

U-21870 Attorney General's Exhibits of Sebastian Coppola

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2020-2024 + Bridge Period and Projected Test Year - Distribution Unit Costs

Line No.	Program / Investment Category	2020			2021			2022			2023			2024			Bridge Period			Projected Test Year		
		(a) Capital	(b) Projects	(c) Unit Cost	(d) Capital	(e) Projects	(f) Unit Cost	(g) Capital	(h) Projects	(i) Unit Cost	(j) Capital	(k) Projects	(l) Unit Cost	(m) Capital	(n) Projects	(o) Unit Cost	(p) Capital	(q) Projects	(r) Unit cost	(s) Capital	(t) Projects	(u) Unit Cost
1	Lines New Business - LVD	\$ 86,752,115	9,188		\$ 111,920,506	10,652		\$ 128,886,338	9,662		\$ 136,184,733	9,980		\$ 116,118,244	9,040		\$ 168,047,000	12,211		\$ 130,200,000	9,252	
2	New Services	\$ 86,752,115	9,188	\$ 9,442	\$ 111,920,506	10,652	\$ 10,507	\$ 128,886,338	9,662	\$ 13,340	\$ 136,184,733	9,980	\$ 13,648	\$ 116,118,244	9,040	\$ 12,971	\$ 168,047,000	12,211	\$ 13,762	\$ 130,200,000	9,252	\$ 14,073
3	Lines Strategic Customers - HVD	\$ 4,037,848	12		\$ 20,268,195	7		\$ 4,279,998	2		\$ 11,070,690	6		\$ 57,836,000	7		\$ 90,045,000	6		\$ 43,860,000	4	
4	Investment Category	\$ 4,037,848	12	\$ 336,487	\$ 20,268,195	7	\$ 2,895,456	\$ 4,279,998	2	\$ 2,139,999	\$ 11,070,690	6	\$ 1,845,115	\$ 57,836,000	7	\$ 8,262,286	\$ 90,045,000	6	\$ 15,007,500	\$ 43,860,000	4	\$ 10,965,000
5	Metro New Business	\$ 4,562,009	34		\$ 2,430,593	23		\$ 1,856,029	43		\$ 1,588,725	41		\$ 11,187,596	34		\$ 6,453,000	14		\$ 7,917,000	10	
6	Projects	\$ 4,562,009	34	\$ 134,177	\$ 2,430,593	23	\$ 105,678	\$ 1,856,029	43	\$ 43,163	\$ 1,588,725	41	\$ 38,749	\$ 11,187,596	34	\$ 329,047	\$ 6,453,000	14	\$ 460,929	\$ 7,917,000	10	\$ 791,700
7	Transformers - LVD	\$ 28,857,324	13,364		\$ 37,927,064	10,433		\$ 49,208,671	12,496		\$ 64,137,462	15,047		\$ 122,886,409	18,954		\$ 227,963,000	24,700		\$ 207,782,000	19,031	
8	Transformers	\$ 28,857,324	13,364	\$ 2,159	\$ 37,927,064	10,433	\$ 3,635	\$ 49,208,671	12,496	\$ 3,938	\$ 64,137,462	15,047	\$ 4,262	\$ 122,886,409	18,954	\$ 6,483	\$ 227,963,000	24,700	\$ 9,229	\$ 207,782,000	19,031	\$ 10,918
New Business																						
9	Lines Reliability - LVD	\$ 33,257,402	1,222		\$ 39,451,348	1,293		\$ 50,631,252	10,745		\$ 34,935,151	7,949		\$ 25,824,724	751		\$ 155,146,000	3,835		\$ 297,474,000	13,362	
10	Targeted Circuit Improvements (projects)	\$ 20,721,283	191	\$ 108,488	\$ 23,427,418	209	\$ 112,093	\$ 42,034,097	10,546	\$ 3,986	\$ 27,278,225	7,798	\$ 3,498	\$ 17,763,268.00	503	\$ 35,315	\$ 117,336,000	675	\$ 173,831	\$ 148,691,000	665	\$ 223,595
11	Pole Replacements (poles)	\$ 8,490,227	1,016	\$ 8,357	\$ 10,599,623	1,055	\$ 10,047	\$ 2,534,948	172	\$ 14,738	\$ 1,894,863	137	\$ 13,831	\$ 1,330,180.00	231	\$ 5,758	\$ 29,711,000	3,076	\$ 9,659	\$ 127,500,000	12,500	\$ 10,200
12	Circuit Exit Enhancements (projects)	\$ 505,437	15	\$ 33,896	\$ 1,266,069	29	\$ 43,658	\$ 1,403,810	27	\$ 51,993	\$ 655,794	14	\$ 46,842	\$ 529,500.00	17	\$ 31,147	\$ 1,911,000	84	\$ 22,750	\$ 3,616,000	197	\$ 18,355
13	ROW Easements	\$ 3,540,456	N/A		\$ 4,158,238	N/A		\$ 4,658,397	N/A		\$ 5,106,269	N/A		\$ 6,201,772.00	N/A		\$ 6,988,000	N/A		\$ 17,667,000	N/A	
14	Lines Reliability - HVD	\$ 22,289,686	491		\$ 58,092,338	570		\$ 42,565,119	715		\$ 21,703,195	254		\$ 32,263,573	552		\$ 122,598,000	2,129		\$ 100,250,000	1,467	
15	Line rebuilds (miles)	\$ 8,251,822	23	\$ 358,775	\$ 32,946,529	32	\$ 1,029,579	\$ 18,219,292	40	\$ 455,482	\$ 15,077,709	9	\$ 1,675,301	\$ 8,976,122	12	\$ 748,010	\$ 38,614,000	13	\$ 2,970,308	\$ 35,743,000	66	\$ 543,207
16	Pole top rehabilitations (miles)	\$ 3,960,563	46	\$ 86,099	\$ 13,583,527	110	\$ 123,487	\$ 7,195,963	95	\$ 75,747	\$ 504,706	7	\$ 72,101	\$ 5,583,078	49	\$ 113,940	\$ 9,097,000	55	\$ 166,307	\$ 11,996,000	116	\$ 103,325
17	Pole replacements (poles)	\$ 8,012,838	389	\$ 20,599	\$ 9,739,363	402	\$ 24,227	\$ 15,152,831	545	\$ 27,803	\$ 6,011,798	234	\$ 25,691	\$ 16,201,485	488	\$ 33,200	\$ 54,856,000	2,010	\$ 27,292	\$ 33,569,000	1,230	\$ 27,292
18	Switches (incl. SCADA additions) (locations)	\$ 2,064,464	33	\$ 62,560	\$ 1,822,919	26	\$ 70,112	\$ 1,997,034	35	\$ 57,058	\$ 108,982	4	\$ 27,245	\$ 607,027	3	\$ 202,342	\$ 7,364,000	51	\$ 144,392	\$ 7,942,000	55	\$ 144,400
19	ROW Easements													\$ 895,861			\$ 12,667,000			\$ 11,000,000		
20	Substations Reliability - LVD	\$ 12,583,299	38		\$ 19,017,331	85		\$ 16,884,427	72		\$ 14,708,696	16		\$ 17,573,928	48		\$ 43,099,000	46		\$ 38,097,000	39	
21	New or rebuilt substations	\$ 4,680,033	4	\$ 1,170,008	\$ 1,124,659	2	\$ 562,330	\$ 4,628,403	4	\$ 1,157,101	\$ 6,067,843	3	\$ 2,022,614	\$ 9,317,237	7	\$ 1,331,034	\$ 28,200,000	17	\$ 1,658,824	\$ 18,990,000	12	\$ 1,582,500
22	Mobile substations	\$ 4,333,957	3	\$ 1,444,652	\$ 4,745,155	1	\$ 4,745,155	\$ 3,333,542	1	\$ 3,333,542	\$ 2,250,653	2	\$ 1,125,327	\$ 25,620	-	\$ -	\$ 3,350,000	3	\$ 1,116,667	\$ 8,993,000	2	\$ 4,496,500
23	Animal mitigation	\$ 2,327,943	19	\$ 122,523	\$ 4,655,023	50	\$ 93,100	\$ 4,701,094	31	\$ 151,648	\$ 1,026,099	6	\$ 171,017	\$ 2,219,122	18	\$ 123,285	\$ 1,372,000	13	\$ 105,538	\$ 1,950,000	14	\$ 139,286
24	Regulator replacements	\$ 43,434	1	\$ 43,434	\$ 879,762	15	\$ 58,651	\$ 728,105	31	\$ 23,487	\$ 5,481	-	\$ -	\$ 715,226	14	\$ 51,088	\$ 300,000	4	\$ 75,000	\$ 450,000	6	\$ 75,000
25	Transformer replacements	\$ 108,389	-		\$ 5,115,612	7	\$ 730,802	\$ 3,287,007	3	\$ 1,095,669	\$ 5,245,914	3	\$ 1,748,638	\$ 3,894,229	3	\$ 1,298,076	\$ 9,877,000	9	\$ 1,097,444	\$ 7,714,000	5	\$ 1,542,800
26	Other Projects and Charges	\$ 1,089,542	11	\$ 99,049	\$ 2,497,118	10	\$ 249,712	\$ 206,276	2	\$ 103,138	\$ 112,705	2	\$ 56,353	\$ 1,402,494	6	\$ 233,749						
27	Substations Reliability - HVD	\$ 5,100,000	61		\$ 3,455,799	59		\$ 3,992,844	62		\$ 3,261,649	42		\$ 5,715,476	55		\$ 47,322,000	295		\$ 39,680,000	201	
28	Circuit breaker/switcher replacements	\$ 3,673,000	27	\$ 136,037	\$ 2,216,790	19	\$ 116,673	\$ 1,470,249	14	\$ 105,018	\$ 2,678,521	17	\$ 157,560	\$ 2,659,728	20	\$ 132,986	\$ 20,038,000	63	\$ 318,063	\$ 23,737,000	74	\$ 320,770
29	Transformer bushing replacements	\$ 550,000	7	\$ 78,571	\$ 539,983	5	\$ 107,997	\$ 472,881	4	\$ 118,220	\$ 38,952	N/A	N/A	\$ 1,367,384	10	\$ 136,739	\$ 2,185,000	17	\$ 128,529	\$ 1,356,000	10	\$ 135,600
30	Switch replacements	\$ 257,000	10	\$ 25,700	\$ 567,972	12	\$ 47,331	\$ 909,232	12	\$ 41,329	\$ 211,344	5	\$ 42,269	\$ 1,083,967	10	\$ 108,397	\$ 2,822,000	46	\$ 61,348	\$ 1,829,000	34	\$ 53,794
31	Other	\$ 620,000	17	\$ 36,471	\$ 131,054	23	\$ 5,698	\$ 1,140,482	22	\$ 51,840	\$ 332,832	20	\$ 16,642	\$ 604,397	15	\$ 40,293	\$ 22,277,000	169	\$ 131,817	\$ 12,758,000	83	\$ 153,711
32	System Protection	\$ 2,626,241	58		\$ 2,620,098	13		\$ 4,503,577	41		\$ 4,386,998	36		\$ 4,848,000	17		\$ 6,768,000	61		\$ 4,098,000	24	
33	Total Relay Replacements	\$ 2,626,241	58	\$ 45,280	\$ 2,620,098	13	\$ 201,546	\$ 4,503,577	41	\$ 109,843	\$ 4,386,998	36	\$ 121,861	\$ 4,848,000	17	\$ 285,176	\$ 6,768,000	61	\$ 110,951	\$ 4,098,000	24	\$ 170,750
34	Repetitive Outages - LVD	\$ 4,349,846	251		\$ 10,713,652	350		\$ 9,253,597	346		\$ 4,082,239	122		\$ 4,491,324	215		\$ 21,089,000	246		\$ 30,344,000	337	
35	Total Repetitive Outage Projects	\$ 4,349,846	251	\$ 17,330	\$ 10,713,652	350	\$ 30,610	\$ 9,253,597	346	\$ 26,744	\$ 4,082,239	122	\$ 33,461	\$ 4,491,324	215	\$ 20,890	\$ 21,089,000	246	\$ 85,728	\$ 30,344,000	337	\$ 90,042
36	Metro Reliability	\$ 3,515,708	7		\$ 5,737,248	20		\$ 4,124,833	37		\$ 3,985,200	35		\$ 6,689,896	22		\$ 4,829,000	7		\$ 3,998,000	7	
37	Obsolete or Needed Civil Assets	\$ 1,150,446	2	\$ 575,223	\$ 1,769,322	1	\$ 1,769,322	\$ 712,306	9	\$ 79,145	\$ 1,554,333	5	\$ 310,867	\$ 3,228,969	6	\$ 538,161	\$ 1,000,000	1	\$ 1,000,000	\$ 2,300,000	2	\$ 1,150,000
38	Obsolete or Needed Electrical Assets	\$ 2,247,443	5	\$ 449,489	\$ 2,085,336	14	\$ 148,953	\$ 1,559,203	16	\$ 97,450	\$ 624,775	15	\$ 41,652	\$ 684,703	8	\$ 85,588	\$ 704,000	2	\$ 352,000	\$ 1,098,000	3	\$ 366,000
39	Dead Fronting Equipment	\$ 55,427	-		\$ 1,827,937	4	\$ 456,984	\$ 1,832,347	10	\$ 183,235	\$ 873,040	13	\$ 67,157	\$ 1,634,741	5	\$ 326,948	\$ 1,125,000	2	\$ 562,500	\$ 600,000	2	\$ 300,000
40	New Technologies	\$ 62,393	-		\$ 54,653	1		\$ 20,978	2	\$ 10,489	\$ 933,052	2	\$ 466,526	\$ 1,141,484	3	\$ 380,495	\$ 2,000,000	2	\$ 1,000,000			
41	Grid Automation	\$ 72,283,929	1,748		\$ 74,153,885	2,343		\$ 52,816,893	3,167		\$ 29,037,543	2,575		\$ 20,195,352	3,206		\$ 48,635,000	1,348		\$ 44,950,000	194	
42	DSCADA & SCADA	\$ 18,184,037	64	\$ 284,126	\$ 19,213,429	84	\$ 228,731	\$ 13,954,409	64	\$ 218,038	\$ 5,446,740	81	\$ 495,158	\$ 1,341	0		\$ 5,405,000	15	\$ 360,333	\$ 4,814,000	11	\$ 437,636
43	ATR Loops	\$ 12,579,111	22	\$ 571,778	\$ 16,707,963	25	\$ 668,319	\$ 15,868,980	36	\$ 440,805	\$ 11,110,673	24	\$ 462,945				\$ 17,539,000	39	\$ 449,718	\$ 22,299,000	40	\$ 557,475
44	Line Sensors	\$ 7,096,826	1,100	\$ 6,452	\$ 8,085,793	1,719	\$ 4,704	\$ 3,518,698	2,342	\$ 1,502	\$ 5,969,833	2,379	\$ 2,509	\$ 10,831,582	2979							

2020-2024 + Bridge Period and Projected Test Year - Distribution Unit Costs

Line No.	Program / Investment Category	2020			2021			2022			2023			2024			Bridge Period			Projected Test Year		
		(a) Capital	(b) Projects	(c) Unit Cost	(d) Capital	(e) Projects	(f) Unit Cost	(g) Capital	(h) Projects	(i) Unit Cost	(j) Capital	(k) Projects	(l) Unit Cost	(m) Capital	(n) Projects	(o) Unit Cost	(p) Capital	(q) Projects	(r) Unit Cost	(s) Capital	(t) Projects	(u) Unit Cost
MICHIGAN PUBLIC SERVICE COMMISSION Consumers Energy Company																						
2020-2024 + Bridge Period and Projected Test Year - Distribution Unit Costs																						
53	Lines and Subs Rehabilitation HVD (now Transformer Replacements & Sub Rebuilds)	\$ 15,460,833	661		\$ 29,896,106	779		\$ 39,183,968	867		\$ 28,395,172	634		\$ 26,676,254	603		\$ 55,624,000	950		\$ 43,335,000	600	
54	Pole replacements	\$ 4,777,998	249	\$ 19,189	\$ 4,007,742	227	\$ 17,655	\$ 7,098,950	291	\$ 24,395	\$ 4,277,002	146	\$ 29,295	\$ 6,981,392	284	\$ 24,582						
55	Pole top assembly replacements	\$ 3,020,281	373	\$ 8,097	\$ 5,597,280	541	\$ 10,346	\$ 5,579,111	563	\$ 9,910	\$ 4,061,358	482	\$ 8,426	\$ 3,056,556	301	\$ 10,155	\$ 8,958,000	950	\$ 9,429	\$ 5,658,000	600	\$ 9,430
56	Switch (incl. MOAB) replacements	\$ 760,267	15	\$ 50,684	\$ 552,306	4	\$ 138,077	\$ 958,270	10	\$ 95,827	\$ 273,642	5	\$ 54,728	\$ 1,422,525	17	\$ 83,678						
57	Miscellaneous other replacements	\$ 63,772	24	\$ 2,657	\$ 46,576	7	\$ 6,654	\$ 186,377	3	\$ 62,126	\$ 181,203	1	\$ 181,203	\$ 24,695	1	\$ 24,695						
58	HVD substation replacement projects	\$ 6,838,515			\$ 19,692,073			\$ 25,361,260			\$ 19,601,967			\$ 15,191,086			\$ 46,666,000			\$ 37,677,000		
59	Substations Rehabilitation LVD	\$ 9,838,498	17		\$ 18,379,139	32		\$ 10,941,033	20		\$ 8,481,963	12		\$ 13,860,340	11		\$ 40,895,000	52		\$ 31,147,000	31	
60	Allis Chalmers transformer replacements	\$ 6,541,995	6	\$ 1,090,333	\$ 12,464,595	15	\$ 830,973	\$ 6,408,239	5	\$ 1,281,648	\$ 4,499,628	4	\$ 1,124,907	\$ 6,018,840	3	\$ 2,006,280	\$ 22,465,000	26	\$ 864,038	\$ 14,548,000	18	\$ 808,222
61	Equipment replacement and regulatory	\$ 3,296,503	11	\$ 299,682	\$ 3,908,037	14	\$ 279,146	\$ 3,077,226	13	\$ 236,710	\$ 3,982,335	8	\$ 497,792	\$ 7,841,500	8	\$ 980,187	\$ 18,430,000	26	\$ 708,846	\$ 16,599,000	13	\$ 1,276,846
62	Transformer at imminent risk of failure	\$ -	-		\$ 2,006,506	3	\$ 668,835	\$ 1,455,568	2	\$ 727,784	\$ -	-	\$ -	\$ -	-	\$ -						
63	Lines Rehabilitation - LVD	\$ 22,330,935	1,050		\$ 33,547,774	809		\$ 29,068,083	804		\$ 12,529,815	584		\$ 44,434,897	9,959		\$ 53,208,000	10,242		\$ 37,751,000	7,465	
64	Security assessment repairs projects*	\$ 14,423,542	220	\$ 65,562	\$ 23,684,410	267	\$ 88,706	\$ 19,095,171	188	\$ 101,570	\$ 7,641,659	180	\$ 42,454	\$ 31,650,187	8,893	\$ 3,559	\$ 35,100,000	9,000	\$ 3,900	\$ 25,350,000	6,500	\$ 3,900
65	Imminent rehabilitation	\$ 7,907,393	830	\$ 9,527	\$ 9,863,364	542	\$ 18,198	\$ 9,972,912	616	\$ 16,190	\$ 4,888,156	404	\$ 12,099	\$ 11,592,837.00	577	\$ 20,092	\$ 15,120,000	442	\$ 34,208	\$ 9,413,000	165	\$ 57,048
66	Modern Replacement Program	\$ -	-		\$ -	-		\$ -	-		\$ -	-		\$ 1,191,873.00	489	\$ 2,437	\$ 2,988,000	800	\$ 3,735	\$ 2,988,000	800	\$ 3,735
67	Metro Rehabilitation	\$ 6,181,167	4		\$ 3,163,241	7		\$ 4,678,237	25		\$ 7,033,641	25		\$ 2,687,522	22		\$ 7,987,000	10		\$ 5,993,000	4	
68	Crushed duct replacements	\$ 162,092	1	\$ 162,092	\$ 2,545,721	5	\$ 509,144	\$ 1,562,800	5	\$ 312,560	\$ 2,704,924	7	\$ 386,418	\$ 513,480	6	\$ 85,580	\$ 1,300,000	2	\$ 650,000	\$ 4,993,000	2	\$ 2,496,500
69	Vault or manhole rehabilitation	\$ 6,019,075	3	\$ 2,006,358	\$ 617,520	2	\$ 308,760	\$ 3,115,436	20	\$ 155,772	\$ 4,328,718	18	\$ 240,484	\$ 2,070,385	11	\$ 188,217	\$ 6,687,000	8	\$ 835,875	\$ 1,000,000	2	\$ 500,000
70	Imminent failure	\$ -	-		\$ -	-		\$ -	-		\$ -	-		\$ 103,657	5	\$ 20,731						
71	Capacity Upgrade Deferral	\$ 2,148,443	1	\$ 2,148,443	\$ 4,293,304	1	\$ 4,293,304	\$ 219,727	1	\$ 219,727	\$ -	-		\$ -	-							
72	Islanded Battery	\$ 127,460.00	1	\$ 127,460	\$ 161,717	1	\$ 161,717	\$ 357,301	1	\$ 357,301	\$ -	-		\$ -	-							
73	Distribution Automation Battery	\$ -	-		\$ 1,389	1	\$ 1,389	\$ -	-		\$ -	-		\$ -	-							
74	DC-coupled Solar + Storage	\$ 275,746	1	\$ 275,746	\$ 9,825	1	\$ 9,825	\$ -	-		\$ -	-		\$ -	-							
75	Fast Frequency Regulation Market participation	\$ -	-		\$ 139,988	1	\$ 139,988	\$ 6,110	1	\$ 6,110	\$ -	-		\$ -	-							
76	Parkview Battery Main Controller Replacement	\$ -	-		\$ -	-		\$ 63,529	1	\$ 63,529	\$ -	-		\$ -	-							
77	Reliability	\$ -	-		\$ -	-		\$ -	-		\$ -	-		\$ -	-							
*Security assessment repair now in LVD Lines Demand Failures - see testimony of witness Partian																						
78	Lines Capacity - LVD	\$ 9,835,702	48		\$ 8,216,776	42		\$ 7,706,145	63		\$ 2,926,592	45		\$ 9,424,100	76		\$ 28,580,000	137		\$ 54,911,000	281	
79	Overloaded equipment upgrades	\$ 5,179,895	40	\$ 129,497	\$ 5,228,367	34	\$ 153,776	\$ 7,434,754	59	\$ 126,013	\$ 275,156	29	\$ 9,488	\$ 6,336,921	56	\$ 113,159	\$ 21,365,000	125	\$ 170,920	\$ 53,103,000	278	\$ 191,018
80	Lines capacity projects assoc. w/ substation work	\$ 4,655,806	8	\$ 581,976	\$ 2,988,409	8	\$ 373,551	\$ 271,391	4	\$ 67,848	\$ 2,651,436	16	\$ 165,715	\$ 3,087,179	20	\$ 154,359	\$ 7,215,000	12	\$ 601,250	\$ 1,808,000	3	\$ 602,667
81	Lines & Subs Capacity - HVD	\$ 19,247,493	55		\$ 17,365,080	53		\$ 29,292,429	135		\$ 25,805,134	89		\$ 27,163,000	95		\$ 40,912,000	56		\$ 29,447,000	27	
82	Load carrying capabilities and voltage support	\$ 1,848,011	8	\$ 231,001	\$ 4,162,164	2	\$ 2,081,082	\$ 9,364,969	3	\$ 3,121,656	\$ 6,578,947	2	\$ 3,289,473	\$ 4,974,403	1	\$ 4,974,403	\$ 16,494,000	4	\$ 4,123,500	\$ 7,701,000	3	\$ 2,567,000
83	New interconnections	\$ 3,203,194	11	\$ 291,199	\$ 239,077	12	\$ 19,923	\$ 2,457,816	15	\$ 163,854	\$ 1,160,532	25	\$ 46,421	\$ (1,012,641)	11	\$ (92,058)	\$ -	-		\$ -	\$ -	
84	Improved functionality	\$ 3,749,722	16	\$ 234,358	\$ 4,230,554	16	\$ 264,410	\$ 9,761,576	91	\$ 107,270	\$ 8,899,117	16	\$ 556,196	\$ 13,775,703	43	\$ 320,365	\$ 12,153,000	29	\$ 419,069	\$ 7,441,000	12	\$ 620,083
85	Coordination with Transmission	\$ 5,722,701	9	\$ 635,856	\$ 3,983,908	17	\$ 234,348	\$ 2,733,013	4	\$ 683,253	\$ 2,016,771	5	\$ 403,354	\$ 8,786,917	5	\$ 1,757,383	\$ 6,293,000	15	\$ 419,533	\$ 9,226,000	9	\$ 1,025,111
86	ROW procurement	\$ 4,723,865	11	\$ 429,442	\$ 4,749,378	6	\$ 791,563	\$ 4,975,056	22	\$ 226,139	\$ 7,149,768	41	\$ 174,385	\$ 638,618	35	\$ 18,246	\$ 5,972,000	8	\$ 746,500	\$ 5,079,000	3	\$ 1,693,000
87	Substations Capacity - LVD	\$ 10,685,958	61		\$ 15,068,327	79		\$ 12,766,649	73		\$ 14,529,968	65		\$ 25,886,601	20		\$ 29,656,000	23		\$ 22,251,000	15	
88	New substations	\$ 6,789,662	-	\$ -	\$ 8,974,225	5	\$ 1,794,845	\$ 4,186,031	3	\$ 1,395,344	\$ 7,436,504	-	\$ -	\$ 19,741,625	8	\$ 2,467,703	\$ 5,136,000	4	\$ 1,284,000	\$ 20,303,000	11	\$ 1,845,727
89	Existing substations capacity increase projects	\$ 2,735,880	18	\$ 151,993	\$ 5,146,266	17	\$ 302,722	\$ 6,947,750	7	\$ 992,536	\$ 4,607,030	8	\$ 575,879	\$ 6,144,976	12	\$ 512,081	\$ 24,520,000	19	\$ 1,290,526	\$ 1,948,000	4	\$ 487,000
90	Other Projects and Charges	\$ 1,160,416	43	\$ 26,886	\$ 947,835	57	\$ 16,629	\$ 1,632,869	63		\$ 2,486,433	57	\$ 43,622	\$ -	-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -

2020-2024 + Bridge Period and Projected Test Year - Distribution Unit Costs

Line No.	Program / Investment Category	2020			2021			2022			2023			2024			Bridge Period			Projected Test Year		
		(a) Capital	(b) Projects	(c) Unit Cost	(d) Capital	(e) Projects	(f) Unit Cost	(g) Capital	(h) Projects	(i) Unit Cost	(j) Capital	(k) Projects	(l) Unit Cost	(m) Capital	(n) Projects	(o) Unit Cost	(p) Capital	(q) Projects	(r) Unit Cost	(s) Capital	(t) Projects	(u) Unit Cost
MICHIGAN PUBLIC SERVICE COMMISSION Consumers Energy Company																						
2020-2024 + Bridge Period and Projected Test Year - Distribution Unit Costs																						
91	New Business Cap - LVD	\$ 17,766,617	1,257		\$ 23,672,169	1,563		\$ 27,187,902	1,544		\$ 29,054,330	1,438		\$ 33,429,196	1,294		\$ 38,180,000	1,477		\$ 30,130,000	1,116	
92	Orders	\$ 17,766,617	1,257	\$ 14,134	\$ 23,672,169	1,553	\$ 15,243	\$ 27,187,902	1,544	\$ 17,609	\$ 29,054,330	1,438	\$ 20,205	\$ 33,429,196	1,294	\$ 25,834	\$ 38,180,000	1,477	\$ 25,850	\$ 30,130,000	1,116	\$ 26,998
93	Conservative Voltage Reduction CVR	\$ 1,936,594	76		\$ 7,191,371	204		\$ 3,145,109	160		\$ 1,310,828	38		\$ 2,246,180	56		\$ 5,586,000	85		\$ 4,070,000	85	
94	Construct Project	\$ 1,936,594	76	\$ 25,482	\$ 7,191,371	204	\$ 35,252	\$ 3,145,109	160	\$ 19,657	\$ 1,310,828	38	\$ 34,495	\$ 2,246,180	56	\$ 40,110	\$ 5,586,000	85	\$ 65,718	\$ 4,070,000	85	\$ 47,882
Capacity																						
95	Lines Failures - LVD	\$ 105,177,291	31,125		\$ 123,508,957	29,986		\$ 142,776,767	31,785		\$ 159,370,587	31,508		\$ 137,322,405	25,905		\$ 151,050,000	28,500		\$ 103,350,000	19,500	
96	Service Restoration Orders	\$ 105,177,291	31,125	\$ 3,379	\$ 123,508,957	29,986	\$ 4,119	\$ 142,776,767	31,785	\$ 4,492	\$ 159,370,587	31,508	\$ 5,058	\$ 137,322,405	25,905	\$ 5,301	\$ 151,050,000	28,500	\$ 5,300	\$ 103,350,000	19,500	\$ 5,300
97	Lines & Subs Failures - HVD	\$ 6,782,000	156		\$ 6,051,000	206		\$ 10,015,000	256		\$ 13,623,830	433		\$ 11,705,270	299		\$ 8,295,501	217		\$ 10,000,000	263	
98	Pole replacements	\$ 2,017,000	69	\$ 29,200	\$ 1,618,000	86	\$ 18,800	\$ 2,515,000	76	\$ 33,092	\$ 2,955,115	97	\$ 30,465	\$ 4,434,237	97	\$ 45,714	\$ 2,387,000	80	\$ 29,838	\$ 2,877,857	97	\$ 29,669
99	Pole top assembly replacements	\$ 1,351,000	74	\$ 18,200	\$ 905,000	109	\$ 8,300	\$ 886,000	86	\$ 10,302	\$ 1,568,123	156	\$ 10,052	\$ 1,514,290	156	\$ 9,707	\$ 984,608	113	\$ 8,713	\$ 1,186,846	137	\$ 8,663
100	Switch (incl. MOAB) replacements	\$ 697,000	7	\$ 99,500	\$ 1,193,000	9	\$ 132,600	\$ 1,716,000	12	\$ 143,000	\$ 574,376	5	\$ 114,875	\$ 849,749	5	\$ 169,950	\$ 735,631	6	\$ 122,605	\$ 886,730	7	\$ 126,676
101	Miscellaneous other replacements	\$ 69,000	6	\$ 11,500	\$ 75,000	2	\$ 37,300	\$ 38,000	8	\$ 4,750	\$ 130,672	41	\$ 3,187	\$ 489,181	41	\$ 11,931	\$ 312,262	18	\$ 17,348	\$ 376,400	22	\$ 17,109
102	HVD substation failure projects	\$ 2,648,000	N/A		\$ 2,260,000	N/A		\$ 4,860,000	74	\$ 65,676	\$ 8,295,544	134	\$ 61,907	\$ 4,417,813			\$ 3,876,000			\$ 4,672,167		
103	Substations Failures - LVD	\$ 9,175,091	386		\$ 12,781,598	298		\$ 8,055,636	239		\$ 14,868,807	216		\$ 11,478,428	258		\$ 11,923,000	173		\$ 8,961,000	114	
104	Allis Chalmers Substation Transformer Replacements	\$ -	-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -
105	Regulators	\$ 2,401,031	72	\$ 33,348	\$ 2,793,635	86	\$ 32,484	\$ 2,294,466	67	\$ 34,246	\$ 3,043,913	52	\$ 58,537	\$ 5,289,888	88	\$ 60,112	\$ 5,280,000	80	\$ 66,000	\$ 3,960,000	60	\$ 66,000
106	Reclosers	\$ 914,337	63	\$ 14,513	\$ 867,933	53	\$ 16,376	\$ 999,513	58	\$ 17,233	\$ 824,022	34	\$ 24,236	\$ 1,686,206	50	\$ 33,724	\$ 1,200,000	48	\$ 25,000	\$ 900,000	36	\$ 25,000
107	Transformers	\$ 2,134,244	5	\$ 426,849	\$ 5,957,753	6	\$ 992,959	\$ 1,429,349	2	\$ 714,674	\$ 3,296,081	4	\$ 824,020	\$ 539,677	1	\$ 539,677	\$ 3,380,000	4	\$ 845,000	\$ 3,380,000	4	\$ 845,000
108	End-of-Life Condition - Substation Rebuild	\$ -	-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -
109	Other Equipment and Charges	\$ 3,725,479	246	\$ 15,144	\$ 3,162,277	153	\$ 20,668	\$ 3,332,308	112	\$ 29,753	\$ 7,704,792	126	\$ 61,149	\$ 3,962,656	119	\$ 33,300	\$ 2,063,000	41	\$ 50,317	\$ 721,000	14	\$ 51,500
110	Meters - LVD	\$ 22,589,488	62,437		\$ 22,368,078	205,706		\$ 30,974,526	122,436		\$ 58,653,212	148,820		\$ 35,076,620	71,154		\$ 45,126,000	69,085		\$ 37,770,000	51,814	
111	Meters, Transformers, & Sockets	\$ 22,589,488	62,437	\$ 362	\$ 22,368,078	205,706	\$ 109	\$ 30,974,526	122,436	\$ 253	\$ 58,653,212	148,820	\$ 394	\$ 35,076,620	71,154	\$ 493	\$ 45,126,000	69,085	\$ 653	\$ 37,770,000	51,814	\$ 729
112	Metro Failures	\$ 1,040,542	17		\$ 50,156	11		\$ 121,581	24		\$ 463,641	22		\$ 17,531	10		\$ 664,000	N/A		\$ 350,000	N/A	
113	Projects	\$ 1,040,542	17	\$ 61,208	\$ 50,156	11	\$ 4,560	\$ 121,581	24	\$ 5,068	\$ 463,641	22	\$ 21,075	\$ 17,531	10	\$ 1,753	\$ 664,000	N/A		\$ 350,000	N/A	
Demand Failures																						
114	Lines Relocations - LVD	\$ 32,961,000	3,525		\$ 38,895,000	3,949		\$ 52,814,000	3,727		\$ 46,849,000	3,985		\$ 51,502,458	4,582		\$ 97,911,000	11,860		\$ 79,090,000	9,951	
115	Customer requested and other internal relocations	\$ 23,527,000	2,557	\$ 9,201	\$ 27,202,000	2,856	\$ 9,525	\$ 27,091,000	2,257	\$ 12,003	\$ 26,696,000	2,131	\$ 12,527	\$ 25,443,532	2,718	\$ 9,361	\$ 45,018,000	4,163	\$ 10,814	\$ 32,341,000	3,379	\$ 9,571
116	LVD underbuild relocations	\$ 4,071,000	216	\$ 18,847	\$ 5,240,000	264	\$ 19,848	\$ 11,149,000	234	\$ 47,645	\$ 7,130,000	199	\$ 35,829	\$ 5,635,991	224	\$ 25,161	\$ 7,056,000	N/A		\$ 7,484,000	N/A	
117	Make-ready work	\$ 5,363,000	752	\$ 7,132	\$ 6,453,000	829	\$ 7,784	\$ 14,574,000	1,236	\$ 11,791	\$ 13,023,000	1,655	\$ 7,869	\$ 20,422,935	1,640	\$ 12,453	\$ 45,837,000	7,697	\$ 5,955	\$ 39,265,000	6,572	\$ 5,975
118	Lines Relocations - HVD	\$ 1,906,321	15		\$ 1,709,173	17		\$ 2,564,824	18		\$ 5,319,332	36		\$ 844,774	29		\$ 1,197,000			\$ 899,000		
119	Projects	\$ 1,906,321	15	\$ 127,088	\$ 1,709,173	17	\$ 100,540	\$ 2,564,824	18	\$ 142,490	\$ 5,319,332	36	\$ 147,759	\$ 844,774	29	\$ 29,130	\$ 1,197,000	N/A		\$ 899,000	N/A	
120	Metro Relocations	\$ 3,815,325	5		\$ 6,549,541	16		\$ 6,887,820	43		\$ 5,160,711	47		\$ 11,420,267	27		\$ 16,094,000	15		\$ 20,405,000	13	
121	Projects	\$ 3,815,325	5	\$ 763,065	\$ 6,549,541	16	\$ 409,346	\$ 6,887,820	43	\$ 160,182	\$ 5,160,711	47	\$ 109,802	\$ 11,420,267	27	\$ 422,973	\$ 16,094,000	15	\$ 1,072,933	\$ 20,405,000	13	\$ 1,569,615
Asset Relocations																						
122	Computer & Equipment	\$ 2			\$ 378			\$ 6,272,688			\$ 412,000			\$ -			\$ 75,000			\$ 75,000		
123	Tools	\$ 5,691,000	47		\$ 11,114,404	374		\$ 3,757,000	-		\$ 5,537,898			\$ 7,773,000			\$ 10,001,000			\$ 8,248,000		
124	Truck tool packages	\$ 2,736,000	47	\$ 58,213	\$ 5,885,000	169	\$ 34,822	\$ -	-		\$ 977,898	16	\$ 61,119	\$ 727,000	24	\$ 30,292	\$ 3,362,000	93	\$ 36,151	\$ 2,015,000	62	\$ 32,500
125	General capital tools	\$ 2,955,000			\$ 3,399,728			\$ 2,557,000			\$ 4,560,000			\$ 7,046,000			\$ 6,639,000			\$ 6,233,000		
126	Reconducting Equipment				\$ 516,068	8		\$ 125,000														
127	Employee fall restraint kits				\$ 426,424	136		\$ 420,000														
128	Substation bird mitigation equipment				\$ 48,000	4		\$ 70,000														
129	Tool crib/cabinet stock				\$ 600,000	30		\$ 225,000														
130	Infrared Cameras				\$ 54,384	21		\$ -														
131	Substation control house battery carts				\$ 16,800	3		\$ 35,000														
132	Breaker and HVD equipment testers				\$ 168,000	3		\$ 325,000														
133	System Control Projects	\$ 1,889,641	27		\$ 1,193,499	107		\$ 2,520,610	11	\$ 229,146	\$ 41,289	4		\$ 896,025	8		\$ 372,000			\$ 219,000		
134	HVD operations projects	\$ 718,531	22	\$ 32,661	\$ 180,135	96	\$ 1,876	\$ 1,836,500	7	\$ 262,357	\$ -	-		\$ -	-		\$ -	-		\$ -	-	
135	HVD Remote M&C Cap	\$ -	-		\$ -	-		\$ -	-		\$ -	-		\$ -	-		\$ -	-		\$ -	-	
136	Operating technology enhancements	\$ 250,000	2	\$ 125,000	\$ (23,803)	1	\$ (23,803)	\$ 192,510	2	\$ 96,255	\$ -	-		\$ -	-		\$ -	-		\$ -	-	
137	Operations center modifications	\$ 921,110	3	\$ 307,037	\$ 1,037,167	10	\$ 103,717	\$ 491,600	2	\$ 245,800	\$ 41,289	4	\$ 10,322	\$ 896,025	8	\$ 112,003	\$ -	-		\$ -	-	
138	Emergency Operations Center	\$ 816,515	1	\$ 816,515	\$ -	-		\$ -	-		\$ -	-		\$ -	-		\$ -	-		\$ -	-	

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Question:

49. Refer to Figure 5 on page 13 of Ms. Partlan's direct testimony on LVD new service connections. Please:

- a. Explain what caused the unit cost to decline in 2024.
- b. Show how the unit costs for the bridge period and projected test year were determined in Excel.

Response:

Objection of Counsel: Consumers Energy Company objects to this discovery request because it requests information in a format that the Company has not created. Without waiving this objection, Consumers Energy responds as follows:

- a. The Company has undertaken a cross-functional unit cost reduction effort for new service connections. This has included detailed design reviews, ensuring material availability, and improving labor hour planning for both contractors and Company crews. By using digital forecasting tools, the Company has improved operational precision and cost effectiveness in this area.
- b. The Company did not create an Excel model to calculate forecasted unit costs. Projected spending and projected new services were both developed by extrapolating from historical actuals. A projected unit cost could be calculated by dividing the two.

Witness: Jennifer M Partlan

Date: September 8, 2025

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Question:

51. Refer to Figure 7 on page 15 of Ms. Partlan's direct testimony on LVD new service connection cost between Company and contractors. Please:

- a. Expand the table to include the same information for each year 2025 to 2027 and provide it in Excel.
- b. Explain why the contractor unit cost in 2024 is still nearly double in comparison to the Company's unit cost.
- c. Provide the total amount paid to each contractor in 2024 for this work with related units installed by the contractor and the amount forecasted for 2025, 2026, and 2027 in Excel.
- d. Explain when the Company last bid this work out to contractors, the number of contractors who received the Request for Proposal, and the number who responded.

Response:

- a. The Company does not have projected unit costs broken down by Company and contractor for the years 2025 through 2027. This is primarily due to the shared use of contracted ancillary services—such as boring and hydrovac—by both Company and contracted crews. As a result, the projected unit cost attribution between the two groups has not been distinctly separated.
- b. The observed variance in unit costs between Company crews and Contractor crews is primarily attributable to differences in the way ancillary services are accounted for within each cost structure. Specifically, the unit cost associated with Contractor crews reflects a comprehensive aggregation of all ancillary services required to complete the work. These services include, but are not limited to, bore operations, traffic control, hydrovac, and other subcontracted support activities. As a result, the Contractor unit cost represents a rate that encompasses both direct labor and all associated third-party services. In contrast, the Company crew unit cost is calculated based solely on internal labor and direct operational expenses. Ancillary services utilized by Company crews are typically procured and accounted for separately, outside of the unit cost framework. This accounting methodology results in a lower apparent unit cost for Company crews, although the total cost to perform equivalent or different work may be comparable once all ancillary services are included.
- c. Please reference parts a and b of this response. The future years are not forecasted and the projected cost attribution between the two groups is not distinctly separated.
- d. Bids were sent to 28 companies in 2022 and 21 responded. Of the 21, 7 were invited to face-to-face workshops and overall highest scoring bidders were moved forward to negotiations. The new contractors were in place on 3/1/2023.

Witness: Jennifer M Partlan
Date: September 9, 2025

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Question:

55. Refer to Figure 15 on page 33 of Ms. Partlan's direct testimony on LVD asset relocations make-ready orders. Please:

- a. Provide the basis for the significant increase in the number of make ready orders for 2025, 2026, and 2027.
- b. Provide the number of make-ready orders received each month in 2025 through August, or the latest month available, and the comparable months in 2024 in Excel.

Response:

- a. The basis for this increase is explained on page 34, lines 2 through 5 of my direct testimony. Please also see the discussion in discovery response 21870-ST-CE-0078.
- b. Please see Attachment 1 to this response. This attachment shows the number of applications for make ready work received by the Company from external parties, and illustrates the increase in applications year-over-year from 2024 to 2025.

Witness: Jennifer M Partlan

Date: September 8, 2025

CECo Response to AG-CE-0341

21870-AG-CE-0341
Attachment 1

2024		2025	
MONTH	Applications	MONTH	Applications
JAN	147	JAN	209
FEB	119	FEB	209
MARCH	107	MARCH	202
APRIL	121	APRIL	207
MAY	142	MAY	160
JUNE	179	JUNE	273
JULY	261	JULY	292
AUG	238	AUG	244
YTD TOTAL	1314	YTD TOTAL	1796

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Question:

60. Refer to Figure 35 on page 69 of Ms. Partlan's direct testimony on LVD Lines Reliability capex. Please:

- a. Expand the table to include the same information for each year 2021 to 2024 and forecasted for 2025-2027. Provide it in Excel.
- b. Explain why Zonal Health Improvements decline in the projected test year from the bridge period. Also, explain why the unit cost increases from \$123,380 in the bridge period to \$199,525 in the test year.
- c. Explain why it is reasonable for Voltage Conversions to increase from 44 projects in the bridge period to 283 in the projected test year. Provide the basis for this increase. Also, explain why the unit cost declines in the projected test year.
- d. Explain why it is reasonable for Underground Cable Renovations to more than double in the projected test year from the bridge period. Provide the basis for the increase.
- e. Explain why an additional loop in the projected test year increases the capex by \$4.7 million when the average unit cost in the bridge period is \$449,718.
- f. Explain why it is reasonable for Circuit Exit Projects to more than double in the projected test year from the bridge period. Provide the basis for the increase.
- g. Provide the basis and calculations in Excel showing how the ROW capex for the bridge period and test year were developed.

Response:

- a. Please refer to Attachment 1 to this discovery response.
- b. Please see the discussion in discovery response 21870-ST-CE-0082, which says, "(I)n the 2023 Reliability Roadmap, the Company was planning to ramp up to addressing 280 zones per year, and the Company's filing in Case No. U-21585 included the beginning of this ramp up. Per Case No. U-21585, that ramp up would have begun in earnest at the beginning of 2025. As discussed on page 54, lines 4 through 18, of my direct testimony, the Company subsequently adjusted that glidepath, but not until 2025 was already under way. The Company's adjustment, in response to increased forestry spending and in response to the Liberty audit, is discussed in greater detail in Company witness Kelly's testimony, particularly on page 37, line 10, through page 38, line 10. Note that as indicated on page 68 of Exhibit A-129 (MPK-19), 85 zones per year does not fully become the target until 2027." The unit cost increase from the bridge period to the test year is explained in large part by the fact that the test year contains far fewer fusing projects than the bridge period, as the Company has been winding down its initial efforts in installing fuses on the system. Fusing projects have a relatively low per-project cost, so if fewer of them are done then the overall unit cost for zonal health improvements increases.

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- c. The reason for ramping up voltage conversions, which causes the increase from the bridge period to the test year, is explained in detail in Exhibit A-129 (MPK-19), pages 54 through 56. This work is necessary primarily to mitigate the safety risk of ungrounded wires, while also increasing operational flexibility through greater load transfer capability and improving the Company's inventory process. Unit costs are falling in the test year because, as the Company ramps up this work, it expects to realize economies of scale. Additionally, much of the planned work targets 11 kV Delta circuits, which are primarily located in rural regions, meaning they require fewer transformers and therefore have a lower cost.
- d. The reason for ramping up underground cable rejuvenation, which causes the increase from the bridge period to the test year, is explained in detail in Exhibit A-129 (MPK-19), pages 75 through 77. It is notable that Liberty Consulting Group's audit of the Company's system concluded that the Company's approach to underground cable rejuvenation "reflects a sound means for addressing vintage underground cable reliability problems." See "Final Report Utility Distribution Audit of Consumers Energy, Part Two," pages 69-70, filed by Liberty Consulting Group in Case No. U-21305 on September 23, 2024.
- e. Figure 35 on page 69 contains incorrect summary dollar and numbers for ATR loops. The correct numbers, which should have been used in this table, should be derived from Exhibit A-166 (JMP-1), page 14, and Exhibit A-167 (JMP-2), page 10. All other numbers in Figure 35 are correct as filed. An updated and corrected version of Figure 35 is provided below. With these corrected numbers, the bridge period and test unit costs are comparable with each other.

FIGURE 35
LVD LINES RELIABILITY INVESTMENT CATEGORY EXPENDITURES AND UNITS

Investment Categories	Bridge Period Capital	Bridge Period # of Units	Test Year Capital	Test Year # of Units
Targeted Circuit Improvement <i>strategies:</i>				
• Zonal Health Improvements	\$61,320,000	497*	\$34,917,000	175*
• Secondary	\$19,680,000	66	\$14,670,000	49
• Voltage Conversions	\$8,427,000	44	\$33,115,000	283
Underground Cable Rejuvenation	\$27,909,000	68	\$65,989,000	158
ATR Loops	\$25,616,000	59	\$15,412,000	33
Pole Replacements	\$29,711,000	3,076	\$127,500,000	12,500
Circuit Exit Projects	\$1,911,000	84	\$3,616,000	197
Right-of-way	\$6,188,000		\$17,667,000	
Total	\$180,763,000		\$312,886,000	

*Units for Zonal Health Improvements represent total number of projects; individual projects have varying types of units as shown in Exhibits A-166 (JMP-1) and A-167 (JMP-2).

- f. As the Company works to continually improve safety, it plans to increase the amount of circuit exit work completed in order to install additional isolation points on the system.
- g. Please refer to discovery response 21870-ST-CE-0155.

Witness: Jennifer M Partlan
Date: September 10, 2025

U21870-ST-CE-0155

Page 1 of 1

Question:

2. Please provide further detail on the Right of Way investment category within the LVD Lines Reliability Program. Provide individual projects and their associated number of line miles and projected costs.

Response:

There are no individual projects within the Right of Way investment category. Please refer to page 66 line 15 through page 67 line 8 for how the Company develops the costs for the Right of Way investment category. From 2020 through 2024, actual Right of Way costs as a percentage of Targeted Circuit Improvement investments, the investments to which Right of Way costs are particularly correlated, has averaged 14% with a minimum of 11% and a maximum of 19%. The Company expects this percentage to be approximately 12% in the test year.

Witness: Jennifer M Partlan

Date: August 1, 2025

U21870-AG-CE-0431
Page 1 of 2

Question:

112. Refer to lines 18-23 on page 64-66 of Mr. Kelly's direct testimony on the undergrounding selection criteria. Please:

- a. Explain whether the Company is using the same undergrounding project selection criteria that it proposed in Case No. U-21585 or if it revised that criteria to include a present value economic analysis to determine that each project is the least cost option. If yes, explain how. If no, explain why not.
- b. What are the right locations?
- c. By minimizing or not using directional drilling, does it mean the Company will need to tear through streets, driveways, lawns, and other obstacles causing more negative reactions from customers?
- d. By competitive cost, do you mean potentially higher cost than other alternatives?
- e. Provide the calculations and source information showing how the \$400,000 cost per undergrounding mile was determined. Explained what you mean "at scale" and how you achieve scale with each individual project.
- f. Explain how the \$974,000 and \$626,000 cost per mile were determined and provide the underlying calculations in Excel with source information and assumptions clearly explained.
- g. Explain the difference between Figures 24 and 25 and Figures 26 and 27. If they are the same, why were they repeated?

Response:

- a. The Company has updated the project selection criteria as discussed in Company Witness Partlan's testimony on Page 99, line 17 through Page 100, line 2. The Company did not update the economic analysis because the costs were determined in alignment with the \$400k/mile.
- b. The right locations are those that meet the Company's selection criteria as described in Company Witness Partlan's testimony on Page 98, line 15 through Page 99, line 16.
- c. No. The Company will select areas that will require less directional drilling and projects will be designed to minimize these crossings as much as possible. Road crossings will still be directionally drilled. Plowing is conducted in a minimally invasive manner on customer properties,
- d. Meaning comparable to the alternatives based on industry standard costs tests as shown in Figures 26 and 27 of my testimony.
- e. The installed costs and associated calculations are included in Attachment 1. As described in my testimony on Page 64, lines 18-22, at scale cost will leverage lessons learned to avoid projects such as that conducted in Saugatuck-Douglas to achieve a cost similar to the pilot portfolio excluding that project.

U21870-AG-CE-0431

Page 2 of 2

- f. The costs per mile of \$974,000 and \$626,000 were developed for Case U-21122 with a discussion of the costs included on Pages 119 and 120 of the Consumers Energy Company's Report in Response to August 2021 Catastrophic Storms dated October 21, 2021. See Attachment 2 for the calculations with the \$626,000 as the average of the maximum and minimum costs.
- g. Figure 24 conveys a PVRR of the pilot results based on the Utility Cost Test. Figure 25 conveys the PVRR of the pilot results when including Societal Costs. Figure 26 conveys PVRR of a scaled program based on the Utility Cost Test. Figure 27 conveys PVRR of a scaled program when including Societal Costs.

Witness: Michael P. Kelly

Date: September 10, 2025

CECo Response to AG-CE-0431

21870-AG-CE-0431				
Attachment 1				
Project Costs per mile of Underground Installed				
	Project	UG Miles	Total Cost	Cost / Mile
	Hager Park-Wellington	0.58	186,357	321,306
	Duquite-Saganing	1.77	715,821	404,419
	Pigeon Lake-Olive	1.20	272,102	226,752
	Saugatuck-Douglas	0.81	541,142	668,076
	Carleton Road-Beck Road	1.08	553,331	512,343
	Conklin Park-Holly	1.28	185,378	144,827
	Honor-Indian Hill	1.49	716,506	480,876
	Geneseville-Rogers	1.03	728,461	707,244
	Total	9.24	3,899,098	421,980
Costs at Scale on Underground Installed				
	Project	OH Miles	Total Cost	Cost / Mile
	Hager Park-Wellington	0.58	186,357	321,306
	Duquite-Saganing	1.77	715,821	404,419
	Pigeon Lake-Olive	1.20	272,102	226,752
	No Saugatuck-Douglas			
	Carleton Road-Beck Road	1.08	553,331	512,343
	Conklin Park-Holly	1.28	185,378	144,827
	Honor-Indian Hill	1.49	716,506	480,876
	Geneseville-Rogers	1.03	728,461	707,244
	Total	8.43	3,357,956	398,334

CECo Response to AG-CE-0431

21870-AG-CE-0431										
Attachment 2										
Page 2 of 3										
Itemized Project Summary										
Project Name:										
							Labor	\$ 179,000.00		
PROJECT TOTAL	\$ 277,418.00	Loaded	Hours	564.547173			Material	\$ 98,000.00		
Comments:								Total	\$ 277,000.00	
Generic					COST	Category				
Underground (INST/RP) - Feet										
				0						
1-2/C-1/0 AL 25KV PRIMARY	CU710001	Install	5280	\$ 33,355.44	Material					
BORE DIRECTIONAL 2 INCH HOLE (FT)	CU200632	Install	5280	\$ 69,907.20	Labor					
LABOR TO TRENCH W/TRENCHER TO 48" (FT)	CU402143	Install	0	\$ -	Labor					
LABOR FOR FIXED TIME ADDER	CU100417	Install	2	\$ 420.00	Labor					
LABOR FOR HOTSITE ADDER	CU106268	Install	1	\$ 90.00	Labor					
Itemized Components										
1P DE W/ 40'3, S8FGDE, 11K G	CU500115	Remove	2	\$ 2,516.00	Labor					
1P PTP W/ 40'3 G	CU500155	Remove	15	\$ 8,250.00	Labor					
1-4 ACSR	CU713011	Remove	1.2	\$ 7,915.24	Labor					
1-4 ACSR	CU713011	Remove	1.2	\$ 7,915.24	Labor					
1-1/0 TX OH SERVICE	CU710034	Remove	1600	\$ 1,888.00	Labor					
LABOR FOR FIXED TIME ADDER	CU100417	Install	45	\$ 9,450.00	Labor					
LABOR FOR HOTSITE ADDER	CU106268	Install	23	\$ 2,070.00	Labor					
LABOR TO HYDRO VACUUM (FOR OH/UG APPL)	CU201855	Install	2	\$ 394.00	Labor					
LABOR FOR SWITCH OPERATION (PER LOC)	CU101218	Install	3	\$ 810.00	Labor					
T 1-25 KVA 1-BUSH W/LCOM V=5G	CU501083	Remove	10	\$ 7,560.00	Labor					
30A	CU100362	Remove	1	\$ 38.00	Labor					
40A	CU100363	Install	1	\$ 38.00	Material					
CO 100A POLYMER 15KV V=2,5,7ST=B	CU100333	Remove	1	\$ 76.00	Labor					
LABOR TO HAND DIG RANDOM TO 36"	CU101515	Install	10	\$ 380.00	Labor					
1-2/C-350 AL 25KV (RISER)	CU704005	Install	30	\$ 2,502.00	Material					
BORE DIRECTIONAL 3-4 INCH HOLE (FT)	CU200279	Install	800	\$ 19,672.00	Labor					
LABOR TO TRENCH W/TRENCHER TO 48" (FT)	CU402143	Install	800	\$ 4,024.80	Labor					
3/C-1/0 AL UG SECONDARY	CU710163	Install	1600	\$ 4,960.00	Material					
ELBOW TERM(LB) 2/C 2AL 15KV V=2,5,7ST=G	CU102122	Install	10	\$ 2,300.00	Material					
DF SW FOR SINGLE PH V=2,5,7,12,14	CU513144	Install	2	\$ 4,986.00	Material					
TRF 25 KVA DF 1P 120/240V V=5 G	CU101931	Install	10	\$ 30,550.00	Material					
WOOD POLE 35'4	CU200054	Remove	12	\$ 5,664.00	Labor					
1PH RSR W/ LA, TIE, 100A CO V=2, 5 G	CU510628	Install	1	\$ 1,883.00	Material					
SPLPRI STRAIGHT 1/OAL 28KV JKT V=ALL	CU101832	Install	2	\$ 1,566.00	Material					
Print Screen Date:				9/29/2025 16:06						
					\$ 277,418.00					

CECo Response to AG-CE-0431

21870-AG-CE-0431						
Attachment 2						
Page 3 of 3						
Itemized Project Summary						\$ 974,000.00
Project Name:						
	Loaded			Labor	\$ 390,000.00	
PROJECT TOTAL	\$ 1,041,764.00	Hours	1568.290545	Material	\$ 584,000.00	
Comments:				Total	\$ 974,000.00	
Generic						
Underground (INST/RP) - Feet				COST	Cost/Mile	Category
			0			
3-2/C-750 AL 25KV PRIMARY	CU902001	Install	2701.6	\$ 95,580.93	\$ 107,193.57	Material
BORE DIRECTIONAL 6 INCH HOLE (FT)	CU200633	Install	2701.6	\$ 81,750.42	\$ 91,682.71	Labor
LABOR TO TRENCH W/TRENCHER TO 48" (FT)	CU402143	Install	0	\$ -	\$ -	
LABOR FOR FIXED TIME ADDER	CU100417	Install	2	\$ 420.00	\$ 471.03	Labor
LABOR FOR HOTSITE ADDER	CU106268	Install	1	\$ 90.00	\$ 100.93	Labor
Underground (INST/RP) - Feet						
			0		\$ -	
3-2/C-750 AL 25KV PRIMARY	CU902001	Install	4052.4	\$ 143,371.40	\$ 160,790.35	Material
		Install	0	\$ -	\$ -	
LABOR TO TRENCH W/TRENCHER TO 48" (FT)	CU402143	Install	4052.4	\$ 19,937.81	\$ 22,360.16	Labor
LABOR FOR FIXED TIME ADDER	CU100417	Install	1	\$ -	\$ -	
LABOR FOR HOTSITE ADDER	CU106268	Install	1	\$ 90.00	\$ 100.93	Labor
Itemized Components						
3P TAN W/ 40'2, S8S, PINS B	CU517207	Remove	24	\$ 19,824.00	\$ 22,232.52	Labor
3P TAN W/ 40'2, D8S, PINS B	CU503220	Remove	1	\$ 1,140.00	\$ 1,278.50	Labor
1P TAN W/ 40'3, S8S, PINS B	CU500309	Remove	13	\$ 10,218.00	\$ 11,459.44	Labor
3P TAN W/ 40'2, D8S, PINS B	CU503220	Install	4	\$ 9,044.00	\$ 10,142.80	Material
3-1/0 ACSR	CU910011	Remove	1.279166667	\$ 8,437.43	\$ 9,462.54	Labor
1-1/0 ACSR	CU710011	Remove	1.279166667	\$ 8,437.43	\$ 9,462.54	Labor
LABOR FOR FIXED TIME ADDER	CU100417	Install	84	\$ 17,640.00	\$ 19,783.18	Labor
LABOR FOR HOTSITE ADDER	CU106268	Install	42	\$ 3,780.00	\$ 4,239.25	Labor
T 1-25 KVA 1-BUSH W/LCOM V=5G	CU501083	Remove	6	\$ 4,536.00	\$ 5,087.10	Labor
T 1-50 KVA 1-BUSH W/LCOM V=5 G	CU500921	Remove	1	\$ 870.00	\$ 975.70	Labor
T 1-100 KVA 2-BUSH W/LCOM O/GRD V=5 G	CU500724	Remove	15	\$ 10,785.00	\$ 12,095.33	Labor
CO 200A POLYMER 15KV V=2,5,7ST=B	CU100330	Remove	6	\$ 228.00	\$ 255.70	Labor
3/C-1/0 AL UG SECONDARY	CU710163	Install	6400	\$ 19,840.00	\$ 22,250.47	Material
BORE DIRECTIONAL 3-4 INCH HOLE (FT)	CU200279	Install	6400	\$ 157,376.00	\$ 176,496.45	Labor
DF SW FOR THREE PHASE V=2,5,7,12,14	CU513146	Install	8	\$ 40,744.00	\$ 45,694.21	Material
FUSE RFL SM-4 200 A15KV V=2,5,7B	CU101693	Install	18	\$ 5,382.00	\$ 6,035.89	Material
TRF 25 KVA DF 1P 120/240V V=5 G	CU101931	Install	6	\$ 18,330.00	\$ 20,557.01	Material
TRF 50 KVA DF 1P 120/240V V=5 G	CU101922	Install	1	\$ 3,790.00	\$ 4,250.47	Material
TRF 300 KVA DF 3P 120/208V V=5 G	CU101991	Install	1	\$ 16,987.00	\$ 19,050.84	Material
150 KVA DF 3P 277/480 FT V=5 G	CU511958	Install	4	\$ 60,840.00	\$ 68,231.78	Material
TRF 75 KVA DF 3P 120/208V V=5 G	CU102002	Install	1	\$ 8,740.00	\$ 9,801.87	Material
3PH RSR W/ LA, TIE, 200A CO V=2, 5 B	CU511921	Install	8	\$ 41,104.00	\$ 46,097.94	Material
3PH RSR W/ LA, TIE, 200A CO V=2, 5 B	CU511921	Remove	2	\$ 2,270.00	\$ 2,545.79	Labor
PRI TERM 750AL 28KV W/2 HOLE LUG V=ALL B	CU102135	Install	42	\$ 45,528.00	\$ 51,059.44	Material
PRI TERM 1/0AL 28KV W/1 HOLE LUG V=ALL B	CU102117	Install	21	\$ 11,025.00	\$ 12,364.49	Material
Print Screen Date:	9/29/2025 16:06					
				\$ 1,041,763.69	\$ 973,610.93	

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Page 1 of 1

Question:

77. Refer to Exhibit A-167 (JMP-2) on LVD capex projects for the projected test year. Please:

- a. Line 11 on page 1 shows \$1,423,000 for either 100 pole replacement projects or 1,185. Explain which is the correct number. At 100, the cost per pole replacement is \$14,230 and for 1,185 replacements the cost per pole is \$1,201. Explain the reason for difference between either of these two cases versus the cost of \$2,418 per pole from the bridge period.
- b. Pages 6, 21, and 22 have projects with a cost of \$2 million or greater. For each of those projects, please identify the current phase of the project (i.e.: conceptual scoping, preliminary design, engineering design completed, project bid out or in bidding process, construction completed, etc.)

Response:

- a. Please refer to discovery response 21870-AG-CE-0362c for a discussion of what the numbers in the LVD underbuild projects represent. Exhibit A-167 (JMP-2), page 1, line 11 refers to LVD underbuild work that will be triggered by HVD pole replacements in the test year. The Company is projecting test year LVD underbuild work associated with 1,185 HVD pole replacement projects. This does not refer to LVD pole replacements. The 1185 value is the correct number of poles forecasted for the test period. The '100' should be disregarded.
- b. Please refer to Attachment 1 to this discovery response. The line items for underground cable rejuvenation, right of way, and pole replacements represent aggregate amounts of work rather than individual discrete projects.

Witness: Jennifer M Partlan
Date: September 9, 2025

CECo Response to AG-CE-0363

MICHIGAN PUBLIC SERVICE COMMISSION										Case No.:	U-21870
Consumers Energy Company										Exhibit No.:	A-167 (JMP-2)
Test Year LVD Project List										Page:	22 of 28
For the Test Year 12 Months Ending April 30, 2027										Witness:	JMPartlan
(\$000)										Date:	June 2025
Line	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)		
No.	Sub-Program	Project Description, Line, Substation, or Location	Projected Period Spending	Units	Unit Type	Investment Category	Location	Benefit Type	Benefit	Status	
Vulnerable Communities											
1	Resiliency	HARRIET_HARRIET TO MILBOURNE_DUPONT	2,200	2.2	miles	Resiliency - MIEJ Hardening	Genesee	Customer-outage-minutes avoided	201,006	Subbed to Western Ave Barclay	
2		EASTWOOD_TEXEL TO AMPERSEE_BORGESS	2,300	2.3	miles	Resiliency - MIEJ Hardening	Kalamazoo	Customer-outage-minutes avoided	299,815	Subbed to Comstock Shields	
3		MOSEL_ALLEN TO RAVINE_PATTERSON	2,300	2.3	miles	Resiliency - MIEJ Hardening	Kalamazoo	Customer-outage-minutes avoided	270,203	Scoping Completed, Released to Design, Material Orders Created	
4		DEWEY_SEATING TO WEALTHY_ST_NORTHWEST	2,300	2.3	miles	Resiliency - MIEJ Hardening	Kent Co.	Customer-outage-minutes avoided	632,017	Scoping Completed, Released to Design, Material Orders Created	
5		HASKELITE_3 MILE TO FOURMILE_WALKENT	3,000	3.0	miles	Resiliency - MIEJ Hardening	Kent Co.	Customer-outage-minutes avoided	487,640	Scoping Completed, Released to Design, Material Orders Created	
6		WEALTHY_ST_BUTTERWORTH TO MAYNARD_BESTWA	3,300	3.3	miles	Resiliency - MIEJ Hardening	Kent Co.	Customer-outage-minutes avoided	79,265	Scoping Completed, Released to Design, Material Orders Created	
7		EAST MUSKEGON_Q.LINE ROAD TO GETTY_MARQ.	2,000	2.8	miles	Resiliency - MIEJ Hardening	Muskegon Co.	Customer-outage-minutes avoided	255,841	Scoping Completed, Released to Design, Material Orders Created	
8		MAPLE GROVE_SUMMITAVE TO MUSK.H_HEIGHTS	2,140	2.6	miles	Resiliency - MIEJ Hardening	Muskegon Co.	Customer-outage-minutes avoided	187,951	Scoping Completed, Released to Design, Material Orders Created	
9		MONA LAKE_AIRPORT TO BROADWAY_PHILLIP	2,900	3.3	miles	Resiliency - MIEJ Hardening	Muskegon Co.	Customer-outage-minutes avoided	167,799	Scoping Completed, Released to Design, Material Orders Created	
10		COLLEGE PARK_MADISON TO CADMUS_WINTER	1,600	1.8	miles	Resiliency - MIEJ Hardening	Lenawee	Customer-outage-minutes avoided	1,649,932	Scoping Completed, Released to Design, Material Orders Created	
11		LIBERTY_LIBERTY TO GOGUAC_LAKEVIEW	2,000	2.2	miles	Resiliency - MIEJ Hardening	Calhoun	Customer-outage-minutes avoided	160,153	Scoping Completed, Released to Design, Material Orders Created	
12		MAUMEE_MAPLE ST TO COLLEGE PARK_RIVERSIDE	1,500	1.9	miles	Resiliency - MIEJ Hardening	Lenawee	Customer-outage-minutes avoided	483,186	Scoping Completed, Released to Design, Material Orders Created	
13		ROBERTS ST_LEROY STREET TO OAK ST_STATE	2,460	2.1	miles	Resiliency - MIEJ Hardening	Jackson	Customer-outage-minutes avoided	211,673	Scoping Completed, Released to Design, Material Orders Created	
14		Vulnerable Communities Total	30,000								
Substititons											
		COMSTOCK SHEILDS TO RIDGEVIEW MORROW	2,300	3.1	miles	Resiliency - MIEJ Hardening	Kalamazoo	Customer-outage-minutes avoided	744,734	Scoping Underway	
		WESTERN AVE BARCLAY TO WESTERN AVE DIVISION	2,100	2.0	miles	Resiliency - MIEJ Hardening	Muskegon	Customer-outage-minutes avoided	366,981	Scoping Underway	

CECo Response to AG-CE-0363

MICHIGAN PUBLIC SERVICE COMMISSION										Case No.:	U-21870
Consumers Energy Company										Exhibit No.:	A-167 (JMP-2)
Test Year LVD Project List										Page:	21 of 28
For the Test Year 12 Months Ending April 30, 2027										Witness:	JMPartlan
(\$000)										Date:	June 2025
Line	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)		
No.	Sub-Program	Project Description, Line, Substation, or Location	Projected Period Spending	Units	Unit Type	Investment Category	Location	Benefit Type	Benefit	STATUS	
	Reliability										
1	Resiliency	BASS LAKE/KISTLER/168	440	1.1	miles	Overhead to Underground	Mason Co.	Customer-outage-minutes avoided	49,426		
2		BLUE STAR/PIER COVE/622	480	1.2	miles	Overhead to Underground	Allegan Co.	Customer-outage-minutes avoided	35,686		
3		BUTTERFIELD/LINDEN/60	480	1.2	miles	Overhead to Underground	Newaygo Co.	Customer-outage-minutes avoided	25,080		
4		CONCORD/SWANS LAKE/581	400	1.0	miles	Overhead to Underground	Jackson Co.	Customer-outage-minutes avoided	28,866		
5		DEAN ROAD/HARTLAND/951	800	2.0	miles	Overhead to Underground	Livingston Co.	Customer-outage-minutes avoided	75,471		
6		ELEVENTH STREET/BASELINE/268	1,120	2.8	miles	Overhead to Underground	Kalamazoo Co.	Customer-outage-minutes avoided	53,410		
7		HALLS LAKE/HALLS LAKE/173	920	2.3	miles	Overhead to Underground	Calhoun Co.	Customer-outage-minutes avoided	61,463		
8		LAKE LEANN/LAKE LEANN/282	400	1.0	miles	Overhead to Underground	Jackson Co.	Customer-outage-minutes avoided	47,318		
9		MERSON/MERSON/412	800	2.0	miles	Overhead to Underground	Allegan Co.	Customer-outage-minutes avoided	64,148		
10		PECKROAD/M-91/473	840	2.1	miles	Overhead to Underground	Montcalm Co.	Customer-outage-minutes avoided	98,091		
11		PENINSULA/MAPLETON/124	440	1.1	miles	Overhead to Underground	Grand Traverse Co.	Customer-outage-minutes avoided	55,599		
12		SPRUCE ROAD/EASTBAY/693	200	0.5	miles	Overhead to Underground	Alcona Co.	Customer-outage-minutes avoided	51,908		
13		SPRUCE ROAD/EASTBAY/868	280	0.7	miles	Overhead to Underground	Alcona Co.	Customer-outage-minutes avoided	37,643		
14		YORKVILLE/HIGHLAND PARK/182	440	1.1	miles	Overhead to Underground	Kalamazoo Co.	Customer-outage-minutes avoided	47,581		
15		BALCOM/BANKERS/736	600	1.5	miles	Overhead to Underground	Hillsdale Co.	Customer-outage-minutes avoided	30,819		
16		BLACKMAN/SANDSTONE/404	1,080	2.7	miles	Overhead to Underground	Jackson Co.	Customer-outage-minutes avoided	181,206		
17		KOLASSA/MATTESON/187	320	0.8	miles	Overhead to Underground	Branch Co.	Customer-outage-minutes avoided	47,956		
18		TRUFANT/GOWEN/847	440	1.1	miles	Overhead to Underground	Kent Co.	Customer-outage-minutes avoided	64,962		
19		CASCO/HAWKHEAD/516	280	0.7	miles	Overhead to Underground	Allegan Co.	Customer-outage-minutes avoided	22,005		
20		HANOVER/PULASKI/532	1,680	4.2	miles	Overhead to Underground	Jackson Co.	Customer-outage-minutes avoided	117,839		
21		LAKE LEANN/LAKE LEANN/159	480	1.2	miles	Overhead to Underground	Hillsdale Co.	Customer-outage-minutes avoided	49,381		
22		WHITTEMORE/SAND LAKE/28	360	0.9	miles	Overhead to Underground	Iosco Co.	Customer-outage-minutes avoided	436,554		
23		ALGER/SKIDWAY/606	600	1.5	miles	Overhead to Underground	Ogemaw Co.	Customer-outage-minutes avoided	61,365		
24		ALGER/SKIDWAY/819	320	0.8	miles	Overhead to Underground	Ogemaw Co.	Customer-outage-minutes avoided	35,483		
25		BRICKER/STOREY ROAD/228	2,040	5.1	miles	Overhead to Underground	Kent Co.	Customer-outage-minutes avoided	86,953	Scoping underway	
26		HARVARD LAKE/HARVARD LAKE/986	2,120	5.3	miles	Overhead to Underground	Kent Co.	Customer-outage-minutes avoided	92,753	Scoping complete, moving to Engineering design	
27		SHERMAN/SHERMAN/304	1,480	3.7	miles	Overhead to Underground	Iosco Co.	Customer-outage-minutes avoided	50,822		
28		BROOKLYN/BROOKLYN/811	160	0.4	miles	Overhead to Underground	Jackson Co.	Customer-outage-minutes avoided	30,448		
29		BENNINGTON	2,483	1	Project	Resiliency - Fractionalization	Shiawassee Co.	Customer-outage-minutes avoided	76,750	Engineering Design Underway	
30		EAGLE	4,668	0	Project	Resiliency - Fractionalization	Ottawa Co.	Customer-outage-minutes avoided		Engineering Design Underway	
31		MOBILE 27	4,496	1	Project	Resiliency - Fractionalization	Statewide	Customer-outage-minutes avoided		Bid awarded, contract being finalized	
32		EGLE GRANT - Undergrounding Services - Grand Rapids	1,310	3	Projects	Undergrounding of Services and Secondary Improvements in DACs	Grand Rapids	Improved MIEJ Reliability; Customers	54		
33		EGLE GRANT - Undergrounding Services - Flint	1,259	2	Projects	Undergrounding of Services and Secondary Improvements in DACs	Flint	Improved MIEJ Reliability; Customers	53		
34		EGLE GRANT - Undergrounding Services - Kalamazoo	1,549	4	Projects	Undergrounding of Services and Secondary Improvements in DACs	Kalamazoo	Improved MIEJ Reliability; Customers	72		
35		Resiliency Total	35,765								

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Page 1 of 1

Question:

71. Refer to page 110 and Figure 52 on page 111 of Ms. Partlan's direct testimony on overloaded circuits. Please:

- a. Does the Company plan to address all overloaded circuits beginning in the projected test year or only those that are high-risk at over 140% overload?
- b. Provide the number of circuits in each category of overloading and the number of each type addressed in the bridge period and projected test year separately with the related capital expenditures. Provide this information in Excel.

Response:

- a. The Company plans to address circuits across all overload percentages during the bridge period as well as the test period. Different types of devices face different severity of risk at different percentage overload levels. For instance, an isolator or span of conductor overloaded past 100% will inevitably fail, where a fuse overloaded over 120% may take some time before failure.
- b. Please refer to Attachment 1 to this discovery response.

Witness: Jennifer M Partlan

Date: September 8, 2025

CECo Response to AG-CE-0357

21870-AG-CE-0357									
Attachment 1									
Bridge Year									
<u>Overload Percentage</u>	Circuit Count	Project Spend (in thousands)	Conductor	Fuse	Recloser	Regulator	Switch	Isolator	System
119% or less	23	2,289		7	1	1		18	
Between 120-139%	18	3,086		8				10	
Over 140%	83	15,989		61	13	6	3	28	
Substation triggered	4	7,216							4
Test Year									
<u>Overload Percentage</u>	Circuit Count	Project Spend (in thousands)	Conductor	Fuse	Recloser	Regulator	Switch	Isolator	System
119% or less	111	30,658	18	44	21	19	6	34	
Between 120-139%	44	10,253		21	10	5	1	14	
Over 140%	85	11,527		53	10	6	2	14	
Substation triggered	3	2,474							3

U21870-AG-CE-0361

Page 1 of 2

Question:

75. Refer to Figure 65 on page 138 of Ms. Partlan’s direct testimony on LVD Transformers. Please:

- a. Provide the information in the table underneath the graph in Excel.
- b. Provide the basis for the increase in the number of units in 2025-2027 over 2024 for each type of transformer.
- c. Provide the unit cost of each of the five types of transformers for each year 2020 to 2027 in Excel.
- d. Explain what caused unit cost increases for each type of transformer in 2024 over 2023 and what steps the Company took to avoid or minimize those increases.
- e. Explain the basis for forecasted unit cost increases in 2025, 2026, and 2027 over the 2024 unit cost for each type of transformer.

Response:

- a. Please refer to Attachment 1, page 1, of this response. The numbers in Figure 65 in my direct testimony undercounted the total amount of 3-phase padmount transformers and of regulators in 2020. The numbers in Attachment 1 are corrected.
- b. The Company’s unit projections are based on three components: historical average usage, known material requirements for upcoming projects, and a reasonable level of turnover of emergency stock. The Company’s purchase quantity is based on the sum of these three components for each year. The Company’s equation is as follows:

$$\begin{aligned} & (\text{Inventory on hand} + \text{quantity on order through YE}) - \text{Emergency Stock} \\ & \quad - \text{Expected usage through YE} - \text{Forecasted demand} = \text{Purchase quantity} \end{aligned}$$

- c. Please refer to Attachment 1, page 2, of this response, for actual unit costs by transformer type from 2020 through 2025 YTD, and forecasted 2026 and 2027 unit costs.
- d. Issues related to rising unit costs are addressed on page 139, line 1, through page 140, line 10, of my direct testimony. Unit costs have increased due to a combination of inflation and ongoing material and labor shortages, which have significantly reduced the domestic supply base and driven industry-wide price hikes. In response to these supply chain challenges, the Company implemented a supply base diversification strategy, including the onboarding of new overseas manufacturers. While this approach helped mitigate sourcing risks, it also introduced higher transportation and manufacturing costs, contributing to elevated unit costs in 2024—particularly for products requiring international shipping. To maintain competitive pricing, the Company has secured multiple sources of supply for each transformer and executed long-term contracts with price escalation ceilings. Additionally, by leveraging detailed demand planning, the Company is optimizing order quantities to minimize surplus and reduce unnecessary spending. As tariff pressures and supplier pricing adjustments persist, the

U21870-AG-CE-0361

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Company is actively using market data on raw materials to negotiate and push back against unjustified cost increases.

- e. Unit costs are generally projected to increase by approximately 5% year-over-year, primarily driven by inflation. Additionally, the Company maintains an inventory of over 400 transformer types, and annual unit costs can fluctuate based on the mix of products purchased. In the coming years, the Company plans to increase purchases of higher-cost units, such as padmount transformers, while reducing the volume of lower-cost units. This shift in product mix is expected to raise the average overall cost of transformers.

