

**Bloom Sluggett, PC**  
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April 17, 2026

Ms. Lisa Felice  
Executive Secretary  
Michigan Public Service Commission  
7109 W. Saginaw Highway  
Lansing, MI 48917

*Re: MPSC Case No. U-22071: In the matter of the application of SILVER MAPLE PV, LLC for a Renewable Energy or Storage Siting Certificate to construct a solar energy facility.*

Dear Executive Secretary:

Please accept the enclosed of Zeeland Charter Township's *Petition to Intervene* and *Proof of Service* for filing in the above-mentioned matter.

Sincerely,

*/s/ Patrick Sweeney*

Patrick Sweeney  
David M. Eberle  
Nathan D. Inks  
Micheal J. Watza  
*Counsel for Zeeland Charter Township*

cc: w/enclosures: Parties of Record

STATE OF MICHIGAN  
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter of the application of	)	
SILVER MAPLE PV, LLC for a	)	Case No. U-22071
Renewable Energy or Storage Siting	)	
Certificate to construct a solar energy	)	
facility	)	
_____	)	

**ZEELAND CHARTER TOWNSHIP’S PETITION TO INTERVENE**

Zeeland Charter Township, Ottawa County, Michigan (the “Township”), by and through its attorneys, Bloom Sluggett, PC, petitions the Michigan Public Service Commission (the “Commission”) for leave to intervene in the above-captioned proceeding pursuant to Public Act 233 of 2023 (“PA 233”) and Rule 792.10410 of the Michigan Administrative Code (“Rule 410”).

The Township states as follows in support of its petition:

1. The Township is located in Ottawa County, Michigan.
2. The Township has approximately 12,137 residents who reside within its boundaries.
3. On April 3, 2026, Silver Maple PV, LLC filed the present application, seeking a Renewable Energy or Storage Siting Certificate for an approximately 200 megawatt (“MW”) solar energy facility to be located within the Township, sited on approximately 1,127 acres of fenced-in area and approximately 1,914 acres of total participating land, of which 1,431 acres will be disturbed (the “Project”).
4. Under Section 226(3) of PA 233, MCL 460.1226(3), an “affected local unit” is explicitly authorized to intervene as a third party in such a proceeding as a matter of right. An “affected local unit” is defined as a “unit of local government in which all or part of a proposed energy facility will be located.” MCL 460.1221(a).

5. Because part of the participating land within the Project is located within the Township, the Township is an “affected local unit” and is statutorily authorized to intervene in this matter as of right. Specifically, more than half of the Project is proposed to be located in the Township.

6. The Township exercises zoning jurisdiction within its geographic boundaries, and so it consequently qualifies as an affected local unit as described in the Commission’s October 10, 2024 Order in Case No. U-21547.

7. As recognized in PA 233, utility-scale solar installations within an “affected local unit” can impact, among other things: (1) the environment and natural resources, (MCL 460.1225(1)(f)); (2) public health and safety, (MCL 460.1225(1)(g)); (3) signal interference, (MCL 460.1225(1)(o)); (4) stormwater patterns, (MCL 460.1225(1)(p)); (5) municipal fire protection and emergency response resources, (MCL 460.1225(1)(p)); (6) future land use as it relates to project decommissioning, (MCL 460.1225(1)(r)); (7) local land use, including the use and preservation of prime farmland, (MCL 460.1226(6)); and (8) sound nuisances, (MCL 460.1226(8)(a)(iv)). The Township is charged with protecting the interests of its residents, including their health and safety. MCL 460.1225(1)(g). Because it is an affected local unit, the Township has the right to intervene in this matter.

8. Apart from the intervention right guaranteed by PA 233, the Township also satisfies the Commission’s test for standing. The Commission has indicated that it considers the ability to intervene to be a matter of right when a petitioner meets a 2-prong test determining standing. *Ass’n of Data Processing Serv Orgs, Inc v Camp*, 397 US 150 (1970), applied by the Commission in its November 10, 1988, Order in Case No. U-9138. The Commission’s test for standing requires that an intervenor show (1) that the intervenor will suffer an injury in fact as a result of the outcome of the case and (2) that the interests of the intervenor allegedly endangered fall within the zone of

interests intended to be protected or regulated by the statute in question. *In re Consumers Energy for Authority to Implement a Power Supply Cost Recovery Plan*, MPSC Case No. U-17317, March 6, 2014, Order, p 4.

