

A CMS Energy Company General Offices: LEGAL DEPARTMENT One Energy Plaza Jackson, MI 49201 Ashley L Bancroft Robert W Beach Tel: (517) 788-0550 CATHERINE M REYNOLDS Fax: (517) 768-3644 Senior Vice President lan F. Burgess Don A D'Amato and General Counsel *Washington Office: Robert A. Farr Gary A Gensch, Jr. Emerson J. Hilton MELISSA M GLEESPEN 1730 Rhode Island Ave. N.W. Tel: (202) 778-3340 February 19, 2019 Suite 1007 Vice President, Corporate Washington, DC 20036 Fax: (202) 778-3355 Secretary and Chief Compliance Officer Gary L Kelterborn Chantez P Knowles Writer's Direct Dial Number: (517) 788-2112 SHAUN M JOHNSON Mary Jo Lawrie Writer's E-mail Address: anne.uitvlugt@cmsenergy.com Jason M Milstone Rhonda M Morris Vice President and Deputy General Counsel Deborah A Moss Michael C. Rampe Bret A Totoraitis Kelly M Hall Eric V Luoma Scott J Sinkwitts Adam C Smith Theresa A G Staley Ms. Kavita Kale Assistant General Counsel Janae M Thaver Anne M Uitvlugt **Executive Secretary** Aaron L Vorce Attorney Michigan Public Service Commission 7109 West Saginaw Highway Post Office Box 30221 Lansing, MI 48909

Re: MPSC Case No. U-20464 – In the matter, on the Commission's own motion, to issue a report on the state's supply, engineering, and deliverability of natural gas, electricity, and propane, and contingency planning, as requested by the Governor.

Dear Ms. Kale:

Enclosed for electronic filing in the above-captioned case, please find **Consumers Energy Company's Comments on the Michigan Energy Assessment Outline.** This is a paperless filing and is therefore being filed only in PDF.

Sincerely,

Anne M. Uitvlugt

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion, to) issue a report on the state's supply, engineering, and) deliverability of natural gas, electricity, and propane,) and contingency planning, as requested by the) Governor.)

Case No. U-20464

<u>CONSUMERS ENERGY COMPANY'S COMMENTS ON THE</u> <u>MICHIGAN ENERGY ASSESSMENT OUTLINE</u>

On February 7, 2019, at the request of Governor Gretchen Whitmer, the Michigan Public Service Commission ("MPSC" or the "Commission") issued an Order directing the Commission Staff to conduct a review of the state's supply, engineering, and deliverability of natural gas, electricity, and propane in order to assist the Commission in developing an Initial Report. In its Order, the Commission indicated that it would provide an Initial Report addressing these issues on July 1, 2019, and, following an examination of the Initial Report, would provide a Final Report on September 13, 2019. To assist in its development of the report, the Commission issued a draft outline setting forth the proposed scope for this energy assessment and requesting comments from interested parties.

Consumers Energy Company ("Consumers Energy" or the "Company") appreciates the opportunity to comment on the draft outline of the statewide energy assessment report. In reviewing the draft outline, Consumers Energy recommends that changes be made to Section III.B.3. Specifically, Consumers Energy recommends that this statement be expanded to include an evaluation of redundancy as part of the natural gas fuel arrangements. Moreover, any utility directives addressing perceived supply adequacy or redundancy shortfalls should also

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include a contemplation of regulatory recovery aligning incremental costs with customer class benefits.

Respectfully submitted,

February 19, 2019

CONSUMERS ENERGY COMPANY