Witness: Jennifer M Partlan

Date: September 9, 2025

CECo Response to AG-CE-0361

21870-AG-CE-0361								
Attachment 1								
Page 1 of 2								
Transformer Type	2020	2021	2022	2023	2024	2025	2026	2027
1-phase pad	1,798	1,318	1,559	2,311	2,876	4,690	6,267	7,469
3-phase pad	627	490	426	427	564	927	741	1,189
Isolator	96	73	183	174	221	183	163	154
Regulator	404	929	690	245	447	620	534	375
Overhead	10,457	7,640	9,668	11,891	14,848	12,000	11,135	10,207
Total	15,402	12,471	14,548	17,071	20,980	20,445	20,866	21,421

21870-AG-CE-0361								
Attachment 1								
Page 2 of 2								
Transformer Type	2020	2021	2022	2023	2024	2025 YID	2026 Forecast	2027 Forecast
1-phase pad	\$ 1,727	\$ 1,768	\$ 2,535	\$ 3,747	\$ 4,009	\$ 5,287	\$ 5,551	\$ 5,829
3-phase pad	\$ 6,665	\$ 7,537	\$ 10,492	\$ 12,012	\$ 23,142	\$ 27,217	\$ 28,578	\$ 30,007
Isolator	\$ 5,342	\$ 5,596	\$ 9,797	\$ 13,953	\$ 14,744	\$ 13,748	\$ 14,435	\$ 15,157
Regulator	\$ 8,244	\$ 12,191	\$ 14,027	\$ 19,651	\$ 23,796	\$ 28,635	\$ 30,067	\$ 31,570
Overhead	\$ 928	\$ 1,232	\$ 1,446	\$ 1,731	\$ 2,854	\$ 2,522	\$ 2,648	\$ 2,781
Total	\$ 24,926	\$ 30,345	\$ 40,319	\$ 53,117	\$ 70,569	\$ 77,409	\$ 81,279	\$ 85,343

AG Calculation of Pad Mount Transformers Capex Adjustment

Source:21870-AG-CE-0361 Attachment 1 Page 1 of 2

Number of Units	Company Forecasted Increases												
	2020	2021	2022	2023	% Increase	2024	% Increase	2025	% Increase	2026	% Increase	2027	% Increase
Transformer Type	1,798	1,318	1,559	2,311	48%	2,876	24%	4,690	63%	6,267	34%	7,469	19%
1-phase pad	627	490	426	427	0%	564	32%	927	64%	741	-20%	1,189	60%
3-phase pad	96	73	183	174		221		183		163		154	
Isolator	404	929	690	245		447		620		534		375	
Regulator	10,457	7,640	9,668	11,891		14,848		12,000		11,135		10,207	
Overhead	15,402	12,471	14,548	17,071		20,980		20,445		20,866		21,421	
Total													
1-phase pad	AG Forecasted increase based on 2024 Increase Rate					2,876	24%	3,566		4,422		5,483	
3-phase pad	AG Forecasted increase based on 2024 Increase Rate*					564	32%	744		741		978	

* Except 2026 due to Company forecasted decline

AG Bridge Period Capex Forecast: (\$000)					AG Test Period Capex Forecast: (\$000)				
	Units		Unit Cost ¹	Cap Ex Forecast		Units		Unit Cost ¹	Cap Ex Forecast
1-phase pad	5,040	X	\$ 5,287	\$ 26,646	4,776	X	\$ 5,414	\$ 25,857	
3-phase pad	991	X	\$ 27,217	\$ 26,972	820	X	\$ 27,870	\$ 22,853	

Company Bridge Period Capex Forecast: (\$000)					Company Test Period Capex Forecast: (\$000)				
	Units		Unit Cost ¹	Cap Ex Forecast		Units		Unit Cost ¹	Cap Ex Forecast
1-phase pad	6,779	X	\$ 5,375	\$ 36,437	6,668	X	\$ 5,644	\$ 37,634	
3-phase pad	1,174	X	\$ 27,671	\$ 32,486	890	X	\$ 29,054	\$ 25,858	

Bridge Period Difference & Disallowance		Test Year Difference & Disallowance	
1-phase pad	\$ (9,791)		\$ (11,777)
3-phase pad	\$ (5,514)		\$ (3,005)

Note 1: AG Price for Bridge Period is August 2025 YTD price. Test year price from bridge period plus inflation
Company price for Bridge Period assumed to be August 2025 YTD price and 2026 price prorated. For Test year prices of 2023 & 2027 prorated.

U21870-AG-CE-0349

Page 1 of 1

Question:

63. Refer to Figure 39 on page 79 of Ms. Partlan's direct testimony on repetitive outages capex. Please:

- a. Expand the table under the graph to include the same information for each year 2025-2027 and provide it in Excel.
- b. Explain why capex for 2022 through 2024 declined from 2021.
- c. Explain why a four-fold increase in capex for the bridge period and a six-fold increase in the projected test year from 2024 actual capex is reasonable.

Response:

- a. Please see Attachment 1 to this response.
- b. Please refer to page 80, line 3, through page 81, line 4, of my direct testimony, which explains the reasons for these year-over-year spending variations.
- c. As noted by Company witness Kelly on page 50 of his direct testimony, the Company's CEMI-4 performance does not currently meet the Commission's Service Quality and Reliability Standards, and as noted on page 45 of his direct testimony, the Company will be in the penalty range of the Commission's financial incentives and disincentives framework without additional investment in Repetitive Outages. Page 111, lines 11 through 15, and Figures 40 and 41 of Company witness Kelly's direct testimony illustrate the difference in projected CEMI-4 performance given current levels of Repetitive Outage funding versus levels of funding proposed in the instant case. The Company believes it is reasonable to invest at a level required to meet Commission standards. As illustrated in Attachment 1, the Company plans a ramp-up of investment through 2026 to quickly address CEMI-4, followed by a reduction in investment from 2026 levels in 2027.

Witness: Jennifer M Partlan

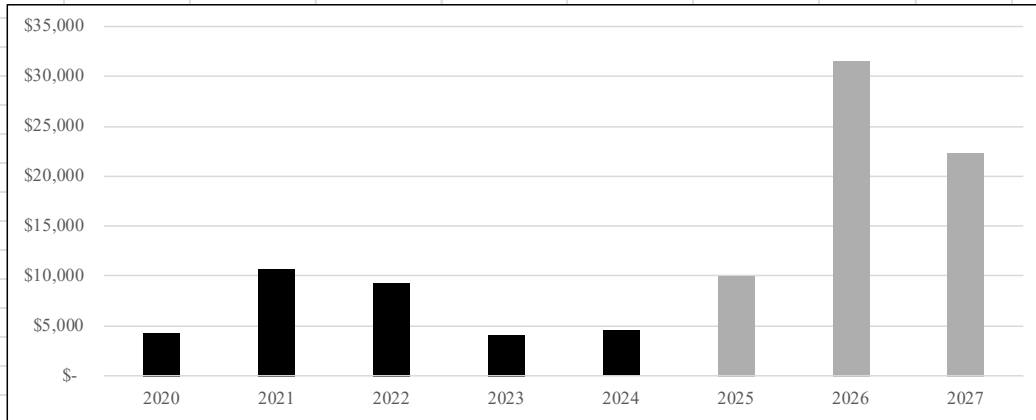
Date: September 8, 2025

CECo Response to AG-CE-0349

21870-AG-CE-0349

LVD REPETITIVE OUTAGES SUBPROGRAM EXPENDITURES

Attachment I



<\$1,000>	2020	2021	2022	2023	2024	2025	2026	2027
\$	4,350	\$ 10,714	\$ 9,254	\$ 4,082	\$ 4,491	\$ 10,011	\$ 31,500	\$ 22,300

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Page 1 of 1

Question:

62. Refer to Figure 38 on page 77 of Ms. Partlan's direct testimony on repetitive outages forecasted benefits. Please provide the customer outage minutes experienced in each year 2023 and 2024 on the same circuits.

Response:

Please refer to Attachment 1 to this response for the 2023 and 2024 outage minutes for bridge period projects, and to Attachment 2 for test year projects. In instances where 0 outage minutes are shown for both 2023 and 2024, the Company identified the project based on outage data from 2020-2022.

Witness: Jennifer M Partlan

Date: September 8, 2025

MICHIGAN PUBLIC SERVICE COMMISSION

Consumers Energy Company

Bridge Period LVD Project List

For the Bridge Period 16 Months Ending April 30, 2026

(\$000)

U21870-AG-CE-0348_Partlan_ATT_1

Case No.: U-21870

Exhibit No.: A-166 (JMP-1)

Page: 23 of 37

Witness: JMPartlan

Date: June 2025

Line	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	2023 Customer Outage Minutes	2024 Customer Outage Minutes	
No.	Sub-Program	Project Description, Line, Substation, or Location	Period Spending	Units	Unit Type	Investment Category	Location	Benefit Type	Benefit			
	Reliability											
1	LVD Repetitive Outage	RPOUT14 Pennfield/Pennfield LCP504	387	1	Project	Repetitive Outage Projects	PENNFIELD	Reduce Repeated Outages; Customer-outage-minutes avoided	6,138	0	0	
2	LVD Repetitive Outage	RPOUT KRAFT AVENUE ACQUEST LCP 734 UGL	78	1	Project	Repetitive Outage Projects	GRAND RAPIDS	Reduce Repeated Outages; Customer-outage-minutes avoided	6,208	0	0	
3	LVD Repetitive Outage	SYSP17 COTTAGE GROVE_PREVO LCP 998	45	1	Project	Repetitive Outage Projects	KAWKAWLIN	Reduce Repeated Outages; Customer-outage-minutes avoided	40,000	0	241296	
4	LVD Repetitive Outage	RPOUT18 BEAVERTON/ROSS LCP 325	110	1	Project	Repetitive Outage Projects	BEAVERTON	Reduce Repeated Outages; Customer-outage-minutes avoided	47,580	0	0	
5	LVD Repetitive Outage	SYSP ST CHARLES/FERGUS LCP 319 & 310	110	1	Project	Repetitive Outage Projects	ST CHARLES	Reduce Repeated Outages; Customer-outage-minutes avoided	692	597	0	
6	LVD Repetitive Outage	SYSP19 Midland_Commercial LCP 342	5	1	Project	Repetitive Outage Projects	MIDLAND	Reduce Repeated Outages; Customer-outage-minutes avoided	8,165	0	0	
7	LVD Repetitive Outage	SYSP19 Larkin_N Midland LCP 404	8	1	Project	Repetitive Outage Projects	MIDLAND	Reduce Repeated Outages; Customer-outage-minutes avoided	300	0	0	
8	LVD Repetitive Outage	RPOUT Renton - Watkins First Zone	13	1	Project	Repetitive Outage Projects	BATTLE CREEK	Reduce Repeated Outages; Customer-outage-minutes avoided	23,529	0	0	
9	LVD Repetitive Outage	RPOUT19Lovejoy Braden Steinacker Recl	45	1	Project	Repetitive Outage Projects	ARGENTINE	Reduce Repeated Outages; Customer-outage-minutes avoided	39,642	117906	82420	
10	LVD Repetitive Outage	RPOUT STANDALE_STANDALE LCP 356	52	1	Project	Repetitive Outage Projects	GRAND RAPIDS	Reduce Repeated Outages; Customer-outage-minutes avoided	40,176	0	0	
11	LVD Repetitive Outage	RPOUT HOPKINS MONTEREY LCP 900	30	1	Project	Repetitive Outage Projects	HOPKINS	Reduce Repeated Outages; Customer-outage-minutes avoided	24,900	0	0	
12	LVD Repetitive Outage	RPOUT ASH ROAD_STERLING RD	52	1	Project	Repetitive Outage Projects	LITCHFIELD	Reduce Repeated Outages; Customer-outage-minutes avoided	24,000	353029	3489	
13	LVD Repetitive Outage	SYSP MASON SOUTH ST. FUSE COORDINATION	49	1	Project	Repetitive Outage Projects	MASON	Reduce Repeated Outages; Customer-outage-minutes avoided	7,506	607168	0	
14	LVD Repetitive Outage	SYSP ALCONA DAM, GLENNIE	8	1	Project	Repetitive Outage Projects	CURTIS	Reduce Repeated Outages; Customer-outage-minutes avoided	85,620	0	487	
15	LVD Repetitive Outage	RPOUT NORGE MACHINE LINCOLN	19	1	Project	Repetitive Outage Projects	MUSKEGON	Reduce Repeated Outages; Customer-outage-minutes avoided	60	0	0	
16	LVD Repetitive Outage	RPOUT CEMI12 QUINCY_QUINCY OHL	154	1	Project	Repetitive Outage Projects	QUINCY	Reduce Repeated Outages; Customer-outage-minutes avoided	88,955	369428	0	
17	LVD Repetitive Outage	RPOUT MIDDLEVILLE_LAFAYETTE SUB	36	1	Project	Repetitive Outage Projects	MIDDLEVILLE	Reduce Repeated Outages; Customer-outage-minutes avoided	41,446	0	0	
18	LVD Repetitive Outage	RPOUT Ft Custer - Hill Brady LCP 254	90	1	Project	Repetitive Outage Projects	BATTLE CREEK	Reduce Repeated Outages; Customer-outage-minutes avoided	3,750	0	0	
19	LVD Repetitive Outage	RPOUT Bluewater-Colony LCP 173-Poles	160	1	Project	Repetitive Outage Projects	ST JOHNS	Reduce Repeated Outages; Customer-outage-minutes avoided	6,300	0	0	
20	LVD Repetitive Outage	RPOUT Dewitt-Geneva Lk LCP Sub	28	1	Project	Repetitive Outage Projects	DEWITT	Reduce Repeated Outages; Customer-outage-minutes avoided	152,340	0	0	
21	LVD Repetitive Outage	RPOUT HOMER_INDUSTRIAL LCP 685	19	1	Project	Repetitive Outage Projects	HOMER	Reduce Repeated Outages; Customer-outage-minutes avoided	310	0	0	
22	LVD Repetitive Outage	RPOUT Otisville/Irish Rd LCP 591	68	1	Project	Repetitive Outage Projects	OTISVILLE	Reduce Repeated Outages; Customer-outage-minutes avoided	70,837	58647	0	
23	LVD Repetitive Outage	RPOUT LOGISTIC FELCH LCP 837	161	1	Project	Repetitive Outage Projects	ZEELAND	Reduce Repeated Outages; Customer-outage-minutes avoided	23,968	7324	414050	
24	LVD Repetitive Outage	RPOUT BILMAR PEIRCE LCP 725	117	1	Project	Repetitive Outage Projects	BLENDON	Reduce Repeated Outages; Customer-outage-minutes avoided	12,770	0	0	
25	LVD Repetitive Outage	RPOUT Haskelite_3 Mile LCP 425	50	1	Project	Repetitive Outage Projects	GRAND RAPIDS	Reduce Repeated Outages; Customer-outage-minutes avoided	34,866	0	14327	
26	LVD Repetitive Outage	RPOUT Colon_Colon LCP 947	118	1	Project	Repetitive Outage Projects	COLON	Reduce Repeated Outages; Customer-outage-minutes avoided	76,392	0	0	
27	LVD Repetitive Outage	RPOUT WEST RIVER_GRAND RIVER LCP-737	5	1	Project	Repetitive Outage Projects	PLAINFIELD	Reduce Repeated Outages; Customer-outage-minutes avoided	3,858	0	3858	
28	LVD Repetitive Outage	RPOUT ROCKFORD_WOVERINE LCP-333	12	1	Project	Repetitive Outage Projects	ROCKFORD	Reduce Repeated Outages; Customer-outage-minutes avoided	107,757	461815	0	
29	LVD Repetitive Outage	RPOUT ST CHARLES/SAGINAW LCP 604	108	1	Project	Repetitive Outage Projects	ST CHARLES	Reduce Repeated Outages; Customer-outage-minutes avoided	21,393	26212	80223	
30	LVD Repetitive Outage	RPOUT Belding_City LCP 513 UG Tie Line	330	1	Project	Repetitive Outage Projects	BELDING	Reduce Repeated Outages; Customer-outage-minutes avoided	31,000	5519	85030	
31	LVD Repetitive Outage	RPOUT YORKVILLE_BAYVIEW LCP 144 ESIC OHL	270	1	Project	Repetitive Outage Projects	RICHLAND	Reduce Repeated Outages; Customer-outage-minutes avoided	106,272	19127	110723	
32	LVD Repetitive Outage	RPOUT Alder Creek - Lee Lake LCP 303	58	1	Project	Repetitive Outage Projects	UNION CITY	Reduce Repeated Outages; Customer-outage-minutes avoided	143,974	136326	0	
33	LVD Repetitive Outage	RPOUT 11435 40th Ave - Cable Fault UGL	137	1	Project	Repetitive Outage Projects	ALLENDALE	Reduce Repeated Outages; Customer-outage-minutes avoided	5,760	0	0	
34	LVD Repetitive Outage	RPOUT-PECK-ROAD_WISE-ROAD-LCP-0024	35	1	Project	Repetitive Outage Projects	GREENVILLE	Reduce Repeated Outages; Customer-outage-minutes avoided	52,800	0	0	
35	LVD Repetitive Outage	RPOUT BENTHEIM_140TH AVENUE LCP 117	33	1	Project	Repetitive Outage Projects	SALEM	Reduce Repeated Outages; Customer-outage-minutes avoided	54,493	29848	0	
36	LVD Repetitive Outage	RPOUT VIRGINIA PARK_CASTLE LCP CKT	42	1	Project	Repetitive Outage Projects	HOLLAND	Reduce Repeated Outages; Customer-outage-minutes avoided	295,323	0	0	
37	LVD Repetitive Outage	RPOUT MILLGROVE_ALGNHYDR LCP 378 PT 2	178	1	Project	Repetitive Outage Projects	ALLEGAN	Reduce Repeated Outages; Customer-outage-minutes avoided	152,091	0	0	
38	LVD Repetitive Outage	RPOUT DEAN ROAD-SHANNON LAKE LCP151	15	1	Project	Repetitive Outage Projects	ARGENTINE	Reduce Repeated Outages; Customer-outage-minutes avoided	594,270	907850	162768	
39	LVD Repetitive Outage	RPOUT BROADMOOR_NORTH LCP 306	41	1	Project	Repetitive Outage Projects	KENTWOOD	Reduce Repeated Outages; Customer-outage-minutes avoided	200	221	0	
40	LVD Repetitive Outage	RPOUT HASKELITE_ANN ST LCP 148 ATR RELOC	30	1	Project	Repetitive Outage Projects	GRAND RAPIDS	Reduce Repeated Outages; Customer-outage-minutes avoided	174,000	0	173854	
41	LVD Repetitive Outage	RPOUT N MUSKEGON STATE PARK LCP 38	139	1	Project	Repetitive Outage Projects	MUSKEGON	Reduce Repeated Outages; Customer-outage-minutes avoided	27,100	145371	0	
42	LVD Repetitive Outage	RPOUT KENTWOOD_PRINCETON LCP 0639	48	1	Project	Repetitive Outage Projects	KENTWOOD	Reduce Repeated Outages; Customer-outage-minutes avoided	9,215	3866	1627	
43	LVD Repetitive Outage	RPOUT MILL GROVE_ALLEGAN HYDRO LCP855	80	1	Project	Repetitive Outage Projects	ALLEGAN	Reduce Repeated Outages; Customer-outage-minutes avoided	4,664	1910	14449	
44	LVD Repetitive Outage	RPOUT WILLIAMS_CRESENT LCP 395	128	1	Project	Repetitive Outage Projects	ALLEGAN	Reduce Repeated Outages; Customer-outage-minutes avoided	156,784	20689	16819	
45	LVD Repetitive Outage	FAIL24READING-CAMBRIA-7510 READING RD-RE	34	1	Project	Repetitive Outage Projects	READING	Reduce Repeated Outages; Customer-outage-minutes avoided	692,254	2113567	0	
46	LVD Repetitive Outage	SYSP TALLMAN_WACOUSTA LCP 188	43	1	Project	Repetitive Outage Projects	WESTPHALIA	Reduce Repeated Outages; Customer-outage-minutes avoided	16,471	0	0	
47	LVD Repetitive Outage	SYSP WEST FENTON OVERPASS LCP#560 UG	76	1	Project	Repetitive Outage Projects	FENTON	Reduce Repeated Outages; Customer-outage-minutes avoided	279,720	0	0	
48	LVD Repetitive Outage	RPOUT AGNEW_WEYBURN LCP 368	16	1	Project	Repetitive Outage Projects	GRAND HAVEN	Reduce Repeated Outages; Customer-outage-minutes avoided	4,680	2450	2639	
49	LVD Repetitive Outage	RPOUT PIGEON LAKE_OLIVE LCP 531	7	1	Project	Repetitive Outage Projects	PARK	Reduce Repeated Outages; Customer-outage-minutes avoided	2,429	2810	6905	
50	LVD Repetitive Outage	RPOUT WILLIAMS_ELY LCP 375	87	1	Project	Repetitive Outage Projects	ALLEGAN	Reduce Repeated Outages; Customer-outage-minutes avoided	10,717	1096	31901	
		LVD Repetitive Outages Subtotal	3,962						3,813,675	5,392,776	1,446,865	

MICHIGAN PUBLIC SERVICE COMMISSION

Consumers Energy Company

Bridge Period LVD Project List

For the Bridge Period 16 Months Ending April 30, 2026

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U21870-AG-CE-0348_Partlan_ATT_1

Case No.: U-21870

Exhibit No.: A-166 (JMP-1)

Page: 24 of 37

Witness: JMPartlan

Date: June 2025

Line	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	2023 Customer Outage		2024 Customer Outage	
										Benefit	Minutes	Benefit	Minutes
Reliability													
1	LVD Repetitive Outage	RPOUT TAMARACK_AMBLE LCP 521	209	1	Project	Repetitive Outage Projects	LAKEVIEW	Reduce Repeated Outages; Customer-outage-minutes avoided	7,200		0		0
2	LVD Repetitive Outage	RPOUT NORTH LANSING_LABORATORY LCP 027	42	1	Project	Repetitive Outage Projects	LANSING	Reduce Repeated Outages; Customer-outage-minutes avoided	20,708		75613		7274
3	LVD Repetitive Outage	RPOUT TEXAS_EAGLE LAKE LCP SUB	75	1	Project	Repetitive Outage Projects	MATTAWAN	Reduce Repeated Outages; Customer-outage-minutes avoided	1,134,708		4863034		2108022
4	LVD Repetitive Outage	RPOUT LCP 472-40 LAKE LEANN_BUNDY HILL	64	1	Project	Repetitive Outage Projects	MOSCOW	Reduce Repeated Outages; Customer-outage-minutes avoided	17,130		34344		0
5	LVD Repetitive Outage	RPOUT GREENVILLE_WASHINGTON ST	212	1	Project	Repetitive Outage Projects	GREENVILLE	Reduce Repeated Outages; Customer-outage-minutes avoided	78,664		184948		110040
6	LVD Repetitive Outage	RPOUT TRUFANT_MASTON LAKE LCP 206	487	1	Project	Repetitive Outage Projects	MAPLE VALLEY	Reduce Repeated Outages; Customer-outage-minutes avoided	15,295		15650		43115
7	LVD Repetitive Outage	RPOUT MULLINS_ROYAL VISTA LCP 312	47	1	Project	Repetitive Outage Projects	WALKER	Reduce Repeated Outages; Customer-outage-minutes avoided	83,100		1352003		658874
8	LVD Repetitive Outage	RPOUT DIMONDALE_DIMONDALE LCP 878	19	1	Project	Repetitive Outage Projects	DIMONDALE	Reduce Repeated Outages; Customer-outage-minutes avoided	7,000		980		13062
9	LVD Repetitive Outage	RPOUT HOGSBACK_HOLT ROAD LCP SUB	7	1	Project	Repetitive Outage Projects	DELHI	Reduce Repeated Outages; Customer-outage-minutes avoided	66,811		0		268167
10	LVD Repetitive Outage	RPOUT PIGEON LAKE_OLIVE LCP 547	11	1	Project	Repetitive Outage Projects	PARK	Reduce Repeated Outages; Customer-outage-minutes avoided	5,339		7035		13600
11	LVD Repetitive Outage	RPOUT24 ROSEBUSH_STVNSON LK LCP 221	153	1	Project	Repetitive Outage Projects	ROSEBUSH	Reduce Repeated Outages; Customer-outage-minutes avoided	1,815		0		0
12	LVD Repetitive Outage	RPOUT24 Bullock Stewart LCP918	28	1	Project	Repetitive Outage Projects	LEE	Reduce Repeated Outages; Customer-outage-minutes avoided	12,556		41843		55090
13	LVD Repetitive Outage	RPOUT LEITH STREET_WESTERN ROAD LCP 519	53	1	Project	Repetitive Outage Projects	FLINT	Reduce Repeated Outages; Customer-outage-minutes avoided	2,735		0		27349
14	LVD Repetitive Outage	RPOUT TEXAS_EAGLE LAKE LCP 760	130	1	Project	Repetitive Outage Projects	MATTAWAN	Reduce Repeated Outages; Customer-outage-minutes avoided	16,807		27566		13501
15	LVD Repetitive Outage	RPOUT SUNFIELD_SUNFIELD LCP 0729	19	1	Project	Repetitive Outage Projects	SUNFIELD	Reduce Repeated Outages; Customer-outage-minutes avoided	5,000		11644		50193
16	LVD Repetitive Outage	RPOUT HARPER ROAD_ARENS LCP 363	50	1	Project	Repetitive Outage Projects	LANSING	Reduce Repeated Outages; Customer-outage-minutes avoided	58,680		0		0
17	LVD Repetitive Outage	RLBY DEAN ROAD_SHANNOON LAKE LCP 648	45	1	Project	Repetitive Outage Projects	HARTLAND	Reduce Repeated Outages; Customer-outage-minutes avoided	19,391		0		0
18	LVD Repetitive Outage	RPOUT WAYLAND_WAYLAND LCP 0684	5	1	Project	Repetitive Outage Projects	WAYLAND	Reduce Repeated Outages; Customer-outage-minutes avoided	178,994		41828		0
19	LVD Repetitive Outage	RPOUT TWIN LAKE_TWIN LAKE LCP 494	31	1	Project	Repetitive Outage Projects	HOLTON	Reduce Repeated Outages; Customer-outage-minutes avoided	30,000		0		639566
20	LVD Repetitive Outage	RPOUT MAPLE GROVE_SUMMIT AVENUE LCP 390	77	1	Project	Repetitive Outage Projects	MUSKEGON HTS	Reduce Repeated Outages; Customer-outage-minutes avoided	109,217		724954		198975
21	LVD Repetitive Outage	RPOUT DEWITT_DEWITT LCP 570	12	1	Project	Repetitive Outage Projects	DEWITT	Reduce Repeated Outages; Customer-outage-minutes avoided	10,000		0		0
22	LVD Repetitive Outage	RPOUT JUDD ROAD_OTTAWA LCP 284	46	1	Project	Repetitive Outage Projects	BURTON	Reduce Repeated Outages; Customer-outage-minutes avoided	2,939		0		0
23	LVD Repetitive Outage	RPOUT COMSTOCK_TUNIER LCP 891	100	1	Project	Repetitive Outage Projects	KALAMAZOO	Reduce Repeated Outages; Customer-outage-minutes avoided	2,494		3264		4612
24	LVD Repetitive Outage	RPOUT PICKEREL_INDIAN LAKE LCP 803	366	1	Project	Repetitive Outage Projects	PORTAGE	Reduce Repeated Outages; Customer-outage-minutes avoided	26,902		236		26931
25	LVD Repetitive Outage	RPOUT WHITTUM_ROYSTON LCP 279	98	1	Project	Repetitive Outage Projects	EATON RAPIDS	Reduce Repeated Outages; Customer-outage-minutes avoided	22,240		0		77418
26	LVD Repetitive Outage	RPOUT Knight_Rosemary LCP 602 ESIC OHL	8	1	Project	Repetitive Outage Projects	BAY CITY	Reduce Repeated Outages; Customer-outage-minutes avoided	81,453		287479		50351
27	LVD Repetitive Outage	RPOUT MIDDLEVILLE_BUSINESS LCP 0207	3	1	Project	Repetitive Outage Projects	MIDDLEVILLE	Reduce Repeated Outages; Customer-outage-minutes avoided	200		0		0
28	LVD Repetitive Outage	RPOUT ALAMO_Owen LCP Sub	5	1	Project	Repetitive Outage Projects	PINE GROVE	Reduce Repeated Outages; Customer-outage-minutes avoided	20,298		1485494		35013
29	LVD Repetitive Outage	RPOUT WARNER_BURCHETT LCP 454	191	1	Project	Repetitive Outage Projects	PRAIRIEVILLE	Reduce Repeated Outages; Customer-outage-minutes avoided	78,774		203830		23601
30	LVD Repetitive Outage	RPOUT ALAMO_PINE GROVE LCP 646	55	1	Project	Repetitive Outage Projects	PINE GROVE	Reduce Repeated Outages; Customer-outage-minutes avoided	43,372		78503		80212
31	LVD Repetitive Outage	PULLMAN-CHICORA ELECTRONIC RECLOSERS	66	1	Project	Repetitive Outage Projects	CLYDE	Reduce Repeated Outages; Customer-outage-minutes avoided	3		0		155912
32	LVD Repetitive Outage	PULLMAN-PULLMAN ELECTRONIC RECLOSERS	58	1	Project	Repetitive Outage Projects	CLYDE	Reduce Repeated Outages; Customer-outage-minutes avoided	15,072		0		0
33	LVD Repetitive Outage	RPOUT PETTIS ROAD_PETTIS RD LCP 229	5	1	Project	Repetitive Outage Projects	ADA	Reduce Repeated Outages; Customer-outage-minutes avoided	85,917		27404		329575
34	LVD Repetitive Outage	RPOUT NUNICA_LEONARD LCP 505	18	1	Project	Repetitive Outage Projects	POLKTON	Reduce Repeated Outages; Customer-outage-minutes avoided	9,887		8574		58777
35	LVD Repetitive Outage	RPOUT NUNICA_LEONARD LCP 122	17	1	Project	Repetitive Outage Projects	POLKTON	Reduce Repeated Outages; Customer-outage-minutes avoided	7,525		13729		69495
36	LVD Repetitive Outage	RPOUT Belding_Cooks Corners LCP 689	143	1	Project	Repetitive Outage Projects	BELDING	Reduce Repeated Outages; Customer-outage-minutes avoided	20,000		19749		0
37	LVD Repetitive Outage	RPOUT CASCO_HAWKHEAD LCP 466	10	1	Project	Repetitive Outage Projects	CASCO	Reduce Repeated Outages; Customer-outage-minutes avoided	4,219		0		42485
38	LVD Repetitive Outage	RPOUT NUNICA_LEONARD LCP 125	20	1	Project	Repetitive Outage Projects	POLKTON	Reduce Repeated Outages; Customer-outage-minutes avoided	11,557		2075		70557
39	LVD Repetitive Outage	RPOUT Middleton Newark LCP884	21	1	Project	Repetitive Outage Projects	MAPLE RAPIDS	Reduce Repeated Outages; Customer-outage-minutes avoided	3,590		0		13461
40	LVD Repetitive Outage	RPOUT SPRING LAKE_SPRING LAKE LCP 281	37	1	Project	Repetitive Outage Projects	SPRING LAKE	Reduce Repeated Outages; Customer-outage-minutes avoided	7,200		23374		350504
41	LVD Repetitive Outage	RPOUT CEDAR SPRINGS_EDGERTON LCP 300	7	1	Project	Repetitive Outage Projects	CEDAR SPRINGS	Reduce Repeated Outages; Customer-outage-minutes avoided	35,332		0		0
42	LVD Repetitive Outage	RPOUT HESPERIA_HESPERIA LCP 797	26	1	Project	Repetitive Outage Projects	HESPERIA	Reduce Repeated Outages; Customer-outage-minutes avoided	24,390		0		102071
43	LVD Repetitive Outage	RPOUT 4532 Rives Eaton Rd, Rives	857	1	Project	Repetitive Outage Projects	RIVES	Reduce Repeated Outages; Customer-outage-minutes avoided	123,381		0		462679
44	LVD Repetitive Outage	RPOUT HYDE PARK_ROSS LCP 209	12	1	Project	Repetitive Outage Projects	FRUITLAND	Reduce Repeated Outages; Customer-outage-minutes avoided	16,833		0		281433
45	LVD Repetitive Outage	RPOUT NUNICA_WILSON LCP 531	18	1	Project	Repetitive Outage Projects	RAVENNA	Reduce Repeated Outages; Customer-outage-minutes avoided	282,343		7279		41198
46	LVD Repetitive Outage	RPOUT APPLE_CHATTERSON ROAD LCP 605	26	1	Project	Repetitive Outage Projects	EGELSTON	Reduce Repeated Outages; Customer-outage-minutes avoided	22,770		0		77711
47	LVD Repetitive Outage	RPOUT DONTZ ROAD_KOTT ROAD LCP 515	42	1	Project	Repetitive Outage Projects	MANISTEE	Reduce Repeated Outages; Customer-outage-minutes avoided	33,735		74017		45048
48	LVD Repetitive Outage	RPOUT ROTHBURY_NEW ERA LCP 640	3	1	Project	Repetitive Outage Projects	NEW ERA	Reduce Repeated Outages; Customer-outage-minutes avoided	4,424		0		33183
49	LVD Repetitive Outage	RPOUT EVANSTON_EVANSTON LCP 565	16	1	Project	Repetitive Outage Projects	FRUITPORT	Reduce Repeated Outages; Customer-outage-minutes avoided	1,678		0		6710
50	LVD Repetitive Outage	RPOUT_ENSLEY_BAPTIST LAKE_LCP 754	20	1	Project	Repetitive Outage Projects	ENSLEY	Reduce Repeated Outages; Customer-outage-minutes avoided	20,395		0		0
51		LVD Repetitive Outages Subtotal	4,070						2,890,073		9,616,449		6,645,765

MICHIGAN PUBLIC SERVICE COMMISSION

Consumers Energy Company

Bridge Period LVD Project List

For the Bridge Period 16 Months Ending April 30, 2026

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U21870-AG-CE-0348_Partian_ATT_1

Case No.: U-21870

Exhibit No.: A-166 (JMP-1)

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Witness: JMPartlan

Date: June 2025

Line	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	2023 Customer Outage Minutes	2024 Customer Outage Minutes	
No.	Sub-Program	Project Description, Line, Substation, or Location	Period Spending	Units	Unit Type	Investment Category	Location	Benefit Type	Benefit			
	Reliability											
1	LVD Repetitive Outage	RPOUT HOMER-INDUSTRIAL LCP 659	90	1	Project	Repetitive Outage Projects	HOMER	Reduce Repeated Outages; Customer-outage-minutes avoided	74,462	638611	51536	
2	LVD Repetitive Outage	RPOUT ATHENS-SHERWOOD LCP 137	90	1	Project	Repetitive Outage Projects	ATHENS	Reduce Repeated Outages; Customer-outage-minutes avoided	12,583	26578	69539	
3	LVD Repetitive Outage	RPOUT CENTREVILLE-BUSINESS LCP 293	90	1	Project	Repetitive Outage Projects	CENTREVILLE	Reduce Repeated Outages; Customer-outage-minutes avoided	171,440	0	144193	
4	LVD Repetitive Outage	RPOUT STANWOOD-RIVERSWAY LCP 928	90	1	Project	Repetitive Outage Projects	COLFAX	Reduce Repeated Outages; Customer-outage-minutes avoided	69,996	0	0	
5	LVD Repetitive Outage	RPOUT PEACH RIDGE-KENOWA LCP 390	90	1	Project	Repetitive Outage Projects	SPARTA	Reduce Repeated Outages; Customer-outage-minutes avoided	32,747	43119	69263	
6	LVD Repetitive Outage	RPOUT PRESCOTT-LOGAN LCP 169	90	1	Project	Repetitive Outage Projects	PRESCOTT	Reduce Repeated Outages; Customer-outage-minutes avoided	25,986	11489	150284	
7	LVD Repetitive Outage	RPOUT SURREY-SURREY LCP 718	90	1	Project	Repetitive Outage Projects	FARWELL	Reduce Repeated Outages; Customer-outage-minutes avoided	15,274	11461	75413	
8	LVD Repetitive Outage	RPOUT LAWRENCE-CHRISTIE LAKE LCP 687	90	1	Project	Repetitive Outage Projects	LAWRENCE	Reduce Repeated Outages; Customer-outage-minutes avoided	68,599	357239	40712	
9	LVD Repetitive Outage	RPOUT FREEPORT-CARLTON CENTER LCP 484	90	1	Project	Repetitive Outage Projects	FREEPORT	Reduce Repeated Outages; Customer-outage-minutes avoided	27,438	3588	7798	
10	LVD Repetitive Outage	RPOUT BATES-ACME LCP 226	90	1	Project	Repetitive Outage Projects	ACME	Reduce Repeated Outages; Customer-outage-minutes avoided	7,408	11562	7214	
11	LVD Repetitive Outage	RPOUT SCIPIO-MOSHERVILLE LCP 356	90	1	Project	Repetitive Outage Projects	SCIPIO	Reduce Repeated Outages; Customer-outage-minutes avoided	120,310	965951	31958	
12	LVD Repetitive Outage	RPOUT ONEKAMA-ONEKAMA LCP 113	90	1	Project	Repetitive Outage Projects	ONEKAMA	Reduce Repeated Outages; Customer-outage-minutes avoided	68,120	17710	25306	
13	LVD Repetitive Outage	RPOUT MENDON-PINHOOK LCP 442	90	1	Project	Repetitive Outage Projects	MENDON	Reduce Repeated Outages; Customer-outage-minutes avoided	15,677	95813	48174	
14	LVD Repetitive Outage	RPOUT SCIPIO-POPE ROAD LCP 831	90	1	Project	Repetitive Outage Projects	MOSCOW	Reduce Repeated Outages; Customer-outage-minutes avoided	207,394	741821	223391	
15	LVD Repetitive Outage	RPOUT DEWITT-DEWITT LCP 740	90	1	Project	Repetitive Outage Projects	DEWITT	Reduce Repeated Outages; Customer-outage-minutes avoided	9,201	27580	10565	
16	LVD Repetitive Outage	RPOUT PETTIS ROAD-HONEY CREEK LCP CKT	90	1	Project	Repetitive Outage Projects	ADA	Reduce Repeated Outages; Customer-outage-minutes avoided	51,745	230095	49973	
17	LVD Repetitive Outage	RPOUT WAKESHMA-FULTON LCP 603	90	1	Project	Repetitive Outage Projects	WAKESHMA	Reduce Repeated Outages; Customer-outage-minutes avoided	17,751	197458	28278	
18	LVD Repetitive Outage	RPOUT SPRINGPORT-DEVEREAUX LCP 426	90	1	Project	Repetitive Outage Projects	SPRINGPORT	Reduce Repeated Outages; Customer-outage-minutes avoided	25,349	12616	54576	
19	LVD Repetitive Outage	RPOUT BLUE WATER-SCOTT ROAD LCP 452	90	1	Project	Repetitive Outage Projects	ST JOHNS	Reduce Repeated Outages; Customer-outage-minutes avoided	38,340	99663	12097	
20	LVD Repetitive Outage	RPOUT ABBE-ABBE LCP 328	90	1	Project	Repetitive Outage Projects	MENTOR	Reduce Repeated Outages; Customer-outage-minutes avoided	84,156	67656	59212	
21	LVD Repetitive Outage	RPOUT FINE LAKE-DOWLING LCP 433	90	1	Project	Repetitive Outage Projects	JOHNSTOWN	Reduce Repeated Outages; Customer-outage-minutes avoided	6,894	0	52451	
22	LVD Repetitive Outage	RPOUT BURTCR ROAD-BURTCR ROAD LCP 734	90	1	Project	Repetitive Outage Projects	GRASS LAKE	Reduce Repeated Outages; Customer-outage-minutes avoided	23,691	315398	23047	
23	LVD Repetitive Outage	RPOUT LOMBARD-LOMBARD LCP 281	90	1	Project	Repetitive Outage Projects	ALBION	Reduce Repeated Outages; Customer-outage-minutes avoided	51,398	660884	8906	
24	LVD Repetitive Outage	RPOUT FRANKFORT-CRYSTALLIA LCP 5032	90	1	Project	Repetitive Outage Projects	FRANKFORT	Reduce Repeated Outages; Customer-outage-minutes avoided	57,696	0	19329	
25	LVD Repetitive Outage	RPOUT BURR OAK-DOUGLAS LCP 842	90	1	Project	Repetitive Outage Projects	BURR OAK	Reduce Repeated Outages; Customer-outage-minutes avoided	73,482	38201	1106	
26	LVD Repetitive Outage	RPOUT OBERLIN-BENMARK LCP 841	90	1	Project	Repetitive Outage Projects	SAGE	Reduce Repeated Outages; Customer-outage-minutes avoided	51,288	15245	37726	
27	LVD Repetitive Outage	RPOUT HOMESTEAD-BEULAH LCP 186	90	1	Project	Repetitive Outage Projects	BEULAH	Reduce Repeated Outages; Customer-outage-minutes avoided	27,927	2754	36606	
28	LVD Repetitive Outage	RPOUT BATH-BATH LCP 215	90	1	Project	Repetitive Outage Projects	OLIVE	Reduce Repeated Outages; Customer-outage-minutes avoided	22,739	5337	8828	
29	LVD Repetitive Outage	RPOUT NUNICA-WILSON LCP 646	90	1	Project	Repetitive Outage Projects	RAVENNA	Reduce Repeated Outages; Customer-outage-minutes avoided	94,712	83480	11807	
30	LVD Repetitive Outage	RPOUT CLEAR LAKE-WATERLOO LCP 174	90	1	Project	Repetitive Outage Projects	WATERLOO	Reduce Repeated Outages; Customer-outage-minutes avoided	236,071	1283847	35001	
31	LVD Repetitive Outage	RPOUT PARMA-PARMA LCP 130	90	1	Project	Repetitive Outage Projects	PARMA	Reduce Repeated Outages; Customer-outage-minutes avoided	22,450	12409	4016	
32	LVD Repetitive Outage	RPOUT SYLVAN-CITY LCP 743	90	1	Project	Repetitive Outage Projects	CHELSEA	Reduce Repeated Outages; Customer-outage-minutes avoided	132,723	230078	33277	
33	LVD Repetitive Outage	RPOUT SHERIDAN-FENWICK LCP 16	90	1	Project	Repetitive Outage Projects	SHERIDAN	Reduce Repeated Outages; Customer-outage-minutes avoided	107,517	135597	254896	
34	LVD Repetitive Outage	RPOUT FENNVILLE-COMMERCIAL LCP 878	90	1	Project	Repetitive Outage Projects	FENNVILLE	Reduce Repeated Outages; Customer-outage-minutes avoided	90,365	58775	57402	
35	LVD Repetitive Outage	RPOUT ENGLISHVILLE-ENGLISHVILLE LCP 455	90	1	Project	Repetitive Outage Projects	SPARTA	Reduce Repeated Outages; Customer-outage-minutes avoided	23,999	0	0	
36	LVD Repetitive Outage	RPOUT STANTON-STANTON LCP 263	90	1	Project	Repetitive Outage Projects	STANTON	Reduce Repeated Outages; Customer-outage-minutes avoided	48,975	267468	113634	
37	LVD Repetitive Outage	RPOUT ALAMO-OWEN LCP CKT	90	1	Project	Repetitive Outage Projects	OSHTEMO	Reduce Repeated Outages; Customer-outage-minutes avoided	257,136	1485494	35013	
38	LVD Repetitive Outage	RPOUT OSHTEMO-HURD LCP 441	90	1	Project	Repetitive Outage Projects	OSHTEMO	Reduce Repeated Outages; Customer-outage-minutes avoided	44,158	490165	9956	
39	LVD Repetitive Outage	RPOUT VANDERCOOK LAKE-HAGUE ROAD LCP 806	90	1	Project	Repetitive Outage Projects	LIBERTY	Reduce Repeated Outages; Customer-outage-minutes avoided	105,562	809134	26320	
40	LVD Repetitive Outage	RPOUT HOLTON-MAPLE ISLAND LCP 658	90	1	Project	Repetitive Outage Projects	FREMONT	Reduce Repeated Outages; Customer-outage-minutes avoided	88,062	0	55352	
41	LVD Repetitive Outage	RPOUT BATTEESE-MUNITH LCP 9461	90	1	Project	Repetitive Outage Projects	WATERLOO	Reduce Repeated Outages; Customer-outage-minutes avoided	21,846	227204	19029	
42	LVD Repetitive Outage	RPOUT SHERIDAN-SIDNEY LCP 175	90	1	Project	Repetitive Outage Projects	SHERIDAN	Reduce Repeated Outages; Customer-outage-minutes avoided	21,254	73605	5595	
43	LVD Repetitive Outage	RPOUT COOKE DAM-VILLAGE LCP 805	90	1	Project	Repetitive Outage Projects	PLAINFIELD	Reduce Repeated Outages; Customer-outage-minutes avoided	58,675	8436	527685	
44	LVD Repetitive Outage	RPOUT FINE LAKE-BRISTOL LCP 417	90	1	Project	Repetitive Outage Projects	JOHNSTOWN	Reduce Repeated Outages; Customer-outage-minutes avoided	4,923	20182	40035	
45	LVD Repetitive Outage	RPOUT JOPPA-BECKLEY LCP 868	90	1	Project	Repetitive Outage Projects	BATTLE CREEK	Reduce Repeated Outages; Customer-outage-minutes avoided	48,132	513624	35174	
46	LVD Repetitive Outage	RPOUT KNIGHT-FARLEY LCP 784	90	1	Project	Repetitive Outage Projects	GILFORD	Reduce Repeated Outages; Customer-outage-minutes avoided	33,152	0	238614	
47	LVD Repetitive Outage	RPOUT DEERFIELD-RODESILER LCP 5	90	1	Project	Repetitive Outage Projects	DEERFIELD	Reduce Repeated Outages; Customer-outage-minutes avoided	22,860	128151	125428	
48	LVD Repetitive Outage	RPOUT SCOTTVILLE-US-31 LCP 397	90	1	Project	Repetitive Outage Projects	FREESOIL	Reduce Repeated Outages; Customer-outage-minutes avoided	14,875	16086	3743	
49	LVD Repetitive Outage	RPOUT HAGADORN-HAGADORN LCP 82	90	1	Project	Repetitive Outage Projects	LANSING	Reduce Repeated Outages; Customer-outage-minutes avoided	16,040	0	153341	
50	LVD Repetitive Outage	RPOUT LOCH ERIN-PENTECOST LCP 353	90	1	Project	Repetitive Outage Projects	FRANKLIN	Reduce Repeated Outages; Customer-outage-minutes avoided	142,307	1420749	3173	
51		LVD Repetitive Outages Subtotal	4,500						3,094,884	11,862,313	3,135,972	

MICHIGAN PUBLIC SERVICE COMMISSION

Consumers Energy Company

Bridge Period LVD Project List

For the Bridge Period 16 Months Ending April 30, 2026

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U21870-AG-CE-0348_Partlan_ATT_1

Case No.: U-21870

Exhibit No.: A-166 (JMP-1)

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Witness: JMPartlan

Date: June 2025

Line	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	2023 Customer Outage Minutes	2024 Customer Outage Minutes	
No.	Sub-Program	Project Description, Line, Substation, or Location	Period Spending	Units	Unit Type	Investment Category	Location	Benefit Type	Benefit			
	Reliability											
1	LVD Repetitive Outage	RPOUT TWILIGHT-RICHLAND FARMS LCP 952	90	1	Project	Repetitive Outage Projects	RICHLAND	Reduce Repeated Outages; Customer-outage-minutes avoided	29,786	55525	93938	
2	LVD Repetitive Outage	RPOUT CLARE-FARWELL LCP 292	90	1	Project	Repetitive Outage Projects	CLARE	Reduce Repeated Outages; Customer-outage-minutes avoided	22,645	0	31524	
3	LVD Repetitive Outage	RPOUT BURR OAK-DOUGLAS LCP 917	90	1	Project	Repetitive Outage Projects	BURR OAK	Reduce Repeated Outages; Customer-outage-minutes avoided	20,659	110267	42769	
4	LVD Repetitive Outage	RPOUT SUNFIELD-SUNFIELD LCP 729	90	1	Project	Repetitive Outage Projects	SUNFIELD	Reduce Repeated Outages; Customer-outage-minutes avoided	31,764	11644	50193	
5	LVD Repetitive Outage	RPOUT SCOTTS-WHITE LCP 272	90	1	Project	Repetitive Outage Projects	CHARLESTON	Reduce Repeated Outages; Customer-outage-minutes avoided	11,357	74328	17074	
6	LVD Repetitive Outage	RPOUT LEHRING-COLE ROAD LCP 647	90	1	Project	Repetitive Outage Projects	BYRON	Reduce Repeated Outages; Customer-outage-minutes avoided	74,963	408631	622482	
7	LVD Repetitive Outage	RPOUT RAVINE-PATTERSON LCP 615	90	1	Project	Repetitive Outage Projects	KALAMAZOO	Reduce Repeated Outages; Customer-outage-minutes avoided	18,879	15597	128001	
8	LVD Repetitive Outage	RPOUT GRAYLING-RIVER LCP 148	90	1	Project	Repetitive Outage Projects	GRAYLING	Reduce Repeated Outages; Customer-outage-minutes avoided	27,118	0	221583	
9	LVD Repetitive Outage	RPOUT KENT CITY-CASNOVIA LCP 895	90	1	Project	Repetitive Outage Projects	CASNOVIA	Reduce Repeated Outages; Customer-outage-minutes avoided	5,767	0	46546	
10	LVD Repetitive Outages	RPOUT ARTHUR-BERLIN LCP 967	80	1	Project	Repetitive Outage Projects	POLKTON	Reduce Repeated Outages; Customer-outage-minutes avoided	29,605	58075	201603	
11	LVD Repetitive Outages	RPOUT HANOVER-PULASKI LCP 886	90	1	Project	Repetitive Outage Projects	HANOVER	Reduce Repeated Outages; Customer-outage-minutes avoided	132,165	957378	18053	
12	LVD Repetitive Outages	RPOUT FINE LAKE-BRISTOL LCP 493	90	1	Project	Repetitive Outage Projects	JOHNSTOWN	Reduce Repeated Outages; Customer-outage-minutes avoided	25,740	3997	9683	
13	LVD Repetitive Outages	RPOUT PALO-PALO LCP 244	90	1	Project	Repetitive Outage Projects	N PLAINS	Reduce Repeated Outages; Customer-outage-minutes avoided	73,192	6833	161540	
14	LVD Repetitive Outages	RPOUT SMITH CREEK-WRIGHT LCP 5039	90	1	Project	Repetitive Outage Projects	WEST BRANCH	Reduce Repeated Outages; Customer-outage-minutes avoided	18,821	9159	32278	
15	LVD Repetitive Outages	RPOUT RODNEY-RODNEY LCP 452	90	1	Project	Repetitive Outage Projects	COLFAX	Reduce Repeated Outages; Customer-outage-minutes avoided	159,618	0	54325	
16	LVD Repetitive Outages	RPOUT BURTTCH ROAD-WELCH LAKE LCP 266	90	1	Project	Repetitive Outage Projects	GRASS LAKE	Reduce Repeated Outages; Customer-outage-minutes avoided	320,770	2015846	69601	
17	LVD Repetitive Outages	RPOUT ST CHARLES-SAGINAW LCP 604	90	1	Project	Repetitive Outage Projects	ST CHARLES	Reduce Repeated Outages; Customer-outage-minutes avoided	43,306	26212	80223	
18	LVD Repetitive Outages	RPOUT MENDON-KIRBY LCP 167	90	1	Project	Repetitive Outage Projects	MENDON	Reduce Repeated Outages; Customer-outage-minutes avoided	6,815	9474	6618	
19	LVD Repetitive Outages	RPOUT RAVENNA-RAVENNA LCP 17	90	1	Project	Repetitive Outage Projects	RAVENNA	Reduce Repeated Outages; Customer-outage-minutes avoided	24,235	7485	174080	
20	LVD Repetitive Outages	RPOUT MARKER LAKE-KYSER ROAD LCP 184	90	1	Project	Repetitive Outage Projects	BOSTON	Reduce Repeated Outages; Customer-outage-minutes avoided	22,322	151402	3342	
21	LVD Repetitive Outages	RPOUT COIT AVENUE-RIFLE RANGE LCP 457	90	1	Project	Repetitive Outage Projects	GRAND RAPIDS	Reduce Repeated Outages; Customer-outage-minutes avoided	43,548	116587	16171	
22	LVD Repetitive Outages	RPOUT FENTON-SILVER LAKE LCP 440	90	1	Project	Repetitive Outage Projects	FENTON	Reduce Repeated Outages; Customer-outage-minutes avoided	19,600	132022	91860	
23	LVD Repetitive Outages	RPOUT MCBAIN-VOGEL CENTER LCP 200	90	1	Project	Repetitive Outage Projects	MCBAIN	Reduce Repeated Outages; Customer-outage-minutes avoided	10,096	14155	41888	
24	LVD Repetitive Outages	RPOUT STOCKBRIDGE-MORTON LCP 456	90	1	Project	Repetitive Outage Projects	STOCKBRIDGE	Reduce Repeated Outages; Customer-outage-minutes avoided	23,518	30363	12589	
25	LVD Repetitive Outages	RPOUT HARRISON-HARRISON LCP 5883	90	1	Project	Repetitive Outage Projects	HARRISON	Reduce Repeated Outages; Customer-outage-minutes avoided	27,627	17930	87681	
26	LVD Repetitive Outages	RPOUT ENGLISHVILLE-ENGLISHVILLE LCP 56	90	1	Project	Repetitive Outage Projects	SPARTA	Reduce Repeated Outages; Customer-outage-minutes avoided	56,934	176077	178315	
27	LVD Repetitive Outages	RPOUT SWAN CREEK-MINING LCP 70	90	1	Project	Repetitive Outage Projects	CLYDE	Reduce Repeated Outages; Customer-outage-minutes avoided	86,774	10704	33579	
28	LVD Repetitive Outages	RPOUT BELLEVUE-BELLEVUE LCP 77	90	1	Project	Repetitive Outage Projects	BELLEVUE	Reduce Repeated Outages; Customer-outage-minutes avoided	46,623	54512	16955	
29	LVD Repetitive Outages	RPOUT MANTON-GILBERT LCP 346	90	1	Project	Repetitive Outage Projects	MANTON	Reduce Repeated Outages; Customer-outage-minutes avoided	27,375	117173	51252	
30	LVD Repetitive Outages	RPOUT MAPLE CITY-CEDAR LCP 745	90	1	Project	Repetitive Outage Projects	CLEVELAND	Reduce Repeated Outages; Customer-outage-minutes avoided	84,342	190869	35521	
31	LVD Repetitive Outages	RPOUT BAILEY-CHERRY LCP 259	90	1	Project	Repetitive Outage Projects	ASHLAND	Reduce Repeated Outages; Customer-outage-minutes avoided	18,294	147477	36558	
32	LVD Repetitive Outages	RPOUT PEACOCK-STOLL ROAD LCP 475	90	1	Project	Repetitive Outage Projects	WOODHULL	Reduce Repeated Outages; Customer-outage-minutes avoided	42,716	25673	206357	
33	LVD Repetitive Outages	RPOUT FOREMAN-VERGENNES LCP 334	90	1	Project	Repetitive Outage Projects	ADA	Reduce Repeated Outages; Customer-outage-minutes avoided	72,880	417474	3446	
34	LVD Repetitive Outages	RPOUT BALCON-BANKERS LCP 690	90	1	Project	Repetitive Outage Projects	HILLSDALE	Reduce Repeated Outages; Customer-outage-minutes avoided	45,949	566916	41270	
35	LVD Repetitive Outages	RPOUT RATIGAN-MURRAY LAKE LCP 557	90	1	Project	Repetitive Outage Projects	OTISCO	Reduce Repeated Outages; Customer-outage-minutes avoided	40,155	165726	16204	
36	LVD Repetitive Outages	RPOUT CERESCO-RURAL LCP 53	90	1	Project	Repetitive Outage Projects	MARSHALL	Reduce Repeated Outages; Customer-outage-minutes avoided	24,884	194837	30662	
37	LVD Repetitive Outages	RPOUT GLADWIN-BUZZELL LCP 311	90	1	Project	Repetitive Outage Projects	GLADWIN	Reduce Repeated Outages; Customer-outage-minutes avoided	18,784	18574	11407	
38	LVD Repetitive Outages	RPOUT EDMORE-SIX LAKES LCP 878	90	1	Project	Repetitive Outage Projects	EDMORE	Reduce Repeated Outages; Customer-outage-minutes avoided	9,511	0	0	
39	LVD Repetitive Outages	RPOUT CASINO-LEATON LCP 625	90	1	Project	Repetitive Outage Projects	UNION	Reduce Repeated Outages; Customer-outage-minutes avoided	29,445	7309	50665	
40	LVD Repetitive Outages	RPOUT BITTERSWEET-RIVER ROAD LCP 747	90	1	Project	Repetitive Outage Projects	TROWBRIDGE	Reduce Repeated Outages; Customer-outage-minutes avoided	20,344	39354	25685	
41	LVD Repetitive Outages	RPOUT HOLTON-MAPLE ISLAND LCP 496	90	1	Project	Repetitive Outage Projects	FREMONT	Reduce Repeated Outages; Customer-outage-minutes avoided	14,995	14026	130260	
42	LVD Repetitive Outages	RPOUT LINCOLN-MIKADO LCP 799	90	1	Project	Repetitive Outage Projects	GREENBUSH	Reduce Repeated Outages; Customer-outage-minutes avoided	52,550	0	156927	
43	LVD Repetitive Outages	RPOUT WAYLAND-WAYLAND LCP 741	90	1	Project	Repetitive Outage Projects	WAYLAND	Reduce Repeated Outages; Customer-outage-minutes avoided	33,326	5313	167529	
44	LVD Repetitive Outages	RPOUT MERSON-PIKE LAKE LCP 689	90	1	Project	Repetitive Outage Projects	TROWBRIDGE	Reduce Repeated Outages; Customer-outage-minutes avoided	54,996	9983	123900	
45	LVD Repetitive Outages	RPOUT PALO-PALO LCP 198	90	1	Project	Repetitive Outage Projects	N PLAINS	Reduce Repeated Outages; Customer-outage-minutes avoided	50,023	31595	15000	
46	LVD Repetitive Outages	RPOUT READING-CAMBRIA LCP 670	90	1	Project	Repetitive Outage Projects	READING	Reduce Repeated Outages; Customer-outage-minutes avoided	29,058	400532	6423	
47	LVD Repetitive Outages	RPOUT BREEDSVILLE-GRAND JUNCTION LCP 823	90	1	Project	Repetitive Outage Projects	COLUMBIA	Reduce Repeated Outages; Customer-outage-minutes avoided	7,122	0	42878	
48	LVD Repetitive Outages	RPOUT BEAVER-SEIDLERS LCP 76	90	1	Project	Repetitive Outage Projects	KAWKAWLIN	Reduce Repeated Outages; Customer-outage-minutes avoided	19,107	15548	72057	
49	LVD Repetitive Outages	RPOUT MACKINAW CITY-POND STREET LCP 542	90	1	Project	Repetitive Outage Projects	MACKINAW CITY	Reduce Repeated Outages; Customer-outage-minutes avoided	30,025	17725	28949	
50	LVD Repetitive Outages	RPOUT LOVEJOY-BRADEN LCP CKT	90	1	Project	Repetitive Outage Projects	ARGENTINE	Reduce Repeated Outages; Customer-outage-minutes avoided	651,310	242549	35250	
51		LVD Repetitive Outages Subtotal	4,490						2,791,437	7,102,856	3,832,694	

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Question:

158. Refer to Figure 56 on page 133 of Ms. Hayward's direct testimony on HVD Substations Capacity capex. Please:

- a. Expand this table to include the same information for each year 2021-2024 actual and forecasted for 2025, 2026, 2027. Provide it in Excel.
- b. Explain why four and 11 new substations are needed. Identify the requirements and locations where the new substations are needed.
- c. For the existing substation projects, identify what problems are being addressed and at which existing locations.

Response:

Figure 56 on page 133 of my testimony is in support of LVD Substations Capacity, which is the investment category that will be referenced in my responses below:

- a. For 2021-2024 actuals, see Exhibit A-130 (MPK-20), page 2, lines 10-13, Substations Capacity - LVD. See Attachment 1 to this response for 2025-2027 forecasted. 2027 forecasted only includes work through April 2027, which is the end of the Test Year.
- b. The new substation forecasts for the bridge period and test year represent spending on new substations, transformer purchase order milestone payments, and right-of-way (ROW) for new substations and associated HVD Lines. Transformer fabrication currently spans multiple years so purchase orders for projects in the test year and beyond the test year need to be initiated, and milestone payments will be made during various phases of transformer fabrication according to the purchase order contracts. The scopes for the 4 bridge period projects and 11 test year projects are noted in Attachment 2.
- c. The problems addressed by each investment category within the LVD Substations Capacity sub-program are described in detail in pages 129-133 of my direct testimony. In addition, the new substations for the bridge period and test year address the problems noted in Attachment 2.

Witness: Megan L. Hayward

Date: September 10, 2025

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LVD SUBSTATION CAPACITY

Investment Categories	2025 Forecasted	2025 # of Units Forecasted	2026 Forecasted	2026 # of Units Forecasted	2027 Forecasted *	2027 # of Units Forecasted *
New substations	\$ 3,021,157	4	\$ 17,532,717	12	\$ 4,884,860	3
Existing substations capacity increase projects + Other Project and Charges	\$ 19,220,843	18	\$ 6,384,200	7	\$ 863,690	3
Totals	\$ 22,242,000	22	\$ 23,916,917	19	\$ 5,748,550	6

* 2027 Forecasted only includes work through April 2027, which is the end of the Test Year

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Hayward Attachment 2			
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Bridge Period

No.	Substation/Project	Part b - Scope	Part c - Problem Resolution
1	SKYLINE	2025 new substation	Serve load growth to avoid Gerrish Substation overload
2	MERCURY	Transformer purchase order milestone payments	Serve load growth to avoid Renton Substation overload
3	VALENTINE	Transformer purchase order milestone payments	Serve load growth to avoid Pavilion Substation overload
4	ERASTUS	Substation ROW purchase	Serve load growth to avoid Clare Substation overload

Test Year

No.	Substation/Project	Part b - Scope	Part c - Problem Resolution
1	ERASTUS	2026 new substation	Serve load growth to avoid Clare Substation overload
2	MERCURY	2026 new substation	Serve load growth to avoid Renton Substation overload
3	VALENTINE	2026 new substation	Serve load growth to avoid Pavilion Substation overload
4	CHANNEL	Transformer purchase order milestone payments	Serve load growth to avoid Manistee Substation overload
5	QUICKSILVER	Transformer purchase order milestone payments	Serve load growth to avoid Wealthy Street Substation overload
6	RED HAWK	Transformer purchase order milestone payments	Serve load growth to avoid Cedar Springs Substation overload
7	BELVEDERE	Substation and HVD Lines ROW purchases	Serve load growth to avoid Saugatuck Substation overload
8	GARMAN FOSTER	HVD Lines ROW purchases	Serve load growth to avoid Mendon Substation overload
9	GRAHAM ROAD	Substation ROW purchase	Serve load growth to avoid Thomas Substation overload
10	PRATT LAKE	Substation and HVD Lines ROW purchases	Serve load growth to avoid Alto Substation overload
11	WADSTEN	Substation and HVD Lines ROW purchases	Serve load growth to avoid LVD Lines overload on Saranac Substation

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Question:

145. Refer to lines 17-24 on page 30 and lines 1-16 on page 31 of Ms. Hayward's direct testimony on the shifting of HVD Lines Reliability capital expenditures among different sub-programs. For each year 2021 to 2027, please provide a common comparison of capital expenditures and number of units in each program in Excel based on the current alignment of where they are now categorized.

Response:

See Attachment 1 for a comparison and a combination of the capital expenditures and units of the HVD Lines Reliability and the HVD Lines portion of the HVD Lines and Substations Rehabilitation programs.

Witness: Megan L. Hayward

Date: September 11, 2025

CECo Response to AG-CE-0464

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Hayward Attachment 1
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HVD Lines Reliability														
Investment Categories	2021 Capital	2021 # of Units	2022 Capital	2022 # of Units	2023 Capital	2023 # of Units	2024 Capital	2024 # of Units	2025 Capital	2025 # of Units	2026 Capital	2026 # of Units	2027 Capital	2027 # of Units
Line Rebuilds	\$ 32,946,529	32 miles	\$18,219,292	40 miles	\$ 15,077,709	9.2 miles	\$ 8,976,122	12.1 miles	\$ 21,642,000	11.4 miles	\$ 34,779,000	56.1 miles	\$ 50,366,000	76.8 miles
Pole Top Rehabilitations	\$ 13,583,527	110 miles	\$7,195,963	95 miles	\$ 504,706	7.4 miles	\$ 5,583,078	49.1 miles	\$ 6,380,000	54.4 miles	\$ 11,475,000	112 miles	\$ 9,623,000	93.6 miles
Pole Replacements per pole inspection program	\$ 9,739,363	402 poles	\$15,152,831	545 poles	\$ 6,011,798	234 poles	\$ 16,201,485	488 poles	\$ 46,396,000	1700 poles	\$ 34,387,000	1260 poles	\$ 22,652,000	830 poles
Line Sensors	\$ -	N/A	\$ -	N/A	\$ -	N/A		N/A	\$ 1,734,000	138 Sensors	\$ 1,759,000	140 Sensors	\$ 1,759,000	140 Sensors
Switches (inc. SCADA additions)	\$ 1,822,919	26 switches	\$1,997,034	35 switches	\$ 108,982	4 switches	\$ 607,027	3 switches	\$ 5,776,000	40 switches	\$ 7,942,000	55 switches	\$ 7,942,000	55 switches
Right of Way	\$ -	N/A	\$ -	N/A		N/A	\$ 895,861	N/A	\$ 9,000,000	N/A	\$ 11,000,000	N/A	\$ 11,000,000	N/A
Individual Pole Top Assemblies	\$ -	N/A	\$ -	N/A	\$ -	N/A	\$ -	N/A	\$ 7,072,000	850 PTAs	\$ 5,658,000	600 PTAs	\$ 5,658,000	600 PTAs
Total	\$ 58,092,338		\$ 42,565,119		\$ 21,703,195		\$ 32,263,573		\$ 98,000,000		\$ 107,000,000		\$ 109,000,000	

HVD Lines Portion of HVD Lines and Substations Rehabilitation														
Investment Categories	2021 Capital	2021 # of Units	2022 Capital	2022 # of Units	2023 Capital	2023 # of Units	2024 Capital	2024 # of Units	2025 Capital	2025 # of Units	2026 Capital	2026 # of Units	2027 Capital	2027 # of Units
Pole Replacement	\$ 4,007,742	227 poles	\$ 7,098,950	291 poles	\$ 4,277,002	146 poles	\$ 6,981,392	284 poles	\$ -	N/A	\$ -	N/A	\$ -	N/A
Pole Top Assembly Replacements	\$ 5,597,280	541 PTAs	\$ 5,579,111	563 PTAs	\$ 4,061,358	482 PTAs	\$ 3,056,556	301 PTAs	\$ -	N/A	\$ -	N/A	\$ -	N/A
Switch (including MOAB) Replacements	\$ 552,306	4 switches	\$ 958,270	10 switches	\$ 273,642	5 switches	\$ 1,422,525	17 switches	\$ -	N/A	\$ -	N/A	\$ -	N/A
Miscellaneous Other Replacements	\$ 46,576	7 projects	\$ 186,377	3 projects	\$ 181,203	1 project	\$ 24,695	1 project	\$ -	N/A	\$ -	N/A	\$ -	N/A
Total	\$ 10,203,903		\$ 13,822,709		\$ 8,793,205		\$ 11,485,168		\$ -		\$ -		\$ -	

HVD Lines Reliability and HVD Lines Portion of HVD Lines and Substations Rehabilitation Combined														
Investment Categories	2021 Capital	2021 # of Units	2022 Capital	2022 # of Units	2023 Capital	2023 # of Units	2024 Capital	2024 # of Units	2025 Capital	2025 # of Units	2026 Capital	2026 # of Units	2027 Capital	2027 # of Units
Line Rebuilds	\$ 32,993,105	32 miles	\$ 18,405,669	40 miles	\$ 15,258,912	9.2 miles	\$ 9,000,817	12.1 miles	\$ 21,642,000	11.4 miles	\$ 34,779,000	56.1 miles	\$ 50,366,000	76.8 miles
Pole Top Rehabilitations	\$ 13,583,527	110 miles	\$ 7,195,963	95 miles	\$ 504,706	7.4 miles	\$ 5,583,078	49.1 miles	\$ 6,380,000	54.4 miles	\$ 11,475,000	112 miles	\$ 9,623,000	93.6 miles
Pole Replacements per pole inspection program	\$ 13,747,105	629 poles	\$ 22,251,781	836 poles	\$ 10,288,800	380 poles	\$ 23,182,877	772 poles	\$ 46,396,000	1700 poles	\$ 34,387,000	1260 poles	\$ 22,652,000	830 poles
Line Sensors	\$ -	N/A	\$ -	N/A	\$ -	N/A	\$ -	N/A	\$ 1,734,000	138 Sensors	\$ 1,759,000	140 Sensors	\$ 1,759,000	140 Sensors
Switches (inc. SCADA additions)	\$ 2,375,225	30 switches	\$ 2,955,304	45 switches	\$ 382,624	9 switches	\$ 2,029,552	20 switches	\$ 5,776,000	40 switches	\$ 7,942,000	55 switches	\$ 7,942,000	55 switches
Right of Way	\$ -	N/A	\$ -	N/A	\$ -	N/A	\$ 895,861	N/A	\$ 9,000,000	N/A	\$ 11,000,000	N/A	\$ 11,000,000	N/A
Individual Pole Top Assemblies	\$ 5,597,280	541 PTAs	\$ 5,579,111	563 PTAs	\$ 4,061,358	482 PTAs	\$ 3,056,556	301 PTAs	\$ 7,072,000	850 PTAs	\$ 5,658,000	600 PTAs	\$ 5,658,000	600 PTAs
Total	\$ 68,296,242		\$ 56,387,828		\$ 30,496,400		\$ 43,748,741		\$ 98,000,000		\$ 107,000,000		\$ 109,000,000	

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Question:

146. Refer to lines 18-25 on page 44 of Ms. Hayward's direct testimony on the backlog of red tagged poles to be replaced. Please:

- a. Explain why the Company built a backlog of 2,250 poles and did not address the replacement of those poles timely in prior years.
- b. Provide the backlog at the end of 2016 and the number of poles added and subtracted from the backlog each year from 2017 to 2024 and forecasted for 2025 to 2027.

Response:

- a. High Voltage Distribution (HVD) Pole inspections are on a 12-year cycle. In the past, the Company leveraged a tactic to address HVD pole replacements prior to the next inspection cycle for planned replacements. The Company also leveraged a tactic to integrate individual pole replacements within larger projects, such as full line or line sections pole top rehabilitations or rebuilds. This methodology can slow the replacement of individual poles as these larger projects often require additional right of way and various time-consuming permits. Over time the integration of individual pole replacements into larger projects caused the backlog to rise. Additionally, the Company experienced a couple of pole failures prior to planned replacement. The rise of backlog and pole failures prior to replacement have shown a need to address poles failing inspection in a quicker timeframe than before the next inspection cycle. The reduction of the pole backlog is in alignment with the recommendations set forth in the MPSC's audit report.
- b. See the table on the page 2 for the approximate red tagged pole backlog to begin each year. Poles replaced and identified in each year are also noted for 2017 through 2024. For 2025 through 2027 all pole identification and replacement numbers are forecasts based on plans and historical rejection rates during inspections.

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Year	Red-Tagged Poles at Year End	Poles Rejected During Inspection (+)	Red-Tagged Poles Replaced During Year (-)
2016	1,353		
2017	1,226	726	853
2018	1,440	994	780
2019	1,604	617	453
2020	1,395	406	615
2021	1,754	843	484
2022	1,197	17	574
2023	1,935	1013	275
2024	2,250	952	637
2025	1,339	789	1700
2026	869	790	1260
2027	829	790	830

Witness: Megan L. Hayward
Date: September 10, 2025

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Page 1 of 1

Question:

150. Refer to Figure 29 on page 64 of Ms. Hayward's direct testimony on HVD Substations Reliability capex. Please:

- a. Expand this table to include the same information, except for Benefit Customer Minutes, for each year 2021-2024 actual and forecasted for 2025, 2026, 2027. Provide it also in Excel.
- b. Identify expenditures of \$1 million or greater included in Other and explain what they entail for the bridge period and projected test year.
- c. Explain why it is reasonable for capex to increase from the \$4.6 million in the historical 5-year average amount shown in Figure 30 to nearly 10 times that amount in the bridge period and projected test year.

Response:

- a.) For 2021-2024 actuals, see Exhibit A-130 (MPK-20), page 1, lines 27-31, HVD Substations Reliability. See Attachment 1 to this response for 2025-2027 forecasted.
- b.) The "other" line item in Figure 29 refers to the "HVD Subs Other Equipment and Animal Mitigation Projects" category, and the projects are listed in Exhibit A-109 (MLH-3), page 2, lines 28-123; and Exhibit A-110 (MLH-4), page 2, lines 28-53. None of the individual projects in this category exceed \$1 million. There are some line items in those referenced exhibit lines that exceed \$1 million, but these are aggregate amounts of work.
- c.) The Company's overall rationale for increasing this investment in HVD substations is laid out in Exhibit A-129 (MPK-19), pages 121 through 128, with a summary beginning under the header "5-Year Investment Plan" on page 127. See also page 58, line 17, through page 59, line 12 of my direct testimony regarding increased investment. Additionally, as described on page 57, lines 4-12, of my direct testimony, investment in HVD Substations Reliability is higher due to the transfer of investment that was previously in the old HVD Lines and Substations Rehabilitation sub-program.

Witness: Megan L. Hayward
Date: September 12, 2025

CECo Response to AG-CE-0469

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Hayward Attachment 1					
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Investment Categories	2025 Forecasted		2026 Forecasted		2027 Forecasted	
	Capital (\$)	Units	Capital (\$)	Units	Capital (\$)	Units
Circuit breaker/switcher replacements	\$10,941,000	31	\$18,173,000	53	\$20,600,000	52
Transformer bushing replacements	\$895,000	6	\$675,000	4	\$1,176,000	8
Switch replacements	\$3,456,000	52	\$4,996,000	125	\$5,750,000	115
Other	\$17,930,000	128	\$18,456,000	190	\$6,914,000	105
Total	\$33,222,000		\$42,300,000		\$34,440,000	

Note: Due to Material Availability, Outage Availability, Mobile Substation Availability, and Investment Category bundling, specific investment categories quantities are shifted from year-to-year, as work initiation may occur in a Switch Replacement category versus a Transformer Bushing Replacement, as an example.

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Question:

168. Refer to Exhibits A-109 and A-110. For each project with a cost of \$3 million or greater, please provide the current phase of the project (scoping, conceptual design, engineering design, construction, completed, etc.), when this phase started and will be completed, and when the next phase will start and be completed. Provide this information in Excel. Provide also a reference to a page and line number where that project is shown in Exhibit A-109 or A-110.

Response:

Please refer to Attachments 1 and 2 to this discovery response. These attachments both take Exhibits A-109 and A-110 and simply provide the requested information for all projects with a cost of \$3 million or greater directly in the exhibit, so the projects can easily be cross-referenced. Statuses are not provided for projects costing less than \$3 million.

