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December 23, 2025

Ms. Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 W. Saginaw Highway
Lansing, MI 48909

Re: MPSC Case No. U-21870

Dear Ms. Felice:

Enclosed herewith for filing in the above-referenced matter, please find the Reply Brief of Solar Technology LLC, and the proof of service regarding same.

Very truly yours,



Jennifer Utter Heston

Enclosures
Cc: All Parties of Record

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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

Case No. U-21870

REPLY BRIEF OF
SOLAR TECHNOLOGY LLC

Dated: December 23, 2025

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NOW COMES Solar Technology LLC (“Solar Tech”), by and through its attorneys, Potomac Law Group, PLLC, and pursuant to the schedule established by Administrative Law Judge Jonathan F. Thoits (“ALJ”), hereby respectfully submits this Reply Brief on Consumers Energy Company’s (“Consumers”) application for authority to increase its rates for the generation and distribution of electricity and for other relief.

I. INTRODUCTION AND OVERVIEW.

In this Reply Brief, Solar Tech responds to certain specific positions advanced by the Michigan Environmental Council, Natural Resources Defense Council, Sierra Club, and Citizens Utility Board of Michigan (jointly as “MNSC”) in their Initial Brief filed on December 5, 2025. Many of the positions advanced by other parties to this proceeding in their initial briefs of concern to Solar Tech were anticipated and addressed in Solar Tech’s Initial Brief and will not be repeated herein. The positions advanced by the other parties do not dissuade Solar Tech. Solar Tech continues to support the positions identified in its Initial Brief for the reasons contained therein, and for the reasons discussed further below. There are, however, several claims and assertions that require a response. Solar Tech requests that the Commission: i) approve the same power factor adjustment provision for Rate LEDR as is used for Rate GPD and Consumers’ other primary rates; and ii) approve a facilities allowance for Rate LEDR, as proposed by Consumers.

II. TEST YEAR.

III. RATE BASE.

IV. CAPITAL STRUCTURE AND RATE OF RETURN.

V. ADJUSTED NET OPERATING INCOME.

VI. REVENUE DEFICIENCY CALCULATION.

VII. COST OF SERVICE, RATE DESIGN, AND TARIFF ISSUES.

A. Cost of Service.

B. Rate Design.

1. Rate Modifications.

a. Rate LEDR.

Rate LEDR is Consumers' large economic development rate. In its Initial Brief, Solar Tech addressed two Rate LEDR proposals in this case: i) the proposed power factor adjustment, and ii) the proposed facilities allowance. Solar Tech provides its response on these topics in this Reply Brief below.

i. Rate LEDR Power Factor Adjustment Clause.

References in the Record: Connolly Direct, 3 Tr. Corrected 160-161; Gray Direct, 3 Tr. Corrected 1123-1124, Exhibit A-16 Schedule F-5; Gorman Direct, 4 Tr. 2919-2930, Exhibits SLT-1 through SLT-3; Dauphinais Direct, 6 Tr. 3634, 3639, 3651, 3655-3657; Connolly Rebuttal, 3 Tr. Corrected 167.

The only parties to address the Rate LEDR power factor adjustment clause in their initial briefs were Consumers,¹ Solar Tech,² and ABATE.³ All parties addressing this topic concur that the power factor adjustment clause adopted for Rate LEDR in this case should be the power factor adjustment clause used for Consumers' other primary rates, Rates GP, GPD, GPTU, and EIP.⁴ The Commission should adopt the consensus recommendation for the reasons stated in the initial briefs.

ii. Rate LEDR Facilities Allowance.

References in the Record: Connelly Direct, 3 Tr. Corrected 159-160; Gray Direct, 3 Tr. Corrected 1124, Exhibit A-16 Schedule F-5; Dauphinais Direct, 6 Tr. 3652-3655; Palmer Direct; 6 Tr. 3907, 3908, 3930-3935, Exhibits MEC-19 through MEC-22; Connolly Rebuttal, 3 Tr. Corrected 169-170; Gorman Rebuttal, 4 Tr. 3171-3180; Dauphinais Rebuttal, 6 Tr. 3666-3667; Connolly Cross,

¹ Consumers' Initial Brief, p. 414.

² Solar Tech's Initial Brief, pp. 2-4.

³ ABATE's Initial Brief, fn. 43.

⁴ See, *supra* notes 1-3.

3 Tr. Corrected 175-535, Hearing Room Exhibits MEC-27 through MEC-31, and MEC-48.

The parties addressing the proposed Rate LEDR facilities allowance in their initial briefs were Consumers,⁵ Solar Tech,⁶ ABATE,⁷ and MNSC.⁸ Consumers, Solar Tech, and ABATE all support Consumers' proposed Rate LEDR facilities allowance in this case. Only MNSC opposes the proposed facilities allowance.

