



ENVIRONMENTAL LAW & POLICY CENTER

November 21, 2025

Ms. Lisa Felice
Michigan Public Service Commission
7109 W. Saginaw Hwy.
P. O. Box 30221
Lansing, MI 48909

RE: MPSC Case No. U-21985

Dear Ms. Felice:

The following is attached for paperless electronic filing:

Motion for Admission Pro Hac Vice of Bradley Klein

Motion for Admission Pro Hac Vice of Howard A. Learner

Proof of Service

Sincerely,

Daniel Abrams (P87696)
Environmental Law & Policy Center
dabrams@elpc.org

cc: Service List, Case No. U-21985

HQ: 35 East Wacker Drive | Suite 1600 | Chicago, IL 60601

ELPC.org | (312) 673-6500

Manny Flores, Chair | Howard A. Learner, Executive Director

Illinois | Indiana | Iowa | Michigan | Minnesota | North Dakota | Ohio | South Dakota | Wisconsin | Washington D.C.



**STATE OF MICHIGAN
MICHIGAN PUBLIC SERVICE COMMISSION**

In the matter of the application of Consumers)	Docket No. U-21985
Energy Company for approval of the sale of)	
its River Hydroelectric Generating Fleet,)	Administrative Law Judge
related Power Purchase Agreement, and other)	James M. Varchetti
relief.)	

MOTION FOR ADMISSION PRO HAC VICE OF BRADLEY KLEIN

Daniel Abrams (P87696) of the Environmental Law & Policy Center hereby moves that Bradley Klein of the Environmental Law & Policy Center be granted permission to participate in this case as co-counsel of record. In support of this Motion, the movant states as follows:

1. Rule 309(2) of the rules of practice and procedure for the Michigan Public Service

Commission (“MPSC” or “Commission”) states:

An attorney who is duly licensed to practice law in another state or in the courts of the United States may be permitted to practice before the Commission on the same basis as in the circuit courts in this State.

2. Rule 15, Section 2 of the rules concerning the State Bar of Michigan states:

Any person who is duly licensed to practice law in another state or territory, or in the District of Columbia, of the United States of America, or in any foreign country, may be permitted to engage in the trial of a specific case in a court or before an administrative tribunal in this state when associated with and on motion of an active member of the State Bar of Michigan who appears of record in the case. Such temporary permission may be revoked by the court summarily at any time for misconduct.

3. The movant is an active member in good standing of the State Bar of Michigan, and an attorney of record in this matter.
4. Bradley Klein is a managing attorney with the non-profit legal organization the Environmental Law & Policy Center with their primary office in Chicago, IL at:

Environmental Law & Policy Center
35 E. Wacker Drive, Suite 1600
Chicago, IL 60601
(312) 673-6500
bklein@elpc.org

5. Mr. Klein is licensed to practice and is a member in good standing in Illinois, Wisconsin, and New York.

WHEREFORE, I, Daniel Abrams, do hereby attest that I have read the affidavit of Bradley Klein. I have made a reasonable inquiry concerning the averments made therein and believe the out-of-state attorney's representations to be true. I hereby agree to ensure that the procedures of Michigan Court Rule 8.126 are followed and respectively request that Bradley Klein be admitted as co-counsel in Case Number U-21985.

Date: November 21, 2025

Respectfully Submitted,

By: /s/ Daniel Abrams
Daniel Abrams (P87696)
Environmental Law & Policy Center
35 E. Wacker Drive, Suite 1600
Chicago, IL 60601
(312) 673-6500
dabrams@elpc.org

**STATE OF MICHIGAN
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Energy Company for approval of the sale of)
its River Hydroelectric Generating Fleet,)
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relief.)

