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April 22, 2026

Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 West Saginaw Highway
Lansing, MI 48917

RE: In the matter, on the Commission's own motion, to open a docket for certain regulated electric utilities to file transportation electrification plans and for other related matters.
MPSC Case No. U-21538

Dear Ms. Felice:

Please find enclosed for filing DTE Electric Company's Transportation Electrification Plan (TEP) as directed by the Commission in its December 21, 2023 Order in this docket. Also enclosed is a Proof of Service of the TEP on the parties to Case No. U-21860 and parties that submitted Comments in Case No. U-21492.

Very truly yours,

Breanne K. Reitzel
Digitally signed by Breanne K. Reitzel
Date: 2026.04.22 17:10:34 -04'00'

Breanne K. Reitzel

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Encl.

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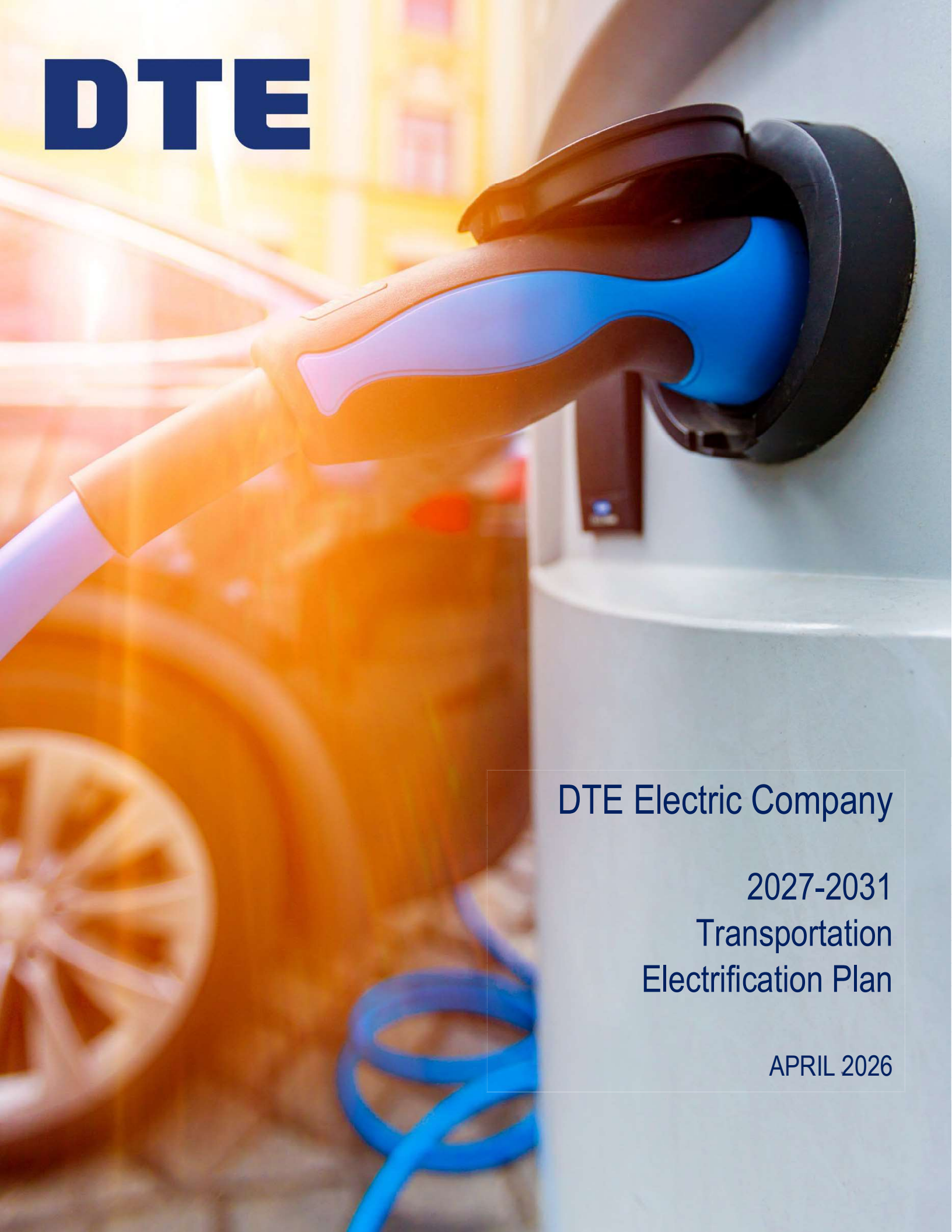


DTE Electric Company

2027-2031 Transportation Electrification Plan

APRIL 2026

Contents

Tables and Figures

Abbreviations

AAATA….. Ann Arbor Area Transportation Authority
ACEEE ..... American Council for an Energy Efficient Economy
ADA…….Americans with Disabilities Act
ADMS…... Advanced Distribution Management System
AFDC…….Alternative Fuels Data Center
AMI…… Advanced Metering Infrastructure
API…… Application Programming Interface
ATE……..Alliance for Transportation Electrification
BCA..... Benefit-Cost Analysis
BEV ..... Battery Electric Vehicle
BIL ..... Bipartisan Infrastructure Law
BYOC ..... Bring Your Own Charger
CAGR..... Compound Annual Growth Rate
CBEG……Clean Bus Energy Grant
CFI…….Charging and Fueling Infrastructure
CFM..... Clean Fuels Michigan
CIAC..... Contribution in Aid of Construction
CMR……..Customer Make-Ready
ComEd ..... Commonwealth Edison
ConEd ..... Consolidated Edison
CSB……...Clean School Bus
DAC..... Disadvantaged Community
DCFC ..... Direct Current Fast Charger
DER……...Distributed Energy Resources
DERMS…. Distribution Energy Management Systems
DSP..... Distribution System Plan
DOE..... Department of Energy
DTE ..... DTE Energy
DTEE..... DTE Electric (or “the Company”)
E&O..... Education & Outreach
EIA…….US Energy Information Administration
EJ……...Environmental Justice
EGLE..... Department of Environment, Great Lakes, and Energy
EIEC……. Equity Investment Eligible Communities
EFA…….Energy Information Administration
ELPC…….Environmental Law Policy Center
EPA…….Environmental Protection Agency
EPRI..... Electric Power Research Institute
EV..... Electric Vehicle
EVSE…….Electric Vehicle Supply Equipment
FPL…….Federal Poverty Level
GM..... General Motors
GWh ..... Gigawatt-hour
IFS…….Integrated Forecasting Solution
IRA ..... Inflation Reduction Act
IRP ..... Integrated Resource Plan
IT ..... Information Technology
KPI.....Key Performance Indicator
kV.....Kilovolt
kW.....Kilowatt
kWh…….Kilowatt-hour
L2……...Level 2
LARA…….Licensing and Regulatory Affairs
LDV…….Light Duty Vehicle
LI.....Low-Income
LMI.....Low- and Moderate-Income
MDOT .....Michigan Department of Transportation
MEIBC .....Michigan Energy Innovation Business Council
MEVA…… Michigan Electric Vehicle Alliance
MHDV ..... Medium- and Heavy-Duty Vehicles
MI…….Moderate-Income
MPSC .....Michigan Public Service Commission
MUD.....Multi-Unit Dwelling
NEVI .....National Electric Vehicle Infrastructure
NPV .....Net Present Value
NRDC……Natural Resource Defense Council
NYSE.....New York Stock Exchange
OBBB……One Big Beautiful Bill
OEM.....Automaker Original Equipment Manufacturer
OFME .....Office of Future Mobility & Electrification
OVGIP .....Open Vehicle-Grid Integration Platform
PHEV……Plug-In Hybrid Vehicles
RFP…….Request for Approval
RMI…….Rocky Mountain Institute
SBAM.....Small Business Association of Michigan
SCE .....Southern California Edison
SEEL…….Solutions for Energy Efficiency Logistics
SFH.....Single-Family Home
SMART…..Suburban Mobility Authority for Regional Transportation
SRP…….Salt River Project
TCO…….Total Cost of Ownership
TE .....Transportation Electrification
TEP .....Transportation Electrification Plan
TOD .....Time of Day
UMR.....Utility Make-Ready
V2G.....Vehicle-to-Grid
V2H.....Vehicle-to-Home
VGIC…….Vehicle-Grid Integration Council
VIO…….Vehicles in Operation
VMT……..Vehicle Miles Traveled
ZEV .....Zero Emission Vehicle

1 Executive Summary

1.1 Strategic Objectives

DTE Electric (DTEE or the Company) remains committed to supporting Michigan's decarbonization goals by reliably integrating new electric vehicles (EVs) onto the grid in a manner grounded in forecasted adoption and system needs. Consistent with this commitment, the Michigan Public Service Commission (MPSC or "Commission") February 2026 Order in Case No. U-21860 approved the second year of the Company's Transportation Electrification Plan (TEP) program execution, providing the foundation for this TEP Refresh.

The Company's EV strategy has evolved significantly since the launch of Charging Forward in 2019, reflecting learnings from EV program execution, continuous benchmarking, expanded stakeholder engagement, and ongoing alignment with Commission guidance, state policy, and regulatory expectations. As directed in Case No. U-20836, DTEE filed its first comprehensive TEP in January 2024 (Case No. U-21538). This 2026 TEP Refresh satisfies the updated TEP filing requirements[1] established in Case No. U-21492, the Commission's January 2025 Order in Case U-21534, and the February 2026 Order in Case U-21860, including scenario planning, forecasting, equity analyses, managed charging integration, coordinated Distribution System Plan (DSP) and Integrated Resource Plan (IRP) alignment, and a refreshed benefit-cost analysis (BCA). The TEP is informed by the MI Healthy Climate Plan[2] and MI Future Mobility Plan[3], as well as the EV Charging and Infrastructure Study prepared by the Michigan Office of Future Mobility & Electrification and the Michigan Department of Labor & Economic Opportunity, and evaluates the impacts of Michigan's EV and charging goals through scenario analysis.

Michigan's transition to transportation electrification presents significant opportunities to strengthen the state's economy by expanding access to locally sourced energy, and sustaining Michigan's leadership in advanced mobility. DTEE's updated market assessment projects EV adoption in Southeast Michigan to grow from approximately 114,000[4] vehicles in 2025 to more

[1] Appendix A, B and C contain consolidated indexes of all MPSC Order requirements and the specific TEP sections and page numbers where each is addressed

[2] MI Healthy Climate Plan available at https://www.michigan.gov/egle/about/organization/climate-and-energy/mi-healthy-climate-plan, April 2022

[3] MI Future Mobility Plan available at state-strategy-for-the-future-of-mobility-and-electrification-detailed-version.pdf, November 2022

[4] Actual 2025 Vehicles In Operation (VIO) was approximately 114,000 (published 2026); the TEP market assessment used a planning assumption of 125,000 EVs based on pre-attrition year-end registrations.

than 423,000 by 2031. To support this growth, approximately 195,000 new chargers will be needed in the DTEE service area between 2027 through 2031, representing approximately $2 billion in combined customer, utility, and public-sector infrastructure investment. DTEE proposes to support approximately 40,000 chargers through targeted rebates and make-ready investments. Under the forecast scenarios evaluated, incremental EV adoption is expected to provide material long-term affordability benefits for customers in the form of downward rate pressure.

As outlined in Sections 2.4 and 2.5.1, DTEE's updated EV adoption outlook reflects recent federal policy changes that affect near-term EV affordability. The strategic objectives of this TEP Refresh are informed by these updated market conditions and focus on aligning proposed investments with forecasted adoption.

Consistent with Commission direction to incorporate lessons learned and best practices, DTEE completed a comprehensive benchmarking effort reviewing eight peer utility TEPs and a national survey[5] of 13 utilities through the Alliance for Transportation Electrification (ATE). Insights from this review informed refinements to the TEP Refresh portfolio, including expanded eligibility criteria for residential incentives, enhanced support for multifamily properties, strengthened equity-driven program design, updated public charging strategies, and revised fleet charging investments.

The proposed TEP portfolio is grounded in guiding principles affirmed through MPSC Orders and stakeholder feedback: supporting EV adoption while ensuring customer affordability benefits at the portfolio level, addressing near-term market failures such as charging gaps, and advancing equity for low-income customers and disadvantaged communities. Program enhancements are supported by extensive stakeholder engagement, including outreach to 142 organizations, with 92% of surveyed participants reporting satisfaction with DTEE's engagement process.

The Company will continue to provide annual progress updates and maintain compliance with all MPSC filing requirements. Through this comprehensive, data-driven, and equity-focused strategy, DTEE aims to maximize customer benefits, support grid readiness, and advance Michigan's clean transportation future while supporting accessibility for the communities it serves.

[5] Included responses from thirteen utilities such as AEP, Duke Energy, Arizona Public Service, SRP, Southern Company, Ameren (MO & IL), Puget Sound Energy, Tucson Electric Power, Portland General Electric, Southern California Edison, Xcel Energy and Seattle City Light

1.2 Summary of Recommendations

The proposed TEP portfolio achieves DTEE's guiding principles by facilitating charger deployment for key segments through rebates, ensuring affordability benefits for all customers at the portfolio level, closing charging gaps, improving the electrification economics, and promoting equity for Low and Moderate Income (LMI) customers and rural and disadvantaged communities. The proposed portfolio of TEP rebates for 2027-2031 is summarized in the table below:

Table 1 Proposed TEP Rebate Programs 2027-2031

Customer Segment	Customer Sub-Segments	Rebate[6]	No. of Rebates	Share of Market	Total Investment (M)
Residential	LI 200% FPL Level 2	$2,000	1,365	100%	$2.7
	MI 201-400% FPL Level 2	$1,500	7,315	100%	$11.0
	Non-LI Level 2	$500	19,265	15%	$9.6
Multi-Unit Dwellings (MUDs)	LI Level 2	$14,400	1,280	100%	$18.4
	Non-LI Level 2	$5,000	8,000	42%	$40.0
Public	DAC/rural on-route DCFC	$70,000	365	40%	$25.6
	All other on-route DCFC	$50,000	365	40%	$18.3
Workplace	Public Level 2	$3,750	1,125	4%	$4.2
Fleet	Transit bus DCFC	$100,000	10	100%	$1.0
	School bus DCFC[7]	$17,000 - $100,000	35	30%	$1.3
	Other DCFC	$25,000	10	1%	$0.3
	Level 2	$5,000	730	25%	$3.7
Total Proposed Rebate Investment					**$136.0**

This portfolio supports approximately 39,080 Level 2 (L2) chargers and 785 DCFCs. Beyond the rebate program details summarized in Table 1 above, the overall TEP portfolio reflects how investment is allocated across customer segments and supporting functions with the table below.

[6] LI Residential and LI MUD are average estimates based on total installation costs and would not exceed actual costs

[7] School bus rebates are tiered based on the charger capacity output

Table 2 Proposed TEP Investment Summary and Share of Spend[8]

Investment Category	Description	Investment ($M)	Share of Total Investment
Residential	Single-Family Home (SFH) L1 and L2 rebates, with emphasis on low- and moderate-income households	23.3	14%
MUDs	L2 charging infrastructure for multifamily properties, prioritizing LI housing	58.4	36%
Public	On-route DC fast charging	43.8	27%
Workplace	Public Level 2 charging	4.2	3%
Fleet	Transit, school bus, and commercial fleet charging infrastructure	6.2	4%
Subtotal – Rebate Programs	**Direct charging infrastructure incentives**	**136.0**	**83%**
Supporting Functions	Program Administration, Education & Outreach, Emerging Technology Fund, and TEP IT capabilities	27.0	17%
Total TEP Investment	**All rebates and supporting functions**	**162.9**	**100%**

- Over 40%[9] of the $136 million rebate portfolio is directed toward programs designed to promote equitable access to EVs and charging infrastructure.
- Supporting functions include $9.9 million for Program Administration, $8 million for Education and Outreach (E&O), $7.5 million for the Emerging Technology Fund (ETF), and $1.5 million for TEP IT capabilities.
- The TEP portfolio-level BCA indicates approximately $1.8 billion in long-term rate relief for DTEE customers.

To illustrate how these proposed investments are phased over time, the table below summarizes total annual TEP spending by program category, including rebates and supporting functions.

Table 3 Proposed Annual TEP Investment by Category, 2027–2031

Category ($M)	2027	2028	2029	2030	2031	Total[10]
Rebate Programs	18.9	25.4	28.0	30.8	32.9	136.0
Education & Outreach	1.5	1.6	1.6	1.6	1.7	8.0
Program Administration	1.8	1.9	2.0	2.1	2.1	9.9

[8] Total variances due to rounding
[9] See Table 18 for a breakdown of Equity-Focused Rebate Participation by customer segment
[10] Summation variances due to rounding

Category ($M)	2027	2028	2029	2030	2031	Total[10]
Emerging Technology Fund	1.5	1.5	1.5	1.5	1.5	7.5
TEP IT Capabilities	0.3	0.3	0.3	0.3	0.3	1.5
Total	**24.0**	**30.7**	**33.4**	**36.3**	**38.5**	**162.9**

Through the TEP, DTEE established foundational capabilities to monitor, facilitate, and develop the EV charger network in Southeast Michigan. With the TEP Refresh, the Company will continue to closely monitor market trends and program performance, and apply lessons learned through periodic updates and future filings, while maintaining alignment with TEP guiding principles.

Across customer segments, DTEE's recommended TEP portfolio focuses on targeted rebates and utility make-ready investments to address distribution-side infrastructure barriers that can limit charger deployment. Consistent with historical practice and Commission guidance, the Company proposes to support appropriate utility-side make-ready upgrades, while site hosts, customers, and other funding sources continue to play a direct role in covering customer-side and equipment costs, ensuring infrastructure readiness is addressed in a manner that is scalable, equitable, and cost-effective.

2 Introduction

2.1 Scope and Purpose

DTEE aims to reliably accommodate EV adoption on the grid and support Michigan's transition toward decarbonization. In response to the MPSC's November 2022 Order in Case No. U-20836, which directed DTEE to submit a full-scale, permanent Charging Forward proposal including a robust BCA, the Company filed its original TEP in January 2024 (Case No. U-21538).

The scope of this TEP Refresh extends and builds upon the original plan, now encompassing the years 2027 through 2031. This refresh is developed in accordance with the MPSC's January 2025 Order (Case No. U-21492), which sets forth comprehensive filing requirements for Michigan utilities, and state policy objectives. A detailed cross-reference of Commission guidance in the Orders in Case Nos. U-21492, U-21534 and U-21860 and the corresponding TEP sections is provided in Appendices A, B, and C.

Specifically, this TEP Refresh:

- Meets the biennial filing deadline and commits to ongoing annual status reporting.
- Describes distribution and publication requirements[11].
- Documents outreach and stakeholder engagement activities.
- Coordinates with Commission Staff on filing schedules and procedural matters, as applicable.
- Supports state and regional policy objectives and DTEE's Distribution System and Integrated Resource Plans, as outlined in Section 1.1.
- Provides market and equity analysis, including lessons learned, equity outcomes, and targeted programs for LMI customers and rural / disadvantaged communities (DACs).
- Presents detailed forecasting and scenario planning, including vehicle and charger adoption, load shapes, and methodology for meeting state goals.
- Performs a robust BCA and clarifies cost recovery processes.
- Summarizes pilots, key performance indicators (KPIs), and the public comment process, including program findings, metrics for success, and opportunities for stakeholder input.

The purpose of this TEP Refresh is to communicate DTEE's investment strategy, program portfolio, and analytical approach for transportation electrification through 2031. It summarizes benchmarking and market assessment, outlines the Company's strategy to support EV adoption and manage grid impacts, details proposed programs and investment levels, and presents the resulting BCA.

By addressing MPSC filing requirements and incorporating lessons learned from program execution, benchmarking, and stakeholder engagement, this TEP Refresh supports prudent, effective investment in Michigan's evolving transportation landscape.

2.2 Company Overview

DTE Energy (NYSE: DTE) is a Detroit-based diversified energy company involved in the development and management of energy-related businesses and services nationwide. Its operating units include an electric company serving 2.3 million customers in Southeast Michigan and a natural gas company serving 1.3 million customers in Michigan. The DTE portfolio also

[11] TEP is published with Empowering Michigan downloadable on the Performance Reports 2026 tab at https://empoweringmichigan.com/dte-impact/performance/, April 2026

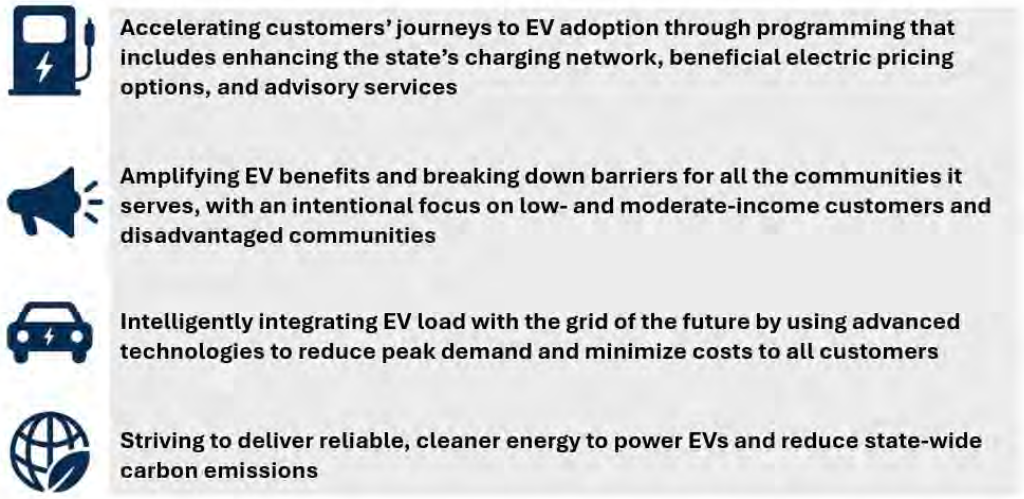
includes non-utility businesses focused on industrial energy services, renewable natural gas, and energy marketing and trading.

As one of Michigan's leading corporate citizens, DTE Energy is a force for growth and prosperity in the 450 Michigan communities it serves in a variety of ways, including philanthropy, volunteerism and economic progress. Information about DTE Energy is available on the DTE Energy home page, X account and Facebook page.

DTE Energy has more than 10,000 employees in utility and non-utility subsidiaries involved in a wide range of energy-related businesses. The company's growing non-utility businesses are built around the strengths, skills and assets of DTE Energy's electric and gas utilities.

2.3 Vision and Guiding Principles

DTEE's EV vision, in support of its Net Zero by 2050 commitments, is to power and enable a cleaner energy future for its customers through transportation electrification. The Company aims to do this by:



DTEE's TEP was developed to enable this vision while adhering to the following guiding principles:

- Support and accelerate EV adoption by facilitating charger deployment while ensuring affordability benefits for all DTEE customers at the portfolio level,
- Consider unique reasons for utility participation such as closing charging gaps and improving economics of electrification in the near-term, and
- Promote equity with a focus on low-income customers and disadvantaged communities.

2.4 EV Market in Southeast Michigan

Transportation electrification continues to grow across Southeast Michigan, and EV adoption forecasts serve as foundational inputs to DTEE's TEP. This section presents historical EV registration data, adoption scenarios, forecasting methodology, EV-related load forecasts, and technology trends informing long-term system planning.

2.4.1 Historical EV Registration Trends

EV registrations in DTEE's service territory have grown at a compound annual growth rate (CAGR) of nearly 57% from 2021 to 2025, increasing from approximately 8,000 units in 2021 to more than 48,000 units in 2025. As of December 2025, approximately 86% of EVs sold in Michigan are registered within the DTEE service area, with over 79% of those being battery electric vehicles (BEVs)[12]. Currently, there are 114,115 EV's on the road and the Company projects this number could surpass 423,000 vehicles by 2031, inclusive of medium- and heavy-duty (MHDVs) and buses, as shown in Figures 1 and 2 below[13].

[12] The balance are plug-in hybrid EVs; regenerative hybrids and hydrogen fuel cell vehicles are not considered EVs
[13] S&P Global Data as of December 31, 2025; Registration volume includes medium-duty and heavy-duty vehicles

Figure 1 Actual and Forecasted Annual New EV Registrations in the DTEE Service Territory; 2019-2031 (thousands)

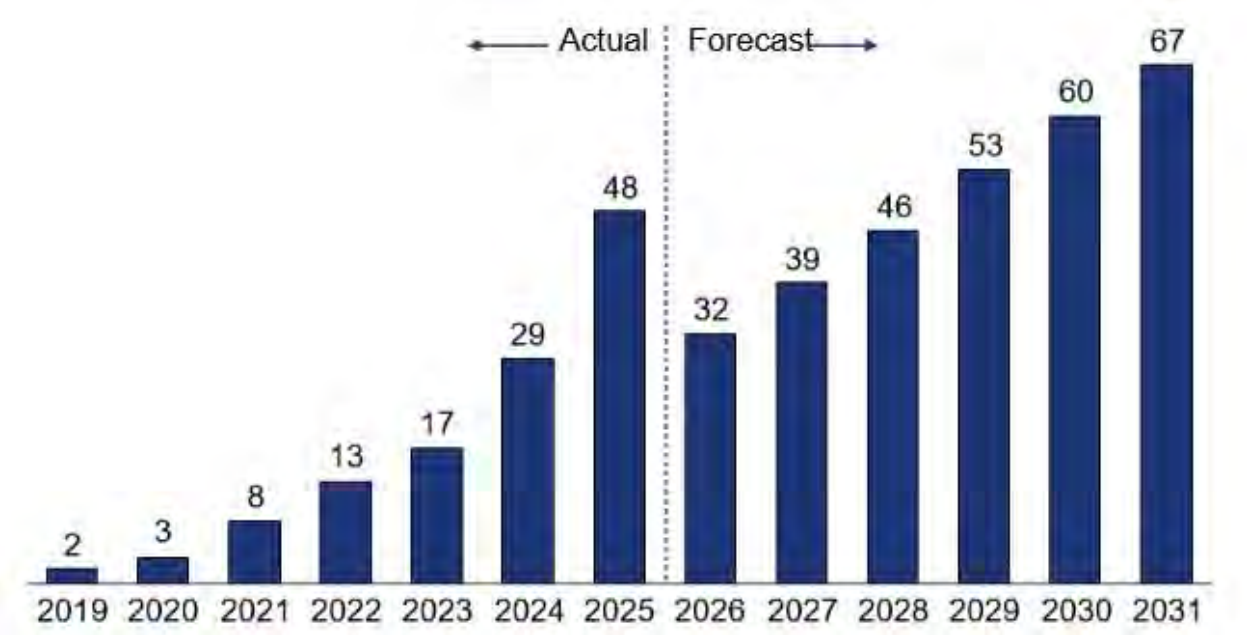
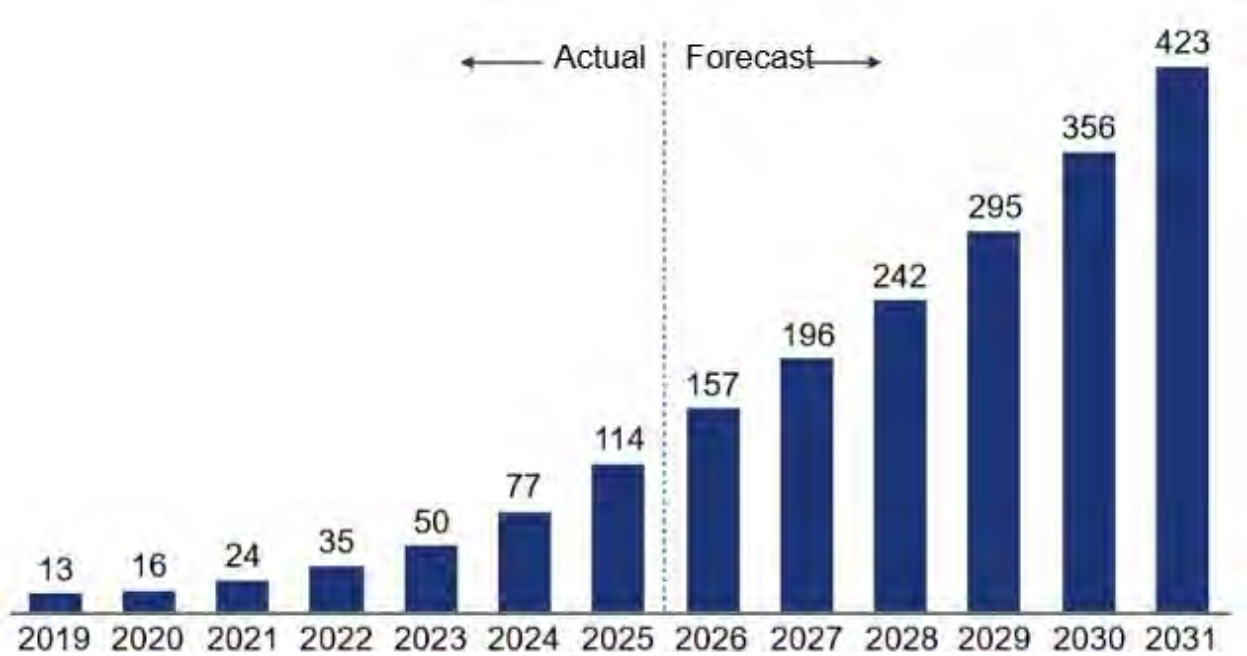


Figure 2 Actual and Forecasted Total EV adoption in the DTEE Service Territory; 2019-2031 (thousands)



2.4.2 Charging and Vehicle Technology Trends

The EV adoption, energy, and demand forecasts presented in Sections 2.4.3–2.4.6 are informed by several key charging and vehicle technology trends observed in the market. Advancements in EV efficiency, battery performance, vehicle mix, and early medium-duty electrification continue to shape the vehicle miles traveled (VMT) and electric-intensity assumptions. Steady gains in drivetrain and battery efficiency reduce kilowatt-hour (kWh) per mile, while increasing adoption of SUV and light-truck EVs raises segment-weighted energy intensity despite class-specific improvements. Longer-range models modestly increase VMT by reducing range limitations, and early medium-duty fleet electrification introduces higher-mileage duty cycles and distinct energy profiles captured in segment-specific assumptions.

