

October 24, 2017

Kimberly D. Bose, Secretary
Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
Dockets Room, Room 1A
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**FERC PROJECT NO. 2680-113
LUDINGTON PUMPED STORAGE HYDROELECTRIC PROJECT
RESPONSES TO JULY 27, 2017 STAFF COMMENTS ON THE FINAL LICENSE APPLICATION UNDER
EXTENSION REQUEST**

Dear Ms. Bose,

On June 28, 2017 Consumers Energy Company (“Consumers Energy”) and DTE Electric Company (“DTEE”) (collectively, “Licensees”) co-Licensees of the Ludington Pumped Storage Hydroelectric (FERC Project No. P-2680), filed an Application for new license. By letter dated July 27, 2017, FERC Staff (“Staff”) provided a deficiency and Additional Information Request (“AIR”): (1) Schedule A - Application deficiencies and (2) Schedule B - request for additional information for the Application for new license for the Ludington Pump Storage Project (“Project”). Responses to Staff’s request were filed on September 25, 2017. The Licensees requested a 30-day extension for Schedule B items numbers 9, 18, and 19 (i.e., by October 25, 2017), which was granted by FERC Staff in an October 3, 2017 letter. The initial responses to these three Schedule B items indicated that some information provided in Exhibits D and E (and subsequently Exhibit H as well) needed to be revised. The extension permitted the Licensees to provide the revisions without undue delay.

During the preparation of the September 25, 2017 responses, the Licensees determined that several values discussed in Exhibits D, E and H of the Application were not correctly defined based on the co-ownership of the Project. Values for the estimated average cost of the Project, property taxes, Project revenue, cost of pumping, and production cost provided in the Application were presented on a total project basis. However, it was determined that the values provided were Consumers’ specific and equivalent values for DTEE were not included. Based on the new information changes were identified for Exhibits D, E and H of the application. Enclosure 1 contains revisions to select portions of Exhibits D, E and H.

Additionally, in the September 25, 2017 response for Schedule B Item 19, a change was identified to Table E-4.3.3-9 to change the total annual cost of the seasonal barrier net.

However, a revised table was not provided with the response. Table E-4.3.3-9 was taken from the 2016 Phase 3 Fisheries Studies Report by Alden Labs. Alden developed an estimate for the total annual barrier net costs of \$2,817,000 and used this value in their evaluation of the different engineered alternatives. When preparing the Final License Application, Consumers changed the annual cost to reflect the 2016 actual cost determined in Exhibit D Table D-4.6-2. When reviewing the changes for Schedule B Item 19 the licensees determined that the values used in Table E-4.3.3-9 should not have been changed from the values originally provided by Alden. The table is to be used within the context of the Phase 3 study results and as such the values should represent those determined by Alden. [Note: in Schedule B Item 13 Staff requested the Licensees to revise Table E-4.3.3-8 from 2015\$ to 2016\$. This revision was provided in the September 25, 2017 response. Table E-4.3.3-8 was taken from the Alden Phase 2 Fisheries Study Report. Since the requested change was made to all values in the table, consistency with the Phase 2 results was maintained, unlike changing a single value from Table E-4.3.3-9.] Enclosure 2 contains a revision to Exhibit E Table E-4.3.3-9, changing the barrier net annual cost from the \$3.2 million value used in the Final License Application to the original, Alden value of \$2.817 million. Footnote 5 to the table has been deleted.

Questions regarding the Licensees' responses should be directed to David McIntosh of my staff at (231) 779-5506.

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Enclosure 1

Revised Sections of License Application Exhibits D, E and H

EXHIBIT D Changes

4.0 ESTIMATED AVERAGE ANNUAL COST OF THE PROJECT

This section describes the annual costs of the Project as proposed. The estimated average cost of the total Project will be approximately ~~\$26,912,918~~ ~~\$20,715,617~~ per year, based on an 8-year period¹ of analysis. This estimate includes the direct plant costs associated with existing and projected project operations and maintenance, ongoing costs of installing, maintaining, repairing and storing the seasonal barrier net and local property and real estate taxes. Income taxes, depreciation, and costs of financing are excluded from this estimate. **Table D-4.0-1 provides the annual costs for the 8-year average.**

4.2 Taxes

Property taxes for 2016 **were \$15,625,283, representing the combined tax payments for Consumers and DTEE. ~~are expected to be approximately \$7,945,529.~~** Property taxes in Michigan are paid directly to the local community(s) hosting the Project. For the Ludington Project, these property taxes are paid to Mason County, **distribution to Pere Marquette and Summit Townships is in accordance with the respective millage rate for each township and PMCT.** Income taxes for the Project are incorporated into costs of the Licensee's consolidated business and are not separated out for the Project.

