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August 12, 2025

VIA ELECTRONIC CASE FILING

Executive Secretary
Michigan Public Service Commission
7109 W. Saginaw Highway
Lansing, Michigan 48917

Re: Case No. U-21859 – In the Matter of the Application of Consumers Energy Company for Ex Parte Approval of Certain Amendments to Rate GPD.

Dear Executive Secretary:

Enclosed for filing please find the ***Association of Businesses Advocating Tariff Equity's Official Exhibits [AB-1 and AB-2]*** and ***Proof of Service*** in the above-referenced matter.

Sincerely,

CLARK HILL PLC

Stephen A. Campbell

Digitally signed by: Stephen A. Campbell
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Date: 2025.08.12 11:02:24 -04'00'

Stephen A. Campbell

SAC/nb
Enclosures

cc: Parties of Record

Question:

DCC-5. Please provide a description of the transmission infrastructure investment required to accommodate a 15 GW increase in the Company's electric peak load. a. If the Company has evaluated the transmission infrastructure investment necessary to accommodate a different level of peak load increase, identify the specific load increase evaluated and provide a description of the transmission infrastructure investment the Company believes would be required to serve that level of peak load increase.

Response:

Objection of Counsel: Consumers Energy Company objects to this discovery request on the grounds that said request is not relevant to a determination of reasonable modification of the Company's Rate GPD tariff to allow for certain customer protections. Subject to this objection, and without waiving it, Consumers Energy responds as follows:

The Company does not design or construct transmission infrastructure. Furthermore, the Company has not requested the local Transmission Owner to conduct a study to identify the transmission infrastructure investment required to accommodate a 15 GW increase in the Company's electric peak load. The Company provides its firm load forecast to MISO for the 10-year horizon, enabling the Transmission Planner to identify necessary transmission investments.

a. When a customer requests a significant large load addition, the Company engages with the Transmission Owner and requests a System Impact Study of the transmission system. The Company has engaged with the Transmission Owner for 2.65 GW of large load additions, which the Transmission Owner estimated would necessitate a transmission infrastructure investment of $730-$780 million to support the load interconnections. This estimate does not include additional transmission infrastructure required to interconnect additional generation to support the load.

   As evidenced in MISO's DPP studies with increasing queue sizes, the Company anticipates that transmission investment will be exponential, rather than linear, when considering an increase from the studied 2.65 GW load additions to the requested 15 GW increase.

Witness: Laura M. Connolly
Date: April 16, 2025

Question:

DCC-7. Please provide a description of the generation investment the Company believes would be required to serve approximately 15 GW of new peak load.

a. If the Company has evaluated the generation investment necessary to accommodate a different level of peak load increase, identify the specific load increase evaluated and provide a description of the generation investment the Company believes would be required to serve that level of peak load increase.

Response:

The Company has not evaluated generation investment required for 15 GW of additional peak load.

a. The Company has considered load growth scenarios and required generation supply for up to approximately 2 GW of new peak load. Generation investment requirements have not been identified for the load growth, in isolation. Instead, the Company adds load growth scenarios to existing or projected peak load requirements for the entirety of its service territory. Determination of generation investment required for projected peak load is done within the integrated resource plan process. Incremental generation investment would be identified in the Company's next IRP.

Witness: Laura M. Connolly
Date: April 16, 2025

Question:

18. Please identify each type of cost associated with interconnecting a new large load customer of 100 MW or larger. For each type of cost, please identify whether it is directly assigned to the prospective customer load.

Response:

Cost associated with interconnecting a new large load customer of 100 MW or greater includes Transmission and Distribution costs.

Transmission costs could include, but are not limited to, new transmission lines built between the existing transmission facilities and the location of the new load, new transmission switching station(s) at the site of the load or elsewhere, transmission network upgrades such as reconductoring of transmission lines, substation equipment replacement, system protection relaying upgrades, line or substation facilities to increase transmission capacity for the new load addition, and/or line routing and easement acquisition. The transmission costs listed are for interconnection costs of load and do not include additional transmission costs to interconnect new energy resources to serve the load.

Distribution costs could include, but are not limited to, new distribution lines built between existing or new transmission facilities and the new dedicated customer substation, distribution switching station(s), dedicated customer substation(s), line routing and easement acquisition, and/or power factor correction equipment depending on the customer's power factor.

Supply resource costs are not included in these types of costs, as those are associated with serving new load not interconnection costs. Feasibility studies, customer meetings, contract negotiations, etc. are not considered in this response because they could be incurred with or without interconnecting new load.

