



Carlton D. Watson
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November 13, 2025

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

RE: In the matter of the Application of **DTE GAS COMPANY** for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of natural gas and for miscellaneous accounting authority
MPSC Case No. U-21973

Dear Ms. Felice:

Attached for electronic filing in the above captioned matter are DTE Gas Company's Application, Proposed Notice of Hearing, the Commission's Non-Modifiable Protective Order and Nondisclosure Certificates, Testimony, and Exhibits. Also attached is the Proof of Service.

In addition, Exhibit A-12, Confidential Schedules B5.7 and B5.9, and Exhibit A-28, Confidential Schedule R1 will be hand delivered and filed under seal with the Commission. Confidential Workpapers are also being hand delivered and provided under seal. The exhibits with confidential schedules, and confidential workpapers will be made available to MPSC Staff and to persons associated with parties who have signed the appropriate Non-Disclosure Certificate upon issuance of the Protective Order in this proceeding. All public testimony, exhibits, and workpapers are accessible in the electronic link below:

[Home - U-21973 2025 Gas Rate Case](#)

Also provided to the MPSC by hand delivery on November 13, 2025 for filing via external storage drive are DTE Gas Company's Part II – Financial Information materials, Part III – Supplemental Data and electronic files (which are also being provided in the electronic link above).

Very truly yours,

Carlton D. Watson

CDW/erb
Attachments
cc: Service List

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of)
DTE GAS COMPANY for authority)
to increase its rates, amend its rate)
schedules and rules governing the)
distribution and supply of natural gas,)
and for miscellaneous accounting authority)
_____)

Case No. U-21973

APPLICATION

DTE GAS COMPANY (DTE Gas, Company, or Applicant) files this Application requesting authority to increase rates, amend its rates schedules, obtain approval of certain accounting matters and modify certain terms and conditions of providing natural gas services. In support of this Application, DTE Gas represents to the Michigan Public Service Commission (MPSC or Commission) as follows:

1. DTE Gas is a subsidiary of DTE Energy Company, which is a Michigan corporation with its principal offices located at One Energy Plaza, Detroit, Michigan, 48226. DTE Gas is a public utility subject to the jurisdiction of the MPSC and is engaged in the acquisition, storage, transportation, distribution and sale of natural gas and other related services to approximately 1.3 million residential, commercial and industrial customers within the State of Michigan.

2. DTE Gas is currently providing service to its retail natural gas transportation, storage and distribution customers under rates, terms and conditions established in the Commission's orders issued on November 7, 2024, and February 27, 2025, in Case No. U-21291. These rates were implemented effective for service rendered on and after November 21, 2024. Following the November 7, 2024 Order, DTE Gas and other parties filed petitions for rehearing.

On February 27, 2025, the Commission issued an order that partially granted DTE Gas's petition. Rates consistent with the revenue deficiency approved by the February order on rehearing were implemented on a service-rendered basis for service provided on and after March 13, 2025.

3. This Application is being filed in accordance with the filing requirements contained in the Commission's Order in Case No. U-18238, dated April 25, 2024.

4. DTE Gas's business objectives continue to be the provision of safe, reliable, cost-effective and environmentally responsible service to its customers. This includes quality customer service and efficient system operation that ensures the safety of the Company's customers and employees, and the delivery of this service at a reasonable cost. The Case No. U-21291 Order was intended to provide DTE Gas with a reasonable opportunity to earn its authorized return for the period of October 1, 2024 through September 30, 2025. However, DTE Gas's current authorized rates are not expected to continue providing such opportunity beginning on October 1, 2026. Thus, the proposed revenue increase described in this filing is necessary to allow the Company to continue providing safe and reliable gas service, to meet customers' service quality expectations, and to allow the Company a reasonable opportunity to recover its costs of operation including a reasonable rate of return beginning in October 2026.

5. Additional revenues are necessary to pay for the impacts of extensive infrastructure investments, additional projected operation and maintenance expense required to ensure reliability of the system, the safety of customers, compliance with State and Federal requirements, collective bargaining and market-driven wage increases, and lower forecasted sales. DTE Gas's testimony and exhibits, filed contemporaneously with this Application, evince a need for additional annual revenue, effective October 1, 2026. Attachment 1 summarizes the Company's request.

6. DTE Gas requests that the Commission authorize the Company to adjust its retail

natural gas distribution rates to reflect a net revenue deficiency of \$162.7 million for the twelve-months ended September 30, 2027 projected test year. The net revenue deficiency is comprised of a total revenue deficiency of \$237.5 million, net of the IRM roll-in of \$74.8 million. DTE Gas proposes to allocate the required gas revenue increase among rate classes as set forth on Attachment 2 to this Application. A comparison of typical bills under current and proposed rates including IRM is shown on Attachment 3 to this Application.

