

October 24, 2024

Ms. Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 West Saginaw Highway
Post Office Box 30221
Lansing, MI 48909

Re: MPSC Case No. U-20147 – In the matter, on the Commission’s own motion, to open a docket for certain regulated electric utilities to file their five-year distribution investment and maintenance plans and for other related, uncontested matters.

Dear Ms. Felice:

Enclosed for electronic filing in the above-captioned proceeding, please find **Consumers Energy Company’s Comments on Case No. U-20147 Straw Proposal**.

This is a paperless filing and is therefore being filed only in PDF. Also included is a Proof of Service showing electronic service upon the parties.

Sincerely,

Bret A. Totoraitis
Phone: 517-788-0835
Email: bret.totoraitis@cmsenergy.com

cc: Parties per Attachment 1 to Proof of Service

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 their five-year distribution investment) Case No. U-20147
and maintenance plans and for other related,)
uncontested matters.)
_____)

**CONSUMERS ENERGY COMPANY’S
COMMENTS ON CASE NO. U-20147 STRAW PROPOSAL**

I. INTRODUCTION

On September 26, 2024, the Michigan Public Service Commission (“MPSC” or the “Commission”) issued an Order in Case No. U-20147 (“September 26 Order”). This order provided the Commission’s straw proposal (“straw proposal”) for a standard approach for future distribution plan filings submitted by each Michigan rate-regulated utility (“utility”). The straw proposal referenced prior Commission orders for content to be included in distribution plans, as well as prior interested party comments and discussion with utilities. Consumers Energy Company (“Consumers Energy” or the “Company”) has reviewed the Order filed and sees a clear benefit of establishing a standard set of information to be provided in future distribution plans and appreciates the opportunity to provide comments on the Commission’s Straw Proposal. The Company offers the following comments for consideration:

II. COMMENTS

1. Overlay Maps of Planned Distribution System Investment Should Be Considered as Modified by the Company

The straw proposal requests “Overlay maps of planned and historic distribution system investments” on page 149, but leaves open any definition of what the ‘historical’ or ‘planned’

timeframe would be. The Company sees value in GIS mapping technology and has been expanding its data sharing with the MPSC to facilitate the distribution of this data. Given the three-year filing cycle proposed in the September 26 Order, the Company offers the following recommendation for map sharing.

Historical Overlay Maps refer to the three historical years prior to the utility’s last filed plan with a start date of January 1, 2024: The Company began scaling its GIS mapping capabilities in 2023; however, complete GIS data for distribution investment prior to calendar year 2024 is limited. Providing investment maps prior to 2024 would offer only a partial picture of the Company’s distribution projects and could lead to incorrect narratives or conclusions about the Company’s investments. Furthermore, three years of historical data meets the stated goal of providing recent system characteristics, health, and operations while removing any possible gap in historical investment reporting in future plans. For example, a utility ordered to file their next distribution plan in 2027, would be required to show their historical investments from 2024, 2025, and 2026 in their plan as shown in Figure 1 below.

Figure 1: Proposed Historical Overlay Map Data

Historic Year Data	2024	2025	2026	2027	2028	2029	2030
Distribution Plan	Filed in 2027			Filed in 2030			Filed in 2033

Planned Overlay Maps refer to the year of and the two years following the utility’s current filed plan for a total of three years: Overlay maps of planned investment should balance the spirit of forward-looking investment with a utility’s capacity and reasonable accuracy. While distribution plans provide a five-year outlook for investments, project-based grid planning from the utility’s perspective is dynamic and must be responsive to ever-changing factors such as storm damage, wildfires, economic development and growth, transportation electrification, and rate

recovery. Furthermore, the Company is in the process of developing a comprehensive distribution asset management and strategy system that requires several years to become fully operational. These factors will redirect any distribution investment plan, which calls into question the benefit of providing investment maps more than two years in advance. Despite these challenges, the Company sees value in providing a forward-looking visual representation supporting a utility’s plan to address reliability, resilience, and safety for the two years following a utility’s distribution plan as well as the year of filing beginning in 2027. For example, a utility ordered to file their next distribution plan in 2027 would be required to show their planned investments from 2027, 2028, and 2029 in their plan as shown in Figure 2 below. It should be understood that any forward-looking plan beyond the test year of a regularly scheduled electric rate case is a snapshot in time of the Company’s plans and is likely subject to change based on the various factors described earlier.

