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July 1, 2026

Ms. Lisa Felice
Michigan Public Service Commission
7109 W. Saginaw Hwy.
Lansing, MI 48909

Via E-File

RE: MPSC Case No. U-22058

Dear Ms. Felice:

Attached please find the enclosed documents for filing:

- Official Exhibit List and Exhibits of Michigan Environmental Council, Natural Resources Defense Council, and Sierra Club; and
- Proof of Service.

Thank you for your assistance in this matter. If you have any questions, please feel free to contact me.

Sincerely,

Digitally signed by Holly Hillyer
Date: 2026.07.01 14:23:41 -04'00'

Holly L. Hillyer
holly@tropospherelegal.com

CC: Parties to Case No. U-22058

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of **DTE ELECTRIC COMPANY** for approval of special contracts and for other relief.	Case No. U-22058

OFFICIAL EXHIBIT LIST AND EXHIBITS OF
MICHIGAN ENVIRONMENTAL COUNCIL,
NATURAL RESOURCES DEFENSE COUNCIL, AND SIERRA CLUB

MEC-1	CV of Bryndis Woods
MEC-2	Company Response to U-22058-MNS 1.2b & d
MEC-3	Company Response to U-22058-CEOMEIBCIEIDE 1.20b & 1.21b
MEC-4	Company Response to U-22058-MNS 1.11
MEC-5	Company Response to U-22058-MNS 2.5c
MEC-6	Company Response to U-22058-MNS 2.15a
MEC-7	Company Response to U-22058-MNS 1.4a
MEC-8	Company Response to U-22058-MNS 2.10a
MEC-9	Company Response to U-22058-MNS 2.12b
MEC-10	Company Response to U-22058-MNS-1.13a
MEC-11	Company Response to U-22058-MNS 3.14
MEC-12	Company Response to U-22058-CEOMEIBCIEIDE 1.41a
MEC-13	Company Response to U-22058-MNS 2.14a
MEC-14	Company Response to U-22058-MNS 1.12a
MEC-15	Company Response to U-22058-MNS 3.13
MEC-16	*Reserved*
MEC-17	Company Response to U-22058-MNSDE-2.21ai & aiv
MEC-18	Company Response to U-22058-MNSDE-1.7c
MEC-19	Company Response to U-22058-MNSDE-4.1a
MEC-20	Company Response to U-22058-MNSDE-4.2a & b
MEC-21	*Reserved*
MEC-22	*Reserved*
MEC-23	*Reserved*
MEC-24	*Reserved*
MEC-25	*Reserved*
MEC-26	Company Response to U-22058-MNSDE-2.12a-c
MEC-27	*Reserved*
MEC-28	Company Response to U-22058-CEOMEIBCIEIDE-3.2 + Att.
MEC-29	U-21662 Exhibit A-2 REP Summary

MEC-30	U-21990 Ex. A-3 Renewable Portfolio Compliance Summary
MEC-31	*Reserved*
MEC-32	*Reserved*
MEC-33	*Reserved*
MEC-34	*Reserved*
MEC-35	Company Response to U-22058-MNSDE 1.5b
MEC-36	Company Response to U-22058-MNSDE-1.19
MEC-37	Company Response to U-22058-CEOMEIBCIEIDE-1.8a
MEC-38	Company Response to U-22058-MNSDE-2.7a, b, c
MEC-39	Company Response to U-22058-CEOMEIBCIEIDE-1.22
MEC-40	Company Response to U-22058-MNSDE-2.5b
MEC-41	Company Response to U-22058-MNSDE-2.6a-b
MEC-42	Company Response to U-22058-MNSDE-2.15c
MEC-43	Company Response to U-22058-MNSDE-3.7
MEC-44	Company Response to U-22058-AGDE-2.52b-c
MEC-45	Company Response to U-22058-AGDE-2.55a
MEC-46	Company Response to U-22058-AGDE-2.60b+d
MEC-47	Company Response to U-22058-AGDE-2.61
MEC-48	Company Response to U-22058-CEOMEIBCIEIDE-1.21b+bi
MEC-49	Company Response to U-22058-MNSDE-2.19

Troposphere Legal
Counsel for MNS

Date: July 1, 2026

By: Digitally signed by Holly Hillyer Date: 2026.07.01 14:24:04 -04'00'

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Christopher M. Bzdok (P53094)
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Shannon Fisk (pro hac vice)
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Bryndis Woods, Ph.D., Principal Analyst

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PROFESSIONAL EXPERIENCE

Applied Economics Clinic, Boston, MA. Principal Analyst, 2017 – Present

Assistant Director, Oct. 2022 – Jan. 2023

Board Member—Staff Representative, April 2019 – Jan. 2020

Conducts research and analysis on electric utility regulation, energy markets, and energy policy. Clients are primarily public service organizations working on topics related to the environment, consumer rights, the energy sector, and community equity.

International Institute for Sustainable Development's Earth Negotiations Bulletin (IISD-ENB), Boston, MA. *Staff Writer*, 2017 – 2020.

Responsible for writing and editing the Earth Negotiations Bulletin and IISD's other conference reporting services. Develop clear and succinct summaries of international processes, including the Intergovernmental Panel on Climate Change and the United Nations Framework Convention on Climate Change.

Nordic Centre of Excellence for Strategic Adaptation Research (NORD-STAR), Reykjavik, Iceland. *Doctoral Researcher*, 2012 – 2020.

Responsible for leading research on agricultural adaptation in Denmark. Performed survey design, distribution and analysis, principal component analysis, cluster analysis, and content analysis.

Business for Social Responsibility (BSR), Copenhagen, Denmark. *Analyst*, 2015 – 2016.

Responsible for detailed research and analysis, outreach, communications, writing, technical assistance, strategy and partnership development, and direct client work on sustainable development issues including adaptation and resilience, climate adaptation governance, supply chain sustainability and climate risk management. Split time between partnership development team – that works with bi- and multilateral development institutions – and consulting services – that works with member companies.

University of Iceland, Reykjavik, Iceland. *Researcher/Lecturer*, 2012 – 2013.

Led research on international climate negotiations and policy using economic game theory and discourse analysis. Lectured on the economics of climate change for a Master's level course "Global Climate Change: Past, Present and Future" in the Department of Environment and Natural Resources.

EDUCATION

University of Iceland, Reykjavik, Iceland

Doctor of Philosophy, Environment and Natural Resources, 2020

University of Iceland, Reykjavik, Iceland

Master of Science, Environment and Natural Resources, 2012

University of Michigan, Ann Arbor, MI

Bachelor of Arts, Sociology, High Distinction, 2009

AFFILIATIONS

Global Development and Environment Institute, Tufts University, Medford, MA.

Visiting Scholar, 2017 – 2020

PUBLICATIONS

Stanton, E.A., J.R. Castigliego, J. Burt, and B. Woods. 2026. *Savings from Coal to Gas Conversion: Florida's Northside 1 and 2*. Applied Economics Clinic White Paper, AEC-2026-04-WP-01. Prepared on behalf of Sierra Club. [Online]

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Alisalad, S. and B. Woods. 2025. *GreenRoots' Pathway to Interconnection.* Applied Economics Clinic. Prepared on behalf of GreenRoots. [Online]

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Stanton, E.A., A. Zhang, S. Alisalad, and B. Woods. 2024. *Best Practices in Electric Sector Load Forecasting.* Applied Economics Clinic. [Online]

Stasio, T., E. Seliga, B. Woods, and E.A. Stanton. 2024. *Energy Storage Equity: An Assessment of Three Massachusetts Programs.* Applied Economics Clinic. Prepared on behalf of Clean Energy Group. [Online]

Stanton, E.A., B. Woods, T. Stasio, J. Burt, D. Garraway, N. Biswas, and A. Shute. 2024. *Illinois Adult Use Cannabis Industry Disparity Study*. Prepared on behalf of the Illinois Cannabis Regulation Oversight Office. [Online]

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Woods, B., E.A. Stanton, and D. Wamsted. 2020. *Risks Outweigh Rewards for Investors Considering PJM Natural Gas Projects.* Prepared for the Energy Foundation. [Online]

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Woods, B., E.A. Stanton, and Applied Economics Clinic. 2019. *Social Equity Analysis of Carbon Free Boston.* Applied Economics Clinic. Prepared for Green Ribbon Commission. [Online]

Sierra Club, assisted by Comings, T., B. Woods, R. Lopez, and E. Tavares. 2019. *Comments on Southwestern Electric Power Company's Draft 2019 Integrated Resource Plan*. [Online]

Woods, B., E.A. Stanton, and R. Lopez. 2019. *Performance-Based Incentives for Gas Utilities.* Applied Economics Clinic. Prepared for Gas Leak Allies. [Online]

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Stanton, E.A., T. Comings, R. Wilson, S. Alisalad, E.N Marzan, C. Schlegel, B. Woods, J. Gifford, E. Snook, and P. Yuen. 2018. *An Analysis of the Massachusetts 2018 'Act to Promote a Clean Energy Future' Report.* Applied Economics Clinic. Prepared for Barr Foundation. [Online]

Woods, B., C. Schlegel, and E.A. Stanton. 2018. *Massachusetts' Clean Energy Policy Overview.* Applied Economics Clinic. Prepared for Barr Foundation. [Online]

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Stanton, E.A., R. Wilson, and B. Woods. 2018. *Missed Opportunities for Energy Efficiency in Virginia*. Applied Economics Clinic. Prepared for Consumers Union. [Online]

Wilson, R., S. Alisalad, E.N. Marzan, and B. Woods. 2017. *Atlantic Coast Pipeline: Economics and Manufacturing Jobs*. Applied Economics Clinic. Prepared for Natural Resources Defense

Council. [Online]

Comings, T. and B. Woods. 2017. *The Future of the Martin Drake Power Plant.* Applied Economics Clinic. Prepared for Green Cities Coalition and Southeastern Colorado Renewable Energy Society. [Online]

Allan, J., R.R. Bhandary, A. Bisiaux, P. Chasek, N. Jones, M. Luomi, A. Schulz, C. Verkuijl, and B. Woods. (Eds.). 2017. *From Bali to Marrakech: A Decade of International Climate Negotiations*. International Institute for Sustainable Development Reporting Services. [Online]

Comings, T., E.A. Stanton, and B. Woods. 2017. *An Analysis of Community Choice Energy for Boston.* Applied Economics Clinic. Prepared for Barr Foundation. [Online]

Woods, B., H.Ø. Nielsen, A.B. Pedersen, and D. Kristofersson. 2017. *Farmers' perceptions of climate change and their likely responses in Danish agriculture.* Land Use Policy, 65, 109-120. [Online]

Woods, B. and D. Kristofersson. 2016. *The state of coalitions in international climate change negotiations and implications for global climate policy.* International Journal of Environmental Policy and Decision Making, 2(1), 41-68. [Online]

Woods, B. 2016. *Food, Fuel, and Finance: A Call for Corporate Climate Action in 2016.* BSR: San Francisco. [Online]

Crowley, H., C. Driscoll Goulay, E. Niemtzow, T. Norton, E. Prattico, and B. Woods. 2015. *Climate Change: Implications and Strategies for the Luxury Fashion Sector.* BSR Working Paper in collaboration with Kering. BSR: San Francisco. [Online]

Woods, B. 2015. *Walking the Walk: How Food and Agriculture Businesses Take Action on Climate*. BSR: San Francisco. [Online]

Woods, B. and E. Prattico. 2015. *Two Recent Events Signal Government and Business Willing to Collaborate on Climate*. BSR: San Francisco. [Online]

Woods, B. and D. Kristofersson. 2015. *Strange Bedfellows: What Really Defines Coalitions in International Climate Change Negotiations?* Athens Journal of Social Sciences. [Online]

Woods, B. 2015. *Progress in Peru, Tall Tasks Ahead in 2015.* Worldwatch Institute Europe. [Online]

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Woods, B. 2014. *Why Denmark? I wouldn't want to be a PhD student anywhere else.* The Guardian. [Online]

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TESTIMONY AND EXPERT COMMENTS

Woods, B. 2026. *Comments Regarding STREAM's Proposed Data Center.* Applied Economics Clinic. Prepared on behalf of Tonawanda Seneca Nation and Sierra Club Niagara

Group. [Online]

Woods, B. 2026. *Testimony on Southwestern Public Service Company's (SPS) Application to Construct New Generation Facilities*. Prepared on behalf of Sierra Club. [Online]

Woods, B. 2023. *Testimony on Dominion's 2023 Integrated Resource Plan*. Prepared on behalf of Clean Virginia. [Online]

Woods, B. and Stanton, E.A. 2021. *Comments on Astoria Gas Turbine Power LLC's Proposed Gas-Fired Combustion Turbine*. Prepared on behalf of New York Lawyers for the Public Interest and Earthjustice. [Online]

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Woods, B. 2019. *Testimony on Eversource's Proposed East Eagle Street Substation*. Testimony to the Commonwealth of Massachusetts Department of Public Utilities on behalf of GreenRoots, Docket No. DPU 14-153A/14-154A. [Online]

CV dated May 2026

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-1.2b

Respondent: N. Foley

Page: 1 of 1

Question: 2. Please refer to the Direct Testimony of Neal Foley, p. 19 lines 18-20. b. What categories of "avoided costs realized through the Contracts" will DTE consider as part of "aggregate benefits?"

Answer: The Company considers as "avoided costs realized through the Contracts" any revenue requirement associated with resources that the Company was able to avoid deploying due to serving the Customer's load under the PSA and CCAA.

For example:

- As described by Witness Burgdorf, the Company's modeling indicates that it can avoid deploying 500 MW of energy storage in 2035 and 2036 due to serving the Customer's load under the PSA and CCAA.
- As described by Witness Bilyeu, the Company's modeling indicates it can avoid deploying 250 MW of renewable energy by 2034 due to serving the Customer's load under the PSA and CCAA.

The Company notes that its upcoming IRP filing will include a comparison of resource needs and associated costs with and without the Customer's load.

Attachment: *None*

Co-respondent(s): K. Bilyeu, S. Burgdorf

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-1.2d

Respondent: N. Foley

Page: 1 of 1

Question: 2. Please refer to the Direct Testimony of Neal Foley, p. 19 lines 18-20. d. How often and in what form will DTE compile information related to "combined revenues" and "avoided costs?"

Answer: See my revised direct testimony starting at page 41, line 23 for a discussion on how the PSA and CCAA will be reflected in future regulatory filings.

The Company envisions combined revenues and avoided costs will be presented in general rate case filings and PSCR plan and reconciliation filings. The Company will present an accounting of the aggregate benefits and costs of serving the Customer's load. The specific form of how this will be presented has not yet been developed.

Attachment: *None*

MPSC Case No: U-22058

Requester: CEOMEIBCIEI

Question No.: CEOMEIBCIEIDE-1.20b

Respondent: S. Burgdorf

Page: 1 of 1

Question: 20. Refer to the direct testimony of Shawn Burgdorf at page 12, Table 1. b. Please confirm if the 727 MW of "Proxy CCGT w/CCS" is being added because of the expiration of the ZRC contract and demand response.

