



November 20, 2025

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

*Via E-File*

RE: MPSC Case No. U-21973

Dear Ms. Felice:

Attached please find the enclosed documents for filing:

- Petition to Intervene by Michigan Environmental Council and Citizens Utility Board of Michigan;
- Appearances of Christopher M. Bzdok and Holly L. Hillyer; and
- Proof of Service.

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

Sincerely,

Christopher M. Bzdok  
[chris@tropospherelegal.com](mailto:chris@tropospherelegal.com)

CC: Parties to Case No. U-21973

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

U-21973

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**PETITION TO INTERVENE BY  
MICHIGAN ENVIRONMENTAL COUNCIL  
AND CITIZENS UTILITY BOARD OF MICHIGAN**

1. Michigan Environmental Council (MEC) and Citizens Utility Board of Michigan (“CUB”) (collectively, “MEC-CUB”) petition the Michigan Public Service Commission (the “Commission”) to intervene in the captioned proceeding.

2. MEC-CUB seeks to intervene in this case under Rule 410 of the Commission’s Rules of Practices and Procedure, R 792.10410, to represent the interests of its members in in reducing their natural gas bills and promoting their environmental well-being.

3. MEC is a statewide environmental organization with 100 member groups and a collective membership of over 300,000 people. These individuals live, use natural gas, and pay gas bills in Michigan, and thousands of them are within DTE Gas Company’s (DTE) service territory.

4. CUB is a Michigan nonprofit corporation organized to protect Michigan’s residential ratepayers from unreasonable and unnecessary utility rate increases. CUB has members that live, use natural gas, and pay gas bills in DTE’s service territory.

5. MEC-CUB’s members who are customers of DTE are directly affected by the rates, terms and conditions, and policies governing the provision of electricity by DTE to them. These

organizations and their members have a strong interest in having their natural gas needs met in a manner that is dependable, environmentally responsible, economically feasible, and provided at costs that are relatively stable over the long term.

6. These members have the potential to be harmed if they were required to incur higher costs and encounter environmental harm caused by imprudent utility practices.

7. The Michigan Public Service Commission recognizes two types of intervention.

a. First, 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 interest protected by the statute. See for example, *Association of Data Processing Service Organizations, Inc v Camp*, 397 US 150; 90 S Ct 827; 250 L Ed 184 (1970).

b. Second, permissive intervention, where 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. *In re Application of The Detroit Edison Co for Authority to Increase its Rates*, Case Nos. U-15768 and U-15751, January 11, 2010, Order, p. 7 (“*In re Detroit Edison*”).

8. MEC-CUB meets both tests and will provide useful information to the Commission and a unique perspective on the issues.

9. MEC-CUB’s members are within the zone of interests 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.

10. MEC-CUB has organizational standing because its members meet the zone of interests test. *In re Detroit Edison*, p. 8. See also *Drake v Detroit Edison*, 453 F Supp 1123, 1129 (WD Mich 1978) (“[A] plaintiff may be granted standing when he asserts interests not of his own

but of a third party that meet the zone of interests test.”).

11. MEC-CUB will bring significant expertise to bear in these proceedings. MEC and CUB’s staff and witnesses have extensive knowledge and experience in the areas of environmental, energy, and ratepayer advocacy. In addition, MEC-CUB has intervened and participated in numerous cases before the Commission to advocate for these issues, both individually and in coalition with other environmental organizations.

12. MEC and CUB have intervened in many Commission cases in Michigan.

13. MEC-CUB have also worked for years to advance policies through the legislative process that would benefit the public and the environment in these areas.

14. MEC-CUB plans to evaluate DTE’s application, testimony, and exhibits, and to conduct discovery, and then to raise those issues and take those positions that best serve the interests described above. MEC-CUB reserves the right to advance other issues as the case develops.

