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November 6, 2007

**Via E-Docket**

Ms. Mary Jo. Kunkle  
Executive Secretary  
Michigan Public Service Commission  
6545 Mercantile Way  
Lansing, MI 48911

**Re: In the matter of the application of Consumers Energy Company for authority to increase its rates for the generation and distribution of electricity and for other relief.  
MPSC Case No. U-15245**

Dear Ms. Kunkle:

Enclosed for filing in the above-referenced case is the *Direct Testimony of Ross C. Hemphill on Behalf of Constellation NewEnergy, Inc.*, and *Proof of Service*.

If you have any questions, please contact me.

Very truly yours,

John M. Dempsey

JMD:jkt  
Enclosures

LANSING 34885-1 390453v4

C o u n s e l l o r s   A t   L a w

DETROIT   BLOOMFIELD HILLS   LANSING   GRAND RAPIDS   ANN ARBOR  
WASHINGTON, D.C.

**STATE OF MICHIGAN**

**BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

In the matter of the application of )  
CONSUMERS ENERGY COMPANY )  
for authority to increase its rates for the )  
generation and distribution of electricity and )  
for other relief. )  
\_\_\_\_\_ )

Case No. U-15245

**DIRECT TESTIMONY OF**

**ROSS C. HEMPHILL**

**ON BEHALF OF CONSTELLATION NEWENERGY, INC.**

Dated: November 6, 2007

1 **I. INTRODUCTION**

2

3 **Q1. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND CURRENT**  
4 **POSITION.**

5 A1. My name is Ross C. Hemphill. I am a Principal Consultant with Freeman, Sullivan &  
6 Co., whose main office is located on the 15<sup>th</sup> floor of 101 Montgomery Street, San  
7 Francisco, California 94104.

8

9 **Q2. PLEASE DESCRIBE YOUR ACADEMIC BACKGROUND.**

10 A2. I received a Ph.D. in Resource Economics through what is now called the Department of  
11 Agricultural, Environmental, and Development Economics (AED) at The Ohio State  
12 University (OSU). I also have an M.S. in Economics from Indiana State University and a  
13 B.A. in Economics from Lewis University.

14

15 **Q3. PLEASE DESCRIBE YOUR WORK EXPERIENCE PERTINENT TO THIS**  
16 **PROCEEDING.**

17 A3. I have been working in various aspects of utility economics, regulatory policy, and  
18 energy research for almost 30 years. I started my career performing valuation and  
19 depreciation studies for General Telephone Company of Indiana. Following this, I was  
20 on the staff with the Illinois Commerce Commission. I was then hired by American  
21 Electric Power Service Corporation to perform cost of service and rate design analyses.  
22 At that point, I decided to pursue the doctoral degree at OSU and accepted a graduate  
23 research assistant position with the National Regulatory Research Institute (NRRI),

1 where I performed studies and co-authored several reports. After that, I accepted an  
2 economist position with Argonne National Laboratory, where I was project manager over  
3 energy research endeavors and was Section Manager of Economics and Law for a  
4 number of years. I then accepted the position of Director of Electric Pricing with Niagara  
5 Mohawk Power Corporation. After leaving Niagara Mohawk, I have been consulting in  
6 the utility industry. My CV is attached to this testimony.

7  
8 **Q4. ON WHOSE BEHALF ARE YOU PRESENTING THIS TESTIMONY?**

9 A4. On behalf of Constellation NewEnergy, Inc.

10  
11 **Q5. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

12 A5. In my testimony, I will illustrate and discuss some of the problems with Consumers'  
13 proposal that an Educational Institution provision (GEI) be included in its proposed Rates  
14 GS, GSD, GP, and GPD.

15  
16 **Q6. ARE YOU SPONSORING ANY EXHIBITS IN CONNECTION WITH YOUR  
17 TESTIMONY?**

18 A6. I am sponsoring just one exhibit. Exhibit CNE-1 (RH-1) is a copy of my curriculum  
19 vitae.

20

1 **II. GENERAL EDUCATIONAL INSTITUTION PROVISION**

2

3 **Q7. PLEASE DESCRIBE CONSUMERS' PROPOSAL FOR AN EDUCATIONAL**  
4 **INSTITUTION PROVISION TO BE INCLUDED IN ITS PROPOSED RATES GS,**  
5 **GSD, GP, AND GPD.**

6 A7. Consumers is proposing to implement an additional discount for all educational facilities  
7 taking service under general service tariffs. Consumers alleges that such a credit is  
8 warranted by the “difference between the average costs per unit of the customers within  
9 the general rate class and that of the corresponding educational institutions shown in the  
10 cost study.” (Miller, Dir. at 40, lines 16-18)

