

December 30, 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-21490 – In the matter of the application of Consumers Energy Company for authority to increase its rates for the distribution of natural gas and for other relief.

Dear Ms. Felice:

Enclosed for electronic filing in the above-captioned case, please find **Consumers Energy Company's Gas Enhanced Infrastructure Replacement Program 2025 Planning Report**. This is a paperless filing and is therefore being filed only in PDF format. I have also included a Proof of Service showing electronic service upon the parties.

Sincerely,

Anne M. Uitvlugt
Phone: 517-788-2112
Email: anne.uitvlugt@cmsenergy.com

cc: Parties per Attachment 1 to Proof of Service

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of)
CONSUMERS ENERGY COMPANY)
for authority to increase its rates for the)
distribution of natural gas and for other relief.)
_____)

Case No. U-21490

CONSUMERS ENERGY COMPANY’S
GAS ENHANCED INFRASTRUCTURE REPLACEMENT PROGRAM
2025 PLANNING REPORT

BACKGROUND

The Gas Enhanced Infrastructure Replacement Program (“EIRP”) [formerly called Main Replacement Program (“MRP”)] was put in place to accelerate the removal of higher-risk pipe from the transmission and distribution system and increase the ability to perform in-line pipeline integrity inspection on the transmission system through the addition of launchers and receivers and the elimination of un-piggable sections.

The EIRP was originally approved by the Michigan Public Service Commission (“MPSC” or the “Commission”) in Case No. U-16855. See MPSC Case No. U-16855, Order Approving Settlement Agreement, June 7, 2012. In that docket, Consumers Energy Company (“Consumers Energy” or the “Company”) agreed to fund a MRP in the amount of \$56 million. Subsequently, in Case No. U-17643, the parties entered into a Settlement Agreement that amended the EIRP with the following terms:

Consumers Energy agrees that it will fund an Enhanced Infrastructure Replacement Program (“EIRP”). The EIRP is a twenty-five year incremental investment program intended to upgrade natural gas infrastructure, which includes approximately 540 miles of cast iron pipe. The EIRP is based on transmission and distribution integrity management principles intended to eliminate cast iron pipe and other high-risk components as identified through

existing Federal and State code requirements. EIRP is currently projected at \$75 million per year. The EIRP will conform to the requirements set forth in Attachment 3 to this Settlement Agreement. An illustration of the methodology for calculating of the EIRP refund amount, if any, is included as Attachment 4 to this Settlement Agreement.

These terms have been continued and modified pursuant to Settlement Agreements and Commission Orders in Case No. U-17882, Case No. U-18124, Case No. U-18424, Case No. U-20322, Case No. U-20650, Case No. U-21148, Case No. U-21308, and Case No. U-21490. As part of the Settlement Agreement in Case No. U-21490, the parties agreed that the EIRP will continue with the increased spending amount of \$215.3 million for the 12 months ending September 30, 2025.

As set forth in Attachment 3 to the Settlement Agreement approved in the January 13, 2015 Order in Case No. U-17643, the following requirements are specified for the EIRP:

Requirements for the EIRP Program:

- 1) A reconciliation report shall be compiled and filed by Consumers Energy in this docket to determine if \$75 million was spent on the EIRP for the calendar years 2015. The report is to be filed in this docket by April 30, 2016 to determine if any refund is necessary. Annual EIRP reporting will continue in 2017 and beyond, on or before April 30 of each year, without refund obligation until modified by Commission order. The detailed report, as further described in this attachment, will include performance metrics. Parties will have 30 days to file objection to the report filed. For calendar year 2015 only, Consumers Energy agrees to refund an amount equal to the return of and on any shortfall in actual average EIRP rate base measured against the average EIRP rate base determined using \$75 million in spending. The amount, if any, of such refund shall be calculated in the manner set forth in Attachment 4 to this Settlement Agreement. Consumers Energy will process the EIRP refund in conjunction with that year's Gas Cost Recovery

reconciliation proceeding on an equal percentage rate design as agreed to in this docket.¹