7. In accordance with the Commission's filing requirements, the Company's historical year presentation reflects the 12-month period ended December 31, 2024. DTE Gas's rate relief request is based upon the 12-month period ended December 31, 2024, normalized historical test year adjusted for known and measurable changes, as supported by the Company's witnesses in this case, to arrive at the Company's October 1, 2026 through September 30, 2027 projected test year. The projected test year includes: (i) capital expenditures planned for the Gas Renewal Program (GRP), routine capital, and other non-routine capital; (ii) increases in operation and maintenance expenses that are projected to be incurred to provide safe and reliable service; and (iii) capital structure cost changes.

8. DTE Gas is proposing to continue the Revenue Decoupling Mechanism (RDM) approved in Case No. U-21291 as a "simple revenue tracker" that reconciles Case No. U-21973 distribution revenue, excluding gas cost recovery (GCR) revenues, surcharges and customer charges, with actual weather normalized distribution revenue, excluding GCR revenues, surcharges and the customer charges.

9. DTE Gas is proposing to continue the Infrastructure Recovery Mechanism (IRM) in this proceeding with two adjustments: DTE Gas is proposing to (1) include Cathodic Protection and (2) include Regulatory Station Replacement Program as part of the IRM. The proposed

adjusted IRM Surcharge will begin on January 1, 2027 for IRM related capital expenditures and continue until the Commission orders new rates in the Company's next general rate proceeding.¹

10. The Company is requesting a Return on Equity of 10.25%, capital structure of 49.25% debt and 50.75% equity, and application of annual inflation factors of 3.0% in 2025, 2.9% in 2026, and 2.9% in 2027.²

11. DTE Gas is requesting that the Commission grant the Company the authority to recover Manufactured Gas Plant (MGP) expenses, which is allowed under MCL 460.6a(1), in setting its projected MGP amortization for the projected year.³

12. DTE Gas is requesting that the Commission approve specific accounting authority including, but not limited to, adjusted regulatory asset and liability treatment for low-income assistance customer credits and a shared asset deferral mechanism. DTE Gas is seeking the continuation of regulatory asset treatment for Pension and Other Post-Employment Benefit (OPEB) financing costs to mimic the current capitalization practice that includes all cost components plus the continued deferral of pension and OPEB costs. Additionally, DTE Gas is asking for the continuation of deferral accounting for leak detection and repair costs and the continuation of the incentive compensation deferral.⁴

13. Pursuant to the directives of the Commission's November 7, 2024 Order in Case No. U-21291, DTE Gas has included the following in its filing in this case:

- Forecasted yearly sales for each major customer class for the 10-year gas delivery planning horizon⁵,
- Itemized listing of projected costs associated with the Company's corporate

¹ The details and support for this request are presented in the testimony of DTE Gas Witnesses Shpargel, Janness, and Uzenski.

² The details and support for these requests are presented in the testimony of DTE Gas Witnesses Nelson, Lepczyk, Uzenski, and Vangilder.

³ The details and support for this request are presented in the testimony of DTE Gas Witness Dziekan.

⁴ The details and support for this request are presented in the testimony of DTE Gas Witness Uzenski.

⁵ This information is provided in the direct testimony of DTE Gas Witnesses Decker.

membership fees⁶

- Updated Gas Delivery Plan filed in both the instant docket and in Case No. U-21291⁷
- Utilization of the MiEJScreen Tool in the Company's planning processes⁸

14. Applicant is filing the direct testimony and exhibits of 22 witnesses concurrently with this Application. The contents, recommendations, revenue and expense items and proposed ratemaking set forth in these documents are incorporated in this Application by reference.

15. Applicant also submits concurrently with this Application a Proposed Protective Order, Attachment 4, and asks that the Administrative Law Judge address arguments on the Proposed Protective Order and enter it at the prehearing.

16. The fact that Applicant may not address an item or position addressed by Applicant in previous cases, or which is presently on appeal before the courts, does not constitute a waiver of such item or position by the Company, or of any rights or positions that the Company may wish to take on these matters in this or any other proceedings before the Commission (now or in the future), or in any other appropriate court or venue (now or in the future).

17. Also included with this filing is Attachment 5, the Proposed Notice of Hearing.

WHEREFORE, Applicant requests that the Commission:

- A. Accept this Application for filing;
- B. Give such notice to interested parties as may be required by statute or the Commission's rules;
- C. Establish a date, place and time for a prehearing conference;

⁶ This information is provided in the direct testimony of DTE Gas Witness Huffman.

⁷ This information is provided in the direct testimony of DTE Gas Witnesses Fedele and Decker.

⁸ This information is provided in the direct testimony of DTE Gas Witnesses Fedele and Janness.