Witness: Megan L. Hayward

Date: September 12, 2025

MICHIGAN PUBLIC SERVICE COMMISSION
 Consumers Energy Company
 Distribution Projects
 Summary Projected Electric Capital Expenditures
 For the Bridge Period 16 Months Ending April 30th, 2026
 (\$000)

AG-CE-0487

Case No.: U-21870
 Exhibit No.: A-109 (MLH-3)
 Page: 3 of 13
 Witness: MLHayward
 Date: June 2025

Line No.	(a) Sub-Program	(b) Project Description, Line, Substation, or Location	(c) Projected Period Spending (Bridge)	(d) Units	(e) Unit Type	(f) Investment Category	Benefit Type	Benefit	Location	STATUS
1	Transformer Bank Replacements and Substat	WD0270 N BELDING SUB REBUILD *10	1,742	1	Projects	HVD Substation Rebuilds	Customer*Minutes Avoided	78,624	Ionia	
2	Transformer Bank Replacements and Substat	WD0354 ALMA PRODUCTS RPL TB1 *10	1,700	1	Equipment	HVD Substation Transformer Replacement	Imminent Failure		Gratiot	
3	Transformer Bank Replacements and Substat	WD0596 FRAME PLANT - REPL TB2 & TB3 *02	1,869	2	Equipment	HVD Substation Transformer Replacement	Imminent Failure		Genesee	
4	Transformer Bank Replacements and Substat	WD0670 STOVER REPL TB1 *10	2,000	1	Equipment	HVD Substation Transformer Replacement	Imminent Failure		Antrim	
5	Transformer Bank Replacements and Substat	WD1109 WACKERLY REPLACE TB NO.1 *10	2,494	1	Equipment	HVD Substation Transformer Replacement	Imminent Failure		Midland	
6	Transformer Bank Replacements and Substat	WD1323 ORCHARD ROAD RPL TB1 & TB2 *10	2,799	2	Equipment	HVD Substation Transformer Replacement	Imminent Failure		Midland	
7	Transformer Bank Replacements and Substat	WD1396 STEERING GEAR TB#1,2,3 FLRS *10	1,300	3	Equipment	HVD Substation Transformer Replacement	Imminent Failure		Saginaw	
8	Transformer Bank Replacements and Substat	WD1435 BORGESS REPL TB 1, TB2 *13*04	3,211	2	Equipment	HVD Substation Transformer Replacement	Imminent Failure		Kalamazoo	Complete
	Transformer Bank Replacements and Substat	WD1722 BUSKIRK NEW 138/46 KV BULK SUB*13	6,800							Permitting Complete Q4 2025 Construction Start Q4 2025 Construction Complete Q2 2026
9		Transformer Bank Replacements and Substat Alma Substations Rebuild (Armory)	4,000	1	Projects	HVD Substation Rebuilds	Customer*Minutes Avoided	78,624	Allegan	Complete Demolition of Wayland Sub Q3 2026 Property Acquisition On-Going Complete Design (Phase 1) Q1 2027 Construction Start (Phase 1) Q4 2027 Construction Complete (Phase 1) Q2 2028 Complete Design (Phase 2) Q3 2027
10		Transformer Bank Replacements and Substat Blackstone Substation Rebuild	5,287	1	Projects	HVD Substation Rebuilds	Benefit not realized until completion	-	Gratiot	Construction Complete (Phase 2) 2029 Complete Design Q4 2026 Complete Construction Procurement Q2 2027 Construction Start Q3 2027 Construction Complete Q4 2028
11		Transformer Bank Replacements and Substat	1,350	1	Projects	HVD Substation Rebuilds	Benefit not realized until completion	-	Jackson	
12	Transformer Bank Replacements and Substat	WD0755 DELTA COLLEGE RPL TB *02	270	2	Equipment	HVD Substation Transformer Replacement	Imminent Failure		2 Bay	
13	Transformer Bank Replacements and Substat	WD0755 DELTA COLLEGE INST MOBILE PAD *02	11844	1	Projects	HVD Substation Transformer Replacement	Imminent Failure		0 Bay	
14	Transformer Bank Replacements and Substat	Progress Payments for TRF	11844	30	Equipment	Major material procurement			Various	
15		Transformer Bank Replacements and Substation RebuildsTotal:	46,666							

MICHIGAN PUBLIC SERVICE COMMISSION
 Consumers Energy Company
 Distribution Projects
 Summary Projected Electric Capital Expenditures
 For the Bridge Period 16 Months Ending April 30th, 2026
 (\$000)

AG-CE-0487

Case No.: U-21870
 Exhibit No.: A-109 (MLH-3)
 Page: 11 of 13
 Witness: MLHayward
 Date: June 2025

Line No.	(a) Sub-Program	(b) Project Description, Line, Substation, or Location	(c) Projected Period Spending (Bridge)	(d) Units	(e) Unit Type	(f) Investment Category	Benefit Type	Location	STATUS
1	HVD Strategic Customers New Business	New 138 kV dedicated customer Substation in southern Michigan	6,140	1	Projects	HVD New Business	Meet Obligation To Serve Customers, Economic Development	Southern Michigan	Complete
2	HVD Strategic Customers New Business	New 138 kV dedicated customer Substation in northwest Michigan	4,340	1	Projects	HVD New Business	Meet Obligation To Serve Customers, Economic Development	Northwest Michigan	Cancelled
3	HVD Strategic Customers New Business	New 46 kV dedicated customer Substation in west Michigan	3,704	1	Projects	HVD New Business	Meet Obligation To Serve Customers, Economic Development	West Michigan	In Construction: Started Construction Q3 2024 Complete Q1 2026
4	HVD Strategic Customers New Business	New 138 kV dedicated customer Substation in east Michigan	20,758	1	Projects	HVD New Business	Meet Obligation To Serve Customers, Economic Development	East Michigan	In Construction: Started Construction Q1 2024 Complete Q3 2026
5	HVD Strategic Customers New Business	Two (2) new 138 kV dedicated customer Substations in west Michigan	24,789	2	Projects	HVD New Business	Meet Obligation To Serve Customers, Economic Development	West Michigan	In Construction: Started Construction Q1 2025 Complete Q4 2026
6	HVD Strategic Customers New Business	New 138 kV dedicated customer Substation in southeast Michigan	22,965	1	Projects	HVD New Business	Meet Obligation To Serve Customers, Economic Development	Southeast Michigan	Cancelled
7	HVD Strategic Customers New Business	High Probability Projects	7,349	1	Projects	HVD New Business	Meet Obligation To Serve Customers, Economic Development	N/A	
8		HVD Strategic Customers New Business Total	90,045						

MICHIGAN PUBLIC SERVICE COMMISSION

Consumers Energy Company

AG-CE-0487

Case No.: U-21870
 Exhibit No.: A-110 (MLH-4)
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 Witness: MLHayward
 Date: June 2025

Distribution Projects
 Summary Projected Electric Capital Expenditures
 For the Test Year 12 Months Ending April 30th, 2027
 (\$000)

Line No.	(a) Sub-Program	(b) Description, Line, Substation, or Lo	(c) Projected Period Spending (Test)	(d) Units	(e) Unit Type	(f) Investment Category	Benefit Type	Benefit	Location	STATUS
1	HVD Lines Reliability	Erie	307	8.0	Miles	Line Rebuilds	Customer*Minutes Avoided	204,608	Monroe County	Permitting Complete Q3 2025 Material Procurement Q4 2025 Construction Start Q4 2025 Construction Complete Q3 2026
2		Union City	303	7.9	Miles	Line Rebuilds	Customer*Minutes Avoided	0	Calhoun County	
3		Nashville	429	11.2	Miles	Line Rebuilds	Customer*Minutes Avoided	138,261	Barry County	
4		Merrill	658	4.6	Miles	Line Rebuilds	Customer*Minutes Avoided	43,206	Gration and Saginaw Counties	
5		Grand Valley	543	3.8	Miles	Line Rebuilds	Customer*Minutes Avoided	13,878	Kent County	
6		Walker	300	2.1	Miles	Line Rebuilds	Customer*Minutes Avoided	76,935	Kent County	
7		Hodenpyl	558	3.9	Miles	Line Rebuilds	Customer*Minutes Avoided	83,179	Wexford County	
8		Wirtz Rd	3,798	8.0	Miles	Line Rebuilds	Customer*Minutes Avoided	435,498	Gladwin County	Scoping Complete Q3 2025 Engineering Design Start Q3 2025 Engineering Design Complete Q2 2026 Construction Start Q4 2026 Construction Complete Q2 2027 Scoping Complete Q2 2025 Engineering Design Start Q3 2025 Engineering Design Complete Q2 2026 Construction Start Q4 2026 Construction Complete Q2 2027 Scoping Complete Q1 2023 Engineering Design Start Q3 2023 Engineering Design Complete Q3 2026 Construction Start Q1 2027 Construction Complete Q2 2027
9		Cement City	1,073	1.5	Miles	Line Rebuilds	Customer*Minutes Avoided	46,368	Vandercook	
10		Saranac	1,645	2.3	Miles	Line Rebuilds	Customer*Minutes Avoided	27,531	Clarksville	
11		Nashville	501	0.7	Miles	Line Rebuilds	Customer*Minutes Avoided	8,641	Hastings	
12		Nashville 2	17	0.0	Miles	Line Rebuilds	Customer*Minutes Avoided	0	Hastings	
13		Port Sheldon	358	0.5	Miles	Line Rebuilds	Customer*Minutes Avoided	3	Ottawa County	
14		Newaygo	431	0.3	Miles	Line Rebuilds	Customer*Minutes Avoided	5,830	Newaygo	
15		Lake Shore	2,310	0.8	Miles	Line Rebuilds	Customer*Minutes Avoided	6,284	Ottawa County	
16		Niagara	501	0.7	Miles	Line Rebuilds	Customer*Minutes Avoided	9,524	Saginaw	
17		Niagara 2	286	0.4	Miles	Line Rebuilds	Customer*Minutes Avoided	5,442	Saginaw	
18		Dietz - Gaylord	1,716	2	Miles	Line Rebuilds	Customer*Minutes Avoided	2,582	Boyer City	
19		Mt. Pleasant	2,717	4	Miles	Line Rebuilds	Customer*Minutes Avoided	187,082	Mount Pleasant	
20		Goodale	2,074	3	Miles	Line Rebuilds	Customer*Minutes Avoided	76,361	Battle Creek	
21		Alden	5,372	-	Miles	Line Rebuilds	Benefit not realized until completion in 2027	-	Antrim County	
22		Leslie	6,224	-	Miles	Line Rebuilds	Benefit not realized until completion in 2027	-	Jackson and Ingham Counties	
23		Morrice	3,622	-	Miles	Line Rebuilds	Benefit not realized until completion in 2027	-	Shiawasee County	
21		Mancelona	481	9.5	Miles	Pole Top Rehabilitation	Customer*Minutes Avoided	287,945	Antrim County	
22		Mancelona 2	593	11.7	Miles	Pole Top Rehabilitation	Customer*Minutes Avoided	354,627	Kalkaska County	
23		Carson City	904	17.0	Miles	Pole Top Rehabilitation	Customer*Minutes Avoided	607,526	Montcalm County	
24		Burr Oak	374	6.9	Miles	Pole Top Rehabilitation	Customer*Minutes Avoided	74,790	Burr Oak	
25		Indian River	584	9.6	Miles	Pole Top Rehabilitation	Customer*Minutes Avoided	176,834	Indian River	
26		Cannonsburg	483	4.7	Miles	Pole Top Rehabilitation	Customer*Minutes Avoided	78,326	Cannonsburg	
27		Merrill	627	6.1	Miles	Pole Top Rehabilitation	Customer*Minutes Avoided	114,589	Gration County	
28		Ovid	617	6.0	Miles	Pole Top Rehabilitation	Customer*Minutes Avoided	180,540	Elsie	
29		Oakwood	165	1.6	Miles	Pole Top Rehabilitation	Customer*Minutes Avoided	65,344	Kalamazoo	
30		Hanover	380	3.7	Miles	Pole Top Rehabilitation	Customer*Minutes Avoided	133,607	Spring Arbor	
31		Coleman	411	4.0	Miles	Pole Top Rehabilitation	Customer*Minutes Avoided	154,260	Midland County	
32		Silicon	401	3.9	Miles	Pole Top Rehabilitation	Customer*Minutes Avoided	63,648	Freeland	
33		Pentwater	165	1.6	Miles	Pole Top Rehabilitation	Customer*Minutes Avoided	27,800	Ludington	
34		Squires	103	1.0	Miles	Pole Top Rehabilitation	Customer*Minutes Avoided	23,280	Hillsdale	

35	Glen Oaks	329	3.2 Miles	Pole Top Rehabilitation Customer*Minutes Avoided	53,965	Centreville
36	Eaton Rapids	514	5.0 Miles	Pole Top Rehabilitation Customer*Minutes Avoided	133,175	Eaton County
37	Eaton Rapids 2	411	4.0 Miles	Pole Top Rehabilitation Customer*Minutes Avoided	106,540	Springport
38	Boardman - Hodenpyl	545	5.3 Miles	Pole Top Rehabilitation Customer*Minutes Avoided	187,594	Mesick
39	Kent City	175	1.7 Miles	Pole Top Rehabilitation Customer*Minutes Avoided	42,432	Kent City
40	Stadium	253	2.8 Miles	Pole Top Rehabilitation Customer*Minutes Avoided	31,766	Kalamazoo
41	Dort - AC	247	2.4 Miles	Pole Top Rehabilitation Customer*Minutes Avoided	121,452	Genesee County
42	Greenville	154	1.5 Miles	Pole Top Rehabilitation Customer*Minutes Avoided	42,090	Greenville
43	Greenville 2	175	1.7 Miles	Pole Top Rehabilitation Customer*Minutes Avoided	23,851	Greenville
44	Greenville 3	123	1.2 Miles	Pole Top Rehabilitation Customer*Minutes Avoided	16,836	Greenville
45	Getty	588	- Miles	Pole Top Rehabilitation completion in 2027 Benefit not realized until	-	Muskegon
46	Ithaca	545	- Miles	Pole Top Rehabilitation completion in 2027 Benefit not realized until	-	Ashley
47	Ithaca 2	152	- Miles	Pole Top Rehabilitation completion in 2027 Benefit not realized until	-	Ithaca
48	Frost	89	- Miles	Pole Top Rehabilitation completion in 2027 Benefit not realized until	-	Clare County
49	Frost 2	1,408	- Miles	Pole Top Rehabilitation completion in 2027	-	Clare County
50	Pole Replacements	33,569	1230 Poles	Pole Replacements Customer*Minutes Avoided	1,574,016	Various locations statewide
51	Switch Replacements	7,942	55 Switches	Switch Replacements Customer*Minutes Avoided	56,306	Various locations statewide
52	Pole Top Assembly Replacement	5,658	600 PTAs	Pole Top Assembly Rep Customer*Minutes Avoided	1,462,500	
53	Line Sensors	1,759	140 Projects	Line Sensor Deploymer Improve reliability through increased outage dete		Various locations statewide
54	Real Estate	11,000		Right of Way Acquisitic Procure Right of Way needed to support projects		Various locations statewide
55	HVD Lines Reliability Total	107,667				

MICHIGAN PUBLIC SERVICE COMMISSION

Consumers Energy Company

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2025-2026 Test Year LVD Project List

For the Test Year 12 Months Ending April 30, 2027

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Case No.: U-21870

Exhibit No.: A-110 (MLH-4)

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Witness: MLHayward

Date: June 2025

Line No.	(a) Sub-Program	(b) Project Description, Line, Substation, or Location	(c) Projected Period Spending	(d) Units	(e) Unit Type	(f) Investment Category	(g) Location	(h) Benefit Type	(i) Benefit	STATUS
	Reliability									
1	Metro Rehabilitation	MASONIC TEMPLE VAULT	500	1	Project	Vault or Manhole Rehabilitation	Grand Rapids	Customer-outage-minutes avoided	1,759	
2		BECKER VAULT	500	1	Project	Vault or Manhole Rehabilitation	Grand Rapids	Customer-outage-minutes avoided	3,519	
		WASHINGTON AVE CIVIL	3,600							Engineering Design:
3				1	Project	Crushed Duct	Saginaw	Customer-outage-minutes avoided	-	Design Start Q3 2025
4		WASHINGTON AVE ELEC	1,393	1	Project	Crushed Duct	Saginaw	Customer-outage-minutes avoided	148,272	Design Complete Q1 2026
5		Metro Rehabilitation Total	5,993							

MICHIGAN PUBLIC SERVICE COMMISSION

Consumers Energy Company

Distribution Projects

Summary Projected Electric Capital Expenditures

For the Test Year 12 Months Ending April 30th, 2027

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Case No.: U-21870

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Witness: MLHayward

Date: June 2025

Line No.	(a) Sub-Program	(b) Project Description, Line, Substation, or Location	(c) Projected Period Spending (Test)	(d) Units	(e) Unit Type	(f) Investment Category	Benefit Type	Benefit	Location	STATUS
1	HVD Lines and Subs Capacity	Saginaw River Bank Replacement	2,622	1	Projects	Improved Functionality	Replace to Standard location/increase capacity/reliability	N/A	Saginaw Co.	
2	HVD Lines and Subs Capacity	LN028J BATH RBLD 0.96 MILES 3/0 % *05	600	1	Projects	Improved Functionality	Increase Capacity and Operational Flexibility	N/A	Ingham Co.	
3	HVD Lines and Subs Capacity	Looking Glass Working Space	811	1	Projects	Improved Functionality	Regulatory Compliance	N/A	Clinton Co.	
4	HVD Lines and Subs Capacity	Deja Working Space	567	1	Projects	Improved Functionality	Regulatory Compliance	N/A	Montcalm Co.	
5	HVD Lines and Subs Capacity	Verona Working Space	1,033	1	Projects	Improved Functionality	Regulatory Compliance	N/A	Calhoun Co.	
6	HVD Lines and Subs Capacity	Barry Working Space	44	1	Projects	Improved Functionality	Regulatory Compliance	N/A	Barry Co.	
7	HVD Lines and Subs Capacity	Felch Rd Working Space	346	1	Projects	Improved Functionality	Regulatory Compliance	N/A	Newaygo Co.	
8	HVD Lines and Subs Capacity	Gaylord Working Space	374	1	Projects	Improved Functionality	Regulatory Compliance	N/A	Otsego Co.	
9	HVD Lines and Subs Capacity	Delaney Working Space	121	1	Projects	Improved Functionality	Regulatory Compliance	N/A	Genesee Co.	
10	HVD Lines and Subs Capacity	Pasadena Working Space	369	1	Projects	Improved Functionality	Regulatory Compliance	N/A	Genesee Co.	
11	HVD Lines and Subs Capacity	Eureka Working Space	335	1	Projects	Improved Functionality	Regulatory Compliance	N/A	Montcalm Co.	
12	HVD Lines and Subs Capacity	Spaulding Working Space	219	1	Projects	Improved Functionality	Regulatory Compliance	N/A	Kent Co.	
13	HVD Lines and Subs Capacity	LN111A SARANAC RBLD 4.5 MI 46 KV % *07	1,644	1	Projects	Load Carrying Capability and Voltage Support	Mitigate Inadequate Clearance, increase capacity	N/A	Ionia Co.	
	HVD Lines and Subs Capacity	Linden 46 kV Line Rebuild (Halsey - Oakland)	5,100							Complete Scope Q3 2025 Start Design Q4 2025 Complete Q1 2026
14				1	Projects	Load Carrying Capability and Voltage Support	Avoid Overloads/Increase Capacity	N/A	Genesee Co.	
15	HVD Lines and Subs Capacity	Baker 138/46kV Substation (Crandall)	957	1	Projects	Load Carrying Capability and Voltage Support	Avoid Overloads and low voltage/cust-min saved	703,507	Van Buren Co.	
16	HVD Lines and Subs Capacity	LN119AD Hammond Rd R/W	667	1	Projects	Right of Way	Procure Right of Way needed to support projects	N/A	Grand Traverse Co.	
17	HVD Lines and Subs Capacity	LN032F UNION ST 46KV LINE R/W	800	1	Projects	Right of Way	Procure Right of Way needed to support projects	N/A	Grand Traverse Co.	
18	HVD Lines and Subs Capacity	Walker 46 kV Line R/W Tree Rights	233	1	Projects	Right of Way	Procure Right of Way needed to support projects	N/A	Kent Co.	
19	HVD Lines and Subs Capacity	Real Estate and R/W support	3,379	N/A	Projects	Right of Way	Procure Right of Way needed to support projects	N/A	Statewide	
20	HVD Lines and Subs Capacity	WD0285 Claremont INST CKT SWR	833	1	Projects	Transmission Coordination	Meet Contractual Requirements	N/A	Saginaw Co.	
21	HVD Lines and Subs Capacity	LN100AB BENSTON SPUR 1.8 MI 138KV LN *08	957	1	Projects	Transmission Coordination	Meet Contractual Requirements	N/A	Muskegon Co.	
22	HVD Lines and Subs Capacity	Cobb-Dupont-White Lake Rebuild (taps for Nugent Sand, Becker, & Club)	243	1	Projects	Transmission Coordination	Meet Contractual Requirements	N/A	Muskegon Co.	
23	HVD Lines and Subs Capacity	Wexford Relaying Upgrades Port Sheldon Substation - Replace 199 MOABS-SOGS with 138 kV Circuit	602	1	Projects	Transmission Coordination	Meet Contractual Requirements	N/A	Wexford Co.	
24	HVD Lines and Subs Capacity	Switcher and Relay Installation (METC)	1,474	1	Projects	Transmission Coordination	Meet Contractual Requirements	N/A	Ottawa Co.	
	HVD Lines and Subs Capacity	Wealthy Street Substation - New METC Snowy Station Coordination	3,070							Complete Scope Q3 2025 Start Design Q2 2026 Complete Q1 2027
25				1	Projects	Transmission Coordination	Meet Contractual Requirements	N/A	Kent Co.	
26	HVD Lines and Subs Capacity	WD0266 ISLAND RD INST CKT SWRS METC *05	1,395	1	Projects	Transmission Coordination	Meet Contractual Requirements	N/A	Eaton Co.	
27	HVD Lines and Subs Capacity	Summerton Relay Replacement - METC Coord	617	1	Projects	Transmission Coordination	Meet Contractual Requirements	N/A	Isabella Co.	
28	HVD Lines and Subs Capacity	WD0565 HOLLAND ROAD INSTALL AUX CTS *05	35	1	Projects	Transmission Coordination	Meet Contractual Requirements	N/A	Saginaw Co.	
		HVD Lines and Substations Capacity Total	29,447							

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Consumers Energy Company
 Distribution Projects
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Line No.	(a) Sub-Program	(b) Project Description, Line, Substation, or Location	(c) Projected Period Spending (Test)	(d) Units	(e) Unit Type	(f) Investment Category	Benefit Type	Location	STATUS
1	HVD Strategic Customers New Business	New 138 kV dedicated customer Substation in East michigan	2,099	1	Projects	HVD New Business	Meet Obligation To Serve Customers, Economic Development	East Michigan	In Construction; Started Construction Q1 2025 Complete Q4 2026
2	HVD Strategic Customers New Business	New 138 kV dedicated customer Substations in west michigan	14,672	1	Projects	HVD New Business	Meet Obligation To Serve Customers, Economic Development	West Michigan	
3	HVD Strategic Customers New Business	New 138 kV dedicated customer Substation in northern michigan	2,550	1	Projects	HVD New Business	Meet Obligation To Serve Customers, Economic Development	Northern Michigan	
4	HVD Strategic Customers New Business	Customer Contribution (New 138 kV customer Substation in northern michigan)	(2,550)	n/a	Projects	HVD New Business	Meet Obligation To Serve Customers, Economic Development	Northern Michigan	
5	HVD Strategic Customers New Business	New 138 kV dedicated customer Substation in southeast Michigan	20,619	1	Projects	HVD New Business	Meet Obligation To Serve Customers, Economic Development	Southeast Michigan	Cancelled
6	HVD Strategic Customers New Business	High Probability Projects	6,470	1	Projects	HVD New Business	Meet Obligation To Serve Customers, Economic Development	N/A	
7		HVD Strategic Customers New Business Total	43,860						

MICHIGAN PUBLIC SERVICE COMMISSION

Consumers Energy Company

AG-CE-0487

2025-2026 Test Year LVD Project List

For the Test Year 12 Months Ending April 30, 2027

(\$000)

Case No.: U-21870

Exhibit No.: A-110 (MLH-4)

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Witness: MLHayward

Date: June 2025

Line No.	(a) Sub-Program	(b) Project Description, Line, Substation, or Local	(c) Projected Period Spending	(d) Units	(e) Unit Type	(f) Investment Category	(g) Location	(h) Benefit Type	(i) Benefit	STATUS
Asset Relocations										
1	Metro Relocations	WEALTHY ST (QUICKSILVER) CIVIL	2,500	1	Project	Metro Relocations	Grand Rapids	Substation Coordination; customers impacted	TBD	
2		WEALTHY ST (QUICKSILVER) ELEC	1,500	1	Project	Metro Relocations	Grand Rapids	Substation Coordination; customers impacted	TBD	
3		FRONT AVE; MT VERNON TO PEARL CIVIL	2,000	1	Project	Metro Relocations	Grand Rapids	Coordination of Utilities; customers impacted		3
4		FRONT AVE; MT VERNON TO PEARL ELEC	1,000	1	Project	Metro Relocations	Grand Rapids	Coordination of Utilities; customers impacted		3
5		FRONT AVE; WEALTHY TO CSX RR CIVIL\$	0	1	Project	Metro Relocations	Grand Rapids	Coordination of Utilities; customers impacted; Reimbursible	TBD	
6		FRONT AVE; WEALTHY TO CSX RR ELEC\$	0	1	Project	Metro Relocations	Grand Rapids	Coordination of Utilities; customers impacted; Reimbursible	TBD	
		KALAMAZOO AVE CIVIL	7,000							Engineering Design:
7				1	Project	Metro Relocations	Kalamazoo	Coordination of Utilities; customers impacted		21
		KALAMAZOO AVE ELEC	3,000							Design Start Q3 2025 Design Complete Q1 2026 Engineering Design:
8				1	Project	Metro Relocations	Kalamazoo	Coordination of Utilities; customers impacted		21
9		CORPORATION ALLEY CASTINGS	30	1	Project	Metro Relocations	Kalamazoo	Coordination of Utilities; customers impacted		35
10		SAGINAW MEDICAL DIAMOND ELEC\$ PH 1	0	1	Project	Metro Relocations	Saginaw	Coordination of Utilities; customers impacted; Reimbursible		11
11		SAGINAW MEDICAL DIAMOND ELEC PH 2	200	1	Project	Metro Relocations	Saginaw	Coordination of Utilities; customers impacted		3
12		SAGINAW MEDICAL DIAMOND ELEC PH 3	610	1	Project	Metro Relocations	Saginaw	Coordination of Utilities; customers impacted		14
13		MICHIGAN AVE CIVIL	2,565	1	Project	Metro Relocations	Kalamazoo	Coordination of Utilities; customers impacted		274
14		Metro Relocations Total	20,405							

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Question:

159. Refer to Figure 58 on page 139 of Ms. Hayward's direct testimony on HVD Strategic Customers capex. Please:

- a. Expand this table to include the same information for each year 2021-2024 actual and forecasted for 2025, 2026, 2027. Provide it in Excel.
- b. For each customer project, provide the type of business the customer is involved in, the business location, the contract status (whether signed or not), the phase the project is currently in (scoping, conceptual design, engineering design, construction, completed), the project cost by year from inception to completion with and without any CIAC, and what facilities will be installed.
- c. For each customer project, provide a copy of the signed contract and explain what provisions have been included in the contract for reimbursement of capital expenditures and O&M expenses incurred by the Company in case the customer abandons the project before completion of construction and also subsequent to start of operations but before the Company has recovered the full investment in the project.

Response:

Objection of Counsel: Consumers Energy Company objects to this discovery request because it requests information that is not relevant and that is personally identifiable Customer Account information that cannot be disclosed under Consumers Energy's Customer Data Privacy tariff. Subject to this objection, Consumers Energy responds as follows:

- a.) For 2021-2024 actuals, see Exhibit A-130 (MPK-20), page 1, lines 3-4, Lines Strategic Customers-HVD. See Attachment 1 to this response for 2025-2027 forecasted.
- b.) See objection noted above for the type of business and business location requested. See Attachment 2 to this response for the rest of the information requested in part b.
- c.) Please see confidential attachments 3a, 3b, 4, 5, 6, 7, 8, 9, and 10 for copies of the signed contracts. It can be explained that the Company's contracts with customers depending on the type of contract have minimum billing requirements for certain energy usages and terms, and/or provisions for prorated payment of investments if the customer ceases operation prior to the end of the term of the contract. Additionally, the Company performs risk reviews on projects over \$1M and may require additional security (e.g. a letter of credit or parental guaranty) as a result of the review.

Witness: Megan L. Hayward**Date:** September 16, 2025

CECo Response to AG-CE-0478

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Hayward Attachment 1
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Project Description, Line, Substation, or Location	Contract Status (Signed, or Not Signed)	Current phase of each project	Cost by year from inception to completion (in 1000s)						Amount of CIAC	What facilities will be installed
			2023 (A)	2024 (A)	2025 (F)	2026 (F)	2027 (F)	2028 (F)		
		ex. scoping, conceptual analysis, engineering design, out for bid, construction, completed							CIAC = incentive not paid upfront by the customer in lieu of min demand contract	
New 138 kV dedicated customer Substation in southern Michigan	Signed	Complete	4,623	14,169	2,975	170	-	-	CIAC is not applicable as this was an LEHR contract	138 kV dedicated customer, two transformer substation, and two 138 kV line connections
New 138 kV dedicated customer Substation in northwest Michigan	Signed	Cancelled	1,700	4,141	7,974	-	-	-	CIAC is not applicable as this was an LEHR contract	N/A, cancelled
New 46 kV dedicated customer Substation in west Michigan	Signed	Construction	26	7,510	4,725	-	-	-	CIAC=5,772,870; Customer Deposit Subject to Refund = 2,327,130	46 kV dedicated customer, two transformer substation, two 46 kV connections to new 46 kV switching station
New 138 kV dedicated customer Substation in east Michigan	Signed	Construction	94	18,381	19,424	3,275	-	-	CIAC is not applicable as this was an LEHR contract	138 kV dedicated customer, four transformer substation, and four 138 kV line connections
Two (2) new 138 kV dedicated customer Substations in west Michigan	Signed	Construction	-	11,694	13,363	24,826	-	-	CIAC is not applicable as this was an LEHR contract	138 kV dedicated customer, two transformer substation, with two 138 kV line connections, and a 138 kV three transformer substation, with three 138 kV line connections
New 138 kV dedicated customer Substation in southeast Michigan	Not Signed	Cancelled	-	1,772	8,678	-	-	-	CIAC is not applicable proposed LEHR contract	N/A, cancelled
New 138 kV dedicated customer Substation in northern Michigan	Signed	Scoping/long lead material procurement	27	1	9	2,550	-	-	CIAC is not applicable, Customer Deposit Subject to Refund = \$2,550,000	138 kV dedicated customer, single transformer substation, and single 138 kV line connection
Recently Signed High Probability Project - New 46 kV dedicated customer Substation in east Michigan	Signed	Scoping/long lead material procurement	-	-	974 + (974)=0	1061 + (1061)=0	1830 + (1830)=0	2123 + (1548) =575	CIAC=575,125; Customer Contribution = 5,412,875 (shown as (XXXX) offsetting planned cost)	46 kV dedicated customer, single transformer substation, and single 46 kV line connection
Recently Signed High Probability Project - New 46 kV connection to new Customer Owned dedicated Substation in west Michigan	Signed	Scoping/long lead material procurement	-	-	328	766			Customer Deposit Subject to Refund = 1,094,000	46 kV line connection, overhead to underground, to customer owned dedicated customer substation

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Question:

160. Refer to lines 1-16 on page 140 of Ms. Hayward's direct testimony on HVD Strategic Customers capex. Please:

- a. Provide the status on the receipt of the project cost reimbursement from the prospective customer.
- b. Provide the amount charged to the plant account and rate base for the cancelled project.
- c. Provide the amount billed to the customer for reimbursement.
- d. Explain why the company retained the cost of the cancelled project in the plant account and rate base, given that it is not used or useful, instead of recording that amount as an account receivable owed by the prospective customer.

Response:

- a) The Company has sent formal notification of contract termination and an invoice seeking payment for work performed under the contracts, materials that cannot be salvaged/re-purposed, and all reasonable cancellation expenses incurred to provide service. The Company is currently under negotiations with the prospective customer regarding the submitted invoice; to date, the Company has not received payment.
- b) To date there has been \$11,580,467.23 charged to construction work in progress (CWIP) for the project. The Company is currently in the process of cancelling the work orders and evaluating salvage/re-purpose opportunities. Once any salvage/re-purpose transfers have occurred, any remaining dollars spent on this project would be moved from CWIP to O&M expense.
- c) The amount billed to the customer per the invoice mentioned in part (a) was \$2,550,605.
- d) The Company included an amount in this filing within the sub-program, as cancellation occurred very shortly before the filing and the process to proceed with cancellation activities, including evaluating equipment for salvage/re-purpose, and removing charges from the work orders and sub-program accounting was not yet started at the time of this filing and is still in progress as of today. The amounts estimated to be charged to the project were included to maintain the sub-program total cashflow accurate with the actual cashflow occurring, but with the intention that those investments will be netted out in the future via salvage/re-purpose of equipment, eventual payment from the customer, and transfer to O&M expense.

Witness: Megan L. Hayward**Date:** September 16, 2025

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Question:

161. Refer to lines 17-23 on page 140 and lines 1-15 on page 141 of Ms. Hayward's direct testimony on HVD Strategic Customers capex. Please:

- a. For any specific customer projects included on page 11, line 7, of Exhibits A-109 and A-110 where a contract has been signed with the customer, provide the type of business the customer is involved in, the business location, the contract status, whether signed or not, the phase the project is currently in (scoping, conceptual design, engineering design, construction, completed, etc.), the project cost by year from inception to completion with and without any CIAC, and what facilities will be installed.
- b. Explain why it is prudent for the Company to incur capital expenditures on any of these projects before the customer has signed a contract with the Company.

Response:

Objection of Counsel: Consumers Energy Company objects to this discovery request because it requests information that is not relevant and that is personally identifiable Customer Account Information that cannot be disclosed under Consumers Energy's Customer Data Privacy tariff. Subject to this objection, Consumers Energy's response is as follow:

- a) See objection noted above for the type of business, and business location requested. See U21870-AG-CE-0478_Hayward_Attachment_2.xls to the response provided for U21870-AG-CE-478, which includes two projects that have been signed since this case was filed and make up a portion of the High Probability Projects line items in both Exhibits A-109 and A-110, and are labeled as such in that attachment.
- b) The reasonableness of these projects is discussed in my direct testimony, page 140, lines 17-23, and pages 141-143. Additionally, any work completed and equipment ordered for these projects is also useful for other future projects and enables the Company to be better positioned to accommodate and gain commitment from other prospective large customer projects.

Witness: Megan L. Hayward
Date: [Insert Date]

U21870-AG-CE-0541

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Question:

218. Refer to Figure 3 on page 14 of Mr. McPhail's direct testimony on Distribution Circuit Modernization. Please:

- a. Expand this table to include the same information for each year 2021 to 2024 and forecasted for 2025, 2026, 2027. Provide it in Excel.
- b. Provide the number of units for each line item for each year 2021-2027, the bridge period, and the projected test year in Excel.
- c. Provide the cost/benefit analysis for Line Sensors, Voltage Regulator Controllers, Peer to Peer Automation, and Metro Modernization showing that these programs and installations are economically advantageous.

Response:

Objection of Counsel: Consumers Energy Company objects to this discovery request because it is unclear what is meant by "economically advantageous." Without waiving this objection, Consumers Energy responds as follows:

- a. Please see attached Excel file "U21870-AG-CE-0541_Mcphail_ATT_a_b.xlsx"
- b. Please see attached Excel file "U21870-AG-CE-0541_Mcphail_ATT_a_b.xlsx"
- c. The benefits for Line Sensors can be found in Exhibit A-144 (SAM-3) and is covered on page 16 lines 16-18 of my direct testimony. Investments in the electric grid are not made solely for economic reasons but to improve service to customers through better reliability. A reduced Customer Minute Interruption (CMI) was calculated in the analysis resulting in improved reliability for customers.

The BCA for Voltage Regulator Controllers can be found in Exhibit A-146 (SAM-5). The "Benefits & Costs Data" provides an NPV.

The benefits for Peer-to-Peer Automation can be found in Exhibit A-148 (SAM-7) and is discussed on page 33, beginning on line 22 of my direct testimony. Investments in the electric grid are not made solely for economic reasons but to improve service to customers through better reliability. A reduced CMI was calculated in the analysis resulting in improved reliability for customers.

The benefits for Metro Modernization can be found in Exhibit A-151 (SAM-10) and is discussed on page 41 lines 1 through 8. Investments in the electric grid are not made solely for economic reasons but to improve service to customers through better reliability and in this case, reduce exposure of our co-workers resulting in safer operations. A reduced CMI was calculated in the analysis resulting in improved reliability for customers.

Witness: Scott A. Mcphail

Date: September 15, 2025

CECo Response to AG-CE-0541

Distribution Circuit Modernization Investment Category (\$000)	2021	2022	2023	2024	2025	2026	2027
Deployment Projects							
Line Sensors	\$ 8,086	\$ 3,519	\$ 5,970	\$ 10,831	\$ 6,116	\$ -	\$ -
Voltage Regulator Controllers	\$ 6,359	\$ 5,645	\$ 3,144	\$ 3,501	\$ 7,877	\$ 7,769	\$ -
Technology Enablement Projects							
NOVA TS Comms	\$ -	\$ -	\$ -	\$ -	\$ 20	\$ -	\$ -
Line Recloser Modernization	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 135	\$ 50
Peer-Peer Automation	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 895	\$ 270
Supplemental Line Sensors	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 60	\$ 115
Metro Modernization	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 305	\$ 650
Remote-Capable Switches	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 45

Distribution Circuit Modernization Investment Category	2021	2022	2023	2024	2025	2026	2027	Bridge Period (Jan '25 - Apr '26)	Test Year (May '26 - Apr '27)
Deployment Projects									
Line Sensors	1,700	2,342	2,379	2,979	1,000	-	-	1,000	-
Voltage Regulator Controllers	162	367	160	156	220	217	-	294	143
Technology Enablement Projects									
NOVA TS Comms	-	-	-	-	3	-	-	3	-
Line Recloser Modernization	-	-	-	-	-	6	2	-	8
Peer-Peer Automation	-	-	-	-	-	1	1	-	2
Supplemental Line Sensors	-	-	-	-	-	-	30	-	30
Metro Modernization	-	-	-	-	-	-	2	-	2
Remote-Capable Switches	-	-	-	-	-	-	6	-	6

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Question:

221. Refer to Figure 9 and pages 51 and 52 of Mr. McPhail's direct testimony on Asset Repository and the Asset Performance Management. Please:

- a. Provide the original forecasted total cost for each system by year from inception to completion for capex and O&M expense separately.
- b. Provide the current forecasted total cost for each system by year from inception to completion for capex and O&M expense separately. Provide also the O&M expense for the projected test year.
- c. The discussion on lines 3-17 does not explain why the project costs increased by \$12 million. It seems to explain a reduction in costs of \$3.3 million by developing the APM in-house instead of purchasing a system. Provide a complete explanation of the \$12 million increase, what specifically happened, and what does the increase pertain to.
- d. Identify what data quality problems the Company discovered, why it prevented a system purchase, and how those problems get resolved with an in-house system development.
- e. What do you mean by the statement that the Company's asset maturity continues to improve.
- f. Provide the current phase of project development for each of the two systems and provide the month and year when the detailed requirements phase for each system was completed or will be completed.
- g. Provide the name of the vendor or system developer for each system, when this vendor or developer was selected.
- h. Provide a copy of the Request for Proposal issued and the list of vendors contacted with a copy of the analysis showing the vendor selected and why it was selected.
- i. Refer to Exhibit A-152. The Excel version of the exhibit shows dollar amounts for benefits with no source calculation of the basis how those amounts were determined. Please provide the detailed components of the benefits by year with the supporting basis and explanations showing how they were determined.

Response:

- a. Please see Excel spreadsheet "U21870-AG-CE-0544_Mcphail_ATT_a_b.xlsx" tab U21870-AG-CE-0544a.
- b. Please see Excel spreadsheet "U21870-AG-CE-0544_Mcphail_ATT_a_b.xlsx" tab U21870-AG-CE-0544b.
- c. My testimony did not cover the costs of the overall program from the beginning to 2035. However, in review of what has already been spent on this DistAM program in my testimony on page 51 line 6, the Company has invested \$7.9 million. Adding the \$7.9 million to the estimated

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costs located in the provided BCA in this response "U21870-AG-CE-0544_Mcphail_Exhibit A-152_expanded.xlsx" of \$16.2 million out to 2035, this equates to \$24.1 million.

To complete the build of the AR and APM the total capital costs are listed in the Excel spreadsheet "U21870-AG-CE-0544_Mcphail_Exhibit A-152_expanded.xlsx" tab "Cost Details" lines 12 and 22 respectfully.

The avoided costs of \$3.3 million comes from the difference in what a vendor provided APM would cost (\$7.5 million) versus the lower cost to develop the APM in house (\$4.2 million). The Company did uncover an error in the "Cost Details" tab in Exhibit A-152. Please see "U21870-AG-CE-0544_Mcphail_Exhibit A-152_expanded.xlsx" on the "Cost Details" tab. Highlighted in yellow these numbers were lowered from my original submission to reflect the in-house development costs of the APM. This update did improve the NPV shown on the "Benefits & Costs Data" tab. Furthermore, the \$1 million in savings/benefits stated on page 52 line 12 from building a solution in house was not included in the BCA.

The initial capital estimate was based on early planning assumptions. As the project progressed, the system architecture proved more complex and costly than anticipated, requiring additional investment in integration, analytics, and infrastructure. Additionally, the Software-as-a-Service (SaaS) model for the Asset Investment Planning (AIP) tool was higher than originally forecasted.

The go forward cost of the program shown in the BCA is from 2025 into the future, going beyond the bridge year and test period.

- d. Some of the data quality problems stem from having disparate databases that have an incomplete record, for the purposes of this project. Examples include but are not limited to: no known manufacturer of the asset, manufacture date, and year installed. Without this data it will be difficult to perform predictive analytics to determine a health score. Instead, the Company chose to build the APM asset by asset. Each asset has different characteristics pertinent to that asset. Developing the APM asset by asset will allow the Company to tailor the predictive health score to the unique asset. A method being used to close this gap in data quality is using AI image analysis. The Company performs regular inspections on its circuits with both Engineers/Planners and drones. The pictures captured through that process will be run through AI image model to produce some of this missing data needed for the APM. With an in-house APM solution, we can build asset health scores incrementally while improving asset data quality.
- e. As noted in part (d), the Company anticipates that overall asset data maturity will strengthen as data quality is improved and development activities are executed incrementally on an asset-by-asset basis. This approach is expected to yield a progressively larger volume of higher-quality asset information over time.

f.

System	Current Phase	Current Phase End Date
Asset Repository	Asset Integration - Poles	10/2025
APM	Planning	4/2026

- g. The system developer for the Asset Repository system is in-house and was selected on 6/27/2023. The system developer for the APM system is in-house and was selected on 6/1/2025.
- h. The Company did not submit an RFP for the Asset Repository or APM but did receive estimates from vendors and benchmarking on the cost of an APM.
- i. Please see Excel spreadsheet "U21870-AG-CE-0544_Mcphail_A-152_expanded.xlsx" on the "Benefits Detail" and the "Assumptions & Calculations" tab. These were determined through Company knowledge, records, and prior collaboration with a consultant.

The annual and total benefits are broken down into five categories:

- 1) Reduced Avoided Capital Costs - Annual Deferred Savings & Depreciation
- 2) Reduced Avoided O&M Costs - Avoided O&M from Reduced Failures
- 3) Avoided Restoration Costs - Reliability Value from Outages Avoided
- 4) Improved Power Quality - Societal Impacts/Customer Risk
- 5) Reliability Degradation Risk - Reliability Value from Degradation Risk

For each year, the potential benefit for each category is calculated using vendor supplied formulas that incorporate asset coverage, health, and data quality improvements.

A central metric in translating these technical improvements into financial benefits is the APM Effective Percentage, which is calculated annually as the product of asset health coverage and asset data quality percentage. This effectiveness percentage represents the proportion of assets for which the benefits can be realized, given the current state of coverage and data quality. In the benefit calculations, the annual potential benefit for each category is multiplied by the corresponding year's effectiveness percentage, ensuring that only the share of benefits attributable to assets that are both covered and have improved data quality is counted each year. As effectiveness percentage increases over time, a larger portion of the potential benefit is realized and summed in the totals.

Witness: Scott A. Mcphail
Date: September 16, 2025

CECo Response to AG-CE-0544

Original Estimate (\$000) Calendar Year	2022		2023		2024		2025		2026		2027		2028		2029		Total	
	Cap	O&M	Cap	O&M	Cap	O&M	Cap	O&M	Cap	O&M	Cap	O&M	Cap	O&M	Cap	O&M	Cap	O&M
Asset Repository	\$ 282	\$ 414	\$ 300	\$ 108	\$ -	\$ -	\$ 500	\$ 100	\$ 500	\$ 270							\$ 1,582	\$ 892
Asset Performance Management	\$ -	\$ -	\$ -	\$ -	\$ 200	\$ 200	\$ 6,525	\$ 600	\$ 3,706	\$ -							\$ 10,431	\$ 800
Asset Investment Planning	\$ -	\$ -	\$ -	\$ -	\$ 3,675	\$ 85	\$ 369	\$ 40	\$ -	\$ 40	\$ -						\$ 4,044	\$ 165
Total	\$ 282	\$ 414	\$ 300	\$ 108	\$ 3,875	\$ 285	\$ 7,394	\$ 740	\$ 4,206	\$ 310							\$ 16,057	\$ 1,857

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Updated Estimate (\$000) Calendar Year	2022 (Actuals)		2023 (Actuals)		2024 (Actuals)		2025		2026		2027		2028		2029		Total	
	Cap	O&M	Cap	O&M	Cap	O&M	Cap	O&M	Cap	O&M	Cap	O&M	Cap	O&M	Cap	O&M	Cap	O&M
Asset Repository	\$ 282	\$ 414	\$ 300	\$ 108	\$ 1,611	\$ 30	\$ 2,804	\$ 56	\$ 1,404	\$ 28	\$ 1,404	\$ 28	\$ 351	\$ 7	\$ -	\$ -	\$ 8,156	\$ 671
Asset Performance Management	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 527	\$ 11	\$ 702	\$ 14	\$ 2,930	\$ 60	\$ -	\$ -	\$ -	\$ -	\$ 4,159	\$ 85
Asset Investment Planning	\$ -	\$ -	\$ 1,501	\$ 51	\$ 4,278	\$ 54	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5,779	\$ 105
Device Management	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,053	\$ 21	\$ 1,404	\$ 28	\$ 2,457	\$ 49
Total	\$ 282	\$ 414	\$ 1,801	\$ 159	\$ 5,889	\$ 84	\$ 3,331	\$ 67	\$ 2,106	\$ 42	\$ 4,334	\$ 88	\$ 1,404	\$ 28	\$ 1,404	\$ 28	\$ 20,551	\$ 910
O&M Expense (\$000)																		
O&M Expense for test year May '26 - Apr '27																		
Asset Repository	\$ 28																	
Asset Performance Management	\$ 53																	
Asset Investment Planning	\$ -																	
Device Management	\$ -																	

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Question:

222. Refer to pages 52 to 56 of Mr. McPhail's direct testimony on the Asset Repository system. Please:

- a. Explain how the Company currently keeps track of distribution assets. Identify the current system, the information retained within the current system, and provide a list of additional information that the new system will capture that the current system does not.
- b. Identify what additional value the Company will obtain from the new Asset Repository system that cannot be obtained from the current asset detail repository system.
- c. Explain why the current repository system cannot provide a single source of truth for asset information. Why is the Company keeping different sources of truth now?
- d. Explain why the Company did not prepare a separate present value cost/benefit analysis for the new Asset Repository system.
- e. Provide a separate calculation of the present value of the cost and benefits for the Asset Repository in Excel with formulas intact.
- f. Provide the estimated financial benefits that the Company expects from implementation of the Asset Repository system by year in Excel showing the source of each of those benefits and the basis of how they were determined.
- g. If the Asset Repository system is the foundational component of the distribution asset management strategy, explain how the Company could function and operate its distribution system up to now without the Asset Repository in place.
- h. Provide any evidence that the Company has gathered from other electric utilities that the Asset Repository system implemented by those utilities has created significant financial and non-financial benefits well in excess of the cost of the system. Identify also the utilities and when their system was implemented.

Response:

- a. The Company tracks distribution asset information across several enterprise software systems, including but not limited to SAP, GIS, ADMS, PI Historian, and various stand-alone Microsoft Excel spreadsheets. While specific data captured varies by asset, in general the systems collect:
 - SAP – work management and financial data, captured as mass property, not specific to a particular asset;
 - GIS – geospatial and nameplate data (if available);
 - ADMS – operational time series data for real-time monitoring and control;
 - PI Historian - operational time series data for historical monitoring and analysis; and
 - Stand-alone Microsoft Excel spreadsheets – typically created to fill gaps in data collection for specific assets.

Data within these systems are captured and stored through either manual entry, remote cellular communication, or automated data integration depending on the asset and data type. The

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complexities of capturing, storing, and using data across multiple systems results in additional manual steps to evaluate, transfer, and analyze.

The Asset Repository will store key attributes currently captured across the many enterprise software systems, as well as the following:

- serial numbers of each asset,
 - name of asset manufacturer,
 - date the asset was manufactured,
 - date the asset was installed in the field, and
 - the asset rating information.
- b. The Asset Repository will standardize how asset information is stored and will have standard integrations into the enterprise software systems that improve efficiency. The Asset Repository is designed to store the asset, location, and work information so work performed on an asset at a location can be identified. This will centralize the data allowing for advance analytics to be performed with the Asset Performance Management (APM).
- c. As described in part (a) there are multiple systems that record asset data, thus the data is not married together into a single complete picture. It is not that there are different sources of the truth, but that data lives across multiple systems for the same asset. This effort is to bring those disparate sources together to allow for improved asset management.
- d. Each component of the DistAM program shares similar benefits, which are foundational to the program. The DistAM program contains the Asset Repository, which feeds the Asset Investment Planning (AIP) and APM as described on page 54 lines 5-6 of my direct testimony. Benefits must be considered holistically as they are interdependent across all portions of the program.
- e. The Company has not performed separate calculations of the cost and benefits of the Asset Repository system given that each component of the DistAM program shares similar benefits, which are foundational to the program. Benefits must be considered holistically as they are interdependent across all portions of the program. Please refer to Exhibit A-152 for the DistAM program BCA.
- f. See response to part (e).
- g. The Asset Repository system represents an advancement in the Company's ability to manage electric distribution assets proactively. There are prior legacy databases, manual processes, and engineering expertise which lead to a more reactive approach. The transition to a centralized repository reflects a strategic shift toward data-driven decision-making and predictive maintenance.
- h. The Company recognized the need for a centralized asset management system based on third-party analysis. This analysis led to the development of the Grid Modernization roadmap and identification of the Distribution Asset Management (DistAM) initiative in 2020. Prior to the kick-off of the Asset Repository project, the Company confirmed that other utilities are pursuing a DistAM strategy to manage their assets, but the Company does not have permission to share specific utility details.

The Company also utilized an industry vendor to provide a DistAM system assessment that promotes using a centralized Asset Repository to improve asset data quality, which included benchmarking with peer utilities to share and incorporate best practices into the Distribution Asset Management system. Due to vendor constraints, the Company does not have the approval

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to share the benchmarking results, including utility names and systems used, gathered through the vendor. From that benchmarking, the Company learned that peer utilities are seeking similar centralized systems to advance their Asset Management programs, like the approach the Company is taking as provided in my direct testimony starting on page 49.

Witness: Scott A. Mcphail

Date: September 16, 2025

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Question:

223. Refer to pages 56 to 58 of Mr. McPhail's direct testimony on the Asset Performance Management system. Please:

- a. Provide any evidence that the Company has gathered from other electric utilities that the Asset Performance Management (APM) system implemented by those utilities has created significant financial and non-financial benefits well in excess of the cost of the system. Identify also the utilities and when their system was implemented.
- b. Identify how many Data Scientists the Company has and their scientific background.
- c. Explain why the Company needs to prioritize assets instead of addressing all the distribution assets.
- d. Provide a separate calculation of the present value of the cost and benefits for the APM system in Excel with formulas intact.
- e. Provide the estimated financial benefits that the Company expects from implementation of the APM system by year in Excel showing the source of each of those benefits and the basis of how they were determined.

Response:

- a. Please refer to the response to U21870-AG-CE-0545, subpart (h).
- b. The Company has 15 Data Scientists. Data Scientists have a Bachelor's Degree in Information Technology, Data Analytics, or related field. Their knowledge and skill sets include but are not limited to:
 - Quantitative analytics and structure problem solving;
 - Understanding data modeling, machine learning algorithms, statistical analysis, data visualization, and data engineering;
 - Using logic and reasoning to identify the strengths and weaknesses of alternative solutions, conclusions, or approaches to problems; and
 - Create, develop, and communicate data science outputs, creating models and solutions that provide insights for the business to interpret and execute successfully.
- c. The Company faces constraints in capital, workforce, and time, making it impractical to upgrade every distribution asset at once. Instead, it employs a risk-based asset management approach that targets the most critical infrastructure with the greatest impact on safety and reliability.
- d. The Company has not performed separate calculations of the cost and benefits of the APM system given that each component of the DistAM program shares similar benefits, which are foundational to

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the program. Benefits must be considered holistically as they are interdependent across all portions of the program. Please refer to Exhibit A-152 for the DistAM program BCA.

- e. The "Assumptions & Calculations" tab in Exhibit A-152 provides a description of the numbers used in the analysis. These assumptions were collected from Company knowledge and records.

Witness: Scott A. Mcphail

Date: September 16, 2025

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Question:

171. Refer to pages 62-74 of Mr. Blumenstock's direct testimony on the forecasted capex for the Covert power plant. Please:

- a. Provide the month and year that the Covert plant was purchased.
- b. The Company is proposing several large capital expenditures to replace and upgrade major equipment components of the plant, such as Load Commutated Inverter, Static Frequency Converter, Netmation Operating System & 4S, etc., which total to more than \$173 million from 2025 to the end of the projected test year. As part of the Company's due diligence process when purchasing the plant, was the Company aware that these major capital undertakings were necessary and were they disclosed in file testimony when requesting approval for the acquisition by the Commission? If yes, provide a specific reference to testimony in a case and page number of the Company's witness testimony. If no, explain why not and why the Company is discovering the need for major capital expenditures so soon after acquisition of the plant.
- c. Explain why the LTSA and the LTSA extra work for maintenance and related activities to maintenance of the plant is capitalized and not expenses as O&M expense.
- d. Provide a copy of the LTSA in effect for the bridge period and projected test year.
- e. Given the large annual cost paid to the manufacturer for LTSA and replacement of parts and components from typical wear and tear, why is the Company incurring additional capital expenditures to replace components that are being maintained under the LTSA.
- f. For the purchase of a spare GSU transformer, is this a new strategy and practice of the Company to have spare transformers for each power plant? If yes, why now and not in the past. If no, provide evidence that other power plants in the past had spare GSU transformers.
- g. Instead of a complete spare transformer, has the Company considered maintaining an inventory of parts that are more likely to fail? Explain your answer.

Response:

- a. The Company began operating the Covert Generating Station in June 2023.
- b. The Company completed due diligence prior to acquiring the Covert Generating Station and recognized that continued investments would be necessary to maintain reliability and regulatory compliance. While the need for future capital investments was anticipated, the Company was only able to conduct robust health assessments and detailed engineering evaluations after taking ownership of the facility. These assessments identified the Load Commutated Inverter, Static Frequency Converter, Netmation Operating System & 4S, among others, as priority projects necessary to ensure continued safe and reliable operation of the plant. The acquisition was approved in MPSC Case No. U-21090, as part of the Company's Integrated Resource Plan. While the IRP outlined the strategic rationale for acquiring the Covert plant, it did not include detailed testimony on specific capital projects such as those now proposed. These projects were identified through post-acquisition

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assessments and reflect the Company's commitment to compliance with regulatory requirements and maintaining asset reliability. However, refer to Exhibit A-55 (NJK-6) pages 1-4 for the projected LTSA and non-LTSA capital expenditures and O&M that was projected for the plant through 2040. Total capital was projected at over \$300 million and total O&M was projected to be almost \$600 million.

- c. The LTSA and associated extra work are allocated between capital and O&M based on a detailed review of the contract terms and applicable accounting guidance. This allocation aligns with FERC accounting rules, which distinguish between routine maintenance (O&M) and capitalizable work that extends asset life or restores original functionality.
- d. See U21870-ST-CE-0004_0010_CONF.
- e. The contract has specific components and terms that the company is responsible for. These are required activities for maintaining contract terms and the benefits within.
- f. Having critical spares is an established strategy for the Company. The Campbell and Karn sites have spare Generation Step-Up (GSU) Transformers to mitigate outage risks and reduce restoration time in the event of a failure.
- g. The Company maintains an inventory of spare GSU components such as bushings, fans, gauges, and other items. However, failure of internal GSU components such as windings or the core cannot be repaired on-site and may require multi-year lead times for replacement. Maintaining a complete spare transformer ensures relatively rapid restoration capability and supports system reliability.

Witness: RICHARD T. BLUMENSTOCK

Date: September 10, 2025

U21870-AG-CE-0493

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Question:

174. Refer to pages 91-97 of Mr. Blumenstock's direct testimony on the forecasted capex for the Ludington power plant. Please:

- a. Provide the month and year that the Company completed the major overhaul of each of the Ludington generating units.
- b. The Company is proposing several large capital expenditures to replace major equipment components of the plant, such as Pony Motor Overhaul, Governor Replacement, DCS Control Relay Replacement, etc. for a total cost of more than \$38 million from 2025 to the end of the projected test year. Explain why the Company is discovering the need for major capital expenditures so soon after completion of the major plant overhaul.

Response:

- a. The dates listed are related to the Unit Interim Acceptance date:
 - Unit 1 – June 2019
 - Unit 2 – March 2015
 - Unit 3 – April 2022
 - Unit 4 – May 2016
 - Unit 5 – May 2017
 - Unit 6 – May 2018
- b. The major overhauls consisted of specific components related to the hydroelectric units and did not encompass all plant systems. The capital expenditures proposed in this case address components and systems that were outside the scope of the original overhaul. These needs were identified through ongoing health assessments and reliability evaluations. The projects included reflect the Company's commitment to compliance with regulatory requirements and maintaining asset reliability.

Witness: RICHARD T. BLUMENSTOCK

Date: September 12, 2025

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Question:

308. Refer to pages 28-30 of Mr. Daly's direct testimony and page 15 of Ms. Myers' direct testimony on the deferral and amortization of the net plant balances for the Campbell power plant Units 1-3 and the Department of Energy (DOE) May 23, 2025 order that the plant continue to operate past May 2025. Refer also to Federal Energy Regulatory Commission (FERC) order of August 15, 2025 in Docket No. EL25-90-000. Please answer and provide the following information with supporting calculations in Excel and explanation on how the revised amounts were determined:

- a. The changes that the Company proposes to the amortization expense of the Campbell plant regulatory asset for the bridge period and the projected test year in this rate case.
- b. The changes that the Company proposes to the Campbell average deferred regulatory asset included in working capital, if any, for the projected test year.
- c. The changes to the Return on Campbell Regulatory Asset shown on line 9 of Exhibit A-11, Schedule A-1, and Exhibit A-81, and supporting workpapers.
- d. Provide any adjustments to the return on the Campbell plant deferred regulatory asset and amortization expense that the Commission ordered the Company to recover in Case No. U-21585 based on the assumption that the plant would be retired in May 2025. Explain how the Company intends to refund to customers any over-recovered costs from that rate case.
- e. Explain the period that the Company believes the Campbell plant is or will be under FERC jurisdiction and subject to the cost allocations permitted under the August 15, 2025 FERC order.
- f. Confirm that any costs to be recovered from the Company's customers arising from the allocation of costs under FERC Docket No. EL25-90-000 and related MISO rulings will occur through the PSCR mechanism. If not confirming, explain fully.

Response:

Objection of Counsel: Consumers Energy Company objects to this discovery request on the grounds that it seeks information that is not relevant to any material issue in this proceeding. Consumers Energy is not requesting rate recovery for any costs related to operating the Campbell plant beyond May 31, 2025 in this case. Consumers Energy does not plan to amend this case to include any cost recovery for operation of the Campbell plant beyond May 31, 2025 resulting from the U.S. Department of Energy's May 23, 2025 Order. Consistent with that Order and with federal law, Consumers Energy is pursuing recovery of the costs to continue operating the Campbell plant beyond May 31, 2025 at the Federal Energy Regulatory Commission. See FERC Docket No. EL25-90-000.

- a. The Company does not propose to change anything included in the case related to Campbell.
- b. See response to a.

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- c. See response to a.
- d. See response to a. The Company plans to refund any amounts collected through the FERC process, to the extent such amounts may have been collected through MPSC jurisdictional rates, to MPSC customers.
- e. The Company is currently subject to the requirements, terms, and conditions set forth in U.S. Department of Energy Order No. 202-25-7, including a requirement to ensure the Campbell plant is available to operate through November 19, 2025.
- f. The Company's proposed cost allocation methodology proposed in FERC Docket No. EL25-90-000 remains pending at FERC. However, it is the Company's expectation that, when approved, such allocation will be implemented through the MISO settlements process and therefore recovered from Company customers via the PSCR mechanism.

Witness: Heidi J. Myers

Date: September 19, 2025

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Question:

177. Refer to pages 8-9 of Exhibit A-12, Schedule B-5.2, for Generation capex projects. For projects of \$3 million or greater, please provide the current phase of the project (scoping, conceptual design, engineering design, construction, completed, etc.), when this phase started and will be completed and when the next phase will start and be completed. Provide this information in Excel.

Response:

- a. See Attachment U21870-AG-CE-0496_ATT_0001 which presents the projects that will be completed in either the bridge period or test year. Note that the Long-Term Service Agreements are ongoing and, as such, don't have a current phase.

Witness: RICHARD T. BLUMENSTOCK

Date: September 10, 2025

CECo Response to AG-CE-0496

Project	Current Phase	Current Phase Start	Current Phase Estimated End	Next Phase	Next Phase Estimated Start	Next Phase Estimated End
PB-00002: BESS Iosco	Final Engineering	Sep-24	Oct-25	Execution	Nov-25	Nov-26
PB-00003: BESS Weadock	Final Engineering	Sep-24	Oct-25	Execution	Nov-25	Nov-26
B-PP-00109: (12818) Covert - Unit 1 - LTSA Capital - Extra work items	Execution	Jan-25	Dec-25	N/A Contract	-	-
B-PP-00111: (13571) Covert - Unit 3 - LTSA Capital - Extra work items	Execution	Jan-25	Dec-25	N/A Contract	-	-
PP-00524: COVERT LONG TERM SERVICE AGREEMENT	Execution	Jan-25	Dec-25	N/A Contract	-	-
PP-00542: Covert Spare GSU	Planning	Jan-25	Nov-25	Engineering	Dec-25	Aug-26
PP-00545: Covert -LTSA Capital - Extra Work U2	Execution	Jan-25	Dec-25	N/A Contract	-	-
PP-00579: CGS-Netmation(MHPSA Operating System)	Engineering	Jan-25	Feb-26	Installation	Mar-26	Nov-26
PP-00242: JGS LTSA spend with GE	Execution	Jan-25	Dec-25	N/A Contract	-	-
JGS - Engine 191-306 Overhaul	Construction	Feb-25	Mar-26	Installation	Apr-26	Apr-26
PT-02952: KARN 4 COMBUSTION AIR HEATER REPLACEMENT	Procurement	Oct-24	Sep-25	Installation	Oct-25	Nov-25
B-PP-00023: (9943) ZGS - LTSA - Extras not included in contract	Execution	Jan-25	Dec-25	N/A Contract	-	-
B-PP-00170: (11712) ZGS - Phase II Turbine Replacements	Procurement	May-25	Apr-25	Installation	May-28	Jun-28
B-PP-00171: (13497) ZGS - Phase II GT Advanced gas path replacement and axial fuel staging	Planning	Jan-25	Mar-26	Procurement	Apr-26	Apr-28
PP-00039: Zeeland GE LTSA Pmts - Unit 1A	Execution	Jan-25	Dec-25	N/A Contract	-	-
PP-00488: ZGS SITE SPARE GSU	Engineering	Jan-25	Nov-25	Manufacturing	Dec-25	Apr-26
PT-02905: JHC Wastewater Treatment System (move to ADMIN section)	Planning	Nov-24	Oct-25	Final Engineering	Nov-25	Jun-26
PT-02943: Lakeshore Admin Building (leave in Admin)	Construction	Aug-25	Nov-25	Close Out	Nov-25	Feb-26
Boiler Plant Heating Project	Completion	25-Mar	25-Aug	N/A		

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Question:

269. Refer to Figure 7 on page 42 of Mr. Snider's direct testimony on the proposal to create two fully staffed control centers and the annual savings. Please provide the calculations in Excel showing how the annual cost savings were determined.

Response:

See attachment U21870-AG-CE-0631_ATT_1 for details of annual cost savings and SAIDI benefits.

Witness: ANDREW R SNIDER

Date: September 18, 2025

CECo Response to AG-CE-0631

Breakdown of Control/Dispatch Center Consolidation Project Annual Progression of Benefits

Reference U-21870 on page 42 of Company witness Andrew Snider's direct testimony.

Initiative	Description	2024		2025		2026		2027	
		Cost Savings Actual	SAIDI Minutes Actual	Cost Savings Projection	SAIDI Minutes Projection	Cost Savings Projection	SAIDI Minutes Projection	Cost Savings Projection	SAIDI Minutes Projection
Saginaw Consolidation	Consolidating three dispatch control centers into two (absorbing Saginaw into Jackson) which allowed for the following between 2024 and 2027: 1. Gain efficiency in balancing resources allocation vs. demand of work. 2. Reduction of ICS activation due storm roles and activation being absorbed into two centers.	\$ 2,483,809	4.07	\$ 2,000,000	4.00	\$ 2,000,000	4.00	\$ 2,000,000	4.00
Load Transfers in JAC DCC	Conducting more load transfers by building a DCC in a second location (Jackson) between 2025 and 2027.				0.45		1.25		2.50
Storm Declaration	Early storm declaration before ICS activation leads to measurable operational efficiencies and cost savings between 2025 and 2027.			\$ 700,000	1.33	\$ 1,400,000	2.67	\$ 1,400,000	2.67
Circuit Restoration Efficiency	Integrating Dispatch/Operator functions reduces handoffs driving efficiency in circuit level outage restoration in 2027.							\$ 150,000	5.00
Energize LVD Lines Faster	Optimize energization process for LVD primary fault locations between 2026 and 2027.					\$ 179,998	0.97	\$ 575,995	3.11
Faster Storm Restoration	Accelerate storm restoration by 2 hours per event between 2025 and 2027.			\$ 1,500,000	1.74	\$ 3,020,002	3.48	\$ 3,074,005	3.48
Reduction of ICS Activation Scaling	Reduce ICS storm team activation for storm events impacting fewer than 25,000 customers in 2027.							\$ 2,100,000	
ICS 2 to 1 centers	Consolidate two ICS storm response centers (Jackson and Grand Rapids) into a single center located in Jackson in 2027.							\$ 800,000	
One time Grid operating Labor Reduction	Reduction in grid operating labor savings in 2024.	\$ 900,000							
Facilities/IT/Training	Consolidation of facilities that houses operations, training, and support groups in 2027.							\$ 100,000	
		\$ 3,383,809	4.1	\$ 4,200,000	7.5	\$ 6,600,000	12.4	\$ 10,200,000	20.8

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Question:

270. Refer to Figure 8 on page 43 of Mr. Snider's direct testimony on the proposal to create two fully staffed control centers and the annual cost savings. Please:

- a. Provide the period over which the Revised Benefits are realized.
- b. Explain how we will know that the SAIDI reductions of 20.8 minutes related to this project have been realized.

Response:

a. The period over which the revised benefits are realized is discussed in my direct testimony on page 42, lines 3–6. Full benefit realization is projected by March 2028, one year following the completion of the Control/Dispatch Center Consolidation Project. See discovery response for U21879-AG-CE-0631 for incremental SAIDI benefits.

b. The Company will evaluate the realized SAIDI reductions using actual all-weather SAIDI performance data, as described in Company witness Andrew Snider's direct testimony on page 41, lines 5–9. The 20.8-minute reduction is based on operational improvements directly tied to the project. The Company is in the process of implementing tracking net gain/loss for each initiative.

Witness: ANDREW R SNIDER
Date: September 18, 2025

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Question:

271. Refer to Figure 9 on page 45 of Mr. Snider's direct testimony on the proposal to create two fully staffed control centers and the annual cost savings. Please:

- a. Clarify whether the cost savings are from consolidation of the Control/Dispatch center or from creating two fully staffed control centers after the consolidation.
- b. Confirm that from 2024 to 2027, the Company will have achieved \$21 million of incremental cost savings (\$24.4 million - \$3.4 million). Please identify how much of the \$21 million has been reflected in the projected test year as a reduction of O&M expense and provide a reference to an exhibit and line number. Provide the calculations supporting that amount and evidence that the savings are included in the exhibit.

Response:

A. The cost savings shown in Figure 9 of Company witness Andrew Snider's direct testimony on page 45 are attributable to the consolidation of the Control/Dispatch Center functions. These savings result from operational efficiencies gained through merging dispatch operations, optimizing resource allocation, and reducing service restoration costs. The creation of two fully staffed control centers enables the Company to mitigate key operational risks, including those associated with severe weather events, facility outages, and workforce stability.

As explained in the Company's response to discovery request U21870-ST-CE-0098 (5.c), the revised two-center model addresses the risk of losing experienced employees by allowing the Company to retain talent in both Jackson and Grand Rapids. This approach avoids the disruption and attrition that would have resulted from requiring relocation under a single-center model. The geographic redundancy and workforce flexibility provided by the dual-center configuration are essential to ensuring continuity of operations and long-term organizational resilience.

B. The Company confirms that the cumulative cost savings from 2024 through 2027 are projected to total \$24.4 million, with \$3.4 million realized in 2024, resulting in \$21 million of incremental savings over the remaining period. These savings are categorized as cost avoidance and are not reflected as a direct reduction to O&M expense in the projected test year. As such, they are not shown in any exhibit as a line-item credit to O&M.

Witness: ANDREW R SNIDER
Date: September 18, 2025

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Question:

272. Refer to lines 1-8 on page 13 of Mr. Guinn's direct testimony regarding Emergent Repairs. Please identify any specific known projects and related dollars for the bridge period and the projected test year, separately. Provide also the current project development phase of those projects (Project concept, scoping, conceptual design, engineering design completed, construction, completed, etc.). Provide this information in Excel.

Response:

See excel attachment U21870-AG-CE-0647_ATT_1. All projects listed are either in construction or will be fully constructed before year end 2025. Emergent repairs are by definition unknown. Therefore, there are no known projects for the projected test year.

Witness: Quentin A. Guinn

Date: September 16, 2025

CECo Response to AG-CE-0647

Utility Type	Facility	Emergent Repairs	Actual Spend 1/1/25 Thru 9/15/25
		Project Name	Electric Allocation of Spend (\$000)
Electric / Gas	Parnall	UPS BATTERY MONITORING SYSTEM	7.34
Electric / Gas	Flint	DOOR REPLACEMENT (METER COUNTER)	1.80
Electric / Gas	Parnall	ICE MACHINE REPLACEMENT	1.32
Electric / Gas	One Energy Plaza	WATER SOFTNER REPLACEMENT	16.39
Electric / Gas	Jackson Service Center	Heater Replacement	1.67
Electric / Gas	One Energy Plaza	SUMP PUMP REPLACEMENT (2)	5.88
Electric / Gas	Alma	ICE MACHINE (2) REPLACEMENT	4.89
Electric / Gas	Midland	CONCRETE SLABS FOR YARD RACKS	4.26
Electric / Gas	One Energy Plaza	DRAINAGE SYS (S-POST OFFICE BSMT WALL)	143.10
Electric / Gas	Kalamazoo	AGG BIN ELECTRICAL PANEL REPLACEMENT	6.36
Electric / Gas	One Energy Plaza	PARKING STRUCTURES CONDITION ASSESS	8.07
Electric / Gas	Bay City	UPS DOOR REPLACEMENT	1.31
Electric / Gas	Midland	FLEET GARAGE OH DOOR REPLACEMENT	3.07
Electric / Gas	Parnall	INSIDE FENCE (FACILITY STORAGE)	4.89
Electric / Gas	Saginaw	FLEET GARAGE OFFICE FURNACE REPLACE	6.85
Electric / Gas	Jackson Service Center	DOOR (GAS SERVICE) REPLACEMENT	7.46
Electric / Gas	Kalamazoo	LIGHTING FIXTURE REPLCMT (CARPORT)	14.68
Electric / Gas	One Energy Plaza	PIPING REPLACEMENT (400T Piping)	6.43
Electric / Gas	South Haven	DOOR REPLACEMENT (16)	70.94
Electric / Gas	Hastings	LIGHT FIXTURE REPLCMT (GARAGE/IPA)	6.36
Electric / Gas	Kalamazoo	EV CHARGER HEAD REPLACEMENT	3.22
Electric / Gas	Midland TC	BUILDING DECOMMISSIONING/ DEMO	3.50
Electric / Gas	Adrian	ICE MACHINE REPLACEMENT	2.64
Electric / Gas	Adrian	GRAVEL DRIVEWAY INSTALL	33.45
Electric / Gas	Kalamazoo	HOIST (MOBILE)	44.03
Electric / Gas	Hastings	WATER SOFTNER REPLACEMENT	3.42
Electric / Gas	Lansing	CHILLER VFD REPLACEMENT	57.73
Electric / Gas	One Energy Plaza	CHILLER PUMP REPLACEMENT	7.34
Electric / Gas	Kalamazoo	Communicator	1.22
Electric	Tawas	I-VU CONTROLS REPLACEMENT	9.34
Electric / Gas	Grand Rapids	LIGHT FIXTURE (BILL PAY LOT) REPLCMT	29.91
Electric / Gas	Grand Rapids	IP A DOOR 11 & 24 REPLACEMENT	8.15
Electric / Gas	Battle Creek	POLE BARN LIGHTING REPLACEMENT	1.80
Electric / Gas	Coldwater	GATE (SLIDE) REPLACEMENT	5.40
Electric / Gas	Fremont	HOIST (FLEET PORTABLE)	76.50
Electric / Gas	Battle Creek	PARKING LOT AND FENCE INSTALL	18.00
Electric	Tawas	UPS BATTERY REPLACEMENT	4.14
Electric / Gas	West Branch	UPS BATTERY REPLACEMENT	3.04
Electric / Gas	Traverse City	WATER LINE REPLACEMENT	12.42
Electric / Gas	Grand Rapids	OH Dr 34/ Operator Rplcmt -MDC Dock	29.03
Electric / Gas	Grand Rapids	CONCRETE SLAB AG BIN	39.99
Electric / Gas	Trail Street Lab	EV HEAD REPLACEMENT	2.70
Electric / Gas	Battle Creek	OH Door Replacement	15.16
Electric / Gas	Fremont	EV CHARGER REPLACEMENT	7.20
Electric / Gas	Ludington	DOOR (4&9) REPLACEMENT	14.06
Electric / Gas	Grand Rapids	DOCK HEATER (MDC) REPLACEMENT	6.62
Electric / Gas	Fremont	ICE MACHINE REPLACEMENT	5.76
Electric / Gas	Traverse City	HOIST #2 REMOVAL	14.64
Electric / Gas	East Kent	IP AIR TUBE HEATER REPLACEMENT	2.25
Electric / Gas	Battle Creek	Heat Pump 22 Replacement	9.45
Electric / Gas	Battle Creek	Heat Pump #6 Replacement	12.19
Electric / Gas	Muskegon Norton Shores	HVAC CONTROL SERVER REPLACEMENT	9.96
Electric / Gas	Traverse City	OVERHEAD DOOR #8 REPLACEMENT	13.50
Electric / Gas	One Energy Plaza	BOILER 2&3 REPLACEMENT	229.50
Electric / Gas	Cadillac	PUMP (Oil Separator) REPLACEMENT	21.60
Electric / Gas	Muskegon Norton Shores	DOOR 13 REPLACEMENT	4.81
Electric / Gas	East Kent	AIR COMPRESSOR REPLACEMENT	12.60
Electric / Gas	South Monroe	ICE MACHINE REPLACEMENT	4.86
Electric	Tawas	PRESSURE WASHER REPLACEMENT	5.40
Electric / Gas	Alma	EERC RAIL SPUR RPLC & TRANSFRMR SLAB	203.45
			1,313.05

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Question:

286. Refer to page 79 of Mr. Guinn's direct testimony regarding the Fleet Expansion Spending. Please:

- a. Provide the basis and calculations in Excel used to arrive at the list of additional vehicles needed by type to support the increase in planned work activities.
- b. Identify the additional vehicles and related cost assigned to each Electric Distribution subprogram listed in Exhibit A-113 for the bridge period and projected test year. Provide this information in Excel.

Response:

- a. See attachment U21870-AG-CE-0661_ATT_1.
- b. Vehicles are not directly assigned to the work conducted in a single subprogram, i.e., a truck is not used for the single purpose of reliability projects as the personnel utilizing the vehicle conduct work across the Company's system. As a result, the Company applies an allocation of fleet costs to all capital and O&M work that is conducted by the Company's crews. The fleet costs are included in Exhibits A-114 through A-119 in the "Other (Loadings and Chargebacks)" line.

Attachment U21870-AG-CE-0661_Guinn_ATT_2 provides the specific breakout of fleet Loadings by sub-program.

The Company has not conducted a separate analysis on the allocation that is resultant from the additional vehicles and related costs.

