



October 13, 2025

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

Via E-File

RE: MPSC Case No. U-21870

Dear Ms. Felice:

Attached please find the enclosed documents for filing:

- Motion for Leave to Respond to Staff's Application for Leave and Brief in Support by Michigan Environmental Council, Natural Resources Defense Council, Sierra Club, and Citizens Utility Board of Michigan;
- Exhibit A: Response in Opposition by MNSC, Exhibit B: Affidavit, and Exhibit C: September 18, 2025, Service Email; and
- Proof of Service.

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

Sincerely,

Holly L. Hillyer
holly@tropospherelegal.com

CC: 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 the generation
and distribution of electricity and for other
relief.

Case No. U-21870

ORAL ARGUMENT WAIVED

**MOTION FOR LEAVE TO RESPOND TO STAFF'S APPLICATION FOR LEAVE
AND BRIEF IN SUPPORT**

**BY MICHIGAN ENVIRONMENTAL COUNCIL,
NATURAL RESOURCES DEFENSE COUNCIL, SIERRA CLUB, AND
CITIZENS UTILITY BOARD OF MICHIGAN**

October 13, 2025

Table of Contents

I. MOTION..... 1

II. BRIEF IN SUPPORT 1

III. CONCLUSION..... 2

I. MOTION

Interveners Michigan Environmental Council (MEC), Natural Resources Defense Council (NRDC), Sierra Club (SC), and Citizens Utility Board of Michigan (CUB) (collectively, MNSC) respectfully move for leave to file the attached proposed *Response in Opposition to the Michigan Public Service Commission Staff's Application for Leave to Appeal the Denial of Staff's Motion to Amend the July 8, 2025, Scheduling Memorandum (Exhibit A)*. While the deadline to respond to the application for leave was technically October 2, MNSC was not served with a copy of Staff's application for leave and did not discover it until it was served with the Company's response on October 2. MNSC thus seeks leave of the Commission to respond to the application for leave at this time. MNSC waives oral argument on this motion.

II. BRIEF IN SUPPORT

On September 18, 2025, Staff filed an application for leave to appeal a ruling issued on September 4, 2025, by the Administrative Law Judge (ALJ). As explained in the attached affidavit of Holly Hillyer (**Exhibit B**), notwithstanding Staff's Proof of Service indicating the application for leave to appeal was served on counsel for MEC¹, undersigned counsel were unable to locate any email from Staff serving the application. Attached is a copy of the email serving counsel for some parties in this proceeding with the application for leave to appeal (**Exhibit C**). While the email was sent to Jackson Neme, former intern to MNSC's counsel in this proceeding, Mr. Neme's internship ended in August and his email is not active nor monitored. No attorneys or representatives for MNSC were included in the email or otherwise served with the application for leave. Counsel for MNSC first became aware that Staff had filed an application for leave to appeal

¹ The Proof of Service does not include NRDC, SC, or CUB.

on October 2, 2025, when it was served with the Company's response in support of the application.

(Exhibit B)

Under Rule 432, the Michigan Administrative Code authorizes a party to make a request to the Commission for a ruling by written motion.² The Commission is thus authorized to consider MNSC's motion for leave to file a response to Staff's application for leave to appeal. Under Rule 433, any response to an application for leave to appeal a ruling of the presiding officer must be filed within 14 days after service of the application.³ MNSC was not actually served with the application, so MNSC's proposed response (**Exhibit A**) is not untimely. Alternatively, because MNSC did not discover the application for leave to appeal until October 2, MNSC's proposed response is not untimely. Alternatively, if MNSC's response is untimely, then the Commission should grant this motion otherwise MNSC will be denied any opportunity to respond to Staff's application for leave to appeal. As such, there is good cause to grant this motion for leave for MNSC to file a response to Staff's application for leave.

III. CONCLUSION

For the reasons above, MNSC respectfully requests the Commission grant the opportunity to file the attached proposed Response (**Exhibit A**) for the Commission's consideration in resolving Staff's application for leave. MNSC waives oral argument.⁴

² Mich Admin R 792.10432(1).

³ Mich Admin R 792.10433(1).

⁴ Mich Admin R 792.10432(4).

