



Report of the Independent Administrator

Consumers Energy Company – 2020

Request for Proposal for Solar Generation Projects

Dated: June 29, 2021

Updated: October 6, 2021



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Executive Summary

Introduction

Consumers Energy Company (“Consumers Energy” or the “Company”) retained Enel X North America, Inc. (“Enel X”) through its *Independent Administrator (IA) for Consumers Energy’s Integrated Resource Plan (IRP) Program Request for Proposals* (“IA RFP”) to serve as an independent third-party administrator in support of its supply-side resource solicitations (“IRP solicitations”).

Enel X is based in Boston, MA and has been conducting large-scale energy solicitations on behalf of its utility clients for nearly two decades. Enel X built its proprietary procurement technology and developed robust processes exclusively for energy solicitations. Enel X has continued to invest in technology and has continued to hone its processes with the vision of being the undisputed leader in the high-stakes, high-scrutiny world of large-scale utility energy solicitations.

Enel X has prepared this initial draft Independent Administrator Report (“Initial Draft IA Report”) in support of the *Consumers Energy Company Request for Proposals for Solar Generation Projects* (“Consumers Energy RFP” or the “RFP”) issued on July 29, 2020.

RFP Purpose, Background

The purpose of the Consumers Energy RFP was to 1) solicit offers for Consumers Energy to acquire solar generation projects and/or solar power purchase agreements (“PPAs”) backed by projects located in that portion of the lower peninsula of the State of Michigan that is serviced by the Midcontinent Independent System Operator (MISO) and 2) solicit offers for PURPA qualifying facilities 20 MW and below located within Consumers Energy’s service territory. Proposals located within this region (MISO’s Local Resource Zone 7) were requested to support Consumers Energy’s IRP. With its RFP, Consumers Energy sought to acquire solar generation projects and PURPA qualifying facilities that provided the lowest net costs to its customers.

Consumers Energy sought to acquire up to 300 MW of additional aggregate nameplate capacity projects with commercial operation dates on or before May 31, 2023, all located in the State of Michigan’s Lower Peninsula to support Consumers Energy’s IRP. Of the 300 MW solicited, Consumers Energy sought to acquire 150 MW via long-term PPAs and 150 MW via build transfer agreements (“BTAs”) or a Company proposed project.

RFP Schedule

The Consumers Energy 2020 Solar Solicitation has followed, and is intended to continue to follow, the schedule detailed below (select dates within the RFP Schedule were/are subject to change as-warranted by Consumers Energy):



#	RFP Milestone	Date
STAGE 1: RFP RELEASE, RESPONDENT PRE-QUALIFICATION		
1	Notification of Upcoming RFP Issued via Email to Potential Respondents	Thursday, July 9, 2020
2	RFP Issued, Solicitation Website, Documents Go-Live	Wednesday, July 29, 2020
3	Questions and Answers Window Opens	Wednesday, July 29, 2020
4	Respondent Qualification Application Submission Window Opens	Wednesday, July 29, 2020
5	Pre-Bid Conference Call Held (2:00 PM EPT)	Monday, August 3, 2020
6	Respondent Qualification Application Submission Window Closes	Wednesday, August 5, 2020
7	Initial Review of Submitted Respondent Qualification Applications Begins	Wednesday, August 5, 2020
8	Initial Review of Respondent Qualification Applications Concludes, Remediation Notices/Requests for Clarification Distributed	Friday, August 7, 2020
9	Respondent Qualification Application Remediation Materials/Responses to Clarifying Requests Due	Tuesday, August 11, 2020
10	Final Review of Respondent Qualification Applications Completed, Approvals Determined	Wednesday, August 12, 2020
11	Stage 1 Notices to Proceed Issued to Pre-Qualified Respondents (Respondent Organizations Pre-Qualified)	Wednesday, August 12, 2020

#	RFP Milestone	Date
STAGE 2: PROJECT PRE-QUALIFICATION		
12	Project Qualification Submission Window Opens for Pre-Qualified Respondents	Wednesday, August 12, 2020
13	Project Qualification Submission Window Closes	Tuesday, August 25, 2020
14	Initial Review of Submitted Project Qualification Forms, Supporting Documents Begins	Tuesday, August 25, 2020
15	Initial Review of Project Qualification Forms Concludes, Remediation Notices/Requests for Clarification Distributed	Friday, August 28, 2020
16	Respondent Project Qualification Form Remediation Materials/Responses to Clarifying Requests Due	Friday, September 4, 2020
17	Final Review of Respondent Project Qualification Forms Completed, Approvals Determined	Wednesday, September 9, 2020
18	Stage 2 Notices to Proceed Issued to Pre-Qualified Respondents (Respondent Projects Pre-Qualified)	Wednesday, September 9, 2020

#	RFP Milestone	Original Date	Revised Date (as of 9/30/2020)
STAGE 3: PROJECT APPLICATION FEES AND PRE-BID SECURITY COLLECTED, BINDING BID AGREEMENT AND BINDING AFFIDAVITS DUE			
19	Invoices for RFP Application Fees Issued to Respondents	Wednesday, September 9, 2020	-
20	Redline Submission Window for Negotiable Contract Items Opens	Wednesday, September 9, 2020	-
21	Redlines to Negotiable Contract Items Due	Tuesday, September 15, 2020	-
22	RFP Application Fees Due	Tuesday, September 15, 2020	-
23	Guidance on Submitted Redlines Provided to Respondents, Contract Templates Updated (If Warranted)	Tuesday, September 29, 2020	Tuesday, October 6, 2020
24	Wire Transfer Remittance Forms Due	Friday, October 2, 2020	Friday, October 9, 2020
25	Binding Bid Agreements, Binding Respondent Affidavits, Agreement in Principle to Utilize Contract Templates Due	Wednesday, October 7, 2020	Wednesday, October 14, 2020
26	Pre-Bid Financial Security (Cash Deposits) Due	Wednesday, October 7, 2020	Wednesday, October 14, 2020
27	Final Respondent and Project Approvals Determined	Thursday, October 8, 2020	Thursday, October 15, 2020
28	Stage 3 Notices to Proceed Issued (Non-Negotiable Contract Items Addressed, Bid Security Posted)	Friday, October 9, 2020	Friday, October 16, 2020

RFP Schedule continued on following page.



#	RFP Milestone	Date	Revised Date (as of 11/10/2020)
PPA AND BTA PROPOSALS DUE, PROPOSALS SCREENED, SHORTLISTS DEVELOPED, PRELIMINARY AWARD DECISIONS CONVEYED, CONTRACTING PHASE BEGINS			
29	Questions and Answers Window Closes	Friday, October 16, 2020	-
30	PPA Live Reverse Auctions Run on Enel X Solicitation Platform	Tuesday, October 20, 2020	-
31	BTA Sealed Bid Event Run on Enel X Solicitation Platform	Thursday, October 22, 2020	-
32	Initial Respondent/Proposal Eligibility Screening Period Concludes	Tuesday, October 27, 2020	-
33	Respondents Notified of Ineligible Proposals	Tuesday, October 27, 2020	-
34	PPA, BTA Offer Shortlists, Proposal Rankings Provided to Consumers Energy	Wednesday, October 28, 2020	-
35	Consumers Energy Provides Enel X with Selected Proposals from PPA, BTA Lists	Thursday, November 12, 2020	Tuesday, November 24, 2020
36	Preliminary Award Decisions, Statuses Distributed by Enel X	Friday, November 13, 2020	Tuesday, November 24, 2020
37	Enel X Provides Consumers Energy with Details of Selected Proposals, Respondents	Friday, November 13, 2020	Tuesday, November 24, 2020
38	Consumers Energy Begins Due Diligence Review of Selected Proposals, Respondents, Initiates Contracting Phase	Monday, November 16, 2020	Monday, November 30, 2020
39	Consumers Energy Informs Enel X of Need for Alternate Proposals, Respondents	Wednesday, December 16, 2020	-
40	If Applicable; Consumers Energy Provides Enel X with Selected Alternate Proposals from PPA, BTA Lists	Wednesday, December 16, 2020	-
41	If Applicable, Secondary Award Decisions, Statuses Distributed by Enel X	Thursday, December 17, 2020	-
42	If Applicable; Enel X Provides Consumers Energy with Details of Alternate Proposals, Respondents Selected	Thursday, December 17, 2020	-
43	If Applicable; Consumers Energy Begins Due Diligence Review of Selected Alternate Proposals, Respondents, Initiates Contracting Phase	Friday, December 18, 2020	-
44	Pre-Bid Credit for Unawarded Respondents Cancelled, Returned (Valid Proposal Duration Concludes)	Wednesday, June 30, 2021	-
45	Agreements, Contracts for Selected Proposals Finalized, Executed	-	-
46	Pre-Bid Credit for Awarded Respondents Cancelled, Returned	Following Contract Execution	Following Contract Execution
47	Contracts, Agreements Submitted to MPSC	-	-

Summary of Findings

Enel X conducted and monitored the Consumers Energy 2020 Solar Solicitation in its entirety. As demonstrated throughout this report, Enel X attests that each element of the 2020 Solar Solicitation was run in a fair and transparent manner and that RFP results were competitive and reflective of market conditions.



Preparation Phase

Overview

Enel X's involvement within the Consumers Energy 2020 Solar Solicitation Preparation Phase spanned from the preparation and conduction of a second Stakeholder Workshop on March 20, 2020 to July 29, 2020 (the date of issuance for the 2020 Consumers Energy RFP).

The Preparation Phase covered a number of key tasks associated with the development and finalization of RFP documents and materials, the engagement and support of RFP stakeholders, the development and issuance of RFP advertisements, the development of an RFP listserv containing over 200 organizations, and other pertinent pre-RFP release tasks.

RFP Documents

Enel X reviewed and provided various comments and proposed modifications to a host of Consumers Energy-developed RFP documents and templates. Additionally, Enel X drafted multiple supporting RFP documents and materials for review and approval by Consumers Energy.

