



ENVIRONMENTAL LAW & POLICY CENTER

October 6, 2026

Ms. Lisa Felice
Michigan Public Service Commission
7109 W. Saginaw Hwy.
P. O. Box 30221
Lansing, MI 48909

RE: MPSC Case No. U-22061

Dear Ms. Felice:

Please find attached for electronic filing the Initial Brief of the Ecology Center, the Environmental Law & Policy Center, Union of Concerned Scientists, and Vote Solar (collectively, the Clean Energy Organizations or “CEO”). Proof of service is also attached.

Thank you,

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**STATE OF MICHIGAN
MICHIGAN PUBLIC SERVICE COMMISSION**

In the matter of the application of DTE	)	
ELECTRIC COMPANY for approval of	)	
amendments to Rate D11 and related relief.	)	Docket No. U-22061
	)	
	)	
	)	

**INITIAL BRIEF OF THE ECOLOGY CENTER,
THE ENVIRONMENTAL LAW & POLICY CENTER,
UNION OF CONCERNED SCIENTISTS, AND VOTE SOLAR**

October 6, 2026

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The Ecology Center, the Environmental Law & Policy Center, the Union of Concerned Scientists, and Vote Solar (collectively, the Clean Energy Organizations or “CEO”), hereby file their Initial Brief in the above-captioned proceeding involving DTE Electric Company’s (“DTE” or the “Company”) proposed amendments to its Rate Schedule D11.

I. INTRODUCTION

As the risks to grid stability and reliability created by large loads such as hyperscale data centers begin to materialize, regulators across the country at various levels, including this Commission, have recognized the need for additional requirements on these customers in order to maintain a safe, reliable grid for all ratepayers. Yet these requirements largely remain in development, with uncertain approval and implementation timelines. Meanwhile, DTE Electric Company has achieved considerable success in its efforts to attract and serve these types of unprecedented large load customers. The Company has 2.4 gigawatts of Commission-approved new hyperscale data center load coming online in the near future, with more gigawatts in its development pipeline. While reliability requirements are yet to be finalized at both the regional and federal levels, DTE is not waiting to interconnect these new loads to Michigan’s grid. And even once these requirements are in place, they may have hyperscale data center-sized holes, as many current proposals include either exceptions for projects already interconnected or long implementation timelines. The Commission can fill this regulatory gap—and ensure that other Michigan ratepayers are not adversely impacted by outages and grid failures—by imposing reliability requirements on the Company as part of its proposed terms and conditions for serving new large load customers under its Rate D11.

The record in this case, including CEO’s un rebutted evidence regarding the reliability impacts of large load customers, demonstrates that the Company’s proposed Rate D11 provisions

do not adequately mitigate the reliability risks these customers pose to DTE's grid and its other ratepayers. The Commission should correct this by requiring the Company: to formalize its process for evaluating the reliability impacts of these customers; to establish customer-specific operating parameters for each customer prior to interconnection; and to provide additional transparency to the Commission as to how it will implement yet-to-be promulgated regional or federal reliability standards.

II. LEGAL STANDARD

The Commission must set "just and reasonable rates." MCL 460.54; 460.557; 460.6g(2); 460.6v(4)(a)(c). "This can be accomplished only by balancing the interest of public utility investors and the consuming public." *City of Detroit v Pub Serv Comm'n*, 308 Mich 706, 715 (1944). Michigan courts give the Commission wide latitude to implement just and reasonable rates, and this includes the discretion to identify certain issues as important to the specific circumstances of a given case and to elevate certain issues over others. The Commission "may, in the exercise of its discretion, determine what factors are relevant in a particular case." *In re Consumers*, 278 Mich App 547, 563 (2008) (citing *Attorney General v Pub Serv Comm'n*, 231 Mich. App. 76, 79 (1998); *Attorney General v. Public Service Comm'n #1*, 133 Mich App 719, 725-26 (1984)). Further, the Commission is "not bound by any particular ratemaking method and can make pragmatic adjustments in order to respond to particular circumstances of any given case." *Id.*

While rates cannot unlawfully discriminate, it is fully within the Commission's power to approve terms and conditions that apply only to certain classes of customers. "A rate proposal can be lawful and non-discriminatory even though it creates a rate class for which only some customers qualify and even though there are differences in rates among customers within the rate class. Rational differences in classifications and rates can be non-discriminatory, provided appropriate

standards are used to differentiate customers.” *Re Consumers Power Co.*, 161 P.U.R.4th 1, 11 1995 WL 333169 (Mich. P.S.C. May 9, 1995).