Respectfully submitted,

TROPOSPHERE LEGAL, PLC
Counsel for MNSC

Date: October 13, 2025

By: _____

Holly L. Hillyer (P85318)
Christopher M. Bzdok (P53094)
Tracy Jane Andrews (P67467)
420 E. Front St.
Traverse City, MI 49686
Phone: 231-709-4000

EXHIBITS

- Exhibit A** *Response in Opposition to the Michigan Public Service Commission Staff's Application for Leave to Appeal the Denial of Staff's Motion to Amend the July 8, 2025, Scheduling Memorandum*
- Exhibit B** Affidavit of Holly Hillyer
- Exhibit C** September 18, 2025, Service Email

Exhibit A

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of
CONSUMERS ENERGY COMPANY for Case No. U-21870
authority to increase its rates for the generation
and distribution of electricity and for other
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**RESPONSE IN OPPOSITION TO MICHIGAN PUBLIC SERVICE COMMISSION
STAFF'S APPLICATION FOR LEAVE TO APPEAL THE DENIAL OF STAFF'S
MOTION TO AMEND THE JULY 8, 2025, SCHEDULING MEMORANDUM**

**BY MICHIGAN ENVIRONMENTAL COUNCIL,
NATURAL RESOURCES DEFENSE COUNCIL, SIERRA CLUB, AND
CITIZENS UTILITY BOARD OF MICHIGAN**

October 13, 2025

Interveners Michigan Environmental Counsel (MEC), Natural Resources Defense Council (NRDC), Sierra Club (SC), and Citizens Utility Board of Michigan (CUB) (collectively, MNSC) respectfully request that the Commission deny the Staff of the Michigan Public Service Commission's (Staff) application for leave to appeal a ruling of the Administrative Law Judge (ALJ) because the application for leave fails to state a proper basis for interlocutory appeal under the administrative rules of the Michigan Public Service Commission (MPSC or Commission).

I. BACKGROUND

On July 8, 2025, the ALJ issued a scheduling memorandum directing any party that submits testimony that addresses Return on Equity (ROE) to “submit direct or rebuttal testimony and any supporting exhibits which set forth a) the average expected long-term return on equity for the broader stock market, and b) the average ROE authorized for regulated utilities in the United States for the last five years.”¹

Staff filed a *Motion to Amend the July 8 Scheduling Memorandum* on August 20 seeking “removal of the requirement for parties to produce substantive evidence.”² The Attorney General responded in support, acknowledging the ALJ's authority and discretion to manage his dockets, but noting concerns “with the workability” of the substantive requirements.³

The ALJ denied Staff's motion on September 4 but amended the scheduling memorandum to narrow the scope of information requested and to excuse non-compliance if parties are “unable

¹ Case No. U-21870, Scheduling Memorandum, July 8, 2025.

² Case No. U-21870, Staff's Motion, August 20, 2025.

³ Case No. U-21860, Attorney General's Response in Support of Staff's Motion, August 22, 2025.

to locate the requested information” and state that they “in good faith attempted to locate the requested information in public resources or resources available to [them].”⁴

Staff filed an application for leave to appeal the ALJ’s ruling on September 18. Consumers Energy filed a response in support of Staff’s application for leave to appeal.⁵

The Commission should deny Staff’s *Application for Leave to Appeal the Denial of Staff’s Motion to Amend the July 8, 2025, Scheduling Memorandum* because it has not stated a proper basis for interlocutory appeal.

II. ARGUMENT

The Michigan Administrative Code states that the MPSC “shall grant an application [for leave to appeal]” a ruling of a presiding officer if immediate review of the ruling will (a) “materially advance a timely resolution of the proceeding,” or (b) “prevent substantial harm to the appellant or the public-at-large.”⁶

Staff brings their application for interlocutory appeal under Mich Admin R 792.10433(2)(b) and alleges that they will suffer substantial harm if immediate review is not granted of the ALJ’s September 4 ruling.⁷ Staff’s application is not supported by specific factual allegations that support the conclusion that it or the public is likely to suffer substantial harm from

⁴ Case No. U-21870, Ruling, September 4, 2025 (providing that parties may comply by “include[ing] a statement that the witness has in good faith attempted to locate the requested information in public resources or resources available to the party”).

⁵ Case No. U-21870, Consumers Energy Company’s Response in Support of Staff’s Application for Leave, October 2, 2025.