Answer: Not confirmed. The proxy CCGT with CCS was added to meet the total system reliability requirement needs in 2033 in the context of analyzing resource adequacy requirements solely for purposes of performing the customer benefit analysis in this special contract matter. While the expiration of the ZRC contract and demand response are factored into the 2033 analysis, they do not define the 2033 system reliability requirements. Refer to questions 17 and 18 of my direct testimony.

Attachment: None.

Co-respondent: J. Brooks

MPSC Case No: U-22058

Requester: CEOMEIBCIEI

Question No.: CEOMEIBCIEIDE-1.21b

Respondent: Legal

Page: 1 of 1

Question: 21. Refer to the direct testimony of Shawn Burgdorf at page 12, lines 10–14.
b. Please explain if DTE has conducted feasibility studies for Carbon Capture and Sequestration.

Answer: DTE Electric objects for the reasons that the request seeks information that is not relevant to the issues presented in this special contract proceeding, is not proportional to the needs of the case, and is not reasonably calculated to lead to the discovery of admissible evidence. The request seeks to expand the scope of this proceeding to include issues reserved for IRPs, but this proceeding only concerns approval of the PSA and CCAA governing electric service to a specific large load customer. The Application does not seek approval of, nor does it propose, any CCS facility, CCS project, or CCS investment. Thus, Accordingly, whether DTE Electric has conducted feasibility studies for CCS, generally or in other contexts, has no bearing on the Company's relief requested or determinations made in this proceeding.

To the extent that references to CCS arise in this special contract matter, such limited references relate to a proxy CCGT with CCS utilized in the context of analyzing resource adequacy requirements solely for purposes of performing the customer benefit analysis. This generic modeling construct is not evidence of a proposed CCS project in this proceeding. The proxy resource was expressly identified as notional and illustrative, and no feasibility determination was required or relied upon for purposes of the customer benefit analysis.

Attachment: *None*

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-1.11

Respondent: S. Benyard

Page: 1 of 1

Question: 11. Please refer to the Direct Testimony of Steven N. Benyard, p. 6 line 23 to p. 7 line 3, and explain why costs exceeding $50 million for electric infrastructure upgrades to serve the Customer will be added to DTE's rate base for recovery rather than directly assigned to the Customer.

Answer: Under the terms of the agreement, the Company cannot directly assign more than $50 million of electric infrastructure costs to the Customer. As such, the Company would propose such amounts (i.e., costs greater than what has been directly received from the customer) to be recovered through base rates. This approach would be consistent with how the Company recovers similar costs for other customer sited infrastructure.

As noted in Q17 of my testimony, the project estimated cost ranges from $29.1 million to $44.3 million, which is necessary to account for cost variability associated with the different configuration options still under consideration by the Customer.

Attachment: *None*

Co-respondent: N. Foley

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-2.5c

Respondent: N. Foley

Page: 1 of 1

Question: 5. Please refer to the Direct Testimony of Shawn D. Burgdorf, p. 11 lines 3-7:
c. Explain why the revenue requirement of the proxy CCGT is not directly assigned to the Customer.

Answer: The premise of the question is incorrect as it assumes the proxy CCGT will definitively be constructed and that its revenue requirement could be "assigned" to the Customer. While the Company has modeled a proxy CCGT with CCS for analytical purposes in this special contract proceeding, actual resources will be selected during the Company's upcoming Integrated Resource Planning (IRP) proceeding. Consistent with that process, all resources developed through the IRP process are planned and operated as part of the Company's integrated electric system and are used to serve all customers. Thus, the Company does not assign the revenue requirement of specific generation assets to individual customers.

As described by Witness Willis (Exhibit A-19), the special contracts are projected to deliver benefits to the Company's other customers. If at any time those benefits do not exceed the costs to serve customers, Section 5.1.3 of the PSA (described in my revised direct testimony starting on page 19, line 15) is in effect during the term of the PSA to ensure the Customer is fully covering their costs.

Attachment: *None*

Co-Respondent(s): A. Willis

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-2.15a

Respondent: N. Foley

Page: 1 of 1

Question: 15. Please refer to the Company's Response to MNSDE-1.2c, the Direct Testimony of Aaron Willis at p. 7 lines 10-21, and Exhibit A-19. With regards to the "The revenue requirement of other resources identified in the IRP as being caused by the Customer's load" referenced in MNSDE-1.2c: a. Explain how the Company will decide whether a resource is "being caused by the Customer's load."

Answer: The Company will include in its Integrated Resource Plan ("IRP") modeling, an evaluation of the incremental impact of the Customer's load on system resource needs by comparing portfolios with and without that load and identifying the additional capacity or energy resources required to reliably serve total system demand.

Within this framework, resources described as being "caused by the Customer's load" reflect the incremental resource additions or changes in resource deployment identified through this comparative modeling. This identification is based on system-level needs and not a direct or exclusive assignment of individual assets to the Customer.

Consistent with this approach, all resources developed through the IRP process are planned and operated as part of an integrated electric system and are used to serve all customers. Thus, the characterization of certain resources as being "caused by the Customer's load" reflects the role of that load in driving incremental system requirements, rather than a one-to-one linkage between specific resources and the Customer. As with all IRP modeling outputs, the identification of incremental resources reflects scenario-based planning results and is not intended to represent a deterministic or exclusive causal assignment of specific facilities.

Attachment: *None.*

Co-Respondent(s): A. Willis, S. Burgdorf

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-1.4a

Respondent: N. Foley

Page: 1 of 1

Question: 4. Please refer to the Direct Testimony of Neal Foley, p. 23 lines 14-16. a. Noting that the testimony uses the language “up to,” under what circumstances would DTE deploy less than 480 MW of energy storage projects and 1,600 MW of renewable energy projects?

Answer: The Company has not developed a comprehensive list of specific situations that would lead to it not deploying the maximum 480 MW of energy storage projects and 1,600 MW of renewable energy projects. Several examples of such situations include:

- Due to potential variability in the size of projects bid into the Request for Proposal (RFP), the energy storage project portfolio cannot be configured to exactly match 480 MW, necessitating the deployment of less overall capacity
- Due to potential variability in project size, the renewable energy project portfolio cannot be configured to exactly match 1,600 MW, necessitating the deployment of less overall capacity

Attachment: *None*

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-2.10a

Respondent: K. Bilyeu

Page: 1 of 2

Question: 10. Please refer to the Company's Response to discovery request MNSDE-1.13a, b: a. Has DTE conducted any analyses or studies of the feasibility of acquiring sufficient land, obtaining interconnection rights, receiving permitting approvals, and completing the construction and/or contracting needed to achieve the annual renewable energy build plan amounts for 2028 through 2035 set forth in the Company's response to MNSDE-1.13a? If so, identify and produce such analyses and studies. If not, explain why not.

Answer: DTE Electric objects to the extent the request seeks information regarding Case No. U-21990 for the reasons that the request is overly broad, seeks excessive detail, and seeks information that is not relevant to the issues presented, is not proportional to the needs of the case, and is otherwise not reasonably calculated to lead to the discovery of admissible evidence. The request seeks documents or analyses not required by the relief requested in this proceeding, or seeks information related to separate proceedings beyond what is relevant or proportional to the needs of this case. This proceeding is limited to the approval of the special contracts governing electric service to the Customer. The Application does not seek any approval regarding Case No. U-21990 or the large load customer associated with that docket. Thus, the requested information regarding Case No. U-21990 has no bearing on the Company's relief requested or the determinations to be made in this proceeding. Subject to and without waiving the objections, the Company responds as follows:

DTE Electric has not conducted any project-specific analyses or studies regarding the feasibility of acquiring sufficient land, obtaining interconnection rights, receiving permitting approvals, or completing the construction and/or contracting necessary to achieve the annual renewable energy build plan amounts for 2028 through 2035 for projects intended to support the Customer, as referenced in MNSDE-1.13a.

The renewable build plan amounts identified in the Company's response to MNSDE 1.13a reflect system level planning assumptions developed for long term resource forecasting and do not represent project-specific feasibility assessments for Customer driven additions.

Co-respondent: Legal

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-2.10a

Respondent: K. Bilyeu

Page: 2 of 2

Upon approval of the special contracts between the Company and the Customer, the actual renewable energy resources capable of serving the Customer's needs will be identified through future planning and procurement processes. The Company will incorporate project-specific information regarding feasibility, timing, and procurement details, into its Amended REP, which the Company expects to file later this year.

Attachment: *None*

Co-respondent: Legal

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-2.12b

Respondent: K. Bilyeu

Page: 1 of 1

Question: 12. Please refer to the Direct Testimony of Kevin Bilyeu at p. 16 lines 10-12. With regards to the statement that the "Company's existing renewable energy portfolio and development pipeline offer a credible and sufficient foundation to meet the elevated renewable energy targets": b. Explain how the "Company's existing renewable energy portfolio and development pipeline offer a credible and sufficient foundation" for the Company to meet the "elevated renewable energy targets" that would result from the Customer's incremental load.

Answer: DTE Electric objects to this request to the extent that it is overly broad and seeks information that is not relevant to the issues presented, is not proportional to the needs of the case, and is otherwise not reasonably calculated to lead to the discovery of admissible evidence. The requested analyses or conclusions regarding the achievement of particular levels of renewable development and project-specific feasibility determinations or assurances regarding future development outcomes are not required for support of the relief requested in this proceeding. Subject to and without waiving the objections, the Company responds as follows:

The Company already operates a substantial base of renewable resources and maintains a robust set of projects in various stages of development. Together, these operating assets and additions give the Company the flexibility to scale renewable capacity in line with the Customer's load growth, supported by the Company's demonstrated history of successfully developing renewable projects and by long-term resource plans that already anticipate higher levels of renewable generation.

Attachment: *None.*

Co-respondent: Legal

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-1.13a

Respondent: K. Bilyeu

Page: 1 of 1

Question: 13. Please refer to the Direct Testimony of Kevin L. Bilyeu, Part IV: DTE Electric's Strategy and Build Plan. a. What are the annual renewable energy build plan amounts for 2028 through 2035 taking into account: (1) the 1.6 GW contemplated in this proceeding, (2) the assumed 1.8 GW as part of the special contracts in U-21990, and (3) the most recently approved Renewable Energy Plan?

Answer: Please refer to the below table:

Case	2028	2029	2030	2031	2032	2033	2034	2035
U-21662	420	700	700	1000	600	1000	1000	1000
U-21990			662	331	808			
U-22058			500	700	400	(200)	(50)	

Attachment: *None.*

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-3.14

Respondent: Legal

Page: 1 of 1

Question: 14. Please refer to the Company's response to MNS 2.12b, where the Company asserts that it will be able to meet its elevated renewable energy targets because "The Company already operates a substantial base of renewable resources and maintains a robust set of projects in various stages of development." Please provide detailed information regarding the "robust set of projects in various stages of development"—anonymized as needed—including project type, project size, project location, and current stage of development.

Answer: DTE Electric objects to this request on grounds that it is overly broad, seeks excessive information, and seeks information that is not relevant to the issues presented, is not proportional to the needs of the case, and is otherwise not reasonably calculated to lead to the discovery of admissible evidence. The requested information regarding the achievement of particular levels of renewable development and project-specific feasibility determinations or assurances regarding future development outcomes are not required for support of the relief requested in this proceeding.

Attachment: *None*

MPSC Case No: U-22058

Requester: CEOMEIBCIEI

Question No.: CEOMEIBCIEIDE-1.41a

Respondent: N. Foley

Page: 1 of 1

Question: 41. Refer to the direct testimony of Neal Foley at pages 16–17, lines 14–16; 1–7, which states that the "...PSA addresses a situation where the Company cannot meet the Customer's load ramp or max load due to any of the following conditions: (1) The CCAA or Rider 12 DR Agreement is terminated, (2) The Company is unable to achieve or maintain the Customer's load ramp or max load due to reasons not attributable to the Company; (3) The Company is unable to achieve or maintain the Customer's load ramp or max load due to the Customer's underperformance or nonperformance under any agreement with the Company; and/or (4) The Company determines that the energy storage portfolio being deployed under the CCAA is not feasible." Foley then states at page 17, lines 9–14 that: "If any of the above conditions are true, the Company and the Customer will meet to negotiate a solution that could include, for example, an adjustment to the resources being deployed under the CCAA, an adjustment to the Customer's load ramp or max load, and/or a pass-through mechanism whereby the cost of incremental MISO market purchases needed to meet the Customer's load ramp or max load are passed directly to the Customer." a. Please provide details and specific situations that the Company envisions would lead it to not procuring the proposed solar, storage, or demand response.

Answer: The Company has not developed a comprehensive list of specific situations that would lead to it not procuring the proposed solar, storage, or demand response. Several examples of such situations include:

- Supply chain shortages impacting the ability to deploy energy storage or renewable energy projects
- Permitting constraints impacting the ability to site energy storage or renewable energy projects
- MISO queue constraints impacting the ability to interconnect energy storage or renewable energy projects
- Loss of demand response accreditation due to Customer underperformance

Attachment: *None*

Co-respondent(s): S. Burgdorf, K. Bilyeu

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-2.14a

Respondent: K. Bilyeu

Page: 1 of 1

Question: 14. Please refer to the Company's Response to MNSDE-1.2c, the Direct Testimony of Aaron Willis at p. 7 lines 10-21, and Exhibit A-19. With regards to the "costs of serving the Customer's load" referenced in MNSDE-1.2c: a. Identify, in MW, the amount of renewable energy projects "not covered by the CCAA" that the Company projects will need to be deployed to meet the Company's RPS obligations.

Answer: As set forth in Exhibit A-2 and explained in my direct testimony, page KLB-10, lines 8-25, the Company does not project that additional renewable energy projects will need to be deployed to meet its Renewable Portfolio Standard ("RPS") obligations as a result of the Customer's load. Specifically, the Company's analysis reflects a reduction in incremental renewable energy capacity requirements (approximately 250 MW) relative to a scenario without the Customer's load. Accordingly, there are no incremental renewable energy projects not covered by the CCAA identified for RPS compliance that would be attributable to the Customer's load.

Attachment: *None.*

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-1.12a

Respondent: K. Bilyeu

Page: 1 of 1

Question: 12. Please refer to the Direct Testimony of Kevin L. Bilyeu, p. 11 lines 7-10. a. Please explain the basis for DTE's assumption that 1.8 GW of renewable energy will be achieved from its special contracts with the data center customer pursuant to Case No. U-21990.

Answer: As explained in the Direct Testimony of Kevin L. Bilyeu in Case No. U-21990 (p. 13, lines 1–3), the additional renewable energy capacity needed to satisfy the higher RPS requirements associated with the first data center customer could range from 443 MW, if the Company fully utilizes its projected REC bank, up to 3.2 GW. The 1.8 GW figure was used in the affordability benefit calculation in Case No. U-21990 and represents a reasonable midpoint between these two scenarios. Pages 10 and 11 of that testimony further describe the Company's expectation that sufficient renewable energy projects will be available to meet the increased RPS target. Page 43 of the December 18, 2025 Order in Case U-21990 states that the Company shall file an amended renewable energy plan with its next integrated resource plan and clean energy plan, which will provide the detailed information.

