

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter of the application of)	
CONSUMERS ENERGY COMPANY for approval to)	
implement a power supply cost recovery plan)	Case No. U-20219
for the 12 months ending December 31, 2019.)	
_____)	

At the April 15, 2020 meeting of the Michigan Public Service Commission in Lansing,
Michigan.

PRESENT: Hon. Sally A. Talberg, Chairman
Hon. Daniel C. Scripps, Commissioner
Hon. Tremaine L. Phillips, Commissioner

ORDER

History of Proceedings

On September 28, 2018, pursuant to 1982 PA 304 (Act 304), MCL 460.6j *et seq.*, Consumers Energy Company (Consumers) filed an application, with supporting testimony and exhibits, requesting approval to implement a power supply cost recovery (PSCR) plan in its rate schedules for metered jurisdictional sales of electricity for the 12 months ending on December 31, 2019. In its application, Consumers requested approval of a uniform monthly maximum PSCR factor of \$0.00106 per kilowatt-hour (kWh)¹ for all classes of customers, as well as acceptance of its PSCR plan and five-year forecast.

¹ During the proceeding, Consumers corrected and revised the utility's Exhibit A-22 to demonstrate a new PSCR factor of \$0.00059 per kWh to replace the utility's originally requested factor of \$0.00106 per kWh.

Consumers stated total system requirements for 2019 of 36,068,235,000 kWh and total system power supply costs of \$2,029,001,703 including system transmission expenses and environmental costs. After factoring in corrected calculations,² the result was a reduced PSCR factor of \$0.00059 per kWh. 2 Tr 160-162, 231-232; Corrected Exhibit A-22. Consumers' PSCR plan and five-year forecast detailed the utility's cost-saving strategies for the purchase of fuels used to generate electricity, including the markets from which price-points were derived, the use of long-term contracts, spot markets, competitive bidding processes, gas management service contracts, transportation of purchased fuels, and the availability of fuel storage. Consumers also specified the utility's forecasting methods and concerns, such as weather patterns, future availability of resources including renewable fuel resources, interruptible service, and purchase of zonal resource credits, as well as other matters.

A prehearing conference was held on December 4, 2018, before Administrative Law Judge Sally L. Wallace (ALJ), who granted petitions to intervene filed by the Michigan Department of the Attorney General (Attorney General), the Michigan Environmental Council (MEC), the Residential Customer Group (RCG), Michigan Power Limited Partnership and Ada Cogeneration Limited Partnership (MPLP/Ada), and the Association of Businesses Advocating Tariff Equity (ABATE). The Commission Staff (Staff) also participated in the proceeding.

² Originally, Consumers had incorrectly determined the amount of its net interchange power expenses, less zonal resource credits. These matters were testified to by Joshua W. Hahn, Senior Engineer in the Merchant Operations and Resource Planning Sector of Consumers' Electric Grid Integration Department, and by Andrew G. Volansky, Senior Rate Analyst in the Revenue Requirement and Analysis section of Consumers' Rates and Regulation Department. Their testimony, in their entireties, are found at 2 Tr 144-162, and 2 Tr 225-232, respectively. *See also*, Corrected Exhibit A-7, line 26, columns (c) through (n) and Corrected Exhibit A-8, lines 27 and 34.

On July 10, 2019, an evidentiary hearing was held before ALJ. MEC, ABATE, and MPLP/Ada did not appear or participate. On August 12, 2019, Consumers and RCG filed initial briefs, and the Attorney General and the Staff filed letters stating they would not be filing initial briefs. On August 13, 2019, RCG filed a confidential brief. On September 11, 2019, Consumers and RCG filed reply briefs and the Staff filed a letter stating it would not be filing a reply brief. The record consists of 265 pages of testimony and 47 exhibits admitted to the record. 2 Tr 41-64 and Exhibits A-23, A-24, and RCG-6 through RCG-15 are confidential.

On January 14, 2020, the ALJ issued a Proposal for Decision (PFD) in which she set forth an overview of the parties' positions and testimony with references to specific testimony and exhibits, which will not be repeated here. *See*, PFD, pp. 2-26. On February 4, 2020, RCG filed exceptions to the PFD. No other party filed exceptions. On February 18, 2020, Consumers filed replies to exceptions. No other party filed replies to exceptions.

