

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's Own Motion,
ordering **THE DETROIT EDISON COMPANY**
to show cause why its retail rates for the sale and
distribution of electric energy should not be decreased.

Case No. **U-14838**
(e-file/paperless)

**THE MICHIGAN PUBLIC SERVICE COMMISSION STAFF'S
MOTION TO THE COMMISSION TO COMPEL THE DETROIT EDISON COMPANY
TO COMPLY WITH THE COMMISSION'S MARCH 23, 2006 ORDER**

Pursuant to the Rules of Practice and Procedure before the Commission, R 460.17335,
Staff files this Motion to the Commission for their consideration at their next Commission
meeting on June 15, 2006 to Compel the Detroit Edison Company to Comply with the
Commission's March 23, 2006 Order, paragraph F.

On March 23, 2006, the Commission commenced a proceeding and ordered the Detroit
Edison Company to show cause why its retail electric rates should not be reduced. Among other
things, the Commission ordered Detroit Edison to file specific schedules that reconcile the
company's historical data to projected data adjusted for known and measurable changes¹:

The Detroit Edison Company is ordered to file testimony and exhibits regarding
the reasonableness of its rates and to show cause by June 1, 2006 why its rates
should not be reduced and to serve that information on all intervenors in this
proceeding. The Detroit Edison Company shall base its June 1, 2006 filing on
historical data from calendar year 2005, adjusted for known and measurable
changes, to reflect the sales, costs, and financial conditions that are expected to
occur by 2007. As part of its filing The Detroit Edison Company is directed to
provide a schedule that reconciles the company's historical 2005 revenues and
expenses to its projected revenue and expenses clearly showing each known and
measurable change to the historical test year revenue and expenses in a fashion

¹ In the matter, on the Commission's own motion, ordering the Detroit Edison Company to show
cause why its retail rates for the sale and distribution of electric energy should not be decreased,
Order to Show Cause and Notice of Hearing, dated March 23, 2006, page 8, paragraph F.

similar to Attachment B to this order. Further, The Detroit Edison Company is directed to file historical sales and customers billing determinants by rate schedule and to reconcile all known and measurable changes separately by rate schedule for all billing determinants to the historical levels. In addition, pro-forma revenues should be reconciled to the historical revenues.

On June 1, 2006, the Detroit Edison Company filed the testimony and exhibits of 20 witnesses. Mr. Edward L. Falletich filed testimony that purports to comply with the Commission's filing directive in its March 23, 2006 order, paragraph F. Mr. Falletich's 2007 billing determinants were derived using the Corporate Sales Forecasts.² Mr. Falletich's Exhibit DE-13, page 2, does not reconcile the historical revenues to projected test year revenues adjusted for known and measurable changes. Contrary to the Commission's Order, Exhibit DE-13, page 2, merely shows an arithmetic difference between actual 2005 revenues and the projected 2007 revenues. Mr. Falletich's Exhibit DE-13, pages 3-43, do not reconcile the billing 2005 determinants to the 2007 projected billing determinants adjusted for known and measurable changes. Contrary to the Commission's Order, Exhibit DE-13, pages 3-43, merely shows an arithmetic difference between actual 2005 billing determinants and the projected 2007 billing determinants.

Relief Requested

Staff requests that the Commission order the Detroit Edison Company to file on or before Friday, June 23, 2006, a schedule that reconciles the company's actual 2005 revenues to its projected 2007 revenues clearly showing each known and measurable change to the historical test year revenues and to file a schedule that reconciles actual 2005 sales and customer billing determinants by rate schedule to the 2007 projected sales and customer billing determinants by

² Prefiled Direct Testimony, Mr. Falletich, page 23.

rate schedule clearly showing each known and measurable change separately by rate schedule for all billing determinants to the 2005 levels.

In keeping with the Commission's desire to expedite this case, Staff requests the Commission consider Staff's motion at the next Commission meeting on June 15, 2006.

Respectfully submitted,

**MICHIGAN PUBLIC SERVICE COMMISSION
STAFF**

A handwritten signature in black ink that reads "Kristin M. Smith". The script is cursive and fluid.

Kristin M. Smith (P46323)
Patricia S. Barone (P29560)
Assistant Attorneys General
Public Service Division
6545 Mercantile Way, Suite 15
Lansing, MI 48911
Telephone: (517) 241-6680

Dated: June 8, 2006

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NOTICE OF HEARING

TO: Counsel of Record

Please be advised that the Michigan Public Service Commission Staff's Motion to
Compel The Detroit Edison Company to Comply with the Commission's March 23, 2006 Order
will be brought on for a hearing at the Commission's meeting scheduled for June 15, 2006 at
1:30 p.m. or as soon thereafter as counsel may be heard.

Respectfully submitted,

**MICHIGAN PUBLIC SERVICE COMMISSION
STAFF**



Kristin M. Smith (P46323)
Patricia S. Barone (P29560)
Assistant Attorneys General
Public Service Division
6545 Mercantile Way, Suite 15
Lansing, MI 48911
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PROOF OF SERVICE

STATE OF MICHIGAN)
) ss
COUNTY OF INGHAM)

Pamela A. Walters , being first duly sworn, deposes and says that on June 8, 2006, she served a true copy of the MPSC Staff's Motion to the Commission to Compel the Detroit Edison Company to Comply with the Commission's March 23, 2006 Order and Notice of Hearing thereon upon the following parties via e-mail and by depositing the same in a United States postal depository enclosed in an envelope bearing postage fully prepaid, plainly addressed as follows:

Jon P. Christinidis
Detroit Edison Company
2000 Second Avenue, 688 WCB
Detroit, MI 48226

Robert A.W. Strong
Clark Hill PLC
255 S. Old Woodward Avenue, 3rd Floor
Birmingham, MI 48009

Michael L. Kurtz
Kurt J. Boehm
Boehm, Kurtz & Lowry
36 E. Seventh Street, Suite 1510
Cincinnati, OH 42502

Eric J. Schneidewind
Varnum Riddering Schmidt Howlett, LLP
201 N. Washington Square, Suite 810
Lansing, MI 48933

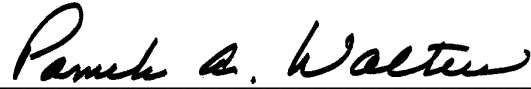
Stewart A. Binke
Dykema Gossett
124 W. Allegan Street, Suite 800
Lansing, MI 48933

John M. Dempsey
Erin J. Stovel
Dickinson Wright, PLLC
215 S. Washington Square, Suite 200
Lansing, MI 48933

Jennifer L. Frye
Dickinson Wright, PLLC
215 S. Washington Square, Suite 200
Lansing, MI 48933

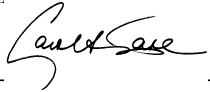
Donald E. Erickson
Assistant Attorney General
7th Floor, Williams Building
P.O. Box 30212
Lansing, MI 48909

Jack M. Abella
Attorney at Law
44818 Pine Drive
Sterling Heights, MI 48313-1261



Pamela A. Walters

Subscribed and sworn to before me
this 8th day of June, 2006.



Carol Ann Dane, Notary Public
State of Michigan, County of Eaton
Acting in the County of Ingham
My Commission Expires: 07/23/2011