The Commission’s broad authority to regulate investor-owned utilities extends to the service quality and reliability of distribution and transmission systems subject to its jurisdiction. *See, e.g.*, MCL 460.10p(6), (7). Further, a utility’s load interconnection process is a retail rate function within the Commission’s jurisdiction, and the Commission can impose requirements on that process.¹

III. LARGE LOAD CUSTOMERS POSE RELIABILITY RISKS THAT ARE NOT CURRENTLY ADDRESSED BY ADEQUATE REGULATORY OVERSIGHT.

A. Large Load Customers’ Unique Risks to Grid Stability and Reliability

Regulators across the country and at every level are faced with addressing the emerging reliability and system stability risks caused by the addition of complex large load facilities, especially computational loads such as data centers. The Large Load Customers² anticipated by the Company’s proposed modifications to its Rate D11 tariff pose unique and novel reliability risks to the electric grid. These risks can and should be mitigated by adequate interconnection processes and requirements.

Specifically, large data centers share a number of characteristics that exacerbate their risk to grid reliability, including size, prevalence, lack of transparency, load characteristics, and sensitivity to grid disturbances. Shaver Direct, 2 TR 283–85; Exhibit CEO-2 at 9; *see also*

¹ The Commission has issued a number of rules relating to interconnection; although, as discussed below, none of these rules addresses large load interconnection specifically. *See, e.g.*, Technical Standards for Electric Service (Michigan Admin Code, R 460.3101 to 3703); Service Quality and Reliability Standards for Electric Distribution Systems (Mich Admin Code, R 460.701 to 752); and the Interconnection and Distributed Generation Standards (Mich Admin Code, R 460.901 to 1026); *see also Tri-State Generation and Transmission Association, Inc.*, 193 FERC ¶ 61,070, at ¶ 50 (2025) (noting that the regulation of the terms and conditions of retail service “is a job for the States alone”).

² The Company proposes that its amendments to Rate D11 be applicable to customers with incremental load exceeding 100 MW (“Large Load Customers”). Willis Direct, 2 TR 28.

Dauphinais Direct, 2 TR 126 (detailing how large data centers “differ fundamentally” from traditional large industrial loads, including “in how much power they draw at a single location, how continuously they operate, and how electricity fits into their overall energy profile”); Richter Direct, 2 TR 191–98 (discussing volatility of data center loads). New large loads that may be served under Rate D11 in the future may exceed historical loads by orders of magnitude—as is the case in DTE’s two special contracts for hyperscale data centers in its territory.³

In addition to their unprecedented size, data centers, and particularly AI facilities, are “unpredictable.” Exhibit CEO-2 at 25; Exhibit CEO-8 at 21. According to the North American Electric Reliability Corporation (“NERC”):

Large loads pose risks in both the planning and operations horizons. Their quick interconnection timelines and large peak demands drive generation and transmission adequacy risks. The fast ramp rates and variability of the loads could exhaust reserves for balancing and contribute voltage and frequency instability.

Exhibit CEO-2 at 45. Data center operators often keep operational and performance details private, and without that data, utilities and grid operators cannot “properly account” for that load’s impact on the rest of the grid. Exhibit CEO-2 at 22.

Data centers are also highly sensitive to fluctuations in voltage and frequency and utilize uninterruptable power supply systems that allow them to disconnect from the grid quickly once they observe a power disturbance. Shaver Direct, 2 TR 283. As CEO witness Shaver explained, “[t]his is a key difference between data centers and other types of loads (even large industrial or commercial loads) that are less sensitive to minor changes in voltage or frequency,” which are a “relatively common” occurrence on the grid. Shaver Direct, 2 TR 283.

³ Case No. U-21990, Order (Dec. 18, 2025); Case No. U-22058, Order (Oct. 1, 2026).

