

VARNUM

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December 3, 2025

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

Re: MPSC Case No. U-21973

Dear Ms. Felice:

Attached for electronic filing in the above-captioned matter, please find the Petition for Leave to Intervene on behalf of Billerud Americas Corporation, as well as a Proof of Service regarding same.

Thank you for your assistance in this matter.

Sincerely yours,

VARNUM



Timothy J. Lundgren

TJL/lml
Enclosures

c: All parties of record.

28315605

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

PETITION FOR LEAVE TO INTERVENE

OF BILLERUD AMERICAS CORPORATION

Billerud Americas Corporation ("Billerud") by and through its counsel, Varnum, LLP, hereby files this Petition with the Michigan Public Service Commission ("MPSC" or "Commission") for leave to intervene in and become a party to the above-titled proceedings pursuant to R 792.10410 ("Rule 410") of the Commission's Rules of Practice and Procedure and the Michigan Administrative Procedures Act, MCL § 24.101 *et seq.* In support of this Petition, Billerud states as follows:

1. Billerud owns and operates two mills in the Upper Peninsula of Michigan. Billerud is a gas transportation customer of DTE Gas Company ("DTE").
2. Billerud (or its predecessor Verso) has participated in several recent DTE general gas rate cases including U-20642, U-20940, and U-21291, in which the current rates and charges were approved.
3. On November 13, 2025, DTE filed an application with associated testimony and exhibits proposing revised rate structures, amended rate schedules, and rules governing the distribution and supply of natural gas. ("Application").

4. Attachment 2 to the Application shows that DTE is requesting an increase in the total transportation services rate of 31.52%. Billerud would be subject to this cost increase if it were to be approved in this proceeding.

5. The Commission has long recognized a two-prong test for standing of right that requires a prospective intervenor to show (i) that it will suffer an injury in fact, and (ii) that the interests allegedly endangered are within the zone of interests to be protected or regulated by the statute or constitutional guarantee in question. See, *In re Application of The Detroit Edison Co for Authority to Increase its Rates*, Case Nos. U-15768 and U-15751 (January 11, 2010); *Association of Data Processing Service Organizations, Inc v Camp*, 397 US 150; 90 S Ct 827; 25 L Ed 2d 184 (1970); and *Drake v The Detroit Edison Company*, 453 F Supp 1123, 1127 (WD Mich, 1978).

6. Billerud will be directly and adversely affected by these proceedings because DTE has proposed substantial rate increases for the services that Billerud receives. As a utility customer with Michigan facilities, Billerud is also within the zone of interest protected by the statutes under which this case has been brought. Billerud therefore satisfies the Commission's two-pronged test.

7. Billerud intends to participate in these proceedings to the extent necessary to protect the interests of its Upper Peninsula Michigan mills and intends to take the position that any charges to DTE gas customers must be just, reasonable, and consistent with costs of service. Billerud intends to examine the proposed XLT and XXLT rate changes to ensure that Billerud and other customers are not being required to improperly subsidize costs.

8. The interests of Billerud in this proceeding cannot be adequately represented or protected by any other party.

9. Billerud reserves the right to take other positions and/or seek other relief based on a review of the various filings, the responses to discovery, or positions taken by DTE or other parties in this proceeding.

WHEREFORE, Billerud respectfully requests that the Commission:

- a. Grant Billerud's Petition for Leave to Intervene; and
- b. Grant such other and further relief as is deemed lawful and appropriate.

Respectfully submitted,

Varnum, LLP
Attorneys for Billerud Americas Corporation

**Timothy J.
Lundgren**

Digitally signed by: Timothy J.
Lundgren
DN: CN = Timothy J. Lundgren email
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Date: 2025.12.03 09:17:17 -05'00'

December 3, 2025

By: _____

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Case No. U-21973

PROOF OF SERVICE

STATE OF MICHIGAN)
) ss.
COUNTY OF KENT)

Lydia M. Lubbers, the undersigned, being first duly sworn, deposes and says that she is a Legal Secretary at VARNUM LLP and that on Wednesday, December 3, 2025, she served a copy of the Petition for Leave to Intervene on behalf of Billerud Americas Corporation, and this Proof of Service upon those individuals listed on the attached Service List via email.

Lydia M.
Lubbers

Digitally signed by: Lydia M. Lubbers
DN: CN = Lydia M. Lubbers email
= lmlubbers@varnumlaw.com C
= US
Date: 2025.12.03 09:17:33 -05'00'

Lydia M. Lubbers

<p>ADMINISTRATIVE LAW JUDGE Honorable Christopher S. Saunders saundersc4@michigan.gov</p> <p>DTE GAS COMPANY Carlton D. Watson Estella R. Branson carlton.watson@dteenergy.com estella.branson@dteenergy.com mpscfilings_account@dteenergy.com</p> <p>MPSC STAFF Michael J. Orris Lori Mayabb Heather M.S. Durian Anna B. Stirling Adam M. Cozort orrism@michigan.gov mayabbl@michigan.gov durianh@michigan.gov stirlinga1@michigan.gov cozorta1@michigan.gov</p> <p>MICHIGAN ENVIRONMENTAL COUNCIL Christopher M. Bzdok chris@tropospherelegal.com</p>	<p>ENERGY MICHIGAN</p> <p>BILLERUD Laura A. Chappelle Timothy J. Lundgren Justin K. Ooms lachappelle@varnumlaw.com tjlundgren@varnumlaw.com jkooms@varnumlaw.com</p> <p>DEPARTMENT OF ATTORNEY GENERAL Lucas Wollenzien Joel B. King wollenzienl@michigan.gov kingj38@michigan.gov</p> <p>DETROIT THERMAL, LLC Arthur J. Levasseur levasseur@fischerfranklin.com</p> <p>RETAIL ENERGY SUPPLY ASSOCIATION Jennifer U. Heston jheston@potomacclaw.com</p>
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