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July 13, 2001

Ms. Dorothy Wideman
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way, Ste. 7
Lansing, MI 48911

Re: Case Nos. U-12780/U-12781
Great Lakes' Reply Brief

Dear Ms. Wideman:

Enclosed please find original and four copies of Great Lakes Energy Cooperative's Reply Brief in the above-referenced matter. Also enclosed is Proof of Service upon the Parties of Record.

If there are any questions or comments, do not hesitate to contact me.

Sincerely,

DYKEMA GOSSETT PLLC



Christine Mason Soneral

CMS/jmb

Enclosures

cc: Parties of Record
Albert Ernst
Steve Boeckman
Pat Anzel
Eric Baker
Mike Roberge
Carl Milliron
Steve Videto

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STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of)
INDIANA MICHIGAN POWER COMPANY,)
d/b/a American Electric Power,) Case No. U-12780
for certain approvals in connection with)
2000 PA 141 Section 10v.)
_____)

In the matter of the application of)
INTERNATIONAL TRANSMISSION COMPANY,)
CONSUMERS ENERGY COMPANY, and) Case No. U-12781
GREAT LAKES ENERGY COOPERATIVE.)
_____)

GREAT LAKES ENERGY COOPERATIVE'S REPLY BRIEF

Section 10v of 2000 PA 141 provides that electric utilities serving more than 100,000 customers in Michigan shall file by January 1,2001, a joint plan to permanently expand, by June 5,2002, the available transmission capability by at least 2,000 megawatts over the amount in place as of January 1,2000. If the utilities are unable to agree on a joint plan, the Michigan Public Service Commission ("MPSC" or "Commission") is required to conduct a hearing to establish a plan. *See* MCL 460.10v; MSA 22.13(10v).

In order to conform with the requirements of section 10v, several utilities, including International Transmission Company ("ITC") on behalf of Detroit Edison Company ("Detroit Edison"), Consumers Energy Company ("Consumers Energy"), Great Lakes Energy Cooperative ("Great Lakes"), and American Electric Power ("AEP") participated in a study to determine the

transmission facilities that limit power imports into the Lower Peninsula of Michigan to less than 6,000 MW and to develop mitigation plans to upgrade existing facilities and install new facilities (3 Tr 135). The study, referred to as the Michigan Import System Study Group or “MISS G” study, formed the basis for the plans submitted in this case.

On December 28, 2000, ITC, Consumers Energy, and Great Lakes submitted an application requesting approval for their proposed plan. On December 28, 2000, AEP also submitted a separate application requesting approval for its own proposed plan. The only significant difference between the two plans was that AEP’s plan did not include a project on the AEP transmission system identified as a second transformer at the Dumont substation located in northern Indiana.

Since the parties were unable to agree on a joint plan, the Commission was required to conduct a hearing to establish a joint plan. Accordingly, on January 4, 2001, the Commission issued its Notice of Hearing and a prehearing conference was set for February 7, 2001.

At the February 7, 2001 prehearing conference, Administrative Law Judge James R. Rigas (“ALJ”) presiding, a procedural schedule was established.¹ At the cross-examination hearing held on June 6, 2001, counsel for AEP adopted the plan filed by ITC, Consumers Energy, and Great Lakes:

“AEP will at this time unilaterally stipulate to the joint report filed by the other utilities. And thus, we will not offer into the record in this proceeding either the

¹Applicants were directed to file testimony by March 16, 2001; Staff and Intervenor’s testimony was due April 25, 2001; rebuttal testimony for all parties was due by May 18, 2001; and cross-examination of all parties scheduled for May 30, 2001 and May 31, 2001. Cross-examination was then adjourned until June 6, 2001 so that the parties could continue settlement discussions.

plan filed by AEP or the testimony of Mr. Pasternack in support of that plan.” 3
Tr 39.

Thus, with AEP’s stipulation, the parties now had a single Joint Plan. In addition, Consumers Energy (3 Tr 131-140), ITC (3 Tr 105-128), and Commission Staff (3 TR 178-195) at the June 6, 2001 cross-examination hearing, supported the conclusion that the Joint Plan complies with the requirements of section 10v of 2001 PA 141.

Several parties filed initial briefs on June 29, 2001 indicating that, in light of AEP’s stipulation, the parties now have one Joint Plan for permanently expanding the available transmission capability by at least 2,000 megawatts over the amount in place as of January 1, 2000 and that the Joint Plan fulfills the requirements of Section 10v of 2000 PA 141.² Great Lakes agrees with this position and recommends that the Commission conclude this case with an order authorizing the plan by confirming its compliance with the requirements of Section 10v of 2000 PA 141. Great Lakes does not believe that there remains any issue to be addressed by the Commission other than to approve the Joint Plan filed.

CONCLUSION

For the reasons set forth above, Great Lakes respectfully requests that the Commission issue an order confirming the Joint Plan’s compliance with the requirements set forth in Section 10v of 2000 PA 141 and closing this case.

² See AEP Initial Brief, pp 3-4; Consumers Energy Initial Brief, pp 3-4; Commission Staff’s Initial Brief, pp 3; Energy Michigan’s Initial Brief, p 2; ABATE’s Initial Brief, p 1; ITC Initial Brief, p 5; PG&E National Energy Group Initial Brief, p 3.

Respectfully submitted,

GREAT LAKES ENERGY COOPERATIVE

By: Christine Mason Soneral

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Date: July 13, 2001

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STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of
INDIANA MICHIGAN POWER COMPANY,
d/b/a American Electric Power,
for certain approvals in connection with
2000 PA 141 Section 10v.

Case No. U-12780

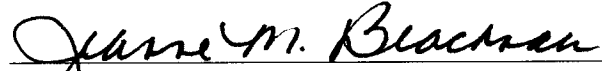
In the matter of the application of
INTERNATIONAL TRANSMISSION COMPANY,
CONSUMERS ENERGY COMPANY, and
GREAT LAKES ENERGY COOPERATIVE.

Case No. U-12781

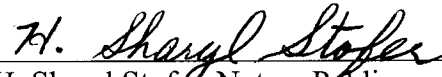
PROOF OF SERVICE

STATE OF MICHIGAN)
) ss.
COUNTY OF INGHAM)

Jeanne M. Beachnau, being first duly sworn, deposes and says that on July 13, 2001, she caused to be served upon the persons listed in the attached Service List, copies of Great Lakes Energy Cooperative's Reply Brief in the above-captioned matter by United States first class and electronic mail.


Jeanne M. Beachnau

Subscribed and sworn to before me
on July 13, 2001.


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

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