

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of
CLOVERLAND ELECTRIC COOPERATIVE
for approval of its plan to implement
2000 PA 141.

Case No. **U-12656**

In the matter of the application of
MIDWEST ENERGY COOPERATIVE
for approval of its plan to implement
2000 PA 141.

Case No. **U-12657**

In the matter of the application of
CHERRYLAND ELECTRIC COOPERATIVE
for approval of plans to implement
2000 PA 141.

Case No. **U-12658**

In the matter of the application of
GREAT LAKES ENERGY COOPERATIVE
for approval of plans to implement
2000 PA 141.

Case No. **U-12659**

In the matter of the application of
PRESQUE ISLE ELECTRIC
& GAS CO-OP for approval of plans
to implement 2000 PA 141.

Case No. **U-12660**

In the matter of the application of
HOMEWORKS TRI-COUNTY ELECTRIC
COOPERATIVE for approval of plans
to implement 2000 PA 141.

Case No. **U-12661**

MICHIGAN PUBLIC SERVICE COMMISSION STAFF'S
MOTION TO COMPEL ANSWERS TO STAFF'S SECOND DISCOVERY REQUEST

The Michigan Public Service Commission Staff ("Staff"), pursuant to R 460.17335 and R 460.17317, files this motion to compel answers to discovery and in support states:

1. On March 9, 2001, the Michigan Public Service Commission Staff ("Staff") served Staff's Second Discovery Request on Cloverland Electric Cooperative in Case No. U-12656, Midwest Energy Cooperative in Case No. U-12657, Cherryland Electric Cooperative in Case No. U-12658, Great Lakes Energy Cooperative in Case No. U-12659, Presque Isle Electric & Gas Co-op in Case No. U-12660, and HomeWorks Tri-County Electric Cooperative in Case No. U-12661 (collectively "the Cooperatives"). Copies of these Second Requests are attached as Attachments A-F.

2. On March 16, 2000, counsel for the Cooperatives filed responses to Staff's Second Request, objecting to each inquiry on the basis that the request was not relevant, not likely to lead to the discovery of relevant information, overly broad, and unduly burdensome. A copy of the Cooperatives' Response is attached as Attachment G.

3. Contrary to the Cooperatives' claim, there is no basis for responding that information related to aggregation is "irrelevant." (See Staff's motion for summary disposition.)

4. Cooperatives made no attempt to provide the discovery by the requested deadline, nor did they attempt to seek an extension of time within which to comply with this Second Request through contact of counsel for Staff. Rather, Cooperatives simply made an unsubstantial claim that it would take "weeks" to compile the information. Staff would submit that this, standing alone, is insufficient grounds for a blanket refusal to comply with a valid discovery request.

5. Staff requires the answer to its requests in order to properly analyze the application in this case and in order to have time to submit follow-up questions if necessary prior to Staff making its filing in this matter.

WHEREFORE, Staff respectfully requests that the Administrative Law Judge order the Cooperatives to provide answers to Staff's Second Discovery Request.

Respectfully submitted,

**MICHIGAN PUBLIC SERVICE
COMMISSION STAFF**

A handwritten signature in black ink, appearing to read "Michael A. Nickerson", with a long horizontal flourish extending to the right.

Michael A. Nickerson (P25138)
Assistant Attorney General
Public Service Division
6545 Mercantile Way, Ste. 15
Lansing, MI 48911
Telephone: (517) 241-6680

Dated: April 9, 2001

2000064579A

ATTACHMENT A

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of
CLOVERLAND ELECTRIC COOPERATIVE
for approval of its plan to implement
2000 PA 141.

Case No. U-12656

**STAFF'S SECOND DISCOVERY REQUEST TO
CLOVERLAND ELECTRIC COOPERATIVE**

The Staff of the Michigan Public Service Commission by its attorney and pursuant to Rule 35 of the Commission Rules of Practice and Procedure, 1979 AC, R 460.45 and MCR 2.309 and 2.3 10, submits the following discovery request.

