STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter of the request for a declaratory ruling by the **ANN ARBOR SUSTAINABLE ENERGY UTILITY** regarding application of certain requirements for municipal electric utilities and affirming that it may act as a residential demand response aggregator.	)))))))	Case No. U-22105

At the November 5, 2026 meeting of the Michigan Public Service Commission in Lansing, Michigan.

PRESENT: Hon. Daniel C. Scripps, Chair
Hon. Katherine L. Peretick, Commissioner
Hon. Shaquila Myers, Commissioner

DECLARATORY RULING

On April 15, 2026, Ann Arbor Sustainable Energy Utility (A2SEU) filed a request for a declaratory ruling in this docket pursuant to MCL 24.263 and Mich Admin Code, R 792.10448 (Rule 448) (application). A2SEU seeks a declaratory ruling regarding the application of certain requirements to A2SEU's operations and authorization to act as a residential demand response (DR) aggregator. Application, p. 1. A2SEU states that the application is timely because A2SEU expects to have customers as soon as May 2026. *Id*.

On June 5, 2026, DTE Electric Company (DTE Electric) filed a response to A2SEU's application (DTE Electric's response). On June 25, 2026, A2SEU filed a reply to DTE Electric's response (A2SEU's reply).

The Application, Response, and Reply

A2SEU is located in the City of Ann Arbor (Ann Arbor or the City), Michigan. In the application, A2SEU avers that it is a "supplemental, 100% renewable, municipally-owned utility" and it seeks clarity on whether it is subject to various requirements that apply to municipal utilities. Application, p. 1. A2SEU notes that all of its customers will have a primary utility other than A2SEU, and that the primary utility (for most of its full service customers) is DTE Electric.[1] *Id*. A2SEU seeks a declaratory ruling on whether it is required to take action to comply with reporting and other requirements related to: (1) the Michigan Energy Assistance Program (MEAP), and specifically the low-income energy assistance funding (LIEAF) factor under MCL 460.9t; (2) the renewable portfolio standards (RPS) and the renewable energy plan (REP) and clean energy plan (CEP) filing requirements under MCL 460.1028, MCL 460.1051, and MCL 460.1005(d)(ii); (3) the capacity demonstration requirements under MCL 460.6w; and (4) the energy waste reduction (EWR) standards under MCL 460.1071. Application, pp. 1-16. A2SEU also seeks a declaratory ruling that it may act as a residential DR aggregator despite the prohibition implemented in the March 29, 2016 order in Case No. U-16020 (March 29 order). Application, pp. 16-20.

A2SEU states that it was created in 2025 pursuant to Article VII, Sections 24 and 25 of the Michigan Constitution after Ann Arbor voters voted to amend the City's Charter to authorize its creation by adopting a new chapter in the City's Code of Ordinances (Title II, Chapter 35), which became effective on April 17, 2025. Application, pp. 4-5. A2SEU states that the Ann Arbor Code of Ordinances establishes A2SEU as "an opt-in, fee-based, supplemental, municipally-owned energy utility that provides 100% renewably-sourced electricity, heat, cooling, light, and power, as well as other energy-related services, at participating homes, businesses, and other properties in

[1] Some customers may have an alternative electric supplier.

the city." Application, p. 5 (quoting Ann Arbor Ordinances, § 2:401). A2SEU states that the "rates charged by the A2SEU will be approved by officials elected by the ratepayers and deposited into public coffers" and "must be set for a regulatory purpose, not a revenue-raising purpose, and the fees must be reasonably related to the benefit conferred by the service." Application, p. 5.

A2SEU explains that it intends to offer solar photovoltaic (pv) systems and home battery storage to an enrolled customer behind the meter (BTM) of the primary electric service provider, and the enrolled customer will have an interconnection agreement with the primary electric service provider (who will typically be DTE Electric). A2SEU plans to charge a monthly fee that will not be calculated on a volumetric basis. Thus, A2SEU explains that it is not a provider of last resort but, instead, that duty will remain with the primary utility and A2SEU will supply power to the customer only when the solar pv system is producing power or the storage system is discharging power. *Id*., p. 6. A2SEU states that it has no customers as of the date of its application, but:

> expects to have between 50 and 150 customers in the City's Bryant Neighborhood as part of a pilot solar and storage offering ("Bryant Neighborhood Pilot") before the end of the year, with the first customers receiving service as early as May. It expects to then expand into other parts of the City with solar and solar + storage offerings by late 2026 or in 2027.