- D. Conduct a hearing on this Application to authorize the Company to adjust its retail natural gas distribution rates to reflect the annual revenue deficiency as described in this Application and the Company's Direct Testimony and Exhibits, based upon an October 1, 2026 through September 30, 2027 test year with new rates effective as soon as possible on or after October 1, 2026;
- E. Enter an Order approving recovery of DTE Gas's proposed new rates effective no later than October 1, 2026, in the manner described in this Application (including Attachments 1, 2 and 3) and the Company's Direct Testimony and Exhibits;
- F. Enter its Order acknowledging that DTE Gas has satisfied all of the directives of the Commission Order in Case No. U-21291, which were required components of the Company's subsequent general rate case;
- G. Enter an Order approving the Company's recovery of the requested infrastructure related capital and the associated infrastructure recovery mechanism;
- H. Enter an Order approving the Company's capital structure and return on investment;
- I. Enter an Order approving the recovery of DTE Gas's projected MGP expenses;
- J. Enter an Order approving the Company's proposal to amend certain customer rate schedules and proposed tariff changes;
- K. Enter an Order authorizing implementation or continuation of the miscellaneous accounting changes as described in this Application, testimony and exhibits of the Company's witnesses in this case;

- L. Grant any other relief described in this Application as requested by the Company; and
- M. Grant DTE Gas such further additional relief as the Commission deems appropriate.

Respectfully submitted,

DTE GAS COMPANY
Legal Department

By: _____
ATTORNEYS FOR APPLICANT
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One Energy Plaza, 1635 WCB
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(313) 235-6648

DTE GAS COMPANY

By: _____
Marco A. Bruzzano
Senior Vice President – Regulatory Affairs

Dated: November 13, 2025

DTE Gas Company

Revenue Deficiency by Major Component

(Measured off Currently Effective Rates Per 2025 MPSC Reahearing Order in U-21291)

(\$ in Millions)

Line	Description (Col. a)	Projected Deficiency (Col. b)
1	Rate Base Related Changes (Return On & Of Investments & Property Taxes)	\$ 133.9
2	Capitalization Related Changes (Capital Structure and Total Debt Costs)	41.0
3	<u>Net Operating Income Related Changes</u>	
4	Retail Sales and End User Transportation Decreases / (Increases)	30.0
5	Mid-Stream Revenue Decreases / (Increases)	(20.6)
6	Other Operating Revenue Decreases / (Increases)	(3.3)
7	Lost Gas & Company Use Increases / (Decreases)	(12.6)
8	O&M Increases / (Decreases)	79.0
9	AFUDC & Other Changes	<u>(10.0)</u>
10	Base Revenue Deficiency / (Sufficiency)	237.5
11	Impact due to IRM Roll-in to Rate Base	<u>(74.8)</u>
12	Net Revenue Deficiency / (Sufficiency)	<u>\$ 162.7</u>

DTE Gas Company
Summary of Projected Test Year Ending 09/30/2027 Proposed Gas Revenue Increase

	(a)	(b)	(c)	(d)	(e)	(f)
Line No.	Rate Class	Test Year MMcf	Annual Operating Revenues (\$000)		Increase / (Decrease)	
			Current (1)	Proposed (2)	Revenues (\$000)	Percent
	<u>Residential</u>					
1	Rate A	109,843	1,170,694	1,263,541	92,847	7.93%
2	Rate 2A	3,698	36,563	39,786	3,223	8.81%
3	Total Residential Services	113,541	1,207,258	1,303,327	96,070	7.96%
	<u>General Services</u>					
4	GS-1/GS-2	39,158	394,758	422,873	28,115	7.12%
5						
	<u>School</u>					
6	Rate S	1,533	11,727	12,509	782	6.67%
7	Subtotal Gas Sales Revenues	154,232	1,613,742	1,738,709	124,967	7.74%
	<u>Transportation</u>					
8	Rate ST	16,756	42,631	58,524	15,893	37.28%
9	Rate LT	18,961	29,389	39,813	10,424	35.47%
10	Rate XLT	29,367	32,501	44,446	11,945	36.75%
11	Rate XXLT	75,728	36,087	38,919	2,832	7.85%
12	Exelon	10,393	14,784	22,663	7,879	53.30%
13	Total Transportation Services	151,205	155,392	204,365	48,973	31.52%
14	Total Revenues	305,437	1,769,134	1,943,074	173,940	9.83%
15	Less: Cost of Gas (included above)		565,375	565,375	-	
16	Less: Current IRM Surcharge Revenues (included above)		84,779	-	(84,779)	
17	Less: Proposed IRM Surcharge Revenues (included above)		-	21,259	21,259	
18	Less: Current EWR Surcharge Revenues (included above)		59,607	59,607	-	
19	Base Revenues		1,059,373	1,296,833	237,460	22.42%

(1) Projected test year billing determinants at current base rates including IRM, cost of gas (sales rate schedules only), and EWR revenues

(2) Projected test year billing determinants at proposed base rates including IRM, cost of gas (sales rate schedules only), and EWR revenues

DTE Gas Company
Comparison of Typical Bills Under Current and Proposed Rates Including IRM

Residential Class - Rate A

Average Monthly Usage:

72 Ccf

	(a)	(b)	(c)	(d)	(e)
Line No.	Distribution Volumes (Ccf)	Current Monthly Bill	Proposed Monthly Bill	Increase/ (Decrease) (Col. c - Col. b)	Percent Change (Col. d / Col. b)
1	0	\$ 18.02	\$ 16.18	\$ (1.84)	-10.19%
2	25	\$ 39.07	\$ 40.00	\$ 0.93	2.38%
3	50	\$ 60.12	\$ 63.81	\$ 3.70	6.15%
4	72	\$ 78.86	\$ 85.02	\$ 6.16	7.81%
5	75	\$ 81.16	\$ 87.62	\$ 6.46	7.96%
6	100	\$ 102.21	\$ 111.44	\$ 9.23	9.03%
7	150	\$ 144.31	\$ 159.07	\$ 14.76	10.23%
8	200	\$ 186.41	\$ 206.70	\$ 20.29	10.88%
9	250	\$ 228.50	\$ 254.32	\$ 25.82	11.30%
10	300	\$ 270.60	\$ 301.95	\$ 31.35	11.59%

11	Customer Charge (per Month)	\$ 14.50	\$ 15.40
12	Distribution Charge (per Mcf)	\$ 4.4732	\$ 5.5795
13	Cost of Gas (per Mcf)	\$ 3.6657	\$ 3.6657
14	IRM (per Month) (1)	\$ 3.52	\$ 0.78
15	EWR (per Mcf)	\$ 0.2805	\$ 0.2805

(1) Current Monthly Bill includes 2026/2027 IRM charge approved in U-21291 and Proposed Monthly Bill includes 2027 IRM charge proposed in U-21973

STATE OF MICHIGAN
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to increase its rates, amend its rate)
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and for miscellaneous accounting authority)
_____)

Case No. U-21973

PROTECTIVE ORDER

This Protective Order governs the use and disposition of Protected Material that any Party discloses to another Party during the course of this proceeding. This Protective Order protects non-public, confidential information and materials so designated by the Disclosing Party as Protected Material, as defined herein. Accordingly, it is ordered:

I. “Protected Material” and Other Definitions

A. “Protected Material” consists of trade secrets or confidential, proprietary, or commercially sensitive information provided in Disclosing Party’s application, exhibits, discovery or audit responses, any witness’ related exhibits and testimony, motions, objections, briefing, responses to an order issued by the presiding hearing officer or the Michigan Public Service Commission (“MPSC” or the “Commission), and any arguments of counsel describing or relying upon the Protected Material. Subject to challenge under Paragraph IV.A, Protected Material shall also consist of non-public confidential information and materials including, but not limited to, the following information disclosed during the course of this case if it is marked as required by this Protective Order:

1. To the extent permitted, information obtained under license from a third-party licensor, to which the Disclosing Party or witnesses engaged by the Disclosing Party is a licensee, that is subject to any confidentiality or non-transferability clause. This information includes reports; analyses; models (including related inputs and outputs); trade secrets; and confidential, proprietary, or commercially sensitive information that the Disclosing Party or one of its witnesses receives as a licensee and is authorized by the third-party licensor to disclose consistent with the terms and conditions of this Protective Order.
2. Information that is protected as confidential in another jurisdiction that the Applicant provides utility service, and the source of the other jurisdiction's protective designation is made known to the Receiving Party.

B. The information subject to this Protective Order does not include:

1. Information that is or has become available to the public through no fault of the Receiving Party or Reviewing Representative and no breach of this Protective Order, or information that is otherwise lawfully known by the Receiving Party without any obligation to hold it in confidence;
2. Information received from a third party free to disclose the information without restriction;
3. Information that is approved for release by written authorization of the Disclosing Party, but only to the extent of the authorization;
4. Information that is required by law or regulation to be disclosed, but only to the extent of the required disclosure; or Information that is disclosed in response to a valid, non-appealable order of a court of competent jurisdiction or governmental body, but only to the extent the order requires.

C. "Applicant" refers to the filing party in this proceeding.

D. "Disclosing Party" means a Party producing Protected Material in this proceeding.

E. "Party" refers to the Applicant, MPSC Staff ("Staff"), Michigan Attorney General, or any other person, company, organization, or association that is granted intervention in this case under the Commission's Rules of Practice and Procedure, Mich Admin Code, R 792.10401 et al.

F. "Receiving Party" means any Party to this proceeding who requests or receives

access to Protected Material. A Receiving Party is responsible for assuring that persons, representatives, or agents under its control or supervision comply with this Protective Order.

G. “Reviewing Representative” means a representative of the Receiving Party who is:

1. An attorney who has entered an appearance in this proceeding for a Receiving Party;
2. An attorney, paralegal, or other employee associated, for the purpose of this case, with an attorney described in Paragraph I.G.1;
3. An expert or employee of an expert retained by a Receiving Party to advise, prepare for, or testify in this proceeding; or an employee or other representative of a Receiving Party with significant responsibility in this case.

