STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter of the application of **INDIANA MICHIGAN POWER COMPANY** for reconciliation of its power supply cost recovery plan (Case No. U-21052) for the 12 months ended December 31, 2022.	))))))	Case No. U-21053

At the September 26, 2024 meeting of the Michigan Public Service Commission in Lansing, Michigan.

PRESENT: Hon. Daniel C. Scripps, Chair
Hon. Katherine L. Peretick, Commissioner
Hon. Alessandra R. Carreon, Commissioner

ORDER

History of Proceedings

On March 31, 2023, Indiana Michigan Power Company (I&M) filed an application pursuant to Section 6j of Public Act 304 of 1982 (Act 304), MCL 460.6j, with supporting testimony and exhibits, requesting approval to reconcile revenues collected pursuant to its power supply cost recovery (PSCR) plan for the 12-month period ended December 31, 2022. On May 12, 2023, I&M filed an amended application, which indicated that the company recorded a PSCR underrecovery of $10,832,446. Amended application, p. 3.

Prehearing conferences were held on May 10 and 25, 2023, before Administrative Law Judge Katherine E. Talbot (ALJ Talbot). I&M and the Commission Staff (Staff) participated in the proceedings.

On May 11, 2023, ALJ Talbot issued a protective order for use in this matter.

On January 12, 2024, the case was reassigned to Administrative Law Judge James M. Varchetti (ALJ). On March 7, 2024, the ALJ conducted an evidentiary hearing at which testimony and exhibits were bound into the record and cross-examination was waived. On April 5, 2024, the parties filed initial briefs and on May 3, 2024, the parties filed reply briefs.

On June 3, 2024, the ALJ issued a Proposal for Decision (PFD). On June 24, 2024, I&M filed exceptions to the PFD, and on July 8, 2024, the Staff filed replies to the company's exceptions.

The record in this case consists of 301 pages of transcript, with some being marked confidential, and 23 exhibits.

Proposal for Decision

The ALJ provided an overview of the testimony and positions of the parties in this case at pages 2-6 of the PFD, which will not be extensively repeated here. The ALJ further found that there was no dispute on the record regarding "most of the company's operational decisions or expenses such as coal procurement, nuclear fuel, and various other PSCR-related expenses" and recommended that the undisputed PSCR expenses should be approved. PFD, p. 6. The ALJ further concluded that the record reflected three disputed issues requiring resolution, as follows: (1) the appropriate beginning balance for the 2022 reconciliation; (2) a disallowance for costs relating to the company's Intercompany Power Agreement (ICPA) with the Ohio Valley Electric Corporation (OVEC) for I&M's failure to comply with the Commission's Code of Conduct, Mich Admin Code, R 460.10101 *et seq*. (Code of Conduct); and (3) the potential disallowance for I&M's energy waste reduction (EWR) shortfall. PFD, p. 6.

No exceptions were filed regarding the ALJ's recommendation to approve undisputed expenses or the ALJ's summary of the remaining disputed issues.

The Commission finds that the ALJ's recommendation that the company's undisputed PSCR expenses should be approved. Similar to the ALJ, the Commission will further address each disputed item below.

Discussion

1. Beginning Balance and Power Supply Cost Recovery Calculations

The company and the Staff began with different beginning balances for their calculations in this case. As noted by the ALJ, this was reasonable given that the filing occurred prior to the completion of the reconciliation proceeding for 2021. In addition, the Staff noted that the correct short-term interest rate was 2.13% as opposed to the 2.36% utilized by the company. 3 Tr 209. On April 11, 2024, the Commission issued an order in Case No. U-20805 (April 11 order), which directed a beginning balance for the 2022 PSCR reconciliation of $4,386,719.

The ALJ found it was reasonable to adopt "the Commission-directed beginning net underrecovery of $4,386,719 as the beginning balance for this proceeding" and to adopt the "Staff's recommended correction of the short-term interest rate in July of 2022." PFD, p. 7.

No exceptions were filed on this issue.

The Commission finds that the ALJ's conclusion is supported on the record and the beginning balance for this proceeding is a net underrecovery of $4,386,719 with an interest rate of 2.13%. *See*, April 11 order, p. 20; 3 Tr 209.