4.4 Operation and Maintenance Expenses

There are two components to the project Operations and Maintenance (O & M) costs. First there are the direct costs associated with project operations and maintenance activities. These are costs incurred by Consumers as the majority owner and operator of the project (i.e. plant staff, office supplies, testing, etc.). Second, separated out from these costs are those associated with the barrier fish net (installation, retrieval, cleaning, repair, monitoring and storage). These direct costs are divided according to the ownership percentages of each licensee (51% for Consumers and 49% for DTEE). Table D-4.0-1 provides a summary of these O & M costs for the last 8-years (2009 through 2016).

The estimated 2017 ~~annual~~ direct operation and maintenance expense for the Project will be approximately \$18,500,000. **This estimate includes the expected cost for barrier net maintenance and monitoring, property taxes are not included. The electrical energy costs for pumping ~~costs~~ are separated from the direct O & M costs and reflect MISO rates for energy used at the time pumping occurs. For 2016, the Consumers ~~the~~ average cost of pumping was \$22.01/MWH while the DTEE cost of pumping was \$22.39/MWH (based on day ahead and real time pumping costs, and weighted by the amount of pumping).**

The cost for pumping is specific for each licensee and depends on how each licensee dispatches the units as pumps based on the licensee's generation, the MISO electrical rates at the time pumping occurs and on how the electrical energy cost is treated with each licensee's Power Supply Cost Recovery (PSCR) factor, which is determined through the Michigan Public Service Commission (MPSC). The PSCR portion

¹ An 8-year average was selected because of a computer software upgrade that occurred in 2009. Data prior to the upgrade is difficult to retrieve and was not pursued.

of a utility's electrical rate is a variable component and can be adjusted on a monthly basis as actual power supply costs fluctuate. The power supply costs are reviewed for prudence and reconciled to corresponding PSCR revenues on an annual basis. Any under or over recovery of PSCR revenues are charged or refunded to the customer through an increase or decrease in a subsequent month's PSCR factor. The PSCR is reconciled at the corporate level and not at the project level thus the effect on project pumping costs cannot be estimated.

5.0 ESTIMATED ANNUAL VALUE OF PROJECT POWER

Power generated by the project is sold through Midcontinent Independent System Operator (MISO), and power used to pump water off peak is also purchased from MISO at prevailing market rates (the cost for electric power for pumping is also subject to each licensee's PSCR factor as discussed in Exhibit D Section 4.4). The value of the project power is licensee specific depending upon how and when each licensee dispatches the units and the hours of generation by each licensee. The Licensees estimate total annual energy production of about 2,658,200² megawatt-hours, which will be sold at the prevailing market rates. The average market clearing price for energy can be estimated based on the MISO website.

For In 2016, the value of the Project power for Consumers was \$42.48/MWH and \$38.34/MWH for DTEE, based on actual generation and MISO market rates.

² The energy generation is calculated for the Project using upgraded unit capacity of 297.5 MW and using the current capacity factor (17%).

Table D-4.0-1: Annual Breakdown of Average Costs³

	2009	2010	2011	2012	2013	2014	2015	2016	Total	8 Year Average
	(millions)									
Direct Plant dollars	\$11.25	\$12.23	\$10.83	\$11.23	\$12.79	\$12.50	\$13.33	\$11.53	\$95.69	\$11.96
Net Maintenance & Effectiveness	\$1.92	\$2.16	\$2.17	\$2.24	\$2.43	\$2.26	\$2.40	\$3.04	\$18.62	\$2.33
Property Taxes										
Consumers Energy	\$5.87	\$5.86	\$5.97	\$6.10	\$6.20	\$6.52	\$6.93	\$7.95	\$51.40	\$6.43
DTEE	\$5.66	\$5.69	\$5.76	\$5.87	\$5.97	\$6.28	\$6.71	\$7.68	\$49.58	\$6.20
Total	\$24.70	\$25.89	\$24.73	\$25.45	\$27.39	\$27.56	\$29.38	\$30.19	\$215.3	\$26.92

³ This table was included in the September 25, 2017 response to the July 27, 2017 FERC Staff questions regarding the Final License Application.

