

John Richter

EDUCATION	Murdoch University, Perth, Australia – January 2009 M.S. in Renewable Energy Oakland Community College, Rochester Hills, Michigan – 1991 Alternative Energy Technologies (Solar, Wind, Biomass) Oakland University, Rochester, Michigan B.S. Engineering, minor in Economics - 1982
RENEWABLE ENERGY EXPERIENCE	Adjunct Instructor, Macomb Community College (2009 – 2010) Online / classroom hybrid course including labs. Grant-funded curriculum development and classroom instruction in solar energy. President, Great Lakes Renewable Energy Association (2002 – 2003) Non-profit administration focused on financial planning, fundraising & recruitment. Staffing, budget, and strategic planning. Policy Analyst, Great Lakes Renewable Energy Association Developed position papers on policy initiatives. One of three invited presenters to the Northeast and Midwest Caucus meeting on a national RPS. Presented: <i>Wind Power and Distributed Generation</i> to U.S. Congressional Staffers at the U.S. Capitol Building. Member of the MPSC collaborative on renewable energy and the Michigan Wind Working Group of the DOE's <i>Wind Powering America</i> program. Renewable Energy Consultant American Green Careers Project management and meeting facilitation for a team of independent contractors for the start-up of a proprietary school green jobs training program. Great Lakes Renewable Energy Association Researched, developed, and presented policy recommendations: <i>Opportunities for Renewable Energy Deployment</i> to Michigan legislators and staff. Midwest Education Connection Network (MECNet) / Urban Options Developed K-12 educational materials: <i>Michigan's Renewable Energy and Efficiency Success Stories</i>. This complemented materials from NEED. American Council for an Energy Efficient Economy (ACEEE) Researched and authored <i>Michigan's Current Energy Situation</i> section of an energy efficiency white paper for the State Governor. Speaker Scores of speaking engagements at conferences, community colleges, and community groups for two decades, including: ▪ American Solar Energy Society; <i>Making the Benefits of RE Real</i>, and <i>World Oil Depletion and Its Implications for U.S. Energy Policy</i> ▪ Pierce Cedar Creek RE Conference - Keynote speaker: <i>RE Cornucopia</i> ▪ PBS Documentary: <i>Michigan's Green Energy Economy</i> Contributing Writer Home Power Magazine, The Rock River Times, ReNews, Energy Paths, Energy Times

TELECOM
EXPERIENCE

Century Link Communications (formerly Level-3, Global Crossing, Frontier, and Allnet), Southeastern Michigan – September 1987 to March 2002, December 2002 – May 2018

Sr. Software Architect

Design and specify software changes to meet program objectives.

- Define project scope, deliverables, schedule and budget.
- Develop software specifications.

Sr. Product Development Manager

Plan, direct, and coordinate all work activities to build new services on-time and within budget.

- Create cross-functional project teams with members from various departments; build team commitment to project objectives.
- Define project scope, deliverables, schedule and budget.
- Create or update business processes to support new products.
- Develop software specifications.

Director, Product Platform Development

Responsible for the selection, purchase, project management, installation, integration, and operation of multi-million dollar real-time call processing systems.

- Performed vendor/product evaluation, purchase negotiations and installation project management.
- Managed staff of 23 Software Engineers developing real-time call processing software and integrating purchased systems.

Senior Manager of Hardware Integration

Responsible for evaluation, selection, engineering, purchase, and installation of all switching equipment and Digital Cross-connect Systems (DCS).

- Planned and managed annual capital budget in excess of \$25M.
- Negotiated pricing and payment terms, installation schedules, and acceptance testing procedures.
- Created network traffic forecasting model for budgetary and capacity planning. Selected sites to close for economic efficiency.
- Provided Project Management of equipment purchases, moves, and installs to facilitate consolidation of four acquired carrier switching networks into one fully integrated network.

DTE Electric Company
One Energy Plaza, 1635 WCB
Detroit, MI 48226-1279



John A. Janiszewski
(313) 235-7309
john.janiszewski@dteenergy.com

August 4, 2026

Don L. Keskey
Brian W. Coyer
Public Law Resource Center PLLC
University Office Place
333 Albert Avenue, Suite 425
East Lansing, MI 48823

RE: In the matter of the Application of **DTE ELECTRIC COMPANY** for approval of
amendments to Rate D11 and related relief
MPSC Case No: U-22061

Dear Mr. Keskey:

Attached for electronic filing in the above captioned matter is DTE Electric Company's Response to the Great Lakes Renewable Energy Association's First Discovery Request. The attachment to the response is being provided to the respective parties via the following link listed below:

Public Portal Link: [U-22061 Large Load Provision - Public Discovery](#)

Also attached is the Proof of Service.

Very truly yours,
**John A.
Janiszewski**
Digitally signed by John
A. Janiszewski
Date: 2026.08.04 13:06:09
-04'00'
John A. Janiszewski

JAJ/cdm
Attachments

cc: Service List

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.1

Respondent: A. Willis

Page: 1 of 1

Question: 1. What is the approximate aggregated capacity (GW) of data center proposals about which DTE Electric is currently in discussions with developers?

Answer: DTE Electric objects to the request because it seeks information concerning prospective and potentially confidential customer development discussions that is outside the scope of, and not relevant or proportional to, this proceeding concerning generally applicable large-load tariff provisions. Aggregate load forecasts and the resource-planning implications of projected customer demand are addressed through the Company's integrated resource-planning process. Subject to and without waiving the objection, approximately 5-6 GW of aggregated capacity (GW) of data center proposals are presently in various stages of engagement and development regarding potentially requesting service from DTE Electric.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.2a

Respondent: M. Witkowski

Page: 1 of 1

Question: 2. Data centers in Texas and Virginia have simultaneously tripped off-grid (switched to backup generation) in response to very brief transients on the power grid, causing a sudden and dramatic drop in load. Texas has recently instituted mandatory “ride-through” rules for data centers (see: <https://www.utilitydive.com/news/texas-puc-approves-ride-through-rules-data-centers/825051/>).

a. What service requirements or interconnect standards will apply to future large load customers to address UPS ride-through rules?

Answer: The Company is developing a framework of Operating Parameters for all Large Load customers which will include ride through requirements for voltage, and frequency conditions. To the extent new rules related to ride through or other conditions are established by an applicable regulatory body, the Company will comply with them.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.2b

Respondent: M. Witkowski

Page: 1 of 1

Question: 2. Data centers in Texas and Virginia have simultaneously tripped off-grid (switched to backup generation) in response to very brief transients on the power grid, causing a sudden and dramatic drop in load. Texas has recently instituted mandatory “ride-through” rules for data centers (see: <https://www.utilitydive.com/news/texas-puc-approves-ride-through-rules-data-centers/825051/>).

b. To what degree is DTE Electric engaged with the MISO Large Load Working Group?

Answer: The Company objects to the extent the request seeks information regarding internal deliberations, regulatory advocacy, or participation in external stakeholder processes, which are not relevant to this proceeding and may implicate commercially sensitive or deliberative communications. Subject to and without waiving the foregoing objection, the Company actively participates in the MISO LLWG by attending sessions, reviewing documentation, and providing feedback to MISO.

Attachment: None

Co-respondent: A. Willis

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.2c

Respondent: M. Witkowski

Page: 1 of 1

Question: 2. Data centers in Texas and Virginia have simultaneously tripped off-grid (switched to backup generation) in response to very brief transients on the power grid, causing a sudden and dramatic drop in load. Texas as recently instituted mandatory “ride-through” rules for data centers (see: <https://www.utilitydive.com/news/texas-puc-approves-ride-through-rules-data-centers/825051/>).

c. Does DTE Electric believe that the existing rules are adequate to protect grid reliability and power quality due to large load customers simultaneously tripping off-grid?

Answer: DTE Electric objects to this request on the grounds that the generalized reference to “existing rules” is unduly vague and ambiguous and further that the question assumes facts regarding “large load customers simultaneously tripping off-grid” which has not occurred on DTE Electric’s system and assumes facts as relevant to DTE Electric based upon operational experience in other jurisdictions described in a trade publication. Subject to and notwithstanding the foregoing objection, the Company responds that current processes protect grid reliability and power quality. Large Load customers introduce new situations which may necessitate additional reliability and operational requirements.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.2ci

Respondent: M. Witkowski

Page: 1 of 1

Question: 2. Data centers in Texas and Virginia have simultaneously tripped off-grid (switched to backup generation) in response to very brief transients on the power grid, causing a sudden and dramatic drop in load. Texas as recently instituted mandatory “ride-through” rules for data centers (see: <https://www.utilitydive.com/news/texas-puc-approves-ride-through-rules-data-centers/825051/>).

c. Does DTE Electric believe that the existing rules are adequate to protect grid reliability and power quality due to large load customers simultaneously tripping off-grid?

i. If not, what actions is the Company taking to expand, strengthen, or deepen these requirements?

Answer: See the Company’s response to GLREA 1.2a.

Attachment: *None*

Co-respondent: A. Willis

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.3a

Respondent: A. Willis

Page: 1 of 1

Question: 3. Some data centers have been sources of power quality problems (see: <https://flex.com/resources/power-quality-the-unseen-phenomenon-behind-some-of-the-biggest-data-center-challenges>). These power quality issues may be quite different than harmonics caused by industrial loads.

a. The special contract (Power Supply Agreement) proposed in U-22058 included the development of customer specific operating parameters (section 5.5.2). Is DTE Energy proposing any similar grid protections from future large load customers in the instant case?

Answer: The Company's direct testimony and exhibits characterize its proposal in the instant case. To the extent a regulatory body with applicable jurisdiction establishes rules or requirements related to power quality for large load customers, the Company would comply with those rules. The Company notes that its two executed agreements with large load customers include specific operating parameters.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.3b

Respondent: A. Willis

Page: 1 of 1

Question: 3. Some data centers have been sources of power quality problems (see: <https://flex.com/resources/power-quality-the-unseen-phenomenon-behind-some-of-the-biggest-data-center-challenges>). These power quality issues may be quite different than harmonics caused by industrial loads.

b. Do any contractual agreements that future large load customers must sign to get electric service provide DTE Electric and its customers protection from data center induced power quality issues (including harmonics)? If not, why not? If so, fully describe.

Answer: Refer to the Company's response to GLREADE-1.3a.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.3c

Respondent: A. Willis

Page: 1 of 1

Question: 3. Some data centers have been sources of power quality problems (see: <https://flex.com/resources/power-quality-the-unseen-phenomenon-behind-some-of-the-biggest-data-center-challenges>). These power quality issues may be quite different than harmonics caused by industrial loads.
c. What is the lowest power factor permitted for industrial customers under rate schedule D11?

Answer: 70%. Refer to page D-48.03 of the Company's rate book, which says in part:

"The rates and charges under this tariff are based on the customer maintaining a power factor of not less than 85% lagging. Any power factor less than 70% will not be permitted and the customer will be required to install at his own expense such corrective equipment as may be necessary to improve power factor..."

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.3d

Respondent: M. Witkowski

Page: 1 of 1

Question: 3. Some data centers have been sources of power quality problems (see: <https://flex.com/resources/power-quality-the-unseen-phenomenon-behind-some-of-the-biggest-data-center-challenges>). These power quality issues may be quite different than harmonics caused by industrial loads.
d. How does DTE Electric measure the power factor that an industrial customer causes?

Answer: Power factor is not “caused” by customers, rather it is calculated by the relationship of real and reactive power usage by each customer. DTEE measures these values and calculates power factor at the revenue meters for each point of interconnection (e.g., customer metering point).

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.3e

Respondent: M. Witkowski

Page: 1 of 1

Question: 3. Some data centers have been sources of power quality problems (see: <https://flex.com/resources/power-quality-the-unseen-phenomenon-behind-some-of-the-biggest-data-center-challenges>). These power quality issues may be quite different than harmonics caused by industrial loads.
e. How does DTE Electric conduct on-going monitoring of the power factor of industrial customers, to ensure that equipment changes the customer makes do not change their power factor below the limit?

Answer: DTE Electric records power factor information as part of the standard billing process. Active monitoring processes for Large Load customers will be established to ensure Large Load customers are adhering to the minimum power factor requirements for each of their Operating Parameter agreements.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.3f

Respondent: M. Witkowski

Page: 1 of 1

Question: 3. Some data centers have been sources of power quality problems (see: <https://flex.com/resources/power-quality-the-unseen-phenomenon-behind-some-of-the-biggest-data-center-challenges>). These power quality issues may be quite different than harmonics caused by industrial loads.
f. Is DTE Electric's measurement of a customer's power factor able to detect power factor changes that occur repeatedly, but for very brief durations (milliseconds)?