Proposal for Decision

The ALJ recounted the procedural history of the case and the statutory requirements applicable to the PSCR proceeding. PFD, pp. 1-2, 26-28. The ALJ also detailed Consumers' presentation of its 2019 PSCR plan and five-year forecast and stated her opinion that the proposed PSCR plan and maximum PSCR factor of not greater than \$0.00059 per kWh should be approved for all customer classes and that the five-year forecast should be accepted. PFD, pp. 2-14, 28. The ALJ stated that, after comparing the plan provided in the instant case to the plan supplied in

Case No. U-18402,³ the Staff believed the “company’s assumptions and methodologies, including system, transmission, and environmental costs, used to develop the PSCR factor, were reasonable and prudent.”⁴ PFD, p. 15; 2 Tr 249. The ALJ indicated that RCG raised several concerns but did not recommend specific changes to the factor or plan. PFD, p. 28.

Pursuant to RCG’s concerns, the ALJ identified and discussed four issues for resolution: (1) potential cost savings from Consumers’ suppliers and vendors pursuant to the Tax Cuts and Jobs Act (TCJA) of 2017; (2) demand charges for the SEMCO-owned Zeeland lateral pipeline; (3) demand charges for the Consumers-owned Jackson lateral pipeline; and (4) Consumers’ use of gas management service agents.

1. Potential Cost Savings from Suppliers and Vendors Pursuant to the Tax Cuts and Jobs Act of 2017

Consumers asserted that its plan includes TCJA-related reduced transmission costs subsequent to the Michigan Electric Transmission Company’s “resettled and reduced transmission costs” which were carried forward to rates filed with the Midcontinent Independent System Operator,

³ Case No. U-18402 is Consumers’ 2018 PSCR plan case. At the time of the hearing, a final order had not been issued. The Staff also compared Consumers’ plan in the instant case to Case No. U-18142, Consumers’ PSCR plan case for the 2017 calendar year in which an order was issued on February 5, 2018, approving the plan and accepting the forecast (February 5 order). Subsequently, an order that clarified the February 5 order was issued on July 24, 2018 (July 24 order). Cumulatively, in the two orders, the Commission disallowed the potential purchase cost of the SEMCO-owned Zeeland lateral pipeline as being more appropriately addressed as a capital cost in a general rate case and allowed the Zeeland demand charges. *See*, February 5 order, pp. 12-17, and July 24 order.

⁴ Mr. Raushawn D. Bodiford, an engineer in the Commission’s Act 304 and Sales Forecasting Section, testified regarding these issues. His testimony is found, in its entirety, at 2 Tr 234-249.

Inc.⁵ 2 Tr 127-128. The utility declared that it could not pursue contract renegotiations with vendors and suppliers because the current power purchase agreements (PPAs) do not contain provisions for renegotiation and such actions could have detrimental results, among them being an increase in contract rates due to the vendor or supplier having higher costs than are reflected in the current PPAs.⁶ 2 Tr 100-101.

RCG asserted that Consumers' plan does not describe the steps the utility has taken to obtain TCJA savings from the utility's supplier and vendor contracts, argued that Consumers has an obligation to take action to secure any potential cost reductions, including reexamination and renegotiation of its PPAs, and denied Consumers' claim that the utility could not renegotiate its PPAs.⁷ PFD, p. 24; 2 Tr 255-259; RCG's initial brief, pp. 2-4; RCG's reply brief, pp. 3-4; Exhibits RCG-3, -4, -5.

The ALJ recommended that the Commission reject RCG's suggestion, agreeing with Consumers that the original PPAs do not include provisions that would permit renegotiation of terms and that the price terms recognize that underlying costs may increase or decrease throughout the course of the agreement.⁸ PFD, p. 29; 2 Tr 99-101, 193-195, 221-222. She also pointed out

⁵ Mr. Daniel S. Alfred, Senior Rate and Business Support Analyst in the Transmission and Regulatory Strategies Department of Consumers' Energy Supply Operations, testified on this issue. His testimony is found, in its entirety, at 2 Tr 114-128.

⁶ Mr. Keith G. Troyer, Senior Engineer in the Transactions and Wholesale Settlements, Electric Contract Strategy Section of Consumers' Electric Grid Integration Department, testified on this issue. His testimony is found, in its entirety, at 2 Tr 83-111.