Exhibit E

5.1 Power and Economic Benefits of the Project

The Project has six 297.5 MW generating units operating in a pump storage facility with an installed capacity of 1,785 MW and a total estimated hydraulic capacity of 76,290 cfs during generation and 84,000 cfs during pumping.

In order to estimate the economic benefit of the project, the differences in how each licensee utilizes the project needs to be taken into consideration. As discussed in Exhibit D Section 4.0 each licensee has specific values for their respective project revenues and costs of pumping. Additionally, the production costs are discussed in Exhibit H Section 2.3.1. Table E-5.1-1 summarizes these values.

Table E-5.1-1: Estimated Economic Factors

Licensee	Ownership	Revenue \$/MWH	Pumping Cost \$/MWH	Production Cost \$/MWH
Consumers	51%	42.48	22.01	22.16
DTEE	49%	38.34	22.39	22.39
Weighted Average		40.45	22.20	22.27

5.1.1 Current Annual Value of Developmental Resources Associated with the Project

The Project receives operating revenues from power sales to wholesale customers, market-based power sales, and the provision of ancillary services to the MISO electricity market.

The Project revenue based on for 2016 using the weighted average energy values of is ~~\$40.45~~~~42.48~~/MWH and the long term average energy generation of 2,357,000 MWH (Exhibit H, Section 2.3.1 and Exhibit B, Table B-1.4-1.) is ~~or~~ estimated to be ~~\$95,343,950~~~~100,125,360~~.

Therefore, under the No-Action Alternative, the Project is expected to generate approximately ~~\$95.3~~~~100.1~~ million annually.

5.1.2 Current Annual Cost of Operations, Maintenance, and Administration

The weighted average production cost of ~~\$22.27~~~~22.16~~/MWH (based on 2016 costs), or ~~\$52,490,390~~~~52,231,120~~ using a long term average energy generation of 2,357,000 MWH. (Exhibit H, Section 2.3.1 and Exhibit B, Table B-1.4-1.) This includes the 2016 operations and maintenance costs, property taxes, and annual cost of capital and depreciation. The weighted average pPumping cost is ~~\$22.20~~~~22.01~~/MWH (based on day ahead and real time costs), or ~~\$72,349,800~~~~71,730,590~~ using a long-term average pumping energy requirement of 3,259,000 MWH. (Exhibit B, Table B-1.4-1)

Therefore, under the No-Action Alternative, the Project is expected to have operational costs of approximately ~~\$52.5~~~~52.2~~ million annually. This does not include the cost for pumping. As discussed in

Exhibit D Section 4.4, the cost for electric power for pumping is subject to each licensee's Power Supply Cost Recover factor and is reconciled on a corporate basis and not at the project level, thus the effect on the cost of pumping has not been estimated.

5.2.2 Proposed Action

Under the Proposed Action the average annual value of Project power is expected to ~~remain the same as the No Action Alternative,~~ be valued at \$107,524,190~~112,920.336~~⁴ using the weighted average energy value of \$40.45/MWH and the long term average energy generation of 2,658,200 MWH (Exhibit D, Section 5.0).

⁴ Note this is the value provided in the licensee's September 25, 2017 response to the July 27, 2017 FERC Staff questions regarding the Final License Application. The value in the Final License Application was \$100.1 million.

Exhibit H

2.2 Need for the Electricity Generated by the Project

2.2.1 The Reasonable Costs and Availability of Alternative Sources of Power

The electricity the Project generates is generally used to meet daily peak electrical demand. The electrical output from the Project is sold wholesale into the MISO administered wholesale market.

The Project's authorized capacity under a new license is 1,785 MW. At the time of filing, three of the six upgrades were completed and the Project has an authorized capacity of 1,700 MW. In 2016, the Project's **weighted average** production cost was approximately **\$22.27** per MWH (**Exhibit E Section 5.1**).

In 2016, the Licensees' peak load, marginal annual production costs and marginal capacity costs are in Table H-2.2.1-1.

2.3 Need, Reasonable Cost, and Availability of Alternative Sources of Power

The Licensees are electric utilities and have an obligation to serve load and provide capacity in their electric service territories.

