

December 15, 2023

Electronically Submitted via MiEnviro

Michigan Department of Environment, Great Lakes, and Energy
Water Resources Division, Bonnie Broadwater
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503-2316

**RE: NOTICE OF PLANNED PARTICIPATION ANNUAL PROGRESS REPORT PURSUANT TO 40 CFR 423.19(f)(3)
CONSUMERS ENERGY COMPANY, JH CAMPBELL COMPLEX NPDES PERMIT NO. MI0001422,
STEAM ELECTRIC EFFLUENT LIMITATION GUIDELINES**


Dear Ms. Broadwater,

Consumers Energy Company (Consumers) submitted a Notice of Planned Participation (NOPP) for the JH Campbell (Campbell) Complex, NPDES Permit No. MI0001422 on October 11th, 2021, seeking to qualify as an electric generating unit that will achieve permanent cessation of coal combustion by December 31st, 2028. According to 40 CFR 423.19 (f)(3) annual progress reports shall be submitted detailing the progress made to achieve the cessation of coal use. Consumers is submitting the following information to support the requirements for Campbell Units 1, 2, & 3 that will achieve permanent cessation of coal combustion by December 31st, 2028.

Pursuant to 40 CFR 423.19 (f)(4), an annual progress report shall detail the completion of any interim milestones listed in the NOPP since the previous progress report, provide a narrative discussion of any completed, missed, or delayed milestones, and provide updated milestones. An updated timeline, to reflect the requirements of 40 CFR 423.19(f)(4), is included in Attachment A.

If you have any questions or need additional information, please do not hesitate to contact me at (517) 788-1429 or by email at Rachel.proctor@cmsenergy.com.

Sincerely,



Rachel Proctor, P.E.
Consumers Energy – Environmental Quality and Sustainability
Principal Environmental Engineer



Electronically Distributed

CC: Ms. Kristin Melcher, Consumers Energy Company, Campbell

Attachment A

Permanent Cessation Timeline Update

ACTIVITY – INTERIM MILESTONE	PROJECTED DATE OF COMPLETION	STATUS	NOTES
NOPP Submittal	10/13/2021	COMPLETE	
Expected Integrated Resource Plan (IRP) Approval by the MPSC	6/27/2022	COMPLETE	12/16/2022: The IRP was approved on June 23, 2022. A copy of the most recent integrated resource plan for which the applicable state agency approved the retirement of the unit subject to the Effluent Limitation Guidelines (ELGs), pursuant to 40 CFR 423.19(f)(2), was included as Attachment B in the 2022 Annual Progress Report.
Expected MISO Study Results	3/11/2022	COMPLETE	12/15/2023: MISO approved the suspension of Campbell Units 1, 2, & 3 effective June 1, 2025, on March 11, 2022
Cold & Dark¹ Outage Specifications Finalized	4/22/2024 7/18/2024	ON SCHEDULE	12/16/2022: Cold and Dark outage specifications are delayed; however, the delay in these final specifications will not impact Campbell Units 1, 2, and 3 retirement schedule, which are still expected to retire in 2025 consistent with the NOPP. The delay is due to the difference between the initial conceptual schedule and the refined project schedule.

ACTIVITY – INTERIM MILESTONE	PROJECTED DATE OF COMPLETION	STATUS	NOTES
Cold & Dark Contract Award	1/26/2025 12/19/2024	ON SCHEDULE	12/16/2022: Change in date is due to the difference between the initial conceptual schedule and the refined project schedule.
MPSC² and MISO³ approved Unit 1, 2, & 3 Retirement; Cold & Dark Outage Start	5/31/2025	ON SCHEDULE	10/11/2021: JH Campbell Units 1, 2, and 3 will no longer generate electricity
Cold & Dark Outage Complete	9/6/2025 8/31/2025 10/31/2025	ON SCHEDULE	12/14/2023: The change in date will not impact Campbell Units 1, 2, and 3 retirement schedule. 10/11/2021: JH Campbell Units 1, 2, and 3 will be deenergized and ready for AD&D. The change in date is due to the difference between the initial conceptual schedule and the refined project schedule.

Notes:

- (1) “Cold & Dark” refers to a period of time where preparations are put in place for Abatement, Decommissioning & Demolition (AD&D).
- (2) MPSC is the Michigan Public Service Commission
- (3) MISO is the Midcontinent Independent System Operator