Id., pp. 6-7. A2SEU adds that it wishes to participate in the deployment of a virtual power plant (VPP) that is planned as part of the Bryant Neighborhood Pilot, and that it has procured equipment which will allow it to participate and aggregate DR. *Id*., pp. 7-9.

A2SEU maintains that a state agency may issue a declaratory ruling on the request of an interested person and that a governmental subdivision qualifies as an interested person. *See*, MCL 24.263; MCL 24.205(i). A2SEU argues that A2SEU is a municipally owned electric utility, and that the plain language of the statutory sections listed above indicates that each of those

sections is applicable to a municipally owned electric utility. Application, pp. 8-9. A2SEU then addresses each of the statutory schemes.

Beginning with the MEAP program, A2SEU contends that the requirements of MCL 460.9t do not apply to A2SEU because, per MCL 460.9t(15)(b), the MEAP funding factor applies to retail billing meters and A2SEU will not deploy meters but will, instead, only deploy BTM solar and storage. Application, p. 9. A2SEU notes that all A2SEU customers will have a DTE Electric meter and will pay the funding factor on that meter, and that A2SEU will not deploy wires between the customer and a transmission system. A2SEU seeks a declaratory ruling that the requirements of MCL 460.9t do not apply to its operations. Application, p. 10.

Turning to MCL 460.1028 (the REP), A2SEU notes that it is required by municipal law to limit its generation to renewable resources and that it will not have a renewable energy credit (REC) portfolio. A2SEU states that it will not be billing customers based on the metered output of its assets and that the percentage of its energy that is renewable (100%) will never change. A2SEU asserts that requiring it to obtain RECs would likely cause confusion and double-counting, and could "needlessly rais[e] costs and thus discourag[e] customers from opting in to the A2SEU." Application, p. 12. A2SEU seeks a declaratory ruling:

> finding that the A2SEU may comply with the requirements of MCL 460.1028 by submitting to the Commission a sworn declaration from the A2SEU's executive director that includes (1) an attestation that the A2SEU's generation portfolio consists of 100% renewable assets located in the City of Ann Arbor, (2) a description of those assets and a reasonable estimation of the total MWh [megawatt-hours] of energy provided from those assets, and (3) an attestation that 100% of the energy the A2SEU supplies to its customers comes from those renewable assets.

Application, p. 12. On the same grounds, A2SEU seeks the same ruling with respect to the CEP requirements of MCL 460.1051. Application, p. 13.

Turning to the capacity demonstration requirements of MCL 460.6w(8) and (12)(c), A2SEU states that it does not plan to provide retail distribution services and does not plan to seek membership in the Midcontinent Independent System Operator, Inc. (MISO); thus, A2SEU argues, it has no capacity demonstration obligations. A2SEU adds that "[e]very customer to the A2SEU is served primarily by DTE or an alternative electric supplier [(AES)]." Application, p. 13.[2] A2SEU asks that, if the Commission finds that A2SEU has a capacity obligation, then the Commission should also find that compliance may be demonstrated "by providing a sworn declaration of the A2SEU executive director that the utility is meeting all of its obligations through provision of energy solely from A2SEU assets located within the City of Ann Arbor." *Id*., p. 14. A2SEU adds that the Commission "may wish to additionally provide guidance regarding how to avoid double-counting a likely undeterminable amount of capacity if DTE's plan also relies on distributed generation purchases from customers that include a mix of A2SEU and non-A2SEU solar owners in Ann Arbor." *Id*., n. 1.

Turning to the EWR requirements contained in MCL 460.1071, A2SEU reports that the City already offers extensive energy rebates and thus it "seeks clarification from the Commission regarding whether measures funded by the City, and not via a utility charge, may be used to satisfy this requirement." Application, p. 15. A2SEU notes that it expects to be able to meet its EWR obligations with rebate measures that do not duplicate DTE Electric's rebate measures, and that, if necessary, it will report on allocations between the two utilities. *Id*., p. 16.

