

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of  
**DTE ELECTRIC COMPANY**  
for approval of special contracts  
and related relief

Case No. U-22058

**PETITION TO INTERVENE OF THE  
GREAT LAKES RENEWABLE ENERGY ASSOCIATION**

The Great Lakes Renewable Energy Association (“GLREA”), by and through its counsel, Public Law Resource Center PLLC, files this Petition to Intervene of the Great Lakes Renewable Energy Association in the above-captioned proceeding, pursuant to Rule 410 of the Michigan Administrative Hearing System’s Administrative Hearing Rules, 2015 AC, R792.10401 *et seq*, and such other statutory and Commission Rule provisions that may be applicable. In support of this Petition, GLREA states:

1. GLREA is a nonprofit organization established in 1991. GLREA’s membership includes hundreds of individual members who are electric customers of several Michigan utilities, including DTE Electric Company (DTE), that have a direct interest in promoting just and reasonable rates and cost minimization through the use of more efficient and diverse energy sources. GLREA, and its members, are directly affected by and interested in the rates, terms and conditions, and policies governing the provision of electric energy by DTE to its members and the general public.

2. GLREA meets the statutory and agency rule criteria for being granted intervention in this proceeding. Section 6a(1), MCL 460.6a(1), states in relevant part:

Sec. 6a. (1) A gas utility, electric utility, or steam utility shall not increase its rates and charges or alter, change, or amend any rate or rate schedules, the effect

of which will be to increase the cost of services to its customers, without first receiving commission approval as provided in this section.... The commission shall require notice to be given to all interested parties within the service area to be affected, and all interested parties shall have a reasonable opportunity for a full and complete hearing....

Rule 402(e), (f), and (g), R 792.10402(e), (f), and (g) state in relevant part:

(e) "Intervenor" means one permitted to intervene in a proceeding pursuant to these rules.

(f) "Party" means a person by or against whom a proceeding is commenced or a person who is permitted to intervene, a person who protests an application for motor carrier authority, or the staff of the commission in any proceeding in which the staff participates. Parties to a proceeding shall designate themselves as applicants, complainants, intervenors, respondents, protestants, or staff according to the nature of the proceeding and the relationship of the parties.

(g) "Person" means any of the following entities:

(i) A natural person.

(ii) Corporation.

\* \* \*

(v) Body politic.

\* \* \*

(vii) Association.

The Commission's Notice of Hearing in this case also states in part:

"Any person wishing to intervene and become a party to the case shall electronically file a petition to intervene with this Commission by April 9, 2026."

The GLREA is both a non-profit corporation and a group association representing its members (or persons) who are electric customers of DTE Electric. The Commission has traditionally recognized that customers, or an association representing a customer or customers, have standing to intervene in utility rate proceedings, and as such, constitute "interested persons" or "a party" who are affected by the utility's application for a rate increase in this case. The GLREA fully meets these requirements.

3. GLREA asserts that it qualifies to intervene in this case by right, and in addition, pursuant to permissive intervention. Besides having individual members who are direct

customers of DTE, GLREA's membership also includes small companies which directly assist customers in installing and maintaining solar facilities in DTE's service territory and in reducing their energy costs. GLREA also has a unique perspective given its "hands on" grass roots experience in implementing renewable energy resources for utility customers, a unique background compared to other potential intervenor parties.

4. The GLREA and its member customers also meet the two-prong test commonly utilized by the Commission to determine standing as set forth in *Drake v The Detroit Edison Co*, 453 F Supp 1123 (WD Mich, 1978), and *Association of Data Processing Service Organizations, Inc v Camp*, 397 US 150; 90 S Ct 827; 250 L Ed 184 (1970) involving a showing that (1) the petitioner would likely suffer injury in fact (i.e., its interests are impacted or affected) and (2) the petitioner's affected interests are within the zone of interest to be protected or regulated by the statutes involved (i.e. the ratemaking statutes applicable herein). The GLREA and its member customers served by DTE have a direct interest in the rates, terms and conditions applicable to electric service provided by DTE, which matters are or may be affected by this case. These interests are within the zone of interest to be addressed and protected by these Commission proceedings.

5. In addition to meeting the tests for intervention by right under the Commission's Rules, the GLREA and its residential member customers, cooperating and aligned as a group, also meet the tests for being granted permissive intervention. The residential electric customers participating in the GLREA as intervenors in this case have a unique perspective and useful information to provide the Commission concerning the issues to be addressed in this proceeding.

6. GLREA has been granted intervention in numerous past or pending Commission cases including PSCR Plan and forecast cases, electric rate cases, PURPA cases, Renewable Energy Plan cases, VGP cases, Integrated Resource Plan cases, and numerous other cases,

including DTE Case U-21990, a recent case involving DTE's special contracts associated with the proposed Saline Michigan data center. The GLREA has been granted intervention in all of the scores of cases in which it has sought intervention, including Case U-17317 wherein the ALJ, and the Commission in its Order dated March 6, 2014, ruled that GLREA qualified for intervention by right.