The following RFP documents and materials were developed by Consumers Energy:

1. Consumers Energy Company 2020 Solar Generation Projects RFP
2. Appendix D-1: Build Transfer Agreement Pricing and Technical Bid Form
3. Appendix D-2: Power Purchase Agreement Pricing Bid Form
4. Appendix E-1: Build Transfer Agreement Term Sheet
5. Appendix E-2: Build Transfer Agreement Template
6. Appendix F: Power Purchase Agreement (Transmission) Template
7. Appendix G: Power Purchase Agreement (Distribution) Template
8. Appendix H: Build Transfer Agreement Technical Specifications
9. Appendix I: Exceptions to Build Transfer Agreement Technical Specifications
10. Appendix J: Value Added Criteria Qualification Form
11. Appendix K: Acceptable Manufacturers List Process
12. Appendix L: Low Income County List
13. Economic Model – 2020 IRP RFP Competitive Solicitation Owned
14. Economic Model – 2020 IRP RFP Competitive Solicitation PPA

The following RFP documents and materials were developed and/or provided by Enel X:

1. Utility Dive RFP Advertisement
2. RFP Notice Email Templates
3. Consumers Energy and Enel X Pre-Bid Conference Call PowerPoint Presentation
4. Consumers Energy and Enel X Pre-Bid Conference Call Recording
5. Enel X 2020 W9 Form (to support application fee payments and Pre-Bid Security deposits)



6. Wire Transfer Remittance Form
7. Respondent Bidding Instructions
8. Proposed Changes to BTA (Appendix E-1 and E-2) and PPA (Appendix F and G) Contract Templates
9. Appendix A: Respondent Qualification Application - Due by 5:00 PM EPT on August 5, 2020
10. Appendix B-1: Project Qualification Application
11. Appendix B-2: Project Qualification Database
12. Appendix C: Binding Bid Agreement and Binding Respondent Affidavit
13. 2020 IRP RFP Questions and Answers (Q&A) Document

Stakeholder Engagement

Enel X participated within a second IRP Competitive Solicitation Workshop ("Stakeholder Workshop") held virtually via a WebEx event hosted on March 20, 2020. During the Stakeholder Workshop, representatives from Consumers Energy and Enel X reviewed the 2019 and 2020 Solar Solicitations, the provisional results of the 2019 Solar Solicitation, lessons learned and proposed process improvements stemming from the 2019 Solar Solicitation, and to-be-implemented changes for the 2020 Solar Solicitation.

Consumers Energy and Enel X established two separate windows during the second Stakeholder Workshop to allow participating stakeholders to ask clarifying questions either verbally or by way of the WebEx system. Consumers Energy and Enel X also established a third window towards the end of the second Stakeholder Workshop to allow participating stakeholders to submit general comments and suggestions.

Following the second Stakeholder Workshop, Consumers Energy invited stakeholders to submit comments and suggestions via email to a Consumers Energy managed email account (pwr-rfp@cmsenergy.com).

Further, within 35 calendar days of the second Stakeholder Workshop, both Consumers Energy and stakeholders had an opportunity to file comments about the reasonableness of Consumer Energy's competitive bidding procedures and to recommend changes and additions. Following the filing of comments and recommendations, both Parties would then have 21 calendar days to file responses (within Docket U-20165).

Ample opportunity was afforded to all stakeholders to examine and opine on various Consumers Energy RFP related matters. Throughout the Preparation Phase, stakeholders were kept apprised of the development of the Consumers Energy RFP and solicitation processes.

RFP Advertisement

Enel X developed and scheduled the publication of a Consumers Energy 2020 Solar Solicitation advertisement, utilizing the advertisement template previously approved for publication by Consumers Energy. The RFP advertisement was run on the public homepage of the Utility Dive website.

For the 2020 Solar Solicitation, the public advertisement was run for a longer duration of time compared to the 2019 Solar Solicitation advertisement, run within more sections of the public Utility Dive website, and ultimately captured a total of 40,000 unique impressions.

Utility Dive



Utility Dive is public energy industry news website and daily newsletter that covers a wide breadth of news and trends of impact within the utility industry. The public Utility Dive website attracts 215,000+ monthly unique visitors, with primary viewership by the following company types: Investor Owned Utilities, Municipalities, Solar/Renewables Contractors, Developers, and Energy Performance Contractors.

A banner advertisement and native advertisement for the Consumers Energy RFP was run at the top of the Utility Dive homepage and two additional advertisements were run in-line with the Utility Dive homepage article listings. All advertisements were run from July 30, 2020 through August 6, 2020 and all contained a link to the public Solicitation Website (<https://www.consumersenergyrfp.com>) and an email address to the Independent Administrator.

The screenshot shows the Utility Dive homepage with a navigation bar at the top. The main content area features several articles and advertisements. Two red boxes highlight native advertisements for the Consumers Energy 2020 Solar RFP Announcement. The first box is located in the top right corner, and the second box is located in the bottom left corner. Both boxes contain the text "Consumers Energy 2020 Solar RFP Announcement" and a link to the public Solicitation Website (<https://www.consumersenergyrfp.com>).

Utility Dive Deep Dive Opinion Podcasts Library Events Topics

COVID-19
US Power Sector Impact Tracker

Tracking the impacts of coronavirus on the US power sector
July 28: Senate Republicans, corporations press for inclusion of clean energy in next COVID-19 recovery package; COVID-19 should not prevent utilities from investing in renewables: Xcel CEO
UPDATED: July 28, 2020 at 10:05 a.m.
@ Generation

Consumers Energy 2020 Solar RFP Announcement
Visit [ConsumersEnergyRFP.com](https://www.consumersenergyrfp.com)
or email: ceia.enelx@consumers.com
enel x

Utilities must prioritize customer experience to advance role of electric vehicles on the grid: experts
Utilities want to use electric vehicles to manage their distribution grids more efficiently, but experts on a Smart Electric Power Alliance panel Tuesday warned the focus must remain on the customer experience.
@ Transmission & Distribution

Trump to nominate Democratic, Republican appointees to FERC
Democratic nominee Allison Clements was long rumored to be a front runner for the position, and will be submitted for consideration alongside Virginia state regulator Mark Christie.
@ Regulation & Policy

DC regulators consider 'light touch' when it comes to microgrid rules
The Public Service Commission of the District of Columbia is considering the development of a regulatory framework for microgrids, hoping to encourage deployment of more renewable energy and storage.
@ Distributed Energy

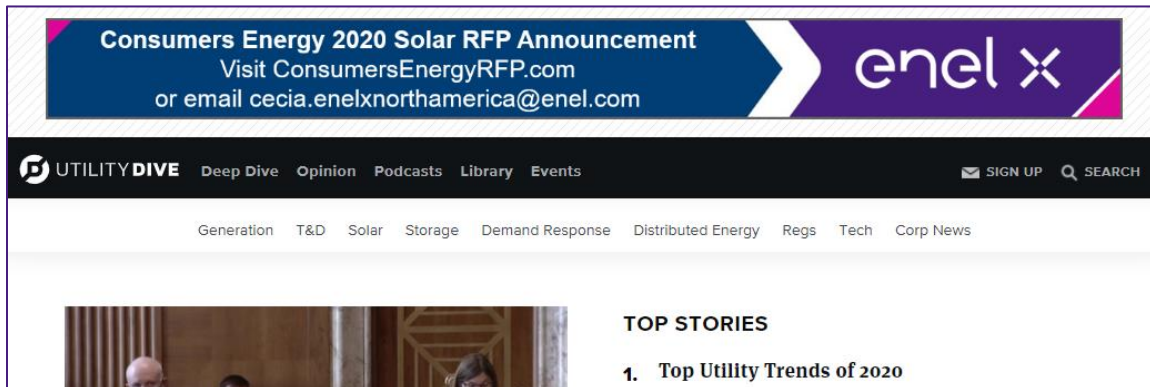
Consumers Energy 2020 Solar RFP Announcement
Visit [ConsumersEnergyRFP.com](https://www.consumersenergyrfp.com)
or email: ceia.enelx@consumers.com
enel x

GET THE NEWSLETTER
Subscribe to Utility Dive to get the must-read news & insights in your inbox.
Enter your work email
Sign up

MOST POPULAR

1. Ohio political scandal nicks AEP stock price; FirstEnergy CEO clarifies defense as shares languish
2. APS says runaway thermal event caused 2019 battery explosion, outlines 4 steps to avoid a repeat
3. \$442M EV charging plan for SCE, largest among California utilities, nears state approval
4. Utilities must prioritize customer experience to advance role of electric vehicles on the grid: experts
5. Trump to nominate Democratic, Republican appointees to FERC

Above: Native Advertisement, Below: Banner Advertisement



The publication of RFP advertisements marked the conclusion of the Preparation Phase, at which point the RFP process pivoted into its second stage, the Solicitation Phase.

Changes to 2020 Solar Solicitation

A number of RFP process improvements were proposed and implemented following the 2019 Solar Solicitation. One of the more meaningful changes to the 2020 Solar Solicitation process was in the form of the introduction of a three-stage pre-qualification process as a screening and gatekeeping mechanism prior to the commencement of the PPA and BTA bidding windows. This three-stage qualification process was designed to ensure that 1) Respondent organizations have sufficient technical and financial capabilities to support to-be-proposed projects, 2) proposed projects meet or exceed all minimum requirements outlined within the RFP, and 3) Respondents are able to a) sufficiently cover proposal exposure with adequate pre-bid security, b) attest to having met all Solicitation requirements, and c) honor all non-negotiable sections of the Consumers Energy contract templates.

This three stage pre-qualification process was designed to support the proactive collection of various forms and proposal details earlier in the process than in the 2019 Solar Solicitation ensuring that all would-be Respondents and their proposed projects have been thoroughly reviewed prior to the conduction of the PPA and BTA pricing events.

Respondents that timely and fully satisfy all relevant prerequisite requirements associated with each stage of the qualification process received formal Notices to Proceed within subsequent stages of the Solicitation process leading up to the proposal submittal windows.

Another notable change to the 2020 Solar Solicitation process is the introduction of a Binding Affidavit, one of the required forms within the Appendix C document package associated with Stage 3 pre-qualification. Respondents will be required to submit binding affidavit attesting to, among other statements, the validity of provided project information and agreeing to honor all non-negotiable contract terms and conditions established by Consumers Energy within the RFP and all supporting appendices.

The final primary 2019-to-2020 change in the Solar Solicitation process is the introduction of live auction event in support of PPA proposal collection. Proposals for PPA contracts were to be submitted via a live online



reverse auction hosted on the Enel X Solicitation Platform. BTA proposals were still to be collected via a sealed bid event hosted on the Enel X Solicitation Platform.



Solicitation Phase

The Solicitation Phase of the Consumers Energy 2020 Solar Solicitation process covered a wide range of tasks from the issuance of a preliminary RFP notice on July 9, 2020 through the end of the proposal submission window on October 22, 2020.

During the Solicitation Phase, the Consumers Energy RFP was formally issued, would-be Respondents were engaged by Enel X through various communications channels, Respondent Qualification Applications, Project Qualification Applications, Binding Bid Agreements and Binding Respondent Affidavits and associated Respondent and Project pre-qualification materials were collected, a formal Questions and Answers process was managed, pre-bid credit was collected, proposals were submitted, and an initial IRP solicitation summary was generated, among a host of other support tasks.