2. Intercompany Power Agreement with the Ohio Valley Electric Corporation

As noted in the PFD, the ICPA has been at issue in many prior Commission proceedings. In the June 22, 2023 order in Case No. U-21052 (June 22 order), the Commission approved I&M's 2022 PSCR plan, as described in the order. The Commission also issued a Code of Conduct warning under MCL 460.6j(7), stating that "Indiana Michigan Power Company may not be able to

recover its full costs under the Ohio Valley Electric Corporation's Inter-Company Power Agreement without evidence demonstrating good faith efforts by Indiana Michigan Power Company to minimize the costs of the Inter-Company Power Agreement, which may include renegotiation of the contract." June 22 order, p. 24. Specifically in this case, I&M contended that a disallowance is not necessary given its claim that the "ICPA provided a net benefit for customers in 2022" and that "its customers would have paid more for energy and experienced a higher PSCR rate in 2022 absent this agreement." I&M's initial brief, p. 33.

The ALJ found I&M's position unpersuasive stating that:

> [t]he company's argument in this vein overlooks the plain text of Rule 8(4) [Mich Admin Code, R 460.10108(4)] and its purpose of preventing discrimination or favoritism between regulated utilities and their affiliates. Rule 8(4) does not focus on whether an affiliate contract proves to be a net benefit or net detriment to the company in a specific year, but rather, whether compensation under the affiliate contract is aligned with a market price. Accordingly, the company's argument is unavailing because it focuses on a circumstance that is not pertinent to the Code of Conduct.

PFD, pp. 25-26.

I&M takes exception to the ALJ's recommendation on this issue. Specifically, I&M avers that the ALJ dismissed a crucial difference in the facts, claiming that:

> the sale of ICPA energy produced a net benefit to customers compared to the sum of all 2022 charges billed by OVEC. The net benefit demonstrates that the PJM [PJM Interconnection, L.L.C.] market was clearly willing to pay more for the energy I&M procures under the ICPA than what I&M paid OVEC for the energy, capacity, transmission, and PJM fees combined.

I&M's exceptions, p. 2.

In reply, the Staff states that I&M "incorrectly claims that this case is different than all the other Code of Conduct market price cap disallowances because the [ICPA] provided a net benefit to customers, in [that] those total purchases cost less than the market value of the energy sold on PJM." Staff's replies to exceptions, p. 2. Further, the Staff states that "the law does not require

the Commission to consider revenues from power sales in an attempt to offset unreasonable purchases and make them appear reasonable." *Id*.

The Commission finds the ALJ's analysis on this issue to be well-reasoned. Mich Admin Code, R 460.10108(4) (Rule 8(4)) provides, in pertinent part, that "[i]f an affiliate or other entity within the corporate structure provides services or products to a utility . . . compensation is at the lower of market price or 10% over fully allocated embedded cost." As properly stated by the ALJ, analysis under Rule 8(4) is not regarding any net benefit as alleged by the company. The law simply does not require such an analysis. Therefore, the Commission adopts the ALJ's findings and conclusions on this issue.

In addition to the above, the company states objections on the following five sub issues: (1) that the Code of Conduct's market price cap conflicts with Act 304's reasonable and prudent standard, (2) that the Code of Conduct's market price cap does not apply to the ICPA, (3) that the Commission should consider the company's market proxies, (4) that additional adjustments are necessary to ensure a fair comparison between the ICPA and other long-term contracts, and (5) that the Commission should adopt the use of a weighted average to determine the appropriate market price. *See*, I&M's exceptions, pp. 3-14. Each of these will be addressed separately below.

a. Code of Conduct and Act 304

I&M avers that the ALJ failed to address the company's legal arguments relating to inconsistencies between the Code of Conduct's market-price cap and Act 304's reasonable and prudent standard. The company notes that it "relies on its legal arguments as stated in its Initial Brief and Reply Brief and incorporates those arguments in these Exceptions by reference." I&M's exceptions, p. 3 (citing I&M's initial brief, pp. 42-71 and I&M's reply brief, pp. 7-9).

In replies to exceptions, the Staff states that many of the issues raised by the company in exceptions "are well-settled by the Commission" and therefore are not individually addressed. Staff's replies to exceptions, p. 1.

