

October 6, 2022

Electronically Submitted via MiWaters

Michigan Department of Environment, Great Lakes, and Energy
Water Resources Division, Ms. Jill Edelbrock
401 Ketchum Street, Suite B
Bay City, MI 48708-5430

**RE: NOTICE OF PLANNED PARTICIPATION ANNUAL PROGRESS REPORT PURSUANT TO 40 CFR 423.19(f)(3)
CONSUMERS ENERGY COMPANY, DE KARN COMPLEX NPDES PERMIT NO. MI0001678,
STEAM ELECTRIC EFFLUENT LIMITATION GUIDELINES**

Dear Ms. Edelbrock,

Consumers Energy Company (Consumers) Submitted a Notice of Planned Participation (NOPP) for the DE Karn (Karn) Complex, NPDES Permit No. MI0001678 on October 11, 2021, seeking to qualify as an electric generating unit that will achieve permanent cessation of coal combustion by December 31, 2028. According to 40 CFR 423.19(f)(3) Annual Progress Reports shall be submitted detailing the progress made to achieve cessation of coal. Consumers is submitting the following information to support the requirements for Karn Units 1 and 2 at the DE Karn Complex that will achieve permanent cessation of coal combustion by December 31, 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 & Sustainability
Senior Engineer



Electronically Distributed

CC: Mr. George Eurich, Consumers Energy Company, Karn

Attachment A

Permanent Cessation Timeline Update

ACTIVITY – INTERIM MILESTONE	PROJECTED DATE OF COMPLETION	STATUS	NOTES
NOPP Submittal	10/13/2021	COMPLETE	
Cold & Dark¹ Outage Specifications Finalized	11/30/2022 4/22/2022	DELAYED - IN PROGRESS	10/13/2022: Cold and Dark outage specifications were delayed in being finalized due to Consumers’ Integrated Resource Planning (IRP) Case No. U-21090, regarding the closure of Karn Units 3 and 4, which burn oil and natural gas. The IRP submitted to the MPSC on June 30, 2021, proposed the closure of all Karn Units 1, 2, 3, and 4. On June 23, 2022, a final settlement was approved where Karn Units 3 and 4 were expected to remain in operation through 2030 and as such, specifications needed to be revised to reflect this change. The delay in these final specifications will not impact Karn Units 1 and 2 retirement schedule, which are still expected to retire in 2023 consistent with the NOPP.
Cold & Dark Contract Award	1/26/2023	ON SCHEDULE	
MPSC² and MISO³ approved Unit 1 & 2 Retirement; Cold & Dark Outage Start	5/31/2023	ON SCHEDULE	10/11/2021: Karn Units 1 and 2 will no longer operate
Cold & Dark Outage Complete	8/31/2023	ON SCHEDULE	10/11/2021: Karn Units 1 and 2 will be deenergized and ready for AD&D

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