RFP Issuance

On July 9, 2020, a preliminary RFP notice was distributed via email by Enel X to the previously developed RFP listserv. The preliminary RFP notice contained general details regarding the soon-to-be-released RFP and associated documents as well as the email address for the Independent Administrator. Enel X made note of undeliverable email notices and worked to obtain substitute email addresses for such organizations with invalid email addresses and/or contacts.

On July 29, 2020, a formal RFP release notice containing Solicitation Website access instructions was distributed via email by Enel X to the RFP listserv, at which point the public Solicitation Website and an initial set of RFP documents and materials were made accessible on the Enel X Solicitation Platform (usernames and passwords were not required to access such content). The following materials were included within the initial set of RFP documents and materials made available on July 29, 2020:

1. Consumers Energy Company 2020 Solar Generation Projects RFP
2. Appendix A: Respondent Qualification Application - Due by 5:00 PM EPT on August 5, 2020
3. Appendix C: Binding Bid Agreement and Binding Respondent Affidavit
4. Appendix D-1: Build Transfer Agreement Pricing Bid Form
5. Appendix D-2: Power Purchase Agreement Pricing Bid Form
6. Appendix H: Build Transfer Agreement Technical Specifications
7. Appendix I: Exceptions to Build Transfer Agreement Technical Specifications
8. Appendix J: Value Added Criteria Qualification Form
9. Appendix K: Acceptable Manufacturers List Process
10. Appendix L: Low Income County List

On August 12, 2020, the following materials were issued and posted to the Solicitation Website:

1. Appendix B-1: Project Qualification Application
2. Appendix B-2: Project Qualification Database
3. Appendix F: Power Purchase Agreement (Transmission) Template
4. Appendix G: Power Purchase Agreement (Distribution) Template



On August 17, 2020, the following materials were issued and posted to the Solicitation Website:

1. Appendix E-1: Build Transfer Agreement Term Sheet
2. Appendix E-2: Build Transfer Agreement Template

All parties could access the initial Solicitation Platform website without restriction and without any prerequisite set up work by Enel X (in the same fashion any public website could be accessed). By hosting and promoting (via advertisement) a public RFP website, Enel X ensured that all potential Respondents and other interested parties could access all RFP materials – even if they were not included on the initial RFP listserv.

Solicitation Platform

The Solicitation Platform for the 2020 Solar Solicitation is the Enel X Exchange. For the purpose of the 2020 Solar Solicitation, a public Solicitation Website (accessible without a username and password) was hosted on the Solicitation Platform. The Solicitation Website is further described below. Respondents that were pre-qualified to participate in this RFP received unique usernames and passwords to access the Solicitation Platform. Only pre-qualified Respondents received usernames and passwords to the Solicitation Platform and the required permissions needed to submit proposals. Bidding instructions and demonstration materials were posted on the Solicitation Platform. Multiple demonstrations of the proposal submission process were held for pre-qualified Respondents. Respondents participating in the PPA Live Reverse Auction Event were provided with additional information and training on the use of the Platform prior to participation.

Solicitation Website

The Enel X public Solicitation Website containing all Consumers Energy RFP information and associated documents, materials was published on July 29, 2020. The Solicitation Website served as a central RFP data repository throughout the Solicitation Phase and provided all Respondents with a single-site resource for accessing all RFP content necessary to participate within the 2020 Solar Solicitation process and submit proposals.

By utilizing a single site to host all relevant RFP information and documents, Enel X was able to ensure that all Respondents received access to the same materials at the same time. Further, any RFP materials that received updates or amendments were uploaded to the Solicitation Website and notice of their upload was published via email from Enel X, ensuring that parties did not work off of stale versions of amended documents.



ANNOUNCEMENT VIEW: 15863 - CONSUMERS ENERGY COMPANY - 2020 REQUEST FOR PROPOSALS FOR SOLAR GENERATION PROJECTS - AWARD SELECTIONS TO BE CONVEYED TUESDAY, NOVEMBER 24, 2020

Introduction

RFP Overview:

Consumers Energy Company ("Consumers Energy" or the "Company") will seek competitive bids in response its Request for Proposals ("RFP") from participants in the MISO Energy Market in accordance with the Company's Proposed Course of Action in its Integrated Resource Plan. Enel X North America, Inc. ("Enel X") will administer the solicitation through this Solicitation Website on Consumers Energy's behalf in accordance with the RFP, currently hosted in the 'Documents' section of this website. With this RFP, Consumers Energy will solicit proposals for solar generation projects as described within the posted RFP. Responses to the upcoming RFP will only be accepted through the Enel X Solicitation Website.

Company Background:

Consumers Energy is the principal subsidiary of Jackson-based CMS Energy Corporation and is Michigan's largest energy provider, providing electricity and/or gas to almost 7 million of the state's 10 million residents in all 68 counties in the Lower Peninsula. Consumers Energy provides electric service to 1.8 million customers and serves 275 cities and villages in 61 counties. The Company operates 5 coal-fueled generating units, two oil/gas-fueled and two gas-fueled generating units, 13 hydroelectric plants, a pumped storage electric generating plant, two wind-powered energy parks, three solar photovoltaic generation systems and several combustion-turbine plants that produce electricity when needed during peak demand periods. The Company also purchases power from several independent power producers through long term power purchase agreements.

RFP Purpose and Background:

The purpose of this Consumers Energy RFP is to 1) solicit offers for Consumers Energy to acquire solar generation projects and/or solar power purchase agreements ("PPAs") backed by projects located in that portion of the lower peninsula of the State of Michigan that is serviced by the Midcontinent Independent System Operator (MISO) and 2) solicit offers for PPAs with PURPA qualifying facilities 20MW and below located within Consumers Energy's service territory. Proposals located within this region (MISO's Local Resource Zone 7) are requested to support Consumers Energy's IRP. With this RFP, Consumers Energy is seeking to acquire solar generation projects and PURPA qualifying facilities that provide the lowest net costs to its customers. The structures that Consumers Energy will consider to accomplish the foregoing objectives are described in more detail in Section 6 of the RFP document.

Requested Proposals, Projects:

Consumers Energy seeks to acquire up to 300 MW of additional aggregate nameplate capacity projects with commercial operation dates on or before May 31, 2023, all located in the State of Michigan's Lower Peninsula to support Consumers Energy's IRP. Of the 300 MW solicited, at least 150 MW will be acquired through long-term PPAs.

The Solicitation Website remained publicly accessible through the duration of the Respondent Pre-Qualification window. Following the Respondent Pre-Qualification window and the issuance of Stage 1 Notices to Proceed, the Solicitation Website became private (accessible behind-the-password) and Respondents in receipt of Stage 1 Notices to Proceed received user accounts to access the private version of the Solicitation Website.

Respondent Engagement

Enel X made best efforts to engage every invited Respondent individually to ensure receipt of the RFP notice, confirm that they were able to access the Solicitation Website and RFP materials, provide platform training sessions, ensure Respondents were aware of the RFP schedule and milestones, and encourage any open/outstanding questions to be submitted for inclusion within the Questions and Answers log. Enel X also distributed numerous email reminders to all invited Respondents to provide alerts regarding upcoming scheduling milestones and approaching 2020 Solar Solicitation events.

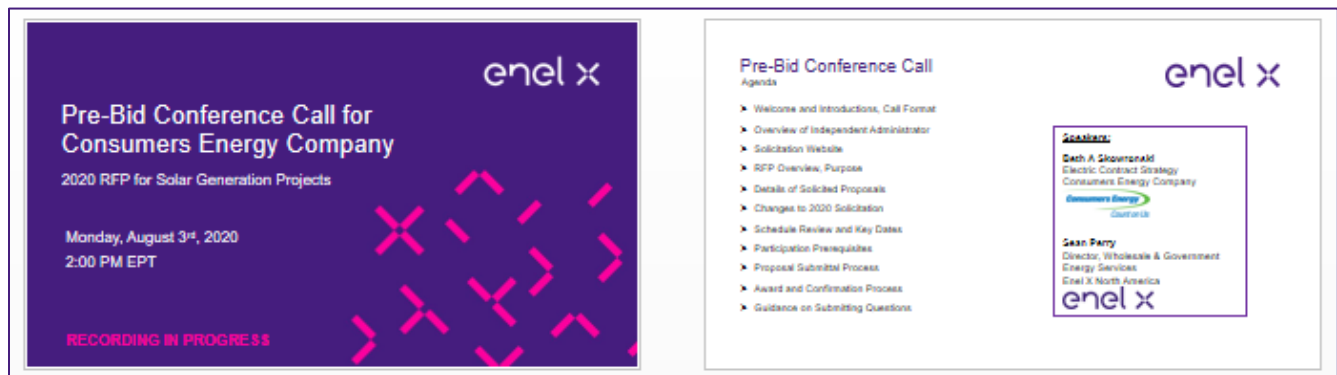
The Enel X Independent Administrator team was accessible to Respondents throughout the 2020 Solar Solicitation process through a variety of communications channels to provide Respondents with any level of required support and guidance.



Pre-Bid Conference Call

On August 3, 2020, Enel X and Consumers Energy hosted a publicly accessible pre-bid conference call for all interested parties. A recording of the pre-bid conference call was posted on the Solicitation Website the following day, August 4, 2020, for those that were unable to attend the call live. Nearly 70 individuals attended the pre-bid conference call live and numerous other individuals downloaded a recording of the call afterwards.

During the Pre-Bid Conference Call, Consumers Energy and Enel X reviewed pertinent details regarding Consumers Energy RFP for Solar Generation Projects and discussed various RFP participation requirements. While some questions were submitted during the pre-bid conference call, such questions were added to the central Questions and Answers log and not addressed live during the call.



Questions and Answers Log, Process

A formal Questions and Answers process was launched alongside the issuance of the Consumers Energy RFP on July 29, 2020. All parties were able to submit questions to the central Independent Administrator email account.

Enel X fielded, collated, anonymized, and provided answers to questions on Consumers Energy's behalf when able within a centrally hosted Questions and Answers document. In the event that Enel X was unable to answer a question, such questions were provided to Consumers Energy for guidance while masking any identifying characteristics of the question submitter. All questions submitted and answers provided were approved by Consumers Energy prior to posting.



**** QUESTIONS ADDED UNDER VERSION 4 OF THE Q&A LOG ****

Q43: If a project currently has a queue position in DPP1 moving to DPP 2, and the project is expecting to obtain a second queue position for additional capacity at the same POI with a future DPP entry that has not occurred due to Queue delays, is the second position disqualified under the last sentence of the second paragraph, of Section 5.4?

A43: The capacity associated with the second position is not eligible to participate because it has not met the interconnection screening criteria. The capacity associated with the current DPP1 queue position is eligible to participate as long as the project is not withdrawn from the interconnection process and continues to move forward through the interconnection process.