Witness: Quentin A. Guinn

Date: September 23, 2025

CECo Response to AG-CE-0661

U21870-AG-CE-0661_ATT_1		12 months ending 12/31/2025	12 months ending 12/31/2026	12 months ending 4/30/2027	Electric Underground*	Electric Low Voltage Distribution**
<u>Vehicle Spec</u>	<u>Description</u>	Projected Unit Count	Projected Unit Count	Projected Unit Count	Unit Count Allocation	Unit Count Allocation
		8	148	229	71	158
22	1/2T	-	3	3	3	0
28	3/4T PICKUP	8	53	53	15	38
55	10 YARD DUMP	-	3	3	3	0
42 / 59	FITTING TRUCK	-	10	10	10	0
77	DERRICK TRUCK	-	-	43	5	38
89/96	BUCKET TRUCK	-	-	38	0	38
90	REEL TRUCK	-	10	10	10	0
E11	TRENCHER	-	8	8	3	5
E20	BACKHOE	-	1	1	1	0
E36	EXCAVATOR	-	15	15	10	5
E79	DIRECTIONAL DRILL	-	3	3	3	0
FLTREEL	SINGLE REEL TRAILER	-	3	3	3	0
FLTREEL	TRIPLE REEL TRAILER	-	2	2	2	0
FLTEQUIP	EQUIPMENT TRAILER	-	18	18	3	15
FLTPOLE	POLE TRAILER	-	19	19	0	19
*Basis used for additional vehicles in Electric Underground in Tab 2						
**Basis used for additional vehicles in Electric Low Voltage Distribution in Tab 3						

AG Recalculated Vehicle Purchase Costs for the Projected Test Year		(c)						(d)			AG Calculated Average Cost per Vehicle		Company		AG Test Year AG		Difference
(a)	(b)	12 months ended 12/31/2022	12 months ended 12/31/2023	12 months ended 12/31/2024	12 months ended 12/31/2025	12 months ended 12/31/2026	12 months ended 12/31/2027	Average Cost 2022-2024	Average Units 2022-2024	Average Cost per Unit	12 months ending 4/30/2027	12 months ending 4/30/2027	AG Test Year Units	Test Year AG Recalculated			
Line No.		Actual Spend	Actual Unit Count	Actual Spend	Actual Unit Count	Actual Spend	Actual Unit Count	Projected Spend	Projected Unit Count	Projected Spend	Projected Unit Count	AG Test Year Units	Test Year AG Recalculated				
1 Fleet Vehicle Capital Replacement Plan		17,083	122	17,438	282	16,293	312	20,778	89	89	16,407	(4,371)					
07	SEDAN MID SIZE 4DR	-	-	190	4	-	-	63	1	\$ 47	64	1	\$ 50				
20	1/2 TON PICKUP	-	-	-	-	-	-	-	-	-	-	-	-				
22	1/2 TON PICKUP	27	4	742	15	1,076	19	615	13	\$ 49	370	6	\$ 307				
23	VAN CARGO	1,396	24	923	13	1,029	12	1,116	16	\$ 68	-	-	-				
26	1 TON PICKUP WITH SERVICE BODY SH	672	18	115	2	513	7	433	9	\$ 48	-	-	-				
27	TRUCK SVC 4WD	-	-	27	-	-	-	9	-	-	-	-	-				
28	3/4 TON PICKUP	180	8	892	17	563	15	545	13	\$ 41	1,374	18	\$ 775				
29	TRUCK DARKROOM 4WD	-	-	-	-	-	-	-	-	-	-	-	-				
36	1 TON PICKUP WITH SERVICE BODY	-	-	806	12	353	6	386	6	\$ 64	1,606	14	\$ 950				
39	VAN CARGO HI ROOF	62	1	211	2	-	-	91	1	\$ 91	-	-	-				
41	1 TON WELDER TRUCK	-	-	-	-	-	-	-	-	-	-	-	-				
42	GAS SERVICE TRUCK	-	-	-	-	-	-	-	-	-	-	-	-				
43	2-3 YARD DUMP TRUCK	-	-	-	-	-	-	-	-	-	-	-	-				
44	GAS CONSTRUCTION CREW TRUCK	-	-	-	-	-	-	-	-	-	-	-	-				
45	MECHANIC SERVICE TRUCK	329	2	-	-	578	2	302	1	\$ 227	102	1	\$ 239				
54	5 YARD DUMP TRUCK SINGLE AXLE	57	1	95	1	65	1	72	1	\$ 72	-	-	-				
55	10 YARD DUMP TRUCK TANDEM AXLE	34	1	-	-	-	-	11	0	\$ 34	-	-	-				
57	MEDIUM DUTY CRANE TRUCK	272	1	-	-	-	-	91	0	\$ 272	-	-	-				
59	STAKE RACK TRUCK	78	2	-	-	-	-	26	1	\$ 39	149	1	\$ 41				
60	ELECTRIC SERVICE TRUCK	316	6	4,251	14	239	74	1,602	31	\$ 51	407	3	\$ 162				
61	TRUCK SVC AERIAL 41' 4WD	225	1	-	-	-	-	75	0	\$ 225	280	1	\$ 238				
64	SERVICE TRUCK WITH AERIAL DEVICE	-	-	-	-	1,486	5	495	2	\$ 297	3,035	10	\$ 3,132				
65	TRUCK STREETLIGHT SUBSTATION OPERATIONS SERVICE	-	-	-	-	-	-	-	-	-	-	-	-				
67	TRUCK	62	1	-	-	-	-	21	0	\$ 62	-	-	-				
75	TRUCK DIG/DRK W/FLATBED	-	-	-	-	-	-	-	-	-	-	-	-				
77	DIGGER DERRICK TRUCK	4,202	11	743	2	2,142	15	2,362	9	\$ 253	4,368	11	\$ 2,934				
81	TRUCK SVC AERIAL TANDUM AXLE TRACTOR WITH FIFTH	-	-	-	-	551	1	184	0	\$ 551	-	-	-				
85	WHEEL HITCH	190	2	-	-	259	2	150	1	\$ 128	-	-	-				
89	BUCKET TRUCK	4,118	10	21	-	540	3	1,560	4	\$ 360	7,888	18	\$ 6,826				
90	FLATBED TRUCK	153	2	153	2	97	1	134	2	\$ 80	-	-	-				
96	BUCKET TRUCK	4,461	13	2,197	6	-	-	2,219	6	\$ 350	457	1	\$ 369				
99	MISC. TRUCK	-	-	-	-	-	-	-	-	-	-	-	-				
	EQUIPMENT	629	5	1,451	15	2,350	22	1,477	14	\$ 105	541	3	\$ 333				
	TRAILERS	264	9	3,301	55	2,667	63	2,077	42	\$ 49	137	1	\$ 52				
	Lease Buyout - Electric/Common	702	-	900	90	853	45	818	45	\$ 18	-	-	-				
	Rental Buyouts	11	-	421	32	931	20	454	17	\$ 26	-	-	-				
	Write-Off 2021 Write-Off	-	-	-	-	-	-	-	-	-	-	-	-				
	Historical Disallowance - Toolkit Removal	(1,354)	-	-	-	-	-	-	-	-	-	-	-				
2 Fleet Vehicle Electrification		840	18	-	-	-	-	-	-	-	-	-	-				
22	Electric Vehicle Investment	-	-	-	-	-	-	-	-	-	240	6	-				
64	Altec JEMS	-	-	-	-	-	-	-	-	-	600	12	-				
3 Fleet Expansion		2,054	34	-	-	-	-	46,070	229	79	18,139	(27,931)					
22	1/2T	19	4	-	-	-	-	49	168	3	-	-	-				
28	3/4T PICKUP	-	-	-	-	-	-	41	3,074	53	19	\$ 818					
55	10 YARD DUMP	-	-	-	-	-	-	34	445	3	-	-					
42 / 59	FITTING TRUCK	-	-	-	-	-	-	39	1,000	10	-	-					
77	DERRICK TRUCK	-	-	-	-	-	-	253	15,597	43	19	\$ 5,067					
89/96	BUCKET TRUCK	-	-	-	-	-	-	350	13,610	38	19	\$ 7,015					
90	REEL TRUCK	773	10	-	-	-	-	80	1,830	10	-	-					
E11	TRENCHER	-	-	-	-	-	-	105	2,255	8	3	\$ 333					
E20	BACKHOE	-	-	-	-	-	-	105	160	1	-	-					
E36	EXCAVATOR	-	-	-	-	-	-	105	1,547	15	2	\$ 222					
E79	DIRECTIONAL DRILL	-	-	-	-	-	-	105	375	3	-	-					
FLTREEL	SINGLE REEL TRAILER	-	-	-	-	-	-	49	300	3	-	-					
FLTREEL	TRIPLE REEL TRAILER	-	-	-	-	-	-	49	200	2	-	-					
FLTEQUIP	EQUIPMENT TRAILER	-	-	-	-	-	-	49	855	18	8	\$ 415					
FLTPOLE	POLE TRAILER	-	-	-	-	-	-	49	855	19	9	\$ 467					
Spec 77 Tools	-	-	-	-	-	-	-	-	1,900	-	-	1,900					
Spec 89/96 Tools	-	-	-	-	-	-	-	-	1,900	-	-	1,900					
Equipment	EQUIPMENT	519	3	-	-	-	-	-	-	-	-	-					
Trailers	TRAILERS	743	17	-	-	-	-	-	-	-	-	-					
4 Fleet Business Partner Funded		686	1	40	2	55	1	-	-	-	-	-	-				
28	3/4T PICKUP	-	-	-	-	55	1	-	-	-	-	-	-				
07	SEDAN MID SIZE 4DR	-	-	9	1	-	-	-	-	-	-	-	-				
22	1/2 Ton Pickup	-	-	31	1	-	-	-	-	-	-	-	-				
	Generation Rebuild	686	1	-	-	-	-	-	-	-	-	-	-				
5 Totals:		19,823	157	17,478	284	16,348	313	67,688	336	168	34,546	(33,142)					

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Page 1 of 1

Question:

281. Refer to page 54 of Mr. Guinn's direct testimony regarding Fleet Utilization. Please provide a list of equipment and vehicles that were utilized less than 50% during 2024 and the date when that vehicle was last used.

Response:

See attachment U21870-AG-CE-0656_ATT_1.

Witness: Quentin A. Guinn

Date: September 23, 2025

THE REMAINING PAGES OF THIS EXHIBIT IS A 46 REPORT OF FLEET UTILIZATION

	A	B	C	D	E	F
1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
2	E90027	0.0%	PERSONNEL CARRIER	FLE90	Common	6/29/2021
3	24014	0.0%	VAN	FL23	Gas	7/26/2021
4	E11888	0.0%	TRENCHER	FLE11C	Electric	9/1/2021
5	41004	0.0%	PICKUP	FL41	Gas	9/13/2021
6	E10063	0.0%	TRENCHER	FLE11A	Gas	9/15/2021
7	E43002	0.0%	AIR COMPRESSOR	FLE43	Electric	10/20/2021
8	E36989	0.0%	EXCAVATOR	FLE36	Gas	10/28/2021
9	E11075	0.0%	TRENCHER	FLE11B	Electric	11/1/2021
10	E79056	0.0%	DIRECTIONAL DRILL	FLE79	Gas	11/3/2021
11	E26017	0.0%	COMPACT LOADER	FLE26	Gas	12/23/2021
12	E80017	0.0%	FLEX TRACK	FLE78	Electric	1/3/2022
13	E11157	0.0%	TRENCHER	FLE11A	Gas	1/19/2022
14	E79886	0.0%	DIRECTIONAL DRILL	FLE79	Gas	1/19/2022
15	E93230	0.0%	DOZER	FLE30	Gas	3/4/2022
16	E36065	0.0%	EXCAVATOR	FLE36	Gas	3/16/2022
17	E10234	0.0%	TRENCHER	FLE11A	Electric	3/22/2022
18	06010	0.0%	SEDAN	FL06	Common	6/3/2022
19	E25033	0.0%	TOOL CARRIER	FLE25	Gas	6/13/2022
20	E36034	0.0%	EXCAVATOR	FLE36	Gas	6/13/2022
21	59024	0.0%	FLATBED/STAKE RACK	FL59	Common	7/27/2022
22	E36083	0.0%	EXCAVATOR	FLE36	Gas	7/27/2022
23	E90040	0.0%	PERSONNEL CARRIER	FLE90	Gas	8/17/2022
24	26030	0.0%	PICKUP	FL26	Gas	8/19/2022
25	29028	0.0%	PICKUP	FL28	Electric	10/4/2022
26	28461	0.0%	PICKUP	FL28	Electric	11/7/2022
27	E87334	0.0%	UTILITY TRACTOR	FLE23	Gas	2/15/2023
28	59860	0.0%	FLATBED/STAKE RACK	FL59	Electric	2/24/2023
29	E11162	0.0%	TRENCHER	FLE11B	Common	3/7/2023
30	E36124	0.0%	EXCAVATOR	FLE36	Gas	3/21/2023
31	38812	0.0%	PICKUP	FL28	Electric	3/22/2023
32	99008	0.0%	VACUUM TRUCK	FL46	Electric	5/4/2023
33	E26015	0.0%	COMPACT LOADER	FLE26	Gas	5/4/2023
34	E11731	0.0%	TRENCHER	FLE11B	Electric	5/8/2023
35	45818	0.0%	FLEET SERVICE TRUCK	FL45	Common	5/10/2023
36	99028	0.0%	VACUUM TRUCK	FL46	Electric	5/16/2023
37	E81838	0.0%	FLEX TRACK	FLE78	Electric	5/19/2023
38	32499	0.0%	PICKUP	FL22	Electric	6/7/2023
39	32851	0.0%	PICKUP	FL_22K	Electric	6/7/2023
40	22156	0.0%	PICKUP	FL22	Gas	6/9/2023
41	E90276	0.0%	PERSONNEL CARRIER	FLE90	Gas	6/9/2023
42	E36011	0.0%	EXCAVATOR	FLE36	Electric	6/15/2023
43	E43005	0.0%	AIR COMPRESSOR	FLE43	Gas	7/11/2023
44	E26070	0.0%	COMPACT LOADER	FLE26	Electric	8/16/2023
45	07004	0.0%	SUV	FL07	Gas	8/17/2023
46	E10885	0.0%	TRENCHER	FLE11A	Gas	8/24/2023
47	E36968	0.0%	EXCAVATOR	FLE36	Gas	8/25/2023
48	E79851	0.0%	DIRECTIONAL DRILL	FLE79	Gas	8/28/2023
49	E90021	0.0%	PERSONNEL CARRIER	FLE90	Electric	9/6/2023
50	22836	0.0%	PICKUP	FL22	Electric	9/11/2023
51	27081	0.0%	PICKUP	FL27A	Gas	9/19/2023

	A	B	C	D	E	F
1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
52	54097	0.0%	DUMP TRUCK	FL54	Gas	10/2/2023
53	64075	0.0%	SERVICE BUCKET TRUCK	FL_64	Electric	10/17/2023
54	36117	0.0%	PICKUP	FL36	Electric	10/19/2023
55	E90031	0.0%	PERSONNEL CARRIER	FLE90	Electric	10/20/2023
56	28918	0.0%	PICKUP	FL28	Electric	10/25/2023
57	E10825	0.0%	TRENCHER	FLE11A	Electric	10/30/2023
58	E26020	0.0%	COMPACT LOADER	FLE26	Electric	10/31/2023
59	06056	0.0%	SEDAN	FL06	Gas	11/3/2023
60	E36779	0.0%	EXCAVATOR	FLE36	Gas	11/14/2023
61	99004	0.0%	DUMP TRUCK	FL55	Electric	11/29/2023
62	E20082	0.0%	BACKHOE	FL_E20BB	Gas	12/6/2023
63	E11084	0.0%	TRENCHER	FLE11B	Electric	12/12/2023
64	28542	0.0%	PICKUP	FL28	Common	12/18/2023
65	85082	0.0%	OTR TRACTOR	FL85A	Gas	12/22/2023
66	54022	0.0%	DUMP TRUCK	FL54	Electric	1/9/2024
67	22103	0.0%	PICKUP	FL22	Common	1/16/2024
68	64854	0.0%	SERVICE BUCKET TRUCK	FL64	Electric	1/16/2024
69	77139	0.0%	DIGGER DERRICK	FL77	Electric	1/17/2024
70	22488	0.0%	PICKUP	FL22	Electric	1/18/2024
71	23386	0.0%	VAN	FL23	Gas	1/22/2024
72	E90157	0.0%	PERSONNEL CARRIER	FLE90	Gas	1/22/2024
73	36242	0.0%	PICKUP	FL36	Electric	1/24/2024
74	38652	0.0%	PICKUP	FL28	Electric	1/30/2024
75	06181	0.0%	SEDAN	FL06	Electric	2/2/2024
76	23239	0.0%	VAN	FL23	Gas	2/6/2024
77	28858	0.0%	PICKUP	FL28	Common	3/18/2024
78	E90091	0.0%	PERSONNEL CARRIER	FLE90	Common	3/21/2024
79	12149	0.0%	SEDAN	FL06	Gas	4/8/2024
80	25448	0.0%	VAN	FL23	Gas	4/18/2024
81	33238	0.0%	VAN	FL23	Gas	5/17/2024
82	E10032	0.0%	TRENCHER	FLE11A	Gas	6/10/2024
83	E25124	0.0%	TOOL CARRIER	FLE25	Gas	6/11/2024
84	28013	0.0%	PICKUP	FL28	Gas	7/29/2024
85	37009	0.0%	SERVICE TRUCK	FL37	Gas	7/29/2024
86	E20108	0.0%	BACKHOE	FLE20	Electric	7/31/2024
87	E99003	0.0%	UTILITY TRACTOR	FLE23	Electric	9/5/2024
88	23069	0.0%	VAN	FL23	Gas	9/16/2024
89	23814	0.0%	VAN	FL23	Gas	9/16/2024
90	67013	0.0%	ELECTRIC SERVICE TRUCK	FL67	Common	9/26/2024
91	23704	0.0%	VAN	FL23	Gas	11/1/2024
92	29057	0.0%	PICKUP	FL28	Electric	12/3/2024
93	E22861	0.0%	COMPACT LOADER	FLE26	Gas	1/9/2025
94	27503	0.0%	PICKUP	FL27B	Electric	1/24/2025
95	44219	0.0%	GAS SERVICE TRUCK	FL44	Gas	2/5/2025
96	E23019	0.0%	UTILITY TRACTOR	FLE23	Electric	4/14/2025
97	E94831	0.0%	CABLE PULLING TRLR	FLTPULLER	Electric	5/6/2025
98	44028	0.0%	GAS SERVICE TRUCK	FL44	Gas	6/9/2025
99	44255	0.0%	GAS SERVICE TRUCK	FL44	Gas	7/2/2025
100	22748	0.0%	PICKUP	FL22	Common	7/21/2025
101	23003	0.0%	VAN	FL23	Gas	7/29/2025

	A	B	C	D	E	F
1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
102	E99043	0.0%	MISC EQUIP	FLEMISC	Electric	8/12/2025
103	36222	0.0%	PICKUP	FL36	Electric	8/15/2025
104	E95018	0.0%	PLATFORM LIFT	FLE95A	Electric	8/20/2025
105	E95040	0.0%	PLATFORM LIFT	FLE95A	Electric	8/22/2025
106	E36264	0.0%	EXCAVATOR	FLE36	Gas	8/29/2025
107	85094	0.0%	OTR TRACTOR	FL85A	Electric	9/2/2025
108	06013	0.0%	SEDAN	FL06	Gas	9/10/2025
109	E79815	0.0%	DIRECTIONAL DRILL	FLE79	Common	9/11/2025
110	E20945	0.0%	BACKHOE	FLE20	Gas	9/12/2025
111	E81013	0.0%	FLEX TRACK	FLE78	Electric	9/12/2025
112	22214	0.0%	PICKUP	FL22	Electric	9/16/2025
113	22094	0.0%	PICKUP	FL22	Electric	9/17/2025
114	22404	0.0%	PICKUP	FL22	Gas	9/17/2025
115	22424	0.0%	PICKUP	FL22	Gas	9/17/2025
116	22522	0.0%	PICKUP	FL22	Gas	9/17/2025
117	22524	0.0%	PICKUP	FL22	Electric	9/17/2025
118	22614	0.0%	PICKUP	FL22	Common	9/17/2025
119	23004	0.0%	VAN	FL23	Gas	9/17/2025
120	24016	0.0%	VAN	FL23	Gas	9/17/2025
121	26091	0.0%	PICKUP	FL26	Electric	9/17/2025
122	27020	0.0%	PICKUP	FL27B	Gas	9/17/2025
123	27030	0.0%	PICKUP	FL27B	Gas	9/17/2025
124	28387	0.0%	PICKUP	FL28	Gas	9/17/2025
125	33208	0.0%	VAN	FL23	Gas	9/17/2025
126	38225	0.0%	PICKUP	FL28	Gas	9/17/2025
127	44376	0.0%	GAS SERVICE TRUCK	FL44	Gas	9/17/2025
128	60061	0.0%	ELECTRIC SERVICE TRUCK	FL60	Electric	9/17/2025
129	77106	0.0%	DIGGER DERRICK	FL77	Electric	9/17/2025
130	E36856	0.0%	EXCAVATOR	FLE36	Gas	9/17/2025
131	E28007	0.0%	UTILITY TRACTOR	FLE23	Electric	Unknown
132	E90025	0.0%	PERSONNEL CARRIER	FLE90	Gas	Unknown
133	E90036	0.0%	PERSONNEL CARRIER	FLE90	Electric	Unknown
134	E90066	0.0%	PERSONNEL CARRIER	FLE90	Electric	Unknown
135	E90089	0.0%	AIR COMPRESSOR	FLE43	Gas	Unknown
136	E93000	0.0%	PLATFORM LIFT	FLE95A	Common	Unknown
137	E95027	0.0%	PLATFORM LIFT	FLE95A	Electric	Unknown
138	E95092	0.0%	FLASHING ARROW TRLR	FLTFLSHARW	Electric	Unknown
139	E99446	0.0%	UTILITY TRACTOR	FLE23	Gas	Unknown
140	77007	0.4%	DIGGER DERRICK	FL77	Electric	9/30/2024
141	44139	0.4%	GAS SERVICE TRUCK	FL44	Gas	2/14/2025
142	E90046	0.4%	PERSONNEL CARRIER	FLE90	Electric	4/9/2025
143	44009	0.4%	GAS SERVICE TRUCK	FL44	Gas	4/24/2025
144	E26007	0.4%	COMPACT LOADER	FLE26	Gas	4/30/2025
145	E67010	0.4%	CRANE	FLE67	Electric	6/19/2025
146	54856	0.4%	DUMP TRUCK	FL54	Common	8/7/2025
147	36002	0.4%	PICKUP	FL36	Electric	8/13/2025
148	23369	0.4%	VAN	FL23	Gas	9/4/2025
149	98052	0.4%	CRANE	FL98	Electric	9/10/2025
150	E11136	0.4%	TRENCHER	FLE11B	Electric	9/10/2025
151	E90005	0.4%	PERSONNEL CARRIER	FLE90	Gas	9/11/2025

	A	B	C	D	E	F
1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
152	45007	0.4%	FLEET SERVICE TRUCK	FL45	Common	9/17/2025
153	85026	0.4%	OTR TRACTOR	FL85A	Electric	9/17/2025
154	E11072	0.4%	TRENCHER	FLE11B	Electric	9/17/2025
155	E25034	0.5%	TOOL CARRIER	FLE25	Gas	2/28/2024
156	E11116	0.5%	TRENCHER	FLE11B	Gas	8/29/2025
157	22203	0.7%	PICKUP	FL22	Gas	3/25/2024
158	E90024	0.8%	PERSONNEL CARRIER	FLE90	Common	6/10/2024
159	E90050	0.8%	PERSONNEL CARRIER	FLE90	Common	3/27/2025
160	E90156	0.8%	PERSONNEL CARRIER	FLE90	Gas	5/5/2025
161	E11357	0.8%	TRENCHER	FLE11A	Gas	7/7/2025
162	E11167	0.8%	TRENCHER	FLE11C	Gas	8/19/2025
163	06189	0.8%	SEDAN	FL06	Gas	8/29/2025
164	E22008	0.8%	COMPACT LOADER	FLE26	Electric	9/8/2025
165	20163	0.8%	PICKUP	FL22	Gas	9/17/2025
166	E10088	0.8%	TRENCHER	FLE11B	Gas	9/17/2025
167	12159	0.8%	SEDAN	FL06	Gas	4/22/2024
168	33738	0.8%	VAN	FL23	Gas	5/23/2024
169	E10124	0.8%	TRENCHER	FLE11A	Gas	4/22/2024
170	E81886	0.9%	FLEX TRACK	FLE78	Electric	4/2/2024
171	33768	0.9%	VAN	FL23	Gas	10/28/2024
172	E10128	1.0%	TRENCHER	FLE11B	Gas	8/7/2025
173	E10815	1.0%	TRENCHER	FLE11A	Gas	8/26/2025
174	E36886	1.0%	EXCAVATOR	FLE36	Gas	9/17/2025
175	22476	1.1%	PICKUP	FL22	Gas	1/5/2024
176	E95000	1.1%	PLATFORM LIFT	FLE95A	Gas	4/25/2025
177	36010	1.1%	PICKUP	FL36	Electric	4/30/2025
178	22371	1.1%	PICKUP	FL22	Gas	6/11/2025
179	E78001	1.1%	WATER TRUCK	FLE59	Electric	7/23/2025
180	E20059	1.1%	UTILITY TRACTOR	FLE23	Common	8/15/2025
181	59109	1.1%	FLATBED/STAKE RACK	FL59	Electric	4/19/2024
182	25131	1.3%	VAN	FL23	Electric	6/24/2024
183	E11146	1.3%	TRENCHER	FLE11B	Gas	9/5/2025
184	22676	1.4%	PICKUP	FL22	Electric	9/16/2025
185	E95034	1.5%	PLATFORM LIFT	FLE95A	Electric	2/12/2025
186	23661	1.5%	VAN	FL23	Common	12/11/2024
187	E40539	1.5%	WELDER	FLE53	Electric	4/25/2025
188	E23002	1.5%	UTILITY TRACTOR	FLE23	Electric	8/18/2025
189	E11051	1.5%	TRENCHER	FLE11C	Electric	8/26/2025
190	E36051	1.5%	EXCAVATOR	FLE36	Electric	9/10/2025
191	E90047	1.5%	PERSONNEL CARRIER	FLE90	Common	9/12/2025
192	83007	1.5%	FLATBED/STAKE RACK	FL83	Common	9/17/2025
193	33818	1.5%	VAN	FL23	Gas	4/30/2024
194	22486	1.8%	PICKUP	FL22	Electric	2/27/2024
195	28908	1.8%	PICKUP	FL28	Electric	4/25/2024
196	E36073	1.9%	EXCAVATOR	FLE36	Gas	4/29/2025
197	E36131	1.9%	EXCAVATOR	FLE36	Gas	5/5/2025
198	E10048	1.9%	TRENCHER	FLE11B	Gas	9/16/2025
199	E22820	1.9%	COMPACT LOADER	FLE26	Gas	12/13/2024
200	36169	1.9%	PICKUP	FL36	Electric	1/6/2025
201	44089	1.9%	GAS SERVICE TRUCK	FL44	Gas	1/28/2025

	A	B	C	D	E	F
1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
202	E11175	1.9%	TRENCHER	FLE11B	Gas	5/2/2025
203	E40021	1.9%	AIR COMPRESSOR	FLE43	Electric	5/9/2025
204	E90096	1.9%	PERSONNEL CARRIER	FLE90	Electric	5/27/2025
205	28004	1.9%	PICKUP	FL28	Gas	6/30/2025
206	E20010	1.9%	BACKHOE	FLE20	Electric	7/18/2025
207	E11237	1.9%	TRENCHER	FLE11C	Gas	7/30/2025
208	E95012	1.9%	PLATFORM LIFT	FLE95A	Electric	9/3/2025
209	27043	1.9%	PICKUP	FL27B	Gas	9/16/2025
210	28757	1.9%	PICKUP	FL28	Gas	9/17/2025
211	E94810	1.9%	CABLE PULLING TRLR	FLTPULLER	Electric	9/17/2025
212	23453	2.0%	VAN	FL23	Gas	7/22/2024
213	99829	2.3%	VACUUM TRUCK	FL46	Electric	1/22/2024
214	64094	2.3%	SERVICE BUCKET TRUCK	FL64	Electric	1/23/2024
215	E11082	2.3%	TRENCHER	FLE11B	Electric	2/1/2024
216	E36031	2.3%	EXCAVATOR	FLE36	Electric	2/12/2024
217	23714	2.3%	VAN	FL23	Gas	11/4/2024
218	E90006	2.3%	PERSONNEL CARRIER	FLE90	Gas	4/25/2025
219	E10709	2.3%	OIL FILTER TRLR	FLTOILFLTR	Electric	5/8/2025
220	82818	2.3%	BUCKET TRUCK	FL82	Common	5/19/2025
221	23629	2.3%	VAN	FL23	Gas	5/22/2025
222	E81827	2.3%	FLEX TRACK	FLE78	Electric	6/13/2025
223	23002	2.3%	VAN	FL23	Common	7/28/2025
224	E20118	2.3%	BACKHOE	FLE20	Electric	7/29/2025
225	E10817	2.3%	TRENCHER	FLE11A	Gas	7/30/2025
226	E73024	2.3%	EXCAVATOR	FLE73	Gas	8/22/2025
227	90088	2.3%	SERVICE TRUCK	FL90	Gas	8/25/2025
228	E10054	2.3%	TRENCHER	FLE11A	Gas	9/3/2025
229	E99947	2.3%	DOZER	FLE30	Common	9/15/2025
230	89007	2.3%	BUCKET TRUCK	FL89	Common	9/17/2025
231	89427	2.3%	BUCKET TRUCK	FL89	Common	9/17/2025
232	E20174	2.3%	BACKHOE	FLE20	Gas	9/17/2025
233	E81806	2.3%	FLEX TRACK	FLE78	Electric	4/4/2024
234	22624	2.3%	PICKUP	FL22	Gas	9/17/2025
235	77833	2.3%	DIGGER DERRICK	FL77	Electric	9/17/2025
236	E10138	2.4%	TRENCHER	FLE11B	Gas	8/11/2025
237	E10008	2.4%	TRENCHER	FLE11B	Gas	8/26/2025
238	E36847	2.4%	EXCAVATOR	FLE36	Gas	9/8/2025
239	E25003	2.5%	TOOL CARRIER	FLE25	Gas	1/2/2024
240	E90041	2.7%	PERSONNEL CARRIER	FLE90	Common	5/1/2025
241	E11894	2.7%	TRENCHER	FLE11A	Electric	5/9/2025
242	E10887	2.7%	TRENCHER	FLE11A	Gas	8/5/2025
243	59080	2.7%	FLATBED/STAKE RACK	FL59	Gas	9/4/2025
244	E95037	2.7%	PLATFORM LIFT	FLE95A	Gas	9/5/2025
245	55012	2.7%	DUMP TRUCK	FL55	Gas	9/8/2025
246	E90126	2.7%	PERSONNEL CARRIER	FLE90	Electric	9/15/2025
247	89037	2.7%	BUCKET TRUCK	FL89	Common	9/17/2025
248	89397	2.7%	BUCKET TRUCK	FL89	Common	9/17/2025
249	E26001	2.7%	COMPACT LOADER	FLE26	Electric	9/17/2025
250	E10845	2.9%	TRENCHER	FLE11A	Gas	10/25/2024
251	E11207	2.9%	TRENCHER	FLE11C	Gas	5/19/2025

	A	B	C	D	E	F
1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
252	E11263	2.9%	TRENCHER	FLE11B	Electric	8/12/2025
253	E90827	2.9%	PERSONNEL CARRIER	FLE90	Gas	8/25/2025
254	E10114	3.0%	TRENCHER	FLE11A	Electric	9/5/2025
255	E26003	3.1%	EXCAVATOR	FLE36	Gas	1/22/2024
256	E99546	3.1%	UTILITY TRACTOR	FLE23	Gas	11/7/2024
257	E90897	3.1%	PERSONNEL CARRIER	FLE90	Gas	4/15/2025
258	E95030	3.1%	PLATFORM LIFT	FLE95A	Electric	4/17/2025
259	E90007	3.1%	PERSONNEL CARRIER	FLE90	Common	4/29/2025
260	E99808	3.1%	DOZER	FLE30	Gas	5/1/2025
261	59026	3.1%	FLATBED/STAKE RACK	FL59	Gas	6/5/2025
262	36155	3.1%	PICKUP	FL36	Electric	7/9/2025
263	E11217	3.1%	TRENCHER	FLE11A	Gas	7/31/2025
264	E20069	3.1%	BACKHOE	FLE20	Common	8/7/2025
265	54003	3.1%	DUMP TRUCK	FL54	Electric	9/3/2025
266	98004	3.1%	CRANE	FL98	Electric	9/8/2025
267	85016	3.1%	OTR TRACTOR	FL85A	Electric	9/11/2025
268	24034	3.1%	VAN	FL23	Gas	9/17/2025
269	28477	3.1%	PICKUP	FL28	Gas	9/17/2025
270	32058	3.1%	PICKUP	FL22	Electric	9/17/2025
271	75032	3.1%	DIGGER DERRICK	FL75	Common	9/17/2025
272	77067	3.1%	DIGGER DERRICK	FL77	Common	9/17/2025
273	E10053	3.1%	TRENCHER	FLE11A	Gas	9/18/2024
274	E20013	3.1%	BACKHOE	FLE20	Gas	6/26/2024
275	28060	3.3%	PICKUP	FL28	Electric	7/24/2024
276	28277	3.3%	PICKUP	FL28	Electric	8/28/2025
277	25101	3.3%	VAN	FL23	Gas	11/26/2024
278	E95014	3.4%	PLATFORM LIFT	FLE95A	Electric	2/22/2024
279	29018	3.4%	PICKUP	FL28	Electric	8/15/2024
280	E93006	3.4%	LAWN MOWER	FLE93	Gas	4/24/2025
281	E94001	3.4%	CABLE PULLING TRLR	FLTPULLER	Electric	4/30/2025
282	E95292	3.4%	PLATFORM LIFT	FLE95A	Common	4/30/2025
283	E36986	3.4%	EXCAVATOR	FLE36	Gas	5/2/2025
284	E94012	3.4%	CABLE PULLING TRLR	FLTPULLER	Electric	5/8/2025
285	E36764	3.4%	EXCAVATOR	FLE36	Gas	5/12/2025
286	59014	3.4%	FLEET SERVICE TRUCK	FL45	Gas	5/21/2025
287	07409	3.4%	SUV	FL07	Gas	5/29/2025
288	54947	3.4%	DUMP TRUCK	FL54	Gas	7/28/2025
289	E10093	3.4%	TRENCHER	FLE11A	Gas	7/31/2025
290	E10148	3.4%	TRENCHER	FLE11B	Gas	8/11/2025
291	23651	3.4%	VAN	FL23	Common	8/20/2025
292	E10024	3.4%	TRENCHER	FLE11A	Gas	8/29/2025
293	E26060	3.4%	COMPACT LOADER	FLE26	Electric	8/29/2025
294	99038	3.4%	VACUUM TRUCK	FL46	Electric	9/5/2025
295	28768	3.4%	PICKUP	FL28	Gas	9/10/2025
296	E15855	3.4%	TRENCHER	FLE11C	Electric	9/11/2025
297	E22851	3.4%	COMPACT LOADER	FLE26	Gas	9/11/2025
298	E10806	3.4%	TRENCHER	FLE11A	Gas	9/15/2025
299	22131	3.4%	PICKUP	FL22	Common	9/16/2025
300	59004	3.4%	FLATBED/STAKE RACK	FL59	Gas	9/16/2025
301	E10816	3.4%	TRENCHER	FLE11A	Gas	9/17/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
302	E10018	3.8%	TRENCHER	FLE11B	Gas	8/26/2025
303	83078	3.8%	FLATBED/STAKE RACK	FL83	Gas	9/9/2025
304	83238	3.8%	FLATBED/STAKE RACK	FL83	Gas	9/12/2025
305	06121	3.8%	SEDAN	FL06	Gas	9/19/2024
306	E90137	3.8%	PERSONNEL CARRIER	FLE90	Electric	3/14/2025
307	33338	3.8%	VAN	FL23	Electric	6/12/2025
308	82035	3.8%	BUCKET TRUCK	FL82	Electric	8/29/2025
309	E11036	3.8%	TRENCHER	FLE11A	Gas	9/4/2025
310	E10083	3.8%	TRENCHER	FLE11A	Gas	9/12/2025
311	23111	3.8%	VAN	FL23	Gas	9/16/2025
312	28693	3.8%	PICKUP	FL28	Electric	9/17/2025
313	90068	3.8%	SERVICE TRUCK	FL90	Gas	9/17/2025
314	E22016	3.8%	UTILITY TRACTOR	FLE23	Gas	9/17/2025
315	22351	3.9%	PICKUP	FL22	Gas	7/30/2024
316	E11117	4.1%	TRENCHER	FLE11C	Electric	8/14/2024
317	E90009	4.2%	PERSONNEL CARRIER	FLE90	Common	5/7/2025
318	E10847	4.2%	TRENCHER	FLE11A	Common	5/29/2025
319	E90056	4.2%	PERSONNEL CARRIER	FLE90	Electric	6/4/2025
320	23224	4.2%	VAN	FL23	Gas	7/23/2025
321	12339	4.2%	SUV	FL07	Electric	7/24/2025
322	E90845	4.2%	PERSONNEL CARRIER	FLE90	Gas	8/21/2025
323	98012	4.2%	CRANE	FL98	Gas	8/26/2025
324	54052	4.2%	DUMP TRUCK	FL54	Electric	9/10/2025
325	98002	4.2%	CRANE	FL98	Electric	9/10/2025
326	86047	4.2%	FLATBED/STAKE RACK	FL86A	Electric	9/12/2025
327	E73808	4.2%	WHEEL LOADER	FLE73	Gas	9/15/2025
328	23334	4.2%	VAN	FL23	Gas	9/16/2025
329	36182	4.2%	PICKUP	FL36	Electric	9/16/2025
330	E11031	4.2%	TRENCHER	FLE11C	Gas	9/16/2025
331	E11125	4.2%	TRENCHER	FLE11B	Gas	9/17/2025
332	E25816	4.3%	TOOL CARRIER	FLE25	Gas	2/29/2024
333	E10198	4.3%	TRENCHER	FLE11B	Gas	7/10/2025
334	E10805	4.3%	TRENCHER	FLE11A	Gas	8/27/2025
335	22018	4.3%	PICKUP	FL_22C	Gas	1/4/2024
336	38848	4.3%	PICKUP	FL28	Gas	1/25/2024
337	E81858	4.5%	FLEX TRACK	FLE78	Electric	4/3/2024
338	22344	4.5%	PICKUP	FL22	Gas	9/9/2025
339	22444	4.5%	PICKUP	FL22	Gas	9/15/2025
340	22394	4.5%	PICKUP	FL22	Gas	9/16/2025
341	E90146	4.6%	PERSONNEL CARRIER	FLE90	Gas	10/9/2024
342	E90018	4.6%	PERSONNEL CARRIER	FLE90	Gas	11/21/2024
343	E79014	4.6%	DIRECTIONAL DRILL	FLE79	Electric	3/27/2025
344	E90030	4.6%	PERSONNEL CARRIER	FLE90	Electric	4/17/2025
345	E90052	4.6%	PERSONNEL CARRIER	FLE90	Common	5/8/2025
346	59175	4.6%	FLATBED/STAKE RACK	FL59	Gas	7/28/2025
347	E10062	4.6%	TRENCHER	FLE11A	Electric	8/7/2025
348	28453	4.6%	PICKUP	FL28	Electric	8/12/2025
349	E10807	4.6%	TRENCHER	FLE11A	Electric	8/21/2025
350	E95007	4.6%	PLATFORM LIFT	FLE95A	Electric	8/22/2025
351	06223	4.6%	SEDAN	FL06	Electric	8/28/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
352	E90901	4.6%	PERSONNEL CARRIER	FLE90	Electric	9/4/2025
353	65071	4.6%	STREETLIGHT TRUCK	FL65	Electric	9/9/2025
354	54082	4.6%	DUMP TRUCK	FL54	Gas	9/10/2025
355	E10022	4.6%	TRENCHER	FLE11A	Electric	9/11/2025
356	E20214	4.6%	BACKHOE	FLE20	Electric	9/11/2025
357	96021	4.6%	BUCKET TRUCK	FL96	Electric	9/12/2025
358	85054	4.6%	OTR TRACTOR	FL85A	Electric	9/15/2025
359	E36807	4.6%	EXCAVATOR	FLE36	Gas	9/16/2025
360	E11243	4.6%	TRENCHER	FLE11B	Electric	9/17/2025
361	E36023	4.8%	EXCAVATOR	FLE36	Gas	12/12/2024
362	E36081	4.8%	EXCAVATOR	FLE36	Gas	5/8/2025
363	E90825	4.8%	PERSONNEL CARRIER	FLE90	Gas	9/8/2025
364	83048	4.8%	FLATBED/STAKE RACK	FL83	Gas	9/9/2025
365	E11086	4.8%	TRENCHER	FLE11B	Gas	9/11/2025
366	E90035	5.0%	PERSONNEL CARRIER	FLE90	Electric	5/2/2025
367	E90014	5.0%	PERSONNEL CARRIER	FLE90	Electric	5/5/2025
368	E12013	5.0%	WELDER	FLE53	Electric	5/7/2025
369	E99898	5.0%	PERSONNEL CARRIER	FLE90	Electric	8/12/2025
370	E30895	5.0%	EXCAVATOR	FLE73	Gas	8/14/2025
371	E11216	5.0%	TRENCHER	FLE11C	Electric	8/20/2025
372	E80047	5.0%	FLEX TRACK	FLE78	Electric	8/20/2025
373	E10877	5.0%	TRENCHER	FLE11A	Gas	8/27/2025
374	28218	5.0%	PICKUP	FL28	Common	8/29/2025
375	E10894	5.0%	TRENCHER	FLE11A	Gas	8/29/2025
376	68374	5.0%	VAN	FL68	Gas	9/11/2025
377	44085	5.0%	GAS SERVICE TRUCK	FL44	Gas	9/12/2025
378	06299	5.0%	SEDAN	FL06	Gas	9/15/2025
379	28053	5.0%	PICKUP	FL28	Gas	9/15/2025
380	23634	5.0%	VAN	FL23	Gas	9/16/2025
381	28540	5.0%	PICKUP	FL28	Electric	9/17/2025
382	59050	5.0%	FLATBED/STAKE RACK	FL59	Gas	9/17/2025
383	20028	5.1%	PICKUP	FL22	Electric	9/5/2024
384	E79806	5.2%	DIRECTIONAL DRILL	FLE79	Gas	5/9/2025
385	E79111	5.2%	DIRECTIONAL DRILL	FLE79	Gas	7/22/2025
386	E79114	5.2%	DIRECTIONAL DRILL	FLE79	Gas	9/11/2025
387	41077	5.3%	PICKUP	FL41	Gas	4/17/2024
388	E90817	5.3%	PERSONNEL CARRIER	FLE90	Electric	3/17/2025
389	E94004	5.3%	CABLE PULLING TRLR	FLTPULLER	Electric	4/16/2025
390	E11253	5.3%	TRENCHER	FLE11B	Electric	4/23/2025
391	E20031	5.3%	BACKHOE	FLE20	Electric	5/2/2025
392	59122	5.3%	FLATBED/STAKE RACK	FL59	Gas	6/5/2025
393	36101	5.3%	PICKUP	FL36	Electric	7/2/2025
394	86000	5.3%	FLATBED/STAKE RACK	FL86A	Electric	7/30/2025
395	E10897	5.3%	TRENCHER	FLE11A	Gas	8/6/2025
396	E80002	5.3%	FLEX TRACK	FLE78	Electric	8/8/2025
397	E11101	5.3%	TRENCHER	FLE11A	Electric	8/27/2025
398	E90001	5.3%	PERSONNEL CARRIER	FLE90	Gas	9/8/2025
399	22215	5.3%	PICKUP	FL22	Gas	9/9/2025
400	E20033	5.3%	BACKHOE	FLE20	Gas	9/11/2025
401	67003	5.3%	ELECTRIC SERVICE TRUCK	FL67	Electric	9/12/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
402	E10033	5.3%	TRENCHER	FLE11A	Gas	9/12/2025
403	E11866	5.3%	TRENCHER	FLE11A	Gas	9/12/2025
404	38232	5.3%	PICKUP	FL28	Gas	9/16/2025
405	59040	5.3%	FLATBED/STAKE RACK	FL59	Gas	9/17/2025
406	75051	5.3%	DIGGER DERRICK	FL75	Electric	9/17/2025
407	96199	5.3%	BUCKET TRUCK	FL96	Electric	9/17/2025
408	E10004	5.5%	TRENCHER	FLE11A	Gas	3/14/2024
409	44128	5.7%	GAS SERVICE TRUCK	FL44	Gas	12/10/2024
410	E90023	5.7%	PERSONNEL CARRIER	FLE90	Electric	5/8/2025
411	E36233	5.7%	EXCAVATOR	FLE36	Gas	5/9/2025
412	E11065	5.7%	TRENCHER	FLE11B	Electric	7/24/2025
413	22526	5.7%	PICKUP	FL22	Gas	8/14/2025
414	90054	5.7%	SERVICE TRUCK	FL90	Electric	9/9/2025
415	22004	5.7%	PICKUP	FL22	Gas	9/12/2025
416	59152	5.7%	FLATBED/STAKE RACK	FL59	Gas	9/17/2025
417	85124	5.7%	OTR TRACTOR	FL85A	Electric	9/17/2025
418	E10044	5.7%	TRENCHER	FLE11A	Gas	9/17/2025
419	E10003	6.1%	TRENCHER	FLE11A	Gas	11/13/2024
420	28050	6.1%	PICKUP	FL28	Electric	11/19/2024
421	E11095	6.1%	TRENCHER	FLE11B	Common	4/28/2025
422	90124	6.1%	SERVICE TRUCK	FL90	Gas	8/18/2025
423	20023	6.1%	PICKUP	FL22	Common	8/22/2025
424	22042	6.1%	PICKUP	FL22	Electric	9/2/2025
425	99013	6.1%	VAN	FL68	Gas	9/12/2025
426	E20164	6.1%	BACKHOE	FLE20	Gas	9/15/2025
427	28132	6.1%	PICKUP	FL28	Electric	9/17/2025
428	E20133	6.1%	BACKHOE	FLE20	Gas	9/17/2025
429	06071	6.2%	SEDAN	FL06	Common	3/6/2024
430	E75100	6.2%	DOZER	FLE30	Gas	6/30/2025
431	83178	6.2%	FLATBED/STAKE RACK	FL83	Gas	9/15/2025
432	E20154	6.2%	BACKHOE	FLE20	Gas	9/16/2025
433	90023	6.2%	SERVICE TRUCK	FL90	Gas	9/17/2025
434	22051	6.3%	PICKUP	FL22	Electric	11/14/2024
435	E10034	6.4%	TRENCHER	FLE11A	Electric	9/16/2025
436	E11177	6.4%	TRENCHER	FLE11C	Electric	2/14/2024
437	28072	6.4%	PICKUP	FL28	Gas	9/5/2024
438	23924	6.4%	VAN	FL23	Electric	9/17/2025
439	E99853	6.5%	DOZER	FLE30	Gas	4/18/2025
440	E26002	6.5%	COMPACT LOADER	FLE26	Electric	5/8/2025
441	E36826	6.5%	EXCAVATOR	FLE36	Gas	6/13/2025
442	59149	6.5%	FLATBED/STAKE RACK	FL59	Gas	7/10/2025
443	06099	6.5%	SEDAN	FL06	Common	7/22/2025
444	E10818	6.5%	TRENCHER	FLE11A	Gas	8/13/2025
445	E10174	6.5%	TRENCHER	FLE11A	Gas	8/15/2025
446	E10058	6.5%	TRENCHER	FLE11B	Gas	9/2/2025
447	E20084	6.5%	BACKHOE	FLE20	Gas	9/2/2025
448	E90016	6.5%	PERSONNEL CARRIER	FLE90	Electric	9/2/2025
449	45049	6.5%	FLEET SERVICE TRUCK	FL45	Common	9/3/2025
450	E10052	6.5%	TRENCHER	FLE11A	Gas	9/12/2025
451	E11956	6.5%	TRENCHER	FLE11B	Electric	9/15/2025

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452	E81829	6.5%	FLEX TRACK	FLE82	Electric	9/15/2025
453	E95025	6.5%	PLATFORM LIFT	FLE95A	Electric	9/15/2025
454	27155	6.5%	PICKUP	FL27B	Gas	9/17/2025
455	39080	6.5%	CARGO VAN	FL39	Electric	9/17/2025
456	E11185	6.5%	TRENCHER	FLE11B	Common	9/17/2025
457	E20088	6.5%	BACKHOE	FLE20	Gas	9/17/2025
458	E90020	6.5%	PERSONNEL CARRIER	FLE90	Common	9/17/2025
459	E79823	6.6%	DIRECTIONAL DRILL	FLE79	Gas	4/2/2025
460	E79031	6.7%	DIRECTIONAL DRILL	FLE79	Gas	5/5/2025
461	E36967	6.7%	EXCAVATOR	FLE36	Gas	5/16/2025
462	64165	6.8%	SERVICE BUCKET TRUCK	FL64	Electric	1/24/2024
463	25091	6.8%	VAN	FL23	Electric	2/1/2024
464	E79994	6.9%	DIRECTIONAL DRILL	FLE79	Gas	12/16/2024
465	E95006	6.9%	PLATFORM LIFT	FLE95A	Electric	5/29/2025
466	E11805	6.9%	TRENCHER	FLE11B	Electric	7/22/2025
467	E20163	6.9%	BACKHOE	FLE20	Gas	8/7/2025
468	44008	6.9%	GAS SERVICE TRUCK	FL44	Gas	8/22/2025
469	E20213	6.9%	BACKHOE	FLE20	Gas	9/3/2025
470	28713	6.9%	PICKUP	FL28	Electric	9/5/2025
471	22071	6.9%	PICKUP	FL22	Electric	9/9/2025
472	E80895	6.9%	FLEX TRACK	FLE78	Electric	9/10/2025
473	23189	6.9%	VAN	FL23	Gas	9/15/2025
474	E10042	6.9%	TRENCHER	FLE11A	Gas	9/15/2025
475	E20049	6.9%	BACKHOE	FLE20	Electric	9/15/2025
476	E90896	6.9%	PERSONNEL CARRIER	FLE90	Gas	9/15/2025
477	06166	6.9%	SEDAN	FL06	Electric	9/17/2025
478	07083	6.9%	SUV	FL07	Common	9/17/2025
479	E20977	6.9%	BACKHOE	FLE20	Gas	9/17/2025
480	12099	6.9%	SEDAN	FL06	Gas	5/8/2024
481	E99009	6.9%	MISC EQUIP	FLEMISC	Electric	6/10/2024
482	32409	7.0%	PICKUP	FL_22	Gas	7/2/2024
483	22574	7.0%	PICKUP	FL22	Common	9/17/2025
484	E10855	7.0%	TRENCHER	FLE11A	Gas	5/9/2024
485	33758	7.1%	VAN	FL23	Gas	11/6/2024
486	E10204	7.1%	TRENCHER	FLE11A	Gas	5/8/2025
487	E36454	7.1%	EXCAVATOR	FLE36	Gas	5/9/2025
488	E79855	7.1%	DIRECTIONAL DRILL	FLE79	Gas	5/9/2025
489	07198	7.3%	SUV	FL07	Gas	4/4/2025
490	E90081	7.3%	PERSONNEL CARRIER	FLE90	Common	5/5/2025
491	E73866	7.3%	EXCAVATOR	FLE36	Common	6/12/2025
492	E35977	7.3%	EXCAVATOR	FLE36	Gas	8/7/2025
493	39020	7.3%	CARGO VAN	FL39	Electric	8/15/2025
494	28133	7.3%	PICKUP	FL28	Gas	8/19/2025
495	E67020	7.3%	CRANE	FLE67	Electric	8/19/2025
496	99026	7.3%	VAN	FL68	Electric	8/21/2025
497	E67828	7.3%	CRANE	FLE67	Electric	8/21/2025
498	E10108	7.3%	TRENCHER	FLE11B	Gas	8/28/2025
499	59591	7.3%	FLATBED/STAKE RACK	FL59	Electric	9/10/2025
500	66011	7.3%	VAN	FL66	Electric	9/11/2025
501	07053	7.3%	SUV	FL07	Gas	9/15/2025

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502	E20012	7.3%	BACKHOE	FLE20	Gas	9/15/2025
503	59937	7.3%	FLATBED/STAKE RACK	FL59	Gas	9/16/2025
504	60052	7.3%	ELECTRIC SERVICE TRUCK	FL60	Common	9/16/2025
505	E20262	7.3%	BACKHOE	FLE20	Electric	9/17/2025
506	22054	7.6%	PICKUP	FL22	Electric	9/16/2025
507	22104	7.6%	PICKUP	FL22	Electric	9/17/2025
508	E36203	7.6%	EXCAVATOR	FLE36	Gas	5/9/2025
509	E36363	7.6%	EXCAVATOR	FLE36	Gas	5/9/2025
510	86104	7.6%	FLATBED/STAKE RACK	FL86A	Gas	8/22/2025
511	E20934	7.6%	BACKHOE	FLE20	Gas	9/16/2025
512	86029	7.6%	FLATBED/STAKE RACK	FL86A	Gas	9/17/2025
513	E26014	7.6%	COMPACT LOADER	FLE26	Gas	9/17/2025
514	E81817	7.6%	FLEX TRACK	FLE78	Electric	11/21/2024
515	E11111	7.6%	TRENCHER	FLE11A	Electric	12/27/2024
516	E75009	7.6%	DOZER	FLE30	Electric	4/4/2025
517	07141	7.6%	SUV	FL07	Gas	5/15/2025
518	E20055	7.6%	BACKHOE	FLE20	Common	8/7/2025
519	E20242	7.6%	BACKHOE	FLE20	Gas	8/7/2025
520	E10158	7.6%	TRENCHER	FLE11B	Gas	8/12/2025
521	12489	7.6%	SUV	FL07	Common	8/19/2025
522	24036	7.6%	VAN	FL23	Gas	8/19/2025
523	59007	7.6%	FLATBED/STAKE RACK	FL59	Gas	8/27/2025
524	E11061	7.6%	TRENCHER	FLE11B	Electric	8/27/2025
525	E20061	7.6%	BACKHOE	FLE20	Common	8/29/2025
526	99036	7.6%	VAN	FL68	Electric	9/1/2025
527	E81888	7.6%	FLEX TRACK	FLE78	Electric	9/5/2025
528	59062	7.6%	FLATBED/STAKE RACK	FL59	Gas	9/9/2025
529	90025	7.6%	SERVICE TRUCK	FL90	Electric	9/16/2025
530	85077	7.6%	OTR TRACTOR	FL85A	Gas	9/17/2025
531	E10013	7.6%	TRENCHER	FLE11A	Gas	9/17/2025
532	E90101	7.6%	PERSONNEL CARRIER	FLE90	Electric	9/17/2025
533	E99899	7.6%	PERSONNEL CARRIER	FLE90	Electric	9/17/2025
534	E23000	7.7%	BACKHOE	FLE20	Electric	3/19/2024
535	E11197	7.7%	TRENCHER	FLE11C	Electric	3/21/2024
536	33608	7.8%	VAN	FL23	Gas	10/2/2024
537	36083	8.0%	PICKUP	FL36	Electric	7/24/2025
538	59145	8.0%	FLATBED/STAKE RACK	FL59	Gas	8/25/2025
539	E10078	8.0%	TRENCHER	FLE11B	Gas	8/26/2025
540	E23007	8.0%	UTILITY TRACTOR	FLE23	Gas	8/28/2025
541	28580	8.0%	PICKUP	FL28	Gas	9/2/2025
542	06309	8.0%	SEDAN	FL06	Common	9/8/2025
543	E20068	8.0%	BACKHOE	FLE20	Gas	9/12/2025
544	28119	8.0%	PICKUP	FL28	Electric	9/16/2025
545	28020	8.0%	PICKUP	FL28	Electric	9/17/2025
546	38049	8.0%	PICKUP	FL28	Electric	9/17/2025
547	55104	8.0%	DUMP TRUCK	FL55	Electric	9/17/2025
548	E36644	8.1%	EXCAVATOR	FLE36	Gas	5/9/2025
549	E79908	8.1%	DIRECTIONAL DRILL	FLE79	Gas	5/9/2025
550	83158	8.1%	FLATBED/STAKE RACK	FL83	Gas	9/17/2025
551	E90017	8.4%	PERSONNEL CARRIER	FLE90	Common	5/9/2025

	A	B	C	D	E	F
1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
552	E26050	8.4%	COMPACT LOADER	FLE26	Electric	7/31/2025
553	36035	8.4%	PICKUP	FL36	Electric	8/29/2025
554	59142	8.4%	FLATBED/STAKE RACK	FL59	Gas	8/29/2025
555	65051	8.4%	STREETLIGHT TRUCK	FL65	Electric	9/2/2025
556	E20814	8.4%	BACKHOE	FLE20	Gas	9/9/2025
557	06319	8.4%	SEDAN	FL06	Common	9/11/2025
558	E95021	8.4%	PLATFORM LIFT	FLE95A	Electric	9/11/2025
559	E20644	8.4%	BACKHOE	FLE20	Gas	9/12/2025
560	E11055	8.4%	TRENCHER	FLE11B	Electric	9/15/2025
561	59019	8.4%	FLATBED/STAKE RACK	FL59	Gas	9/16/2025
562	28747	8.4%	PICKUP	FL28	Gas	9/17/2025
563	33418	8.5%	VAN	FL23	Gas	2/23/2024
564	64131	8.5%	SERVICE BUCKET TRUCK	FL64	Electric	4/9/2024
565	E36121	8.6%	EXCAVATOR	FLE36	Gas	5/8/2025
566	E36141	8.6%	EXCAVATOR	FLE36	Gas	5/9/2025
567	E10118	8.6%	TRENCHER	FLE11B	Gas	7/8/2025
568	22022	8.8%	PICKUP	FL22	Gas	7/8/2024
569	23059	8.8%	VAN	FL23	Gas	4/24/2025
570	E90078	8.8%	PERSONNEL CARRIER	FLE90	Common	5/9/2025
571	E20223	8.8%	BACKHOE	FLE20	Electric	7/17/2025
572	06066	8.8%	SEDAN	FL06	Gas	7/31/2025
573	59090	8.8%	FLATBED/STAKE RACK	FL59	Gas	7/31/2025
574	37048	8.8%	SERVICE TRUCK	FL37	Gas	8/1/2025
575	E20744	8.8%	BACKHOE	FLE20	Gas	9/5/2025
576	28000	8.8%	PICKUP	FL28	Electric	9/8/2025
577	E11206	8.8%	TRENCHER	FLE11C	Electric	9/17/2025
578	E20862	8.8%	BACKHOE	FLE20	Gas	9/17/2025
579	23319	8.9%	VAN	FL23	Gas	6/12/2025
580	E36101	9.0%	EXCAVATOR	FLE36	Gas	5/9/2025
581	E99863	9.0%	DOZER	FLE30	Gas	8/27/2025
582	26040	9.0%	PICKUP	FL26	Gas	9/16/2025
583	23182	9.2%	VAN	FL23	Gas	11/12/2024
584	28063	9.2%	PICKUP	FL28	Common	8/13/2025
585	E79825	9.2%	DIRECTIONAL DRILL	FLE79	Gas	8/13/2025
586	57010	9.2%	CRANE	FL57	Gas	8/22/2025
587	85023	9.2%	OTR TRACTOR	FL85A	Common	8/26/2025
588	23049	9.2%	VAN	FL23	Common	8/27/2025
589	E20234	9.2%	BACKHOE	FLE20	Gas	8/29/2025
590	E11073	9.2%	TRENCHER	FLE11B	Gas	9/8/2025
591	57000	9.2%	CRANE	FL57	Electric	9/10/2025
592	E90088	9.2%	PERSONNEL CARRIER	FLE90	Electric	9/12/2025
593	E10875	9.2%	TRENCHER	FLE11A	Gas	9/15/2025
594	22112	9.2%	PICKUP	FL22	Gas	9/16/2025
595	36299	9.2%	PICKUP	FL36	Electric	9/17/2025
596	E20224	9.2%	BACKHOE	FLE20	Gas	9/17/2025
597	12109	9.2%	SUV	FL07	Electric	8/26/2024
598	22544	9.3%	PICKUP	FL22	Common	9/17/2025
599	E26005	9.5%	COMPACT LOADER	FLE26	Gas	9/16/2025
600	E11835	9.5%	TRENCHER	FLE11B	Electric	4/24/2025
601	59000	9.5%	DRIP TRUCK	FL59	Gas	7/22/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
602	E35997	9.5%	EXCAVATOR	FLE36	Gas	8/8/2025
603	30419	9.5%	PICKUP	FL22	Gas	8/18/2025
604	E23816	9.5%	UTILITY TRACTOR	FLE23	Gas	8/21/2025
605	38201	9.5%	PICKUP	FL28	Common	9/5/2025
606	E67001	9.5%	CRANE	FLE67	Electric	9/5/2025
607	E81865	9.5%	FLEX TRACK	FLE78	Electric	9/9/2025
608	39040	9.5%	CARGO VAN	FL39	Electric	9/10/2025
609	E11203	9.5%	TRENCHER	FLE11B	Electric	9/11/2025
610	E93011	9.5%	LAWN MOWER	FLE93	Electric	9/11/2025
611	06122	9.5%	SEDAN	FL06	Common	9/15/2025
612	28281	9.5%	PICKUP	FL28	Gas	9/15/2025
613	E10827	9.5%	TRENCHER	FLE11A	Gas	9/15/2025
614	E22802	9.5%	COMPACT LOADER	FLE26	Gas	9/15/2025
615	E10084	9.5%	TRENCHER	FLE11A	Gas	9/16/2025
616	E30018	9.5%	EXCAVATOR	FLE36	Gas	9/16/2025
617	E60290	9.5%	FORKLIFT	FLE60	Gas	9/16/2025
618	E90086	9.5%	PERSONNEL CARRIER	FLE90	Electric	9/17/2025
619	23643	9.9%	VAN	FL23	Gas	12/18/2024
620	E90108	9.9%	PERSONNEL CARRIER	FLE90	Common	5/1/2025
621	23573	9.9%	VAN	FL23	Gas	5/21/2025
622	E30011	9.9%	DOZER	FLE30	Common	8/15/2025
623	54324	9.9%	DUMP TRUCK	FL54	Gas	8/18/2025
624	22180	9.9%	PICKUP	FL22	Electric	8/26/2025
625	E20172	9.9%	BACKHOE	FLE20	Gas	9/10/2025
626	22016	9.9%	PICKUP	FL22	Electric	9/11/2025
627	E81856	9.9%	FLEX TRACK	FLE82	Electric	9/15/2025
628	59112	9.9%	FLATBED/STAKE RACK	FL59	Gas	9/16/2025
629	90039	9.9%	SERVICE TRUCK	FL90	Electric	9/16/2025
630	90078	9.9%	SERVICE TRUCK	FL90	Gas	9/16/2025
631	28257	9.9%	PICKUP	FL28	Electric	9/17/2025
632	85034	9.9%	OTR TRACTOR	FL85A	Electric	9/17/2025
633	75878	10.2%	DIGGER DERRICK	FL75	Electric	2/3/2025
634	E10194	10.2%	TRENCHER	FLE11A	Gas	6/14/2024
635	E11808	10.3%	TRENCHER	FLE11A	Gas	4/25/2025
636	E30892	10.3%	EXCAVATOR	FLE73	Gas	6/24/2025
637	59135	10.3%	FLATBED/STAKE RACK	FL59	Gas	8/1/2025
638	E26080	10.3%	COMPACT LOADER	FLE26	Electric	8/22/2025
639	43012	10.3%	DUMP TRUCK	FL43	Electric	8/25/2025
640	23363	10.3%	VAN	FL23	Gas	9/8/2025
641	66005	10.3%	VAN	FL66	Electric	9/9/2025
642	44069	10.3%	GAS SERVICE TRUCK	FL44	Gas	9/12/2025
643	E90042	10.3%	PERSONNEL CARRIER	FLE90	Common	9/12/2025
644	32819	10.3%	PICKUP	FL22	Gas	9/15/2025
645	E26010	10.3%	COMPACT LOADER	FLE26	Electric	9/16/2025
646	E73014	10.3%	WHEEL LOADER	FLE73	Gas	9/16/2025
647	06348	10.3%	SEDAN	FL06	Common	9/17/2025
648	07073	10.3%	SUV	FL07	Common	9/17/2025
649	27103	10.3%	PICKUP	FL27B	Gas	9/17/2025
650	99822	10.5%	CUBE VAN	FL84	Gas	9/5/2025
651	E36334	10.5%	EXCAVATOR	FLE36	Gas	5/9/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
652	E25043	10.5%	TOOL CARRIER	FLE25	Gas	8/18/2025
653	E79024	10.5%	DIRECTIONAL DRILL	FLE79	Gas	9/3/2025
654	E10218	10.5%	TRENCHER	FLE11B	Gas	9/17/2025
655	E25013	10.5%	TOOL CARRIER	FLE25	Gas	9/17/2025
656	32469	10.6%	PICKUP	FL22	Electric	9/9/2025
657	28017	10.7%	PICKUP	FL28	Electric	8/23/2024
658	E90098	10.7%	PERSONNEL CARRIER	FLE90	Common	5/8/2025
659	90043	10.7%	SERVICE TRUCK	FL90	Gas	6/13/2025
660	57040	10.7%	CRANE	FL57	Electric	7/16/2025
661	E99878	10.7%	PERSONNEL CARRIER	FLE90	Electric	7/30/2025
662	E26000	10.7%	COMPACT LOADER	FLE26	Electric	8/19/2025
663	E36397	10.7%	EXCAVATOR	FLE36	Gas	9/3/2025
664	28285	10.7%	PICKUP	FL28	Electric	9/4/2025
665	22091	10.7%	PICKUP	FL22	Common	9/9/2025
666	E11998	10.7%	TRENCHER	FLE11C	Electric	9/10/2025
667	E11091	10.7%	TRENCHER	FLE11C	Electric	9/11/2025
668	E36832	10.7%	EXCAVATOR	FLE36	Electric	9/11/2025
669	E79151	10.7%	DIRECTIONAL DRILL	FLE79	Electric	9/11/2025
670	E90176	10.7%	PERSONNEL CARRIER	FLE90	Gas	9/12/2025
671	24054	10.7%	VAN	FL23	Gas	9/15/2025
672	06091	10.7%	SEDAN	FL06	Common	9/17/2025
673	22083	10.7%	PICKUP	FL22	Electric	9/17/2025
674	22233	10.7%	PICKUP	FL22	Electric	9/17/2025
675	28473	10.7%	PICKUP	FL28	Electric	9/17/2025
676	60091	10.7%	ELECTRIC SERVICE TRUCK	FL60	Electric	9/17/2025
677	77169	10.7%	DIGGER DERRICK	FL77	Common	9/17/2025
678	E20011	10.7%	BACKHOE	FLE20	Gas	9/17/2025
679	E79872	10.7%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
680	28848	10.9%	PICKUP	FL28	Electric	7/24/2024
681	E22805	11.0%	COMPACT LOADER	FLE26	Gas	8/6/2025
682	28070	11.0%	PICKUP	FL28	Gas	9/30/2024
683	57070	11.1%	CRANE	FL57	Electric	8/15/2025
684	E23806	11.1%	UTILITY TRACTOR	FLE23	Gas	8/15/2025
685	E43817	11.1%	AIR COMPRESSOR	FLE43	Gas	8/18/2025
686	E81836	11.1%	FLEX TRACK	FLE78	Electric	8/21/2025
687	E81807	11.1%	FLEX TRACK	FLE78	Electric	8/25/2025
688	28351	11.1%	PICKUP	FL28	Common	9/2/2025
689	66001	11.1%	VAN	FL66	Electric	9/3/2025
690	E36696	11.1%	EXCAVATOR	FLE36	Electric	9/3/2025
691	E60014	11.1%	FORKLIFT	FLE60	Common	9/8/2025
692	E81896	11.1%	FLEX TRACK	FLE78	Electric	9/11/2025
693	28325	11.1%	PICKUP	FL28	Gas	9/12/2025
694	36212	11.1%	PICKUP	FL36	Electric	9/15/2025
695	60149	11.1%	ELECTRIC SERVICE TRUCK	FL60	Electric	9/15/2025
696	85134	11.1%	OTR TRACTOR	FL85A	Electric	9/15/2025
697	23012	11.1%	VAN	FL23	Common	9/17/2025
698	E90058	11.1%	PERSONNEL CARRIER	FLE90	Gas	9/17/2025
699	E11127	11.4%	TRENCHER	FLE11A	Gas	8/27/2025
700	23053	11.5%	VAN	FL23	Gas	7/31/2024
701	22376	11.5%	PICKUP	FL22	Electric	1/2/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
702	E26025	11.5%	COMPACT LOADER	FLE26	Gas	5/9/2025
703	44098	11.5%	GAS SERVICE TRUCK	FL44	Gas	5/19/2025
704	E79026	11.5%	DIRECTIONAL DRILL	FLE79	Gas	7/11/2025
705	E11010	11.5%	TRENCHER	FLE11C	Common	8/7/2025
706	83842	11.5%	FLATBED/STAKE RACK	FL83	Electric	9/3/2025
707	85144	11.5%	OTR TRACTOR	FL85A	Common	9/8/2025
708	59061	11.5%	FLATBED/STAKE RACK	FL59	Gas	9/10/2025
709	28838	11.5%	PICKUP	FL28	Gas	9/11/2025
710	07001	11.5%	SUV	FL07	Electric	9/16/2025
711	28002	11.5%	PICKUP	FL28	Electric	9/16/2025
712	28297	11.5%	PICKUP	FL28	Electric	9/16/2025
713	06171	11.5%	SEDAN	FL06	Gas	9/17/2025
714	22656	11.5%	PICKUP	FL22	Common	9/17/2025
715	28162	11.5%	PICKUP	FL28	Gas	9/17/2025
716	45042	11.5%	FLEET SERVICE TRUCK	FL45	Common	9/17/2025
717	36013	11.8%	PICKUP	FL36	Electric	7/31/2024
718	E94000	11.8%	CABLE PULLING TRLR	FLTPULLER	Electric	12/17/2024
719	E11170	11.8%	TRENCHER	FLE11A	Electric	6/5/2025
720	E90076	11.8%	PERSONNEL CARRIER	FLE90	Electric	8/1/2025
721	98072	11.8%	CRANE	FL98	Gas	8/14/2025
722	28752	11.8%	PICKUP	FL28	Common	8/20/2025
723	E73004	11.8%	WHEEL LOADER	FLE73	Electric	9/4/2025
724	85013	11.8%	OTR TRACTOR	FL85A	Common	9/8/2025
725	57012	11.8%	CRANE	FL57	Electric	9/10/2025
726	E10214	11.8%	TRENCHER	FLE11A	Gas	9/12/2025
727	28675	11.8%	PICKUP	FL28	Common	9/15/2025
728	39059	11.8%	CARGO VAN	FL39	Electric	9/15/2025
729	E36027	11.8%	EXCAVATOR	FLE36	Gas	9/15/2025
730	E79054	11.9%	DIRECTIONAL DRILL	FLE79	Gas	1/28/2025
731	E20134	11.9%	BACKHOE	FLE20	Gas	9/4/2025
732	59085	11.9%	FLATBED/STAKE RACK	FL59	Gas	9/12/2025
733	E20202	11.9%	BACKHOE	FLE20	Gas	9/17/2025
734	E25054	12.0%	TOOL CARRIER	FLE25	Gas	3/21/2024
735	E20313	12.1%	BACKHOE	FLE20	Electric	9/9/2025
736	36017	12.2%	PICKUP	FL36	Electric	11/29/2024
737	25020	12.2%	VAN	FL23	Gas	1/17/2025
738	E35987	12.2%	EXCAVATOR	FLE36	Gas	8/7/2025
739	07033	12.2%	SUV	FL07	Gas	8/28/2025
740	E20830	12.2%	BACKHOE	FLE20	Electric	8/29/2025
741	06349	12.2%	SEDAN	FL06	Gas	9/4/2025
742	E36045	12.2%	EXCAVATOR	FLE36	Gas	9/4/2025
743	85022	12.2%	OTR TRACTOR	FL85A	Electric	9/8/2025
744	23159	12.2%	VAN	FL23	Gas	9/9/2025
745	E90116	12.2%	PERSONNEL CARRIER	FLE90	Electric	9/10/2025
746	E11102	12.2%	TRENCHER	FLE11B	Electric	9/11/2025
747	E11202	12.2%	TRENCHER	FLE11B	Electric	9/15/2025
748	E11092	12.2%	TRENCHER	FLE11B	Electric	9/16/2025
749	E90106	12.2%	PERSONNEL CARRIER	FLE90	Electric	9/16/2025
750	64171	12.3%	SERVICE BUCKET TRUCK	FL64	Electric	1/30/2024
751	E11825	12.4%	TRENCHER	FLE11B	Gas	8/12/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
752	E11804	12.4%	TRENCHER	FLE11A	Gas	9/9/2025
753	06161	12.5%	SEDAN	FL06	Common	9/12/2025
754	E79066	12.6%	DIRECTIONAL DRILL	FLE79	Common	3/26/2025
755	E79046	12.6%	DIRECTIONAL DRILL	FLE79	Gas	8/20/2025
756	45065	12.6%	FLEET SERVICE TRUCK	FL45	Common	8/22/2025
757	E20029	12.6%	BACKHOE	FLE20	Electric	9/9/2025
758	90093	12.6%	SERVICE TRUCK	FL90	Electric	9/11/2025
759	E36035	12.6%	EXCAVATOR	FLE36	Gas	9/11/2025
760	28327	12.6%	PICKUP	FL28	Common	9/12/2025
761	E20203	12.6%	BACKHOE	FLE20	Gas	9/15/2025
762	59172	12.6%	FLATBED/STAKE RACK	FL59	Gas	9/16/2025
763	06002	12.6%	SEDAN	FL06	Gas	9/17/2025
764	07018	12.6%	SUV	FL07	Electric	9/17/2025
765	07021	12.6%	SUV	FL07	Gas	9/17/2025
766	28321	12.6%	PICKUP	FL28	Gas	9/17/2025
767	59839	12.6%	FLATBED/STAKE RACK	FL59	Gas	9/17/2025
768	60027	12.6%	ELECTRIC SERVICE TRUCK	FL60	Electric	9/17/2025
769	85067	12.6%	OTR TRACTOR	FL85A	Gas	9/17/2025
770	E20143	12.6%	BACKHOE	FLE20	Gas	9/17/2025
771	E10865	12.9%	TRENCHER	FLE11A	Gas	9/11/2025
772	07338	12.9%	SUV	FL07	Gas	9/17/2025
773	E20935	12.9%	BACKHOE	FLE20	Gas	9/17/2025
774	E20124	12.9%	BACKHOE	FLE20	Gas	9/11/2025
775	E11081	13.0%	TRENCHER	FLE11C	Electric	9/27/2024
776	E81777	13.0%	FLEX TRACK	FLE82	Electric	1/2/2025
777	E36114	13.0%	EXCAVATOR	FLE36	Gas	7/22/2025
778	89267	13.0%	BUCKET TRUCK	FL89	Electric	8/15/2025
779	E11053	13.0%	TRENCHER	FLE11B	Electric	9/4/2025
780	36003	13.0%	PICKUP	FL36	Electric	9/10/2025
781	07739	13.0%	SUV	FL07	Gas	9/11/2025
782	85012	13.0%	OTR TRACTOR	FL85A	Electric	9/15/2025
783	E36427	13.0%	EXCAVATOR	FLE36	Gas	9/15/2025
784	E60107	13.0%	FORKLIFT	FLE60	Gas	9/15/2025
785	22672	13.0%	PICKUP	FL22	Electric	9/17/2025
786	25378	13.0%	VAN	FL23	Common	9/17/2025
787	22648	13.3%	PICKUP	FL22	Gas	9/17/2024
788	22386	13.3%	PICKUP	FL22	Gas	11/19/2024
789	E10028	13.3%	TRENCHER	FLE11B	Gas	9/17/2025
790	23309	13.4%	VAN	FL23	Gas	12/6/2024
791	E90003	13.4%	PERSONNEL CARRIER	FLE90	Gas	3/13/2025
792	E90857	13.4%	PERSONNEL CARRIER	FLE90	Electric	5/8/2025
793	E95017	13.4%	PLATFORM LIFT	FLE95A	Electric	7/23/2025
794	06063	13.4%	SEDAN	FL06	Gas	8/26/2025
795	E11831	13.4%	TRENCHER	FLE11B	Electric	8/28/2025
796	E81846	13.4%	FLEX TRACK	FLE82	Electric	9/2/2025
797	06174	13.4%	SEDAN	FL06	Electric	9/5/2025
798	06263	13.4%	SEDAN	FL06	Electric	9/8/2025
799	E80027	13.4%	FLEX TRACK	FLE78	Electric	9/10/2025
800	E79898	13.4%	DIRECTIONAL DRILL	FLE79	Gas	9/15/2025
801	07041	13.4%	SUV	FL07	Gas	9/16/2025

	A	B	C	D	E	F
1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
802	23513	13.4%	VAN	FL23	Common	9/16/2025
803	39050	13.4%	CARGO VAN	FL39	Electric	9/16/2025
804	28408	13.4%	PICKUP	FL28	Common	9/17/2025
805	57060	13.4%	CRANE	FL57	Electric	9/17/2025
806	06239	13.4%	SEDAN	FL06	Common	9/17/2025
807	22072	13.6%	PICKUP	FL22	Electric	1/11/2024
808	38961	13.6%	PICKUP	FL28	Electric	7/30/2025
809	59954	13.6%	FLATBED/STAKE RACK	FL59	Gas	9/17/2025
810	22426	13.7%	PICKUP	FL22	Electric	10/17/2024
811	22636	13.7%	PICKUP	FL22	Gas	10/23/2024
812	E23001	13.7%	BACKHOE	FLE20	Electric	8/7/2025
813	E77809	13.7%	FLEX TRACK	FLE78	Electric	8/13/2025
814	83003	13.7%	FLATBED/STAKE RACK	FL83	Common	9/4/2025
815	E36694	13.7%	EXCAVATOR	FLE36	Gas	9/10/2025
816	E15866	13.7%	TRENCHER	FLE11C	Electric	9/11/2025
817	E20071	13.7%	BACKHOE	FLE20	Electric	9/12/2025
818	28348	13.7%	PICKUP	FL28	Common	9/17/2025
819	86068	13.7%	FLATBED/STAKE RACK	FL86B	Gas	9/17/2025
820	86074	13.8%	FLATBED/STAKE RACK	FL86A	Gas	6/4/2025
821	E36474	14.1%	EXCAVATOR	FLE36	Gas	8/7/2025
822	57030	14.1%	CRANE	FL57	Electric	9/4/2025
823	55002	14.1%	DUMP TRUCK	FL55	Electric	9/9/2025
824	28382	14.1%	PICKUP	FL28	Common	9/15/2025
825	55009	14.1%	DUMP TRUCK	FL55	Electric	9/15/2025
826	57090	14.1%	CRANE	FL57	Electric	9/16/2025
827	83832	14.1%	FLATBED/STAKE RACK	FL83	Electric	9/16/2025
828	22618	14.1%	PICKUP	FL22	Gas	9/17/2025
829	85000	14.1%	OTR TRACTOR	FL85A	Electric	9/17/2025
830	90028	14.1%	SERVICE TRUCK	FL90	Gas	9/17/2025
831	90153	14.1%	SERVICE TRUCK	FL90	Electric	9/17/2025
832	E36786	14.1%	EXCAVATOR	FLE36	Gas	9/17/2025
833	E78019	14.1%	FLEX TRACK	FLE78	Electric	9/17/2025
834	33868	14.2%	VAN	FL23	Gas	10/21/2024
835	E10094	14.3%	TRENCHER	FLE11A	Gas	9/4/2025
836	E79877	14.3%	DIRECTIONAL DRILL	FLE79	Gas	9/15/2025
837	E10184	14.3%	TRENCHER	FLE11A	Gas	9/16/2025
838	E82971	14.4%	FLEX TRACK	FLE82	Electric	9/4/2025
839	E20193	14.5%	BACKHOE	FLE20	Gas	7/28/2025
840	22323	14.5%	PICKUP	FL22	Electric	8/25/2025
841	E20866	14.5%	BACKHOE	FLE20	Gas	9/4/2025
842	57102	14.5%	CRANE	FL57	Gas	9/8/2025
843	22075	14.5%	PICKUP	FL22	Gas	9/11/2025
844	59064	14.5%	FLATBED/STAKE RACK	FL59	Gas	9/12/2025
845	85064	14.5%	OTR TRACTOR	FL85A	Electric	9/12/2025
846	06051	14.5%	SEDAN	FL06	Common	9/15/2025
847	22013	14.5%	PICKUP	FL22	Electric	9/16/2025
848	23564	14.5%	VAN	FL23	Gas	9/16/2025
849	22105	14.5%	PICKUP	FL22	Common	9/17/2025
850	28078	14.5%	PICKUP	FL28	Electric	9/17/2025
851	30809	14.5%	PICKUP	FL22	Gas	9/17/2025

