

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter of the application of DTE  
ELECTRIC COMPANY for authority to increase  
its rates, amend its rate schedules and rules  
governing the distribution and supply of electric  
energy, and for miscellaneous accounting  
authority.

MPSC No. U-21860

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**Attorney General's Concurrence with  
Michigan Environmental Council's Petition for Rehearing  
and to Alter, Amend, or Modify Order**

Michigan Attorney General Dana Nessel (the "Attorney General") hereby provides her concurrence with Michigan Environmental Council's (MEC) Petition for Rehearing and to Alter, Amend, or Modify Order, filed on March 23, 2026. The Attorney General, based on her participation in both this case and in U-21845, concurs with and supports MEC's requests that the Commission:

- A. Clarify the standards applicable to IRM reconciliation and order DTE Electric to update the 2026 IRM Investment Plan if an accurate plan is necessary for reconciliation;
- B. Clarify the scope of IRM reconciliation and, if reconciliation is not a robust proceeding to evaluate the reasonableness and prudence of project-level IRM decision-making, then reject the extension of the IRM to 2027;
- C. Reject the 2027 IRM extension because it is premature ahead of the June 2026 DSP, which is intended to assess IRM program effectiveness and develop integrated distribution program strategies that will help define effective and appropriate reliability spending; and

D. Clarify the intended IRM regulatory process in light of the February Order, recent orders in U-21305 and U-20147, and the ongoing U-21845 reconciliation proceeding.

Respectfully submitted,

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