This risk is not simply hypothetical. As one example, in July 2024 approximately 1,500 MW of data center load in Virginia disconnected from the grid within seconds. Exhibit CEO-3 at 1. Grid operators did not order or anticipate this load reduction; rather, the systems of multiple data centers transferred load to backup power systems in response to a minor transmission line fault. As NERC explained, “[t]he electric grid has not historically experienced simultaneous load losses of this magnitude in response to a fault on the system, which has historically been planned for large generation losses but not for such significant simultaneous load losses.” *Id.* CEO witness Shaver described another similar incident (referred to as a customer-initiated load reduction or “CILR”), in which 3 GW of data center load simultaneously disconnected from the grid in Dominion Virginia’s territory in July 2026. Shaver Direct, 2 TR 286. In both cases, while the CILR events did not lead to massive blackouts, they caused significant disturbances to the grid’s voltage and frequency levels in response to otherwise mundane grid events. As NERC observed in the wake of the event, “[s]imultaneous large load losses have two effects on the electric system: First, frequency rises on the system as a result of the imbalance between load and generation; second, voltage rises rapidly because less power is flowing through the system.” Exhibit CEO-3 at 1. In turn, these changes to frequency and voltage on the grid can cause other customers or generators to trip offline.

In sum, “the grid is not capable of responding to the kind of sudden, large changes like those caused by CILR from data centers.” Shaver Direct, 2 TR 284. And other operational characteristics of large data centers can also cause system-wide challenges to the grid. Data centers can ramp quickly, at rates of hundreds of MW per second. *Id.* Grid operators and most generators on the grid physically cannot match those ramp rates. *Id.* The result is that, as witness Shaver explains, “[s]ignificant outages and even rolling blackouts are possible, impacting not just the large

load customer itself but other ratepayers.” *Id.* And because large load customers are often connected to the transmission system, their impacts will “affect a wider area of the grid and simultaneously be harder to isolate.” Shaver Direct, 2 TR 285. “The time and cost (including to other ratepayers) to restore power following outages would also be subsequently larger.” *Id.*

Many of the risks created by computational loads’ unique operating characteristics can be mitigated by technical standards. For example, voltage ride-through requirements can mitigate the risk that large loads disconnect without warning from the grid in response to system disturbances by requiring loads to remain connected during voltage dips and surges. Exhibit CEO-8 at 24. Operational ramp rate limits that define how fast a customer can increase or reduce its load in real-time can prevent excessive and fast ramping of large loads, which can threaten the grid’s ability to maintain adequate voltage and frequency regulation, potentially leading to unplanned outages. Exhibit CEO-5 at 26–27; *see also* Exhibit CEO-2 at 61 (Elevate report recommending that ramp rates be included by utilities as a technical interconnection requirement to set a “consistent baseline for system compatibility”).

B. Status of Regional and Federal Reliability Requirements

Earlier this year, NERC determined that existing utility and grid operator procedures and requirements “are inadequate to address the risks posed by emerging large loads that are forecasted to make up a significant portion of the future grid.” Exhibit CEO-8 at 7. Accordingly, NERC recommended that federal and state regulators “should consider” these gaps and “coordinate with utilities to assess whether incorporating additional interconnection requirements and/or studies are appropriate to reliably support integration of large loads.” Exhibit CEO-8 at 8.

At the same time, the U.S. Federal Regulatory Commission (“FERC”) has determined that neither NERC nor the Midwest Independent System Operator (“MISO”), the grid operator for most

of Michigan and all of DTE’s territory, “are adequately addressing the reliability risks posed by the interconnection of large loads.” Shaver Direct, 2 TR 293. NERC’s reliability standards are still in development, with FERC ordering the filing of the first of several standards by the end of 2026. Shaver Direct, 2 TR 293–94. As for MISO, FERC concluded in a recent order that MISO’s tariff is inadequate because it “lacks provisions addressing ongoing operational requirements for transmission customers taking transmission service on behalf of large loads, including ramp rate or ride-through requirements.”⁴

In late August 2026, MISO filed proposed tariff changes to address these deficiencies, which include definitions of computational loads and large loads, and identifies the need for operational ramp rates, visibility/telemetry, and ride-through requirements.⁵ However, MISO’s specific, yet-to-be-finalized operational requirements will only apply to new loads interconnecting after some future date. Shaver Direct, 2 TR 296. Further, MISO’s proposed tariff provisions themselves do not include actual operational limits for all parameters; rather, MISO anticipates that some of these limits will be developed and ultimately implemented in Businesses Practice Manuals at some point in the future.⁶ In sum, both the substance of MISO’s final operating parameters and the timeline remains uncertain, creating a regulatory gap between the approval of DTE’s Large Load Provision in this proceeding (after which DTE can interconnect new Large Load Customers under Rate D11) and the implementation of MISO’s reliability requirements.

⁴ *Midcontinent Independent System Operator, Inc.*, 195 FERC ¶ 61,212, at P 64 (2026).

