

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the request of THE DETROIT)
EDISON COMPANY for a Declaratory Order)
regarding MPSC jurisdiction associated with the)
“Rouge Complex” and Dearborn Industrial)
Generation, L.L.C.)
_____)

Case No. U-12979

BOH No. _____

PETITION TO INTERVENE

Ford Motor Company, a Delaware Corporation (“Ford”) and Rouge Steel Company, a Delaware Corporation (“Rouge”), by their attorneys, Clark Hill P.L.C., petition to intervene in this proceeding in opposition to any final determination that Ford and Rouge may only take retail service from The Detroit Edison Company (“Edison”) and in support thereof state as follows:

1. Ford is a worldwide manufacturer of automobiles and owns substantial financial services operations. Ford was incorporated in 1919 and has its world headquarters in Dearborn, Michigan. Within the Rouge Industrial Complex in Dearborn, Michigan (“Rouge Complex”), Ford currently operates an automobile assembly plant, miscellaneous manufacturing facilities, an engine plant and a frame plant. The Rouge Complex is among the world’s largest integrated manufacturing facilities, with over 10,000 direct employees.

2. Rouge has operated an integrated steel manufacturing facility within the Rouge Complex since 1926. It was originally a division of Ford and then a wholly owned subsidiary of Ford but in 1989 became an independent company. Subsequently in 1994, Rouge became a publicly traded company. Ford does not now have any ownership interest in Rouge. Rouge is a fully integrated producer of flat rolled carbon steel products, supplying much of Ford’s steel requirements for use at the Rouge Complex and Ford’s other automotive manufacturing

operations. In addition, Rouge produces steel products for other automotive producers and suppliers as well as a variety of non-automotive customers.

3. Ford and Rouge historically have obtained their electrical requirements from a jointly owned powerhouse located in the Rouge Complex. They have been held to be public utilities by the Federal Energy Regulatory Commission (“FERC”) in Docket No. ER90-184-000. In the same docket, FERC approved an interconnection agreement between Ford and Rouge and Edison, which included both the rates for sales and the rates for purchases applicable to all parties.

4. Due to the aging boilers at the powerhouse, Ford and Rouge made a decision to replace the powerhouse with a state of the art cogeneration facility which would use blast furnace gas as its base fuel.

5. Dearborn Industrial Generation, L.L.C. (“DIG”) was ultimately chosen as the designer, owner and operator of the new cogeneration facility that is currently under construction and under going testing.

6. Ford and Rouge do not contest that the Commission has jurisdiction over the matters alleged by Edison but Ford and Rouge do oppose the meeting scheme outlined in Edison’s Application. Ford and Rouge would also note that FERC has claimed jurisdiction over metering in a FERC proceeding to which the Commission is a party.

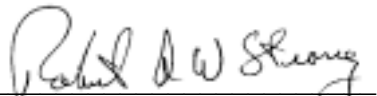
7. This matter could fundamentally affect the rights of Ford and Rouge and therefore, they have a right to intervene in this case and be treated as full parties.

8. Ford and Rouge request this matter be conducted as a contested case proceeding.

WHEREFORE, Ford and Rouge respectfully request that the Commission grant this Petition to Intervene and, make them full parties to this proceeding.

Respectfully submitted,

CLARK HILL P.L.C.

By: 
Robert A.W. Strong (P27724)
Attorneys for Ford Motor Company and
Rouge Steel Company
255 S. Old Woodward Avenue, Third Floor
Birmingham, Michigan 48009
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Dated: June 29, 2001

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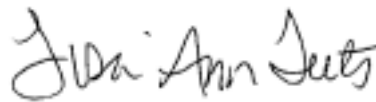
PROOF OF SERVICE

STATE OF MICHIGAN)
)
COUNTY OF OAKLAND)

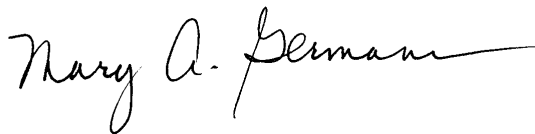
Lisa Ann Teets, being first duly sworn, deposes and says that she filed electronically Petition to Intervene of Ford Motor Company and Rouge Steel Company in the above docket on the person identified below by depositing the same on June 29, 2001, in the United States mail in the City of Birmingham, Michigan with first-class postage thereon fully paid.

Jon P. Christinidis, Esq.
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Lisa Ann Teets



My Commission Expires October 21, 2002