Turning to the issue of DR aggregation, A2SEU states that it is "in the process of procuring the infrastructure necessary to allow it to operate VPPs" and that the "simplest VPP is essentially

[2] Quotes are verbatim unless indicated otherwise. All references in quotes to "DTE" are to DTE Electric.

aggregated [DR], in which customers remove their demand from the system at certain times by relying on [BTM] batteries." *Id*. A2SEU states that the March 29 order prohibits "Michigan retail electric customers of regulated utilities from bidding [DR] in regional wholesale electric power markets," but A2SEU also points out that the Commission's plenary power to regulate public utilities under MCL 460.1 excludes municipally owned utilities. *Id*. A2SEU argues that it is not clear whether the ban was intended to apply to municipally owned utilities; but, in any case, A2SEU states that it does not seek a ruling on that issue and instead asks that the Commission authorize A2SEU to engage in aggregated DR for residential customers on a different basis.

A2SEU contends that in the December 21, 2022 order in Case Nos. U-20199 *et al.* (December 21 order) the Commission decided to continue the ban on the aggregation of DR for residential customers based on concerns regarding customer protections. *See*, December 21 order, p. 34. A2SEU argues that it is prohibited from setting rates that "are revenue-raising" and thus "has no incentive to use deceptive marketing tactics or even to attempt to exact a profit[.]" Application, p. 18. A2SEU adds that:

> the A2SEU offers some unique possibilities to study the effectiveness of demand response programs. The Bryant Neighborhood Pilot will supply solar and storage to the lowest-income area of Ann Arbor, and some of the first customers are expected to be residences that are providing housing to formerly unhoused persons. As the A2SEU expands, providing solar and storage to many households for which credit requirements or other financial barriers would have prevented their ability to participate, the utility will be able to demonstrate how take-up rates differ if such programs are presented at the initiation of new service, and for income-limited individuals. Additionally, the A2SEU hopes to enroll individuals who are served under low-income rates by their primary utility, thus reducing the overall expenditures for the primary utility of serving such households by lowering the energy purchases under the preferential rate.

Application, pp. 18-19. Based on the argument that there are no consumer protection concerns presented by its request, A2SEU asks that the Commission find that the residential DR aggregation ban does not apply to A2SEU. *Id*., p. 19.

In response to the application, DTE Electric argues that A2SEU need not comply with the listed statutory requirements because A2SEU is not a utility and thus the statutes are inapplicable. DTE Electric's response, p. 1. DTE Electric contends that A2SEU acknowledges that it "does not function as a utility and does not have the governance or infrastructure to do so." *Id*., p. 2. If the Commission finds that the listed statutory requirements apply to A2SEU and grants the requested exemptions, DTE Electric requests that such a ruling "be limited to the A2SEU's current scope of operations." *Id*. DTE Electric further requests that A2SEU be allowed to participate in DR aggregation for the Bryant Neighborhood Pilot, which is DTE Electric's VPP pilot. *Id*.

DTE Electric argues that, though A2SEU is authorized to function as a utility under the City's charter, A2SEU is not currently functioning as a utility and does not plan to do so. DTE Electric points to A2SEU's acknowledgement that its functions are supplementary to the primary supplier and that all of its customers will continue to have a primary supplier. DTE Electric states that, to its knowledge, A2SEU does not own "poles, wires, meters, or electrical connections of any kind between or among retail electric end use customers" and will not be responsible for ensuring resource adequacy. *Id*., p. 3. DTE Electric argues that the regulatory construct in Michigan does not contemplate a supplementary utility and that A2SEU's operations are analogous to a "third-party full service installation company or direct-to-customer equipment manufacturer selling [BTM] solar panels and battery systems[.]" *Id*. DTE Electric avers that if A2SEU is a utility, then such private developers are also utilities. Because it is not a municipal utility, DTE Electric argues, A2SEU does not need the exemptions that it seeks.

If the Commission agrees with A2SEU that it is a municipal utility, DTE Electric contends that the Commission's declaratory ruling should apply only to A2SEU's "installation of unmetered solar generation and battery storage behind existing utility meters." *Id*., p. 4. Due to the potential

for cost shifting, DTE Electric argues that if A2SEU later installs meters, A2SEU customers should be responsible for MEAP and EWR compliance. DTE Electric recommends that:

> A2SEU be required to submit detailed public quarterly reporting on the scope of its operations, including whether it has installed, or intends to install, poles, wires, meters, has created or intends to make electrical connections of any kind between or among retail electric end use customers, engages or intends to engage in virtual distributed generation or wheeling, or otherwise intends to utilize DTE Electric's system beyond those current operations described by the A2SEU.

