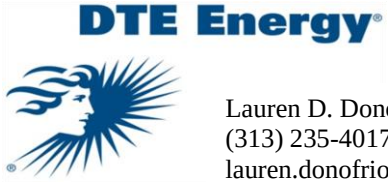
DTE Electric Company One
Energy Plaza, 1635 WCB
Detroit, MI 48226-1279



Lauren D. Donofrio
(313) 235-4017
lauren.donofrio@dteenergy.com

March 29, 2019

Kavita Kale
Executive Secretary
Michigan Public Service Commission
7109 West Saginaw Highway
Lansing, MI 48917

RE: In the matter of the Application of DTE Electric Company for approval of its Integrated Resource Plan pursuant to MCL 460.6t, and for other relief
MPSC Case No: U-20471

Dear Ms. Kale:

Attached for electronic filing in the above referenced matter is DTE Electric Company's Application and Testimony and Exhibits of Witnesses, Kevin L. Bilyeu, Judy W. Chang, Shawn D. Burgdorf, Keegan O. Farrell, Kelly A. Holmes, Jestin M. Hunnell, Markus B. Leuker, Barry J. Marietta, Laura Mikulan, Matthew T. Paul, Sharon G. Pfeuffer, Ryan C. Pratt, Terri L. Schroeder, Don Stanczak, and Yujia Zhou. Also attached is the Proof of Service.

Very truly yours,

Lauren D. Donofrio

Digitally signed by Lauren D. Donofrio
Date: 2019.03.29 12:13:14 -04'00'

Lauren D. Donofrio

LDD/lah
Enclosure

c: Service List

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the Application of	)	
DTE ELECTRIC COMPANY for	)	
approval of its Integrated Resource Plan	)	
pursuant to MCL 460.6t, and for other relief	)	Case No. U-20471

APPLICATION

DTE Electric Company ("DTE Electric" or the "Company") respectfully requests that the Michigan Public Service Commission ("MPSC" or the "Commission") issue an order approving the Company's Integrated Resource Plan ("IRP") pursuant to Section 6t of 2006 PA 341, MCL 460.6t, the Commission's December 20, 2017 order in Case No. U-18461 and November 21, 2017 order in Case No. U-18481, and all other applicable law. In support of this Application, DTE Electric states as follows:

I. INTRODUCTION

1. DTE Electric is a wholly-owned subsidiary of DTE Energy that supplies retail electric service to customers located in Michigan. The Company's business address is One Energy Plaza, Detroit, Michigan, 48226. Any correspondence concerning this application shall be directed to its attorneys at their business address provided below.

2. DTE Electric's retail electric business is subject to the jurisdiction of the Commission pursuant to various provisions of 1909 PA 106, as amended, MCL 460.551, *et seq*, 1919 PA 419, as amended, MCL 460.54, *et seq*, 1939 PA 3, as amended, MCL 460.1, *et seq*, including 2016 PA 341. Pursuant to these statutory provisions, the Commission has the power and jurisdiction to regulate DTE Electric's retail electric rates.

3. In this Application, DTE Electric presents a robust IRP that explores a multitude of variables to reach a reasoned plan that is right for our customers and for Michigan. The Company considered its current portfolio, capacity needs, regulatory and environmental compliance, and the Commission's planning objectives in developing its IRP. The Company also focused on more clean energy, and less coal. Through the IRP process, DTE Electric has developed a Proposed Course of Action ("PCA") that identifies the most reasonable and prudent means of meeting the Company's energy and capacity needs through 2035. To this end the Company has separated its PCA into two parts, the near-term defined PCA covering years 2020-2024 and the flexible PCA covering years 2025-2035. DTE Electric's defined PCA includes:

a. Additional 11 MW of solar plus storage pilot projects;

b. Additional 693 MW of wind energy;

c. Additional Voluntary Green Pricing (VGP) program renewables (MIGreenPower) between 465 MW and 715 MW depending upon subscription levels;

d. Acceleration of previously announced retirement of the Trenton Channel Power Plant to 2022;

e. Acceleration of previously announced retirement of St. Clair Power Plant Unit 7 to 2022;

f. Accelerated retirement of St. Clair Unit 1 to 2019;

g. River Rouge Unit 3 will end the use of coal in 2020, and will continue to operate until 2022 on recycled industrial gases and natural gas;

h. Increase Energy Waste Reduction ("EWR") programs to achieve annual energy savings to 1.65% in 2020 and 1.75% in 2021;

i. Increase Demand Response ("DR") programs to 859 MW by 2024; and

j. Conduct a Conservation Voltage Reduction and Volt-Var Optimization ("CVR/VVO") pilot program by 2020

The Company's flexible PCA contains commitments by DTE Electric to reach two renewable targets in the years 2025-2035, but leaves several issues to be determined in the next IRP:

a. The Company will continue to build renewables to support our clean energy and carbon reduction goals, and expects to add 525 MW of solar between 2025 - 2030, with another 2000 MW of solar by 2040;

b. The EWR program levels will be analyzed in subsequent IRPs, but it is expected that the 1.75% annual reduction level of EWR that begins in 2021 would at least be continued through 2040;

c. DR program levels will be analyzed in subsequent IRPs, but it is expected that the 859 MW that is expected to be achieved by 2024 will at least be maintained at that level through 2040;

d. Building on the momentum of our current VGP programs, we have included up to 675 MW of voluntary renewable energy between 2025 and 2030;

e. Belle River Units 1 and 2 are currently expected to retire in 2029 and 2030 respectively, but that retirement timing will be reevaluated in the next IRP;

f. Monroe Power Plant is planned for retirement by 2040, but that retirement timing will be reevaluated in the next IRP;

g. CVR/VVO will be analyzed in subsequent IRPs (50 MW by 2030 included in two of the four potential pathways in the flexible years of the PCA);

h. Additional generation resources will be analyzed in the next IRP. There is a combined cycle gas addition in two of the four potential pathways in the flexible

years of the PCA. The size of the potential gas addition would be a 414 MW 1x1 combined cycle. In the two plans that do not have combined cycle additions, there are other resources selected to fill the capacity need in 2030.

DTE Electric's defined PCA for years 2020-2024 is fully integrated and requires approval in its entirely; the flexible PCA for years 2025-2035 is by its nature undefined and may be separately approved.

II. DEVELOPMENT OF THE IRP AND OVERVIEW OF THE PCA

4. The required components of an IRP filing are specifically provided in MCL 460.6t(5)(a)-(o). Furthermore, MCL 460.6t(8) provides that the Commission shall approve a proposed IRP if the Commission determines that the IRP represents the most reasonable and prudent means of meeting the electric utility's energy and capacity needs. To make such a determination, the Commission must consider whether the proposed IRP appropriately balances the following factors:

(i) Resource adequacy and capacity to serve anticipated peak electric load, applicable planning reserve margin, and local clearing requirement.

(ii) Compliance with applicable state and federal environmental regulations.

(iii) Competitive pricing.

(iv) Reliability.