Figure 2: Proposed Planned Overlay Maps Data

Planned Year Data	2027	2028	2029	2030	2031	2032	2033
Distribution Plan	Filed in 2027			Filed in 2030			Filed in 2033

2. Historical Safety Incidents Involving Electric Facilities Should Be Aligned with Form 2842 and Give Clear Timeframe

The straw proposal requests “Historical Safety Incidents Involving Electric Facilities” on page 148 but does not state what a historical timeframe should be. The Company is happy to provide the Electric Contact Summary data already reported to the MPSC through its Form 2842 which provides all the fields outlined in the straw proposal on incidents where individuals contact the Company’s electric distribution assets. To align with historical overlay maps, the Company

suggests a three-year historical look back of these safety incidents from the year of the ordered distribution plan similar to the timeline detailed in Figure 1 above.

3. Data on the Condition of Distribution System Assets Should Be Considered as Modified by the Company

The straw proposal requests that utilities, “Provide relevant data on its distribution system assets [including] condition (such as failure rates, outage/interruption causes, and quantifiable impacts from extreme weather events)” on page 148. The Company interprets relevant data as a categorical summary of assets by class rather than an individual asset by asset inventory which would require thousands of pages of data that would be difficult to review, much less analyze. The Company monitors the operational health metrics of the electric distribution system including data that summarizes the health, key risks, location, and planned work dates for the worst performing asset classes. Classes contain broader asset categories such as high voltage distribution (HVD) and low voltage distribution (LVD), lines (including pole top components, cross-arms, and poles), substations, transformers, and metro system assets.

4. The Commission Should Modify the Proposed Protective Order to Better Reflect that Electric Distribution Plans Are Not Contested Case Proceedings

The Commission’s September 26 Order directed the MPSC Staff (“Staff”) to file a proposal for a standard Protective Order by October 10, 2024. The Commission’s directive is related to Staff’s recommendation that the Commission should require utilities to provide “all supportive data used in the creation of the distribution plans” in future iterations of the Electric Distribution Plans and that the same data should be made available to stakeholders that intended to participate in the docket by filing comments or reply comments and, further, that such data should be “subject to typical confidentiality procedures.” September 26 Order, page 24. Staff timely filed a proposed standard Protective Order.

In many respects, the Protective Order proposed by Staff is consistent with standard Protective Orders used in rate cases and other proceedings before the Commission. However, due to the fact that Electric Distribution Plan dockets are not contested cases, it was necessary and appropriate to make adjustments to those existing Protective Orders. Although it is clear that Staff made some adjustments, Consumers Energy believes that additional adjustments are necessary to properly conform the proposed standard Protective Order to a comment-case environment. Consumers Energy has prepared a redlined version of Staff's proposed Protective Order, attached as Attachment A, that proposes revisions that reflect the adjustments the Company believes are necessary to make the Protective Order fit the context of these comment proceedings.

There are two main adjustments that Consumers Energy proposes. First, the current draft fails to recognize that the process for making the Commission aware of the participation of particular stakeholders and their legal counsel is not like the process in contested case proceedings. There are no appearances of counsel or filed interventions that facilitate making an interested stakeholder a formal part of the comment process. An adjustment to the proposed Protective Order is necessary to account for this difference. For example, the Protective Order defines a "Party" as "the Utilities, MPSC Staff ('Staff'), Michigan Attorney General, or any other person, company, organization, or association, as defined in R792.10402(k) and (l), that files distribution investment and maintenance plans, comments, or reply comments in this Commission docket." That means that most interested stakeholders will only become "Parties" eligible to seek access to the confidential materials under the terms of the current Protective Order *after* their comments are filed even though they will likely desire access to the confidential materials *before* their comments are filed. Similarly, the definition of "Reviewing Representative" refers to an attorney "who has entered an appearance in this proceeding for a Receiving Party." Attachment A includes a revision

to the definition of “Party” to include stakeholders who inform the Commission of their intent to submit comments and a revision to the definition of “Reviewing Representative” to simply include an attorney who represents a Party in the proceeding.