Docket No. U-21985

Administrative Law Judge
James M. Varchetti

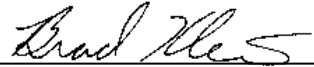
AFFIDAVIT OF BRADLEY KLEIN

I, Bradley Klein, being duly sworn, state the following:

1. I am an attorney currently licensed to practice law and in good standing in the following jurisdictions: Illinois, Wisconsin, and New York. My certificates of Good Standing are attached.
2. I have not sought a license to practice law in any other jurisdiction.
3. I am not disbarred or suspended in any jurisdiction.
4. I am not subject to any pending disciplinary action in any jurisdiction.
5. I have no disciplinary dispositions.
6. I am familiar with the Michigan Rules of Professional Conduct, Michigan Court Rules, and Michigan Rules of Evidence.
7. I have not appeared or practiced in any cases in Michigan within the past 365 days.

I hereby verify under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Respectfully submitted,



Bradley Klein
Managing Attorney
Environmental Law & Policy Center
35 East Wacker Drive, Suite 1600
Chicago, IL 60601



Attorney Registration and Disciplinary Commission
of the
Supreme Court of Illinois
www.iardc.org

One Prudential Plaza
130 East Randolph Drive, Suite
1500
Chicago, IL 60601-6219
(312) 565-2600 (800) 826-8625
Fax (312) 565-2320

3161 West White Oaks Drive
Suite 301
Springfield, IL 62704
(217) 522-6838 (800) 252-8048
Fax (217) 522-2417

Chicago
11/11/2025

Re: Bradley David Klein
Attorney No. 6291701

To Whom It May Concern:

The records of the Clerk of the Supreme Court of Illinois and this office reflect that Bradley David Klein was admitted to practice law in Illinois on 5/10/2007; is currently registered on the master roll of attorneys entitled to practice law in this state; has never been disciplined and is in good standing.

Very truly yours,
Lea S. Gutierrez
Administrator

By: 
Andrew Oliva
Registrar



*Appellate Division of the Supreme Court
of the State of New York
First Judicial Department*

I, Susanna M. Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, do hereby certify that

Bradley David Klein

was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on July 20, 2004, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Office of Court Administration, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand in the City of New York on November 13, 2025.



Susanna M. Rojas

Clerk of the Court



Samuel A. Christensen
Clerk

WISCONSIN SUPREME COURT

OFFICE OF THE CLERK

110 E. Main Street, Suite 215
P.O. Box 1688
Madison, WI 53701-1688

Telephone: 608-266-1880
TTY: 800-947-3529
Fax: 608-267-0640
<http://www.wicourts.gov>

CERTIFICATE OF GOOD STANDING

I, Sheelah Guild, Chief Deputy Clerk of the Supreme Court of Wisconsin certify that the records of this office show that:

BRADLEY DAVID KLEIN

was admitted to practice as an attorney within this state on February 13, 2007 and is presently in good standing in this court.

Dated: November 12, 2025

Sheelah Guild

SHEELAH GUILD
Chief Deputy Clerk of Supreme Court





State Bar of Michigan
306 Townsend St
Lansing, MI 48933
(517) 346-6377

Pro Hac Vice Application Receipt

Bradley Klein
35 E Wacker Dr Ste 1600
Chicago, IL 60601-2206
United States
bklein@elpc.org

Your Pro Hac Vice application has been successfully submitted. Please note: This confirmation does NOT constitute your temporary admission to the State Bar of Michigan.

Only the court, administrative tribunal, or arbitrator may enter an order allowing temporary admission. Once the order is entered, it is the foreign attorney's responsibility to file a copy of the order of admission within **seven (7) days** of entry to ProHacVice@michbar.org (mailto:ProHacVice@michbar.org), as required by MCR 8.126.

Credit card: *****4126

Payment Date: 11/21/2025

	Amount
Credit Card Transaction Fee	\$3.88
CPF-Pro Hac Vice	\$15.00
Pro Hac Vice	\$140.00
Total	\$158.88

This payment may be reversed if your bank or financial institution rejects the payment. If payment is rejected by your bank due to insufficient funds, you will be assessed a \$25 fee.

If you require additional assistance, contact ProHacVice@michbar.org (mailto:ProHacVice@michbar.org).