Id., p. 6. DTE Electric also notes that any ruling from the Commission in this matter will not apply to DTE Electric since a declaratory ruling is binding only on the party requesting it and the agency that issues it. *Id*. (citing MCL 24.263 and the March 13, 2025 order in Case No. U-21619, p. 3).

Finally, DTE Electric states that it supports a narrow exception to the DR aggregation ban for A2SEU in this instance, in order to facilitate the inclusion of A2SEU's Bryant Neighborhood Pilot in a DTE Electric VPP pilot. DTE Electric's response, p. 7. DTE Electric pledges close coordination with A2SEU in order to "mitigate the potential for customer confusion and resource double counting" that could occur with overlapping DR programs. *Id*.

In its reply, A2SEU states that:

> [i]t appears that neither DTE nor the A2SEU would object to a finding by the Commission that so long as the A2SEU does not offer "retail distribution service," the A2SEU falls outside the set of entities that must comply with the requirements of MCL §§ 460.9t, 460.1028, 460.1051(4), 460.6w, and 460.1071. The A2SEU and DTE also agree that DTE, the A2SEU, and the City of Ann Arbor all benefit from regular discussions regarding the A2SEU's operations.

A2SEU's reply, p. 1.

A2SEU contends that DTE Electric offers no discussion of the definition of a utility in its response. A2SEU offers a "non-exhaustive list of the definitions of a utility or a utility system found in different parts of Michigan law" including (according to A2SEU) under the Michigan

Constitution; the self-service power provisions of MCL 460.10a(4); the Electric Transmission Line Certification Act; the Energy Employment Act; the Sales Tax Act; the Property Tax Act; the Unmanned Aircraft Systems Act; and the Small Wireless Communications Facilities Deployment Act. A2SEU's reply, pp. 3-5. A2SEU states that it does not intend to install meters, but adds that some of the inverters it has already installed have revenue-grade metering capabilities. A2SEU argues that the Commission may choose any of the above proffered definitions of "utility" to apply in this case. *Id*., pp. 7-9.

Turning to the issue of DR aggregation, A2SEU notes that DTE Electric supports the participation of A2SEU's Bryant Neighborhood Pilot in a DTE Electric VPP pilot. However, A2SEU argues that it should not be barred from all other participation in DR aggregation beyond the pilot because the Commission has stated its expectation that pilots should include an evaluation of full deployment at scale, which would necessitate a path for A2SEU's future involvement. *Id*., pp. 10-11.

Regarding reporting, A2SEU argues that DTE Electric cited no legal authority for compelling a municipal utility to report to the Commission, but adds that DTE Electric "already has many opportunities to regularly gain insight into the scope of the A2SEU's operations – many informal, some voluntarily agreed to, and one (coordination on issues of utility infrastructure) formally imposed by this Commission." A2SEU's reply, p. 12 (citing the February 19, 2026 order in Case No. U-21860, p. 332). Finally, A2SEU reports that it has "installed several systems" and the City has approved a rate that "will go into effect on July 1, 2026." A2SEU's reply, p. 12.

Discussion

MCL 24.263 provides, in pertinent part, as follows:

> On request of an interested person, an agency may issue a declaratory ruling as to the applicability to an actual state of facts of a statute administered by the agency or of a rule or order of the agency. An agency shall prescribe by rule the form for such a request and procedure for its submission, consideration and disposition. A declaratory ruling is binding on the agency and the person requesting it unless it is altered or set aside by any court. An agency may not retroactively change a declaratory ruling, but nothing in this subsection prevents an agency from prospectively changing a declaratory ruling.

The Commission prescribed the form for such a request in Rule 448, which provides as follows:

> (1) Any person may request a declaratory ruling as to the applicability to an actual state of facts of a statute administered by the commission or of a rule or order of the commission, pursuant to the provisions of sections 33 and 63 of the act, MCL 24.233, MCL 24.263. A request for a declaratory ruling shall contain, or by attached exhibits show, all of the following:
> (a) A complete, accurate, and concise statement of the facts or situation upon which the request is based.
> (b) A concise statement of the issues presented.
> (c) Specific reference to all statutes, rules, and orders to which the request relates.
> (d) An analysis by the person's legal counsel of the issues presented and a proposed conclusion, or the person's analysis of the issues presented and a proposed conclusion.
>
> (2) The commission may require that notice of the request for declaratory ruling be provided and may require a contested case proceeding instead of issuing a declaratory ruling.
>
> (3) The decision to issue a declaratory ruling is within the discretion of the commission.