The issue raised here has been previously addressed by both the Commission and the Michigan Court of Appeals. More specifically, the Commission recently held "that the application of the Code of Conduct and the market-price cap to the ICPA in this case is not only well-settled per Commission precedent but now also affirmed in *In re Indiana Michigan Power Co* [*In re Indiana Michigan Power Co*, ___ Mich App ___; ___ NW3d ___ (2024) (Docket No. 365180); lv den 8 NW3d 564 (2024)]." April 11 order, p. 13. The company has not raised any new arguments relating to this issue in the instant case. Therefore, the Commission finds that this issue is well-settled, and the company's exceptions are denied.

b. Code of Conduct Applicability to the Intercompany Power Agreement

In exceptions, I&M states that it has consistently disagreed with the application of the Code of Conduct to the ICPA, in large part because the company claims that the market-price cap intrudes into the Federal Energy Regulatory Commission's (FERC's) "exclusive jurisdiction to determine the reasonableness of wholesale rates." I&M's exceptions, pp. 3-4.

In replies to exceptions, the Staff states that many of the issues raised by the company in exceptions "are well-settled by the Commission" and therefore are not individually addressed. Staff's replies to exceptions, p. 1.

To start, the Commission reiterates its analysis from the February 2, 2023 order in Case No. U-20530 (February 2 order) wherein the Commission stated:

> that the ICPA has never been approved by the Commission, and therefore each time associated costs are submitted, they must be reviewed for reasonableness and prudence. Any associated FERC approval of the ICPA, a previously determined affiliate transaction, does not absolve the utility from complying with the pricing

> provisions of the Code of Conduct. Indeed, as noted by the ALJ, the Commission "is not determining the reasonableness of a FERC-approved rate;" rather, the Commission here is evaluating "the reasonableness and prudence of I&M's decision to purchase from OVEC, an affiliate, as opposed to another source at a lower rate or market price." PFD, p. 47 (quoting May 13 order, p. 21).

February 2 order, p. 12. The Commission further finds that the company's exceptions again overlook the Michigan Court of Appeals' decision in *In re Indiana Michigan Power Co*. The Commission again finds that this issue is well-settled through Commission and court precedent and that the ALJ properly held that the Code of Conduct's market price cap applies to the ICPA. Therefore, the company's exceptions on this issue are denied.

c. Lake Trout and Mayapple Solar Projects as Market Proxies

I&M relied upon the Lake Trout and Mayapple solar projects as benchmarks. The company claimed that "[t]hese two renewable resources provide better benchmarks for the ICPA because they reflect the current market for satisfying the Company's energy and capacity needs going forward." 3 Tr 144. In contrast, the Staff utilized the Michigan Public Power Agency (MPPA) costs for Belle River and Campbell Unit 3 for market price comparison and concluded "that the costs for the ICPA in 2022 are unreasonable due to noncompliance with the Commission's Code of Conduct." 3 Tr 201; *see also*, 3 Tr 198-202 (citing to Case No. U-20805). The company replied to the Staff's comparators arguing that they should be disqualified because they are not located in the PJM market and that with the transition to clean energy "existing coal resources no longer represent the market to which the ICPA can be compared." 3 Tr 145.

The ALJ rejected the Lake Trout and Mayapple solar projects as comparators because "(1) they would not be built or operational for several more years; (2) they were acquired to meet IRP [integrated resource plan] and renewable energy requirements and are significantly different from coalfired OVEC resources; and (3) because they are PPAs [power purchase agreements] that

the company itself negotiated." PFD, p. 27 (citing April 11 order, pp. 6, 13-14). In addition, the ALJ found that Belle River and Campbell Unit 3 were reasonable and appropriate comparators. He concluded that "both contracts involve coal-fired generation analogous to OVEC's generation and both contracts have been used as comparators in previous reconciliation cases involving the ICPA." PFD, p. 27 (citing February 2 order, pp. 8, 11).

In exceptions, I&M avers that the Commission should reject the ALJ's exclusion of the Lake Trout and Mayapple solar projects from the market analysis. Specifically, the company states that "[t]he Commission's determination of the market price cap should necessarily consider what realistic options I&M has to replace the OVEC ICPA in the PJM market in which it operates and the energy policies in place in Michigan." I&M's exceptions, p. 9. I&M further argues that MCL 460.6j requires the Commission to compare the company's generation resources to other available generation resources. The company continues, claiming that "Lake Trout and Mayapple are representative resources that would replace the ICPA under the current market conditions and are more appropriate market comparators than Belle River and Campbell 3" given that they are the only resources on the record in the PJM market. *Id*. (citing 3 Tr 145).