⁶ Mich Admin R 792.10433(2)(a), (b). The third basis supporting an application for leave to appeal a ruling to the appears inapplicable here. *Id.* ((c) “A decision on the ruling before submission of the full case to the commission for final decision is consistent with other criteria that the commission may establish by order.”).

⁷ Case No. U-21870, Staff’s Appeal, September 18, 2025, pp 3-4.

the ALJ's ruling, as is required under Mich Admin R 792.10433(4). Staff argues the ruling creates "significant negative precedence [sic]" and forces a party to provide evidence that may be used against it. Neither assertion is substantiated or compelling, and neither supports the necessity of interlocutory relief.

The ALJ's September 4 ruling is non-precedential – Staff and others may challenge it through the regular briefing and exceptions process leading to a final Commission order. If the Commission in its final order finds the ALJ erred in its ruling and subsequent amendment of the scheduling memorandum, there is no precedent. If the Commission finds no error, then it is the Commission's order that establishes precedent, not the ALJ's ruling or the scheduling memorandum.

Under the ALJ's amended scheduling memorandum, a witness is exempt from the ALJ's instruction to produce the requested information if, in good faith, they attempt to locate the requested information in public resources or resources available to them but are unable to do so.⁸ Staff did not establish that it would be harmed by either providing the information, as the Attorney General did,⁹ or by failing to provide the requested information, which is the approach CUB followed.¹⁰ As the ALJ noted in his ruling, "[t]he Memo does not state any potential ramifications if the requested evidence is not provided."¹¹ By its terms, the scheduling memorandum does not force a party to supply evidence nor take a position on the requested information.

Staff does not explain how providing information requested by an ALJ may be used prejudicially against that party in the future, but even if that were the case, that potential harm may

⁸ Case No. U-21870, Scheduling Memo, September 5, 2025.

⁹ See Direct Testimony of Sebastian Coppola, pp 157-60.

¹⁰ See Direct Testimony of Matthew Bandyk, p 4.

¹¹ Case No. U-21870, Ruling, September 4, 2025, p 7.

be addressed and rectified through the regular appellate process. Testimony was filed September 30; any harm incurred locating the information passed; any harm arising from providing or not providing the requested information is presently hypothetical and will arise (if at all) later in the proceeding such that it may be addressed in the Commission’s final order. As such, Staff has not identified any harm that justifies interlocutory relief.

Even if Staff were immediately harmed by the ruling (which MNSC disputes), the harm alleged is likely not “substantial,” as is required under Mich Admin R 792.10433(2)(b). The Commission, for example, has previously granted appeals under Mich Admin R 792.10433(2)(b) for denied applications to intervene and motions for summary disposition.¹² Staff’s interlocutory appeal is not like those scenarios, where but-for appeal, the adverse ruling would have immediate, substantial prejudicial effect on the party. If the ALJ were to penalize Staff in some unidentified way for failing to produce the requested information, Staff has recourse to obtain redress through the regular process. Alternatively, the Commission may disregard or give little weight to the information the ALJ requested.¹³ As indicated in the ALJ’s ruling, parties may explicitly challenge the relevance or weight of the requested evidence “by way of testimony, exhibit(s), and/or a brief,” and parties (or their witnesses) will not be considered sponsors of the requested testimony.¹⁴

Granting Staff’s application for leave to appeal is also not likely to “materially advance a timely resolution of the proceeding” in this case.¹⁵ Rather, it does the opposite. As discussed in the ALJ’s ruling, “the determination of a reasonable ROE authorized by the Commission for Consumers is a fundamental issue in this case, and the requested information is directly related to

¹² See e.g., Case No. U-18010, Order, October 7, 2019; also Case No. U-20359, Order, September 26, 2019.

¹³ See Case No. U-21870, Ruling, September 4, 2025, p 5.

¹⁴ *Id.*

¹⁵ See Mich Admin R 792.10433(2)(a).

the resolution of that issue.”¹⁶ The role of the ALJ is, among other things, to make findings of fact on the ROE issue in this case. Yet, if Staff’s appeal is granted and an order rendered in its favor, the effect will be to eliminate relevant information from evidence that the ALJ may otherwise consider to advance the timely resolution of this case.