INSTRUCTIONS

- A. Each discovery request must be answered separately and fully in writing under oath, and should identify the person responsible for the answer.
- B. These requests are continuing and require further and supplemental responses if you receive or generate additional information within the scope of these requests between the time of the original responses and the close of the record in this case.
- C. With respect to any document or communication for which you claim a privilege, identify the document or communication, including the general subject matter, but not the substance, state the privilege involved and also state the factual and legal basis for the privilege.
- D. Please furnish the responses to these requests as soon as possible.

DISCOVERY REQUESTS

2-ST-1. Please provide a listing of all customers that presently have multiple, separately metered loads. Include for each customer: (a) the rate schedule under which each load is being billed and the effective date when the load started to be served under that rate; (b) the previous 12-month load in kW for each meter, and indicate (c) whether the loads are on the same land parcel, adjacent or contiguous parcels.

2-ST-2. Please provide a listing of all customers that presently have a single metered load, but some or all of that load was previously served via multiple, separate meters. Include for each customer: (a) the rate schedule under which the load is presently being billed, and the effective date when the load started to be served under that rate; (b) the rate schedules that the separate loads were previously billed under, and the beginning and ending dates when the loads were served under those rates; (c) the previous 12-month load in kW, and indicate (d) if the load is presently all on a single land parcel, or if the load is on more than one adjacent or contiguous parcels.

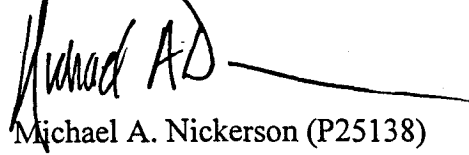
2-ST-3. Please provide a listing of all customers that presently have multiple, separately metered loads that are on adjacent or contiguous parcels, where the Cooperative treats each separately metered load as an individual customer, but the owner of the multiple, separately metered loads is the same person, firm, association, or corporation or any agency of the federal, state, county, or municipal government. Include for each customer: (a) the rate schedule under which each load is being billed and the effective date when the load started to be served under that rate; (b) the previous 12-month load in kW for each meter, and indicate (c) whether the loads are on the same land parcel, adjacent or contiguous parcels.

2-ST-4. Please provide a listing of all customers that presently have multiple, separately metered loads that are not on adjacent or contiguous parcels, where the Cooperative treats each separately metered load as an individual customer, but the owner of the multiple,

separately metered loads is the same person, firm, association, or corporation or any agency of the federal, state, county, or municipal government. Include for each customer: (a) the rate schedule under which each load is being billed and the effective date when the load started to be served under that rate; (b) the previous 12-month load in kW for each meter, and indicate (c) whether the loads are on the same land parcel, adjacent or contiguous parcels.

Respectfully submitted,

**MICHIGAN PUBLIC SERVICE
COMMISSION STAFF**

A handwritten signature in black ink, appearing to read "Michael A. Nickerson", followed by a horizontal line.

Michael A. Nickerson (P25138)
Assistant Attorney General
Public Service Division
6545 Mercantile Way, Ste. 15
Lansing, MI 48911
Telephone: (517) 241-6680

Dated: March 9, 2001

2000064579A

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of
CLOVERLAND ELECTRIC COOPERATIVE
for approval of its plan to implement
2000 PA 141.

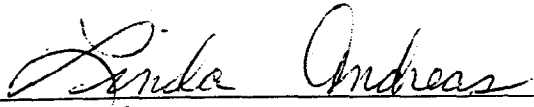
Case No. U-12656

PROOF OF SERVICE

STATE OF MICHIGAN)
)
COUNTY OF INGHAM)

Linda Andreas, being first duly sworn, deposes and says that on **March 9, 2001**, she served a true copy of **Michigan Public Service Commission Staff's Second Discovery Request to Cloverland Electric Cooperative** upon the following parties by depositing the same in a United States postal depository enclosed in an envelope bearing postage fully prepaid, plainly addressed as follows:

Albert Ernst
Dykema Gossett PLLC
800 Michigan National Tower
Lansing, MI 48933



Linda Andreas

Subscribed and sworn to before me
this 9th day of March, 2001.



Tina L. Bibbs, Notary Public
Ingham County, Michigan
My Commission Expires: 11/13/2003

ATTACHMENT B

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of
MIDWEST ENERGY COOPERATIVE
for approval of its plan to implement
2000 PA 141.

