



Julio C. Mazzoli
Chief Counsel - Litigation
Direct Dial (313) 436-9406

October 2, 2000

Ms. Dorothy Wideman
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way
Lansing, Michigan 48909-7721

Re: In the Matter of the Application of The Detroit Edison Company for rate
making authority to implement 2000 PA 141
MPSC Case No. U-12595

Dear Ms. Wideman:

Enclosed for filing in the above-referenced proceeding are an original and four (4) copies
of a Petition of CMS MS&T Michigan L.L.C. and CMS Marketing, Services and Trading
Company for Leave to Intervene together with a Proof of Service.

Very truly yours,

Julio C. Mazzoli

JCM/dml
Enclosures

cc: Parties of Record (w/Enclosures)

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

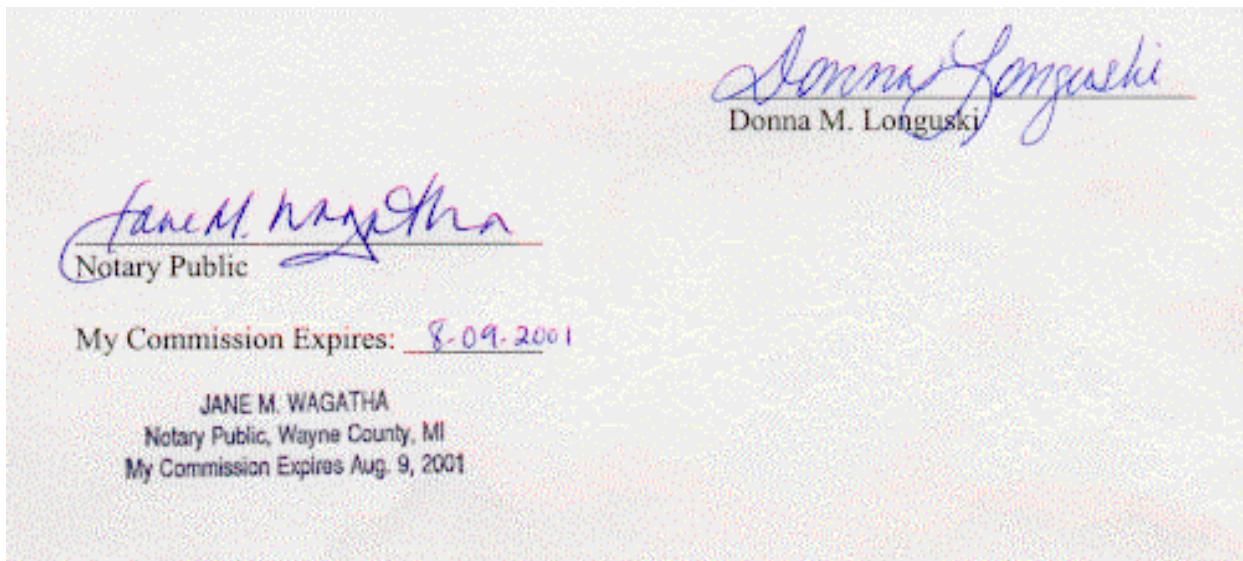
In the matter of the Application of)
THE DETROIT EDISON COMPANY)
for ratemaking authority to implement)
2000 PA 141.)
_____)

Case No. U-12595

PROOF OF SERVICE

STATE OF MICHIGAN)
)
COUNTY OF WAYNE)

Donna M. Longuski, being first duly sworn, deposes and says that she filed electronically a copy of "Petition of CMS MS&T Michigan L.L.C. and CMS Marketing, Services and Trading Company for Leave to Intervene" in the above docket on the persons identified on the attached service list by depositing the same on October 2, 2000, in the United States Mail with first-class postage thereon fully paid.



SERVICE LIST

MPSC Case No. U-12595

Attorney for Michigan Environmental Council and the Public Interest Research Group in Michigan

Don L. Keskey, Esq.
Knaggs, Harter, King & Brake, P.C.
1375 South Washington Avenue
Suite 300
Lansing, Michigan 48910
khblaw@voyager.net

Attorneys for the Attorney General

Donald E. Erickson, Esq.
Assistant Attorney General
Special Litigation Division
Michigan Attorney General Office
6520 Mercantile Way, Suite 2
P.O. Box 30218
Lansing, Michigan 48909
ericksond@ag.state.mi.us

Charles W. King, Esq.
Snaveley King Majoros O'Connor & Lee, Inc.
1220 L Street N.W.
Suite 410
Washington D.C. 20005

Attorney for Energy Michigan

Eric J. Schneidewind, Esq.
Vamum, Riddering, Schmidt & Howlett
LLP
The Victor Center
201 North Washington Square
Suite 810
Lansing, Michigan 48933
ejschneidewind@vrsh.com

Attorney for Plastipak Packaging, Inc.

