

December 16, 2024

Electronically Submitted via MiEnviro

Ms. Bonnie Broadwater Michigan Department of Environment, Great Lakes, and Energy Water Resources Division 350 Ottawa Avenue NW, Unit 10 Grand Rapids, MI 49503-2316

RE: NOTICE OF PLANNED PARTICIPATION ANNUAL PROGRESS REPORT PURSUANT TO 40 CFR 423.19(g)(3) CONSUMERS ENERGY COMPANY, JH CAMPBELL COMPLEX NPDES PERMIT NO. MI0001422, STEAM ELECTRIC EFFLUENT LIMITATION GUIDELINES

Dear Ms. Broadwater,

Consumers Energy Company (Consumers) submitted a Notice of Planned Participation (NOPP) for the JH Campbell (Campbell) Complex, NPDES Permit No. MI0001422 on October 11, 2021, seeking to qualify as an electric generating unit that will achieve permanent cessation of coal combustion by December 31, 2028. According to 40 CFR 423.19 (g)(3) annual progress reports shall be submitted detailing the progress made to achieve the cessation of coal use. Consumers is submitting the following information to support the requirements for Campbell Units 1, 2, & 3 that will achieve permanent cessation of coal combustion by December 31, 2028.

Pursuant to 40 CFR 423.19 (g)(4), an annual progress report shall detail the completion of any interim milestones listed in the NOPP since the previous progress report, provide a narrative discussion of any completed, missed, or delayed milestones, and provide updated milestones. An updated timeline, to reflect the requirements of 40 CFR 423.19(f)(4), is included in Attachment A. A copy of the official retirement filing as required under 40 CFR 423.19(f)(4)(ii), is included in Attachment B.

If you have any questions or need additional information, please do not hesitate to contact Rachel Proctor at (517) 788-1429 or by email at <u>Rachel.proctor@cmsenergy.com</u>.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true,

Consumers Energy 1945 W. Parnall Road Jackson, MI 49201 www.consumersenergy.com

Environmental Quality & Sustainability



accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Nathan J. Hoffman Consumers Energy Executive Director of Fossil Generation

Electronically Distributed

CC: Ms. Rachel Proctor, Consumers Energy Company Ms. Kristin Melcher, Consumers Energy Company, Campbell



Attachment A Permanent Cessation Timeline Update

ACTIVITY – INTERIM MILESTONE	PROJECTED DATE OF COMPLETION	STATUS	NOTES
NOPP Submittal	10/13/2021	COMPLETE	
Expected Integrated Resource Plan (IRP) Approval by the MPSC	6/27/2022	COMPLETE	12/16/2022: The IRP was approved on June 23, 2022. A copy of the most recent integrated resource plan for which the applicable state agency approved the retirement of the unit subject to the Effluent Limitation Guidelines (ELGs), pursuant to 40 CFR 423.19(f)(2), was included as Attachment B in the 2022 Annual Progress Report.
Expected MISO Study Results	3/11/2022	COMPLETE	12/15/2023: MISO approved the suspension of Campbell Units 1, 2, & 3 effective June 1, 2025, on March 11, 2022
Cold & Dark ¹ Outage Specifications Finalized	4/22/2024 7/18/2024	COMPLETE	12/16/2022: Cold and Dark outage specifications are delayed; however, the delay in these final specifications will not impact Campbell Units 1, 2, and 3 retirement schedule, which are still expected to retire in 2025 consistent with the NOPP. The delay is due to the difference between the initial conceptual schedule and the refined project schedule.



ACTIVITY – INTERIM MILESTONE	PROJECTED DATE OF COMPLETION	STATUS	NOTES	
Cold & Dark Contract Award	1/26/2025 12/19/2024	ON SCHEDULE	12/16/2022: Change in date is due to the difference between the initial conceptual schedule and the refined project schedule.	
MPSC ² and MISO ³ approved Unit 1, 2, & 3 Retirement; Cold & Dark Outage Start	5/31/2025 6/1/2025	ON SCHEDULE	12/10/2024: Suspension of Campbell Units 1,2 & 3, effective June 1, 2025. See Attachment B. 10/11/2021: 5/31/2025 is the expected date that JH Campbell Units 1, 2, and 3 will no longer generate electricity	
Cold & Dark Outage Complete	9/6/2025 8/31/2025 10/31/2025	ON SCHEDULE	12/14/2023: The change in date will not impact Campbell Units 1, 2, and 3 retirement schedule. 10/11/2021: JH Campbell Units 1, 2, and 3 will be deenergized and ready for AD&D. The change in date is due to the difference between the initial conceptual schedule and the refined project schedule.	

Notes:

- (1) "Cold & Dark" refers to a period of time where preparations are put in place for Abatement, Decommissioning & Demolition (AD&D).
- (2)
- MPSC is the Michigan Public Service Commission MISO is the Midcontinent Independent System Operator (3)



Attachment B Official Filing Pursuant to §423.19(g)(4)(ii)



A CMS Energy Company

Timothy J. Sparks, P.E. Vice President Electric Grid Integration

VIA Electronic Mail

December 14,2021

Andrew Witmeier Director of Resource Utilization Midcontinent Independent System Operator, Inc. 720 City Center Drive Carmel, IN 46032

Re: Suspension of Campbell Units 1, 2 & 3

Dear Mr. Witmeier:

Consumers Energy Company ("Company") hereby provides notice to the Midcontinent Independent System Operator, Inc. ("MISO") that it intends to suspend Campbell Units 1, 2 and 3 effective June 1, 2025. Attached is the notice of such intent in accordance with Section 38.2.7 and Attachment Y of MISO's Open Access Transmission, Energy and Operating Reserve Markets Tariff ("Tariff").