In issuing the amended scheduling memorandum, the ALJ identified the sources of its authority and the legal basis for requesting the information and confirmed that the requested information is directly relevant to determining a reasonable ROE.¹⁷ The Commission undoubtedly recognizes that establishing the ROE is typically highly contested, addressing multiple methodologies and variations on them; the record on this issue often spans hundreds of pages of testimony, exhibits, and decision-making.¹⁸ The ALJ’s request for specific information ensures some reasonable benchmarks are included in the record and provides a modicum of guidance to the parties, which MNSC welcomes. The Commission may address any error in the ALJ’s ruling in the final order on the merits of this proceeding. Staff established no basis for interlocutory relief.

III. REQUEST FOR RELIEF

For the reasons above, MNSC respectfully requests the Commission deny Staff’s *Application for Leave to Appeal the Denial of Staff’s Motion to Amend the July 8, 2025, Scheduling Memorandum*, and instead address any challenge or error that may in the future arise from the

¹⁶ See Case No. U-21870, Ruling, September 4, 2025, p 3.

¹⁷ Ruling on Motion to Amend the July 8, 2025, Scheduling Memorandum, September 4, 2025, pp 2-7.

¹⁸ By way of example, in Case No. U-21585, six parties (Consumers Energy, Staff, Attorney General, ABATE, CUB, Walmart) submitted testimony on ROE; the Proposal for Decision spanned 62 pages, and the section of the final order addressing ROE covered 18 pages. PFD, January 27, 2025, pp 319-81; Final Order, March 21, 2025, pp 236-54.

amended scheduling memorandum and ruling when the Commission considers the merits of this case.

Respectfully submitted,

TROPOSPHERE LEGAL, PLC
Counsel for MNSC

Date: October 13, 2025

By:

Holly L. Hillyer (P85318)
Christopher M. Bzdok (P53094)
Tracy Jane Andrews (P67467)
420 E. Front St.
Traverse City, MI 49686
Phone: 231-709-4000

Exhibit B

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 the generation
and distribution of electricity and for other
relief.

Case No. U-21870

AFFIDAVIT IN SUPPORT OF MOTION FOR LEAVE TO FILE RESPONSE

Holly L Hillyer, being sworn, states the following:

1. I am counsel of record for Michigan Environmental Council (MEC), Natural Resources Defense Council (NRDC), Sierra Club, and Citizens Utility Board of Michigan (CUB) (collectively, MNSC) in Case No. U-21870, along with my colleagues at Troposphere Legal, Tracy Jane Andrews and Christopher Bzdok.
2. On October 2, 2025, Consumers Energy served me with its *Response in Support of Michigan Public Service Commission Staff's Application for Leave to Appeal the Denial of Staff's Motion to Amend the July 8, 2025 Scheduling Memorandum* (Response in Support), which it filed that same day.
3. Until I received Consumers Energy's Response in Support, I had been unaware that Staff had filed an Application for Leave to Appeal.
4. Upon receipt of Consumers Energy's Response in Support, I obtained a copy of Staff's Application for Leave to Appeal and its attached Proof of Service from the MPSC e-dockets website.
5. The Proof of Service says that, on September 18, 2025, Staff served a copy of its Application for Leave on me, Ms. Andrews, and Mr. Bzdok, on behalf of MEC, via email only at our respective email addresses: holly@tropospherelegal.com, tjandrews@tropospherelegal.com, and chris@tropospherelegal.com.
6. I do not recall receiving service via email on September 18, 2025, and could locate no such email in my inbox.
7. I asked Ms. Andrews and Mr. Bzdok if they had received an email serving the Application for Leave and they indicated that they did not recall receiving such an email nor could they locate a copy, but Ms. Andrews obtained a copy from another party on October 3 and forwarded it to me.


8. I reviewed the forwarded service email, which does not include holly@tropospherelegal.com, tjandrews@tropospherelegal.com, or chris@tropospherelegal.com in the "To" field.
9. The only email address in the "To" field for anyone associated with Troposphere Legal is jackson@tropospherelegal.com, which belonged to a summer associate who is no longer with Troposphere Legal, and which generates an automatic reply notifying senders that the account no longer being monitored.