	A	B	C	D	E	F
1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
852	67004	14.5%	ELECTRIC SERVICE TRUCK	FL67	Electric	9/17/2025
853	E43807	14.7%	AIR COMPRESSOR	FLE43	Gas	9/11/2025
854	E79834	14.8%	DIRECTIONAL DRILL	FLE79	Gas	9/3/2025
855	E73828	14.8%	WHEEL LOADER	FLE73	Gas	9/10/2025
856	20011	14.8%	PICKUP	FL22	Electric	8/7/2024
857	45019	14.9%	FLEET SERVICE TRUCK	FL45	Common	1/9/2025
858	32579	14.9%	PICKUP	FL22	Gas	4/7/2025
859	E26040	14.9%	COMPACT LOADER	FLE26	Electric	6/3/2025
860	E60360	14.9%	FORKLIFT	FLE60	Gas	9/2/2025
861	E82829	14.9%	FLEX TRACK	FLE82	Electric	9/2/2025
862	28530	14.9%	PICKUP	FL28	Gas	9/4/2025
863	E36920	14.9%	EXCAVATOR	FLE36	Common	9/4/2025
864	86053	14.9%	FLATBED/STAKE RACK	FL86A	Gas	9/5/2025
865	E80057	14.9%	FLEX TRACK	FLE78	Electric	9/9/2025
866	85104	14.9%	OTR TRACTOR	FL85A	Electric	9/12/2025
867	59013	14.9%	FLATBED/STAKE RACK	FL59	Gas	9/15/2025
868	E42826	14.9%	EXCAVATOR	FLE36	Gas	9/16/2025
869	E20081	14.9%	BACKHOE	FLE20	Gas	9/17/2025
870	77069	14.9%	DIGGER DERRICK	FL77	Electric	4/12/2024
871	22646	15.1%	PICKUP	FL22	Electric	10/22/2024
872	E26044	15.2%	COMPACT LOADER	FLE26	Gas	9/11/2025
873	20203	15.3%	PICKUP	FL22	Electric	8/20/2025
874	59070	15.3%	FLATBED/STAKE RACK	FL59	Gas	9/2/2025
875	07051	15.3%	SUV	FL07	Electric	9/4/2025
876	E20198	15.3%	BACKHOE	FLE20	Electric	9/11/2025
877	E81000	15.3%	FLEX TRACK	FLE82	Electric	9/11/2025
878	45089	15.3%	FLEET SERVICE TRUCK	FL45	Common	9/12/2025
879	E10123	15.3%	TRENCHER	FLE11A	Gas	9/12/2025
880	E35886	15.3%	EXCAVATOR	FLE36	Electric	9/16/2025
881	E36014	15.3%	EXCAVATOR	FLE36	Common	9/16/2025
882	06079	15.3%	SEDAN	FL06	Common	9/17/2025
883	23022	15.3%	VAN	FL23	Common	9/17/2025
884	06072	15.6%	SEDAN	FL06	Common	7/15/2025
885	E81878	15.6%	FLEX TRACK	FLE78	Electric	8/8/2025
886	39015	15.6%	CARGO VAN	FL39	Electric	9/8/2025
887	E90057	15.6%	PERSONNEL CARRIER	FLE90	Electric	9/11/2025
888	54868	15.6%	DUMP TRUCK	FL54	Gas	9/12/2025
889	E36797	15.6%	EXCAVATOR	FLE36	Electric	9/12/2025
890	27052	15.6%	PICKUP	FL27B	Gas	9/15/2025
891	E82869	15.6%	FLEX TRACK	FLE82	Electric	9/15/2025
892	E77001	15.6%	FLEX TRACK	FLE78	Electric	9/16/2025
893	28938	15.6%	PICKUP	FL28	Electric	9/17/2025
894	37029	15.6%	SERVICE TRUCK	FL37	Gas	9/17/2025
895	38892	15.6%	PICKUP	FL28	Gas	9/17/2025
896	E10208	15.6%	TRENCHER	FLE11B	Electric	9/17/2025
897	E20005	15.6%	BACKHOE	FLE20	Gas	9/17/2025
898	E90051	15.6%	PERSONNEL CARRIER	FLE90	Gas	9/17/2025
899	83168	15.7%	FLATBED/STAKE RACK	FL83	Gas	8/28/2025
900	E90033	15.7%	PERSONNEL CARRIER	FLE90	Gas	9/4/2025
901	86034	15.7%	FLATBED/STAKE RACK	FL86A	Gas	9/9/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
902	E25024	15.7%	TOOL CARRIER	FLE25	Gas	9/16/2025
903	E20144	15.7%	BACKHOE	FLE20	Gas	9/17/2025
904	E80893	16.0%	FLEX TRACK	FLE78	Electric	8/21/2025
905	23657	16.0%	VAN	FL23	Gas	8/26/2025
906	38522	16.0%	PICKUP	FL28	Common	9/8/2025
907	E20204	16.0%	BACKHOE	FLE20	Gas	9/9/2025
908	28130	16.0%	PICKUP	FL28	Common	9/12/2025
909	39025	16.0%	CARGO VAN	FL39	Electric	9/15/2025
910	41050	16.0%	PICKUP	FL41	Gas	9/17/2025
911	86014	16.0%	FLATBED/STAKE RACK	FL86A	Electric	9/17/2025
912	28921	16.1%	PICKUP	FL28	Electric	9/17/2025
913	E20073	16.2%	BACKHOE	FLE20	Gas	9/11/2025
914	E20173	16.2%	BACKHOE	FLE20	Gas	9/17/2025
915	E11025	16.4%	TRENCHER	FLE11B	Electric	5/29/2025
916	54045	16.4%	DUMP TRUCK	FL54	Gas	8/4/2025
917	E11015	16.4%	TRENCHER	FLE11B	Electric	8/12/2025
918	28443	16.4%	PICKUP	FL28	Electric	8/27/2025
919	06136	16.4%	SEDAN	FL06	Common	8/28/2025
920	26060	16.4%	PICKUP	FL26	Gas	9/5/2025
921	E36024	16.4%	EXCAVATOR	FLE36	Gas	9/5/2025
922	77096	16.4%	DIGGER DERRICK	FL77	Electric	9/9/2025
923	E80807	16.4%	FLEX TRACK	FLE78	Electric	9/10/2025
924	07043	16.4%	SUV	FL07	Electric	9/16/2025
925	57092	16.4%	CRANE	FL57	Gas	9/16/2025
926	E80067	16.4%	FLEX TRACK	FLE78	Electric	9/16/2025
927	77002	16.4%	DIGGER DERRICK	FL77	Electric	9/17/2025
928	E10168	16.7%	TRENCHER	FLE11B	Gas	7/14/2025
929	E10104	16.7%	TRENCHER	FLE11A	Gas	9/16/2025
930	E36926	16.7%	EXCAVATOR	FLE36	Gas	9/17/2025
931	28818	16.8%	PICKUP	FL28	Gas	3/18/2025
932	89014	16.8%	BUCKET TRUCK	FL89	Electric	5/8/2025
933	E36173	16.8%	EXCAVATOR	FLE36	Gas	9/4/2025
934	22291	16.8%	PICKUP	FL22	Electric	9/8/2025
935	28411	16.8%	PICKUP	FL28	Common	9/10/2025
936	98014	16.8%	CRANE	FL98	Gas	9/12/2025
937	22551	16.8%	PICKUP	FL22	Electric	9/15/2025
938	07091	16.8%	SUV	FL07	Electric	9/17/2025
939	22068	16.8%	PICKUP	FL22	Gas	9/17/2025
940	28878	16.8%	PICKUP	FL28	Electric	9/17/2025
941	28928	16.8%	PICKUP	FL28	Electric	9/17/2025
942	64054	16.8%	SERVICE BUCKET TRUCK	FL64	Electric	9/17/2025
943	25428	16.9%	VAN	FL23	Common	3/25/2024
944	22496	17.1%	PICKUP	FL22	Gas	8/19/2024
945	E79041	17.1%	DIRECTIONAL DRILL	FLE79	Gas	9/10/2025
946	83248	17.1%	FLATBED/STAKE RACK	FL83	Gas	9/17/2025
947	86019	17.1%	FLATBED/STAKE RACK	FL86A	Gas	9/17/2025
948	E36293	17.2%	EXCAVATOR	FLE36	Gas	11/20/2024
949	85072	17.2%	OTR TRACTOR	FL85A	Gas	9/10/2025
950	65031	17.2%	STREETLIGHT TRUCK	FL65	Electric	9/12/2025
951	E36784	17.2%	EXCAVATOR	FLE36	Gas	9/17/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
952	E36938	17.6%	EXCAVATOR	FLE36	Electric	9/10/2025
953	22010	17.6%	PICKUP	FL22	Electric	9/11/2025
954	90123	17.6%	SERVICE TRUCK	FL90	Electric	9/12/2025
955	36135	17.6%	PICKUP	FL36	Electric	9/16/2025
956	E11165	17.6%	TRENCHER	FLE11B	Electric	9/16/2025
957	22132	17.6%	PICKUP	FL22	Gas	9/17/2025
958	26100	17.6%	PICKUP	FL26	Gas	9/17/2025
959	27259	17.6%	PICKUP	FL27B	Gas	9/17/2025
960	E20003	17.6%	BACKHOE	FLE20	Gas	9/2/2025
961	07290	17.6%	SUV	FL07	Gas	9/17/2025
962	44058	17.9%	GAS SERVICE TRUCK	FL44	Gas	10/2/2024
963	23563	17.9%	VAN	FL23	Gas	4/23/2025
964	E11484	17.9%	TRENCHER	FLE11A	Electric	8/27/2025
965	85114	17.9%	OTR TRACTOR	FL85A	Electric	9/5/2025
966	E80087	17.9%	FLEX TRACK	FLE78	Electric	9/5/2025
967	28935	17.9%	PICKUP	FL28	Electric	9/8/2025
968	28022	17.9%	PICKUP	FL28	Common	9/10/2025
969	39060	17.9%	CARGO VAN	FL39	Electric	9/11/2025
970	06034	17.9%	SEDAN	FL06	Common	9/12/2025
971	36040	17.9%	PICKUP	FL36	Gas	9/12/2025
972	E80004	17.9%	FLEX TRACK	FLE78	Electric	9/12/2025
973	22030	17.9%	PICKUP	FL22	Electric	9/15/2025
974	E36057	17.9%	EXCAVATOR	FLE36	Electric	9/15/2025
975	45808	17.9%	FLEET SERVICE TRUCK	FL45	Common	9/16/2025
976	E90011	17.9%	PERSONNEL CARRIER	FLE90	Electric	9/16/2025
977	22242	17.9%	PICKUP	FL22	Gas	9/17/2025
978	44245	17.9%	GAS SERVICE TRUCK	FL44	Gas	9/17/2025
979	90134	17.9%	SERVICE TRUCK	FL90	Electric	9/17/2025
980	E20022	17.9%	BACKHOE	FLE20	Gas	9/17/2025
981	E20561	18.1%	BACKHOE	FLE20	Gas	9/10/2025
982	E10098	18.1%	TRENCHER	FLE11B	Gas	9/11/2025
983	85007	18.3%	OTR TRACTOR	FL85A	Common	7/22/2024
984	64027	18.3%	SERVICE BUCKET TRUCK	FL64	Electric	9/5/2025
985	E80037	18.3%	FLEX TRACK	FLE78	Electric	9/5/2025
986	E36223	18.3%	EXCAVATOR	FLE36	Gas	9/11/2025
987	23594	18.3%	VAN	FL23	Gas	9/12/2025
988	28541	18.3%	PICKUP	FL28	Common	9/15/2025
989	E67000	18.3%	CRANE	FLE67	Electric	9/15/2025
990	23190	18.3%	VAN	FL23	Common	9/16/2025
991	E80077	18.3%	FLEX TRACK	FLE78	Electric	9/16/2025
992	06149	18.3%	SEDAN	FL06	Common	9/17/2025
993	23407	18.3%	VAN	FL23	Gas	9/17/2025
994	28073	18.3%	PICKUP	FL28	Gas	9/17/2025
995	86114	18.3%	FLATBED/STAKE RACK	FL86A	Electric	9/17/2025
996	E81837	18.3%	FLEX TRACK	FLE78	Electric	9/17/2025
997	E36664	18.4%	EXCAVATOR	FLE36	Gas	7/24/2024
998	83198	18.6%	FLATBED/STAKE RACK	FL83	Gas	9/17/2025
999	E10068	18.6%	TRENCHER	FLE11B	Gas	9/17/2025
1000	22712	18.7%	PICKUP	FL22	Gas	5/22/2025
1001	22202	18.7%	PICKUP	FL22	Electric	8/11/2025

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1002	28481	18.7%	PICKUP	FL28	Electric	8/25/2025
1003	22272	18.7%	PICKUP	FL22	Electric	8/26/2025
1004	E77850	18.7%	FLEX TRACK	FLE82	Electric	9/5/2025
1005	28965	18.7%	PICKUP	FL28	Common	9/11/2025
1006	44068	18.7%	GAS SERVICE TRUCK	FL44	Gas	9/11/2025
1007	59009	18.7%	FLATBED/STAKE RACK	FL59	Gas	9/16/2025
1008	28208	18.7%	PICKUP	FL28	Electric	9/17/2025
1009	59010	18.7%	FLATBED/STAKE RACK	FL59	Gas	9/17/2025
1010	89653	18.7%	BUCKET TRUCK	FL89	Electric	9/17/2025
1011	E11581	18.7%	TRENCHER	FLE11A	Electric	9/17/2025
1012	E79005	18.7%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
1013	23602	18.8%	VAN	FL23	Electric	8/4/2025
1014	E10178	19.0%	TRENCHER	FLE11B	Gas	8/12/2025
1015	90243	19.0%	SERVICE TRUCK	FL90	Gas	9/17/2025
1016	77823	19.1%	DIGGER DERRICK	FL77	Electric	5/31/2024
1017	06193	19.1%	SEDAN	FL06	Gas	9/18/2024
1018	06156	19.1%	SEDAN	FL06	Common	8/11/2025
1019	06014	19.1%	SEDAN	FL06	Gas	8/27/2025
1020	E81729	19.1%	FLEX TRACK	FLE78	Electric	9/10/2025
1021	38362	19.1%	PICKUP	FL28	Electric	9/15/2025
1022	E11024	19.1%	TRENCHER	FLE11B	Electric	9/16/2025
1023	E36025	19.1%	EXCAVATOR	FLE36	Electric	9/16/2025
1024	85044	19.1%	OTR TRACTOR	FL85A	Electric	9/17/2025
1025	E36654	19.1%	EXCAVATOR	FLE36	Gas	9/17/2025
1026	44226	19.2%	GAS SERVICE TRUCK	FL44	Gas	10/31/2024
1027	25070	19.2%	VAN	FL23	Electric	6/19/2024
1028	06269	19.5%	SEDAN	FL06	Common	8/6/2025
1029	27040	19.5%	PICKUP	FL27B	Gas	8/21/2025
1030	83005	19.5%	FLATBED/STAKE RACK	FL83	Common	9/3/2025
1031	39070	19.5%	CARGO VAN	FL39	Electric	9/15/2025
1032	E20194	19.5%	BACKHOE	FLE20	Electric	9/16/2025
1033	07081	19.5%	SUV	FL07	Gas	9/17/2025
1034	E20643	19.5%	BACKHOE	FLE20	Gas	9/17/2025
1035	E25023	19.5%	TOOL CARRIER	FLE25	Gas	4/12/2024
1036	E10154	19.5%	TRENCHER	FLE11A	Gas	8/22/2025
1037	E36815	19.5%	EXCAVATOR	FLE36	Gas	9/17/2025
1038	E73013	19.5%	WHEEL LOADER	FLE73	Gas	9/17/2025
1039	28136	19.6%	PICKUP	FL28	Electric	7/24/2024
1040	06252	19.8%	SEDAN	FL06	Electric	8/22/2025
1041	22141	19.8%	PICKUP	FL22	Electric	8/26/2025
1042	28391	19.8%	PICKUP	FL28	Common	9/10/2025
1043	E22892	19.8%	COMPACT LOADER	FLE26	Gas	9/12/2025
1044	E81848	19.8%	FLEX TRACK	FLE78	Electric	9/12/2025
1045	22303	19.8%	PICKUP	FL22	Electric	9/17/2025
1046	38751	19.8%	PICKUP	FL28	Common	9/17/2025
1047	E36373	19.8%	EXCAVATOR	FLE36	Gas	9/17/2025
1048	E82841	19.8%	FLEX TRACK	FLE82	Electric	9/17/2025
1049	E90008	19.8%	PERSONNEL CARRIER	FLE90	Gas	9/17/2025
1050	06043	19.9%	SEDAN	FL06	Gas	8/7/2024
1051	86087	20.0%	FLATBED/STAKE RACK	FL86A	Gas	9/16/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
1052	90044	20.0%	SERVICE TRUCK	FL90	Gas	9/17/2025
1053	E30021	20.2%	DOZER	FLE30	Gas	9/17/2025
1054	E73584	20.2%	EXCAVATOR	FLE36	Gas	8/22/2025
1055	E90000	20.2%	PERSONNEL CARRIER	FLE90	Electric	8/25/2025
1056	64013	20.2%	SERVICE BUCKET TRUCK	FL64	Electric	9/5/2025
1057	57062	20.2%	CRANE	FL57	Gas	9/10/2025
1058	57020	20.2%	CRANE	FL57	Electric	9/11/2025
1059	22130	20.2%	PICKUP	FL22	Electric	9/16/2025
1060	E11223	20.2%	TRENCHER	FLE11B	Electric	9/16/2025
1061	23794	20.2%	VAN	FL23	Gas	9/17/2025
1062	28042	20.2%	PICKUP	FL28	Electric	9/17/2025
1063	38642	20.2%	PICKUP	FL28	Electric	9/17/2025
1064	28548	20.4%	PICKUP	FL28	Gas	7/19/2024
1065	23764	20.4%	VAN	FL23	Gas	10/24/2024
1066	55822	20.5%	DUMP TRUCK	FL55	Electric	9/17/2025
1067	E10895	20.5%	TRENCHER	FLE11A	Gas	5/28/2025
1068	E79044	20.5%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
1069	22251	20.5%	PICKUP	FL22	Common	10/8/2024
1070	67000	20.6%	ELECTRIC SERVICE TRUCK	FL67	Electric	9/4/2025
1071	85154	20.6%	OTR TRACTOR	FL85A	Common	9/9/2025
1072	E79084	20.6%	DIRECTIONAL DRILL	FLE79	Gas	9/9/2025
1073	54072	20.6%	DUMP TRUCK	FL54	Electric	9/12/2025
1074	E36197	20.6%	EXCAVATOR	FLE36	Gas	9/15/2025
1075	28140	20.6%	PICKUP	FL28	Electric	9/17/2025
1076	28289	20.6%	PICKUP	FL28	Common	9/17/2025
1077	E11071	20.6%	TRENCHER	FLE11B	Electric	9/17/2025
1078	E22811	20.6%	COMPACT LOADER	FLE26	Gas	9/17/2025
1079	E36247	20.6%	EXCAVATOR	FLE36	Electric	9/17/2025
1080	E73818	20.6%	WHEEL LOADER	FLE73	Gas	9/17/2025
1081	E82839	20.6%	FLEX TRACK	FLE82	Electric	9/17/2025
1082	64151	20.7%	SERVICE BUCKET TRUCK	FL64	Electric	2/22/2024
1083	28458	20.8%	PICKUP	FL28	Gas	6/12/2024
1084	28204	20.8%	PICKUP	FL28	Gas	6/26/2024
1085	83098	21.0%	FLATBED/STAKE RACK	FL83	Gas	9/15/2025
1086	86097	21.0%	FLATBED/STAKE RACK	FL86A	Gas	9/15/2025
1087	E10134	21.0%	TRENCHER	FLE11A	Gas	9/17/2025
1088	06141	21.0%	SEDAN	FL06	Electric	10/10/2024
1089	44209	21.0%	GAS SERVICE TRUCK	FL44	Gas	7/16/2025
1090	06055	21.0%	SEDAN	FL06	Gas	8/26/2025
1091	E20093	21.0%	BACKHOE	FLE20	Gas	9/5/2025
1092	44138	21.0%	GAS SERVICE TRUCK	FL44	Gas	9/9/2025
1093	77292	21.0%	DIGGER DERRICK	FL77	Electric	9/9/2025
1094	38422	21.0%	PICKUP	FL28	Electric	9/17/2025
1095	E26006	21.0%	COMPACT LOADER	FLE26	Electric	9/17/2025
1096	E73827	21.0%	WHEEL LOADER	FLE73	Gas	9/15/2025
1097	99888	21.3%	CUBE VAN	FL84	Gas	10/15/2024
1098	22311	21.4%	PICKUP	FL22	Electric	1/22/2025
1099	37895	21.4%	SERVICE TRUCK	FL37	Electric	8/5/2025
1100	E22808	21.4%	COMPACT LOADER	FLE26	Gas	8/12/2025
1101	28743	21.4%	PICKUP	FL28	Common	9/3/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
1102	07168	21.4%	SUV	FL07	Electric	9/10/2025
1103	22220	21.4%	PICKUP	FL22	Electric	9/15/2025
1104	06339	21.4%	SEDAN	FL06	Electric	9/17/2025
1105	22213	21.4%	PICKUP	FL22	Electric	9/17/2025
1106	23592	21.4%	VAN	FL23	Common	9/17/2025
1107	38672	21.4%	PICKUP	FL28	Electric	9/17/2025
1108	54017	21.4%	DUMP TRUCK	FL54	Gas	9/17/2025
1109	86084	21.4%	FLATBED/STAKE RACK	FL86A	Gas	9/9/2025
1110	86038	21.4%	FLATBED/STAKE RACK	FL86B	Gas	9/17/2025
1111	90184	21.4%	SERVICE TRUCK	FL90	Gas	9/17/2025
1112	23174	21.6%	VAN	FL23	Gas	3/4/2024
1113	E79854	21.8%	DIRECTIONAL DRILL	FLE79	Electric	1/27/2025
1114	23649	21.8%	VAN	FL23	Gas	9/8/2025
1115	99018	21.8%	SERVICE TRUCK	FL90	Gas	9/12/2025
1116	28528	21.8%	PICKUP	FL28	Common	9/16/2025
1117	57007	21.8%	CRANE	FL57	Electric	9/16/2025
1118	22381	21.8%	PICKUP	FL22	Gas	9/17/2025
1119	27279	21.8%	PICKUP	FL27B	Gas	9/17/2025
1120	55898	21.8%	DUMP TRUCK	FL55	Electric	9/17/2025
1121	90059	21.8%	SERVICE TRUCK	FL90	Electric	9/17/2025
1122	E20793	21.9%	BACKHOE	FLE20	Gas	9/8/2025
1123	59044	21.9%	FLATBED/STAKE RACK	FL59	Gas	9/10/2025
1124	E20404	21.9%	BACKHOE	FLE20	Gas	9/12/2025
1125	E79937	21.9%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
1126	22321	22.1%	PICKUP	FL22	Common	6/18/2025
1127	28010	22.1%	PICKUP	FL28	Common	9/8/2025
1128	38165	22.1%	PICKUP	FL28	Common	9/15/2025
1129	22561	22.1%	PICKUP	FL22	Electric	9/16/2025
1130	54058	22.1%	DUMP TRUCK	FL54	Gas	9/16/2025
1131	E36978	22.1%	EXCAVATOR	FLE36	Gas	9/16/2025
1132	E82000	22.1%	FLEX TRACK	FLE82	Electric	9/16/2025
1133	22205	22.1%	PICKUP	FL22	Electric	9/17/2025
1134	23383	22.1%	VAN	FL23	Gas	9/17/2025
1135	26657	22.1%	PICKUP	FL26	Gas	9/17/2025
1136	E36044	22.1%	EXCAVATOR	FLE36	Gas	9/17/2025
1137	29907	22.4%	PICKUP	FL28	Gas	9/17/2025
1138	86144	22.4%	FLATBED/STAKE RACK	FL86A	Gas	9/17/2025
1139	90223	22.4%	SERVICE TRUCK	FL90	Gas	9/17/2025
1140	28213	22.5%	PICKUP	FL28	Electric	5/13/2024
1141	12249	22.5%	SUV	FL07	Gas	3/31/2025
1142	06078	22.5%	SEDAN	FL06	Common	5/5/2025
1143	77105	22.5%	DIGGER DERRICK	FL77	Electric	5/14/2025
1144	06338	22.5%	SEDAN	FL06	Common	8/4/2025
1145	E81835	22.5%	FLEX TRACK	FLE78	Electric	9/5/2025
1146	38185	22.5%	PICKUP	FL28	Electric	9/9/2025
1147	38741	22.5%	PICKUP	FL28	Common	9/10/2025
1148	28110	22.5%	PICKUP	FL28	Common	9/15/2025
1149	57072	22.5%	CRANE	FL57	Gas	9/16/2025
1150	E11002	22.5%	TRENCHER	FLE11B	Electric	9/16/2025
1151	E78990	22.5%	FLEX TRACK	FLE78	Electric	9/16/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
1152	60006	22.5%	ELECTRIC SERVICE TRUCK	FL60	Electric	9/17/2025
1153	85084	22.5%	OTR TRACTOR	FL85A	Electric	9/17/2025
1154	E36074	22.5%	EXCAVATOR	FLE36	Gas	9/17/2025
1155	E90026	22.5%	PERSONNEL CARRIER	FLE90	Common	9/17/2025
1156	64215	22.7%	SERVICE BUCKET TRUCK	FL64	Electric	1/24/2024
1157	E36972	22.7%	MINI EXCAVATOR	FLE36	Gas	5/9/2025
1158	77835	22.7%	DIGGER DERRICK	FL77	Electric	9/17/2025
1159	43812	22.9%	DUMP TRUCK	FL43	Electric	8/30/2024
1160	E36377	22.9%	EXCAVATOR	FLE36	Gas	9/8/2025
1161	90203	22.9%	SERVICE TRUCK	FL90	Gas	9/17/2025
1162	E20153	22.9%	BACKHOE	FLE20	Gas	9/17/2025
1163	12319	22.9%	SUV	FL07	Electric	12/18/2024
1164	06202	22.9%	SEDAN	FL06	Common	5/2/2025
1165	22642	22.9%	PICKUP	FL22	Common	8/4/2025
1166	E22001	22.9%	UTILITY TRACTOR	FLE23	Electric	8/26/2025
1167	E82889	22.9%	FLEX TRACK	FLE82	Electric	9/5/2025
1168	E36817	22.9%	EXCAVATOR	FLE36	Gas	9/8/2025
1169	02003	22.9%	SEDAN	FL06	Common	9/10/2025
1170	23669	22.9%	VAN	FL23	Common	9/11/2025
1171	E36656	22.9%	EXCAVATOR	FLE36	Electric	9/15/2025
1172	64222	22.9%	SERVICE BUCKET TRUCK	FL64	Electric	9/17/2025
1173	83822	22.9%	FLATBED/STAKE RACK	FL83	Electric	9/17/2025
1174	E15858	22.9%	TRENCHER	FLE11C	Electric	9/17/2025
1175	E25094	23.1%	TOOL CARRIER	FLE25	Gas	3/5/2024
1176	23974	23.3%	VAN	FL23	Gas	9/17/2025
1177	32259	23.3%	PICKUP	FL22	Common	9/17/2025
1178	44129	23.3%	GAS SERVICE TRUCK	FL44	Gas	6/24/2025
1179	E36217	23.3%	EXCAVATOR	FLE36	Electric	9/8/2025
1180	E95020	23.3%	PLATFORM LIFT	FLE95A	Electric	9/11/2025
1181	07058	23.3%	SUV	FL07	Electric	9/16/2025
1182	32479	23.3%	PICKUP	FL22	Gas	9/16/2025
1183	86117	23.3%	FLATBED/STAKE RACK	FL86A	Electric	9/16/2025
1184	06155	23.3%	SEDAN	FL06	Gas	9/17/2025
1185	06199	23.3%	SEDAN	FL06	Common	9/17/2025
1186	22095	23.3%	PICKUP	FL22	Common	9/17/2025
1187	E36157	23.3%	EXCAVATOR	FLE36	Gas	9/17/2025
1188	12449	23.3%	SUV	FL07	Gas	9/17/2024
1189	E20232	23.3%	BACKHOE	FLE20	Gas	8/26/2025
1190	54053	23.3%	DUMP TRUCK	FL54	Gas	9/4/2025
1191	E79011	23.3%	DIRECTIONAL DRILL	FLE79	Gas	9/15/2025
1192	E20444	23.3%	BACKHOE	FLE20	Gas	9/16/2025
1193	68134	23.3%	VAN	FL68	Gas	9/17/2025
1194	22069	23.7%	PICKUP	FL22	Electric	1/24/2025
1195	E80878	23.7%	FLEX TRACK	FLE78	Electric	8/22/2025
1196	27220	23.7%	PICKUP	FL27B	Gas	8/26/2025
1197	E79858	23.7%	DIRECTIONAL DRILL	FLE79	Gas	8/29/2025
1198	07098	23.7%	SUV	FL07	Electric	9/9/2025
1199	22331	23.7%	PICKUP	FL22	Electric	9/11/2025
1200	23150	23.7%	VAN	FL23	Gas	9/12/2025
1201	27037	23.7%	PICKUP	FL27A	Gas	9/12/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
1202	28150	23.7%	PICKUP	FL28	Common	9/15/2025
1203	E36007	23.7%	EXCAVATOR	FLE36	Electric	9/15/2025
1204	E36107	23.7%	EXCAVATOR	FLE36	Electric	9/15/2025
1205	07103	23.7%	SUV	FL07	Electric	9/16/2025
1206	45828	23.7%	FLEET SERVICE TRUCK	FL45	Common	9/16/2025
1207	23784	23.7%	VAN	FL23	Gas	9/17/2025
1208	36033	23.7%	PICKUP	FL36	Electric	9/17/2025
1209	54027	23.7%	DUMP TRUCK	FL54	Gas	9/17/2025
1210	90118	23.7%	SERVICE TRUCK	FL90	Electric	9/17/2025
1211	E90071	23.7%	PERSONNEL CARRIER	FLE90	Gas	9/17/2025
1212	06015	23.7%	SEDAN	FL06	Gas	9/16/2025
1213	E20004	23.8%	BACKHOE	FLE20	Gas	9/15/2025
1214	12129	23.8%	SUV	FL07	Gas	3/11/2024
1215	90024	24.0%	SERVICE TRUCK	FL90	Gas	6/6/2025
1216	E30845	24.0%	EXCAVATOR	FLE73	Gas	8/7/2025
1217	23183	24.0%	VAN	FL23	Gas	9/3/2025
1218	43006	24.0%	DUMP TRUCK	FL43	Electric	9/4/2025
1219	28707	24.0%	PICKUP	FL28	Electric	9/9/2025
1220	28160	24.0%	PICKUP	FL28	Common	9/10/2025
1221	06077	24.0%	SEDAN	FL06	Common	9/11/2025
1222	06123	24.0%	SEDAN	FL06	Common	9/12/2025
1223	06179	24.0%	SEDAN	FL06	Gas	9/17/2025
1224	07138	24.0%	SUV	FL07	Gas	9/17/2025
1225	22280	24.0%	PICKUP	FL22	Common	9/17/2025
1226	22305	24.0%	PICKUP	FL22	Gas	9/17/2025
1227	28141	24.0%	PICKUP	FL28	Common	9/17/2025
1228	28508	24.0%	PICKUP	FL28	Common	9/17/2025
1229	E90028	24.0%	PERSONNEL CARRIER	FLE90	Gas	9/17/2025
1230	E11033	24.1%	TRENCHER	FLE11B	Electric	4/24/2024
1231	22454	24.2%	PICKUP	FL22	Common	8/12/2025
1232	22084	24.2%	PICKUP	FL22	Electric	9/10/2025
1233	E10188	24.3%	TRENCHER	FLE11B	Gas	7/21/2025
1234	E10144	24.3%	TRENCHER	FLE11A	Gas	8/22/2025
1235	E10224	24.3%	TRENCHER	FLE11A	Gas	9/16/2025
1236	E10038	24.3%	TRENCHER	FLE11B	Gas	9/17/2025
1237	27109	24.4%	PICKUP	FL27A	Gas	8/15/2025
1238	23060	24.4%	VAN	FL23	Common	8/26/2025
1239	37049	24.4%	SERVICE TRUCK	FL37	Electric	9/12/2025
1240	44055	24.4%	GAS SERVICE TRUCK	FL44	Gas	9/12/2025
1241	E11012	24.4%	TRENCHER	FLE11B	Electric	9/15/2025
1242	28469	24.4%	PICKUP	FL28	Common	9/16/2025
1243	22021	24.4%	PICKUP	FL22	Common	9/17/2025
1244	28341	24.4%	PICKUP	FL28	Common	9/17/2025
1245	59102	24.4%	FLATBED/STAKE RACK	FL59	Gas	9/17/2025
1246	86054	24.4%	FLATBED/STAKE RACK	FL86A	Electric	9/17/2025
1247	22412	24.5%	PICKUP	FL22	Electric	8/16/2024
1248	39810	24.5%	CARGO VAN	FL39	Gas	5/3/2024
1249	28742	24.6%	PICKUP	FL28	Common	3/6/2024
1250	E36091	24.8%	EXCAVATOR	FLE36	Gas	9/5/2025
1251	E36224	24.8%	EXCAVATOR	FLE36	Gas	9/9/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
1252	E60098	24.8%	FORKLIFT	FLE60	Gas	9/11/2025
1253	86157	24.8%	FLATBED/STAKE RACK	FL86A	Gas	9/12/2025
1254	E30004	24.8%	DOZER	FLE30	Gas	9/15/2025
1255	38372	24.8%	PICKUP	FL28	Electric	3/17/2025
1256	28069	24.8%	PICKUP	FL28	Common	9/5/2025
1257	E80899	24.8%	FLEX TRACK	FLE78	Electric	9/8/2025
1258	23006	24.8%	VAN	FL23	Common	9/10/2025
1259	90163	24.8%	SERVICE TRUCK	FL90	Electric	9/15/2025
1260	06076	24.8%	SEDAN	FL06	Common	9/16/2025
1261	12419	24.8%	SUV	FL07	Common	9/16/2025
1262	28335	25.0%	PICKUP	FL28	Electric	1/25/2024
1263	37028	25.0%	SERVICE TRUCK	FL37	Common	2/14/2025
1264	23227	25.0%	VAN	FL23	Gas	9/2/2025
1265	E81868	25.2%	FLEX TRACK	FLE82	Electric	9/10/2025
1266	45029	25.2%	FLEET SERVICE TRUCK	FL45	Common	9/12/2025
1267	E20054	25.2%	BACKHOE	FLE20	Electric	9/12/2025
1268	22652	25.2%	PICKUP	FL22	Electric	9/15/2025
1269	28735	25.2%	PICKUP	FL28	Electric	9/15/2025
1270	07093	25.2%	SUV	FL07	Electric	9/16/2025
1271	07310	25.2%	SUV	FL07	Gas	9/16/2025
1272	22201	25.2%	PICKUP	FL22	Electric	9/16/2025
1273	22301	25.2%	PICKUP	FL22	Electric	9/16/2025
1274	07036	25.2%	SUV	FL07	Gas	9/17/2025
1275	75011	25.2%	DIGGER DERRICK	FL75	Electric	9/17/2025
1276	90113	25.2%	SERVICE TRUCK	FL90	Electric	9/17/2025
1277	99011	25.2%	CUBE VAN	FL84	Common	9/17/2025
1278	86127	25.2%	FLATBED/STAKE RACK	FL86A	Gas	12/18/2024
1279	E25084	25.2%	TOOL CARRIER	FLE25	Gas	7/29/2025
1280	E79955	25.2%	DIRECTIONAL DRILL	FLE79	Gas	8/15/2025
1281	E20553	25.2%	BACKHOE	FLE20	Gas	8/26/2025
1282	E20784	25.2%	BACKHOE	FLE20	Gas	9/16/2025
1283	20072	25.3%	PICKUP	FL22	Gas	4/2/2024
1284	E90136	25.6%	PERSONNEL CARRIER	FLE90	Gas	8/21/2025
1285	E20870	25.6%	BACKHOE	FLE20	Gas	9/2/2025
1286	54972	25.6%	DUMP TRUCK	FL54	Gas	9/10/2025
1287	28241	25.6%	PICKUP	FL28	Electric	9/11/2025
1288	E11120	25.6%	TRENCHER	FLE11B	Electric	9/12/2025
1289	E36177	25.6%	EXCAVATOR	FLE36	Gas	9/15/2025
1290	54858	25.6%	DUMP TRUCK	FL54	Gas	9/16/2025
1291	E11105	25.6%	TRENCHER	FLE11B	Electric	9/16/2025
1292	22165	25.6%	PICKUP	FL22	Common	9/17/2025
1293	22181	25.6%	PICKUP	FL22	Electric	9/17/2025
1294	28577	25.6%	PICKUP	FL28	Electric	9/17/2025
1295	28851	25.6%	PICKUP	FL28	Electric	9/17/2025
1296	54035	25.6%	DUMP TRUCK	FL54	Gas	9/17/2025
1297	E20078	25.6%	BACKHOE	FLE20	Gas	9/17/2025
1298	22464	25.6%	PICKUP	FL22	Electric	9/17/2025
1299	23034	25.6%	VAN	FL23	Gas	9/17/2025
1300	43025	25.7%	DUMP TRUCK	FL43	Gas	9/17/2025
1301	59923	26.0%	FLATBED/STAKE RACK	FL59	Electric	9/11/2024

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
1302	E79865	26.0%	DIRECTIONAL DRILL	FLE79	Gas	8/29/2025
1303	E36828	26.0%	EXCAVATOR	FLE36	Gas	9/15/2025
1304	36220	26.0%	PICKUP	FL36	Electric	9/17/2025
1305	45069	26.0%	FLEET SERVICE TRUCK	FL45	Common	9/17/2025
1306	E79987	26.2%	DIRECTIONAL DRILL	FLE79	Gas	9/12/2025
1307	86048	26.2%	FLATBED/STAKE RACK	FL86B	Gas	9/17/2025
1308	E25104	26.2%	TOOL CARRIER	FLE25	Gas	9/17/2025
1309	E26874	26.2%	COMPACT LOADER	FLE26	Gas	9/17/2025
1310	E79074	26.2%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
1311	E36354	26.3%	EXCAVATOR	FLE36	Electric	9/9/2025
1312	27097	26.3%	PICKUP	FL27A	Gas	4/22/2024
1313	20212	26.3%	PICKUP	FL22	Gas	8/28/2024
1314	23623	26.3%	VAN	FL23	Gas	7/31/2025
1315	22446	26.3%	PICKUP	FL22	Gas	9/11/2025
1316	06249	26.3%	SEDAN	FL06	Common	9/16/2025
1317	28279	26.3%	PICKUP	FL28	Common	9/16/2025
1318	23343	26.3%	VAN	FL23	Gas	9/17/2025
1319	28605	26.3%	PICKUP	FL28	Common	9/17/2025
1320	57082	26.3%	CRANE	FL57	Gas	9/17/2025
1321	59049	26.3%	FLATBED/STAKE RACK	FL59	Gas	9/17/2025
1322	59166	26.3%	FLATBED/STAKE RACK	FL59	Gas	9/17/2025
1323	64208	26.3%	SERVICE BUCKET TRUCK	FL64	Electric	9/17/2025
1324	E73816	26.6%	WHEEL LOADER	FLE73	Gas	9/17/2025
1325	E36234	26.7%	EXCAVATOR	FLE36	Gas	7/22/2025
1326	E36085	26.7%	EXCAVATOR	FLE36	Gas	9/2/2025
1327	86078	26.7%	FLATBED/STAKE RACK	FL86B	Gas	9/12/2025
1328	E73835	26.7%	WHEEL LOADER	FLE73	Gas	9/16/2025
1329	54174	26.7%	DUMP TRUCK	FL54	Gas	9/17/2025
1330	E20222	26.7%	BACKHOE	FLE20	Gas	9/17/2025
1331	E30014	26.7%	DOZER	FLE30	Gas	9/17/2025
1332	06069	26.7%	SEDAN	FL06	Gas	5/5/2025
1333	E73834	26.7%	EXCAVATOR	FLE36	Electric	8/21/2025
1334	06035	26.7%	SEDAN	FL06	Common	9/11/2025
1335	30479	26.7%	PICKUP	FL22	Gas	9/11/2025
1336	22062	26.7%	PICKUP	FL22	Gas	9/15/2025
1337	45035	26.7%	FLEET SERVICE TRUCK	FL45	Common	9/16/2025
1338	E36385	26.7%	EXCAVATOR	FLE36	Electric	9/16/2025
1339	08100	26.7%	SUV	FL07	Electric	9/17/2025
1340	28250	26.7%	PICKUP	FL28	Electric	9/17/2025
1341	57004	26.7%	CRANE	FL57	Gas	9/17/2025
1342	E36464	26.9%	EXCAVATOR	FLE36	Electric	9/12/2025
1343	23929	26.9%	VAN	FL23	Gas	9/17/2025
1344	E79124	27.1%	DIRECTIONAL DRILL	FLE79	Gas	9/12/2025
1345	43021	27.1%	DUMP TRUCK	FL43	Electric	4/23/2025
1346	22182	27.1%	PICKUP	FL22	Electric	8/8/2025
1347	38532	27.1%	PICKUP	FL28	Common	8/28/2025
1348	22363	27.1%	PICKUP	FL22	Common	9/9/2025
1349	86004	27.1%	FLATBED/STAKE RACK	FL86A	Common	9/9/2025
1350	06229	27.1%	SEDAN	FL06	Common	9/10/2025
1351	22080	27.1%	PICKUP	FL22	Electric	9/11/2025

	A	B	C	D	E	F
1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
1352	77107	27.1%	DIGGER DERRICK	FL77	Electric	9/11/2025
1353	E89009	27.1%	FLEX TRACK	FLE78	Electric	9/11/2025
1354	06159	27.1%	SEDAN	FL06	Common	9/15/2025
1355	89277	27.1%	BUCKET TRUCK	FL89	Electric	9/15/2025
1356	08150	27.1%	SUV	FL07	Common	9/17/2025
1357	59119	27.1%	FLATBED/STAKE RACK	FL59	Gas	9/17/2025
1358	90164	27.1%	SERVICE TRUCK	FL90	Electric	9/17/2025
1359	54846	27.1%	DUMP TRUCK	FL54	Gas	9/16/2025
1360	E36244	27.1%	EXCAVATOR	FLE36	Gas	9/17/2025
1361	E79474	27.3%	DIRECTIONAL DRILL	FLE79	Gas	5/5/2025
1362	22034	27.3%	PICKUP	FL22	Common	9/17/2025
1363	27054	27.3%	PICKUP	FL27B	Gas	9/17/2025
1364	07046	27.5%	SUV	FL07	Common	8/4/2025
1365	36080	27.5%	PICKUP	FL36	Electric	8/13/2025
1366	42023	27.5%	PICKUP	FL42A	Gas	8/25/2025
1367	38111	27.5%	PICKUP	FL28	Common	9/5/2025
1368	E82819	27.5%	FLEX TRACK	FLE82	Electric	9/5/2025
1369	27320	27.5%	PICKUP	FL27B	Gas	9/12/2025
1370	07023	27.5%	SUV	FL07	Electric	9/15/2025
1371	77133	27.5%	DIGGER DERRICK	FL77	Electric	9/15/2025
1372	32589	27.5%	PICKUP	FL22	Electric	9/16/2025
1373	20053	27.5%	PICKUP	FL22	Electric	9/17/2025
1374	22245	27.5%	PICKUP	FL22	Electric	9/17/2025
1375	22572	27.5%	PICKUP	FL22	Electric	9/17/2025
1376	27090	27.5%	PICKUP	FL27B	Gas	9/17/2025
1377	28231	27.5%	PICKUP	FL28	Gas	9/17/2025
1378	38275	27.5%	PICKUP	FL28	Electric	9/17/2025
1379	54147	27.5%	DUMP TRUCK	FL54	Gas	9/17/2025
1380	59132	27.5%	FLATBED/STAKE RACK	FL59	Gas	9/17/2025
1381	E26028	27.5%	COMPACT LOADER	FLE26	Gas	9/17/2025
1382	E79927	27.6%	DIRECTIONAL DRILL	FLE79	Gas	9/12/2025
1383	E30806	27.7%	EXCAVATOR	FLE73	Gas	6/3/2024
1384	E79991	27.9%	DIRECTIONAL DRILL	FLE79	Gas	12/12/2024
1385	E80048	27.9%	FLEX TRACK	FLE78	Electric	4/15/2025
1386	06016	27.9%	SEDAN	FL06	Common	8/5/2025
1387	22658	27.9%	PICKUP	FL22	Gas	9/2/2025
1388	E11196	27.9%	TRENCHER	FLE11B	Electric	9/3/2025
1389	E36017	27.9%	EXCAVATOR	FLE36	Electric	9/4/2025
1390	28745	27.9%	PICKUP	FL28	Electric	9/8/2025
1391	E82849	27.9%	FLEX TRACK	FLE82	Electric	9/8/2025
1392	E36267	27.9%	EXCAVATOR	FLE36	Gas	9/10/2025
1393	E50838	27.9%	EXCAVATOR	FLE36	Electric	9/12/2025
1394	28487	27.9%	PICKUP	FL28	Electric	9/16/2025
1395	86003	27.9%	FLATBED/STAKE RACK	FL86A	Electric	9/17/2025
1396	86028	27.9%	FLATBED/STAKE RACK	FL86B	Gas	9/17/2025
1397	59034	28.1%	FLATBED/STAKE RACK	FL59	Gas	9/17/2025
1398	83218	28.1%	FLATBED/STAKE RACK	FL83	Gas	9/17/2025
1399	77159	28.2%	DIGGER DERRICK	FL77	Electric	6/30/2025
1400	07148	28.2%	SUV	FL07	Gas	8/26/2025
1401	E78009	28.2%	FLEX TRACK	FLE78	Electric	9/5/2025

	A	B	C	D	E	F
1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
1402	36122	28.2%	PICKUP	FL36	Electric	9/8/2025
1403	07218	28.2%	SUV	FL07	Common	9/9/2025
1404	06173	28.2%	SEDAN	FL06	Common	9/15/2025
1405	07228	28.2%	SUV	FL07	Common	9/17/2025
1406	22055	28.2%	PICKUP	FL22	Electric	9/17/2025
1407	64070	28.2%	SERVICE BUCKET TRUCK	FL64	Electric	9/17/2025
1408	89447	28.2%	BUCKET TRUCK	FL89	Electric	9/17/2025
1409	E23009	28.2%	UTILITY TRACTOR	FLE23	Common	9/17/2025
1410	E99021	28.2%	TOOL CARRIER	FLE25	Gas	9/17/2025
1411	54963	28.4%	DUMP TRUCK	FL54	Electric	9/12/2025
1412	E36254	28.6%	EXCAVATOR	FLE36	Gas	9/10/2025
1413	45838	28.6%	FLEET SERVICE TRUCK	FL45	Common	8/29/2024
1414	E36708	28.6%	EXCAVATOR	FLE36	Gas	9/12/2025
1415	22160	28.6%	PICKUP	FL22	Gas	9/16/2025
1416	22352	28.6%	PICKUP	FL22	Electric	9/16/2025
1417	23220	28.6%	VAN	FL23	Gas	9/17/2025
1418	23273	28.6%	VAN	FL23	Gas	9/17/2025
1419	28203	28.6%	PICKUP	FL28	Electric	9/17/2025
1420	86067	28.6%	FLATBED/STAKE RACK	FL86A	Electric	9/17/2025
1421	90011	28.6%	SERVICE TRUCK	FL90	Electric	9/17/2025
1422	E36253	28.6%	EXCAVATOR	FLE36	Electric	9/17/2025
1423	22196	28.8%	PICKUP	FL22	Gas	8/28/2024
1424	54859	28.9%	DUMP TRUCK	FL54	Gas	9/17/2025
1425	E79891	29.0%	DIRECTIONAL DRILL	FLE79	Electric	5/8/2025
1426	90074	29.0%	SERVICE TRUCK	FL90	Electric	6/16/2025
1427	06092	29.0%	SEDAN	FL06	Common	9/3/2025
1428	E36868	29.0%	EXCAVATOR	FLE36	Gas	9/5/2025
1429	06145	29.0%	SEDAN	FL06	Electric	9/15/2025
1430	28695	29.0%	PICKUP	FL28	Electric	9/15/2025
1431	22701	29.0%	PICKUP	FL22	Gas	9/16/2025
1432	06279	29.0%	SEDAN	FL06	Electric	9/17/2025
1433	23016	29.0%	VAN	FL23	Electric	9/17/2025
1434	E36785	29.0%	EXCAVATOR	FLE36	Electric	9/17/2025
1435	64046	29.0%	SERVICE BUCKET TRUCK	FL64	Electric	9/16/2025
1436	86073	29.0%	FLATBED/STAKE RACK	FL86A	Gas	8/12/2025
1437	E20394	29.0%	BACKHOE	FLE20	Gas	9/10/2025
1438	68564	29.0%	VAN	FL68	Gas	9/12/2025
1439	77873	29.1%	DIGGER DERRICK	FL77	Electric	4/18/2024
1440	22063	29.2%	PICKUP	FL22	Electric	6/4/2024
1441	59100	29.4%	FLATBED/STAKE RACK	FL59	Common	5/7/2025
1442	E79043	29.4%	DIRECTIONAL DRILL	FLE79	Gas	8/18/2025
1443	22383	29.4%	PICKUP	FL22	Common	9/5/2025
1444	23707	29.4%	VAN	FL23	Gas	9/11/2025
1445	39019	29.4%	CARGO VAN	FL39	Electric	9/12/2025
1446	64064	29.4%	SERVICE BUCKET TRUCK	FL64	Electric	9/12/2025
1447	23673	29.4%	VAN	FL23	Common	9/16/2025
1448	28595	29.4%	PICKUP	FL28	Common	9/16/2025
1449	39079	29.4%	CARGO VAN	FL39	Electric	9/16/2025
1450	E36064	29.4%	EXCAVATOR	FLE36	Gas	9/16/2025
1451	E82001	29.4%	FLEX TRACK	FLE82	Electric	9/16/2025

	A	B	C	D	E	F
1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
1452	07399	29.4%	SUV	FL07	Gas	9/17/2025
1453	27065	29.4%	PICKUP	FL27B	Gas	9/17/2025
1454	54354	29.4%	DUMP TRUCK	FL54	Gas	9/17/2025
1455	77163	29.4%	DIGGER DERRICK	FL77	Electric	9/17/2025
1456	89890	29.4%	BUCKET TRUCK	FL89	Electric	9/17/2025
1457	E11948	29.4%	TRENCHER	FLE11C	Electric	9/17/2025
1458	E36818	29.4%	EXCAVATOR	FLE36	Gas	9/17/2025
1459	E36885	29.4%	EXCAVATOR	FLE36	Electric	9/17/2025
1460	25000	29.5%	VAN	FL23	Gas	9/17/2025
1461	86088	29.5%	FLATBED/STAKE RACK	FL86B	Gas	9/3/2025
1462	E25053	29.6%	TOOL CARRIER	FLE25	Gas	3/21/2024
1463	44199	29.8%	GAS SERVICE TRUCK	FL44	Gas	1/15/2025
1464	38415	29.8%	PICKUP	FL28	Gas	8/28/2025
1465	44178	29.8%	GAS SERVICE TRUCK	FL44	Gas	9/8/2025
1466	07590	29.8%	SUV	FL07	Gas	9/15/2025
1467	22031	29.8%	PICKUP	FL22	Electric	9/15/2025
1468	28023	29.8%	PICKUP	FL28	Gas	9/16/2025
1469	E11040	29.8%	TRENCHER	FLE11B	Electric	9/16/2025
1470	E11828	29.8%	TRENCHER	FLE11B	Electric	9/16/2025
1471	E36948	29.8%	EXCAVATOR	FLE36	Electric	9/17/2025
1472	E36977	29.8%	EXCAVATOR	FLE36	Electric	9/17/2025
1473	E20986	30.0%	BACKHOE	FLE20	Gas	8/28/2025
1474	E79051	30.0%	DIRECTIONAL DRILL	FLE79	Gas	9/2/2025
1475	E79814	30.0%	DIRECTIONAL DRILL	FLE79	Gas	9/15/2025
1476	68584	30.0%	VAN	FL68	Gas	9/17/2025
1477	83068	30.0%	FLATBED/STAKE RACK	FL83	Gas	9/17/2025
1478	E20603	30.0%	BACKHOE	FLE20	Gas	9/17/2025
1479	36111	30.2%	PICKUP	FL36	Electric	7/1/2025
1480	25021	30.2%	VAN	FL23	Electric	8/6/2025
1481	57080	30.2%	CRANE	FL57	Gas	9/3/2025
1482	E20025	30.2%	BACKHOE	FLE20	Electric	9/3/2025
1483	E36959	30.2%	EXCAVATOR	FLE36	Electric	9/9/2025
1484	E78980	30.2%	FLEX TRACK	FLE78	Electric	9/9/2025
1485	22608	30.2%	PICKUP	FL22	Gas	9/10/2025
1486	26002	30.2%	PICKUP	FL26	Electric	9/11/2025
1487	22461	30.2%	PICKUP	FL22	Gas	9/12/2025
1488	06209	30.2%	SEDAN	FL06	Electric	9/15/2025
1489	24011	30.2%	VAN	FL23	Common	9/16/2025
1490	22144	30.2%	PICKUP	FL22	Gas	9/17/2025
1491	E11802	30.2%	TRENCHER	FLE11B	Electric	9/17/2025
1492	23464	30.2%	VAN	FL23	Gas	9/15/2025
1493	E99023	30.5%	TOOL CARRIER	FLE25	Gas	8/22/2025
1494	86033	30.5%	FLATBED/STAKE RACK	FL86A	Gas	9/10/2025
1495	E26024	30.5%	COMPACT LOADER	FLE26	Gas	9/17/2025
1496	43075	30.5%	DUMP TRUCK	FL43	Gas	9/17/2025
1497	89205	30.5%	BUCKET TRUCK	FL89	Electric	9/16/2025
1498	37214	30.5%	SERVICE TRUCK	FL37	Gas	9/17/2025
1499	39030	30.5%	CARGO VAN	FL39	Electric	9/17/2025
1500	59124	30.5%	FLATBED/STAKE RACK	FL59	Electric	9/17/2025
1501	64002	30.5%	SERVICE BUCKET TRUCK	FL64	Electric	9/17/2025

	A	B	C	D	E	F
1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
1502	64024	30.5%	SERVICE BUCKET TRUCK	FL64	Electric	9/17/2025
1503	E11132	30.5%	TRENCHER	FLE11B	Electric	9/17/2025
1504	22155	30.6%	PICKUP	FL22	Electric	10/16/2024
1505	23132	30.9%	VAN	FL23	Gas	8/19/2025
1506	28117	30.9%	PICKUP	FL28	Electric	9/9/2025
1507	75053	30.9%	DIGGER DERRICK	FL75	Electric	9/9/2025
1508	23153	30.9%	VAN	FL23	Gas	9/12/2025
1509	E20015	30.9%	BACKHOE	FLE20	Electric	9/12/2025
1510	22172	30.9%	PICKUP	FL22	Electric	9/16/2025
1511	22396	30.9%	PICKUP	FL22	Gas	9/16/2025
1512	28821	30.9%	PICKUP	FL28	Common	9/16/2025
1513	E36343	30.9%	EXCAVATOR	FLE36	Electric	9/16/2025
1514	E50846	30.9%	EXCAVATOR	FLE36	Gas	9/16/2025
1515	06086	30.9%	SEDAN	FL06	Common	9/17/2025
1516	20003	30.9%	PICKUP	FL22	Common	9/17/2025
1517	23194	30.9%	VAN	FL23	Gas	9/17/2025
1518	23444	30.9%	VAN	FL23	Gas	9/17/2025
1519	23603	30.9%	VAN	FL23	Gas	9/17/2025
1520	28031	30.9%	PICKUP	FL28	Common	9/17/2025
1521	28051	30.9%	PICKUP	FL28	Electric	9/17/2025
1522	28501	30.9%	PICKUP	FL28	Electric	9/17/2025
1523	36063	30.9%	PICKUP	FL36	Electric	9/17/2025
1524	39013	30.9%	CARGO VAN	FL39	Electric	9/17/2025
1525	E20964	31.0%	BACKHOE	FLE20	Gas	8/28/2025
1526	59074	31.0%	FLATBED/STAKE RACK	FL59	Gas	9/15/2025
1527	38462	31.3%	PICKUP	FL28	Electric	7/3/2025
1528	28273	31.3%	PICKUP	FL28	Electric	8/28/2025
1529	59125	31.3%	FLATBED/STAKE RACK	FL59	Common	9/11/2025
1530	E36704	31.3%	EXCAVATOR	FLE36	Gas	9/11/2025
1531	75029	31.3%	DIGGER DERRICK	FL75	Electric	9/12/2025
1532	22422	31.3%	PICKUP	FL22	Gas	9/16/2025
1533	30009	31.3%	PICKUP	FL22	Gas	9/16/2025
1534	07670	31.3%	SUV	FL07	Gas	9/17/2025
1535	39008	31.3%	CARGO VAN	FL39	Electric	9/17/2025
1536	41054	31.3%	PICKUP	FL41	Gas	9/17/2025
1537	59046	31.3%	FLATBED/STAKE RACK	FL59	Electric	9/17/2025
1538	86005	31.3%	FLATBED/STAKE RACK	FL86A	Common	9/17/2025
1539	E30024	31.4%	DOZER	FLE30	Gas	9/4/2025
1540	68704	31.4%	VAN	FL68	Gas	9/17/2025
1541	E79081	31.4%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
1542	E25827	31.5%	TOOL CARRIER	FLE25	Gas	4/2/2024
1543	07052	31.6%	SUV	FL07	Gas	9/17/2025
1544	36125	31.7%	PICKUP	FL36	Electric	8/5/2025
1545	22025	31.7%	PICKUP	FL22	Electric	9/8/2025
1546	28378	31.7%	PICKUP	FL28	Gas	9/8/2025
1547	38342	31.7%	PICKUP	FL28	Electric	9/12/2025
1548	28769	31.7%	PICKUP	FL28	Electric	9/15/2025
1549	82149	31.7%	BUCKET TRUCK	FL82	Electric	9/15/2025
1550	E36979	31.7%	EXCAVATOR	FLE36	Gas	9/15/2025
1551	06017	31.7%	SEDAN	FL06	Common	9/16/2025

	A	B	C	D	E	F
1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
1552	07238	31.7%	SUV	FL07	Gas	9/16/2025
1553	E36827	31.7%	EXCAVATOR	FLE36	Gas	9/16/2025
1554	23420	31.7%	VAN	FL23	Common	9/17/2025
1555	64232	31.7%	SERVICE BUCKET TRUCK	FL64	Electric	9/17/2025
1556	96099	31.7%	BUCKET TRUCK	FL96	Electric	9/17/2025
1557	E36284	31.7%	EXCAVATOR	FLE36	Electric	9/17/2025
1558	68214	31.9%	VAN	FL68	Gas	9/4/2025
1559	E10164	31.9%	TRENCHER	FLE11A	Gas	9/12/2025
1560	99812	31.9%	SERVICE TRUCK	FL37	Gas	9/17/2025
1561	59165	32.0%	PICKUP	FL28	Electric	6/24/2024
1562	64212	32.1%	SERVICE BUCKET TRUCK	FL64	Electric	7/25/2025
1563	39003	32.1%	CARGO VAN	FL39	Electric	9/12/2025
1564	22252	32.1%	PICKUP	FL22	Electric	9/16/2025
1565	07100	32.1%	SUV	FL07	Gas	9/17/2025
1566	39090	32.1%	CARGO VAN	FL39	Electric	9/17/2025
1567	54234	32.1%	DUMP TRUCK	FL54	Electric	9/17/2025
1568	E36984	32.1%	EXCAVATOR	FLE36	Electric	9/17/2025
1569	64006	32.3%	SERVICE BUCKET TRUCK	FL64	Electric	1/31/2024
1570	E79134	32.4%	DIRECTIONAL DRILL	FLE79	Gas	1/27/2025
1571	E22856	32.4%	COMPACT LOADER	FLE26	Gas	9/12/2025
1572	E35826	32.4%	EXCAVATOR	FLE36	Gas	9/8/2025
1573	28535	32.4%	PICKUP	FL28	Electric	9/12/2025
1574	43031	32.4%	DUMP TRUCK	FL43	Electric	9/15/2025
1575	39029	32.4%	CARGO VAN	FL39	Electric	9/16/2025
1576	06164	32.4%	SEDAN	FL06	Electric	9/17/2025
1577	90154	32.4%	SERVICE TRUCK	FL90	Gas	9/17/2025
1578	E36144	32.4%	EXCAVATOR	FLE36	Gas	9/17/2025
1579	E90122	32.6%	PERSONNEL CARRIER	FLE90	Gas	8/26/2024
1580	22361	32.8%	PICKUP	FL22	Gas	7/22/2025
1581	28401	32.8%	PICKUP	FL28	Common	9/5/2025
1582	22421	32.8%	PICKUP	FL22	Electric	9/9/2025
1583	86013	32.8%	FLATBED/STAKE RACK	FL86A	Electric	9/12/2025
1584	06019	32.8%	SEDAN	FL06	Common	9/16/2025
1585	28551	32.8%	PICKUP	FL28	Electric	9/16/2025
1586	94027	32.8%	BUCKET TRUCK	FL94	Electric	9/16/2025
1587	06095	32.8%	SEDAN	FL06	Common	9/17/2025
1588	28381	32.8%	PICKUP	FL28	Electric	9/17/2025
1589	29009	32.8%	PICKUP	FL28	Common	9/17/2025
1590	38065	32.8%	PICKUP	FL28	Common	9/17/2025
1591	89025	32.8%	BUCKET TRUCK	FL89	Electric	9/17/2025
1592	E82871	32.8%	FLEX TRACK	FLE82	Electric	9/17/2025
1593	E36756	32.9%	EXCAVATOR	FLE36	Gas	7/31/2025
1594	22102	33.2%	PICKUP	FL22	Electric	3/13/2025
1595	22596	33.2%	PICKUP	FL22	Gas	7/11/2025
1596	36053	33.2%	PICKUP	FL36	Common	7/31/2025
1597	07026	33.2%	SUV	FL07	Common	8/7/2025
1598	23213	33.2%	VAN	FL23	Gas	8/28/2025
1599	77023	33.2%	DIGGER DERRICK	FL77	Electric	9/4/2025
1600	41005	33.2%	PICKUP	FL41	Gas	9/8/2025
1601	07143	33.2%	SUV	FL07	Gas	9/9/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
1602	E81897	33.2%	FLEX TRACK	FLE78	Electric	9/9/2025
1603	E11074	33.2%	TRENCHER	FLE11B	Electric	9/10/2025
1604	28393	33.2%	PICKUP	FL28	Common	9/12/2025
1605	41030	33.2%	PICKUP	FL41	Gas	9/16/2025
1606	06036	33.2%	SEDAN	FL06	Electric	9/17/2025
1607	07860	33.2%	SUV	FL07	Gas	9/17/2025
1608	22382	33.2%	PICKUP	FL22	Gas	9/17/2025
1609	23077	33.2%	VAN	FL23	Gas	9/17/2025
1610	E36055	33.2%	EXCAVATOR	FLE36	Gas	9/17/2025
1611	83148	33.3%	FLATBED/STAKE RACK	FL83	Gas	9/17/2025
1612	E36163	33.3%	EXCAVATOR	FLE36	Gas	9/17/2025
1613	23152	33.6%	VAN	FL23	Gas	1/31/2025
1614	22706	33.6%	PICKUP	FL22	Gas	3/25/2025
1615	E82891	33.6%	FLEX TRACK	FLE82	Electric	8/18/2025
1616	27205	33.6%	PICKUP	FL27B	Common	9/11/2025
1617	22162	33.6%	PICKUP	FL22	Gas	9/12/2025
1618	28221	33.6%	PICKUP	FL28	Electric	9/12/2025
1619	E36998	33.6%	EXCAVATOR	FLE36	Electric	9/12/2025
1620	22212	33.6%	PICKUP	FL22	Electric	9/17/2025
1621	27270	33.6%	PICKUP	FL27B	Gas	9/17/2025
1622	28169	33.6%	PICKUP	FL28	Common	9/17/2025
1623	28225	33.6%	PICKUP	FL28	Gas	9/17/2025
1624	28737	33.6%	PICKUP	FL28	Gas	9/17/2025
1625	27951	33.7%	PICKUP	FL27B	Electric	8/12/2024
1626	86009	33.8%	FLATBED/STAKE RACK	FL86A	Gas	9/16/2025
1627	22113	34.0%	PICKUP	FL22	Common	3/24/2025
1628	27014	34.0%	PICKUP	FL27B	Electric	8/29/2025
1629	E11062	34.0%	TRENCHER	FLE11B	Electric	8/29/2025
1630	27200	34.0%	PICKUP	FL27B	Gas	9/8/2025
1631	E36277	34.0%	EXCAVATOR	FLE36	Gas	9/10/2025
1632	E73016	34.0%	EXCAVATOR	FLE73	Gas	9/10/2025
1633	28275	34.0%	PICKUP	FL28	Electric	9/16/2025
1634	E36167	34.0%	EXCAVATOR	FLE36	Electric	9/16/2025
1635	06044	34.0%	SEDAN	FL06	Common	9/17/2025
1636	59129	34.0%	FLATBED/STAKE RACK	FL59	Gas	9/17/2025
1637	27931	34.3%	PICKUP	FL27B	Electric	8/12/2024
1638	86018	34.3%	FLATBED/STAKE RACK	FL86B	Gas	7/11/2025
1639	E26034	34.3%	COMPACT LOADER	FLE26	Gas	9/15/2025
1640	86043	34.3%	FLATBED/STAKE RACK	FL86A	Gas	9/17/2025
1641	E26004	34.3%	COMPACT LOADER	FLE26	Gas	9/17/2025
1642	06074	34.4%	SEDAN	FL06	Electric	8/26/2025
1643	64141	34.4%	SERVICE BUCKET TRUCK	FL64	Electric	9/11/2025
1644	06093	34.4%	SEDAN	FL06	Common	9/15/2025
1645	23032	34.4%	VAN	FL23	Common	9/15/2025
1646	38375	34.4%	PICKUP	FL28	Electric	9/15/2025
1647	22191	34.4%	PICKUP	FL22	Gas	9/16/2025
1648	28517	34.4%	PICKUP	FL28	Electric	9/16/2025
1649	E36586	34.4%	EXCAVATOR	FLE36	Gas	9/17/2025
1650	55990	34.5%	DUMP TRUCK	FL55	Gas	11/18/2024
1651	E26100	34.7%	COMPACT LOADER	FLE26	Gas	8/22/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
1652	22173	34.7%	PICKUP	FL22	Electric	9/4/2025
1653	22284	34.7%	PICKUP	FL22	Electric	9/4/2025
1654	E79856	34.7%	DIRECTIONAL DRILL	FLE79	Gas	9/4/2025
1655	60016	34.7%	ELECTRIC SERVICE TRUCK	FL60	Electric	9/5/2025
1656	64844	34.7%	SERVICE BUCKET TRUCK	FL64	Electric	9/16/2025
1657	28155	34.7%	PICKUP	FL28	Gas	9/17/2025
1658	43036	34.7%	DUMP TRUCK	FL43	Electric	9/17/2025
1659	99819	34.7%	VACUUM TRUCK	FL46	Electric	9/17/2025
1660	E36133	34.7%	EXCAVATOR	FLE36	Electric	9/17/2025
1661	83088	34.8%	FLATBED/STAKE RACK	FL83	Gas	8/27/2025
1662	86147	34.8%	FLATBED/STAKE RACK	FL86A	Gas	9/8/2025
1663	85074	34.8%	OTR TRACTOR	FL85A	Gas	9/15/2025
1664	E20925	34.8%	BACKHOE	FLE20	Gas	9/17/2025
1665	E79006	34.8%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
1666	89977	34.8%	BUCKET TRUCK	FL89	Electric	2/26/2025
1667	28224	34.9%	PICKUP	FL28	Electric	8/15/2024
1668	22582	35.0%	PICKUP	FL22	Electric	11/12/2024
1669	23583	35.1%	VAN	FL23	Gas	7/10/2025
1670	32048	35.1%	PICKUP	FL22	Electric	7/15/2025
1671	43004	35.1%	DUMP TRUCK	FL43	Gas	9/9/2025
1672	06085	35.1%	SEDAN	FL06	Common	9/11/2025
1673	23130	35.1%	VAN	FL23	Gas	9/15/2025
1674	90073	35.1%	SERVICE TRUCK	FL90	Electric	9/16/2025
1675	06329	35.1%	SEDAN	FL06	Common	9/17/2025
1676	E36087	35.1%	EXCAVATOR	FLE36	Electric	9/17/2025
1677	85024	35.2%	OTR TRACTOR	FL85A	Gas	9/17/2025
1678	E35806	35.2%	EXCAVATOR	FLE36	Gas	9/17/2025
1679	E79061	35.2%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
1680	23192	35.4%	VAN	FL23	Gas	5/24/2024
1681	06468	35.5%	SEDAN	FL06	Common	9/23/2024
1682	E35854	35.5%	EXCAVATOR	FLE36	Gas	7/21/2025
1683	23215	35.5%	VAN	FL23	Gas	9/11/2025
1684	E79034	35.5%	DIRECTIONAL DRILL	FLE79	Gas	9/15/2025
1685	20263	35.5%	PICKUP	FL22	Common	9/16/2025
1686	22027	35.5%	PICKUP	FL22	Common	9/16/2025
1687	41091	35.5%	PICKUP	FL41	Gas	9/16/2025
1688	E35556	35.5%	EXCAVATOR	FLE36	Gas	9/16/2025
1689	22601	35.5%	PICKUP	FL22	Gas	9/17/2025
1690	45015	35.5%	FLEET SERVICE TRUCK	FL45	Common	9/17/2025
1691	E20030	35.5%	BACKHOE	FLE20	Gas	9/17/2025
1692	E36357	35.5%	EXCAVATOR	FLE36	Electric	9/17/2025
1693	22261	35.6%	PICKUP	FL22	Gas	4/10/2024
1694	E79164	35.7%	DIRECTIONAL DRILL	FLE79	Gas	9/15/2025
1695	29937	35.7%	PICKUP	FL28	Gas	9/17/2025
1696	E79944	35.7%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
1697	E36054	35.9%	EXCAVATOR	FLE36	Gas	9/5/2025
1698	90064	35.9%	SERVICE TRUCK	FL90	Gas	9/11/2025
1699	22521	35.9%	PICKUP	FL22	Gas	9/15/2025
1700	06126	35.9%	SEDAN	FL06	Common	9/17/2025
1701	22300	35.9%	PICKUP	FL22	Gas	9/17/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
1702	22689	35.9%	PICKUP	FL22	Electric	9/17/2025
1703	28040	35.9%	PICKUP	FL28	Common	9/17/2025
1704	28170	35.9%	PICKUP	FL28	Common	9/17/2025
1705	E36075	36.0%	EXCAVATOR	FLE36	Gas	8/8/2024
1706	E77806	36.2%	ROLLER	FLE77	Gas	7/17/2025
1707	E20002	36.2%	BACKHOE	FLE20	Gas	8/26/2025
1708	E79827	36.2%	DIRECTIONAL DRILL	FLE79	Gas	8/28/2025
1709	E36207	36.2%	EXCAVATOR	FLE36	Gas	9/5/2025
1710	22285	36.2%	PICKUP	FL22	Gas	9/17/2025
1711	E36123	36.2%	EXCAVATOR	FLE36	Gas	9/17/2025
1712	96109	36.2%	BUCKET TRUCK	FL96	Electric	6/26/2024
1713	59030	36.3%	FLATBED/STAKE RACK	FL59	Gas	4/28/2025
1714	E36001	36.3%	EXCAVATOR	FLE36	Electric	8/21/2025
1715	28146	36.3%	PICKUP	FL28	Common	8/25/2025
1716	E36709	36.3%	EXCAVATOR	FLE36	Gas	9/11/2025
1717	28180	36.3%	PICKUP	FL28	Common	9/15/2025
1718	06114	36.3%	SEDAN	FL06	Common	9/16/2025
1719	28409	36.3%	PICKUP	FL28	Electric	9/17/2025
1720	28471	36.3%	PICKUP	FL28	Common	9/17/2025
1721	36060	36.3%	PICKUP	FL36	Electric	9/17/2025
1722	E36006	36.3%	EXCAVATOR	FLE36	Gas	9/17/2025
1723	33024	36.4%	VAN	FL23	Gas	9/17/2025
1724	E36554	36.5%	EXCAVATOR	FLE36	Gas	9/17/2025
1725	23434	36.6%	VAN	FL23	Gas	8/5/2025
1726	64067	36.6%	SERVICE BUCKET TRUCK	FL64	Electric	8/14/2025
1727	E36137	36.6%	EXCAVATOR	FLE36	Electric	9/11/2025
1728	22260	36.6%	PICKUP	FL22	Electric	9/15/2025
1729	E11233	36.6%	TRENCHER	FLE11B	Electric	9/16/2025
1730	26082	36.6%	PICKUP	FL26	Electric	9/17/2025
1731	32829	36.6%	PICKUP	FL22	Gas	9/17/2025
1732	89187	36.6%	BUCKET TRUCK	FL89	Electric	9/17/2025
1733	86057	36.7%	FLATBED/STAKE RACK	FL86A	Gas	9/16/2025
1734	85015	36.7%	OTR TRACTOR	FL85A	Gas	9/17/2025
1735	E35876	36.7%	EXCAVATOR	FLE36	Gas	9/17/2025
1736	36050	36.8%	PICKUP	FL36	Gas	4/5/2024
1737	22369	37.0%	PICKUP	FL22	Electric	9/11/2025
1738	E79727	37.0%	DIRECTIONAL DRILL	FLE79	Gas	9/11/2025
1739	22210	37.0%	PICKUP	FL22	Electric	9/16/2025
1740	22612	37.0%	PICKUP	FL22	Gas	9/16/2025
1741	22651	37.0%	PICKUP	FL22	Electric	9/16/2025
1742	59114	37.0%	FLATBED/STAKE RACK	FL59	Electric	9/16/2025
1743	22148	37.0%	PICKUP	FL22	Gas	9/17/2025
1744	22161	37.0%	PICKUP	FL22	Electric	9/17/2025
1745	38155	37.0%	PICKUP	FL28	Common	9/17/2025
1746	89583	37.0%	BUCKET TRUCK	FL89	Electric	9/17/2025
1747	E36047	37.0%	EXCAVATOR	FLE36	Electric	9/17/2025
1748	59922	37.1%	FLATBED/STAKE RACK	FL59	Electric	9/17/2025
1749	E79885	37.2%	DIRECTIONAL DRILL	FLE79	Gas	9/8/2025
1750	22411	37.4%	PICKUP	FL22	Gas	8/22/2025
1751	22274	37.4%	PICKUP	FL22	Electric	8/28/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
1752	64145	37.4%	SERVICE BUCKET TRUCK	FL64	Electric	9/2/2025
1753	07960	37.4%	SUV	FL07	Gas	9/8/2025
1754	32649	37.4%	PICKUP	FL22	Electric	9/9/2025
1755	38632	37.4%	PICKUP	FL28	Electric	9/11/2025
1756	60000	37.4%	ELECTRIC SERVICE TRUCK	FL60	Electric	9/11/2025
1757	28310	37.4%	PICKUP	FL28	Common	9/16/2025
1758	90142	37.4%	SERVICE TRUCK	FL90	Electric	9/16/2025
1759	28415	37.4%	PICKUP	FL28	Gas	9/17/2025
1760	37019	37.4%	SERVICE TRUCK	FL37	Gas	9/17/2025
1761	39010	37.4%	CARGO VAN	FL39	Electric	9/17/2025
1762	54023	37.4%	DUMP TRUCK	FL54	Gas	9/17/2025
1763	E11896	37.4%	TRENCHER	FLE11B	Electric	9/17/2025
1764	E36936	37.4%	EXCAVATOR	FLE36	Gas	9/17/2025
1765	22846	37.4%	PICKUP	FL22	Gas	5/23/2024
1766	77895	37.6%	DIGGER DERRICK	FL77	Electric	9/17/2025
1767	E36875	37.6%	EXCAVATOR	FLE36	Gas	9/11/2025
1768	86107	37.6%	FLATBED/STAKE RACK	FL86A	Gas	9/17/2025
1769	22431	37.8%	PICKUP	FL22	Common	9/2/2025
1770	E22011	37.8%	UTILITY TRACTOR	FLE23	Common	9/11/2025
1771	22216	37.8%	PICKUP	FL22	Gas	9/16/2025
1772	22123	37.8%	PICKUP	FL22	Gas	9/17/2025
1773	77137	37.8%	DIGGER DERRICK	FL77	Electric	9/17/2025
1774	89039	37.8%	BUCKET TRUCK	FL89	Electric	9/17/2025
1775	89184	37.8%	BUCKET TRUCK	FL89	Electric	9/17/2025
1776	22064	37.9%	PICKUP	FL22	Electric	9/16/2025
1777	64005	37.9%	SERVICE BUCKET TRUCK	FL64	Electric	10/2/2024
1778	E79071	38.1%	DIRECTIONAL DRILL	FLE79	Gas	9/15/2025
1779	90174	38.1%	SERVICE TRUCK	FL90	Gas	9/17/2025
1780	22170	38.2%	PICKUP	FL22	Gas	8/28/2025
1781	07006	38.2%	SUV	FL07	Common	9/8/2025
1782	64085	38.2%	SERVICE BUCKET TRUCK	FL64	Electric	9/9/2025
1783	20001	38.2%	PICKUP	FL22	Common	9/10/2025
1784	25388	38.2%	VAN	FL23	Electric	9/10/2025
1785	83138	38.2%	FLATBED/STAKE RACK	FL83	Gas	9/10/2025
1786	07188	38.2%	SUV	FL07	Electric	9/16/2025
1787	30599	38.2%	PICKUP	FL22	Electric	9/16/2025
1788	06103	38.2%	SEDAN	FL06	Electric	9/17/2025
1789	07830	38.2%	SUV	FL07	Gas	9/17/2025
1790	10000	38.2%	PICKUP	FL22	Gas	9/17/2025
1791	27107	38.2%	PICKUP	FL27B	Common	9/17/2025
1792	28523	38.2%	PICKUP	FL28	Gas	9/17/2025
1793	44328	38.2%	GAS SERVICE TRUCK	FL44	Gas	9/17/2025
1794	45005	38.2%	FLEET SERVICE TRUCK	FL45	Common	9/17/2025
1795	45011	38.2%	FLEET SERVICE TRUCK	FL45	Common	9/17/2025
1796	38442	38.3%	PICKUP	FL28	Electric	8/22/2024
1797	07016	38.3%	SUV	FL07	Common	9/17/2024
1798	33638	38.4%	VAN	FL23	Gas	6/5/2024
1799	54062	38.5%	DUMP TRUCK	FL54	Gas	9/5/2025
1800	28527	38.5%	PICKUP	FL28	Electric	9/10/2025
1801	07880	38.5%	SUV	FL07	Common	9/11/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
1802	45809	38.5%	FLEET SERVICE TRUCK	FL45	Common	9/12/2025
1803	E79036	38.5%	DIRECTIONAL DRILL	FLE79	Gas	9/15/2025
1804	90193	38.5%	SERVICE TRUCK	FL90	Electric	9/16/2025
1805	06024	38.5%	SEDAN	FL06	Common	9/17/2025
1806	22015	38.5%	PICKUP	FL22	Gas	9/17/2025
1807	23569	38.5%	VAN	FL23	Electric	9/17/2025
1808	28120	38.5%	PICKUP	FL28	Common	9/17/2025
1809	E11155	38.5%	TRENCHER	FLE11B	Electric	9/17/2025
1810	E22841	38.5%	COMPACT LOADER	FLE26	Gas	9/17/2025
1811	E79141	38.5%	DIRECTIONAL DRILL	FLE79	Electric	9/17/2025
1812	38281	38.9%	PICKUP	FL28	Gas	1/10/2025
1813	28772	38.9%	PICKUP	FL28	Electric	5/27/2025
1814	22516	38.9%	PICKUP	FL22	Gas	6/3/2025
1815	E36969	38.9%	EXCAVATOR	FLE36	Gas	7/30/2025
1816	24046	38.9%	VAN	FL23	Gas	8/22/2025
1817	64044	38.9%	SERVICE BUCKET TRUCK	FL64	Electric	9/10/2025
1818	E36257	38.9%	EXCAVATOR	FLE36	Gas	9/10/2025
1819	90084	38.9%	SERVICE TRUCK	FL90	Gas	9/11/2025
1820	36005	38.9%	PICKUP	FL36	Electric	9/15/2025
1821	39009	38.9%	CARGO VAN	FL39	Electric	9/15/2025
1822	90108	38.9%	SERVICE TRUCK	FL90	Electric	9/15/2025
1823	06213	38.9%	SEDAN	FL06	Common	9/16/2025
1824	07007	38.9%	SUV	FL07	Common	9/16/2025
1825	22721	38.9%	PICKUP	FL22	Electric	9/16/2025
1826	28441	38.9%	PICKUP	FL28	Common	9/16/2025
1827	90022	38.9%	SERVICE TRUCK	FL90	Electric	9/16/2025
1828	E36134	38.9%	EXCAVATOR	FLE36	Gas	9/16/2025
1829	07131	38.9%	SUV	FL07	Gas	9/17/2025
1830	28389	38.9%	PICKUP	FL28	Electric	9/17/2025
1831	28563	38.9%	PICKUP	FL28	Gas	9/17/2025
1832	E11741	38.9%	TRENCHER	FLE11B	Electric	9/17/2025
1833	E20041	38.9%	BACKHOE	FLE20	Gas	9/17/2025
1834	E36347	38.9%	EXCAVATOR	FLE36	Electric	9/17/2025
1835	E79121	38.9%	DIRECTIONAL DRILL	FLE79	Electric	9/17/2025
1836	E79131	38.9%	DIRECTIONAL DRILL	FLE79	Electric	9/17/2025
1837	E20954	39.0%	BACKHOE	FLE20	Gas	9/16/2025
1838	28161	39.1%	PICKUP	FL28	Electric	3/28/2024
1839	E79824	39.3%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
1840	28468	39.3%	PICKUP	FL28	Gas	4/3/2025
1841	25111	39.3%	VAN	FL23	Electric	5/22/2025
1842	06139	39.3%	SEDAN	FL06	Electric	8/14/2025
1843	90098	39.3%	SERVICE TRUCK	FL90	Gas	8/26/2025
1844	32639	39.3%	PICKUP	FL22	Gas	9/11/2025
1845	E36303	39.3%	EXCAVATOR	FLE36	Gas	9/11/2025
1846	06113	39.3%	SEDAN	FL06	Common	9/12/2025
1847	06064	39.3%	SEDAN	FL06	Common	9/17/2025
1848	07419	39.3%	SUV	FL07	Gas	9/17/2025
1849	22324	39.3%	PICKUP	FL22	Electric	9/17/2025
1850	22691	39.3%	PICKUP	FL22	Gas	9/17/2025
1851	23285	39.3%	VAN	FL23	Common	9/17/2025