A facilities allowance for Rate LEDR has been an issue since Consumers adopted the rate in 2021.⁹ Many of the issues raised by MNSC in opposition to a facilities allowance for Rate LEDR were also raised by MNSC in opposition to the Rate LEDR facilities allowance proposed in Consumers' previous general rate cases, MPSC Case Nos. U-21389¹⁰ and U-21585.¹¹ Despite MNSC's opposition for a Rate LEDR facilities allowance in Consumers' prior general rate case, the Commission stated that "in its next electric rate case, if the company believes it beneficial to provide a facilities allowance for Rate LED, Consumers should propose a facilities allowance that includes only distribution and system contribution revenues, not power supply revenues, and that is based on a limited term."¹²

Consumers' proposal in this case follows the Commission's guidance. Consumers' proposed facilities allowance includes only distribution and system contribution margin revenues in the calculation of the proposed facilities allowance and limits the term of the allowance to just five years.¹³ The proposed 5-year facilities allowance is consistent with the standard allowance

⁵ Consumers' Initial Brief, p. 416-419.

⁶ Solar Tech's Initial Brief, pp. 5-9.

⁷ ABATE's Initial Brief, pp. 70-75.

⁸ MNSC's Initial Brief, pp. 96-117.

⁹ Connolly Direct, 3 Tr. Corrected p. 159.

¹⁰ See, Order dated March 1, 2024, MPSC Case No. U-21389, pp. 241-249.

¹¹ See, Order dated March 21, 2025, MPSC Case No. U-21585, pp. 418-419 & 422.

¹² Order dated March 21, 2025, MPSC Case No. U-21585, pp. 424-425.

¹³ Consumers' Initial Brief, p. 416.

offered to other primary customers.¹⁴ The Commission would not have provided this guidance if it were not receptive to approving a facilities allowance for Rate LEDR.

MNSC, however, again recommends that the Commission reject Consumers' proposed facilities allowance.¹⁵ MNSC states that if the Commission approves a facilities allowance, then it should not be applied to existing Rate LEDR customers and it should require Consumers to track and true-up revenues from the allowance to ensure that all Rate LEDR interconnection costs are recovered.¹⁶ Further, MNSC indicates that Rate LEDR should be modified going forward to increase the system contribution charge and to shorten the allowed term.¹⁷ MNSC's arguments are without merit. The Commission should approve the proposed Rate LEDR facilities allowance.

(1) Rate LEDR is not a discounted rate.

To begin, MNSC argues that Rate LEDR already "provides excessive and unreasonable discounts."¹⁸ MNSC then compares the Rate LEDR charges to Consumers' primary demand rate, Rate GPD, charges.¹⁹ MNSC's comparison, however, is misguided and inapposite. Consumers' Rate GPD is a fully-embedded cost to serve rate whereas Rate LEDR is an economic development rate. They are two different rates designed to provide cost-based service to two different types of customers imposing different costs on Consumers. Rate GPD serves existing customer load based on Consumers' overall average cost to provide electric service using Consumers' overall portfolio of resources. In contrast, Rate LEDR is an economic development rate that was designed to serve new load at Consumers' marginal cost to provide service to the new load.

¹⁴ Connolly Direct, 3 Tr. Corrected p. 160.

¹⁵ MNSC Initial Brief, pp. 96-117.

¹⁶ Id., p. 96.

¹⁷ Id.

¹⁸ Id., p. 97 & 111.

¹⁹ Id., pp. 97-101.

Rate LEDR is not a discounted rate. Consumers' witness Connolly explained that Rate LEDR is not a discounted rate.²⁰ Witness Connolly explained that the rate is based on cost of service and that the Commission determined that the rate complies with Michigan law, is reasonable, and in the public interest.²¹ The Commission could not have approved the rate if the rate did not comply with Michigan's statutory requirement that rates are equal to the cost of providing service.²²

(2) Consumers' proposed facilities allowance in this case is responsive to the Commission's previously stated concerns.

