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CONSUMERS ENERGY COMPANY for
authority to increase its rates for generation
and distribution of electricity and for other
relief.

U-21870

ALJ Jonathan F. Thoits

PROOF OF SERVICE

I, Amanda Urban, certify that an electronic copy of **Motion for Admission *Pro Hac Vice* of Jacob R. Schuhardt as Counsel of Record on Behalf of Urban Core Collective** was served on the following on June 25, 2025.

| Name/Party | E-mail Address |
|---|--|
| Administrative Law Judge Jonathan F. Thoits | thoitsj@michigan.gov |
| Consumers Energy Company Gary A. Gensch Jr. Anne M. Uitvlugt Evan B. Keimach Mark R. Ruskiewicz Spencer A. Sattler Bret A. Totoraitis | gary.genschjr@cmsenergy.com anne.uitvlugt@cmsenergy.com evan.keimach@cmsenergy.com mark.ruskiewicz@cmsenergy.com spencer.sattler@cmsenergy.com bret.totoraitis@cmsenergy.com kelly.hall@cmsenergy.com mpsc.filings@cmsenergy.com |
| Michigan Attorney General Celeste R. Gill Lucas Wollenzien | Gillc1@michigan.gov WollenzienL@michigan.gov ag-enra-spec-lit@michigan.gov |
| Michigan Public Service Commission Staff Daniel E. Sonneveldt Amit T. Singh Nicholas Q. Taylor Alena M. Clark Adam M. Cozort Michael J. Orris Lori Mayabb | sonneveldtd@michigan.gov singha9@michigan.gov taylorn10@michigan.gov clarka55@michigan.gov cozort1@michigan.gov orrism@michigan.gov mayabbl@michigan.gov |
| Citizens Utility Board of Michigan, Michigan Environmental Council, Sierra Club Christopher M. Bzdok Holly L. Hillyer Tracy Jane (TJ) Andrews | chris@tropospherelegal.com holly@tropospherelegal.com tjandrews@tropospherelegal.com |

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|--|--|
| Natasha Fowles John Liskey | natasha@tropospherelegal.com john@liskeypllc.com |
| Great Lakes Renewable Energy Association (GLREA) Don L. Keskey | donkeskey@publiclawresourcecenter.com |
| Walmart, Inc. Melissa M. Horne | mhorne@hcc-law.com |
| Heston Hemlock Semiconductor Operations, LLC and Solar Technology LLC Jennifer U. Heston | jheston@fraserlawfirm.com |
| The Ecology Center, The Environmental Law & Policy Center, Union of Concerned Scientists, and Vote Solar Daniel H.B. Abrams Katie Duckwoth Alondra Estrada Katie Toolan | dabrams@elpc.org kduckworth@elpc.org astrada@elpc.org MPSCDocket@elpc.org ktoolan@elpc.org |
| Urban Core Collective Amanda Urban Mark Templeton Jacob Schuhardt Madison S. Wilson | aurbanlaw@gmail.com templeton@uchicago.edu jschuhardt@uchicago.edu madisonswilson@uchicago.edu aelc_mpsc@lawclinic.uchicago.edu |

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

Local Counsel for Urban Core Collective

Date: June 25, 2025

By: /s/ Amanda Urban
Amanda Urban (P-80915)
Attorney
(269) 254-0590
aurbanlaw@gmail.com