(v) Commodity price risks.

(vi) Diversity of generation supply.

(vii) Whether the proposed levels of peak load reduction and energy waste reduction are reasonable and cost effective. Exceeding the renewable energy resources and energy waste reduction goal in section 1 of the clean and renewable energy and energy waste reduction act, 2008 PA 295, MCL 460.1001, by a utility shall not, in and of itself, be grounds

> for determining that the proposed levels of peak load reduction, renewable energy, and energy waste reduction are not reasonable and cost effective.

5. Pursuant to MCL 460.6t, the Commission was required to: (i) establish modeling scenarios and assumptions each electric utility should include in addition to its own scenarios and assumptions in developing an IRP and (ii) establish filing requirements, including application forms and instructions, and filing deadlines for an IRP filed by a utility regulated by the Commission. Specifically, MCL 460.6t(1)(f) provides that the Commission shall:

> (f) Establish the modeling scenarios and assumptions each electric utility should include in addition to its own scenarios and assumptions in developing its integrated resource plan filed under subsection (3), including, but not limited to, all of the following:
>
> (i) Any required planning reserve margins and local clearing requirements.
>
> (ii) All applicable state and federal environmental regulations, laws, and rules identified in this subsection.
>
> (iii) Any supply-side and demand-side resources that reasonably could address any need for additional generation capacity, including, but not limited to, the type of generation technology for any proposed generation facility, projected energy waste reduction savings, and projected load management and demand response savings.
>
> (iv) Any regional infrastructure limitations in this state.
>
> (v) The projected costs of different types of fuel used for electric generation.

Furthermore, MCL 460.6t(3) provides, in relevant part, that:

> The commission shall issue an order establishing filing requirements, including application forms and instructions, and filing deadlines for an integrated resource plan filed by an electric utility whose rates are regulated by the commission.

In compliance with the above statutory provisions, the Commission issued an Order dated November 21, 2017 in Case No. U-18418 approving "Michigan Integrated Resource Planning Parameters." The Commission also issued an Order December 20, 2017 in Case Nos. U-18461, which approved "Integrated Resource Plan Filing Requirements." These documents set forth all

required IRP modeling scenarios and assumptions, requirements, instructions, and guidelines for utilities seeking relief pursuant to MCL 460.6t.

6. In addition, in the Commission's final order in the Company's Certificate of Necessity (CON) case issued on April 27, 2018, U-18419, the Commission directed the Company to:

a. include an additional scenario evaluating a specific portfolio ramping up over the years preceding 2029, that could replace the capacity and energy lost due to the retirement of the Belle River Power Plant;

b. provide an updated rate impact analysis related to BWEC;

c. collaborate with MISO and ITC on reliability planning for coal retirements;

d. assume renewal of PURPA contracts;

e. include a better evaluation of storage options; and

f. include a straightforward analysis of the rate impact of retiring Tier 2 plants and adding the BWEC.[1]

7. DTE Electric's IRP meets the statutory requirements under MCL 460.6t, the filing requirements of U-18461 and meets the individual requirements imposed by the Commission in its April 27, 2018 order in Case No. U-18419. Accompanying this Application are the Company's testimony and exhibits, which address the components required to be included in an IRP, address each factor the Commission must consider in approving an IRP, address the Commission's specific requests, and establish that DTE Electric's PCA is "the most reasonable and prudent means of meeting the electric utility's energy and capacity needs." Commensurate with this filing, the

[1] This particular direction was not included in the ordering paragraph, but rather on page 120 of the order.

Company has provided a spreadsheet showing how DTE Electric has complied with each of the filing requirements as Exhibit A-1.

8. The Company also addresses the planning objectives set forth by the Commission and DTE Electric's complementary planning principles, which are reliability, affordability, clean, flexible and balanced, compliant, reasonable risk, and community impact.

9. The DTE Electric 2019 IRP meets the Commission's modeling scenarios, assumptions, and filing requirements. The Company's modeling utilizes four scenarios; three that are required under the Michigan Integrated Resource Planning Parameters (MIRPP), pursuant to section 6t of 2016 PA 341 and a fourth based specifically on DTE assumptions (Reference). The required scenarios include Business as Usual, Emerging Technologies, and Environmental Policy. As identified in the 6t requirements, these prescribed scenarios use the 2018 Annual Energy Outlook from the U. S. Energy Information Administration "Natural Gas: Henry Hub Spot Price: Reference Case" (2018 EIA gas forecast) and do not include a CO_2 emission cost adder, as it was not needed to reach the specified CO_2 reduction targets for the three MIRPP scenarios. For each of the four IRP scenarios, various sensitivities were run. The sensitivities included those required by the Commission order, those requested by stakeholders, and some that DTE utilized to show a robust range of possible future outcomes. Sensitivities included varying levels of load, EWR, capital costs, renewable energy, gas prices, retirement dates, demand response, and CO_2 emission adders.

10. The Company conducted a stakeholder outreach process consisting of public open houses and technical workshops. The intent was to implement a comprehensive, transparent, and participatory stakeholder engagement process. The Company hosted four technical workshops for stakeholders involved in the IRP's technical aspects and regulatory process, and three public open

houses to serve customers and the general public. These events provided stakeholders with various opportunities to provide input on how to meet Michigan's future energy and capacity needs, including reviewing and commenting on IRP inputs, sensitivities, and technology options.

11. Upon completion of the IRP modeling process, the Company determined that it did not have a capacity need to be filled in the first ten (10) years of the IRP planning period. DTE Electric also determined that while it makes sense to have a determined or fixed PCA for the first five years, beyond that point it is neither reasonable nor prudent to make a determination of how to meet the projected capacity need in 2030. Thus, the PCA for the last ten years is a flexible PCA. While two of the least-cost plans selected under the four scenarios included an additional combined cycle gas turbine addition in 2030, the Company does not believe it is prudent to commit to such a resource at this time. Given the pace of technological advancement in the industry, DTE Electric expects that when the capacity need created by the closure of the Belle River Power Plant is reassessed, there may be additional options on the table that simply aren't technically or economically feasible today. For this reason, the PCA for the last ten years of the IRP plan period must remain flexible and open to changing and evolving technology. The first five years of the PCA take into account existing resources, resources that are already planned, increases in renewables in the REP, increases in voluntary renewables in the MIGreenPower programs, and the addition of the Blue Water Energy Center. The Company's near-term PCA includes the accelerated closure of St. Clair and Trenton Channel units, and the continued operation of River Rouge Unit 3 for two years on recycled industrial gas and natural gas. The first five years of the PCA also include increases in EWR, DR, and a CVR/VVO pilot and program.

12. The Company tested its PCA using a rigorous risk assessment methodology consistent with the Commission's order in U-18461. Five risk-analysis methodologies were used

to test the feasibility of the proposed course of action: a Stochastic risk analysis, a change analysis, application of the planning principles, evaluation of key inputs (changes since the commencement of the IRP modeling process), and using scenario analysis and global sensitivity analysis.