Answer: The Company objects to the question on the basis that the request to explain DTE Electric's approach to measuring a customer's power factor is not relevant to the Large Load Provision tariff changes presented in the Company's Application, is beyond the scope of the current proceeding, and is not proportional to the needs of the case. Subject to and without waiving the foregoing objection, the Company states that power factor is measured at minimum, at each customer meter or point of interconnection between DTEE and the customer. The meters DTE currently utilizes for primary service customers samples at a rate of 1024 samples per cycle or roughly 61,440 samples per second.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.4a

Respondent: M. Witkowski

Page: 1 of 1

Question: 4. Data centers have demonstrated an ability to ramp load up and down very rapidly (micro-seconds). What ramp rate limits will apply to future large load customers?

a. In what rule, contract, or agreement are these ramp rate rules defined and specified.

Answer: The Company is developing Operating Parameters for each Large Load customer. Within the Operating Parameters are permissible ramp rates for load up/down during start and stop of compute models, as well as ramp rate limitations for load oscillations. While these are calculated and may be site specific, as requirements are established by MISO, the Company will comply as necessary.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.4b - bi

Respondent: M. Witkowski

Page: 1 of 1

Question: 4. Data centers have demonstrated an ability to ramp load up and down very rapidly (micro-seconds). What ramp rate limits will apply to future large load customers?

b. Are there limits to how fast a large load customer may reduce load (vs. increase load)?

i. If so, what are they?

Answer: See GLREADE-1.4a.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.4c

Respondent: M. Witkowski

Page: 1 of 1

Question: 4. Data centers have demonstrated an ability to ramp load up and down very rapidly (micro-seconds). What ramp rate limits will apply to future large load customers?

c. Is DTE Electric confident that the existing ramp rate rules are adequate to protect the grid and other customers from large load customer's rapid ramp rates causing grid instability? If yes, fully explain.

Answer: DTE Electric objects to this request on the grounds that the generalized reference to "existing ramp rate rules" is unduly vague and ambiguous and further that the question assumes facts regarding "large load customers rapid ramp rates causing grid instability" which has not occurred on DTE Electric's system and assumes facts as relevant to DTE Electric. Subject to and without waiving the foregoing objection, see the Company's response to GLREADE 1.4a. In addition to the response for 1.4a, DTE recognizes the potential applicability of additional ramp rate rules based on system conditions and applicable regulatory requirements.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.4ci

Respondent: M. Witkowski

Page: 1 of 1

Question: 4. Data centers have demonstrated an ability to ramp load up and down very rapidly (micro-seconds). What ramp rate limits will apply to future large load customers?

c. Is DTE Electric confident that the existing ramp rate rules are adequate to protect the grid and other customers from large load customer's rapid ramp rates causing grid instability? If yes, fully explain.

i. If not, what actions is the Company taking to expand, strengthen, or deepen these requirements?

Answer: In addition to the response of 1.4c, the Company continues to perform internal studies on allowable ramp rates, coordinates with ITC on their studies of the same and participates with MISO's LLWG covering the same topic. Requiring operating parameters to be finalized prior to energization, monitoring adherence to the parameters and reserving the right for disconnection of service are built into the agreements with each potential Large Load customer.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.5a

Respondent: A. Willis

Page: 1 of 1

Question: 5. When was the last time DTE Electric had to shed load?
a. How long did that condition persist?

Answer: The Company objects to the question on the basis that the request to explain the last time DTE Electric had to shed load and how long did that condition persist is not relevant to the Large Load Provision tariff changes presented in the Company's Application, is beyond the scope of the current proceeding, and is not proportional to the needs of the case. Subject to and without waiving the foregoing objection, the Company states that DTE Electric is not aware of ever having been required to shed firm load. DTE has implemented its demand response assets to reduce demand when requested to do so by MISO.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.6a

Respondent: A. Willis

Page: 1 of 1

Question: 6. In concurrent case U-22059, the Company has proposed changes in its Emergency Electric Procedures in Section C2 of its Rate Book. If approved, what, if any, impact will these changes have in the Company's next (and subsequent) filing in the MISO resource adequacy process?
a. If approved, what, if any, impact will these changes have in the Company's next (and subsequent) Michigan capacity demonstration filings (MCL 460.6w)?

Answer: The Company does not submit resource adequacy filings with MISO. There is no impact on the Company's capacity demonstration filings with the MPSC.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.7

Respondent: A. Willis

Page: 1 of 1

Question: 7. List the most recent three dates on which DTE Electric invoked all available demand response (DR) measures, how many hours DR was invoked, and how much load DR removed or deferred (MW).

Answer:

Date	# of Hours	Peak MW Reduction
7/15/2026	<1	TBD
1/24/2026	4	118
12/23/2022	1	117

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.8

Respondent: A. Willis

Page: 1 of 1

Question: 8. If the Company has, or anticipates a capacity shortfall, but it's total DR portfolio could reduce load by more than the shortfall, how does the Company prioritize or sequence to which customers it will invoke demand response upon?

Answer: Please see the Company's answer to GLREADE 1.5a. If a situation arises where MISO calls upon the Company's DR resources, all interruptible customers are dispatched at the same time.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.9a

Respondent: A. Willis

Page: 1 of 1

Question: 9. How does demand response (DR) affect the Company's capacity in the MISO resource adequacy process?
a. How much DR capacity did the Company include in its most recent resource adequacy filing with MISO?

Answer: Demand response qualifies as a capacity resource within the MISO construct and can be converted into MISO Zonal Resource Credits (ZRCs). ZRCs count towards meeting the Company's Planning Reserve Margin Requirements. The Company does not submit any resource adequacy filings with MISO.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.9b

Respondent: A. Willis

Page: 1 of 1

Question: 9. How does demand response (DR) affect the Company's capacity in the MISO resource adequacy process?

b. How does demand response (DR) affect the Company's capacity in the Michigan capacity demonstration process (MCL 460.6w)?

Answer: See the Company's response to GLREADE-1.9a. Demand response is included as a planning resource in the Company's capacity demonstration filings with the MPSC. It is part of the overall resource mix that demonstrates the Company has sufficient resources to serve its customers.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.10a

Respondent: A. Willis

Page: 1 of 1

Question: 10. In the most recent 12-months of MISO capacity auctions, was DTE Energy a net buyer or a net seller?

a. How much net capacity did the Company buy or sell?

Answer: In the Planning Year 2026-2027 MISO Planning Resource Auction (PRA), the Company purchased 23.6 MW of capacity in the summer season, purchased 315.0 MW of capacity in the fall season, sold 1,536.2 MW of capacity in the winter season, and sold 516.3 MW of capacity in the spring season. The results of the PY 2026-2027 PRA were released for all seasons on April 28, 2026.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.10b

Respondent: A. Willis

Page: 1 of 1

Question: 10. In the most recent 12-months of MISO capacity auctions, was DTE Energy a net buyer or a net seller?
b. What was the net amount of money paid to or received from MISO?

Answer: In the Planning Year 2026-2027 MISO Planning Resource Auction (PRA), the Company purchased \$921,240 of capacity in the summer season, purchased \$972,317 of capacity in the fall season, sold \$4,973,140 of capacity in the winter season, and sold \$361,472 of capacity in the spring season. The results of the PY 2026-2027 PRA were released for all seasons on April 28, 2026.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.10c

Respondent: A. Willis

Page: 1 of 1

Question: 10. In the most recent 12-months of MISO capacity auctions, was DTE Energy a net buyer or a net seller?
c. If the seasonal PRA prices had all been substantially higher during the period, would that have produced upward or downward pressure on DTE Electric customer rates?

Answer: It is not possible to determine the customer cost impact as the auction results would be different (e.g. different resources would potentially clear and net payments would change). DTE does not have the information to make conclusions on the cost impact to customer rates.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.11a

Respondent: A. Willis

Page: 1 of 1

Question: 11. Over any recent 12-month period, was DTE Electric a net buyer or seller in the daily MISO energy auctions.

a. How much net energy did the Company buy or sell over the 12-month period?

Answer: Yes, the Company was a net buyer and a net seller on various days in the most recent 2025 PSCR Reconciliation filing (e.g. calendar year 2025). The net energy position during 2025 was a net sales position of 8,964 GWh as described in case U-21595. The Company can be a net seller or buyer in any hour of the day. This is discussed in the Company's PSCR filings.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.11b

Respondent: A. Willis

Page: 1 of 1

Question: 11. Over any recent 12-month period, was DTE Electric a net buyer or seller in the daily MISO energy auctions.

b. What was the net amount of money paid to or received from MISO?

Answer: See Case No. U-21595 for the Company's 2025 PSCR Reconciliation. The net amount received from MISO was \$304,112,000.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.11c

Respondent: A. Willis

Page: 1 of 1

Question: 11. Over any recent 12-month period, was DTE Electric a net buyer or seller in the daily MISO energy auctions.
c. If LMP had been substantially higher during all hours of the 12-month period, would that have produced upward or downward pressure on DTE Electric customer rates?

Answer: It is not possible to determine the customer cost impact as the market results would be different (e.g. different resources would potentially clear and net payments would change). DTE does not have the information to make conclusions on the cost impact to customer rates.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.12a

Respondent: A. Willis

Page: 1 of 1

Question: 12. Please provide DTE Electric system-wide hourly load data for the months of June, July, August, and September, 2025.

a. What was the Company's peak hour and peak load during the summer of 2025?

Answer: See attachment "U-22061 GLREADE-1.12a-01 System Hourly Load June through September 2025". The Company's peak occurred on the 17th hour of July 24th and was 11,275,783 kW.

Attachment: U-22061 GLREADE-1.12a-01 System Hourly Load June through September 2025

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.13

Respondent: A. Willis

Page: 1 of 1

Question: 13. What is the most recent MISO value for Cost of New Entry (CONE)?

Answer: The most recent MISO CONE value approved by FERC is \$137,510 / MW-year for the 2026/27 Planning Year.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.14a

Respondent: A. Willis

Page: 1 of 1

Question: 14. If a customer that met the criteria for the proposed large load tariff built on-site generation to meet part or all of their load, but still wanted to interconnect to DTE Electric's grid, what tariff, rate sheet, or other rules would apply?. Under what circumstances would such a customer be subject to standby charges, and what stand-by charges would apply?

Answer: The applicable tariff would depend on the size and resource type of any behind the meter resource (either Rider 5, Rider 14, or Rider 18). Rider 3 is the Company's standby rate, which is applicable based on the size and type of the customer sited resource and underlying rate schedule.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.15a

Respondent: A. Willis

Page: 1 of 1

Question: 15. If a customer that met the criteria for the proposed large load tariff wanted to participate in the Company's demand response (DR) program, what tariff and rules would apply?

a. Does the structure of D11 rate allow a customer to participate in DR as well?

Answer: Yes.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.16a

Respondent: A. Willis

Page: 1 of 1

Question: 16. If a commercial or industrial customer currently enrolled in the Company's demand response (DR) program has backup generators and DTE Electric invokes DR, is it permissible for the customer to take their entire load off the grid, by powering their load with their backup generators, as a means of meeting the DR request?

a. Is DTE Electric aware of any commercial or industrial customers that have used backup generators to meet a Company DR request in the past three years?

Answer: The Company is not responsible for how commercial or industrial customers comply with their demand response commitments, nor does it have visibility into how customers comply.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.16b

Respondent: A. Willis

Page: 1 of 1

Question: 16. If a commercial or industrial customer currently enrolled in the Company's demand response (DR) program has backup generators and DTE Electric invokes DR, is it permissible for the customer to take their entire load off the grid, by powering their load with their backup generators, as a means of meeting the DR request?

b. If a commercial or industrial customer did use backup generators as a method to meet a Company DR request, does the Company have a way to distinguish that method vs. the customer shutting down operations?

Answer: See GLREADE-1.16a

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.17a

Respondent: A. Willis

Page: 1 of 1

Question: 17. What steps does the Company plan to take to ensure that data centers on the proposed tariff will be billed enough to cover the full costs they impose on the Company?

a. How can the Company ensure that there is no cross subsidy when new large load customers are mixed into the industrial customer class and on the same rate sheet as other industrial customers?

Answer: The Company's rates are cost based and approved by the Commission. The Company notes that its pending Case No. U-22046 includes six alternative cost of service studies, filed at the direction of the Commission, to explore questions of cost of service and rate making with large loads.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.18

Respondent: A. Willis

Page: 1 of 1

Question: 18. How will the Company ensure that it has sufficient capacity to service a new large load customer before providing them service?

