

A CMS Energy Company

July 20, 2018

Via U.S. and Electronic Mail

Tracy Jane Andrews, Esq. Olson, Bzdok & Howard, P.C. 420 East Front Street Traverse City, MI 49686

General Offices: One Energy Plaza Jackson, MI 49201

Tel: (517) 788-0550 Fax: (517) 768-3644

*Washington Office:

1730 Rhode Island Ave. N.W. Tel: (202) 778-3340 Suite 1007 Washington, DC 20036 Fax: (202) 778-3355

Writer's Direct Dial Number: (517) 788-2112 Writer's E-mail Address: anne.uitvlugt@cmsenergy.com CATHERINE M REYNOLDS Senior Vice President and General Counsel

MELISSA M GLEESPEN Vice President, Corporate Secretary and Chief Compliance Officer

SHAUN M JOHNSON Vice President and Deputy General Counsel

Bret A Totoraitis Kelly M Hall Eric V Luoma Assistant General Counsel

Ashley L Bancroft Robert W Beach Don A D'Amato Robert A. Farr Gary A Gensch, Jr. Gary L Kelterborn Chantez P Knowles Mary Jo Lawrie Rhonda M Morris Deborah A Moss* Mirče Michael Nestor Michael C. Rampe James D W Roush Scott J Sinkwitts Adam C Smith Theresa A G Staley Janae M Thaver Anne M Uitvlugt Aaron L Vorce Attorney

RE: MPSC Case No. U-20134 – In the Matter of the application of Consumers Energy Company for Authority to increase its rates for the generation and distribution of electricity and for other relief.

Dear Ms. Andrews:

Enclosed are the Company's responses to discovery questions 20134-MEC-CE-173, 186 through 189, and 194. These responses are being served in hard copy format only on the requesting party. The requesting party and all others will be served with the discovery responses by e-mail. In an effort to save time in preparing responses to discovery requests, all responses will no longer be notarized.

In providing these responses, the Company does not necessarily concede that the requested information is relevant or material to these proceedings. The Company therefore specifically reserves the right to raise objections to the introduction into evidence, through cross-examination or otherwise, of any material supplied pursuant to a discovery request.

The Company intends to supplement a prior response if it becomes aware of a relevant and material error in the response. The Company also intends to supplement a prior response if it becomes aware that there has been a significant change in circumstances unknown to the requesting party which would substantially alter a prior response in a manner which is material and relevant to this case. However, the Company does not keep prior responses under continuous review.

Sincerely,

Digitally signed by

Anne M. Uitvlugt Date: 2018.07.20

16:11:55 -04'00'

Anne M. Uitvlugt

CC Hon. Sharon L. Feldman, ALJ (letter and proof of service only via e-mail) Kavita Kale, Executive Secretary (letter & proof of service via e-file) Sebastian Coppola (letter & responses via e-mail), sebcoppola@corplytics.com (& Hard C. of AG Reqs) +Excels/Disks Kevin Higgins (letter & responses via e-mail), khiggins@energystrat.com (& Hard C. of Kroger Co. Reqs)+Excels/Disks Jeffry C. Pollock (letter and responses via e-mail), jcp@jpollockinc.com (& Hard C. of ABATE Reqs) +Excels/Disks Parties of Record

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

| In the matter of the application of |) | |
|---|-----------------|------------------|
| CONSUMERS ENERGY COMPANY |) | |
| for authority to increase its rates for |) | Case No. U-20134 |
| the generation and distribution of |) | |
| electricity and for other relief. |) | |
| |) | |
| <u>P</u> 1 | ROOF OF SERVICE | |
| STATE OF MICHIGAN) | | |
|) SS | | |

Samantha J. O'Rourke, being first duly sworn, deposes and says that she is employed in the Legal Department of Consumers Energy Company; that on July 20, 2018, she served a hard copy of the material provided in response to discovery questions 20134-MEC-CE-173,186 through 189, and 194 upon the person noted below by depositing the same on July 20 2018, in the United States mail in the City of Jackson, Michigan, with first-class postage thereon fully paid. She further states that she served an electronic copy of the responses upon the persons listed in Attachment 1 hereto, at the e-mail addresses listed therein, with the exception of the Hon. Sharon L. Feldman, Administrative Law Judge, who received an electronic copy of the cover letter and proof of service only at feldmans@michigan.gov.