11

12 **Q8. ARE THERE ANY PROBLEMS WITH THIS PROPOSAL?**

13 A8. Yes. Consumers is proposing a seasonal energy differential based on marginal cost  
14 principles. (*Id.* at 46-47) Yet it is proposing an additional energy discount per its  
15 proposed GEI provision that is based on results of its embedded cost study. (*Id.* at 40)  
16 Embedded costs and marginal costs are two different concepts that cannot be reconciled  
17 in this case and, therefore, there is no way for the Commission to know exactly what  
18 basis it is setting rates upon under Consumers’ proposal. In addition, the energy (and  
19 capacity) spread based on marginal cost principles (i.e., market prices) should already  
20 reflect any differences in costs to serve these educational institutions based on their load  
21 characteristics.

22

1 **Q9. WOULD YOU PLEASE EXPLAIN WHY COMBINING THE EMBEDDED COST**  
2 **CREDIT WITH THE MARGINAL COST ENERGY SPREAD IS**  
3 **INAPPROPRIATE IN THIS CASE?**

4 A9. The embedded cost credit is an artifact of the averaging process in an embedded cost  
5 study (presumably this is why Mr. Miller calls this process “obsolete”). Within any  
6 customer class, there will be customers with costs above the average for the class and  
7 other customers with costs below the average for the class. One could find a subset of the  
8 customers with below average costs and illustrate the same effect that Consumers has  
9 illustrated for the educational institutions. However, Consumers has recognized, quite  
10 correctly, that marginal cost principles can be useful in setting energy rates and has used  
11 these costs (i.e., market prices) to reallocate the cost burden between different times of  
12 the year. The marginal cost energy spread, in effect, takes into account any variation in  
13 cost characteristics related to energy (and capacity) costs between different customers  
14 within the same customer class.

15  
16 **Q10. DOES THIS MEAN THAT THERE SHOULD ONLY BE ONE CUSTOMER**  
17 **CLASS?**

18 A10. No. It is appropriate to separate customers based on differences in cost characteristics.  
19 For example, customers that use less of the distribution system should not have to pay for  
20 costs that they did not cause the utility to incur. However, in this case, Consumers is  
21 proposing to shrink the number of customer classes. (Miller, Dir, at 5-6)

22

1 **Q11. CAN YOU ILLUSTRATE THE PROBLEM THAT CONSUMERS CREATES BY**  
2 **USING AN EMBEDDED COST APPROACH TO SET THE CREDIT FOR THE**  
3 **GEI?**

4 A11. A simple example will illustrate the problem. Suppose there are two buildings sitting  
5 across a street from each other. One is a closed high school that is now used as a  
6 warehouse, and one is the new high school that replaced the old high school.  
7 Presumably, these two buildings are taking delivery services from substantially the same  
8 delivery assets and, therefore, there is no cost reason to differentiate the delivery rates.  
9 From a marginal cost perspective, it costs no more or no less to provide the energy  
10 commodity to each of these buildings in any given hour. Yet Consumers is requesting  
11 that the school be sent a price signal that suggests it is somehow cheaper to produce a  
12 kWh of energy when it is being used for educational purposes as opposed to some other  
13 purpose. This is simply a fiction.

14

15 **Q12. BECAUSE SCHOOLS OFTEN DO NOT OPERATE DURING PEAK PERIODS**  
16 **(E.G., LATE AFTERNOON OR IN THE SUMMER), SHOULD THESE**  
17 **CUSTOMERS BE SENT A SIGNAL THAT IT IS CHEAPER TO PRODUCE**  
18 **ELECTRICITY DURING THOSE TIMES?**

19 A12. If indeed a particular school does operate more in off-peak periods, Consumers' seasonal  
20 energy rates will reflect the lower cost to produce in those periods, and the customer will  
21 see a lower average rate. Again, going back to the example of the warehouse and the  
22 high school, if both of these customers consume the same amount of energy over the

1 entire year, but the school consumes that energy largely in off-peak periods and the  
2 warehouse consumes more evenly, the school will see a lower average rate than the  
3 warehouse. As an aside, I would argue that there has been no evidence presented, with  
4 the exception of the cost study which aggregates data at the customer class level, to  
5 indicate what level of energy each of these schools consumes in the off-peak periods. It  
6 seems unlikely that all of these schools have the same load curves. The GEI includes  
7 universities and colleges, as well as high schools and elementary schools. Each of these  
8 different schools may operate very differently from one another. For example, colleges  
9 tend to have classes year round, at night, and on weekends, not to mention the  
10 extracurricular activities. The same may be true for many high schools. Nevertheless,  
11 under Consumers' seasonal rate differential, we do not need to know whether a particular  
12 school is consuming on-peak or off-peak; the tariff sends the price signal to each  
13 customer based on its own consumption patterns. The same is true for those customers  
14 on demand rates.