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

TROPOSPHERE LEGAL, PLC
Counsel for MNSC

Date: October 13, 2025

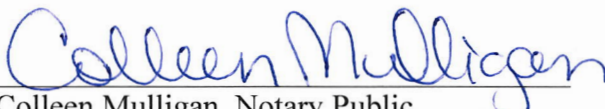
By:



Holly L. Hillyer (P85318)
420 E. Front St.
Traverse City, MI 49686
Phone: 231-709-4000

STATE OF MICHIGAN
GRAND TRAVERSE COUNTY

Signed and sworn before me in Grand Traverse County, Michigan, by Holly L. Hillyer on October 13, 2025.



Colleen Mulligan, Notary Public
State of Michigan, County of Grand Traverse
My commission expires June 9, 2027
Acting in Grand Traverse County

Exhibit C

From: [REDACTED]
To: [TJ Andrews](#)
Subject: FW: Case No. U-21870
Date: Friday, October 3, 2025 2:14:44 PM
Attachments: [21870 p App for Lv to Appeal Denial of Motion.pdf](#)

From: Shea, Cherie (AG) <SheaC1@michigan.gov>
Sent: Thursday, September 18, 2025 3:09 PM
To: Aaron, Richard <raaron@dykema.com>; AG-ENRA-Spec-Lit <AG-ENRA-Spec-Lit@michigan.gov>; Alexandria Miskho <amiskho@uchicago.edu>; Alondra Estrada <aestrada@elpc.org>; Amanda Urban (t-9aurba@lawclinic.uchicago.edu) <t-9aurba@lawclinic.uchicago.edu>; Anne M. Uitvlugt <anne.uitvlugt@cmsenergy.com>; Burt, Jordan <jordan.burt@aeclinic.org>; Campbell, Stephen A. <scampbell@clarkhill.com>; Carol Dane <adminasst@publiclawresourcecenter.com>; CECo (mpsc.filings@cmsenergy.com) <mpsc.filings@cmsenergy.com>; Chappelle, Laura A. <lachappelle@varnumlaw.com>; Christina Hildebrandt <childebrandt@consultbai.com>; Clark, Alena (AG) <ClarkA55@michigan.gov>; Courtney Kissel <ckissel@dykema.com>; Cozort, Adam (AG) <CozortA1@michigan.gov>; dabrams@elpc.org; DTE (mpscfilings@dteenergy.com) <mpscfilings@dteenergy.com>; Dykema (MPSCFilings@dykema.com) <MPSCFilings@dykema.com>; ELPC <MPSCDocket@elpc.org>; Emma Young <eyoung28@uchicago.edu>; Evan B. Keimach (evan.keimach@cmsenergy.com) <evan.keimach@cmsenergy.com>; Gary A. Gensch Jr <gary.genschjr@cmsenergy.com>; Gill, Celeste (AG) <GillC1@michigan.gov>; Hannah Buzolits <hbuzolits@dykema.com>; J Schuhardt <jschuhardt@uchicago.edu>; James R. Dauphinais (jdauphinais@consultbai.com) <jdauphinais@consultbai.com>; Jennifer Utter Heston (jheston@potomaclaw.com) <jheston@potomaclaw.com>; Jessica York <jyork@consultbai.com>; Jon Austin <jaustin@fraserlawfirm.com>; Justin Bieber <jbieber@energystrat.com>; Katie Duckworth <kduckworth@elpc.org>; Katie Toolan <ktoolan@elpc.org>; Kelly Hall (kelly.hall@cmsenergy.com) <kelly.hall@cmsenergy.com>; Keskey, Don L. (donkeskey@publiclawresourcecenter.com) <donkeskey@publiclawresourcecenter.com>; Kurt Boehm <kboehm@bkllawfirm.com>; Kyler, Jody <JKylerCohn@BKLLawfirm.com>; Lauren Degnan <ldegan@clarkhill.com>; Lundgren, Timothy J. <tjlundgren@varnumlaw.com>; Lydia Lubbers <lmubbers@varnumlaw.com>; Mark Ruszkiewicz <mark.ruszkiewicz@cmsenergy.com>; Mark Templeton <templeton@uchicago.edu>; Mayabb, Lori (LARA) <MayabbL@michigan.gov>; Melissa Horne <mhorne@hcc-law.com>; Michael Kurtz <mkurtz@BKLLawfirm.com>; Neme, Jackson <jackson@tropospherelegal.com>; Olivia Flower <oflower@dykema.com>; Ooms, Justin K. <jkooms@varnumlaw.com>; Orris, Michael (AG) <OrrisM@michigan.gov>; Sean Gallagher (sgallagher@fraserlawfirm.com) <sgallagher@fraserlawfirm.com>; Singh, Amit (AG) <SinghA9@michigan.gov>; Sonneveldt, Daniel (AG) <SonneveldtD@michigan.gov>; spencer.sattler@cmsenergy.com; Taylor, Nicholas (AG) <TaylorN10@michigan.gov>; Thoits, Jonathan (LARA) <ThoitsJ@michigan.gov>; Bret A. Totoraitis <Bret.Totoraitis@cmsenergy.com>; University Chicago Law Clinic <aelc_mpsc@lawclinic.uchicago.edu>; Wollenzien, Lucas (AG) <WollenzienL@michigan.gov>
Subject: Case No. U-21870

