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March 24, 2020

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

RE: MPSC Docket No. U-20642

Dear Ms. Felice:

Enclosed herewith for filing in the above-referenced matter, please find the ***Direct Testimony of Bethany Allen and Geoffrey Rittmann*** on behalf of Retail Energy Supply Association, along with the corresponding Certificate of Service.

If you have any questions or concerns with the enclosed, please do not hesitate to contact me.

Very truly yours,

**Fraser Trebilcock Davis & Dunlap, P.C.**



Jennifer Utter Heston

JUH/ab  
Enclosures  
cc: All counsel of record

STATE OF MICHIGAN  
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

\*\*\*\*\*

In the matter of the application of )  
DTE GAS COMPANY for authority to )  
increase its rates, amend its rate schedules ) MPSC Case No. U-20642  
and rules governing the distribution and )  
supply of natural gas, and for miscellaneous )  
accounting authority )

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**DIRECT TESTIMONY OF BETHANY ALLEN**

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On behalf of the Retail Energy Supply Association

March 24, 2020

1 **I. INTRODUCTION AND PURPOSE OF TESTIMONY**

2 **Q. Please state your name and by whom you are employed.**

3 A. My name is Bethany Allen. I am employed by Interstate Gas Supply, Inc. (“IGS”) in the  
4 position of Regulatory Counsel. My business address is 6100 Emerald Parkway, Dublin,  
5 Ohio 43016.

6 **Q. Please describe your educational background and work history?**

7 A. I began my career in utility regulation as an intern in the Legal Department of the Public  
8 Utilities Commission of Ohio (“PUCO”) in 2014. After graduating from Capital  
9 University Law School with a Juris Doctorate in 2015, I accepted a role as a  
10 Commissioner Aide. In 2017, I was promoted to Chief Commission Aide serving under  
11 Chairman Asim Z. Haque. In this role, I advised the Chairman on the development of  
12 utility policy for the state of Ohio and collaborated with the Commissioners and attorney  
13 examiners in crafting the orders issued by the PUCO and the Ohio Power Siting Board.  
14 In 2018, I began my current role at IGS as Regulatory Counsel. My duties include  
15 monitoring energy policy in Michigan and California and representing IGS in  
16 proceedings before the PUCO regarding the supply of electricity and natural gas, as well  
17 as advanced technologies, such as distribution grid modernization and distributed energy  
18 resources. Additionally, I serve as the Chair of the Michigan Natural Gas Committee for  
19 the Retail Energy Supply Association (“RESA”).<sup>1</sup>

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<sup>1</sup> The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at [www.resausa.org](http://www.resausa.org).

1 **Q. On whose behalf are you filing testimony in this proceeding?**

2 A. I am filing testimony on behalf of RESA.

3 **Q. What is the purpose of your testimony?**

4 A. The purpose of my testimony is to address DTE Gas Company's ("DTE") gas demand  
5 response proposal.

6

7 **II. DTE'S DEMAND RESPONSE PROPOSAL**

8 **Q. Has DTE included a proposal for natural gas demand response in this proceeding?**

9 A. Yes. DTE is requesting approval of \$4 million in O&M expenses to fund a natural gas  
10 demand response pilot program for the 2020/2021 winter season.

11 **Q. Why is DTE proposing a demand response program?**

12 A. DTE witness Rajan M. Telang states that the proposal is in response to the Commission's  
13 order issued in Case No. U-20464 directing the Commission Staff to work with the  
14 utilities to propose natural gas demand response tariffs in the utilities' next gas rate cases  
15 filed after September 11, 2019. Telang Direct, pp. 12 & 25-26. To note, because the  
16 Commission specifically directed the utilities to propose these programs, my testimony  
17 does not opine on the role of a regulated utility in providing competitive services such as  
18 this one.

19 **Q. Did DTE submit proposed demand response tariffs in this case?**

20 A. No. DTE witness Telang indicates that the timing of DTE's rate case filing did not  
21 permit the filing of program details. He states, "details of the design of the pilot and the  
22 use of these funds are still in process at the time of filing of this rate case." Telang  
23 Direct, p. 26, ln. 1-3. He further states that "DTE Gas will continue to work with MPSC

1 Staff and other key stakeholders to implement a Demand Response pilot program . . .”  
2 Telang Direct, p. 26, ln. 3-4.