H. “Nondisclosure Certificate” refers to Attachment 1 to this Protective Order.

Except as otherwise provided herein, the Reviewing Party and Reviewing Representatives will be required to sign Nondisclosure Certificates. However, Nondisclosure Certificates will not be required from administrative law judges, members of the Commission and its support staff, Staff (excluding consultants, third-party experts, agents or other similar persons), and Staff counsel, for whom by virtue of their employment are presumed to be bound by the terms of this Protective Order.

II. Access to and Use of Protected Material

A. This Protective Order governs the use of all provided Protected Material. This Protective Order protects: (i) the Protected Material; (ii) any copy or reproduction of the Protected Material made by any person; and (iii) any memorandum, handwritten notes, or any other form of information that copies, contains, or discloses Protected Material. All Protected Material in the possession of a Receiving Party and a Reviewing Representative shall be maintained in a secure place. Access to Protected Material shall be limited to the Receiving

Party and the Reviewing Representative, after each has executed the Nondisclosure Agreement and provided a copy of the Nondisclosure Agreement to the Disclosing Party, subject to the limited exception in Paragraph I.H.

B. Protected Material must be used and disclosed by the Receiving Party solely in accordance with the terms and conditions of this Protective Order. A Receiving Party and Reviewing Representative may analyze the Protected Material; make or respond to discovery; present evidence; prepare testimony, argument, briefs, or other filings; prepare for cross-examination; consider strategy; and evaluate settlement. A Reviewing Representative shall not release or disclose the content of Protected Material to any other person or use the information for any other purpose.

C. The Disclosing Party may request the Receiving Party withhold certain information from a Reviewing Representative and retains the right to object to any designated Reviewing Representative if the Disclosing Party has reason to believe that there is an unacceptable risk of misuse of confidential information. If a Disclosing Party objects to a Reviewing Representative, then the Disclosing Party shall submit the dispute to the presiding hearing officer simultaneously upon objection. If the Disclosing Party notifies a Receiving Party of an objection to a Reviewing Representative, then the Protected Material shall not be provided to that Reviewing Representative until the objection is resolved by agreement or by the presiding hearing officer.

D. If a Receiving Party seeks access to Critical Energy Infrastructure Information (“CEII”) as defined in 16 U.S.C § 824o-1(a)(3) and FERC rules, specifically 18 CFR § 388.113(c), the Receiving Party and Reviewing Representative shall also sign the CEII Nondisclosure Certificate (Attachment 2 to this Protective Order) and provide a copy of the

executed CEII Nondisclosure Certificates to the Disclosing Party.

E. The obligations under this Protective Order do not expire by entry of a final order in this case and are enforceable by the MPSC or a court of competent jurisdiction. To the extent Protected Material is not returned to a Disclosing Party, it remains subject to this Protective Order. Members of the Commission, Commission staff assigned to assist the Commission with its deliberations, and the presiding hearing officer shall have access to all Protected Material that is submitted to the Commission under seal.

F. A Party retains the right to seek further restrictions on the dissemination of Protected Material to persons who have or may subsequently seek to intervene in this MPSC proceeding.

G. Nothing in this Protective Order precludes a Party from asserting a timely evidentiary objection to the proposed admission of Protected Material into the evidentiary record for this case.

III. Procedures

A. The Disclosing Party shall identify what portion(s) of any document designated confidential it considers confidential. This can be done through highlights or other clear identifier. The Disclosing Party must mark any information that it considers confidential as “CONFIDENTIAL: SUBJECT TO THE PROTECTIVE ORDER ISSUED IN CASE NO. U-U-21973.” Software executable files containing Protected Material may not be capable of being marked with the foregoing required protective language. The inability to mark software executable files containing Protected Material with such protective language shall not diminish the requirements of this Protective Order. It shall be sufficient if the medium used to deliver software executable files containing Protected Material is marked with the required protective

language. However, any output from the software executable files containing Protected Material that is generated only as a reproducible document, whether electronic or non-electronic, that is capable of being marked with the required protective language, shall be marked by the party who generated the output with such protective language and subject to the requirements of this Protective Order. If the Receiving Party or a Reviewing Representative makes copies of any Protected Material, they shall conspicuously mark the copies as Protected Material. Notes of Protected Material shall also be conspicuously marked as Protected Material by the person making the notes.