Case No. U-12657

**STAFF'S SECOND DISCOVERY REQUEST TO
MIDWEST ENERGY COOPERATIVE**

The Staff of the Michigan Public Service Commission by its attorney and pursuant to Rule 35 of the Commission Rules of Practice and Procedure, 1979 AC, R 460.45 and MCR 2.309 and 2.310, submits the following discovery request.

INSTRUCTIONS

- A. Each discovery request must be answered separately and fully in writing under oath, and should identify the person responsible for the answer.
- B. These requests are continuing and require further and supplemental responses if you receive or generate additional information within the scope of these requests between the time of the original responses and the close of the record in this case.
- C. With respect to any document or communication for which you claim a privilege, identify the document or communication, including the general subject matter, but not the substance, state the privilege involved and also state the factual and legal basis for the privilege.
- D. Please furnish the responses to these requests as soon as possible.

DISCOVERY REQUESTS

2-ST-1. Please provide a listing of all customers that presently have multiple, separately metered loads. Include for each customer: (a) the rate schedule under which each load is being billed and the effective date when the load started to be served under that rate; (b) the previous 12-month load in kW for each meter, and indicate (c) whether the loads are on the same land parcel, adjacent or contiguous parcels.

2-ST-2. Please provide a listing of all customers that presently have a single metered load, but some or all of that load was previously served via multiple, separate meters. Include for each customer: (a) the rate schedule under which the load is presently being billed, and the effective date when the load started to be served under that rate; (b) the rate schedules that the separate loads were previously billed under, and the beginning and ending dates when the loads were served under those rates; (c) the previous 12-month load in kW, and indicate (d) if the load is presently all on a single land parcel, or if the load is on more than one adjacent or contiguous parcels.

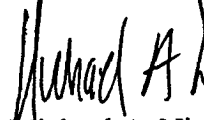
2-ST-3. Please provide a listing of all customers that presently have multiple, separately metered loads that are on adjacent or contiguous parcels, where the Cooperative treats each separately metered load as an individual customer, but the owner of the multiple, separately metered loads is the same person, firm, association, or corporation or any agency of the federal, state, county, or municipal government. Include for each customer: (a) the rate schedule under which each load is being billed and the effective date when the load started to be served under that rate; (b) the previous 12-month load in kW for each meter, and indicate (c) whether the loads are on the same land parcel, adjacent or contiguous parcels.

2-ST-4. Please provide a listing of all customers that presently have multiple, separately metered loads that are not on adjacent or contiguous parcels, where the Cooperative treats each separately metered load as an individual customer, but the owner of the multiple,

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Respectfully submitted,

**MICHIGAN PUBLIC SERVICE
COMMISSION STAFF**

A handwritten signature in black ink, appearing to read "Michael A. Nickerson", is written over a horizontal line.

Michael A. Nickerson (P25138)
Assistant Attorney General
Public Service Division
6545 Mercantile Way, Ste. 15
Lansing, MI 48911
Telephone: (517) 241-6680

Dated: March 9, 2001

2000064580A

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of
MIDWEST ENERGY COOPERATIVE
for approval of its plan to implement
2000 PA 141.

Case No. U-12657

PROOF OF SERVICE

STATE OF MICHIGAN)
)
COUNTY OF INGHAM)

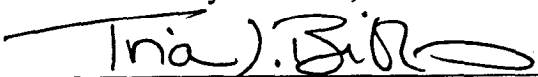
Linda Andreas, being first duly sworn, deposes and says that on **March 9, 2001**, she served a true copy of **Michigan Public Service Commission Staff's Second Discovery Request to Midwest Energy Cooperative** upon the following parties by depositing the same in a United States postal depository enclosed in an envelope bearing postage fully prepaid, plainly addressed as follows:

Albert Ernst
Dykema Gossett PLLC
800 Michigan National Tower
Lansing, MI 48933



Linda Andreas

Subscribed and sworn to before me
this 9th day of March, 2001.



Tina L. Bibbs, Notary Public
Ingham County, Michigan
My Commission Expires: 11/13/2003

ATTACHMENT C

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of
CHERRYLAND ELECTRIC COOPERATIVE
for approval of plans to implement
2000 PA 141.