⁵ FERC Docket No. ER26-3650, *Midcontinent Independent System Operator, Inc., Interconnection Reliability Requirements for Large Loads*, Transmittal Letter at 1 (filed Aug. 28, 2026) (“MISO IRR Filing”). *See also* 2 TR 272 (judicial notice taken of “the existence of the rulemaking”).

⁶ *See, e.g.*, MISO IRR Filing at 21.

C. DTE's Process for Evaluating New Large Load Customers' Impact on Reliability

In this proceeding, DTE explained how it plans to evaluate prospective Large Load Customers seeking service under Rate D11, describing a “customer- and site-specific study process for assessing the impacts of large load customers on the grid.” Witkowski Rebuttal, 2 TR 92. Specifically,

DTE Electric evaluates reliability impacts through site-specific technical reviews and engineering studies that address power factor, load ramping, oscillations, voltage and frequency ride-through, harmonics, load shedding, telemetry, modeling, and other operating requirements. DTE Electric coordinates with [transmission provider] ITC on studies necessary to evaluate reliable interconnection requirements in accordance with applicable planning criteria established by the transmission network system operators such as ITC and MISO. The results of those studies inform the customer-specific Operating Parameters, which must be completed before initial energization of the customer's facility.

Witkowski Rebuttal, 2 TR 92–93 (hereinafter referred to as the Company's “Operating Parameters Framework”). The Company provided a draft Operating Parameters Framework as an example of the customer-specific Operating Parameters that would result from this study process. Confidential Exhibit CEO-6. According to DTE, the customer-specific operating parameters will include power factor, load ramping, load block oscillations, ride-through, harmonics, under-frequency load shed, manual load shed, and other parameters. Exhibit CEO-5 at 5. At this time, the Company does not have specific, minimum values or requirements for any of the parameters critical for large loads. Shaver Direct, 2 TR 301–02; *see also* Exhibit CEO-5 (DTE discovery responses).

DTE witness Witkowski explained that “[t]he Company's Operating Parameters document will apply to all new large load customer interconnections that request electric service under the Company's Large Load Provision amendments to Rate Schedule D11.” Witkowski Rebuttal, 2 TR 89. However, in a discovery response, the Company confirmed that no “existing tariff provision, regulation, or law independently requires DTE Electric to use” this document or generally its

Operating Parameters Framework prior to interconnecting a Large Load Customer to its system. Exhibit CEO-10 at 1.

IV. THE COMPANY’S LARGE LOAD TARIFF SHOULD INCLUDE REQUIREMENTS TO ADDRESS RELIABILITY RISKS POSED BY LARGE LOAD CUSTOMERS.

The Company does not contest the evidence that new Large Load Customers pose specific and unique risks to the reliability and stability of Michigan’s grid. *See, e.g.*, Witkowski Rebuttal, 2 TR 91 (“The Company recognizes that the Commission may consider whether the proposed tariff reasonably protects the reliability of the system for all customers.”). Rather, the Company asserts that Commission oversight of DTE’s “technical reviews and interconnection process for large load customers” is not necessary, pointing to its Operating Parameters Framework. Witkowski Rebuttal, 2 TR 90. The Company’s position is inconsistent with recent Commission orders relating to large loads and fails to acknowledge the current regulatory gap as neither federal nor regional regulators have finalized reliability requirements. Accordingly, the Commission should require DTE to formalize its process for evaluating the reliability impacts of these customers and to establish customer-specific operating parameters for each customer prior to interconnection, as well as require DTE to implement minimum ramp rate and voltage ride-through requirements. Additionally, the Commission should take the steps proposed by CEO below to ensure that DTE will implement yet-to-be promulgated regional or federal reliability standards, including to already-interconnected Large Load Customers if necessary to maintain the safety and reliability of Michigan’s grid.

A. The Commission Should Close the Regulatory Gap as Regional and Federal Authorities Continue to Work on Reliability Requirements.