B. If a Receiving Party wants to quote, refer to, or otherwise use Protected Material in pleadings, pre-filed testimony, exhibits, cross-examination, briefs, oral argument, comments, or in some other form in this proceeding (including administrative or judicial appeals), the Receiving Party shall do so consistent with procedures that will maintain the confidentiality of the Protected Material. For purposes of this Protective Order, the following procedures apply:

1. Written submissions using Protected Material shall be filed in a sealed record to be maintained by the MPSC's Docket Section, or by a court of competent jurisdiction, in envelopes clearly marked on the outside, "CONFIDENTIAL – SUBJECT TO THE PROTECTIVE ORDER ISSUED IN CASE NO. U-21973." Simultaneously, identical documents and materials, with the Protected Material redacted, shall be filed and disclosed the same way that evidence or briefs are usually filed;
2. Oral testimony, examination of witnesses, or argument about Protected Material shall be conducted on a separate record to be maintained by the MPSC's Docket Section or by a court of competent jurisdiction. These separate record proceedings shall be closed to all persons except those furnishing the Protected Material and persons otherwise subject to this Protective Order. The Receiving Party presenting the Protected Material during the course of the proceeding shall give the presiding officer or court sufficient notice to allow the presiding officer or court an opportunity to take measures to protect the confidentiality of the Protected Material; and
3. Copies of the documents filed with the MPSC which contain Protected Material, including the portions of the exhibits, transcripts, or briefs that refer

to Protected Material, shall be marked or identified as, “CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER IN CASE NO. U-21973” and shall be maintained in a separate portion of the record under seal, segregated in the files of the Commission, and withheld from inspection by any person not bound by the terms of this Order.

C. The Protected Material subject to this Order shall be shielded from disclosure to the extent permitted by law. If any person files a request under the Freedom of Information Act (“FOIA”) with the MPSC or the Michigan Attorney General seeking access to documents subject to this Protective Order, the MPSC’s Executive Secretary, Staff, or the Attorney General shall promptly notify the Disclosing Party, and the Disclosing Party may take whatever legal actions it deems appropriate to protect the Protected Material from disclosure. In light of Section 5 of the Freedom of Information Act, MCL 15.235, the notice must be given at least five (5) business days before the MPSC, Staff, and/or the Michigan Attorney General grant the request in full or in part.

IV. Termination of Protected Status

A. A Receiving Party reserves the right to challenge by motion whether a document or information is Protected Material and whether this information can be withheld under this Protective Order. The Receiving Party challenging the protected status of the document must explicitly state its reason for challenging the confidential designation. In response to a motion, the Commission or the presiding hearing officer in this case may revoke a document’s protected status after notice and hearing. If the presiding hearing officer revokes a document’s protected status, then the document loses its protected status after 14 days unless a Party files an application for leave to appeal the ruling and a request for a stay to the Commission pursuant to R 792.10433. If the application for leave is timely, the document’s protected status will continue during the Commission appeal process. Any Party opposing the application for leave to appeal

and the stay shall file an answer with the Commission no more than 14 days after the filing and service of the appeal. Continued protected status post order, will be determined by the Commission in its order addressing the application for leave and the request for stay. Nothing in this paragraph shall prohibit the Disclosing Party from seeking a stay on appeal of the Commission's decision regarding the revocation of any document's protected status.

B. The Disclosing Party bears the burden of proving that the document should continue to be protected from disclosure.

V. Retention of Documents

Protected Material remains the property of the Disclosing Party and, except as required by applicable law and State retention schedules, only remains available to the Receiving Party until the time expires for petitions for rehearing of a final MPSC order, until the MPSC has ruled on all petitions for rehearing in this case (if any), or until judicial review is completed and the time to take further appeal has expired. If the Disclosing Party seeks to have the Receiving Party return all Protected Material in the Receiving Party's possession or in the possession of its Reviewing Representatives, or certify in writing that all Protected Material has been destroyed, it is the responsibility of the Disclosing Party to contact the Receiving Party and make its request no earlier than the expiration of time for filing petitions for rehearing of a final MPSC order, until the MPSC has ruled on all petitions for rehearing in this case (if any), or until judicial review is completed and the time to take further appeal has expired. Further, for a Receiving Party that is associated with the State, the request must be consistent with the expiration of the State retention requirement.

Notwithstanding the foregoing, counsel for the Receiving Party may maintain a single confidential file of Protected Material subject to all other provisions in this Order. Should

counsel seek to refer to the Protected Material in another Commission proceeding, the Disclosing Party must be the Applicant in said proceeding and counsel must ensure there is a protective order in said proceeding which protects the Protected Material from public disclosure.

VI. Limitations and Disclosures

This Protective Order does not apply to a particular document, or portion of a document, described in Paragraph II.A if a Receiving Party can demonstrate that it has been previously disclosed by the Disclosing Party on a non-confidential basis or meets the criteria set forth in Paragraphs I.B.1 through I.B.4. A Receiving Party intending to disclose information taken directly from materials identified as Protected Material must-before actually disclosing the information-do one of the following: (i) contact the Disclosing Party's counsel of record and obtain written permission to disclose the information, or (ii) challenge the confidential nature of the Protected Material and obtain a ruling under Paragraph IV that the information is not confidential and may be disclosed in or on the public record.