As Rule 448(3) indicates, whether to issue or decline to issue a declaratory ruling, or whether to order a contested case, is within the discretion of the Commission. *See,* September 26, 2006 order in Case No. U-14702, p. 12; October 11, 2001 order in Case No. U-12979, p. 1. The usefulness of a declaratory ruling is limited by the fact that the ruling is binding only on the party requesting it and the agency issuing it. MCL 24.263.

A2SEU presents a case of first impression, given that it is supplemental to the primary electric provider and does not seek to change any aspect of the franchise held by the primary electric

provider. The Commission finds that the application is appropriate for a declaratory ruling and agrees with A2SEU's contention that it is a municipal utility. The Michigan Constitution expressly provides that a city may "own or operate, within or without its corporate limits, public service facilities for supplying . . . power . . . to the municipality and the inhabitants thereof." Const 1963, art 6, § 24; *see*, *Mich Gas & Electric Co v City of Dowagiac*, 273 Mich 153, 155; 262 NW2d 762 (1935). MCL 117.4f(c) states that a city charter may provide "for the acquirement, ownership, establishment, construction, and operation, either within or outside its corporate limits, of public utilities for supplying water, light, heat, power, and transportation to the city and the city's inhabitants, for domestic, commercial, and municipal purposes[.]"[3] Thus, the Commission finds that A2SEU is a municipal utility formed under the City's charter and ordinances.[4]

As a municipal utility, A2SEU is subject to the reporting and other requirements in the listed statutory schemes. *See*, MCL 460.9t(15)(b); MCL 460.1022 and MCL 460.1005(d)(ii); MCL 460.1051(4)(a) and (c); MCL 460.6w(8); and MCL 460.1073(6). However, a declaratory ruling may apply only to an "actual state of facts." MCL 24.263; Rule 448(1). As explained below, the Commission concludes that the listed statutory schemes do not apply to A2SEU at this time, based on A2SEU's current operations.

Beginning with MEAP, the Commission observes that MCL 460.9t(15)(b) provides that the LIEAF factor is "a nonbypassable surcharge on each retail billing meter payable monthly by every customer receiving a retail distribution service from [a] . . . municipally owned electric utility . . .

[3] The Commission notes that statutory and regulatory prohibitions on the duplication of utility facilities in the same geographic area do not apply to municipally owned public utilities. *See*, MCL 460.501(1); Mich Admin Code, R 460.3411; and *City of Coldwater v Consumers Energy Co*, 500 Mich 158, 174; 895 NW2d 154 (2017).

[4] The Commission rejects DTE Electric's assertion that this finding will render third-party developers into utilities. Third-party developers are not governmental entities.

that does not opt out under subsection (9), regardless of the identity of the customer's electric generation supplier." A2SEU states that it does not provide meters and does not plan to provide meters, nor does it provide retail distribution service at this time. Application, p. 10. As the LIEAF factor is charged on a per meter basis to customers of utilities providing retail distribution service, the Commission finds that the LIEAF factor surcharge is not applicable to A2SEU at this time.[5]

Turning to the REP and CEP filing requirements and the RPS, the Commission notes that, under MCL 460.1028(2), an electric provider's REC portfolio is calculated based on either the number of weather normalized MWh of electricity sold during the previous year to retail customers or the average number of MWh of electricity sold by the electric provider annually during the previous three years. A similar calculation is required for the CEP per MCL 460.1051(4)(a)(ii). Again, because A2SEU indicates that it has no volumetric sales and does not provide meters, the Commission finds that the RPS standards and the REP and CEP filing requirements do not apply to A2SEU at this time.

The Commission also finds that the lack of retail sales and the fact that A2SEU is not the primary electric provider for its customers means that A2SEU does not have an obligation to demonstrate that it owns or has contractual rights to sufficient capacity to meet its capacity obligation, because it has no capacity obligation at this time. *See*, MCL 460.6w(8) and (12)(c).