Charging technology trends also influence the Company's system-level load shapes and forecasted EV demand. Growing use of mid-power L2 chargers affects charging duration and aggregated hourly load patterns, while the transition to North American Charging Standard (NACS) may shift more charging to public and workplace locations. Expanding workplace and destination charging increases midday load and influences peak timing. Together, these vehicle and charging trends inform the Company's EV energy and demand forecasts, affecting electric intensity, VMT, load shapes, and associated infrastructure needs.

2.4.3 EV Adoption Forecast and Scenarios

DTEE's baseline EV adoption forecast represents the Company's highest-probability scenario. Under this scenario, as shown in Figures 1 and 2 above, EVs in operation within the Company's service territory are projected to grow substantially over the planning horizon. This scenario reflects the most likely market conditions, incorporating OEM production plans, economic and demographic drivers, and observed regional adoption patterns. This growth trajectory forms the basis for charging infrastructure needs, load impacts, and program design evaluated throughout this TEP.

As required by the Commission, DTEE modeled an alternative scenario informed by the State of Michigan's aspirational goal of supporting two million EVs by 2030, which is used as an upper-bound sensitivity case to evaluate infrastructure and load implications. Accelerated adoption curves for light duty vehicles (LDV), MHDV, and bus segments were applied to estimate infrastructure and system impacts associated with achieving statewide mobility goals. This

scenario serves as an upper-bound sensitivity case used for infrastructure planning and is assessed in Section 7.2.

2.4.4 EV Stock Forecasting Methodology, Tools and Data Sources

Forecasted EV adoption in DTEE's service territory is a key input into to the TEP. The 2026 EV adoption forecast (Figures 1 and 2) begins by analyzing historical adoption trends within the Company's service area using data from S&P Global. LDV, and MHDV vehicle sectors with further segmentation of LDVs into personal vehicles, dealer/manufacturer vehicles, and light commercial fleets were examined to assess market potential and broader EV trends. MHDV categories include explicit projections for buses (school and transit).

For each segment, the Company uses externally purchased market share projections from the Electric Power Research Institute (EPRI), specific to DTEE's service area, as the starting point. These projections estimate EV market share (percent of new sales), which is then used as input to calculate annual new EV sales within the service area. Annual sales are aggregated and adjusted for vehicle turnover to determine total EV stock (vehicles on the road).

Certain market share and vehicle adoption inputs are sourced from proprietary datasets (e.g., S&P Global, EPRI). While the underlying datasets are not publicly distributable, the methodology, assumptions, and resulting outputs are fully described and presented in this TEP to enable review and evaluation.

2.4.5 EV Energy Forecast

DTEE converts projected EV stock into an annual EV-specific energy consumption forecast that is the product of three core variables for each vehicle segment:

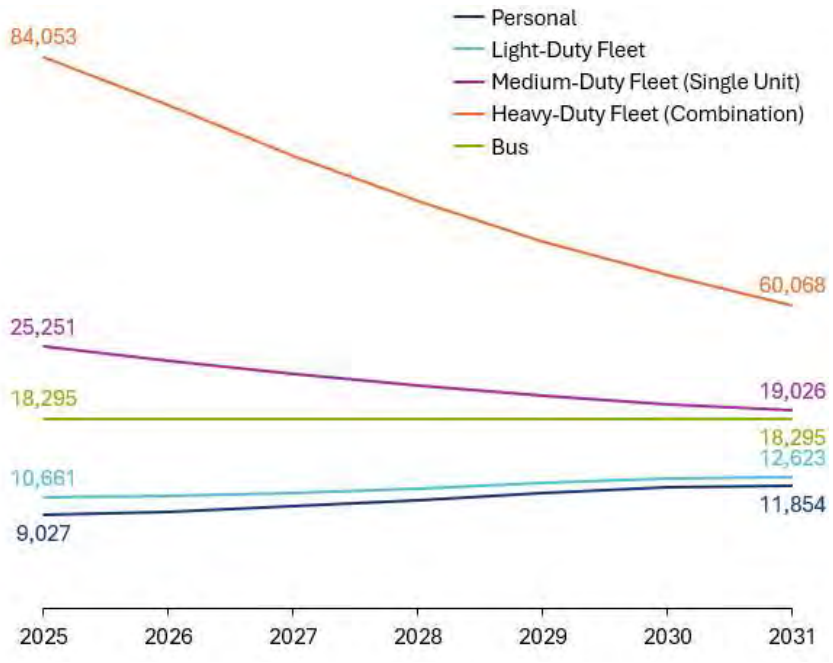
1. Vehicle stock: **The total number of vehicles** on the road for each vehicle segment (light-, medium-, and heavy-duty)
2. **Vehicle miles traveled**: Average annual miles traveled per vehicle segment
3. **Electric intensity**: Average electric consumption (kWh/mile) per vehicle segment

Formally, the EV energy forecast for each vehicle segment is calculated as:

EV Energy (kWh) = Number of Vehicles × VMT × Electric Intensity (kWh/mile)

VMT and electric intensities projections were developed through a combination of internal estimates based off historical registration data, Environmental Protection Agency (EPA) fuel economy ratings[14], and Energy Information Administration (EIA) projections[15], tailored to each vehicle segment. These values are calibrated for each vehicle class to reflect expected efficiency improvements and evolving vehicle mix across the forecast horizon. Figures 3 and 4 illustrate projected VMT and electric intensity trends, and Figure 5 presents the resulting cumulative EV load forecast for the DTE Electric service territory.

Figure 3 Electric Average Annual VMT Forecast



[14] Environmental Protection Agency (EPA) fuel economy rating available at https://www.fueleconomy.gov/feg/download.shtml
[15] Energy Information Administration (EIA) projections available at https://www.eia.gov/outlooks/aeo/, April 2025

Figure 4 Electric Vehicle Intensity Forecast

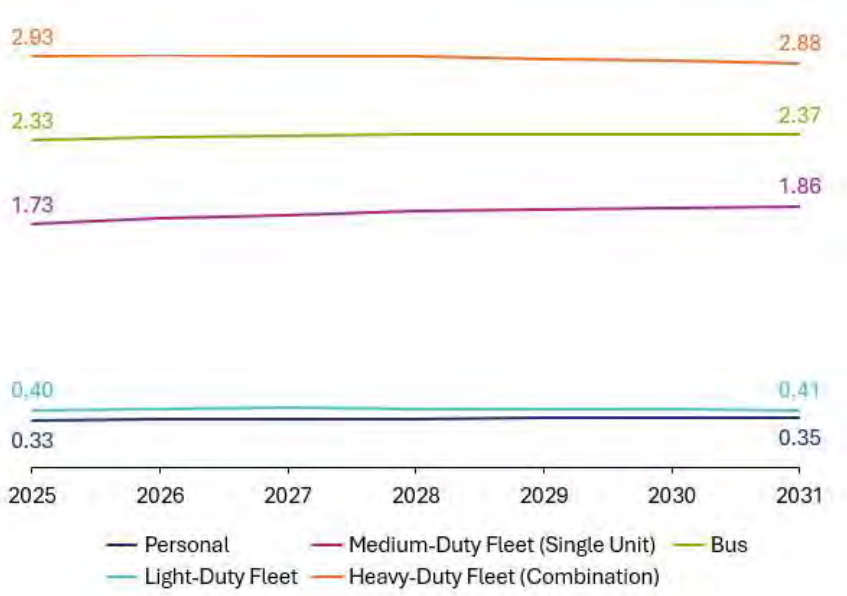
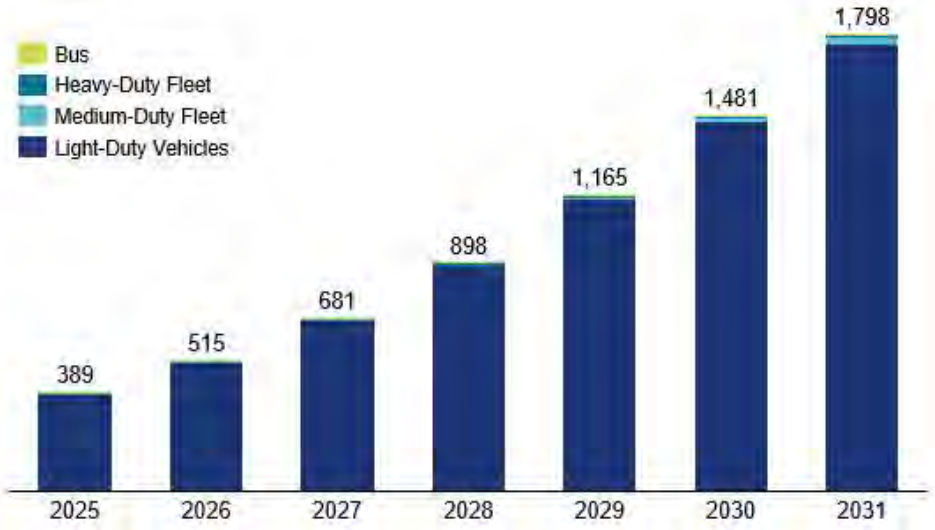


Figure 5 Cumulative DTEE Service Territory Forecasted Load (GWh)[16]



[16]Reflects the total load from all electric vehicles in operation as of a given year; 2025 load calculations reflect the TEP market assessment planning assumption of approximately 125,000 EVs in operation.

2.4.6 EV Peak Demand Forecast

Beyond annual energy requirements, the Company projects EV electricity demand at an hourly level to project peak demand impacts. This is achieved using a bottom-up hourly load model developed in Itron's MetrixND and MetrixLT applications. The model aggregates hourly load profiles to forecast peak demand, enabling analysis of how changing load shapes affect system peaks. As with other end-uses the Company models, hourly EV demand is modeled using the following load profiles:

1. **Residential Charging** - Includes home charging behaviors under various Time of Day (TOD) rate options, reflecting differences in when customers initiate charging. Immediate charging assumes customers begin charging as soon as they plug in after returning home, typically in the late afternoon or early evening. Delayed charging assumes customers intentionally schedule charging to start during designated off-peak periods (e.g., early evening, late night, or overnight) using vehicle or charger settings. Profiles are informed by the Company's EV Identification Model[17], results from the Company's EV data sharing pilot, historical Advanced Metering Infrastructure (AMI) data, and the U.S. Department of Energy (DOE) EVI-Pro Lite tool[18]
2. **Workplace Charging** – Based on historical telematics data from the Company's EV Programs
3. **Public Charging** – Includes L2 and DC fast charging, developed using historical AMI data from separately metered chargers
4. **Fleet Charging** – Covers delivery vehicles and buses, using historical AMI data and public studies from the California Energy Commission[19]

The profiles leveraged can be seen in Figures 6 and 7 below by customer segment, and are scaled to the annual energy forecasts, adjusted for losses, and summed amongst all end-uses to predict the system total. The highest hourly value in a year or month is the peak demand forecast. Modeling peak demand using a bottom-up approach is advantageous in that it enables the ability to model sensitivities around load shape diversity. As technologies like EVs gain adoption, bottom-up modeling provides insight into changes in circuit, substation, and system peaks, as well as the

[17] The EV Identification Model is an in house developed tool that analyzes residential electricity consumption patterns to determine whether Level 2 EV charging activity is likely to have occurred at the premises
[18] U.S Department of Energy (DOE) EVI-Pro Lite tool available at Alternative Fuels Data Center: Electric Vehicle Infrastructure Toolbox (EVI-X Toolbox) https://afdc.energy.gov/evi-x-toolbox#/evi-pro-loads
[19] State of California Energy Commission Medium and Heavy Duty Load shapes available at https://www.energy.ca.gov/sites/default/files/2021-09/5%20LBNL-FTD-EAD-HEVI-LOAD%20Medium-%20and%20Heavy-Duty%20Load%20Shapes_ADA.pdf, September 2021

timing of those peaks. This robust application of projecting EV energy demand is consistently applied across the Company's planning processes.

Figure 6 Residential EV Charging Strategy Load Shapes[20]

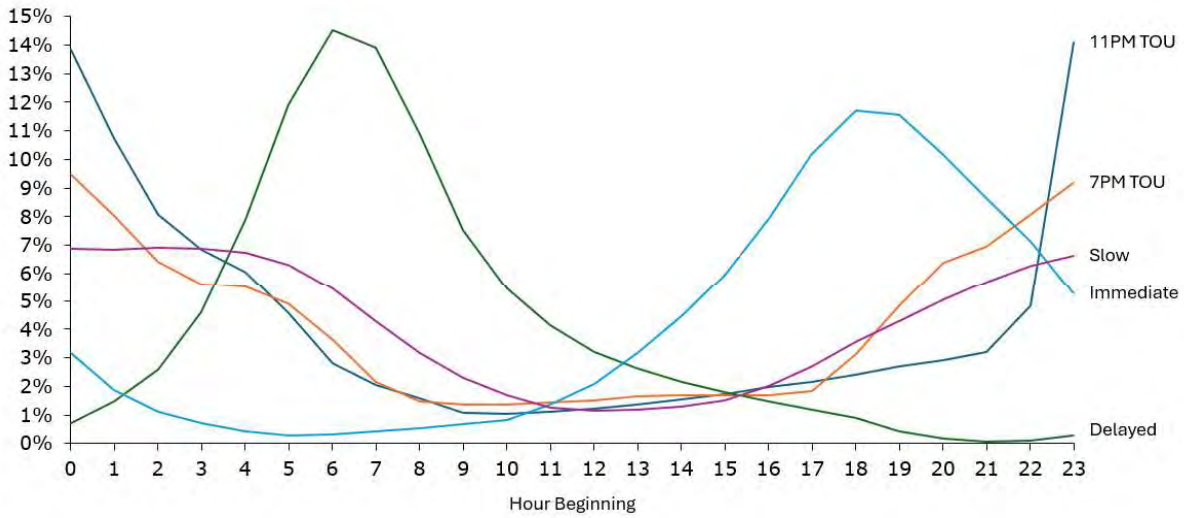
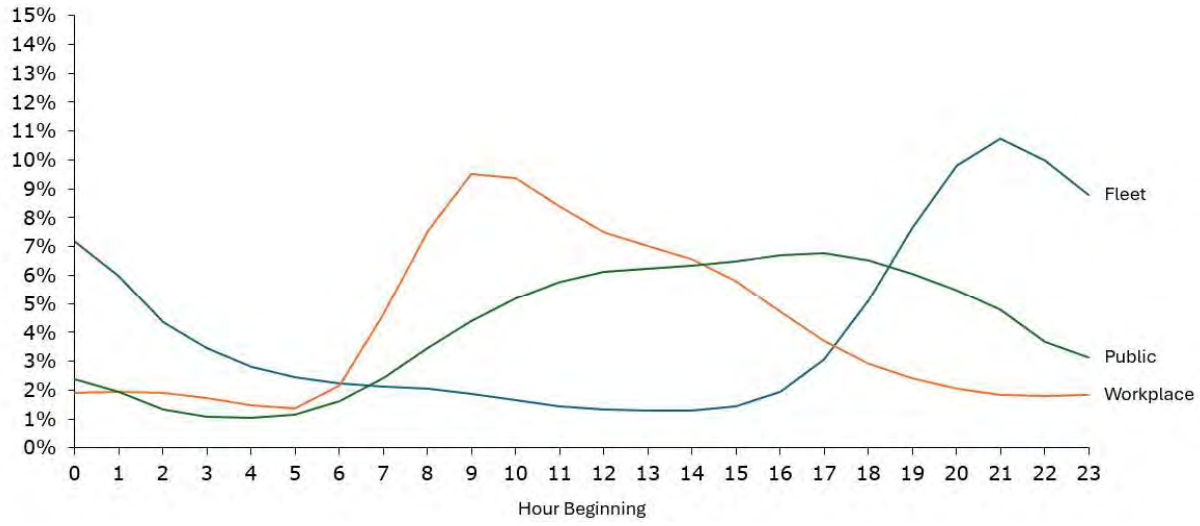


Figure 7 Commercial Charging Hourly Load Shapes



[20] Sample residential EV charging profiles are representative and used for modeling purposes only. 2025 DTEE Residential Customer Appliance Survey responses informed the weighting of charging strategies, which are applied to these profiles and aggregated across customers to capture load diversity for peak demand forecasting.

2.4.7 Public Charging Landscape and Market Barriers

As of December 2025, Michigan has over 5,175 operable public EV chargers according to the U.S. Department of Energy's (DOE) Alternative Fuels Data Center (AFDC)[21]. Additionally, the State of Michigan Community EV Toolkit notes that there are over 2,000 public charging locations statewide[22]. Nearly 55% of those chargers, are located in the DTEE service area[23]. Despite continued expansion, gaps in public charging availability remains one a barrier to EV adoption. The 2024 Plug In America–EPRI EV Driver Survey[24] found that 48.6% of potential EV buyers identified public charging access as their primary concern. This national trend is fully reflected in Michigan[25], where charging availability consistently influences customer perceptions of EV ownership.

Public charging barriers observed in DTEE's service territory fall into two primary categories: barriers that electric utilities can address and barriers that are largely outside of utility control. Distinguishing between these categories is critical to informing appropriate utility action and aligning proposed solutions with Commission guidance. Barriers within the scope of electric utility influence primarily relate to utility-side infrastructure readiness, coordination, and information gaps. These include:

- High utility-side make-ready costs, particularly for public DCFC sites requiring transformer upgrades, service extensions, or feeder reinforcements;
- Complexity and uncertainty associated with interconnection and energization, which can extend project timelines for public charging sites;
- Limited technical familiarity among prospective site hosts, including uncertainty around electrical requirements, utility processes, and coordination with third-party funding programs; and
- Historical limitations in charging usage data, which have constrained planning visibility and infrastructure optimization.

[21] U.S Department of Energy (DOE) Alternative Fuels Data Center available at https://afdc.energy.gov/stations#/find/nearest
[22] State of Michigan EV Toolkit available at https://southeast-michigan-ev-resource-kit-and-planning-hub-semcog.hub.arcgis.com/pages/88b65c230269453a8f906a3803e3b8cb
[23] Alternative Fuels Data Center: Alternative Fueling Station Locator; Data as of 12/1/2025 tied to DTE zip codes
[24] EPRI Plug in America EV Driver Annual Survey Report available at https://pluginamerica.org/wp-content/uploads/2024/09/2024-Plug-In-America-EPRI-EV-Driver-Survey-Report_Final.pdf, 2024
[25] DTE 2023 Residential Customer appliance Survey, Electric Vehicle

These barriers are most pronounced for high-power public charging installations, where electrical upgrades and coordination requirements materially influence project feasibility and cost.

Several barriers affecting public charging deployment and utilization are outside the direct control of electric utilities, yet materially influence market outcomes. These include:

- EV charging equipment pricing and availability, which are subject to global supply chains and manufacturer pricing strategies;
- Local permitting, zoning, and inspection timelines, which vary significantly by jurisdiction and can delay project completion;
- Uncertainty in federal and state incentive availability, including the timing, eligibility, and continuity of grant programs;
- Site host commercial considerations, such as land use priorities, lease structures, and return-on-investment thresholds; and
- Evolving EV driver behavior and utilization patterns, influenced by vehicle mix, range improvements, and charging preferences.

While utilities cannot directly resolve these barriers, they influence program design assumptions.

Recent policy and market developments present emerging challenges for public charging deployment, including federal funding uncertainty, rising construction and labor costs, and shifting utilization expectations driven by evolving vehicle range and travel behavior. These dynamics reinforce the importance of distinguishing market context from utility program responses, ensuring that proposed solutions remain adaptive to evolving conditions.

Section 4 of this TEP describes how DTEE's proposed portfolio responds to the public charging barriers identified above, including targeted actions to address utility-side infrastructure costs, coordination challenges, and equity-related access gaps. Program design elements, investment levels, and implementation strategies are addressed in detail in Section 4.3 (Public On-Route DC Fast Charging) and Section 4.4 (Workplace Charging).

2.5 State and Federal Policies and Programs

DTEE operates exclusively within the State of Michigan; therefore, this TEP focuses on Michigan's transportation electrification policies and programs. Michigan's clean transportation future is being shaped by ambitious state and federal policies, but recent changes in the policy landscape have

made utility EV programs more critical than ever. Michigan's commitment to decarbonization began in September 2020, when Governor Whitmer signed Executive Directive 2020-10, setting a goal for Michigan to achieve economy-wide net-zero emissions by 2050 and directing the Department of Environment, Great Lakes, and Energy (EGLE) to develop a pathway to carbon neutrality.

Michigan's transportation electrification efforts are supported by a combination of statewide policy direction and targeted public investment. State initiatives emphasize vehicle electrification, expanded charging access, and clean mobility programs, complemented by dedicated funding to address market barriers. In support of these priorities, Michigan allocated more than $145 million in its 2023–2024 budget for clean mobility initiatives, including $125 million to advance electric school bus deployment.

Federal policies have also played a pivotal role. The Bipartisan Infrastructure Law (BIL) and Inflation Reduction Act (IRA) introduced unprecedented funding streams for EV adoption. Through the BIL's National Electric Vehicle Infrastructure (NEVI) program, Michigan is slated to receive $110 million to build out alternative fuel corridors, with approximately $58 million already awarded in the first two rounds[26].

The BIL also established the Charging and Fueling Infrastructure (CFI) discretionary grant program, a competitive federal program to support the deployment of publicly accessible EV charging infrastructure in communities and along designated alternative fuel corridors, with a statutory emphasis on underserved areas. Three funding rounds were awarded through January 2025. While future availability of CFI funding remains uncertain, DTEE continues to coordinate with the two awarded cities[27] within its service territory by supporting utility planning, conducting engineering risk assessments, and identifying sites with available system capacity.

The BIL also supports the Environmental Protection Agency's Clean School Bus (CSB) program, which has been a major success in Michigan. DTEE's Fleet Advisory Services team proactively engaged over 160 school districts in its service territory, resulting in applications for more than 200 electric buses. Through all three rounds of funding, 142 buses were awarded to 24 districts. However, recent EPA CSB funding rounds were temporarily suspended for 2025, creating

[26] National Electric Vehicle Infrastructure (NEVI) Formula Program available at https://www.michigan.gov/mdot/travel/mobility/initiatives/nevi
[27] Charging and Fueling Infrastructure Program Grant Recipients available https://www.fhwa.dot.gov/environment/cfi/grant_recipients/

uncertainty for future awards. To help bridge this gap, the Michigan Department of Education launched Clean Bus Energy Grant (CBEG) program. Within DTEE's service territory, 51 electric school buses[28] were awarded to 10 districts in 2025. Another round of applications closed at year end and awards were announced in February 2026 for 57 electric school buses across seven schools in the Company's service territory.

Additional state-level efforts include EGLE's multifamily charging initiative, which allocated $5 million in grants to support EV charger installations at multi-unit properties, of which $3.9 million has been approved through 2025. These grants can be combined with utility rebates and together often cover the full cost of installation. These programs complement federal incentives, though recent changes have introduced new challenges. The federal EV tax credit for new purchases expired on September 30, 2025, and the 30C Alternative Fuel Vehicle Refueling Property Tax Credit[29], covering up to 30% of EV charging equipment costs (up to $100,000 for businesses), will end on June 30, 2026. With these credits ending, cost barriers for EV purchases and charging installations are likely to rise.

Compounding this challenge, Michigan now has the highest EV registration fees in the nation, with annual costs rising by a minimum $100 as part of a broader overhaul of road funding, which may further discourage adoption. Purchase price and limited access to public charging remain top concerns for non-EV owners, with 38% and 45%[30] of respondents citing these as reasons for not considering an EV. The expiration of federal incentives is expected to further increase cost barriers.

These policy developments are reflected in the TEP's updated forecasts, assumptions, and program design described in subsequent sections.

2.5.1 One Big Beautiful Bill Act (2025) – Analysis of EV Adoption and Load Impacts

In its February 2026 Order in Case No. U-21860, the Commission directed DTEE to evaluate how the OBBB act may influence the adoption of electric vehicles and the resulting EV-related electric

[28] Johnston (2025) New grants push Michigan's number of clean-powered school buses toward 900. *Department of Environment, Great Lakes, and Energy*; https://www.michigan.gov/egle/newsroom/press-releases/2025/10/13/school-buses
[29] Kirchoff S. (2025). The End of Clean Vehicle Credits: What Businesses Need to Know. *CCEF*; https://cocleanenergyfund.com/end-of-clean-vehicle-credits-for-businesses/
[30] 2025 DTEE Residential Customer Appliance Survey

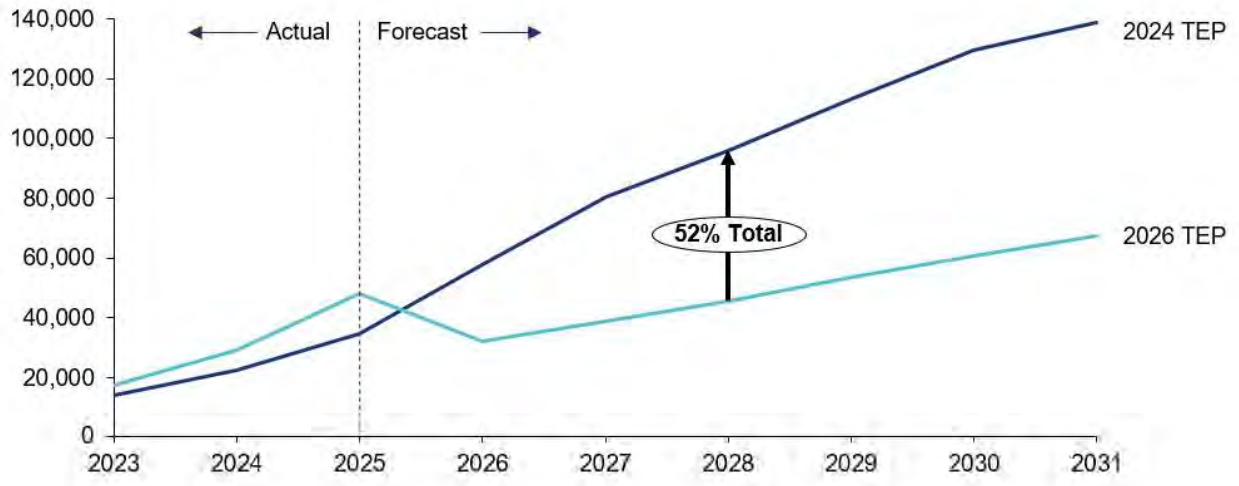
load within the Company's service territory. In response, DTEE incorporated OBBB's elimination of the federal $7,500 EV income tax credit into its existing customer Total Cost of Ownership (TCO) modeling and adoption forecasts. This analysis was designed to determine whether the changes meaningfully alter the long-term financial considerations that customers weigh when choosing between gas vehicles and electric alternatives.