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

16. No other party adequately represents the interests of MEC-CUB and its members.

17. MEC-CUB requests that all notices and pleadings be served on:

Christopher M. Bzdok  
[chris@tropospherelegal.com](mailto:chris@tropospherelegal.com)

Holly L. Hillyer  
[holly@tropospherelegal.com](mailto:holly@tropospherelegal.com)

Sean C. Clark  
[sean@tropospherelegal.com](mailto:sean@tropospherelegal.com)

and on:

Natasha Fowles, Legal Assistant  
[natasha@tropospherelegal.com](mailto:natasha@tropospherelegal.com)

For the reasons just outlined, MEC-CUB respectfully requests that the Commission grant this petition to intervene and treat it as a party to this proceeding.

TROPOSPHERE LEGAL, PLC  
Counsel for MEC-CUB

Date: November 20, 2025

By: \_\_\_\_\_

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

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: DTE Gas Company Docket No. U-21973

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

1. (Name) Michigan Environmental Council
2. (Name) Citizens Utility Board of Michigan
3. (Name)
4. (Name)
5. (Name)
6. (Name)
7. (Name)

Name Christopher M. Bzdok  
Address 420 E. Front Street  
  
City Traverse City State MI  
Zip 49686 Phone ( 231 ) 709-4000  
Email chris@tropospherelegal.com  
Date 11/20/2025

<input type="checkbox"/> I am not an attorney
<input checked="" type="checkbox"/> I am an attorney whose:
Michigan Bar # is P- <u>53094</u>
_____ Bar # is: _____
( state )

Signature: \_\_\_\_\_

Save Form

MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
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1. (Name) Michigan Environmental Council
2. (Name) Citizens Utility Board of Michigan
3. (Name)
4. (Name)
5. (Name)
6. (Name)
7. (Name)

Name Holly L. Hillyer  
Address 420 E. Front Street  
  
City Traverse City State MI  
Zip 49686 Phone ( 231 ) 709-4000  
Email holly@tropospherelegal.com  
Date 11/20/2025

<input type="checkbox"/> I am not an attorney
<input checked="" type="checkbox"/> I am an attorney whose:
Michigan Bar # is P- <u>85318</u>
<u></u> Bar # is: <u></u>
( state )

Signature: \_\_\_\_\_

Save Form

STATE OF MICHIGAN  
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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Case No. U-21973

**Proof of Service**

On the date below, an electronic copy of **Petition to Intervene by Michigan Environmental Council and Citizens Utility Board of Michigan; and the Appearances of Christopher M. Bzdok and Holly L. Hillyer** was served on the following:

Name/Party	E-mail Address
<b>ALJ</b> Christopher S. Saunders	<a href="mailto:saundersc4@michigan.gov">saundersc4@michigan.gov</a>
<b>DTE Electric Company</b> Carlton D. Watson	<a href="mailto:mpscfilings_account@dteenergy.com">mpscfilings_account@dteenergy.com</a> <a href="mailto:carlton.watson@dteenergy.com">carlton.watson@dteenergy.com</a>
<b>Michigan Public Service Commission Staff</b> Anna B. Stirling Adam M. Cozort Heather M.S. Durian Michael Orris Lori Mayabb	<a href="mailto:stirlinga1@michigan.gov">stirlinga1@michigan.gov</a> <a href="mailto:cozorta1@michigan.gov">cozorta1@michigan.gov</a> <a href="mailto:durianh@michigan.gov">durianh@michigan.gov</a> <a href="mailto:orrism@michigan.gov">orrism@michigan.gov</a> <a href="mailto:mayabbl@michigan.gov">mayabbl@michigan.gov</a>

{signature on following page}

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

**Troposphere Legal, PLC**  
Counsel for MEC-CUB

Date: November 20, 2025

By: \_\_\_\_\_  
Natasha Fowles, Legal Assistant  
420 E. Front St.  
Traverse City, MI 49686  
Phone: 231-709-4000  
Email: [natasha@tropospherelegal.com](mailto:natasha@tropospherelegal.com)