Attachment: *None.*

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-3.13

Respondent: K. Bilyeu

Page: 1 of 1

Question: 13. Please refer to the Company's response to MNS 1.12a and MNS 1.13a, where the Company provides additional details relating to its annual renewable energy build plan. In Case No. 21990, the Company identified 1.8 GW (or 1,800 MW) as a "reasonable midpoint" for estimated renewable energy capacity needs with the first data center customer ranging from 443 MW up to 3.2 GW. Please provide a recalculation of Line 37 ("Energy Credit Ending Balance") in DTE Exhibit A-2, and an accompanying calculation breakdown similar to the information presented in Lines 21 through 28 for the lower and upper bounds of this range, i.e. 442 MW and 3.2 GW.

Answer: DTE Electric objects for the reasons that the request is overly broad, seeks excessive detail, and seeks information that is not relevant to the issues presented, is not proportional to the needs of the case, and is otherwise not reasonably calculated to lead to the discovery of admissible evidence. The request seeks documents or analyses not required by the relief requested in this proceeding, or seeks information related to separate proceedings beyond what is relevant or proportional to the needs of this case. The request seeks to unreasonably expand the scope of this proceeding, as this proceeding only concerns approval of the special contracts governing electric service to the Customer. The Application does not seek any approval regarding Case No. U-21990 or the large load customer associated with that docket. Thus, the requested information has no bearing on the Company's relief requested or the determinations to be made in this proceeding. Subject to and without waiving the foregoing objections, the Company responds as follows: This analysis has not been completed.

Attachment: *None.*

Co-respondent: Legal

EXHIBIT MEC-16

RESERVED

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-2.21ai

Respondent: N. Foley

Page: 1 of 1

Question: 21. Please refer to the Company's response to STDE-1.16 and to MNSDE-1.2c. a. State whether the Company will provide in future rate cases, or any other docket, a reconciliation of Customer revenues and any of the following incremental costs or resource revenue requirements caused by serving the Customer's load: i. The revenue requirement of renewable energy projects deployed to meet the Company's Renewable Portfolio Standard (RPS) obligations not covered by the CCAA.

Answer: The Company notes that the reconciliation discussed in response to STDE-1.16 is specific to energy storage and renewable energy projects deployed under the CCAA and does not apply to resources not deployed under that agreement.

Assuming that "reconciliation" in this request refers to the presentation of aggregate costs and benefits discussed in MNSDE-1.2c and my revised direct testimony (Q38), see MNSDE-1.2d for additional detail on the presentation of aggregate benefits and aggregate costs of serving the Customer's load. The Company notes that the specific form of how aggregate costs and benefits will be presented has not yet been developed.

As described in response to MNSDE-2.14a, the Company does not currently project that incremental renewable energy projects not covered by the CCAA are required to meet RPS obligations as a result of the Customer's load. The Company intends to evaluate in its forthcoming Amended REP whether any incremental RPS compliance costs to serve the Customer's load arise outside of the CCAA. To the extent that such costs arise, they would be presented as part of aggregate costs of serving the Customer's load.

Attachment: *None*

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-2.21aiv

Respondent: N. Foley

Page: 1 of 1

Question: 21. Please refer to the Company's response to STDE-1.16 and to MNSDE-1.2c. a. State whether the Company will provide in future rate cases, or any other docket, a reconciliation of Customer revenues and any of the following incremental costs or resource revenue requirements caused by serving the Customer's load: iv. The revenue requirement of transmission investments.

Answer: The Company notes that the reconciliation discussed in response to STDE-1.16 is specific to energy storage and renewable energy projects deployed under the CCAA and does not apply to resources not deployed under that agreement.

Assuming that "reconciliation" in this request refers to the presentation of aggregate costs and benefits discussed in MNSDE-1.2c and my revised direct testimony (Q38), see MNSDE-1.2d for additional detail on the presentation of aggregate benefits and aggregate costs of serving the Customer's load. The Company notes that the specific form of how aggregate costs and benefits will be presented has not yet been developed.

The Company notes that transmission costs are incurred and recovered on a system-wide basis through charges established by the transmission provider and applicable tariffs and are not billed to the Company on a project-specific basis for purposes of ratemaking. Accordingly, in the context of presenting aggregate costs, including in future PSCR proceedings, any transmission-related costs associated with serving the Customer's load would be calculated based on actual project capital costs used to estimate the revenue requirement.

To the extent that such costs arise in future PSCR proceedings, they would be presented as an estimate and included in the aggregate costs of serving the Customer's load.

Attachment: *None*

Co-Respondent: S. Burgdorf

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-1.7c

Respondent: N. Foley

Page: 1 of 1

Question: 7. Please refer to the CCAA (Exhibit A-18) introduced through the Direct Testimony of Neal Foley at p. 9. c. In the event the Customer and DTE are unable to agree on measures pursuant to Section 4.1.10.2, how will DTE determine whether incremental costs incurred in meeting the renewable portfolio standard "are attributable to Customer's load?"

Answer: The Customer's load will have a quantifiable impact on the Company's RPS obligations as defined in MCL 460.1028. For example, all else equal, every 100 MWh of Customer load that is not covered by a VGP agreement requires the Company to deploy renewable energy resources that generate 60 MWh (i.e., 100 MWh of Customer load multiplied by 60% RPS requirement starting in 2035).

As such, the Company will be able to attribute RPS obligations to the Customer's load. Likewise, the Company will be able to attribute the associated resource cost of those RPS obligations to the Customer's load.

Attachment: *None*

Co-respondent: K. Bilyeu

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-4.1a

Respondent: N. Foley

Page: 1 of 1

Question: 1. Please refer to the Rebuttal Testimony of Neal Foley, p. 14 lines 17-25 to p. 15 lines 1-7:
a. Please confirm that distribution costs to serve the Customer's load will be included in the affordability benefit analysis.

Answer: Confirmed to the extent that there are any recoverable distribution costs. However, the Company does not expect there to be any recoverable distribution costs because the Customer is building their own substation and contributing up to $50 million toward the Company's on-site distribution upgrades, an amount that exceeds the expected cost of these upgrades.

Attachment: *None*

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-4.2a

Respondent: N. Foley

Page: 1 of 1

Question: 2. Please refer to the Rebuttal Testimony of Neal Foley, p. 23 line 2 ("By April 15 of each year, the Company will provide a report covering the previous calendar year."):
a. Please confirm that the "report" will be presented during a contested proceeding.

Answer: Partially confirmed. As stated in my rebuttal testimony, "during future rate cases and PSCR proceedings the Company would present aggregate costs and benefits of serving the Customer such that the Commission could determine if aggregate benefits exceed aggregate costs" (page 24, line 18). Both rate cases and PSCR proceedings are contested proceedings.

As it relates specifically to the separate report to be filed on April 15, as stated in my rebuttal testimony, "[t]he Company does not take a view on the appropriate docket for the report, but notes that Customer information is considered confidential and will need to be protected as such" (page 23, line 23). However, a separate standalone case for the April 15 report would be redundant since aggregate costs and benefits would be presented in rate cases and PSCR proceedings as described above, both of which are contested proceedings.

Attachment: *None*

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-4.2b

Respondent: N. Foley

Page: 1 of 1

Question: 2. Please refer to the Rebuttal Testimony of Neal Foley, p. 23 line 2 ("By April 15 of each year, the Company will provide a report covering the previous calendar year."):
b. Please confirm that each category of costs, avoided costs, and benefits will be reported separately.

Answer: Assuming the question is referring generally to the costs, avoided costs, and benefits discussed in Question 17 of my rebuttal testimony, then confirmed.

Attachment: *None*

EXHIBIT MEC-21

RESERVED

EXHIBIT MEC-22

RESERVED

EXHIBIT MEC-23

RESERVED

EXHIBIT MEC-24

RESERVED

EXHIBIT MEC-25

RESERVED

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-2.12a

Respondent: K. Bilyeu

Page: 1 of 1

Question: 12. Please refer to the Direct Testimony of Kevin Bilyeu at p. 16 lines 10-12. With regards to the statement that the "Company's existing renewable energy portfolio and development pipeline offer a credible and sufficient foundation to meet the elevated renewable energy targets": a. Describe the "development pipeline" referred to by Witness Bilyeu.

Answer: The development pipeline refers to potential future renewable energy projects in various stages of evaluation, development, or acquisition. As referenced in my direct testimony, the Company's development pipeline reflects potential opportunities that support system-level planning and resource forecasting and is not limited to a fixed or fully defined set of projects.

Attachment: *None.*

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-2.12b

Respondent: K. Bilyeu

Page: 1 of 1

Question: 12. Please refer to the Direct Testimony of Kevin Bilyeu at p. 16 lines 10-12. With regards to the statement that the "Company's existing renewable energy portfolio and development pipeline offer a credible and sufficient foundation to meet the elevated renewable energy targets": b. Explain how the "Company's existing renewable energy portfolio and development pipeline offer a credible and sufficient foundation" for the Company to meet the "elevated renewable energy targets" that would result from the Customer's incremental load.

Answer: DTE Electric objects to this request to the extent that it is overly broad and seeks information that is not relevant to the issues presented, is not proportional to the needs of the case, and is otherwise not reasonably calculated to lead to the discovery of admissible evidence. The requested analyses or conclusions regarding the achievement of particular levels of renewable development and project-specific feasibility determinations or assurances regarding future development outcomes are not required for support of the relief requested in this proceeding. Subject to and without waiving the objections, the Company responds as follows:

The Company already operates a substantial base of renewable resources and maintains a robust set of projects in various stages of development. Together, these operating assets and additions give the Company the flexibility to scale renewable capacity in line with the Customer's load growth, supported by the Company's demonstrated history of successfully developing renewable projects and by long-term resource plans that already anticipate higher levels of renewable generation.

Attachment: *None.*

Co-respondent: Legal

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-2.12c

Respondent: K. Bilyeu

Page: 1 of 1

Question: 12. Please refer to the Direct Testimony of Kevin Bilyeu at p. 16 lines 10-12. With regards to the statement that the "Company's existing renewable energy portfolio and development pipeline offer a credible and sufficient foundation to meet the elevated renewable energy targets": c. Identify and produce any analysis, study, or other documentation supporting the contention that the Company has a "credible and sufficient foundation to meet the elevated renewable energy targets."

Answer: DTE Electric objects to this request to the extent that it is overly broad and seeks information that is not relevant to the issues presented, is not proportional to the needs of the case, and is otherwise not reasonably calculated to lead to the discovery of admissible evidence. The requested analyses or conclusions regarding the achievement of particular levels of renewable development and project-specific feasibility determinations or assurances regarding future development outcomes are not required for support of the relief requested in this proceeding. Subject to and without waiving the objections, the Company responds as follows:

Please see response to MNSDE-2.12b and the Company's most recent Amended REP, Case No. U-21662.

Attachment: *None.*

Co-respondent: Legal

EXHIBIT MEC-27

RESERVED

MPSC Case No: U-22058

Requester: CEO

Question No.: CEOMEIBCIEIDE-3.2

Respondent: K. Bilyeu

Page: 1 of 1

Question: 2. Refer to Exhibit A-2. The native excel file does not include formulas for line 37, and the included workpapers do not indicate the source of the data on line 37. Please provide a copy of Exhibit A-2 including formulas for line 37, and/or provide an additional workpaper demonstrating how the data in line 37 was calculated.

Answer: Please refer to attachment *U-22058 CEOMEIBCIEIDE-3.2 REC Balance*, which includes additional lines to show the formula for the REC balance. It is calculated in the same method as Line 29, but with additional generated RECs related to the 1800 MW approved for the customer in U-21990, and 1600 MW of VGP and a reduction of 250 MW as requested in this case.

Attachment: *U-22058 CEOMEIBCIEIDE-3.2 REC Balance*

Michigan Public Service Commission — Case No.: U-22058
DTE Electric Company — Exhibit: A-2
Renewable Portfolio Standard Compliance Summary — Witness: K.L. Bilyeu
U-22058 CEOMEIBCIEIDE-3.2 REC Balance — Page: 1 of 2
CEOMEIBCIEIDE-3.2