To conduct this assessment, DTEE updated its TCO model to reflect the loss of the $7,500 incentive into its TCO modeling framework. These changes were applied across representative light-duty vehicle classes commonly purchased in Southeast Michigan, and were evaluated across a ten-year ownership window. The TCO model incorporates core cost components such as vehicle purchase, charger acquisition and installation, maintenance cost reductions, electricity and gasoline price differentials, depreciation, insurance, and annual registration fees.

Under the prior law, EV purchases received a $7,500 reduction to upfront ownership costs. With the elimination of this incentive, the modeled ten-year period EV TCO increases from $77,194 (with credit) to $85,694 (without credit). Although EVs continue to deliver meaningful lifetime benefits (approximately $16,000 in avoided fuel costs and $4,000 in reduced maintenance costs) the removal of the federal credit materially affects EV affordability in the early years of the planning horizon.

The results indicate that the removal of the federal EV tax credit is the primary near-term driver of reduced EV adoption impacts, resulting in an approximately 52% decline in total projected EV registrations during the TEP Refresh timeframe relative to the previous TEP forecast, as shown in Figure 8. This outcome reflects the sensitivity of near-term EV adoption to upfront cost changes as the market transitions beyond early adopters.

Figure 8 Annual EV Forecast of New Sales: 2024 TEP vs. 2026 TEP



Because EV adoption directly affects expected charging behavior and energy consumption, DTEE also evaluated resulting EV load impacts. The reduction in EV sales produces a corresponding decline in EV-related load, tapering over time as broader EV technology cost declines continue to improve EV affordability. These load impacts are reflected in the updated baseline forecast described in Section 2.4, and represent a meaningful downward adjustment to the near-term load expectations.

Importantly, the Company's analysis shows that OBBB's removal of the federal tax credit introduces a structural headwind for EV adoption at a critical stage of Michigan's market development. Through measures such as customer education, charging-infrastructure deployment, load-flexibility incentives, and rate design, the TEP provides counterbalancing market support that helps preserve progress toward long-term electrification goals despite the diminished federal incentive environment.

In summary, the Company concludes that OBBB (through removal of the federal EV tax credit) has a material effect on near-term EV adoption and associated load but a diminishing influence over the long term. DTEE has incorporated these updated assumptions into its market assessment, scenario development, and benefit-cost analysis (Section 7.2), ensuring a consistent and transparent planning foundation across related regulatory filings.

Table 4 Summary of Incremental TCO Impacts from OBBB Act[31]

TCO Component	EV (No OBBB)	EV (With OBBB)	Gas Vehicle
Vehicle Purchase Price	$36,595	$44,095	$33,600
Charger and Installation Costs[32]	$2,030	$2,030	$0
Maintenance	$6,182	$6,182	$10,235
Fuel / Electricity Costs	$5,810[33]	$5,810	$21,852
Michigan Registration Fees	$5,070	$6,070[34]	$2,780
Insurance/Depreciation/Residual	$21,507	$21,507	$16,130
Total 10-Yr TCO	**$77,194**	**$85,694**	**$84,597**

2.6 Summary of DTEE's 2019-2026 EV Programs

DTEE's journey in helping accelerate transportation electrification in its service territory reflects a sustained commitment to innovation, regulatory alignment, and measurable impact. Since the MPSC first approved the Charging Forward pilot in May 2019 (Case No. U-20162), DTEE has continuously expanded and refined its EV programs to meet evolving market needs, and policy directives. Below is a summary of program evolution and timeline:

2019: Launch of Charging Forward pilot, establishing foundational education & outreach and make-ready rebates for residential and business charging infrastructure.

2021: Approval of Charging Forward Fleets (Case No. U-20935), expanding support for commercial and municipal fleets.

2022: Charging Forward Expansion (Case No. U-20836), broadening program reach and integrating lessons learned with a series of business and residential expansion pilot elements.

2023–2024: Continued Charging Forward umbrella program funding (Case No. U-21297) as a bridge to the comprehensive TEP for 2025-2028, published in Case No. U-21538.

[31] Unless otherwise noted, all values are derived from the DTE EV Showroom Buyers Guide for Chevrolet Equinox EV FWD RS. The vehicle was selected because it is one of the three most commonly purchased vehicles in the Company's service territory.
[32] Assumes charger and installation costs for residential customers from Appendix E
[33] Sum of 2027-2036 Price to Customer from BCA. Weighted average of D1.2, D1.11 and D1.13 rates and take into account charging behaviors and Peak/off Peak pricing.
[34] Effective January 1, 2026; Using Clean Fuels Michigan Registration Fee Research as a result of changes to Section 257.801, Section 7 of Michigan Vehicle Code

2025: First-year TEP recovery approved (Case No. U-21534) and DTEE began executing the TEP in February 2025.

2026: DTEE is continuing to execute on its EV programs for the second year of the TEP approval (Case No. U-21860).

The major elements of DTEE's approved TEP program are:

- **Residential Customer Rebates:** Focused on Low Income (LI) SFHs.
- **Business Charger Rebates:** Targeting MUDs, Public on-route DC DCFCs, and Workplace Level 2 (L2) Chargers.
- **Fleet Charger Rebates:** Supporting transit bus DCFCs, school bus DCFCs, other fleet DCFCs, and L2 fleet chargers.
- **E&O:** Includes customer outreach, digital resources, in-person "ride and drive" and educational events, and advisory services for MUDs and Fleets.
- **Emerging Technology Fund:** Enables timely funding of innovative pilots.
- **TEP IT Capabilities:** Supports data tracking, reporting, and program management.
- **Program Administration:** Maintains a permanent EV team for strategy and execution.

By end of December 2025, TEP investments have supported the infrastructure deployment of over 640 chargers with approximately 1,800 more approved and pending installation as shown in the table below.

Table 5 TEP Charger Rebate Status as of December 2025

Rebates Provided	Installed	Pending Installation	Total Approved
Residential Charger Low-Income (LI)	294	0	294
Multi-Unit Dwelling LI	22	132	154
Multi-Unit Dwelling Non-LI	98	1,124	1,222
Public On-Route DAC DCFC	44	179	223
Public On-Route Non-DAC DCFC	41	256	297
Workplace L2 Charger	4	63	67
L2 Fleet Charger Rebates	115	31	146
Transit Bus Fleet DCFC Charger	0	0	0

Rebates Provided	Installed	Pending Installation	Total Approved
School Bus Fleet DCFC Charger	3	12	15
Other DCFC Fleet Charger	20	0	20
Total	**641**	**1,797**	**2,438**

Other key TEP accomplishments from the first year of execution through end of 2025 include:

- Achieving nearly 55 million customer E&O impressions,
- Launching rEV, an educational program led by the National Energy Foundation teaching over 1,000 middle school students across four schools about EVs through interactive videos, classroom activities, and digital resources,
- Conducting over 104 Fleet Advisory Services consultations with 42 TCO analyses for business customers,
- Engaging 62 customers through MUD advisory services, and
- Approving six pilots through the 2025 Emerging Technology Fund

DTEE's EV programs have evolved in direct response to MPSC orders and stakeholder feedback, consistently integrating best practices and benchmarking against peer utilities. The transition from pilot to a full-scale TEP to this TEP Refresh reflects DTEE's commitment to equity, realizing affordability benefits for all DTEE's customers, grid readiness, and positioning the Company as a leader in Michigan's clean mobility transformation.

3 TEP Refresh 2027-2031

3.1 Benchmarking

DTEE conducted extensive benchmarking and stakeholder engagement to assess national trends in TEP design and inform its understanding of emerging best practices. This effort included a review of eight utility TEPs from across the United States, as summarized in Figure 9, a survey of 13 members of the ATE organization, and participation in national and state electric vehicle working groups. Together, these sources provide insight into how utilities are structuring TEP programs to address equity objectives, infrastructure needs, and evolving market conditions.

Figure 9 Overview of Eight TEPs Benchmarked

Company	State	Program Years	Avg. Annual Spend ($M)	Electric Customers	2030 EV Forecasts	ZEV State[35]	Survey[36]
comed AN EXELON COMPANY	IL	'26-'28	56	4.1	1,000,000		
Consumers Energy Count on Us	MI	'24-'30	16	1.9	500,000[37]		
conEdison	NY	'24-'29	120	3.8	500,000[38]	✓	
nationalgrid	MA	'27-'30	49	2.2	500,000	✓	
Portland General Electric	OR	'23-'25	32	0.9	500,000	✓	✓
SOUTHERN CALIFORNIA EDISON	CA	'24-'26	145	5.2	7,000,000	✓	✓
Xcel Energy	CO	'24-'26	88	1.5	940,000	✓	✓
Xcel Energy	MN	'24-'27	11	1.5	797,000	✓	✓

Benchmarking and survey results indicate that residential charging programs nationwide increasingly emphasize income-based or geographically targeted eligibility frameworks to advance equity objectives while supporting broader market participation. Most utilities define residential program eligibility using income thresholds, environmental justice criteria, or a combination of both. Across the utility transportation electrification plans reviewed, income eligibility frequently extends beyond traditional low-income definitions to include moderate-income households. In addition, most utilities offer limited residential incentives to non-low-income customers. Benchmarking shows that 75%[39] of utility TEPs offer tiered rebates that differentiate low-income or disadvantaged community households from non-low-income customers, and survey results indicate that 54%[40] of ATE member respondents provide residential rebates to non-low-income customers. Several benchmarked utilities pair broader residential eligibility with

[35] ZEV Program is a California state regulation that requires automakers to sell EVs in California and other states that adopted the Program

[36] Benchmarking survey, facilitated by the Alliance for Transportation Electrification, included responses from 13 utilities including AEP, Duke Energy, Arizona Public Service, Portland General Electric, Xcel Energy, Salt River Project (SRP), Southern Company, Ameren (MO & IL), Southern California Edison (SCE) Puget Sound Energy, Tucson Electric Power, and Seattle City Light.

[37] CMS forecasts ~500,000 EVs by 2030, but sets an aspirational target at 1M to align with the Michigan Healthy Climate Plan

[38] ConEd EV forecast within its service area were estimated based on state EV targets and customer size

[39] ComEd Beneficial Electrification Plan 2 2026-2028 , Xcel Energy 2024-2026 Transportation Electrification Plan Public Service Company of Colorado, Northern States Power Company (Xcel MN) 2023 Transportation Electrification Plan , National Grid EV Charging Upgrade program, PGE 2023 Transportation Electrification Plan, Consumers Energy Transportation Electrification Plan 2024

[40] Alliance for Transportation Electrification (2025) DTEE TEP Benchmarking Survey [unpublished raw data]

mechanisms to preserve equity outcomes. For example, Commonwealth Edison (ComEd) residential EV charging program allocates approximately $3.5 million annually, or $10.5 million over the 2026-2028 period[41], to support residential EV charging infrastructure. While incentives are available to both low-income and non-low-income customers, ComEd reserves at least 50% of its residential sub-program budget for customers residing in designated Equity Investment Eligible Communities (EIECs). Similarly, Portland General Electric (PGE) offers multiple residential rebate pathways for both low-income and non-low-income customers through its Residential Smart EV Charging Pilot[42] including incentives ranging from $300 to $1,000 for the purchase and installation of qualified Level 2 chargers.

Benchmarking also confirms a strong industry focus on addressing multifamily charging barriers through targeted support for properties serving low-income residents and disadvantaged communities. Of the utility TEPs reviewed, 87%[43] include equity-driven multifamily strategies or comprehensive infrastructure coverage for disadvantaged communities. Industry survey results indicate that no benchmarked utilities mandate a minimum Level 2 charger capacity of 11.5 kW, with at least one utility setting a maximum threshold of 9.6 kW, and many others not establishing any specific capacity threshold.

Public charging infrastructure is another area where benchmarking reveals consistent national trends. Utilities are increasingly prioritizing publicly accessible DCFC, particularly along travel corridors and in disadvantaged or underserved communities. Several utilities have expanded DCFC investments relative to public Level 2 charging, reflecting higher utilization rates and the role of DCFC in enabling long-distance travel and equitable access for customers without home charging. Benchmarking examples from peer utilities include Comonwealth Edison (ComEd) and Southern California Edison (SCE), both of which have expanded DCFC deployments and enhanced incentives for DAC installations. Support for DCFC sites is also often in coordination with federal programs such as NEVI. For example, ComEd dedicates nearly 70%[44] of its incentive budget to the C&I, and public sector EV make-ready -programs serving LI Communities / EIECs

[41] ComEd Beneficial Electrification Plan 2 2026-2028, p. 40-42
[42] PGE 2023 Transportation Electrification Plan, p. 173
[43] Consumers Energy Transportation Electrification Plan 2024, ComEd Beneficial Electrification Plan 2 2026-2028, Consolidated Edison Company of New York Electric Vehicle Infrastructure Make-Ready Program Amended Implementation Plan, National Grid Multi-Unit Dwelling Programs, PGE 2023 Transportation Electrification Plan, Xcel Energy 2024-2026 Transportation Electrification Plan Public Service Company of Colorado, Southern California Edison Charge Ready 2
[44] ComEd Beneficial Electrification Plan 2 2026-2028, p. 37

with rebates averaging 50%[45] higher for LI communities. Similarly, SCE applies siting criteria to ensure at least 30%[46] of DCFC installations are located within DACs.

Benchmarking and survey results also indicate that utilities are reassessing fleet electrification strategies in response to challenging economics, vehicle availability, and evolving adoption patterns. While fleet electrification, particularly for school buses and medium- and heavy-duty vehicles, remains a priority across many programs, utilities increasingly supplement financial incentives with advisory services, site demonstrations, and technical assistance to address high upfront costs and operational complexity. Of the eight benchmarked utilities, 88%[47] offer supplemental advisory or fleet assessment services to help customers overcome entry barriers. Utilities like Xcel Energy and ComEd also provide substantial rebates and advisory services, including up to $400,000[48] per electric school bus and full coverage for bi-directional charging infrastructure in Colorado, and incentives reaching $200,000[49] for income-qualified applicants in Illinois.

Across the utilities reviewed, several common themes emerged, including expanded income eligibility thresholds for residential programs, prioritization of disadvantaged communities across customer segments, flexibility in charger specification requirements, increased emphasis on public DC fast charging, and targeted fleet support paired with advisory services. These themes were consistently reflected in survey responses, where utilities identified equity-driven program design, flexible technical requirements, and targeted outreach as critical success factors in advancing transportation electrification.

3.2 Participation Framework

Translating EV adoption forecasts (section 2.4.3) into charging infrastructure needs requires a defined set of customer participation segments. Consistent with the structure established in the 2024 TEP, DTEE applies a participation framework that defines customer sub-segments by charger type, installation context, and program eligibility. These refined sub-segments are used

[45] ComEd Beneficial Electrification Plan 2 2026-2028, p. 47
[46] Southern California Edison Charge Ready 2, p. 6
[47] Consumers Energy Transportation Electrification Plan 2024, ComEd Beneficial Electrification Plan 2 2026-2028, Xcel Energy 2024-2026 Transportation Electrification Plan Public Service of Colorado, Consolidated Edison Company of New York, Inc. Electric Vehicle Infrastructure Make-Ready Program Amended Implementation Plan, PGE 2023 Transportation Electrification Plan, Southern California Edison Charge Ready 2 Infrastructure and Market Education Programs, Northern States Power Company (Xcel MN) 2023 Transportation Electrification Plan
[48] Xcel Energy 2024-2026 Transportation Electrification Plan Public Service of Colorado, p. 47
[49] ComEd Beneficial Electrification Plan 2 2026-2028, p. 43

throughout the Market Assessment (section 3.3) to estimate charger demand, utilization, investment requirements, and form the basis for the TEP Portfolio proposals that follow. For the 2026 TEP Refresh, the Company maintained the same core participation categories and updated select market shares and eligibility parameters to reflect observed program performance and stakeholder input.

Table 6 Overview of Customer Sub-Segments

Segment	Customer Sub-Segments	Description of Location or Use Case
Residential	LI	L2 chargers for SFH residents within 200% of federal poverty limit
	Moderate Income	L2 chargers for SFH residents within 201-400% of federal poverty limit
	Non-LI	All other L2 chargers at SFHs
MUDs	LI	L2 chargers at LI MUD housing (e.g., public housing, government-subsidized private housing, etc.)
	Non-LI	All other L2 chargers for MUDs
Public	DAC/rural on-route DCFCs	DCFCs within one mile of a major throughway and in DACs and/or rural areas
	All other on-route DCFCs	All other DCFCs within one mile of a major throughway
Workplace	Public L2	All L2 public charging, including workplace and destination retail locations
Fleet	L2	L2 charging for fleet EVs, typically LDVs
	Other DCFCs	All other DCFCs for fleet EVs including transit and school buses

Another dimension to consider for providing charging market support are the three primary cost categories for charger installation: UMR, CMR, and EV Charger. Definitions and specific examples for these three cost categories are provided in the Figure below.

Figure 10 Charger Installation Cost Category Definitions and Examples

Category	Description	Examples
Utility Make-Ready (UMR)	Upgrades on the utility side of the meter, from the line transformer to the meter	• Upgrading grid-edge infrastructure (e.g., pole top transformer) to support residential EV load • Adding a new service line to support EV chargers in a parking lot
Customer Make-Ready (CMR)	Upgrades on the customer side of the meter, from after the meter to the EV charger stub out	• Installing a larger electrical panel to support an EV charger (residential) • Installing conduit and cable from the panel to the charger stub out (commercial)
EV Charger	The hardware that delivers power to charge the EV	• L2 chargers • DCFCs

The ways in which DTEE ultimately decided to support the above customer subsegments and justification for its proposals are included in the TEP Portfolio sections.

3.3 Market Assessment

The market assessment converts DTEE's EV adoption forecast (Figures 1–2) into the charging infrastructure required across customer segments.

Charging needs are modeled across five customer segments residential, multi-unit dwellings, public on-route DC fast charging, workplace L2 charging, and fleet applications (table below).

Table 7 Overview of Primary Customer Segments and Market Needs

Segment	Customer Description	Market Needs & Key Barriers
1. Residential	Residential customers in detached SFHs, typically with a single electrical panel and dedicated parking	• Overnight charging supports Level 1 or L2 solutions. • Installation costs vary widely and remain a barrier, particularly for LI customers. • Older homes may require panel upgrades or additional make-ready work.
2. MUDs	Commercial customers with buildings that have two or more housing units. Parking may be shared or assigned	• Long-duration charging requires L2 infrastructure. • Installation feasibility varies by building age, parking configuration, and electrical capacity. • Landlord motivation and project complexity are persistent barriers to adoption.
3. Public	Commercial customers as charging operators installing high-power DC Fast chargers for public use on-route along travel corridors (near major throughways)	• Supports long-distance travel and high-turnover use cases. • High installation costs and significant make-ready needs drive investment requirements. • Gaps persist in disadvantaged and rural communities, limiting equitable access.
4. Workplace	Commercial customers owning L2 chargers for public use, either at a destination retail location (e.g., stores and restaurants), or employee use with their personally owned vehicles	• Suited for longer-duration charging at workplaces and destinations. • Installation costs and implementation complexity can limit participation. • Over time, some workplaces may shift toward mixed L2 and DCFC solutions.
5. Fleet	Commercial customers as fleet operators owning chargers for business use. Fleets can be one or more LDVs and/or MHDVs	• Charging needs vary by vehicle type, operating schedule, VMT, and depot characteristics. • Depots, especially for MHDVs, may require substantial electrical upgrades. • Economics remain highly sensitive to grant availability and infrastructure costs.

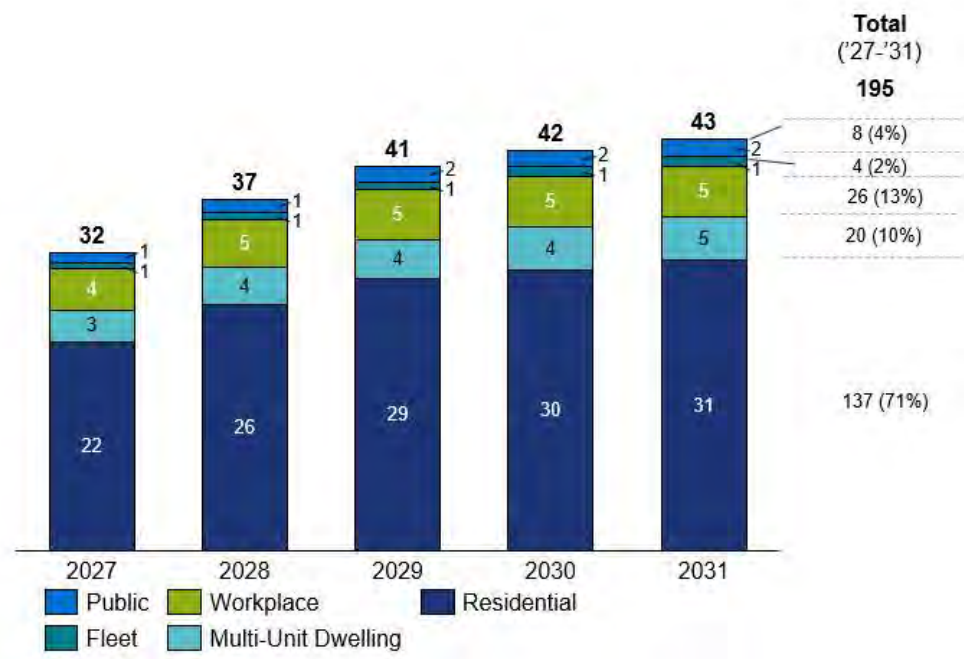
To estimate the number of chargers required in each customer segment, DTEE applies a consistent market-modeling formula that converts the EV adoption forecast into charger needs by segment and charger type, expressed as:

$$\text{Chargers} = \frac{\frac{\text{Number of EVs}}{\text{EVs per Charger Port}} \times \text{Charger Mix}}{\text{Ports per Charger}}$$

For each segment and charger type, this methodology begins by dividing forecasted incremental EVs by the number of EVs served per charging port which is a value that varies by segment, ranging from one EV per port for single-family homes to more than 170 EVs per port for public on-route DCFCs by 2031 as charger utilization increases. Required ports are then allocated between L2 and DCFC equipment according to each segment's expected charger mix. For example, Residential and MUDs are modeled as exclusively L2 installations, public charging is predominantly DCFC, and fleet needs vary by duty cycle, with light-duty fleets using mostly L2 charging while MDHVs and buses require 80–100% DCFC. Finally, ports are converted into chargers by applying a ports-per-charger factor, which ranges from 1.0 for dedicated-port applications such as Residential and school buses, to 1.2 for public charging applications where multi-port equipment becomes more common over time. This integrated calculation ensures charger estimates align with segment-specific charging behavior, evolving utilization patterns, and technology trends across the 2027–2031 TEP horizon.

Based on the baseline EV forecast, approximately 195,000 incremental chargers will be required between 2027 and 2031 (Figure 11). More than 70% of chargers are expected at Residential locations, reflecting customer charging behavior and increasing residential electrification. Public DCFCs represents only about 4% of chargers but accounts for nearly 40% of projected investment, driven by high-power equipment and make-ready needs. Charger segment-specific load impacts are provided in Appendix D.

Figure 11 Forecast of Annual Incremental Chargers Needed in DTEE Service Territory 2027-2031 (thousands)[50]



Next, to quantify the investment required to deploy the chargers identified in the market assessment, DTEE applied updated cost assumptions based on internal project data, industry benchmarks, and expected technology trends. These assumptions reflect anticipated inflation, technology-driven cost declines, and economies of scale achieved through multi-port installations.

DTEE used internal Company data and planning experience to develop cost assumptions by charger segment and type. Inflation rates of 2.6% (2025–2027) and 2.3% (2028–2031) were applied to installation costs, while charger hardware prices were assumed to decline by 3% annually. Economy-of-scale effects were incorporated by reducing hardware costs by 2% and installation labor costs by 5% for every two additional L2 chargers added at a site (10% for DCFC), capped at ten chargers.

These factors result in declining average installation costs for larger sites even as inflation increases labor and materials over time. Program execution also revealed meaningful segment-level differences. Approximately 20% of fleet and 75% of workplace installations require

[50] Differences in totals due to rounding

no service upgrades, reducing expected utility make-ready (UMR) costs. For Residential locations, installation cost variability aligns closely with housing age; newer homes built after 1980 showed significantly lower customer make-ready (CMR) costs and typically avoid early transformer upgrades due to lower homes-per-transformer ratios.

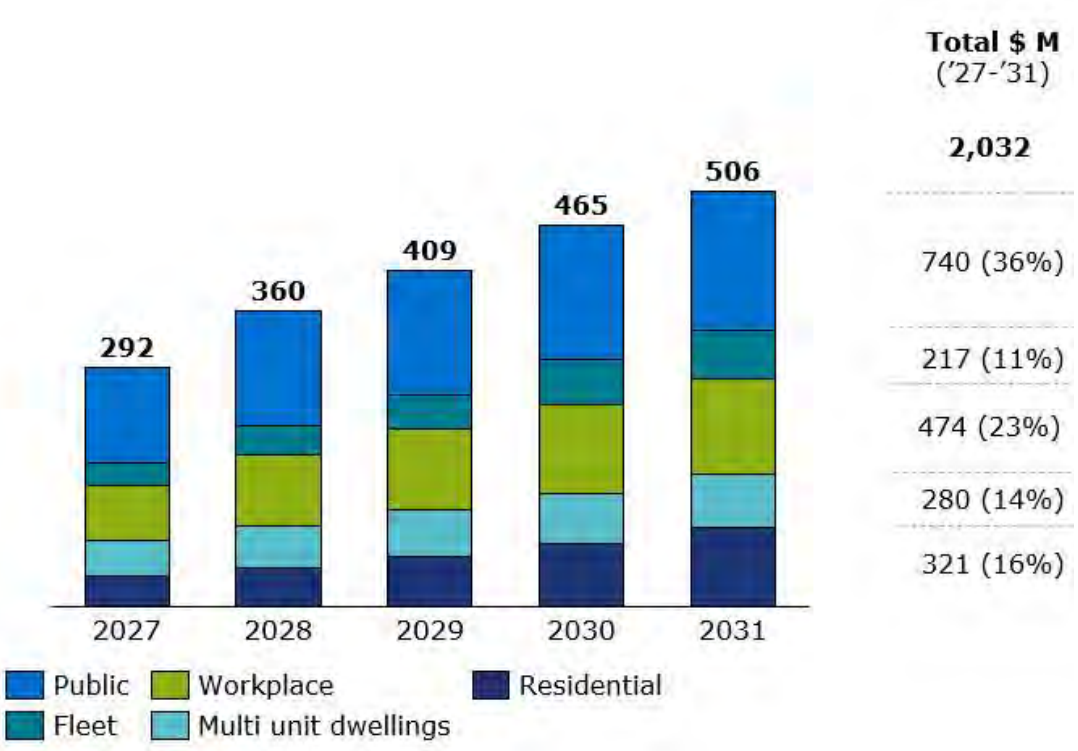
The description and examples of UMR, CMR, and charger costs are included in Figure 10 above (Section 3.2), and the average cost assumptions by cost category can be found in Appendix E.

Under these assumptions, total infrastructure investment required to support forecasted charger deployment exceeds $2 billion from 2027 through 2031. Annual investment increases from approximately $292 million in 2027 to $506 million in 2031, as shown in Figure 12 below.

Although public DCFC represents only 3% of chargers needed, it accounts for nearly 40% of near-term investment due to high equipment costs and substantial UMR requirements. Conversely, Residential chargers, which are over 70% of projected chargers, require only about 16% of the total investment due to comparatively low installation costs.

This infrastructure investment will be supported through a combination of private capital, federal and state funding, site-host contributions, and DTEE utility make-ready investments. The TEP Portfolio (Section 4) outlines the Company's proposed rebate offerings and program implementation strategy, while the Distribution System Planning section (Section 5.1) details expected grid impacts and required system upgrades. Consistent with the Company's 2022 IRP, which was approved with a settlement agreement in the July 2023 Order in Case No. U-21193, these infrastructure cost estimates exclude transmission and generation-related costs.

Figure 12 Total Annual Investment (All Sources) Required for Charging Infrastructure in DTEE Service Territory by Customer Segment ($ millions)



3.4 Stakeholder Engagement

DTEE's TEP Refresh is built on a foundation of robust, transparent, and inclusive stakeholder engagement. Recognizing the expanded scale and impact of the TEP compared to prior pilot programs, DTEE significantly broadened its outreach and deepened its engagement to ensure the plan reflects the diverse needs, priorities, and expertise of Michigan's communities, industry, and policy leaders.