- 2) With regards to the transmission and distribution pipe replaced or retired the report will contain the following: (i) a project number for each job; (ii) the headquarters assigned the project; (iii) the project location, (iv) the type of pipe replaced, (v) the length of pipe replaced, (vi) whether Consumers' workers or contractors performed the work, (vii) and the final cost of each project.
- 3) No transmission launchers and receivers shall be included in the allowable cost as part of the EIRP.
- 4) The location and number of service lines renewed or retired and the cost of each project will be included in the EIRP report.
- 5) The EIRP report will include the number of known leaks remediated from replaced infrastructure with an estimated annual O&M savings for leak survey and leak repair.
- 6) The \$75 million of incremental funding will only be utilized for the EIRP. No amount of the EIRP funding shall be used to for new business, asset relocation, routine unplanned main renewal work, regulatory compliance, capacity/deliverability, gas operations, gas storage wells, or gas business services.
- 7) The EIRP is primarily for replacement of distribution high risk pipe and Consumers will provide detailed explanation regarding the uses of such funds for transmission pipeline.
- 8) All of the dollars spent on the EIRP will be tracked via Main Replacement Program work orders, in a matter that is conducive to audit.
- 9) The \$75 million Enhanced Infrastructure Replacement Program funding will remain in effect until a new rate case order.

In addition to the EIRP Performance Report to be filed annually by April 30, Consumers Energy has agreed to file an EIRP Planning Report. The EIRP Planning Report requires the following:

New EIRP Planning Report Requirements

1. Filed by December 31 of Preceding Year

¹ The Commission has approved an increased spending level for the EIRP Program as noted above.

2. Proposed Projects Including all Data Points (Existing and New) in Performance Report
3. Highest Risk Ranked Projects with a Total Footage Equal to #2 Above in a Format Similar to the Performance Report
4. Excel files of tables and charts included in plan to be provided to Staff after plan filing.

The attached report complies with the EIRP Planning Report requirements. The report contains the 2025 planned EIRP projects, including all data points. Further, the EIRP Planning Report delineates the Transmission Operated by Distribution (“TOD”) and non-TOD projects as was agreed to in Case No. U-20322. The report also contains the highest risk ranked projects. Upon the filing of the EIRP Planning Report, Consumers Energy will provide the MPSC Staff with the excel files of tables and charts included in the report.

Respectfully submitted,

Dated: December 30, 2024

CONSUMERS ENERGY COMPANY

2025 Gas Enhanced Infrastructure Replacement (EIRP) - Annual Planning Report ¹

Capital Expenditure Summary	Estimated Total 2025 Costs	Planned Footage	Est. Leaks
Est. Distribution Main Replacement	\$242,018,590	736,578	9
Est. 2024 Carryover Costs	\$1,500,000		
Est. Future Year Survery, Material, Preparatory Costs	\$3,500,000		
Est. Distribution Subtotal	\$247,018,590	736,578	9
Est. Transmission and Storage Pre-1970 LFERW Pipe Rpl	\$0	0	0
Est. 2024 Carryover Costs	\$0		
Est. Future Year Survery, Material, Preparatory Costs	\$0		
Est. Transmission and Storage Subtotal	\$0	0	0
Total Est. EIRP Capital Expenditure	\$247,018,590	736,578	9

O&M Expenditure Summary	Estimated Total 2025 Costs
Total EIRP O&M Expenditure	\$3,368,000

Grand Total EIRP Program Expenditures	\$250,386,590
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Notes:

¹ This report has been prepared using estimated figures. Actual results will vary.