The Company does not currently direct assign costs to specific customers but rather allocates costs in accordance with the requirements set forth in 2008 PA 286.

Witness: Laura M. Connolly
Date: April 30, 2025

Question:

21859-DCC-CE-0013. Please refer to Connolly Direct at 4:7-8. "The Company has data center inquiries that total over 15 gigawatts of electric load in the economic development pipeline." Please provide a spreadsheet or other document listing each of the referenced "data center inquiries," and identify, for each inquiry: a) the proposed location; b) the associated electric load and/or contract capacity; and c) the timeline for energization and delivery of requested capacity, including any proposed load ramp.

Response:

See attached

Witness: Laura M. Connolly
Date: May 13, 2025

Id	Location	Load (MW)	Requested in-service year	50% of peak year	Peak demand reached year	Date of Inquiry	Description
A	East Central Region	400	As soon as possible	Unknown	Unknown	10/7/2024	Data Center
B	South Central Region	1,000	Q1 2026	Q2 2033	Q1 2040	10/4/2024	Data Center
C	Unknown	300	Unknown	Unknown	Unknown	11/6/2024	Data Center
D	East Central Region	300	As soon as possible	Unknown	Unknown	7/15/2024	Data Center
E	Unknown	200	As soon as possible	Unknown	Within 36 months	5/7/2024	Data Center
F	Southwest Region	Unknown	Unknown	Unknown	Unknown	12/3/2024	Data Center
G	Unknown	200	Unknown	Unknown	Unknown	11/19/2024	Data Center
H	Unknown	250	As soon as possible	Unknown	Unknown	3/10/2025	Data Center
I	East Central Region	1,000	As soon as possible	Unknown	Within 36 months	2/26/2025	Data Center
J	West Region	300	Q1 2029	Q4 2030	Q4 2033	3/1/2024	Data Center
K	Unknown	300	Q4 2029	Q2 2030	Q4 2033	6/6/2024	Data Center
L	East Region	100	Unknown	Unknown	Unknown	1/9/2025	Data Center
M	Unknown	300	Unknown	Unknown	Q1 2030	12/4/2024	Data Center
N	East Region	700	Unknown	Unknown	Unknown	2/4/2025	Data Center
O	Unknown	1,000	Within 2-3 years	Unknown	Within 5-10 years	2/28/2025	Data Center
P	East Central Region	300	Unknown	Unknown	Unknown	3/10/2025	Data Center
Q	Unknown	Unknown	Unknown	Unknown	Unknown	7/29/2024	Data Center
R	Unknown	500	Unknown	Unknown	Unknown	8/7/2024	Data Center
S	South Central Region	100	Unknown	Unknown	Unknown	10/4/2024	Data Center
T	Unknown	Unknown	Q1 2027	Unknown	Q1 2031	10/31/2024	Data Center
U	Southwest Region	50	Unknown	Unknown	Unknown	12/19/2024	Data Center
V	Unknown	1,200	Q1 2028	Q2 2029	Q4 2030	10/16/2024	Data Center
W	Unknown	300	Unknown	Unknown	Unknown	8/19/2024	Data Center

Id	Location	Load (MW)	Requested in-service year	50% of peak year	Peak demand reached year	Date of Inquiry	Description
X	Southwest Region	4	2024	2024	2024	7/25/2024	Data Center
Y	Unknown	300	Unknown	Unknown	Unknown	1/15/2025	Data Center
Z	Unknown	Unknown	Unknown	Unknown	Unknown	10/31/2024	Data Center
AA	Unknown	500	Unknown	Unknown	Unknown	9/10/2024	Data Center
AB	Unknown	1,000	Q1 2029	Unknown	Unknown	10/31/2024	Data Center
AC	Unknown	500	Q1 2026	Unknown	Q1 2029	7/12/2024	Data Center
AD	Unknown	Unknown	Unknown	Unknown	Unknown	10/29/2024	Data Center
AE	Unknown	500	Q3 2026	Q3 2027	Q3 2029	7/25/2024	Data Center
AF	Unknown	500	Unknown	Unknown	Unknown	10/10/2024	Data Center
AG	Unknown	600	Q4 2027	Unknown	2030	12/11/2024	Data Center
AH	Unknown	145	Unknown	Unknown	Unknown	7/31/2024	Data Center
AI	Unknown	1,000	2027	Unknown	Unknown	2/4/2025	Data Center
AJ	Southeasterly Region	500	Unknown	Unknown	Q1 2029	1/6/2025	Data Center
AK	Unknown	900	Q4 2027	Q4 2028	Q4 2029	9/11/2024	Data Center
AL	East Central	Unknown	Unknown	Unknown	Unknown	11/21/2024	Data Center