MNSC then summarizes the Commission's previous determinations regarding past Rate LEDR facilities allowance proposals.²³ MNSC's statements are not relevant and misleading. The Commission's previous statements regarding previous Rate LEDR facilities allowance proposals do not reflect how the Commission will evaluate Consumers' proposal in this case. Consumers' Rate LEDR facilities allowance proposals evolved from MPSC Case No. U-21389 to MPSC Case No. U-21585 to the current case. In MPSC Case No. U-21389, the Commission reaffirmed its support for economic development but found the facilities allowance proposal in that case did not adequately protect against a potential rate subsidy.²⁴ In MPSC Case No. U-21585, Consumers again sought approval of a Rate LEDR facilities allowance. The Commission again did not approve the proposals in that case but provided clear guidance as to what the Commission

²⁰ Connolly Rebuttal, 3 Tr Corrected 171.

²¹ Id.

²² See, MCL 460.11(1), "Except as otherwise provided in this subsection, the commission shall ensure the establishment of electric rates equal to the cost of providing service to each customer class. In establishing cost of service rates, the commission shall ensure that each class, or sub-class, is assessed for its fair and equitable use of the electric grid."

²³ MNSC's Initial Brief, pp. 102-104.

²⁴ "The Commission is actively supportive of economic development in Michigan . . . However, the Commission agrees with the ALJ that 'the arguments regarding the proposed facilities allowance creating a subsidy for Rate LED customers' are persuasive." Order dated March 1, 2024, MPSC Case No. U-21389, p. 248.

would find appropriate. Consumers then filed for approval of an allowance in this case that strictly adheres to the Commission's guidance. MNSC concurs that the proposed facilities allowance in this case is much narrower than previous proposals.²⁵ Thus, the Commission's previous statements regarding concerns with previously proposed Rate LEDR facilities allowances do not apply.

(3) MNSC's concerns regarding incremental shared distribution system costs are misguided and unwarranted.

MNSC then argues that the proposed facilities allowance should be denied because Consumers has not demonstrated that it is just, reasonable, or needed.²⁶ MNSC first claims that Consumers did not prove that reducing the Rate LEDR customer's incremental distribution charge would not increase costs for others.²⁷ MNSC then cites its witness Palmer's testimony that there are two categories of distribution costs that must be addressed.²⁸

Witness Palmer testified that Consumers did not demonstrate that the distribution revenues collected from the Rate LEDR customer would be sufficient to cover the facilities allowance provided to the Rate LEDR customer and the added costs associated with the higher demand on the shared distribution system.²⁹ The witness was concerned that costs for other customers "could" increase unless Consumers makes this demonstration.³⁰

In rebuttal, witness Connolly addressed witness Palmer's concerns.³¹ Witness Connolly explained that the Rate LEDR customer pays the same distribution charges as Rate GPD customers, plus an additional distribution charge for distribution investments made to serve the

²⁵ MNSC's Initial Brief, p. 105.

²⁶ MNSC's Initial Brief, p. 104-113.

²⁷ Id., p. 105-109.

²⁸ Id.

²⁹ Palmer Direct, 6 Tr. 3931.

³⁰ Id., p. 3931, ln. 12.

³¹ Connolly Rebuttal, 3 Tr. Corrected 169-170.

new customer.³² Thus, the Rate LEDR customer is making a contribution to Consumers' shared distribution costs plus covering the total cost of incremental distribution investments.³³ Witness Connolly stated that witness Palmer's assessment is flawed.³⁴

Solar Tech's witness Gorman also responded to witness Palmer's concerns.³⁵ Witness Gorman explained that witness Palmer's concerns were not reasonable because the proposed allowance is specifically designed to ensure that Consumers recovers its incremental distribution investment to serve the new Rate LEDR customer by adjusting distribution charges as necessary to align with the cost, just as it does for all other primary customers.³⁶

Witness Gorman also explained that Rate LEDR customers are typically served from dedicated distribution facilities constructed specifically and exclusively to serve the Rate LEDR load.³⁷ Thus, there are no incremental shared distribution system costs associated with the Rate LEDR customer.

In its Initial Brief, MNSC claims without any support that witness Gorman's claim is "not plausible."³⁸ MNSC asserts that it is not plausible that Consumers could interconnect a 35 MW customer without added any shared distribution investments,³⁹ but that is, in fact, what typically occurs. Witness Gorman explained that very large load customers are typically directly connected to the interstate transmission system and that Consumers' investment in distribution infrastructure to interconnect that load is not part of Consumers' common or shared system.⁴⁰ Consumers' investment in distribution infrastructure to interconnect very large loads is typically limited to

³² Id., p. 169.

³³ Id.

³⁴ Id.

³⁵ Gorman Rebuttal, 4 Tr. 3172-3180.

³⁶ Id., pp. 3173-3176.

³⁷ Id., p. 3177.

³⁸ MNSC's Initial Brief, p. 108.

³⁹ Id.