Case No.: U-22058
Exhibit: A-2
Witness: K.L. Bilyeu
Page: 2 of 2

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)	(r)	(s)	(t)	(u)	(v)
Line No.			**2026**	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	**2037**	**2038**	**2039**	**2040**	**2041**	**2042**	**2043**	**2044**	**2045**
1	**Sales and Requirement Calculation**	**Source**																				
2	**Method: Weather Normalized or 3 Year Average**																					
3	If Selected Weather Normalized:																					
4	Current Year Sales to Retail Customers	U-21662 Exh A-29 Column (i)	39,634,892	39,497,918	39,869,525	39,910,589	40,013,252	40,203,583	40,511,120	40,702,673	41,076,945	41,418,790	41,796,601	41,972,411	42,220,700	42,421,326	42,654,688	42,699,590	42,849,878	43,041,817	43,325,884	43,439,572
5	Incremental First Data Center Customer Load	U-21990	3,285	5,031,963	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572
6	Incremental Second Data Center Customer Load	WP-1	-	33,480	3,300,480	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000
7	Less Number of Megawatt Hours Sold from Michigan Nuclear Energy		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Current Year Weather Normalization Factor		1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
9	Less VGP sales	U-21662 WP-6	2,794,617	5,358,090	6,616,223	7,426,909	7,415,003	7,385,969	7,375,761	7,328,315	7,299,690	7,271,202	7,261,222	7,214,626	7,186,536	7,158,575	7,148,812	7,103,051	7,075,484	7,048,047	7,038,504	6,993,562
10	Less Incremental VGP Sales	WP-1	-	-	-	-	997,527	2,398,048	3,203,084	3,178,360	3,162,468	3,146,656	3,139,501	3,115,268	3,099,692	3,084,193	3,077,180	3,053,429	3,038,161	3,022,971	3,016,097	2,992,817
11	Less Outflow from DG Customers	U-21662 Exh A-29 Column (j)	55,355	68,099	83,171	100,829	121,202	143,020	164,705	185,876	204,715	222,048	239,754	257,838	276,311	295,137	313,920	332,890	352,794	373,097	393,673	414,458
12	Current Year Weather Normalized Sales	Calculated	36,788,205	39,137,172	47,374,183	51,170,422	50,267,091	49,064,118	48,555,143	48,797,693	49,197,643	49,566,457	49,943,696	50,172,251	50,445,733	50,670,992	50,902,347	50,997,792	51,171,010	51,385,273	51,665,183	51,826,308
13	If Selected 3 Year Average:																					
14	Current Year Retail Sales to Retail Customers																					
15	Less Number of Megawatt Hours Sold from Michigan Nuclear Energy																					
16	Less VGP sales																					
17	Less outflow from DG customers																					
18	3 Year Average of sales																					
19	RPS Required Energy Credits (For 2026 through 2029 15%, 2030 through 2034 50% 2035 and beyond 60%)	Calculated	5,667,532	5,518,231	5,870,576	7,106,127	25,585,211	25,133,545	24,532,059	24,277,571	24,398,847	29,518,586	29,739,874	29,966,218	30,103,350	30,267,440	30,402,595	30,541,408	30,598,675	30,702,606	30,831,164	30,999,110
20	**Energy Credits**																					
21	Energy Credit Beginning Balance	Line 29	2,455,332	2,833,451	5,401,814	9,327,780	15,308,233	5,072,900	(2,451,067)	(8,173,568)	(11,708,730)	(13,312,505)	(17,605,592)	(20,860,040)	(21,739,132)	(20,104,865)	(16,009,553)	(9,319,900)	(238,954)	11,275,395	22,809,220	33,986,930
22	Plus: Energy Credits Obtained Through Generation/BOT	U-21662 Exh A-4 +WP-4	3,405,313	4,785,213	5,979,683	7,689,837	9,356,714	11,743,705	13,258,615	15,574,681	17,938,444	20,437,898	23,189,448	25,812,563	28,475,980	31,113,974	33,847,982	36,399,106	38,902,443	39,038,455	38,815,294	38,478,159
23	Plus: Energy Credits Obtained Through PPA	U-21662 Exh A-4 +WP-4	2,356,962	3,025,469	3,451,320	4,117,483	4,736,487	4,639,271	4,337,065	3,947,786	3,380,699	3,300,608	3,295,979	3,274,563	3,261,638	3,248,777	3,244,266	3,223,249	3,210,581	3,197,976	3,193,581	3,172,955
24	Plus: Energy Credits Obtained Through REC Purchases[1]	U-21662 Exh A-4 Line 7	283,377	275,912	365,538	1,279,261	1,256,677	1,226,603	1,213,879	1,219,942	1,475,929	1,486,994	-	-	-	-	-	-	-	-	-	-
25	Less: Energy Credits Sold		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26	Available Energy Credits (Lines 21 + 22 + 23 + 24 - 25)	Calculated	8,500,983	10,920,045	15,198,356	22,414,360	30,658,111	22,682,478	16,358,491	12,568,841	11,086,342	11,912,994	8,879,834	8,227,086	9,998,486	14,257,886	21,082,695	30,302,455	41,874,071	53,511,826	64,818,094	75,638,043
27	Less: Compliance Requirement (Line 19)	Calculated	5,667,532	5,518,231	5,870,576	7,106,127	25,585,211	25,133,545	24,532,059	24,277,571	24,398,847	29,518,586	29,739,874	29,966,218	30,103,350	30,267,440	30,402,595	30,541,408	30,598,675	30,702,606	30,831,164	30,999,110
28	Less: Energy Credit Expired		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Energy Credit Ending Balance (Lines 26 - 27 - 28)	Calculated	2,833,451	5,401,814	9,327,780	15,308,233	5,072,900	(2,451,067)	(8,173,568)	(11,708,730)	(13,312,505)	(17,605,592)	(20,860,040)	(21,739,132)	(20,104,865)	(16,009,553)	(9,319,900)	(238,954)	11,275,395	22,809,220	33,986,930	44,638,934
30	**Base Case without Data Center Load**																					
31	RPS Required Energy Credits (For 2026 through 2029 15%, 2030 through 2034 50% 2035 and beyond 60%)	U-21662 Exh A-2 Line 16	5,667,532	5,517,738	5,110,759	4,975,520	16,191,425	16,238,523	16,337,297	16,485,327	16,594,241	20,143,524	20,355,325	20,577,375	20,699,968	20,854,712	20,980,568	21,115,173	21,158,189	21,252,960	21,372,403	21,536,224
32	Energy Credit Ending Balance	U-21662 Exh A-2 Line 26	2,833,451	5,402,282	9,978,064	17,058,641	15,769,987	16,726,366	18,801,613	22,663,019	28,217,633	32,819,791	39,967,659	49,506,278	61,578,926	76,129,701	93,290,409	112,853,350	134,866,094	156,912,213	178,617,304	199,809,005
33	**Updated RPS**																					
34	Required RECs adjusted to include First Data Center Customer	U-21990 Exh A-3 Line 16	5,667,532	5,518,231	5,865,554	6,611,055	21,643,211	21,690,309	21,789,083	21,937,113	22,046,027	26,685,667	26,897,468	27,119,518	27,242,111	27,396,855	27,522,711	27,657,316	27,700,333	27,795,103	27,914,546	28,078,367
35	Required RECs adjusted to include both Data Center Customers	Line 19	5,667,532	5,518,231	5,870,576	7,106,127	25,585,211	25,133,545	24,532,059	24,277,571	24,398,847	29,518,586	29,739,874	29,966,218	30,103,350	30,267,440	30,402,595	30,541,408	30,598,675	30,702,606	30,831,164	30,999,110
36	**With Additional 1800 MW for First Customer (Case U-21990) and 1600 MW VGP for Second Customer**																					
37	Energy Credit Beginning Balance	Line 45	2,455,332	2,833,451	5,401,814	9,317,548	15,298,001	6,794,075	1,859,360	686,444	1,459,343	3,572,386	2,693,688	2,854,161	5,403,494	10,459,073	17,958,589	28,044,705	40,495,900	55,363,645	70,234,099	84,740,852
38	Plus: Energy Credits Obtained Through Generation/BOT	U-21662 Exh A-4 +WP-4 modified for additional MW	3,405,313	4,785,213	5,979,683	7,689,837	11,088,121	14,332,956	17,808,199	19,882,742	21,655,262	23,852,287	26,604,368	29,240,988	31,897,291	34,518,178	37,244,446	39,769,354	42,255,840	42,375,084	42,144,336	41,781,505
39	Plus: Energy Credits Obtained Through PPA	Line 23	2,356,962	3,025,469	3,451,320	4,117,483	4,736,487	4,639,271	4,337,065	3,947,786	3,380,699	3,300,608	3,295,979	3,274,563	3,261,638	3,248,777	3,244,266	3,223,249	3,210,581	3,197,976	3,193,581	3,172,955
40	Plus: Energy Credits Obtained Through REC Purchases[1]	Line 24	283,377	275,912	355,306	1,279,261	1,256,677	1,226,603	1,213,879	1,219,942	1,475,929	1,486,994	-	-	-	-	-	-	-	-	-	-
41	Less: Energy Credits Sold		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
42	Available Energy Credits (Lines 37 + 38 + 39 + 40 - 41)	Calculated	8,500,983	10,920,045	15,188,124	22,404,129	32,379,286	26,992,906	25,218,503	25,736,914	27,971,232	32,212,274	32,594,035	35,369,712	40,562,423	48,226,028	58,447,301	71,037,308	85,962,321	100,936,706	115,572,016	129,695,312
43	Less: Compliance Requirement (Line 19)	Calculated	5,667,532	5,518,231	5,870,576	7,106,127	25,585,211	25,133,545	24,532,059	24,277,571	24,398,847	29,518,586	29,739,874	29,966,218	30,103,350	30,267,440	30,402,595	30,541,408	30,598,675	30,702,606	30,831,164	30,999,110
44	Less: Energy Credit Expired		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
45	Energy Credit Ending Balance (Lines 42 - 43 - 44)	Calculated	2,833,451	5,401,814	9,317,548	15,298,001	6,794,075	1,859,360	686,444	1,459,343	3,572,386	2,693,688	2,854,161	5,403,494	10,459,073	17,958,589	28,044,705	40,495,900	55,363,645	70,234,099	84,740,852	98,696,202

1. Updated to represent 5% of RPS requirement through 2035

			2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
	Data Center 1 (MWh)		3,285	5,031,963	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572
	Data Center 2 (MWh)		0	33,480	3,300,480	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000	7,884,000
	Total Data Center Load (MWh)		3,285	5,065,443	14,204,052	18,787,572	18,787,572	18,787,572	18,787,572	18,787,572	18,787,572	18,787,572	18,787,572	18,787,572	18,787,572	18,787,572	18,787,572	18,787,572	18,787,572	18,787,572	18,787,572	18,787,572
	Data Center 2 - VGP Portion																					
	Cumulative Build Capacity (MW)			0	0	0	500	1,200	1,600	1,600	1,600	1,600	1,600	1,600	1,600	1,600	1,600	1,600	1,600	1,600	1,600	1,600
	Available for customer (MWh)						997,527	2,398,048	3,203,084	3,178,360	3,162,468	3,146,656	3,139,501	3,115,268	3,099,692	3,084,193	3,077,180	3,053,429	3,038,161	3,022,971	3,016,097	2,992,817

		2026	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**
	2030 Data Center Solar					662.4				
	2030 Data Center Solar - VGP					500.0				
	2031 Data Center Solar						331.5			
	2031 Data Center Solar - VGP						700.0			
	2032 Data Center Solar							808.8		
	2032 Data Center Solar - VGP							400.0		
	2033 Data Center Solar								(200.0)	
	2034 Data Center Solar									(50.0)

Michigan Public Service Commission
DTE Electric Company
2024 Amended REP
Renewable Energy Plan Summary

Case No.: U-21662
Exhibit: A-2
Witness: K.L. Bilyeu
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Line No.	(a)	(b)	Prelim (c) 2022	Prelim (d) 2023	(e) 2024	(f) 2025	(g) 2026	(h) 2027
1	**Sales and Requirement Calculation**	**Source**						
2	**Method: Weather Normalized or 3 Year Average**							
3	If Selected Weather Normalized:							
4	Current Year Sales to Retail Customers	Exh A-29 Column (i)	40,609,620	40,314,687	39,914,445	39,800,480	39,634,892	39,497,918
5	Less Number of Megawatt Hours Sold from Michigan Nuclear Energy		-	-	-	-	-	-
6	Current Year Weather Normalization Factor	Exh A-29 Column (i)	1.00	1.00	1.00	1.00	1.00	1.00
7	Less VGP sales	WP-6		1,184,525	1,315,354	1,972,144	2,794,617	5,358,090
8	Less Outflow from DG Customers			-	36,177	44,791	55,355	68,099
9	Current Year Weather Normalized Sales		40,609,620	39,130,162	38,562,915	37,783,546	36,784,920	34,071,729
10	If Selected 3 Year Average:							
11	Current Year Retail Sales to Retail Customers							
12	Less Number of Megawatt Hours Sold from Michigan Nuclear Energy							
13	Less VGP sales							
14	Less outflow from DG customers							
15	3 Year Average of sales							
16	RPS Required Energy Credits (For 2024 through 2029 15%, 2030 through 2034 50% 2035 and beyond 60%)	Calculated	6,166,087	6,091,443	5,869,524	5,784,437	5,667,532	5,517,738
17	**Energy Credits**							
18	Energy Credit Beginning Balance	Row 26	4,707,071	3,765,317	2,857,740	2,661,734	2,455,332	2,833,451
19	Plus: Energy Credits Obtained Through Generation/BOT	Exh A-4 +WP-4 KLB (IRECs)	3,480,765	3,292,553	3,564,334	3,448,305	3,405,313	4,785,213
20	Plus: Energy Credits Obtained Through PPA	Exh A-4 +WP-4 KLB (IRECs)	1,743,568	1,555,236	1,815,708	1,840,508	2,356,962	3,025,469
21	Plus: Energy Credits Obtained Through REC Purchases	Exh A-4 line 7	-	336,077	293,476	289,222	283,377	275,887
22	Less: Energy Credits Sold		-	-	-	-	-	-
23	Available Energy Credits (Rows 18 + 19 + 20 + 21 - 22)	Calculated	9,931,404	8,949,183	8,531,259	8,239,769	8,500,983	10,920,020
24	Less: Compliance Requirement (Row 16)	Calculated	6,166,087	6,091,443	5,869,524	5,784,437	5,667,532	5,517,738
25	Less: Energy Credit Expired		-	-	-	-	-	-
26	Energy Credit Ending Balance (Rows 23 - 24 - 25)	Calculated	3,765,317	2,857,740	2,661,734	2,455,332	2,833,451	5,402,282
27	**Revenue Requirement**							
28	Cost of Renewable Energy Generation/BOT (1)	Exh A-23 line 24 - lines 15,16&22	$ 373,427,207	$ 404,009,702	$ 505,078,243	$ 676,929,551	$ 934,234,714	$ 1,252,223,498
29	Cost of Renewable Energy PPA	Exh A-23 line 15	$ 108,366,168	$ 98,164,158	$ 113,197,489	$ 114,167,198	$ 148,768,592	$ 209,966,187
30	Cost of Renewable Energy Credit Purchases	Exh A-23 line 16	$ 1,955,599	$ 1,298,469	$ 4,059,509	$ 2,588,758	$ 2,900,279	$ 3,304,569
31	Costs of Administration of Renewable Energy Plan	ATT-1 PDK line 2	$ -	$ 515,328	$ 528,212	$ 541,417	$ 554,952	$ 568,826
32	Less: Revenue obtained from Renewable Energy Sales (non-retail)							
33	REP Total Revenue Requirement (Rows 28 + 29 + 30 + 31 - 32)	Calculated	$ 483,748,974	$ 503,987,658	$ 622,863,453	$ 794,226,923	$ 1,086,458,537	$ 1,466,063,080
34	**Cost Recovery**							
35	Forecasted Transfer Price per MWH	Exh A-21 line 152 / line 151	$ 78.70	$ 81.48	$ 82.17	$ 83.17	$ 82.99	$ 80.43
36	MWH of Renewable Energy	Exh A-21 line 151	4,377,142	3,802,808	4,448,838	4,576,372	5,028,893	6,711,796
37	Amount Recovered Through the PSCR	Exh A-21 line 14	$ 328,689,309	$ 309,836,315	$ 365,541,300	$ 380,621,882	$ 417,344,692	$ 539,801,654
38	Federal Tax Impacts (including PTC/ITC/TCJA Remeasurement) (1)	Exh A-22 line 10, 11, 12, and 23	$ 115,230,057	$ 111,137,751	$ 105,753,446	$ 263,175,736	$ 317,561,949	$ 342,748,102
39	Revenue from Voluntary Green Pricing Programs (2)	Exh A-22 line 14, 15 and 18	$ 50,446,783	$ 57,426,632	$ 65,031,080	$ 105,487,777	$ 159,399,224	$ 311,969,951
40	AFUDC Impacts	Exh A-22 line 36, 37, 38, 39, 40	$ -	$ 10,745,069	$ 101,123,590	$ 177,859,418	$ 272,445,425	$ 198,087,992
41	Incremental Cost of Compliance (Rows 33 - 40)	Calculated	$ (10,617,175)	$ 14,841,891	$ (14,585,963)	$ (132,917,889)	$ (80,292,753)	$ 73,455,381
42	**Non-Volumetric Meter/Customer Charge Forecast**							
43	Residential		$ -	$ -	$ -	$ -	$ -	$ -
44	Secondary		$ -	$ -	$ -	$ -	$ -	$ -
45	Primary		$ -	$ -	$ -	$ -	$ -	$ -
46	Other		$ -	$ -	$ -	$ -	$ -	$ -
47	**Meter/Customer Count**							
48	Residential	Exh A-26 Column (b)	2,047,591	2,055,845	2,064,797	2,074,827	2,084,117	2,092,054
49	Secondary	Exh A-26 Column (c)	207,478	208,286	209,555	210,629	211,588	212,397
50	Primary	Exh A-26 Column (d)	2,816	2,823	2,818	2,818	2,818	2,818
51	Other		-	-	-	-	-	-
52	**Planned Non-Volumetric Revenue**							
53	Residential (Rows 43 * 48)		$ -	$ -	$ -	$ -	$ -	$ -
54	Secondary (Rows 44 * 49)		$ -	$ -	$ -	$ -	$ -	$ -
55	Primary (Rows 45 * 50)		$ -	$ -	$ -	$ -	$ -	$ -
56	Other (Rows 46 * 51)		$ -	$ -	$ -	$ -	$ -	$ -
57	Total (Rows 53 + 54 + 55 + 56)		$ -	$ -	$ -	$ -	$ -	$ -
58	**Volumetric (kWh) Charge Forecast**							
59	Residential		$ -	$ -	$ -	$ -	$ -	$ -
60	Secondary		$ -	$ -	$ -	$ -	$ -	$ -
61	Primary		$ -	$ -	$ -	$ -	$ -	$ -
62	Other		$ -	$ -	$ -	$ -	$ -	$ -
63	**kWh**							
64	Residential		15,844,478	14,451,501	15,289,865	15,274,274	15,325,354	15,402,435
65	Secondary		10,013,981	9,765,601	9,901,101	9,856,329	9,812,956	9,788,528
66	Primary		14,829,510	14,701,283	14,492,454	14,432,043	14,249,341	14,047,925
67	Other		209,674	203,563	194,848	193,043	191,886	190,930
68	**Planned Volumetric Revenue**							
69	Residential (Rows 59 * 64)		$ -	$ -	$ -	$ -	$ -	$ -
70	Secondary (Rows 60 * 65)		$ -	$ -	$ -	$ -	$ -	$ -
71	Primary (Rows 61 * 66)		$ -	$ -	$ -	$ -	$ -	$ -
72	Other (Rows 62 * 67)		$ -	$ -	$ -	$ -	$ -	$ -
73	Total (Rows 69 + 70 + 71 + 72)		$ -	$ -	$ -	$ -	$ -	$ -
74	**Year-End Regulatory Liability Balance**							
75	Current Year Regulatory Liability Balance (Row 57 + 73 - 41)	Calculated	$ 10,617,175	$ (14,841,891)	$ 14,585,963	$ 132,917,889	$ 80,292,753	$ (73,455,381)
76	Forecasted Ending Balance	Calculated	$ 19,430,429	$ 4,926,334	$ 20,247,158	$ 153,878,644	$ 238,195,527	$ 172,823,512
77	Carrying Charges	ATT-3 KV line 7	$ 337,797	$ 734,860	$ 713,597	$ 4,024,129	$ 8,083,367	$ 8,552,838
78	Total Cumulative Reg Liability (Rows 76 + 77)	Calculated	$ 19,768,226	$ 5,661,195	$ 20,960,755	$ 157,902,773	$ 246,278,893	$ 181,376,351
79	**Cumulative Megawatts by Year**							
80	DTE Owned Wind	WP-7 KLB line 2	1,461	1,491	1,491	1,491	1,491	1,491
81	DTE Owned Solar	WP-7 KLB line 18	65	65	75	421	1,136	2,663