2025 Gas Enhanced Infrastructure Replacement (EIRP) - Annual Planning Report¹

Distribution Main Replacements				Estimated Main to be Retired (Ft)										Estimated Main Installed (Ft)			Estimated Services			Est. Leaks Remediated	Construction Crew	Risk Rank / Selection Reason	
Parent Project Number (PPN)	DAPP Project ID	Project WBS	Headquarters	Project Location	Project Name	Total Est Cost 3	Cast Iron	Coated & Wrapped	Bare Steel	Threaded & Coupled	Wrought Iron	Xtrube	Copper	Plastic	Total	Code 3 (Ft)	Code 3 (Miles)(Already factored in Bare Steel & C/W) (2)	Plastic Total	Steel Total				Total
PPN4075NEALM		GL-03544	Midland	Alma	ALM2 (4.6,7)	\$10,130,802	0	0	5,212	27,428	2,856	0	0	0	35,496	500	0.09	38,700	0	38,700	229	187	TBD
PPN4105NEFLT		GL-03490	Flint	Flint	FLT6 (Ph. 2)	\$995,175	0	144	178	1,961	0	0	0	21	2,304	0	0.00	3,271	0	3,271	7	9	TBD
PPN4108NESAG		GL-03564	Saginaw	Saginaw	SAG9 (Ph. 2)	\$471,200	0	0	0	0	0	0	0	0	0	0	0.00	1,800	0	1,800	15	15	TBD
PPN4063SEMAG		GL-03452	Macomb	Macomb	MAC12 (Ph. 1-8)	\$28,812,419	0	37,228	16,426	65,006	0	0	0	2,308	120,968	10,376	1.97	111,406	0	111,406	3,146	337	TBD
PPN4042SWKAL		GL-03572	Lansing/ Jackson	Kalamazoo	KAL2 (Ph. 1,2,4,5,10)	\$13,543,801	42,546	4,385	2,485	0	114	0	0	2,167	51,697	0	0.00	47,930	2,345	50,275	1,001	433	TBD
EIRP Grid Projects Subtotal						\$53,953,397	42,546	41,757	24,301	94,395	2,970	0	0	4,496	210,465	10,876	2.06	203,107	2,345	205,452	4,398	981	3

PPN4090SEHWL		GL-03560	Flint	Howell	HWL2 (Ph. 1,4,5)	\$4,746,402	0	1,766	5,755	0	0	0	0	10	7,531	0	0.00	0	6,595	6,595	3	3	TBD
PPN4067NEFLT		GL-03485	Flint	Flint	FLT5 (Ph. 1-3)	\$11,540,738	0	23,020	18,225	4,058	0	0	0	1,098	46,401	0	0.00	44,086	0	44,086	106	240	TBD
PPN4105NEFLT		GL-03548	Flint	Flint	FLT6 (Ph. 1) Line 1045	\$3,403,447	0	0	5,984	0	0	0	0	0	5,984	0	0.00	0	4,729	4,729	0	0	TBD
PPN4117SWOWS		GL-03562	Flint	Owosso	OWS1	\$5,793,561	0	280	7,700	0	0	0	0	0	7,980	0	0.00	0	8,050	8,050	46	11	TBD
PPN4111NEALM		GL-03494	Midland	Alma	ALM5 (Ph. 1) Line 1070G	\$10,108,480	0	0	14,681	0	0	0	0	0	14,681	0	0.00	125	14,000	14,125	2	0	TBD
PPN4122NESAG	20193	GL-03408	Saginaw	Saginaw	SAG6 TOD Line 1087G (TOD)	\$25,189,394	0	647	24,799	0	0	0	0	0	25,446	250	0.05	0	35,000	35,000	0	13	TBD
PPN4109NESAG		GL-03543	Saginaw	Saginaw	SAG8 (Junction)	\$9,859,848	0	360	22,113	0	0	0	0	6	22,479	0	0.00	0	13,700	13,700	37	38	TBD
PPN4108NESAG		GL-03493	Saginaw	Saginaw	SAG9 (Shields HP)	\$1,739,508	0	0	2,474	0	0	0	0	0	2,474	0	0.00	0	2,410	2,410	0	0	TBD
PPN4106SELIV	22036	GL-03491	Livonia	Livonia	LIV6 (Ph. 1) Line 1019W (TOD)	\$4,352,931	0	5,050	0	0	0	0	0	0	5,050	0	0.00	2,778	5,050	7,828	23	0	TBD
PPN4100SWKAL		GL-03481	Lansing/ Jackson	Kalamazoo	KAL6 (W. Main & W. Michigan)	\$7,192,652	0	362	6,569	0	0	0	0	0	6,931	0	0.00	0	9,994	9,994	1	0	TBD
PPN4114SWLAN		GL-03539	Lansing/ Jackson	Lansing	LAN8 (Lk. Lansing/Larch)	\$4,203,030	0	1,227	4,736	0	0	0	0	0	5,963	0	0.00	0	5,840	5,840	2	2	TBD
PPN4113SWLAN		GL-03540	Lansing/ Jackson	Lansing	LAN9 (Lk. Lansing Rd)	\$4,174,242	0	164	5,725	0	0	0	0	0	5,889	0	0.00	0	5,800	5,800	41	12	TBD
EIRP TOD & Steel Projects Subtotal						\$92,304,232	0	32,876	118,761	4,058	0	0	1,114	156,809	250	0.05	46,989	111,168	158,157	261	319	1	