⁴⁰ Gorman Rebuttal, 4 Tr. 3177.

investment in a dedicated substation that is then directly connected to the transmission system.⁴¹ MNSC's assertion that this arrangement is "not plausible" indicates a lack of understanding about how extra-large loads are served. Consequently, there is usually not any added cost associated with incremental investment in any shared distribution facilities that witness Palmer is concerned about.⁴²

MNSC also complains that witness Gorman provides no support for his "bare assertion" that these very large load customers are not typically served using any of the utility's shared distribution network.⁴³ Witness Gorman, however, has served as an energy regulatory expert for nearly 40 years,⁴⁴ including 35 years consulting specifically to large energy users.⁴⁵ Witness Gorman's expertise and decades of experience qualify him to testify on what he observes regarding the provision of electric service to large customers.

ABATE witness James R. Dauphinais also responded to witness Palmer's remarks regarding the Rate LEDR facilities allowance.⁴⁶ Witness Dauphinais recommended that the Commission approve the proposed facilities allowance.⁴⁷ He stated that witness Palmer provided no evidence that there would be marginal distribution costs to serve the Rate LEDR customer beyond the dedicated distribution facilities.⁴⁸

⁴¹ Id.

⁴² Gorman Rebuttal, 4 Tr. 3172-3180.

⁴³ MNSC's Initial Brief, p. 109.

⁴⁴ Gorman Direct Appendix A, 4 Tr. 2932.

⁴⁵ Id.

⁴⁶ Dauphinais Rebuttal, 6 Tr. 3666-3667.

⁴⁷ Id., p. 3367.

⁴⁸ Id.

(4) MNSC's concerns regarding transmission and distribution cost recovery in the unlikely event of an early termination are based on a misunderstanding of the tariff provision and Consumers has agreed to a reconciliation of costs and revenues.

MNSC then falsely claims that there is a “significant risk” that the Rate LEDR customer will not cover all the distribution costs necessary to interconnect the large load.⁴⁹ MNSC then implies that early termination payments included in Rate LEDR contracts are not sufficient to cover the remaining balance of any transmission and distribution system investments if the customer terminates service early.⁵⁰ To begin, MNSC misunderstands the chart that MNSC included in its Initial Brief that appears in the Rate LEDR tariff.⁵¹ The referenced chart was addressed in Consumers’ application in MPSC Case No. U-21160 on page 7. If the Rate LEDR customer terminates service prior to the completion of the contract term, then they must pay for the investments made to serve the customer according to the enumerated schedule. Up to 50% of the contract term, the customer must pay 100% of investment costs. If the customer terminates service more than 90% to 99.9% of the contract term, then the customer must pay 17% of investment costs, even though only up to 10% remains in the contract term. In each row in the table, the amount of investment costs that must be paid due to early termination exceeds the proportion of the time remaining in the contract term.

Further, Consumers witness Connolly clarified that Consumers agrees to witness Palmer’s true-up proposal for the facilities allowance.⁵² She stated that it is Consumers’ intention to reconcile any differences between actual and proposed collections.⁵³ Thus, there is no basis for

⁴⁹ MNSC’s Initial Brief, p. 110-111.

⁵⁰ Id.

⁵¹ Id.

⁵² Connolly Rebuttal, 3 Tr. Corrected 170.

⁵³ Id.

MNSC's allegation that there is a "significant risk" that Rate LEDR will not recover the costs to provide service to the Rate LEDR customer.

(5) Consumers has materially developed its proposed facilities since it was first introduced in MPSC Case No. U-21389.

MNSC then argues that Consumers has not materially developed its proposed facilities allowance since Consumers first proposed the allowance in MPSC Case No. U-21389.⁵⁴ This is false. In other portions of MNSC's Initial Brief, MNSC admits that Consumers has "rightfully narrowed" the proposed facilities allowance directly in response to the Commission's previously stated concerns.⁵⁵ The facilities allowance proposed in this case is much narrower than any previously proposed facilities allowance in direct response to concerns raised and the narrower allowance is fully supported by expert witness testimony.

(6) Parties explained the importance of a facilities allowance for economic development.

MNSC next claims that Consumers did not provide evidence as to how a Rate LEDR facilities allowance would promote economic development.⁵⁶ MNSC asserts that two customers have signed Rate LEDR contracts without a facilities allowance so a facilities allowance is not truly needed to support economic development.⁵⁷ MNSC's claims are without merit and should be rejected.

Parties to this proceeding sponsored expert witness testimony explaining the importance of a facilities allowance for Consumers to attract development. Consumers' witness Connolly explained that potential customers have asked Consumers about the availability of a facilities

⁵⁴ MNSC's Initial Brief, p. 111-112.