Second, it is important to recognize that the confidential data supporting each utility’s Electric Distribution Plan will typically be disclosed, in the first instance, as a part of the utility’s filed Electric Distribution Plan – not through discovery, since these are not contested cases and there is no traditional discovery available. Therefore, the Commission and Staff will be in possession of the confidential data associated with each Plan and will conceivably – perhaps even likely – be approached directly by potential commenters who wish to receive and review the confidential data filed by the utilities. To address this situation, the Company proposes that the Protective Order should require potential commenters seeking access to the confidential data to submit a copy of their Nondisclosure Certificates to both the Disclosing Party (typically the utility) and the Commission. That process will help ensure that both the utilities and the Commission have appropriate awareness of who has met the criteria for receiving the confidential data.

In addition to these proposals, Attachment A proposes a small number of additional adjustments where language in the current proposed Protective Order refers to contested case procedures that are not applicable to these comment proceedings. The Company requests the Commission to modify Staff’s Protective Order proposal consistent with the redlines shown in Attachment A.

Consumers Energy appreciates that opportunity to comment on the straw proposal offered.

Respectfully submitted,

CONSUMERS ENERGY COMPANY

ATTACHMENT A

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

MPSC Case No. U-20147

PROTECTIVE ORDER

This Protective Order governs the use and disposition of Protected Material that any utility files in this docket as part of its distribution investment and maintenance plan, and governs the use and disposition of said Protected Material in any docket the Commission may assign in the future to address individual utility distribution investment and maintenance plans. This Protective Order protects non-public, confidential information and materials so designated by the Disclosing Party as Protected Material, as defined herein. Accordingly, it is ordered:

I. “Protected Material” and other definitions

“Protected Material” consists of trade secrets or confidential, proprietary, or commercially sensitive information provided in Disclosing Party’s distribution investment and maintenance plans, related exhibits, comments or reply comments, ~~any witness’ related exhibits and testimony~~, motions, objections, briefing, responses to an order issued by the presiding hearing officer or the Michigan Public Service Commission (“MPSC” or the “Commission”). Subject to challenge under Paragraph IV.A, Protected Material shall also consist of non-public confidential information

and materials including, but not limited to, the following information disclosed in this docket as part of a utility's distribution investment and maintenance plan, comments on such plans by interested parties, and replies thereto if it is marked as required by this Protective Order:

1. To the extent permitted, information obtained under license from a third-party licensor, to which the Disclosing Party or witnesses engaged by the Disclosing Party is a licensee, that is subject to any confidentiality or non-transferability clause. This information includes reports; analyses; models (including related inputs and outputs); trade secrets; and confidential, proprietary, or commercially sensitive information that the Disclosing Party or one of its witnesses receives as a licensee and is authorized by the third-party licensor to disclose consistent with the terms and conditions of this Protective Order.
2. Information that is protected as confidential in another jurisdiction that the Utility provides utility service, and the source of the other jurisdiction's protective designation is made known to the Receiving Party.

B. The information subject to this Protective Order does not include:

1. Information that is or has become available to the public through no fault of the Receiving Party or Reviewing Representative and no breach of this Protective Order, or information that is otherwise lawfully known by the Receiving Party without any obligation to hold it in confidence;
2. Information received from a third party free to disclose the information without restriction;
3. Information that is approved for release by written authorization of the Disclosing Party, but only to the extent of the authorization;

C. Information that is required by law or regulation to be disclosed,

but only to the extent of the required disclosure; or Information that is disclosed in response to a valid, non-appealable order of a court of competent jurisdiction or governmental body, but only to the extent the order requires. "Disclosing Party" means a Party producing Protected Material in this proceeding.

D. “Party” refers to the Utilities, MPSC Staff (“Staff”), Michigan Attorney General, or any other person, company, organization, or association, as defined in R792.10402(k) and (l), that **informs the Commission of its intent to files** distribution investment and maintenance plans, comments, or reply comments in this Commission docket **and submits at least one Nondisclosure Certificate to a Disclosing Party and to the Commission.**

F. “Receiving Party” means any Party to this proceeding who requests or receives access to Protected Material. A Receiving Party is responsible for assuring that persons, representatives, or agents under its control or supervision comply with this Protective Order.

G. “Reviewing Representative” means a representative of the Receiving Party who is:

1. An attorney ~~who has entered an appearance in this proceeding for representing~~ a Receiving Party **in this proceeding**;
2. An attorney, paralegal, or other employee associated, for the purpose of this case, with an attorney described in Paragraph I.G.1;
3. An expert or employee of an expert retained by a Receiving Party to advise, ~~or~~ prepare for, ~~or testify in~~ this proceeding; or an employee or other representative of a Receiving Party with significant responsibility in this case.