The company argues that the in-service date of the renewable resources is irrelevant to their reliability as market proxies because "[t]he completion date has no relevance to whether the levelized cost of energy ('LCOE') is an adequate comparison to power available in today's market" and that "[w]hether Lake Trout and Mayapple are constructed immediately at the time of its selection or three years after, the price per megawatt[-]hour [MWh] would be the same." I&M's exceptions, p. 10. In the alternative, I&M contends that Lake Trout and Mayapple should at least be considered along with the MPPA agreements utilized by the Staff to "include market conditions for current resource options that are in fact in PJM . . . ." *Id*., p. 11.

Replying to the company's exceptions, the Staff states that Lake Trout and Mayapple should not be considered as benchmarks as "they were not available during the periods in question and are not existing power purchase agreements (PPAs)" and that "[t]he Commission has repeatedly stated that existing PPAs are the best benchmarks for the Code of Conduct comparison." Staff's replies to exceptions, pp. 1-2. Continuing, the Staff avers that Lake Trout and Mayapple are not "alternatives" as I&M argues because they will not come online until 2026 to 2028. The Staff also reiterates the Commission's Aprill 11 order which indicates that there is also a significant difference between solar, such as Lake Trout and Mayapple, and coal-fired resources.

The Commission agrees with the Staff that the Lake Trout and Mayapple solar projects are not appropriate benchmarks in the market analysis regarding the PSCR period ended December 31, 2022. These solar resources will not be online until 2026 to 2028 and, as such, are not appropriate for the timeframe at issue in this proceeding. *See*, April 11 order, p. 6. As such, the Commission adopts the ALJ's findings and recommendations on this issue.

d. Adjustments to Long-Term Contracts

The company proposed that the calculations should account for differences in the contracts. I&M claimed that "any calculation of a proposed disallowance should recognize and quantify the differences in what costs are embedded in the bills under contract and, specifically, whether MPPA incurred costs that, although not included in the billing, would be meaningful when comparing to the cost of the ICPA." 3 Tr 154. The Staff countered that the company's proposal is speculative on this record and that the proposed adjustments should be rejected by the Commission. *See*, Staff's reply brief, p. 6.

The ALJ rejected I&M's proposed adjustments because an adjustment "should not be made if the pertinent information to substantiate the adjustment is unavailable, unverifiable, or speculative." PFD, p. 28.

In exceptions, I&M reiterates its record testimony and claims that "to ensure that the ICPA and MPPA agreements are comparable, a reasonable adjustment for the [rate of] return component must be made." I&M's exceptions, p. 13.

In reply, the Staff reiterates that adjustments proposed by the company "would be purely speculative and unsupported." Staff's replies to exceptions, p 3. The Staff further notes that the record is closed in the instant case and does not support any specific adjustment amount; however, the Staff recommends that adjustments could be reviewed in future proceedings, if the company can provide support on the record in its next reconciliation proceeding.

The Commission agrees with the ALJ and the Staff. The company has not supported its proposal to adjust the MPPA comparators with reliable evidence on this record. Therefore, the Commission adopts the ALJ's determination on this issue. The Commission further notes, however, that the company is not precluded from raising this claim in its next PSCR reconciliation proceeding supported by appropriate and reliable evidence.

e. Weighted Average

I&M argued that if the Commission is to compare the ICPA to other contracts in this analysis, the Commission should utilize a weighted average given the large discrepancies in the amount of energy provided by the comparators. *See*, 3 Tr 153. The Staff responded that "[i]t is reasonable that given such large discrepancies in the amount of energy provided by the units, equal weighting should not be applied to both Campbell 3 and Belle River." Staff's reply brief, p. 8 (citing I&M's initial brief, p. 38).