7. GLREA also asserts that GLREA and its members are not adequately represented by any other party and that the grant of this petition to intervene is in the public interest. State employees from the Attorney General and the MPSC Staff are not permitted to represent the interests of private parties, and none of the other parties can adequately represent GLREA's interests.

8. The GLREA reserves the right to participate in all legal and factual issues relating to DTE's rate filing in this case. The specific issues and evidence to be presented must necessarily be further developed based upon a thorough review of DTE's evidentiary filing by counsel and expert consultants. However, preliminarily, DTE's Application and case filing raises several cost, rate and accounting issues which deserve close scrutiny by the parties and the Commission, including but not limited to all issues summarized in the Commission's Notice of Hearing. All of these issues are directly relevant to ensuring that DTE's proposed entry into the subject contracts is reasonable and prudent, and to ensure that DTE's other customers are not adversely affected, directly or indirectly, by this case with respect to reliability of service and the maintenance of just and reasonable rates. The issues in this case thus directly affect GLREA and its member customers.

WHEREFORE, GLREA respectfully requests that the Administrative Law Judge and Commission grant GLREA's Petition to Intervene as a full party in these Commission proceedings, and grant GLREA such further and consistent relief that is lawful and reasonable.

Respectfully submitted,

**Don L. Keskey**

Don L. Keskey (P23003)

Brian W. Coyer (P40809)

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Dated: April 8, 2026

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 Electric Company Docket No. U-22058

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

1. (Name) Great Lakes Renewable Energy Association
2. (Name)
3. (Name)
4. (Name)
5. (Name)
6. (Name)
7. (Name)

Name Don L. Keskey  
Address University Office Place  
333 Albert Avenue, Suite 425  
City East Lansing State MI  
Zip 48823 Phone ( 517 ) 999-7572  
Email donkeskey@publiclawresourcecenter.com  
Date April 8, 2026

<input type="checkbox"/> I am not an attorney
<input checked="" type="checkbox"/> I am an attorney whose:
Michigan Bar # is P- <u>23003</u>
_____ Bar # is: _____
( state )

Signature: Don L. Keskey Digitally signed by Don L. Keskey  
Date: 2026.04.08 14:07:33 -04'00'

MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
PUBLIC SERVICE COMMISSION

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1. (Name) Great Lakes Renewable Energy Association
2. (Name)
3. (Name)
4. (Name)
5. (Name)
6. (Name)
7. (Name)

Name Brian W. Coyer  
Address University Office Place  
333 Albert Avenue, Suite 425  
City East Lansing State MI  
Zip 48823 Phone ( 517 ) 999-7572  
Email bwcoyer@publiclawresourcecenter.com  
Date April 8, 2026

<input type="checkbox"/> I am not an attorney
<input checked="" type="checkbox"/> I am an attorney whose:
Michigan Bar # is P- <u>40809</u>
_____ Bar # is: _____
( state )

Signature: Brian W. Coyer Digitally signed by Brian W. Coyer  
Date: 2026.04.08 14:05:57 -04'00'

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**PROOF OF SERVICE**

Carol A. Dane says that on **April 8, 2026**, she served a copy of **Petition to Intervene on behalf of the Great Lakes Renewable Energy Association and Appearance of Don L. Keskey and Brian W. Coyer** upon the following parties via email:

Name/Party	E-mail Address
<b>ADMINISTRATIVE LAW JUDGE</b> Honorable Theresa A. G. Staley	staley1@michigan.gov
<b>DTE ELECTRIC COMPANY</b> Andrea E. Hayden John Janiszewski	mpscfilings@dteenergy.com andrea.hayden@dteenergy.com john.janiszewski@dteenergy.com
<b>MICHIGAN PUBLIC SERVICE COMMISSION STAFF</b> Daniel E. Sonneveldt Amit T. Singh Adam M. Cozort	sonneveldtd@michigan.gov singha9@michigan.gov cozort1@michigan.gov
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<b>MICHIGAN ENVIRONMENTAL COUNCIL, NATURAL RESOURCES DEFENSE COUNCIL, SIERRA CLUB, CITIZENS UTILITY BOARD</b> Christopher M. Bzdok T.J. Andrews Natasha Fowles Sue Fruchey	chris@tropospherelegal.com tjandrews@tropospherelegal.com natasha@tropospherelegal.com sue@tropospherelegala.com

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

PUBLIC LAW RESOURCE CENTER PLLC

*Carol Dane*

Carol A. Dane

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Dated: April 8, 2026