Case No. U-12658

**STAFF'S SECOND DISCOVERY REQUEST TO
CHERRYLAND ELECTRIC COOPERATIVE**

The Staff of the Michigan Public Service Commission by its attorney and pursuant to Rule 35 of the Commission Rules of Practice and Procedure, 1979 AC, R 460.45 and MCR 2.309 and 2.3 10, submits the following discovery request.

INSTRUCTIONS

- A. Each discovery request must be answered separately and fully in writing under oath, and should identify the person responsible for the answer.
- B. These requests are continuing and require further and supplemental responses if you receive or generate additional information within the scope of these requests between the time of the original responses and the close of the record in this case.
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- D. Please furnish the responses to these requests as soon as possible.

DISCOVERY REQUESTS

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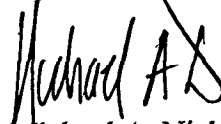
2-ST-3. Please provide a listing of all customers that presently have multiple, separately metered loads that are on adjacent or contiguous parcels, where the Cooperative treats each separately metered load as an individual customer, but the owner of the multiple, separately metered loads is the same person, firm, association, or corporation or any agency of the federal, state, county, or municipal government. Include for each customer: (a) the rate schedule under which each load is being billed and the effective date when the load started to be served under that rate; (b) the previous 12-month load in kW for each meter, and indicate (c) whether the loads are on the same land parcel, adjacent or contiguous parcels.

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Respectfully submitted,

**MICHIGAN PUBLIC SERVICE
COMMISSION STAFF**



Michael A. Nickerson (P25138)
Assistant Attorney General
Public Service Division
6545 Mercantile Way, Ste. 15
Lansing, MI 48911
Telephone: (517) 241-6680

Dated: March 9, 2001

2000064644A

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of
CHERRYLAND ELECTRIC COOPERATIVE
for approval of plans to implement
2000 PA 141.

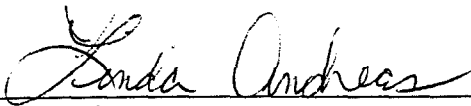
Case No. U-12658

PROOF OF SERVICE

STATE OF MICHIGAN)
)
COUNTY OF INGHAM)

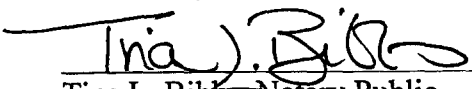
Linda Andreas, being first duly sworn, deposes and says that on **March 9, 2001**, she served a true copy of **Michigan Public Service Commission Staff's Second Discovery Request to Cherryland Electric Cooperative** upon the following parties by depositing the same in a United States postal depository enclosed in an envelope bearing postage fully prepaid, plainly addressed as follows:

Albert Ernst
Dykema Gossett PLLC
800 Michigan National Tower
Lansing, MI 48933



Linda Andreas

Subscribed and sworn to before me
this 9th day of March, 2001.



Tina L. Bibbs, Notary Public
Ingham County, Michigan
My Commission Expires: 11/13/2003

ATTACHMENT D

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of
GREAT LAKES ENERGY COOPERATIVE
for approval of plans to implement
2000 PA 141.

Case No. U-12659

**STAFF'S SECOND DISCOVERY REQUEST TO
GREAT LAKE ENERGY COOPERATIVE**

The Staff of the Michigan Public Service Commission by its attorney and pursuant to Rule 35 of the Commission Rules of Practice and Procedure, 1979 AC, R 460.45 and MCR 2.309 and 2.310, submits the following discovery request.

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DISCOVERY REQUESTS

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Respectfully submitted,

**MICHIGAN PUBLIC SERVICE
COMMISSION STAFF**



Michael A. Nickerson (P25138)
Assistant Attorney General
Public Service Division
6545 Mercantile Way, Ste. 15
Lansing, MI 48911
Telephone: (517) 241-6680

Dated: March 9, 2001

2000064645A

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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Case No. U-12659

PROOF OF SERVICE

STATE OF MICHIGAN)
)
COUNTY OF INGHAM)

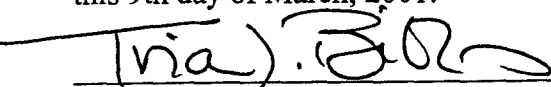
Linda Andreas, being first duly sworn, deposes and says that on **March 9, 2001**, she served a true copy of **Michigan Public Service Commission Staff's Second Discovery Request to Great Lakes Energy Cooperative** upon the following parties by depositing the same in a United States postal depository enclosed in an envelope bearing postage fully prepaid, plainly addressed as follows:

Albert Ernst
Dykema Gossett PLLC
800 Michigan National Tower
Lansing, MI 48933



Linda Andreas

Subscribed and sworn to before me
this 9th day of March, 2001.



