



THE UNIVERSITY OF CHICAGO
THE LAW SCHOOL
Abrams Environmental
Law Clinic

October 30, 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:

Please find enclosed Urban Core Collective's Motion under Michigan Administrative Code Section R. 792.10419 for Participation by a Law Student, along with proof of service, for electronic filing in the above-referenced matter.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark N. Templeton'.

Mark N. Templeton, *pro hac vice*
6020 S. University Avenue
Chicago, IL 60637
Phone: (773) 702-9611
Email: templeton@uchicago.edu

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 FROM INTERVENOR URBAN CORE COLLECTIVE
UNDER MICHIGAN ADMINISTRATIVE CODE SECTION R. 792.10419
FOR PARTICIPATION BY A LAW STUDENT**

Undersigned counsel hereby respectfully moves for leave to have Ms. Jacqueline Hillman, a law student at the University of Chicago, participate in this proceeding pursuant to Michigan Administrative Code Section R. 792.10419 to conduct focused cross examination of Consumers Energy Company's (Consumers) witnesses. In further support of this motion, I state as follows:

1. Michigan Administrative Code Section R. 792.10419(3) applies in this proceeding and provides that the "presiding officer may, in his or her discretion, permit law students or recent law student graduates who are members of legal aid clinics . . . to represent a person to the same extent as permitted in the circuit courts of this state."

2. Ms. Hillman is a "student in a law school approved by the American Bar Association" and is eligible to appear pursuant to Michigan Court Rule 8.120(C). Ms. Hillman has "received a passing grade in law school courses and has completed the first year." Ms. Hillman currently participates in the Abrams Environmental Law Clinic, a qualifying legal aid clinic under Michigan Court Rule 8.120(A). The Dean of the University of Chicago Law School, through the authority delegated to the Law School's

Registrar, certifies that Ms. Hillman satisfies these requirements, as required by Rule 8.120(C).

(Exhibit A)

3. Representation of Intervenor Urban Core Collective is part of a clinical program at the University of Chicago Law School that is designed to provide representation to nonprofit environmental organizations and to provide meaningful advocacy experience for qualified law students. Under the my supervision, University of Chicago Law School students conducted cross examinations of witnesses in several hearings, including in U-20471 (DTE Electric Company's 2019 IRP case), U-20561 (DTE Electric Company's 2019 rate case), U-20713 (DTE Electric Company's 2020 Voluntary Green Pricing case), U-21090 (Consumers' 2021 IRP case), U-21193 (DTE Electric Company's 2022 IRP case), U-21172 (DTE Electric Company's 2022 Voluntary Green Pricing case), and U-21389 (Consumers' 2023 rate case).

4. Ms. Hillman is an integral part of the representation of the Intervenor and has participated in the preparation for these proceedings, including reviewing discovery responses and Company, MSPC Staff, and Intervenor testimony and rebuttal testimony. She will also assist in drafting the Urban Core Collective's briefs. Ms. Hillman knows the facts and the relevant law extremely well and is qualified to participate, including in the cross-examination of witnesses. Furthermore, I am supervising her preparation for cross-examination, and I or another Clinic attorney will be present and responsible for the conduct of Ms. Hillman at the hearing.

5. Intervenor Urban Core Collective has consented to Ms. Hillman's representation in this case. I have attached an affidavit from Urban Core Collective to this motion. (Exhibit B)

6. Michigan Court Rule 8.120(C) requires that the "student or graduate must certify in writing that he or she has read and is familiar with the Michigan Rules of Professional Conduct and the Michigan Court Rules and shall take an oath which is reasonably equivalent to the Michigan Lawyer's

Oath.” Accordingly, Ms. Hillman has submitted the attached affidavit that swears to the above.
(Exhibit C).

7. We have conferred with Consumers and MPSC Staff regarding this motion. Consumers and MPSC Staff do not oppose this motion. Consumers and Urban Core Collective have agreed that an attorney for Urban Core Collective will not perform an additional cross examination of the same Consumers witness before or after the student’s cross examination. Urban Core Collective does not intend to cross examine any witness from any other entity in this proceeding, other than reserving the right to ask follow-up questions, which would be conducted by an attorney, not a student law intern.

Wherefore, for the foregoing reasons, undersigned counsel respectfully requests leave from this Court to have the named law student conduct cross examination.

Respectfully submitted this 30th day of October 2025.

Sincerely,



Mark N. Templeton, *pro hac vice*
Abrams Environmental Law Clinic
University of Chicago Law School
6020 South University Avenue
Chicago, IL 60637
Phone: (773) 702-9611



1111 East 60th Street |
Chicago, Illinois 60637
phone 773-834-3223 | fax
773-834-1220

Oct. 17, 2025

To: State of Michigan

Re: Rule 8.120 Law Students and Recent Graduates; Participation in Legal Aid Clinics, Defender Offices, and Legal Training Program.

Law Student: Jacqueline Hillman

To Whom It May Concern:

I have reviewed the requirements of Michigan Court Rule 8.120(C) and hereby affirm that the above named student meets each requirement thereof with respect to their law school performance and status. Jacqueline Hillman is expected to graduate on June 6, 2026.

Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to be "JD", written in a cursive style.