Answer: The Company manages capacity on a systemwide, and not customer-specific, basis. The Company's annual capacity demonstrations and periodic integrated resources plans ensure sufficient capacity to serve all customers, including large load customers. The Company studies large load customers to ensure that it can provide service while maintaining sufficient capacity.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.19a

Respondent: A. Willis

Page: 1 of 1

Question: 19. What steps has the Company taken to determine the likely load profile of data center customers?

a. Has Edison Electric Institute (EEI) provided any studies or information on the load profile of data center customers? If so, provide a reference and a link to such studies or information.

Answer: DTE Electric objects to the request as overly broad and outside the scope of, and not relevant or proportional to, this proceeding which concerns generally applicable large load tariff provisions. The Company's proposal in this case does not concern future load profiles of potential large load customers nor depend on the adoption of a generic load profile for potential large load customers. Subject to and without waiving its objection, the Company would respond as follows.

The Company forecasts large loads based on information received from specific customers and known at the time. Although the Company may also evaluate company-specific assumptions concerning potential large loads in planning sensitivities, the Company does not generically estimate large load customer load profiles. The Company has not relied upon any EEI studies.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.19b

Respondent: A. Willis

Page: 1 of 1

Question: 19. What steps has the Company taken to determine the likely load profile of data center customers?

b. Some electric utilities service numerous data center customers. Have any of them published data-center aggregated load figures that would reveal the general load profile of this new technology? If so, provide a reference and a link to such information.

Answer: DTE Electric objects to the request as overly broad and outside the scope of, and not relevant or proportional to, this proceeding, which concerns generally applicable large-load tariff provisions. The Company's proposal in this case does not concern future load profiles of potential large load customers nor depend on the adoption of a generic load profile for potential large load customers. The request also asks the Company to identify and evaluate publications by a vague and undefined universe of other electric utilities, without identifying any particular utility, publication or relevant time period. Subject to and without waiving its objection, the Company would respond as follows.

The Company forecasts large loads based on information received from specific customers and known at the time. Although the Company may also evaluate company-specific assumptions concerning potential large loads in planning sensitivities, the Company does not generically estimate large load customer load profiles.

Attachment: *None*

Co-respondent: Legal

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.20a

Respondent: A. Willis

Page: 1 of 1

Question: 20. In the event that a large load customer defaults, what are the collateral requirements to ensure that the exit fee is paid in full?
a. Who will assess the quality of collateral?

Answer: Refer to my testimony at Q/A 25 for a discussion of collateral requirements. The Company will determine the form of collateral required based on its assessment.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-1.21

Respondent: A. Willis

Page: 1 of 1

Question: 21. Is DTE Electric free to report a customer's energy use, load profile, and total payments, or are those figures considered confidential information?

Answer: The Company does not publish individual customer information pursuant to its data privacy tariff (Rate Book Section C14.1).

Attachment: *None*

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the Application of)
DTE ELECTRIC COMPANY)
for approval of amendments to Rate D11 and)
related relief)

Case No. U-22061

PROOF OF SERVICE

STATE OF MICHIGAN)
) ss.
COUNTY OF WAYNE)

CAITLIN MYERS states that on August 4, 2026, she served a copy of DTE Electric Company's Response to the Great Lakes Renewable Energy Association's First Discovery Request in the above captioned matter, via electronic mail and portal link, upon the persons listed on the attached service list.

Caitlin Myers  Digitally signed by
Caitlin Myers
Date: 2026.08.04
13:06:28 -04'00'

CAITLIN MYERS

MPSC Case No. U-22061
Service List
Page 1

**ASSOCIATION OF BUSINESSES
ADVOCATING TARIFF EQUITY**

Michael J. Pattwell
Ben Holwerda
Clark Hill PLC
215 South Washington Square, Suite 200
Lansing, MI 48933
mpattwell@clarkhill.com
bholwerda@clarkhill.com

Stephen A. Campbell
Clark Hill PLC
500 Woodward Avenue, Suite 3500
Detroit, MI 48226
scampbell@clarkhill.com

ABATE Consultants:

James Dauphinais
Jessica York
Brian Andrews
jdauphinais@consultbai.com
jyork@consultbai.com
bandrews@consultbai.com

**ENVIRONMENTAL LAW & POLICY
CENTER; ECOLOGY CENTER; UNION
OF CONCERNED SCIENTISTS; VOTE
SOLAR (CEO)**

Daniel Abrams
Katie Duckworth
Environmental Law & Policy Center
35 E. Wacker Drive, Suite 1600
Chicago, IL 60601
dabrams@elpc.org
kdduckworth@elpc.org
mpscdocket@elpc.org

Bradley Klein
Alondra Estrada
Katie Toolan
bklein@elpc.org
astrada@elpc.org
ktoolan@elpc.org

GERDAU MACSTEEL, INC.

Jennifer Utter Heston
Potomac Law Group PLLC
1717 Pennsylvania Avenue NW, Suite 1025
Washington, DC 20006
jheston@potomacclaw.com

**GREAT LAKES RENEWABLE ENERGY
ASSOCIATION INC.**

Don L. Keskey
Brian W. Coyer
University Office Place
333 Albert Avenue, Suite 425
East Lansing, MI 48823
donkeskey@publiclawresourcecenter.com
bwcoyer@publiclawresourcecenter.com

MICHIGAN ATTORNEY GENERAL

Joel King
Lucas Wollenzien
Assistant Attorney General
ENRA Division
525 W. Ottawa Street, 6th Floor
P.O. Box 30755
Lansing, MI 48909
kingj38@michigan.gov
wollenzienl@michigan.gov
ag-enra-spec-lit@michigan.gov

MPSC STAFF

Adam Cozort
Monica M. Stephens
Assistant Attorney General
Public Service Division
7109 West Saginaw Hwy, 3rd Floor
Lansing, MI 48917
cozortal@michigan.gov
stephensm11@michigan.gov

Lori Mayabb
MPSC Staff Case Coordinator
mayabbl@michigan.gov

**NATURAL RESOURCES DEFENSE
COUNCIL; SIERRA CLUB**

Christopher M. Bzdok
Sean C. Clark
Troposphere Legal, PLC
420 East Front Street
Traverse City, MI 49686
chris@tropospherelegal.com
sean@tropospherelegal.com

Natasha Fowles, Legal Assistant
Sue Fruchey, Legal Assistant
natasha@tropospherelegal.com
sue@tropospherelegal.com

MPSC Case No. U-22061
Service List
Page 2

Shannon Fisk
Jacob Elkin
Helen Li
sfisk@earthjustice.org
jelkin@earthjustice.org
hli@earthjustice.org

Nodal Operating Guide Revision Request

NOGRR Number	282	NOGRR Title	Large Electronic Load Ride-Through Requirements
Date Posted	November 14, 2025		

Requested Resolution	Normal
Nodal Operating Guide Sections Requiring Revision	2.6.4, Frequency Ride-Through Requirements for Large Electronic Loads (new) 2.14, Voltage Ride-Through Requirements for Large Electronic Loads (new)
Related Documents Requiring Revision/Related Revision Requests	Nodal Protocol Revision Request (NPRR) 1308, Related to NOGRR282, Large Electronic Load Ride-Through Requirements
Revision Description	This Nodal Operating Guide Revision Request (NOGRR) establishes frequency and voltage ride-through requirements for Large Electronic Loads.
Reason for Revision	☒ Strategic Plan Objective 1 – Be an industry leader for grid reliability and resilience ☐ Strategic Plan Objective 2 - Enhance the ERCOT region’s economic competitiveness with respect to trends in wholesale power rates and retail electricity prices to consumers ☐ Strategic Plan Objective 3 - Advance ERCOT, Inc. as an independent leading industry expert and an employer of choice by fostering innovation, investing in our people, and emphasizing the importance of our mission ☐ General system and/or process improvement(s) ☐ Regulatory requirements ☐ ERCOT Board/PUCT Directive <i>(please select ONLY ONE – if more than one apply, please select the ONE that is most relevant)</i>
Justification of Reason for Revision and Market Impacts	The frequency and voltage ride-through requirements in this NOGRR are necessary to ensure Large Electronic Loads do not present a reliability risk to the system by tripping when frequency and voltage excursions within a specified range occur. ERCOT has identified many events since October 2022 that included Load loss from one or more LELs during a typical voltage disturbance in which system

Nodal Operating Guide Revision Request

	protection operated as designed. As LELs increase on the ERCOT System, similar events would be expected to increase in magnitude and frequency, leading to frequency instability and other reliability problems absent frequency and voltage ride-through requirements. ERCOT has also identified ride-through risks associated with other Large Loads and intends to submit a NOGRR to address those risks. ERCOT anticipates that the requirements for those Large Loads could differ from those proposed in this NOGRR based on differences in the technology of the loads, just as ERCOT's ride-through requirements for different generating technologies differ from one technology to another.
--	---

Sponsor	
Name	Patrick Gravois
E-mail Address	patrick.gravois@ercot.com
Company	ERCOT
Phone Number	512-248-4695
Cell Number	
Market Segment	Not applicable

Market Rules Staff Contact	
Name	Cory Phillips
E-Mail Address	cory.phillips@ercot.com
Phone Number	512-248-6464

Proposed Guide Language Revision

2.6.4 Frequency Ride-Through Requirements for Large Electronic Loads

- (1) A Customer that proposes to interconnect or maintains an interconnection of a Large Electronic Load (LEL) with the ERCOT System shall ensure the LEL complies with the frequency ride-through requirements of this section, unless:
 - (a) The LEL received approval to energize from ERCOT on or before November 14, 2025; or
 - (b) The LEL satisfied the following requirements on or before November 14, 2025:

Nodal Operating Guide Revision Request

- (i) Its Large Load Interconnection Study (LLIS) has been completed and results communicated in the manner contemplated by paragraph (6) of Planning Guide Section 9.4, LLIS Report and Follow-up; and
 - (ii) The interconnecting TDSP for the LEL has provided the confirmation or letter contemplated in Planning Guide Section 9.5, Interconnection Agreements and Responsibilities.
- (2) An LEL shall ride through frequency disturbances of the magnitude and duration specified in Table A below, as measured at the LEL's Service Delivery Point, or if the LEL is co-located with a Generation Resource or Energy Storage Resource, at the Point of Interconnection Bus (POIB) of that Resource. An LEL is not required to ride-through if it is either performing in accordance with its interconnecting TDSP's Under-Frequency Load Shed (UFLS) program or providing an Ancillary Service that would require the LEL to trip or reduce consumption due to a frequency disturbance.

Table A

Frequency (f) in (Hz)	Minimum Ride-Through Time (seconds)
$f > 61.8$	May ride-through or trip
$61.2 < f \leq 61.8$	299
$58.8 \leq f \leq 61.2$	continuous
$57.0 \leq f < 58.8$	299
$f < 57.0$	May ride-through or trip

- (3) Nothing in paragraph (2) above shall be interpreted to require an LEL to trip or transfer load to backup generation for frequency conditions beyond those for which ride-through is required.
- (4) If an LEL is consuming electric current from the grid at the time of the frequency disturbance, the LEL shall continue to consume electric current from the grid during frequency deviations requiring ride-through. In addition, an LEL should continue to consume active power within 10% of the pre-disturbance level during frequency deviations requiring ride-through.
- (5) If protection systems are installed and activated to trip the LEL, they shall enable the LEL to ride-through frequency conditions beyond those defined in paragraph (2) above to the maximum level the equipment allows, unless the protection systems are set to respond to an UFLS event or Ancillary Service obligation.
- (6) If frequency protection schemes are installed and activated to trip an LEL, they shall use filtered quantities or add sufficient time delays to prevent misoperations while providing

Nodal Operating Guide Revision Request

the desired equipment protection. Protection schemes shall not trip an LEL based on an instantaneous frequency measurement.

- (7) If ERCOT determines that an LEL has failed to ride through a frequency disturbance in accordance with any requirement in this Section 2.6.4:
 - (a) The interconnecting TDSP shall provide available information to ERCOT to assist with ERCOT's event analysis;
 - (b) The Customer representing the LEL shall:
 - (i) Investigate and determine the root cause of the frequency ride-through failure and report the results of the investigation to ERCOT within 90 days of ERCOT's request;
 - (ii) Develop a plan to ensure the LEL can meet the applicable ride-through performance requirements and submit the plan to ERCOT within 90 days of completion of (i) above; and
 - (iii) Implement the plan upon ERCOT approval within 180 days of (ii) above unless ERCOT approves a longer timeline.
 - (c) Notwithstanding the requirements of paragraph (b) above, if ERCOT determines that the operation of an LEL following a failure to comply with the requirements of this Section 2.6.4 poses an imminent risk to local or system reliability, ERCOT may require the LEL to disconnect from the ERCOT System and remain disconnected until the Customer representing the LEL has demonstrated to ERCOT's satisfaction that the LEL can comply with the ride-through performance requirements of this Section.