3 **Q. Is DTE seeking any other demand response related approvals?**

4 A. Yes. If the Commission declines to include DTE’s estimated \$4 million in demand  
5 response O&M expenses in this case, then DTE is seeking deferred accounting treatment  
6 for DTE’s actual demand response expenses for recovery in a future rate case. See,  
7 Uzenski Direct, pp. 4 & 47.

8

9 **III. RESA’S DEMAND RESPONSE CONCERNS & RECOMMENDATIONS**

10 **Q. Do you have any concerns with DTE’s demand response proposals?**

11 A. Yes, I have several concerns. To begin, DTE is seeking recovery of an estimated  
12 \$4 million in demand response O&M expense without providing any proposed program  
13 information. Absent program details, it is not possible to determine whether the proposed  
14 programs are prudent and proposed costs are reasonable.

15 Additionally, DTE states that it is working with “the MPSC Staff and other key  
16 stakeholders” on demand response program design. To date, RESA has not been  
17 consulted on any demand response program proposals nor invited to provide input on any  
18 program designs. RESA’s members serve a substantial number of DTE’s customers both  
19 in terms of numbers of customers and throughput.<sup>2</sup> RESA should be afforded an  
20 opportunity to provide input on any demand response program proposals before being  
21 approved for implementation.

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<sup>2</sup> As of March 2019, 152,071 residential and commercial customers representing 29,120 Bcf of annualized natural gas volumes is served by AGSs in DTE’s GCC program alone. See, [https://www.michigan.gov/documents/mpsc/choicepart\\_571570\\_7.pdf](https://www.michigan.gov/documents/mpsc/choicepart_571570_7.pdf)

1 Further, it is important that any demand response programs do not discriminate  
2 against gas customer choice (“GCC”) customers and end use transportation (“EUT”)  
3 customers. If GCC and EUT customers are paying for DTE’s demand response  
4 programs, then they should be able to participate. Conversely, if GCC and EUT  
5 customer cannot participate in DTE’s demand response programs, then they should not  
6 be required to pay for the costs of the programs.

7 Finally, an effective implementation of demand response programs for GCC and  
8 EUT customers is going to require good communication between the utility, the  
9 customers, and their suppliers to avoid system imbalances. If a customer is engaging in  
10 demand response, the customer’s supplier must be kept informed to avoid over-  
11 deliveries. An effectively designed program must include adequate notice to suppliers of  
12 the demand response directives and timely and accurate customer usage information.

13 **Q. What do you recommend?**

14 A. If the Commission remains committed to pursuing natural gas demand response  
15 programs, then I recommend that the Commission direct DTE to engage in open  
16 collaborative discussions on program design with a wide variety of interested  
17 stakeholders, including the MPSC Staff, customer groups, and suppliers all of whom will  
18 be impacted by any demand response program. Further, in order to avoid discriminatory  
19 treatment, the Commission should direct that any natural gas demand response pilot  
20 program include GCC and EUT customers. The Commission should further require that  
21 program tariffs must be submitted for the Commission’s review and interested parties  
22 should be afforded an opportunity to comment on any proposed programs prior to  
23 approval and implementation.

1 Q. Does that conclude your testimony?

2 A. Yes, it does.

STATE OF MICHIGAN  
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accounting authority )

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**DIRECT TESTIMONY OF GEOFFREY RITTIMANN**

---

On behalf of the Retail Energy Supply Association

March 24, 2020

1 **I. INTRODUCTION AND PURPOSE OF TESTIMONY**

2 **Q. Please state your name and by whom you are employed.**

3 A. My name is Geoffrey Rittimann. I am employed by Constellation NewEnergy in the  
4 position of Mass Markets Operations Analyst. My business address is 1001 Louisiana St,  
5 Suite 2300, Houston, TX 77002.

6 **Q. Please describe your educational background and work history?**

7 A. I received a Bachelor of Business Administration degree with concentrations in both  
8 Finance and Management from Hardin Simmons University in Abilene, Texas in May of  
9 2012. Currently I am employed as an operations analyst in Constellation's mass markets  
10 organization where I manage the entire order to cash flow process for both retail power  
11 and natural gas customers, and support our operational requirements with IT applications  
12 designed to better serve our customers. I have been in that position since July 2015.  
13 Prior to coming to Constellation, I held positions as a mortgage analyst in the banking  
14 industry and as a financial analyst for a private equity and fixed income consulting group.