(1) The Company has modeled costs after 2030 using Company-owned assumptions. This does not represent a position by the Company on ownership post 2030.

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2024 Amended REP
Renewable Energy Plan Summary

Case No.: U-21662
Exhibit: A-2
Witness: K.L. Bilyeu
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Line No.	(a)	(b)	(i) 2028	(j) 2029	(k) 2030	(l) 2031	(m) 2032	(n) 2033
1	**Sales and Requirement Calculation**	**Source**						
2	**Method: Weather Normalized or 3 Year Average**							
3	If Selected Weather Normalized:							
4	Current Year Sales to Retail Customers	Exh A-29 Column (i)	39,869,525	39,910,589	40,013,252	40,203,583	40,511,120	40,702,673
5	Less Number of Megawatt Hours Sold from Michigan Nuclear Energy		-	-	-	-	-	-
6	Current Year Weather Normalization Factor	Exh A-29 Column (i)	1.00	1.00	1.00	1.00	1.00	1.00
7	Less VGP sales	WP-6	6,616,223	7,426,909	7,415,003	7,385,969	7,375,761	7,328,315
8	Less Outflow from DG Customers		83,171	100,829	121,202	143,020	164,705	185,876
9	Current Year Weather Normalized Sales		33,170,131	32,382,850	32,477,046	32,674,594	32,970,654	33,188,482
10	If Selected 3 Year Average:							
11	Current Year Retail Sales to Retail Customers							
12	Less Number of Megawatt Hours Sold from Michigan Nuclear Energy							
13	Less VGP sales							
14	Less outflow from DG customers							
15	3 Year Average of sales							
16	RPS Required Energy Credits (For 2024 through 2029 15%, 2030 through 2034 50% 2035 and beyond 60%)	Calculated	5,110,759	4,975,520	16,191,425	16,238,523	16,337,297	16,485,327
17	**Energy Credits**							
18	Energy Credit Beginning Balance	Row 26	5,402,282	9,978,064	17,058,641	15,769,987	16,726,366	18,801,613
19	Plus: Energy Credits Obtained Through Generation/BOT	Exh A-4 +WP-4 KLB (IRECs)	5,979,683	7,689,837	9,356,714	11,743,705	13,258,615	15,574,681
20	Plus: Energy Credits Obtained Through PPA	Exh A-4 +WP-4 KLB (IRECs)	3,451,320	4,117,483	4,736,487	4,639,271	4,337,065	3,947,786
21	Plus: Energy Credits Obtained Through REC Purchases	Exh A-4 line 7	255,538	248,776	809,571	811,926	816,865	824,266
22	Less: Energy Credits Sold		-	-	-	-	-	-
23	Available Energy Credits (Rows 18 + 19 + 20 + 21 - 22)	Calculated	15,088,824	22,034,160	31,961,412	32,964,889	35,138,910	39,148,347
24	Less: Compliance Requirement (Row 16)	Calculated	5,110,759	4,975,520	16,191,425	16,238,523	16,337,297	16,485,327
25	Less: Energy Credit Expired		-	-	-	-	-	-
26	Energy Credit Ending Balance (Rows 23 - 24 - 25)	Calculated	9,978,064	17,058,641	15,769,987	16,726,366	18,801,613	22,663,019
27	**Revenue Requirement**							
28	Cost of Renewable Energy Generation/BOT (1)	Exh A-23 line 24 - lines 15,16&22	$ 1,448,956,595	$ 1,597,052,348	$ 1,734,732,134	$ 1,898,403,003	$ 2,032,771,656	$ 2,217,667,944
29	Cost of Renewable Energy PPA	Exh A-23 line 15	$ 263,037,439	$ 313,260,874	$ 347,818,689	$ 337,249,823	$ 309,766,112	$ 285,812,244
30	Cost of Renewable Energy Credit Purchases	Exh A-23 line 16	$ 3,526,169	$ 3,945,094	$ 8,649,183	$ 9,594,196	$ 10,397,140	$ 11,148,229
31	Costs of Administration of Renewable Energy Plan	ATT-1 PDK line 2	$ 583,047	$ 597,623	$ 612,563	$ 627,878	$ 643,574	$ 659,664
32	Less: Revenue obtained from Renewable Energy Sales (non-retail)							
33	REP Total Revenue Requirement (Rows 28 + 29 + 30 + 31 - 32)	Calculated	$ 1,716,103,250	$ 1,914,855,938	$ 2,091,812,570	$ 2,245,874,900	$ 2,353,578,483	$ 2,515,288,080
34	**Cost Recovery**							
35	Forecasted Transfer Price per MWH	Exh A-21 line 152 / line 151	$ 80.27	$ 79.95	$ 79.52	$ 79.77	$ 80.56	$ 75.62
36	MWH of Renewable Energy	Exh A-21 line 151	8,102,637	10,126,401	12,155,258	14,129,085	15,229,916	16,887,462
37	Amount Recovered Through the PSCR	Exh A-21 line 14	$ 650,413,860	$ 809,571,107	$ 966,530,672	$ 1,127,045,325	$ 1,226,864,368	$ 1,277,043,370
38	Federal Tax Impacts (including PTC/ITC/TCJA Remeasurement) (1)	Exh A-22 line 10, 11, 12, and 23	$ 323,403,897	$ 434,652,712	$ 514,804,912	$ 570,624,075	$ 607,947,890	$ 693,191,624
39	Revenue from Voluntary Green Pricing Programs (2)	Exh A-22 line 14, 15 and 18	$ 377,899,125	$ 423,868,700	$ 423,051,837	$ 421,373,513	$ 420,759,610	$ 418,040,625
40	AFUDC Impacts	Exh A-22 line 36, 37, 38, 39, 40	$ 191,400,495	$ 158,845,076	$ 169,818,984	$ 148,755,172	$ 180,927,652	$ 191,276,765
41	Incremental Cost of Compliance (Rows 33 - 40)	Calculated	$ 172,985,874	$ 87,918,344	$ 17,606,164	$ (21,923,185)	$ (82,921,037)	$ (64,264,304)
42	**Non-Volumetric Meter/Customer Charge Forecast**							
43	Residential		$ -	$ -	$ -	$ -	$ -	$ -
44	Secondary		$ -	$ -	$ -	$ -	$ -	$ -
45	Primary		$ -	$ -	$ -	$ -	$ -	$ -
46	Other		$ -	$ -	$ -	$ -	$ -	$ -
47	**Meter/Customer Count**							
48	Residential	Exh A-26 Column (b)	2,098,709	2,104,525	2,110,138	2,115,485	2,120,393	2,125,749
49	Secondary	Exh A-26 Column (c)	213,071	213,660	214,227	214,767	215,263	215,804
50	Primary	Exh A-26 Column (d)	2,818	2,818	2,818	2,818	2,818	2,818
51	Other		-	-	-	-	-	-
52	**Planned Non-Volumetric Revenue**							
53	Residential (Rows 43 * 48)		$ -	$ -	$ -	$ -	$ -	$ -
54	Secondary (Rows 44 * 49)		$ -	$ -	$ -	$ -	$ -	$ -
55	Primary (Rows 45 * 50)		$ -	$ -	$ -	$ -	$ -	$ -
56	Other (Rows 46 * 51)		$ -	$ -	$ -	$ -	$ -	$ -
57	Total (Rows 53 + 54 + 55 + 56)		$ -	$ -	$ -	$ -	$ -	$ -
58	**Volumetric (kWh) Charge Forecast**							
59	Residential		$ -	$ -	$ -	$ -	$ -	$ -
60	Secondary		$ -	$ -	$ -	$ -	$ -	$ -
61	Primary		$ -	$ -	$ -	$ -	$ -	$ -
62	Other		$ -	$ -	$ -	$ -	$ -	$ -
63	**kWh**							
64	Residential		15,577,904	15,678,999	15,828,763	15,983,138	16,206,640	16,347,303
65	Secondary		9,805,191	9,787,112	9,787,087	9,805,146	9,870,886	9,900,050
66	Primary		14,211,310	14,149,762	14,080,221	14,074,610	14,069,603	14,068,305
67	Other		191,950	193,886	195,979	197,669	199,287	201,139
68	**Planned Volumetric Revenue**							
69	Residential (Rows 59 * 64)		$ -	$ -	$ -	$ -	$ -	$ -
70	Secondary (Rows 60 * 65)		$ -	$ -	$ -	$ -	$ -	$ -
71	Primary (Rows 61 * 66)		$ -	$ -	$ -	$ -	$ -	$ -
72	Other (Rows 62 * 67)		$ -	$ -	$ -	$ -	$ -	$ -
73	Total (Rows 69 + 70 + 71 + 72)		$ -	$ 75,500,000	$ 17,600,000	$ -	$ -	$ -
74	**Year-End Regulatory Liability Balance**							
75	Current Year Regulatory Liability Balance (Row 57 + 73 - 41)	Calculated	$ (172,985,874)	$ (12,418,344)	$ (6,164)	$ 21,923,185	$ 82,921,037	$ 64,264,304
76	Forecasted Ending Balance	Calculated	$ 8,390,477	$ (155,347)	$ 85,312	$ 22,011,833	$ 105,383,628	$ 172,256,767
77	Carrying Charges	ATT-3 KV line 7	$ 3,872,520	$ 246,823	$ 3,336	$ 450,758	$ 2,608,835	$ 5,719,100
78	Total Cumulative Reg Liability (Rows 76 + 77)	Calculated	$ 12,262,997	$ 91,476	$ 88,648	$ 22,462,591	$ 107,992,463	$ 177,975,867
79	**Cumulative Megawatts by Year**							
80	DTE Owned Wind	WP-7 KLB line 2	1,631	1,771	1,911	2,111	2,311	2,511
81	DTE Owned Solar	WP-7 KLB line 18	3,477	4,324	4,884	5,684	6,084	6,884

(1) The Company has modeled costs after 2030 using Company-owned assumptions. This does not represent a position by the Company on ownership post 2030.