⁷ Mr. Geoffrey C. Crandall, principal and vice president of MSB Energy Associates, testified on behalf of RCG. His testimony is found, in its entirety, at 2 Tr 252-263.

⁸ The following witnesses testified on behalf of Consumers regarding these issues: Mr. Keith G. Troyer, whose testimony is found, in its entirety, at 2 Tr 83-111; Mr. Kevin C. Lott, Fuels Transportation & Planning Director in Consumers' Electric Supply Operations Department, whose testimony is found, in its entirety, at 2 Tr 181-195; and Ms. Angela K. Rissman, Manager of Coal

that Consumers presented evidence to establish that the utility attempts to control costs through competitive bidding, spot purchases, and staggered contracts.⁹ PFD, p. 29; 2 Tr 25-26, 38, 194, 214-215.

RCG excepts for three reasons and makes clear that it believes Consumers should be required to renegotiate all vendor and supplier contracts for potential TCJA savings, not merely those discussed in this case. RCG's exceptions, pp. 2-6. First, RCG disputes Consumers' contention that the utility cannot renegotiate contracts because the PPAs contain no mechanism to do so, asserting it is false "on its face" and arguing that utilities renegotiate contracts all the time, including, most recently, Consumers' renegotiation of its Zeeland lateral contract which resulted in lower demand charges. *Id.*, p. 3. RCG also argues that Consumers has not attempted to commence any discussion of contract renegotiation with its vendors or suppliers, thus rendering Consumers' claim that such renegotiations may not have meaningful results to be wholly unsubstantiated and speculative. *Id.*, p. 4. Further, RCG finds Consumers assertion that any attempts to renegotiate contracts may result in having to pay for the suppliers increased cost of doing business to be both "vacuous and speculative" because the company has no "specific knowledge of any increased costs incurred by any of its suppliers or vendors." *Id.*

Consumers replies that it lacks a mechanism to require vendors and suppliers to renegotiate the agreements at issue, that a meaningful outcome would not be expected if the utility did pursue renegotiations, that there are risks that the utility would end up with higher rather than lower

Procurement in Fossil Fuel Supply at Consumers, whose testimony, in its entirety, is found at 2 Tr 212-223.

⁹ Mr. Stephen J. Nadeau, Manager of Natural Gas Supply for Generation in Fossil Fuel Supply at Consumers, as well as other witnesses, testified on behalf of Consumers regarding this issue. Mr. Nadeau's testimony is found, in its entirety, at 2 Tr 21-82. 2 Tr 41-64 are confidential.

contract costs, and competitive bidding and procurement strategies are designed to account for market changes such as the TCJA. Consumers' replies to exceptions, pp. 6-8.

The Commission agrees with the ALJ and Consumers on this issue. Contract agreements take into account numerous complex matters considered in their entirety to arrive at mutually agreeable terms and conditions. Requiring Consumers to renegotiate agreements solely for potential savings from the TCJA ignores this reality, particularly when the agreements provide no mechanism for such renegotiation. Accordingly, the Commission declines to require Consumers to attempt to renegotiate its supplier and vendor contracts to pursue potential TCJA savings and finds the current expenses to be reasonable and prudent.

2. Demand Charges for SEMCO-owned Zeeland Lateral Pipeline

RCG argued that the Commission should disallow all of Consumers' Zeeland lateral pipeline costs in the current plan, the five-year forecast, and all future plans because cost savings would occur if Consumers purchased the pipeline rather than leased it; or, in the alternative, the Commission should continue the partial disallowance of Zeeland lateral-related expenses as decided in the orders in Case No. U-18142.¹⁰ RCG's initial brief, p. 6; 2 Tr 259-260, 262. *See*, the February 5 order, pp. 12-17, and the July 24 order.

Consumers rebutted that the demand charge the utility pays to SEMCO is cheaper than would be the purchase of the pipeline, particularly when considering the potential maintenance costs after purchase, and asserted that RCG's analysis failed to factor in these costs. Consumers asserted that

¹⁰ It is likely that RCG refers to the Commission's past disallowance of the potential purchase price of the lateral; however, Consumers did not include such an expense in the instant plan case or its forecast, so RCG's meaning is unclear when it states that the Commission should continue the partial disallowance from Case No. U-18142.

the Commission agreed, as evidenced by the demand charge approval in the February 5 order. 2 Tr 34-35; Confidential 2 Tr 50-52; Confidential Exhibit A-23.

