

CLARK HILL
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June 8, 2006

VIA ELECTRONIC CASE FILING

Ms. Mary Jo Kunkle
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way
Lansing, Michigan 48909-7721

Re: MPSC Case No. U-14893

Dear Ms. Kunkle:

Enclosed for filing is the Petition to Intervene of the Association of Businesses Advocating Tariff Equity together with a Proof of Service.

Very truly yours,

CLARK HILL PLC
Robert A.W. Strong
Strong
Digitally signed by Robert A.W. Strong
DN: CN = Robert A.W. Strong, C = US, O = Clark Hill
Date: 2006.06.08 14:39:00 -04'00'
Robert A. W. Strong

cc w/enc: ALJ Rigas
Parties of Record
/ag

5274668v.1 07411/058110

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of SEMCO ENERGY)	
GAS COMPANY for authority to redesign and increase its)	Case No. U-14893
r rates for sale and transportation of natural gas in its)	
<u>MPSC Division and other relief.</u>)	

**PETITION TO INTERVENE OF THE
ASSOCIATION OF BUSINESSES ADVOCATING TARIFF EQUITY**

The Association of Businesses Advocating Tariff Equity (“ABATE”), by its attorneys, Clark Hill PLC, hereby petitions the Michigan Public Service Commission (“Commission”) for leave to intervene in and become a party to the above-entitled proceedings, and in connection therewith, represents that the rights and interests of this Petitioner, the grounds of the proposed intervention and Petitioner’s position in the proceedings are as follows:

I.

ABATE is a voluntary association of large industrial businesses which are located in and doing business in the State of Michigan. The purposes of ABATE are to appear before the Commission, the Federal Energy Regulatory Commission (“FERC”) and other regulatory bodies having jurisdiction over public utilities and natural gas pipelines, to advocate the adoption of utility and energy rates, terms and conditions of service and other tariffs or contracts governing utility and energy services which are just and reasonable, nondiscriminatory, nonpreferential, equitable and based on the cost of providing service to each class of utility customer. ABATE supports open access on terms which are fair and where there is true competition. ABATE has been formed for the express purpose of participating in regulatory proceedings to protect the interests of businesses in connection with energy and utility matters. Members of ABATE consume substantial quantities of electricity and natural gas and in Michigan alone their combined gas and electric bills exceed \$1.2

billion annually. As large gas and electric customers, ABATE members are vitally interested in achieving increased economic efficiencies for gas and electric utilities and new electricity sourcing options that allow ABATE members to more effectively compete in the worldwide economy.

II

The current members of ABATE are: Cargill; DaimlerChrysler Corporation; Delphi Corporation; Eaton Corporation; Edward C. Levy Company; Enbridge Energy Limited Partnership; Ford Motor Company; General Motors Corporation;; Marathon Ashland Petroleum, LLC; Martin Marietta Magnesia Specialties, Inc.; Mueller Industries, Inc.; Praxair, Inc.; Quanex Corporation; ThyssenKrupp Budd Company; and U.S. Steel Corporation.

III

ABATE members are directly impacted by these proceedings because the rates approved in these proceedings will be paid by ABATE members.

IV

ABATE submits that its members have a substantial interest in these proceedings because potentially ABATE members may have pay the rate increases which are the subject of SEMCO's Application. ABATE opposes the ratemaking policy changes requested by SEMCO. ABATE should be permitted to intervene in these proceedings and be given the opportunity to cross-examine witnesses, to present witnesses on its behalf, if necessary, and generally to advocate its position with respect to all issues presented as a full party to these proceedings.

WHEREFORE, ABATE requests that the Commission grant ABATE's Petition to Intervene in and be treated as a full party hereto. ABATE further requests that the parties mail copies of all pleadings and correspondence in these proceedings to the offices of its counsel listed below.

Respectfully submitted,

CLARK HILL PLC

**Robert A.W.
Strong**

Digitally signed by Robert A.W.
Strong
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= US, O = Clark Hill
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By:

Robert A.W. Strong (P27724)
Attorneys for the Association of Businesses
Advocating Tariff Equity
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Birmingham, Michigan 48009
248/642-9692
rstrong@clarkhill.com

Dated: June 8, 2006

5274545v.1 07411/058110

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of SEMCO ENERGY)
GAS COMPANY for authority to redesign and increase its)
r rates for sale and transportation of natural gas in its)
MPSC Division and other relief.)

Case No. U-14893

PROOF OF SERVICE

STATE OF MICHIGAN)
)
COUNTY OF OAKLAND)

Robert A.W. Strong, being first duly sworn, deposes and says that he did cause to be filed electronically, the Petition to Intervene of the Association of Businesses Advocating Tariff Equity, and Proof of Service, in the above docket on the persons identified on the attached service list on June 8, 2006.

Robert A.W.
Strong

Digitally signed by Robert A.W. Strong
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US, O = Clark Hill
Date: 2006.06.08 14:39:32 -04'00'

Robert A.W. Strong

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

Audrey L. Gilliatt

Digitally signed by Audrey L. Gilliatt
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ABATE
Date: 2006.06.08 14:39:44 -04'00'

Audrey Gilliatt, Notary Public
Oakland County, MI, acting in Oakland County, MI
My Commission expires: 7/06/06

SERVICE LIST
MPSC Case No. U-14893

Chief Administrative Law Judge

Hon. James N. Rigas
Michigan Public Service Commission
6545 Mercantile Way
Lansing, MI 48909
jnrigas@michigan.gov

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