

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the Matter of the Application of	)	
THE DETROIT EDISON COMPANY for	)	Case No. U-12595
rate making authority to implement 2000 PA 141	)	
_____	)	

ENERGY MICHIGAN
PETITION FOR LEAVE TO INTERVENE

Now comes Energy Michigan by and through its counsel, Varnum, Riddering, Schmidt & HowlettLLP and hereby petitions this Commission to authorize Energy Michigan to intervene in these proceedings pursuant to the Michigan Public Service Commission (“Commission”) Rules of Practice and Procedure and the Michigan Administrative Procedures Act MCL §24.101 et seq. In support of this petition, Energy Michigan states as follows:

1. Energy Michigan is a Michigan nonprofit corporation which was formed to protect and promote the interests of producers and users of independent power. Its membership includes those interested in cogeneration, small power production, power marketing, independent power projects, large users of electricity located in the Detroit Edison electric service territory who would pay implementation costs and developers of independent power projects.

2. As a trade association for independent power producers and those interested in this industry (equipment vendors, fuel suppliers, engineering firms, energy users and marketers, project developers, units of government) Energy Michigan has been and continues to be interested in rate, and rate design issues particularly as they affect the rates paid by operators or hosts of generating plants for standby, supplemental and firm retail power. Energy Michigan participated in the most recent Detroit Edison general rate case U-10102 which established the currently effective Detroit Edison retail sales. In that case, Energy Michigan represented the interests of its members who purchase standby, supplemental and firm power from Detroit Edison.

Energy Michigan has also participated in recent Detroit Edison proceedings which covered development of the market for independent power capacity including Cases U-10143, U-10176, U-11452, U-11290 et al, U-10840, U-8869DE and U-9798. Finally, Energy Michigan is a party in

Case U-12478, the Detroit Edison securitization case, which is a companion case to this matter.

Energy Michigan members, as retail rate customers, potential Retail Open Access customers and Retail Access power providers who may purchase Open Access services including energy and capacity therefore, have a direct interest in the Detroit Edison rates and charges used to implement securitization.

3. On September 6, 2000 Detroit Edison filed an application with the Commission in U- 12595 seeking to obtain approval of tariff changes to implement securitization.

4. For the reasons stated above, Energy Michigan and its members have an interest in this matter because the Detroit Edison application will impact the rates paid by Energy Michigan members who are Detroit Edison retail customers and for Energy Michigan members who purchase power under Detroit Edison's Retail Open Access plan. It is and will be the position of Energy Michigan that Detroit Edison must allocate securitization savings in a competitively neutral manner and that inappropriate costs must not be securitized and that the subject matter of this case should be resolved in the context of Case U- 12478 as a tariff filing in conformance with the decision of the Commission in that case.

WHEREFORE, Energy Michigan prays that the Commission:

- a. Grant the Energy Michigan petition to intervene; and
- b. Grant such other and further relief as is deemed lawful and appropriate.

Respectfully submitted,

VARNUM, RIDDERING, SCHMIDT & HOWLETT LLP
Attorneys for Energy Michigan

Dated: September 18, 2000

By: 
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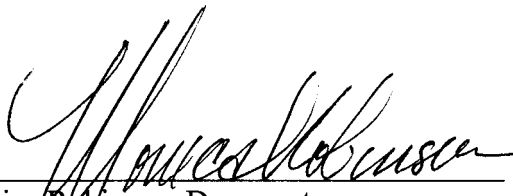
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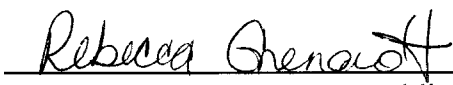
PROOF OF SERVICE

Monica Robinson, duly sworn, deposes and says that on this 18th day of September, 2000 she served the original and four copies of Energy Michigan's Petition to Intervene upon the MPSC, and a copy upon those individuals listed on the attached distribution list by e-mail and regular mail at their last known addresses.



Monica Robinson, Deponent

Subscribed and sworn to before me
this 18th day of September, 2000.



Rebecca Grenawalt, Notary Public
Ingham County, Michigan
My Commission Expires: July 12, 2001

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