Michigan Public Service Commission
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Line No.	(a)	(b)	(o) 2034	(p) 2035	(q) 2036	(r) 2037	(s) 2038	(t) 2039
1	**Sales and Requirement Calculation**	**Source**						
2	**Method: Weather Normalized or 3 Year Average**							
3	If Selected Weather Normalized:							
4	Current Year Sales to Retail Customers	Exh A-29 Column (i)	41,076,945	41,418,790	41,796,601	41,972,411	42,220,700	42,421,326
5	Less Number of Megawatt Hours Sold from Michigan Nuclear Energy		-	-	-	-	-	-
6	Current Year Weather Normalization Factor	Exh A-29 Column (i)	1.00	1.00	1.00	1.00	1.00	1.00
7	Less VGP sales	WP-6	7,299,690	7,271,202	7,261,222	7,214,626	7,186,536	7,158,575
8	Less Outflow from DG Customers		204,715	222,048	239,754	257,838	276,311	295,137
9	Current Year Weather Normalized Sales		33,572,540	33,925,541	34,295,625	34,499,947	34,757,853	34,967,614
10	If Selected 3 Year Average:							
11	Current Year Retail Sales to Retail Customers							
12	Less Number of Megawatt Hours Sold from Michigan Nuclear Energy							
13	Less VGP sales							
14	Less outflow from DG customers							
15	3 Year Average of sales							
16	RPS Required Energy Credits (For 2024 through 2029 15%, 2030 through 2034 50% 2035 and beyond 60%)	Calculated	16,594,241	20,143,524	20,355,325	20,577,375	20,699,968	20,854,712
17	**Energy Credits**							
18	Energy Credit Beginning Balance	Row 26	22,663,019	28,217,633	32,819,791	39,967,659	49,506,278	61,578,926
19	Plus: Energy Credits Obtained Through Generation/BOT	Exh A-4 +WP-4 KLB (IRECs)	17,938,444	20,437,898	23,189,448	25,812,563	28,475,980	31,113,974
20	Plus: Energy Credits Obtained Through PPA	Exh A-4 +WP-4 KLB (IRECs)	3,380,699	3,300,608	3,295,979	3,274,563	3,261,638	3,248,777
21	Plus: Energy Credits Obtained Through REC Purchases	Exh A-4 line 7	829,712	1,007,176	1,017,766	1,028,869	1,034,998	1,042,736
22	Less: Energy Credits Sold		-	-	-	-	-	-
23	Available Energy Credits (Rows 18 + 19 + 20 + 21 - 22)	Calculated	44,811,874	52,963,314	60,322,983	70,083,653	82,278,894	96,984,412
24	Less: Compliance Requirement (Row 16)	Calculated	16,594,241	20,143,524	20,355,325	20,577,375	20,699,968	20,854,712
25	Less: Energy Credit Expired		-	-	-	-	-	-
26	Energy Credit Ending Balance (Rows 23 - 24 - 25)	Calculated	28,217,633	32,819,791	39,967,659	49,506,278	61,578,926	76,129,701
27	**Revenue Requirement**							
28	Cost of Renewable Energy Generation/BOT (1)	Exh A-23 line 24 - lines 15,16&22	$ 2,401,470,536	$ 2,585,454,757	$ 2,762,948,226	$ 2,933,770,309	$ 3,105,791,011	$ 3,271,556,194
29	Cost of Renewable Energy PPA	Exh A-23 line 15	$ 257,645,330	$ 253,218,319	$ 253,038,679	$ 251,484,390	$ 250,630,992	$ 249,784,074
30	Cost of Renewable Energy Credit Purchases	Exh A-23 line 16	$ 11,758,663	$ 13,585,879	$ 14,633,360	$ 15,672,396	$ 16,692,154	$ 17,720,003
31	Costs of Administration of Renewable Energy Plan	ATT-1 PDK line 2	$ 676,155	$ 693,059	$ 710,386	$ 728,145	$ 746,349	$ 765,008
32	Less: Revenue obtained from Renewable Energy Sales (non-retail)							
33	REP Total Revenue Requirement (Rows 28 + 29 + 30 + 31 - 32)	Calculated	$ 2,671,550,684	$ 2,852,952,013	$ 3,031,330,651	$ 3,201,655,241	$ 3,373,860,505	$ 3,539,825,279
34	**Cost Recovery**							
35	Forecasted Transfer Price per MWH	Exh A-21 line 152 / line 151	$ 63.78	$ 61.75	$ 61.37	$ 61.18	$ 61.13	$ 61.18
36	MWH of Renewable Energy	Exh A-21 line 151	18,454,367	20,763,624	23,454,419	26,019,507	28,651,135	31,285,220
37	Amount Recovered Through the PSCR	Exh A-21 line 14	$ 1,177,033,921	$ 1,282,170,804	$ 1,439,457,766	$ 1,591,970,014	$ 1,751,531,729	$ 1,913,918,584
38	Federal Tax Impacts (including PTC/ITC/TCJA Remeasurement) (1)	Exh A-22 line 10, 11, 12, and 23	$ 757,698,532	$ 908,414,970	$ 1,013,190,817	$ 1,006,389,724	$ 1,015,795,801	$ 998,588,502
39	Revenue from Voluntary Green Pricing Programs (2)	Exh A-22 line 14, 15 and 18	$ 416,385,774	$ 414,738,683	$ 414,137,715	$ 411,467,574	$ 409,843,328	$ 408,226,440
40	AFUDC Impacts	Exh A-22 line 36, 37, 38, 39, 40	$ 199,980,347	$ 202,299,495	$ 202,737,654	$ 203,147,471	$ 203,323,309	$ 200,287,370
41	Incremental Cost of Compliance (Rows 33 - 40)	Calculated	$ 120,452,110	$ 45,328,061	$ (38,193,302)	$ (11,319,542)	$ (6,633,662)	$ 18,804,384
42	**Non-Volumetric Meter/Customer Charge Forecast**							
43	Residential		$ -	$ -	$ -	$ -	$ -	$ -
44	Secondary		$ -	$ -	$ -	$ -	$ -	$ -
45	Primary		$ -	$ -	$ -	$ -	$ -	$ -
46	Other		$ -	$ -	$ -	$ -	$ -	$ -
47	**Meter/Customer Count**							
48	Residential	Exh A-26 Column (b)	2,131,503	2,136,966	2,141,956	2,146,350	2,150,168	2,153,450
49	Secondary	Exh A-26 Column (c)	216,385	216,937	217,441	217,885	218,271	218,603
50	Primary	Exh A-26 Column (d)	2,818	2,818	2,818	2,818	2,818	2,818
51	Other		-	-	-	-	-	-
52	**Planned Non-Volumetric Revenue**							
53	Residential (Rows 43 * 48)		$ -	$ -	$ -	$ -	$ -	$ -
54	Secondary (Rows 44 * 49)		$ -	$ -	$ -	$ -	$ -	$ -
55	Primary (Rows 45 * 50)		$ -	$ -	$ -	$ -	$ -	$ -
56	Other (Rows 46 * 51)		$ -	$ -	$ -	$ -	$ -	$ -
57	Total (Rows 53 + 54 + 55 + 56)		$ -	$ -	$ -	$ -	$ -	$ -
58	**Volumetric (kWh) Charge Forecast**							
59	Residential		$ -	$ -	$ -	$ -	$ -	$ -
60	Secondary		$ -	$ -	$ -	$ -	$ -	$ -
61	Primary		$ -	$ -	$ -	$ -	$ -	$ -
62	Other		$ -	$ -	$ -	$ -	$ -	$ -
63	**kWh**							
64	Residential		16,569,088	16,781,822	16,992,647	17,069,709	17,151,482	17,200,921
65	Secondary		9,980,337	10,058,966	10,154,548	10,184,188	10,240,044	10,281,669
66	Primary		14,121,666	14,154,815	14,208,513	14,259,537	14,351,723	14,442,460
67	Other		201,139	201,139	201,139	201,139	201,139	201,139
68	**Planned Volumetric Revenue**							
69	Residential (Rows 59 * 64)		$ -	$ -	$ -	$ -	$ -	$ -
70	Secondary (Rows 60 * 65)		$ -	$ -	$ -	$ -	$ -	$ -
71	Primary (Rows 61 * 66)		$ -	$ -	$ -	$ -	$ -	$ -
72	Other (Rows 62 * 67)		$ -	$ -	$ -	$ -	$ -	$ -
73	Total (Rows 69 + 70 + 71 + 72)		$ -	$ -	$ -	$ -	$ -	$ -
74	**Year-End Regulatory Liability Balance**							
75	Current Year Regulatory Liability Balance (Row 57 + 73 - 41)	Calculated	$ (120,452,110)	$ (45,328,061)	$ 38,193,302	$ 11,319,542	$ 6,633,662	$ (18,804,384)
76	Forecasted Ending Balance	Calculated	$ 57,523,757	$ 17,001,539	$ 56,813,572	$ 69,672,308	$ 78,918,454	$ 63,199,579
77	Carrying Charges	ATT-3 KV line 7	$ 4,805,843	$ 1,618,731	$ 1,539,194	$ 2,612,485	$ 3,085,508	$ 2,963,065
78	Total Cumulative Reg Liability (Rows 76 + 77)	Calculated	$ 62,329,600	$ 18,620,270	$ 58,352,766	$ 72,284,792	$ 82,003,963	$ 66,162,644
79	**Cumulative Megawatts by Year**							
80	DTE Owned Wind	WP-7 KLB line 2	2,711	3,711	4,711	5,711	6,711	7,711
81	DTE Owned Solar	WP-7 KLB line 18	7,684	7,684	7,684	7,684	7,684	7,684

(1) The Company has modeled costs after 2030 using Company-owned assumptions. This does not represent a position by the Company on ownership post 2030.

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Line No.	(a)	(b)	(u) 2040	(v) 2041	(w) 2042	(x) 2043	(y) 2044	(z) 2045
1	**Sales and Requirement Calculation**	**Source**						
2	**Method: Weather Normalized or 3 Year Average**							
3	If Selected Weather Normalized:							
4	Current Year Sales to Retail Customers	Exh A-29 Column (i)	42,654,688	42,699,590	42,849,878	43,041,817	43,325,884	43,439,572
5	Less Number of Megawatt Hours Sold from Michigan Nuclear Energy		-	-	-	-	-	-
6	Current Year Weather Normalization Factor	Exh A-29 Column (i)	1.00	1.00	1.00	1.00	1.00	1.00
7	Less VGP sales	WP-6	7,148,812	7,103,051	7,075,484	7,048,047	7,038,504	6,993,562
8	Less Outflow from DG Customers		313,920	332,890	352,794	373,097	393,673	414,458
9	Current Year Weather Normalized Sales		35,191,955	35,263,649	35,421,600	35,620,672	35,893,707	36,031,552
10	If Selected 3 Year Average:							
11	Current Year Retail Sales to Retail Customers							
12	Less Number of Megawatt Hours Sold from Michigan Nuclear Energy							
13	Less VGP sales							
14	Less outflow from DG customers							
15	3 Year Average of sales							
16	RPS Required Energy Credits (For 2024 through 2029 15%, 2030 through 2034 50% 2035 and beyond 60%)	Calculated	20,980,568	21,115,173	21,158,189	21,252,960	21,372,403	21,536,224
17	**Energy Credits**							
18	Energy Credit Beginning Balance	Row 26	76,129,701	93,290,409	112,853,350	134,866,094	156,912,213	178,617,304
19	Plus: Energy Credits Obtained Through Generation/BOT	Exh A-4 +WP-4 KLB (IRECs)	33,847,982	36,399,106	38,902,443	39,038,455	38,815,294	38,478,159
20	Plus: Energy Credits Obtained Through PPA	Exh A-4 +WP-4 KLB (IRECs)	3,244,266	3,223,249	3,210,581	3,197,976	3,193,581	3,172,955
21	Plus: Energy Credits Obtained Through REC Purchases	Exh A-4 line 7	1,049,028	1,055,759	1,057,909	1,062,648	1,068,620	1,076,811
22	Less: Energy Credits Sold		-	-	-	-	-	-
23	Available Energy Credits (Rows 18 + 19 + 20 + 21 - 22)	Calculated	114,270,978	133,968,523	156,024,284	178,165,173	199,989,708	221,345,229
24	Less: Compliance Requirement (Row 16)	Calculated	20,980,568	21,115,173	21,158,189	21,252,960	21,372,403	21,536,224
25	Less: Energy Credit Expired		-	-	-	-	-	-
26	Energy Credit Ending Balance (Rows 23 - 24 - 25)	Calculated	93,290,409	112,853,350	134,866,094	156,912,213	178,617,304	199,809,005
27	**Revenue Requirement**							
28	Cost of Renewable Energy Generation/BOT (1)	Exh A-23 line 24 - lines 15,16&22	$ 3,423,749,122	$ 3,521,975,876	$ 3,540,334,535	$ 3,417,147,116	$ 3,309,193,417	$ 3,206,325,116
29	Cost of Renewable Energy PPA	Exh A-23 line 15	$ 249,628,629	$ 248,116,978	$ 247,295,218	$ 246,481,261	$ 246,349,608	$ 244,879,491
30	Cost of Renewable Energy Credit Purchases	Exh A-23 line 16	$ 18,746,126	$ 19,763,609	$ 20,763,689	$ 21,776,760	$ 22,801,405	$ 23,826,494
31	Costs of Administration of Renewable Energy Plan	ATT-1 PDK line 2	$ 784,133	$ 803,736	$ 823,830	$ 844,425	$ 865,536	$ 887,175
32	Less: Revenue obtained from Renewable Energy Sales (non-retail)							
33	REP Total Revenue Requirement (Rows 28 + 29 + 30 + 31 - 32)	Calculated	$ 3,692,908,010	$ 3,790,660,200	$ 3,809,217,271	$ 3,686,249,562	$ 3,579,209,966	$ 3,475,918,275
34	**Cost Recovery**							
35	Forecasted Transfer Price per MWH	Exh A-21 line 152 / line 151	$ 61.31	$ 61.51	$ 61.39	$ 61.36	$ 61.37	$ 61.38
36	MWH of Renewable Energy	Exh A-21 line 151	34,014,695	36,560,752	38,960,221	39,298,941	39,343,931	39,174,239
37	Amount Recovered Through the PSCR	Exh A-21 line 14	$ 2,085,371,198	$ 2,248,950,928	$ 2,391,730,634	$ 2,411,578,383	$ 2,414,593,381	$ 2,404,438,919
38	Federal Tax Impacts (including PTC/ITC/TCJA Remeasurement) (1)	Exh A-22 line 10, 11, 12, and 23	$ 1,129,599,998	$ 1,155,703,784	$ 1,209,596,337	$ 1,127,736,089	$ 1,097,504,410	$ 1,010,735,088
39	Revenue from Voluntary Green Pricing Programs (2)	Exh A-22 line 14, 15 and 18	$ 407,637,626	$ 405,015,502	$ 403,421,155	$ 401,834,309	$ 401,257,926	$ 398,682,844
40	AFUDC Impacts	Exh A-22 line 36, 37, 38, 39, 40	$ 185,083,587	$ 117,625,330	$ (6,276,112)	$ (31,960,215)	$ (32,071,533)	$ (32,071,533)
41	Incremental Cost of Compliance (Rows 33 - 40)	Calculated	$ (114,784,398)	$ (136,635,344)	$ (189,254,743)	$ (222,939,004)	$ (302,074,218)	$ (305,867,042)
42	**Non-Volumetric Meter/Customer Charge Forecast**							
43	Residential		$ -	$ -	$ -	$ -	$ -	$ -
44	Secondary		$ -	$ -	$ -	$ -	$ -	$ -
45	Primary		$ -	$ -	$ -	$ -	$ -	$ -
46	Other		$ -	$ -	$ -	$ -	$ -	$ -
47	**Meter/Customer Count**							
48	Residential	Exh A-26 Column (b)	2,156,186	2,158,382	2,160,663	2,163,523	2,166,450	2,169,196
49	Secondary	Exh A-26 Column (c)	218,879	219,101	219,331	219,620	219,916	220,193
50	Primary	Exh A-26 Column (d)	2,818	2,818	2,818	2,818	2,818	2,818
51	Other		-	-	-	-	-	-
52	**Planned Non-Volumetric Revenue**							
53	Residential (Rows 43 * 48)		$ -	$ -	$ -	$ -	$ -	$ -
54	Secondary (Rows 44 * 49)		$ -	$ -	$ -	$ -	$ -	$ -
55	Primary (Rows 45 * 50)		$ -	$ -	$ -	$ -	$ -	$ -
56	Other (Rows 46 * 51)		$ -	$ -	$ -	$ -	$ -	$ -
57	Total (Rows 53 + 54 + 55 + 56)		$ -	$ -	$ -	$ -	$ -	$ -
58	**Volumetric (kWh) Charge Forecast**							
59	Residential		$ -	$ -	$ -	$ -	$ -	$ -
60	Secondary		$ -	$ -	$ -	$ -	$ -	$ -
61	Primary		$ -	$ -	$ -	$ -	$ -	$ -
62	Other		$ -	$ -	$ -	$ -	$ -	$ -
63	**kWh**							
64	Residential		17,260,074	17,204,770	17,201,177	17,229,496	17,310,539	17,293,905
65	Secondary		10,336,036	10,334,366	10,368,735	10,420,110	10,503,575	10,537,486
66	Primary		14,543,518	14,626,425	14,726,033	14,817,974	14,916,958	14,992,583
67	Other		201,139	201,139	201,139	201,139	201,139	201,139
68	**Planned Volumetric Revenue**							
69	Residential (Rows 59 * 64)		$ -	$ -	$ -	$ -	$ -	$ -
70	Secondary (Rows 60 * 65)		$ -	$ -	$ -	$ -	$ -	$ -
71	Primary (Rows 61 * 66)		$ -	$ -	$ -	$ -	$ -	$ -
72	Other (Rows 62 * 67)		$ -	$ -	$ -	$ -	$ -	$ -
73	Total (Rows 69 + 70 + 71 + 72)		$ -	$ -	$ -	$ -	$ -	$ -
74	**Year-End Regulatory Liability Balance**							
75	Current Year Regulatory Liability Balance (Row 57 + 73 - 41)	Calculated	$ 114,784,398	$ 136,635,344	$ 189,254,743	$ 222,939,004	$ 302,074,218	$ 305,867,042
76	Forecasted Ending Balance	Calculated	$ 180,947,043	$ 322,625,169	$ 522,259,537	$ 762,652,642	$ 1,091,305,491	$ 1,435,550,561
77	Carrying Charges	ATT-3 KV line 7	$ 5,042,783	$ 10,379,625	$ 17,454,101	$ 26,578,631	$ 38,378,028	$ 52,351,441
78	Total Cumulative Reg Liability (Rows 76 + 77)	Calculated	$ 185,989,825	$ 333,004,794	$ 539,713,639	$ 789,231,273	$ 1,129,683,519	$ 1,487,902,002
79	**Cumulative Megawatts by Year**							
80	DTE Owned Wind	WP-7 KLB line 2	8,711	9,711	10,211	10,211	10,211	10,211
81	DTE Owned Solar	WP-7 KLB line 18	7,684	7,684	8,184	8,184	8,184	8,184

(1) The Company has modeled costs after 2030 using Company-owned assumptions. This does not represent a position by the Company on ownership post 2030.