13. The Company includes with this filing an IRP Report detailing DTE Electric's existing generation portfolio and PPAs, resource adequacy through 2040, and selection of the PCA as Exhibit A-3.

III. COST PRE-APPROVALS

14. MCL 460.6t(11) provides that, in approving an IRP, the Commission shall specify the approved costs for future recovery as follows:

> In approving an integrated resource plan under this section, the commission shall specify the costs approved for the construction of or significant investment in an electric generation facility, the purchase of an existing electric generation facility, the purchase of power under the terms of the power purchase agreement, or other investments or resources used to meet energy and capacity needs that are included in the approved integrated resource plan. The costs for specifically identified investments, including the costs for facilities under subsection (12), included in an approved integrated resource plan that are commenced within 3 years after the commission's order approving the initial plan, amended plan, or plan review are considered reasonable and prudent for cost recovery purposes.

15. DTE Electric proposes pre-approval of capital costs related to EWR, DR, and CVR/VVO that the Company will commence within three years of the Commission's approval of the Company's IRP and PCA.

16. More specifically, DTE Electric requests pre-approval of:

a. $103 million in projected EWR capital costs in 2020-2022;

b. $24 million of projected DR capital costs beginning May 1, 2020 through December 31, 2022, which is incremental to the DR spend requested in DTE Electric's current rate case, U-20162; and

c. $0.7 million in cumulative capital costs for the CVR/VVO program from 2019 to 2020, related to the CVR/VVO pilot.

IV. CAPACITY NEED AVOIDED COSTS AND STANDARD OFFER CAP

17. DTE Electric does not have a persistent capacity need until 2030 when the Belle River Power Plant is expected to retire, and requests that the Commission approve the Company's assessment of its capacity need.

18. DTE Electric does not address PURPA avoided cost rates in this IRP. Avoided costs are the subject of litigation currently before the Commission in Case No. U-18091.

19. In the Commission's December 20, 2018 order in Case U-18091, the Commission stated that the "Standard Offer cap will be revisited in the biennial review and will also be addressed in the company's upcoming integrated resource plan (IRP)." The proper size for the standard offer contract is currently being litigated in Case No. U-18091. Consistent with the position DTE Electric has taken in that case, the Company is proposing standard offer contracts be made available to QFs up to 150 kWs.

V. TESTIMONY AND EXHIBITS

20. Concurrently with filing this Application, DTE Electric is also filing written testimony and exhibits in support of its IRP and other relief sought in this case. The relief described in the testimony and exhibits should be considered as if specifically requested in this Application. DTE Electric expressly reserves the right to revise, amend, or otherwise change the relief it is requesting throughout the proceeding up to and including any exceptions and replies to exceptions to the proposal for decision. DTE Electric also reserves the right, pursuant to MCL 460.6t(7) to update the cost estimates within 150 days of the filing of the Application.

VI. OTHER ISSUES

21. In the event that the Commission issues an order in another case that materially impacts this matter, or DTE Electric's requests in this proceeding, that order or orders may need to be considered in this case.

22. The Company has included a Letter of Transmittal as Attachment A to this Application, as required by the Commission's IRP filing requirements approved in Case No. 18461. The Company's Letter of Transmittal expresses a commitment to the Company's proposed course of action and resource acquisition strategy, and has been signed by an officer of the Company who has authority to commit the Company to the resource acquisition strategy, acknowledging that the Company reserves the right to make changes to its resource acquisition strategies as appropriate due to changing circumstances.

23. Due to the confidential nature of much of the information contained in and included with the Company's IRP filing, the Company is proposing entry of a protective order. The Company's proposed protective order is included as Attachment B to this Application. The Company requests that the entry of its proposed protective order be considered during the prehearing conference for this matter.

VII. REQUEST FOR RELIEF

WHEREFORE, DTE Electric Company requests that the Michigan Public Service Commission:

A. Approve DTE Electric's Integrated Resource Plan by approving the Proposed Course of Action as the most reasonable and prudent means of meeting the Company's energy and capacity needs;

B. Find that DTE Electric does not have a persistent capacity need for the next ten (10) years;

C. Pre-approve DTE Electric's proposed Energy Waste Reduction, Demand Response and Conservation Voltage Reduction and Volt-Var Optimization capital costs, commencing within three years following the Commission's approval of the Company's Integrated Resource Plan; and

D. Grant DTE Electric any other and further relief as is just and reasonable.

Respectfully submitted,

DTE ELECTRIC COMPANY
Legal Department

By: Lauren D. Donofrio Digitally signed by Lauren D. Donofrio Date: 2019.03.29 12:09:46 -04'00'

Lauren D. Donofrio (P66026)
Andrea E. Hayden (P71976)
Jon P. Christinidis (P47352)
David S. Maquera (P66228)
Megan Irving (P75232)
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One Energy Plaza, 1635 WCB
Detroit, Michigan 48226
(313) 235-3813

DTE ELECTRIC COMPANY

By: Don M. Stanczak Digitally signed by Don M. Stanczak Date: 2019.03.29 12:10:31 -04'00'

Don M. Stanczak
Vice President - Regulatory Affairs

Dated: March 29, 2019

ATTACHMENT A

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the Application of	)	
DTE ELECTRIC COMPANY for	)	
approval of its Integrated Resource Plan	)	
pursuant to MCL 460.6t, and for other relief	)	Case No. U-20471

TRANSMITTAL LETTER

I, Irene M. Dimitry, hereby express DTE Electric Company's commitment to the Company's approved Integrated Resource Plan Proposed Course of Action, which represents the Company's preferred resource plan and resource acquisition strategy, and hereby sign this Letter of Transmittal as an officer of the Company having the authority to commit the Company to the resource acquisition strategy, acknowledging that the Company reserves the right to make changes to its resource acquisition strategies as appropriate due to changing circumstances.

Dated: March 29, 2019

Irene M. Dimitry

Digitally signed by Irene M. Dimitry
Date: 2019.03.29 12:11:05 -04'00'

Irene M. Dimitry
VP Business Planning & Development
DTE Electric Company

ATTACHMENT B

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the Application of	)	
DTE ELECTRIC COMPANY for	)	
approval of its Integrated Resource Plan	)	
pursuant to MCL 460.6t, and for other relief	)	Case No. U-20471

PROTECTIVE ORDER

This Protective Order governs the identification, restricted use, and disposition of nonpublic confidential information and materials ("Protected Material") so designated by DTE Electric Company ("DTE Electric"), and disclosed by DTE Electric to any party to this case who receives it ("Party" or "receiving Party") as set forth in this Order. Accordingly, IT IS HEREBY ORDERED THAT:

1. Protected Material:

(A) For purposes of this Protective Order, "Protected Material" includes, but is not limited to, DTE Electric Company's ("DTE Electric") licensed software ("Software") from ABB and any information that is either directly licensed from or obtained, created, derived, facilitated, or accessed under DTE Electric's license with any third party such as the files listed in Attachment 1 and Attachment 2, which are non-exhaustive lists and may be supplemented at any time. Protected Material also includes workpaper files related to third-party contracts including, but not limited to, those files listed in Attachment 3. In addition, Protected Material includes information so designated by a party ("Producing Party") and disclosed by that Producing Party to another party ("Party" or "Receiving Party") as set forth in this Order.