VII. Remedies

If a Receiving Party violates this Protective Order by improperly disclosing or using Protected Material, the Receiving Party shall take all necessary steps to remedy the improper disclosure or use. This includes promptly notifying all Parties and the presiding hearing officer in writing. The written notice must identify the person known or reasonably suspected to have obtained the Protected Material. A Party or person that violates this Protective Order remains subject to this paragraph regardless of whether the Disclosing Party could have discovered the violation earlier than it was discovered. This paragraph applies to both inadvertent and intentional violations. Nothing in this Protective Order limits the Disclosing Party's rights and remedies, at law or in equity, against a Party or person using Protected Material in a manner not authorized by this Protective Order, including the right to obtain injunctive relief in a court of

competent jurisdiction to prevent violations of this Protective Order.

VIII. Modification

Formal Addendums to this agreement may be established by an ALJ upon motion by any party and after notice and hearing.

MICHIGAN ADMINISTRATIVE HEARING SYSTEM
For the Michigan Public Service Commission

Administrative Law Judge

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of)
DTE GAS COMPANY for authority)
to increase its rates, amend its rate)
schedules and rules governing the)
distribution and supply of natural gas,)
and for miscellaneous accounting authority)
_____)

Case No. U-21973

Attachment 1

NONDISCLOSURE CERTIFICATE

By signing this Nondisclosure Certificate, I acknowledge that access to Protected Material is provided to me under the terms and restrictions of the Protective Order issue in Case No. U-21973, that I have read the Protective Order, and that I agree to be bound by the terms of the Protective Order.

Reviewing Representative:

Date: _____

Receiving Party:

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of)
DTE GAS COMPANY for authority)
to increase its rates, amend its rate)
schedules and rules governing the)
distribution and supply of natural gas,)
and for miscellaneous accounting authority)
_____)

Case No. U-21973

Attachment 2

NONDISCLOSURE CERTIFICATE

FOR CRITICAL ELECTRIC INFRASTRUCTURE INFORMATION

I hereby agree and certify my understanding that access to Critical Electric Infrastructure Information (“CEII”) as defined at 16 USC Section 824o-1(a)(3) and 18 CFR Section 388.113(c) is provided to me pursuant to the terms and restriction of this CEII Nondisclosure Certificate and the Protective Order issued in Case No. U-21973, that I have been given a copy of and have read the Protective Order, and I agree to be bound by the terms of this CEII Nondisclosure Certificate and the Protective Order. I further agree that:

1. I will use CEII only for the purpose for which it was requested;
2. I will only discuss CEII with a Party and/or Reviewing Representative;
3. I will keep CEII in a secure place in a manner that prevents unauthorized access;
4. I will destroy CEII or return it to the disclosing party upon request;
5. I understand that CEII is not subject to release under the Freedom of Information Act;

6. I understand that I am obligated to protect CEII even after a designation as CEII has lapsed until a determination by the administrative law judge that the information should no longer be designated as CEII; and

7. I will report all unauthorized disclosures of CEII to the Disclosing Party.

Reviewing Representative:

Date: _____

Title: _____

Receiving Party: _____

Printed Name: _____

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION
NOTICE OF HEARING
FOR THE NATURAL GAS CUSTOMERS OF
DTE GAS COMPANY
CASE NO. U-21973

- DTE Gas Company (DTE Gas) requests Michigan Public Service Commission approval to adjust its retail natural gas distribution rates to reflect a net revenue deficiency of 162.7 million, comprised of a total revenue deficiency of approximately \$237.5 million offset by the roll in of the \$74.8 million Infrastructure Recovery Mechanism already being paid by customers.
- **BASED UPON THE REQUEST, A TYPICAL RESIDENTIAL CUSTOMER'S AVERAGE NATURAL GAS DISTRIBUTION BILL MAY INCREASE BY ABOUT \$6 PER MONTH INCLUDING INFRASTRUCTURE RECOVERY MECHANISM (IRM) CHARGES.**
- The information below describes how a person may participate in this case.
- You may contact DTE Gas Company, One Energy Plaza, Detroit, Michigan 48226, (800) 477-4747, for a free copy of its application. Any person may review the application at the offices of DTE Gas Company.
- A public hearing in this matter will be held:

DATE/TIME: _____ **at 9:00 a.m.**

This will be a prehearing conference to determine future hearing dates and other procedural matters.

BEFORE: Administrative Law Judge _____

LOCATION: Michigan Public Service Commission
7109 West Saginaw Highway
Lansing, Michigan

PARTICIPATION: Any interested person may attend and participate. The hearing site is accessible, including handicapped parking. Persons needing any accommodation to participate should contact the Commission's Executive Secretary at (517) 284-8090 in advance to request mobility, visual, hearing or other assistance.

