

June 25, 2025

*Via E-Filing*

Ms. Lisa Felice  
Executive Secretary  
Michigan Public Service Commission  
7109 West Saginaw Highway  
Lansing, MI 48917

RE: MPSC Case No. U-21870

Dear Ms. Felice:

The following is attached for paperless electronic filing:

- Petition to Intervene by Urban Core Collective;
- Appearance of Amanda Urban on behalf of Urban Core Collective; and
- Proof of Service.

Sincerely,

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

xc: Parties to Case No. U-21870  
Mark Templeton – University of Chicago

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.

U-21870

ALJ Jonathan F. Thoits

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**PETITION TO INTERVENE BY URBAN CORE COLLECTIVE**

1. Urban Core Collective (“UCC”), a Grand Rapids, Michigan-based nonprofit organization, whose member organizations are composed of clients, constituents, students, and residents (“clients and constituents”) who are customers of Consumers Energy Company (“Consumers”), seeks to intervene in this case to represent the interests of its member organizations’ clients and constituents in receiving electricity that is generated and delivered through cost-effective, prudent and environmentally sound practices.

2. On June 2, 2025, Consumers Energy Company filed its Application in this case pursuant to various provisions of 1909 PA 106, as amended, MCL 460.551 *et seq.*, 1919 PA 419, as amended, MCL 460.54 *et seq.*, and 1939 PA 3, as amended, MCL 460.1, *et seq.* The Company makes a number of requests for relief in its Application, including, but not limited to, authorization to adjust its retail electric rates to provide approximately \$436 million worth of additional annual revenue, provide a rate of return on common equity of not less than 10.25%, implement various pilots, and adopt certain accounting practices related to the regulatory treatment of certain assets or liabilities.

3. UCC is a community justice organization focused on uplifting historically marginalized communities to a place of greater self-sufficiency through unity in order to reduce the effects of systemic racism.

4. UCC, its member organizations, and their clients and constituents use electricity and pay electricity bills in Consumers' service territory. The rates, terms and conditions, and policies governing the provision of electricity by Consumers to them directly affect them.

5. UCC, its member organizations, and their clients and constituents have a strong interest in having their electricity needs met in a manner that is dependable, environmentally responsible, economically feasible, and provided at costs that are relatively stable over the long term and allocated fairly among customer classes.

6. UCC, its member organizations, and their clients and constituents have the potential to be harmed if they were required to incur higher costs of electricity.

7. The clients and constituents of UCC's member organizations have the potential to continue to bear disproportionate environmental and public health burdens caused by imprudent or unreasonable utility practices.

8. The Michigan Public Service Commission ("MPSC") recognizes two types of intervention:

- a. The first type is intervention by right, which requires that the party will suffer an injury-in-fact as a result of the outcome of the case, and that the party is within the zone of interests protected by the statute. *See, e.g., Association of Data Processing Service Organizations, Inc. v. Camp*, 397 U.S. 150; 90 S. Ct. 827; 25 L.Ed.2d 184 (1970).

b. The second type of intervention is permissive; the Commission has the discretion to permit a party to intervene in the case where that party can provide useful information to the Commission or a unique perspective on the issues in the case.

9. UCC qualifies for intervention under both standards and will provide useful information to the Commission and a unique perspective on the issues.

10. UCC meets the standard to intervene by right. UCC is an electric customer of Consumers. UCC's member organizations' clients and constituents include electric customers of Consumers. UCC, its member organizations, and their clients and constituents could suffer injury in-fact as a result of the outcome of the case. UCC, its member organizations, and their clients and constituents are directly impacted by Consumer's provision of electricity and billing practices and will suffer adverse financial consequences from Commission approval of any imprudent or unreasonable requests made by Consumers in this proceeding.

11. UCC, its member organizations, and their clients and constituents are within the zone of interest protected by MCL 460.1, *et seq.* These statutes generally protect ratepayers and provide opportunities for advocacy by ratepayer groups to protect their interests in Commission proceedings. UCC intervened in Consumer Energy's recent Integrated Resource Plan case, U21090, Consumers Energy's recent rate cases, U-21224, U-21389, and U-21585, as well as DTE Gas Company's recent rate case, U-21291. Further, UCC advocates for community-level self-sufficiency and affordability of basic services, including with regard to energy, and therefore has a direct interest in, and will feel the direct impact of, the relief requested by Consumers in this proceeding.

12. UCC also meets the standard for permissive intervention in this proceeding. As an amplifier of community voices for social justice and economic growth, including with regard to energy, UCC will provide a unique perspective on the issues in this case. UCC has been directly engaging with constituents, which comprise low-income, people of color, to educate them about Consumers' recently completed IRP and rate-making proceedings and to hear about their experience as Consumers ratepayers. UCC will bring this expertise to bear in this proceeding. The usefulness of the information and perspectives UCC brings through its participation in Commission proceedings is evidenced by its intervention in Consumer Energy's recent Integrated Resource Plan case U-21090 and the rate case U-21224. In the Integrated Resource Plan case U21090, UCC participated in the negotiation of the proposed settlement agreement in that matter, in particular as to the agreement's provisions related specifically to environmental justice, community engagement, and the creation of a fund to help low-income customers—all of particular interest to and advocated for by UCC.