Good Afternoon,

Attached in the above-referenced matter is MPSC Staff's Application for Leave to Appeal the Denial of Staff's Motion to Amend the July 8, 2025, Scheduling Memorandum, together with Proof of Service, which was e-filed with the MPSC and is being sent VIA E-MAIL ONLY.

Thank you.

Cherie A. R. Shea

Division Head Secretary

Michigan Dept. of Attorney General

Public Service Division

Phone: (517) 284-8140 (working remotely - voicemail messages only)

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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 the generation and distribution of electricity and for other relief.

Case No. U-21870

PROOF OF SERVICE

On the date below, an electronic copy of **Motion for Leave to Respond to Staff's Application for Leave and Brief in Support by Michigan Environmental Council, Natural Resources Defense Council, Sierra Club, and Citizens Utility Board of Michigan, and Exhibit A through Exhibit C** was served on the following:

Name/Party	E-mail Address
ALJ Jonathan F. Thoits	thoitsj@michigan.gov
Consumers Energy Company Anne M. Uitvlugt Bret A. Totoraitis Evan B. Keimach Gary A. Gensch Jr. Spencer A. Sattler Kelly Hall Mark R. Ruskiewicz	mpsc.filings@cmsenergy.com anne.uitvlugt@cmsenergy.com bret.totoraitis@cmsenergy.com evan.keimach@cmsenergy.com gary.genschjr@cmsenergy.com spencer.sattler@cmsenergy.com kelly.hall@cmsenergy.com mark.ruskiewicz@cmsenergy.com
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Michigan Public Service Commission Staff Daniel E. Sonneveldt Nicholas Taylor Michael J. Orris Lori Mayabb Amit T. Singh Alena M. Clark Adam M. Cozort	sonneveldtd@michigan.gov taylorl10@michigan.gov orrism@michigan.gov mayabbl@michigan.gov singha9@michigan.gov clarka55@michigan.gov cozortal@michigan.gov
Great Lakes Renewable Energy Association Don L. Keskey Carol Dane	dkeskey@publiclawresourcecenter.com cdane@publiclawresourcecenter.com
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Association of Businesses Advocating Tariff Equity (ABATE) Stephen A. Campbell Benjamin J. Holwerda Michael J. Pattwell James Dauphinais Lauren Degnan Christina Hildebrandt Jessica York	scampbell@clarkhill.com bholwerda@clarkhill.com mpattwell@clarkhill.com jdauphinais@consultbai.com ldegnan@clarkhill.com childebrandt@consultbai.com jyork@consultbai.com
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The Ecology Center, Environmental Law & Policy Center, Union of Concerned Scientists, and Vote Solar (CEO) Daniel Abrams Katie Duckworth Alondra Estrada Katie Toolan	MPSCDocket@elpc.org dabrams@elpc.org kduckworth@elpc.org aestrada@elpc.org ktoolan@elpc.org
Michigan Electric Transmission Company Olivia R.C.A. Flower Richard J. Aaron Courtney F. Kissel Anthony J. Hunt Hannah Buzolits	mpscfilings@dykema.com oflower@dykema.com raaron@dykema.com ckissel@dykema.com ahunt@dykema.com HBuzolits@dykema.com

[signature page below]

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

Troposphere Legal, PLC
Counsel for MNSC

Date: October 13, 2025

By: _____
Natasha Fowles, Legal Assistant
420 E. Front St.
Traverse City, MI 49686
Phone: 231-709-4000
Email: natasha@tropospherelegal.com