(B) Any information that DTE Electric or any DTE Electric witness considers to be confidential shall be marked or identified by DTE Electric as "CONFIDENTIAL-SUBJECT TO PROTECTIVE ORDER IN CASE NO. U-20471." Software executable files containing protected material may not be capable of being marked with the foregoing required protective language. The inability to mark software executable files containing protected material with such protective language shall not diminish the requirements of this Protective Order. It shall be sufficient if the medium used to deliver software executable files containing protected information is marked with the required protective language. However, any output from the software executable files containing protected material that is generated only as a reproducible document, whether electronic or non-electronic, that is capable of being marked with the required protective language, shall be marked by the party who generated the output with such protective language and subject to the requirements of this Protective Order. This Order also protects and fully applies to any other materials that are made subject to this Order by the presiding officer, the Commission, and any other court or tribunal with competent jurisdiction, as well as any memoranda, handwritten notes, and any other form of information that copies, reproduces, or discloses such material or the information contained in it, all of which shall be Protected Material. All copies of Protected Material shall be conspicuously marked as Protected Material by the Party or the person authorized by the Party to make the copy. Notes of Protected Material shall be conspicuously marked as Protected Material by the person making the notes. All Protected Material in the possession of a Party shall be maintained in a secure place, with access limited to persons authorized according to this Order.

(C) DTE Electric retains the right to seek and obtain further restrictions on the dissemination or use of Protected Material to persons or entities that have or may subsequently

seek to intervene in this case. Nothing in this Order precludes DTE Electric from objecting to any use of Protected Material.

(D) The parties agree that this protective order is insufficient to protect Critical Energy Infrastructure Information (CEII), North American Electric Reliability Corporation (NERC) Critical Infrastructure Protection (CIP) material and information, DTE Electric distribution system information and operational data including Supervisory Control and Data Acquisition (SCADA) information, confidential Midcontinent Independent System Operator (MISO) and ITC Holdings Corp and/or its affiliate companies' information in the possession of DTE Electric Company, technical data subject to U.S. export control laws and regulations, including but not limited to 10 CFR Part 810 *et seq.*, and information regarding Cyber Security and such information shall not be disclosed without agreement of the parties or further proceedings regarding this information including, but not limited to, a determination by the presiding officer whether, and if so to what extent, the material is to be disclosed, and any additional protections that may be necessary on a case by case basis. The parties reserve the right to exhaust any appeals to the Commission and any court or appellate court of competent jurisdiction prior to making any ordered disclosure.

(E) The parties agree that this protective order is insufficient to protect particularly sensitive commercial information regarding current contract negotiations and contract-re-negotiations and such information shall not be disclosed without agreement of the parties or further proceedings regarding this information including, but not limited to, a determination by the presiding officer whether, and if so to what extent, the material is to be disclosed, and any additional protections that may be necessary on a case by case basis. The parties reserve the right to exhaust any appeals to the Commission and any court or appellate court of competent jurisdiction prior to making any ordered disclosure.

2. Access to and Use of Protected Material:

(A) DTE Electric's release of Protected Material identified in Attachments 1 and 2, to the receiving Party is subject to the conditions that (1) DTE Electric or DTE Electric witness is legally and/or contractually permitted to disclose and provide the Protected Material identified in Attachments 1 and 2 to the receiving Party and (2) the receiving Party is legally and/or contractually permitted to receive the Protected Material identified in Attachments 1 and 2 from DTE Electric. DTE Electric is not contractually permitted to disclose the Protected Material identified in Attachments 1 and 2 to a party who does not have an appropriate license from ABB. A Party may authorize access to and use of Protected Material by a Reviewing Representative identified by the Party, but only as necessary to analyze the Protected Material, make or respond to discovery, present evidence, consider strategy, evaluate settlement, and prepare testimony, cross-examination, argument, briefs or other filings in this case, including but not limited to any administrative or judicial appeals. Such individuals shall not release or disclose the content of Protected Material to any other person or use such information for any other purpose.

(B) All Protected Material made available pursuant to this Order shall be made available only to a Reviewing Representative, who may be only the following persons:

(1) an author, addressee or originator of the Protected Material, but such person shall be a reviewing Representative only with respect to confidential information to which the person previously had access;

(2) an attorney who has entered an appearance in this case for the receiving Party;

(3) an attorney, paralegal, or other employee associated for purposes of this case with an attorney described immediately above, and who is acting at the direction

of that attorney, with that attorney being responsible for assuring that persons under his or her supervision and control comply with this Order;

(4) an expert retained by the receiving Party for purposes of advising, preparing materials for, or testifying in this case; and

(5) an attorney or other staff member of a Party with decision-making responsibility regarding the above-captioned case.

(D) Prior to the release of any Protected Material, including copies, reproductions, and notes, to any individual identified above, the receiving Party's legal counsel shall secure and provide DTE Electric's legal counsel with an executed Nondisclosure Certificate in the form of the certificate attached to this Order (see Attachment 4), by which a Reviewing Representative who will be granted access to Protected Material acknowledges that he or she understands that such access is provided pursuant to this Order, and that he or she will abide by and agrees to be bound by the terms of this Order.

(E) DTE Electric retains the right to object to any designated Reviewing Representative due to a claimed unacceptable risk of misuse of confidential information. In the event of such an objection, DTE Electric and the requesting Party will attempt to reach an agreement to accommodate that Party's requested review. If no agreement is reached, then either DTE Electric or the Party may submit the dispute to the presiding officer. If DTE Electric notifies a Party of an objection to a Reviewing Representative, then the Protected Material shall not be provided to that Reviewing Representative until the objection is resolved by agreement or by the presiding officer.

(F) Members of the Commission, the Commission staff assigned to assist the Commission with its deliberations, and the presiding officer shall have access to all Protected Material that is submitted to the Commission under seal.

(G) Protected Material shall be reviewed, used, and disclosed only by or to the persons authorized under this Order and only in accordance with the terms specified in this Order. The use, review, and disclosure of Protected Material are limited to this proceeding and any administrative or judicial appeals of this proceeding.

3. <u>Procedures</u>:

If a Party receiving access to Protected Material desires to incorporate, utilize, refer to, or otherwise use Protected Material in this case, then the Party shall do so only pursuant to procedures that will maintain the confidential character of the Protected Material, including without limitation the following:

(A) *Written Submissions.* If a party discloses Protected Material in pre-filed testimony, including any exhibit(s) to such testimony, briefs, pleadings or other written materials, then all such reference(s) shall be placed in a separate sealed record and designated as such. Simultaneously, public versions, which shall be identical versions of the documents but with the Protected Material redacted, shall be filed, offered, introduced or otherwise disclosed and served in the usual manner.