The ALJ recommended that the Commission dismiss RCG's claims relating to the Zeeland lateral, agreeing with Consumers that RCG failed to consider the \$225,000 annual cost savings if SEMCO continues to own and operate the lateral and failed to acknowledge the reduction in demand charges that occurred subsequent to Consumers' negotiation of a new contract with SEMCO.¹¹ PFD, p. 29; 2 Tr 35; Confidential 2 Tr 51-52; Confidential Exhibit A-23.

In its exceptions, RCG again argues that Consumers failed to meet its burden of proof that leasing the Zeeland lateral is more economical than its purchase, opining that achieving a lower demand charge through contract negotiation likely only proves that the previous costs were unreasonable and imprudent, and declares that Consumers' testimony regarding savings was unsupported by a "detailed study or analysis." RCG's exceptions, p. 8.

Consumers replies that the evidence in the case establishes that demand charges for the Zeeland lateral are "reasonable, prudent, and in the best interest of customers." Consumers' replies to exceptions, p. 8. Pointing to Confidential Exhibit A-23, Consumers asserts that the utility has "performed a cost-benefit analysis to determine the benefits of continuing to pay a lower annual demand charge to SEMCO versus purchasing the Zeeland lateral," and revealed that PSCR customers will realize an annual \$225,000 savings with continued payment of demand charges. *Id.*, p. 11.

The Commission agrees with the ALJ and Consumers on this issue and declines to disallow the Zeeland lateral demand charges included in the PSCR plan and forecast as suggested by RCG.

¹¹ The PFD noted that this information was also testified to by Mr. Stephen J. Nadeau in Case No. U-20068. *See*, 2 Tr 275 in Case No. U-20068. *See also*, Consumers' initial brief, p. 20.

Confidential Exhibit A-23 provides a thorough and clear analysis that payment of an annual demand charge is more cost-effective than the purchase of the lateral, especially considering costs related to the maintenance of the pipeline. Accordingly, the Commission finds the demand charges are reasonable and prudent and approves the expense.

3. Demand Charges for Consumers Energy Company's Jackson Lateral

RCG argued that Consumers did not meet its burden of proof that demand charges paid by Consumers' electric business to Consumers' gas business related to Consumers' Jackson natural gas plant's (Jackson plant's) interconnection pipeline are reasonable and prudent, and asserted that the charges are "mythical" and "an affiliate abuse." RCG's reply brief, pp. 4-6.

Consumers testified that, while the Jackson plant and pipeline are owned by Consumers, the 50-year contract was negotiated in 2002 for Consumers' electric business, prior to Consumers' purchase of the plant. Confidential 2 Tr 53-54.

The ALJ disagreed with RCG's suggestion that Consumers' gas pipeline services be provided to Consumers' electric business *gratis* because such a practice "would unreasonably result in gas customers subsidizing electric customers for the use of the lateral." PFD, p. 30. However, she recommended that, in Consumers' reconciliation case and in future PSCR cases, the Commission should require the utility to present more evidence that the Jackson lateral charges are reasonable and prudent because the contract with the Jackson plant was entered into 18 years ago, has not been revisited in the interim, and is an affiliate transaction. *Id.*, pp. 30-31.

RCG takes exception to the ALJ's reasoning, and continues to argue that it is unreasonable for Consumers' "left hand" to charge its "right hand" and to gain a profit from the charge, both of which result in "unnecessary and duplicative costs" being passed on to ratepayers. RCG's exceptions, p. 9.

Consumers replies that it does not take exception to the ALJ's recommendation that additional supporting documentation regarding the demand charges related to the Jackson lateral should be provided in future reconciliation and plan cases, but continues to insist that Consumers' gas business cannot provide free services to Consumers' electric business without the gas side customers subsidizing the electric side customers. Consumers' replies to exceptions, pp. 13-16.