2.14 Voltage Ride-Through Requirements for Large Electronic Loads

- (1) A Customer that proposes to interconnect or maintains an interconnection of a Large Electronic Load (LEL) with the ERCOT System shall ensure the LEL complies with the voltage ride-through requirements of this section, unless:
 - (a) The LEL received approval to energize from ERCOT on or before November 14, 2025; or
 - (b) The LEL satisfied the following requirements on or before November 14, 2025:
 - (i) Its Large Load Interconnection Study (LLIS) has been completed and results communicated in the manner contemplated by paragraph (6) of Planning Guide Section 9.4, LLIS Report and Follow-up; and
 - (ii) The interconnecting TDSP for the LEL has provided the confirmation or letter contemplated in Planning Guide Section 9.5, Interconnection Agreements and Responsibilities.

Nodal Operating Guide Revision Request

- (2) An LEL interconnecting with the ERCOT System shall ride through the root-mean-square positive sequence voltage conditions of the magnitude and duration specified in Table A below, as measured at the LEL's Service Delivery Point, or if the LEL is co-located with a Generation Resource or Energy Storage Resource, at the Point of Interconnection Bus (POIB) of that Resource. An LEL shall remain connected to the Transmission Grid during voltage conditions requiring ride-through. Additional LEL performance requirements for voltage conditions requiring ride-through are listed below.

Table A

Root-Mean-Square Positive Sequence Voltage (p.u. of nominal)	Minimum Ride-Through Time (seconds)
$V > 1.20$	May ride-through or trip
$1.10 < V \leq 1.20$	2.0
$0.90 \leq V \leq 1.10$	Continuous
$0.80 \leq V < 0.90$	2.0
$0.50 \leq V < 0.80$	0.5
$0.20 \leq V < 0.50$	0.25
$V < 0.20$	0.15

- (a) When voltage at the Service Delivery Point or, if the LEL co-located with a Generation Resource or Energy Storage Resource, at the POIB, remains within the continuous operating range in Table A during a disturbance or exceeds 1.1 per unit and remains below 1.2 per unit for less than 2 seconds for an overvoltage condition, the LEL shall continue consuming active power from the grid at the pre-disturbance level during the disturbance.
- (b) When voltage at the Service Delivery Point or POIB falls below 0.9 per unit but remains above 0.8 per unit and then returns to above 0.9 per unit within 2 seconds, the LEL shall continue consuming active power from the grid during the low voltage condition. In such cases, the LEL may reduce its active power consumption proportional to the voltage drop but shall return to 90% of its pre-disturbance consumption level from the grid within one second of voltage at the Service Delivery Point or POIB returning to above 0.9 per unit.
- (c) For any voltage condition at the Service Delivery Point or POIB that an LEL is required to ride-through and involves a voltage condition below 0.8 per unit, the LEL may decrease active power consumption from the grid but shall return to at least 90% of its pre-disturbance consumption level from the grid within one second of voltage at the Service Delivery Point or POIB returning to above 0.90 per unit. Additional performance requirements for the allowable reduction of consumption in active power when voltage drops below 0.8 per unit are defined as follows:

Nodal Operating Guide Revision Request

- (i) For any LEL that satisfies the requirements in paragraph (1)(b) above after November 14, 2025 but on or before January 1, 2028, if the LEL needs to temporarily reduce active power consumption from the grid to allow the facility to ride through the voltage disturbance in accordance with the performance requirements defined in paragraph (c) above, that reduction in active power shall be proportional to the voltage drop for any voltage between 0.8 and 0.5 per unit at the Service Delivery Point or POIB, if capable. The LEL may reduce active power consumption as much as needed for voltage drops below 0.5 per unit. If the LEL equipment is not capable of the performance described above, then the LEL may reduce active power consumption as much as necessary to remain connected to the grid but shall return to pre-disturbance consumption as defined in paragraph (c) above.
- (ii) For any LEL that satisfies the requirements in paragraph (1)(b) above after January 1, 2028, the LEL shall continue consuming active power from the grid when the voltage at the Service Delivery Point or POIB is between 0.8 and 0.5 per unit but may temporarily reduce active power consumption from the grid proportional to the voltage drop. When the voltage at the Service Delivery Point or POIB is below 0.5 per unit, the LEL may reduce active power consumption as needed to allow the facility to ride through the voltage disturbance in accordance with the performance requirements defined in paragraph (c) above.
- (d) When a voltage disturbance causes the voltage at the Service Delivery Point or POIB to drop outside the continuous operating range in Table A of paragraph (2) above, an LEL shall not consume electric current during the disturbance at a level that exceeds 125% of its maximum electric current consumption during normal operations.
- (3) Nothing in paragraph (2) above shall be interpreted to require an LEL to trip or transfer load to backup generation for voltage conditions beyond those for which ride-through is required.
- (4) If installed and activated to trip or transfer the LEL, all protection systems (including but not limited to protection for over-/under-voltage) shall enable the LEL to ride-through voltage conditions beyond those defined in paragraph (2) above to the maximum level the equipment allows.
- (5) If instantaneous over-current or over-voltage protection systems are installed and activated to trip or transfer the LEL, they shall use filtered quantities or time delays to prevent misoperation while providing the desired equipment protection. Any alternating current instantaneous over-voltage protection that could disrupt the LEL power

Nodal Operating Guide Revision Request

consumption shall use a measurement window of at least one cycle of fundamental frequency.

- (6) An LEL shall not implement a load trip or transfer scheme that disconnects or transfers load to backup generation due solely to a certain number of voltage sags or swells within a certain period of time if the LEL is required under paragraph (2) above to ride through each such condition.
- (7) If ERCOT determines that an LEL has failed to ride through a voltage disturbance in accordance with any requirement in this Section 2.14:
 - (a) The interconnecting TDSP shall provide available information to ERCOT to assist with ERCOT's event analysis;
 - (b) The Customer representing the LEL shall:
 - (i) Investigate and determine the root cause of the voltage ride-through failure and report the results of the investigation to ERCOT within 90 days of ERCOT's request;
 - (ii) Develop a plan to ensure the LEL can meet the applicable ride-through performance requirements and submit the plan to ERCOT within 90 days of completion of (i) above; and
 - (iii) Implement the plan upon ERCOT approval within 180 days of (ii) above unless ERCOT approves a longer timeline.
 - (c) Notwithstanding the requirements of paragraph (b) above, if ERCOT determines that the operation of an LEL following a failure to comply with the requirements of this Section 2.14 poses an imminent risk to local or system reliability, ERCOT may require the LEL to disconnect from the ERCOT System and remain disconnected until the Customer representing the LEL has demonstrated to ERCOT's satisfaction that the LEL can comply with the ride-through performance requirements of this Section.

DTE Electric Company
One Energy Plaza, 1635 WCB
Detroit, MI 48226-1279



John A. Janiszewski
(313) 235-7309
john.janiszewski@dteenergy.com

September 9, 2026

Don L. Keskey
Brian W. Coyer
Public Law Resource Center PLLC
University Office Place
333 Albert Avenue, Suite 425
East Lansing, MI 48823

RE: In the matter of the Application of **DTE ELECTRIC COMPANY** for approval of
amendments to Rate D11 and related relief
MPSC Case No: U-22061

Dear Mr. Keskey:

Attached for electronic filing in the above captioned matter is DTE Electric Company's First Partial Response (includes all Questions except GLREADE-2.22d) to the Great Lakes Renewable Energy Association's Second Discovery Request. Also attached is the Proof of Service.

Very truly yours,

John A.
Janiszewski

John A. Janiszewski

Digitally signed by John A.
Janiszewski
Date: 2026.09.09 18:57:11 -04'00'

JAJ/erb
Attachments

cc: Service List

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.22a

Respondent: M. Witkowski

Page: 1 of 1

Question: 22. Referencing the Company's response in GLREADE-1.2c: "the question assumes facts regarding 'large load customers simultaneously tripping off-grid' which has not occurred on DTE Electric's system."

a. Is the Company certain that two or more of its customers with UPS systems have never tripped off-grid (switched to backup power) simultaneously in response to a grid transient voltage spike or sag?

Answer: DTE Electric objects to this request to the extent it misrepresents and improperly expands the scope of the Company's response to GLREADE-1.2c. That response did not state that the Company was "certain" that two or more customers with UPS systems had never simultaneously switched to backup power. Rather, GLREADE-1.2c addressed the different premise that large load customers had simultaneously tripped off-grid on DTE Electric's system and explained that such an event had not occurred on DTE Electric's system. The present request expands the inquiry from "large load customers" addressed in GLREADE-1.2c to any two or more customers with UPS systems regardless of customer size, load magnitude, interconnection characteristics, or whether any simultaneous transfer produced a material effect on DTE Electric's system. Thus, the Company further objects that the request, to the extent it seeks information concerning customers and events unrelated to large load service or without a material effect on the electric system, is not relevant to the proposed Large Load Provision at issue in this proceeding and is not proportional to the needs of the case. Subject to and without waiving the foregoing objections, DTE Electric is not aware of an event in which two or more customers with UPS systems simultaneously switched to backup power in response to a transient voltage spike or sag. The Company cannot state with certainty that no such behind-the-meter event has ever occurred.

Attachment: *None*

Co-respondent: Legal

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.22b

Respondent: M. Witkowski

Page: 1 of 1

Question: 22. Referencing the Company's response in GLREADE-1.2c: "the question assumes facts regarding 'large load customers simultaneously tripping off-grid' which has not occurred on DTE Electric's system."

b. Is the Company certain that two or more of its customers with UPS systems have not tripped off-grid (switched to backup power) simultaneously in response to a grid transient voltage spike or sag in the past two years?

Answer: DTE Electric objects to this request to the extent it misrepresents and improperly expands the scope of the Company's response to GLREADE-1.2c. That response did not state that the Company was "certain" that two or more customers with UPS systems had never simultaneously switched to backup power. Rather, GLREADE-1.2c addressed the different premise that large load customers had simultaneously tripped off-grid on DTE Electric's system and explained that such an event had not occurred on DTE Electric's system. The present request expands the inquiry from "large load customers" addressed in GLREADE-1.2c to any two or more customers with UPS systems regardless of customer size, load magnitude, interconnection characteristics, or whether any simultaneous transfer produced a material effect on DTE Electric's system. Thus, the Company further objects that the request, to the extent it seeks information concerning customers and events unrelated to large load service or without a material effect on the electric system, is not relevant to the proposed Large Load Provision at issue in this proceeding and is not proportional to the needs of the case. Subject to and without waiving the foregoing objections, DTE Electric is not aware of an event in which two or more customers with UPS systems simultaneously switched to backup power in response to a transient voltage spike or sag. The Company cannot state with certainty that no such behind-the-meter event has ever occurred.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.22bi

Respondent: M. Witkowski

Page: 1 of 1

Question: 22. Referencing the Company's response in GLREADE-1.2c: "the question assumes facts regarding 'large load customers simultaneously tripping off-grid' which has not occurred on DTE Electric's system."
b. Is the Company certain that two or more of its customers with UPS systems have not tripped off-grid (switched to backup power) simultaneously in response to a grid transient voltage spike or sag in the past two years?
i. If yes, the Company is certain; what operational system(s), policy(ies), or mechanism(s) would detect such an event (if it occurred)?

Answer: See the Company's response to GLREADE-2.22b.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.22c

Respondent: M. Witkowski

Page: 1 of 1

Question: 22. Referencing the Company's response in GLREADE-1.2c: "the question assumes facts regarding 'large load customers simultaneously tripping off-grid' which has not occurred on DTE Electric's system."

c. Does the Company currently have two or more computing loads (data centers or crypto mining facilities) in service and connected at primary voltage?

Answer: Yes. Based on information available to the Company, DTE Electric currently serves two or more customers operating computing loads at primary voltage.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.22e

Respondent: M. Witkowski

Page: 1 of 1

Question: 22. Referencing the Company's response in GLREADE-1.2c: "the question assumes facts regarding 'large load customers simultaneously tripping off-grid' which has not occurred on DTE Electric's system."

e. Does the Company have a reason to believe that it's system would respond to multiple future large loads simultaneously switching to backup power, in a manner that would be materially different, and more stable, than the electric grids in Virginia and Texas, described in the cited trade publication?

Answer: DTE Electric objects to this request because the phrases "materially different" and "more stable" are vague, the request does not provide engineering data sufficient to establish that the referenced events or electric systems are technically comparable to DTE Electric's system, and the request calls for a speculative comparison among different customer facilities, transmission systems, operating conditions, protection schemes, and disturbance characteristics.