(B) *Hearing Room and Filing Procedure.* In proceedings before the Commission or presiding officer designated by it, oral testimony, examination of witnesses, and argument on the Protected Material shall be conducted on a separate record. These separate record proceedings shall be closed to all persons except DTE Electric and authorized representatives of parties otherwise subject to this Order. If a Party intends prior to any evidentiary hearing for this case to use Protected Material in oral testimony, cross-examination or argument, that Party shall provide reasonable notice to allow the presiding officer an opportunity to take measures within his or her control to protect the confidentiality of the information.

(C) *Seal*. Copies of documents filed with the Commission that contain Protected Material, including portions of the exhibits, transcripts and briefs or other written disclosures that refer to Protected Material, shall be marked or identified as, "CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER IN CASE NO. U-20471" and shall be maintained in a separate portion of the record under seal, segregated in the files of the Commission, and withheld from inspection by any person not bound by the terms of this Order.

(D) *Discovery*. The procedures specified in this Order apply to all Protected Material provided by DTE Electric pursuant to discovery requests made prior to, during, or after hearings in proceedings to which the Order pertains.

(E) *Use of Sealed Information.* Sealed information may be used as provided in this Order, and for the determination of this case and any administrative or judicial appeals of this case. Otherwise, no information under seal pursuant to this Order shall be used in any manner except pursuant to this Order, additional Commission order, or final order of a court of competent jurisdiction after notice to DTE Electric and hearing, either unsealing such information or providing for the use of such information.

4. Preservation of Confidentiality:

No person who is afforded access to any Protected Material by reason of this Order shall disclose the Protected Material to anyone not specifically authorized to receive such information pursuant to the terms of this Order. Nor shall such persons use the Protected Material in any manner inconsistent with this Order. All persons afforded access to Protected Material pursuant to this Order shall keep the Protected Material secure in accordance with the purposes and intent of this Order and shall adopt all reasonable precautions to assure continued confidentiality, including precautions against unauthorized copying, use, or disclosure thereof.

5. Scope of Order:

The parties to this case retain the right to challenge whether a document or information is in fact Protected Material. This Order is not intended to and shall not be used as a precedent for any purposes in any other proceeding, nor does it alter any applicable burden of proof or persuasion pursuant to the laws of the State of Michigan in a dispute over whether materials qualify for protection.

A party seeking or intending to disclose in or on the public record information taken directly from materials identified as Protected Material must – before actually disclosing the information – do one of the following: (a) contact DTE Electric's counsel of record and obtain written permission to place the information in the public record, (b) take affirmative steps to confirm and actually confirm that the information is otherwise public information and within an exclusion in section 7 of this Order and comply with the notice provisions in section 7, or (c) challenge the confidential nature of the Protected Material and obtain a ruling under section 10 that the information is not confidential and may be disclosed in or on the public record.

6. Retention of Documents:

(A) Within sixty (60) days of completion of these proceedings, including any administrative or judicial review, all documents containing Protected Material provided under the terms of this Order, including all copies of those documents and any notes or other materials prepared by or for a Party, shall be returned to DTE Electric or destroyed. The obligation to return or destroy Protected Material shall be satisfied by these acts and filing of an affidavit that the Protected Material has been returned and/or destroyed. Counsel for the requesting Party or Parties may maintain a single confidential file of Protected Material subject to all other provisions in this Order. If the Protected Material is relevant or reasonably calculated to lead to admissible evidence

in a future Commission case, then it may be used subject to the issuing of a new protective order in that case. Counsel for the requesting Party or Parties shall have the right to retain copies of the pleadings, orders, transcripts, briefs, comments, and exhibits in these proceedings, but this Order will continue in effect with respect to the Protected Material contained in these documents.

(B) Even if no longer engaged in this case, every person who signed a Nondisclosure Certificate shall continue to be bound by it and this Order. The obligations of this Order shall not be reduced or extinguished by entry of a final order in this case, and shall be enforceable before the Commission and in a court of competent jurisdiction. To the extent Protected Material is not returned or destroyed, it shall remain subject to this Order.

7. Inapplicability:

The obligations of this Order shall not apply if the Protected Material:

(1) is or has become available to the public through no fault of the Party or Reviewing Representative, and no breach of this Order; or is otherwise lawfully known by the Party without any obligation to hold it in confidence;

(2) is required by law or regulation to be disclosed, but only to the extent and for the purposes of such required disclosure, or is submitted to a regulatory commission, agency or court of competent jurisdiction under a protective agreement or order; and

(3) is disclosed in response to a valid order of a court of competent jurisdiction or governmental body, but only to the extent of and for the purposes of such order, and only if the recipient of the order first notifies DTE Electric to seek an appropriate protective order.

However, before disclosing a particular document or portion of a document as described above, the Party must first provide DTE Electric with reasonable notice of not less than five (5) business

days (best efforts) of its assertion that the document or portion of a document should not be subject to this Protective Order for any of the reasons above. The obligations of this Order shall not apply to any document or portion of a document that is approved for release by written authorization from DTE Electric, but only to the extent of such authorization;

8. Violation of Order:

If a Party or person subject to this Order fails to maintain the confidentiality of Protected Material or otherwise violates this Order, the Commission (or the presiding officer, subject to review by the Commission as provided in R792.10433 of the Commission's rules of practice and procedure or its successor rule) may impose sanctions upon the offending Party or person as deemed appropriate under the circumstances, which may include but are not limited to sanctions permitted under applicable provisions of the Michigan Court Rules.

Should a Party or any other person who has properly obtained access to Protected Material under this Order violate any of its terms, the violating Party or person must (a) immediately convey the fact of the violation to DTE Electric and to the Commission, and (b) immediately notify the Commission, presiding officer, and DTE Electric in writing of the identity of all persons known or reasonably suspected as having obtained Protected Material through any disclosure. Further, if the violation is improper disclosure of Protected Material, then the offending Party or person must take all necessary steps to remedy the improper disclosure or use.

A Party or other person who breaches this Order remains subject to sanctions regardless of whether DTE Electric could have discovered the violation earlier than when it was actually discovered. Also, the sanctions for any violation of this order apply to inadvertent or accidental violations, as well as intentional violations.

This Order does not limit any other rights and remedies available to DTE Electric at law or equity against any Party or person using Protected Material in a manner contrary to this Order.

9. FOIA Request:

The Protected Material subject to this Order shall be shielded from disclosure to the extent permitted by law. If any person files a FOIA request with the Commission seeking access to documents subject to this Order, then the Commission's Executive Secretary shall notify DTE Electric as soon as reasonably practicable and DTE Electric may take whatever legal actions it deems appropriate to protect the Protected Material from disclosure. If the Commission decides to deny a claim of confidentiality, in whole or in part, then the Commission shall give notice to DTE Electric at least five (5) business days prior to the Commission's contemplated disclosure in response to the request. The notice shall briefly explain why DTE Electric's objections to disclosure were not sustained by the Commission. In the event that the FOIA requester commences suit against the Commission to compel disclosure of a document for which privilege is claimed, the Commission shall immediately notify DTE Electric of the suit.