Question:

13. Please refer to the response to U21859-MNSC-CE-0034.

a. Please identify the specific portion(s) of 2008 PA 286 to which the Company is referring in the Company's statement that it "allocates costs in accordance with the requirements set forth in 2008 PA 286."

b. Are the referenced requirements for allocating new load interconnection costs under 2008 PA 286 implemented in specific tariffs or cost of service methodologies? If so, please identify and produce those tariffs and cost of service methodologies.

c. Explain how the Company's Contribution In Aid of Construction policy interacts with the referenced requirements for allocating new load interconnection costs.

d. The response to U21859-MNSC-CE-0034 lists dedicated customer substation(s) as a potential distribution cost associated with interconnecting a new large load customer of 100 MW or greater. Define "dedicated." Explain why the Company would not directly assign the cost of "dedicated" customer infrastructure to that customer.

Response:

a. The response incorrectly referenced 2008 PA 286 when the reference should have been MCL 460.11(1). MCL 460.11(1) states that "the commission shall ensure the establishment of electric rates equal to the cost of providing service to each customer class." The Company files and has its COSS reviewed for adherence of this standard and approved by the Commission.

b. The requirements apply to the COSS in its entirety. For a copy of the Company's most recently approved COSS, please see the Company's response to U-21859-DCC-CE-0009.

c. The Company's CIAC policy is outlined in its approved tariff on Sheets 3.0 -4.0. The Company may collect from customers the cost of distribution facilities via a refundable contribution (Customer Advance) or non-refundable contribution (CIAC). CIAC is removed from the plant balance that gets included in the Company's COSS and Customer Advances, which are treated as a deduction to rate base, are currently allocated based on distribution plant in service.

d. Dedicated refers to a substation put in place to serve one customer. See the Company's response to subpart c for an explanation of how the Company recovers those costs from that customer.

Witness: Laura M. Connolly
Date: May 30, 2025

Question:

21859-DCC-CE-0031.

Which MIS0 rate schedules recover the cost of incremental transmission infrastructure built to serve Consumers' retail customers?

Response:

MISO Rate Schedules 9 and 26 are the main two schedules responsible for a majority of the incremental costs for Michigan retail customers.

Witness: Laura M. Connolly
Date: May 30, 2025

Analysis of MW Size of Consumers' Large Data Center Load Addition Inquiries

	<100 MW	< 150 MW	< 200 MW	< 250 MW	< 300 MW	< 350 MW	< 400 MW	< 1,000 MW	<= 1,200 MW	Uknown MW
Total # of Load Inquiries	2	5	5	7	8	16	16	26	32	6
Total Amount of MW	54	399	399	799	1,049	3,449	3,449	9,049	15,249	
% of 15,249 MW	0.35%	2.62%	2.62%	5.24%	6.88%	22.62%	22.62%	59.34%	100.00%	
% of 15,249 MW above	99.65%	97.38%	97.38%	94.76%	93.12%	77.38%	77.38%	40.66%	0.00%	

Source: Attachment to Consumers' Response to Data Request U21859-DCC-CE-0045 (Exhibit AB-1 at 4-6)

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

*** * * * ***

In the matter of the application of **CONSUMERS ENERGY COMPANY** for Ex Parte Approval of Certain Amendments to Rate GPD.	)))))	Case No. U-21859 Hon. Katherine E. Talbot

PROOF OF SERVICE

STATE OF MICHIGAN)
) ss
COUNTY OF WAYNE)

Stephen A. Campbell, being first duly sworn, deposes and says that on August 12, 2025, he did cause to be served the ***Association of Businesses Advocating Tariff Equity's Official Exhibits [AB-1 and AB-2]***, as well as this ***Proof of Service***, in the above docket, via electronic mail, to the persons identified on the attached service list.

Stephen A. Campbell

Digitally signed by: Stephen A. Campbell
DN: CN = Stephen A. Campbell email = scampbell@clarkhill.com C = US O = Clark Hill PLC
Date: 2025.08.12 11:02:42 -04'00'

Stephen A. Campbell

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