DTEE's engagement process reached across the full spectrum of the EV ecosystem, inviting 142 organizations (up from 110 in the previous TEP) including:

- **EV Industry:** Auto manufacturers, charger manufacturers, network providers, installation companies and other service providers
- **Customer-Facing Organizations:** Municipalities, regional planning organizations, transit agencies, businesses, gas and convenience store owners, car rental companies, and transportation network companies

- **Policy & Advocacy Groups:** MPSC staff, regional and national advocacy organizations, and environmental groups

This diversity ensured that feedback reflected both statewide policy priorities and on-the-ground implementation realities. Of the 142 organizations invited, 64 participated directly, representing a participation rate of nearly 45%. EV Industry and Policy and Advocacy stakeholder group had the largest attendance at 39% respectively, followed by Community Focused stakeholders at 22%. A full list of participating organizations is provided in Appendix F.

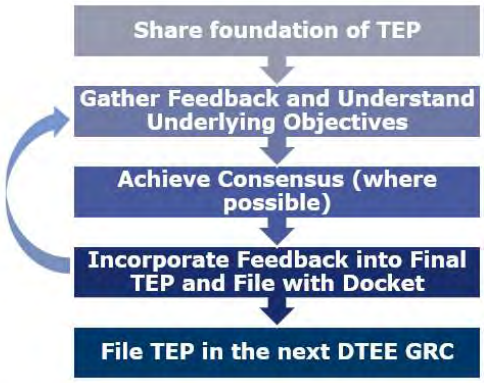
DTEE's engagement strategy was multi-faceted and iterative, designed to invite open dialogue, gather actionable feedback, and integrate stakeholder input at every stage. Key activities included:

- **Ongoing consultation with MPSC staff** to ensure regulatory alignment and transparency
- **Collaboration with** ATE[51], including a benchmarking survey of 13 peer utilities, complemented by the Company's independent TEP benchmarking across eight peer utilities to leverage industry best practices
- **Kick-off and preview webinars** for all stakeholders, introducing the TEP Refresh process and sharing preliminary proposals
- **Breakout meetings by stakeholder group** to discuss segment-specific topics such as installation costs, market segmentation, and investment needs
- **Three targeted surveys** following group discussions, enabling stakeholders to provide detailed input and suggest improvements,
- **Focused BCA sessions** with select stakeholders to review methodology and seek consensus[52] on the quantification of costs and benefits, and
- **Individual follow-up meetings** offered to address specific questions or concerns.

The stakeholder engagement process is visually summarized in Figure 13 below:

[51] Alliance for Transportation Electrification (2025) DTEE TEP Benchmarking Survey [unpublished]
[52] Stakeholders for the benefit-cost analysis discussion included 5 Lakes Energy, CALSTART, Clean Fuels Michigan (CFM), Citizens Utility Board of Michigan (CUB of Michigan), Ecology Center, Earthjustice, Environmental Law & Policy Center (ELPC), Michigan Energy Innovation Business Council (MEIBC), Michigan Department of Licensing and Regulatory Affairs (LARA), Michigan Public Service Commission (MPSC) Staff, Natural Resources Defense Council (NRDC), Sierra Club, and Vote Solar

Figure 13 Process to Incorporate Stakeholder Feedback into TEP Refresh



The Company gave a preview of proposed TEP programs to stakeholders in November and December 2025, including outreach sessions held on November 17 and 19 at 1:00 p.m. EST and on December 9 at 6:00 p.m. EST to ensure broad participation (see Appendix F for the full attendee list). Following these sessions, the Company sent a survey to participants, receiving 13 responses from a diverse group of organizations including policy advocates, industry representatives, community groups, and local government. The survey provided valuable insights into stakeholder priorities, consensus areas, and constructive suggestions for program improvement.

Stakeholder feedback directly shaped final key program elements, including:

- Expansion of eligibility thresholds for rebates
- Tiered incentives
- Prioritization of MUDs and DACs
- Commitment to funding flexibility and program adaptability

The stakeholder engagement process provided valuable feedback, that was largely aligned with consensus in the following areas:

- **Equity and Expanded Eligibility:** Stakeholder feedback showed broad support for expanding EV rebate eligibility beyond low-income households in light of recent policy and funding changes. Survey respondents and webinar participants emphasized prioritizing low- and moderate-income households, MUDs, and DACs, while also underscoring the importance of balancing affordability and ratepayer protections as eligibility expands.

- **Support for Fleet and Public Charging Programs:** Every survey respondent supported continued fleet DCFC rebates for transit, school bus, and private fleets, citing their public-facing and equity benefits. Webinar participants also affirmed the importance of maintaining and, where possible, expanding support for fleet and public DCFC programs. While stakeholders expressed differing perspectives on the appropriate scale and duration of public DCFC incentives, feedback largely centered on how and where investments should be prioritized, such as targeting underserved corridors, DACs, and rural areas, rather than whether public DCFC support should continue.
- **Education, Outreach, and Advisory Services:** Stakeholders consistently rated education and outreach as "extremely important" or "important" for driving EV adoption and program participation. Stakeholders praised DTEE's efforts and encouraged even more proactive outreach, dealership education, and accessible materials. Advisory services for fleets and multifamily properties emerged as an area of near-universal agreement across stakeholder groups, with participants describing these services as low-cost, high-value tools that reduce project risk, improve implementation outcomes, and help ensure that rebate investments translate into successful installations and beneficial load.
- **Funding Flexibility and Program Adaptability:** Stakeholders supported funding flexibility across rebate programs and multi-year implementation, emphasizing the importance of maintaining portfolio-level affordability benefits while responding to changing market conditions and adoption trends.

Identifying those areas of alignment provided the foundation upon which DTEE built the TEP Refresh. Stakeholder engagement also surfaced areas of differing opinion, which DTEE has documented and will continue to address through ongoing dialogue.

In addition, select stakeholders raised questions regarding the appropriate role of the TEP in addressing geographic public charging coverage, particularly for public DCFCs in rural areas. Some stakeholders encouraged the Company to incorporate more prescriptive, geographic-specific analyses of public DCFCs coverage into the TEP, including identifying specific corridors or locations to address perceived gaps. The Company agrees that understanding geographic coverage gaps is an important planning consideration and has considered statewide policy objectives, academic research, and market analyses when determining the appropriate scale of public DCFC investment reflected in this TEP Refresh. However, the TEP does not prescribe specific charger locations. Consistent with Commission guidance, public charging deployment under the TEP is site-host driven, with projects advancing

through applications evaluated against Commission approved eligibility criteria. To balance market flexibility with cost discipline, the Company relies on program guardrails such as tiered incentives, technical requirements, market-share limits, and portfolio-level benefit-cost analysis rather than utility directed siting. The Company will continue to encourage site hosts to consider locations that address identified gaps and will monitor deployment and utilization to inform future TEP updates.

A small number of stakeholders advocated for legislative or tariff-based approaches requiring utilities to fund UMR infrastructure and waive CIAC, with costs recovered through general rates. The Company considered these views but did not reflect such an approach in the TEP Refresh, as previous UMR and CIAC support offered through the Company's programming was terminated based on Commission direction[53]. Consistent with the Commission orders and the approved TEP framework, the Company relies on targeted charger installation incentives supported by defined program guardrails, rather than mandatory site-specific infrastructure cost recovery that could shift costs to customers without a demonstrated BCA justification for the Company's customers.

In addition to the topics discussed above, stakeholders raised a range of perspectives on program design, eligibility, and implementation, summarized below:

- **Rebate Levels and Market Segments:** Several respondents felt that rebate and market share levels for moderate-income SFH, public DCFC, and fleet segments should be increased, while a few stakeholders raised concerns about the cost of such offerings and suggested reducing rebates for higher-income segments.
- **Definition and Thresholds for Income-Based Eligibility:** Some stakeholders recommended broadening the definition of "low-income" and "moderate-income" to reflect current economic realities, suggesting eligibility up to 400% FPL for low-income and up to 600% FPL for moderate-income.
- **Non-LI Rebates and Managed Charging Participation:** Some stakeholders suggested tying non-LI SFH rebates to managed charging enrollment or additional rate requirements, while others emphasized customer flexibility and ease of participation.
- **Process Improvements:** There were suggestions for more proactive outreach, dealership education[54], and streamlined application processes, as well as enhanced cost-comparison tools and "one-stop shop" resources for customers. Stakeholders also

[53] January 2025 Rate Order in Case U-21534 (page 345)
[54] DTEE does provide resources and signage to dealerships currently

emphasized the value of increased transparency and predictability around interconnection timelines, energization, and rebate processing to reduce project risk and improve market confidence.

- **Program Prioritization and Allocation of Funds:** Stakeholders expressed differing views on how funds should be prioritized with some preferring first-come, first-served, while others advocated for prioritizing equity, geographic diversity, or specific customer segments.

DTEE recognizes the value of these diverse perspectives and is committed to maintaining program adaptability and continuous improvement as market conditions evolve. The Company views ongoing stakeholder engagement as a critical program-optimization tool that supports data-driven decision-making, regulatory alignment, and sustained customer trust.

Stakeholder sentiment on the specific TEP proposals is provided throughout the rest of this report, as applicable. Overall, surveyed stakeholders overwhelmingly indicated DTEE's engagement approach met expectations, with 92%[55] of respondents (12 out of 13) indicated they were "satisfied" or "very satisfied" with DTEE's stakeholder engagement process; the remainder were neutral. No respondents indicated dissatisfaction.

DTEE will continue to engage stakeholders through annual status reports, future bi-annual TEP refreshes, and targeted outreach as new challenges and opportunities arise, ensuring the plan remains responsive, effective, and aligned with Michigan's clean energy and mobility goals.

4 TEP Portfolio

4.1 Residential

DTEE's updated market assessment confirms that Residential chargers will remain the foundation of Michigan's EV charging landscape, representing over 70% of incremental chargers needed between 2027 and 2031 and accounting for approximately 41% of projected EV-specific electric load. Access to reliable home charging is a key driver of EV adoption, enabling fuel pricing near $1.44 eGallon equivalent[56] and supporting EV affordability. While Residential charger[57]

[55] DTE Electric (2025) TEP stakeholder survey [unpublished]
[56] Using the eGallon-methodology-final (energy.gov) and assuming 28.2 miles/gallon, 0.3368 kilowatt-hours/mile, and 15.2 cents/kilowatt-hour off-peak pricing of D1.2 electric rate Jun - Oct
[57] See Appendix E

installation costs average approximately $2,030, actual costs vary widely, ranging from $300 to $6,800, particularly in older homes requiring electrical upgrades. Lessons learned from the Company's 2023 Home Charger Installation pilot underscore that these installation costs pose a significant barrier, especially for lower-income households.

As federal EV purchase incentives have phased down and state registration fees have increased, the financial barriers to EV adoption including charging installation costs, and customer understanding of home charging, remain material barriers for working families. In this context, utility-led incentives play a complementary role in helping reduce charging installation and upfront cost barriers that can influence EV affordability for a broader segment of Michigan households.

The legacy Home EV Charger Rebate[58] was designed for income-eligible (i.e., no more than 200% of FPL) residential customers to help cover the cost of a L2 charger and installation when they buy or lease an EV. Through 2025, the program covered the full costs for 294 qualified customers out of the available funding for 1,421 rebates, with income exceeding the eligibility threshold identified as the primary driver for application rejection. This participation outcome represents an initial data point suggesting that the current income eligibility structure constrained program reach, with just under 16 percent of available funding reaching qualified participants. Benchmarking and stakeholder feedback indicate that limited, targeted incentives particularly when paired with education at the point of rebate delivery, can help address charging installation barriers and improve customer understanding of rates and charging behavior.

Stakeholder engagement, including survey responses, webinars, and direct feedback, showed broad support for expanding eligibility beyond 200% of the FPL. In fact, 100%[59] of the stakeholders surveyed agreed that offering EV rebates beyond low-income households is appropriate given recent policy and funding changes. Stakeholders emphasized the need to reflect economic realities and ensure incentives reach working families:

- "…., I believe the current thresholds defining 'low-income' (<200% FPL) and 'moderate-income' (200–400% FPL) households in many of DTE's rebate programs are too restrictive and should be reconsidered. A more inclusive approach that more accurately reflects the economic realities would expand eligibility so that: Low-income households are defined up to 200–400% of FPL, and Moderate-income households are defined in the 400–600% of FPL range. I think DTE should make it a point to reach out to

[58] DTEE Electric Vehicle Resources available at https://www.dteenergy.com/ev
[59] DTE Electric (2025) TEP stakeholder survey [unpublished]

include low- AND moderate-income households in rebates and raise the bar for eligibility so that legitimate working families have a more compelling case to adopt EVs. … Expanding eligibility is not only more fair, but also essential to ensuring the incentives achieve their intended impact."

- "Absolutely. While targeting low-income households is incredibly important, to more readily realize the benefits that EVs have to offer, reducing barriers to entry across all Michigan households is essential."
- "Supporting individuals who may not otherwise be eligible for a low-income subsidy is the best way to ensure meaningful, continued, and enduring EV penetration."

Additionally, benchmarking with peer utilities, including the ATE-facilitated survey of 13[60] utilities, shows that about 50% of peer utility TEPs offer rebates beyond LI households, and 86% use income thresholds above 200% FPL or do not use FPL at all. This industry trend underscores the importance of a more inclusive approach to maximize program impact and equity. Webinar participants and industry stakeholders echoed these findings, noting that expanding eligibility is important to address charging installation costs, reflect current economic conditions, and support broader participation in EV charging programs, consistent with stakeholder priorities and peer utility practices.

In response to these compelling arguments and broad-based feedback, DTEE is proposing a tiered Home EV Charger Rebate structure to expand access and drive equitable adoption:

- **At and under 200% FPL** (aligns with other DTE LI programs; approximately $64,000 for a four-person household[61]): Full cost of installation covered (average rebate ~$2,000); maintain 100% market share targeted
- **201–400% FPL** (approx. $128,000 for a four-person household): Fixed $1,500 rebate; 100% market share targeted
- **Non-LI households:** Fixed $500 rebate; 15% market share targeted

Eligibility requires proof of EV purchase or lease and installation of an ENERGY STAR-certified or manufacturer-approved charger (≤11.5 kW).

[60] Alliance for Transportation Electrification (2025) DTEE TEP Benchmarking Survey [unpublished]
[61] E.g., DTE Energy Efficiency Assistance Program and DTE Shutoff Protection Plan; Poverty Guidelines | ASPE (hhs.gov)

DTEE proposes to support 100% of projected adoption among Moderate-Income (MI) households (201–400% FPL) because these working families face substantial, non-trivial installation barriers (e.g., panel upgrades, older home wiring) in the absence of federal EV tax credits, and do not qualify for traditional low-income assistance programs. Stakeholder engagement during the TEP Refresh showed broad support for expanding eligibility beyond 200% FPL, particularly for MI households that experience meaningful financial and installation barriers. Stakeholder feedback further suggests that these customers are especially responsive to financial incentives, where targeted rebates can materially influence adoption outcomes. The Company's benchmarking of peer utilities further supports this approach, as many TEPs nationally extend rebate eligibility beyond traditional low-income thresholds, including to MI households, to help address cost barriers not fully captured by low-income definitions. Aligning eligibility with customer segments that are expected to be more responsive helps inform how rebate dollars can be directed where they are most effective, while keeping the program equity-first and cost-effective by concentrating dollars where rebates materially change outcomes.

At the same time, DTEE proposes a modest rebate for customers above 400% FPL targeted to approximately 15% of the market, consistent with the Company's historical participation rate when income tiers were not applied. Targeting market support at 15% maintains universal program access thus avoiding a design that excludes customers who will help drive early adoption. This limited participation level directs close to 60% of program funding to LI and MI customers, where rebates have the highest incremental impact, and reflects the Commission's focus on ensuring affordability benefits for all DTEE customers. A 15% participation target is consistent with historical demand, balancing the risk of being overly restrictive if support is too limited with the risk of over-subsidizing customers who have historically adopted EVs without incentives. This approach is also consistent with approved residential EV charging rebate designs elsewhere in Michigan, providing DTEE customers with a comparable opportunity to access modest utility support for home charging while preserving a primary focus on low- and moderate-income households.

DTEE estimates that on average around 6.1% of forecasted EV sales during the TEP timeframe will be to residential customers meeting the low- and moderate-income threshold. The proposed program aims to support approximately 1,365 and 7,315 rebates for Low-Income and Moderate-

Income Residential customers respectively, totaling $13.7 million[62] in investment. The income eligibility threshold will be monitored over time, and any potential adjustments would be considered as part of a future TEP filing, based on evolving market conditions. If upfront EV costs remain high, DTEE may revisit the threshold to ensure meaningful support for Southeast Michigan's households.

For non-low income (non-LI) residential customers, the proposed program aims to support 19,265 rebates from 2027 through 2031 totaling $9.6 million in investment. Table 8 summarizes the annual rebate targets and associated combined program costs.

Table 8 Proposed TEP Residential Charger Rebate Targets

Rebates	2027	2028	2029	2030	2031	Total
LI	220	260	285	295	305	1,365
MI	440	1,285	1,605	1,860	2,125	7,315
Non-LI	**3,215**	**3,665**	**4,020**	**4,130**	**4,235**	**19,265**
Total Residential	**3,875**	**5,210**	**5,910**	**6,285**	**6,665**	**27,945**
Cost ($M)	**2.7**	**4.3**	**5.0**	**5.4**	**5.9**	**23.3**

4.2 Multi-Unit Dwellings

Multi-unit dwellings (MUDs) remain an underserved segment in Michigan's EV charging landscape. Reliable and affordable charging access for MUD residents is critical to accelerating EV adoption and achieving statewide electrification goals.

The latest TEP Refresh market analysis estimates that approximately 32% of its customers reside in MUDs, and that this segment will account for over 10% of incremental chargers needed between 2027 and 2031, as well as approximately 18% of projected EV-specific electric load. These findings underscore the importance of targeted MUD charging solutions to support equitable electrification outcomes.

[62] Assuming an average rebate of approximately $2,000 (would not exceed actual costs); difference to total cost from Appendix E due to average $270 of non-CIAC utility make-ready cost funded by the utility (business as usual)

The 2024 TEP[63] established a two-track approach for multifamily properties, consisting of a full-cost rebate for LI MUDs and a partial rebate for non-LI MUDs, to address the persistent barriers that have historically constrained access to overnight charging for MUD residents. Landlords often lacked incentives to invest in EV infrastructure, while installation costs remained the largest obstacle.

In alignment with the Commission's January 2025 Order, DTEE's MUD program allows applicants to self-attest to tenant interest when requesting a MUD charger rebate. This approach was implemented during 2025 program execution to reduce administrative burden on property owners, address documented landlord participation barriers, and accelerate deployment timelines for multifamily charging infrastructure. Program experience in 2025 confirms that self-attestation supported strong application volume while maintaining program integrity through standard eligibility verification and post-installation reporting requirements.

Building on the foundation of the prior TEP design, the TEP Refresh incorporates first-year execution outcomes and recent policy shifts to better align design with observed market conditions and stakeholder guidance. Through 2025, installation costs remained the largest obstacle, driven by make-ready work such as trenching and electrical upgrades. The average cost of installation per port was approximately $13,780, with significant site-specific variability.

Over 70% of all MUD rebate applications ran through the EGLE grant program[64] coordination, where typical multifamily installations progress on approximately 5-month timelines when participating in both EGLE and DTEE rebate programs. EGLE's Multifamily request for approval (RFP) allocated $5M in grant funding and has approved $3.1M through early December 2025, frequently stacking with the Company's rebates to cover full installation at qualifying sites.

In 2025, program activity demonstrated strong interest from multifamily applicants, though completion rates varied by customer sub-segment:

- For LI MUDs, $14,400 per charge port rebates were offered to help cover the entire cost of the installation, with 22 rebates issued and 154 approved, but less than 15% of installations completed due to either timing issues associated with EGLE grant participation or unexpected installation delays.

[63] DTEE 2024 TEP at https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/0688y00000BUT09AAH

[64] Clean Fuel and Charging Infrastructure Program available at https://www.michigan.gov/egle/about/organization/materials-management/energy/rfps-loans/clean-fuel-and-charging-infrastructure-program

- For non-LI MUDs, $5,000 per charge port rebates were offered, with 98 rebates issued and 1,222 approved. This amounted to just under 10% of installations being completed due to either timing issues associated with EGLE grant participation or unexpected installation delays as noted with LI MUDs as well.

Benchmarking against peer utilities through the ATE-facilitated survey of 13 utilities revealed that 10 utilities[65] have active multifamily programs, and only one utility has a minimum requirement of 9.6kW EV Supply Equipment (EVSE) output, with most having even lower or no minimum.

In direct response to this first-year experience and peer utility benchmarking, DTEE proposes reducing the EVSE kW output requirement for rebate eligibility from 11.5 kW to 9.6 kW, to enable more ports on existing services and broaden tenant access.

For the 2027–2031 period, DTEE proposes to maintain a $14,400 per-port LI MUD rebate designed to cover full installation costs and target 100% of the LI MUD sub-segment and a $5,000 per-port non-LI MUD rebate targeting 42% of the non-LI sub-segment. These targets translate to approximately 1,280 LI MUD rebates and approximately 8,000 non-LI MUD rebates with a combined program cost of approximately $58.4 million over 2027–2031 as shown in Table 9 below.

Table 9 Proposed TEP Business MUD Charger Rebate Targets

Rebates	2027	2028	2029	2030	2031	Total
LI	100	230	270	320	360	1,280
Non-LI	1,350	1,540	1,610	1,730	1,770	8,000
Total	**1,450**	**1,770**	**1,880**	**2,050**	**2,130**	**9,280**
Cost ($M)	**8.2**	**11.0**	**11.9**	**13.3**	**14.0**	**58.4**

DTEE will also align utility rebate funding cycles with the demonstrated five-month installation timelines for EGLE-coordinated projects and continue to strengthen advisory services to lower customer burden. In 2025, advisory activity logged 60 multifamily interactions, with approximately 50% of advised properties applying into the program. Through the MUD program, DTEE offers

[65] Alliance for Transportation Electrification (2025) DTEE TEP Benchmarking Survey [unpublished]; American Electric Power, Duke Energy, Portland General Electric, Xcel Energy, Salt River Project (SRP), Ameren Illinois, Southern California Edison (SCE), Puget Sound Energy, Tucson Electric Power, Seattle City Light

free advisory services that help customers navigate the rebate process, find additional funding opportunities, and address application and installation questions..

These proposals have received positive reactions in DTEE's stakeholder engagements. For example, during the December 8 webinar session, stakeholders noted that reducing the kW threshold "opens [MUDs] to a larger market share."

Collectively, these adjustments such as technical eligibility updates, sustained LI coverage, targeted non-LI support, schedule alignment with grant cycles, and strengthened advisory services, are designed to accelerate charger deployment, improve EV affordability, and ensure reliable, equitable access to at-home charging for MUD residents across DTEE's service territory while maintaining data and performance requirements to support beneficial load integration into the grid.

4.3 Public On-Route DC Fast Charging

Public On-Route DC Fast Charging supports long distance travel, and corridor connectivity, while reducing range anxiety which is a persistent barrier to EV adoption. Within DTEE's service territory, publicly accessible DC fast charging complements residential and workplace charging, particularly for customers without reliable home charging and for inter-regional travel. As discussed in Section 2.4.7, public charging deployment continues to face cost, coordination, and siting challenges that influence infrastructure availability and utilization.

Through the TEP EV programs, DTEE provides make-ready rebates to support the deployment of Public On-Route DCFC infrastructure in response to the market barriers identified in Section 2.4.7. The program includes two rebate tiers: sites located in disadvantaged or rural communities and all other non-disadvantaged locations. Qualified site hosts receive a rebate of $70,000 per DCFC port in disadvantaged or rural communities, and $50,000 per port in non-disadvantaged locations. Disadvantaged community (DAC) eligibility is determined using the Michigan Department of Environment, Great Lakes, and Energy's (EGLE) Michigan Economic Justice (MiEJ) screening tool, with sites qualifying for the higher rebate tier if located in a census block

group with a MiEJ percentile score of 75 or greater. Based on AFDC data, the Company estimates that 654 public DCFC ports are installed across 188 sites[66] within its service territory.

The TEP Refresh market analysis estimates that public charging will account for just over 4% of incremental chargers needed between 2027 and 2031, while representing approximately 16% of projected EV-specific electric load due to the higher power levels and utilization associated with DCFC equipment. Public On-Route DCFC represents the largest share of TEP program investment, accounting for approximately 36% of total TEP costs over the 2027–2031 period. This investment profile reflects the capital-intensive nature of DCFC installations, which frequently require substantial electrical upgrades and high-power equipment.

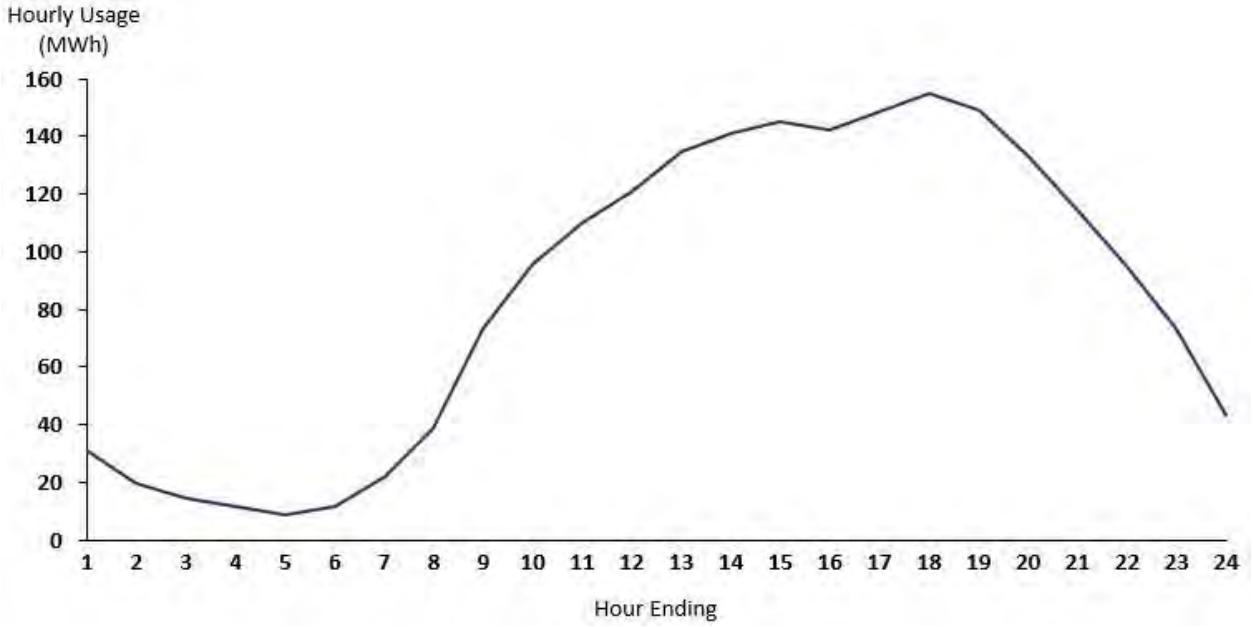
As of year-end 2025, DTEE had approved 223 Public On-Route DCFC rebates for sites located in DACs, with 44 installations completed, and an additional 297 rebates for non-DAC sites, with 41 installations completed. The average total installation cost for a DCFC site was approximately $188,000.

In addition to tracking infrastructure availability, DTEE collects usage data for Public On-Route DCFC installations supported through the TEP. All TEP sites are served by dedicated DTEE meters installed for the purpose of measuring EV-specific electricity consumption. This metering provides full visibility into 8,760-hour charging load profiles and enables analysis of real-world usage patterns and system impacts.

In 2025, public DCFC sites installed under the TEP consumed approximately 2.03 gigawatt-hours (GWh) of electricity. Figure 14 presents the aggregated hourly load profile for these installations, illustrating observed charging behavior across all monitored Public On-Route DCFC sites during the year.

[66] Alternative Fuels Data Center: Alternative Fueling Station Locator (energy.gov) available at https://afdc.energy.gov/stations#/analyze?access=public&access=private&region=US-MI&fuel=ELEC&ev_levels=dc_fast&ev_connectors=J1772&ev_connectors=J1772COMBO&ev_connectors=CHADEMO&show_map=true

Figure 14 Public On-Route DCFC Load Profile 2025



For the 2027–2031 period, DTEE proposes to maintain the current tiered rebate structure: $70,000 per-port for DAC and rural communities and $50,000 per-port for non-DAC sites, each targeting a 40% market share[67] consistent with the barriers and equity considerations described in Section 2.4.7. These targets translate to approximately 365 rebates in each sub-segment, for a total of 730 rebates and a combined program cost of approximately $43.8 million over 2027–2031, as shown in Table 10 below.