The ALJ found that while it may not be inappropriate to utilize a weighted average of comparators, in this case, the company failed to provide "any particularly compelling reason to require the use of a weighted average either, aside from the fact that doing so would have a greater impact in this case than it would have had if it was applied in past cases." PFD, p. 28. Relying on prior Commission orders, the ALJ reasoned that "the Commission implicitly used an arithmetic average rather than a weighted average," and, thus, the ALJ recommended that the Commission continue utilizing the arithmetic average "both for the sake of consistency and because it is not inappropriate to do so." *Id*., p. 29. In addition, the ALJ held that:

> it is reasonable to remove the effect of taxation from the ICPA since the MPPA is a tax-exempt entity whereas the company is not; further, the effect of taxation on the ICPA is susceptible to objective calculation and is not speculative. However, this [ALJ] rejects the company's proposed adjustment to add an average return on net position to the cost of the MPPA contracts because it is a speculative adjustment meant to estimate the effect of the MPPA's status as a public power agency rather than an investor-owned utility. Simply put, it is not an appropriate adjustment because it is entirely speculative and is not susceptible to objective calculation.

Id., p. 28.

The company takes exception to the ALJ's determination. Specifically, I&M argues that rejecting the company's proposal of using a weighted average was in error and should not be rejected merely for consistency. *See*, I&M's exceptions, pp. 13-14.

In reply, the Staff states that, although not adopted by the ALJ, it "continues to support the possible use of a weighted average in the comparison calculations" and that the "Staff recommends that the Commission consider adopting a weighted average for OVEC Code of Conduct review if it deems it appropriate given the evidence provided by the Company." Staff's replies to exceptions, p. 4.

The Commission finds that it is reasonable to utilize the weighted average in the comparison calculations as set forth by the company. *See*, 3 Tr 153; *see also*, I&M's initial brief, p. 14.

Therefore, the Commission respectfully declines to adopt the ALJ's determination on this issue, and instead adopts the company's calculation as supported by the Staff. Nevertheless, the Commission adopts the ALJ's findings and recommendations with respect to the effect of taxation and agrees that I&M's proposed adjustment adding an average return on net position to the cost of the MPPA contracts is speculative and should not be adopted based upon this record.

3. Energy Waste Reduction Shortfall

Similar to the arguments set forth in Case No. U-20805, the parties presented varying proposals on how to account for the company's EWR shortfall. *See*, 3 Tr 72-74, 221-223. The ALJ summarized in detail the parties' positions on this issue at pages 30 to 38 of the PFD, which will not be extensively repeated here.

The ALJ found that the Commission provided direction in Case No. U-20805 "because the issue presented is identical, and the parties presented many of the same arguments in that case that are presented in the current one." PFD, p. 30. Further, after summarizing the positions of the parties in the instant case, the ALJ held that, because the Commission has already determined how to treat the EWR shortfall and that there has been no new evidence or change of circumstances warranting a change in methodology in this case, the same approach is appropriate in the instant case to maintain consistency with Commission precedent. Therefore, the ALJ recommended "that the Commission disallow PSCR costs that would have been avoided had I&M met its EWR target in a manner consistent with the Commission's Order in Case No. U-20805." PFD, p. 39. The ALJ also noted that it was unclear whether the values necessary to make the calculation were provided in the instant docket. *See*, *id*., p. 39, n. 144.

I&M takes exception to the ALJ's determination, arguing that the company's "EWR Impact Analysis was appropriate and accurately reflects the costs incurred from [its] 2021 EWR

compliance shortfall," and reiterates its record testimony in support of its position. I&M's exceptions, p. 14. I&M further argues that basing a PSCR disallowance upon EWR performance exceeds the Commission's statutory authority. Specifically, the company states that:

> [w]ith respect to PSCR proceedings, although MCL 460.6j(12) permits the Commission to "consider" issues regarding the "reasonableness and prudence of expenses for which customers were charged if the issue was not considered adequately" at a PSCR plan proceeding, the analysis remains centered on the actions of a utility. MCL 460.6j(12). Review of a utility's actions to achieve savings targets (i.e., review of an EWR Plan) is exclusively reviewed under Act 295 [Public Act 295 of 2008] in EWR proceedings. Indeed, the plain language of Act 295 states "[i]n its order, the commission shall do both of the following: (a) Make a determination of a provider's compliance with energy waste reduction standards." MCL 460.1074(3). Furthermore, in EWR plan proceedings, "the commission shall review each element and consider whether it would reduce the future cost of service for the provider's customers." MCL 460.1073(2). Furthermore, disallowing PSCR Costs is not an available remedy under Act 295 for not achieving EWR savings targets. The penalty for failing to meet or exceed the savings target is forfeiting the ability to earn a financial incentive under Section 75. See MCL 460.1077, MCL 460.1075.

