

October 13, 2023

Electronically Submitted via MiEnviro

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 FINAL 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 (EGU) 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.

As of May 31, 2023, Karn Units 1 and 2 permanently ceased operation as EGUs and as of June 30, 2023, all condenser cooling water pumps, for Karn Units 1 and 2, were permanently shut down. Continued work is being conducted for Karn Units 1 and 2 decommissioning; however, the Units no longer operate, and the site no longer generates bottom ash transport water. Therefore, Consumers is submitting this as the final progress report. 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](mailto:rachel.proctor@cmsenergy.com).

Sincerely,



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

Electronically Distributed

CC: Ms. Tashia Walraven, Consumers Energy Company, Karn

# Attachment A

## Permanent Cessation Timeline Update

ACTIVITY – INTERIM MILESTONE	PROJECTED DATE OF COMPLETION	STATUS	NOTES
<b>NOPP Submittal</b>	10/13/2021	COMPLETE	
<b>Cold &amp; Dark<sup>1</sup> Outage Specifications Finalized</b>	11/30/2022 <del>4/22/2022</del>	COMPLETE	
<b>Cold &amp; Dark Contract Award</b>	1/26/2023	COMPLETE	
<b>MPSC<sup>2</sup> and MISO<sup>3</sup> approved Unit 1 &amp; 2 Retirement; Cold &amp; Dark Outage Start</b>	5/31/2023	COMPLETE	10/13/2023: Karn Units 1 and 2 are no longer operational and condenser cooling water pumps have been permanently shut down as of June 30, 2023. All bottom ash transport water generation has ceased.
<b>Cold &amp; Dark Outage Complete</b>	12/31/2023 <del>8/31/2023</del>	DELAYED - IN PROGRESS	10/13/2023: Cold & Dark outage has been delayed; however, this delay does not impact retirement of Karn Units 1 & 2 as both units have ceased operation and no longer generate bottom ash transport water.

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