PPN4125SWOWS		GL-03563	Flint	Owosso	OWS2 (Ph. 1,2)	\$6,099,424	0	7,382	1,239	11,985	0	0	0	1,287	21,893	11,841	2.24	23,300	0	23,300	368	71	TBD
PPN4044NEBCY		GL-03484	Saginaw	Bay City	BCY2 (Ph. 3,7,8)	\$8,112,495	20,277	9,054	805	1,088	0	0	0	2,815	34,039	0	0.00	30,990	0	30,990	341	260	TBD
PPN4107NEBCY		GL-03547	Midland	Bay City	BCY3 (Ph. 1)	\$261,778	0	56	3,333	0	0	0	0	2	3,391	0	0.00	1,000	0	1,000	5	4	TBD
PPN4110NEALM		GL-03545	Midland	Alma	ALM4 (Ph. 1)	\$1,282,711	0	2,085	3,909	0	0	0	0	346	6,340	0	0.00	4,900	0	4,900	26	30	TBD
PPN4077NEMDL		GL-03561	Midland	Midland	MDL2 (Ph. 1)	\$3,452,850	0	13,180	0	0	0	0	0	0	13,180	6,225	1.18	13,190	0	13,190	14	61	TBD
PPN4094NESAG		GL-03565	Saginaw	Saginaw	SAG11 (Ph. 1,2)	\$2,976,938	3,758	2,489	2,090	0	0	0	0	0	8,337	0	0.00	11,372	0	11,372	31	47	TBD
PPN4127NESAG		GL-03486	Saginaw	Saginaw	SAG12 (Ph. 2)	\$1,382,187	18,349	1,629	0	0	0	0	0	135	20,113	0	0.00	5,280	0	5,280	0	0	TBD
PPN4095SEMAG		GL-03492	Macomb	Macomb	MAC14 (Ph. 2)	\$5,136,300	0	2,096	0	14,837	0	0	0	320	17,253	4,730	0.90	19,860	0	19,860	375	0	TBD
PPN4012SELIV		GL-03203	Livonia	Livonia	LIV3 (Ph. 5)	\$4,557,755	0	3,054	0	14,569	0	0	0	0	17,623	0	0.00	17,623	0	17,623	356	42	TBD
PPN4050SELIV		GL-03566	Livonia	Livonia	LIV4 (Ph. 1-5,7)	\$18,609,648	0	739	4,701	66,200	0	0	0	1,209	72,849	4,054	0.77	71,956	0	71,956	744	233	TBD
PPN4032SEROK		GL-03005	Royal Oak	Royal Oak	ROK4 (2,3,5,6)	\$7,391,772	0	26,989	7,735	5,364	0	0	0	443	40,531	0	0.00	28,581	0	28,581	274	265	TBD
PPN4036SEROK		GL-03204	Royal Oak	Royal Oak	ROK6 (Ph. 5)	\$4,593,963	0	17,595	0	160	0	0	0	85	17,840	0	0.00	17,763	0	17,763	443	91	TBD
PPN4071SEROK		GL-03487	Royal Oak	Royal Oak	ROK13 (Ph. 1)	\$5,619,671	19,834	1,305	3,631	0	0	0	0	3,179	27,949	0	0.00	21,729	0	21,729	892	0	TBD
PPN4068SEROK		GL-03567	Royal Oak	Royal Oak	ROK14	\$2,274,093	9,266	854	0	0	0	0	0	356	10,476	0	0.00	8,793	0	8,793	194	29	TBD
PPN4097SEROK		GL-03568	Royal Oak	Royal Oak	ROK15 (Ph. 1-4)	\$1,711,583	0	3,158	3,535	378	0	0	0	39	7,110	3,735	0.71	6,618	0	6,618	227	0	TBD
PPN4098SEROK		GL-03569	Royal Oak	Royal Oak	ROK16 (Ph. 1)	\$292,247	0	318	1,108	0	0	0	0	61	1,487	0	0.00	1,130	0	1,130	24	0	TBD
PPN4099SEROK		GL-03570	Royal Oak	Royal Oak	ROK17 (Ph. 1)	\$129,313	0	0	441	0	0	0	0	82	523	0	0.00	500	0	500	8	3	TBD
PPN4104SWJAC		GL-03571	Lansing/ Jackson	Tecumseh	JAC1 (Tecumseh)	\$687,487	0	94	2,453	38	0	0	0	74	2,659	0	0.00	2,375	0	2,375	6	2	TBD
PPN4009SWLAN		GL-03201	Lansing/ Jackson	Lansing	LAN4 (Ph. 4-8)	\$20,557,108	0	34,002	10,319	23,416	0	0	0	1,586	69,323	7,863	1.49	83,105	0	83,105	494	328	TBD
PPN4017SWLAN		GL-03455	Lansing/ Jackson	Lansing	LAN5 (Ph. 11)	\$327,448	0	412	0	0	0	0	0	0	412	155	0.03	1,270	0	1,270	0	0	TBD
PPN4102SWLAN		GL-03575	Lansing/ Jackson	Lansing	LAN7 (Eaton&Mason)	\$404,191	0	1,655	270	0	0	0	0	166	2,091	1,294	0.25	1,634	0	1,634	8	3	TBD
EIRP Segment Projects Subtotal						\$95,760,960	71,484	128,146	45,569	138,035	0	0	0	12,185	395,419	39,897	7.56	372,969	0	372,969	4,830	1,469	5