13. This petition to intervene is timely and within the period for intervention set in the notice of prehearing.

14. No other party adequately represents the interests of UCC and its clients and constituents.

15. UCC plans to advocate for reasonable and prudent rates, policies, and programs based on the particular economic, health, and other effects Consumers' proposal will have on low income and people of color communities, and will otherwise evaluate Consumers' application, testimony, and exhibits; conduct discovery; and then raise those issues and take those positions that best serve the interests of UCC and its clients and constituents, as described above. UCC reserves the right to advance other issues as the case develops.

16. If allowed to intervene, UCC requests that all notices and pleadings be served on the following:

Amanda Urban (P80915)  
Attorney  
University of Chicago Law School – Abrams Environmental Law Clinic  
6020 South University Avenue  
Chicago, IL 60637  
(773) 702-9611  
aurbanlaw@gmail.com

Mark Templeton  
Lead Counsel for Urban Core Collective  
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For all of these reasons, Urban Core Collective respectfully requests that the Commission grant this petition to intervene and treat Urban Core Collective as a party to this proceeding.

Abrams Environmental Law Clinic  
Local Counsel for Urban Core Collective

Date: June 25, 2025

By: /s/ Amanda Urban  
Amanda Urban (P-80915)  
Attorney  
(269) 254-0590  
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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: Consumers Electric Company Docket No. U-21870

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

1. Urban Core Collective
2. (Name)
3. (Name)
4. (Name)
5. (Name)
6. (Name)
7. (Name)

Name: Amanda Urban

Address: 6020 South University Avenue

City: Chicago State: IL

Zip: 60637 Phone (269) 254-0590

Email: aurbanlaw@gmail.com

Date: June 20, 2024

Signature: /s/ Amanda Urban

I am not an attorney

I am an attorney whose:

Michigan Bar # is P-80915

\_\_\_\_\_ Bar # is: \_\_\_\_\_  
( state )

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EAHR1 - 09/29/2016

STATE OF MICHIGAN

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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.

U-21870

ALJ Jonathan F. Thoits

**PROOF OF SERVICE**

On the date below, an electronic copy of **Petition to Intervene by Urban Core Collective** and **Appearance of Amanda Urban on behalf of Urban Core Collective** was served on the following:

Name/Party	E-mail Address
<b>Administrative Law Judge</b> Jonathan F. Thoits	<a href="mailto:thoitsj@michigan.gov">thoitsj@michigan.gov</a>
<b>Consumers Energy Company</b> Gary A. Gensch Jr. Anne M. Uitvlugt Evan B. Keimach Mark R. Ruszkiewicz Spencer A. Sattler Bret A. Totoraitis	<a href="mailto:gary.genschjr@cmsenergy.com">gary.genschjr@cmsenergy.com</a> <a href="mailto:anne.uitvlugt@cmsenergy.com">anne.uitvlugt@cmsenergy.com</a> <a href="mailto:evan.keimach@cmsenergy.com">evan.keimach@cmsenergy.com</a> <a href="mailto:mark.ruszkiewicz@cmsenergy.com">mark.ruszkiewicz@cmsenergy.com</a> <a href="mailto:spencer.sattler@cmsenergy.com">spencer.sattler@cmsenergy.com</a> <a href="mailto:bret.totoraitis@cmsenergy.com">bret.totoraitis@cmsenergy.com</a> <a href="mailto:kelly.hall@cmsenergy.com">kelly.hall@cmsenergy.com</a> <a href="mailto:mpsc.filings@cmsenergy.com">mpsc.filings@cmsenergy.com</a>
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<b>Citizens Utility Board of Michigan,            Michigan Environmental Council, and            Sierra Club</b> Christopher M. Bzdok Holly L. Hillyer Tracy Jane (TJ) Andrews	<a href="mailto:chris@tropospherelegal.com">chris@tropospherelegal.com</a> <a href="mailto:holly@tropospherelegal.com">holly@tropospherelegal.com</a> <a href="mailto:tjandrews@tropospherelegal.com">tjandrews@tropospherelegal.com</a>

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<b>The Ecology Center, The Environmental Law &amp; Policy Center, Union of Concerned Scientists, and Vote Solar</b> Daniel H.B. Abrams Katie Duckwoth Alondra Estrada Katie Toolan	<a href="mailto:dabrams@elpc.org">dabrams@elpc.org</a> <a href="mailto:kduckworth@elpc.org">kduckworth@elpc.org</a> <a href="mailto:aestrada@elpc.org">aestrada@elpc.org</a> <a href="mailto:MPSCDocket@elpc.org">MPSCDocket@elpc.org</a> <a href="mailto:ktoolan@elpc.org">ktoolan@elpc.org</a>
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The statements above are true to the best of my knowledge, information, and belief.

Abrams Environmental Law Clinic  
Local Counsel for Urban Core Collective

Date: June 25, 2025

By: /s/ Amanda Urban  
Amanda Urban (P-80915)  
Attorney  
(269) 254-0590  
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