15  
16 **Q13. WHAT DO YOU RECOMMEND?**

17 A13. The GEI clause is unnecessary and creates tariffs that are less transparent with respect to  
18 cost causation and more complicated and confusing for customers to understand. This is  
19 in direct conflict with Consumers' stated intentions for rate design. (Miller, Dir. at 5, Ins.  
20 13-18) To the extent that educational facilities are cheaper to serve, this is reflected in  
21 the seasonal variation in tariff rates.

1 **Q14. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY IN THIS CASE?**

2 A14. Yes.

3  
4

ANNARBOR 34885-1 93344v2



**Ross C. Hemphill**  
*Principal Consultant*

**EDUCATION**

Ph.D. Resource Economics, The Ohio State University (1988)  
M.S. Economics, Indiana State University (1978)  
B.A. Business Economics, Lewis University (1977)

**EMPLOYMENT HISTORY**

2007 –Present Principal Consultant, Freeman, Sullivan & Co., San Francisco  
2005-2007 Vice President, NERA Economic Consulting  
1999-2005 Vice President, Laurits R. Christensen Associates, Inc.  
1998-1999 Senior Economist, Principal, Laurits R. Christensen Associates, Inc.  
1997-1998 Principal, AXS Marketing LLC  
1996-1997 Director of Resource Strategies, Niagara Mohawk Power Corporation  
1993-1996 Director of Electric Pricing, Niagara Mohawk Power Corporation  
1986-1993 Section Manager and Program Manager, Argonne National Laboratory  
1983-1985 Research Associate, National Regulatory Research Institute  
1982-1983 Economist, American Electric Power Service Corporation  
1980-1982 Economist, Illinois Commerce Commission  
1978-1980 Valuation Analyst, General Telephone Company of Indiana

**PUBLICATIONS AND SELECTED CLIENT REPORTS**

“Critical Issues in the Regulation of Electric Utilities in Wisconsin,” Prepared for The Wisconsin Policy Research Institute, April 2006 (with Karl A. McDermott and Carl Peterson).

Implementation of a Power Cost Adjustment Mechanism: Background, Issues and Recommendations Omaha Public Power District, November 18, 2005

“A Review of Banded Fuel Adjustment Mechanisms,” Prepared for Nova Scotia Power Company, Inc. for inclusion in standard rate filing, May 3, 2004 (with Mathew Morey).

“Incentive Regulation in Network Industries: Experience and Prospects in the U.S. Telecommunications, Electricity and Natural Gas Industries,” *Review of Network Economics*, Vol. 2, Issue 4 - December 2003, pp. 316-337 (with Mark E. Meitzen and Philip E. Schoech).

*Congestion Management System Implementation Studies*, Prepared for ISO New England, January 14, 2003 (with Laurence D. Kirsch and Mathew J. Morey).

*Pricing Electricity for Competition and Efficiency*, Prepared for the American Public Power Association, Washington, DC, December 2001.

*Redesigning Distribution Tariffs For Restructured Electric Power Markets*, Prepared for the Edison Electric Institute, Washington, DC, April 2000 (with Laurence D. Kirsch).

“Power in the 21<sup>st</sup> Century: Progress or Gridlock?” *Forum for Applied Research and Public Policy*, Vol. 12, No. 2, Summer 1997 (with Theresa A. Flaim).

"Competition in the Electric Power Industry: A View from New York," in *Competition in the Electric Industry: Emerging Issues, Opportunities and Risks for Facility Operators*, National Academy Press, Report No. 132, Washington, DC, 1996.

"The Changing Electric Utility Industry," *Economic Times*, Vol. 2, No. 3, October 1993.

*Technical Research Methods for the Economic Impact Analysis in the Power Marketing Program Environmental Impact Study*, Argonne National Laboratory, February 17, 1992.

*The Economic Impacts of Noxious Facilities on Wages and Property Values: An Exploratory Analysis*, ANL/EAIS/TM-67, February 1992 (with Leslie A. Nieves).