Subject to and without waiving the foregoing objections, the response of DTE Electric's system to a future loss or transfer of multiple large loads would depend on the size, location, timing, and electrical characteristics of the loads; the initiating disturbance; the strength and configuration of the local transmission system; applicable protection and control settings; and the results of coordinated studies with ITC. DTE Electric therefore cannot conclude from the information identified in the request how its system would respond relative to the electric grids in Virginia and Texas involved in the referenced events. DTE Electric addresses these risks through customer-specific studies and binding Operating Parameters established before initial energization.

Attachment: *None*

Co-respondent: Legal

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.23a

Respondent: M. Witkowski

Page: 1 of 1

Question: 23. Referencing the Company's response in GLREADE-1.2a and GLREADE-1.4a about "developing a framework of Operating Parameters for all Large Load customers"

a. Does the Company have a target date for the completion of its framework of operating parameters?

Answer: The Operating Parameters framework is developed. See confidential Exhibit CEO-6, which was also incorporated by reference in my rebuttal testimony.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.23b

Respondent: M. Witkowski

Page: 1 of 1

Question: 23. Referencing the Company's response in GLREADE-1.2a and GLREADE-1.4a about "developing a framework of Operating Parameters for all Large Load customers"
b. Will the Company's framework of operating parameters be public information?

Answer: No.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.23bi

Respondent: M. Witkowski

Page: 1 of 1

Question: 23. Referencing the Company's response in GLREADE-1.2a and GLREADE-1.4a about "developing a framework of Operating Parameters for all Large Load customers"

b. Will the Company's framework of operating parameters be public information?

i. If not, what is the justification for hiding this information?

Answer: DTE Electric objects to the request because the characterization that the Company is "hiding" information is argumentative and an incorrect premise. Subject to and without waiving the foregoing objections, customer-specific technical studies and Operating Parameters are treated as confidential because they may reveal sensitive information about the electric grid, including system constraints, contingency performance, protection and control assumptions, operating limitations, customer-facility configurations, and mitigation measures. They may also contain confidential, proprietary, or commercially sensitive customer information. Public disclosure of this information could undermine grid security, disclose customer-specific information, or reveal Critical Energy Infrastructure Information. Access to finalized customer-specific Operating Parameters is limited to DTE Electric, the customer, and ITC unless disclosure is otherwise required by an applicable rule, tariff, or order. . See my rebuttal testimony, Q21/A21 (starting on page MJW-13-Rebuttal line 11).

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.23bii

Respondent: M. Witkowski

Page: 1 of 1

Question: 23. Referencing the Company's response in GLREADE-1.2a and GLREADE-1.4a about "developing a framework of Operating Parameters for all Large Load customers"

b. Will the Company's framework of operating parameters be public information?

ii. If not, when will prospective large load customers know what operating parameters they will be expected to operate under or within?

Answer: As outlined in my rebuttal, Q14/A14, the final Operating Parameters are developed through site-specific technical studies by the Company and ITC, which require input from each customer. Prospective large load customers are provided the Company's standard Operating Parameters framework during the service-development process. The specific requirements applicable to an individual customer are developed and communicated as the necessary customer information and technical-study results become available. The customer-specific Operating Parameters must be finalized prior to initial energization of a customer's facility.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.23biii

Respondent: M. Witkowski

Page: 1 of 1

Question: 23. Referencing the Company's response in GLREADE-1.2a and GLREADE-1.4a about "developing a framework of Operating Parameters for all Large Load customers"

b. Will the Company's framework of operating parameters be public information?

iii. If yes, how can interested parties request a copy of the operating parameters?

Answer: Operating Parameters will not be public.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.23c

Respondent: M. Witkowski

Page: 1 of 1

Question: 23. Referencing the Company's response in GLREADE-1.2a and GLREADE-1.4a about "developing a framework of Operating Parameters for all Large Load customers"

c. Has the Company required any of its existing industrial-class customers to operate within UPS voltage and frequency ride-through requirements?

Answer: DTE Electric objects to the phrase "UPS voltage and frequency ride-through requirements" to the extent it assumes that the Company prescribes a particular technology or requires customers to satisfy ride-through requirements through UPS equipment. Subject to and without waiving the foregoing objection, DTE Electric has not required its existing industrial-class customers to comply with customer-specific voltage and frequency ride-through requirements comparable to the Operating Parameters being developed for new large load customers. However, the Company expects all customers to design and operate their facilities according to industry standards such as the Information Technology Industry Council (ITIC) curve for ride-through.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.23ci

Respondent: M. Witkowski

Page: 1 of 1

Question: 23. Referencing the Company's response in GLREADE-1.2a and GLREADE-1.4a about "developing a framework of Operating Parameters for all Large Load customers"

c. Has the Company required any of its existing industrial-class customers to operate within UPS voltage and frequency ride-through requirements?

i. If yes, are those requirements included in a Company tariff?

Answer: See the Company's response to GLREADE-2.23c.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.23cii

Respondent: M. Witkowski

Page: 1 of 1

Question: 23. Referencing the Company's response in GLREADE-1.2a and GLREADE-1.4a about "developing a framework of Operating Parameters for all Large Load customers"

c. Has the Company required any of its existing industrial-class customers to operate within UPS voltage and frequency ride-through requirements?

ii. If yes, how were those requirements communicated to the customer?

Answer: See the Company's response to GLREADE-2.23c.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.23ciii

Respondent: M. Witkowski

Page: 1 of 1

Question: 23. Referencing the Company's response in GLREADE-1.2a and GLREADE-1.4a about "developing a framework of Operating Parameters for all Large Load customers"

c. Has the Company required any of its existing industrial-class customers to operate within UPS voltage and frequency ride-through requirements?

iii. If yes, please provide a sample copy of those requirements for one customer, with any information that would identify the customer redacted.

Answer: See the Company's response to GLREADE-2.23c.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.23d

Respondent: M. Witkowski

Page: 1 of 1

Question: 23. Referencing the Company's response in GLREADE-1.2a and GLREADE-1.4a about "developing a framework of Operating Parameters for all Large Load customers"

d. Has the Company required any of its existing industrial-class customers to operate within load ramp up/down requirements?

Answer: DTE Electric has not required its existing industrial class customers to comply with customer-specific load ramp up/down requirements comparable to the Operating Parameters being developed for new large load customers. DTE Electric does, however, provide inrush limits to primary service and industrial class customers.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.23di

Respondent: M. Witkowski

Page: 1 of 1

Question: 23. Referencing the Company's response in GLREADE-1.2a and GLREADE-1.4a about "developing a framework of Operating Parameters for all Large Load customers"

d. Has the Company required any of its existing industrial-class customers to operate within load ramp up/down requirements?

i. If yes are those requirements included in a Company tariff?

Answer: Not applicable.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.23dii

Respondent: M. Witkowski

Page: 1 of 1

Question: 23. Referencing the Company's response in GLREADE-1.2a and GLREADE-1.4a about "developing a framework of Operating Parameters for all Large Load customers"

d. Has the Company required any of its existing industrial-class customers to operate within load ramp up/down requirements?

ii. If yes, how were those requirements communicated to the customer?

Answer: Not applicable.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.23diii

Respondent: M. Witkowski

Page: 1 of 1

Question: 23. Referencing the Company's response in GLREADE-1.2a and GLREADE-1.4a about "developing a framework of Operating Parameters for all Large Load customers"

d. Has the Company required any of its existing industrial-class customers to operate within load ramp up/down requirements?

iii. If yes, please provide a sample copy of those requirements for one customer, with any information identifying the customer redacted.

Answer: Not applicable.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.24a

Respondent: M. Witkowski

Page: 1 of 1

Question: 24. In DTEE response GLREADE-1.4a, the Company indicated that these operating parameters may be site specific.

a. Will the UPS ride-through parameters be site specific?

Answer: DTE Electric objects to the phrase “UPS ride-through parameters” to the extent it assumes that the Company prescribes the use of UPS equipment or another particular technology to satisfy applicable ride-through requirements. Subject to and without waiving the foregoing objection, the voltage and frequency ride-through requirements applicable to a large load customer may be site-specific. Those requirements will be informed by applicable reliability requirements and the results of site-specific technical studies conducted by DTE Electric in coordination with ITC. The customer is responsible for determining how its facility and equipment will satisfy the applicable ride-through requirements.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.24ai

Respondent: M. Witkowski

Page: 1 of 1

Question: 24. In DTEE response GLREADE-1.4a, the Company indicated that these operating parameters may be site specific.

a. Will the UPS ride-through parameters be site specific?

i. If yes, why will the UPS ride-through parameters be site specific?

Answer: DTE Electric objects to the phrase “UPS ride-through parameters” to the extent it assumes that the Company prescribes the use of UPS equipment or another particular technology to satisfy applicable ride-through requirements. Subject to and without waiving the foregoing objection, see the Company response to GLREADE-2.24a. Site-specific studies are important to validate the impact of load loss at a specific site on the electric system. Therefore, it is possible that ride-through requirements may be site-specific versus always following a single ride-through curve.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.24b

Respondent: M. Witkowski

Page: 1 of 1

Question: 24. In DTEE response GLREADE-1.4a, the Company indicated that these operating parameters may be site specific.

b. Will the permissible ramp rates for load up/down during start and stop of compute models and ramp rate limitations for load oscillations be site specific?

Answer: Ramp rates for start/stop or oscillations may be site-specific based on technical studies of a specific site and customer load.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.24bi

Respondent: M. Witkowski

Page: 1 of 1

Question: 24. In DTEE response GLREADE-1.4a, the Company indicated that these operating parameters may be site specific.

- b. Will the permissible ramp rates for load up/down during start and stop of compute models and ramp rate limitations for load oscillations be site specific?
- i. If yes, why will they be site specific?

Answer: The Company will follow applicable MISO reliability requirements for ramp rate when they are finalized; however, site-specific studies may require tighter limits.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.24c

Respondent: M. Witkowski

Page: 1 of 1

Question: 24. In DTEE response GLREADE-1.4a, the Company indicated that these operating parameters may be site specific.

c. Does making the operating parameters site specific discriminate against certain customers, by making them adhere to more restrictive operating parameters than some other customers?

Answer: DTE Electric objects to the characterization that site-specific Operating Parameters “discriminate” against certain customers because that characterization is argumentative and assumes that differences in technical requirements arising from different facility and electric-system conditions constitute improper or unreasonable discrimination. Subject to and without waiving the foregoing objections, no. DTE Electric applies a consistent technical-study process to prospective large load customers. The customer-specific Operating Parameters resulting from that process may differ based on relevant engineering considerations, including the customer’s facility design, load characteristics, point of interconnection, system topology, local electric-system conditions, applicable reliability requirements, and technical-study results. Differences in Operating Parameters that are supported by those considerations establish the requirements reasonably necessary to provide reliable service at each location and do not constitute improper discrimination. Where technically feasible, system upgrades may be evaluated as an alternative or supplement to operational limitations, subject to the applicable service arrangements and cost responsibilities.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.25a

Respondent: M. Witkowski

Page: 1 of 1

Question: 25. In DTEE response GLREADE-1.3a, the Company noted “that its two executed agreements with large load customers include specific operating parameters.”

a. Regarding the Saline data center, for which special contracts were approved by the MPSC in U-21990: have specific UPS ride-through requirements for that site been finalized and communicated to the customer?

Answer: DTE Electric objects to this request to the extent it seeks customer-specific information concerning the implementation of the individually negotiated special contracts approved in Case No. U-21990. Those contracts were reviewed and approved in a separate proceeding and are not governed by the prospective Large Load Provision at issue in this proceeding. The reasonableness of the generally applicable Large Load Provision does not depend on the particular monitoring equipment selected for an individual customer served under separately approved special contracts. DTE Electric further objects to the phrase “UPS ride-through requirements” to the extent it assumes that the Company prescribes the use of UPS equipment or another particular technology to satisfy applicable ride-through requirements. Subject to and without waiving the foregoing objection, the Company is actively working with ITC and the customer from U-21990 to finalize the ride-through requirements. Preliminary ride-through curves, subject to revision, were communicated in January 2026.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.25ai

Respondent: M. Witkowski

Page: 1 of 1

Question: 25. In DTEE response GLREADE-1.3a, the Company noted “that its two executed agreements with large load customers include specific operating parameters.”

a. Regarding the Saline data center, for which special contracts were approved by the MPSC in U-21990: have specific UPS ride-through requirements for that site been finalized and communicated to the customer?

i. If yes, please provide a document of those UPS ride-through operating requirements.

