

**IN THE
UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

Panhandle Eastern)	
Pipe Line Company, LP,)	
)	
Petitioner,)	
)	
v.)	Case No. 20-1419
)	
Federal Energy Regulatory Commission,)	
)	
Respondent.)	

**MOTION TO INTERVENE OF THE
MICHIGAN PUBLIC SERVICE COMMISSION**

Pursuant to Rules 15(d) and 27 of the Federal Rules of Appellate Procedure and Rules 15(b) and 27 of the Circuit Rules of the United States Court of Appeals for the District of Columbia Circuit, the Michigan Public Service Commission (“MPSC”) hereby moves to intervene in the above-captioned case. In support of this motion, MPSC states as follows:

1. The above-captioned case involves an October 13, 2020 petition for review submitted by Panhandle Eastern Pipe Line Company, LP of the following two orders of the Federal Energy Regulatory Commission (“FERC”):

- a. *Panhandle Eastern Pipe Line Company, LP*, Docket Nos. RP19-1523-003, RP19-1523-000, RP19-78-005, RP19-78-001, RP19-78-000, RP19-257-007, RP19-257-005, “Order on Rehearing, Clarification, and Motion to Terminate” 171 FERC ¶ 61,244 (June 18, 2020); and

- b. *Panhandle Eastern Pipe Line Company, LP*, Docket Nos. RP19-1523-008, RP19-78-006, RP19-257-010, “Notice of Denial of Rehearing by Operation of Law,” 172 FERC ¶ 62,085 (August 17, 2020).

2. The MPSC is a State Commission as defined in 15 U.S.C. §717a(8), and 18 C.F.R. § 1.101(k), and has a statutory mandate to represent the interests of natural gas and electric consumers throughout Michigan in proceedings before FERC. In furtherance of this mandate the MPSC was an active participant in the FERC proceedings that led to issuance of the challenged orders.

3. Michigan customers receive a substantial percentage of their natural gas requirements from the Petitioner’s pipeline system. Thus the FERC orders on review will directly affect MPSC’s interests and those of Michigan consumers. MPSC, therefore, moves for leave to intervene in this proceeding.

4. MPSC’s interests cannot be adequately represented by any other party.

5. MPSC includes with this filing, pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure and Rule 26.1 of the Circuit Rules of the United States Court of Appeals for the District of Columbia Circuit, a Corporate Disclosure Non-Applicability Statement.

6. MPSC further anticipates that, to the extent it takes a position in this case, it will support the Respondent on certain issues raised in the course of this proceeding.

Respectfully submitted,

MICHIGAN PUBLIC SERVICE
COMMISSION

/s/ David D'Alessandro

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October 29, 2020

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Michigan Public Service Commission*

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**CORPORATE DISCLOSURE STATEMENT OF THE
MICHIGAN PUBLIC SERVICE COMMISSION**

Pursuant to Federal Rule of Appellate Procedure 26.1, and the local rules of this Court, the Michigan Public Service Commission is not required to provide a Corporate Disclosure Statement, because it is a constitutionally-established governmental entity organized under the laws of the state of Michigan. Accordingly, no Corporate Disclosure Statement has been provided.

Respectfully submitted,

MICHIGAN PUBLIC SERVICE
COMMISSION

/s/ David D'Alessandro
David D'Alessandro
Jonathan P. Trotta
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October 29, 2020

*Counsel for the
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CERTIFICATE OF SERVICE

In accordance with Fed. R. App. P. 25(d), Circuit Rule 25(c) and the Court's Administrative Order Regarding Electronic Case Filing, I hereby certify that I have this 29th day of October, 2020, served the foregoing upon the counsel listed in the Service Preference Report via e-mail through the Court's CM/ECF System or via U.S. Mail, as indicated below:

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