EIRP Program Projects Total						\$242,018,590	114,030	202,779	188,631	236,488	2,970	0	0	17,795	762,693	61,023	9.66	623,065	113,513	736,578	9,489	2,769	9
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2024 Project Carryover Cost						
Estimated 2024 Projects Carryover Restoration:						
PPN4032SEROK		GL-03005	Royal Oak	Royal Oak	ROK4	\$ 1,110,000
PPN4009SWLAN		GL-03201	Lansing/ Jackson	Lansing	LAN4	\$ 390,000
Estimated Other 2024 Carryover Costs:						
					Total	\$1,500,000

Est. Future Year Survey/Engineering		Est. Survey, Material, Preparatory Costs	\$3,500,000
		Estimated EIRP Distribution Total	\$247,018,590

Notes:
 1 This report has been prepared using estimated figures. Actual results will vary.
 2 Code 3 is an identification for a category of pipe and not an actual type of pipe. Code 3 pipe footage is included within the following pipe types: Coated & Wrapped, Bare Steel, Threaded & Coupled and Wrought Iron
 3 Cost do not include COR.
 4 The estimated total 2025 service count is included in renewals and tie overs, however some retirements may occur based on identification of abandoned homes as construction of the projects proceed in the field

2025 Gas Enhanced Infrastructure Replacement (EIRP) - Annual Planning Report ^{1,2}

Transmission & Storage Projects (T&S)

Pre-1970 LFERW Pipe Replacements

Project WBS	Headquarters	Project Location	Project Name	Total Est Cost	Type of Pipe Replaced	Length of Pipe Replaced	Construction Crew	Leaks
			No EIRP T&S Projects in 2025	\$0		0		0
			Subtotal	\$0		0		

2024 Carryover Cost

Est 2024 Project Carryover Cost	\$0
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Est. Future Year Survey/Engineering

Est. Survey, Material, Preparatory Costs	\$0
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Total	\$0
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Notes:

- 1 No T&S projects are planned in the EIRP program for 2025.
- 2 Per the direct testimony of Timothy K. Joyce in MPSC Case No. U-20650: Beginning in 2020, the Company consolidated the EIRP storage lateral replacements into the Storage Pipeline Replacement Program. All well line piping will be tracked under the Transmission Integrity Management Program ("TIMP"), following 49 CFR 192 Subpart O, for risks and consequences of failures.