10. Termination of Protected Status:

Except with respect to Protected Material specifically required by this Order to be exempted from disclosure under FOIA, and determinations made under section 1 (D) and (E) that carry their own requirements, the Commission or any presiding officer designated by it may subsequently declare that the protected status of specifically identified Protected Material should not be continued and immediately communicate that declaration to the parties in writing. If the presiding officer makes the foregoing declaration, then this Order shall cease to apply to that specifically identified Protected Material unless, within ten (10) days, any party files a pleading with notice of hearing asserting that the information should continue to be protected and set forth

the basis for that assertion. The movant shall bear the burden of proving that the asserted Protected Material is entitled to continuing protection from disclosure. If the presiding officer finds at such hearing that an asserted Protected Material no longer qualifies for treatment as Protected Material, then it shall remain subject to the protection afforded by this Order only if the movant files an appeal to the Commission within (7) days following the issuance of the presiding officer's ruling and shall remain subject to such protection until the issuance of the Commission's order on such ruling. Any party opposing such appeal shall file their answer with the Commission within seven (7) days after the filing and service of the appeal. If the Commission affirms the presiding officer's ruling, then the asserted Protected Material shall continue to qualify for treatment as Protected Material for an additional 21 days after the issuance of the Commission's above order.

MICHIGAN ADMINISTRATIVE HEARING SYSTEM
For the Michigan Public Service Commission

_____

Administrative Law Judge

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Confidential Workpapers Requiring License for Strategist

No.	WP#	File Name
1	LKM-801	WP LKM -801 BAU - FLAT HIGH COST - 1.5 EWR.SAV
2	LKM-802	WP LKM -802 BAU - FLAT HIGH COST - 1.75 EWR.SAV
3	LKM-803	WP LKM -803 BAU - FLAT HIGH COST - 100 PCT CH RETURN -2.0 EWR.SAV
4	LKM-804	WP LKM -804 BAU - FLAT HIGH COST - 2.0 EWR.SAV
5	LKM-805	WP LKM -805 BAU - FLAT HIGH COST - 2.25 EWR.SAV
6	LKM-806	WP LKM -806 BAU - FLAT HIGH COST - 2.5 EWR.SAV
7	LKM-807	WP LKM -807 BAU - FLAT HIGH COST - 25 PCT CH CAP - 1.5 EWR.SAV
8	LKM-808	WP LKM -808 BAU - FLAT HIGH COST - 25 PCT CH CAP - 1.75 EWR.SAV
9	LKM-809	WP LKM -809 BAU - FLAT HIGH COST - 25 PCT CH CAP - 2.0 EWR.SAV
10	LKM-810	WP LKM -810 BAU - FLAT HIGH COST - 25 PCT CH CAP - 2.25 EWR.SAV
11	LKM-811	WP LKM -811 BAU - FLAT HIGH COST - 25 PCT CH CAP - 2.5 EWR.SAV
12	LKM-812	WP LKM -812 BAU - FLAT HIGH COST - 50 PCT CH RETURN -2.0 EWR.SAV
13	LKM-813	WP LKM -813 BAU - FLAT HIGH COST - CT ONLY -1.5 EWR.SAV
14	LKM-814	WP LKM -814 BAU - FLAT HIGH COST - HI GAS -1.5 EWR.SAV
15	LKM-815	WP LKM -815 BAU - FLAT HIGH COST - HI GAS -1.75 EWR.SAV
16	LKM-816	WP LKM -816 BAU - FLAT HIGH COST - HI GAS -2.0 EWR.SAV
17	LKM-817	WP LKM -817 BAU - FLAT HIGH COST - HI GAS -2.25 EWR.SAV
18	LKM-818	WP LKM -818 BAU - FLAT HIGH COST - HI GAS -2.5 EWR.SAV
19	LKM-819	WP LKM -819 BAU - FLAT HIGH COST - HI LOAD -2.0 EWR.SAV
20	LKM-820	WP LKM -820 BAU - FLAT HIGH COST DR ONLY RUN - 2.0 EWR.SAV
21	LKM-821	WP LKM -821 BAU - FLAT HIGH COST MKT PURCHASE RUN - 2.0 EWR.SAV
22	LKM-822	WP LKM -822 BAU - TIERED COST - 1.5 EWR.SAV
23	LKM-823	WP LKM -823 BAU - TIERED COST - 1.75 EWR.SAV
24	LKM-824	WP LKM -824 BAU - TIERED COST - 2.0 EWR.SAV
25	LKM-825	WP LKM -825 BAU - TIERED COST - 2.25 EWR.SAV
26	LKM-826	WP LKM -826 BAU - TIERED COST - 2.5 EWR.SAV
27	LKM-827	WP LKM -827 BAU PCA A.SAV
28	LKM-828	WP LKM -828 BAU PCA B.SAV
29	LKM-829	WP LKM -829 BAU PCA C.SAV
30	LKM-830	WP LKM -830 BAU PCA D.SAV
31	LKM-831	WP LKM -831 EP - FLAT HIGH COST - 1.5 EWR.SAV
32	LKM-832	WP LKM -832 EP - FLAT HIGH COST - 1.75 EWR.SAV
33	LKM-833	WP LKM -833 EP - FLAT HIGH COST - 2.0 EWR.SAV
34	LKM-834	WP LKM -834 EP - FLAT HIGH COST - 2.25 EWR.SAV
35	LKM-835	WP LKM -835 EP - FLAT HIGH COST - 2.5 EWR.SAV
36	LKM-836	WP LKM -836 EP - FLAT HIGH COST - 50 PCT CO2 REDUCTION 1.5 EWR.SAV
37	LKM-837	WP LKM -837 EP - FLAT HIGH COST - 50 PCT CO2 REDUCTION 1.75 EWR.SAV
38	LKM-838	WP LKM -838 EP - FLAT HIGH COST - 50 PCT CO2 REDUCTION 2.0 EWR.SAV

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Confidential Workpapers Requiring License for Strategist