H. “Nondisclosure Certificate” refers to Attachment 1 to this Protective Order. Except as otherwise provided herein, the Receiving Party and Reviewing Representatives will be required to sign Nondisclosure Certificates and provide copies of the same to the ~~utility~~ **Disclosing Party and the Commission** in order to access Protected Material. However, Nondisclosure Certificates will not be required from administrative law judges, members of the Commission and its support staff, Staff

(excluding consultants, third-party experts, agents or other similar persons), and Staff counsel, for whom by virtue of their employment are presumed to be bound by the terms of this Protective Order.

II. **Access to and Use of Protected Material**

A. This Protective Order governs the use of all provided Protected Material. This Protective Order protects: (i) the Protected Material; (ii) any copy or reproduction of the Protected Material made by any person; and (iii) any memorandum, handwritten notes, or any other form of information that copies, contains, or discloses Protected Material. All Protected Material in the possession of a Receiving Party and a Reviewing Representative shall be maintained in a secure place. Access to Protected Material shall be limited to the Receiving Party and the Reviewing Representative, after each has executed the Nondisclosure Agreement and provided a copy of the Nondisclosure Agreement to the Disclosing Party, subject to the limited exception in Paragraph I.H.

B. Protected Material must be used and disclosed by the Receiving Party solely in accordance with the terms and conditions of this Protective Order. A Receiving Party and Reviewing Representative may analyze the Protected Material; ~~make or respond to discovery; present evidence;~~ prepare ~~testimony~~ comments, ~~argument~~ reply comments, motions, briefs, or other ~~filings in this proceeding or an appeal from this proceeding~~. A Reviewing Representative shall not release or disclose the content of Protected Material to any other person or use the information for any other purpose.

C. The Disclosing Party may request the Receiving Party withhold certain information from a Reviewing Representative and retains the right to object to any designated Reviewing Representative if the Disclosing Party has reason to believe that there is an unacceptable risk of misuse of confidential information. If a Disclosing Party objects to a Reviewing Representative, then the Disclosing Party shall submit the dispute to the Commission, or designated hearing officer, simultaneously upon objection. If the Disclosing Party notifies a Receiving Party of an objection to a Reviewing Representative, then the Protected Material shall not be provided to that Reviewing Representative until the objection is resolved by agreement or by the Commission or designated hearing officer.

D. If a Receiving Party seeks access to Critical Energy Infrastructure Information (“CEII”) as defined in 16 U.S.C § 824o-1(a)(3) and FERC rules, specifically 18 CFR § 388.113(c), the Receiving Party and Reviewing Representative shall also sign the CEII Nondisclosure Certificate (Attachment 2 to this Protective Order) and provide a copy of the executed CEII Nondisclosure Certificates to the Disclosing Party **and the Commission**.

E. The obligations under this Protective Order do not expire by a Commission order closing this docket and are enforceable by the MPSC or a court of competent jurisdiction. To the extent Protected Material is not returned to a Disclosing Party, it remains subject to this Protective Order. Members of the Commission, Commission staff assigned to assist the Commission with its deliberations, and the presiding hearing officer shall have access to all Protected Material that is submitted to the Commission under seal.

F. A Party retains the right to seek further restrictions on the dissemination of Protected Material to persons who have or may subsequently seek to participate in this MPSC proceeding, or a future MPSC proceeding in which this Protected Material is at issue.

III. **Procedures**

A. The Disclosing Party shall identify what portion(s) of any document designated confidential it considers confidential. This can be done through highlights or other clear identifier. The Disclosing Party must mark any information that it considers confidential as “CONFIDENTIAL: SUBJECT TO THE PROTECTIVE ORDER ISSUED IN CASE NO. UXXXXX.” Software executable files containing Protected Material may not be capable of being marked with the foregoing required protective language. The inability to mark software executable files containing Protected Material with such protective language shall not diminish the requirements of this Protective Order. It shall be sufficient if the medium used to deliver software executable files containing Protected Material is marked with the required protective language. However, any output from the software executable files containing Protected Material that is generated only as a reproducible document, whether electronic or non-electronic, that is capable of being marked with the required protective language, shall be marked by the party who generated the output with such protective language and subject to the requirements of this Protective Order. If the Receiving Party or a Reviewing Representative makes copies of any Protected Material, they shall conspicuously mark the copies as Protected Material. Notes of Protected Material shall also be conspicuously marked as Protected Material by

the person making the notes.