2025 Gas Enhanced Infrastructure Replacement (EIRP) - Annual Planning Report¹

Estimated Staffing and Overall % of Time

	Est. Number of Staff	EIRP	Vintage Services	Asset Relocation (CIVIC)	Compliance Based Distribution	Pipe Integrity (PI)	Non-modeled (CINC)	Total
Field Technicians:								
Construction	379	100%	0%	0%	0%	0%	0%	100%
Field Leaders	50	100%	0%	0%	0%	0%	0%	100%
Sr Field Leaders	12	100%	0%	0%	0%	0%	0%	100%
Support Staff:								
Managers ²	5	100%	0%	0%	0%	0%	0%	100%
Administrative Support ²	19	100%	0%	0%	0%	0%	0%	100%
Schedulers ²	4	100%	0%	0%	0%	0%	0%	100%
Technical Analyst ²	1	100%	0%	0%	0%	0%	0%	100%
Technical Specialist ²	1	100%	0%	0%	0%	0%	0%	100%
Planner ²	1	100%	0%	0%	0%	0%	0%	100%
Program Manager ²	1	100%	0%	0%	0%	0%	0%	100%
Project Managers ²	0	100%	0%	0%	0%	0%	0%	100%
Program Cost Analyst ²	1	100%	0%	0%	0%	0%	0%	100%

Notes:

- 1 This report has been prepared using estimated figures. Actual results will vary.
- 2 These positions are full time employees. The majority of the staff that supports the EIRP Program is the gas construction seasonal workforce.

2025 Gas Enhanced Infrastructure Replacement (EIRP) - Annual Planning Report ¹

Estimated Annual O&M AND LAUF Savings

	Est. Annual O&M Savings
Leak Survey:	\$1,300
Main	\$100
Services	\$1,200
Leak Repair: ²	\$28,000
Main	\$7,000
Services	\$21,000
Cathodic Protection ³	\$17,000
Total	\$46,300

Lost & Unaccounted for Gas (LAUF) ^{4, 5}	\$8,000
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Notes:

- 1 This report has been prepared using estimated figures. Actual results will vary.
- 2 Leak repair O&M savings is a one time savings from replacement of existing pipe and not recurring.
- 3 Cathodic protections savings will vary based on the projects completed in a given year.
- 4 Gas pipe leak rate estimated based on EPA's Gas STAR Program emission factors for leak rate conversion.
- 5 Estimate based on a gas cost of \$3.176 per Mcf.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of)
CONSUMERS ENERGY COMPANY)
for authority to increase its rates for the)
distribution of natural gas and for other relief.)
_____)

Case No. U-21490

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 December 30, 2024 she served an electronic copy of **Consumers Energy Company's Gas Enhanced Infrastructure Replacement Program 2025 Planning Report** 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 30th day of December, 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-21490

Party	Mailing Address	Email Address
Administrative Law Judge		
Christopher S. Saunders	Public Service Division 7109 West Saginaw Highway Post Office Box 30221 Lansing, MI 48909	saundersc4@michigan.gov
Counsel for Consumers Energy Company		
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Counsel for the Michigan Public Service Commission Staff		
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Counsel for Attorney General Dana Nessel		
*Celeste R. Gill, Esq.	Michigan Department of Attorney General, Special Litigation Division 525 West Ottawa Street 6th Floor Williams Building Post Office Box 30755 Lansing, MI 48909	gillc1@michigan.gov AG-ENRA-Spec-Lit@michigan.gov
Consultant for Attorney General Dana Nessel		
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ATTACHMENT 1 TO CASE NO. U-21490

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