Tina L. Bibbs, Notary Public
Ingham County, Michigan
My Commission Expires: 11/13/2003

ATTACHMENT E

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of
**PRESQUE ISLE ELECTRIC
& GAS CO-OP** for approval of plans
to implement 2000 PA 141.

Case No. U-12660

**STAFF'S SECOND DISCOVERY REQUEST TO
PRESQUE ISLE ELECTRIC & GAS CO-OP**

The Staff of the Michigan Public Service Commission by its attorney and pursuant to Rule 35 of the Commission Rules of Practice and Procedure, 1979 AC, R 460.45 and MCR 2.309 and 2.3 10, submits the following discovery request.

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Respectfully submitted,

**MICHIGAN PUBLIC SERVICE
COMMISSION STAFF**

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Michael A. Nickerson (P25138)
Assistant Attorney General
Public Service Division
6545 Mercantile Way, Ste. 15
Lansing, MI 48911
Telephone: (517) 241-6680

Dated: March 9, 2001

2000064646A

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of
**PRESQUE ISLE ELECTRIC
& GAS CO-OP** for approval of plans
to implement 2000 PA 141.

Case No. U-12660

PROOF OF SERVICE

STATE OF MICHIGAN)
)
COUNTY OF INGHAM)

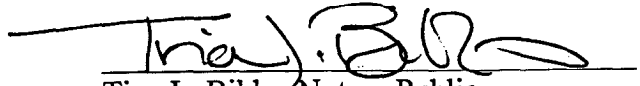
Linda Andreas, being first duly sworn, deposes and says that on **March 9, 2001**, she served a true copy of **Michigan Public Service Commission Staff's Second Discovery Request to Presque Isle Electric Gas & Co-Op** upon the following parties by depositing the same in a United States postal depository enclosed in an envelope bearing postage fully prepaid, plainly addressed as follows:

Albert Ernst
Dykema Gossett PLLC
800 Michigan National Tower
Lansing, MI 48933



Linda Andreas

Subscribed and sworn to before me
this 9th day of March, 2001.



Tina L. Bibbe, Notary Public
Ingham County, Michigan
My Commission Expires: 11/13/2003

ATTACHMENT F

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of
**HOMEWORKS TRI-COUNTY ELECTRIC
COOPERATIVE** for approval of plans
to implement 2000 PA 141.

Case No. U-12661

**STAFF'S SECOND DISCOVERY REQUEST TO
HOMEWORKS TRI-COUNTY ELECTRIC COOPERATIVE**

The Staff of the Michigan Public Service Commission by its attorney and pursuant to Rule 35 of the Commission Rules of Practice and Procedure, 1979 AC, R 460.45 and MCR 2.309 and 2.310, submits the following discovery request.

INSTRUCTIONS

- A. Each discovery request must be answered separately and fully in writing under oath, and should identify the person responsible for the answer.
- B. These requests are continuing and require further and supplemental responses if you receive or generate additional information within the scope of these requests between the time of the original responses and the close of the record in this case.
- C. With respect to any document or communication for which you claim a privilege, identify the document or communication, including the general subject matter, but not the substance, state the privilege involved and also state the factual and legal basis for the privilege.
- D. Please furnish the responses to these requests as soon as possible.

DISCOVERY REQUESTS

2-ST-1. Please provide a listing of all customers that presently have multiple, separately metered loads. Include for each customer: (a) the rate schedule under which each load is being billed and the effective date when the load started to be served under that rate; (b) the previous 12-month load in kW for each meter, and indicate (c) whether the loads are on the same land parcel, adjacent or contiguous parcels.