Campbell Unit 3 is jointly owned by the Company (93.3%), CPNode CONS.CAMPBELL3, Michigan Public Power Agency (4.8%), CPNode CONS.CA3.MPPA, and Wolverine Power Supply Cooperative (1.9%), CPNode CONS.CA3_WPSC. The Company attests that, pursuant to the relevant Operating Agreements, it is authorized to submit this Attachment Y notice on behalf of all Campbell Unit 3 owners.

In the event you have any questions regarding this matter, please contact Kathy Wetzel at (517) 788-2039.

Regards.

Timothy J. Sparks Vice President Electric Grid Integration Consumers Energy Company 1945 W. Parnall Rd. Jackson, MI 49201

Cc: Kathy Wetzel Thomas Clark

ATTACHMENT Y

Notification of Generation Resource/SCU/Pseudo-tied Out Generator

Change of Status,

Including Notification of Rescission

This is a notification of change of status of a Generation Resource, Synchronous Condenser Unit

("SCU"), or Pseudo-tied out Generator in accordance with Section 38.2.7.a of the Tariff. An

electronic copy of the completed form will be accepted by the Transmission Provider, however, a

form will not be considered complete until the original form containing an original signature,

including all attachments, is received by the Transmission Provider at the following address:

MISO, Attention: Director of Transmission Planning; 720 City Center Drive, Carmel, IN 46032.

The Transmission Provider may request additional information as reasonably necessary to

support operations under the Tariff.

Owner of the Generation Resource, SCU or Pseudo-tied out Generator: Consumers Energy Company (see attached letter re: Campbell Unit 3)

Name of Market Participant: Consumers Energy Company - NERC ID: CETR Owner's state of organization or incorporation Michigan

Generation Resource/SCU/Pseudo-tied Out Generator [plant and unit number(s)] Campbell Units 1, 2 & 3

Source/Identification of Generation Interconnection Service [name of agreement, parties, date, date filed and docket number, and any other information to identify an agreement] <u>CAMPBELL</u> <u>UNITS 1+2</u>: UMBRELLA GIA BETWEEN CONSUMERS, METC+MISO FERC DOCKET ER21-999. CAMPBELL UNIT3: FERC DOCKET ER06-1441 FOR MISO SERVICE AGREEMENT NO. 1755.

Effective On: July 16, 2018

Pursuant to the terms of the MISO Tariff, Owner hereby certifies that it will

Suspend for economic reasons operation of all or a portion of the Generation Resource/SCU/Pseudo-tied out Generator commencing on <u>1st</u> [day] of <u>June</u> [month] of ²⁰²⁵ [year]

[] Rescind the current notice to SuspendThe facility is further described as follows:

Location: West Olive, Michigan

Unit Name Campbell Unit 1	CPNode (if applicable) cons.CAMPBELL1	Nameplate Capacity(MW) 260	Change in Capacity(MW) 260
Campbell Unit 2	CONS.CAMPBELL2	360	360
Campbell Unit 3	CONS.CAMPBELL3	844	844
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Owner understands and agrees that this notification is provided in accordance with Section 38.2.7 of the Transmission Provider's Tariff and will not be made public by the Transmission Provider except as provided for under Section 38.2.7 of the Tariff.

The undersigned certifies that he or she is an officer of the owner of the Generation Resource/SCU/Pseudo-tied out Generator, that he or she is authorized to execute and submit this notification, and that the statements contained herein are true and correct.

Signature OTHY **Contact Information** Name: T J. Email: TIMOTHY SPARKS GOCMSENER & COM ELECTRIC GRID INTEGRATION Title: V Phone: 51 Date:



Andrew Witmeier Director, Resource Utilization 317-249-5585 awitmeier@misoenergy.org

VIA OVERNIGHT DELIVERY

March 11, 2022

Timothy J. Sparks Vice President, Electric Grid Integration Consumers Energy Company 1945 W. Parnall Rd. Jackson, MI 49201

Subject: Approval of Campbell Units 1,2 &3 Attachment Y Suspension Notice

Dear Mr. Sparks,

On December 14, 2021, Consumers Energy Company submitted an Attachment Y Notice to MISO for the suspension of Campbell Units 1,2 & 3, effective June 1, 2025. After being reviewed for power system reliability impacts as provided for under Section 38.2.7 of MISO's Open Access Transmission, Energy, and Operating Reserve Markets Tariff ("Tariff"), the suspension of Campbell Units 1,2 & 3 would not result in violations of applicable reliability criteria. Therefore, Campbell Units 1,2 & 3 may suspend without the need for the generators to be designated as a System Support Resource ("SSR") units as defined in the Tariff.

As there were no reliability criteria violations, MISO will continue to preserve the confidentiality of the Attachment Y Notice.

Please do not hesitate to contact me if you have any questions regarding this matter.

Respectfully,

Andrew Witmeier Director, Resource Utilization

1700 Centerview Drive Little Rock, AR 72211