15 **Q. On whose behalf are you filing testimony in this proceeding?**

16 A. I am filing testimony on behalf of the Retail Energy Supply Association ("RESA").<sup>1</sup>

17 **Q. What is the purpose of your testimony?**

18 A. The purpose of my testimony is to recommend that DTE Gas Company ("DTE") include  
19 a new provision in its gas customer choice ("GCC") and end use transportation ("EUT")

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<sup>1</sup> The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at [www.resausa.org](http://www.resausa.org).

1 program tariffs ensuring the provision of accurate, timely and reliable customer usage  
2 data by DTE to suppliers.

3  
4 **II. ACCURATE, TIMELY AND RELIABLE CUSTOMER USAGE INFORMATION.**

5 **Q. Have gas suppliers experienced problems getting accurate, timely and reliable**  
6 **customer usage information from DTE to serve GCC and EUT customers?**

7 A. Yes.

8 **Q. Please describe the problems that suppliers have been experiencing.**

9 A. Suppliers with customers in the GCC and EUT programs are reliant on DTE to read those  
10 customer meters, bill supplier commodity charges on the DTE invoices of GCC  
11 customers, and provide usage information to the supplier so that it can put invoice  
12 transaction information into its systems consistent with what was billed by the utility.  
13 When usage data is not sent to suppliers in an accurate, timely and reliable manner,  
14 suppliers have an extremely difficult job providing excellent customer service to their  
15 GCC and EUT customers. When usage data is delayed to a supplier, if any of the  
16 supplier's customers have a question related to their invoice, the supplier's customer care  
17 representatives are unable to view the information that appears on the customer invoice  
18 that has generated the customer's question. In these scenarios, the supplier must request  
19 that the customer provide to it a copy of the invoice so that it is able to research and  
20 resolve the customer inquiry. This not only delays quick resolution of the matter for the  
21 customer, as the supplier must wait until it receives a copy of the invoice from the  
22 customer, but for customers without readily available access to technology or resources  
23 to provide an invoice copy, this may not be an easy task. There are times the customer's

1 copy of the invoice is not received and the investigation is stymied, without the issue  
2 getting resolved on the account.

3 While ebill, or electronic billing, has the potential to mitigate this concern, ebill  
4 requires special authorization and individual access setup on a customer by customer  
5 basis. For a supplier, it becomes administratively burdensome to login separately to  
6 review each customer invoice.<sup>2</sup> When a supplier's customer care team does not have the  
7 information needed to service a customer, it results in an inferior customer experience.

8 In addition, the receipt of late usage data can also create tracking and performance  
9 issues for a supplier. Downstream functions such as accounting and supply are adversely  
10 impacted when suppliers do not have the needed information from DTE in order to run  
11 accounting, gas procurement, load forecasting and other business processes.

12 At any given time, I can have dozens and dozens of residential or small business  
13 GCC customers for whom I am missing usage or their usage data is highly suspicious.

14 **Q. Are there issues beyond delayed receipt of information from DTE?**

15 A. Yes, suppliers also struggle to provide satisfactory customer service when inaccurate data  
16 is sent by DTE. The process of correcting prior inaccurate data is referred to as  
17 Cancel/Rebill transactions. The first part of the process is to cancel the information that  
18 was inaccurate, and then issue a rebill based upon the correct data. When Cancel/Rebill  
19 transactions are sent for lengthy periods of time between the initial incorrect invoice and  
20 the corrected one, suppliers inevitably provide incorrect information on a customer  
21 account until the utility provides the correction. Cancel/Rebill transactions create  
22 duplicative actions when processing that strain supplier resources. Since early 2019,

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<sup>2</sup> It would be a substantial improvement if DTE would modify its system to allow a supplier to perform a search function under the supplier's regular login credential to view all its customer invoices for which customers have approved ebill access for the supplier.

1 Constellation has received over 400 GCC cancel transactions. One of our GCC accounts  
2 received 69 cancel transactions alone. In May 2019 we received cancel transactions for  
3 certain GCC customers that went back over two years to DTE's system conversion in  
4 April 2017. For 20 of those accounts, more than one cancel transaction occurred. For  
5 prospective customers there may also be financial impacts. When incorrect usage data is  
6 sent, a supplier may not be correctly pricing with the most competitive offer price  
7 available to that customer.