Tracy Jane Andrews, Esq. Olson, Bzdok & Howard 420 East Front Street Traverse City, MI 49686

COUNTY OF JACKSON

Samantha J. O'Rourke

Subscribed and sworn to before me this 20th day of July, 2018.

Tara L. Hilliard, Notary Public

State of Michigan, County of Jackson My Commission Expires: 09/12/20 Acting in the County of Jackson

Administrative Law Judge

Hon. Sharon L. Feldman Administrative Law Judge 7109 West Saginaw Highway Post Office Box 30221

Lansing, MI 48909

E-Mail: feldmans@michigan.gov

Counsel for the Michigan Public Service Commission Staff

Heather M.S. Durian, Esq. Daniel E. Sonneveldt, Esq. Michael J. Orris, Esq. Monica M. Stephens, Esq. Assistant Attorneys General Public Service Division 7109 West Saginaw Highway Post Office Box 30221

Post Office Box 3022 Lansing, MI 48909

E-Mail: durianh@michigan.gov

sonneveldtd@michigan.gov orrism@michigan.gov stephensm11@michigan.gov

Michigan Public Service Commission Staff

Mike Byrne Gary Kitts Bill Stosik Brian Ballinger Paul Proudfoot Bob Nichols

Michigan Public Service Commission

7109 West Saginaw Highway

Post Office Box 30221 Lansing, MI 48909

E-Mail: byrnem@michigan.gov

kittsg@michigan.gov stosikb@michigan.gov ballingerb2@michigan.gov proudfootp@michigan.gov nicholsb1@michigan.gov

Counsel for Attorney General, Bill Schuette

Celeste R. Gill, Esq. Assistant Attorney General Special Litigation Unit 6th Floor Williams Building 525 West Ottawa Street Post Office Box 30755 Lansing, MI 48909

E-Mail: gillc1@michigan.gov

AG-ENRA-Spec-Lit@michigan.gov

Consultant for Attorney General Bill Schuette

Sebastian Coppola, President Corporate Analytics 5928 Southgate Road Rochester, MI 48306

E-Mail: sebcoppola@corplytics.com

Counsel for Hemlock Semiconductor Corporation ("HSC") and Constellation NewEnergy Inc.

Jennifer Utter Heston, Esq. Fraser Trebilcock Davis & Dunlap, P.C. 124 West Allegan, Suite 1000 Lansing, MI 48933 E-Mail: jheston@fraserlawfirm.com

Counsel for Energy Michigan, Inc., Michigan Energy Innovation Business Council, and ChargePoint, Inc.

Timothy J. Lundgren, Esq. Kimberly Champagne, Admin. Asst. Varnum, LLP The Victor Center, Suite 910 201 North Washington Square Lansing, MI 48933

E-Mail: tjlundgren@varnumlaw.com kjchampagne@varnumlaw.com

sl0618-1-224 Page 1 of 4

Counsel for Energy Michigan, Inc.

Laura A. Chappelle, Esq. Varnum, LLP

The Victor Center, Suite 910 201 North Washington Square

Lansing, MI 48933

E-Mail: lachappelle@varnumlaw.com

Consultant for Energy Michigan, Inc.

Alex Zakem 46180 Concord Drive Plymouth, MI 48170

Email: ajz-consulting@comcast.net

Counsel for Michigan Energy Innovation Business Council

Toni L. Newell, Esq. Varnum, LLP The Victor Center, Suite 910 201 North Washington Square Lansing, MI 48933

E-Mail: tlnewell@varnumlaw.com

Consultant for Michigan Energy Innovation Business Council

Douglas B. Jester 5 Lakes Energy LLC 115 W. Allegan Street, Suite 710 Lansing, MI 48933

Email: djester@5lakesenergy.com

Counsel for ChargePoint, Inc.