Table 10 Proposed TEP Business Public Charger Rebate Targets

Rebates	2027	2028	2029	2030	2031	Total
DAC and Rural	55	70	75	80	85	365
Non-DAC and Rural	55	70	75	80	85	365
Total	110	140	150	160	170	730
Cost ($M)	6.6	8.4	9.0	9.6	10.2	43.8

[67] Public On-Route DC Fast Charging proposal of 40% market share is informed by the MSU EV Charging Study published in March 2026, available at https://www.michiganbusiness.org/contentassets/6b01bcf7019a475ab1e1294808e543c0/ev-charging-infrastructure-study_phase-2_ofme.pdf

DTEE's approach is informed by benchmarking with peer utilities and national best practices. The ATE benchmarking survey of national utilities found that most respondents (67%[68]) use tiered rebate systems to incentivize charger deployment in rural and low-traffic areas, and that DTEE's proposed 40% market share target is consistent with prevailing practices.

Stakeholder engagement has been robust and broadly supportive of DTEE's public charging strategy. During the December 2025 stakeholder webinar, participants emphasized the importance of public DCFC in enabling corridor travel, addressing range-limited use cases, and closing gaps in the existing charging network, particularly for fleets and underserved areas. Stakeholders noted that DCFC serves as a critical backstop even for customers who primarily rely on L2 charging and highlighted the importance of strategically filling gaps along major trunklines to improve statewide coverage.

Stakeholder survey[69] respondents also highlighted the need for continued investment in public DCFC, particularly in rural and DACs, and expressed support for tiered rebate structures as an equitable and market-responsive approach. Stakeholder questions and comments emphasized the importance of addressing corridor gaps, navigating uncertainty associated with potential changes in federal funding such as NEVI, and recognizing higher costs at DAC and rural sites. Collectively, this feedback supports the continued use of tiered incentives to improve corridor coverage and support customer confidence in the public charging network.

DTEE's approach is designed to maximize the impact of utility investment and complement available federal and state funding, such as NEVI. The program's flexibility allows for adjustments in response to market dynamics and stakeholder input, ensuring that DTEE remains responsive to evolving needs and regulatory expectations.

4.4 Workplace Charging

Workplace charging supports public charging access at workplaces and destinations where vehicles are parked for extended periods. While the original TEP filing in 2024 did not include a dedicated program for Public L2, the Commission's January 2025 Order in Case No. U-21534, directed DTEE to offer rebates for public L2 chargers, including workplace and retail locations.

[68] Alliance for Transportation Electrification (2025) DTEE TEP Benchmarking Survey [unpublished]; American Electric Power, Portland General Electric, Xcel Energy, Southern Company, Southern California Edison, Puget Sound Energy, Tucson Electric Power, Settle City Light

[69] DTE Electric (2025) TEP stakeholder survey [unpublished]

DTEE's Public Level 2 Workplace program responds to the public charging market conditions identified in Section 2.4.7, including cost and site-host participation challenges affecting public charging deployment.

DTEE responded by designing and launching the Workplace and Retail EV Charger Rebate program alongside other TEP initiatives, offering a $2,500 per port rebate. To qualify, customers must install the charger within DTEE's service territory, maintain it for at least five years, install a separate meter dedicated to the charger, commit to 97% charger uptime, and meet requirements for lighting, public accessibility, and ADA compliance where applicable. While the Commission ordered DTEE to offer these rebates, it did not authorize incremental funding. As such, DTEE initially reallocated funding from non-DAC/non-Rural On-Route DCFC rebates to support L2 Workplace rebates, which was ultimately approved by the Commission in the February Order in Case No. U-21860.

Despite these efforts, DTEE's Workplace program has experienced lower than expected engagement, consistent with the public charging cost challenges described in Section 2.4.7. As of 2025, 67 L2 ports have been approved and 4 installed, with installation costs ranging from $2,000 to $19,530 per site and an average of $12,000 per site. Many prospective applicants indicated that the previous rebate amount was insufficient to offset installation costs.

Benchmarking through the ATE survey of 13 peer utilities with Public L2 programs found that only two utilities had a minimum charger output requirement, all set at 6.6 kW or lower. Nationally, utilities such as Con Edison and ComEd have shifted away from rigid kW requirements for Public L2 chargers, focusing instead on accessibility, reliability, and equity. Con Edison's[70] PowerReady program bases Public L2 incentives on percentage of make-ready costs (up to 90–100%) with no minimum kW requirement, focusing instead on public accessibility. Similarly, ComEd[71] offers flat per-port rebates ($5,000–$7,500) without a kW threshold, prioritizing equity (70% budget for LI Communities / EIEC), reliability (97% uptime), and ENERGY STAR® certification rather than charger capacity. Informed by benchmarking and program performance, DTEE implemented two key changes:

- Removal of the minimum kW requirement for eligible L2 chargers through the current TEP 2026 programming

[70] Consolidated Edison Company of New York, Inc. Electric Vehicle Infrastructure Make-Ready Program Amended Implementation Plan 2024. p. 9-10
[71] ComEd Beneficial Electrification Plan 2 2026-2028. p 43

- A proposed increase in the Workplace rebate from $2,500 to $3,750 per port for the 2027-2031 TEP Refresh

These changes translate to approximately 1,125 rebates targeting approximately 4% of Workplace charger deployments and with a program cost of approximately $4.2 million over 2027–2031, as shown Table 11 below.

Table 11 Proposed TEP Workplace Charger Rebate Targets

	2027	2028	2029	2030	2031	Total
Rebates	195	225	235	235	235	1,125
Cost ($M)	0.7	0.8	0.9	0.9	0.9	4.2

Stakeholder discussions during the roadshow events and surveys have strongly supported these actions, with survey respondents and webinar participants emphasizing that higher rebates and flexible technical requirements are essential for market growth.

4.5 Fleet Charging

Fleet electrification provides community and operational benefits across multiple vehicle types such as school buses, transit vehicles, municipal fleets, and other commercial operations. Although fleet chargers represent only about 2% of incremental chargers required between 2027 and 2031, they account for approximately 6% of projected EV-specific electric load in DTEE's service area due to higher-power charging requirements and diverse duty cycles across light-, medium-, and heavy-duty vehicles.

Over the past year, fleet electrification momentum has been significantly shaped by changes in federal and state funding availability. The cancellation of EPA Clean School Bus grant awards in 2025, coupled with reduced federal support for transit and MHDV electrification, dampened demand for both school bus and mass-transit charging infrastructure. These policy shifts have been especially challenging for transit agencies, which have faced greater financial hurdles and, as a result, submitted no applications for DTEE's Mass Transit DCFC rebates through 2025. School bus electrification activity continued but slowed materially, with 15 approved rebates and 3 completed installations through 2025. Across the fleet segment, customers consistently noted

rising installation and make-ready costs as persistent barriers to progress, a trend also reflected in stakeholder feedback collected through the 2025 roadshow sessions.

To directly address these increasing costs and maintain alignment with peer utilities nationwide, DTEE proposes a targeted redesign of fleet rebate offerings for the 2027–2031 TEP Refresh. For school buses, the Company recommends retaining the tiered rebate design introduced in prior filings while increasing the rebate amount for each kW tier. These updates reflect current cost realities and align with benchmarking and stakeholder feedback for school bus electrification. The revised tiered structure is shown in the table below.

Table 12 Proposed School Bus Fleet DCFC Tiered Rebates

DCFC Capacity Output (kW)	Prior Rebate Amount ($)	Revised Rebate Amount ($)
24	$12,000	$17,000
50	$18,000	$26,000
62.5	$25,000	$36,000
100	$30,000	$43,000
150	$70,000	$100,000

Stakeholders emphasized the importance of continuing to support school bus and transit fleets, describing these investments as essential for community health and mobility. Participants in DTEE's November 17 stakeholder session reinforced the value of fleet electrification, noting that financial support and advisory services remain "very useful" and that losing such support would significantly hinder progress.

Beyond school buses, DTEE also provides L2 and DCFC rebates for a variety of private and commercial fleet operators. As of year-end 2025, the Fleet L2 program had 146 approved rebates and 115 installations. The Fleet Other DCFC program had 20 approved rebates and 20 completed installations. These outcomes underscore the continued need for financial support across fleet segments, as customers in both programs cited rising installation and make-ready costs as key challenges.

For the 2027–2031 TEP Refresh, DTEE proposes to apply the increased School Bus DCFC tiered rebates shown above (Table 12), increase Transit DCFC rebates from $70,000 to $100,000, offer a rebate up to $25,000 for Fleet Other DCFC installations, and increase the Fleet L2 rebate from $2,500 to $5,000 per charging port. These incentives strike a balance between supporting cost-burdened customers and adhering to portfolio-level guiderails related to affordability benefits and positive BCA. Under DTEE's 2027–2031 market share targets, this proposal supports approximately 730 Fleet L2 rebates, 10 Fleet Other DCFC rebates and 45 combined Transit and School Bus DCFC rebates. In total, the Company anticipates offering 785 fleet rebates during the 2027–2031 timeframe, with an estimated total program cost of $6.2 million, as shown in the table below.

Table 13 Proposed Fleet Charger Rebate Targets

	2027	2028	2029	2030	2031	Total
Fleet L2	110	135	150	165	170	730
Fleet Other DCFC	1	2	2	2	3	10
Transit + School Bus DCFC	2	3	7	14	19	45
Total Rebates	113	140	159	181	192	785
Cost ($M)	0.6	0.9	1.2	1.6	1.9	6.2

In addition to financial incentives, advisory services remain a cornerstone of DTEE's fleet support strategy. Through 2025, fleet advisory offerings—including fleet electrification assessments, total cost of ownership analyses, rate education, and infrastructure planning—received strong and positive feedback. Stakeholders continue to highlight the importance of advisory support in navigating fleet transitions, with one noting during the 2025 sessions that the advisory services are "very useful and would hate to see that support go away."

DTEE's updated fleet program design reflects lessons learned, industry benchmarking, and stakeholder priorities. The proposed rebates recognize the financial challenges associated with early-stage fleet electrification while maintaining alignment with the TEP guiding principles related to affordability benefits, equity, and practical market responsiveness. Collectively, these fleet investments will facilitate the transition toward cleaner buses, municipal fleets, and commercial

operations across Southeast Michigan, delivering public health benefits, reducing emissions, and strengthening long-term customer and community value.

4.6 Key Lessons Learned and Implementation Considerations

The TEP Refresh reflects lessons learned from Charging Forward and the first year of TEP execution, together with considerations for ongoing implementation and monitoring.

Key observations and resulting implementation considerations include:

- Installation costs remain the primary barrier across customer segments, reinforcing the need for calibrated rebate tiers and continued make-ready support;
- Multifamily deployment timelines are influenced by coordination with external funding sources and site readiness, supporting flexible program administration and funding allocation;
- Public DCFC projects face higher capital, interconnection, and make-ready requirements, informing site-host targeted siting strategies and market share limits;
- Fleet electrification interest is sensitive to grant availability and infrastructure costs, justifying continued advisory services and selective infrastructure support; and
- Program monitoring, IT capabilities, and annual reporting enable DTEE to adjust program elements within Commission-approved investment levels and benefit-cost guardrails, while ensuring portfolio-level affordability benefits.

These lessons and considerations collectively informed the program designs described in Sections 4.1–4.5.

4.7 Rebate Portfolio Summary

The proposed TEP programs achieve DTEE's guiding principles by facilitating charger deployment while ensuring affordability benefits for all DTEE customers at the portfolio level, closing charging gaps and improving economics of electrification in the near-term, and promoting equity with a focus on LI customers and DACs.

Consistent with the Commission's February 2026 Order, the proposed TEP rebate portfolio reflects the continuation of regulatory asset treatment previously approved for TEP rebate expenditures through 2028. The total proposed rebate investment equals $136.0 million for 2027–

2031. The Company plans to request authorization for continued regulatory asset treatment for these rebate expenditures as part of its next general rate case filing. The buildup of these rebate amounts is reflected in Table 14 below.

Table 14 Proposed TEP Rebate Programs, 2027-2031

Customer Segment	Customer Sub-Segments	Rebate[72]	No. of Rebates	Portion of Market Supported	Total Investment (M)
Residential	LI 200% FPL Level 2	$2,000	1,365	100%	$2.7
	LI 201-400% FPL Level 2	$1,500	7,315	100%	$11.0
	Non-LI Level 2	$500	19,265	15%	$9.6
Multi-Unit Dwellings (MUD)	LI Level 2	$14,400	1,280	100%	$18.4
	Non-LI Level 2	$5,000	8,000	42%	$40.0
Public	DAC/rural on-route DCFC	$70,000	365	40%	$25.6
	All other on-route DCFC	$50,000	365	40%	$18.3
Workplace	Public Level 2	$3,750	1,125	4%	$4.2
Fleet	Transit bus DCFC	$100,000	10	100%	$1.0
	School bus DCFC[73]	$17,000 - $100,000	35	30%	$1.3
	Other DCFC	$25,000	10	1%	$0.3
	Level 2	$5,000	730	25%	$3.7
Total Proposed Rebate Investment					**$136.0**

This portfolio supports approximately 39,080 L2 charger ports and 785 DCFCs. MUD charging makes up the biggest category of rebate investment at 43%, followed closely by public charging at 32%, Residential at 17%, fleet at 5%, and Workplace at 3% as shown with Table 15 below.

Table 15 Proposed Overall Rebate Investment by Category

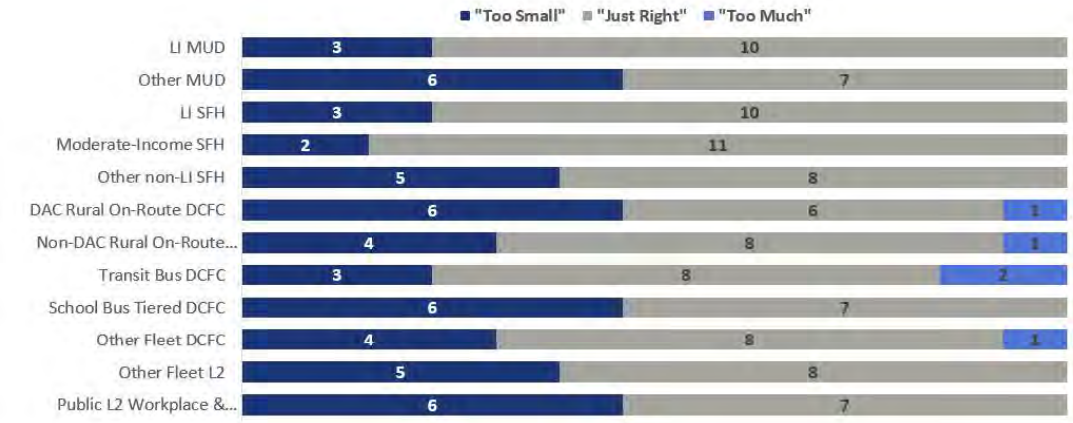
Category	Total Investment (M)	% of Total
Residential	$23.3	17%
MUDs	$58.4	43%
Public	$43.8	32%

[72] LI Residential and LI MUD are average estimates based on total installation costs and would not exceed actual costs; Electric Choice participants receive rebates at roughly 35% of standard levels to account for reduced revenue recovery and preserve portfolio-level affordability benefits.
[73] School bus rebates are tiered based on the charger capacity output as shown with Table 12 (Section 4.5)

Category	Total Investment (M)	% of Total
Workplace	$4.2	3%
Fleet	$6.2	5%
Total	136.0	100%

As illustrated in the Figure 15 below, stakeholder feedback indicates strong alignment between the proposed rebate levels and market needs across all customer sub-segments. A clear majority of survey respondents rated the proposed incentives as “just right,” suggesting that rebate amounts are appropriately calibrated. In the limited number of sub-segments where respondents viewed the incentive as “too much,” feedback indicated that concerns about insufficient support were substantially more prevalent (by a factor of two to six) than concerns about excessive incentive levels. Notably, every customer sub-segment included at least three respondents who felt the proposed rebates were “too small,” signaling continued cost sensitivity and persistent market barriers. Collectively, these results demonstrate that the proposed rebate structure strikes an effective balance between fiscal prudence and meaningful market support, reinforcing both regulatory objectives and stakeholder confidence in the TEP design.

Figure 15 Survey Responses to Proposed Rebate Amounts by Sub-Segment[74]



[74] The 13 DTEE Stakeholder survey respondents included representatives from Clean Fuels Michigan, Michigan EIBC, Natural Resources Defense Council, SWTCH, Qmerit Electrification, Ford Motor Company, City of Ann Arbor, EV Noire, Avista Utilities, Clean Energy Works, 5 Lakes Energy, Dunamis Clean Energy, Ecology Center

Consistent with Commission approval of regulatory asset treatment for TEP rebates through 2028, DTEE will manage rebate program implementation within authorized funding levels, including managing annual participation while remaining within Commission-approved investment caps.

5 Grid Integration

5.1 Distribution System Planning

DTEE's DSP is intentionally and transparently integrated with the Company's TEP Refresh. Together, these filings establish a unified, data-driven pathway to prepare the grid for rapid, equitable, reliable and cost-effective EV adoption through the respective 5-year plans. Consistent with Commission guidance, EV forecasts, grid-impact assessments, unit-cost assumptions, and portfolio proposals developed through the TEP flow into distribution planning and related cost-recovery proceedings, with alignment maintained across the Company's broader planning framework, including the IRP.

Consistent with the MPSC's TEP filing requirements, DTEE's distribution planning framework seeks to maximize the overall benefits of EVs and other electrified transportation while minimizing overall costs. The TEP is explicitly an input to the distribution plan, requiring the Company to discuss how transportation electrification affects distribution system impacts, grid-management opportunities, broader system outcomes, and the efficient integration of renewables. DTEE has embedded these requirements into the DSP workstreams and reporting cadence.

- **Strategic Integration:** EV adoption forecasts, charger deployment needs, and EV-specific load shapes from the TEP are incorporated into the DSP's load-forecasting and asset-planning models to target the right investments in the right locations and timeframes.
- **Regulatory Coordination:** The TEP/DSP alignment supports timely, synchronized regulatory review and provides clear pathways for cost recovery of prudent electric distribution investments associated with EV readiness.

The TEP Refresh provides updated market assessments to inform distribution planning, including reflecting current policy headwinds and stakeholder feedback. EVs in DTEE's service territory are forecasted to grow from approximately 125,000 vehicles in 2025 to over 420,000 by 2031, requiring around 195,000 incremental chargers across segments. This portfolio of charging

translates to over 1,300[75] gigawatt-hour (GWh) of annual EV-specific consumption by 2031, with more than 40% occurring at Residential locations, highlighting the central role of home charging and the grid-edge focus of distribution investments. These updated forecasts and their grid impacts are embedded in the DSP's capacity planning, feeder engineering, and grid-modernization roadmaps.

In addition to the Company's high-probability forecast, DTEE conducts scenario planning, including a scenario informed by the State of Michigan's goal to support two million EVs, which is used to stress-test distribution system readiness and inform investment sequencing under accelerated adoption conditions.

DTEE's Hosting Capacity[76] maps for distributed energy resources (DER) and load EV Hosting Map[77] provide customers and developers with transparent information about available capacity on circuit backbones. These tools, which the DSP will continue to enhance and automate, are used alongside method of service studies to translate EV adoption into actionable distribution investment strategies at the feeder and substation levels.

To reduce system peaks and optimize asset utilization, the DSP incorporates TEP-supported managed charging and demand-response offerings in shifting EV load into off-peak windows and coordinating with distribution automation and advanced distribution management system (ADMS) / DERMS capabilities. This operational technology stack improves situational awareness, restoration speed, and customer experience during both normal and adverse conditions supporting the DSP's reliability goals while deferring or right-sizing capacity investments where feasible.

DTEE's DSP applies an equity lens consistent with TEP filing requirements, leveraging the same MiEJScreen scores to prioritize investments in disadvantaged and rural communities and low income neighborhoods. This approach ensures grid upgrades, public DCFC host siting, and multifamily enablement occur where they deliver the greatest public benefits and close access gaps with clear KPIs and annual reporting to track outcomes and refine plans over time.

Irrespective of the specific incentive designs ultimately approved, distribution investment must accommodate customer requests for new or upgraded service connections to install EV chargers.

[75] Reference Appendix D for detailed load projections by customer segment
[76] DTEE Hosting Capacity Maps available at https://dte.maps.arcgis.com/apps/webappviewer/index.html?id=64e9f4e0f82c42e7b7ed847273ec2764
[77] DTEE EV Load hosting maps available at https://dte.maps.arcgis.com/apps/webappviewer/index.html?id=15bba98a360740929f0d5c6bec8fdd6c

Based on historical work orders and current cost data, DTEE estimates ~$173 million in utility-side make-ready investment will be needed through 2030, with approximately 85% of costs borne by DTEE under existing tariff and line-extension policy and the balance funded via customer Contribution in Aid of Construction (CIAC). These investments are included in the Customer Connections portion of the DSP capital plan and will be continuously updated as market conditions evolve.

DTEE's planning approach is iterative and transparent. DTEE will continue to engage it's stakeholders for each of the TEP filings, gather structured feedback, and incorporate stakeholder input into the DSP/TEP portfolio design, siting considerations, and investment timing. This continuous feedback loop supports effective prioritization and sustained customer trust as the journey to an electrified transportation continues to grow.

In alignment with the MPSC's TEP requirements, DTEE will provide annual progress reports covering EV adoption, charger load shapes, program participation by income and environmental justice (EJ) metrics, uptime and energization timelines, spend by measure, and KPI performance supporting transparent evaluation of benefits and continuous improvement. Cost recovery for TEP-related distribution investments will be proposed, as appropriate, in subsequent electric rate cases per Commission guidance.

5.2 Summary of EV Managed Charging Efforts

Just as targeted investment in the distribution system is essential for enabling widespread EV adoption, managed charging programs are a critical lever for maximizing grid utilization and minimizing the costs associated with increased EV load. Unlike many traditional loads, EV charging is inherently flexible, most residential drivers travel about 30 miles per day[78], while today's BEVs average nearly 300 miles of range[79], enabling customers to shift the majority of charging to periods that best support grid system efficiency. By encouraging EV charging during off-peak periods, utilities can increase the utilization of existing generation and grid infrastructure,

[78] Average 2027-2031 projections from US Energy information Administration (EIA) Annual Energy Outlook 2025 for Alternative-Fuel Vehicles Light-Duty Vehicle Miles Traveled and Total Vehicle Stock.
[79] Average electric range sourced from Electric Power Research Institute (EPRI) Consumer Guide to Electric Vehicles (October 2024)

effectively spreading fixed system costs over greater sales volumes, creating downward pressure on customer rates.

According to the ATE report published in August 2025 Driving Participation in Managed Charging Programs[80], *"Managed charging refers to the use of communication and control technologies to adjust the timing, rate, and duration of electric vehicle charging in response to grid conditions, price signals, or other objectives. Managed charging can be implemented through passive approaches (such as time-of-use rates) or active approaches (such as direct utility or aggregator control of charging)."*

DTEE's managed charging portfolio leverages both passive and active approaches to optimize EV load flexibility. Passive managed charging includes TOD rates and customer education, encouraging charging during off-peak windows to increase grid utilization and reduce system costs. In 2025, the Company offered five residential TOD rates:

- D1.2 two-tier enhanced TOD rate with weekday on-peak hours of 11 am – 7 pm,
- D1.8 three-tier dynamic peak pricing rate with weekday on-peak hours of 3 pm – 7 pm,
- D1.9 two-tier EV-only TOD rate with weekday on-peak hours of 9 am – 11 pm,[81]
- D1.11 two-tier standard/default TOD rate with weekday on-peak hours of 3 pm – 7 pm, and
- D1.13 three-tier overnight savers rate with weekday on-peak hours of 3 pm – 7 pm

These rates have consistently driven strong off-peak behavior. Under the Charging Forward program[82] and its last Annual Status Report published in September 2024, 92% of EV charging occurred outside the 3 pm – 7 pm coincident peak window[83].

With the March 2023 systemwide transition of all residential customers to D1.11, TOD pricing is now universal across all residential customers. With the TEP plan published in 2024, and the subsequent approval of the first year of the TEP execution in 2025, the Company narrowed the Home Charger Rebate focus to low-income customers. Since all residential customers now have a TOD component, this means passive managed charging is already embedded in customer bills, enabling cost-effective load shifting at scale. The Company continues to reinforce this behavior

[80] Alliance for Transportation Electrification, "Driving Participation in Managed Charging Programs," 2025. https://ate-ev.org/wp-content/uploads/2025/08/ATE_Driving-Participation-In-Managed-Charging-Programs_FINAL_8.21.25.pdf
[81] D1.9 requires installation of a second meter, and the 5,000 customer cap for this rate was reached in 2025
[82] Charging Forward pilot ended on 12/31/2024; residential customers needed to enroll in eligible TOD rates to qualify for DTEE's $500 Home Charger Rebate
[83] Charging Forward 2024 Annual Status Report

and promotes TOD rates and fuel savings benefits through education and outreach, ride & drive and static events, residential webpages, DTEE's Electric Rate Finder tool, and targeted messaging on off-peak charging benefits.

To further understand real-world charging behavior, DTEE conducted the EV Data Sharing Pilot in 2023, enrolling 610 EV drivers using telematics data provided by WeaveGrid. The pilot analyzed charging behavior across TOD rates and confirmed that EV drivers primarily enrolled in TOD-based structures such as D1.11 (37%), D1.2 (28%), D1.8 (18%), and D1.9 (16%), and overwhelmingly charged during off-peak hours. With no observable differences between pilot participants and non-participants, the Company concluded that TOD pricing alone reliably shapes charging behavior. These insights informed DTEE's rate design, outreach strategy, and distribution system planning, and validated the continued emphasis on passive managed charging.

DTEE also tested another passive managed charging approach through the Bring Your Own Charger (BYOC) pilot, operated in partnership with Sagewell from 2020-2022. The BYOC leveraged Sagewell's SageSight meter analytics and EV Identification Model algorithm to identify off-peak EV charging patterns and reward participants (up to $24 per quarter) for charging off-peak. The pilot enrolled more than 510 residential customers who were not already on a TOD rate, and successfully achieved 96% off-peak during the 3 pm – 7 pm coincident peak window. While BYOC demonstrated that targeted incentives and analytics can effectively shift EV charging behavior, DTEE strategically concluded the pilot due to broader program evolution. First, Tesla chargers (BYOC's primary focus) became eligible for the Charging Forward Home Charger Rebate in March 2022, enabling customers to access more significant incentives within a unified program structure. Second and more importantly, the transition of all residential rates to a TOD component in 2023 made passive managed charging universal and more scalable than maintaining a stand-alone pilot. The program's lessons nonetheless informed the Company's broader managed charging strategy and validated the effectiveness of TOD-driven behavior change.