2-ST-2. Please provide a listing of all customers that presently have a single metered load, but some or all of that load was previously served via multiple, separate meters. Include for each customer: (a) the rate schedule under which the load is presently being billed, and the effective date when the load started to be served under that rate; (b) the rate schedules that the separate loads were previously billed under, and the beginning and ending dates when the loads were served under those rates; (c) the previous 12-month load in kW, and indicate (d) if the load is presently all on a single land parcel, or if the load is on more than one adjacent or contiguous parcels.

2-ST-3. Please provide a listing of all customers that presently have multiple, separately metered loads that are on adjacent or contiguous parcels, where the Cooperative treats each separately metered load as an individual customer, but the owner of the multiple, separately metered loads is the same person, firm, association, or corporation or any agency of the federal, state, county, or municipal government. Include for each customer: (a) the rate schedule under which each load is being billed and the effective date when the load started to be served under that rate; (b) the previous 12-month load in kW for each meter, and indicate (c) whether the loads are on the same land parcel, adjacent or contiguous parcels.

2-ST-4. Please provide a listing of all customers that presently have multiple, separately metered loads that are not on adjacent or contiguous parcels, where the Cooperative treats each separately metered load as an individual customer, but the owner of the multiple,

separately metered loads is the same person, firm, association, or corporation or any agency of the federal, state, county, or municipal government. Include for each customer: (a) the rate schedule under which each load is being billed and the effective date when the load started to be served under that rate; (b) the previous 12-month load in kW for each meter, and indicate (c) whether the loads are on the same land parcel, adjacent or contiguous parcels.

Respectfully submitted,

**MICHIGAN PUBLIC SERVICE
COMMISSION STAFF**

A handwritten signature in black ink, appearing to read "Michael A. Nickerson", is written over a horizontal line.

Michael A. Nickerson (P25138)
Assistant Attorney General
Public Service Division
6545 Mercantile Way, Ste. 15
Lansing, MI 48911
Telephone: (517) 241-6680

Dated: March 9, 2001

2000064649A

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of
**HOMEWORKS TRI-COUNTY ELECTRIC
COOPERATIVE** for approval of plans
to implement 2000 PA 141.

Case No. U-12661

PROOF OF SERVICE

STATE OF MICHIGAN)
)
COUNTY OF INGHAM)

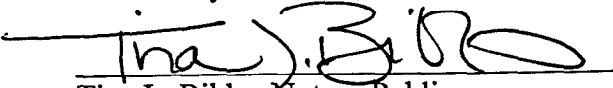
Linda Andreas, being first duly sworn, deposes and says that on **March 9, 2001**, she served a true copy of **Michigan Public Service Commission Staff's Second Discovery Request to Homeworks Tri-County Electric Cooperative** upon the following parties by depositing the same in a United States postal depository enclosed in an envelope bearing postage fully prepaid, plainly addressed as follows:

Albert Ernst
Dykema Gossett PLLC
800 Michigan National Tower
Lansing, MI 48933



Linda Andreas

Subscribed and sworn to before me
this 9th day of March, 2001.



Tina L. Bibbs, Notary Public
Ingham County, Michigan
My Commission Expires: 11/13/2003

ATTACHMENT G

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of Cloverland Electric Cooperative's compliance filing relative to the restructuring plan required by 2000 PA 141 and the Commission's June 19, 2000 opinion and order in Case No. U-12464.	))))))	Case No. U-12656
In the matter of Midwest Energy Cooperative's compliance filing relative to the restructuring plan required by 2000 PA 141 and the Commission's June 19, 2000 opinion and order in Case No. U-12464.	))))))	Case No. U-12657
In the matter of Cherryland Electric Cooperative's compliance filing relative to the restructuring plan required by 2000 PA 141 and the Commission's June 19, 2000 opinion and order in Case No. U-12464.	))))))	Case No. U-12658
In the matter of Great Lakes Energy Cooperative's compliance filing relative to the restructuring plan required by 2000 PA 141 and the Commission's June 19, 2000 opinion and order in Case No. U-12464.	))))))	Case No. U-12659
In the matter of Presque Isle Electric & Gas Co-op's compliance filing relative to the restructuring plan required by 2000 PA 141 and the Commission's June 19, 2000 opinion and order in Case No. U-12464.	))))))	Case No. U-12660
In the matter of HomeWorks Tri-County Electric Cooperative's compliance filing relative to the restructuring plan required by 2000 PA 141 and the Commission's June 19, 2000 opinion and order in Case No. U-12464.	)))))))	Case No. U-12661