Stewart A. Binke, Esq.
Howard & Howard
The Phoenix Building
222 North Washington Square
Suite 500
Lansing, Michigan 48933-1817
sbinke@howardandhoward.com

Attorney for Michigan Electric and Gas Association

Ronald W. Bloomberg, Esq.
Loomis, Ewert, Parsley, Davis & Gotting,
P.C.
232 South Capitol Avenue
Suite 1000
Lansing, Michigan 48933-1525
rwbloomberg@loomislaw.com

Attorneys for the Michigan Public Service Commission Staff

Larry G. Watterworth, Esq.
Steven D. Hughey, Esq.
Assistants Attorney General
Public Service Commission
6545 Mercantile Way
Suite 15
Lansing, Michigan 48911
watterworthl@ag.state.mi.us

Mr. Michel Hiser
Michigan Public Service Commission
6545 Merchantile Way
P.O. Box 30221
Lansing, Michigan 48909-7721
michel.l.hiser@cis.state.mi.us

Attorney for Detroit Edison

Bruce R. Maters, Esq.
The Detroit Edison Company
2000 Second Avenue
688 WCB
Detroit, Michigan 48226-1297
matersb@dteenergy.com

Attorney for Consumers Energy Company

John C Shea, Esq.
Consumers Energy Company
212 West Michigan Avenue
Jackson, Michigan 49201
jcshea@cmsenergy.com

Attorney for Bay Windpower, L.L.C.

Richard VanderVeen, III, Esq.
President and CEO
Bay Windpower, L.L.C.
2505 Robinson Road, S.E.
East Grand Rapids, Michigan 49506
vanderveenr@mjsc.com

Attorney for Unicorn Energy, Inc.

John M. Dempsey, Esq.
215 South Washington Square
Suite 200
Lansing, Michigan 48933
jdempsey@dickinson-wright.com

Attorney for Michigan Community Action Agency Association

Brian Coyer, Esq.
Knaggs, Hatter, King & Brake, P.C.
1375 South Washington Avenue
Suite 300
Lansing, Michigan 48910
khblaw@voyager.net

Attorneys for Midwest Independent Power Suppliers Coordination Group and PG&E Corporation

Michael S. Ashton, Esq.
Fraser, Trebilcock, Davis & Foster, P.C.
1000 Michigan National Tower
Lansing, Michigan 48933
mashton@ftdf.com

Attorneys for Michigan Chamber of Commerce, Dow Corning Corporation and Hemlock Semiconductor Corporation

David E. S. Marvin, Esq.
Fraser, Trebilcock, Davis & Foster, P.C.
1000 Michigan National Tower
Lansing, Michigan 48933
dmarvin@ftdf.com

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

Case No. U-12595

CMS MS&T Michigan L.L.C. (“MST Michigan”), a Michigan limited liability company, and CMS Marketing, Services and Trading Company (“MST”), a Michigan corporation, hereby petition to intervene in this proceeding pursuant to Rule 201 of the Commission’s Rules of Practice and Procedure, R460.17201. In support of their petition, MST Michigan and MST state:

2. MST Michigan has entered into Electricity Supply Agreements pursuant to which it will be meeting up to 400 MW of the operational electric energy needs of customers at the Rouge industrial complex in Dearborn, Michigan and elsewhere. MST Michigan, a wholly owned subsidiary of MST, was assigned the Electricity Supply Agreements by Dearborn Industrial Generation, L.L.C. (“DIG”), a wholly owned subsidiary of CMS Generation Co. DIG is constructing an electric generation facility (the “DIG Facility”) across from the Rouge complex in the City of Dearborn that will ultimately have a nominal electrical generating

capacity of approximately 710 MW. MST Michigan will meet its retail service obligations under the Electricity Supply Agreements by purchasing power at wholesale from DIG and from MST, a FERC authorized power marketer that will purchase wholesale power from other suppliers.

3. Electricity generated by the DIG Facility and consumed at the Rouge complex will not make use of The Detroit Edison Company's transmission and distribution system and will therefore meet the requirements for "self-service power" set forth in Act 141. Act 141 "does not impose a transition, implementation, exit fee, or any other similar charge on self-service power."

4. MST Michigan and MST have a substantial interest in this proceeding and The Detroit Edison Company's related filings in Case No. U-12489 and Case No. U-12478¹ based on the need to insure that none of the tariff changes contemplated in any of these proceedings are in any way inconsistent with the requirements of self-service power set forth in Act 141. In addition, The Detroit Edison Company states in its application in this proceeding that it does not intend to apply any securitization savings towards rate reductions to Customer Choice tariffs. MST and MST Michigan believe that securitization savings should be applied to Customer Choice tariffs as well. Thus, this proceeding may fundamentally affect the economic interests of MST Michigan and MST, both in MST Michigan's capacity as a provider of self-service power and in MST Michigan's and MST's capacity as alternative electric suppliers. MST Michigan and MST should therefore be permitted to intervene as parties to this proceeding.

¹ Simultaneous with this filing, MST and MST Michigan are filing a Petition to Intervene Out of Time in Case No. U-12478, and they intend to file a timely Petition to Intervene in Case No. U-12489.

WHEREFORE, MST Michigan and MST respectfully request that the Commission grant their Petition to Intervene and permit them to fully participate as parties in this proceeding. MST Michigan and MST further request that the parties mail copies of all future pleadings and correspondence in these proceedings to their counsel at the address listed below.

Respectfully submitted,

CMS MS&T MICHIGAN L.L.C. and
CMS MARKETING, SERVICES AND TRADING
COMPANY

Dated: October 2, 2000

By:

Julio C. Mazzoli (P58383)

Michael J. Sheridan (P41441)

CMS Enterprises Company

330 Town Center Drive, Suite 1000

Dearborn, Michigan 48126-2712

(313) 436-9406

Attorneys for CMS MS&T Michigan L.L.C. and
CMS Marketing, Services and Trading Company