Q44: Does Consumers plan to have full approval at the time of PPA execution-June 30, 2021? Can Consumers provide insight regarding this timeline for execution?

A44: No, Consumers Energy cannot guarantee the timing of the approval of the PPA, as it is subject to regulatory review by the MPSC. Following execution of the PPA, the Company will file for approval of the PPA with the MPSC.

Q45: Would Consumers consider purchasing the pro-rata output of a project under a PPA, versus 100% of the output (i.e. output from 50 MW/125 MW or 40% of total project output)?

A45: Yes, Consumers Energy would consider purchasing from a partial facility under a PPA, but not under a STA. The template PPAs provided as Appendices F and G are intended to accommodate this type of pro-rata arrangement.

Q46: Does Consumers Energy have any preference for CODs earlier than the 5/31/2023 deadline? If so, is an earlier COD only preferred if it can participate in that year's MISO capacity period from June through August? In other words, is a 2022 (or 2021) COD only preferable if by 5/31/2022 (or 2021) and not 12/31/2022 (or 2021)?

A46: Consumers Energy is willing to accept proposals with a COD earlier than the 5/31/2023 deadline. The evaluation tool is set up to address an earlier start date for the ranking of proposals. However, there are no additional VAC or other preference taken into account for proposals that can achieve an earlier start date.

Q47: Does Consumers Energy require that a project/facility has already obtained its QF status?

A47: No, however, the facility will need to achieve QF status prior to COD and maintain QF status through the term of the agreement. Proposals will not be accepted from facilities less than 20 MW that cannot reasonably be expected to obtain QF status in accordance with the applicable Federal Energy Regulatory Commission rules, procedures, and requirements for QF certification.

Q48: Can a project be submitted that is in development which meets the requirements of a QF but has not submitted the Forms and Fees to register that facility as a QF through FERC?

A48: Please see the response to Q47.

Q49: If a facility would be connected to the local distribution lines and not MISO, do you require the Category 5 interconnection study with Consumers to be completed in order to submit the project?

A49: To meet the screening criteria for proposal eligibility, the project needs to have a completed Engineering Review, which is the first stage of the Company's distribution interconnection study process. The Distribution Study, which is the second stage of the study process, may still be outstanding.

Q50: The RFP states that a Completed Engineering Review is required, is that PE stamped engineering documents of the development side or is that a fully completed Interconnection Study?

A50: The project one-line diagram must be sealed by a professional engineer licensed in the State of Michigan. This is confirmed during the application review process that precedes the Engineering Review step. Please also see the response to Q45.

Q51: "Section 1.6.3.1.4 of the Technical Specifications (Appendix H) requires only the use of SolarAnywhere 3.4 data in PVsyst modeling." Can other data sets be used as long as SA v3.4 data is addressed in the analysis?

A51: The SolarAnywhere V3.4 solar resource data must be selected as the input to the PVsyst model. Alternative data sources or modified data sets shall not be permitted as the basis for the energy production estimate.

Q52: Section 8.3.6 of the RFP Document states that projects that have COD dates delayed due to transmission system network upgrades may still be acceptable for this RFP. Could that mean that a project that was submitted into the MISO 2020 study queue and hypothetically tendered a GIA with an online date later than 5/31/20 solely due to transmission network upgrades could be considered? If so, are projects that do meet the mid-year COD timeline granted any special or favorable evaluation bonus?

A52: All proposals are required to meet the interconnection status screening criteria regardless of the projected COD. Proposals will be accepted for projects that have CODs later than May 31, 2023 if the delay in COD is due solely to delays caused by the completion of network upgrades. Proposals will not be accepted for projects with projected CODs that occur later than December 31, 2023 regardless of the cause of the delay in COD. Projects that meet mid-year COD are not granted any special bonus or consideration, however the evaluation tool will not recognize capacity revenue for MISO Planning Year 2023 for proposals with CODs that are expected to occur after May 31, 2023 which will have an impact to the final ranking of the proposal.

Q53: How much flexibility does one have on the information submitted within the Project Qualification Application? Can output information be updated? Do we have the ability to submit additional projects after the August 25th deadline?

A53: There is limited flexibility on information submitted within the Project Qualification Application post submission of the information. The permissibility to update information will be determined on a case by case basis. Respondents must inform Enel X of any anticipated changes to the project as soon as possible to determine if the proposal's eligibility will be affected and, if applicable, what additional information is required to be provided by the

A total of 53 unique questions (many parties submitted substantively the same question/questions) were received and addressed across three different issuances of the Questions and Answers log. Each time an updated Questions and Answers log was made available on the Solicitation website a correspondent email notice was issued to the RFP listserv to ensure all parties were aware of its publication.

Respondent, Project, and Contract Template Pre-Qualification

In order to achieve pre-qualification status and obtain permission to submit proposals, RFP Respondents were required to meet a number of participation prerequisites and partake in a multi-stage qualification process consisting of a Respondent Qualification Stage (Stage 1), a Project Qualification Stage (Stage 2), and a Contracts and Bid Security Qualification Stage (Stage 3).

The three-stage qualification process was designed to ensure that 1) Respondent organizations have sufficient technical and financial capabilities to support to-be-proposed projects, 2) proposed projects will be able to meet or exceed all minimum requirements outlined within the 2020 Solar Solicitation, and 3) Respondents are able to a) sufficiently cover proposal exposure with adequate pre-bid security, b) attest to having met all



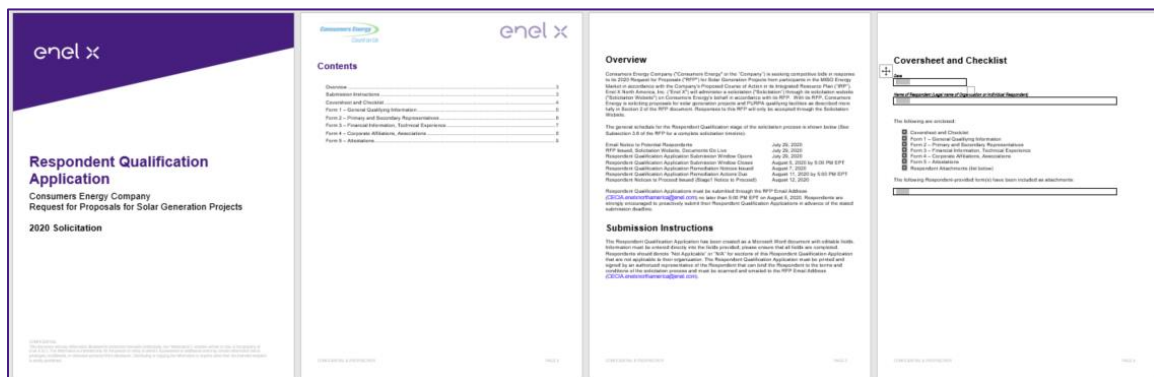
Solicitation requirements, and c) honor all non-negotiable sections of the Consumers Energy contract templates.

Respondents that timely and fully satisfied all relevant prerequisite requirements associated with each stage of the qualification process received formal Notices to Proceed within subsequent stages of the Solicitation process leading up to the proposal submittal windows. Respondents that ultimately received Stage 3 Notices to Proceed were granted permissions to submit executable proposals for award consideration.

Respondent Qualification Stage (Stage 1)

Respondents interested in participating within the 2020 Solar Solicitation were required to be pre-qualified and meet all relevant participation pre-requisites outlined within the RFP and communicated by Enel X. Respondent organizations were required to complete and submit a Respondent Qualification Application, including Forms 1 through 5 by August 5, 2020.

The Respondent Qualification Application included a Credit Pre-Qualification Application, a non-binding form that Respondents must complete and submit to provide pertinent details of their organization that could be used by Consumers Energy to conduct credit evaluations.



The following five forms were contained within the Respondent Qualification Application document package:

- **Form 1 – General Information**
 - Within Form 1 of the Respondent Qualification Application, Respondents are asked to provide general information about their organization. Respondents were able to attach additional sheets and materials if-needed.
- **Form 2 – Contact Information**
 - Within Form 2 of the Respondent Qualification Application, Respondents are asked to provide complete contact information of the primary and secondary RFP representatives within their organization. Assigned Representatives received all communications and were granted permissions to act on the entity's behalf.
- **Form 3 – Financial Information**
 - Form 3 of the Respondent Qualification Application captured financial and credit related information regarding each Respondent organization. Additionally, Respondents were asked to



provide details regarding their technical experience in developing utility scale solar projects. Respondents were able to attach additional relevant materials if-needed to cover all requested content outlined within Form 3.

- **Form 4 – Respondent Organization Affiliations**

- Form 4 of the Respondent Qualification Application provided a means for Respondents to disclose any direct or indirect affiliations held with other prospective Respondents. If affiliations were identified, Respondents were required to provide further detail in the comments section at the bottom of Form 4 to describe the nature of said affiliations.

- **Form 5 – Attestations**

- Within the final form of the Respondent Qualification Application, Form 5, Respondents must review and agree to four attestations before printing, signing, scanning, and sending their completed Respondent Qualification Application.

Enel X reviewed the information provided by Respondents within submitted Respondent Qualification Applications and worked with select Respondents to clarify various Notice of Intent form contents as-needed, if-needed.

Following the Respondent Qualification Application submission deadline, a formal remediation period began. Within the remediation period, Enel X provided Respondents with a list of both requests for clarifications and any open remediation needs. Respondents had an opportunity to provide clarifying guidance and/or cures to any identified remediation need(s) prior to the determination and ultimate issuance of Stage 1 Notices to Proceed.

Respondents that met all relevant requirements of the Respondent Qualification Stage received a Stage 1 Notice to Proceed and were provided with detailed information regarding the next steps within the Solicitation Process, including a formal invitation to participate within the Project Qualification Stage (Stage 2).

Respondent Qualification Applications Submitted

The following table details a summary of the submitted Respondent Qualification Applications received by Enel X in advance of the August 5, 2020 submission deadline. No Respondent Qualification Applications were received by Enel X after August 5, 2020 nor were any Respondents denied permission to participate within the RFP process due to inability to meet the Respondent Qualification Application submission deadline (given that all interested parties submitted required forms by August 5, 2020).

Criteria	Value
Total Number of Pre-Qualified Respondents	30

Respondents that submitted Respondent Qualification Applications received receipt confirmation notices from Enel X, which contained a summary of next-steps within the RFP process.

Project Qualification Stage (Stage 2)

Qualified Respondents were required to complete and submit a Project Qualification Application, including Forms 1 through 4 and a Project Qualification Database by August 25, 2020.