2.3.1 Average Annual Cost of Project Power

From **Exhibit E Section 5.1** the **weighted** average cost of producing electricity at the Project is **\$22.27** dollars per megawatt-hour (\$/MWH). Production costs are expected to change annually by the change in the Consumer Price Index (CPI). This estimate is based on historical routine Operating and Maintenance (O&M) expenses, including Commission fees, property taxes, labor costs and routine/repetitive non-labor costs. It also includes an estimate of annual depreciation expenses, non-routine construction and maintenance and license initiatives. The estimate assumes annual generation of approximately 2,357,066 MWH, which is the average annual generation produced by the Project between October 1999 and September 2016.

Enclosure 2

Revised Table E-4.3.3-9
Cost Comparison of Evaluated Engineering Alternatives

Table E-4.3.3-9: Cost Comparison of Evaluated Engineering Alternatives

Alternative	Initial Capital Costs			Annual O&M Costs				
	Total Project Construction Costs (2016 \$)	Replacement Power During Construction (2016 \$) ¹	Total Capital Costs (2016 \$)	Energy (2016 \$) ^{1,2}	Labor (2016 \$) ²	Component Replacement (2016 \$) ^{2,3}	Total Annual Costs (2016 \$) ^{2,4,5}	Incremental Annual O&M Costs (2016 \$)
Existing Barrier Net	NA	NA	NA	\$440,000	\$2,053,000	\$324,000	\$2,817,000 3,200,000	\$0
Alt 13B	\$4,021,565,000	\$217,800,000	\$4,239,365,000	\$1,221,000	\$22,000	\$0	\$1,243,000	-\$1,574,000
Alt 13C	\$827,310,000	\$99,000,000	\$926,310,000	\$863,500	\$60,000	\$0	\$923,500	-\$1,893,500
Alt 13D	\$1,792,855,000	\$178,200,000	\$1,971,055,000	\$1,457,500	\$65,000	\$0	\$1,522,500	-\$1,294,500
Alt 20A	\$64,400,000	\$19,800,000	\$84,200,000	\$781,000	\$2,053,000	\$324,000	\$3,158,000	\$341,000
Alt 20B	\$33,061,000	\$13,200,000	\$46,261,000	\$440,000	\$2,053,000	\$324,000	\$2,817,000	\$0
Alt 13B + Acoustic Barrier	\$4,024,691,000	\$225,017,000	\$4,249,708,000	\$1,223,000	\$82,000	\$74,000	\$1,379,000	-\$1,438,000
Alt 13C + Acoustic Barrier	\$832,898,000	\$113,222,000	\$946,120,000	\$867,500	\$185,000	\$135,000	\$1,187,500	-\$1,629,500
Alt 13D + Acoustic Barrier	\$1,795,371,000	\$185,417,000	\$1,980,788,000	\$1,459,500	\$190,000	\$60,000	\$1,709,500	-\$1,107,500

1. Assumes 1,000 Mwh per day per Unit and a cost of \$55 per MWh.
2. Includes existing O&M effort required to maintain the barrier nets when applicable
3. For the existing barrier net, net replacement is considered a capital cost by the owners.
4. Does not include annual fisheries compensation costs.
5. Existing barrier net costs have been updated based on data from 2016 and includes installation/removal, cleaning, maintenance, effectiveness monitoring, and component replacement. Details are provided in Exhibit D.

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Michigan United Conservation Clubs
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National Wildlife Federation
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Township Clerk
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7161 72nd Avenue
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Charter Township of Pere Marquette
Zoning Administrator Terry Wahr
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Ludington, MI 49431

Charter Township of Pere Marquette
Township Supervisor Paul Keson
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Charter Township of Pere Marquette
Township Clerk Rachelle Enbody
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City of Grand Haven
Clerk Linda Schmidt
519 Washington Avenue
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City of Holland
Deputy Clerk Anna Perales
270 South River Avenue
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City of Ludington
City Clerk Deborah Lusk
400 S. Harrison
Ludington, MI 49431

City of Zeeland
Clerk Karen Jipping
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Laketown Township
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Marquette County Board of Commissioners
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Mason County Drain Commissioner
David Hasenbank
102 East Fifth St.
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Mason County Parks and Recreation
Chairman David McClean
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Ludington, MI 49431

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Ottawa County
County Clerk Daniel Krueger
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Park Township
Township Clerk Skip Keeter
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Township Clerk
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Summit Township
Township Clerk Mary Anthony Samuels
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U.S. Coast Guard
C/O Cg Group
MSO Sault Ste. Marie
Sault Ste. Marie, MI 49783-9501

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