The Michigan Public Service Commission (Commission) will hold a public hearing to consider DTE Gas's November 13, 2025 application, which requests Commission approval to increase its rates, amend its rate schedules and rules governing the distribution and supply of natural gas and for miscellaneous accounting authority. Therefore, DTE Gas seeks Commission approval to adjust its retail natural gas distribution rates to reflect a net revenue deficiency of 162.7 million based upon an October 1, 2026 through September 30, 2027 test year with rates effective as soon as possible after October 1, 2026. The net revenue deficiency of \$162.7 million is comprised of a total revenue deficiency of \$237.5 million, net of the IRM roll-in of \$74.8 million. DTE Gas requests Commission approval for additional revenues to pay for the impacts of infrastructure and IT investments, projected operation and maintenance expense required to ensure reliability of the system, the safety of customers, and compliance with State and Federal

requirements, collective bargaining and market-driven wage increases, deferred tax acceleration and lower forecasted sales.

All documents filed in this case shall be submitted electronically through the Commission's E-Dockets website at: michigan.gov/mpscedockets. Requirements and instructions for filing can be found in the User Manual on the E-Dockets help page. Documents may also be submitted, in Word or PDF format, as an attachment to an email sent to mpscedockets@michigan.gov. If you require assistance prior to e-filing, contact Commission staff at (517) 284-8090 or by email at mpscedockets@michigan.gov.

Any person wishing to intervene and become a party to the case shall electronically file a petition to intervene with this Commission by _____. (Interested persons may elect to file using the traditional paper format.) The proof of service shall indicate service upon DTE Gas's attorney, Carlton Watson, One Energy Plaza, Detroit, Michigan 48226.

Any person wishing to appear at the hearing to make a statement of position without becoming a party to the case may participate by filing an appearance. To file an appearance, the individual must attend the hearing and advise the presiding administrative law judge of his or her wish to make a statement of position. All information submitted to the Commission in this matter becomes public information, thus available on the Michigan Public Service Commission's website, and subject to disclosure. Please do not include information you wish to remain private.

Requests for adjournment must be made pursuant to the Michigan Administrative Hearing System's Administrative Hearing Rules R 792.10422 and R 792.10432. Requests for further information on adjournment should be directed to (517) 284-8130.

A copy of DTE Gas's request may be reviewed on the Commission's website at michigan.gov/mpscedockets, and at the office of DTE Gas Company. For more information on how to participate in a case, you may contact the Commission at the above address or by telephone at (517) 284-8090.

Jurisdiction is pursuant to 1909 PA 300, as amended, MCL 462.2 et seq.; 1919 PA 419, as amended, MCL 460.54 et seq.; 1939 PA 3, as amended, MCL 460.1 et seq.; 1969 PA 306, as amended, MCL 24.201 et seq.; 1982 PA 304, as amended, MCL 460.6h et seq.; and the Michigan Administrative Hearing System's Administrative Hearing Rules, 2015 AC, R 792.10401 et seq.

November 13, 2025



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
PUBLIC SERVICE COMMISSION

ORLEANE HAWKS
DIRECTOR

SHAQUILA MYERS
COMMISSIONER

DAN SCRIPPS
CHAIRMAN

KATHERINE PERETICK
COMMISSIONER

November __, 2025
Case No. U-21973

Carlton Watson
DTE Gas Company
One Energy Plaza, #1635 WCB
Detroit, MI 48226-1279

Dear Mr. Watson:

DTE Gas Company shall mail, by ____, 2025, a copy of the enclosed notice of hearing to all cities, incorporated villages, townships and counties in its natural gas service area, and to all intervenors in Case No. U-21291. Proof of service shall be filed by the prehearing conference on ____, 2025.

DTE Gas Company shall cause the enclosed notice of hearing to be published, by ____, 2025, in daily newspapers of general circulation in its natural gas service area. Affidavits of publication shall be filed by the prehearing conference on ____, 2025.

DTE Gas Company shall, by ____, 2025, serve upon each person who has petitioned to intervene a copy of the written direct testimony of its proposed witnesses and the proposed exhibits as filed with the Commission. Proofs of service shall be filed with the Commission by ____, 2025.

Sincerely,

Lisa Felice
Executive Secretary

Enclosures

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

Case No. U-21973

PROOF OF SERVICE

[illegible]

ESTELLA R. BRANSON states that on November 13, 2025, she served a copy of DTE Gas Company's Application, Proposed Notice of Hearing, Commission Non-Modifiable Protective Order and Nondisclosure Certificates, Testimony and Exhibits, DTE Gas Company's Part II – Financial Information materials and Part III – Supplemental Data materials in the above captioned matter, via electronic mail and secure electronic link, upon the persons listed on the attached service list and Exhibit A-12, Confidential Schedules B5.7 and B5.9, and Exhibit A-28, Confidential Schedule R1 were filed under seal with the Commission.

ESTELLA R. BRANSON

**MPSC CASE NO. U-21973
U-20940 & U-21291 Joint Service List**

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**MPSC CASE NO. U-21973
U-20940 & U-21291 Joint Service List**

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MPSC CASE NO. U-21973
U-20940 & U-21291 Joint Service List

**SOULARDARITY; WE WANT GREEN,
TOO; URBAN CORE COLLECTIVE**

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