For active managed charging, the Company continues to evolve its demand response program, DTE Smart Charge, which utilizes two distribution energy resource management systems (DERMS) platform providers to expand EV driver eligibility across DTEE's service territory. ChargeScape LLC is an automotive technology company founded by Ford Motor Company, BMW Motor Group and American Honda Motor Co., and participates via vehicle telematics from direct

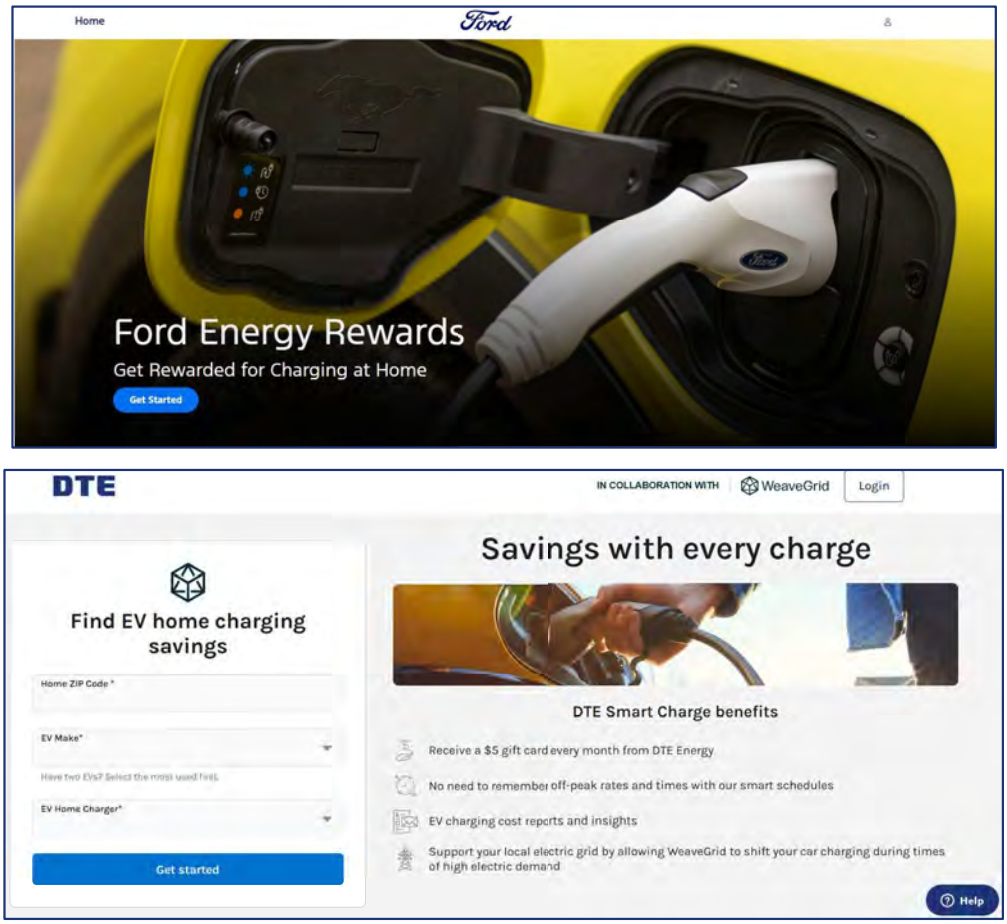
OEM integrations. WeaveGrid Inc. is a software development company that participates via vehicle telematics from direct application programming interface (API) integrations with automakers. DTE Smart Charge is designed to help EV drivers manage their charging to occur during the most optimal times of the day for grid operation. The current design of Smart Charge allows DTEE to coordinate directly with ChargeScape and WeaveGrid to schedule daily managed charging sessions to meet drivers' needs and reduce on-peak EV charging, while allowing up to five annual demand response events to pause EV charging when the company anticipates high demand on the grid.

The first phase of the pilot concluded after six months in August 2019 after calling 12 demand response events with approximately 165 Ford and General Motors (GM) employee EV drivers. The second phase of the pilot expanded beyond automotive employees to any Ford and GM drivers in the Company's service territory, increasing to 370 participants. DTEE dispatched 31 demand response events for eight months, ending December 2021, resulting in 1.7 MWh of avoided energy consumption during called events – enough energy to power an average Michigan home for nearly 60 days. In May 2022, BMW joined the continuation of Smart Charge with Ford and GM, which grew to 663 participants and called 46 demand response events over the 12-month period ending May 2023[84].

Since 2023, Smart Charge has rapidly scaled, surpassing its initial goal of 2,000 enrolled customers and, as of July 2025, enrolling over 2,700 participants with 1,400 through ChargeScape and more than 1,300 through WeaveGrid. This growth was supported by targeted marketing, including high-performing email campaigns (48.3% open rate, 9.3% click-through) and direct outreach through OEM apps and partner microsites (Ford, BMW and WeaveGrid). Customers can easily enroll, set charging preferences, and receive incentives for participation, with current rewards set at $5 per month. The Figure below, showcases customer enrollment examples.

[84] The aggregated load curtailment results of the pilot have not yet been publicized

Figure 16 Example Customer Enrollment Dashboard for Smart Charge Program



The program's flexible architecture allows DTEE to manage charging for vehicles connected via telematics or, where not available, through ChargePoint, Emporia and Wallbox smart chargers. This ensures broad eligibility and positions DTEE to adapt as the EV market evolves. Smart Charge's demand response capability has been demonstrated through multiple phases as noted above. The current program extension, approved through 2026, doubles the enrollment cap for each platform and enables ongoing innovation.

With the February Order in Case No. U-21860, the Commission directed the Company to include Smart Charge program performance, costs, and enrollment data in its next TEP including evaluation of managed versus unmanaged charging outcomes and program costs as input to future benefit-cost analysis using consistent data sets. In compliance with that order, the Company provides the following summary of available, year-to-date program results.

Program Performance: Throughout 2025, Smart Charge shifted an average of 93% of EV charging to off-peak periods for all participants. For WeaveGrid participants, 163,000+ plug

sessions were managed and a total of 3,745 MWh of energy was delivered to all devices. Of the total energy delivered, 97% was achieved during off-peak periods. For ChargeScape participants, 123,000+ plug sessions were managed and a total of 2,726 MWh of energy was delivered to all devices. Of the total energy delivered, 97% was achieved during off-peak periods. There was one demand response event called for ChargeScape participants on June 23, 2025 from 5pm – 7pm EST. Participation amongst all enrolled customers was less than 10% between Ford and BMW, and a sum of 989 kWh of energy was avoided during this event period. WeaveGrid participants were not able to participate in demand response events in 2025 due to additional costs associated with activating the capabilities to dispatch pause events.

Program Enrollment: By December 31, 2025, Smart Charge had a total of 1,802 Ford participants and 93 BMW participants enrolled through the ChargeScape platform, as well as 781 Tesla participants, 432 Emporia participants, 325 ChargePoint participants, and 53 Wallbox participants enrolled through the WeaveGrid platform. The largest enrollment period occurred in December 2025, when WeaveGrid offered new customers a limited time $60 sign-up bonus. This limited time offer captured 436 new participants to enroll in the Smart Charge pilot. Throughout the calendar year, DTEE encouraged each OEM partner to send recruitment emails to their designated drivers to achieve higher email targeting success.

Program Costs: In 2025, the total program costs associated with the Smart Charge pilot is $931,087. These program costs inform the Company's ongoing assessment of administrative cost impacts and scalability considerations, which will be evaluated as part of future benefit-cost analysis as enrollment increases.

Value Stream Analysis: DTEE is currently evaluating the ability to further reduce clustered EV charging peaks on the system. Under the original design of Managed Charging, Smart Charge participants were being shifted to their off-peak rate hours to assist with energy savings and alleviating high energy demand during on-peak periods. By shifting all customers to begin charging at the start of their off-peak periods, the concern of creating secondary peaks is evident. With the assistance of WeaveGrid, Load Balancing Distribution Integrated Smart Charge Orchestration (DISCO) is available to further reduce secondary peaks. The Load Balancing DISCO algorithm is uniquely operated for each customer by using customer-specific variables: current state of charge, desired state of charge by customer's ready-by time, time-of-use rate, neighborhood charging behaviors, and the hourly energy cost. After implementing Load Balancing DISCO, the overnight peak for participants was reduced by approximately 2 MW. Additionally,

there will be further evaluations to focus on local distribution needs to reduce peak demand on a specific asset using WeaveGrid's Grid Aware DISCO optimization. The project goals are to determine how many EVs can live on an asset before overloading is expected to occur to predict infrastructure needs and defer investments, as well as manage EV charging to provide bulk and distribution systems benefits while providing an exceptional, intuitive customer experience. The level of saturation needed in order for Grid Aware DISCO to be a valuable asset is currently being analyzed.

DTEE's experience with Smart Charge has yielded important lessons for the TEP Refresh strategy:

- **Consumer Data Awareness:** Customers need clear, transparent communication about how their vehicle data is used and protected.
- **Value Proposition Clarity:** It is essential to articulate how managed charging impacts customer mobility and to distinguish between routine off-peak optimization and demand response events.
- **Industry Transitions:** The shift from open vehicle-grid integration platform (OVGIP[85]) to ChargeScape required proactive engagement with Automaker Original Equipment Manufacturers (OEMs) and customers to ensure continuity and minimize disruption.
- **Locational Value Targeting:** While Smart Charge delivers measurable system benefits, DTEE's analysis found that TOD rates alone can achieve significant load shifting without assistance from an active Managed Charging pilot program. Due to low penetration and limited OEM accessibility, customer participation is scattered and not effective. In order to identify larger value streams, customers need to be targeted based on specific needs on our system.

By integrating Smart Charge with its broader managed charging portfolio, including passive TOD strategies, the Company is building the stage for a flexible, customer-centric platform that supports grid reliability, renewable integration, and customer savings as Michigan's EV market grows.

[85] OVGIP utilized vehicle telematics to enable managed charging through direct integration with participating OEMs. The platform was developed through a collaboration among the Electric Power Research Institute (EPRI), Sumitomo Corporation, and participating OEMs, and supported early phases of DTE's Smart Charge pilot prior to the transition to ChargeScape.

5.3 Managed Charging Outlook

Looking ahead, DTEE's managed charging strategy will continue to evolve to support Michigan's long-term electrification goals, while aligning customer needs, system benefits, and emerging grid technologies. The Company's future managed charging plans include a Vehicle-to-Home (V2H) pilot with Ford and GM employees, expanding DTE Electric Smart Charge to a program if additional value streams and cost effectiveness is achieved, and other key learning objectives. V2H creates a significant opportunity for EVs to be used as an energy resource. In addition to creating new revenue streams for transportation electrification, it can support peak shaving, absorb excess renewable generation, act as backup generation, mitigate local system constraints, and even provide ancillary services such as voltage support. The bidirectional charging industry is in the early stages of development. Although many utilities across the nation are pursuing pilots to test various bidirectional charging technologies, there have not been any industry standards or large-scale deployments due to lack of interoperability among various EVs, chargers, and utilities' telecommunication systems. Despite the challenge, DTEE is committed to working collaboratively with the industry to implement pilot solutions that can be scaled in current and future states. This pilot is currently active for Ford employees as of December 2025[86] and is expected to launch for GM employees in May 2026. While funding for the V2H pilot was awarded in 2024 through the Emerging Technology Fund (ETF), there were extensive setbacks to launching this pilot with both OEMs due to all participants being required to go through the interconnection application process with DTEE and receive permission to operate (PTO) status.

Smart Charge is planned to run through December 2026. Key goals for the latest iteration include dynamically charging the vehicle in response to day-ahead pricing signals, as well as implementing load balancing to protect DTEE's distribution assets for a select group of customers already participating in the pilot.

The TEP Refresh incorporates extensive learnings from both passive and active managed charging programs, including the demonstrated effectiveness of TOD rates in shifting EV charging to off-peak periods, as discussed earlier in this section.

Based on this evidence, and guided by stakeholder feedback collected through webinars, surveys and the Q4 engagement roadshow, DTEE evaluated whether to tie the non-low-income Residential $500 rebate to additional rate or program enrollment requirements. While several

[86] DTEE officially launched V2H pilot with Ford in December 2025. The Company onboarded 10 Ford employees to participate in a total of 25 prescheduled events by August 31, 2026, to evaluate the technology. Participants are eligible to receive up to $400 using an up-front and pay-for-performance incentive structure.

stakeholders supported the idea of linking rebates to managed charging participation, DTEE's analysis of the current EV driver behavior found that additional requirements are unnecessary.

Because all residential customers are already served on TOD-based rate structures (such as D1.11, D1.13, and D1.2), every non-LI customer receiving the rebate is already positioned to deliver meaningful load-shifting benefits simply by responding to existing price signals. Maintaining full customer flexibility aligns with stakeholder preferences for simplicity and accessibility, while the TOD foundation ensures continued system benefits. Rather than imposing enrollment mandates, the Company will rely on strong off-peak education and outreach to maximize customer and grid benefits. This includes reinforcing how overnight charging:

- Lowers fuel costs for EV drivers,
- Improves utilization of existing infrastructure, and
- Ultimately, creates long-term downward rate pressure for all customers.

This approach offers the best balance of customer convenience, program scalability, and system value as Smart Charge continues to mature.

As Smart Charge progresses through 2026 and seeks to demonstrate additional grid-value opportunities, such as expanded day-ahead optimization, deeper telematics integration, and circuit-level load balancing, DTEE will evaluate the potential role of active managed charging as an input to future residential program design considerations. Any potential integration with the residential non-LI program offering would be subject to future TEP filings or other Commission-approved proceedings. Any such evaluation would be informed by:

- Demonstrated program value streams,
- Cost-effectiveness analysis,
- Customer experience and mobility impacts, and
- Lessons from EV adoption growth and system performance.

Until that evaluation is complete, the Company believes that the combination of universal TOD rate structures and strong E&O provides the most cost-effective, equitable, and grid-efficient foundation for supporting Michigan's growing EV market.

5.4 V2G Pilots

DTEE's School Bus Chargers pilot laid the groundwork for Vehicle-to-Grid (V2G) innovation by installing V2G-capable infrastructure per the interconnection bi-directional standards. In 2024, one participating school district successfully installed V2G chargers and is currently in the final stages of the interconnection process. The three other schools in the pilot shifted their focus back to standard charging. Findings include roadblocks as schools not having staff to support, interconnection barriers, costs and that a very limited number of brands offer V2G capable chargers.

Building on these insights, DTEE will continue to allow V2G chargers to be eligible for Fleet rebates and plans to test V2G enabling bidirectional energy flow between electric vehicles and the grid with the school that is taking proactive steps to become V2G ready.

5.5 Load Forecasting

As outlined in Section 2.4.3, the methods and assumptions used to project EV adoption and associated load are aligned across the Company's TEP, IRP, and DSP. In its 2023 Distribution Grid Plan and 2022 IRP, DTEE outlined the development of an Integrated Forecasting Solution (IFS) to centralize all load forecasting inputs for key regulatory filings, including TEPs, IRPs, DSPs, and rate cases. Historically, generation-level forecasting and distribution planning have operated in silos due to the complexity of forecasting spatial data. While distribution forecasts have been performed at the substation or circuit level, they typically focused only on annual peak demand. With emerging technologies such as EVs driving dynamic changes in load patterns, a more robust approach is needed.

To address this, the Company's load forecasting team pursued the capability to produce 8,760 hourly forecasts at the substation and circuit level. These bottom-up forecasts will be sourced from the same inputs and assumptions as the system-level hourly forecast used in IRPs, ensuring alignment between resource and distribution planning. Ultimately, the IFS delivers integrated, aligned forecasts that improve coordination across business units and planning processes.

To demonstrate this alignment, the EV adoption forecast for DTEE is applied consistently across the three plans:

- **Transportation Electrification Plan:** Uses the EV adoption and load forecast for the market assessment to determine charger requirements within the DTEE service area.

- **Integrated Resource Plan:** Applies the EV adoption and load forecast at the service area level to project future generation needs, including hourly charging impacts and potential changes to DTEE's peak demand.
- **Distribution System Plan:** Utilizes the same EV adoption and load forecast to project where adoption will occur geographically across the distribution system, ensuring that customer-level adoption projections reconcile with the system-level adoption forecast. The load impact is calculated using the same hourly charging profiles applied in system generation planning, and these profiles are incorporated into circuit and substation forecasts to understand feeder-level hourly changes resulting from EV adoption.

6 Supporting Functions

6.1 Education & Outreach

DTEE EV E&O was established as a permanent offering in Case Number U-21297. A utility's role in EV education has been backed by an American Council for an Energy Efficient Economy (ACEEE) report which found that EV education and outreach are required, *"As electric vehicles currently represent a relatively small percentage of the nationwide vehicle fleet, educating the public about program offerings and the benefits of EVs is crucial to ensure uptake and scale transportation electrification into the mainstream."*[87] A white paper from the Alliance for Transportation Electrification and Plug In America further supports utilities roles in EV education stating that, *"A regulated utility is an ideal entity to help educate customers on the benefits of EVs, the correct charging infrastructure needed and EV charging rates, to the benefit of all customers."* DTEE's EV Education & Outreach (E&O) efforts are designed to break down barriers to electric vehicle adoption, highlight EV benefits, promote equitable access to EVs for all customers, and increase awareness of the rebate programs to further the adoption of EVs.

DTEE's E&O uses a multichannel marketing approach which includes bill messages, digital ads, emails, social media, print materials including dealership signs, rEV student presentations, ride and drive events, and in-person EV learning experiences. These efforts drive customers to DTEE's comprehensive EV webpages to learn more, access program applications, and to utilize the resources that the Company has made available such as EV total cost of ownership information in the "EV Showroom", charger maps, and electric TOD rates information. Since TEP

[87] ACEEE Utility Transportation Electrification Planning – Emerging Practices to Support EV Deployment Report available at https://www.aceee.org/research-report/t2201, September 2022

launch, more than 230,000 customers have visited the residential EV website and business EV website. DTEE also hosts in-person EV experiences including ride and drives, with over 95% of those surveyed stating that they learned "something" or "a lot" about the benefits of EVs at these events. One survey respondent shared, *"First of all, thank you for sharing this experience with me. I now have more knowledge about EV's, their maintenance, software updates and electric bill monthly costs. The staff at the event were both knowledgeable and friendly to talk to."*

DTEE continues Fleet Advisory Services to empower fleet owners to make informed decisions about how to best electrify their fleets. Additional objectives include supporting customers seeking federal funding when available and applying lessons learned from initial deployments to future distribution operation planning efforts. From its TEP benchmarking, DTEE found that 88% of the plans detailed fleet advisory services for light- and heavy-duty fleets."[88] Additionally, in 2025 DTEE started offering Multifamily EV Advisory Services. The purpose of these services is to support multifamily properties through the project assessment, rebate, and installation process with one-on-one support tailored to the customer's needs. This has included but not limited to determining the amount of charge ports, identifying locations on their property for chargers, and understanding charging hardware and network options.

The Company proposed EV E&O as a permanent offering in Case No. U-21297, and the MPSC approved $1.5 million on an ongoing basis for these efforts. 100% of surveyed stakeholders[89] felt continued E&O as part of the TEP is either "important" or "extremely important" and nearly 92% responded the same for Fleet Advisory Services with 8% responding "neutral".

DTEE proposes to increasing annual EV E&O to build on program's success, expand support for more events, and present rEV to more students, an EV educational program for schools led by the National Energy Foundation as described in Section 2.6.

The proposed increase totals $8.0 million for the TEP timeframe.

[88] Consumers Energy Transportation Electrification Plan 2024, ComEd Beneficial Electrification Plan 2 2026-2028, Xcel Energy 2024-2026 Transportation Electrification Plan Public Service of Colorado, Consolidated Edison Company of New York, Inc. Electric Vehicle Infrastructure Make-Ready Program Amended Implementation Plan, PGE 2023 Transportation Electrification Plan, Southern California Edison Charge Ready 2 Infrastructure and Market Education Programs, Northern States Power Company (Xcel MN) 2023 Transportation Electrification Plan

[89] DTE Electric (2025) TEP stakeholder survey [unpublished]

Table 16 E&O by TEP Cycle ($M)

	2025	2026	2027	2028	2029	2030	2031	Total
2025-2028 TEP	1.5	1.5	1.5	1.5	n/a	n/a	n/a	6.0
2027-2031 TEP Refresh	n/a	n/a	1.5	1.6	1.6	1.6	1.7	8.0

Table 17 Proposal to Expand Total E&O Events and Programs

	2027	2028	2029	2030	2031	Total
Event Count	30	32	34	36	38	170
Students in rEV (in thousands)	3.5	4	4.5	5	5.5	22.5

6.2 Emerging Technology Fund

The Emerging Technology Fund (ETF), approved in Case No. U-20836 in 2022, was established first as a $900,000 grant program to enable early-stage pilots that advance transportation electrification in a rapidly evolving market. The ETF focuses on technologies that enhance EV-grid integration, improve access for underserved communities, and explore innovations such as second-life battery applications.

Project proposals undergo a three-stage review process: (1) initial screening by the EV program team, (2) cross-functional review across DTE business units, and (3) final scoring by an external Advisory Committee. The Advisory Committee (formed in 2023) includes representatives from the Ecology Center, EPRI, Ford, GM, MPSC Staff, and NextEnergy, helping ensure projects align with ETF objectives and deliver measurable value.

Through 2024, the Company approved seven ETF-supported pilots, several of which remain in progress. These projects include:

- **Rainforest Automation:** Residential load management devices enabling L2 charging without service upgrades,
- **EPRI:** Participation in EV research through EPRI's Transportation Electrification membership program,
- **It's electric:** Public-facing L2 charging model exploring subsidized infrastructure and revenue sharing with site hosts,
- **Forth:** Low-cost, EV carsharing pilot at MUD sites in Detroit and Ann Arbor. As of December 2025, the pilot provided 760 trips totaling over 43,000 EV miles,
- **V2H Residential Pilot:** Collaboration with Ford and GM to evaluate home-backup charging and future V2G potential,
- **Liberas:** Demonstration of scalable interconnection processing, detection of interconnection faults, and remediation of those faults, and
- **JouleLabs:** Autonomous robotic EV charging solutions to support ADA and fleet applications.

In 2025, process improvements and targeted outreach significantly expanded interest. The ETF received 32 applications totaling $10.6 million, with $6.8 million in eligible grant requests. Six projects totaling more than $950,000 were selected, including:

- **Volt Harbor**: Affordable, commercial-scale battery energy storage system using retired EV batteries to store electricity during peak demand,
- **Voltpost**: Conversion of existing lampposts into L2 chargers, offering convenient charging without disruptive construction,
- **Forth**: Continuation of its AMP EV carsharing program in Detroit and Ann Arbor to help connect residents with reliable transportation options,
- **ev.energy**: Managed charging demonstration at multifamily housing to shift charging to lower-cost grid periods,
- **Metro Consulting Associates**: Mobile EV fast-charging EV units deployed at Grosse Ile Airport, allowing flexible charging for multiple types of vehicles, and
- **It's electric** Managed L2 charging on 100A service, in partnership with Bedrock Properties.

As approved in Case No. U-21297 in 2023, and in Case No. U-21860 in February 2026, DTEE will continue the ETF through 2026 with $1.0 million annually, subject to Advisory Committee review. Given the substantial growth in demand during the 2025 cycle and similar levels of interest

are projected through the end of 2026, and to better support innovations that accelerate transportation electrification, DTE proposes to increase annual ETF funding to $1.5 million for 2027–2031, totaling $7.5 million for the TEP timeframe.

Table 18 Emerging Technology Fund Grants by TEP Cycle ($M)

	2025	2026	2027	2028	2029	2030	2031	Total
2025-2028 TEP	1.0	1.0	1.0	1.0	n/a	n/a	n/a	**4.0**
2027-2031 TEP Refresh	n/a	n/a	1.5	1.5	1.5	1.5	1.5	**7.5**

In its January 2025 Order, the Commission directed the Company to provide an annual update on ETF pilots and lessons learned. DTE will meet this requirement in the next EV Annual Status Report, to be filed by June 1, 2026, covering Calendar Year 2025 activities.

6.3 Program Administration

DTEE continues to maintain a permanent EV team consistent with the Commission's December 2023 Order in Case No. U-21297 and January 2025 Order in Case No. 21860 in which it approved the team's establishment to provide high-quality administration of the Company's EV programming. This team oversees strategy, program delivery, and coordination of EV-related federal funding opportunities for Southeast Michigan.

Annual program administration costs are estimated at an average of $2.0 million to support labor, the web-based rebate application platform (PowerClerk®), and industry knowledge sharing.

6.4 TEP Information Technology (IT) Capabilities

Consistent with the Commission's February 2026 Order and the TEP filing requirements, the Company has made targeted investments in IT capabilities to support robust metric tracking, transparent reporting, and efficient program administration for the TEP. In 2025, DTEE initiated a Request for Proposal to evaluate third-party vendors for dashboard development, ultimately

determining that an in-house solution in collaboration with the Company's automation team would best meet the evolving needs of the TEP portfolio and ensure cost-effectiveness.

DTEE is maintaining an annual IT investment of approximately $0.3 million through the 2027-2031 TEP Refresh timeframe, following the total projected initial investment of approximately $1.7 million through 2026 for dashboard buildout and data capability enhancements. This approach aligns with the Commission's guidance to ensure that utilities provide timely, accurate, and accessible data in their TEP Annual Progress Reports and ongoing regulatory filings.

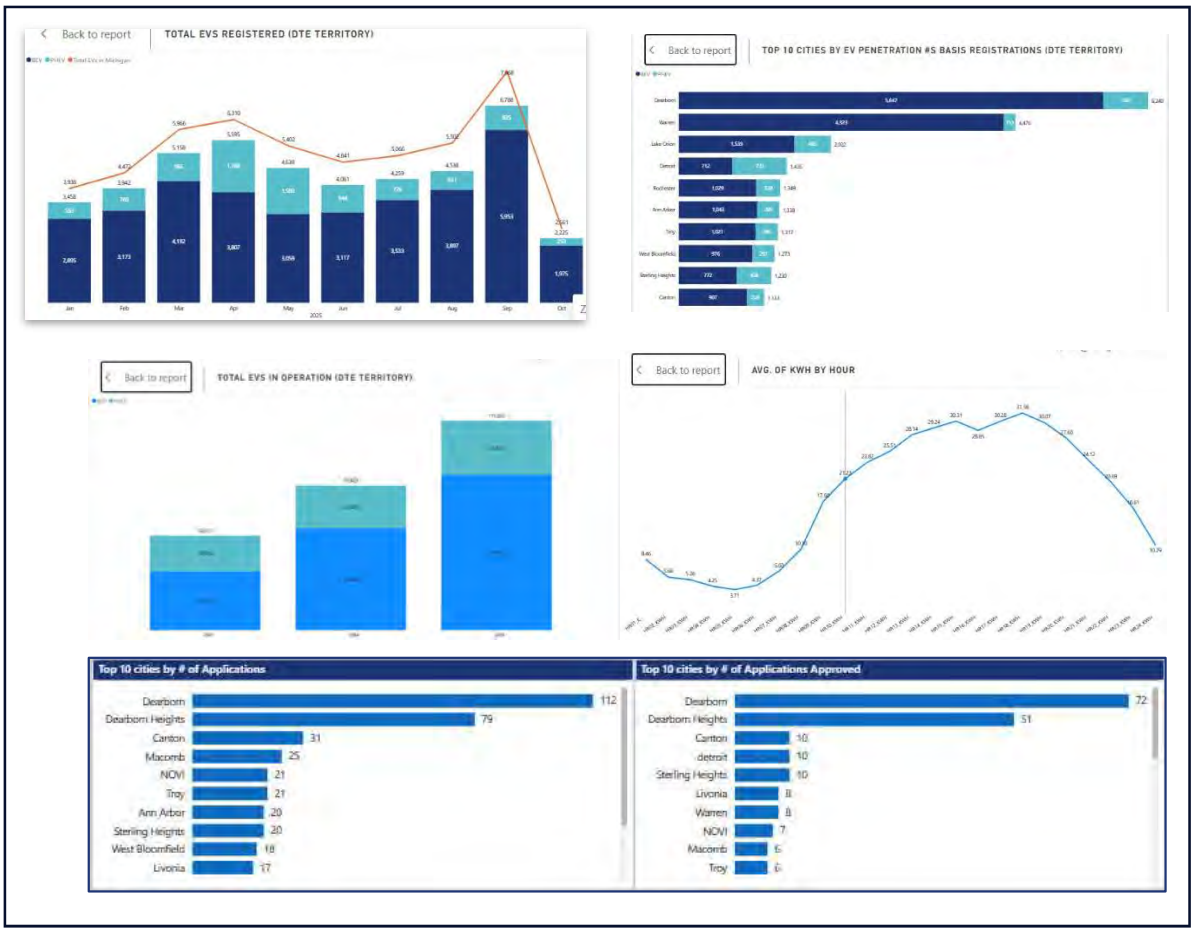
Key outcomes of this investment include:

- Two streamlined dashboards: one to populate EV registration, program and rebate data, and another to track marketing and outreach metrics, providing real-time visibility for internal teams and direct inputs to the stakeholder reports such as the TEP and its Annual Progress Reports.
- Enhanced data capabilities to monitor charger utilization and identify trends across the TEP portfolio.
- Enhanced data capabilities to monitor public charger 8760 load profiles
- Automated reporting of all program metrics, fully integrated with the requirements outlined in the Data and Reporting section and the Commission's TEP filing order.
- Integration and automation of application and rebate processing, including batch processing to improve operational efficiency and customer experience.

These IT enhancements are designed to improve transparency, support data-driven decision-making, and ensure that all stakeholders have clear insights into program performance and outreach impact. The total spend on IT capabilities remains in line with peer utility benchmarking and represents approximately 1% of the total rebate budget.