Michigan Public Service Commission
DTE Electric Company
Renewable Portfolio Standard Compliance Summary

Case No.: U-21990
Exhibit: A-3
Witness: K.L. Bilyeu
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Line No.	(a)	(b)	(c) 2026	(d) 2027	(e) 2028	(f) 2029	(g) 2030	(h) 2031	(i) 2032	(j) 2033	(k) 2034	(l) 2035
1	**Sales and Requirement Calculation**	**Source (U-21662)**										
2	**Method: Weather Normalized or 3 Year Average**											
3	If Selected Weather Normalized:											
4	Current Year Sales to Retail Customers	Exh A-29 Column (i)	39,634,892	39,497,918	39,869,525	39,910,589	40,013,252	40,203,583	40,511,120	40,702,673	41,076,945	41,418,790
	Incremental Data Center Load		3,285	5,031,963	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572
5	Less Number of Megawatt Hours Sold from Michigan Nuclear Energy		-	-	-	-	-	-	-	-	-	-
6	Current Year Weather Normalization Factor	Exh A-29 Column (i)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
7	Less VGP sales	WP-6	2,794,617	5,358,090	6,616,223	7,426,909	7,415,003	7,385,969	7,375,761	7,328,315	7,299,690	7,271,202
8	Less Outflow from DG Customers		55,355	68,099	83,171	100,829	121,202	143,020	164,705	185,876	204,715	222,048
9	Current Year Weather Normalized Sales		36,788,205	39,103,692	44,073,703	43,286,422	43,380,618	43,578,166	43,874,226	44,092,054	44,476,112	44,829,113
10	If Selected 3 Year Average:											
11	Current Year Retail Sales to Retail Customers											
12	Less Number of Megawatt Hours Sold from Michigan Nuclear Energy											
13	Less VGP sales											
14	Less outflow from DG customers											
15	3 Year Average of sales											
16	RPS Required Energy Credits (For 2026 through 2029 15%, 2030 through 2034 50% 2035 and beyond 60%)	Calculated	5,667,532	5,518,231	5,865,554	6,611,055	21,643,211	21,690,309	21,789,083	21,937,113	22,046,027	26,685,667
17	**Energy Credits**											
18	Energy Credit Beginning Balance	Row 26	2,455,332	2,833,451	5,401,790	9,222,777	14,667,818	7,927,378	3,431,971	55,432	(1,534,948)	(1,432,120)
19	Plus: Energy Credits Obtained Through Generation/BOT	Exh A-4 +WP-4 KLB (IRECs)	3,405,313	4,785,213	5,979,683	7,689,837	9,356,714	11,743,705	13,258,615	15,574,681	17,938,444	20,437,898
20	Plus: Energy Credits Obtained Through PPA	Exh A-4 +WP-4 KLB (IRECs)	2,356,962	3,025,469	3,451,320	4,117,483	4,736,487	4,639,271	4,337,065	3,947,786	3,380,699	3,300,608
21	Plus: Energy Credits Obtained Through REC Purchases	Exh A-4 line 7	283,377	275,887	255,538	248,776	809,571	811,926	816,865	824,266	829,712	1,007,176
22	Less: Energy Credits Sold		-	-	-	-	-	-	-	-	-	-
23	Available Energy Credits (Rows 18 + 19 + 20 + 21 - 22)	Calculated	8,500,983	10,920,020	15,088,331	21,278,873	29,570,589	25,122,280	21,844,515	20,402,166	20,613,907	23,313,561
24	Less: Compliance Requirement (Row 16)	Calculated	5,667,532	5,518,231	5,865,554	6,611,055	21,643,211	21,690,309	21,789,083	21,937,113	22,046,027	26,685,667
25	Less: Energy Credit Expired		-	-	-	-	-	-	-	-	-	-
26	Energy Credit Ending Balance (Rows 23 - 24 - 25)	Calculated	2,833,451	5,401,790	9,222,777	14,667,818	7,927,378	3,431,971	55,432	(1,534,948)	(1,432,120)	(3,372,106)
27	**Base Case without Data Center Load**											
28	RPS Required Energy Credits (For 2026 through 2029 15%, 2030 through 2034 50% 2035 and beyond 60%)	Exh A-2 line 16	5,667,532	5,517,738	5,110,759	4,975,520	16,191,425	16,238,523	16,337,297	16,485,327	16,594,241	20,143,524

Michigan Public Service Commission
DTE Electric Company
Renewable Portfolio Standard Compliance Summary

Case No.: U-21990
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Witness: K.L. Bilyeu
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Line No.	(a)	(b)	(m) 2036	(n) 2037	(o) 2038	(p) 2039	(q) 2040	(r) 2041	(s) 2042	(t) 2043	(u) 2044	(v) 2045
1	**Sales and Requirement Calculation**	**Source (U-21662)**										
2	**Method: Weather Normalized or 3 Year Average**											
3	If Selected Weather Normalized:											
4	Current Year Sales to Retail Customers	Exh A-29 Column (i)	41,796,601	41,972,411	42,220,700	42,421,326	42,654,688	42,699,590	42,849,878	43,041,817	43,325,884	43,439,572
	Incremental Data Center Load		10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572	10,903,572
5	Less Number of Megawatt Hours Sold from Michigan Nuclear Energy		-	-	-	-	-	-	-	-	-	-
6	Current Year Weather Normalization Factor	Exh A-29 Column (i)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
7	Less VGP sales	WP-6	7,261,222	7,214,626	7,186,536	7,158,575	7,148,812	7,103,051	7,075,484	7,048,047	7,038,504	6,993,562
8	Less Outflow from DG Customers		239,754	257,838	276,311	295,137	313,920	332,890	352,794	373,097	393,673	414,458
9	Current Year Weather Normalized Sales		45,199,197	45,403,519	45,661,425	45,871,186	46,095,527	46,167,221	46,325,172	46,524,244	46,797,279	46,935,124
10	If Selected 3 Year Average:											
11	Current Year Retail Sales to Retail Customers											
12	Less Number of Megawatt Hours Sold from Michigan Nuclear Energy											
13	Less VGP sales											
14	Less outflow from DG customers											
15	3 Year Average of sales											
16	RPS Required Energy Credits (For 2026 through 2029 15%, 2030 through 2034 50% 2035 and beyond 60%)	Calculated	26,897,468	27,119,518	27,242,111	27,396,855	27,522,711	27,657,316	27,700,333	27,795,103	27,914,546	28,078,367
17	**Energy Credits**											
18	Energy Credit Beginning Balance	Row 26	(3,372,106)	(3,784,147)	(1,816,539)	2,678,967	9,644,863	19,214,400	31,179,439	45,592,130	60,033,458	74,127,786
19	Plus: Energy Credits Obtained Through Generation/BOT	Exh A-4 +WP-4 KLB (IRECs)	23,189,448	25,812,563	28,475,980	31,113,974	33,847,982	36,399,106	38,902,443	39,038,455	38,815,294	38,478,159
20	Plus: Energy Credits Obtained Through PPA	Exh A-4 +WP-4 KLB (IRECs)	3,295,979	3,274,563	3,261,638	3,248,777	3,244,266	3,223,249	3,210,581	3,197,976	3,193,581	3,172,955
21	Plus: Energy Credits Obtained Through REC Purchases	Exh A-4 line 7	-	-	-	-	-	-	-	-	-	-
22	Less: Energy Credits Sold		-	-	-	-	-	-	-	-	-	-
23	Available Energy Credits (Rows 18 + 19 + 20 + 21 - 22)	Calculated	23,113,321	25,302,979	29,921,078	37,041,718	46,737,111	58,836,755	73,292,463	87,828,561	102,042,332	115,778,899
24	Less: Compliance Requirement (Row 16)	Calculated	26,897,468	27,119,518	27,242,111	27,396,855	27,522,711	27,657,316	27,700,333	27,795,103	27,914,546	28,078,367
25	Less: Energy Credit Expired		-	-	-	-	-	-	-	-	-	-
26	Energy Credit Ending Balance (Rows 23 - 24 - 25)	Calculated	(3,784,147)	(1,816,539)	2,678,967	9,644,863	19,214,400	31,179,439	45,592,130	60,033,458	74,127,786	87,700,532
27	**Base Case without Data Center Load**											
28	RPS Required Energy Credits (For 2026 through 2029 15%, 2030 through 2034 50% 2035 and beyond 60%)	Exh A-2 line 16	20,355,325	20,577,375	20,699,968	20,854,712	20,980,568	21,115,173	21,158,189	21,252,960	21,372,403	21,536,224

EXHIBIT MEC-31

RESERVED

EXHIBIT MEC-32

RESERVED

EXHIBIT MEC-33

RESERVED

EXHIBIT MEC-34

RESERVED

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-1.5b

Respondent: S. Burgdorf

Page: 1 of 1

Question: 5. Please refer to the CCAA (Exhibit A-18) introduced through the Direct Testimony of Neal Foley at p. 5. b. Has DTE already planned to deploy any of the 480 MW of energy storage projects and 1,600 MW of renewable energy projects prior to the Special Contracts?

Answer: No. These resources were not planned to be deployed or procured prior to the Special Contracts.

Attachment: *None*

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-1.19

Respondent: S. Burgdorf

Page: 1 of 1

Question: 19. Please refer to the Direct Testimony of Shawn D. Burgdorf, p. 22 lines 19-20 and explain how the Customer intends to shed 250 MW of load on demand (i.e. through backup generation, load shifting to other data centers, etc.).

Answer: DTE Electric objects for the reasons that the request calls for speculation to the extent that it asks the Company to speak on behalf of the Customer—specifically, to describe "how the Customer intends to shed 250 MW of load on demand". DTE Electric does not control the Customer's internal operational planning or compliance decisions, and is not in a position to characterize, represent, or speculate about the Customer's future plans, strategies, or actions. Subject to and without waiving the foregoing objections, the Company would answer as follows:

It is the Customer's responsibility to determine how it will meet its demand response obligations.

Attachment: *None.*

MPSC Case No: U-22058

Requester: CEOMEIBCIEI

Question No.: CEOMEIBCIEIDE-1.8a

Respondent: S. Burgdorf

Page: 1 of 1

Question: 8. Refer to the direct testimony of Neal Foley at page 31 lines 23–25, which states: "The ZRCs will be provided by the Customer for each MISO season from June 1, 2028 to May 31, 2033." Separately, when discussing the ZRCs and the other resources in the resource plan for the data center, Witness Burgdorf states at page 10, lines 5–9, that "...the DTE Electric system is resource adequate in 2029 with these resources. In 2033, however, additional 'perfect capacity' is needed to ensure resource adequacy so a proxy generic combined cycle gas turbine ('CCGT') and carbon capture and sequestration ('CCS') was modeled to address this need." a. Please provide details describing all other resources beyond CCGT and CCS that could be procured to provide perfect capacity.

Answer: For modeling in this case, a proxy CCGT with CCS was utilized in the context of meeting resource adequacy requirements solely for purposes of performing the customer benefit analysis. As stated in Q22 of Witness Burgdorf's direct testimony, the specific resource(s) will be determined in the upcoming IRP.

As stated in Witness Brooks direct testimony perfect capacity is a tool for comparison and communication, and a combination of resource types could be used to fill the identified gap. There are no generation resources that would ever be considered "perfect capacity". Depending on the resource type, more or less nameplate generation would be needed to address the perfect capacity need identified.

Attachment: *None.*

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-2.7a

Respondent: S. Burgdorf

Page: 1 of 1

Question: 7. Please refer to the Company's Response to discovery request CEOMEIBCIEIDE-1.8a: a. Explain what "combination of resource types could be used to fill the identified gap" other than CCGT with CCS.

Answer: As noted in CEOMEIBCIEIDE-1.8a the resource(s) will be determined in the upcoming IRP.

Attachment: *None*

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-2.7b

Respondent: S. Burgdorf

Page: 1 of 1

Question: 7. Please refer to the Company's Response to discovery request CEOMEIBCIEIDE-1.8a: b. Confirm whether renewable energy and long-term storage can "be used to fill the identified gap" in perfect capacity. If not confirmed, explain why.

Answer: Not confirmed. As stated in Q22 of Witness Burgdorf's direct testimony, the resource(s) will be determined in the upcoming IRP.

Attachment: *None.*

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-2.7c

Respondent: S. Burgdorf

Page: 1 of 1

Question: 7. Please refer to the Company's Response to discovery request CEOMEIBCIEIDE-1.8a: c. Please refer also to the Direct Testimony of Shawn D. Burgdorf, p. 12 line 5 and explain in detail whether the "identified gap" could be filled, partially or fully, with the 250 MW of renewable energy and 500 MW of battery storage planned under the "Base Case" for 2033 to 2036 and removed in the "Customer Datacenter Case."

Answer: No analysis of alternative resources was performed to fill the "identified gap". As discussed in response to CEOMEIBCIEI-1.8, the identified capacity need was addressed using a proxy resource for modeling purposes associated with the customer benefit analysis in this proceeding.

The renewable energy and battery storage resources referenced in the Base Case were part of system-level planning assumptions and were not analyzed as a substitute for the proxy resource used to meet the identified capacity need in the Customer Datacenter Case.