The following four forms were contained within the Project Qualification Application:

- **Form 1 – Summary of Project(s), Value Added Criteria**
 - Within Form 1 of the Project Qualification Application, Respondents are asked to provide detailed information about their proposed projects and applicable Value Added Criteria within the Appendix B-2 Project Qualification Database.
- **Form 2 – Additional Project Details**
 - Within Form 2 of the Project Qualification Application, Respondents were asked to provide specific details regarding their Organization's experience in developing similar projects and any potential impediments that could have prevented specific projects from being qualified to bid in the RFP.
- **Form 3 – Acknowledgement of Required Project-Specific Documentation**
 - Form 3 of the Project Qualification Application provided a check list of Required Project Documents each Respondent was responsible to provide in separate files.
- **Form 4 – Attestations**
 - Within the final form of the Project Qualification Application, Form 4, Respondents were required to review and agree to four attestations before printing, signing, scanning, and sending their completed Project Qualification Application to Enel X.

The Project Qualification Application also included a supplementary Excel database (Appendix B-2) used to gather pertinent project-specific details of Respondent-proposed projects and intended Value Added Criteria claims.



 				
Consumers Energy Company - 2020 RFP for Solar Generation Resources				
Project Qualification Phase				
Details of to be Proposed Projects - All Applicable Cells Must be Completed				
Fields Required for Both PPA and BTA Project Proposals				
Project Number	Name of Respondent (Per Respondent Qualification Application)	Name of Project	Name of Project Owner(s)	Project Address
1				
2				
3				

Project Qualification Applications Submitted

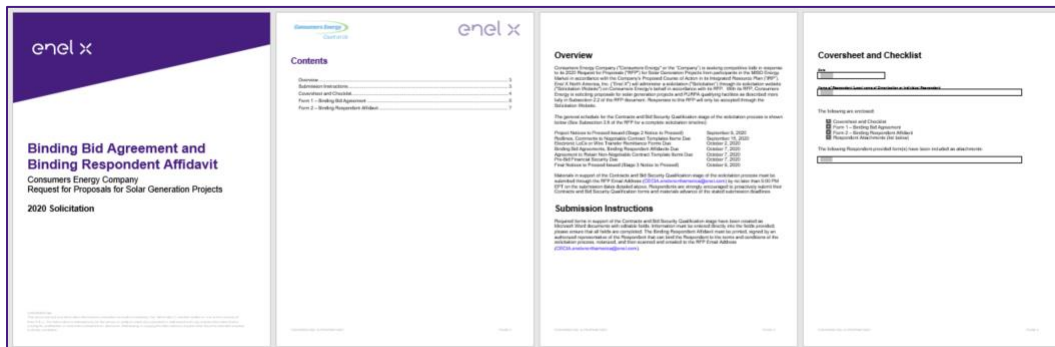
The following table details a summary of the submitted Project Qualification Applications received by Enel X in advance of the August 25, 2020 submission deadline. No Project Qualification Applications were received by Enel X after August 25, 2020 nor were any Respondents denied permission to participate within the RFP process due to inability to meet the Project Qualification Application submission deadline (given that all interested parties submitted required forms by August 25, 2020).

Criteria	Value
Total Number of Pre-Qualified Respondents	30
Total Number of Submitted Project Qualification Applications	19
Total Number of Proposed Projects	43
Number of PURPA QF (Up to 20 MW)	13
Number of Solar Generation Facilities (Greater than 20 MW)	30
Total Amount of Proposed Capacity (MW)	2,456.01
PURPA QF Capacity (MW)	65.51
Solar Generation Facilities (Greater than 20 MW) Capacity (MW)	2,390.50

Of the 30 pre-qualified Respondents, 11 elected not to proceed forward within the 2020 Solar Solicitation and, by-choice, did not submit Project Qualification Applications. The 11 Respondents that declined to submit Project Qualification Applications noted a variety of reasons for their decisions – ranging from realization that their proposals did not conform to RFP requirements, language in finalized PPA and BTA contract templates, to simply deciding to pursue other transactional opportunities. Enel X requested additional detail from every Respondent that initially expressed interest in participating within the RFP and later declined, although Respondents often did not provide detailed reasoning(s) behind their withdrawal decisions.

Contracts and Bid Security Qualification (Stage 3)

Qualified Respondents with Qualified Projects were required to complete and submit an Appendix C document package containing both a Binding Bid Agreement and Binding Respondent Affidavit by October 14, 2020.



The following two forms were contained within the Appendix C document package:

- **Form 1 – Binding Bid Agreement**
 - Within Form 1 of the Binding Bid Agreement and Binding Respondent Affidavit, Respondents attested to the terms, conditions and requirements of the provisions defined in the Consumers Energy RFP document and that the Bids submitted will be bound until June 30, 2021.
- **Form 2 – Binding Respondent Affidavit**
 - Within Form 2 of the Binding Bid Agreement and Binding Respondent Affidavit, Respondents attested to the terms, conditions and requirements of the provisions defined in the Consumers Energy contract templates.

Redlines to BTA and PPA Agreements

Qualified Respondents with Qualified Projects were able to submit/propose redlines to certain components of the Consumers Energy contract template for consideration. Consumers Energy reviewed proposed contract template modifications and provided clarifying guidance to Respondents in the form of updated contract templates prior to requiring Respondents to submit their agreement to honor such contract templates (contained within the Binding Respondent Affidavits).

Respondents submitting/proposing redlines to the Consumers Energy PPA and/or BTA contract template were required to submit an Excel file summarizing the nature of their sought contract template changes.

Consumers Energy Company - 2020 RFP for Solar Generation Resources						
Proposed Changes to BTA (Appendix E-1 and E-2) and PPA (Appendix F and G) Contract Templates						
PLEASE NOTE: Consumers Energy will not accept material modifications to the provided BTA template contracts, including but not limited to, essential provisions such as, commercial operation date and regulatory disallowance. The Company will not accept material modifications to the provided PPA template contracts, including but not limited to, essential provisions such as, early termination, indemnity, limitation of liability, commercial operation date and regulatory disallowance.						
Respondent Organization Name						
Contract Template	Page Number	Primary Section	Subsection	Input Existing Contract Language for which Changes are Desired	Summarize Nature of Sought Change(s) to Referenced Contract Language	If Sought Change are NOT Allowed, Would Respondent Accept Existing Language if selected for Award (Yes/No)?
PPA Template (Distribution) - Appendix F						
PPA Template (Transmission) - Appendix G						
BTA Term Sheet - Appendix E-1						
BTA Template - Appendix E-2						



Proposed modifications to the Consumers Energy contract templates were due September 15, 2020. Of the 19 Respondents that could have submitted proposed modifications (Respondents having at least one pre-qualified project), nine Respondents submitted multiple changes for the PPA contract language and eight Respondents submitted multiple changes for the BTA contract language.

While the Consumers Energy RFP provided examples of material modifications that would not be considered, a comprehensive list of unacceptable contractual changes was not provided. Further, Enel X elected not to qualify or determine the acceptability of redlined contract changes on behalf of Consumers Energy or pursue contractual discussions related to certain redlined changes.

Enel X compiled an anonymized summary of Respondent-proposed changes to the Consumers Energy contract templates and provided its prepared summary to Consumers Energy on September 17, 2020. Consumers Energy reviewed Respondent-proposed changes to its contract templates and elected to update its PPA contract templates in response to Respondent-proposed changes.

Updated PPA contract templates were circulated to Respondents by Enel X on October 6, 2020. All PPA proposal pricing was required to be based on the updated PPA contract templates and any Respondents selected for PPA contract awards were required to honor said templates (as stated in Sections 7.4 and 6.9 of the Consumers Energy RFP). The BTA Term Sheet and BTA Template were not updated. Following distribution of contract template guidance on October 6, 2020, Respondents had until October 14, 2020 to agree to honor the material terms contained within the contract templates by way of attestation via the Binding Respondent Affidavit (Form 2 of the Appendix C document package).

As stated in Section 9.3 of the Consumers Energy RFP, Consumers Energy's commencement of and participation in negotiations with Respondents selected for preliminary award shall not be construed as a commitment to execute a contract. Only execution of a definitive agreement by both Consumers Energy and the Respondent on mutually acceptable terms will constitute a "winning proposal". As such, Respondents and Consumers Energy are afforded opportunity to establish mutually acceptable forms of contract during due diligence discussions.

RFP Application Fees

Respondents submitting proposals for solar generation facilities with capacities greater than 20 MW were required to pay a non-refundable RFP application fee of \$300.00 for each project that it intended to offer through the 2020 Solar Solicitation. Respondents submitting proposals for PURPA qualifying facilities with capacities less than 20 MW were required to pay a non-refundable application fee of \$150.00 for each project that it intended to offer through the 2020 Solar Solicitation.

Respondents that did not submit owed application fees in-full prior to the remittance deadline outlined within the Enel X invoice (September 15, 2020) were to be disqualified from submitting proposals through the 2020 Solar Solicitation. Out of the 19 Qualified Respondents that submitted Project Qualification Applications, one declined to continue forward in the RFP process and did not ultimately submit RFP application fees. In total, 18 Respondents submitted RFP application fees for to Enel X. No Respondents were denied permission to participate further within the RFP process due to inability to post RFP application fees in a timely manner.

Appendix C Document Packages Submitted



The following table details a summary of the submitted Appendix C document packages received by Enel X in advance of the October 14, 2020 submission deadline. No Appendix C document packages were received by Enel X after October 14, 2020 nor were any Respondents denied permission to participate within the RFP process due to inability to meet the Appendix C document package submission deadline (given that all interested parties submitted required forms by October 14, 2020).

Criteria	Value
Total Number of Qualified Respondents with Qualified Projects	19
Total Number of Respondents Submitted Application Fees	18
Total Number of Respondents Submitted an Appendix C	12

Of the 18 pre-qualified Respondents with pre-qualified projects that had submitted RFP application fees, six elected not to proceed forward within the 2020 Solar Solicitation and by-choice did not submit Appendix C document packages. The six Respondents that declined to submit Appendix C document packages noted that the requirement to agree to honor the material terms contained within the Consumers Energy contract templates as a primary reason for their withdrawals.

Pre-Bid Security Collection

All Respondents were required to post pre-bid credit in United States Dollars ("USD"). Respondents were only given the option to remit cash collateral to satisfy pre-bid credit requirements.

The pre-bid credit posting requirement for all Respondents was set at \$1,500 per MW proposed. As an example, a Respondent submitting multiple proposals with a cumulative offer capacity of 200 MW would be required to post \$300,000 in pre-bid security. Pre-bid credit posting amounts are unique to the projects being proposed – i.e. a Respondent proposing the same project via PPA and BTA arrangements did not need to post double the amount of pre-bid security.