Answer: DTE Electric objects to this request to the extent it seeks customer-specific information concerning the implementation of the individually negotiated special contracts approved in Case No. U-21990. Those contracts were reviewed and approved in a separate proceeding and are not governed by the prospective Large Load Provision at issue in this proceeding. The reasonableness of the generally applicable Large Load Provision does not depend on the particular monitoring equipment selected for an individual customer served under separately approved special contracts. DTE Electric further objects to the phrase “UPS ride-through requirements” to the extent it assumes that the Company prescribes the use of UPS equipment or another particular technology to satisfy applicable ride-through requirements. The Company further objects because the preliminary customer-specific materials are confidential, commercially sensitive, or contain sensitive electric system information, including potentially Critical Energy Infrastructure Information. Subject to and without waiving the foregoing objection, not applicable. As explained in GLREADE-2.25a, the final ride-through requirements have not been finalized.

Attachment: *None*

Co-respondent: Legal

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.25aii

Respondent: M. Witkowski

Page: 1 of 1

Question: 25. In DTEE response GLREADE-1.3a, the Company noted “that its two executed agreements with large load customers include specific operating parameters.”

- a. Regarding the Saline data center, for which special contracts were approved by the MPSC in U-21990: have specific UPS ride-through requirements for that site been finalized and communicated to the customer?
- ii. If no, when will these operating parameters be completed?

Answer: DTE Electric objects to this request to the extent it seeks customer-specific information concerning the implementation of the individually negotiated special contracts approved in Case No. U-21990. Those contracts were reviewed and approved in a separate proceeding and are not governed by the prospective Large Load Provision at issue in this proceeding. The reasonableness of the generally applicable Large Load Provision does not depend on the particular monitoring equipment selected for an individual customer served under separately approved special contracts. Subject to and without waiving the foregoing objections, the Company is actively working with ITC and the customer from U-21990 to finalize the Operating Parameters with an expected completion in late October 2026, with the requirement to be finalized prior to initial energization.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.25b

Respondent: M. Witkowski

Page: 1 of 1

Question: 25. In DTEE response GLREADE-1.3a, the Company noted “that its two executed agreements with large load customers include specific operating parameters.”

b. Regarding the Saline data center, for which special contracts were approved by the MPSC in U-21990: have specific load up/down during start and stop of compute models, and ramp rate limitations for load oscillations been finalized and communicated to the customer?

Answer: DTE Electric objects to this request to the extent it seeks customer-specific information concerning the implementation of the individually negotiated special contracts approved in Case No. U-21990. Those contracts were reviewed and approved in a separate proceeding and are not governed by the prospective Large Load Provision at issue in this proceeding. The reasonableness of the generally applicable Large Load Provision does not depend on the particular monitoring equipment selected for an individual customer served under separately approved special contracts. Subject to and without waiving the foregoing objections, the Company is actively working with ITC to finalize the ramp rate limitations for the customer in U-21990. Preliminary limits, subject to change, were communicated with the customer in January 2026.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.25bi

Respondent: M. Witkowski

Page: 1 of 1

Question: 25. In DTEE response GLREADE-1.3a, the Company noted “that its two executed agreements with large load customers include specific operating parameters.”

b. Regarding the Saline data center, for which special contracts were approved by the MPSC in U-21990: have specific load up/down during start and stop of compute models, and ramp rate limitations for load oscillations been finalized and communicated to the customer?

i. If yes, please provide a document of those ramp rate and load oscillation operating parameters.

Answer: DTE Electric objects to this request to the extent it seeks customer-specific information concerning the implementation of the individually negotiated special contracts approved in Case No. U-21990. Those contracts were reviewed and approved in a separate proceeding and are not governed by the prospective Large Load Provision at issue in this proceeding. The reasonableness of the generally applicable Large Load Provision does not depend on the particular monitoring equipment selected for an individual customer served under separately approved special contracts. DTE Electric further objects because the preliminary customer-specific materials are confidential, commercially sensitive, or contain sensitive electric system information, including potentially Critical Energy Infrastructure Information. Subject to and without waiving the objection, not applicable. As explained in the Company’s response to GLREADE-2.25b, the final ramp rate limitations have not yet been finalized.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.25bii

Respondent: M. Witkowski

Page: 1 of 1

Question: 25. In DTEE response GLREADE-1.3a, the Company noted “that its two executed agreements with large load customers include specific operating parameters.”

b. Regarding the Saline data center, for which special contracts were approved by the MPSC in U-21990: have specific load up/down during start and stop of compute models, and ramp rate limitations for load oscillations been finalized and communicated to the customer?

ii. If no, when will these operating parameters be completed?

Answer: DTE Electric objects to this request to the extent it seeks customer-specific information concerning the implementation of the individually negotiated special contracts approved in Case No. U-21990. Those contracts were reviewed and approved in a separate proceeding and are not governed by the prospective Large Load Provision at issue in this proceeding. The reasonableness of the generally applicable Large Load Provision does not depend on the particular monitoring equipment selected for an individual customer served under separately approved special contracts. Subject to and without waiving the foregoing objections, see GLREADE-2.25aii.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.25c

Respondent: M. Witkowski

Page: 1 of 1

Question: 25. In DTEE response GLREADE-1.3a, the Company noted “that its two executed agreements with large load customers include specific operating parameters.”

c. Regarding the Van Buren Twp data center, for which special contracts are under review by the MPSC in U-22058: have specific UPS ride-through requirements for that site been finalized and communicated to the customer?

Answer: DTE Electric objects to this request to the extent it seeks customer-specific information concerning the implementation of the individually negotiated special contracts at issue in Case No. U-22058. Those contracts are being reviewed in a separate proceeding and are not governed by the prospective Large Load Provision at issue in this proceeding. The reasonableness of the generally applicable Large Load Provision does not depend on the status or content of the customer-specific Operating Parameters developed under a particular customer’s separately negotiated contracts. DTE Electric further objects to the phrase “UPS ride-through requirements” to the extent it assumes that the Company prescribes the use of UPS equipment or another particular technology to satisfy applicable ride-through requirements. Subject to and without waiving the foregoing objection, the Company is actively working with ITC and the customer from U-22058 to finalize the ride-through requirements. Preliminary ride-through curves, subject to revision, were communicated in April 2026.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.25ci

Respondent: M. Witkowski

Page: 1 of 1

Question: 25. In DTEE response GLREADE-1.3a, the Company noted “that its two executed agreements with large load customers include specific operating parameters.”

- c. Regarding the Van Buren Twp data center, for which special contracts are under review by the MPSC in U-22058: have specific UPS ride-through requirements for that site been finalized and communicated to the customer?
- i. If yes, please provide a document of those UPS ride-through operating requirements.

Answer: DTE Electric objects to this request to the extent it seeks customer-specific information concerning the implementation of the individually negotiated special contracts at issue in Case No. U-22058. Those contracts are being reviewed in a separate proceeding and are not governed by the prospective Large Load Provision at issue in this proceeding. The reasonableness of the generally applicable Large Load Provision does not depend on the status or content of the customer-specific Operating Parameters developed under a particular customer’s separately negotiated contracts. DTE Electric further objects because the preliminary customer-specific materials are confidential, commercially sensitive, or contain sensitive electric system information, including potentially Critical Energy Infrastructure Information. Subject to and without waiving the foregoing objection, not applicable. As explained in the Company’s response to GLREADE-2.25c, the final ride-through limitations have not yet been finalized.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.25cii

Respondent: M. Witkowski

Page: 1 of 1

Question: 25. In DTEE response GLREADE-1.3a, the Company noted “that its two executed agreements with large load customers include specific operating parameters.”

- c. Regarding the Van Buren Twp data center, for which special contracts are under review by the MPSC in U-22058: have specific UPS ride-through requirements for that site been finalized and communicated to the customer?
- ii. If no, when will these operating parameters be completed?

Answer: DTE Electric objects to this request to the extent it seeks customer-specific information concerning the implementation of the individually negotiated special contracts at issue in Case No. U-22058. Those contracts are being reviewed in a separate proceeding and are not governed by the prospective Large Load Provision at issue in this proceeding. The reasonableness of the generally applicable Large Load Provision does not depend on the status or content of the customer-specific Operating Parameters developed under a particular customer’s separately negotiated contracts. DTE Electric further objects to the phrase “UPS ride-through requirements” to the extent it assumes that the Company prescribes the use of UPS equipment or another particular technology to satisfy applicable ride-through requirements. Subject to and without waiving the foregoing objection, the Company is actively working with ITC and the customer from U-22058 to finalize customer-specific Operating Parameters. Under Section 5.5.3 of the PSA in U-22058, the parties will work together diligently and in good faith to finalize the Operating Procedures on or before December 31, 2026, or such later date as the parties may mutually agree. The applicable Operating Parameters and Operating Procedures must be in place before initial energization.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.25d

Respondent: M. Witkowski

Page: 1 of 1

Question: 25. In DTEE response GLREADE-1.3a, the Company noted “that its two executed agreements with large load customers include specific operating parameters.”

d. Regarding the Van Buren Twp data center, for which special contracts are under review by the MPSC in U-22058: have specific load up/down during start and stop of compute models, and ramp rate limitations for load oscillations been finalized and communicated to the customer?

Answer: DTE Electric objects to this request to the extent it seeks customer-specific information concerning the implementation of the individually negotiated special contracts at issue in Case No. U-22058. Those contracts are being reviewed in a separate proceeding and are not governed by the prospective Large Load Provision at issue in this proceeding. The reasonableness of the generally applicable Large Load Provision does not depend on the status or content of the customer-specific Operating Parameters developed under a particular customer’s separately negotiated contracts. DTE Electric further objects to the extent the request seeks confidential, proprietary, commercially sensitive, or Critical Energy Infrastructure Information concerning the customer’s facility or the electric system. Subject to and without waiving the foregoing objections, the Company is actively working with ITC to finalize the ramp rate limitations for the customer in U-22058. Preliminary ride-through curves, subject to revision, were communicated in April 2026.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.25di

Respondent: M. Witkowski

Page: 1 of 1

Question: 25. In DTEE response GLREADE-1.3a, the Company noted “that its two executed agreements with large load customers include specific operating parameters.”

d. Regarding the Van Buren Twp data center, for which special contracts are under review by the MPSC in U-22058: have specific load up/down during start and stop of compute models, and ramp rate limitations for load oscillations been finalized and communicated to the customer?

i. If yes, please provide a document of those ramp rate and load oscillation operating parameters.

Answer: DTE Electric objects to this request to the extent it seeks customer-specific information concerning the implementation of the individually negotiated special contracts at issue in Case No. U-22058. Those contracts are being reviewed in a separate proceeding and are not governed by the prospective Large Load Provision at issue in this proceeding. The reasonableness of the generally applicable Large Load Provision does not depend on the status or content of the customer-specific Operating Parameters developed under a particular customer’s separately negotiated contracts. DTE Electric further objects because this request seeks preliminary customer-specific materials that are confidential, proprietary, commercially sensitive, or contain sensitive electric system information, including potentially Critical Energy Infrastructure Information. Subject to and without waiving the foregoing objection, not applicable. As explained in the Company’s response to GLREADE-2.25d, the final ramp rate limitations have not yet been finalized.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.25dii

Respondent: M. Witkowski

Page: 1 of 1

Question: 25. In DTEE response GLREADE-1.3a, the Company noted “that its two executed agreements with large load customers include specific operating parameters.”

d. Regarding the Van Buren Twp data center, for which special contracts are under review by the MPSC in U-22058: have specific load up/down during start and stop of compute models, and ramp rate limitations for load oscillations been finalized and communicated to the customer?

ii. If no, when will these operating parameters be completed?

Answer: DTE Electric objects to this request to the extent it seeks customer-specific information concerning the implementation of the individually negotiated special contracts at issue in Case No. U-22058. Those contracts are being reviewed in a separate proceeding and are not governed by the prospective Large Load Provision at issue in this proceeding. The reasonableness of the generally applicable Large Load Provision does not depend on the status or content of the customer-specific Operating Parameters developed under a particular customer’s separately negotiated contracts. Subject to and without waiving the foregoing objection, see the Company’s response to GLREADE-2.25cii.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.26a

Respondent: M. Witkowski

Page: 1 of 1

Question: 26. Regarding the operating parameters of UPS ride-through and load ramp rates up/down: will the Company install, own, and operate power monitoring equipment that will verify each large load customer's compliance with these operating parameters?

a. If yes, please identify the type and make of each piece of monitoring equipment the Company intends to use to monitor the operating parameter compliance of the Saline data center, for which special contracts were approved by the MPSC in U-21990.