Attachment: *None.*

MPSC Case No: U-22058

Requester: CEOMEIBCIEI

Question No.: CEOMEIBCIEIDE-1.22

Respondent: S. Burgdorf

Page: 1 of 1

Question: 22. Refer to the direct testimony of Shawn Burgdorf at pages 13–14, and the discussion of the proxy CCGT with CCS. Please explain if the Company is modeling this resource as a Customer specific resource with the Customer paying the associated revenue requirements for the resource.

Answer: The Company clarifies that neither the resources addressed in the CCAA (i.e., energy storage projects, renewable energy projects, and ZRC transfer) nor the proxy CCGT with CCS are dedicated to serve the load of any single customer and therefore are not “customer specific” based on how they will be utilized.

In addition, as noted in Q13, the Company’s future generation resources needed to serve the Company’s load will be determined through the Company’s IRP to be filed later this year.

The CCAA does not obligate the Customer to pay for any resources except those that are specifically identified in that contract. As such, the Company’s modeling assumes the CCGT with CCS is recovered through base rates.

Attachment: *None.*

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-2.5b

Respondent: S. Burgdorf

Page: 1 of 1

Question: 5. Please refer to the Direct Testimony of Shawn D. Burgdorf, p. 11 lines 3-7:
b. Confirm that the proxy CCGT is modeled only to support the addition of the Customer's load. If not confirmed, explain why DTE would otherwise build the proxy CCGT.

Answer: Not confirmed. Refer to CEOMEIBCIEIDE-1.22. The Company does not designate specific individual resources as being used exclusively to serve the Customer's load or any individual customer's load. Instead, in its Integrated Resource Plan (IRP) modeling, the Company will evaluate the incremental impact of the Customer's load on system resource needs by comparing portfolios with and without that load and identifying the additional capacity or energy resources required to reliably serve total system demand.

Attachment: *None*

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-2.6a

Respondent: S. Burgdorf

Page: 1 of 1

Question: 6. Please refer to the Direct Testimony of Shawn D. Burgdorf, p. 14 lines 8-13: a. Confirm that, after the conclusion of the PSA with the Customer, assuming that the PSA is not renewed and the CCGT comes online as modeled in 2033, 26% of the cost of the CCGT will be remaining. If not confirmed, explain what the remaining cost of the CCGT will be.

Answer: Under the modeled example of a proxy CCGT coming online in 2033, the remaining revenue requirement on a NPV basis associated with that proxy resource is approximately 26 percent after the conclusion of the PSA. This value reflects the specific assumptions used in the Company's modeling analysis and does not represent a determination regarding any actual resource that may be developed or the recovery of its costs.

Attachment: *None.*

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-2.6b

Respondent: S. Burgdorf

Page: 1 of 1

Question: 6. Please refer to the Direct Testimony of Shawn D. Burgdorf, p. 14 lines 8-13: b. Confirm that, after the conclusion of the PSA with the Customer, assuming that the PSA is not renewed and the CCGT comes online as modeled in 2033, the remaining cost of the CCGT will be recovered from other ratepayers. If not confirmed, explain how the remaining cost of the CCGT will be recovered.

Answer: Not confirmed. The proxy CCGT was used for modeling in this special contract proceeding, and the Company has not made a determination regarding the development of any specific resource or the future ratemaking treatment of its costs. To the extent a resource is developed and has remaining costs following conclusion of the PSA, the recovery of such costs —net of any associated market revenues—would be determined in an applicable future proceeding.

Attachment: *None.*

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-2.15c

Respondent: S. Burgdorf

Page: 1 of 1

Question: 15. Please refer to the Company's Response to MNSDE-1.2c, the Direct Testimony of Aaron Willis at p. 7 lines 10-21, and Exhibit A-19. With regards to the "The revenue requirement of other resources identified in the IRP as being caused by the Customer's load" referenced in MNSDE-1.2c: c. State whether the revenue requirements of any new resources besides the proxy CCGT w/CCS and any renewables not covered by the CCAA are factored into the estimated $1.7 billion benefit set forth in Ex. A-19 and the referenced testimony of Witness Willis. If so, identify the revenue requirement for each such new resource, and explain how it was factored into the estimated $1.7 billion benefit. If not, explain why not.

Answer: There were no other incremental resources included in the calculation outside of the CCAA and the proxy CCGT w/CCS.

Attachment: *None.*

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-3.7

Respondent: S. Burgdorf

Page: 1 of 1

Question: 7. Please refer to the Company's response to CEOMEIBCIEIDE 1.20b and 1.21. Please provide a detailed explanation of the Company's rationale for selecting a gas CCGT with CCS as a "proxy" resource to meet total system reliability requirements in the Company's customer benefit analysis. Please include any associated documentation and/or workpapers in machine-readable Excel format with formulae intact.

Answer: The proxy CCGT with CCS was selected to satisfy the system capacity need identified in Q16 of Witness Burgdorf's direct testimony, based on the resource adequacy need identified by Witness Brooks. The use of CCGT with CCS reflects a reasonable and representative resource to satisfy the identified perfect capacity need in the modeling framework. This proxy resource was used solely for modeling purposes, and actual resource selection, design, and associated costs will be determined in the Company's IRP process.

Model outputs and workpapers regarding the Company's modeling for this case have been provided in response to prior discovery requests, including materials referenced in CEOMEIBCIEIDE-1.12 and CEOMEIBCIEIDE-1.26.

Attachment: *None.*

MPSC Case No: U-22058

Requester: AG

Question No.: AGDE-2.52b

Respondent: S. Burgdorf

Page: 1 of 1

Question: 52. Refer to lines 17-23 on page 9 and lines 1-13 on page 10 of Mr. Burgdorf's direct testimony on the Customer data center resource plan. b. Is the 727 MW of CCGT simply a placeholder or a likely generation resource. Explain your answer fully.

Answer: See Witness Burgdorf's direct testimony Q13, which explains that future generation resources will be determined in the Company's IRP. The 727 MW of CCGT is a proxy used for resource adequacy analysis and is not an identified or proposed specific generation project. Thus, the 727 MW of CCGT is a placeholder representing potential future "perfect capacity" (as defined by Witness Brooks) needs identified through modeling, rather than a determination that the Company will construct or acquire a specific CCGT resource.

Attachment: *None.*

Co-respondent: J. Brooks

MPSC Case No: U-22058

Requester: AG

Question No.: AGDE-2.52c

Respondent: S. Burgdorf

Page: 1 of 1

Question: 52. Refer to lines 17-23 on page 9 and lines 1-13 on page 10 of Mr. Burgdorf's direct testimony on the Customer data center resource plan. c. Explain how and where the Company would capture, sequester, and store CO2. Provide also the upfront cost and annual expense from inception to end of the program.

Answer: DTE Electric objects for the reasons that the request seeks information that is not relevant to the issues presented in this special contract proceeding, is not proportional to the needs of the case, and is not reasonably calculated to lead to the discovery of admissible evidence. DTE Electric further objects to this request to the extent it assumes the existence of a specific generation resource—namely, a CCGT with CCS—and seeks information for a proxy resource that has not been selected or proposed. The request seeks to expand the scope of this proceeding to include issues reserved for IRPs, but this proceeding only concerns approval of the special contracts governing electric service to a specific large load customer. The Application does not seek approval of, nor does it propose, any CCS facility, CCS project, or CCS investment. Thus, the requested information has no bearing on the Company's relief requested or determinations made in this proceeding. Subject to and without waiving the foregoing objections, the Company responds as follows:

See response to discovery question AGDE-2.52b. To the extent that references to CCS arise in this special contract matter, such limited references relate to a proxy CCGT with CCS utilized in the context of analyzing resource adequacy requirements solely for purposes of performing the customer benefit analysis. This generic proxy CCS used for modeling is not evidence of a proposed CCS project in this proceeding. The proxy resource was expressly identified as notional and illustrative. Any future resource decisions will be evaluated and determined as part of the upcoming IRP; thus, the requested information does not exist.

Attachment: *None.*

MPSC Case No: U-22058

Requester: AG

Question No.: AGDE-2.55a

Respondent: S. Burgdorf

Page: 1 of 1

Question: 55. Refer to lines 15-23 on page 14 of Mr. Burgdorf's direct testimony on the modeled value of the CCGT energy and capacity. a. Explain why and how the modeled market value of the energy and capacity will exceed the cost of capacity and energy generation.

Answer: DTE Electric objects for the reasons that the request is based on an incorrect premise that Witness Burgdorf's testimony asserts that the modeled market value of energy and capacity from the proxy CCGT with CCS, by itself, exceeds the full cost of that resource. Subject to and without waiving the foregoing objections, the Company responds as follows:

Witness Burgdorf's direct testimony lines 15-23, page 14 does not assert that the modeled market value of energy and capacity alone exceeds the full revenue requirement of the proxy CCGT with CCS. Rather, the revenues from the energy and capacity markets offset a portion of the remaining revenue requirement after 2047.

As further discussed in Q25 and Q26 of Witness Burgdorf's direct testimony, the overall value attributable to the proxy CCGT with CCS includes multiple components in addition to energy and capacity market revenues. These include, for example, the modeled value of the resource in displacing alternative capacity resources, as well as system level benefits associated with other resources in the Customer portfolio, including renewable energy assets. When these value streams are considered in combination, the total modeled value exceeds the remaining revenue requirement of the proxy resource in the years beyond 2047, as described in Q26.

Attachment: *None.*

MPSC Case No: U-22058

Requester: AG

Question No.: AGDE-2.60b

Respondent: Legal

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Question: 60. Refer to page 22 of Mr. Burgdorf's direct testimony on the Customer committing to a reduction of 250 MW or 25% of its peak demand for Demand Response. b. Identify what plans or justification the Customer provided to DTEE to justify 250 MW of Demand Response reduction.

Answer: DTE Electric objects for the reason that information related to discussions and/or negotiations between the Company and the Customer are outside the scope of the case, not proportional to the needs of the case, and not likely to lead to the discovery of admissible evidence. The Company further objects because the request seeks information regarding the Customer's internal planning, operational strategies, or supporting justification for its demand response commitment.

Attachment: *None.*

MPSC Case No: U-22058

Requester: AG

Question No.: AGDE-2.60d

Respondent: S. Burgdorf

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Question: 60. Refer to page 22 of Mr. Burgdorf's direct testimony on the Customer committing to a reduction of 250 MW or 25% of its peak demand for Demand Response. d. Confirm that other customers would ultimately pay the DR payments made to the Customer. If not confirming, provide evidence otherwise.

Answer: The DR payments will come from PSCR customers. However, the MISO capacity revenues which are expected to average higher than the payments will go to PSCR customers, thus providing a net benefit.

Attachment: *None.*

MPSC Case No: U-22058

Requester: AG

Question No.: AGDE-2.61

Respondent: S. Burgdorf

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Question: 61. Refer to lines 15-24 on page 23 of Mr. Burgdorf's direct testimony on the Customer would be assessed penalties for not meeting its commitment to a DR reduction request of 250 MW. Based on recently penalties and damages assessed by MISO or by the Company, provide the amount of penalties and damages, separately, that could be assessed to the Customer if the entire DR capacity of 250 MW is not reduced and provide the calculations in Excel.

Answer: Penalties are unique to each situation based on numerous factors and can vary to a great extent, therefore the Company can't speculate on hypothetical penalties nor compare penalties of existing demand response resources to the Customer's future demand response resource.

Attachment: *None.*

MPSC Case No: U-22058

Requester: CEOMEIBCIEI

Question No.: CEOMEIBCIEIDE-1.21b

Respondent: Legal

Page: 1 of 1

Question: 21. Refer to the direct testimony of Shawn Burgdorf at page 12, lines 10–14.
b. Please explain if DTE has conducted feasibility studies for Carbon Capture and Sequestration.

Answer: DTE Electric objects for the reasons that the request seeks information that is not relevant to the issues presented in this special contract proceeding, is not proportional to the needs of the case, and is not reasonably calculated to lead to the discovery of admissible evidence. The request seeks to expand the scope of this proceeding to include issues reserved for IRPs, but this proceeding only concerns approval of the PSA and CCAA governing electric service to a specific large load customer. The Application does not seek approval of, nor does it propose, any CCS facility, CCS project, or CCS investment. Thus, Accordingly, whether DTE Electric has conducted feasibility studies for CCS, generally or in other contexts, has no bearing on the Company's relief requested or determinations made in this proceeding.

To the extent that references to CCS arise in this special contract matter, such limited references relate to a proxy CCGT with CCS utilized in the context of analyzing resource adequacy requirements solely for purposes of performing the customer benefit analysis. This generic modeling construct is not evidence of a proposed CCS project in this proceeding. The proxy resource was expressly identified as notional and illustrative, and no feasibility determination was required or relied upon for purposes of the customer benefit analysis.

Attachment: *None*

MPSC Case No: U-22058

Requester: CEOMEIBCIEI

Question No.: CEOMEIBCIEIDE-1.21bi

Respondent: Legal

Page: 1 of 1

Question: 21. Refer to the direct testimony of Shawn Burgdorf at page 12, lines 10–14. b. Please explain if DTE has conducted feasibility studies for Carbon Capture and Sequestration. i. If yes, please provide those studies.

Answer: DTE Electric objects for the reasons that the request seeks information that is not relevant to the issues presented in this special contract proceeding, is not proportional to the needs of the case, and is not reasonably calculated to lead to the discovery of admissible evidence. The request seeks to expand the scope of this proceeding to include issues reserved for IRPs, but this proceeding only concerns approval of the PSA and CCAA governing electric service to a specific large load customer. The Application does not seek approval of, nor does it propose, any CCS facility, CCS project, or CCS investment. Thus, Accordingly, whether DTE Electric has conducted feasibility studies for CCS, generally or in other contexts, has no bearing on the Company's relief requested or determinations made in this proceeding.

To the extent that references to CCS arise in this special contract matter, such limited references relate to a proxy CCGT with CCS utilized in the context of analyzing resource adequacy requirements solely for purposes of performing the customer benefit analysis. This generic modeling construct is not evidence of a proposed CCS project in this proceeding. The proxy resource was expressly identified as notional and illustrative, and no feasibility determination was required or relied upon for purposes of the customer benefit analysis.

Attachment: *None*

MPSC Case No: U-22058

Requester: MNS

Question No.: MNSDE-2.19

Respondent: S. Benyard

Page: 1 of 1

Question: 19. Please refer to the Company's Response to MNSDE-1.10d. Confirm that construction has not started on the referenced ITC project described in the MISO Expedited Review Request Cannoli identified on page 5 of Witness Beynard's Direct Testimony. If not confirmed, identify when such construction began.

Answer: Confirmed. Construction has not started on the referenced ITC project.

Attachment: *None*

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of **DTE ELECTRIC COMPANY** for approval of special contracts and for other relief.	Case No. U-22058

Proof of Service

On the date below, an electronic copy of **Official Exhibit List and Exhibits of Michigan Environmental Council, Natural Resources Defense Council, and Sierra Club** was served on the following:

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The statements above are true to the best of my knowledge, information and belief.

Troposphere Legal
Counsel for MNS

Date: July 1, 2026 By: Natasha J. Fowles Digitally signed by Natasha Fowles Date: 2026.07.01 14:22:06 -04'00'

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