All Qualified Respondents with Qualified Projects were required to post Pre-Bid Security credit posting cash deposits were detailed within the RFP document and posted on the Solicitation Website. Interest was not to be paid on any pre-bid credit provided.

Failure to provide a Pre-Bid cash deposit would have resulted in Respondent's disqualification from further participation within the RFP. Pre-bid credit for parties selected for provisional award is to be held through the execution of definitive agreements. Pre-bid credit for parties not selected for award will be returned following the conclusion of the Valid Proposal Duration (June 30, 2021).

All 12 of the Respondents that submitted Appendix C Document packages continued forward in the 2020 Solar Solicitation and posted required pre-bid security.

No Respondents were denied permission to participate further within the RFP process due to inability to post required pre-bid security in a timely manner. Further, Respondents were able to make adjustments if needed to pre-bid security in advance of pre-qualification determinations should their intended offer plan within their Intent to Bid package change.



Final Pre-Qualification Statuses

A total of 12 Respondents were eligible to receive Stage 3 Notices to Proceed and permission to offer proposals within the Consumers Energy RFP. All 12 Respondents received Stage 3 Notices to Proceed and permissions to submit proposals in either the PPA Live Reverse Auction Run on the Enel X Solicitation Platform on October 20, 2020 and/or the BTA Sealed Bid Event Run on the Enel X Solicitation Platform on October 22, 2020.

Criteria	Value
Total Number of Respondents Receiving Stage 3 Notices to Proceed	12
Number of Respondents Qualified for PPA Submission	10
Number of Respondents Qualified for BTA Submission	10

Within the Stage 3 Notice to Proceed status emails from Enel X, Respondents were provided with a summary of the pre-bid security they posted, a maximum allowed aggregate offer capacity, an Enel X Solicitation Platform username and password, and a detailed Enel X Solicitation Platform user guide (proposal submittal guide).

Proposal Submissions

PPA Proposals

All PPA proposals were required to be submitted through a live auction process in order to remain in consideration within the Consumers Energy 2020 Solar Solicitation. The PPA live auction event opened at 10:00 AM EPT on October 20, 2020 and concluded at 11:00 AM EPT on October 20, 2020. Within the PPA live auction event, Respondents were required to submit pricing in the form of a net levelized energy price in dollars per megawatt hour (\$/MWh) for each submitted project proposal.

After submitting initial bids within the PPA auction event, Respondents were provided with visibility to the prevailing best bid amount within the PPA auction event and were able to monitor movements to the prevailing best bid amount and respond accordingly during the bidding window.

Additionally, all supporting PPA bid forms and required proposal contents were due by 5:00 PM EPT on October 20, 2020. Respondents were able to either attach proposal files and contents to an email or provide a link to a shared filed site within an email directly to Enel X via cecilia.enelxnorthamerica@enel.com.

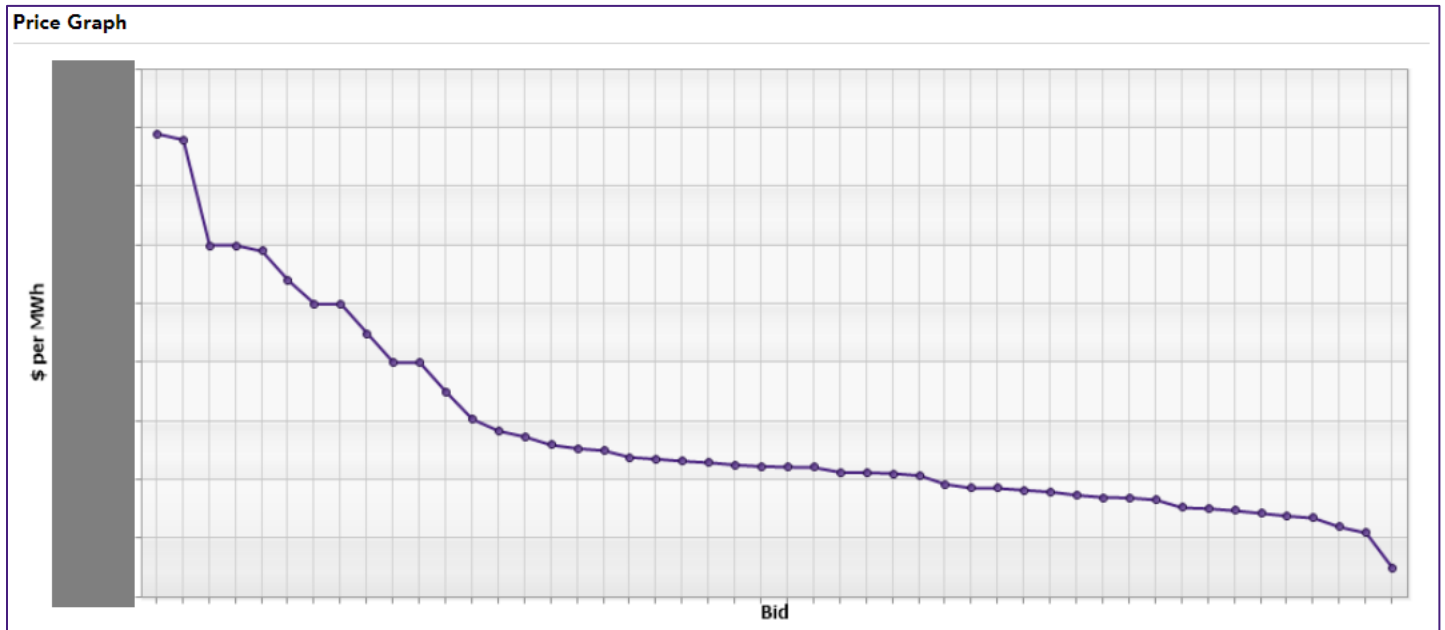
Enel X contacted all participating PPA auction bidders to ensure readiness on the day of the auction event and all Respondents intending to submit PPA proposals were able to successfully submit their proposals within the auction event. A total of nine Respondents submitted PPA proposals for 19 unique projects within the PPA auction event. A total of 48 bids were placed within the hour long PPA auction event.

Representatives from Consumers Energy were able to observe anonymous bidding activity within the PPA auction event and monitor the auction event during the hour long bidding window. Feedback conveyed to Consumers Energy during the live auction event was limited to the prevailing best bid (net levelized energy price), a graphical representation of submitted bids as shown below, and a live clock showing the time



remaining within the auction event. Consumers Energy was not able to observe any data regarding the identities of participating Respondents.

A redacted PPA auction price graph showing the total number of bids placed within the 2020 Solar Solicitation PPA auction event is detailed below.



BTA Proposals

All BTA proposals were required to be submitted through a sealed bid process in order to remain in consideration within the Consumers Energy 2020 Solar Solicitation. The BTA sealed event remained open from 10:00 AM EPT until 5:00 PM EPT on October 22, 2020. Within the BTA sealed event, Respondents were required to upload all relevant proposal documents within the Solicitation Platform.

A total of ten Respondents submitted BTA proposals for 21 unique projects within the sealed BTA event.

Preliminary Solicitation Summary

On October 19, 2020, Enel X distributed a preliminary, blind (all Respondent-identifying data removed) 2020 IRP Solicitation Summary containing the aggregate number of projects offered, the aggregate number of Respondents, aggregate MW totals, and a summary of deltas between the 2019 and 2020 Solar Solicitations.

The following bulleted list and summary points detail key components of the Preliminary Solicitation Summary prepared/provided to Consumers Energy on October 26, 2020:

- Total Number of Unique Respondents: 12 (compared to 13 in 2019 Solar RFP)
- Total Number of Unique Projects: 23 (compared to 34 in 2019 Solar RFP)
 - Total Number of PURPA QFs: 5 (compared to 15 in 2019 Solar RFP)
 - Total Number of Projects to be Offered via PPA: 19



- Total Number of Projects to be Offered via BTA: 21
- Total Amount of Qualified Capacity (MW): 1,683.10 (compared to 1,883.33 in 2019 Solar RFP)

Enel X noted small year-over-year decline in total numbers of Respondents, projects, and cumulative project capacity, although the caliber and maturity of proposed projects submitted within the 2020 Solar Solicitation was stronger. Declines in total project count were driven near solely by reduced quantities of PURPA QFs being offered through the 2020 Solar Solicitation, with 10 fewer PURPA QFs offered via the 2020 Solar Solicitation versus the 2019 Solar Solicitation. The decline in offered PURPA QFs is not as notable when considering the one-to-many relationship typically seen with Respondents offering PURPA QFs (as an example, it is not uncommon to see the same Respondent propose five to seven PURPA QFs).

Conclusion of Solicitation Phase

Enel X affirms that all Respondents in receipt of Stage 3 Notices to Proceed, apart from Respondents withdrawing from the solicitation process voluntarily, were able to successfully submit proposals within the Enel X Solicitation Platform. No Respondents were denied the ability to submit proposals or otherwise limited in their ability to submit proposals, apart from self-derived constraints (posted bid security, application fees, etc.).

Enel X also affirms that throughout the Solicitation Phase, no detail was provided or shared with Consumers Energy containing any Respondent-identifying information that could create any selection bias.



Evaluation Phase

The Evaluation Phase of the Consumers Energy RFP process spanned from October 22, 2020 through November 24, 2020, with primary components of the Evaluation Phase encompassing the initial screening of submitted proposals and the preparation and delivery of blind final evaluation results to Consumers Energy.

Initial Screening for Eligibility

Given the level of detail provided within the Consumers Energy RFP materials regarding proposal/project requirements and the full slate of Respondent prerequisite participation requirements, Enel X observed that Respondent proposals were naturally 'self-screened' through the 2020 Solar Solicitation process. As highlighted by Respondent and project attrition seen through various RFP stages (Respondent Qualification Application submissions, Project Qualification Application submissions, Appendix C document set submissions, RFP application fee posting, pre-bid credit posting, etc.), numerous Respondents removed numerous projects from the RFP process that did not meet various requirements or had been deemed infeasible.

PPA Proposal Screening

Upon conducting its initial screening to determine proposal eligibility, Enel X noted that one submitted PPA proposal was invalid due to failure of the submitting Respondent to provide required proposal materials. The Respondent that submitted the invalid PPA proposal did not provide any of the required final bid forms or supporting documents to go alongside their proposal.

Enel X informed the submitting Respondent of the ineligibility of their submitted PPA proposal and provided the Respondent with an opportunity to provide missing materials per the Clarification of Proposals section within the RFP (Section 10.1.1). The Respondent in-question did not provide missing proposal materials within the allotted response window and later confirmed intent to Enel X of their desire to withdraw from the solicitation process.