COOPERATIVES' RESPONSES TO STAFF'S
SECOND SET OF DISCOVERY REQUESTS

Cloverland Electric Cooperative in Case No. U-12656, Midwest Energy Cooperative in Case No. U-12657, Cherryland Electric Cooperative in Case No. U-12658, Great Lakes Energy Cooperative in Case No. U-12659, Presque Isle Electric & Gas Co-op in Case No. U-12660, and HomeWorks Tri-County Electric Cooperative in Case No. U-12661, (*collectively "the Cooperatives"*), by their attorneys, DYKEMA GOSSETT PLLC, in answer to Michigan Public Service Commission Staff's ("*Staff*") Second Set of Discovery Requests state as follows:

2-ST-1. Please provide a listing of all customers that presently have multiple, separately metered loads. Include for each customer: (a) the rate schedule under which each load is being billed and the effective date when the load started to be served under that rate; (b) the previous 12-month load in kW for each meter, and indicate (c) whether the loads are on the same land parcel, adjacent or contiguous parcels.

RESPONSE: The Cooperatives object to this request as not relevant, not likely to lead to the discovery of relevant information, overly broad, and unduly burdensome. The information sought is related to the issue of aggregation and, under § 10x(1) of 2000 PA 141, the Cooperatives cannot be required to permit customer aggregation prior to January 1, 2005. Moreover, the information sought is overly broad and unduly burdensome. The Cooperatives estimate that it would take weeks (or months in some cases) for them to compile the information necessary to respond to this request.

Respondent: Counsel to the Cooperatives.

2-ST-2 Please provide a listing of all customers that presently have a single metered load, but some or all of that load was previously served via multiple, separate meters. Include for each customer: (a) the rate schedule under which the load is presently being billed, and the effective date when the load started to be served under that rate; (b) the rate schedules that the separate loads were previously billed under, and the beginning and ending dates when the loads were served under those rates; (c) the previous 12-month load in Kw, and indicate (d) if the load is presently all on a single land parcel, or if the load is on more than one adjacent or contiguous parcels.

RESPONSE: The Cooperatives object to this request as not relevant, not likely to lead to the discovery of relevant information, overly broad, and unduly burdensome. The information sought is related to the issue of aggregation and, under § 10x(1) of 2000 PA 141, Cooperatives cannot be required to permit customer aggregation prior to January 1, 2005. Moreover, the information sought is overly broad and unduly burdensome. The Cooperatives estimate that it would take weeks (or months in some cases) for them to compile the information necessary to provide a response.

Respondent: Counsel to the Cooperatives.

2-ST-3. Please provide a listing of all customers that presently have multiple, separately metered loads that are on adjacent or contiguous parcels, where the Cooperative treats each separately metered load as an individual customer, but the owner of the multiple, separately metered loads is the same person, firm, association, or corporation or any agency of the federal, state, county, or municipal government. Include for each customer: (a) the rate schedule under which each load is being billed and the effective date when the load started to be served under that rate; (b) the previous 12-month load in kW for each meter, and indicate (c) whether the loads are on the same land parcel, adjacent or contiguous parcels.

RESPONSE: The Cooperatives object to this request as not relevant, not likely to lead to the discovery of relevant information, overly broad, and unduly burdensome. The information sought is related to the issue of aggregation and, under § 10x(1) of 2000 PA 141, Cooperatives cannot be required to permit customer aggregation prior to January 1, 2005. Moreover, the information sought is overly broad and unduly burdensome. The Cooperatives estimate that it would take weeks (or months in some cases) for them to compile the information necessary to provide a response.

Respondent: Counsel to the Cooperatives.

2-ST-4. Please provide a listing of all customers that presently have multiple, separately metered loads that are not on adjacent or contiguous parcels, where the Cooperative treats each separately metered load as an individual customer, but the owner of the multiple, separately metered loads is the same person, firm, association, or corporation or any agency of the federal, state, county, or municipal government. Include for each customer: (a) the rate schedule under which each load is being billed and the effective date when the load started to be served under that rate; (b) the previous 12-month load in kW for each meter, and indicate (c) whether the loads are on the same land parcel, adjacent or contiguous parcels.