Answer: DTE Electric objects to this request to the extent it seeks customer-specific information concerning the implementation of the individually negotiated special contracts approved in Case No. U-21990. Those contracts were reviewed and approved in a separate proceeding and are not governed by the prospective Large Load Provision at issue in this proceeding. The reasonableness of the generally applicable Large Load Provision does not depend on the particular monitoring equipment selected for an individual customer served under separately approved special contracts. DTE Electric further objects to the extent the request seeks detailed information concerning the design, configuration, location, capabilities, settings, or communications architecture of customer-specific electric-system monitoring equipment because such information may be confidential, proprietary, commercially sensitive, or reveal sensitive information concerning the electric system. DTE Electric also objects to the phrase "UPS ride-through" to the extent it assumes that the Company requires the customer to use UPS equipment or another particular technology to satisfy applicable voltage- and frequency-ride-through requirements. Subject to and without waiving the foregoing objections, subject to final engineering design and equipment selection, DTE Electric currently plans to use utility-side power-monitoring equipment to monitor relevant electrical performance associated with the facility served under the special contracts approved in Case No. U-21990. The final equipment selection and configuration remain under development.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.26b

Respondent: M. Witkowski

Page: 1 of 1

Question: 26. Regarding the operating parameters of UPS ride-through and load ramp rates up/down: will the Company install, own, and operate power monitoring equipment that will verify each large load customer's compliance with these operating parameters?

b. If no, how does the Company propose to protect other customers from large load customers that fail to adhere to the Company's operating parameters?

Answer: DTE Electric objects to the phrase "UPS ride-through" to the extent it assumes that the Company requires a customer to use UPS equipment or another particular technology to satisfy applicable voltage and frequency ride-through requirements. DTE Electric further objects to the extent the request assumes that identical monitoring equipment must be installed, owned, and operated by the Company for every large load customer to verify compliance with all customer-specific Operating Parameters. Subject to and without waiving the foregoing objections, the monitoring and verification measures applicable to a large load customer will be determined based on the customer's facility, point of interconnection, technical study results, final engineering design, and customer-specific Operating Parameters. The customer's Operating Parameters will be incorporated into the customer's applicable service arrangements and will establish binding operating requirements. If necessary to protect the safety and reliability of the electric system, DTE Electric may limit or interrupt service when authorized under the customer's service arrangements and applicable requirements.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.27

Respondent: M. Witkowski

Page: 1 of 1

Question: 27. In the Company's discussions with the two contracted large load customers, have the customers expressed concern that operating parameters such as UPS ride-through and ramp rate limitations may impose significant costs on the large load customer?

Answer: DTE Electric objects to this request to the extent it seeks confidential, proprietary, or commercially sensitive communications between DTE Electric and the customers that are the subjects of the individually negotiated special contracts reviewed in Case Nos. U-21990 and U-22058. Those customer-specific contracts were addressed in separate proceedings and are not governed by the prospective Large Load Provision at issue in this proceeding. DTE Electric further objects to the phrase "UPS ride-through" to the extent it assumes that the Company prescribes the use of UPS equipment or another particular technology to satisfy applicable ride-through requirements. Subject to and without waiving the foregoing objections, DTE Electric does not characterize the customers' confidential communications or negotiating positions.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.28a

Respondent: M. Witkowski

Page: 1 of 1

Question: 28. In the Company response CEODE-2.3e, the Company states that “operating parameters are between DTE Electric and the customer...”
a. Since operating parameters are important to the stability of the Company’s system, why have operating parameters not been made public?

Answer: The premise of the question is incorrect. The fact that customer-specific Operating Parameters are not publicly disclosed does not mean they are not subject to review, coordination, or oversight. Customer-specific Operating Parameters are treated as confidential because they may contain sensitive information regarding electric system constraints, contingency performance, protection and control assumptions, operating limitations, customer-facility configurations, mitigation measures, and other information that could constitute Critical Energy Infrastructure Information or disclose commercially sensitive customer information. Public disclosure of such information could present grid-security concerns and reveal proprietary customer information.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.29a

Respondent: M. Witkowski

Page: 1 of 1

Question: 29. Regarding the Company's response COEDE-2.7i: "The customer is expected to provide data and demonstrate capability through... and post-energization validation as applicable."

a. For a large load, computational customer, will you require post-energization validation of UPS ride-through requirements?

Answer: Yes.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.29b

Respondent: M. Witkowski

Page: 1 of 1

Question: 29. Regarding the Company's response COEDE-2.7i: "The customer is expected to provide data and demonstrate capability through... and post-energization validation as applicable."

b. For a large load, computational customer, will you require post-energization validation of load ramp rates up/down?

Answer: The Company will monitor post-energization load ramp up/down rates. If necessary to protect the safety and reliability of the electric system, DTE Electric may limit or interrupt service when authorized under the customer's service arrangements and applicable requirements.

Attachment: *None*

DTE Electric Company
One Energy Plaza, 1635 WCB
Detroit, MI 48226-1279



John A. Janiszewski
(313) 235-7309
john.janiszewski@dteenergy.com

September 11, 2026

Don L. Keskey
Public Law Resource Center PLLC
University Office Place
333 Albert Avenue, Suite 425
East Lansing, MI 48823

RE: In the matter of the Application of **DTE ELECTRIC COMPANY** for approval of
amendments to Rate D11 and related relief
MPSC Case No: U-22061

Dear Mr. Keskey:

Attached for electronic filing in the above captioned matter is DTE Electric Company's Second and Final Partial Response (GLREADE-2.22d) to the Great Lakes Renewable Energy Association's Second Discovery Request. Also attached is the Proof of Service.

Very truly yours,

John A.
Janiszewski

John A. Janiszewski

Digitally signed by John A. Janiszewski
Date: 2026.09.11 11:54:34 -04'00'

JAJ/erb
Attachments

cc: Service List

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-2.22d

Respondent: M. Witkowski

Page: 1 of 1

Question: 22. Referencing the Company's response in GLREADE-1.2c: "the question assumes facts regarding 'large load customers simultaneously tripping off-grid' which has not occurred on DTE Electric's system."

d. Without providing any identification of the customer in question, what is the largest, single-site, single-customer load that DTEE is currently supplying (MW)?

Answer: For 2025 the largest single-site, single-customer load was 98.5MW.

Attachment: *None*

DTE Electric Company
One Energy Plaza, 1635 WCB
Detroit, MI 48226-1279



John A. Janiszewski
(313) 235-7309
john.janiszewski@dteenergy.com

September 9, 2026

Don L. Keskey
Brian W. Coyer
Public Law Resource Center PLLC
University Office Place
333 Albert Avenue, Suite 425
East Lansing, MI 48823

RE: In the matter of the Application of **DTE ELECTRIC COMPANY** for approval of
amendments to Rate D11 and related relief
MPSC Case No: U-22061

Dear Mr. Keskey:

Attached for electronic filing in the above captioned matter is DTE Electric Company's
Response to the Great Lakes Renewable Energy Association's Third Discovery Request. Also
attached is the Proof of Service.

Very truly yours,
John A.
Janiszewski
John A. Janiszewski

Digitally signed by John A.
Janiszewski
Date: 2026.09.09 16:44:54
-04'00'

JAJ/erb
Attachments

cc: Service List

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.30a

Respondent: A. Willis

Page: 1 of 1

Question: 30. With respect to data centers to be subject to the large load tariff, how did (or how will) DTE account for all direct and indirect costs that it incurred in 2025, and separately in 2026, to negotiate contracts, to obtain local or state regulatory approvals, to design and engineer and to acquire facilities and equipment, including but not limited to additions or changes to transmission, distributed facilities and interconnections, sub-stations, or any other expense or investment. Separately classify all such investment and costs, as follows for each year:
a. legal

Answer: The Company does not track actual administrative or other costs to serve "data centers to be subject to the large load tariff" as there was not, and at present there is not, a requirement to do so. Moreover, the Company did not in 2025 and has not in 2026 served any load which may be subject to the large load tariff. To the extent a customer has an approved contract requiring direct payment for certain costs (e.g., storage) the process for accounting for such costs is extensively described in Case No. U-22046.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.30b

Respondent: A. Willis

Page: 1 of 1

Question: 30. With respect to data centers to be subject to the large load tariff, how did (or how will) DTE account for all direct and indirect costs that it incurred in 2025, and separately in 2026, to negotiate contracts, to obtain local or state regulatory approvals, to design and engineer and to acquire facilities and equipment, including but not limited to additions or changes to transmission, distributed facilities and interconnections, sub-stations, or any other expense or investment. Separately classify all such investment and costs, as follows for each year:
b. administrative

Answer: Refer to GLREADE-3.30a.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.30c

Respondent: A. Willis

Page: 1 of 1

Question: 30. With respect to data centers to be subject to the large load tariff, how did (or how will) DTE account for all direct and indirect costs that it incurred in 2025, and separately in 2026, to negotiate contracts, to obtain local or state regulatory approvals, to design and engineer and to acquire facilities and equipment, including but not limited to additions or changes to transmission, distributed facilities and interconnections, sub-stations, or any other expense or investment. Separately classify all such investment and costs, as follows for each year:

c. capitalized costs

Answer: Refer to GLREADE-3.30a.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.30d

Respondent: A. Willis

Page: 1 of 1

Question: 30. With respect to data centers to be subject to the large load tariff, how did (or how will) DTE account for all direct and indirect costs that it incurred in 2025, and separately in 2026, to negotiate contracts, to obtain local or state regulatory approvals, to design and engineer and to acquire facilities and equipment, including but not limited to additions or changes to transmission, distributed facilities and interconnections, sub-stations, or any other expense or investment. Separately classify all such investment and costs, as follows for each year:

d. operation and maintenance

Answer: Refer to GLREADE-3.30a.

Attachment:

None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.30e

Respondent: A. Willis

Page: 1 of 1

Question: 30. With respect to data centers to be subject to the large load tariff, how did (or how will) DTE account for all direct and indirect costs that it incurred in 2025, and separately in 2026, to negotiate contracts, to obtain local or state regulatory approvals, to design and engineer and to acquire facilities and equipment, including but not limited to additions or changes to transmission, distributed facilities and interconnections, sub-stations, or any other expense or investment. Separately classify all such investment and costs, as follows for each year:
e. other expenses

Answer: Refer to GLREADE-3.30a.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.30f

Respondent: A. Willis

Page: 1 of 1

Question: 30. With respect to data centers to be subject to the large load tariff, how did (or how will) DTE account for all direct and indirect costs that it incurred in 2025, and separately in 2026, to negotiate contracts, to obtain local or state regulatory approvals, to design and engineer and to acquire facilities and equipment, including but not limited to additions or changes to transmission, distributed facilities and interconnections, sub-stations, or any other expense or investment. Separately classify all such investment and costs, as follows for each year:

f. depreciation

Answer: Refer to GLREADE-3.30a.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.30g

Respondent: A. Willis

Page: 1 of 1

Question: 30. With respect to data centers to be subject to the large load tariff, how did (or how will) DTE account for all direct and indirect costs that it incurred in 2025, and separately in 2026, to negotiate contracts, to obtain local or state regulatory approvals, to design and engineer and to acquire facilities and equipment, including but not limited to additions or changes to transmission, distributed facilities and interconnections, sub-stations, or any other expense or investment. Separately classify all such investment and costs, as follows for each year:

g. interest costs

Answer: Refer to GLREADE-3.30a.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.30h

Respondent: A. Willis

Page: 1 of 1

Question: 30. With respect to data centers to be subject to the large load tariff, how did (or how will) DTE account for all direct and indirect costs that it incurred in 2025, and separately in 2026, to negotiate contracts, to obtain local or state regulatory approvals, to design and engineer and to acquire facilities and equipment, including but not limited to additions or changes to transmission, distributed facilities and interconnections, sub-stations, or any other expense or investment. Separately classify all such investment and costs, as follows for each year:

h. common equity costs

Answer: Refer to GLREADE-3.30a.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.30i

Respondent: A. Willis

Page: 1 of 1

Question: 30. With respect to data centers to be subject to the large load tariff, how did (or how will) DTE account for all direct and indirect costs that it incurred in 2025, and separately in 2026, to negotiate contracts, to obtain local or state regulatory approvals, to design and engineer and to acquire facilities and equipment, including but not limited to additions or changes to transmission, distributed facilities and interconnections, sub-stations, or any other expense or investment. Separately classify all such investment and costs, as follows for each year:

i. PSCR costs by category (fuel, purchased property, transmission, and other costs)

Answer: Refer to GLREADE-3.30a.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.31a

Respondent: A. Willis

Page: 1 of 1

Question: 31. Detail all of the above capital costs and expenses listed in question 30 with respect to the projected or forecast years, as follows:
a. total 2026

Answer: Refer to GLREADE-3.30a.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.31b

Respondent: A. Willis

Page: 1 of 1

Question: 31. Detail all of the above capital costs and expenses listed in question 30 with respect to the projected or forecast years, as follows:
b. 2027

Answer: The Company has not projected costs related to customers which may be subject to the large load tariff. See also GLREADE-3.30a.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.31c

Respondent: A. Willis

Page: 1 of 1

Question: 31. Detail all of the above capital costs and expenses listed in question 30 with respect to the projected or forecast years, as follows:
c. 2028

Answer: See GLREADE-3.31b.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.32a

Respondent: A. Willis

Page: 1 of 1

Question: 32. What accounting procedures, formulas, and accounts, does DTE utilize to track all direct and indirect costs that are caused by the addition of the data center located in Saline, Michigan, and separately for the data center proposed for Van Buren Township, and for future data centers (if said accounting procedures, formulas, and accounts are different from the Saline and Van Buren data centers)? This explanation should include, but not be limited to, the following:

a. How are direct costs measured, determined, and recorded by account?