⁵⁵ See, MNSC's Initial Brief, p. 105.

⁵⁶ MNSC's Initial Brief, p. 112.

⁵⁷ Id.

allowance such as the one offered by DTE Electric Company's Rate D13.⁵⁸ The proposed facilities allowance is in response to customer inquiries and to allow Consumers to better compete with other utilities.⁵⁹ Witness Dauphinais also explained that attracting new loads benefits customers because those loads will pay a normally allocated share of the utility's embedded cost of service in the future.⁶⁰ He also explained that the allowance will improve Consumers' competitiveness with other economic development rates.⁶¹

While two customers proceeded with their developments pending resolution of the Rate LEDR facilities allowance, that does not show the number of projects that have not been developed in Consumers' service area because there has not been a facilities allowance option. Consumers' personnel are in the best position to explain how many projects do not get developed due to the lack of a facilities allowance option.

(7) The Commission should permit existing Rate LEDR customers to participate in any facilities allowance.

MNSC next opposes allowing Consumers' two existing Rate LEDR customers from using a facilities allowance.⁶² MNSC contends that the two existing Rate LEDR customers developed their projects without it, so they do not need it for Consumers to attract their load.⁶³ MNSC's position should be rejected.

Witness Connolly opposed witness Palmer's recommendation to exclude existing Rate LEDR customers from the facilities allowance. Witness Connolly explained that work on a Rate LEDR facilities allowance pre-dates contracts with existing Rate LEDR customers and those

⁵⁸ Connolly Direct, 3 Tr. Corrected 159.

⁵⁹ Id.

⁶⁰ Dauphinais Direct, 6 Tr. 3653.

⁶¹ Id., pp. 3653-3654.

⁶² MNSC's Initial Brief, p. 113-116.

⁶³ Id., p. 113.

customers entered into contracts considering the potential for an eventual allowance.⁶⁴ She states that the Rate LEDR facilities allowance should be applied to Rate LEDR contracts that address the potential for an eventual allowance.⁶⁵

Witness Gorman also supported the application of the proposed facilities allowance to existing Rate LEDR customers pursuant to the terms of their contracts.⁶⁶ Witness Gorman explained that other existing customers can access a facilities allowance.⁶⁷ Witness Gorman also explained that Rate LEDR customers may also have opportunities for load growth that could be facilitated by a facilities allowance and that these opportunities should not be foreclosed by prohibiting Consumers' two existing Rate LEDR customers from accessing a facilities allowance.⁶⁸ In short, witness Gorman determined that witness Palmer's concerns were unfounded and unsupported.⁶⁹

Solar Tech recommends that Consumers' proposed Rate LEDR facilities allowance be approved. As proposed, the allowance is limited to just five years of distribution and system contribution margin revenues. These very large load customers are typically served using dedicated distribution facilities, making their incremental costs readily identifiable and concerns about potential increases in shared distribution system costs unfounded. The Rate LEDR allowance has been an issue for many years that pre-dates existing Rate LEDR contracts negotiated based on the potential for a Rate LEDR allowance. Existing Rate LEDR customers should be allowed to participate in any allowance approved. Consumers also agrees to true-up the allowance to account for any differences between projected and actual revenues to ensure cost recovery. A

⁶⁴ Connolly Rebuttal, 3 Tr. Corrected p. 170.

⁶⁵ Id.

⁶⁶ Gorman Rebuttal, 4 Tr. pp. 3178-3179.

⁶⁷ Id., p. 3179.

⁶⁸ Id.

⁶⁹ Id.

facilities allowance is an important tool to help facilitate the interconnection of new large loads and would allow Consumers to compete for large load customers with other utilities that offer an allowance. MNSC's concerns are without merit. Consumers' proposed allowance should be approved.

C. Tariff Issues.

VIII. OTHER ISSUES

IX. CONCLUSION

For all the reasons explained in the preceding sections of this Reply Brief and in its Initial Brief, Solar Tech respectfully requests that the Commission: i) approve the same power factor adjustment provision for Rate LEDR as is used for Rate GPD and Consumers' other primary rates; and ii) approve a facilities allowance for Rate LEDR, as recommended by Consumers.

Respectfully submitted,

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STATE OF MICHIGAN

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Case No. U-21870

PROOF OF SERVICE

Jennifer Heston hereby certifies that, on the 23rd day of December 2025, she served the Reply Brief of Solar Technology LLC and this Proof of Service upon the persons identified on the attached service list by electronic mail.

/s/ Jennifer Heston _____
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