9. Regarding the first prong of the standing test, the Project impacts the Township's interests, and those interests will be harmed if the siting certificate is granted. If the requested siting certificate is granted, the Project will be constructed and operated within the geographic boundaries of the Township, and the Township's residents will be subjected to the detriments and injuries identified in MCL 460.1225 and MCL 460.1226.

10. Regarding the second prong of the standing test, the Township's interests fall within the zone of interests intended to be protected or regulated by PA 233. Several provisions of PA 233 are specifically designed to mitigate or protect against adverse impacts or nuisances created by utility-scale renewable energy projects. For example, MCL 460.1226 allows the Commission, when evaluating the application for a siting certificate, to consider "feasible alternative developed locations," "the impact of the proposed facility on local land use," whether the applicant has sufficiently considered and addressed "impacts to the environment and natural resources," whether "the proposed benefits of the proposed energy facility justify its construction," whether the Project will "unreasonably diminish farmland," and whether the Project will "present an unreasonable threat to public health or safety." The Township has an interest in these criteria and in ensuring that the Commission's review of this application adequately and fully considers those criteria.

11. Additionally, the Township also meets the Commission's criteria for permissive intervention. "[T]he Commission's discretion to grant leave to intervene is broader than the two-prong [standing] test. Unlike a court of law, an administrative agency can allow intervention whenever the resulting delay will likely be outweighed by the benefit of the intervenor's participation." *In re Michigan Consolidated for Authority to Increase its Rates*, MPSC Case No.

U-10150, December 8, 1992, Order, p 5. Permissive intervention has been granted when the proceeding “raises novel questions and important issues of policy” and the intervenor will “bring a unique perspective to the case.” *In re Consumers Energy Company to Fully Comply with Public Act 295 of 2008*, MPSC Case No. U-17771, October 27, 2015, Order, p 6 (citation omitted).

12. The Township possesses useful and unique information and perspectives that it will provide to the Commission throughout the duration of this case, including about the area within the Township where the Project is proposed to be developed, and the interests and objections of its residents. The Township’s information and perspective will assist the Commission in making significant policy determinations and will “bring helpful information to the Commission’s attention that might not otherwise be available.” *In re DTE Electric Company to Fully Comply with the Public Utility Regulatory Policies Act of 1978*, MPSC Case No. U-18091, February 21, 2019, Order, p 9. The Township therefore meets the Commission’s criteria for permissive intervention.

13. The Township will carefully examine Silver Maple Valley PV, LLC’s application and supporting records and testimony, and it will evaluate the application’s reasonableness, prudence, and the accuracy and reliability of the representations made within the application and supporting records and testimony.

14. The unique interests of the Township are not adequately represented by any other party. Accordingly, it would be detrimental to the public interest to deny this Petition to Intervene.

15. The Township’s Petition to Intervene is timely filed because it is being filed at least 7 days prior to any Prehearing Conference in this matter per Michigan Administrative Code, Rule 792.10410(1).

**Relief Requested**

WHEREFORE, Zeeland Charter Township requests that the Commission grant its Petition to Intervene in these proceedings and that the Township be made a full party to these proceedings.

April 17, 2026

Respectfully submitted by,

BLOOM SLUGGETT, PC  
*Attorneys for Zeeland Charter Township*

*/s/ Patrick Sweeney* \_\_\_\_\_  
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STATE OF MICHIGAN  
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	)	

**PROOF OF SERVICE**

Tonya Voakes, being first duly sworn, deposes and says that she is employed by Bloom Sluggett, PC, and that on April 17, 2026, she served Zeeland Charter Township’s *Petition to Intervene* and *Proof of Service* on behalf of **Zeeland Charter Township**, upon those individuals listed in the below service list.

/s/ Tonya Voakes  
Tonya Voakes

**SERVICE LIST – CASE NO. U-22071**

<b>Party</b>	<b>Email Address</b>
<b>Administrative Law Judge</b>	
Hon. James M. Varchetti	varchettij@michigan.gov
<b>Counsel for Silver Maple PV, LLC</b>	
Salina M. Hamilton	shamilton@dickinsonwright.com
Ryan M. Shannon	rshannon@dickinsonwright.com
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<b>Counsel for the Michigan Public Service Commission Staff</b>	
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<b>Intervenors</b>	
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Nicholas Driesenga	driesengaoutdoor@gmail.com
Valerie Driesenga	valeriedriesenga@gmail.com
Erin VanderMeulen	erinvandermeulen@yahoo.com
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