	A	B	C	D	E	F
1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
1852	28315	39.3%	PICKUP	FL28	Gas	9/17/2025
1853	28347	39.3%	PICKUP	FL28	Common	9/17/2025
1854	38622	39.3%	PICKUP	FL28	Electric	9/17/2025
1855	44362	39.3%	GAS SERVICE TRUCK	FL44	Gas	9/17/2025
1856	45052	39.3%	FLEET SERVICE TRUCK	FL45	Common	9/17/2025
1857	77265	39.3%	DIGGER DERRICK	FL77	Electric	9/17/2025
1858	89095	39.3%	BUCKET TRUCK	FL89	Electric	9/17/2025
1859	77843	39.4%	DIGGER DERRICK	FL77	Electric	9/17/2025
1860	54953	39.4%	DUMP TRUCK	FL54	Electric	9/12/2025
1861	28543	39.5%	PICKUP	FL28	Gas	9/17/2025
1862	E79787	39.5%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
1863	E79807	39.5%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
1864	E79816	39.5%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
1865	89933	39.5%	BUCKET TRUCK	FL89	Electric	9/17/2025
1866	23142	39.7%	VAN	FL23	Gas	12/10/2024
1867	24006	39.7%	VAN	FL23	Gas	9/9/2025
1868	E36759	39.7%	EXCAVATOR	FLE36	Gas	9/12/2025
1869	22225	39.7%	PICKUP	FL22	Electric	9/16/2025
1870	89227	39.7%	BUCKET TRUCK	FL89	Electric	9/16/2025
1871	22043	39.7%	PICKUP	FL22	Electric	9/17/2025
1872	22145	39.7%	PICKUP	FL22	Electric	9/17/2025
1873	22562	39.7%	PICKUP	FL22	Common	9/17/2025
1874	23243	39.7%	VAN	FL23	Gas	9/17/2025
1875	28602	39.7%	PICKUP	FL28	Electric	9/17/2025
1876	41012	39.7%	PICKUP	FL41	Gas	9/17/2025
1877	44392	39.7%	GAS SERVICE TRUCK	FL44	Gas	9/17/2025
1878	96079	39.7%	BUCKET TRUCK	FL96	Electric	9/17/2025
1879	41059	39.8%	PICKUP	FL41	Gas	8/22/2024
1880	39820	40.0%	CARGO VAN	FL39	Gas	8/15/2024
1881	E36103	40.0%	EXCAVATOR	FLE36	Gas	2/17/2025
1882	E36944	40.0%	EXCAVATOR	FLE36	Gas	9/8/2025
1883	68444	40.0%	VAN	FL68	Gas	9/17/2025
1884	23553	40.1%	VAN	FL23	Gas	6/18/2025
1885	E80850	40.1%	FLEX TRACK	FLE78	Electric	9/5/2025
1886	45039	40.1%	FLEET SERVICE TRUCK	FL45	Common	9/12/2025
1887	08110	40.1%	SUV	FL07	Electric	9/17/2025
1888	23535	40.1%	VAN	FL23	Gas	9/17/2025
1889	30639	40.1%	PICKUP	FL22	Electric	9/17/2025
1890	38911	40.1%	PICKUP	FL28	Electric	9/17/2025
1891	61000	40.1%	SERVICE BUCKET TRUCK	FL64	Electric	9/17/2025
1892	75063	40.1%	DIGGER DERRICK	FL75	Electric	9/17/2025
1893	77204	40.1%	DIGGER DERRICK	FL77	Electric	9/17/2025
1894	E36851	40.1%	EXCAVATOR	FLE36	Electric	9/17/2025
1895	E50806	40.1%	EXCAVATOR	FLE36	Gas	9/17/2025
1896	06212	40.5%	SEDAN	FL06	Common	8/27/2025
1897	28660	40.5%	PICKUP	FL28	Electric	8/28/2025
1898	29004	40.5%	PICKUP	FL28	Gas	9/8/2025
1899	28405	40.5%	PICKUP	FL28	Common	9/12/2025
1900	06219	40.5%	SEDAN	FL06	Common	9/15/2025
1901	E36037	40.5%	EXCAVATOR	FLE36	Electric	9/16/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
1902	E36171	40.5%	EXCAVATOR	FLE36	Electric	9/16/2025
1903	06146	40.5%	SEDAN	FL06	Common	9/17/2025
1904	07201	40.5%	SUV	FL07	Gas	9/17/2025
1905	07320	40.5%	SUV	FL07	Common	9/17/2025
1906	22458	40.5%	PICKUP	FL22	Electric	9/17/2025
1907	38215	40.5%	PICKUP	FL28	Common	9/17/2025
1908	39049	40.5%	CARGO VAN	FL39	Electric	9/17/2025
1909	41060	40.5%	PICKUP	FL41	Gas	9/17/2025
1910	89387	40.5%	BUCKET TRUCK	FL89	Electric	9/17/2025
1911	68394	40.5%	VAN	FL68	Gas	9/15/2025
1912	59817	40.5%	FLATBED/STAKE RACK	FL59	Gas	9/17/2025
1913	E79887	40.5%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
1914	E36861	40.8%	EXCAVATOR	FLE36	Gas	5/8/2025
1915	06233	40.8%	SEDAN	FL06	Common	8/5/2025
1916	E36836	40.8%	EXCAVATOR	FLE36	Gas	9/4/2025
1917	28134	40.8%	PICKUP	FL28	Electric	9/5/2025
1918	22235	40.8%	PICKUP	FL22	Electric	9/9/2025
1919	90009	40.8%	SERVICE TRUCK	FL90	Electric	9/10/2025
1920	44037	40.8%	GAS SERVICE TRUCK	FL44	Gas	9/12/2025
1921	23193	40.8%	VAN	FL23	Gas	9/15/2025
1922	07049	40.8%	SUV	FL07	Electric	9/16/2025
1923	38175	40.8%	PICKUP	FL28	Gas	9/16/2025
1924	06439	40.8%	SEDAN	FL06	Common	9/17/2025
1925	22353	40.8%	PICKUP	FL22	Gas	9/17/2025
1926	26001	40.8%	PICKUP	FL26	Electric	9/17/2025
1927	27230	40.8%	PICKUP	FL27B	Gas	9/17/2025
1928	28113	40.8%	PICKUP	FL28	Common	9/17/2025
1929	32719	40.8%	PICKUP	FL22	Electric	9/17/2025
1930	38325	40.8%	PICKUP	FL28	Electric	9/17/2025
1931	38425	40.8%	PICKUP	FL28	Gas	9/17/2025
1932	97004	40.8%	BUCKET TRUCK	FL97	Electric	9/17/2025
1933	E36808	40.8%	EXCAVATOR	FLE36	Gas	9/17/2025
1934	86044	41.0%	FLATBED/STAKE RACK	FL86A	Gas	9/15/2025
1935	28167	41.0%	PICKUP	FL28	Gas	9/17/2025
1936	07014	41.1%	SUV	FL07	Common	9/9/2025
1937	28553	41.2%	PICKUP	FL28	Electric	6/3/2025
1938	38139	41.2%	PICKUP	FL28	Electric	7/18/2025
1939	29019	41.2%	PICKUP	FL28	Common	8/28/2025
1940	64127	41.2%	SERVICE BUCKET TRUCK	FL64	Electric	8/28/2025
1941	55831	41.2%	DUMP TRUCK	FL54	Electric	9/4/2025
1942	28555	41.2%	PICKUP	FL28	Electric	9/5/2025
1943	36110	41.2%	PICKUP	FL36	Electric	9/11/2025
1944	64117	41.2%	SERVICE BUCKET TRUCK	FL64	Electric	9/11/2025
1945	06125	41.2%	SEDAN	FL06	Common	9/15/2025
1946	75041	41.2%	DIGGER DERRICK	FL75	Electric	9/16/2025
1947	07339	41.2%	SUV	FL07	Gas	9/17/2025
1948	22001	41.2%	PICKUP	FL22	Common	9/17/2025
1949	22164	41.2%	PICKUP	FL22	Common	9/17/2025
1950	32068	41.2%	PICKUP	FL22	Electric	9/17/2025
1951	44024	41.2%	GAS SERVICE TRUCK	FL44	Gas	9/17/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
1952	44205	41.2%	GAS SERVICE TRUCK	FL44	Gas	9/17/2025
1953	64105	41.2%	SERVICE BUCKET TRUCK	FL64	Electric	9/17/2025
1954	89137	41.2%	BUCKET TRUCK	FL89	Electric	9/17/2025
1955	E36307	41.2%	EXCAVATOR	FLE36	Gas	9/17/2025
1956	23734	41.3%	VAN	FL23	Gas	9/3/2024
1957	E20072	41.4%	BACKHOE	FLE20	Gas	9/16/2025
1958	E79918	41.4%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
1959	28770	41.6%	PICKUP	FL28	Electric	8/27/2024
1960	23229	41.6%	84	FL_23A	Gas	1/6/2025
1961	86024	41.6%	FLATBED/STAKE RACK	FL86A	Electric	8/14/2025
1962	07550	41.6%	SUV	FL07	Common	9/16/2025
1963	22571	41.6%	PICKUP	FL22	Electric	9/16/2025
1964	22591	41.6%	PICKUP	FL22	Electric	9/16/2025
1965	30589	41.6%	PICKUP	FL22	Electric	9/16/2025
1966	06134	41.6%	SEDAN	FL06	Common	9/17/2025
1967	22179	41.6%	PICKUP	FL22	Gas	9/17/2025
1968	23124	41.6%	VAN	FL23	Gas	9/17/2025
1969	28193	41.6%	PICKUP	FL28	Electric	9/17/2025
1970	28561	41.6%	PICKUP	FL28	Electric	9/17/2025
1971	77215	41.6%	DIGGER DERRICK	FL77	Electric	9/17/2025
1972	E35888	41.6%	EXCAVATOR	FLE36	Electric	9/17/2025
1973	E20904	41.9%	BACKHOE	FLE20	Gas	9/11/2025
1974	E20114	41.9%	BACKHOE	FLE20	Gas	9/15/2025
1975	22384	41.9%	PICKUP	FL22	Gas	9/16/2025
1976	22194	42.0%	PICKUP	FL22	Common	9/27/2024
1977	22742	42.0%	PICKUP	FL22	Common	12/18/2024
1978	06243	42.0%	SEDAN	FL06	Common	1/13/2025
1979	28245	42.0%	PICKUP	FL28	Common	9/8/2025
1980	E36005	42.0%	EXCAVATOR	FLE36	Electric	9/16/2025
1981	06025	42.0%	SEDAN	FL06	Gas	9/17/2025
1982	07539	42.0%	SUV	FL07	Gas	9/17/2025
1983	22330	42.0%	PICKUP	FL22	Electric	9/17/2025
1984	60082	42.0%	ELECTRIC SERVICE TRUCK	FL60	Electric	9/17/2025
1985	E60154	42.2%	FORKLIFT	FLE60	Gas	10/24/2024
1986	23574	42.4%	VAN	FL23	Gas	6/2/2025
1987	07028	42.4%	SUV	FL07	Gas	9/12/2025
1988	59155	42.4%	FLATBED/STAKE RACK	FL59	Common	9/16/2025
1989	77135	42.4%	DIGGER DERRICK	FL77	Electric	9/16/2025
1990	06133	42.4%	SEDAN	FL06	Electric	9/17/2025
1991	22154	42.4%	PICKUP	FL22	Common	9/17/2025
1992	22171	42.4%	PICKUP	FL22	Electric	9/17/2025
1993	30929	42.4%	PICKUP	FL22	Electric	9/17/2025
1994	44288	42.4%	GAS SERVICE TRUCK	FL44	Gas	9/17/2025
1995	59907	42.4%	FLATBED/STAKE RACK	FL59	Gas	9/17/2025
1996	96009	42.4%	BUCKET TRUCK	FL96	Electric	9/17/2025
1997	E11837	42.4%	TRENCHER	FLE11B	Electric	9/17/2025
1998	86016	42.4%	FLATBED/STAKE RACK	FL86A	Gas	9/15/2025
1999	E79895	42.4%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
2000	E73003	42.7%	WHEEL LOADER	FLE73	Gas	9/10/2025
2001	45099	42.7%	FLEET SERVICE TRUCK	FL45	Common	1/15/2025

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
2002	E79915	42.7%	DIRECTIONAL DRILL	FLE79	Gas	5/5/2025
2003	E36015	42.7%	EXCAVATOR	FLE36	Gas	8/12/2025
2004	44005	42.7%	GAS SERVICE TRUCK	FL44	Gas	8/20/2025
2005	24064	42.7%	VAN	FL23	Gas	9/2/2025
2006	38792	42.7%	PICKUP	FL28	Electric	9/4/2025
2007	61010	42.7%	SERVICE BUCKET TRUCK	FL64	Electric	9/11/2025
2008	38311	42.7%	PICKUP	FL28	Common	9/12/2025
2009	E36991	42.7%	EXCAVATOR	FLE36	Gas	9/12/2025
2010	06259	42.7%	SEDAN	FL06	Common	9/16/2025
2011	28533	42.7%	PICKUP	FL28	Common	9/16/2025
2012	06012	42.7%	SEDAN	FL06	Common	9/17/2025
2013	08120	42.7%	SUV	FL07	Electric	9/17/2025
2014	28613	42.7%	PICKUP	FL28	Gas	9/17/2025
2015	44025	42.7%	GAS SERVICE TRUCK	FL44	Gas	9/17/2025
2016	45055	42.7%	FLEET SERVICE TRUCK	FL45	Common	9/17/2025
2017	45807	42.7%	FLEET SERVICE TRUCK	FL45	Common	9/17/2025
2018	E36961	42.7%	EXCAVATOR	FLE36	Gas	9/17/2025
2019	07063	42.9%	SUV	FL07	Gas	8/14/2024
2020	E79012	42.9%	DIRECTIONAL DRILL	FLE79	Gas	6/30/2025
2021	E79857	42.9%	DIRECTIONAL DRILL	FLE79	Gas	8/15/2025
2022	68534	42.9%	VAN	FL68	Gas	9/17/2025
2023	23693	43.1%	VAN	FL23	Gas	1/6/2025
2024	86077	43.1%	FLATBED/STAKE RACK	FL86A	Gas	7/30/2025
2025	64084	43.1%	SERVICE BUCKET TRUCK	FL64	Electric	9/15/2025
2026	08060	43.1%	SUV	FL07	Gas	9/17/2025
2027	22403	43.1%	PICKUP	FL22	Common	9/17/2025
2028	23230	43.1%	VAN	FL23	Gas	9/17/2025
2029	23674	43.1%	VAN	FL23	Gas	9/17/2025
2030	28583	43.1%	PICKUP	FL28	Electric	9/17/2025
2031	44125	43.1%	GAS SERVICE TRUCK	FL44	Gas	9/17/2025
2032	44348	43.1%	GAS SERVICE TRUCK	FL44	Gas	9/17/2025
2033	E90015	43.1%	PERSONNEL CARRIER	FLE90	Gas	9/17/2025
2034	22752	43.3%	PICKUP	FL22	Common	11/13/2024
2035	E79225	43.3%	DIRECTIONAL DRILL	FLE79	Gas	9/15/2025
2036	E20876	43.3%	BACKHOE	FLE20	Gas	9/17/2025
2037	77044	43.5%	DIGGER DERRICK	FL77	Electric	5/5/2025
2038	41043	43.5%	PICKUP	FL41	Gas	9/4/2025
2039	90002	43.5%	SERVICE TRUCK	FL90	Electric	9/10/2025
2040	22231	43.5%	PICKUP	FL22	Gas	9/15/2025
2041	07829	43.5%	SUV	FL07	Common	9/16/2025
2042	23514	43.5%	VAN	FL23	Gas	9/17/2025
2043	28547	43.5%	PICKUP	FL28	Electric	9/17/2025
2044	96040	43.5%	BUCKET TRUCK	FL96	Electric	9/17/2025
2045	E36147	43.5%	EXCAVATOR	FLE36	Electric	9/17/2025
2046	E36227	43.5%	EXCAVATOR	FLE36	Electric	9/17/2025
2047	22163	43.7%	PICKUP	FL22	Gas	9/17/2025
2048	E36187	43.8%	EXCAVATOR	FLE36	Gas	9/9/2025
2049	22315	43.8%	PICKUP	FL22	Gas	9/17/2025
2050	28317	43.9%	PICKUP	FL28	Gas	8/28/2024
2051	22297	43.9%	PICKUP	FL22	Electric	12/13/2024

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1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
2052	28037	43.9%	PICKUP	FL28	Electric	1/31/2025
2053	23204	43.9%	VAN	FL23	Gas	8/18/2025
2054	22273	43.9%	PICKUP	FL22	Gas	9/11/2025
2055	E82809	43.9%	FLEX TRACK	FLE82	Electric	9/12/2025
2056	22628	43.9%	PICKUP	FL22	Gas	9/15/2025
2057	28087	43.9%	PICKUP	FL28	Common	9/16/2025
2058	E99011	43.9%	TOOL CARRIER	FLE25	Gas	9/16/2025
2059	06116	43.9%	SEDAN	FL06	Electric	9/17/2025
2060	07208	43.9%	SUV	FL07	Gas	9/17/2025
2061	23544	43.9%	VAN	FL23	Gas	9/17/2025
2062	28905	43.9%	PICKUP	FL28	Common	9/17/2025
2063	45109	43.9%	FLEET SERVICE TRUCK	FL45	Common	9/17/2025
2064	45837	43.9%	FLEET SERVICE TRUCK	FL45	Common	9/17/2025
2065	75004	43.9%	DIGGER DERRICK	FL75	Electric	9/17/2025
2066	90092	43.9%	SERVICE TRUCK	FL90	Electric	9/17/2025
2067	E22830	43.9%	COMPACT LOADER	FLE26	Gas	9/17/2025
2068	89814	43.9%	BUCKET TRUCK	FL89	Electric	9/17/2025
2069	20133	44.3%	PICKUP	FL22	Gas	7/14/2025
2070	28623	44.3%	PICKUP	FL28	Gas	7/25/2025
2071	44279	44.3%	GAS SERVICE TRUCK	FL44	Gas	9/3/2025
2072	E50826	44.3%	EXCAVATOR	FLE36	Gas	9/15/2025
2073	07749	44.3%	SUV	FL07	Common	9/16/2025
2074	27009	44.3%	PICKUP	FL27B	Gas	9/17/2025
2075	28531	44.3%	PICKUP	FL28	Common	9/17/2025
2076	54013	44.3%	DUMP TRUCK	FL54	Gas	9/17/2025
2077	E36237	44.3%	EXCAVATOR	FLE36	Electric	9/17/2025
2078	E79917	44.3%	DIRECTIONAL DRILL	FLE79	Gas	9/16/2025
2079	86198	44.3%	FLATBED/STAKE RACK	FL86B	Gas	9/17/2025
2080	90034	44.3%	SERVICE TRUCK	FL90	Gas	9/17/2025
2081	22012	44.7%	PICKUP	FL22	Common	1/24/2025
2082	77184	44.7%	DIGGER DERRICK	FL77	Electric	7/31/2025
2083	E82911	44.7%	FLEX TRACK	FLE82	Electric	8/19/2025
2084	23173	44.7%	VAN	FL23	Gas	8/25/2025
2085	06039	44.7%	SEDAN	FL06	Electric	9/16/2025
2086	22298	44.7%	PICKUP	FL22	Common	9/16/2025
2087	38301	44.7%	PICKUP	FL28	Common	9/16/2025
2088	E36367	44.7%	EXCAVATOR	FLE36	Gas	9/16/2025
2089	07061	44.7%	SUV	FL07	Gas	9/17/2025
2090	22023	44.7%	PICKUP	FL22	Electric	9/17/2025
2091	27112	44.7%	PICKUP	FL27B	Gas	9/17/2025
2092	28098	44.7%	PICKUP	FL28	Gas	9/17/2025
2093	90053	44.8%	SERVICE TRUCK	FL90	Gas	9/17/2025
2094	E20794	44.8%	BACKHOE	FLE20	Gas	9/17/2025
2095	E79907	44.8%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
2096	59852	45.0%	FLATBED/STAKE RACK	FL59	Electric	9/12/2025
2097	E36729	45.0%	EXCAVATOR	FLE36	Gas	9/15/2025
2098	23019	45.0%	VAN	FL23	Gas	9/16/2025
2099	28361	45.0%	PICKUP	FL28	Common	9/17/2025
2100	30769	45.0%	PICKUP	FL22	Common	9/17/2025
2101	38079	45.0%	PICKUP	FL28	Electric	9/17/2025

	A	B	C	D	E	F
1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
2102	85004	45.0%	OTR TRACTOR	FL85A	Common	9/17/2025
2103	E36193	45.0%	EXCAVATOR	FLE36	Gas	9/17/2025
2104	E50828	45.0%	EXCAVATOR	FLE36	Gas	9/17/2025
2105	E26834	45.2%	COMPACT LOADER	FLE26	Gas	9/12/2025
2106	E79957	45.2%	DIRECTIONAL DRILL	FLE79	Gas	9/12/2025
2107	E36043	45.2%	EXCAVATOR	FLE36	Gas	9/16/2025
2108	07700	45.2%	SUV	FL07	Gas	9/17/2025
2109	68674	45.2%	VAN	FL68	Gas	9/17/2025
2110	28502	45.4%	83	FL_28	Electric	3/10/2025
2111	28621	45.4%	PICKUP	FL28	Gas	6/20/2025
2112	07340	45.4%	SUV	FL07	Electric	8/21/2025
2113	22097	45.4%	PICKUP	FL22	Common	9/11/2025
2114	22271	45.4%	PICKUP	FL22	Gas	9/16/2025
2115	28400	45.4%	PICKUP	FL28	Common	9/16/2025
2116	77225	45.4%	DIGGER DERRICK	FL77	Electric	9/17/2025
2117	90058	45.4%	SERVICE TRUCK	FL90	Gas	9/17/2025
2118	E36947	45.4%	EXCAVATOR	FLE36	Gas	9/17/2025
2119	22466	45.5%	PICKUP	FL22	Gas	5/20/2024
2120	75859	45.5%	DIGGER DERRICK	FL75	Electric	2/18/2025
2121	77825	45.5%	DIGGER DERRICK	FL77	Electric	9/15/2025
2122	27961	45.7%	PICKUP	FL27B	Electric	8/12/2024
2123	83118	45.7%	FLATBED/STAKE RACK	FL83	Gas	9/10/2025
2124	E36344	45.7%	EXCAVATOR	FLE36	Electric	9/12/2025
2125	E99024	45.7%	TOOL CARRIER	FLE25	Gas	9/17/2025
2126	28677	45.8%	PICKUP	FL28	Electric	7/25/2025
2127	41013	45.8%	PICKUP	FL41	Gas	8/15/2025
2128	E79016	45.8%	DIRECTIONAL DRILL	FLE79	Gas	9/11/2025
2129	28029	45.8%	PICKUP	FL28	Common	9/15/2025
2130	28383	45.8%	PICKUP	FL28	Common	9/15/2025
2131	28359	45.8%	PICKUP	FL28	Gas	9/17/2025
2132	38149	45.8%	PICKUP	FL28	Electric	9/17/2025
2133	45061	45.8%	FLEET SERVICE TRUCK	FL45	Common	9/17/2025
2134	E36855	45.8%	EXCAVATOR	FLE36	Gas	9/17/2025
2135	22041	45.8%	PICKUP	FL22	Gas	10/22/2024
2136	23744	46.1%	VAN	FL23	Gas	9/17/2025
2137	23834	46.2%	VAN	FL23	Gas	8/18/2025
2138	E36988	46.2%	EXCAVATOR	FLE36	Gas	9/11/2025
2139	07150	46.2%	SUV	FL07	Gas	9/15/2025
2140	07380	46.2%	SUV	FL07	Gas	9/17/2025
2141	07840	46.2%	SUV	FL07	Gas	9/17/2025
2142	22778	46.2%	PICKUP	FL22	Gas	9/17/2025
2143	28188	46.2%	PICKUP	FL28	Common	9/17/2025
2144	28667	46.2%	PICKUP	FL28	Electric	9/17/2025
2145	44378	46.2%	GAS SERVICE TRUCK	FL44	Gas	9/17/2025
2146	E36161	46.2%	EXCAVATOR	FLE36	Gas	9/11/2025
2147	82085	46.6%	BUCKET TRUCK	FL82	Electric	9/8/2025
2148	86037	46.6%	FLATBED/STAKE RACK	FL86A	Gas	9/11/2025
2149	28447	46.6%	PICKUP	FL28	Electric	9/15/2025
2150	28451	46.6%	PICKUP	FL28	Electric	9/15/2025
2151	28090	46.6%	PICKUP	FL28	Common	9/16/2025

	A	B	C	D	E	F
1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
2152	22183	46.6%	PICKUP	FL22	Common	9/17/2025
2153	23281	46.6%	VAN	FL23	Gas	9/17/2025
2154	30909	46.6%	PICKUP	FL22	Electric	9/17/2025
2155	83038	46.7%	FLATBED/STAKE RACK	FL83	Gas	9/8/2025
2156	83018	46.7%	FLATBED/STAKE RACK	FL83	Gas	9/17/2025
2157	41048	46.9%	PICKUP	FL41	Gas	4/14/2025
2158	44118	46.9%	GAS SERVICE TRUCK	FL44	Gas	9/5/2025
2159	22118	46.9%	PICKUP	FL22	Gas	9/12/2025
2160	28607	46.9%	PICKUP	FL28	Common	9/17/2025
2161	28630	46.9%	PICKUP	FL28	Common	9/17/2025
2162	38712	46.9%	PICKUP	FL28	Electric	9/17/2025
2163	45119	46.9%	FLEET SERVICE TRUCK	FL45	Common	9/17/2025
2164	96166	46.9%	BUCKET TRUCK	FL96	Electric	9/17/2025
2165	E36067	46.9%	EXCAVATOR	FLE36	Electric	9/17/2025
2166	E36184	46.9%	EXCAVATOR	FLE36	Gas	9/17/2025
2167	86058	47.0%	FLATBED/STAKE RACK	FL86B	Gas	9/17/2025
2168	E20994	47.1%	BACKHOE	FLE20	Gas	9/17/2025
2169	20042	47.3%	PICKUP	FL22	Electric	8/27/2024
2170	96280	47.3%	BUCKET TRUCK	FL96	Electric	9/2/2025
2171	90062	47.3%	SERVICE TRUCK	FL90	Electric	9/4/2025
2172	54036	47.3%	DUMP TRUCK	FL54	Gas	9/11/2025
2173	89810	47.3%	BUCKET TRUCK	FL89	Electric	9/12/2025
2174	96069	47.3%	BUCKET TRUCK	FL96	Electric	9/12/2025
2175	06058	47.3%	SEDAN	FL06	Electric	9/16/2025
2176	27379	47.3%	PICKUP	FL27B	Gas	9/17/2025
2177	39039	47.3%	CARGO VAN	FL39	Electric	9/17/2025
2178	41040	47.3%	PICKUP	FL41	Gas	9/17/2025
2179	42010	47.3%	PICKUP	FL42B	Gas	9/17/2025
2180	44075	47.3%	GAS SERVICE TRUCK	FL44	Gas	9/17/2025
2181	44105	47.3%	GAS SERVICE TRUCK	FL44	Gas	9/17/2025
2182	45025	47.3%	FLEET SERVICE TRUCK	FL45	Common	9/17/2025
2183	77161	47.3%	DIGGER DERRICK	FL77	Electric	9/17/2025
2184	89155	47.3%	BUCKET TRUCK	FL89	Electric	9/17/2025
2185	E42807	47.3%	EXCAVATOR	FLE36	Electric	9/17/2025
2186	E79847	47.4%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
2187	06082	47.5%	SEDAN	FL06	Gas	10/15/2024
2188	68144	47.6%	VAN	FL68	Gas	9/17/2025
2189	E79805	47.6%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
2190	23394	47.7%	VAN	FL23	Gas	8/21/2024
2191	22253	47.7%	PICKUP	FL22	Electric	9/11/2025
2192	28198	47.7%	PICKUP	FL28	Common	9/12/2025
2193	22312	47.7%	PICKUP	FL22	Gas	9/16/2025
2194	22325	47.7%	PICKUP	FL22	Gas	9/17/2025
2195	23295	47.7%	VAN	FL23	Gas	9/17/2025
2196	26031	47.7%	PICKUP	FL26	Electric	9/17/2025
2197	44017	47.7%	GAS SERVICE TRUCK	FL44	Gas	9/17/2025
2198	59932	47.7%	FLATBED/STAKE RACK	FL59	Electric	9/16/2025
2199	64185	47.8%	SERVICE BUCKET TRUCK	FL64	Electric	1/24/2024
2200	67002	48.1%	ELECTRIC SERVICE TRUCK	FL67	Electric	8/18/2025
2201	E36739	48.1%	EXCAVATOR	FLE36	Gas	9/10/2025

	A	B	C	D	E	F
1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
2202	23125	48.1%	VAN	FL23	Gas	9/15/2025
2203	22262	48.1%	PICKUP	FL22	Electric	9/16/2025
2204	96272	48.1%	BUCKET TRUCK	FL96	Electric	9/16/2025
2205	06004	48.1%	SEDAN	FL06	Common	9/17/2025
2206	22217	48.1%	PICKUP	FL22	Common	9/17/2025
2207	23274	48.1%	VAN	FL23	Gas	9/17/2025
2208	23450	48.1%	VAN	FL23	Common	9/17/2025
2209	27031	48.1%	PICKUP	FL27B	Gas	9/17/2025
2210	28067	48.1%	PICKUP	FL28	Gas	9/17/2025
2211	64118	48.1%	SERVICE BUCKET TRUCK	FL64	Electric	9/17/2025
2212	E36154	48.1%	EXCAVATOR	FLE36	Gas	9/17/2025
2213	23314	48.1%	VAN	FL23	Gas	9/16/2025
2214	E79947	48.1%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
2215	23582	48.3%	VAN	FL23	Common	9/16/2025
2216	82808	48.3%	BUCKET TRUCK	FL82	Electric	10/22/2024
2217	22432	48.4%	PICKUP	FL22	Electric	7/8/2024
2218	59917	48.5%	FLATBED/STAKE RACK	FL59	Gas	7/2/2025
2219	28802	48.5%	PICKUP	FL28	Common	9/2/2025
2220	E36021	48.5%	EXCAVATOR	FLE36	Electric	9/3/2025
2221	22140	48.5%	PICKUP	FL22	Electric	9/4/2025
2222	38562	48.5%	PICKUP	FL28	Electric	9/11/2025
2223	44282	48.5%	GAS SERVICE TRUCK	FL44	Gas	9/15/2025
2224	20073	48.5%	PICKUP	FL22	Common	9/17/2025
2225	22053	48.5%	PICKUP	FL22	Electric	9/17/2025
2226	22195	48.5%	PICKUP	FL22	Gas	9/17/2025
2227	28723	48.5%	PICKUP	FL28	Electric	9/17/2025
2228	41064	48.5%	PICKUP	FL41	Gas	9/17/2025
2229	44268	48.5%	GAS SERVICE TRUCK	FL44	Gas	9/17/2025
2230	77099	48.5%	DIGGER DERRICK	FL77	Electric	9/17/2025
2231	82015	48.5%	BUCKET TRUCK	FL82	Electric	9/17/2025
2232	89091	48.5%	BUCKET TRUCK	FL89	Electric	9/17/2025
2233	E25857	48.6%	TOOL CARRIER	FLE25	Gas	9/15/2025
2234	E20567	48.6%	BACKHOE	FLE20	Gas	9/11/2025
2235	22494	48.8%	PICKUP	FL22	Electric	9/17/2025
2236	44155	48.9%	GAS SERVICE TRUCK	FL44	Gas	1/22/2025
2237	28055	48.9%	PICKUP	FL28	Electric	7/11/2025
2238	E82859	48.9%	FLEX TRACK	FLE82	Electric	8/29/2025
2239	22492	48.9%	PICKUP	FL22	Common	9/3/2025
2240	E36738	48.9%	EXCAVATOR	FLE36	Gas	9/12/2025
2241	07078	48.9%	SUV	FL07	Gas	9/16/2025
2242	86006	48.9%	FLATBED/STAKE RACK	FL86A	Gas	9/16/2025
2243	23000	48.9%	VAN	FL23	Gas	9/17/2025
2244	30779	48.9%	PICKUP	FL22	Gas	9/17/2025
2245	41056	48.9%	PICKUP	FL41	Gas	9/17/2025
2246	99016	48.9%	CUBE VAN	FL84	Common	9/17/2025
2247	E79837	49.0%	DIRECTIONAL DRILL	FLE79	Gas	9/9/2025
2248	90213	49.0%	SERVICE TRUCK	FL90	Gas	9/17/2025
2249	E79101	49.0%	DIRECTIONAL DRILL	FLE79	Gas	9/17/2025
2250	22322	49.1%	83	FL_22C	Electric	5/6/2024
2251	22451	49.2%	PICKUP	FL22	Gas	3/11/2025

	A	B	C	D	E	F
1	Tech ID	Utilization	Category	Vehicle Type	Usage Indicator	Last Use Date
2252	22641	49.2%	PICKUP	FL22	Electric	8/29/2025
2253	28697	49.2%	PICKUP	FL28	Electric	9/16/2025
2254	07299	49.2%	SUV	FL07	Gas	9/17/2025
2255	20004	49.2%	PICKUP	FL22	Common	9/17/2025
2256	23259	49.2%	VAN	FL23	Gas	9/17/2025
2257	26016	49.2%	PICKUP	FL26	Electric	9/17/2025
2258	44316	49.2%	GAS SERVICE TRUCK	FL44	Gas	9/17/2025
2259	77183	49.2%	DIGGER DERRICK	FL77	Electric	9/17/2025
2260	89633	49.2%	BUCKET TRUCK	FL89	Electric	9/17/2025
2261	E36097	49.2%	EXCAVATOR	FLE36	Gas	9/17/2025
2262	36043	49.6%	PICKUP	FL36	Electric	10/18/2024
2263	28131	49.6%	PICKUP	FL28	Gas	11/21/2024
2264	29178	49.6%	PICKUP	FL28	Gas	3/24/2025
2265	E36071	49.6%	EXCAVATOR	FLE36	Electric	9/8/2025
2266	37084	49.6%	SERVICE TRUCK	FL37	Gas	9/15/2025
2267	54114	49.6%	DUMP TRUCK	FL54	Gas	9/15/2025
2268	07068	49.6%	SUV	FL07	Electric	9/16/2025
2269	22039	49.6%	PICKUP	FL22	Gas	9/17/2025
2270	23091	49.6%	VAN	FL23	Common	9/17/2025
2271	28269	49.6%	PICKUP	FL28	Electric	9/17/2025
2272	28510	49.6%	PICKUP	FL28	Common	9/17/2025
2273	28620	49.6%	PICKUP	FL28	Electric	9/17/2025
2274	30629	49.6%	PICKUP	FL22	Gas	9/17/2025
2275	77185	49.6%	DIGGER DERRICK	FL77	Electric	9/17/2025
2276	90032	49.6%	SERVICE TRUCK	FL90	Electric	9/17/2025
2277	E90002	49.6%	PERSONNEL CARRIER	FLE90	Common	9/17/2025
2278	75854	49.7%	DIGGER DERRICK	FL75	Electric	9/9/2025

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Question:

230. Refer to the table of IT projects on page 52 of Ms. Baker’s direct testimony. For each project, please provide the following information in Excel.

- a. The total cost of the project by year from inception to completion for capex and O&M expense, separately. If the project is for both the electric and gas businesses, provide both the total cost and the portion applicable to the electric business.
- b. State whether the project has been approved by the highest required level for approval and identify the approval level. If the project has not been approved, provide the expected date of approval.
- c. Provide the current phase of the project (evaluation, scoping, needs assessment, etc.)
- d. State whether the project has completed the detailed requirements phase and a vendor has been selected for any software being purchased. If yes, provide a month and year and the name of the vendor.
- e. Provide the page of testimony where the responsible witness explains the projects and provides justification for undertaking it.
- f. Provide the cost/benefit analysis with formulas intact.

Response:

- a. Refer to Attachment No. U21870-AG-CE-0592-Baker_ATT_1, pages 1-5, for the total Company and electric allocation project costs by year from inception to completion for capital expenditures and investments O&M expense, for the Electric and Electric & Gas Shared projects.
- b. Refer to WP-SHB-6, lines 31 and 32, for the Catastrophic Crewing (CatCrew) Version 2.0 and Electric Geographic Information System (GIS) Design Platform Modernization projects, which were a part of the board approval of the 2025 – 2029 Long-Term Financial plan in January 2025. Refer to WP-SHB-7, lines 1 through 3, for the Integrated Energy Management Platform Optimization, Electric GIS Utility Network Transformation, and Service Restoration Artificial Intelligence projects, which were identified and business cases developed after the long-term financial plan was approved at the board meeting in January 2025. These projects have been reviewed and approved by senior leadership
- c. Refer to the table below for the current phase of each of the Electric and Electric & Gas Shared projects.

Project	Phase
Catastrophic Crewing (CatCrew) Version 2.0	Execute
Electric Geographic Information System (GIS) Design Platform Modernization	Plan

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Electric GIS Utility Network Transformation	Investment Planning
Integrated Energy Management Platform Optimization	Investment Planning
Service Restoration Artificial Intelligence	Investment Planning

- d. The Catastrophic Crewing (CatCrew) Version 2.0 has completed detailed requirements. Vendors have not been selected for any Electric and Electric & Gas Shared projects that will be purchasing software listed in the table on page 52 of my direct testimony.
- e. Refer to the table below for the page references in WP-SHB-5, for the cost/benefit analysis for each project with the financial analysis in Excel with formulas intact and Exhibit A-21 (SHB-6) for the assumptions and data.

Project	WP-SHB-5 Page Number	Exhibit A-21 (SHB-6) Page Number
Catastrophic Crewing (CatCrew) Version 2.0	40	45
Electric Geographic Information System (GIS) Design Platform Modernization	47	58
Electric GIS Utility Network Transformation	49	62
Integrated Energy Management Platform Optimization	77	101
Service Restoration Artificial Intelligence	109	144

- f. See the answer to subpart e.

Witness: Stacy H. Baker

Date: September 17, 2025

CECo Response to AG-CE-0592

MICHIGAN PUBLIC SERVICE COMMISSION						Attachment:	U21870-AG-CE-0592-Baker_ATT_1
Consumers Energy Company						Page:	2 of 5
Electric Geographic Information System (GIS) Design Platform Modernization						Witness:	SHBaker
						Date:	September 2025
Cost Category	Total Company		Electric Allocation				
	Capital	O&M	Capital	Capital (ROMAdjusted)	O&M		
2025 Projected							
Software	-	-	-	-	-		
Material	200,000	70,000	200,000	160,000	70,000		
Labor	526,511	92,913	526,511	421,209	92,913		
Contractor	425,000	75,000	425,000	340,000	75,000		
Non-Labor Overhead	36,856	6,504	36,856	29,485	6,504		
Non-Labor Other	243,248	-	243,248	194,598	-		
Total 2025 Projected	1,431,615	244,417	1,431,615	1,145,292	244,417		
2026 Projected							
Software	-	-	-	-	-		
Material	-	-	-	-	-		
Labor	724,455	127,845	724,455	579,564	127,845		
Contractor	-	-	-	-	-		
Non-Labor Overhead	50,712	8,949	50,712	40,570	8,949		
Non-Labor Other	334,698	-	334,698	267,758	-		
Total 2026 Projected	1,109,865	136,794	1,109,865	887,892	136,794		
2027 Projected							
Software	1,100,000	-	1,100,000	880,000	-		
Material	-	-	-	-	-		
Labor	724,455	127,845	724,455	579,564	127,845		
Contractor	-	-	-	-	-		
Non-Labor Overhead	50,712	8,949	50,712	40,570	8,949		
Non-Labor Other	334,698	-	334,698	267,758	-		
Total 2027 Projected	2,209,865	136,794	2,209,865	1,767,892	136,794		
2028 Projected							
Software	-	-	-	-	-		
Material	-	-	-	-	-		
Labor	724,455	127,845	724,455	579,564	127,845		
Contractor	-	-	-	-	-		
Non-Labor Overhead	50,712	8,949	50,712	40,569	8,949		
Non-Labor Other	334,698	-	334,698	267,759	-		
Total 2028 Projected	1,109,865	136,794	1,109,865	887,892	136,794		
2029 Projected							
Software	-	-	-	-	-		
Material	-	-	-	-	-		
Labor	181,114	31,962	181,114	144,891	31,962		
Contractor	-	-	-	-	-		
Non-Labor Overhead	12,678	2,237	12,678	10,142	2,237		
Non-Labor Other	83,675	-	83,675	66,940	-		
Total 2029 Projected	277,467	34,199	277,467	221,973	34,199		
Total Project Projected							
Software	1,100,000	-	1,100,000	880,000	-		
Material	200,000	70,000	200,000	160,000	70,000		
Labor	2,880,990	508,410	2,880,990	2,304,792	508,410		
Contractor	425,000	75,000	425,000	340,000	75,000		
Non-Labor Overhead	201,670	35,588	201,670	161,336	35,588		
Non-Labor Other	1,331,017	-	1,331,017	1,064,814	-		
Total Project Projected	6,138,677	688,998	6,138,677	4,910,941	688,998		

MICHIGAN PUBLIC SERVICE COMMISSION		Attachment:	U21870-AG-CE-0592-Baker_ATT_1
Consumers Energy Company		Page:	3 of 5
Electric GIS Utility Network Transformation		Witness:	SHBaker
		Date:	September 2025

Cost Category	Total Company		Electric Allocation		
	Capital	O&M	Capital	Capital (ROM Adjusted)	O&M
2027 Projected					
Software	1,800,000	360,000	1,800,000	1,440,000	360,000
Material	-	-	-	-	-
Labor	235,106	305,713	235,106	188,085	305,713
Contractor	1,702,591	758,458	1,702,591	1,362,073	758,458
Non-Labor Overhead	-	74,492	-	-	74,492
Non-Labor Other	234,978	61,193	234,978	187,982	61,193
Total 2027 Projected	3,972,675	1,559,856	3,972,675	3,178,140	1,559,856
2028 Projected					
Software	45,000	50,000	45,000	36,000	50,000
Material	-	-	-	-	-
Labor	1,319,367	285,446	1,319,367	1,055,494	285,446
Contractor	6,507,208	910,112	6,507,208	5,205,766	910,112
Non-Labor Overhead	-	83,689	-	-	83,689
Non-Labor Other	1,560,855	167,389	1,560,855	1,248,684	167,389
Total 2028 Projected	9,432,430	1,496,636	9,432,430	7,545,944	1,496,636
2029 Projected					
Software	22,500	47,500	22,500	18,000	47,500
Material	-	-	-	-	-
Labor	894,973	1,240,000	894,973	715,978	1,240,000
Contractor	4,045,908	539,364	4,045,908	3,236,726	539,364
Non-Labor Overhead	-	124,555	-	-	124,555
Non-Labor Other	1,010,186	-	1,010,186	808,149	-
Total 2029 Projected	5,973,567	1,951,419	5,973,567	4,778,854	1,951,419
Total Project Projected					
Software	1,867,500	457,500	1,867,500	1,494,000	457,500
Material	-	-	-	-	-
Labor	2,449,446	1,831,159	2,449,446	1,959,557	1,831,159
Contractor	12,255,707	2,207,934	12,255,707	9,804,566	2,207,934
Non-Labor Overhead	-	282,736	-	-	282,736
Non-Labor Other	2,806,019	228,582	2,806,019	2,244,815	228,582
Total Project Projected	19,378,672	5,007,911	19,378,672	15,502,938	5,007,911

MICHIGAN PUBLIC SERVICE COMMISSION			Attachment:	U21870-AG-CE-0592-Baker_ATT_1	
<u>Consumers Energy Company</u>			Page:	4 of 5	
Integrated Energy Management Platform Optimization			Witness:	SHBaker	
			Date:	September 2025	
Cost Category	Total Company		Electric Allocation		
	Capital	O&M	Capital	Capital (ROMAdjusted)	O&M
2027 Projected					
Software	3,357,911	-	3,357,911	2,686,329	-
Material	-	-	-	-	-
Labor	376,740	202,860	376,740	301,392	202,860
Contractor	45,000	1,303,000	45,000	36,000	1,303,000
Non-Labor Overhead	32,560	-	32,560	26,048	-
Non-Labor Other	217,685	17,532	217,685	174,148	17,532
Total 2027 Projected	4,029,896	1,523,392	4,029,896	3,223,917	1,523,392
2028 Projected					
Software	-	-	-	-	-
Material	-	-	-	-	-
Labor	88,400	47,600	88,400	70,720	47,600
Contractor	-	-	-	-	-
Non-Labor Overhead	-	-	-	-	-
Non-Labor Other	-	-	-	-	-
Total 2028 Projected	88,400	47,600	88,400	70,720	47,600
Total Project Projected					
Software	3,357,911	-	3,357,911	2,686,329	-
Material	-	-	-	-	-
Labor	465,140	250,460	465,140	372,112	250,460
Contractor	45,000	1,303,000	45,000	36,000	1,303,000
Non-Labor Overhead	32,560	-	32,560	26,048	-
Non-Labor Other	217,685	17,532	217,685	174,148	17,532
Total Project Projected	4,118,296	1,570,992	4,118,296	3,294,637	1,570,992

MICHIGAN PUBLIC SERVICE COMMISSION			Attachment:	U21870-AG-CE-0592-Baker_ATT_1	
<u>Consumers Energy Company</u>			Page:	5 of 5	
Service Restoration Artificial Intelligence			Witness:	SHBaker	
			Date:	September 2025	
Cost Category	Total Company		Electric Allocation		
	Capital	O&M	Capital	Capital (ROMAdjusted)	O&M
2026 Projected					
Software	-	-	-	-	-
Material	-	-	-	-	-
Labor	576,904	102,977	576,904	461,523	102,977
Contractor	-	-	-	-	-
Non-Labor Overhead	-	-	-	-	-
Non-Labor Other	423,470	11,130	423,470	338,776	11,130
Total 2026 Projected	1,000,374	114,107	1,000,374	800,299	114,107
2027 Projected					
Software	-	-	-	-	-
Material	-	-	-	-	-
Labor	324,096	56,023	324,096	259,277	56,023
Contractor	-	-	-	-	-
Non-Labor Overhead	-	-	-	-	-
Non-Labor Other	152,325	-	152,325	121,860	-
Total 2027 Projected	476,421	56,023	476,421	381,137	56,023
Total Project Projected					
Software	-	-	-	-	-
Material	-	-	-	-	-
Labor	901,000	159,000	901,000	720,800	159,000
Contractor	-	-	-	-	-
Non-Labor Overhead	-	-	-	-	-
Non-Labor Other	575,795	11,130	575,795	460,636	11,130
Total Project Projected	1,476,795	170,130	1,476,795	1,181,436	170,130

IT Premature Projects - Group 1 and 2: Bridge Period and Projected Test Year Capex and O&M Expense Disallowances

(\$000)		ROM Capital Expenditures					
Line #	IT Premature Projects - Group 1 ¹	2025	2026	2027	Bridge Period	Projected Test Year ²	Projected Test Year ²
1	Electric Geographic Information System (GIS) Design Platform Modernization	\$ 1,145	\$ 888	\$ 1,767	\$ 1,181	\$ 281	\$ 137
2	Electric GIS Utility Network Transformation			\$ 3,178		\$ 1,050	\$ 520
3	Integrated Energy Management Platform Optimization			\$ 3,224		\$ 1,075	\$ 508
4	Service Restoration Artificial Intelligence		\$ 800	\$ 381	\$ 267	\$ 661	\$ 95
5	Total				\$ 1,448	\$ 3,067	\$ 1,260

¹ Exhibit AG-27.

² Stacey Baker Testimony.

(\$000)		ROM Capital Expenditures					
Line #	IT Premature Projects - Group 2 ³	2025	2026	2027	Bridge Period	Projected Test Year ⁴	Projected Test Year ⁴
6	Critical Substation Upgrade		\$ 2,364	\$ 3,667	\$ 788	\$ 3,136	\$ 397
7	Data & Analytics Platform Rationalization	\$ 1,718	\$ 3,326		\$ 2,827	\$ 2,512	\$ 539
8	OT Datacenter Migration		\$ 3,773	\$ 479	\$ 1,258	\$ 2,675	\$ 570
9	Forward Web Proxy Services		\$ 2,458		\$ 819	\$ 1,639	\$ 202
10	Physical Access Management and Alarm Response		\$ 1,773	\$ 851	\$ 591	\$ 1,466	\$ 168
11	Total				\$ 6,283	\$ 11,428	\$ 1,876

³ Exhibit AG-29.

⁴ Stacey Baker Testimony.

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Question:

232. Refer to pages 79 and 80 of Ms. Baker’s direct testimony pertaining to the Critical Substation Upgrade project. Please:

- a. Provide the total cost of the project by year from inception to completion for capex and O&M expense, separately. If the project is for both the electric and gas businesses, provide both the total cost and the portion applicable to the electric business.
- b. Identify by major components what the money will be spent on each year.
- c. Identify the number of stations being upgraded each year.
- d. Provide the average cost per station.
- e. Explain and show how the cost per station or total cost for the year were developed and on what basis.
- f. Explain whether the Company is installing all new equipment at each station for the first time or if it is replacing older equipment. If replacing older equipment, explain whether the older equipment is still functioning or non-operative.
- g. Provide the current phase of the project (evaluation, scoping, needs assessment, etc.).
- h. State whether the project has been approved by the highest required level for approval and identify the approval level. If the project has not been approved, provide the expected date of approval.

Response:

- a. Refer to the table below for the total Company and electric allocation projected capital expenditures and investments O&M expense for the Critical Substation Upgrade project.

Cost Category	Total Company		Electric Allocation		
	Capital	O&M	Capital	Capital (ROM Adjusted)	O&M
2026 Projected					
Software	\$0	\$0	\$0	\$0	\$0
Material	\$312,500	\$0	\$312,500	\$250,000	\$0
Labor	\$500,000	\$250,000	\$500,000	\$400,000	\$250,000
Contractor	\$1,562,500	\$0	\$1,562,500	\$1,250,000	\$0
Non-Labor Overhead	\$580,500	\$0	\$580,500	\$464,400	\$0
Non-Labor Other	\$0	\$100,000	\$0	\$0	\$100,000
Total 2026 Projected	\$2,955,500	\$350,000	\$2,955,500	\$2,364,400	\$350,000
2027 Projected					
Software	\$0	\$0	\$0	\$0	\$0
Material	\$312,500	\$0	\$312,500	\$250,000	\$0

Labor	\$1,000,000	\$350,000	\$1,000,000	\$800,000	\$350,000
Contractor	\$2,562,500	\$0	\$2,562,500	\$2,050,000	\$0
Non-Labor Overhead	\$0	\$140,000	\$0	\$0	\$140,000
Non-Labor Other	\$708,500	\$0	\$708,500	\$566,800	\$0
Total 2027 Projected	\$4,583,500	\$490,000	\$4,583,500	\$3,666,800	\$490,000
2028 Projected					
Software	\$0	\$0	\$0	\$0	\$0
Material	\$312,500	\$0	\$312,500	\$250,000	\$0
Labor	\$1,000,000	\$350,000	\$1,000,000	\$800,000	\$350,000
Contractor	\$2,562,500	\$0	\$2,562,500	\$2,050,000	\$0
Non-Labor Overhead	\$0	\$140,000	\$0	\$0	\$140,000
Non-Labor Other	\$708,500	\$0	\$708,500	\$566,800	\$0
Total 2028 Projected	\$4,583,500	\$490,000	\$4,583,500	\$3,666,800	\$490,000
Total Project Projected					
Software	\$0	\$0	\$0	\$0	\$0
Material	\$937,500	\$0	\$937,500	\$750,000	\$0
Labor	\$2,500,000	\$950,000	\$2,500,000	\$2,000,000	\$950,000
Contractor	\$6,687,500	\$0	\$6,687,500	\$5,350,000	\$0
Non-Labor Overhead	\$580,500	\$280,000	\$580,500	\$464,400	\$280,000
Non-Labor Other	\$1,417,000	\$100,000	\$1,417,000	\$1,133,600	\$100,000
Total Project Projected	\$12,122,500	\$1,330,000	\$12,122,500	\$9,698,000	\$1,330,000

- b. Refer to Audit Response No. U21870-SA-CE-038, part c, for a breakdown explaining the work planned to be completed each year.
- c. The Company plans to upgrade the 16 most critical substations. Refer to the table below for the number of critical substations planned to be upgraded each year.

2026	2027	2028	Total
4	6	6	16

- d. The average cost per critical substation is \$757,000, which is based on a vendor quote for contractor costs from 2022 of approximately \$500,000 per substation.
- e. Refer to Audit Response No. U21870-SA-CE-038, part a, for how the total costs for the project were estimated.
- f. The perimeter of the Company's substations is enclosed with fencing topped with barbed wire, and the gates are secured with padlocks and chains. No other security measures are in place. The Company plans to install new security measures at each business-critical substation that were not previously in place.

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- g. The Critical Substation Upgrade project is in Investment Planning phase.
- h. Refer to WP-SHB-6, line 123, for the Critical Substation Upgrade project, which was part of the board approval of the 2025 – 2029 Long-Term Financial plan in January 2025.

Witness: Stacy H. Baker

Date: September 17, 2025

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Question:

233. Refer to pages 97 and 99 of Ms. Baker's direct testimony pertaining to the Data & Analytics Platform Rationalization project. Please:

- a. Provide the total cost of the project by year from inception to completion for capex and O&M expense, separately. If the project is for both the electric and gas businesses, provide both the total cost and the portion applicable to the electric business.
- b. It appears that the Company is proposing to purchase new software to perform data analytics on its IT systems. Please confirm that or explain.
- c. Identify by major component what the money will be spent on each year.
- d. State whether the project has been approved by the highest required level for approval and identify the approval level. If the project has not been approved, provide the expected date of approval.
- e. Provide the current phase of the project (evaluation, scoping, needs assessment, etc.)
- f. State whether the project has completed the detailed requirements phase and a vendor has been selected for any software being purchased. If yes, provide a month and year and the name of the vendor.
- g. Provide the cost/benefit analysis with formulas intact.
- h. Explain why the current software or system is being retired, its age, and whether it is still functioning and useful.

Response:

- a. Refer to Attachment No. U21870-AG-CE-0595_Baker_ATT_1 for the total Company and electric allocation costs by year from inception to completion for capital expenditures and investments O&M expense for the Data & Analytics Platform Rationalization project.
- b. The Company is not planning to purchase new software for Data & Analytics Platform Rationalization project. The project will build new data pipelines and enable features in the existing solution to bring data directly from source systems into the data lake. The costs categorized as software costs for this project are for Azure cloud services.
- c. Refer to part a response.
- d. Refer to WP-SHB-6, line 80, for Data & Analytics Platform Rationalization project, which was part of the board approval of the 2025 – 2029 Long-Term Financial plan in January 2025.
- e. The Data & Analytics Platform Rationalization project is in the Planning phase.

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- f. The Company has completed high-level planning for the overall project and detailed planning for the first release. The Company is not purchasing any new software. Internal teams are building the solution in-house, supported by staff-augmented resources.
- g. Refer to WP-SHB-5, Page 47, for the cost/benefit analysis for the project with the financial analysis in Excel with formulas intact. Refer to Exhibit A-21 (SHB-6), page 51, for assumptions and data.
- h. The Company is retiring its legacy data analytics technologies including SAP BW, SAP BOBJ, Native HANA, the BW Portal, and SAP BODS, due to their obsolescence. Most of these systems were originally implemented as part of the Company's initial SAP implementation in 2008. Continuing to rely on outdated technologies has, and will continue, to result in fragmented reporting environments that are less useful and increased maintenance burdens.

Witness: Stacy H. Baker

Date: September 17, 2025

MICHIGAN PUBLIC SERVICE COMMISSION		Attachment: U21870-AG-CE-0595_Baker_ATT_1			
<u>Consumers Energy Company</u>		Witness: SHBaker			
Data & Analytics Platform Rationalization		Date: September 2025			
Cost Category	Total Company		Electric Allocation		
	Capital	O&M	Capital	Capital (ROM Adjusted)	O&M
2025 Projected					
Software	100,000	-	68,570	54,856	-
Material	-	-	-	-	-
Labor	1,000,000	100,000	685,700	548,560	61,981
Contractor Costs	1,500,000	250,000	1,028,550	822,840	154,951
Non-Labor Overhead	70,000	7,000	47,999	38,399	4,339
Non-Labor Other	462,000	-	316,793	253,435	-
Total 2025 Projected	3,132,000	357,000	2,147,612	1,718,090	221,270
2026 Projected					
Software	806,200	-	552,811	-	-
Material	-	-	-	-	-
Labor	2,000,000	200,000	1,371,400	1,097,120	123,961
Contractor Costs	3,000,000	1,089,500	2,057,100	1,645,680	675,278
Non-Labor Overhead	-	-	-	-	-
Non-Labor Other	1,064,000	14,000	729,585	583,668	8,677
Total 2026	6,870,200	1,303,500	4,710,896	3,326,468	807,916
Total Project Projected					
Software	906,200	-	621,381	54,856	-
Material	-	-	-	-	-
Labor	3,000,000	300,000	2,057,100	1,645,680	185,942
Contractor Costs	4,500,000	1,339,500	3,085,650	2,468,520	830,229
Non-Labor Overhead	70,000	7,000	47,999	38,399	4,339
Non-Labor Other	1,526,000	14,000	1,046,378	837,103	8,677
Total Project Projected	10,002,200	1,660,500	6,858,509	5,044,558	1,029,186

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Question:

234. Refer to page 100 of Ms. Baker's direct testimony pertaining to the OT Datacenter Migration project. Please:

- a. Provide the total cost of the project by year from inception to completion for capex and O&M expense, separately. If the project is for both the electric and gas businesses, provide both the total cost and the portion applicable to the electric business.
- b. Provide the current phase of the project (evaluation, scoping, needs assessment, etc.)
- c. Provide the cost/benefit analysis with formulas intact.
- d. Confirm that the responses provided to discovery requests U-21806-AG-CE-0631 and 0932 are still valid or provide updated responses.

Response:

- a. Refer to Attachment No. U21870-AG-CE-0596-Baker_ATT_1 for the total Company and electric allocation project costs by year from inception to completion for capital expenditures and investments O&M expense, for the OT Datacenter Migration project.
- b. The OT Datacenter Migration project is in Investment Planning phase.
- c. Refer to WP-SHB-5, page 85, for the cost/benefit analysis for the project with the financial analysis in Excel with formulas intact. Refer to Exhibit A-21 (SHB-6), page 114, for the assumptions and data.
- d. Refer to Discovery Response No. U21870-AG-CE-0602, part c, for an update to Discovery Response No. U21806-AG-CE-0631 related to the Physical Access Management and Alarm Response project. Discovery Response No. U21806-AG-CE-0932 for the OT Datacenter Migration project is still valid.

Witness: Stacy H. Baker

Date: September 17, 2025

MICHIGAN PUBLIC SERVICE COMMISSION			Attachment:	U21870-AG-CE-0596_Baker_ATT_1	
<u>Consumers Energy Company</u>			Witness:	SHBaker	
Operational Technology (OT) Datacenter Migration			Date:	September 2025	
Cost Category	Total Company		Electric Allocation		
	Capital	O&M	Capital	Capital (ROM Adjusted)	O&M
2026 Projected					
Software	500,000	-	342,850	274,280	-
Material	5,010,000	-	3,435,357	2,748,286	-
Labor	300,000	300,000	205,710	164,568	185,942
Contractor	500,000	545,000	342,850	274,280	337,794
Non-Labor Overhead	56,000	59,150	38,399	30,719	36,661
Non-Labor Other	511,220	-	350,544	280,435	-
Total 2026 Projected	6,877,220	904,150	4,715,710	3,772,568	560,397
2027 Projected					
Software	-	-	-	-	-
Material	-	-	-	-	-
Labor	200,000	350,000	137,140	109,712	216,932
Contractor	500,000	540,000	342,850	274,280	334,695
Non-Labor Overhead	49,000	62,300	33,599	26,879	38,614
Non-Labor Other	123,400	-	84,615	67,692	-
Total 2027 Projected	872,400	952,300	598,205	478,564	590,240
Total Project Projected					
Software	500,000	-	342,850	274,280	-
Material	5,010,000	-	3,435,357	2,748,286	-
Labor	500,000	650,000	342,850	274,280	402,873
Contractor	1,000,000	1,085,000	685,700	548,560	672,488
Non-Labor Overhead	105,000	121,450	71,999	57,599	75,275
Non-Labor Other	634,620	-	435,159	348,127	-
Total Project Projected	7,749,620	1,856,450	5,313,914	4,251,132	1,150,637

CECo Response to AG-CE-0601

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Question:

239. Refer to pages 114 and 115 of Ms. Baker’s direct testimony on the Forward Web Proxy Services project. Please:

- a. Provide the total cost of the project by year from inception to completion for capex and O&M expense, separately. If the project is for both the electric and gas businesses, provide both the total cost and the portion applicable to the electric business.
- b. Provide the current phase of the project (evaluation, scoping, needs assessment, etc.).
- c. State whether the project has completed the detailed requirements phase and a vendor has been selected for any software being purchased. If yes, provide a month and year and the name of the vendor.
- d. Confirm that the responses provided to discovery requests U-21806-AG-CE-0630 are still valid or provide updated responses.

Response:

- a. Refer to the table below for the total Company and the electric allocation projected capital expenditures and investments O&M expense for the Forward Web Proxy Services project.

Cost Category	Total Company		Electric Allocation		
	Capital	O&M	Capital	Capital (ROM Adjusted)	O&M
2026 Projected					
Software	3,987,770	440,340	2,734,414	2,187,531	272,925
Material	-	-	-	-	-
Labor	50,000	8,500	34,285	27,428	5,268
Contractor Costs	160,000	32,000	109,712	87,770	19,834
Non-Labor Overhead	-	-	-	-	-
Non-Labor Other	283,762	2,835	194,576	155,660	1,757
Total 2026 Projected	4,481,532	483,675	3,072,987	2,458,389	299,784
2027 Projected					
Software	-	-	-	-	-
Material	-	-	-	-	-
Labor	-	8,500	-	-	5,268
Contractor Costs	-	-	-	-	-
Non-Labor Overhead	-	-	-	-	-
Non-Labor Other	-	595	-	-	369
Total 2027 Projected	-	9,095	-	-	5,637

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Total Project Projected					
Software	3,987,770	440,340	2,734,414	2,187,531	272,925
Material	-	-	-	-	-
Labor	50,000	17,000	34,285	27,428	10,536
Contractor Costs	160,000	32,000	109,712	87,770	19,834
Non-Labor Overhead	-	-	-	-	-
Non-Labor Other	283,762	3,430	194,576	155,660	2,126
Total Project Projected	4,481,532	492,770	3,072,987	2,458,389	305,421

- b. The project is in Investment Planning phase.
- c. The Company has not completed detailed requirements for this project. A vendor has not been selected for this project. The Company plans to conduct a Request for Proposal in late 2025.
- d. The Company confirms that the responses provided in Discovery Response No U-21806-AG-CE-0630 are still valid.

Witness: Stacy H. Baker

Date: September 17, 2025

CECo Response to AG-CE-0602

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Question:

240. Refer to pages 115-117 of Ms. Baker’s direct testimony on the Physical Access Management and Alarm Response project. Please:

- a. Provide the total cost of the project by year from inception to completion for capex and O&M expense, separately. If the project is for both the electric and gas businesses, provide both the total cost and the portion applicable to the electric business.
- b. Provide the current phase of the project (evaluation, scoping, needs assessment, etc.).
- c. Confirm that the responses provided to discovery requests U-21806-AG-CE-0631 and 0933 are still valid or provide updated responses.

Response:

- a. Refer to the table below for the total Company and electric allocation projected capital expenditures and investments O&M expense for the Physical Access Management and Alarm Response project.

Cost Category	Total Company		Electric Allocation		
	Capital	O&M	Capital	Capital (ROM Adjusted)	O&M
2026 Projected					
Software	1,507,500	-	1,033,693	826,954	-
Material	1,130,000	-	774,841	619,873	-
Labor	112,500	306,500	77,141	1,713	189,970
Contractor	225,000	-	154,283	123,426	-
Non-Labor Overhead	-	-	-	-	-
Non-Labor Other	258,655	21,455	177,360	141,888	13,298
Total 2026 Projected	3,233,655	327,955	2,217,318	1,773,854	203,268
2027 Projected					
Software	90,000	15,300	61,713	49,370	9,483
Material	1,125,000	-	771,413	617,130	-
Labor	67,500	133,200	46,285	37,028	82,558
Contractor	135,000	-	92,570	74,056	-
Non-Labor Overhead	-	-	-	-	-
Non-Labor Other	133,245	9,324	91,366	73,093	5,779
Total 2027 Projected	1,550,745	157,824	1,063,347	850,677	97,820
2028 Projected					
Software	90,000	15,300	61,713	49,370	9,483
Material	1,125,000	-	771,413	617,130	-
Labor	67,500	133,200	46,285	37,028	82,558
Contractor	135,000	-	92,570	74,056	-
Non-Labor Overhead	-	-	-	-	-
Non-Labor Other	133,245	9,324	91,366	73,093	5,779
Total 2028 Projected	1,550,745	157,824	1,063,347	850,677	97,820

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Total Project Projected					
Software	1,687,500	30,600	1,157,119	925,694	18,966
Material	3,380,000	-	2,317,667	1,854,133	-
Labor	247,500	72,900	169,711	135,769	355,086
Contractor	495,000	-	339,423	271,538	-
Non-Labor Overhead	-	-	-	-	-
Non-Labor Other	525,145	40,103	360,092	288,074	24,856
Total Project Projected	6,335,145	643,603	4,344,012	3,475,208	398,908

- b. The project is currently in the Investment Planning phase.
- c. Discovery Response No. U21806-AG-CE-0931 for the Physical Access Management and Alarm Response project is still valid. Discovery Response No. U21806-AG-CE-0631 is still valid with the following additional operational issues that have occurred, which are in addition to those already provided in part c of the response.

Line No.	Number	Short description	Created	Duration
15	433000	Unplanned AIU outage	5/7/2025	20 min
16	445964	Unplanned AIU Outage	7/31/2025	1 hrs 24 min
17	448219	Unplanned AIU Outage, system degraded due to multiple SCP communication failures	8/20/2025	2 hrs 17 min

Witness: Stacy H. Baker
Date: September 17, 2025

Exhibit AG-30
(SAP S-4 HANA Project)

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U21870-AG-CE-0603
Page 1 of 1

Question:

241. Refer to page 5 of Exhibit A-22 on ARP-Field Device Asset Management. Please:

- a. Provide the same information for each year 2021-2023 in Excel.
- b. Explain what the amounts on lines 4 and 17 are for and why there are no related units.
- c. Explain why there is a significant increase in quantities and dollars on lines 1, 2, and 7 for 2025, 2026, and 2027 in comparison to 2024.

Response:

- a. Refer to Attachment No. U21870-AG-CE-0603_Baker_ATT_1 for units and average unit costs for 2021-2023 in Excel for the ARP-Field Device Asset Management project.
- b. The amounts in Exhibit A-22 (SHB-7), page 5, line 4, are the software, labor, contractor, and overhead and other costs to complete the work for field device replacements and new purchases and are not based on units and unit costs. Refer to my direct testimony page 65, lines 7-8, for the explanation of the basis for the new purchases of field devices, which are projected based on historical costs and not based on units.
- c. The number of devices projected to be refreshed each year is based on a four-year refresh cycle of existing devices.

Witness: Stacy H. Baker
Date: September 17, 2025

CECo Response to AG-CE-0603

MICHIGAN PUBLIC SERVICE COMMISSION Consumers Energy Company For actual year 2021, 2022, and 2023. For the the number of units/devices in place at the end of each year 2021, 2022, and 2023						Attachment: U21870-AG-CE-0603_Baker_ATT_1
						Witness: SHBaker
						Date: September 2025
ARP-Field Device Asset Mgmt						
Line No.	(a)	(b)	(c)	(d)	(e)	(f)
	Units	Avg. Unit Cost	Total 2021 Units	Total 2021 Dollars	2021 Electric Allocation Dollars	Reference
1	Field Devices CF33 w/acce	\$4,201	235	\$987,155	\$690,910	U-21224, A-173 (JMW-8), page 2, line 6
2	Field Devices CF33 w/acce	\$3,831	57	\$218,348	\$152,821	U-21224, A-173 (JMW-8), page 2, line 7
3	CF33 accessories			\$111,888	\$78,311	U-21224, A-173 (JMW-8), page 2, line 8
4	Software, labor, contractor and overhead and other costs			\$8,057	\$5,639	U-21224, A-173 (JMW-8), page 2, line 9
5	Total Electric Allocation			\$1,325,448	\$927,681	U-21224, A-173 (JMW-8), page 2, line 10
	Units	Avg. Unit Cost	Total 2022 Units	Total 2022 Dollars	2022 Electric Allocation Dollars	Reference
6	Field Devices CF33 w/acce	\$4,236	432	\$1,829,952	\$1,280,783	U-21389, A-182 (HNW-8), page 2, line 4
7	Field Devices CF33 w/acce	\$3,970	0	\$0	\$0	U-21389, A-182 (HNW-8), page 2, line 5
8	Accessories			\$572,589	\$400,755	U-21389, A-182 (HNW-8), page 2, line 6
9	Software, labor, contractor and overhead and other costs			(\$5,175)	(\$3,622)	U-21389, A-182 (HNW-8), page 2, line 7
10	Total Electric Allocation			\$2,397,366	\$1,677,916	U-21389, A-182 (HNW-8), page 2, line 8
	Units	Avg. Unit Cost	Total 2023 Units	Total 2023 Dollars	2023 Electric Allocation Dollars	Reference
	Replacements					
11	CF33 accessories	\$10,655	1	\$10,655	\$7,237	U-21585, A-90 (SK-8), Page 2, line 8
12	CF33 accessories	\$1,064	0	\$0	\$0	U-21585, A-90 (SK-8), Page 2, line 9
13	Field Devices CF33 w/acce	\$4,474	524	\$2,344,418	\$1,592,329	U-21585, A-90 (SK-8), Page 2, line 10
14	Field Devices CF33 w/acce	\$4,755	0	\$0	\$0	U-21585, A-90 (SK-8), Page 2, line 11
15	Field Devices CF55 w/acces	\$3,777	0	\$0	\$0	U-21585, A-90 (SK-8), Page 2, line 12
16	Field Devices Getac A140	\$4,718	191	\$901,149	\$612,061	U-21585, A-90 (SK-8), Page 2, line 13
17	Field Devices Getac A140	\$4,359	0	\$0	\$0	U-21585, A-90 (SK-8), Page 2, line 14
	New Purchases					
18	Field Devices CF33	\$3,804	0	\$0	\$0	U-21585, A-90 (SK-8), Page 2, line 15
19	Field Devices CF55	\$2,659	0	\$0	\$0	U-21585, A-90 (SK-8), Page 2, line 16
20	Field Devices Getac A140	\$4,117	0	\$0	\$0	U-21585, A-90 (SK-8), Page 2, line 17
21	Accessories			\$0	\$0	U-21585, A-90 (SK-8), Page 2, line 18
22	Software, labor, contractor and overhead and other costs			\$17,618	\$11,966	U-21585, A-90 (SK-8), Page 2, line 19
23	Total Electric Allocation			\$3,273,840	\$2,223,592	U-21585, A-90 (SK-8), Page 2, line 20

Exhibit AG-32

(Capital Expenditures and Rate Base
Reductions)

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**MICHIGAN PUBLIC SERVICE COMMISSION
Consumers Energy - Electric Rate Case**

**Case No. U-21870
Exhibit AG-33
September 30, 2025
Page 1 of 1**

Working Capital - Summary

<u>Line</u>	<u>Description</u> (a)	<u>Millions Of Dollars</u> (b)	<u>Note or Ref.</u> (c)
1	Test Year Working Capital Per Company	\$ 2,125.9	1
<u>Attorney General Changes</u>			
2	Cash Balance	(41.4)	Exhibit AG-34
3	Accrued Taxes	(30.0)	2
4	SAP S/4 HANA Cloud Computing Costs Deferral	(2.6)	3
5	Total Change (Sum of L2 to L4)	\$ (74.0)	
6	AG Revised Working Capital Level (L1 + L5)	\$ 2,051.9	
7	Change in Working Capital (L6 less L1)	\$ (74.0)	

-
- 1 Per Company Exhibit A-12, Schedule B4
 - 2 Company Adjustment on Exhibit A-12, Schedule B4, column (h) reversed
 - 3 Company Adjustment on Exhibit A-12, Schedule B4, column (m) reversed

**MICHIGAN PUBLIC SERVICE COMMISSION
Consumers Energy - Electric Rate Case**

**Case No. U-21870
Exhibit AG-34
September 30, 2025
Page 1 of 1**

Working Capital - Cash

<u>Line</u>	<u>Description</u> (a)	<u>Millions of Dollars</u> (b)	<u>Notes</u> (c)
1	Cash Balance Per Company Case	\$ 50.4	Exhibit A-12, Sched. B4
2	Cash Balance For Operations - Per AG Case	<u>9.0</u>	See Note 1 Below
4	Reduction in Cash Level and Working Capital	<u>\$ 41.4</u>	

1 Historic Cash Balances - Periods Ending December
(see DR AG-CE-0456)

	<u>Total</u>	<u>Less Investments</u>	<u>Net Amount</u>
2022	\$ 20.2	\$ 7.3	\$ 12.9
2023	18.6	12.0	6.6
2024	<u>36.4</u>	<u>29.0</u>	<u>7.4</u>
3 Yr Avg.	<u>\$ 25.1</u>	<u>\$ 16.1</u>	<u>\$ 9.0</u>

MICHIGAN PUBLIC SERVICE COMMISSION
Consumers Energy - Electric Rate Case

Case No. U-21870
 Exhibit AG-35
 September 30, 2025
 Page 1 of 2

Recommended Capital Structure & Cost Rates for Test
Year Ending April 30, 2027

(Millions of Dollars)

Line	Description (a)	Capital Structure			Cost Rate** (e)	Total Cost (d) x (e) (f)	Conversion Factors*** (g)	Pre-Tax Wtd. Cost (f) x (g) (h)
		Capital Balances* (b)	% Permanent Capital (c)	% Total Capital (d)				
1	Long Term Debt	\$ 13,672.0	49.87%	42.19%	4.39%	1.85%	1.0000	1.85%
2	Preferred Stock	37	0.13%	0.11%	4.50%	0.01%	1.3381	0.01%
3	Common Equity	<u>13,709.0</u>	<u>50.00%</u>	<u>42.30%</u>	9.80%	<u>4.15%</u>	1.3381	<u>5.55%</u>
4	Total Permanent Capital	27,418.0	<u>100.00%</u>	84.61%		6.00%		7.40%
5	Short Term Debt	148.0		0.46%	4.92%	0.02%	1.0000	0.02%
6	Deferred Income Taxes	4,692.0		14.48%	0.00%	0.00%	1.0000	0.00%
7	JDITC							
8	Long Term Debt	74.0		0.23%	4.39%	0.01%	1.0000	0.01%
9	Preferred Stock	-		0.00%	4.50%	0.00%	1.3381	0.00%
10	Common Equity	<u>74.0</u>		<u>0.23%</u>	9.80%	<u>0.02%</u>	1.3381	<u>0.03%</u>
11	Total Capitalization & Cost Rates	<u>\$ 32,406.0</u>		<u>100.00%</u>		6.06%		7.47%

Notes

* All capital balances per Company Exhibit A-14, Schedule D1 except that Long-Term Debt and Common Equity set at 50%/50%

** All cost rates per Company Exhibit A-14, Schedule D1 except for Common Equity which is from Exhibit AG-36 and long-term debt which is from page 2 of this exhibit.