39	LKM-839	WP LKM -839 EP - FLAT HIGH COST - 50 PCT CO2 REDUCTION 2.25 EWR.SAV
40	LKM-840	WP LKM -840 EP - FLAT HIGH COST - 50 PCT CO2 REDUCTION 2.5 EWR.SAV
41	LKM-841	WP LKM -841 EP - FLAT HIGH COST - HI GAS -1.5 EWR.SAV
42	LKM-842	WP LKM -842 EP - FLAT HIGH COST - HI GAS -1.75 EWR.SAV
43	LKM-843	WP LKM -843 EP - FLAT HIGH COST - HI GAS -2.0 EWR.SAV
44	LKM-844	WP LKM -844 EP - FLAT HIGH COST - HI GAS 2.25 EWR.SAV
45	LKM-845	WP LKM -845 EP - FLAT HIGH COST - HI GAS -2.5 EWR.SAV
46	LKM-846	WP LKM -846 EP - FLAT HIGH COST - HI LOAD -1.5 EWR.SAV
47	LKM-847	WP LKM -847 EP - FLAT HIGH COST - HI LOAD -1.75 EWR.SAV
48	LKM-848	WP LKM -848 EP - FLAT HIGH COST - HI LOAD -2.0 EWR.SAV
49	LKM-849	WP LKM -849 EP - FLAT HIGH COST - HI LOAD -2.25 EWR.SAV
50	LKM-850	WP LKM -850 EP - FLAT HIGH COST - HI LOAD -2.5 EWR.SAV
51	LKM-851	WP LKM -851 EP - FLAT HIGH COST DR ONLY RUN - 1.75 EWR.SAV
52	LKM-852	WP LKM -852 EP - FLAT HIGH COST MKT PURCHASE RUN - 1.75 EWR.SAV
53	LKM-853	WP LKM -853 EP - TIERED COST - 1.5 EWR.SAV
54	LKM-854	WP LKM -854 EP - TIERED COST - 1.75 EWR.SAV
55	LKM-855	WP LKM -855 EP - TIERED COST - 2.0 EWR.SAV
56	LKM-856	WP LKM -856 EP - TIERED COST - 2.25 EWR.SAV
57	LKM-857	WP LKM -857 EP - TIERED COST - 2.5 EWR.SAV
58	LKM-858	WP LKM -858 EP PCA A.SAV
59	LKM-859	WP LKM -859 EP PCA B.SAV
60	LKM-860	WP LKM -860 EP PCA C.SAV
61	LKM-861	WP LKM -861 EP PCA D.sav
62	LKM-862	WP LKM -862 ET - FLAT HIGH COST - 1.75 EWR BR RETIRE.SAV
63	LKM-863	WP LKM -863 ET - FLAT HIGH COST - 2.0 EWR BR RETIRE PURCH TILL 2029.SAV
64	LKM-864	WP LKM -864 ET - FLAT HIGH COST - 2.0 EWR BR RETIRE PURCH TILL 2040.SAV
65	LKM-865	WP LKM -865 ET - FLAT HIGH COST - 2.0 EWR BR RETIRE.SAV
66	LKM-866	WP LKM -866 ET - FLAT LOW COST - 1.5 EWR.SAV
67	LKM-867	WP LKM -867 ET - FLAT LOW COST - 1.75 EWR.SAV
68	LKM-868	WP LKM -868 ET - FLAT LOW COST - 1.75 EWR-SOLAR BATTERY NOT TIED.SAV
69	LKM-869	WP LKM -869 ET - FLAT LOW COST - 1.75 EWR-SOLAR BATTERY TIED.SAV
70	LKM-870	WP LKM -870 ET - FLAT LOW COST - 2.0 EWR.SAV
71	LKM-871	WP LKM -871 ET - FLAT LOW COST - 2.25 EWR.SAV
72	LKM-872	WP LKM -872 ET - FLAT LOW COST - 2.5 EWR.SAV
73	LKM-873	WP LKM -873 ET - FLAT LOW COST - 9 PCT DISC. RATE - 1.5 EWR.SAV
74	LKM-874	WP LKM -874 ET - FLAT LOW COST - 9 PCT DISC. RATE - 1.75 EWR.SAV
75	LKM-875	WP LKM -875 ET - FLAT LOW COST - 9 PCT DISC. RATE - 2.0 EWR.SAV
76	LKM-876	WP LKM -876 ET - FLAT LOW COST - HI GAS -1.5 EWR.SAV
77	LKM-877	WP LKM -877 ET - FLAT LOW COST - HI GAS -1.75 EWR.SAV

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78	LKM-878	WP LKM -878 ET - FLAT LOW COST - HI GAS -2.0 EWR.SAV
79	LKM-879	WP LKM -879 ET - FLAT LOW COST - HI GAS -2.25 EWR.SAV
80	LKM-880	WP LKM -880 ET - FLAT LOW COST - HI GAS -2.5 EWR.SAV
81	LKM-881	WP LKM -881 ET - FLAT LOW COST - HI LOAD -2.0 EWR.SAV
82	LKM-882	WP LKM -882 ET - FLAT LOW COST - WIND CONGESTION RATIO - 1.75 EWR.SAV
83	LKM-883	WP LKM -883 ET - FLAT LOW COST DR ONLY RUN - 2.0 EWR.SAV
84	LKM-884	WP LKM -884 ET - FLAT LOW COST MKT PURCHASE RUN - 2.0 EWR.SAV
85	LKM-885	WP LKM -885 ET PCA A.SAV
86	LKM-886	WP LKM -886 ET PCA B.SAV
87	LKM-887	WP LKM -887 ET PCA C.SAV
88	LKM-888	WP LKM -888 ET PCA D.SAV
89	LKM-889	WP LKM -889 REFERENCE - PCA A.SAV
90	LKM-890	WP LKM -890 REFERENCE - TIERED -5 PCT DISC. RATE - 1.5 EWR.SAV
91	LKM-891	WP LKM -891 REFERENCE - TIERED -5 PCT DISC. RATE - 1.75 EWR.SAV
92	LKM-892	WP LKM -892 REFERENCE - TIERED -5 PCT DISC. RATE - 2.0 EWR.SAV
93	LKM-893	WP LKM -893 REFERENCE - TIERED COST DR ONLY RUN - 1.5 EWR.SAV
94	LKM-894	WP LKM -894 REFERENCE - TIERED COST MKT PURCHASE RUN - 1.5 EWR.SAV
95	LKM-895	WP LKM -895 REFERENCE -FLAT HIGH COST- 1.5 EWR.SAV
96	LKM-896	WP LKM -896 REFERENCE -FLAT HIGH COST- 1.75 EWR.SAV
97	LKM-897	WP LKM -897 REFERENCE -FLAT HIGH COST- 2.0 EWR.SAV
98	LKM-898	WP LKM -898 REFERENCE -FLAT HIGH COST- 2.25 EWR.SAV
99	LKM-899	WP LKM -899 REFERENCE -FLAT HIGH COST- 2.5 EWR.SAV
100	LKM-900	WP LKM -900 REFERENCE PCA B.SAV
101	LKM-901	WP LKM -901 REFERENCE PCA C.SAV
102	LKM-902	WP LKM -902 REFERENCE PCA D.SAV
103	LKM-903	WP LKM -903 REFERENCE TIERED COST - 1.75 EWR BR SENSITIVITY PURC 2029.SAV
104	LKM-904	WP LKM -904 REFERENCE TIERED COST - 1.75 EWR BR SENSITIVITY PURC 2040.SAV
105	LKM-905	WP LKM -905 REFERENCE TIERED COST - 1.75 EWR BR SENSITIVITY.SAV
106	LKM-906	WP LKM -906 REFERENCE TIERED COST - 2.0 EWR BR SENSITIVITY.SAV
107	LKM-907	WP LKM -907 REFERENCE -TIERED COST - HI CO2 - 1.5 EWR.SAV
108	LKM-908	WP LKM -908 REFERENCE -TIERED COST - HI CO2 - 1.75 EWR.SAV
109	LKM-909	WP LKM -909 REFERENCE -TIERED COST - HI CO2 - 2.0 EWR.SAV
110	LKM-910	WP LKM -910 REFERENCE -TIERED COST - HI CO2 - 2.25 EWR.SAV
111	LKM-911	WP LKM -911 REFERENCE -TIERED COST - HI CO2 - 2.5 EWR.SAV
112	LKM-912	WP LKM -912 REFERENCE -TIERED COST - SENSITIVITY N (High Case).SAV
113	LKM-913	WP LKM -913 REFERENCE -TIERED COST - SENSITIVITY N (starting point).SAV
114	LKM-914	WP LKM -914 REFERENCE -TIERED COST- 1.5 EWR (Starting point).SAV
115	LKM-915	WP LKM -915 REFERENCE -TIERED COST- 1.75 EWR.SAV