**STATE OF MICHIGAN
MICHIGAN PUBLIC SERVICE COMMISSION**

In the matter of the application of Consumers)
Energy Company for approval of the sale of)
its River Hydroelectric Generating Fleet,)
related Power Purchase Agreement, and other)
relief.)

Docket No. U-21985
Administrative Law Judge
James M. Varchetti

MOTION FOR ADMISSION PRO HAC VICE OF HOWARD A. LEARNER

Daniel Abrams (P87696) of the Environmental Law & Policy Center hereby moves that Howard A. Learner of the Environmental Law & Policy Center be granted permission to participate in this case as co-counsel of record. In support of this Motion, the movant states as follows:

1. Rule 309(2) of the rules of practice and procedure for the Michigan Public Service

Commission (“MPSC” or “Commission”) states:

An attorney who is duly licensed to practice law in another state or in the courts of the United States may be permitted to practice before the Commission on the same basis as in the circuit courts in this State.

2. Rule 15, Section 2 of the rules concerning the State Bar of Michigan states:

Any person who is duly licensed to practice law in another state or territory, or in the District of Columbia, of the United States of America, or in any foreign country, may be permitted to engage in the trial of a specific case in a court or before an administrative tribunal in this state when associated with and on motion of an active member of the State Bar of Michigan who appears of record in the case. Such temporary permission may be revoked by the court summarily at any time for misconduct.

3. The movant is an active member in good standing of the State Bar of Michigan, and an attorney of record in this matter.
4. Howard A. Learner is the Executive Director and CEO of the non-profit legal organization the Environmental Law & Policy Center with their primary office in Chicago, IL at:

Environmental Law & Policy Center
35 E. Wacker Drive, Suite 1600
Chicago, IL 60601
(312) 673-6500
hlearner@elpc.org

5. Mr. Learner is licensed to practice and is a member in good standing in the State of Illinois.

WHEREFORE, I, Daniel Abrams, do hereby attest that I have read the affidavit of Howard A. Learner. I have made a reasonable inquiry concerning the averments made therein and believe the out-of-state attorney's representations to be true. I hereby agree to ensure that the procedures of Michigan Court Rule 8.126 are followed and respectively request that Howard A. Learner be admitted as co-counsel in Case Number U-21985.

Date: November 21, 2025

Respectfully Submitted,

By: /s/ Daniel Abrams
Daniel Abrams (P87696)
Environmental Law & Policy Center
35 E. Wacker Drive, Suite 1600
Chicago, IL 60601
(312) 673-6500
dabrams@elpc.org

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Energy Company for approval of the sale of)
its River Hydroelectric Generating Fleet,)
related Power Purchase Agreement, and other)
relief.)

Docket No. U-21985
Administrative Law Judge
James M. Varchetti

AFFIDAVIT OF HOWARD A. LEARNER

I, Howard A. Learner, being duly sworn, state the following:

1. I am an attorney currently licensed to practice law and in good standing in the State of Illinois. My certificate of Good Standing is attached.
2. I have not sought a license to practice law in any other jurisdiction.
3. I am not disbarred or suspended in any jurisdiction.
4. I am not subject to any pending disciplinary action in any jurisdiction.
5. I have no disciplinary dispositions.
6. I am familiar with the Michigan Rules of Professional Conduct, Michigan Court Rules, and Michigan Rules of Evidence.
7. I have not appeared or practiced in any cases in Michigan within the past 365 days.

I hereby verify under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Respectfully submitted,

Howard A. Learner

Howard A. Learner
Executive Director & CEO
Environmental Law & Policy Center
35 East Wacker Drive, Suite 1600
Chicago, IL 60601



Attorney Registration and Disciplinary Commission
of the
Supreme Court of Illinois
www.iardc.org

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Fax (312) 565-2320

3161 West White Oaks Drive
Suite 301
Springfield, IL 62704
(217) 522-6838 (800) 252-8048
Fax (217) 522-2417

Chicago
11/13/2025

Re: Howard Alan Learner
Attorney No. 3127346

To Whom It May Concern:

The records of the Clerk of the Supreme Court of Illinois and this office reflect that Howard Alan Learner was admitted to practice law in Illinois on 10/29/1980; is currently registered on the master roll of attorneys entitled to practice law in this state; has never been disciplined and is in good standing.