The Commission is not persuaded by RCG's arguments. Consumers' electric and gas rates are considered in wholly separate proceedings, as are the power supply costs and factors for each. Consumers' gas side business would suffer a loss of revenue if it stopped charging the electric side for use of the Jackson lateral, potentially resulting in higher rates for gas customers in the utility's next gas rate case. It is neither reasonable nor prudent that electric side customers obtain the benefit of lower power supply costs through no-charge or low-charge use of the Jackson lateral at the expense of the gas side customers from whom pipeline operation and maintenance costs are recovered. Therefore, the Commission declines to disallow demand charges related to the Jackson lateral as suggested by RCG and finds the charges to be reasonable and prudent. However, the Commission further finds that, in future reconciliation and plan cases, Consumers should provide additional documentation of its demand payment agreement and transactions related to the Jackson lateral because the payments are an affiliate transaction, the contract was negotiated 18 years ago with the prior owner, and there appears to have been no discussions between the gas side and electric side businesses regarding potential amendments to the contract since Consumers finalized its purchase.

4. Gas Management Service Agents

RCG asserted that Consumers should be compelled to prove a “net economic benefit to PSCR customers” as relates to gas management service contracts and suggests that in-house contracting or implementation of a transparent bidding process should be required. 2 Tr 261-263.

Consumers pointed out that RCG’s suggestion pertained to the reconciliation phase of this case and argued that whether gas management services should be managed in-house is beyond the scope of the case. Consumers also argued that the Commission has reviewed and approved the use of these services in numerous past PSCR plan and reconciliation cases.¹² Consumers’ initial brief, pp. 23-24.

The ALJ opined that Consumers’ use of gas management service agents has received Commission support and approval in numerous PSCR plan and reconciliation cases and there were no new issues brought to the fore by RCG in the instant case. She also noted that Consumers does not offer gas management services commercially, and the agent contracts are competitively bid. PFD, p. 31.

In its exceptions, RCG contends that Consumers has failed to meet its burden of proof that the use of gas management service agents is reasonable and prudent, arguing that past use of the agents is not proof of current economic benefit. RCG’s exceptions, p. 11. RCG further expresses its perplexity at why Consumers’ gas division, with its “considerable experience and expertise in contracting for natural gas supplies and transportation, and in managing the company’s approximately 23 gas storage fields in Michigan, and in managing its extensive instate pipeline

¹² Consumers specifically mentioned Case Nos. U-16045-R (PSCR reconciliation case for calendar year 2010), U-16432-R (reconciliation case for calendar year 2011), U-16890 (reconciliation case for calendar year 2012), U-17095 (plan case for 2013), and U-17918 (plan case for 2016). Consumers’ initial brief, p. 24.

and distributive system[,]” cannot provide gas management services to Consumers’ electric division without the added expense of a profit margin. *Id.*, pp. 12-13.

Consumers replies that the utility uses competitive bidding processes, compares all bids to the cost of providing gas management services in-house, and points to Confidential Exhibit A-24 for an analysis that proves that out-sourcing gas procurement services is the more cost-effective choice. Consumers’ replies to exceptions, p. 18.

The Commission is not persuaded by RCG’s arguments and agrees with the ALJ that Consumers’ use of gas management service agents has been addressed in past PSCR plan and reconciliation cases and no new issues were raised in the instant case. As the ALJ stated in the PFD, “RCG’s claim that it would be more economical for the gas side of the company to undertake these services for the electric side of the company is speculative and without any evidentiary support in [the] record.” PFD, p. 31. Further, Consumers provided testimony that the gas side of the company does not offer commercial gas procurement services. *Id.*; 2 Tr 66. In addition, as the ALJ pointed out, the “reasonableness of gas management services agreements can be addressed in the PSCR reconciliation.” PFD, p. 31. And finally, RCG fails to make any persuasive argument as to why it would be reasonable for gas customers to forego the profit from providing gas procurement services and, potentially, suffer higher gas rates, so that electric customers can enjoy a lower power supply cost. Therefore, the Commission finds the gas management service expenses to be reasonable and prudent, but expects that the contracts and expenses to be adequately examined in the reconciliation case.

Consumers Five-year Forecast

The ALJ summarized the Staff’s testimony regarding Consumers’ five-year forecast, stating that the Staff had “conducted numeric comparisons to the baseline PSCR plan cases and compiled

a forecast of the company's generation by source" and that "the company's forecasts align with historical forecasts, with few exceptions, which the company explained."¹³ PFD, pp. 14-15; 2 Tr 244, Table 1. She recommended that the Commission accept the forecast. PFD, p. 28.