*Assessing the Impacts of Regional Characteristics on the Location of Manufacturing Facilities: A Review of Recent Methods and Findings*, Argonne National Laboratory Technical Memorandum, ANL/EAIS/TM-64, January 1992 (with F. J. Calzonetti).

*Gas Reliability in a Least Cost Planning Framework*, Prepared for the Illinois Department of Energy and Natural Resources, The Center for Regulatory Studies, May 15, 1991 (with M. J. Morey and D. H. Hiebert).

"Evaluating Flexible Pricing Alternatives: A Strategic Response for Electric Utilities," *Public Utilities Fortnightly*, July 5, 1990 (with K. W. Costello).

"Competitive Pricing in the Electric Utility Industry," *Resources and Energy* (Special Issue on Electric Utility Regulation), Vol. 12, 1990 (with K. W. Costello).

"An Appraisal of the Death Spiral Hypothesis," *Electric Potential*, Vol. 3, No. 3, Spring 1987 (with Kenneth W. Costello).

"Economic Challenges Facing Rural Electric Consumers," *Management Quarterly*, Vol. 27, No. 3, Fall 1986 (with Kenneth W. Costello).

## TESTIMONY

United States District Court, Eastern District of Tennessee, Northern Division, Civil Action 3:01-CV-661. *Bowater Incorporated and Bowater Newsprint South, Inc. v. Tennessee Valley Authority*, Expert Report (Rebuttal) of Ross C. Hemphill, October, 27, 2004.

Public Service Commission of Wisconsin, Docket No. 05-CE-117. Application of Wisconsin Electric Power Company; Wisconsin Energy Corporation; and W.E. Power, LLC for Certificate of Public Convenience and Necessity for Construction of Two Large Electric Generation Facilities, 2002.

Ontario Energy Board. Union Gas Limited, Docket RP-2001-0029 (Customer Review Process), Testimony recommending the exclusion of provincial income tax changes from non-routine adjustments in the price cap adjustment mechanism, 2002.

New York Public Service Commission, Docket 99-E-1470, Affidavit on behalf of the electric utilities in New York, Motion to Initiate an Inquiry into the Reasonableness of the Rates, Terms and Conditions for the Provision of Electric Standby Service, 2001.



Ontario Energy Board. Union Gas Limited, Docket RP-1999-0017, Testimony and Exhibits Supporting the Implementation of Performance-Based Regulation of Distribution, Transmission and Storage of Natural Gas, 2000.

New York Public Service Commission. Niagara Mohawk Power Corporation, Docket 94-E-0098, Testimony and Exhibits In Support of Settlement Agreement For Corporate Restructuring, 1997.

New York Public Service Commission. Niagara Mohawk Power Corporation, Docket 95-E-0172, Testimony on the design of backup and supplemental services, 1995.

New York Public Service Commission. Niagara Mohawk Power Corporation, Docket 94-E0098, 0099, Testimony on Pricing Policy in Multi-Year Rate Proceeding, 1994-95.

New York Public Service Commission. Niagara Mohawk Power Corporation, Docket 93-E0376, 0378, Testimony supporting settlement in rate proceeding, 1993.

City of Chicago vs. Illinois Commerce Commission, Docket 92-0229, Testimony regarding proper allocation of city franchise fees, March 1993.

Pennsylvania Public Utility Commission. Metropolitan Edison Company, Docket R-922314, Testimony on cost of service and rate design for the General Service Class, August 1992.

Illinois Commerce Commission. Commonwealth Edison Company, Docket 90-0169, Testimony on the residential rate design and intra-class revenue recovery, November 5, 1990.

The Supreme Court of the United States. Submitted to the Special Master, No. 112, Original In, October Term, 1987, *State of Wyoming vs. State of Oklahoma*, Testimony concerning the economics of fuel choice for Oklahoma electric utilities, submitted July 1989.

Illinois Pollution Control Board, R82-14, Volatile Organic Material Emission From Stationary Sources: RACT III, Testimony concerning the economic impacts associated with amendments to 35 Illinois Administrative Code 215.204 and 215.207, March 1987.

Illinois Commerce Commission, Commonwealth Edison Company, Docket 82-0026, Testimony concerning rate design and cost-of-service, 1982.

Illinois Commerce Commission, Consolidated Telephone Company, Docket 81-0364, Written testimony regarding telephone cost-of-service, 1982.

Illinois Commerce Commission, Commonwealth Edison Company, Docket 81-0598, Written testimony concerning interruptible electric service, 1982.

Illinois Commerce Commission, Central Illinois Light Company, Docket 81-0600, Testimony regarding natural gas rate design and inter-class allocation of revenue for electric service, 1982.