ATTACHMENT 1 – Page 4 of 4

Confidential Workpapers Requiring License for Strategist

116	LKM-916	WP LKM -916 REFERENCE -TIERED COST- 2.0 EWR.SAV
117	LKM-917	WP LKM -917 REFERENCE -TIERED COST- 2.25 EWR.SAV
118	LKM-918	WP LKM -918 REFERENCE -TIERED COST- 2.5 EWR.SAV
119	LKM-919	WP LKM -919 REFERENCE -TIERED COST- HI LOAD - 1.5 EWR.SAV
120	LKM-920	WP LKM -920 REFERENCE -TIERED COST- HI PEV -1.5 EWR.SAV

ATTACHMENT 2 – Page 1 of 1

Confidential Workpaper Requiring License For Promod

No.	WP#	Scenario	Run
1	LKM-1000	Emerging Technology	Retirement Sensitivity 1
2	LKM-1001	Emerging Technology	Retirement Sensitivity 2
3	LKM-1002	Emerging Technology	Starting Point
4	LKM-1003	Business As Usual	PCA A
5	LKM-1004	Business As Usual	PCA B
6	LKM-1005	Business As Usual	PCA C
7	LKM-1006	Business As Usual	PCA D
8	LKM-1007	Emerging Technology	PCA A
9	LKM-1008	Emerging Technology	PCA B
10	LKM-1009	Emerging Technology	PCA C
11	LKM-1010	Emerging Technology	PCA D
12	LKM-1011	Environmental Policy	PCA A
13	LKM-1012	Environmental Policy	PCA B
14	LKM-1013	Environmental Policy	PCA C
15	LKM-1014	Environmental Policy	PCA D
16	LKM-1015	Reference	PCA A
17	LKM-1016	Reference	PCA B
18	LKM-1017	Reference	PCA C
19	LKM-1018	Reference	PCA D
20	LKM-1019	Reference	Starting Point

ATTACHMENT 3 – Page 1 of 1

Confidential Workpapers No License Required

No.	Witness	WP #	Relevant Facility	Filename
1	Pratt	RCP-17	Belle River Peakers	SEMCO BR Pkr Transportation Agreement
2	Pratt	RCP-18	Dean	DTE Gas Dean Storage-Balancing
3	Pratt	RCP-19	Dean	DTE Gas Dean Transportation
4	Pratt	RCP-20	Dearborn CHP	F11523 DTE Gas Dearborn CHP Transportation and CRF
5	Pratt	RCP-21	Delray	DTE Gas Delray Contract
6	Pratt	RCP-22	Greenwood	SEMCO Greenwood Transportation Agreement
7	Pratt	RCP-23	Greenwood	SEMCO Greenwood Transportation Agreement 1st Amendment
8	Pratt	RCP-24	Greenwood	SEMCO Greenwood Transportation Agreement 2nd Amendment
9	Pratt	RCP-25	Greenwood	SEMCO Greenwood Transportation Agreement 3rd Amendment
10	Pratt	RCP-26	Renaissance	14_0820 DTE Gas Renaissance Agreement
11	Pratt	RCP-27	River Rouge	DTE Gas Master EUT Contract
12	Pratt	RCP-28	River Rouge	DTE Gas River Rouge Contract
13	Mikulan	LKM-2	N/A	Support for Exhibit A-6
14	Mikulan	LKM-81	N/A	Support for Exhibit A-7

ATTACHMENT 4

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the Application of	)	
DTE ELECTRIC COMPANY for	)	
approval of its Integrated Resource Plan	)	
pursuant to MCL 460.6t, and for other relief	)	Case No. U-20471

NON-DISCLOSURE CERTIFICATE

I hereby certify my understanding and agreement that access to Protected Material is provided to me pursuant to the Protective Order issued in Case No. U-20471. I have been given a copy of that Protective Order and have read it, and I agree to be bound by its terms and restrictions. I understand that DTE Electric Company maintains that Protected Material, as defined in the Protective Order, includes information that is confidential, proprietary, or commercially sensitive. I understand that the Protected Material, including any notes or other memoranda, or any other form of information that copies or discloses Protected Material, shall be maintained as confidential, shall not be used or disclosed to anyone other than in accordance with that Protective Order, and shall not be used for any purpose other than in connection with Michigan Public Service Commission Case No. U-20471 as set forth in the Protective Order.

Date: _____ Reviewing Representative: _____

Title: _____

Representing: _____

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the Application of DTE ELECTRIC COMPANY for approval of its Integrated Resource Plan pursuant to MCL 460.6t, and for other relief	))))	Case No. U-20471

PROOF OF SERVICE

STATE OF MICHIGAN)
) ss
COUNTY OF WAYNE)

ESTELLA BRANSON, being duly sworn, deposes and says that on the 29th day of March, 2019, a copy of DTE Electric Company's Application and Testimony and Exhibits of Witnesses, Kevin L. Bilyeu, Judy W. Chang, Shawn D. Burgdorf, Keegan O. Farrell, Kelly A. Holmes, Jestin M. Hunnell, Markus B. Leuker, Barry J. Marietta, Laura Mikulan, Matthew T. Paul, Sharon G. Pfeuffer, Ryan C. Pratt, Terri L. Schroeder, Don Stanczak, and Yujia Zhou, was served upon the persons on the attached service list via e-mail.

Estella R. Branson Digitally signed by Estella R. Branson
Date: 2019.03.29 12:11:42 -04'00'

ESTELLA BRANSON

Subscribed and sworn to before
me this 29th day of March, 2019.

Lorri A. Hanner Digitally signed by Lorri A. Hanner
Date: 2019.03.29 12:12:42 -04'00'

Lorri A. Hanner, Notary Public
Wayne County, Michigan
My Commission Expires: 4-20-2020
Acting in Wayne County

SERVICE LIST
Case No: U-20471

MPSC STAFF
Steven D. Hughey
Michigan Public Service Commission
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