Turning to the EWR requirements, the Commission notes that MCL 460.1077(1) provides, in pertinent part, that "each year beginning 2026, an electric provider's [EWR] programs under this

[5] The Commission notes that, in the annual LIEAF docket, the Commission confirmed that A2SEU should not charge the LIEAF factor nor fulfill the obligations of an opt-out entity. *See*, April 24, 2025 order in Case No. U-17377, p. 5, n. 5.

subpart shall collectively achieve incremental energy savings equivalent to 1.5% of total retail electricity sales in megawatt hours in the preceding year[.]" Again, because A2SEU provides no meters and has no volumetric retail sales, the Commission finds that the EWR requirements do not currently apply to A2SEU.

The Commission agrees with A2SEU and DTE Electric that A2SEU should be authorized to act as a residential DR aggregator in order to allow A2SEU to participate in a DTE Electric VPP pilot.[6] The Commission further agrees that many of the concerns that led to a restriction on DR aggregation for customers of less than 1 megawatt are absent in the present application. As A2SEU notes, "A2SEU's structure as a municipal utility address[es] the Commission consumer protection concern, [and] also provides a unique ability to limit the administrative burden on DTE of such a demand response program." A2SEU's reply, p. 11. Thus, the Commission grants A2SEU an exemption from the current ban on residential aggregation (implemented most recently in the December 21 order) both for participation in such a pilot as well as to pursue broader opportunities to aggregate the DR capabilities of its customers.

The Commission's findings herein are based on the actual state of facts presented by A2SEU in its application. The findings herein are binding upon the Commission and A2SEU until the facts change; and the Commission notes that, as MCL 24.263 provides, it may prospectively change a declaratory ruling. Thus, the Commission finds that A2SEU should report to the Commission on an annual basis, at a minimum, on the state of its operations. In particular, A2SEU shall report on any changes to its operations such that A2SEU offers the provision of meters, retail distribution service, or volumetric retail sales; or if A2SEU procures or installs wires

[6] The Commission notes that DTE Electric's approved Residential Battery Virtual Power Plant pilot program works with residents of the Veridian at County Farms. *See*, the September 10, 2026 order in Case No. U-21653, pp. 4-10. It does not currently include the Bryant Neighborhood Pilot.

connecting to grid assets. A2SEU shall report on such a change of circumstances within 30 days of the occurrence of the change by making a filing in this docket. A2SEU shall also file an annual report in this docket, with the first annual report due no later than May 1, 2027, and every May 1 thereafter.

THEREFORE, IT IS ORDERED that:

A. Ann Arbor Sustainable Energy Utility's request for a declaratory ruling is granted as described in this order.

B. Ann Arbor Sustainable Energy Utility may engage in the aggregation of residential demand response.

C. Ann Arbor Sustainable Energy Utility shall file an annual report in this docket on May 1, 2027, and annually thereafter, and shall report a change in circumstances within 30 days of the change, as described in this order.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, pursuant to MCL 462.26. To comply with the Michigan Rules of Court's requirement to notify the Commission of an appeal, appellants shall send required notices to both the Commission's Executive Secretary and to the Commission's Legal Counsel. Electronic notifications should be sent to the Executive Secretary at LARA-MPSC-Edockets@michigan.gov and to the Michigan Department of Attorney General - Public Service Division at sheac1@michigan.gov. In lieu of electronic submissions, paper copies of such notifications may be sent to the Executive Secretary and the Attorney General - Public Service Division at 7109 W. Saginaw Hwy., Lansing, MI 48917.

MICHIGAN PUBLIC SERVICE COMMISSION

Daniel C. Scripps, Chair

Katherine L. Peretick, Commissioner

Shaquila Myers, Commissioner

By its action of November 5, 2026.

Lisa Felice, Executive Secretary

PROOF OF SERVICE

STATE OF MICHIGAN)

Case No. U-22105

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on November 5, 2026 A.D. she electronically notified the attached list of this **Commission Order via e-mail transmission**, to the persons as shown on the attached service list (Listserv Distribution List).

Brianna Brown

Subscribed and sworn to before me
this 5th day of November 2026.

Angela P. Sanderson
Notary Public, Shiawassee County, Michigan
As acting in Eaton County
My Commission Expires: May 21, 2030

Service List for Case: U-22105

Name	On Behalf Of	Email Address
Ann Arbor Sustainable Energy Utility	Ann Arbor Sustainable Energy Utility	valerie@rivenoaklaw.com
Valerie J.M. Brader	Ann Arbor Sustainable Energy Utility	valerie@rivenoaklaw.com