Answer: The Company does not track actual administrative or other costs to serve "data centers to be subject to the large load tariff" as there was not, and at present there is not, a requirement to do so. Moreover, the Company did not in 2025 and has not in 2026 served any load which may be subject to the large load tariff. To the extent a customer has an approved contract requiring direct payment for certain costs (e.g., storage) the process for accounting for such costs is extensively described in Case No. U-22046 (please see Company Witness Goyanes' Exhibit A-16 Schedule F1.1 and supporting workpapers).

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.32b

Respondent: A. Willis

Page: 1 of 1

Question: 32. What accounting procedures, formulas, and accounts, does DTE utilize to track all direct and indirect costs that are caused by the addition of the data center located in Saline, Michigan, and separately for the data center proposed for Van Buren Township, and for future data centers (if said accounting procedures, formulas, and accounts are different from the Saline and Van Buren data centers)? This explanation should include, but not be limited to, the following:

b. What allocations are used to determine what portion of costs are allocated as being caused by the data center with respect to each category of costs referenced in question 30.

Answer: As described in GLREADE-3.30a, the Company does not track the various cost types and those cost types had no tracked or actual expense in 2025 or in 2026. Directly assigned capital costs are assessed entirely to the appropriate customer based on the terms of their primary supply agreement and related contracts, as applicable. See also GLREADE-3.32a.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.32c

Respondent: A. Willis

Page: 1 of 1

Question: 32. What accounting procedures, formulas, and accounts, does DTE utilize to track all direct and indirect costs that are caused by the addition of the data center located in Saline, Michigan, and separately for the data center proposed for Van Buren Township, and for future data centers (if said accounting procedures, formulas, and accounts are different from the Saline and Van Buren data centers)? This explanation should include, but not be limited to, the following:

c. With respect to accounting to track costs caused by data centers, have there been, or will there be, any changes in accounting methods, formulas, or cost allocations with respect to and comprising the years 2025, 2026, 2027 and 2028? If so, fully describe and explain each change in accounting methodologies for each year, for all investment and costs detailed in question 30, for each year, and the reasons for each change.

Answer: Refer to GLREADE-3.32b. To the extent “data center in Saline, Michigan” refers to the contracts approved in Case No. U-21900, the Order in that case explains any applicable tracking and reporting requirements. To the extent “data center proposed for Van Buren Township” refers to the contracts proposed in Case No. U-22058, the Commission has not issued an order in that matter and therefore the Company does not know what changes, if any, to “accounting procedures, formulas, and accounts” may or may not be necessary.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.33

Respondent: A. Willis

Page: 1 of 1

Question: 33. DTE's testimony, pages 8, 15-16, and DTE's Exhibit A-1, page 6, presents DTE's proposed administrative fees as follows: \$100,000 for customers with a prospective load of less than 200 MW and \$250,000 for customers with a prospective load greater than or equal to 200 MW. On what basis was this proposed administrative fee determined?

Answer: Refer to the direct testimony of Company Witness Willis (Pgs 15-16). See also AGDE-1.5o.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.34

Respondent: A. Willis

Page: 1 of 1

Question: 34. What types of costs, by category, are intended to be covered by the administrative fee?

Answer: Refer to the direct testimony of Company Witness Willis (Pg 15) which says the administrative fee is intended to account for "...the cost for any required studies and Company resources required to facilitate prospective Company interest in the significant level of service and infrastructure required to serve large load customers".

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.35

Respondent: A. Willis

Page: 1 of 1

Question: 35. Is the administrative fee an annual fee? If not, why not?

Answer: No, it is a one-time fee to cover one-time, non-recurring costs. Refer to GLREADE-3.34.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.36

Respondent: A. Willis

Page: 1 of 1

Question: 36. Is the administrative fee changeable, or can it be increased, if DTE's actual administrative costs exceed DTE's administrative fee as proposed?

Answer: The rebuttal testimony of Company Witness Willis (Pg 28) describes the Company's position that a fixed fee is most appropriate but in the alternative, it is agreeable to setting "the proposed fees as non-refundable with any excess costs being the responsibility of the requesting customer".

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.37

Respondent: A. Willis

Page: 1 of 1

Question: 37. How will DTE account for administrative costs that exceed the administrative fee that DTE proposes?

Answer: Administrative fees not recovered from a specific customer will be recovered through regular ratemaking, unless the alternate option to fully recover any administrative costs exceeding the administrative fee as described in GLREADE-3.36 is approved.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.38a

Respondent: A. Willis

Page: 1 of 1

Question: 38. Will DTE costs associated with administrating data center's interconnections, services, and all data center needs exceed the administrative fee?

a. If so, detail the actual administrative costs that will exceed the fee

Answer: The Company does not know what actual administrative costs might be in the future for an unknown customer, location, or study requirements. As such it cannot detail them.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.38b

Respondent: A. Willis

Page: 1 of 1

Question: 38. Will DTE costs associated with administrating data center's interconnections, services, and all data center needs exceed the administrative fee?

b. Detail the higher administrative costs that may be incurred if (i) DTE has a service outage; (ii) DTE must provide backup power to the data center; (iii) DTE must address demand, voltage, or other variations associated with the data center capacity and energy needs; (iv) any other circumstances.

Answer: DTE Electric objects to this request as unduly vague, ambiguous and calling for speculation associated with future implementation of the Large Load Provision, including potential future costs "associated with administrating data center's interconnections, services, and all data center needs[.]" Subject to and without waiving the foregoing objection, refer to GLREADE-3.38a. In addition, the cost types listed in this question are not "administrative", they are operational costs of running the system and which are incurred to serve all customers.

Moreover, the Company cannot detail forecasted costs associated with "any other circumstances" as this is undefined both in cost type, timing, and otherwise unbounded.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.39a

Respondent: A. Willis

Page: 1 of 1

Question: 39. If DTE's administration costs at any time exceed the amount of the administrative fee charged by DTE to a data center, how will DTE segregate and account for such increased administrative costs not covered by the fee? a. Will DTE assign and account for such excess administrative costs "below the-line" so that said costs are not included in the cost of service for purposes of setting DTE's rates to other ratepayers? If not, why not?

Answer: Refer to GLREADE-3.37.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.39b

Respondent: A. Willis

Page: 1 of 1

Question: 39. If DTE's administration costs at any time exceed the amount of the administrative fee charged by DTE to a data center, how will DTE segregate and account for such increased administrative costs not covered by the fee?
b. Will DTE be reimbursed for said administrative costs from each data center?

Answer: Refer to GLREADE-3.36

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.39bi

Respondent: A. Willis

Page: 1 of 1

Question: 39. If DTE's administration costs at any time exceed the amount of the administrative fee charged by DTE to a data center, how will DTE segregate and account for such increased administrative costs not covered by the fee?
b. Will DTE be reimbursed for said administrative costs from each data center?
i. If not, why not?

Answer: Refer to GLREADE-3.36.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.39bii

Respondent: A. Willis

Page: 1 of 1

Question: 39. If DTE's administration costs at any time exceed the amount of the administrative fee charged by DTE to a data center, how will DTE segregate and account for such increased administrative costs not covered by the fee?
b. Will DTE be reimbursed for said administrative costs from each data center?
ii. If yet [sic], how will this be done, and what tariff or contract provision is or will be applicable to require this?

Answer: Refer to GLREADE-3.36. Administrative fees are detailed in the proposed large load tariff provisions, which would serve as the basis for any requirement to assess administration fees.

Attachment: None

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.39c

Respondent: A. Willis

Page: 1 of 1

Question: 39. If DTE's administration costs at any time exceed the amount of the administrative fee charged by DTE to a data center, how will DTE segregate and account for such increased administrative costs not covered by the fee?
c. Will DTE's shareholders be required to absorb these costs? If not, why not?

Answer: Refer to GLREADE-3.36.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.40a

Respondent: A. Willis

Page: 1 of 1

Question: 40. Can DTE agree to establishing a separate rate case for data centers for purposes of segregating and accounting for all direct and indirect costs attributable to data centers?
a. If not, why not?

Answer: DTE Electric objects to this request to the extent that “establishing a separate rate case for data centers for purposes of segregating and accounting for all direct and indirect costs attributable to data centers” is unduly vague, ambiguous and may call for a legal conclusion. Subject to and without waiving the foregoing objection, the Company does not agree to a “separate rate case for data centers”. Rate cases govern the Company’s revenue requirement, cost allocation, and ratemaking and necessarily require a scope that includes the Company’s overall costs, sales, and rates.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.40b

Respondent: A. Willis

Page: 1 of 1

Question: 40. Can DTE agree to establishing a separate rate case for data centers for purposes of segregating and accounting for all direct and indirect costs attributable to data centers?

b. If yes, please detail the criteria and description of the scope of the rate class applicable to data centers or other entities which will be assigned to this rate class.

Answer: Refer to GLREADE-3.40a.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.41a

Respondent: A. Willis

Page: 1 of 1

Question: 41. Will all data centers be subject to the large load tariff DTE proposes in this case?

a. If not, please explain.

Answer: The Company has proposed, consistent with the Commission's November 2025 Order in Case No. U-21859, an end use neutral large load tariff. The Company's proposal is that new load following the approval of the tariff and which meets the applicability criteria would be subject to the terms of the large load provisions.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.41b

Respondent: A. Willis

Page: 1 of 1

Question: 41. Will all data centers be subject to the large load tariff DTE proposes in this case?

b. If yes, please admit.

Answer: Refer to GLREADE-3.41a.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.42

Respondent: A. Willis

Page: 1 of 1

Question: 42. What eligibility requirements or criteria does DTE propose to be made applicable to data centers or other entities that will be subject to a large load tariff proposed in this case (e.g., what will be the minimum and maximum size limitations, peak demands, loads, operational constraints, etc).

Answer: Please refer generally to the direct testimony and exhibits of Company Witness Willis, and the rebuttal testimony of Company Witnesses Willis and Witkowski. They collectively lay out the Company's proposed requirements, applicability, and details of the proposed large load provision.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.43

Respondent: A. Willis

Page: 1 of 1

Question: 43. Provide any and all studies, analysis, memos, or other documents which were created or utilized by DTE to propose the amount of the administrative fee as proposed by DTE.

Answer: Refer to AGDE-1.5o.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.44

Respondent: A. Willis

Page: 1 of 1

Question: 44. With respect to DTE's proposed administrative fees, what is the basis for the differing fees applicable to the different sizes of the large customer loads?

Answer: Refer to the direct testimony of Company Witness Willis, which says "A customer with a prospective load of more than 100 MW but less than 200 MW would be assessed a fixed fee of \$100,000, and a customer with a prospective load of greater than or equal to 200 MW will be assessed a fixed fee of \$250,000. The 200 MW distinction is based on the additional engineering and study requirements arising at that threshold – service above ~200 MW typically requires a 230 kV or 345 kV connection and additional engineering and design." (Pg 16 Ln 5)

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.45

Respondent: A. Willis

Page: 1 of 1

Question: 45. With respect to each difference identified in answer to question 44, please explain why DTE proposed each difference in its proposed large load tariff compared to the Commission's requirements in U-21859.

Answer: The Company's perspective is that such a distinction in engineering and study burden is extant, and therefore prudent to capture in the tiered administrative fee proposal.

Attachment: *None*

MPSC Case No: U-22061

Requester: GLREA

Question No.: GLREADE-3.46

Respondent: A. Willis

Page: 1 of 1

Question: 46. Detail all differences between the administrative fee provisions determined in Consumers Energy's large load tariff approved by the Commission in U-21859 compared to the administrative fee proposed in this DTE large load tariff case.

Answer: The Company proposed a tiered fee of \$100k for customers less than 200 MW and \$250k for customers greater than or equal to 200 MW, and that it is a fixed fee. The approved tariff in U-21859 includes a \$100k fee that is reconciled to actuals.

Attachment: *None*