8 **Q. Can you please provide some specific examples?**

9 A. Certainly. In my role as a mass market analyst it is not uncommon for a customer  
10 account to be missing usage data for several consecutive months, to have a single month  
11 of missing data for a prior month occurring several months earlier, or in cases of new  
12 enrollments, for the supplier to not receive usage information for several months after the  
13 customer has first enrolled. While typically it takes several weeks to obtain the usage  
14 data when Constellation contacts DTE to initiate a GCC investigation, I am aware of  
15 customer accounts that took nearly two years for us to obtain the GCC customer usage  
16 information. This delay of information makes it virtually impossible to effectively serve  
17 our customers in a timely manner.

18 **Q. Does the receipt of accurate, timely and reliable customer usage information from**  
19 **DTE also impact C&I transportation customers?**

20 A. Yes. Constellation also experiences issues with data and timeliness for our gas  
21 transportation customers. DTE provides Constellation and other suppliers with the EUT  
22 Detailed Monthly Consumption Report ("Consumption Report"). Typically,  
23 Constellation receives transportation customer usage data from DTE via the Consumption

1 Report for the prior month on the 4<sup>th</sup> and 6<sup>th</sup> business days of the current month. For  
2 example, for usage from February 2020, Constellation received customer usage data from  
3 DTE on March 5<sup>th</sup> (the 4<sup>th</sup> business day) and on March 9<sup>th</sup> (the 6<sup>th</sup> business day). Most  
4 customer data is available on the Day 4 report, with Day 6 being the last Consumption  
5 Report received for that month. All customers are included on the report each day it is  
6 issued, but on the Day 4 report there is typically more missing customer data and less  
7 accuracy than on the Day 6 report. However, even on the Day 6 report missing and  
8 inaccurate data often remains, but because this is the last report received from DTE for  
9 the month, that is when Constellation begins its investigation of any remaining suspect  
10 usage data. Receiving usage data by Day 6 is an acceptable timeline if that data was  
11 accurate and reliable. However, each month there typically are accuracy issues with one  
12 out of every dozen transportation customer accounts.

13 **Q. Is it always the same customer accounts that are affected with inaccurate usage**  
14 **data, or do the inaccuracies occur across all customer accounts?**

15 A. It is not always the same customer accounts that are impacted each month. Inaccurate  
16 data can apply to different customers each month.

17 **Q. Has DTE explained these persistent data errors?**

18 A. The most common reason provided by DTE for inaccurate usage data is due to a meter  
19 issue or because the customer's meter has been exchanged or reset by DTE. In addition,  
20 on occasion Constellation just does not receive a final meter read from DTE for the  
21 month and, in those instances, we must manually request the meter's usage from the  
22 utility.

1 **Q. How do you determine whether usage data for a transportation customer is accurate**  
2 **or not?**

3 A. As mentioned, DTE provides Constellation and other suppliers with Consumption  
4 Reports. Suppliers must rely on meter reads provided by customers to learn about actual  
5 customer usage during the month. Suppliers seek customer usage information during the  
6 month to adjust subsequent customer deliveries to minimize transportation customer  
7 imbalances, effectively manage intramonth storage positions, and minimize customer  
8 costs. The first time suppliers receive any transportation customer usage data from DTE  
9 is after the month is complete. The usage information from the monthly DTE  
10 Consumption Report is then loaded into Constellation's systems, and in analyzing the  
11 individual customer meter usage and comparing it to total consumption, we search for  
12 any meters that show no usage or meters that appear to have inconsistencies in their  
13 usage values. When an anomaly appears, the analyst must contact DTE to notify DTE of  
14 the discrepancy. DTE then researches the matter which sometimes requires DTE to send  
15 a technician to physically check the meter. This process typically takes until the middle  
16 of the month, about day 16 to 20, before we are provided with accurate usage data or a  
17 corrected meter read and are finally able to update our systems with accurate data.

18 **Q. Do delays in obtaining accurate customer usage data have an impact on the**  
19 **customer's themselves?**

20 A. Definitely. When usage data is missing or suspect, during the time when the anomaly is  
21 identified and referred to the utility for resolution, Constellation is uncertain as to what  
22 the actual customer usage was during the prior month. That directly impacts the  
23 transportation customer's storage balance for the current month, as the actual usage from

1 the prior month, when it is eventually known, determines what the storage balance will be  
2 for the current month. Without clarity on the storage balance, it becomes very  
3 challenging to know how much gas to deliver during the current month so that you  
4 minimize costs for the customers and avoid tariff penalties. Penalty avoidance is a strong  
5 incentive because these penalties can be as much as \$10 per Dth plus the cost of gas at  
6 the highest published price throughout the entire month which can be rather punitive. If  
7 DTE does not quickly complete its investigation of the usage issue, the duration of the  
8 uncertainty regarding the correct storage balance is greater, magnifying the potential cost  
9 and penalty impacts the transportation customer is exposed to.

