

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- 20713

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

1. (Name) Michigan Municipal Association for Utility Issues (MI-MAUI)
2. (Name)
3. (Name)
4. (Name)
5. (Name)
6. (Name)
7. (Name)

Name Valerie J.M. Brader
Address 3331 W. Big Beaver Rd.
Suite 109
City Birmingham State MI
Zip 48084 Phone (248) 677-1045
Email valerie@rivenoaklaw.com
Date 10/19/2020

Signature: Valerie Brader

☐ I am not an attorney

☒ I am an attorney whose:

Michigan Bar # is P- 66401

MI Bar # is: _____
(state)

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion, regarding the regulatory reviews, revisions, determination and/or approvals necessary for regulated electric providers to comply with Section 61 of 2016 PA 342.

U-20713

ALJ Martin D. Snider

**PETITION TO INTERVENE OF
MICHIGAN MUNICIPAL ASSOCIATION FOR UTILITY ISSUES**

1. The Michigan Municipal Association for Utility Issues ("MI-MAUI"), a Michigan non-profit corporation, seeks to intervene in this case under Rule 410(1) of the Commission's Rules of Practice and Procedure, R 792.10410(1).

2. MI-MAUI, which is a membership organization of Michigan municipalities, including a number that are customers of Detroit Edison (DTE), was formed to represent interests of, and provide technical assistance and education to, municipalities and other local government agencies in Michigan in matters involving regulated utilities, including state regulatory processes and direct business relationships with utilities.

3. As ratepayers, a number of MI-MAUI's member municipalities are potential customers of DTE's Voluntary Green Energy Program ("VGP"), and thus have a direct interest in the design, cost, and implementation of the VGP. *See* Affidavit of MI-MAUI Director Richard Bunch (Exhibit A).

4. Additionally, as governmental bodies, member municipalities have unique insights to offer as to the desires of their constituents, who are also customers of DTE.

5. As an organization with members who are customers of DTE and potential participants in the VGP, MI-MAUI should be granted intervention by right, because its members

would be directly affected by the outcome of this case. Specifically, because members of MI-MAUI are directly within the zone of interests that would be affected by the Commission's decision in this case, MI-MAUI has organizational standing. See, e.g., *Assoc. of Data Processing Service Orgs, Inc. v. Camp*, 297 US 150 (1970); *Drake v. Detroit Edison*, 453 F Supp 1123, 1129 (WD Mich 1978).

6. MI-MAUI would also be eligible for permissive intervention, because its members, as representative governments, can provide useful information and unique perspective regarding the desires and needs of their constituents.

7. MI-MAUI staff, as well as member municipalities and their staff have extensive knowledge and experience in the area of ratepayer advocacy. In addition, MI-MAUI has provided comments to the Commission in cases No. U-20147 and U-20697.

8. This petition to intervene is timely.

9. No other party adequately represents the interests of MI-MAUI and its members. While the City of Ann Arbor is a member of MI-MAUI and has intervened separately in this matter, it is not the only member of MI-MAUI that is a DTE customer. Moreover, MI-MAUI and the City of Ann Arbor have agreed to share counsel and coordinate to prevent any duplication of effort in this docket.

10. MI-MAUI requests that all notices and pleadings be served on:

Valerie J.M. Brader
Rivenoak Law Group, P.C.
3331 W. Big Beaver Rd., Ste. 109
Troy, MI 48084

valerie@rivenoaklaw.com; and
ecf@rivenoaklaw.com.

For the reasons outlined above, MI-MAUI respectfully requests that the Commission grant this petition to intervene and treat MI-MAUI as a party to this proceeding.

Dated: October 19, 2020

RIVENOAK LAW GROUP P.C.

By:

A handwritten signature in cursive script, reading "Valerie J.M. Brader".

Valerie J.M. Brader
Attorney for MI-MAUI
3331 W. Big Beaver Rd.
Suite 109
Birmingham, MI 48084
Telephone: (248) 677-1045
Email: valerie@rivenoaklaw.com
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STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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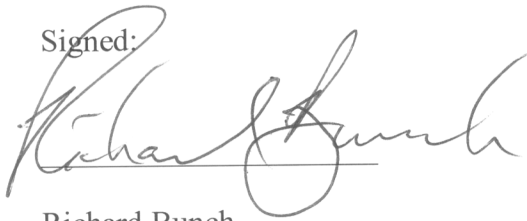
U-20713

ALJ Martin D. Snider

AFFIDAVIT OF RICHARD BUNCH

1. I, Richard Bunch, am the Director of the Michigan Municipal association for Utility Issues (MI-MAUI).
2. I have personal knowledge of the allegations in the MI-MAUI Petition to Intervene in this case.
3. The allegations in the Petition to Intervene are true to the best of my knowledge, information, and belief.
4. If called as a witness, I could competently testify to the facts in the Petition to Intervene.

Signed:

A handwritten signature in cursive script, appearing to read "Richard Bunch", written over a horizontal line.

Richard Bunch

__October 19, 2020__

Date

*Note: notarized version can be provided upon request; assuming HB 6729 is enacted into law, it is counsel's intent to replace this affidavit with a notarized version without further request.

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PROOF OF SERVICE

On the date below, an electronic copy of **Appearances of Valerie J.M. Brader on behalf of the Michigan Municipal Association for Utility Issues** was served on the following:

Name/Party	E-mail Address
Administrative Law Judge Martin D. Snider, ALJ	sniderM@michigan.gov
Counsel for DTE Electric Co. Lauren D. Donofrio Paula Johnson-Bacon	mpscfilings@dteenergy.com lauren.donofrio@dteenergy.com paula.bacon@dteenergy.com
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Counsel for Natural Resources Defense Council, Michigan Environmental Council Lydia Barbash-Riley Christopher M. Bzdok	lydia@envlaw.com chris@envlaw.com
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The statements above are true to the best of my knowledge, information and belief.

Dated: October 19, 2020

RIVENOAK LAW GROUP P.C.

By:

A handwritten signature in black ink, appearing to read "Valerie J.M. Brader". The signature is fluid and cursive, with the first name "Valerie" being the most prominent.

Valerie J.M. Brader
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