Regional and federal reliability requirements remain in development, including by MISO and NERC. While the timelines for enactment of these requirements are becoming clearer, the

implementation timelines and how they will apply to existing or under development large loads are still highly uncertain. The Commission should close this regulatory gap by imposing binding yet flexible requirements as part of DTE's process for Large Load Customers interconnecting under Rate D11. While DTE's Operating Parameters framework could be adequate to ensure Large Load Customers do not adversely impact grid reliability, neither its Operating Parameters framework nor any specific technical requirements are part of its proposed amendments to Rate D11. Exhibit CEO-10 at 1. The Commission should not rely on the Company voluntarily evaluating the reliability risks posed by prospective Large Load Customers. Rather, the Commission should formalize the Operating Parameters framework that DTE discusses in testimony in this proceeding by 1) ordering the Company to update its Operating Parameters document to include minimum ramp rate and voltage ride-through requirements and to file an updated Operating Parameters document with those requirements in this docket; 2) requiring that prior to a Large Load Customer taking service under Rate D11, the Company must implement its Operating Parameters Framework to: (a) evaluate a prospective Large Load Customer's impacts to grid reliability; and (b) establish binding customer-specific operating requirements; and 3) directing the Company to make an *ex parte* filing, prior to each Large Load Customer taking service under Rate D11, that demonstrates compliance with the ramp rate and ride-through requirements listed above.

This approach is consistent with the undisputed evidence in this proceeding that Large Load Customers create distinct and significant risks to the grid's reliability and stability, and with the Commission's recent orders in other large load proceedings. First, in its approval of Consumers Energy's large load tariff, the Commission acknowledged that the "significant increase in load represented by data centers and other large load customers has the potential to lead to risks related

to system reliability.” Case No. U-21859, Order at 103 (Nov. 6, 2025); *see also* Higgins Direct, 2 TR 343. Second, in its approval of Indiana Michigan Power Company’s (“I&M”) large load tariff, the Commission ordered I&M to “update [] the company’s technical interconnection requirements,” adopting the administrative law judge’s recommendation that I&M improve its voltage ride-through requirements and add operational ramp rate limits. Case No. U-21986, Order at 31, 34 (Aug. 27, 2026). Third, in its recent approval of DTE’s special contracts to serve Google’s 1 GW data center, the Commission conditioned the approval of the contracts on DTE’s “adoption of whatever industry-wide standards are eventually approved as a result of the ongoing efforts being made by NERC, FERC, MISO, ITC, and [RTOs] prior to energization of the facility.” Case No. U-22058, Order at 127 (Oct. 1, 2026). While declining to adopt or order specific operating parameters, the Commission acknowledged their importance:

This issue is crucial to the safe and reliable operation of the entire grid and the Commission holds the same concerns as are expressed by [intervenors including CEO] with regard to ramp rate limits, ride-through requirements, and the other operating parameters that are currently under discussion by [federal and regional] agencies.

Id. at 127–28. The Commission further conditioned its approval on DTE’s “commitment to updating the operating parameters applicable to the facility at any time up to *and after* energization where necessary to comply with operational requirements that are imposed by the Commission, NERC, FERC, MISO, or ITC.” *Id.* at 128 (emphasis added).

As the Commission has recognized in these prior orders, minimum technical requirements like ramp rates and voltage ride-through requirements are necessary to mitigate the significant risks to grid reliability and safety posed by Large Load Customers’ size and unique operational characteristics. Voltage ride-through requirements limit data centers’ propensity to disconnect from the grid unexpectedly in response to mundane system disturbances, as occurred in the instances of CILR described above where gigawatts of load dropped off the grid simultaneously.

Shaver Direct, 2 TR 283–84, 288. Similarly, ramp rates preclude data centers from ramping up and down too quickly for the grid to respond. Shaver Direct, 2 TR 288. Both ramp rate and voltage ride-through requirements are critical for ensuring that large loads do not threaten the stability of voltage and frequency on the grid. Accordingly, the Commission should order DTE to update its Operating Parameters document to include minimum ramp rate and voltage ride-through requirements and to file an updated Operating Parameters document with those requirements in this docket. As in the prior cases involving I&M and DTE, this does not require the Commission or stakeholders to develop those specific parameters in this proceeding. Rather, DTE can be responsible for determining those requirements, as part of its “proactive approach to addressing potential reliability risk.” Witkowski Rebuttal, 2 TR 95.

Further, CEO supports DTE’s intention to include customer-specific technical requirements for each new Large Load Customer. As in prior cases involving I&M and DTE, this does not require the Commission or stakeholders to develop those specific parameters in this proceeding. Rather, DTE can be responsible for determining those requirements through the implementation of its Operating Parameters framework as laid out in this proceeding. *See* Witkowski Rebuttal, 2 TR 92–94. However, to ensure DTE follows through in its commitments to properly evaluating and mitigating grid reliability risks, the Commission should require Company to do so as part of its Large Load Customer provisions of Rate D11, and to make an *ex parte* filing, prior to each Large Load Customer taking service under Rate D11, that demonstrates compliance with the reliability requirements included in its Operating Parameters framework, including the updated voltage ride-through and ramp rate requirements as discussed above.