In contrast, RCG criticized the forecast because Consumers did not pursue all cost savings from the TCJA through renegotiation of vendor and supplier contracts, did not prove that the utility's continued lease of the SEMCO-owned Zeeland lateral is prudent relative to the purchase of the pipeline, and failed to establish that the costs related to Consumers' electric side procurement of gas via the Jackson lateral owned by Consumers' gas side are reasonable and prudent. PFD, p. 15; 2 Tr 254-263.

The objections posed by RCG pursuant to Consumers' five-year forecast have been adequately addressed in the above analyses and conclusions related to the PSCR plan in the instant case and will not be discussed further here because no new issues are raised. The Commission has reviewed the forecast and finds it does not appear to include any expenses that the Commission would be unlikely to permit recovery of from Consumers' customers in rates, rate schedules, or PSCR factors established in the future. Accordingly, the Commission is persuaded that Consumers' five-year forecast is reasonable and prudent and accepts the five-year forecast.

Conclusion

The Commission approves Consumers' PSCR plan for the year ending December 31, 2019, with amendments as discussed above, and accepts Consumers' five-year forecast.

¹³ Mr. Raushawn D. Bodiford testified regarding these issues, whose testimony is found, in its entirety, at 2 Tr 234-249.

THEREFORE, IT IS ORDERED that:

- A. The power supply cost recovery plan for the year ending December 31, 2019, filed by Consumers Energy Company, is approved, as described in this order.
- B. The power supply cost recovery factor of \$0.00059 per kilowatt-hour for the year ending December 31, 2019, is approved.
- C. Consumers Energy Company's five-year forecast is accepted.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, pursuant to MCL 462.26. To comply with the Michigan Rules of Court's requirement to notify the Commission of an appeal, appellants shall send required notices to both the Commission's Executive Secretary and to the Commission's Legal Counsel.

Electronic notifications should be sent to the Executive Secretary at mpscedockets@michigan.gov and to the Michigan Department of the Attorney General - Public Service Division at pungpl@michigan.gov. In lieu of electronic submissions, paper copies of such notifications may be sent to the Executive Secretary and the Attorney General - Public Service Division at 7109 W. Saginaw Hwy., Lansing, MI 48917.

MICHIGAN PUBLIC SERVICE COMMISSION

Sally A. Talberg, Chairman

Daniel C. Scripps, Commissioner

Tremaine L. Phillips, Commissioner

By its action of April 15, 2020.

Lisa Felice, Executive Secretary


PROOF OF SERVICE

STATE OF MICHIGAN)

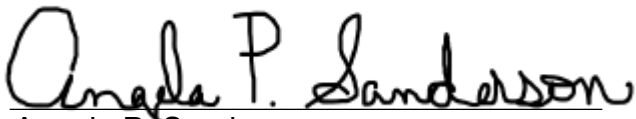
Case No. U-20219

County of Ingham)

Brianna Brown being duly sworn, deposes and says that on April 15, 2020 A.D. she electronically notified the attached list of this **Commission Order via e-mail transmission**, to the persons as shown on the attached service list (Listserv Distribution List).


Brianna Brown

Subscribed and sworn to before me
this 15th day of April 2020.



Angela P. Sanderson
Notary Public, Shiawassee County, Michigan
As acting in Eaton County
My Commission Expires: May 21, 2024

Service List for Case: U-20219

Name	Email Address
Bret A. Totoraitis	bret.totoraitis@cmsenergy.com
Brian W. Coyer	bwcoyer@publiclawresourcecenter.com
Celeste R. Gill	gillc1@michigan.gov
Christopher M. Bzdok	chris@envlaw.com
Consumers Energy Company 1 of 2	mpsc.filings@cmsenergy.com
Consumers Energy Company 2 of 2	michael.torrey@cmsenergy.com
Don L. Keskey	donkeskey@publiclawresourcecenter.com
Gary A. Gensch Jr.	gary.genschjr@cmsenergy.com
Heather M.S. Durian	durianh@michigan.gov
Ian F. Burgess	ian.burgess@cmsenergy.com
Jennifer U. Heston	jheston@fraserlawfirm.com
Michael C. Rampe	michael.rampe@cmsenergy.com
Monica M. Stephens	stephensm11@michigan.gov
Robert W. Beach	robert.beach@cmsenergy.com
Sally Wallace	wallaces2@michigan.gov
Stephen A. Campbell	scampbell@clarkhill.com
Theresa A.G. Staley	theresa.staley@cmsenergy.com