Additionally, another Respondent submitted its two projects with multiple different pricing structures, including structures with pricing escalators and hub settlements (versus project busbar). Per the RFP, Respondents were to provide fixed pricing and, per the PPA Contract Templates, settlement is to occur at the busbar. The Respondent's pricing proposals with escalators and/or hub settlement were deemed ineligible and removed from consideration.

No points of contention or arguments were raised regarding the determination of proposal validity.

BTA Proposal Screening

Upon conducting its initial screening to determine proposal eligibility, Enel X determined that no submitted BTA proposals were ineligible.

Requests for Clarification, Additional Proposal Details



Enel X issued multiple requests for clarification and/or additional proposal details from Respondents that submitted appropriate proposal forms with select fields denoted as either “TBD”, “Confidential”, or fields that were not entirely clear upon review. Additionally, Enel X issued clarification requests to Respondents that did not furnish all required supporting proposal documentation.

All requests for clarification and/or additional proposal details were related to proposal contents not including bid price (either Net Levelized Energy Payment for PPA proposals or Total Build Transfer Pricing for BTA proposals). At no point were any Respondents allowed to change and/or modify their bid price (in the event a Respondent would attempt to do so while providing clarifying proposal data).

Additionally, Respondents were not allowed to modify any proposal terms that would alter the conforming nature of their proposals. Respondents were not given any advantage or disadvantage as a result of the request for clarification process.

Upon consultation with Consumers Energy, Enel X elected to extend the window of time during which Respondents could satisfy requests for clarification to remain eligible within the 2020 Solar Solicitation and revised select dates within the RFP Schedule accordingly.

The selection by Consumers Energy of PPA and BTA Proposals for provisional award, the Distribution of Award Statuses, and the Provision of Selected Proposal Details to Consumers Energy were moved to occur on November 24, 2020. The commencement of Consumers Energy’s Due Diligence Review of Selected Proposals was also moved to occur on November 30, 2020.

The RFP Schedule changes were made in accordance with Section 3.6 (Schedule) and Section 11 (Reservation of Rights) of the RFP to extend the proposal evaluation period to afford Respondents with additional time to satisfy requests stemming from Section 10.1.1 (Clarification of Proposals). Respondents having received requests to provide additional information about technical items within their proposals would now have until 4:00 PM EPT on Tuesday, November 17, 2020 to respond to and satisfy such requests to remain in consideration within the RFP. As stated in Section 10.1 (Initial Proposal Review), Enel X did not accept updated pricing or other material changes from Respondents during this evaluation period.

Blind Final Evaluation Results

During the Final Evaluation Results phase of the Consumers Energy RFP process, Enel X developed ranked lists of each eligible/valid PPA and BTA proposals utilizing the PPA and BTA Economic Models developed by Consumers Energy.

Within the blind Evaluation Results ranking sheets, Enel X included an individual proposal line item for each valid proposal variant. As an example, if a Respondent submitted the same project and proposal format with an offered cost for a 20-yr term and an offered cost for a 25-yr term, each offered variant would be evaluated and each would receive its own proposal identifier and line item within the ranked list. Enel X would make note of proposals bearing mutually-exclusive award consideration under such scenarios.

Through the conclusion of the Solicitation Phase and during both the Evaluation and Selection Phases, Respondents did not have any insight into the total number of Respondents that had submitted proposals into the RFP, the total number, quantity, or type of projects offered, or the ranking of their submitted proposals



against others. As detailed within Section 10.2 of the Consumers Energy RFP, Respondents were aware of the method of which proposals would be evaluated.

Per Section 10.2 of the Consumers Energy RFP; Proposals were to be evaluated based on projected costs, projected commodity value, value added criteria. The economic evaluation would consist of first calculating the total projected cost of a proposal. Second, the projected value of the commodities provided by the proposed project would be subtracted from the total projected cost to calculate a net cost for the proposal. Lastly, the value-added criteria will be subtracted from the net cost to determine the final, adjusted net cost of the proposal. Projects were then be ranked based on their adjusted net cost.

Enel X was to provide two separate blind rankings of proposals, one consisting of PPA proposals and another consisting of BTA proposals. Consumers Energy intended to make its selections based on the blind ranking. Consumers Energy would then select winning proposals in order of lowest to highest adjusted net costs with regards to both blind rankings.

Distribution of Blind Final Evaluation Results

After obtaining responses to the last remaining requests for clarification and additional information by November 17, 2020, a final version of the Blind Evaluation Results file was developed and circulated by Enel X to the Consumers Energy team.

Within the email message to which the final iteration of the blind Evaluation Results file was attached, Enel X detailed the nature of the requests for clarification and additional proposal detail received and the proposals to which such information were attributed. No Respondent-specific data was conveyed nor were any details provided that would reveal any Respondent-identifying data. Enel X also made note of any mutually-exclusive proposal variants.

The final Evaluation Results file distributed on November 17, 2020 served as the basis for ultimate selections.

Within the initial BTA Proposal Evaluation Results, Respondent-provided end of project life assumptions (expected operating life) we taken into consideration while evaluation proposals.

Upon further review and discussion with the Consumers Energy team, the BTA Proposal Evaluation Results were updated to apply the same uniform 25-year operating life and five year salvage value to all project proposals to be able to more uniformly assess project proposals based on Consumer Energy's standard operating life forecasts.

Evaluation Phase Conclusion

Enel X affirms that throughout the Evaluation Phase, no detail was provided or shared with Consumers Energy containing any Respondent-identifying information that could create any selection bias.



Selection Phase

The Selection Phase of the Consumers Energy RFP process primarily consisted of an independent, internal, review of the Final Evaluation Results conducted by Consumers Energy, which culminated in Consumer Energy's conveyance to Enel X of proposals selected from the Final Evaluation Results for preliminary award.

Consumers Energy utilized the final version of the PPA and BTA Proposal Rankings distributed by Enel X on November 17, 2020 to make its preliminary award selections.

PPA Proposal Preliminary Section Methodology

As described in Section 10.3 of the Consumers Energy RFP, Consumers Energy sought to provisionally select PPA proposals for more capacity than it will ultimately execute definitive agreements for in an effort to ensure a timely, successful conclusion to the 2020 Solar Solicitation.

BTA Proposal Preliminary Section Methodology

Consumers Energy ultimately elected to serially select, or select as needed, BTA proposals for provisional award rather than provisionally over-awarding BTA proposals as done with PPA proposals.

Consumers Energy Preliminary Provisional Award Selections

On November 23, 2020, Consumers Energy informed Enel X via email of the proposal(s) it had selected for preliminary award.

All preliminary provisionally awarded proposals represented unique and distinct projects.

Within email notices to Respondents selected for preliminary provisional awards, Respondents were reminded that selection for a "preliminary award" does not mean that the Respondent is guaranteed a contract, as Consumers Energy may preliminarily award more capacity than it ultimately contracts for to expedite the negotiation and due diligence processes.

Enel X Reveal of Preliminary Selected Blind Proposals

On November 23, 2020, Enel X provided Consumers Energy with details of the proposals it selected from the Final Evaluation Results, including the identities of submitting Respondents and associated projects.

Summary tables were provided via email to Consumers Energy on November 23, 2020 for both PPA and BTA preliminary award selections (marking the first time that Consumers Energy has been made privy to proposal details).



Enel X provided Consumers Energy with a cataloged inventory of all relevant proposal materials submitted by the Respondents associated with each selected proposal. Enel X provided such information by way of a secured file sharing site and redacted/withheld any information regarding other projects/proposals submitted by selected Respondents that are not being chosen for preliminary award.

Enel X did not provide Consumers Energy with a complete catalog of all Respondent proposals, as Consumers Energy should remain effectively blind to the proposals not selected for preliminary award (should secondary selections be made).

Preliminary Award Notices

On November 24, 2020, Enel X distributed preliminary award status notices via email to each of the 12 Respondents that submitted proposals into the 2020 Solar Solicitation. The preliminary award status notices for each Respondent contained a listing of the proposals they submitted and a notation regarding whether or not the corresponding proposal had been selected for a preliminary award. Respondents were not able to see any proposal data associated with other Respondents, any detail regarding the ranking of their submitted proposals against selected proposals, or any details regarding number of proposals awarded or the detail of such.

Respondents were advised that, pursuant to Subsection 10.2 of the Consumers Energy RFP; Consumers Energy has made preliminary award selections and will soon initiate a due diligence review of selected proposals and Respondents.

Included within the preliminary award status notifications was language that affirmed that a Respondent's selection for a "preliminary award" does not mean that the Respondent is guaranteed a contract with Consumers Energy. Furthermore, Consumers Energy's commencement of, and participation in, due diligence reviews and contract negotiations shall not be construed as a commitment to execute a contract with a Respondent. Only execution of a definitive agreement by both Consumers Energy and the Respondent on mutually acceptable terms will constitute a "winning proposal". Additionally, Respondents not selected for preliminary awards were reminded that they must hold proposal terms, and pricing, valid until June 30, 2021 in the event Consumers Energy elects to pursue alternate proposals.

Enel X affirms that throughout the Selection Phase, no detail was provided or shared with Consumers Energy containing any Respondent-identifying information that could create any selection bias.



Independent Administrator Conclusions

Analysis of RFP Process

From the onset of the Consumers Energy RFP process, sharp focus was placed on ensuring the fairness and transparency of the RFP process – across all of its primary phases. Enel X was involved in all primary facets of the RFP process from the Preparation Phase onward and concludes that each primary facet of the RFP process was conducted and managed professionally, fairly, and without bias.

During the Preparation Phase, great efforts were made to engage RFP stakeholders and ensure that stakeholder feedback, comments, questions, and concerns were addressed as much as able.

During the Solicitation Phase, a very wide net, via public advertisement and email notices, was cast to ensure a broad market canvassing of the RFP and open-access to all RFP materials by all parties. Across a number of participation prerequisites, all Respondents were held to a uniform standard and provided support to ensure that they could meet such standards. Through the proposal submittal process, all Respondents submitted proposals through the same, central, location on the Enel X Solicitation Platform.

During the Evaluation Phase, Respondents were contacted to clarify proposal attributes and all Respondent proposals were evaluated and scored utilizing the same tools, which had been made available to all parties during the RFP process so that they could see exactly how their proposals would be assessed. During the development of blind Evaluation Results files, Consumers Energy was restricted from accessing any Respondent or project identifying data to ensure that selections could be made in a completely blind environment with no Respondent bias.

During the Selection Phase, Consumers Energy followed a formal process to convey its blind selections prior to receipt of details regarding selected proposals from Enel X. Enel X notified all Respondents of their preliminary award statuses in a uniform fashion while providing clear detail and guidance regarding the nature of preliminary awards.