B. If a Receiving Party wants to quote, refer to, or otherwise use Protected Material in pleadings, exhibits, comments, reply comments, or in some other form in this proceeding (including administrative or judicial appeals), the Receiving Party shall do so consistent with procedures that will maintain the confidentiality of the Protected Material. For purposes of this Protective Order, the following procedures apply:

1. Written submissions using Protected Material shall be filed in a sealed record to be maintained by the MPSC's Docket Section, or by a court of competent jurisdiction, in envelopes clearly marked on the outside, "CONFIDENTIAL – SUBJECT TO THE PROTECTIVE ORDER ISSUED IN CASE NO. U-XXXXX." Simultaneously, identical documents and materials, with the Protected Material redacted, shall be filed and disclosed the same way that distribution investment and maintenance plans, comments, reply comments, evidence or briefs are usually filed; and,

2. Copies of the documents filed with the MPSC which contain Protected Material, including the portions of the distribution investment and maintenance plans, comments, reply comments, or related exhibits that refer to Protected Material, shall be marked or identified as, "CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER IN CASE NO. U-XXXXX" and shall be maintained in a separate portion of the record under seal, segregated in the files of the Commission, and withheld from inspection by any person not bound by the terms of this Order.

C. The Protected Material subject to this Order shall be shielded from disclosure to the extent permitted by law. If any person files a request under the Freedom of Information Act ("FOIA") with the MPSC or the Michigan Attorney General seeking access to documents subject to this Protective Order, the MPSC's Executive Secretary, Staff, or the Attorney General shall promptly notify the Disclosing Party, and the Disclosing Party may take whatever legal actions it deems appropriate to protect the Protected Material from disclosure. In light of Section 5 of the Freedom of

Information Act, MCL 15.235, the notice must be given at least five (5) business days before the MPSC, Staff, and/or the Michigan Attorney General grant the request in full or in part.

IV. Termination of Protected Status

A. A Receiving Party reserves the right to challenge by motion whether a document or information is Protected Material and whether this information can be withheld under this Protective Order. The Receiving Party challenging the protected status of the document must explicitly state its reason for challenging the confidential designation. In response to a motion, the Commission or the presiding hearing officer in this case may revoke a document's protected status after notice and hearing. If the Commission or designated presiding hearing officer revokes a document's protected status, then the document loses its protected status after 14 days unless a Party files an application for leave to appeal the ruling and a request for a stay to the Commission pursuant to R 792.10433. If the application for leave is timely, the document's protected status will continue during the Commission appeal process. Any Party opposing the application for leave to appeal and the stay shall file an answer with the Commission no more than 14 days after the filing and service of the appeal. Continued protected status post order, will be determined by the Commission in its order addressing the application for leave and the request for stay. Nothing in this paragraph shall prohibit the Disclosing Party from seeking a stay on appeal of the Commission's decision regarding the revocation of any document's protected status.

B. The Disclosing Party bears the burden of proving that the document should continue to be protected from disclosure.

V. Retention of Documents

Protected Material remains the property of the Disclosing Party and, except as required by applicable law and State retention schedules, only remains available to the Receiving Party for the duration that this docket remains open, or until another earlier time as identified by the Commission. If the Disclosing Party seeks to have the Receiving Party return all Protected Material in the Receiving Party's possession or in the possession of its Reviewing Representatives, or certify in writing that all Protected Material has been destroyed, it is the responsibility of the Disclosing Party to contact the Receiving Party and make its request no earlier than the expiration of the time that this docket remains open, or until another earlier time as identified by the Commission. Further, for a Receiving Party that is associated with the State, the request must be consistent with the expiration of the State retention requirement. Notwithstanding the foregoing, counsel for the Receiving Party may maintain a single confidential file of Protected Material subject to all other provisions in this Order. Should counsel seek to refer to the Protected Material in another Commission proceeding, the Disclosing Party must be the utility filing the distribution investment and maintenance plan in said proceeding and counsel must ensure there is a protective order in said proceeding which protects the Protected Material from public disclosure.