Examples of dashboard reporting are included in the figure below.

Figure 17 Examples of TEP IT Capabilities Dashboard Reporting



By investing in integrated IT solutions, DTEE meets regulatory and stakeholder interest expectations, thereby supporting the long-term success of its TEP.

7 TEP Impacts and Reporting

7.1 Equity Metric Outcomes

This section summarizes the Company's strategies and measures for expanding transportation electrification among disadvantaged communities, low-income customers, and underserved communities, consistent with the Commission's TEP filing requirements.

DTEE is committed to ensuring that the benefits of transportation electrification are accessible to all communities, with a strong emphasis on advancing equity for low-income households, DACs

and historically underserved populations. Equity is a foundational principle of the TEP Refresh, shaping both program design and investment strategy.

The TEP dedicates over 40% of total rebate investment to equity-focused programs, an allocation that exceeds the range of dedicated equity investment seen in peer utility TEPs. These initiatives are designed to reduce persistent barriers to EV adoption such as high upfront costs, limited access to home and multifamily charging, and gaps in public infrastructure in rural and DACs while supporting Michigan's statutory clean mobility goals.

As part of its equity assessment, DTEE evaluated income-based EV adoption using available anonymous VIO data[90]. This analysis indicates that approximately 3% of light-duty vehicles registered within DTEE's service territory are associated with low-income households [91], despite low-income households making up 30% of the Company's customer base. This data underscores the importance of targeted program design to help reduce upfront cost barriers and expand access to charging infrastructure for low-income and underserved customers.

Key Equity-Focused Programs Include:

- **Expanded Income Eligibility:** Home EV Charger Rebates now extend to households earning up to 400% of the FPL, broadening access for working families and moderate-income customers. This expansion is informed by stakeholder feedback and benchmarking, which show leading utilities moving beyond traditional low-income thresholds to maximize impact.

- **MUD Support**: Full-cost rebates for L2 charging installations in LI MUDs, prioritizing properties with the greatest need. This addresses unique barriers faced by renters and residents in shared housing, where landlord motivation and infrastructure complexity often limit access.

- **Public Charging in DACs and Rural Areas:** Increased support for DCFCs in underserved communities, offering higher rebates and targeting locations identified through state and federal mapping tools. This approach helps close charging gaps and reduce range anxiety for underserved populations.

[90] S&P Global Data as of February 2026
[91] S&P Global provides quarterly masked VIO data by income bracket. DTEE aggregates this data based on less than 200% FPL.

- **Fleet Electrification for Community Benefit:** Rebates for transit and school bus fleets serving DACs and low-income communities, recognizing the clean mobility benefits these investments deliver.

The TEP also integrates tailored E&O strategies to proactively engage LMI customers, renters, and rural residents. Tactics include email campaigns, referrals, Secretary of State ads, digital advertising, and partnerships with community organizations and local governments to maximize awareness and participation.

In accordance with MPSC filing requirements, DTEE monitors equity outcomes, including rebate distribution by income level, customer segment, and participation in equity-focused programs.

The Table below summarizes historical rebate participation and investment for equity-focused customer segments in 2025, alongside proposed rebate volumes and investment levels for the 2027–2031 TEP period.

Table 19 Equity-Focused Rebate Participation and Investment by Customer Segment (Low-Income, Disadvantaged Community, and Underserved Programs)

Customer Segment	2025 Rebates Installed (Actual)	2025 Rebate Investment ($M)	Proposed Rebates (TEP '27-'31)	Proposed Rebate Investment ($M, '27-'31)
Residential LI (<200%)	294	0.5	1,365	2.7
Residential (201-400%)[92]	n/a	n/a	7,315	11.0
Multi-unit Dwelling LI	22	0.2	1,280	18.4
On-Route Public DAC[93]	44	3.1	365	25.6
Fleet Transit Bus	-	-	10	1.0
Fleet School Bus	3	0.1	35	1.3
Total	**363**	**3.9**	**10,370**	**60.0**

[92] Rebate programs for moderate-income residential customers (201–400% FPL) are newly proposed in the 2027–2031 TEP and therefore do not have historical 2025 installation or investment data.
[93] Disadvantaged Community (DAC) eligibility is determined using EGLE's Michigan Economic Justice (MiEJ) Screening Tool. Equity-focused programs reflected in this table utilize MiEJScreen and Justice40 principles in program design and targeting.

Annual status reports and stakeholder engagement sessions provide transparency and inform potential future updates to the Company's TEP programming.

7.2 Benefit-Cost Analysis

The MPSC requires that TEPs include a transparent, well-documented BCA. In Case Number U-20836 Order, the MPSC requested directed DTEE to *"submit a full scale, well-developed, permanent Charging Forward proposal that includes a BCA."* The Commission additionally stated that *"[t]he requirement of a BCA should not be interpreted as a requirement that all pilots be financially solvent at the time they are proposed (although that is preferable) but that when weighing costs versus benefits for a full-scale program, benefits outweigh costs over the duration of the program."*

The January 2025 TEP Amended Filing Requirements in Case Number U-21492 further mandated that "*When a benefit-cost analysis is used in the development of the TEP, the methodology, analysis, and alternatives of the analysis shall be detailed. If the electric utility chooses to use scenario planning, it must discuss the analysis performed and present potential challenges under each scenario."* The U-21492 filing requirements also directed the Company to use the statewide BCA collaborative tool. The Company is supportive of using the BCA tool; however, it is not ready for this filing cycle.

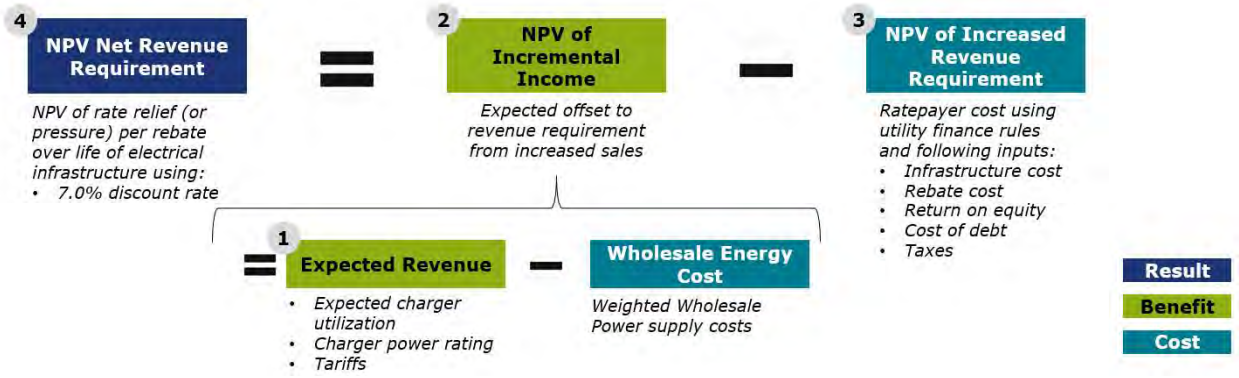
Furthermore, with the February 2026 Order in Case Number U-21860, the MPSC directed the Company to *"propose an accounting scheme that accurately captures the full NPV benefits, including all revenue attributable to charging and associated network effects, provided by its programs across customer classes."*

In compliance with these directives, DTEE refreshed the TEP BCA developed with the original filing in 2024, evaluating results under different scenarios reflecting varying treatments of EV load impacts. The updated BCA indicates that the proposed 2027–2031 TEP portfolio provides long-term net benefits at both the segment and portfolio levels under the full EV adoption load and even with the most conservative scenario that only takes credit for the program attributed EV load (approximately 9%).

DTEE continues to apply the net present value (NPV) of the net revenue requirement as the BCA test, consistent with prior Commission guidance and the methodology used in the original TEP. This metric ensures continuity and comparability across TEP filings.

The NPV Net revenue requirement test evaluates whether incremental EV load generates sufficient additional electric revenue to offset the Company's program investments. Figure 18 provides a visual summary of this approach, illustrating how incremental electric revenue, wholesale energy costs, and utility cost recovery interact to determine long-term rate impacts.

Figure 18 Benefit-Cost Analysis Overview Diagram



Under this framework, the revenue requirement represents the additional incremental income DTEE must collect to recover the cost of administering the TEP programs. A negative NPV indicates that total TEP program costs exceed the income generated by incremental EV load, thus resulting in rate pressure or customers paying higher electric rates. Conversely, a positive NPV indicates that incremental EV load produces more income than the cost to serve and incentivize it, resulting in rate relief for all customers.

The revenue requirement analysis takes several elements into consideration, grouped by whether they are adding rate pressure or are providing rate relief:

Rate Pressure (+)

- (+) Utility make-ready (UMR) investment of rebated chargers,
- (+) Rebates for chargers,
- (+) Supporting Functions costs (for portfolio-level only),
- (+) Wholesale energy cost of serving incremental EV load.

Rate Relief (-)

- (-) Electric revenue from incremental EV load.

The baseline BCA reflects the full EV adoption load associated with 100% of projected EV sales, consistent with the Commission's February 2026 Order in Case No. U-21860 directing enhanced accounting for the full net present value (NPV) benefits of the TEP. This baseline captures all chargers required to serve the full forecast of EV sales, rather than only rebated installations, and therefore reflects the full magnitude of the broader system-level load benefits associated with EV growth. Detailed results under this full-adoption baseline, including projected charger installations, associated Non-CIAC UMR, and NPV of net rate relief by customer sub-segment, are presented in Table 21.

DTEE also evaluated a program-attributed sensitivity case that includes only incremental load from rebated chargers, representing approximately 9% of total forecasted EV load through 2031. This sensitivity provides a conservative illustration of customer benefits by excluding broader EV adoption and non-rebated charging infrastructure from the NPV calculation.

Step 1: Expected Revenue

As the first step in the BCA, DTEE estimates expected revenue by calculating annual energy usage for each rebated charger segment using market assessment utilization assumptions and updated charger power ratings proposed for the TEP Refresh. Annual usage is calculated as follows:

Annual usage (kWh/year) = 8,760 (hours/year) × charger power (kW) × utilization rate (%)

Charger power ratings were updated based on industry data, peer utility benchmarking, and first-year TEP program experience to ensure assumptions remain market-responsive. For example, for MUDs DTEE proposes lowering the minimum charger requirement from 12 kW to 9.6 kW, enabling tenants to achieve full overnight charging at reduced installation cost while supporting property owners to install higher port density. Charger utilization rates represent the percentage of time a charger is expected to be in active use. The utilization values used in this BCA are derived from the market assessment model. Updated charger power and utilization assumptions, along with prior TEP values, are provided in Appendix G.

The BCA mostly assumes a constant charger utilization rate over the 40-year asset life, even though utilization is expected to rise over time as EV adoption accelerates, especially in segments where chargers serve multiple vehicles, such as on-route DCFCs. DTEE calculates the utilization rates as the total energy required for each sub-segment (based on EV sales forecasts,

vehicle-miles traveled, and vehicle efficiency) divided by the energy deliverable from installed chargers, reflecting charger power levels, annual throughput per port, and charger counts. For most segments, the BCA uses a flat 2027 utilization rate from the market assessment model. The exception is Fleet DCFC, where a modest utilization ramp is applied from 2027–2031 to reflect early-stage fleet electrification behavior, after which utilization is held constant for the remainder of asset life.

Step 2: NPV of Incremental Income

Following the calculation of expected annual usage, the BCA next estimates incremental income attributable to each charger which is calculated by combining expected annual usage, projected revenue, and wholesale energy cost. Incremental income reflects the net annual financial benefit to the Company for each charger from "qualified" incremental EV load and is calculated as:

Annual incremental income ($/year) = annual usage (kWh/year) * [revenue – cost] ($/kWh)

Electric revenue from incremental EV load is calculated using projected tariff rates by customer segment and associated average load profiles[94] per rate class. Projected revenue rates reflect a 2.57% annual increase from 2027, incorporating approved tariffs and PSCR factors from the Company's most recent electric rate case Order in Case No. U-21860[95].

The energy cost to serve incremental EV load is calculated as a weighted annual average wholesale power price for each customer segment, derived from hourly wholesale market price forecasts[96]. A wholesale cost basis is used because incremental EV load represents a small share of total system demand, and wholesale marginal prices provide the most accurate estimate of the utility's avoided-cost-based incremental expense.

Incremental income is calculated by subtracting the wholesale cost of energy from the expected increase in revenue for each charger. Base-year (2027) tariff rates and wholesale power prices are summarized in Table 20.

[94] DTEE rates and forecasted Time of Day (TOD) split of on-peak vs. off peak charging are used for the corresponding tariffs. Rates reflect the most common choices among EV residential customers using EV Identification Model.
[95] S&P/HIS Markit-US Economic Outlook: Jan 2026, Average non-Labor Inflation rate for 2026-2028
[96] This is determined by multiplying the hourly load forecast for each customer segment by the corresponding hourly market locational marginal pricing forecast to determine the total annual cost for that customer segment, and then that total cost is divided by the total energy consumed by that customer segment. Starting in 2051, cost of energy for all segments is assumed to grow at 2.57%. The marginal pricing forecast reflects blended energy market forward pricing in years 2026-2029 and a long-term fundamental reference scenario developed using industry-standard production cost modeling tools.

Table 20 2027 Values for Electric Tariff Rates and Wholesale Power Price

Input	$/kWh	Source
Electric Tarif Rates Assumptions		
Residential charger revenue	0.1990	Weighted average of residential rates D1.2, D1.11, and D1.13[97]
School bus Charger revenue	0.1642	Service rate D3.2
All other charger revenue	0.1701	General service rate D3 (no demand charges)
Wholesale Power Price Assumptions		
Residential & MUD	0.0516	Weighted Wholesale Power supply costs
Fleet	0.0551	
Public	0.0536	
Workplace	0.0524	

Step 3: NPV of Increased Revenue Requirement

The BCA next estimates the increased revenue requirement associated with each charger. This step incorporates proposed rebate levels and market support, as well as and expected UMR costs by customer segment. Key design elements include:

- Segment-specific rebate levels updated to reflect current market conditions
- Fixed rebate amounts for most segments, with full installation cost coverage for low-income offerings

[97] Using EV Participation Model participant tariffs and split of on-peak vs. off-peak charging for the corresponding tariffs

- Updated UMR cost assumptions reflecting revised installation pricing and customer-owned CIAC exclusions[98]

Revenue requirements are calculated using standard utility finance principles, treating rebates as regulatory assets and capitalizing UMR investments consistent with utility accounting rules and Commission precedent. Financial assumptions[99] applied in the BCA are listed include:

- Rebates amortized as a regulatory asset over 10 years[100]
- UMR investments depreciated over 40 years[101]
- 50/50 debt-to-equity capital structure
- 9.9% post-tax return on equity
- 4.27% weighted average cost of debt
- 25.9% income tax rate
- 2% property tax
- 7.0% discount rate for NPV calculation[102]

For each segment, the increased revenue requirement is determined by applying these assumptions to segment-specific rebate levels and non-CIAC UMR costs outlined in Appendix H. These costs are compared to incremental income (Step 2) to determine net segment-level benefits.

Treating rebates as regulatory assets aligns cost recovery with long-term EV load benefits and moderates near-term rate impacts. For each sub-segment, the NPV of incremental income from a single charger is multiplied the number of chargers required to support full forecast of EV adoption. The total NPV of incremental income is then offset by the NPV of increased Revenue Requirement for a single rebate multiplied by the number of rebates supported, yielding the total NPV of the net revenue requirement for that segment as described below.

[98] Customer-owned CIAC costs are excluded and assumed to be 15% of total utility make-ready cost (see Appendix E for infrastructure cost details).
[99] Unless otherwise noted, all assumptions are consistent with the Commission's February 2026 Order in Case No. U-21860
[100] Consistent with the Company's soon to be filed 2026 Electric Rate Case No. U-22046
[101] Consistent with expected useful life for electrical infrastructure
[102] Based on DTEE's currently approved order U-21860 pre-tax weighted average cost of capital of its total capital structure

Step 4: Net Present Value (NPV) of Net Revenue Requirement

In the final step, DTEE calculates the annual "net revenue requirement", defined as the difference between (1) incremental EV load benefits and (2) the annualized cost of rebates and UMR investments. This metric indicates whether each segment produces rate relief or rate pressure over the life of the assets. Annual net revenue requirements are discounted over the useful life of the assets to determine NPV. Across all supported segments, the TEP Refresh portfolio produces approximately $1.8 billion in NPV of net rate relief for DTEE customers.

The portfolio-level BCA reflects the sum of all segment-level NPVs net of the NPV of increased revenue requirement associated with TEP Supporting Functions costs, including Education and Outreach, Program Administration, and TEP IT Capabilities.

Consistent with the Commission's February 2026 Order in Case No. U-21860, the baseline BCA reflects full EV adoption load associated with 100% of projected EV sales, capturing all chargers required to serve the forecast of EV adoption rather than only those supported through rebates.

The baseline scenario reflects charger needs and related investment requirements consistent with market assessment presented in Figure 11 and discussed earlier in this section.

The Table below summarizes projected charger installations, non-CIAC UMR requirements, and long-term NPV of net rate relief by customer sub-segment under the full EV adoption baseline.

Table 21 Projected Charger Installations, Non-CIAC UMR, and NPV of Net Rate Relief by Customer Sub-Segment Under 100% EV Sales Coverage

Segment	Sub-Segments	Charger Installations	Non-CIAC UMR ($M)	NPV of Net Rate Relief ($M)
Residential	Low-income	1,365	36.8	6.2
	Moderate-Income	7,315		36.0
	Non-Low-Income	128,483		830.3
MUD	Low-Income	1,284	22.9	3.6
	Non-Low-Income	19,031		261.2
Public	DAC/rural on-route	900	98.7	96.3
	Non-DAC/rural on-route	900		102.3

Segment	Sub-Segments	Charger Installations	Non-CIAC UMR ($M)	NPV of Net Rate Relief ($M)
	Destination DCFC	3,375		25.9
Workplace	Destination L2	2,892		25.8
	Workplace	25,170		287.1
Fleet	Private L2	2,916	20.6	63.9
	Private DCFC	1,038		73.7
	Transit Bus DCFC	11		2.3
	School Bus DCFC	110		3.1
Total		**194,789**	**179.0**	**1,817.9**

Scenario 2: Program-attributed EV Load

DTEE also evaluated a program-attributed sensitivity scenario that includes only incremental EV load from rebated chargers, representing approximately 9% of total projected EV load through 2031 and resulting in $260 million of NPV rate relief. This scenario applies the same methodology described in Steps 1–4 and illustrates outcomes under highly conservative attribution assumptions.

Segment-level NPV results span a wide range, reflecting differing load profiles, tariff rates, costs, and utilization patterns, including $104.4 million in NPV of net rate relief for the Residential non-Low-Income segment, and $0.4 million in NPV of net rate pressure for the School Bus segment summarized in Table 22 below.

Figure 19 illustrates the pattern of annual net revenue requirement for a representative $50,000 non-DAC on-route DCFC rebate. The analysis shows:

- Early-year rate pressure, driven primarily by rebate amortization and timing of revenue recognition
- A turn to rate relief beginning in 2032, once financing costs decline and incremental EV load increases
- Sustained and growing rate relief thereafter, reaching nearly $22 million by 2066

This pattern with modest short-term pressure followed by significant long-term benefit, is consistent across most segments and is a key characteristic of EV load growth economics.

Figure 19 Example Annual Net Revenue Requirement for one $50K non-DAC Rebate ($ millions, 10-year amortization)

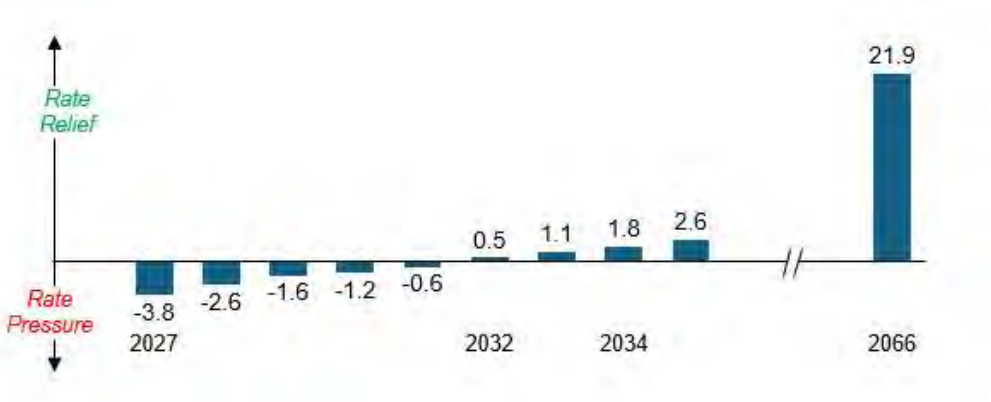


Table below summarizes the long-term NPV of net rate relief by customer sub-segment under the program-attributed EV Load scenario.

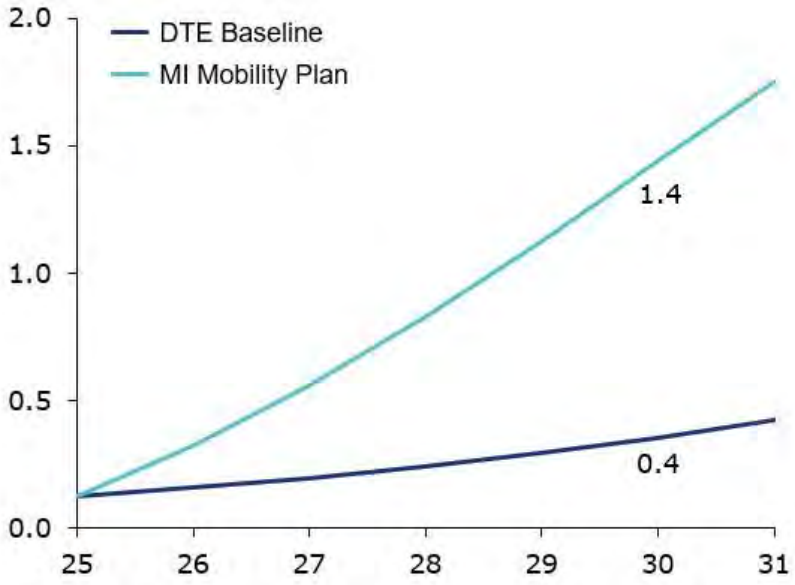
Table 22 NPV of Revenue Requirement of TEP Refresh Program-attributed EV Load Only by Customer Segment

Customer Segment	Customer Sub-segment	NPV of Revenue Requirement
Residential	Low-Income (LI)	$5.7
	Moderate Income	$32.7
	Non-LI	$104.4
MUDs	LI	$2.1
	All other	$75.8
Public	DAC/rural on-route DCFC	$17.6
	All other on-route DCFC	$23.6
Workplace	Workplace and Destination	$6.9
Fleet	Private L2	$11.9
	Private DCFC	$0.2
	Transit bus DCFC	$1.7
	School bus DCFC	($0.4)
Supporting Functions		$22.0
Total		**$260.2**

7.3 MI Future Mobility Plan Deployment Scenario

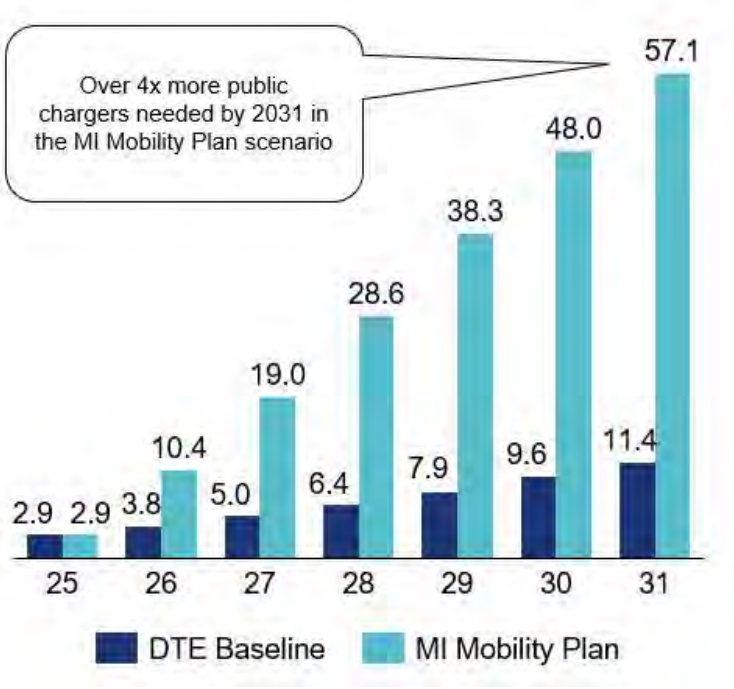
The MI Future Mobility Plan targets 2 million EVs and 100,000 public chargers statewide by 2030. For this scenario, DTEE assumed that approximately 75% of statewide EV adoption would occur within its service territory. Under these assumptions, EV adoption in DTEE's service area increases to over 1.4 million EVs and 48,000 public chargers by 2030, compared with approximately 400,000 EVs and 9,600 chargers under the baseline forecast. The figures below illustrate the resulting EV adoption and public charging infrastructure[103] trajectories and highlight the scale of acceleration required under this scenario.

Figure 20 Cumulative EV Forecast: DTEE Baseline vs. MI Mobility Plan (M)



[103]Using Alternative Fuels Data Center: Alternative Fueling Station Locator Data as starting point in 2025, where there are 5,178 operable public chargers in Michigan and assuming 56% of those chargers are in the DTEE service area

Figure 21 Cumulative Public Chargers Needed: DTEE Baseline vs. MI Mobility Plan (000s)



Supporting this level of adoption would require more than a sixfold increase in utility make ready investment relative to the baseline. As shown in the Table below, non-CIAC UMR investment for the 2027-2031 period increases, from approximately $179 million under the baseline to approximately $1,233 million under the MI Mobility Plan. All customer segments experience significant increases in required infrastructure investment, with public charging representing the largest driver due to scale of statewide charging objectives.

Table 23 Projected Utility Make-Ready Investment by Scenario for 2027 through 2031

Segment	Baseline ($M)	MI Mobility Plan ($M)
Single-Family Homes	37	187
Multi-Unit Dwellings (MUD)	23	122
Public	99	658
Fleet	21	266
Total	**179**	**1,233**

7.4 Data, Reporting and Regulatory Compliance

This section identifies the key performance indicators used to evaluate the success of the Company's TEP and describes how these indicators are used to inform continuous program improvement.

DTEE's data, reporting, and compliance approach is shaped by the regulatory foundation established through Commission orders. In November 2022, the MPSC directed the Company to develop a full-scale, permanent Charging Forward proposal in Case No. U-20836. This directive led to the Company's first comprehensive TEP, filed in January 2024 in Case No. U-21538. The Commission's subsequent January 2025 Order (Case No. U-21492) refined the TEP filing requirements, established a biennial cadence, and set the next TEP update deadline for July 1, 2026. Building on this foundation, the February 2026 Order in Case No. U-21860, approved the cost recovery associated with the second year of the TEP execution. Together, these orders define how DTEE structures its TEP and demonstrates progress to the Commission and stakeholders.

To meet these requirements, DTEE follows a consistent action plan that ensures timely filings, public accessibility, and meaningful stakeholder engagement. The Company filed its TEP Refresh in the second quarter of 2026 to maintain the biennial schedule, posted the plan publicly on the Empowering Michigan website[104], and electronically served all required parties. DTEE also convened multiple stakeholder meetings—including at least one session held after 6:00 p.m.—to ensure broad accessibility and to comply with Commission expectations. Coordination with MPSC Staff is ongoing throughout the planning process, enabling alignment on filing logistics, scenario development, and interpretation of policy guidance.

While certain multi-state reporting elements do not apply to DTEE, the Company fully meets the requirements relating to EV strategy, grid integration, market and equity analysis, forecasting, scenario planning, benefit-cost methodology, and public comment procedures. Detailed cross-reference tables mapping Commission Orders to corresponding TEP sections are provided in Appendices A, B and C.

Supporting this regulatory framework is a robust reporting process that allows the Company, regulators, and stakeholders to track program performance with clarity and consistency through defined key performance indicators (KPIs). DTEE publishes an Annual TEP Progress Report each

[104] 2027-2031 TEP downloadable on the 2026 Performance Report Tab

June, presenting a comprehensive overview of how programs are performing and where refinements may be needed to improve EV affordability, access, and long-term effectiveness.