RESPONSE: The Cooperatives object to this request as not relevant, not likely to lead to the discovery of relevant information, overly broad, and unduly burdensome. The information sought is related to the issue of aggregation and, under § 10x(1) of 2000 PA 141, Cooperatives cannot be required to permit customer aggregation prior to January 1, 2005. Moreover, the information sought is overly broad and unduly burdensome. The Cooperatives estimate that it would take weeks, if not months, for them to compile the information necessary to provide a response.

Respondent: Counsel to the Cooperatives.

Objections Prepared On Behalf Of:

CLOVERLAND ELECTRIC COOPERATIVE,
MIDWEST ENERGY COOPERATIVE
CHERRYLAND ELECTRIC COOPERATIVE,
GREAT LAKES ENERGY COOPERATIVE,
PRESQUE ISLE ELECTRIC & GAS CO-OP, and
HOMEWORKS TRI-COUNTY ELECTRIC
COOPERATIVE,

By: *Christine Mason Soneral*

Albert Ernst (P24059)

Christine Mason Soneral (P58820)

DYKEMA GOSSETT PLLC

800 Michigan National Tower

Lansing, Michigan 48933

(517) 374-9155/(517) 374-9184

Dated: March 16, 2001

* * * * *

Case No. U-12656

Case No. U-12657

Case No. U-12658

Case No. U-12659

Case No. U-12660

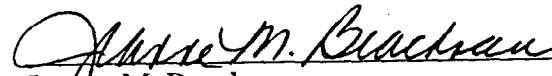
Case No. U-12661

PROOF OF SERVICE

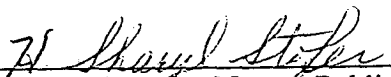
PROOF OF SERVICE

STATE OF MICHIGAN)
) ss.
COUNTY OF INGHAM)

Jeanne M. Beachnau, being first duly sworn, deposes and says that on March 16, 2001, she caused to be served upon Mr. Michael Nickerson, Assistant Attorney General, 6545 Mercantile Way, Suite 15, Lansing, MI 48911, a copy of Cooperatives' Responses To Staff's Second Set of Discovery Issues by United States First Class Mail and electronic mail.


Jeanne M. Beachnau

Subscribed and sworn to before me
on March 16, 2001


H. Sharyl Stofer, Notary Public
Ingham County, Michigan
My commission expires: 12/17/03

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ID\CMMA

In the matter of the application of
CLOVERLAND ELECTRIC COOPERATIVE
for approval of its plan to implement
2000 PA 141.

In the matter of the application of
MIDWEST ENERGY COOPERATIVE
for approval of its plan to implement
2000 PA 141.

In the matter of the application of
CHERRYLAND ELECTRIC COOPERATIVE
for approval of plans to implement
2000 PA 141.

In the matter of the application of
GREAT LAKES ENERGY COOPERATIVE
for approval of plans to implement
2000 PA 141.

In the matter of the application of
PRESQUE ISLE ELECTRIC
& GAS CO-OP for approval of plans
to implement 2000 PA 141.

In the matter of the application of
HOMEWORKS TRI-COUNTY ELECTRIC
COOPERATIVE for approval of plans
to implement 2000 PA 141.

STATE OF MICHIGAN)
)
COUNTY OF INGHAM)

Linda Andreas, being first duly sworn, deposes and says that on **April 9, 2001**, she served a true copy of **Michigan Public Service Commission Staff's Motion to Compel Answers to Staff's Second Discovery Request** upon the following parties via electronic mail and by depositing the same in a United States postal depository enclosed in an envelope bearing postage fully prepaid, plainly addressed as follows:

Albert Ernst
Christine Mason Soneral
Dykema Gossett PLLC
800 Michigan National Tower
Lansing, MI 48933



Linda Andreas

Subscribed and sworn to before me
this 9th day of April, 2001.



Tina L. Bibbs, Notary Public
Ingham County, Michigan
My Commission Expires: 11/13/2003