



Jon P. Christinidis
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July 14, 2006

Kristin M. Smith, Esq.
Michigan Public Service Commission
6545 Mercantile Way, Suite 15
Lansing, MI 48911

**Re: MPSC Case No. U-14528
Detroit Edison's First Discovery Request to MPSC Staff**

Dear Ms. Smith:

Please answer each numbered request separately and completely in writing and under oath, specifically identifying the individual responding. Please repeat each request at the beginning of each answer and indicate the person providing the answer. Should any of the following discovery questions require a response containing confidential, proprietary commercial information belonging to The Detroit Edison Company (or an affiliated company), please respond ONLY by indicating the Detroit Edison discovery response (if any) from which that confidential, proprietary commercial information was obtained, and the nature of the information involved. No discovery question contained herein shall be construed as a waiver of the confidential status of any Detroit Edison (or an affiliated company) documents, material, discovery responses or information of any kind. **Please respond to these requests as soon as reasonably possible prior to the Company's July 19, 2006 Rebuttal filing date.**

These discovery requests are continuing and updates, corrections or omissions should be forwarded via electronic mail, facsimile and/or Federal Express immediately.

DEST 1.1/1. Does Staff agree that *all* parties (without exception) attaching to Detroit Edison's poles, conduits or trenches have an independent obligation and responsibility to design, engineer, construct, attach, operate and maintain their own equipment in conformance with the NESC?

DEST 1.2/2. Does Staff agree that *all* parties (without exception) attaching to Detroit Edison's poles, conduits or trenches have an independent financial obligation and responsibility to pay all costs (either by promptly performing the work themselves or promptly paying Detroit Edison if it performs the work) associated with their own equipment and its design, engineering, construction, attachment, operation and maintenance in conformance with the NESC?

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's Own Motion,)
to commence a contested case proceeding for)
the adoption by The Detroit Edison Company of) Case No. U-14528
a uniform pole attachment tariff for educational)
telecommunications facilities.)

STATE OF MICHIGAN)
) ss.
COUNTY OF WAYNE)

KIMBERLY KRASNODEMSKI, being duly sworn, deposes and says that on the 14th day of July, 2006, she served a copy of The Detroit Edison Company's First Discovery Request to MPSC Staff, along with Proof of Service upon the parties listed on the attached service list by depositing same in the United States mail bearing postage fully prepaid and by electronic mail.

Kimberly A.
Krasnodem
ski

Digitally signed by Kimberly A. Krasnodemski
DN: cn=Kimberly A. Krasnodemski, c=US, o=Detroit Edison and MichCon, ou=Regulatory Affairs, email=krasnodemski@dteenergy.com
Date: 2006.07.14 16:17:40 -04'00'

KIMBERLY KRASNODEMSKI

Subscribed and sworn to before
me this 14th day of July, 2006.

Karyn Beth
Teal

Digitally signed by Karyn Beth Teal
DN: cn=Karyn Beth Teal, c=US, o=DTE Energy, ou=Regulatory Affairs, email=tealk@dteenergy.com
Date: 2006.07.14 16:23:21 -04'00'

Notary Public

MICHIGAN PUBLIC SERVICE COMMISSION

Case No. U-14528

Service List

May 15, 2006

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