Justin K. Ooms, Esq.
Varnum, LLP
The Victor Center, Suite 910
201 North Washington Square
Lansing, MI 48933
E-Mail: jkooms@varnumlaw.com

Counsel for the Michigan Environmental Council ("MEC"), the Natural Resources Defense Council ("NRDC"), and the Sierra Club

Christopher M. Bzdok, Esq.
Tracy Jane Andrews, Esq.
Kimberly Flynn, Legal Assistant
Karla Gerds, Legal Assistant
Olson, Bzdok & Howard, P.C.
420 East Front Street
Traverse City, MI 49686
E-Mail: chris@envlaw.com
tjandrews@envlaw.com
kimberly@envlaw.com
karla@envlaw.com

Counsel for The Kroger Company

Michael L. Kurtz
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 42502
E-Mail: mkurtz@BKLlawfirm.com
KBoehm@BKLlawfirm.com
JKylerCohn@BKLlawfirm.com

Consultant for The Kroger Company

Kevin Higgins
Energy Strategies, LLC
Parkside Towers
215 South State Street, Suite 200
Salt Lake City, Utah 84111
Email: khiggins@energystrat.com

sl0618-1-224 Page 2 of 4

Counsel for the Association of Businesses Advocating Tariff Equity ("ABATE")

Michael Pattwell, Esq. Bryan A. Brandenburg, Esq. Jennifer M. Johnson, Esq. Lauren K. Degnan, Esq. Clark Hill PLC

212 East César E. Chávez Avenue

Lansing, MI 48906

E-Mail: mpattwell@clarkhill.com

bbrandenburg@clarkhill.com jmjohnson@clarkhill.com ldegnan@clarkhill.com

Consultant for ABATE

Jeffry C. Pollock
Billie S. LaConte
Kitty A. Turner
J. Pollock, Inc.
12647 Olive Boulevard, Suite 585
St. Louis, MO 63141
E-Mail: jcp@jpollockinc.com
bsl@jpollockinc.com
kat@jpollockinc.com

Counsel for the Michigan Cable Telecommunications Association ("MCTA")

Michael S. Ashton, Esq. Anita G. Fox, Esq. Fraser Trebilcock Davis & Dunlap, P.C. 124 West Allegan Street, Suite 1000 Lansing, MI 48933 E-Mail: mashton@fraserlawfirm.com

afox@fraserlawfirm.com

Counsel for Michelle Rison and Residential Customer Group

Don L. Keskey, Esq.
Brian W. Coyer, Esq.
Public Law Resource Center PLLC
333 Albert Avenue, Suite 425
East Lansing, MI 48823
E-Mail:
donkeskey@publiclawresourcecenter.com
bwcoyer@publiclawresourcecenter.com

Counsel for Wal-Mart Stores East, LP and Sam's East, Inc.

Melissa M. Horne, Esq. Higgins, Cavanagh & Cooney, LLP 123 Dyer Street Providence, RI 02903 E-Mail: mhorne@hcc-law.com

Counsel for Environmental Law & Policy Center

Counsel for Midland Cogeneration Venture Limited Partnership ("MCV")

Richard J. Aaron, Esq. Jason T. Hanselman, Esq. John A. Janiszewski, Esq. Dykema Gossett PLLC 201 Townsend Street, Suite 900 Lansing, MI 48933 E-Mail: raaron@dykema.com

> jhanselman@dykema.com jjaniszewski@dykema.com

sl0618-1-224 Page 3 of 4

Counsel for the Michigan State Utility Workers Council, Utility Workers Union of America ("UWUA"), AFL-CIO

John R. Canzano, Esq.
McKnight, Canzano, Smith, Radtke &
Brault, P.C.
423 North Main Street, Suite 200
Royal Oak, MI 48067
E-Mail: jcanzano@michworkerlaw.com

sl0618-1-224 Page 4 of 4