Throughout the RFP process, Consumers Energy was effectively limited in its involvement and Enel X, as the Independent Administrator, was able to manage the RFP process without undue influence.

Attestations

Enel X attests that the following conditions were satisfied:

- The solicitation process was fair;
- The screening factors and weights were applied consistently and comparably to all bids;
- All reasonably available data and information necessary in order for a potential bidder to submit a bid was provided;
- The IA was provided with or given access to all data, information and models relevant to the solicitation process in order to permit full and timely scoring, testing and verification of assumptions, models, inputs, outputs, and results;



- The confidentiality claims and concerns between the IA and the Owner were resolved in a manner that preserved confidentiality as necessary, yet permitted dissemination and consideration of all information reasonably necessary for the bidding process to be conducted fairly and thoroughly; and
- Evaluations were performed consistent with criteria and methods stated under the solicitation protocol document.

Conflict of Interest Declarations

Enel X contends that there were not real conflicts of interest present with the solicitation Respondents. Consumers Energy and Enel X did, however, receive concerns from a Respondent regarding the Respondent's perceived conflict of interest in having Enel X serve as the Independent Administrator given the presence of other Enel Group entities within the renewable energy development community.

Enel X affirmed to all Respondents that it is a distinct and independent operating company from Enel Green Power (a renewable energy developer). Further, Enel X stated that it does not have a renewable energy development arm or ability/intent to participate within the Consumers Energy RFP process. While both separate Enel entities share part of a common name and holding company, there are no overlapping components between each entity and absolutely no preferential treatment(s), reciprocal or otherwise, given between Enel X and Enel Green Power.

Enel X, as the Independent Administrator, does not, did not, and will not share the sensitive information provided by Respondents with affiliates of Enel or other Enel Group companies. Further, Enel X has conducted and managed all facets of the Consumers Energy RFP process with the utmost transparency while ensuring that all Respondents are treated fairly, equitably, and without bias (real or perceived).

Enel X takes both our partners' and Respondents' confidentiality and the establishment of a level playing field for all Respondents seriously and has detailed protocols to ensure that all confidential information remains confidential and that all administered RFPs afford equal opportunity to every Respondent.

Enel X employees must observe an obligation of confidentiality and neutrality while performing Independent Administrator services, and may not disclose confidential information outside of Enel X (including employees of other companies of the Enel Group, respondents, other customers, etc.) or provide preferential treatment to any respondent. For this purpose, Enel X has established:

- Physical separation of databases belonging to different companies within the Enel group;
- Regulation of access to the Enel X Solicitation Website; and
- Signature of a specific confidentiality and neutrality declaration by each Enel X employee providing these services in order to define a general duty of confidentiality and neutrality in the performance of their activities.

To further enforce such positions, Enel X also offered all Respondents the opportunity to establish a non-disclosure agreements ("NDAs"). Ultimately, only one Respondent established an NDA with Enel X to alleviate



perceived concerns and no Respondents declined to participate due to any noted conflict of interest (be it with Enel X or other perceived Respondents).

Recommended RFP Process Improvements

Enel X recommends that Consumers Energy considers the following potential RFP and Solar Solicitation improvements and enhancements:

1. Modify title of each Respondent form/document package to reference the Appendix letter associated (as stated within the RFP document).
2. Add additional definitions to various topics within the RFP document, including the following:
 - a. Capacity Credit Factor
 - b. Capacity Value
 - c. Proposals including Escalators
 - d. Change in project ownership prior to proposal submission, specifically if it remains under the same parent company (in terms of implication to previous granted qualification status)
3. Remove in-line key dates and RFP schedule from the RFP document and only host a complete schedule centrally on the Solicitation Website. Due to RFP schedule changes, the dates listed within the original RFP document and associated forms were not always accurate, which led to some Respondent confusion.
4. Shift forms to Excel format to enable IA to more efficiently combine Appendices.
5. Update BTA Economic Model to remove input fields for end of project life assumptions for new solar resources and create dynamic toggle for resource type ("new" or "existing") with selection of "existing" creating end of life fields.
6. Establish locked, forced-response, proposal documents. Enel X recommends that proposal documents be revised and that select fields within proposal documents contain logic that would require Respondents to enter certain values in order to complete. Host any proposal documents requiring signature/execution on DocuSign (or equivalent) platform to ensure agreements are executed with no changes.
7. Consider limited Respondent indemnification within Binding Bid Agreement to value of posted pre-bid security (currently uncapped).
8. Consider modifying pre-bid security return language for parties having executed agreements with Consumers Energy to have pre-bid security withheld through to the provision of contract security.
9. Revisit contract templates and determine whether or not additional procedural steps could be established to enforce use of final contract templates.
10. Afford additional time to the Independent Administrator to conduct final proposal screenings following the tendering of final proposals.



Pre-existing recommendations stemming from the 2019 Solar Solicitation:

1. Establishment of a formal process for managing award selections when top ranked proposals are for fractional quantities of sought totals. In the event a top ranked proposal is not for the full quantity solicited by Consumers Energy, Enel X recommends that a process be developed that would afford Consumers Energy with greater flexibility to select proposals that would afford desired quantities.
2. Determine whether or not a standard process for which macro-level aggregate proposal details may be shared with Respondents should be established. Following the conveyance of preliminary awards, many Respondents have requested insight into the level of response seen within the RFP, detail regarding the rank of their proposals, and information relative to the range of pricing seen across BTA proposals submitted.
3. Continue to evaluate ways in which Evaluation Models may be modified with additional fixed/default calculation/ranking mechanisms. Given the bespoke nature of long term renewable contracts, both PPAs and BTAs, Enel X recommends that the Consumers Energy Evaluation Models be revised to further limit the amount of Respondent-provided costs, particularly those that are ultimately accounted for outside of proposal prices that are captured within the models.

Virtual MPSC Staff Audit

On September 1, 2021, Enel X and Consumers Energy hosted a virtual MPSC Staff audit within two distinct Microsoft Teams virtual meeting rooms, one meeting room managed and hosted by Consumers Energy and a separate meeting room managed and hosted by Enel X. The purpose of the audit was to provide MPSC Staff with full visibility into all facets of the RFP, allow MPSC staff to conduct an independent review of RFP processes, the competitive bidding dynamic, proposal rankings, and selections/results while making both the Enel X and Consumers Energy RFP teams accessible for any questions. All supporting audit materials, including confidential materials, were only accessible by MPSC Staff within a private Enel X SharePoint site within which materials were not available for download or exportation.

The virtual audit followed the following Run of Show on September 1, 2021:

- **9:00 AM EPT - 9:30 AM EPT** - Consumers Energy, Enel X, and MPSC Staff Convened in Consumers Energy Microsoft Teams Room, Consumers Energy and Enel X Presented Overview of 2020 Solar Solicitation
- **9:30 AM EPT - 12:00 PM EPT** - Enel X and MPSC Convened in Enel X Virtual Audit Microsoft Teams Room, MPSC Staff Conducted Review of 2020 Solar Solicitation
- **12:00 PM - 1:00 PM EPT** - Session Break
- **1:00 PM - 1:30 PM EPT** - Consumers Energy, Enel X, and MPSC Staff Convened in Consumers Energy Microsoft Teams Room, MPSC Staff Addressed Open Questions for Consumers Energy
- **1:30 PM EPT - 2:45 PM EPT** - Enel X and MPSC Convened in Enel X Virtual Audit Microsoft Teams Room, MPSC Staff Continued Review of 2020 Solar Solicitation
- **2:30 PM EPT - 3:10 PM EPT** - Consumers Energy, Enel X, and MPSC Staff Convened in Consumers Energy Microsoft Teams Room, MPSC Staff Addressed Additional Questions for Consumers Energy and Consumers Energy Reviewed Closing Remarks, Detailed Next-Steps



The audit session began at 9:00 AM EPT on September 1, 2021 within the Consumers Energy hosted Microsoft Teams meeting room with Consumers Energy, Enel X, and MPSC Staff present. Consumers Energy and Enel X provided MPSC Staff with an overview of its RFP and supporting processes, a summary of proposals and capacities submitted, and a summary of near term milestones relating to the current RFP and future IRP solicitations.

At 9:30 AM EPT, the audit session transitioned from the Consumers Energy hosted Microsoft Teams meeting room to the Enel X hosted virtual audit Microsoft Teams meeting room with only Enel X and MPSC Staff present. Once in its virtual audit Microsoft Teams meeting room, Enel X provided all members of MPSC Staff in attendance with access permissions to a private online SharePoint file directory containing all RFP materials and process documents.

Within its private online SharePoint file directory, Enel X made available to MPSC Staff electronic copies of all RFP materials, process documents, response summaries, proposal submissions, proposal evaluations, proposal scoresheets/rankings, and its IA Report. Only Restricted Access permissions were provided to MPSC Staff within the online SharePoint file directory, which only allowed for the viewing of materials within SharePoint and did not allow for the download or printing of any hosted materials.

Enel X answered any MPSC Staff questions related to RFP processes and procedures and provided guidance on the materials it made available in support of the audit. In the event questions arose regarding Consumers Energy-developed RFP templates, models, or methodologies, Enel X cataloged these questions and tabled them for addressing upon return to the Consumers Energy hosted Microsoft Teams room.

At 12:00 PM EPT, the virtual audit session entered a one hour recess and at 1:00 PM EPT, Consumers Energy, Enel X, and MPSC Staff reconvened within the Consumers Energy hosted Microsoft Teams room. Upon reconvening, questions raised earlier by MPSC staff that required guidance and/or input from the Consumers Energy team were addressed. Following a brief discussion within the Consumers Energy Microsoft Teams meeting room, Enel X and MPSC Staff regrouped within the Enel X hosted virtual audit Microsoft Teams meeting room.

From approximately 1:30 PM EPT to approximately 2:45 PM EPT MPSC Staff continued its review of RFP materials with Enel X. At approximately 2:45 PM EPT, Consumers Energy, Enel X, and MPSC Staff reconvened within the Consumers Energy hosted Microsoft Teams room. Consumers Energy addressed remaining questions held by MPSC Staff, provided closing remarks regarding the next-steps within the RFP process, and then adjourned the audit session. Enel X then disabled all access permissions to its private online SharePoint file directory. The virtual audit itself ran from approximately 9:00 AM EPT to approximately 3:10 PM EPT on September 1, 2021.

Enel X affirms that during the MPSC Staff Audit no materials were provided to or shared with Consumers Energy containing any Respondent-identifying information. Further, Enel X affirms that no sensitive RFP materials or proposal documents were ever removed from the private online SharePoint file directory by parties in attendance.