VI. Limitations and Disclosures

This Protective Order does not apply to a particular document, or portion of a document, described in Paragraph II.A if a Receiving Party can demonstrate that it

has been previously disclosed by the Disclosing Party on a non-confidential basis or meets the criteria set forth in Paragraphs I.B.1 through I.B.4. A Receiving Party intending to disclose information taken directly from materials identified as Protected Material must, before actually disclosing the information, do one of the following: (i) contact the Disclosing Party's counsel of record and obtain written permission to disclose the information, or (ii) challenge the confidential nature of the Protected Material and obtain a ruling under Paragraph IV that the information is not confidential and may be disclosed in or on the public record.

VII. Remedies

If a Receiving Party violates this Protective Order by improperly disclosing or using Protected Material, the Receiving Party shall take all necessary steps to remedy the improper disclosure or use. This includes promptly notifying all Parties and the presiding hearing officer in writing. The written notice must identify the person known or reasonably suspected to have obtained the Protected Material. A Party or person that violates this Protective Order remains subject to this paragraph regardless of whether the Disclosing Party could have discovered the violation earlier than it was discovered. This paragraph applies to both inadvertent and intentional violations. Nothing in this Protective Order limits the Disclosing Party's rights and remedies, at law or in equity, against a Party or person using Protected Material in a manner not authorized by this Protective Order, including the right to obtain injunctive relief in a court of competent jurisdiction to prevent violations of this Protective Order.

VIII. Modification

Formal Addendums to this agreement may be established by the Commission or an ALJ, if designated by the Commission, upon motion by any party and after notice and hearing.

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

U-20147

NONDISCLOSURE CERTIFICATE

By signing this Nondisclosure Certificate, I acknowledge that access to Protected Material is provided to me under the terms and restrictions of the Protective Order issued in Case No. U-20147, that I have read the Protective Order, and that I agree to be bound by the terms of the Protective Order.

Reviewing Representative:

Date: _____

Receiving Party:

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

U-20147

NONDISCLOSURE CERTIFICATE
FOR CRITICAL ELECTRIC INFRASTRUCTURE INFORMATION

I hereby agree and certify my understanding that access to Critical Electric Infrastructure Information (“CEII”) as defined at 16 USC Section 824o-1(a)(3) and 18 CFR Section 388.113(c) is provided to me pursuant to the terms and restriction of this CEII Nondisclosure Certificate and the Protective Order issued in Case No. U-20147, that I have been given a copy of and have read the Protective Order, and I agree to be bound by the terms of this CEII Nondisclosure Certificate and the Protective Order. I further agree that:

1. I will use CEII only for the purpose for which it was requested;
2. I will only discuss CEII with a Party and/or Reviewing Representative;
3. I will keep CEII in a secure place in a manner that prevents unauthorized access;
4. I will destroy CEII or return it to the disclosing party upon request;

5. I understand that CEII is not subject to release under the Freedom of Information Act;

6. I understand that I am obligated to protect CEII even after a designation as CEII has lapsed until a determination by the administrative law judge that the information should no longer be designated as CEII; and

7. I will report all unauthorized disclosures of CEII to the Disclosing Party.

Date: _____	Reviewing Representative: _____
	Title: _____
	Receiving Party: _____
	Printed Name: _____

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 their five-year distribution investment)
and maintenance plans and for other related,)
uncontested matters.)
_____)

Case No. U-20147

PROOF OF SERVICE

STATE OF MICHIGAN)
) SS
COUNTY OF JACKSON)

Melissa K. Harris, being first duly sworn, deposes and says that she is employed in the Legal Department of Consumers Energy Company; that on October 24, 2024, she served an electronic copy of **Consumers Energy Company’s Comments on Case No. U-20147 Straw Proposal** upon the persons listed in Attachment 1 hereto, at the e-mail addresses listed therein.



Melissa K. Harris

Subscribed and sworn to before me this 24th day of October, 2024.



Crystal L. Chacon, Notary Public
State of Michigan, County of Eaton
My Commission Expires: 05/25/30
Acting in the County of Jackson

ATTACHMENT 1 TO CASE NO. U-20147

Party	Mailing Address	Email Address
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Counsel for the Michigan Cable Telecommunications Association (“MCTA”)		
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ATTACHMENT 1 TO CASE NO. U-20147

Counsel for the Michigan Environmental Council, Citizens Utility Board of Michigan, Natural Resources Defense Council, and Sierra Club (“MNSC”)		
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