

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter of the application of)
CONSUMERS ENERGY COMPANY)
for authority to increase its rates for) Case No. U-21870
the generation and distribution of)
electricity and for other relief.)
_____)

REBUTTAL TESTIMONY OF
ALLAN D. FREEMAN
MICHIGAN PUBLIC SERVICE COMMISSION

October 21, 2025

**REBUTTAL TESTIMONY OF ALLAN D. FREEMAN
CASE NUMBER U-21870**

1 Q. Are you the same Allan D. Freeman who filed direct testimony in this case?

2 A. Yes, I am.

3 Q. What is the purpose of your rebuttal testimony in this case?

4 A. The purpose of my testimony is to present MPSC Staff's (Staff's) analysis of and position
5 on proposals and arguments made by multiple witnesses related to electric vehicles
6 (EVs).

7 Q. Are you sponsoring any exhibits?

8 A. No.

9 **Direct Current Fast Charger Rebates**

10 Q. What does the Natural Resources Defense Council, the Sierra Club, and the Citizens Utility
11 Board (NRDC/SC/CUB) witness Douglas Jester's testimony propose in regard to Direct
12 Current Fast Chargers (DCFC) rebates?

13 A. NRDC/SC/CUB witness Jester proposes two changes to the DCFC rebate program. First,
14 applicants should be able to request variable rebate amounts.¹ Second, he wants to extend
15 rebate availability to seven years.²

16 Q. What is Staff's position on NRDC/SC/CUB witness Jester's first suggestion?

17 A. Staff is open to his proposal. The federal EV incentive landscape has shifted dramatically
18 this year. Giving Consumers Energy Company (the Company) the flexibility to determine
19 rebate amounts on specific project need may allow for better utilization of the rebate
20 budget. However, the overall DCFC rebate budget should remain unaltered. Increasing the

¹ NRDC/SC/CUB witness Jester's Direct Testimony, p. 21, lines 18-19.

² *Id.*, at, p. 22, lines 1-2.

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1 budget at this time would make the future evaluation of this program and the Company's
2 transportation electrification program more difficult.

3 Q. Does Staff support NRDC/SC/CUB witness Jester's second recommendation?

4 A. No. This proposal is an interesting one and a suggestion worthy of consideration. Staff
5 would like this proposal raised in the Company's next rate case. Doing so would allow the
6 Company to present the financial and programmatic impacts of a seven-year rebate window
7 in detail. This would allow for a fuller vetting of the proposal by both the Company and
8 intervenors.

9 Q. Does this conclude your testimony?

10 A. Yes.

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