10 In addition, Constellation has also experienced time lags with DTE executing  
11 supplier-requested storage transfers between customers. We do not always receive timely  
12 confirmation from DTE that it has completed the transfer. During the interim, before we  
13 know that DTE has completed the transfer, transportation customers are exposed to  
14 penalty risk and there is the potential that rebilling will also be required. Rebilling  
15 creates additional work that would have been unnecessary if timely confirmation  
16 occurred.

17 Finally, the greater the frequency and magnitude of inaccurate or missing usage  
18 data, the more resources required by suppliers to identify and resolve these issues and the  
19 increased likelihood that less than optimal decisions are made with incomplete or  
20 inaccurate information that all contribute to higher costs and lower customer satisfaction.

1 **Q. Why is it important for suppliers to receive accurate, timely and reliable usage**  
2 **information from DTE?**

3 A. In a competitive industry, customer service is a top priority for many suppliers. When  
4 DTE provides inaccurate, delayed, and unreliable usage data, suppliers cannot provide  
5 timely answers to customer billing questions or quickly resolve customer inquiries. With  
6 inaccurate data from DTE, the supplier may misinform the customer or even be unable to  
7 provide the best pricing possible for that customer.

8 **Q. Do the terms and conditions of DTE's GCC and EUT programs currently ensure**  
9 **that gas suppliers receive accurate, timely and reliable usage information from**  
10 **DTE?**

11 A. No. Neither DTE's GCC or EUT tariffs, the Commission's rules, nor state statute  
12 requires DTE to provide suppliers with accurate, timely and reliable customer usage  
13 information.

14 **Q. Why is it important to include such a provision in DTE's tariffs?**

15 A. If such a requirement were included in DTE's GCC and EUT program tariffs, and DTE's  
16 fails to provide accurately, timely or reliable information for an extended period going  
17 forward, then suppliers would have a basis for sustaining a complaint with the  
18 Commission. The Commission would have an opportunity to review DTE's conduct and  
19 order appropriate remedies where warranted.

20 **Q. What do you recommend for DTE's EUT program?**

21 A. DTE's EUT program tariffs are divided into two parts. Part I is for EUT service. Part II  
22 is for off-system storage and transportation service. For Part I, I recommend that the

1 Commission direct DTE to include the following provision in Section E2. Records,  
2 Accounting and Control:

3 E2.3 Customer Data.

4  
5 The Company will provide the Customer, or its designated agent, with  
6 accurate individual customer consumption data no later than 6 business  
7 days after the conclusion of the month.

8  
9 For Part II, I recommend that the Commission direct DTE to include the following  
10 provision in Section E16. Records, Accounting and Control:

11 E16.2 Customer Data.

12  
13 The Company will provide the Customer, or its designated agent, with  
14 accurate individual customer usage data no later than 6 business days after  
15 the conclusion of the month.

16  
17 **Q. What do you recommend for DTE's GCC program?**

18 A. I recommend that the Commission direct DTE to include the following provision in the  
19 F1 General Provisions section of DTE's tariff:

20 F.1.23 The Company will provide the Supplier with accurate individual  
21 customer consumption data on a monthly basis no later than 5 business  
22 days after the conclusion of the customer's billing month.

23  
24 **Q. Does that conclude your testimony?**

25 A. Yes, it does.

STATE OF MICHIGAN

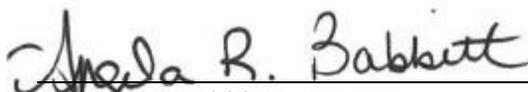
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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and rules governing the distribution and )  
supply of natural gas, and for miscellaneous )  
accounting authority )  
\_\_\_\_\_ )

Case No. U-20642

CERTIFICATE OF SERVICE

Angela R. Babbitt hereby certifies that on the 24<sup>th</sup> day of March, 2020, she served the *Direct Testimony of Bethany Allen and Geoffrey Rittmann* on behalf of Retail Energy Supply Association, along with the corresponding Certificate of Service on the persons identified on the attached service list via electronic mail.

  
\_\_\_\_\_  
Angela R. Babbitt

## Service List for U-20642

### **Administrative Law Judge**

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