*** Conversion factors per Company Exhibit A-14, Schedule D1.

Cost of Long-Term Debt

(Millions of Dollars)

Line	<u>Caption or Description</u> (a)	<u>Long-Term Debt Amount</u> (b)	<u>Cost Amount</u> (c)	<u>Cost Rate</u> (d)	<u>Information Source or Comment</u> (e)
<u>Company Case</u>					
1	All Existing Long Term Debt	\$ 11,284.5	\$ 472.8	4.19%	Ex. A-14 (MRB-4), Sch. D1
2	New Issue Number 1	475.0	30.0	6.32%	Ex. A-14 (MRB-4), Sch. D1, Line 44
3	New Issue Number 2	650.0	41.1	6.32%	Ex. A-14 (MRB-4), Sch. D1, Line 45
4	New Issue Number 3	553.8	35.2	6.35%	Ex. A-14 (MRB-4), Sch. D1, Line 46
5	New Issue Number 4	501.9	31.8	<u>6.35%</u>	Ex. A-14 (MRB-4), Sch. D1, Line 47
6	Total Long-Term Debt (Amount and Cost)	<u>\$ 13,465.2</u>	<u>\$ 610.9</u>	<u>4.54%</u>	Total Long-Term Debt Cost per Company
<u>Attorney General Case</u>					
7	All Existing Long Term Debt	\$ 11,284.5	\$ 472.8	4.19%	From Line 1 above
8	New Issue Number 1	500.0	23.3	4.66%	See DR AG-CE-409
9	New Issue Number 2	625.0	32.6	5.22%	See DR AG-CE-409
10	New Issue Number 3	553.8	32.4	5.86%	Rate revised downward by 0.49% *
11	New Issue Number 4	501.9	29.4	<u>5.86%</u>	Rate revised downward by 0.49% *
12	Total Long Term Debt Cost	<u>\$ 13,465.2</u>	<u>\$ 590.5</u>	4.39%	Total Long-Term Debt Cost Rate per AG

To page 1 of this exhibit

* The build-up of the AG rate presumes a 4.40% 30 year U.S. Treasury rate (consistent with CAPM analysis rate) whereas the Company uses a 4.89% 30 year U.S. Treasury rate.

**MICHIGAN PUBLIC SERVICE COMMISSION
Consumers Energy - Electric Rate Case**

**Case No. U-21870
Exhibit AG-36
September 30, 2025
Page 1 of 1**

**Summary of Cost of Common Equity Capital Analysis
Year Ending April 30, 2027**

<u>Line</u>	<u>Description</u> (a)	<u>Relative Weighting</u> (b)	<u>Peer Group</u> (c)	<u>Note</u> (d)
1	Discounted Cash Flow (DCF) Approach	50.00%	9.57%	1
2	Capital Asset Pricing Model (CAPM) Approach	25.00%	9.98%	2
3	Equity Risk Premium Approach	25.00%	<u>9.81%</u>	3
4	Calculated Cost of Common Equity (Sum of Col. (b) x (c) for each line)		<u>9.73%</u>	
5	Cost of Common Equity Rounded for Rate Case Purposes		<u>9.80%</u>	

Note 1 See Exhibit AG-37

Note 2 See Exhibit AG-38

Note 3 See Exhibit AG-39

Capital Asset Pricing Model Application
(See Equation Below)

Line	Company (a)	Ticker (b)	Common Equity to Capital % (c)	Current Beta (B) (d)	Risk Premium (Rp) (e)	Beta x Risk Premium Col. (d) x (e) (f)	Projected 2026 Risk Free Rate (Rf) (g)	Ke or 2026 CAPM ROE for Proxy Co. Col. (e) + (f) (h)
1	Alliant Energy	LNT	41.2%	0.80	7.35%	5.88%	4.40%	10.28%
2	Ameren	AEE	40.4%	0.80	7.35%	5.88%	4.40%	10.28%
3	American Electric Power	AEP	38.6%	0.70	7.35%	5.15%	4.40%	9.55%
4	CenterPoint Energy	CNP	34.4%	0.85	7.35%	6.25%	4.40%	10.65%
5	Consolidated Edison	ED	48.0%	0.65	7.35%	4.78%	4.40%	9.18%
6	DTE Energy	DTE	33.8%	0.80	7.35%	5.88%	4.40%	10.28%
7	Evergy	EVRG	44.0%	0.75	7.35%	5.51%	4.40%	9.91%
8	IDACORP	IDA	51.3%	0.70	7.35%	5.15%	4.40%	9.55%
9	OGE Energy	OGE	47.7%	0.85	7.35%	6.25%	4.40%	10.65%
10	Portland General Electric	PGE	44.9%	0.75	7.35%	5.51%	4.40%	9.91%
11	WEC Energy	WEC	<u>39.4%</u>	<u>0.70</u>	<u>7.35%</u>	<u>5.15%</u>	<u>4.40%</u>	<u>9.55%</u>
12	Average		<u>42.2%</u>	<u>0.76</u>	<u>7.35%</u>	<u>5.58%</u>	<u>4.40%</u>	<u>9.98%</u>

Sources	Column (c)	Column (d)	Column (e)	Column (g)
	From Data included in SEC filings. See WP-AG-38B	From the Value Line Investment Survey Publications of May 9, June 6 and July 18, 2025	From AG Workpaper AG-38A	Per Bulkley Testimony, page 16, line17 based on Blue Chip Forecast..

Equation for CAPM

$$Ke = Rf + (B \times Rp)$$

Where Ke = the Cost of Common Equity; Rf = the Risk Free Rate of Return;
B = the Beta or covariance of the stocks price to overall market ; and
Rp = the Expected Risk Premium of the overall market

Electric Utility Equity Risk Premium Approach

<u>Line</u>	<u>Description</u> (a)	<u>Projected Rate</u> (b)	<u>Note</u> (c)
<u>Build-up of Common Equity Rate of Return</u>			
1	Long Term US Treasury Rate Projection	4.40%	1
2	"A" rated Corporate Spread Over Treasury Bond Rate	<u>1.16%</u>	2
3	Sub Total (Line 1 + Line 2)	5.56%	
4	Historical Spread - Utility Common Stocks over Bonds	<u>4.25%</u>	3
5	Cost of Common Equity (Line 3 + Line 4)	<u>9.81%</u>	

Notes

- 1 Rate used in AG CAPM analysis.
- 2 2024 Spread over 30 Year U.S. Treasuries per AG workpapers
- 3 Historical average per AG workpapers

Electric Rate Case Return on Equity (ROE) Rates 24 Mo. Ended June 2025)*

Line	ROEs Under 9.9%				IOE Awarded-12 M.E. Jun		Parent Company	Pub Finan'l's Avail.	Long Term Debt Issued Since Date of Rate Order
	Electric Company	Jurisdiction	Order Date		2024	2025			
1	Consolidated Edison of NY	NY	Jul. 20	2023	9.25%		Consolidated Edison	Yes	Nov 2023 \$600M (10 Yr.) at 5.5%
2	Northern Indiana P. S.	IN	Aug. 2	2023	9.80%		NIPSCO	Yes	Jun 2024 \$600M (5 Yr) at 5.2%
3	Entergy Texas	TX	Aug. 3	2023	9.57%		Entergy	Yes	May 2024 \$1.2B (30 Yr.) at 7.125%
4	Duke Energy Progress	NC	Aug. 18	2023	9.80%		Duke Energy	Yes	Sep. 2023 \$600M (10 Yr), \$750M (30 Yr.) at 5.75% & 6.10%
5	Green Mountain Power	VT	Aug. 23	2023	9.58%		Eniger	Private	
6	United Illuminating Group	CT	Aug. 25	2023	8.63%		Avangrid	Yes	Oct. 2023 \$65M 10 Yr. 4.5% (Remarketed)
7	Tucson Electric Power	AZ	Aug. 25	2023	9.55%		Fortis	Canada	Feb 2025 \$300M (30 Yr.) at 5.9%
8	Avista	ID	Aug. 31	2023	9.40%		Avista	Yes	
9	Public Service of Colorado	CO	Sep. 6	2023	9.30%		Xcel Energy	Yes	Feb 2024 \$800M (10 Yr.) at 5.5%
10	MDU Resources	MT	Sep. 21	2023	9.65%		MDU Resources	Yes	
11	Duke Energy KY	KY	Oct. 12	2023	9.75%		Duke Energy	Yes	Jun 2024 \$1.5B (10 Yr & 30 Yr) at 5.45 & 5.80
12	New York State Elec. & Gas	NY	Oct. 12	2023	9.20%		Avangrid	Yes	
13	Rochester Gas & Electric	NY	Oct. 12	2023	9.20%		Avangrid	Yes	
14	Potomac Edison	MD	Oct. 18	2023	9.50%		Exelon	Yes	Feb 2024 \$1.7B (5 Yr, 10 Yr, 30 Yr) 5.15%, 5.45%, 5.6%
15	Southwestern Public Service	NM	Oct. 19	2023	9.50%		Xcel Energy	Yes	Feb 2024 \$800M (10 Yr.) at 5.5%
16	NorthWestern Energy Group	MT	Oct. 25	2023	9.65%		NorthWestern Energy Gi	Yes	Mar 2025 \$400M (5 Yr) 5.07%
17	Madison Gas & Electric	WI	Nov. 3	2023	9.70%		MGE Energy	Yes	Oct 2024 \$50M (10 & 30 Yr.) at 5.3% and 5.59%
18	Public Service of Oklahoma	OK	Nov. 3	2023	9.30%		American Electric Power	Yes	Jun 2024 \$1.0B (30 Yr.) 7%
19	Northern States Power	WI	Nov. 9	2023	9.80%		Xcel Energy	Yes	Feb 2024 \$800M (10 Yr.) at 5.5%
20	Wisconsin Power & Light	WI	Nov. 9	2023	9.80%		Alliant Energy	Yes	Mar 2024 \$300M (10 Yr) Variable
21	Atlantic City Electric	NJ	Nov. 17	2023	9.60%		Exelon	Yes	Feb 2024 \$1.7B (5 Yr, 10 Yr, 30 Yr) 5.15%, 5.45%, 5.6%
22	PacifiCorp	WY	Nov. 28	2023	9.35%		Berkshire Hathaway	Yes	Mar 2025 \$850M (30 Yr.)7.375%
23	Empire District Electric	AR	Dec. 7	2023	9.70%		Algonquin Power & Utili	Canada	
24	Ameren Illinois	IL	Dec. 14	2023	8.72%		Ameren	Yes	
25	Baltimore Gas & Electric	MD	Dec. 14	2023	9.50%		Exelon	Yes	Feb 2024 \$1.7B (5 Yr, 10 Yr, 30 Yr) 5.15%, 5.45%, 5.6%
26	Commonwealth Edison	IL	Dec. 14	2023	8.91%		Exelon	Yes	Feb 2024 \$1.7B (5 Yr, 10 Yr, 30 Yr) 5.15%, 5.45%, 5.6%
27	Portland General Electric	OR	Dec. 18	2023	9.50%		Portland General Electric	Yes	Mar 2025 \$310M (5, 20, 30 Yr) 5.36%, 5.72% & 5.84%
28	Nevada Power	NV	Dec. 26	2023	9.52%		Berkshire Hathaway	Yes	Mar 2025 \$850M (30 Yr.)7.375%
29	Idaho Power	ID	Dec. 28	2023	9.60%		IDACORP	Yes	Mar 2025 \$400M (30 Yr) 5.75%
30	Public Service of New Mexicc	NM	Jan. 3	2024	9.26%		TXNM Energy	Yes	
31	Kentucky Power	KY	Jan. 19	2024	9.75%		Amer. Elec. Power	Yes	Jun 2024 \$1.0B (30 Yr.) 7%
32	UNS Electric	AZ	Jan. 30	2024	9.75%		Fortis	Canada	
33	Jersey Central P & L	NJ	Feb. 14	2024	9.60%		First Energy	Yes	Dec 2024 \$700M (10 Yr) at 5.1%
34	Virginia Electric	VA	Feb. 28	2024	9.70%		Dominion Energy	Yes	
35	Arizona Public Service	AZ	Mar. 5	2024	9.55%		Pinnacle West	Yes	
36	Monongahela Power	WV	Mar. 26	2024	9.80%		First Energy	Yes	Dec 2024 \$700M (10 Yr) at 5.1%
37	Delmarva Power	DE	Apr. 18	2024	9.60%		Dominion Energy	Yes	
38	Indiana Michigan Power	IN	May. 8	2024	9.85%		Amer. Elec. Power	Yes	
39	Potomac Electric	MD	Jun. 10	2024	9.50%		Exelon	Yes	May 2025 \$200M (15 Yr) at 5.48%
40	Fitchburg G & E	MA	Jun. 28	2024	9.40%		Utilicorp	Yes	Aug 2024 \$72M (10, 30 Year) 5.54% and 5.69%
41	Average ROE				9.50%				

MICHIGAN PUBLIC SERVICE COMMISSION

Consumers Energy - Electric Rate Case

Electric Rate Case Return on Equity (ROE) Rates 24 Mo. Ended June 2025)*

Electric Rate Case Return on Equity (ROE) Rates (12 Mo. Ended June 2024 and 2025)*

Case No. U-21870

Exhibit AG-40

September 30, 2025

Page 2 of 3

Line	Electric Company	Jurisdiction & Order Date		ROEs Under 9.9%		Parent Company	Pub Finan'ls Avail.	Long Term Debt Issued Since Date of Rate Order
				2024	2025			
1	Indiana Michigan Power	IN	Jul. 2	2024	9.86%	Amer. Elec. Power	Yes	
2	Central Hudson G & E	NY	Jul. 18	2024	9.50%	Fortis	Canadian	
3	Interstate Power & Light	IA	Sep. 17	2024	9.87%	Alliant Energy	Yes	May 2025 \$600M (10 Yr.) 5.6%
4	Sierra Pacific	NV	Sep. 18	2024	9.74%	Berkshire Hathaway	Yes	Mar 2025 \$850M (30 Yr.)7.375%
5	Idaho Power	OR	Sep. 23	2024	9.50%	IDA Corp.	Yes	Mar 2025 \$400M (30 Yr) 5.75%
6	Upper Peninsula Power	MI	Sep. 26	2024	9.86%	Private	No	
7	Massachusetts Electric	MA	Sep. 30	2024	9.35%	National Grid	No	
8	AEP Texas	TX	Oct. 3	2024	9.76%	Amer. Elec. Power	Yes	
9	Public Service	NJ	Oct. 10	2024	9.60%	Public Service Enterp. Gr	Yes	
10	Upper Michigan Energy Res	MI	Oct. 16	2024	9.86%	WEC Energy	Yes	Jun 2025 \$900M (3 Yr CNV) 3.375
11	Minnesota Power	MN	Oct. 24	2024	9.78%	Allele	Yes	July 2025 \$250M (Var. to 30 Yr) Various
12	Appalachian Power	VA	Nov. 20	2024	9.75%	Amer. Elec. Power	Yes	
13	Potomac Electric	DC	Nov. 25	2024	9.50%	Exelon	Yes	
14	Oklahoma Gas & Electric	OK	Nov. 26	2024	9.50%	OGE Energy	Yes	Apr 2025 \$350M (30 Yr.) 5.8%
15	PacifiCorp	OR	Dec. 19	2024	9.50%	Berkshire Hathaway	Yes	Mar 2025 \$850M (30 Yr.)7.375%
16	Wisconsin Electric Pwr	WI	Dec. 19	2024	9.80%	WEC Energy	Yes	Jun 2025 \$900M (3 Yr CNV) 3.375
17	Wisconsin Public Service	WI	Dec. 19	2024	9.80%	WEC Energy	Yes	Jun 2025 \$900M (3 Yr CNV) 3.375
18	Avista Washington	WA	Dec. 20	2024	9.80%	Avista	Yes	
19	Portland General Electric	OR	Dec. 20	2024	9.34%	Portland General Elec HI	Yes	
20	Public Service Co of Okla.	OK	Jan. 15	2025	9.50%	Amer. Elec. Power	Yes	
21	Duke Energy	IN	Jan. 29	2025	9.75%	Duke	Yes	
22	Southern Indiana G & E	IN	Feb. 3	2025	9.80%	CenterPoint	Yes	
23	Black Hills Colorado	CO	Mar. 12	2025	9.40%	Black Hills	Yes	
24	CenterPoint Texas	TX	Mar. 13	2025	9.65%	CenterPoint	Yes	
25	Versant Power	ME	Mar. 13	2025	9.35%	EnMax of Alberta	No	
26	Orange and Rockland	NY	Mar. 20	2025	9.75%	Consolidated Edison	Yes	
27	Liberty Utilities	NH	Mar. 25	2025	9.10%	Algonquin	Canadian	
28	PacifiCorp	UT	Apr. 25	2025	9.38%	Berkshire Hathaway	Yes	
29	Public Service of New Mexicc	NM	May. 15	2025	9.45%	TXNM Energy	Yes	
30	PacifiCorp	WY	Jun. 2	2025	9.50%	Berkshire Hathaway	Yes	
31	Wind Energy	TX	Jun. 20	2025	9.60%	Private	No	
32	Northern Indiana P.S.	IN	Jun. 26	2025	9.75%	NiSource	Yes	
33	Average ROE				9.61%			

MICHIGAN PUBLIC SERVICE COMMISSION

Consumers Energy - Electric Rate Case

Case No. U-21870
 Exhibit AG-40
 September 30, 2025
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Electric Rate Case Return on Equity (ROE) Rates 24 Mo. Ended June 2025)*

Summary of All Cases (incl. ROEs at 9.9% and Above)*

State	Company /Description	Number of Companies		ROEs Awarded		Explanations & Commentary **
		12 Mo; Ended June of 2024	2025	12 Mo; Ended June of 2024	2025	
1	Average ROEs - Companies Under 9.9%	40	32	9.50%	9.61%	
2	ROEs Awarded - at 9.9% and Above					
3	California Pacific Gas & Electric	1	1	10.70%	10.28%	Wildfire Risk
4	Southern California Edison	1	1	10.75%	10.33%	Wildfire Risk
5	San Diego Gas & Electric	1	1	10.65%	10.23%	Wildfire Risk
6	PacifiCorp	1		10.00%		Wildfire Risk
	Bear Valley Electric Service		1		10.00%	Small Utility - 25k customers
7	Florida Florida Public Service		1		10.20%	Hurricane Risk
8	Duke Energy Florida		1		10.30%	Hurricane Risk
9	Tampa Electric		1		10.50%	Hurricane Risk
10	Michigan DTE Electric	1	1	9.90%	9.90%	
11	Consumers Energy	1	1	9.90%	9.90%	
12	Alaska Alaska Electric Light & Power	1		11.45%		Small Isolated Utility - 18K Customers
13	Other Jurisd. Duke Energy Carolinas	NC	1	10.10%		
14	Duke Energy South Carolina	SC	1	9.94%		
15	AES Indiana	IN	1	9.90%		Small Utility - 531K customers
	Otter Tail Power	ND	1		9.94%	Small Utility - 134k customers
16	Dominion Energy - S. Carolina	SC	1		10.10%	
17	Green Mountain Power	VT	1		9.97%	Small Utility - 275K customers
18	Virginia Electric	VA	1		9.95%	
19	Puget Sound	WA	-	1		9.90%
18	Cases at 9.9% + with ROEs Stated (Excl. Lmted. Issue Rider:	10	14	10.33%	10.11%	
19	Average of All ROEs Awarded	50	46	9.67%	9.76%	

* All ROE data from Regulatory Research Associates & excludes Limited Issue Rider cases

** Customer size information is from SEC documents and Company web sites

**MICHIGAN PUBLIC SERVICE COMMISSION
Consumers Energy - Electric Rate Case**

**Case No. U-21870
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September 30, 2025
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**ROE Awards -24 Mo. Ended June 2025
Peer Group**

		2 Yrs. Ended June 2025	
<u>Line</u>	<u>Company</u>	<u>Authorized ROE Decision*</u>	<u>Comments and Explanations</u>
	(a)	(b)	(c)
1	Alliant Energy	9.84%	Two decisions Iowa at 9.87% and Wisc at 9.80%
2	Ameren	8.72%	Ameren Illinois
3	American Electric Power	9.68%	Various**
4	CenterPoint Energy	9.72%	Two decisions: Indiana at 9.80% and Texas at 9.65%
5	Consolidated Edison	9.50%	Two NY decisions at 9.75% and 9.25%
6	DTE Energy	9.90%	Two decisions at 9.90%
7	Evergy	-	None in past two years
8	IDACORP	9.55%	Two Idaho Power decisions at 9.60% and 9.50%
9	OGE Energy	9.50%	One decision in Oklahoma
10	Portland General Electric	9.42%	Two decisions at 9.50% and 9.34% in Oregon
11	WEC Energy	<u>9.83%</u>	Two decisions at 9.86% in Michigan and 9.80% in Wisconsin
12	Average	<u>9.57%</u>	Excluding Evergy

* Data Per RRA

** Includes seven decisions as follows: 2 in Indiana at 9.86% and 9.87% and two in Oklahoma at 9.5% and 9.3% as well as decisions in Texas, Virginia and Kentucky at 9.76%, 9.75% and 9.75% respectively.

Comparison of AG and Consumers Energy Peer Groups

Line	Value Line Electric Utilities	2024 Revs. (\$M)	Elimination Factors							Peer Group per			
			Revs. Over Under 20 B +	1 B	No Div. Grth	Foreign	Reorg. M & A	No/Low Hist. EPS Growth	OS Wind & Wldfr.	Large Gas, NU Ops & CMS	Total Factors	AG	DTEE
1	Consolidated Edison	15,256										x	
2	Dominion Energy	14,459			Yes					Yes	2		x
3	Duke Energy	30,357	Yes								1		x
4	Eversource Energy	11,901					Yes				1		
5	Exelon	23,028	Yes								1		
6	FirstEnergy	13,472						Yes			1		
7	Hydro One Limited	5,873				Yes					1		
8	NextEra Energy	24,753	Yes							Yes	2		x
9	PPL Corp.	8,462						Yes			1		x
10	Public Service Enterp. Group	10,290						Yes			1		
11	Southern Co.	26,724	Yes								1		x
12	ALLETE	1,530					Yes				1		
13	Alliant Energy	3,981										x	x
14	Ameren	7,623										x	x
15	American Electric Power	19,721										x	x
16	CMS Energy	7,515								Yes	1		
17	CenterPoint Energy	8,643										x	
18	DTE Energy	12,457										x	x
19	Entergy	11,880					Yes	Yes			2		x
20	Fortis	11,508				Yes					1		
21	Energy	5,847										x	x
22	MGE Energy	677		Yes							1		
23	OGE Energy	2,985										x	x
24	Otter Tail	1,330								Yes	1		
25	WEC Energy	8,600										x	
26	Avista	1,938								Yes	1		x
27	Black Hills	2,128					Yes			Yes	2		
28	Edison International	17,599								Yes	1		
29	Hawaiian Electric	3,220			Yes			Yes			2		
30	IDACORP	1,827										X	x
31	Northwestern	1,514					Yes				1		x
32	Pacific Gas & Electric	24,419	Yes							Yes	2		
33	Pinnacle West Capital	5,125						Yes			1		x
34	Portland General Electric	3,440										x	x
35	Sempra Energy	13,185				Yes					1		
36	TXNM Energy	1,971					Yes				1		x
37	Xcel Energy	13,441								Yes	1		x
38	Unitil	495		Yes							1		
	Totals		<u>5</u>	<u>2</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>6</u>	<u>5</u>	<u>4</u>	<u>33</u>	<u>11</u>	<u>19</u>

Companies Eliminated from Peer Group Consideration
(due to M & A, Reorg. and EPS Growth Disruptions)

Line Company involved in M & A, Reorg.

- 1 Eversource
- 2 Allete
- 3 Entergy*
- 4 TXNM Energy*
- 5 Black Hills
- 6 NorthWestern Energy*

Anticipated Actions to be Taken per Value Line

- Selling Water Utility business for \$2.4 billion
Going Private in \$6.2 billion deal with Global Infrastructure Partners
Selling Louisiana Gas Distribution business
Being acquired by Blackstone Infrastructure for \$11.5 billion
Black Hills and NorthWestern in Aug. 2025 announced merger plans
Black Hills and NorthWestern in Aug. 2025 announced merger plans

	<u>Company with Earnings Disruption</u>	<u>EPS Per Value Line Investment Survey</u>					<u>2025 Est.</u>
		<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>	
5	First Energy	\$ 2.39	\$ 2.60	\$ 2.41	\$ 2.56	\$ 2.63	\$ 2.55
6	Entergy*	3.45	3.44	2.69	5.55	2.45	3.35
7	Hawaiian Electric	1.80	2.25	2.20	1.81	(10.42)	0.95
8	Pinnacle West*	4.87	5.47	4.26	4.41	5.24	4.80
9	PPL Corp.*	2.04	0.53	1.41	1.60	1.68	1.85
10	P. S. Enterprise Group	3.43	3.65	3.47	3.48	3.68	4.00

Comments based on Value Line and Company Documents

Non core operations negatively affecting overall results in 2025
Special Items in 2023; progress from 2024 EPS to 2025 unclear
Legal & Other expenses due to 2023 Wildfires
Hot 2024 weather; plant overhaul costs in 2025; growth unclear.
Sale of Assets and Reorganization; future growth is unclear
Company Financials show 2023 and 2024 EPS at \$5.13 per share
and \$3.54 per share (special items). Overall results
for 2020 to 2024 per Value Line are "flat".

* These companies have been included in the CECo peer group

MICHIGAN PUBLIC SERVICE COMMISSION
Consumers Energy - Electric Rate Case
Peer Group Market to Book Equity Ratios-Mar. 31, 2025

Case No. U-21870
Exhibit AG-43
September 30, 2025
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Line	Company (a)	Ticker (b)	Mkt. Val. p/Sh. Of Com. Equity Mar. 31, 2025* (c)	Millions		Book Value per Share (d) / (e) (f)	Market to Book Ratio (c) / (f) (g)
				Book Value of Com. Equity** (d)	Common Shares** (e)		
1	Alliant Energy	LNT	\$ 64.35	\$ 7,093	256.9	\$ 27.61	2.33
2	Ameren	AEE	100.40	12,219	270.3	45.21	2.22
3	American Electric Power	AEP	109.27	27,321	535.2	51.05	2.14
4	CenterPoint Energy	CNP	36.23	10,955	652.7	16.78	2.16
5	Consolidated Edison	ED	110.56	23,783	366.0	64.98	1.70
6	DTE Energy	DTE	138.27	11,921	207.5	57.45	2.41
7	Evergy	EVRG	68.95	9,931	230.1	43.16	1.60
8	IDACORP	IDA	116.22	3,346	54.0	61.96	1.88
9	OGE Energy	OGE	45.96	4,616	201.3	22.93	2.00
10	Portland General Electric	POR	44.60	3,844	109.5	35.11	1.27
11	WEFC Energy Group	WEC	108.98	12,976	319.1	40.66	2.68
13	Average						2.04

* Per Yahoo

** Per SEC Filings on Form 10-Q for quarter ended March 2025

MICHIGAN PUBLIC SERVICE COMMISSION
Consumers Energy Company - Electric Rate Case

Case No. U-21870
Exhibit AG-44
September 30, 2025
Page 1 of 2

12 M.E. Mar. 2025 Rating Agency Cash Flow Ratios
(With ROE at 9.80% and a 50% Common Equity Ratio)

		<u>12 M.E. Mar. 2025 Adjusted Moody's Cash Flow Ratio (\$ Mil.)</u>			
<u>Line</u>	<u>Caption</u>	<u>Cash From Operations Pre-Wkg. Cap. (b)</u>	<u>Debt (c)</u>	<u>Ratio (e) / (f) (d)</u>	<u>Note</u>
1	12 M.E. Mar. 2025 Actual Ratio Results	\$ 2,379	\$ 12,241	19.4%	1
2	Increase Common Equity (to 50% vs 48.4%)	37	(369)		2
3	Decrease ROE by 36 basis points (to 9.80% vs 10.16%)	(40)			3
4	Pro Forma w/50% Common Equity, 9.8% ROE	<u>\$ 2,376</u>	<u>\$ 11,872</u>	20.0%	L 1 + L 2 + L 3
5	Ratings Downgrade Risk			Below 18%	4

Notes

- From page 1 of Moody's May 29, 2025 report on Consumers Energy (see Discovery Response AG-CE-0400)
- As noted below under "Capitalization", the Company's Common Equity ratio was 48.4% over the 2024-25 period. Adjusting to 50% shifts \$369 million from long-term debt to common equity (1.6% x \$23.1 billion = \$369 million).
Higher Common Equity of \$369 million x the Company's earned ROE of 10.16% = \$37 million in higher Net Income.
- Decreasing the reported 2023 actual ROE of 10.16% to 9.80% (0.36% change) produces a \$40 million decrease in total Company earnings (0.36% x \$11.2 billion = \$40 million).
Note: Consumers 12 M.E. Mar 2025 Net Income of \$1.138 billion / \$11.2 billion common equity (below) = an 10.16% ROE.
- From page 2 of Moody's May 29, 2025 report on Consumers Energy under "Factors that could lead to a downgrade" (see Discovery Response AG-CE-0400)

<u>Capitalization</u>	<u>Per SEC Filings</u>		<u>Average</u>		<u>Rebalancing</u>	<u>Rebalanced</u>	
<u>Avg. 12 M.E Mar. 2025 Capitalization (\$ Mil.)</u>	<u>Mar. 2024</u>	<u>Mar. 2025</u>	<u>Amount</u>	<u>% Capital</u>	<u>Adjustmts.</u>	<u>Amount</u>	<u>% Capital</u>
Long-Term Debt	\$ 11,788	\$ 12,007	\$ 11,898	51.4%	\$ (369)	\$ 11,529	49.8%
Preferred Stock	37	37	37	0.2%		37	0.2%
Common Equity	<u>10,773</u>	<u>11,619</u>	<u>11,196</u>	<u>48.4%</u>	369	<u>11,565</u>	<u>50.0%</u>
Total	<u>\$ 22,598</u>	<u>\$ 23,663</u>	<u>\$ 23,131</u>	<u>100.0%</u>		<u>\$ 23,131</u>	<u>100.0%</u>

2022 Rating Agency Cash Flow Ratios
Impact of Lower Gas in Storage

Line	Caption	2022 Adjusted Moody's Cash Flow Ratio (\$ Millions)			Note
		Cash From Operations Pre-Wkg. Cap. (b)	Debt (c)	Pro Forma Ratio (e) / (f) (d)	
1	2022 Actual Ratio Results	\$ 2,096	\$ 10,472	20.0%	1
Pro Forma Adjustment - Lower Gas in Storage					
2	Lower Debt Financing - Gas in Storage		(378)		2
3	Lower Interest Expenbse	11			3
4	2022 Pro Forma results with lower Gas in Storage	\$ 2,107	\$ 10,094	20.9%	L 1 + L 2 + L 3
5	Improvement in Ratio Results			0.9%	L 4 less L 1

Notes

- From page 1 of Moody's May 29, 2025 report on Consumers Energy (see AG-CE-0400)
- Per CMS/Consumers Energy 2022 Form 10-K, Gas in Storage increased from \$462 million (Dec 2021) to \$840 million (Dec 2022) which is a \$378 million difference.
- Equals \$378 million capital difference x avg. debt rate from case U-21308 of 4.7% x after tax rate of 64%.

MICHIGAN PUBLIC SERVICE COMMISSION
Consumers Energy - Electric Rate Case

Case No. U-21870
Exhibit AG-45
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Returns of Large Capitalization U.S. Stocks (1926 to 2024)

<u>Line</u>	<u>Year</u>	<u>Large Co. Total Returns*</u>	<u>Year</u>	<u>Large Co. Total Returns*</u>	<u>Year</u>	<u>Large Co. Total Returns*</u>
1	1926	11.62%	1958	43.36%	1991	30.47%
2	1927	37.49%	1959	11.96%	1992	7.62%
3	1928	43.61%	1960	0.47%	1993	10.08%
4	1929	-8.42%	1961	26.89%	1994	1.32%
5	1930	-24.90%	1962	-8.73%	1995	37.58%
6	1931	-43.34%	1963	22.80%	1996	22.96%
7	1932	-8.19%	1964	16.48%	1997	33.36%
8	1933	53.99%	1965	12.45%	1998	28.58%
9	1934	-1.44%	1966	-10.06%	1999	21.04%
10	1935	47.67%	1967	23.98%	2000	-9.10%
11	1936	33.92%	1968	11.06%	2001	-11.89%
12	1937	-35.03%	1969	-8.50%	2002	-22.10%
13	1938	31.12%	1970	3.86%	2003	28.68%
14	1939	-0.41%	1971	14.30%	2004	10.88%
15	1940	-9.78%	1972	18.99%	2005	4.91%
16	1941	-11.59%	1973	-14.69%	2006	15.79%
17	1942	20.34%	1974	-26.47%	2007	5.49%
18	1943	25.90%	1975	37.23%	2008	-37.00%
19	1944	19.75%	1976	23.93%	2009	26.46%
20	1945	36.44%	1977	-7.16%	2010	15.06%
21	1946	-8.07%	1978	6.57%	2011	2.11%
22	1947	5.71%	1979	18.61%	2012	16.00%
23	1948	5.50%	1980	32.50%	2013	32.39%
24	1949	18.79%	1981	-4.92%	2014	13.69%
25	1950	31.71%	1982	21.55%	2015	1.38%
26	1951	24.02%	1983	22.56%	2016	11.96%
27	1952	18.37%	1984	6.27%	2017	21.83%
28	1953	-0.99%	1985	31.73%	2018	-4.38%
29	1954	52.62%	1986	18.67%	2019	31.49%
30	1955	31.56%	1987	5.25%	2020	18.40%
31	1956	6.56%	1988	16.61%	2021	28.71%
32	1957	-10.78%	1989	31.69%	2022	-18.11%
33			1990	-3.10%	2023	26.29%
34					2024	25.02%
35					99 Yr. Avg.	12.29%

*Data from 2023 SBBI Yearbook, by Ibbotson and Duff & Phelps and for 2023 and 2024 as follows

Projected Return of the S&P 500

<u>Line</u>	<u>Caption or Description</u>	<u>Number of Companies</u>	<u>Related Mkt Capital \$ Trillions</u>	<u>% of Total in Analysis</u>	<u>Dividend Yield</u>	<u>Earnings Growth Factor</u>	<u>Total Return</u>	<u>Note</u>
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
1	Companies Set 1	331	\$ 34.62	79.42%	1.36%	11.15%	12.51%	Note 1
2	Companies Set 2	<u>134</u>	<u>8.97</u>	<u>20.58%</u>	1.92%	8.23%	<u>10.15%</u>	Note 2
3	Totals	<u>465</u>	<u>\$ 43.59</u>	<u>100.00%</u>			<u>12.02%</u>	

Note 1 See Exhibit A-14 (AEB-1) analysis with the column (e) and (f) data from page 16 at top of page.

Note 2 Rates from WP-AG46A and source data from Value line. Dividend Yield information per Exhibit A-14 model data.

Exhibit AG-47

(Moody's May 29^J 2025 Report)

CONFIDENTIAL

Exhibit AG-48

(S&P August 20, 2024 Report)

CONFIDENTIAL

Exhibit AG-49

(Fitch April 16, 2024 Report)

CONFIDENTIAL

U21870-AG-CE-0398

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Question:

79. Refer to page 16 of witness Bulkley's direct testimony and footnotes 16 and 17. Please:

- a. Provide a copy of the referenced Blue Chip Forecast.
- b. Provide a copy of the latest Blue Chip Forecast report available.

Response:

See Attachments 1, 2, and 3.

Witness: Ann E. Bulkley

Date: September 9, 2025

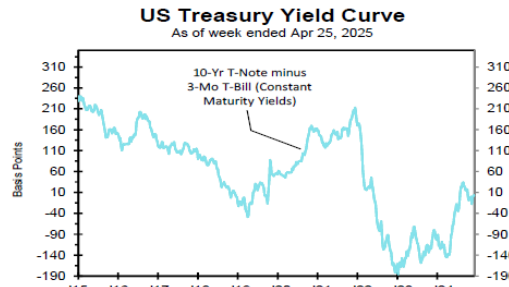
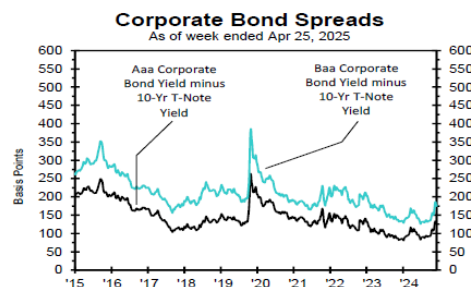
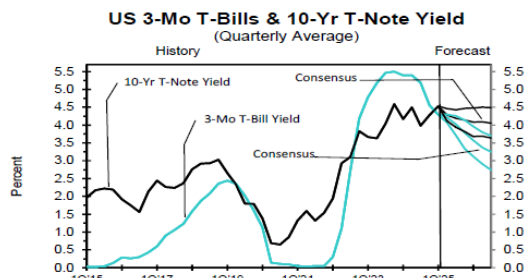
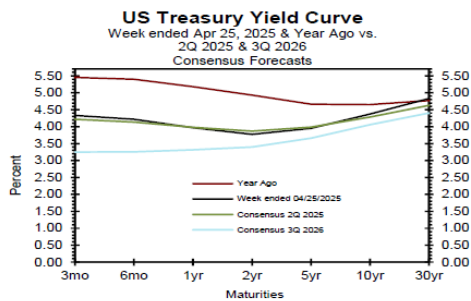
2 ■ BLUE CHIP FINANCIAL FORECASTS ■ MAY 1, 2025

Consensus Forecasts of U.S. Interest Rates and Key Assumptions

Interest Rates	History								Consensus Forecasts-Quarterly Avg.					
	Average For Week Ending				Average For Month				Latest Qtr	2Q 2025	3Q 2025	4Q 2025	1Q 2026	2Q 2026
	Apr 25	Apr 18	Apr 11	Apr 4	Mar	Feb	Jan	1Q 2025	2025	2025	2025	2026	2026	2026
Federal Funds Rate	4.33	4.33	4.33	4.33	4.33	4.33	4.33	4.33	4.3	4.1	3.9	3.6	3.4	3.3
Prime Rate	7.50	7.50	7.50	7.50	7.50	7.50	7.50	7.50	7.5	7.3	7.0	6.7	6.6	6.4
SOFR	4.30	4.33	4.37	4.38	4.33	4.34	4.32	4.33	4.3	4.1	3.9	3.6	3.4	3.3
Commercial Paper, 1-mo.	4.34	4.40	4.34	4.31	4.32	4.31	4.32	4.32	4.3	4.1	3.9	3.6	3.4	3.3
Treasury bill, 3-mo.	4.33	4.33	4.33	4.31	4.34	4.33	4.34	4.34	4.2	4.0	3.8	3.6	3.4	3.2
Treasury bill, 6-mo.	4.22	4.21	4.18	4.21	4.27	4.30	4.26	4.28	4.1	4.0	3.7	3.5	3.4	3.3
Treasury bill, 1 yr.	3.97	3.98	3.95	3.97	4.06	4.19	4.18	4.14	4.0	3.8	3.7	3.5	3.4	3.3
Treasury note, 2 yr.	3.77	3.82	3.83	3.81	3.97	4.21	4.27	4.15	3.9	3.7	3.6	3.5	3.5	3.4
Treasury note, 5 yr.	3.95	3.97	3.99	3.86	4.04	4.28	4.43	4.25	4.0	3.9	3.8	3.7	3.7	3.7
Treasury note, 10 yr.	4.37	4.34	4.33	4.13	4.28	4.45	4.63	4.45	4.3	4.2	4.1	4.1	4.1	4.1
Treasury note, 30 yr.	4.83	4.78	4.74	4.51	4.60	4.68	4.85	4.71	4.6	4.5	4.5	4.4	4.4	4.4
Corporate Aaa bond	5.62	5.61	5.66	5.36	5.38	5.39	5.55	5.44	5.3	5.3	5.2	5.2	5.2	5.1
Corporate Baa bond	6.12	6.13	6.19	5.84	5.81	5.82	5.97	5.86	6.1	6.1	6.0	6.0	6.0	5.9
State & Local bonds	4.59	4.57	4.58	4.24	4.22	4.16	4.18	4.19	4.5	4.4	4.4	4.3	4.3	4.3
Home mortgage rate	6.81	6.83	6.62	6.64	6.65	6.84	6.96	6.82	6.6	6.5	6.4	6.3	6.2	6.2

Key Assumptions	History								Consensus Forecasts-Quarterly					
	2Q 2023	3Q 2023	4Q 2023	1Q 2024	2Q 2024	3Q 2024	4Q 2024	1Q 2025	2Q 2025	3Q 2025	4Q 2025	1Q 2026	2Q 2026	3Q 2026
Fed's AFE \$ Index	114.6	115.0	116.6	115.5	117.3	114.9	117.9	119.8	114.9	114.2	113.3	112.6	112.5	112.4
Real GDP	2.4	4.4	3.2	1.6	3.0	3.1	2.4	-0.3	0.8	0.3	0.8	1.4	1.8	2.0
GDP Price Index	1.9	3.2	1.5	3.0	2.5	1.9	2.3	3.7	3.4	3.2	2.9	2.6	2.3	2.3
Consumer Price Index	3.0	3.5	2.8	3.7	2.8	1.4	3.0	3.8	3.4	3.7	3.1	2.8	2.5	2.4
PCE Price Index	2.9	2.7	1.7	3.4	2.5	1.5	2.4	3.6	3.5	3.4	3.0	2.6	2.4	2.4

Forecasts for interest rates and the Federal Reserve's Advanced Foreign Economies Index represent averages for the quarter. Forecasts for Real GDP, GDP Price Index, CPI and PCE Price Index are seasonally adjusted annual rates of change (saar). Individual panel members' forecasts are on pages 4 through 9. Historical data: Treasury rates from the Federal Reserve Board's H.15; AAA-AA and A-BBB corporate bond yields from Bank of America-Merrill Lynch and are 15+ years, yield to maturity; State and local bond yields from Bank of America-Merrill Lynch, A-rated, yield to maturity; Mortgage rates from Freddie Mac, 30-year, fixed; SOFR from the New York Fed. All interest rate data are sourced from Haver Analytics. Historical data for Fed's Major Currency Index are from FRSR H.10. Historical data for Real GDP, GDP Price Index and PCE Price Index are from the Bureau of Economic Analysis (BEA). Consumer Price Index history is from the Department of Labor's Bureau of Labor Statistics (BLS).



VLFAAlert



ValueLinefunds

4th Quarter 2018

Volume VII, Issue IV

00207257



Mitchell Appel
President
Value Line Funds

Dear Fellow Shareholder,

Thank you for choosing Value Line Funds as a part of your diversified investment portfolio. For over half a century, Value Line Funds has championed sound investment principles and helped thousands of investors accomplish their financial goals with our actively managed family of mutual funds.

We hope you enjoy this edition of the VLFAAlert and thank you for your continued support.

Volatility is Not Risk:

Why the Difference is Critical to Long-Term Results

2017 lulled many equity investors into a comfort zone based on historically low volatility. 2018 has been more volatile—with tighter monetary policy and geopolitical and trade policy uncertainty among the drivers of the increase. But volatility levels in 2018 are actually historically normal—even with the bouts of volatility anticipated ahead of the November mid-term elections. But volatility is not risk. And recognizing the difference can be critical to your long-term investment returns.

Defining Our Terms

Volatility is simply the measure of the up and down movements of the market. For example, since 1950, when the Value Line Funds were first established, the average maximum drawdown in the broad U.S. equity market during midterm election years has been -17%, with weakness tending to be concentrated in the pre-election days. However, the good news is that there has been a consistent tendency historically for post-drawdown rallies, averaging +32% in the subsequent year.¹ Volatility? Yes! Uncertainty? Yes! But volatility is only risk if you act during down times—that is, only if you sell. To which the often-invoked quip may well be the most prudent answer: "Don't just do something, sit there."

Risk, on the other hand, is the probability of a permanent loss. You might think of risk as the possibility of having to lower your quality of life in the future.

"Volatility is not synonymous of risk but—for those who truly understand it—of wealth."

- Francois Rochon*

Recognizing the Difference

Volatility is independent of risk. Too many investors let an investment's short-term price movements, or perceptions of short-term price movements, drive their buying and selling decisions. Too often volatility is regarded as something to be

avoided. But since short-term price moves are unknowable and independent of underlying fundamentals and value, such volatility should not be a determinant.

And ALL investments have risk of some kind, including cash and CDs. One just needs to pick the risks that are best to take based on your individual tolerance level, time horizon and financial needs and goals.

As famed investor and Berkshire Hathaway CEO Warren Buffet wrote:

"Stock prices will always be far more *volatile* than cash-equivalent holdings. *Over the long term*, however, currency-denominated instruments are *riskier* investments — far riskier investments — than widely diversified stock portfolios that are bought over time and that are owned in a manner invoking only token fees and commissions. **That lesson has not customarily been taught in business schools, where volatility is almost universally used as a proxy for risk. Though this pedagogic assumption makes for easy teaching, it is dead wrong: Volatility is far from synonymous with risk.** Popular formulas that equate the two terms lead students, investors and CEOs astray."²

**"Volatility is our friend.
Volatility has nothing to do with risk."**

- Mohnish Pabrai*

(continued on back)

Value Line Article on Volatility vs. Risk

It's a Matter of Time, Not Timing

Most experienced investors do not fear volatility, only unrecoverable loss. But most losses, as measured by a day, a week, a quarter or a year, are recoverable over time. Declines in principal value have historically been temporary. Of course, there are true risks. A company could go totally out of business. An innovation could transform an industry so profoundly to make a once "blue chip" company a relic. A geopolitical event could happen to negate all assumptions. But these occurrences are rare. For the vast majority of investors, maintaining a long-term perspective is the real key to attaining gains over their investing lifetime. Historically, since World War II, the longer you hold stocks, the narrower the range of returns.³ In other words, even if volatility is a concern, it decreases the longer you hold stocks. It's the old adage: what matters is time in the market, not market timing.

"You can't overlook the volatility, but you don't let it push you around in the market."

*- Boone Pickens**

solutions designed to meet a broad array of investment goals. Whether you are looking for income or long-term capital appreciation, whether you choose to invest in equities, taxable or tax-exempt fixed income or a hybrid fund of multiple asset classes, you can rely on the solid fundamentals of Value Line Funds.

Value Line Funds Include:
Equity Funds
Premier Growth Fund
Larger Companies Focused Fund
Mid Cap Focused Fund
Small Cap Opportunities Fund
Hybrid Funds
Asset Allocation Fund
Capital Appreciation Fund
Fixed Income Funds
Tax Exempt Fund
Core Bond Fund

Exhibit AG-52

(RRA Report on ROE Decisions - 1st
Half 2025)

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Operations & Maintenance - Summary

<u>Line</u>	<u>Description</u> (a)	<u>Millions Of Dollars</u> (b)	<u>Note or Ref.</u> (c)
1	O&M Per Company	<u>\$ 805.0</u>	1
	<u>Attorney General Changes</u>		
2	Electric Division	(42.3)	Ex. AG-54
3	Line Clearing Expense to Regulatory Asset	(76.5)	Testimony
4	IT Projects Expense	(18.3)	Testimony
5	Incentive Compensation	<u>(0.8)</u>	Testimony
6	Total Change	<u>\$ (137.9)</u>	(Sum of L2 to L5)
7	AG Revised O&M Level	<u>\$ 667.2</u>	(L1 + L6)
8	Change in O&M	<u>\$ (137.9)</u>	(L7 less L1)

Note 1 Per Company Exhibit A-13 (JCA-41), Sched. C-5, page 1, Line 25

Electric Division

<u>Line</u>	<u>Caption or Description</u> (a)	<u>Amount in Millions</u> (b)	<u>Note</u> (c)
1	Company Estimate	\$ 301.0	1
	<u>AG Adjustments</u>		
2	Service Restoration	(20.6)	Exhibit AG-55
3	Staking & Locating	(6.7)	Exhibit AG-56
4	Lines Demand - HVD	(1.9)	Testimony
5	Service Calls	(0.8)	Testimony
6	Lines Reliability - LVD	(7.1)	Testimony
7	Lines Reliability - HVD	(0.7)	Testimony
8	Electric Distribution - LVD	<u>(4.5)</u>	Testimony
9	Total Adjustments	<u>\$ (42.3)</u> <u>\$ (42.3)</u>	2
10	Attorney General Estimate	<u>\$ 258.7</u>	3
11	Reduction in O & M	<u>\$ (42.3)</u>	4

1 Per Exhibit A-124 (MKP-14) Line 55
2 Sum of Lines 2 to 8
3 Line 1 less Line 9
4 Line 10 less Line 1

Service Restoration O&M

(Thousands of Dollars)

<u>Line</u>	<u>Caption or Item</u> (a)	<u>2020</u> (b)	<u>2021</u> (c)	<u>2022</u> (d)	<u>2023</u> (e)	<u>2024</u> (f)	<u>Five Yr. Average</u> (g)
1	Service Restoration*	\$ 71,262	\$ 159,659	\$ 113,271	\$ 188,041	\$ 156,098	<u>\$ 137,666</u>
<hr/>							
		<u>Five Year</u> <u>Average</u>	<u>2025</u>	<u>2026</u>	<u>4 Months in</u> <u>2027</u>	<u>Projected</u> <u>Test Yr. Ended</u> <u>Apr. 2027</u>	
2	Inflation Factors**		2.10%	2.04%	2.40%		
3	Five Yr. Avg.(From Linw 1) + Inflation	\$ 137,666	\$ 140,557	\$ 143,425	\$ 144,572	\$ 144,572	
4	Company Estimate *					<u>165,215</u>	
5	Service Restoration O&M Reduction	L 3 less L 4				<u>\$ (20,643)</u>	

* Per Exhibit A-124 (MPK-14), Line 23

** Per Company WP-PDD37.

Staking & Locating

<u>Line</u>	<u>Caption</u> (a)	<u>2021</u> (b)	<u>2022</u> (c)	<u>2023</u> (d)	<u>2024</u> (e)	<u>Reference</u> (f)
<u>Historic Information</u>						
1	Consumers Electric Staking Orders	408,807	411,008	415,303	433,137	Note 1
2	Avg. Annualized Increase (3 Yrs.)	2% annualized over 3 yrs.				
<u>O&M Projected Expense Information</u>						
		<u>2025</u>	<u>2026</u>	<u>2027</u>	Projected Test Yr. Ending <u>Apr-27</u>	
3	Staking Orders per AG Case	441,800	450,636	459,648	453,640	Note 2
4	Contractor Rate - Projected Test Year	\$ 26.93	\$ 27.81		\$ 27.22	Note 3
5	AG Forecasted Expense for Contractor Staking				\$ 12,348	L 3 x L 4
6	MISS DIG Dues/Feed				\$ 734	Note 1
7	Total AG Forecastd Expense				\$ 13,082	L 5 + L 6
8	Company Forecast				\$ 13,948	
9	Reduction in Staking & Locating O&M Expense Due to Volume				\$ (866)	L 7 - L 8
10	2024 Staking an Locating Expense				\$ 5,773	Note 1
11	2025 Staking an Locating Expense				\$ 11,645	Note 1
12	Remove Increase Due to Expanding Dedicated Contractor to All Service Areas				\$ (5,872)	L 10 - L 11
13	Total Reduction to Staking and Locating Expense				\$ (6,738)	L 9 + L 12

Notes 1 Exhibit AG-57 includes DR AG-CE-0445 and 0446 with Attachment 1
2 2024 escalated at 2% per year
3 AG-CE-441

U21870-AG-CE-0441
Page 1 of 1

Question:

122. Refer to lines 18-26 on page 146 of Mr. Kelly's direct testimony about contracting for staking and locating services. Please:

- a. Confirm that the Company in the electric business is following the same strategy as the gas business in contracting for staking and locating services. If not confirming, identify the differences.
- b. Explain why the Company did not change to another shared contractor when it experienced problems with the existing contractor instead of moving to a dedicated contractor in Kent and Oakland counties in 2023-2024.
- c. Provide the average cost per completed staking and locating request paid to shared and dedicated contractors, separately, during each year from 2021 to 2024 and forecasted for 2025, 2026, and 2027.

Response:

- a. Confirmed.
- b. The Company's RFP returned a bid from only one shared contractor, and the Company is not aware of any other shared vendors in Michigan.
- c. See below:

	Shared Staking (\$)	Dedicated Staking (\$)	Notes
2021	7.51	-	
2022	8.09	-	
2023	10.09	-	
2024	9.97	34.39	
2025 Projected	10.70	26.75	The Shared staking average projected cost is only for the first 3 months still under the prior contract rates.
2026 Projected	-	26.93	
2027 Projected	-	27.81	

Witness: Michael P. Kelly
Date: September 10, 2025

U21870-AG-CE-0445

Page 1 of 1

Question:

126. Refer to Figure 49 and lines 6-14 on page 149 of Mr. Kelly's direct testimony on the cost of staking and locating services. Please:

- a. Expand the table and provide the same information for each year 2021-2024 actual and forecasted for 2025, 2026, 2027 and provide it in Excel.
- b. Provide a breakdown of the Licenses, Permits, and MISS DIG Fees for each year 2021-2027 and explain why MISS DIG Fees are doubling. Explain if and how the Company has appealed or pushed back on such a large increase occurring in a short period.
- c. Provide the calculations for the \$6,760,338 and \$725,589 in Excel with supporting data and assumptions.

Response:

Please refer to Attachment 1 for the requested information for parts a., b., and c. in Excel format

- b. The Company has not questioned the costs of a non-profit corporation that operates as the underground utility safety notification system for the entire state.

Witness: Michael P. Kelly

Date: September 10, 2025

CECo Response to AG-CE-0445

21870-AG-CE-0445							
Attachment 1							
a. Expand the table and provide the same information for each year 2021-2024 actual and forecasted for 2025, 2026, 2027 and provide it in Excel.							
			Shared Staking	Dedicated Staking	Company Labor	License, Permits, MISS DIG fees	Total
	2021	3,071,647	-	-	-	179,152	3,250,799
	2022	3,326,302	-	-	-	261,171	3,587,472
	2023	3,723,873	-	-	-	251,180	3,975,053
	2024	3,726,048	2,046,613	-	-	375,399	6,148,061
	2025 Projected	207,709	11,436,962	9,225	606,456	12,260,353	
	2026 Projected	-	12,878,309	9,456	667,102	13,554,866	
	2027 Projected	-	14,228,614	9,692	733,812	14,972,118	
b. Provide a breakdown of the Licenses, Permits, and MISS DIG Fees for each year 2021-2027 and explain why MISS DIG Fees are doubling. Explain if and how the Company has appealed or pushed back on such a large increase occurring in a short period							
			License, Permits, MISS DIG fees				
	2021	179,152					
	2022	261,171					
	2023	251,180					
	2024	375,399					
	2025 Projected	606,456					
	2026 Projected	667,102					
	2027 Projected	733,812					
c. Provide the calculations for the \$6,760,338 and \$725,589 in Excel with supporting data and assumptions							
		2024	Test Year	Increase		2024 Ave Cost	
	Volume	433,137	487,667	54,530		13.31	725,589
		2024	Test Year	Increase		TY Volume	
	Rate	13.31	27.17	13.86		487,667	6,760,338

U21870-AG-CE-0446

Page 1 of 1

Question:

127. Refer to Figure 50 on page 150 of Mr. Kelly's direct testimony on the number of staking and locating requests. Please expand the table to include the same information for each year 2021-2023 and provide it in Excel.

Response:

Please refer to Attachment 1 to this discovery response.

Witness: Michael P. Kelly

Date: September 10, 2025

CECo Response to AG-CE-0446

21870-AG-CE-0446			
Attachment 1			
		Base Units	Base Unit cost (\$/unit)
	2021 Actual	408,807	\$ 7.51
	2022 Actual	411,008	\$ 8.09
	2023 Actual	415,303	\$ 10.09
	2024 Actual	433,137	\$ 13.32
	2025 Projected	446,893	\$ 26.06
	2026 Projected	478,176	\$ 26.93
	2027 Projected	511,648	\$ 27.81

Computation of Revenue Deficiency for Projected Test Year Ending April 2027
 (\$000)

Line	Description (a)	Jurisdictional Company Filed Amount ³ (b)	AG Recommended Adjustments (c)	Revised Amount (d)
1	Rate Base ⁽¹⁾	\$ 15,367,518	\$ (679,128)	\$ 14,688,390
2	Rate of Return	6.35%	-0.29%	6.06%
3	Income Required	\$ 975,589	\$ (85,472)	\$ 890,116
4	Adjusted Net Operating Income ⁽²⁾	707,746	123,813	831,559
5	Income Deficiency (Sufficiency)	\$ 267,843	\$ (209,285)	\$ 58,558
6	Revenue Multiplier	1.3381	1.3381	1.3381
7	Revenue Deficiency (Sufficiency)	\$ 358,395	\$ (280,040)	\$ 78,355
	Return On Regulatory Asset - Tree Clearing Ramp-up	-	1,881	1,881
8	Return On Campbell Regulatory Asset	77,486	-	77,486
9	Adjusted revenue deficiency (sufficiency)	\$ 435,881	\$ (278,159)	\$ 157,722

⁽¹⁾ Rate Base Adjustments Exhibit AG-32.

⁽²⁾ AG adjustments to Operating Income

		Source
Revenue	\$ -	
Lower Forecast of O&M Expenses	137,900	Exhibit AG-53
Property Taxes	4,039	Exhibit AG-32
Depreciation Expense	27,991	Exhibit AG-32
Total	\$ 169,930	
Effective Tax Rate (1-1/1.3381)	25.27%	
Taxes	42,935	
Interest Synchronization for Cap. Ex. adjustments	(3,183)	AG-1.45 WP1
Adjusted Net Operating Income	\$ 123,813	

MICHIGAN PUBLIC SERVICE COMMISSION
Consumers Energy Company

Exhibit AG-59
Case No. U-21870
September 30, 2025
Page 1 of 1

Forestry Ramp-Up
Return on Regulatory Asset from O&M Deferral
(\$000)

Line No.	Description	(a)	(b)	(c)	Source	(d)
<u>Total Forestry/Clearing Expense</u>						
1	Total O&M Expense Line Clearing			186,684	A-170 (SES-1), Line 27 column (o)	
2	Baseline O&M Expense of Line Clearing			110,225	A-170 (SES-1), Line 27 column (h)	
3	Increase in O&M Expense In Excess of Baseline			76,459	Line 1 - Line 2	
<u>Revenue Requirement under Deferred O&M</u>						
4	Deferred O&M Expense		76,459		Line 3	
5	Average test year working capital		38,230		Line 4 / 2	
6	Short-Term Interest Rate		4.92%		A-14 (MRB-1) Line 10	
7	Revenue Requirement Addition from Deferred O&M			1,881	Line 5 x Line 6	

U21806-AG-CE-0672
Page 1 of 1

Question:

280. Refer to Ms. Conrad's direct testimony on the EICP incentive compensation plan. For each year 2020 to 2024, please provide the target performance for each of the operating measures compared to the actual results for those years. Identify what percentage of the target performance was achieved.

Response:

For years 2020 to 2023, see part III 086 and for 2024 see attachment 1 for the target performance for of the operating measures compared to the actual results for those years as well as the performance achieved.

Witness: Amy M. Conrad

Date: March 24, 2025

CECo Response U-21806 AG-CE-0672 and Part III Information 86

Non-officer																									
Annual Incentive Plan																									
		Operational Payout Metrics								Operational Payout Metrics								Operational Payout Metrics							
		Number of goals achieved	0-3	4	5	6	7	8	9	Number of goals achieved	0-3	4	5	6	7	8	9	Number of goals achieved	0-3	4	5	6	7	8	9
		Award %	0%	50%	75%	100%	125%	150%	200%	Award %	0%	50%	75%	100%	125%	150%	200%	Award %	0%	50%	75%	100%	125%	150%	200%
Plan Year																									
2019																									
2020																									
2021																									
Metric	Weighting	Target	Actual Achieved	Actual Payout %	Weighting	Target	Actual Achieved	Actual Payout %	Weighting	Target	Actual Achieved	Actual Payout %	Weighting	Target	Actual Achieved	Actual Payout %									
Operational	50%																								
•Employee Safety (Incidents or Recordable Incidents Rate)		54/0.67 or less	105/1.23	Not Met		54/0.67 or less	101/1.22	Not Met		≤ 81	135	Not Met													
•Eliminate Vintage Services		≥ 9,250	9,635	Met		≥ 9,250	9747	Met		N/A	N/A	N/A													
•Distribution reliability minutes		≤ 165	233	Not Met		≤ 180	195	Not Met		≤ 180	228	Not Met													
•Generation Customer Value (Fleet Availability)		≥ 72%	75%	Met		≥ 72%	76%	Met		≥ 76%	76%	Met													
•Customer Experience Index (Forrester Index)		≥ 71	69	Not Met		≥ 71	76	Met		≥ 78	73	Not Met													
•Employee Empowerment Index (Employee Empowerment Index, and Maintain top quartile employee engagement)						≥ 57 and 1st quartile employee engagement	≥ 63 and 1st quartile employee engagement	Met		≥ 65 and 1st quartile employee engagement	63 and 1st quartile employee engagement	Not Met													
•Gas Flow Deliverability		≥ 90%	91%	Met		≥ 92%	94%	Met		≥ 95%	96%	Met													
•Customer On Time Delivery (orders complete within target window)		≥ 70%	79%	Met		N/A	N/A	N/A		N/A	N/A	N/A													
•Service On Time Delivery (volume/adherence with target window)		≥ 65% / ≥ 95%	82%/96%	Met		N/A	N/A	N/A		N/A	N/A	N/A													
•Demand Response		N/A	N/A	N/A		≥ 469 MW	509 MW	Met		N/A	N/A	N/A													
•Trash to Landfill		N/A	N/A	N/A		≤ 4,864 TONS	3,794 Tons	Met		N/A	N/A	N/A													
•Cyber Security (phishing click rate)		≤ 5%	3%	Met		N/A	N/A	N/A		≤ 4%	3%	Met													
•Methane Emission Reduction (Reduction of Methane Emissions through replacements of Mains and Services)		N/A	N/A	N/A		N/A	N/A	N/A		≥ 422 MT	447 MT	Met													
•Clean Energy (Demand Response resources acquired, plus EnergyWaste Reduction programs)		N/A	N/A	N/A		N/A	N/A	N/A		≥ 608 MW	733 MW	Met													
Financial				50%				63%				38%													
Earnings Per Share	35%	See Officer Annual Incentive		44%		35%	See Officer Annual Incentive	47%		35%	See Officer Annual Incentive	21%													
Operating Cash Flow	15%	See Officer Annual Incentive		17%		15%	See Officer Annual Incentive	30%		15%	See Officer Annual Incentive	18%													
				111%				139%				77%													

CECo Response U-21806 AG-CE-0672 and Part III Information 86

2022 Non-Officer Incentive Compensation Plan Results

Operational Measures	Weighting	50% Threshold	75%	100% Target	125%	150%	175% Max	ACTUAL	Payout %
Employee Safety (Recordable Incidents Rate, High-Risk Injuries ¹ & No fatalities ²)	2.50%	a.1.74	a.1.31	a.1.20	a.1.15	a.1.10	a.1.03	a.1.17	145%
	2.50%	b. 34	b.32	b.30	b.28	b.26	b.24	b.22	
Culture Index (Empowerment, Employee Engagement & DEI)	8.3%	1 index at Target ³	2 index at Target ³	All 3 indexes at Target³	2 indexes at Target & 1 Index above Target	1 index at Target & 2 Indexes above Target	3 Indexes above Target	0	0%
Customer Experience (Survey Measuring CXi)	8.3%	69	71	73	75	77	79	73	100%
Electric Reliability (SAIDI)	8.3%	190	185	180	175	165	152	182	90%
Waste Elimination (Affordability)⁴ (O&M Savings through Waste Elimination)	8.3%	\$31M	\$35M	\$39M	\$43M	\$47M	\$55M	\$58M	175%
Methane Emission (Reduction through replacement of mains and services)	8%	357MT	378MT	399MT	420MT	457MT	483MT	448MT	144%
	50%							TOTAL	109%

Financial	Weighting	25% Threshold	100% Target	200% Maximum	Actual Achieved	Award Payout%
Earnings Per Share	50%	\$2.71	\$2.85	\$2.99	\$2.89	160%

TOTAL EICP Award Payout Level = 135%

- 1 High-Risk = Recordable or non-recordable injury caused by a release of high energy
- 2 A fatality = zero payout for employee safety
- 3 Target = +2 from 2021 actual. Baseline will be reaffirmed in 2022 with move to new survey platform.
- 4 The Company is not seeking recovery of this measure as it is financial in nature.

CECo Response U-21806 AG-CE-0672 and Part III Information 86

2023 Non-Officer Incentive Compensation Plan Results

Operational Measures	Weighting	50% Threshold	75%	100% Target	125%	150%	175% Max	ACTUAL	Payout %
Employee Safety (Recordable Incidents Rate, High-Risk Injuries ¹ & No fatalities ²)	2.50%	a.1.65	a.1.28	a.1.07	a.0.97	a.0.87	a.0.77	a.1.48	141%
	2.50%	b. 32	b.30	b.27	b.25	b.23	b.20	b.10	
Culture Index (Empowerment, Employee Engagement & DEI)	8.3%	1 of 3 indexes at target	2 of 3 indexes at target	All 3 indexes at target	2 indexes at target & 1 index above target	1 index at target & 2 indexes above target	3 indexes above target	0	0%
Customer Experience (Survey Measuring CXi)	8.3%	66	68	73	74	75	80	64	0%
Electric Reliability (SAIDI)	8.3%	185	180	170	160	155	150	176	85%
Waste Elimination (Affordability) ³ (O&M Savings through Waste Elimination)	8.3%	\$30M	\$35M	\$45M	\$50M	\$55M	\$65M	\$79M	175%
Methane Emission (Reduction through replacement of mains and services)	8%	414MT	436MT	459MT	485MT	510MT	551MT	533MT	164%
	50%								TOTAL

Financial	Weighting	25% Threshold	100% Target	200% Maximum	Actual Achieved	Award Payout%
Earnings Per Share	50%	\$2.95	\$3.06	\$3.25	\$3.11	140%

TOTAL EICP Award Payout Level = 117%

1 High-Risk = Recordable or non-recordable injury caused by a release of high energy
 2 A fatality = zero payout for employee safety
 3 The Company is not seeking recovery of this measure as it is financial in nature.

2024 Non-Officer Incentive Compensation Plan Results

Operational Measures	Weighting	50% Threshold	75%	100% Target	125%	150%	175% Max	ACTUAL	Payout %
Employee Safety (Recordable Incidents Rate, High-Risk Injuries ¹ & No fatalities ²)	5.83%	a.1.76	a.1.23	a. 0.96	a. 0.92	a. 0.86	a. 0.75	1.71	121%
	2.50%	b. 25	b.20	b.13	b.12	b.11	b. 10	11	
Culture Index (Empowerment, Employee Engagement & DEI)	8.3%	1 index at Target ³	2 index at Target ³	All 3 indexes at Target³	2 indexes at Target & 1 Index above Target	1 index at Target & 2 Indexes above Target	3 Indexes above Target	2 Index at Target	75%
Customer Experience (Survey Measuring CXI)	8.3%	64	67	69	71	75	81	64	50%
Electric Reliability (SAIDI)	8.3%	185	180	170	160	155	150	155	150%
Waste Elimination (Affordability)³ (O&M Savings through Waste Elimination)	8.3%	\$45M	\$55M	\$63M	\$66M	\$70M	\$74M	\$112M	175%
Methane Emission (Reduction through replacement of mains and services)	8.3%	278 MT	290 MT	302 MT	335 MT	366 MT	375 MT	472 MT	175%
	50%							TOTAL	124%

Financial	Weighting	25% Threshold	100% Target	200% Maximum	Actual Achieved	Award Payout%
Earnings Per Share	50%	\$3.17	\$3.29	\$3.51	\$3.34	136%

TOTAL EICP Award Payout Level = 130%*

- 1 High-Risk = Recordable or non-recordable injury caused by a release of high energy
- 2 A fatality = zero payout for employee safety
- 3 The Company is not seeking recovery of this measure as it is financial in nature.

* Actual payout was 134% inclusive of a 4% below the line adjustment for non-officers.

Question:

312. Refer to lines 1-15 on page 28 of Ms. Baker's rebuttal testimony on the four projects in the investment planning phase. Please:

- a. Confirm that the Company correctly characterized the four projects as being in the Investment Planning phase of development in response to DR AG-CE-0592 (Exhibit AG-27). If not confirming, provide evidence otherwise.
- b. Confirm that the detailed requirements phase has not been completed for the four projects. If not confirming, provide evidence otherwise.
- c. Explain why the Company cannot fund the projects to advance their development and request recovery in a later rate case.

Response:

- a. The Electric Geographic Information System (GIS) Design Platform Modernization project is in the Plan phase and Electric Geospatial Information System (GIS) Utility Network Transformation, Integrated Energy Management Platform Optimization, and Service Restoration Artificial Intelligence projects are in the Investment Planning phase as provided in my response to Discovery Request U21870-AG-CE-0592 (Exhibit AG-27). The Investment Planning phase of a project includes activities such as identifying high-level business, system, performance and security requirements to develop a business case as defined in my direct testimony on page 36, line 15 through page 37, line 11 and my rebuttal testimony on page 28, lines 6 through 12. The Plan phase is after the completion of the Investment Planning phase and funding is approved. The Plan phase includes activities such as project planning, scope definition, and detailed requirements, as indicated in my direct testimony on page 44, lines 1 through 2.
- b. The Company confirms that the detailed requirements phase has not been completed for these four projects.
- c. The Company is waiting for the cost to be approved for these projects before proceeding to mitigate the risk of disallowance and potential write-off that has occurred with some IT projects in the past.

Witness: Stacy H. Baker

Date: October 30, 2025

Question:

313. Refer to lines 16-23 on page 28 and lines 1-9 on page 29 of Ms. Baker's rebuttal testimony on the four projects in the investment planning phase. Please:

- a. Confirm that three of the projects have a Benefit to Cost ratio of negative 1.0 and the fourth project has a ratio of negative 0.479, indicating that either there are no cost savings related to the project or the cost of the project far exceeds any cost savings or financial benefits, as shown in the referenced pages of Exhibit A-21 in the table on page 29 of the rebuttal testimony. If not confirming, provide evidence otherwise.
- b. Confirm that after the ROM adjustments, the Company is still requesting inclusion in rate base and recovery of the costs associated with 80% of the forecasted capital expenditures for the four projects that are in the investment planning phase of development. If confirming, provide evidence otherwise.

Response:

- a. The Company confirms that the Electric Geographic Information System (GIS) Utility Network Transformation, Integrated Energy Management Platform Optimization, and Service Restoration Artificial Intelligence projects have a benefit/ cost ratio of negative 1.0. The Company confirms that the Electric GIS Design Platform Modernization project has a benefit/cost ratio of negative 0.479, as shown in referenced pages of Exhibit A-21 (SHB-6), in the table at the top of page 29 of my rebuttal testimony. I do not agree with the characterization that the benefit/cost ratios mean that the cost of these projects "far" exceeds any cost savings or financial benefits. There are also unquantified benefits to consider, as I explained on pages 28–29 of my rebuttal testimony.
- b. The Company confirms that after the ROM adjustments, the Company is requesting inclusion in rate base and recovery of the costs associated with 80% of the forecasted capital expenditures for the four projects in the table at the top of page 29 of my rebuttal testimony.

Witness: Stacy H. Baker

Date: October 30, 2025

Question:

314. Refer to lines 10-18 on page 29 and pages 30-31 of Ms. Baker's rebuttal testimony on the other five projects in the investment planning phase. Please:

- a. Confirm that the Company correctly characterized the five projects as being in the Investment Planning phase of development in response to DR AG-CE-0594 through 0596, AG-CE-0601, and AG-CE-0602 (Exhibit AG-29). If not confirming, provide evidence otherwise.
- b. Confirm that the detailed requirements phase has not been completed for the five projects. If not confirming, provide evidence otherwise.
- c. Explain why the Company cannot fund the projects to advance their development and request recovery in a later rate case.

Response:

- a. The Company confirms that the Critical Substation Upgrade, Operational Technology (OT) Datacenter Migration, Forward Web Proxy Services, and Physical Access Management and Alarm Response projects are in the Investment Planning phase as provided in response to Discovery Request Nos. U21870-AG-CE-0594, U21870-AG-CE-0595, U21870-AG-CE-0596, U21870-AG-CE-0601, and U21870-AG-CE-0602 (Exhibit AG-29, pages 1 through 12). However, the Data & Analytics Platform Rationalization project is in the Execute phase as of August 1, 2025. Please refer to U21870-AG-CE-0777 Part A for the rationale.
- b. The Company confirms that the detailed requirements phase has not been completed for the four projects that are in the Investment Planning phase. However, the Data & Analytics Platform Rationalization project is in Execute phase and detailed requirements is complete.
- c. The Company is waiting for the cost to be approved for these projects before proceeding to mitigate the risk of disallowance and potential write-off that has occurred with some IT projects in the past.

Witness: Stacy H. Baker

Date: October 29, 2025]

Question:

315. Refer to lines 14-23 on page 31, page 32, and lines 1-7 on page 33 of Ms. Baker's rebuttal testimony on the five projects in the investment planning phase. Please:

- a. Confirm that four of the projects have a Benefit to Cost ratio of negative 1.0, indicating that there are no cost savings or financial benefits related to the projects, and the fifth project has a ratio of 0.223, as shown on pages 47, 51, 114, 88, and 116 of Exhibit A-21. If not confirming, provide evidence otherwise.
- b. Confirm that after the ROM adjustments, the Company is still requesting inclusion in rate base and recovery of the costs associated with 80% of the forecasted capital expenditures for the five projects that were reported to be in the investment planning phase of development. If confirming, provide evidence otherwise.

Response:

- a. The Company confirms that the Critical Substation Upgrade, Operational Technology (OT) Datacenter Migration, Forward Web Proxy Services, and Physical Access Management and Alarm Response projects have benefit/cost ratio of negative 1.0, as shown on pages 47, 88, 114, and 116 of Exhibit A-21 (SHB-6). The Company confirms that the Data & Analytics Platform Rationalization project has a benefit/Cost ratio of 0.223, as shown on page 51 of Exhibit A-21 (SHB-6). I do not agree with the statement that a negative 1.0 benefit/cost ratio means that there are no cost savings or financial benefits. There are also unquantified benefits to consider.
- b. The Company confirms that after the ROM adjustments, the Company is requesting inclusion in rate base and recovery of the costs associated with 80% of the forecasted capital expenditures for the five projects on page 32, lines 1 through 31, of my rebuttal testimony, that are in the Investment Planning and Planning phases.

Witness: Stacy H. Baker

Date: October 29, 2025

Question:

316. Refer to lines 13-19 on page 33 and lines 1-10 on page 34 of Ms. Baker's rebuttal testimony on the Critical Substation Upgrade project. Please confirm that the project's ROM adjusted amount of \$2,798,533 does not show on line 242 of Exhibit A-20 (SHB-5) or in Exhibit A-12, Schedule B5.1. If not confirming, provide evidence otherwise.

Response:

The Company confirms that the Critical Substation Upgrade project's test year ROM Adjusted capital expenditures amount of \$2,798,533 is not on Exhibit A-20 (SHB-5), line 242. The amount on line 242 is the 2026 projected capital expenditures of \$2,955,500. The Company does not confirm that the project's test year ROM Adjusted capital expenditures amount of \$2,798,522 is not included in Exhibit A-12 (SHB-4), Schedule B-5.1, as I will address later in my response.

The Company confirms the Critical Substation Upgrade projected ROM Adjusted capital expenditures for the test year is \$2,798,533 (\$3,498,167 less 20% ROM Adjustment) as stated on page 33, lines 15 through 19, of my rebuttal testimony. The projected test year capital expenditures before the 20% ROM adjustment is based on eight months of \$2,955,500, Exhibit A-20 (SHB-5), line 242, column j, ($\$2,955,500/12*8 = \$1,970,333$) for the 2026 projected capital expenditures and four months of \$4,583,500, Exhibit A-20 (SHB-5), line 320, column j, ($\$4,583,500/12*4 = \$1,527,833$) for the 2027 projected capital expenditures. The ROM Adjusted Capital for the test year of \$2,798,533 is included in Exhibit A-12 (SHB-4), Schedule B-5.1, line 6.

Witness: Stacy H. Baker

Date: October 29, 2025

Question:

317. Refer to lines 11-13 on page 34 of Ms. Baker's rebuttal testimony on the Data & Analytics Platform Rationalization project moving from the investment planning phase to the Execute phase. Please:

- a. Confirm that in response to DR AG-CE-0595 on September 17, 2025, the project was in the planning phase, as shown on page 4 of Exhibit AG-29. If not confirming, explain why that designation was incorrect.
- b. Explain when between September 17, 2025 and October 21, 2025, the project completed the detailed requirements phase and entered the Execute phase. Explain what "Execute" means regarding this project.

Response:

- a. The Company confirms that in response to Discovery Request No. U-21870-AG-CE-0595 (Exhibit AG-29) on September 17, 2025, the Company indicated that the Data & Analytics Platform Rationalization project was in the Planning phase. Subsequently, the Company identified that project phase had not been properly maintained in the project management system. The project completed the Planning phase August 1, 2025, which is when the detailed requirements were completed and the project moved to the Execute phase.
- b. Refer to part a response for when the project completed detailed requirements and entered the Execute phase. The Execute phase includes the activities to implement, test, perform any data migration, and go-live for a project.

Witness: Stacy H. Baker

Date: October 29, 2025]

Question:

318. Refer to lines 3-14 on page 35 of Ms. Baker's rebuttal testimony on the OT Datacenter Migration project and relocation from the Parnall building. Please:

- a. Confirm that the information on the cost of addressing the aging climate control equipment and water filtration issues was not provided in the direct testimony of Ms. Baker or in response to discovery requests. If not confirming, provide evidence otherwise.
- b. Confirm that page 114 of Exhibit A-21 shows total migration costs for the project are forecasted at \$17.7 million with no cost savings or avoided costs and a Benefit/Cost ratio of negative 1.0. If not confirming, provide evidence otherwise.

