



It's Electric, LLC
Brooklyn Navy Yard
Building 128
19 Morris Ave.
Brooklyn, NY 11205

October 11, 2024

Good afternoon Mr. King,

This letter comprises our thoughts on the matter of DTE's unwillingness to authorize the installation of electrical infrastructure for It's Electric EV Chargers at the two locations in the City of Detroit.

From our point of view, the electrical feed for the EV Chargers is comprised of a branch circuit originating from the load side of the private customers electrical distribution equipment and not connected to the service side of the distribution equipment which is feed from the host utilities (DTE) distribution equipment.

From what we've determined is that there are no requirements, rules, or regulations that categorizes an electrical circuit as a *Utility or Premise* wiring based on the physical path that the circuit takes from source to load, but rather where the circuit originates and terminates.

In this instance the EV Charger is being feed downstream of the customers electrical distribution panel and therefore by definition, would be considered Premise wiring.

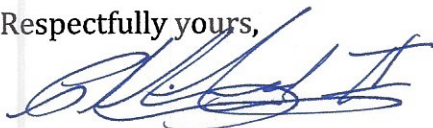
With this type of circuit configuration, the electrical circuit infrastructure and the EV Charger supplied by It's Electric would be designated as premise for both wiring and equipment by both the NESC and NCE, and thereby the local utility (DTE) has no jurisdiction over this type of installation, this would be the purview of the Local Public Works Authority and in this case that would fall to the City Of Detroit Engineering Division.

The City of Detroit Engineering Division; a part of the City of Detroit Department Public Works, has complete jurisdiction over installations such as this involving non-utility entities wishing to install equipment or other physical appliances that encroach on the public right-of-way.

For further support, see the following weblink from the City of Detroit Web Site:

<https://detroitmi.gov/departments/department-public-works/right-way-permits-and-standards>

Respectfully yours,

A handwritten signature in blue ink, appearing to read 'Phares A. Noel II', written over the typed name.

Phares A. Noel II, Ph.D., PE

Managing Member
Diversified Engineering Concepts, LLC
Detroit, Michigan