B. The Commission Should Independently Require DTE to Evaluate the Necessity of Applying New Reliability Requirements to Existing Large Load Customers.

As explained by CEO witness Shaver and consistent with MISO's recent reliability filing at FERC, the federal and regional reliability standards currently under development in various forums are unlikely to be explicitly retroactive and therefore are unlikely to apply to large load customers already interconnected at their time of their promulgation. Shaver Direct, 2 TR 296. Across the MISO footprint, this could mean 30 GW or more of large loads that would not be subject to, for example, any final ramp rate or voltage ride-through requirements ultimately decided upon by MISO. *Id.* Relatedly, DTE has informed its investors that it is engaging in discussions with an additional 6 GW of potential data center projects, beyond the 2.4 GW of recently Commission-approved hyperscale data center load. Richter Direct, 2 TR 178; *see also* Dauphinais Direct, 2 TR 125. Depending on the ultimate timelines for MISO operating parameters and NERC standards, it is possible that DTE will seek to interconnect new Large Load Customers under Rate D11 prior to finalization of MISO's requirements.

In discovery, DTE confirmed that it "will apply final and effective NERC, FERC, MISO, or other enforceable requirements in accordance with the specifications contained in those standards." Exhibit CEO-10 at 6. Although DTE stated that it would evaluate those final requirements to "determine whether changes are required or otherwise appropriate, including to [existing] customer-specific Operating Parameters," the Company confirmed that it "does not intend to treat a [new] requirement as directly applicable to an existing, planned, or under construction large load customer if the final requirement excludes that customer through a legacy, grandfathering, or other transition provision." *Id.* MISO's proposed reliability requirements, for

example, include that kind of grandfathering provision. *See* Shaver Direct, 2 TR 296; MISO IRR Filing at 14.

Therefore, in addition to ensuring that DTE properly implements future regional or federal standards (including FERC, NERC, MISO, or ITC requirements), the Commission should be proactive and more protective by ensuring that DTE will evaluate the necessity of applying newly promulgated reliability requirements to its already existing Large Load Customers under Rate D11, even if the standards as written would not apply to those loads. Shaver Direct, 2 TR 308. This would close the regulatory gap that will be caused by Large Loads Customers coming online prior to the promulgation of these federal or regional requirements. For example, it is likely that specific MISO technical operating parameters or NERC requirements will not be finalized until 2027. *See* Shaver Direct, 2 TR 294–96. Accordingly, the Commission should require the Company to file, following the implementation of any NERC and MISO large load reliability standards, sufficient documentation in this docket to demonstrate it is appropriately complying with those requirements, including evaluation of whether any newly promulgated standards should be implemented for existing Rate D11 Large Load Customers.

V. CONCLUSION

For the above reasons, CEO respectfully request that the Commission:

- 1) Requires the Company to: (a) update its Operating Parameters document to establish minimum voltage ride-through and ramp rate requirements and (b) file an updated version of the Operating Parameters document in this docket showing those minimum requirements;
- 2) Requires the Company to, prior to a Large Load Customer taking service under Rate D11, implement its Operating Parameters Framework to: (a) evaluate the prospective

- Large Load Customer's impacts on grid reliability; and (b) establish binding customer-specific operating requirements;
- 3) Directs the Company to make an *ex parte* filing prior to each Large Load Customer taking service under Rate D11 that demonstrates compliance with the minimum voltage ride-through, and ramp rate requirements listed above; and
 - 4) Requires the Company to file, following the implementation of any NERC and MISO large load reliability standards, sufficient documentation in this docket to demonstrate it is appropriately complying with those requirements, including evaluation of whether any newly-promulgated standards should be implemented for existing Rate D11 Large Load Customers.

Respectfully submitted,

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Dated: October 6, 2026

**STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

In the matter of the application of DTE	)	
Electric Company for approval of	)	Case No. U-22061
amendments to Rate D11 and related relief.	)	

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing *Initial Brief on behalf of the Ecology Center, Environmental Law & Policy Center, Union of Concerned Scientists, and Vote Solar* was served by electronic mail upon the following Parties of Record, this Tuesday, October 6, 2026.

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