Jeana Driggers

Assistant Dean of Students and Registrar

The University of Chicago | The Law School

1111 East 60th Street | Room 305D | Chicago, IL 60637

Ph. (773) 834-5315 | jdriggers@uchicago.edu

Urban Core Collective
413 Hall St. SE #1
Grand Rapids, MI 49507
October 27, 2025

Administrative Law Judge Jonathan F. Thoits
Michigan Public Service Commission
7109 W. Saginaw Hwy.
P.O. Box 30221
Lansing, MI 48917

RE: Student Participation on Behalf of Urban Core Collective in Case U-21870

I am the Climate Justice Catalyst of Intervenor Urban Core Collective (UCC), and I am authorized to represent UCC with regard to legal matters such as this proceeding. I hereby consent to the participation of University of Chicago Law Student Jacqueline Hillman in case number U-21870 on behalf of Urban Core Collective.

Sincerely,

Sergio Cira-Reyes

Sergio Cira-Reyes (Oct 27, 2025 14:46:18 EDT)

Sergio Cira-Reyes
Climate Justice Catalyst
Urban Core Collective

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Case No. U-21870

ALJ Jonathan F. Thoits

AFFIDAVIT OF JACQUELINE HILLMAN

Jacqueline Hillman of 5252 S. Cornell Avenue, Apt. 2002, Chicago, Illinois, being first
sworn states that:

1. I have read and am familiar with the Michigan Rules of Professional Conduct and the Michigan Court Rules;
2. I will support the Constitution of the United States and the Constitution of the State of Michigan;
3. I will maintain the respect due to courts of justice and judicial officers;
4. I will not counsel or maintain any suit or proceeding which shall appear to me to be unjust, nor any defense except such as I believe to be honestly debatable under the law of the land;
5. I will employ for the purpose of maintaining the causes confided to me such means only as are consistent with truth and honor, and will never seek to mislead the judge or jury by any artifice or false statement of fact or law;

6. I will maintain the confidence and preserve inviolate the secrets of my client, and will accept no compensation in connection with my client's business except with my client's knowledge and approval;
7. I will abstain from all offensive personality, and advance no fact prejudicial to the honor or reputation of a party or witness, unless required by the justice of the cause with which I am charged;
8. I will never reject, from any consideration personal to myself, the cause of the defenseless or oppressed, or delay any cause for lucre or malice;
9. I will in all other respects conduct myself personally and professionally in conformity with the high standards of conduct imposed upon members of the bar as conditions for the privilege to practice law in this State.

FURTHER AFFIANT SAYETH NOT

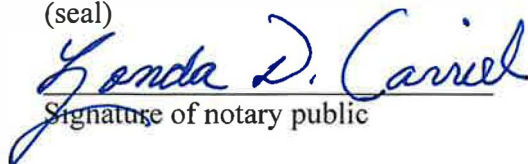


Jacqueline Hillman
J.D. Candidate 2026
The University of Chicago Law School
October 29, 2025

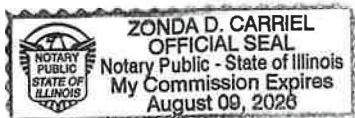
State of Illinois
County of COOK

Signed and sworn (or affirmed) before me on October 29, 2025 (date)
by Jacqueline Hillman (name of person making statement).

(seal)



Signature of notary public



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

PROOF OF SERVICE

I, Mark Templeton, certify that on October 30, 2025, the persons below were served an electronic copy of Intervenor Urban Core Collective’s Motion under Michigan Administrative Code Section R. 792.10419 for Participation by a Law Student.

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. Ruszkiewicz Spencer A. Sattler Bret A. Totoraitis Kelly Hall	mpsc.filings@cmsenergy.com gary.genschjr@cmsenergy.com anne.uitvlugt@cmsenergy.com evan.keimach@cmsenergy.com mark.ruszkiewicz@cmsenergy.com spencer.sattler@cmsenergy.com bret.totoraitis@cmsenergy.com kelly.hall@cmsenergy.com
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Michigan Public Service Commission Daniel E. Sonneveldt Amit T. Singh Nicholas Q. Taylor Alena M. Clark Adam M. Cozort Michael J. Orris Mike Byrne Bill Stosik David Chislea Bob Nichols Nick Revere Lori Mayabb	sonneveldtd@michigan.gov singha9@michigan.gov taylorn10@michigan.gov clarka55@michigan.gov cozortal@michigan.gov orrism@michigan.gov byrneM@michigan.gov stosikb@michigan.gov chislead@michigan.gov nicholsb1@michigan.gov reveren@michigan.gov mayabbl@michigan.gov

<p>Citizens Utility Board of Michigan, Michigan Environmental Council, Natural Resources Defense Council, Sierra Club Christopher M. Bzdok Holly L. Hillyer Tracy Jane (TJ) Andrews Natasha Fowles Sean Clark Tanya Stasio Jordan Burt Tyler Comings Caroline Palmer John Liskey Matt Bandyk Rick Bunch Julielyn Gibbons Jackson Neme</p>	<p>chris@tropospherelegal.com holly@tropospherelegal.com tjandrews@tropospherelegal.com natasha@tropospherelegal.com sean@tropospherelegal.com tanya.stasio@eaclinic.org Jordan.burt@aeclinic.org Tyler.comings@aeclinic.org cpalmer@synapse-energy.com john@liskeypllc.com mbandyk@synapse-energy.com rbunch@5lakesenergy.com jgibbons@5lakesenergy.com jackson@tropospherelegal.com</p>
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The statements above are true to the best of my knowledge, information, and belief.

Date: October 30, 2025

Counsel for Urban Core Collective

By: /s/ Mark N. Templeton
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