This report includes core KPIs such as rebate applications filed and approved; charger uptime and utilization performance; the share of charging occurring during off-peak hours; customer satisfaction with TEP offerings; and detailed investment reporting, including total spend on utility and customer make-ready (UMR and CIAC), charger hardware, and equity-focused programs. The Company also reports installation cost per port by segment, which is used to assess cost trends, inform future program evaluations and proposals, and improve overall portfolio efficiency.

To support accurate and transparent reporting, DTEE has strengthened its data systems across multiple platforms, integrating AMI data, DERMS signals, telematics from Smart Charge partners, and program data from PowerClerk®. These tools enable automated dashboards that provide visibility into charger installations, customer participation, outreach performance, and equity outcomes. By aligning the datasets used in the TEP with those used in the Company's IRP and DSP, DTEE ensures that EV adoption forecasts, load shapes, and charging profiles are consistent across filings, supporting coordinated grid planning and cost recovery proposals in future rate cases.

This combined regulatory, data, and reporting framework ensures that DTEE's TEP remains accountable and responsive to Michigan's mobility goals. By maintaining a clear process for compliance, continuously improving its data capabilities, and providing reliable insight into program performance, the Company supports an EV transition that is equitable, cost-effective, and aligned with state policy and customer needs.

8 Conclusion

DTEE's refreshed Transportation Electrification Plan reflects extensive benchmarking, rigorous analysis, and broad stakeholder engagement, resulting in a portfolio that supports Michigan's clean mobility goals while balancing affordability and prioritizing equitable access. The plan incorporates lessons learned from seven years of EV program execution, integrates market and technology insights, and aligns with Commission directives, including the recent February 2026 Order (Case No. U-21860), which affirms the second year of TEP execution and reinforces the Company's data, reporting, and compliance framework.

The resulting portfolio advances the deployment of home, multifamily, public, and fleet charging infrastructure; strengthens managed charging capabilities; expands education and outreach efforts that support customer awareness, informed participation, and workforce and student engagement; and supports innovation through the Emerging Technology Fund. It emphasizes cost-effective L2 charging while expanding targeted on-route DC fast charging, expands eligibility to reach more households, prioritizes low-income and disadvantaged communities, and positions public and fleet charging where it delivers the greatest system and community benefit. Through these efforts, DTEE reduces charging gaps, supports grid readiness, and enables meaningful customer savings while delivering long-term affordability benefits at the portfolio level for all customers, as demonstrated in the TEP's BCA.

This TEP also provides a transparent and cohesive planning foundation across DTEE's IRP, DSP, and future general rate cases, ensuring that EV load forecasts, distribution upgrades, and cost-recovery pathways remain aligned. As the market continues to evolve, DTEE will maintain a structured approach guided by stakeholder input and future Commission-approved proceedings, implementing approved programs within authorized funding and programmatic constraints while also supporting the Company's mission to reliably support Michigan's transition to a cleaner transportation future.

Through this plan, DTEE supports EV adoption, equity objectives, and grid readiness in a manner grounded in forecasted adoption needs and system readiness while ensuring that the benefits of transportation electrification are shared across all communities in Southeast Michigan.

9 Appendices

Appendix A Cross-Reference of TEP Filing Requirements (Case No. U-21492)

Req. #	TEP Filing Requirement	Section of TEP
1	This document prescribes the filing requirements for an electric utility's TEP. The plan will contain the electric utility's long-term strategy to address transportation electrification in its service territory and its strategy to optimize electric vehicle (EV) charging load. The TEP will include planned investments, incentives, programs, and expenditures that are expected to increase transportation electrification in the electricity utility's footprint during the plan.	✓2.1 Scope and Purpose
2	By 5:00 p.m. (Eastern time) on July 1, 2025, and at least every two years thereafter unless otherwise ordered by the Commission, an electric utility must file a TEP with the Commission in Case No. U-21538: a) The electric utility shall electronically serve a copy of its TEP on all intervenors from its last rate case, all persons who filed initial comments or reply comments in Case Nos. U-21492 and U-21538, and when applicable all persons who filed initial comments or reply comments on its last TEP filing; b) The electric utility shall also post its most recently filed TEP on its website; c) Both Consumers Energy Company and DTE Electric Company have filed TEPs in 2024. Given the new and additional data and reporting requests in this document, both companies shall file new TEPs in 2026;d) An electric utility shall work with the Commission Staff to stagger the TEP filings as necessary; e) An electric utility with fewer than 100,000 customers may request a TEP waiver. Any request for a waiver shall include a discussion and justification outlining why the waiver is warranted, whether the company has a planning process in place that projects transportation electrification impacts within its service territory – even if the plan is not aligned with these TEP requirements, and how the waiver results in the best interest of its customers.	✓ 2.1 Scope and Purpose
3	If an electric utility's service territory includes another state, they shall include any relevant TEP information from the additional state in their Michigan filing.	N/A

Req. #	TEP Filing Requirement	Section of TEP
4	Except as specifically provided herein, these filing requirements do not supersede any other Commission rule or requirement	✓ 2.1 Scope and Purpose
5	An electric utility must hold at minimum two outreach meetings with interested persons in advance of filing its TEP. These events may be in person and/or virtual. One event must be held after 6:00 p.m. (Eastern time). A description of the events and participation lists must be included in the TEP filing.	✓ 3.4 Stakeholder Engagement ✓ 7.4 Data, Reporting and Regulatory Compliance
6a	Strategies and measures for coordinating with state or federal EV infrastructure planning	✓ 2.1 Scope and Purpose ✓ 2.5 State and Federal Policies and Programs ✓ 5.1 Distribution System Planning
6b	A discussion of existing state policies and programs. If an electric utility is in multiple state jurisdictions, it should include an overview of that additional state's transportation electrification and/or EV policy goals and programs;	✓ 2.5 State and Federal Policies and Programs ✓ 1.1 Strategic Objectives
6c	An overview of the current retail market for EVs and charging equipment within the utility's service territory;	✓ 2.4 EV Market in Southeast Michigan ✓ 2.4.7 Public Charging Landscape and Market Barriers
6d	A summary of the electric utility's TEP and future transportation electrification concepts and actions in its service territory. The TEP should incorporate project learnings and any other relevant information gathered from other transportation electrification infrastructure investments, programs, and actions from local, federal, or external organizations to ensure that lessons learned are carried forward;	✓ 1 Executive Summary ✓ 3 TEP Refresh 2027-2031 ✓ 4 TEP Portfolio ✓ 4.6 Key Lessons Learned and Implementation Considerations
6e	The TEP should be an input into the electric utility's distribution plan. The TEP must include discussion of how distribution system impacts from transportation electrification will tie into its distribution plan, opportunities for efficient grid management, the broad system impacts resulting from increased transportation electrification and the electric utility's portfolio of actions, and how transportation electrification can support the efficient integration of renewables;	✓ 2.4.6 EV Peak Demand Forecast ✓ 5 Grid Integration ✓ 5.1. Distribution System Planning ✓ 5.2. Summary of EV Managed Charging Outlook ✓ 5.3 Managed Charging Outlook ✓ 5.4 V2G Pilots

Req. #	TEP Filing Requirement	Section of TEP
6f	All electric utility investments or incentives to facilitate the electrification of public transit, school buses, and other light-, medium-, and heavy-duty vehicle fleets;	✓ 4.5 Fleet Charging ✓ 2.6 Summary of DTEE's 2019-2026 EV Programs ✓ 7.1 Equity Metric Outcomes
6g	Market barriers that the electric utility can address and other barriers that are beyond the electric utility's control, including any identified emerging challenges to transportation electrification and proposed solutions the electric utility plans to implement to overcome barriers where known;	✓ 2.4.7 Public Charging Landscape and Market Barriers ✓ 2.5 State and Federal Policies and Programs ✓ 3.3 Market Assessment ✓ 3.4 Stakeholder Engagement ✓ 4 TEP Portfolio
6h	Existing data on the availability and usage patterns of public charging stations including the number of direct current (DC) fast chargers located within the electric utility's service territory and the average 8760-hour load shapes over the last five years. Where similar data is available for level 2 chargers, this information should be included as well;	✓ 2.4.6 EV Peak Demand Forecast ✓ 2.4.7 Public Charging Landscape and Market Barriers ✓ 4.3 Public On-Route DC Fast Charging ✓ 5.5 Load Forecasting
6i	An electric utility must provide all of the data and a description of the methodology, tools, and software that were used to forecast the EV-related energy and demand that are included in its TEP. (i) This would include all independent forecasts for the number of EVs within an electric utility's service area at least five years into the future, the distribution of light-, medium-, and heavy-duty vehicles, and the kilowatt-hours/miles driven for each type of vehicle included within the forecast and the subsequent EV-related load shapes that are projected by the forecasting models utilized by the utility; (ii) Any data source that was used to inform the EV forecast model should be included in the TEP in a way that can be analyzed and verified by intervenors.	✓ 2.4.3 EV Adoption Forecast and Scenarios ✓ 2.4.4 EV Stock Forecasting Methodology, Tools and Data Sources ✓ 2.4.5 EV Energy Forecast ✓ 2.4.6 EV Peak Demand Forecast ✓ Appendix D Annual EV-Specific Consumption by Primary Charger Segment ✓ Appendix G Comparison of Charger Type, Rating and Utilization Rate by Customer Sub-Segment and TEP Report ✓ Appendix I DTEE EV Forecast
6j	A forecast of the number of public individual charging ports to be added over the next five years broken out by charger type and use case within the electric utility's service territory;	✓ 3.3 Market Assessment ✓ 4.3 Public On-Route DC Fast Charging ✓ 4.4 Workplace Charging
6k	An estimate of the number of light-, medium-, and heavy-duty EVs registered in the electric utility's service territory in each of the last five years;	✓ 2.4.1 Historical EV Registration Trends

Req. #	TEP Filing Requirement	Section of TEP
6l	A forecast of the number of light-, medium-, and heavy-duty EVs in the next five years as well as the source of the forecast data and methodology employed to produce the forecast; (i) In addition to the highest probability forecast the electric utility identifies, for the 2026 and 2028 TEP filings, a TEP must include a deployment scenario based on the State of Michigan's goal to build the infrastructure necessary to support two million EVs on Michigan roads by 2030. This scenario should consider efforts needed to deploy 100,000 chargers by 2030.	✓ 2.4.3 EV Adoption Forecast and Scenarios ✓ 2.4.4 EV Stock Forecasting Methodology, Tools and Data Sources ✓ 7.3 MI Future Mobility Plan Deployment Scenario
6m	A forecast of the electric load that will be directly attributable to the EVs within the electric utility's service territory over the next five years, as well as the source of the data used to create the forecast and a discussion of the methodology employed to create the forecast;	✓ 2.4.5 EV Energy Forecast ✓ 2.4.6 EV Peak Demand Forecast ✓ Appendix I DTEE EV Forecast
6n	Charging and vehicle technology updates that the electric utility expects will influence its forecasting and/or policy assumptions;	✓ 2.4.2 Charging and Vehicle Technology Trends ✓ 3.3 Market Assessment
6o	When a benefit-cost analysis is used in the development of the TEP, the methodology, analysis, and alternatives of the analysis shall be detailed. If the electric utility chooses to use scenario planning, it must discuss the analysis performed and present potential challenges under each scenario;	✓ 7.2 Benefit-Cost Analysis ✓ 7.3 MI Future Mobility Plan Deployment Scenario
6p	Customer education, outreach, and incentive programs that increase awareness of the programs and the benefits of transportation electrification and encourage greater adoption of EVs;	✓ 6.1 Education & Outreach
6q	An overview of any vehicle to grid or similar EV-related pilot programs and findings to date;	✓ 5.4 V2G Pilots ✓ 5.2 Summary of EV Managed Charging Efforts ✓ 6.2 Emerging Technology Fund

Req. #	TEP Filing Requirement	Section of TEP
6r	Strategies and measures for expanding transportation electrification among disadvantaged communities, low-income customers, and underserved communities including; (i) an analysis, to the extent available, of the adoption of plug-in electric vehicles or installation of charging stations by income; (ii) the utilization of both the EV Charging Justice40 map and the Michigan Department of Environment, Great Lakes, and Energy's Environmental Justice (EJ) Screening Tool (MiEJScreen) in the TEP's analysis and recommendations; (iii) list(s) of any programs currently in place to assist equitable adoption of EV charging infrastructure.	✓ 1.2 Summary of Recommendations ✓ 2.4.7 Public Charging Landscape and Market Barriers ✓ 4 TEP Portfolio ✓ 4.1 Residential ✓ 4.2 Multi-Unit Dwellings ✓ 4.3 Public On-Route DC Fast Charging ✓ 4.5 Fleet Charging ✓ 7.1 Equity Metric Outcomes
6s	Identification of key performance indicators for program success and how these indicators are utilized to further the success of the program.	✓ 7.4 Data, Reporting and Regulatory Compliance
7a	a TEP case is an informational docket only. Cost recovery for any part of the TEP shall only occur when it is proposed in the electric utility's subsequent rate case.	N/A
8a	Once a TEP is filed, interested persons will have 45 business days to submit initial comments;	N/A
8b	Interested persons will have 30 business days to submit reply comments;	N/A
8c	At its own discretion, the Commission Staff may hold a meeting with all interested persons to discuss the TEP and the accompanying comments;	N/A
8d	The Commission on its own motion may respond to a TEP following the reply comments; and	N/A
8e	Both Consumers Energy Company and DTE Electric Company have recently filed TEPs. The Commission Staff shall work with the companies to establish a process to allow for any interested person to comment on these plans.	N/A
9a	Each electric utility shall file an annual report of its progress in meeting the requirements and goals of its TEP. Reports must be filed in Case No. U-21538 by June 1 of each year following the electric utility's initial TEP. An electric utility with fewer than 100,000 customers may seek a waiver from this requirement;	✓ 7.4 Data, Reporting and Regulatory Compliance
10a	The Commission may amend these filing requirements as necessary	N/A
10b	At a minimum, the existing filing requirements shall be reviewed every three years	N/A

Req. #	TEP Filing Requirement	Section of TEP
10c	Any future changes will be posted in Case No. U-21538 with the opportunity for any interested person to comment on them	N/A

Appendix B Cross-Reference of Commission Guidance (Case No. U-21534)

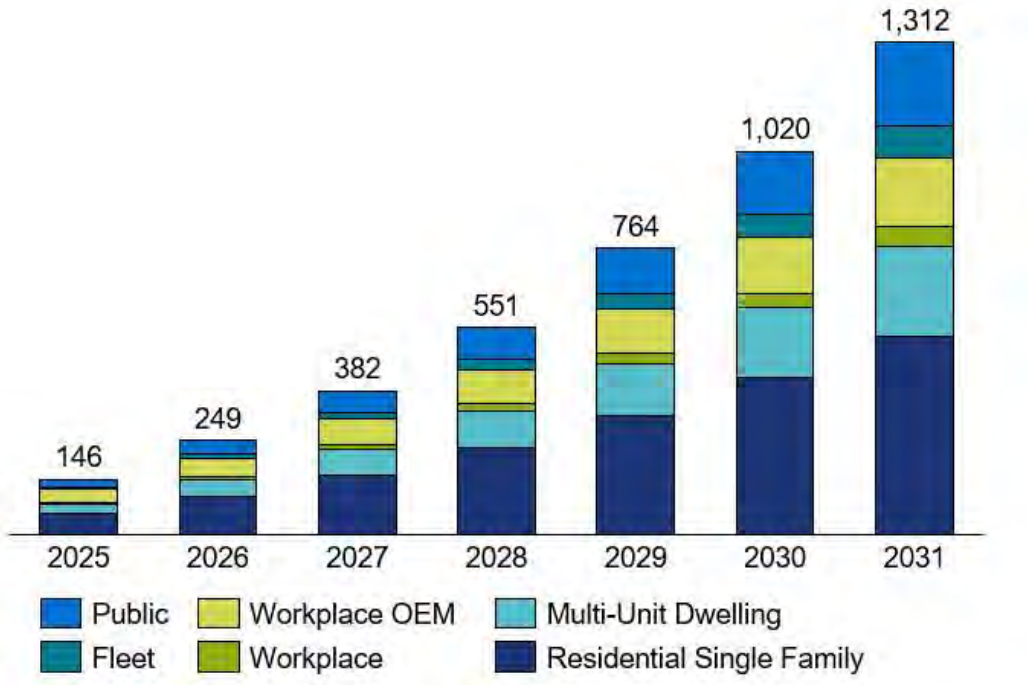
Commission Guidance Topic (U-21534)	Summary of Direction	Section of TEP
Begin execution of the approved TEP	• Formally transition away from its legacy Charging Forward program, and begin execution of its TEP starting in 2025	✓ 2.6 Summary of DTEE's 2019-2026 EV Programs
Rebate funding reallocation	• Reallocate any unused funding from the Business Charger Rebate program to Non-DAC/Rural On-Route Charger Rebates (January 2025 Order; page 326), and • Offer rebates for Public L2 Chargers (January 2025 Order; page 327)	✓ 1.2 Summary of Recommendations ✓ 4.3 Public On-Route DC Fast Charging ✓ 4.4 Workplace Charging
MUD customer interest	• Allow self-attestation of customer interest for parties requesting a MUD Charger Rebate (January 2025 Order; page 334)	✓ 4.2 Multi-Unit Dwellings
Tier-based School Bus charger rebates	• Investigate and analyze whether it would be beneficial to offer a charger output capacity tier-based School Bus Charger Rebates to schools that do not utilize bi-directional chargers (January 2025 Order; page 338)	✓ 4.5 Fleet Charging
Benefit-cost analysis methodology	• The Commission found "that DTE Electric's proposed TEP portfolio-level BCA is reasonable and prudent and should be approved." However, the Commission noted that an open-source BCA tool was being developed through Case No. U-20898 (January 2025 Order; pages 354-356).	✓ 7.2 Benefit-Cost Analysis

Appendix C Cross-Reference of Commission Guidance (Case No. U-21860)

Commission Guidance Topic (U-21860)	Summary of Direction	Section of TEP
Regulatory asset treatment for TEP rebate expenditures	• Approved extension of regulatory asset treatment for TEP rebate expenditures through 2028, consistent with the current TEP timeframe (February 2026 Order, p. 262).	✓ 4.7 Portfolio Summary
Rebate levels and subprogram reallocation	• Approved proposed rebate levels and reallocation of $4.39 million from the Non-DAC/Non-Rural On-Route DCFC subprogram to the Public Level 2 Charger subprogram for the 2025–2028 period (February 2026 Order, pp. 262–263).	✓ 4.4 Workplace Charging
TEP Information Technology investments	• Approved TEP Information Technology investments supporting data systems, dashboards, and enhanced reporting capabilities (February 2026 Order, p. 256).	✓ 6.4 TEP Information Technology (IT) Capabilities
TEP O&M expenditures	• Approved proposed TEP O&M expenditures, including Education & Outreach and Program Administration (February 2026 Order, pp. 258–259).	✓ 6.1 Education & Outreach ✓ 6.3 Program Administration
EV Utility Make-Ready capital spending and tracking	• Approved EV Utility Make-Ready capital spending for new service connections and directed the Company to track EV UMR costs and provide prior-year comparisons to support future forecasts (February 2026 Order, p. 109).	✓ 5.1 Distribution System Planning
Revenue-based cost allocation and enhanced NPV reporting	• Approved the revenue-based cost allocation methodology for the TEP, including enhanced reporting in the next rate case of total paid rebates, voltage levels by customer class, enhanced accounting for full net present value benefits, and amortization of TEP regulatory assets over a 10-year period (February 2026 Order, pp. 264–265, 323–324).	✓ 7.2 Benefit-Cost Analysis
Smart Charge pilot reporting and evaluation	• Directed the Company to provide additional detail in its next TEP regarding Smart Charge pilot performance, costs, and enrollment,	✓ 5.2 Summary of EV Managed Charging Efforts

Commission Guidance Topic (U-21860)	Summary of Direction	Section of TEP
	including comparison of managed versus unmanaged charging (February 2026 Order, pp. 265–267).	
One Big Beautiful Bill Act analysis	• Ordered the Company to include analysis in its next TEP regarding how the One Big Beautiful Bill Act may impact EV adoption and load within the Company's service territory (February 2026 Order, pp. 109, 255–256).	✓ 2.5.1 One Big Beautiful Bill Act (2025) – Analysis of EV Adoption and Load Impacts
Program design issues	• Reiterated that broader EV program design issues should be addressed in the Company's TEP proceeding rather than in general rate cases (February 2026 Order, pp. 258–260).	✓ 2.1 Scope and Purpose
Use of open-source BCA tool	• Directed the Company to utilize the Commission-developed open-source benefit-cost analysis tool once it becomes available in a future TEP or rate case filing (February 2026 Order, pp. 264–265).	✓ 7.2 Benefit-Cost Analysis
TEP filing and annual reporting requirements	• Reaffirmed compliance with updated TEP filing requirements and submission of the required TEP Annual Status Report, consistent with prior Commission direction (Case No. U-21492; reaffirmed in February 2026 Order).	✓ 7.4 Data, Reporting and Regulatory Compliance ✓ Appendix A Cross-Reference of TEP Filing Requirements (Case No. U-21492)

Appendix D Annual EV-Specific Consumption by Primary Charger Segment (GWh)



Appendix E Average Approximate Installation Costs by Charger Type and Segment, 2027-2031[105]

Type	Segment	Total Utility Make-Ready (UMR)	Customer Make-Ready (CMR)	EV Charger	Total Cost
L1 & L2	Residential	$320	$1,510	$520	$2,350
L2	Multi-Unit Dwelling	$1,320	$10,460	$2,000	$13,780
	Workplace	$1,240	$12,450	$2,860	$16,550
	Fleet	$1,210	$12,070	$2,810	$16,090
DCFC	School bus (60kW)	$23,390[106]	$60,650	$69,700	$153,740
	Transit Bus & other Fleet (150kW)	$23,390	$60,650	$69,700	$153,740
	On-route (150kW)	$23,390	$60,650	$73,370	$157,410

[105] Rounded to the nearest 10. DTEE data was used to define cost assumptions by charger segment and type. UMR including customer-owed CIAC (typically 15% of utility make-ready on average) and non-CIAC UMR for which DTEE is responsible

[106] School bus segment uses the average of tiered per charger output capacity (24Kw, 50Kw, 62.5Kw, 100Kw, 150Kw, 200Kw)

Appendix F List of Participating Stakeholder Organizations

EV Industry	Community Focused	Policy & Advocacy
1. Atwell	1. AATA	1. 5 Lakes Energy
2. Blink	2. Avista	2. Advanced Energy United
3. Bollinger Motors	3. BWATC	3. Alliance for Transportation Electrification
4. ChargeScape	4. City of Ann Arbor	4. CALSTART
5. Current Charging	5. CUB of Michigan	5. Center for Automotive Research
6. Daimler Truck	6. MDOT	6. Clean Energy Works
7. Detroit Voltage	7. Meijer	7. Clean Fuels Michigan (CFM)
8. Dunamis	8. Michigan Municipal League	8. Earthjustice
9. EcoG	9. Oakland County Commissioner(s)	9. Ecology Center
10. Electrification Coalition	10. Qmerit Electrification	10. Michigan Department of Environment, Great Lakes and Energy
11. Electrify America	11. SMART	11. Environmental Law Policy Center (ELPC)
12. EVgo	12. Small Business Association of Michigan (SBAM)	12. Electric Power Research Institute (EPRI)
13. Ford	13. University of Michigan	13. EV Noire
14. General Motors	14. UCS Union of Concerned Scientists	14. ICF
15. Highland Electric Fleets		15. MichAUTO
16. IBEW		16. Michigan Energy Innovation Business Council (MEIBC)
17. Jule Power		17. Michigan Public Service Commission (MPSC) staff
18. Oscar W Larson (OWL Services)		18. Natural Resources Defense Council (NRDC)
19. Phoenix Contact		19. River Oak Law
20. Solutions for Energy Efficient Logistics (SEEL)		20. Rocky Mountain Institute (RMI)
21. Stellantis		21. Sierra Club
22. SWTCH		22. Michigan Alliance (MEVA)
23. Weavegrid		23. Vehicle-grid Integration council (VGIC)
24. Veloz		24. Vote Solar
25. Detroit Diesel		25. Office of Future Mobility Electrification (OFME)

Appendix G Comparison of Charger Type, Rating and Utilization Rate by Customer Sub-Segment and TEP Report

Charger Type	Sub-Segment	Charger Ratings (kW)		Utilization Rates	
		Prior TEP	Revised TEP	Prior TEP	Revised TEP
L1	Residential	n/a	1.9	n/a	16%
L2	Residential	12	9.4	2%	4%
	Multi-unit dwelling (MUD)	12	9.6	6% LI 9% non-LI	10%
	Workplace	19	9.6-11.5	5%	6%
	Fleet	19	11.5	7%	12%
DCFC	School bus	60	24-200	4%	5%[3]
	Transit bus	150	150	14%	12%
	Other Fleet	150	150	5%	2%
	Public-On-route	150	150	2% DAC 4% non-DAC	5%

Appendix H Comparison of Rebate Levels and Costs per TEP Year

Charger Type	Sub-Segments Supported	Rebate Amount ($)		Non-CIAC UMR[107]($)	
		Prior	Revised	Prior	Revised
Level 1&2	Low-income Residential	2,200	2,000	196	268
	Moderate Income Residential	n/a	**1,500**	n/a	
	Other Residential	n/a	**500**	n/a	
Level 2	Low-income (MUDs)	14,400	14,400	1,156	1,127
	All other MUDs	5,000	5,000		
	Workplace	2,500	**3,750**	281	1,057
	Fleet-Other	2,500	**5,000**	884	1,026
DCFC	Public on-route (DAC/rural)	70,000	70,000	17,536	19,882
	Public on-route (all other)	50,000	50,000		
	Fleet-Other	70,000	**25,000**	14,025	
	School Bus	70,000	**17,000-100,000**	14,034	
	Transit Bus	70,000	100,000		

[107] Customer-owed CIAC costs are excluded and assumed to be 15% of total utility make-ready costs. See Appendix E for total infrastructure cost details.

Appendix I DTEE EV Forecast

In support of Appendix A, Section 6i of the Commission's TEP filing requirements, this appendix provides the data, inputs, and methodological details used to develop DTEE's highest-probability EV adoption, energy, and demand forecasts. Consistent with Appendix A, Section 6i(ii), all data sources used to inform the EV forecast are documented in a manner that enables review and verification by intervenors.

This appendix provides the underlying data sources used to project DTEE EV adoption forecast, vehicle mix, energy intensity, load shapes and associated system impacts as required by the MPSC TEP Filing Requirements. Information found within the appendix is outlined in the table below and can be found at the following location https://dteenergy.com/content/dam/dteenergy/deg/website/residential/electric/pev/AppendixI_EV_Forecast.xlsx

Section	Description
EV Sales	Incremental and Cumulative Number of Electric Vehicles in DTEE's Service Territory by Vehicle Segment
VMT	Vehicle Miles Traveled by Vehicle Segment
Intensities	Electric Intensity by Vehicle Segment in kWh per mile
kWH per Car	KWh per Vehicle by Vehicle Segment
Load Forecast	Charger Forecast, Class Allocations, and the Sales Forecast by Vehicle Segment used to Develop the Class Sales Forecast
Residential L2 Input Shapes	Raw Loadshapes used for L2 Weighting Reflecting Different Home Charging Strategies in kWh/Customer. Includes Weighted Aggregate Shape.
Residential L2 Weights	Response from the Appliance Saturation Survey to Create Weighted Aggregate L2 Shape
Hourly EV Shapes	Final Load shapes Utilized for Peak Demand and Hourly Modeling by Segment in MW. Includes Seasonal Impacts.

The Confidential External Market Share and Vehicle Sales information that this Appendix leverages can be found in the Company's soon to be filed 2026 Electric Rate Case No. U-22046 attachment NDA U-22046 Part III Att. 3.18 External Market Share and Vehicle Sales.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion, to open a docket for certain regulated electric utilities to file transportation electrification plans and for other related matters.	)))))	Case No. U-21538

PROOF OF SERVICE

ESTELLA BRANSON states that on April 22, 2026, she served a copy of the DTE Electric Company's Transportation Electrification Plan in the above captioned matter, via electronic mail, upon the persons listed on the attached service list.

Estella R. Branson Digitally signed by Estella R. Branson
Date: 2026.04.22 17:13:13 -04'00'

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