Response:

- a. The Company confirms that the information on the cost of addressing the aging climate equipment and water filtration issues was not provided in my direct testimony or responses to discovery request for the Operational Technology (OT) Datacenter Migration project. The Company provided information on the costs of addressing the aging climate control equipment and continuing water infiltration issues on page 35, lines 6 through 14, of my rebuttal testimony.
- b. The Company does not confirm that in Exhibit A-21 (SHB-6), pages 114 and 115, it shows total migration costs for the project forecasted at \$17.7 million. The Funding Summary, on page 114 of Exhibit A-21 (SHB-6), includes the Summary of the Total Cost of Ownership of projected capital expenditures and O&M expenses for each project, including ongoing maintenance, as discussed in my direct testimony, on page 44, lines 7 through 14. In addition, the Funding Summary, on page 114 of Exhibit A-21 (SHB-6), includes the Total Project Costs of projected capital expenditures and O&M expenses for each project, excluding ongoing maintenance, as discussed in my direct testimony, on page 44, lines 15 through 28. The capital expenditures and O&M expenses to migrate the OT datacenter are \$12.2 million.

The Company confirms that no cost savings or avoided costs were identified in Exhibit A-21 (SHB-6), page 114, and the OT Datacenter Migration project has a benefit/cost ratio of negative 1.0.

Witness: Stacy H. Baker

Date: October 30, 2025

Exhibit AG-63

(Baker DR AG-CE-0779 with
Confidential attachment, AG-CE-
0780)

CONFIDENTIAL

Question:

321. Refer to lines 19-23 on page 38 and lines 1-3 on page 39 of Ms. Baker's rebuttal testimony on the current SAP/ERP system being susceptible to cyberattacks if its useful life is extended. Please:

- a. Confirm that the current ERP system is not accessible by outsiders through the internet. If not confirming, explain what direct access outsiders have to the ERP system.
- b. Confirm that the Company has a robust cyber security system in place to prevent cyber-attacks to any of its systems. If not confirming, explain why not.
- c. Confirm that if the Company were to negotiate an extended system support agreement with SAP for the current ERP system, it would include necessary system patches. If not confirming, explain why not.

Response:

- a. The Company confirms that the current ERP system is not accessible by outsiders through the internet.
- b. The Company confirms it has strong cyber-security standards and protections in place to prevent cyber-attacks to any of its computer systems.
- c. The Company does not confirm that if the Company were to negotiate an extended system support agreement with SAP for the current ERP system, it would include necessary system patches. SAP has stated that after maintenance ends, standard patches will no longer be available as indicated on page 106, line 20 through page 107, line 3, of my direct testimony and on page 38, line 23 through and page 39, line 3, of my rebuttal testimony.

Witness: Stacy H. Baker

Date: October 29, 2025

Question:

322. Refer to lines 1-17 on page 40 of Ms. Baker's rebuttal testimony on the current phase of development of the new SAP S/4 HANA ERP system. Please confirm that the Company has not yet selected a vendor to provide the software for the system and has not completed the detailed requirements phase of the project. If not confirming, provide evidence otherwise.

Response:

The Company does not confirm that it has not yet selected a vendor to provide the software for the system. SAP provides the software. Page 103, line 31 through page 104, line 18, of my direct testimony provides the alternatives the Company considered and the alternative selected to migration to SAP's S/4HANA software. The Company confirms that the detailed requirements phase has not been completed.

Witness: Stacy H. Baker

Date: October 30, 2025

Question:

323. Refer to pages 41 and 42 of Ms. Baker's rebuttal testimony on the forecasted capital expenditures for the ARP-FDAM program. Please:

- a. Confirm that the ARP-WAM program is a separate program from the ARP-FDAM program with the capital expenditures for the ARP-WAM presented on page 15 of Exhibit A-22 (SHB-7) and the capital expenditures for the ARP-FDAM presented on page 5 of the exhibit. If not confirming, explain otherwise.
- b. Confirm that the information provided in Exhibit A-185 (SHB-14) was not presented in direct testimony or in response to discovery response AG-CE-0603 (Exhibit AG-31) dated September 17, 2025. If not confirming, provide evidence otherwise.
- c. Explain why the Company cannot purchase the equipment needed and recover any incremental capital expenditures above the amount approved in this rate case in the next rate case to avoid any field equipment availability issues.

Response:

- a. The Company confirms that the ARP-WAM project is a separate project from the ARP-FDAM project with the capital expenditures for the ARP-WAM presented on page 15 of Exhibit A-22 (SHB-7) and the capital expenditures for the ARP-FDAM presented on page 5 of the exhibit.
- b. The Company confirms that the information provided in Exhibit A-185 (SHB-14) was not presented in direct testimony or in Discovery Response No. U-21870-AG-CE-0603 (Exhibit AG-31) dated September 17, 2025. The Company did provide the information in Audit Response No. U21870-SA-CE-008 (Exhibit S-14.1, pages 5 and 6) dated June 25, 2025.
- c. Please see my response to U21870-AG-CE-0772, subpart c. The equipment provided through the ARP-FDAM program is critical to the Company's ability to provide quality service to customers. As discussed on pages 42, line 16 through 43, line 10, of my rebuttal testimony, the absence of field devices for co-workers can significantly impact their ability to perform work effectively and negatively impact the service provided to customers.

Witness: Stacy H. Baker

Date: October 30, 2025

Question:

324. Refer to lines 13-17 on page 10 of Mr. Blumenstock's rebuttal testimony on the forecasted capital expenditures for the Covert power plant, and the statement that the Company did not buy a new plant, and the purchased plant requires periodic maintenance. Please confirm the two projects are not periodic maintenance projects but major capital projects being proposed in addition to long term service agreements (LTSA) with turbine manufacturers and other major maintenance work performed at the plant. If not confirming, explain why the two projects are not capital projects.

Response:

If the two referenced projects in the question are the Station Control System (Netmation) and the Load Commutated Inverter (LCI) Static Frequency Converter (SFC), these are capital projects. These projects are distinct and in addition to the Long-Term Service Agreement (LTSA).

Witness: RICHARD T. BLUMENSTOCK

Date: October 28, 2025

Question:

325. Referring to lines 8-18 on page 11 of Mr. Blumenstock's rebuttal testimony on the forecasted capital expenditures for the Covert power plant and the Company not discovering that the equipment was obsolete until after beginning to operate the plant. Please:
- a. Identify what specific due diligence was performed on the equipment that is being replaced in conjunction with the two projects and why it could not be determined during technical due diligence that it was obsolete.
 - b. Identify what other problems the Company identified once it began to operate the plant that it did not expect from performing technical due diligence prior to the purchase of the plant.
 - c. Provide evidence that the replacement of the equipment being replaced under the two projects has been routinely performed at other Company's natural gas fueled generating facilities. Provide the plant name, unit number, date of the replacement, and the like equipment replaced.

Response:

- a. For the Static Frequency Converter (SFC) project, the Company initially planned to procure critical spare parts—specifically thyristors—from the original equipment manufacturer (OEM) rather than pursue a full system replacement. At that time, quotes were obtained and the parts were intended to be placed in inventory. However, following the purchase, the OEM discontinued both manufacturing and support for these critical components, necessitating the acquisition of a new SFC system. Regarding the Netmation control system, the Company anticipated potential obsolescence risks during the site acquisition and factored those into its planning. Cost assumptions were informed by similar turbine and balance-of-plant (BOP) control system upgrades that had been completed or were planned at the other Company-owned gas facilities.
- b. After assuming ownership, engineering and operations teams gained in-depth familiarity with all critical systems, resulting in additional vulnerabilities being identified. Those additional vulnerabilities led to the development of the current capital investment and O&M maintenance strategy outlined in my testimony.
- c. It is important to note that while the gas units share functional similarities, they are not constructed identically. For the SFC project, comparable upgrades were executed at Zeeland—Phase 2 in 2019 and Phase 1 in 2021. Jackson does not have a similar project, as its startup function is performed by a starter motor rather than an SFC system. For the Netmation systems, Zeeland completed turbine and BOP control upgrades in 2024 and 2025. At Jackson, turbine controls were last upgraded in 2020, with BOP system controls completed in fall 2025.

Witness: RICHARD T. BLUMENSTOCK**Date:** October 28, 2025

Question:

327. Refer to lines 13-23 on page 12 of Mr. Blumenstock's rebuttal testimony on the capital upgrades for the Ludington power plant. Please:

- a. Confirm that the upgrade projects not completed as part of the plant overhaul are not maintenance but major capital projects.
- b. Confirm that the deferral of performing the upgrades past the plant overhaul did not jeopardize the FERC operating license for the plant. If not confirming, provide evidence otherwise.
- c. Explain why the Company would not or cannot replace the equipment to ensure reliability and operation of the plant if the Commission determines that customers should not pay for the cost of the upgrades.

Response:

Objection of Counsel: Consumers Energy Company objects to part b. of this discovery request to the extent that it calls for a legal opinion and on the grounds that the question, as stated is speculative. Consumers Energy objects to part c. of this discovery request on the grounds that it calls for a legal analysis, rather than seeking discoverable facts. Consumers Energy has a constitutional right to rates that are sufficient to recover all of the Company's reasonably and prudently incurred expenses and to earn a reasonable rate of return on all of its reasonably and prudently invested capital to serve public utility customers. Subject to the Company's objection, and without waiving its objection, Consumers Energy responds as follows:

- a. Not confirmed. The upgrade projects discussed in my rebuttal testimony are capital projects, but that does not mean they are not required to maintain the plant.
- b. The Company did not violate its FERC operating license for the plant. However continued conformity with the terms of the Company's FERC operating license requires appropriate ongoing maintenance of the plant, including new capital investments such as the Lower Penstock Expansion Joint ("LPEJ") Chamber Waterstop replacement discussed on pages 91 and 92 of my direct testimony. The referenced portion of my rebuttal testimony explains that ongoing investment and maintenance are critical for safe and regulatory compliant operations.
- c. The Company reasonably and prudently invests in its generation assets for the benefit of its customers. It would be inappropriate to expect the Company to invest in its generation assets for the benefit of its customers but not recover those costs from its customers.

Witness: RICHARD T. BLUMENSTOCK

Date: October 28, 2025

Question:

328. Refer to lines 1-11 on page 13 of Mr. Blumenstock's rebuttal testimony on the capital upgrades for the Ludington power plant. If the upgrades were not necessarily required 15 years ago, what has changed now that the upgrades are necessary to avoid jeopardy with the FERC operating license?

Response:

The condition of the equipment for which the capital expenditures are being requested has degraded over time and it is now necessary to implement these capital projects.

Witness: RICHARD T. BLUMENSTOCK

Date: October 28, 2025

Question:

330. Refer to lines 1-11 on page 14 of Mr. Blumenstock's rebuttal testimony on the capital upgrades for the Ludington power plant. Please confirm that Exhibit A-192 shows the cost of the Dike Load Center project has more than doubled from \$8.9 million to \$20.2 million and the project should have started in 2019. If not confirming, explain.

Response:

Confirmed. The cost of the Dike Load Center project at the Ludington Pumped Storage Plant did increase, and the project began in 2019. During the engineering phase, it was determined that the new load centers would be significantly larger, primarily due to updated arc flash protection requirements. This design change contributed to the cost increase, as detailed on pages 11 and 12 of Exhibit A-192. The project is being executed in a phased approach to minimize impacts on unit availability. Page 14 of Exhibit A-192 shows expenditures beginning in 2019 for engineering and planning activities. The overall project is planned to span 11 years.

Witness: RICHARD T. BLUMENSTOCK

Date: October 29, 2025

Question:

331. Refer to lines 1-16 on page 15 of Mr. Blumenstock's rebuttal testimony on the capital expenditures for the Waste Water Treatment and other projects at the Campbell power plant. Please confirm that in addition to the \$12.4 million for the Waste Water Treatment project the \$17,782,000 includes \$3.7 million for the relocation of the machine shop, and \$1.679 million for other projects, as described on page 98 of Mr. Blumenstock's direct testimony.

Response:

Confirmed. However, the proposed disallowance presented in Mr. Coppola's direct testimony only discussed the Waste Water treatment project and not the \$3.7 million for relocation of machine shop and \$1.679 million for other projects which were supported in my direct testimony. These other projects are unrelated to the Waste Water treatment project.

Witness: RICHARD T. BLUMENSTOCK

Date: October 28, 2025

Question:

332. Refer to lines 1-6 on page 16 of Mr. Blumenstock's rebuttal testimony on the capital expenditures for the Waste Water Treatment at the Campbell power plant. Please confirm that the planning development phase of the project provided by the Company in response to DR AG-CE-0496 was correct. If not confirming, explain why this information was incorrect.

Response:

Confirmed.

Witness: RICHARD T. BLUMENSTOCK

Date: October 28, 2025

Question:

333. Refer to lines 7-23 on page 16 of Mr. Blumenstock's rebuttal testimony on the capital expenditures for the Zeeland spare GSU. Please confirm that the engineering development phase of the project, which ends in December 2025, as provided by the Company in response to DR AG-CE-0496 was correct, indicating that engineering on the project has not yet been completed. If not confirming, explain why this information was incorrect.

Response:

Confirmed.

Witness: RICHARD T. BLUMENSTOCK

Date: October 28, 2025

Question:

334. Refer to page 17 of Mr. Blumenstock's rebuttal testimony on the capital expenditures for the Zeeland Phase II project. Please confirm that the Company can include the capital expenditures in rate base in the next rate case once the project has sufficiently advanced past the planning and engineering phase.

Response:

Confirmed. However, as stated in my rebuttal testimony, there is no sound basis to disallow the project as the project investment will be offset by AFUDC and, as such, the projected capital expenditure has no impact on the revenue requirement.

Witness: RICHARD T. BLUMENSTOCK

Date: October 28, 2025

Question:

335. Refer to page 18 of Mr. Blumenstock's rebuttal testimony on the capital expenditures for the Zeeland Phase I project. Please confirm that Mr. Coppola's proposed disallowance is for the Phase II project and not Phase I. If not confirming, provide evidence otherwise.

Objection by Counsel: Consumers Energy objects to this discovery request on the grounds that it seeks information in the possession of, known to, or otherwise equally available to the Attorney General. The Attorney General's testimony speaks for itself. Subject to the Company's objection, and without waiving its objection, Consumers Energy responds as follows:

Response:

Confirmed.

Witness: RICHARD T. BLUMENSTOCK

Date: October 28, 2025

Question:

336. Refer to lines 1-10 on page 3 of Mr. Guinn's rebuttal testimony on the forecasted capital expenditures for Emergent Repairs. Please confirm that by stating the Commission has accepted emergent repairs in prior rate cases Mr. Guinn means that the forecasted capital expenditures were not litigated (i.e. highlighted and challenged by another party) and the Commission approved those expenditures with other capital expenditures proposed by the Company. If not confirming, provided evidence otherwise with reference to a page number of the Commission order where it specifically approved emergent repairs.

Response:

Capital expenditures for Emergent Repairs have not been contested in prior rate cases and the Commission approved those expenditures.

Witness: Quentin A. Guinn

Date: October 25, 2025

Question:

337. Refer to lines 11-23 on page 3 of Mr. Guinn's rebuttal testimony on the forecasted capital expenditures for the Vehicle Replacement program. Please:
- a. Confirm that in 2024 the Company purchased 313 vehicles and for the projected test year, the Company forecasted purchasing 89 vehicles excluding the Expansion project. If not confirming, provide evidence otherwise.
 - b. Confirm that the number of vehicles forecasted to be purchased matters and should be taken into consideration when forecasting the capital expenditures for the bridge period and projected test year. If not confirming, provide evidence otherwise.

Response:

- a. As detailed in Exhibit A-104 (QAG-5), excluding Fleet Expansion Plan purchases, the Company purchased 313 vehicles during the 2024 historical year and forecasts purchasing 107 vehicles during the test year.
- b. As detailed on page 77 of my direct testimony in this case, while the Company attempts to be as precise as possible in the Fleet Replacement Plan, there is the potential for forecasted variances in that plan due to the nature of the fleet business that includes supply chain challenges (e.g. labor strikes, manufacturer model changes, catastrophic weather events, etc.). The amounts of Fleet Vehicle Capital Replacement Plan spend detailed in Exhibit A-104 (QAG-5), Line 1 is consistent with the "historical plus inflation" methodology outlined on page 3 of my rebuttal testimony in this case. The annual Fleet Vehicle Capital Replacement Plan budget, beginning with the Commission's allowance in Case No. U-20963, is consistent with Exhibit A-104 (QAG-5), Line 1 and is as follows:

<u>Year</u>	<u>Fleet Vehicle Replacement Plan Budget (\$000)</u>
2021 - Commission Allowance in Case No. U-20963	17,943
2022 Inflation Factor	3.70%
2022 Fleet Vehicle Replacement Plan Budget	18,607
2023 Inflation Factor	2.30%
2023 Fleet Vehicle Replacement Plan Budget	19,035
2024 Inflation Factor	2.20%
2024 Fleet Vehicle Replacement Plan Budget	19,454
2025 Inflation Factor	2.20%
2025 Fleet Vehicle Replacement Plan Budget	19,882

Witness: Quentin A. Guinn

Date: October 27, 2025

Question:

340. Refer to lines 13-16 on page 23 of Mr. Kelly's rebuttal testimony on the OHUG conversion program of 50 miles for the projected test year. Please confirm that the 50 miles for the projected test year is only the start of the program and the Company intends to significantly increase the number of OHUG conversions in future years if the Commission approves the cost template and criteria proposed in this rate case. If not confirming, provide evidence otherwise.

Response:

The Company has outlined its plan to expand underground conversions beyond the 50 miles shown in the projected test year. This plan is outlined in Exhibit A-129 (MPK-19) on Pages 78-79. The Company will not be expanding underground conversions in future years based on approval in the instant case, but rather, it will seek approval of its expansion in future rate cases.

Witness: Michael P. Kelly

Date: October 29, 2025

Question:

341. Refer to lines 16-22 on page 23 of Mr. Kelly's rebuttal testimony on the OHUG conversion program and the Commission statement about the Company including the BCA as part of the OHUG conversion program analysis. Confirm that the Company has interpreted the language in the Commission order to be only a one-time Benefit Cost Analysis (BCA) instead of a repetitive screening analysis before selecting projects for conversion to undergrounding. If not confirming, explain.

Response:

Confirmed, the Company does not interpret the statement to mean a repetitive screening analysis before selecting every project. The Company has developed a systematic approach for the selection of projects that meet the goals outlined in the BCA conveyed in the instant case. As for the one-time nature of the analysis, the Company is not opposed to evaluating the undergrounding program based on future changes in actual costs given Commission guidance.

Witness: Michael P. Kelly

Date: October 29, 2025

Question:

344. Refer to Exhibit A-221 sponsored by Mr. Kelly with rebuttal testimony and DR AG-CE-0514 included therein. Please provide the number of units or work orders for each year 2020 to 2024 and the number of hours in Excel to match the information provided in the table at the bottom of page 1 of the discovery response. Provide also the same information for year-to-date September for both 2024 and 2025 by month.

Response:

Please refer to Attachment 1 to this response.

Witness: Michael P. Kelly

Date: October 29, 2025

21870-AG-CE-0830

Attachment 1

Type	2020 Actual	2021 Actual	2022 Actual	2023 Actual	2024 Actual
Units	31,468	34,129	35,273	37,170	37,128
Hours	23,427	24,688	27,185	24,934	24,569

Date	JAN 24	FEB 24	MAR 24	APR 24	MAY 24	JUN 24	JUL 24
Units	3,026	2,466	2,650	3,174	3,258	3,523	3,409
Hours	2,048	1,442	1,671	2,065	2,177	2,094	2,542

Date	JAN 25	FEB 25	MAR 25	APR 25	MAY 25	JUN 25	JUL 25
Units	2,328	1,925	2,756	4,537	4,458	3,365	3,597
Hours	1,603	1,842	2,025	2,372	2,531	2,751	2,782

AUG 24	SEP 24	OCT 24	NOV 24	DEC 24	TOTAL
3,311	3,204	3,893	2,695	2,519	37,128
2,026	2,076	2,479	2,084	1,865	24,569

AUG 25	SEP 25	TOTAL
3,412	3,357	29,735
2,875	2,665	21,444

Question:

345. Refer to lines 9-19 on page 28 of Mr. Kelly's rebuttal testimony on the calculation of the O&M expense for the Service Calls subprogram. Please confirm that the Company used the number of hours multiplied by the labor rate to arrive at the O&M expense for the projected test year and not the number of units or work orders times some other cost rate. If not confirming, explain fully and provide the calculation for the O&M expense forecast in Excel.

Response:

The Service Calls O&M forecast is based on a number of work hours multiplied by the labor rate, but those work hours are in turn based on a number of work orders, as was described in my direct testimony and as outlined in Exhibit A-221 (MPK-31).

Witness: Michael P. Kelly

Date: October 29, 2025

Question:

346. Refer to Exhibit A-219 sponsored by Mr. Kelly with his rebuttal testimony. Please provide the same information on lines 1 and 2 by month for years 2023 and 2024 in Excel.

Response:

Please refer to Attachment 1 to this response.

Witness: Michael P. Kelly

Date: October 29, 2025

21870-AG-CE-0832

Attachment 1

	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual
Month/Year	January 2023	February 2023	March 2023	April 2023	May 2023	June 2023	July 2023	August 2023	September 2023	October 2023	November 2023	December 2023
	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
2.01 Lines Reliability - LVD	132,662.83	91,459.31	27,786.02	26,688.68	12,853.24	18,840.34	52,602.97	5,706.33	56,135.81	56,905.12	73,241.48	96,214.98
2.04 Substations Reliability - LVD	278,980.89	78,166.71	229,237.31	215,883.28	214,347.02	330,958.82	325,770.02	271,282.65	336,789.91	388,048.14	240,777.18	189,583.98

21870-AG-CE-0832

Attachment 1

	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual
Month/Year	January 2024	February 2024	March 2024	April 2024	May 2024	June 2024	July 2024	August 2024	September 2024	October 2024	November 2024	December 2024
	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
2.01 Lines Reliability - LVD	105,137.02	102,452.69	62,316.68	-41,550.80	40,529.48	43,882.77	50,958.03	40,149.25	88,383.38	40,034.91	30,514.90	16,764.88
2.04 Substations Reliability - LVD	175,299.19	231,649.24	271,810.48	270,936.00	441,072.82	410,319.53	350,656.61	379,867.95	416,509.76	326,787.34	157,190.47	132,767.57

Question:

347. Refer to lines 1-5 on page 30 of Mr. Kelly's rebuttal testimony on Grid Automation work. Please:

- a. Identify what Grid Automation work is driving the LVD Electric Distribution subprogram O&M expense.
- b. Confirm that in his direct testimony Mr. Coppola has proposed cutbacks to the Company's forecasted capital expenditures for Grid Automation.

Response:

- a. In Company Witness Scott McPhail's direct testimony, the projects listed below are described in more detail. The table below is O&M expense associated with the projects listed in his testimony.

Grid Automation O&M (\$000)	Bridge Period (Jan '25 - Apr '26)	Test Year (May '26 - Apr '27)
Line Sensors	920	690
Voltage Regulator Controllers	400	250
Distribution Circuit Modernization (except Line Sensors and Voltage Regulator Controllers)	63	45
Substation Modernization	220	70
Distribution Asset Management	845	375
Load Flow Tool Upgrade	240	180
Fault Location Isolation and Service Restoration (FLISR)	500	450
Weather Stations	29	115

- b. In his direct testimony, Mr. Coppola has proposed disallowances in Line Sensors, Voltage Regulator Controllers, Distribution Asset Management, and Metro Modernization (which is a portion of Distribution Circuit Modernization).

Witness: Michael P. Kelly

Date: October 30, 2025

Question:

348. Refer to lines 11-24 on page 10 and lines 1-9 on page 11 of Ms. Partlan's rebuttal testimony on LVD Lines New Business subprogram. Please:
- a. In response to DR AG-CE-0335a, the Company stated "The Company has undertaken a cross-functional unit cost reduction effort for new service connections. This has included detailed design reviews, ensuring material availability, and improving labor hour planning for both contractors and Company crews. By using digital forecasting tools, the Company has improved operational precision and cost effectiveness in this area." Is the Company retracting this response? If yes, why?
 - b. In response to DR AG-CE-0334b, the Company stated, "The Company expects that customers will increasingly opt for underground services given their greater aesthetic appeal and their better reliability, because the proposed installation fees mean that underground services and overhead services will cost the same amount to the customer." Is the Company retracing this response? If yes, why?

Response:

- a. No, the Company is not retracting this response. The Company remains committed to reducing unit costs where possible as outlined in discovery response 21870-AG-CE-0335. However, the upward pressures on unit costs also continue to exist, which has resulted in a net increase in unit costs from 2024 into the bridge period and test year.
- b. No, the Company is not retracting this response, and it is not clear why it would based on what is stated on page 10, line 11, through page 11, line 9 of my rebuttal testimony. The Company continues to expect that more customers will opt for an underground service.

Witness: Jennifer M Partlan**Date:** October 29, 2025

Question:

349. Refer to lines 16-18 on page 12 of Ms. Partlan's rebuttal testimony on LVD Asset Relocation subprogram and the 3.2% growth rate from 2020 through 2023. Please confirm that by using the three-year average number of units from 2022 to 2024, Mr. Coppola has captured the most recent growth in the number of units. If not confirming, provide evidence otherwise.

Response:

The equation given on page 34 of my direct testimony (referred to on page 12 of my rebuttal testimony) is not based on growth in units, but instead based on growth in capital expenditures.

Aside from that, I would not agree that Mr. Coppola has captured the most recent growth rate in the number of units. On page 20, lines 6 and 7, of his direct testimony, he identifies that the Company's average number of units from 2022 through 2024 was 2,369. On page 20, lines 12 and 18, he takes that 2,369 and uses it to determine his proposed spending levels. He prorates the proposed amount for the bridge period by multiplying 2,369 by 16/12, but otherwise has not accounted for any continued growth rate. His proposal is based on the recent average level simply remaining flat.

Witness: Jennifer M Partlan

Date: October 29, 2025

Question:

351. Refer to lines 19-22 on page 12 and page 13 of Ms. Partlan's rebuttal testimony on LVD Asset Relocation subprogram and Make-Ready capital expenditures forecast. Please:
- a. Confirm that based on the revised 3,728 units provided by the Company on page 1 of Exhibit A-225 for the bridge period, the unit cost is \$12,295. If not confirming, provide evidence otherwise.
 - b. Confirm that based on the unit cost \$12,295 multiplied by the 3,267 units calculated by Mr. Coppola on page 22 of his direct testimony, the forecasted capital expenditures for the bridge period are \$40,168,000 instead of \$19,455,000. If not confirming, provide evidence otherwise.
 - c. Confirm that the revised \$40,168,000 capital expenditures for the bridge period are \$5,669,000 lower than the \$45,837,000 forecasted by the Company. If not confirming, provide evidence otherwise.

Response:

- a. Correct. $\$45,837,000 \div 3,728 = \$12,295$.
- b. It is correct that multiplying \$12,295 by 3,267 would result in a product of \$40,168,000. However, as I explained in my rebuttal testimony based on the information provided in Exhibit A-225 (JMP-5), the Company's projection of 3,728 bridge period units should be used rather than Mr. Coppola's recommendation of 3,267.
- c. It is correct that the difference between \$45,837,000 and \$40,168,000 is \$5,669,000.

Witness: Jennifer M Partlan**Date:** October 29, 2025

Question:

353. Refer to lines 8-23 on page 15 of Ms. Partlan's rebuttal testimony on the voltage conversion capital expenditures forecast. Please:

- a. Identify what accounts for the difference of 118 units between the 165 and 283 units.
- b. With 165 units forecasted for 2026 and 2027, explain and show in Excel how you arrived at 283 units for the projected test year.
- c. Is the Company front-loading forecasted units for the projected test year? If yes, explain why.
- d. Provide the number units completed by month for each year 2022 through 2024 and forecasted for 2025, 2026, and 2027 in Excel.

Response:

- a. 118 is simply the mathematical difference between 283 and 165, with no other significance. As given in Figure 35 of my direct testimony and as supported by Exhibit A-167 (JMP-2), page 2, the Company's test year plan as filed included 283 miles, and the Company's test year projection in the instant case should be evaluated based on that number. Discovery response 21870-AG-CE-0346 showed 165 miles for the 2026 and 2027 calendar years, but this should not be translated into 165 miles for the test year, which does not align with a calendar year.
- b. The Company arrived at 283 miles for the test year because that is the total line mileage of the Company's test year workplan that was provided in Exhibit A-167 (JMP-2), page 2, which was provided in Excel format. The Company's test year workplan was developed as it is presented in that exhibit, not by taking calendar year plans and subdividing them. That said, the 165 miles planned for 2026 are solely in the test period; the Company intends to complete planning work in the first quarter of 2026 so that project execution can begin in the test year.
- c. See part b.
- d. The Company does not have monthly totals of units completed for voltage conversion work. The Company does not track the number of miles of voltage conversions completed on a monthly basis, and would not be able to recreate estimates of historical monthly totals without reviewing numerous individual work orders, and even that would require estimates to be made based on various assumptions. For future periods, the Company does not forecast monthly totals of unit completion. The Company has forecast the amount of work to be completed in the bridge period and test year, but has not broken this down on a monthly basis.

Witness: Jennifer M Partlan

Date: October 30, 2025

Question:

354. Refer to lines 14-18 on page 16 of Ms. Partlan's rebuttal testimony on underground cable rejuvenation units. Please explain why the Company changed the presentation of units between Figure 35 in your direct testimony and the information presented in DR AG-CE-0346 (Exhibit AG-1).

Response:

Although the Company has, in the last few rate cases, developed a repository of historical unit costs (and presented them in this case as Exhibit A-130 (MPK-20)), it had not done so for underground cable rejuvenation. In responding to discovery request 21870-AG-CE-0346, the Company was able to identify historical projects for this work. Since then, the Company has been able to identify the historical miles, which were presented in Table 3 of my rebuttal testimony.

Witness: Jennifer M Partlan

Date: October 30, 2025

Question:

355. Refer to lines 13-22 on page 18 of Ms. Partlan's rebuttal testimony on the undergrounding criteria. Please:

- a. Identify what lessons were learned from the pilot that drove the changes in the selection criteria, such as the removal of the CAIDI criteria and areas with heavy tree density.
- b. Explain why a long-term selection criterion should be based on recent events.

Response:

- a. The Company's rationale for changing the criteria on the number of customers in the zone and on tree density vs. tree-caused outages is provided on page 18, lines 17 through 22, of my rebuttal testimony. The criterion of having CAIDI of at least 600 was removed because a circuit could have a CAIDI below that level but still suffer from a high frequency of outages, in which case undergrounding would still provide substantial benefit.
- b. I do not believe that the Company is strictly basing long-term selection criteria on recent events. In a given year, some of the criteria will reflect recent history (e.g., the requirement for at least one outage in the last 24 months) but the underlying principle (e.g., that circuits with recent reliability issues should be prioritized) is much longer established. At the same time, modest adjustments to criteria will necessarily be based on the most recent available evidence, which tends to be the most relevant.

Witness: Jennifer M Partlan

Date: October 29, 2025

Question:

356. Refer to lines 1-18 on page 20 of Ms. Partlan's rebuttal testimony on LVD Lines Capacity subprogram. Please:

- a. Confirm that Mr. Coppola did not state in his direct testimony that assets categorized by the Company below 145% overload are low risk but that the Company was making capital expenditures on lower risk assets and deferring work on higher risk projects rated at overload of 145% or greater. If not confirming, provide evidence otherwise.
- b. If lower overload assets have higher risk than higher overload assets what is the distinguishing factor that creates a higher risk?

Response:

- a. While it is true that Mr. Coppola did not state that assets below 145%¹ overload are "low risk," he did state on page 38, line 17, of his direct testimony that projects overloaded at less than 140% are in a "less risky" category, and the referenced part of my rebuttal testimony is directed at this.
- b. Each component has its own emergency loading capability as well as its own tolerance for how long it can operate in that emergency rating. The percentages vary among component types. A fuse link can withstand a certain percent overload of a certain duration before the link melts completely due to loading, whereas an isolator tends to fail once it hits a certain percent overload. Isolators are the highest-risk component on the LVD system when it comes to overload prevention. This risk could cause catastrophic failure of the isolator when overloaded, resulting in an unplanned outage. An isolator replacement is more complex than replacing a melted fuse or failed recloser or even putting up a span of wire that came down. Therefore, an isolator failure tends to lead to a long duration outage and higher CAIDI for affected customers.

Witness: Jennifer M Partlan

Date: October 30, 2025

¹ Note that, while this discovery request uses 145%, both Mr. Coppola's direct testimony and my rebuttal testimony use 140% as the relevant cutoff. My rebuttal testimony refers to a 145% overload on one occasion as a hypothetical example, not as a risk threshold cutoff.

Question:

357. Refer to lines 3-6 on page 23 of Ms. Partlan's rebuttal testimony on avoided customer minutes interruptions from work reducing repetitive outages. Please confirm that pages 4 through 8 of Exhibit AG-10 include projects listed in Exhibit A-169 for the bridge period and not projects completed in 2023 and 2024.

Response:

Exhibit AG-10, pages 4 through 8, does list projects proposed for the bridge period in the instant case. However, this is based on what was filed in Exhibit A-166 (JMP-1). Page 23, lines 3 through 6, of my rebuttal testimony is providing clarification about the contents of Exhibit A-169 (JMP-4) which does have to do with projects completed in 2023 and 2024.

To the extent that page 46, line 5 through page 47, line 3, of Mr. Coppola's testimony is not addressing Exhibit A-169 (JMP-4), the point made on page 23, line 6 of my rebuttal testimony still stands. Repetitive Outage projects proposed for the bridge period may be based on outages from 2021 or 2022, even if there were no outages on the circuit in question in 2023 or 2024.

Witness: Jennifer M Partlan

Date: October 29, 2025

Question:

358. Refer to lines 1-9 on page 10 of Ms. Hayward's rebuttal testimony on Allis Chalmers transformers and Mr. Coppola's proposal to spread the replacement of the remaining units over four years. Please state whether the Company evaluated this option of spreading the replacement over four years before rejecting Mr. Coppola's proposal. If yes, provide a copy of the analysis.

Response:

The Company has not performed such an analysis.

Witness: Megan L. Hayward

Date: October 29, 2025

Question:

359. Refer to lines 10-17 on page 10 of Ms. Hayward's rebuttal testimony on Allis Chalmers transformers and the disallowances for the bridge period proposed by Mr. Coppola allegedly conflicting with the Commission order in Case No. U-21585. Please confirm that any conflict of current disallowances for the bridge period and the capital expenditures in the projected test year in Case No. U-21585 could be the result of the Company filing annual rate cases with overlapping periods and before the previous case's projected test year has been concluded. If not confirming, provided evidence otherwise.

Response:

Objection of Counsel: Consumers Energy Company objects to this discovery request to the extent it calls for a legal conclusion. Consumers Energy further objects to this request on the grounds that the request calls for speculation. Subject to this objection, and without waiving it, Consumers Energy answers as follows:

The Company's rate case proceeding is to establish just and reasonable rates, and the reasonableness of the Company's Allis Chalmers transformers spending is included in that review. The Company's rate case includes bridge year spending, incorporated from the last rate case. The Company has shown that it is on track to spend the amount approved.

Witness: Megan L. Hayward

Date: October 29, 2025

Question:

360. Refer to lines 4-13 on page 11 of Ms. Hayward's rebuttal testimony on LVD Substations Rehabilitation. Please:

- a. Confirm that a three-year average includes the high and low project costs within that period.
- b. Explain why the Company is forecasting projects for the projected test year that cost more than double the bridge period unit cost.

Response:

Objection of Counsel: Consumers Energy Company objects to this discovery request because...

- a. A three-year historical average would, mathematically speaking, account for the high and low costs over that historical period. However, the Company's projected costs are not based on historical unit costs. The point of page 11, lines 4 through 13, of my rebuttal testimony, is that unit costs should not be used for this investment category in the first place. Projected costs are developed for project-specific work scopes, and this is the basis of the Company's projected spending.
- b. As stated in my rebuttal testimony and recapitulated in subpart a above, unit costs are not an accurate means of evaluating project costs in this investment category. Projects in the test year are more expensive than projects in the bridge period; this is why the calculated unit cost is higher. Additionally, a number of projects span multiple years, and projects do not necessarily have uniformity of cost across the duration of the project, meaning spending on a given project may be relatively lower in one year and relatively higher in the next.

Witness: Megan L. Hayward

Date: October 29, 2025

Question:

362. Refer to lines 4-14 on page 13 of Ms. Hayward's rebuttal testimony on LVD Substations Capacity and the request for the Company to identify what problems are being addressed. Does the Company not consider overload levels to be a problem? If not, explain why.

Response:

Yes, the Company considers overload levels to be a problem. They are one of the primary problems that the LVD Substations Capacity sub-program is meant to address. If they are not addressed, overloads result in equipment failure and customer outages.

Page 13, lines 4 through 14, of my rebuttal testimony are addressing page 52, lines 5 through 12, of Mr. Coppola's direct testimony. There, Mr. Coppola's stated issue is that the Company did not identify the specific overload levels experienced, which I would interpret to mean some kind of quantitative load level. The point of this section of my rebuttal testimony is that neither the Attorney General nor any other party ever sought this specific information. Discovery request 21870-AG-CE-0477, to which Mr. Coppola refers in this part of his direct testimony, only sought "what problems are being addressed" in a generic fashion, and the Company's response answered the question that was asked.

Witness: Megan L. Hayward

Date: October 29, 2025

Question:

365. Refer to lines 15-23 on page 18 of Ms. Hayward's rebuttal testimony on HVD Substation Reliability and the statement that it is not true that the Company did not provide specific explanations to replace more circuit breakers. Does Ms. Hayward believe that 7 lines of testimony on pages 62 and 63 with broad statements about asset health is specific explanation and support for the \$20 million of spending in the bridge period and \$23.7 million for the projected test year?

Response:

Yes. My direct testimony explains that the Company needs to replace circuit breakers in HVD substations due to their advanced age and deteriorated asset health, their poor performance, and limited availability of parts. Additionally, my project list exhibits, Exhibits A-109 (MLH-3) and A-110 (MLH-4), identify the specific locations of the circuit breakers to be replaced.

Witness: Megan L. Hayward

Date: October 29, 2025

Question:

367. Refer to lines 1-14 on page 21 of Ms. Hayward's rebuttal testimony on the projects in the early phase of development. Please:

- a. Confirm that Exhibit AG-13 should be AG-14. If not confirming, provide evidence otherwise.
- b. Confirm that only the Alma project refers to "property acquisition on going" with no related amount for any property acquisition costs. If not confirming, provide evidence otherwise.

Response:

- a. Yes, this should be Exhibit AG-14.
- b. The Alma Substation Rebuild (Armory) status includes on-going property acquisition, has initiated engineering design, and has initiated procurement of long-lead material. Projected spending in the bridge period is to support the property purchase, design, and procurement. However, the Alma project is not the only project for which property acquisition is ongoing, as the Blackstone Substation Rebuild status also includes on-going property acquisition, continuation of engineering design, and continued procurement of long-lead material. Projected spending in the bridge period is to support the property purchase, design, and procurement.

Witness: Megan L. Hayward

Date: October 29, 2025

Question:

373. Refer to lines 13-22 on page 24 of Ms. Hayward's rebuttal testimony on the HVD Strategic customers not actually posing a high risk. Please confirm that the high risk posed by these customers is demonstrated by the cancellation of the customer project described on page 140 of Ms. Hayward's direct testimony and further described in DR AG-CE-0479 where the Company incurred \$11,580,467 of capital expenditures on a cancelled project and has not yet collected any money from the prospective customer. If not confirming, provide evidence otherwise.

Response:

I cannot confirm this statement. Page 64, lines 5 through 15, of Mr. Coppola's direct testimony states in full:

"Second, even after the project is completed and the customer begins operations there is still a high degree of risk that the customer may cease operations or decide to move to another state. This poses the risk of stranded assets that the Company will likely want to continue to recover from the rest of its customer base. These large strategic customer projects typically involve single customer dedicated substations, power lines, and related facilities at costs exceeding tens of millions of dollars. Although some of the equipment can be salvaged and reused on other future projects, the remaining costs, plus the cost of teardown and transportation can still be large. Often the Company does not obtain a contribution in aid of construction (CIAC) under its economic development tariff (LEDR). Although the contract may provide for some make-whole payments, those provisions may prove worthless if the customer goes out of business."

Page 24, line 17, through page 23, line 4 of my rebuttal testimony is in response to this paragraph from Mr. Coppola. Mr. Coppola's concern here is pertaining to customers, even after a project is completed and in operation, going out of business or relocating to another state. My testimony explains why there is not a high risk of this, as asserted. The referenced \$11,580,467 relates to a project that was cancelled before completion or going into operation.

Witness: Megan L. Hayward

Date: October 29, 2025

Question:

374. Refer to lines 14-23 on page 2 of Mr. McPhail's rebuttal testimony on Line Sensors. Please:

- a. Provide the previous amounts spent on RAMP and AMPLE software between 2020-2024, specifying the year and amount spent.
- b. Provide the amount actually spent on the two software suits in 2025.
- c. Provide the basis for the forecasted cost of \$3.1 million and \$2.083 million.

Response:

- a. Please see Figure 5 on page 20 of my direct testimony for the previous amounts spent on RAMP and AMPLE software between 2020-2024. The dollar amounts for RAMP did not include all line sensors in 2023 and 2024; it was not until 2025 when all line sensors have the added capabilities provided by RAMP.
- b. The Company spent \$5,354,901 in 2025 for both RAMP and AMPLE software.
- c. The Company's original software license expired on March 30, 2025. During negotiations this year, the Company entered into a short-term agreement such that the line sensor and RAMP benefits would continue until a license agreement was reached. Based on discussions prior to and during negotiations with the vendor, the Company expected to spend \$3.1 million on RAMP and \$2.083 million on AMPLE software.

Witness: Scott A. Mcphail

Date: October 30, 2025

Question:

375. Refer to lines 19-23 on page 9 of Mr. McPhail's rebuttal testimony on the Asset Performance Management system development. Please confirm that despite its scalability the project is still in the planning phase. If not confirming, provide evidence otherwise.

Response:

Yes, Asset Performance Management (APM) is in a planning phase, where several foundational activities have been completed to support future development. Within the planning phase, the Company is engaged in design validation for the APM framework, which includes a mock scenario using one asset to evaluate the descriptive data that is the basis of the asset before executing a scalable APM. This necessary planning work currently underway will aid in further scaling the APM by first learning from this scenario so the rest of the in-scope assets can be built most efficiently. Additionally, the Asset Repository architecture has demonstrated scalability potential, with plans to be used as the interface for APM. Because the AR will help serve as the user interface, that further highlights the interdependence of the APM and why DistAM should be treated as a whole.

Witness: Scott A. Mcphail

Date: October 30, 2025

Question:

376. Refer to lines 1-15 on page 12 of Mr. McPhail's rebuttal testimony on the Metro Modernization project. Please:

- a. Confirm that on page 40 of his direct testimony, Mr. McPhail describes this project as an evaluation of new technology that may be used in the workplace for metro modernization projects. If not confirming, explain further.
- b. If this is an evaluation project, why are costs being capitalized and not expensed?
- c. Provide the total hours of exposure to which the 185 hours of reduction relate.
- d. Explain how the technology improves reliability through remote operations and also improves safety.

Response:

- a. Metro Modernization will evaluate new technology not already on the Consumers Energy system. On page 41 lines 12-16 of my direct testimony a more detailed description is provided on the specific use cases.
- b. This initial field deployment will purchase and install grid equipment at a live underground metro vault, no different than other grid assets (e.g. Reclosers, Regulators, Sensors, etc.).
- c. The total hours of exposure will be reduced for Company Line Workers in an underground vault to conduct switching due to an outage or planned work. See Exhibit A-151 (SAM-10) tab "Assumptions & Calculations" cell B83. Currently, Line Workers spend approximately 2,000 hours in an underground vault.
- d. The reliability benefits are described on page 42 lines 10-20 of my direct testimony and provided in Exhibit A-151 (SAM-10). The safety benefits are outlined in Exhibit A-151 (SAM-10) and reiterated in my rebuttal testimony page 12 lines 9-11.

Witness: Scott A. Mcphail

Date: October 29, 2025

Question:

377. Refer to page 3 of Ms. Jerore's rebuttal testimony on the Integrated Energy Management Platform Optimization IT project. Please:

- a. If the project is necessary and the Company is confident about its development and value, why does it not advance the development and request recovery of related capital expenditures incurred in the next rate case?
- b. Confirm that the project's Benefit/Cost ratio is negative 1.0, indicating no identified financial benefits, as shown on pages 62-63 of Exhibit A- 21. If not confirming, provide evidence otherwise.

Response:

- a. The Company is waiting for the cost to be approved for this project before proceeding to mitigate the risk of disallowance and potential write-off that has occurred with some IT projects in the past.
- b. The Company confirms that Integrated Energy Management Platform Optimization project has a benefit/cost ratio of negative 1.0. However, the correct pages that should be referenced in Exhibit A-21 (SHB-6) are pages 101 and 102. I do not agree that the negative 1.0 benefit/cost ratio means that there are no identified financial benefits. There are unquantified benefits to consider, as described on page 102 of Exhibit A-21 (SHB-6).

Witness: Stacy H. Baker

Date: October 30, 2025

Question:

378. Refer to lines 12-23 on page 2 of Mr. Snider's rebuttal testimony on the Service Restoration expense and the Liberty Group Report. Please confirm that the Liberty Report did not describe or propose the same methodology and calculation proposed by the Company in this rate case or any other specific methodology. If not confirming, provide evidence otherwise.

Response:

Confirmed in part. Liberty did not propose the exact method the Company proposes in this case to re-baseline restoration budgeting; in fact, Liberty did not propose *any* specific method. Liberty's Report, Part II, pages 117-118. Above all else, Liberty made it clear that "reliance on five-year historical costs to establish restoration budgets should end," as the Company has proposed. Liberty's Report, Part II, page 117. Liberty recognized that there is more than one way to recovery restoration costs when it said, "*Regardless of the means by which Consumers recovers restoration costs from customers or their amounts, realistic budgeting is essential to sound management . . .*" Liberty's Report, Part II, page 117. "Realistic budgeting" was at the heart of Liberty's recommendation, and realistic budgeting is what the Company has proposed in this case by relying on the most recent year of historical data available and adjusting for inflation. For further details on the interplay between the Company's proposal and Liberty's conclusions and recommendations, please see my direct testimony on page 19, lines 4-14, which discusses how the Company's Service Restoration proposal is responsive to concerns raised by the Liberty Group. Also see page 20, lines 1-25 which explains the Company's test year O&M methodology and critique of the 5-year historical average by the Liberty Group.

Witness: ANDREW R SNIDER

Date: November 3, 2025

Question:

379. Refer to lines 1-10 on page 3 of Mr. Snider's rebuttal testimony on the Service Restoration expense. Please provide the detailed calculation for the \$165.2 million proposed expense in Excel with all supporting data and formulas intact.

Response:

Please see Excel document "AG Discovery - 21870-AG-CE-0884.xlsx"

Witness: ANDREW R SNIDER

Date: November 3, 2025

Last Updated: 2/17/2025

U21870-AG-CE-0884_Snider_ATT_1

Actuals Revised to Exclude Insurance Recovery

	2024	Inflated 2025	Inflated 2026	8 Mths 2026	2027 Inflated Annually	4 Mths 2027	Total Test Year 2026-2027
Business Expense	\$994,773	\$1,015,663	\$1,040,039	\$693,359	\$1,065,000	\$355,000	\$1,048,359
Contractor	\$48,654,952	\$49,676,706	\$50,868,947	\$33,912,631	\$52,089,801	\$17,363,267	\$51,275,898
Exempt Labor	\$11,770,519	\$12,017,700	\$12,306,125	\$8,204,083	\$12,601,472	\$4,200,491	\$12,404,574
Material	\$5,540,971	\$5,657,332	\$5,793,108	\$3,862,072	\$5,932,142	\$1,977,381	\$5,839,453
Non Exempt Labor	\$2,518,780	\$2,571,674	\$2,633,394	\$1,755,596	\$2,696,596	\$898,865	\$2,654,462
OM&C Labor*	\$40,130,770	\$41,334,694	\$42,574,734	\$28,383,156	\$43,851,976	\$14,617,325	\$43,000,482
Other Expense	\$22,736,935	\$23,214,411	\$23,771,557	\$15,847,705	\$24,342,074	\$8,114,025	\$23,961,729
Other Labor	\$23,750,385	\$24,249,143	\$24,831,123	\$16,554,082	\$25,427,070	\$8,475,690	\$25,029,772
Grand Total	156,098,086	\$159,737,322	\$163,819,026	\$109,212,684	\$168,006,131	\$56,002,044	\$165,214,728
2025 Per Month		\$13,311,443.54					
2026 Per Month			\$13,651,585.53				
10 Months 2025		\$133,114,435.39					
2 Months 2026			\$27,303,171.06				
Bridge Year March 2025 - Feb 2026			\$160,417,606.45				

Inflation Rates		
Other Labor	3.2%	103.2%
OM&C Labor	3.0%	103.0%
2025	2.1%	102.1%
2026	2.4%	102.4%
2027	0.8%	100.8%
2027	2.4%	102.4%

Updated 12/12/24
 4 month proration of 2.4% annual factor
 Annual factor

Question:

383. Refer to lines 20-24 on page 9 of Mr. Snider's rebuttal testimony on the Control/Dispatch Centers. Please confirm that the transfer of control to Grand Rapids occurred without any problems.

Response:

Yes, the transfer of Work Management and Dispatch operations to the Grand Rapids Control Center was completed without any technical issues. The Distribution Control Center (DCC) was already operating from Grand Rapids at the time. The System Control Center (SCC) and Lead System Control (LSC) teams sheltered in place during the event, consistent with Company procedures for short-duration weather-related incidents.

Witness: ANDREW R SNIDER

Date: November 3, 2025

Question:

384. Refer to lines 1-7 and lines 18-22 on page 9 of Mr. Snider's rebuttal testimony on the Control/Dispatch Centers. Please explain whether the Company encountered resistance or significant negative feedback from its employees in Grand Rapids or other areas to the previous consolidation plan, which resulted in the Company's latest proposal.

Response:

Objection of Counsel: Consumers Energy Company objects to this discovery request as vague. The term "resistance" is particularly ambiguous, as resistance can occur in many forms and is not defined in the question. Subject to this objection, the Company answers the question below.

Yes, the Company received negative feedback following the April 23, 2023 announcement to consolidate operations into a single Control/Dispatch Center in Jackson. Feedback came through one-on-one conversations and engagement surveys, primarily from Grand Rapids employees impacted by role changes and relocation.

Witness: ANDREW R SNIDER

Date: November 3, 2025

Question:

386. Refer to page 2 of Mr. Vanblarcum's rebuttal testimony on Accrued Income Taxes. Please confirm that the Company calculated deferred income taxes on forecasted capital expenditures and other tax/book income differences through the end of the projected test year ending April 2027 but did not calculate any Accrued Income tax liability past December 2024 other than reducing the liability for \$30.04 million for taxes due. If not confirming, provide evidence otherwise.

Response:

Cannot confirm. The Company calculated deferred income taxes on forecasted capital expenditures and other tax/book income differences through the end of the projected test year ending April 2027. As shown on Exhibit No. A-229 (BJV-4), the Company also calculated accrued income tax liability for Federal, State and Local through the end of the projected test year ending April 2027.

Witness: Brian J. VanBlarcum

Date: November 3, 2025

Question:

387. Refer to lines 1-6 on page 3 of Mr. Vanblarcum's rebuttal testimony on Accrued Income Taxes. Please:

- a. Confirm that the amount recorded to Accrued Income Taxes is not part of the four-points tax synchronization required by the Internal Revenue Code. If not confirming, provide evidence otherwise.
- b. Confirm that in the rate filing the Company calculated tax expense related to the pre-tax income for the projected test year inclusive of the revenue from the rate increase requested in this rate case but did not calculate and include Accrued Taxes related to that tax expense in working capital for the projected test year. If not confirming, provide evidence otherwise.

Response:

- a. Cannot confirm. Internal Revenue Code Section 168(i)(9)(B)(ii) states, "The procedures and adjustments which are to be treated as inconsistent for purposes of clause (i) shall include any procedure or adjustment for ratemaking purposes which uses an estimate or projection of the taxpayer's tax expense, depreciation expense, or reserve for deferred taxes under subparagraph (A)(ii) unless such estimate or projection is also used, for ratemaking purposes, with respect to the other 2 such items and with respect to the rate base."

Accrued Income Taxes are a liability included in working capital and part of rate base.

- b. Confirmed.

Witness: Brian J. VanBlarcum

Date: November 3, 2025

Question:

389. Refer to lines 7-21 on page 4 of Mr. Vanblarcum's rebuttal testimony where he states that the Company calculated an appropriate amount of Accrued Income Taxes for the projected test year. Please explain how using the December 2024 balance less \$30 million with no accrued income tax liability for the projected test year is an appropriate amount of accrued taxes.

Response:

The Company's calculation starts with the 13-month accrued tax balance of \$256.080 million as of December 2024 as shown on Company witness Patrick Daly's Exhibit A-12 (PDD-34), Schedule B-4, line 15, column (p). This balance is not reflective of accrued income taxes related to the projected test year as it includes Federal, State, and Local income taxes accrued for the 2023 and 2024 tax years. The Company's \$30.04 million downward adjustment removes tax liability associated with the 2023 and 2024 tax years while adding Federal, State, and Local tax liability associated with the projected test year. Details for this adjustment can be found on Exhibit A-228 (BJV-3).

This adjustment does not include tax liability resulting from the additional revenue or rate relief sought in this case.

Witness: Brian J. Vanblarcum

Date: November 3, 2025

Question:

390. Refer to lines 17-23 on page 3 and page 4 of Mr. Bleckman's rebuttal testimony on the use of the short-term interest rate for the deferred line clearing expense and the statements that it would strain the Company's credit metrics and that current circumstances differ from the same approach taken with DTE Electric (DTEE). Please:

- a. Identify specifically what the financial strain to the credit metrics would be between using the short-term interest rate and the overall cost of capital rate during the period that the Company would hold the deferred expense in the regulatory asset account before securitization.
- b. Identify any financial strain to the credit metrics suffered by DTEE that Mr. Bleckman is aware of from applying the short-term interest rate to deferred tree trimming costs from their surge program.
- c. Identify what impact the high degree of volatility and economic uncertainty to the financial markets, interest rates, and geopolitical tensions had on the Company's financial results or financial position in 2024 and 2025. Provide this analysis in Excel with all assumptions clearly explained and data sources defined.

Response:

- a. If the regulatory asset is funded with short-term debt in lieu of pre-tax WACC, the Company's FFO would be lower and its debt higher, thereby weakening the Company's FFO-to-Debt ratio. Refer to page 54 of my direct testimony for an example of the credit metric impacts.
- b. While I am not familiar with the specific credit metric considerations for DTE Electric, the application of a short-term debt rate to a regulatory asset in lieu of pre-tax WACC has a negative impact on credit metrics as described in my direct and rebuttal testimony and part a. of this response.
- c. While the specific impact to historical financial results cannot be quantified, a higher degree of volatility and economic uncertainty generally results in a higher cost of debt and a higher required rate of return. A high degree of volatility and economic uncertainty has emerged in recent years (and since DTE Electric's order) with respect to financial markets, interest rates, and geopolitical tensions. These developments represent a material change in the Company's risk environment that should be considered in determining the appropriate interest rate to apply to ramp up spending in the instant case.

Witness: MARC R. BLECKMAN

Date: October 30, 2025

Question:

391. Refer to lines 11-22 on page 6 of Mr. Bleckman's rebuttal testimony on the higher deferral of line clearing expense proposed by Mr. Coppola and Mr. Bunch and the statement that this higher deferral would lower cash and increase financing costs. Please explain why the Company is concerned with this higher deferral of expenses when it frequently proposes deferral of other costs that protect its bottom line.

Response:

The Company is in full support of this and other expense deferral mechanisms. However, the cash flow and credit metric impact must also be considered as the Company continues to fund more customer investment ahead of customer collections. During the deferral period, the Company would be absorbing the cash and expense burden to fund the programs while not collecting any of those costs from customers. This deferral has the effect of increasing long-term financing needs for the Company without creating cash flow the way traditional capital does via non-cash depreciation expense in rates.

Witness: MARC R. BLECKMAN

Date: October 30, 2025

Question:

392. Refer to lines 17-18 on page 37 of Mr. Bleckman's rebuttal testimony that in his testimony Mr. Coppola brushed off the Company's recent FFO to Debt ratios. By brushing off this matter, is Mr. Blackman referring to Mr. Coppola's direct testimony on pages 109 through 115, Exhibit AG-44 with the pro-forma Cash Flow to Debt coverage ratio calculation, and the rating agencies' reports in Exhibits AG-47, AG-48, and AG-49? If no, what is Mr. Bleckman referring to outside of these items?

Response:

The Company is referring to Mr. Coppola's failure to give adequate consideration to the sizable amount of credit metric deterioration experienced by the Company in recent years. Since 2021, the Company's FFO-to-Debt ratio as calculated by S&P has decreased 410 basis points and has decreased 350 basis points according to Moody's. While Mr. Coppola dismisses these sharp declines as "temporary" and the result of "unusual and short-term issues," he fails to acknowledge that the decline in the Company's FFO-to-Debt ratio has coincided with recent rate cases which have resulted in a sharp decline in rate of return (ROE multiplied by equity ratio) having a directly negative result on credit metrics, both historic and future. Mr. Coppola also fails to consider that the "temporary" issues he identifies may actually persist in future years. In fact, the Company experienced a catastrophic storm in its service territory in late March / early April 2025 that will have a detrimental impact on the Company's credit metrics into 2027.

With regards to Mr. Coppola's Exhibit AG-44, refer to pages 39 to 40 of my rebuttal testimony showing that Mr. Coppola's approach is faulty and results in a pro-forma FFO-to-Debt ratio that is significantly overstated.

Witness: MARC R. BLECKMAN

Date: October 30, 2025

Question:

393. Refer to lines 1-14 on page 38 of Mr. Bleckman's rebuttal testimony regarding the statement that higher net income does not necessarily indicate higher cash flow and higher credit metrics. Please provide the net cash flow comparison for 2023 and 2024 starting with net income, adjusting for non-cash items, and resulting with the FFO to Debt ratio calculated by the Company. Provide this information in Excel.

Objection by Counsel: Consumers Energy objects to this discovery request on the grounds that it is vague and ambiguous. The Company is unclear about what the Attorney General means by "the FFO to Debt ratio calculated by the Company." The Company further objects on the grounds that this discovery request does not seek discovery of records in existence, but rather demands that the Company perform a new analysis. The Company does not have a legal obligation to perform new analyses for the Attorney General. Subject to the Company's objection, and without waiving its objection, Consumers Energy responds as follows:

Response:

It is not clear what this discovery request is referring to with regards to "the FFO to Debt ratio calculated by the Company." In my direct and rebuttal testimony, I refer to the FFO-to-Debt ratio as calculated by credit rating agencies and reported in their credit opinions. Also, the "net cash flow" data requested is not possible for S&P, who does not consider net income at all in its FFO-to-Debt ratio calculation. Refer to the Company's Securities and Exchange Commission reported financial statements for net income and the individual rating agencies' credit opinions and credit rating methodologies for their FFO-to-Debt ratio calculations.

Witness: MARC R. BLECKMAN

Date: October 30, 2025

Question:

394. Refer to lines 1-9 on page 40 of Mr. Bleckman's rebuttal testimony on the use of ratemaking versus financial basis information. Please confirm that rating agencies use information on a financial basis, as publicly disclosed by the Company, with appropriate adjustments and normalizations where warranted. If not confirming, provide evidence otherwise.

Response:

Confirmed. However, Mr. Coppola's proposed equity ratio of 50.0% is on a ratemaking basis. Therefore, his attempt to calculate the pro-formal impacts of a ratemaking equity ratio on the Company's financial results is inappropriate, faulty, and results in a pro-forma FFO-to-Debt ratio that is significantly overstated.

Witness: MARC R. BLECKMAN

Date: October 30, 2025

Question:

5. Refer to the rebuttal testimony of witness Bleckman, page 3, where the witness states:

“[T]he Company cannot finance the regulatory asset with debt. Doing so would add additional strain to the Company’s credit metrics...” Did Consumers calculate its expected company-wide FFO-to-Debt ratio if the Commission adopts witness Coppola’s or witness Bunch’s recommendation? If so, provide the calculations and associated workpapers and identify all assumptions used in the analysis. If not, explain why not.

Response:

The Company did not calculate a pro forma FFO-to-Debt ratio assuming witness Coppola’s or witness Bunch’s recommendation. A pro forma calculation is not required to demonstrate that a higher level of debt reduces the Company’s FFO-to-Debt ratio. As explained in direct and rebuttal testimony, the short-term debt rate is not an acceptable financing assumption for the deferred ramp up regulatory asset as financing the asset balance solely with debt would add additional strain to the Company’s credit metrics. The Company intends to fund the ramp up with a mix of long-term debt and equity, aligned with the Company’s approved capital structure. Therefore, the Company’s total WACC matches the ramp up related spending and is the appropriate rate to be applied to the regulatory asset.

Witness: MARC R. BLECKMAN

Date: October 29, 2025

Question:

396. Refer to lines 1-14 on page 55 of Mr. Bleckman's rebuttal testimony regarding the appropriate methodology to set the cash balance in working capital for the projected test year. Please explain why using the 1% of revenue rule of thumb based on data from other utilities is better than using the Company's own average cash balances over an extended period of three years.

Response:

As explained on page 55 of my rebuttal testimony, the Company's 1% of test year revenues rule of thumb is not intended to match other utilities' liquidity and financing practices. The Company acknowledges that different utilities hold different levels of cash and short-term debt based on their individual preferences and liquidity risk tolerance levels. The Company projects its cash balance at a level that is reasonable and appropriate for Consumers Energy, which equates to approximately 1% of test year revenues. The Company provided an analysis in August 2016 in Case No. U-17990 which showed that peer utilities hold, on average, total cash of approximately 2% of revenues. This analysis did not form the basis of the Company's 1% of test year revenues rule of thumb but was evidence in that case that the Company's general guideline was reasonable compared to other utilities.

Witness: MARC R. BLECKMAN

Date: October 30, 2025

Question:

397. Refer to lines 15-23 on pages 55 and lines 1-8 on page 56 of Mr. Bleckman's rebuttal testimony where it appears that he is confusing the inclusion of short term cash investments with other cash under GAAP, which the Commission has ruled are not allowed to be included in working capital, to the use of the capital structure of publicly traded utilities used in the calculation of the cost of equity capital.

- a. Does Mr. Bleckman deny the fact that under GAAP publicly-traded companies report short-term cash investments under Cash?
- b. Does Mr. Bleckman recognize that the capital structure of each of the utilities in the peer group reflects the financial risk of those companies assessed by investors and that the financial risk and capital structure need to be synchronized with the cost of equity in order to determine an appropriate ROE rate and capital structure for the Company?

Response:

- a. No. However, refer to the Company's response to discovery request AG-CE-0901. The Company is not basing its 1% of test year revenues rule of thumb on GAAP financial data or other utilities' cash management practices. The Company projects its cash balance on a ratemaking basis at a level that is reasonable and appropriate for Consumers Energy, which equates to approximately 1% of test year revenues.
- b. No, the capital structure of an ROE proxy group company at the parent holding company level should not have any bearing on the appropriate equity ratio for Consumers Energy, a regulated subsidiary. This has been made clear in the Company's testimony in rate case filings dating back several years, most recently on pages 45 to 46 of my rebuttal testimony in this instant case.

Witness: MARC R. BLECKMAN

Date: October 30, 2025

Question:

400. Refer to lines 1-10 on page 59 of Mr. Bleckman's rebuttal testimony on the use of cash in interest-bearing cash investments. Please confirm that if the Company receives the \$50.4 million in cash balance requested in this rate case, uses significantly less of that amount for operating needs, as shown in the 36-month historical cash balance data, then it has extra cash that it holds in interest bearing investments. If not confirming, provide evidence otherwise.

Response:

Confirmed with the qualification that excess cash may or may not be held in an "interest bearing investment." The Company acknowledges that its operating cash needs may ultimately be lower or higher than projected. Regardless of these fluctuations, the Company maintains a prudent, balanced, and consistent approach that minimizes liquidity risk. This approach results in a cash balance equal to approximately 1% of test year revenues. Additionally, the Company does not utilize a liquidity strategy aimed at holding excess cash. Further, any interest income earned on rate base working capital cash balances is included as a reduction to the Company's revenue requirement.

Witness: MARC R. BLECKMAN

Date: October 30, 2025

Question:

402. Refer to lines 1-4 on page 60 of Mr. Bleckman's rebuttal testimony on the recommended reduction in working capital for the case balance. Please confirm that the reference to \$44.1 million is incorrect and should be \$41.4 million.

Response:

Confirmed.

Witness: MARC R. BLECKMAN

Date: November 3, 2025

Question:

403. Refer to lines 9 through 18 on page 2 of Ms. Bulkley's rebuttal testimony and her recommended ROE rate of 10.25% with a calculated range of 10.25% to 11.25%. Has any state regulatory commission, where Ms. Bulkley has filed cost of equity testimony for electric utilities, approved any of her recommended ROE rates or any ROE rates within 50 basis points of her recommendations in the past five years? If so, provide evidence, including the utility name, the state where the utility is located, the case or docket number, the ROE rate she recommended, the date of the recommendation (filing date of the testimony in the case), the ROE rate decided by the state commission, and the date of the decision or settlement.

Response:

Ms. Bulkley does not maintain the requested data, however Attachment A of Ms. Bulkley's direct testimony provides a list of testimonies in which Ms. Bulkley has filed ROE testimony and their accompanying docket/case numbers.

Witness: Ann E. Bulkley

Date: November 3, 2025

Question:

404. Refer to lines 16-23 on page 5 and pages 116-117 of Ms. Bulkley's rebuttal testimony showing her adjusted ROE rates pertaining to Mr. Coppola and other witnesses. Please confirm that the adjusted ROE rates attributed to Mr. Coppola and other witnesses are the creation of Ms. Bulkley based on her own assumptions and preferred factors and approach. If not confirming, provide evidence otherwise.

Response:

Not confirmed. For example, as discussed on pages 37-38 of Ms. Bulkley's rebuttal testimony, Ms. Bulkley modified Ms. Coppola's constant Growth DCF analysis to: (1) rely on the 3-5 year projected earnings per share ("EPS") growth rates published by Zacks instead of his shorter term growth rates from Yahoo! Finance; and (2) included all of the growth rates for the proxy group companies published by Value Line and Zacks rather than arbitrarily and asymmetrically excluding certain growth rates. Therefore, the adjustments applied by Ms. Bulkley were to correct Mr. Coppola's constant growth DCF for inconsistencies with his approach in prior cases (i.e., Mr. Coppola relied on projected 3-5 year EPS growth rates from Zacks in Consumers Energy's most recent gas case as opposed to projected two-year growth rates from Yahoo! Finance) and unsupported assumptions (i.e., removing projected EPS growth rates he concluded were too high even though he did not provide a criteria for excluding nor did he consider excluding low-end outlier growth rates).

Additionally, as discussed on page 80 of Ms. Bulkley's rebuttal testimony, Ms. Bulkley adjusted Mr. Coppola's CAPM analysis to: (1) rely on an updated projection of the 30-year Treasury bond yield as the risk-free rate because Mr. Coppola was incorrectly relying on an outdated projection from May 2025; and (2) rely on the long term historical average market return as opposed to the long-term historical average market risk premium because current and projected interest rates were not equivalent to the long-term historical average interest rate included in the long-term historical average risk premium.

Finally, as discussed on pages 94-95 of Ms. Bulkley's rebuttal testimony, Ms. Bulkley adjusted Mr. Coppola's Risk Premium to: (1) rely on an updated projection of the 30-year Treasury bond yield as the risk-free rate because Mr. Coppola was incorrectly relying on an outdated projection from May 2025; (2) correct the calculation of the average spread between the yield on A-rated utility debt and the yield on the 30-year Treasury bond; and (3) rely on the correct historical risk premium of 4.27 percent as shown on workpaper AG-39B as opposed to 4.25 percent as relied on by Mr. Coppola.

It is evident that the adjustments Ms. Bulkley applied to Mr. Coppola's constant growth DCF, CAPM and Risk Premium analyses were not to use her "own assumptions and preferred factors and approach". Instead, the adjustments were to update and correct Mr. Coppola's analyses. As a result, the Commission should consider the adjusted results shown in Figure 21 on page 117 of Ms. Bulkley's rebuttal testimony instead of the results originally provided in Mr. Coppola's direct testimony.

Further, it is important to note that Ms. Bulkley also does not agree with many of the inputs and assumptions relied on by Mr. Megginson, Mr. Walters, and Mr. Bandyk and therefore has also applied adjustments to their respective cost of equity analysis. However, similar to the adjustments applied to

Mr. Coppola's analyses, the reasonable adjustments Ms. Bulkley made to the analyses of Mr. Megginson, Mr. Walters, and Mr. Bandyk keep intact the models and methods in which the witnesses determined their ROE results, changing certain assumptions or weightings.

Witness: Ann E. Bulkley

Date: November 3, 2025

Question:

405. Refer to page 7 of Ms. Bulkley's rebuttal testimony regarding her updated cost of equity results. What specific testimony are the updated results rebutting? Please explain why these updated calculations are being provided this late in the case, when Staff and intervenors have limited opportunity to adequately perform discovery and analysis of the updated data, assumptions, and calculations before the cross examination hearing.

Response:

As discussed throughout Ms. Bulkley's rebuttal testimony, Mr. Bulkley does not agree with many of the inputs and assumptions that were used by Mr. Megginson, Mr. Coppola, Mr. Walters, and Mr. Bandyk to estimate their respective cost of equity models. Therefore, Ms. Bulkley updated her cost of equity analyses using the same methodologies in her direct testimony to reflect more recent market data that is relatively consistent with the time period for the market data relied on by Mr. Megginson, Mr. Coppola, Mr. Walters, and Mr. Bandyk in response to the cost of equity analyses that they provided in their respective testimonies.

Witness: Ann E. Bulkley

Date: November 3, 2025

Question:

407. Refer to lines 3-14 on page 7 of Ms. Bulkley's rebuttal testimony regarding the use of ROE rates approved for other utilities by state regulatory commission and applicability to Consumers Energy. Please:

- a. Confirm that Consumers Energy does not have transmission assets.
- b. Confirm that the Company faces more business risk in the distribution business with recovery of costs than in the power generation business given that fuel and power costs are fully recovered or pre-approved through mechanisms, such as the PSCR and IRP, and the distribution business does not have those cost recovery mechanisms. If not confirming, provide evidence otherwise and identify the specific risks and financial losses in generation that the Company has suffered above the distribution business.

Response:

- a. Confirmed.
- b. Not confirmed. The generation function is generally regarded by investors as being higher risk than electric transmission or distribution. In fact, as discussed on pages 30-31 of Ms. Bulkley's rebuttal testimony, in its rating methodology, Moody's notes that vertically integrated electric utilities generally have greater risk than transmission and distribution electric utilities because they are engaged in generation, which is the most expensive part of a utilities infrastructure and has the greatest risk in construction and operation. Further, while Consumers Energy can recover fuel and power costs through mechanisms such as the PSCR and IRP, this does not fully mitigate the risks of owning generation. As Moody's noted there are operational risks and Consumers Energy has capital expenditures related to improving existing generation assets that would also not be recovered through a capital cost tracker.

Witness: Ann E. Bulkley

Date: November 3, 2025

Question:

408. Refer to lines 5-17 on page 30 of Ms. Bulkley's rebuttal testimony on Consolidated Edison being in the peer group. Please confirm that Consolidated Edison does have offshore wind power generations, which is much riskier than traditional power generation. If not confirming, provide evidence otherwise.

Response:

Not confirmed. Please see attached for a list of the limited generation assets owned by Consolidated Edison as reported by Standard & Poor's, which does not include any offshore wind power generation assets.

Witness: Ann E. Bulkley

Date: November 3, 2025

Question:

410. Refer to lines 18-19 on page 2 of Ms. Conrad's rebuttal testimony on the design of the incentive compensation plan. Please explain what the following statement means "Employees, as a whole, must re-earn the incentive/at-risk portion of compensation each year" relative to the issue that only one metric needs to be achieved to get a plan pay out? What do you mean "as a whole?"

Response:

The phrase "employees, as whole" means that eligible employees must meet the achievement requirements of the EICP goals each year before any payout occurs. The incentive is not a fixed amount that is guaranteed. It is "at risk" based on the outcome of the individual goal achievement.

Witness: Amy M. Conrad

Date: October 29, 2025

Question:

411. Refer to lines 3-4 on page 3 of Ms. Conrad's rebuttal testimony on the design of the incentive compensation plan. Please explain how meeting only one metric to achieve a plan pay out removes any potential mis-incentive to "give up" on one goal just because another may not have become unlikely to be achieved

Response:

Banded incentive goals define a range of performance for a set payout, while absolute goals (pre-2022) require meeting or exceeding a specific, single performance metric for a single payout. Banded incentive goals encourage consistent effort instead of giving up when an ambitious absolute target seems out of reach. Banded structure moves away from pass/fail to consistent effort toward achievement within the performance band. [Recognizing incremental progress motivates employees to continuously improve](#). For example, if an absolute target is missed by a small margin, employees may be completely demotivated. The absence of a payout for a near-perfect performance can feel unfair and negatively impact morale. Absolute targets may discourage extra effort since once a goal has been reached, employees may feel there is no reason to continue pushing for further improvement.

Witness: Amy M. Conrad

Date: October 30, 2025

Question:

412. Refer to lines 16-20 on page 5 and lines 1-9 and the table on page 6 of Ms. Conrad’s rebuttal testimony regarding the average achieved performance of the employee incentive compensation plan. Please confirm that the annual and 5-year average total performance percentages shown in the table reflect metrics achieved above 100% and up to 200% of target, which compensate for performance metrics not achieved or achieved below target or below the minimum threshold level. If not confirming, provide evidence otherwise.

Response:

Consumers Energy objects to this request on the grounds that the request is argumentative and requires the adoption of an assumption related to the interpretation of the data that it seeks to confirm. Subject to this objection, and without waiving it, Consumers Energy answers as follows:

The Company confirms the annual and 5-year average total performance percentages do reflect metrics achieved above 100% and up to 200% of target, but they do not compensate for metrics not below the minimum threshold level. Each performance category contributes separately to the total payout. Employees are incentivized to achieve in each category regardless of success in another because it could increase the potential payout.

Overall payout includes the results of each EICP metric whether it is below target performance, at target performance or above target performance results. The payout is an accumulation of all goal results.

The payout formula does not make achievement of any one goal less important. As stated in witness Meschke’s testimony on page 9 lines 15-18, “There is a direct tie between the design of the EICP operational goals and desirable benefits for customers. The operational goals focus on delivering customer value through safe, reliable, affordable, and clean energy services—all desirable benefits for customers.”

Beginning with 2022 payout, requirements moved to a banded approach (threshold, target and maximum) vs. a number of goals achieved. The company is not seeking recovery of above target level of payout.

Performance Year	Operational Goal Payout %	Performance Year	Operational Goal Payout at or above Target					
2020	125%	2020	7 of 9	78%	Target was 6 of 9 goals achieved			
2021	75%	2021	5 of 9	56%	Target was 6 of 9 goals achieved			
2022	109%	2022	4 of 6	67%	Moved to Banding. Not # of goals achieved			
2023	94%	2023	3 of 6	50%	Moved to Banding. Not # of goals achieved			
2024	124%	2024	4 of 6	67%	Moved to Banding. Not # of goals achieved			
5 Year AVG	105%	5 Year AVG		63%				

Witness: Amy M. Conrad

Date: October 30, 2025

Question:

385. Refer to pages 8-9 of Ms. Stewart's rebuttal testimony on the deferred line clearing expenses and establishing the most advantageous baseline. Confirm that using the \$110.2 million baseline proposed by Mr. Coppola versus the Company's baseline of \$164.5 would reduce O&M expense for the projected test year by \$54.3 million, which would lessen the amount of rate increase in this rate case and concurrently defer that additional amount for securitization and amortization over a period of up to 15 years at a low interest rate. Is the Company willing to reconsider and accept this proposal by the Attorney General that balances the needs and benefits for the Company and ratepayers? If not, explain why.

Response:

The Company agrees that by using the \$110.2 million baseline, LVD O&M forestry expenses for the projected test year would decrease by \$54.3 million and lessen the amount of the rate increase in the instant case. However, the Company continues to disagree with this proposed baseline.

As outlined in my rebuttal testimony (page 6, line 11 through page 8, line 23), the Attorney General's proposed \$110.2 million baseline is based on a 2024 historical spending level that does not reflect the significantly higher costs required to achieve the ramp-up to a five-year clearing cycle. This amount also falls below the amount currently authorized by the Commission in rates despite the Attorney General's support to move toward a five-year clearing cycle.

Additionally, as outlined in my direct testimony (page 36, lines 3-9), the Company's original proposal provides an appropriate benefit for customers. By deferring line clearing expenses above the baseline to a regulatory asset and securitizing that asset once it reaches a sufficient balance, the proposal would reduce the revenue deficiency in the instant case by \$21.4 million. The proposal also allows customers to benefit from spreading recovery over the period of time that matches the reliability benefits of the ramp-up.

However, as explained in my direct testimony (page 35), the Company's offer to securitize the regulatory asset was based on the ability to receive the prevailing pre-tax weighted average cost of capital (pre-tax "WACC") on the regulatory asset until the costs are securitized. The Attorney General proposed a short-term debt rate only. For these reasons, the Company does not agree with the Attorney General's proposed baseline or associated cost recovery approach.

Witness: Patrick D. Daly

Date: November 3, 2025

Question:

413. Refer to page 8 of Mr. Daly's rebuttal testimony on the baseline for the deferral of forestry expense. Please confirm that by using the \$110.2 million baseline amount the Company still gets to recover the actual amount spent above the baseline through the regulatory asset, which makes any inflation adjustment irrelevant.

Response:

The Company confirms that by using a \$110.2 million baseline, the Company would be able to defer the actual amount spent above the baseline to the regulatory asset. However, it is important to clarify that the Company's proposed baseline does not solely incorporate inflationary adjustments. Instead, it reflects the increased costs and expanded scope associated with transitioning to a five-year LVD line clearing cycle as supported by Company witness Sara E. Stewart. Such factors are appropriately considered in a projected test year. The Company maintains that its approach to calculating the baseline better reflects the cost of transitioning to and maintaining a five-year clearing cycle.

Witness: Patrick D. Daly

Date: October 31, 2025

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The undersigned certifies that a copy of the *Attorney General's PUBLIC Official Hearing Exhibits* was served upon the parties listed below by e-mailing the same to them at their respective e-mail addresses on the 6th day of November 2025.

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