I&M's exceptions, p. 15. Thus, I&M avers that this PSCR proceeding is not the appropriate proceeding to address any EWR shortfall because it is governed by a different statute.

In reply, the Staff requests that the Commission deny the company's exceptions on this issue. *See*, Staff's replies to exceptions, p. 4.

The Commission agrees with the ALJ in following the methodology adopted by the Commission in Case No. U-20805. In that regard, the Commission reiterates that it is reasonable to disallow PSCR costs that would have been avoided had I&M met the savings target in its approved EWR plan. Notwithstanding this, the Commission also finds that I&M's exception is reasonable in that adopting an unspecified disallowance is not appropriate. As such, based on the Commission's calculations, using figures provided by the parties, the Commission clarifies the ALJ's recommendation and concludes that the appropriate disallowance should be set at $315,453 for the EWR shortfall in this proceeding.

More specifically, the Commission adopts the Staff's calculation of the company's EWR savings shortfall of 4,506,473 kilowatt-hours (kWh). 3 Tr 217, Exhibit S-2, Line 1.2; *see also*, PFD, p. 39. Regarding the market value of energy, the Staff set forth the energy cost resulting from the ICPA/OVEC of $67.69 per MWh. Thus, following the determination in Case No. U-20805, had I&M not needed to provide the additional kWh to its customers, it could have reduced its PSCR costs by approximately $0.068 per kWh, or approximately $306,440 for the kWh savings shortfall of 4,506,473 kWh. *See*, Exhibit S-3.2. With respect to capacity, the record reflects a self-supply capacity cost of $0.002 per kWh, thereby reflecting an additional potential reduction in PSCR costs of $9,013. *See*, Exhibit IM-4.

Given the above, the Commission concludes that the record in this case supports a disallowance of $315,453[1] regarding the EWR savings shortfall of 4,506,473 kWh as reasonable and prudent in this case under Act 304. *See*, 2 Tr 109, 176, 209; Staff's initial brief, pp. 13-15; PFD, pp. 83-84.

THEREFORE, IT IS ORDERED that:

A. Indiana Michigan Power Company's application to reconcile its power supply cost recovery plan costs and revenues for the 12-month period ended December 31, 2022, is approved, as modified by this order.

B. Indiana Michigan Power Company's net underrecovery of $8,855,873 inclusive of interest, shall be reflected as the company's 2023 power supply cost recovery reconciliation beginning balance.

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

[1] ($0.068/kWh x 4,506,473 kWh) + ($0.002/kWh x 4,506,473 kWh) = $315,453.

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

Alessandra R. Carreon, Commissioner

By its action of September 26, 2024.

Lisa Felice, Executive Secretary

P R O O F O F S E R V I C E

STATE OF MICHIGAN)

Case No. U-21053

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on September 26, 2024 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 26th day of September 2024.

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

Service List for Case: U-21053

Name	On Behalf Of	Email Address
Anna B. Stirling	MPSC Staff	stirlinga1@michigan.gov
Hannah E. Buzolits	Indiana Michigan Power Company	hbuzolits@dykema.com
Heather M.S. Durian	MPSC Staff	durianh@michigan.gov
Indiana Michigan Power Company (1 of 3)	Indiana Michigan Power Company	ajwilliamson@aep.com
Indiana Michigan Power Company (2 of 3)	Indiana Michigan Power Company	msmckenzie@aep.com
Indiana Michigan Power Company (3 of 3)	Indiana Michigan Power Company	mgobrien@aep.com
James M. Varchetti	ALJs - MPSC	varchettij@michigan.gov
Jason T. Hanselman	Indiana Michigan Power Company	jhanselman@dykema.com
Katherine E. Talbot	ALJs - MPSC	talbotk@michigan.gov
Monica M. Stephens	MPSC Staff	stephensm11@michigan.gov
Olivia R.C.A. Flower	Indiana Michigan Power Company	oflower@dykema.com
Richard J. Aaron	Indiana Michigan Power Company	raaron@dykema.com
Theresa A. Staley	Indiana Michigan Power Company	tastaley@dykema.com