Illinois Commerce Commission, Northern Illinois Gas Company, Docket 81-0609, Testimony concerning natural gas rate design, cost-of-service, and advertising expenses, 1982.

Illinois Commerce Commission, Iowa-Illinois Gas and Electric Company, Docket 80-0367, Investigation of compliance to PURPA standards. Preparation of testimony concerning cost of service and rate design, 1980.



Iowa-Illinois Gas and Electric, Illinois Commerce Commission, Docket 80-0511, Preparation of testimony regarding natural gas rate design, 1981.

Illinois Commerce Commission, Candlewick Lake Utilities Company, Docket 81-0011, prepared written testimony regarding cost-of-service and rate design of water service, 1981.

Illinois Commerce Commission, Peoria Water Company, Docket 81-0014, prepared written testimony regarding cost-of-service for water service, 1981.

## RECENT PRESENTATIONS AND SEMINARS

*Retail Pricing for Electricity*, Presented at *Camp NARUC: The Annual NARUC Regulatory Studies Program*, Institute of Public Utilities, Michigan State University, 2003-2007.

*Performance-Based Regulation & Service Quality*, Advanced Regulatory Studies Program, Institute of Public Utilities, Michigan State University, 2006-2007.

*Cost of Service Workshop*, Electric Utility Consultants, Inc., Denver, CO, April 20, 2005.

*Unbundled Electric Pricing*, Presented to the Edison Electric Institute Committee on Regulation and Competition, Chicago, IL October 2004.

*Energy Basics—Emerging Rate Design Trends*, Invited lecturer for the Wisconsin Public Utilities Institute, University of Wisconsin, 1999-2005.

*Issues in the Application of PBR to Distribution Pricing*, Paper presented at Performance-Based Ratemaking Conference, Electric Utility Consultants, Inc., Westminster, CO, September 16, 2002.

*Market-Based Pricing in the Absence of a Market*, Presented at *Connecting Wholesale and Retail Electricity Markets*, Electric Utility Consultants Conference, Westminster, CO, August 20-21, 2002.

*Pricing Principles for the Optimal Integration of Distributed Resources*, Paper prepared for and presented to the Electric Power Research Institute's 7<sup>th</sup> Annual Distributed Resource Conference and Exhibition, Dallas, TX, March 21, 2002.

*Efficient Pricing of Standby Delivery Services*, Presented to the Rates Committee, Edison Electric Institute, Las Vegas, NV, March 12, 2002.

*Efficient Pricing of Unbundled Distribution Services*, Presented at the Edison Electric Institute Conference on Unbundling, New Orleans, LA, February 25, 2002.



**STATE OF MICHIGAN**  
**BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

In the Matter of the application of )  
CONSUMERS ENERGY COMPANY )  
for authority to increase its rates for )  
the generation and distribution of )  
electricity and for other relief. )  
\_\_\_\_\_ )

Case No. U-15245

**PROOF OF SERVICE**

STATE OF MICHIGAN )  
 ) ss  
COUNTY OF WASHTENAW )

Jacqueline K. Tinney, being first duly sworn, deposes and says that she is employed at Dickinson Wright PLLC, and that on November 6, 2007, she caused a copy of the *Direct Testimony of Ross C. Hemphill on Behalf of Constellation NewEnergy, Inc.*, to be served upon the parties listed below via email.

\_\_\_\_\_  
Jacqueline K. Tinney

Subscribed and sworn to before me,  
a Notary Public in and for said County,  
this 6<sup>th</sup> day of November, 2007.

\_\_\_\_\_  
Elaine M. Masters, Notary Public  
Washtenaw County, Michigan  
Acting in Washtenaw County, Michigan  
My Commission Expires: 9/23/07

Service List  
MPSC Case No. U-15245

<p><b>Administrative Law Judge</b> Hon. Mark E. Cummins <a href="mailto:cumminsm1@michigan.gov">cumminsm1@michigan.gov</a></p>	<p><b>Consumers Energy</b> Jon Robinson H. Richard Chambers John Shea Rhonda Morris Raymond McQuillan <a href="mailto:jrobinson@cmsenergy.com">jrobinson@cmsenergy.com</a> <a href="mailto:hrchambers@cmsenergy.com">hrchambers@cmsenergy.com</a> <a href="mailto:jcshea@cmsenergy.com">jcshea@cmsenergy.com</a> <a href="mailto:mpscfilings@cmsenergy.com">mpscfilings@cmsenergy.com</a></p>
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