Very truly yours,
Lea S. Gutierrez
Administrator

By: 
Andrew Oliva
Registrar



State Bar of Michigan
306 Townsend St
Lansing, MI 48933
(517) 346-6377

Pro Hac Vice Application Receipt

Howard Learner
35 E Wacker Dr Ste 1600
Chicago, IL 60601-2206
United States
HLearner@elpc.org

Your Pro Hac Vice application has been successfully submitted. Please note: This confirmation does NOT constitute your temporary admission to the State Bar of Michigan.

Only the court, administrative tribunal, or arbitrator may enter an order allowing temporary admission. Once the order is entered, it is the foreign attorney's responsibility to file a copy of the order of admission within **seven (7) days** of entry to ProHacVice@michbar.org (mailto:ProHacVice@michbar.org), as required by MCR 8.126.

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**STATE OF MICHIGAN
MICHIGAN PUBLIC SERVICE COMMISSION**

In the matter of the application of)
Consumers Energy Company for approval)
of the sale of its River Hydroelectric) Case No. U-21985
Generating Fleet, related Power Purchase)
Agreement, and other relief.)

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing *Motions for Admission Pro Hac Vice* were served by electronic mail upon the following Parties of Record, this Friday, November 21, 2025.

Administrative Law Judge Hon. James M. Varchetti	varchettij@michigan.gov
Consumers Energy Company Bret A. Totoraitis Kelly Hall Evan Keimach Melissa K. Harris Crystal L. Chacon	mpsc.filings@cmsenergy.com bret.totoraitis@cmsenergy.com kelly.hall@cmsenergy.com evan.keimach@cmsenergy.com melissa.harris@cmsenergy.com crystal.chacon@cmsenergy.com
Michigan Public Service Commission Staff Daniel E. Sonneveldt Amit T. Singh Lori Mayabb	sonneveldtd@michigan.gov singha9@michigan.gov mayabbl@michigan.gov
Michigan Environmental Council, Citizens Utility Board of Michigan, Natural Resources Defense Council Christopher M. Bzdok Natasha Fowles	chris@tropospherelegal.com natasha@tropospherelegal.com

<p>Michigan Trout Unlimited, Michigan Steelhead and Salmon Fishermen's Association, Anglers of The Au Sable, and the Michigan Hydro Relicensing Coalition Daniel Abrams Katherine S. Duckworth Bradley Klein Robert Kelter Howard Learner Alondra Estrada Katie Toolan</p>	<p>dabrams@elpc.org kduckworth@elpc.org bklein@elpc.org rkelter@elpc.org hlearner@elpc.org astrada@elpc.org ktoolan@elpc.org stuberbob@gmail.com bryanburroughs@michigantu.org dpeterson6325@gmail.com deneade@charter.net tombaird51@gmail.com</p>
<p>Association of Businesses Advocating Tariff Equity Michael Pattwell Stephen A. Campbell</p>	<p>mpattwell@clarkhill.com scampbell@clarkhill.com</p>
<p>Lake Allegan Association, Inc and Carol Doeringer Caroline S. Soodek</p>	<p>coco@seasongoodlaw.com</p>
<p>Grand Traverse Band of Ottawa and Chippewa Indians (GTB) William Rastetter</p>	<p>bill@envlaw.com karla@envlaw.com</p>
<p>Confluence Hydro, LLC Laura A. Chappelle Timothy J. Lundgren Justin K. Ooms</p>	<p>lachappelle@varnumlaw.com tjlundgren@varnumlaw.com jkooms@varnumlaw.com</p>
<p>Michigan Department of Natural Resources Department of Attorney General Celeste R. Gill Nathan Gambill</p>	<p>gillc@michigan.gov gambilln@michigan.gov</p>



Daniel Abrams
Environmental Law & Policy Center
dabrams@elpc.org